



# Health & Safety Policy and Safety Management System

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Issue: **January 2023**    Review Date: **January 2024**    Prep: MU (SAA)    Approved: KN (OSSL)

# Contents

<i>Item</i>	<i>Description</i>	<i>Page</i>
<b>1.</b>	<b>Introduction</b>	<b>4</b>
1.1	Arrangements for reviewing and updating Policy & SMS	4
1.2	Revisions to system	5
<b>2</b>	<b>Safety Policy Statement</b>	<b>6</b>
<b>3</b>	<b>Organisation Chart</b>	<b>7</b>
<b>4</b>	<b>General Responsibilities for Managing Health &amp; Safety</b>	<b>8</b>
4.1	Directors & Management	8
4.2	Manager(s)	8
4.3	Site Supervisors and Yard Forman	9
4.4	General Duties of Employees	9
4.5	Independent Health & Safety Consultants	9
<b>5</b>	<b>Training &amp; Competence</b>	<b>10</b>
5.1	Training & Competence	10
5.2	Induction Training	11
5.3	Modular Training (Toolbox Talks)	11
<b>6</b>	<b>Communication of Information</b>	<b>11</b>
6.1	Essential Information & Feedback	11
6.2	Notice Boards	11
6.3	Formal Communication	11
6.4	External Communication	12
6.5	Effective Supervision & Control	12
6.6	Consultation with Employees	13
6.7	Liaison with Fellow Employers	13
6.8	Control & Co-ordination of Contractors	13
<b>7.</b>	<b>Planning &amp; Implementation</b>	<b>15</b>
7.1	Overview of the Main Flow Process (Management programme)	15
7.2	Performance Standards	16
7.3	Risk Assessment	16
	7.3.1 Generic Risk Assessment	16
	7.3.2 Specific Risk Assessment	18
7.4	Method Statements & Scaffold Plans	19
7.5	Preventing Falls	19
7.6	Work at Height	20
7.7	Work Equipment	21
	7.7.1 Scaffolding Materials	21
	7.7.1.1 System Scaffolding	22
	7.7.2 Mobile Plant & Vehicles	22

	7.7.2.1 Forklift Trucks	22
	7.7.2.2 Mobile Elevated Work Platforms (MEWP's)	23
	7.7.3 Electrical Equipment	23
	7.7.4 Machinery Guarding	24
	7.7.5 Lifting Operations & Lifting Equipment	24
7.8	Occupational Health	24
	7.8.1 Manual Handling	24
	7.8.2 Hazardous Substances	25
	7.8.3 Asbestos	26
	7.8.4 Noise	26
	7.8.5 Vibration	27
	7.8.6 Health Surveillance & Screening	27
	7.8.7 Stress	27
	7.8.8 Leptospirosis' (Weil's Disease)	27
	7.8.9 Coronavirus: Covid-19	28
7.9	Overhead Powerlines & Underground Services	30
7.10	Scaffold Inspection, Commissioning & Handover	30
7.11	Masonry Anchor Testing	30
7.12	Protection of the Public & Others	31
7.13	Personal Protective Equipment	31
7.14	Scaffold Design	32
7.15	First Aid & Emergency Arrangements	32
7.16	Welfare Facilities	33
7.17	Housekeeping	33
7.18	Smoking at Work	33
7.19	Substance Abuse at Work	33
7.20	Young Persons at Work	34
7.21	Dealing with the Enforcing Authorities	34
7.22	Hot Work (Welding, Burning, Cutting or Grinding)	35
7.23	Work on or near the Railway	35
7.24	Confined Spaces	35
7.25	Construction (Design & Management) Regulations 2015	35
7.26	Mobile Phones	36
7.27	Office Safety	36
	7.27.1 DSE User & Operator	36
	7.27.2 Eye Tests & Corrective Devices	37
7.28	Yard Safety	37
7.29	Records Management	37
7.30	Variation Management	37
<b>8.</b>	<b>Measuring Performance</b>	<b>38</b>
8.1	Reactive Monitoring	38



	8.1.1 Accident Reporting & Investigation	38
	8.1.2 Near Miss & Hazard Reporting	41
	8.1.3 Accident Records, Classification & Statistics	41
8.2	Proactive Monitoring	42
	8.2.1 Internal Safety Monitoring	42
	8.2.2 Independent Monitoring	43
8.3	Key Performance Indicators	43
	8.3.1 KPI Targets & Objectives	43
<b>9.</b>	<b>Reviewing Performance</b>	<b>43</b>
9.1	Health and Safety Review Meetings	43
<b>10.</b>	<b>Other Policy Statements</b>	<b>45</b>
10.1	Environmental Policy Statement	45
10.2	Equal Opportunities and Diversity Policy Statement	46
10.3	Slavery and Human Trafficking Policy Statement	47
10.4	Anti-Bribery and Corruption Policy Statement	48
10.5	General Data Protection Regulation (GDPR) Policy Statement	52
<b>Appendices</b>		
A	List of Relevant Health & Safety Regulations	53
B	Scaffold Design Matrix	54

## 1. Introduction

This Health, Safety & Policy and Management System have been prepared to comply with the statutory requirements of Section 2(3) of the Health and Safety at Work etc. Act 1974. Contained within this document are Oxford Spires Scaffolding Ltd's policy, organisation and arrangements for occupational health, safety and welfare for all our business activities.

At Oxford Spires Scaffolding Ltd health, safety and welfare issues rank equally with other business objectives and achieving good health, safety and welfare performance is recognised as being consistent with overall successful business performance. We also recognise that failure to integrate health, safety and welfare into our operations will result in harm to people and associated loss. Therefore, we take an integrated approach where managing health and safety forms part of the overall business strategy.

Policy statements included in this document are as follows:

- Health and Safety Policy Statement
- Environmental Policy Statement
- Equal Opportunities and Diversity Policy Statement
- Slavery and Human Trafficking Policy Statement
- Anti-Bribery and Corruption Policy Statement
- General Data Protection Regulation (GDPR) Policy Statement

### 1.1 Arrangements for reviewing and updating Policy & SMS

The Director responsible for Health and Safety is Karl Naylor, with the assistance of the Health & Safety Consultants are responsible for keeping the Company up to date with



developments in occupational health and safety: new and changing health and safety legislation, case law, and best practice.

This Policy and associated procedures shall be revised in accordance with any significant changes identified above and at least reviewed every 12 months, to ensure that remains relevant to the business operations and up to date.

## 1.2 Revisions to System

### Issue 12 – January 2019

- Complete re-write and update of last policy.

### Issue 13 – January 2020

- Update to SG7:19 Clause 7.3
- Add reference to TG4:19 Clause 7.11
- Add reference to fire risk assessment Clause 7.15
- Review and update list of Regulations Appendix A

### Issue 14 – January 2021

- Update to TG20:21 and SG4:21 Various Clauses
- Update organisation Chart Clause 3
- Update training examples Clause 5
- Add Mobile Plant & Vehicles Clause 7.7.2
- Add Stress Clause 7.8.7
- Add Leptospirosis (Weil's Disease) Clause 7.8.8
- Add Coronavirus: Covid-19 Clause 7.8.9
- Change job titles Clause 8.2.1
- Change areas of Company operations Clause 10.1
- Review and update Regulations Appendix A

### Issue 15 – January 2022

- Complete policy review Various Clauses
- Updates to TG20:21 Various
- Review and update Regulations Appendix A
- Revise scaffold design matrix wording Appendix B

### Issue 16 – January 2023

- Complete policy review Various Clauses
- Updates to SG4:22 Various
- Add reference to SG6:22 Manual Handling Clause 7.8.1
- Update to Coronavirus Covid-19 Clause 7.8.9
- Update to Personal Protective Equipment (New Reg) Clause 7.13
- Review and update Regulations Appendix A
- Revise scaffold design matrix wording Appendix B

## 2. Safety Policy Statement

It is the policy of Oxford Spires Scaffolding Ltd to manage its activities without causing injury, ill health or other unnecessary and unacceptable risks, to the health, safety and welfare of its employees, customers, members of the public and others who may be affected by its activities; so far as reasonably practicable. It also recognises its responsibility for other persons when they are on our premises.

The Director of Oxford Spires Scaffolding Ltd are committed to ensuring so far as reasonably practicable, the health and safety at work of all its employees. This commitment extends to the provision of the human and material resources necessary for the proper discharge of its own statutory duties and for the proper discharge of the duties and responsibilities of its managers, foremen and workforce in connection with health and safety at work. As well as complying with the Statutory requirements of the Health and Safety at Work etc Act 1974 and other Statutory Instruments, the Directors aim is to establish best practice and to use best, established methods of management within our operations as we seek to further develop this through a process of continual improvement.

Each employee will be given such information, instruction and training necessary to enable the safe performance of work activities.

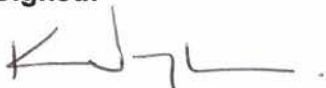
Competent people will be appointed to assist us in meeting our statutory duties including, where appropriate specialists from outside the organisation.

The Director of Oxford Spires Scaffolding Ltd expects that all its employees will act in a responsible manner and fully co-operate in the implementation of the Company Safety Policy and in ensuring that safe working is an integral part of each and every task. Each individual has a legal obligation to take reasonable care for his or her own health and safety, and for the safety of other people who may be affected by his or her acts or omissions.

The Director of the Company undertake to ensure that suitable and sufficient resources - in terms of time, finance and personnel are made available to carry this Policy to full effect

This policy will be regularly monitored, reviewed in the light of legislative or organisational changes and on an annual basis and updated as necessary.

**Signed:**

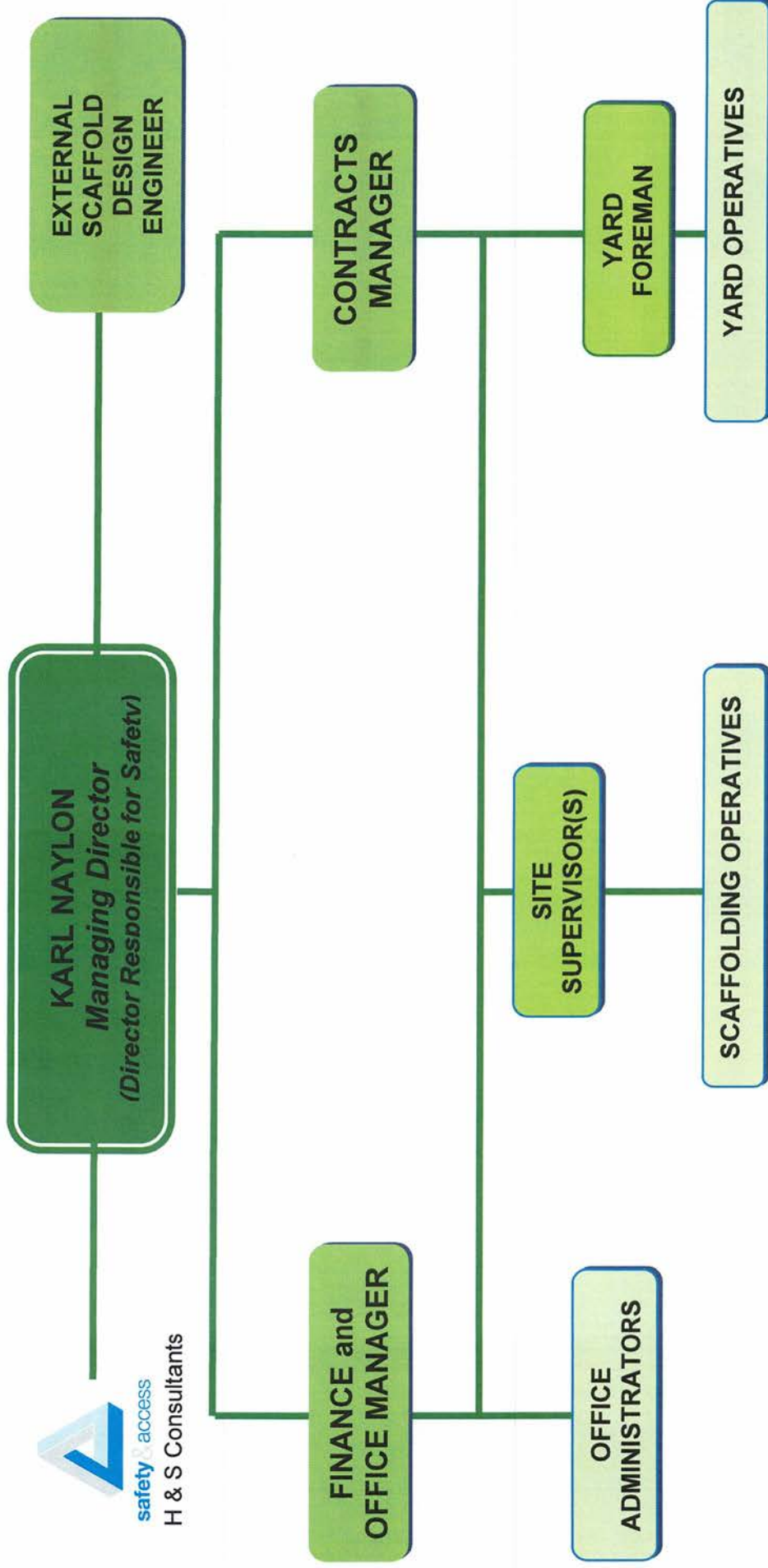


**Karl Naylor**  
**Director responsible for Health and Safety**

**Dated: 31<sup>st</sup> January 2023**

### 3. Organisation Chart

As stated in the Safety Policy Statement the management of occupational health and safety at Oxford Spires Scaffolding Ltd is a line-management responsibility, as the line management, from Director – through to first line Foremen are charged with controlling the business operations. Health and safety is an integral part of all our operations, therefore each member of the line-management is charged with managing health and safety within their sphere of operation. The following organisation chart defines the hierarchy within the company:



safety & access  
H & S Consultants



## 4 General Responsibilities for Managing Health & Safety

This section covers the basic general responsibilities for managing occupational Health and Safety at Oxford Spires Scaffolding Ltd. Other documents also contain specific responsibilities for Health and Safety, these include: -

- Work Instructions
- Job Descriptions
- Company procedures
- Risk Assessments & Method Statements

### 4.1 Directors and Management

The Director responsible for safety has ultimate responsibility for health, safety and welfare at Oxford Spires Scaffolding Ltd.

The Director with this prime responsibility is Karl Naylor. He is responsible for bringing the policy to the attention of all management, employees and sub-contractors and ensuring compliance through monitoring arrangements. He is also responsible for managing all Health and Safety communications to outside agencies (e.g.: HSE, NASC, Clients etc) and responding to any complaints.

This Policy is a live document, which needs to be reviewed from time to time to ensure that it remains current with the Company's activities and changing legislation. It is the responsibility of Karl Naylor, with the assistance of the Health and Safety Consultants, to assess the implications of new legislation and best practice, to produce investigation/audit reports, monitoring systems etc, for the Company and to amend the Policy as necessary.

Throughout the organisation, the visible and active leadership of the Director, Manager and Chargehand is necessary to develop and maintain a culture supportive of health and safety management.

The Manager and Chargehand have direct control and responsibility for health and safety management within their sphere of operation, for securing compliance with this Safety Policy and Management System.

### 4.2 Manager(s)

At Manager Level, there is accountability to the Director for the installation, enforcement and practical implementation of the company safety policy, the health and safety requirements of relevant regulations and codes of practice.

Integral with, and as part of, their general managerial responsibilities, is the responsibility to set and monitor safety standards, raise and control safety performance, influence safety attitudes and awareness. To communicate safety by meetings, to report record and investigate accidents and initiate corrective action, and to assess the training needs for all their subordinates.

#### 4.3 **Site Supervisor(s) and Yard Foreman**

At Site Supervisor and Yard Foreman level, there is accountability to the Directors and Managers to ensure, by direct supervision, that all aspects of safe working are practised at all times. Their supervisory responsibilities include the practical implementation of safety standards, control of material and work quality; monitoring and correcting work systems.

Site Supervisors and the Yard Foreman shall ensure that before allocating any work to be undertaken that due consideration has been given to; the risk of injury or loss involved. Also, to the necessary competence of the employees involved, as required by this Policy and HSEMS. They must co-operate and assist the Senior Management in securing compliance with this Policy and Management System.

#### 4.4 **General Duties of Employees**

All members of the workforce carry individual responsibilities and these are outlined in the Health and Safety at Work etc. Act 1974, as follows: -

- To take reasonable care of themselves and others who may be affected by their acts or omissions.
- To co-operate with the employer so far as is necessary to enable the employer to comply with his statutory duties.
- Not to intentionally or recklessly interfere with or misuse anything provided in the interest of health, safety or welfare.
- To know and to obey safety rules
- To report all accidents and incidents.
- To provide high quality workmanship

The Company requires the full support of all employees and sub-contractors to have effective accident prevention.

#### 4.5 **Independent Health & Safety Consultants**

Oxford Spires Scaffolding Ltd retains the services of Safety and Access Ltd as an independent health and safety consultant to provide professional assistance and guidance and to assist the Company in compliance with Regulation 7 of the Management of Health and Safety at Work Regulations 1999, regarding competent advisors.

The Consultants main responsibilities are to: -

- Advise the Director for Safety and Management of any new safety legislation or changes in existing legislation.
- Provide an interpretation of safety legislation so that the management fully understands the actions required in order complying with legislation.



- Assist with initial implementation of the changes in safety legislation.
- Suggest suitable training for all levels of employees, posters, slides, films etc to provide awareness of accident prevention and hazards to health.
- Recommend to Directors & Management ways to improve working conditions.
- Investigate notifiable accidents or dangerous occurrences and submit to the company a written confidential report.
- Carry out pre-arranged site audit visits.

## 5 Training & Competence

Oxford Spires Scaffolding Ltd recognises its general duty to employees under section 2(2) c of the Health and Safety at Work etc. Act 1974, to provide all necessary information, instruction, training and supervision. To this end the company continuously assesses the competency level of all employees and where applicable sub-contractors.

Periodically, we will carry out an organisational training needs analysis (TNA) of all activities to establish minimum competency levels and identify any training requirements. Following a TNA, training programmes will be developed to fulfil those minimum competency levels. TNA is a form of risk assessment, although the normal risk assessment process shall identify additional training requirements.

Training for competence at Oxford Spires Scaffolding Ltd is divided into four main categories:

1. **Induction training** for all new starters
2. **Skills training** for management and trade competence (eg: CISRS training)
3. **Health and safety training** (e.g. IOSH Managing Safety or SMSTS for management, CISRS Scaffold Supervisor or SSSTS for Supervisors and CISRS CPD training for CISRS Scaffolders.
4. **Modular training** in the form of toolbox talks and task specific briefings (eg: RAMS).

### 5.1 Training Records

Training records are maintained in the personnel files with copies of certification.

Training and skills matrix (including CISRS grade, card number & expiry date) will be developed and maintained as a quick reference guide when allocating duties to individuals and as a means of monitoring validation periods, to ensure refreshers are undertaken.



## 5.2 Induction Training

Every new employee will receive induction training, before commencing work, which includes health and safety, to ensure that they are not exposed to unfamiliar hazards. An induction-training package will be maintained to ensure that all essential information is covered.

The induction is recognised as an opportunity to convey the management beliefs and company values for health and safety management and to help influence the attitudes of all new starters.

A record of induction will be kept, signed by the inductees as an acknowledgement that they have understood the content.

## 5.3 Modular Training (Tool Box Talks)

Modular training in the form of toolbox talks helps increase and maintains general levels of health and safety awareness.

The Director and Management will establish frequency of toolbox talks, as necessary (e.g. weekly, fortnightly or monthly). However, every operative as a minimum must receive at least one toolbox talk per calendar month, covering a specific topic.

Additional general toolbox talks are a useful medium for general day to day communication of information such as sharing accident learning or introducing best practice.

A record of attendance must be kept, with the signature of each attendee.

# 6 Communication of Information

## 6.1 Essential Information & Feedback

The 'toolbox talk' medium can be used to help disseminate essential health and safety information throughout the organisation.

It is important to solicit information from the workforce and receive feedback on health and safety issues. A few moments should be taken at the end of each toolbox talk giving the opportunity to raise and discuss issues.

## 6.2 Notice Boards

A notice board(s) for posting health and safety information must be in common areas of the office accommodation and welfare facilities i.e. main office etc. This information shall include a copy of the statutory HSE Health and Safety Law poster.

## 6.3 Formal Communications

To ensure the effective communication of important information Oxford Spires Scaffolding Ltd uses the following formal systems: -

- Work Instructions
- Memorandums & General Notices

- Guidance Notes
- Safety Bulletins

Safety Bulletins are a system for communicating up-to-date health and safety information. Important issues, such as accident / incident learning to be shared will be compiled and issued to all employees, as necessary. Copies of such written information should also be posted on the notice boards.

Certain formal communications may require the recipient to sign and return an acknowledgement slip accepting that they have received, read and understood the communication e.g. method statements, risk assessments etc...

#### 6.4 External Communication

Karl Naylor is the designated first point of contact for all health and safety enquiries from any external organisations (eg: clients, HSE, etc); he is also responsible for co-ordination and co-operation of all the Companies works externally with clients, other contractors, local authorities and other interested parties.

Visitors, Contractors and delivery drivers will follow the health and safety induction procedure before access to premises or carrying out of any work on the premises.

#### 6.5 Effective Supervision & Control

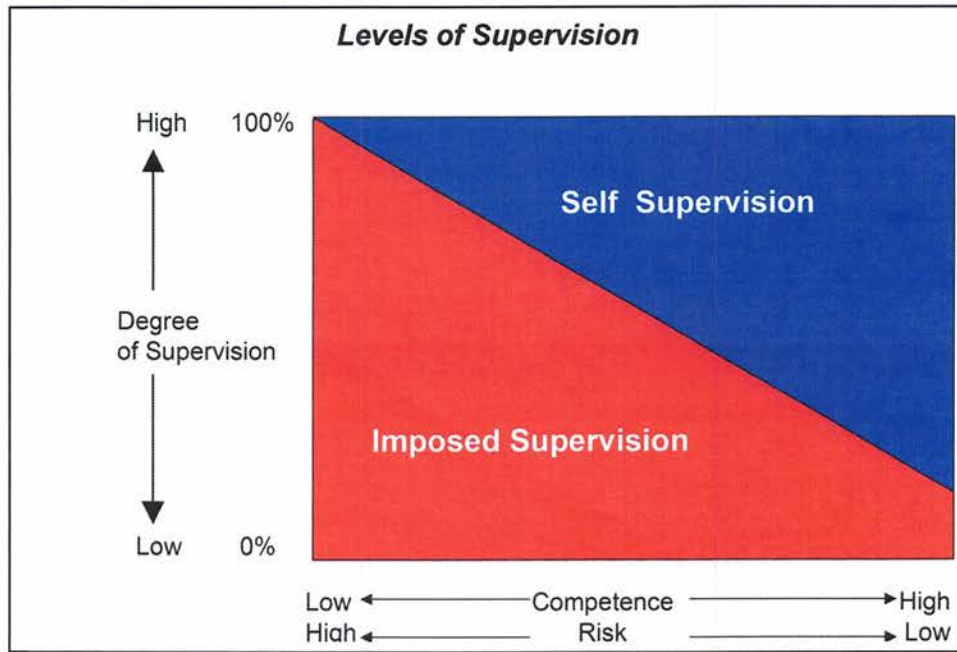
At Oxford Spires Scaffolding Ltd we have established four general principles for effective supervision to help ensure control of our core operations, due to the mainly peripatetic nature of the work, and compliance with the established performance standards - for all elements of the business – not just health and safety.

The four general principles for effective Supervision are to: -

1. Ensure every job is surveyed and a suitable and sufficient **risk assessment** carried out (see section 5.3 Risk Assessment).
2. Ensure the correct **competence** levels of those allocated duties, in relation to the task(s) to be undertaken and the work equipment to be used.
3. Ensure the effective **communication** of the required performance standards and essential information. E.g. Control measures
4. Establish and implement the suitable levels of imposed and self-supervision depending upon the degree of risk and the competence levels of the operatives involved. Always ensure a minimum level of **imposed supervision**. This also includes the commissioning of work and handover by a competent person.

The following illustration (next page) is a guide to establishing the suitable levels of imposed supervision:





Remember that new starters and young or inexperienced or unqualified workers require a higher degree of supervision until their competence is proven.

A Manager may delegate the performance of a supervisory duty to a subordinate, but they must ensure that they are deemed competent to undertake the particular task e.g. a requesting an Advanced Scaffolder to commission a job and complete the handover certificate.

The Director of Oxford Spires Scaffolding Ltd will ensure that all line-management with supervisory responsibility for others receive the appropriate management training.

### 6.6 Consultation with Employees

Legislation requires employers to hold consultation with employees and to recognise the rights of employee and union safety representatives and safety committees. Oxford Spires Scaffolding Ltd will comply with the relevant legislation as a minimum standard, this is done via feedback from Toolbox Talks.

### 6.7 Liaison with Fellow Employers

Oxford Spires Scaffolding Ltd recognises its duty under the Management of Health and Safety at Work Regulations 1999, to communicate with fellow employers to ensure information about hazards and control measures is shared. This will enable suitable arrangements to be made, normally by pre-start meetings and daily site briefings with other site contractors at the start of the day.

### 6.8 Control & Co-ordination of Contractors

It is the general policy of Oxford Spires Scaffolding Ltd where practicable not to employ sub-contractors. If at any time Sub Contractors work for the company they will, for Health, Safety and Welfare purposes are treated as



being employees. However, when specialist sub-contractors are employed the control of Contractors activities must be strictly covered by the terms of their contract.

A formal vetting process for health and safety will be carried out for the assessment of Suppliers, Vendors and Contractors to make reasonable enquiries of the competence and performance standards prior to their appointment. This initial vetting procedure requires all contractors to complete a vetting questionnaire. Their answers will form the basis of the assessment. The results will be kept on record and the exercise repeated, as necessary.

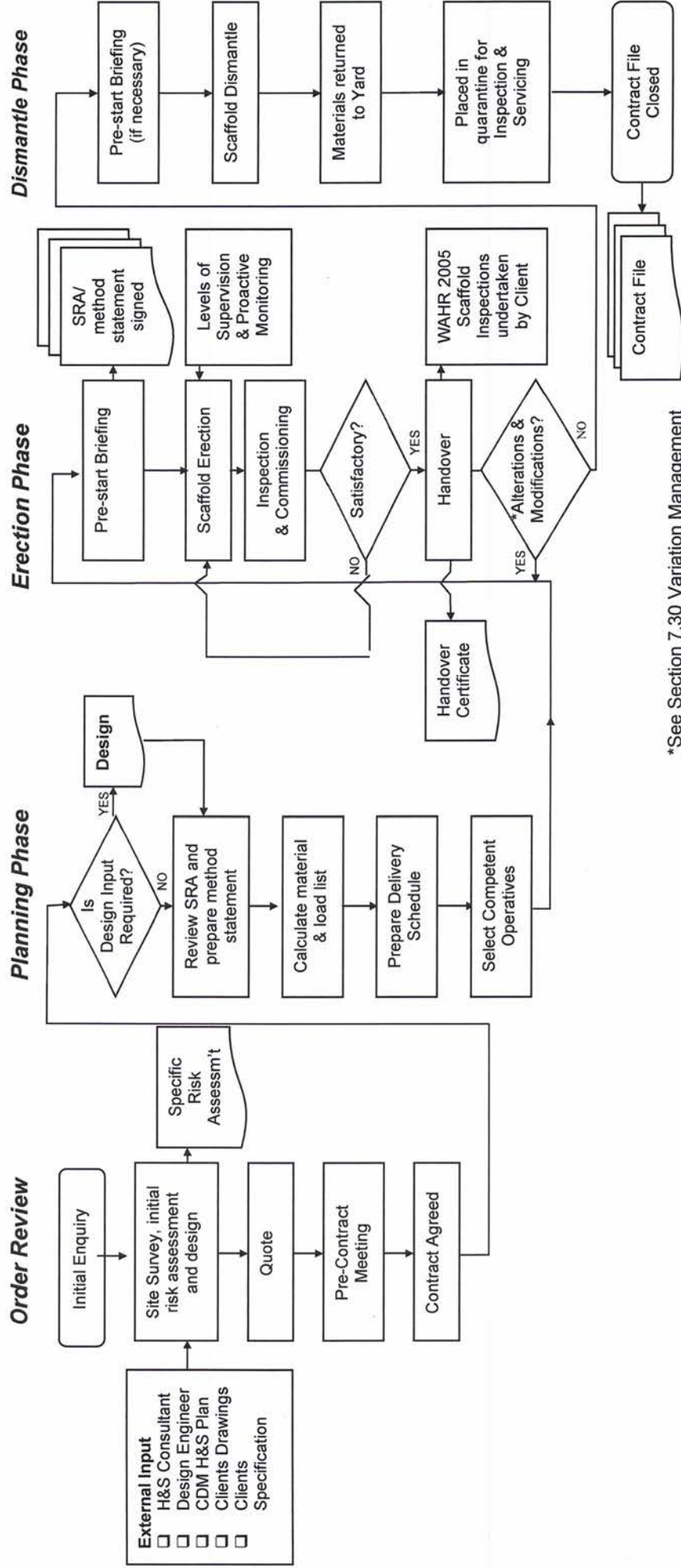
Following the assessment of the vetting questionnaire, a further assessment of the contractor may be required in the form of an audit by the Safety Consultant.

All contractors will be subject to the Company's monitoring arrangements, to ensure compliance with the relevant policies, procedures etc.

**7 Planning and Implementation**

**7.1 Overview of Main Flow Process (Management Programme)**

The purpose of this flowchart is to solely illustrate the main flow process of the main contract scaffolding operation for the benefit of the Safety Management System. Please note that it is not comprehensive (i.e. variation requests, valuations, payment schedules etc



\*See Section 7.30 Variation Management



## 7.2 Performance Standards

This document details the performance standards for health, safety and Environment that must be adhered to. However, a number of these arrangements will be expanded upon in other documents such as: -

- Operating Procedures
- Work Instructions
- Relevant Health and Safety Regulations (See Appendix A)
- Relevant British and European standards (eg: BS EN 12811)
- HSE approved codes of practice and guidance
- NASC Safety and Technical guidance notes e.g.: SG4:22 and TG20:21

## 7.3 Risk Assessment

The identification of hazards, assessment of risk, establishing and enforcing of control measures to eliminate or control risk, are the cornerstones of effective safety management.

The Management of Health and Safety at Work (Amendment) Regulations 2006, Regulation 3, requires employers to make suitable and sufficient assessment of the risks to health and safety and to keep records of the significant findings. The Company has developed risk assessment processes to comply with this statutory requirement and follow HSE guidance "5 steps to risk assessment" and "NASC SG7:19 Risk Assessments and Method Statements RAMS's" which is Scaffolding Industry Specific Guidance.

The two risk assessment processes used are known as **Generic Risk Assessment** and **Specific Risk Assessment**. Both processes use a qualitative technique, which relies upon the judgement of a competent person (or Risk Assessor). The Risk Assessor must be appointed by Management having been deemed competent and received training in the particular techniques used. Risk assessments will be undertaken to consider the risks relating to a task, any Regulations and codes of practice that may apply to that task and encourage the active involvement of the Employees who would normally undertake the task.

Certain other pieces of legislation require specific risk assessment such as COSHH and the Manual Handling Operations Regulations 1992 (as amended), of which arrangements are made within further sections of this policy. Karl Naylor is responsible for undertaking the risk assessment with (where required) the assistance of the Safety Consultants.

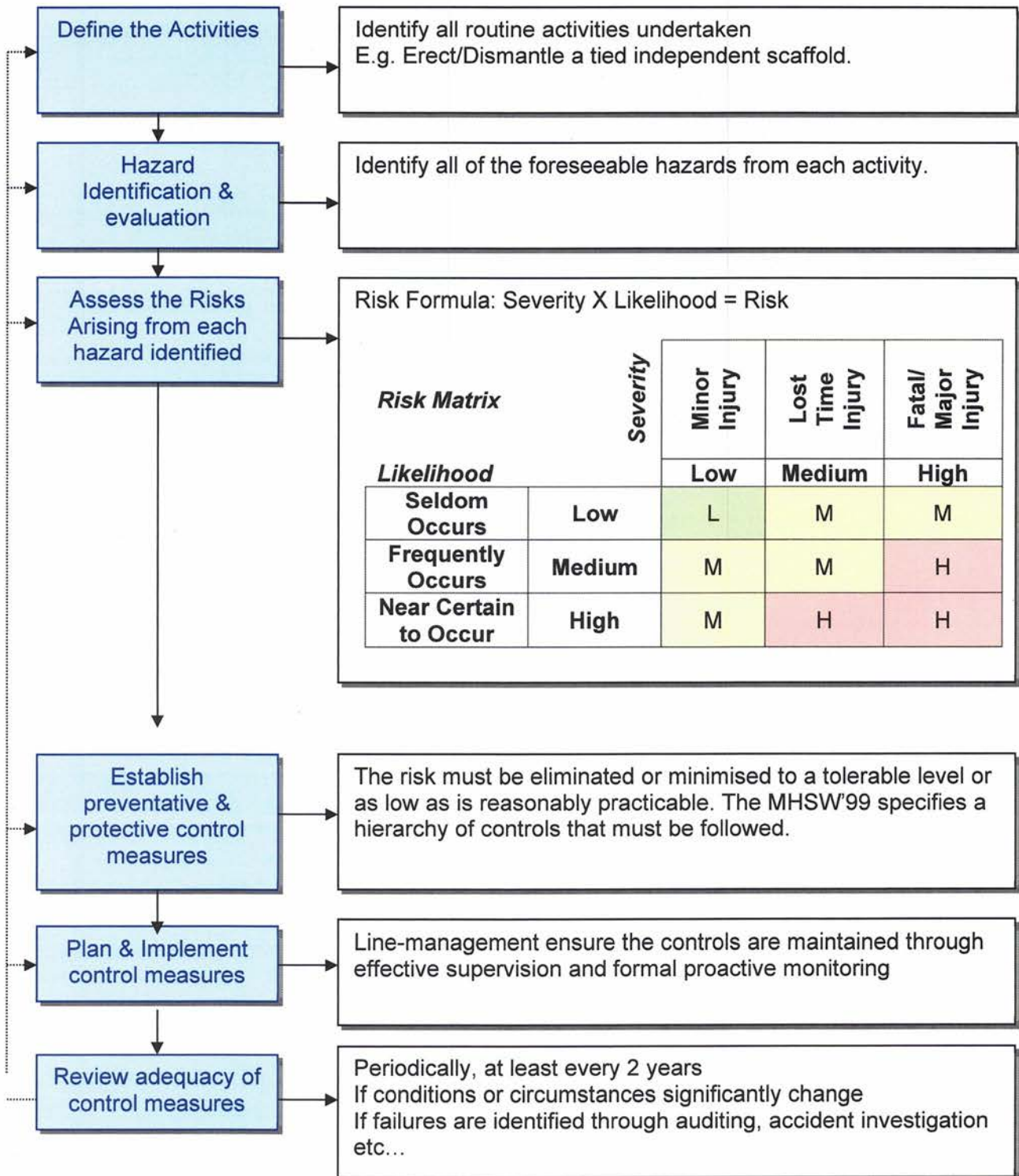
### 7.3.1 Generic Risk Assessment

Generic Risk Assessments will be prepared and implemented for all of the routine operations undertaken by Oxford Spires Scaffolding Ltd. However, they do not take account of the specific environmental conditions at the particular workplace, which is why they must always be supplemented by a specific risk assessment.

The contents of the Generic Risk Assessments to be regularly communicated to all employees via recorded and signed for toolbox talks.

The flowchart on the next page illustrates the key steps taken in the Generic Risk Assessment process: -

### Generic Risk Assessment Process



The Generic Risk Assessment must be recorded on the Generic Risk Assessment form.



### 7.3.2 Specific Risk Assessment (SRA)

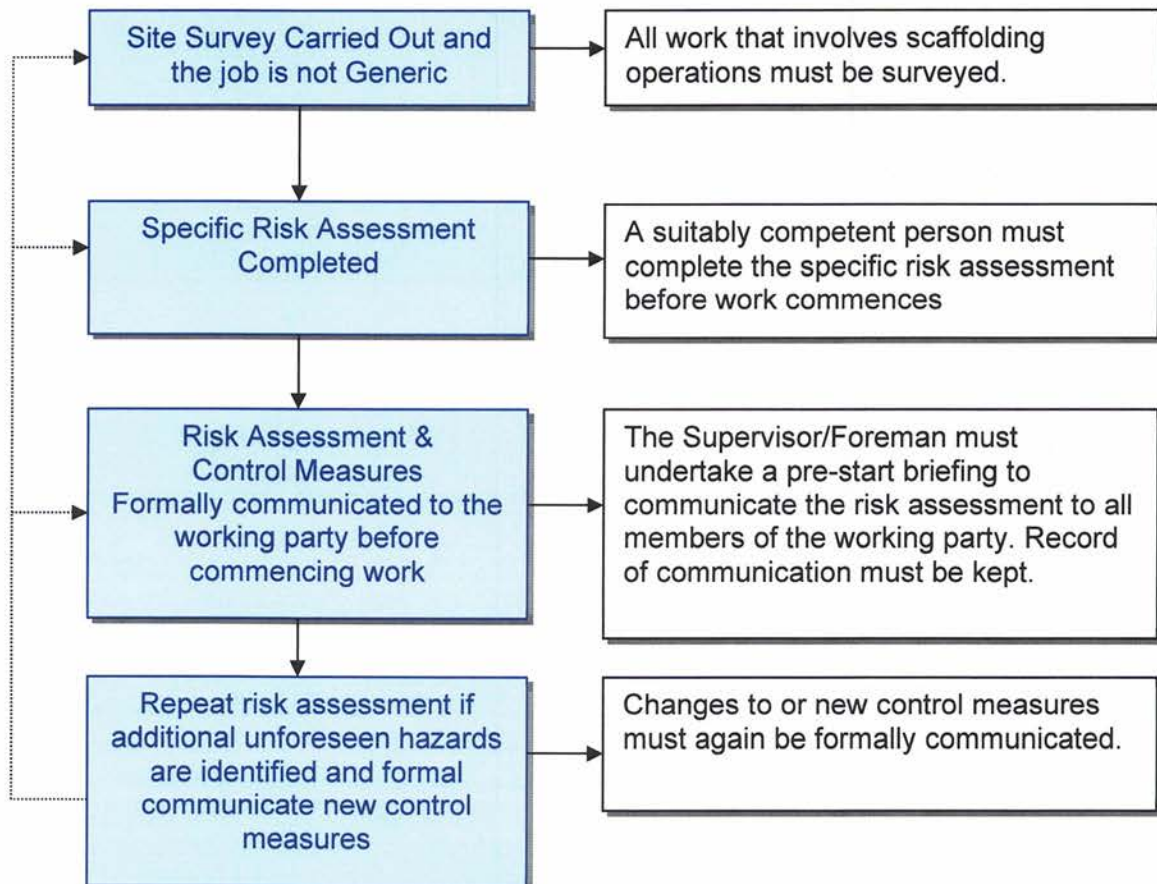
When the job is not generic, a specific risk assessment must be carried before each job commences (Scaffolding operations only). The assessment process is similar to the Generic; however, it is simplified using a checklist type proforma to assist the Risk Assessor to identify the hazards. Also, an overall risk rating is awarded rather than for each hazard identified.

Form reference SRA

The SRA must be formally communicated to and signed by all employees involved in the operation before commencing.

This flowchart illustrates the basic principles required for the Specific Risk Assessment process: -

#### **Specific Risk Assessment Process**





#### 7.4 Method Statements and Scaffolding Plans

It is a requirement of the Work at Height Regulations 2005 (Schedule 3 part 2) that a scaffolding plan is needed prior to the erection, use or dismantling of Scaffolding. This statutory requirement is undertaken by Oxford Spires Scaffolding Ltd by the production of method statements. It is noted that much of the work undertaken is of a standard nature and as such generic method statements are produced for this regular work and are part of the Companies standard operating procedures. Where work is non-standard a specific method statement will be produced.

Method Statements are prepared by a competent person and formally communicated to the Operatives by way of a method statement briefing which the operatives sign, date and record time to confirm that they have understood the briefing and agree to work in accordance with the method statement.

All method statements should include the following:

- The clients details
- Details of the location
- Full description of the activities to be undertaken
- Specific equipment to be used
- TG20:21 "compliance sheet" and/or Scaffold Design Drawing
- Sequence of events or work method
- Significant hazards identified through the risk assessment
- Specific control measures to be adopted
- Details of rescue plan to be adopted

The standard Company method statement format should be used.

The method statement, once submitted and approved by the client, must be formally communicated to and signed by all employees involved in the operation before commencing work.

#### 7.5 Preventing falls

All Scaffolding Operatives shall be equipped with the suitable and approved fall arrest equipment for the task, before commencing work at height.

All fall arrest equipment provided must conform to the relevant British and European Standards. Each Scaffolding Operative shall be issued with the following fall arrest equipment, as a minimum and records of issue kept: -

- Full body harness complete with rear dorsal ring to BS EN 361.
- 1.75m - 2.0m fixed length lanyard complete with shock absorbing device to BS EN 355.
- Scaffold hook/connector/Karabiner with 55mm opening to BS EN 362.

All scaffolding operations shall be carried out in compliance with the National Access and Scaffolding Confederation (NASC) Guidance Note SG4:22, "Preventing Falls in Scaffolding Operations", as a minimum safe system of work.

In addition, other measures may be specified for fall prevention and protection within the risk assessment and/or method statement.

Oxford Spires Scaffolding Ltd is introduced the use of the "Combisafe Scaffoldstep" in order to meet the requirements of collective fall protection methods required by SG4:22. Management and all scaffolding operatives will receive training on these working methods.

Rescue of any Operative who is suspended in a safety harness following a fall is considered and the Company has specific rescue plan dealing with this event which includes the risk of suspension trauma. It is essential that information on rescue methods is included in toolbox talks and on risk assessments and method statements.

Where a client has established local rules that exceed the requirements of this procedure they must be adhered to and adopted and enforced as procedure.

All scaffolding operatives involved in the erection, alteration and dismantling of scaffolding, shall receive appropriate training in the established control measures to prevent and protect against falls from height in line with SG4:22. All line-management with managerial and supervisory responsibility for scaffolding operations shall attend such training. Karl Naylor is responsible for arranging and recording this training.

All line-management with managerial and supervisory responsibility for scaffolding operations shall ensure compliance through effective monitoring (formal and informal) and enforcement, as necessary.

All fall arrest equipment (including "Scaffoldsteps") must be subject to a thorough 3 monthly examination and servicing in line with the manufacturer recommendations. Records of thorough examination must be maintained, Karl Naylor is responsible for ensuring that these inspections are carried out and recorded.

The user is required to carry out a pre-use inspection of their fall arrest equipment. The requirements of the pre-user inspections are covered in the SG4:22 training package.

## 7.6 **Work at Height**

Under the Work at Height Regulations Oxford Spires Scaffolding Ltd will comply with the hierarchy of control to avoid, prevent and mitigate the need to work at height at all times and will always consider collective protection over personal where applicable.

Work at Height is deemed as any place from which, if measures required by these regulations were not taken, a person could fall a distance liable to cause personal injury including below ground.

Oxford Spires Scaffolding Ltd will at all time use competent personnel to organise and plan work at height and competent personnel to erect, dismantle and modify scaffolding as required.

Environmental conditions need to be considered at all times that may adversely affect health and safety during scaffolding operations.

Oxford Spires Scaffolding Ltd will ensure that working platforms used for construction from which a person could fall more than 2 metres will be under an inspection schedule by themselves or the user.



Scaffold should be erected to strength and stability calculations unless erected to a recognised standard.

Top Guardrail heights must be 950mm and the maximum gap should not exceed 470mm. Working platforms should have no gaps where people or objects can fall.

Signs and Barriers must be in place on working platforms showing areas where access is not permitted.

Employers should also make provision for inspection of equipment used in Work at Height.

## 7.7 Work Equipment

All work equipment (including hand tools, appliances, computers scaffolding materials etc.) must be designed and suitable for the purpose for which it is to be used and only use for operations for which it is designed.

The use of work equipment is restricted to those persons appointed to do so and must only be repaired and maintained by nominated competent persons. A service log recording all repairs and maintenance must be kept for all plant equipment and vehicles.

Karl Naylor must ensure that all employees receive all necessary information, instruction and training in the use of work equipment, including where appropriate written instructions. Any work equipment found to be defective must be reported to the immediate Supervisor who will arrange for the equipment to be taken out of use and clearly marked as defective.

### 7.7.1 Scaffolding Materials

All scaffolding components and associated materials such as ladders etc. must be subject to a material control procedure, which ensures so far as is reasonably practicable the inspection and where appropriate the testing of all materials periodically. A competent person who carries out the inspections must ensure the segregation of defect material for destruction or repair, to prevent use.

The appointed person must be deemed competent by his manager having received appropriate training and instruction.

All operatives when handling scaffolding materials must not use defective materials. Any defective materials must be segregated and returned to the yard for quarantine.

All scaffolding materials must be handled in a controlled manner (e.g. hand to hand) and NEVER thrown or allowed to drop – Any Scaffolder/Operative found bombing material will be referred for disciplinary action, which may lead to instant dismissal.



### 7.7.1.1 System Scaffolding

Where the Company undertakes work with system scaffolding materials (eg: System scaffolding staircases) then these must come under the controls as set out in 7.7.1 above to ensure the quality and suitability for use of all of the components.

In addition, all operatives must receive instruction and training covering the manufacturer's requirements and system specifications, this training to be arranged and recorded by Karl Naylor.

### 7.7.2 Mobile Plant & Vehicles

All mobile plant and commercial vehicles must be subject to regular maintenance and servicing in accordance with the manufacturer instructions and statutory provisions e.g. Lifting Operations and Equipment Regulations 1998. In addition, all mobile plant and commercial vehicles must be subject to weekly formal inspections by the operator.

Any defects identified must be reported to the Company Director and the findings and remedial action recorded in the report.

All mobile plant with a risk of rolling over must be fitted with an appropriate rollover protection system (ROPS) and seatbelt(s).

#### 7.7.2.1 Forklift Trucks

Only appointed Lift Truck Operators, who have received training from an approved body and are deemed competent, as detailed in the Health and Safety Executives Approved Code of Practice COP L117 Rider Operated Lift Trucks; Operator Training, are permitted to drive forklift trucks.

All forklift truck operations to be carried out in accordance with HS (G) 6 Lift Trucks; Safety in Working, also these specific precautions must be taken: -

- Do not overload the lift truck in excess of the manufacturers' recommended safe working load.
- Passengers must not be carried unless an additional seat is fitted for the purpose.
- Do not leave the forklift truck unattended, with the engine running, the keys in the ignition or the forks raised.
- Palletised loads must be checked for security before carriage.
- Seat belts must be used.
- Forklift trucks must not be driven at excessive speed. Speeds must be limited to suit workplace conditions.
- Suitable warning signs to be positioned in the workplace to warn pedestrians and other vehicles of the presence of forklift truck operations.

- ❑ Operators must sound their horn when leaving and entering the buildings or when negotiating blind bends etc.
- ❑ Extra care must be taken when working on a slope or crossing a gradient.
- ❑ Convex mirrors must be fitted to ensure all round visibility of at least 1m high by 1m long. If this is not possible then a Banksman must be used where the driver's vision is obstructed or when manoeuvring in a restricted area.
- ❑ Pedestrians always have right of way.
- ❑ The forklift truck must be subject to a planned maintenance programme that includes a 12 monthly thorough inspection carried out by an approved Engineer. The vehicle must be checked by the operator before each use, especially the brakes.
- ❑ All forklift trucks must be fitted with an audible reversing warning and flashing beacon to be used whenever the vehicle is in operation.

#### 7.7.2.2 Mobile Elevating Work Platforms (MEWP's)

All MEWP operators must hold a current IPAF Operators Certificate or equivalent, the MEWP must be operated in strict compliance to IPAF training and guidance including the requirements for Daily, weekly and statutory inspections.

All employee using "Cherry picker" type MEWP's at shall be subject to the wearing and use of a fixed length safety lanyard with their safety harness (without a shock absorber). All MEWP's shall have a clearly designated anchor point within the platform that is capable of sustaining the likely forces imposed.

#### 7.7.3 Electrical Equipment

It is Company policy to use 110v or low voltage battery operated hand tools wherever possible. Where 240v hand tools are to be used they must be used in conjunction with a residual current device (RCD).

All site portable electrical equipment must be inspected (eg: Drills) and portable appliance tested (PAT) every 3 months, All RCD's must be tested every 6 months, office equipment to be tested every 3 years by a competent engineer. An inventory of all equipment must be maintained and all new equipment is added to the list. Each piece of equipment must be clearly marked with the date of the test and the date of re-testing.

The electrical installations to all company buildings will be tested at least every 5 years, by a competent engineer.

Karl Naylor is responsible for ensuring that all portable electrical equipment and electrical installations are regularly inspected and that such inspections are recorded.



#### 7.7.4 Machinery Guarding

All dangerous moving parts creating a danger zone must be assessed and the Company must establish and enforce all reasonably practicable control measures by following the hierarchy of control measures defined in Regulation 11 of the Provision and Use of Work Equipment Regulations 1998.

#### 7.7.5 Lifting Operations & Lifting Equipment

A person(s) shall be appointed, who has received appropriate training to be deemed competent, to plan and supervise lifting operations, as necessary to ensure they are carried out in a safe manner.

To ensure Lifting equipment and lifting accessories (e.g. chains, slings, shackles, fittings buckets, gin wheels and ropes etc.) is maintained in good order the Company shall nominate a person (and deputy) to be responsible for the storage, maintenance and inspection of all lifting equipment and accessories owned and controlled by Oxford Spires Scaffolding Ltd, as required by the Lifting Operations & Lifting Equipment Regulations 1998 (LOLER'98).

All lifting equipment shall be inspected and thoroughly examined, as required by Regulation 9 of LOLER'98. Copies of all inspection reports and certificates shall be kept on site and made available for examination when required.

All lifting equipment must have the Safe Working Load (SWL) clearly marked on it, with the required Safe Working Load established before use.

Suitable storage accommodation must be provided to prevent physical damage or deterioration.

### 7.8 Occupational Health

#### 7.8.1 Manual Handling

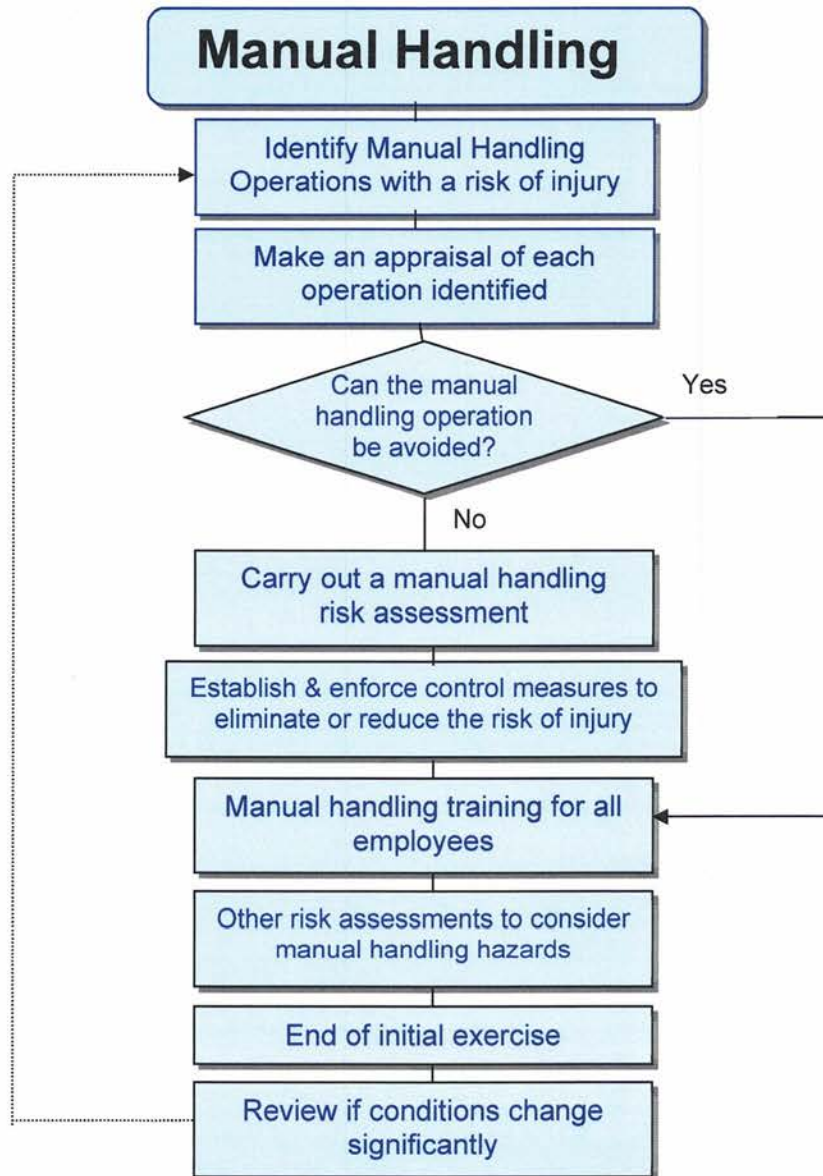
The Manual Handling Operations Regulations 1992 (as amended) requires employers to avoid manual handling operations and where they cannot be avoided to make an assessment of the risk of injury to establish control measures to reduce those risks as low as reasonably practicable.

Oxford Spires Scaffolding Ltd recognises that manual handling is inherent part of the scaffolder's trade and that the special handling techniques used in scaffolding are essential enabling skills. These skills are taught as part of the current Construction Industry Scaffolders Record Scheme (CISRS).

NASC SG6:22 Management of Manual handling in the scaffolding industry gives scaffolding specific advice. A SG6 manual handling video can be viewed free using the following link: <https://nasc.org.uk/information/sg6-video>

In addition, the Company carries out manual Handling training and toolbox talks to all other Operatives who may need to manually handle Scaffolding materials. The flow chart shown on the following page outlines the steps taken to comply with the requirements of the Manual Handling Operations Regulations 1992 (SEE NEXT PAGE): -





### 7.8.2 Hazardous Substances

Arrangements are in place to assess the effects of any substances identified as hazardous to health and the adoption of relevant control measures, as required by the Control of Substances Hazardous to Health (Amendment) Regulations 2002 as amended (COSHH).

All suppliers of materials are required to provide all relevant health and safety information about their products to form the basis of the COSHH risk assessment. This information is to be requested for each product before procurement stage, so that consideration can be made for the use, handling and storage of that substance as per COSHH.

The COSHH assessment must be carried out by an appointed competent person, Karl Naylor with the assistance of the Safety Consultants (if required).

Scafezze is used by the Company as a scaffold fitting lubricant and rust inhibitor, as COSHH assessment has been carried out and found that this substance is safe to use. It is Karl Naylor responsibility to ensure that all operatives who use this substance have seen the COSHH assessment and are provided with the PPE required

### 7.8.3 Asbestos

Oxford Spires Scaffolding Ltd does NOT undertake scaffolding work in relation to works carried out by our clients working with asbestos containing materials as 98% of our work is carried out on new build sites.

In the very rare situation that we work on a site that is not new build, the Company will provide basic asbestos awareness training to all site Operatives and Managers and Supervision who attend site (where a building was constructed before the year 2000 and may have asbestos present) or manage or supervise other who do attend site. The purpose of the training is to increase awareness so that materials containing asbestos can be identified, to reduce the risk of accidental exposure and establish suitable contingency measures should asbestos materials be accidentally disturbed.

### 7.8.4 Noise

Similar to other pieces of legislation, the Noise at Work Regulations 2005, requires a risk assessment to be made, to ascertain the noise levels employees are exposed to, establishing and implementing precautions to avoid or protect against excessive noise levels.

The regulations require all exposure to noise to be reduced so far as is reasonably practicable and specifies the following action levels: -

- ❑ First Action Level 80 dB (A), exposure should be reduced below this level and hearing protection must be provided if requested.
- ❑ Second Action Level 85 dB(A), exposure must be reduced below this level and hearing protection zones created where hearing protection must be worn.
- ❑ Maximum exposure level 87 Db (A) taking into account any protection used.

As part of the assessment, competent person using specialist equipment, must measure noise exposure. The noise exposure is calculated over an equivalent eight-hour shift known as the Lep'd.

Engineering solutions must be considered as the first line of control. When the adoption of reasonable engineering or management control fails to reduce the exposure to an acceptable level, only then will resource be made to the use of Personal Protective Equipment.

All noise assessments will be reviewed periodically and if the process changes (i.e. new plant and equipment). Noise exposure shall be considered during the selection of new plant and equipment.



### 7.8.5 Vibration

The Control of Vibration at Work Regulations 2005 introduces controls in order to reduce prolonged and regular exposure to high levels of vibration known as Hand/Arm Vibration Syndrome or "HAVS". HAVS is caused in the main by prolonged and regular use of vibrating power tools such as angle grinders, saws and hammer drills.

The Company undertakes assessments of all vibrating tools that it uses and has produced a procedure that indicates the maximum recommended time periods that each tool can be used for.

The Company has a purchasing policy that as far as possible ensures that vibration levels are kept to a minimum and that information is given to users by the way of toolbox talks.

### 7.8.6 Health Surveillance & Screening

Exposure to certain substances requires regular health surveillance to be carried out, to identify any hazardous effects. Health surveillance will be undertaken where identified in the COSHH risk assessment. In addition, certain pieces of legislation also require health surveillance i.e. the Control of Asbestos at Work Regulations and the Control of Lead at Work Regulations.

All new employees are to complete a pre-employment medical questionnaire, which is contained in the application form.

The recruiting manager will vet the medical questionnaire. Any medical conditions identified should be referred to the Safety Consultant for advice.

Driver/Plant Operator medical checks are to be carried out as recommended by the Ministry of Transport for Large Goods Vehicle drivers.

### 7.8.7 Stress

Stress can become a significant problem for individuals and can be a contributory factor to ill health such as heart disease or to accidents by reducing concentration. Individuals are affected by stress in different ways and many sources of stress are not related to work. However, the following guidelines should be applied

- ❑ Directors and managers must monitor workloads of employees to ensure that loadings do not exceed reasonable levels
- ❑ Employees facing difficulties outside work, which may affect their ability to deal with their work effectively, should discuss their working arrangements with the Supervisor or Contacts Manager, giving as much notice as possible.



### 7.8.8 Leptospirosis (Weil's disease)

Weil's disease is a type of leptospirosis that is a serious and sometimes fatal infection that is transmitted to humans by contact with urine from infected rats.

It can start with a flu-like illness with severe headache which can lead to vomiting, muscle pains, jaundice, meningitis and kidney failure; early treatment is essential.

Workers (including Scaffolders) who work on sites near canals, rivers, ponds, sewers, ditches, contaminated water or other areas frequented by rats are at risk. The bacteria can get into your body through cuts and scratches, through the lining of your mouth, throat and eyes after contact with infected rat urine.

To protect yourself:

- Keep areas free from food rubbish so as not to attract rats
- Do not touch a rat (dead or alive) with unprotected hands
- Wash cuts and grazes immediately with soap and water and cover all broken skin with waterproof plasters before and during work
- Wear protective clothing (eg: gloves)
- Wash your hands after handling any animal, contaminated clothing or other materials
- ALWAYS wash your hands before eating, drinking or smoking

### 7.8.9 Coronavirus: Covid-19

The Company is fully aware of the responsibility for ensuring that health risks associated with Covid-19 are identified and controlled to protect our employees whilst working for the Company. The policy for managing these risks are as follows:

In order to discharge our duty as effectively as possible in the light of the new threat that is Covid-19; it is vital that we continue to remain up to date with the latest guidance on this subject.

The research is ongoing and new information may come to light at any time that may change the way we need to deal with this hazardous agent.

Our approach to controlling risks will be detailed on risk assessments for company activities. These will be updated following new research or guidance. Risk assessments for visiting construction sites will be updated in line with current versions of:

- Construction Leadership Council (CLC) Site Operating Procedures Protecting Your Workforce during Coronavirus (Covid-19).

- National Access and Scaffolding Confederation (NSAC) Guidance and Toolbox Talk for Scaffolding Operations During the Coronavirus (Covid-19) Pandemic.

Control measures for locations, situations or activities identified in risk assessments will be a combination of the following:

### **Minimize the numbers of people potentially exposed**

Those who do need to enter our offices or client's premises including construction sites because it is necessary to undertake their work tasks, will work in line with our risk assessments for each workplace/site.

### **Making use of available technology**

We will use video conferencing software, where possible, to conduct meetings and conversations.

### **Encourage good hand hygiene**

Employees and any other people on our premises or client's premises will be encouraged to wash hands thoroughly in accordance with NHS guidelines on entry into the premises and frequently throughout the day. This simple but effective measure is one of the most powerful control measures at limiting the spread of this virus.

Hand sanitizer (minimum 60% alcohol) will be made available also and should be carried by those who need to travel as part of their job.

### **Arrange the workplace to allow social distancing.**

Workplace layouts, floor markings and signage will be reviewed to ensure social distancing can be adhered too in all workplaces controlled by the Company. Employees will be given information on the use of the workplace and how to reduce the chances of contracting or passing on the virus.

### **Cleaning regimes**

The virus can live on some surfaces for up to 3 days, so controlling this risk by instigating hygiene procedures is vital. The cleaning regime for the workplace will be upgraded to accommodate the need for additional or more thorough cleaning. A detailed checklist of what is required will be drawn up.

### **Provide information, signage and warnings to employees and others**

Clear warnings and reminders will be posted and updated regularly in the workplace. All employees will be made aware of this policy and the risk assessments that affect them. Visitors to the building will be issued with information relevant to their visit.

### **Provide personal protective equipment**

Face coverings may be required in order to reduce the potential spread of the virus. In situations when social distancing is not possible, any need for either face coverings or RPE will be identified on the risk assessment.



## **Employees Duties**

All employees have a duty to take reasonable care of themselves and those affected by their acts or omissions. It is vital that the risk assessments are adhered to and that any defects or weaknesses in control measures noted by employees are reported to line management.

Employees must contact the office/line manager if they or a member of their family (who lives in the same household), has Covid-19 symptoms and /or a positive Covid-19 test result. The employee will be advised what action should be taken to ensure that current government Covid – 19 advice is followed.

### **7.9 Overhead Power lines & Underground Services**

Overhead electric power lines present a significant risk of death and/or major injury when scaffolding or handling metallic scaffolding materials in close proximity to the cables. Also, underground services need to be considered when using screw ground anchors or stacks to secure guy wires.

All work under or adjacent to overhead power lines must be subject to risk assessment with a specific method statement prepared. As a minimum this work must be undertaken in accordance with the HSE guidance note GS6 Avoidance of danger from overhead electric power lines.

### **7.10 Scaffold Inspection, Commissioning & Handover**

Complete or partially completed scaffold structures must be inspected and commissioned by a nominated competent person, to ensure that it has been erected to the required standards and is safe to use, prior to handover.

If the structure is a designed scaffold, then the inspection must ensure that the structure has been erected as per the drawings, without significant deviation.

The handover certificate shall be used to formally handover the structure or part structure and should be signed by the client's representative. If this is not possible then it should be posted, faxed or e-mailed to the client's representative.

Where Oxford Spires Scaffolding Ltd is contractually required to undertake statutory inspections of a scaffold structure or part thereof, in pursuit of Regulations 12 and 13 of the Work at Height Regulations 2005 on behalf of a client, then such inspections are required:

- a) Before being taken into use for the first time; and
- b) After any substantial addition, dismantling or other alteration; and
- c) At regular intervals not exceeding 7 days since the last inspection.
- d) After bad weather or any other event likely to have affected its stability

### **7.11 Masonry Anchor Testing**

The testing of masonry anchors used as scaffold ties is an essential element of the scaffold commissioning and handover process. The manufacturer instructions must be followed for the specific type and make of anchor used.

Anchor testing must be carried out in accordance with TG20:21 and TG4:19.

Preliminary testing should be carried to determine the suitability of the base materials and proof testing of the installed anchors to ensure their security.

The frequency of testing must be carried out in accordance with the following table: -

<i>No. of Ties per Structure</i>	<i>No. of Pullout Tests required</i>
Up to 20	Minimum of 3
More than 20	1 in 20 (5%) 1 in 10 (10%) in Brickwork

The results of the pull-out testing should be recorded on the handover certificate (No. of ties tested and results in failures or KN's), unless a specific report is prepared.

Anchors must be tested to a load of 1.25 times the working load eg:

Working load of 3.5Kn means a test load of 4.4kN

Working load of 6.1kN means a test load of 7.6Kn

Working load of 12.2kN test load of 15.3kN

Pass criterion is that no significant movement of the anchor is apparent, visual check only is sufficient.

If an anchor fails a test, then an investigation of the cause is required and an increase in testing rate as follows:

One failure – Double the test rate to 1 in 10 with a minimum of 6

Two failures – Double again to 1 in 5 with a minimum of 12

More than 2 failures – test 100% of ties, and review specification of tie and/or installation method.

Please note that “drop-in” expanding socket anchors (eg: Hilti HKD) are not recommended in Brickwork.

#### 7.12 **Protection of the Public and Others**

All reasonably practicable measures must be taken to secure the workplace to prevent the public and others (such as fellow workers, visitors, trespassers etc.), especially children being at risk of an injury.

Each location must be assessed considering the nature of the work and the location of the workplace and its environment, to establish the necessary control measures.

#### 7.13 **Personal Protective Equipment (PPE)**

All Personal Protective Equipment (PPE) purchased must meet the necessary European Standards and carry the CE Mark.

The risk assessment process together with our client arrangements (i.e. Site Rules, Permit-To-Work Systems etc...) should identify a requirement for PPE. PPE will only be specified as a last resort in the hierarchy of controls.

An assessment of the PPE must be carried out as required by the Personal Protective Equipment Regulations 1992 and the Personal Protective Equipment at Work



(Amendment) Regulations 2022, to ensure the correct selection and suitability for the user.

Under the new 2022 amendment employees/workers have a statutory duty to use PPE provided as part of a safe system of work and not misuse or interfere with it.

All new employees/workers receive a full issue of PPE when they commence employment. If any item of PPE required is not available, expired, damaged or defective then it shall be replaced upon request. A record of all PPE issued must be maintained, signed for by the recipient.

No charge can be made to employees/workers for the issue of PPE.

#### 7.14 Scaffold Design

All scaffolding will be provided in compliance with the relevant British and European Standards, including NASC TG20:21, the Work at Height Regulations 2005 and the Construction (Design and Management) Regulations 2015.

Any scaffold structure requiring design input e.g. Scaffolds that do not comply with a TG20:21 Compliance sheet will be subject to a design risk assessment. Calculations will be made by a suitably competent Design Engineer and drawings produced. Any significant hazards or hazardous work sequences that can't be designed out shall be detailed on the drawing in text, also where appropriate within the specific method statement.

Anticipated significant deviations from the original design criteria, revealed during the execution of the work needs to be communicated to the Design Engineer to ensure structural integrity is maintained.

An aide memoir checklist has been prepared as a guide to the Management and Foremen to help identify when Design input is required. This document is known as the Design Matrix (appendix B).

#### 7.15 First Aid & Emergency Arrangements

An assessment will be made of the risk of serious and imminent danger at the workplace and Oxford Spires Scaffolding Ltd will ensure that control measures for dealing with emergencies are established.

The arrangements at each workplace include: -

- Raising the alarm and communication with the emergency services.
- First aid.
- Firefighting capabilities, including a fire risk assessment.
- Emergency Evacuation.
- Assembly.
- Appointed persons, training, drills and exercises.

Karl Naylor is responsible for checking that a first aid kit is provided for each Company vehicle and that it is kept replenished with "in date" equipment and consumables, this will be checked as part of the Company internal audits. First aid equipment and trained personnel to administer first aid will be provided and maintained in accordance with

the Health and Safety (First Aid) Regulations 1981, Approved Code of Practice and Guidance L74, (as amended in December 2013) as a minimum standard.

It is the intention of Oxford Spires Scaffolding Ltd to comply with the site-specific arrangements made by our Clients.

However, in such circumstances where the Client makes total arrangements for first aid the Company will ensure that employees have basic knowledge to administer immediate aid.

#### 7.16 **Welfare Facilities**

Welfare facilities will be provided in compliance with the Workplace (Health, Safety & Welfare) Regulations 1992, the Construction (Design and Management) Regulations 2015 and their relevant Approved Codes of Practice and Guidance and NASC SG18:14 "Welfare facilities for the Scaffolding Contractor" as a minimum standard.

Additional facilities will be provided as per the client's contractual requirements and the desire to project a good company image.

An employee found to be defacing or misusing the Welfare Facilities will face disciplinary action.

#### 7.17 **Housekeeping**

Housekeeping is an essential feature of accident prevention e.g. trip hazards, fire hazards etc. The subject of housekeeping must be integrated into all monitoring and auditing arrangements to ensure high standards of housekeeping are maintained.

#### 7.18 **Smoking at Work**

The Smoke Free Premises etc Regulations 2006 came into effect on 1<sup>st</sup> July 2007 the law was introduced to save lives and prevent diseases caused by second-hand smoke.

The effect of the law will be that at Oxford Spires Scaffolding Ltd Staff, Clients and Visitors will not be able to smoke in the business premises if they are 'enclosed' or 'substantially enclosed', this includes previously designated smoke areas.

A No Smoking Sign will be placed in a prominent position at or near each entrance so that people entering can see it, and it must include the statement "It is against the Law to smoke on these premises"

The Smoke free legislation also covers ALL Vehicles which are used to transport clients, visitors or which are used by more than one employee in the carrying out of work duties even if this use is only intermittently.

The Company are required by Law to display a No Smoking sign in all company vehicles covered by the legislation (enclosed vehicles used to transport the Public or used by more than one employee for carrying out work duties)

#### 7.19 **Substance Abuse at Work**

Substance (including alcohol and/or drug or other substance) abusers can adversely affect the safety of themselves and fellow workers whilst at work. Therefore, if any



employee or contractor is known to be, or strongly suspected of being affected by alcohol or drugs they are to be referred to their immediate supervisor who must arrange for their removal from the workplace.

Employees are not permitted to bring prohibited substances onto company premises or to work.

Any employee who is required to take prescription substances that may affect their performance at work must inform their immediate Supervisor. Alternative duties may be allocated to these employees and they must be prohibited from driving/operating plant equipment and working at height.

All employees are prohibited from consuming alcoholic drinks or drugs at work or from working under the influence of drugs, alcohol or other substances that may impair the proper performance of their duties on sites or Company premises. It should be noted that it can take well over 24 hours for drugs or alcohol in the blood to disperse and that some of the Companies clients carry out random testing with very low acceptable alcohol limits.

The Company tolerance for alcohol consumption on site during working hours and its affects at work is zero. The Company reserves the right to test any employee who it suspects of abusing drugs; also, the right to dismiss any employee who is found to be positive or who refuses to comply with the request for a test to be undertaken.

#### 7.20 **Young Persons at Work**

A young person at work is a person under the age of eighteen (18) and can be an employee, visitor or student on work experience.

Before a young person starts work e.g. trainee, apprentice etc. a suitable and sufficient risk assessment must be carried out on all their activities. Any residual risk that remains that cannot be eliminated and has been controlled so far as is reasonably practicable must be communicated to the young person (and in the case of a young person under 16 their parents/guardian and written consent obtained).

Special supervision arrangements must be made for young persons at work and the Company will ensure that they will always work under the direct and immediate supervision of a Scaffolder or Advanced Scaffolder (in the case of a Trainee Scaffolder) who has been formally nominated as the Trainees mentor.

#### 7.21 **Dealing with the Enforcing Authorities**

The Director will meet any representative of an Enforcing Authority e.g. the Health and Safety Executive, Local Authority, Environment Agency, Police etc., unless this responsibility has been delegated to another appointed person. The visiting officer must be directed to the Director or if they wish to proceed unaccompanied the Director must be notified directly.

Full co-operation must be given to assist them in the execution of their duties.

If enforcement action is taken such as a Prohibition Notice or Improvement Notice issued, then the person to whom it is issued must comply with any immediate requirements and contact a Partner directly.

The Safety Consultants will be able to provide the Director and Management with any practical interpretation and advice on the necessary corrective action required for complying with the Notice.

The Director will liaise with the relevant inspector and inform him/her of corrective action taken and confirm this in writing.

If as part an investigation by the enforcing authorities, any employee is required to make a statement or interview under caution, then the company appointed solicitor should be present.

#### 7.22 **Hot Work (Welding, Burning, Cutting or Grinding)**

The term 'Hot Work' means any work using equipment that produces heat or source of potential ignition and fire, such as welding operations, gas burning or cutting and abrasive wheel cutting or grinding. A suitable and sufficient assessment of the risk arising out of these activities must be undertaken.

#### 7.23 **Work on or near the railway**

At present the Company do NOT undertake any scaffolding work on or near to the railway. If the Company undertakes any such work in the future, then projects undertaken for the rail authority or a rail authority approved contractor on or near a railway must be carried out in strict compliance with the rail authority's safety standards.

#### 7.24 **Confined Spaces**

A confined space can be any space of an enclosed nature where there is a risk of death or serious injury from hazardous substances or dangerous conditions (eg lack of oxygen).

All activities involving work in confined spaces must be carried out in compliance with the Confined Spaces Regulations 1997, Approved Code of Practice and Guidance, introduced in January 1998 and SG21:17 "Entry into Confined Spaces".

#### 7.25 **Construction (Design and Management) Regulations 2015**

Oxford Spires Scaffolding Ltd has an understanding of the Regulations and understands the duties of:

- The Client
- Principal Designer
- The Principal Contractor
- Designer
- Contractor
- Worker

Oxford Spires Scaffolding Ltd is often engaged as a Contractor as defined by the Construction (Design and Management) Regulations 2015 and as such will comply with the Regulations as applicable, in particular we will:

- Plan, manage and monitor our work to ensure that it is carried out without risks to health and safety.



- ❑ Co-ordinate our work with others in the project team and comply with any reasonable directions issued by the Principal Designer or Principal Contractor, and with any rules in the Construction Phase Health and Safety Plan that are relevant.
- ❑ Submit any relevant risk assessments and method statements as required.
- ❑ All scaffold designs take into account risks to those erecting, altering, using and dismantling scaffolds with risks that can't be designed out highlighted for separate risk assessments and method statements at all stages.
- ❑ Ensure that all operatives are trained and competent to carry out the tasks to which they are assigned and are suitably managed and supervised.
- ❑ No operatives will begin work until they have received basic information, such as the site induction from the Principal Contractor, and the contents of relevant sections of the Construction Phase Health and Safety Plan and details of our risk assessments and method statement.
- ❑ Consult with our employees on all Health and Safety issues to ensure that hazards are highlighted and reported to improve health and safety.

#### 7.26 Mobile Phones

Employees must not use mobile phones whilst operating any vehicle unless that vehicle is fitted with an integrated hands free system (and then keep such calls as short as possible, ringing back when parked in a safe place; never send or read text messages unless vehicle is parked in a safe place).

Site Operatives must have mobile phones (either Company or privately owned) turned off at all times whilst working on or near scaffolding on site.

#### 7.27 Office Safety

All clerical and administration employees are required to receive general office safety instruction and training, as appropriate; including the Companies fire/evacuation procedures and provision for first aid procedures.

##### 7.27.1 Display Screen Equipment (DSE) User & Operator

The Health & Safety (Display Screen Equipment) Regulations 1992, requires employers to identify Users and Operators (operators include the self-employed, agency workers and contractors) of display screen equipment and to carry out an assessment of their work activities and workstation. Karl Naylor is responsible with the assistance of the Safety Consultants (if required) for undertaking the assessment process and recording results.

A User (or Operator) is defined as a person dependent on using a display screen, who is required to use equipment every day for a minimum of one (1) hour. Once Users (or Operators) have been identified, a competent assessor will undertake the risk assessment.

Following the assessment, the control measures established as reasonably practicable will be implemented and could include: -

- ❑ Redesigning tasks and work routines to include regular breaks.

- ❑ Provide correct workplace equipment to improve ergonomics.
- ❑ Make changes to the environment e.g. lighting, ventilation, temperature etc.
- ❑ Provide User/Operator training and instruction.

#### **7.27.2 Eye Tests & Corrective Devices**

All employees, who have been identified as DSE Users and use corrective devices for sight (glasses or contact lenses) for close work, are required to wear them when operating DSE.

The Company will make financial contributions for sight tests and corrective devices to employees who have been identified as users after a DSE assessment.

#### **7.28 Yard Safety**

All operatives that work in the Yard will receive a Yard induction prior to commencing work that includes full information on the Yard safety procedures and manual handling training.

#### **7.29 Records Management**

All records of formal monitoring and auditing, accident investigation reports, training records, PPE registers, records of inspection and testing, minutes from review meetings, risk assessments and medical reports shall be kept for a minimum of five years. Accident statistics and details of enforcement action should be kept indefinitely.

All records should be kept in such a manner that they are ready retrievable and protected where practicable from damage, deterioration or loss.

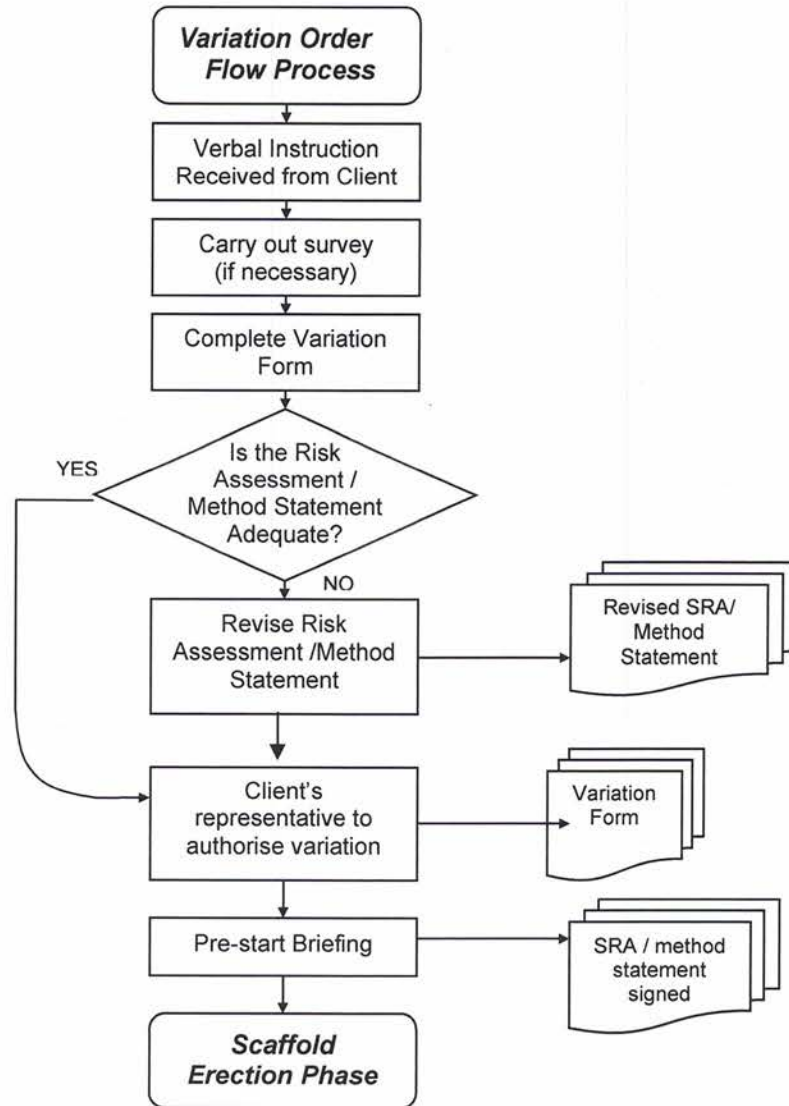
#### **7.30 Variation Management**

Many work-related injuries occur when significant changes are made to the work operation without considering any new hazards that may arise or implementing the appropriate new control measures.

All new work instructions or requests for alterations or modifications from the client that vary from the original scope of work should be directed through the Partners. All such variations must be recorded using an appropriate variation order form and signed by the client's representative.

Upon the receipt of a variation the Managing Director must review the risk assessment and/or method statement and revise them; accordingly, this should ensure that they remain suitable and sufficient for the task. This section is summarised in the flow process shown on the NEXT PAGE:





## 8 Measuring Performance

### 8.1 Reactive Monitoring

#### 8.1.1 Accident Reporting & Investigation

Certain injuries, ill health and dangerous occurrences are required by law to be reported to the enforcing authority (usually the Health & Safety Executive), under the Reporting of Injuries, Diseases and Dangerous Occurrence Regulations 2013 (RIDDOR), reported as follows:

- Work-related fatalities (Reg 6), Non-fatal (specified injury) to workers (as in Reg 4) notified to enforcing authority by quickest practical means and send report within 10 days.
- Non-fatal injury to a worker (but not a specified injury) who is incapacitated from routine work for more than 7 days, notified to enforcing authority by quickest practical means and send report within 15 days.

- Dangerous Occurrences (Reg 7) reported as in reporting procedures in Schedule 1.
- Occupational diseases (Reg 8) and reporting reported as in Schedule 1.
- Exposure to carcinogens, mutagens & biological agents (Reg 9) and reported as in Schedule 1.

Incapacitation means that the worker is absent, or is unable to do work that they would reasonably be expected to do as part of their normal work. You must still however keep a record of the accident if the worker has been incapacitated for more than 3 consecutive days.

As an employer we keep an accident book as required under the Social Security (Claims and Payments) Amendment Regulations 2012, that record can be treated as a record for the purposes of RIDDOR.

However, it is the policy of Oxford Spires Scaffolding Ltd to investigate all accidents and incidents, including near misses. The purpose of the investigation is to identify the causation and to establish and enforce measures to prevent reoccurrence and not to apportion blame.

Some organisations claim to have a 'no blame culture' for accident reporting and investigation to ensure that every employee feels that they can report accidents and co-operate with any investigation without fear of retribution. However, we promote a 'just and fair culture' which is similar to 'no blame', but there may be some apportionment of personal responsibility. Investigations must not lay blame indiscriminately; all accident investigations shall be objective, open and fair.

All employees are encouraged to report all accidents or incidents no matter how minor. The reporting of accidents by employees to the Company shall always remain a high profile topic e.g. regularly repeated toolbox talk, notices etc...

Any employee who fails to report a work-related accident or fails to co-operate with or deliberately misleads an investigation will be referred for disciplinary action.

All injuries must be reported to the immediate line-manager who will ensure that the appropriate level of investigation is undertaken and the records kept. The following matrix (NEXT PAGE) is a guide to the appropriate level of investigation required: -



**Level of Accident Investigation**

	Fatality*	RIDDOR Major Injury*	RIDDOR O7D Injury*	RIDDOR Dangerous Occurrence*	RIDDOR Disease*	3-7 Day Injury	1-3 Day Injury	Minor Injury	Significant Near Miss	Near Miss
<b>Director of H&amp;S</b>	x	x	x							
<b>Contracts Manager</b>	x	x	x	x	x	x	x	x	x	x
<b>Safety Consultant</b>	x	x	x	x	x	x			x	

\*Full written investigation report required in addition to the ARF

ALL ACCIDENT/INCIDENTS MUST BE REPORTED TO THE SAFETY CONSULTANTS AS SOON AS POSSIBLE FOR AN INITIAL DISCUSSION AND ADVICE.

IN THE EVENT OF AN ACCIDENT PLEASE ENSURE THAT PHOTOS ARE OF THE SITE OF THE ACCIDENT AS SOON AS POSSIBLE (to be used for an investigation if required).

Information on accidents/incidents are recorded in the Accident Book and/or internal Accident Record & Analysis form.

The report forms must be completed for all accidents and/or incidents. The individual completing the form keeps a copy and the other copy is entered into head office accident file once all the remedial actions are complete and closed out.

In addition to the report form a full investigation report should be prepared for more serious incidents.

All line-management that lead accident investigations will receive formal investigation training.

It is the responsibility of Janise Webb to ensure that RIDDOR injuries, ill health and dangerous occurrences are reported. However, others (e.g. Safety Consultant) may perform this duty.

**Online**

Go to [www.hse.gov.uk/riddor](http://www.hse.gov.uk/riddor) and complete the appropriate online report form. The form will then be submitted directly to the RIDDOR database. You will receive a copy for your records.

**Telephone**

All incidents can be reported online but a telephone service remains for reporting **fatal and major injuries only**. Call the Incident Contact Centre on 0345 300 9923 (opening hours Monday to Friday 8.30 am to 5 pm).

## Post

There is no paper form for reporting for RIDDOR Reporting since the online system is the preferred reporting mechanism; however, if you still need to submit a paper report then send to the following address:

RIDDOR Reports, Health and Safety Executive, Redgrave Court, Merton Road, BOOTLE, Merseyside, L20 7HS.

## RIDDOR ADVICE

Advice and guidance about what must and does not have to be reported can be found at [www.hse.gov.uk/riddor/what-must-i-report.htm](http://www.hse.gov.uk/riddor/what-must-i-report.htm) or contact the Company Health and Safety Consultants (Safety and Access Ltd) on 0115 979 4523.

### 8.1.2 Near Miss & Hazard Reporting

*Prevention is better than cure!* Near misses are painless lessons to learn from. All incidents not resulting in injury (i.e. Near Misses and RIDDOR Dangerous Occurrences) must be reported and investigated. In addition, employees all have a duty to report any hazards identified so that an assessment can be made to eliminate or control the risks arising out of that hazard.

### 8.1.3 Accident Records, Classification & Statistics

As mentioned in section 8.1.1 above, accident reporting and investigation is an essential part of the Health and Safety Management System and Company policy.

Accident records are compiled centrally at the head office, copies of the Accident Report Forms, RIDDOR F2508 forms and full accident investigations reports are kept.

Oxford Spires Scaffolding Ltd classifies its accidents into the following categories:

- RIDDOR** = Injuries resulting in a fatal or major injury or over 7 days absence from work as specified by RIDDOR.
- 3 to 7** = Injuries resulting in absence of work for more than 3 days but less than 7 days.
- 1 to 3** = Injuries resulting in more than one full days absence (not including the day the injury occurred) up to three days absence but returning at the latest by the fourth day.
- Minor** = All other injuries not incurring absence for more than the day of the injury.
- Near Miss** = Occurrences of damage to property or events where there was risk of injury, but no physical harm occurred.



Accidents are also analysed by type to examine causation and to determine trends or particular areas of concern. For this purpose, we divide accident types into further categories, as follows: -

- Fall from Height >2m
- Fall from Height <2m
- Work Equipment Injury
- Exposure to Hazardous Substance
- Slips, Trips & Falls (at the same level)
- Manual Handling Injury
- Others

Accident statistic will be compiled and distributed on a monthly basis. The statistics published are: -

- Actual number of injuries (RIDDOR, 1-3 Day, Minor and Near Miss) for the period and year to date.
- Accident Frequency Rate\* (RIDDOR, 1-3 Day, Minor and Near Miss) for the period and year to date.

\*The formula used to calculate frequency rate is:

$$\frac{\text{Number of injuries in the period} \times 100,000}{\text{Total hours worked during the period}} = \text{Frequency Rate}$$

## 8.2 Proactive Monitoring

The purpose of proactive monitoring is to ensure that the established performance standards are being adhered to and to help prevent an accident or ill health. The primary objective of the internal safety monitoring is not just to identify failure in the form of unsafe acts or conditions, but to measure success and recognise positive good behaviour.

### 8.2.1 Internal Safety Monitoring

Management shall undertake health and Safety inspections at a predetermined frequency. The inspection shall observe workplace operations and be carried out using the checklist style proforma to record the findings.

The safety Monitoring shall be undertaken in accordance with the following frequency table:

**Safety Monitoring Frequency Table**

<b>Position</b>	<b>Frequency of Monitoring</b>	<b>Reporting to</b>
Director	Quarterly	Director responsible for safety
Contracts Manager	Monthly	Director
Supervisor(s)	Bi-weekly	Contracts Manager

Copies of the monitoring report are to be retained by the Director responsible for safety (for monitoring purposes). Where it is appropriate additional copies will also be issued to the individual responsible for completing a specific action.

### 8.2.2 Independent Monitoring

Independent Monitoring is similar to the Hierarchy Monitoring but is carried out by the Independent Health and Safety Consultants. This monitoring is carried out when requested by the Company and reported directly to the Director responsible for safety.

## 8.3 Key Performance Indicators

Key performance indicators or KPI's will be used to measure the specific elements of the Safety Management System as an indicator of health and safety performance. The main KPI's used are: -

- RIDDOR injuries frequency rate
- All injury frequency rate
- Number of health and safety Immediate Action items raised.
- Compliance with the Hierarchy Monitoring schedule
- Compliance with the Toolbox Talk schedule

KPI data is used to review health and safety performance at the various formal review forums detailed in Section 7.

### 8.3.1 KPI Targets & Objectives

The Management of the Oxford Spires Scaffolding Ltd will set targets year-on-year for improvement based on the KPI's (Key Performance Indicators).

However, it is important to note that the primary purpose of the KPI's and targets is not to penalise failure but to identify opportunities for improvement and recognise success. It is very important not to place too much emphasis on achieving targets as this may have a negative effect resulting in deliberate under reporting.

## 9 Reviewing Performance

### 9.1 Health & Safety Review Meetings

To achieve excellence in health and safety performance we need to regularly evaluate our performance in order to maximise learning and take appropriate action, thus ensuring '*Continuous Improvement*'.

Health and safety is integrated into all formal review meetings.

A dedicated health and safety review will be held between the Directors, and the Safety Consultants at least annually.

An agenda must be set and minutes of the meeting taken to record findings and actions.

The agenda of each meeting must include



- a) Significant Issues raised from formal monitoring and auditing.
- b) In-company communications and consultations
- c) Information received from external parties (HSE, NASC, complaints)
- d) Health and Safety performance
- e) Review of Health and Safety objectives
- f) Accident/incidents (including actions taken)
- g) Follow up actions from previous review
- h) New or forth coming legislation, codes of practice or best practice advice

## 10. Other Policy Statements

### 10.1 Environmental Policy Statement

Oxford Spires Scaffolding Ltd supplies an access scaffolding erection service with traditional tube and fittings from Birmingham in the North to Portsmouth in the South and from Bristol in the West to London in the East.

The company attaches great importance to protecting the environment and will continue to work towards introducing procedures and the use of materials to help to minimize any potential adverse effect on the environment caused by the carrying out of our and our clients day to day operations.

Oxford Spires Scaffolding Ltd will therefore:

- Comply with all applicable environmental legislation and codes of practice.
- Take positive action to minimise waste and encourage recycling for the company and its clients.
- Maintain management controls and procedures to implement environmental objectives.
- Work with suppliers and clients to encourage the sourcing of materials from sustainable resources.
- Improve efficiency in the use of fuel, water and raw materials.
- Raise company and client's awareness of and commitment to maximising environmental performance.
- Review the Company environmental policy annually to take account of legislative and organisational changes.

Creation of an effective organisation is dependent upon the commitment and involvement of all employees. Employees will receive information, instruction, supervision, and training as is relevant to the activities they are undertaking.

This statement is endorsed by the Company's Directors, who take responsibility for its execution and share responsibility for the implementation of this policy.

**Signed:**



**Karl Naylor**  
Director responsible for the Environment

**Dated: 31<sup>st</sup> January 2023**



## 10.2 Equal Opportunities and Diversity Policy Statement

It is the policy of Oxford Spires Scaffolding Ltd to give equal opportunity regardless of sex, sexual orientation, marital status, race, age, disability, religion or ethnic origin or in relation to any protected characteristic as defined by the Equality Act 2010. This applies to recruitment, training, pay, conditions of employment, allocation of work and promotion.

As an equal opportunity employer our key criterion for selection, promotion, training and reward is the ability to do the job to the required standard. For this reason, we will not discriminate on any grounds unrelated to performance, regardless of whether these are prohibited by law.

To ensure that this policy is operating effectively (and for no other purpose) Oxford Spires Scaffolding Ltd maintains records of employees and applicants' racial origins, gender and disability.


On-going monitoring and regular analysis of such records provide the basis for an appropriate action to eliminate unlawful direct/indirect discrimination and promote equality of opportunity.

This policy applies not only to our staff but also to our relationships with our customers and suppliers.

It is your personal responsibility as an employee or sub-contractor operative to ensure that this policy is adhered to. Any questions or doubts about the application of the policy should be directed to your line Manager.

The Director responsible for Equal Opportunities is responsible for the effective implementation of the policy.

**Signed:**



**Karl Naylor**  
**Director responsible for Equal Opportunities and Diversity**

**Dated: 31<sup>st</sup> January 2023**

### 10.3 Slavery and Human Trafficking Policy Statement

Oxford Spires Scaffolding Ltd is committed to a work environment that is free from human trafficking, forced labour and unlawful child labour (collectively "human trafficking and slavery") in line with the Modern Slavery Act 2015. It also strongly believes that it has a responsibility for promoting ethical and lawful employment practices.

- Human Trafficking: the recruitment, transportation, transfer, harboring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person for the purpose of exploitation.
- Forced Labour: all work or service, not voluntarily performed, that is obtained from an individual under the threat of force or penalty.
- Harmful Child Labour: consists of the employment of children that is economically exploitative, or is likely to be hazardous to, or interfere with, the child's education, or to be harmful to the child's health, or physical, mental, spiritual, moral, or social development.

Accordingly, Oxford Spires Scaffolding Ltd will not knowingly use unlawful child labour or forced labour in any of the services or products it provides, nor will it accept services and/or products from suppliers that employ or utilise child labour or forced labour.

Human trafficking and slavery are crimes under UK and international law. These crimes exist in countries throughout the world. This policy statement defines Oxford Spires Scaffolding Ltd commitment to ensuring that human trafficking and slavery does not exist within its own business, but also provides how Oxford Spires Scaffolding Ltd will make efforts to eradicate the same from other businesses in its supply chain.

Our recruitment process for employees include face to face communications with any potential candidates. We also confirm identities by checking originals of relevant documents.

We expect our supplier to adhere to our expectations within their own workforce. We therefore expect our suppliers demonstrate the steps they are taking to ensure slavery and human trafficking are not taking place within their business and their own supply chain. Upon request, Suppliers must be able to demonstrate compliance with this Policy to the reasonable satisfaction of Oxford Spires Scaffolding Ltd. Oxford Spires Scaffolding Ltd may perform periodic audits on this Policy and Suppliers are expected to fully co-operate with any such audit.

Oxford Spires Scaffolding Ltd encourage anyone (including employees, sub-contractors, suppliers and clients) to report any issues and concerns regarding slavery and human trafficking to the Karl Naylor, Director for prevention of Slavery and Human trafficking.

Signed:



**Karl Naylor**  
Director responsible for prevention of Slavery and Human Trafficking

Dated: 31<sup>st</sup> January 2023



## 10.4 Anti-Bribery and Corruption Policy Statement

It is our aim to be a highly respected company in the Scaffolding industry, our success in this is dependent upon how all our employees and subcontractors behave. It is also our policy to comply with UK law.

In the UK and in many other jurisdictions, it is a criminal offence to offer, promise or provide or request or accept - a bribe. In the UK it is also an offence for a commercial organisation to fail to prevent an incident of bribery being committed either by the company or by someone associated with it in order to obtain or retain a business advantage.

This means that bribery and corruption have absolutely no place at Oxford Spires Scaffolding Ltd – and why we operate a strict no tolerance policy towards bribery in all its forms whether directly or through third parties.

This anti-bribery and corruption policy applies to all full and part-time employees, temporary staff and subcontractors who are employed or contracted wherever we work. It also applies to business partners and/or subcontractors who supply services to Oxford Spires Scaffolding Ltd.

We also rely on the services of contractors, sub-contractors and consultants, and here we only want to do business with those who accept the terms of our policy or whose own policy sets standards to match our own.

This policy sets out our anti-bribery and corruption rules and explains what is expected of all Oxford Spires Scaffolding Ltd personnel and associated persons – but we ask you all to do more than follow the rules. We want you to act according to the spirit and the values they represent in whatever you do for Oxford Spires Scaffolding Ltd.

In this way we can achieve our aims together and help drive up standards throughout the industry.

The Bribery Act 2010 (the 'Act') reformed the criminal law providing a new, modern and comprehensive scheme of bribery offences that enable courts and prosecutors to respond more effectively to bribery at home or abroad.

Key elements of the Act are:

- two general criminal offences which cover the offering, promising or giving of an advantage, and requesting, agreeing to receive or accepting of an advantage
- a separate offence of bribery of a foreign public official
- an offence of failure by a commercial organisation to prevent a bribe being paid for or on its behalf (the only defence is if the organisation can show it has adequate procedures in place to prevent bribery).

You can find out more via <https://www.gov.uk/government/publications/bribery-act-2010-guidance>. Because Oxford Spires Scaffolding Ltd is a UK registered and listed company, its subsidiaries, its directors and employees are subject to the Act wherever you are located.

As befits a serious criminal offence, the penalties for engaging in bribery or corruption are severe. Companies can face punitive fines and individuals can be fined and/or imprisoned.

As noted above, in the UK, the legislation incorporates a specific criminal offence for a company of failing to prevent bribery committed on its behalf. We take this responsibility very seriously and this is why we want to be associated only with those whose standards match our own.

A conviction for a bribery or corruption related offence could have severe penalties for our reputation including exclusion from tender lists or being overlooked when bidding;



loss of business; or a decrease in investor confidence, all of which could have severe financial consequences for our business.

Bribery and corruption can occur in many forms; so, understanding them and recognising when they might occur is a key step in guarding against them.

**Bribery** is when a person offers, promises or gives a financial (or other) advantage to another person with the intention of inducing or rewarding that person to act improperly (active bribery), or when a person requests, agrees to receive or accepts a financial (or other) advantage to act improperly (passive bribery).

**Corruption** is any form of illegal, dishonest or bad behavior, especially by people in positions of power.

In our industry, bribery could occur in situations such as tendering, appointing preferred suppliers, contractors and agents and so on. Bribery and corruption can be found at all levels from governments and government officials through to site operatives.

Wherever we work – even where bribery may be seen as the norm - we must be clear that we will not participate in or condone any form of bribery in our dealings whether with the public or private sectors.

Bribes are not always a matter of handing over cash. Gifts, hospitality and entertainment can be bribes as well as offers of employment or gifts to charities if they are intended to influence a business decision.

Transparency and openness are effective weapons against bribery, so be ready to challenge any arrangements that compromise them. Even political contributions, charitable donations and sponsorship arrangements can be used as a subterfuge for bribery.

Our 'no tolerance' of bribery relies on every person at Oxford Spires Scaffolding Ltd and our associated persons always choosing to do the right thing. All this takes is a few simple commitments:

**We will always:**

- Comply with this Anti-Bribery and Corruption Policy
- Comply with company policies on gifts and hospitality, political contributions and charitable donations
- Comply with our requirements concerning any conflicts of interest
- Record **all** activities and transactions accurately, completely and transparently
- Follow appropriate due diligence and risk mitigation procedures before proceeding with any contract or other arrangement
- Seek advice if unsure how to proceed
- Report any suspected or actual breaches of this policy promptly and accurately to Karl Naylor (Director responsible for anti-bribery and corruption)

**We will never:**

- Participate in any form of corrupt behavior
- Use company funds, in the form of payments or gifts and hospitality for any unlawful, unethical or improper purpose
- Authorise, make, tolerate or encourage, or invite or accept, any improper payments to obtain, retain or improve business
- Permit anyone to offer or pay bribes or make facilitation payments on our behalf, or do anything else we would not be permitted to do ourselves
- Offer or give anything of value to a public official (or their representative) to induce or reward them for acting improperly in the course of their public responsibilities
- Offer or accept gifts or hospitality, if we think this might impair objective judgement, improperly influence a decision or create a sense of obligation, or if there's a risk it could be misconstrued or misinterpreted by others.



While high profile cases of bribery, involving large sums of cash and senior executives, are most likely to hit the headlines, bribery can be a risk in many areas of our industry. It might take the form of:

- ❑ Facilitation payments
- ❑ Kickbacks and reciprocal agreements
- ❑ Corrupt third parties (including agents, consultants, contractors or sub-contractors)
- ❑ Excessive gifts and hospitality
- ❑ Inadequate financial controls or record keeping

**Facilitation payments** are usually small payments (or gifts) made to public officials in order to speed up or 'facilitate' actions the officials are already duty-bound to perform. We make no distinction between facilitation payments and bribes, regardless of their size or the local culture.

**Kickbacks and reciprocal agreements** or any other form of 'quid pro quo' are never acceptable. We will not participate in cartels, cover pricing, bid-rigging or any form of collusion. We will neither accept nor make improper payments to obtain new business, retain existing business, or secure any improper advantage.

**Corrupt third parties** can include a range of people acting on our behalf such as agents, consultants, contractors or sub-contractors. We wish to work only with those who are committed to our standards and will undertake due diligence to ensure this. We will engage a third party only when there is a clear business rationale for doing so and with an appropriate contract. We will ensure all payments made to third parties are properly authorised and recorded.

**Excessive gifts and hospitality** can be used to exert improper influence on decision makers. We will only accept gifts and hospitality in accordance with our policy. We will ensure any gifts or hospitality we offer are reasonable in terms of value and frequency. We will never offer or accept gifts or hospitality if we feel it could influence a business decision or give the appearance of doing so.

**Inadequate financial controls or record keeping** can be exploited to hide bribes or corrupt practices. We will ensure we have robust controls in place so that our financial and other records are accurate and complete and never misleading.

If you have a concern or know of or suspect a violation of this policy, we want you to speak up immediately. Please don't ignore it. Speaking up can be a difficult thing to do, so be reassured that all information received will be treated seriously and investigated appropriately.

If you act in good faith, believing your information is accurate, we will protect you even if you are wrong. Doing the right thing will not disadvantage your career or adversely affect your relationships at work. That is why we will not tolerate any form of discrimination or bullying of someone who has spoken up in good faith.

Bribery is a criminal offence which can lead to criminal penalties. But in addition, you have a duty to Oxford Spires Scaffolding Ltd and breaches of this policy will result in prompt disciplinary action, up to and including dismissal/termination of contract.

This policy is designed to help you understand not just the legislation relevant to bribery and corruption but also to provide you with details of further help and training which you may need.

I am committed to this policy and would ask you to show your commitment too by reading it and, if you have any queries or concerns at all, please do not hesitate to contact Karl Naylor Director responsible for anti-bribery and corruption.

**Signed:**



**Karl Naylor (Managing Director)**  
**Director responsible for anti-bribery and corruption**

**Dated: 31<sup>st</sup> January 2023**



## 10.5 General Data Protection Regulation (GDPR) Policy Statement

This became law on 25<sup>th</sup> May 2018. Under the new regulations we must obtain your consent for us to record and store your personal data. We currently hold your details on file under the lawful basis of 'Legitimate Interest', such that the Personal Data is held and processed on the lawful basis that it is in the legitimate business interest of Oxford Spires Scaffolding Limited. This enables us to act as your supplier or customer.

We will continue to hold your personal data securely, both electronically and through paper filing systems, unless you tell us otherwise. Be assured that we will not share your information with anybody outside of our Company.

We only intend to use your data to administer, process and provide the services you are expecting from us.

We will not be changing the ways we use your personal information. If you do not wish us to hold this information, and therefore consent for us to hold this data, you can contact us in writing to our head office address.

The Privacy Notice makes sure that we continue to comply with privacy law and regulations. There are no changes to our terms and conditions, including what we ask of you.

**Signed:**



**Karl Naylor Managing Director  
Director responsible for GDPR**

**Dated: 31<sup>st</sup> January 2023**

## **Appendix A List of relevant Safety Regulations**

This is not an exhaustive list.

The Health and Safety at Work etc. Act 1974.  
The Work at Height Regulations 2005  
The Employers Liability (Compulsory Insurance) Regulations 1969.  
The Safety Representatives and Safety Committees Regulations 1977  
The Health and Safety (safety signs and signals) Regulations 1996.  
The Health and Safety Consultation with Employees Regulations 1996.  
The Management of Safety at Work Regulations 1999.  
The Personal Protective Equipment at Work Regulations 1992.  
The Personal Protective Equipment Workat (Amendment) Regulations 2022.  
The Personal Protective Equipment Regulations 2002.  
The Personal Protective Equipment (Enforcement) Regulations 2018.  
The Manual Handling Operations Regulations 1992.  
The Provision and Use of Work Equipment Regulations 1998.  
The Workplace (Health, Safety and Welfare) Regulations 1992  
The Health & Safety (Display Screen Equipment) Regulations 1992  
The Construction (Design and Management) Regulations 2015.  
The Lifting Operations and Lifting Equipment Regulations 1998  
Reporting of Injuries, Diseases & Dangerous Occurrences Regulations 2013  
The Noise at Work Regulations 2005.  
The Control of Vibration at Work Regulations 2005  
The Electricity at Work Regulations 1989.  
The Control of Substances Hazardous to Health Regulations 2002  
The Control of Asbestos Regulations 2012.  
The Health and Safety (First Aid) Regulations 1981.  
The Health and Safety (Information for Employees) Regulations 1989.  
The Smoke Free Premises Regulations 2006.  
The Regulatory Reform Fire Safety Order 2005.  
Health and Safety Offences Act 2008.

This list of legislation will be reviewed and updated (as required) on an annual basis by the Director responsible for safety and the Safety Consultants.



## Appendix B Scaffold Design Matrix

Additional bespoke Scaffold Designer input is required on any scaffold or element of a scaffold that is not classed as “TG20 Compliant” by use of “TG20 Compliance Sheets” created from the TG20:21 “eGuide” and the detailed guidance criteria contained in the “TG20:21 Operational Guide”.

The following scaffold structures normally require bespoke Scaffolding Designs.

1. Scaffolds for which a “TG20 Compliance Sheet” can’t be produced
2. All shoring scaffolds (Dead, Raking and Flying)
3. Cantilevered scaffolds (if a “TG20 Compliance Sheet” can’t be produced)
4. Truss-out Scaffolds
5. Façade retention
6. Access scaffolds with more than the 2 working lifts
7. Buttressed free-standing scaffolds
8. Temporary roofs and temporary buildings
9. Support scaffolds
10. Complex Loading bays (if a “TG20 Compliance Sheet” can’t be produced)
11. Mobile Towers
12. Temporary ramps and elevated roadways
13. Tube & Fittings Staircases and fire escapes
14. Spectator Terraces and Seating Stands
15. Bridge scaffolds (if a “TG20 Compliance Sheet” can’t be produced)
16. Towers requiring guys or ground anchors
17. Offshore scaffolds
18. Pedestrian footbridges or walkways
19. Slung and Suspended scaffolds
20. Protection fans (if a “TG20 Compliance Sheet” can’t be produced)
21. Pavement gantries
22. Marine scaffolds
23. Boiler scaffolds
24. Power line crossings
25. Lifting gantries and towers
26. Steeple scaffolds
27. Sign board supports
28. Sealing end structures and temporary screens
29. Temporary Storage on Site
30. Masts, Lighting Towers and Transmission Towers
31. Advertising hoardings/banners
32. Rubbish chute

Note 1: The above list is not exhaustive and any system scaffold and/or system component that does not comply with manufacturer’s guidelines (including system scaffolding staircases) as published in handbooks will require a specific design produced by a competent person.

Note 2: The note above (if a “TG20 Compliance Sheet” can’t be produced) indicates that simple versions of this scaffold can be erected without bespoke design if a “TG20 Compliance Sheet” can be produced.