

MWH Treatment

HEALTH AND SAFETY POLICY MANUAL

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Review	Revision 5 May 2024	Simon Cox SHEQ Director	Paul Bresnan Chief Executive
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<i>Issue / amendment details</i>	<i>Reviewed by</i>	<i>Authorised by</i>
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NOTE:

1. This Manual may be revised from time to time. The current issue is available on company intranet and IFS.
2. This manual is the property of MWH Treatment Limited and is confidential. It must not be copied or lent to a third party without prior permission from a SHEQ Manager or a Director.

REVISION HISTORY

Revision	Date	Amendments / Comments
1	June 2015	First Issue – Complete revision of previous H&S Policy Manual HSM 001 and HSP (Asset Management Health and Safety Policy Manual).
2	Feb 2019	General revision in line with changes from 3 Districts to Water and Waste to Energy Divisions. Updated for rebranding (MWH) and review.
3	Feb 2021	Updated to reflect appointment of Chief Executive and SHEQ Director. Updated to align with ISO 45001 requirements. Removed detailed responsibilities section and added links to HSGD36 guidance notes.
4	March 2024	Full review. Updated management structure and meeting structure. Added Wellbeing.
5	May 2024	Amended that Site Safety and Environmental Supervisors (SSEs) are to be appointed by Framework Directors at the delegation of the Chief Executive.

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Abbreviations and Definitions

ACMs	Asbestos Containing Materials
BSC	British Safety Council
Competent Person	A competent person is defined as somebody with the skill, knowledge, practical experience and training to enable them to assess the risks arising from work activities.
Designers	Those who have a trade or a business which involves them in: <ul style="list-style-type: none"> (a) Preparing designs for construction work, including variations. This includes preparing drawings, design details, specifications, bills of quantities and the specification (or prohibition) of articles and substances, as well as all the related analysis, calculations, and preparatory work; or (b) Arranging for their employees or other people under their control to prepare designs relating to a structure or part of a structure.
Employees	For the purpose of this manual this includes all employees, agency staff and sub-contracted staff.
IFS	The company's Enterprise Management Information System
IMS	Integrated Management System
HAV	Hand Arm Vibration
H&S	Health and Safety
HSE	Health and Safety Executive
HSFR	Health and Safety Form
HSGD	Health and Safety Guidance Document
HSPD	Health and Safety Process Diagram
HSMA	Health and Safety Policy Manual
HSW	Health, Safety and Wellbeing
Company Intranet	MWH Treatment company intranet
MWH Treatment	MWH Treatment Ltd
SHEQ Director	Director of Safety, Health, Environment and Quality
ISO 45001	Occupational Health and Safety Standard
Chief Executive	The senior management representative with responsibility for Health and Safety
ORR	Occupational Road Risk
PPE	Personal Protective Equipment
Responsible Manager	Is any manager who is directly responsible for other employee(s)
RoSPA	Royal Society for the Prevention of Accidents
RTI	Road Traffic Incidents
SHEQ	Safety, Health, Environment and Quality
SLG	Senior Leadership Group
SSoW	Safe Systems of Work
WBV	Whole Body Vibration

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CONTENTS

1	INTRODUCTION	5
1.1	Scope	5
1.2	Issue and Change Control	6
1.3	Review	6
1.4	References	6
1.5	Nominated Safety Representatives – MWH Treatment	6
1.6	External Safety Advisors	6
2	Health, Safety and Wellbeing Policy	7
3	ORGANISATION	9
3.1	Organisation	9
3.1.1	Company H&S	9
3.1.2	Site Safety	9
3.1.3	Health and Safety Assistance	9
3.1.4	Site Safety and Environmental Supervisors	10
3.1.5	Office Safety	10
3.1.6	Employees	10
3.2	Responsibilities	10
3.3	Management Structure	12
3.3.1	Senior Leadership Group (SLG)	12
3.3.2	SHEQ SLG	12
3.3.3	Regional and Departmental Management Teams	12
3.3.4	SHEQ Managers Meeting	13
3.3.5	Consultation Committees	13
4	H&S MANAGEMENT SYSTEM	15
4.1	General	15
4.2	Health, Safety and Wellbeing Policy	16
4.3	Planning	16
4.3.1	Hazard Identification, Risk Assessment and Determining Controls	16
4.3.2	Legal and other requirements	16
4.3.3	Objectives and Programmes	16
4.4	Implementation and Operation	17
4.4.1	Resources, Roles, Responsibility and Authority	17
4.4.2	Competence, Awareness and Training	17
4.4.3	Communication, Participation and Consultation	18
4.4.4	Documentation	19
4.4.5	Implementation	19
4.4.6	Control of Documents	20
4.4.7	Operational Control	20
4.4.8	Emergency preparedness and response	26
4.5	Checking	26
4.5.1	Monitoring and Measurement	26
4.5.2	Evaluation of compliance	27
4.5.3	Incident investigation, non-conformity, corrective and preventive action	27
4.5.4	Control of records	28
4.5.5	Internal audit	29
4.6	Management review	29
	Appendix 1: MWH Treatment Organisational Chart	30

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1 INTRODUCTION

1.1 Scope

MWH Treatment is a water sector leading solution provider with a 200 year legacy behind us. As a responsible business our focus is on safe delivery of sustainable solutions with enhanced resilience and maximum positive impact on the environment and the communities we serve and live in.

We operate across the UK water industry with over 1300 process intelligent, multi-disciplined, engineering, procurement, delivery and commissioning professionals. Our teams are co-located across nine major Frameworks, including integrated Joint Ventures and Alliances, supported by our Manchester based support services centre.

Our truly integrated design delivery culture provides a complete range of end to end services for all water and wastewater solutions from major programmes and projects through to minor capital delivery maintenance, process optimisation and operations.

For more details on MWH Treatment see [About Us - | MWH Treatment](#).

This Health, Safety and Wellbeing policy manual defines the Health, Safety and Wellbeing policy, arrangements, organisation and responsibilities for MWH Treatment. It describes the key elements of the Health, Safety and Wellbeing Management System that MWH Treatment has in place to satisfy its moral, legal, business and ISO 45001 requirements for the following scope of works:

Activities including and associated with project management, design, procurement, construction and commissioning of projects; asset management and facilities management, surveying and geographic information; leakage, water and waste water management, typically for the water sector.

Joint ventures and overseas projects may operate to ISO 45001 where specified but will, as a minimum, implement systems to prevent incidents and comply with all relevant statutory requirements.

The scope of the system that is applied to each of MWH Treatment's Joint Ventures, Alliance Partners or Business Areas can be seen in MWH Treatment IMS Scope ([SYRE/1646055](#)).

Where there is a contractual requirement to work to and adopt the client's H&S policies and procedures, then they shall take precedence, providing they do not jeopardise the health, safety and welfare of our employees.

This H&S policy manual is intended to provide employees, clients, joint venture partners and others, with an explanation of the Health, Safety and Welfare arrangements operated by MWH Treatment. This policy applies to all persons under our control (i.e. employees, agency staff, visitors and sub-contractors).

The H&S policy manual is the first tier document for the purposes of managing health, safety and welfare within MWH Treatment. It is supported by Company SHEQ Processes and Procedures and other associated IMS documentation.

MWH Treatment employees are required to implement the health, safety and welfare policy through adherence to the principles and practices defined by this H&S policy manual and supporting IMS documentation.

1.2 Issue and Change Control

The HSW policy manual is prepared by the SHEQ Department on behalf of the Chief Executive with assistance from others as required. It is authorised for use by the Chief Executive.

Controlled copies of this document are not issued. The document is held on the company intranet and IFS and is available to Company employees for use.

This manual is the property of MWH Treatment and is confidential. It must not be copied or lent to a third party without prior permission from a SHEQ Manager or Director. Where copies of the Manual are made available to a client, or others, it is with this proviso.

1.3 Review

This Manual will be revised as and when necessary and re-authorised by the Chief Executive prior to re-issue. Comments should be submitted to the SHEQ Director. Each revision is valid from the date of issue.

1.4 References

Where reference is made to H&S regulations, statutory provisions, guidance and standards in this Manual, it shall be taken that this applies to the latest version of legislation or document e.g.

- Health and Safety at Work etc. Act 1974
- Management of Health and Safety at Work Regulations 1999
- Consultation with Employees Regulations 1996
- HSE publication: HSG 65 - "Managing for Health and Safety"
- ISO 45001:2018

1.5 Nominated Safety Representatives – MWH Treatment

Title	Name	Responsibility
Chief Executive	P Bresnan	Executive responsibility within MWH Treatment. Overall responsibility for Health, Safety and Wellbeing policy within MWH Treatment and responsible for implementation of HSW policy.
SHEQ Director	S Cox	Overall responsibility for ensuring compliance with the company HSW policy and legislative requirements for all sites and offices.

1.6 External Safety Advisors

None

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2 HEALTH, SAFETY AND WELLBEING POLICY

The latest revision of the MP03 MWH Treatment Health, Safety and Wellbeing Policy is available to all employees via IFS, company intranet, on office notice boards, the digital site noticeboard and on the company's external website.

Other [policy statements](#) and statements of intent have been implemented to raise awareness and include but are not limited to:

- MP18 Drugs and Alcohol Policy
- MP79 Smokefree Policy
- MP91 Fatigue Management Policy
- MP92 Stress Management Policy
- MP99 Electrical Safety Policy Statement

Other policy statements will be raised as required or included in the relevant IMS procedure.

The policies are reviewed on a regular basis during SHEQ annual review or as required due to changes in operations or Legal requirements to ensure that they remain relevant and appropriate to MWH Treatment.

Senior management demonstrate their commitment to the policy through:

- Publication of the Policy.
- Setting objectives and targets.
- Providing adequate resources for the development and implementation of the IMS, training and to achieve improvement.
- Carrying out management reviews to monitor the effectiveness and performance of the IMS.
- Completing Senior Management Tours to monitor the effectiveness and performance of the IMS and to engage the workforce.
- Communicating the importance of the meeting our HSW objectives as well as complying with statutory requirements.

This policy applies to all persons under our control (e.g. employees, agency staff, visitors and sub-contractors). MWH Treatment will ensure that all employees are responsible for their own health, safety and wellbeing, and that they do not endanger others, for example colleagues, other contractors, visitors, client's employees and the public.

The consequence of failure to do this could result in the following:

- Death, injury or illness
- Breach in regulations leading to prohibition or improvement notices
- Prosecution
- Heavy fines on conviction with imprisonment for certain offences
- Increased liability and insurance costs
- Delayed progress of work and additional costs due to inefficiencies
- Poor employee satisfaction within the organisation
- Lack of continual work due to client project cancellations
- Poor public relations
- Lack of customer confidence

No employee or person shall recklessly or wilfully interfere with anything provided for health, safety and wellbeing. Any breach of the HSW policy will result in disciplinary action as defined in the company's employee handbook.

Every employee and persons under MWH Treatment control has the right to refuse to undertake a task if they feel their health, safety or welfare may be jeopardised. Moreover, employees are encouraged to raise their concerns in an open and cooperative manner. MWH Treatment will not censure or act in a prejudicial manner towards any employee who raises a legitimate health and safety concern.

The company will maintain insurance to meet its legal and contractual requirements. Insurance is arranged by MWH Treatment for all subsidiary companies. The company will check on a regular basis that its activities are covered by the policy.

3 ORGANISATION

3.1 Organisation

MWH Treatment's is part of the RSK Group Limited but operates on an autonomous basis within the guidelines of corporate policy.

The organisation and reporting structure for HSW management in MWH Treatment is described below and illustrated by the organisation chart in appendix 1. The personnel appointed to have specific responsibility for H&S management are nominated in section 3.2 below.

3.1.1 Company H&S

The Chief Executive has executive responsibility for HSW within MWH Treatment and is the person to whom reference should ultimately be made in the event of difficulty arising from the implementation of this policy manual.

The Chief Executive reports directly to the RSK Group President. The Chief Executive has been appointed as the person having particular responsibility for the day-to-day implementation of the HSW policy within MWH Treatment.

The Chief Executive may delegate the responsibility for management of specific aspects of the HSW policy within the company to personnel having the necessary competence and authority to ensure that the policy is implemented. The specific areas of delegation will be:

- Site safety
- Regional office safety
- Equipment safety

Directors and Managers will be responsible for the day-to-day implementation, maintenance and control of safe working practices within their area of responsibility. Refer to section 3.2 Responsibilities.

3.1.2 Site Safety

The responsibility for implementing the HSW policy on individual sites is delegated to the relevant Site Manager.

3.1.3 Health and Safety Assistance

MWH Treatment have appointed a SHEQ Director who reports directly to the Chief Executive. The SHEQ Director has overall responsibility for co-ordinating the management of health, safety and welfare relating to office and site-based operations including those of subcontractors.

The SHEQ Director is also responsible for the maintenance of the HSW management system and its associated documentation.

The SHEQ Director is supported by a team of SHEQ professionals in the roles of SHEQ, HSW Managers and Advisors who report directly to him.

The SHEQ / HSW Managers and Advisors operate in an advisory role in assisting management with the implementing of the HSW policy.

HSW Managers and Advisors are responsible for ensuring that the HSW policy is operated in the company premises and site work locations. This is done through the performance of routine audits and inspections, the results of which are reported to the relevant Manager or Director for action.

3.1.4 Site Safety and Environmental Supervisors

The Chief Executive shall delegate to the Framework Director to appoint a suitable person as Site Safety and Environmental Supervisor, normally the Site Manager. The appointed Site Safety and Environmental Supervisor is responsible for monitoring the implementation of safe working practices and for maintaining compliance with legislative requirements on the site.

3.1.5 Office Safety

The Chief Executive shall appoint a suitable person as Office Manager responsible for each regional office. The appointed person is responsible for monitoring the implementation of safe working practices at that office.

3.1.6 Employees

All employees have a responsibility for their own safety and that of others, and have a duty to carry out their work in a safe and competent manner which will not endanger themselves or others by their acts or omissions.

Employees must comply with all relevant health, safety and welfare instructions and procedures. They must report any unsafe working practice, condition or equipment through the appropriate channels.

3.2 Responsibilities

This section gives a brief description of responsibilities for those employees appointed for the daily management and performance of work activities which could affect the health, safety and wellbeing of themselves or others.

The Chief Executive of MWH Treatment has overall responsibility for the HSW policy and performance of MWH Treatment and is responsible for:

- Ensuring that full commitment is given to implementation of policies.
- Administering the policy throughout the company by appointing a SHEQ Director to be responsible for its implementation.
- Allowing adequate resources, including human, specialised skills, organisational infrastructure, technological and financial, for implementation of the policy to ISO 45001 standard.

All appointed directors, managers, advisors, designers, supervisors etc. are accountable through the MWH Treatment recognised chain of line management to the Chief Executive for implementing the relevant requirements of this policy within their area of responsibility.

All directors, managers and employees have responsibilities under the Health and Safety at Work etc. Act 1974. Notwithstanding employees job descriptions, contracts or terms and conditions, their general SHEQ responsibilities are outlined in the documents detailed below.

IMS Procedure HSPR36 Organisation and guidance documents (HSGD's) explain in greater detail individual SHEQ responsibilities and can be found on Company Intranet [here](#).

Job Role	Health and Safety Responsibilities Guidance
All Employees	HSGD36-01 All Employees Responsibilities
Chief Executive and Directors	HSGD36-02 Director Responsibilities
SHEQ Director	HSGD36-30 SHEQ Director Responsibilities
All Managers (e.g. Regional Business Managers, Operations, Project and Departmental Managers)	HSGD36-23 Managers Responsibilities
Operations and Project Managers (Asset Management)	HSGD36-35 Operations and Project Managers (Asset Management) Responsibilities
Regional Health and Safety / SHEQ Managers	HSGD36-06 Health and Safety Manager Responsibilities
National Environment and Sustainability Manager Responsibilities	HSGD36-33 National Environment and Sustainability Manager Responsibilities
National Quality Manager Responsibilities	HSGD36-38 National Quality Manager Responsibilities
Health and Safety Advisors	HSGD36-28 Health and Safety Advisors Responsibilities
Environmental / Senior Environmental Advisors	HSGD36-34 Environmental / Senior Environmental Advisors Responsibilities
SHEQ Internal Auditors	HSGD36-31 SHEQ Internal Auditors Responsibilities
Facility Managers (office related premises)	HSGD36-09 Facility Management (office related premises) Responsibilities
Construction Managers / Supervisors	HSGD36-10 Construction Manager / Supervisors Responsibilities
Estimators / Proposals Engineers and Managers / Quantity Surveyors	HSGD36-11 Estimators / Proposals Engineers / Quantity Surveyors Responsibilities
Procurement Managers / Supervisors	HSGD36-12 Procurement Managers / Supervisors Responsibilities
CDM - Contractors	HSGD36-13 Contractor Duties
CDM - Designer	HSGD36-14 Designer Duties
CDM – Principal Designer	HSGD36-15 Principal Designer Duties
CDM – Client	HSGD36-16 Client Duties
CDM – Principal Contractor	HSGD36-17 Principal Contractor Responsibilities
Temporary Works Coordinators	HSGD36-07 Temporary Works Co-Ordinator Responsibilities
Temporary Works Supervisors	HSGD36-18 Temporary Works Supervisor Responsibilities
Lifting Appointed Persons	HSGD36-19 Lifting Appointed Persons Responsibilities

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Crane Supervisor	HSGD36-20 Crane Supervisor Responsibilities
Lifting Equipment Operator	HSGD36-21 Lifting Equipment Operator Responsibilities
Fire Warden / Marshal	HSGD36-22 Fire Warden / Marshal Responsibilities
Slinger	HSGD36-24 Slinger Responsibilities
First Aider	HSGD36-25 First Aider Responsibilities
Signaller	HSGD36-26 Signaller Responsibilities
Inspection, Test and Commissioning Engineers	HSGD36-32 Inspection, Test and Commissioning Engineers Responsibilities
Field Survey Staff (Leakage and Networks / Survey Services)	HSGD36-39 Field Survey Staff (Leakage and Networks / Survey Services) Responsibilities
Process Owners	HSGD36-40 Process Owners Responsibilities
DSEAR Responsible Designer	HSGD36-41 DSEAR Responsible Designer
DSEAR Responsible Person	HSGD36-42 DSEAR Responsible Person
Water Quality Champion	HSGD36-44 Water Quality Champion Responsibilities

3.3 Management Structure

Management of the HSW Policy / Manual is directed by means of the structure as seen in appendix 1. The SHEQ meeting structure is defined in [BPPD04-01 Management Meetings](#) and outlined below.

3.3.1 Senior Leadership Group (SLG)

The SLG is responsible for setting the Company's policy statements, overall SHEQ objectives in line with the strategic plan and for carrying out a high-level review of the performance and effectiveness of the IMS. The SLG is made up of senior management including the Chief Executive, Operations Director, Engineering Director and Finance Director and SHEQ Director.

3.3.2 SHEQ SLG

During the monthly SHEQ SLG meeting, the SHEQ Director and Head of SHEQ are responsible for reviewing the Company policy, objectives and targets in line with the strategy set out with the SLG. It will review any incidents and learning from the Company and agree changes to the IMS.

3.3.3 Regional and Departmental Management Teams

The Management team are responsible for reviewing HSW performance, including incidents and audit findings on a monthly basis for their area of responsibility.

Management Teams are responsible for endorsing the implementation of HSW improvements and allocation of resources.

3.3.4 SHEQ Managers Meeting

The meeting consists of the SHEQ Director and Heads of SHEQ. H&S Advisors and other personnel may be invited to attend meetings where required. The function of this committee is to promote continual improvement and cooperation between the Frameworks within MWHT by reviewing the implementation and operation of the IMS, incidents, sharing best practice and lessons learned. The H&S Managers meet regularly, usually every two weeks, to share incidents, near misses, significant audit findings, legislation updates, SHEQ training requirements, non-conformances and corrective actions, share best practice and lessons learned and suggest improvements to the IMS. Every 3 months the committee meets formally and will identify any changes required to the:

- IMS including this HSW Manual
- HSW Objectives
- Relevant Stakeholder obligations
- Needs and expectations of interested parties
- Any other identified areas for improvement

The team utilises feedback on safety performance from the Health and Safety Advisors, employees, subcontractors, clients, the Health and Safety Executive and other parties as appropriate. Where problems are identified, suitable corrective actions are initiated and monitored to verify that they have achieved the desired effect.

Minutes / Actions of the 3 monthly meetings are recorded.

3.3.5 Consultation Committees

Consultation committees have been established to provide a mechanism to allow employees an opportunity to give feedback, including on HSW matters, policy and procedures.

These committees shall comprise:

- SHEQ Conference Calls (Bi-monthly)
- Regional Operations Committees (meets monthly) comprises of Project Managers / Site Managers and other staff as appropriate involved with engineering and construction.
- Site HSW Meetings – Daily and Monthly where all workers can provide feedback

Meetings will be held more frequently when issues need to be raised that cannot be resolved through the current meeting structures. All employees also have the right to have issues raised at their regional operations committee or, by prior arrangement, address the committee personally. They may also raise any issues on the SHEQ Conference Call, either anonymously through Sli.do, in person, or by email to the SHEQ team afterwards.

The objective of these committees / meetings is to proactively promote the consultation and participation of non-managerial workers in instigating, developing, implementing and promoting health, safety and wellbeing at work.

A podcast of the SHEQ conference call will be posted on Company Intranet and by email to all employees.

SHEQ Monthly Meeting Minutes will be posted on the site noticeboard (or digital site noticeboard) for all employees and subcontractors to review.

Where problems are identified, suitable corrective actions are initiated and monitored to verify that they have achieved the desired effect.

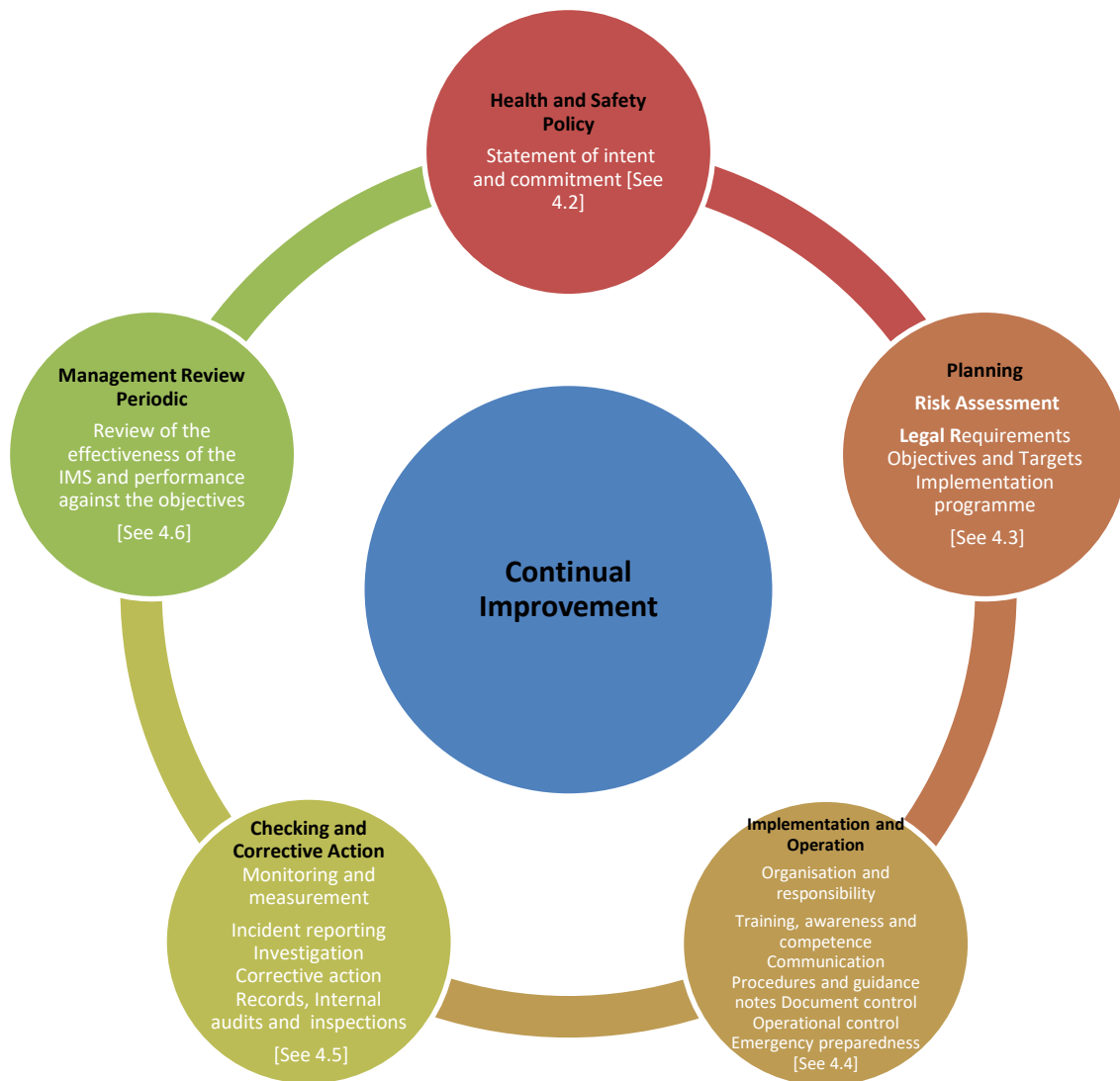
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4 H&S MANAGEMENT SYSTEM

4.1 General

The Health, Safety and Wellbeing Management System (IMS) has been developed in conjunction with the quality and environmental management systems, to comply with the requirements of HSG 65 and ISO 45001.

The IMS has been based on the principles of Plan - Do - Check - Act, as indicated in Figure 1 below, in order to ensure that we can use feedback to achieve continual improvement.



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Figure 1:
Interaction of the elements of the Health and Safety Management Systems

4.2 Health, Safety and Wellbeing Policy

The company HSW policy statement giving the overall objectives of the IMS is discussed in section 2 above.

4.3 Planning

The requirements of the IMS are planned in two levels, companywide and on a site or activity basis. Companywide planning is described below and site-specific planning is described under 'Implementation and Operation'.

4.3.1 Hazard Identification, Risk Assessment and Determining Controls

MWH Treatment recognises its duty to identify hazards and to assess the risks to employees and others who may be affected by our operations from a health, safety and wellbeing perspective.

Those employees identified in section 3.2 are charged with the responsibility for ensuring that formal hazard identification and risk assessments are carried out by competent persons to determine the necessary preventative measures.

High risk activities have been identified and procedures and processes have been put in place that detail the precautions required to reduce risk to as low as reasonably practicable from these activities. The procedures in place are used to formulate clear instructions for those employees supervising or carrying out the work.

These procedures are reviewed as required due to changes in operations, legal requirements or as identified during audits or reviews.

4.3.2 Legal and other requirements

Current Legislation

Process SY04 Legislation and External Standards

Our statutory obligations are identified and recorded on our subscription to the Barbour Comprehensive online system and other obligations are identified in SYRE04-01 Register of SHEQ Compliance Obligations. The register of Compliance Obligations is updated regularly (and reviewed on an annual basis as a minimum by the SHEQ Department as advised by the SHEQ Director, Head of SHEQ or H&S Managers or Advisors. The Barbour Comprehensive platform provides alerts when legislation is updated for a competent member of the SHEQ team to review.

MWHT provide access to relevant standards (Client, Industry, BSI etc) through the IHS platform which is available through Company Intranet.

4.3.3 Objectives and Programmes

Process SY02 Management Review and Action Plans

Operational HSW objectives and targets will be set at project level; and shall be recorded in construction phase plans.

HSW objectives and targets are set from previous years data in relation to incident and Improve IT! reporting. These can be viewed on the MWH Treatment SHEQ website on the company intranet.

A SHEQ Action Plan is produced to define the objectives and targets for the significant HSW risks and initiatives for continual improvement. Minutes of meetings and update of the Action Plan will record the progress of any identified initiatives. The Action Plan is communicated to the SLG, Regional SHEQ Leads, Operations and Function Leads and all Employees through relevant meetings and briefings.

4.4 Implementation and Operation

4.4.1 Resources, Roles, Responsibility and Authority

The organisation is shown in appendix 1 and the reporting structure is outlined in Section 3 above.

4.4.2 Competence, Awareness and Training

Process HR18 SHEQ Training

The qualifications, skills and experience of personnel will be assessed prior to their first engagement to ensure that they will be competent to carry out their intended duties. Employees will also be subject to appraisals on a periodic basis and, in particular, before any proposed change in responsibility or allocated task. Where a training need is identified, suitable training will be arranged, e.g. external training courses, in-house seminars, supervised work experience, etc., as appropriate.

The minimum training standard for employees is identified in the Company Health and Safety Processes and HRGD06-01 SHEQ Training Matrix and on the companies SHEQ competence and training management system, HandsHQ.

Training requirements for subcontractors are managed as per CD30 Site Induction and SHEQ Training Requirements.

4.4.2.1 Induction Training

Induction training is carried out for new employees engaged by the Company or transferred to a new site or working location. Induction training will be given by a suitable person such as the head of department or the safety supervisor at the site / workplace where the new employee will be required to work. The training will be updated to reflect changing hazards at the workplace and refresher training given at appropriate intervals.

Additional Procedures for New Employees under 18 Years Old

Process HS13 Vulnerable Persons at Risk

Employees will be informed they must not operate any plant or use any power tools or equipment unless being trained under the **direct** supervision of a competent person.

A specific young person's risk assessment shall be written and is to be 'signed off' by a parent / guardian and the education body of whom the employee is studying with, (If applicable), before employee commences work.

4.4.2.2 Health and Safety Managers and Advisors

The Health and Safety Advisors will be trained in accordance with guidance issued by the Construction Industry Advisory Committee to the HSE in the booklet "Guidance on

Health and Safety Advisory Services for the Construction Industry Part 2 Selection, Training and Professional Standards".

4.4.2.3 Management

All management staff will receive training in relevant health and safety matters according to their responsibilities as defined in this Policy Manual. Training will be repeated at intervals to reinforce the requirements or to encompass changes in legislation.

4.4.2.4 Employees

Employees will receive training in relevant HSW matters according to the tasks they are required to perform. Training will be repeated at intervals to reinforce the requirements, to encompass changes in legislation or when significant changes to working methods are to be introduced.

Safety training for employees and in particular site operatives will be arranged by the SHEQ Skills Department, as per HandsHQ or when requested by management.

4.4.2.5 Training Records

Records of training will be stored on HandsHQ. Any records of training prior to implementation of HandsHQ may also be on the Network Drive.

4.4.3 Communication, Participation and Consultation

Process SY09 Consultation and Communication

H&S communications mirror the Environmental Management Manual which has adopted ISO 14063:2006 'Environmental communication – Guidelines and examples'. The ethos of that document is that all H&S communications will be transparent, appropriate, credible, responsive and clear.

Internal communication of IMS information is achieved by a number of methods, as outlined in SYPD09-01 Consultation and Communication

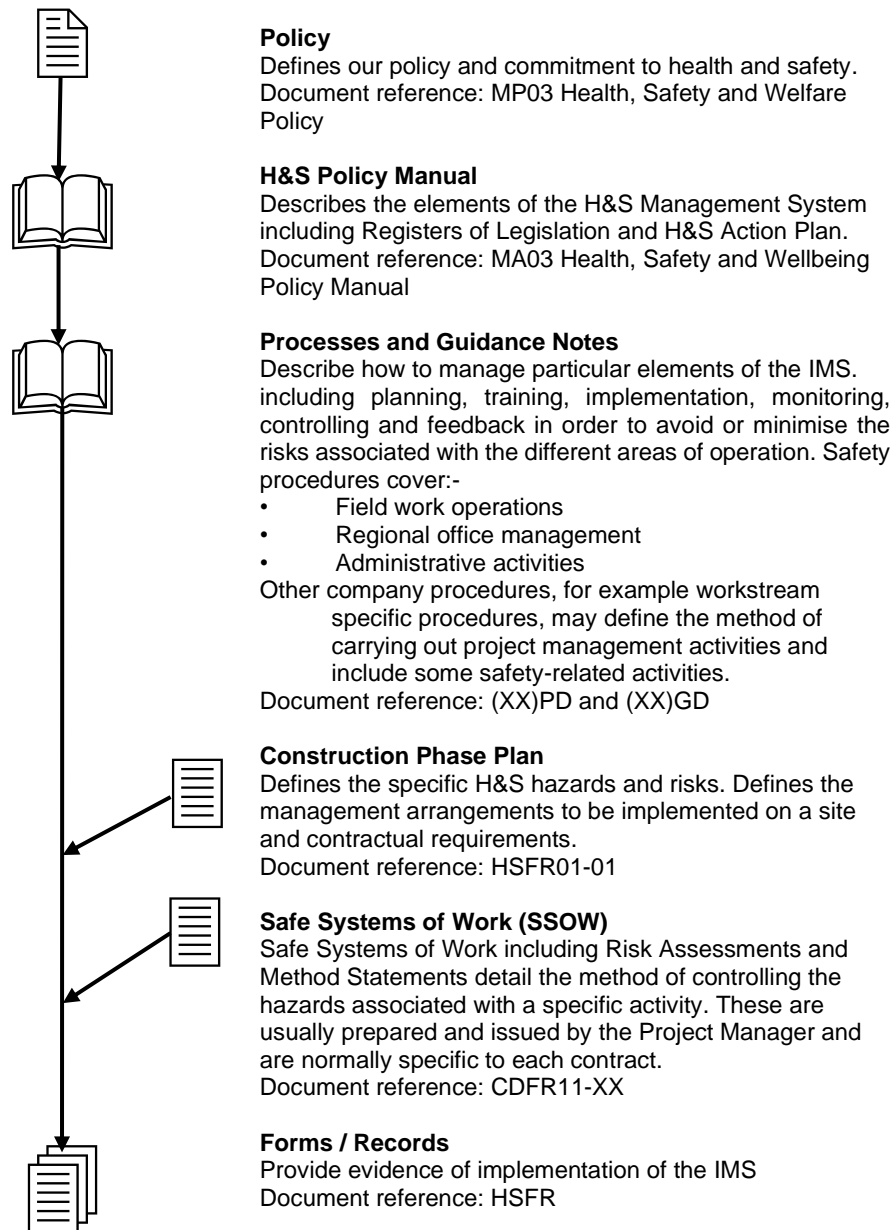
Communication with relevant external parties will be undertaken on a project by project basis. Communication with the relevant H&S regulators will be established prior to the start of activities. Communication will be controlled as:

- Technical queries and H&S Regulator consultation is covered by the SHEQ Managers and Advisors.
- Contractual communication is covered by the Regional Business Managers, Operations Managers, Proposals Manager, Project Managers and Site Managers or other appropriate person, where required.
- Press releases are covered by the Marketing and Communications Department.

In the event of an H&S incident on site, the client will be informed and a decision will be made as to who contacts the H&S Regulator.

If an H&S incident occurs in an MWH Treatment office, the regional H&S Manager or Advisor should consult the SHEQ Director as to whether reporting to the H&S Regulator is necessary. MWH Treatment H&S emergency plans are to be followed.

4.4.4 Documentation



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Figure 2: Principal Internal IMS Documentation

The documentation shall be reviewed for suitability and effectiveness on a regular basis, as required. Revisions shall be issued as and when necessary. Refer to process SYPD01-01 SHEQ System Documentation and Records.

4.4.5 Implementation

Site Managers shall adopt safe working practices as outlined in company procedures, from information in the CITB publication GE 700 Construction Site Safety, HSE Approved codes of practice and Guidance Documents and relevant standards.

Management are responsible for ensuring that all personnel under their control understand the HSW policy and implement the relevant processes, and that the necessary health and safety instructions are available for reference.

For offices, processes in the Facility Services workstream outline the requirements and a FSFR03-08 Regional Office H&S Plan will be created which will be their working document.

All personnel shall operate in accordance with the relevant health and safety processes associated with their work so as to minimise the risks to themselves and to others.

4.4.6 Control of Documents

Process SY01 SHEQ System Documentation and Records

All IMS documentation has a unique reference number and an issue or revision number. External standards will be obtained from IHS accessible via company intranet. Externally produced documentation that is an integral part of the IMS will be reviewed annually to ensure the current edition is in use.

The latest version of the IMS documentation is available for reference via company intranet and on IFS.

Personnel who have a direct responsibility for implementing the IMS shall have access to the relevant documentation via company intranet or IFS. Such personnel can set up alerts to inform them of updates.

Superseded or obsolete documents shall be destroyed, or marked as such, to avoid inadvertent use.

4.4.7 Operational Control

HSGD01-01 contains the correspondence between the Clauses of ISO 45001 and MWH Treatment procedures and processes. These procedures explain in greater detail how hazards are managed within MWH Treatment to reduce and minimise the risk to employees and others who may be affected by our operations.

The main high risks identified are briefly outlined in the following sub sections.

4.4.7.1 Occupational Health

The company implements an occupational health strategy. Access to an occupational Doctor and / or Nurse is available to identify and consult on occupational health issues. Surveillance programmes for staff exposed to manual handling, sewage, chemicals, Display Screen Equipment and noise are run on a continual monitoring cycle as per HRPD03-01 Employee Medical Process.

The main objectives of this program are to:

- Identify and discuss occupational health problems and review / refer for assessments and complete pre-employment medicals
- Make site inspections to overview processes
- Carry out health surveillance as advised / programmed
- Counselling for work related stress
- Provision for full medical checks following serious illness or injuries

4.4.7.2 Work Equipment

Company procedures covering the procurement, suitability and safety standards of all plant and machinery and are applied in line with the Provision and Use of Work Equipment Regulations 1998 (PUWER), Lifting operations and lifting equipment regulations 1998 (LOLER) etc.

All work equipment where the supplier/ manufacturer has identified a significant risk will be subject to a thorough risk assessment, including the machine, the operator, others who may be affected and the environment etc. Copies of training records for specific equipment are maintained on Site or by the SHEQ Training Department on HandsHQ and Network Drive.

All work equipment is subject to safety checks by the operator before use. Where equipment is subject to specific legislation, the equipment will be assessed by a competent person to ensure the legal requirements are met. Such work equipment will be subject to a maintenance schedule that will be recorded.

4.4.7.3 Control of Substances Hazardous to Health (COSHH)

The use of chemicals and other hazardous substances at work can put people's health at risk, in the short term and through long term exposure.

Hazardous substances can be generated by a work process (e.g. cutting stone flags, welding fumes), existing at the workplace, in contaminated land (biological workplace) in excavations or substances used as part of the overall work process e.g. mixing cement.

MWH Treatment shall ensure that exposure of employees to Hazardous Substances are eliminated or effectively controlled. Such control is based on risk assessment and the introduction of appropriate control measures. COSHH MSDS and Risk Assessments can be created using MWHTs access to SYPOL COSHH Management software.

4.4.7.4 Portable Electrical Equipment

All portable electrical equipment will be inspected and tested before first use and tested for electrical safety following British Standards criteria for testing frequency and standard in compliance with the Electrical Equipment (Safety) Regulations 1994.

4.4.7.5 Electrical Installations

The company will install, use and maintain electrical installations in compliance with the Electricity at Work Regulations 1989.

4.4.7.6 Computer Equipment

DSE Assessments will be completed for all employees on ActivSHEQ of computer workstations to ensure suitability for use and compliance with the Display Screen Equipment Regulations 1992 (DSE) as amended by the Health and Safety (Miscellaneous Amendments) Regulations 2002.

4.4.7.7 Drugs and Alcohol

MP18 MWH Treatment Alcohol & Drugs Policy explains the testing and disciplinary procedure adopted by MWH Treatment.

Support will be given to those who come forward to admit they have an existing drug or alcohol problem.

4.4.7.8 Control of High Risk Activities

For those activities which have been identified as High Risk and cannot be controlled by risk assessment or method statements, then the works shall be carried out under a permit to work system.

4.4.7.9 Safe Systems of Work (SSoW)

All site activities, including those associated with construction, installation, commissioning, operation, maintenance, modification, demolition, etc., shall be assessed for health, safety and wellbeing risk. Where a significant risk is identified, a SSoW and / or Safety Risk Assessment and Method Statement shall be used to control the measures to be adopted.

The scope of SSoW shall include those activities specifically identified in the Construction Phase Plan and / or as requested by the Client.

4.4.7.10 Lifting Operations

Lifting operations are carried out using hired lifting appliances and accessories.

All lifting operations carried out where MWH Treatment has the responsibility for that operation shall be carried out in accordance with the Lifting Operations and Lifting Equipment Regulations 1998 and the BS 7121 series Codes of Practice for safe use of cranes.

Lifting Operations should be clearly identified as soon as possible during the project planning stages to ensure that a safe system of work can be put in place.

MWH Treatment IMS procedures clearly identify who is responsible for the control of lifting operations to company and statutory requirements.

4.4.7.11 Excavation Operations

Excavation operations including shafts and earthworks carried out by and on behalf of MWH Treatment shall be undertaken in a safe manner, and to eliminate the risk to all persons. This will be achieved by safe systems of work, through inspections which are recorded and the timely completion of any remedial actions identified.

A risk assessment must be carried out and recorded prior to the commencement of excavation. The risk assessment shall define the requirements of Permits to disturb ground.

4.4.7.12 Working at Height

It is recognised that working at height remains the largest single cause of serious injury within our industry. Construction Management are to ensure that careful consideration is given where the requirement to work at height cannot be eliminated.

Work at Height access and work platforms will be thoroughly examined prior to use and only erected by those who are competent to do so.

The risk to employees is to be reduced as far as reasonably practicable and a SSoW put in place to control the work at height.

All working at height operations carried out by MWH Treatment shall be in accordance with the Working at Height Regulations 2005.

4.4.7.13 Confined Space Entry

Entry or work in confined spaces is to be avoided unless it has been determined that there is no reasonably practical alternative.

Alternative methods of working that do not involve entry into the confined space or to reduce the confined space working must also be considered.

Where there is no alternative but to carry out confined space working, it will be carried out in accordance with IMS procedures. Site management are responsible for planning the confined space entry to minimise the risk to those employees carrying out the work. They will ensure that a SSoW is in place for the confined space entry.

All confined space operations carried out by MWH Treatment shall be in accordance with The Confined Space Regulations 1997.

4.4.7.14 Personal Protective Equipment (PPE)

PPE will be provided free of charge to all employees that have been identified as requiring PPE to carry out a specific task.

Procurement will ensure that only PPE which meets the requirement of European Standards or British Standards as applicable, is purchased.

Employees will be required to look after and wear the PPE as directed.

MWH Treatment will conform to the requirements of the Personal Protective Equipment Regulations 1992.

4.4.7.15 Control of Sub-contractors

Sub-contractors will be required to carry out tasks on behalf of MWH Treatment to the company standard.

Procurement will control the appointment of sub-contractors, and only approved sub-contractors may be used.

All subcontractors must adhere to CMGD03-01 SHEQ Code for Subcontractors.

The evaluation of the sub-contractor will be dependent on the service provided and the level of risk involved.

4.4.7.16 Temporary Works

Temporary works includes scaffolding, formwork, falsework, excavation support systems etc.

Where there is a requirement to carry out temporary work, it shall be controlled by an appointed Temporary Works Co-ordinator. They shall ensure that the temporary work is adequately designed, erected or installed, loaded and unloaded in a controlled manner and under a SSoW.

4.4.7.17 Asbestos Management

MWH Treatment do not normally work with asbestos in their day-to-day operations. To ensure that the risk to employees from asbestos is managed effectively MWH Treatment shall ensure that:

- Employees are prevented from risk of exposure
- Surveys are arranged to be carried out when applicable

- Sub-contractors are licensed
- Supplied products are asbestos free
- Presume Asbestos Containing Materials (ACMs) are present, unless there are good reasons not to do so
- The risk of exposure from ACMs and presumed ACMs are assessed and prepare a written plan of the actions and measures necessary to manage the risk (e.g. the 'management plan')
- Control measures put in place are adhered to
- Any known disturbance of ACMs is reported to the duty holder

MWH Treatment will conform to the requirements within the Control of Asbestos Regulations 2012.

4.4.7.18 Lone Working

To ensure that lone working is managed effectively a specific Risk Assessment is carried out for any employee who is required to work alone. Responsible Managers must ensure that all alternatives to Lone Working have been fully exploited and these alternatives are included in the specific Risk Assessments.

Whenever practicable, information is to be requested from the client for those areas (postcodes) which are deemed a High Risk.

4.4.7.19 Noise

MWH Treatment have a legal duty to effectively manage noise in the workplace and to reduce the risk of damage to the hearing of employees and others.

Responsible managers shall ensure that, within their areas of responsibility, noise from our work operations and equipment used is managed as required by MWH Treatment IMS procedures.

MWH Treatment will conform to the requirements of the Control of Noise at Work Regulations 2005.

4.4.7.20 Manual Handling

Wherever possible all practical means of reducing the need for manual handling of loads must be taken and mechanical plant or handling aids utilised.

The risk to employees from manual handling operations shall be risk assessed to reduce that risk.

Employees required to carry out manual handling will be trained in the techniques necessary to enable them to carry out those tasks without risk to their health and safety.

MWH Treatment will conform to the requirements of the Manual Handling Operations Regulations 1992 (as amended).

4.4.7.21 Occupational Road Risk (ORR)

MWH Treatment has a clear duty to manage work-related health and safety risks, which includes occupational road risks. As work-related RTIs are a significant cause of preventable death and injury MWH Treatment believe that people should be protected from the hazards associated with ORR.

MWH Treatment shall manage the risk to employees from ORR by ensuring that:

- The control measures are communicated and implemented
- The control measures in place include suitable and properly maintained vehicles; driver suitability, fitness and training; and realistic timescales for journeys, to prevent stress or pressure to take risks
- Journeys are to be properly planned to avoid undue fatigue and plans reassessed if weather conditions deteriorate
- The use of hand held mobile phones and other devices are prohibited whilst driving
- Responsible managers are to consider alternatives to driving, for example train travel or video-conferencing.

4.4.7.22 Hand Arm and Whole Body Vibration

To manage the risks from Hand Arm Vibration (HAV) and Whole Body Vibration (WBV) MWH Treatment shall assess the risks to employees.

The use of equipment with reduced exposure to vibration shall be investigated and used in preference to recording of the Exposure Action Values and Exposure Limit Values that employees may have been exposed to.

Employees who are regularly exposed to a HAV & WBV risk must also be subjected to a regular health check.

MWH Treatment will conform to the requirements of the Control of Vibration at Work Regulations 2005.

4.4.7.23 Smoking / Vaping

MWH Treatment has, as required by current regulations, banned smoking from all working locations including company vehicles. Vaping is also banned from all working locations.

Each site or office shall allocate a Smoking / Vaping area for those employees who Smoke / Vape.

4.4.7.24 Stress

MWHT maintains a companywide Stress Risk Assessment, available on the [Wellbeing page](#) on the company Intranet, detailing control measures, some of which are listed in section 4.4.7.26. MWHT also has a MP92 Stress Management Policy which is available on all sites.

4.4.7.25 Fatigue

MWHT maintains a companywide Fatigue Risk Assessment available on the [Wellbeing page](#) on the company Intranet, detailing control measures, some of which are listed in section 4.4.7.26. MWHT also has a MP91 Fatigue Management Policy which is available on all sites.

4.4.7.26 Mental Health and Wellbeing

Good mental health and wellbeing is one of MWHTs seven [Life Saving commitments](#) and supporting the wellbeing of our employees and subcontractors, and their families and support networks, is a key priority. Just some of the actions taken to support and improve the wellbeing of our staff include:

- Comprehensive wellbeing intranet page and externally accessible Mental Health First Aid kit including signposts to support and access to MWHT Employee Assistance Provider (EAP)
- EAP awareness training for all employees
- EAP available to extended family members
- >10% of employees are Trained Mental Health First Aiders and posters identifying MHFA displayed on all sites, offices and company intranet
- Mental Health awareness Training for all employees
- 8 module mandatory Line Manager training including modules around wellbeing, mental health and Diversity and Inclusion
- Policies around Fatigue Management, Stress Management, Agile and Flexible Working, Extended Parental and Special leave.
- Wellbeing section on bimonthly SHEQ conference call with interactive anonymous Sli.do platform for feedback
- Rate My Wellbeing Survey run quarterly and HSE Stress Indicator run annually. Data reviewed and fed back through SLG to implement corrective actions. Information fed back to employees at regional briefings.
- Absence monitoring.
- Pre start medical questionnaire / health assessments available to all employees.
- Annual PDR / Lets Talk includes wellbeing reviews.
- Flexible and Agile working available to all as per MP58 Agile Working Policy and MP76 Formal Flexible Working Policy.
- Company support groups available for issues such as Menopause.
- Employees returning to work supported as per HRPD07-01 Sickness and Return to Work.
- Trauma support available via EAP following incidents.
- Building connections mandatory for all employees to encourage networking.
- Whistleblowing hotline available to all and communicated in induction.

4.4.8 Emergency preparedness and response

Procedure CD32 Site Safety Emergency Arrangements, FS04 Office Safety Emergency Arrangements and HS01 Health and Safety Plans.

Construction Sites: The nominated responsible manager is to ensure that a Construction Phase Plan is raised that includes Emergency Preparedness and Response planning. They are to ensure that there are resources available to carry out emergency practices as appropriate.

Other work locations: The nominated responsible manager shall ensure that an Emergency Plan is raised. They are to ensure that the necessary resources are in place, that everyone is aware of their responsibilities and shall carry out practices as appropriate.

4.5 Checking

4.5.1 Monitoring and Measurement

MWH Treatment recognises the importance of ensuring that the objectives and targets set within the policy are effective. MWH Treatment will use active and reactive monitoring to ensure that the policy remains effective.

4.5.1.1 Active and Continual Monitoring

Continual monitoring is a process to be undertaken by the nominated site H&S representative, e.g. Project Manager, Site Safety Supervisor etc.. Its purpose is to observe the implementation of the processes and procedures required. It serves, with audit and review, to assure MWH Treatment that the Health and Safety policy is being fully and correctly implemented.

Active monitoring is the review of activities to ensure that they are being undertaken correctly and will take the following forms, which support and compliment continual monitoring:

- Senior Management Safety Tours
- Risk assessments/ Method Statements
- "Improve IT!" reporting i.e. employee feedback
- SHEQ Audits
- Training Conducted
- Internal and External Audit Reports

4.5.1.2 Reactive Monitoring

Reactive monitoring is the review of activities after an incident or dangerous occurrence in order that the causation can be identified and steps put in place to minimise the likelihood of reoccurrence. Reactive monitoring will take the form of post incident investigations. These investigations will include but are not limited to:

- Review of audit reports
- Occupational Health reports
- Incident report
- Concerns being directly raised
- Dangerous occurrence reporting
- Enforcement authority action
- Accident data review

4.5.1.3 Use of Monitoring Equipment

Where there is a requirement for specific criteria to be met, e.g. vibration recording, maximum noise levels, etc., suitable and calibrated monitoring equipment shall be used. Tests shall be carried out by a competent person.

4.5.2 Evaluation of compliance

SY04 Legislation and External Standards

Compliance with the legislative requirements, and other SHEQ obligations, is verified by means of a legislation compliance audit as per SYPD04-01 Legislation and External Standards.

4.5.3 Incident investigation, non-conformity, corrective and preventive action

SYP07 Reporting and SYP08 Investigation and Review

It is company policy that all incidents and near miss events, no matter how small, are reported and recorded. These events will be investigated, as per Process SYPD08-01 Investigation and Review, with the aim of identifying the cause of the event, identifying the underlying cause, recommendations to aid prevention or re-occurrence and review relevant company procedures and safe systems of work.

Where an Incident or 'Improve IT!' notice is reported, the H&S Manager or Advisor shall carry out an investigation dependant on the level of risk and as required.

Where a specified injury, disease or dangerous occurrence is identified as described in the Reporting of Injuries, Diseases and Dangerous Occurrence Regulations (RIDDOR), the company will report the event to the enforcing authority in the time period stated or in a timely manner. This will be done following the company procedure.

Incident causes to be considered include:

- Training and competence of the parties involved.
- The provision and use of PPE and protective devices.
- Type of work being performed.
- Substances or materials in use.
- Working conditions at the time.
- Root cause analysis.

ActivSHEQ, the companies SHEQ data and reporting system, will be used to record incidents and monitor trends. The company will carry out proactive monitoring of these events to establish trends and causation with the aim of implementing procedures to reduce the likelihood of recurrence.

When considered necessary, a Director Review shall be set up to consider the findings as per procedure SYPD08-01. The review will usually comprise of the Regional Director / Manager, SHEQ Director or Regional SHEQ Manager, Manager concerned and others as appropriate. The review shall agree the actions to be taken and develop an Action Plan.

Where deficiencies are identified as a result of inspections or management system audits, a Non-Conformance or Observation shall be raised, depending on the significance of the finding. The person responsible for the activity, e.g. Project Manager / Site Manager, shall be required to confirm what remedial action is required and the date for implementation. The root cause of the problem will be determined and where appropriate, corrective actions will be implemented. This will be recorded on ActiSHEQ. The finding will not be closed out until the Auditor is satisfied that the actions have been completed.

Risks requiring actions to address Risks or Opportunities may be identified as a result of Legislative review, Construction Phase Plan review or as a result of other meetings where HSW matters may be discussed, e.g. Design Review, Operational Meetings, H&S Committees, etc. Recommendations shall be forwarded to the SHEQ department or raised as an Improve IT! On ActivSHEQ.

In specific cases derogation may be necessary from company procedure. This will normally be due to client requirements or short term situations for specific frameworks or projects. In such cases these derogations must be approved and recorded as per procedure SYPD06-01 Derogation.

4.5.4 Control of records

Procedure SY01 SHEQ System Documentation and Records.

HSW records are maintained to provide evidence of implementation of the IMS and to demonstrate compliance with the requirements of ISO 45001 or applicable legislation. Key records are kept for the retention period defined in the procedures for reference purposes and / or to comply with statutory requirements.

4.5.5 Internal audit

Procedure SY03 Management Systems Audits.

The purpose of the audit programme is to ensure that Inspections and audits of sites are carried out by the H&S Managers & Advisors. Other audits are carried out to ensure that best HSW practices are being operated and the requirements of the H&S Management Plan, Procedures and Guidance Notes are being followed. These types of audits are to be carried out by qualified and experienced persons who are independent of the project or site management.

In addition, periodic audits of the IMS will be undertaken to ensure continued effectiveness and compliance with ISO 45001. The auditor will be an experienced person who is independent of the activity being audited and are free from bias and conflict of interest.

4.5.6 Review of Safety Performance

The SHEQ Director shall present a report on significant HSW matters, incident statistics and updates on the H&S Action Plan at the monthly SHEQ SLG meeting.

4.6 Management review

Procedure SY02 Management Review and Action Plans

- The SHEQ performance of the company is reviewed on a routine basis by the SLG.

An Annual review is undertaken and an Annual Review Report produced, to look at the overall performance of all aspects of the IMS during the previous year and to set the objectives for the next, as per SYGD02-03 Annual SHEQ Review Meeting Agenda. The report of this will be reviewed and approved by the Chief Executive.

APPENDIX 1: MWH TREATMENT ORGANISATIONAL CHART

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