

JCW Group

Health and Safety Management System

Part 1 – Group Health & Safety Policy

JCW Floor Screeding Ltd JCW Acoustic Flooring Ltd JCW Acoustic Supplies Limited Unit 32 - 34 Waters Meeting Development Britannia Way Bolton BL2 2HH

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Preface

Introduction to the Health and Safety Management System

The Health and Safety Management System for JCW Group includes the activities of JCW Floor Screeding Ltd, JCW Acoustic Flooring Limited and JCW Acoustic Supplies Limited

The Health and Safety Management System for JCW Group comprises of a number of separate but integrated documents.

The Health and Safety Management System has been split into 5 parts:

- Part 1 Group Health and Safety Policy
- Part 2 Head Office Policies and Arrangements
- Part 3 Floor Screeding Installations Policies and Arrangements
- Part 4 Acoustic Floor Installations Policies and Arrangements
- Part 5 Acoustic Supplies including Manufacture and Warehousing Policies and Arrangements

The Health and Safety Management System has been written to comply with the principles of BS OHSAS 18001:2007

The Health and Safety Management System has been written to fully comply with the:-

- The Health & Safety at Work etc. Act 1974
- The Management of Health & Safety at Work Regulations 1999
- The Corporate Manslaughter & Corporate Homicide Act 2007
- The Health & Safety (Consultation with Employees) Regulations 1996
- The Safety Representatives & Safety Committees Regulations 1977

Policy Statement

Policy Statement for JCW Floor Screeding Ltd, JCW Acoustic Flooring Limited and JCW Acoustic Supplies Limited

It is this Company's intention that its work will be carried out in accordance with the relevant statutory provisions and all reasonably practicable measures taken to avoid risks to its employees or others who may be affected by our undertaking.

We aim to provide and maintain safe and healthy working conditions, equipment and systems of work for all our employees, and to provide such information, training and supervision as they need for this purpose. We also accept our responsibility for the health and safety of other people who may be affected by our activities.

Our policy is:-

- to provide adequate control of the risks arising from our work activities
- to consult with our employees on matters affecting their health and safety
- to provide and maintain safe plant and equipment
- to ensure safe handling and use of substances
- to provide information, instruction and supervision for employees
- to ensure all employees are competent to do their tasks and are adequately trained
- to prevent accidents and cases of work-related ill health
- to maintain safe and healthy working conditions

The allocation of duties for safety matters and the particular arrangements which we have made to implement the policy are set out within this document and within its sister documents and apply to all employees, self-employed persons and visitors working on-site for JCW Group Limited and within the premises of JCW Group Limited.

The policy will be kept up to date, particularly as the business changes in nature and size.

To ensure this, the policy and the way in which it has operated will be reviewed on a regular basis.

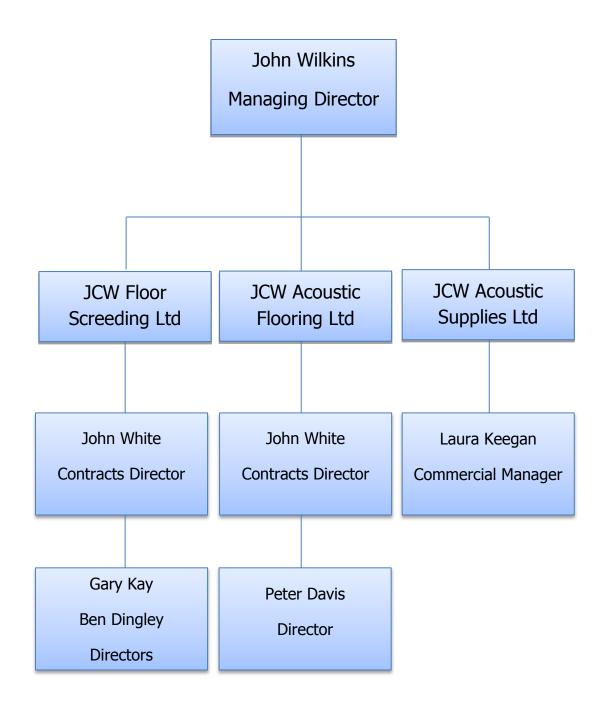
Signed

Date January 2014

JCW Group Managing Director JCW Floor Screeding Limited JCW Acoustic Flooring Limited JCW Acoustic Supplies Limited

Organisation & Responsibilities

Group Organisation Chart



Management Responsibilities

The overall responsibility for health and safety within the organisation is that of JCW Group, assisted by the Directors, Health and Safety Manager/Administrator, Managers and Supervisors, who are responsible for the day-today implementation of the policy.

This responsibility includes organising, co-ordinating, monitoring and controlling all aspects of Health and Safety. Other specific responsibilities include:-

- Ensuring that all necessary risk assessments are carried out and the findings communicated to those employees and others who may be affected. Also the completion of any remedial actions required to be made as identified by the assessment.
- The identification of any safety training needs and the arrangements for these to be carried out.
- The provision of induction briefings for all new employees.
- The provision of an accident book and co-ordination of any accident and incident investigations together with the compilation of all reports necessary under the RIDDOR Regulations.
- The communication of all health and safety information applicable prior to the commencement of any work.
- The carrying out of workplace inspections to ensure that safe working practices are being complied with, and that employees maintain the areas in which they are working in a safe state.
- Arranging for the undertaking of all statutory examinations, inspections and tests and the recording of these.
- Arrange for the provision of a trained First Aider to be available at all sites where employees of JCW Group are working and the provision of suitable first aid boxes.
- The provision and recording of periodic tests and inspections of all portable or transportable electrical equipment, by a competent person.

Employees' Responsibilities

All Employees while at work are required to:-

- Take reasonable care for their own health and safety and of other persons who may be affected by their acts or omissions.
- Co-operate with their employer (or any other person) in enabling their compliance with the requirements and duties under placed on them by the relevant legislation.(From Health and Safety at Work Act, 1974)
- Familiarise themselves with the company Health and Safety Policy and the relevant rules relating to their specific job.
- Comply with the Company and client safety rules and legislation at all times.
- Use safety equipment, safety devices and protective clothing as appropriate and when required to do so. Report any defects in respect of these provisions.
- Report all accidents, dangerous occurrences, hazards and near miss events.
- Comply with any other measures in relation to their safety and welfare at work.

General Arrangements

Note:

Please note that comprehensive details and information regarding the specific practical implementation of these general arrangements can be obtained within the arrangements for each part of the company, and any further advice can be obtained from the Health and Safety Manager/Administrator

1. Risk Assessments

The process of Risk Assessment is undertaken to analyse the risks inherent within a particular operation, this would include the risks associated with the plant, the location, the product or substance and the work process. The assessment takes account of those who are actually doing the task, how frequently the task is undertaken, and others that may be affected by the task. Some Legislation requires assessments to be carried in specific areas i.e. COSHH, Display Screen Equipment and Manual Handling. The objective of all risk assessment is to eliminate significant risks and or establish safe systems of work that encompass the necessary risk control measures to reduce the exposure to the risk to as low as reasonably practicable. JCW Group has implemented a procedure for the process of risk assessment which includes the requirements of specific legislation. The assessments are regularly reviewed and updated as appropriate.

2. Safe Systems of Work

Through the arrangements implemented with the intent of this document JCW Group will provide, so far as is reasonably practicable, a working environment including the plant and equipment, working practices and substances for use at work, that is safe and without risks to health. The application of safe working practices will be routinely extended to all our sub-contractors, where the arrangements for managing these contractors will require the submission and review of risk assessments and detailed definition of the safe systems of work to be adopted. Observation of tasks will provide feedback on competence, clarity of task instructions, adequacy and safety of equipment, and use of the correct material in a safe way.

3. Planned Inspections

Inspections of the workplace and working practices help to reduce the potential for accidents. JCW Group has implemented a procedure to address the specific requirements of undertaking planned inspections. Outlining the areas and topics that should be covered, obviously different tasks and locations warrant different frequencies of inspection; our Managers have guidelines on inspection frequency however they will determine the most effective use of this safety management tool in relation to the specific factors of the actual task and location.

4. Training and Competency

JCW Group recognises the importance of competent people in enabling consistency and proficiency in the delivery of our service. The maintenance of knowledge to ensure work is undertaken in compliance with the standards for safety, quality and environmental management is a key element of the management system. Induction training is provided to new starters in addition to the information and instruction delivered in relation to specific sites or contracts. Temporary members of staff are provided with suitable and sufficient information in relation to their duties. Training needs analysis is undertaken for the members of the team and specific training is arranged and delivered as

appropriate. The records of training undertaken and of the competence of new starters and existing employees are recorded in the training database which is subject to audit.

5. Accident / Incident Reporting and Investigation

JCW Group requires the reporting of ALL Accident, Incident, Hazards and Near Misses events to the Health and Safety Manager/Administrator. In addition to the reporting process ALL events are subject to investigation, the extent and degree of this investigation is determined by the actual nature of the circumstances. All investigations lead by the Health and Safety Manager/Administrator will be documented in a standard report format and circulated to relevant managers. Analysis of the reported incidents will take place at suitable intervals; trends will be determined to enable adjustments to be made in the appropriate area of the management system. The recommendations made as a result of investigations will be subject to follow up action.

The following RIDDOR reportable incidents will be advised immediately to the HSE:-

- Accident resulting in death
- Accident resulting in major injury
- Work related diseases
- Dangerous occurrences
- Over Seven day injuries

The established procedure for RIDDOR reporting and Investigation is as follows:-

- Details of Incidents shall be reported by the Health and Safety Manager/Administrator to the Incident Contact Centre (ICC) using the F2508 form.
- Copy of F2508 received from ICC with covering letter
- Any errors or omissions corrected and advised to ICC
- Accident Book completed where appropriate (Details retained for at least 3 years)
- Details / circumstances analysed to determine:-
 - 1. The need for additional Safety Procedures
 - 2. The need for additional Safety Training
 - 3. The need for additional / improved PPE

6. Safety Meetings and Tool Box Talks

A structure of managers' meetings and safety committee meetings and has been implemented to provide forums for the discussion of safety related issues and updates on legislation or company policy. The designed structure of these meetings and the company culture is to encourage and enable the free flow of information. There is no limit on the frequency of these meetings.

Tool Box Talks enable the safety team to deliver short and to the point bulletins. Suggestions on Health and Safety related issues are again encouraged at these talks where a less formal approach often generates useful information.

7. Personal Protective Equipment

The requirement for using PPE will always be considered at the last resort control measure and never as the first option. Engineering controls, administrative and work practice controls will be thoroughly evaluated prior to considering the use of PPE. When PPE is issued the users will receive adequate information instruction and training in the use and maintenance of that PPE and the limitations to its use. The arrangements established for the procurement of PPE are subject to review as appropriate.

8. Emergency Preparedness

Planning for foreseeable emergency situations in order to mitigate their effects is an important part of the Health and Safety policy framework. The arrangements for such emergencies as fire and bomb threat will be determined for each working location by the site or contract manager/supervisor (this

will often involve the adoption of the Clients procedures). The action to be taken in the event of a fire or on suspecting a fire is included as a standard item within the induction process. Planning for system failure and or power failure where critical information may be affected is a consideration for the management to address. A strategy to maintain the integrity of that system or to 'back up' the information will be determined having given due consideration to the likelihood and severity of the event. Fire systems and fire-fighting equipment must be regularly inspected and tested. Necessary documentation must be maintained to meet the requirements of the Regulatory Reform (Fire Safety) Order 2005. Fire Areas/issues requiring corrective action will be dealt with promptly.

9. First Aid

Appropriate First Aid facilities are provided within the head office and in all company vehicles. Trained First Aid Assistance is provided commensurate with the requirements of the particular location taking into account the nature of the work undertaken at that location. The requirements regarding first aid arrangements and provisions are specifically addressed in a JCW Group procedure, which identifies responsibilities and provides guidance.

10. Plant and Equipment

JCW Group has put in place appropriate procedures to enable the control and maintenance of equipment, plant, and infrastructure so as to meet company standards and legislative requirements e.g. Electricity at work, PUWER etc., these arrangements include the strategy for preventative maintenance. Specific Contracts will have systems implemented to adequately address the requirements relating to the plant and equipment particular to that location and contract. JCW Group will, so far as is reasonably practicable, ensure that hired plant or equipment is safe for use and where appropriate will obtain test and examination certificates. Only those people that are competent to do so will be authorised to use such hired equipment.

11. Accommodation

The accommodation provided for members of the JCW Group team will, so far as is reasonably practicable, ensure the safety, welfare and working environmental conditions that are suitable for the tasks required to be performed or function the accommodation is designed for. Adequate arrangements will be put in place to protect people from the effects of passive smoking at work and for the provision of suitable rest facilities.

12. Control of Contractors

The proper selection and control when utilising the services of contractors, is essential in enabling the maintenance of a safe working environment and reducing the potential for accidental losses. The provision of the appropriate risk assessments and method statements are one element of this process. For all works involving the use of contracted services the relevant JCW Group Manager/Administrator is responsible for ensuring the competence of those people undertaking the work. All the arrangements regarding contractors will be subject to monitoring and audit activities

13. Hiring and Placement

JCW Group has put in place procedures to enable effective control over recruitment for either permanent or temporary personnel. The process is designed to identify the specific requirements of individual posts (including the technical skills and personal qualities) and consider these in the recruitment process. The Office Manager monitors all issues in relation to recruitment.

14. Management of Working Time

Suitable and adequate systems for the monitoring of hours worked have been established. Individual members of the team are advised about the provision of the statutory provision and agreements regarding working hours are filed on individual personnel records.

15. Drugs and Alcohol

Systems of 'Due Diligence' are implemented to ensure, so far as is reasonably practicable, employees do not report for, or carry out work whilst under the influence of alcohol and/or drugs. Where it is necessary formal medical screening arrangements can be put in place.

16. Communication and Publications

- Suitable publications are obtained on subscription to support the provision of up to date information provided to employees, clients and contractors.
- An electronic database of health and safety information is maintained to provide a comprehensive source of statutory information.
- Notice boards are utilised to display fundamental health and safety information.
- The Health and Safety Manager/Administrator maintains a library of safety information.
- Internal publications will advise personnel of changes to legislation and new or amendments to company policy.

All personnel will have access to the company policy and the related procedures and guidance information.

17. Construction and CDM Related Projects

The personnel involved in the various aspects of project work shall be appropriately competent to undertake that function.

18. Assistance and Advice

The Health and Safety Consultants – Comply at Work Ltd - provides a consultancy service to JCW Group. The master documents and electronic database of internal information to support the Health and Safety Policy and Management System are maintained by the Health and Safety Manager/Administrator.

19. Procurement

All goods and services will be obtained to meet the requirements of the applicable legislation COSHH, CHIP, CDM regulations etc.

20. Health and Safety Monitoring

The measurement of performance against the health and safety standards that have been established is an essential tool in the on-going development and enhancement of our Health and Safety management system. Safety tours, inspections, direct observation and audits are all elements of this process; these are proactive indicators which are used to gauge the effectiveness and application of safe systems of work and of the process of risk assessment etc. Reactive measures are also used such as accident reports, and the occurrence of other incidents such as near miss and ill health reports. The information is reviewed and trends analysed to determine where system deficiencies exist. Remedial actions arising from corrective action will be identified and appropriate measure taken.

21. Policy and Management Review

This policy will be subject to formal annual review in addition to amendment at interim periods. The arrangements outlined will be reviewed on an on-going basis. The performance of the health and safety management system general arrangements and the performance of individual elements, which will include the results of auditing, will form part of the overall management review.