

HEALTH, SAFETY and ENVIRONMENT POLICY





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Table of revisions





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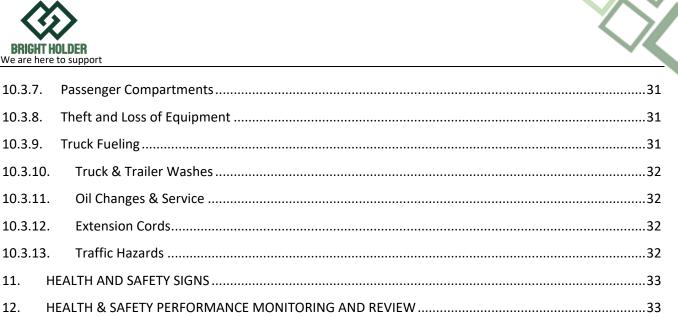


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1. STATEMENT OF POLICY

GENERAL STATEMENT OF HEALTH & SAFETY POLICY

Bright Holder is a safety conscious company which values the effective management of health, safety and welfare throughout all stages of its work. The clear objective is to minimize harm to persons and property by adopting a proactive approach to effective risk and safety management. All work will be carried out in accordance with Best Management Practices (BMP), to the relevant statutory provisions with all reasonably practicable measures being taken to avoid risk to employees and others who may be affected by our work.

Management and supervisory staff have responsibilities for the implementation of the policy and must ensure that health and safety is given adequate consideration in the planning and day-to-day supervision of all work.

Bright Holder will fully comply with the duties placed upon it within the requirements of laws, whilst at all times complying with, as a matter of best practice, the requirements and duties set out within Approved laws of Practice and Guidance as issued by the Health and Safety Executive.

All employees and sub-contractors are expected to co-operate and assist in the implementation of this policy, whilst ensuring that their own works, so far as is reasonably practicable, are carried out without risk to themselves, others or the environment. This includes co-operating with management on any health, safety, welfare or environment related matter.

Employee consultation and participation is a vital part of our policy. Individuals also have duties and are encouraged and expected to co-operate, contribute ideas, suggest improvements, report shortcomings and generally look after the health, safety and welfare of themselves and others.

Bright Holder will take all practical steps to ensure that potential hazards and risks are identified and that suitable and effective preventative and control measures are implemented. The correct safety equipment and personnel protective equipment will be provided to all employees. All employees will be provided with the necessary information, instruction and training in safe methods of work, and the safe and efficient operation and maintenance of tools and equipment.

The Managing Director has the overall responsibility for all Health, Safety, Welfare and Environmental matters. The operation of this policy and the associated procedures will be monitored and reviewed on a regular basis to ensure that they remain current and applicable to the company's activities. This policy has been endorsed by the Managing Director who gives their full support to the implementation of the policy.

Halmat Muhammed Managing Director





2. ORGANIZATION

The effectiveness of the Health and Safety Policy is dependent on the persons who are responsible for ensuring that all aspects of work are carried out with due consideration for safety and with minimum risk to health.

Ultimate responsibility lies with the Directors, but specific duties are delegated to others according to their experience and training.

Company Directors and senior management, both individually and collectively, will ensure that this policy is applied throughout the company and that those employed by the company are kept fully informed of its content.

Managers will ensure that this policy is adopted by all employees, sub-contractors and visitors to any specific site.

Furthermore, every individual person has a duty of care towards themselves and others that they come into contact with, or who may be affected by their actions or omissions, during any part of the working day.

To assist the company in fulfilling its duties and obligations, an external safety advisor may be appointed to provide competent health and safety advice and assistance, in accordance with Regulation 7 of the Management of Health and Safety at Work Regulations 1999, to the management and employees of Bright Holder Company. The contact details will be clearly displayed on the company notice board.

3. HEALTH AND SAFETY OBJECTIVES

The Health and Safety objectives of Bright Holder Company's policy are to:

- Fulfill its responsibilities in terms of Health and Safety legislation
- Provide a safe and healthy place or work for its employees
- Highlight hazardous activities which must be managed
- Ensure the implementation of good practice which minimizes risk, and provides measurable feedback on the operation of the policy in order to provide for continuous improvement.

It is the policy of Bright Holder Company, hereafter referred to as '*The Company*' to ensure the health, safety and welfare of its employees, and that of other persons who could be affected by their undertaking. In accordance with the requirements of the Health and Safety at Work Act, the Management of Health and Safety at Work Regulations, and other applicable legislation, the company will undertake assessments of risks and instigate arrangements that, so far as is reasonably practicable, ensure:

- Places of work are maintained in a safe condition;
- Working environments are safe and without risk to health;
- Work equipment and systems of work are safe and without risk to health;
- Adequate welfare facilities are provided; and
- Information, instruction, training and supervision are provided to ensure the health and safety of its employees and that of persons who may be affected by their work activities.

The company places great importance on ensuring the health safety and welfare of its employees. Managers have a key role in maintaining these standards and should regard their Health and Safety responsibilities towards persons under their direction, with equal importance to that of maintaining customer service levels and profitability.

The effective implementation of this policy will require the co-operation of employees at all levels. All employees are reminded that they have specific legal responsibilities to:-

- Ensure the health and safety of themselves and of any other persons who may be affected by their acts or omissions at work;
- Use equipment in accordance with the instructions and training provided;
- Report any work situation, which is considered to pose a serious threat or danger;
- Co-operate with their employers to comply with any statutory requirement placed upon them;
- Report any matter where it is considered that the safety arrangements in force fail to reduce risk acceptable level.





4. IMPLEMENTATION OF THE POLICY

Whilst overall responsibility for the implementation of the Health and Safety Policy is vested with the Company Directors, responsibility for the day to day application of the policy is delegated to the Director Responsible for Safety.

All individuals are however expected to:

At the implementation stage, full account is to be taken of those factors which help to eliminate injury, damage and waste, and decisions about other priorities (e.g. programme and profit) are to take proper account of health and safety requirements.

Specific and precise arrangements will be developed and implemented, as the case may be, to enable the Policy and Procedures to be implemented. Safe systems of work, incorporating where applicable, safety reviews and hazard identification/risk assessments, are to be established, implemented and monitored so as to ensure appropriate standards of safety at all times.

High standards are to be applied in complying legislation regarding the health and safety of members of staff and others affected by our acts and omissions, proper attention will also be paid to environmental issues.

High standards of cleanliness, hygiene and housekeeping are to be maintained at all times, while safe, adequate and clear means of access and egress to places of work will be provided and maintained.

All members of staff will be provided with appropriate and suitable personnel protective clothing and equipment, appropriate to the work which is to be undertaken. Full training and instruction in the use, maintenance and storage of such equipment will be provided to members of all staff.

Responsibility and accountability in relation to the prevention of accidents, ill health, injuries and damage is to be specified clearly and in writing to all employees.

The Policy is to be explained to all new project members as part of their induction training, before they start work, and a copy of the policy will be made available for reference by any member of staff.

An annual review of the Health and Safety Policy and Procedures Manual will be carried out in conjunction with our safety advisors to ensure that the procedures and controls remain valid and relevant to our work activities. Further reviews may be carried out as and when required. All updates and amendments to the documentation will be circulated to all of the Company's Personnel.

5. HEALTH AND SAFETY RESPONSIBILITIES

5.1. DIRECTOR RESPONSIBLE FOR SAFETY

The Director Responsible for Safety has responsibility for:

- The overall implementation of the company's Health and Safety Policy for the prevention of injury, ill health, damage and wastage.
- Ensuring that adequate financial provisions are made available for the implementation of the policy.
- Ensuring company Directors and Senior Management are aware of their responsibilities and that each administers and promotes with enthusiasm the requirements of this policy throughout the entire company.
- Ensuring that only competent and suitably dressed and protected persons are permitted to carry out Asbestos work, or provide advice to clients on the management of asbestos within non-domestic premises.
- Ensuring that safety directives (new legislation, etc) are conveyed through all management levels.
- Setting a personal example by wearing the appropriate protective clothing and equipment, complying with site rules and ensuring that site managers are made aware of any potentially unsafe conditions or practices which may be encountered.
- Encouraging good safety practice on contracts and to discourage indifferent management by such means as are deemed necessary.
- Showing a clear understanding of their personal responsibilities and duties under the relevant regulations, and to treat the health, safety and welfare of persons under their control as a matter of importance equal to the other functions of the Company Directors.



- Reviewing the company's safety performance and health and safety policy documents to meet with changes in legislation and Company circumstances, and ensuring that it is communicated to all personnel.
- Promoting good working relations with Safety Enforcement Authorities and to strive at all times to achieve compliance with current legislation and best practice.
- Liaising with Health and Safety Executive and other enforcement agencies regarding the company's activities.
- Ensuring that adequate fire precautions are provided at the company's premises and that any flammable liquids or liquefied petroleum gases are stored and used safely in accordance with current legislation.

5.2. COMPANY DIRECTORS

Section/Line Managers have responsibility for:

- Managing and coordinating projects work to comply with this Policy and all current health and safety legislation.
- Familiarizing them with and observing all regulations, acts and Codes of Practice etc. applicable to the project work and surveys being carried out.
- Managing and liaising with project/survey team members and clients, whilst ensuring safe and healthy systems of work are implemented.
- Setting up and maintain good reporting procedures, communications and distribution of information between employees.
- Ensuring the needs for personal and respiratory protective equipment are assessed and that the appropriate selection for specific operations is made, and that all contractors/sub-contractors under the direct control of Bright Holder Company do the same.
- Undertaking Safety Reviews, Hazard Identification/Risk Assessments, Manual Handling Assessments.
- Ensuring safe systems of work are implemented and adhered to at all times.
- Ensuring where appropriate, site emergency plans, are established and implemented.
- Ensuring that all hazardous materials are properly marked, used and stored.
- Accompanying visiting personnel and to take prompt action concerning any complaint or advice received.
- Cooperating with and maintaining good working relationship with appointed safety representatives, safety committees, clients and other safety advisors.
- Investigating all reports made by team members alleging shortfalls of the Company's preventative and/or protective measures in the local workplace and to take action to remedy the situation, as required. Where this cannot be done immediately, to report the facts to the Director with Responsibility together with any suggestions for appropriate action.
- Promoting an interest and enthusiasm for health and safety matters throughout the company and fostering, within the firm, an understanding that injury prevention and occupational hygiene are an integral part of business and operational efficiency.
- Setting a personal example by wearing the appropriate protective clothing and equipment, complying with site rules and ensuring that site managers are made aware of any potentially unsafe conditions or practices which may be encountered.
- Ensuring that the directors, managers and other employees are aware of their responsibilities and that each administers the requirements of this policy.
- Reporting to the Board on all matters relating to safety and training, new safety directives and legislation and seek to establish the company's response. As a result instigate the necessary changes throughout the company.
- Ensuring that any accident resulting in an injury to any person (not just employees) and/or damage to plant, equipment or property is reported in accordance with company policy.
- Cooperating with the company's Health & Safety Advisors and asking for advice before commencing new methods of work or potentially hazardous operations.
- Ensuring that adequate supplies of suitable personal protective clothing and equipment are maintained on site and are made freely available to all employees.

5.3. OFFICE STAFF





Office staff have responsibility for:

- Cooperating with other team members and client personnel.
- Observing all safety regulations at all times.
- Taking reasonable care for the safety and health of themselves, fellow personnel and anyone else who may be affected by their acts or omissions and co-operate with others in the discharge of their duties.
- Reporting any hazards encountered to their Line Manager.
- Reporting any shortcomings in the control measures, to their Line Manager.
- Reporting all accidents and incidents, whether persons are injured or not, and any damage, to their Line Manager.
- Requesting further information about health and safety, where required, by consulting their line manager or the Director Responsible for Safety.
- Reading and understanding the company's Safety Policy and Procedures, and for carrying out all work in accordance with its requirements.
- Not trying to use, repair or maintain any office equipment or machinery for which you have not received full instructions or training. Any defects should be reported immediately to your Line Manager.
- Identifying the position of the First Aid Box, fire fighting equipment and emergency exits. Knowing the procedure in the event of a fire.
- Ensuring that corridors, office floors, doorways, etc are kept clear and free from obstruction at all times.
- Not attempting to lift or move, without assistance, articles or materials so heavy as they are likely to cause injury. Not attempting to reach items on high shelves unless using steps or a properly designed hop-up, they should not improvise or climb.
- Cooperating with the employer on all safety matters.
- Suggesting ways of eliminating hazards and improving working methods.
- Warning new employees, particularly young people, of known hazards and office procedures.

6. HEALTH & SAFETY ARRANGEMENTS

This section details the arrangements and procedures which we will use to help implement our Health and Safety Policy and ensure compliance with current Health and Safety Legislation.

6.1. THE WORKPLACE (HEALTH SAFETY & WELFARE) :

This HSE policy manual covers the working environment, general safety, facilities for washing, eating, changing and good housekeeping.

All work will take into account the requirements of the above regulations.

The company will provide working conditions in accordance with the regulations, in particular:

Temperature

All offices will be maintained at a minimum temperature of 16°C.

Ventilation

All workplaces will be effectively and suitably ventilated with sufficient fresh air, or purified air if natural ventilation is not available.

Lighting

Suitable and sufficient lighting will be provided and, where possible, this will be natural light. In situations where the failure of artificial lighting creates a danger, suitable and sufficient emergency lighting will be provided.

Working Areas

Sufficient space will be provided in the workplace taking into account furniture, fittings, equipment and machinery. Suitable workstations will be provided for each employee according to the nature of the work involved. Floors and traffic routes will be kept free from obstructions at all times.

Effective measures will be taken to prevent persons being struck by falling objects etc.

Wherever possible regularly used and heavy files, boxes etc, will not be stored at high level.





6.2. MANAGEMENT OF HEALTH AND SAFETY AT WORK

The company will, in accordance with the existing regulations, carry out the following activities to provide health and safety for their employees.

- Assess the risks to the health and safety of each employee and of anyone else who may be affected by the work activity. The identification of all foreseeable hazards and risks will enable the necessary preventive and protective control measures to be implemented.
- Each assessment will outline the hazards and risks associated with each working activity and highlight the controls to be instigated to minimize the risks and hazards identified.
- This risk assessment will be recorded and copies issued to all those affected.
- Appoint a competent person(s) to assist in health and safety matters.
- Ensuring that effective arrangements are put in place for the planning, organization, control and monitoring & review of health and safety.
- Develop plans and procedures for dealing with emergencies and for work in dangerous areas.
- Provide adequate information and training, and consultation with employees on health and safety matters
- The company will bring to the attention of the workforce all the necessary precautions detailed within the risk assessment and will monitor the operations to ensure that each operative is acting in accordance with the details outlined in the written assessment.
- The company will make arrangements and/or liaise with contractors for putting into practice all the control measures which have been identified as being necessary in the risk assessment and any associated method statements.
- Emergency procedures will be set up to provide employees with information they can understand concerning health and safety matters.
- The company will co-operate with other sub-contractors sharing the workplace and will ensure that operatives have adequate health and safety training and are capable enough at their jobs to avoid risks.
- Temporary, new and young workers will be given particular health and safety information to meet their special requirements. All operatives have a duty to follow health and safety instructions and report any dangerous aspects.

6.3. FIRST-AID

- All work will be planned to take into account the requirements of the standard firs aid kits availability and properly trained personnel.
- The Project Manager will ensure that the welfare and first-aid requirements are established before work starts or that sub-contractors are notified of their requirement to provide such facilities.
- The Works Supervisor will ensure that all planned welfare and first-aid facilities are provided and that they are maintained to at least the minimum required standards.
- The Project Manager will formally notify any contractor/sub-contractor to whom joint/shared facilities are provided on site.
- A First Aid box is provided in the kitchen/staff welfare area. The contents will be monitored and maintained by the company's Appointed Person for first aid. Vehicle first aid kits are provided in all company vehicles, employees are responsible for maintaining these individually.
- Arrangements may be made for employees to make use of any site first aid arrangements and in such cases the employee will confirm such arrangements prior to starting their work.
- At least one trained first aider (in-date HSE approved course) shall be employed by the company, additional first aiders will be provided in accordance with HSE guidance.





7. HEALTH & SAFETY RISKS

7.1. FIRE SAFETY

Fire precautions will be provided and maintained to the standard requirements.

A fire risk assessment will be completed for each of the companies premises, including any temporary site offices, the fire risk assessment will be regularly reviewed to ensure that it remains valid and that the specified control measures are effective and are being implemented.

Fire extinguishers will be provided and located at strategic points throughout the workplace. Staff will be instructed in the use of office extinguishers in order that they may use them safely and effectively.

The company will enter into a contract service and inspection arrangement to ensure that all portable extinguishers are inspected and maintained.

The names, locations and actions to take in the event of an emergency will be posted at strategic positions throughout the workplace.

FIRE-RETARDENT CLOTHING

Where there is potential danger of a flash fire or explosion (as determined by the site supervisor through completion of a Job Safety Analysis (or equivalent), the following FRC must be worn: All company employees are required to wear Nomex III A, Carhart, Proban, Indura, Ultras of Kermal or Dale Antiflame (which meets the NFPA 2113 Standard) as the outermost layer.

NOTE: No worker shall wear any clothing made of synthetic, nylon or Dacron material; these materials could create static electricity and could potentially contribute to ignition of combustible gases. Additionally, these materials may fuse to the body in a flash fire.

WELFARE FACILITIES

The company shall ensure that adequate welfare facilities (wash rooms, toilets and clean drinking water) are available at all times to both office and mobile staff. Welfare facilities will depend on the location of the work, the nature of the facilities and the duration of the project. Mobile workers should make use of client/public facilities where available and ensure that they maintain a supply of hygiene wipes and drinking water within their vehicles.

7.2. Safe System of Work - Office

The General Manager, (or alternatively a person nominated by the company), will undertake the specific duties outlined earlier in this policy. In summary these include:

- Instigate procedures for the safe evacuation of all offices in the event of emergency
- Ensure this procedure is executed in such an event
- Summon the emergency services when an incident is reported
- All emergency exits checked daily
- Check fire alarms weekly and record the results
- Ensure access and egress are kept free of obstruction
- Ensure fire extinguishers undergo periodic testing and inspection by a qualified engineer

7.3. Safe System of Work - Site

The Works Supervisor will undertake the specific duties outlined earlier in this policy. In summary these include:

- Instigate a procedure for the safe evacuation of all buildings on site in the event of emergency
- Ensure this procedure is executed in such an event
- Summon the emergency services when an incident is reported
- When conditions require, fire extinguishers of a suitable type will be kept on site and adjacent to any activity which may lead to the outbreak of fire





- Instruct site staff in the use of portable fire extinguishers
- Ensure fire extinguishers undergo periodic testing and inspection by a qualified engineer
- If employees are working on a site under the control of a client or principal contractor, they should familiarize themselves with the emergency procedures for that site. This should be achieved through a site safety induction; however, failing this a direct request must be made by the employee to the client/contractor for them to be inducted in the sites emergency procedures.
- Potential fire hazards are to be identified during the desk top study for survey work. For any other work, significant fire hazards are to be noted during contract review.

CONSTRUCTION SITE SAFETY

All employees shall comply fully with the instructions and site rules enforced by the Principal Contractor on construction sites.

All construction site PPE shall be provided by the company (head protection, safety footwear, high visibility clothing and where required eye and hearing protection). The appropriate PPE shall be worn by employees at all times when working on such sites.

When working on or visiting construction sites under the control of the Principal Contractor, the company should receive details of specific risk assessments and site rules. The company shall also provide the Principal Contractor with risk assessments for the its own work, where applicable.

SUITABILITY OF FIRE EXTINGUISHERS

EMERGENCY PROCEDURE:

In the event of fire the following procedure will apply to the office.

- ✓ Raise the alarm and operate the nearest fire alarm
- ✓ Leave the building in an orderly fashion
- ✓ Telephone the nearest Fire Fighting Directorate or Police office.

On hearing the alarm, all employees and visitors to the building are to evacuate and assemble outside the at the identified assembly point where a roll call will be taken. A staff/visitors signing in and signing out procedure will be adopted to ensure that accurate record of all persons present within the building is maintained at all times.

7.4. Electrical Risks

Electrical risks must be assessed and controlled by the use of:

- Statutory inspections and testing of portable electrical appliances by a competent person whether used on sites or within the company's premises.
- 5 yearly statutory inspections and testing of fixed installations, the company having a duty to ensure that the landlord of the premises complies with his duty regarding this matter in order to protect the safety of employees.
- Any power tools used, including drills etc are to be of low voltage type and must be stringently inspected and maintained.
- Prohibition of any employee to access live electrical installations whether on a clients site or within the company's premises. Where such are required to be inspected such as during surveying work, the installation shall be recorded as 'No access'. The exception to such is where the client insists on such areas being inspected and operates a formal permit-to-work system, involving physical isolation, competent supervision, signing off and time limits.

TESTING OF PORTABLE ELECTRICAL EQUIPMENT

Electrical testing of portable electrical equipment for earth/insulation integrity using a portable appliance tester will be carried out by a competent person in addition to the user visual inspections

a) Whenever there is a reason to suppose the equipment may be defective, (but this cannot be confirmed by visual inspection);





b) After any repair, modification or similar work;

c) At regular intervals.

A visual inspection must also be carried out in conjunction with the electrical testing.

Combined inspection and testing should be carried out by someone with a wider degree of competence than that required for visual inspection alone. This is because the results of the tests may require interpretation and appropriate electrical knowledge.

FREQUENCY OF INSPECTION

The initial frequency for inspection/testing suggested by the Health and Safety Executive follows. This frequency can be shortened or lengthened in the light of practical experience i.e. number of faults which appear.

Equipment/Environment		Formal visual inspection	Combined inspection & testing	
Battery-operated (less than 20 volts)		No	No	
Extra low voltage: (less than 50 volts AC) e.g. telephone equipment		No	No	
Information technology e.g. desktop computers, VDU screens		Yes, 2-4	No if double, years insulated, otherwise up to 5 years	
Double insulated equipment: NOT hand-held. Moved occasionally, e.g. fans, table lamps, slide projectors	No	Yes, 2-4 years	No	
Double insulated equipment: HAND-HELD e.g. some floor - 1 year cleaners	Yes	Yes, 6 months – 1 year	No	
Earthed equipment: (Class 1) e.g. electric kettles, some - 1 year floor cleaners	Yes	Yes, 6 months	Yes, 1-2 years	
(a) Cables (leads) and plugs connected to the above equipment and	Yes	Yes, 6 months- 4 years	Yes, 1-5 Years	
(b) Extension leads mains voltage)		depending on the type of equipment	depending on the type of equipment	

Offices and Other Low-Risk Environments

Higher Risk Environments

The HSE suggest that in industry formal visual inspections need to be carried out every 3 months and combined inspection and electrical tests every 6-12 months.

7.5. LONE WORKING

In the event of employees being required to work alone, the following is mandatory:

- Access to contacting assistance (mobile phone or radio device in areas without signal)
- The employee is required to inform his immediate line manager of where he is going and for how long. Details shall also be entered into the office diary which is kept by the administrative staff.
- No employee shall enter a void site alone if there is a significant risk of the site being occupied by unauthorized persons liable to commit acts of violence if disturbed.
- No employee shall enter a void site alone if the state if the premises are unknown and a risk of falling due to unsound structural materials exists.
- Employees are required to call the office on a regular basis to confirm their whereabouts.





7.6. NOISE

All tasks and work activities will be planned and arranged to take the standards into account.

The Project Manager must ensure that information on the noise level of any plant, which it is intended to hire or purchase, is obtained and taken into account before hiring or purchase takes place. He will, in conjunction with any relevant sub-contractor required to use or work near such plant, ensure that any static plant to be installed on site, or in the workshop, is planned to be in a position which takes account of the effects of noise on workers, the general public or the end users of the facility.

Where personnel are required to work in situations where high levels of noise are likely to be encountered, the Project Manager will ensure that full information is obtained on the levels and frequencies of noise. Any measures to reduce noise levels to below levels considered to be safe must be planned or, if this course is not practicable, suitable hearing protection equipment must be identified and provided for use by site personnel.

Regular monitoring of noise levels and frequencies will be planned as required.

Instruction and training will be provided to supervisors and operatives required to work in premises, or with plant, which is likely to result in exposure to high noise levels.

The Works Supervisor will ensure that all plant provided is fitted with silencers, mufflers, doors, canopies etc, and that all equipment and noise reducing doors etc are used. He will ensure that all noise control items fitted to plant, or in premises, are kept in good order and that any defects noted are reported to the responsible immediately.

The Works Supervisor will ensure that supplies of ear defenders, or other hearing protection, are made available for any operations where it is not practicable to reduce the noise level to a safe limit. These will be issued to operatives as required and must be worn at all times when an operative is exposed to noise.

The safe system of work to be adopted whenever noise is a potential problem is:

- Carry out a written noise assessment to establish levels and frequencies of noise for individual items of plant and machinery
- Consider if works can be re-programmed when the noise problem will no longer be present
- Consider alternative methods of working
- Provide suitable noise control mechanisms and personnel protective equipment
- Ensure suitable warning notices are clearly displayed around the affected area
- Regularly monitor noise levels and frequencies
- Give advice on noise control measures

7.7. VIOLENCE AND HARASSMENT

By the nature of the business, employees are required to work in a range of different environments, some of which may pose a risk of verbal abuse and in extreme cases, physical assault. The company is aware of its obligations as per Iraqi rules to ensure both the mental and physical health of employees as affected by systems of work. The risk of such instances is to be controlled by arrangements including:

- Constant supervision by site representatives in high risk areas of sites such as prisons, remand centres or sites occupied by persons suffering from mental health.
- Employees are instructed to diffuse potential hostile attacks by remaining calm, summoning assistance and/or leaving the area when safe to do so.
- Incentives to violent attacks should be reduced by avoiding exposure of valuable items (mobile phones, equipment etc) in public areas as far as possible.
- Any hostile act towards employees, whether verbal or physical, shall be taken seriously and immediately
 reported to the Director Responsible for Safety and recorded as an incident in the accident/incident book.
 These occurrences shall be monitored by the Director Responsible for Safety. Physical assaults shall be
 notified to the HSE.
- Any employee suffering emotional distress due to acts of violence should report this to the management who shall offer counseling and assistance as is necessary.





7.8. DRUGS AND HAZARDOUS SUBSTANCES

The company is aware of its duties to control employees and non-employees exposure to substances hazardous to health. No substance shall be used unless it has been assessed and the risks identified. Factors when determining risks include:

- Type, nature and form of substances being used.
- Quantities involved.
- Potential mechanism of harm (ingestion, skin contact, inhalation etc)
- Individual susceptibility.
- Degree of exposure (duration x concentration).
- Individuals at risk.

HAZARD WARNING SYMBOLS

TOXIC. A substance which if it is inhaled, ingested or allowed to penetrate the skin, may involve serious or chronic health risks and even death.

VERY TOXIC. A substance which if it is inhaled, ingested or allowed to penetrate the skin, may involve extremely serious or chronic health effects and even death

HARMFUL.A substance which if it is inhaled, ingested or allowed to penetrate the skin, may involve limited health risks

IRRITANT. A non-corrosive substance which, through immediate, prolonged or repeated contact with the skin, can cause inflammation.

CORROSIVE.A substance which may on contact with living tissue destroy it.

7.9. Working at Height

Providing people with a suitable work platform for the task being undertaken reduces the risk of injury from falling from machinery and equipment. Often 'safe access' equipment, made available during installation of machinery and/or equipment, is removed after commissioning. Workplace managers may not have considered or recognized the need to provide similar means to gain safe access to parts of machinery and equipment at height, or in awkward locations for maintenance, repair, service or cleaning activities. Safe access at height can be broken into three categories. Each category has in common the need to provide a stable, safe platform suitable for the work to be undertaken, and to be equipped to support and retain a person within the confines of the platform.

- 1. Fixed or permanently installed access platforms:
 - gantries
 - mezzanine floors
 - fixed platforms
 - stairways.
- 2. Mobile elevated work platforms (EWPs):
 - scissor lifts
 - knuckle booms.

Note: Safe work practices must take into account the risk of trapping an operator between the EWP and a fixed structure (e.g. overhead beams, electrical cables, pipes).

7.10. Lifting and Crane Hazards

Cranes are basically used to shift, lift the heavy materials and loads from one place to another.



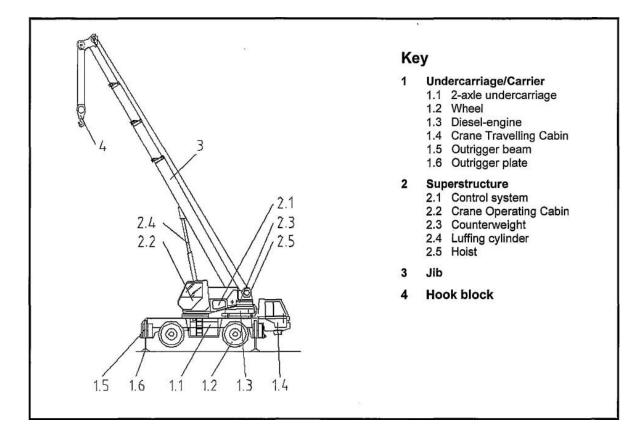


Types of cranes at construction site:

- 1. Crawler crane with a fixed boom
- 2. Telescopic & mobile cranes
- 3. Rough Terrain crain
- 4. Tower Crane
- 5. Floating crane

General parts of crane:

- 1. Outrigger with spreader mates
- 2. Center pin
- 3. Superstructure
- 4. Crane cabin
- 5. Boom
- 6. Main and auxiliary hook
- 7. Anti tube block/limit switch.



Shifting of materials from one place to another place using Crane and Boom truck (Lifting) is a critical work which has the following hazards:

- 1. Falling of load
- 2. Hitting & crushing of a load to existing facilities
- 3. Toppling of Crane
- 4. High wind speed, Poor communication and poor visibility
- 5. Damage to underground utilities of earth





Lifting & Crane safety precautions:

- 1. Soil or ground condition shall be checked and should be leveled.
- 2. Spread mate shall be used size 1:3.
- 3. Outrigger shall be fully extended and at least 1 meter away from manholes and trenches.
- 4. Do not overload, always lift up to SWL (safe working load).
- 5. Crane shall be used up to 75% of its capacity.
- 6. Do not operate crane in high wind and raining conditions.
- 7. Barricade the swinging radius of crane and don't allow unauthorized persons except for trained and certified rigger.
- 8. Rigger should wear a jacket.
- 9. The only rigger can give signal to the crane operators.
- 10. Minimum two tag lines shall be used to control the swinging of load.
- 11. Man entry is not allowable under the suspended load even if he is a rigger.
- 12. Straight, basket, and choker hitch shall be used.
- 13. Crane should have a reverse beep horn.

What are the things we have to check in cranes?

- Hot work permit or lifting permit before starting of job.
- If more than multiple cranes are using risk assessment shall be done.
- Crane third party certificate, validity one year (plate number, validity, any remarks and number of falls).
- Operator third party & license.
- Rigger third party and its validity (one year).
- Safety certificate and fire extinguishers of the crane.
- Crane outriggers and mates.
- Crane computer function.
- Anti tube block/limit switch (it will stop the function of crane hook once it touches and it will prevent from hook from hitting to top boom pulley.
- Lifting appliance like (wire rope sling, webbing sling, D shackle, chain block) third party certificate (validity 6 months) and don't use beyond its SWL.
- Damage and expired lifting tools and tackles shall not be used.
- Safety latch of a main and auxiliary hook.
- A hydraulic leak of oil.
- The cabin of crane shall be free from blind spot.
- PPE of working crew especially leather gloves for rigger and safety harness.

8. WORKING ENVIRONMENT

The company shall ensure a safe and comfortable working environment for all employees. The thermal environment in premises controlled by the company shall be maintained within a comfortable range, windows and heaters being under the direct control of the occupants. Where site-based employees are required to work in the open air, suitable personal protective equipment(PPE) shall be provided to ensure personal comfort, warmth and dryness., the PPE kit includes:

- safety glasses
- gloves
- lab coats
- boots
- safety shoes
- respiratory protective gear such as filter masks and self-contained breathing apparatus
- fire resistant clothing
- chemical resistant clothing
- sleeves that protect against cuts
- chaps





• ear plugs

8.1. PERSONAL PROTECTIVE EQUIPMENT (PPE)

The requirement to use appropriate PPE is a legal obligation for all workers and must be worn at all worksites. Workers are to be protected from workplace hazards. When the hazard cannot be eliminated or controlled by other means, such as engineering controls or administrative controls then the use of personal protective clothing is required. Workers must use and wear properly, the appropriate PPE in accordance with the training and instruction outlined below, inspect the PPE equipment before using it, and not use PPE that is unable to perform the function for which it is designed. The use of PPE must not itself endanger the worker such as a face shield covered with dirt and debris may affect a worker's ability to see clearly.

Workers are responsible for the supply, proper fitting, cleaning and replacement of their own basic PPE as listed below. You must inspect your PPE periodically and replace it as necessary. Workers must wear PPE at all work locations shop area, Company yards, client property and leases.

<u>Note</u>: Equipment which exhibits intermittent faults eg sometimes it works, next time it doesn't, must be taken out of service and not used again until thoroughly checked out by a competent person and the source of the fault identified and rectified.

8.1.1. FOOT PROTECTION

Workers exposed to foot hazards must wear foot protection. All safety footwear is to be worn at all loading and off-loading locations and when performing duties at all worksites. Shoe laces must be in good condition and all footwear must be kept clean on the bottom to prevent slips and falls. Work Boots must be worn at all jobsites regardless of exposure. Note: short ankle height boots are NOT acceptable foot protection

8.1.2. H2S PPE

All workers entering sour gas work sites must be trained in H2S PPE. (when and where to use PPE, the hazards associated with PPE, proper fitting requirements of PPE and cleaning, replacement, care and maintenance of PPE). This training shall take place upon hire.

8.1.3. HAND PROTECTION

Suitable mitts or gloves must be worn to protect the hands against hazards from sharp or jagged material, skin irritants and extremes in temperature. In some cases, safety impact gloves are required and must be worn. Replace worn hand protection as necessary. Gloves must be worn at all jobsites.

8.1.4. HEAD PROTECTION

CSA Standard Z94.1-92 or ANSI Standards Z89.1-1997 and Z89.1-2003 Hard Hats (Class E) must be worn at all times outside vehicles and offices. Hardhats must be side impact CSA Class B rated CSA Standard Z94.1 – 1998, non-conducting and high impact plastic. Metal hard hats or those which have been altered or damaged may not be worn. Hard hats must be worn in the way they were intended ... with the brim to the front. Clean hardhat periodically with a damp cloth. Workers exposed to head hazards must wear head protection. *Hard hats are to be worn at all jobsites regardless of exposure*

8.1.5. HEARING PROTECTION

Bright Holder Company ensures that all reasonably practicable measures are used to reduce the noise to which workers are exposed in areas of a work site where workers may be present. Onsite workers may have no control over the noise source. In this case abide by the contractor's signage or wear hearing protection such as CSA Standard Z94.2-02, disposable ear plugs (single use, ensure proper installation) at all times where the noise level exceeds 85 db. In-house training is provided to all operational employees and instruction for use is included on packaging. Hearing protection should also be worn in the vicinity of hydro vac units, vacuum truck. Store hearing protection in a plastic bag in your vehicle for quick access when required. Replace ear protection as necessary. Written n-house training on hazards associated with exposure to high levels of sound and the fit, care and use of





hearing protectors.

8.1.6. REFLECTIVE VESTS

Reflective Vest or Reflective Marked Coveralls must be worn at all worksites and when flagging traffic.

8.2. INSPECTION

All users must look critically at the electrical equipment they use from time to time. This needs to be daily in the case of hand held and hand operated appliances to check that the equipment is in sound condition (remember to unplug and switch off first!!).

Checks must be made for:

- Damage, e.g. cuts, abrasion (apart from light scuffing) to the cable covering;
- Damage to plug, e.g. the casing is cracked or the pins are bent;
- Non-standard joints including taped joints in the cable;
- The outer covering (sheath) of the cable not being gripped where it enters the plug or the equipment. (Look to see if the coloured insulation of the internal wires is showing);
- Equipment that has been used in conditions where it is not suitable, e.g. a wet or dusty workplace;
- Damage to the outer cover of the equipment or obvious loose parts or screws;
- Signs of overheating (burn marks or staining).
- The checks also apply to extension leads, associated plugs and sockets. Any faults must be reported to 'the Director Responsible for Safety and the equipment taken out of use immediately and labeled as faulty (and why). It must not be used again until repaired.

8.3. Safety Driving Policy

The Commercial Vehicle Maintenance states that the carrier must establish maintain and follow a written maintenance and inspection program that pertains to all applicable vehicles and equipment registered to the carrier in KRG. Individual vehicle files must be retained for the current calendar year and the preceding four years. If a vehicle is sold, the file on the vehicle must be retained for at least six months after the sale.

All records must be located at the carrier's principal place of business in KRG. The policies and procedures set out in the maintenance program must provide for continuous and regular inspections that meet the following requirements:

- Records of all inspection, repairs, lubrication and maintenance (with each record displaying the nature of the inspection, the date and the odometer reading).
- The unit number serial number, year of manufacture, make of each vehicle.
- The size of tires used on each vehicle.
- Any modification affecting the gross vehicle weight of each vehicle.
- Notice of defects received from manufacturer and subsequent corrective work done.

This policy applies to all staff authorized to operate company commercial vehicles. This includes company drivers, lease operators, management, maintenance staff, swampers and administration.

The Company recognizes driving as the predominant hazard in our industry. Pulling of driver abstracts, training programs and effective closure of motor vehicle incidents aremeans that the Company takes to manage driving risks.

Worker's shall operate vehicles in a safe and legal manner and use vehicles only for the purposes for which they are designed and in such a manner that other tasks will not interfere with the effective care and control of the vehicle. Workers charged with traffic and/or other infractions (such as use of electronic devices) while driving will be responsible for paying any fines, penalties and or associated costs. Workers involved in a collision with company vehicles will be subject to investigation including adherence to this practice and disciplinary action will be taken. Workers could also be charged under applicable laws including dangerous driving, careless or reckless driving and criminal negligence causing death or injury.

The Company has established the following rules for all drivers to improve safety on the roads:





What employers/passengers should do?

1. <u>Prevent driver sleepiness</u>

One of the most important things employers/passengers must do is ensure that their drivers are not at risk of falling asleep at the wheel. Thousands of crashes are caused by tired drivers. They are most likely to happen:

- on long journeys on monotonous roads, such as motorways
- between 2am and 6am
- between 2pm and 4pm (especially after eating, or taking even one alcoholic drink)
- after having less sleep than normal
- after drinking alcohol
- if taking medicines that cause drowsiness
- after long working hours or on journeys home after long shifts, especially night shifts

2. <u>Raise awareness</u>

As part of recruitment, training and staff appraisal, ensure that drivers and line managers are reminded about:

- the danger of falling asleep at the wheel
- the need for safe journey planning
- the need to get adequate sleep before starting to drive
- the dangers of 'moonlighting' or spending too long on evening hobbies, social activities or domestic work that limit sleeping time
- the times of day when sleepiness is most common
- the early signs of fatigue and what to do if they begin to feel tired during a journey
- the tendency to sleepiness associated with ageing and certain medical conditions
- the risks of making a lengthy home journey after a day's work away from their normal base
- how to organize shifts and workloads to reduce the risk of driving tired
- the organization's policy on what staff should do if they feel fatigued before or whilst driving

3. <u>Use safer alternatives</u>

Where possible, use remote communications such as telephone, email or video-conferencing as a substitute for road journeys or use other means of transportation if applicable, which should be safer and more environmentally-friendly. If road travel is unavoidable, maximize car sharing to reduce the number of journeys. Also, sharing driving can reduce the length of time spent at the wheel.

4. <u>Plan Routes</u>

Every journey should be a managed journey. Require those responsible for journey planning (line managers or drivers themselves) to plan journeys, taking account of road type (for example, accident rates are lowest on motorways and dual carriageways), hazards (road works, accident 'hot spots'), traffic densities (time journeys to avoid peak traffic hours) and high-risk features such as schools or busy shopping centres.

If using a Navigation system, drivers should input their destination before setting off, and if they need to change it, stop in a safe place to do so.

Plan where to stop for regular rest breaks (every two hours - or sooner if feeling tired - for at least 15 to 20 minutes). If possible plan an alternative route to avoid any major delays.

5. <u>Reduce distances</u>

Although the distances between major cities inside Kurdistan is not so long, however it is recommended to set indicative in-house limits on maximum driving distances per day, per week, per month and per year. When requiring employees to drive to and from a location to carry out a work task, set reasonable maximum mileages which drivers should not be expected to exceed in a single day. Support this with clear policies that allow staff to take overnight stops, or ensure the driving can be shared.





6. Control drivers' hours

Set in-house limits for unbroken driving hours, including daily, weekly and monthly limits for all classes of drivers. As a working rule, no driver should be required to drive continuously for more than 2 hours without at least a 15 minute break. The drivers' hours rules for professional drivers are the statutory maximum. Breaks and break locations should be planned for in advance of starting journeys.

7. Optimize schedules

Ensure that journey scheduling allows sufficient time for drivers to take account of reasonably foreseeable weather and traffic conditions and to comply with speed limits. Schedules should seek to reduce night driving and avoid those times of day mentioned above when falling asleep at the wheel is more likely. Payment by customer contact or 'job and finish' regimes must not encourage drivers to disregard road traffic law or the organization's own driving rules, standards and policies.

8. Overnight stays

Where employees have to travel a long distance to a work location at the beginning of the day or the journey is likely to take more than two hours, consider asking staff to travel the night before and stay overnight. Similarly, at the end of a work period at a remote location employers should make provision for employees to stay overnight so that they do not have to drive a long distance home when tired.

Also be aware that some employees may prefer to avoid overnight stays, for example, for domestic reasons, so check work schedule sand journey plans to ensure they are not tempted to undertake long journeys when they are likely to be too tired. If they do not wish to stay away overnight look at work scheduling to see if it is possible for them to get home safely by other means.

9. <u>Review shift arrangements</u>

Night shifts and rotating shifts can cause severe sleep disruption. Workers on 12-hour shifts (compared to eight hours) are significantly sleepier at the end of their shift, especially at 7.00 a.m. Review shift arrangements to see that these do not lead employees to drive while fatigued. Where problems are identified, including increased risk during commuting, consider providing safer, alternative transport.

10. Promote safe driving

Develop policies, advice and training for line managers and drivers:

- **Safe speeds:** Ensure drivers understand the need to stay within speed limits and that working practices, such as schedules, do not encourage speeding.
- **Distraction:** Don't expect drivers to make or take phone calls, send messages or transact business whilst driving. Stipulate that these activities must only be done when parked.
- **Sleep:** Remind employees of the importance of having adequate good quality sleep before driving. Rest is not a substitute for sleep.
- **Caff napping:** Remind employees of the value of taking caffeine and having a short, 15 minutes (but no longer) nap as a way of coping with the onset of tiredness. This is an emergency measure to complete a journey safely and should not be used more than once during a journey.
- Impairment: Provide advice on avoiding drink and drug (including prescription and over-the counter medicines) driving, and on fitness to drive (eyesight, illness.
- **Journey planning:** give staff written advice; to implement the conditions above for their journey and plan for the journey hours before it happens.
- **Raising concerns:** Encourage drivers to raise concerns with their line manager, and line managers to respond positively. Be aware that some staff, especially younger employees or those new to the company, may not feel able to raise concerns for fear of jeopardizing their relationship with the company or their manager
- Incident procedures: staff should know what to do and whom to contact in the event of an incident/emergency. Staff who travel alone or for long distances should have access to a mobile phone, but be advised on its safe use.





Avoid driving in adverse conditions

Actively discourage driving at night and in adverse weather conditions, particularly fog, very high winds, ice, snow or flooding or where there is a danger of drivers becoming stranded in remote locations. Ensure your staff feel able to postpone journeys or change routes if the police and travel organizations advise against road travel due to weather conditions, and that they know your organization's reporting procedures in such instances.

Also consider what emergency equipment should be carried in the vehicle in case the driver gets stranded.

8.3.1. Speeding & Parking

Workers are expected to adhere to all traffic laws and to drive safely and courteously. All signs governing the movement and parking of vehicles on any work site shall be observed. All speeding tickets will be paid by the worker.

8.3.2. Seat Belts

3 point inertia reel type seat belts shall be worn by all workers. It's the law ... fasten your seatbelt.

8.3.3. Drug & Alcohol Use

A worker shall not use, possess or offer for sale alcohol and drugs or any product while operating a company vehicle or equipment, on company property or at a company workplace/site. A worker shall not use, possess or offer for sale alcohol and drugs or any product or device that may be used to attempt to tamper with a sample for a drug and alcohol test while on company property or at a company workplace (see Alcohol & Drug Policy for more detail).

8.3.4. Licenses & Experience

All drivers of company vehicles, or vehicles used on company business, shall possess a valid driver's license for the class of vehicle being driven, have a minimum of 5 years driving experience in the vehicle they are assigned and have 6 demerits or less.

8.3.5. Parking

Back-in parking is the standard on most worksites. Where backing up is required, drivers, when parking, should make every effort to park the vehicle in a manner that allows the first move when leaving the parking space to be forward.

8.3.6. Backing Up

Backing up is extremely hazardous. Company policy prohibits backing whenever practicable unless you have a backup alarm, **use a spotter** or walk around the truck/trailer prior to backing.

8.3.7. Passenger Compartments

Passenger compartments are to be free from loose objects that might endanger occupants in the event of an accident.

8.3.8. Theft and Loss of Equipment

As a driver you are required to maintain all equipment that you have been assigned according to manufacturer's specifications. Theft of chains, straps, etc. is an expensive problem - it is your responsibility to secure these items and to replace any items lost, misplaced or stolen.

8.3.9. Truck Fueling





Drivers will be given company fuel cards to purchase fuel for trucks. Only **diesel fuel, gasoline fuel & oil** for trucks are to be purchased with these cards. *Reminder: Do not smoke when fueling.*

8.3.10. Truck & Trailer Washes

If possible wash your truck and trailer in the front yard. Also, a charge account at Leduc Car Wash is available for both companies (Bright Holder Company). Trucks and trailers should be kept in clean condition at all times.

8.3.11. Oil Changes & Service

Drivers are to monitor oil change due dates. Trucks, on warranty, will be serviced at Jiffy Lube (small trucks) and Kenworth (big trucks). Trucks no longer covered by warranty will be serviced in-shop (at mechanics discretion). Either way ... oil changes need to be booked by the driver.

8.3.12. Extension Cords

Each unit is assigned an extension cord for plugging in during winter months. It is the driver's responsibility to ensure the cord is kept with the truck at all times so it is not lost, stolen or damaged.

8.3.13. Traffic Hazards

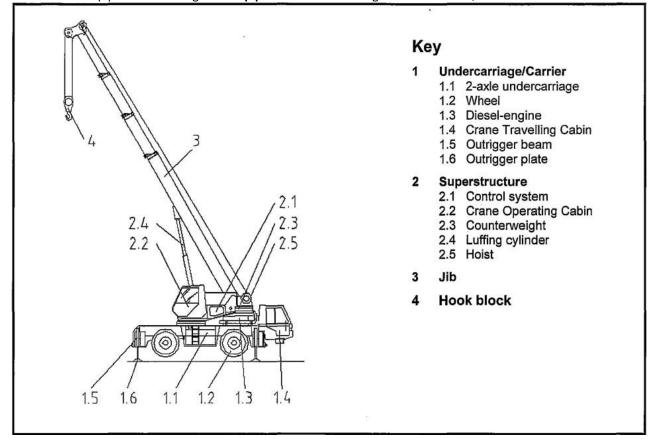
Drivers at worksites may assist with the positioning, loading or unloading cargo or equipment in high traffic areas. Where no other means of eliminating hazards is available the use of PPE is essential. Workers on foot and exposed to the hazards of moving vehicles are required to wear highly visible apparel that is clearly distinguishable, such as reflective vests. For optimal performance, apparel should be kept clean and worn as intended – done up properly around the body with no loose or dangling parts, and worn in a way that ensures that no other clothing or equipment obscures the high visibility materials.





9. HEALTH AND SAFETY SIGNS

The company ensures that Safety Signs and Signals are provided and maintained where there is significant risk to health and safety that has not been avoided or controlled by other means (e.g. safe systems of work) provided that the use of a sign can help reduce the risk. We will also ensure that, when necessary, the **road traffic signs** in workplaces to regulate road traffic and pipe work markings where **pipe work** contains dangerous substances; would be used.



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This policy applies to all staff authorized to operate company commercial vehicles. This includes company drivers, lease operators, management, maintenance staff, swampers and administration.

The Company recognizes driving as the predominant hazard in our industry. Pulling of driver abstracts, training programs and effective closure of motor vehicle incidents aremeans that the Company takes to manage driving risks.

Worker's shall operate vehicles in a safe and legal manner and use vehicles only for the purposes for which they are designed and in such a manner that other tasks will not interfere with the effective care and control of the vehicle. Workers charged with traffic and/or other infractions (such as use of electronic devices) while driving will be responsible for paying any fines, penalties and or associated costs. Workers involved in a collision with company vehicles will be subject to investigation including adherence to this practice and disciplinary action will be taken. Workers could also be charged under applicable laws including dangerous driving, careless or reckless driving and criminal negligence causing death or injury.





The Company has established the following rules for all drivers to improve safety on the roads:

What employers/passengers should do?

11. Prevent driver sleepiness

One of the most important things employers/passengers must do is ensure that their drivers are not at risk of falling asleep at the wheel. Thousands of crashes are caused by tired drivers. They are most likely to happen:

- on long journeys on monotonous roads, such as motorways
- between 2am and 6am
- between 2pm and 4pm (especially after eating, or taking even one alcoholic drink)
- after having less sleep than normal
- after drinking alcohol
- if taking medicines that cause drowsiness
- after long working hours or on journeys home after long shifts, especially night shifts

12. Raise awareness

As part of recruitment, training and staff appraisal, ensure that drivers and line managers are reminded about:

- the danger of falling asleep at the wheel
- the need for safe journey planning
- the need to get adequate sleep before starting to drive
- the dangers of 'moonlighting' or spending too long on evening hobbies, social activities or domestic work that limit sleeping time
- the times of day when sleepiness is most common
- the early signs of fatigue and what to do if they begin to feel tired during a journey
- the tendency to sleepiness associated with ageing and certain medical conditions
- the risks of making a lengthy home journey after a day's work away from their normal base
- how to organize shifts and workloads to reduce the risk of driving tired
- the organization's policy on what staff should do if they feel fatigued before or whilst driving

13. Use safer alternatives

Where possible, use remote communications such as telephone, email or video-conferencing as a substitute for road journeys or use other means of transportation if applicable, which should be safer and more environmentally-friendly. If road travel is unavoidable, maximize car sharing to reduce the number of journeys. Also, sharing driving can reduce the length of time spent at the wheel.

14. Plan Routes

Every journey should be a managed journey. Require those responsible for journey planning (line managers or drivers themselves) to plan journeys, taking account of road type (for example, accident rates are lowest on motorways and dual carriageways), hazards (road works, accident 'hot spots'), traffic densities (time journeys to avoid peak traffic hours) and high-risk features such as schools or busy shopping centres.

If using a Navigation system, drivers should input their destination before setting off, and if they need to change it, stop in a safe place to do so.

Plan where to stop for regular rest breaks (every two hours - or sooner if feeling tired - for at least 15 to 20 minutes). If possible plan an alternative route to avoid any major delays.

15. <u>Reduce distances</u>

Although the distances between major cities inside Kurdistan is not so long, however it is recommended to set indicative in-house limits on maximum driving distances per day, per week, per month and per year. When requiring employees to drive to and from a location to carry out a work task, set reasonable maximum mileages which drivers should not be expected to exceed in a single day. Support this with clear policies that allow staff to take overnight stops, or ensure the driving can be shared.





16. Control drivers' hours

Set in-house limits for unbroken driving hours, including daily, weekly and monthly limits for all classes of drivers. As a working rule, no driver should be required to drive continuously for more than 2 hours without at least a 15 minute break. The drivers' hours rules for professional drivers are the statutory maximum. Breaks and break locations should be planned for in advance of starting journeys.

17. Optimize schedules

Ensure that journey scheduling allows sufficient time for drivers to take account of reasonably foreseeable weather and traffic conditions and to comply with speed limits. Schedules should seek to reduce night driving and avoid those times of day mentioned above when falling asleep at the wheel is more likely. Payment by customer contact or 'job and finish' regimes must not encourage drivers to disregard road traffic law or the organization's own driving rules, standards and policies.

18. Overnight stays

Where employees have to travel a long distance to a work location at the beginning of the day or the journey is likely to take more than two hours, consider asking staff to travel the night before and stay overnight. Similarly, at the end of a work period at a remote location employers should make provision for employees to stay overnight so that they do not have to drive a long distance home when tired.

Also be aware that some employees may prefer to avoid overnight stays, for example, for domestic reasons, so check work schedule sand journey plans to ensure they are not tempted to undertake long journeys when they are likely to be too tired. If they do not wish to stay away overnight look at work scheduling to see if it is possible for them to get home safely by other means.

19. <u>Review shift arrangements</u>

Night shifts and rotating shifts can cause severe sleep disruption. Workers on 12-hour shifts (compared to eight hours) are significantly sleepier at the end of their shift, especially at 7.00 a.m. Review shift arrangements to see that these do not lead employees to drive while fatigued. Where problems are identified, including increased risk during commuting, consider providing safer, alternative transport.

20. Promote safe driving

Develop policies, advice and training for line managers and drivers:

- **Safe speeds:** Ensure drivers understand the need to stay within speed limits and that working practices, such as schedules, do not encourage speeding.
- **Distraction:** Don't expect drivers to make or take phone calls, send messages or transact business whilst driving. Stipulate that these activities must only be done when parked.
- **Sleep:** Remind employees of the importance of having adequate good quality sleep before driving. Rest is not a substitute for sleep.
- **Caff napping:** Remind employees of the value of taking caffeine and having a short, 15 minutes (but no longer) nap as a way of coping with the onset of tiredness. This is an emergency measure to complete a journey safely and should not be used more than once during a journey.
- Impairment: Provide advice on avoiding drink and drug (including prescription and over-the counter medicines) driving, and on fitness to drive (eyesight, illness.
- **Journey planning:** give staff written advice; to implement the conditions above for their journey and plan for the journey hours before it happens.
- **Raising concerns:** Encourage drivers to raise concerns with their line manager, and line managers to respond positively. Be aware that some staff, especially younger employees or those new to the company, may not feel able to raise concerns for fear of jeopardizing their relationship with the company or their manager
- Incident procedures: staff should know what to do and whom to contact in the event of an incident/emergency. Staff who travel alone or for long distances should have access to a mobile phone, but be advised on its safe use.





Avoid driving in adverse conditions

Actively discourage driving at night and in adverse weather conditions, particularly fog, very high winds, ice, snow or flooding or where there is a danger of drivers becoming stranded in remote locations. Ensure your staff feel able to postpone journeys or change routes if the police and travel organizations advise against road travel due to weather conditions, and that they know your organization's reporting procedures in such instances.

Also consider what emergency equipment should be carried in the vehicle in case the driver gets stranded.

10.3.1. Speeding & Parking

Workers are expected to adhere to all traffic laws and to drive safely and courteously. All signs governing the movement and parking of vehicles on any work site shall be observed. All speeding tickets will be paid by the worker.

10.3.2. Seat Belts

3 point inertia reel type seat belts shall be worn by all workers. It's the law ... fasten your seatbelt.

10.3.3. Drug & Alcohol Use

A worker shall not use, possess or offer for sale alcohol and drugs or any product while operating a company vehicle or equipment, on company property or at a company workplace/site. A worker shall not use, possess or offer for sale alcohol and drugs or any product or device that may be used to attempt to tamper with a sample for a drug and alcohol test while on company property or at a company workplace (see Alcohol & Drug Policy for more detail).

10.3.4. Licenses & Experience

All drivers of company vehicles, or vehicles used on company business, shall possess a valid driver's license for the class of vehicle being driven, have a minimum of 5 years driving experience in the vehicle they are assigned and have 6 demerits or less.

10.3.5. Parking

Back-in parking is the standard on most worksites. Where backing up is required, drivers, when parking, should make every effort to park the vehicle in a manner that allows the first move when leaving the parking space to be forward.

10.3.6. Backing Up

Backing up is extremely hazardous. Company policy prohibits backing whenever practicable unless you have a backup alarm, use a spotter or walk around the truck/trailer prior to backing.

10.3.7. Passenger Compartments

Passenger compartments are to be free from loose objects that might endanger occupants in the event of an accident.

10.3.8. Theft and Loss of Equipment

As a driver you are required to maintain all equipment that you have been assigned according to manufacturer's specifications. Theft of chains, straps, etc. is an expensive problem - it is your responsibility to secure these items and to replace any items lost, misplaced or stolen.

10.3.9. Truck Fueling





Drivers will be given company fuel cards to purchase fuel for trucks. Only **diesel fuel, gasoline fuel & oil** for trucks are to be purchased with these cards. *Reminder: Do not smoke when fueling.*

10.3.10. Truck & Trailer Washes

If possible wash your truck and trailer in the front yard. Also, a charge account at Leduc Car Wash is available for both companies (Bright Holder Company). Trucks and trailers should be kept in clean condition at all times.

10.3.11. Oil Changes & Service

Drivers are to monitor oil change due dates. Trucks, on warranty, will be serviced at Jiffy Lube (small trucks) and Kenworth (big trucks). Trucks no longer covered by warranty will be serviced in-shop (at mechanics discretion). Either way ... oil changes need to be booked by the driver.

10.3.12. Extension Cords

Each unit is assigned an extension cord for plugging in during winter months. It is the driver's responsibility to ensure the cord is kept with the truck at all times so it is not lost, stolen or damaged.

10.3.13. Traffic Hazards

Drivers at worksites may assist with the positioning, loading or unloading cargo or equipment in high traffic areas. Where no other means of eliminating hazards is available the use of PPE is essential. Workers on foot and exposed to the hazards of moving vehicles are required to wear highly visible apparel that is clearly distinguishable, such as reflective vests. For optimal performance, apparel should be kept clean and worn as intended – done up properly around the body with no loose or dangling parts, and worn in a way that ensures that no other clothing or equipment obscures the high visibility materials.





11.HEALTH AND SAFETY SIGNS

The company ensures that Safety Signs and Signals are provided and maintained where there is significant risk to health and safety that has not been avoided or controlled by other means (e.g. safe systems of work) provided that the use of a sign can help reduce the risk. We will also ensure that, when necessary, the **road traffic signs** in workplaces to regulate road traffic and pipe work markings where **pipe work** contains dangerous substances; would be used. Health and Safety Signs normally consist of the follows types of signs:

Colour	Meaning/ Purpose	Instruction & Information	Intrinsic Features	Example
RED	Prohibition/ Danger	Dangerous behaviour; stop; shutdown; emergency cut- out devices; evacuate	Round shape; black pictogram on white background; red edging and diagonal line; red part to be at least 35% of the area of the sign	
YELLOW	Warning	Be careful; take precautions; examine	Triangular shape; black pictogram on yellow background with black edging; yellow part to be at least 50% of the area of the sign	
BLUE	Mandatory	Specific behaviour or action e.g. wear personal protective equipment	Round shape; white pictogram on blue background; blue part to be at least 50% of the area of the sign	
GREEN	Emergency escape; first aid. No danger	Doors; exits; escape routes equipment and facilities Return to normal	Rectangular or square shape; white pictogram on green background; green part to be at least 50% of the area of the sign	一 齐
RED	Fire fighting equipment	Identification & location	Rectangular or square shape; white pictogram on red background; red part to be at least 50% of the area of the sign	

12.HEALTH & SAFETY PERFORMANCE MONITORING AND REVIEW

The Director Responsible for Safety and the company's Health and Safety Advisors, shall review the company's health & safety performance and the effective implementation of the health & safety policy. The annual review shall cover:

- Accident and ill-health incidence monitoring results.
- Comparison with the objectives stated in the previous review.
- Effects and requirements of new legislation or changes.
- Irrespective of time periods, a review shall be conducted in the event of:
- Incidence of major accident or serious ill-health to employees or third parties affected by the company's undertaking.
- Incidence of HSE enforcement action.
- Major change to health and safety arrangements or company activities.

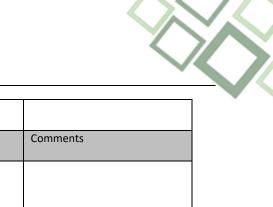




Forms

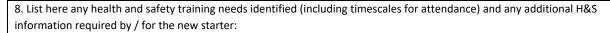
HEALTH AND SAFETY RECORD/CHECKLIST				
Name: Job Title:				
Start date:				
Initial induction should to be completed within two weeks of starting. Emery When induction health and safety training is completed, the relevant box(es should be recorded giving reasons and date for completion. The new started the form and keep a copy.	s) should	be ticked	For Items not covered, comments	
1. Health and Safety Policy & Information	Yes	No	Comments	
1.1 Has the <i>Company's Health and Safety Policy</i> been explained to the new starter and a copy provided?				
1.2 Have they been told where their nearest Health and Safety Notice Board is?				
1.3 Have they been instructed where to go to obtain health and safety assistance?				
2. Emergencies and Fire Arrangements	Yes	No	Comments	
2.1 Has the new starter been informed of the procedure to follow on discovering a fire or hearing the fire alarm, including where the fire escape routes and fire exits are in the building?				
2.2 Have you explained where the fire assembly point is and the role of the Fire Marshals?				
2.3 Have you explained where the fire extinguishers & fire blankets are positioned, how they operate and what type of fires they are suitable for extinguishing?				
3. Welfare Facilities & First Aid	Yes	No	Comments	
3.1 Have you pointed out the location of the toilets, washing facilities, kitchen & rest areas, lockers, emergency showers etc (as appropriate)?				
3.2 Have you pointed out the location of the nearest first aid box, first aid room (if provided) and told them who the local first-aiders are (and how to contact them)?				
4. Accidents and Hazard Reporting	Yes	No	Comments	
4.1 Have you explained the incident / accident reporting procedure and how to report a hazard?				
4.2 Have you pointed out the location of the nearest Emergency	1			





Telephone and the emergency numbers?			
5. Risk Assessments & Training	Yes	No	Comments
5.1 If the work of the new starter involves a significant amount of DSE use, has their DSE workstation been assessed by the DSE assessor?			
5.2 Have you discussed the following issues with the new starter, where these are appropriate to their work			
i. General workplace, workshop or laboratory health & safety (housekeeping, safe storage, local rules etc)?			
ii. Safe lifting techniques?			
iii. Work with hazardous substances, and the location of assessments and Safety Data Sheets, if applicable?iv. Safe use & maintenance of machinery and equipment, including pointing out the safety features?			
v. Electrical safety?			
vi. Risk assessments and safe systems of work specific to the work of the new starter (if not covered above)?			
5.3 Have the H&S training needs of the new starter been identified?			
6. Work Outside Hours and Prohibitions	Yes	No	Comments
6.1 Have you explained the policy on work outside normal working hours?			
6.2 Where appropriate, have you explained which work activities they are not permitted to undertake, equipment they are not authorized to use, substances they must not handle and any restricted locations?			
7. Personal Protective Equipment	Yes	No	Comments
7.1 Have you informed them of any activities for which personal protective equipment or other safety equipment is required and why it must be used?			
7.2 Has the necessary personal protective equipment (PPE) been issued and its proper use, storage and maintenance explained?			
7.3 Have you explained the procedure for reporting defective or damaged PPE and obtaining replacements?			





Declaration:

I certify that the above health and safety induction subjects have been explained:

Induction conducted by :Date

(please include job title)

Employee name / signature: Date

RISK ASSESSMENT FORM (JOB HAZARD ANALYSIS)

LOCATIONDEPARTMENT

WHO IS AFFECTED BY THE RISKS?

(e.g. employees, members of the public, tenants, contractors, trainees etc.).

HOW MANY ARE AFFECTED? (e.g. one person, 2-5, 6- 10, 11-50, 51-100) ASSESSMENT DATE

ACTIVITY / AREA OF ASSESSMENT	HAZARD (S)	EXISTING CONTROL MEASURES	RISK RATING SEVERITY x LIKELIHOOD		SEVERITY X TO REDUCE T		REVISED RISK RA [*] SEVERITY x LIKELIHOOD		Υx
			s	L	PR		S	L	PR

ASSESSED BY (please print)SIGNED

LINE MANAGER (please print)DATEDATE





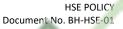
RISK ASSESSMENT

The purpose of carrying out risk assessments is to identify those activities where action needs to be taken to improve existing control measures (or introduce new ones) in order to eliminate and control the risk of accidents at work which may result in personal injury or ill health.

1RE AND WHEN

DSE Workstation Assessment Checklist

Workstation location and I.D. number (if	
applicable)	
User:	
Checklist completed by:	
A	
Assessment checked by:	
Date of assessment:	
Any further action needed? Please	
summarize details	
Follow-up action completed on:	







This checklist can be used as an aid to completing Display Screen Equipment (DSE) risk assessments and to help comply with the Health and Safety (Display Screen Equipment) Regulations.

The checklist should be given to individual DSE Users to complete, then completed forms should be reviewed by the DSE Assessor to identify any problems that require further attention.

Please work through the checklist, ticking either the 'yes' or 'no' column against each risk factor

- 'Yes' answers require no further action
- 'No' answers will require investigation and/or remedial action by the DSE assessor. They should record their decisions in the 'Action to take column'. Assessors should check later that the actions taken have resolved the problem.

The diagram in the Appendix provides a guide to setting up DSE workstations correctly. This can be given to DSE users and posted on the companies health and safety notice board.



Risk Factors	Yes	No	Things to consider	Action to take
1.Display screens			Make sure screen is clean.	
Are the characters clear and readable?			Check that text and background colors	
			work well together.	
Is the text size comfortable to read?			Software settings may need adjusting	
			to change text size.	
Is the image stable, free from flicker and jitter?			Try using different screen colors to	
			reduce flicker e.g. darker background	
			and lighter text. If problems still exist	
			consult IT.	
Is the screen's specification suitable for its			Intensive graphic work or work	
intended use?			requiring fine attention to small details	
			may require large screens.	
Is the brightness and/or contrast adjustable?			Separate adjustment controls are not	
			essential provided the user can read	
			the screen easily.	
Does the screen swivel and tilt?			Swivel and tilt need not be built in; you can add a swivel and tilt mechanism.	
Is the core from from glars and reflections?				
Is the screen free from glare and reflections?			Use a mirror placed in front of the screen to check where reflections are	
			coming from	
			You might need to move the	
			screen/desk and/or shield the screen	
			from source of reflections.	
Are adjustable window coverings provided and in			Check that the blinds work. Blinds with	
adequate condition?			vertical slats can be more suitable than	
			horizontal ones. Only consider anti-	
			glare filters as a last resort.	
2. Keyboards				
Is the keyboard separate from the screen?			This is a requirement, unless the task	
			makes it impracticable (e.g. where	
			there is a need to use a portable).	
Does the keyboard tilt?			Tilt need not be built in.	
Is it possible to find a comfortable keying position?			Try pushing the display screen further	
			back to create more room for the	
			keyboard, hands and wrists.	
Does the user have good keyboard technique?			User may require further training to	
			prevent:	
			 hands bent up at wrist; 	
			 hitting the keys too hard; 	
			•overstretching the fingers.	
Are the characters on the keys easily readable?			Keyboards should be kept clean. If	
			characters still cannot be read, the	
			keyboard may need modifying or	
			replacing. Use a keyboard with a matt finish to	
	1	1	reduce glare and/or reflection.	



Risk Factors	Yes	No	Things to consider	Action to take
3. Mouse, trackball etc				
Is the device suitable for tasks it is used for?			If the user is having problems, try a different device. There are a variety of shapes and sizes available. Alternative devices like touch screens may be better for some tasks.	
Is the device positioned close enough to the user?			Most devices are best placed as close as possible e.g. right beside the keyboard. Training/reminders may be needed to: •prevent arm overreaching; •not to leave hand on the device when it is not being used; •encourage a relaxed arm and straight wrist.	
Is there support for the device user's wrist and forearm?			Support can be gained from, for example, the desk surface or arm of a chair. If not, a separate supporting device may help. The user should be able to find a comfortable working position with the device.	
Does the device work smoothly at a speed that suits the user?			Cleaning may be required e.g. mouse ball and rollers Check the work surface is suitable. A mouse mat may be needed.	
Can the user easily adjust software settings for speed and accuracy of pointer?			Users may need training in how to adjust device settings.	
4. Environment				
Is there enough room to change position and vary movement?			Space is needed to move, stretch and fidget. Consider re-organizing the office layout and check for obstructions. Cables should be tidy and not a trip or snag hazard.	
Is the lighting suitable, eg, not too bright or too dim to work comfortably?			Users should be able to control the light levels, e.g. by adjusting window blinds or light switches. Consider shading or repositioning light sources or providing local lighting, e.g. desk lamps (ensure lights do not cause glare by reflecting off walls or other surfaces.	
Does the air feel comfortable?			DSE and other equipment can dry the air. Circulate fresh air if possible. Plants may help. Consider a humidifier if discomfort is severe.	

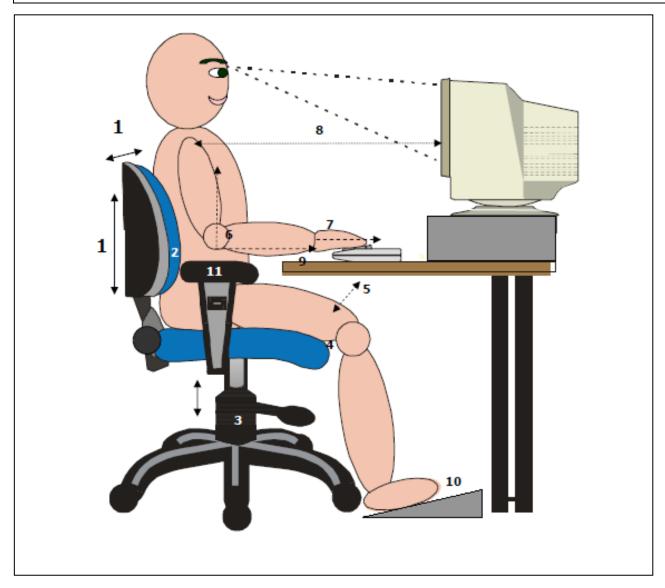


e levels of heat comfortable?				Action to take
			Can heating be better controlled? More ventilation or air-conditioning may be required if there is a lot of electronic equipment in the room. Or can users be moved away from the heat source?	
e the levels of noise comfortable?			Consider moving sources of noise e.g. printers away from user. If not, consider soundproofing.	
Risk Factors	Yes	No	Things to consider	Action to take
General				lave
s the checklist covered all the problems you ay have working with DSE?				
n you confirm that you do not experience				
comfort or other symptoms which you attribute working with DSE?	2			
ve you been advised of your entitlement to eye development de				
you take regular breaks working away from E?				



Ideal seated position for DSE work

- 1. The seat back rest should be adjusted so you are sitting upright
- 2. Good lumbar support should be achieved (i.e. the lower back should be supported)
- 3. Seat height should be adjusted to achieve 4 7 below
- 4. There should be no excess pressure on the underside of your thighs and back of knees.
- 5. There should be room under the desk to allow changes in posture (no obstacles)
- 6. Forearms should be horizontal and elbows approximately at right angles
- 7. There should be minimal bending of the wrists and hands, they should be horizontal
- 8. Screen should be at arm's length and height and angle should be adjusted to allow a comfortable head position with the neck and head straight
- 9. Ensure there is space in front of the keyboard to support your hands/wrists during pauses in keying. Place mouse close to keyboard
- 10. A foot support should be provided if your feet do not now touch the ground
- 11. If seat arm-rests are provided these should not prevent you from pushing your chair under the desk or should be adjustable in height







PERSONAL PROTECTIVE EQUIPMENT (PPE) ISSUE RECORD

EMPLOYEE NAME	
WORK LOCATION	
PREMISES/DIVISION/UNIT	

The personal protective equipment (PPE) listed below is issued to you in accordance with KAH's HSE policy.

It is your responsibility to:

- 1. Wear and use each item of PPE in accordance with the manufacturer's instructions and any training given.
- 2. To clean and store the PPE correctly.
- 3. To report any defects when discovered and to obtain replacements.

Type of PPE	Date Issued	Signature

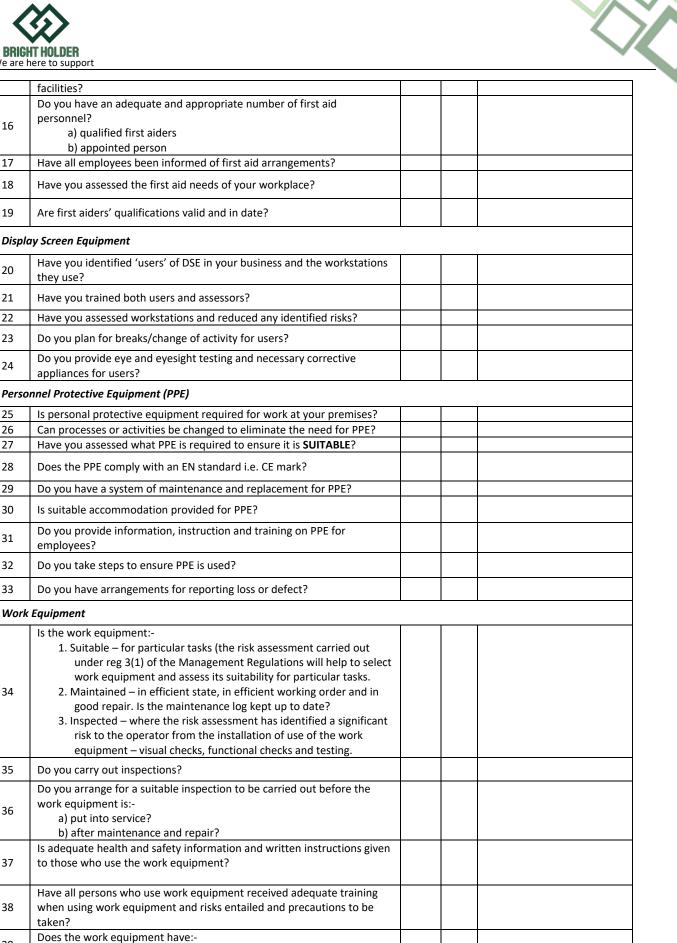




HEALTH AND SAFETY SELF AUDIT CHECKLIST

No	Question	Yes	No	Reference/Note
Gene	ral			1
1	Has your business registered with the local authority?			
2	Are you displaying a Health and Safety Poster with the appropriate information ?			
3	Do you employ your staff under rules and regulations?			
Safet	y Policy			1
4	Do you employ 5 or more people?			
5	Have you prepared a written statement of your health and safety policy?			
	Does your policy :			
	(a) State your general policy on health and safety?			
	(b) Describe the organization for carrying out your policy?			
	(c) Describe the arrangements for carrying out your policy?			
6	Do your staff know about the policy and understand it?			
7	Is the policy reviewed regularly and if circumstances changed			
Accid	ents	I		
8	Do you have an accident book?			
9	Are all incidents recorded?			
10	Are you aware of your duties under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995? (RIDDOR)			
11	Do you make all staff aware of the need to report work-related injuries, dangerous occurrences or cases of disease?			
12	Do you know who to report injuries, dangerous occurrences and cases of disease to?			
13	Do you have a supply of forms (F2508) for reporting accidents?			
14	Are you aware of the types of accidents/injuries, dangerous occurrences and cases of diseases which are reportable?			
First A	Aid	1	1	J
45		1	1	
15	Have you provided adequate and appropriate first aid equipment and		1	





a) stop controls?



<				
יאפו				
e are	here to support			
	b) emergency stop controls?			`
	c) controls which are clearly marked?			
	d) A means to isolate it from all sources of energy?			
40	Is the work equipment stable			
-				
41	Is the lighting suitable and sufficient?			
42	Are maintenance operations carried out when the equipment is shut down?			
43	Are any warning signs unambiguous and easily understood?			
HEA	LTH			
	Ventilation – should be adequate, in many cases windows and door will			
44	be sufficient. If mechanical ventilation is used it should be properly maintained.			
45	Temperature – should be reasonable (normally 16°C). Where this is not			
45	reasonable local heating or cooling may be used.			
46	Lighting – should be suitable and sufficient for people to work and move			
	about safely. Cleanliness and waste materials – kept sufficiently clean. Suitable waste	 		
47	storage and removal.			
48	Room dimensions and space – each person should be provided with at			
-	least 11m 3 . Workstations and seating – be ergonomically suitable and liked to the			
49	task/worker. Seats should give adequate support for the lower back and			
49	footrests provided where necessary			
SAFE	TY			
- 0	Maintenance – of the workplace, equipment, devices and systems in			
50	efficient working order.			
	Floors and traffic routes – these include routes for pedestrians and			
51	vehicles. Surfaces should not have holes, be uneven or slippery and kept free of obstructions.			
	Glazing – transparent/translucent surfaces in doors, gates and walls to			
52	be either safety material or protected against breakage where necessary			
	for reasons of health and safety			
	Windows and window cleaning – should be capable of being opened			
53	safely. Should be provision for safe cleaning if this cannot be carried out at ground level.			
	at ground level. Doors and gates – should be suitably constructed and fitted with safety	<u> </u>		
	devices if necessary?			
54	Escalators – function safely. Have any unnecessary safety devices and			
	readily accessible emergency stop controls.			
WFI	FARE		1	
** L L				
	Sanitary conveniences and washing facilities – at readily accessible			
55	places, to be kept clean, adequately ventilated and lit. Washing facilities			
	must have hot and cold water, soap and a means of hand drying. The			
	number of facilities to be provided is laid out in the Code of Practice.	<u> </u>		
56	Drinking Water – adequate, wholesome, readily accessible, conspicuously marked where necessary. Also sufficient drinking vessels.			
57	Accommodation for clothing – adequate, suitable and secure			
	Changing facilities – for special work clothing and readily accessible from			
58	workrooms.			
	Facilities for rest and eating meals – suitable, sufficient and readily			
59	accessible. Suitable facilities to eat meals where meals are regularly			
	eaten in the workplace. Rest area should protect non-smokers from			
	discomfort caused by tobacco smoke.	. 1	1	





60	Has the electrical installation of the building been checked in the last 5 years?			
61	Do you have a certificate issued by a competent person to show the installation is safe?			
62	Do you have a register of portable electrical equipment?			
63	Do you carry out maintenance of portable electrical equipment? a) visual checks? b) combined inspection and test?			
Noise				
64	Do you think you may have a noise problem? (If you have to raise your voice when standing next to someone this level is about 85dB(A) therefore possible problem.			
65	Have you had the noise exposure assessed by a competent person?			
66	Has the noise level been reduced as far as reasonably practicable?			
67	 If your noise exposure is above the action level:- a) Have all employees been informed of the risks? b) Have you provided, maintained and ensured use of ear protectors? c) Marked ear protection zones (as necessary)? d) Ensured ear protection is freely available? 			
68	Have you considered those people with particular needs:- a) Disabled staff b) Visitors c) lone workers d) inexperienced staff			
69	Is the fire risk adequately controlled:- a) information and instruction? b) Adequate emergency procedures?			
70	Are the following checked:- a) Means of escape b) fire detection and raising the alarm c) first aid firefighting equipment d) fire drills practiced e) fire training for all staff			
71	Is there any further action necessary to control the risk of fire?			
CON	/ /MENTS	11		