

Health & Safety Policy and Practice

August 2019



HEALTH & SAFETY POLICY STATEMENT

VolkerLaser is a multi-disciplinary construction contractor operating in the United Kingdom. Health and Safety is integrated into our core values which is set in context with all other business objectives, to ensure the health, safety and welfare of all VolkerLaser employees and others who may be affected by the company's activities. This statement of policy, and the organisation and arrangements for its implementation, has been prepared to comply with section 2(3) of the Health & Safety at Work etc. Act 1974. Further arrangements for its implementation are detailed within VolkerLaser company processes, procedures, and Site Management Plans.

The company will treat the need to prevent accidents, injuries and ill health to employees and others affected by its work as a top priority. In doing so, it will ensure priority is given to the assessment of risk, health and safety planning, and to provide proper information, instruction, training and supervision in accordance with the relevant statutory provisions and industry best practice.

The Senior Management of VolkerLaser is committed to the review and improvement of health and safety performance, including implementing new guidelines and requirements in its endeavour to achieve industry best practice. VolkerLaser will establish and review quantifiable objectives and targets according to the nature of its activities, business and other legal requirements, to ensure continual improvement in both its safety management systems and its performance.

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

To implement this policy, VolkerLaser will:

- Ensure senior management are visible and active in promoting safe and healthy working conditions
- Enhance performance based upon behavioural programmes, observations and coaching
- Make sure that the causes of accidents and ill health that may arise from its activities are, wherever possible, identified, understood, and either prevented or controlled
- Undertake risk assessments and effectively manage residual risks through adequate control measures
- Manage health problems through early problem recognition and monitoring
- Manage return to work after sickness certification and, wherever possible, support rehabilitation after prolonged illness
- Provide adequate supervision as required
- Provide employees with training, information, instruction and services to help them take personal responsibility for maintaining and improving their own safety and health.
- Maintain performance standards that enable work activities to be carried out safely and in compliance with health and safety legislation and ISO 45001 2018

It is a fundamental company belief that the creation of a safe workforce is achieved through clear and effective communication at all levels of the organisation, in an environment where everyone contributes to safe systems of work through active and open participation.

All employees and others working for VolkerLaser are required to comply with this policy. In particular, by co-operating and carrying out activities safely, and in such a manner that does not intentionally or recklessly interfere with, or misuse, anything provided in the interest of health, safety or welfare. It is the responsibility of VolkerLaser management and supervisory staff to ensure that this policy and its arrangements are implemented.

This policy will be reviewed annually and revised as often as may be deemed appropriate by VolkerLaser, and then brought to the attention of all employees. It is accessible to interested parties upon request. We support our clients, relevant trade associations, accreditation bodies and other stakeholders to achieve their health and safety goals and objectives.

Mike Weaver

Managing Director

August 2019

CONTENTS

| | | |
|------|--|----|
| 1. | PURPOSE | 4 |
| 2. | SCOPE | 4 |
| 3. | ABBREVIATIONS & DEFINITION OF TERMS | 4 |
| 4. | ORGANISATION AND ARRANGEMENTS | 4 |
| 4.1 | ARRANGEMENTS FOR IMPLEMENTATION OF POLICY | 4 |
| 4.2 | RESPONSIBILITY FOR HEALTH & SAFETY | 5 |
| 4.3 | ORGANISATION AND STRUCTURE | 10 |
| 4.4 | STRUCTURE OF SAFETY MANAGEMENT SYSTEM | 11 |
| 4.5 | MONITORING AND REVIEW | 12 |
| 4.6 | TRAINING | 12 |
| 4.7 | CLASSIFICATION OF WORKFORCE..... | 12 |
| 5. | RISK ASSESSMENT AND HEALTH & SAFETY PLANNING | 13 |
| 5.1 | INTRODUCTION | 13 |
| 5.2 | THE COMPANY APPROACH | 13 |
| 5.3 | THE HEALTH & SAFETY PLANNING MEETING | 14 |
| 5.4 | MANAGEMENT OF SUBCONTRACTORS | 14 |
| 6. | COMPANY HEALTH & SAFETY PROCEDURES | 15 |
| 6.1 | DEFINITION | 15 |
| 6.2 | SITE RULES - HEALTH & SAFETY | 16 |
| 6.3 | ACCIDENT AND INCIDENT REPORTING..... | 17 |
| 6.4 | DRUGS AND ALCOHOL POLICY | 17 |
| 6.5 | CONTROL OF SUBSTANCES HAZARDOUS TO HEALTH (COSHH) REGULATIONS..... | 21 |
| 6.6 | CONSTRUCTION (DESIGN AND MANAGEMENT) REGULATIONS (CDM) 2015 | 21 |
| 6.7 | CONSULTATION WITH EMPLOYEES | 21 |
| 6.8 | EMERGENCY PROCEDURES | 22 |
| 6.9 | FIRE PRECAUTIONS | 22 |
| 6.10 | FIRST AID | 22 |
| 6.11 | GROSS MISCONDUCT | 22 |
| 6.12 | HEALTH..... | 23 |
| 6.13 | LONE WORKING | 23 |
| 6.14 | MANUAL HANDLING..... | 23 |
| 6.15 | NO-SMOKING POLICY | 24 |
| 6.16 | NOTICES AND WRITTEN INSTRUCTIONS | 24 |
| 6.17 | OFFICE / WORK PLACE SAFETY | 24 |
| 6.18 | PERMITS TO WORK | 25 |
| 6.19 | PERSONAL PROTECTIVE EQUIPMENT (PPE) | 25 |
| 6.20 | PLANT & WORK EQUIPMENT | 26 |
| 6.21 | VIBRATION | 26 |
| 6.22 | VEHICLES & CARRIAGE OF DANGEROUS GOODS VEHICLES | 27 |
| 6.23 | CARRIAGE OF DANGEROUS GOODS..... | 28 |
| 6.24 | WELFARE | 28 |
| 6.25 | WORKING AT HEIGHTS..... | 28 |
| 6.26 | WORKING CONDITIONS / ENVIRONMENT | 28 |
| 6.27 | WORK IN RAIL ENVIRONMENT | 29 |
| 6.28 | YOUNG PERSONS | 29 |
| 6.29 | LIFTING OPERATIONS | 29 |
| 6.30 | TEMPORARY WORKS..... | 30 |
| 6.31 | WORKING CLOSE TO THE PUBLIC | 30 |
| 6.32 | WORKING CLOSE TO ASBESTOS..... | 30 |
| 6.33 | WORKING CLOSE TO LEAD CONTAINING MATERIALS | 30 |
| 6.34 | SPECIALIST WORK ACTIVITIES | 30 |
| 7. | IMS AUTHORISATION | 31 |

1. PURPOSE

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

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

2. SCOPE

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

Formal amendment to this document is the responsibility of the Senior HSEQ Manager with the approval of the VolkerLaser board of directors. This document will be brought to the notice of all employees. Staff appointed responsible for the management and implementation of health and safety requirements will ensure that at least one copy is available on each site. (Paper or Electronic version)

This document is developed and reviewed in conjunction with relevant health and safety regulation as outlined in the company's Legislation Compliance Register (H03-01 *ENDS Compliance Register*).

3. ABBREVIATIONS & DEFINITION OF TERMS

COSHH - Control of Substances Hazardous to Health

CR - Corporate Responsibility

MD - Managing Director

4. ORGANISATION AND ARRANGEMENTS

4.1 Arrangements for Implementation of Policy

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

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

4. ORGANISATION AND ARRANGEMENTS (CONTINUED)

4.1 Arrangements for Implementation of Policy (Continued)

- Reporting and investigating accidents, disseminating findings and where appropriate revising arrangements and procedures
- Ensuring adequate and appropriate levels of welfare and protective equipment is provided
- Ensuring the occupational health and mental well-being of employees
- Carrying out appropriate health surveillance
- Monitoring and reviewing performance

4.2 Responsibility for Health & Safety

ISO 45001 2018 uses the term 'top management' to identify a number of key responsibilities with regard to health and safety management. The roles that fall within VolkerLaser's 'top management' for Health and Safety are shown below.

- Managing Director
- Senior management team (Directors)
- Senior Health, Safety, Environment, Quality Manager (HSEQ)
- VolkerWessels UK (VW UK) Corporate Responsibility Director (CR)

'Top Management' Responsibilities for Health and Safety Include:

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

Different roles have varying levels of authority with regard to our Safety Management System, and are explained as follows:

Managing Director (MD)

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

Directors

Are responsible to the Managing Director for:

- The safe delivery of all VolkerLaser contracts
- Overseeing and supporting the effective implementation of the SMS and behavioural improvement programmes
- Liaising with clients to ensure their satisfaction
- Training, supporting and mentoring their direct staff to develop their knowledge / application of the SMS
- Accept their individual role in providing good Health and Safety leadership and encouraging safe behaviour and engage in active participation of workers in improving Health & Safety
- Direct management under their control to implement the Health & Safety Policy at all times

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| Approved for IMS: | IMS Manager | Document owner: | Senior HSEQ Manager | Workspace file: | n/a | Page 5 of 31 |
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4. ORGANISATION AND ARRANGEMENTS (CONTINUED)**4.2 Responsibility for Health & Safety (Continued)**

- Liaise with the company's appointed Health & Safety Management to ensure proper communication exists at all levels
- Ensure adequate planning is undertaken to provide appropriate resources, training and safe systems of working
- Ensure the provision of this policy is kept under review having regard to changes in legislation, best practice and the company's business
- Treat the health & safety of persons under their control as a matter of the highest importance

SMS Management Representative

The VolkerLaser Senior HSEQ Manager is the appointed Management Representative for health and safety, and has the authority to take any action necessary to ensure that health and safety is maintained. Formal amendment to the SMS is the responsibility of the Management Representative. Reporting to the VolkerLaser Managing Director, it is the responsibility of the Senior HSEQ Manager to:

- Ensure the effective use of the CR department and its' resources
- Ensure the advisory service provided by the department is an effective and practical interpretation of applicable regulatory and company requirements
- To assist the Managing Director in setting realistic goals for the continual improvement in risk management and reduction of accident / incident rates
- Develop the SMS to achieve the goals set
- Ensure the goals set are periodically monitored to agreed standards
- Ensure the company is audited against the standards detailed in the SMS

Health & Safety Management - HSEQS Team

The dedicated HSEQ Manager will be directly employed by VolkerLaser Ltd.

In addition to this, VW UK Corporate Responsibility provides strategic direction, performance management, occupational health, IMS management, technical services and compliance support to all of the VW UK companies.

Senior Health, Safety, Environmental, Quality (HSEQ) Manager

Reporting to the Managing Director and CR Director the Senior HSEQ Manager is responsible for ensuring effective implementation of the SMS. As a technical specialist provide support, guidance and training. The responsibilities include:

- Play a key part in improving the health and maintaining the safety of employees, people working on our behalf, and any other parties affected by our activities
- Inform, guide and support the workforce in creating workplaces with a positive health and safety culture
- Visit sites regularly and monitor performance in relation to the policy and procedures
- Discuss and plan the safe implementation of future works
- Carry out auditing in accordance with company procedure Q03 *Audit* to ensure compliance with existing requirements and identify any areas for improvement
- Represent VolkerLaser in communications with the Health and Safety Executive, and other external enforcing authorities or organisations
- Ensure that reports are compiled where necessary to enable corrective action to be implemented by site management
- Ensure thorough investigation is made and appropriate records are compiled where accidents and incidents occur, and make recommendations to prevent recurrence
- Advise health and safety training requirements
- Ensure that VolkerLaser health & safety management documentation is appropriate and maintained to reflect any changes in legislation and company requirements

4. ORGANISATION AND ARRANGEMENTS (CONTINUED)**4.2 Responsibility for Health & Safety (Continued)**

- Maintain their competence through continual professional development
- Adhere to the professional code of conduct as set through membership of the Institute of Occupational Safety and Health (IOSH) and / or the International Institute of Risk and Safety Management (IIRSM)
- Identify opportunities for improvement

Corporate Responsibility Director (CR)

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

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

Integrated Management Systems (IMS) Managers

Reporting to the CR Director is responsible for:

- Establishing the SMS requirements in line with ISO 45001 2018
- Ensuring legal, sector specific, and other requirements are integrated within the SMS
- The co-ordination of activities related to the implementation, development and maintenance of the SMS
- Control, publishing and maintenance of the IMS within Workspace (our business management system)

Rail Standards & Compliance Manager

The VolkerFitzpatrick Rail Standards & Compliance Manager fulfils this role and is responsible for:

- Establishing the rail-specific SMS requirements in line with ISO 45001 2018
- Working in close collaboration with the IMS Manager to ensure legal, sector specific, and other requirements are integrated within the SMS
- Support VolkerLaser in ensuring Rail compliance and through development and review of the companies RISQS (Rail Industry Supplier Qualification Scheme) Manual
- Provide support for the Sentinel Scheme Rail requirements

4. ORGANISATION AND ARRANGEMENTS (CONTINUED)

4.2 Responsibility for Health & Safety (Continued)

Operations Manager / Site Manager / Plant Manager / Yard Manager/ Site Supervision

It is the responsibility of contract / site management to:

- Be familiar with and observe all relevant statutory provisions applicable to construction and related industries
- Implement the company's procedures for dealing with subcontractors and ensure proper co-operation and co-ordination takes place between the various parties who may share the workplace / site
- Provide an overall health and safety plan for each project, making an adequate assessment of the risks involved, and ensuring that safe systems of work and method statements are produced, followed and reviewed
- Ensure activity and / or substance specific assessments under the Control of Substances Hazardous to Health (COSHH) Regulations are made and communicated to those at risk including the requirement of face fit testing when using face masks
- Ensure employees, selfemployed, temporarily employed, trainees and non-employed persons have received adequate training and information about the activity they are required to undertake, particularly by ensuring induction is provided for those attending a location for the first time
- Ensure employees are aware of the company's policy for health and safety at work and that they have understood its requirements
- Liaise with others as applicable; support initiatives for health and safety representation
- Ensure suitable protective equipment is provided, maintained and used
- Report all accidents and incidents, near misses to the appointed Health & Safety Manager, carry out investigations, make recommendations to prevent recurrence and ensure this information is effectively communicated
- Arrange HSEQ meetings, where applicable, with the appointed Health & Safety Manager
- Ensure that weekly safety inspections are carried out, including maintenance of appropriate inspection records
- Ensure proper procedures are made for the safe evacuation of workplaces and that they are under the control of trained and competent people
- Implement the advice given by the company's appointed Health & Safety Manager
- Attend health and safety training arranged by the company

Site Foremen / Yardman

It is the responsibility of foremen and Yardmen to:

- Ensure operatives are suitable, competent, trained and authorised to carry out the work, particularly where mechanical plant and equipment is involved
- Provide effective front line supervision on site and ensure that operatives are instructed in the detail of safe systems of work as it applies to particular construction operations
- Encourage the workforce to work in a safe and tidy manner, paying particular attention to the wearing of personal protective equipment and, where necessary, disciplining offenders
- Be familiar with and observe all relevant statutory provisions applicable on site and take immediate action in respect of advice given by the company's appointed Health & Safety Manager
- Co-operate and liaise where appropriate with other contractors' site Supervisors
- Ensure suitable protective equipment is provided, maintained and used
- Report all accidents and incidents, near misses to the appointed Line Manager or Health & Safety Manager
- Attend health and safety training arranged by the company

4. ORGANISATION AND ARRANGEMENTS (CONTINUED)**4.2 Responsibility for Health & Safety (Continued)****All Other Employees, Subcontractors and any Other Persons Working on our Behalf**

It is their responsibility to:

- Be familiar with the VolkerLaser Health & Safety Policy and co-operate with Management / Supervision in its implementation
- Understand the parts of the Health & Safety Policy applicable to them and take reasonable care for the health and safety of themselves and others
- Follow the instructions given regarding safe working in general and safe methods of work for particular tasks
- Contribute to the safety culture, be aware of relevant site safety rules and abide by requirements Use and not abuse the protective equipment and measures provided in the interests of health and safety
- Keep equipment in good order, use the correct equipment for the task, and report any defects in plant and equipment or any shortcoming in safe systems of work to their Manager / Supervisor
- Report all accidents and incidents, near misses to the appointed Line Manager or Health & Safety Manager,
- Attend health and safety training arranged by the company

Contractors

- Contribute to the safety culture, be aware of relevant site safety rules and abide by requirements
- Use and not abuse the protective equipment and measures provided in the interests of health and safety
- Ensure all contract workers are fully inducted in addition to VolkerLaser induction
- To provide VolkerLaser with all timely and relevant information following accident / incident events
- Fully integrate their own safe systems of work in addition to the requirements of VolkerLaser Ltd and including attendance of their Health and Safety support
- Attend planned pre start of contact meetings where required
- Provide suitable levels of Supervision during the construction phase
- Ensure access at all times to competent health and safety advice
- Attend planned performance reviews including health and safety

4.3 Organisation and Structure

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graph TD; VWS[VW UK SHARED SERVICES] --- VMD[VOLKERLASER MANAGING DIRECTOR]; VMD --- VUCR[VW UK CR DIRECTOR]; VMD --- VOD[VOLKERLASER OPERATIONS DIRECTOR]; VMD --- SHSEQ[SENIOR HSEQ MANAGER / HSEQ MANAGER / ADVISOR]; VUCR -.- SHSEQ; VOD --- OD[OPERATIONAL DIVISIONS & ADMINISTRATIVE OFFICES]; SHSEQ -.- OD; OD --- DMFO[DIRECTORS / MANAGERS / FOREMEN / OFFICE STAFF]; DMFO --- OP[OPERATIVES]; DMFO --- SC[SUB-CONTRACTORS];
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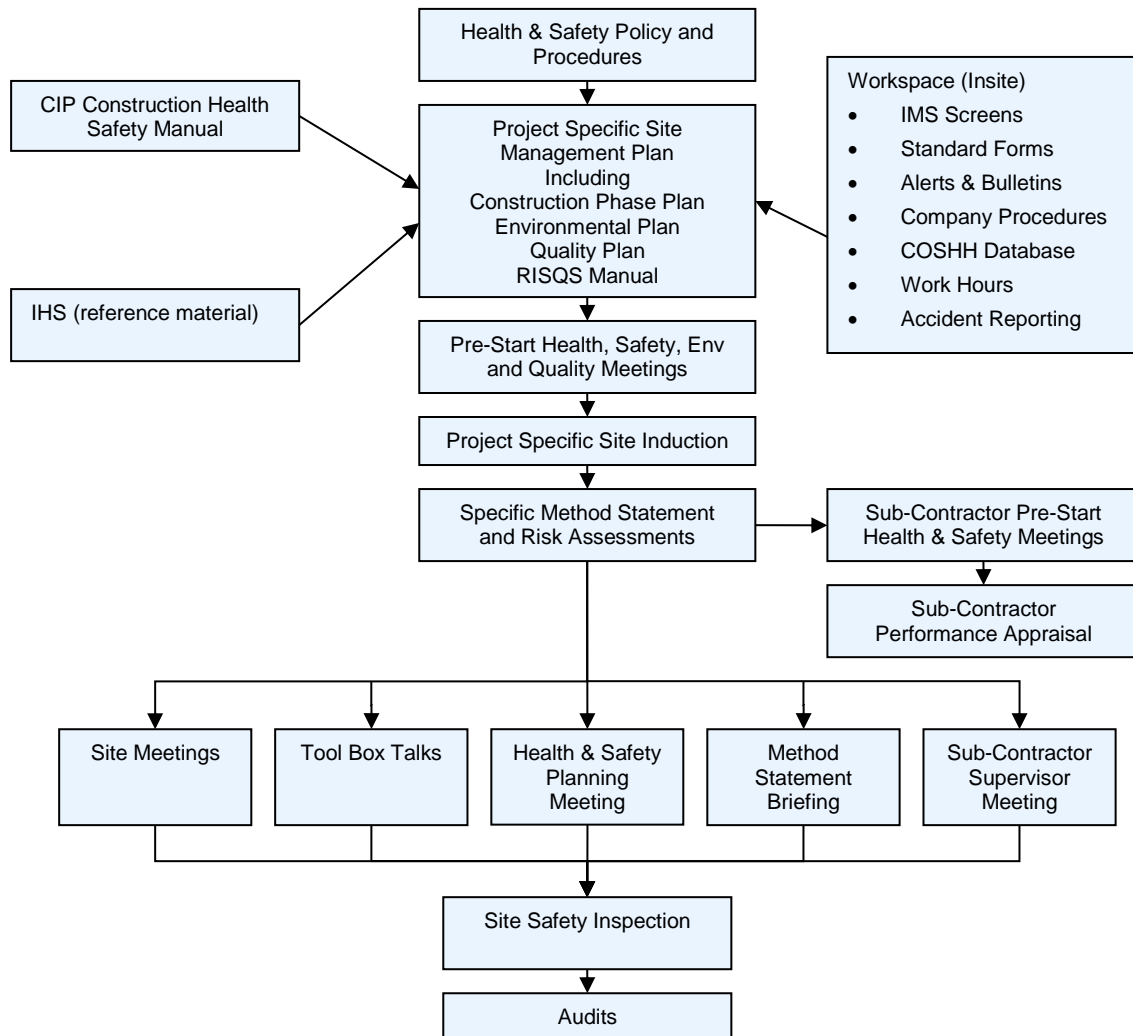
4. ORGANISATION AND ARRANGEMENTS (CONTINUED)

4.4 Structure of Safety Management System

The company has a Safety Management System (SMS) to support the implementation of the policy and is stored on 'Workspace', our business system which provides access to:

- Policies and procedures
- Site documentation
- Health and safety (HSE) forms
- Alerts and bulletins
- Health and safety objectives and targets
- RIDDOR performance
- Best practice guidance
- Links to external web-based health and safety information
- Specific tools e.g. COSHH

The System is Shown in Outline Below:



4. ORGANISATION AND ARRANGEMENTS (CONTINUED)

4.5 Monitoring and Review

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

- Internal and third party inspection, audit and monitoring of our activities
- Safety performance monitoring (hazards, near misses, accidents)
- Comparison with current, new and proposed legal requirements or best practice
- Meetings carried out with Directors, Senior Managers and Health & Safety Management
- Meeting with our clients, supply chain and trade associations

4.6 Training

Appropriate training will be identified and provided to all levels of VolkerLaser managerial and operational employees. Training may comprise safety induction, toolbox talks, method statement briefings, in-house training courses and specialist external training courses.

Training requirements are assessed both at commencement for new employees, and on an on-going basis for existing employees. The capabilities and expertise of our Management / Supervisory employees is reviewed at safety management meetings and through Development and Performance Reviews (DPR). Site based operational employees' training levels are checked as part of the planning process and where required additional levels of training delivered. Site based training includes a site induction delivered by the Supervisor or Site Manager. Toolbox talks will also be delivered based on the projects site risks, encouraging two-way discussion and active participation.

All site personnel will receive a formal, signed off, induction talk given by a member of the site management team which will include both general and site-specific requirements.

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

Training records are maintained by the VW UK training department (including the CR Department).

Plant and equipment operators are required to provide evidence of training and competency e.g. CPCS card. Our Commercial Vehicle Drivers are required to obtain Driver CPC qualifications.

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

4.7 Classification of Workforce

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

1. Office and administration posts;
2. Site management / general duty construction; and
3. Safety critical.

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

5. RISK ASSESSMENT AND HEALTH & SAFETY PLANNING

5.1 Introduction

Risk assessment is the responsibility of the relevant Manager for sites, offices and operational locations with the assistance of the Health & Safety Manager following the information provided in H02 *Risk Assessment and Method Statements*.

The principles of prevention to be applied are as follows:

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

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

5.2 The Company Approach

VolkerLaser has an established risk assessment procedure outlining its approach towards identifying the hazards faced by its activities and the associated levels of risk. ALL work activities are assessed using the standard risk assessment template. For significant projects a risk assessment chart will be developed outlining the hazards and significant risks associated with construction, along with references to existing health and safety guidance. This chart and its contents do not constitute risk assessments. Its aim is to aid the identification of risks requiring detailed assessment and will be developed at the planning phase.

All significant projects will facilitate an HSEQ planning meeting to ensure all Health and Safety risks are identified and suitable controls established, prior to the commencement of the site activities. The arrangements to safely execute the works are examined and planned. All work activities will be assessed and documented. Preventive and protective measures must be determined, recorded and communicated to all relevant employees, and their on-going effectiveness monitored and reviewed.

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

Residual risk following the implementation of control measures to reduce risk to As Low As Reasonably Practicable (ALARP) shall be reviewed as the works are executed.

Further safe systems of work will be implemented during the construction phase, including permits to work, all based on the findings of the risk assessment process.

During the planning phase the type of assessment required will be identified and developed accordingly where required support from the HSEQ Department or other specialist advice / support will be provided.

Risk Assessments requiring additional levels of input to develop may include, but not limited to the following:

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

5. RISK ASSESSMENT AND HEALTH & SAFETY PLANNING (CONTINUED)**5.2 The Company Approach (Continued)**

- Manual handling
- Personal Protective Equipment
- Display Screen Equipment
- Noise at work
- COSHH
- Asbestos
- Lead
- Hand Arm Vibration
- Whole Body Vibration
- Fatigue
- Work at height
- Fire
- Young persons
- Lone workers
- Plant assessments
- DSEAR
- Working with Gas appliances and Equipment

5.3 The Health & Safety Planning Meeting

CDM Notifiable Projects (30 working days and have more than 20 workers working simultaneously at any point in the project or exceed 500 person days) and where VL act as the Principal Contractor:

Prior to construction commencing an HSEQ planning meeting shall be held to discuss the formulation of the project *Construction Phase Plan* as part of an integrated *Site Management Plan* (SMP). This meeting will be attended by other members of the project management team including the Contracts Manager, Health & Safety Manager and others as appropriate. The Construction Phase Plan will be developed to fully incorporate the details as outlined in the preconstruction information and further outline the significant Health and Safety risks and the management controls to be implemented during the construction phase.

The planning meeting will develop a risk assessment chart to help determine those significant risks. Risk Assessments will be further developed to outline the type of hazard, the levels of risk, categorised (H) high, (M) medium, or (L) low and the likely control measures to be implemented. The findings of the risk assessment will be thoroughly outlined in subsequent developed method statements or safe systems of work. Specific assessments shall also be considered at this stage to address COSHH, noise, P.P.E, manual handling etc. and shall also be included in the respective method statement or compiled and maintained separately.

For all long term projects site based safety meetings will be facilitated by the site management team outlining planning and monitoring arrangements including current performance levels.

Non Notifiable Projects: HSEQ Project planning meetings will be held where the levels of risk identified are significant and where additional resources are required during the construction phase to manage the risks.

5.4 Management of Subcontractors

All tender enquiries to subcontractors indicate VolkerLaser's safety requirements. Prior to appointment it shall be emphasised to the relevant representative or Manager of the subcontractor that VolkerLaser expects full co-operation from them in achieving the required health and safety standards as outlined in this Policy and site specific needs.

Contractor Approval

As part of the process of procuring subcontractors their health and safety performance will be checked in addition to their arrangements for managing health and safety within their organisation.

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5. RISK ASSESSMENT AND HEALTH & SAFETY PLANNING (CONTINUED)

5.4 Management of Subcontractors (Continued)

Audits, accident and performance information, records and references will be obtained to ensure competent contractors are employed and sufficiently resourced.

Only when the contractor organisation has been approved will they be authorised to commence operational activities.

Pre-start Meeting

Prior to commencing work, subcontractors will attend a subcontract pre-start health & safety meeting (recorded using HSE-03 *Subcontractor Pre-start Health & Safety Meeting Agenda*) to plan and develop safe systems of work for the identified scope of works, this will be facilitated by the site project manager or other nominated person. Supervisory requirements will be checked at this stage for the project.

Approval of Method Statements

Prior to any work activities being undertaken the Contractor's method statements (including Risk Assessments) will be thoroughly checked and approved by the Site Manager. This will be recorded on form H02-04 *Risk Assessment and Method Statement Evaluation*. The Contractor will also be expected to communicate out the contents of their own safe working methods and recorded. (Use form H02-02 *Qualitative Risk Assessment and Method Statement Template* and H02-03 *Quantitative Risk Assessment and Method Statement Template* where applicable). Copies must be obtained.

Induction

It is a mandatory requirement that all contractor workers attend a VolkerLaser site induction. It will also be an expectation that the Contractor delivers their own induction thereafter.

Project Communication

At regular intervals the Contract / Project Manager will convene meetings with the site representatives of all subcontractors performance. These meetings will provide an opportunity for subcontractors to make an input into the safe management of the site.

Performance Review

For CDM Notifiable Projects and where Contractors are used, each contractor will participate in a performance review meeting including Health and Safety (Attitude, Performance and Documentation). Scoring will be based on a scoring system of 1 to 10 where 1 is totally unacceptable.

Performance ratings will be undertaken on other Contractors where identified.

Contractor Supervision

VolkerLaser will expect work to be carried out in a professional manner at all times. The major responsibility for monitoring Health and Safety lies with SUPERVISION and will expect a high degree of co-operation from all Supervisors. Form HSE-17 *Site Supervisor Instructions* will be developed by each Contractor Supervisor during induction. Furthermore Subcontractor Supervisor's meetings will be undertaken and recorded using form HSE-05 *Subcontractors Supervisor Meeting Agenda*.

6. COMPANY HEALTH & SAFETY PROCEDURES

6.1 Definition

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

Failure to comply with the following rules will render employees liable to disciplinary action. It should also be borne in mind that a breach of health and safety legislation is a criminal offence and action taken by the enforcing authority (Health and Safety Executive) may result in the issue of an enforcement notice and potential resulting penalties including fines and / or imprisonment.

6. COMPANY HEALTH & SAFETY PROCEDURES (CONTINUED)**6.1 Definition (Continued)**

Everyone is responsible for safety including Directors, Managers, Site and Office Staff, fellow employees, workshop employees and yourself. All persons have a responsibility to contribute towards making their place of employment a safe place to work. Safety measures are introduced to control safety and health risks to everyone at the location, including employees, subcontractors, visitors, members of the public and anyone else who could be affected by the work.

6.2 Site Rules - Health & Safety

VolkerLaser's site rules comprise the following as a minimum, and are applicable to all contracts:

- All persons having any business on site must attend an induction and understand a copy of the site rules
- All persons must report to the site office and sign in before entering the site, and sign out on leaving the site
- All persons on site must wear a safety helmet, protective footwear and high visibility clothing at all times (the site offices and welfare facilities are excluded from this rule)
- Trainers will not be permitted at any time. Visitors shall be made aware regarding protective footwear, but may be exempt if agreed and accompanied by site management. No Rigger boots are permitted
- The correct task specific personal protective equipment must be worn at all times, e.g. gloves, goggles, masks, ear defenders, etc, and also in accordance with any local or site rules. Face fit testing of RPE to be undertaken to all employees identified and required to wear RPE
- Unauthorised personnel must not alter scaffolding or any other temporary facilities, this is a zero tolerance issue
- No one is to operate vehicles, plant or machinery, including fitting abrasive wheels and erecting or dismantling scaffolding unless they are appropriately trained or suitably qualified, e.g. CPCS or similar and authorised in writing by VolkerLaser. This is a VolkerLaser zero tolerance issue, unauthorised persons operating plant will be removed from site
- Excavator operatives who are found to have incorrectly fitted a bucket onto the quick hitch system and not ensured that all associated safety devices are correctly fitted will be removed from site. This is a zero tolerance issue
- Failure to wear a suitable harness and lanyard connected to a safe attachment point is a zero tolerance issue
- The use of hand held mobile phones while operating plant / vehicles whilst on site is prohibited, except if parked up and the engine switched off
- Defective vehicles (including light commercial & HGV), plant or machinery must not be used at any time and the defect(s) should be brought to the attention of the site management immediately
- No person under the influence of drugs or alcohol will be permitted to remain on site
- Welfare facilities are to be kept clean and tidy at all times
- Warning signs must be obeyed at all times
- All hazards, near misses, accidents and dangerous occurrences must be reported to the site office, and all injuries entered in the accident book
- Operatives using any equipment producing a naked flame or sparks must have within arm's reach a suitable fire extinguisher. The operative must also be in the possession of a Hot Works Permit
- A Permit to Work is required for any person entering a confined space
- A Permit to Dig is required every time before breaking the ground surface
- Only certificated and authorised personnel will be allowed to sling loads or direct cranes
- Drivers of all excavators and reversing vehicles must have good all round visibility or be supervised by a banksman
- It is incumbent upon all operatives to work in a safe manner and not to endanger themselves or other persons by their actions
- Portable electric tools and equipment shall only operate at 110 volt power or lower, and wherever possible use RCD protection
- No radios on site

6. COMPANY HEALTH & SAFETY PROCEDURES (CONTINUED)

6.2 Site Rules - Health & Safety (Continued)

- All materials used on site which have a hazard symbol on the container / bag, must have a COSHH Assessment sheet, which should form part of the Method Statement. We encourage the use of, where possible, materials that are non-hazardous and friendly to the environment
- All pedestrian and vehicle control signs must be complied with
- No persons are permitted to be underneath any unprotected overhead activities
- No work is to be carried out on the following activities unless a written permit / authorisation has been issued (**See section 6.18 for information**)

6.3 Accident and Incident Reporting

Following ANY accident or incident the procedures outlined in the safety Accident / Incident action guide (H07-04 *Actions following Safety or Environmental Incident*) must be implemented by the site management team.

Medical treatment should be sought for injuries sustained at work, no matter how slight and an appropriate record must be made in the accident book.

All accidents and incidents, diseases, dangerous occurrences and damage to property belonging to VolkerLaser or others, shall be reported to the site management and the appointed Health & Safety Manager as soon as it is practicable, and no greater than 30 minutes (H07-04 *Actions following Safety or Environmental Incident*) so that they may be thoroughly investigated to prevent a recurrence.

All injuries, diseases or dangerous occurrences suspected of being covered by RIDDOR 2013 must be notified to the relevant enforcing authority, by the responsible person.

A local (site team) investigation shall be held into all accidents and incidents, where a formal investigation is not required. Refer to HSE-31 *Accident & Incident Report* for guidance.

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

The CR Director/ Safety Manager in certain situations may request a formal investigation to be carried out for some accidents and incidents that would ordinarily be treated as local investigation to determine the root causations and corrective actions, leading to potential longer term preventive actions. Formal investigations (RIDDOR or other designated) will be completed by the Senior HSEQ Manager with assistance from the project management team. The investigation will be recorded using H07-02 *Accident Incident Near Miss HSEQ Investigation Report* and contained in the H07-05 *Accident Incident Tool Kit* for the accident.

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

6.4 Drugs and Alcohol Policy

Why have a Policy on Drugs and Alcohol?

VolkerLaser is committed to maintaining healthy, safe and productive working conditions throughout its activities. VolkerLaser recognises that alcohol and drugs have an impact on an individual's ability to work safely and correctly and, as such, aim to provide an environment free from the misuse of drugs and alcohol.

Drinking alcohol raises the drinker's blood pressure. This can increase the risk of coronary heart disease and some kinds of stroke. Regular drinking, in excess of government guidelines, can also increase the risk of liver damage, cirrhosis of the liver, and cancers of the mouth and throat. People who drink heavily may develop psychological and emotional problems, including depression. The UK legal drink drive limit is 80mg of alcohol per 100ml of blood. According to the Royal Society for the Prevention of Accidents (RoSPA), drivers with a blood alcohol concentration between 50mg and 80mg per 100ml of blood are 2 to 2½ times more likely to crash and 6 times more likely to be in a fatal crash. The risk increases massively when over the limit. A driver who is double the legal limit is 50 times more likely to be in a fatal crash. 18% of people killed in road crashes have traces of illegal drugs in their blood, with cannabis being the most common. People are killed and seriously injured in drink drive, or drug related, crashes every week. It is not just the drivers who have been drinking or misusing drugs who suffer, but often their passengers, people in other vehicles, pedestrians, cyclists or motorcyclists, and the families of everyone involved.

6. COMPANY HEALTH & SAFETY PROCEDURES (CONTINUED)**6.4 Drugs and Alcohol Policy (Continued)**

Drugs and alcohol impair judgement, can make people over confident and more likely to take risks. Reactions can be slowed, judgement of distance is affected, and your field of vision may be reduced. Drug and alcohol misuse can harm the misuser both physically and mentally, and through the misuser's acts or omissions, other people.

'Drug misuse' refers to the use of illegal drugs and the misuse, whether deliberate or unintentional, of prescribed drugs and substances such as solvents.

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

The Legal Requirements

VolkerLaser has a general duty under the Health and Safety at Work etc. Act 1974 to ensure, as far as reasonably practicable, the health, safety and welfare at work of our employees and those working on our behalf. We also have a duty under the Management of Health and Safety at Work Regulations 1999, to assess the risks to the health and safety of our employees. If we knowingly allow an employee under the influence of drug misuse or alcohol to continue working and their behaviour places the employee or others at risk, we could be prosecuted. Employees are also required to take reasonable care of themselves and others who could be affected by their acts or omissions.

The Transport and Works Act 1992 makes it a criminal offence for certain workers to be unfit through drugs and / or alcohol while working on railways, tramways and other guided transport systems. The operators of the transport system would also be guilty of an offence unless they had shown all due diligence in trying to prevent such an offence being committed.

The Road Traffic Act 1988 states that any person who, when driving or attempting to drive a motor vehicle on a road or other public place, is unfit to drive through drink or drugs shall be guilty of an offence. An offence is also committed if a person unfit through drink or drugs is in charge of a motor vehicle in the same circumstances.

The principal legislation in the UK for controlling the misuse of drugs is the Misuse of Drugs Act 1971. Nearly all drugs with misuse and / or dependency liability are covered by it. The Act makes the production, supply and possession of these controlled drugs unlawful except in certain specified circumstances (for example, when they have been prescribed by a doctor).

Definitions**Drugs - for the purpose of this Policy are:**

- 'Controlled drugs' as defined in the Misuse of Drugs Act 1971 and its subsequent modification orders
- Medicines used without prescription or in excessive (above therapeutic) doses as defined by the toxicologist or medical review officer
- Certain prescription or over the counter medications which contain 'controlled drugs'
- Substances which may carry warnings against consumption, inhalation or ingestion such as glue, solvents and vapours

Medicines - are defined as those prescribed to the person or brought 'over the counter'

Chain of custody - the process used to maintain the chronological history of a (Drugs and Alcohol) sample in order to guarantee the identity and integrity of the sample from collection through to reporting of the test results.

6. COMPANY HEALTH & SAFETY PROCEDURES (CONTINUED)**6.4 Drugs and Alcohol Policy (Continued)****D&A - Drugs and Alcohol****Scope**

This Policy applies to the following persons:

- Employees of VolkerLaser (temporary and permanent)
- Any person who is employed by a contractor engaged by VolkerLaser (Hereinafter referred to as a "Subcontractor")
- Any self-employed person engaged directly by VolkerLaser or through any third party

All visitors to VolkerLaser sites or offices must be advised of the Drug and Alcohol Policy, and the implications of failing to comply, as part of the site or office induction process.

Policy

The consumption of alcohol by employees is inappropriate at any time when working or before work whenever work performance could be adversely affected.

The use of drugs is inappropriate at any time when working or before work whenever work performance could be adversely affected.

The use of drugs prescribed by a doctor, which may affect your ability to perform your job, must be notified in confidence to your Line Manager. Temporary impaired performance may require temporary redeployment.

The use of non-prescribed 'over the counter' medication, which may cause drowsiness, or loss of co-ordination must be reported to your Line Manager.

Dispensing, distributing, possessing, using, selling or offering to buy controlled drugs at work is prohibited. Any such activity (including reasonable suspicion of it) on VolkerLaser premises will be reported to the police immediately.

Any employee found to be in breach of these rules will be liable to dismissal without notice on the grounds of gross misconduct under the VolkerLaser Disciplinary Procedure.

To assist in the effective implementation of this policy VolkerLaser reserves the right to have tests carried out on individuals following any incident where there is suspicion that drugs and / or alcohol may have been a contributory factor. Random screening may also be carried out.

VolkerLaser reserves the right to search employees or their property held on VolkerLaser premises at any time if there is a suspicion that the prohibition on drugs or alcohol is or has been infringed.

Refusal to consent to testing or search will be treated as gross misconduct under the Disciplinary Procedure and may result in the termination of employment without notice.

Where an employee is placed on a contract where more stringent terms apply e.g. Network Rail, LUL etc. then the more stringent terms will prevail over those contained within this Policy. Any transferred employees will be provided with a copy of the more stringent policy when placed on a contract to which it applies.

Any persons involved in safety critical work for Network Rail will be subject to the relevant Network Rail company standards regarding alcohol and drug screening and disciplinary procedures, which includes random screening. Details of these standards will be provided when relevant.

6. COMPANY HEALTH & SAFETY PROCEDURES (CONTINUED)**6.4 Drugs and Alcohol Policy (Continued)****Policy in Operation****Employees must not:**

- Report or try to report for work under the influence of drugs, having just consumed alcohol, or be in an unfit state due to the use of drugs or alcohol. Remember you will fail the alcohol test if your blood contains 80mg or more per 100ml of blood (or the equivalent in your breath / urine), which is the legal limit for driving
- Be in possession of controlled drugs in the workplace without having reported the fact to your Manager
- Be in possession of any illegal drugs in the workplace
- Consume drugs or alcohol while on duty which includes 'on call'
- Attend training or assessment events while under the influence of drugs or alcohol

Failure / refusal of a drugs and alcohol test (including non-attendance)

If an employee refuses to take a drugs and / or alcohol test or they take a test and the result is positive then they will be subject to the VolkerLaser Disciplinary Procedure, which may include dismissal without notice on the grounds of gross misconduct.

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

- Pre Employment: new employees may be required to pass a Drugs and Alcohol test before they are considered for employment, if there is sufficient cause
- Random: a percentage of employees may be screened each year. These persons may not receive any notice before they are due to attend screening
- For Cause: screening to find out whether drugs or alcohol was a factor in an accident or incident, where the persons actions or omissions are suspected of contributing to the accident or incident, or the behaviour of the person gives cause to suspect that person is unfit to continue work
- Transfer: screening will be carried out if a person is transferring or being promoted to a post involving safety critical work, or activities that affect safety critical work

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

If you are found to have unlawful drugs or alcohol in excess of the limits set out above in your system you may be suspended from work without payment until such time as you are certified to be "clear" of such drugs or alcohol.

Right of Appeal

If following a 'positive' screen result you feel that you have grounds to appeal you must do so first through your Line Manager in writing, who will then refer the appeal request to the appropriate director.

Employees Responsibilities

In addition to your responsibility not to report or try to report for work under the influence of drugs, having just consumed alcohol, or be in an unfit state due to the use of drugs or alcohol, you must:

- Advise your Line Manager if you are taking any medication in writing before you report for work
- Declare any medication you are taking and if possible produce the labels to the screening officer before you are tested
- Advise your Line Manager if you have any reason to believe that you might have accidentally consumed drugs

6. COMPANY HEALTH & SAFETY PROCEDURES (CONTINUED)**6.4 Drugs and Alcohol Policy (Continued)****If You Need Help**

VolkerLaser will provide employees with all the necessary support, guidance and help if you think you have, or may be developing an alcohol or drug problem or any other problem. In the first instance you should approach your Line Manager, the Occupational Health Nurse or the Human Resources Department who will treat it in the strictest confidence.

6.5 Control of Substances Hazardous to Health (COSHH) Regulations

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

COSHH is specifically addressed at internal and subcontractor pre-start meetings with COSHH assessments forming an integral part of the safe systems of work. COSHH assessments are produced using H48-01 *COSHH Assessment Tool*. For further information please refer to H48 *Control of Substances Hazardous to Health*.

Control of Dust: In the workplace the creation of dust may cause risk to health, notably where silica dust is present. Silica is a natural substance found in rocks, sand and clay and products including bricks and concrete. Dust may be created by the activities carried out including grinding, drilling, cutting, sanding, chiselling or mixing and handling materials. All activities must be assessed and control measures determined including:

- Obtain information about the product including a COSHH assessment
- Identify the best working practice without creating dust
- Use dust suppressant controls including wet cutting, dust extraction etc.
- Wear PPE at all times
- When wearing a tight fitting face respirator (mask) it must be face fit tested with the wearer being FFP3 specification minimum. The wearer must also wear the mask correctly when being used including being clean shaven. **This will be a zero tolerant requirement.**

6.6 Construction (Design and Management) Regulations (CDM) 2015

VolkerLaser fully embrace their responsibilities under the Construction (Design and Management) Regulations 2015.

Whilst generally employed in a Principal Contractor or Contractor, VolkerLaser accepts and discharges its responsibilities in order to achieve standards of health and safety performance in excess of the statutory minimum.

Project specific arrangements are described in the *Site Management Plan* containing the, construction phase plan, supporting risk assessments, method statements and safe systems of work.

6.7 Consultation with Employees

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

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

- The introduction of any changes in working methods
- Introduction of new technologies including plant and equipment
- Arrangements for appointing competent persons
- Relevant health and safety information (safety committee)
- Planning and organisation of any health and safety training

This will be either directly or through elected representatives

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

6. COMPANY HEALTH & SAFETY PROCEDURES (CONTINUED)**6.7 Consultation with Employees (Continued)**

Consultation may be carried out during:

- Inductions
- Tool box talks
- Method statement briefings
- Subcontractors' progress meetings
- Planned health and safety meetings
- Pre-arranged or ad-hoc meetings following any responses to information posted on notice boards

6.8 Emergency Procedures

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

6.9 Fire Precautions

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

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

Adequate fire notices and signs shall be prominently displayed, as identified by the fire safety risk assessment.

All emergency procedures pertinent to the work activity shall be adhered to. These procedures will vary from location to location and training will be given.

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

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

6.10 First Aid

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

At least one qualified first aider shall be provided at each Static work location dependent on the risk of injury or ill health.

An appointed person shall be identified at each location who may also be a first aider.

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

6.11 Gross Misconduct

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

- A serious or wilful breach of the safety rules specific to each location
- Failure of a drugs and alcohol test
- Unauthorised removal or interference with any guard or protective device
- Unauthorised operation of any item of machinery, plant or equipment
- Unauthorised removal of any item of first aid equipment
- Wilful damage to, misuse of, or interference with any item provided in the interest of health, safety or welfare at work

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6. COMPANY HEALTH & SAFETY PROCEDURES (CONTINUED)

6.11 Gross Misconduct (Continued)

- Unauthorised removal or defacing of any label, sign or warning device
- Misuse of chemicals, flammable or hazardous substances, or toxic materials
- Smoking in any designated 'No Smoking' area
- Smoking whilst handling flammable substances
- Horseplay or practical jokes which could cause accidents
- Making false statements or in any way deliberately interfering with evidence following an accident or dangerous occurrence
- Misuse of pneumatic, hydraulic or electrical equipment
- Dangerously overloading any item of lifting equipment
- Overloading or misuse of any vehicles

6.12 Health

Elements of VolkerLaser's Occupational Health system include:

- **Pre-employment health questionnaire** to ensure they are fit and capable for effective performance at work without risk to health
- **Management of work activities to eliminate / reduce risks to health**, including planning, organisation and risk assessment
- **Health surveillance** to evaluate whether there are any adverse effects the work or working environment are having on the individual and to act upon the earliest signs of possible harm
- **Work in a 'Safety Critical' environment** – Additional medical checks to be undertaken in conjunction with document H74 *Occupational Health - General*. In addition specific client requirements may also request the requirement of safety critical medicals. (Network Rail / HE etc)
- **Assessment of fatigue**, as it is a significant risk during construction activities due to the safety critical nature of the work. The risk of accidents from cumulative fatigue is well recognised
- **Consideration of new and expectant mothers** - see *Employee Handbook*. The Human Resources Department will notify the Company Occupational Health Nurse. Risk Assessment will be carried out on the individual employee concerned

Procedures detailing how these are managed within VolkerLaser are contained within this document and within the company management system.

6.13 Lone Working

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

6.14 Manual Handling

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

- Where practicable the need for manual handling shall be eliminated
- Manual handling assessments need to address task, load, work environment and the individuals capability
- Mechanisation of repetitive operations (i.e. kerbing, lifting or handling of drums, etc.) will be adopted as the solution following assessment

6. COMPANY HEALTH & SAFETY PROCEDURES (CONTINUED)**6.15 No-Smoking Policy**

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

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

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

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

This policy applies to all employees, contractors, customers and visitors, and all staff are obliged to support the implementation of this policy.

Appropriate “No Smoking” signs will be clearly displayed at all entrances and exits, within the premises, and in company vehicles.

Those who do not comply with the smoking law are liable to a fixed penalty fine and possible criminal prosecution.

If you would like further advice or assistance on quitting smoking please contact Occupational Health on 01992 305045 or the NHS by calling 0300 123 1044 (<http://smokefree.nhs.uk/>).

6.16 Notices and Written Instructions

All hazard / warning signs and notices displayed on the premises shall be complied with.

Where applicable, work permits will be strictly enforced e.g. confined space work, where only authorised persons will be allowed to work.

6.17 Office / Work Place Safety

Electrical installations shall only be installed by a competent person and tested at regular intervals in accordance with the Electricity at Work Regulations 1989.

Offices shall be kept at a reasonable temperature, be well ventilated and lit.

Passages and stairs shall be kept clear of obstructions and well lit.

Flooring shall be kept in a safe condition. Damaged carpeting, liquid spillages etc. shall be reported to management.

Filing cabinets shall be loaded from the bottom drawers first and only one drawer opened at a time. Storage racking shall be of adequate strength, properly loaded, stable, and securely fixed where possible.

Great care shall be taken in the storage and use of toxic, flammable and corrosive substances, chemicals and liquids. They shall be stored and used in accordance with the manufacturers' instructions / COSHH assessment.

Portable electric tools and equipment shall operate at 110V or lower. Where this is not possible RCD protection shall be used.

Electrical equipment shall be visually inspected and checked for defects at regular intervals and, if a fault is suspected, taken out of use and checked by a qualified electrician. Trailing electric cables shall be avoided. An appropriate maintenance system (e.g. HSE guidance) shall be established for all electrical equipment and records of inspection and testing maintained as necessary.

Employees who are considered to be display screen equipment users (through H81-01 *DSE Self-Assessment*) shall be entitled to free eyesight tests and the provision of corrective eyewear if prescribed.

DSE users will be provided with suitable equipment to establish an ergonomic workstation. Suitable instruction on its adjustment will be provided.

Adequate welfare facilities shall be provided. All dangerous parts of machinery shall be adequately guarded.

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6. COMPANY HEALTH & SAFETY PROCEDURES (CONTINUED)

6.18 Permits to Work

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

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

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

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

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

Permits will be required for the following activities:

- H55 *Control of Lifting Operations, Equipment and Accessories*
- H09-09 *Permit to Operate Plant*
- H14-01 *Permit to Break Ground*
- H14-06 *Permit to Work Near Power Lines*
- HSE-21 *Confined Space - Entry Permit*
- HSE-26 *Electrical Permit to Work*
- HSE-27 *Hot Works Permit*
- HSE-32 *Permit to Work - Hydro Demolition*
- HSE-40 *Permit to Demolish*
- HSE-53 *Steps and Ladders Permit*
- HSE-66 *Working at Height - Permit to Work*
- Q25-11 *Temporary Works Permit to Proceed Erect, Load & Strike*

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

6.19 Personal Protective Equipment (PPE)

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

- Protective equipment shall be obtained from approved suppliers only and used, stored and maintained in accordance with manufacturers' instructions and the training provided
- Any damage, loss, fault or unsuitability of protective equipment shall be reported to management
- VolkerLaser will issue suitable protective equipment to directly employed staff and operatives, and undertake to replace such equipment whenever necessary. Any issue of PPE will be recorded using form HSE-36 *Personal Protection Equipment Issue Record*
- Additional checks / tests will be undertaken on required items of PPE e.g. Face Fit Testing for the use of RPE

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6. COMPANY HEALTH & SAFETY PROCEDURES (CONTINUED)

6.20 Plant & Work Equipment

VolkerLaser requires all plant and equipment used on site to comply with the Provision and Use of Work Equipment Regulations (PUWER) 1998, and the Lifting Operations and Lifting Equipment Regulations (LOLER) 1998 as applicable. Management of Plant and Equipment should be in accordance with procedure H09 *Working with Plant* and the following should be adhered to:

- All work equipment (from heavy excavation plant to hand held tools) must be suitable for the purpose for which it is intended.
- Work equipment is maintained and inspected by a competent person, in accordance with legal requirements and manufacturers' recommendations.
- Records of inspection, test and thorough examination are required to be maintained.
- Operation of any machine, plant or equipment is not permitted unless employees have been trained, authorised, or are under adequate supervision.
- Operatives must not use mobile phones or 'hands free' whilst operating plant.
- All machine guarding shall be utilised.
- Any fault, damage, defect or malfunction of any machinery, plant, equipment, tools or guards shall be reported to management for action, which may include taking the item out of use. H09-07 *Daily Plant Inspection (PUWER)* must be completed.
- Repair, maintenance or cleaning of machinery, plant or equipment shall only be carried out in accordance with manufacturers' recommendations and risk assessment where appropriate.
- No machinery, plant or equipment shall be left in motion, or with the engine running, whilst unattended. Plant and vehicles must be immobilised and the ignition key removed whilst unattended, keys must be kept in a secure place when not in use.
- No repairs or maintenance work on any equipment shall be undertaken unless employees are trained and authorised to do so, including changing of abrasive wheels.

6.21 Vibration

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

It is necessary to limit exposure to Hand Arm Vibration using the following methods listed, and outlined in the Company's H13 *Control of Vibration at Work* in order of priority:

- Risk Management: Ensure the work undertaken is assessed and individuals not put at risk when using vibratory equipment. Every effort shall be made as far as reasonably practicable to eliminate the risk of exposure of vibration to any member of the workforce. Plant selection will be taken on a risk assessment approach to the work activities and where possible eliminate the need to use hand held equipment.
- Awareness: Workers using hand held vibratory equipment must be made aware of the condition and risks associated with not following appropriate control measures. Information will be provided to the workers regarding vibration levels using the 'vibration information sheet, available on all sites outlining the signs and symptoms of vibration white finger. Site based Managers and Supervisors will provide instructions for people (H13-04 *Control of Vibration at Work - PowerPoint*) working under their control including:
 - Wear gloves at all times when using vibratory equipment to keep hands warm and help ensure good blood circulation to the fingertips
 - Ensure all defective equipment is reported and taken out of service if necessary. Ensure all accessories and attachments are suitable and in good order
 - Use all equipment properly, including handling and correct use of attachments
 - Ensure job rotation is carried out where possible, this will help reduce the risk of exceeding the trigger time

6. COMPANY HEALTH & SAFETY PROCEDURES (CONTINUED)

6.21 Vibration (Continued)

- **Plant and Equipment:** Through working closely with our supply chain partners and internal plant department we will ensure that handheld power tools we use will have the lowest possible vibrating magnitude, including the equipment itself and associated attachments. Maintenance of all hired power tools will be placed under an inspection and maintenance contract. VolkerLaser owned handheld power tools shall be inspected and maintained in line with the manufacturers recommendations. A central library of vibration information relating to the vibration levels of each item of handheld powered equipment used in the company will be made available through the plant and safety department. At each work location an equipment inventory will be developed by the site manager displaying each item of hand held vibratory equipment (including its exposure limit value) (See H13-03 *Vibrating Tools Inventory (Vibration Assessment)*).

Employees using vibratory equipment will be suitably trained in its safe use including toolbox talks and inductions. (H13-04 *Control of Vibration at Work - PowerPoint*).

- **Occupational Health:** Refer to Occupational Health procedures and processes. All workers involved in using hand held vibratory equipment will complete a record log (H13-01 *Daily Vibration Log (for printed logbook)*) of the exposure times (trigger times) they have been exposed to. HAVS logs form H13-02 *Daily Vibration Assessment Record (Non-employees)* can be used for contractor workers where required.
- **Monitor and Review:** The management of HAVS will be monitored both proactively and reactively.
- **Proactive:** Through site audits and inspections will look at the work activity, the equipment being used and its condition. The way in which the equipment is used by the operator will also be observed (the way it is used, use of PPE, job rotation). Sample monitoring will be used to ensure individuals are not exceeding their daily exposure levels.
- **Reactive:** Through occupational health and RIDDOR notifications.

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

6.22 Vehicles & Carriage of Dangerous Goods Vehicles

All employees must comply with the requirements as outlined in *the VolkerWessels UK Driving for Work Policy and Handbook* along with the following:

- Regular checks of vehicles, in conjunction with company procedures and manufacturers' recommendations, shall be carried out prior to use.
- Driving or operating any vehicle is not permitted without the appropriate driving licence, competency or authorisation.
- Unauthorised passengers or unauthorised loads shall not be carried.
- Vehicles shall not be used for unauthorised purposes.
- Vehicles shall not be loaded beyond the stated capacity.
- General daily checks will be made on all commercial vehicles and any defects will be recorded using the relevant defect report. These reports will be completed by the driver of the vehicle and copies supplied to the VolkerLaser Plant and Fleet department.
- Driving or operating vehicles whilst suffering from a medical condition or illness that may affect ability is not permitted.
- Driving or operating vehicles whilst under the influence of alcohol or any other drug, which may affect operating ability, is not permitted.
- All available safety features such as seat belts shall be utilised.
- Use of mobile phones in vehicles whilst driving is restricted to hands free use only however still avoid making or taking phone calls when driving wherever possible.

6. COMPANY HEALTH & SAFETY PROCEDURES (CONTINUED)**6.23 Carriage of Dangerous Goods**

The Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations 2009 (CDG2009) and ADR 2019 (European Agreement Concerning the International Carriage of Dangerous Goods) define a set of requirements that VolkerLaser must follow when actively involved in the carriage of dangerous goods by road, in Great Britain or in Europe.

VolkerLaser transport significant amounts of dangerous goods (not including tanks) that are generally used for highway maintenance, including water proofing of roads, structures etc. or for other refurbishment or new builds within the private sector including car parks and roofing etc.

As a number of VolkerLaser activities fall within regulations, through transportation, packaging, loading, filling or unloading dangerous goods there is a requirement to employ a qualified Dangerous Goods Safety Advisor.

Details relating to the management of dangerous goods in VolkerLaser are defined within H19 *Carriage of Dangerous Goods*.

6.24 Welfare

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

6.25 Working at Heights

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

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

- AVOID the risk by not working at height - where it is reasonably practicable to carry out the work safely other than at a height do so
- PREVENT falls - where it is not reasonably practicable to avoid work at height, you should assess the risks and take measures to allow the work to be done whilst preventing, so far as is reasonably practicable, people or objects falling. This might include ensuring the work is carried out safely from an existing place of work, or choosing the right work equipment to prevent falls
- MITIGATE the consequences of a fall - where the risk of people or objects falling still remains you should take steps to minimise the distance and consequences of such falls. This also involves the selection and use of work equipment
- At all stages give collective protective measures (e.g. guardrails, nets, airbags, etc.) precedence over personal protective measures (e.g. safety harnesses)
- In the event of using scaffold structures all scaffolds must be suitably designed. Following the installation of the scaffold a handover of the scaffold structure must be undertaken at the place of work and following a visual inspection by the scaffold organisation and Site Manager. A complete and documented handover certificate must be obtained. Prior to its first use a statutory inspection must be undertaken by a competent person with a copy of the inspection being obtained and made available for inspection. Scaffold tags or similar must be used to provide details about the scaffold itself and that statutory inspection history. Statutory inspections must be undertaken at no greater than 7 day intervals or following changes to the structure or poor weather conditions. Only competent and trained people will be authorised to make any alterations to a scaffold structure.

6.26 Working Conditions / Environment

All employees shall make proper use of all safety equipment and facilities provided to control working conditions / environment.

Work areas shall be kept clear and in a clean and tidy condition.

All rubbish and waste materials including chemicals or oils within the working area shall be disposed of using the facilities provided, at correct disposal points and in accordance with the details within the appropriate method statements or specific site arrangements.

Chemicals, oils or other hazardous substances shall not be discharged into watercourses, sewers or drains. Any spillage of liquids shall be correctly contained / removed as soon as is practicable.

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| Approved for IMS: | IMS Manager | Document owner: | Senior HSEQ Manager | Workspace file: | n/a | Page 28 of 31 |
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6. COMPANY HEALTH & SAFETY PROCEDURES (CONTINUED)**6.26 Working Conditions / Environment (Continued)**

Toilet and messing facilities provided shall be kept clean and tidy at all times.

Personnel shall inspect their work areas continually to ensure they are safe and that no fire or ignition sources are left unattended during or at the end of each working period. Where the activity being undertaken carries any risk of a fire, fully charged extinguishers and precautions to stop flying sparks i.e. fire blankets / screens shall be in place. Where hot work has been undertaken the area shall be checked and any hot spots doused.

All materials shall be stored in such a manner as to eliminate hazards.

Health and Safety Warning signs and suitable precautions shall be provided to protect anyone from remaining residual risks including falls from height, PPE etc.

Any person found contravening these requirements shall be subject to disciplinary action.

6.27 Work in Rail Environment

As an established contractor, VolkerLaser are an RISQS (Railway Industry Supplier Qualification Scheme) approved contractor holding various core modules. They, along with the supporting procedures as outlined in this document, enable rail work to be conducted safely, efficiently and in compliance with all relevant Railway Group and Network Rail Standards. The VolkerLaser RISQS Manual incorporates this policy in addition to the specific rail requirements for working on Network Rail Infrastructure environments.

6.28 Young Persons

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

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

6.29 Lifting Operations

All lifting operations must be in compliance with the requirements of safety legislation including the Health & Safety at Work Act 1974, Management of Health and Safety at Work Regulations 1999, Provision and Use of Work Equipment Regulations 1998 and most specifically the Lifting Operations and Lifting Equipment Regulations 1998.

All lifting Procedures in VolkerLaser in accordance with procedure H55 *Control of Lifting Operations, Equipment and Accessories* and must therefore be proven to be planned, supervised and safely executed.

All those involved in the planning, site supervision and carrying out of lifting operations must have the appropriate level of competency for the task being undertaken.

VolkerLaser requires competency checks to be undertaken ensuring all those undertaking roles within lifting operations have the necessary skills, knowledge and experience to carry out their duties.

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

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

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

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

6. COMPANY HEALTH & SAFETY PROCEDURES (CONTINUED)

6.30 Temporary Works

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

VolkerLaser's temporary works procedure is outlined in Q25 *Temporary Works*.

6.31 Working Close to The Public

VolkerLaser undertake work activities which has a direct impact on people who are not employees for example members of the public, home residents, tenants or visitors.

The health and safety at work act places a duty on all employers and the self-employed to take reasonably practicable steps to ensure the health and safety of people who are not in their employment.

In the event that work will involve work close to members of the public, residents, tenants, children, elderly or people with disabilities the following considerations will be made and controls integrated into the projects site management plan / construction phase plan, risk assessments and method statement.

- Identify the nature of the work
- Identify where the work will be done
- Identify who will be exposed during the work
- The risks posed to those people
- The time required to undertake the work
- Risks associated with the need to make any evacuation

In the event of a premises remaining occupied during the work, the controls measures identified through the construction will be monitored and reviewed as required.

6.32 Working Close to Asbestos

There may be situations where VolkerLaser are required to work close to or with Asbestos Containing materials. (e.g. structures, domestic properties, roofing etc.).

At all times the HSE's Asbestos Essential sheets will followed for Licenced and Non-Licenced works.

In the event of any Asbestos work being identified either at Planning or Construction Phase Stages the VolkerLaser Health and Safety Manager must be informed.

6.33 Working Close to Lead Containing Materials

There may be situations where VolkerLaser are required to work close to or with Lead Containing materials (e.g. removal of existing lead paint coatings, roof work). Where Lead has been identified as known hazard additional arrangements must be to manage the construction phase.

In the event of any Lead materials being identified either at Planning or Construction Phase Stages the VolkerLaser Health and Safety Manager must be informed.

6.34 Specialist Work Activities

Where specialist work activities are required (e.g. Hydro Demolition / Confined Spaces Entry etc.) and where Subcontractor resource is utilised the following steps must be taken:

- Contractors must be approved
- Pre start HSEQ Planning meeting undertaken
- Seek advice from the HSEQ department
- RAMS must be scrutinised and evaluated prior to acceptance
- RAMS briefings and Daily start of shift briefings
- Levels of Supervision increased including Subcontractor attendance
- Implement a permit to work system
- Subcontractors performance must be monitored

7. IMS AUTHORISATION**Document owner approval:****Philip Bruce**, Senior HSEQ Manager - 27.08.2019**Approval for IMS:****Alex Boatwright**, IMS Controller - 27.08.2019