



Lorne Stewart Group



Health, Safety & Environmental Policy

MAKING THE DIFFERENCE

1.0 REVISION HISTORY

Revision	Description of Revision	Date	Issue Authority
Rev 0	First Issue	January 2023	Group Head of SHEQ
Rev 1	Second Issue	January 2024	Group SHEQ Director
Rev 2	New section added 12.5 Smoking & Vaping in the workplace	March 2024	Group SHEQ Director
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Rev 4			
Rev 5			
Rev 6			
Rev 7			
Rev 8			
Rev 9			
Rev 10			
Rev 11			
Rev 12			
Rev 13			
Rev 14			

2.0 ISSUE AUTHORITY

Issue Authority Signed:		Principal Author Signed:	
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Position:	CEO Lorne Stewart Group Engineering	Position:	Group SHEQ Director

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4.0 HEALTH & SAFETY POLICY STATEMENT OF INTENT

Lorne Stewart Group recognises the fundamental importance of a progressive health and safety management policy to the successful operation of the Group in all that it does.

This statement is a declaration of intent to establish and maintain a safe and healthy environment for all stakeholders.

The aims and objectives of this policy are regularly reviewed, updated as appropriate and communicated to all employees.

Lorne Stewart Group will, so far as is reasonably practicable:

- Provide and maintain equipment and system of work that are safe, and which avoid or reduce hazards and risk to the health & safety of all parties.
- Ensure that the use, handling, storage and transportation of articles and substances is safe and avoids or reduces risks to person's health & safety.
- Provide information, instruction, training and suitable supervision as may be necessary to ensure that all tasks are carried out in safe and responsible manner.
- Ensure that Group premises are maintained in a safe and healthy manner by ensuring safe access and egress, high standards of housekeeping, safe storage of goods and waste materials.
- Provide adequate and suitable welfare facilities.

It is Lorne Stewart Group's position that work-related accidents or ill health are unacceptable, and that all reasonable and proactive precautions must be applied to all work activities to eliminate personal injury, prevent damage to property and equipment and protect the environment.

The overall responsibility for the health, safety and wellbeing of employees and others who may be affected by its acts or omissions lies with Lorne Stewart Group Executive Board Directors.

Employees of the Group are expected to fully support the objectives stated above. The highest possible standards in this area must be achieved and maintained as part of the Lorne Stewart Group strategy to pursue excellence in all that it does.

Lorne Stewart Group senior management is committed to the implementation of this policy and will give full support to those authorised to carry it out.

Lorne Stewart Group will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy and effectiveness.

This statement of intent will be made available to all employees and other interested parties and will be displayed within Group premises. It will be reviewed annually or following any changes to relevant legislation or Group policy.

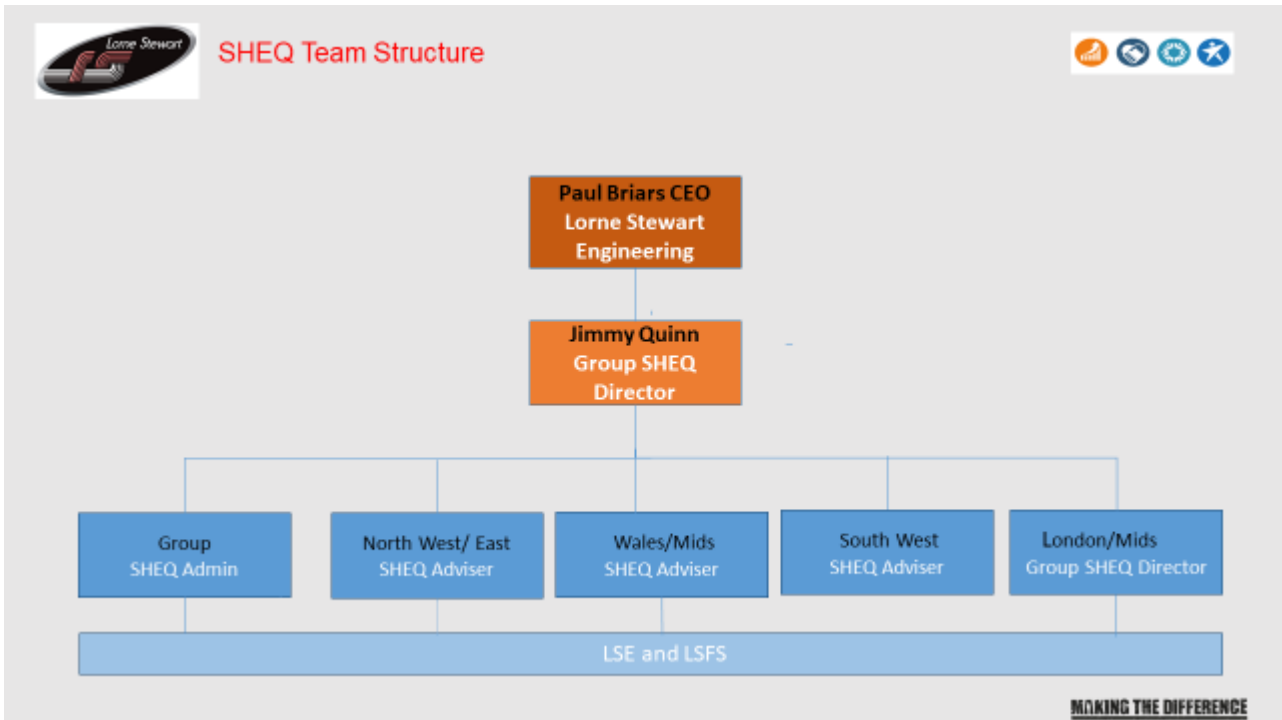


P Briars

CEO Lorne Stewart Engineering

January 2024

4.1 SHEQ Department Management Structure



5.0 INTRODUCTION

Lorne Stewart Group (LSG) consists of Lorne Stewart Engineering, Lorne Stewart Facilities Services, Rotary Building Services & MDSL and has a work force of approximately 750 personnel.

LSG is one of the UK's leading independent building services companies with an annual turnover of £135m.

LSG provides a range of specialist skills harnessed through our Mechanical & Electrical Engineering, Facilities Services and offsite Modular Design Solutions business. We provide our customers with building service solutions through the construction and operational phases of any building asset.

Lorne Stewart Engineering is a regionalised building services contractor with locations across the UK.

Lorne Stewart Facilities Services deliver planned mechanical and electrical compliance contracts, reactive works, project completion and soft service

Integration, energy solutions and pest control.

Rotary Building Services is a national building services contractor focused on delivering technically complex major projects.

MDSL design and manufacture a complete range of mechanical and electrical offsite prefabricated solutions for the construction and allied trades.

NOTE

For the purpose of this document the abbreviation LSG will mean Lorne Stewart Group and / any Lorne Stewart Group Company.

6.0 ARRANGEMENTS FOR CARRYING OUT THE GROUP SHE POLICY

The implementation of SHE issues is a function of management and supervision at **ALL** levels. It follows the normal chains of responsibility and authority, which are updated periodically for all departments and businesses of LSG. They are available for inspection to every employee on request to his / her manager / supervisor.

ALL employees of LSG receive / have access to / a copy of the policy and should familiarise themselves and ensure that their colleagues comply with all relevant health and safety legislation and instructions. If / where applicable, they wish to delegate any part of these duties to a colleague with special responsibility for safety, they may do so, always remembering that the ultimate responsibility still rests with them.

Members of the LSG SHEQ Department have the authority to order work to stop if they consider that health and / or safety are endangered.

7.0 RESPONSIBILITIES FOR HEALTH AND SAFETY

7.1 Managing Director and Executive Board Directors

Shall:

- Familiarise themselves with, and ensure compliance with, the LSG SHE Policy.
- Review the LSG SHEQ Department reports and, where necessary, take on-going remedial action.
- Review accident investigation reports, and where appropriate satisfy themselves that corrective action has taken place.
- On occasion, accompany the LSG SHEQ Department and carry out SHE Inspections to satisfy themselves that adequate safety standards are being maintained.
- Ensure that all supervisors are available for, and involved in, safety inspection.
- Ensure compliance with all pertinent statutory regulations.
- Inform the LSG SHEQ Department whenever new plant or process is to be introduced so that hazards can be guarded against prior to use / operation.
- Ensure that ALL visitors to LSG premises comply with the LSG SHE Policy and attendant procedures.

7.2 Group Head of Safety, Health, Environment & Quality

Shall:

- Exercise the necessary authority to order work to stop if health or safety are endangered, or environmental issues are noted communicating reasons to the relevant Director(s) by the quickest available means.
- Supervise the work of the LSG SHEQ Department, ensuring that the requirements of the LSG SHE Policy are met.
- Assist and support directors, managers, Heads of Departments and supervisors in their task of implementing the LSG SHE Policy.
- Inspect sites, offices and associated plant, ensuring compliance with the LSG SHE Policy, make recommendations to LSG employees, where necessary, on matters relating to health and safety.
- Investigate accidents and damage to property and recommend corrective action.
- Review absence due to accident or injury at work and ensure that reportable occurrences are notified to the relevant enforcing authority.

- Maintain accident records and regularly inspect first aid procedures, facilities and records.
- Ensure that relevant safety training records are kept.
- Assist as necessary in the safety training of employees.
- Attend, and supply information for SHE meetings.
- Review any safety recommendations made by employees and encourage their interest in these matters.
- Circulate as necessary, information relevant to health, safety and environmental issues.
- Be conversant with current, and impending, health, safety and environmental legislation.
- Liaise with the Health & Safety Executive and similar enforcement organisations.
- On request give assistance / guidance / advice on any safety, health, welfare or environmental matters, which are of concern to any employees of LSG.

7.3 Regional Safety, Health, Environmental & Quality Managers

Shall:

- Exercise the necessary authority to order work to stop if health and / or safety are endangered, or LSG is at risk, communicating reasons to the relevant Director(s) by the quickest available means.
- Assist and support managers / Department Heads and supervisors in their task of implementing LSG SHE Policy.
- Inspect sites, offices and associated plant ensuring compliance with LSG SHE Policy, recommending directly to LSG employees on matters concerning health and safety.
- Investigate accidents and damage to property and recommend corrective action.
- Maintain accident records and regularly inspect first aid procedures, facilities and records.
- Assist in the safety training of employees.
- Attend and supply information for SHE meetings.
- Review any safety recommendations made by employees and encourage their interest in these matters.
- Circulate as necessary information relevant to health, safety and environment.
- Liaise with the Health & Safety Executive and similar enforcement organisations.
- On request, give assistance / guidance / advice on any safety, health, welfare or environmental matters, which are causing concern to any member of LSG.

7.4 Head of Human Resources

Shall:

- Liaise with the LSG SHEQ Department to ensure that the relevant requirements of the LSG SHE Policy are addressed.
- Review absences due to injuries / accidents at work ensuring that all reportable occurrences are notified to departments and authorities concerned.
- Attend as required any Health & Safety Committee meetings.

7.5 All Persons with a Managerial or Supervisory Responsibilities for Staff

Including Business Directors, Regional Directors, other Non-Executive Directors, Heads of Department, Contract Managers, Projects Managers, Project Engineers, and Site Supervision

Shall:

- Familiarise themselves with the LSG SHE Policy.
- Inform the LSG SHEQ Department of any serious accident or incident immediately.

- Ensure that all safety rules are observed and that personal protective equipment is worn or used where appropriate.
- Ensure that LSG employees under their control are adequately trained and made fully aware of any hazards in the workplace.
- Ensure that adequate supervision is available at all times, particularly for young and inexperienced persons.
- Seek to develop safe working practices, maintain good housekeeping to improve health and safety.
- Accompany LSG SHEQ Department on inspections and co-operate on safety matters.
- Ensure that all safety devices including guards are properly adjusted and maintained and used correctly.
- Ensure that all employees under their control are aware of first aid and emergency facilities and the location of the nearest person / operative trained in first aid.
- Ensure that all employees under their control know procedures to adopt in case of fire, bomb threat or other emergencies.
- Liaise with employees, sub-contract companies and safety representatives in their charge on all matters concerning Health & Safety.
- Attend safety committee meetings when required.
- Investigate all accidents promptly to discover their cause and take action to help prevent any recurrence.
- Complete accident report forms for all accidents involving injury, damage or loss.
- Advise the LSG SHEQ Department of all accidents / incidents.
- Ensure that all records relating to SHE matters are properly filed and readily available.
- Carry out and record workplace risk assessments and method statements.
- On occasion, accompany the LSG SHEQ Department and carry out SHE Inspections to satisfy themselves that adequate safety standards are being maintained.

7.6 Purchasing Department

Shall (this applies to all persons with an authority / responsibility for purchasing substances or articles for use at work);

- Ensure that all substances obtained for use by LSG employees, subcontractors or temporary staff have been reviewed and formally assessed on a CoSHH Risk Assessment form where the Control of Substances Hazardous to Health Regulations applies.
- Where the substance does not appear to have been assessed, notify the LSG SHEQ Department with the name of the substance and the name and address of the manufacturer or supplier, so that the substance can be reviewed and assessed if necessary prior to use.
- Ensure that all items purchased conform to all relevant health, safety and environmental standards

7.7 All Lorne Stewart Group Employees

Shall:

- Be aware of and always conform to the LSG SHE Policy.
- Always work within all SHE Regulations and Guidelines.
- Always wear appropriate personal protective equipment ensure that it fits, is properly adjusted, and is kept in good order.
- Be aware of the correct action to take in the event of accident, fire or other emergency.

- Always use the correct tools and equipment, with appropriate safety devices, for the job intended.
- Conform to all instructions given by Line Management and the LSG SHEQ Department and others with a responsibility for health and safety.
- Report to their immediate superior all accidents and damage whether persons are injured or not.
- Report defects in plant or equipment to their immediate Superior or Safety Representative.
- Direct reasonable and practical suggestions to improve health and safety at work to their immediate superior or Safety Representative.
- Be aware that wilful disregard for safety is considered a serious disciplinary offence.
- Be aware that attendance at the workplace whilst under the influence of alcohol or non-prescribed drugs which affect judgement and capabilities, thereby placing yourself and / or others at risk, is a serious disciplinary offence.
- As and when required, assist with the compilation of job specific method statements.
- Always observe all site / office rules and safe working practices.
- Report hazardous situations or conditions to their immediate superior or safety representative.
- Act and behave in a safe and responsible manner taking note of the task being undertaken, the working environment, others working in the area and how you actions can ensure the safety of yourself and others who may be affected.
- Be aware of and abide by LSG environmental standards and policies.

7.7 Safety Representatives (where appointed)

When appropriate shall:

- Familiarise themselves with the LSG SHE Policy.
- Promote safe working practices among LSG employees.
- Co-operate with managers / supervisors and LGS SHEQ Department on plant or equipment checks / inspections and any accident investigations.
- Report to management any hazardous conditions.
- Ensure all relevant information gained from Safety Committee Meetings is made available to LSG employees.

8.0 SAFE SYSTEMS AND METHODS OF WORK

It is LSG objective that all work undertaken shall, so far is reasonably practicable be carried out with minimum risk to health and safety. To this end all operations are to be carried out with the knowledge and awareness of the hazards involved or likely to be encountered, and proper means employed to eliminate or reduce them to the lowest practicable level.

The most appropriate plant and equipment must be used and the operator must be trained and competent in its use.

All control measures must be fully discussed with the works team prior to commencement of operations.

8.1 Permit to Work System

In the event of there being no other Permit to Work System on a site or work area with which LSG are obliged to comply, then should a permit be required for LSG to control a particular area or operation the Project Manager should delegate a responsible person to authorise procedures, this person will then be authorised in writing by the relevant Authorising Engineer. He must ensure that

all persons undertaking work controlled by the permit fully understands the instructions given and the precautions to be taken.

8.2 Low Voltage Electrical Works

Due to the potentially hazardous nature of working with electricity, all low voltage electrical works will be carried out as detailed in the Lorne Stewart Group Electrical Safety Rules, which will be available on all live projects.

8.3 Health and Safety Legislation / Documents

Copies of relevant safety information will be held on site and to be readily available for reference / inspection on request.

The LSG SHEQ Department hold copies of relevant statutory instruments.

8.4 Safety Plans

On any project where a LSG is acting as principal contractor as defined by the Construction (Design & Management) Regulations, and where these regulations apply a project specific Construction Phase Health & Safety Plan will be compiled and made available as required.

8.5 Method Statements

Method Statements will be produced as required, as the project develops to ensure that full consideration is given to works being carried out as safely as reasonably practicable, all persons involved in the task must be briefed on this and sign the appropriate method statement record of communication form.

8.6 Safety Inspections

Regular safety audits / inspections will be carried out by the LSG SHEQ Department personnel. All aspects of site safety issues will be included in the audit / inspection. Should any major safety issue be found to be unsatisfactory the Site Safety Inspection Action Requirements major section of the form will be completed by the person carrying out the audit / inspection and forwarded to the Project Manager. Confirmation that the listed items have been addressed will be forwarded to the auditor / inspector within 5 working days.

Copies of the completed Site Safety Audit / Inspection form will be circulated to relevant LSG and Project based staff as required.

Site supervision will regularly conduct on site safety inspections.

Directors and Senior Management will also carry out regular recorded inspection of the workplace.

8.7 Risk Assessments

Risk assessments will be carried out where necessary by site management / supervision using a Project Risk Assessment or a Task Specific Risk Assessment as appropriate. These are on-going throughout the project and will take into account changes in hazards and conditions as the project develops. High and medium risks must be addressed and suitable and adequate control measures instigated to reduce the risk to those affected. All persons involved in the task must be briefed on the assessment and sign the appropriate communication section on the risk assessment form. Sub-contractor risk assessments will be reviewed and where necessary amended prior to the commencement of work activities. Copies of risk assessments will be forwarded to the client / principal contractor on request.

8.8 Young Person's Risk Assessment

A Young Person's Risk Assessment will be carried out for all persons under the age of 18 who carry out work tasks for LSG or any Sub-contract company. This assessment should be conducted by the most senior member of site management / supervision available, with the young person in attendance and prior to the commencement of work activities. Project management will also

ensure that a similar assessment is carried out by sub-contract companies whenever a young person is employed.

Items detailed in the Health & Safety (Young Persons) Regulations 1997 such as inexperience, lack of awareness of risk, and immaturity must be considered, as well as any task that it is prohibited for a young person to carry out.

The young person must be closely supervised at all times and must not undertake any task or use any equipment for / on which they have not been previously trained.

8.9 Manual Handling Assessments

Manual Handling Assessments will be carried out by site supervision in consultation with persons involved, when mechanical handling is not practicable or available and there is a risk of injury to those carrying out the task. This will help to ensure that plant, equipment and materials are moved around site by the safest practicable means. All persons involved in the task must be briefed on the assessment and sign the appropriate form.

8.10 Plant and Equipment

Safe plant and equipment are essential. Site supervision will carry out regular inspections to ensure plant and equipment is safe to use and record this on the relevant Plant Inspection form. The user is responsible for visually inspecting the plant / equipment prior to use and reporting defects to supervision for remedial action. Where plant is hired from any other source identical management methods will be implemented.

8.11 Control of Substances Hazardous to Health (CoSHH)

Appropriate CoSHH Assessments will be available at all workplaces. Site management must contact a member of the LSG SHEQ Department if an assessment is required which is not contained in the site binder, to enable the assessment to be provided from the LSG database.

8.12 Coordination, Cooperation & Communication

LSG believes that coordination, cooperation and communication are the cornerstones to a safe working environment.

LSG will work with clients, principal contractors, principal designers, designers, employees and sub-contract companies and others to ensure that;

All tasks are coordinated with to help ensure a safe and well managed working environment.

Cooperation with those noted above is given the highest of priorities to help ensure safe conditions and to eliminate workplace re-working, damage etc. issues.

All safety issues including the compilation of RAMS, implementation of SHE systems, on-site planning of work tasks and work-related matters are communicated to all parties

8.13 Duties of Contractors, Construction (Design & Management) Regulations

If / whenever LSG is engaged in a project on which the Construction (Design & Management) Regulations are applicable all necessary duties will be satisfied. All works will be suitably

managed, supervised and carried out, with all necessary training carried out by management, employees and contractors.

Where LSG are acting as principal contractor a suitable Construction Phase Health & Safety Plan and all necessary Risk Assessments will be compiled and circulated as required.

Lorne Stewart will ensure that all relevant instructions issued by the client or principal contractor are observed and ensure that suitable means of communication are established to inform all parties of relevant issues.

9.0 ACCIDENT REPORTING PROCEDURES

9.1 Accident Reporting

- All accidents must be reported to the immediate supervisor.
- The LSG 2-2-2 Accident Reporting Procedure must be observed in full following all accidents.
- The client / customer / principal contractor must be informed of all accidents in accordance with their published accident reporting procedure.
- All incidents involving "near miss" situations which could have resulted in an accident must be reported to the immediate supervisor (a near miss is an incident which could have resulted in injury to persons or damage to plant, equipment or property).
- The LSG SHEQ Department must be informed immediately if an operative is absent from work due to an injury sustained at work for a period in excess of three days (including weekends). These accidents will be fully investigated by the LSG SHEQ Department and the findings circulated to relevant persons.
- Unless to prevent further danger any plant, tool or equipment that is suspected of being the cause of, or connected with, an accident MUST NOT be interfered with until released by the immediate supervisor.
- Any correspondence received from solicitors acting on behalf of employees or third parties must be retained and the LSG SHEQ Department informed.
- Under no circumstances should such correspondence be acknowledged, notwithstanding the fact that it may contain words requesting written confirmation within 21 days.
- For data protection reasons, all information relating to accident reports must be forwarded in a sealed envelope marked as "Most Confidential".

9.2 Major Injury / Dangerous Occurrence Reporting

A fatality, major injury, or dangerous occurrence must be dealt with as follows:

- Notify the relevant emergency service by the quickest means possible.
- Notify client / customer / principal contractor as per site requirements.
- Notify project management / supervisor / Head of Department immediately.
- Notify the LSH SHEQ Department who will advise on the required actions.

These accidents will be fully investigated by the LSG SHEQ Department and the findings circulated to relevant persons

9.3 Accidents, Dangerous Occurrences and Occupational Diseases which must be reported Specified Injury

RIDDOR description:

The list of 'specified injuries' in RIDDOR 2013 replaces the previous list of 'major injuries' in RIDDOR 1995. Specified injuries are (regulation 4):

- fractures, other than to fingers, thumbs and toes

- amputations
- any injury likely to lead to permanent loss of sight or reduction in sight
- any crush injury to the head or torso causing damage to the brain or internal organs
- serious burns (including scalding) which:
 - covers more than 10% of the body
 - causes significant damage to the eyes, respiratory system or other vital organs
- any scalping requiring hospital treatment
- any loss of consciousness caused by head injury or asphyxia
- any other injury arising from working in an enclosed space which:
 - leads to hypothermia or heat-induced illness
 - requires resuscitation or admittance to hospital for more than 24 hours

Over-seven-day incapacitation of a worker

Accidents must be reported where they result in an employee or self-employed person being away from work, or unable to perform their normal work duties, for more than seven consecutive days as the result of their injury. This seven day period does not include the day of the accident, but does include weekends and rest days. The report must be made within 15 days of the accident.

Over-three-day incapacitation

Accidents must be recorded, but not reported where they result in a worker being incapacitated for more than three consecutive days. If you are an employer, who must keep an accident book under the Social Security (Claims and Payments) Regulations 1979, that record will be sufficient.

Non-fatal accidents to non-workers (e.g. members of the public)

Accidents to members of the public or others who are not at work must be reported if they result in an injury and the person is taken directly from the scene of the accident to hospital for treatment to that injury. Examinations and diagnostic tests do not constitute 'treatment' in such circumstances.

There is no requirement to report incidents where people are taken to hospital purely as a precaution when no injury is apparent

These accidents will be fully investigated by the LSG SHEQ Department and the findings circulated to relevant persons.

9.4 Dangerous Occurrences

These dangerous occurrences apply to all workplaces and include incidents involving:

- lifting equipment;
- pressure systems;
- overhead electric lines;
- electrical incidents causing explosion or fire;
- explosions, biological agents;
- radiation generators and radiography;
- breathing apparatus;
- diving operations;
- collapse of scaffolding;
- train collisions;
- wells and pipelines;
- pipeline works;
- structural collapses;
- explosions or fires;
- releases of flammable liquids and gases;

- Hazardous escapes of substances.

These incidents will be fully investigated by the LSG SHEQ Department and the findings circulated to relevant persons.

9.5 Occupational Diseases

Employers and self-employed people must report diagnoses of certain occupational diseases, where these are likely to have been caused or made worse by their work: These diseases include (regulations 8 and 9):

- carpal tunnel syndrome
- severe cramp of the hand or forearm
- occupational dermatitis
- hand-arm vibration syndrome
- occupational asthma
- tendonitis or tenosynovitis of the hand or forearm
- any occupational cancer
- any disease attributed to an occupational exposure to a biological agent.

These incidents will be fully investigated by the LSG SHEQ Department and the findings circulated to relevant persons.

10.0 EMERGENCY PROCEDURES & FIRST AID ARRANGEMENTS

10.1 Emergency Procedures

Emergency procedures will be agreed at all places of work. These will include, but will not be limited to:

- First aid / medical;
- Fire;
- Evacuation;
- Disaster response;
- Bomb threat response;

It is important that all personnel are made fully aware of:

- How to call for, and / or receive, assistance;
- How to raise the alarm in the event of fire, bomb warnings, or other emergency;
- The location of all exits from the premises;
- The identification and location of the assembly area(s);
- Various warning signals (if applicable).

Suitable and adequate fire protection equipment will be supplied by LSG with regard to accommodation and works to be carried out.

Persons trained in the use of firefighting equipment will be available at all site and office locations.

The equipment will be properly maintained and regularly tested.

10.2 First Aid Arrangements

Appropriate first aid equipment in line with HSE Guidance will be provided at every location.

All first aid boxes will be suitably marked and equipment will be appropriate to the anticipated site risk.

Details of location of equipment and first aiders etc. will be noted at site and office inductions.

Person(s) trained to the appropriate level of first aid will be employed at every site and office location, their names will be displayed in a prominent position.

11.0 WORKPLACE HAZARDS

A hazard is the potential for something to cause harm. This could be a substance, equipment, material, procedure, method of work, place of work, working environment, people etc.

The risk is the likelihood of the harm actually being realised and the degree of harm that is likely.

There are many hazards associated with the works undertaken by LSG employees. It is in everyone's interest to ensure that all risks are eliminated or reduced to the lowest practicable level, or that suitable control measures are instigated.

It is the responsibility of all persons to be constantly vigilant and aware of the risks associated with their work and to always work in a safe and responsible manner.

Common hazards at the workplace may include but not be limited to: Poor housekeeping, excessive noise, extremes of temperature, poor ventilation, obstructed walkways, holes / trenches / excavations, unsecured ladders, working above / below ground, hazardous atmospheres, hot work, electricity, hazardous substances, inadequate lighting, door access / egress, high fume / dust levels, wet / slippery / insecure floors, falling objects, poor edge protection, confined spaces, live services, damaged / unsuitable tools, commissioning / testing, poor storage, other trades.

Risks associated with these hazards must be reduced to the lowest practicable level and appropriate safe systems of work and / or control measures implemented.

Where risks are identified they must be dealt with or reported to supervision for action as soon as possible.

11.1 Housekeeping

Housekeeping is one of the most important single items influencing safety at the workplace.

- All stairways, passages, and gangways must be kept free from materials, supply leads and obstructions of any kind.
- Materials and equipment shall be stored tidily so as not to cause obstruction and kept away from the edges of hoist ways, ladder access, stairways, floor openings and riser shafts.
- When protruding nails are found in re-usable boards, planks or timber they must be removed. Protruding nails in scrap timber should be bent flush, hammered in or removed so as not to create a hazard to others.
- Tools must not be left where they may cause tripping or other hazards. Tools not in use should be placed in a tool belt or bag and at the end of each working day be placed in a secure container.
- Working areas must be kept clean and tidy. Redundant materials, scrap or other rubbish must be removed regularly into designated containers or disposal areas. A tidy-as-you-go policy should be adopted.
- Canteens and site accommodation must be kept clean. Do not allow soiled clothes, scraps of food etc. to accumulate, especially around hot pipes or heaters.
- Spillage's of oil or other substances must be contained and cleaned up immediately. Ground contamination must be prevented.

- All flammable liquids, LPG and gas cylinders must be stored properly in accordance with the relevant legislation.

11.2 Working at Height

Falls from height are recognised as the major cause of fatal and serious injury within the construction industry.

When considering working at height, a risk assessment must be undertaken in order to identify what the hazard is and the degree of risk present.

It is essential that details of any risk assessment carried out are communicated to both the person(s) undertaking the work and any others who may be at risk, all persons involved in the task must be briefed on the assessment and sign the appropriate risk assessment communication form.

There are a number of items of equipment, which may be used to carry out work at height. It is important that careful consideration is given to the working environment and the selection of the most appropriate access method and equipment.

Mobile Scaffold Towers (MST) must be erected by suitably trained personnel and as specified by the manufacturers build guide.

Mobile Elevating Work Platform (MEWP) must only be operated by trained personnel and as specified in the manufacturer's operation guide.

Podium steps should be used where access is limited. The manufacturer's instructions must be followed when erecting, using or dismantling this equipment.

Stepladders will only be used for work at height if a suitable risk assessment has been carried out and demonstrated that the use of more suitable work equipment is not justified because of the low risk and the short duration of use or existing features on site which, cannot be altered.

All work at height must also comply with the Clients or Principal Contractors policy.

11.3 Office Safety

Although offices are relatively safe places of work, common hazards in the office environment may include but are not limited to:

Obstructed walkways / stairways, unsuitable clothing, unauthorised electrical equipment, spills on / wet floor, keys in furniture locks, unstable filing cabinets, poor cable management, carrying / lifting / moving objects, cluttered workstations, damaged furniture, poor storage, open drawers, unguarded guillotines, unsuitable / defective lighting, poor seating posture, poor housekeeping.

Display Screen Equipment (DSE) must be assessed for suitability, comfort and working environment by the user on a DSE User Self-Assessment of Workstation Checklist and where applicable by the unit assessor on a DSE Assessors Checklist. Defects must be rectified as soon as possible.

11.4 Electricity

All electrical work must be carried out in accordance with the LSG Electrical Safety Rules.

Electric shock is a major hazard. It can cause physical injury and can kill. The passage of current through the body can cause burning of the skin at the point of contact and underlying tissue. Severe burns can also occur from exposure to a flash over without actual bodily contact.

Hazards can be caused by:

- Poor / damaged insulation on power tools, cables etc.
- The use of unauthorised extension leads.
- Knowingly using defective electrical equipment.
- Misuse of electrical equipment.
- Incorrect fuse replacement.
- Failure to isolate circuits.
- Poor installation – using ‘borrowed’ neutrals.
- The deliberate bypassing of safety devices.
- Ignorance or disregard of safety regulations / codes of practice / permits to work / risk assessments.
- Not working to an agreed Method Statement.
- Energisation of circuits before the electrical system is complete.
- Careless working on batteries / battery banks / U.P.S. Systems.
- Failure to notify all personnel of work being carried out on a circuit affecting them.
- The use of unauthorised testing equipment and tools.
- Ineffective or no screening around electrical welding activities and / or equipment.
- The use of incorrect fire extinguishers.
- Knowingly working on live electrical systems.

Basic Safety Rules – Working with Electricity:

- Only qualified, competent, trained and authorised persons may work on any electrical systems that have previously been energised.
- It is not necessary to work on live electrical systems except for testing and commissioning operations or other activities controlled by a formal permit to work.
- On any distribution board that can be energised, the sub circuit cable ends must not be connected until the outgoing circuit is complete.
- Always use agreed and understood formal isolation and lock-off procedures.
- Before commencing work always test before touch by using a proven operational test instrument, even if a system is declared dead on a permit to work.

11.5 Site Traffic

All employees must remain aware to the hazards created by site traffic. Every year people are seriously injured on construction sites as a result of vehicle accidents, the most common cause of these accidents are:

- People being hit by vehicles.
- People falling from vehicles.
- Objects falling from vehicles on to people.
- Vehicles toppling over.

In order to help reduce accidents the following rules must be observed,

- All employees must be vigilant and remain aware of site vehicles.
- Hi visibility jackets or vests must be worn at all times.
- Listen out for audible reversing warnings.
- Do not encroach into excavator slewing circles, or below a tower or mobile crane slung load.
- Always signal to the driver, and await a response before approaching a vehicle.
- Always ensure that pedestrian routes are used and site roads are only crossed as directed at designated crossing points.

- Where required a trained banksman will direct traffic and control pedestrian movements as required.

11.6 Protection of the Public

All works where there is an interface with members of the public or clients' staff will be strictly controlled. Adequate information will be made available to all relevant parties and on-going liaison will be encouraged and where appropriate documented. For short-term work adequate warning signage and barrier protection will be erected.

11.7 Welfare Arrangements

Whenever LSG is responsible for welfare arrangement the responsibilities included in the CDM Regulations must be observed. Adequate sanitary, washing facilities, drinking water, accommodation for clothing, facilities for changing clothing and facilities for rest must all be considered. Site supervision will regularly review facilities supplied by others to ensure adequate standards are in place, where this is not the case the client / customer / principal contractor must be requested to make the necessary improvements.

11.8 New Hazards

LSG SHEQ Department personnel are available to investigate and advise on hazards associated with the introduction of new plant, equipment, processes or methods. Additional training may be necessary and suitable arrangements made.

11.9 Maintenance Hazards

Hazards may be present and cause a problem to those carrying out servicing / maintenance on works, which we have installed and handed over. All hazards must be documented and included in the Health and Safety File relating to the project, which is handed to the client at project completion.

11.10 Mobile Phones

For reasons of site safety, the use of mobile phones within construction areas will be limited to LSG issue phones only. All private mobile phones will be switched off and not used within these areas. Where a call is received on a LSG issue phone it will only be answered if it is safe to do so, and the call duration will be kept to a minimum.

11.11 Confined Spaces

The LSG SHEQ Department must be contacted prior to entry into any area, which, is designated as a confined space, or site supervision suspect is a confined space. Only trained competent and authorised employees will enter any designated confined space. A thorough assessment will be made and appropriate advice in relation to permits, emergency procedures, PPE and all other relevant issues.

11.12 Asbestos

Duty holders have an obligation to manage the risk from asbestos in non-domestic premises, by ensuring that a suitable and sufficient assessment is carried out as to whether asbestos is likely to be present in the premises. In the vast majority of cases the principal contractor or client would be the main duty holder.

There is also a duty to inform all persons likely to disturb it of the outcome of the assessment.

Site management must ensure that if asbestos is suspected written confirmation is obtained in the form of an analytical report or clean air certificate (this information must be in a format which, is

understood by site management) prior to LSG or sub-contract employees commencing works in the area.

12.0 HEALTH HAZARDS

12.1. Hand-Arm Vibration Syndrome (HAVS)

Affects some individuals who use machinery that generates vibration e.g. handheld grinding / chasing / percussion drilling tools.

Prevention is essential.

Keep hands dry and warm at all times – gloves may be helpful; ensure drill bits are kept sharp; and equipment is properly maintained.

Symptoms of HAVS are indicated by tingling, blanching and numbness of the fingers. If these symptoms occur and persist, report them to your supervisor and cease use of the equipment.

Information on the precautions, which, must be taken when using vibrating equipment, is available from site supervision.

12.2 Noise

Induced hearing loss affects people who are exposed to high noise levels for prolonged periods; it is irreversible.

Prevention is essential.

LSG will reduce noise levels, within our sphere of activities, to the lowest reasonably practicable level.

Suitable hearing protection will be provided and worn on all projects when operating powered tools or equipment.

12.3 Beat Knee / Elbow

Beat knee / elbow is the build-up of fluid around the joint, which causes discomfort and restricts movement. It is caused by severe or prolonged external friction or pressure at or about the joint, e.g. using the knee as a fulcrum when bending pipe or prolonged activities in a kneeling position, or repetitive prolonged use of

hand bending machines. Kneepads are available from supervision and must be worn when work requires prolonged kneeling. Pipe bending machines should be used whenever practicable.

12.4 Dust Inhalation

Dust is a major health hazard and may cause a number of conditions, e.g. Irritation to the respiratory passages causing coughing and tightness of the chest; asthma; eczema and lung disease. Much depends on the length of exposure and the source, size and structure of the particulate. Prevention is the best policy. Whenever carrying out dust producing activities or working in an area where dust is suspended in the air dust extraction must be considered in the first instance. Suitable respiratory protection must be provided and worn as / where required.

Should you suffer any pain or discomfort as a result of any work activities you should cease all activities immediately and inform your Supervisor.

12.5 Smoking/Vaping

The health dangers of smoking and vaping via tobacco based products or electronic devices are well known. As such, LSG does not allow any Staff or Operatives to smoke, vape or use electronic inhalation devices in any Lorne Stewart offices, workshops or construction welfare facilities. Compliance will be constantly monitored by Line Managers.

12.6 Health Surveillance

Staff and employees have access to private health care, guidance relating to medical assessments or treatment can be obtained from the LSG SHEQ and Human Resources Departments, information is also available in the LSG Occupational Health Policy document.

Client / customer / principal contractor policy may require additional input this should be reviewed on a project requirement basis.

12.7 Occupational Health

LSG engages the assistance of a professional external agency to address occupational health issues. Guidance on this matter is available from the LSG SHEQ and Human Resources Departments, information is also available in the LSG Occupational Health Policy document.

Where deemed necessary i.e. for safety critical workers, medicals, health screening and health surveillance will be carried out as appropriate.

13.0 EMPLOYEE ISSUES

13.1 Competency of Employees

It is LSG policy to ensure that only persons who are trained, authorised and competent shall undertake work within the limitations of the level of their expertise with due regard to the awareness of the hazards associated with that work.

Competency attainment levels are assessed by various means – both internal and external, e.g.:

- Apprenticeship completion.
- National Grading Attainment.
- National Registration bodies.
- External examinations.
- Membership of professional institutions.
- Educational qualifications.
- Attendance and passing specific training courses.
- Regular internal reviews.
- Appraisals and assessments.
- Relevant experience.

In addition to the above all LSG and sub contract employees who are site based or regularly attend site will possess and carry the relevant Construction Skills Certification Scheme (CSCS) card.

13.2 Workforce Consultation

LSG recognises the importance of involving the workforce on health and safety matters. Regular safety talks will be carried out on all sites where the opportunity for discussion on these matters will be encouraged. In addition to this Safety Bulletins and other communications will be produced and issued to all staff. Regular Regional Communications Meetings are also held where safety is an agenda item.

All employees will also be encouraged to complete Safety Observation Cards which are available in booklet form or on-line, whenever a potentially hazardous situation or high safety standards are noted.

13.3 Refusal to Work

“All employees are empowered to stop any work activity that they feel is unsafe”

All employees have a duty under the Management of Health and Safety at Work Regulations to report unsafe working conditions or equipment to their employer.

Any employee who honestly considers that his / her health and / or safety are being unnecessarily or unreasonably threatened by an unsafe work practice, location or environment has the right to stop work and request remedial action to eliminate or reduce the perceived risk.

The concern will be investigated by an appropriate member of the site management team, principal contractor, client or member of the LSG SHEQ Department as necessary. If viewed as justified the situation will be reviewed and the level of risk reduced to an acceptable level.

If it is considered that the complaint is not justified the responsible person must explain or demonstrate that the level of risk is acceptable and then require that work continues.

If agreement cannot be reached then the complainant should vacate the work area and contact the Human Resources Department for further advice and instructions.

Refusal to work on the grounds of concerns over issues relating to Health & Safety is a key component of the LSG Health & Safety procedures. Persons invoking this will be supported by LSG and are protected from any associated disciplinary action provided that it can be demonstrated that there was a genuine and reasonable cause for concern.

13.4 Migrant / Non-English-Speaking Workers

An assessment must be made regarding the suitability of all general health and safety requirements and the ability to read or understand the English language of any migrant or non-English speaking worker. For health and safety reasons no non-English speaking worker will be employed on an individual basis, an assessment will also be made with regard to the ratio and working areas of English speaking to non-English speaking workers. All migrant / non-English speaking workers must abide by the LSG policy regarding CSCS and similar schemes.

14.0 VEHICLE SAFETY

All persons driving vehicles on LSG business are required to operate vehicles in accordance with the following;

- All provisions of the Road Traffic Act & the LSG Road Safety Rules.
- The LSG Road Safety Rules must be read in conjunction with the Highway Code.
- The LSG Road Safety Rules contains information on:
 - Risk Assessment.
 - Mobile Phones.
 - Vehicle Maintenance and Security.
 - Winter Driving.
 - Notifiable Medical Conditions.
 - Vehicle and Driving Offences.

15.0 SAFETY TRAINING

All safety-training requirements must be authorised by the relevant Regional Director or Head of Department.

All managers, supervisors and persons who have a safety responsibility for others are required to have a level of safety knowledge and awareness relevant to their role. Attendance at a suitable course(s) is arranged to enable the individual to discharge their responsibilities in a safe and responsible manner.

Specific training given to:

- Users of mobile elevating working platforms (MEWP).
- Users of lifting equipment and fork lift trucks etc.
- Those required to mount abrasive wheels.
- Persons who build, alter or dismantle mobile scaffold towers (MST).
- Those required to work in hazardous atmospheres, confined spaces, etc.
- Those required to work to a specific Permit to Work and / or Risk Assessment.
- Persons who will be required to use any new plant or machinery or carry out any new process.
- Personnel using display screen equipment.
- Those having to carry out works in the railway environment.
- Other identified safety training requirements will be addressed as required.

The majority of the LSG workforce is technical and / or apprentice trained and safety is an integral part of their training programme.

All employees will receive thorough safety training to ensure that they comply with the requirements of their appropriate trade skill card.

All personnel including temporary workers and sub-contract companies must receive suitable and adequate induction training at every workplace to ensure that they are made aware of the type of work to be undertaken, the risks associated with the work and the workplace, and the control measures that are in place to minimise the risks.

Safety talks are regularly carried out on sites by site supervisors and the LSG SHEQ Department to promote safety awareness and safe working practices, and to encourage employee participation in health, safety, welfare and environmental matters.

16.0 SUB-CONTRACT COMPANIES

LSG requires a high standard of safe working from its employees and enjoys a good reputation with its clients in this respect. An equally high standard is expected from its sub-contract companies.

Sub-contract companies and their employees will abide by all instructions and restrictions detailed within the LSG SHE Policy.

LSG reserves the right to continually improve any policy, which, in their opinion would benefit site safety or environmental issues. It will be the responsibility of sub-contract companies to meet any associated costs.

Sub-contract companies must at all times be adequately insured for any Common Law damages that may occur and must hold current Public and Employers Liability Insurance.

Sub- contract companies will ensure that adequate supervision is made available on all projects, to enable supervision of work tasks, control of quality and production and compilation of statutory safety documentation as required by the LSG SHE Management Systems.

Sub-contract companies will receive copies of the LSG SHE Policy, which must be observed together with all provisions of the Health & Safety at Work etc. Act 1974 and all other applicable safety legislation, site rules and construction phase plan.

A Sub-contract Safety, Health, Environment & Quality evaluation must be completed to allow the evaluation of SHEQ awareness.

When required by LSG, evidence of risk assessments and method statements must be supplied for perusal / approval. If found unacceptable, they must be suitably reviewed and modified prior to work commencement.

In the event that sub-contract employees do not demonstrate an acceptable level of compliance they will be treated in a manner identical to an employee for all safety related matters. This will include re-induction on site accompanied by a senior employee of LSG; any associated costs will be borne by the sub-contractor.

All equipment intended for use must be in good order, to industry standard and accompanied by the relevant test, calibration or inspection certification.

Sub contract companies must be aware of and abide by their duties with reference to the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations.

All accidents and injuries must be reported to the LSG senior person on site immediately.

Full information relating to all work to be carried out must be submitted to LSG for inclusion in the Safety Plan to ensure good liaison and co-ordination of work tasks.

Sub-contract companies will receive full and adequate induction training relating to the workplace. Sub-contact companies must ensure that people, other than those employed by them, are not exposed to health and safety risks caused by their work activities.

Suitable and adequate personal protective equipment (PPE) must be provided by sub-contract companies for all aspects of their work. LSG will not provide PPE to sub-contract employees

Relevant CoSHH Assessments must be submitted to LSG.

Sub-contract companies must ensure that an assessment is made regarding all general health and safety requirements and the ability to read or understand the English language of any migrant or non-English-speaking worker. For health and safety reasons no non-English speaking worker will be employed on an individual basis, an assessment will also be made with regard to the ratio and working areas of English speaking to non-English speaking workers. All migrant / non-English speaking workers must abide by LSG policy regarding CSCS and similar schemes.

Sub-contract companies must ensure that all their employees are trained to relevant trade standards including Construction Skills Certificate Scheme (CSCS), Plant Training Certificates, Mobile Scaffold Tower, Abrasive Wheel Changing, etc. Where sub-contract employees are found to be lacking in such training, work will not commence until all requirements are met. LSG reserve the right to counter charge for associated costs accrued should any sub-contract employee be lacking in the required training or certification.

In the event that an operative engaged by a sub-contractor should need to be removed from one of LSG's sites, by either LSG, the principal contractor or client for safety infringements the sub-contractor will not be permitted to place this individual on another LSG project at which they are carrying out works or providing services until such time that the representatives of LSG are satisfied that the safety performance of the operative has been assessed, and that steps have been taken to improve performance so that a similar issue will be avoided.

17.0. TEMPORARY WORKERS (AGENCY PERSONNEL, ETC)

LSG requires a high standard of safe working from its employees and enjoys a good reputation with its clients in this respect. An equally high standard is expected from its temporary workers.

All temporary workers will receive induction training and will be informed of their responsibilities with regard to LSG SHE Policy, which they must understand and observe, together with all relevant statutory provisions and site rules.

Labour Agency companies must ensure that all their operatives are in position of a current and suitable Construction Skills Certificate Scheme (CSCS) card and are qualified to relevant trade standards.

Labour Agency companies will ensure that an assessment is made regarding all general health and safety requirements and the ability to read or understand the English language of any migrant or non-English-speaking worker. For health and safety reasons no non-English speaking worker will be employed on an individual basis, an assessment will also be made with regard to the ratio and working areas of English speaking to non-English speaking workers. All migrant / non-English speaking workers must abide by LSG policy regarding CSCS and similar schemes.

Temporary workers will be treated in the same way as directly employed employees with regard to health, safety and welfare matters.

In the event that an operative engaged by a sub-contractor should need to be removed from one of LSG's sites, by either LSG, the principal contractor or client for safety infringements the sub-contractor will not be permitted to place this individual on another LSG project at which they are carrying out works or providing services until such time that the representatives of LSG are satisfied that the safety performance of the operative has been assessed, and that steps have been taken to improve performance so that a similar issue will be avoided.

18.0 ENVIRONMENTAL POLICY STATEMENT OF INTENT

Lorne Stewart Group recognises the important role that its work activities have in helping to protect the environment.

We are committed to high quality design, installation, commissioning and maintenance of engineering and we will strive to minimise waste and the environmental footprint associated with our work activities.

This statement is a declaration of intent on behalf of the Directors of the Group to establish and maintain a progressive and proactive approach to achieving these objectives.

Principles

The following main principles provide the foundations on which delivery of this policy is based.

- Compliance with legal, client, trade organisation etc. requirements and best practice
- Supporting and cooperating with customers to help them achieve their environmental aims
- Prevention of pollution
- Reduction of waste – materials and resources
- Use of environmental performance evaluation procedures and associated indicators
- Design engineering solutions to minimise impact on the environment
- Life cycle analysis of our solutions
- Continuous improvement, employee engagement and training
- Minimal environmental impact to adjacent neighbours
- Encourage use of Environmental Management Systems by supply chain and sub-contract companies
- Collaboration with all our stakeholders to achieve the above

Lorne Stewart Group senior management is committed to the implementation of this policy and will give full support to those authorised to carry it out. Lorne Stewart Group will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy and effectiveness.

Employees of the Group are expected to fully support the objectives stated above. The highest possible standards in this area must be achieved and maintained as part of the Group strategy to pursue excellence in all that it does.

This statement of intent will be made available to all employees and other interested parties and will be displayed within Group premises. It will be reviewed annually or following any changes to relevant legislation or Group policy.



P Briars

CEO Lorne Stewart Engineering

Jan 2024