

Occupational Health & Safety Policy Statement

We, the management of Malakoff Limited, are fully committed to protect all of our employees and direct labour from risks of occupational injury or ill health.

This will be achieved through a programme of Occupational Health & Safety and Risk Management throughout our Company.

The programme will enhance our commitment to fulfil requirements in the Health & Safety at Work etc. Act 1974, the Management of Health and Safety at Work Regulations 1999, the Workplace (Health, Safety & Welfare) Regulations 1992, the Health & Safety Consultation with Employees) Regulations 1996, and all other relevant regulations pertaining to our operations.

As well as the legislation requirements, we strive to comply with all the standards we are accredited to, the relevant industry best practice, and any other standards that are related to our work.

The management understands and accepts full responsibility for the occupational health, safety and welfare of all our employees and direct labour working within our company and other persons who may be affected by our work and operations.

The management expects all employees and direct labour to report any accidents, near misses and hazards immediately to the Production Director or the HSQE Manager.

Every employee also has an obligation to take reasonable care for their safety and for the safety of other people who may be affected by their acts or omissions. They are also obliged to co-operate with Malakoff Limited in respect of matters concerning occupational health and safety. The involvement and co-operation of employees at all levels is essential for the implementation of this policy.

Malakoff Limited is committed to the continual improvement of the occupational health and safety of employees within the Company as well as subcontractors and visitors to the Company.

Adequate resources will be provided to ensure all our employees, subcontractors and other persons who may be affected by our work and operations are aware of this policy and committed to its effective implementation.

There will be active open communication and consultation between all of our employees, subcontractors and other persons who may be affected by our work and operations. Occupational health and safety will be integrated into our communications, wherever appropriate.

Our policy will be delivered by:

- generating a culture that does not tolerate threats to occupational health and safety;
- ensuring the real involvement of all our employees and direct labour working within our company and other persons who may be affected by our work and operations; and
- providing immediate access to our Occupational Health and Safety Policy through the Employee Handbook provided to each employee.

The policy will be reviewed annually during the Management Review meeting and updated as and when any new regulations or processes are introduced within the company.

Signed By:



Director Date: 14 September 2021

Endorsed By: Allan Gould, Non-Executive Director

Douglas Stevenson, Director

Colin Duncan, Director Date: 14 September 2021 Revision: REV 8

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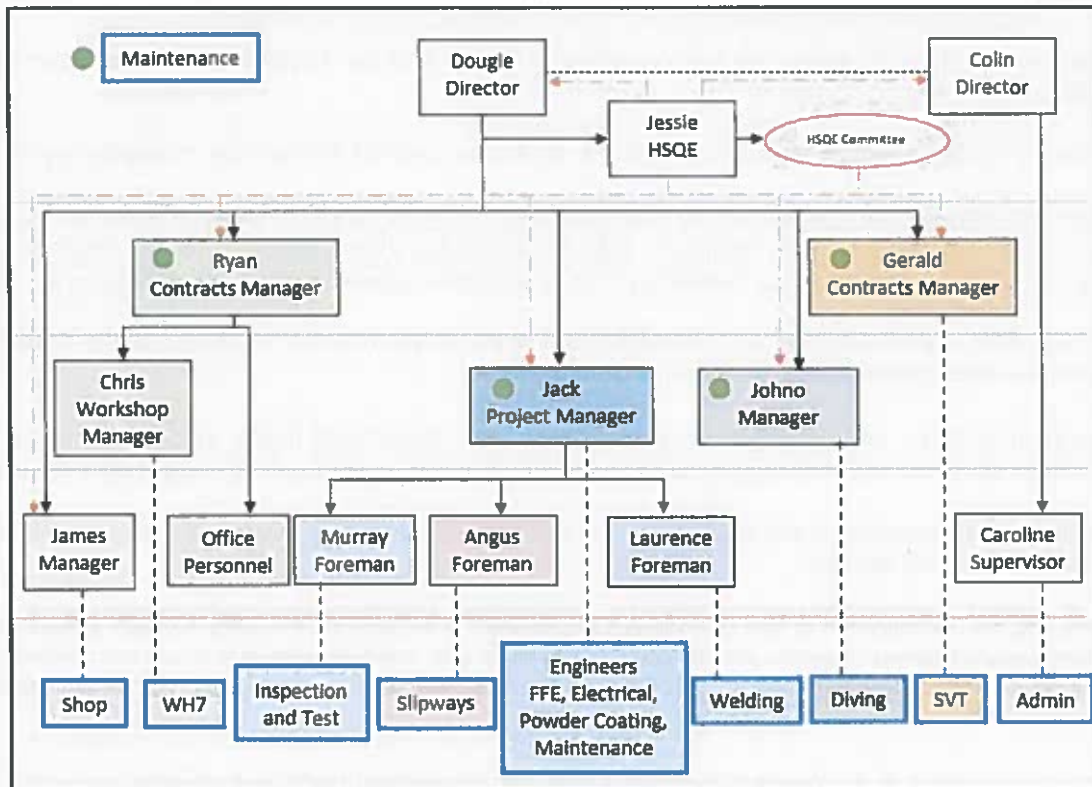
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Occupational Health & Safety Policy - Roles and Responsibilities



The Shareholders and Directors have delegated the authority to the Production Director (Dougie Stevenson)

Production Director (Dougie Stevenson) - Roles and Responsibilities

The Production Director (Dougie Stevenson) has the accountability for occupational health and safety matters within Malakoff.

The Production Director will ensure that:

- adequate resources are provided for occupational health and safety;
- occupational health and safety is adequately assessed, controlled and monitored; and
- our people are actively involved on matters that affect occupational health and safety.

HSQE Manager (Jessie Szego) - Roles and Responsibilities

The HSQE Manager (Jessie Szego), as authorised by the Production Director (Dougie), has the overall responsibility for the occupational health and safety management system within Malakoff, as well as responsibility for the HSQE Committee. The HSQE Manager will delegate occupational health and safety matters to Management.

Management - Roles and Responsibilities

All Managers, Foremen, and the Admin Supervisor will ensure that:

- all work under their control is managed and carried out in a safe way at all times;
- they provide suitable and sufficient instruction, training, and resources to all those under their control; and
- they report all accidents, near misses, and hazards immediately to the Production Director or the HSQE Manager.

HSQE Committee (Engineer, Office/Shop, Welder, WH7, Slipway, Diver, SVT, SPC) - Roles and Responsibilities

The HSQE Committee representatives will ensure that:

- they report all accidents, near misses, and hazards immediately to the Production Director or the HSQE Manager;
- they retain open communication on occupational health and safety issues with all Management, Employees, Subcontractors, and Visitors;
- they carry out monthly safety inspections, as directed by Jessie.

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Occupational Health & Safety - Control Measures

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1. Accident Reporting and Investigation

Management Procedure P03 Emergency Procedures and Reporting

- You must report all accidents, however slight, to your supervisor and have it recorded in the accident book. It is the responsibility of the site supervisor to ensure that accidents are recorded, and reports forwarded immediately to the HSQE Manager.
- You must also report all near misses, however slight, to your supervisor and have it recorded.
- An unsafe behaviour could easily become an accident or a near miss, and this should be reported through your supervisor, to your HSQE Representative, or direct to the HSQE Manager.
- The HSQE Manager, with help from you, will investigate all accidents and near misses to drive improvement in our occupational health and safety management. Any lessons learned from such events will be used to take corrective action to prevent recurrences, thereby continually improving the occupational health and safety management system.
- Reporting of accidents, diseases and dangerous occurrences will be made to the HSE in accordance with the requirements of RIDDOR.

2. Alcohol and Drugs

Smoking, Alcohol and Drugs Policy

The Company is committed to maintaining healthy, safe and productive working conditions for its entire staff. We recognise the impact that both alcohol and drugs may have upon an individual's ability to work safely and correctly and, as such, we aim to ensure a working environment free from the inappropriate use of substances and where its employees are able to carry out their duties in a safe and efficient manner.

- The consumption of alcohol by members of staff is strictly prohibited at any time during working hours or before work as alcohol can adversely affect judgement and performance leading to an unsafe working environment.
- The use of illegal drugs by members of staff is strictly prohibited at any time as they can adversely affect judgement and performance leading to an unsafe working environment. Employees who are prescribed by their doctor drugs that may affect their ability to work/dive/drive/operate machinery (or ability to perform any other aspects of their duties) should immediately discuss the problem with their manager.
- Dispensing, distributing, possessing, using, selling or offering to buy controlled substances at work is prohibited.

3. Asbestos

Work Procedure WP19 Asbestos Removal and Control

Asbestos in all forms is an extremely hazardous material and carries severe risks to health which can arise from inhaling the fibres.

- If you suspect that a material is or contains asbestos report it immediately to your line management/supervisor. Do not attempt to remove or work with it.
- If your job requires you to work with asbestos materials, then you must have a valid certificate for "Non-Licensable work with Asbestos including NNLW"
- A third-party has carried out asbestos surveys on all of the Company buildings, identifying the location of asbestos, its condition and control methods.
- Building asbestos surveys are recorded for any buildings that are rented by the Company for our use.

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4. Duties under the Construction (Design & Management) Regulations

Work Procedure WP23 CDM Requirements

Under the Construction Design and Management (CDM) Regulations we, Malakoff Limited, may either be the Principal Contractor or the Contractor.

As Principal Contractor we will make sure that:

- We liaise with the Client and Principal Designer.
- We prepare the Construction Phase Plan.
- We organise cooperation between contractors and coordinate their work.
- Suitable site inductions are provided.
- All reasonable steps are taken to prevent unauthorised access.
- All workers are consulted and engaged in securing their health and safety.
- Welfare facilities are provided.

As Contractor we will ensure:

- We plan, manage, and monitor construction work under our control so it is carried out without risks to health and safety.
- For projects involving more than one contractor, coordinate our activities with others in the project team – in particular, comply with directions given to us by the Principal Designer or Principal Contractor.
- For single contractor projects, prepare the Construction Phase Plan.

As a worker, you will:

- Be consulted about matters which affect your health, safety and welfare.
- Take care of your own health and safety, and of others who might be affected by your actions.
- Report anything you see which is likely to endanger either your own, or others', health and safety.
- Cooperate with Malakoff Management, fellow workers, contractors and other duty-holders, as required.

5. Communication and Consultation

Management Procedure P02 Aspects and Assessments

Consultation and Communication with employees happens through:

- Memos sent out with payslips.
- Email communication with those who have access.
- The HSQE Committee either via the HSQE WhatsApp group or the monthly meeting.
- Safety Flashes that highlight recent accidents, either within or out-with Malakoff.

6. Confined Space

Work Procedure WP07 Confined Space Working

- All confined space entry will require a permit to work and all those entering the confined space and those in the rescue team must have classroom confined space training.
- A gas free test must be carried out by an authorised gas tester and personal O2 monitors should be carried at all times.
- There must be a rescue plan and appropriate rescue equipment in place prior to any confined space entry.

7. Electrical tools and equipment

Management Procedure P10 Maintenance, Inspection and Test

- All cable connections must be properly made. Under no circumstances will insulation tape alone be used to protect any repair or join in extension cables.
- The correct extension cables will be used, to cope with wet and rough conditions. Extension cables will be minimised by the provision of adequate numbers of socket outlets. Extension cables, when used, will be routed so as not to cause tripping of similar hazards.
- Whenever possible, site electrical supplies will be protected by residual current and other such protection devices.
- All portable tools, cables etc. should be identified and regularly inspected and maintained by a competent electrician. Check equipment before use for any sign of damage and report defects immediately.
- All maintenance work on electrical equipment should be undertaken with the equipment 'dead' and the supply cable disconnected where appropriate. Where 'live' work or testing is required for fault finding then an authorised competent person, who must apply the relevant control measures to prevent danger, must only undertake this.
- If anything goes wrong, switch the equipment off and disconnect from the power supply.
- Do not lift or pull equipment by the cable; the connections may become broken and create a hazard.
- Cables will be routed so as to be protected from damage.

8. Fire Precautions

Fire Safety Policy

A Fire Risk Assessment has been carried out at all Malakoff sites, providing the Company controls for fire prevention.

Each person in Malakoff should:

- Always obey the NO SMOKING policy.
- Do not place clothing over or against heating appliances.
- Do not allow a build-up of combustible material to gather.
- When carrying out 'hot work' make sure that you have a fire extinguisher close by.
- Familiarise yourself with the fire alarm signal.
- Be aware of the exit routes from the workplace.
- Find out the location of the muster and/or the assembly point.
- Familiarise yourself with the location of fire alarm points.
- Familiarise yourself with the position and use of any fire-fighting equipment.
- On finding a fire, raise the alarm, and if safe to do so, fight the fire with the appropriate fire-fighting equipment.
- Do not put yourself in any danger.

9. First Aid

Management Procedure P02 Aspects and Assessments

People at work can suffer injuries or fall ill. It does not matter whether the injury or illness is caused by the work they do or not. What is important is that they receive immediate attention and that an ambulance is called in serious cases. First Aid provision at work can save lives and prevent minor injuries from becoming major ones.

- First Aid assessments have been made and are reviewed for each site in the Company.
- First Aid Boxes are provided at various locations throughout the workplace and are checked periodically to ensure that they are adequately stocked.
- A number of staff have been trained in administering First Aid and a list showing trained staff is on display in each workplace.

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10. Control of Substances Hazardous to Health

Management Procedure P02 Aspects and Assessments

There is a vast range of substances in use at work, which have the potential to cause harm if not handled properly. The Control of Substances Hazardous to Health Regulations (COSHH) 2002 governs the use of most of these substances. Under these regulations COSHH Assessments have to be made to indicate the hazards and the precautions necessary to reduce the exposure to these substances which must be taken by personnel using the substances.

Anyone working with hazardous substances must:

- Always check and understand the requirements of the COSHH assessment before starting work. If you do not understand or if an assessment is not available, then ask your line manager/supervisor.
- Before using, transporting or storing any substance always read and understand the container label. If the label is damaged, or missing, report it to your Supervisor and do not use the substance.
- Always follow the requirements of the assessment and the instructions on the label.
- Never mix two substances together unless the instructions say that it is safe to do so.
- Always report leaks or spillages to your line manager/supervisor and use the correct clean up measures.
- Use the engineering controls and protective equipment stated in the COSHH assessment.
- Make yourself familiar with what to do in the event of an emergency e.g. fire, spillage etc. and understand the first aid requirements.
- Adhere to good hygiene practices and do not eat, drink or smoke when using or working near to hazardous chemicals.
- Ensure that you fully understand the warning symbols/hazard pictograms on the COSHH containers as they identify the largest risk.

11. Emergency Procedures

Management Procedure P03 Emergency Procedures and Reporting

Each Malakoff location has an Emergency Plan that details what to do in the case of the following incidents:

- Spill
- Fire
- Vehicular Accident
- Explosion
- Gas Cylinders in a Fire
- Specific Site Emergencies such as Diving

Where the Company's operations are carried out on a third party's premises or site, then co-operation will take place with the Client/Owner in formulating common emergency procedures.

12. Hazard Identification, Risk Assessment and Risk Management

Management Procedure P02 Aspects and Assessments

- We identify our workplace occupational health and safety hazards and assess the risks associated with these hazards. Following this we take action to prevent, reduce or control risks to an acceptable level and reduce the potential for incidents and accidents.
- Suitable and sufficient assessments will be made of the risks to the health and safety of employees and others who may be affected by the Company's operations.
- We require our subcontractors to identify occupational health and safety risks that may impact on our work activities and report these to us.
- All employees and subcontractors working for us are informed of the occupational health and safety hazards and risks that affect their work and the measures to reduce the risk.
- All employees are informed of hazards that may arise in the course of their work and where necessary, be given suitable training and instruction so that they will be able to carry out their duties without risk to their own health and safety or that of others who may be affected by their acts.
- Safe systems of work have been developed and used to protect persons, plant, equipment and property from being exposed to assessed hazards and any associated risk potential during the Company's operations.

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13. Ladders

Risk Assessment REA-009-07 Use of Ladders and Step Ladders for Access

Accidents involving ladders account for many serious injuries. Because the ladder is regarded as one of the most basic forms of access, the dangers are not always anticipated.

- Ladders should only be used where other more suitable access methods are not possible or practicable and should only be used for short duration (up to 30 minutes) low risk tasks.
- Inspect ladders before each use. Report defects to your line manager/supervisor. Do not use defective ladders.
- Set ladders on a firm and level base. Ensure that they are securely tied or footed and cannot slip outwards.
- Use the 'one-in-four rule', i.e. the ladder should slope 1 metre out at the base for every 4 metres of height.
- When using a ladder try to maintain 3 points of contact at all times.
- Ensure the ladder is long enough, it must project at least 1 metre above the landing place.
- Work safely from ladders at all times. Use both hands to climb and descend and do not overreach when working from a ladder.

14. Manual Handling

Management Procedure P02 Aspects and Assessments

Manual handling causes almost a quarter of all injuries at work. Most of the injuries are to hands, feet, legs and backs. Some of the back injuries can result in permanent disability.

- Assess the load.
- If mechanical handling equipment is provided and you are trained and authorised to use it, then do so.
- Wear the right equipment for the job; for example, safety boots, gloves, coveralls, hard hat, eye protection and any equipment that may be specially provided as a result of risk assessment.
- Know your physical capabilities and only tackle jobs you can reasonably handle.
- Think the job through.
- Always check the load before lifting.

15. Monitoring and Measuring Occupational Health and Safety Performance

Management Procedure P02 Aspects and Assessments

Management Procedure P11 Internal, Supplier, Subcontractor and External Audits

We, actively and openly, review and report on our health and safety performance to be able to continually improve our occupational health and safety management system through:

- Review of each accident and near miss investigation to discover the root cause.
- An annual review by Management of the types of accidents and near misses, including the physical location of the accident/near miss, the body part that was hurt, and the level of the injury to see if there are any trends.
- Quarterly measurement of our occupational health and safety targets.
- Internal and external audit results.
- Clear and relevant occupational health and safety objectives and targets that are identified based on both past performance of the Company and targeting future commitment of the Company in regard to continual improvement of our occupational health and safety.

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16. Noise

Management Procedure P02 Aspects and Assessments

Prolonged exposure to noise can seriously and permanently damage your hearing. The louder the noise and the longer the exposure, the greater the damage. Deafness caused by excessive noise develops so gradually that the affected person may not realise what is happening. It is therefore necessary to take the following precautions when working in noisy environments.

- Rule of Thumb - if you have difficulty hearing normal conversation at a distance of approximately 2 metres using normal speech levels, then hearing protection should be worn.
- If you are in doubt or feel uncomfortable about the noise level that you are working in, ask your line manager/supervisor. It is in your own interests to ask for and use ear protection.
- Follow legal requirements: 80-85db(A), you are provided with hearing protections; 85dB(A) or above, you must wear hearing protection.
- Ensure that the ear protection is effective and fits correctly.
- We have a third-party carry out noise assessments of all areas and those within and above the legal limits are assessed and provided with notices for hearing protection.

17. Occupational Health

Management Procedure P02 Aspects and Assessments

- We assess our occupational health risks through our risk assessment process.
- Everyone is informed of the occupational health risks that affect your work and the action to prevent, reduce or control occupational health risks to an acceptable level.
- Health surveillance is carried out for every employee at a maximum of every two years and is also available when required.
- Third-party reports are held for air monitoring (welding and painting), noise assessments, and vibration assessments.
- Metal working fluid is tested to ensure no bacteria is growing.

18. Occupational Health and Safety Training

Recruitment, Competency, Training and Awareness Policy

Management Procedure P06 Recruitment, Competence, Training and Assessment

- Everyone is instructed and trained on the occupational health and safety issues that affect you, and the safe working practices that should be followed.
- Subcontractors attending our sites will be inducted so we can communicate our occupational health and safety risks to them and receive confirmation of their understanding of the same.
- All new employees and contractors receive a Company induction to ensure that they are aware of Company and legislative requirements pertaining to their health and safety. All employees will be re-Inducted every 3 years.
- You will be encouraged to participate in all training events arranged on your behalf.
- Training requirements will be identified taking into account business objectives as well as individual aspirations which are likely to contribute to meeting these objectives.

19. Personal Protective Equipment (PPE) and Respiratory Protective Equipment (RPE)

Management Procedure P02 Aspects and Assessments

- Everyone will be provided, as a result of risk assessment, with personal protective equipment to allow you to work in a safe manner. The provision of such personal protective equipment will be without cost to you.
- In most work activities Personal Protective Equipment (PPE) forms the last line of defence against injury, illness and disease. It is therefore very important that suitable PPE/RPE is supplied and worn where necessary.

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- Whenever you are supplied with any PPE/RPE you have a legal obligation to wear it.
- You have a legal obligation to take care of it, ensure that it is properly maintained, suitably stored when not in use, and has any necessary inspections or tests carried out.
- If in doubt ask your line manager/supervisor what, if any, PPE/RPE should be used for your particular work activity.
- Check that the PPE/RPE you are using is suitable for your work.
- Make sure that the PPE/RPE is properly adjusted for comfort and effectiveness.
- If necessary, ask for training in the use of PPE/RPE before you start work.
- Report any defects immediately to your line manager/supervisor for repair or replacement.

20. Safety Behaviour and Safety Culture

Management Procedure P02 Aspects and Assessments

It is important that we, as a Company, strive to continually improve our occupational health and safety performance. In order for this to happen we require both the senior management and the workers to come forward with any occupational health and safety concerns to the HSQE Manager. This is achieved in the following ways.

- In order to demonstrate leadership in occupational health and safety, senior management undertake tours to ensure that occupational health and safety issues are identified, assessed and managed.
- Any occupational health and safety concerns are discussed at the monthly HSQE Committee meeting, the daily Project meeting, and the annual Management Review meeting.
- Concerns can also be raised using the HSQE committee WhatsApp group. Just talk to your HSQE representative.

21. Subcontractors

Management Procedure P07 Contracts Review, Administration and Subcontracting

All subcontractors working for us will be vetted to confirm their commitment to the protection of their employees from the risks of occupational injury or ill health.

This is achieved by:

- The HSQE Manager sending a pre-qualification questionnaire and a cover letter to the potential Subcontractor.
- On receipt of the required documents the HSQE Manager shall review the questionnaire and create a file on the potential Subcontractor.
- If everything is acceptable then the Project Manager will be informed, and a letter of approval sent to the potential Subcontractor informing them that they will be added to the Company Approved Subcontractors List for future work.
- Once a Subcontractor has been selected for a specific scope of work, the person requesting the Contractor (who shall be known as the responsible person) shall ask for additional documented information to be submitted.
- These documents shall include;
 - Method statements covering the scope of work
 - Risk Assessments
 - Safe Working procedures
 - Relevant proof of training for the contractors who will be working on site
 - Relevant equipment certification
 - Any other documented information as requested
- These documents shall be reviewed firstly by the Responsible Person and then the HSQE Manager. Once approved by both, the responsible person shall arrange for the Subcontractor to attend for a site induction for ALL members of the working party.

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22. Welfare

Management Procedure P02 Aspects and Assessments

The Company will ensure that adequate welfare facilities are provided for their employees on company premises, and on client's sites, as follows:

- The provision of suitable and sufficient facilities for resting and eating of meals including tables and chairs.
- Suitable facilities will be provided for pregnant women and nursing mothers when required.
- Suitable seating for any disabled persons.
- Where necessary, those parts of the workplace (including in particular doors, passageways, stairs, washbasins, lavatories and workstations) used or occupied directly by disabled persons at work will be organised to take this into account.
- Suitable welfare facilities will be supplied on-site, as required.

23. Work Equipment

Management Procedure P10 Maintenance, Inspection and Test

Work Equipment includes any equipment use by a worker at work and includes machinery, hand tools, lifting equipment, ladders etc.

The general principles that apply to ALL work equipment are:

- Never use the wrong equipment for the job.
- Never use equipment without guarding where guards are provided.
- Never interfere with or try to by-pass control mechanisms.
- Report all defects immediately and do not use defective equipment.
- Do not use equipment unless you have been adequately trained in the safe use of the equipment provided.
- Always wear the correct PPE provided for specific types of equipment.
- Do not carry people on work equipment unless it has been designed for that purpose.
- Never use hand tools which are damaged.
- Always use the correct hand tool for the job.
- Always check the expiry date on equipment which is subject to statutory inspection – if the current certificate is out-of-date do not use the equipment and ensure that it is removed from service to prevent accidental usage.
- Always follow Safe Systems of Work and Safe Operating Procedures – do not take risks.

24. Work at Height

Management Procedure P02 Aspects and Assessments

Work Procedure WP20 Work at Height

Under the Work at Height Regulations 2005, working at height means carrying out work in any place (whether above, at or below ground level) or gaining access to such a place where if measures were not taken to prevent falling, a person could be injured. Such places include:

- Standing on a scaffold.
- Working from a MEWP (mobile elevating work platform).
- Working on the back of a lorry.
- Being lifted in a man-basket.
- Working close to an excavation where someone could fall in and sustain injuries.
- Using ladders and stepladders.

As far as reasonably practicable, avoid carrying out work at heights by carrying out as much as possible at ground level. Where this is not possible:

- First try to carry out the work from an existing workplace.

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- If this is not possible, provide a suitable working platform that gives collective protection such as a scaffold, mobile tower, MEWP, etc.
- Use a personal fall restraint.
- Ensure work is planned so that a safe access/egress is provided for operatives to work at height.

25. Working over Water

Risk Assessment REA-007-01 Working on a Vessel

Risk Assessment REA-007-02 Working Over the Side of Vessels

Risk Assessment REA-007-06 Working on Piers

When a task requires that you must work over water, precautions must be taken to prevent falls into water and more importantly to prevent drowning. If you fall or are swept off your feet by the rising sea, strong currents can carry you far from the point at which you fell in a very short time. In addition to the fall, you may have been injured and if you begin to take in water you can suffer acute physical damage in a matter of a few minutes.

It is imperative therefore that the following precautions are taken when working over water:

- Always wear warm clothing and a lifejacket.
- Follow the company's safe systems of work.
- Ensure that you always work in pairs or more, so that one of you can raise the alarm in the event of an accident.
- Ensure where applicable, that one of you have a two-way radio and that the stand-by boat has been informed of the work you are carrying out.
- Supervisors and Foremen must periodically check the number of people employed to ensure that no one is missing.
- Check that each of you are trained to be your own early warning system and that in an emergency, everyone knows exactly what to do, so that no time is lost in effecting a rescue.
- Special care must be taken with lifejackets and other safety equipment, as your life or the life of your mate could depend on them.
- Check all equipment before you use it. If it is damaged, report it, do not use it and make sure that no one else uses it until it has been replaced or repaired.

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