



LUCAS GROUP
HEALTH & SAFETY POLICY



Lucas Group

Health & Safety Policy



LUCAS GROUP HEALTH & SAFETY POLICY



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HEALTH SAFETY POLICY STATEMENT

It is this company's intention that its work will be carried out in accordance with the relevant statutory provisions and all reasonably practicable measures taken to avoid risk to its employees or others who may be affected.

This document has been prepared to define the way that this company intends to manage health and safety and to meet the requirements of legislation and in particular:

- The Health and Safety at Work Act (1974),
- The Management of Health and Safety at Work Regulations (1999) amended 2006, and
- The Construction (Design and Management) "C.D.M." Regulations (2007)

and the Approved Codes of Practice (ACOP).

Management and supervisory staff have the responsibility for implementing this policy throughout the company and must ensure that health and safety considerations are always given priority in the planning and supervision of work.

All employees and sub contractors are expected to co-operate with the company in carrying out this policy and must ensure that their own work, so far as is reasonably practicable is carried out without risk to themselves or others.

The company has appointed Mr. Danny Lucas as having particular responsibility for health, safety and welfare and to whom reference should be made in the event of any difficulty arising in the implementation of this policy.

This statement, and the full health and safety policy will be made available to any client, employee or sub contractor of the company, and is available from the Company's Internet web site.

Danny Lucas:
Managing Director
Date: 8/8/2009



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STATEMENT OF INTENT

OBJECTIVE

To prevent, insofar as it is reasonably practicable during the course of the work of duties being undertaken, any accidental occurrence which may directly or indirectly result in:

- (a) Injury to any person.
- (b) Damage to, or loss of any plant, equipment, property, materials or products;
- (c) Delays in any processes or operation;
- (d) Events which may otherwise be detrimental to efficiency and/or prestige.

SCOPE

The Policy is applicable to all Lucas Group employees.

This Policy will also apply to all persons having responsibilities that relate to and necessitate their presence and the execution of their duties within the areas of Lucas Group works & premises. These persons include the following:

Employees of: Sub-Contractors,
Consulting Practices,
Clients and
Self Employed persons.

RESPONSIBILITY

The application and promotion of the policy is the responsibility of senior management of this Company. Whilst duties and tasks may be delegated, the overall responsibility remains that of senior management. The company has appointed Mr. Danny Lucas as having particular responsibility for health, safety and welfare and to whom reference should be made in the event of any difficulty arising in the implementation of this policy. The Company employs a safety, quality and environment (SQE) manager who acts as the health and safety adviser as required by the The Management of Health and Safety at Work Regulations (1999).

PERSONNEL OBLIGATIONS

All Company employees, regardless of their status, are expected to abide by the principles of this Policy as and where applicable. We also need the co-operation of all those mentioned within the Scope Section of this Policy to work in such a way that accidents to themselves and others will be prevented.

APPLICATION AND IMPLEMENTATION

The following principles shall be applied to all operations undertaken by the Lucas Group, and shall be the basis of any specific instructions, methods or systems which may be necessary in order to achieve the policy objective. To ensure that this policy can be successfully implemented, Lucas Group will provide such reasonable funds or resources as may be necessary.



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SAFETY ORGANISATION – RESPONSIBILITIES AND DUTIES

DIRECTOR RESPONSIBLE FOR SAFETY:

The director responsible for safety is Mr. Danny Lucas.

He is responsible:

- for the overall effectiveness of the Lucas Group's health and safety policy and the periodic review and amendment of the policy as may be necessary in the light of any developments. He will ensure that regular reports are made to the Board of Directors of the Lucas Group's safety performance, accident record and of significant events affecting or arising out of their operations.
- to ensure that adequate time, resources and funds are made available from the board of Directors for safety measures.
- for the assessment of injury, loss or damage, risk and liabilities relating to the Company's operations, and adequacy of insurance cover.
- to ensure that Lucas Group personnel are adequately competent to carry out the work required of them.
- to ensure that all the company premises, offices, material storage areas, the yard, workshops, access ways, machines, equipment, vehicles etc., are maintained in a safe order.
- to ensure that fire precautions and emergency evacuation procedures for the company premises are in order.
- to ensure that arrangements for meeting health and safety legislation and are implemented and maintained.
- to ensure first aid and welfare arrangements are in order.

CONTRACTS MANAGER

Our Contracts Managers are responsible with regard to:

Policy, regulations and risks

- to be familiar with and to observe this policy, statutory regulations and codes of practice.
- to ensure that personnel under their control carry out this health and safety policy at all times.
- to organise work so that it is carried out in line with this policy, to the required standard, and ensuring minimum risk to the work force, equipment and materials.
- to carry out risk assessments and devise safe systems of work (i.e. method statements).
- to ensure the general public or employees of other companies are not put at any risk from the company's operations and that security arrangements are kept in order at all times.



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Accidents and incidents

- to ensure that all accidents, or dangerous occurrences are investigated, and that suitable remedial measures are taken to prevent recurrence.
- to ensure details of any accidents that occur are entered in the Lucas Group accident records, regardless of whether or not such accidents involve sub-contractors, employees, visitors, or members of the general public, and to complete any further documents as may be required by the regulations and forward such documents to the relevant authority in accordance with The Reporting of Injuries Diseases and Dangerous Occurrence Regulations 1995 (R.I.D.D.O.R.).

Management and control

- to instruct and assist site managers in their duties.
- to reprimand and discipline any employees and subcontractors who are careless in regard to their own or others safety, and to commend those who, by their action or initiative, eliminate hazards and reduce risks.
- to ensure subcontractors' safety arrangements are vetted to ensure they will be working in accordance with our health and safety requirements.
- to ensure that management and operatives are made aware of any safety requirements of the client or principal contractor.

SITE MANAGER

Our Site Managers are responsible with regard to:

Policy, regulations and risks

- to be familiar with and to observe this policy, statutory regulations and codes of practice.
- to ensure that personnel under their control carry out this health and safety policy at all times.
- to organise work so that it is carried out in line with this policy, to the required standard, and ensuring minimum risk to the work force, equipment and materials.
- to carry out risk assessments and devise safe systems of work (i.e. method statements).
- to ensure that fire precautions and emergency evacuation procedures for their work areas are satisfactory and maintained in order.
- to ensure first aid and welfare arrangements are maintained in order on site.
- to ensure the general public or employees of other companies are not put at any risk from the company's operations and that security arrangements are kept in order at all times.

Accidents and incidents

- to ensure that all accidents, or dangerous occurrences are investigated, and that suitable remedial measures are taken to prevent recurrence.



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- to ensure details of any accidents that occur are entered in the Lucas Group accident records, regardless of whether or not such accidents involve sub-contractors, employees, visitors, or members of the general public, and to complete any further documents as may be required by the regulations and forward such documents to the relevant authority in accordance with The Reporting of Injuries Diseases and Dangerous Occurrence Regulations 1995 (R.I.D.D.O.R.).

Management and control

- to check proof of competence, and monitor performance, of persons under their control.
- to ensure all staff, employees, and sub-contractors receive the Lucas Group safety induction and safety awareness training before any work on site, and to maintain records of this training using Lucas Group's documentation.
- to instruct operatives in precise terms as to work methods and by supervision to ensure compliance with method statements and risk assessments.
- to reprimand and discipline any employees and subcontractors who are careless in regard to their own or others safety, and to commend those who, by their action or initiative, eliminate hazards and reduce risks.
- to ensure that subcontractors' safety arrangements are vetted to ensure they will be working in accordance with our health and safety requirements.
- to ensure that all visitors including suppliers, delivery drivers, representatives, etc., comply with safety requirements.
- to ensure that persons under their supervision use protective clothing and equipment as specified and when required.
- to ensure registers and other documentation provided by the Company are completed in a proper manner and are kept in an easily accessible place for other personnel concerned.
- to ensure that management and operatives are made aware of any safety requirements of the client or principal contractor.
- to set a good example.

Plant and equipment

- to ensure that all plant and equipment supplied to site is safe, fully efficient, conforms to regulations and is tested and inspected in accordance with all the current regulations and the requirements of this policy.
- to make certain that plant and equipment is operated, controlled and managed only by competent persons.
- to ensure that defective plant and equipment is put out of service and that precautions are taken to ensure that it cannot be used until it can be properly repaired, or disposed of.



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- to check that periodic tests, inspections and maintenance required are carried out for plant and equipment in service, and that records are maintained in line with legislation and this policy.

COMMERCIAL & PURCHASING MANAGERS

Commercial managers and directors, contracts managers, logistics manager, and others who may authorise procurement of goods or services, are responsible:

- to be familiar with and to observe this policy, statutory regulations and codes of practice.
- to ensure the competence of subcontractors and their employees by means of the controls detailed in the arrangements section of this policy:
- to ensure that all suppliers provide full information on any hazards associated with their products and any precautions required and to ensure that this information is passed to our supervisors.
- to ensure that records are kept in order and up-to-date.
- to ensure that a suitable PPE as specified is available and provided to site as and when required.
- to ensure that material and equipment delivered to the Company premises or work areas is stored in a manner which does not create a hazard or risk, and where it shall not be damaged.

EMPLOYEES AND SELF EMPLOYED OPERATIVES

As an employee or self employed person working for the Lucas Group, you must:

- read and understand this Lucas Group health and safety policy and carry out work in accordance with its requirements.
- ensure that you have received safety Induction by Lucas Group before you start work.
- ensure you understand the safe method of work (i.e. method statements), risks and control measures for the tasks that you undertake. Whenever you are not sure of particular safety requirements ask your supervisor for clarification.
- take reasonable care for the health and safety of yourself and of other persons who may be affected by your acts, or omissions at work.
- report any hazards arising, including defective tools and equipment, to your supervisor immediately, and warn other persons that could be at risk.
- work in a safe manner at all times.
- report any injury to your supervisor immediately.
- wear or use the appropriate PPE specified, and not to intentionally or recklessly interfere with, or misuse anything provided in the interest of health, safety or welfare.



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SUB CONTRACTORS

Subcontractors must:

- comply with all relevant requirements of this policy, and in particular, the “subcontractors” section within the arrangements section of this policy.
- carry out their works efficiently and safely and strictly in accordance with the requirements of the Health and Safety at Work Act 1974, statutory requirements, regulations and codes of practices.
- carry out risk assessments for all their activities and to devise and put in place appropriate risk control measures. Written records of these to be approved by Lucas Group before starting work.
- devise safe methods of work (method statements) for all their activities. Written records of these to be approved by Lucas Group before starting work.
- manage their operations on site such that all works are carried out in accordance with the safe systems of work.
- observe all Lucas Group rules and regulation.
- set-up and maintain an efficient and adequate system of first aid and welfare facilities for their employees, unless share welfare facilities are provided by others.
- maintain good and safe working relationships with S. Lucas clients and fellow Sub Contractors.
- ensure that their actions do not result in hazard conditions for other persons who may be working in the same area.
- ensure that work is carried out by suitable and competent operatives and to ensure that they are properly supervised and trained.
- ensure that all employees of Sub-Contractors to receive Lucas Group safety induction before they start work.
- reprimand and discipline any of their employees who are careless in regard to their own or others safety.
- provide appropriate PPE and ensure it is used correctly at all times.
- report all hazards or accidents encountered by their employees to Lucas Group management as soon as possible.

SAFETY, QUALITY AND ENVIRONMENT (SQE) MANAGER

The SQE manager is responsible:

- to advise Lucas Group (in association with specialist consultants where appropriate) on matters relating to safety and health, i.e., relevant legislation, codes of practice and guidance material; fire precautions; the suitability of safety equipment, and accident reporting procedures.



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- to monitor by inspection Lucas Group work places and accommodation, and the safety and health performance of employees and to report on such inspections.
- to prepare statistical analysis in accidents, with recommendations on preventative measures.
- to investigate and report on major injuries, notifiable dangerous occurrences, other accidents and incidents.
- to promote good working relations with the Health and Safety Executive and other enforcing authorities and to strive at all times to achieve with the co-operation of management, compliance with current legislation.

ARRANGEMENTS & PROCEDURES

RISK ASSESSMENTS AND METHOD STATEMENTS

Specific regulations

Health and Safety at Work Act (1974)

Management of health and safety at work regulations (1999)

The regulations require employers to assess risks to all who may be affected by their undertaking. The Health and Safety at Work Act (1974) also requires that safe systems of work be devised for all company operations.

Lucas use method statements to define safe systems of work. These are recorded using the company "method statement template" which is included in the controlled document set (see section "Controlled safety documents").

Risk assessments must be suitable and sufficient, which means they must:

- Identify the significant risks and ignore trivial ones;

- Identify and prioritise the measures required to comply with any relevant statutory provisions;

- Be reviewed if there is reason to believe they are no longer valid.

The following regulations require specific risk assessments:

- Ionising radiation regulations (1999)

- Control of asbestos regulations (2006)

- The control of noise at work regulations (2005)

- Manual handling operations (MHO) regulations (1992 am. 2002)

- Health & safety (display screen equipment) regulations (1992)

- The personal protective equipment at work (PPE) regulations (1992 am. 2002)

- The confined space regulations (1997)

- Work at height regulations (2005)

- Regulatory reform (fire safety) order (2005)

- The control of vibration at work regulations (2005)

- Control of lead at work regulations (2002)

- Control of substances hazardous to health (COSHH) regulations (2002 am. 2005)

Most risk Lucas risk assessments are recorded using the company "risk assessment template" is included in the controlled document set (see section "Controlled safety documents"). Special formats are used for some assessments (for example, COSHH risk assessments).

A risk assessment is recorded for each of the following:

- Operations at head office,

- Operations at the company logistics centre,

- Personal protective equipment (in line with the PPE regulations),

- Manual handling operations (in line with the manual handling regulations),

- Fire risk assessments for head office and the logistics centre,

- Risk assessments for use and handling of any substances controlled under the COSHH regulations,

- A risk assessment covering the operations controlled by each method statement

Any work carried out on site shall require a specific method statement and risk assessment. All persons who are to carry out the work shall be briefed on the method statement and risk



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assessment before starting work, and shall sign a "method statement briefing register" (see the controlled safety documents section in this manual) to confirm that they understand them, and to act as a record of the briefing.

It may happen that due to changes in circumstances or requirements, it may become necessary that a method statement and/or risk assessment should be revised. Any such revision shall require another staff briefing, and the signing of another briefing register.

Work requiring a method statement will be supervised by a competent manager/supervisor, who shall check that the required procedures and methods are followed.



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FIRE AND OTHER EMERGENCY PROCEDURES

Specific regulations

Regulatory reform (fire safety) order (2005)

Fire risk assessments in (line with the requirements of the regulations) are made for the company's premises (head office and the logistics centre). They are reviewed as necessary, and included in the controlled document set (see section "Controlled safety documents").

Maps showing evacuation routes and assembly points are displayed on notice boards in each building.

Fire marshals are appointed and trained. They are not required to put themselves at any increased risk in carrying out their duties as fire marshals. Their duties are, where appropriate in case of emergency, to:

- Assist all persons to calmly evacuate to assembly points.
- Call the emergency services.

Marshals are trained in techniques to extinguish small fires, and may do so provided they do not expose themselves or others to undue risk.

Emergency evacuation drills are carried out every 6 months, and a record is kept.

Company vehicles that carry goods carry suitable fire extinguishers.

On sites where a Lucas Group company is the principal contractor, emergency procedures shall be devised, and recorded in method statements, or where the project is "notifiable" under health & safety (construction design and management) (CDM) regulations (2007), recorded as part of the construction phase health and safety plan. Thus the procedures shall be communicated to all on site during induction training and method statement briefings. On sites where Lucas are not the principal contractor, all Lucas personnel shall cooperate with the lead contractors arrangements. Lucas site managers shall brief all Lucas personnel during induction training.



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ACCIDENTS (INC FIRST AID)

Regulations

Reporting of accidents diseases dangerous occurrences (RIDDOR) regulations (1995).

The Lucas group "Accident & Incident Investigation & Reporting" procedure is included in the controlled document set (see section "Controlled safety documents"). All accidents, incidents and near misses on site must be reported to the Lucas site manager, who is then responsible to ensure that the procedure is carried out.

In line with the health and safety (First-aid) regulations, an "appointed person" is chosen for each of the company's premises, who is responsible for first aid equipment, and who will act in cases of emergency, or injury, and where necessary, call the emergency services. On site, the site manager shall be the appointed person. Although not expressly required by the regulations, anyone likely to act as an "appointed person" shall undergo a health and safety executive approved first aid training course.



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CONSULTATION AND COMMUNICATION

Specific regulations

Safety representatives and committees regulations (1977)

Health and safety (consultation with employees) regulations (1996)

Lucas Group safety policy and procedures will be communicated to employees via:

- Induction training for all employees joining the company. All employees and sub contractors before starting work on every site receive induction training by Lucas.
- In service training.
- Safety Information Sheets, i.e. COSHH Assessments, Risk Assessments, Method Statements and Manufacturer's Safety Data Sheets.
- Personal contact by managers, supervisors and safety advisers
- Tool box talks.
- Any elected safety representatives.
- In addition the full policy and procedures manual s available to all via the company's website.

In line with the regulations the approved codes of practice and guidance notes:

- Every facility will be afforded to officially appointed Safety Representatives and or Committees. They will be invited to attend any meeting or discussion concerning health, safety and welfare matters.
- It is made clear during induction training (prior to starting work on every project) that employees, and contractors should discuss any concerns with supervision before starting or continuing to work.
- In addition, consultation with our employees will take place as required by them.
- Consultation shall involve listening to employees' views, and taking them into account.

COMPETENCE AND TRAINING

Specific regulations

Management of health and safety at work regulations (1999)

Lucas has a duty to ensure the competence of all who carry out its undertakings (this is a requirement of the health and safety at work act). "Competence" may be interpreted to mean that each person should have sufficient:

Knowledge,
Ability,
Training and
Experience

to carry out their duties safely and effectively. It is implied therefore that persons with less experience should be more closely supervised.

Lucas arranges training as required to ensure and maintain competence of staff. Training is delivered by competent Lucas Group personnel, or by approved external organisations. The company lists minimum qualification requirements for staff in particular positions within the organisation, and for staff performing certain operations. The list is called "staff training requirements" is included in the controlled document set (see section "Controlled safety documents").

Lucas Group require that all employees and sub contractors receive induction training on site prior to starting work, and to sign an induction training register as a record. This register is included in the controlled document set (see section "Controlled safety documents"). This training shall normally be delivered by our site manager. Content of the induction will include but not be limited to the following:

- Outline the work being carried out on site.
- Site Rules that will include drug and alcohol abuse, disciplinary procedures, signs and notices, emergency procedures etc.
- First aid facilities and the identities of those trained to give first aid.
- The dangers of, and procedures for, working at height.
- Arrangements for consultation with all employees regarding health and safety matters.
- The need to co-operate with others working on the site.

Further guidance on the content of induction training is given in the Lucas "site induction training checklist" which is included in the controlled document set (see section "Controlled safety documents")

All persons who are to carry out work controlled by a method statement shall be briefed on the content and the associated risk assessment, and sign the "method statement briefing register" to confirm their understanding, and to act as a record. This register is included in the controlled document set (see section "Controlled safety documents").

On site, "toolbox talks" are regularly delivered to operatives by the site manager. These are made relevant to the particular conditions and operations on site. The company maintains a collection of suitable talks that serve as a basis from which to effectively deliver information and training. These talks are included in the controlled document set (see section "Controlled safety documents").



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WORKING AT HEIGHT

Specific regulations

Work at height regulations (2005).

Working at height is defined as working at any height from which a fall could cause personal injury.

The regulations require that work at height is:

- avoided if it is reasonably practicable to do the work another way,
- carried out using appropriate equipment to prevent falls,
- organised so that the distance and possible consequence of a fall are minimised,
- risk assessment based,
- properly planned and supervised by competent persons,
- carried out by competent operatives

In the course of their usual operations, Lucas operatives need to access places inside and outside buildings from which a fall could cause injury. The distance of a potential fall could be for example, depending on circumstances, the height of the building, the height of a ceiling, or falling onto the floor from a standing position. Slip and trip hazards caused by stored materials, ground works and stored materials are common on construction sites.

Following risk assessments, and where work at height cannot be avoided, Lucas shall use competent persons to specify the safest reasonably practicable methods and equipment to enable such work (see section "Risk assessments and method statements"). Work must be carried out and supervised by competent persons (see section "Competence and training"). Competence shall be continually reinforced by means of toolbox talks.

Access equipment

Any item of access equipment must have marks that identify it uniquely. It shall be subject to regular inspections that shall be recorded, and in addition, shall be visually inspected by the user before each use. In addition to other requirements, equipment should be inspected after any event likely to have affected its structural integrity (for example, impact with plant or other equipment, or exposure to extreme weather conditions. Persons competent to specify or use of equipment shall (by definition) be familiar with regulatory, trade, and manufacturers instructions and recommendations for safe use.

Ladders, stepladders, "hop ups", trestles and lightweight staging.

These should not be used where it would be reasonably practicable to use a safer type of equipment that encloses the user with guard rails. However they do have application where other equipment is not suitable for reasons of space, the need to access certain restricted positions, or where the operation is of such short duration and low risk, that the erection of other equipment is not justified.

Only equipment approved to Class 1 Industrial (heavy duty) or class 2 light trades (medium duty) under BS EN 131 may be used. Class 2 equipment should not be used on construction sites.

Equipment should be fitted with ladder tags that record dates of full inspections, and indicate when the next one is due. Full inspections are carried out every three months (or sooner) In addition daily inspections are also carried out and recorded. The inspection records are made using the appropriate forms from the controlled document set (see section "Controlled safety documents").

Podium steps

Podium steps are generally preferred to ladders, stepladders etc. as working platforms.

Equipment should be fitted with “scafftags” that record dates of full inspections, and indicate when the next one is due. Full inspections shall be carried out every seven days (or sooner). In addition daily inspections are also carried out and recorded. The inspection records are made using the appropriate forms from the controlled document set (see section “Controlled safety documents”).

Mobile towers and system scaffolds

These structures are the preferred system for many Lucas operations. In order to be considered competent to erect, dismantle, inspect or move them, persons must be trained as specified on the Lucas “staff training requirements” list, which is included in the controlled document set (see section “Controlled safety documents”).

Equipment should be fitted with “scafftags” that record dates of full inspections, and indicate when the next one is due. Full inspections are carried out upon assembly, and every 7 days (or sooner). In addition daily inspections are also carried out and recorded. The inspection records are made using the appropriate forms from the controlled document set (see section “Controlled safety documents”).

Mobile elevating work platforms (MEWPS) and cradles

MEWPS (usually cherry pickers or scissor lifts) structures are the preferred system for many Lucas operations. Cradles are occasionally used to meet particular access requirements. In order to be considered competent to use, inspect or move them, persons must be trained as specified on the Lucas “staff training requirements” list (see the controlled safety documents section in this manual).

MEWPS and cradles are covered by the requirements of the “LOLER” (lifting operations and lifting equipment) regulations. Planning of lifting operations is required, and achieved using method statements (see section “Risk assessments and method statements”) and competent supervision on site. The thorough six monthly inspections required under LOLER are carried out by competent consultants, and records maintained in site files.

Risk assessments and method statements must consider and establish means of rescue in the event of equipment failure.

Additionally, inspections are carried before use, and every 7 days (or sooner). In addition daily inspections are also carried out and recorded. The inspection records are made using the appropriate forms from the controlled document set (see section “Controlled safety documents”).

Persons in baskets of MEWPS or in cradles must always wear a harness attached to either a work restraint or fall arrest lanyard, as appropriate to the design of the basket, and the nature of the operation.

Fall arrest and work restraint lanyards

Where used, work restraint lanyards must be so as to prevent the user reaching a position where he or she could fall. Fall arrest lanyards must not be used unless the distance of a potential fall is sufficient for the system to reach its full extension before the user would hit the floor. Risk assessments must consider arrangements to rescue a user in the event of suspension from the lanyard as quickly as possible, and certainly within 5 minutes (suspension trauma can cause loss of consciousness within 5 to 20 minutes, and research suggests that suspension for as little as 10 minutes and typically 15 to 40 minutes) can result in death).

Full inspections shall be carried out every six months (or sooner). In addition, the equipment must be carefully inspected before each use. The inspection records are made using the appropriate forms from the controlled document set (see section “Controlled safety documents”).



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Tube and fitting scaffold

Where required, tube and fitting scaffolds shall be provided by competent sub contractors. Lucas shall check their competence and safe systems of work (see section "Subcontractors").

Persons other than the competent builders of a scaffold must not alter the structure in any way.

At times, Lucas personnel may be afforded access via scaffold under the control of others. Lucas site management must inspect the scaffold before use, check that the scaftag is present, and that required inspections have been carried out.



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PERSONAL PROTECTIVE EQUIPMENT (PPE)

Specific regulations

The personal protective equipment at work (PPE) regulations (1992 amended 2002)

Lucas group have carried out a risk assessment to determine suitable types of personnel protective equipment for use by Lucas employees engaged in common company operations. This assessment is recorded as the document entitled "PPE Assessment" which is included in the controlled document set (see section "Controlled safety documents").

Each activity carried out by the company is subject to individual risk assessment and the establishment of a safe method or work (see section "Risk assessments and method statements"). These assessments may specify a requirement for different or additional items of PPE, and in such cases, these specific assessments and recommendations take precedence over the "PPE assessment" for common operations referred to above.

Where risk assessments determine a requirement, Lucas group will supply PPE free of charge to employees, although they may use their own equipment, provided the site manager agrees that it is to the required specification and in serviceable condition.

Persons who are to use PPE are informed and instructed on the hazards and correct use, during the recorded method statement briefings. They are required to take care the equipment, and to report any defect to Lucas Group site management.



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MANUAL HANDLING

Specific regulations

The manual handling operations at work (MHO) regulations (1992 amended 2002)

Lucas group have carried out a risk assessment for common company manual handling operations. This assessment is recorded as the document entitled "Manual handling assessment" and is included in the controlled document set (see section "Controlled safety documents").

Each activity carried out by the company is subject to individual risk assessment and the establishment of a safe method or work (see section "Risk assessments and method statements"). These must assess risks and develop safe systems of work where it is anticipated that manual handling operations may be required that are not covered by the "Manual handling assessment".



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CONTROL OF SUBSTANCES HAZARDOUS TO HEALTH (COSHH)

Specific regulations

Control of substances hazardous to health regulations (COSHH) (2002 amended 2007).
The CHIP (Hazard Information and Packaging for Supply) Regulations 2002

Note that exposure to asbestos or lead is not considered in this section because they are covered by specific regulations. Please refer to section "Lead", and section "Asbestos".

schedule 1 of the CHIP regulations defines substances considered hazardous to supply. Substances so defined must be supplied with safety data sheets.

Use or exposure to these substances is regulated by the COSHH regulations.

Where Lucas Group work with materials so defined, risk assessments are carried out. These assessments consider not only the hazards defined on the relevant safety data sheet for the substance, but also the specific processes that shall be employed, and the expected conditions of use (for example, ventilation arrangements).

These risk assessments are recorded using the COSHH assessment template from the controlled document set (see section "Controlled safety documents"). These assessments determine control measures required for safe use.

The Company also considers hazards arising from materials the course of its operations, for example, the production of dust during cutting or flattening operations. Such hazards are considered during the specific risk assessments carried out for each operation (see section "Risk assessments and method statements").

Persons who are to use or who could be affected by the substances are informed and instructed on the hazards and control measures, during the recorded method statement briefings.

Health surveillance

It is considered unlikely that the Lucas Group in the course of its operations shall cause exposure of people to substances such that COSHH regulations would require health surveillance of those people (ie exposure to a substance defined in schedule 6 of the COSHH regulations, or one that is associated with an identifiable related adverse health effect for which there are valid means of detection). If the possibility of such exposure arises, it shall be considered in specific risk assessments and action taken in line with relevant regulations. Note that exposure to lead or asbestos is not considered in this section because they are covered by specific regulations. Please refer to section "Lead", and section "Asbestos".

LEAD

Specific regulations

Control of lead at work regulations (2002)

The regulations require that a specific risk assessment must be carried out before any work is done with lead, compounds of lead, or substances containing lead or compounds of lead.

Paints used on buildings can contain lead. With a few exceptions, paints manufactured after 1970 do not contain lead, the exceptions include some primers, and some paints intended for use in the restoration of old buildings.

When consideration of the above indicates that work may include the sanding or removal of paints containing lead, Lucas Group shall arrange for samples to be tested to determine the concentration of lead in the paint.

If lead is indeed present, then the regulations require that a specific risk assessment must be performed before any work is done on the paint.

The regulations define that:

"significant" in relation to exposure to lead means exposure in the following circumstances -

- (a) where any employee is or is liable to be exposed to a concentration of lead in the atmosphere exceeding half the occupational exposure limit for lead;*
- (b) where there is a substantial risk of any employee ingesting lead; or*
- (c) where there is a risk of contact between the skin and lead alkyls or other substances containing lead which can be absorbed through the skin;"*

Lucas may approach the health & safety executive to ask whether in their opinion, the job is likely to result in "significant" exposure.

The following controls shall apply in any case when working with lead (whether exposure is likely to be significant or not):

- All persons likely to be in the work area shall be given a copy of the leaflet ref INDG 305 "Lead & you" published by the health & safety executive.
- Women or persons under 18 years of age shall not be allowed in the work area.
- In addition to the usual induction training, method statement / risk assessment briefing, training based on the Lucas Group toolbox talk "working with lead" to be given to all relevant employees (in line with the regulations).
- Any sanding or other processes likely to produce dust to be done wet, and the residue removed with a damp rag. The rag, abrasive paper and all other debris placed in a sealed, plastic bag for disposal.
- Removal using heat is allowed, but the temperature of the paint must not scorch or burn, so flames must not be used. Careful heating using temperature controlled hot air guns set to deliver air at below 450°C, or the use of infra red systems may be used, and the softened paint film removed before it hardens again.
- Removal using chemical strippers is allowed (specific respiratory protective equipment may be required).
- Exposure to dust and debris to be minimised by wearing protective clothing, gloves and where appropriate, a face mask fitted with a respiratory protective device with filter conforming to EN143 P2.
- All debris (removed paint, sandpaper, rags used for cleaning off residues, used chemical strippers) must be placed in sealed, plastic bags, and disposed of in line with the



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Hazardous Waste (England and Wales) Regulations 2005 (refer to the Lucas Group environmental management system for more detail).

Where the job is likely to result in "significant" exposure (as defined above) the following shall also apply:

- Lucas Group shall arrange medical surveillance for employees likely to experience significant exposure, using doctors practising in this specialist medical field who are familiar with the regulations.
- Action shall be taken in line with the regulations and doctor's recommendations if monitoring determines that concentration of lead in the blood rise to the defined action level or suspension level. The regulatory requirements that apply if these levels are reached are summarised below:

Regulatory requirements at blood concentration "action levels" and "suspension levels"

The "action levels" for lead are:

Women of reproductive capability:	Young persons (aged 16-17):	Any other employee:
25 micrograms of lead per decilitre of blood	40 micrograms of lead per decilitre of blood	50 micrograms of lead per decilitre of blood.

If medical surveillance detects blood-lead concentrations at or above these action levels, the employer must:

- recognise that the employee's blood-lead level is near the 'suspension level'
- investigate the effectiveness of existing control measures and take the necessary actions to reduce employees' blood-lead levels below the action level
- prevent the blood-lead level of affected employees from reaching the suspension level.

The "suspension levels" for lead are:

Women of reproductive capability:	Young persons (aged 16-17):	Any other employee:
30 micrograms of lead per decilitre of blood	50 micrograms of lead per decilitre of blood	60 micrograms of lead per decilitre of blood.

If medical surveillance reveals that an employee's blood-lead level has reached or exceeded the levels outlined below, a doctor must decide whether to temporarily suspend them from work that exposes them to lead:

In such circumstances, the employer must:

- ensure that a doctor makes an entry in the health record of affected employee(s) as to whether, in the doctor's professional opinion, they should be suspended from further work liable to expose them to lead,
- review the relevant risk assessment,
- review the actions taken to prevent exposure to lead,
- provide for a review of the health of any other employees who may have been similarly exposed.

If the doctor thinks that there is no need to suspend the affected employee(s) from work, the doctor must note in their health records:

- the reasons for that decision
- any conditions under which working with lead may continue.

Doctors practising in this specialist medical field are familiar with the regulations, and if there are some exceptions to the rule, such doctors will be able to explain them. An employer must act on the



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doctor's decision and an employee will not be able to work with lead again or be exposed to it until the doctor considers it safe to do so.



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ASBESTOS

Specific regulations

The control of asbestos regulations (2006).

The regulations cover the management of and working with asbestos or asbestos containing materials ("ACM"s).

Licensable and non-licensable work

Only "licensed contractors" may carry out "Licensable work" (Lucas Group companies are not "licensed contractors"). The regulations define work that is licensable. Any work with the following materials is licensable:

- Asbestos insulation
- Coatings (except textured decorative coatings and paint)
- Asbestos insulation board

Any work where asbestos fibres could be released into the air could also be licensable.

Some "ACM"s are such that the asbestos fibres are firmly linked to the base matrix material. These materials include some (but not all) types of the following:

- Fibre/cement boards (asbestos cement),
- textured decorative coatings (like "Artex"),
- paints,
- roofing felt,
- damp proof course
- gasket materials

and many others.

Work with materials where the asbestos fibres are firmly linked to the base matrix material is usually non-licensable, provided that exposure is sporadic and of low intensity, and the risk assessment clearly states that the "control limit" for exposure shall not be exceeded. Work with these materials would normally meet these conditions provided that the materials are in sound condition (so as not to release fibres) and provided that no operations are carried out that would release fibres, such as grinding, sanding, cutting, crushing or breaking up.

If there is any doubt regarding a material or an operation, work must not be carried out before obtaining specialist advice. In the first instance, by contacting the health & safety executive for guidance.

Recognising the presence of asbestos or "ACM"s

Any building built before 1999 may contain asbestos or "ACM"s. Regulations have prohibited the use of such materials since 1999.

Under the regulations, any person who owns, manages or has responsibility for all or part of non domestic premises that may contain asbestos must identify and assess the location and condition of the materials and assess potential risks. They must provide this information to anyone who is liable to work on the materials or disturb them.

If a project is "notifiable" under the construction (design and management) regulations 2007 ("CDM regulations"), then the CDM coordinator must make sure that the above information is distributed to contractors via the principal contractor. If the project is not "notifiable", then Lucas Group must obtain the information from the principal contractor, or where a Lucas Group company is the principal contractor, directly from the client.



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When consideration of the above indicates that asbestos or “ACM”s may be present (including any domestic building built before 1999), employees must be briefed on the location of those materials (if known) and any potential risks. During induction training, they must be trained, using the Lucas Group toolbox talk “Asbestos and asbestos containing materials”. This should enable them to recognise materials that could contain asbestos, and what action they should take if they should find any.



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ELECTRICITY AND PORTABLE ELECTRICAL APPLIANCES

Specific regulations

The electricity at work regulations (1989)

Lucas Group shall entrust any electrical work or installation requiring the expertise of a competent electrician to competent subcontractors.

Normally all electrical equipment used on site shall use a 110 Volt supply from transformers with centre earth tapping, or other safe systems such as low voltage battery power. If exceptionally it is required to use other equipment, then risk assessments and safe systems of work (method statements) would be devised and carried out by competent persons.

Equipment must be stored securely so that it cannot be tampered with by others.

Testing and inspection

"PAT" testing

All portable electrical appliances must be thoroughly inspected and tested by a competent person when issued from the stores at the Lucas Group logistics centre, and at least every three months whilst in use, in line with health and safety executive guidelines for portable appliances used on construction sites.

This testing shall include:

- Visual inspection for damage to casings, cables and connectors,
- Ensuring that cables and terminations are secure,
- For double insulated equipment, testing the insulation between the supply terminals and any exposed parts,
- For earthed equipment, testing continuity of paths to earth, and the insulation between the supply and earth terminals,
- Correct operation of functioning parts.

Equipment shall be marked with the date of the inspection, and separate records maintained, identifying the status of each item.

Visual inspection before and during use

Before each use, the operator should visually inspect the appliance to check:

- for damage to casings, cables and connectors (including extension leads),
- that cables and terminations are secure,
- that the equipment is not wet (unless designed to be used wet),
- that all functioning parts operate correctly,

CONFINED SPACES

Specific regulations

The confined spaces regulations (1997)

The regulations require a specific risk assessment must be carried out before any working in a confined space as defined in the regulations.

The regulations define a confined space as follows:

"confined space" means any place, including any chamber, tank, vat, silo, pit, trench, pipe, sewer, flue, well or other similar space in which, by virtue of its enclosed nature, there arises a reasonably foreseeable specified risk;"

where a "specified risk" is defined as:

" a risk of -

(a) serious injury to any person at work arising from a fire or explosion;

(b) without prejudice to paragraph (a) -

(i) the loss of consciousness of any person at work arising from an increase in body temperature;

(ii) the loss of consciousness or asphyxiation of any person at work arising from gas, fume, vapour or the lack of oxygen;

(c) the drowning of any person at work arising from an increase in the level of a liquid; or

(d) the asphyxiation of any person at work arising from a free flowing solid or the inability to reach a respirable environment due to entrapment by a free flowing solid"

The regulations require that no person shall enter confined spaces unless it is not reasonably practicable to achieve that purpose without such entry.

However it is conceivable that Lucas Group operations could require work in confined spaces. For example, spraying of paint could present a "specified risk" if carried out in an area where access and egress is difficult or restricted.

As with all operations, only competent staff should be engaged on the work or its management and supervision (see section "Competence and training").

The regulations require that:

"no person at work shall enter or carry out work in a confined space unless there have been prepared in respect of that confined space suitable and sufficient arrangements for the rescue of persons in the event of an emergency, whether or not arising out of a specified risk."

Method statements and risk assessments must cover this activity (including risks to people potentially involved in rescuing others), and must consider procedures and equipment for resuscitation if this could be required.

Method statements must arrange for constant monitoring of those inside the confined space, by responsible persons outside, including adequate and effective communication between them.

To ensure a "safe method of work" it would normally be necessary to operate a "permit to work" system control entry to the confined space. Permits would be issued only by competent persons, and



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only after they have ensured that all steps are adequately planned, that all foreseeable hazards have been considered, and that adequate controls and rescue facilities are in place.



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ABRASIVE WHEELS

Specific regulations

The provision and use of work equipment regulations (PUWER) regulations (1998 amended 2002)

The regulations cover the use and maintenance of machines using abrasive wheels.

Lucas Group operations may include cutting or grinding operations using abrasive wheel machines. These may typically be:

- Hand held portable appliances such as angle grinders and disc cutters,
- Bench mounted disc cutting machines,
- Pedestrian controlled floor grinding machines.

All persons who use or maintain such equipment must be competent (see section "Competence and training").

Such operations are normally infrequent and of short duration, and so hazards associated with vibration shall therefore not usually be a significant, however each individual case should as a matter of course be considered when carrying out risk assessments (see section "Risk assessments and method statements").

Common hazards associated with this type of equipment are:

Flying debris or dust entering eyes,
Noise,
Dust entering respiratory system,
Abrasion of skin from the tool, or work,

Suitable PPE (personal protective equipment) shall be required. The specification shall depend on the type of tool, and the materials being worked, but shall often include:

- Full face shield or goggles to BS 166 class1,
- Abrasion resistant gloves to BS EN 388 5555,
- Hearing protection,
- Overalls,
- Safety boots,

Risk assessments must also consider people other than the user who could be in the vicinity.



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NOISE AND VIBRATION

Specific regulations

The control of noise at work regulations (2005)

The control of vibration at work regulations (2005)

Normal Lucas Group operations do not usually involve significant hazards associated with vibration. Although some portable equipment used can give rise to vibration, use is infrequent and of short duration. However, each individual case should as a matter of course be considered when carrying out risk assessments (see section "Risk assessments and method statements").

On occasions, work may give rise to significant levels of noise. Where this is anticipated, suitable hearing protection must be specified. Risk assessments must also consider people other than the operative, who could be in the vicinity.

Consideration must be given to noise created in Lucas work areas by other organisations. Hearing protection must be made available for such circumstances to protect Lucas Group personnel and their subcontractors.

In practice, it shall rarely be practicable to carry out sound level tests to determine whether levels are above the action limits written into the legislation, so Lucas Group's approach is to make hearing protection available and insist that it is used if it is suspected that noise levels may pose a significant hazard. Personnel should also be trained to use the hearing protection, and informed about the hazards using training based on the Lucas Group toolbox talk entitled "Noise".



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DISPLAY SCREEN EQUIPMENT

Specific regulations

The display screen equipment regulations (1992)

Lucas Group has carried out a risk assessment of office based activities, which includes an assessment of workstations with display screen equipment. The record of this document is in the controlled document set (see section "Controlled safety documents"). All workstations used by any one user for significant periods of time (for example for more than one hour each day) must comply with the requirements laid down in the schedule of the display screen equipment regulations (1992).

Requirements for display screen workstations, and hazards associated with the use of such workstations are summarised in the Lucas Group toolbox talk entitled "display screen equipment".

Eye and eyesight tests will be provided by Lucas Group to employees who use display screen equipment for significant periods if they request them, and will provide corrective appliances appropriate to the work on which the user is engaged, if the tests reveal that they are required.



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WELFARE

Specific regulations

The workplace (health, safety and welfare) regulations (1992 amended 2002)

The construction (health, safety and welfare) regulations (1996)

Employers have a duty under the health and safety at work act (1974) to ensure, in so far as is reasonably practicable, the welfare of employees.

Welfare provision may be defined, from the viewpoint of health and safety legislation, to include provision of:

- sanitary conveniences,
- washing facilities,
- drinking water,
- facilities for changing and accommodation of clothing,
- facilities for rest and eating meals,
- and first aid.

*Ref: Introduction to health and safety at work
P. Hughes MBE & e. Ferret
3rd edition published Butterworth Heinemann 2007
ISBN 978-0-7506-8503-0*

The workplace (health, safety and welfare) regulations (1992 amended 2002) (and the associated approved code of practice) give details of requirements for most work places, but do not apply to construction sites. These shall serve as minimum standards of provision for Lucas Groups premises, and would be considered when facilities are acquired or modified.

The construction (health, safety and welfare) regulations (1996) (and the associated health and safety executive construction information sheets CIS 18 and CIS 46) give details of requirements that apply to construction sites. These shall serve as minimum standards of provision for construction sites where a Lucas company is the principal contractor.

The following recommendations apply to construction sites:

- Sanitary conveniences and washing facilities,
 - The regulatory requirement is for sufficient and suitable facilities with hot and cold water, soap and facilities to dry after washing. There must be either separate facilities for men and women, or facilities, each for one individual that can be secured from the inside. Guidance recommends one facility per 25 workers,
- Drinking water,
 - Sufficient drinking must be supplied,
- Facilities for changing and accommodation of clothing
 - must include facilities to dry clothing, and should be secure.
- Facilities for rest and eating meals
 - Must be clean, and include facilities to boil water. Guidance recommends provision of the facility to heat food.
- First aid
 - Refer to section "Accidents and first aid"

SUB CONTRACTORS,

Specific regulations

The management of health and safety at work regulations (1999)

The health & safety (construction design and management) (CDM) regulations (2007)

Employers must ensure the competence of their subcontractors, and to supply them with sufficient instruction and information to carry out their duties safely and within the regulatory requirements.

Lucas Group use the following arrangements to fulfil these requirements:

Subcontractor questionnaire

The Lucas Group questionnaire

All new subcontractors are required to complete the questionnaire before being engaged. The questions are designed to establish their competence discover how they manage health and safety in their operations.

Record of subcontractor insurance details

All employers must have employers liability insurance as required by the Employer's liability (compulsory insurance) act (1969) and regulations (1998). It may be appropriate for subcontractors to hold additional insurance depending on their scope of operation, although this is not normally a legal requirement. Details (requested initially using the subcontractor questionnaire) are recorded in the Company accounts software. This software shall prevent the placing of an order on a subcontractor unless their insurance details are up to date.

CDM Construction phase health and safety plan

Where Lucas Group company is the principle contractor on a project that is "notifiable" under the health & safety (construction design and management) (CDM) regulations (2007), a copy of the Construction phase health and safety plan shall be given to the subcontractor. This plan shall include details of known risks and controls, emergency procedures, welfare arrangements and etc.

Pre start meetings

Pre start meetings are held with representatives of the subcontractor's management before they start work on the contract. The purpose of the meeting is to ensure that information regarding:

- Risks and safe methods of work,
- Emergency procedures,
- Project schedules and timescales,
- and commercial information,

are communicated between both parties

Details of the meeting are recorded using the "pre start meeting record form"

Risk assessment and method statement approval

The subcontractors risk assessments and methods are studied by Lucas Group project management. When they are satisfactory, approval is recorded using the Lucas Group "Method statement approval" form, which is included in the controlled document set (see section "Controlled safety documents").

Site management

Subcontractors are supervised by Lucas Group site management who ensure that they work in accordance with the method statements, and to Lucas Group standards.



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Project review

A formal review is held following each project undertaken by the Lucas Group. Performance of any subcontractors is assessed. Details from these assessments are recorded on the Lucas Group intranet, where details of subcontractors are organised, and available for reference when choosing subcontractors for future projects.



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YOUNG PERSONS

Specific regulations

The management of health and safety at work regulations (1999)

In line with the requirements of the Management of Health and Safety at Work Regulations 1999, Lucas Group shall take particular account of young worker's lack of experience, potential lack of awareness of existing or potential risks and their immaturity when we assess the risks to their health and safety.

Young persons shall not be allowed to operate plant, or work with hazardous materials (ie materials listed in schedule 1 of the CHIP (Hazard Information and Packaging for Supply) Regulations (2002) and supplied with safety data sheets), unless under direct supervision or are being trained by an competent person.



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VISITORS

Specific regulations

The management of health and safety at work regulations (1999)

Visitors on Company premises

The Lucas Group's premises are such that the presence and location of any visitors shall be obvious. Visitors should be accompanied at all times, and made aware of the emergency procedures (see section "Fire and other emergency procedures").

Visitors on construction sites

- All visitors to site shall be required to report to our Site Manager on arrival and "sign in".
- They shall be made aware of and obey the site rules.
- They must be made aware of the emergency procedures
- They shall be issued with and use any PPE necessary
- They shall be required to "sign out" before leaving site.



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CONTROLLED SAFETY DOCUMENTS

Documents used for records and to define procedures that have a bearing on health safety and welfare are all included in the Lucas Group controlled document set. When required for reference or use, these documents must be obtained by downloading from the Lucas Group intranet, using the controlled list, which is to be found there. Documents obtained in this way shall be up to date at the time of downloading.