



Health and Safety Policy Statement

Jenner (Contractors) Limited is committed to providing a work environment that is safe and healthy for all employees and those affected by our activities. Jenner (Contractors) Limited operations shall be carried out so as to ensure, so far as is reasonably practicable, that the Health, Safety or Conditions of any person or property will not be adversely affected.

The Board is actively committed to the provision of strong and active leadership in such matters, the engagement of the workforce in the promotion and achievement of safe and healthy conditions and the formal assessment and review of the Jenner (Contractors) Limited performance. The Board will provide adequate resources, information and training to ensure that the Management Teams can deliver the objectives set by the Board for continuous improvement throughout the business.

The requirements of the Health & Safety Policy are communicated to all employees and the involvement of all individuals within Jenner (Contractors) Limited in the management of health and safety is actively promoted through effective consultation and involvement.

The Health, Safety and Welfare of all employees and those who may be affected by our work is an integral part of our business performance. Compliance with legal requirements should be achieved at all times, and no breaches should be tolerated.

Health and safety is a key core value for all within Jenner. Jenner recognises health and safety is integral to its present and future success and requires the commitment, innovation and determination of all its Directors and Senior Managers to ensure the continual improvement of health and safety performance.

Health and safety is considered by Jenner to be an essential measure when determining effective management. It is, therefore, required that all Jenner Directors and Senior Managers actively engage to ensure health and safety management, performance and overall culture is a mainstream business deliverable.

The Health and Safety at Work etc Act 1974 and the supporting Regulations made under the Act place duties on employers to put into place effective safe systems of work, safe places of work and to proactively plan for health and safety. In particular, Section 37 of the Health and Safety at Work etc Act 1974 states that a company's officers which includes Directors, Managers or any other Officers can become liable for any breaches of duty which are imposed by the Act.

The Board shall review this policy, periodically taking action if necessary to ensure its effectiveness and compliance with changes in the nature of the Jenner (Contractors) Limited operations and structure, legislation, best practice and procedures.

Signed:

Nick Barnes
Construction Director

January 2023

PART 1 – ORGANISATIONAL RESPONSIBILITIES

1.1 The Board of Directors shall:

- 1.1.1 have collective overall responsibility for Health and Safety (H&S) matters;
- 1.1.2 ensure they receive adequate training to maintain their knowledge and understanding of current H&S duties;
- 1.1.3 identify and understand the significant risks created by Jenner changing and expanding activities in so far as these might adversely affect the safety and health of our workforce and others, and the environment;
- 1.1.4 support and assist the Managing Director and the Construction Director in their roles by providing strategic direction for the effective management of H&S responsibilities and review and endorse Jenner (Contractors) Limited H&S strategies;
- 1.1.5 ensure the development of H&S documentation based upon risk assessment that meets legal requirements and industry best practice, and is in accordance with Jenner H&S policy and its associated arrangements;
- 1.1.6 ensure that an Occupational Health Strategy is established which will include appropriate health surveillance, sickness absence management and rehabilitation and return to work arrangements;
- 1.1.7 take the lead in ensuring the effective communication across Jenner (Contractors) Limited of H&S duties and the benefits of good performance in this regard;
- 1.1.8 ensure that suitable resources and strategic direction to discharge Jenner H&S responsibilities is provided;
- 1.1.9 set the Jenner (Contractors) Limited objectives and review performance against them;
- 1.1.10 ensure arrangements are in place to assess and monitor the performance of Jenner suppliers and contractors/subcontractors;
- 1.1.11 review the overall performance and effectiveness of Jenner H&S management system, and ensure arrangements are made for any significant weaknesses to be addressed;
- 1.1.12 ensure staff and their representatives are involved and consulted on relevant H&S matters and ensure that their views are considered;
- 1.1.13 review and amend this policy as appropriate.

1.2 Managers shall:

- 1.2.1 comply with at all times, and promote where possible, Jenner H&S management system and associated documentation;
- 1.2.2 ensure work-related hazards are identified and suitable and sufficient risk assessments are undertaken to eliminate or, where that is not reasonably practicable, reduce those risks;
- 1.2.3 ensure that the Occupational Health Strategy is implemented through active management of health, including health surveillance and sickness absence management;

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- 1.2.4 develop where applicable project/location specific procedures and safe working practices in line with legislative requirements, Jenner documentation and local risk assessments;
- 1.2.5 ensure that all their staff, contractors/sub-contractors, visitors, etc. have access to adequate welfare facilities;
- 1.2.6 ensure that they and all their staff have an adequate level of competence, supervision, instruction and information to complete their work tasks safely, this includes access to Jenner H&S documentation;
- 1.2.7 ensure that all local H&S systems of work are appropriately maintained;
- 1.2.8 report and investigate H&S incidents as necessary;
- 1.2.9 ensure that work locations are regularly inspected and audited and that any failings identified are remedied without delay;
- 1.2.10 ensure the proper selection and adequate management of suppliers and contractors/subcontractors.

1.3 Site Managers, Foremen and Supervisors shall:

- 1.3.1 organise all works to maintain a working environment that is safe and without risk to health in accordance with Jenner H&S management system;
- 1.3.2 maintain means of access to and egress from places of work that are safe and without risk to health;
- 1.3.3 arrange for work to be undertaken to avoid as far as is reasonably practicable, unnecessary ill-health effects from substances and/or activities;
- 1.3.4 ensure, so far as is reasonably practicable, the proper use of welfare facilities;
- 1.3.5 provide comprehensive instruction to all employees and contractors/subcontractors on responsibilities for H&S working methods and ensure that they take all reasonably practicable steps to prevent unsafe conditions or unsafe acts from occurring;
- 1.3.6 provide information to promote healthy and safe working methods and prevent damage to the environment, this includes Jenner H&S documentation;
- 1.3.7 ensure that employees and contractors/subcontractors are provided with effective consultation;
- 1.3.8 provide reports as requested on the effectiveness of H&S performance to all directors.

1.4 Employees shall:

- 1.4.1 work with reasonable care to ensure the health and safety of themselves, others and the environment;
- 1.4.2 ensure they understand the instructions provided and work in strict accordance with those instructions and the relevant training they have undergone;

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- 1.4.3 take care of their health through correctly using equipment, materials and controls, co-operating with measures used to minimise ill-health including participating in health surveillance, early reporting of concerns, wearing of PPE as identified by risk assessment of the activity and in accordance with the Site Rules;
- 1.4.4 co-operate with those allocated with H&S responsibilities;
- 1.4.5 report problems and deficiencies related to H&S.

1.5 H&S Team (Construction Director, Health & Safety Manager and our specialist independent advisers H & K Safety Services Limited) shall:

- 1.5.1 advise Jenner on new legislation, approved codes of practice and similar guidance, and their impact on the organisation and arrangements for health and safety management and the individual and collective responsibilities faced by employees and supply chain;
- 1.5.2 update Jenner on any significant H&S incidents;
- 1.5.3 facilitate annual H&S review and monitoring of Jenner;
- 1.5.4 facilitate independent H&S audits within Jenner (Contractors) Limited;
- 1.5.5 assist in compiling the annual assessment report on H&S performance for the Jenner Board;
- 1.5.6 co-ordinate the issuing of advice to Jenner on urgent H&S issues requiring immediate action;
- 1.5.7 liaise, where required, with the HSE, EA and other external bodies on H&S issues;
- 1.5.8 undertake investigation of any serious incidents to ensure all learning points are transmitted across Jenner (Contractors) Limited.

1.6 Contractors and Partners shall:

- 1.6.1 effectively and efficiently co-operate and communicate with Jenner on all relevant H&S matters;
- 1.6.2 meet the H&S standards required of them in the performance of the work activities undertaken with or on behalf of Jenner;
- 1.6.3 ensure those they employ are fit to undertake their duties.

1.7 Safety Representatives (both Trade Union and Staff) are able to exercise their rights to:

- 1.7.1 undertake investigations for reportable incidents;
- 1.7.2 represent the views of the staff to managers and to the Health and Safety Executive inspectors;
- 1.7.3 undertake inspections of the workplace;
- 1.7.4 raise Occupational Health concerns for resolution.

PART 2 – HEALTH AND SAFETY GENERAL ARRANGEMENTS

2.1 Key elements

The key elements of Jenner H&S general arrangements are:

- 2.1.1 a systematic approach to risk management, through pre-construction/design and the construction phase;
- 2.1.2 appropriate Occupational Health planning, management and interventions where necessary;
- 2.1.3 minimisation of waste at source and the promotion of 'reduce, reuse and recycle' in accordance with our Environment Policy, Waste Management Policy and the Site Waste Management Plan if applicable;
- 2.1.4 diversion of construction waste, whenever feasible, away from landfill;
- 2.1.5 contribution to nature, conservation and the enhancement of the natural environment whenever feasible;
- 2.1.6 provision of information, instruction, supervision and training sufficient to enable staff to carry out their duties safely and effectively;
- 2.1.7 monitoring compliance with and regular reviewing of the effectiveness of H&S arrangements;
- 2.1.8 investigation and review of all H&S incidents;
- 2.1.9 regular auditing;
- 2.1.10 provision of adequate funding, resources and expert advice.

2.2 Documentation

- 2.1.1 It is mandatory for Jenner including contractors/subcontractors working on our behalf, to meet the requirements of this Health and Safety Policy and our 'local' documentation and procedures that cover health and safety unique to that construction site or other workplace.

This 'local' documentation and procedures may include, but not be limited to:

Construction Phase Plan

Risk Assessment and Method Statement

Record of Induction

Weekly Inspection Report/Register; etc.

Site Rules – including instructions to contractors/subcontractors

PART 3 – HEALTH AND SAFETY MANAGEMENT ARRANGEMENTS

3.1 Specific Regulations

The following Regulations and management procedures are specifically dealt with as follows:

3.1.1 Construction (Design and Management) Regulations

The Company shall take into account all Health and Safety issues in the preparation of designs and tenders, and shall ensure this is managed effectively throughout all stages of the construction project.

As designers (including as Principal Designer) we shall ensure that:

- a) Our clients are aware of their duties.
- b) We consider fully the risks and hazards in constructing and maintaining the structure.
- c) We design to avoid or reduce risk.
- d) We consider measures to protect operatives if neither avoidance nor reduction of risk is possible.
- e) Design includes adequate safety information on Health and Safety.
- f) We pass on the information so that it can be included in the Construction Phase Plan.
- g) We co-operate fully with all others involved in the project.

As Principal Contractor we shall ensure that we:

- a) Provide risk assessments for particular tasks.
- b) Implement and develop the Construction Phase Plan.
- c) Are reasonably satisfied that any contractors appointed by the Principal Contractor are competent and have made adequate provision for health and safety.
- d) Obtain and check safety statements from contractors.
- e) Ensure the co-ordination and co-operation of contractors.
- f) Ensure training for health and safety is carried out.
- g) Have appropriate communication arrangements between contractors on site.
- h) Have arrangements for discussing health and safety matters with people on site.
- i) Allow only authorised people on site.
- j) Display notification details.
- k) Monitor health and safety performance.
- l) Pass information to the Principal Designer for the Health and Safety File.

3.1.2 Control of Substance Hazardous to Health (COSHH)

No substances that fall into this category will be used until:

- a) An assessment of the substances had been made after taking into account the locations and purpose for which it is to be used.

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- b) The relevant "Product Data Sheet" has been obtained from the substance manufacturers or supplier.
- c) The safety precautions necessary have been determined.
- d) Any protective equipment required has been obtained.
- e) The operatives have been informed of the potential hazards, precautions needed and the safe system of work to be adopted. Training has been given to enable the operatives to use the substance without risk to the health of either themselves or others. While a substantial proportion of materials used in construction work are not classed as being hazardous to health, many products that contain acids, alkaline, solvents, or toxic ingredients, do represent a health hazard. Therefore, in order to identify substances that are subject to these regulations, the criteria adopted will be two-fold:
 - i. if a material is required to carry the statutory hazardous substance packaging label.
 - ii. if a health hazard is created during a work operation such as dust from machining hardwoods, or cutting stone, brick and concrete etc. or vapours produced by mixing different products, then the COSHH assessments procedures will apply. Where protective clothing or equipment is needed for the safe use of a particular material, it must be ensured that it is suited for both the risk and task to be carried out. A record will be kept of the use, inspections or checks, and any maintenance that is carried out on that equipment (as required by the regulations).

3.1.3 Work at Height

We acknowledge that work at height remains one of the biggest causes of fatalities and major injuries in our industry. Common cases include falls from ladders and through fragile surfaces. 'Work at height' means work in any place where, if there were no precautions in place, a person could fall a distance liable to cause personal injury (for example a fall through a fragile roof, or into an open excavation).

We will ensure work is properly planned, supervised and carried out by competent people with the skills, knowledge and experience to do the job. We will use the right type of equipment for work at height.

3.1.4 Noise at Work Regulations

Compliance with these regulations will be achieved within the Company by the following procedures listed below.

- a) When noisy plant or equipment is either hired in, or purchased, the suppliers will be asked for the noise information details that they are required to provide under these regulations.
- b) Where existing noisy plant or equipment is used, then measures will be taken to determine the typical noise levels that can be expected from that equipment under normal working conditions.

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c) Where it is not possible to establish typical working noise levels due to for example, environmental influences, noise level readings will be taken. From this information, and the noise duration times that can be expected per day, an assessment of the potential noise hazard will be made. In the event that any of these exceeds any of the action levels, the work operatives will be informed of the risks of hearing damage, and the appropriate measures that are needed to reduce exposure to an acceptable level. Where the “peak action level” is exceeded, then operatives will be instructed in the remedial measures necessary, and that the need for these measures to be used at “all times” will be enforced.

3.1.5 Electricity, Gas and other Services at Work

In order to comply with the statutory requirements of these various regulations, the following policy will be adopted.

- a) All fixed installations will satisfy the standard specified in the current IEE and Gas Safe regulations. (This includes site offices, other welfare and stores etc.)
- b) All temporary and site electrical supplies will meet the requirements of the relevant British Standards for 110 volt centre tapped earth, construction site electrical equipment, components, tools and wiring.
- c) Each time a mobile generator is used at an operated voltage above 110 volts, then it will be effectively earthed to both the ground earth and any adjacent metalwork.
- d) Regular maintenance inspections (PA Testing) will be carried out on all electrical tools, extension leads, transformers and generators etc., to ensure that they remain in safe working condition at all times. The time period between such inspections will be dictated by the circumstances under which the equipment is required to operate and the requirements of our insurers.

3.1.6 Provision and Use of Work Equipment Regulations

The Company shall carry out compliance of these regulations by:

- a) Making sure that equipment is suitable for the use that will be made of it.
- b) Taking into account the working conditions and hazards in the workplace when selecting equipment.
- c) Ensuring equipment is used only for operations for which, and under conditions for which, it is suitable.
- d) Ensuring that equipment is maintained in an efficient state, in efficient working order and in good repair.
- e) Giving adequate information, instruction and training.

3.1.7 Lifting Operations and Lifting Equipment Regulations

Lifting equipment includes any equipment used at work for lifting or lowering loads, including attachments used for anchoring, fixing or supporting it. The Regulations cover a wide range of equipment including cranes, forklifts, lifts, hoists and MEWPs. Lifting accessories such as chains, slings and eyebolts are also included.

3.1.8 Manual Handling

The Company shall carry out compliance of these regulations by:

- a) Avoiding difficult manual handling operations where reasonably practical.
- b) Assessing adequately any difficult operations that cannot be avoided and provide guidance to assist.
- c) Reducing the risk of injury as far as reasonably practical.

3.1.9 Workplace (Health, Safety and Welfare) Regulations

The Company shall ensure that, where applicable, attention is paid to the working environment, general safety, welfare facilities and overall house-keeping.

3.1.10 The Management of Health and Safety at Work Regulations

Also known as the 'Management Regulations', these provide the following duties to us as an employer:

- a) making 'assessments of risk' to the health and safety of its workforce, and to act upon risks they identify, so as to reduce them
- b) appointing competent persons to oversee workplace health and safety
- c) providing workers with information and training on occupational health and safety, and
- d) operating a written health and safety policy

3.1.11 The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations

We acknowledge we are required to report a wide range of work-related incidents, injuries and diseases to the Health and Safety Executive (HSE). The Regulations require us to record in an accident book the date and time of the incident, details of the person(s) affected, the nature of their injury or condition, their occupation, the place where the event occurred and a brief note on what happened.

3.1.12 The Working Time Regulations

These Regulations detail working time and the employment of young workers (under 18 years of age). The Regulations cover the right to annual leave and to have rest breaks, and they limit the length of the working week.

3.1.13 Health and Safety (Display Screen Equipment) Regulations

When selecting equipment we shall take into account the working conditions and risks within the workplace. The equipment is to be suitable for the intended use and properly maintained. Adequate information, instruction and training will be given.

3.1.14 Personal Protective Equipment (PPE)

The Company shall provide every employee with his/her own safety helmet, high-visibility jacket and suitable steel toe-cap footwear and as operations require, ear defenders, protective glasses, breathing apparatus, gloves etc. All members of staff, site operatives, sub-contractors and visitors shall wear a safety helmet properly at all times when visiting or working on site, unless advised by the Site Manager that there is no foreseeable risk of head injury. If necessary, disciplinary action shall be taken to enforce this requirement.

Following the assessment of risk the Company shall:

- a) Ensure PPE is available and fit for the purpose to effectively protect the wearer.
- b) Ensure PPE is maintained whilst on site/workplace, is clean and is replaced when defective. PPE must be adequately stored when not in use.
- c) Ensure PPE is properly used.
- d) Ensure that training information and instruction is given to those who use PPE and how to look after it.

3.1.15 Asbestos

The Company shall carry out compliance of these regulations by:

- a) We will take reasonable steps to find out if there are materials containing asbestos in buildings we are working on, and if so, its amount, where it is and what condition it is in
- b) presume materials contain asbestos unless there is strong evidence that they do not
- c) make, and keep up-to-date, a record of the location and condition of the asbestos-containing materials - or materials which are presumed to contain asbestos
- d) assess the risk of anyone being exposed to fibres from the materials identified
- e) prepare a plan that sets out in detail how the risks from these materials will be managed
- f) take the necessary steps to put the plan into action
- g) periodically review and monitor the plan and the arrangements to act on it so that the plan remains relevant and up-to-date
- h) provide information on the location and condition of the materials to anyone who is liable to work on or disturb them

3.1.16 Scaffolding

All scaffolding on site will be completed in accordance with either:

- (i) TG20:21 Good Practice Guidance for Tube & Fitting Scaffolding, for which a Compliance Sheet(s) will be provided; or
- (ii) be completed as a 'Designed Scaffold'.

3.1.17 Temporary Works

All Temporary Works on site must be completed strictly in accordance with BS5975 'Code of Practice for Temporary Works Procedures and the Permissible Stress Design of Falsework.'