Health, Safety & Other Policies and
Safety Management System

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1. Introduction

This Health & Safety Policy and Safety Management System has been prepared in accordance with Section 2(3) of the Health and Safety at Work etc. Act 1974. It sets out Uniti Scaffolding Ltd's policy, organisation and arrangements for managing occupational health, safety and welfare across all business activities undertaken in the United Kingdom.

This document reflects current guidance from the Health and Safety Executive (HSE), relevant NASC guidance, and aligns with the principles of BS EN ISO 45001:2018 to provide a structured, auditable and continually improving safety management system.

At Uniti Scaffolding Ltd, health, safety and welfare are considered integral to overall business performance and operational delivery. Achieving high standards of health and safety is recognised as being essential to successful project delivery, business continuity and long-term growth. Failure to effectively manage health and safety risks can result in harm to individuals, disruption to projects and associated loss. For this reason, health and safety is fully integrated into the way the Company plans, manages and delivers its work.

At Uniti Scaffolding Ltd, the role of the business extends beyond the erection of scaffolding. The Company enables construction projects to progress by providing safe, reliable and well-planned access solutions that support clients and other trades. This is achieved through a consistent and disciplined approach to planning, communication, supervision and execution.

This approach is defined internally as the Uniti Gold Standard, which underpins both operational performance and the Company's health and safety management system.

The Uniti Gold Standard is delivered through two connected functions within the business:

The Office Team — responsible for planning, organising and supporting operations
The Site Team — responsible for delivering work safely, competently and professionally

When both functions operate to the same high standard, work is delivered efficiently, risks are effectively controlled, and clients can rely on Uniti Scaffolding Ltd to perform safely and consistently.

The Uniti Gold Standard is built upon the following core principles:

Preparation — Work is properly planned, resources are organised, and operatives are fully prepared prior to commencing work
Quality of Scaffold — All scaffolds are safe, compliant and constructed in accordance with NASC guidance, design requirements and client specifications
Programme Support — Work is delivered in line with programme requirements, with flexibility and proactive planning to support the client's needs
Communication — Clear, timely and effective communication ensures that risks, issues and changes are properly managed
Discipline — Consistent standards, safe behaviours and professional conduct underpin all activities
Problem Solving — Risks and challenges are identified early and managed through practical, safe and effective solutions

Teamwork — Safe and successful delivery depends upon cooperation between all parties, including office staff, supervisors, operatives, clients and other trades

These principles are supported by a set of minimum expected behaviours, which apply to all employees and subcontract operatives:

attend work as expected and arrive prepared
work safely at all times
follow company procedures and safety controls
communicate hazards, risks and issues without delay
respect equipment, materials and the workplace
support colleagues and the wider project team
leave all work areas safe and in good order

Failure to meet these standards undermines both safety and operational performance and will be addressed in accordance with the Company's disciplinary procedures.

By embedding the Uniti Gold Standard within this Safety Management System, the Company ensures that health and safety is not treated as a separate function, but as a fundamental part of how work is planned, managed and delivered.

When these standards are consistently applied:

risks are effectively controlled
work is completed safely and efficiently
clients develop confidence in the Company's delivery
the business continues to improve and grow in a sustainable manner

At Uniti Scaffolding Ltd, every individual has a role to play in maintaining these standards. The effectiveness of the system depends on the contribution of all employees and subcontract operatives working together to deliver safe, consistent and professional outcomes.

1.1 Arrangements for reviewing and updating Policy & SMS

The Director responsible for Health and Safety is Andy Bowler, who, with the assistance of the Health & Safety Consultants, is responsible for keeping the Company up to date with developments in occupational health and safety: new and changing health and safety legislation, case law, and best practice.

This Policy and associated procedures shall be revised in accordance with any significant changes identified above and at least reviewed every 12 months, to ensure that it remains suitable, sufficient and effective for the nature, scale and risks of the business operations.

Any formal management reviews are recorded.

1.2 Revisions to System

Issue Three – 9th March 2022

- Complete policy review
- Update to TG20:21 — Various
- Review and update list of Regulations — Appendix A
- Revise scaffold design matrix wording — Appendix B

Issue Four – 9th March 2023

• Complete policy review	
• Update to SG4:22	Various
• Update to organisation chart	Clause 4.1
• Add reference to SG6:22	Clause 5.8.1
• Update to Coronavirus: Covid-19	Clause 5.8.9
• Update to new P.P.E Regulation 2022	Clause 5.13
• Review and update list of Regulations	Appendix A

Issue Five – 9th March 2024

• Complete policy review	
• Update add new logo formatting	
• Update to Organisation Chart	Clause 4.1
• Update to Preventing falls (inspection)	Clause 5.6
• Rewording Manual handling SG6	Clause 5.8.1
• Review list of Regulations	Appendix A
• Review and update Scaffold design Matrix	Appendix B

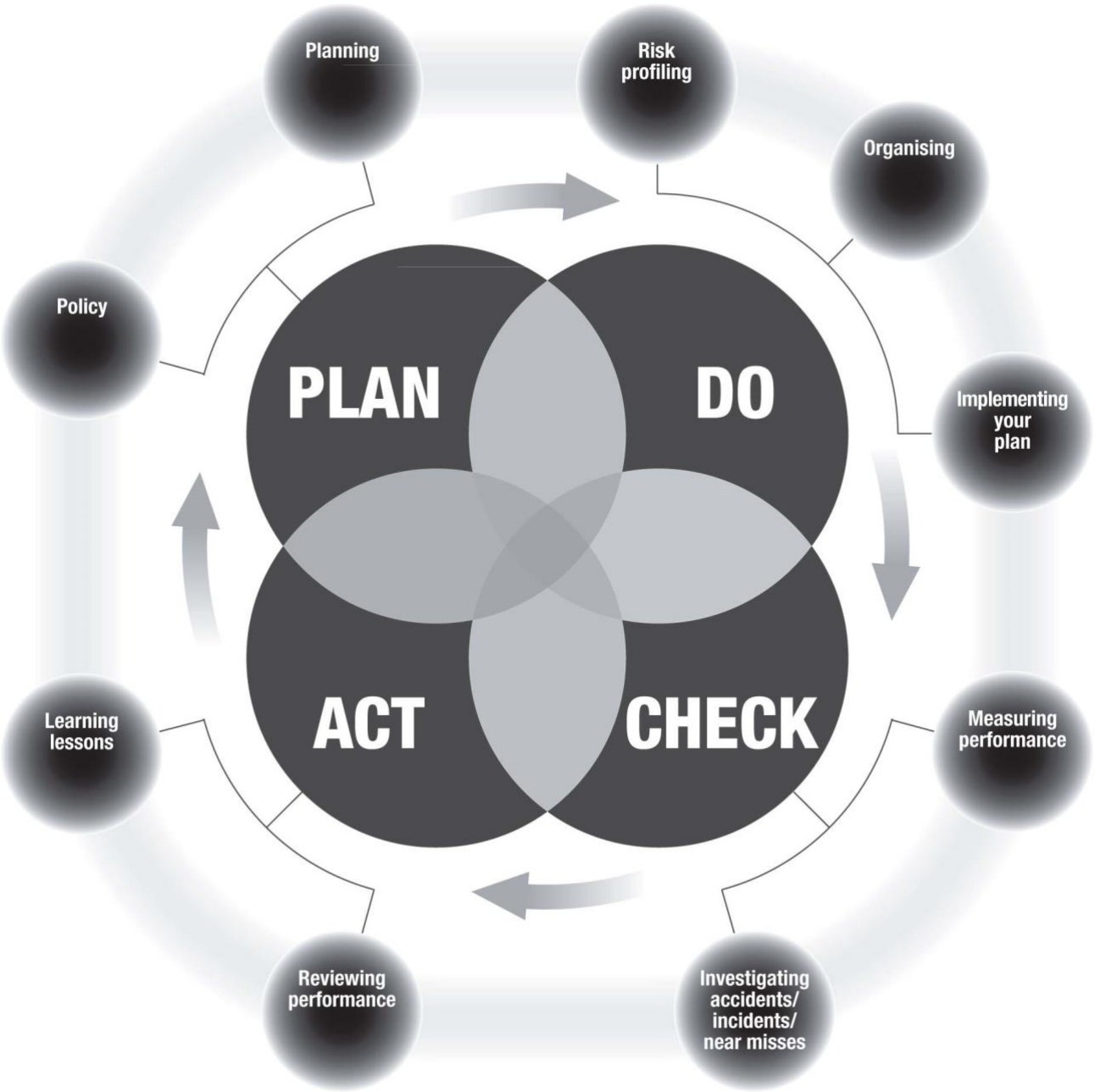
Issue Six – 9th March 2025

• Complete policy review	
• Update to include NASC TG30:24 System Scaffolding	Clause 5.2 Clause 5.4 Clause 5.6 Clause 5.14
• Add reference SG6 video via eportal	Clause 5.8.1
• Add reference to NASC SG5:18	Clause 5.9
• Add section on Lone Working	Clause 5.21
• Review list of Regulations	Appendix A

2. *Principles of the Uniti Scaffolding Ltd Safety Management System*

The Uniti Scaffolding Ltd Safety Management System (SMS) is based upon the Management of Health and Safety at Work Regulations 1999, and its Approved Code of Practice and a proven interpretation of the Health and Safety Executive's publication HSG65 2013 "Managing for Health and Safety" and BS ISO 45001: 2018 "Occupational health and safety management systems – Requirements" recommendations and including leadership and worker consultation.

The Diagram below (taken from HSG65) shows the principle of Plan, Do, Check, Act, which is followed in this Policy and Safety Management System.


Planning
Risk profiling
Organising
Implementing your plan
Measuring performance
Investigating accidents/ incidents/ near misses
Reviewing performance
Learning lessons
Policy
PLAN
DO
ACT
CHECK

3. *Policies*

'Written policies and the policy decision-making process of the organisation are covered in this element of the Safety Management System, these include the selection of resources and information, the design and operation of working systems and the design and delivery of products and services.

This document is the written policy of Uniti Scaffolding Ltd, creating a foundation for the Safety Management System and to fulfil Uniti Scaffolding Ltd's responsibility to its employees and others, by the spirit and letter of the law.

Uniti Scaffolding Ltd recognises that to be successful in achieving the high standards of health and safety performance it aspires to, we need an effective health and safety policy, which contributes to the overall business performance.'

Policy statements included in this document are as follows:

- Environmental Policy Statement (Policies numbered 13A-C, however new combined policy 13)
- Equality, Diversity & Inclusion Policy Statement (Policy 29)
- Modern Slavery & Ethical Labour Policy Statement (Policy 32)
- Anti-Bribery, Corruption & Facilitation of Tax Evasion Policy Statement (Policy 31)

The Policy and associated policies are communicated to all stakeholders.

3.1 Health & Safety Policy Statement

Uniti Scaffolding Ltd is committed to conducting its business and managing its work activities in a manner that prevents injury and ill health, and protects the health, safety and welfare of its employees, subcontract operatives, customers, members of the public and all others who may be affected by its operations, so far as is reasonably practicable. The Company also recognises its responsibilities towards all persons who may be present on its premises.

The Directors of Uniti Scaffolding Ltd are fully committed to ensuring, so far as is reasonably practicable, the health, safety and welfare at work of all employees and subcontract operatives. This commitment includes the provision of appropriate human, material and financial resources necessary to meet the Company's statutory duties and to support managers, supervisors and the workforce in discharging their health and safety responsibilities.

The Company will comply with the requirements of the Health and Safety at Work etc. Act 1974 and all other relevant statutory provisions. In addition, the Company will adopt recognised good practice, including relevant guidance issued by the Health and Safety Executive (HSE), the National Access and Scaffolding Confederation (NASC), and the principles of BS EN ISO 45001:2018, in support of continual improvement in health and safety performance.

Uniti Scaffolding Ltd will, so far as is reasonably practicable:

- provide and maintain safe systems of work, safe plant, equipment and places of work
- ensure the safe use, handling, storage and transport of materials and equipment
- provide employees and subcontract operatives with the information, instruction, training and supervision necessary for safe working
- appoint competent persons to assist in meeting legal duties and operational requirements
- consult with employees on matters affecting their health and safety
- provide suitable welfare facilities
- assess risks and implement appropriate control measures
- monitor performance, review arrangements and continually improve the effectiveness of the safety management system

All employees and subcontract operatives are required to act responsibly, to cooperate fully with this policy and all company health and safety procedures, and to take reasonable care for their own health and safety and that of others who may be affected by their acts or omissions.

The planning and implementation of this policy will be achieved through effective risk management, compliance with legal requirements, and the management arrangements set out within this Safety Management System.

This policy will be monitored on an ongoing basis and formally reviewed at least annually, or following significant organisational or legislative change, to ensure that it remains suitable, sufficient and effective.

Signed: 

Andy Bowler
Director responsible for Health and Safety

Dated: March 2026

3.2 Environmental Policy Statement

Uniti Scaffolding Ltd is committed to minimising the environmental impact of its operations and conducting its business in a responsible and sustainable manner. The Company recognises its duty to protect the environment and prevent pollution arising from its activities, so far as is reasonably practicable.

This commitment applies to all business operations undertaken across the United Kingdom, including yard activities, transport operations and site-based scaffolding works.

The Directors of Uniti Scaffolding Ltd are committed to ensuring compliance with all applicable environmental legislation and codes of practice, including the Environmental Protection Act 1990 and associated regulations, and to adopting recognised good practice in environmental management.

Uniti Scaffolding Ltd will, so far as is reasonably practicable:

comply with all applicable environmental legislation and codes of practice

minimise waste generation and promote reuse and recycling wherever practicable

use resources, including fuel, water and materials, efficiently

prevent pollution through the control of emissions, spills, noise and dust

ensure the safe handling, storage and disposal of materials and waste

work with clients, suppliers and subcontract operatives to promote sustainable practices

provide employees and subcontract operatives with the information, instruction, training and supervision necessary to carry out their work responsibly

monitor environmental performance and continually improve environmental management systems

All employees and subcontract operatives are required to cooperate with this policy, follow environmental procedures and controls, and report any environmental risks, incidents or concerns.

The Company will provide the necessary resources, management systems and supervision to ensure that this policy is effectively implemented.

This policy will be monitored on an ongoing basis and formally reviewed at least annually, or sooner where required due to legislative or organisational changes, to ensure that it remains suitable, sufficient and effective.

Signed: 

Andy Bowler
Director responsible for the Environment

Dated: March 2026

3.3 Equal Opportunities, Diversity and Inclusion Policy Statement

Uniti Scaffolding Ltd is committed to creating and maintaining a working environment in which all individuals are treated with dignity, fairness and respect. The Company is proud to be an equal opportunities employer and is committed to ensuring that no individual is disadvantaged or treated less favourably on the basis of personal characteristics.

This includes, but is not limited to, sexual orientation, gender identity, race, religion or belief, disability, age, nationality, or background.

The Company actively promotes equality, diversity and inclusion within its workforce and across the construction industry. All forms of discrimination, harassment, bullying or victimisation are unacceptable and will not be tolerated.

Uniti Scaffolding Ltd recognises that a diverse workforce brings different perspectives, skills and experiences that strengthen the business and support better decision-making, improved teamwork and safer outcomes.

This policy applies to all employees, subcontract operatives, agency workers, suppliers and any individuals representing the Company.

The Company will comply fully with the requirements of the Equality Act 2010 and all other relevant legislation, and will promote best practice in equality and inclusion across all areas of its operations.

Signed: 

Andy Bowler
Director responsible for Equal Opportunities, Diversity and Inclusion

Dated: March 2026

3.4 Modern Slavery and Ethical Labour Statement

Uniti Scaffolding Ltd is committed to conducting its business with integrity and to preventing modern slavery, forced labour, human trafficking and exploitation within its operations and supply chain.

The Company operates a zero-tolerance approach to any form of modern slavery and is committed to ensuring that all individuals working for, or on behalf of, the business are treated fairly, lawfully and with respect.

This policy applies to all business activities undertaken by Uniti Scaffolding Ltd across the United Kingdom, including all employees, subcontract operatives, suppliers and service providers.

The Company will comply fully with the requirements of the Modern Slavery Act 2015 and will adopt recognised good practice to identify, prevent and address risks associated with unethical labour practices.

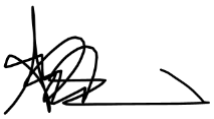
Uniti Scaffolding Ltd will, so far as is reasonably practicable:

ensure that all work is undertaken voluntarily and free from coercion

prohibit forced labour, human trafficking, debt bondage and child labour

ensure fair and lawful pay, working conditions and treatment for all workers

promote dignity, respect and equality across all areas of the business
implement appropriate controls within recruitment, employment and supply chain management
monitor compliance and take action where standards are not met
provide appropriate training and awareness to identify and manage risks
All employees and subcontract operatives are required to comply with this policy and to report any concerns relating to modern slavery or unethical labour practices.
The Company will provide the necessary resources, management systems and supervision to ensure that this policy is effectively implemented and maintained.
This policy will be monitored on an ongoing basis and formally reviewed at least annually, or sooner where required, to ensure its continued effectiveness.

Signed: 

Andy Bowler
Director responsible for prevention of Slavery and Human Trafficking

Dated: March 2026

3.5 Anti-Bribery, Corruption and Tax Evasion Policy
Policy Statement

Uniti Scaffolding Ltd is committed to conducting all of its business in an honest, transparent and ethical manner. The Company operates a zero-tolerance approach to bribery, corruption and the facilitation of tax evasion.

The Company is committed to acting professionally, fairly and with integrity in all business dealings and relationships, and to implementing effective systems and controls to prevent financial crime.

This policy applies to all business activities undertaken across the United Kingdom and to all individuals working for, or on behalf of, Uniti Scaffolding Ltd.

The Company will comply fully with all applicable legislation, including the Bribery Act 2010 and the Criminal Finances Act 2017, and will adopt recognised good practice to prevent bribery, corruption and tax evasion.

Uniti Scaffolding Ltd will:

conduct all business fairly, honestly and openly
not offer, give, request or accept bribes of any kind
not engage in or facilitate tax evasion in any form
only work with individuals and organisations that operate lawfully and ethically
maintain accurate financial records and transparent transactions
implement proportionate procedures to identify and manage risk
provide appropriate training and awareness to relevant personnel
monitor compliance and take action where standards are not met

All employees, subcontract operatives and those acting on behalf of the Company are required to comply with this policy and report any concerns.

The Company will provide appropriate resources, systems and supervision to ensure this policy is effectively implemented and maintained.

This policy will be monitored on an ongoing basis and formally reviewed at least annually, or sooner where required.

Signed: 

Andy Bowler
Director responsible for Anti-Bribery and Corruption

Dated: March 2026

4. *Organisation*

Organising for safety means delivering the four C's.

Control: Managers taking full control of health and safety as a line management responsibility. Health and safety is integrated into all day to day activities, ensuring that minimum performance standards are achieved through effective supervision.

Co-operation: Involvement and participation by individuals so that health and safety becomes a collaborative effort, soliciting the opinion of the workforce in health, safety & welfare issues.

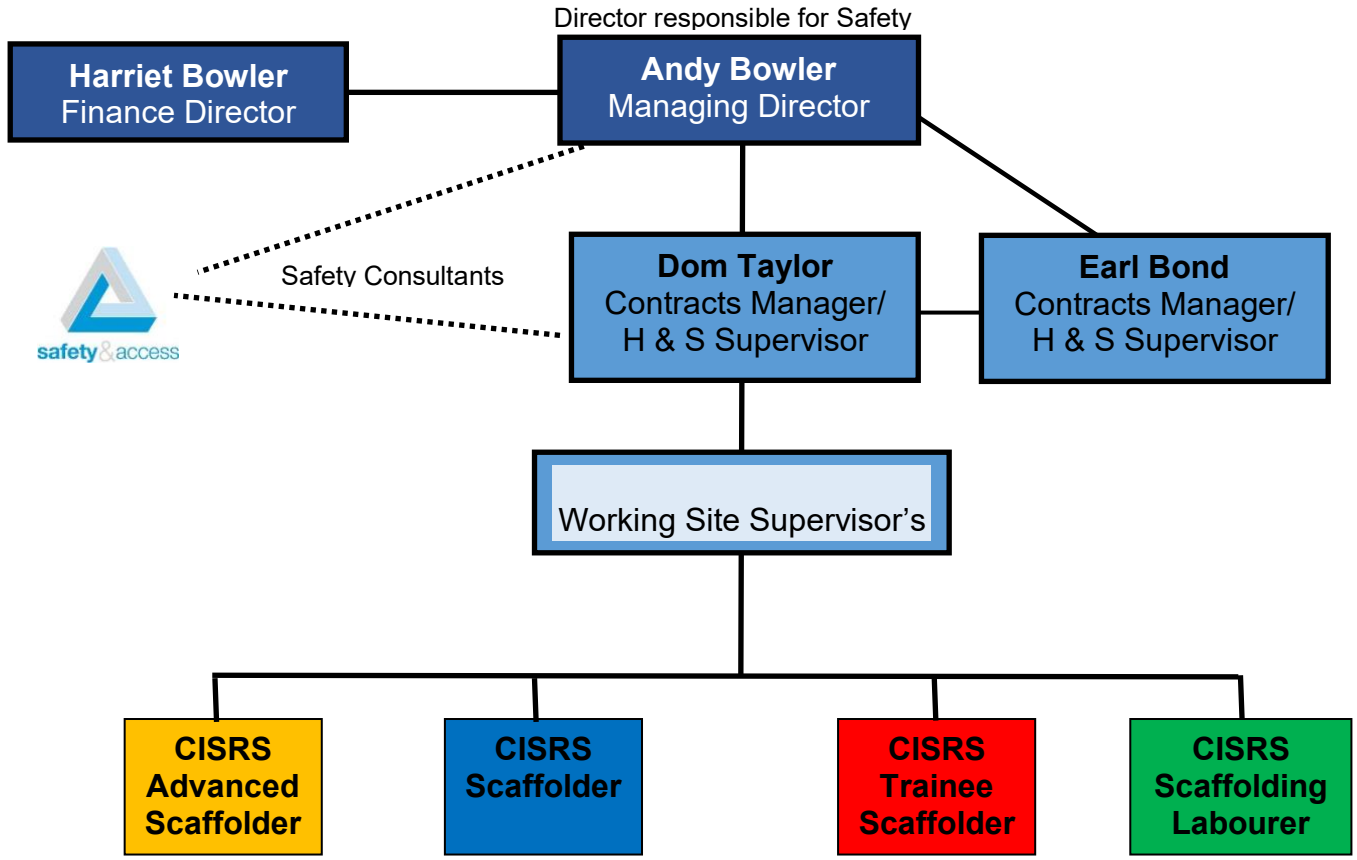
Communication: The written, verbal and visible communication of health and safety standards. The visible and active leadership of Managers and Supervisors is necessary to develop and maintain a culture supportive of health and safety management. The aim is not simply to avoid accidents, but to motivate and empower people to work safely, so that the visions values and beliefs of the board of directors become the shared responsibility and *'Common Knowledge'* of every employee/sub-contract operative.

Competence: Line-managers must be competent to manage safety. Uniti Scaffolding Ltd must ensure that minimum competency levels are identified and fulfilled so that everyone can make the maximum contribution to health and safety.

Roles and responsibilities are clearly defined.

4.1 *Organisation Chart*

As stated in the General Policy Statement the management of occupational health and safety at Uniti Scaffolding Ltd is a line-management responsibility, as the line-management, from the Director - through Managers to first line Supervisors are charged with controlling the business operations. Health and safety is an integral part of all our operations, therefore each member of the line-management is charged with managing health and safety within their sphere of operation. The following organisation chart defines the hierarchy within the Company: -



4.2 General Responsibilities for Managing Health & Safety

This section covers the basic general responsibilities for managing occupational health and safety at Uniti Scaffolding Ltd. Other documents also contain specific responsibilities for health and safety, these include: -

- Work Instructions
- Job Descriptions
- Risk Assessments & Method Statements

4.2.1 Director responsible for safety

The Director responsible for safety has ultimate responsibility for health safety and welfare at Uniti Scaffolding Ltd. He must also ensure that adequate financial and time resources are available to meet the requirements of this policy and other Company safety procedures and set a personal example.

The Director with this prime responsibility is Andy Bowler (assisted on a day to day basis by Georgina Hoskin H & S Supervisor). He is responsible for bringing the policy to the attention of all management, employees and sub-contractors and ensuring compliance through monitoring arrangements.

This Policy is a live document, which needs to be reviewed from time to time to ensure that it remains current with the Company's activities and changing legislation. It is the responsibility of the Director responsible for safety, with the assistance of the Independent Safety Consultants, to assess the implications of new legislation and best practice, to produce investigation/audit reports, monitoring systems etc, for the Company and to amend the Policy as necessary.

Throughout the organisation, the visible and active leadership of the Directors and Managers, through to first-line Supervisors, is necessary to develop and maintain a culture supportive of health and safety management. This demonstrates an organisation that operates visible leadership.

Line Managers have direct control and responsibility for health and safety management within their sphere of operation, for securing compliance with this Policy and Safety Management System.

4.2.2 Directors

At Directors level, there is accountability to the Board of Directors for the installation, enforcement and practical implementation of the company safety policy, the health and safety requirements of relevant regulations and codes of practice.

Integral with, and as part of, their general managerial responsibilities, is the responsibility to set and monitor safety standards, raise and control safety performance, influence safety attitudes and awareness. To communicate safety by meetings, to report record and investigate

accidents and initiate corrective action, and to assess the training needs for all their subordinates and lead by example at all times.
The Directors shall ensure that before allocating any work to be undertaken, due consideration has been given to the risk of injury or loss involved. Also, to the necessary competence of the employees involved, as required by this Policy and Safety Management System. They must co-operate and assist the Senior Management in securing compliance with this Policy and Safety Management System.
The Directors ensure monitoring systems are in place.

4.2.3 Contracts Manager

At Contracts Manager level, there is accountability to Directors to ensure, by direct supervision, that all aspects of safe working are practised at all times. Their supervisory responsibilities include the practical implementation of safety standards, control of material and work quality; monitoring and correcting work systems.

The Contracts Manager shall ensure that before allocating any work to be undertaken that due consideration has been given to; the risk of injury or loss involved. Also, to the necessary competence of the employees involved, as required by this Policy and Safety Management System. They must co-operate and assist the Senior Management in securing compliance with this Policy and Safety Management System and lead by example at all times.

4.2.4 Working Site Supervisors

At Working Site Supervisor level, there is accountability to the Contracts Manager to ensure, by direct supervision, that all aspects of safe working are practised at all times. Their responsibilities include the practical implementation of safety standards, control of material and work quality; monitoring and correcting work systems and setting a personal example and lead by example at all times.

4.2.5 General Duties of Employees and Sub-Contractors

All members of the Scaffolding workforce carry individual responsibilities and these are outlined in the Health and Safety at Work etc. Act 1974, as follows: -

- To take reasonable care of themselves and others who may be affected by their acts or omissions.
- To co-operate with the employer/Company so far as is necessary to enable the employer/Company to comply with its statutory duties.
- Not to intentionally or recklessly interfere with or misuse anything provided in the interest of health, safety or welfare.
- To refrain from “horseplay” and/or abuse of Company or clients facilities and property.
- To know and to obey safety rules.

- To report all accidents and incidents.
- To provide high quality workmanship.
- Authority to stop unsafe work.

The Company requires the full support and co-operation of all employees and Sub-Contractors to achieve effective accident prevention.

4.2.6 Independent Health & Safety Consultants

Uniti Scaffolding Ltd employs the services of Safety & Access Limited as independent health and safety consultants to provide professional assistance and guidance to support the line-management. They are appointed as competent advisors and help discharge the Company's duty under Regulation 7 of the Management of Health and Safety at Work Regulations 1999.

The Consultants main responsibilities are to: -

- Advise the Director for Safety and senior management of any new safety legislation or changes in existing legislation.
- Provide an interpretation of safety legislation so that the management fully understands the actions required in order complying with legislation.
- Assist with initial implementation of the changes in safety legislation.
- Suggest suitable training for all levels of employees/sub-contract operatives, posters, slides, films etc to provide awareness of accident prevention and hazards to health.
- Recommend to senior management ways to improve working conditions.
- Investigate notifiable accidents or dangerous occurrences and submit to the company a written confidential report.
- Carry out pre-arranged site audit visits.

4.3 Training & Competence

Uniti Scaffolding Ltd recognises its general duty to employees/sub-contract operatives under section 2(2) c of the Health and Safety at Work etc. Act 1974, to provide all necessary information, instruction, training and supervision. To this ends the company continuously assesses the competency level of all employees and where applicable sub-contractors.

Periodically, we will carry out an organisational training needs analysis (TNA) of all activities to establish minimum competency levels and identify any training requirements. Following a TNA, training programmes will be developed to fulfil those minimum competency levels. TNA is a form of risk assessment, although

the normal risk assessment process shall identify additional training requirements.

Training for competence at Uniti Scaffolding Ltd is divided into four main categories: -

1. **Induction training** for all new starters

2. **Skills training** for all Operatives (eg: CISRS training)

3. **Health and safety training** (e.g. IOSH Managing Safety or SMSTS for management, CISRS Scaffold Supervisor or SSSTS for Supervisors and CISRS CPD training for CISRS Scaffolders.

4. **Modular training** in the form of toolbox talks and task specific briefings (eg: RAMS's).

4.3.1 Training Records

Training records are maintained in the personnel files with copies of certification, CISRS Scaffolders cards, and all training certificates are also scanned into the Company computer system for ease of retrieval.

Training and skills matrix will be developed and maintained as a quick reference guide when allocating duties to individuals and as a means of monitoring validation periods, to ensure refreshers are undertaken.

4.3.2 Induction Training

Every new employee/subcontract operative will receive induction training, before commencing work, which includes health and safety, to ensure that they are not exposed to unfamiliar hazards. An induction training package will be maintained to ensure that all essential information is covered.

The induction is recognised as an opportunity to convey the management beliefs and company values for health and safety management and to help influence the attitudes of all new starters.

A record of induction will be kept, signed by the inductees as an acknowledgement that they have understood the content.

4.3.3 Modular Training (Tool Box Talks)

Modular training in the form of toolbox talks helps increase and maintains general levels of health and safety awareness.

Each Manager/Supervisor can establish his own frequency of toolbox talks, as necessary (e.g. weekly, fortnightly or monthly). However, every operative as a minimum must receive at least one toolbox talk per calendar month, covering a specific topic.

Additional general toolbox talks are a useful medium for general day to day communication of information such as sharing accident learning or introducing best practice.

A record of attendance must be kept, with the signature of each attendee.

4.4 Communication of Information

4.4.1 Essential Information & Feedback

The 'toolbox talk' medium can be used to help disseminate essential health and safety information throughout the organisation.

It is important to solicit information from the workforce and receive feedback on health and safety issues. A few moments should be taken at the end of each toolbox talk giving the opportunity to raise and discuss issues.

4.4.2 Notice Boards

A notice board(s) for posting health and safety information must be in common areas of the site/office accommodation and welfare facilities i.e. main office etc. This information shall include a copy of the statutory HSE Health and Safety Law poster.

4.4.3 Formal Communications

To ensure the effective communication of important information Uniti Scaffolding Ltd uses the following formal systems: -

- Work Instructions
- Memorandums & General Notices
- Guidance Notes
- Safety Bulletins

Safety Bulletins are a system for communicating up-to-date health and safety information. Important issues, such as accident / incident learning to be shared will be compiled and issued to all employees, as necessary.

Copies of such written information should also be posted on the notice boards.

Certain formal communications may require the recipient to sign and return an acknowledgement slip accepting that they have received, read and understood the communication e.g. method statements, risk assessments etc…

4.4.4 External Communication

Andy Bowler is the designated first point of contact for all health and safety enquiries from any external organisations (eg: clients, HSE etc*).*

Visitors, Contractors and delivery drivers will follow the health and safety induction procedures before access to premises or carrying out of any work on the premises.

4.5 Effective Supervision & Control

At Uniti Scaffolding Ltd we have established four general principles for effective supervision to help ensure control of our core operations, due to the mainly peripatetic nature of the work, and compliance with the established performance standards - for all elements of the business – not just health and safety.

The four general principles for effective Supervision are to: -

1. Ensure every job is surveyed and a suitable and sufficient **risk assessment** carried out (see section 5.3 Risk Assessment).

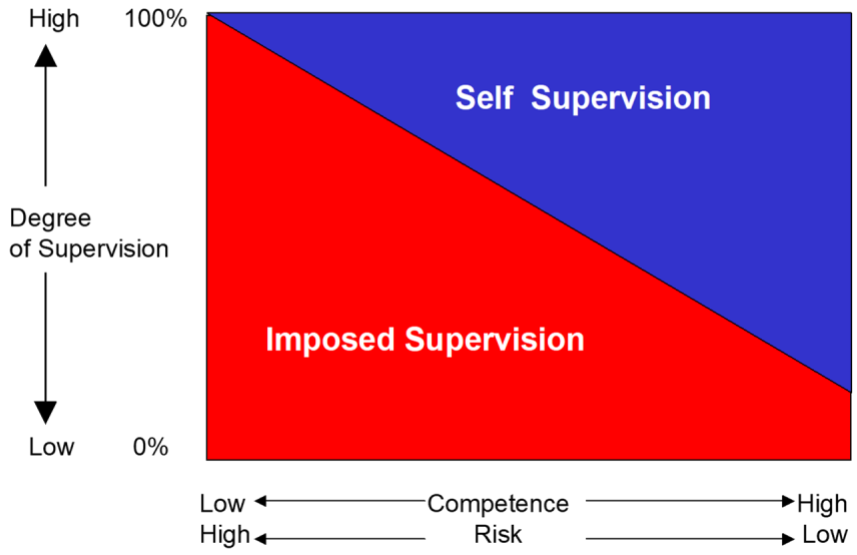
2. Ensure the correct **competence** levels of those allocated duties, in relation to the task(s) to be undertaken and the work equipment to be used.

3. Ensure the effective **communication** of the required performance standards and essential information. (eg: RAMS's)

4. Establish and implement the suitable levels of imposed and self-supervision depending upon the degree of risk and the competence levels of the operatives involved. Always ensure a minimum level of **imposed supervision**. This also includes the commissioning of work and handover by a competent person.

The following illustration is a guide to establishing the suitable levels of imposed supervision:

Levels of Supervision



HSE Publications HSG65: 2008 – 'Successful Health & Safety Management'

Remember that new starters and young or inexperienced or unqualified workers require a higher degree of supervision until their competence is proven.
A line-manager may delegate the performance of a supervisory duty to a subordinate, but they must ensure that they are deemed competent to undertake the particular task e.g. a Supervisor requesting a CISRS Advanced Scaffolder to commission a job and complete the handover certificate.

The Senior Management of Uniti Scaffolding Ltd will ensure that all line-management with supervisory responsibility for others receive the appropriate management training.

4.6 Consultation with Employees

Legislation requires employers to hold consultation with employees and to recognise the rights of employee and union safety representatives and safety committees. Uniti Scaffolding Ltd will comply with the relevant legislation as a minimum standard, this is done via feedback from Toolbox Talks.

4.7 Liaison with Fellow Employers

Uniti Scaffolding Ltd recognises its duty under the Management of Health and Safety at Work Regulations 1999, to communicate with fellow employers to ensure information about hazards and control measures is shared. This will enable suitable arrangements to be made, normally by pre-start meetings and daily site briefings with other site contractors at the start of the day.

4.8 Control & Co-ordination of Contractors (including self-employed)

Uniti Scaffolding Ltd use sub-contractors to provide scaffolding operatives to the Company, these operatives are covered by all the clauses of this policy and safety management system as far as health and safety is concerned.

Where these sub-contractors are engaged the control of Contractors activities must be strictly covered by the terms of their contract.

A vetting process for health and safety will be carried out for the assessment of Contractors to make reasonable enquiries of the competence and performance standards prior to their appointment.

All contractors and sub-contractors will be subject to the Company's monitoring arrangements, to ensure compliance with the relevant policies, procedures etc.

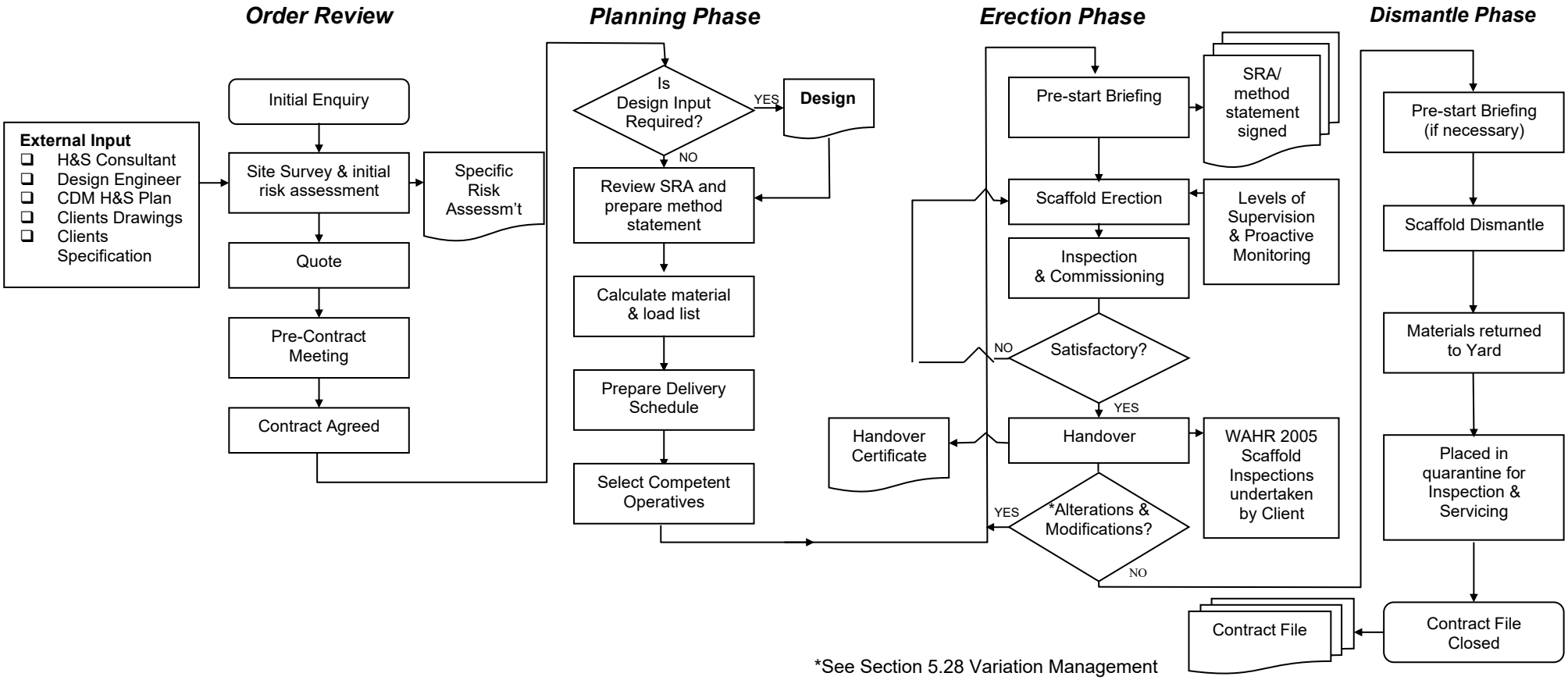
5. *Planning & Implementation*

Establishing performance standards to be measured against:

The cornerstones of safety management are the identification of hazards, the assessment of risk, eliminating the risk or establishing and enforcing reasonably practicable control measures to minimise the risk. This includes normal, non-routine and emergency scenarios.

5.1 Overview of Main Flow Process (Management Programme)

The purpose of this flowchart is to solely illustrate the main flow process of the main contract scaffolding operation for the benefit of the Safety Management System. Please note that it is not comprehensive (I.e. variation requests, valuations, payment schedules etc



*See Section 5.28 Variation Management

5.2 Performance Standards

This document details the performance standards for health, safety and welfare that must be adhered to. However a number of these arrangements will be expanded upon in other documents such as: -

- Operating Procedures & Work Instructions
- Relevant Health and Safety Regulations (See Appendix A)
  NASC/HSE Guidance Notes eg: NASC Safety and Technical guidance notes SG4:22, TG20:21 (Tube and Fitting Scaffolding), System Scaffold Manufacturers guides and TG30:24 (System Scaffolding-Common types in conjunction with manufacturers guides, Current version supports generic Rossette system with additional systems to be added during 2025).
- Handbooks
- Memorandums & Notices
- Etc…

Section 6 identifies the specific performance standards that are used to measure health and safety performance. These measures are known as key performance indicators or KPI's. The KPI's are reviewed at the formal safety meetings outlined in section 7. The Senior Management establishes targets for improvement or objectives to be achieved by the organisation or individual employees at the start of each new calendar year.

5.3 Risk Assessment

The identification of hazards, assessment of risk, and establishing and enforcing of control measures to eliminate or control risk, are the cornerstones of effective safety management, these are reviewed after changes or incidents.

The Management of Health and Safety at Work Regulations 1999, Regulation 3, requires employers to make suitable and sufficient assessment of the risks to health and safety and to keep records of the significant findings. The Company has developed risk assessment processes to comply with this statutory requirement.

The two risk assessment processes used are known as **Generic Risk Assessment** and **Specific Risk Assessment**. Both processes use a qualitative technique, which relies upon the judgement of a competent person (or Risk Assessor). The Risk Assessor must be appointed by Management having been deemed competent and received training in the particular techniques used.

Certain other pieces of legislation require specific risk assessment such as COSHH and the Manual Handling Operations Regulations1992, of which arrangements are made within further sections of this policy.

5.3.1 Generic Risk Assessment

Generic Risk Assessments will be prepared and implemented for all of the routine operations undertaken by Uniti Scaffolding Ltd. However they do not take account of the specific environmental conditions at the particular workplace, which is why they must always be supplemented by a specific risk assessment.

The contents of the Generic Risk Assessments to be regularly communicated to all employees/sub-contract operatives via recorded and signed for toolbox talks.

This flowchart illustrates the key steps taken in the Generic Risk Assessment process: -

Generic Risk Assessment Process

Define the Activities

Identify all routine activities undertaken
E.g. Erect/Dismantle a tied independent scaffold.

Hazard Identification & evaluation

Identify all of the foreseeable hazards from each activity and who may be at risk.

Assess the Risks Arising from each hazard identified

Risk Formula: Severity X Likelihood = Risk

Risk Matrix

Likelihood \ *Severity*		Minor Injury	Lost Time Injury	Fatal/ Major Injury
		Low	**Medium**	**High**
Seldom Occurs	**Low**	L	M	M
Frequently Occurs	**Medium**	M	M	H
Near Certain to Occur	**High**	M	H	H

Establish preventative & protective control measures

The risk must be eliminated or minimised to a tolerable level or as low as is reasonably practicable. The MHSW'99 specifies a hierarchy of controls that must be followed.

Plan & Implement control measures

Line-management ensure the controls are maintained through effective supervision and formal proactive monitoring

Review adequacy of control measures

Periodically, at least every 2 years
If conditions or circumstances significantly change
If failures are identified through auditing, accident investigation etc…

The Generic Risk Assessment must be recorded on the Generic Risk Assessment form.

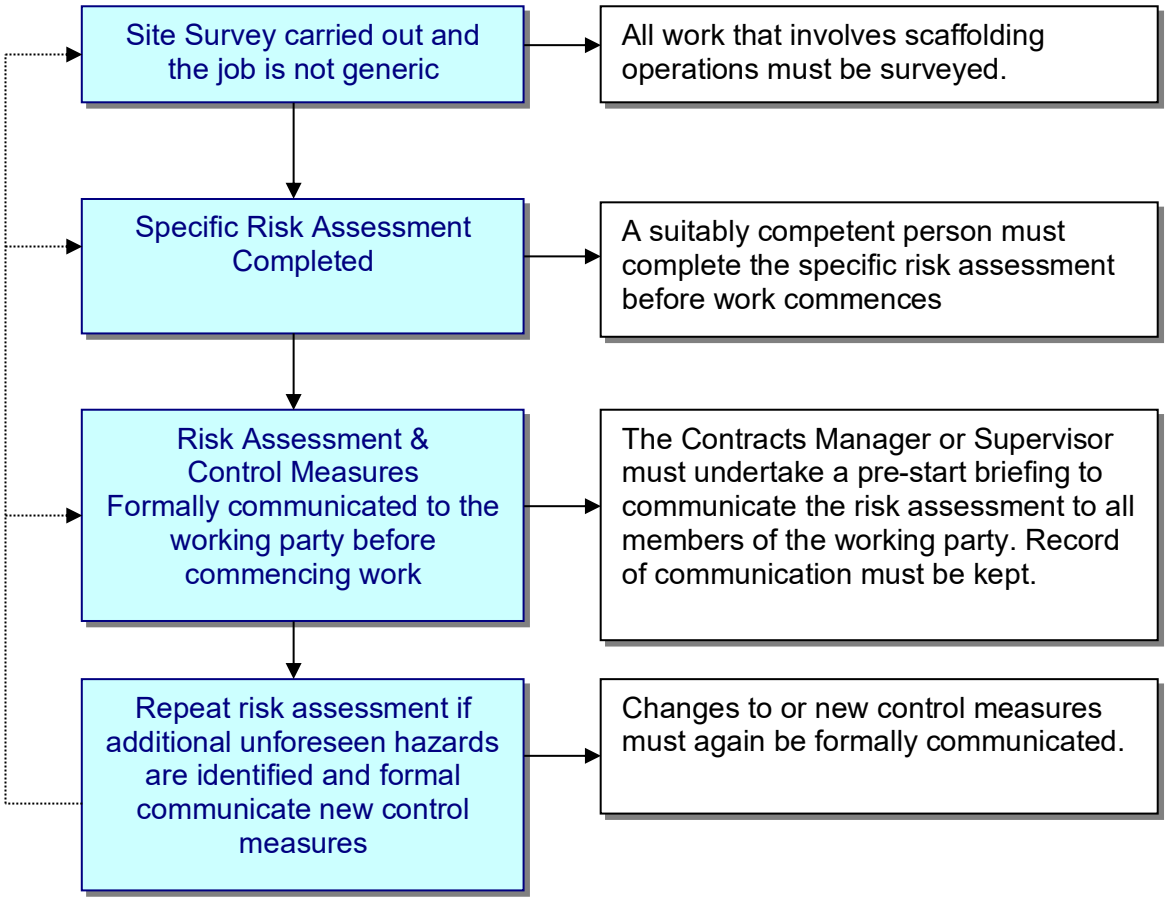
5.3.2 Specific Risk Assessment

When the job is not generic, a specific risk assessment must be carried before each job commences. The assessment process is similar to the Generic; however it is expanded to include any site/job specific risks (eg: job close to School, electricity cables running across site, very busy and tight City centre site, etc).

The specific risk assessment must be formally communicated to and signed by all employees involved in the operation before commencing.

This flowchart illustrates the basic principles required for the Specific Risk Assessment process: -

Specific Risk Assessment Process



5.3.3 Dynamic Risk Assessment

Uniti Scaffolding Ltd recognise that circumstances do change and if Scaffolding Operatives arrive at a job to find that the Risk assessment and/or method statement can't be followed (eg: other Contractors

working), then they must contact their Supervisor or Manager to arrange a Dynamic Risk Assessment that takes into account the new circumstances before work can commence.

5.4 Method Statements and Scaffolding Plans

It is a requirement of the Work at Height Regulations 2005 (Schedule 3 part 2) that a scaffolding plan is needed prior to the erection, use or dismantling of Scaffolding. This statutory requirement is undertaken by Uniti Scaffolding Ltd by the production of method statements.

It is noted that much of the work undertaken is of a standard nature and as such generic method statements are produced for this regular work and are part of the Companies standard operating procedures; however it is required that each site or scaffold should have a site specific method statement, that takes into account the findings of the specific risk assessment and includes rescue procedures.

Method Statements are prepared by a competent person and formally communicated to the Operatives by way of a method statement briefing which the operatives sign, date and record time to confirm that they have understood the briefing and agree to work in accordance with the method statement.

The standard Company method statement format should be used.
All method statements should include the following:

- The clients details
- Details of the location
- Full description of the activities to be undertaken
- Specific equipment to be used
- TG20:21“compliance sheet” (TG30:24 compliance sheet if applicable) and/or Scaffold Design Drawing.
- Sequence of events or work method
- Significant hazards identified through the risk assessment
- Specific control measures to be adopted
- Details of rescue plan to be adopted

5.5 Working at Height (Policy 4)

Working at Height and Fall Prevention
5.1 General Principles

Uniti Scaffolding Ltd recognises that working at height is a high-risk activity and will take all reasonably practicable measures to prevent falls and associated injuries.

All work at height shall be:

properly planned and organised
carried out by competent persons
appropriately supervised
undertaken using suitable equipment and control measures

Work at height includes any place where a person could fall a distance liable to cause personal injury, including work above or below ground level (such as near excavations).

All work at height activities shall be carried out in accordance with site-specific Risk Assessments and Method Statements (RAMS), which will define the control measures required.

5.2 Hierarchy of Control

Uniti Scaffolding Ltd will apply the hierarchy of control in accordance with the Work at Height Regulations 2005:

Avoid working at height where reasonably practicable
Prevent falls by using collective protection measures, such as:
fully boarded working platforms
guardrails and toe boards
advanced guardrail systems
Mitigate the consequences of a fall by using personal fall protection equipment where collective protection is not reasonably practicable

Collective protection measures will always be prioritised over personal protection.

5.3 Scaffold Design and Compliance

All scaffolds shall be designed, erected, altered and dismantled in accordance with:

the Work at Height Regulations 2005
relevant NASC guidance, including SG4:22, TG20:21 and TG30:24 (where applicable)
system scaffold manufacturer's instructions

Where scaffolds fall outside standard configurations, they shall be subject to specific design, including strength and stability calculations.

All scaffolds must be erected safely, be fit for purpose and be properly inspected and handed over prior to use.

5.4 Fall Prevention Measures

Uniti Scaffolding Ltd prioritises fall prevention through the use of collective protection systems in accordance with NASC SG4:22 "Preventing Falls in Scaffolding Operations".

Scaffolding operations will utilise established safe systems of work, including:

advanced guardrail systems
the "Scaffstep" or short lift method
progressive installation of collective protection

Additional control measures may be specified within RAMS depending on site conditions, complexity and risk.

5.5 Personal Fall Protection Equipment

Where collective protection measures are not reasonably practicable, or as part of an established safe system of work, suitable personal fall protection equipment shall be used.

All scaffolding operatives shall be equipped with appropriate fall protection equipment before commencing work at height.

As a minimum, this shall include:

full body harness with rear dorsal attachment point to BS EN 361
fixed length lanyard (1.75m – 2.0m) with energy absorber to BS EN 355
scaffold hook / connector with 55mm opening to BS EN 362

Subcontract operatives are required to provide their own equipment, which must meet these standards and be approved for use by a Supervisor or Contracts Manager.

5.6 Inspection and Maintenance of Equipment

All fall protection equipment, including harnesses, lanyards and Scaffstep systems, shall be subject to:

pre-use and post-use checks by the user
formal inspection at intervals not exceeding 3 months
additional inspections where equipment is exposed to harsh conditions

Inspections shall be carried out by a competent person and recorded in accordance with manufacturer recommendations, HSE guidance (INDG367) and NASC guidance SG4:22 and SG16:23.

Records of all inspections shall be maintained.

5.7 Training and Competence

All scaffolding operatives involved in the erection, alteration and dismantling of scaffolding shall receive appropriate training in fall prevention and protection measures in accordance with NASC SG4:22.

Each operative shall be issued with, and be familiar with, the SG4 pocket guide.

Supervisors and managers shall receive appropriate training and are responsible for:

ensuring operatives understand safe systems of work
monitoring compliance with SG4 and company procedures
enforcing standards where necessary
5.8 Supervision and Monitoring

Supervisors and Contracts Managers shall ensure that:

work at height is carried out in accordance with RAMS
appropriate control measures are in place and used correctly
operatives are competent and properly equipped
unsafe practices are identified and corrected

Monitoring shall include both formal and informal inspections.

5.9 Uniti Gold Standard – Working at Height

Safe working at height is fundamental to the Uniti Gold Standard.

Preparation ensures that work is properly planned and risks are identified before work begins
Discipline ensures that procedures, controls and safe systems of work are followed at all times
Communication ensures hazards, changes and issues are identified and addressed early
Teamwork ensures operatives support each other in maintaining safe working practices

By applying these principles, Uniti Scaffolding Ltd ensures that work at height is carried out safely, consistently and to the highest professional standard.

5.7 Work Equipment

In order to comply with the Provision and Use of Work Equipment Regulations 1998 all work equipment (including hand tools, appliances, lift trucks, computers scaffolding materials etc.) must be designed and suitable for the purpose for which it is to be used and only use for operations for which it is designed.
The use of work equipment is restricted to those persons appointed to do so and must only be repaired and maintained by nominated competent persons. A service log recording all repairs and maintenance must be kept for all plant equipment and vehicles.

Line-management must ensure that all employees receive all necessary information, instruction and training in the use of work equipment, including where appropriate written instructions.

Any work equipment found to be defective must be reported to the immediate Supervisor who will arrange for the equipment to taken out of use and clearly marked as defective.

Inspection records are maintained.

5.7.1 Scaffolding Materials

All scaffolding components and associated materials such as ladders etc. must be subject to a material control procedure, which ensures so far as is reasonably practicable the inspection and where appropriate the testing of all materials periodically. A competent person who carries out the inspections must ensure the segregation of defect material for destruction or repair, to prevent use.

The appointed person must be deemed competent by his manager having received appropriate training and instruction.

All operatives when handling scaffolding materials must not use defective materials. Any defective materials must be segregated and returned to the yard for quarantine.

All scaffolding materials must be handled in a controlled manner (e.g. hand to hand) and NEVER thrown or allowed to drop – Any employee/sub-contract operative found "BOMBING" material will be referred for disciplinary action, or in the case of a sub-contract operative cessation of contract.

5.7.1.1 System Scaffolding

The Company use do not at present use system scaffolding; however in the future the Company plans to use system scaffolding staircases and loading towers, this system scaffolding must come under the controls as set out in 5.7.1 above to ensure the quality and suitability for use of all of the components.

In addition, at least one operative in any gang of Scaffolders erecting the system scaffolding staircase and/or loading bay must have received instruction and training covering the manufacturer's requirements and system specifications.

5.7.2 Mobile Plant & Vehicles

All mobile plant and commercial vehicles must be subject to regular maintenance and servicing in accordance with the manufacturer's instructions and statutory provisions e.g. Lifting Operations and Lifting Equipment Regulations 1998. In addition all mobile plant and commercial vehicles must be subject to weekly formal inspections by the operator.

Any defects identified must be reported to the Managing Director and the findings and remedial action recorded in the report.

All mobile plant with a risk of rolling over must be fitted with an appropriate rollover protection system (ROPS) and seatbelt(s).

5.7.2.1 Lift Trucks

The Company does not own or hire a Forklift at present; however, if they do so in the future then detailed arrangements will be developed to cover Forklift Truck operations.

Only appointed Lift Truck Operators, who have received training from an approved body and are deemed competent, as detailed in the Health and Safety Executives Approved Code of Practice COP L117 Rider Operated Lift Trucks; Operator Training, are permitted to drive fork lift trucks.

All forklift truck operations to be carried out in accordance with HS (G) 6 Lift Trucks: Safety in Working. Detail to be added HERE if Forklifts are used.

5.7.2.2 Mobile Elevating Work Platforms

Mobile Elevating Work Platform operators must hold a current IPAF operators certificate/card or equivalent.

Fall restraint (ie: Full body harness and fixed length lanyard) equipment must be provided and used as per training requirements

In some cases fall arrest equipment may not be a requirement while using a scissor lift. This must be reflected in the risk assessment as to justify not wearing fall protection equipment.

5.7.3 Electrical Equipment

It is Company policy to use 110v or low voltage battery operated hand tools wherever possible. Where 240v hand tools are to be used they must be used in conjunction with a residual current device (RCD).

All site portable electrical equipment must be inspected and portable appliance tested (PAT) every 3 months, by a competent engineer. All RCD's must be tested every 6 months. An inventory of all equipment must be maintained and all new equipment is added to the list. Each piece of equipment must be clearly marked with the date of the test and the date of re-testing.

The electrical installations to all company buildings will be tested at least every 5 years, by a competent engineer.

5.7.4 Machinery Guarding

All dangerous moving parts creating a danger zone must be assessed and the Company must establish and enforce all reasonably practicable control measures by following the hierarchy of control measures defined in Regulation 11 of the Provision and Use of Work Equipment Regulations 1998.

5.7.5 Lifting Operations & Lifting Equipment

A person(s) shall be appointed, who has received appropriate training to be deemed competent, to plan and supervise lifting operations, as necessary to ensure they are carried out in a safe manner.

To ensure Lifting equipment (e.g. cranes, lorry-loaders, hoists etc.) and lifting accessories (e.g. chains, slings, shackles gin wheels and ropes etc.) is maintained in good order the Company shall nominate a person (and deputy) to be responsible for the storage, maintenance and inspection of all lifting equipment and accessories owned and controlled by Uniti Scaffolding Ltd, as required by the Lifting Operations & Lifting Equipment Regulations 1998 (LOLER'98).

All lifting equipment shall be inspected and thoroughly examined, as required by Regulation 9 of LOLER'98. Copies of all inspection reports and certificates shall be kept on site and made available for examination when required.

A Slinger / Signaller (Banksman) shall be appointed to assist the crane operator if his vision of the load throughout its travel is obstructed. All

appointed Slinger / Signallers must be competent, having received formal training to ConstructionSkills standard or equivalent.

The Slinger / Signaller must visually inspect all lifting equipment before each use. Any defects identified must be reported to the immediate Supervisor, with the equipment removed from use and clearly marked as defective.

All lifting equipment must have the Safe Working Load (SWL) clearly marked on it, with the required Safe Working Load established before use.

Suitable storage accommodation must be provided to prevent physical damage or deterioration.

5.8 Occupational Health – Not sure about the title here, if keep add in in Well-being linked Policy (21) and then mention a proactive management approach.

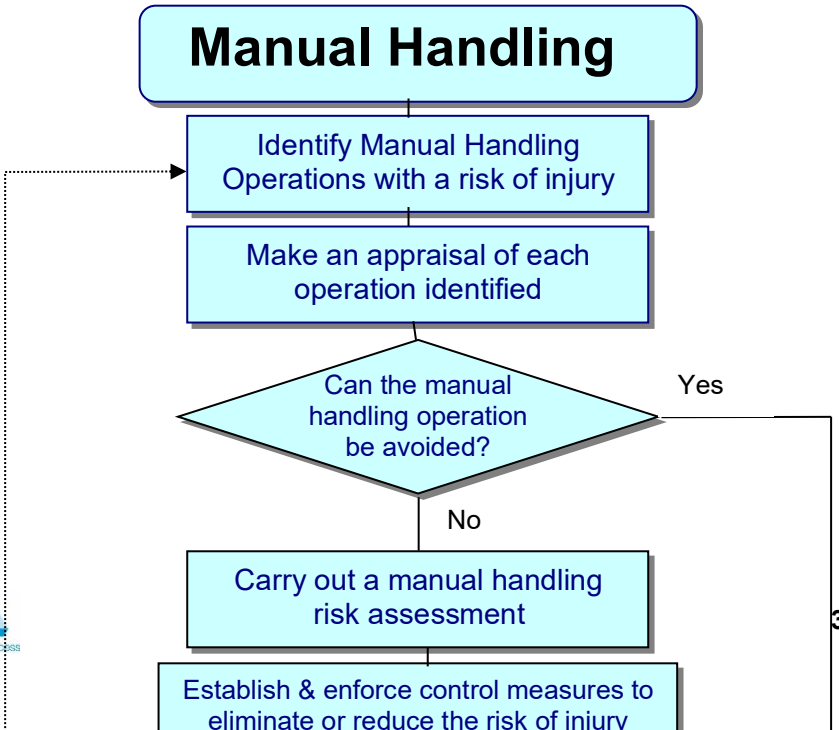
5.8.1 Manual Handling (Policy 12)

The Manual Handling Operations Regulations 1992 requires employers to avoid manual handling operations and where they cannot be avoided to make an assessment of the risk of injury to establish control measures to reduce those risks as low as reasonably practicable.

Uniti Scaffolding Ltd recognises that manual handling is inherent part of the scaffolder's trade and that the special handling techniques used in scaffolding are essential enabling skills. These skills are taught as part of the current Construction Industry Scaffolders Record Scheme (CISRS).

NASC SG6 Management of Manual handling in the scaffolding industry gives scaffolding specific advice which is supported with information provided from the NASC SG6 Manual Handling suite of guidance notes. A SG6 manual handling video can be viewed via the NASC eportal.

The flow chart below outlines the steps taken to comply with the requirements of the Manual Handling Operations Regulations 1992: -



5.8.2 Hazardous Substances

Arrangements are being developed to assess the effects of any substances identified as hazardous to health and the adoption of relevant control measures, as required by the Control of Substances Hazardous to Health Regulations 2002 as amended (COSHH).
All suppliers of materials are required to provide all relevant health and safety information about their products to form the basis of the COSHH risk assessment.

This information is to be requested for each product before procurement stage, so that consideration can be made for the use, handling and storage of that substance as per COSHH.

The COSHH assessment must be carried out by an appointed competent person; this could be the Safety Consultant.

5.8.3 Asbestos

Uniti Scaffolding Ltd does not currently undertake scaffolding operations for the work with asbestos (e.g. scaffolding within a live asbestos enclosure.) Uniti Scaffolding Ltd is aware that such work would require further training of Scaffolders, development of specific asbestos risk assessment, method statements and work procedures and may need a license under the Asbestos Licensing Regulations.

If necessary, arrangements will be developed to enable the Company to work in this area and apply for an ancillary license in order to undertake such work.

If the Company are asked to work on a building that was built before 2000 it will, before starting work on the site provide basic asbestos awareness training to all site Operatives and Managers who attend site or manage or supervise other who do attend site. The purpose of the training is to increase awareness so that materials containing asbestos can be identified, to reduce the risk of accidental exposure and establish suitable contingency measures should asbestos materials be accidentally disturbed. (*As the Company currently work exclusively on*

new build housing sites with no asbestos risk this training is not required)

5.8.4 Noise

The Noise at Work Regulations 2005 requires a risk assessment to be made, to ascertain the noise levels employees are exposed to, establishing and implementing precautions to avoid or protect against excessive noise levels.

Uniti Scaffolding Ltd aims to comply with the requirements of the Noise at Work Regulations 2005. The Noise Regulations require specific action to be taken at certain action values.

These relate to:

- The levels of exposure to noise of employees averaged over a working day or week; and
- The maximum noise (peak sound pressure) to which employees are exposed in a working day.

The values are:

Lower exposure action values:

- daily or weekly exposure of 80 dB;
- peak sound pressure of 135 dB;

At these levels the Company will provide information and training and make hearing protection available.

Upper exposure action values:

- daily or weekly exposure of 85 dB;
- peak sound pressure of 137 Db.

At these levels the Company is required to provide hearing protection if the noise cannot be controlled by engineering measures.

As part of the assessment, a competent person using specialist equipment that could be the Safety Consultant must measure noise exposure. The noise exposure is calculated over an equivalent eight-hour shift known as the Lep'd.

Engineering solutions must be considered as the first line of control. When the adoption of reasonable engineering or management control fails to reduce the exposure to an acceptable level, only then will resource be made to the use of Personal Protective Equipment.

All noise assessments will be reviewed periodically and if the process changes (i.e. new plant and equipment). Noise exposure shall be considered during the selection of new plant and equipment.

5.8.5 Vibration

The Control of Vibration at Work Regulations 2005 introduces controls in order to reduce prolonged and regular exposure to high levels of vibration known as Hand/Arm Vibration Syndrome or “HAVS”. HAVS is caused in the main by prolonged and regular use of vibrating power tools such as angle grinders, saws and hammer drills.

The Company undertakes assessments of all vibrating tools that it uses and has produced a procedure that indicates the maximum recommended time periods that each tool can be used for.

The Company has a purchasing policy that as far as possible ensures that vibration levels are keep to a minimum and that information is given to users by the way of toolbox talks.

5.8.6 Health Surveillance & Screening

Exposure to certain substances requires regular health surveillance to be carried out, to identify any hazardous effects. Health surveillance will be undertaken where identified in the COSHH risk assessment. In addition certain pieces of legislation also require health surveillance i.e. the Control of Asbestos at Work Regulations and the Control of Lead at Work Regulations.

All new employees/sub-contract operatives are to complete a pre-employment medical questionnaire, which is contained in the application form.

The recruiting manager will vet the medical questionnaire. Any medical conditions identified should be referred to the Safety Consultant for advice.
Driver/Plant Operator medical checks will be carried out as recommended by the Ministry of Transport for Large Goods Vehicle drivers.

5.8.7 Stress

Stress can become a significant problem for individuals and can be a contributory factor to ill health such as heart disease or to accidents by reducing concentration. Individuals are affected by stress in different ways and many sources of stress are not related to work. However, the following guidelines should be applied

- Directors and Managers must monitor workloads of employees/sub-contract operatives to ensure that loadings do not exceed reasonable levels

- Employees/sub-contract operatives facing difficulties outside work, which may affect their ability to deal with their work effectively, should discuss their working arrangements with the Supervisor or Contracts Manager, giving as much notice as possible

5.8.8 Leptospirosis (Weil's disease)

Weil's disease is a type of leptospirosis that is a serious and sometimes fatal infection that that is transmitted to humans by contact with urine from infected rats.

It can start with a flu-like illness with severe headache which can lead to vomiting, muscle pains, jaundice, meningitis and kidney failure; early treatment is essential.

Workers (including Scaffolders) who work on sites near canals, rivers, ponds, sewers, ditches, contaminated water or other areas frequented by rats are at risk. The bacteria can get into your body through cuts and scratches, through the lining of your mouth, throat and eyes after contact with infected rat urine.

To protect yourself:

- Keeps areas free from food rubbish so as not to attract rats
- Do not touch a rat (dead or alive) with unprotected hands
- Wash cuts and grazes immediately with soap and water and cover all broken skin with waterproof plasters before and during work
- Wear protective clothing (eg: gloves)
- Wash your hands after handling any animal, contaminated clothing or other materials
- ALWAYS wash your hands before eating, drinking or smoking

5.8.9 Coronavirus: Covid-19

The company is aware that Coronavirus: Covid-19 still remains a public health issue and will endeavour conduct their operations in line with current public health advice.

https://www.gov.uk/coronavirus

Employees who have Coronavirus: Covid-19 or symptoms of Covid-19 should try to stay at home and avoid contact with others where possible.

Employees should contact the office/line manager if they have Covid-19 or symptoms and /or a positive Covid-19 test result. The employee will be advised what action should be taken in line with current public health advice.

5.9 Overhead Power lines & Underground Services

Overhead electric power lines present a significant risk of death and/or major injury when scaffolding or handling metallic scaffolding materials in close proximity to the cables. Also, underground services need to be considered when using screw ground anchors or stacks to secure guy wires.

All work under or adjacent to overhead power lines must be subject to risk assessment with a specific method statement prepared, including considering exclusion zones being enforced. As a minimum this work must be undertaken in accordance with the HSE guidance note GS6 Avoidance of danger from overhead electric power lines.

Additional advice can be obtained from NASC Guidance Note SG5:18 Overhead Power Sources and Earthing of Scaffold Structures.

5.10 Scaffold Inspection, Commissioning & Handover

Complete or partially completed scaffold structures must be inspected and commissioned by a nominated competent person (usually the Contracts Manager, Supervisor or other nominated competent person), to ensure that it has been erected to the required standards and is safe to use, prior to handover.

If the structure is a designed scaffold then the inspection must ensure that the structure has been erected as per the drawings, without significant deviation.

The handover certificate shall be used to formally handover the structure or part structure and should be signed by the client's representative. If this is not possible then it should be e-mailed, faxed or posted registered mail with the transmittal sheet or receipt retained on the contract file. The records of the inspections are maintained.

Where Uniti Scaffolding Ltd is contractually required to undertake statutory inspections of a scaffold structure or part thereof, in pursuit of Regulation 12 & 13 and Schedule 7 of the Work at Height Regulations 2005 on behalf of a client, then such inspections shall include and be limited to the following:

a) Before being taken into use for the first time; and

b) After any substantial addition, dismantling or other alteration; and

c) At regular intervals not exceeding 7 days since the last inspection.

However in addition to a), b) and c) above, should a client require Uniti Scaffolding Ltd to inspect a scaffold structure or part thereof after any event likely to have affected its strength or stability, then the client shall give reasonable notice to Uniti Scaffolding Ltd. Such an inspection would be considered extra and a variation to the contract requiring a specific written instruction.

5.11 Masonry Anchor Testing

The testing of masonry anchors used as scaffold ties is an essential element of the scaffold commissioning and handover process. The manufacturer instructions must be followed for the specific type and make of anchor used.

Anchor testing must be carried out in accordance with the NASC Technical Guidance TG4:19 "Anchorage systems for scaffolding".

Preliminary testing may need to be carried to determine the suitability of the base materials and proof testing of the installed anchors to ensure their security.

The frequency of proof testing must be carried out in accordance with the following table: -

No. of Ties per Structure	*No. of Pullout Tests required*
Up to 20	Minimum of 3
More than 20	1 in 20 (5%), 10% in Brickwork

The results of the pullout testing should be recorded on the handover certificate (No. of ties tested and results in failures or KN's), unless a specific report is prepared.

Anchors must be tested to a load of 1.25 times the working load eg:
Working load of 3.5Kn means a test load of 4.4kN
Working load of 6.1kN means a test load of 7.6Kn
Working load of 12.2kN test load of 15.3kN
Pass criterion is that no significant movement of the anchor is apparent, visual check only is sufficient.

If an anchor fails a test, then an investigation of the cause is required and an increase in testing rate as follows:
One failure – Double the test rate to 1 in 10 with a minimum of 6
Two failures – Double again to 1 in 5 with a minimum of 12
More than 2 failures – test 100% of ties, and review specification of tie and/or installation method.

Please note that "drop-in" expanding socket anchors (eg: Hilti HKD) can't be used in Brickwork.

5.12 Protection of the Public and Others

All reasonably practicable measures must be taken to secure the workplace to prevent the public and others (such as fellow workers, visitors, trespassers etc.), especially children being at risk of an injury. These are usually created by barriers with signage.

Each location must be assessed considering the nature of the work and the location of the workplace and its environment, to establish the necessary control measures.

5.13 Personal Protective Equipment (PPE) (ref to Workwear and PPE Policy 2)

All Personal Protective Equipment (PPE) purchased must meet the necessary European Standards and carry the CE Mark.

The risk assessment process together with our client arrangements (i.e. Site Rules, Permit-To-Work Systems etc…) should identify a requirement for PPE. PPE will only be specified as a last resort in the hierarchy of controls.

An assessment of the PPE must be carried out as required by the Personal Protective Equipment Regulations 1992 and the Personal Protective Equipment at Work (Amendment) Regulations 2022, to ensure the correct selection and suitability for the user.

Under the new 2022 amendment employees/workers have a statutory duty to use PPE provided as part of a safe system of work and not misuse or interfere with it.

All new employees/workers receive a full issue of PPE when they commence employment. If any item of PPE required is not available, expired, damaged or defective then it shall be replaced upon request. A record of all PPE issued must be maintained, signed for by the recipient.

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No charge can be made to employees/workers for the issue of PPE

Subcontract scaffolding operatives are issued with a safety helmet and Hi-Viz with the Company logo displayed. All other PPE requirement whether required by the Company or our client's site procedures are to be supplied by the subcontract operatives at their own cost. In some situation's the company may provide PPE directly to sub contact labour. This should be formally agreed between the two parties prior to work starting.

5.14 Scaffold Design

All scaffolding will be provided in compliance with the relevant British and European Standards including NASC TG20:21 Tube and Fitting scaffolding, System Manufacturers guides and TG30:24 System Scaffolding for applicable System scaffolding in conjunction with manufacturers guides, the Work at Height Regulations 2005 and the Construction (Design and Management) Regulations 2015.

Any scaffold structure requiring design input e.g. Scaffolds that do not comply with a TG20:21 Compliance sheet, and/or System scaffolding outside the scope of manufacturers guides or a TG30:24 Compliance sheet (for applicable system scaffolding covered under current guidance) will be subject to a design risk assessment. Calculations will be made by a suitably competent Design Engineer and drawings produced. Any significant hazards or hazardous work sequences that cannot be designed out shall be detailed on the drawing in text, also where appropriate within the specific method statement.

Some clients have a detailed Scaffolding Specification that includes site specific scaffold designs for various structures, it is vital that the Working Site Supervisors have copies of such specifications and scaffold designs and communicate such information to the CISRS Scaffolders under their control. It is the Working Site Supervisors explicit responsibility to ensure that scaffolds are erected in line with these client requirements.

Anticipated significant deviations from the original design criteria, revealed during the execution of the work needs to be communicated to the Design Engineer to ensure structural integrity is maintained.

An aide memoir checklist has been prepared as a guide to all Directors, Managers and Supervisors to help identify when Design input is required. This

document is known as the Design Matrix, please see appendix B. The design if verified by a competent person.

5.15 **First Aid & Emergency Arrangements (Policies that link are Communication & Reporting Policy (Includes High risk reporting) 9 & Emergency and Rescue 10)**

An assessment will be made of the risk of serious and imminent danger at the workplace, and Uniti Scaffolding Ltd will ensure that control measures for dealing with emergencies are established. They will also comply with any drills conducted.

The arrangements at each workplace include: -

- Premises fire risk assessment
- Raising the alarm and communicating with the emergency services.
- First aid.
- Firefighting capabilities.
- Emergency Evacuation.
- Assembly.
- Appointed persons, training, drills and exercises.

First aid equipment and trained personnel to administer first aid will be provided and maintained in accordance with the Health and Safety (First Aid) Regulations 1981, Approved Code of Practice and Guidance L74, (as amended in December 2013) as a minimum standard.

Uniti Scaffolding Ltd intends to comply with the site-specific arrangements made by our clients. However, in such circumstances where the Client makes total arrangements for first aid, the Company will ensure that employees have basic knowledge to administer immediate aid.

5.16 **Welfare Facilities**

Welfare facilities will be provided in compliance with the Workplace (Health, Safety & Welfare) Regulations 1992, the Construction (Design and Management) Regulations 2015 and their relevant Approved Codes of Practice and Guidance and NASC SG18:14 “Welfare facilities for the Scaffolding Contractor” as a minimum standard.

An employee/sub-contract operative found to be defacing or misusing the Welfare Facilities will face disciplinary action or cessation of contract.

5.17 **Housekeeping**

Housekeeping is an essential feature of accident prevention e.g. trip hazards, fire hazards etc.

The subject of housekeeping must be integrated into all monitoring and auditing arrangements to ensure high standards of housekeeping are maintained (for example keeping working platforms clear of surplus scaffolding materials).

5.18 **Smoking at Work**

The Smoke Free Premises etc Regulations 2006 was introduced to save lives and prevent diseases caused by second-hand smoke.

The effect of the law is that at Uniti Scaffolding Ltd Staff, Clients and Visitors will not be able to smoke in the business premises if they are 'enclosed' or 'substantially enclosed', this includes previously designated smoke areas.

A No Smoking Sign will be placed in a prominent position at or near each entrance so that people entering can see it, and it must include the statement ''It is against the Law to smoke on these premises''
The Smoke free legislation also covers ALL Vehicles which are used to transport clients, visitors or which are used by more than one employee in the carrying out of work duties even if this use is only intermittently.
The Company are required by Law to display a No Smoking sign in all company vehicles covered by the legislation (enclosed vehicles used to transport the Public or used by more than one employee/sub-contract operative for carrying out work duties).

5.19 Substance Abuse at Work (ref to Drug and Alcohol Policy 11)

Substance (including alcohol and/or drugs or other substance) abusers can adversely affect the safety of themselves and fellow workers whilst at work. Therefore if any employee or contractor is known to be, or strongly suspected of being effected by substance abuse they are to be referred to their immediate supervisor who must arrange for their removal from the workplace.

Employees/sub-contract operatives are not permitted to bring prohibited substances onto company premises or to work.

Any employee/sub-contract operative who is required to take prescription substances that may affect their performance at work must inform their immediate Supervisor. Alternative duties may be allocated to these employees/sub-contract operatives and they must be prohibited from driving/operating plant equipment and working at height.

5.20 Young Persons at Work

A young person at work is a person under the age of eighteen (18) and can be an employee, visitor or student on work experience.

Before a young person starts work e.g. trainee, apprentice etc. a suitable and sufficient risk assessment must be carried out on all their activities. Any residual risk that remains that cannot be eliminated and has been controlled so far as is reasonably practicable must be communicated to the young person (and in the case of a young person under 16 also their parents/guardian and written consent obtained).

Special supervision arrangements must be made for young persons at work and the Company will ensure that they will always work under the direct and immediate supervision of a Scaffolder or Advanced Scaffolder (in the case of a Trainee Scaffolder) who has been formally nominated as the Trainees mentor.

5.21 Lone Working

A lone worker is anyone who works alone without close or direct supervision, this includes employees and sub-contractors. In certain situations employees/sub-contractors may be required to carry out Lone Working on clients sites/premises where risks are controlled. In situations where an employee or contractor is required to work alone, We will:

- Conduct thorough risk assessments for all tasks involving lone working to identify and mitigate potential hazards.
- Ensure that effective communication methods are in place for lone workers, including regular check-ins and emergency contact procedures.
- Provide training to all employees on the risks and safety procedures for lone working, ensuring they understand how to work safely and what to do in case of an emergency.
- Monitor lone working activities through regular supervision and ensure that lone workers have access to support if needed.

Scaffolders who need to use a harness should never work alone.

5.22 Dealing with the Enforcing Authorities

A Director will meet any representative of an Enforcing Authority e.g. the Health and Safety Executive, Local Authority, Environment Agency, Police etc., unless this responsibility has been delegated to another appointed person. The visiting officer must be directed to the Director or if they wish to proceed unaccompanied the Manager must be notified directly.

Full co-operation must be given to assist them in the execution of their duties.

If enforcement action is taken such as a Prohibition Notice or Improvement Notice issued, then the person to whom it is issued must comply with any immediate requirements and contact a Director and the Health & Safety Consultants directly.
The Health & Safety Consultant will be able to provide the Company with any practical interpretation and advice on the necessary corrective action required for complying with the Notice.

The Director will liaise with the relevant inspector and inform him/her of corrective action taken and confirm this in writing.

If as part an investigation by the enforcing authorities, any employee or sub-contractor working as a Scaffolding Operative is required to make a statement or interview under caution, then the company appointed solicitor should be present.

5.23 Hot Work (Welding, Burning, Cutting or Grinding)

The term 'Hot Work' means any work using equipment that produces heat or source of potential ignition and fire, such as welding operations, gas burning or cutting and abrasive wheel cutting or grinding. A suitable and sufficient assessment of the risk arising out of these activities must be undertaken.

5.24 Work on or near the railway

All projects undertaken for the rail authority or a Network Rail, other Rail Companies and approved contractors on or near the railway must be carried out in strict compliance with the rail authorities document 'Contractor Conditions Safety' (or equivalent document) and their line safety standards. All Operatives, Supervision and Management must be PTS trained to the appropriate level and work must be undertaken in strict compliance to Network Rail, or Other Rail Companies approved risk assessments and method statements.

5.25 Confined Spaces

A confined space can be any space of an enclosed nature where there is a risk of death or serious injury from hazardous substances or dangerous conditions (eg lack of oxygen).

All activities involving work in confined spaces must be carried out in compliance with the Confined Spaces Regulations 1997, Approved Code of Practice and Guidance, introduced in January 1998 and SG21:17 "Entry into Confined Spaces" as minimum standards.

5.26 Mobile Phones

Employees/sub-contract operatives must not use mobile phones whilst operating any vehicle unless that vehicle is fitted with an integrated hands free system (and then keep such calls as short as possible, ringing back when parked in a safe place; never send or read text messages unless vehicle is parked in a safe place).

Employees/sub-contract operatives must have mobile phones (either Company or privately owned) turned off at all times whilst working on or near scaffolding on site.

5.27 Office Safety

All clerical and administration employees are required to receive general office safety instruction and training, as appropriate.

5.27.1 Display Screen Equipment (DSE) User & Operator

The Health & Safety (Display Screen Equipment) Regulations 1992, requires employers to identify Users and Operators (operators are the self-employed, agency workers and contractors) of display screen equipment and to carry out an assessment of their work activities and workstation.

A User (or Operator) is defined as a person dependent on using a display screen, who is required to use equipment every day for a minimum of one (1) hour. Once Users (or Operators) have been identified, a competent assessor will undertake the risk assessment. Following the assessment the control measures established as reasonably practicable will be implement and could include: -

- Redesigning tasks and work routines to include regular breaks.
- Provide correct workplace equipment to improve ergonomics.
- Make changes to the environment e.g. lighting, ventilation, temperature etc.
- Provide User/Operator training and instruction.

5.28 Records Management

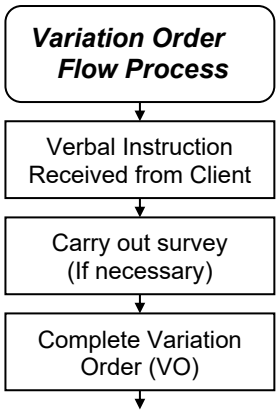
All records of formal monitoring and auditing, accident investigation reports, training records, PPE registers, records of inspection and testing, minutes from review meetings, risk assessments and medical reports shall be kept for a minimum of five years.

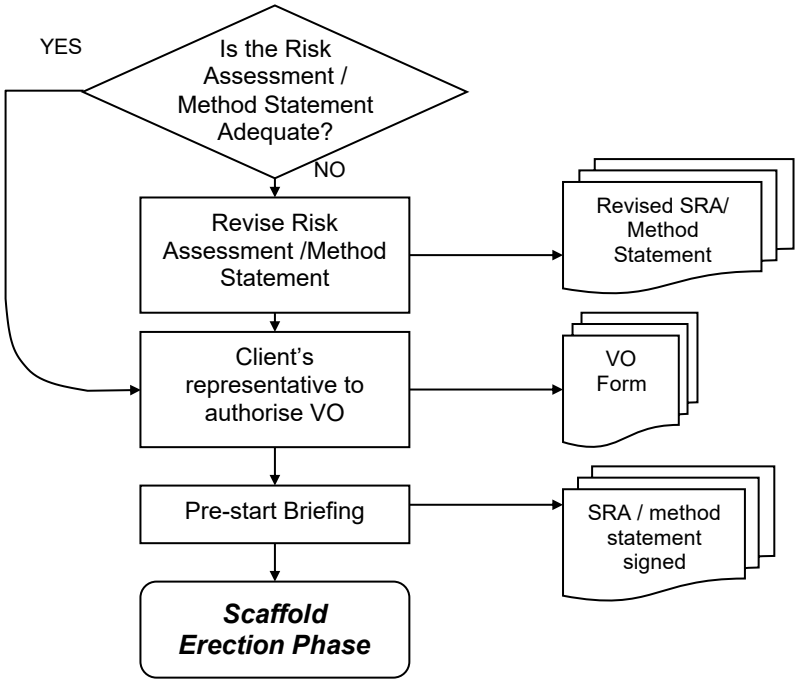
Accident statistics and details of enforcement action should be kept indefinitely. All records should be kept in such a manner that they are ready retrievable and protected where practicable from damage, deterioration or loss.

5.29 Variation Management

Many work-related injuries occur when significant changes are made to the work operation without considering any new hazards that may arise or implementing the appropriate new control measures.

All new work instructions or requests for alterations or modifications from the client that vary from the original scope of work should be directed through the line-manager (i.e. Manager, Supervisor etc). All such variations must be recorded using the appropriate Variation Order (VO) form and signed by the client's representative. Upon receipt of a Variation and while completing the VO form, the line-manager must review the risk assessment and/or method statement and revise them accordingly. This section is summarised in the flow process detailed (next page)**:** -





5.30 Construction (Design and Managements) Regulations 2015

Uniti Scaffolding Ltd has an understanding of the Regulations and understands the duties of:

- The Client
- Principal Designer
- The Principal Contractor
- Designer
- Contractor
- Worker

Uniti Scaffolding Ltd is often engaged as contractors as defined by the Construction (Design and Management) Regulations 2015 and as such will comply with the Regulations as applicable, in particular we will:

- Plan, manage and monitor our work to ensure that it is carried out without risks to health and safety.
- Co-ordinate our work with others in the project team and comply with any reasonable directions issued by the Principal Designer or Principal Contractor, and with any rules in the Construction Phase Health and Safety Plan that are relevant.
- Submit any relevant risk assessments and method statements as required.
- All scaffold designs take into account risks to those erecting, altering, using and dismantling scaffolds with risks that can't be designed out highlighted for separate risk assessments and method statements at all stages.

- Ensure that all operatives are trained and competent to carry out the tasks to which they are assigned and are suitably managed and supervised.

- No operatives will begin work until they have received basic information, such as the site induction from the Principal Contractor, and the contents of relevant sections of the Construction Phase Health and Safety Plan and details of our risk assessments and method statement.

- Consult with our employees on all Health and Safety issues to ensure that hazards are highlighted and reported to improve health and safety.

6. *Measuring Performance*

To gauge success in health and safety performance Uniti Scaffolding Ltd will measure its performance against pre-determined standards. Monitoring performance by means of: -

- *Re-active Monitoring of incidents, accidents and ill health, allowing for data analysis of trends.*

- *Pro-active Monitoring to ensure compliance with the statutory, common law, company and clients minimum performance standards.*

- *Creating key performance indicators (KPI's) to measure against the established performance targets for continuous improvement.*

"What you can't measure, you can't manage."

6.1 Reactive Monitoring

6.1.1 Incident Reporting & Investigation

Certain injuries, ill health and dangerous occurrences are required by law to be reported to the enforcing authority (usually the Health & Safety Executive), under the Reporting of Injuries, Diseases and Dangerous Occurrence Regulations 2013 (RIDDOR), reported as follows:

- Work-related fatalities (Reg 6), Non-fatal (specified injury) to workers (as in Reg 4) notified to enforcing authority by quickest practical means and send report within 10 days.
- Non-fatal injury to a worker (but not a specified injury) who is incapacitated from routine work for more than 7 days, notified to enforcing authority by quickest practical means and send report within 15 days.

- Dangerous Occurrences (Reg 7) reported as in reporting procedures in Schedule 1.

- Occupational diseases (Reg 8) and reporting reported as in Schedule 1.

- Exposure to carcinogens, mutagens & biological agents (Reg 9) and reported as in Schedule 1.

Incapacitation means that the worker is absent, or is unable to do work that they would reasonably be expected to do as part of their normal work. You must still keep a record of the accident if the worker has been incapacitated for more than 3 consecutive days.

As an employer we keep an accident book as required under the Social Security (Claims and Payments) Regulations 1979, that record can be treated as a record for the purposes of RIDDOR and root cause analysis.

However, it is the policy of Uniti Scaffolding Ltd to investigate all accidents and incidents, including near misses. The purpose of the investigation is to identify the causation and to establish and enforce measures to prevent reoccurrence and not to apportion blame.

Some organisations claim to have a 'no blame culture' for accident reporting and investigation to ensure that every employee feels that they can report accidents and co-operate with any investigation without fear of retribution. However, we promote a 'just and fair culture' which is similar to 'no blame', but there may be some apportion of personal responsibility. Investigations must not lay blame indiscriminately; all accident investigations shall be objective, open and fair.

All employees/sub-contract operatives are encouraged to report all accidents or incidents no matter how minor. The reporting of accidents by employees/sub-contract operatives to the Company shall always remain a high profile topic e.g. regularly repeated toolbox talk, notices etc…

Any employee/sub-contract operative who fails to report a work-related accident or fails to co-operate with or deliberately misleads an investigation will be referred for disciplinary action. All injuries must be reported to the immediate line-manager who will ensure that the appropriate level of investigation is undertaken and the records kept. The following matrix is a guide to the appropriate level of investigation required (next page): -

Level of Accident Investigation

	Fatality*	RIDDOR Major Injury*	RIDDOR O7D Injury*	RIDDOR Dangerous Occurrence*	RIDDOR Disease*	3-7 Day Injury	1-3 Day Injury	Minor Injury	Significant Near Miss	Near Miss
Director of H&S	x	x	x	x	x				x	
H&S Consultant	x	x	x	x	x	x			x	

H & S Supervisor	x	x	x	x	x	x	x		x	
Working Supervisor(s)	x	x	x	x		x	x	x	x	x

*Full written investigation report required in addition to the accident report form
ALL ACCIDENTS HOWEVER MINOR TO BE REPORTED TO THE COMPANY SAFETY CONSULTANTS BY TELEPHONE FOR INITIAL DISCUSSION AND ADVICE.

IN THE EVENT OF AN ACCIDENT PLEASE ENSURE THAT PHOTOS ARE OBTAINED OF THE SITE OF THE ACCIDENT AS SOON AS POSSIBLE (to be used for an investigation if required).

The Company Accident Report Form (ARF) must be completed for all accidents. The individual completing the form keeps a copy and the other copy is entered into head office accident file once all the remedial actions are complete and closed out.

In addition to the ARF a full investigation report should be prepared for more serious incidents.

All line-management that lead accident investigations will receive formal investigation training.

It is the responsibility of The Director responsible for safety to ensure that RIDDOR injuries, ill health and dangerous occurrences are reported. However others (e.g. H&S Consultant) may perform this duty if so directed by the Company.

You can make a report:

Online

Go to www.hse.gov.uk/riddor and complete the appropriate online report form. The form will then be submitted directly to the RIDDOR database. You will receive a copy for your records.

Telephone

All incidents can be reported online but a telephone service remains for reporting **fatal and major injuries only**. Call the Incident Contact Centre on 0345 300 9923 (opening hours Monday to Friday 8.30 am to 5 pm).

Post

There is no paper form for reporting for RIDDOR Reporting since the online system is the preferred reporting mechanism; however if you still need to submit a paper report then send to the following address:

RIDDOR Reports, Health and Safety Executive, Redgrave Court, Merton Road, BOOTLE, Merseyside, L20 7HS.

RIDDOR ADVICE

Advice and guidance about what must and does not have to be reported can be found at www.hse.gov.uk/riddor/what-must-i-report.htm or contact the Company Health and Safety Consultants (Safety and Access Ltd) on 0115 979 4523.

6.1.2 Near Miss & Hazard Reporting

Prevention is better than cure! Near misses are painless lessons to learn from. All incidents not resulting in injury (i.e. Near Misses and RIDDOR Dangerous Occurrences) must be reported and investigated. In addition, employees all have a duty to report any hazards identified so that an assessment can be made to eliminate or control the risks arising out of that hazard.

6.1.3 Accident Records, Classification & Statistics

As mentioned in section 6.1.1 above, accident reporting and investigation is an essential part of the Safety Management System and Company policy.

Accident records are compiled centrally at the head office, copies of the Accident Report Forms, RIDDOR F2508 forms and full accident investigations reports are kept.

Uniti Scaffolding Ltd classifies its accidents into the following categories:

RIDDOR = Injuries resulting in Fatal or Major Injury or Over 7 Days absence from work.

3 to 7 = Injuries resulting in absence from work of more than 3 days but less than 7 days

1 To 3 = Injuries resulting in more than one full days absence (not including the day the injury occurred) up to three days absence but returning at the latest by the fourth day.

Minor = All other injuries not incurring absence more than the day of the injury.

Near Miss = Occurrences of damage to property or events where there was risk of injury, but no physical harm occurred.

Accidents are also analysed by type to examine causation and to determine trends or particular areas of concern. For this purpose we divide accident types into further categories, as follows: -

- Fall from Height >2m
- Fall from Height <2m

- Work Equipment Injury
- Exposure to Hazardous Substance
- Slips, Trips & Falls (at the same level)
- Manual Handling Injury
- Others

Accident statistic will be compiled and distributed on a monthly basis. The statistics published are: -

- Actual number of injuries (RIDDOR, 1-3 Day, Minor and Near Miss) for the period and year to date.
- Accident Frequency Rate* (RIDDOR, 1-3 Day, Minor and Near Miss) for the period and year to date.

*The formula used to calculate frequency rate is:

$$\frac{\text{Number of injuries in the period x 100,000}}{\text{Total hours worked during the period}} = \text{Frequency Rate}$$

6.2 Proactive Monitoring

The purpose of proactive monitoring is to ensure that the established performance standards are being adhered to and to help prevent an accident or ill health. The primary objective of the pro-active monitoring is not just to identify failure in the form of unsafe acts or conditions, but to measure success and recognise positive good behaviour, ensuring these are tracked.

6.2.1 Internal Safety Monitoring

Each member of the line-management within the operational hierarchy of the organisation (Director through to first line Supervisors) shall undertake health and Safety inspections at a predetermined frequency, hence the term *'Internal Safety Monitoring'*.

The inspections shall observe workplace operations and be carried out using a checklist style proforma to record the findings.

The Internal Safety Monitoring shall be undertaken in accordance with the following minimum frequency table (NEXT PAGE):

Internal Safety Monitoring Frequency Table

Position	*Frequency of Monitoring*	*Reporting to*
Contracts Manager	Quarterly	Board of Directors
H & S Supervisor	Bi-Weekly	Contract Manager

Copies of the monitoring report are sent to the immediate direct line-manager with a copy to the Managing Director for record keeping purposes. Where appropriate, copies will be issued to the individual responsible for completing a specific action.

6.2.2 Independent Safety Monitoring

Independent Safety Monitoring is similar to the Internal Safety Monitoring but is carried out by the independent Health and Safety Consultants. This monitoring is carried out on a planned basis and reported directly to the Managing Director.

6.3 **Key Performance Indicators**

Key performance indicators or KPI's will be used to measure the specific elements of the Safety Management System as an indicator of health and safety performance, these are tracked by Senior management. The main KPI's used are: -

- Lost time injury frequency rate (LTIFR based on RIDDOR injuries only)
- All injury frequency rate
- Number of health and safety Immediate Action items raised. (These will be measured in the same way as a LTIFR)
- Compliance with the Internal Safety Monitoring schedule
- Compliance with the Toolbox Talk schedule

KPI data is used to review health and safety performance at the various formal review forums detailed in Section 7.

6.3.1 **KPI Targets & Objectives**

The senior management of the Uniti Scaffolding Ltd will set targets year-on-year for improvement based on the KPI's.

However it is important to note that the primary purpose of the KPI's and targets is not to penalise failure but to identify opportunities for improvement and recognise success. It is very important not to place too much emphasis on achieving targets as this may have a negative effect resulting in deliberate under reporting.

7. *Reviewing Performance*

Forums for reviewing performance are essential elements of the Safety Management System for learning from experience and applying lessons learnt; these include audits and compliance.

7.1 Health and Safety Meetings

To achieve excellence in health and safety performance we need to regularly evaluate our performance in order to maximise learning and take appropriate action, thus ensuring *'Continuous Improvement'*.

Health and safety is integrated into all formal review meetings.

A formal dedicated health and safety review meeting will be held at least twice per year attended by Directors, Managers/Supervisors.

An agenda must be set and minutes of the meeting taken to record findings and actions.

The agenda of each meeting must include

a) Significant Issues raised from formal monitoring and auditing.

b) In-company communications and consultations

c) Information received from external parties (HSE, NASC, complaints)

d) Health and Safety performance

e) Review of Health and Safety objectives

f) Accident/incidents (including actions taken)

g) Follow up actions from previous review

h) New or forth coming legislation, codes of practice or best practice advice

8. *Auditing*

Producing systems for auditing the Safety Management System and commitment to continuous improvement involves the constant development of policies, the organisation, approaches to implementation and techniques of risk control.

8.1 Safety Management System Audit

A Safety Management System audit can be undertaken by the Health and Safety Consultants (Safety and Access Ltd), upon request to ensure its effectiveness. A full audit report is produced detailing the findings of the audit and any recommended actions. The actions are tracked to closure.

Appendix A List of relevant Health and Safety regulations

This is not an exhaustive list.

The Health and Safety at Work etc. Act 1974.
The Work at Height Regulations 2005
The Employers Liability (Compulsory Insurance) Regulations 1998.
The Safety Representatives and Safety Committees Regulations 1977
The Health and Safety (safety signs and signals) Regulations 1996.
The Health and Safety (Consultation with Employees) Regulations 1996.
The Management of Safety at Work Regulations 1999.
The Personal Protective Equipment at Work Regulations 1992.
The Personal Protective Equipment at Work (Amendment) Regulations 2022.
The Personal Protective Equipment Regulations 2002.
The Personal Protective Equipment (Enforcement) Regulations 2018.
The Manual Handling Operations Regulations 1992.
The Provision and Use of Work Equipment Regulations 1998.
The Workplace (Health, Safety and Welfare) Regulations 1992
The Health & Safety (Display Screen Equipment) Regulations 1992

The Construction (Design and Management) Regulations 2015.
The Lifting Operations and Lifting Equipment Regulations 1998
Reporting of Injuries, Diseases & Dangerous Occurrences Regulations 2013
The Noise at Work Regulations 2005.
The Control of Vibration at Work Regulations 2005
The Electricity at Work Regulations 1989.
The Control of Substances Hazardous to Health Regulations 2002
The Control of Asbestos Regulations 2012.
The Health and Safety (First Aid) Regulations 1981.
The Health and Safety (Information for Employees) Regulations 1989.
The Smoke Free (Premises and Enforcement) Regulations 2006.
The Regulatory Reform Fire Safety Order 2006.
Corporate Manslaughter and Corporate Homicide Act 2007.
Health and Safety Offences Act 2008.

This list of legislation will be reviewed and updated each year by the Director responsible for safety with the advice of Safety and Access Ltd.

Appendix B Scaffold Design Matrix

Additional bespoke Scaffold Designer input is required on any scaffold or element of a scaffold that is not classed as “TG20 Compliant” by use of “TG20 Compliance Sheets” created from the TG20:21 “eGuide” and the detailed guidance criteria contained in the “TG20:21 Operational Guide”.

The following scaffold structures normally require bespoke Scaffolding Designs.

1. Scaffolds for which a *“TG20 Compliance Sheet”* can’t be produced
2. All shoring scaffolds (Dead, Raking and Flying)
3. Cantilevered scaffolds (if a *“TG20 Compliance Sheet”* can’t be produced)
4. Truss-out Scaffolds
5. Façade retention
6. Access scaffolds with more than the 2 working lifts
7. Buttressed free-standing scaffolds
8. Temporary roofs and temporary buildings
9. Support scaffolds
10. Complex Loading bays (if a *“TG20 Compliance Sheet”* can’t be produced)

11. Mobile Towers
12. Temporary ramps and elevated roadways
13. Tube & Fittings Staircases and fire escapes
14. Spectator Terraces and Seating Stands
15. Bridge scaffolds (if a *"TG20 Compliance Sheet"* can't be produced)
16. Towers requiring guys or ground anchors
17. Offshore scaffolds
18. Pedestrian footbridges or walkways
19. Slung and Suspended scaffolds
20. Protection fans (if a *"TG20 Compliance Sheet"* can't be produced)
21. Pavement gantries
22. Marine scaffolds
23. Boiler scaffolds
24. Power line crossings
25. Lifting gantries and towers
26. Steeple scaffolds
27. Sign board supports
28. Sealing end structures and temporary screens
29. Temporary Storage on Site
30. Masts, Lighting Towers and Transmission Towers
31. Advertising hoardings/banners
32. Rubbish chute
33. Scaffolding for timber frame buildings

Note 1:The above list is not exhaustive and any system scaffold and/or system component that does not comply with manufacturer's guidelines and TG30 (including system scaffolding staircases) as published in handbooks will require a specific design produced by a competent person. TG30 provides definitions of common system scaffolding structures and the creation of *"TG30 Compliance sheets" in conjunction with system scaffold manufacturers guides (current version for basic rosette system, with additional system scaffolds to be introduced in 2025), if the criteria of a "TG30:24 Compliance sheet" and manufacturers guidance does not provide a standard solution then additional design advice should be sought.*

Note 2: The note above (if a *"TG20 Compliance Sheet"* can't be produced) indicates that simple versions of this scaffold can be erected without bespoke design if a "TG20 Compliance Sheet" can be produced.