

Occupational Health & Safety Policy and Practice

January 2023

OCCUPATIONAL HEALTH & SAFETY POLICY STATEMENT

VolkerHighways is a multi-disciplinary contractor operating around the United Kingdom. Our services include management of street cleansing, street lighting and electrical services, highways term maintenance, civil engineering and public realm infrastructure projects. Specialist divisions provide surfacing, specialist surfacing and traffic management. We also offer Smart City services such as fibre installation, through VolkerSmart Technologies, a division of VolkerHighways.

Health and Safety is a core value which will be set in context with all other business objectives, to ensure the health, safety and wellbeing of all VolkerHighways employees and others who may be affected by the company's activities. This statement of policy, and the organisation and arrangements for its implementation, has been prepared to comply with section 2(3) of the Health & Safety at Work Act 1974. Further arrangements for its implementation are detailed within VolkerHighways company processes, procedures, and site management plans. The company will treat the need to prevent accidents, injuries and ill health to employees and others affected by its work as a top priority. In doing so, it will ensure priority is given to the assessment of risk, health and safety planning, and to providing proper information, instruction, training and supervision in accordance with the relevant statutory provisions and industry best practice.

The Senior Management of VolkerHighways are committed to the review and improvement of health and safety performance, including implementing new guidelines and requirements in its endeavour to achieve industry best practice and in line with our commitment to ISO 45001:2018. VolkerHighways will establish and review quantifiable objectives and targets according to the nature of our activities, business and other legal requirements, to ensure continual improvement in both our safety management systems and our performance.

As an employer, we have a legal responsibility to protect workers and others from all workplace risks to their health and safety. This means we need to think about the risks we face and do everything reasonably practicable to minimise them, including the risks associated with pandemics such as the coronavirus.

Adequate resources, commitment and the participation of all employees will ensure the continuation and development of a positive health and safety culture. VolkerHighways' policy is to take all reasonable steps to prevent work related accidents and ill-health, and to support the general health and well-being of its employees.

To implement this policy, VolkerHighways will:

- Ensure the effective planning of Health and Safety through the assessment of risk carried out in line with the hierarchy of control
- Build on existing arrangements to ensure we meet our legal obligations to protect the health, safety and wellbeing of our employees and public affected by our works
- Make sure that the causes of accidents, ill-health and fatigue that may arise from its activities are, wherever possible, identified, understood, and either prevented or controlled
- Ensure early intervention, proactive and supportive Health and Wellbeing Management for the return to work of employees after sickness certification and, wherever possible, support rehabilitation after prolonged illness
- Provide employees with information and services to help them take personal responsibility for maintaining and improving their own health

It is a fundamental company belief that the creation of a safe workplace is achieved through clear and effective communication at all levels of the organisation. Our *Protect our People* behavioural safety programme maintains a culture where our employees contribute to safe systems of work through active and open participation.

All employees and others working for VolkerHighways are required to comply with this policy. In particular, by cooperating and carrying out activities safely, and in such a manner that does not intentionally or recklessly interfere with, or misuse, anything provided in the interest of health, safety or welfare. It is the responsibility of VolkerHighways' management and supervisory staff to ensure that this policy and its arrangements are implemented. This policy will be reviewed annually and revised as often as may be deemed appropriate by VolkerHighways, and then brought to the attention of all employees. It is accessible to interested parties via the VolkerHighways' website, Workspace, displayed in reception areas, or is available on request.

Alistair Thompson

Managing Director

January 2023

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INTRODUCTION

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This document describes the arrangements in place to put into practical effect the commitment made in the Occupational Health & Safety Policy Statement.

The way in which VolkerHighways identifies and subsequently manages external and internal issues that are relevant to its purpose and its strategic direction is described within operational procedure Q19 *Determining the Context of our Organisation*.

Assessing context, together with the management of relevant issues arising, allows assurance of the business' ability to achieve the intended result(s) of its occupational health & safety management system.

The VolkerHighways SMT is committed to maintaining high standards of health, safety and welfare throughout its operations. Company requirements are designed to secure, so far as is reasonably practicable, the health, safety and welfare of our employees and others, including the general public, who may be affected by our operations.

The company's Health & Safety Policy is applicable to all projects, offices and operational facilities.

Formal amendment to this document is the responsibility of the Head of HSEQS with the approval of the Managing Director. This document will be brought to the notice of all employees. Staff appointed responsible for the management and implementation of health and safety requirements will ensure that at least one copy is available on each site.

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1.0 ORGANISATION AND ARRANGEMENTS**1.1 ARRANGEMENTS FOR IMPLEMENTATION OF POLICY**

The company will achieve the aims and objectives of this policy by:

- Providing clearly defined, safe systems of work and communicating them in sufficient detail to those affected
- Making due allowance in financial terms at the tender stage to ensure that sufficient resources and competent persons are provided for the management of health & safety at work
- Paying particular attention to the provision of safe access and egress
- Selecting and training personnel
- Providing sufficient resources to ensure employee's mental wellbeing (in addition to their physical health and safety)
- Providing such information, instruction, training and supervision as may be necessary to personnel at all levels, paying particular attention to personnel attending a location for the first time or on a temporary basis
- Controlling hazardous substances
- Ensuring the receipt of timely, adequate information from subcontractors and suppliers in respect of health & safety planning, e.g., risk and COSHH assessment and method statements, prior to work commencing
- Identifying hazards and assessing the risks to health and safety in the workplace together with the provision and maintenance of adequate control measures
- Making arrangements for consultation between management and employees
- Providing appropriate plant and equipment which is tested, certificated and safe to use
- Displaying and communicating such written or pictorial information as may be necessary to assist in the implementation of safe practices
- Maintaining high standards of hygiene, cleanliness and housekeeping
- Identifying workplaces which may be difficult to evacuate in an emergency and providing control measures
- Establishing emergency procedures and ensuring they are under the control of trained people
- Reporting and investigating accidents, disseminating findings and where appropriate revising arrangements and procedures
- Ensuring adequate and appropriate protective equipment is provided
- Ensuring the occupational health and mental well-being of employees
- Carrying out appropriate health surveillance
- Monitoring and reviewing performance

1.2 LEADERSHIP

Leadership and commitment with respect to the quality of the services and products provided by, and the effectiveness of the Occupational Health & Safety Management System used by VolkerHighways, is displayed down through the various levels of senior management. From the VolkerHighways' Senior Management Team, on through business unit and operations senior management, support specialists and through line management functions, to team leaders.

Performance against the requirements of the Occupational Health & Safety Management System is regularly monitored and supported by leadership via Senior Manager's Inspections, HSEQS monthly meeting Reviews and Business Briefings.

1.0 ORGANISATION AND ARRANGEMENTS (CONTINUED)**1.3 RESPONSIBILITY FOR HEALTH & SAFETY**

BS ISO 45001:2018 uses the term ‘top management’ to identify a number of key responsibilities with regard to health and safety management. The roles that fall within VolkerHighways ‘top management’ are shown below:

- Managing Director
- Operations Director(s)
- Commercial Director
- Head of Pre-construction
- Head of HSEQS
- VolkerWessels UK Corporate Responsibility Director

‘Top management’ responsibilities for health and safety include:

- Developing the Occupational Health & Safety Policy and objectives for VolkerHighways and ensuring that the correct organisational structure and resources are in place to support the intended outcomes of occupational health & safety management systems.
- Promoting the policy and objectives to employees to increase awareness, motivation and involvement
- Ensuring that the goals and responsibilities for individual employees reflect our overall health and safety objectives
- Meeting and exceeding client requirements and expectations
- Ensuring the Occupational Health & Safety Management System (OHSMS) is implemented to meet the needs of VolkerHighways, its clients and other interested parties
- Review the OHSMS periodically
- Identify ways in which to improve the OHSMS
- Appoint a management representative to monitor and report on the development, performance and improvement of the OHSMS

Different roles have varying levels of authority with regard to our OHSMS. These are explained as follows:

Managing Director

The Managing Director (MD) (who is also the Board of Directors’ representative for health and safety management) holds overall responsibility for the operations of VolkerHighways, from developing long term strategy for the business to overseeing its day-to-day activities. The MD is ultimately responsible for the company’s OHSMS and setting realistic goals for the continuous improvement in risk management and reduction of accident rates.

Health and Safety Management Roles - competence, support, impartially and independence

For the purposes of clarification under BS EN ISO 45001:2018, health and safety management is not outsourced. Competent health and safety professionals are employed with the necessary skills, knowledge and experience, as detailed within job descriptions and vacancies (when applicable).

A dedicated Head of HSEQS, and three health and safety managers, are directly employed by VolkerHighways. Their line management reporting lines are outside those of operational delivery teams, and thus maintain the ability to perform their roles with independence and impartially, and the full support of the organisation. Their competence is reviewed on a regular basis including, but not limited to, Development Performance Reviews (DPRs).

The VW UK CR Director, in reporting to the CEO, retains overall responsibility for the integrated management system (IMS) and oversight of health and safety management on behalf of the VW UK board. The VW UK Director retains impartiality in their remit and extends this impartiality to all employees in dedicated health and safety management roles, to ensure they are facilitating the achievement of health and safety management requirements. The VW UK CR Director’s responsibilities include a duty to support dedicated health and safety management employees in the achievement of their own responsibilities, and will report any shortfalls to the VW UK board as a minimum.

1.0 ORGANISATION AND ARRANGEMENTS (CONTINUED)**1.3 RESPONSIBILITY FOR HEALTH & SAFETY (CONTINUED)****Operations Director(s) / Commercial Director / Head of Pre-Construction**

Reporting to the Managing Director and responsible for:

- The safe delivery of all VolkerHighways contracts
- Overseeing and supporting the effective implementation of the OHSMS and liaising with clients to ensure their satisfaction
- Training, supporting and mentoring their direct staff to develop their knowledge / application of the OHSMS
- Accepting their individual role in providing health and safety leadership and engaging active participation of workers in improving health & safety
- Recognising their role in engaging active participation of workers in improving health and safety
- Leading management under their control to implement the Health & Safety Policy at all times
- Cooperating with the HSEQS team to ensure proper communication exists at all levels
- Ensuring adequate planning is undertaken to provide appropriate resources, training and safe systems of working
- Ensuring the provision of this policy is kept under review having regard to changes in legislation, best practice and the company's business
- Treat the health and safety of persons under their control as a matter of the highest importance

OHSMS Management Representative - Head of HSEQS

The Head of HSEQS is the appointed Management Representative for health and safety and has the authority to take any action necessary to ensure that health and safety is maintained. Reporting to the Managing Director, it is the responsibility of the Head of HSEQS to:

- Ensure the effective use of the HSEQS department and its resources
- Ensure the advisory service provided by the department is an effective and practical interpretation of applicable regulatory and company requirements
- To assist the Managing Director in setting realistic goals for the continual improvement in risk management and reduction of accident / incident rates
- Review and develop the OHSMS to achieve the goals and objectives are being set and achieved
- Ensure the goals set are periodically monitored to agreed standards
- Ensure the company is audited against the standards detailed in the OHSMS
- Identify opportunities for improvement
- Adhere to the professional code of conduct as set through membership of the Institute of Occupational Safety and Health
- Inform, guide and support the business in creating workplaces with a positive health and safety culture

1.0 ORGANISATION AND ARRANGEMENTS (CONTINUED)

1.3 RESPONSIBILITY FOR HEALTH & SAFETY (CONTINUED)

Health & Safety Manager

Reporting to the Head of HSEQS, the Health & Safety Manager is part of the HSEQS team responsible for ensuring effective implementation of the OHSMS. The Health and Safety Manager provides support, guidance and training to the VolkerHighways business.

The responsibilities of a Health & Safety Manager are to:

- Play a key part in improving the health and maintaining the safety of employees, people working on our behalf, and any other parties affected by our activities
- Inform, guide and support the workforce in creating workplaces with a positive health and safety culture
- Visit sites regularly (every four weeks whenever possible) and monitor performance in relation to the policy and procedures
- Discuss and plan the safe implementation of future works
- Carry out auditing in accordance with company procedure Q03 *Audit* to ensure compliance with existing requirements and identify any areas for improvement
- Represent VolkerHighways in communications with the Health & Safety Executive, and other external enforcing authorities or organisations
- Ensure that reports are compiled where necessary to enable corrective action to be implemented by site management
- Ensure thorough investigation is undertaken and appropriate records are compiled where accidents and incidents occur, and make recommendations to prevent reoccurrence
- Advise on health & safety training requirements
- Ensure that VolkerHighways occupational health & safety management documentation is appropriate and maintained to reflect any changes in legislation and company requirements
- Maintain their competence through continual professional development
- Adhere to the professional code of conduct as set through membership of the Institute of Occupational Safety and Health (IOSH) and / or the International Institute of Risk and Safety Management (IIRSM)
- Identify opportunities for improvement
- As part of the Protect our People Behavioural Change programme, develop and deliver the presentations to the coaches on individual contracts.

Corporate Responsibility Director

The Corporate Responsibility (CR) Director is responsible for the implementation and development of sustainable business practices throughout VW UK shared services and business units, to maintain compliance to corporate, legal, and stakeholder requirements. Reporting to the VW UK CEO, the responsibilities of the Corporate Responsibility Director are:

- Oversight of health, safety, environment, quality and sustainability activities and staff across VW UK business units
- Oversight of corporate governance and risk management
- Development of CR strategy through a strategic view of the business environment
- CR management reporting and communications within VW UK and to VolkerWessels
- Management of the integrated management system, its related systems and applicable memberships, affiliations and registration schemes
- Provision of occupational health services to VW UK and its business units
- Commitment to the growth and development of employees, including the delivery of training services and external course provision
- Development of sustainable business practices including the selection and integration of tools and techniques
- Understanding the role of government, business, NGOs, society, global and local issues and how they interact with each other and their impact on VW UK
- Development of systems and protocols, including IT platforms, to support the needs of the business
- Lead officer for major incidents and provision of legal support services

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1.0 ORGANISATION AND ARRANGEMENTS (CONTINUED)

1.3 RESPONSIBILITY FOR HEALTH & SAFETY (CONTINUED)

Integrated Management Systems Managers

Reporting to the Corporate Responsibility Director the Integrated Management Systems (IMS) Managers are responsible for:

- The coordination of activities related to the implementation, development and maintenance of the OHSMS
- Control, publishing and maintenance of the IMS within Workspace (our Business Management System)

Contracts Management / Operations Management / Build Managers / Site Supervision

It is the responsibility of Contract / Site Management to:

- Be familiar with and observe all relevant statutory provisions applicable to construction and related industries
- Implement the company's procedures for dealing with subcontractors and ensure proper cooperation and coordination takes place between the various parties who may share the workplace / site
- Provide an overall Health & Safety Plan for each project, making an adequate assessment of the risks involved, and ensuring that safe systems of work and method statements are produced, followed and reviewed
- Ensure activity and / or substance-specific assessments under the Control of Substances Hazardous to Health (COSHH) Regulations are made and communicated to those at risk
- Ensure employees, self-employed, temporarily employed, trainees and non-employed persons have received adequate training and information about the activity they are required to undertake, particularly by ensuring induction is provided for those attending a location for the first time
- Ensure employees are aware of the company's policy for health and safety at work and that they have understood its requirements
- Liaise with others as applicable and support initiatives for health and safety representation
- Ensure proper protective equipment is provided, maintained and used
- Report all accidents and incidents to the appointed Health & Safety Manager, carry out investigations, make recommendations to prevent recurrence and ensure this information is effectively communicated
- Arrange 4-weekly health & safety planning meetings with the appointed Health & Safety Manager
- Ensure that weekly safety inspections are carried out, including maintenance of appropriate inspection records
- Ensure proper arrangements are made for the safe evacuation of workplaces and that they are under the control of trained and competent people
- Implement the advice given by the company's appointed Health & Safety Managers
- Attend health and safety training arranged by the company
- Provide effective front-line supervision on site and ensure operatives are instructed in the detail of safe systems of work as it applies to particular construction operations.

Site Foremen / Gangers / Supervisors

It is the responsibility of Supervisors, Foremen and Gangers to:

- Ensure operatives are suitable, competent, trained and authorised to carry out the work, particularly where mechanical plant and equipment is involved
- Provide effective front-line supervision on site and ensure that operatives are instructed in the detail of safe systems of work as it applies to particular construction operations
- Encourage the workforce to work in a safe and tidy manner, in accordance with our minimum standards or identified by risk assessment paying particular attention to the wearing of personal protective equipment (PPE) and where necessary, disciplining offenders
- Be familiar with and observe all relevant statutory provisions applicable on site and take immediate action in respect of advice given by the company's appointed Health & Safety Managers
- Cooperate and liaise where appropriate with other contractors' site supervision

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1.0 ORGANISATION AND ARRANGEMENTS (CONTINUED)

1.3 RESPONSIBILITY FOR HEALTH & SAFETY (CONTINUED)

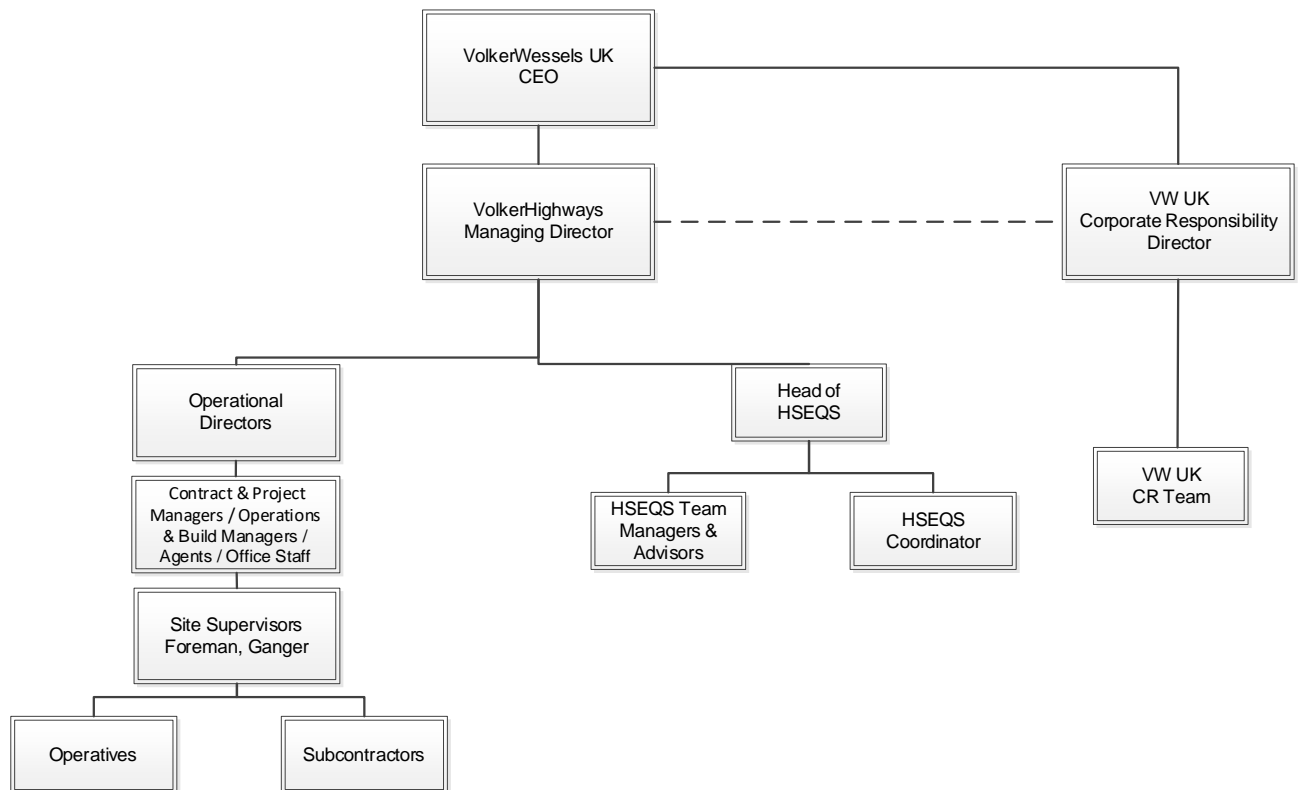
All Employees, Subcontractors and any other Persons Working on our Behalf

It is their responsibility to:

- Be familiar with the Occupational Health & Safety Policy and cooperate with management / supervision in its implementation
- Understand the parts of the Health & Safety Policy applicable to them and take reasonable care for the health and safety of themselves and others
- Follow the instructions given regarding safe working in general and safe methods of work for particular tasks
- Keep equipment in good order, use the correct equipment for the task, and report any defects in plant and equipment or any shortcoming in safe systems of work to their manager / supervisor
- Contribute to the safety culture, be aware of relevant site safety rules and abide by requirements
- Use and not abuse the protective equipment and measures provided in the interests of health and safety

1.4 ORGANISATION AND STRUCTURE

The company is managed by the board of directors, with the structure for health and safety management as detailed below:



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1.0 ORGANISATION AND ARRANGEMENTS (CONTINUED)

1.5 INTERESTED PARTIES

BS ISO 45001:2018 requires the Interested Parties (including workers) of an organisation to be determined; Interested Parties include people or organisations that can affect, be affected by, or perceive themselves to be affected by a decision or activity of VolkerHighways / VolkerWessels UK.

VolkerHighways understands the importance of meeting the requirements of its Interested Parties. Interested Parties (including their needs and expectations) that are affected by the VH OHSMS include:

Interested Parties	Needs and Expectations
<ul style="list-style-type: none"> VH Employees & other VW UK business unit employees 	<ul style="list-style-type: none"> Quality of work / life, job security, challenge, personal and professional development, career opportunities.
<ul style="list-style-type: none"> Shareholders (e.g. VW NL) 	<ul style="list-style-type: none"> Sustainable growth and profitability.
<ul style="list-style-type: none"> Sub-contractors 	<ul style="list-style-type: none"> Surety of work, paid on time, collaborative working, respectable working environment, desire to work with a responsible organisation.
<ul style="list-style-type: none"> Clients 	<ul style="list-style-type: none"> High level of service delivery, on time and on budget, in line with client expectations.
<ul style="list-style-type: none"> Customers 	<ul style="list-style-type: none"> High level of service delivery, on time and on budget, in line with requirements and expectations.
<ul style="list-style-type: none"> Suppliers 	<ul style="list-style-type: none"> Information of what is required and when, payment terms are met.
<ul style="list-style-type: none"> Competitors (Joint Ventures) 	<ul style="list-style-type: none"> Clear communication of requirements (contractual and of QMS), compliance to agreed QMS, objectives and terms.
<ul style="list-style-type: none"> Industry bodies e.g. Highways Electrical Association (HEA), etc 	<ul style="list-style-type: none"> Sharing knowledge, source and share best practice, influence positive changes in the industry

The below interested parties may affect VH QMS but may not be affected by VH QMS directly.

Interested Parties	Needs and Expectations
<ul style="list-style-type: none"> Government agencies 	<ul style="list-style-type: none"> Compliance to applicable requirements.
<ul style="list-style-type: none"> Regulatory bodies 	<ul style="list-style-type: none"> Compliance to all regulatory and statutory requirements.
<ul style="list-style-type: none"> Local community 	<ul style="list-style-type: none"> Considerate construction company when working within local communities, social responsibility.
<ul style="list-style-type: none"> General Public 	<ul style="list-style-type: none"> Minimal disruption to their everyday lives, enhancing the infrastructure and communities.

Q19 *Determining the Context of our Organisation* further explains our Interested Parties.

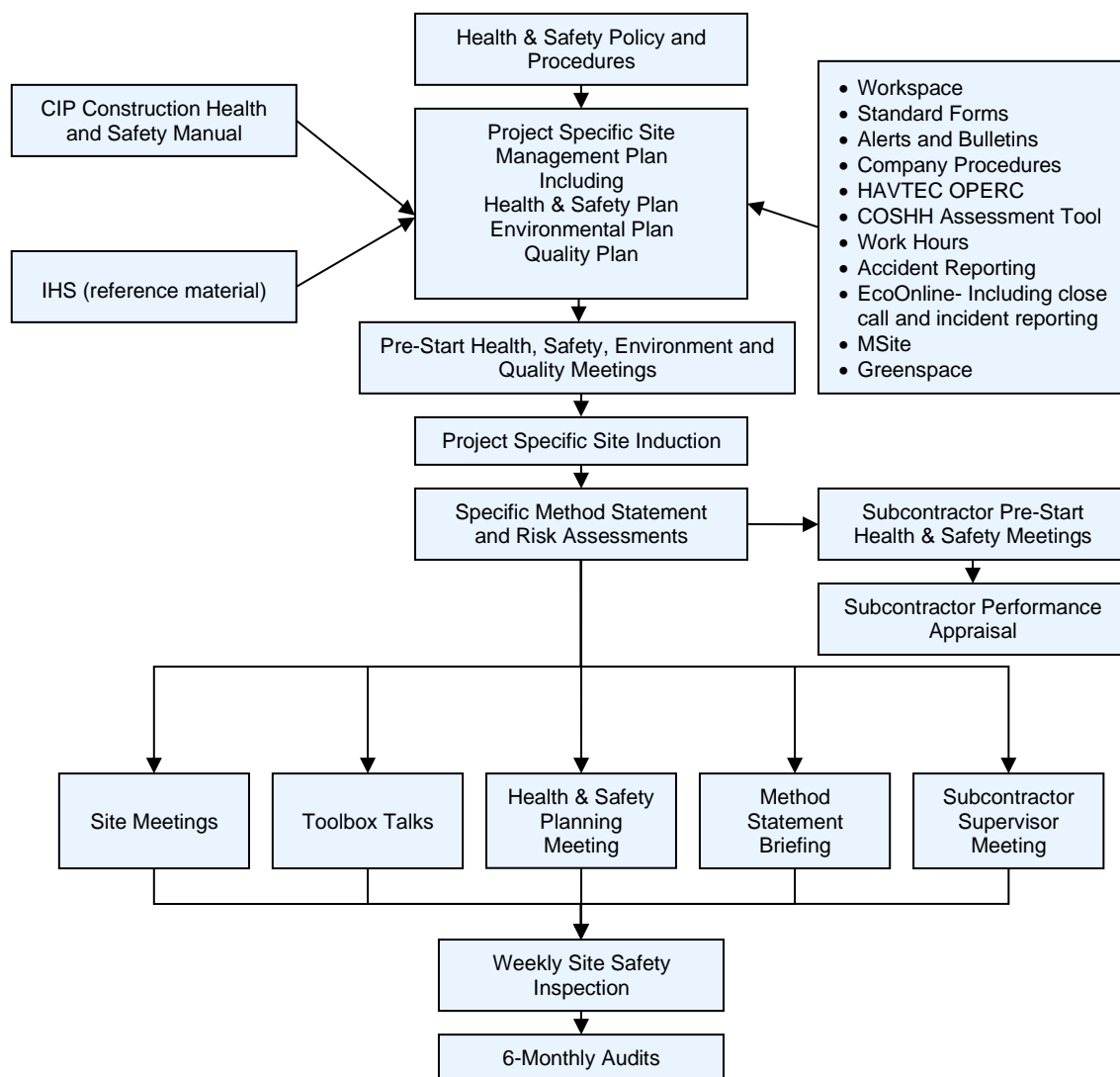
1.0 ORGANISATION AND ARRANGEMENTS (CONTINUED)

1.6 STRUCTURE OF SAFETY MANAGEMENT SYSTEM

The company has an Occupational Health & Safety management system (OHSMS) to support the implementation of the policy and is stored on Workspace, which provides access to:

- Policies and procedures
- Site documentation
- Health and safety forms
- Alerts and bulletins
- Health and safety objectives and targets
- RIDDOR performance
- Best practice guidance
- Links to external web-based based health and safety information

The system is shown in outline below:



1.0 ORGANISATION AND ARRANGEMENTS (CONTINUED)**1.7 MONITORING AND REVIEW**

The *Occupational Health & Safety Policy and Practice* will be monitored and reviewed by:

- Internal and third-party inspection, audit and monitoring of our activities
- Safety performance monitoring (close calls, hazards, near misses, accidents)
- Comparison with current, new and proposed legal requirements or best practice
- Meetings carried out with directors, senior managers and health and safety management

1.8 COMPETENCY

We take care that the Operational Directors and Business Leads allocate responsibilities to those who have the appropriate competence (skills, knowledge and experience) for their role.

VolkerHighways is committed to offering training opportunities for all employees, and training needs are identified at annual Development Performance Reviews (DPR). Training can be undertaken either through a formal or informal approach, after which it is evaluated and recorded by the relevant team who also retain copies of certificates and cards that have been gained.

Functional roles are outlined in job descriptions where identified as appropriate for the role concerned.

Appropriate training will be identified and provided to all levels of VolkerHighways' managerial and operational employees. Training may comprise of safety inductions (MSite), toolbox talks, method statement briefings, in-house training courses and specialist external training courses.

Training requirements are assessed both at commencement for new employees, and on an on-going basis for existing employees. The capabilities and expertise of our management / supervisory employees is assessed at safety management meetings and personal development reviews. Operational employees' training is assessed at site induction by supervisors (MSite) on site, during working operations and during toolbox talks, when two-way discussion is encouraged.

All site personnel will receive either a formal, signed off induction talk given by a member of the site management team or complete an online induction through MSite, which will include both general and site-specific requirements. All site personnel will also receive a site orientation briefing as part of the induction process.

Evaluation forms are required to be completed by each person attending training courses which help assess the effectiveness of training courses and to identify further training needs.

Training records are maintained by the training department. Plant and equipment operators are required to provide evidence of training and competency, e.g., CPCS card.

The company is fully committed to a fully qualified and certificated workforce and supports the Construction Skills Certificate Scheme (CSCS) and other industry approved registration schemes. It is our aim to have 100% of the workforce holding CSCS cards or an approved equivalent.

Training is provided for operatives and supervisors in accordance with the New Roads and Street Works Act for work on highways where necessary. and other industry specific requirements such as HERS portfolios, NERS passports, NOPS passports (Smart Awards) and Highways Sector Schemes (NHSS)

1.9 CLASSIFICATION OF WORKFORCE

VolkerHighways' aim is to ensure the health, safety and wellbeing of its employees whilst at work and to provide a consistent and timely set of processes, to ensure that any health issues are identified and addressed. In doing so it is recognised that not all employees are exposed to the same level of risk. Accordingly, workers can be considered in the following three categories in terms of personal or workplace safety issues:

- Office and admin posts
- Site management / general duty construction
- Safety critical

An in-house occupational health service is available from the VW UK Occupational Health Nurse and the level of service provided will be based on a health questionnaire and assessment of risk for each group.

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2.0 RISKS & OPPORTUNITIES AND OCCUPATIONAL HEALTH & SAFETY PLANNING

2.1 INTRODUCTION

One of the fundamentals of occupational health & safety planning is to determine the risks and opportunities to be addressed towards:

1. Giving assurance that the OHSMS can achieve its intended outcomes
2. Prevent, reduce, or otherwise mitigate undesired effects
3. Achieve continual performance improvement

The determination of risks and opportunities must include the identification of hazards, the assessment of risk and opportunities, and the meeting of legal and contractual requirements.

Hazard means a source, or a situation with a potential for harm in terms of human injury or ill health, damage to property, damage to the environment, or a combination of these.

Hazard identification is the identification of undesired events that lead to the materialisation of the hazard and the mechanism by which those desired events could occur. This includes long-term hazards to health (e.g. high levels of noise or exposure to harmful substances).

In its most simple terms, risk is a concept involving the possibility of an adverse outcome, and the level of certainty / uncertainty over the occurrence, the timing, or the magnitude of an adverse outcome. If either of these is absent, then there is no risk.

Risk assessment is a systematic process for describing and quantifying the risks associated with hazardous actions, or events, substances, or processes.

Hazard identification and risk assessment is the responsibility of the relevant manager for sites, offices and operational locations with the assistance of the Health & Safety Manager.

The principles of prevention to be applied are as follows:

- Avoiding risks
- Evaluating the risks which cannot be avoided
- Combating the risks at source
- Adapting the work to the individual, especially as regards to the design of workplaces, the choice of work equipment and the choice of working and production methods, with a view, in particular, to alleviating monotonous work and work at a predetermined work-rate, and to reducing their effect on health
- Adapting to technological progress
- Replacing the dangerous by the non-dangerous or the less dangerous
- Developing a coherent overall prevention policy which covers technology, organisation of work, working conditions, social relationships and the influence of factors relating to the working environment
- Giving collective protective measures priority over individual protective measures
- Giving appropriate instructions to employees

All risk assessments shall be reviewed by the relevant manager if there is a reason to suspect it is no longer valid or there has been a significant change in the matters to which it relates. Office risk assessments shall be carried out and reviewed as necessary.

2.0 RISKS & OPPORTUNITIES AND OCCUPATIONAL HEALTH & SAFETY PLANNING (CONTINUED)

2.2 THE COMPANY APPROACH

Activities with risks to Health and Safety are considered at the HSE-01 *Health and Safety Planning Meeting Agenda* / HSE-60 *Health, Safety, Environmental and Quality Planning Meeting Agenda*. From the tender programme the principal activities with any HSEQS risk will be referenced within H02-01 *Risk Assessment and Method Statement Schedule*.

Risk assessments detailed in the pre-construction information, together with further risk assessments deemed necessary including those for activities carried out by other contractors, shall be reviewed and approved for use.

The arrangements to safely execute the works are examined and planned. Within this process significant attention is paid to hazards and risks associated with the works. Where a significant risk has been identified in the meeting, a specific assessment shall be produced. Preventive and protective measures must be established, recorded and communicated to all relevant employees, and their ongoing effectiveness monitored and reviewed.

Method statements* shall be produced for all activities where significant risk has been identified. They shall contain details of safe methods of work and be used to communicate them to those persons involved in the work. This will be achieved through method statement briefing prior to the commencement of the works. Method statements* and risk assessments shall be authorised by VolkerHighways management, before work commences.

Residual risk following the implementation of control measures to reduce risk to as low as reasonably practicable (ALARP) shall be reviewed as the works are executed or if change(s) are identified.

**note, other systems are applied such as Work Package Plans and Task Briefing Sheets for Network Rail*

Regulations requiring risk assessment are considered and reviewed at the health & safety planning meeting and throughout the contract period and include, but are not limited to:

- Manual Handling
- Personal Protective Equipment
- Display Screen Equipment
- Noise at Work
- Fatigue Management
- COSHH
- Asbestos
- Lead
- Hand Arm Vibration
- Whole Body Vibration
- Work at height
- Fire
- LOLER
- PUWER

2.3 THE HEALTH & SAFETY PLANNING MEETING

Prior to construction commencing, a health and safety planning meeting shall be held to discuss formulation of a Health & Safety Plan as part of an integrated Site Management Plan and its subsequent implementation. This meeting will be attended by the Contracts / Project Manager, Agent, appointed Health & Safety Manager and others as appropriate. H02-02 *Qualitative Risk Assessment and Method Statement Template* or H02-03 *Quantitative Risk Assessment and Method Statement Template* are reviewed as part of this agenda, the requirements are established for site specific risk assessments coupled with any additional activities and associated hazards.

H02-G01 *Risk Rating Matrix* is utilised to provide guidance to ensure a consistent approach and risk rating score where a quantitative risk assessment is used.

Approved for IMS:	IMS Manager	Document owner:	Head of HSEQS	Workspace file:	n/a	Page 15 of 31
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2.0 RISKS & OPPORTUNITIES AND OCCUPATIONAL HEALTH & SAFETY PLANNING (CONTINUED)

2.3 THE HEALTH & SAFETY PLANNING MEETING (CONTINUED)

The hazards and risks identified in the pre-construction information shall be assessed and developed where the Construction (Design and Management) Regulations 2015 apply.

Activities which are likely to produce significant risks requiring specific risk assessments and those areas of construction operations which are likely to require detailed method statements, shall be identified and recorded for action at the meeting.

A Health & Safety Plan shall be produced, to further develop the pre-construction information and the items identified at the safety planning meeting. This will include details of consultation arrangements with employees and workers.

Specific assessments shall also be considered at this meeting to address COSHH, noise, PPE, manual handling etc. and shall be included in the respective method statement or compiled and maintained separately.

On a four-weekly basis, site safety meetings will be held to plan, monitor, review and update the health & safety systems on site.

2.4 MANAGEMENT OF SUBCONTRACTORS & OUTSOURCING

2.4.1 SUBCONTRACTORS

All tender enquiries to subcontractors indicate VolkerHighways' safety requirements. Prior to appointment it shall be emphasised to the relevant representative or manager of the subcontractor that VolkerHighways expect full cooperation from them in achieving the required health and safety standards.

As part of the process of selecting subcontractors their health and safety performance will be reviewed to confirm an acceptable health and safety management system is in place. Audits, accident and performance records and the taking of references will be implemented as appropriate in accordance with company procedures to ensure competent contractors are employed and sufficiently resourced.

Prior to commencing work, subcontractors will attend a subcontract pre-start health & safety meeting to plan and develop safe systems of work for the identified scope of works.

At regular intervals the contract / project manager will convene meetings with the site representatives of all sub-contractors to discuss safety performance. These meetings will provide an opportunity for subcontractors to make an input into the safe management of the site.

All subcontractors must notify VolkerHighways and gain approval of their intention to subcontract any elements of their work and employment conditions.

VolkerHighways will conduct a one-to-one interview with all proposed subcontractor supervisors to ensure they are competent and share our commitment and values towards health, safety, environment and quality.

2.4.2 OUTSOURCING

External organisations are fully responsible for their own management processes and procedures. However, where they are providing a function, service, or site activity under VolkerHighways management they will fall within the scope of our occupational health & safety management system. Therefore, all service or product suppliers (including those undertaking pre-fabrication or assembly) are required to comply with all appropriate legal and contractual requirements with regard to VolkerHighways occupational health performance standards. This is described within the formally agreed procurement terms.

2.5 DOCUMENTED INFORMATION

2.5.1 CONTROL OF DOCUMENTED INFORMATION

Documented information can be in any format and media and from any source. Documented information can refer to:

- The occupational health & safety management system itself, including related processes
- Information created in order for the organisation to operate (documentation)
- Evidence of results achieved (records)

To operate in a consistent manner, and to meet legal, corporate, client and other requirements we maintain an Integrated Management System (IMS) which includes all VW UK policies, procedures, forms, standards, and reference information.

Q01 *Control of Documented Information - Overview* describes the business approach towards control. Q01-01 *Control of the Integrated Management System (IMS)* defines how we establish, create, format, reference, control, and make available the IMS documentation. This document also defines how we control the IMS screens and other storage areas within the document management system including the document library and the project folder structure.

2.5.2 CONTROL OF RECORDS

Q01-02 *Control of Records and Workspace on Projects* defines the controls for retaining documented information, including but not limited to construction information, specifications (including drawings) and records (completed forms, plans or emails). It includes guidance on project-based document storage and access to records through the document management system and permissions determined by folder security and individual employee access rights.

Q01-03 *Control of Records and Workspace in Offices and Departments* defines the controls for retaining documented information, including but not limited to shared services departments and regional business unit offices. It includes guidance on document storage and access to records through the document management system.

Q01-04 *Control of Archiving* defines the controls for archiving project and office records.

3.0 COMPANY HEALTH & SAFETY PROCEDURES

3.1 DEFINITION

This section defines the standards and rules, which complement VolkerHighways' company procedures, CIP construction Health and Safety Manual and Site Management Plans. It is the responsibility of all employees to observe these rules, to behave in a safe and reasonable manner, and to adhere to all instructions given by appointed management with regard to the respective location.

Failure to comply with the following rules will render employees liable to disciplinary action. This may be through the use of the 'Record of Verbal Warning' notices. It should also be borne in mind that a breach of health and safety legislation is a criminal offence and action taken by an enforcing officer may result in heavy penalties i.e. fines and / or imprisonment.

Occupational Health & Safety is the responsibility of everyone: directors, managers, site and office staff, fellow employees and yourself. All persons have a responsibility to contribute towards making their place of employment a safe place to work. Safety measures are introduced to control risks to everyone at the location, including employees, subcontractors, visitors, members of the public and anyone else who could be harmed.

3.2 SITE RULES - HEALTH & SAFETY

VolkerHighways' site rules comprise the following as a minimum and are applicable to all contracts.

- All persons having any business on site must attend an induction and receive and understand a copy of the site rules.
- All persons must report to the site office (as applicable) and sign in before entering the site and sign out on leaving the site.

3.0 COMPANY HEALTH & SAFETY PROCEDURES (CONTINUED)

3.2 SITE RULES - HEALTH & SAFETY (CONTINUED)

- All persons attending site must wear a safety helmet, lace up and ankle high safety boots (rigger type boots are not permitted) with protective toe and midsole protection, high visibility clothing to include long sleeve class 3 vest / jacket and trousers, protective gloves and light eye protection at all times (the site offices and welfare facilities are excluded from this rule).
- Trainers will not be permitted at any time. Visitors shall be made aware of the requirements regarding PPE required for site
- The correct task specific personal protective equipment must be worn at all times as determined by the activity specific risk assessment, e.g. specific gloves, goggles / face shields, masks, ear defenders, FR / ARC protection etc.
- Unauthorised personnel must not alter scaffolding.
- No one is to operate vehicles, plant or machinery, including fitting abrasive wheels and erecting or dismantling scaffolding unless they are appropriately trained or suitably qualified, e.g. CPCS or similar, and must be authorised, in writing by VolkerHighways, to do so (using the H09-09 *Permit to Operate Plant*)
- Excavator operatives who are found to have incorrectly fitted a bucket onto the quick hitch system and not ensured that all associated safety devices are correctly fitted will be removed from site. This is a zero-tolerance issue
- Failure to wear a suitable harness and lanyard connected to a safe attachment point is a zero-tolerance issue.
- The use of handheld mobile phones or other mobile devices while operating plant / vehicles whilst on site is prohibited, except if parked up and the engine switched off.
- Keys must not be left in unattended plant or vehicles
- Defective vehicles (including Light commercial and HGV), plant or machinery must not be used at any time and the defect(s) should be brought to the attention of the site management immediately.
- No person under the influence of drugs or alcohol will be permitted to remain on site.
- Welfare facilities are to be kept clean and tidy at all times.
- Smoking, drinking or eating is only permitted in designated areas
- Warning signs must be obeyed at all times.
- All hazards, near misses, service strikes, close calls, accidents and dangerous occurrences must be reported to the Relevant Supervisor / Manager and H&S Manager and entered on to EcoOnline, and all injuries entered in the accident book
- Operatives using any equipment producing a naked flame or sparks must have within arm's reach a suitable fire extinguisher. The operative must also be in the possession of a Hot Works Permit.
- A Permit to Work is required for any person entering a confined space.
- A Permit to Break Ground is required every time before breaking the ground surface.
- A permit is required when using portable ladders and step ladders
- Only certificated and authorised personnel will be allowed to sling loads or direct cranes.
- Drivers of all excavators and reversing vehicles must have good all-round visibility or be supervised by a competent Plant and Vehicle Marshall.
- It is incumbent upon all operatives to work in a safe manner and not to endanger themselves or other persons by their actions.
- Portable electric tools and equipment shall only operate at 110-volt power or lower, and wherever possible use RCD protection.
- No radios on site.
- All materials used on site which have a hazard symbol on the container / bag, must have a COSHH assessment sheet, which should form part of the method statement. We encourage the use of, where possible, materials that are non-hazardous and friendly to the environment.
- All pedestrian and vehicle control signs must be complied with.
- No persons are permitted to be underneath any unprotected overhead activities.
- Horseplay will not be tolerated.

3.0 COMPANY HEALTH & SAFETY PROCEDURES (CONTINUED)**3.3 ACCIDENT AND INCIDENT REPORTING**

Medical treatment should be sought for injuries sustained at work, no matter how slight and appropriate records shall be entered in the accident book.

All accidents and incidents, diseases, dangerous occurrences and damage to property belonging to VolkerHighways or others, shall be reported to site management and the appointed Health & Safety Manager as soon as it is practicable, so that they may be thoroughly investigated to prevent a recurrence along with being recorded in EcoOnline.

All injuries, diseases or dangerous occurrences suspected of being covered by RIDDOR must be notified to the relevant enforcing authority and appointed Health & Safety Manager as soon as practicable.

A local (site team) investigation shall be held into all accident and incidents, where a formal investigation is not required. Refer to H07 *Investigation and Reporting of Accidents, Incidents and Close Calls* for further information.

All service strikes will be reported to the HSEQS team where a review will be carried out. Refer to H07-08 *Utility Damage or Close Call - HSEQS Investigation Report*.

A formal investigation will be held for all 'RIDDOR' reportable injuries, serious injuries, fatalities, reportable diseases, reportable dangerous occurrences, significant near misses, or any other event warranting formal investigation due to its scale, nature or impact.

The Head of HSEQS in certain situations may request a formal investigation to be carried out for some accidents and incidents that would ordinarily be treated as a local investigation. The Head of HSEQS expects to draw important lessons from a formal investigation.

Formal investigations will be completed by a representative of HSEQS and documented using H07-03 *Formal Accident Incident Close Call or Environmental Investigation Report*.

Records of accidents, direct employee plus subcontract and site personnel numbers, and total hours worked are to be prepared monthly for company safety performance measurement and uploaded onto EcoOnline .

All personnel are encouraged to report hazards, near misses and close calls on our projects using EcoOnline , this can be through mobile device data capture or by desktop data capture and / or form H07-06-VH *Close Call Report Card*. Project teams will ensure these are reviewed, closed out, trends monitored for action and feedback is given to those raising them.

3.4 DELIVERIES

Drivers delivering goods and materials must report to management to receive instructions on when, where and how to unload their vehicle. They must remain with their vehicles, except to visit welfare facilities or offices to deal with paperwork. When outside of the vehicle the driver must wear the appropriate PPE for the site.

Vehicles must not be overloaded. Loads must be evenly distributed, secured and must not project beyond the side or back of the vehicle. The design and construction of the vehicle must be suitable for the load(s). Drivers or operators are responsible for checking the security of their loads. Where necessary, abnormal loads must be formally notified, and a warning vehicle should be in attendance. When vehicles are being loaded, the driver should only remain in the cab if it can protect him from the risks of falling materials / objects and other relevant hazards. When loading and unloading deliveries employees must observe the requirements of the working at height policy.

3.0 COMPANY HEALTH & SAFETY PROCEDURES (CONTINUED)**3.5 ALCOHOL AND DRUGS POLICY**

The *VolkerWessels UK Drugs and Alcohol Policy* is designed to ensure safety by placing and enforcing strict limits regarding the misuse of drugs or alcohol. We ask all VolkerHighways' employees and those working on our behalf, to lead by example, challenge unsafe attitudes and behaviours to establish a workplace free of injury or incident.

All employees, those working on our behalf, and visitors to VolkerHighways' sites or offices must be aware of the requirements of the *VolkerWessels UK Drugs and Alcohol Policy*, and the implications of failing to comply, as part of the site or office induction process.

It is available to all employees on Workspace and copies can be provided on request.

To ensure compliance with this policy you may be required to undergo testing in the following circumstances:

- **New employee screening** - all new employees must undergo screening for drugs and alcohol as soon as practicable after their start date
- **Random** - unannounced random drugs and alcohol screening could take place at any time whilst at work or on duty of any employee, subcontractor, self-employed or agency worker. A minimum percentage of personnel will be subject to unannounced random alcohol and drug screening each year
- **For Cause** - screening to find out whether drugs or alcohol were a factor in an accident or incident, where the person(s) actions or omissions are suspected of contributing to the accident or incident, or the behaviour of the person gives cause to suspect that person is unfit to continue work
- **Transfer or promotion** - any employee who is transferred or promoted to a safety critical post will be screened for drugs and alcohol, even if the employee already holds a safety critical post

All testing is undertaken to ensure that employee's safeguards, confidentiality and dignity are always maintained to a high standard.

3.6 COSHH

When selecting substances or materials for use in any process, preference must be given to the substance or material that produces least risk to personnel and the environment.

COSHH is specifically addressed at internal and subcontractor pre-start meetings with COSHH assessments forming an integral part of the safe systems of work. Further information can be found in H48 *Control of Substances Hazardous to Health*.

3.7 CONSTRUCTION (DESIGN AND MANAGEMENT) REGULATIONS 2015

VolkerHighways recognises their responsibilities under the Construction (Design and Management) Regulations 2015 (CDM).

Whilst generally employed as a Principal Contractor and where appointed Principal Designer, VolkerHighways accepts and discharges its responsibilities in order to achieve standards of health and safety performance in excess of the statutory minimum. Please see C03-G03 *Commercial Guidance Note 3 - Principal Designer* for more information.

Project specific arrangements are described in the *Site Management Plan*.

3.0 COMPANY HEALTH & SAFETY PROCEDURES (CONTINUED)**3.8 CONSULTATION & PARTICIPATION WITH EMPLOYEES**

It is a fundamental company belief that the creation of a safe workforce is achieved through clear and effective communication at all levels within the organisation. Our Protect Our People behavioural change programme maintains a culture where our employees and workers contribute to the safe systems of work through active and open participation.

VolkerHighways will ensure that the views of those under our employment and management shall be represented with regard to the implementation, performance evaluation and action for improvement of the OH&S Management System.

Consultation involves listening to employees' views and taking account of what they say before any decision is taken.

Employees will be consulted on matters that affect their health and safety and, in particular, with regard to:

- The introduction of any measures or new technologies
- Arrangements for appointing competent persons
- Relevant health and safety information
- Planning and organisation of any health and safety training

This will be either directly or through elected representatives.

Employees or representatives may make representations to management on potential hazards and dangerous occurrences at the workplace, which affect, or could affect, themselves or others.

Consultation may be carried out during:

- Inductions
- Toolbox talks
- Method statement briefings
- Protect our People briefings
- Subcontractors' progress meetings
- Four weekly HSEQS planning meetings
- Pre-arranged or ad-hoc meetings following any responses to information posted on noticeboards

3.9 EMERGENCY PROCEDURES

Procedures to deal with potential serious and imminent danger and danger areas e.g. first aid, fire and means of escape in an emergency, shall be detailed at each construction site and permanent office location, and detailed within the Health & Safety Plan for construction sites. A competent person shall be nominated to implement these procedures.

3.10 FIRE PRECAUTIONS

A fire risk assessment shall be carried out for all locations to identify necessary arrangements and control measures.

A Fire Plan shall be produced and displayed for permanent offices and appropriate projects to include location of firefighting equipment, fire or smoke detectors, emergency lighting, fire call points and fire exits. Training, appointment of marshals, and evacuation procedures shall be established.

Adequate fire notices and signs shall be prominently displayed, as identified by the fire risk assessment. All emergency procedures pertinent to the work activity shall be adhered to. These procedures will vary from location to location and training will be given.

All fire escape routes, firefighting equipment and fire doors shall be kept free from obstruction and routinely monitored.

Any used or missing firefighting equipment shall be reported to management, who will ensure that it is replaced as soon as possible.

3.0 COMPANY HEALTH & SAFETY PROCEDURES (CONTINUED)

3.11 FIRST AID

The company affirms its responsibilities under the Health & Safety (First-Aid) Regulations 1981 to provide or ensure that adequate equipment, facilities and trained persons are provided, to render first aid.

At least one qualified first aider shall be provided at each work location dependent on the risk of injury or ill health. An appointed person shall be identified at each location who may also be a first aider.

It shall be the first aider's / appointed person's responsibility to ensure that appropriate first aid equipment / facilities are maintained.

3.12 GROSS MISCONDUCT

An employee will be liable to summary dismissal if he / she is found to have acted in any of the following unsafe ways:

- A serious or wilful breach of the safety rules specific to each location
- Failure of a drugs and alcohol test
- Unauthorised removal or interference with any guard or protective device
- Unauthorised operation of any item of machinery, plant or equipment
- Unauthorised removal of any item of first aid equipment
- Wilful damage to, misuse of, or interference with any item provided in the interest of health, safety or welfare at work
- Unauthorised removal or defacing of any label, sign or warning device
- Misuse of chemicals, flammable or hazardous substances, or toxic materials
- Smoking in any designated 'No Smoking' area
- Smoking whilst handling flammable substances
- Horseplay or practical jokes which could cause accidents
- Making false statements or in any way deliberately interfering with evidence following an accident or dangerous occurrence
- Misuse of pneumatic, hydraulic or electrical equipment
- Dangerously overloading any item of lifting equipment
- Overloading or misuse of any vehicles

3.13 OCCUPATIONAL HEALTH

Elements of VolkerHighways' Occupational Health system include:

- **Pre-employment health questionnaire** to ensure the employee is fit and capable for effective performance at work without risk to health
- **Management of work activities to eliminate / reduce risks to health**, including planning, organisation and risk assessment
- **Health surveillance** to evaluate whether there are any adverse effects the work or working environment are having on the individual and to act upon the earliest signs of possible harm
- **Assessment of fatigue**, as it is a significant risk during construction activities due to the safety critical nature of the work. The risk of accidents from cumulative fatigue is well recognised
- **Consideration of new and expectant mothers** - see *VolkerWessels UK Employee Handbook*. The Human Resources Department will notify the Company Occupational Health Nurse. Risk assessment will be carried out on the individual employee concerned

Procedures detailing how these are managed within VolkerHighways are contained within this document and within the company Management System within Workspace.

3.0 COMPANY HEALTH & SAFETY PROCEDURES (CONTINUED)

3.14 HOLES AND VOIDS

The VolkerHighways procedure Q25-VH *Temporary Works* must be followed at all times.

Effective measures must be put in place to prevent falls of persons or materials down holes and voids.

Penetrations and voids should be limited in size and number as far as practicable and have mesh cast in during construction or be fitted with other robust protection such as metal guard rails or covers, which prevent falls through them.

All ground openings must be protected with robust, securely fixed (screwed or bolted, not nailed) and clearly marked (e.g. 'Hole below - Do not remove') covers to prevent the fall of materials or persons through them. Covers should be constructed so that they do not present a tripping hazard.

Protective measures may only be removed when the work is actually taking place in or around the opening and effective measures employed to prevent falls of those working on them. Protective measures must be replaced as soon as practical and be regularly inspected (at least weekly).

3.15 LIFTING OPERATIONS

All lifting operations must be in compliance with the requirements of safety legislation including the Health & Safety at Work Act 1974, Management of Health and Safety at Work Regulations 1999, Provision and Use of Work Equipment Regulations 1998 and most specifically the Lifting Operations and Lifting Equipment Regulations 1998. All lifting must therefore be proven to be planned, supervised and safely executed. The process outlined in H55 *Control of Lifting Operations, Equipment and Accessories* must be followed.

All those involved in the planning, site supervision and carrying out of lifting operations must have the appropriate level of competency for the task being undertaken. VolkerHighways requires that competency checks are undertaken to be assured that all those undertaking roles within lifting operations have the necessary skills, knowledge and experience to carry out their duties.

All lifting operations (crane and / or non-crane) must be covered by an appropriate Lifting Plan(s). The level of detail within such plans will be reflective of the nature and complexity of each lifting operation but must include a Works Package Schedule of Common Lifts.

All Lifting plans must be directly referenced to appropriate risk assessment(s) and development of a method statement(s).

All Lifting Plans must be submitted to VolkerHighways for approval and / or acceptance.

All hired crane, contract hire and subcontractor managed lifting operations, and most specifically multi-crane activities on site must be coordinated via the identified VolkerHighways project Lifting Coordinator.

3.16 LONE WORKING

Lone workers are defined as those who work by themselves without close or direct supervision. Lone working will be designed out where possible and only where absolutely necessary is it to be undertaken. Where lone working is necessary, however brief or minor, a specific risk assessment is required to be undertaken and appropriate control measures put in place.

3.17 MANUAL HANDLING

Lifting and moving loads by hand are one of the most common causes of injury at work. Many injuries result from repetitive operations, but one poor lift can cause permanent and often painful damage.

- Where practicable the need for manual handling shall be eliminated
- Manual handling assessments need to address task, load, work environment and the individuals' capability
- Mechanisation of repetitive operations (i.e. kerbs, cable troughing etc.) will be adopted as the solution

3.0 COMPANY HEALTH & SAFETY PROCEDURES (CONTINUED)**3.18 NO-SMOKING POLICY**

The Health Act 2006 states “all employees have a right to work in a smoke free environment”, and that “premises must be smoke free if they are used as a place of work”.

Therefore, smoking is not permitted in any part of any building, including corridors, lifts, stairways, lavatories, reception areas or entrances and ALL company owned or hired vehicles (excluding ECOP vehicles owned or hired by the driver). Smoking is also prohibited within 5m of any doorway or fire escape.

Smoking is only permitted in a designated “Smoking Area”.

VolkerWessels UK determines that electronic cigarettes (e-cigarettes), products that can be used for the consumption of nicotine-containing vapour via a mouthpiece (vaping), should be treated in the same manner as cigarettes.

This policy applies to all employees, contractors, customers and visitors, and all staff are obliged to support the implementation of this policy. Appropriate “No Smoking” signs will be clearly displayed at all entrances and exits, within the premises, and in company vehicles.

Those who do not comply with the smoking law are liable to a fixed penalty fine and possible criminal prosecution. If you would like further advice or assistance on quitting smoking, please contact Occupational Health on 01992 305045 or the NHS by calling 0300 123 1044 (<http://smokefree.nhs.uk/>)

3.19 NOTICES AND WRITTEN INSTRUCTIONS

- All hazard / warning signs and notices displayed on the premises shall be complied with taking into consideration persons whose first language is not English.
- Where applicable, work permits will be strictly enforced e.g. confined space work, where only authorised persons will be allowed to work.

3.20 OFFICE / WORKPLACE SAFETY

- Electrical installations shall only be installed by a competent person and tested at regular intervals in accordance with the Electricity at Work Regulations 1989.
- Offices shall be kept at a reasonable temperature, be well ventilated and lit.
- Passages and stairs shall be kept clear of obstructions and well lit.
- Flooring shall be kept in a safe condition. Damaged carpeting, liquid spillages etc. shall be reported to management.
- Filing cabinets shall be loaded from the bottom drawers first and only one drawer opened at a time. Storage racking shall be of adequate strength, properly loaded, stable, and securely fixed where possible.
- Great care shall be taken in the storage and use of toxic, flammable and corrosive substances, chemicals and liquids. They shall be stored and used in accordance with the manufacturers’ instructions / COSHH assessment.
- Portable electric tools and equipment shall operate at 110V or lower. Where this is not possible RCD protection shall be used.
- Electrical equipment shall be visually inspected and checked for defects at regular intervals and, if a fault is suspected, taken out of use and checked by a qualified electrician. Trailing electric cables shall be avoided.
- An appropriate maintenance system (e.g. HSE guidance) shall be established for all electrical equipment and records of inspection and testing maintained as necessary.
- Employees who are considered to be DSE users (through display screen equipment assessment) shall be entitled to free eyesight tests and the provision of corrective eyewear if prescribed.
- DSE users will be provided with suitable equipment to establish an ergonomic workstation. Suitable instruction on its adjustment will be provided.
- Adequate welfare facilities shall be provided.
- All dangerous parts of machinery shall be adequately guarded.

3.0 COMPANY HEALTH & SAFETY PROCEDURES (CONTINUED)

3.21 PERMITS TO BREAK GROUND

The following will be implemented as part of the Permit to break ground process:

- Excavator operators and Plant Vehicle Marshals will be briefed on the H14 *Safe Working Procedure for Working in the Vicinity of Underground and Overhead Services* prior to commencing work
- Subcontractors will provide personnel trained to operate Cable Avoidance Tools (GENNY / CAT) if required to carry out excavation works
- During excavation re-scanning with the CAT will continue every 100mm
- 500mm exclusion zone of mechanical plant and equipment in relation to known or suspected services

3.22 PERMITS TO WORK

Permit to work requirements shall be determined by the site agent / manager and appointed Health & Safety Manager for all locations. Employees must check to see if such a system is in place for the work that they are undertaking before commencing.

All permits to work shall be prepared by an authorised, competent person who is familiar with the relevant work procedures, hazards, and all necessary precautions after a thorough assessment has been carried out. The person responsible for carrying out the works shall sign the permit prior to work starting, confirming that they are aware of the conditions laid down within it and agreeing to abide by them.

On the completion of the works or expiry of the permit, the person responsible for carrying out the works should either:

1. Sign the permit off as work completed and all personnel, materials and equipment withdrawn or,
2. Request an extension from the competent person, and ensure authorisation is given by the authorised person

In the event of an emergency occurring wherever a permit to work is in operation, personnel will be removed; the permit shall be withdrawn and cancelled immediately. Work shall only recommence when all procedures have again been checked and the permit has been re-issued, duly signed by the authorised person. Where there has been a change to the working environment which introduces new or unknown hazards, work shall cease immediately, and all personnel shall be withdrawn from the affected area. If possible, equipment shall be withdrawn and the area made safe.

Permits will be required for the following activities:

- Confined spaces (H103-02 *Permit to Enter a Confined Space*)
- Excavation / breaking ground (H14-01 *Permit to Break Ground (Trial Holes Only)* / H14-02 *Permit to Break Ground (Main Work Activities)* / H14-03 *Permit to Break Ground (Transient or Reactive Works)*)
- Hot works (HSE-27 *Hot Works Permit*)
- Demolition (HSE-40 *Permit to Demolish*)
- Steps and Ladders Permit (H04-01 *Portable Ladders and Stepladders Permit*)
- Plant operation (H09-09 *Permit to Operate Plant*)
- Lifting operations (H55 *Control of Lifting Operations, Equipment and Accessories*)
- Temporary works (Q25-09-VH *Temporary Works Permit to Load*, Q25-10-VH *Temporary Works Permit to Excavate*, Q25-11-VH *Temporary Works Permit to Strike Remove*)

This list is not exhaustive, and all operations should be examined in detail and permits initiated if necessary. A permit to dig system will however be implemented on all sites where there is ground level surface breakout, excavation or filling.

3.23 PERSONAL PROTECTIVE EQUIPMENT

The company recognises its responsibility under the Personal Protective Equipment Regulations to assess the risks, to provide and train personnel in the use of suitable PPE and to maintain and replace this as necessary. Therefore:

- Protective equipment shall be used, stored and maintained in accordance with manufacturer's instructions and the training provided
- Any damage, loss, fault or unsuitability of protective equipment shall be reported to management
- VolkerHighways will issue suitable protective equipment to directly employed staff and operatives (all workers under PPER 2022) free of charge, and undertake to replace such equipment whenever necessary

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3.0 COMPANY HEALTH & SAFETY PROCEDURES (CONTINUED)**3.24 RESPIRATORY PROTECTIVE EQUIPMENT (RPE) FACE-FIT TESTING**

It is a legal requirement that those individuals, who must wear respiratory protective face equipment, are face fit tested to ensure they are worn correctly to protect them from ill health from hazardous substances, therefore any individual attending a VolkerHighways' project without proof of face fit testing, will not be permitted to commence any works which require the need to wear respiratory protective equipment.

3.25 PLANT & WORK EQUIPMENT

VolkerHighways requires all plant and equipment used on site to comply with the Provision and Use of Work Equipment Regulations (PUWER) 1998, and the Lifting Operations and Lifting Equipment Regulations (LOLER) 1998 as applicable.

Further information can be found in H09 *Working with Plant* and H55 *Control of Lifting Operations, Equipment and Accessories*.

All work equipment (heavy excavation plant to handheld tools) must be suitable for the purpose for which it is intended.

To be able to work as safely as possible it is essential that work equipment is maintained and inspected by a competent person, in accordance with legal requirements and manufacturers' recommendations. Records of inspection, test and thorough examination are required to be maintained.

Operation of any machine, plant or equipment is not permitted unless employees have been trained, authorised, or is under adequate supervision. Operatives must not use mobile phones or 'hands free' whilst operating plant.

All machine guarding shall be utilised.

Any fault, damage, defect or malfunction of any machinery, plant, equipment, tools or guards shall be reported to management for action, which may include taking the item out of use.

Repair, maintenance or cleaning of machinery, plant or equipment shall only be carried out in accordance with manufacturer's recommendations and risk assessment where appropriate. No repairs or maintenance work on any equipment shall be undertaken unless employees are trained and authorised to do so, including changing of abrasive wheels.

No machinery, plant or equipment shall be left in motion, or with the engine running, whilst unattended. Plant and vehicles must be immobilised, and the ignition key removed whilst unattended, keys must be kept in a secure place when not in use. The use and control of Mobile Elevated Work Platforms (MEWP's) must observe the minimum standards as stated in (H50-VH *Van Mounted MEWP Minimum Standard*)

3.26 VIBRATION

VolkerHighways recognises Hand Arm Vibration Syndrome (HAVS) as a serious cause of concern for persons using handheld vibratory tools, particular those of a rotary or percussive nature.

It is necessary to limit exposure to Hand Arm Vibration using the following methods listed in order of priority:

1. Eliminate the hazard by substitution i.e. use of machine mounted breakers, crushing concrete, diamond drilling etc.
2. Use of low vibration equipment in preference to standard tools
3. Reduce the length of exposure, for example through job rotation

These preventative measures need to be applied in conjunction with the provision of information and training for workers and their supervisors together with the introduction of health surveillance.

The specific control measures to limit exposure to vibration needs to be documented in a risk assessment which clearly defines measures to reduce or prevent exposure.

VolkerHighways will comply with the legislative requirements in respect of hand and whole-body vibration by providing information and monitoring and recording exposure.

For more guidance on Hand Arm Vibration, refer to H13 *Control of Vibration at Work* and H13-PM01 *Control of Vibration at Work Process Map*.

3.0 COMPANY HEALTH & SAFETY PROCEDURES (CONTINUED)

3.27 VEHICLES

- Regular checks of vehicles, in conjunction with company procedures and manufacturer's recommendations, shall be carried out prior to use and any defects identified reported to a Supervisor or line manager and if necessary, a replacement vehicle organised.
- Gate checks will be carried out by Managers / Supervisors using F01-10 *Gate Check Sheet*
- Driving or operating any vehicle is not permitted without the appropriate driving licence, competency or authorisation.
- Unauthorised passengers or unauthorised loads shall not be carried.
- Vehicles shall not be used for unauthorised purposes.
- Vehicles shall not be loaded beyond the stated capacity.
- Driving or operating vehicles whilst suffering from a medical condition or illness that may affect ability is not permitted.
- Driving or operating vehicles whilst under the influence of alcohol or any other drug, which may affect operating ability, is not permitted.
- All available safety features such as seat belts shall be utilised.
- Use of mobile phones in vehicles whilst driving is restricted to hands free use only.
- All personnel driving at work will be required to comply with *VolkerWessels UK Driving for Work Policy and Handbook*.

3.28 WELFARE

The company will provide suitable and sufficient welfare facilities as detailed in the Workplace Health, Safety & Welfare Regulations or CDM 2015 Regulations as applicable.

3.29 WORKING AT HEIGHT

Working at heights is a high-risk activity which requires the closest attention to detail at all stages of the work. There is no 'safe height'; anyone who is off the ground is at risk of falling.

Safe work at height shall be managed through the hierarchy of:

- AVOID the risk by not working at height - where it is reasonably practicable to carry out the work safely other than at a height do so.
- PREVENT falls - where it is not reasonably practicable to avoid work at height, you should assess the risks and take measures to allow the work to be done whilst preventing, so far as is reasonably practicable, people or objects falling. This might include ensuring the work is carried out safely from an existing place of work; or choosing the right work equipment to prevent falls.
- MITIGATE the consequences of a fall - where the risk of people or objects falling still remains you should take steps to minimise the distance and consequences of such falls. This also involves the selection and use of work equipment.
- At all stages give collective protective measures (e.g. guardrails, nets, airbags, etc.) precedence over personal protective measures (e.g. safety harnesses).

3.30 WORKING CONDITIONS / ENVIRONMENT

- All employees shall make proper use of all safety equipment and facilities provided to control working conditions / environment.
- Work areas shall be kept clear and in a clean and tidy condition.
- Anyone using a computer / laptop will be required to carry out a DSE assessment (H81-01 *DSE Self-Assessment*) to ensure the risk of MSD (musculoskeletal disorders) is reduced through correct setup of equipment.
- All rubbish and waste materials including chemicals or oils within the working area shall be disposed of using the facilities provided, at correct disposal points and in accordance with the details within the appropriate method statements or specific site arrangements.
- Any spillage of liquids shall be correctly contained / removed as soon as is practicable.
- Chemicals, oils or other hazardous substances shall not be discharged into watercourses, sewers or drains.
- Toilet and welfare facilities provided shall be kept clean and tidy.

3.0 COMPANY HEALTH & SAFETY PROCEDURES (CONTINUED)**3.30 WORKING CONDITIONS / ENVIRONMENT (CONTINUED)**

- Any person found contravening these requirements shall be subject to disciplinary action.
- Personnel shall inspect their work areas continually to ensure they are safe and that no fire or ignition sources are left unattended during or at the end of each working period. Where the activity being undertaken carries any risk of a fire, fully charged extinguishers and precautions to stop flying sparks i.e. fire blankets / screens shall be in place. Where hot work has been undertaken the area shall be checked and any hot spots doused.
- All materials shall be stored in such a manner as to eliminate hazards.
- Warning signs and suitable precautions shall be provided to protect anyone from falls from height.
- Any person found contravening these requirements shall be subject to disciplinary action.

3.31 WORK IN RAIL ENVIRONMENT

Business units within VW UK hold the relevant rail-related licenses, management arrangements and procedures for works in the rail environment. These enable rail work to be conducted safely, efficiently and in compliance with all relevant Railway Group and Network Rail Standards, CTRL, and LUL requirements.

To ensure that implications of new / revised legislation and / or standards (including relevant Rail Standards) these will be reviewed by the Compliance Manager, H&S Manager and Quality Managers quarterly as a minimum.

As part of the review, Operations Directors will be consulted to assess implications of new / revised legislation and / or standards and to determine how the requirements will be met.

3.32 YOUNG PERSONS

Where it is intended to employ young persons, those being under 18 years of age, a specific risk assessment for the type of work they will be involved in shall be carried out in accordance with the Management of Health and Safety at Work Regulations 1999.

Persons under 18 years of age are prohibited from operating lifting appliances and giving signals unless under supervision during training. Special consideration must be made when a person under the age of 21 years is to operate certain vehicles or plant on a public highway, i.e. only if a valid driving licence is held (medium / large sized vehicles etc.).

3.33 TEMPORARY WORKS

Under most forms of contract in use in the UK, the overall project responsibility for temporary works rests with the Principal Contractor. Legal duties cannot be passed on to someone else by means of contract. This means that when VolkerHighways are acting as Principal Contractor, they must approve all temporary works.

Guidance towards VolkerHighways management of temporary works is described within Q25-VH *Temporary Works*. All projects must comply with the requirements set out within the procedure. This includes:

- The formal appointment of a Temporary Works Co-ordinator
- The use of Temporary Works Design Briefs
- Establishing and maintaining a Temporary Works Register
- Checking of Temporary Works during construction / erection, use and dismantling ensuring information is correct and work carried out in accordance with design details

4.0 WORKSAFE PROCEDURE

4.1 The use of permits, such as permission to Load or Strike

VolkerHighways acknowledges its responsibilities under the Health & Safety at Work Act 1974. We also recognise our duty of care and undertake to maintain safe systems of work. We at VolkerHighways operate a Worksafe Policy or (Refusal to Work Policy) for all our staff and subcontractors.

No employee or any subcontractor working for VolkerHighways will be expected to carry out any task where there is a potential risk to themselves - or any other person - which is considered to be unacceptable.

Sufficient training and instruction is provided to ensure the competence of all of our staff. We do not expect any employee or subcontractor to undertake any duties for which they are not competent. They should also have the relevant information specific to the task and have suitable equipment for the work in hand.

We require and expect all employees and subcontractors to work safely at all times and to ensure that others around them work safely. This includes complying with the site rules, site specific procedures and instructions and the wearing of correct and appropriate PPE, including the use of correct tools and equipment.

In those situations where the use or operation of equipment, method of working or other influencing factor(s), which might constitute a danger to staff or others, the employee or subcontractor retains the right to refuse to continue with the work activity.

We accept that the employee or subcontractor may also refuse to carry out a method of working when it puts the health and safety of himself / herself or another person in danger.

Employees and subcontractors who do refuse work on health and safety grounds will be supported and no disciplinary action, financial or other penalty will be imposed.

The escalation arrangements for resolving a refusal to work is firstly through their Line Manager. All reports of unsafe working will be investigated, and the appropriate remedial action taken. Additionally, VolkerHighways will continue to keep the employee and subcontractor informed of decisions throughout the process.

4.2 PURPOSE

All organisations can face the potential risk of things going wrong or of unknowingly harbouring health and safety malpractice.

VolkerHighways believes it has a duty to identify such situations under the Health and Safety at Work Act 1974 and take appropriate measures to remedy the situation. We encourage free and open discussion from all its employees to assist in preventing injuries.

This Worksafe procedure has been developed to allow staff to raise any concerns they may have in relation to health and safety without fear of recrimination.

4.3 SCOPE

This procedure applies to all VolkerHighways staff and its subcontractors.

4.4 RESPONSIBILITIES

The Managing Director

- The Managing Director is responsible for ultimate resolution of any health and safety issues raised by staff that cannot be resolved internally through Line Management processes.

Line Managers / Supervisors

- As direct reports Line Managers / Supervisors must initiate investigation of any concerns raised by staff and provide feedback on the outcome of the investigation.

Health & Safety Manager

- The Health & Safety Manager shall provide any necessary support and assistance in investigation. Providing remedial solutions to health and safety issues reported by staff or contractors.

All Staff

- All staff have a responsibility to raise concerns about Health and Safety issues and, where necessary stop work immediately if they consider they are faced with a situation of serious or imminent danger.

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4.0 WORKSAFE PROCEDURE (CONTINUED)**4.5 PROCEDURE**

- All staff that commence employment with VolkerHighways shall be made aware of the Company Policy on Worksafe as part of their Induction Process.
- Where changes to the Worksafe Procedure are necessary, these will be communicated to staff and contractors.
- The Worksafe procedure will be briefed to all individuals who work on VolkerHighways' sites during induction. Additionally, information on Worksafe will also be made available to those who require it.

Raising Concerns Internally

- Staff should normally initially raise concerns directly through their Line Supervisor / Manager or direct report if working on a subcontract basis.
- If the health and safety issue is serious and is likely to place staff in imminent danger they should immediately stop work until the issue has been resolved.
- Raising concerns whether minor or major, can be done without fear of recrimination.
- Concerns may be raised either verbally or in writing.
- If it is felt that the matter cannot be raised with the immediate Line Supervisor / Manager, then the concerns can then be escalated through the Management Team and, where necessary, directly to the Managing Director of VolkerHighways.

Raising Concerns Externally

- The main purpose of this procedure is to allow individuals the protection required so that they may confidently raise any health matters or safety concerns internally.
- If, however, staff considers that they cannot raise their concerns internally, they are free to raise the issues with the appropriate regulator or statutory body e.g. Health and Safety Executive, Local Authority or CIRAS (Confidential Incident Reporting and Analysis System - for rail related works only). Again, this can be completed without fear of recrimination or disciplinary action. Refer to the *VolkerWessels UK Whistleblowing Policy* on how to raise concerns relating to health and safety or other issues.

Actions by VolkerHighways

- Where an issue is raised, the Line Manager / Supervisor should, where this is considered justified, instigate immediate actions to remedy the situation.
- The Line Manager / Supervisor should inform the Head of HSEQS as soon as practicable.
- After health and safety concerns have been raised and these have not been successfully resolved locally then the Company will decide on how to respond in a responsible and appropriate manner under this policy.
- Initially, internal enquiries regarding the incident will be made, and where necessary an investigation will be carried out.
- If an investigation is required this will normally be by a Senior Manager, not involved at the location of the issue raised.
- Any investigation may be informal (or formal) depending on the nature of the concerns that have been raised.
- As far as is reasonably practicable the company will keep the member of staff raising the concern aware of any decisions taken. They will also be informed of the outcome of the enquires and any investigation carried out.
- The Company will not be able to inform staff of matters that could infringe on the duty of confidentiality to others.

Remedial Actions

- Where remedial actions to deal with the issue raised are considered necessary based on internal enquires / investigations these will be instigated.
- The Company will use the information gathered from enquiries / investigations to look at the lessons learnt.

4.0 WORKSAFE PROCEDURE (CONTINUED)**4.6 REVIEW**

- The Head of HSEQS shall review compliance with this Management Procedure annually.

4.7 REFERENCE / SOURCE DOCUMENTATION

- Management of Health and Safety at Work Regulations 1999.
- Health and Safety at Work Act 1974.

5.0 IMS AUTHORISATION**Document owner approval:**

Jason Convey, Head of HSEQS - 10.01.2023

Approval for IMS:

Alex Boatwright, IMS Manager - 19.01.2023