

## HEALTH AND SAFETY POLICY

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## 1.0 Foreword

Group Metropolitan Ltd recognises and accepts the responsibilities within its undertaking to provide a safe environment for all its employees, contractors, visitors and members of the public. Every aspect of Group Metropolitan Ltd shall have a responsible and thorough approach to safety, with safety being integrated into all aspects of its work.

Group Metropolitan Ltd, through its management team, strives to provide a safe and pleasant environment for employees, visitors, contractors and customers. Throughout all projects the aim is to improve and develop Group Metropolitan Ltd's safety performance and continuous improvement will remain a priority. Group Metropolitan Ltd will work and co-operate with all interested parties to develop and maintain a positive safety culture.

We encourage all to safeguard themselves and others safety by evaluating the risks encountered and to adopt sensible precautions to remove or minimise risk to as low as reasonably practicable. Regarding Group Metropolitan Ltd employees, as your employer, Group Metropolitan Ltd shall carry out assessments of the risks that you may face and put in suitably effective controls measures. I encourage you to inform your manager of any safety concerns that you may have.

The Senior Management Team of Metropolitan Ltd is responsible, within the terms of the appropriate legislation, for the safety of its employees, visitors and customers. It accepts that the avoidance of accidents involving injury and the consequential human suffering is a common interest to all. Great importance is attached to safety with the commitment to play an influential role in providing a safe working environment.

**Graham Halls (Signed)**  
**Managing Director**

Date Reviewed: 12<sup>th</sup> February 2026  
Next Review Date: 12<sup>th</sup> February 2027

## 2.0 The Philosophy of The Senior Management Team

Safety should be an integrated function of management, and each manager/employee should be accountable for the safety performance of his/her department/work area. The active co-operation and understanding of all employees and/or sub-contractors are a vital aspect of the organisation's safety element. The Senior Management Team believes that all accidents are preventable and that their occurrence demands investigation and timely action. The Senior Management Team seeks to comply with the spirit as well as the letter of current safety legislation, approved codes of practice and authoritative guidance literature.

Group Metropolitan Ltd Directors will also actively ensure that it discharges its duties with regard to health and safety management by:

- Accepting formally and publicly their collective role in providing safety leadership within the organisation.
- Each member of The Senior Management Team accepts their individual role in providing safety leadership for their organisation.
- All decisions will reflect its safety intentions, as articulated in the safety policy statement of intent.
- The Senior Management Team recognises its role in engaging in the active participation of employees in improving safety.
- The Senior Management Team will ensure that it is kept informed of, alert to, relevant safety risk management issues.
- The Senior Management Team agree that safety is a key area of management demanding the control and application of modern management techniques.

## 3.0 General Statements of Intent

### 3.1 Health and Safety

Group Metropolitan Ltd recognises that high standards of health, safety and welfare are an integral element of a successful and efficient business. The management of this key performance indicator is therefore central to our strategy for the wellbeing of the Company.

We acknowledge that Health, Safety and Welfare is a management responsibility of equal importance to production (i.e. installation), quality and finance; to be actively pursued through the continuing development of employee competence and the provision of competent advice to achieve progressive improvements in Health, Safety and Welfare performance.

As a company we are committed to ensuring compliance with the requirements of The Health and Safety at Work Act 1974 and such other relevant Health and Safety legislation together with any new legislation that may be introduced. We will therefore ensure, so far as is reasonably practicable, that:

1. The health, safety and welfare of all employees is always ensured and never compromised, as is any other persons who may be affected by the Company's acts or omissions.
2. All relevant statutory requirements are observed and treated as the minimum standards to be applied to any work activities.
3. Health, safety, and welfare considerations are included in our business planning and decision making thus far ensuring a safe and healthy working environment along with methods of work and conditions are provided, adopted, and managed.
4. Adequate information, instruction, training, and supervision are provided so that through the use of formal risk assessments and the communication of the control measures to be adopted to eliminate or reduce risk, individuals are made aware of the potential hazards they face as a consequence of their work.

5. Plant, equipment, and materials provided for work that is to be undertaken are fit for purpose and adequately maintained to be free from unnecessary risk.
6. Employees and Sub-Contractors are actively encouraged to participate in Health and safety, raise safety concerns and submit ideas and suggestions for improving standards, thereby facilitating co-operation between individuals and groups.
7. The immediate and underlying causes of work-related injuries and near misses are identified, and the necessary preventative actions are implemented to prevent a re-occurrence. This will include, as a last option, the provision and use of the correct personal protective equipment to ensure employees' health and safety.
8. All necessary precautionary and preventative measures are implemented to prevent the spread of infectious diseases in the workplace.
9. To assist in the promotion of a positive Health, Safety and Welfare culture the Company will establish objectives, develop, implement, and maintain management controls; institute sound communication of information on safety and health; monitor, audit and review matters of Health, Safety and Welfare. In pursuance to that Health, Safety, and Welfare will therefore be regularly reviewed at a senior level. This Policy will be reviewed and developed periodically to ensure it remains effective and any necessary amendments will be communicated to all employees.

### 3.2 Environmental

Group Metropolitan Ltd recognises the importance of protecting the environment, the prevention of pollution, and the efficient and effective use of sustainable raw material, and as such is committed to operating its business responsibly and in compliance with all current environmental legislation and approved codes of practice.

We will continually assess the environmental impact of our operations and set out annual objectives and targets designed to ensure continual improvement in our environmental performance. In particular, we aim to carry out all measures that are considered reasonable and practicable to meet or exceed pre-determined environmental performance levels through the implementation and/or support of the following commitments and practices:

Group Metropolitan Ltd is committed to reducing the risks our employees face and create when driving for work. We expect that all employees play their part, whether they use a company vehicle, their own or a hire vehicle.

- To develop a full understanding and to effectively mitigate to as low as reasonably practical levels, the effects environmental impacts relating to our activities may have on the environment and the local community.
- To achieve compliance with relevant environmental legislation and all other supporting regulations, including industry-specific standards and codes of practice where they may apply.
- To prevent pollution of any kind, while at the same time promoting the conservation of our natural environment, cultural heritage and the reduction, recycling, and reuse of waste products wherever it has been considered reasonably practicable.
- To design, develop and implement a business-specific environmental management system to enable the safe and effective mitigation of our environmental impact, and to meet the requirements of best practice.
- To identify and apportion key responsibilities to key competent staff members in support of our environmental management systems and its effective operation.
- To develop, monitor and measure environmental objectives and targets in support of the continual improvement of our environmental performance.
- To continue to raise the environmental awareness of our clients, our staff, our contractors, and our supply chain to ensure effective management of our environmental impacts.

- To work in partnership with our clients, our supply chain, and our contractors in promoting wherever reasonably practicable, the adoption of best practice environmental management techniques in the delivery of our services.
- To work with communities in areas in which we operate to ensure, wherever reasonably possible practicable, the improvement in quality of life is achieved.

This policy is communicated and displayed throughout our organisation, so that the employees of Group Metropolitan Ltd, its suppliers, sub-contractors and members of the public are made aware of its content and the commitment made.

### 3.3 Quality

It is the policy of Group Metropolitan Ltd to provide and manage its resources, such that the service it provides to its clients is of the highest possible quality, and it is supplied within agreed timescale, taking into account client specified requirements.

Group Metropolitan Ltd recognises the quality of its product and services are paramount, and that its reputation and continued growth depend upon the positive commitment and culture of its management, staff, and supply chain to ensure that specific requirements and standards of performance are specified, monitored, and consistently achieved.

In support of achieving these aims, Group Metropolitan Ltd have designed, developed, and implemented this Quality Manual, which is further supported by a structured Management System that conforms to industry best practice, while at the same time continuously supports Group Metropolitan Ltd in improving whilst supporting compliance with all appropriate legislative demand and other industry-specific standards, based on the services it currently provides and the sectors in which it operates.

While ultimate responsibility for the use and application of the Group Metropolitan Ltd Management System rests ultimately with its Company Directors, devolved responsibility has been confirmed and allocated to key, trained personnel throughout all levels of operation, such that the Company's aims and objectives may be achieved, and the appropriate culture within the organisation is encouraged and supported.

To further support the achievement of the Company's aims and objectives, Group Metropolitan Ltd have also devised, implemented, and continues to support a structured Performance Management System, whereby required performance is specified, allocated and monitored on a regular basis against pre-determined key performance indicators that have in turn pre-determined levels of performance confirmed.

It is because we believe through the effective support of the Group Metropolitan Ltd Performance Management System and its workforce that our aim of continued effectiveness, development, and improvement in the services we provide our clients may be achieved.

This policy is communicated and displayed throughout our organisation, so that the employees of Group Metropolitan Ltd, its suppliers, sub-contractors and members of the public are made aware of its content and the commitment made.

### 4.0 Organisation

Group Metropolitan Ltd define the responsibilities and relationships, which promote a positive safety culture, and secure implementation and continued development of the safety policy. Structures and processes are required to:

- Establish and maintain management control within an organisation; Promote co-operation between individuals and groups so that safety becomes a collaborative effort. Ensure the communication of necessary information throughout the organisation. Secure the competence of employees.

Group Metropolitan Ltd maintains control of its business by:

- Obtaining the commitment of its employees.
- Allocation of safety responsibilities to all employees.

- Sufficiently resourcing the organisation to manage safety.
- The setting of standards for performance.
- Monitoring performance, by inspections and audit.

Investigating incidents and implementing improvements to prevent reoccurrence.

Project organisational culture:

Project Organisational Culture	Descriptions
<ul style="list-style-type: none"> <li>• Project objectives clarification.</li> <li>• Obligation clarification by contractors.</li> <li>• Obligation clarification by clients.</li> <li>• Mutual understanding.</li> <li>• Commitment of project benefits.</li> </ul>	<ul style="list-style-type: none"> <li>• Objectives and values of the project are clearly understood by project participants.</li> <li>• The contractors clearly understand their required roles and duties.</li> <li>• The client clearly understands their required roles and duties.</li> <li>• All project participants concern each other's objectives, expectations, and values.</li> <li>• When disputes or conflicts occur, the participants first look at how the project would benefit rather than how they would benefit.</li> </ul>
<ul style="list-style-type: none"> <li>• Effective interactions at work.</li> <li>• Information exchange.</li> <li>• Roles of project manager.</li> <li>• Trust-sharing atmosphere.</li> <li>• Mutual respect and openness.</li> <li>• Idea exchange and support.</li> <li>• Assignment of blame and accountability.</li> </ul>	<ul style="list-style-type: none"> <li>• Effective working relationships among the participants are promoted in terms of exploring innovative solutions and reducing costs and time spent.</li> <li>• Information is shared, transparent, and available to participants over the course of the project.</li> <li>• Project managers assist, support, and clearly communicate with their subordinates, ensuring accomplishment of project objectives.</li> <li>• There is an atmosphere of mutual trust generated by project participants.</li> <li>• The project participants are open and respectful of one another.</li> <li>• The project participants are encouraged to exchange ideas and to help one another.</li> <li>• Assignment of blame and accountability issues is (not) emphasised when things go wrong over the course of a project.</li> </ul>
<ul style="list-style-type: none"> <li>• Value project participants' contributions.</li> <li>• Available opportunities.</li> <li>• Promote empowerment.</li> <li>• Recognise achievements.</li> <li>• Emphasise training works.</li> <li>• Encouragement of respectful attitudes toward workers.</li> <li>• Emphasise good conditions for workers.</li> </ul>	<ul style="list-style-type: none"> <li>• All project participants are valued as important contributors to the success of the project.</li> <li>• All project participants are encouraged to develop their capabilities over the course of the project.</li> <li>• Project participants are empowered to make decisions by themselves at any level.</li> <li>• Project participants take pride in or celebrate achievements when they achieve production milestones.</li> <li>• Workers are scheduled to attend any training sessions regarding skills and safety.</li> </ul>

	<ul style="list-style-type: none"> <li>• Workers are really being treated with respect over the course of project.</li> <li>• Workers are concerned about health and welfare.</li> </ul>
<ul style="list-style-type: none"> <li>• Contractor's assurance to project quality.</li> <li>• Contractor's assurance to project schedule.</li> <li>• Contractor's assurance to project budget.</li> <li>• Supervisor's obligation to work.</li> <li>• Client's obligation to agreements.</li> </ul>	<ul style="list-style-type: none"> <li>• The contractors emphasise committing to the project's success regarding quality.</li> <li>• The contractors emphasise committing to the project's success regarding the schedule.</li> <li>• The contractors emphasise committing to the project's success regarding contract costs.</li> <li>• The supervisor emphasises obligation to making the project successful.</li> <li>• The <i>client</i> emphasises obligation <i>to the contract agreements</i>.</li> </ul>
<ul style="list-style-type: none"> <li>• Emphasise leadership.</li> <li>• Encouragement in decision making.</li> <li>• Direction by project leaders.</li> <li>• Instruction by project leaders.</li> <li>• Participation in decision making.</li> </ul>	<ul style="list-style-type: none"> <li>• Project leaders are encouraged to show their strong leadership.</li> <li>• Decision making is liberally encouraged at every level.</li> <li>• Project leaders always ensure that their subordinates know what is expected of them.</li> <li>• Project leaders always ensure that individual accountability is clear.</li> <li>• All project members are encouraged to participate in the decision-making process over the course of the project.</li> </ul>

#### 4.1 Control

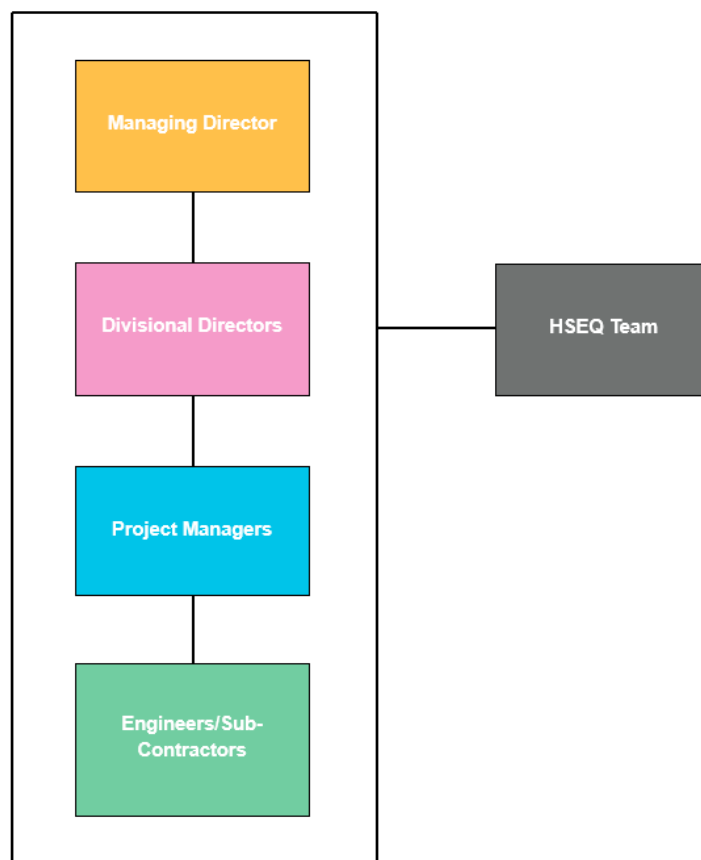
The Senior Management Team has the ultimate responsibility for the safety of its undertaking. At each management meeting safety is discussed as a separate agenda item.

Group Metropolitan Ltd operates a safety committee specifically to assist The Senior Management Team in discharging its responsibilities. It does this by monitoring and co-ordinating all safety issues affecting its undertaking and liaising with management organisation.

The safety committee composition will ensure that each part of the organisation is sufficiently represented.

The Managing Director has overall management responsibility and is ultimately accountable for the safety within Group Metropolitan Ltd. The Managing Director of Group Metropolitan Ltd has appointed a technical expert to manage the Health, Safety, Environmental and Quality compliance of the business.

The flow chart (figure 1) shows that the HSEQ team links into every level of the business and supports directors, managers and frontline team members.



#### 4.2 Communication

Group Metropolitan Ltd employees can, and are encouraged to, report any near misses, incidents or concerns they have on safety whilst in any Group Metropolitan Ltd premises or when on site and when out on company business to their Line Manager for appropriate action. Any resulting action from such reports will be fed back to the originator of the report.

Group Metropolitan Ltd employees will be notified when policies and procedures have been produced or updated, and where necessary they will be provided with any training that may be required.

**Further internal communication can take place in relation to safety matters in the form of:**

- Team briefings, site safety forums and toolbox talk sessions.
- Safety Bulletins.
- Dedicated and managed safety notice boards.

**Safety information can come into the organisation from several sources, including:**

- Health and Safety Executive (HSE)
- Health and Safety publications.
- Health and safety technical experts.
- Attending relevant conferences and seminars.

### 4.3 Competence

There is an ongoing requirement for safety-related training for Group Metropolitan Ltd employees to be undertaken.

The Line Manager responsible will ensure that an induction for all new Group Metropolitan Ltd employees is undertaken and subsequently recorded; this induction will include relevant health and safety information and arrangements.

The safety training plans for individuals will be developed via a training/skills matrix which is produced by Group Metropolitan Ltd in conjunction with the HSEQ Manager and the employee's line manager.

Operatives will upload copies of their relevant competencies as part of their site-based online induction on the Breadcrumb platform.

Planning is essential for the implementation of safety policies and procedures. All members of the organisation can only achieve adequate control of risks through coordinated action. An effective planning system for safety requires organisations to establish and operate a safety management system which controls risks by:

- Reacting to changing demands.
- Proactive measures based on performance analysis.
- Developing and sustaining a positive safety culture.

Group Metropolitan Ltd will compile a safety plan and/or objective on an annual basis, with the implementation being delegated to relevant individuals.

#### **Competency of Site Supervision:**

Group Metropolitan Ltd is committed to maintaining the highest standards of safety, competence, and operational excellence across all project sites. To support this commitment, all on-site supervisors must meet the minimum training and competency requirements outlined in this policy.

All individuals appointed to a supervisory role must hold the following qualifications as a minimum standard:

- Emergency First Aid at Work (or equivalent).
- SSSTS (Site Supervisors' Safety Training Scheme) or SMSTS (Site Management Safety Training Scheme) qualification.
- A valid and relevant skills card for their specific trade or discipline (e.g., CSCS, ECS, or equivalent).

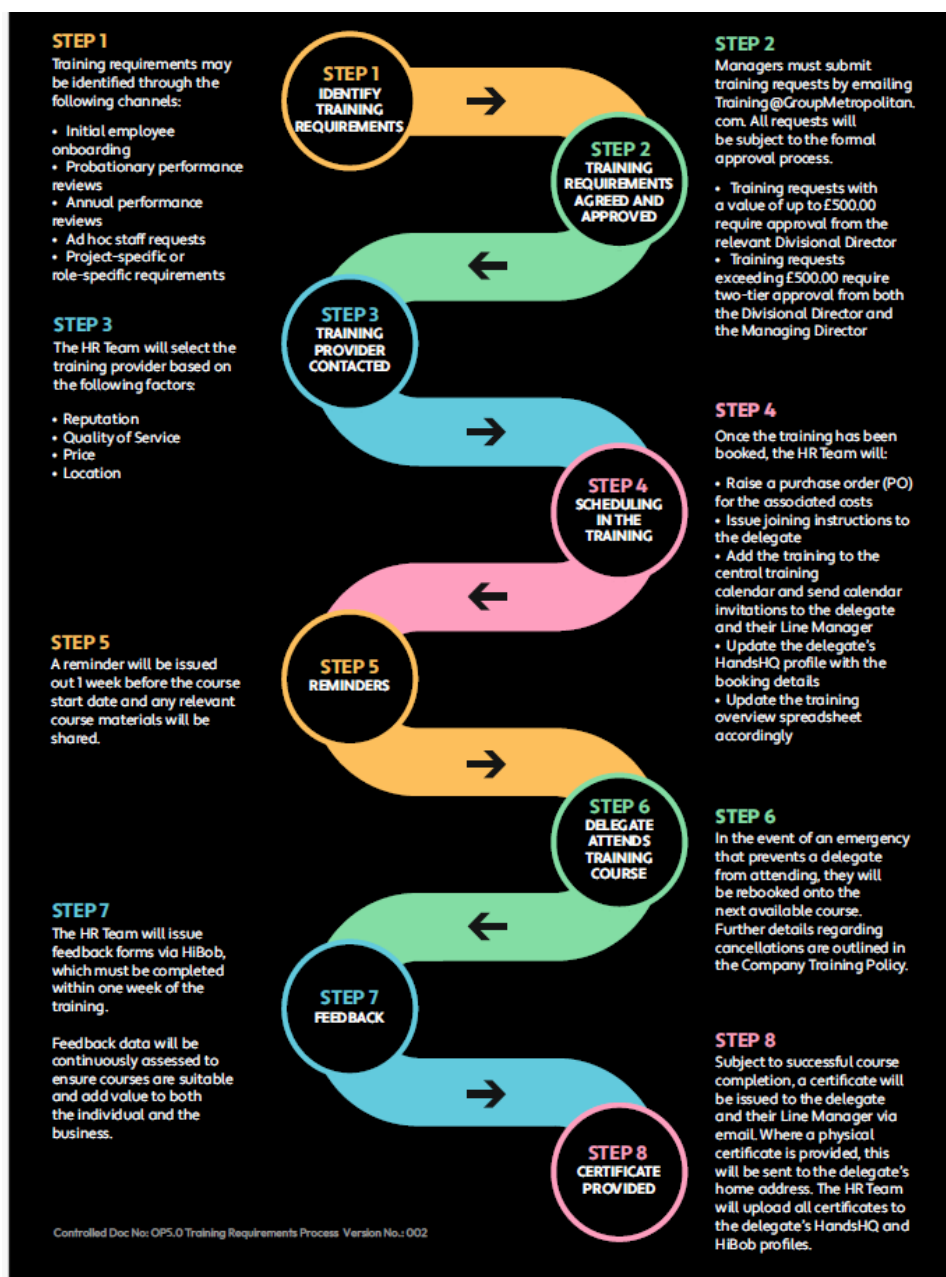
These requirements ensure that supervisors possess the necessary knowledge, skills, and authority to manage work activities safely, effectively, and in accordance with company procedures and industry regulations.

It is the responsibility of each supervisor to maintain their qualifications, ensure they remain in date, and provide evidence of certification when requested. No individual may undertake supervisory duties without meeting these minimum standards.

## 4.4 Training

Group Metropolitan Ltd monitors the competence of its employees regularly to highlight any training needs.

Below is the process for the identification of training needs and the subsequent implementation of this training.



## 5.0 Planning and Implementation

Group Metropolitan Ltd follow the Plan, Do, Check, Act process when it comes to planning and implementation of anything that is designed to change or improve any part of the health and safety management system.

Planning is done companywide during senior management meetings and the annual management review, as early as possible for each project specifically and as required.

As principal designer we shall plan, manage, monitor and coordinate health and safety during the pre-construction phase (design and planning stage) of a project involving, or likely to involve, more than one contractor.

As principal contractor we shall plan, manage, monitor and coordinate health and safety during the construction phase of a project involving, or likely to involve, more than one contractor.

As contractors we shall plan, manage and monitor all work carried out by themselves and their workers. The implementation of any plan shall be monitored and reviewed at agreed intervals.

## 6.0 Monitoring and Measuring

Measurement is essential to maintain and improve safety performance. There are two ways we generate information on performance.

- Active systems, which monitor the achievement of plans and the extent of compliance with policy and safety procedures.
- Reactive systems which monitors accidents, ill health, and incidents.
- Effective procedures are needed to capture both sorts of information.

Group Metropolitan Ltd monitors safety performance in several ways:

Proactive:

- Office and site safety inspections.
- Work equipment inspections.
- Means of escape inspections.
- Audit of policy compliance.

Reactive:

- Following up reports of dangerous occurrences.
- Accident and incident statistics.
- Incident/accident investigation.
- Near miss reporting.

Regular reports on employee matters including any safety issues are presented to Health and Safety Committee meeting and reviewed with actions being allocated if and when necessary to rectify any shortcomings identified.

Performance against safety responsibilities identified in the below appendices, these are reviewed on a regular basis (within performance review) between the jobholder and line manager and corrective action taken if necessary.

Performance objectives are updated annually and may include a safety related objective.

### 6.1 Audit and Review

Organisations can maintain and improve their ability to manage risks by learning from experience using audits and performance reviews. The audit provides a systematic and independent check of compliance with the system and can also provide a comparison with “best practice”.

Group Metropolitan Ltd will undertake an independent audit (at least annually) of its performance against its policy on a regular basis and instigate appropriate action against recommendations.

This policy will also be reviewed to take into consideration the findings of relevant audits, relevant changes in legislation, and relevant changes within the business organisation or any other circumstances that would suggest review is required.

## 6.2 Unplanned Audits

Group Metropolitan Ltd reserves the right to conduct unplanned audits at any time. These audits may be carried out by senior management, including members of the Health & Safety (H&S) team, to ensure compliance with all operational, safety, and security requirements.

All employees, contractors, and visitors are required to fully cooperate with unplanned audits and must adhere to all established access control procedures. This includes, but is not limited to, providing accurate information, granting appropriate access throughout the duration of projects, and following all identification and security protocols.

Failure to comply with access control procedures or attempts to obstruct, delay, or interfere with an unplanned audit may result in disciplinary action, in accordance with GML disciplinary procedures.

## 6.3 Cancellation of Pre-Planned Audits

Pre-planned audits form a critical component of the company's safety management system and must not be cancelled except under extreme and unavoidable circumstances. Any cancellation must be fully justified to the auditing departments' appropriate divisional director, formally documented, and rescheduled at the earliest opportunity to ensure continued compliance and effective oversight. Group Metropolitan Ltd regards any breach of this rule to be a disciplinary matter that may result in formal disciplinary action.

## 7.0 Roles and Responsibilities

### 7.1 Managing Director

- Provide positive leadership for Group Metropolitan Ltd on H&S issues.
- Promote an enthusiastic H&S culture that delivers positive commitment to, and engages all employees in, continuous improvement in H&S performance.
- Implement the H&S Policy. In particular:
  - Identify H&S training needs and have the necessary training arranged. When arranged, release those who require training.
  - Make arrangements for H&S induction training for all new starters at the workplace under their control.
  - Implement operating procedures, including risk assessment procedures, for the planning and control of activities associated with identified risks.
  - Appoint appropriate personnel to undertake H&S duties.
  - Ensure that suitable arrangements are in place for effective control of changes to planned methods of work.
- Monitor and review the effectiveness of the H&S Policy and report deficiencies.
- Monitor that personnel under their control comply with their individual responsibilities in H&S matters.
- Give personnel under their control, including contractors, clear instructions as to their responsibilities to ensure correct working methods.
- Make adequate provision for dealing with Health and Safety emergencies.

- Promptly alert line and H&S management to:
  - Significant injuries to employees or those working under our control.
  - Reportable dangerous occurrences.
  - Incidents that could lead to enforcement action.
  - Enforcement notices served.
  - Injury to a member of the public or a visitor.
  - Near miss incidents.
- Where appropriate, be involved in the investigation and ensure that the findings are reported.
- Act immediately on any breach of the policy or procedures, unsafe situation or potential threat to the environment that comes to their attention and, where necessary, report such breaches.
- Ensure that the disciplinary process to address breaches of the H&S Policy or management system is applied where necessary.

## 7.2 Divisional Directors

- Provide positive leadership on H&S issues within relevant areas of the business and/or projects.
- Promote an enthusiastic H&S culture that delivers positive commitment to and engages all employees in continuous improvement in H&S performance.
- Implement the H&S Policy. In particular:
  - Identify H&S training needs and have the necessary training arranged. When arranged, release those who require training.
  - Appoint appropriate employees to undertake H&S duties.
  - Make arrangements for H&S induction training for all new starters at the workplace under their control.
  - Ensure that suitable arrangements are in place for effective control of changes to planned methods of work.
  - Implement operating procedures, including risk assessment procedures, planning and control of activities associated with identified risks.
- Monitor and review the effectiveness of the H&S Policy and report deficiencies.
- Monitor that personnel under their control comply with their individual responsibilities in H&S matters.
- Give personnel under their control, including contractors, clear instructions as to their responsibilities to ensure correct working methods.
- Make adequate provision for dealing with H&S emergencies.
- Promptly alert line and H&S management to:
  - Significant injury to employees or those working under our control.
  - Enforcement notices served.
  - Injury to a member of the public or a visitor.
  - Reportable dangerous occurrences.

- Serious environmental incidents.
- Incidents that could lead to enforcement action.
- Where appropriate, be involved in the investigation and ensure that the findings are reported and recorded.
- Act immediately on any breach of the Policy and procedures, unsafe situation or potential threat to the environment that comes to their attention and, where necessary, report such breaches.
- Ensure that the disciplinary process to address breaches of the H&S Policy or management system is applied where necessary.

### 7.3 Managers

Planning is essential for the implementation of safety policies and procedures. All members of the organisation can only achieve adequate control of risks through coordinated action. An effective planning system for safety requires organisations to establish and operate a safety management system which controls risks by:

- Provide leadership on H&S issues within your area of operation.
- Promote an H&S culture that delivers positive commitment to and engages all employees in continuous improvement in H&S performance.
- Monitor that personnel under their control comply with their individual responsibilities in H&S matters.
- Give personnel under their control, including contractors, clear instructions as to their responsibilities to ensure correct working methods.
- Make adequate provision of H&S training needs and monitor delivery and recording.
- Review accident and incident reports, identify any trends and ensure that there is an appropriate response to prevent future occurrence.
- Promptly alert line management to significant accidents and incidents. Where appropriate, be involved in the investigation and ensure that findings are reported.
- Promptly alert line and H&S management to:
  - Significant injuries to employees or those working under our control.
  - Report on dangerous occurrences.
  - Incidents that could lead to enforcement action.
  - Enforcement notices served.
  - Injury to a member of the public or a visitor.
  - Near miss incidents.

### 7.4 Supervisors

- Provide positive leadership on H&S issues for the members of the work team for which they are responsible, including sub-contractors.
- Promote a positive attitude in the workforce and encourage behaviours that protect both people and the environment.
- Completion of suitable and sufficient risk assessments.
- Organise work to be carried out in accordance with relevant H&S risk assessments/method

statements.

- Monitor that personnel under their control comply with their individual responsibilities in H&S matters.
- Give personnel under their control, including sub-contractor's clear instructions about required methods of work.
- Where appropriate assess and implement any additional H&S controls required to address the needs of new employees, young persons, non-English speaking workers, disabled persons, pregnant women etc.
- Ensure appropriate arrangements are in place for two-way communication and where appropriate delivery of toolbox talks to the work teams.
- Identify and H&S training requirements of personnel under their control and advise appropriate management accordingly.
- See that accidents and incidents are reported immediately to the relevant manager.
- Ensure that personal protective clothing and equipment is used where identified as required and is properly maintained and stored.
- Ensure that the plant and equipment supplied is appropriate for the work and has any necessary certification. Ensure that plant and equipment are immediately put out of use if unsafe or presents a potential threat to the environment and records are kept and maintained in relation to its condition.
- Ensure that only authorised persons operate plant and equipment.
- Ensure that the disciplinary process for breaches of H&S procedures and rules is applied where necessary.
- Ensure that suitable and sufficient records are kept and maintained with regards to attendance and hours worked by Group Metropolitan Ltd Management, Supervisors, Operatives and Sub-Contractors.

## 7.5 HSEQ Manager

- Provide positive leadership for Group Metropolitan Ltd on HSEQ issues and promote the adoption of the best HSEQ practice.
- Monitor the effectiveness of the HSEQ management system and make recommendations for improvement as appropriate.
- Provide assistance and expert advice to all Group Metropolitan Ltd employees.
- Recommend annual HSEQ objectives. Monitor and report on the implementation of the approved objectives.
- Produce monthly reports on HSEQ performance.
- Ensure that there are appropriate processes are in place for promptly alerting the business to significant accidents and incidents. Where appropriate, be involved in the investigation and ensure that the findings are reported.
- Review accident and incident reports and investigation reports, identify any trends and ensure that there is appropriate response to prevent future recurrence.

## 7.6 Managers Involved in Recruitment

- Ensure that arrangements exist to deliver the following:
  - All potential recruits receive pre-employment questionnaires which address all relevant H&S

issues.

- Managers and Supervisors are issued with the responsibilities under the H&S Policy of all staff for whom they have responsibility.
- On appointment, an appropriate H&S induction is given to all employees.
- Employees are issued with the H&S Policy together with their individual responsibilities under the H&S Policy.

## 7.7 Managers Involved in Procurement

- Ensure that arrangements exist to deliver the following:
  - Orders to suppliers for materials, plant and equipment etc. include relevant H&S requirements notified by the supplier.
  - Suppliers of materials, plant and equipment etc. are required to provide all necessary information and operating instructions so that their products can be used safely without risk to persons or the environment.
  - Where such information is received by the procurer that is passed on to the persons who will use the materials, plant equipment etc.
  - Orders to suppliers for employees include sufficient detail to adequately describe the work for which they are required.
  - Contractors and Labour Agencies are assessed as competent and adequately resourced for the work before contracts are placed.
  - Tendering contractors have been provided with the Standard Rules for Sub-Contractors on Safety, Health and the Environment and that compliance with the is a condition of contract.
  - No undertakings, either verbal or written, are given to any supplier, relieving it of its H&S responsibility.
  - Monitor that the above arrangements are effectively implemented.

## 7.8 Managers Involved in Installation

- Ensure that arrangements exist to deliver the following:
  - All plant and equipment are in a safe condition and that relevant, current inspection/thorough examination certificates are available for the relevant item of plant or equipment.
  - Plant and equipment hired is from an approved supplier and has current inspection/thorough examination certificates available with it.
  - Inspection, planned preventative maintenance, and periodic tests, and thorough examinations are carried out and that results are recorded.
  - Repairs and maintenance are carried out in a proper manner by competent personnel.
  - All plant and equipment defects notified are remedied and plant and equipment are immediately put out of service if it is unsafe or a risk to the environment.
- Monitor that the above arrangements are effectively implemented.

## 7.9 Employees

- Ensure that arrangements exist to deliver the following:
  - Set a good personal example on H&S issues within your area of operation.
  - Take care of your own health and safety whilst at work, ensure your activities do not adversely harm the health and safety of others or damage the environment.
  - Co-operate with the company in all matters of health and safety protection and make your contribution to reducing accidents and conserving natural resources.
  - Ensure you have been fully briefed on, and have a good understating of, the task at hand. Always work in accordance with the instructions given and any written H&S risk assessments/method statements. Report any conflict.
  - Never deviate from an agreed method of working unless the supervisor or relevant manager has been notified and authorisation has been obtained.
  - Ensure that you have and use the correct access, tools, equipment and personal protection for work.
  - Ensure that before any work is undertaken, check that the area of work is free from hazards and that you are aware of the surroundings, and that nothing has changed that would have an effect on the original safe system of work.
  - Never undertake hazardous operations nor operate any items of plant equipment unless trained and authorised to do so.
  - Maintain a tidy workplace with an appropriate level of cleanliness.
  - Report to immediate supervisor any defects in plant or equipment or unsafe methods of work and ensure that plant, equipment and premises are left in a safe and secure state and place when unattended. Do not operate any item of plant or equipment that has become defective.
  - If you are asked to undertake a task that you feel is unsafe or for which you feel you do not have the appropriate knowledge or training, report this to your immediate supervisor.

## 8.0 Arrangements

### 8.1 Induction

Persons entering employment with Group Metropolitan Ltd shall undergo induction training given by his/her line manager.

During the induction process, the following topics shall be covered:

- Company Commitment to Health and Safety.
- An Outline of the Company.
- Key Personnel.
- Access and Egress.
- Demarcation and Safe Working Areas.
- Site Hazards and Risks.
- Fire and Emergency Procedures.
- No Smoking Policy.

- Alcohol and Drugs Policy.
- Accident, Incident & Hazard Reporting.
- First Aid Facilities.
- Company Health and Safety Policy.
- Specific Health and Safety Procedures.
- Disciplinary Procedures.
- Health Surveillance.

Inductions will be recorded, and records will be kept using Employee Induction Record.

Site inductions to be completed on a site-by-site basis for all new starters to the project (employees, sub-contractors and agency). Site inductions to be conducted by the site management team. Completion and attendance of the site inductions to be completed on Breadcrumb.

Group Metropolitan Ltd approved barriers:

- Chapter 8 barriers.
- Heras fencing.
- Concrete barriers.
- Crash tested barriers rated Class A / 78 mph.
- Retractable barriers.
- Edge protection as per manufacturer's guidelines.
- Tape or rope to only be used in low-risk environments, where no sudden changes in height occur and are not in the direct vicinity of a work zone, i.e. open plan safe route allocation.

Group Metropolitan Ltd prohibited barriers:

- Incomplete edge protection (e.g., missing guardrails or gaps allowing materials, tools, or personnel to fall through).
- Unstable or poorly secured fencing (e.g., not anchored, easily moved, or blown over by wind).
- Barriers which fail to control traffic flow or provide clear segregation between plant/vehicular movement and pedestrian walkways.
- Uncontrolled access to exclusion zones (e.g., missing signage or lock-off systems allowing unauthorised entry).
- Failure to protect the public (e.g., site boundaries not properly fenced, allowing public access including children).
- Materials or tools falling outside the site boundary due to insufficient perimeter barriers.
- Damaged or poorly maintained barriers (e.g., broken panels, missing fixings, or barriers left open).

## 8.2 Accident, Incident & Hazard Reporting

All accidents, ill health, dangerous occurrences, near miss incidents and hazards shall be reported as indicated on the Accident and Incident Reporting Procedure. The details of any accidents, incidents and dangerous occurrences will be recorded using the Accident and Incident Record. Any witness statements taken after any accident, incident or dangerous occurrence is to be recorded using an Accident – Incident Witness Statement.

Any such accidents/incidents requiring statutory reporting to the regulating authority under current legislation shall be reported by the relevant responsible person.

It is important that in addition to accident and incident reporting, the reporting of hazards (i.e. unsafe acts or conditions) and near misses is undertaken also. This is to ensure proactive safety management and assist in the reduction of injury, damage and loss throughout Group Metropolitan Ltd.

All near misses and hazards will be investigated locally by relevant Group Metropolitan Ltd Management. Any corrective actions that may have been identified during any investigation need to be recorded and relevant Group Metropolitan Ltd Management shall ensure that any corrective actions noted are implemented.

### 8.3 Site Related Arrangements

When any Group Metropolitan Ltd operative/sub-contractor attends site to carry out work activities, for the first time, a Group Metropolitan Ltd Site Induction shall be completed. This consists of the communication of site-specific health and safety and arrangements to the operative.

A Post Induction Questionnaire shall be used to ensure that all inductees have understood the Group Metropolitan Ltd Site Induction and to ensure that formal records of induction are maintained.

The operative will also receive a site induction certificate to record their attendance and understanding.

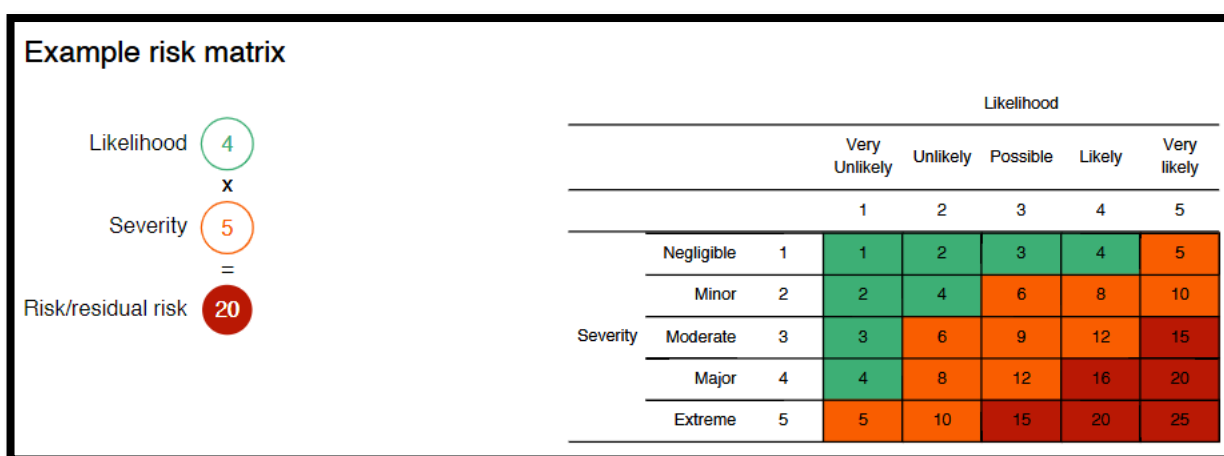
Group Metropolitan Ltd shall also complete the Preventing of Illegal Working Checklist, regarding the operative, to ensure that the operative is working in accordance with employment legislation.

Group Metropolitan Ltd Site Supervision shall also be subject to a specific induction, which shall detail their site-specific responsibilities, in addition to those detailed within the Group Metropolitan Ltd H&S Policy – Part 1 (see specific Appendix for details). This induction shall be documented using the Supervisor Post Induction Record with further information provided, in the form of 'Supervisor Guidance'.

### 8.4 Risk Assessment & Method Statement

All work activities and work areas that expose employees or others to foreseeable significant risks will be subject to a Risk Assessment. All personnel and others affected by the works shall be informed of the findings of the risk assessment. Any such briefings or communication of the contents of a risk assessment shall be recorded. All risk assessments shall be periodically reviewed and/or when a change in circumstances occurs. When reviewing the risk assessment, the effectiveness of existing controls must be considered and assessed accordingly.

Should a risk assessment evaluation determine an activity and/or task to be a high risk, then a Method Statement shall also be produced. The Method Statement will identify in detail the safe method in which the activity and/or task is to be undertaken. A risk matrix of likelihood and severity to be considered when assessing the risks for the methodology. See example risk matrix below for reference, taken from GML's RAMS template.



Risk assessments will reference hazards included in routine and non-routine activities and situations arising

from, but not limited to:

1. Infrastructure, equipment, materials, substances and the physical condition of the workplace.
2. Product and service design, research, development, testing, production, assembly, construction, service delivery, maintenance and disposal.
3. Human factors.
4. How the work is performed.

For guidance on completing the Method Statement template, see Method Statement Guidance For guidance when reviewing Method Statements and Risk Assessments submitted by others the Risk Assessment & Method Statement Evaluation can be used for this purpose.

All assessments will be carried out by personnel who are trained and suitably competent in the activity and/or task area being risk assessed. To ensure that any such documentation produced has been checked by all relevant persons, these documents will be circulated in accordance with the Method Statement & Risk Assessment Circulation Document.

For short duration or minor works, whereby, it may be impractical to create both a Risk Assessment and Method Statement (or where a small amendment is required), a Task Sheet shall be created to ensure any additional risks are suitably mitigated with a specific sequence of detailed work. A Task Sheet may only be utilised whereby it is directly anchored to a specific set of Risk Assessments and Method Statements and shall not be created instead of such documentation.

Site specific Risk Assessments, Method Statements and Task Sheets shall be periodically reviewed at intervals not exceeding 6 months, or when a change in circumstances, process, risk, method or environment necessitates a review. A site-specific Method Statement and Risk Assessment Register shall also be maintained, detailing such reviews.

Risk Assessments and method statements must be completed in conjunction with the scope set out in GML's HSEQ Management System (**HS030**). As set out within the scope outlined in the HSEQ Management System, client's system, regulatory requirements, customer requirements, safety and welfare of employees and contractors must be considered when preparing project-specific risk assessments and method statements.

## 8.5 Signing of Documentation

Group Metropolitan Ltd is committed to maintaining accurate, compliant, and fully authorised records across all business operations. To support this commitment, all employees, subcontractors, and authorised personnel must ensure that all required documentation is completed, reviewed, and signed in accordance with company procedures.

It is the responsibility of every individual involved in the creation, handling, or approval of documentation to ensure that signatures are obtained correctly, promptly, and in line with established governance, compliance, and quality assurance standards. This includes, but is not limited to, operational forms, safety records, timesheets, inspection reports, permits, and contractual documents.

All documentation must be:

- Accurate, complete, and free from omissions.
- Signed by the appropriate authorised person.
- Submitted within required deadlines.
- Stored and recorded in accordance with company policy.

Failure to follow signing requirements may result in delays in works, non-compliance, audit findings, or disciplinary action (depending on the severity of the breach) as per GML disciplinary procedures.

## 8.6 COSHH Storage and Use

The company is committed to ensuring the safe use, handling, and storage of hazardous substances in line with the Control of Substances Hazardous to Health Regulations 2002 (COSHH), the Health and Safety at Work etc. Act 1974, the Management of Health and Safety at Work Regulations 1999, and relevant guidance including HSE HSG51 (Storage of Flammable Liquids).

All hazardous substances used or stored on site must be logged in the site's COSHH Register (**HS088 - COSHH Register**), which must be kept up to date and accessible to all relevant personnel.

Each substance must be accompanied by:

- A current COSHH Assessment detailing risks, controls, required PPE, and emergency procedures.
- A valid Safety Data Sheet (SDS / MSDS) from the manufacturer or supplier.

Copies of both the assessment and the SDS must:

- Be stored with the corresponding substance in the COSHH cabinet, and;
- Be included within the project RAMS (Risk Assessment and Method Statement) so they can be briefed and signed by all operatives. Operatives must sign to confirm they have received and understood the relevant COSHH information.

All COSHH items must be stored in compliant, clearly labelled COSHH cabinets that are banded to 110% of total container capacity, in well-ventilated, secure areas away from ignition sources or incompatible materials.

## 8.7 Gas Cylinders and Bottles Storage and Use

The company is committed to ensuring the safe handling and storage of all gas cylinders used on site, in line with:

- The Pressure Systems Safety Regulations 2000 (PSSR).
- The Dangerous Substances and Explosive Atmospheres Regulations 2002 (DSEAR).
- The Health and Safety at Work etc. Act 1974.
- HSE INDG297 (Safe Use of Gas Cylinders).
- HSG139 (Gas Welding and Cutting Equipment).

All gas bottles must be stored:

- In designated gas cages, located outdoors where possible, and well-ventilated.
- Upright and securely restrained using chains or straps to prevent tipping.
- Segregated by type (e.g. flammable gases stored separately from oxidising gases).

When in use, gas cylinders must be:

- Transported using a purpose-built upright cylinder trolley with a secure strap.
- Stored upright and kept away from heat sources, open flames, or areas of high foot traffic.

Oxy-acetylene equipment is strictly prohibited on all company sites due to the high fire and explosion risk associated with acetylene's unstable nature and sensitivity to pressure and temperature. As a safer alternative, oxy-propane equipment are permitted and must be used in accordance with site-specific RAMS, manufacturer guidance, and relevant training.

Only trained and authorised operatives may handle or operate gas systems. All equipment must be regularly

inspected, and defective hoses, regulators, or fittings must be removed from service immediately.

To support compliance, the following documents must be maintained on site:

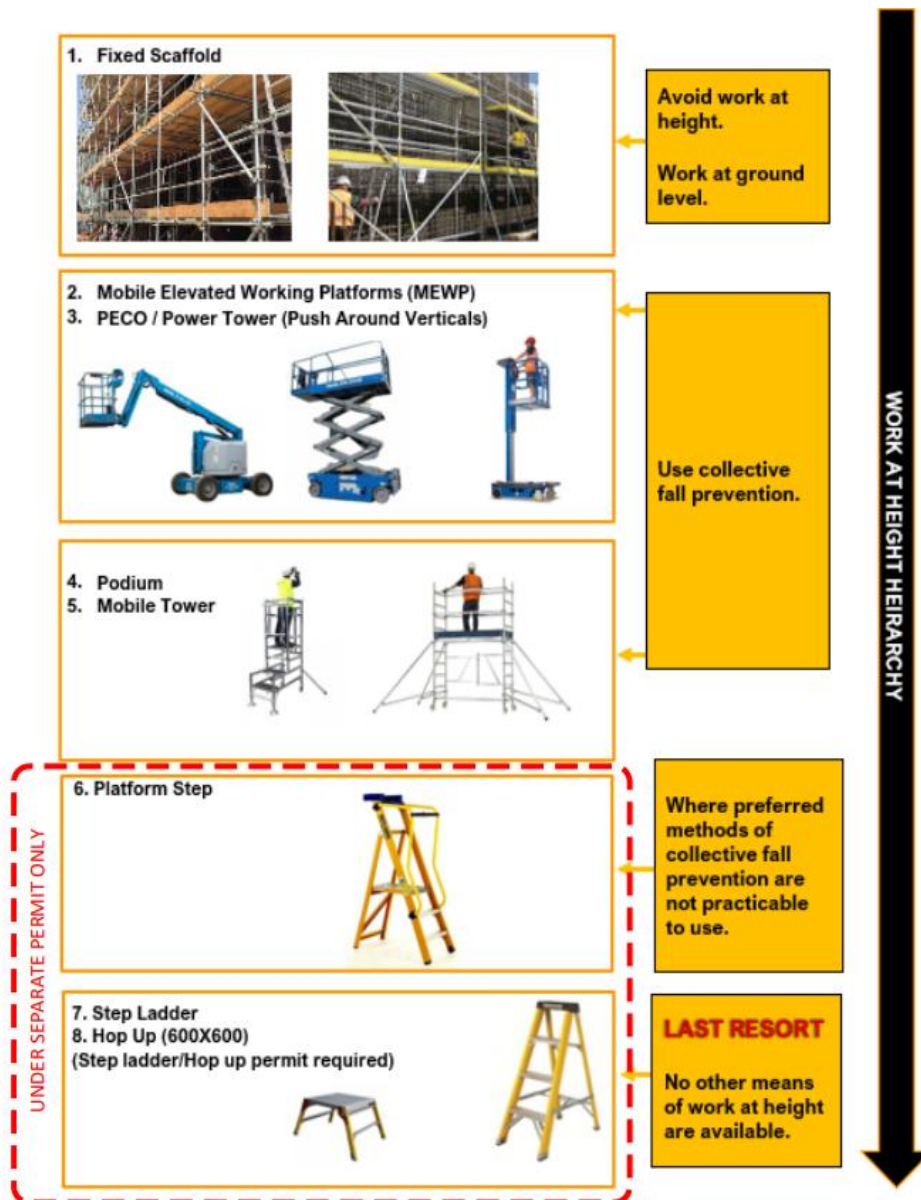
- **HS096 - Weekly Gas Cylinder Inspection Checklist** – to verify the condition, storage, and security of all gas bottles in use.
- **HS097 - Weekly Gas Cage Inspection Checklist** – to ensure gas storage cages remain compliant, undamaged, secure, and appropriately ventilated.

### 8.8 Working at Height

Group Metropolitan Ltd will:

- Avoid work at height where it is possible to do so.
- Using work equipment or the other measures to prevent falls where work at height cannot be avoided.
- Where risk of fall cannot be eliminated, work equipment or other measures will be implemented to minimise the distance and consequences of a fall should one occur.

The selection of access equipment will be determined according to the working at height hierarchy (see below).



Working at height shall be undertaken through the use of safe systems of work developed specifically for the working activity via a risk assessment.

Hazards associated with working at height shall be assessed, with control measures developed and implemented to eliminate or minimise any risk.

Stepladders (Class 1) shall only be used as the last resort and upon a site-specific risk assessment being conducted.

Evidence shall also be available that illustrates that alternative methods of working at height have been considered.

All employees who undertake work at height shall have had training to ensure that they have a satisfactory level of awareness in relation to the hazards of working at height, in particular the requirements of the Working at Height Regulations and the type of control measures needed to eliminate or sufficiently reduce the hazards posed by working at height.

All work at height will be conducted in accordance with Group Metropolitan's Working at Height Policy (Controlled Doc No. PS030).

### **8.9 Working within Risers**

It is recognised that carrying out activities within riser shafts is a particularly hazardous operation and extreme care should be taken both to ensure the safety of the operatives and just as importantly the safety of others.

The main dangers are from persons falling or being struck by objects falling from above.

Before commencement of work the most appropriate method of installation shall be clearly established and understood by those undertaking the works and those who may be affected by the works. This will include an analysis of access and egress, methods to prevent persons from being exposed to falls, methods to prevent persons from falling and where persons cannot be prevented from falling, methods to prevent injury should a fall occur.

Measures shall also be taken to prevent items of equipment and tooling from falling or prevent persons from entering the riser, where there may be a risk items of equipment and/or tooling falling. A risk assessment and method statement shall consider all of the above. It is necessary to establish the need for a Permit to Work System when considering safe working within riser shafts.

It more normally would be a requirement of the client/main contractor and if so, procedures will be established by the client/main contractor.

On some sites Group Metropolitan Ltd, may be required to operate the permit system. The Group Metropolitan Ltd Access Permit (**HS051**) can be used for this purpose. In all cases whatever system is to be used shall be identified early in the contract by the Project Manager and should incorporate the following:

- Only one access permit system should be in operation for all traders who need to access risers.
- The access permit system should be operated by one authority only (nominated people only to sign permits). If Group Metropolitan Ltd are operating the permit system it will usually be the Site Manager or his designated deputy, i.e. Site Supervisor that issue permits.
- Operatives **MUST NOT** enter the riser shaft without an access permit. If extra operatives are required in the shaft permit shall be re-issued.
- Only trade should work in the riser at any one time, unless suitable and sufficient control measures can be implemented.
- Access permits should only be issued for one shift period and should be timed and dated.
- Any access permit issued shall be displayed or be available at the work face.
- Any Health and Safety rules or requirements specified by the access permit shall be complied with. When there is any conflict with Group Metropolitan Ltd safety requirements, the matter should be

referred to the Project Manager and/or Health and Safety Advisor.

- All access permits shall be returned on completion of the work or expiry of the permit.
- When a permit to work system is in operation, signs should be erected in the area to notify all site personnel.

It is essential that personnel who operate the system are aware of the permit procedure and are properly instructed in the operation of the permit system.

It is not adequate to assume that because you are in possession of an access permit that no other operatives will be in the riser (above or below), **ALWAYS** check at the outset of the work **AND** at regular intervals during the work that all safety notices are in position and no other operatives are in the shaft.

### 8.10 Electricity

Group Metropolitan Ltd will ensure that all electrical works comply with the Electricity at Work Regulations and understand their duties and responsibilities as detailed within these regulations.

Group Metropolitan Ltd uses only competent persons to undertake all electrical works and strive to seek full compliance with BS7671: Requirements for Electrical Installations (Current Edition).

All portable appliances will be serviced in accordance with the Institute of Electrical Engineers Codes of Practice for Service Inspection and Testing of Electrical Equipment.

Where a sub-contractor needs to work on any electrical system or equipment, then an Electrical Work Permit shall be completed and issued by a suitable Group Metropolitan Ltd representative.

### 8.11 Portable Appliance Testing (PAT)

To ensure the safe use of portable electrical equipment, the company enforces a structured Portable Appliance Testing (PAT) regime in line with the Electricity at Work Regulations 1989, the Health and Safety at Work etc. Act 1974, and HSE guidance HSG107 – Maintaining Portable and Transportable Electrical Equipment (Third edition).

All portable electrical equipment used on construction sites must be formally inspected and PAT tested every 3 months, due to the high risk and physically demanding environment. For office-based equipment, where the risk is considerably lower, PAT testing will be carried out annually, unless otherwise specified by a site-specific risk assessment.

A PAT testing register must be maintained at all times. This register will include a record of all portable electrical equipment, test results, inspection dates, retest due dates, and any remedial actions taken.

All testing equipment used must be calibrated annually, and a valid calibration certificate must be available and accessible for auditing purposes.

PAT testing must only be carried out by a competent person who has received appropriate training and holds a recognised PAT testing qualification, such as the City & Guilds 2377-77 (or equivalent). The individual must demonstrate a clear understanding of electrical safety, testing procedures, and the ability to correctly interpret test results.

Defective or failed equipment must be immediately removed from service, labelled appropriately, and either repaired by a qualified electrician or safely disposed of.

Frequencies detailed below, as per HSG107 (Third Edition).

Type of business		User checks	Formal visual inspection	Combined inspection and test
Construction	110V equipment	Yes, weekly	Yes, monthly	Yes, before first use on site then 3-monthly
	230V equipment	Yes, daily/every shift	Yes, weekly	Yes, before first use on site then monthly
	Fixed RCDs	Yes, daily/every shift	Yes, weekly	Yes, before first use on site, then 3-monthly (portable RCDs – monthly)
	Equipment site offices	Yes, monthly	Yes, 6-monthly	Yes, before first use on site then yearly

### 8.12 Plant and Equipment (including Electrical Equipment)

All plant and equipment shall only be used by trained and qualified persons.

The work equipment selected will be ergonomically suitable and fit for purpose. Work equipment inspections will be undertaken relevant to the plant and equipment in use.

Inspections by operatives using any plant or work equipment shall be carried out before use on a daily basis, however these inspections do not need to be formally recorded. Formal inspections on all work equipment shall be carried out at suitable frequency; this will be dependent on frequency of use and the working environment.

The checklists and registers listed below are to be used as required;

- Mobile Access Tower Checklist.
- Fall Arrest Equipment Register.
- Ladder Permit & Checklist.
- Weekly Harness & Lanyard Inspection.
- Lifting Gear Checklist.
- Ladder Register.
- Plant and Equipment Checklist.
- Plant and Equipment Register.
- Weekly Tool Checklist.

*The above list is not exhaustive.*

Regarding Mobile Elevated Working Platforms (MEWPs – and other similar access equipment) used on Group Metropolitan Ltd sites, the following items shall be displayed upon the MEWPs at all times.

- MEWP Daily Checklist.
- MEWP Identification Signage.
- MEWP Rescue Plan.
- Red 'Do Not Use' Signage (when relevant).

All relevant plant and work equipment will be the subject of statutory or periodic inspections. Electrical equipment will be the subject of regular Portable Appliance Testing. Results of portable appliance testing are to be recorded on a Portable Appliance Test Record. Employees shall not use and report faulty or defective equipment. Repairs will only be carried out by competent and authorised person.

### 8.13 Use of Tools – Power Tools

Under UK Health and Safety Executive (HSE) guidance, a power tool is defined as any equipment with moving parts that are powered by an energy source other than manual effort. This includes electric, battery-operated, and compressed air tools.

As part of our commitment to maintaining a safe working environment, the company sets out the following policy regarding the selection, use, maintenance, and inspection of all tools, with particular emphasis on power tools.

All power tools used on construction sites must be suitable for their intended purpose and used only by trained and authorised personnel. Employees are required to use tools in accordance with manufacturer instructions, training received, and relevant risk assessments and method statements.

In accordance with the **Provision and Use of Work Equipment Regulations 1998 (PUWER)**, the company has a legal duty to ensure that all work equipment – including power tools – is:

- Suitable for the intended use.
- Safe for use, maintained in a safe condition and inspected regularly.
- Used only by individuals who have received adequate information, instruction, and training.

To ensure compliance with PUWER regulations, all power tools must undergo a formal inspection every 7 working days via '**HS098 - Weekly Tool Inspection**'. Where work activities are shorter than seven days i.e. 'small works', any power tool used during that period must still be inspected prior to use. These inspections must be documented and carried out by a competent person.

Any defects or issues identified must be reported immediately, and the tool must be taken out of service until it has been repaired or replaced.

In addition to formal inspections, users must conduct visual checks of power tools before each use, looking for signs of wear, damage, or malfunction, including checking plugs, cables, guards, and switches. Damaged or unsafe tools must not be used under any circumstances.

For all tasks involving power tools, operatives must wear the specified personal protective equipment (PPE) as defined by the activity and associated risk assessment. **PPE must be worn at all times** during operation to ensure compliance with site safety protocols and risk control measures.

### 8.14 Lifting Operations and Lifting Equipment

Group Metropolitan Ltd shall ensure that all requirements of the Lifting Operations and Lifting Equipment Regulations 1998 and adhered to, as far as ensuring that all lifting equipment is.

- Sufficiently strong, stable and suitable for the proposed use.
- Positioned or installed to prevent risk of injury, e.g. from the equipment or the load falling or striking people.
- Visibly marked with any appropriate information to be taken into account for its safe use, e.g. safe working loads. Accessories, e.g. slings, clamps etc., should be similarly marked.

Additionally, it will be ensured that;

- All loads to be lifted or lowered shall be suitable ensuring the lifting points and load itself are stable etc.

- Lifting operations are planned, supervised and carried out in a safe manner by people who are competent.
- Where equipment is used for lifting people it is marked accordingly, and it should be safe for such a purpose, e.g. all necessary precautions have been taken to eliminate or reduce any risk.
- Lifting equipment shall be thoroughly examined in use at the recommended intervals, which are:
  - **At least six months for accessories and equipment used for lifting people and;**
  - **At a minimum, annually for all other equipment or at intervals laid down in an examination scheme drawn up by a competent person.**
- All examination work shall be performed by a competent person; and
- Following a thorough examination or inspection of any lifting equipment, a report is submitted by the competent person to the employer to take the appropriate action.

Should the need for lifting equipment be identified, Group Metropolitan Ltd shall ensure that a Lifting Plan is generated prior to the lift and also ensure that;

Those planning lift know:

- The typical elements in a simple lifting plan.
- That capability of the equipment; if it is not known, information about the capability shall be sought from the manufacturer.

Elements of the lifting plan, as identified in the guidance, are:

- Equipment to be used shall be within its safe working load (SWL).
- The plan shall be based on risk assessment, as is also required by regulation 3 of the Management of Health and Safety at Work Regulations 1999.
- It shall be drawn up by a competent person – for example, planning of individual routine lifting operations may be the responsibility of those who carry them out (e.g., a slinger or operator); the planner shall be a competent person by virtue of their knowledge AND expertise in particular lifting operations.
- The plan should be written down for complex operations.

Group Metropolitan Ltd shall ensure that the principles within BS 7121 are applied, when using lifting equipment.

The documentation listed below is to be used to assist in the management of lifting equipment and accessories:

- Document Frequency Table.
- HIAB Pre-Lifting Checklist.
- FLT Checklist.
- Lifting Gear Register.
- MEWP Checklist.
- MEWP Register.
- Lifting Gear Checklist.
- Pop Up Checklist.

When carrying out lifting operations within risers, task specific risk assessments and method statements shall be produced for all such activities. This will assist in providing a suitable and sufficient safe system of work, which will identify the methodology, equipment and competency of operatives carrying out the work.

Any documentation produced for lifting operations within risers shall be circulated as detailed within the Method Statement & Risk Assessment Circulation Document.

### 8.15 Personal Fall Protection Equipment

Group Metropolitan Ltd shall ensure that all requirements of the Work at Height Regulations (relating to personal fall protection equipment) are adhered to, so far as ensuring that all equipment is;

- Suitable for the particular circumstances of the task.
- Used for the particular task within its design limits.
- Meets the standard relevant to its intended use.
- It has compatible components so the safe function of any one component is not adversely affected by, and does not interfere with, that of another.

Should the need for personal fall protection equipment be identified, Group Metropolitan Ltd shall also ensure that:

- New equipment is checked to make sure it is appropriate for the intended use, that it operates correctly and that it is in good condition. All equipment is checked before each use in addition to pre-use checks, equipment has had a detailed inspection by a competent person in accordance with a schedule drawn up by them.
- Interim inspections are made between the inspections by the competent person where a hazard that could cause significant deterioration in the equipment is present.
- Damaged equipment is taken out of service immediately.
- Anchors and anchor points are of adequate strength.
- Anchors and anchor points are above the user so that the anchor line or lanyard is taut or has as little slack as possible.
- There is a rescue plan in place and suitable people and equipment available to put it into effect.

In relation to persons using the personal fall protection equipment, it shall be ensured that they;

- Are competent to check their equipment for defects and do this before every use.
- Are suitably trained and assessed for competency in the use of their personal fall protection systems and equipment for the particular application.
- Have read and understood the product information before using the equipment.
- Have checked that the components in the system are compatible.

In addition to the arrangement details in Section (Working at Height) and (Site Plant & Equipment), the following documentation listed shall be used to assist these arrangements:

- Fall Arrest Equipment Register.
- Fall Arrest Equipment Checklist.
- Weekly Harness & Lanyard Inspection.

### 8.16 Manual Handling

Before deciding to conduct an operation that requires a load to be lifted, pushed, pulled or moved by bodily force, consideration shall be given as to avoiding the need to undertake a manual handling operation by using automated or mechanical equipment. Consideration to such operations can be recorded on the risk assessment conducted for the activity being undertaken.

For activities that require a detailed assessment, a Manual Handling Assessment can be completed. In conducting the manual handling assessment, the following factors shall be taken into consideration:

- The task, i.e. what, where, when, how is the load to be moved?
- The capabilities of the individual(s) who are to undertake the task.
- The weight, shape and centre of gravity of the load.
- The environment where the task is to be performed.

All tasks involving the movement of loads by bodily force will, where reasonably practicable to do so, be avoided, using automation or mechanical aids. All personnel involved in manual handling operations will receive suitable information and training.

### 8.17 Personal Protective Equipment (PPE)

All personnel will be provided with suitable personal protective equipment (PPE) where required to do so by risk assessment. All PPE issued on site will be recorded on the PPE Register.

All equipment supplied will be to the relevant British or European standard and training given as to its proper and intended use.

It will be the employee's duty to co-operate in the wearing of the equipment when and where required, to not abuse the equipment and to ensure that any defects noted with any PPE issued are reported to their Supervisor.

It will be the responsibility of the Supervisor to ensure that employees wear the PPE recommended for the specific activities or tasks being undertaken as specified within the relevant risk assessment/method statement and within any site-specific rules.

At all times Group Metropolitan Ltd personnel (including both Site Management and Operatives) will be expected to wear the following PPE at all times whilst in construction locations;

PPE	Minimum Standard Adopted
High Visibility Vest	EN471 Standard; Displaying Group Metropolitan Ltd Insignia
Hard Hat	EN 397 Standard; Displaying Group Metropolitan Ltd Insignia
Safety Foot Wear (Boots)	ISO 20345 Standard; S3 SRC Standard, Lace Up with Mid-Sole, Steel Toecap and Ankle Protection
Hand Protection (Gloves)	EN388 Standard; Cut Level 4X43C Minimum
Safety Glasses	EN16321 Standard

Additional tasks, specific PPE may be required, such as:

- Impact Safety Goggles EN16321 E
- Safety Visor EN16321 E
- Hearing Protection EN352 (SNR 30+)
- FFP3 Respiratory Protection

*The above list is not exhaustive.*

### 8.18 Noise

Personal exposure to noise levels should not exceed 80dB(A) for excess of 8 hours per day, this is a legal requirement. Steps should be taken to reduce the noise or sound pressure level to the lowest level reasonably practicable.

Wherever there is a noisy environment, where employees need to shout to communicate with a person 2 meters away this is an indicator that noise levels are being exceeded.

Where employees are exposed to noise levels exceeding 80dB(A), employees are provided with hearing protection, such as ear defenders or ear plugs (Rated SNR 30+).

The employee has a responsibility to wear the hearing protection, and the Supervisor is responsible to ensure it is worn.

Where noise is considered harmful, workers will be provided with increased breaks from the noise along with the PPE requirements.

Group Metropolitan Ltd are to provide employees with information about the noise levels, the harm this could have on the employee should the protection not be worn and the disciplinary action that will be taken should the PPE not be worn. Signage shall be posted where the noise level exceeds 80dB(A), the sign is a mandatory sign, which has a blue background with a white pictogram showing the head of a person wearing ear protection.

Ear protectors shall be maintained and stored as the manufacturer's instructions, any defects are to be reported to the manager.

Ear defenders and/or ear plugs are to be provided to the employee free of charge by the employer.

For prolonged noise exposure, workers will be provided with hearing health assessments.

Group Metropolitan Ltd will monitor employees wearing their hearing protection as identified in the risk assessment.

The Health and Safety Advisor will audit noise and/or risk assessments to check if noise has been suitably considered, controlled and check that relevant control measures have been identified and implemented.

Any noise assessments shall be undertaken and recorded by a competent person.

### 8.19 Vibration

The Control of Vibration at Work Regulations 2005 are in place to protect staff against risks to their health while working with equipment.

There are two areas of concern, which are:

- Hand Arm Vibration (HAV); and
- Whole Body Vibration.

Most people who drive road-going vehicles at work are not likely to experience high levels of whole-body vibration. It is, therefore, unlikely that any action will be required regarding whole body vibration.

Whilst Group Metropolitan Ltd realises that exposure to vibration does occur, it should be considered as a significant risk to its employees. Therefore, this policy outlines the steps to be taken by Group Metropolitan Ltd to ensure that the risk of suffering ill health from using handheld power tools, or hand guided machines is eliminated or minimised.

Risk control will be affected by giving careful consideration to the selection and use of new equipment and by ensuring that any use of new or existing equipment does not exceed the daily exposure limit (ELV) value of 5 m/s<sup>2</sup> A(8).

In addition, where an individual's daily exposure exceeds the exposure action value (EAV) of 2.5 m/s<sup>2</sup> A(8) steps are taken to minimise exposure.

### Assessing the risk and developing an action plan for control

- The task, i.e. what, where, when, how is the load to be moved?
- Use impact or percussive (e.g., hammer action) tools for more than about 15 minutes per day?
- Use rotary action machines (e.g., grinders or sanders) for more than an hour a day?
- Are there vibration warnings from tool/equipment manufacturers or suppliers for the tools being used?
- Have any employees been affected by vibration?

If any of these can be answered positively then an assessment is necessary. Risk assessment will be conducted by:

- Identification of individuals at risk.
- Observation of specific work practices.
- Referring to relevant information on the probable level of vibration likely to be encountered when the equipment is used in particular working conditions.
- When necessary, by measuring the level of vibration individuals are liable to be exposed to.

Consideration shall also be given to:

- Duration of exposure, including any exposure to intermittent vibration or repeated shocks.
- Effect of vibration on the workplace or work equipment, including the proper handling of controls, the reading of indicators, the stability of structures and the security of joints.
- Information provided by the manufacturers of work equipment.
- Availability or replacement equipment designed to reduce exposure to vibration.
- Specific working conditions such as low temperatures.
- Appropriate information obtained from health surveillance including, where possible, published information.

Using the probable level of vibration for the equipment and the duration of exposure, a calculation can be made by using the online exposure calculator at [or via data supplied by the tooling manufacturer/supplier.](#)

This will assist in determining the daily exposure limit value associated with the equipment and ensure use of the equipment will be kept below this value.

Exposure to vibration is also monitored through the HAVS Operative Weekly Assessment by the HAVS Supervisor Weekly Check and Health Surveillance.

## **8.20 Dust Control**

As part of our commitment to maintaining a safe working environment, the company sets out the following policy regarding the control of airborne dust across all construction activities.

All dust-generating tasks must be planned and executed using appropriate control measures. Employees are required to follow manufacturer instructions, training received, and relevant risk assessments and method statements when carrying out work that may produce dust.

In accordance with the **Control of Substances Hazardous to Health Regulations 2002 (COSHH)**, the company has a legal duty to ensure that exposure to construction dust is prevented or adequately controlled.

This includes:

- Eliminates dust at source wherever reasonably practicable.

- Using engineering controls such as dust extraction attachments and encapsulation methods.
- Providing suitable respiratory protective equipment (RPE) where required.
- Ensuring all control measures are maintained in effective working order.

To ensure compliance with COSHH regulations, the following dust control procedures must be implemented:

- Power tools must be fitted with appropriate dust extraction attachments.
- Dust encapsulation methods (e.g., sheeting, barriers) must be used to contain airborne particles.
- Dry sweeping is strictly prohibited due to the high risk of airborne dust exposure. All operatives must use wet spray and sweep methods to suppress dust before any cleaning activity is undertaken.
- M-Class hoovers rated EN60335-2-69, fitted with HEPA filters are permitted for removal of construction dust and debris, standard vacuum cleaners must not be used under any circumstances within construction working environments.
- FFP3-rated RPE must be worn, where specified by the risk assessment. ALL RPE must be face-fitted and maintained in accordance with manufacturer guidance.
- Visual checks of dust control equipment must be conducted before each use. Damaged or ineffective equipment must not be used under any circumstances.
- Any defects or issues identified with dust extraction equipment must be reported immediately, and the activity must cease until suitable controls are reinstated.

For all tasks involving dust-generating activities, operatives must wear the specified personal protective equipment (PPE) as defined by the activity and associated risk assessment. PPE must be always worn during operation to ensure compliance with site safety protocols and risk control measures.

## 8.21 Monitoring & Reviewing Performance

Regular reviews of health and safety performance based upon information from risk assessments, accident records, ill-health records, safety inspections and training allow a constant development and improvement in health and safety management. An annual review of health and safety performance will take place to ensure that a range of key performance indicators are set and achieved.

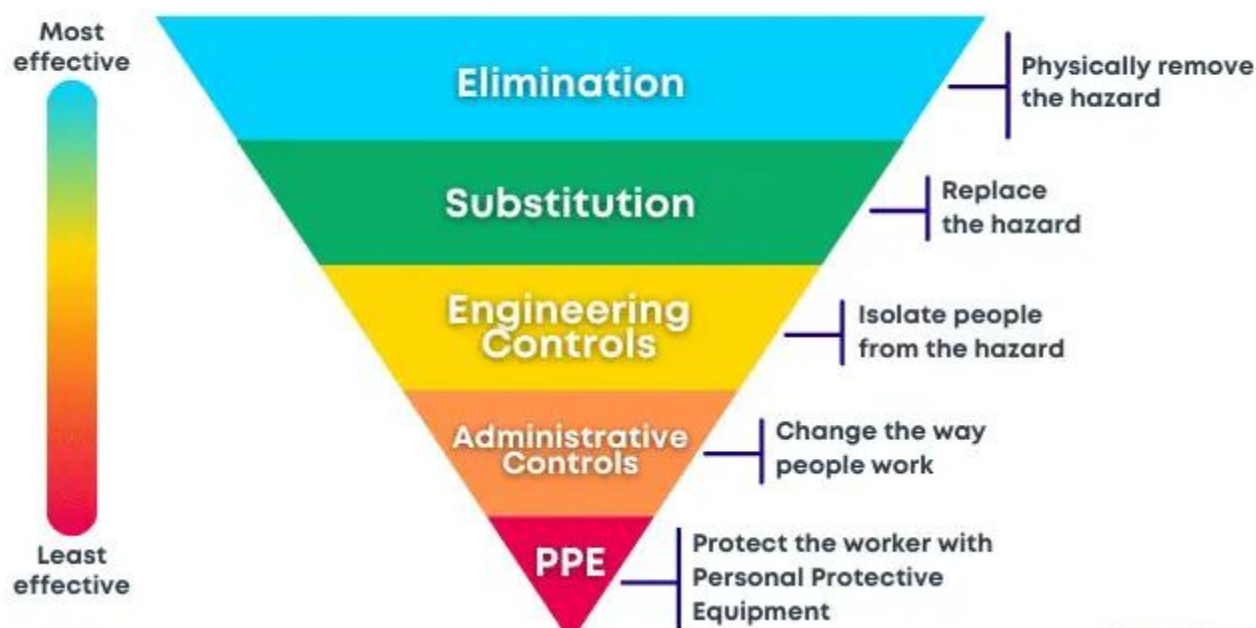
Group Metropolitan Ltd is committed to proactive measurement of its health and safety performance to ensure continuing improvement. This will include:

- Site inspections.
- Internal HSEQ Audits.
- Legal Compliance Audits.
- External Audits.
- Systems Management Audits.

The inspections carried out by Group Metropolitan Ltd personnel will be recorded using a Safety Inspection Report. It is important that any issues identified during inspections are recorded in sufficient detail, the persons responsible for rectifying the issues shall also be noted. When the issues noted during the inspection have been completed, the date of completion shall also be entered.

See below the hierarchy of controls for information relating to the management and implementation of actions and corrective actions, based on the findings of our audits and inspections.

## Hierarchy of Controls



### 8.22 Fire and Emergency Provision

The Managing Director will ensure that a suitable and sufficient Fire Risk Assessment is carried out at any location and/or site under the control of the Group Metropolitan Ltd and that any control measures identified are implemented and that the fire risk assessment is reviewed at desirable intervals.

Group Metropolitan Ltd will ensure that the requirements of the Health and Safety (First Aid) Regulations are met as a minimum. The arrangements made for summoning first aid will be clearly displayed throughout any premises under the control of Group Metropolitan Ltd they will also be communicated to new employees as part of the induction process. Any changes in the arrangements will be clearly communicated and made available for all.

The First Aid Checklist shall be used, to assist and ensure that these requirements are met.

### 8.23 Hot Works

As part of Group Metropolitan's commitment to maintaining a safe working environment, the company sets out the following policy regarding the planning, control, and execution of hot works across all operational activities.

All hot work tasks must be planned and carried out using appropriate control measures. Employees and contractors are required to follow manufacturer instructions, training received, and all relevant risk assessments, method statements, and permit to work procedures when undertaking any activity that may generate heat, sparks, or open flames.

Operations that produce heat but are not subjective to as follows:

- Any forms of welding activities.
- Oxy-propane cutting.
- Tar boilers.
- Roofing torches.
- Hot-melt asphalt works.

- Abrasive wheels activities.
- Invasive works which produce sparks i.e. metal drilling.
- Brazing.
- Soldering.
- Any maintenance activities involving open flames or high-temperature equipment.

Oxy acetylene is banned due to its high instability, explosive risk, and potential for flashback and cylinder decomposition. Oxy-propane provides a safer alternative, delivering effective cutting performance with lower explosion risk, improved stability, and easier compliance with UK construction fire-safety requirements.

In accordance with the Fire Safety Regulations 2022 and the Construction (Design and Management) Regulations 2015, the company has a legal duty to ensure that fire risks associated with hot works are prevented or adequately controlled. This includes:

- Eliminating the need for hot works wherever reasonably practicable.
- Using engineering controls and safe systems of work to minimise ignition risks.
- Ensuring combustible materials are removed, reduced, or protected before work begins.
- Maintaining all fire safety equipment and control measures in effective working order.

To ensure compliance with fire safety regulations, the following hot work control procedures must be implemented:

- A Hot Works Permit (HS047) must be issued before any hot work activity begins. No hot works may be carried out without a valid permit.
- All operatives must familiarise themselves with the according fire risk assessment, emergency procedures i.e. emergency call points, escape routes.
- The work area must be inspected and cleared of combustible materials. Where removal is not possible, suitable fire-retardant protection must be instated via the use of LPS1207 fire retardant sheeting.
- Hot works must not commence within areas that have the potential to carry sparks or hot embers i.e. near ventilation shafts, external.
- Suitable firefighting equipment (e.g., extinguishers, fire blankets) must be present at the work location and always remain accessible as well as maintained in good working order i.e. annual service to extinguishers.
- Hot work equipment must be inspected before use to ensure it is in safe working condition. Damaged or defective equipment must not be used under any circumstances.
- Adequate ventilation must be provided to prevent heat accumulation and the buildup of fumes or gases.
- Appropriate screening must be implemented, defined by the activity commencing.
- All hot work activities must cease immediately if unsafe conditions arise, including unexpected smoke, heat, or equipment malfunction.
- All voids must be suitably covered via the use of LPS1207 fire retardant sheeting.
- Operatives commencing hot works must be competent to carry out the associated tasks and a competent fire watcher must be appointed where required, remaining on duty throughout the activity and during the post work monitoring period.
- A 2hr mandatory post work fire watch must be carried out for the duration specified in the permit,

ensuring no smoldering materials or delayed ignition sources remain.

For all tasks involving hot works, operatives must wear the specified personal protective equipment (PPE) as defined by the activity and associated risk assessment. PPE must always be worn during operation to ensure compliance with site safety protocols and risk control measures.

## 8.24 Combustible Materials

As part of our commitment to maintaining a safe working environment, Group Metropolitan Ltd sets out the following policy regarding the storage and control of combustible materials across all work activities.

All combustible material storage must be planned and executed using appropriate control measures. Employees are required to follow manufacturer instructions, training received, and relevant risk assessments and method statements when handling or storing materials that may present a fire risk.

In accordance with the Fire Safety Regulations (FSR) 2022, Fire Safety Act (2021) Construction Design Management (CDM) 2015, the company has a legal duty to ensure that fire risks associated with combustible materials are eliminated or adequately controlled. This includes:

- Eliminating combustible materials wherever practicable.
- Using engineering controls such as fire-resistant storage structures and approved fire-retardant sheeting.
- Providing suitable personal protective equipment (PPE) where required.
- Ensuring all control measures are maintained in effective working order.

To ensure compliance with FSR (2022), FSA (2021) & CDM (2015) regulations, the following combustible-materials control procedures must be implemented:

- Combustible materials must be stored in designated fire-resistant areas providing appropriate levels of protection so far as reasonably practicable.
- Combustible materials stored externally are not required to be encapsulated with fire-retardant sheeting unless specifically requested. Where fire-retardant sheeting is used, it must be securely fixed or tied off to prevent accidental displacement, loss, or release of the sheeting. All external storage arrangements must comply with relevant risk assessments, client requirements, and site fire-safety controls.
- Fire-retardant sheeting rated LPS 1207 must be used where required to encapsulate, segregate, or shield excess combustible materials.
- Unauthorised or makeshift storage methods are strictly prohibited due to their increased risk of fire spread.
- Only the minimum necessary quantities of combustible materials may be kept within operational areas; bulk quantities must be stored in approved locations.
- All storage areas must be kept clean, tidy, and free from unnecessary combustible waste.
- Visual checks of fire-retardant sheeting, storage structures, and associated control equipment must be conducted before each use. Damaged or ineffective equipment must not be used under any circumstances.
- Any defects or issues identified with storage controls must be reported immediately, and the activity must cease until suitable controls are reinstated.

For all tasks involving the handling or storage of combustible materials, operatives must wear the specified personal protective equipment (PPE) as defined by the activity and associated risk assessment. PPE must

always be worn during operation to ensure compliance with site safety protocols and risk control measures.

## 8.25 Cutting Activities

As part of our commitment to maintaining a safe working environment, the company sets out the following policy regarding the planning, execution, and control of all cutting activities carried out on site.

All cutting activities must be risk assessed and carried out using suitable equipment and methods. Only trained and authorised personnel are permitted to undertake cutting tasks. Operatives must follow manufacturer instructions, training received, and the relevant risk assessments and method statements at all times.

Wherever reasonably practicable, materials must be prefabricated off-site to reduce the need for cutting activities on site. This aligns with the hierarchy of control measures as set by the company's visual standards guide. Where on-site cutting is unavoidable, all activities must be carried out on stable, purpose-built work benches, and materials must be securely fixed via clamps or other suitable restraints to prevent movement. Cutting without appropriate control measures in place, including secure fixing, surface support, personal protective equipment (PPE) and dust suppression—is strictly prohibited and constitutes a breach of site safety protocols.

In accordance with the Provision and Use of Work Equipment Regulations 1998 (PUWER), the company has a legal duty to ensure that all work equipment – including cutting tools and associated equipment – is:

- Suitable for intended use.
- Safe for use, maintained in a safe condition and inspected regularly.
- Used only by individuals who have received adequate information, instruction, and training.

To ensure compliance with PUWER 1998 regulations, all power tools must undergo a formal inspection every 7 working days via.

- **HS098 – Weekly Tool Inspection** – Examples of equipment include, but not limited to, skill saws, band saws, reciprocating saws etc.
- **HS094 – Weekly Chop Saw Checklist** – Examples of equipment include chop saws.
- **HS090 – Abrasive Wheel Inspection** – Examples of equipment include angle grinders.

Abrasive wheels should always be treated as the final option in the hierarchy of controls for cutting activities. Before resorting to their use, higher-level controls – such as eliminating the need for cutting, redesigning the task, substituting safer tools or materials, or implementing engineering controls like mechanical shears or guarded cutting stations – must be fully considered and exhausted. Administrative controls and training can further reduce risk, but they do not remove the inherent hazards associated with high-speed rotating wheels. Because abrasive wheels generate sparks, noise, dust, and the potential for wheel failure or kickback, they sit at the bottom of the hierarchy as a last resort, used only when no safer alternative can achieve the required outcome. A permit system (Hot work PTW) must be carried out for all activities.

Requirements for the use and implementation of abrasive wheels/angle grinder:

- Guard is correctly adjusted when in operational use.
- Secondary handle attached for 2-hand operational usage.
- Correct size for the task.
- Abrasive wheel must be rated EN 12413.
- Safety goggles rated EN16321 and SNR +30 rated hearing defenders.
- If the wheel shows signs cracking or is warped, then equipment is prohibited from use until a suitable replacement is provided.
- Materials must be secured when cut by suitable means and on stable work benches.

Where work activities are shorter than seven days (i.e. 'small works'), any cutting equipment used during that period must still be inspected prior to use. These inspections must be documented and carried out by a competent person. Any defects or issues identified must be reported immediately, and the equipment must be taken out of service until it has been repaired or replaced.

In addition to formal inspections, users must conduct visual checks of cutting equipment before each use, looking for signs of wear, damage, or malfunction. This includes checking blades, guards, fixings, and any dust extraction attachments. Damaged or unsafe equipment must not be used under any circumstances.

For all tasks involving cutting activities, operatives must wear the specified personal protective equipment (PPE) as defined by the activity and associated risk assessment. This will include eye protection, gloves, hearing protection, and respiratory protective equipment (RPE) where dust is generated. PPE must be worn at all times during the activity to ensure compliance with site safety protocols and risk control measures.



**VISUAL STANDARDS – MATERIAL CUTTING HIERARCHY**



VS020

Internal

## 8.26 Welfare Provision

Suitable and sufficient welfare facilities will be provided for all employees, these will include; toilets, washing facilities, rest accommodation and where appropriate drying rooms.

The welfare provision requirements are more clearly outlined in the Project Operational CDM Procedure.

## 8.27 Asbestos

Regarding site work, when acting as Principal Contractor Group Metropolitan Ltd shall provide.

Under the Control of Asbestos Regulations, Group Metropolitan Ltd recognises and accepts its duty to manage asbestos in non-domestic premises.

Group Metropolitan Ltd has an explicit duty to assess and manage the risks from asbestos. The Managing Director is ultimately responsible for the production and implementation of an asbestos management plan within its own business premises (should one be required).

The Group Metropolitan Ltd Asbestos Management Plan shall be controlled by the Managing Director, who will ensure that the management of asbestos is compliant with current legislation.

In order to manage the risk from asbestos, the Duty Holder shall ensure that a suitable and sufficient assessment is carried out as to whether asbestos is or isn't liable to be present within its own premises.

Where works are to be undertaken in premises under the control of other persons, information needs to be obtained as to the known location(s) of Asbestos Containing Materials (ACM's) within the premises and/or areas of work shall be made available by the clients representative to Group Metropolitan Ltd of the premises where the activities are to be undertaken.

In the absence of any information (such as asbestos registers, survey reports, etc.) relating to ACM's within any of Group Metropolitan Ltd clients' premises, it shall be assumed that asbestos is present and therefore appropriate controls, dependent upon the activity, shall be identified and implemented.

Where, during works associated with any site or project, it is considered that other asbestos containing materials may exist, the Group Metropolitan Ltd office shall be informed immediately and the work(s) suspended until the Client has been informed and remedial action has been agreed.

The Control of Asbestos Regulations (Regulation 10) states that every employer shall provide adequate instruction, information and training for those who are, or may be exposed to asbestos. In accordance with this Regulation, Group Metropolitan Ltd shall ensure that all staff who may come into contact with asbestos shall attend an Asbestos Awareness course that covers the following:

- The properties of asbestos, its health effects and the interaction of asbestos and smoking.
- The type of materials likely to contain asbestos.
- What work could cause asbestos exposure and the importance of preventing exposure.
- How work can be done safely and what equipment is needed.
- Emergency procedures.
- Hygiene facilities and decontamination.

Such training shall be undertaken at regular intervals to ensure any staff, that regularly have the risk of becoming exposed to asbestos, have the most up to date training and knowledge.

## 8.28 Waste Disposal

Where waste is generated during the course of Group Metropolitan Ltd activities then that waste shall be

disposed of in a controlled, safe and responsible manner.

Where such waste removal requires the application of special control measures to reduce hazards such as contamination, dust or risk of environmental pollution then suitable arrangements will be devised and implemented.

Any such arrangements will take into consideration current environmental legislation and its requirements. Group Metropolitan Ltd will comply with relevant requirements of any waste plans produced by ourselves internally and clients.

All waste disposals shall conform to client and our own procedures with the clients taking priority. Consideration for both their own and the clients' environmental objectives/targets shall be considered in any waste disposal plan.

### **8.29 Work Packs**

Group Metropolitan Ltd understands that safety documentation such as Risk Assessments and Method Statements are especially important to their employees whilst works are being conducted, as they provide vital information on the control measures to be implemented.

To ensure that important information relating to working activities is always available to employees, Group Metropolitan Ltd will ensure that 'Work Packs' (containing health and safety information) are present at every construction site workforce, with every working party or in every working locations occupied by Group Metropolitan Ltd.

These 'Work Packs' shall include copies of the following;

- Risk Assessments and Method Statements (relevant to the task being undertaken in that area, or by that working party).
- COSHH Assessments (relevant to the substances used in that area, or by that working party).
- Daily 'Safe Start' or Task Sheet.

Documents held within these 'Work Packs' shall be copies of the original information, held with the working party so that they may use them as reference when conducting their works, on every Group Metropolitan Ltd construction site.

### **8.30 Sub-Contractor Documentation Submittal (Friday Packs)**

All sub-contractors are required to submit a complete weekly documentation package (Friday Pack) no later than EOP every Friday or equivalent. Friday Packs must be submitted electronically and must include current progress information, labour and plant records, quality documentation, health, safety and environmental reports, and all relevant commercial records as required under the subcontract.

Documentation must be accurate, clearly labelled, and compliant with project document control standards. Late, incomplete, or inaccurate submissions may result in withheld payments, delayed approvals, non-conformance notices, or other contractual actions. Continuous non-compliance may lead to escalation or removal from sites.

This Policy applies to all sub-contractors and must be managed and enforced by all GML site management teams.

### **8.31 Site Segregation and Barriers**

As part of our commitment to maintaining a safe working environment, the company sets out the following policy regarding the planning, execution, and control of all site segregation and barrier systems used to protect operatives and the public during works or high-risk activities.

All segregation and barrier arrangements must be risk assessed and implemented using suitable methods and materials. Only trained and authorised personnel are permitted to install, adjust, or remove barriers. Operatives must follow manufacturer instructions, training received, and the relevant risk assessments and method

statements at all times.

All forms of barriers must be formally recorded by suitable means:

- Chapter 8 barriers, extendable barriers and metal chapter 8 barriers must be recorded via HS060 – Plant and Equipment Register.
- Heras fencing, edge protection barriers, trench/excavation barriers & traffic and vehicle impact barriers must be recorded via HS061 – Temporary Works Register. Additionally, a TWC (Temporary Works Conditions) / TWS (Temporary Works Supervisor) must be appointed by the company designated individual and must be subject to a 7-day inspection, recorded via HS071 – Temporary Works Inspection Record.

Wherever reasonably practicable, high-risk activities must be isolated from general work areas through physical segregation. This includes, but is not limited to:

- Live electrical testing.
- Working at height.
- Pressure testing of systems.

Group Metropolitan Ltd approved barriers:

- Chapter 8 barriers.
- Heras facing.
- Concrete barriers.
- Crash tested barriers rated Class A / 78 mph.
- Retractable barriers.
- Edge protection as per manufacturer's guidelines.

Group Metropolitan Ltd prohibited barriers:

- Incomplete edge protection (e.g., missing guardrails or gaps allowing materials, tools, or personnel to fall through).
- Unstable or poorly secured fencing (e.g., not anchored, easily moved, or blown over by wind).
- Barriers which fail to control traffic flow or provide clear segregation between plant/vehicular movement and pedestrian walkways.
- Uncontrolled access to exclusion zones (e.g., missing signage or lock-off systems allowing unauthorized entry).
- Failure to protect the public (e.g., site boundaries not properly fenced, allowing public access, including children).
- Materials or tools falling outside the site boundary due to insufficient perimeter barriers.
- Damaged or poorly maintained barriers (e.g., broken panels, missing fixings, or barriers left open).
- Improvised barriers (e.g., tape or rope used instead of compliment systems) unless specifically requested by the client, information stating this request must be shared with the HSEQ department for auditorial purposes.

Segregation must be established prior to commencement of these activities and maintained throughout their duration. Failure to implement appropriate segregation and barriers constitutes a breach of site safety protocols.

In accordance with the **Health and Safety at Work Act 1974**, the **Construction (Design and Management) Regulations 2015 (CDM)**, the **Workplace (Health, Safety and Welfare) Regulations 1992**, the **Provision and Use of Work Equipment Regulations 1998 (PUWER)**, the **Work at Height Regulations 2005**, the **Management of Health and Safety at Work Regulations 1999**, and **Chapter 8 of the Traffic Signs Manual (DfT)**, the company has a legal duty to ensure that all segregation and barrier systems are:

- Suitable for intended use.
- Safe for use, maintained in a secure condition, and inspected regularly.
- Installed and managed only by individuals who have received adequate information, instruction, and training.

Users must conduct visual checks of barriers and segregation systems before each use, looking for signs of damage, instability, or missing components. This includes checking fixings, supports, signage, and access controls, damaged or unsafe systems must not be used under any circumstances.

Where work activities are shorter than five working days (i.e. 'small works'), any segregation or barrier systems used during that period must still be inspected prior to use. These inspections must be documented and carried out by a competent person. Any defects or issues identified must be reported immediately, and the system must be taken out of service until repaired or replaced.

### **8.32 Storage of Materials**

The company is committed to ensuring the safe use, handling, and storage of materials in line with the Health and Safety at Work etc. Act 1974, the Management of Health and Safety at Work Regulations 1999, Manual handling operations regulations 1992.

#### **Requirements of storage:**

- Designated storage areas must be formally arranged prior to works commencing. Storage provisions must be appropriate to the scale and nature of the project.
- Materials must only be stored in designated areas approved by the senior management team on site and defined within our CDM demise.
- Access routes, emergency egress routes, emergency equipment, and escape paths must always remain unobstructed at all times.
- Materials must not be stored in any area not intended or approved for storage.
- Bulky items or large quantities of materials must be secured using suitable ratchet straps appropriate for the weight of the load.

#### **Stacking of materials:**

- Materials must be adequately stacked on mobile racking or push trolleys.
- Heavy items must be stored on lower levels; lighter items may be stored above.
- Pallets must be in good condition and not overloaded.
- Items must not be stacked higher than the manufacturer's recommendations or beyond its safe manual handling limits.

#### **Fire safety:**

All materials must be stored in a manner that does not obstruct fire call points, extinguishers, alarms, sprinkler systems, or any other emergency equipment. Combustible materials must be kept away from ignition sources, and waste must be removed regularly to prevent accumulation. Storage practices must ensure that fire safety systems always remain fully accessible operational.

#### **Deliveries and storage:**

All deliveries must be coordinated with the designated individual to ensure that adequate and appropriate storage space is available upon arrival. Any temporary storage established on site shall adhere to the same safety, organisational, and compliance standards required in permanent storage areas. Materials must not remain in loading or delivery zones longer than operationally necessary, and all items are to be secured and stored appropriately until transferred to their designated locations.

## 9.0 Planning and Consultation Arrangements

### 9.1 Construction, Design & Management

Group Metropolitan Ltd recognises that they may be involved in works which fall within the scope of the Construction (Design and Management) regulations (CDM) 2015 and that failure to meet the requirements of these regulations may result in injuries to persons involved with the construction project. The recognition, however, is not an acceptance, and it is the expressed intention of Group Metropolitan Ltd to take all reasonably practicable steps to ensure that each member of staff and others affected by its undertakings are not exposed to risks that may lead to incidents that may result in injury or ill health. Group Metropolitan Ltd is committed to working towards ensuring a safe, healthy and welfare orientated environment. Group Metropolitan Ltd will therefore take all steps necessary to fulfil this responsibility.

#### Principal Designer

A Principal Designer is a designer who is an organisation or individual (on smaller projects) appointed by the Client to take control of the pre-construction phase of any project involving more than one contractor.

Principal designers have an important role in influencing how risks to health and safety are managed throughout a project. Design decisions made during the pre-construction phase have a significant influence in ensuring the project is delivered in a way that secures the health and safety of everyone affected by the work.

As the Principal Designer, Group Metropolitan Ltd will:

- Plan, manage, monitor and coordinate health and safety in the pre-construction phase. In doing so they shall take account of relevant information (such as an existing health and safety file) that might affect design work carried out both before and after the construction phase has started.
- Help and advise the client in bringing together pre-construction information and provide the information Designers and Contractors need to carry out their duties.
- Work with any other designers on the project to eliminate foreseeable health and safety risks to anyone affected by the work and, where that is possible, take steps to reduce or control those risks.
- Ensure that everyone involved in the pre-construction phase communicates and cooperates, coordinating their work wherever required.
- Liaise with the principal contractor, keeping them informed of any risks that need to be controlled during the construction phase.

#### Principal Contractor

As the Principal Contractor, Group Metropolitan Ltd will:

- Plan, manage, monitor and coordinate the entire construction phase.
- Take account of the health and safety risks to everyone affected by the work (including members of the public), in planning and managing the measures needed to control them.
- Liaise with the Client and Principal Designer for the duration of the project to ensure that all risks are effectively managed.
- Prepare a written construction phase plan PDF before the construction phase begins. Implement, and then regularly review and revise it to make sure it remains fit for purpose.
- Have ongoing arrangements in place for managing health and safety throughout the construction phase.
- Consult and engage with workers about their health, safety and welfare.
- Ensure suitable welfare facilities are provided from the start and maintained throughout the

construction phase.

- Check that anyone they appoint has the skills, knowledge, experience and, where relevant, the organisational capability to carry out their work safely and without risk to health.
- Ensure workers have site-specific inductions, and any further information and training they need.
- Take steps to prevent unauthorised access to sites.
- Liaise with the Principal Designer to share any information relevant to the planning, management, monitoring and coordination of the pre-construction phase.

### **Contractor**

A Contractor is anyone who directly employs or engages construction workers or manages construction work. Contractors include sub-contractors, any individual self-employed worker or business that carries out, manages or controls construction work. They must have the skills, knowledge, experience and, where relevant, the organisational capability to carry out the work safely and without risk to health.

Contractors and the workers under their control are at risk of injury and ill health from construction work. Contractors therefore have an important role in planning, managing and monitoring their work to ensure any risks are controlled.

As the Contractor, Group Metropolitan Ltd will:

- Make sure the client is aware of the client duties under CDM 2015 before any work starts.
- Plan, manage and monitor all work carried out by themselves and their workers, taking into account the risks to anyone who might be affected by it (including members of the public) and the measures needed to protect them.
- Check that all workers they employ or appoint have the skills, knowledge, training and experience to carry out the work, or are in the process of obtaining them.
- Make sure that all workers under their control have a suitable, site-specific induction, unless this has already been provided by the Principal Contractor.
- Provide appropriate supervision, information and instructions to workers under their control.
- Ensure they do not start work on site unless reasonable steps have been taken to prevent unauthorised access.
- Ensure suitable welfare facilities are provided from the start for workers under their control and maintain them throughout the work.

In addition to the above responsibilities, contractors working on projects involving more than one contractor must:

- Coordinate their work with the work of others in the project team.
- Comply with directions given by the Principal Designer or Principal Contractor.
- Comply with parts of the Construction Phase Plan relevant to their work.

## **9.2 Project Health & Safety Plans**

Before Group Metropolitan Ltd start work on any site/project (and they are not the Principal Contractor as detailed within the Construction, Design and Management Regulations), they will prepare a Project Health and Safety Plan.

The Project Health and Safety Plan will be completed by the relevant Project Manager, who will ensure that all relevant persons and/or parties are made aware of the content and requirements of the plan.

## **9.3 Procurement**

Persons responsible for the process of the procurement of items shall ensure that:

- Any item of plant, equipment or goods whether purchased or hired, complies with the relevant legislation, standards and safety instructions on the correct use of plant etc. accompanies the goods purchased or hired.
- Relevant manufacturers' Health and Safety Information is to be supplied with any product purchased or hired. Relevant information shall include the material safety data sheets that are applicable under the Control of Substances Hazardous to Health Regulations.

#### **9.4 Health, Safety and Welfare Grievances including Consultation**

Joint consultation will be held between management and employees, including any appointed safety representatives, to resolve any problems which may arise.

Information will be provided to employees on subjects relevant to any consultation that they will be involved with such as the planning of health and safety training; and risk and hazards involved during the course of their work.

To resolve problems both parties, if necessary, will jointly seek expert impartial advice.

Employees who feel that problems are not being satisfactorily resolved by line management should highlight such concerns through the normal lines of communications however this does not affect employees' rights to contact the Health and Safety Executive independently.

Consultation will be undertaken if a decision is to be made involving work equipment, processes or organisation that could affect the health and safety of employees.

Information will be provided, and a chance will be given to the employees to express their views on the subject. These will all be taken into account before a decision is reached.

#### **9.5 Concern With Regard to Health and Safety Issues**

If any Group Metropolitan Ltd employee or sub-contractor has any concern with regard to their health and safety, or that of others, they should inform their manager / supervisor immediately (or as soon as it is safe to do so, dependent upon their circumstances) and if he or she is not available, then they shall report to an alternative person in authority.

### **10.0 Health Related Arrangements**

#### **10.1 Health Surveillance**

The purpose of health surveillance is to provide appropriate health surveillance for employees, based on assessment of the potential risk of harm through work activity and to provide employees with general advice on work related health matters. These briefings will be undertaken in confidence via a helpline service provided by Group Metropolitan Ltd.

Employees can also discuss occupational health issues with their line manager. These can be undertaken during a performance appraisal or as a standalone meeting.

Group Metropolitan Ltd will arrange for an Occupational Health Service Provider to procure relevant services on an 'as needed basis'. These will be provided should any circumstances arise or are brought to the attention of Group Metropolitan Ltd that require specialist medical advice or consultation.

Also, all employees will be encouraged to attend and cooperate with health surveillance briefings as requested by Group Metropolitan Ltd and to inform Group Metropolitan Ltd of any medical condition that may affect his or her potential to complete work safely. Or of any condition which they suspect may have been caused by work activities. As health surveillance has been designed to meet relevant statutory requirements, cooperation with this policy is required. Refusals to attend the briefings previously noted by an employee will be investigated sensitively; however, unreasonable refusal to cooperate may result in disciplinary action. Individual employees' reasons for not attending, e.g. religious or other personal factors, will be fully taken into account.

Records of health surveillance meetings between an employee and his/her line manager will be recorded on a Health Surveillance Record and the Health Surveillance Register.

## 10.2 Drugs and Alcohol

Group Metropolitan Ltd is committed to providing a safe and healthy working environment for all employees, contractors, and visitors. The use of illegal drugs, misuse of legal drugs or other substances and the abuse of alcohol present serious risks to the workplace in that they are known to impair performance and increase the likelihood of accidents. Group Metropolitan Ltd will (at its own discretion) undertake random testing of its employees and/or sub-contractors, Group Metropolitan Ltd will also support random testing undertaken by its clients.

For the purpose of this policy, unlawful drugs are those substances detailed in the Misuse of Drugs Act 1971 for which no prescription has been obtained.

The consumption of alcoholic beverages prior to commencing work (so that the employee can be reasonably regarded to be under the influence of alcohol) or during working hours (including on-site work) is prohibited.

The Company regards any breach of this rule to be a disciplinary matter that may result in formal disciplinary action, including summary dismissal for acts of Gross Misconduct.

Any employee who is medically prescribed drugs, which may affect their safety and efficiency, should seek advice from their GP regarding their fitness to carry out normal duties.

The Company prohibits the unlawful use, possession, sale, manufacture, and distribution of controlled substances as detailed in the Misuse of Drugs Act. Any employee who is convicted of an alcohol or drug related crime should report this, along with written details, to Group Metropolitan Ltd at the earliest opportunity. Group Metropolitan Ltd regards any breach of this rule to be a disciplinary matter that may result in formal disciplinary action, including summary dismissal for acts of Gross Misconduct.

## 10.3 Smoking

Smoking is not allowed within the Group Metropolitan Ltd building, signage as required by current legislation will be erected accordingly. Areas where smoking is permitted will be communicated to employees at their induction.

## 10.4 Stress at Work

Stress is identified as occurring when there is an imbalance between the demands of an individual and their resources available to meet them. This imbalance can appear to the individual as a loss of control on how they conduct their life.

Stress is a reaction by individuals to pressure both external and self-imposed, which results in physiological changes. These changes can make people feel exhilarated when things are going well or deflated when they are not. Stress is a necessary part of normal life enabling people to accomplish their goals. At optimal stress levels the individual thrives and maximises performance. Once stress becomes excessive, the person becomes distressed which will affect how they perform. If stress is experienced over a longer period the physiological changes can cause changes to a person's personality and habits, leading to poor working performance and also potentially changes in lifestyle. The ultimate results can harm the individual and ultimately incur financial costs to the organisation.

Group Metropolitan Ltd shall always ensure that the problem of stress is tackled at its source and not dismissed. This shall be achieved by removing or reducing the elements which cause stress. These would have been identified from interviews with staff and specific stress risk assessments carried out e.g. excessive workloads and limited physical and/or human resources could lead to excessive working hours. Possible solutions might involve reorganisation of tasks, increased resources, better training etc. Bullying or overbearing management styles may require disciplinary action to resolve them.

## 10.5 Dermatitis

Group Metropolitan Ltd understands that dermatitis within the workplace is a risk that shall be controlled. To assist in the prevention of dermatitis, Group Metropolitan Ltd will implement the following;

- Protect the skin through washing and PPE.

- Check for early signs of dermatitis.

Group Metropolitan Ltd understand many everyday substances can cause dermatitis and complete avoidance of those substances is not reasonably practicable. Group Metropolitan Ltd shall take all reasonable steps to eliminate contact with materials that cause dermatitis by changing the task or process.

## 10.6 Respiratory Sensitisers

Group Metropolitan Ltd recognises that breathing in substances called respiratory sensitisers at work can lead to occupational asthma. The documentation listed below is to be used to assist in the management of respiratory sensitisers and control the risks of occupational asthma.

- COSHH Assessment Record.
- Task/Activity Based Risk Assessment.
- Health Surveillance Record.
- Health Surveillance Register.

## 11.0 Specific Workplace Arrangements

### 11.1 Young and Inexperienced Workers

Group Metropolitan Ltd does not allow anyone under the age of 16 to complete any work considered to be under the construction umbrella. They may be allowed on to a work site when under strict supervision and never off the designated safe walkways. They may complete low risk administrative works as a part of work experience.

Anyone under 14 is not allowed within any Group Metropolitan Ltd workspace.

No persons between 16 and 18 years of age will be permitted onto any Group Metropolitan Ltd office or site without the following;

- Written permission from the person's parent or guardian.
- Written permission from Group Metropolitan Ltd.
- Written permission from the client (for site work).
- Completion of a specific risk assessment for the activities that are to be undertaken by the young person.
- Young Person's Risk Assessment.
- Task Specific Risk Assessments.

Anyone starting work for the first time at any age will also require the completion of a specific risk assessment to ensure that their lack of industry experience does not expose them to additional risk.

### 11.2 New & Expectant Mothers

There are specific requirements to take particular account of risks to a worker who is pregnant, who has given birth within the previous six months, or who is breastfeeding.

Female employees of childbearing capacity should be informed of any potential risks identified if they are or could be pregnant or breastfeeding. An explanation should be made of the steps that will be taken to ensure that new and expectant mothers are not exposed to the risks that could cause them harm.

Risks to new and expectant mothers include:

- Manual handling of loads; pregnant workers are especially at risk from manual handling injury. There can also be risks for those who have recently given birth, e.g., after a caesarean section.
- Movements, postures and fatigue; fatigue from standing and other physical work may put pregnant workers at risk. They may also experience problems working at height, e.g., stepladders, or in tightly

fitted workspaces or with workstations which do not adjust sufficiently to take account of increased abdominal size.

- Work with certain substances.

Identified risks shall be recorded and assessed using a New and Expectant Mother Risk Assessment.

### **11.3 Display Screen Equipment (DSE)**

Users of DSE shall review their workstation against parameters detailed on a Display Screen Equipment User Assessment to achieve an ideal working situation and report any non-conformity to their line manager for corrective actions where possible.

Those who do not complete all their work from a Group Metropolitan controlled work area are required to complete a Display Screen Equipment User Assessment for any regular workstation they use. This could be at a client site or from their own home. In this case Group Metropolitan Ltd will do everything reasonably practicable to ensure these workstations do not cause injury but are limited outside of their own controlled work areas.

If work areas outside of our control cannot be made safe, the employee shall be advised to complete work from a Group Metropolitan Ltd office.

DSE assessments shall be periodically reviewed, usually within a 12-month period, however there are circumstances where an assessment may need to be reviewed earlier, i.e. employee moves to another workstation, receives new DSE equipment or workstation furniture. A review will also be required should the employee's personal characteristics change in any way.

Adequate health and safety training is to be provided. The objective of the training will be to reduce the risk of physical (musculoskeletal) problems, visual fatigue and mental stress. The training should include;

- A simple explanation of the causes and risks of harm whilst using DSE equipment and workstations.
- The desirability of comfortable posture.
- Correct use of adjustment mechanisms on equipment, particularly furniture.
- Arrangement of workstation components to facilitate good posture.
- The need for regular cleaning of screens and other equipment, and inspections to identify defects.
- The need to take advantage of breaks and changes of activity.

All employees should be issued with or have access to a "You and Your Workstation" Guide.

### **11.4 Permits to Work**

Where works are being undertaken by Group Metropolitan Ltd on site under the control of others, any permits to work would normally be issued by the client or the principal contractor.

However, where Group Metropolitan Ltd need to implement permit to work controls e.g. within their own premises, then the following permits will be issued;

- Access Permit.
- Hot Work Permit.
- Electrical Work Permit.

As standard, permits to work are expected to be completed via the Breadcrumb platform.

### **11.5 Lone & Out of Hours Working**

There is no prohibition for working alone but there are duties under the Health and Safety at Work act and the Management of Health and Safety at Work Regulations, namely, to provide a safe system of work and to carry out a risk assessment where there is a foreseeable significant risk.

Whilst it is noted that lone working is not a situation that affects all staff, it is a possibility for some. To ensure risks and hazards associated with the lone working task have been identified, a risk assessment shall be carried out prior to the activity taking place.

## 11.6 Work Experience

Should Group Metropolitan Ltd accept delegates for work experience purposes, completion of the following shall take place prior to the delegates being exposed to any working activities or environment.

- Employee Induction Record.
- Site Induction.
- Work Experience Checklist.
- Task/Activity Specific Risk Assessment.
- Health Surveillance Register.

## 12.0 Non-Routine Work Standard and Procedures

### Definition:

Non-routine work is any work that is considered not part of the normal work process or activities that an employee performs. This work is not normally conducted during day-to-day operations and may not be referenced specifically with safe work or safe operating procedure.

### Scope:

All employees who are expected to do a task that is not routine to them are expected to follow these standards and procedures.

### Standard:

In recognition and support of the Health and Safety Policy, Group Metropolitan Ltd has developed safe operating/work procedures to provide operators and workers with the information required to perform their jobs safely with an awareness of potential hazards and safeguards that are in place for their protection. Construction can be an ever-changing environment and by its very nature, there may be occasional requirements for tasks or work that are not normally performed. In these cases, to ensure that our workers have the training, instruction and PPE required to perform the job. Group Metropolitan Ltd has developed Non-Routine Work Procedures to meet those requirements. Any employee who is asked to perform a non-routine task and any supervisor authorising the worker to perform a non-routine task is expected to complete the documented procedures below.

### Step by step process:

1. Supervisor and workforce to review the task, to consider what aspects may be considered Non-Routine work.
2. Document the nature of the non-routine work.
3. Conduct pre-work meetings to address potential hazards (Risk Assessment) and include Health and Safety Rep(s).
4. Implement Controls (i.e. PPE, Guards, Safe Operating Procedures if required).
5. Document hazards, Controls and Risk Assessments.
6. Determine when the non-routine work will start and when it will end.
7. If SOPs have been developed and written, post at site and communicate process directly to workers involved.
8. If emergency preparedness is required, arrange for Emergency Response to be on location (i.e. paramedics, fire).

9. If hygiene testing is required, arrange for this prior to work start (i.e. Air Sampling).
10. Inspect PPE to ensure effectiveness (i.e. appropriate respirator, fall protection, two-way communication etc).
11. If non-routine work is performed at the request of a General Contractor, then no non-routine work will commence until Contractor provides written instructions and training and safe work procedures for this non-routine work and all applicable PPE and emergency preparedness elements.
12. Have Supervisor ensure that all workers have been trained on process and that all necessary PPE are in place.
13. Post the non-routine work notice on site at job start and Supervisor must remove upon completion.

Roles	Responsibility/Task	Non-Routine Work Consideration
Supervisor/Project Manager	Meeting	Consider what aspects of this project if any may require or result in non-routine work being performed.
Supervisor/Project Manager	Documentation	Document clearly the nature of the non-routine work.
Surveyor, Supervisor and/or Project Manager, Health and Safety Rep	Meeting	Conduct a pre-work meeting to discuss what routine work is required and conduct a risk assessment to measure the associated risks.
Supervisor	Document	Based on previous meeting, document the hazards associated with the work and list and implement controls – These may include PPE, guarding and defined Safe Operating Procedures
Supervisor/Project Manager	Document	If Safe Operating Procedures are required, ensure that no work is completed until these RAMS are written. These must be written and approved by either the Site Manager or Project Manager if deemed to be competent persons regarding the non-routine work – If in doubt the opinion of a professional (i.e. engineer, inspector or occupational hygienist) must be obtained.
Site Manager/Supervisor	Control implementation	In addition to the RAMS to be written, ensure that all other controls are available during the period of non-routine work (i.e. PPE, guarding, emergency response personnel, two-way communication etc.).
Site Manager/Project Manager	Consultation	If hygiene testing such as air sampling is required, it is the Site Manager/Project Manager's responsibility to arrange - The Health and Safety representative can provide assistance in this regard.
Site Manager/Supervisor	Contractor Requests	If work is to be done at request of a Site Manager / Supervisor then obtain all SOPs from them, in addition to ensuring that the Site Manager / Supervisor provides instruction and training to all affected workers.
Site Manager/Supervisor	Worker Awareness/training	Conduct toolbox talk on nature of work, review written safety procedures and remind workers of their right to refuse unsafe work- all workers must be trained prior to commencing work.
Site Manager/Supervisor	Inspection	Inspect PPE for effectiveness and to ensure it meets requirements (i.e. respirator for air quality issues) If specific training is required (i.e. fall restraint/travel) then verification that

		the worker has had training must be documented.
Health and Safety Representative	Participation	Health and Safety Rep is to participate in pre-work safety meeting and should be willing to contribute in any way to the development of safe work procedures.

## 13.0 General Arrangements

### 13.1 Temporary Workers & Sub-Contractors

Group Metropolitan Ltd recognises its duties to persons other than employees under the requirements of Sections 3 and 4 of the Health and Safety at Work etc. Act 1974 and its obligations to fixed term contractors and temporary workers under the Management of Health and Safety at Work Regulations 1999. All contractors and temporary workers will therefore be provided with all necessary information regarding risks to their health and safety whilst on Group Metropolitan Ltd premises or site. Suitability of contractors in terms of health and safety will be a prime consideration prior to the awarding of contracts.

This will involve an assessment of contractor competency in safe management as far as can be reasonably ascertained from information submitted by the contractor using a Sub-Contractor Evaluation.

RAMS from contractors and sub-contractors are expected to be uploaded to the Breadcrumb platform. The Group Metropolitan Ltd site management team will then review the RAMS on the Breadcrumb platform.

When evaluating Risk Assessments and Method Statements submitted by Sub-Contractors to determine whether they are suitable and sufficient, the Risk Assessment & Method Statement Evaluation should be used.

Once approved RAMS have been evaluated, they must be signed off on the Breadcrumb platform by all relevant parties.

Sub-Contractors are subject to the same conditions as the company and will comply with all relevant statutory requirements, codes of practice and guidance notes.

All contractors will be expected to manage risks to the health and safety of Group Metropolitan Ltd' employees, other contractors and members of the public exposed to working activities carried out for the company by the contractor.

All plant, equipment, substances, materials and working practices used and/or adopted by sub-contractors shall be safe and used in a manner which meets the requirements of all current legislation and best practice. All sub-contractors and temporary workers will be familiarised with local fire and emergency procedures by persons responsible for the contractor or temporary worker.

### 13.2 Visitors (Site)

Visitors to site shall be briefed on the following:

- Site Fire and Evacuation Procedure.
- Site Rules.
- Location of Welfare Facilities.
- Accident & Incident Reporting Procedure.
- First Aid Arrangements.
- Restricted Areas.
- The need to remain with his/her host at all times.

### 13.3 Visitors (Office)

It is important to provide the relevant information to visitors. The contents of the information will depend on the

circumstances (e.g. regular and accompanied visitors) at the particular premises, but is likely to include:

All employees who are expected to do a task that is not routine to them are expected to follow these standards and procedures.

- Directions.
- In-house rules include signing in, smoking, parking, etc.
- Restricted areas and their identification.
- Procedure for obtaining assistance (it is to be remembered that the provision of first aid to visitors is not mandatory) and reporting problems and defects.
- Means of recognising the emergency alarms.
- First Aid Arrangements.
- Welfare Facilities.
- Accident & Incident Reporting Procedure.

### **13.4 Non-English-Speaking Personnel**

All Group Metropolitan Ltd documentation will be written and produced in English, therefore all persons undertaking works for Group Metropolitan Ltd, shall have an acceptable level of ability to read and understand health and safety documentation and information. However, Group Metropolitan Ltd will assist all relevant persons, where it is possible and reasonably practicable to do so.

This assistance will be through the use of others who may be available locally, to act as an interpreter. Such persons shall also be able understand verbal instructions, which will be given to them in English.

Managers and Supervisors shall clarify and confirm and verbal information given, to ensure that it is understood. As previously noted, assistance will be provided by Group Metropolitan Ltd, again where it is possible and reasonably practicable to do so.

### **13.5 Mobile Phones & Driving**

Group Metropolitan Ltd is committed to reducing the risks our employees face and create when driving for work. We expect that all employees play their part, whether they use a company vehicle, their own or a hire vehicle.

**Managing Director and Directors shall ensure:**

- They lead by personal example.
- They do not expect staff to answer calls whilst driving.
- That employees understand their responsibilities not to use hand-held mobile phones while driving.
- That employees switch phones to voicemail, or switch them off while driving, or ask a passenger to use the phone.
- That employees plan their journeys to include rest stops which will also provide the opportunity to check messages and return calls.
- That work practice does not pressurize staff to use a mobile phone while driving.

**Employees who drive for work shall:**

- Never use a hand-held mobile phone while driving.
- Plan journeys so they include rest stops when messages can be checked, and calls returned.

- Ensure their phone is switched off and can take messages while they are driving, or allow a passenger to use the phone, unless a suitable hands-free device has been fitted.
- Ensure that if using a 'hands free kit' with their mobile phone, that they still do not dial numbers from their phone, only use this equipment to answer incoming calls.

### **13.6 Prevention of Illegal Working**

Under the terms of the Immigration, Asylum & Nationality Act 2006, all employers in the UK are required to make basic checks on everyone they intend to employ. By checking and copying certain original documents belonging to the potential employee, Group Metropolitan Ltd can ensure a statutory defense against conviction for employing an illegal worker.

Where a prospective employee does not have the right to work in the UK without Home Office permission, any offer of employment will be conditional on the receipt of a certificate of sponsorship.

These rules apply to any new employee, whether on salary, wages, fees, or any other form of payment and irrespective of the length or duration of the work.

Group Metropolitan Ltd shall obtain certain documentation from all individuals working for them, to ensure that all individuals are working in accordance with the Act. See Preventing Illegal Working Checklist.

### **13.7 Document Changes**

Changes required to any documentation contained within the Group Metropolitan Ltd Health & Safety Policy shall be done in a controlled manner. No new documents are to be created, or any changes are made to existing documentation.

If the need for a new document to be created is identified, or changes required to an existing document, then this requirement is to be made by using the Document Change Request Form.

### **14.0 Breadcrumb**

The Breadcrumb platform is a mobile app and web portal designed for construction companies to streamline and automate site safety workflows. It is an intuitive and comprehensive solution that digitises compliance administration in all construction works. This mobile-first solution enables the communication of critical site documentation, live statistics and records between everyone on every project.

This essentially means that all day-to-day H&S documentation will be carried out digitally on the app, as opposed to a paper-based system.

This includes:

- Inductions.
- Upload of competencies (by sub-contractor operatives).
- Signing of RAMS.
- RAMS review (sub-contractor RAMS).
- Safe starts.
- Inspection forms.
- Check sheets.
- Permits.
- Toolbox talks.

The Breadcrumb platform also provides integration with both Procore and HandsHQ.

GML projects will be expected to be active on Breadcrumb if they meet the following criteria:

- GML is the Principal Contractor for the project.
- The project is set up on Procore.
- The duration of the project is above five working days.

If a project does not meet the above criteria, it will not be expected to roll out Breadcrumb.

All new projects where GML are the P.C. are to be run through Breadcrumb as standard.