



WATKIN JONES GROUP

HEALTH & SAFETY POLICY

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WATKIN JONES GROUP

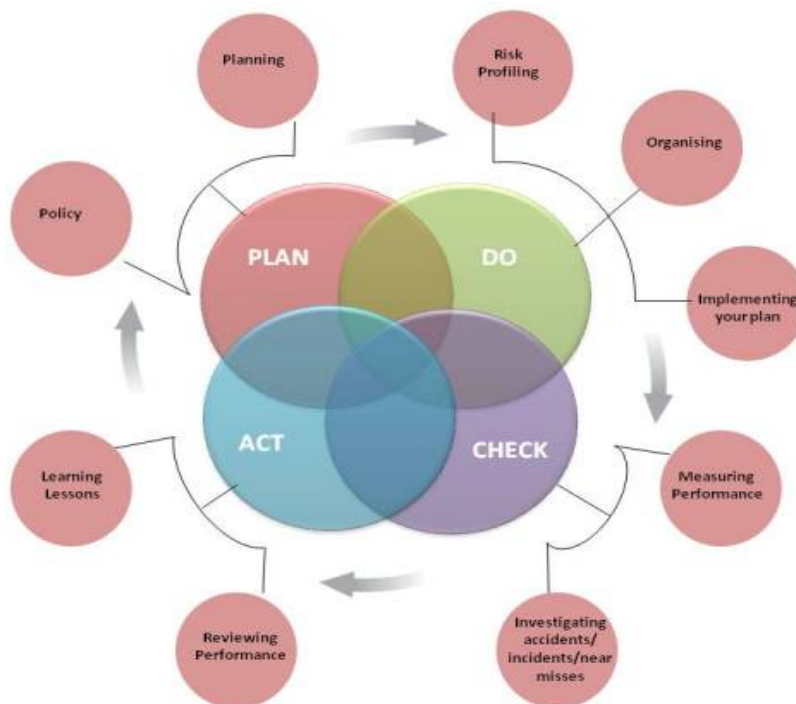
HEALTH & SAFETY POLICY

INTRODUCTION

Under section 2 (3) of The Health and Safety at Work etc. Act 1974, all companies that employ more than four employees are obliged to provide, maintain, and review as necessary a written health and safety policy.

The company identifies that to meet its statutory obligations, a documented health and safety management system should be implemented within the company. This will also ensure that the company meets its statutory obligations as required by the Management of Health and Safety at Work Regulations 1999.

The company will therefore adopt the HSE recognised health and safety management system detailed in HSG65; this follows the systematic and cyclical approach of Plan, Do, Check, Act. This section of the policy will document how the company intends to meet the elements required.



PART 1

GROUP GOVERNANCE OF HEALTH & SAFETY

Group Organisation for Health, Safety & Welfare

Watkin Jones PLC Board have ultimate responsibility to ensure Health, Safety and Welfare is suitably managed within Watkin Jones Group.

The Executive Team lead by the Chief Executive Officer are responsible for ensuring that the day to day operation of the Company's health, safety, and welfare policies are operated throughout the Group.

The Executive Team are assisted by the Health, Safety and Environmental Director in ensuring suitable health, safety and welfare policies are in force throughout the group, as well as monitored and reviewed at suitable intervals.

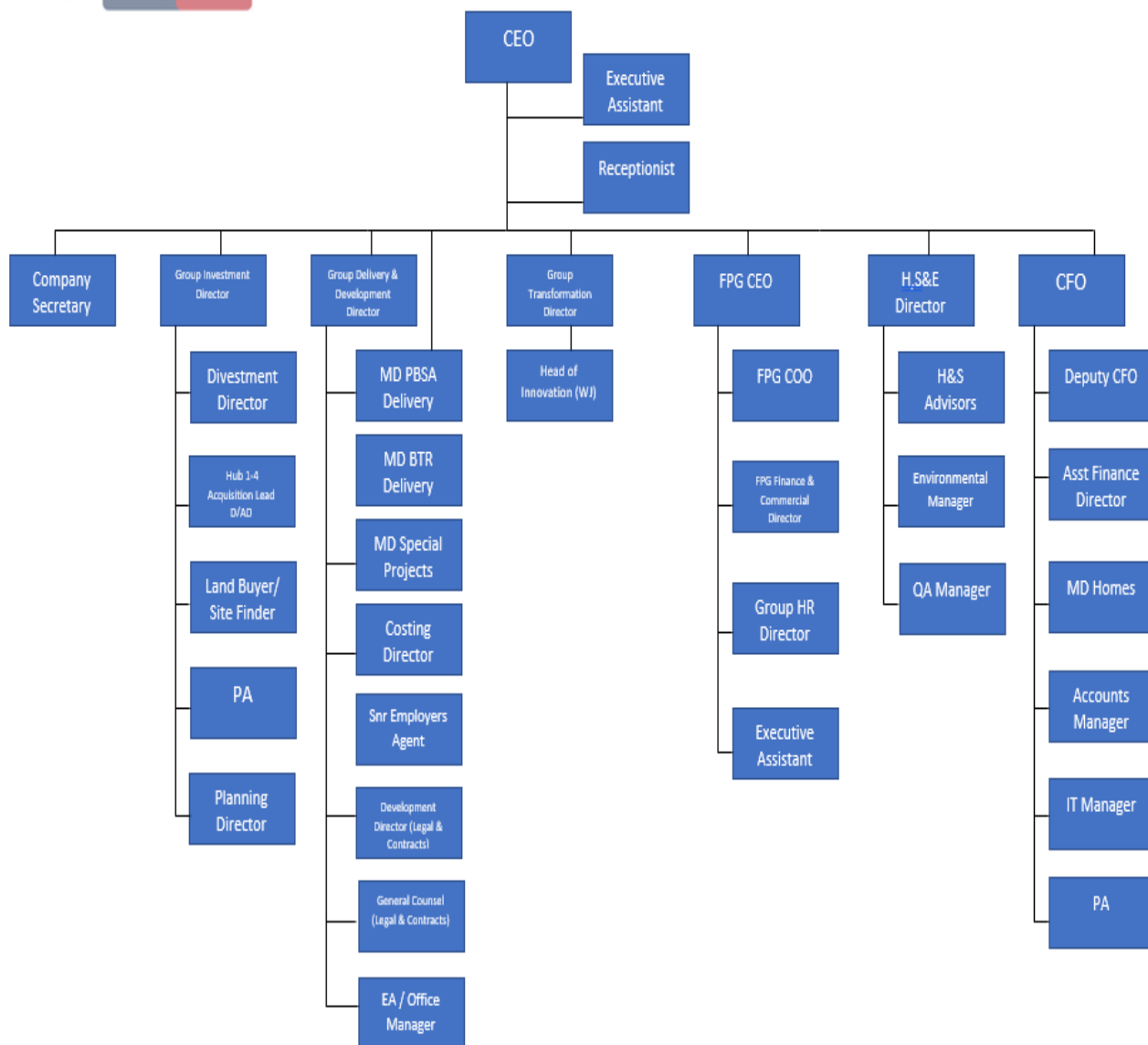
To ensure health, safety and welfare is of the highest priority within Watkin Jones Group, the Health, Safety and Environmental Director reports directly to the Chief Executive Officer.

There are two distinct parts to the Group. The part of Watkin Jones Group which carries out the construction and development part of the Business and Fresh Property Group which manages purpose-built accommodation.

It is recognised that the two parts of the Group operate in very different environments when it comes to health, safety, and welfare matters.

Therefore Part 3 of this Health & Safety Policy deals with Fresh Property Groups specific health and safety policy requirements, which are different to the rest of Watkin Jones Group.

WATKIN JONES GROUP ORGANOGRAM



Rev 1 – July 2020

BOARD OF DIRECTORS

- Will promote a strong and vibrant health and safety culture.
- Will monitor the health and safety performance of the Company by receiving information from the company's Health, Safety & Environmental Director.
- Will ensure that relevant health and safety procedures are established, monitored, and reviewed with the aid of the Health, Safety & Environmental Director.
- Will promote an interest in and an enthusiasm for, health and safety and will set a good personal example.

CHIEF EXECUTIVE OFFICER

- Will make adequate financial provision for ensuring that the policy and Company procedures are effectively carried out.
- Will cause health and safety issues to be monitored and take such action as necessary to maintain or improve the company's health and safety standards.
- Will regularly review the company's health and safety policy with the assistance of the Health, Safety & Environmental Director and Health & Safety Advisors.
- Will encourage and support employees in their efforts to improve the Company's health and safety performance.
- Will promote an interest in and an enthusiasm for health and safety throughout the Company and will set a good personal example.

PART 2
WATKIN JONES GROUP

1. WATKIN JONES GROUP STATEMENT OF INTENT FOR HEALTH, SAFETY & WELFARE

In addition to the moral and commercial obligations to prevent accidents and ill health, Watkin Jones Group must meet specific legal requirements for health, safety & welfare.

The general duties of an employer are laid down in the Health & Safety at Work Act Etc. 1974 and are expanded upon in subordinate legislation and the associated Approved Codes of Practice. This forms an integral part of the overall company policy.

It is therefore the policy of Watkin Jones Group Ltd, to wherever reasonably practicable:

- To demonstrate an ongoing & determined commitment to improving health and safety at work throughout the organization.
- Safeguard the health, safety and welfare of all employees and sub contractors whilst at work.
- Ensure that persons who are not in its employment, but who may be affected by its work activities, are protected from any hazards created by those work activities.
- Provide safe plant and equipment for use at work and to ensure it is properly inspected and maintained.
- Identify hazards associated with work activities, assess the risks, and define the systems of work required to eliminate or minimize the risk.
- Provide the necessary information, instruction, training and supervision for employees and others who may be affected by hazards associated with work activities.
- Provide adequate resources to ensure that work activities can be carried out safely.
- Ensure that the workplace, the access to it and egress from it, is safe and without risk to health.
- Ensure that any substances, e.g. chemicals, oils, greases, gases etc. which are used as part of the work process, are assessed for their possible effect on health and appropriate systems of work adopted for their safe transportation, storage, use and disposal.
- Ensure that dusts, fumes, noise, vibration, and other occupational hazards, are controlled within safe limits.
- Ensure that no adverse environmental impact results from the work activities.

- Ensure that provision is made for adequate welfare facilities for employees and sub contractors.
- Involve the workforce in all aspects of health, safety and welfare and solicit their co-operation and assistance to create a safe working culture.
- Ensure that formal monitoring arrangements are adopted to identify hazards and to check on control measures and their enforcement.
- Ensure that consideration is given to dealing with accidents, incidents and emergencies and that contingency arrangements are specified
- Regularly review health and safety performance and arrangements to ensure they remain suitable and to enable measures to be put in place to allow the Company to continually improve its health and safety performance.

Health, safety, welfare, and environmental issues rank equally with the Company's other objectives and observance of them is recognized as being consistent with the achievement of successful company performance. The Company is committed to continually improving its health & safety performance.

Signed: Richard Simpson

Richard Simpson

Position: Chief Executive Officer

Date: 15 October 2020

2. ORGANISATION TO IMPLEMENT THE POLICY

This part of the policy details the individual health & safety responsibilities of the line management within the Watkin Jones Group.

Individuals named in this part obviously have a great deal of responsibility and are therefore expected to lead and display a positive attitude towards health and safety matters.

2.1 Divisional Managing Directors

- Will monitor the health and safety performance of the Company's activities and take such action as is necessary to maintain or improve the performance.
- Will ensure that all employees are familiar with those parts of the policy that affect them or the activities in which they are engaged.
- Will cause all employees to receive adequate and appropriate safety training as identified.
- Will support all managers and employees in their efforts to improve the Company's health and safety performance.
- Will be responsible with the assistance of the Health, Safety & Environmental Director for the formulation and execution of a suitable safety training policy.
- Will periodically review inspection and audit reports with the Health, Safety & Environmental Director of the Company's activities.
- Will promote an interest in and enthusiasm for health and safety and will set a good personal example.

2.2 Construction Directors

- Will, when involved in the selection of sub contractors, cause them to be assessed to ensure that they are competent in health and safety matters and properly resourced.
- Will support Contract, Project, and Site Managers in their efforts to improve the Company's health and safety performance.
- Will, in the prolonged absence of the person responsible for contracts management, appoint a suitable person to undertake the responsibilities as set out in this policy.
- Will when involved with the overseeing of a contract ensure that contracts are adequately planned and resourced.
- Will, when involved with the overseeing of a contract, ensure that construction phase plan is available and revised as necessary throughout the project.
- Will, when involved with the overseeing of a contract, cause the arrangement and completion of the contract review.
- Will promote an interest in and enthusiasm for health and safety and will set a good personal example.

In addition to the foregoing section when the company is appointed as Principle Designer will cause the following duties to be fulfilled.

- Will ensure that the Client has completed the F10 Notification of Project Form and ensure that it has been sent to the Health & Safety Executive (HSE).
- Will ensure clients are aware of their duties under the Construction (Design & Management) Regulations 2015 prior to allowing work to commence.
- Will not arrange for a designer to carry out a design unless satisfied that the designer has the necessary competence and resources (as detailed in the designer's procedures).
- Will receive information from the client in relation to the premises for which construction work will be undertaken and ensure that the information is included in design and tender documentation, where appropriate.
- Will ensure that any designer engaged for the project is aware of "designer's" responsibilities as laid down in this policy.
- Will take reasonable measures to ensure, where appropriate the co-operation of designers involved in the project.
- Will advise clients and contractors where appropriate, on the necessary competence and resources of designers required for the project.
- Will advise clients where appropriate, of the adequacy of the construction phase plan and the necessary competence and resources of contractors required for the project.
- Will ensure suitable pre-construction information has been prepared and is provided to tendering contractors.
- Will cause a suitable health and safety file to be prepared and revised as necessary for each structure and will hand this to the client when complete.
- Will allow contractors adequate time for planning before they commence work on site.

2.3 **Contract/Project Manager**

- Will monitor the health and safety performance of the contracts under their control and will take such action as is necessary to maintain or improve the performance.
- Will take such action as is necessary in response to unsafe design details or working procedures raised by the Project or Site Manager.
- Will ensure that employees, under their control, are familiar with those parts of the health and safety policy, which affect them or the activities in which they are involved.
- Will review and recommend, where necessary, adequate, and appropriate training and instruction required for staff and labour under their control.
- Will support and encourage staff under their immediate control in their efforts to improve health and safety performance.

- Will share relevant safety issue related experience with other Managers to improve the safety knowledge throughout the Company.
- Will where they are involved in the selection of sub contractors, assess them to ensure that they are competent in health and safety matters and properly resourced.
- Will ensure all relevant Company health and safety procedures are implemented and followed.
- Will monitor and review the quality, content and standard of method statements and risk assessments produced for Company activities prior to the commencement of the activity and take such action as is necessary to ensure that they are adequate. This includes all activities either carried out directly or by sub-contractors.
- Will cause the Contract Start Up procedure to be completed prior to the pre-start up meeting and ensure that it is implemented as the contract starts.
- Will promote an interest in and enthusiasm for health and safety matters and set a good personal example.

2.4 **Site Manager**

- Will monitor the general health and safety performance of operatives whilst on site and take such action as is necessary to ensure that Company and statutory rules and standards are always complied with and by all persons on site.
- Will prior to any activity that creates a significant risk ensure that it is adequately and appropriately assessed, and the results recorded in writing.
- Will raise such design details or working procedures that appear to them to be unsafe with the Contract or Project Manager.
- Ensure that project specific risk assessments and method statements are received from contractors in plenty of time to allow a full appraisal of the project specific risk assessments and method statements to ensure they are suitable and sufficient to allow a start on site.
- Will ensure that any risk assessment or method statement is brought to the attention of the persons, if practicable, who are at risk and ensure that they are aware of all the preventive and protective measures to be adopted by use of the Company's Team Talk Procedure.
- Will ensure that all operations carried out under their control reflect the details contained in any method statement and or risk assessment produced for that activity and that they conform to general good practice and current health and safety legislation.
- Will ensure that staff and operatives under their direct control receive, where necessary, adequate, and appropriate training regarding health and safety matters prior to allowing them to undertake the activities.
- Will record the health and safety performance of sub contractors for the end of contract review meeting.

- Will consult with all employees in relation to health and safety matters which affect them and encourage and review any comments offered to ensure a healthy and safe working environment.
- Will take reasonable steps to ensure co-operation between all contractors including sub-contractors and Watkin Jones Group's direct works to achieve an integrated approach in relation to health and safety matters.
- Will ensure the details contained in the construction phase plan are current.
- Will ensure that all reasonable precautions are taken to prevent unauthorized entry onto site and, so far as is reasonably practicable, always maintain the site in a secure condition.
- Will cause all relevant Company health and safety procedures to be implemented and followed.
- Will ensure that all those who enter site are provided with an adequate induction of the health and safety requirements and the rules to be followed on site and ensure a record of these inductions is kept.
- Will check the competence of all those working on site and maintain the records of competence on site file.
- Will properly delegate responsibilities to sub-ordinates and ensure that they receive all relevant information and instruction.
- Will assess subordinates' competence prior to delegating responsibilities to ensure that they can carry out the assigned tasks.
- Will promptly provide relevant information for inclusion into the project health and safety file.
- Will promote an interest in and enthusiasm for health and safety matters and set a good personal example.

2.5 **Other Construction Site Staff Members of Watkin Jones Group, including Engineers and Foreman**

- Will assist the Project / Site Manager with health and safety monitoring on site and take such action as is necessary to improve the performance including preventing any foreseeable unsafe practice and report to the Project / Site Manager the details of any unsafe incident.
- Will assist the Project / Site Manager in implementing the company policy on health and safety and the implementation and carrying out of the Company's health and safety procedures.
- Will prior to being delegated any responsibility discuss the implications of the assigned tasks.
- Will promote an interest in and enthusiasm for health and safety matters and set a good personal example.
- Will follow and abide by the Company's health and safety rules, policies & procedures.

2.6 Health, Safety & Environmental Director

- Will initiate and maintain positive measures to raise health and safety standards throughout the Company's activities.
- Will provide the Board of Directors and the Executive Team with information to assist them with monitoring the Company's activities.
- Will provide the Managing Directors and Directors with information in connection with training to enable them to make the necessary provision for relevant health and safety training.
- Will cause periodic inspections and investigations as is necessary of all the Company's activities to determine whether the Company's health and safety policy and procedures are being followed.
- Will prepare for consultation Company health and safety procedures and review any comments prior to issuing for approval.
- Will cause the issue, on a controlled copy basis, of approved health and safety procedures and will cause any identified health and safety training to be carried out as is necessary.

In addition to the foregoing section the Health, Safety & Environmental Director will cause the following duties to be fulfilled by the Company's Health and Safety Advisors:

- Will attempt to create a positive health and safety culture at all levels throughout the organization.
- Will assist and advise management at all levels with the preparation, implementation and where necessary, review of the health and safety policy.
- Will carry out as necessary periodic inspections and investigations of the Company's activities and report to the contract and line management any apparent breaches of health & safety legislation, company policy or company procedures.
- Will liaise with enforcing authorities and with safety organizations to promote the interests of the company.
- Will ensure they are fully conversant with current health and safety legislation, codes of practice and guidance information to ensure the health, safety and welfare of all the Company's employees, sub contractors and persons who may be affected by the Company's activities.
- Will prepare and issue general health and safety information in the form of health and safety information memos and/or health and safety alerts to relevant members of staff.
- Will, when invited to do so assist line management with the drawing up of any risk assessments and method statements as is necessary.
- Will support management and operatives at all levels in their efforts to improve health and safety performance and set a good personal example.
- Will as a last resort and at their absolute discretion, stop an activity or indeed the

whole job, if he has any safety concerns that justify that action, and will receive the full support of the Board of Directors for this action.

2.7 Health & Safety Advisors

- Will attempt to create a positive health and safety culture at all levels throughout the organization.
- Will assist and advise management at all levels with the preparation, implementation and where necessary, review of the health and safety policy.
- Will carry out as necessary periodic inspections and investigations of the Company's activities and report to the contract and line management any apparent breaches of health & safety legislation, company policy or company procedures.
- Will liaise with enforcing authorities and with safety organizations to promote the interests of the company.
- Will ensure they are fully conversant with current health and safety legislation, codes of practice and guidance information to ensure the health, safety and welfare of all the Company's employees, subcontractors and persons who may be affected by the Company's activities.
- Will prepare and issue general health and safety information in the form of health and safety information memos and/or health and safety alerts to relevant members of staff.
- Will, when invited to do so assist line management with the drawing up of any risk assessments and method statements as is necessary.
- Will support management and operatives at all levels in their efforts to improve health and safety performance and set a good personal example.
- Will as a last resort and at their absolute discretion, stop an activity or indeed the whole job, if they have any safety concerns that justify that action, and will receive the full support of the Board of Directors and the Executive Team for this action.

2.8 Estimators

- Will, so far as is reasonably practicable, ensure that adequate resources are allocated to health, safety and welfare matters raised in the pre-construction information and in the proposed construction phase plan.
- Will ensure that when in discussions with prospective sub contractors all relevant health, safety, and welfare information in relation to the project is passed on for consideration in their bid so far as it is available at the time.
- Will ensure adequate financial provision has been included within the tender for the company Health and Safety Policy and Procedures to be carried out and followed.
- Will make all reasonable enquiries at tender stage for the connection of temporary services.

2.8 Buying & Subcontract Procurement Departments

- Will, when appointing sub-contractors assess their competence in health, safety and welfare matters and ensure that they have allocated adequate resources to the relevant parts of the construction phase plan. e.g.
- Make enquiries and assessments with regards to the contractors past performance.
- Ensure a current copy of their health and safety policy is received.
- Ensure that the name and qualifications of the person or organization that provides competent health and safety assistance for the contractor is provided.
- Ensure the above information is passed to the relevant Contracts Manager for review prior to the order being placed.
- Will make arrangements for ensuring the articles or substances for use at work have relevant COSHH information about the safe use, storage, transportation, and disposal of them.
- Will ensure that the relevant COSHH information is passed on to site for assessment for products supplied.
- Will, so far as is reasonably practicable, procure those articles or substances judged to be the safest products available for any given process.

2.9 Quantity Surveyors

Will, when appointing subcontractors assess their competence in health, safety and welfare matters and ensure that they have allocated adequate resources to the relevant parts of the construction phase plan. e.g.

- Make enquiries and assessments with regards to the contractors past performance.
- Ensure a current copy of their health and safety policy is received.
- Ensure that the name and qualifications of the person or organization that provides competent health and safety assistance for the contractor is provided.
- Ensure the above information is passed to the relevant Contracts Manager for review prior to the order being placed.
- Will take such action as is necessary to prevent any unsafe situation and report any such event to the Project / Site Manager.
- Will monitor the health and safety performance of sub contractors, so far as is reasonably practicable and contribute to the end of contract review meeting.
- Will ensure that the Company's health and safety policy and procedures are carried out, so far as is reasonably practicable.
- Will promote an interest in and enthusiasm for health and safety matters and set a good personal example.

2.10 Designers/Design Managers

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Have specific duties that they must adhere to under the Construction (Design & Management) Regulations 2015 and therefore with the aim of protecting people and property during construction and maintenance activities and giving due regard for demolition and/or future refurbishment or alteration of the buildings designer(s):

- Will not cause a design to be prepared unless they are satisfied that the client is aware of all of their duties under Construction (Design and Management) Regulations 2015 and any associate legislation or guidance.
- Will ensure before arranging for a design that they or designers under their control are competent and adequately resourced.
- Will ensure, so far as is reasonably practicable that all designs that are undertaken:
 - Avoid foreseeable risks.
 - Combat risks at source and
 - Give priority to measures that protect everyone rather than just the individual.
- Will ensure that designs conform to the Workplace (Health, Safety & Welfare) Regulations 1992 when part or all the structure is to be used as a workplace.
- Will carry out a risk assessment and provide written documentation, which may include highlighted notation on drawings, highlighting hazards that have been identified as requiring on site control during construction and maintenance activities.
- Ensure that the design of the scheme protects people and property during its operation and throughout its lifetime.
- Will ensure, so far as reasonably practicable, that adequate, relevant, and comprehensible information is passed onto construction and maintenance personnel and any others who may be affected by the structure, its materials, or processes.
- Will co-operate & co-ordinate with the Principle Designer, Principal Contractor, and other designers to ensure an integrated approach to health and safety.

2.11 All Employees

An employee is anyone who has a verbal or written contract of employment and or works under the direct control of Watkin Jones Group. This includes agency personal and labour only sub contractors.

All individuals have legal obligations regarding health and safety under various pieces of legislation. The duties are very general in nature and have a broad application. However, the company has summarized those duties as below.

Every employee whilst at work will:

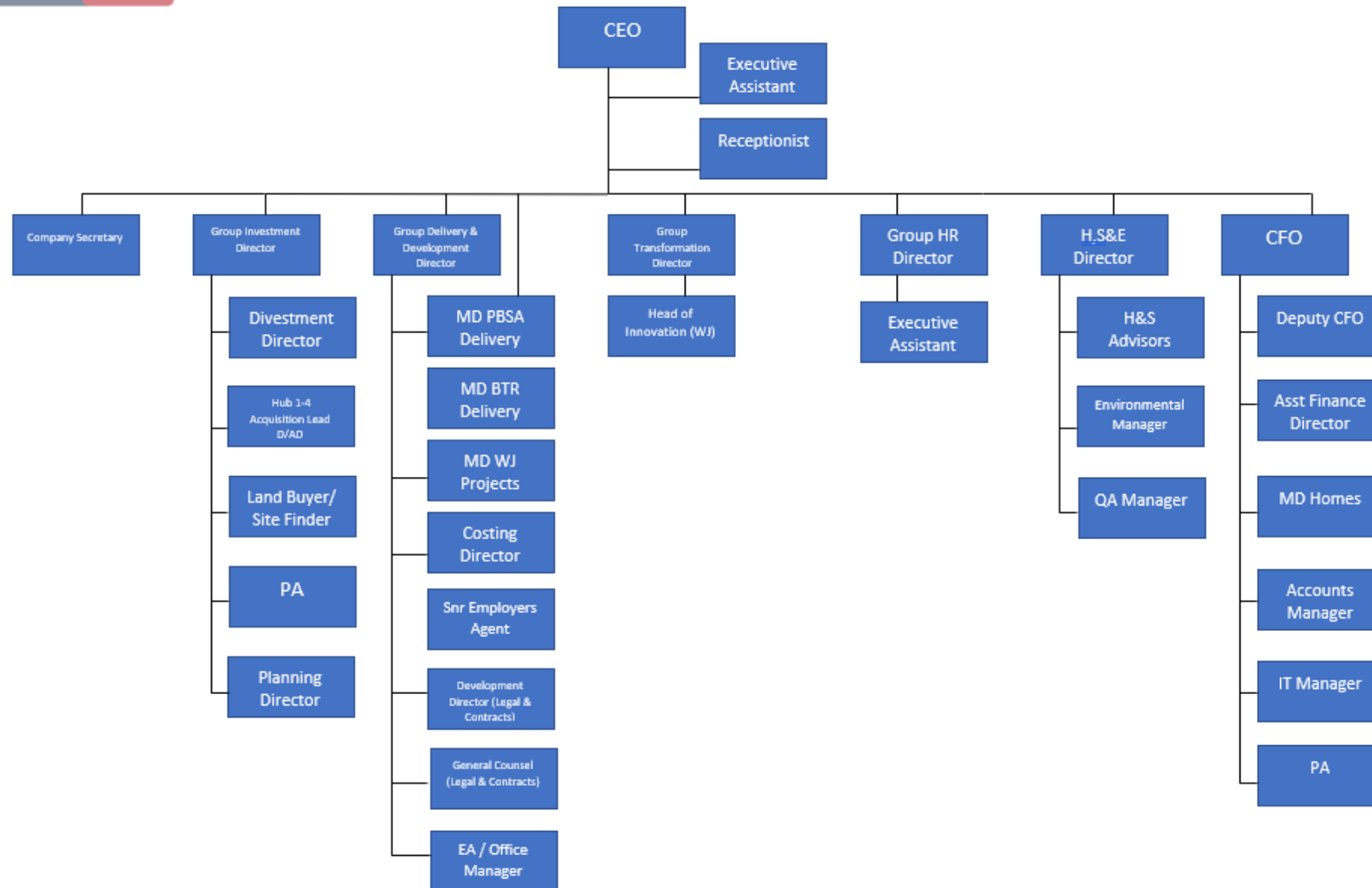
- Take reasonable care for their own health and safety and that of others who may be affected by their acts or omissions.
- Follow all the Company's health and safety policies, rules & procedures and with any instruction given by the Company's line management team in relation to

health, safety, and welfare matters.

- Only use machinery, equipment, substance, or any article that they have been instructed to and have been trained and are competent in the use and/or application of.
- Not knowingly, use any item of plant or machinery where a defect exists which may pose a risk to Health & Safety.
- Not knowingly do anything that will damage or render inoperable anything provided in pursuance of health, safety, and welfare.
- Attend any health & safety related training or instruction and co-operate with the trainer and management team during the said training or instruction.
- Not carry out any activity that they consider poses a risk to themselves or others or with which they have reasonable cause to be concerned about, whosoever instructs them.

Inform their employer or a member of the Company's management

- Of any work situation which represents a risk of any nature to either themselves or others.
- Of any matter that represents a short coming in the Company's health, safety, and welfare arrangements.
- Of any accident or incident (including near miss) immediately and without undue delay.



Rev 2 – September 2020

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3. ARRANGEMENTS FOR HEALTH, SAFETY AND WELFARE

- 3.1 Training
- 3.2 Risk Assessment
- 3.3 CDM
- 3.4 Supervision & Activity Control
- 3.5 Safe Place of Work & Housekeeping
- 3.6 Environmental Protection & Waste Control
- 3.7 Workforce Involvement
- 3.8 Occupational Health Control and Personal Protective Equipment (PPE)
- 3.9 Welfare Arrangements
- 3.10 Site Security & protection of the Public
- 3.11 Reporting of Accidents & Dangerous Occurrences
- 3.12 Monitoring, Audit & Review
- 3.13 Emergency Arrangements
- 3.14 Fire Prevention & Control
- 3.15 Permits to Work
- 3.16 Public Relations
- 3.17 Protection of Young Persons
- 3.18 Work at Height
- 3.19 Traffic Management & Pedestrian Segregation
- 3.20 Foreign Workers
- 3.21 Alcohol & Drugs
- 3.22 Asbestos
- 3.23 Plant & Equipment
- 3.24 Display Screen Equipment
- 3.25 Driving at Work
- 3.26 Agile Working

3. ARRANGEMENTS

This section outlines the arrangements, which comprise the main Company Health & Safety Management System.

In compliance with the Construction (Design & Management) Regulations 2015, the Company will develop the pre-construction information provided by the Client, through the Principle Designer and co-ordinate the site construction activities when performing the role of Principal Contractor. When on occasions where the Company is the Client and/or Principle Designer the Company will ensure that the duties of these parties as described in the Construction (Design & Management) Regulations 2015 are discharged.

The Company has a Health & Safety Procedures Manual. This is a live document and therefore is being developed and reviewed as an ongoing exercise. Training is carried out to introduce new procedures as they are issued.

3.1 Training

The Company will ensure that employees are provided with the necessary training they require in order that they are able to carry out their duties, roles, and responsibilities competently.

To be able to identify individual training requirements the Training & Development Manager will ensure roll specific training requirements have been identified for all employees. For new employees training needs will be identified at 3monthly and 6monthly probationary reviews.

The training needs of employees will also be identified at individual's performance reviews, introduction of new legislation or Company procedure and regular review of Company and individual training requirements at the regular health and safety and training review meetings. These reviews will also consider the need for refresher training to ensure employees remain competent.

Health and Safety Training will be provided by industry approved training organisations, for example CITB, or will be certified, accredited, or licensed training providers.

For bespoke training activities a clear consultation process will take place between the Health and Safety Team, Learning and Development Team and any managers with an operational interest. Records of discussions and consultations will be retained for reference by the Learning and Development Team.

In addition to the above all those starting on site for the first time receive site-specific health & safety induction training. The site rules will be explained to them and they will be required to sign the rules confirming they understand and agree to abide by them. Directly employed operatives will be issued a copy of the Watkin Jones Site Safety Booklet. This is also issued to the principles of all sub-contractors.

Team talks will also be carried out on the Company's construction sites with operatives (including those employed by sub-contractors) on site specific health and safety topics, method statements and risk assessments. A record of these team talks will be maintained.

Only trained operatives are permitted to operate plant and certain items of equipment. Evidence of competence will be required from direct employees and employees of sub contractors before being allowed to operate items of plant or

equipment.

All contractors working on the Company's construction sites must hold and present to Watkin Jones Group Management a current CSCS competency card (or one from an equivalent scheme) for the role/s they are undertaking before commencing work on site to demonstrate they are competent.

3.2 Risk Assessment

The completion of Risk Assessments is a requirement of the Management of Health and Safety at Work Regulations. The regulations place a duty on the employer to carry out a suitable and sufficient risk assessment when a significant risk is identified. The risk assessment should identify those at risk, the level of risk and detail the preventive and protective measures.

The Company currently operates with 2 types of risk assessment "generic" and "task specific". The generic risk assessment covers operations which are repetitive and of a similar nature. The Company operates Risk Assessment Software to allow Managers to adapt these risk assessments for specific site/task conditions.

Task specific risk assessments are blank pro-forma for operations of a non-standard nature.

The Company operates a Programming for Safety Procedure where all operations with a significant risk are identified at the beginning of the project from the project programme to help ensure that all risk assessments are completed prior to the operation and discussed with the individuals involved.

Contractors are required to provide copies of their risk assessments for appraisal to ensure that they are suitable and sufficient prior to them commencing any works. To allow adequate appraisal of contractor's risk assessments, contractors will be required to provide copies of their risk assessments in plenty of time. Where reasonably practicable contractors are to aim to provide risk assessments 10 days prior to the date on which they wish to commence works.

Operatives must receive a briefing on any risk assessments and safe system of work they are working to and sign a briefing record before commencing works.

3.3 Construction, Design & Management

The Company will ensure it carries out its duties regarding the Construction (Design & Management) Regulations 2015. To do this the Company will ensure that the Client is aware of their duties regarding the Construction (Design & Management) Regulations 2015 prior to commencement of a project.

The Company will ensure that a Principle Designer has been appointed by the Client and that an F10 Notification of Project has been submitted, where applicable, prior to the commencement of the project.

When The Company is appointed as Principle Designer then it will ensure that an F10 Notification of Project has been submitted; review with the Client the competency of the designers and any contractors that they appoint, ensure that suitable, sufficient and project specific pre-construction information has been provided and communicate this information to those who require it, ensure the designers coordinate and risk assess their designs and that any residual risks are communicated to relevant people and produced at the end of the project a suitable health and safety file or update it if one already exists.

When performing the role of Principle Contractor, the Company will develop the pre-construction information to produce a Construction Phase Plan. This plan will be reviewed and updated throughout the currency of the project. When appointing contractors, the Company will ensure they are provided with adequate time for planning and given any relevant information from the construction phase plan and ensure that contractors activities are monitored and coordinated throughout the project. The Company will provide suitable welfare facilities from day one of the project and provide the Principle Designer with any information they require for inclusion into the Health and Safety File.

For specific roles and responsibilities regarding CDM please refer to the Organisation Section of this policy.

3.4 **Supervision & Activity Control**

Responsibility for health, safety and welfare lies with contract and line management within the organization.

This responsibility is passed through the management chain to the Project / Site Managers who provide direct supervision at site level on a day-to-day basis.

Senior Management will provide adequate resources and support to enable the Project / Site Managers to adequately control and co-ordinate activities at site level as detailed in Part 2 "Organization" of this policy.

3.5 **Safe Place of Work & Housekeeping**

All high-risk activities are assessed as detailed in the Risk Assessment Procedure. The risk assessment should identify amongst other issues the actual place of work and assess the hazards associated with that place.

High-risk places of work include:

- Working at Height
- Confined Spaces
- Deep Excavation
- Public Highway or Site Haul roads
- Demolition Sites
- Working with asbestos
- Work on live services

Good standards of housekeeping are an essential feature of accident prevention, and therefore are strictly managed by regular cleaning and availability of suitable and sufficient waste bins or skips.

Adequate, secure storage arrangements are a priority and accumulations of waste must be avoided, particularly flammable waste.

Materials are to be stored in a safe and secure manner. Materials are to be managed so that only the minimum amounts of materials are stored on site at any one time.

Twenty-four hour clean up notices will be issued to contractors who fail to maintain an acceptable level of housekeeping. If contractors fail to clean up within this time, then Watkin Jones Group will clean up the affected area and charge the relevant contractor accordingly.

3.6 Environmental Protection & Waste Control

The Company's Environmental Manager ensures that all relevant legislation is followed regarding the disposal of waste products.

An individual waste management plan is produced for each project the Company undertakes. The Company is committed to reducing waste going to landfill.

The Company is ISO 14001 accredited and the environmental impact of any project the Company undertakes will be assessed and control measures will be put in place in order to protect the environment.

The Health, Safety and Environmental Director will arrange for regular audits of projects to be carried out to ensure they are complying with the Company's Environmental Policy.

Whenever reasonably practicable the Company will segregate waste materials.

Whenever reasonably practicable the Company will divert waste from landfill sites and arrange for waste materials to be recycled.

3.7 Workforce Involvement/Consultation

Workforce involvement and consultation in the management of health & safety is essential for effective accident prevention. Therefore, the Company actively encourages all levels of employee consultation from director level to the site labourer.

Group Employee Representatives

At a Group level there are Employee Representatives who meet on a regular basis to represent the views of their colleagues and speak on their behalf on workplace matters. The number of meetings will depend on what is happening within the Business at the time. Employee representatives will be elected by the workforce and will be taken from the following areas of the Group to ensure all areas are equally represented:

- PBSA
 - Build Team
 - Commercial Team
 - M&E, Design and Office Support
- Build to Rent
- Homes Residential
- Fresh Property Group Central
- Investment (Planning, Hubs, Divestment)
- Group Delivery Resource (Quality and Compliance, Costing, EA, Maintenance and Legal)

Operational Site Level Consultation

At daily site level probably the most important means of consultation is when the actual construction team discusses the content of a work method statement and risk assessment (team talk).

The use of suggestion boxes will also be encouraged to allow those who may wish to remain anonymous to make suggestions on how to improve health and safety standards in the workplace.

The Company achieves effective communication and consultation in a number of ways including:

- Via Health & Safety Inductions.
- Via Health & Safety Information Memos/safety alerts. A means of transmitting any relevant Health & Safety information.
- Via Health & Safety Procedures
- Via Health & Safety Training Courses.
- Via Health & Safety Meetings & Committees
- Via Health & Safety Initiatives & Campaigns.
- Via regular Staff Meetings.
- Via Individual Reviews which are held with each member of staff.
- Via Team talks

3.8 **Occupational Health Control and Personal Protective Equipment (PPE)**

Control of Substances Hazardous to Health

Arrangements are in place to assess the effects of any substances hazardous to health and the adoption of relevant control measures as required under the Control of Substances Hazardous to Health (amendment) Regulations (COSHH) 2002.

Noise

Under the Control of Noise at Work Regulations 2005 assessments are made to ascertain noise levels and all relevant precautions are taken to avoid or protect against excessive noise levels. All machines will be fitted with manufacturers approved silencers. Hearing protection will be available to all who require or request it on site.

Vibration

Under the Control of Vibration at Work Regulations 2005 the vibration risks to employees will be assessed and control measures will be put in place to reduce the level as is reasonably practicable. Wherever possible machine attachments will be employed over hand-held tools. When using hand-held vibrating tools, the most appropriate tool will be selected with the lowest level of vibration. Refer to Company Procedure Use of Vibrating Tools.

Manual Handling

Where reasonably practicable the Company will avoid manual handling. The Company will provide mechanical means to transport loads to or as near to their final positions as reasonably practicable. Mechanical means may include the use of telehandlers to transport materials around site and lift up onto loading bays etc. or cranes to lift materials into position, or the use of construction hoists to lift materials up to height and thus reduce or eliminate the need to manual handle materials to the absolute minimum.

Kerbs and paving slabs will be laid using mechanical kerb and slab laying devices.

Where it is not possible to avoid manual handling, then, where reasonably practicable, manual handling aids will be used, such as sack trucks, board trolleys, pallet trucks etc.

Where manual handling is unavoidable then the Company will assess the task and ensure arrangements are put in place to reduce the risk of injury from manual handling to as low as is reasonably practicable.

Dust

Where reasonably practicable alternative methods of construction will be used which do not create dust. Where this is not possible, dust will be controlled in the following ways, whichever is the more appropriate:

- Wet cutting techniques to prevent dust becoming airborne.
- Spraying and dampening down the work areas to minimize airborne dust.
- Use of appropriate vacuum extraction to collect the dust and prevent it becoming airborne.

Where operatives are involved in processes that create dust, they will be required to wear the appropriate respiratory protection which will be an FFP3 respirator as a minimum. Operatives using such protection will be required to have undergone face fit testing for the respirators they are using.

Where reasonably practicable the use of brushes to clean up will be avoided and suitable vacuums or wet brushing techniques used instead to reduce the risk of exposure to harmful dusts. Vacuums must be fitted with either an H or M Class Hepa filter.

Personal Protective Equipment

Only when the adoption of reasonable engineering or management control are unable to reduce a hazard to an acceptable level, will personal protective equipment be supplied and used by the operative. Arrangements will be made to control such issue to ensure that the operatives are competent to use such equipment. Company employees who require it will be issued personal protective equipment free of charge.

Those persons using cut off saws to mechanically cut stone, masonry or concrete products will be required to wear fit tested FFP3 respirators as well as using a wet cut technique to protect against silica.

Those persons using mechanical saws to cut timber or any other product where wet cutting is not possible, and which creates harmful dust when cut will be required to wear face fit tested FFP3 respirators as well as having a suitable dust extraction unit fitted to the saw (which must be fitted with either an H or M Class Hepa filter).

The minimum Personal Protective Equipment required on one of the Company's

construction sites is a safety helmet, high visibility vest or jacket, pair of protective footwear with toe and sole protection, a suitable pair of gloves for the task being undertaken and suitable eye protection for the tasks being undertaken.

Where external workers are working in the rain, and where task specific eye protection is not required, then the wearing of general-purpose eye protection may be relaxed for those external workers only. General purpose eye protection must be worn again by those external workers as soon as the rain has stopped.

3.9 Welfare Arrangements

Welfare arrangements provided on site will comply with Schedule 2 of The Construction (Design & Management) Regulations 2015 as well as any additional requirements of the client. The Company has made a commitment to improving standards of welfare wherever practicable by developing a "standard of welfare provision". The extent and provision of welfare facilities is normally assessed during the pre-start meeting.

The minimum allowable welfare provision on site will be: Site Manager office/s, canteen / mess facilities (including water boiling and food heating facilities and fridge), toilet facilities (plumbed in where reasonably practicable), drying room and Storage Containers, hot and cold running water and first aid facilities. The numbers and sizes of facilities will be dependant on the size and nature of the individual project.

Welfare provision in offices & other workplaces will conform to the Workplace (Health, Safety & Welfare) Regulations 1992.

Suitable arrangements will be made to ensure that welfare facilities are always maintained and kept in a clean and hygienic condition.

3.10 Site Security & Protection of the Public

All reasonably practical measures are taken to prevent unauthorized access and secure any interface with the public. Particular attention is paid to preventing children being injured on a site.

Measures considered include:

- Fencing/hoarding to prevent unauthorized access to site.
- Removing ladder access or boarding over.
- Securing and immobilizing all Plant and Equipment.
- Stacking any items which can fall or topple e.g. drain rings or pipes, in a way not to cause danger.
- Backfilling or securely fencing deep excavations.
- Covering manholes securely.
- Ensure any voids are adequately guarded or covered to prevent falls.
- Spoil heaps and sand piles will be as low as possible and battered & sealed to a safe angle of repose.

- Bricks and blocks will be stored as low as possible and damaged packs placed on the ground.
- The bases of cranes will be suitably secured.

The requirement to provide further security measures such as employing security personnel, installing CCTV, alarm systems etc. will be assessed and reviewed on an individual project basis.

3.11 Reporting of Accidents & Dangerous Occurrences

Accident & Dangerous Occurrences are reported to the Project/Site Manager or Line Manager, who is responsible for completing the Accident Report. The Project/Site Manager must investigate and complete the Internal Accident Report Form and forward these forms including required supporting documentation to the Health & Safety Department immediately.

The Project/Site Manager or Line Manager will telephone the relevant Health & Safety Advisor as soon as possible following an incident. The Health & Safety Advisor will then review the circumstances and decide if further investigation over and above that already carried out is required.

Any accidents that are reportable under the Reporting of Injuries, Deaths & Dangerous Occurrences Regulations 2013 will be reported by the Health & Safety Department.

Refer to Accident Reporting Procedure.

3.12 Monitoring, Audit & Review

A formal recorded system of inspection, monitoring and review, is established to enable all tiers of management to assess control measures and identify problem areas.

These include weekly site safety inspection reports completed by the Site Manager. Contract Directors/Managers will carry out their own formal, independent audit monthly.

The Health & Safety Department will arrange for regular health and safety inspections to be carried out on all parts of the Company's activities and produce written reports.

These reports and all subsequent corrective actions are reviewed by Senior Management.

Health and Safety is an agenda item at the weekly plant and labour meeting where day-to-day health & safety items are discussed and resolved.

A regular Health & Safety Meeting is held with the Contract Directors to discuss and resolve health & safety issues & training requirements.

Quarterly Safety Committee and Review Meetings will be held by Senior Management to assess performance and set objectives, as part of a continuous improvement programme.

Annually the Site Managers will undergo a health and safety appraisal with the assistance of the Contracts Managers. The Contract Managers will also undergo a

health & safety appraisal by the relevant Director.

The health and safety performance of sub-contractors is monitored and reviewed throughout the project at regular progress review meetings. At the end of each project, a Post Contract Review meeting is held and during this meeting not only is the health and safety performance of sub-contractors reviewed, but also any health and safety issues and any health and safety lessons learnt are discussed and information is distributed to all who require it.

3.13 **Emergency Arrangements**

An assessment will be made of the risk of serious and imminent danger, at the workplace and control measures for dealing with the emergencies established.

Specific arrangements will be made for:

- Communication with Emergency Services
- First Aid arrangements
- Fire fighting capability
- Evacuation and assembly arrangements
- Drills and exercises
- Rescue from height
- Rescue from confined spaces
- Spill Control

3.14 **Fire Safety, Prevention & Control**

The Company will follow the guidelines set out in the Construction Confederation's & Fire Protection Association's document Fire Prevention on Construction Sites, The Joint Code of Practice on the Protection from Fire of Construction Sites and Buildings Undergoing Renovation, 9th Edition and HSG 168 Fire Safety in Construction and the Regulatory Reform (Fire Safety) Order 2005.

The Company will appoint competent fire marshals in all its offices and construction sites who will carry out regular inspections of fire fighting equipment, fire alarms and emergency lights as well as carry out regular tests of the fire alarms and emergency lights and arrange for fire drill to be conducted on a regular basis.

The Company will ensure that all facilities, equipment and devices provided in respect of fire safety will be adequately maintained.

All fire extinguishers will be serviced annually, and fire alarm and emergency light systems will be serviced every six months.

3.15 **Permits to Work**

Certain activities will require a permit to work prior to their being carried out. These activities will generally be identified through risk assessment; however, there are certain activities that Watkin Jones Group always requires a permit to work to be carried out prior to them commencing. These include:

1. Any excavation.
2. Any hot works.
3. Entry into any confined space.
4. Work on live electrical circuits.

See the relevant sections within the Health & Safety Procedures Manual.

3.16 Public Relations

All levels of management are responsible for dealing with and setting up procedures for recording initial inquiries, complaints etc., from the general public.

All communication will be dealt with courteously and expeditiously

3.17 Protection of Young Persons

Watkin Jones Group shall, as an employer, protect any young person (16 – 18 years old) in their employment from risks to health and safety, which may be because of their lack of experience, absence of awareness regarding existing or potential risks, or that they have not yet fully matured. The Company will therefore provide additional supervision of employees within this age range.

Areas where Watkin Jones will not employ a young person for work shall involve:

- Exposure to radiation
- Anything that is beyond the young persons physical or psychological capabilities.
- Exposure to harmful agents, which are toxic or carcinogenic, which cause heritable genetic damage or harm the unborn child, or anything that may chronically affect human health.
- Risk of accidents because the person may not recognize the danger or avoid it due to insufficient attention or lack of experience or training.
- Noise, vibration, extreme heat or cold.

Exceptions may be made concerning young persons 16 – 18 only if:

- It is necessary for their training.
- A competent person will supervise them.

A risk assessment will be carried out prior to employing any young persons & any risk will be reduced to the lowest level reasonably practicable.

3.18 Work at Height

The Company recognizes that work at height is a high-risk activity if suitable control measures are not put in place. The Company will therefore follow the Work at Height Regulations 2005 as a minimum standard.

The Company will:

- Avoid working at height whenever reasonably practicable.

- Use work equipment or other measures to prevent falls where work at height cannot be avoided.
- Use the most suitable work equipment for the task.
- Where the risk of a fall cannot be eliminated, work equipment or other measures will be used to minimize the distance and consequences of a fall should one occur.

Refer to the Company's Work at Height Procedure for detailed information.

3.19 Traffic Management & Pedestrian Segregation

To safeguard pedestrians from mobile plant and equipment on site, prior to the start of each project a traffic management plan will be developed and implemented.

- Where reasonably practicable the vehicle and pedestrian entrances for sites will be separate.
- Where reasonably practicable pedestrian routes will be segregated from vehicle routes on site.
- Where reasonably practicable all vehicles and mobile plant will be capable of all-round vision or under the control of a banksman whilst maneuvering on site.
- All vehicles and mobile plant on site will be fitted with the appropriate hazard warning devices, such as flashing beacons and/or reversing warning alarms.
- When reasonably practicable one-way systems will be used to reduce the need for vehicles/mobile plant to reverse.
- All personnel on site will be required to wear high visibility vest or jacket.

3.20 Foreign Workers

The Company recognizes that there are an increasing number of foreign workers now working on construction sites within the United Kingdom. Not all these foreign workers are fluent English speakers and therefore the Company requires that, where reasonably practicable, all agencies or sub-contractors bringing workers onto its sites who are not fluent in English also provide a translator to be present with them at all times in order that safety instructions and rules are effectively communicated to them. Where reasonably practicable multilingual signage will be provided as appropriate.

The Company reserves the right to carry out audits of eligibility to work in the UK at any of its sites or offices.

3.21 Alcohol & Drugs

The Company forbids anyone working on its construction sites or offices to be under the influence of alcohol or non-prescription drugs or to consume alcohol or non-prescription drugs whilst at work

The Company reserves the right to eject anyone suspected of being under the influence of alcohol or non-prescription drugs from its premises or sites.

The Company requires all drivers and plant operators to have zero levels of alcohol or non-prescription drugs in their system whilst at work.

Any employee found to have consumed or be under the influence of alcohol or non-prescription drugs whilst at work will be subject to disciplinary action. Refer to the company's specific alcohol & drugs policy.

The Company reserves the right to carry out random drug and/or alcohol testing on any worker, working at a Company site or office.

3.22 **Asbestos**

Before carrying out any work in or demolition of an existing building a full Refurbishment/Demolition Survey will be carried out or obtained from the Client. Only competent and licensed contractors will remove asbestos containing materials and a clean air/reoccupation certificate will be required prior to other work continuing in the affected area or building.

If suspected asbestos containing materials are uncovered during a project, work is to cease immediately, the area is to be sealed and locked off and a licensed and competent contractor is to be employed to carry out a survey and have samples sent to an HSE approved laboratory for analysis. Only when it has been confirmed that either there is no asbestos containing materials present or that all asbestos containing materials have been removed and a clean air/reoccupation certificate has been provided can work continue in the area/building.

Where asbestos containing materials are to be left in place, then the site manager must ensure there is adequate protection to the material to prevent damage and release of fibres into the atmosphere. The location must be recorded, and the information communicated to the Principle Designer for inclusion in the Health and Safety File.

Where there is a risk of discovering asbestos containing materials (even if a refurbishment/demolition survey has been carried out and asbestos containing materials already removed) then the rules regarding asbestos and what to do if suspected asbestos containing materials are found is to be added to the specific site induction given to all those working on site.

3.23 **Plant & Equipment**

Lifting Equipment & Accessories

The Company operates inspection records for Lifting Appliances, Lifting Accessories and Tower Cranes. These items of plant and equipment will be inspected daily before use by the authorized competent person on site. Lifting accessories will be thoroughly inspected at least every six months and a color-coded tag will be applied to the item to identify it has been inspected and is fit for use. The slinger/banksman will complete a weekly inspection record for all lifting accessories on site.

Tower cranes will be independently inspected and serviced every three months with a thorough examination every six months, the operator will also record a written inspection report daily/weekly.

Excavators, Forklift Trucks, Dumpers, MEWPs and Ride on Rollers

The Company also operates daily pre-operational and maintenance inspection records for, excavators, forklift trucks, dumpers, MEWPs and ride on rollers.

These inspection records are to be completed by the driver/operator of the forklift truck, dumper or ride on roller only.

All checks should be carried out prior to the start of the day and before starting the plant.

At the end of the week the inspection record is to be forwarded to the Plant Department and a copy maintained on site file.

Wagons

Wagon drivers will complete a daily check of their machine and record it in the duplicate record book.

Other Plant & Equipment

Once accepted on site the item of plant must be inspected visually daily and a weekly inspection recorded on the Small Plant Inspection Register. This record must be sent to the Plant Department weekly and a copy held on site file.

All Plant & Equipment

All plant defects are to be reported to the Plant Department immediately by the Site Manager and all inspection records forwarded to the Plant Department on a weekly basis. Any item of plant or equipment where a defect exists which prevents its safe use is to be taken out of service immediately.

3.24 **Display Screen Equipment**

All workstations will be assessed and analysed. This will include the equipment, furniture, work environment, the work being undertaken and any special needs of the user.

All workstations will meet as a minimum the requirements set out in the schedule to the Health and Safety (Display Screen Equipment) Regulations 1992.

The Company will provide any necessary information and training to ensure employees can use display screen equipment and workstations safely and know how to make best use of it and to avoid health problems.

3.25 **Driving at Work**

The Company operates a Company Car Policy which outlines the requirements of those driving Company Vehicles and those using their own vehicles at work.

Please refer to the Company Car Policy document for full details of the Company's rules and requirements for driving at work.

3.26 **Agile Working**

The Group recognises that flexibility in working patterns is both good for wellbeing in the workforce as well as for productivity.

To allow some flexibility in work patterns then office opening hours will be extended. This will provide flexibility for staff in their start and finish times, as well allow them to avoid peak travel times.

Staff should continue to meet their contractual hours of work.

The Company will ensure that adequate first aid provision is available during the extended office opening hours and that a suitable number of fire marshals are present on site.

Remote/home working may be permitted for some staff. Home workers should meet the following criteria:

- An individual's role enables them to work from home. This should be approved by an individual's line manager. For example: A blended approach to home working will be considered where staff could complete 80% of their work at home and 20% in the office.
- The individual's home environment enables home working, whilst maintaining appropriate health and safety practice.
- Individuals working at home should be able to apply full time and attention for their contracted hours, and within the flexible working guidelines.

The Company will review working arrangements with staff who work remotely to ensure they have an appropriate working environment and workstation when working away from the office.

Refer to the Agile Working Policy for full details.

PART 3
FRESH PROPERTY GROUP



Health & Safety Policy

Document Reference No: FRESHPG HS001

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Fresh Property Group Health and Safety Policy

Ref no	FRESHPG HS001	
Version	1.0	
Supersedes	HS001 – Health and Safety Policy	
Applies to	This policy applies to all employees of Fresh Property Group and their contractors	
Approved by	Fresh Chief Operating Officer	Date: 25/10/2018
Ratified by	Fresh Property Group Senior Management Team	Date: 25/10/2018
Issue date	Oct 2021 Consultation with Staff 24/09/2018 – 25/10/2018	
Review date	May 2021	
Author (s)	Fresh Property Group Head Of Health and Safety	
Custodian	Fresh Chief Operating Officer	
Held by	Fresh Property Group Head Of Health and Safety and is available on the companies TAM system.	
Consultation	In accordance with The Health and Safety (Consultation with Employees) Regulations 1996", this policy was distributed to all staff for consultation on the 27 th Sept 2018; consultation closed on the 25 th Oct 2018 with no comments raised.	

Related legislation and national guidance	<ul style="list-style-type: none"> • Health and Safety at Work etc. Act 1974 • Management of Health and Safety at Work Regulations 1999 • Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 • Control of Substances Hazardous to Health Regulations 2002 HSE (2013) • Health and safety in care homes HSE (2012) L146 (2nd edition). • Health and Safety (Consultation with Employees) Regulations 1996 • Safety Committee and Safety Representatives Regulations 1977 • Manual Handling Operations Regulations 1992 • Lifting Operations and Lifting Equipment Regulations 1998 • Construction (Design and Management) Regulations 2015
Training Requirements	Not required
Monitoring Arrangements	This policy will be monitored by the Head of Health and Safety and all non-conformance brought to the attention of the company SMT. This policy will be reviewed every 3 years or upon substantial changes to the businesses operation.
Implementation	The Chief Operating Officer has the delegated responsibility for the delivery of this policy across the Fresh Property Group.

Health & Safety Policy Statement

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1. Diversity Impact Statement

This Policy has been evaluated for the potential adverse impact it may have on any individual by reason of their ethnic origin (in accordance with the Race Relations (Amendment) Act 2000), disability, gender, sexual orientation, age, belief, marital status, caring responsibilities or chosen working pattern. It is not believed that this policy will have any such adverse impact on staff for any of these reasons.

2. General Introduction

This document outlines the essential elements of Fresh Property Groups (The Company) Health and Safety Management System. It takes account of guidance published by the Health and Safety Executive, relevant British Standards and is consistent with standard laid out in the ANUK Code.

3. Scope

This document will apply to properties and all staff working for or on behalf of the company.

4. Health and Safety Management Processes

The company identifies that in order to meet its statutory obligations, a documented health and safety management system should be implemented within the company. This will also ensure that the company meets its statutory obligations as required by the Management of Health and Safety at Work Regulations 1999.

The company will therefore adopt the HSE recognised health and safety management system detailed in HSG65; this follows the systematic and cyclical

approach of Plan, Do, Check, Act. This section of the policy will document how the company intends to meet the elements required.



4.2 Plan

4.2.1 Policy

The company will implement and maintain a health and safety policy (this document) with an accompanying health and safety statement of intent. The statement of intent will be signed by the Managing Director and adopted by the Company Board. The policy will be displayed in prominent positions across company sites.

The policy will clearly outline the company's health and safety management system and the roles and responsibilities of all Fresh Property Group staff. Those staff members with key health and safety responsibilities will be consulted and given the opportunity to comment prior to the policy being ratified by the company.

The policy will be reviewed periodically to ensure that it remains effective and in accordance with legislation and current standards.

4.2.2 Planning

Health and safety is the responsibility of all personnel within the company. However, it is expected that management at both a strategic and operation level have an additional responsibility for ensuring health and safety is considered as part of all decisions made. These responsibilities are brought to the attention of management and are monitored through objective setting and periodic reviews.

Management will promote a culture of openness that enables all staff to raise health and safety concerns and feel confident that they will be appropriately addressed in a timely manner.

Health and safety objectives are recognised as a keyway of improving performance within any business. The company will set health and safety objectives for both the company as a whole, and individual health and safety objectives for staff. These objectives are to be agreed following a review of the previous year's health and safety performance.

Incidents that result in service limitations can occur within any business, even those with the most resilient and robust systems. These incidents can have a significant effect on our staff, but also those persons who utilise our services. The company will therefore plan for such eventualities and put in place procedures to react, manage and recover to normal operations. These arrangements will be set out in our sites local disaster recovery plans and will give specific instructions to initially manage foreseeable incidents.

4.3 Do

4.3.1 Risk Profiling

A review of all potential health and safety risks will be undertaken at a corporate level so that a health and safety risk profile can be ascertained. This will be a formal document that will be maintained by the company Health and Safety Team and shared throughout the company. The profile will be a live document and reviewed periodically or following any significant incident that may give rise to its suitability.

4.3.2 Organising

A suite of health and safety arrangements will be available to manage and mitigate significant risks identified within the company risk profile. These arrangements will be drafted considering all current legislation and standards and will be reviewed on a periodic basis. In addition to the responsibilities identified in this policy, the arrangement will give additional specific responsibilities to persons within the company.

These arrangements are identified in section 6 of this policy. All arrangements will be available via the company's action management system.

To meet its statutory health and safety obligations the company will appoint specialists to act as their competent persons. They will be either internal to the organisation or provided by external consultants. Where external consultants are appointed, they will be provided access to the company health and safety management system and all required safety documentation.

The company promotes health and safety as being the concern and responsibility of every member of its workforce, it is therefore pertinent that all staff get the opportunity to comment on those activities that may affect their health, safety and wellbeing. The company will therefore ensure that all persons are consulted on health and safety matters.

It has been identified that successful health and safety communication requires both strategical and operational input; the company will implement measures to ensure

that two-way communication exists within the business. This will include ensuring that all health and safety arrangements and policy are effectively communicated and understood throughout the company; safety observations and incidents will be recorded and appropriately actioned to ensure that any good practice or learning is shared.

4.3.3 Implementing

The company values the importance of having a skilled and competent workforce. It will therefore ensure that all persons undergo training to enable them to fulfill their role to the highest standard. All roles will be assessed, and an appropriate training plan implemented to meet company needs. Records of training will be maintained and reviewed on a periodic basis. The Company will monitor its training compliance throughout the year and take appropriate action to ensure that competence is continually maintained.

It is important to the company that our workforce is provided with the tools and equipment to enable them to carry out their duties in the safest way possible. The company will ensure that all equipment and tools are continually maintained and replaced as required. Tools and equipment will be selected in conjunction with the risk assessment process and also take advantage of developments in technology.

Where third party contractors are appointed by the company to work on their behalf, arrangements will be implemented to review and approve their competence prior to works commencing. Where competence cannot be confirmed, company staff will be empowered to challenge and refuse authorisation for works.

4.4 Check

4.4.1 Measuring Performance / Incident and Accident Reporting

A program of general inspection and testing will be undertaken across the company estate. The frequency of these tests and inspections will be outlined within the risk specific arrangements and recorded on the company action management system. A compliance report will be created on a weekly basis for review by management.

The company will appoint an external body to undertake independent health and safety audits of the company's health and safety management system and associated arrangements. These audits will be undertaken at both site and corporate level. A final report will be created, and recommendations produced and presented to the company SMT.

Where remedial action is required following inspections, audits and investigations, a systematic approach will be taken ensure that all actions are recorded, risk assessed, allocated to a responsible person and time bound. All actions will be reported to the appropriate audience at agreed frequencies.

The company will maintain an asset register of all equipment, fixtures and fittings that require a statutory check or inspection as outlined in industry standard SFG20:2017. All checks will be carried out by competent persons or certified professionals where required. This process will be managed by the company's in-

house compliance team and all statutory records will be held centrally and made available to all site management.

The company will implement a system which enable the recording of accidents, incidents, near misses and safety observations. The systems will enable the company to allocate suitable resource to investigate and learn from the data reported. All information will be made available to staff and reported to The Board on a regular basis.

4.5 Act

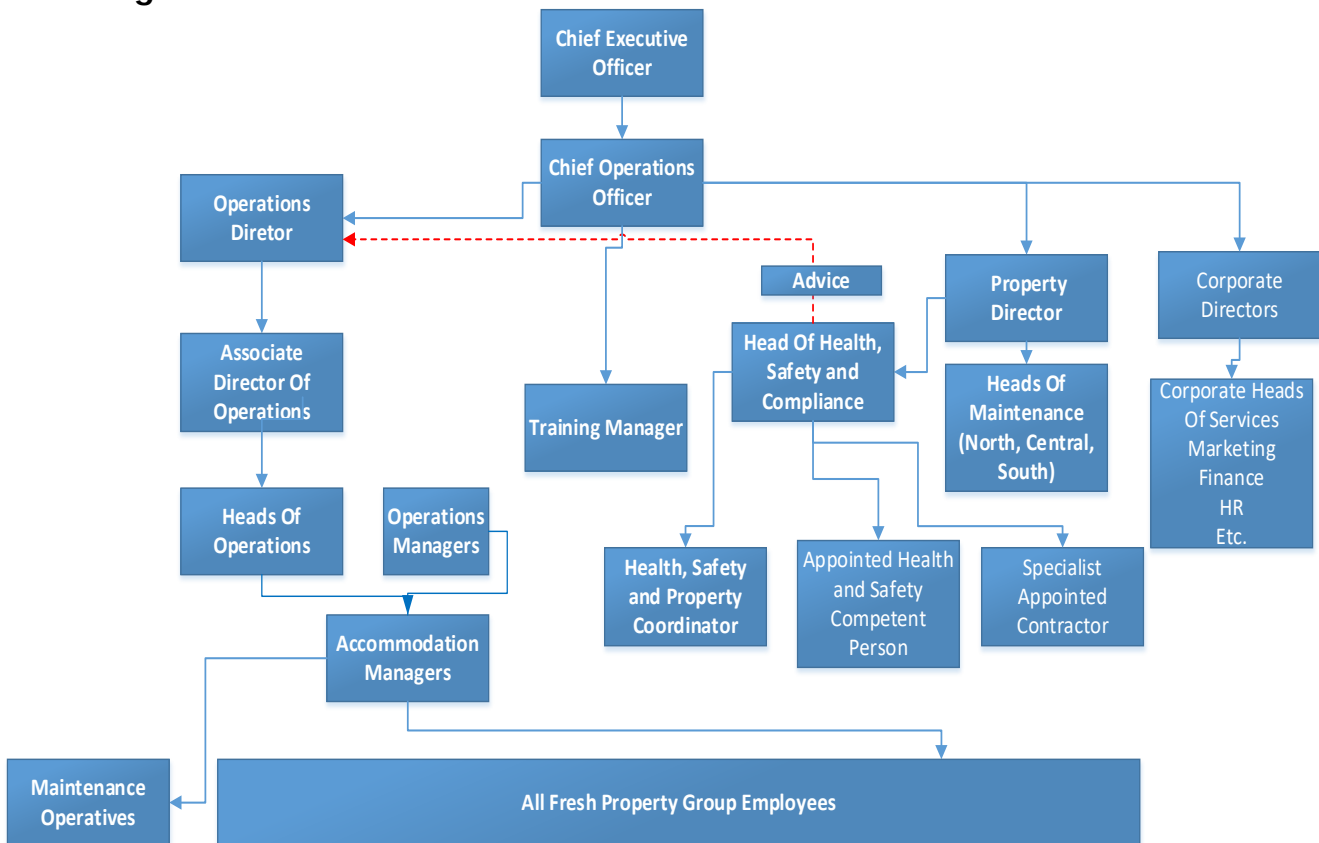
4.5.1 Reviewing Performance / Learning Lessons

The company will implement an annual review of its health and safety management system. This review will be undertaken using an external health and safety consultant who will audit the company's health and safety management system against the HASMAP audit tool.

An annual health and safety report will be produced which will be presented to the board and assist in setting future health and safety objectives.

5. Roles and Responsibilities

5.1 Organisation Chart / Governance



5.2 Responsibilities

5.2.1 Chief Executive Office

The Chief Executive Officer holds the overall accountability for health, safety and welfare

within the company. Whilst this accountability cannot be discharged, the operational responsibility is delegated throughout the company management structure.

5.2.2 Chief Operations Officer

The Chief Operations Officer is the delegated Senior Management Team member with overall health and safety responsibility for the company. They will ensure that a documented health and safety management system is implemented as required of the Management of Health and Safety In the Workplace Regulations 1999 (Reg5).

5.2.3 Director Of Operations

The Operations Director has the overall accountability for the management and implementation of company's health and safety arrangements within the operations team. They will continually seek assurance that health and safety standards are maintained across all services in which they are responsible.

5.2.4 Assistant Director Of Operations

The Associate Director Of Operations delegated accountability for all health and safety responsibilities required of the Operations Team. In addition, they will be specifically responsible for:

- appointing suitable persons to the role of Head of Operations with an appropriate competence to fulfil their health and safety role and that of the Operations Manager and Accommodation Manager;
- allocating suitable resources including time, finance and staffing to the Operations Team to enable them to fulfil their role;
- responsible for any actions in which they are identified within specific safety standards e.g. Fire Safety;
- ensuring that the company's health and safety management system is effectively communicated and implemented;
- responsible for seeking specialist advice for those health and safety issues that are not within their competence or capabilities;
- ensuring that policy and safety standards are effectively communicate to those staff in which they line manage; and
- becoming responsible for the role of Head of Operations in their absence.

5.2.5 Heads of Operations

Heads of Operations are accountable for all health and safety responsibilities required of their Operations Manager and Accommodation Managers. In addition, they will be specifically responsible for:

- appointing suitable persons to the role of Accommodation Manager with an appropriate competence to fulfil their health and safety role;
- allocating suitable resources including time, finance and staffing to their direct reports to enable them to fulfil their health and safety role;
- ensuring that the company's health and safety management system and its objectives and initiatives are effectively communicated and implemented in the operational region for which they are responsible;
- responsible for any actions in which they are identified within specific safety standards e.g. Fire Safety;

- responsible for seeking specialist advice for those health and safety issues that are not within their competence or capabilities;
- promoting a positive culture in the management of health and safety; and
- becoming responsible for the role of the Accommodations Manager in their absence.

5.2.6 Operations Managers

Operations Managers are accountable for all health and safety responsibilities required of the Accommodation Managers under their direct line management. In addition, they will be specifically responsible for:

- Supporting in the appointment of persons to the role of Accommodation Manager with an appropriate competence to fulfil their health and safety role;
- Supporting in allocating suitable resources including time, finance and staffing to their direct reports to enable them to fulfil their health and safety role;
- ensuring that the company's health and safety management system and its objectives and initiatives are effectively communicated and implemented in the operational region for which they are responsible;
- responsible for any actions in which they are identified within specific safety standards e.g. Fire Safety;
- responsible for seeking specialist advice for those health and safety issues that are not within their competence or capabilities;
- promoting a positive culture of the management of health and safety; and
- becoming responsible for the role of Accommodation Manager in their absence.

5.2.7 Accommodation Manager

Accommodation Managers are responsible for the health and safety of all persons that attend, work, or reside on their site. Specifically, they will be responsible for:

- ensuring that the company health and safety management system is implemented on their site and that all staff are made aware of their health and safety responsibilities.
- Where permits are required, they are issued, completed and approved;
- Ensuring that all health and safety tasks, such as TAM reporting is completed and accurately reported within the agreed timescales;
- seeking advice for any health and safety issues that fall outside their competence or knowledge;
- Taking immediate action to isolate any hazard that may arise resulting in significant risk.
- ensuring that their responsibilities identified within specific safety standards e.g. the fire safety, are carried out in full; and
- accountable for all tasks required of the Maintenance Operative at the site.

5.2.8 Property Director

The Property Director is accountable for all responsibilities required of the Property Team. They will ensure that company health and safety management system is implemented within the Property Team. In addition, they will be specifically responsible for:

- ensuring that suitable contractors are appointed to deliver health, safety and property compliance across the company;
- appointing a suitable person to the position of Head of Health, Safety and Compliance / Heads Of Maintenance with the appropriate knowledge and competence to fulfill their role;
- becoming responsible for the role of Head of Health, Safety and Compliance / Head of Maintenance in their absence;
- ensuring that their responsibilities identified within specific safety standards e.g. the fire safety, are carried out in full; and
- allocating suitable resources including time, finance and staffing to the property team to enable them to fulfill their roles;

5.2.9 Head of Health and Safety

The Head of Health, Safety and Compliance is accountable for all actions of the Health, Safety and Compliance Team. In addition, they will be specifically responsible for:

- designing and making available a health and safety management system for the company;
- ensuring that the health and safety management system remains effective and applicable through audit and review;
- ensuring that their responsibilities identified within specific safety standards e.g. the fire safety, are carried out in full;
- providing and/or seeking specialist health and safety advice as required of the company; and
- maintaining and monitoring statutory compliance across the company and advising management of breaches and noncompliance.

5.2.10 Appointed Competent Person (Health and Safety)

To support in meeting its obligations of the Management of Health and Safety in the Workplace Regulations, the company will appoint a specialist contractor to fulfill the role of competent person (Regulation 6).

The contractor will provide specialist health and safety advice to the operations and corporate teams. In addition, they will undertake independent external health and safety audits of all company sites on an annual basis.

The contractor also will manage Fresh PGs electronic Health and Safety Management system ensuring that it remains accurate and update as advised by the Fresh PG Management.

All health and safety requirements will be detailed in the appointing contract.

5.2.11 Specialist Contractor

The company will appoint appropriately qualified specialist contractors to undertake works and assessments which fall outside of the capabilities of those staff employed by the company. The responsibilities of these contractors will be identified within the specific safety standards and supported by procurement instructions and agreed contracts.

5.2.12 Heads of Departments

Heads of Departments are responsible for the delivery of the health and safety

management system within their areas of responsibilities. They will ensure that all matter relating to health and safety are effectively communicated and adhered to by all of their staff.

5.2.13 Employees

All employees are responsible for their own health and safety. They will undertake all duties as directed by the company and not put others at risk through their acts or omissions. Employees have a vital role in the management of health and safety in the workplace and should cooperate with the company on all matters of health and safety concern; these concerns should be brought to the attention of management without delay.

6. Arrangements

As identified within the health and safety management system the following health and safety standards have been developed to give specific direction, responsibilities and instructions to the company and its staff to mitigate and risk. These arrangements will be reviewed, update on a periodic basis.

All safety standards will be made available via the companies Action Management System. A list of these standards can be found in Annex A.

Annex A.

Safety Standards	Location	Owner
HS002 - Accident Safety Standard	TAM	Head Of Health and Safety
HS003 - Asbestos Safety Standard	TAM	Head Of Health and Safety
HS004 - Bomb Threat Safety Standard	TAM	Head Of Health and Safety
HS005 - Working In Confined Spaces Safety Standard	TAM	Head Of Health and Safety
HS006 - COSHH Safety Standard	TAM	Head Of Health and Safety
HS007 - Display Screen Equipment Safety Standard	TAM	Head Of Health and Safety
HS008 - Driving at Work Safety Standard	TAM	Head Of Health and Safety
HS009 - Electricity at Work Safety Standard	TAM	Head Of Health and Safety
HS010 - Fire Safety Standard	TAM	Head Of Health and Safety
HS011 - First Aid Safety Standard	TAM	Head Of Health and Safety
HS012 - Gas Safety Standard	TAM	Head Of Health and Safety
HS013 - Glass and Glazing Safety Standard	TAM	Head Of Health and Safety
HS014 - Ladders and Step Ladders Safety Standard	TAM	Head Of Health and Safety
HS015 - Laundries Safety Standard	TAM	Head Of Health and Safety
HS016 - Legionella Safety Standard	TAM	Head Of Health and Safety
HS017 - Lone Working Safety Standard	TAM	Head Of Health and Safety
HS018 - Manual Handling Safety Standard	TAM	Head Of Health and Safety
HS019 - New and Expectant Mothers Safety Standard	TAM	Head Of Health and Safety
HS020 - Noise Assessment Safety Standard	TAM	Head Of Health and Safety
HS021 - Personnel Protective Equipment Safety Standard	TAM	Head Of Health and Safety

HS022 - Pressure Systems Safety Standard	TAM	Head Of Health and Safety
HS023 – Relationships With Tenants And Students Standard	TAM	Head Of Health and Safety
HS024 - Risk Assessment Safety Standard	TAM	Head Of Health and Safety
HS025 - Swimming Pool Safety Standard	TAM	Head Of Health and Safety
HS026 - Gym Equipment Policy	TAM	Head Of Health and Safety
HS027 - Violence To Staff Policy	TAM	Head Of Health and Safety
HS028 - Visitors Policy	TAM	Head Of Health and Safety
HS029 - Waste Disposal Policy	TAM	Head Of Health and Safety
HS029 - Waste Disposal Policy	TAM	Head Of Health and Safety
HS031 - Working at Height Policy	TAM	Head Of Health and Safety
HS032 - Work Equipment Policy	TAM	Head Of Health and Safety
HS033 - Young Persons Policy	TAM	Head Of Health and Safety