

HEALTH & SAFETY POLICY

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Venti Limited is committed to safeguarding the health, safety and welfare of its employees as well as the people and property affected by its operations. To reduce risk of accident or injury the company seeks to provide a work environment that, as far as is reasonably practicable, is safe and preserves the health and welfare of those that work within it and those that are affected by its activities.

The company is committed to continuously improve its standard of health and safety throughout its operations. To this end the board provides leadership in health and safety matters by engaging and training the workforce in the achievement of safe and healthy working conditions and promoting best practice as far as is practicable. The board is committed to providing adequate resources to train, monitor and assess the company's health and safety performance and deliver the objectives set for continuous improvement.

The requirements of this policy are communicated to all employees through the company's heads of department and the management of health and safety is promoted through consultation and involvement. The health and safety policy is displayed at all company sites and offices and issued to all new staff joining the company at induction. This policy should be read in conjunction with the Venti Limited specific documents detailed within the General Arrangements document.

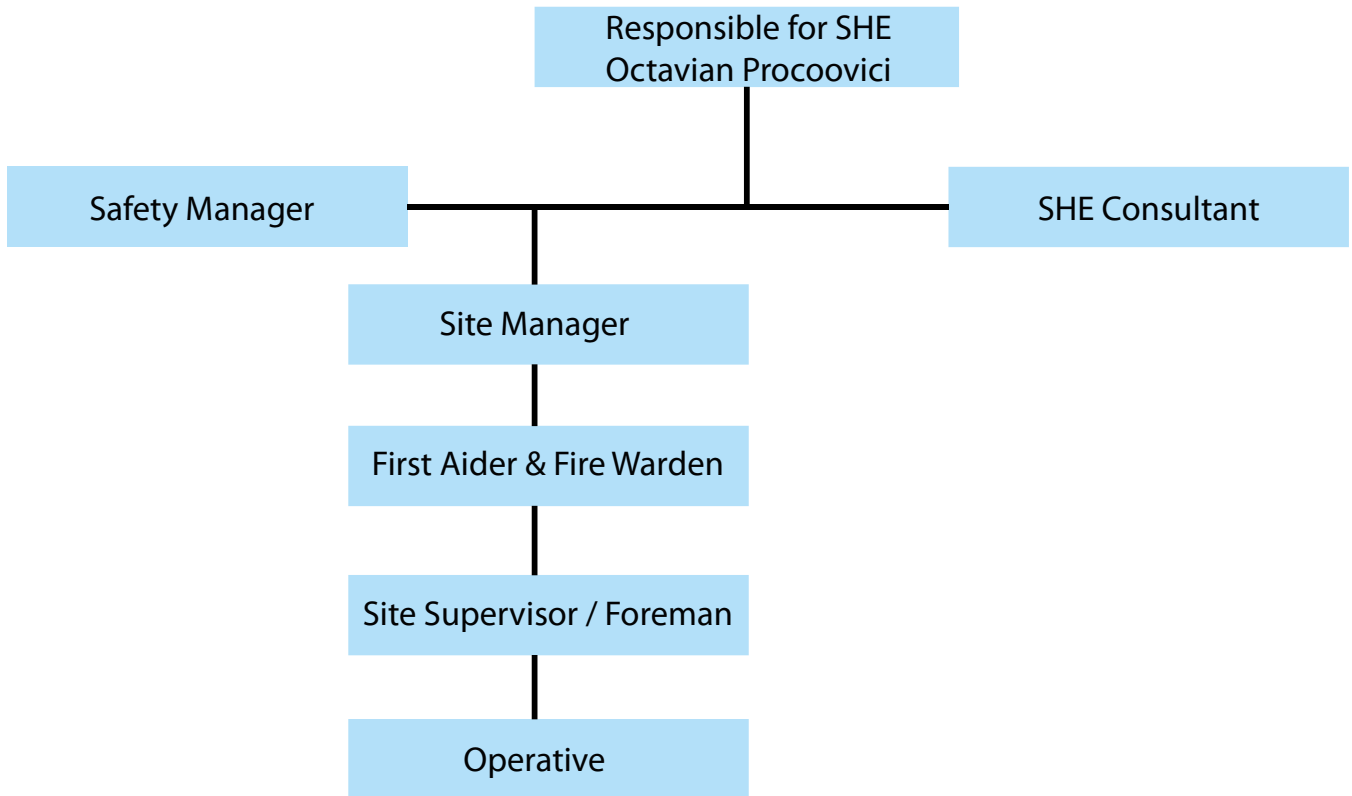
It is the duty of managers to prevent injury and ill health as far as is practicable and it is the duty of each employee to exercise personal responsibility for their own health, safety and welfare as well as that of other people. Compliance with legal requirements should be adhered to at all times and no breaches should be tolerated.

This policy will be reviewed periodically and amended as necessary to ensure that it remains relevant to the activities of the company and complies with current legislation and best practice.

ORGANISATIONAL RESPONSIBILITIES

Responsibility for health and safety starts with the board of directors, as represented by the managing director, who nominates a director in charge of health, safety and environmental matters (SHE).

The chain of responsibility is as follows:



The Board of Directors

The board is ultimately responsible for standards of health and safety and shall:

- ensure that an effective health and safety policy is in place.
- have overall collective responsibility for health and safety matters.
- support and assist the managing director in his role of providing strategic direction for the effective management of the company's health and safety policy.
- support the SHE committee in the initiatives it seeks to implement and its drive for continuous improvement.
- ensure that it receives adequate training to maintain its knowledge and understanding of current health and safety duties.
- identify and understand the risks created by Venti Limited's growth and development as a business in so far as how these might adversely affect the health and safety of company employees and others outside the organisation.
- ensure that an appropriate approach to occupational health is taken which includes appropriate health surveillance, sickness absence management and return to work arrangements.

- communicate good health and safety practice throughout the company.
- ensure that suitable resources and strategic direction is provided to discharge the company's health and safety responsibilities.
- set Venti Limited health and safety objectives and review performance against them.
- ensure that all liability is covered by insurance and review insurance claims periodically.
- nominate a director to be responsible for health and safety throughout the company.

Director in Charge of SHE

The director nominated by the board to be responsible for SHE shall:

- communicate this policy and promote health and safety awareness and safe practices to all employees.
- assign responsibilities as outlined in this policy.
- identify the company's training needs and maintain an ongoing training programme to meet those needs.
- monitor and assess health and safety performance in the pursuance of continuous improvement.
- ensure the development of adequate health and safety documentation.
- maintain records of accidents and safety performance.
- advise employees of safe and healthy working practices.
- ensure legal compliance and the implementation of health, safety and environmental management plans, SWMPs, risk assessments, method statements, fire plans and similar across all company operations.
- review safety reports to ensure that, in the case of persistent breaches of safety rules, appropriate action is taken to avoid a reoccurrence as far as reasonably practicable.
- advise the company on new legislation, approved codes of practice and similar guidance.

SHEQ Committee

The SHEQ Committee is chaired by the managing director and comprises as a minimum the director in charge of SHE, the temporary works health and safety manager, the quality manager and employee representatives on a rotational basis.

The SHEQ Committee shall:

- review SHEQ processes and performance throughout the organisation and implement actions, where appropriate, to correct and improve process and performance.
- facilitate independent SHEQ audits.
- issue advice to the company on urgent SHEQ issues requiring immediate action.
- liaise, where required, with the HSE, EA and other external bodies on SHEQ issues.
- review serious incidents and near misses to seek preventive action and ensure all learning points are communicated across the company.
- review SHEQ risk assessments, fire strategy and occupational health matters in respect of office staff.
- review SHEQ strategy in relation to Venti Limited's supply chain.
- maintain accreditation in ISO 9001, ISO 14001, OHSAS 18001 and CHAS(when obtained).

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Temporary Works Health and Safety Manager

The temporary works health and safety manager shall:

- promote health and safety awareness and safe practices to all employees.
- promote and monitor compliance with safety regulations, other relevant statutory provisions, instructions and arrangements in respect of the Venti Limited Health and Safety Operating Procedures.
- promote the understanding and application of all responsibilities with regard to the company's temporary works and health and safety standards.
- implement current temporary works procedures and assess and control all risks associated with temporary works.
- assess and ensure the competence of design and site-based staff responsible for temporary works.
- ensure that those responsible for on-site supervision receive full details of the design, including any limitations and guidance notes.
- monitor amendments/ changes to temporary works procedures and provide expert advice on typical hold points and all relevant inspections and permits which will be needed.
- ensure temporary works requirements are identified sufficiently in advance of work and deal with temporary works modifications and coordinate temporary works design checks.
- ensure responsibility for design and independent checking of design is allocated and accepted and that a satisfactory brief is established for each separate design to enable all temporary works to be co-ordinated.
- ensure appropriate procedures are applied to control and manage changed requirements for temporary works inclusive of re-design and independent checking prior to use.
- ensure that information in respect of hazards to health and safety that cannot be eliminated at design stage is provided by the responsible designers, and that this information is made known to those persons affected.
- monitor and check that temporary works are safely erected in accordance with the approved designs, using only the specified materials, equipment components, sequences and method statements.
- monitor and check that appropriate inspections are carried out prior to the use of temporary works and that necessary corrections are identified, recorded and implemented where required and prior to use of the temporary works.
- monitor and check that temporary works are used, loaded, unloaded, dismantled/struck strictly in accordance with the designs, and issue and control appropriate permits to load/unload, dismantle/strike temporary works/falseworks accordingly.
- monitor each project's temporary works progress.
- conduct site temporary works and health and safety inspections and ensure that safe methods of work, approved plans and specifications are being adhered to.
- initiate/ organise temporary works and health and safety training for staff as required and set an example through high personal standards in their application.
- ensure that their project teams, sub-contractors, visitors, etc. have access to adequate welfare facilities.
- ensure that their project teams have an adequate level of competence, supervision, instruction and information to complete their work safely.

- ensure that their sites display all necessary safety and policy documentation in accordance with the company notice boards.
- report and investigate SHE incidents as necessary.
- ensure the proper selection and adequate management of suppliers and sub-contractors.

Site Managers and Assistant Site Managers

Managers who are responsible for the day to day running of Venti Limited sites shall:

- adhere to the company's health and safety policy and the company's SHE management system and associated documentation, including the construction phase health, safety and quality plans.
- maintain and use the General Arrangements file as a reference in managing health and safety effectively.
- ensure that all operatives use the appropriate PPE for every operation as appropriate.
- maintain a safe means of access and egress to and from places of work.
- ensure work related hazards are identified and that suitable and sufficient risk assessments are in place to eliminate risk of accident and/ or injury or, where that is not reasonably practicable, reduce those risks.
- ensure method statements are in line with legislative requirements and company policy and associated risk assessments.
- review safety reports and ensure that corrective action is taken and recorded appropriately.
- provide comprehensive instruction to all employees, visitors and sub-contractors on their responsibilities in relation to method statements and site rules and ensure that they take all reasonable and practicable steps to prevent unsafe working conditions and accidents from occurring.
- ensure that plant and machinery is inspected periodically and properly maintained in compliance with legal requirements.
- maintain good records including a site diary, site inductions and attendance lists, accidents and near misses, complaints and inspection logs.
- maintain good housekeeping at all times.
- ensure that defects are reported and, as far as practicable, promptly rectified.
- maintain first aid facilities, check the accuracy and completeness of statutory notices and registers and ensure that all necessary safety and policy documentation is displayed on site notice boards.
- ensure that the provisions of all relevant legislation are adhered to.
- ensure as far as practicable that proper welfare facilities are provided.
- report and investigate SHE incidents as necessary.
- promote and communicate safe working practices by effective consultation with employees, subcontractors and site operatives, e.g. tool box talks, induction, pre-order meetings, etc.

Supervisors / Foremans

Supervisors / Foremans shall:

- control and supervise all temporary works activities on site.
- ensure compliance with safety regulations, other relevant statutory provisions, instructions and arrangements in respect of the Venti Limited Health and Safety Operating Procedures.

- ensure that independent design checks are carried out and that the temporary works design is satisfactory and made available to the relevant parties.
- register or record all drawings, calculations and other relevant documents relating to the final design.
- ensure that risk assessments and guidance notes are prepared covering the safe erection and dismantling sequence.
- ensure that temporary works are safely erected and dismantled in accordance with the approved designs, using only the specified materials, equipment components, sequences and method statements.
- ensure that appropriate inspections are carried out prior to the use of temporary works and that necessary corrections are identified, recorded and implemented where required and prior to use of the temporary works.
- ensure that appropriate maintenance is carried out to temporary works.
- ensure that temporary works are used, loaded, unloaded, dismantled/ struck strictly in accordance with the designs, and issue and control appropriate permits to load/ unload, dismantle/ strike temporary works/ falseworks accordingly.

Company Employees Generally - Including Temporary Workers

Employees other than those that fall within the definitions above shall

- work with reasonable care to ensure the health and safety of themselves, others and their working environment.
- ensure they understand the instructions provided and work in strict accordance with those instructions and the relevant training they have undergone.
- take care of their health through correctly using equipment, materials and controls, cooperating with measures used to minimise ill-health including the early reporting of concerns, wearing of PPE as identified by risk assessments, etc.
- co-operate with those allocated with SHE responsibilities.
- report problems, hazards or potential hazards in relation to SHE to their manager.

HEALTH AND SAFETY DOCUMENTATION

Health and safety documentation is divided into a 3 tier hierarchy comprising the following.

Level 1	Health & Safety Policy Company Policy Statements
Level 2	Managing Health & Safety Guidance for Supervisors / Foremens Culture & Policies Emergency Response Plan Environmental & Sustainability Policy
Level 3	Venti Limited Forms Local Documentation

The Managing Health and Safety document outlines the roles and responsibilities relating to project staff whilst the Guidance to Supervisors describes the expectations associated with the role of supervisor on site. Both documents are issued to all project and site managers.

Venti Limited forms are standard documents that should be used in the everyday management of a project including matters relating to health and safety.

Local documentation and procedures are health and safety matters that are unique to a project and/ or site and include risk assessments, method statements, registers, records of inductions, toolbox talks, etc.

MONITORING AND CONTROL

Venti Limited is committed to ensuring that an appropriate degree of control is exerted over all workplaces through the provision of competent line management who understand their responsibilities, the company's health and safety procedures, risk assessments and method statements.

Monitoring and control will also be exerted through regular health and safety audits undertaken by external sources who report company health and safety performance to senior management. Supervision levels are determined according to the level of risk involved in their activities and the competence of those undertaking the task and should be agreed prior to the commencement of operations and be subject to continuous review.

CO-OPERATION AND COMMUNICATION

Venti Limited considers co-operation and communication between individuals, safety representatives, managers, employees and all interested parties essential to combating risks to health and safety. Therefore, the company will promote co-operation in order to generate the added benefits that arise from the involvement of all and the pooling of knowledge and experience. Venti Limited communicates through various mechanisms to improve health and safety risk management.

Venti Limited's consultation methods and forums for communication include but are not limited to:

- Quarterly health and safety reviews at board meetings
- Monthly health and safety reviews at management meetings
- Toolbox talks on site with site staff and site operatives
- Promotion of an "open door" policy for all employees
- Formal health and safety training committees with Venti Limited's training partners
- Formal health and safety meetings with Venti Limited's external SHE auditors
- Subcontractor involvement during preparation of risk assessments and method statements for work activities

Venti Limited requires all staff to "lead by example" and to emphasise the importance of health and safety through their visible behaviour.

RISK CONTROL AND SAFE METHODS OF WORK

The assessment of risk is a process that identifies hazards and details the control measures to be adopted. The risk assessment process should start at the earliest possible stage of a project or task and continue during the works, focusing on successively smaller elements of work and work interfaces.

METHOD STATEMENT

Method statements will generally be produced in conjunction with subcontractor involvement and, where practicable, from standard procedures. The precise content of a method statement will vary according to the scale and complexity of the task and the level of risk involved. However, a standard company method statement format may be used to ensure all relevant information which should be included is covered.

TRAINING

A structured health and safety training programme is to be administered by the construction director covering all of the company's employees.

Venti Limited is committed to ensuring that employees possess the appropriate level of competence dependent on their role in the organisation. This will be achieved through a combination of appropriate recruitment, training, selection and development of individuals, backed by advisory support.

Managers at all levels are responsible for assessing and meeting the training needs of their staff. The personnel department will advise and assist managers in carrying out these tasks and in compiling formal training, as well as ensure health and safety training records for all employees are maintained.

SECURITY AND PUBLIC SAFETY

Sites should be made reasonably secure against trespass by children and others particularly outside normal working hours. At the end of each working period ladders should be removed or made incapable of use, plant immobilised and bricks and materials safely stacked. See HSE guidance note HS(G)151 - aimed at everyone in the construction industry along with people who have no direct involvement with the industry.

ACCIDENT REPORTING AND DANGEROUS OCCURRENCES

In the event of an accident and/ or incident occurring the following guide applies.

Type of Incident	Action to be Taken
Accident resulting in death	<ol style="list-style-type: none"> 1. Notify the HSE as soon as possible by telephone. 2. Notify the construction director or managing director by telephone. 3. Upon full investigation, a director nominated by the board will complete form F2508 and forward it to the appropriate HSE area office within ten days of the accident. 4. Undertake accident and incident report.
Accident resulting in major injury or admission into hospital for more than 24 hours	As above
Accident resulting in a person being incapacitated for work for over seven days (excluding the day of the accident but including any non working day)	<ol style="list-style-type: none"> 1. Notify the construction director by telephone. 2. The contract manager or construction director will complete form F2508 and forward it to the appropriate HSE area office within ten days of the accident. 3. Undertake accident and incident report.
Accident less than 3 days	Accident book.
Near misses and dangerous occurrences (for definition of a dangerous occurrence contact the construction director).	Undertake accident and incident report.

N.B. Details of the above accidents must be entered in the accident Book as must all accidents resulting in injury, however trivial.

Safety Bulletin no. 2, the Reporting of injuries, Diseases and Dangerous occurrences Regulations 2013 (RIDDOR) and leaflet INDG453 (rev 1) 'a Brief guide to the reporting of injuries, Diseases and Dangerous occurrences Regulations' (RIDDOR published 01/10/13).

The incident contact centre (ICC) may be used as an alternative means of reporting notifiable accidents and dangerous occurrences:

Internet Reports www.hse.gov.uk/riddor
 Telephone Reports 0845 300 9923

Accident statistics will be collated and recorded on a monthly basis by the director in charge of SHE and reported to senior management.