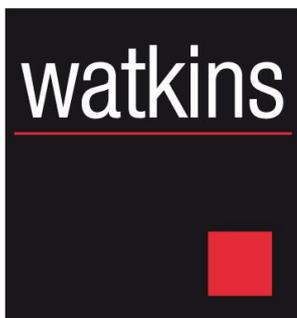


Health and Safety Policy



- mechanical
- electrical
- plumbing

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Appendix 1 - Diagram of Health and Safety Governance and Organisation

Appendix 2 - Simplified Diagram of Health and Safety Management System

Prepared by:	Director
Endorsed By:	HSE Committee
Approved By:	Board of Directors
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1. Preface

Watkins M&E Group seeks to create and maintain an efficient and productive working environment that promotes excellence in our services and supporting activities, whilst enhancing the lives of those who work here.

It is a fundamental principle that such a working environment should be, as far as possible, safe and without risks to health. To this end, Watkins takes most seriously the duty of care that it has to ensure the safety and wellbeing of all its employees, as well as that of visitors and others who may be affected by Watkins' activities.

This Policy sets out the commitment of the Board of Directors to health and safety. It outlines a framework to enable Divisional Directors, Managers, and others in a supervisory capacity to provide, through effective management of safety, a safe and healthy workplace.

The management and mitigation of risks to health and the control of workplace hazards are the responsibility of each and every one of us. This policy applies to all of us - every member of Watkins. We must all make it a key objective to be a personal example of good practice in relation to health and safety, helping to ensure that Watkins remains a safe and healthy organisation.



Tony Murphy
Director

2. Statement of Intent

Watkins M&E Group and its subsidiaries (Watkins Plumbing Ltd, Watkins Mechanical Ltd) is committed to ensuring the health, safety and welfare of its employees, contractors, visitors and the public in the company's workplaces and also the health and safety of those who may be affected by its operations. In securing workplace health and safety, this organisation promises to pursue best practice, continuous improvement and to fulfil its statutory duties with regard to OHS at all times.

To achieve this commitment, Watkins M&E Group Senior Management accepts that it must adopt high standards of Occupational Health and Safety Management and aims as far as is practicable by:

- The identification, assessment and elimination or reduction of risks to health and safety within the workplace;
- Senior Management recognising the key role of Consultation with employees, contractors and their representatives on health and safety issues within the workplace;
- Compliance with relevant OHS legislation, regulations and best practice;
- The provision of adequate human, technical and financial resources for the management of OHS;
- Continuously improving the OHS all levels of the organisation;
- Considering the health and safety impacts of our business decisions, including purchasing, equipment design and organisational change;
- Providing and maintaining safe equipment and systems of work for our employees and contractors in the workplace;
- Providing employees and contractors with such information, training and supervision, as is necessary to enable them to work in a manner that is safe and without risks to health and safety; and
- Taking all reasonable measures to ensure the premises, plant, equipment and processes, are safe and without risk to health, safety and welfare of employees, contractors, the public and visitors to our workplaces.

Watkins M&E Group Divisional Directors / Managers are responsible for implementing this policy and are accountable to the Board of Directors for performance. The Divisional Directors are supported by a team of Health and Safety professionals lead by and accountable to, the Health, Safety and Environment Director.

The conduct of every person under the control of the Company is expected to be such that it does not contribute to the occurrence of incidents or the creation of hazards, which may endanger the health and safety of others. The Company encourages all employees and others who visit our site to regard incident prevention and safe working as a collective and individual responsibility.

This policy will be reviewed by the Health, Safety and Environment Director in conjunction with the H&S Professionals, H&S Committee on an annual basis and as required reflecting changes in the organisation or Health and Safety legislation.



Tony Murphy
Health, Safety & Environment Director
Date: 15/02/2014

3. Outline Organisation and Governance Structure

3.1. Board of Directors

The Board of Directors has ultimate responsibility for health and safety in Watkins M&E Group. The Board will also appoint an independent member to act as health and safety 'champion' (HSE Director). It has delegated responsibility for health and safety management to Management Team.

3.2. Management Team

Watkins Management Team includes the Divisional Directors, Operational Managers, and Contract Managers/Engineers, advised by the Health and Safety Committee and Health and Safety Professionals. They are responsible for implementation of health, safety, welfare and fire safety policies, legislation and best practice.

3.3. Health and Safety Management Committee (HSMC)

The HSMC, which is chaired by the HSE Director, acts in a management capacity on matters of occupational health and safety to Watkins, its membership is representative of Division Management and includes representatives of the Board and Management Team. The HSC will review the management of health and safety, provide direction, advise on policy and best practice and facilitate the sharing of this throughout Watkins.

3.4. Health and Safety Consultative Committee (HSCC)

The HSMC, which is chaired by the HSE Manager, acts in a consultative and advisory capacity on matters of occupational health and safety to Watkins, its membership is representative of all divisions at an operational level. The HSCC will facilitate consultation with all personnel and provide recommendations to the HSMC.

A Diagram of Watkins M&E Group Health and Safety Governance, Organisation and Consultation are given in Appendix 1.

4. General Outline of Organisation and Responsibilities

4.1. Director

As the principal managerial and administrative officer in Watkins M&E Group, the Director has a legal responsibility, alongside the Board, for ensuring that Watkins complies with relevant health and safety legislation and, in particular, for:

- Ensuring that Watkins has a general policy on the management of health and safety and that this policy is communicated to all employees.
- Ensuring that appropriate structures, systems and procedures are in place to secure effective implementation of that policy.
- Attending the Health and Safety Management Committee to ensure effective consultation with employees via their representatives.

The Director also has the authority to take whatever executive action is considered necessary to prevent serious harm to individuals or to property; in exceptional circumstances, this may include summarily closing down buildings, sites, operations or activities.

On a day-to-day basis, the Director of HSE and the HSE Manager act on behalf of the Director in discharging his/her responsibilities for the management of health and safety.

4.2. Health, Safety and Environmental Director

The HSE Director, reports to the Director who in turn reports to the Board. Is responsible for the work of Health and Safety Department (Manager and Consultants) and in particular for ensuring:

- That appropriate measures are taken to promote an effective health and safety culture within Watkins, that an appropriate health and safety strategy is developed, that is aligned with the company strategy.
- That Watkins Health and Safety Policy and Procedures are reviewed regularly, remain appropriate and fit for purpose, and comply with legislative requirements that effective communications, implementation, inspection and audit systems are in place.
- That implementation of Watkins Health and Safety Policy and Procedures is appropriately and regularly monitored and evaluated.
- Employee representatives are appropriately involved as equal partners in delivering and implementing Watkins health and safety objectives that appropriate training is provided to staff that have significant responsibilities in the management of health and safety.

In the absence of the Director, the HSE Director is authorised, on the advice of the HSE Manager, to take appropriate executive action to prevent serious harm to individuals or to buildings.

4.3. Health, Safety and Environment Manager

The Health, Safety and Environment Manager, reports to the HSE Director who in turn reports to the Director. Is responsible for the work of Health and Safety Department (Manager and Consultants) and in particular for ensuring:

- Advising and assisting Directors and Management in complying with Health and Safety Legislation, creating a successful safety culture throughout the Company.
- Specifically preparing, monitoring and reviewing Company Safety Policy and other Safety Documentation.
- Maintain liaison with the HSE, outside training establishments and organisations and make recommendations for improvements in the safety systems adopted by the Company.
- Establishing, in co-operation with operational staff, Management Systems and Organisational Controls.
- Advise on legal requirements affecting safety, health and welfare and implementation of the Company Safety Policy.
- Advise on provision, suitability and use of protective clothing and equipment.
- Advise on suitability, from safety viewpoint of new and hired plant and equipment and the need to maintain test certificates.
- Advise on potential hazards to health and safety on Company premises or new contracts before work starts, including the safety organisation and fire precautions required.
- Assist in creating new Risk Assessments / Method Statements.
- Advise on methods of safe working arising from new construction projects in conjunction with the Contracts Manager/Engineer (Health & Safety Plan).
- Carry out Investigate Accident and Near Miss Situations.
- Ensure that information on all accident and dangerous occurrences is recorded and reported to the Directors. Prepare accident statistics at regular intervals.
- Assess training needs of all levels of employee and in conjunction with operational staff, allocate training on the basis of priorities.
- Keep up-to-date with recommended Codes of Practice, Health and Safety Executive Guidance Notes and new Safety Literature and circulate information applicable to each level of employee.
- Take part, as often as possible, in discussion with Management / Operatives on Health and Safety matters.
- Foster at all workplaces, an understanding that injury prevention is an integral part of business and operational efficiency.
- Organise and chair (monthly) Health and Safety Meeting.
- Use meeting as a platform to review progress, inform / train Managers.
- Carry out regular monitoring of site reports with recommendation and action plans for non-compliance. Carry out site inspections.

- The management and control of Health and Safety Advisors, including workload, reporting procedures training etc
- Review and monitor Fire Risk Assessments to all Company properties.

The HSE Managers / Consultants role provides advice and guidance on company policies legislation and other guidance. In the absence of the HSE Director, the HSE Manager is authorised to take appropriate executive action to prevent serious harm to individuals or to buildings.

These general duties and responsibilities are in addition to specific responsibilities detailed in Watkins Procedures.

4.4. Operational Managers / Divisional/Subsidiary Directors

Operational Director / Divisional Directors are responsible, on a day-to-day basis through the Director, for ensuring compliance with the requirements of legislation and of Watkins Safety Policy and associated documentation in their division. This includes ensuring that there are effective health and safety management systems in place to provide a safe and healthy environment for employees, students and third parties. Delegating the authority for managing health and safety to 'competent persons' (people who have the knowledge, skill and experience to judge the hazards, risks and control measures necessary) does not remove any responsibility or accountability from the Operational Manager / Divisional Directors.

These general duties and responsibilities are in addition to specific responsibilities detailed in Watkins Procedures.

4.5. Contract Managers / Contract Engineers

Contract Managers and Engineers have responsibilities for the day-to-day application of company policies on a site level. Contract Managers and Engineers are designated and controlled by Operational Directors and Managers. They are responsible suitable and sufficient supervision and resources are available to satisfy company policies in particular ensuring that:

- Understand the company policies and procedures for health and safety in the workplace and ensure that those for whom they are responsible appreciate their accountability for health and safety of employees under their control or others who may be affected by the work activities. Institute a procedure in conjunction with Safety Advisors for monitoring the safety performance for the workplace to ensure the provisions of this Policy are achieved and safe systems of work are being followed.
- Ensure that a detailed risk assessment is carried out prior to work starting on each Contract and that the provisions required by the Site Safety Plan are in place.
- Organise the workplace so that the work is carried out to the required standard with the minimum of risk to personnel, equipment and materials. Safe systems of work for all operatives, including those of Contractors or Sub-Contractors, must be established and approved before work starts. Emergency procedures must be agreed and communicated to all at the workplace.
- Establish a system for monitoring the registers, records and reports to ensure that they are up to date, in order, and have been actioned. Ensure that the appointees as 'competent persons' are adequately trained, have sufficient knowledge and experience to carry out

their functions. The systems established and appointments made should be included in the Safety Plan.

- Ensure that all Supervisors/Trades Foreman, Sub-Contractors are made fully aware of their accountability for safety and health for all employees at the workplace for which they are responsible. This includes the issue of clear instructions to them on their responsibilities for establishing and maintaining safe systems of work and for ensuring that their personnel do not take unnecessary risks.
- Plan and maintain a tidy workplace. Arrange delivery and stacking of materials to avoid excessive manual handling and risks from double handling. Position plant effectively to handle loads with consideration given to foundations, work surfaces and operating place to minimise the risks of loss, damage or injury to persons, plant and materials.
- Ensure that suitable protective clothing and equipment is available where appropriate, or required by legislation, and that it is used. Reprimand employees and others where failure to make use of clothing or equipment will put at risk their or others' health and safety.
- Ensure that adequate facilities are available to protect the health and welfare of employees. Appoint adequate numbers of qualified first aiders and ensure that provision is made for the supply of first aid equipment as required by current legislation. Ensure that the names of those appointed and the provisions made for first aid are communicated to employees.
- In conjunction with the H&S department, investigate and report all accidents and dangerous occurrences and ensure that appropriate remedial measures are taken to prevent a recurrence.
- Release staff and operatives for safety training on or off site, where changes in responsibility, in work practices, or for regular updating is required.
- Co-operate with the Safety Department to achieve the aims of company policies, procedures or statutory requirement and act upon his recommendations.
- Ensure that new employees, Contractors, or Sub-Contractors' supervisors, Client representatives and visitors are instructed on the site rules, procedures, potential hazards and control measures adopted to minimise the risks to health and safety in the workplace.
- Set a personal example in achieving the aims of the companies' policies and procedures. This includes the wearing of appropriate protective clothing and equipment as well as following the rules and procedures for the workplace. Commend those who maintain high standards and reprimand, in accordance with personnel procedures, those who fail to maintain standards of health and safety.

These general duties and responsibilities are in addition to specific responsibilities detailed in Watkins Procedures.

4.6. Contract/Design Engineers

Engineers are responsible for technical aspects of the design and installation of equipment. They are responsible to the Operational Manager / Directors. They have responsibilities to ensure that:

- Ensure that (where applicable) designers identify and factor in the hazards associated with installation and on-going maintenance and reduce the risk of these hazards so far as is reasonably practicable.

- Be familiar with the requirements of the projects Site Safety Plan and Risk Assessment requirements.
- Ensure that any sub-contractor engaged by Watkins are on the approved contractor list, have appropriate risk assessments relating to the work and are aware of Watkins safety policies.
- Set a personal example by complying with the Policy and procedures for health and safety by wearing the required safety protective clothing and/or equipment and following workplace rules.

These general duties and responsibilities are in addition to specific responsibilities detailed in Watkins Procedures.

4.7. Site Supervisors / Foremen

Site supervisors/foreman reports to the Contract Managers/Engineers who in turn reports to the Operation Managers/Directors. Site Supervisors are responsible for day-to-day supervision and direction of site activities and in particular for ensuring:

- They carry out Site Inductions for all new Operatives to site.
- They are familiar with the safe working practices applicable to the work on which their gangs are engaged (see Watkins Health & Safety Plan), and insist that they are obeyed.
- They familiarize themselves with Site Safety Rules and ensure all operatives are inducted and follow instructions.
- They incorporate safety instructions with routine orders and see that they are obeyed.
- Carry out when required, Tool Box Talks, safety arrangement checks and plant checks.
- Ensure Safety Plan and other safety notices are clearly shown in container, working closely with Supervisor and Safety Advisor in achieving Company aims.
- They assess work areas before allowing operatives access for work. Ensure appropriate Risk Assessments are in place (a) by checking our white file and (b) checking our operatives have seen, understood and signed it. (c) If assessments are not available checking that either you are able to assess risks - complete form and enter into white file OR work is stopped until a Line Manager is contacted and who will organise a suitable Risk Assessment. Only then can work be allowed to proceed.
- They restrain men from taking risks and report any potential hazards to the Site Manager/Site Agent.
- They encourage employees to work safely whilst on site.
- All appropriate protective clothing, including hard hats is worn when required.
- They commend and encourage operatives who by action or initiative eliminate hazards.
- They discourage horseplay on site and reprimand those who constantly fail to consider their own well-being and that of others around them.
- They report defects in plant or equipment to Site Manager/Site Agent.
- They ensure that plant or equipment is correctly operated and used only by competent operatives. If necessary, training in safe operation should be implemented and recorded.

- They set a personal example.
- Make sure accidents are reported into site Accident Book and a Report is completed and sent to the Health and Safety Department.

These general duties and responsibilities are in addition to specific responsibilities detailed in Watkins Procedures.

4.8. Site Operatives - Includes Directly Employed Staff & Sub-Contractors (CIS).

Site Operatives report to the Supervisors/Foremen who in turn reports to the Contract Managers. Site Supervisors are responsible for day-to-day supervision and direction of site activities and in particular for ensuring:

- Take care of himself/herself and all colleagues and other personnel on site, particularly new starters and young people.
- Use the correct tools/equipment for the work being undertaken at any particular time.
- Use all appropriate protective clothing, including hard hats are worn when required.
- Keep tools and equipment in good condition and report defects in plant and equipment.
- Avoid improvising, which entails unnecessary risks to themselves or others.
- Warn other employees, colleagues, Sub-Contractors of known hazards.
- Refrain from intentionally or recklessly interfering with, or misusing anything provided in the interest of health, safety and welfare.
- Set a personal example and suggest ways of eliminating hazards.
- Refrain from horseplay on site.
- Know, understand and follow Site Safety Instructions, including Site Safety Plan.
- Take a Safety First approach to all work, if in any doubt contact your Supervisor before starting.

These general duties and responsibilities are in addition to specific responsibilities detailed in Watkins Procedures.

4.9. Office Manager

Office Managers report to Divisional Directors who in turn report to the board. They are responsible for responsible for day-to-day administrative management of the office environment and in particular for ensuring:

- Be familiar with the relevant sections of Watkins Policy and ensure that these provisions and safe practices are observed, reporting any failures and taking any necessary steps to ensure failures to do not reoccur.

- Ensure that a First Aid appointed person is on the premises during business hours and that first aid boxes are maintained at the appropriate level in positions known to all employees.
- Ensure competent Fire Marshal has been nominated. Liaise with the Fire Brigade on fire prevention and in particular ensure that fire fighting equipment is maintained and positioned as required. Ensure that regular emergency fire procedures are undertaken, including the maintenance of clear escape routes and control of inflammable materials within hazardous areas.
- Ensure that all required registers and reports are completed punctually and kept in a safe place.
- Where necessary attend health and safety induction and training sessions applicable to the office workplace.
- Keep the workplace tidy, developing a personal concern for safety of others and particularly newcomers and young people, avoid improvising and taking unnecessary risks. Warn new employees of known hazards and ensure that they refrain from horseplay.
- Health and welfare facilities (first aid, toilets, changing accommodation) must not be abused and where damaged this should be reported and rectified.
- All employees have duties under current legislation, in particular to co-operate with their employees where the employer has legal duties to fulfil. Employees are to be encouraged to suggest ways of eliminating hazards.

These general duties and responsibilities are in addition to specific responsibilities detailed in Watkins Procedures.

4.10. All Employees

All employees have a responsibility for their own health and safety, and that of others who may be affected by their work or study and their acts or omissions. All employees have the right not to proceed with any activity if they feel it poses a danger to their health and safety or that of others and raise their concerns with an appropriate line manager.

Employees must:

- Take reasonable care of themselves and cooperate with the Watkins on health and safety matters.
- Conduct their duties safely and in accordance with Watkins Health and Safety Policy, Procedures, local instructions and any relevant legislation
- Not interfere with or misuse anything provided for health and safety
- Help Watkins to meet the duties imposed upon it where necessary
- Make themselves aware and follow the contents of the Health and Safety Policy and associated documentation on the company intranet.
- Bring any breaches of the Health and Safety Policy to the attention of their line manager or Health, Safety and Environment Manager

- Call the appropriate person if someone becomes unwell or has an accident or 'near miss', or if there is a dangerous occurrence such as fire
- Report all work-related illness, accident, near miss or fire in a timely manner
- Notify their line manager if they have a condition affecting health which may be caused by, or made worse by, work activities; alternatively they may notify the HSE Manager (in both cases this information will be treated with appropriate confidentiality).
- Undertake health and safety training and induction as appropriate to their work
- Report any unsafe or unhealthy working conditions, or suspected faults in buildings, building fabric, or in any equipment to their line Manager and/or HSE Manager.
- Assist any visitors who may not be familiar with Watkins procedures, to the best of their abilities.

These general duties and responsibilities are in addition to specific responsibilities detailed in Watkins Procedures.

5. General Statement - Arrangements for Health and Safety Duty-holders

The principal aims of the Watkins' Health and Safety Policy are to reduce risk to people and property and to achieve best practice in complying with its statutory duties.

The nature of the Watkins' activities means that these risks are complex and our statutory duties, extensive. As stated previously, role-holders are assigned responsibilities to implement particular activities and actions. The building blocks of the Watkins' health and safety management system are:

- Risk assessment (the careful examination of the elements in work or study that could cause harm, and the implementation of effective control measures, or precautions which can minimise these risks).
- Clear explanation of the responsibilities and actions placed upon specified role-holders.

Together, these lead to safe systems of work that enable managers and employees to identify hazards and develop measures to minimise the risks.

6. General Statement - Arrangements for Health and Safety Procedures

The detailed arrangements for individual health and safety topics are set out separately as a suite of controlled and consistent procedures on the company intranet. The protocol for each topic (for example health and safety committees, accident reporting and investigation, first aid, radiation protection and fire safety) contains the following information:

- Operational 'standard' or 'statement' - which formally sets out the Watkins' expectations from people in relation to health and safety management practice.
- 'Required roles and actions' - clearly sets out which role-holder (who carries the responsibilities outlined in this Policy) needs to perform each action. These roles include Directors, Managers, Supervisors, and so on.
- Detailed 'guidance' - further information to provide role holders with an understanding of the actions they need to take to fulfil the duties laid out in the Health and Safety Policy.
- Additional forms, checklists, procedures and other useful information.

To create each standard, procedure, protocol the Health and Safety Department follows the agreed consultation processes. This ensures that the information for each protocol meets requirements whilst assuring legal compliance.

7. General Statement - Arrangements for Competence and training

To enable each duty holder to carry out their responsibilities effectively and ensure compliance with statutory requirements, they are required to ensure competent people can carry out their duties. To support line managers to develop competence in their staff, Watkins will provide a dedicated programme of essential training and development which all relevant employees are expected to attend. Further information on the training programme is available on the company intranet under training.

8. General Statement - Arrangements Monitoring and Auditing

The monitoring of health and safety is based on the health and safety management system described in this Policy. This includes a range of mechanisms that facilitate approaches to check progress, including:

- Inspection - scheduled formal examinations of the 'on-the-ground' situation by the Health and Safety Department in consultation with safety representatives. The inspection highlights areas of concern so control measures can be put in place before any harm can be caused.
- Spot-checks - a member of the Board, health and safety staff and safety representatives pay an unannounced visit to a site or office location to check that the expected health and safety standard are being met. This also demonstrates continued commitment to health and safety leadership.
- Audit - Health and Safety Services carries out this planned, independent, detailed process to collect evidence of the effectiveness of local systems for managing health and safety risks, using both internal and external audits.
- Review - The Board, Director, Operational Directors and the Health and Safety Department look at the current health and safety position (using reports from inspections, audit, trend analysis and so on) to assess progress.
- Data collection - where trend analysis, Key Performance Indicators (KPIs) and benchmarking are used to define measure and compare patterns and progress in health and safety practice.

This system of monitoring allows for a 'no surprises' approach to health and safety management at Watkins. For more information on the detail of the monitoring protocol see the company intranet.

A schematic of the health and safety system is attached as an Appendix. The system has been developed to be easily explored electronically on the company intranet; paper-based information is also available. Watkins is working under the auspices of OHS18001 Occupational Health Management System which, as with all quality-based management systems, is continually revised.

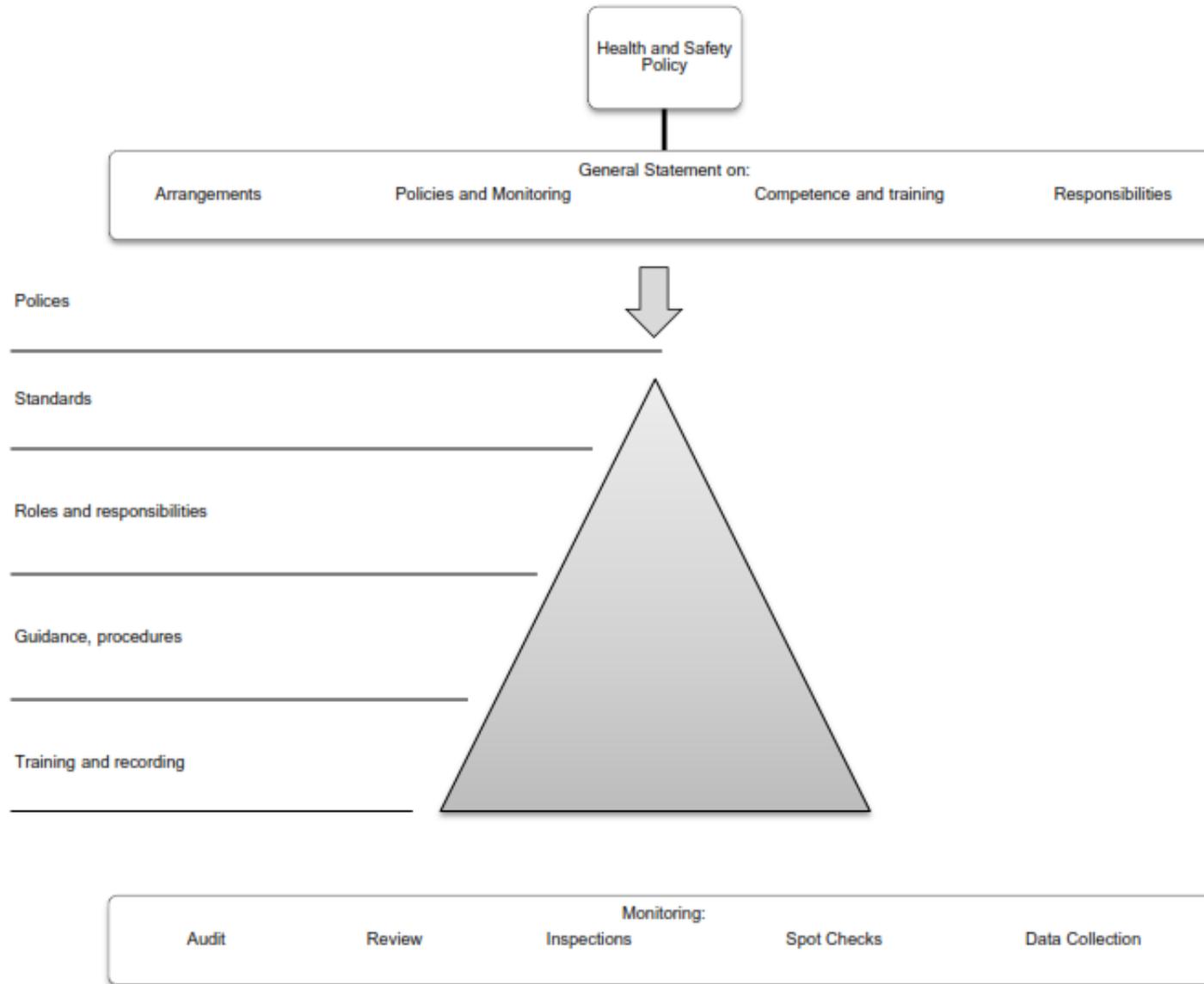
Appendix 2 - Simplified Diagram of Health and Safety Management System

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watkins



Watkins M&E Group Ltd.
(Head Office)
Leigh Road, Haine Industrial
Park
Ramsgate
Kent CT12 5EU

t: 01834 852277

f: 01834 852202

www.watkins-group.co.uk