SD Painting Contractors Ltd

HEALTH AND SAFETY POLICY
COMPANY DETAILS

Name:    SD Painting Contractors Ltd

Address:  Big Trade Park,  
          Earl Road,  
          Cheadle. SK8 6PT

Tel No:   01625 462552

Name of person with the ULTIMATE RESPONSIBILITY FOR HEALTH & SAFETY matters within the company.

Mr Jay Parlane

Review Date: March 2016
Mr Jay Parlane (Managing Director) of SD Painting Contractors Ltd fully accepts his responsibility to his employees and indirect labour who work on his behalf, to ensure so far as is reasonably practicable their health, safety and welfare at work. These responsibilities are extended to any other persons who may be affected by the Company’s operations. In order to meet these obligations the Company shall so far as is reasonably practicable:

- Provide and maintain plant and systems of work which are safe and without risks to health.
- Make arrangements for ensuring the safety and absence of risks to health in connection with the use, handling, storage and transport of articles and substances.
- Provide information, instruction, training and supervision as is necessary to ensure the health and safety at work of employees.
- Maintain in a condition that is safe without risk to health any place of work under our control.
- Provide means of access to and egress from any place of work under our control which is safe and without risks to health
- Provide and maintain for our employees a working environment that is safe, without risks to health and is adequate as regards facilities and arrangements for their welfare at work.

Mr Jay Parlane accepts that health and safety is his responsibility and he will provide adequate money, time and other resources to ensure that all legal obligations are met. But in order to make this policy successful they depend on the co-operation of all employees.

It is the duty of all employees to comply with the safety policy at all times and to act responsibly and do everything that they can to prevent injury to themselves, other employees and the public at large.

Mr Jay Parlane will monitor the operation of this policy on a regular annual basis to ensure that it remains relevant and appropriate to the company and will make available the statement organisation and arrangements sections of the policy in prominent positions in the office and workplace for inspection by all employees and other interested parties.

SD Painting Contractors Ltd has made a commitment to continual improvement to conform to current applicable Health and Safety legislation and to improve our Health & Safety performance effectively and efficiently to meet changing business and regulatory needs. As part of our commitment to health and safety, SD Painting Contractors Ltd have the following health and safety training targets for 2015:

1. Mr Jay Parlane to attend CITB SMSTS course.
2. SD Painting Contractors Ltd to achieve 100% CITB CSCS compliance for all operatives.

Signed: .................................................. Date: 31st March, 2015
Managing Director
Roles and Responsibilities - Managing Director

The Managing Director (Mr Jay Parlane) is responsible for organising, planning and implementing, measuring performance and monitoring of the health and safety management system. Other specific responsibilities are:

- To identify individual health and safety training needs and renewal training in order to maintain employee competency.
- To liaise with Clients, Contractors and other relevant parties on all matters relating to health and safety.
- To provide and maintain Method Statements, Risk assessments and COSHH assessments etc. and ensure that all employees are fully aware of their contents. This includes the Managing Director briefing SD Painting Contractors Ltd operatives on all the health and safety issues affecting the site on which they will be working, prior to site work commencing.
- To establish the ‘competency’ of any sub-contract painters and decorators who are used periodically by SD Painting Contractors.
- To organise employee consultation on all aspects of health and safety and be the main point of contact for the “open door” policy of employee consultation.
- To ensure current employers’ and public liability insurances are in place.
- To ensure that all accidents and incidents (no matter how small) are investigated to prevent reoccurrence.
- To ensure that all plant and equipment is safe for use, fit for purpose and regularly maintained in accordance with statutory legislation.
- To ensure that all waste is returned to the main office and disposed of in accordance with current legislation.
- To deliver company health and safety “tool box talk” programme.
- To compile and compare year on year health and safety accident statistics.
- To report all reportable accidents to the Health and Safety Executive.
- To ensure the adequate supervision of employees.
- To implement work activities in accordance with the job specific method statements, risk assessments, COSHH assessments, PPE assessments etc., ensuring that all employees working on the site are aware of their contents.
- To provide site specific, relevant information, to employees and any third parties as necessary to minimise the risks to health and safety, including all relevant emergency information such as: Fire; Fire Evacuation and First Aid provision.
- To deliver project briefings to forepersons and other relevant employees prior to work commencing on site ensuring that all information relating to on site specific health and safety is understood.
- To monitor on site health and safety using the “work inspection” forms.
- To provide safe work equipment, access equipment for site operations that has been inspected and tested.
External Health and Safety Advisor

The Managing Director accepts his responsibility under Regulation 7 of the Management of Health and Safety at Work Regulations, to appoint one or more competent persons to provide health and safety assistance. Accordingly, an external health and safety advisor has been appointed (Mr Mark O’Donnell – Construction Safety UK)

The responsibilities of the Health and Safety Adviser shall be:-

1. To advise and assist the Managing Director in the development of the Company Health and Safety Policy by providing up to date information on health and safety legislative requirements and recognised good health and safety management techniques.

2. To provide current, up to date health and safety advice where required by the Managing Director.

3. To assist the Managing Director in the investigation of accidents and incidents and to compile reports, with recommendations.

Site Based Painters and Decorators

All employees must:

- To comply with all SD Painting Contractors health and safety procedures, working practices, risk assessments, method statements etc.
- Take care for their own health and safety.
- Consider the safety of other persons who may be affected by their acts or omissions.
- Work in accordance with information and training provided.
- Refrain from intentionally misusing or recklessly interfering with anything that has been provided for health and safety.
- Report any hazardous defects in scaffold and equipment, or shortcoming in the existing safety arrangements to the Managing Director.
- Not to undertake any task for which authorisation and/or training has not been given.
The responsibilities of Sub Contractors are:

- To read SD Painting Contractors Health and Safety Policy, and comply with the requirements which will be agreed prior to their appointment.
- To comply with all SD Painting Contractors health and safety procedures, working practices, risk assessments, method statements etc.
- Take care for their own health and safety.
- Consider the safety of other persons who may be affected by their acts or omissions.
- Work in accordance with information and training provided.
- Refrain from intentionally misusing or recklessly interfering with anything that has been provided for health and safety.
- Report any hazardous defects in scaffold and equipment, or shortcoming in the existing safety arrangements to Mr Jay Parlane (Managing Director).
- Not to undertake any task for which authorisation and/or training has not been given.
- To complete SD Painting Contractors Health and Safety Questionnaire and to demonstrate their competence in health and safety and their allocation of adequate and appropriate resources to address legislative requirements, by the provision of all relevant documentation, resources and satisfactory operations standards prior to work commencing to enable them to carry out their work requirements in a safe manner.
- To ensure that any injury sustained, or damage caused by them, is reported to Mr Jay Parlane (Managing Director) as soon as is practical.
3. Arrangements

3.1. Employee Communication and Consultation
3.2. Training
3.3. Site Specific Risk Assessments
3.4. COSHH Assessments
3.5. Hazardous Substance Safety, including Storage and Purchase
3.6. Young Persons and Expectant/Nursing Mothers
3.7. Company Health and Safety Handbook
3.8. Accident Reporting and Investigating
3.9. First Aid and Emergency Procedures
3.11. Fire Precautions
3.12. Work Equipment
3.13. Working at Height
3.14. PAT Testing
3.15. Personal Protective Equipment
3.16. Manual Handling
3.17. Public Safety
3.18. Asbestos
3.19. Lead Based Paints
3.20. Disposal of Waste Materials
3.21. Drugs and Alcohol Policy
3.22. Co-operation with Clients
3.23. Use of Company Vehicles
3.24. Management of Temporary Sub Contract Labour
3.25. Health Surveillance
3.27. Monitoring and Reviewing Health and Safety Performance

3.1. Employee Communication and Consultation

SD Painting Contractors consults with its' employees and temporary sub-contract labour in accordance with Guidance Note 16b of L95 'A Guide to the Health and Safety (Consultation with Employees Regulations). SD Painting Contractors have an “open door” policy, where all employees have access to The Managing Director at all times. All employees are aware of this. All employees have daily contact with the Managing Director, with everyone knowing each other on a first name basis. In this way, at any time, employees can bring to the attention of the Managing Director, any health and safety issues that may be concerning them. In addition, employees are consulted on a site by site basis by The Managing Director, with a view to maintaining a safe working environment and working practices.
SD Painting Contractors will communicate and consult with all employees and temporary sub-contract labour on the following issues:

- **Company Health and Safety Policy** – all employees are briefed on the contents of the policy. Through our open door policy, employees can directly bring to the attention of the Directors any deficiencies in the policy.
- **Specific site/project rules** – all employees are briefed by the Managing Director as to the contents of the method statement, risk assessments, COSHH assessments and any other matters relating to health and safety prior to commencing work on site. Employees have direct access (open door policy/mobile phone) and can bring to the attention of the Managing Director any concerns they may have to the health and safety procedures for the site on which they are working.
- **Changes in legislation or working best practice** – via in house training/tool box talks
- **The planning of health and safety training** – The Managing Director ensures that any refresher training is carried out and identifies new training requirements. Employees can also bring to the attention of the Managing Director any new training requirements that they consider to be of benefit in terms of health and safety.
- **The introduction or alteration of new work equipment or technology**

### 3.2. Training

SD Painting Contractors, recognises its' duty to provide suitable and sufficient training to all employees in accordance with The Health and Safety at Work Act and The Management of Health and Safety at Work Regulations.

Appropriate new and refresher training will be identified and organised by The Managing Director in consultation with individual employees to keep employees up to date with legislation and industry best practice.

All new employees will receive induction training (Health and Safety Awareness, company procedures). Training is also provided for specific areas: asbestos awareness, PASMA, IPAF, CITB SSSTS 2 day.

Where appropriate, training will be provided by external providers, however, “in-house” training may also be utilised.

As a minimum requirement, all SD Painting Contractors employees will be CITB CSCS certified (NVQ level 2 in painting and decorating and CITB health and safety test).

### 3.3. Site Specific Risk Assessments

The Managing Director is responsible for carrying out risk assessments on a site by site basis in order to identify where there is a risk of injury as a result of work activities being carried out by SD Painting Contractors Ltd employees and sub-contractors working on behalf of SD Painting Contractors Ltd. He is responsible, as far as is reasonably practicable, for ensuring that all risks are controlled so that the overall level of risk is low. This information will be passed on to the Client/main contractor. Continuing from the risk assessment process, a method statement is produced by the Managing Director which describes the safe system of work for the project.

SD Painting Contractors

Section 3 - H&S Policy - Arrangements
It is the responsibility of Mr Jay Parlane for ensuring that all SD Painting Contractors employees and sub-contractors working on behalf of SD Painting Contractors, are made aware of this information and carry out their work activities accordingly. A pro-forma is used to record that the site health and safety briefing/induction has been received by each employee.

### 3.4. COSHH Assessments

Using all available data (including manufacturer safety and product data sheets), the Managing Director is responsible for carrying out COSHH Assessments on a site by site basis to identify any risk of injury caused by potentially dangerous substances being used by SD Painting Contractors employees. He will provide this information to the Client, Main Contractor, SD Painting Contractors employees and any other persons who may be affected.

It is the responsibility of the Managing Director to ensure that all SD Painting Contractors employees and sub-contractors working on behalf of SD Painting Contractors are made aware of this information and appropriate action taken to minimise the risk of injury. The information is communicated to employees and temporary sub-contract painters and decorators by Mr Jay Parlane, prior to work commencing.

### 3.5. Hazardous Substance Safety, including Storage and Purchase

Specifications for all projects are provided directly by the Client. Where a safer, less hazardous material is available we will inform the Client prior to commencing works on site. SD Painting Contractors obtain a copy of the manufacturer’s material safety data sheet from the material manufacturer. This is used for information purposes while completing the COSHH risk assessment. The material data sheets are also sent to the Client/Main Contractor.

All materials are purchased from bona fide manufacturers in sealed containers/packaging. Highly flammable materials such as white spirit are stored in lockable metal cabinets away from any ignition sources. Quantities of all flammable materials are kept to a minimum. Quantities of white spirit taken on site are kept to a maximum of 2L.

### 3.6 Young Persons and Expectant/Nursing Mothers

The Managing Director is responsible for carrying out separate risk assessments for young persons and expectant/nursing mothers.

### 3.7. Company Health and Safety Handbook

It is the responsibility of The Managing Director to ensure the all employees are given a copy of the Company Health and Safety Handbook. This describes the safe working practices and procedures which all SD Painting Contractors employees and temporary sub contract painters and decorators are expected to adhere to whilst carrying out their normal work activities. Employees receive the handbook from the Managing Director upon commencing employment and receive updates as appropriate.
3.8. Accident Reporting and Investigating

- The Managing Director will report and investigate all accidents and dangerous occurrences in accordance with RIDDOR.
- All other accidents and injuries no matter how minor, must be reported to Mr. Jay Parlane and Main Contractor site agent (if applicable). The Managing Director is responsible for ensuring that the injured person (or his/her representative), record the accident in the Company Accident Book and the main contractor's site accident book.
- All accidents will be investigated by the Managing Director under the guidance of the external health and safety advisor. The Managing Director will then take the appropriate remedial/disciplinary actions.

3.9. First Aid and Emergency Procedures

First aid arrangements are made with the individual main contractors and all SD Painting Contractors employees (and persons working on behalf of) are informed of details prior to commencement of work.

Emergency procedures are designed to give warning of imminent danger and to allow personnel to move to a place of safety. The Managing Director is responsible for ensuring that all SD Painting Contractors employees and temporary sub contract painters and decorators are informed of, and are fully conversant with, the emergency procedures for each site in accordance with individual main contractors' arrangements. This information is communicated to employees and temporary sub contract painters and decorators during the main contractor site induction, however, where SD Painting Contractors is acting as The Main Contractor, the Managing Director will communicate this during the pre-start employee briefing. Where a main contractor has no emergency procedures in place, Mr. Jay Parlane will appoint a "nominated person", responsible for telephoning the emergency services and a first aid box will be located in each van. Mr. Jay Parlane is responsible for checking the contents of the site first aid box on a weekly basis.


Where SD Painting Contractors is employed by a main contractor, welfare facilities are the responsibility of the main contractor. Where inadequate, it is the responsibility of The Managing Director to bring to the attention of the main contractor's site agent. Where SD Painting Contractors is working directly for the client, it is the responsibility of The Managing Director to ensure that appropriate facilities are provided. As a minimum the following requirements will be provided on all sites: toilet/washing facilities and eating/rest facilities accessible on site.

3.11. Fire Precautions

Where SD Painting Contractors is contracted to a main/principal contractor, the Managing Director will ensure that all employees and temporary sub contract painters and decorators are fully aware of the main/principal contractor arrangements on a site by site basis. This is communicated to s during the main contractor site induction. A record of SD Painting Contractors operatives attending this induction is kept by the main contractor and SD Painting Contractors.
Where SD Painting Contractors is working directly for the client, it is the responsibility of the Managing Director to ensure that suitable and sufficient fire precautions are in place. The Managing Director will obtain details of the building owner/occupier fire precautions, including escape routes and assembly points. The Managing Director will communicate this to all site employees and temporary sub contract painters and decorators during a pre-start briefing.

3.12. Work Equipment

The Managing Director (Mr Jay Parlane) must ensure the all equipment is:

- Suitable for its intended use. All work equipment carries a “CE” mark.
- Safe for use, maintained in a safe condition and, in certain circumstance, inspected to ensure this remains the case, and keep records.
- Used only by people who are experienced and have received adequate information, instruction and training.
- Fixed Scaffold: Provided by main contractor only. Managing Director to ensure that a copy of the scaffold “handover certificate” is obtained prior to work activities being carried out and to obtain copies of all weekly “competent person” inspections.
- Mobile Towers and MEWPS: Provided by access hire company. Managing Director to obtain copy of current examination certificate from the hire company, prior to work activities being carried out. Note: MEWPS examinations must be carried out every 6 months. Mr Jay Parlane to ensure that SD Painting Contractors operative completes daily inspection of MEWP and returns inspection form to the Managing Director.
- Managing Director to visually inspect all work equipment prior to issuing for site use.
- Any work equipment damaged on site is to be immediately removed from use and returned to the Managing Director for replacement and/or repair.

3.13. Working at Height

Where SD Painting Contractors is required to carry out work at height, the following procedure will be followed by the Managing Director:

Procedure:

- First identify what work at height is required. The question should be asked is it possible to prevent working at height and eliminate the hazard altogether. If the hazard cannot be eliminated then the Managing Director will carry out a risk assessment to assess the nature of the hazards present. What control measures, access equipment and sequence of work are required? If access equipment is required follow the options below as a hierarchy.

Preferred option:

- Use as a means of fall prevention fixed edge protection, such as scaffolding and toe boards to prevent persons or materials falling from leading exposed edges and fragile roof surfaces. Refer to section 3.12 for details.

Secondary option:

- The use of Mobile Elevated Working Platforms (MEWPS) such as scissor lifts and cherry pickers when used are to be operated in areas suitable for the selected equipment. Competent operatives only will use the equipment with statutory and routine inspections being carried out before use (6 monthly thorough inspections min).
All MEWP operatives are to wear harness and lanyards irrespective of the task being undertaken unless not required by the MEWP manufacturer.

**Last resort options:**

**Podium steps:**
- Podium steps are to be erected by competent persons only. Ensure that when in operation the working platform is on level even ground and that handrail’s are set at the correct height. All brakes must be on when the podium step is being used.

**Towers:**
- Towers are to be erected by competent persons only (PASMA accredited). Ensure that when in operation the working platform is on level even ground and that handrail’s are set at the correct height. All brakes must be on when the tower is being used.

**Ladders / Stepladders / Hop ups /:**
- In accordance with The Working at Height Regulations, 2005 SD Painting Contractors only use ladder access equipment where a risk assessment has identified that the use of other access equipment is not appropriate due to the low risk and short duration of the work.

When selecting and using ladder access equipment, SD Painting Contractors complies with the guidance contained in indg. 402: “Safe use of Ladders and Stepladders: An Employer’s Guide” and indg. 405 “Top Tips for Ladders and Stepladder Safety”.

**Selection and Use of Ladders:**
- When selecting ladders SD Painting Contractors take into account the "Hierarchy of Controls".
- SD Painting Contractors only use Class 1 “Industrial” type ladders.
- Ladders are only selected if the work requires the ladder to be in one position for less than 30mins and less than 10kg of materials/equipment are being used by the painter.
- Ladders to be inspected for defects prior to use.
- Ladders are only erected on solid, stable ground, of sufficient strength to support the ladder plus load.
- When using a ladder, operatives will maintain three points of contact at all times.
- The ladder must be positioned so that the operative does not need to stretch/overreach.
- Ladders are erected at an angle of 75° or 1:4.
- When in use, ladders will be secured to prevent slipping by tying at the top, bottom or by use of a proprietary non-slip anchor at the bottom.
- Only competent, qualified operatives erect, work on and dismantle ladder access equipment.
- Mr Jay Parlane to visually inspect all work equipment prior to issuing for site use.
- Any work equipment damaged on site is to be immediately removed from use and returned to the Managing Director for replacement and/or repair.

Section 3 - H&S Policy - Arrangements
3.14 Work Equipment / Electrical Equipment

- Electrical equipment owned by SD Painting Contractors is PAT tested by the Managing Director using a Parker Bell PB 500 Electrical Safety Checker. The device is returned to Parker Bell on an annual basis for calibration.
- Managing Director to visually inspect all work equipment prior to issuing for site use.
- Any work equipment damaged on site is to be immediately removed from use and returned to the Managing Director for replacement and/or repair.
- Airless spray units are examined on an annual basis by an externally sourced competent company.
- Hired equipment: At the point of delivery, the hire company is required to provide evidence of inspection/examination (as appropriate) to show that the equipment is suitable for use.

3.15 Personal Protective Equipment (PPE)

- PPE is issued by Mr Jay Parlane in accordance with the site specific risk assessment, method statement, COSHH assessment, Manual Handling Risk Assessment, PPE risk assessment etc. and is available to all SD Painting Contractors employees and temporary sub contact painters and decorators when required to ensure their health and safety whilst carrying out normal working activities. PPE is only be used as a "last resort" method of controlling risk.
- Mr Jay Parlane is responsible for ensuring that all PPE is in good condition and complies with any expiry dates where applicable. Items of PPE which are damaged should be immediately removed from use by the Foreperson and disposed of safely.
- The Company uses FFP3 half-mask respirators (particles only – conforms to EN149) and A1/P2 half mask respirators (gases/vapours – conforms to EN 140 mask and EN141 filter)

3.16 Manual Handling

SD Painting Contractors comply with all the requirements of the Manual Handling Operations Regulations, 1992. Prior to commencing work activities the Managing Director carries out a manual handling risk assessment.

Generally, the maximum load carried by an employee is less than 10kg, therefore no lifting aids are required. Lifting/carrying of loads are of short duration, non repetitive, for short distances (not greater than 20m). This usually consists of carrying the materials from main stores to a van and then from the van into the work site. All employees and temporary sub contract painters and decorators and temporary sub contract painters and decorators are issued with gloves to assist with grip while carrying out lifting operations.

Materials such as paint are supplied in containers (usually no greater than 5kg), with handles to facilitate carrying.

Large items such as ladders may present a hazard due to their size and weight: Accordingly they are lifted and carried using a team lift technique.

Section 3 - H&S Policy - Arrangements
3.17. Public Safety:

SD Painting Contractors recognise its duty under the Health and Safety at Work Act, to ensure that third parties are not adversely affected by its acts or omissions whilst carrying out work activities. Accordingly, risk assessments are carried out for all work activities which take into consideration all third parties associated with each individual project.

3.18. Asbestos:

SD Painting Contractors recognise that in carrying out refurbishment and re-decoration projects, there is the potential for employees to be exposed to asbestos. In accordance with Reg. 10 of the Control of Asbestos Regulations 2006, all employees receive suitable and sufficient asbestos awareness training. Accordingly, all employees attend a UKATA accredited asbestos awareness training course. The level of risk is very low as only accidental exposure to asbestos fibres is likely. Temporary sub-contract painters and decorators working on behalf of SD Painting Contractors are expected to provide evidence of asbestos awareness training prior to commencing working for the Company. In order to minimise the risk of accidental exposure:

SD Painting Contractors does not carry out any asbestos removal activities. It is Company policy that no scraping or sanding of asbestos surfaces takes place.

On re-decoration/refurbishment projects, where SD Painting Contractors is acting as a subcontractor, the main contractor is asked if there is the potential risk of asbestos exposure and if there is any documentation relating to asbestos surveys that have been carried out. A suitable and sufficient risk assessment is carried out in consultation with the main contractor, identifying safe systems of work.

Where SD Painting Contractors is acting directly for the client, where there is the potential for accidental asbestos exposure, the Client is asked to provide a copy of their Asbestos Management Plan and if appropriate, advised that an Asbestos Survey should be carried. No work is carried out until a safe system of work has been devised and all employees are briefed, prior to commencing work on site.

3.19. Lead Based Paints:

SD Painting Contractors recognise that in carrying out re-decoration/refurbishment projects on older buildings, there may be a potential risk of exposure to lead based paints. Accordingly, all employees receive Lead Awareness Training. Where decoration takes place on existing buildings, where there is a potential for lead based paints to have been used, the paint is tested by the Managing Director using a proprietary lead testing kit. If lead paint is identified, the risk of exposure is eliminated by not carrying out any sanding, scraping or paint removal activities. This ensures that no lead paint dust is created. The Managing Director will inform the Client if lead paint is identified.

3.20. Disposal of Waste Materials:

SD Painting Contractors is not registered as a producer of waste since it produces well under the 500kg of hazardous waste stipulated by the Environment Agency. All waste paints are returned to Crown Decorator Centre/Dulux Decorator Centre in their original sealed containers for safe disposal.
3.21. Drugs and Alcohol Policy:

SD Painting Contractors recognise the importance of safeguarding and promoting the health and safety of its employees and third parties affected by our work. The effective management of drug and alcohol abuse is an integral part of this.

It is the policy of SD Painting Contractors:

- To comply with all current legislation, especially the Health and Safety at Work Act, 1974 and the Misuse of Drugs Act, 1971.
- To not knowingly permit any employee of DN Decorations Ltd, to report for work or attend work premises under the influence of drugs or alcohol, nor consume these while on duty or on the premises.
- To provide a positive approach to employees seeking help, or guidance, in overcoming, alcohol or drug related problems.
- To take suitable action, usually dismissal, against anyone under the influence of alcohol or drugs in breach of this policy.

3.22. Cooperation with Clients

Employees will always familiarise themselves with client procedures when first attending site, in particular general site access, emergency procedures and high risk work activities including permit to work systems. This is carried out during the main contractor site induction or SD Painting Contractors pre-start briefing. Clients site procedures and specific instructions will be followed at all times.

3.23. Use of Company Vehicles:

SD Painting Contractors will ensure that all vehicles provided for use by employees are in good condition and compliant with the requirements of the DVLA. The driver is legally responsible for driving the vehicle safely, at speeds that are appropriate to the road conditions and within the national speed limits. All drivers will hold a current, valid UK driving licence. Drivers will notify the Managing Director of all driving offences that have resulted in a fine, penalty points or prosecution (even if the offence occurs out of work hours).

The Company operates a NO SMOKING policy in Company vehicles at all times.

Employees must not answer a mobile phone, make a call or text a message while driving a Company vehicle or when stationary in a traffic queue with the engine running.

No passengers are to be carried in the load compartment of the vehicle.

Drivers of vehicles must park the vehicle in a safe position so that it does not cause obstructions or reduce visibility for other road users.
Drivers will ensure that reversing manoeuvres are kept to a minimum, and where reversing is necessary, that it is undertaken safely.
3.24. Management of Temporary Sub Contract Labour

Prior to employing a Temporary Sub-contractor, it is the responsibility of the Managing Director to assess their ‘competency’ prior to site work commencing.

- The assessment requires all sub-contractors to provide the following information/documentation:
  - Name: Age: CIS number: Address: Contact details.
  - Copies of CITB CSCS accreditation.
  - Copies of any other training certificates.
  - Copy of public liability insurance.
  - Details of similar projects that they have carried out.
  - 2nr. References.
  - Details of any improvement notices, prohibition notices or subject to prosecutions from the H.S.E. If so, give details.

All temporary sub contract labour is supervised and directed by Mr Jay Parlane and is required to comply with all SD Painting Contractors health and safety policies and procedures. Prior to commencing work, all temporary sub-contract labour are issued with a copy of SD Painting Contractors health and safety policy by the Managing Director and are asked to sign that they have read the document, understood its contents and agree to abide by the safety procedures and processes contained within.

Temporary Sub-Contract Labour who use their own vehicles are asked to provide a copy of their driving licence, current M.O.T. and Certificate of Insurance to demonstrate that they comply with current UK legislation.

Temporary Sub-Contract Labour are subject to SD Painting Contractors site health and safety and work quality inspection procedures.

3.25. Health Surveillance:

As part of an in-house Company “toolbox talk” delivered by the Managing Director, all employees are made aware of the hazards associated with the following work activities:

- Hand sanding and scraping of new and previously painted surfaces creating small amounts of dust. This includes the adverse effects dust can have on lung function/breathing difficulties and asthma.
- Solvents within oil based paints that can lead to skin irritation or contact dermatitis. Employees are issued with INDG 233 Preventing Contact Dermatitis.
- Solvent vapours during application causing headaches, drowsiness, breathing difficulties and asthma.
- Inhalation or ingestion of lead paint dust from sanding/scraping: Employees are asked to report symptoms such as mood changes, depression, tension, short term memory loss, poor hand/eye co-ordination, loss of dexterity in limbs.
- Inhalation or ingestion of asbestos fibres: All employees attend a UKATA accredited Asbestos Awareness Training Course. Employees are asked to report any shortness of breath or a persistent dry cough to the Managing Director. The Managing Director will send the employee to his/her General Practitioner for examination.

Employees are instructed to immediately report any of the above symptoms to the Managing Director. Where appropriate, the Managing Director will ensure that the employee sees his/her General Practitioner for medical examination.

The following procedures apply to any breaches of health and safety requirements on all work sites. Monitoring of compliance will be carried out by the Managing Director during his weekly site visits.

1. **White Card:**

A white card is used to record a discussion with an individual regarding an unsafe condition or behaviour. A verbal warning will be issued, together with an indication of the improvements required. All white cards will remain on an individual's record for 6 months.

Examples of infringements at this level are:

- Failure to use correct P.P.E.
- Failure to use access equipment provided.
- Knowingly working on unsafe working platforms/access equipment.
- Unauthorised alteration of working platforms.
- Operating plant or equipment without authority, e.g. using a mobile tower without having PASMA accreditation.
- Failure to comply with agreed methods of safe working, i.e. risk assessments, method statements, working procedures set out in the Company handbook.

2. **Yellow Card:**

Should the first verbal warning go unheeded, or the individual commits a 2nd offence, within one month, a 2nd verbal warning will be given and the individual will be suspended from work for the rest of the day without pay. The yellow card will remain on record for 12 months.

3. **Red Card:**

Any individual committing a further subsequent offence by an individual who has already received a yellow card, will result in their immediate suspension from work pending an investigation by the Company Health and Safety Advisor and the issuing of a formal written warning. This will remain on record for a period of 12 months and any other breach of health and safety within this period will be deemed as gross misconduct and the individual will be liable to dismissal.

4. **Gross Misconduct:**

Any individual(s) committing serious health and safety infringements will be immediately suspended from work (without pay), pending an investigation of the Company Health and Safety Advisor. In normal circumstances this investigation will be completed within 5 working days. If the evidence shows that the individual is guilty, the individual will be liable to immediate dismissal without the issuing of any verbal or written warnings.

Examples of infringements at this level are:

- Premeditated breach of safety rules where there is a perceived risk to life.
- Working while under the influence of drugs or alcohol.
- Unauthorised removal of safety devices, e.g. guard rails, harnesses/lanyards.
- Deliberately exposing other workers or members of the public to danger by not complying with recognised safe systems of work as described in the method statement, risk assessments or Company Employee Manual.
• Deliberately not complying with the instructions in the method statement, risk assessments or Company Employee Manual
• Wilful spillage that may contaminate ground or watercourses.
• Unauthorised disposal of waste.

3.27. Measuring and Reviewing Health and Safety Performance

• Measuring Performance:
  In accordance with HSG 65, the Company uses a range of regular, planned proactive monitoring of health and safety performance, including site observation inspections, work equipment inspections and appropriate work equipment examinations. Inspections of Project Specific Method Statements and Risk Assessments are carried out on a sample basis to ensure that they have been carried out and are “suitable and sufficient”. Reactive monitoring is also carried out and includes: recording of accidents in HSE BI 510 accident book, maintaining accident statistics (including accident frequency rate and accident incidence rate) and keeping accident absenteeism records.

• Reviewing:
  A monthly review of site observation/work inspection sheets is carried out by the Managing Director. The findings of the review are used to continually improve the company health and safety management system. The Managing Director carries out a monthly inspection the accident book, accident statistics record and employee absence record to ensure that there is not a trend developing as a result of inadequate health and safety management systems.