



Health and Safety Policy Statement, Procedures and Arrangements

Version 10

Table of Amendments and Updates					
Version	Date	Detail	Author	Checked by	Approved by
1	16.06.2016	Issue of first version for consultation	CCA		
2	17.02.2017	Formatting changes, along with inclusion of biosecurity, CDM and Worksafe arrangements	CCA		
3	05.03.2018	Periodic revision of entire policy	CCA		
		Fatigue and stress arrangements added			
		Reformatting and simplification of language throughout policy			
		Update to company structure chart			
		Rewording of incident reporting section			
		Additional text added to sections relating to noise and vibration			
4	07.02.2019	Reformatting and amends made to spelling and grammar	CCA		
5	06.03.2020	Annual review	CCA	SK	RH
6	12.06.2020	Transport Manager added to company structure chart	CCA	SK	RH
7	30.06.2021	Updated structure chart inserted	CCA	SK	RH
		Complete revision to Biosecurity arrangements			
		Revised contents list for method statements			
		Emergency response card contents updated			
		MEWP use amended to include fall prevention systems			
		Further guidance references removed			
		Guidance updated to include 2021 AA Technical Guides			
		Requirements for the use of personal fall protection system within treework updated (work at height)			
		UKCA certification reference added			
OHPL safe working distances in accordance with TG1 included					
8	13.06.2022	Biosecurity and covid arrangements removed	CCA	KF	RH
		Pandemic arrangement added			
9	13.06.2023	Behavioural safety arrangements added Mental health and wellbeing arrangements added Reference to lifting accessories being thoroughly examined including within LOLER arrangements	CCA	JC	RH
10	28.08.2024	Reviewed	CCA	SI	RH

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Richard Hall Ltd Health and Safety Policy

Section One – General Policy Statement

It is the policy of Richard Hall Ltd (“the Company”) to foster a positive health and safety culture throughout the Company because we believe that high standards of health and safety are a moral and commercial prerequisite.

The Company is committed to:


- Providing adequate control of the health and safety risks arising from our work activities through the completion of suitable and sufficient risk assessments.
- Maintaining safe and healthy working conditions, and adequate welfare facilities.
- Providing and maintaining safe plant and equipment, including all personal protective equipment where needed.
- Ensuring safe handling and use of substances that may be harmful.
- Ensuring all Employees are competent to do their tasks, and giving them adequate training, instruction and supervision.
- Working to prevent accidents and cases of work-related ill health.
- Consulting with our Employees on matters affecting their health and safety; and
- Reviewing and revising this policy at regular intervals.

Implementation, maintenance and review

Richard Hall as the Managing Director accepts overall responsibility for all health and safety within the Company and is responsible for all policy implementation.

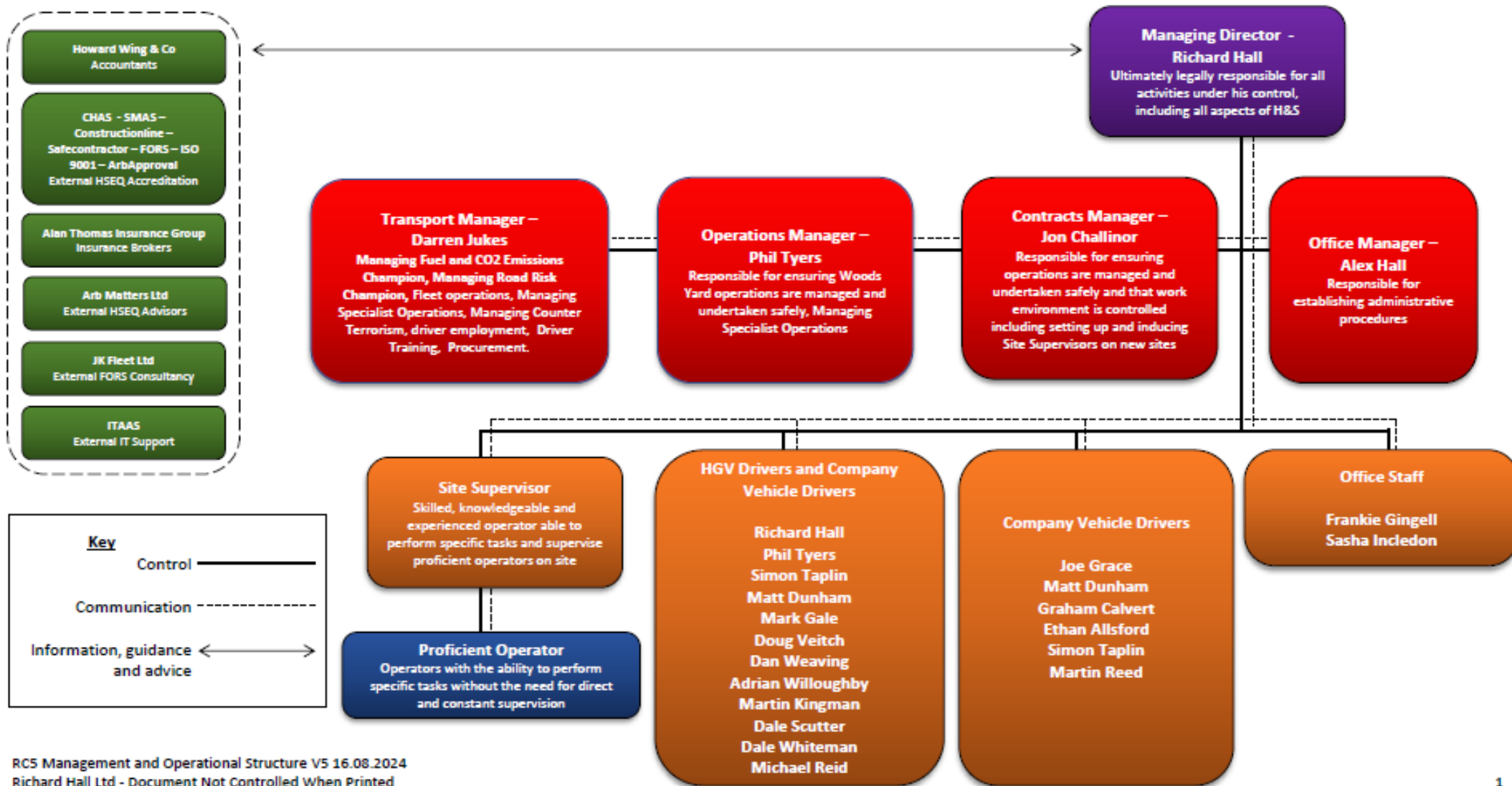
The Managing Director will appoint competent persons to assist with the implementation and maintenance of health and safety policies and arrangements.

As a broad principle, this policy will be reviewed annually. Further specific detail is contained within the section entitled Health and Safety Review Procedures and Monitoring.

Signed by	Richard Hall
Position	Managing Director
Signature	
Date	28 th August 2024
Due date for latest revision	28 th August 2025

Section Two – Levels of Responsibility

The Richard Hall Ltd structure chart below shows the arrangements and responsibilities in place across the Company.



RCS Management and Operational Structure V5 16.08.2024
Richard Hall Ltd - Document Not Controlled When Printed

Introduction

Richard Hall Ltd recognises and accepts its responsibilities under the Health and Safety at Work etc. Act 1974 including the responsibility to:

- provide and maintain a safe and healthy place of work.
- provide information, instruction, training and supervision.
- provide and maintain plant and equipment and safe systems of work.
- ensure safe access to and egress from the places of work.
- to work proactively to prevent accidents and work-related ill health.

General Health and Safety

To achieve the highest possible standards of health and safety within our workplace, the Company will adopt a process of proactive monitoring of performance and the development of a positive health and safety culture within the Company.

The Managing Director will manage Richard Hall Ltd in line with current legislation, guidance and accepted good practice to ensure that all foreseeable hazards are identified, arising risk is evaluated, and suitable and sufficient controls are put in place to ensure and maintain a healthy and safe working environment.

The Company will always consult with Employees on these matters. The Richard Hall Ltd structure chart shall detail the usual reporting lines within the Company. However, anyone at any time shall be provided with the opportunity, if requested, to speak to senior management about any matter relating to health, safety, the environment or quality.

The Company will, so far as is reasonably practicable, ensure that it provides satisfactory financial resources and the support needed to meet these objectives and that systems are in place which ensure the effective planning, control, monitoring and review of the measures and arrangements.

2.1 Duties of the Managing Director (Richard Hall)

1. To oversee health and safety within the Company.
2. To seek generally to improve the record of the Company in respect of health, safety and welfare matters.
3. To review and approve the Company policy relating to the health, safety and welfare at work of the Company's workforce and others affected by its work.
4. To administer the Company policy relating to the health, safety and welfare at work of the Company's workforce and others affected by its work.
5. Advise and liaise with the external advisor on current or proposed legislation, safe working practices and any other matter relating to health and safety.
6. To produce clear and practical guidelines and work systems for Employees to follow, and to give advice and co-ordinate information exchange.
7. To investigate and record accidents and near misses ~~To investigate accidents~~ and liaise with the external advisor regarding recommendations to reduce the potential for further accidents or recurrence.
8. To implement procedures where individuals, fail to discharge satisfactorily the responsibilities allocated to them in respect of health, safety and welfare matters.
9. To proactively visit sites to observe working practices and conduct site safety audits.
10. To ensure that work is planned, supervised and resourced appropriately.
11. To set a personal example and maintain his knowledge of current industry good practice, equipment developments and current legislation by engaging in appropriate continuing professional development.
12. To ensure that anyone involved in the work has the knowledge, training and experience necessary for a full understanding of all the issues involved in the work being considered.

2.2 Duties of the External H&S Advisor (Arb Matters Ltd)

1. To review and advise on the Company policy relating to the health, safety and welfare at work of the Company's workforce and others affected by its work.
2. To give advice generally and to advise on current and proposed legislation.

3. To seek generally to improve the record of the Company in respect of health, safety and welfare matters.
4. To review and approve the guidelines and work systems for managers and Employees to follow.
5. Where necessary complete investigations into accidents and prepare reports with recommendations to reduce the potential for further accidents or recurrence.
6. To make site visits to observe working practices.
7. To set a personal example and maintain its knowledge of current industry good practice, equipment developments and current guidance and legislation by engaging in appropriate continuing professional development.

2.3 Duties of those designated to co-ordinate workplace activities (Operations and Contracts Manager)

1. To understand and implement the Company health and safety policy.
2. Where required prior to operations commencing, complete the relevant risk (and any other) assessments to ensure that all individuals on site are fully aware of the potential hazards.
3. To co-ordinate workplace activities so that they are carried out with the minimum risk to the workforce, contractors and others, following the relevant risk and COSHH assessments.
4. To manage and control site supervisors to ensure that work is conducted effectively and safely.
5. To ensure that those individuals engaged for the purposes of work, have the appropriate attitude, aptitude, physical capability, training and experience to carry out the required work activities.
6. To incorporate safety requirements in routine or site-specific work instructions and ensure that they are understood and followed.
7. To make site visits to observe working practices.
8. To report any special health and safety requirements for activities to the Managing Director in order that the Company policy can be amended as appropriate.
9. To take a direct interest in all health and safety matters and to support publicly all persons carrying out the policy.
10. To set a personal example and maintain his knowledge of current industry good practice, equipment developments and current legislation and guidance by engaging in appropriate continuing professional development.
11. Be responsible to, and for reporting to, management.

2.4 Duties of those designated to organise and control worksite activities (Site Supervisors)

1. To understand and help implement the Company health and safety policy.
2. To always support and co-operate with the Company to achieve the objectives of this policy and the duties imposed on the Company by the Health and Safety at Work Act and associated legislation.
3. To work within safe systems of work specified by the Contracts Manager.
4. To complete the relevant risk assessments, documents, and records required before operations commence on any site and to ensure that all individuals on site are fully aware of the potential hazards.
5. To organise workplace activities so that they are carried out with the minimum risk to operators, contractors and others, following the relevant risk assessments.
6. To manage and control operators to ensure that work is conducted effectively and safely as work activities are undertaken.
7. To ensure that specific work instructions or safety requirements are followed whilst work is being undertaken.
8. To report any defective plant, machinery, equipment and tools in accordance with Company requirements.
9. To set a personal example, work safely upon their own initiative and maintain their knowledge of current industry good practice, equipment developments and current legislation by engaging in appropriate continuing professional development.
10. Be responsible to, and for reporting to, management.

2.5 Duties of Proficient Operators

1. To always support and co-operate with the Company ~~always~~ to achieve the objectives of this policy and the duties imposed on the Company by the Health and Safety at Work Act and associated legislation.
2. To work within the safe systems of work specified by the Contracts Manager and/or Site Supervisor(s), understanding the limitations of their proficiency and experience regarding work practices.
3. To correctly select, configure and use the appropriate plant, machinery, equipment and tools for the task in hand.
4. To inspect tools, maintain them in good condition and complete necessary safety checks.

5. To report any defective plant, machinery, equipment or tools to the Site Supervisor or other designated individual(s) immediately.
6. To ensure the correct return and storage of tools and equipment in use.
7. To contribute towards and play an active part in the undertaking of workplace risk assessments.
8. To wear safety equipment and protective clothing as appropriate to the site, task or machine.
9. All proficient operators will make relevant certificates of competence, training records and other documentation available for inspection by the Company at all reasonable times.
10. To set a personal example, work safely upon their own initiative and maintain their knowledge of current industry good practice, equipment developments and current legislation by engaging in appropriate continuing professional development.

Section Three – Scope of Operational Activities

3.1 Company Overview

Established in 2006, Richard Hall Ltd is a multi-disciplinary company carrying out a wide range of tree and site clearance and agricultural groundworks-based activities. The Company has grown to meet the requirements of a diverse and growing client base. Carrying out contracts in the construction industry and for farming estates, the Company offers a comprehensive range of services including tree felling, tree surgery, stump removal and preparing the ground for agricultural barns, to name but a few.

3.2 Commercial Tree Protection Fencing

The supply and erection of tree protection fencing as specified by the client developer prior to any machine movements or tree works starting on site.

3.3 Commercial Tree and Site Clearance

All aspects of mechanical tree clearance work including tree felling, sectional felling, vegetation clearance, wood chipping, mulching, grass cutting, hedge cutting and stump removal with the aid of the latest technology. These works are carried out within development sites or on farming estates where site boundaries may be adjacent to highways, railways, schools, colleges and watercourses.

3.4 Commercial Tree Surgery

All aspects of tree surgery including tree felling, sectional felling, crown lifting, crown thinning, crown reduction, dead wooding, removal of dangerous trees, hedge cutting and stump removal. These works are carried out within development sites or on farming estates where site boundaries may be adjacent to highways, railways, schools, colleges and watercourses.

3.5 Forestry and Woodland Management

The management of commercial woodlands and forestry areas. The selective removal of standing trees using motor manual and/or mechanised felling and the extraction of timber for sale or offsite utilisation.

3.6 Watercourse Management

Removal of aquatic weeds, de-silting and re-profiling work. The removal of trees and other debris from watercourses.

3.7 Estate Groundworks

Construction of new trackways and roadways, track restoration, ground preparation including drainage and concreting for agricultural barn erections, construction of ménages and construction of grass sports pitches.

3.8 Timber, Wood Chip and Bark Processing

Working with the biomass, biofilter and equine industries to produce bespoke wood chip material to suit.

3.9 Administration

All clerical and financial administration of the principal operational activities is completed from the Company Head Office at Richard Hall Ltd, Woods Yard, Beenham, RG7 5FS.

Section Four – Health and Safety Arrangements and Procedures

4.1 Overview

This section outlines the health and safety arrangements and procedures that relate to all Employees whilst at work. It is the responsibility of all Employees to ensure they are aware of specific workplace arrangements and to follow any procedures laid down by the Company to ensure safe working practices.

The persistent and deliberate flouting of legislative, Company and good practice requirements will be treated with the utmost seriousness. All Employees are reminded that legislative breaches (Acts and Regulations) are criminal offences and may therefore be treated as such by enforcing authorities such as the police, the Health and Safety Executive and/or the local authority.

The management of Richard Hall Ltd expects all Employees to both act in a sensible way and follow instructions provided to help create a healthy and safe working environment. It should be noted that regardless of our position within the Company, health and safety legislation imposes general duties on us all.

These duties include, but are not limited to:

- Taking reasonable care of our own health and safety and that of others who may be affected by our acts or omissions, e.g. wearing appropriate PPE when necessary.
- Co-operating with the Employer (or any other person), so far as is necessary, to ensure the Employer can comply with his statutory obligations, e.g. report hazards, attend training.
- Not interfering with or misusing anything provided to secure health and safety, e.g. removing or tampering with guards.
- Only using the equipment, material or substance provided in accordance with training and instruction.
- Working within the limits of our training and instruction with every Employee informing the Employer of any situation that represents a serious or immediate danger or any shortcoming in the Employer's protection arrangements.

Individuals who are found to be unsafe may be immediately suspended from any worksite until further notice.

4.2 Access to Information

The Health and Safety Arrangements and Procedures section of this policy needs to be read in conjunction with reference to the documents highlighted below. Making this information and guidance available to Employees will help manage their undertakings in line with both legislative and industry requirements.

The following resources shall be made available by the Company:

Electronic Company Library	Electronic resource section containing both internal and external guidance material
Hard-Copy Company Library	Books Industry Standards HSE Guidance Industry Guidance
Competent Advice	Managers have access to industry-specific specialist health, safety, environmental and quality advice from Arb Matters Ltd
Office/Workshop	The Health and Safety Law Poster

4.3 Adverse Event Reporting

All accidents, incidents, near misses and dangerous occurrences must be recorded on a Company adverse event report form at the site where the event occurred, irrespective of whether any injury occurred.

Any reportable accidents, incidents, or dangerous occurrences when applicable will be reported to the enforcing authority by the Managing Director as soon as reasonably practicable.

Definitions:

An **accident** is defined as, “any unplanned event that resulted in injury or ill health of people”.

And **incident** is defined as, “damage or loss to property, plant, materials or the environment”.

A **near miss** is defined as, “any event which under slightly different circumstances may have resulted in injury or ill health of people or damage/loss to property, plant, materials or the environment”.

A **dangerous occurrence** is defined as, “any incident that has a high potential to cause death or serious injury and is specified by the Reporting of Incidents, Diseases and Dangerous Occurrences Regulations (RIDDOR)”.

Richard Hall Ltd will maintain an internal database of all events as defined above. The purpose of this system will be to allow:

1. The Company to learn from adverse events and whether we need to change any of our Company processes.
2. The Company to identify where we need to focus resources, such as training and finances.
3. The Company to measure our performance against our aims to reduce harm from adverse events. Appropriate data collection also allows us a Company to identify potential trends or problems.
4. The correct reporting of any workplace event in line with legislative requirements, e.g. RIDDOR.

4.4 Alcohol and Drugs

It is Company policy to have an alcohol and drug-free workplace. This policy applies to all staff including subcontractors and others working on behalf of the Company.

Alcohol is defined as a drink that contains alcohol and includes ‘low alcohol’ drinks. Drugs are defined as illegal substances, prescribed ‘over the counter’ drugs or the misuse of solvents.

Anyone working for or on behalf of the Company found to have consumed, or be under the influence of, any of the above during normal working hours, including meal breaks, will be excluded from work and asked to leave the site and/or Company premises.

Anyone found in possession of a banned substance on Company premises or during normal working hours will be reported to the police and dismissed immediately.

Any person taking prescribed medication must seek the advice of their doctor before working. Written evidence of their fitness to work whilst taking medication may be required. This record will be held on the Employees personnel file until the course of medication has finished.

4.5 Asbestos

In the unlikely event that any employee or subcontractors encounter any substance suspected to be or contain asbestos, it must be reported immediately to the Managing Director.

All works in the area will cease until the substance has been identified and, if appropriate, made safe or removed by specialist contractors. No works will be carried out that may disturb suspect substances without a suitable asbestos survey having been done by a specialist contractor. If there is any doubt as to whether a substance is asbestos then it should be assumed that it is until proved otherwise.

The Company will ensure that Employees receive asbestos awareness training as part of either their induction or their ongoing employment training programme. A record of this training will be maintained as part of the Company competency matrix.

4.6 Certification and Competence

Where legislation or specific industry guidance requires, Employees will be trained and assessed to a national

competence standard.

A record of all training received, and where applicable qualifications/licence to practise achieved, will be maintained for each person as part of the Company's competency matrix. This record will identify when refresher/update or up-skill training will be required in accordance with specific industry guidance or:

- a) if the risks to which Employees are exposed change due to a change in their working tasks; or
- b) because new technology or equipment is introduced; or
- c) if the system of work changes.

4.7 Communication and Induction Training

The Company will ensure every employee is made aware of the health and safety policy and procedures through a Company 'Induction Training Programme'.

Each employee will be made aware of and assisted in fulfilling their health and safety responsibilities through initial and ongoing consultation.

The Company will communicate changes to the health and safety policy and procedures to all Employees through direct briefing.

Employees shall have access to all relevant industry safety guides and legislative information such as risk assessments, industry good practice, material safety data sheets etc. either in the office or in the workshop as appropriate.

At all sites where work activities take place, Company, industry and HSE information and guidance will be available for Employees to reference. This information shall be reviewed on an annual basis to reflect any changes to legislation, good practice or Company operational procedures.

It is determined as a minimum access to information shall include:

1. Common-factor and point of work risk assessments.
2. COSHH assessments.
3. Emergency protocols.
4. Protected species disturbance/impact assessment.
5. Adverse event report form.
6. Hospital A&E lists and emergency contacts.
7. Company insurance details.
8. Applicable legislative, industry and Company information relating to the control measures as defined within the Company's risk assessments.

It will be ensured that in at least one location to which all Employees have access a Company noticeboard will be maintained. As a minimum this board shall display:

1. Company Health and Safety Policy.
2. Employer's liability insurance certificate.
3. Common-factor risk assessments relating to office and/or workshop, stores and yard.
4. Fire evacuation plan.
5. Employee privacy notice.

4.8 Computer Screens

It will be ensured that suitable assessments are carried out for anyone who regularly uses display screen equipment (DSE). The assessments will consider the amount of time a person uses a visual display unit; their work activities and the usability of their workstation and the general working environment.

4.9 Contractors and Subcontractors

All contractors, sub-contractors, agency staff and consultants will be issued with a sub-contractor's agreement and

this policy which they are subject to, unless they submit their own policy prior to working or the contract starting. Any alternative policy must be scrutinised and accepted by the Company.

All parties as described above will be expected to complete a subcontractors' questionnaire to help the Company determine their suitability, competency and proficiency to carry out their role.

Where contractors or other persons are present on Company premises or worksites controlled by the Company, they will be informed of any known hazards and made aware of emergency action plans.

Copies of the contractor's own safety policy may be required on request.

4.10 Control of Substances Hazardous to Health

The Company will maintain a COSHH inventory and summary for all hazardous substances used, or that Employees may encounter; including plant based bio-hazards and biological COSHH hazards e.g. Giant Hog Weed and communicable diseases e.g. Leptospirosis.

Assessments and all material safety data sheets of hazardous substances (where applicable) will be kept at the Company offices. The Company will ensure COSHH risk assessments are carried out and regularly reviewed. From the risk assessments the management will instigate the principles of good practice for the control of exposure.

COSHH assessments will also be kept at the point of substance storage or provided at locations where substances hazardous to health may be encountered.

4.11 Construction (Design & Management) Regulations (CDM)

The HSE have advised that tree planting and general horticultural work includes topsoiling, grading, amelioration, planting, grassing, agricultural fencing, tree work, soft landscape maintenance and associated preparation (including excavation and site clearance but excluding site clearance of "construction work").

These works are therefore not "construction work" and the CDM Regulations 2015 do not apply to them, even if they are part of a larger project which includes "construction work". The HSE have advised that where such works are carried out as part of a larger project including "construction work" the tree planting and general horticultural work can be addressed separately.

Construction Sites

Where the Company is working on a construction site or as part of a construction design project, it will comply fully with the requirements of the Construction (Design & Management) Regulations (CDM) as required.

Reference will be made where applicable to the 'Managing Health & Safety in Construction ACOP' (L153 revised). In addition to the Company health and safety procedures, full cooperation will be given to the 'Client', 'Principal Designer' in the pre-tender/design stages and/or the 'Principal Designer/Contractor' during construction phases in providing accurate health and safety information. Where the Company has the role of 'Contractor' it will fulfil its obligations in accordance with the CDM Regulations.

4.12 Consultation

The Company will consult with Employees on matters relating to health, safety and welfare and furnish them with the information which is deemed necessary. Such information is to be seen on the Company noticeboards as displayed in the workplace. The Company encourages employees to join in with the spirit of the health and safety legislation and guidance by actively taking part in discussions with their managers.

4.13 Co-operation and Care

To build and maintain a healthy and safe working environment, co-operation between workers at all levels is essential. To achieve this all Employees must co-operate with the Managing Director or their representative in accepting and implementing their duties under this policy.

Action will be taken in accordance with Company procedures against any employee who breaks safety rules or who

fails to perform their duties in accordance with this policy.

The Managing Director has a duty to take all reasonable steps to preserve and protect the health and safety of themselves, their Employees and all other people affected by the operations of the Company.

4.14 Electrical Equipment

The Company shall ensure that all fixed and portable electrical equipment is regularly inspected for both safety and structural integrity. The following timescales and actions shall apply:

Fixed Electrical Equipment

Timescale	Action
Initial Installation	The cabling is certified by an electrician following installation
5 years	The cabling shall be inspected by a qualified electrician
10 years	The cabling shall be inspected by a qualified electrician
The inspection routine shall follow the 5-yearly inspection rota until the equipment is deemed to be beyond its safe useful life expectancy.	

Portable Electrical Equipment

Timescale	Action
0–12 months	The appliance is new and shall be used until the next scheduled inspection
12 months	The appliance shall be tested and inspected
24 months	The appliance shall be tested and inspected
The inspection routine shall follow the 12-month rota until it is deemed to be beyond its safe useful life expectancy.	
Every 4 years	IT equipment and other items which are seldom moved and not subject to high wear and tear shall be tested and inspected

Records of testing and examination shall be kept for reference.

4.15 Emergency Planning

Emergency details for all worksites will be recorded as part of point of work assessments; these details will be communicated to all Employees as part of the pre-work briefing.

In general terms the following information will be recorded on the Site-Specific Risk Assessment:

- location name
- what3words
- designated meeting place
- site location name
- nearest access point
- type of access
- suitable helicopter landing area
- location of nearest accident and emergency hospital with phone number

Where aerial tree work operations are to be conducted, additional emergency planning information will also be recorded to include:

- designated rescuer
- rescue plan

All Employees will have access to vehicle pack emergency response cards containing procedures relating to:

- spills
- fire
- medical emergencies
- contact with utilities

- biosecurity good practice

Emergency response cards also contain a range of useful contact numbers for services such as gas, electricity and the environment.

4.16 Environmental Considerations

Richard Hall Ltd recognises that day-to-day operations can impact both directly and indirectly on the environment. We will actively strive to enhance our local environment, improve the health and well-being of our local community and reduce our carbon footprint, together with the negative impact that we have on our environment, year on year. In addition, as a Company we will work to integrate environmental considerations into our business decisions and adopt greener alternatives wherever possible.

Throughout our operations, we will actively strive to enhance our local environment, improve the health and well-being of our local community and reduce the negative impact that we have on our environment year on year.

4.17 Fatigue

As a Company we acknowledge that the management of fatigue is crucial in ensuring effective health and safety in the workplace. Therefore, we will identify all safety critical working activities and manage fatigue in such circumstances to ensure compliance with legal duties as a minimum.

All individuals understand that the impact of fatigue cannot be underestimated. We know that fatigue will increase risk substantially; especially where our Employees may have to work extended hours or night shifts in safety critical environments.

We will therefore take the following steps to ensure that fatigue is managed effectively in circumstances where it may impact on any employee, or our contractors.

- Consult with our Employees and contractors regarding fatigue, ensuring that they are aware of fatigue and understand the associated risks.
- When planning contract work, we will consult our Employees and contractors regarding shift patterns and working hours, taking account of everyone's health and where appropriate their personal circumstances.
- Ensure that where the physical environment can increase stress, appropriate controls are introduced to manage this effectively, through proactive management and supervision.
- Ensure through robust record keeping that all working hours are recorded, including travel times, overtime, on call working hours and changes that may occur as example through shift swapping or moving between contracts.
- Plan workload and working activities to allow for breaks and rest periods, both within the workplace and between working days. Allowing for rest breaks and ensuring that Employees take such breaks, irrespective of their willingness to work longer hours.
- Ensure that where contracts require night work we discuss with our employee's arrangements for rest, taking account of sleep disturbance and the potential for 'sleep debt', where this work is intermittent or of an 'on call' nature.

All Employees are encouraged to take responsibility for managing their own fatigue levels, especially where this may be influenced by factors outside the workplace. Employees are required to take all provided breaks at work and between work and ensure they advise the Company of any health conditions that may increase fatigue levels.

4.18 Fire

All premises owned, leased, rented, or occupied by the Company for the purposes of business will comply with fire regulations. A fire risk assessment will be carried out on premises such as offices and workshops and, where identified through that process, adequate warning devices, fire extinguishers, fire exits, escape routes and fire drill procedures will be in place.

The fire risk assessment, fire procedures and evacuation plan will be prominently displayed in all premises. As part of a Company vehicle pack, information is provided to Employees on what to do in the event of discovering a fire and the

action to take. Industry-specific guidance is also provided to Employees on how to organise temporary worksites to minimise the risk from fire, e.g. safe working distances applied between fuelling location and machinery starting point.

All works vehicles will be equipped with fire extinguishers and defective equipment will be replaced immediately.

Staff at induction shall be briefed on Company fire procedures, evacuation, firefighting equipment, and muster points.

The Company shall ensure an annual fire evacuation drill is carried out. Checks will be made on all Company fire extinguishers to ensure they remain in good condition and fit for use. Records of inspection for smoke alarms and emergency lighting shall be kept.

Where applicable sufficient Fire Wardens shall be appointed, and they will receive regular refresher training in their duties and responsibilities.

4.19 First Aid and First Aid Kits

Individuals should not put themselves in unnecessary danger to administer first aid.

As part of the onsite pre-work briefing, Employees will be told the location of the first aid kit and emergency information. First aid equipment is in all vehicles, business premises, and by extension on all worksites.

All operational Employees must carry as a minimum an emergency first aid at work qualification.

Any individual using chainsaws or carrying out aerial tree work activities must carry a personal first aid kit containing at least a haemostatic large wound dressing, in accordance with industry good practice.

All accidents requiring the use of first aid equipment must be recorded on a Company adverse event report form. This information allows the Company to ensure materials are restocked and helps to identify patterns or trends and to ensure that legislative requirements are met.

Periodic checks will be made on all Company first aid kits to ensure they remain in good condition and fit for use.

4.20 General Work Equipment

It will be the responsibility of the Managing Director to ensure that the Company:

- provides suitable equipment for the work tasks to be completed;
- ensures that equipment is maintained in an efficient state, in efficient working order and in good repair;
- ensures that all equipment and plant are inspected; and
- ensures that persons who are required to use work equipment receive adequate training, information, instruction and supervision as necessary.

The Managing Director's duties will include an assessment of risks and implementation of preventative measures, guards etc. It will be the responsibility of the users/operators to ensure tools are checked prior to use and are maintained in good working order. Procedures will be implemented to ensure that all plant and tools owned by the Company are tested at recommended intervals.

On occasion, the Company may need to hire in equipment due to either the specialised nature of the work or the quantity of work. The equipment will only be obtained from approved hire companies who supply the appropriate safety documentation and 'hired in equipment agreement'. Where necessary, the Company will carry out training to ensure all Employees and/or subcontractors are suitably trained in the use of the equipment.

4.21 Guidance and Information

All persons, working on behalf of the Company, in whatever capacity, will be expected to abide by industry good practice, approved codes of practice, Health and Safety Executive guidelines and Company procedures.

4.22 Health and Safety Review Procedures and Monitoring

The Company recognises the importance of health and safety inspection and auditing as a means of assessing the effective performance of the health and safety management system. The health and safety policy, procedures and arrangements will be amended in response to changes to legislation, good practice or following an accident or incident investigation. The Managing Director or his representative will carry out a full review of the health and safety management system and health and safety policy annually or more frequently if there have been any significant changes e.g. new work activities, equipment or changes to legislation or arboricultural guidance.

Periodic worksite and workplace safety inspections will be co-ordinated by the Managing Director or his representative, with the findings recorded. Findings will be communicated to all management levels and action points completed within a time-frame specified on the audit report.

The Managing Director will ensure periodic inspections of the Company's offices and workshops are undertaken and recorded.

Subcontractors will be subject to an annual regime of health and safety auditing co-ordinated by the Managing Director or his representative.

4.23 Insurance and Licences

The Company recognises both its moral and legal responsibilities to ensure, regardless of how staff resources are engaged (Employees, subcontractors etc.) or operational activities are conducted, that adequate and appropriate insurance cover is in place.

4.24 Lifting Operations

The Company, in compliance with the Lifting Operations & Lifting Equipment Regulations (LOLER), will ensure that all lifting operations involving lifting equipment are properly planned by a competent person, appropriately supervised and carried out in a safe manner. Only those trained and competent in lifting operations will undertake such tasks.

Lifting Equipment for Lifting Persons

In the case of lifting equipment for lifting persons, items will be individually marked and subject to a thorough, formal examination by a competent person every 6 months. Further to a thorough examination, interim inspections will be completed and recorded.

Other Lifting Equipment

All other lifting equipment will be individually marked and thoroughly examined by a competent person every 12 months.

4.25 Lone Working

Richard Hall Ltd identifies that lone working is not desirable. However, in some circumstances it cannot be reasonably avoided.

As a Company, Richard Hall Ltd has determined that 'lone working' refers to situations where Employees work alone during their duties. They may be physically isolated from colleagues and without access to immediate assistance.

Where Company work activities require Employees to work alone, both the individual and the Company have a duty to assess and reduce the risks which lone working presents.

With the above in mind, we have developed a specific lone-working policy. This policy is designed to alert Employees to the risks presented by lone working, to identify the responsibilities each person has in this situation, and to describe procedures which will minimise the risks.

All Employees will be made aware of this policy during their induction.

4.26 Manual Handling

The Company will assess all manual handling operations within the workplace, taking an ergonomic approach and where possible, changing the nature of any task or provide mechanical aids to reduce or lighten the manual handling of loads. The Company will ensure that adequate risk assessments are carried out to identify hazards associated with manual handling and will ensure that suitable training and supervision are given, and where needed, lifting aids are provided. It will be the responsibility of the Managing Director to ensure that the requirements outlined in the regulations are satisfactorily met.

4.27 Mobile Elevating Work Platforms (MEWP)

MEWPs should be used where reasonably practicable, considering factors such as cost, availability, and site accessibility. All MEWPs, whether owned or hired by the Company, must be 'fit for the purpose' as defined under current regulations.

Only Employees trained in the use and inspection of a machine and who are familiar with the machine and its safety features may use MEWPs. Attention must be paid to the stability of the machine, its limitations and emergency procedures.

All Employees must be correctly attached to the bucket using a personal fall prevention system (work restraint). All Employees must wear appropriate head protection when working at height.

All aerial tree work from a MEWP will be undertaken in accordance with the AA Technical Guide 5: Use of Mobile Elevating Work Platforms in Tree Work. Under no circumstances may two operatives occupy the same cage/bucket when one is using a chainsaw unless separated by a physical barrier.

4.28 Mobile Telephones

Mobile telephones are a necessary and important communication tool within the business. Where a mobile phone is seen as an essential item for individual employee to fulfil their responsibilities, a phone will be supplied. Whilst it is appreciated that personal calls may need to be both made and received, this should not become the norm during hours of work and should generally be limited to emergency situations only.

Driving and Mobile Phones

It is currently illegal to hold and use a mobile phone whilst driving, even if stationary in traffic. It is also illegal to be using a mobile phone on hands free where it affects your care or attention when driving. The general policy therefore is that mobile phones should not be used whilst driving and all those issued with a mobile phone are not obliged to use them whilst driving.

- If a call is received it must only be answered via a hands-free kit.
- The driver should find a safe place to stop the vehicle to make or receive the call.
- Attempt to keep any call as short as possible.
- Calls may be answered only when the driver feels the traffic and road conditions make it safe to do so.
- Calls should not be made whilst driving and if they are, only where traffic and road conditions make it safe to do so.
- Under no circumstances may a call be placed unless via one-touch speed dial or voice activated.
- Under no circumstances may text or multimedia messages be read or written when driving.

4.29 Noise

The Company is committed to continually assessing noise levels within the context of our operational activities. Where needed, noise assessments will be carried out. If the noise levels exceed action levels the first aim will be to reduce noise at source. Where the plant, machinery or process cannot be reasonably silenced or enclosed, the Company will ensure that suitable ear protection is freely available. It is the Company policy to ensure that all new tools and equipment purchased and used by Employees have noise reduction built into the design.

An Asset Register showing noise outputs of chainsaws, hedge trimmers, pole pruners and other noise generating handheld equipment and machinery will be maintained.

All PPE and equipment will be maintained to ensure that noise levels are kept as low as possible. All new or replacement equipment purchased will be selected for low noise outputs so as to further reduce the risk.

Annual 'in house' assessments/screening of all operatives will be implemented.

4.30 Pandemic

In the event of a Pandemic, the Company will regularly review measures as government advice is provided and changes alongside regularly consulting with Employees to ensure an appropriate response to the risk that staff can comply with.

4.31 Personal Hygiene

The nature of the Company's operation requires Employees to work in potentially dirty and dusty conditions on short-duration worksites which expose them to substances potentially harmful to health.

Where normal hand-washing facilities are not available, alternative facilities will be made available such as waterless skin cleanser, hand wipes or similar.

The nearest available welfare facilities shall be clearly marked on each job sheet or SSRA.

4.32 Personal Protective Equipment (PPE)

For the purposes of our policy, PPE shall mean any device or appliance designed to be worn or held by an individual for protection against one or more health and safety hazards.

The Company recognises that PPE should only be used when risks cannot be avoided or sufficiently reduced by other preventive measures or through work re-organisation.

The Employer will ensure that for Employees there is sufficient supply of PPE when required and will ensure individuals are suitably trained in the use and correct storage of PPE. In addition, the Company shall ensure that the PPE supplied is suitable for the individual Employee.

PPE issued to any Employee will be appropriately recorded, detailing what has been provided along with when it was issued. All PPE issued is to be stored as per the manufacturer's specification.

It shall be the duty of each Employee not to misuse or interfere with any health and safety equipment, including PPE, supplied for their safety.

Subcontractors shall be expected to supply their own PPE and be able to demonstrate that they are suitably trained in its use.

Self-Purchasing Policy

In all cases where self-purchase or the supply of PPE takes place including that of subcontractors, the following guidance must be adhered to:

- a) Only equipment approved by the Employer may be purchased for use on/at our worksites in accordance with the purchasing and use policy below.
- b) Operators are responsible for ensuring that they supply, where relevant, user instructions and maintenance equipment required.
- c) In all cases operators have primary responsibility for ensuring their equipment is maintained and safe for use. The Employer reserves the right to quarantine or remove from a worksite any equipment deemed to compromise safety standards.
- d) For Employees, all equipment must be recorded with Head Office as part of PPE records prior to being used on our worksites.

Purchasing Policy

PPE products are to be purchased only if they are supplied with appropriate evidence of conformity, are fit for purpose, and are manufactured to, where applicable, BS EN/UKCA standards.

Where subcontractors supply PPE, it is expected that only equipment with appropriate evidence of conformity is supplied, which is used in accordance with both the manufacturer's guidance e.g. user instructions, and current industry good practice.

4.33 Personnel Records

Planning can help our Company to remain competitive and provide a good service to our customers. Planning will depend on having accurate, up-to-date information. Personnel records are particularly important when it comes to getting the best out of our Employees. Effective recruitment, training and staff development play a key part in achieving organisational goals; managing aspirations, competency and conduct.

Maintaining up-to-date records, compliant with data protection legislation, can help us as a Company:

- make decisions based on fact rather than guesswork.
- know what staff resources are available to meet service requirements.
- more accurately assess levels of performance and productivity; and
- know what is happening with absence levels, employee turnover, sickness, accidents, lateness, etc., and take appropriate and timely action.

4.34 Protection of Young Persons

The Company shall ensure that young persons (under 18 years of age) employed by us are protected at work from any risks to their health and safety which are a consequence of their lack of experience, or the fact that young persons have not yet fully matured and may not comprehend any hazards in the workplace.

4.35 Risk Assessments, Method Statements and Standard Operating Procedures

All work activities shall undergo a suitable and sufficient risk assessment.

Upon the establishment of the risk, preventative measures are identified which are then introduced, maintained and periodically reviewed to ensure safe systems of work. It shall be the duty of the Managing Director to ensure risk assessments are carried out and reviewed periodically.

Company common-factor risk assessments are reviewed:

1. annually.
2. following any change to work equipment.
3. following change or modification to a system of work; and
4. in light of industry or sector developments or changes and updates in sector specific information or guidance.

Standard Operating Procedures

The Company has identified that Working Procedures (WPs), Standard Operating Procedures (SOPs), and Work Instructions (WIs) etc. are documents that are variations of the same theme which is to accurately document how as a Company we consider our work should be undertaken and completed by our Employees, particularly regarding hazardous work processes.

It has been determined that SOPs are to be designed to standardise working practice to ensure that no-one gets hurt or injured. Simply put, they are the detailed instructions given to employees to enable them to work safely.

As an Employer, we understand that we are required by law to implement safe systems of work, therefore when SOPs are developed they are to be rigorously implemented.

Method Statements

Method Statements shall be prepared specifically for work on larger or complex projects, or at a client's request. It shall form the main health and safety documentation to be used during the operational part of the project; to define

and record the safe system of work.

Information to be contained with a method statement will include:

- a sequence of procedures necessary for the safe carrying out of a task;
- information relating to factors that will impact upon those procedures, such as but not limited to access, egress, meeting points, safety and security, public interface and noise, provision for emergencies and environmental considerations
- the control measures that are to be implemented to ensure the safety of anyone who is affected by the task or process.

4.36 Services

Overhead Lines

Before any work commences sites must be checked for all overhead lines.

Where overhead lines have been identified they should be recorded as part of the risk assessment. All Employees must be made aware of their location along with the control measures to avoid damage to the lines and danger to the Employees onsite.

Overhead Power Lines (OHPL)

Where work is necessary in proximity to OHPLs, the method of work will be agreed with the Distribution Network Operator (DNO) and if required work permits received before any work commences.

Employees must be aware that safe working distances from OHPLs may vary depending upon the nature of work being undertaken and specific industry good practice. If Employees are in any doubt at all whether work can commence in proximity to OHPLs, they must stop work and make immediate contact with their supervisor.

Please note that no tree felling operations are to take place within two (2) times tree length of an OHPL, without first consulting with a senior Company representative.

Where any part of a tree comes within 9m of any live equipment up to and including 66kV typically found on wooden poles, and 15m of any live equipment greater than 66kV typically found on metal pylons, no work is to be carried out without first consulting with a senior Company representative.

Under no circumstances should anyone attempt to perform an aerial rescue of a climber who is in direct or indirect contact with live electrical apparatus.

Underground Services

Manholes, chambers and underground pipes and cables can be damaged during operations, e.g. by felling trees, MEWP stabilisers, trenching. The site must be thoroughly checked for any underground services and adequate control measures put in place.

Employees must inform Richard Hall (Managing Director) or Jon Challinor (Contracts Manager) if they suspect underground services are present and may be damaged by the proposed operations. In the case of cables and pipelines it may be necessary to use a cable avoidance tool (CAT) and signal generator (genny) to accurately locate these services.

Only those trained in the use of CAT and genny are permitted to operate them.

4.37 Smoking

The Company operates a no smoking policy in all offices, workshops and vehicles. Smokers are required by law to refrain from smoking wherever non-smokers may be affected and within any enclosed spaces.

Smoking is strictly prohibited in all vehicles and appropriate signage will be clearly displayed within all vehicles and at the entrances to and within Company offices and workshops.

4.38 Stress

As a Company we recognise that, whilst a degree of pressure can be a positive force at work, excessive pressure can have a negative effect on health and performance at work.

We are committed to promoting good health at work and to provide suitable support mechanisms for Employees suffering from the effects of stress.

Senior management will identify stressful jobs and situations, through risk assessment, with the objective of reducing harm from stress, as far as is reasonably practicable.

The Company will make sure, so far as is reasonably practicable, that excessive pressure is eliminated from the work environment, and that the necessary risk assessments are completed and acted upon in the case of workplace stressors.

To assist in this process, we will:

- provide suitable support mechanisms for individuals suffering from the effects of stress
- encourage a working environment where individuals who feel they are suffering from the effects of stress can approach their managers in confidence, in order that necessary support mechanisms can be put in place
- encourage a culture where stress is not seen as a sign of weakness or incompetence
- ensure adequate rehabilitation of individuals returning to work after periods of absence due to stress
- offer suitable training where necessary to enable key individuals to recognise symptoms of stress, the effects of stress at work, effective communication, handling difficult situations, time management and Employer/Employee relations

4.39 Vehicles and Driving

Drivers are responsible for completing pre-use checks and the safe use of any vehicle they are driving, including the safety of loads carried or trailed. This includes their own vehicles, Company vehicles and hired vehicles.

Company Vehicles

Only authorised personnel may drive Company vehicles and they must have an appropriate licence for the category and class of vehicle and combination under their control. A copy of a drivers licence must be held at Head Office before they may drive a Company vehicle.

If any changes to the licence occur, then a new copy of the licence must be submitted to Head Office as soon as possible.

The Managing Director or his nominated representative must be informed as soon as possible of any driving offences resulting in penalty points being added to your licence.

Loading Vehicles

The driver is responsible for the safety of the load they are carrying.

All drivers must ensure they are aware of the vehicles 'maximum authorised mass' (MAM = gross vehicle weight) and ensure that it is not exceeded at any time. Attention must be paid to the combination of vehicle and trailer weights when both or either are loaded.

All loads must be secured and at no time cause a nuisance to other road users or pedestrians. Loose loads liable to shed dust must be sheeted or netted down. Load (ratchet) straps and/or appropriately rated rope may be used to secure loads. Loads must be secured so that they will be restrained in the event of sudden braking.

Private Vehicles

Where private vehicles are used for Company business or for travelling to and from work adequate insurance cover must be in place, which covers business use if appropriate. Where vehicles are used for business purposes a copy of the insurance certificate will be required. The vehicle must be in a roadworthy condition and, where appropriate, have a valid MOT certificate and vehicle excise duty.

4.40 Vibration

To control the risks associated with noise and vibration in the workplace and to comply with the associated regulations the following arrangements will be implemented.

An asset register showing the vibration outputs of chainsaws, hedge trimmers, pole pruners and other vibrating hand-held equipment and machinery will be maintained.

Employees will be provided with information about vibration risks. A clear indication will be provided to operatives of the maximum daily 'trigger time' for each piece of machinery.

Staff rotation will be implemented if maximum trigger times are reached in order these will not be exceeded PPE and equipment will be maintained to ensure that vibration levels are kept as low as possible.

All new or replacement equipment purchased will be selected for low vibration outputs to further reduce the risk.

Annual 'in house' assessments/screening of all operatives will be implemented.

4.41 Welfare

Offices and workshops shall have suitable welfare facilities including toilets, wash facilities and an area in which to take breaks and lunch.

For short duration work on site, 'local arrangements' shall be made, and these arrangements shall be recorded and communicated as part of the point of work assessments.

For longer duration sites, facilities shall be provided on site or arrangements shall be made to share facilities of the main contractor if applicable.

4.42 Working at Height

Careful and detailed consideration will be given to the need to work at height. Where reasonably practicable work at height should be avoided, and where it cannot be avoided justifiable evidence should be available to support that decision.

The Employer will ensure that our general management approach to work at height is based upon objective decisions which are documented, and that specific arrangements (i.e. risk assessments for work at height) are in place for assessing and managing the risks on every occasion, across the broad range of worksites likely to be encountered.

The responsible person will ensure all work is: a) properly planned; b) appropriately supervised; and c) carried out in a safe manner.

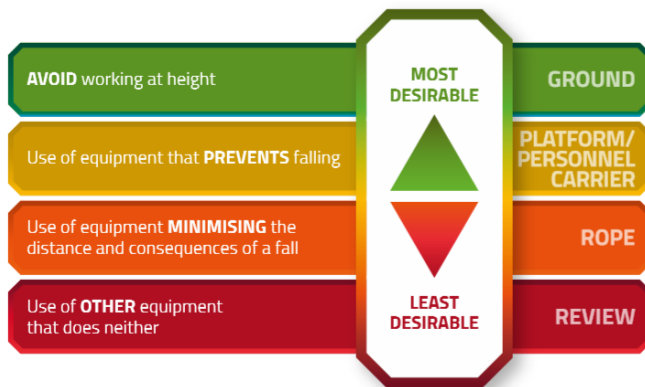
Planning will include the correct selection and use of equipment; the undertaking and effective communication of thorough and detailed risk assessments; and appropriate emergency procedures, including rescue provision.

Planning of any work at height operation will also include avoiding weather conditions that may jeopardise the health and safety of operatives.

It will be ensured that there are sufficient and robust systems in place to ensure that any changes are communicated to and supported by the responsible/competent person before work starts, or a suitable system of delegation of responsibility is in place.

It will be ensured that all tasks, from planning to implementation, will be undertaken by appropriately competent persons or others supervised by such persons.

We seek to work to a framework for the management of risks associated with working at height. The fundamental principles or risk hierarchy are:



When the most appropriate equipment, techniques or methods of working are being selected, the basic principles outlined within the 'Tree work at height – risk hierarchy' diagram above will be implemented.

When working through the hierarchy, the competent and/or responsible person will select any work method and/or equipment by considering the risks associated with its installation, use and/or removal once work is finished, including any rescue requirements for such a method and/or equipment. It will also be ensured that for any work method chosen collective protection measures will have priority over personal measures.

Whilst working through the hierarchy, the responsible and/or competent person will determine the risks and reasonably practicable control measures associated with each level and justify why a work technique or method that sits higher in the hierarchy has not been selected.

Decisions on working at height methods will be based on the preliminary worksite assessment. A process undertaken by the responsible and/or competent person.

Personal Fall Protection Systems in Tree Work

When a proficient operator is using a personal fall protection system for tree climbing, it is expected that there will be a backup system to prevent them falling a distance that is likely to cause injury if the primary system (including the main line, components, or anchor) were to fail.

The backup should be attached to an independent anchor where possible. If there is no suitable independent anchor, it should be installed over a shared anchor.

A backup, in addition to the climber's primary system, may include:

- a. Two separate primary systems, i.e. two climbing systems, MRT/SRT or a combination of both. This may be referred to as dual line working.
- b. Using both ends of the same climbing rope to create two systems from one rope.
- c. An adjustable lanyard(s). Whilst potentially restrictive in length, it may be used in scenarios such as working on a pole.

4.43 Work Safe

Working safely requires the establishment of safe systems of work, delivered by a competent workforce demonstrating the correct safety behaviours.

No Employee of Richard Hall Ltd, or anyone working on behalf of Richard Hall Ltd, is not expected to carry out any task where they feel that the risk to themselves or to others is unacceptable.

Under our Worksafe, or Refusal to Work Policy, each member of staff has the absolute right to refuse to carry out work if they feel it is not safe to do so.

Refusal to work on the grounds of Health and Safety is free from any disciplinary action and will not affect, in any way, their prospects within the company.

All refusals to work will be responded to positively & promptly and the employee raising the Worksafe procedure will be informed of decisions throughout the process.

All managers and staff are also encouraged to report any unsafe acts or conditions, which they have witnessed.

4.44 Workplace Safety

The Company will ensure that our workplace meets the health, safety and welfare needs of all our Employees, visitors, contractors, including, wherever practicable, people with disabilities. The Managing Director will ensure that the working environment, whether at the Company premises or elsewhere, is adequate in respect of lighting, heating, ventilation, eating and drinking facilities, hygiene/toilet facilities and general cleanliness.

4.45 Work Equipment

The term 'equipment' shall cover all tools, plant, vehicles and machinery used during Company business. Equipment shall only be used for the purpose it was designed for in accordance with the manufacturer's instructions. All guards must remain in place and be functioning correctly. No modifications shall be carried out unless under the instructions of the manufacturer. Essential information and warning signs shall be in place always.

Equipment shall be checked, inspected, maintained and serviced in accordance with the manufacturer's instructions and the provisions of PUWER and LOLER. A register of all equipment kept shall be maintained showing details of history, servicing and repair. All equipment shall be clearly marked to be identifiable.

Daily checks shall be carried out by Employees prior to using the equipment. Periodic maintenance checks shall be carried out and recorded.

It is the responsibility of the employee using any equipment to report any defects in the equipment as soon as they become apparent. Arrangements shall be put in place by Richard Hall Ltd to repair or withdraw the equipment. Withdrawn equipment shall be clearly marked as such and shall not be used until repaired, or the equipment will be disposed of.

Rules in relation to plant and equipment:

- Employees shall not operate any machine unless they have been trained and authorised to do so.
- Operators must not interfere with or remove guarding on any piece of equipment.
- Any faults, damage, defects or malfunctions must be reported to the Managing Director or his nominated representative as soon as they are discovered.
- Operators must not attempt any maintenance on any machine unless they are trained and authorised to do so.
- Cleaning or maintenance must not be undertaken unless the machine has been shut down and where applicable the power isolated. On self-powered equipment the key must be removed.
- Machinery must not be left unattended whilst it is in motion.