

# Health, Safety and Environmental Policy

August 2024



## Document Control

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## Part 1 – Introduction and Statement

### Introduction

This Health, Safety and Environment Policy aims to promote the [Health and Safety at Work etc. Act 1974](#) (HASAWA) and its subsequent Regulations, Approved Codes of Practice, Guidance Notes and Standards providing a comprehensive legislative framework to promote, stimulate and encourage high standards of Occupational Health, Safety and Welfare.

John F Hunt Regeneration, hereon referred to as the 'Company', has as part of its Safety and Environment Management Systems developed [ISO14001](#) and [ISO45001 Legal Compliance and Evaluation Registers](#) incorporating current regulations, standards, Approved Codes of Practice and other relevant information and identifies the means by which the Company evaluates compliance to the above.

The Health, Safety and Environment Policy is developed in accordance with the Health and Safety Executive Guidance [HSG 65:2013 Managing for Health and Safety](#). To ensure that all Safety Procedures and requirements within this Policy remain compliant, these will be continually monitored, reviewed and improved through communication and co-ordination with all relevant parties.

The Company has set objectives to meet the requirements of HSG 65:2013 by:

- **PLAN:** Determining procedures for the safe undertaking of all Company related activities and recording these within the Company Safety Management System (SMS);
- **DO:** To undertake all Company related activities in such a manner as to eliminate or minimise the risk of preventing injury and ill health to our Employees and others not in our employment and controlling those risks through the implementation of effective control measures. Ensuring the effective communication of those control measures to those undertaking the works;
- **CHECK:** To identify performance by continuously monitoring the implemented control measures through inspections, internal and external audits, and investigating any observations or non-conformances;
- **ACT:** Review performance and identify improved methodology to ensure continual improvement.

This Policy aims to promote proactive safety management to reduce reactive responses and transition from safety legislation governance to a safety culture via communication, co-operation, participation, information and coordination so ensuring we continue to prevent ill health and injury to all our Employees and those who may be affected by our activities.

This policy embeds our commitment to the following [UN Sustainable Development Goals](#):



## Health and Safety Policy Statement

John F Hunt Regeneration are a multi-disciplined team working to ensure the provision of a range of regeneration solutions, including but not limited to: Soil and Groundwater Remediation, Water Technologies, Dismantling and Enabling Works.

### We are committed to:

- providing safe and healthy working conditions for the prevention of work-related injury and ill health.
- fulfilling our legal requirements and other requirements.
- eliminating hazards and reducing occupational health & safety (OHS) risks, as far as is reasonably practicable,
- providing the necessary resources to achieve our health and safety obligations and commitments,
- consulting and involving our workforce in health and safety,
- to not allowing other business objectives to compromise our health & safety objectives, and
- to continual improvement of the OHS management system.

### We have an established a management system that is in-line with ISO45001:2018, to deliver the above commitments, with the objective to:

1. Risk assess our activities and produced agreed risk control measures to eliminate and minimise risk as far as is reasonably practicable.
2. Understanding external and internal requirements and implementing them.
3. Identifying emergency situations, reducing the likelihood of them occurring and preparing for occurrence.
4. Provide training, supervision, and information to ensure employees are competent to perform their work safely and efficiently.
5. Providing technically sound work equipment, and safe and healthy working conditions.
6. Ensuring that outsourced activities are controlled and that sub-contractors are competent.
7. Ensuring that when working we ensure coordination, communication, care, custody, and control.
8. Reviewing the performance and effectiveness of the OHS Management System.
9. Delivery of continual improvement through improvement plans and control of non-conformity.

### Our employees, and others working upon our behalf, have a duty to co-operate in the operation of this policy by:

- ✓ Working safely and efficiently.
- ✓ Using the protective equipment provided and by meeting statutory requirements.
- ✓ Reporting incidents that have led or may lead to injury or damages.
- ✓ Adhering to complaint procedures jointly agreed on their behalf for securing a safe workplace.
- ✓ Assisting in the investigation of accidents with the objective of introducing measures to prevent a recurrence.

We have established OHS objectives to achieve the above commitments which are regularly monitored by the management team.

We review the effectiveness and adequacy of this OHS policy on an annual basis and as part of change planning, lessons learnt, knowledge transfer or following an OHS incident or other failure to meet our OHS objectives.

We communicate our OHS policy to all interested parties. This policy is displayed on company premises, presented at new employee induction, displayed in any fixed construction sites under our control, and made available upon request from interested parties.

As the individual with ultimate responsibility for OHS at John F Hunt Regeneration, I approve this OHS policy,

Signed



**Ben Williams**  
**Chief Executive Officer**  
August 2024

## Part 2 - Health & Safety Roles and Responsibilities

Those with designated roles within the Company holding responsibilities for Health and Safety on sites and Company premises are identified as follows:

### Board of Directors

The Company Board of Directors has overall responsibility for Health & Safety and has appointed the Associate Director HSEQ to provide competent advice and support to help the Board implement the measures they need to take to comply with legal requirements.

The Board holds the ultimate responsibility for the Health and Safety of not only its Employees, but all employed Subcontractors and members of the public who may be affected by the activities of the Company and its acts or omissions. It is also responsible for ensuring that the activities of Company do not have an adverse impact on the Environment and for implementing the requirements of this policy.

These responsibilities cannot be relinquished, duties are designated to others to assist them in meeting their obligations and ensuring the Company's commitment to Health and Safety is of the highest priority under current Health, Safety and Environmental Legislation by providing:

- Safe systems of work and safe places of work;
- Safe access and egress to and from places of work;
- Competent management and supervision;
- Experienced and competent Employees;
- Suitable training, information and instruction for all Employees;
- Safe storage, transportation, handling and use of articles and substances;
- Safe plant, equipment and tools;
- Suitable and sufficient welfare facilities and arrangements for welfare at work;
- Means of controlling the emission of offensive substances;
- Ensuring Employee consultations on all matters relating to Health and Safety are undertaken and documented;
- Management of the occupational health of all Employees through medical surveillance, monitoring and review via the appointed occupational Health and Safety resources;
- Monitoring, reviewing and continuous improving of Policies, Procedures and safety performance;
- Revising and updating of the policy on an annual basis or as legislation changes.

### Managing Directors – Industrial Dismantling & Demolition and Remediation

The Managing Directors' report directly to the CEO. Their roles aid in discharging the Employer's responsibilities where necessary along with the implementation of this Policy and will:

- Ensure that arrangements for the Health and Safety of those employed under their directorship are made known, maintained and reviewed whenever there is a change of operation or location;
- Provide on-going commitment and leadership to continuous improvement in Health and Safety and lead by example;
- Assist with the development of the collective vision and direction necessary to comply with and exceed where possible the relevant statutory provisions;



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- Ensure that directly reporting staff are provided with appropriate support, guidance and resources to enable them to discharge their Health and Safety duties;
- Compliance with current management systems certificated to ISO9001, ISO14001 and ISO45001;
- Understand their roles and responsibilities for Health and Safety.

### Directors – Operations/Commercial

The responsibilities of Directors are to:

- Ensure that arrangements for the Health and Safety of those Employees under their directorship are made known, maintained and reviewed whenever there is a change of operation or location;
- Provide on-going commitment and leadership to continuous improvement in Health and Safety and lead by example;
- Assist with the development of the collective vision and direction necessary to comply with and exceed where possible the relevant statutory provisions;
- Ensure that directly reporting staff are provided with appropriate support, guidance and resources to enable them to discharge their Health and Safety duties;
- Ensure that directly reporting staff are provided with appropriate support, guidance and resources to enable them to fulfil their Environmental responsibilities – e.g., preventing pollution from emissions to land, air and water, assessing aspects and impacts, producing Site Environmental Management Plans, etc;
- Ensure they understand their roles and responsibilities for Health and Safety and the Environment;
- Compliance with current management systems certificated to ISO9001, ISO14001 and ISO45001;
- Notify new projects starting using the project notification form and distributed;
- Ensure all personnel are trained and competent for their roles onsite.

### Associate Director – Health, Safety, Environment & Quality (HSEQ)

Will provide advice and assist on behalf of the Employer with:

- Providing competent advice and support to help the Board understand and implement the measures they need to take to comply with legal requirements;
- Advise and assist with the development and review of all Company Policies, Procedures, Standards and Documentation to ensure compliance and continual improvement of registrations, certificates and memberships;
- Advise and assist staff with discharging their Health, Safety and Environmental duties;
- Compliance with current management systems certificated to ISO9001, ISO14001 and ISO45001;
- The approval of external providers;
- Senior management tours, inspections and internal audits;
- Attend external audits;
- Suitable coordination, consultation and communication between all groups of Employees;
- The circulation of relevant safety information to all Directors and Company Employees where required;

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- Investigations of notifiable accidents or incidents and reporting requirements under RIDDOR. Liaison with all relevant parties. Ensuring that the Company Finance Director is notified to advise the Company insurers;
- As a means of continual improvement, the maintenance and analysis of all Health and Safety related information to determine future training needs, required changes in procedures or equipment. Subsequently reporting and making recommendations to the Company Directors and Site Management on all matters relating to Health and Safety issues;
- Ensure they keep knowledge up to date so far as is reasonably practicable relevant to the business of the Company through regular training and sources of information such as Health and Safety Executive website and seminar attendance and other sources of media;
- Maintain Continual Professional Development (CPD) through their various memberships as required;
- Investigation of any refusal to work on the grounds of health and safety made by any site Employee or Subcontractor which has been notified to them by Site Management, or other person;
- Investigate any issue raised under the Company Occupational Health and Drug and Alcohol Management Policy;
- Ensure training is at the correct level on sites for individuals to carry out their roles under legislation.

### Health and Safety Advisor

In addition to Company Employee responsibilities, they will provide advice and assist on behalf of the employer with:

- Ensuring compliance in accordance with current regulations, company policies and accreditations by undertaking regular site safety inspections and producing written reports for submission to the Site Management and Company Directors for their attention;
- Provide competent advice relating to Health, Safety and Environmental issues to Site Management and Company Employees as required;
- Undertake regular HSE inspections of sites as directed by the Operations Director using the [Site HSE Inspection Report](#);
- Compliance with current management systems certificated to ISO9001, ISO14001 and ISO45001;
- Ensure that they are continuously aware of the latest Safety and Environmental Legislation relevant to the business of the Company through regular training and any seminar attendance;
- Attend meetings as requested by Senior Management;
- Provide suggestions for improvement to systems and procedures to benefit the Health, Safety, Environment and Quality of the Company;
- Ensure the security of all Company documentation relating to Health, Safety, Environment and Quality;
- Ensure Employees are trained to a level to meet legislation for the roles that they carry out.

### General Manager – Water Technologies

- Have knowledge of the Company IMS Standards, Policies, Procedures and the associated documentation and ensure that Site Management are following these processes;

- Ensure that arrangements for the Health and Safety of those employed under their management are made known, maintained and reviewed whenever there is a change of operation or location;
- Ensure that directly reporting staff are provided with appropriate support, guidance and resources to enable them to fulfil their Environmental responsibilities – e.g., preventing pollution from emissions to land, air and water, assessing aspects and impacts, producing Site Environmental Management Plans, etc;
- Provide on-going commitment and leadership to continuous improvement in Health and Safety and lead by example;
- Assist with the development of the collective vision and direction necessary to comply with and exceed where possible the relevant statutory provisions;
- Ensure that directly reporting staff are provided with appropriate support, guidance and resources to enable them to discharge their Health and Safety duties;
- Compliance with current management systems certificated to ISO9001, ISO14001 and ISO45001;
- Understand their roles and responsibilities for Health, Safety and the Environment.

## Operations Manager

- Have knowledge of relevant Health and Safety, Environmental and Asbestos legislation and are competent in communicating this to Site Operatives;
- Have knowledge of the Company IMS Standards, Policies, Procedures and the associated documentation and ensure that Site Management are following these processes;
- Ensure that all projects are resourced with competent, trained personnel to carry out the works in accordance to Company, legislative and accreditation standards requirements;
- Prior to any project commencing all relevant surveys, notices, documents, procedures, filing system, registers and information relating to site Health, Safety and Environmental management have been prepared, communicated and made available to the Site/Project Manager;
- Ensure adequate provision of welfare facilities on site throughout a project and they are maintained in a condition in accordance with current legislative and Company requirements;
- Ensure that Sites are adequately provided with First Aid, Fire, Environmental and emergency resources, including trained and competent personnel;
- Ensure all temporary works are managed by the appointed temporary works representatives in accordance with [SMS019 Temporary Works Management Procedure](#);
- Liaising with the Health, Safety and Environmental Team to carry out a full investigation of any right to refuse to work on the grounds of safety by a Company or Subcontracted Employee which has been notified to them;
- Liaising with the Company Health, Safety and Environmental Team to assist in any notifiable accident or incident investigation and liaison with any Enforcement Agency involved;
- If there are any notifiable asbestos works planned, then an Asbestos Plan of Work and Risk Assessments are in place and the requirements of the licensed contractor have been fulfilled prior to the works starting;
- Provide guidance, support and resources to Site Management as required.
- Ensure that operations handovers have been fully managed and documented using the [Handover of Operations Report](#) and that sufficient support is given to new, or temporary Site Management.

## Rail Projects Operations Manager/Competent Person

For rail projects a named competent person will ensure or undertake on behalf of the Employer the same duties as the above Operations Manager including those outlined below.

When the Company undertakes work on the Network Rail or London Underground Infrastructure the rail projects contracts manager/competent person based upon their extensive rail shall ensure the following are undertaken to determine any imported risk is reduced to a minimum:

- Ensuring Company, Health, Safety, Environmental and Quality meets Network Rail and/or London Underground requirements and their Safety and Environmental requirements and procedures are included in our works;
- Ensuring information such as Work Package Plans, Task Briefings, etc. are briefed and recorded;
- Ensuring rail related site inductions are carried out and recorded;
- Ensuring adequate welfare facilities are available;
- Ensuring work package risk assessments and method statements not only consider company requirements but also rail related standards and codes of practice;
- Ensuring training of personnel for Network Rail and London Underground Safety Critical posts is achieved in liaison with the Training Manager;
- Ensuring that at the planning stage the means of protection of staff when working "on or near the line" in accordance with the requirements of the Rule Book and Safety of persons working on or near the line standard is considered;
- Ensuring plant and equipment requirements conform to Network Rail and London Underground requirements for working on their Infrastructure;
- Ensuring accident, incident and near hits are correctly reported to the ISC and that action is taken to prevent a recurrence;
- All works are adequately planned to consider all Network Rail and London Underground requirements for working on their Infrastructure;
- All Network Rail and London Underground document procedures are included as a part of the project planning and complied with as the works proceed;
- Assisting the Company Safety Management in any rail related safety or environment incident;
- Assisting the Company Safety Management in all rail related requirements.

## Technical and Remediation Manager

- Have knowledge of relevant Health and Safety, Environmental and Asbestos legislation and Company IMS Standards, Policies, Procedures;
- Undertake COSHH assessments as required and in accordance with the Company [COSHH Management Policy](#);
- Conduct regular CoTC inspections as directed and maintain their WAMITAB accreditation;
- Understand their roles and responsibilities for Health, Safety and the Environment.
- Fulfil and assist others in their Environmental responsibilities – e.g., preventing pollution from emissions to land, air and water, assessing aspects and impacts, producing Site Environmental Management Plans, etc;
- When undertaking any section of works on a site, e.g. trial pitting which require safe systems of work, such as RAMS, or when stepping up to provide site cover then refer to the responsibilities of the Site and Project Manager as detailed below.

## Environmental/Remediation Scientist

- Have knowledge of relevant Health and Safety, Environmental and Asbestos legislation and Company IMS Standards, Policies, Procedures;

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- When undertaking any section of works on a site, e.g. trial pitting which require safe systems of work, such as RAMS, or when stepping up to provide Site cover then refer to the responsibilities of the Site and Project Manager as detailed below.

### Site Supervisor

- Have knowledge of relevant Health and Safety, Environmental and Asbestos legislation and Company IMS Standards, Policies;
- Support the Site, or Project Manager in delivering sections of works and operations within safe systems of work, as detailed below, and have a thorough understanding of these systems in order to provide cover in the absence of the Site, or Project Manager;
- When operating in absence of the Site, or Project Manager then refer to the responsibilities of the Site and Project Manager as detailed below.

### Operatives and Plant Operatives

- Have knowledge of the Company IMS Standards, Policies, Procedures and the associated documentation especially their specific duties within them;
- Undertake daily plant, or equipment inspection in accordance with the [SMS012 Plant, Equipment and Machinery Procedure](#);

### Site Supervisor – Water Technologies

- Carry out health and safety responsibilities as outlined in the JFH Regeneration Health, Safety and Environment policy and communicate the policy to Site Employees;
- Be familiar with John F Hunt Regeneration Standards, Policies and Procedures within the IMS and contribute to the continual improvement of the IMS;
- Compliance with current management systems certificated to ISO9001, ISO14001 and ISO45001;
- Familiarity with the MCERTS framework and ensuring that sampling and testing is conducted according to procedure;
- Ensure that directly reporting staff are provided with appropriate support, guidance and resources to enable them to discharge their Health and Safety duties;
- Ensure that directly reporting staff are provided with appropriate support, guidance and resources to enable them to fulfil their Environmental responsibilities – e.g., preventing pollution from emissions to land, air and water, assessing aspects and impacts, producing Site Environmental Management Plans, etc;
- Be aware and competent to fulfil the responsibilities detailed below for that of Site or Project Manager as these roles are closely linked.

### Operator Mechanical and Operator Electrical – Water Technologies

- Have knowledge of the Company IMS Standards, Policies, Procedures and the associated documentation especially their specific duties within them;
- Undertake any specific Site duties as detailed in Company Procedures.

### Project or Site Manager

- Have knowledge of relevant Health and Safety, Environmental and Asbestos legislation and Company IMS Standards, Policies, Procedures and are competent in communicating this to Site Operatives;
- All work on their sites is adequately planned, sufficiently organised, resourced and effectively managed, monitored and reviewed to enable the works to comply with all relevant current Health, Safety and Environmental legislation, British Standards, Company Policies, Procedures and Standards as identified in the Company Legal Compliance Registers - Health and Safety [45001 Legal Compliance Register](#) and Environment [14001 Legal Compliance Register](#);
- Compliance with current management systems certificated to ISO9001, ISO14001 and ISO45001;
- Ensure that directly reporting staff are provided with appropriate support, guidance and resources to enable them to discharge their Health and Safety duties;
- Ensure that directly reporting staff are provided with appropriate support, guidance and resources to enable them to fulfil their Environmental responsibilities – e.g., preventing pollution from emissions to land, air and water, assessing aspects and impacts, producing Site Environmental Management Plans, etc.

## Safe Systems of Work

- All foreseeable significant hazards on site such as but not limited to what has been identified i.e., falls from height, traffic management, plant movements, storage of hazardous and flammable materials, asbestos removal and lifting operations are always fully controlled by safe systems of work which are documented and communicated to all Site Employees;
- The preparation of all the safe systems of work documentation covering Risk Assessments, Method Statements, Task Sheets and Site-Specific Environmental Risk Assessments. Consult with other Managers and Appointed Supervisors/Workers. Ensure they are written by the most competent;
- That all works are undertaken with suitably and sufficiently prepared Method Statements, Risk Assessments, or Task Sheets and that these are clearly communicated with workers in accordance with the [SMS002 RAMS Procedure](#). If not directly prepared by the PM, then they should ensure the competence of the delegated person;
- All Subcontractor Risk Assessments, Method Statements and associated documentation have been reviewed with approval recorded on the [Subcontractor RAMS Check](#) prior to the works commencing on site;
- Ensure that all Permits to Work are in place for any work requiring them in accordance to the [SMS016 Permit to Work Procedure](#);
- Ensure that any lifting work on site is conducted according to the [SMS014 Lifting operations Procedure](#). That the Project Lifting Plan is complete, and the [Lifting Equipment and Accessories Inspection Register \(LOLER\)](#) is being maintained by a competent trained person;
- All temporary works are managed by the appointed temporary works representatives in accordance with [SMS019 Temporary Works Management Procedure](#)

## Accidents & Incidents

- Ensure familiarity and compliance with the [SMS003 Accidents and Incidents Reporting and Investigation Procedure](#);
- Notify the CEO and ADHSEQ of any accident or incident on site, whether reportable or not, that becomes a dangerous occurrence;
- Ensure that all accidents and incidents are recorded in the Site Accident Book and securely stored in line with GDPR and then complete a [Site Accident and Incident Report](#) and assist the ADHSEQ/HSM with any further investigation as required;



- Complete and submit the [Monthly HSE Incident Summary](#) to the ADHSEQ;

## Communication

- Ensure that a copy of this Policy is available on site and communicate this to Site Employees making sure that they are aware of their responsibilities within it;
- Prepare and submit all required Site notification and ensure that all required notices are displayed as per [SMS001 Health and Safety Management Procedure](#):
  - F10 Notification;
  - Health and Safety Law poster;
  - Company Insurances;
  - Fire Risk Assessment, Site Fire Plan, Fire and Emergency Procedures Notice, Site Fire Safety Management Register;
  - HSE Policy Statements;
  - Applicable licenses;
  - First Aiders & Fire Marshals.
- Prior to works commencing the contents of safe systems of work have been communicated to all Site Workers, for example via Task Briefings, Daily Activity Briefings, RAMS, Toolbox Talks
- Encourage the use of [STAR Point of Work Risk Assessments](#) and Hazard Spotting Cards amongst the workforce and communicate actions using the '[You Said, We Did](#)' Report;
- Circulate to all Site Workforce all safety information received from the Health and Safety Team;
- That local community management liaison procedures have been implemented with the site's adjacent neighbours and local community to ensure they are aware of site activities which may have an impact on them;
- Any groups of Site Operatives who have limited or no English language skills only work within non-risk areas on site under the control of a competent English-speaking representative in a ratio of 6:1;
- These workers should be recorded on the [SMS001/14 Migrant Worker Register](#) to ensure provision has been made for any language difficulties;
- Ensure adequate worker engagement through communication and regular attendance at meetings such as [Site Safety Committees](#) and that these meetings are recorded;
- All site workers are inducted on first arrival using the [Site-Specific Induction Presentation](#) and the induction recorded on the [Site HSE Induction Form](#) and [Site Induction Register](#);
- All site visitors are inducted on first arrival using the [Site Induction for Visitors](#) and the induction recorded on the [Site Visitors Safety Induction Form](#) and Site Induction Register.

## Asbestos

- Where notifiable asbestos works are being undertaken, they shall ensure that the requirements of the Asbestos Plan of Work and Risk Assessments are achievable and have the highest priority over all other works on site. They shall ensure all requirements as detailed within the Asbestos Plan of Work have been communicated to them by the Asbestos Supervisor prior to any asbestos removal works commencing;

## Fire & Emergency

- Ensure familiarity and compliance with the [SMS005 Fire & Emergency Procedure](#) and communicate to Site workforce;
- Ensure that a [Site Fire Risk Assessment](#) has been produced by a competent person prior to works commencing on Site and this is displayed prominently. If there are significant office buildings on site a [Premises Fire Risk Assessment](#) should also be prepared;

- Display prominently a Site Fire Plan using the Site Fire Risk Assessment showing locations of fire points, escape routes, checkpoints, escape lighting etc along with [Site Fire & Emergency Procedures Notice](#) and if applicable [Premises Fire & Emergency Procedures Notice](#);
- Complete and maintain the [Site Fire Safety Management Register](#) in accordance with the [Regulatory Reform \(Fire Safety\) Order](#) 2005 and conduct, or delegate to a competent individual the regular fire safety checks within it. This should be displayed on Site;
- Be familiar with their duties as outlined in the [EMS009 Environmental Emergency Preparedness and Response Plan](#) and ensure that Emergency Site Procedures are in place and communicated to the workforce to counter any potential environmental incident;
- React immediately to any environmental incident on Site and deploy competent trained people to implement the necessary emergency measures immediately. The incident is then reported as soon as possible to the ADHSEQ and where required to the Local Authority or Environment Agency;
- All site storage of hazardous, dangerous, combustible provisions are stored and maintained according to Company Policy and Procedure so as not to cause an adverse Health, Safety or Environmental impact;
- Ensure all site Employees, Contractors and Visitors are signed in on a daily basis in the [Site Employees and Visitors Register](#). This register will be the basis of any emergency evacuation 'roll call'.

## Personal Protective Equipment

- Ensure familiarity and compliance with the [SMS009 PPE Procedure](#);
- Ensure that all the Workforce, Visitors and Clients are provided with all necessary PPE and RPE sufficient to ensure their occupational Health and Safety throughout the works, or visits, they are undertaking and that it is worn;
- Ensure that those having to wear respiratory protection are always clean shaven and hold a face fit test for that mask;
- Ensure all PPE issues are recorded on the [PPE Issue Register](#).

## Plant, Equipment and Tools

- Ensure familiarity and compliance with the [SMS012 Plant Equipment and Machinery Procedure](#) and the Company Health and Safety Standard No 9 for Managing Plant, Equipment and Tools on site;
- All plant, equipment and tools are maintained, inspected as per Procedure, in a fully serviced and safe condition, are "fit for its purpose" and by its operation does not cause an adverse impact on the environment. A copy of a current insurance test certificate and Thorough Inspection Report shall accompany all plant and lifting equipment and accessories on site;
- Ensure that the [Daily Plant Inspections](#) are being conducted by operators and weekly [Provision and Use of Work Equipment Register \(PUWER\)](#) by a competent trained person.

## Temporary Works

- Ensure familiarity and compliance with the [SMS019 Temporary Works Management Procedure](#);
- All required site designs have been arranged with the relevant competent third party and the site installation works managed by the appropriate temporary works representatives and documentation including temporary works;

## Site Security

- Ensure familiarity and compliance with the [SMS017 traffic and Pedestrian Management Procedure](#);



- There are adequate security arrangements in place to prevent unauthorised access and for the management of the site entrance;
- There is no unauthorised access to any work areas of their site at any time and all visitors are always issued with the relevant PPE and accompanied by a Competent Person.

## Occupational Health

- Ensure familiarity and compliance with the [SMS018 Occupational Health Procedure](#);
- Where they suspect any Employee or Subcontractor is under the influence of alcohol and/or drugs, they immediately implement action in accordance with the [Company Occupational Health, Drug and Alcohol Management Policy](#). They then notify the Health, Safety and Environmental Team and CEO/Managing Director to discuss further actions;
- Liaising with the Health, Safety and Environmental Team to carry out a full investigation of any right to refuse to work on the grounds of safety by a Company or Subcontracted Employee which has been notified to them;
- Ensure there are always suitable and adequate provision of welfare facilities on site throughout a project and they are provided and maintained in a condition in accordance with current legislation and Company Standards.

## Audits & Inspections

- All noncompliance issues raised in internal and external audits reports are closed out within the identified timescales;
- Respond immediately to all concerns identified in Site Inspection Reports provided by the Health, Safety and Environmental Team. Ensure that reports are closed out and returned within the identified timescale;
- That receipt of any Local Authority Officer, (e.g. Environmental Health Officer), or Environment Agency Officer issued enforcement notice is immediately acted upon and advised to the Company Health, Safety and Environment Team as soon as possible;
- Undertake and record regular inspections of their site as per current Procedures using the designated report form.

## Commercial Managers, Bid Managers, Procurement Managers, Quantity Surveyors and Estimators

In addition to Company Employee/designated Subcontractor responsibilities they are required to ensure that:

- They have knowledge of the Company IMS Standards, Policies, Procedures and the associated documentation and ensure that they are following these processes;
- All tenders give sufficient allowance to all aspects of Health, Safety and Environmental Management in accordance with current Legislation and Company Health and Safety, Environment, Asbestos Management, Anti-Bribery and Corruption Policies;
- All estimates, tenders and orders are carried out in compliance with the Company's IMS;
- Compliance with current management systems certificated to ISO9001, ISO14001 and ISO45001;
- As part of the tendering process the Client has provided the required Pre-Tender documentation and information in accordance with Appendix 2 Construction (Design and Management) Regulations;
- All External Providers invited to undertake work for this Company have been approved in accordance with the [QMS009 Evaluation of External Providers Procedure](#);

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- Ensure that the Company supply chain conforms to Company Policies and Procedures and have been evaluated and approved using either the [QMS009/01 External Provider Evaluation Questionnaire](#) or the [QMS009/02 Online Product Supplier Appraisal Checklist](#);
- Encourage the procurement of supplies from sustainable sources wherever possible;
- All Company Site and Project Managers have been supplied with adequate, (non-financial), information for each Subcontractor and the work to be undertaken on site;
- Have a good working knowledge of all current Safety Legislation in particular the Company Health and Safety, Environment, Asbestos Management, Anti-Bribery and Corruption Policies.

### Compliance and Training Manager

In addition to Company Employee/designated Subcontractor responsibilities they are required to ensure that:

- The IMS is maintained to an appropriate level commensurate with the business activities of the Company;
- Compliance maintained to ISO9001, ISO14001 and ISO45001; ISO50001 and other accreditations as directed by the board.
- Manage the internal audit programme and conduct internal audits.
- Co-ordinate and attend external audits as the Company representative for the management system;
- Provide information and feedback on the IMS and its effectiveness to the CEO and Senior Management;
- Undertake Company inductions when required;
- To continually look at improvements that can be made to the IMS and to respond to advice and guidance from Competent Persons towards improving the IMS;
- Ensure that all Safety Critical, Lead, Asbestos and other medicals are scheduled and conducted for all employees' requiring them;
- Maintain the training database to ensure Employees are adequately trained for their roles;
- Schedule random drugs and alcohol tests across the company sites and offices.

### Sentinel Coordinator

- Sentinel Administration, including issuing of Sentinel Contracts of Sponsorship, administration of Sentinel Database, issue of Sentinel Cards, Sub-Sponsor Agreements, De-sponsorship etc.
- New Starter Sentinel Checks for 'Previous Transgression'
- Providing induction briefing including the Sentinel Scheme Rules
- Coordinating alcohol and drugs screening - pre-appointment / pre-sponsorship, annual unannounced random, periodic, for cause, post-incident, and maintenance of annual drugs and alcohol for cause contract.
- Coordinating rail medical screening and renewals.
- Administration of rail training and assessment.
- Administration of Annual Trackworkers Continued Suitability Check.
- Circulation of Network Rail Safety Bulletins, PTS Handbooks, Rule Book updates etc.
- Administration of Track Visitor Permits (TVP).
- Administration of Personal Protective Equipment for rail workers.
- Administer Planned Preventive Maintenance (PPM) Schedule for owned equipment and safety critical equipment.

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- Coordination of advice, guidance or instruction on any restrictions based on medication and other medical fitness issues.
- Ensuring that the management of working hour's process complies with rail infrastructure rules.
- Maintaining annual CIRAS subscription.
- Enacting the Local Investigation process where any suspected breach of the Sentinel Scheme Rules becomes apparent.
- Hosting the RISQS audit.

### Office Personnel

The Office Personnel health and safety responsibilities are to ensure that they:

- Understand the Company Health, Safety and Environment Policy, their responsibilities and comply with its requirements;
- They have knowledge of the Company IMS Standards, Policies, Procedures and the associated documentation and ensure that they are following these processes;
- Avoid improvisation and only use the correct equipment for the task;
- Use the correct personal protective equipment as provided;
- Report all defective equipment and materials and any obvious safety or health hazards;
- Take reasonable care not to endanger themselves or other persons through their actions or omissions at work;
- Refrain from horseplay and follow all Health and Safety rules;
- Do not misuse or abuse anything provided under a statutory requirement in the interests of Health and Safety;
- Co-operate with the Company on all aspects of Health, Safety and Welfare;
- Do not operate any equipment unless they have been fully trained and instructed in its operation;
- Report all accidents and incidents so that action can be taken to prevent a recurrence;
- Inform their Line Manager of any change to their state of health, either temporary or permanent, which might affect their working ability or their suitability to carry out any particular task.

### Company Employees

These are all other Employees/designated Subcontractors not identified by positions above. All Company Employees in addition to the above whether Directors, Managerial, Supervisory or Manual Trades are required to ensure they are fully aware of the contents of this Health and Safety Policy and fully understand its requirements along with their roles and responsibilities.

All Company Employees/designated Subcontractors are required to ensure:

- They have knowledge of the Company IMS Standards, Policies, Procedures and the associated documentation and ensure that they are following these processes;
- They take reasonable care for the health and safety of themselves and of other persons who may be affected by their acts or omissions at work. It is an important condition of employment that all employees work safely to avoid injury and ill health to themselves and others;

- They fully co-operate with the Employer to ensure all the environmental requirements placed upon them are complied with and the contents and requirements of this Policy are always achieved;
- That by their acts or omissions they do not cause an environmental offence;
- They fully cooperate with the Employer so far as is necessary to ensure that all Health and Safety requirements placed upon the Employer are achievable and complied with;
- It is the responsibility of any Employee witnessing an accident to assist the injured person(s). If safe to do so they should assess the injuries/situation. Then as best as they can:
  - Control any immediate risk of further injuries or occurrences;
  - Ascertain the level of emergency response and call an ambulance, or first aiders, if required;
  - Provide appropriate medical treatment;
  - Secure the accident/incident area to preserve the scene pending investigation;
  - Inform/call the SM/PM to attend the scene.
- No Employee/designated Subcontractor shall intentionally or recklessly interfere with or misuse anything provided by the Employer in the interest of Health, Safety and Welfare. It is the Company's Policy that it will act against any Employee who persists in abusing or not using such provisions in the correct manner;
- They are fully trained and experienced in the works they are required to undertake and, in the plant, equipment and tools they will operate;
- They immediately report to their supervisor any hazards, unsafe conditions or actions noticed by them or brought to their attention using the Hazard Spotter Card system returned to the Site, Project, or other designated Manager immediately;
- They promote the continuous improvement of Health and Safety performance amongst their work colleagues and others;
- They respond immediately to any Health and Safety and Environmental requirements;
- They ensure they are aware of and comply with the contents of this policy;
- They use and maintain in a good and safe condition all Personal Protective Equipment and Respiratory Personal Equipment provided;
- They use plant, equipment and tools that are in a safe condition and they report all defects immediately;
- They ensure all plant and equipment they operate does not cause any adverse effect on the environment;
- Act or dress in such a manner as not to cause offence to any person within the local community and the public in general;
- Have a commitment via training to the management of the environment;
- They avoid any improvisation;
- They refrain from any horseplay;
- They are aware of all disciplinary procedures and Company site rules;
- For Site Employees/designated Subcontractors that they hold or are working towards achieving the relevant category of CSCS or CCDO card;
- Employees/designated Subcontractors undertaking work on site shall only undertake those works when:
  - Risk Assessments and a Method Statement have been written;
  - The contents of those Risk Assessments and Method Statement have been fully explained to them and they have signed the Safety Talk Register to confirm they have received the talk and understand what is required;

- They hold the appropriate training to carry out the work and operate plant, equipment and tools needed;
- They are competent to carry out that work;
- They are physically capable of carrying out the work.

All Company Employees/designated Subcontractors shall have the right to refuse to work on the grounds of Health and Safety if in their opinion it is unsafe to do so or is liable to contribute to or cause an accident. This refusal will not affect any condition of employment and will not subject them to any Company reprimand or disciplinary procedure or affect any term of employment.

All refusals will be recorded and fully investigated by the Company which will ensure that person is kept fully informed on the progress and outcome of the investigation.

All Employees/designated Subcontractors shall be aware of all the requirements within the Company Occupational Health, Drug and Alcohol Policy and they will be liable to random drug and alcohol testing.

## Safety Points to Remember

- 1) Think before you act - Under current Health and Safety Legislation (HSW Act Reg. 7) and this Policy every Employee of this Company is liable for what they do and don't do not only to themselves but to others who may be affected.
- 2) No one shall intentionally or recklessly interfere with or misuse anything provided in the interest of Health, Safety or Welfare ([Health & Safety at Work etc. Act Regulation 8](#)).
- 3) Ignorance of all statutory legislation is NOT an acceptable plea in a court of law.
- 4) Prosecution under the Health and Safety at Work etc. Act 1974 and all subsequent Regulations may lead to a conviction and a fine and/or imprisonment along with a criminal record.
- 5) If you are not sure of anything – ASK – do not improvise.
- 6) This Company sets the goal to achieve standards above the legal requirements.

## Employing Young Persons

### Under 18

Due to the nature of the Company business and its inherent dangers under normal circumstances Young Persons, (defined as someone above school leaving age but under the age of 18), will not be employed unless agreed to by the Company insurers and confirmed in writing.

Exemptions to this will be by the Young Person undertaking work experience projects or employed on a temporary basis on a specific project either within head office or site office only. At no time will they be placed in any area of risk. Prior to any Young Person commencing such work the following criteria shall be implemented:

- Consultation with that young person to determine what needs to be achieved and those requirements put into a plan of work with specific Risk Assessments developed which have been advised to the person's parents;
- A Management Representative will be appointed to oversee the progress of that plan and the responsibility and supervision of that person;
- A Risk Assessment shall be carried out to determine all control measures considering the young person's inexperience, lack of perception of danger, immaturity and physical capabilities and any medical concerns which need to be identified;
- Assessment of their workplace, workstation and work equipment to be used;
- The working plan is to be reviewed on a regular basis by the employer

## Between 18 and 21

The Policy of the Company is to employ young persons over 18 but only for specific projects and duties which will be confirmed by specific Risk Assessments and required control measures with a developed training plan which includes a Company induction by a Director. These persons will always be employed on manual duties only and be under the continuous supervision of nominated Competent Person(s) within non-risk areas.

All young persons will be encouraged to progress their experience and training. Where that experience includes plant operations, they will be allowed to operate plant only in a safe environment and under the continuous supervision of a Manager or designated Competent Plant Operator.

## Over 21

All persons over 21 will be employed by the Company to undertake the normal work-related activities relevant to their category of employment for which the requirements of this Policy will be relevant to them.

## Disabled Persons

The Company is always keen to promote the benefits and abilities of those who are disabled by such restrictions as limited mobility. However, due to the nature of the Company business and its inherent dangers and risk, it is the policy of the Company to ensure those persons benefits and abilities are promoted within the Company Site Offices or Head Office only.

## Foreign Nationals

It is always the intention of the Company to bring benefit to those foreign nationals who wish to work within the industry. It is therefore the policy of this Company is to employ such persons with the normal proviso due to the inherent dangers of the industry that they are competent with the English language and be able to understand the requirements of work instructions, site safety requirements, site emergency procedures and site safety signage.

All Foreign National will be employed in accordance with current Home Office requirements managed by our HR Department.

A separate [Employment Policy](#) details these arrangements.

The use of foreign nationals from labour agencies shall also be subject to specific rules before being used on sites and this is detailed within the Employment Policy.

## Temporary Employees

Where the Company has a need to supplement its management and Site Employees', temporary workers will be employed from agencies for various contracted periods. These persons will be treated as Company Employees and included within all Company Procedures, Policies and training requirements. They will be issued with all required PPE at no cost.

## New Company Employees

Prior to commencing work Employees will undergo a Company induction by a Competent Person who will also make them aware of the Company Policies, Procedures and Handbook. Site Employee inductions will be provided by the Site Management. Reinduction will be carried out when deemed necessary particularly after changes to policies and procedures, emergency arrangements, changes to workplace layouts and any other key information that could affect the Safety and Health of the Employee.

## Network Rail/London Underground Rail Safety Management

When the Company undertakes work on the Network Rail or London Underground Infrastructure, the Project Manager for that project shall ensure the requirements as detailed in the [SMS024 Working on Network Rail Projects](#) Procedure are implemented. This will be monitored for compliance during the regular HSE inspections by the Health & Safety Team and Internal Audits by the IMSM.

## Designers

Design work shall be subcontracted to persons or organisations that have the competency to undertake the work in accordance with the [Construction \(Design and Management\) Regulations 2015](#) (CDM2015) and will be part of all temporary works requirements as per [BS5975:2019 Code of practice for Temporary Works](#) procedures and the permissible stress design of falsework.

Other design elements such as the development of construction phase plans and methodologies shall be undertaken by competent management within the Company.

## Health, Safety and Environmental Resources

The Company are using the following competent Health, Safety and Environmental resources to provide the relevant advice and assistance, carrying out site safety inspections and undertaking internal inspections. Currently this is being undertaken by:

- Keith Kelsey – Associate Director Health, Safety, Environment and Quality;
- Steve Blundell – Associate Director Health, Safety, Environment and Quality;
- Daniel Sweeney – Environmental Manager (JFH Group) BA, MSc, Grad IEMA;
- THSP Ltd - Health, Safety, Environmental and Employment law consultants;
- Vincent Brown – Vincent Brown Law
- Kate Kizalas – Remediation Manager WAMITAB CoTC Inspections.
- Dr Sam Hall – Managing Director WAMITAB CoTC Inspections.



## Part 3 - Arrangements and Procedures

### Managing Risks from Work Activities

To ensure the Company achieves the requirements of their Health and Safety Policy the following risk based safety management procedures will be implemented on all sites including whilst working on third party infrastructures as per the requirements of the Health and Safety at Work etc. Act 1974 and the [Management of Health and Safety at Work Regulations 1999 \(MHSWR\)](#).

### The Construction (Design and Management) Regulations 2015 (CDM2015)

The Company acts as Principal Contractor and Contractor on site in accordance with CDM 2015. When acting as Principal Contractor on Notifiable projects the Company will produce the Construction Phase Plan developed from the Clients supplied pre-tender information ([CDM Guidance L153 Appendix 2](#)). The Plan will be the "Site Safety Management Manual" which covers all site issues supported by the individual site work package risk assessments, method statements and task sheets. The document will be treated as the "live" Health and Safety management manual for the site. As conditions change or new techniques and processes are employed on site this plan will be updated.

Where we are working in the role of a Subcontractor our responsibilities will be strictly adhered to in accordance with regulations 15 and part 4 of CDM 2015.

Company Procedure [SMS001 Health and Safety Management](#) provides details of the procedures to be followed for compliance.

### Risk Management

It is the Company's intention to assess risk in a proportionate manner and applying sensible measures to control the risk in our workplaces. The control of risk associated with the identified hazards from the company's activities is detailed in the Company Procedure [SMS002 Risk Assessments and Method Statements](#).

The purpose of this Procedure is to carry out 'suitable and sufficient' Risk Assessments of all activities undertaken by the Company, to identify the potential hazards and the level of risk encountered. The Company will then implement sensible and effective control measures to prevent personal injury and damage to property. This Procedure applies to all Company Employees and others not directly involved in our activities and includes both routine and non-routine activities.

The Company will ensure all works are sufficiently planned and resourced to minimise the adverse impacts of pollution and will implement a programme of monitoring throughout any contract to monitor the impacts.

### Method Statements

These documents will be produced after the Site Risk Assessments have been developed detailing how the proposed specific individual work packages contained within a project will be safely executed following the appropriate measures to control the risks. Where required, to either clarify how each work package will be executed, or a new method added then company work activity Task Sheets will be employed which will supplement the main Method Statement.



Where the Company is acting in the role of Contractor only, the relevant site-specific work package Risk Assessments, Method Statements and Task Sheets will be required. A Construction Phase Plan is not a requirement in the role of Contractor. If working for a Principal Contractor copies of all such documents will be provided to them as a means of reference only.

The Company [SMS002 Risk Assessments and Method Statements](#) Procedure provides details of the procedures to be followed for compliance.

## Task Sheets/Briefings

Task Briefings can be used in conjunction with Method Statements for specific tasks within the Method Statement, or for certain tasks where a full Method Statement is not required. They should be prepared by the competent and designated individual leading that part of the works. They should include:

- An outline of the work to be undertaken;
- Available resources;
- Site specific arrangements for managing Health and Safety risks, such as preventative and protective measures;
- Site specific emergency arrangements.

The information provided during the task briefing should:

- Consider the level of training, knowledge and experience of the audience;
- Relevant and up to date;
- Consider all significant risks – being task and site specific;
- Consider language difficulties, or disabilities;
- Be understood by everyone and be signed off to indicate this;
- Have the information in the relevant sections of the template

## Design Risk Management & Temporary Works

Design work shall be in accordance with the Construction (Design and Management) Regulations 2015 (CDM2015) and will be part of all Temporary Works requirements as per BS5975.

The design and detailing for all temporary works and other required designs to facilitate work being undertaken will be carried out by appointed Structural Engineers. All design work and its management will be undertaken in accordance with the Company [SMS022 Design Procedure](#) and associated designer's documentation.

All Temporary Works requirements shall include schemes to prevent unauthorised access, earthworks, support, strengthen, underpin, and provide stability to all structures to facilitate processes and any other company activity and prevent any uncontrolled collapse in line with the current BS 5975 'Code of practice for Temporary Works Procedures and the permissible stress design of falsework'.

Where any structural concern or instability is identified during the works, then those works will be stopped, and the Company Structural Engineers will be called to site to carry out the required investigations. From their investigations they will provide a report on the potential risks from the identified concern or instability and their recommendations to resolve the issue from further temporary works.

All Temporary Works and their management will be undertaken in accordance with the Company [SMS019 Temporary Works Procedure](#).

Other design elements such as the development of Construction Phase Plans and methodologies shall be undertaken by Competent Management within the Company covering all Company activities.

The Company [SMS022 Design Procedure](#) provides details of the procedures to be followed for compliance.

## Hazardous Work Areas Including Asbestos

We acknowledge that techniques and processes are sometimes dangerous and requires special procedures and methods of work to be considered if it is to be achieved safely without risk to Health and Safety. We aim to establish the necessary considerations to ensure that there are safe places of work with safe access and egress by the implementation of Safe Systems of Work (SSoW). All works shall be carried out in accordance with current standards and guidance with safe systems of work developed. All demolition works shall be carried out in accordance with British Standard [BS6187:2011 Code of Practice for Demolition](#).

Prior to any project starting an asbestos survey will be conducted by a UKAS ISO17020 and ISO17025 accredited organisation. Any asbestos removal works will be undertaken by a competent, accredited, licensed and approved Contractor.

The treatment of soils containing asbestos will be managed, where applicable, by following the [CAR-SOIL Control of Asbestos Regulations 2012](#) Interpretation for Managing and [Working with Asbestos in Soil and Construction and Demolition Materials](#) guidance issued by CL:AIRE. Further details of the Procedures for managing asbestos in soils can be found in the Company [EMS008 Asbestos in Soils Procedures](#).

For dismantling activities, the Company Health and Safety Standard [No 10 Managing Demolition on Site](#) shall be referenced to provide information on the standards required.

## Preventing Falls from Height

The requirements of the [Work at Height Regulations 2005](#) will be implemented with the aim of minimising the risk to persons from falls from height and applies to all work by persons at **any** height where there is a risk of a fall liable to cause a personal injury. With any height relating to above, at, or below ground level. The hierarchy of controls as laid out in the regulations for managing work at height shall be adhered to on all sites and will require that:

- Avoid all work at height where possible;
- Where work at height cannot be avoided a suitable and sufficient Risk Assessment to be carried out;
- Where work at height must be carried out then the most appropriate means of fall prevention shall be implemented selected from the hierarchy of control measures listed;
- Where a risk of falling cannot be eliminated then measures shall be implemented to minimise the distance and the consequence of that fall.

For full details relating to Preventing Falls from Height Procedures reference shall be made to Company [SMS015 Work at Height](#) Procedure and the Company Health and Safety Standard No 1 [Preventing Falls from Height](#). All control measures shall be determined by a Site-Specific Risk Assessment.

## The Control of Noise

During our activities the [Control of Noise at Work Regulations 2005](#) applies to all areas of work where noise is generated and for the protection of persons from exposure to noise and potential hearing damage. We shall ensure that:

- During work noise risks to Company Employees shall be assessed;
- If a risk is identified implement control measures to eliminate or reduce the risk;
- Ensure the legal limits set for noise are not exceeded;
- Provide persons with information, training and instructions on noise risk;
- Provide appropriate hearing protection;
- Implement Occupational Health surveillance where there is a risk to health.

For full details relating to Controlling Noise Risk on Site procedures reference shall be made to the Company Health and Safety Standard No 4 "Managing Noise on Site". The Company Procedure [SMS011 Noise and Vibration](#) details the procedures to be followed to ensure compliance.

## Control of Vibration - Hand Arm Vibration (HAV) and Whole-Body Vibration (WBV)

We recognise that some of the company's activities has the potential to expose our workers to levels of vibration. We shall put all required controls in place to minimise the risk to persons from the operation of hand held powered mechanical and electrical plant which can lead to a range of conditions known collectively as Hand Arm Vibration Syndrome (HAVs) and the use of plant and equipment that can cause Whole Body Vibration (WBV) as per the [Control of Vibration Regulations 2005](#).

For full details relating to managing vibration on site procedures reference shall be made to the Company Health and Safety Standard No 5 "Managing Vibration on Site". The Company [SMS011 Noise and Vibration](#) Procedure details the procedures to be followed to ensure compliance.

## Dealing with UXOs

The potential for finding Unexploded Ordnance (UXOs) through the activities of the Company is a significant aspect.

Prior to any works being conducted in an area which has potential for UXOs surveys will be conducted by an approved, competent, specialist Contractor.

The Company [SMS005 Fire and Emergency](#) Procedure details the procedures to be followed to ensure compliance for the identification and possible discovery of UXO's and UXB's on sites.

## Safe Access and Egress

Safe access and egress relate not only to entry to the whole site but also to individual work areas within that site. The principle is to prevent any unauthorised access to those areas and where access is

authorised personnel can access and egress those areas safely and without risk to their Health and Safety.

Details relating to safe access and egress to work areas are identified within the Company [SMS017 Traffic and Pedestrian Management](#) Procedure.

## Permits to Work

In order to control work that is of a high risk permits to work will be issued to authorised personnel to control the identified risks and setting out the main precautions needed to complete the job safely. These Permits to Work will be issued for the following categories:

- Hot Works (Issued daily);
- Confined Space Entry Working (Issued daily);
- Permit to Excavate (Issued daily);
- Permit to Work at Height (Issued for all work at height).

The Company [SMS016 Permit to Work](#) Procedure provides details of the procedures to be followed for compliance.

## Housekeeping

Good housekeeping shall be maintained on all sites as a tidy site is a sign of a safe site. The following provisions shall be implemented on all Company sites:

- All areas of any site to be kept clean, tidy and hazard free and all work areas shall be free of any accumulation of concrete dust. No accumulation of rubbish within site facilities all such wastes shall be bagged and disposed of daily. General waste bins must have lids and at no time shall accumulation of such rubbish generate a risk from any infestation;
- All site materials, gases, consumable's, tools and equipment shall be stored in the appropriate compound or secure container and stored so as not to cause a hazard to employees or others and prevent slips, trips or fall risks;
- All site accommodations and welfare facilities shall be maintained and serviced daily and any damaged facility shall be replaced immediately;
- There shall be no burning of materials on site at any time;
- All spillages shall be cleaned up immediately to prevent any slips, trips and falls;
- All diesel-refuelling points shall be from double skin bowzers with the ground covered in absorbent material changed on a regular basis;
- Materials such as glass shall be cleared from the work areas on a continuous basis and placed into waste containers;
- Trailing leads, cables and hoses or other obstructions that could cause a tripping hazard on any access route or within work areas are either re-routed, covered over or raised above head height;
- All fire escape routes and exit points are free from obstructions, tripping hazards, stored items, etc.

## Health & Safety Concerns

It is Company Policy to acknowledge the right of Employees to refuse to work on the grounds of Health and Safety if they have any concerns relating to Health and Safety wherever they are working. If an Employee believes that carrying out a task could result in an incident or an accident, it is the Employee's right to refuse to work without discrimination or being subjected to any reprimand or disciplinary procedures with any concern reported to their:

- Site or Project Manager;
- Remediation Manager;
- Demolition Manager;
- Operations Manager;
- Network Rail COSS;
- Immediate Line Manager or Supervisor.

The Manager responsible for the Site, or Works on a Project, or Network Rail COSS, who are advised of the situation are responsible for ensuring that the persons refusing to work, or any other persons involved in the task are withdrawn from the Works until a full investigation is carried out.

The Health, Safety and Environment Team and responsible Director will be advised of their action and carry out the required investigation.

The [SMS024 Working on Network Rail Projects Procedure](#) details the procedures to be followed to ensure compliance.

## Behavioural Safety Management

The Company is developing a positive safety culture through the process of looking out for one another daily, changing perceptions and behaviour of its workforce and creating partnership between management and employees to achieve its goals.

The Company offers the opportunity for everyone to report any hazards or concerns they may have along with any suggested improvements through a near miss/hazard spotter reporting system.

All suggestions are reviewed on a regular basis by management and Company Health and Safety Team, and a monetary voucher awarded to the individual with the best hazard identification or suggestion.

Behavioural safety aspects will also form part of the root cause analysis of any site accident or incident investigation to determine how Site Employees perceive safety requirements on site.

Behavioural Safety Workshops and Training sessions are conducted regularly by the ADHSEQ. Regular communication of HSE is through email and the Company HSE Hub which is available to employees and contractors.

## Safety Champion Programme

The Safety Champion programme promotes a positive safety culture throughout the workforce. Safety Champions are given training by the ADHSEQ and sign a commitment to raise safety awareness, encourage engagement and empower others to influence positive change throughout the

workforce. Safety Champions are rotated every few months to ensure this programme is not limited to a few individuals.

## Accidents, Incidents & First Aid

Under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013, (RIDDOR), there is a requirement for the Company to report and record specific workplace accidents, occupational diseases and dangerous occurrences.

The Company operates a separate policy covering the requirements of the regulations. See [RIDDOR Reporting Policy](#).

The Company [SMS003 Accidents & Incidents Reporting & Investigation](#) Procedure and [SMS004 First Aid](#) Procedure details the procedures to be followed to ensure compliance.

## Consultation with Employees

The Company recognises that one of its best management tools for the business is keeping all Employees informed, listening to concerns and ways of possible improvement. This contributes to its development through the objective of ensuring continual improvement in organisation performance and is achieved through regular communications and consultations with its Employees and Subcontractors.

The Company operates a separate Policy covering the requirements of the regulations. Please see 'Employee Communication and Consultation Policy'.

## Induction Training

All new Employees and Subcontractors/Agency staff given a designated role within the Company shall receive Health and Safety induction training as part of their general induction into the Company. These take place as soon as possible after they commence employment, ideally upon arrival. The objective of the training is to ensure that new members of staff are familiar with all fundamental aspects of health and safety which relate to their employment and the contribution that they can make to a safe working environment. Such inductions will include the following information:

- Health and Safety management system;
- Fire notices;
- First aid notices;
- Location and job-specific requirements;
- Guidance relevant to the individual's work;
- Relevant specific/detailed risk assessments.

All Employees/designated Subcontractors will sign to say they have received the induction and provided with the Company staff handbook.

## Site Safety Induction Talk

As part of the site start up establishment, all Site Employees including all Subcontractors will be required to attend a Site Safety Induction Talk given by the Site, Project or other Designated Manager. The

topics for the induction talk are detailed within the Company Health and Safety Site Induction presentation.

## Training

As required by the Health and Safety at Work Act etc.1974 the company will ensure that adequate and appropriate safety training information and instruction is provided to all Directors, Management, Site Supervisory Staff, Plant Operators, Site Employees and Head Office personnel with the intention of ensuring every Employee becomes competent enough to enable them to eliminate or reduce the risk of injury to themselves, their work colleagues and others who could be affected by the works of their company such as the public.

The Company operates separate Policies covering the requirements of the current regulations, the [Training Policy](#) and the [Working with Local Communities Policy](#).

The Company [QMS008 Training and Development](#) Procedure details the procedures to be followed to ensure compliance.

The Company has set minimum and desirable training requirements for each role. These are subject to continual review by the Operations Directors, ADHSEQ and Training Manager. These can be found in the [Training Requirements](#) table.

Training Needs and Gap Analysis assessment will be undertaken by the Training Manager and Training Assistant with input from the Operations Directors and ADHSEQ.

The Company will not rely solely on training certification as a guide to competence. In addition to regular onsite assessment of competence by Line Managers a yearly appraisal will be undertaken for each Employee/designated Subcontractor with the following aims:

- To assess competency and training;
- Highlight gaps and needs;
- Opportunity for feedback;
- Assess future career direction and any needs associated.

The appraisals will be conducted by the individual's Line Manager using the [QMS008/06 Appraisal Form](#) which is then kept in a confidential file by the Training Manager. Any training needs or experience gaps identified during the appraisal can then be addressed through training or experience provision.

## Measuring and Monitoring Competency

Irrespective of their training and experience, all new Employees/designated Subcontractors will have their competence visually assessed by the Site/Project Manager, or competent designated Manager, prior to being allowed to work unsupervised.

Competency checks will not be restricted to new Employees/designated Subcontractors. Assessments will be made by the Site Management on a day-to-day basis and the Health and Safety Team during regular inspections.

## Plant & Equipment



The Provision and Use of Work Equipment Regulations 1988, (PUWER), and the Lifting Operations and Lifting Equipment Regulations 1998, (LOLER), shall apply to all items of work equipment provided by the Company for use by Employees or the Self-Employed. The Company shall carry out all its activities and operate and maintain all plant and equipment in good and efficient working order in compliance with the manufacturers' recommendations and legislation to minimise noise, dust, gaseous and aqueous emissions into the environment.

Work equipment covers all plant, machinery, equipment, powered and non-powered hand tools and includes ladders, scaffolding, mobile access equipment, self-propelled plant, lifting equipment and accessories.

Managing Plant, Equipment and Tools on Site are in accordance with the [Company Plant, Tools and Equipment Policy](#), [SMS012 Plant Equipment and Machinery](#) Procedure and [SMS014 Lifting Operations](#) Procedure along with the Company Health and Safety Standard No.9 Managing Plant, Equipment and Tools on Site.

## Scaffolding

Scaffolding shall be supplied and installed by a specialised scaffolding contractor and shall be managed in accordance with the Company Health and Safety Standard No.7 Scaffold Requirements on Site which identifies all required control measures.

## Company Cars

The Company will provide Company cars or vans to authorised persons who hold a full driving licence. The drivers of those vehicles shall ensure the following:

- The vehicle is always maintained in a fully roadworthy condition in accordance with the Road Traffic Act;
- Any defect on the vehicle is rectified immediately;
- They drive the vehicle in accordance with Road Traffic legislation and indicated signage and instructions;
- They do not drive the vehicle whilst under the influence of alcohol or any prescribed medication or banned substances which could limit or restrict driving capabilities;
- Pay any Congestion Charge immediately;
- Use and park the vehicle correctly so as not to incur any fines etc;
- Mobile telephones must not be handled whilst driving. They can only be used fully hands-free and set up before driving. If they are deemed as distracting, you may be stopped by the police;
- Take regular rest breaks (every two hours) if driving long journeys;
- Smoking and the smoking of e-cigarettes within Company vehicles and cabs of plant is strictly prohibited.

In the event of the following, it shall be reported immediately to the responsible person at Head Office:

- Any received fine or ticket;
- Involvement in an accident particularly one which involves personal injury;
- Any arrest due to a traffic offence;
- Any court appearance and subsequent judgement;
- Any change to driving licence conditions.



For full details reference can be made to the [JFH Group Company Vehicle Policy](#).

## Mobile Telephones

The Company will provide all management with mobile telephones as an aid to the effective and safe management of sites. This will not apply to the use of mobile telephones whilst driving. It is the policy of the Company to restrict all such use to "hands free" method of using a mobile telephone and has made provisions to have such a facility installed in all users' vehicles. Mobile telephones shall not be allowed in or used whilst any form of plant; equipment or tools are being used in any part of any site. Mobile telephones can only be used on site when the Operative has determined it is safe to do so and is not put at risk from their surroundings or puts others at risk by their actions.

## The Control of Substances Hazardous to Health Regulation COSHH

The Control of Substances Hazardous to Health Regulations 6<sup>th</sup> Edition applies to company activities where employees may encounter possible hazardous substances through their work.

The Company manages this process through the [COSHH Management Policy](#), [SMS006 Hazardous Substances](#) Procedure and the Company Health and Safety Standard No 6 Managing COSHH on Site.

## Dangerous Substances and Explosive Atmospheres Regulations (DSEAR)

The Dangerous Substances and Explosive Atmospheres Regulations (DSEAR), set minimum requirements for the protection of workers from the risks of fire and explosion arising from dangerous substances and potentially explosive atmospheres in the workplace. The Company manages this process through the [SMS023 Dangerous Substances and Explosive Atmospheres Regulations \(DSEAR\) Procedure](#). Further to the requirements of the Management of Health and Safety at Work Regulations to manage risks, Regulation 5 of DSEAR requires that where a dangerous substance is or is liable to be present at the workplace, a suitable and sufficient assessment shall be made of the risks to Employees and other persons that arise from the substance. DSEAR does not address the health risks from substances; these are dealt with by the COSHH Regulations.

An assessment shall be undertaken on the substances on Site regarding the DSEAR requirements using the appropriate form, classifying zones where explosive atmospheres may occur and marking areas where necessary.

For the assessment to be considered suitable and adequate, the detail and expertise with which it will be carried out will reflect the nature and degree of risk arising, as well as the processes complexity and variability.

## Information, Instruction and Supervision

The Company recognises the need for good information, instruction and supervision through effective communication and in order to comply with the Health and Safety at Work etc. Act 1974 (HASAWA) the Company has developed the Employee Communications & Consultancy Policy, [SMS013 Safety Signs and Signals](#) Procedure and [SMS001 Health and Safety Management](#) Procedure.

## Manual Handling Operations

In accordance with the Manual Handling Operations Regulations the Company will endeavour to avoid the need for employees to undertake manual handling operations that involve a risk of injury.

The Company has developed [SMS008 Manual Handling](#) Procedure detailing the management of all manual handling operations to reduce the risk so far is reasonably practicable.

## Fire and Emergencies

In order to manage the legal requirements relating to this section the Company has developed the [SMS003 Accidents and Incidents](#) Procedure, [SMS005 Fire and Emergency](#) Procedure and the Company Health and Safety Standard No 3 Site Emergency Procedures. All Site fire, first aid and site evacuation control measures shall be determined by a site-specific risk assessment.

## Personal Protective Equipment (PPE)

The Company will ensure that suitable and sufficient PPE is provided to all Employees, where the risks cannot be controlled by other means, who may be exposed to a risk to their Occupational Health, Safety and Welfare whilst at work, and that all employees will receive the appropriate training in its use, care and maintenance. PPE will be supplied at no cost to the Employee. All PPE shall be regarded as the last means of controlling risks and not the first.

In order to manage this the company has developed the Personal Protective Equipment Policy, [SMS009 Personal Protective Equipment](#) Procedure and the Company Health and Safety Standard No 8 Managing PPE & RPE on Site.

## Employee Welfare, Safety and Health

The Company shall ensure facilities are provided at each work site in accordance with schedule 2 of the Construction (Design and Management) Regulations 2015. Arrangements shall also follow the current [HSE Operational Guidance for Welfare Standards for Construction Work](#) that has updated requirements related to the CIS59 document. [HSE CIS59 Provision of Welfare Facilities during Construction.](#)

The Company shall ensure so far as is reasonably practicable the following suitable and sufficient facilities have been provided at readily accessible places on site. In addition, the Workplace (Health, Safety and Welfare) Regulations 1992 shall apply to all other Company premises not related to construction activities. The duties placed upon us under these regulations shall be controlled to ensure that the general condition of our premises along with the condition of equipment in place is of a suitable condition and design that will not affect the health, safety and welfare of employees and others.

For full details relating to Managing Welfare Facilities on Site procedures reference shall be made to the Company Health and Safety Standard No 2 Site Welfare Facilities.

## Working Times

Working times will be in accordance with the Working Time Regulations and its contained requirements. Any Employee wishing to work beyond the stated 48 working hours per week up to a maximum of 65 hours per week shall have signed the required Opt-Out Agreement obtained from the Company HR Department.

All Site Employees working hours shall be managed and recorded by the site Project Manager daily.

The conditions of the Working Time Regulations shall include driving times as part of these hours.

## No Smoking Policy

In accordance with current legislation, Company No Smoking Policy and the Employee Handbook. There shall be no smoking allowed within any Company enclosed, or substantially enclosed premises.

## Occupational Health, Drugs and Alcohol

### Monitoring Occupational Health

The Company aims to ensure that any work-related ill health of its Employees is suitably managed. Due to the nature of the work undertaken by its Employees the Company has developed the Occupational Health & Drug & Alcohol Management Policy and the associated SMS018 Occupational Health Procedure.

In line with the COSHH Regulations employees exposed to hazardous substances such as respirable dusts, fine mists and vapours will undergo face fit testing to ensure that filtered face pieces are suitable and prevent any inward leakage of any hazardous substance.

### Safety Critical Activities

Personnel carrying out safety critical activities such as Crane and Excavator operators etc. will be assessed as to their medical fitness for that work prior to carrying out the activity for the first time and be re-assessed at the appropriate age-related intervals.

### Drug and Alcohol Management

It is the policy of the Company to prevent alcohol and banned substance abuse amongst our direct and indirect employees.

As part of the Company Occupational Health & Drugs and Alcohol Policy all Employees and Subcontractors will be subject to random drug and alcohol surveillance and for cause testing which will be notified to all personnel and subcontractors as part of their site safety induction. The testing will be undertaken by a specialist retained company.

### Management of Subcontractors

The Company uses Subcontractors to undertake some work activities. This is managed through the Approved Subcontractors Management Policy and further supplemented by the [QMS009 Approved External Providers](#) Procedure, [QMS010 Management of External Providers](#) Procedure and the SMS001 Health and Safety Management Procedure.

### Monitoring, Audit and Review

The Company has implemented an ISO 9001 Quality Management system, ISO 45001 Health & Safety Management system and ISO 14001 Environmental Management System. This will form the basis of our monitoring, audit and review process. Currently the Company undertakes regular Site Health, Safety and Environmental inspections that incorporates a review of paperwork along with Internal Audits. In addition, inspections and monitoring are carried out on a daily basis by site personnel. This is detailed

in the SMS001 Health and Safety Management Procedure, [QMS001 Management System Review Procedure](#) and [QMS002 Management System Audits Procedure](#).

## Continual Improvement

Management Reviews determines whether changes to Company Safety Management System Procedures are required and also for making recommendations to Company Directors on any identified concerns and requirements. A log of continual improvements will be held on SharePoint.

## Record Keeping

The Company [QMS004 Control of IMS Records](#) Procedure identifies the process for the management of all IMS records.

## Part 4 – Environmental Management

### Environmental Policy Statement

John F Hunt Regeneration are a multi-disciplined team working to ensure the provision of a range of regeneration solutions, including but not limited to: Soil and Groundwater Remediation, Water Technologies, Dismantling and Enabling Works.

**This environmental policy establishes our commitments to:**

- ✓ Reducing Carbon emissions with the goal of halving by 2030 and zero by 2050 (Baseline 2021/22);
- ✓ Environment protection and to the prevention of pollution;
- ✓ Minimising the environmental impact for the life cycle of our installations,
- ✓ At least comply with our compliance obligations including to legal requirements and the requirements of interested parties;
- ✓ Continually improve our environmental performance and environmental management systems.

Our significant environmental negative impacts include demolition activities including the production of environment noise, vibration, dust, and demolition wastes.

**We have an established an environmental management system, which is in-line with ISO14001:2015 and ISO50001, to deliver the above commitments, with the objective to:**

1. Identify and understand our environmental risks and opportunities and environmental aspects and impacts.
2. Identify and understand our compliance obligations, including legal requirements and the needs and expectations of interested parties.
3. Identify potential emergency situations, and ensure that the risk is minimized, and that we are prepared to respond to them.
4. Ensuring all workers understand their environmental responsibilities and are competent in their tasks.
5. Using and maintaining work equipment and premises to meet our environmental objectives.
6. In purchasing consider a life-cycle approach in materials selection and construction techniques and select the best technological, environmental, and economical practical option.
7. In planning ensure we achieve all our commitments and ensure the efficient use of resources through superior design, specification, procurement, material handling, use of competent operatives and through effective waste reduction, reuse, recycling, and recovery of wastes.
8. Reviewing the performance and effectiveness of the Environment Management System.
9. Delivery of continual improvement through improvement plans and control of non-conformity.
10. Measure and reduce our Scope 1, 2 and 3 Carbon emissions against our Carbon emissions baseline.

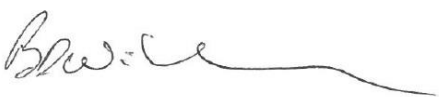
We have established environmental objectives to achieve the commitments which are regularly monitored by the management team.

We communicate our environmental policy to all interested parties. This policy is displayed on company premises, presented at new employee induction, displayed in any fixed construction sites under our control, and made available upon request from interested parties.

We review the effectiveness and adequacy of this environmental policy on an annual basis and as part of change planning, lessons learnt, knowledge transfer or following an environmental incident or other failure to meet our environmental objectives.

As the individual with ultimate responsibility for environment at John F Hunt Regeneration I approve this environmental policy,

Signed



**Ben Williams, Chief Executive Officer**  
August 2024

## Site Environmental Management Plan (SEMP)

The Company [EMS001 Environmental Management](#) Procedure provides guidance on the Environmental Aspects and Impacts of the Company.

On Company Project Sites an Environmental Management Plan (SEMP) will be developed detailing the relevant Environmental Aspects and Impacts along with their control measures, monitoring requirements, emergency procedures and controlling legislation for the works being undertaken. The SEMP will be developed to minimize the environmental and social burdens associated with our activities through the implementation of a life cycle approach.

The SEMP may include:

- Impacts Management/EIA;
- Waste Management;
- Asbestos Management;
- Sustainability;
- Import/ Export Register;
- Emergency Preparedness & Response Plan.

The SEMP is a live document and is to be reviewed as the Project progresses.

The Plan would also form part of or be compatible with the Mobile Plant Permit (MPP) Deployment Form and Monitoring Plan, should this be needed for a Project.

## Legal Compliance Register

The Company has developed the [EMS012 Regeneration 14001 Legal Compliance Register](#) containing relevant Environmental Legislation for the Company activities, the control measures used to meet them and the means by which the Company will evaluate compliance to them.

## Environmental Aspects and Impacts

The Company undertakes an impact assessment of its activities that could have significant adverse environmental effects on key receptors and to determine appropriate controls to mitigate the effects as identified in the [EMS011 Environmental Aspect and Impacts Register](#).

This identifies the adverse impacts and associated risks from the Company activities along with any impacts and the controls required to effectively mitigate the risks. The Company Health, Safety and Environmental Team will also assess the implemented impact control measures as part of their regular site safety and environment inspections.

Each Site should develop a Site-Specific Environmental Aspects and Impacts Register using the [EMS011/01 Site Environmental Aspects and Impacts Register](#) template which has been developed for this purpose.

## Ground Remediation

In order to manage the legal requirements relating to the remediation of ground – soil and water - contamination the Company has developed the [EMS002 Remediation Procedure](#).

## Air Quality Management

Air quality management will adhere to the requirements of current health, safety and environmental legislation, be relevant to planning permissions and other aspects such as EMP's and MPP deployment forms.

Air quality relating to site nuisance dusts, airborne particulate matters, Volatile Organic Compounds (VOC's) and odours will be monitored on an agreed basis for the duration of a project by the Site Management Team and where required by installed monitoring equipment. These will be monitored within and at the site boundary using such methods as photoionization detectors, tube detectors along with visual and olfactory monitoring processes. Results of this monitoring is recorded and held on file.

Where required, baseline air quality monitoring will be undertaken prior to works commencing on site.

The identified impacts and the subsequent control measures are identified within EMS011 Environmental Aspects and Impacts Register with more site-specific control elements included in the Site-Specific Environmental Aspects and Impacts Register and EMP.

All asbestos removal works will be undertaken in accordance with the requirements of the Control of Asbestos Regulations 2012 overseen by an asbestos fibre in air monitoring strategy developed by an appointed UKAS accredited environmental laboratory. The environmental laboratory will be used to establish any asbestos fibres in air release during any asbestos removal works by undertaking asbestos containment background readings, using installed asbestos fibre in air measuring pumps.

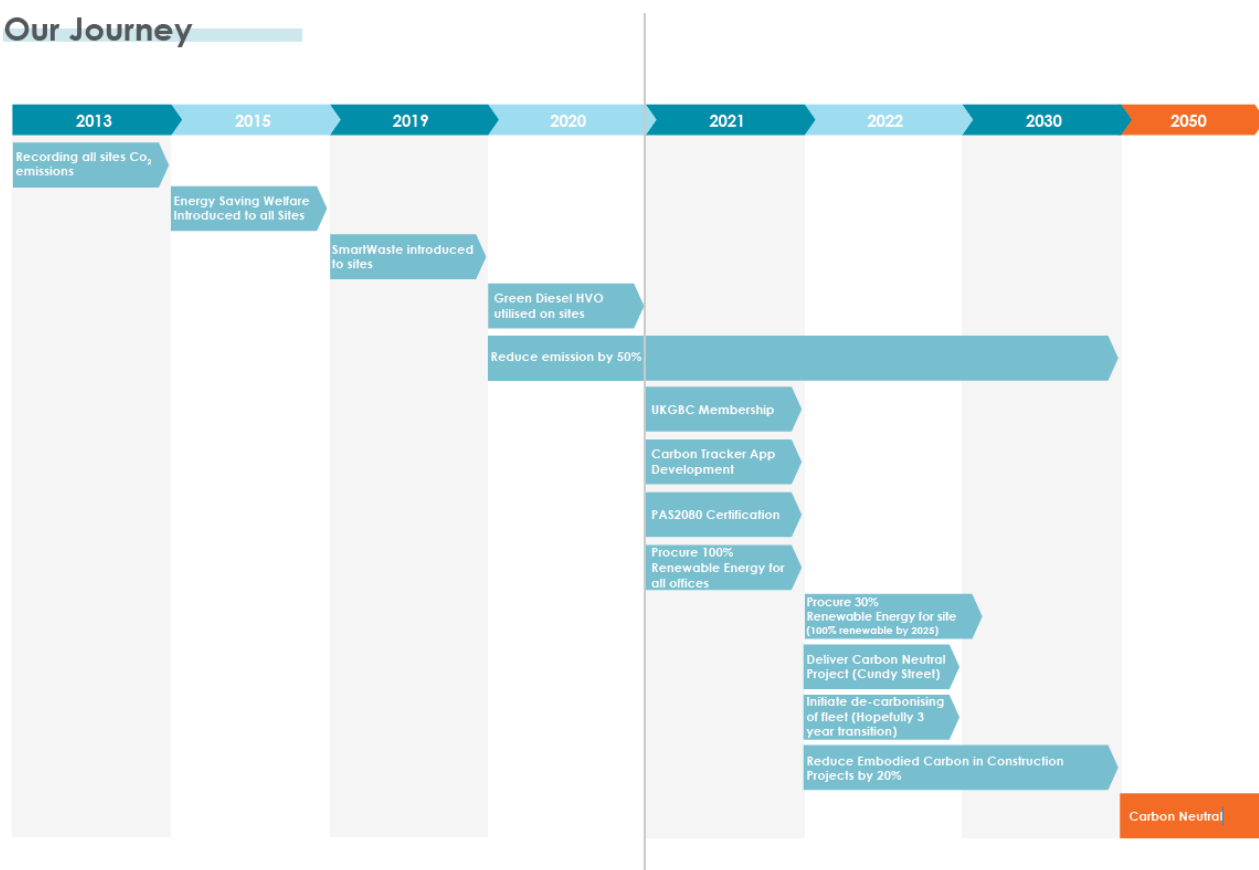
## Journey to Zero - Reducing CO<sub>2</sub>

The Company recognises the pressing need to significantly reduce carbon emissions in the construction and infrastructure industry as a part of the global effort to halt the increase in atmospheric CO<sub>2</sub> and subsequent temperature rises.

The Company has committed itself to halving our carbon emissions by 2030 and achieving carbon neutral status by 2050. These are ambitious targets within our industry and reflect the seriousness of the Company's approach to a sustainable future for the industry and the planet.

We aim to achieve this both by reducing our emissions as far as possible and by undertaking mitigation measures to offset any remaining emissions. We are committed to achieving PAS2080 Carbon Management in Infrastructure accreditation, which was achieved in June 2022 and have furthered our commitment by meeting the ISO50001 Energy Management international standard in December 2023.

## Our Journey



## Carbon Baseline Report

The Company has completed its baseline measurement, (1<sup>st</sup> May 2021 – 31<sup>st</sup> Apr 2022) of Carbon emissions (tonnes of Carbon Dioxide Equivalent (tCO<sub>2</sub>e) for **Scope 1** (direct emissions e.g., emissions from vehicles, generators), **Scope 2** (indirect emissions e.g., electricity supplies) and **Scope 3** (further indirect emissions arising within the supply chain and waste disposal etc). Full details are in the [JFH Regeneration Carbon Baseline Report](#).

Calculations of our Carbon output are made using the UK government department Business, Energy and Industrial Standard (BEIS) conversion factors and the Inventory of Carbon and Energy (ICE) database (V3.0 Nov 2019-1).

<https://www.gov.uk/government/publications/greenhouse-gas-reporting-conversion-factors-2021>

<https://circularecology.com/embodied-carbon-footprint-database.html>

We will aim to achieve our goals through:

- Reduction and efficiencies – for example:
  - Examining telemetry for plant and looking at ways to improve efficiency and reduce fuel use;
  - Looking for alternative non-carbon energy sources – such as Hydrotreated Vegetable Oil (HVO), Hydrogen, Electric (renewable);
  - Monitoring and scoring our supply chain Carbon emissions and working with them, or sourcing supplies from partners committed to reducing Carbon;



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- Reducing travel through increased technology allowing virtual meetings etc;
- Replacing hydrocarbon fuelled cars with Electric Vehicles (EV's) and Plug-In Electric Vehicles (PHEV's);
- Offsetting as a last resort for the Carbon it is not possible, or very difficult to eliminate. This will be through accredited certified schemes only.
- Reducing embodied Carbon in materials used – for example low Carbon/sustainable concrete.
- Monitoring our Carbon emissions on a yearly basis against our baseline.

### Energy & Carbon Management

Full details of how the Company will comply with ISO50001:2018 Energy Management are provided in the [JFH Group Energy Management System Policy](#) and [Carbon Management policy](#).

Emissions data is managed through the [Normative Portal](#) which provides accountability through Scopes 1 – 3 enabling us to monitor our journey to Net Zero.

### NO<sub>2</sub> Emissions and Particulate Matter (PM)

The Company share the current concerns over Nitrogen Dioxide (NO<sub>2</sub>), and Particulate Matter (PM10 & PM2.5) emissions and recognise the established harmful health effects where road transport and site plant with heavy diesel engines contribute to these emissions.

As part of the management of these significant impacts the Company will implement measures such as the following to mitigate emissions:

- Comply with local authority Air Quality Action Plans and NRMM where applicable;
- Reviewing the purchasing of Company cars and fleet vehicles to favour low carbon emission rated vehicles and implementing a car sharing scheme;
- Use of video conferencing and the Microsoft Team application;
- Maintaining plant and equipment to prevent smoke from exhausts;
- The use of ultra-low sulphur diesel;
- All Company vehicles and plant shall be fitted with the appropriate category of catalytic converter to the exhaust system;
- Pre-planned movements of vehicles to and from site;
- Planning of material movements reducing multi load deliveries;
- The planning of waste disposal points as near as possible to the site;
- Crushing materials on site for reuse;
- Restrict idling engines;
- Seeking alternative means of transporting materials and wastes i.e. by river or rail;
- Encouraging people to use public transport to and from workplaces;
- Managing site and head office energy usage;
- The setting of objectives and targets to achieve the best results for compliance with the above requirements.

Designated traffic routes to and from site and to final locations will be determined by:

- The avoidance of using residential roads particularly those with sensitive areas such as schools, hospitals, community centres etc.;
- Avoiding any school starting and finishing times;

- The routing to the major 'A' roads as quickly as possible;
- Avoiding routes through any residential areas.

## Non-Road Mobile Machinery (NRMM)

Non-Road Mobile Machinery, (NRMM), is a broad category which includes mobile machines, and transportable industrial equipment or vehicles which are fitted with an internal combustion engine and not intended for transporting goods or passengers on roads.

NRMM, particularly from the construction sector, is a significant contributor to London's air pollution. The [NRMM Low Emission Zone](#) uses the Mayor and London Borough's planning powers to control emissions from NRMM used on construction sites.

In a similar way to Ultra Low Emission Zone, the NRMM Low Emission Zone requires that all engines with a power rating between 37 kW and 560 kW meet an emission standard based on the engine emission "stage".

To comply with the requirements of the Non-Road Mobile Machinery, (Emission of Gaseous and Particulate Pollutants), (Amendment), Regulations 2014 Policy for low emission zones in local authority areas, sites shall be registered that fall within the category of:

- any development site or within Greater London or within the Central Activity Zone or Canary Wharf following the stated criteria of residential developments of 10 dwellings or more;
- or, where the number is not given, 0.5 ha or more and for all other uses 1000 m<sup>2</sup> or 1 ha of floor space on the NRMM register for NRMM of net power between 37kW and 560kW.

The company shall aim to achieve Stage IIIB of [EU Directive 97/68/EC](#) for Major Development Site within Greater London and Stage IV of EU Directive 97/68/EC for any site within the Central Activity Zone or Canary Wharf.

Stage IIIB and IV have not been defined for machines with constant speed engines, such as generators, will need to meet Stage V of EU Directive 97/68/EC.

Stage IV has also not been directly defined for variable speed engines smaller than 56kW. In most cases these engines will need to meet Stage IV if they are in the Central Activities Zone and Opportunity Areas (OA's).

## Noise and Vibration

Where there is a potential for noise and vibration emissions from sites a site noise and vibration monitoring scheme will be developed for the duration of the project. The requirements for continuous monitoring will be assessed per project and undertaken using static equipment located at designated points around the site. In addition noise will be monitored using handheld noise monitoring equipment where required. Generated noise and vibration from company activities will be monitored on a daily basis for the duration of projects by the site management team. Baseline monitoring will be undertaken prior to works commencing on site.

If required vibration monitoring will also be implemented on selected adjacent properties to establish any potential risk particularly prior to, during and after work.

Where required prior to the project commencing a Structural Condition Survey will be undertaken by appointed engineers on all adjacent buildings particularly those which have been identified as listed to determine any potential adverse effect of any generated vibration on the structures. On completion of the project a Post Structural Condition Survey will be undertaken on the same properties to identify any structural defects, which may have occurred.

The EMP shall identify site specific controls to be adopted to mitigate the risk of the environmental noise and vibration emissions to sensitive receptors.

## Spillage Control

To eliminate the risk of any potential ground, water course or drainage contamination from the various liquids which are used on site and from generated effluents the control measures in the following section will be implemented on sites and managed on a daily basis by the Site Management Team.

## Emergency Preparedness and Response

The Company is committed to ensure that there is suitable preparedness and response processes in place relating the specific environmental emergencies on sites. Details of how the identified emergencies are assessed and the associated risks controlled including the planned response procedures are within the Company [EMS009 Environmental Emergency Preparedness & Response Plan](#).

To ensure that any further potential ground contamination is adequately controlled:

- All diesel storage and refuelling areas will be on a hard stand which will have a spill kit, their own fire points and a drip tray to contain any spills;
- All diesel fuel will be stored in double skin bowsters which in turn will be refuelled at appointed times by bulk delivery tankers thus reducing the need for traffic movements;
- All bowsters shall indicate what it is storing and its capacity in litres;
- An area on site will be designated the plant service and maintenance area with a spill kit available;
- Any liquid escape or spillage such as an oil leak will be cleaned up immediately by designated site personnel.

## Visual Intrusions

To ensure the impact of visual intrusion on adjacent areas is controlled the following control measures will be implemented on sites.

The Company will ensure that the lighting of all sites is kept at the minimum luminosity necessary for adequate security and safety. In addition the lighting shall be located and directed such that it does not cause undue intrusion to adjacent properties and passing traffic.

When the sites are closed all unnecessary site lighting will be turned off and only adequate security lighting will be maintained.

All sites will be made secure by the erection of security hoarding around the whole perimeter of the site. The hoarding will then be painted in a colour scheme agreed with the client. All site hoardings will

be supplied from a sustainable source which will be confirmed by the FSC validation certification. Where possible all hoarding will be recycled by reuse on other sites.

All site boundary hoardings will be maintained in a clean and environmentally friendly condition particularly relating to the removal of fly posters and graffiti which will be checked on a daily basis.

All road areas adjacent to all sites particularly at the site entrances will be maintained as required carried out by mechanical and manual means on a daily basis.

If required particularly during wet days all waste lorries leaving sites will egress the site via an installed wheel cleaning system installed at that egress point or another means of wheel washing.

All waste vehicles will always be maintained by their operatives in a clean and roadworthy condition.

## Rodent Infestation and Pest Control

To minimise the adverse impacts from pests and rodents the following control measures will be implemented on sites in the following order:

- All site drainage systems and access points will be kept secure to prevent rodent access;
- All generated rubbish particularly food waste will be cleared as it is generated and placed into secure bins or containers and removed off site for disposal on a continuous basis;
- A high level of good housekeeping will be maintained on a daily basis on all sites and in all facilities;
- Site rules will be implemented to prevent the feeding of such pests as pigeons and seagulls;
- All food stuffs brought to site will be required to be within storage containers;
- Where all other control measures have been actioned then as a final measure pest control management will be implemented on sites.

## Archaeological Investigation

Where required assistance will be provided to any archaeologists attending site for investigation.

## Community Relations

The Company Site/Project Manager, or their appointed representative, will undertake the role of Local Community Relations Manager who will liaise with the sites neighbouring properties, adjacent residents and local community.

The Site/Project Manager will also maintain a close liaison with the Local Authority, Environmental Health Officer and any Community Relations Team, Traders or Residents Associations. Any or all of whom may be invited to a site prestart meeting with the Company Site Management Team and/or representatives of the Client, where such topics as the following may be discussed:

- The purpose of the project and its timescales;
- Description of the method of work to be employed;
- Proposed techniques to be used and in particular information on quiet working techniques;
- Traffic management including plant movements and routes to be taken to and from the site avoiding sensitive areas such as schools, community centres etc.;
- Management of any hazardous materials on site;
- Identifying the site impacts and means for controlling them;

## Health, Safety & Environment Policy

- Site Safety management proposals;
- The dangers that will be found on site and why no unauthorised access is allowed, particularly for children;
- Details of a telephone 'liaison line' and the name of the contact on site who will process any concerns or complaints;
- Liaison with the Local Authority and other interested parties such as the Police, Fire Brigade and Enforcement agencies;
- Liaison with any local newspapers etc.

Representatives from local traders and residents' associations can be invited to attend regular meetings to be held on site to allow the site management personnel explain the progress of the project and to offer those attending the opportunity to have any complaints or queries answered. At these meetings it is proposed that representatives from the Client and representatives of the Site Management Team would attend to allow them to be introduced to the meeting.

The regular circulation of a computer printed monthly newsletter to the local community and those affected by the works giving news on:

- All major items of work occurring or due to occur on site which may have an adverse impact on the surrounding areas;
- Details of the ongoing project programme;
- Site working times and details of any potential 'noisy' working times;
- Advanced notice of major plant movements accessing and egressing the site.

Dealing with enquiries from external agencies such as enforcement agencies the emergency services and local newspapers etc.

Dealing with all matters relating to:

- Traffic Management routes and movement times in liaison with the police local authority representatives, and local residents;
- Any issues raised by the enforcement agencies;
- Requested site visits by interested parties;
- Liaison with residents and local community in relation to any raised concerns;
- Circulation of newsletters;
- Liaison with the local authority for the provision of all necessary site licenses;
- The maintenance of a site information display board, which will be erected at the site main entrance. The board will display such information as the F10 Notification of Project form, names and details of the site management teams and 24-hour contact procedures;
- Where appropriate inviting persons from adjacent properties or local community representatives to site to see the works in progress and at the same time deal with any concerns they may wish to raise;
- Visiting local schools to highlight the details of the project, the dangers on site, and why they should never access any such area.

This Company is committed to ensure that all work on site will be carried out with the minimum of inconvenience to our site neighbours, local community and the public in general and to ensure they are all involved in all aspects of the project that may affect them.

This will be particularly relevant to ensuring there will be no deliveries or collections to the site and the starting of site plant before 8am and after 6pm. Where any exception is liable to occur such as the movement of heavy plant this will be in accordance with pre-planned times.

## Community Liaison

To help ensure that all persons affected by the Company's projects are kept informed, the following means may be used:

- Local community meetings;
- Visiting adjacent commercial and residential properties;
- Face to face contact with the management team by site visits or visits to individual persons who have limited mobility;
- Circulation of newsletters, (where identified also translated into the various ethnic languages);
- Arranged Site visits;
- Viewing panels in the hoardings;
- Involving a local school to get the children to produce drawings on how they perceive the site then have selected drawings framed and mounted on the site boundary hoardings;
- Information boards mounted at the site entrances which will provide site specific details of the project;
- Providing a commitment to train people from the local community particularly those from disadvantage backgrounds and ethnic minorities;
- Returning something back to the community by such provisions of local sponsorship.

## Residents' Satisfaction

All Residents' satisfaction will not only be achieved by the process detailed above but via the regular local community meetings where such issues can be raised, discussed and resolved.

The procedures for dealing with a complaint are detailed within the Company [EMS001 Environmental Management Procedure](#).

## Environmental Complaints

Where an environmental issue occurs on site or is raised as a concern by adjacent properties or passing people the following actions will be implemented by the Project Management Team.

The issue will be recorded in the site register and investigated by the Site/Project Manager. Where required the appropriate actions will be implemented and the issue closed out. The actions will then be monitored to ensure that they remain effective.

Where it is necessary to undertake work adjacent to occupied properties the company will implement the following control measures:

- As a standard, structures under demolition will be encased in debris netting and monarflex plastic sheeting;
- Scaffold debris fans will be constructed out from the structure at the appropriate heights;
- Where required adjacent to the site covered pedestrian walkways will be constructed;
- The work including plant operations will be within a determined exclusion zone away from other risks;
- Noisy working will be limited to daily pre-agreed times;
- There will be no over sailing of third-party property by cranes etc.;
- Any erected scaffolding which extends over and onto pavement areas will have end caps fitted to all scaffolding and where required the standards wrapped in protective padding;
- All site hoardings will be appropriately lit;

- All work on site will be carried out so as not to inconvenience pedestrians particularly those who have disabilities and road users.

## Dealing with Complaints

As part of the company quality assurance procedures a third-party query or complaints register will be available within the Site/Project Manager's office for the recording of any issues. Once the issue has been recorded site management will investigate the matter and put into place any corrective measures. All such remedies will also be recorded within the complaints register. Further details of these arrangements can be found in the Company [QMS005 Management of Nonconformance Communication & Complaints Procedure](#).

Where there is a potential for any third-party property damage or anything that has the potential to having an adverse effect on property etc. a pre-condition survey with photographs will be undertaken by specialist surveyors on all such property within the vicinity of the site prior to the commencement of the work.

## Local Community Employment

This Company has always been keen to play a role in devoting time, resources and finance to liaising with and employing people who live within our work sites locality particularly within urban regeneration schemes we have successfully been involved in.

## Responsible Procurement

Responsible Procurement has been defined as the purchase of goods, works and services in an environmentally and socially responsible way that delivers value for money and benefits the contracting authority.

All such procurement requirements will be managed by designated persons within the Commercial Team. All subcontract works will be procured from our Approved External Providers List. Where possible External Providers will be procured locally to the site.

In setting up a waste management contract the following parameters will be implemented:

- The waste haulier will use their own fleet of vehicles and not sublet to private owners;
- The waste haulier will provide a copy of their operating license;
- All waste lorries will meet the requirements of current Road Transport legislation and Local Authority Notices;
- Where possible, the same waste lorry drivers are assigned to the contract to allow them to meet the requirements of this policy and site requirements;
- The waste transportation routes from the site to the disposal points will be determined the compliance of these routes will be audited.

## Wildlife Protection (Flora and Fauna)

As most species of animals are protected under the [Wildlife and Countryside Act 1981](#) prior to any works commencing on site a full ecology survey will be undertaken of the area scheduled for regeneration and particularly any adjacent derelict areas but also any surrounding areas such as grasslands, woodlands, rivers and canals. During the works if any protected species of animal or its



habitation are discovered this will be reported to the client and Natural England for their advice and recommendations.

As part of the survey, any identified species which are on an endangered list will be recorded and a management plan devised in liaison with the Client and any Specialist Advisors they may wish to appoint for the protection and management of such species.

Prior to any work commencing any trees that are identified as having protection orders on them will be protected by installing a protective barrier around the trees.

## Compliance

Environmental compliance will be reviewed as part of the site safety visits carried out by the Health, Safety and Environment Team and any concerns identified will be recorded within an inspection report to ensure compliance with the requirements stated within this policy. A copy of the report will be issued to the site Project Manager for his immediate response.

In addition, environmental compliance inspections will be undertaken by WAMITAB qualified personnel, should an MPP be deployed for that particular contract.

## Communication

To ensure all sites are fully aware of all current environmental requirements and implications the following will be implemented:

- The issue of Health, Safety and Environmental notices, copies of bulletins, news cuttings and information displayed in common areas;
- Ensuring all Subcontractors sign up to the requirements of this Environmental Management Policy and are committed to the objectives of the project safety and environmental management through co-operation and co-ordination;
- The Health, Safety and Environment Team will hold informal discussions with site management and employees including sub-contractors about current environmental issues or concerns during site visits.

## Training

All Company personnel will receive training in the contents and requirements of this Policy, Methods of Waste Management, and current environmental issues. This training will be in the form of circulation of information, in house presentations, site management environmental talks, and attendance at seminars.

As part of their initial induction all new employees into the Company will receive training on the Company Policy.

Regular site environmental toolbox talks will be provided to Site Employees by the Site Management using selected talk topics relating to environmental management.

At the commencement of any project the Site/Project Manager will provide a Site Safety and Environmental Induction to all Site Management, Site Employees and Subcontractors on all site requirements relating to safety and environmental procedures and requirements.

On their first visit to site all visitors will also be given a visitor specific safety and environmental procedures induction. All persons receiving the relevant site safety and environmental training will be recorded as such.

To ensure the Company remains fully updated on its environmental obligations and issues of new legislation, the Company will use the following as required:

- Environmental Manuals subscription;
- Environmental Bulletins;
- Environment Agency Net Regs alerts;
- Safety and Environmental magazines subscriptions;
- CL:AIRE;
- CECA.

## Inspection, Audit and Reporting

This will be undertaken as per the section 'Monitoring, Audit and Review' in Part 3 of this Policy.

Environmental compliance will be audited as part of the site safety inspections carried out by the Company Health and Safety Team who will record any identified environmental concerns on the issued safety report. Separate environmental inspections will be undertaken in addition to the Health, Safety and Environmental inspections as per permitting and waste legislative requirements.

## Corporate Social Responsibility

The Company recognises and appreciates its responsibility for Corporate Social Responsibility as detailed within this Health, Safety and Environmental Management Policy and within the separate Company [Corporate Social Responsibility and Sustainability Policy](#).

## Sustainability

In undertaking the activities associated with this Company it will aim to maximise the requirements of sustainable development within new sites construction and provide a source of reclaimable or recyclable materials to the construction industry. This will be achieved by meeting the basis of sustainability which is "The concept of meeting the needs of the present without comprising the ability of future generations to meet their needs".

The Company will contribute to this by returning to the new construction of any site and the construction industry the highest amount of materials from what was originally used on those sites. The Waste Hierarchy below details this further.

In addition to the recycling of generated materials additional recycling will be undertaken of the following materials generated from the management of each project:

- Recycling of site hoarding materials;
- Recycling of all packaging and containers;
- Returning computer cartridges;
- Returning of all pallets to original provider;
- Collecting all recyclable materials into their respective containers for recycling.

For more detailed information on the individual waste management streams processing reference should be made to company [Recycling and Reclaim Waste Management Policy](#).

In addition, the Company promotes the implementation of Sustainable Remediation in general accordance with the Sustainable Remediation Forum [SuRF UK](#).

## Media

The activities undertaken by the Company always have significant safety and environmental responsibilities which can draw the attention of interested parties, activists' groups and/or the media from both the press and television. To ensure the integrity of this company and the Clients we are working for or have worked for is maintained at all times. It is the Policy of this Company that Employees and our Subcontractors who are approached for comment from any such organisations must refer the matter to the CEO who will formulate the most appropriate response.

## Waste Management

The management and disposal of waste shall comply with [The Waste \(England and Wales\) Regulations 2011](#) and the [Waste Hierarchy](#) guidance. The Company ISO14001 [Legal Compliance Register](#) identifies how we comply with environmental legislation. Further details of waste management can be found in the [Company Recycling and Reclaim Policy](#) and [EMS010 Waste Disposal Procedure](#).

Waste management strategies will be developed with the Client for each individual Project and may include Site Waste Management Plans, [SmartWaste](#) and implementation of the [BREEAM](#) scheme to allow the Company to:

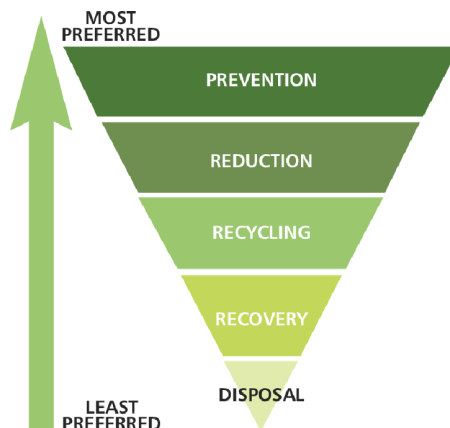
- Improve its environmental performance;
- Meet legislation requirements;
- Reduce waste disposal and its costs;
- Maximise resources available.

## The Waste Hierarchy

The Waste Hierarchy ranks waste management according to what is best for the environment. The Company will follow the UK government [Guidance on Applying the Waste Hierarchy](#), 2011 and [Guidance on Applying the Waste Hierarchy to Hazardous Waste](#), 2011.

Top priority goes to Prevention, followed by Reuse, Recycling, Recovery and finally disposal in either landfill, or incineration.

The Waste Hierarchy as described in the [EU Waste Framework Directive 14](#):



By Definition<sup>1</sup>:

- Prevention – Using less material in design and manufacture. Keeping products for longer. Using less hazardous materials;
- Reuse – Checking, cleaning, repairing, refurbishing, whole items or spare parts;
- Recycling – Turning waste into a new substance or product. Includes composting if it meets protocols;
- Recovery – Includes anaerobic digestion, incineration with energy recovery, gasification and pyrolysis which produce energy (fuels, heat and power) and materials from waste: some backfilling;
- Disposal – Landfill and incineration without energy recovery.

Therefore, the aim of the Company shall be to:

- Reduce generated levels of waste;
- Promote sustainability;
- Reclaim the maximum amount of materials for reuse;
- Recycle the maximum amount of materials;
- Setting Waste Management KPIs.

In managing all generated wastes from our Projects the Company has a legal requirement under Section 34 of the [Environmental Protection Act 1990](#) to ensure that it achieves best practice in managing all generated waste whether for recycling, reclaim or disposal using the appropriate documentation.

Although the requirement for Site Waste Management Plans were repealed on the 1<sup>st</sup> December 2013 the company will continue to use SWMP's as appropriate. All waste information will be recorded using tools such as SmartWaste, which will assist in providing information for the End of Project Report and any BREEAM requirements the Client may have and an aid for acting as a checklist so as to minimise the landfill destination of generated wastes and maximise their reclaim or recycle value.

<sup>1</sup> Defra – *Guidance on Applying the Waste Hierarchy*, June 2011

## Waste Disposal

### Hazardous Wastes

Prior to the handling of any potentially hazardous materials identified on Site such as redundant chemicals etc. the Company shall identify what the chemicals are along with handling procedures and disposal arrangements. Information regarding any hazardous wastes should be identified within the pre-construction information provided by the Client. Where the potential hazards of chemicals etc. cannot be determined then Environmental Consultants and/or Specialist Waste Disposal Companies will all be consulted and where required will produce a method statement with risk assessments for the removal and disposal of such hazardous materials.

Any hazardous wastes shall be disposed of in the correct manner by specialist waste management contractors using the correct Hazardous Waste consignment documentation. All waste transport companies shall be registered with the Environment Agency and issued with certification confirming what waste they can collect and transport. A copy of that certificate must be issued to this Company before they commence the removal of any such waste.

All Hazardous substances shall have COSHH risk assessments carried out on them prior to any works commencing. These assessments shall determine any hazards they may contain, how to control them, the monitoring implications required, the record keeping necessary and the protection requirements of personnel and waste disposal requirements.

All suppliers and manufacturers of materials will be required to provide Safety Data information on any substance that contains a risk to persons and the environment. This information shall include the correct methods of usage, controls measures, and PPE required, monitoring implications and methods of preventing uncontrolled release of such substances and disposal. These Safety Data information sheets will then be turned into COSHH Risk Assessments.

All hazardous and/or flammable liquids, chemicals, gases or solids shall be stored in correct and adequate facilities so as to be able to control any emergency situation leading to the potential emission of any hazardous material, gases or vapour.

The Company will establish site-specific emergency procedures to be able to control any environmental situation.

All identified hazardous wastes will be removed and placed into separate secure and sealed waste bins which will be located within their own area on sites then transported to the appropriate disposal facility. Soils containing hazardous substances will be segregated and clearly marked. Hazardous wastes from site will normally consist of:

- Contaminated soils (e.g. EWC 17-05-03\* Soil and Stones Containing Hazardous Substances);
- Asbestos containing materials;
- Fluorescent light tubes;
- Waste hydraulic oils etc.;
- Some electrical and electronic equipment (WEEE).

All hazardous wastes shall be pre-treated before leaving site by containment methods to prevent any possible release of the substance.

Any clinical waste or drug related debris found on sites shall be collected in accordance Company Procedures and placed into approved containers for transportation to an incinerator point.

## Controlled and Non-Hazardous Wastes Management

All generated controlled and non-hazardous wastes will be sorted for reclaim or recycling or disposal and placed into their respective storage containers. Once full, waste vehicles from registered waste hauliers will transport the wastes to the contracted reclaim or recycling centre, or finally to a nominated landfill site. Some of these wastes will be placed into open waste bins which will be located within their own area on site and removed from site once filled.

## Waste Transportation

On all Company sites, all waste and materials for reclaim and recycling will be transported by a Company approved waste carrier who will be licensed to transport such wastes.

Hazardous and non-hazardous soils and aggregates will generally be transported from Site using covered 8-wheel tippers by approved licensed waste hauliers.

If appropriate, waste skips or containers will be:

- Hazardous waste – fully enclosed, secure and lockable skip or container.
- Non-hazardous, inert waste – in open skips which will either be sheeted over before leaving site or, once on the lorry, the auto-skip cover will be used. Containers shall be fully enclosed and sealed so to prevent spillage.

All the generated waste streams, where practicable, will be placed into individual waste skips, bins or suitable containers for that category of waste and taken to the appropriate recycling or waste transfer station for processing into recycling streams any remaining waste such as asbestos etc. will go to specialist landfill.

To reduce the impact of waste transportation and lorry movements all waste removal will be coordinated with the appropriate waste hauliers so as to establish where the waste will be taken the shortest route possible to be taken and the minimum amount of collections possible.

In setting up a waste management contract the following parameters will be implemented:

- The waste haulier will use their own fleet of vehicles and not sublet to private owners;
- The waste haulier will provide a copy of their operating license to the Company;
- All waste lorries will meet the requirements of current Road Transport legislation and Local Authority Notices;
- Where possible, the same waste lorry drivers are assigned to the contract to allow them to meet the requirements of this policy and site requirements;
- The waste transportation routes from the site to the disposal points will be determined the compliance of these routes will be audited.

## Waste Documentation

All hazardous wastes will be disposed of in accordance with the [Hazardous Waste Regulations Duty of Care Consignment Note 'procedures'](#) and removed by a licensed hazardous waste removal company for disposal at the appropriate licensed hazardous disposal site.

All non-hazardous wastes will be disposed off-site by a licensed waste carrier at a designated licensed disposal facility. Company waste transfer notes will be issued for each load called "Authenticated Receipts".

All waste documentation shall comply with the waste regulations and have the Company Standard Industrial Classification, (S.I.C), code on it along with a signed waste hierarchy declaration.

On project sites the management of all such documentation will be undertaken by Site/Project Manager.

In the event of an environmental audit all waste transfer notes must be able to provide evidence of the route the waste has taken and where it has been disposed of and by whom.

## Records

The following records will be maintained using a combination of registers, SmartWaste and BREEAM by an appointed site management representative:

- The category and weight of each Hazardous waste load removed from site and its disposal destination;
- The category and weight of each non Hazardous waste load removed from site and its destination whether it is for reclaim or recycling or landfill disposal;
- The number of waste lorries which have visited site and distance travelled;
- The details of the company who removed the wastes from site;
- The details of the destination of all those wastes (be it a recycling plant or landfill).
- The amount of delivered diesel fuel and which has been used by the following:
  - Site Excavators;
  - Site Generators;
  - Waste lorries.
- The categories and amounts of site consumables delivered to site such as oils, welfare and PPE.

From this information the Company will produce records detailing material tonnages being removed against energy usage. All such documentation except for asbestos materials shall be maintained for two years.

## Crushing

In some cases, there may be the requirement for crushing concrete where this can be salvaged from a project for on-site reuse in the sites reconstruction. The crushing of such material on sites will play a significant role in the reduction of waste lorry movements to and from the site. This will eliminate the need for materials for crushing being removed from sites by vehicles, taken to an external site for crushing, then returning the crushed materials back to original point.



The crushing plant to process material generated will be operated in compliance with the relevant permitting regime. The crushing process will be assisted by the reduction of the generated materials by the use of mechanical pulverisers to prepare the hardcore for the crusher and remove re-bar. Once the materials have been suitably downsized they would be placed in the crusher which would be fitted with dust and noise suppression kits.

Company procedure [EMS006 Procedures for the use of Mobile Crushers](#) identified the process to follow to comply with the requirements the [Pollution Prevention Control Act 1999](#) and the [Environmental Permitting \(England and Wales\) \(Amendment\) Regulations 2016](#).

## Asbestos Management

All asbestos containing materials will be removed and disposed of in accordance with the requirements of the [Control of Asbestos Regulations 2012](#) and its supporting Codes of Practice and HSE ALG memos.

The treatment of soils containing asbestos will be managed, as applicable, by following the CAR-SOIL Control of Asbestos Regulations 2012 Interpretation for Managing and Working with Asbestos in Soil and Construction and Remediation Materials guidance issued by CL:AIRE. Further details are contained in the Company [EMS008 Asbestos in Soils Procedure](#).

## Notifiable Asbestos

Any notifiable asbestos containing materials as identified within the appropriate Survey will be removed by Asbestos Licensed Contractors under fully controlled conditions within constructed containments, in accordance with the Control of Asbestos Regulations 2012, the subsequent ACOP and the Asbestos Licence Contractors Guide.

## Non-Notifiable Asbestos

All non-notifiable asbestos containing materials unless under the Notifiable Non-Licensed Work requirements will be removed in accordance with control measures and conditions appropriate to the material being removed. Removal of all non-notifiable materials shall meet fibre levels below the detailed Control limits and the Sporadic and Low Intensity criteria as detailed within the Control of Asbestos Regulations 2012.

## Asbestos Waste Disposal

All notifiable and non-notifiable asbestos waste will be disposed of in accordance with the Hazardous Waste Regulations to approved licensed tips. Transportation will be in sealed skips carried out by licensed specialist waste disposal contractors only.

All appropriate documentation will be completed, and records kept by the Company for the designated period.

## Non-Hazardous Asbestos in Soils Disposal

Soils containing asbestos deemed non-hazardous, no visible asbestos and fibres <0.1% wt/wt, (Technical Guidance WM3), can with prearrangement be disposed of at a licensed waste site using tipper lorries by licensed waste hauliers.

## Energy and Waste Minimisation

The Company has a commitment towards energy and waste minimisation at all its office locations. This will aid the reduction of carbon emissions and will be achieved by the following.

### Minimisation of Packaging

Achieved by:

- Purchasing in bulk e.g. site gases and diesel fuel therefore lessening the need for delivery vehicle movements which offers its own benefits such as the reduction in transport;
- Encouraging suppliers to deliver bulk orders on pallets, seal wrapped and not in individual boxes;
- Having orders delivered in returnable containers;
- Where the above is not achievable ensuring all such packaging as cardboard, paper, pallets etc. are recovered for returning or recycling by being placed into the appropriate skips;
- The reduction in postage by having all locations connected to a broadband system for e-mails and the placing of orders;

### Minimisation of Energy and Water Consumption

The following Procedures are included within the Company Environmental Management System and relate to every location.

- All processes and procedures being examined to determine how energy is being consumed and by how much including:
  - Diesel and petrol fuel in company vehicles and site plant;
  - All categories of oils;
  - Light, heat and power;
  - Telephone calls;
  - Use of company cars.

To ensure energy use is being recorded the following procedures will be undertaken:

- All diesel fuel for site plant and generators will be recorded by the fuel delivery company who will provide printouts of the delivered fuel;
- All site water usage will be recorded from meter readings;
- Any electrical usage will be recorded from meter readings;
- Diesel fuel for company commercial vehicles will be recorded as they are filled from the company owned fuel pumps at the transport centre;
- All fuel used by company cars will also be recorded;

Objectives and targets will then be set to reduce energy consumption and produced waste by such means as:

- Reducing vehicle movements and increasing public transport use;
- Use of multi load deliveries;

## Health, Safety & Environment Policy

- Switching off power and light when not required;
- Using low energy light bulbs;
- Installing thermostats on heating and air conditioning systems;
- Installing lighting that turns off or reduces when no movement is detected;
- Car sharing schemes;
- Secondary use of stationary;
- Reviewing the purchasing of company cars and fleet vehicles to favour low carbon emission rated vehicles;
- Materials and consumables stock control;
- Not allowing plant or vehicles to be left idling.
- Detailed assessments of the waste being produced and assess how that level can be reduced by continuous improvement in the setting of objectives and targets;
- Keeping detailed records of energy consumed via meter readings.


### Company Business Continuity and Disaster Recovery

For the purpose of this plan a disaster shall be defined as any event, (e.g. fire, explosion, escape of hazardous substances, pandemics, incident from adjacent railway and bad weather), which requires evacuation of premises and the attendance of the Emergency Services. There will be substantial disruption to normal business in its aftermath requiring mobilisation of significant internal and external resources.

To ensure that the function of the Head Office operations is maintained as far as possible all the actions as identified within the Company [Business Continuity plan](#) will be implemented to minimise disruption by the designated people.

Once the Head Office site has been given clearance by the Emergency Services the appointed persons from the Disaster Recovery Team working from other local facilities or onsite temporary accommodation will undertake the management of such issues, including:

- Liaising with any insurance investigators and assessing what is salvageable;
- Creating an inventory of salvaged items and protecting those items in a selected store area;
- Organising and managing all debris clearance and waste removal;
- Organising, implementing and managing all sub-contract and supplier requirements to make areas safe for future works;
- Commissioning an investigation into the cause of the incident and issuing a report on the findings.



**Ben Williams**  
**CEO**  
August 2024