



HEALTH & SAFETY POLICY STATEMENT

GEOFFREY OSBORNE LIMITED, SUBSIDIARY COMPANIES AND DIVISIONS

1. INTRODUCTION

Section 2(3) of the Health and Safety at Work etc. Act 1974, requires each Company to prepare and, when appropriate, to revise a written statement of general policy with respect to the health and safety at work of its employees, and the organisation or arrangements in force for carrying out the Policy, and to bring the Policy Statement to the notice of all employees. This document contains the Policy Statement of Geoffrey Osborne Limited, and applies to all Subsidiary Companies and Divisions.

2. GENERAL STATEMENT

- a) It is the Policy of this Company to perform work in the safest practicable manner, consistent with good practice. The Company is also committed to continuously improve health and safety throughout our activities. The health and safety of the Company's employees, all those likely to be affected by our operations and the protection of Company assets is the responsibility of the management; Health & Safety is paramount.
- b) It is the duty of the management to do everything reasonably practicable to prevent injury and ill health, and it is equally the duty of each employee to exercise personal responsibility for their own Health & Safety and that of others.

This is required by law.

- c) All employees should be aware that there is no conflict between Health & Safety and production.
- d) It is the Policy of the Company to adhere completely to the requirements of the Health and Safety at Work etc Act 1974 and all Acts, Regulations and Codes of Practice made under the Acts that affect our operations. The Company consider HSE Guidance to be the **minimum standard** applied to all operations and locations.
- e) The attention of all personnel joining the Company is directed to this Health & Safety Policy, its Appendices and the Health & Safety Management System, which is explained during regular Group Health & Safety Induction courses. The Health & Safety Policy is displayed at all locations and issued to all Supervisors within the Company Safety Matters Folder.

3. RESPONSIBILITY

- a) Responsibility for health and safety on site and elsewhere is delegated to line supervision in accordance with the usual chain of responsibility. The most Senior Manager on site is responsible for the safe conduct of work on site, **this responsibility cannot be delegated to others.**

Health & Safety on smaller contracts, which do not have a Resident Manager, is the responsibility of the visiting Supervisor.

- b) Where difficulties arise in the maintenance of safe working practices or conditions, reference must be made to the appropriate Company / Divisional Managing Director. These are as follows :

CIVIL ENGINEERING DIVISION	: J W CRANE
CONSTRUCTION DIVISION	: P SHORTMAN
HOMES DIVISION	: P HEAD
INNOVARE SYSTEMS LIMITED/IS MANUFACTURING LIMITED	: A ORRISS
PROPERTY SERVICES	: T DAVIES
RAIL DIVISION	: M COCKS

They have responsibility for ensuring that sufficient authority is given to enable safe practices and conditions to be maintained.

- c) Ultimate responsibility rests with the Board of Directors. The Executive Director, **MR ANDREW OSBORNE**, is responsible to the Board for all health and safety matters. Health & Safety Responsibility Statements for management are set out in Appendix A to this Policy Statement.

4. HEALTH AND SAFETY ADVICE

- a) Regulation 7 (1) of the Management of Health and Safety at Work Regulations 1999 requires the appointment of competent persons to assist in evaluating the risks associated with the Company's activities. The Health & Safety Team, under the management of **Mr. P. W. ROBERTSHAW**, Director of Safety, is appointed to fulfil these statutory requirements on behalf of the Group of Companies.
- b) The Director of Safety's advice on all health and safety matters may be sought by all employees, through the usual channels. Qualified Safety Advisers make regular safety audits of our sites and leave reports on site.

Copies of these reports are forwarded to Divisional Offices, and it is the Policy of the Company that all items raised on the reports should be corrected in accordance with the Safety Advisers instructions.

- c) Any employee who is in doubt about safe working practices, procedures and conditions should contact their immediate supervisor and when necessary stop work.

5. CONSULTATION

- a) **Trade Unions.** Any arrangements negotiated between the Company and recognised independent Trades Unions regarding Health & Safety Representatives and/or Health & Safety Committees will be added in the form of an Appendix to this Health & Safety Policy.
- b) **Employee Consultation.** Suggestions or comments on ways in which our health and safety performance can be improved are actively encouraged, and all suggestions will be considered at the regular Operational Safety Group meetings. Regular on site Toolbox Training Sessions are carried out to encourage both sub-contractor and employee consultation on health & safety matters; issues raised at such meetings are brought to the attention of the Operational Safety Group by the appropriate Subsidiary Company or Divisional representative.

Detailed arrangements for employee consultation are contained in the Health & Safety Management System.

6. HEALTH & SAFETY POLICY REVIEW

- a) The Health and Safety at Work etc Act 1974 requires the Company to monitor the effectiveness of this Policy in terms of the use made of it by both management and work forces. Review of the Health & Safety performance of the Company and the functioning of the Policy is the task of the Board of Directors, on whose Agenda this will be a regular item. Annually the Director Of Safety will review the content of this Policy and present to the Group Board of Directors ways in which the Company's Health & Safety performance may be improved.
- b) In addition, health, safety and welfare will also be discussed at site meetings, at which subcontractors' representatives may be asked to be present for discussions on their Health & Safety Policies, working practices, health & safety performance and other related matters. Details of the monitoring and auditing arrangements for the Company Health & Safety Policy are contained in the Health & Safety Management System.
- c) Regularly, statistics will be presented by the Director of Safety, giving details of accidents, incidence of ill-health, damage to assets, near misses and dangerous occurrences, to the Group Board of Directors and senior managers. The content of the report will be discussed and objectives determined in order to formulate, or amend (as appropriate), the Osborne Health and Safety Charter, as presented by the Director of Safety to the Group Board of Directors each year.

7. TRAINING

The Health & Safety training policy is detailed in the Health & Safety Management System.

8. ACCIDENT REPORTING

Geoffrey Osborne Limited will comply with the requirements of RIDDOR 1995. Full details of documentation and reporting of occurrences are contained in the Health & Safety Management System.

9. FIRST-AID FACILITIES

- a) To comply with the Health and Safety (First-Aid) Regulations 1981, adequate first-aid equipment and facilities are located at sites, offices and other premises. The person in charge at each place of work is designated as the 'responsible person' for the purposes of these Regulations, and that person's name and normal work location will be displayed at each place of work. Details for organisation of first aid facilities are contained in the Health & Safety Management System.
- b) **The names of those persons trained in First-Aid will be displayed on each site or within each premises.**

10. COMPANY HEALTH & SAFETY RULES

- a) Statutory requirements are viewed by the Company as being the **minimum acceptable standards**, rather than the ideal maximum. In addition to statutory requirements, the Company Health & Safety Rules must be strictly adhered to by all employees regardless of the nature of their specific duties. Disregard by an employee of any Company Health & Safety Rule shall render an individual liable under the Company's Disciplinary Procedure.

The Company Health & Safety Rules are detailed in the Health & Safety Management System.

11. HEALTH & SAFETY SUPERVISORS

The most Senior Manager on site, or visiting supervisor, is empowered by the Group Board of Directors to ensure the intent and requirements of this Policy are maintained throughout each project. They receive the appropriate health & safety training required to fulfil this role.

12. SUBCONTRACTORS

- a) All subcontractors are bound by the health & safety requirements attached to each subcontract, which includes this Company Health & Safety Policy. They shall comply with, and make this Policy known to all their employees working on the Company's projects.
- b) The Company will require a copy of the Health & Safety Policy Statement of each subcontractor to be provided for record purposes.

13. HAZARDS (RISK ASSESSMENTS)

- a) **The Company is required by the Management of Health and Safety at Work Regulations 1999 to assess significant risks associated with its operations.** There are a number of special hazards which present significant risks which could occur during the Company's activities. Although generic details are given within the Health & Safety Management System, the general procedures given in the next two paragraphs will be followed in each case.
- b) Prior to the commencement of works the Company/Divisional Managing Director is responsible for ensuring that a competent person has evaluated the operations involved and identified the hazardous activities and their associated significant risks. From this evaluation process suitable physical and documented controls will be identified and introduced into the requirements of the project in order to eliminated, or reduce to an acceptable level, the risks presented. This evaluation process will be formally drawn up in a Construction Phase Plan, which will be maintained and continually audited by the Site Management in order to ensure it remains relevant as works progress.
- c) Site Management will constantly monitor the prevailing conditions on site in order to ensure the controls identified in the Construction Phase Plan are maintained. Where on site activities may cause hazards not foreseen within the Construction Phase Plan the site management will assess the risks presented by these hazards and determine appropriate controls to be adopted in order to eliminate or reduce, to an acceptable level, those risks. These additional risk assessments will be documented as the work proceeds.

The foregoing is the Health & Safety Policy Statement of Geoffrey Osborne Limited, Subsidiary Companies and Divisions on the health and safety at work of all employees and self employed or sub contractors under the control of the Company. It has been prepared after due consultation with those involved in its operation, and has the full backing and authority of the Board of Directors.

Signed.....

Mark Heasman
Chief Executive Officer
31 March 2008

LIST OF APPENDICES

A. Health & Safety Responsibility Statements

HEALTH & SAFETY POLICY - APPENDIX A

This Appendix to the Health & Safety Policy details the responsibilities for Health & Safety at all levels of employee. In all cases where responsibility is felt to be unclear, the advice of a member of senior management must be obtained.

a) MR A OSBORNE (Director with responsibility for health and safety) will:

- i) initiate, administer and interpret the effective implementation of the Health and Safety Policy;
- ii) have an understanding of the application of the Health and Safety at Work etc Act 1974 and this Health & Safety policy to the Company's operations, and a general knowledge of Regulations relevant to Construction Operations and other relevant Regulations and Codes of Practice;
- iii) ensure that funds and facilities are available to meet the requirements of the Policy;
- iv) promote the safe conduct of work generally;
- v) reprimand any member of staff failing to discharge their Health & Safety responsibilities correctly;
- vi) set a personal example.

b) MR P W ROBERTSHAW (Director of Safety):

- i) Is a chartered Health and Safety Practitioner (CFIOSH), with in excess of 15 years experience of managing Health & Safety at a senior level in the construction industry;
- ii) will manage and supervise all aspects of the Company's (and its subsidiaries') Health & Safety requirements, to ensure that throughout our activities Health & Safety is given primary importance and the requirements of the Health & Safety Policy and current legislation are maintained;
- iii) has the authority of the Group Board of Directors to stop any activity if he considers:
 - a) there to be a risk of injury or
 - b) it seriously infringes Health & Safety legislation.

This authority also applies to the Company's subcontractors and other personnel not directly employed by the Company but on a site which remains in our control;

- iv) will set a personal example.

c) Company/Divisional Managing Directors will:

- i) ensure that training is arranged by the Group Training & Development Manager for all levels of management and employees, and that records of employees' training are maintained;
- ii) notify the Health & Safety Team of all new work.
- iii) co-ordinate Health & Safety information and disseminate such information throughout the Company/Division;
- iv) have an understanding of the application of the Health and Safety at Work etc Act 1974 and this Health & Safety policy to the Company's operations, and a general knowledge of Regulations relevant to Construction Operations and other relevant Regulations and Codes of Practice;

- v) reprimand and if necessary instigate Disciplinary Procedures if any member of staff fails to discharge their Health & Safety responsibilities correctly;
- vi) liaise with the Director of Safety to ensure the proper reporting, investigation and analysis of accidents and/or dangerous occurrences, to be aware of changes in legislation which affect the Division and to promote the safe conduct of work generally;
- vii) monitor site Health & Safety report trends and ensure that unsatisfactory conditions not previously actioned are corrected;
- viii) ensure that budgets and tenders are adequate to cover sound methods of working, and the provision of the required welfare facilities;
- ix) ensure that Construction Phase Plans are produced to cover all works carried out on every project, and to monitor compliance as the work proceeds;
- x) set a personal example.

d) Contracts Managers will:

- i) Understand the responsibility for health and safety allocated to each grade of employee;
- ii) have knowledge of the application of the Health and Safety at Work etc Act 1974 and this Health & Safety policy to the Company's operations, and a good knowledge of Regulations relevant to Construction Operations and other relevant Regulations and Codes of Practice;
- iii) monitor site Health & Safety reports, and ensure that unsatisfactory conditions not previously actioned are corrected immediately;
- iv) ensure that sound methods of working and the required welfare facilities are maintained on their sites;
- v) determine at the project planning stage:
 - a) the most appropriate order and method of working;
 - b) the provision of welfare and sanitation facilities;
 - c) hazards which might arise from overhead or underground services;
 - d) allocation of Health & Safety responsibilities with subcontractors and others;
 - e) that the requirements of the Company Site Fire Procedures are adhered to on all sites and adequate first-aid facilities are provided;
- i) decide working methods and precautions with site management and subcontractors before work starts;
- ii) act on the recommendations of the Safety Advisers, putting their reports into effect;
- iii) ensure site management maintain the Construction Phase Plan and countersign it during their visits;
- iv) ensure site management carry out Health & Safety self audits on their sites at the appropriate intervals and sign them to confirm.
- v) set a personal example.

e) Site Managers will:

- i) organise sites so that work is carried out to the required standard of Health & Safety with minimum risk to persons, equipment and materials. Where complex procedures are involved, they will issue method statements in written form;
- ii) have an understanding of the application of the Health and Safety at Work etc Act 1974 and this Health & Safety policy to the Company's operations, and a good knowledge of Regulations relevant to Construction Operations and other relevant Regulations and Codes of Practice;
- iii) ensure that hazards from material stacking, positioning of plant and installations of electricity supply are eliminated;
- iv) plan and maintain a tidy site;
- v) ensure that safe working methods are maintained and see that they do not require or allow persons to take unnecessary risks;
- vi) make sure that suitable protective clothing is available where appropriate and that it is used;
- vii) ensure that all machinery and plant, including power and hand tools, is maintained in good condition and has the necessary current test certificates.
- viii) ensure that site fire procedures are written for each site, and act as fire co-ordinator for the site;
- ix) ensure that adequate first-aid facilities are established and are available;
- x) co-operate with the visiting Safety Adviser acting promptly on their recommendations, and accompany H.S.E. Inspector's on their site visits;
- xi) review work hazards and methods with new or transferred employees;
- xii) ensure that statutory notices are displayed, and that statutory inspection reports are being maintained up to date;
- xiii) maintain the Construction Phase Plan;
- xiv) carry out daily checks on site and a weekly Health & Safety audit of the site, which must be documented;
- xv) set a personal example.

f) Foremen will :

- i) have an understanding of the application of the Health and Safety at Work etc Act 1974 and this Health & Safety policy to the Company's operations, and a general knowledge of Regulations relevant to Construction Operations and other relevant Regulations and Codes of Practice;
- ii) ensure that work under their control is carried out safely, without risks to health and in accordance with all site Health & Safety method instructions and procedures;
- iii) ensure that safe practices are established before work starts, and that these practices are maintained;
- iv) assist the Site Manager to comply with the requirements of the Policy;
- v) check that the correct tools and equipment, including Health & Safety equipment and protective clothing, are available, operatives received adequate instruction in its use, and are correctly used;

- vi) ensure tools are kept in good condition;
- vii) instruct new employees on the conditions of the site and possible hazards;
- viii) set a personal example.

g) Operatives will:

- i) use the correct tools and equipment for the job, including Health & Safety equipment and protective clothing;
- ii) keep tools in good condition;
- iii) report to supervision defects in plant or equipment;
- iv) develop a personal concern for health & safety for themselves and for others, particularly the inexperienced, employees and young people;
- v) avoid unconventional methods if the risks are too high;
- vi) instruct new employees on conditions of the site and possible hazards;
- vii) refrain from rowdy behaviour and take care of the welfare facilities;
- viii) report incidents which have led or may lead to injury; co-operate in the investigation of accidents and suggest ways of eliminating hazards;
- ix) understand the requirements of the Health & Safety Policy;
- x) set a personal example.

h) Safety Managers and Advisors will:

- i) be competent in matters relating to health, safety and welfare throughout their areas of responsibility;
- ii) be professionally qualified, or on a development programme to obtain professional qualifications within a suitable timescale
- iii) provide advice and guidance to all Company employees, sub-contractors and the self-employed on matters relating to health, safety and welfare;
- iv) have the authority of the Director of Safety to stop any activity liable to cause a fatality, injury or is a breach of statute;
- v) set a personal example

REMINDER:

Disregarding the Company's Health & Safety rules will result in Disciplinary Procedure.