



**BARRETT**  
INDUSTRIAL COOLING

[www.barrettindustrialcooling.com](http://www.barrettindustrialcooling.com)

# Health & Safety Policy

EHQMS

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**Legionella  
Control  
Association**  
KEEPING WATER SYSTEMS SAFE

## Part 1 – Health & Safety Policy Statement

Barrett Industrial Cooling Limited recognises and accepts its responsibilities under the Health & Safety at Work Act 1974 for providing a safe, healthy workplace and working environment, for all its employees and others affected by its activities.

### Key Areas for Success

The Company will take all reasonable steps to meet this responsibility to provide and maintain a safe place of work and safe working practices. Accordingly, the Company will provide such resources as necessary to meet this intention. Particular attention will be paid to the provision and maintenance of:

- Safe plant, equipment, and systems of work.
- Arrangements for the safe use, handling, storage and transport of tools, equipment and substances.
- Adequate information, instruction, training, and supervision to enable all employees to avoid hazards and contribute positively to their own health and safety at work.
- A safe place of work and safe means of access and egress.
- A healthy working environment
- Suitable welfare facilities.
- Regularly reviewed, maintained and monitored safety programmes and a system for monitoring safety performance of the Company at all levels.

### Accountabilities

The overall responsibility for health & safety will rest with the Managing Director.

The primary responsibility for the health, safety, and welfare of our employees, lies with management at all levels and each manager is accountable for the safety performance of their department. The Company encourages its' employees to be actively involved in ensuring their own safety and the safety of others. The Company reminds its employees of their duty to co-operate in promoting health and safety and, in particular, to:

- Keep their own work area free of all unnecessary hazards.
- Comply with all safety rules that may be in force.
- Report all injuries, near miss incidents and hazardous conditions to their Supervisor.
- Discuss any need they perceive for safety training with their Manager.
- Understanding the neglect of safety or infringement of the law will be treated as a disciplinary matter.

### Consultation

The Company will encourage full and effective joint consultation on health, safety and the environment with employees.

### Monitoring Safety Performance

Day to day monitoring of safety performance is the responsibility of the Director.

### Continuous Improvement

The Company is fully committed to continuous improvement in health & safety within all areas and aspects of its undertaking.

### Policy Review

This policy will be reviewed annually to ensure it remains effective and complies with the latest relevant legislation and codes of practice or other guidance issued.

### Structure of the Policy

The policy is in three parts:

[Part 1](#) – Policy Statement which refers to the Company intentions to manage health & safety.

[Part 2](#) - An organisation and responsibilities section which details how the Company is organised to carry out this policy and the responsibilities of key individuals.

[Part 3](#) - An arrangements section explaining how the Company will carry out this policy.

## Part 2 – Organisation & Responsibilities

Part 1 of this policy places the overall responsibility for health & safety with the Managing Director. This responsibility to manage health & safety effectively is delegated to management at all levels and will be afforded the same effort and resource as any other management function. The details of those responsibilities are as follows:

### **The Managing Director;**

- Has overall responsibility for the content and implementation of the Company Health and Safety Policy and ensuring that it is readily available for all employees.
- Will carry ultimate responsibility for ensuring compliance with current health & safety legislation.
- Will ensure there are procedures in place to monitor and review the Company policy on health & safety and implement change where appropriate.
- Will actively promote a positive health & safety culture within the Company.
- Will delegate authority to other managers for achieving the Company Health and Safety Policy effectively.
- Shall ensure suitable financial provision is made for health & safety obligations.
- Will provide appropriate information and instruction to employees.

### **The Health & Safety Advisor;**

- Will monitor the implementation of the Health & Safety Policy throughout the Company and review its effectiveness by regular safety audits/inspections carried out in various workplaces.
- Shall review health & safety legislation and implement any new requirements.
- Will liaise with managers, employees, sub-contractors and specialists as and when appropriate.
- Shall investigate accidents and implement corrective action.
- Will collate and report any accidents reportable under RIDDOR (Reporting of Injuries, Diseases & Dangerous occurrences regulations 2013).

### **Site Managers, Supervisors & Lead Hands;**

- Will ensure that Risk Assessments and Method Statements relevant to the area of works are current, applicable and are communicated to, and understood by, the employees under their control.
- Shall ensure the correct personal protective equipment is made available and maintained throughout all work activities.
- Will monitor the condition of plant, tools and equipment in use on our operations ensuring dangerous items are repaired or taken out of service.
- Will have regard for the health of their workforce, identifying situations in the workplace that may have the potential to have an adverse effect on their health e.g. contaminated land, fumes, dust and asbestos.

### **Employees;**

- Will take reasonable care for the health & safety of themselves and other persons who may be affected by their actions or omissions.
- Shall co-operate with the Company to enable it to manage health & safety effectively.
- Must read and understand the Company Health & Safety Policy and carry out their work safely and in accordance with its requirements.
- Will ensure that all personal protective equipment provided is properly used in relation to any instruction / training given and in accordance with this Health & Safety Policy.
- Must report any defects of work equipment immediately to their Supervisor.
- Must report any incidents, which have led or might lead to injury or damage to their Supervisor.
- Must report any accidents or near misses to their Supervisor.
- Shall use the correct tools and equipment for the job in hand and in accordance with training and instruction.
- Shall co-operate fully with any investigation, which may be undertaken with the objective of preventing a recurrence of incidents.

## Part 3 - Arrangements

### Risk Assessments

The Company has a duty under the Management of Health and Safety at Work Regulations and other legislation to undertake assessments of its work activities in order to identify significant risks, and determine what measures are required to manage these risks.

The overall responsibility for health & safety risk assessments rests with the Managing Director. Any health and safety risk assessment should follow the process set out below:

- Identify significant hazards, i.e. factors with potential to cause harm, arising from a work activity.
- Identify who can be harmed and how.
- Assess the risk, i.e. the likelihood of the harm being realised.
- Decide what measures need to be taken to eliminate, reduce or control the risk to an acceptable level.
- Implement the control measures and make sure all those involved in or affected by the work activity are aware of what must be done to control the risk.
- Keep the assessment under review to ensure that the control measures are working as planned.
- Ensure availability of risk assessments to all employees.

### Staff Consultation

The Company plan to meet their duties under the Safety Representatives and Safety Committees Regulations 1997 and the Health & Safety (Consultation with Employees) Regulations 1996. The Company will communicate and consult with all employees on the following issues:

- The Content of the Policy
- Any rules specific to site or job
- Changes in legislation or working best practice.
- The planning of health & safety training
- The introduction or alteration of new work equipment or technology.

It is intended that staff meetings will take place at least 4 times per year. The availability of employee representatives and the nature of the communication may dictate the frequency of the meetings.

### Construction Design & Management Regulations 2015

The Company will ensure it carries out its duties in regard to the Construction (Design & Management) Regulations 2015. Typically, the Company shall assume the role of Contractor. Under the regulations, Contractors are required to comply fully with the site rules of the Principal Contractor / Customer and the Principal Designer. If acting as Principal Contractor, the Company will liaise with the Principal Designer and produce the required Construction Phase Health and Safety Plan for the project.

When operating as a Contractor / Sub-contractor, the Company shall complete and submit its own health and safety plan to comply with the Principal Contractor's required Construction Phase Health and Safety Plan and, dependant on the contract, the Company's own policy and rules may apply additionally, if approved.

When the Company is working on a Customer's site on the Customer's behalf, the Company employees will adhere fully with the requirements of the Customer's health & safety policy and rules. In these cases, it is the Customer's or Principal Designer's responsibility to ensure that a copy of the policy and rules are available.

Under the Regulations, the Company's specific responsibilities as a Contractor will additionally include;

- Plan, manage and monitor construction work under our control so that it is carried out without risks to health and safety.
- For projects involving more than one contractor, co-ordinate our activities with others in the project team.
- For single contractor projects, prepare a construction phase plan.

## Emergency Procedures

The Company implements a procedure that outlines the methodology for controlling emergency situations. Despite our organisation's best efforts, emergency situations can occur, and therefore effective emergency preparation and response can reduce injuries, prevent or minimise environmental aspects, mitigate health and safety hazards, protect employees and neighbours, reduce asset losses and minimise downtime.

The Managing Director ensures that;

- Emergency drills are conducted at Head Office.
- Appropriate emergency equipment is provided and maintained.
- Adequate provision of trained First Aiders and Fire Wardens on site and at Head Office.
- Emergency procedures are established and co-ordinated at our Customer's premises.

## Accident / Incident Reporting & Investigation

The Company intends to comply with the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) 2013 by reporting the following:

- Fatalities.
- Occupational Diseases.
- Dangerous Occurrences.
- Specified injuries (Regulation 4).
- Injuries which have caused over 7 days incapacitation (not counting the day on which the accident happened).

All accidents shall be reported to the Site Supervisor and the details recorded in the Accident Book. Serious accidents and incidents where hospital treatment is required must be reported to the Health & Safety Advisor or Managing Director as soon as possible following the incident.

The responsibility for forwarding notification to the enforcing authorities rests with the Managing Director.

The Managing Director will be responsible for investigating the causes of an accident, in order to;

- Determine the causes with a view to preventing a recurrence.
- Gather information for use in any criminal or civil proceedings.
- To confirm or refute a claim for industrial injury benefit.
- To prepare notification to be made to the Health & Safety Executive

The aim of an investigation will be to seek to answer the following questions:

- WHAT caused the accident?
- WHO was involved?
- WHEN did it occur?
- WHY did it occur?
- HOW could have it been prevented?
- HOW can a recurrence be prevented?

## First Aid

The Company believes that best practice is to ensure our employees have access to a trained First Aider or Appointed Person (someone who can take charge in the event of an accident).

## Provision and use of Work Equipment

The Company plans to meet its duties under the Provision & Use of Work Equipment Regulations (PUWER) 1998, by ensuring that;

- An employee shall not use any work equipment for which they have not received specific training.
- An assessment will be undertaken before new equipment is introduced into the working environment in order to ascertain that the equipment is suitable for its intended use.
- All controls for work equipment are clearly visible and identifiable.

- All electrical, lifting and fall arrest equipment will be subject to an inspection every 6 months. The inspection will be formally recorded and will detail any remedial action where necessary.
- Employees shall not misuse work equipment or remove any guards that are in place to minimise a specific risk.
- Any faults or damage found on equipment is immediately reported to the Site Supervisor.
- Equipment brought to work by employees is subject to the authorisation from the company.

## Personal Protective Equipment

PPE will only be introduced as the control of last resort. It will be provided free to employees and will be suitable for the particular risk and the employee.

Training will be provided for employees on the safe use, storage and maintenance of the relevant equipment before issue. Employees have a legal duty to wear PPE as specified in relevant site rules, risk assessments and method statements. Each employee will have a PPE issue record kept on file.

## COSHH – Control of Substances Hazardous to Health

Before any hazardous substances are used during a work process, a material safety data sheet (MSDS) will be requested from the supplier and an appropriate assessment made of the risks from that substance will be undertaken, in line with the Control of Substances Hazardous to Health Regulations (COSHH) 2002.

Alternative less harmful substances will be used wherever possible.

Assessments will consider storage, handling, how the substance is used, the quantity used, the routes and level of exposure, PPE requirements and emergency actions.

Supervisors will brief staff on any hazard or substance precautions, with written records of Tool Box Talks.

An inventory of all substances and materials hazardous to health is held at head office.

Health surveillance will be provided when determined as appropriate in the COSHH assessment.

## Asbestos Awareness

The hazard associated with working with Asbestos Containing Material (ACM) is that when disturbed, asbestos fibres are released. Asbestos fibres are known to be the cause of asbestosis (asbestos induced lung fibrosis), mesothelioma (cancer of the pleura or lining of the lung) and bronchogenic lung cancer.

It is Company policy that strictly no work shall be undertaken with ACMs. Employees will receive annual asbestos awareness training that will assist them in identifying ACMs and educate them on precautionary control measures and steps to take should they come in contact with ACMs.

## Manual Handling

The Company has a duty under the Manual Handling Regulations 1992 to ensure that all manual handling operations are assessed to determine the risk to those engaged in the activity. The term 'manual handling' is used to denote any job or task where human effort is required to move an object, including lifting, lowering, pushing and pulling.

The Company will:

- Provide mechanical handling aids if appropriate to the task.
- Develop work schedules to minimise instances of manual handling.
- Provide manual handling training for all employees.
- Consider an employee's physical ability before they carry out manual handling operations

## Health Surveillance

In addition to their welfare and safety, the Company recognises its obligations to take care of the health of its employees at work. The Company shall;

- Appoint qualified consultants to provide an annual occupational health check to ensure the individual's physical and psychological capacities are properly matched to the work they undertake.
- Ensure the results of health surveillance are provided to employees and retained by the Company.
- Take action to further control risks and protect employees, based on the findings of health surveillance carried out.

## Welfare Provision

The Company will ensure that adequate welfare facilities are made available to all employees. As a minimum, facilities will include a toilet, wash facilities and a rest area.

## Health & Safety Site Inspection

Each workplace will receive a weekly health, safety and environmental inspection. Unsafe conditions identified will be reported to the responsible manager who is expected to remedy them as soon as possible.

## Lone Working

Lone working should not be allowed where:

- There cannot be adequate supervision for the degree of risk.
- The employee has a medical condition which means they are at greater risk or could not cope with an emergency.
- Where the employee lacks the training to understand the problems that could arise and how to deal with them.
- The equipment needs more than one person to operate it safely.
- The task needs more than one person.
- There is entry into confined spaces.
- Working with certain chemicals

## Display Screen Equipment DSE

The Company will undertake a risk assessment of DSE users and their workstations.

The Company understands that DSE users have a right to eye and eyesight tests and corrective eyewear will be provided when needed free of charge (or an equivalent contribution made toward the cost of a private prescription).

## Legionella Control

In recognition of our duty under the Health & Safety at Work Act 1974, Management of Health & Safety at Work Regulations 1999 and the Control of Substances Hazardous to Health Regulations, the Company undertakes to:

- Identify and assess the risk of legionella infection to its employees, contractors and visitors arising from the cooling towers, over which the Company has control on a particular project, are managed in accordance with the current legislation.
- Ensure that adequate resources are available to provide appropriate information, instruction, training and supervision to all employees.

## Confined Spaces

Work in confined spaces is covered by the Confined Space Regulations 1997. A confined space is a place where there is a reasonably foreseeable risk of serious injury from hazardous substances or conditions within the space or nearby.

Risks will be identified during the planning process. Where possible, work in a confined space should be avoided in the first instance. If this is not possible, then a safe system of work will be followed.

The Company will ensure that all confined space operations are carried out with the following:

- Appointment of a Supervisor
- Permit to work
- Trained and competent operatives
- Preparation of emergency arrangements
- A dedicated stand by man with adequate means of communication.
- Mechanical and electrical isolation
- Continuous air monitoring
- Provision of intrinsically safe tools and lighting if required.

## Work at Height

Falls from height are the most common cause of major injury to those working in the construction industry. We will provide a safe working environment for all employees who may be required to work at height. We will achieve this by:

- Identifying work activities that may involve working at height.
- Eliminating the need to work at height whenever it is reasonably practicable to do so.
- Ensuring that, where work at height cannot be eliminated, we use the risk assessment process to evaluate and manage risk.
- Implementing a safe system of work that will prevent falls from persons, materials and equipment.
- Providing suitable plant and equipment to allow safe access for persons and materials.
- Ensuring working platforms and any supporting structures are appropriate and designed in accordance with the current standards.
- Ensuring that regular inspections of all equipment required for working at height are undertaken.
- Providing adequate information and training to ensure that only competent persons are engaged in working at height.

## Respiratory Protection Equipment

All work that involves the use of respiratory protective equipment (RPE) must be carried out in a way which removes or reduces the risk of injury to employees. RPE is the last line of protection against hazards

Prior to any work involving the use of RPE, the Company will ensure that;

- A suitable and sufficient risk assessment of the task has been carried out to identify the correct selection and intended use, and that employees understand the correct procedures for carrying out such work.
- Training will be provided to employees involved in the selection, wearing, storage and/or maintenance of RPE.
- Face fit testing is conducted to ensure the RPE fits the wearer correctly.
- safe and clean storage facilities are provided for all RPE.
- Employees are aware that RPE shall be checked before each use.
- A maintenance plan is in place for all RPE.

## Employee Training & Development

The Company is committed to encouraging, supporting and delivering training and development for all employees to ensure the workforce is adequately equipped with the knowledge, skills and competencies to perform well in their current work-role and help guide them to their full potential. Upon employment, the employee will undergo an induction process at the Company's head office. This will enable the Company to assess the needs of the individual and arrange further training if required.

An annual performance appraisal will be undertaken to:

- Align the responsibilities of each employee role.
- To encourage open communication between the management and staff.
- To document employee growth and development needs as well as achievements.

## Noise at Work

The Control of Noise at Work Regulations 2005 (Noise Regulations 2005) require employers to prevent or reduce risks to health and safety from exposure to noise at work. Employees have duties under the Regulations too. The Regulations require us as an employer to:

- Assess the risks to your employees from noise at work.
- Take action to reduce the noise exposure that produces those risks.
- Provide your employees with hearing protection if you cannot reduce the noise exposure enough by using other methods.
- Make sure the legal limits on noise exposure are not exceeded.
- Provide your employees with information, instruction and training;
- Carry out health surveillance where there is a risk to health.

## Hand / Arm Vibration

The company will put in place measures to protect employees from the risks of Hand Arm Vibration Syndrome (HAVS), which can be caused by exposure to vibration. These measures shall include;

- Assessing the risks from vibration exposure.
- Taking steps to reduce vibration exposure.
- Taking into account vibration risks when purchasing or hiring equipment.
- Providing training and information for employees on the risks from vibration.
- Providing health surveillance where the risk assessment shows that this is appropriate.



4<sup>th</sup> January 2022

**John Barrett**

**Managing Director**

For and behalf of Barrett Industrial Cooling Limited