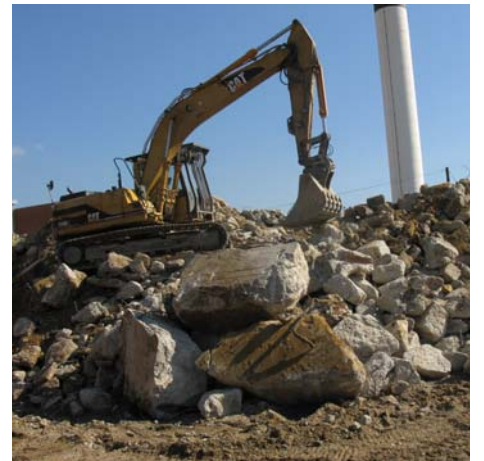




Health and Safety Policy 2010





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INTRODUCTION

The purpose of this document is to provide a framework for the successful implementation of our Policy on Health and Safety Management issues.

This document has been prepared and issued to all Mount Anvil plc employees. It will be discussed with Contractors and issued at the pre-order meeting to ensure that the highest level of commitment is given to the prevention of accidents and ill-health on our sites and places of work.

The document refers to checkpoints relating to the work, plant, equipment and procedures of our Company. If any of the checkpoints cannot be answered satisfactorily, inform your Supervisor or Manager immediately.

Please retain this document and refer to it regularly. Make sure that you are aware of your duties and responsibilities. Health and safety is your responsibility.

When working on site this document should be read in conjunction with the:

- Health and Safety Plan Construction Phase
- Health and Safety Registers
- Site Permit Registers
- Site Induction and Method Statement Register
- COSHH Register
- CITB Publication GE700

A copy of the relevant documents will be held on each site and will be available at the Company's offices.



1. HEALTH AND SAFETY MANAGEMENT STATEMENT

- 1.1 The following statement is produced by Mount Anvil plc in pursuance of the Company's obligations under Section 2(3) of the Health and Safety at Work Act 1974. The Company's commitment to this Health and Safety Policy statement and the objectives outlined in this policy will ensure the Company has in place an effective, practical and achievable means to provide for the health, safety and welfare of employees and others affected by our undertaking and for improving the protection of the environment.
- 1.2. The Board of Directors of Mount Anvil plc accepts its collective responsibility to ensure, so far as is reasonably practicable, the health, safety and welfare of its employees and others affected by its business activities and the protection of the environment. The Board has appointed the Operations Director (Peter Burslem) to assist it by reporting to the Board and implementing Board decisions on health, safety, welfare and environmental issues. **TO THIS END THE COMPANY WILL:**
- 1.3 Comply with all applicable legislation and, where appropriate, relevant codes of practice and industry standards.
- 1.4 Ensure that it employs at all levels a competent and trained workforce through appropriate recruitment, selection, performance assessment, training and, when necessary, re-training.
- 1.5 Systematically identify hazards at the workplace and implement controls to minimise the risk to employees.
- 1.6 Provide an effective system of communication throughout the Company to minimise the risks to employees and encourage co-operation and participation to achieve high standards of health and safety. Issue updated information and consult via regular safety committee meetings. Ensure all employees and sub-contractors are aware that they also have a duty to work safely and co-operate with procedures. Ensure that all are aware that failure to do so makes the employee or sub-contractor personally liable.
- 1.7 Establish and maintain standards, procedures and work instructions that are sufficient to avoid injury to employees and others. Provide appropriate protective equipment, welfare facilities, plant and equipment and maintain them in a safe condition.
- 1.8 Only utilise sub-contractors who demonstrate excellent levels of commitment and compliance with health, safety and environmental standards commensurate with those of the Company.
- 1.9 Through investigation, follow up and analysis of accident and incident reports, strive to eliminate incidents with the potential to result in injury to employees and others, damage to plant and equipment, and harm to the environment.



- 1.10 Have in place audit and review systems to monitor the performance of the Company Health and Safety Management System and provide for on-going improvements.
- 1.11 On at least an annual basis, review and (where necessary) amend the Company policy and bring such alterations to the attention of employees.
- 1.12 Consult with employees at the workplace on issues of health and safety and relay requirements via safe methods of work procedures.
- 1.13 Provide resources, both monetary and physical, in keeping with its obligations to meet the health and safety needs of employees and others affected by the work of the Company e.g. the general public.
- 1.14 Demonstrate a relentless drive and commitment to health and safety. Ensure the Company's process driven policies are supported with a positive and proactive health and safety culture which goes beyond mere legal compliance.
- 1.15 Use the services of Lincsafe (Health & Safety) Limited for advice as required to comply with Regulation 7 of the Management of Health and Safety at Work Regulations 1999 (as amended from time to time).

Handwritten signature of Killian Hurley.

Killian Hurley
Chief Executive
For and on behalf of the Board of Mount Anvil plc

1 July 2010



2. GENERAL INFORMATION

2.1 Responsibilities

2.1.1 The Company will ensure that all employees are correctly trained in accordance with 3.2 (Scope of Training). All employees will ensure that they co-operate and make themselves available for training, which is to be provided to them in the interests of health and safety.

2.2 Scope of Training

2.2.2 Every employee will receive the latest relevant training to ensure they have a thorough understanding of health and safety at work.

2.2.3 The minimum training to be provided to employees will be in accordance with the attached training matrix. Any other trade specific training or training identified from accident trends will also be provided.

2.3 Training Records

2.3.1 Copies of any training certificates will be held in the employee's personnel file. A central register will also be maintained which will detail training attendance by subject and will show training and certificate expiry dates.

2.4 Training Provider

2.4.1 Only competent trainers will provide training. However, competent site management will carry out induction and Tool Box Talks as and when required supplemented with the manufacturer's product specific Tool Box Talks, Work at Height, PPE Gloves/Glasses and Power Tools.

2.5 Provision of Information

2.5.1 Any relevant information on health and safety will be discussed and made available to all employees; this will include the results of any health surveillance or risk assessments. Where an employee makes a request for health and safety information with regard to their work activity, then that information will be provided at the earliest possible time.

2.6 Health and Safety Induction

2.6.1 All employees will receive a health and safety induction. After the induction and until such time as they are deemed competent, employees will be closely monitored by a Supervisor. Particular attention will be paid to workers where English is not their first language - converting inductions and pocket size Do's and Don'ts into 23 different languages.

The health and safety induction will cover the following subjects as a minimum:

- An explanation of the Company Health and Safety Policy
- Location of first aid facilities and identification of first aiders



- Details of the safety procedure applying to their work location
- The accident reporting procedure
- Any specific personal protective equipment requirements
- Any specific risks to their health and safety arising out of their work activity and the precautions to be taken, including the findings of risk assessment
- Emergency / fire safety and evacuation procedures
- Environmental considerations
- Interpreter/language sheets for foreign workers
- Site rules translated into foreign language where necessary

2.7 Drugs and Alcohol

- 2.7.1. Non-prescription drugs and alcohol will not be tolerated at any Mount Anvil work location. Anyone suspected of being under the influence of drugs or alcohol will be required to leave the workplace and may be subject to disciplinary proceedings.
- 2.7.2 The Company recognises that drug dependency is an illness requiring medical treatment. Employees who suffer from such addictions will therefore be given support and assistance provided they are actively following the advice of their doctor and undertaking treatment. Any employee who advises the Company that they are suffering from drug-related problems will be encouraged to seek medical advice and treatment, and will be expected to accept the treatment available and to co-operate fully with professional advisers.
- 2.7.3 Where there is due cause or suspicion that a person may be under the influence of drugs or alcohol or there is a reason to believe that illegal drugs or controlled substances may be affecting any employee's or sub-contractor's safe and productive work performance, including jeopardising the safety of others, the Company will take action in order to detect or confirm the use or presence of such controlled substances. While the Company will endeavour to recognise the sensitivity of employee privacy and confidentiality, such action may include drug / alcohol testing, surveillance, property or personal searches.
- 2.7.4 Employees or sub-contractors who refuse to take a drug or alcohol test or refuse to comply with a request to search personal property on Company premises will be subject to disciplinary action up to and including dismissal for gross misconduct.

2.8 Mobile Phones

- 2.8.1 The use of mobile phones, other than with approved "hands free" fitted equipment is illegal and will not be permitted whilst driving a vehicle on Company business. Mobile phones shall not be used when operating machinery on a construction site.



2.8.2 The use of mobile phones on site is to be restricted to avoid persons becoming distracted or losing concentration, especially if “walking and talking”. If calls are to be made or taken whilst on site, personnel should stop work and move to a safe area for the duration of the call.

2.9 Lone Workers' Policy

2.9.1 The Company is aware that time is spent by its employees working or travelling on their own.

2.9.2 The line manager shall be made aware of dates and locations of meetings to be attended by a lone staff member.

2.9.3 At no time shall personnel visit a workplace on their own without first informing other members of staff and have on their person a mobile phone for emergency use.

2.9.4 Personnel shall at no time enter an area alone which, in their judgement, could prove hazardous.

2.9.5 When travelling, should either a breakdown or vehicle accident occur, as soon as possible contact with the Company shall be made including providing details of location and status.



3. GOALS AND STRATEGIES 2010

Mount Anvil plc is committed to continuous improvement. To achieve this, the following goals and objectives have been set by the Board at its annual review.

3.1 Occupational Health and Safety

- 3.1.1 Provide access to a competent State Registered Nurse. All operatives on site will have access to a site based occupational nurse where there are 225 or more workers on site. The nurse will undertake drug and alcohol testing of all Plant and Traffic personnel and five others at random, weekly.
- 3.1.2 Deliver site occupational health monitoring for HAV, dermatitis, sight, hearing and respiratory conditions.
- 3.1.3 Provide information, guidance and advice to sub-contractors for Tool Box Talks in respect of manual handling, COSHH, respiratory disorders (asthma, smoking, lung cancers) such as silicosis, mesothelioma, how better to reduce exposure or harm to operatives. Bring to the attention of all workers aware of the risks of skin cancer.
- 3.1.4 Facilities will be available for operatives to self test for alcohol and drugs before commencing work on the site to ensure the safety of all those present on site.
- 3.1.5 In the event of an accident or incident where practicable, we will test for drugs and alcohol all those engaged in the activity at the time.

3.2 Safety – Accidents and Incidents

- 3.2.1 Ensure Mount Anvil sites are adequately staffed to allow each to have a manager spending adequate time supervising activities on site to avoid preventable accidents due to a non compliance. The work of sub-contractors is to be actively monitored to ensure they are actually working to the agreed method statements and complying with safety policies.
- 3.2.2 To maintain and improve the quality of site specific inductions for all workers and visitors. Ensure foreign workers where English is not their first language are suitably inducted and have an interpreter present. Site rules in pocket size Do's and Don'ts will be issued at induction. Sub-contractor foreman will be present on site and ensure employees understand hazards and methodology of work in the environment before commencing, reviewing when change occurs.
- 3.2.3 To analyse any recorded safety non-compliance utilizing the Lincsafe reports and implement improvements in procedures and training to achieve reduced non-compliances and year on year improvement.



- 3.2.4 Analyse non-reportable accidents to learn from them and prevent reoccurrence. Share findings with sub-contractors, senior managers and safety advisor to better improve communication, training and the workplace environment. Sub-contractors competent safety advisor is expected to attend and review each incident and adapt their risk and method of work reporting safer methods to the site based team and senior management.
- 3.2.5 Analyse reportable accidents if they occur to reduce our Accident Incident Rate and improve our KPI score:

**85% in 2009
aim for 95% in 2010**

- 3.2.6 Educate the work force to encourage the use of the correct personal protective equipment. This will involve fully understanding which products protect the head, hands and eyes for all site activities. Provide specific Tool Box Talks and one to one guidance by manufacturers involving suppliers (BM Polyco, Centurian Helmets, Bolle, 3M etc).
- 3.2.7 To encourage the reporting of unsafe acts to enable a proactive approach towards zero injury.
- 3.2.8 We will protect workers who 'blow the whistle' about wrongdoing. If any worker believes a danger to the health and safety of any individual exists, they should ring Mount Anvil's Operations Director, Peter Burslem, on 07958 342184 in complete confidence.

3.3 Environmental

- 3.3.1 We will actively seek alternatives to traditional ways of doing things in order to better protect the environment by having:
- Site Waste Management Plan for each site
 - Waste streaming for environmental re-use
- 3.3.2 To ensure full compliance with waste disposal requirements. Segregation and munching of plasterboard to minimise waste contamination.
- 3.3.3 Constantly monitor environmental issues and address as necessary such as fine mist spraying to reduce dust.
- 3.3.4 Reclaim, reuse, and recycle where possible.
- 3.3.5 Assess, monitor and control excessive noise sources by undertaking regular noise assessments.
- 3.3.6 Ensure materials used are acceptable to the environment.
- 3.3.7 Minimise waste by ordering only what is required from local sources.



3.4 Enforcing Authority and Emergency Services

- 3.4.1 To maintain full and effective communication with enforcing authorities for health, safety and environmental standards on site such that no enforcement notices are received from enforcing authorities.
- 3.4.2 Host emergency events on site inviting enforcing authorities and emergency services enabling all to learn from each other. These include emergency evacuation, tower crane rescue and other industry issues.

3.5 Training

- 3.5.1 The Company will not accept the relevance of any training provided to any employee by a previous employer unless a valid training certificate can be produced and the source of any training verified.
- 3.5.2 Achieve compliance with the requirements of the safety and environmental training matrix within the following time scale:

existing staff
95% by end 2010

- 3.5.3 New staff to be trained to the appropriate level within 12 months of commencing employment. Maintain 100% employee and sub-contractor induction into all relevant Mount Anvil systems.
- 3.5.4 All operational employees to receive the latest NVQ training in association with government licensed bodies such as OSAT, Train to Gain, CLW (Construction Learning World).
- 3.5.5 Construction Skills Certification Scheme (CSCS). Provide all site management, surveyors and design and build staff with adequate training to enable them to pass the relevant criteria under the CSCS Certification Scheme. Positively discriminate in favour of sub-contractors who have registered their workforce under other industry recognised training schemes.

3.6 Sub-contractors

- 3.6.1 Coach sub-contractors' safety personnel to drive change internally and improve site standards.
- 3.6.2 Senior Management to meet monthly with sub-contractor leaders to educate, inform and influence the way they work.
- 3.6.3 Ensure sub-contractors put a policy in place and are aware they are duty bound to ensure their workforce are free from drugs and alcohol.
- 3.6.4 Lead and motivate subcontractors to improve and educate all their site operatives in respect of PPE.



- 3.6.5 Work with sub-contractor leaders to ensure they are aware of issues related to Behavioural Safety and Changing Attitudes.
- 3.6.6 Ensure method statements are thoroughly checked and work is properly planned and sequenced and not deviated from therefore eradicating improvisation on site.
- 3.6.7 Evaluate all plant and personnel exposures to vibration ensuring readings are below HSE guidelines.
- 3.6.8 Understand and confirm to all sub-contractors that excellent health and safety will always save time and money. Positively discriminate in favour of those who can demonstrate excellent levels of health and safety compliance.
- 3.6.9 All scaffolding companies to be registered with NASC (National Access and Scaffolding Confederation).
- 3.6.10 Ensure site specific method statements are available and discussed at the pre order meeting and read by sub-contractor operatives at their induction. Site specific method statements at induction and reviewed at place of work before work commences.
- 3.6.11 Trade method statements to be reviewed at regular intervals with operatives and displayed at specific locations where work is being undertaken.

3.7 Head Office

- 3.7.1 Lincsafe to visit the Company's Head Office bi-annually to ensure it is legally compliant with health and safety workplace regulations including fire, first aid, workstation ergonomics and that occupational health issues are satisfactory.

3.8 Design

- 3.8.1 Ensure CDM risk assessments are fully considered, positively vetted and documented before drawings are issued for construction. Adhere to CDM Regulations 2007 (ACOP Reg14 Section 86) by ensuring the CDM Co-ordinator is appointed before significant detailed design begins. Prior to the appointment of any external CDM co-ordination this role will be carried out by Mount Anvil.
- 3.8.2 Ensure Design Consultants are positive and proactive in designing out risk.
- 3.8.3 Encourage designers to reduce the risk of injury from panel products by specifying smaller sizes of board material.
- 3.8.4 Ensure blocks specified are less than 20kg.
- 3.8.5 Use off site production where possible to help with reducing waste and accidents.



3.9 Management / Site Initiatives

- 3.9.1 Eradicate manual handling wherever possible by planning and sequencing work and by providing adequate mechanical lifts where over weight products can not be designed out.
- 3.9.2 Reduce Hand Arm Vibration by ensuring sub-contractors use non hand held vibration tools.
- 3.9.3 Coach site teams ensuring holistic management of sub-contractor and their undertakings.
- 3.9.4 Avoid trailing leads by hard wiring temporary electrics.
- 3.9.5 Use podium steps wherever feasible. Step ladders are only to be use where podium steps are not feasible and an assessment has been undertaken.
- 3.9.6 Eliminate external scaffold ladders by using stairs.
- 3.9.7 Trade method statements to be read and understood by the trade operatives at induction to ensure full understanding of the hazards and are PPE compliant.
- 3.9.8 Ensure blocks are stored under cover to prevent weight gain from rainwater.
- 3.9.9 Housekeeping – workplaces to be kept clean and tidy at all times.
- 3.9.10 Manage the procurement and call off of materials to ensure only the minimum amount of materials are stored on site at any time.

3.10 Foreign Skilled Workers

- 3.10.1 Provide the resources and encourage our directly employed foreign workers to have English lessons if English is not their first language.
- 3.10.2 Hold regular Skilled Workers safety meetings with all our operatives to ensure all their issues are understood.
- 3.10.3 Hold site operative welfare “listen and learn” meetings.
- 3.10.4 Ensure induction sheets, safety notices and tool box talks are translated where necessary.

3.11 Plant

- 3.11.1 Work with the HSE and industry to develop and improve Tower Crane rescue techniques.
- 3.11.2 All manually operated Plant to have vibration monitoring.



- 3.11.3 Tower cranes undergo a six month thorough rough examination by the crane Company. In addition to this, Mount Anvil will carry out an independent crane inspection every six months (staggered with hirer to ensure three monthly inspections).
- 3.11.4 Adhere to Safe Crane Campaign initiatives and liaise with crane groups such as the Battersea Crane Disaster Action Group (BCDAG) and the Safe Crane Campaign to ensure crane issues are given the highest profile, including crane rescue.



4. HEALTH AND SAFETY TRAINING POLICY

- 4.1 Mount Anvil plc has a policy of ensuring its staff and operatives are suitably trained to undertake the tasks they carry out.
- 4.2 The minimum standard for each job title is detailed in the Health and Safety Training Policy Matrix.
- 4.3 Should the minimum standards set be deemed not suitable, then the appropriate Director/Manager will address for the individual job requirements.
- 4.4 Develop and maintain a twelve month training plan to ensure the needs of the business are met and training requirements are resourced adequately.



Appendix

Heath and Safety Training Policy Matrix

	Director	Contract Managers	Project/Site Manager	Site Engineer	Service/Maintenance Managers	Foreman/Assistant Site Manager	Direct Operative	Surveyors	Estimator	Admin Staff	D&B Co-ordinators
3 Day First Aid	✓ As required	✓	✓	✓	✓* As Required	✓	✓ As Required	✓ As required	✓ As required	✓ As required	✓ As required
1 Day Emergency First Aid							✓	✓		✓* As Required	✓
Manual Handling	✓ As required	✓	✓	✓	✓	✓	✓	✓	✓	✓* As Required	✓
VDU Training	✓	✓	✓	✓* As Required	✓	✓		✓	✓	✓	✓
Asbestos/Confined Space	✓ As required	✓	✓	✓	✓	✓	✓	✓		✓	✓
Mobile Plant Categories as required						✓* As required	✓				
Crane Appointed Person						✓ As required					
Work at Heights	✓* As required	✓	✓		✓	✓	✓* As required				
NVQ2							✓				
NVQ3/4		✓ As required	✓ As required			✓ As required		✓			

✓ - Mandatory Course

✓ * As Required – Not mandatory but desirable and may be necessary to ensure roles and responsibilities are fulfilled on site



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