

OCCUPATIONAL HEALTH, SAFETY AND ENVIRONMENTAL POLICY

THE HEALTH & SAFETY AT WORK ETC. ACT 1974
ENVIRONMENTAL ACT 1995

July 2007 Edition

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Honesty & Commitment Assured

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INVESTOR IN PEOPLE



Sterling Building Systems Ltd

Under this Act every employer is bound to prepare and keep an up to date written policy statement on the matters enacted by it and to bring the policy to the notice of all employees.

The Director of Sterling Building Systems Limited confirms his commitment to health, safety and environmental issues since this is critical to the success of the business in terms of cost and quality.

The Director also welcomes this opportunity of starting his accepted responsibility towards ensuring the safety, health and well-being of all employees by proper training and the adoption of the best modern practices and safeguards to prevent accidents, reduce hazards and maintain healthy conditions at all places of work. It is further recognised that the Company has a duty to take all reasonable precautions to protect the environment.

The Company's most important asset is the people and it recognises that the health, safety and welfare and that of any third parties affected by its activities is paramount. Equally the Company accepts its responsibilities to minimise environmental impact from its activities by controlling waste, reducing pollution, using energy efficiently and acting as good neighbours.

Apart from the statutory aspect, the general benefits of a vigilant attitude to health and safety at work are reflected in greater efficiency and a more secure feeling for all members of the Company and these aims must be pursued. Employees in their respective tasks are expected to cooperate in observing safe practise and in assisting management to maintain them.

A handwritten signature in blue ink, appearing to read 'M. A. Wallace', with a stylized flourish at the end.

M. A. Wallace FloR

Managing Director

July 2007

INTRODUCTION

The prevention of accidents and ill health is one of the most important functions of Sterling Building Systems Ltd and all its employees.

- We do not want any employee or other person to suffer as a result of our work.
- We intend to comply with all health and safety legislation.
- We recognise that accidents, unsafe and unhealthy working conditions can be a considerable drain on the financial resources of the Company and demonstrate a lack of efficient management.

This document has therefore been prepared to define the way that this company intends to manage occupational health, safety and the environment and to meet the requirements of Section 2 (3) of the Health and Safety at Work etc Act 1974, which requires an Employer to prepare a statement of general policy with respect to the health and safety of employees, the organisation and arrangements set up to carry out the policy.

It has been drawn up taking into account the general duties of the Health and Safety at Work etc Act 1974, which are simply summarised as follows: (Note that this is not a legal interpretation of the Act).

The Employer (Section 2 H&SAWA) must ensure, so far as is reasonably practicable, the health and safety at work of his employees by providing: a safe system of work; safe plant and equipment; safe means of handling, transporting, etc articles and substances; adequate, information, training, instruction and supervision; a safe place of work with safe access to and egress from the place of work; a safe and healthy environment; adequate welfare facilities; arrangements for joint consultation where safety representatives have been appointed.

The employer must also ensure that the way his work is carried out does not, so far as is reasonably practicable, affect the health and safety of persons other than his employees e.g. other contractors, visitors, public.

If the Employer controls a site or premises where other persons are required to work he must ensure, so far as is reasonably practicable, that the site or premises or anything on the site or premises does not present a risk to their health and safety.

Persons who manufacture, supply etc any articles and substances for use at work, or erect or install any plant or equipment, have duties to ensure the health and safety of those who will use etc the article or substance.

Employees (Section 7 H&SAWA) must look after their own health and safety and ensure that they do not endanger others. They must also co-operate with the employer to assist in meeting the statutory requirement.

No person must recklessly or wilfully interfere with anything provided for health and safety.

Failure to comply with these duties or to breach any of the specific regulations for health and safety can lead to prohibition or improvement notices, which will interfere with the progress of work and/or to prosecution of the Company, individual Directors, Managers, Supervisors or Operatives with fines of up to £5000 for each offence on summary conviction or unlimited fines on indictment with up to 2 years imprisonment for certain offences.

Note: that the arrangements refer to appropriate legislation and guidance, which must be applied to our work. Further information and advice on these requirements is available from The Health and Safety Executive guidance booklets and other publications.

SAFETY POLICY

The statement which follows has been prepared in conformity with section 2(3) of the Health & Safety at Work Act 1974 and Management of Health & Safety at work regulations 1992 rev 99 and is subject to revision. The regulations and conditions embodied in it are mandatory for all employees of the Company.

It is the aim of the Directors of the Company to continue and strengthen their long accepted attitude of responsibility towards all matters affecting the health, safety and welfare of all members of the Company together with third parties. This is achieved by proper training and the adoption of best modern practices, to prevent accidents, identifying potential hazards, where the hazard cannot be eliminated ensure the correct control measures are put in place to reduce risk of injury and maintain healthy and safe conditions at all places of work.

The responsibility for safety at work rests upon all employees and the Company will ensure that the policy is pursued throughout the organisation. The Company will take all reasonable practicable precautions to ensure the health, safety and welfare of all its employees by providing:

- a) A safe working environment by design, construction, operation and maintenance of all plant, equipment and facilities.
- b) Safe systems of work, as set out in the extensions of this policy.
- c) Proper information, training, instruction and supervision.
- d) Control of all situations likely to cause damage to property and equipment, as set out in the extensions of this policy.
- e) Effective facilities for the reporting and treatment of injuries, which occur at work.
- f) Effective fire prevention and fire control procedures, as set out in the extension of this policy.
- g) Adequate facilities for consultation between management and employee representatives.
- h) The results will be made available to the Safety Committee.
- i) Specific risk assessments, tests, examinations, samples and records as necessary to monitor the working environment both on site and in the office.

The Company expects its employees to operate strictly in accordance with this policy, to comply with the relevant sections of the Health & Safety at Work Act etc 1974 and to exercise reasonable care for their own health and safety and that of those of others who may be affected by their acts or omissions.

The Company will seek to ensure companies with whom we contract or subcontract have similar high standards.

The overall responsibility for the implementation and monitoring of this Policy is vested in the Managing Director/Safety Director.

The Managing Director at the Annual Management Review meeting shall review the Safety policy.

The Managing Director/Safety Director is responsible for compliance with this policy.

Company Organisation – Contract operations are carried out though the Contracts Manager and they shall be responsible for implementation of this Safety Policy within their designated areas of control. Line responsibilities shall be exercised in accordance with the Organisation Chart shown



All Management Staff shall monitor safety on both a formal and informal basis, as a continuous and ongoing operation. They shall correct minor non-conformances as and when observed. All major contraventions shall require cessation of work and formal notification to the Safety Director/Contracts Manager. Work shall not resume until an agreed safe system of work has been set in place. Clients/Third Parties who may be affected by any risk shall also be informed and consulted as necessary.

General Environmental Policy

The Company will plan, conduct and monitor its operations using the best practical means to project the environment from impairment.

The concepts of Best Practice Environmental Options (BPEO) and duty of care will be implemented to establish high standards of operation in all the Company's activities, for which adherence will be mandatory. These will comply with or exceed regulatory controls or codes of practice where they are available. The company will continue to develop and improve its operational standards as a result of its own efforts and by using appropriate worldwide technological developments.

Operational Policy

1. Assess in advance the environmental impact of any significant new development.
2. Operate and maintain vehicles in a reasonable manner providing the maximum practicable environmental projection.
3. Utilise work practice, which minimise environmental damage.
4. Manage waste disposal only through environmentally conscious source of supplies.
5. Purchase, where possible from environmentally conscious suppliers.
6. Actively seek to improve the working environment.

Communication Policy

1. Make all employees aware of the Environmental policy, whilst providing suitable training to improve environmental awareness, and allocate clear responsibilities.
2. Take the interests of the local community into account, with due regard for public perception and have a process of communication with the community where appropriate.

The Managing Director at the Annual Management Review Meeting shall review the Environmental Policy.

The Safety Director He shall seek the cooperation and advice of outside organisations with the view to providing Health & Safety Training of company employees at all levels. In addition he shall be required to:

1. Prepare and keep an up to date Statement of the Company's Policy for Health and Safety and ensures that it is brought to the notice of all employees to Review the Policy on an annual basis and amend as necessary.
2. Ensure compliance to the Company Safety Management System 18001 and provide support to the SMS Manager.
3. Confer with and advise company employees on all aspects of Health & Safety and arrange for implementation of any Policy decisions.
4. Make arrangements for a Competent Health & Safety Professional to carryout externally Safety Audits or Site Inspections and maintain records and if applicable issue a copy of any report to the Client, Principal Contractor or Contractor for the close out of any contraventions noted on the Safety Audit / Safety Inspection.
5. **Conduct an annual audit of the company premises and check for compliance with the Health & Safety at Work Act 1974, Workplace Regulations 1992, Regulatory Fire Reform Order 2005 , Management of Health & Safety at Work Regulations 1999 and all associated / relevant regulations. Record shall be by use of Office H&S Plan and Fire Risk Assessment Documents**
6. Collate information with respect to safety matters. These shall include all Accident Reports, any RIDDOR notifications, Improvement/Prohibition Notices served, Audit Reports and Training requirements of personnel.
7. Keep and maintain records of training for all operatives under his control.
8. Maintain records of any plant and/or machinery under his control and arrange for servicing and testing by Insurance Surveyors at the periods dictated by regulations.
9. Be responsible for Accident Reporting by use of the Company Personnel Accident Report Form. Ensure all Accident/Incidents and significant near misses are thoroughly investigated.
10. Ensure the distribution of safety literature throughout the Company.
11. Ensure that adequate Welfare and First Aid facilities are available at the construction sites in accordance with the Construction Design & Management Regulations 2007.
12. Ensure that all information received relating to safety is made known and understood by all Company employees under his control.

13. Prepare instructions for the organisation and methods for carrying out the Company Policy, to make sure each person is aware of their responsibilities and the means by, which they can carry them out.
14. Know the appropriate statutory requirements affecting the Company's operations.
15. Ensure that appropriate training is given to all staff as necessary in accordance with the Company safety arrangements.
16. Insist that sound working practices are observed as laid down by Codes of Practice and that work is planned and carried out in accordance with the statutory provisions.
17. Adequate financial provision is made so that the Company can conduct its operation safely and effectively.
18. Ensure that there is liaison on health and safety matters between the Company and others working on the site.
19. Set a personal example when visiting sites by wearing the appropriate protective clothing.
20. Review working methods in relation to Health & Safety. Instigate Company discipline procedures as necessary.
21. Instruct all employees and affected third parties on action to be taken in the event of a fire at the construction sites under his control in accordance with the Health and Safety at Work Act 1974, CDM Regulations 2007"Joint Code of Practice for Fire Prevention on Construction Sites" - 6th Edition and the Regulatory Fire Reform Order 2005.
22. Provision of adequate lighting and safe method of electrical distribution.
23. Plan all Company works to eliminate hazards. Prepare project method statement(s) referencing risk assessment, if required following format required by clients.
24. Ensure Company plant equipment, first aid boxes and personal protective equipment are inspected at regular intervals.
25. Review the safety aspects of contract work during every site visit. Where necessary advise employees of failure to follow Company safety arrangements.

Contracts Manager / Safety Co-ordinator: Shall liaise with the Company Safety Director and all Site Safety Preventatives under his control with respect to all matters appertaining to health and safety.

He shall carry out an annual training review meeting to be convened with all Site Safety Representatives. An agenda shall be issued prior to this meeting. The meeting shall be formally minuted and the minutes shall note actions arising, responsibility allocated and provision for review. Pertinent matters arising shall be forwarded to Head Office for inclusion on the agenda of the Annual Management Review Meeting.

In addition he shall maintain all Staff Skills and Training Records for each employee on the appropriate form.

He shall be responsible for determining at enquiry of planning stage how a contract shall be organised as a safe place of work. All costs relating to safety shall be considered at the tendering stage. In addition he shall be required to:

1. Liaise on safety matters with any Co-ordinator / Principal Contractor appointed by a Client under the CDM Regulations 2007.
2. Ensure compliance to the Company Safety Management System 18001 and report any non conformances to the SMS Manager.
3. Ensure that all staff, operatives and sub contractors allocated to work on a contract are conversant with their responsibilities as required under the current Health and Safety at Work Act all associated/relevant regulations.
4. Ensure all new staff and labour only sub-contractors employed by the company receive the following:
 - a) Induction training pertinent to their responsibilities.
 - b) Information on the process to obtain a valid CSCS skills card, if not already held.
 - c) Formal Health & Safety Training.
 - d) A copy of the current Company Occupational Health, Safety and Environmental Policy and Safety Regulations together with any particular Safety Instruction Sheets. Signatures shall be obtained and records kept by use of the Induction Safety Training Form.
5. Keep and maintain records of training for all operatives under his control and he shall liaise with the Managing Director / Safety Director for provision of appropriate training following the approval.

6. Maintain records of any plant and/or machinery under his control and arrange for servicing and testing by Insurance Surveyors at the periods dictated by regulations.
7. Be responsible for accident reporting and notify the Site Safety Manager of all accidents by use of the Personnel Accident Report Form. Fatalities, RIDDOR Reports and any Improvement/Prohibition Notices shall be notified to the Company with all supporting correspondence at the earliest possible time following such an incident to enable full investigation.
8. Ensure that adequate welfare and First Aid Facilities are available at both the offices and sites under his control in accordance with the Construction Design & Management Regulations 2007.
9. Ensure that all information received relating to safety is made known and understood by all Company employees under his control. The appropriate Forms can be used for this purpose.
10. In liaison with the Site Safety representative, prepare and issue to all interested parties Risk Assessments and Method Statement/Safe Systems of Work (Site Operatives must be included) FOR EVERY CONTRACT. The relevant sheets of the particular Health & Safety Plan shall be issued for his purpose and are mandatory for work to be carried out under the CDM Regulations 2007.
11. Ensure that staff visiting site monitor the safety arrangements by use of the Site Safety Representatives Audit Report Sheet.
12. Instruct all employees and affected third parties on action to be taken in the event of a fire at the construction sites under his control in accordance with the Health and Safety at Work Act 1974, CDM Regulations 2007"Joint Code of Practice for Fire Prevention on Construction Sites" - 6th Edition and the Regulatory Fire Reform Order 2005. Copies shall be submitted to the Managing Director and Safety Director responsible, for their consideration of action.
13. Ensure that any flammable liquid or gases stored on a site and in particular LPG, are held in a safe manner as prescribed under HSE Guidance Note CS4.

Site Supervisor (Site Safety Representative) shall be required to:

1. Ensure that he had knowledge of the current Health and Safety at Work Act, Construction Design & Management Regulations 2007, Working at Height Regulations 2005 and HSG Notes with relation to the roofing industry.
2. Ensure all Specialist Sub Contractors Method Statements are received and approved prior to any work starting. This must then be incorporated into Health & Safety Plan.
3. Ensure that all Chargehands/Labour Masters/Sub Contractors receive and sign to signify understanding, copies of the Company Occupational Health, Safety & Environment Policy, Company Safety Regulations, Risk Assessments, COSHH Assessments integrated Method Statements/Safe Systems of Work PRIOR to commencement of work on site. The Health & Safety Plan for the particular site shall be used for this purpose. He shall further conduct a Site Induction for all Site Operatives prior to start of work to conform safety arrangements for the site using the relevant section of the Health & Safety Plan dually signed.
4. Conduct and record regular Tool Box Talk for all site operatives.
5. In conjunction with the Contracts Manager ensure that all new entrants to the roofing industry receive induction training pertinent to their trade and register any such training on the Induction Safety Training Form. In addition, he shall maintain a Site Labour Skills and Training Record for each employee as appropriate.
6. Diligently enforce Statutory and Company Regulations. Enforce the safety requirements of a site at all times and monitor these requirements by use of Site Safety Representative Audit Report Sheet as directed by the Contracts Manager.
7. Report and record ALL ACCIDENTS by use of the Personal Accident Report Form, copies of which shall be made available to senior management in accordance with relevant safety instruction for investigation and subsequent analysis.
8. Ensure that all plant, tools and equipment are on site are in sound working order, suitable and fit for purpose.
9. Ensure that operatives using plant, tools and equipment are competent and have received training in the use of any such item. Record all training on a Record Sheet.
10. Prevent risk taking and 'horse play' by site operatives.

11. Prevent risk to people, building and equipment on premises on or adjacent to where work is taking place.
12. Ensure the provision and use by site operatives of any necessary personal protective clothing or equipment as required by the particular Health & Safety Plan, Method Statement and Risk Assessments.
13. Ensure that sites are kept clean, tidy and clear of waste or debris.
14. Ensure that emergency procedures for every individual site are made known and understood by all site operatives. The appropriate Safety Management System documents can be used for this purpose.

Operatives (directly employed and labour only sub contractors)

All Operatives have a statutory duty to co-operate with their employees in all matters relating to Health & Safety at Work. Their personal responsibilities under the Health & Safety at Work Act Section 7 are, at all times to:-

1. Carry out reasonable instruction given by Company Management.
2. Strictly observe all safety equipments are detailed in the appropriate Health & Safety Plan and fully adhere to their specific method statements/risk assessments together with any further amendments as may be issued by management. Any changes to a safe method of work shall only proceed following approval by a Site Safety Representative.
3. Maintain all tools, plant and equipment including safety aids and protective clothing supplied by the Company in good working order.
4. Not interfere with or misuse anything, which is provided for theirs or others safety.
5. Isolate any defective items as noted in 'c' and prevent use of same by any other operative, following which notification shall be made to local management at the earliest possible time.
6. Use correctly all personal protective clothing and equipment provided by the Company.
7. Work in a safety conscious manner and behave similarly towards all other persons on site.
8. Warn other operatives on site of any known hazards, place warning notices where possible and report it to management as soon as possible.
9. Read thoroughly and observe all manufactures instructions on handling and application as shown on labelled materials, plant, tools and equipment delivered to site.
10. Establish the position of the nearest telephone to their place of work to minimise delays in the event of fire or accident. Also familiarise themselves with any evacuation procedures with respect to individual client's premises.
11. Only operate plant and equipment if they are trained in the use of it.
12. Maintain sites and welfare facilities in a clean and tidy manor.
13. Report ALL accidents, whether to person, premises or equipment to the local Site Safety Representative at the earliest possible time after the event.

Administrative Staff (Office or Site Based)

All employees have a statutory duty to co-operate with their employers in all matters relating to Health & Safety at Work. Their personal responsibilities under the Health & Safety at Work Act Section 7 are, at all times to:-

1. Carry out reasonable instructions given by the Company Management.
2. Work in a safe manner at all times.
3. Only operate equipment they have been trained or authorised to use.
4. Do not interfere with or misuse anything, which is provided for their or others safety.
5. Refrain from including in 'horseplay' and from abusing any welfare facilities provided.
6. Strictly observe all safety equipments are detailed in a particular Office Risk Assessment.
7. Read thoroughly and observe all manufactures 'instructions on handling' and 'application' as shown on labelled materials and office equipment.
8. Make full use of safety aids, appliances, equipment and protective clothing provided.
9. Report any accident, unsafe or hazardous conditions and if possible suggest ways of improving Office Safety via your Safety Representative.
10. Be familiar with the office or site Fire and Emergency Evacuation Plan.

ALL EMPLOYEES SHOULD NOTE: that wilful and flagrant breaches of the Company Occupational Health, Safety & Environmental Policy and Safety Regulations (see separate booklet) shall warrant disciplinary action by management and could lead to personal dismissal. Also, any such breaches could lead to personal prosecution by the Health and Safety Executive and may result in individuals facing substantial fines.

Incident and ill health reporting

Reporting and Investigation of Injuries, Accidents, Diseases and Dangerous Occurrences (RIDDOR)

1. In the event of a fatal or major injury to any person or dangerous occurrence as defined by the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995. The Safety Director or his nominee will immediately notify the local Health & Safety Executive by telephone, then complete and send Form F2508 to the Health and Safety Executive.
2. Accident Book B.I. 510 will be available on each site and workplace to ensure any injured employee can record details of his accident.
3. If a medical certificate or other written diagnosis from a doctor has been received in respect of an employee who is absent from work and the disease diagnosed is one of those listed in the Reporting of Injuries, Diseases and dangerous Occurrences Regulation 1995, the disease is reportable. Sterling Building Systems Ltd will complete and send Form F2508 to the Health and Safety Executive.
4. A full report of any incident investigated by the company will be held at the Company Registered Office, together with any photographs, statements or other relevant materials for use by Company insurers or legal advisers. This investigation report is privileged information and must not be issued to any other person without the permission of the Company insurers or legal advisers.
 - a. All accidents shall be notified to the Safety Director at the earliest possible time following any such occurrence.
 - b. All injuries shall be entered into Accident Book B1510 together with completion of Sterling Building Systems Accident Report Form part 1. Incidents triggering action under RIDDOR Regulations 1995 shall additionally require completion of form F2508 and Sterling Building Systems Accident Report Form part 2. It shall be the responsibility of the Site Safety Representative to conduct a preliminary investigation.
 - c. Any incident involving a fatality or major injury shall require IMMEDIATE notification to:
 - i. Managing Director / Safety Director
 - ii. Contracts Manager / Safety Co-ordinator
 - iii. Local HSE office FOR FATALITIES ONLY

Investigation will be carried out by the Company Safety Director and must seal off the area, leaving undisturbed any items of Tackle/equipment until the investigation is completed.

Training

It is the intention of the Company to ensure that all personnel carrying out inspection, repair and test functions or requiring special skills, who could affect product quality, shall be identified by reference to experience, qualifications and competence on personal training records.

In addition, all training requirements will be identified so as to ensure that all Management, Administrative and Site Based personnel, are adequately trained within their particular fields to carry out their primary duties.

Health and Safety Training of Employees

Under the Health and Safety at Work Act 1974 and the Management of Health and Safety at Work Regulations 1999, Sterling Building Systems Limited as employers ensure that all employees carry out work activities safely and without risks to health. We therefore also ensure that appropriate training is given to all employees in the following circumstances:

- a) Upon recruitment. (i.e. health & safety induction training)
- b) When they change their job or their responsibilities within the organisation.
- c) When new equipment or technology is introduced or when existing equipment is significantly modified.
- d) When any system of work changes.

All training and additional training requirements are to be identified at the annual training review meeting.

Welfare (Site and Office based)

Compliance with the Construction Design & Management Regulations 2007 and Workplace (Health, Safety and Welfare) Regulations 1992, the Company will make provision for washing and rest facilities, sanitary conveniences, accommodation for clothing, facilities for changing clothing and safe access to all the facilities provided.

- a) The provision of sufficient working space.
- b) Suitable traffic routes.
- c) Fire detection and fire fighting.
- d) The provision of fresh or purified air.
- e) Reasonable temperature and weather protection.
- f) Adequate and suitable lighting.
- g) Clean and orderly conditions.
- h) Workplace and equipment maintenance.
- i) Ventilation.

Display Screen Equipment Use - Site & Office

The Company are aware of the requirements of the Display Screen Equipment Regulations 1992. The Company has several V.D.U. workstations. These have been assessed with regards to ergonomic suitability.

The display screen operators have been offered free eyesight tests. In addition they have received safety awareness training concerning the display screen equipment recommendations and good practice for operators.

Work Equipment

Compliance with the Provision and Use of Work Equipment Regulations 1998, the Company will endeavour to ensure that all work equipment, which includes: machinery, appliances, apparatus, tools, component assemblies and, in some cases, complete plant. They must:

- a) Be suitable for its intended task and area of operation.
- b) Be well-maintained.
- c) Conform to certain EC requirements.

Where the work equipment poses a specific risk, only designated, trained persons may use or maintain it. Employees must receive adequate health and safety information, training and written instructions on how to use the equipment safely, etc. They must also understand the risks and necessary control measures associated with their work. Specific requirements address control systems, protection against specified hazards, temperature extremes, dangerous machinery parts, and isolation from energy sources, stability, lighting and warning signs.

C.O.S.H.H

Compliance with the Control of Substances Hazardous to Health 2002, the Company will:

- a) Assess the risks posed by exposure to hazardous substances in the workplace.
- b) Prevent, or at least adequately control, those risks.
- c) Provide, maintain, test and examine suitable control measures and ensure that they are used.
- d) Monitor workplace exposure against the prescribed exposure limits, where appropriate.
- e) Provide health surveillance, where appropriate.
- f) Provide relevant information, instruction and training to employees.

Employees must make full and proper use of any control measures provided. The Company is fully committed to observance of these regulations and subscribes to an outside consultancy to research and prepare required assessments.

Identification of requirements and issue to affected personnel is via the Health and Safety Plan particular to a contract.

Noise

Compliance to the Noise at Work Regulation 2005 is achieved by observance of the Company's Policy of the Assessment and Control of Noise at Work document by all personnel. The requirements for site controls are addressed through consultation with the Safety Director or his nominee with any finding being recorded in the particular site Health and Safety Plan and associated Method Statements/Risk Assessments.

Employees must make full and proper use of anything provided by the employer in relation to these Regulations.

Manual Handling

Compliance to the Manual Handling Regulations 1992 is achieved by training initial risk assessment and completion of a specific manual handling risk assessment. Where possible, manual-handling activities must be avoided so far as is reasonably practicable. If it is not possible to avoid the activity, it must be assessed and the risk of injury reduced to the lowest level reasonably practicable. The assessment should consider:

- a) The load to be manually handled.
- b) The task, i.e. bending, twisting, etc.
- c) The environment where the activity is being carried out.
- d) The physical suitability of the individual to carry out the operation.

Employers must also provide employees with information on the weight of the load and the centre of gravity of asymmetrical loads, where appropriate. Employees must make full and proper use of any work equipment or system introduced by the employer in.

Personal Protective Equipment (PPE)

Compliance to the Personal Protective Equipment Regulations 1992, the appropriate PPE shall be made available by the Company and issued to operatives as required by law/or as deemed necessary by the Company Management. Operatives shall be required to use any such equipment and clothing in accordance with any instruction or training received, monitor its condition and report any defects for repair or replacement. All grades of management shall set a good example by wearing the appropriate PPE when visiting sites.

Working at Height

Compliance with the Working at Height Regulations 2005 & Construction Design & Management Regulations 2007. It shall be the responsibility of the Contracts Manager (or his nominee) to assess all risks associated with working at height, ensuring that considerations for the prevention of falls from height (including through fragile surfaces) are fully addressed, following the hierarchy of control stated within the Working at height Regulations 2005, Construction Design & Management Regulations 2007 and the HSG 33 Safety in Roof Work and any ACR Documents which may be appropriate to the works. Recognise that the reliance on safety harnesses/fall arrest, is the last consideration in the hierarchy and can only be adopted where all other options have been investigated and rejected as not practicable. He shall seek additional advice from the Safety Director if required.

It is the Company's Policy to install Safety Nets on its entire roofing works. Safety Netting Surveys MUST be adopted if there is any doubt that this may not be achieved.

Any Method Statement / Safety System of Work for any roof works where Safety Nets are not installed MUST be approved by the Safety Director before any roof works commence.

Asbestos Contaminated Materials (not normally requiring a licence)

Sterling Building Systems will not be involved with any works involving or containing Asbestos Contaminated Materials.

Abrasive Wheels.

The company uses angle grinders with cutting off wheels; all operatives will be competent in their use and made aware of the specific safety requirements when using them.

- a) Selection of Blade/Abrasive Wheel.
- b) Check of tool and blade speed to prevent over speeding.
- c) Use of guarding and eye protection.
- d) Possible necessary use of ear and respiratory protection dependant on duration of use and material being cut.
- e) Fire from spark producing operations, i.e. use of cutting wheels on metallic material. Precautions are good housekeeping, provision of fire extinguisher and fire blanket; check of work areas on completion of works. Provision and use of Work Equipment Regulations 1998 and H.S.G. Guidance PM 22 applied.

HAV's

All Company operatives who have any of the above named items of tools/tackle or are likely to be subject to HAV's (Hand Arm Vibration) are therefore required to under go health surveillance medical mutually agreed between Operatives and Management with the findings being recorded. See Safety Instruction for full guidance of the company procedure.

Quality

A right first time approach is adopted by all employees i.e. the person who is directly undertaking the activity, task or process is most able to influence the quality of the outcome. Sterling Building Services is responsibility is to ensure those activities; tasks and processes achieve the specified targets. Sterling Building Systems employees will:

- a) be made aware of the standard of work required before they start work.
- b) ensure the method of work will achieve the required standard.
- c) if there is any protection needed, make sure it is fitted prior to leaving the work area.
- d) be available to carryout a test and inspection plan on handover of particular areas of works completed.

No Smoking Policy

This policy has been developed to protect all employees, customers and visitors from exposure to second hand smoke and to assist compliance with the Health Act 2006.

Exposure to second hand smoke increases the risk of lung cancer, heart disease and other serious illnesses. Ventilation or separating smokers and non-smokers within the same airspace does not completely stop potentially dangerous exposure.

It is the policy of Sterling Building Systems Ltd that all our workplaces are Smoke Free, and all employees have a right to work in a smoke free environment. The policy shall come into effect on the 01 July 2007, (02 April 2007 in Wales). Smoking is prohibited in all enclosed and substantially enclosed premises in the workplace.

Company vehicles are classed as a workplace and vehicles, which are used for work by more than one person, regardless of whether they are in the vehicle at the same time, are subject to this policy.

This policy applies to all employees, consultants, contractors and visitors.

Overall responsibility for policy implementation and review rests with the Safety Management Systems manager, however, all staff are obliged to adhere to and support the implementation of this policy.

Guidance for implementation can be found in the Safety Management System (SMS) and Safety Instruction SI 11.07. The SMS manager shall inform all existing employees, consultants and contractors of the policy and their role in the implementation and monitoring of the policy.

This policy is to be brought to the attention of all employees, consultants, contractors and visitor by the induction process. For existing personnel the policy is to be effectively communicated via team talks and/or toolbox talks.

Disciplinary procedures will be followed if a member of staff does not comply with this policy. Those who do not comply with the Smoke Free law may also be liable to a fixed penalty fine and possible criminal prosecution.

The NHS offers a range of free services to help smokers give up. Visit gosmokefree.co.uk or call the NHS Smoking Helpline on 0800 169 0 169 for details. Alternatively you can text 'GIVE UP' and your full postcode to 88088 to find your local NHS Stop Smoking Service

Drugs and Alcohol Policy

This document sets out the Company's policy in respect of any employee, or contractor's representative, whose proper performance whilst at work, is impaired as a result of the taking of drugs or the consumption of alcohol. In addition, the policy deals with the possession, storage and/or dealing of illicit drugs whilst on company premises.

This document will be amended from time to time. It reflects the Company policy towards the use of drugs and the effects of alcohol whilst at work.

The company aims to provide a safe and efficient service for its customers and a safe and secure environment for employees, contractors and others who may be affected. With this in mind, the provisions of the policy are as follows:

To make employees and any sub contractors aware that to use, possess, consume or store or sell 'illicit' drugs (e.g. heroin, cocaine, cannabis etc.) on company premises or to report for works having taken such drugs is likely to result in disciplinary action in accordance with the Company Disciplinary Procedure.

To make employees and sub contractors aware that to consume alcohol on Company premises or to report for work under the 'influence' of alcohol, is likely to result in disciplinary action in accordance with the Company Disciplinary Procedure.

To make employees and sub contractors aware the taking of 'medical' drugs may well impair that work performance and safety.

To minimise problems at work arising from drug/alcohol use or abuse by identifying employees or sub contractors whose performance is impaired by drugs/alcohol and to resolve any problems that may arise.

To encourage anyone with a drug/alcohol problem to come forward and seek help. It is the company's policy to ensure that any employee who informs the company of any such

problem is treated sensitively and in confidence, within the constraints of any legal requirements.

The company **will carry out testing** for evidence of named drugs and /or alcohol levels:

- a) Following any incident.
- b) Should any employee give cause to believe they may be acting under the influence of drugs or alcohol.
- c) At any time and without advance warning.

Safety Representatives and Safety Committees

Compliance to the Safety Representative and Safety Committee Regulations 1977 and Health & Safety (consultation with employees) Regulations 1996. The nominated persons will:

- a) Consult with the employer in matters of health and safety.
- b) Carry out prescribed inspections of the workplace as required.
- c) Attend the company and any site health and safety committee meetings on behalf of the employees.
- d) Cascade the relevant information resulting from any Safety Committee Meetings to the employees at the earliest opportunity.

These regulations must be observed; record and minutes of all such meetings must be generated and communicated to all employees.

The Managing Director will issue a formal letter of appointment to all Company Safety Representatives.

IN CONCLUSION: The attention of all members of the Company is drawn to the fact that each and every one is expected and required by law to co-operate in observing the Occupational Health, Safety and Environmental Policy laid down by the Company, both in the letter and the spirit.

Sterling Building Systems Ltd

Occupational Health, Safety and Environmental Policy and Safety Regulations

I acknowledge receipt of the Occupational Health, Safety and Environmental Policy together with Safety Regulations Reprinted July 2007 published by Sterling Building Systems Ltd. I confirm that I have read these documents and that I shall comply in all respects:

Signed: _____

Print Name: _____

Company Name & Address: _____

Date: _____



Honesty & Commitment Assured

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