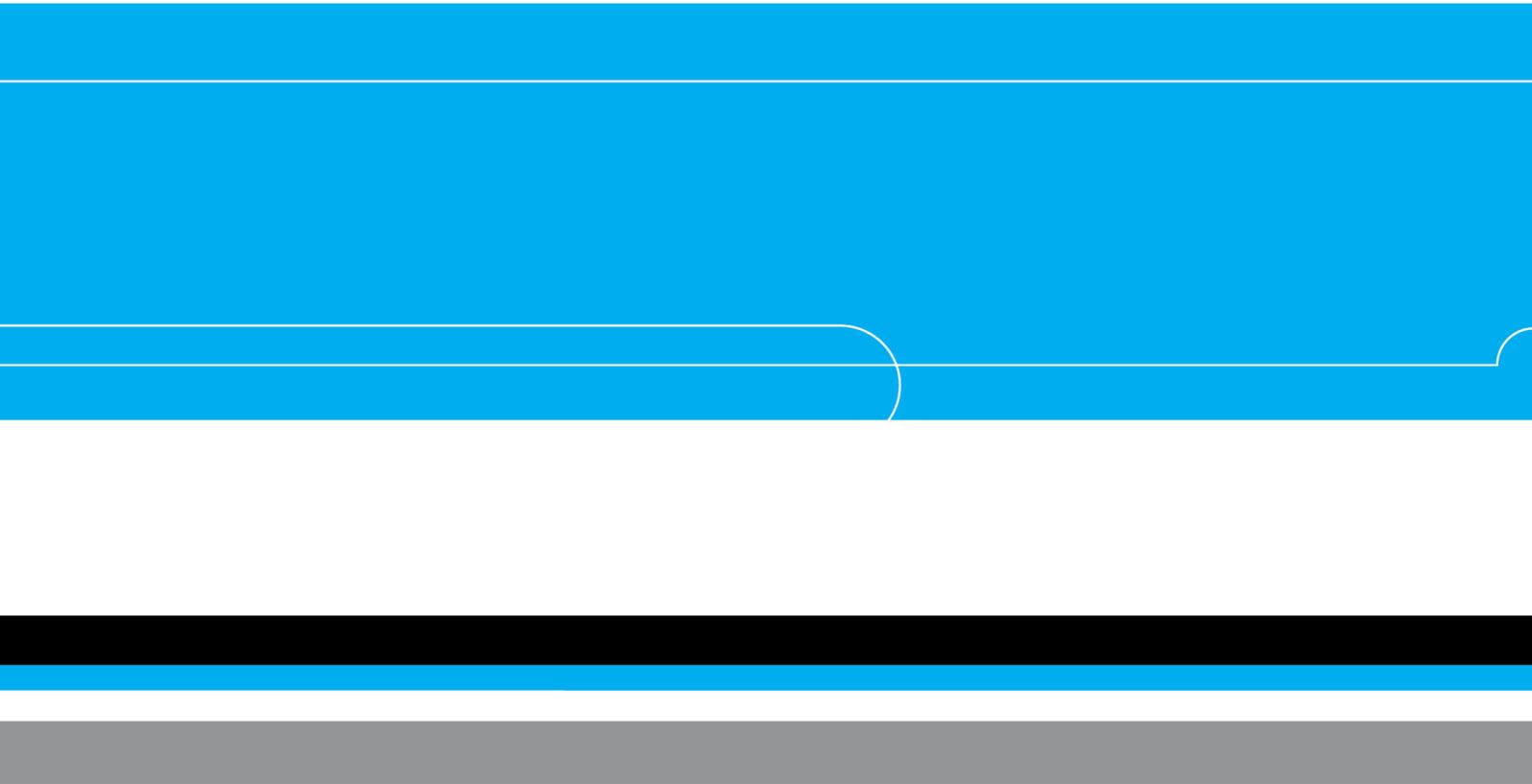


Health & Safety Policy and Practice

September 2017



HEALTH & SAFETY POLICY STATEMENT

VolkerStevin is a major construction and engineering company operating in the United Kingdom. We seek to proactively manage and control all aspects of health and safety associated with organisations activities to prevent injury and ill health to our employees and those not in our employ.

This statement of policy, and the organisation and arrangements for its implementation, have been prepared to comply with section 2(3) of the Health & Safety at Work etc. Act 1974. Further arrangements for its implementation are detailed within VolkerStevin company processes, procedures, and site management plans.

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

VolkerStevin will treat the need to prevent accidents, injuries and ill health to employees and others affected by its work as a priority, VolkerStevin's policy is to take all reasonable steps to prevent work related accidents and ill-health, and to support the general health and well-being of its employees.

VolkerStevin is committed to the continual development of a positive health and safety culture achieved by providing adequate resources and encouraging the participation of all employees.

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

VolkerStevin's policy is to take all reasonable steps to prevent work related accidents and ill-health, and to support the general health and well-being of its employees.

To implement this policy, VolkerStevin will:

- Ensure the effective planning of Health and Safety through the assessment of risk carried out in line with the hierarchy of control.
- Provide appropriate information, instruction, training and supervision in accordance with the relevant statutory provisions.
- Learn from accidents and incidents and implement prevention and / or control measures where practicable.
- Build on existing arrangements to ensure we meet our legal obligations to protect the health, safety and wellbeing of our employees.
- Manage return to work after sickness certification and, wherever possible, support rehabilitation after prolonged illness
- Provide employees with information and services to help them take personal responsibility for maintaining and improving their own health.

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

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

This policy will be reviewed annually and revised as often as may be deemed appropriate by VolkerStevin, and then brought to the attention of all employees. It is accessible to interested parties via the VolkerStevin website, reception areas or is available on request.

Rob Coupe
Managing Director
September 2017

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Health & Safety Policy and Practice

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1. PURPOSE

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

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

2. SCOPE

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

Formal amendment to this document is the responsibility of the Head of HSEQS with the approval of the VolkerStevin board of directors. This document will be brought to the notice of all employees. Staff appointed responsible for the management and implementation of health and safety requirements will ensure that at least one copy is available on each site.

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

3. INTRODUCTION

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

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

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

Formal amendment to this document is the responsibility of the Head of HSEQS with the approval of the VolkerStevin board of directors. This document will be brought to the notice of all employees. Staff appointed responsible for the management and implementation of health and safety requirements will ensure that at least one copy is available on each site.

4. ORGANISATION AND ARRANGEMENTS**Arrangements for Implementation of this Policy**

- Providing and communicating clearly defined information including safe systems of work.
- Making due allowance at tender stage to ensure that sufficient resources and competent persons are provided for the management of health and safety at work.
- Paying particular attention to the provision of safe access and egress
- Selecting and training personnel
- Providing such information, instruction, training and supervision as necessary to personnel at all levels, paying particular attention to personnel attending a location for the first time or on a temporary basis
- Controlling hazardous substances
- Ensuring the receipt of timely, adequate information from subcontractors and suppliers in respect of health and safety planning
- Identifying hazards and assessing the risks to health and safety in the workplace together with the provision and maintenance of adequate control measures
- Making arrangements for consultation between management and employees
- Providing appropriate plant and equipment which is tested, certificated and safe to use
- Displaying and communicating such written or pictorial information as may be necessary to assist in the implementation of safe practices
- Maintaining high standards of hygiene, cleanliness and housekeeping

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4. ORGANISATION AND ARRANGEMENTS (CONTINUED)

Arrangements for Implementation of this Policy (Continued)

- Identifying workplaces which may be difficult to evacuate in an emergency and providing control measures
- Establishing emergency procedures and ensuring they are under the control of competent personnel
- Reporting and investigating accidents, disseminating findings and where appropriate revising arrangements and procedures
- Ensuring adequate and appropriate protective equipment is provided
- Ensuring the occupational health and mental well-being of employees
- Carrying out appropriate health surveillance
- Monitoring and reviewing performance

Responsibility for Health and Safety

BS OHSAS 18001:2007 uses the term ‘top management’ to identify a number of key responsibilities with regard to health and safety management. The roles that fall within VolkerStevin’s ‘top management’ for Health and Safety are shown below.

- Managing Director
- Project / Contracts / Business Directors
- Commercial Director
- Head of Health, Safety, Environment, Quality and Sustainability (HSEQS)
- Quality Manager
- VolkerWessels UK Corporate Responsibility Director (CR)

Top Management Responsibilities for Health and Safety include:

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

Different roles have varying levels of authority with regard to our safety management system, and are explained as follows:

Managing Director (MD)

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

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4. ORGANISATION AND ARRANGEMENTS (CONTINUED)**Project / Contracts / Business Directors**

Report to the Managing Director and are responsible for:

- The safe delivery of all VolkerStevin contracts
- Overseeing and supporting the effective implementation of the IMS
- Liaising with clients
- Training, supporting and mentoring their direct staff to develop their knowledge / application of the IMS
- Providing good health and safety leadership, encouraging safe behaviour and active participation of workers in improving health and safety
- Direct management under their control to implement the Health & Safety Policy
- Liaising with the company's appointed health and safety management to ensure proper communication exists at all levels
- Ensuring adequate planning is undertaken to provide appropriate resources, training and safe systems of working
- Ensure the provision of this policy is kept under review having regard to changes in legislation, best practice and the company's business
- Treating the health and safety of persons under their control as a matter of the highest importance

Head of Health, Safety, Environment, Quality and Sustainability (HSEQS)

For the purposes of clarification under BS OHSAS 18001:2007, health and safety management is not outsourced. The dedicated Head of HSEQS will be directly employed by VolkerStevin.

The appointed VolkerStevin Management Representative for safety, health and wellbeing, and has the authority to take any action necessary to ensure that these are maintained. They are responsible for ensuring effective implementation of the IMS and as a technical specialist provide support, guidance and training. Reporting to the VolkerStevin Managing Director, responsibilities include:

- Ensure the effective use of the CR department and its' resources
- Assist the Managing Director in setting realistic goals for the continual improvement in risk management and reduction of accident / incident rates
- Develop and monitor the IMS to achieve the goals set
- Ensure, in conjunction with the Corporate Responsibility Team, that VolkerStevin health and safety management documentation is appropriate and maintained to reflect any changes in legislation and company requirements
- Ensure the company is audited against the standards detailed in the IMS
- Play a key part in improving the health and maintaining the safety of employees, people working on our behalf, and any other parties affected by our activities
- Inform, guide and support the business in creating workplaces with a positive health and safety culture
- Represent VolkerStevin in communications with the Health & Safety Executive, and other external enforcing authorities or organisations
- Ensure that reports are compiled where necessary to enable corrective action to be implemented by site management
- Ensure thorough investigation is made and appropriate records are compiled where accidents and incidents occur, and make recommendations to prevent recurrence
- Advise on health and safety training requirements
- Maintain their competence through continual professional development
- Adhere to the professional code of conduct as set through membership of the Institute of Occupational Safety and Health (IOSH) and / or the International Institute of Risk, Safety Management (IIRSM) or the Association for Project Safety (APS).
- Identify opportunities for improvement.

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4. ORGANISATION AND ARRANGEMENTS (CONTINUED)**Health, Safety, Environment, Quality and Sustainability Team (HSEQS)**

Report directly to the Head of HSEQS and are responsible for ensuring effective implementation of the IMS. Their duties include:

- Regular site visits and monitor of performance in relation to the policy and procedures
- Carrying out audits and inspections in accordance with company procedure Q03 *Audit* to ensure compliance with existing requirements and identify any areas for improvement.
- Supporting the site teams to carry out compliant projects
- Supporting the site teams in carrying out investigations
- Training advice and guidance
- Advising site teams on HSEQS documentation

Site Management - Contracts / Project / Works Managers, Site Agents

It is the responsibility of site management to:

- Be familiar with and observe all relevant statutory provisions applicable to construction and related industries
- Provide an overall Site Management Plan (SMP) for each project
- Ensure adequate assessment of risk is carried out
- Ensure safe systems of work and method statements are produced, followed and reviewed
- Make sure communication, cooperation and coordination takes place between the various parties who may share the workplace / site
- Ensure activity and / or substance-specific assessments under the Control of Substances Hazardous to Health (COSHH) Regulations are made and communicated to those at risk
- Ensure employees, self-employed, temporarily employed, trainees and non-employed persons have received adequate training and information about the activity they are required to undertake
- Ensure an appropriate induction is provided for those attending a location for the first time
- Ensure employees are aware of the company's policy for health & safety at work and that they have understood its requirements
- Support initiatives for health and safety representation
- Ensure suitable protective equipment is provided, maintained and used
- Report all accidents and incidents to the appointed Health & Safety Manager / Advisor, carry out investigations, make recommendations to prevent recurrence and ensure this information is effectively communicated
- Arrange 4-weekly HSEQS meetings, where applicable, with the appointed Health & Safety Manager / Advisor
- Ensure that weekly safety inspections are carried out, including maintenance of appropriate inspection records
- Ensure adequate procedures are made for the safe evacuation of workplaces and that they are under the control of competent personnel
- Implement the advice given by the company's appointed Health & Safety Manager / Advisor
- Attend health and safety training arranged by the company

Site Supervisors - General Foremen, Foremen, Gangers

It is the responsibility of site supervisors to:

- Ensure operatives are suitable, competent, trained and authorised to carry out the work or operate the plant required for the task. Provide effective front-line supervision on site and ensure operatives are instructed in the detail of safe systems of work as it applies to particular construction operations
- Encourage the workforce to work in a safe and tidy manner,
- Ensure the workforce wear any personal protective equipment required for the operation.
- Be familiar with and observe all relevant statutory provisions applicable on site and take immediate action in respect of advice given by the company's appointed Health & Safety Manager / Advisor
- Cooperate and liaise where appropriate with other contractors' site supervisors

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4. ORGANISATION AND ARRANGEMENTS (CONTINUED)**All employees, subcontractors and any other persons working on our behalf**

It is their responsibility to:

- Be familiar with the VolkerStevin Health & Safety Policy and cooperate with management / supervision in its implementation
- Understand the parts of the Health & Safety Policy applicable to them and take reasonable care for the health and safety of themselves and others
- Follow the instructions given regarding safe working in general and safe methods of work for particular tasks
- Keep equipment in good order, use the correct equipment for the task, and report any defects in plant and equipment or any shortcoming in safe systems of work to their manager / supervisor
- Contribute to the safety culture, be aware of relevant site safety rules and abide by requirements
- Use and not abuse the protective equipment and measures provided in the interests of health and safety

Corporate Responsibility Director

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

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

Integrated Management Systems (IMS) Managers

Reporting to the Corporate Responsibility Director they are responsible for:

- Establishing the IMS requirements in line with BS OHSAS 18001:2007
- Working with the Corporate Responsibility Director and HSEQS teams to ensure legal, sector specific, and other requirements are integrated within the IMS
- The coordination of activities related to the implementation, development and maintenance of the IMS
- Control, publishing and maintenance of the IMS within Workspace (our business management system)

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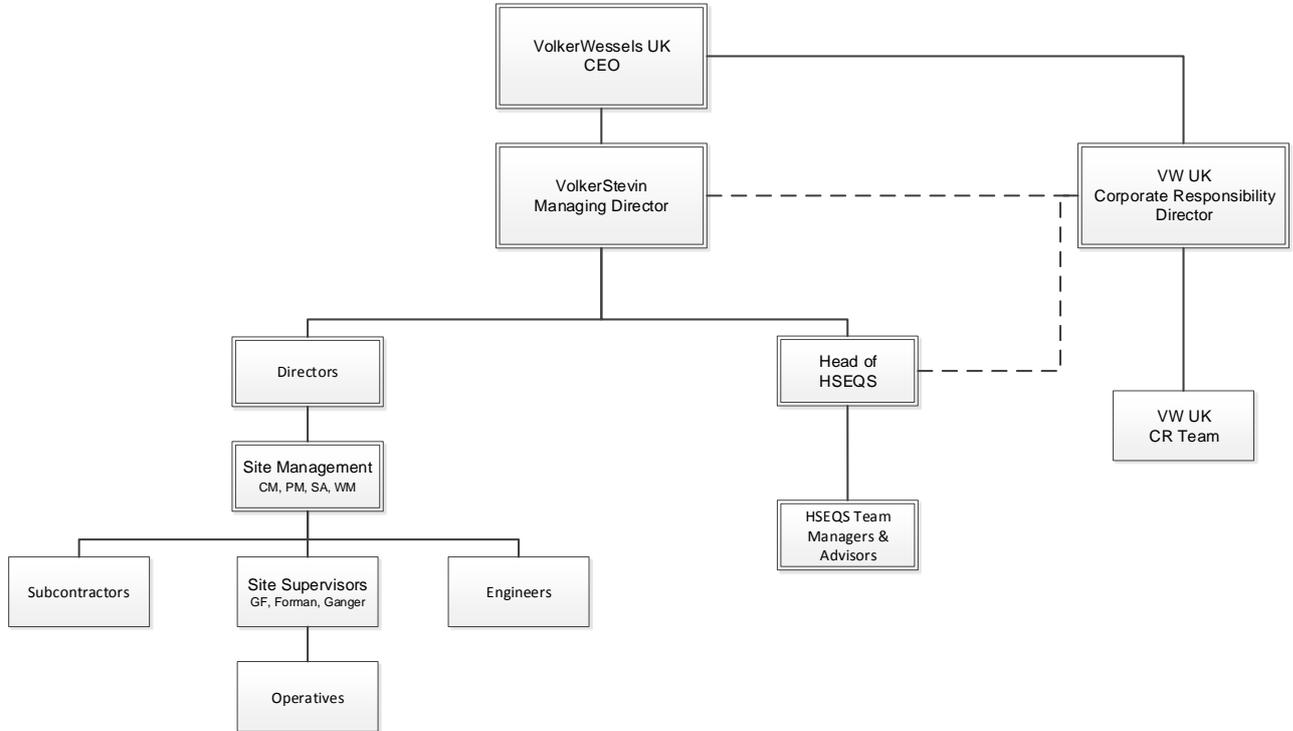
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4. ORGANISATION AND ARRANGEMENTS (CONTINUED)

Organisation and Structure

The company is managed by the board of directors, with the structure for health & safety management as detailed below:



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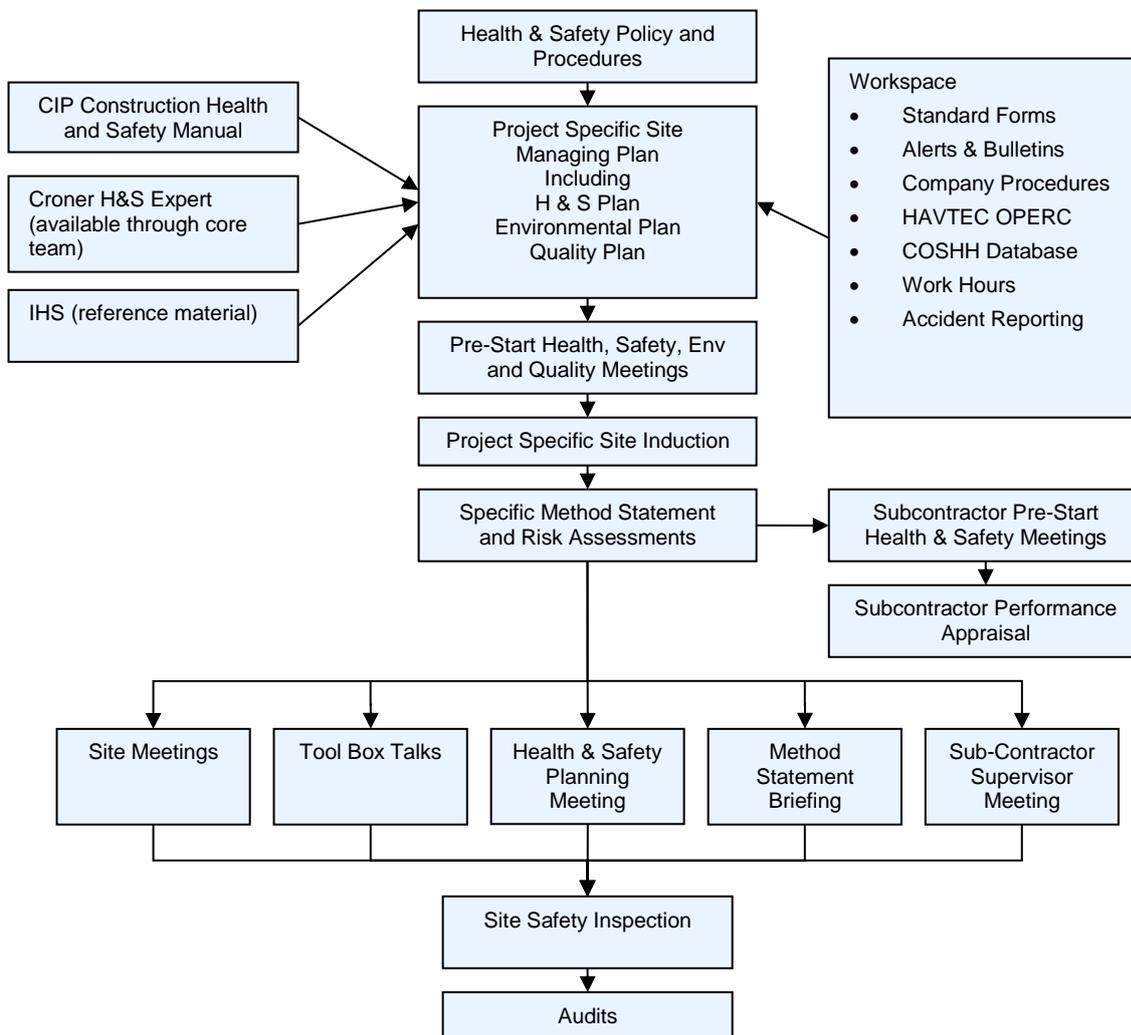
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4. ORGANISATION AND ARRANGEMENTS (CONTINUED)

Structure of Safety Management System

The company IMS is used to support the implementation of the policy and is stored on 'Workspace', our document control system which can be accessed via Insite the VW UK intranet which provides access to:

- Policies and procedures
- Site documentation
- Health and safety (HSE) forms
- Alerts and bulletins
- Health and safety objectives and targets
- RIDDOR performance
- Best practice guidance



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4. ORGANISATION AND ARRANGEMENTS (CONTINUED)**Monitoring and Review**

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

- Internal and third party inspection, audit and monitoring
- Safety performance monitoring (hazards, near misses, accidents, incidents)
- Comparison with current, new and proposed legal requirements or best practice
- Meetings carried out with directors, senior managers and health and safety management

Training

Appropriate training will be identified and provided to all levels and may include inductions, toolbox talks, risk assessment and method statement briefings, in-house training courses and specialist external training courses

Training requirements are assessed on an on-going basis through Personal Development Reviews.

Training requirements are assessed both at commencement for new employees, and on an on-going basis for existing employees. The capabilities and expertise of our management / supervisory employees is assessed at safety management meetings and Personal Development Reviews. Operational employees' training is assessed at site induction by supervisors on site, during working operations and during tool box talks, when two-way discussion is encouraged.

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

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

Inductions will follow the process described within *H54 Inductions*

Training records are maintained by the VW UK Training Department

Plant and equipment operators are required to provide evidence of training and competency e.g. CPCS card

The company is fully committed to a fully qualified and certificated workforce and supports the Construction Skills Certificate Scheme (CSCS) along with other industry approved registration schemes. It is our aim to have 100% of the workforce holding CSCS cards or an approved equivalent.

Classification of Workforce

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

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

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

5. RISK ASSESSMENT AND HEALTH & SAFETY PLANNING**Assessment of Risk**

Risk assessment is the responsibility of the relevant manager for sites, offices and operational locations with the assistance of the HSEQS Team.

The principles of prevention to be applied are as follows:

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

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

The Company Approach

VolkerStevin has produced a company standard risk assessment chart to assist in highlighting hazards and significant risks associated with construction, along with references to existing health & safety guidance. This chart and its contents do not constitute risk assessments. Its aim is to aid the identification of risks requiring detailed assessment.

The company standard risk assessment chart is completed and reviewed at a health & safety planning meeting which is arranged prior to the commencement of site activities. The arrangements to safely execute the works are examined and planned. Within this process significant attention is paid to hazards and risks associated with the works. Where a significant risk has been identified in the chart, a specific assessment shall be produced. Preventive and protective measures must be established, recorded and communicated to all relevant employees, and their ongoing effectiveness monitored and reviewed.

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

Residual risk following the implementation of control measures to reduce risk to as low as reasonably practicable (ALARP) shall be reviewed as the works are executed.

VolkerStevin initiate the risk assessment process at tender stage by the instigation of H02-01 *Overall Project Risk Assessment*. This document is then passed to the site team at contract award.

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

Regulations requiring risk assessment are considered and reviewed at the HSEQS planning meeting and throughout the contract period and include, but not limited to

- Manual handling
- Personal Protective Equipment
- Display Screen Equipment
- Noise at work
- COSHH
- Asbestos
- Lead
- Hand Arm Vibration
- Whole Body Vibration
- Work at height
- Fire

HSEQS Planning Meeting

Prior to construction commencing or within 2 weeks of contract start a HSEQS planning meeting shall be held to discuss formulation of a Health & Safety Plan as part of an integrated Site Management Plan (section 2 of the SMP) and its subsequent implementation. This meeting will be attended by the contracts / project / works manager, agent, appointed members of the HSEQS team and others as appropriate.

The hazards and risks identified in the pre-construction information shall be assessed and developed where the Construction (Design and Management) Regulations 2015 apply.

Activities which are likely to produce significant risks requiring specific risk assessments, and those areas of construction operations which are likely to require detailed method statements, shall be identified and recorded on the RAMS Register.

Section 2 of the SMP shall be further developed with the pre-construction information and any items identified at the HSEQS meeting. This will include details of consultation arrangements with employees.

Specific assessments shall also be considered at this meeting to address COSHH, noise, PPE, manual handling etc. and shall be included in the respective method statement or compiled and maintained separately.

On a four weekly basis site safety meetings will be held to plan, monitor, review and update the health and safety systems on site.

Management of Subcontractors

All subcontractors with 5 or more employees engaged by VolkerStevin shall be accredited to Constructionline. In addition the companies must have a Safety Schemes in Procurement (SSIP) accreditation. (E.g. CHAS, SafeContractor, Acclaim, etc.)

All tender enquiries and orders to subcontractors will include P03-03 *Subcontractors Policy Document* which includes VolkerStevin's HSEQS requirements.

As part of the Pre-order Subcontract Management Meeting it shall be emphasised to the subcontract representative or manager of the VolkerStevin expectations in regard to full cooperation in achieving the required health and safety standards.

Prior to commencing any work on site those subcontractor employees carrying out the work will attend a subcontract pre-start health and safety meeting to plan and develop safe systems of work for the identified scope of works.

At regular intervals VolkerStevin site management will convene meetings with subcontractors to discuss safety performance. These meetings will provide an opportunity for subcontractors to make an input into the safe management of the site.

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6. COMPANY HEALTH & SAFETY PROCESSES**Procedures and Site Rules**

The VolkerStevin procedures are located within the IMS and stored on 'Workspace', our document control system which can be accessed via Insite the VW UK intranet.

Each contract will have a site specific SMP which will detail those processes and procedures applicable to that contract including any requested by the client.

This section defines the standards and rules, which complement VolkerStevin company procedures, CIP construction Health & Safety Manual and Site Management Plans. It is the responsibility of all employees to observe these rules, to behave in a safe and reasonable manner, and to adhere to all instructions given by appointed management with regard to the respective location.

Failure to comply with this policy and associated processes and procedures will render employees liable to disciplinary action. This may be through use of the 'Record of Verbal Warning' notices. It should also be borne in mind that a breach of health & safety legislation is a criminal offence and action taken by an enforcing officer may result in heavy penalties i.e. fines and / or imprisonment.

Safety is the responsibility of everyone, all persons have a responsibility to contribute towards making their place of employment a safe place to work. Safety measures are introduced to control risks to everyone at the location, including employees, subcontractors, visitors, members of the public and anyone else who could be harmed.

Site Rules - Health and Safety

VolkerStevin site rules are located within the SMP and are amended to be contract specific. They comprise the following as a minimum, and are applicable to all contracts:

- All persons having any business on site must attend an induction and receive and understand a copy of the site rules
- All persons must report to the site office and sign in before entering the site, and sign out on leaving the site
- All persons on site must wear a safety helmet, protective footwear and high visibility clothing at all times (the site offices and welfare facilities are excluded from this rule)
- Trainers will not be permitted at any time. Visitors shall be made aware regarding protective footwear, but may be exempt if agreed and accompanied by site management
- The correct task specific personal protective equipment must be worn at all times, e.g. gloves, goggles, masks, ear defenders, etc., and also in accordance with any local rules
- Unauthorised personnel must not alter scaffolding
- No one is to operate vehicles, plant or machinery, including fitting abrasive wheels and erecting or dismantling scaffolding unless they are appropriately trained or suitably qualified, e.g. CPCS or similar and authorised in writing by VolkerStevin, (*HSE-23 Permit to Operate Plant*). This is a VolkerStevin zero tolerance issue, unauthorised persons operating plant will be removed from site
- Excavator operatives who are found to have incorrectly fitted a bucket onto the quick hitch system and not ensured that all associated safety devices are correctly fitted will be removed from site. This is a zero tolerance issue
- Failure to wear a suitable harness and lanyard connected to a safe attachment point is a zero tolerance issue
- The use of hand held mobile phones while operating plant / vehicles whilst on site is prohibited, except if parked up and the engine switched off
- Defective vehicles (including Light commercial & HGV), plant or machinery must not be used at any time and the defect(s) should be brought to the attention of the site management immediately
- No person under the influence of drugs or alcohol will be permitted to remain on site
- Welfare facilities are to be kept clean and tidy at all times
- Warning signs must be obeyed at all times
- All hazards, near misses, accidents and dangerous occurrences must be reported to the site office, and all injuries entered in the accident book

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6. COMPANY HEALTH AND SAFETY PROCESSES (CONTINUED)**Site Rules - Health and Safety**

- Operatives using any equipment producing a naked flame or sparks must have within arm's reach a suitable fire extinguisher. The operative must also be in the possession of a Hot Works Permit
- A Permit to Work is required for any person entering a confined space
- A Permit to Dig is required every time before breaking the ground surface
- A Permit to Dive will be required for any diving operation regardless of depth of water
- Only certificated and authorised personnel will be allowed to sling loads or direct cranes
- Drivers of all excavators and reversing vehicles must have good all round visibility or be supervised by a banksman
- It is incumbent upon all operatives to work in a safe manner and not to endanger themselves or other persons by their actions
- Portable electric tools and equipment shall only operate at 110 volt power or lower, and wherever possible use RCD protection
- 220 volt electrical equipment that is used within a workshop environment will be permissible, subject to a risk assessment being carried out specific to the use of this type of electrical equipment
- No radios on site
- All materials used on site which have a hazard symbol on the container / bag, must have a COSHH assessment sheet, which should form part of the Method Statement. We encourage the use of, where possible, materials that are non-hazardous and friendly to the environment
- All pedestrian and vehicle control signs must be complied with
- No persons are permitted to be underneath any unprotected overhead activities
- Permits to work are required for specific high risk activities. Work must not commence until the relevant permit to work has been issued.

Accident and Incident Reporting

H07 *Investigation and Reporting of Accidents, Incidents and Near Misses* shall be followed.

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

All accidents and incidents, diseases, dangerous occurrences and damage to property belonging to VolkerStevin or others, shall be reported to site management as soon as possible. Site management shall then report to the appointed Health & Safety Manager / Advisor as soon as it is practicable, so that they may be thoroughly investigated to prevent a recurrence.

All injuries, diseases or dangerous occurrences suspected of being covered by RIDDOR must be notified to the relevant enforcing authority and appointed Health & Safety Manager / Advisor as soon as practicable.

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

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

The Corporate Responsibility Director in certain situations may request a formal investigation to be carried out for some accidents and incidents that would ordinarily be treated as local investigation. The Corporate Responsibility Director expects to draw important lessons from a formal investigation.

Formal investigations will be completed by a representative of the HSEQS Team and documented using H07-02 *Accident Incident Near Miss HSEQS Investigation Report*.

Records of accidents, direct employee including subcontract and site personnel numbers, and total hours worked are to be included in Q20-06 *Monthly HSEQ Report* for company safety performance measurement.

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Health & Safety Policy and Practice

Issue 5.1, September 2017

6. COMPANY HEALTH AND SAFETY PROCESSES (CONTINUED)**Drugs and Alcohol Policy**

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

All employees, those working on our behalf, and visitors to VolkerStevin sites or offices must be aware of the requirements of the VW UK Drug and Alcohol Policy, and the implications of failing to comply, as part of the site or office induction process.

The *VolkerWessels UK Drugs and Alcohol Policy* is available to all employees on Workspace and copies can be provided on request.

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

- **Pre-employment (rail) and new employee screening** - all safety-critical rail candidates (e.g. Personal Track Safety (PTS) card holders) must undergo a medical and screening for drugs and alcohol prior to employment in accordance with rail industry standards. All other new employees must undergo screening for drugs and alcohol as soon as practicable after their start date
- **Random** - unannounced random drugs and alcohol screening could take place at any time whilst at work or on duty of any employee, subcontractor, self-employed or agency worker. A minimum percentage of personnel will be subject to unannounced random alcohol and drug screening each year
- **For Cause** - screening to find out whether drugs or alcohol was a factor in an accident or incident, where the person(s) actions or omissions are suspected of contributing to the accident or incident, or the behaviour of the person gives cause to suspect that person is unfit to continue work
- **Transfer or promotion** - any employee who is transferred or promoted to a safety critical post will be screened for drugs and alcohol, even if the employee already holds a safety critical post

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

Control of Substances Hazardous to Health

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

COSHH is specifically addressed at internal and subcontractor pre-start meetings with COSHH assessments forming an integral part of the safe systems of work, and are produced through our internal COSHH database in HSEQ Online.

Construction (Design and Management) Regulations (CDM)

VolkerStevin recognises their responsibilities under the Construction (Design and Management) Regulations 2015.

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

Project specific arrangements are described in the Site Management Plan.

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6. COMPANY HEALTH AND SAFETY PROCESSES (CONTINUED)**Consultation with Employees**

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

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

- The introduction of any measures or new technologies
- Arrangements for appointing competent persons
- Relevant health and safety information
- Planning and organisation of any health and safety training

This will be either directly or through elected representatives.

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

Consultation may be carried out during:

- Inductions
- Tool box talks
- Daily Start of Shift Task Briefing
- Method statement briefings
- Subcontractors' progress meetings
- Four weekly health and safety meetings
- Pre-arranged or ad-hoc meetings following any responses to information posted on notice boards

Emergency Procedures

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

Fire Precautions

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

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

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

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

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

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

First Aid

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

At least one qualified first aider shall be provided at each work location dependent on the risk of injury or ill health. An appointed person shall be identified at each location who may also be a first aider. It shall be the first aiders / appointed person's responsibility to ensure that appropriate first aid equipment / facilities are maintained.

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6. COMPANY HEALTH AND SAFETY PROCESSES (CONTINUED)**Gross Misconduct**

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

- A serious or wilful breach of the safety rules specific to each location
- Failure of a drugs and alcohol test
- Unauthorised removal or interference with any guard or protective device
- Unauthorised operation of any item of machinery, plant or equipment
- Unauthorised removal of any item of first aid equipment
- Wilful damage to, misuse of, or interference with any item provided in the interest of health, safety or welfare at work
- Unauthorised removal or defacing of any label, sign or warning device
- Misuse of chemicals, flammable or hazardous substances, or toxic materials
- Smoking in any designated 'No Smoking' area
- Smoking whilst handling flammable substances
- Horseplay or practical jokes which could cause accidents
- Making false statements or in any way deliberately interfering with evidence following an accident or dangerous occurrence
- Misuse of pneumatic, hydraulic or electrical equipment
- Dangerously overloading any item of lifting equipment
- Overloading or misuse of any vehicles

Health

Elements of VolkerStevin's Occupational Health system include:

- **Pre-employment health questionnaire** to ensure they are fit and capable for effective performance at work without risk to health
- **Management of work activities to eliminate / reduce risks to health**, including planning, organisation and risk assessment
- **Health surveillance** to evaluate whether there are any adverse effects the work or working environment are having on the individual and to act upon the earliest signs of possible harm
- **Assessment of fatigue**, as it is a significant risk during construction activities due to the safety critical nature of the work. The risk of accidents from cumulative fatigue is well recognised
- **Consideration of new and expectant mothers** - see *VolkerWessels UK Employee Handbook*. The Human Resources Department will notify the Company Occupational Health Nurse. Risk assessment will be carried out on the individual employee concerned

Lone Working

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

Manual Handling

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

- Where practicable the need for manual handling shall be eliminated
- Manual handling assessments need to address task, load, work environment and the individuals capability
- Mechanisation of repetitive operations (i.e. kerbs, cable troughing etc.) will be adopted as the solution requires

6. COMPANY HEALTH AND SAFETY PROCESSES (CONTINUED)**No Smoking Policy**

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

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

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

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

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

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

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

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

Notices and Written Instructions

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

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

Office / Work Place Safety

- Electrical installations shall only be installed by a competent person and tested at regular intervals in accordance with the Electricity at Work Regulations.
- Offices shall be kept at a reasonable temperature, be well ventilated and lit.
- Passages and stairs shall be kept clear of obstructions and well lit.
- Flooring shall be kept in a safe condition. Damaged carpeting, liquid spillages etc. shall be reported to management.
- Filing cabinets shall be loaded from the bottom drawers first and only one drawer opened at a time. Storage racking shall be of adequate strength, properly loaded, stable, and securely fixed where possible.
- Great care shall be taken in the storage and use of toxic, flammable and corrosive substances, chemicals and liquids. They shall be stored and used in accordance with the manufacturers’ instructions / COSHH assessment.
- Portable electric tools and equipment shall operate at 110V or lower. Where this is not possible RCD protection shall be used.
- Electrical equipment shall be visually inspected and checked for defects at regular intervals and, if a fault is suspected, taken out of use and checked by a qualified electrician. Trailing electric cables shall be avoided.
- An appropriate maintenance system (e.g. HSE guidance) shall be established for all electrical equipment and records of inspection and testing maintained as necessary.
- Employees who are considered to be display screen equipment users (through DSE assessment) shall be entitled to free eyesight tests and the provision of corrective eyewear if prescribed.
- DSE users will be provided with suitable equipment to establish an ergonomic workstation. Suitable instruction on its adjustment will be provided.
- Adequate welfare facilities shall be provided.
- All dangerous parts of machinery shall be adequately guarded.

6. COMPANY HEALTH AND SAFETY PROCESSES (CONTINUED)**Permits to Work**

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

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

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

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

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

Permits will be required for the following activities:

- HSE-21 *Confined Space - Entry Permit*
- HSE-23 *Permit to Operate Plant*
- HSE-24 *Permit to Dig*
- HSE-27 *Hot Works Permit*
- HSE-53 *Steps and Ladders Permit*
- H55 *Control of Lifting Operations, Equipment and Accessories*
- HSP-021B-04 *Permit to Work - Low Voltage*
- HSP-021B-05 *Limitation of Access*
- Q25-15-VS *Permit to Load*
- Q25-16-VS *Permit to Excavate*
- Q25-17-VS *Permit to Strike / Remove*

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

Personal Protective Equipment (PPE)

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

- Protective equipment shall be used, stored and maintained in accordance with manufacturers' instructions and the training provided
- Any damage, loss, fault or unsuitability of protective equipment shall be reported to management
- VolkerStevin will issue suitable protective equipment to directly employed staff and operatives, and undertake to replace such equipment whenever necessary
- PPE Equipment Items contained in the VolkerStevin PPE catalogue have been approved for use by the Head of HSEQS. Any additional PPE items required shall be approved by the Head of HSEQS prior to the placement of any order.
- VolkerStevin do not permit "Rigger" type boots on any of their contracts.
- Light Eye Protection (LEP) and gloves are mandatory on all VolkerStevin sites.

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6. COMPANY HEALTH AND SAFETY PROCESSES (CONTINUED)**Plant and Work Equipment**

VolkerStevin requires all plant and equipment used on site to comply with the Provision and Use of Work Equipment Regulations, and the Lifting Operations and Lifting Equipment Regulations as applicable.

All work tools, plant and equipment must be suitable for the purpose for which it is intended and must be procured via VolkerBrooks Ltd.

To be able to work as safely as possible it is essential that work equipment is maintained and inspected by a competent person, in accordance with legal requirements and manufacturers' recommendations.

Records of inspection, test and thorough examination are required to be maintained.

Operation of any machine, plant or equipment is not permitted unless employees have been trained, authorised, or is under adequate supervision.

Operatives must not use mobile phones or 'hands free' whilst operating plant.

All machine guarding shall be utilised.

Any fault, damage, defect or malfunction of any machinery, plant, equipment, tools or guards shall be reported to management for action, which may include taking the item out of use.

Repair, maintenance or cleaning of machinery, plant or equipment shall only be carried out in accordance with manufacturers' recommendations and risk assessment where appropriate.

No machinery, plant or equipment shall be left in motion, or with the engine running, whilst unattended. Plant and vehicles must be immobilised and the ignition key removed whilst unattended, keys must be kept in a secure place when not in use.

No repairs or maintenance work on any equipment shall be undertaken unless employees are trained and authorised to do so, including changing of abrasive wheels.

Vibration

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

It is necessary to limit exposure to Hand Arm Vibration using the following methods listed in order of priority:

- Eliminate the hazard by substitution i.e. use of machine mounted breakers, crushing concrete, diamond drilling etc.
- Use of low vibration equipment in preference to standard tools
- Reduce the length of exposure, for example through job rotation

These preventative measures need to be applied in conjunction with the provision of information and training for workers and their supervisors together with the introduction of health surveillance.

The specific control measures to limit exposure to vibration needs to be documented in a risk assessment which clearly defines measures to reduce or prevent exposure.

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

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6. COMPANY HEALTH AND SAFETY PROCESSES (CONTINUED)**Vehicles**

- Regular checks of vehicles, in conjunction with company procedures and manufacturers' recommendations, shall be carried out prior to use.
- Driving or operating any vehicle is not permitted without the appropriate driving licence, competency or authorisation.
- Unauthorised passengers or unauthorised loads shall not be carried.
- Vehicles shall not be used for unauthorised purposes.
- Vehicles shall not be loaded beyond the stated capacity.
- Driving or operating vehicles whilst suffering from a medical condition or illness that may affect ability is not permitted.
- Driving or operating vehicles whilst under the influence of alcohol or any other drug, which may affect operating ability, is not permitted.
- All available safety features such as seat belts shall be utilised.
- Use of mobile phones in vehicles whilst driving is restricted to hands free use only however still avoid making or taking phone calls when driving wherever possible.
- All personnel driving at work will be required to comply with *VolkerWessels UK Driving for Work Policy and Handbook*

Welfare

The company will provide suitable and sufficient welfare facilities as detailed in the Workplace Health, Safety & Welfare Regulations or CDM 2015 regulations as applicable.

Working at Heights

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

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

- AVOID the risk by not working at height - where it is reasonably practicable to carry out the work safely other than at a height do so
- PREVENT falls - where it is not reasonably practicable to avoid working at height, you should assess the risks and take measures to allow the work to be done whilst preventing, so far as is reasonably practicable, people or objects falling. This might include ensuring the work is carried out safely from an existing place of work, or choosing the right work equipment to prevent falls
- MITIGATE the consequences of a fall - where the risk of people or objects falling still remains you should take steps to minimise the distance and consequences of such falls. This also involves the selection and use of work equipment
- At all stages give collective protective measures (e.g. guardrails, nets, airbags, etc.) precedence over personal protective measures (e.g. safety harnesses)

6. COMPANY HEALTH AND SAFETY PROCESSES (CONTINUED)**Lifting Operations**

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

H55 *Control of Lifting Operations, Equipment and Accessories* shall be followed for this purpose.

All those involved in the planning, site supervision and carrying out of lifting operations must have the appropriate level of competency for the task being undertaken. VolkerStevin requires that competency checks are undertaken to be assured that all those undertaking roles within lifting operations have the necessary skills, knowledge and experience to carry out their duties.

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

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

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

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

Working Conditions / Environment

- All employees shall make proper use of all safety equipment and facilities provided to control working conditions / environment.
- Work areas shall be kept clear and in a clean and tidy condition.
- All rubbish and waste materials including chemicals or oils within the working area shall be disposed of using the facilities provided, at correct disposal points and in accordance with the details within the appropriate method statements or specific site arrangements.
- Chemicals, oils or other hazardous substances shall not be discharged into watercourses, sewers or drains. Any spillage of liquids shall be correctly contained and removed as soon as is practicable.
- Toilet and messing facilities provided shall be kept clean and tidy.
- Personnel shall inspect their work areas continually to ensure they are safe and that no fire or ignition sources are left unattended during or at the end of each working period. Where the activity being undertaken carries any risk of a fire, fully charged extinguishers and precautions to stop flying sparks i.e. fire blankets / screens shall be in place. Where hot work has been undertaken the area shall be checked and any hot spots doused.
- All materials shall be stored in such a manner as to eliminate hazards.
- Warning signs and suitable precautions shall be provided to protect anyone from falls from height.
- Any person found contravening these requirements shall be subject to disciplinary action.

Work in Rail Environment

VolkerStevin (VolkerGround Engineering Division) hold RISQS accreditation for working in a rail environment. This includes the use of supporting procedures to enable rail work to be conducted safely, efficiently and in compliance with all relevant Railway Group and Network Rail Standards.

Young Persons

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

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

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6. COMPANY HEALTH AND SAFETY PROCESSES (CONTINUED)**Temporary Works**

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

VolkerStevin management of temporary works is described within Q25-VS *Temporary Works Design and Installation*. All projects must comply with the requirements set out within the procedure.

7. IMS AUTHORISATION**Document owner approval:**

Duncan Aspin, Head of HSEQS - 18.09.2017

Approval for IMS:

Angela Saini, Senior IMS Manager - 18.09.2017