



Health, safety and wellbeing policy (Construction)

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1. Executive statement

Tilbury Douglas is a leading UK building, infrastructure, engineering and fit-out business, delivering vital projects across a range of sectors including health, education, highways, justice, defence, aviation, water and environment.

Tilbury Douglas is committed to providing a safe and healthy working environment for all employees, contractors, visitors, and other stakeholders. We recognise our responsibility to prevent work-related injuries, illnesses, and fatalities and to continually improve our occupational health and safety (OH&S) performance. This commitment aligns with the requirements of ISO 45001:2018 and is integral to our business operations.

Compliance with legal and other requirements

Tilbury Douglas is committed to complying with and fulfilling all applicable legal requirements and other standards related to occupational health and safety. We will identify and assess relevant legal and other requirements to ensure compliance and continually monitor changes to these requirements. In addition, a separate health, safety and wellbeing policy statement will be available to meet the requirements of legislation.

Hazard identification, risk assessment, and control

We are committed to identifying and eliminating hazards, assessing and reducing risks, and implementing effective controls to eliminate or minimise the potential for harm. Our hazard identification and risk assessment processes will be conducted regularly and involve input from workers at all levels of the organisation.

Objectives and targets

We will establish measurable objectives and targets to continually improve our OH&S performance. These objectives and targets will be consistent with our commitment to prevention, compliance with legal requirements, and the overall enhancement of workplace health and safety.

Consultation and participation of workers

We recognise the importance and are committed to the consultation and participation of workers and actively involve workers in decision-making processes related to occupational health and safety. Workers will be provided with opportunities to express their views, concerns, and actively contribute to the development and review of our OH&S policies and procedures.

Competence, training, and awareness

We will ensure that all employees, contractors, and relevant stakeholders possess the necessary competence and are adequately trained to perform their tasks safely. We will also promote awareness of OH&S issues and the importance of maintaining a safe working environment.

Emergency preparedness and response

We will establish and maintain procedures for responding to emergencies, ensuring the effective management of incidents that may impact health and safety. Regular emergency drills and reviews will be conducted to enhance preparedness and response capabilities.

Monitoring, measurement, analysis, and evaluation

We will establish a system for monitoring, measuring, analysing, and evaluating our OH&S performance. This will include the regular review of incident reports, near misses, and the effectiveness of control measures to identify opportunities for improvement.

Communication

We will establish effective communication channels to ensure that relevant OH&S information is disseminated to all levels of the organisation. This includes clear communication of roles, responsibilities, and any changes to policies and procedures. This OH&S policy is communicated to all employees, stakeholders and is available to interested parties as deemed appropriate. Tilbury Douglas is dedicated to fulfilling its obligations under ISO 45001:2018 and fostering a culture of safety and well-being throughout the organisation.

Documentation and record keeping

We will maintain accurate and up-to-date documentation related to our OH&S management system. This includes records of risk assessments, training, incidents, and other relevant information to demonstrate our commitment to continual improvement.

Review and improvement

This OH&S policy will be periodically reviewed and, if necessary, revised to ensure its continued suitability and effectiveness. We are committed to continually improving our OH&S management system and overall performance.



Paul Gandy
Chief Executive Officer



Craig Tatton
Chief Operating Officer



Matthew Gill
Chief Financial Officer



Martyn Smith
Commercial Director



Sarah McCallion
HR Director



Suzannah Harris
General Counsel



Nick Pollard
Chair

2. Introduction

Tilbury Douglas provides whole-life, sustainable solutions for building and infrastructure projects from business case through design, procurement and construction including ongoing aftercare. We create the physical assets that underpin the fabric of society.

We want everyone to feel that they have a part to play in working towards our common vision. Our vision is to be a trusted construction partner chosen for our commitment to providing assured delivery to meet customer needs. Delivering better, we build trust and both social and asset value in the creation of modern sustainable environments. We do this with resilient and progressive teams who have the right sector expertise, dedicated in the support of our customer and their local areas.

Without our people we couldn't be the business we are today, nor the business we want to be tomorrow. Putting it simply, people are our business. Ensuring a safe and a healthy working and living environment for our employees and everyone else who may be affected by our activities is essential to our current and future success and forms a core part of everything that we do.

3. Reflecting our values

Do the right thing

Striving to be incident free and always doing the safe and healthy thing.

Not accepting 'that will do' and not walking by when a positive difference can be made.

Everyone has a voice

We welcome discussion and we treat people as we, ourselves, would want to be treated.

Empowering and training people to engage and consult effectively through our behavioural approach.

Take pride in what you do

We take pride in a job well done - a job done with care and done to the best of our abilities in a safe and healthy way.

Bring better to life

We are all about believing we can do better. Asking questions, thinking differently, seeking solutions and creating ideas to be safer and healthier.

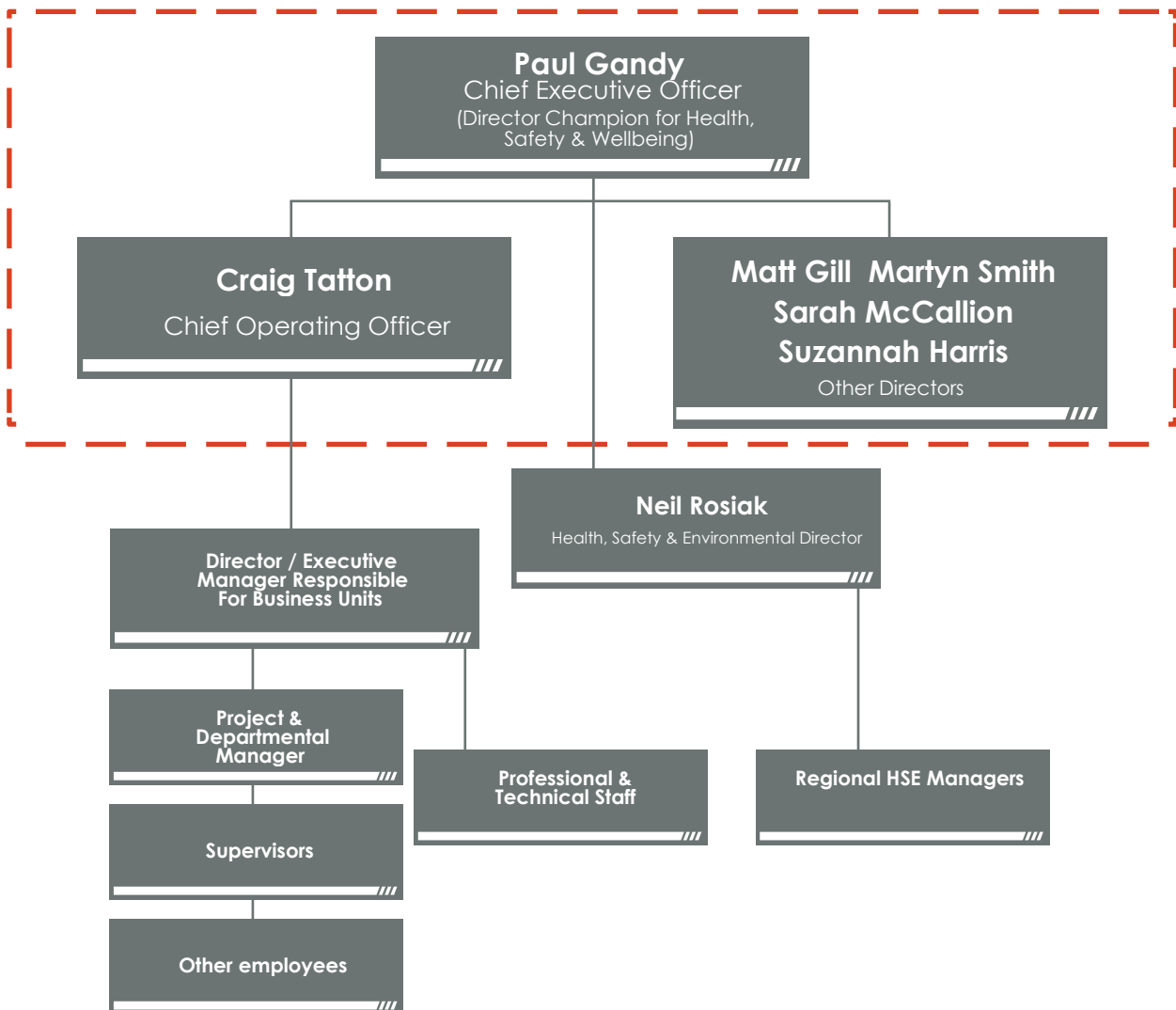
The remainder of this policy is structured around the requirements of the Health and Safety at Work etc. Act 1974.

4. Organisation

Tilbury Douglas carries out a wide range of construction and management activities.

The company operates a structure within which health and safety is a line management responsibility. Directors, managers and supervisors at all levels have responsibilities according to their position for the health, safety and wellbeing of those under their control and for those who may be affected by the Company's operations.

The Health, Safety and Environmental Director and Health and Safety Managers are appointed as "competent persons", as required by Regulation 7 of the Management of Health and Safety at Work Regulations 1999, to assist the company in complying with the requirements and prohibitions by or under the relevant statutory provisions.



Note: The organisation chart above indicates the outline organisation for Tilbury Douglas.

Where individuals and job titles change, the principles remain the same

5. Arrangements

We are committed to achieving class-leading standards and performance by placing Health, Safety and Wellbeing at the heart of our business. This approach is reinforced through the appointment of a main board director as our “Director Champion for Health, Safety and Wellbeing”

Our goal is to operate in an incident free environment and to be the best in our field. We owe this to our most important asset; our people, to the employees of our supply chain partners and customers, and to members of the public who live, work and commute near our sites.

6. Resources

To ensure that our health and safety performance is as strong as our commitment, the Company evaluates the need for and provides adequate resources including people, plant and equipment, materials, time and finance to ensure the health and safety of its employees and others affected by its operations. This includes standards of supervision for all works under our control.

We have established effective processes in place and a team of Health and Safety Managers. These are supported by the Corporate Health and Safety Department and by a Technical Services team for design and temporary works expertise.

Further support is available from the Company's other Corporate Services.

External organisations are used as required to provide other services such as information and training, occupational hygiene, health surveillance, counselling and environmental support, where necessary.

7. Management systems

Our health and safety management system is implemented in all parts of our business to deliver the highest standards of performance and covers all areas of our operations; planning, control, monitoring and review.

Management systems are developed based on business needs with supporting information and are available on the company intranet.

Planning	Control	Monitoring	Review
<p>H&S plans prepared, implemented, monitored and reviewed at all locations</p> <p>Systematic approach to risk assessment adopted for each operation</p> <p>Emergency plans considered and established where appropriate</p>	<p>Clear responsibilities defined</p> <p>Standards and controls established in Healthy and Safe Systems of Work</p> <p>Effective communications through a defined regime of inductions, briefings, toolbox talks</p> <p>Permit to work regimes</p> <p>Effective supervision</p>	<p>Clear objectives and targets applicable to all business units</p> <p>Pro-active regime of inspections and process surveys</p> <p>Pro-active health surveillance regime for at risk employees</p> <p>Reactive regime of near miss reporting and accident/incident investigation</p> <p>Trend and themes reports completed and communicated</p>	<p>Regime of regular management reviews in place</p> <p>Hierarchical review structure from main board to projects</p> <p>Management system regularly reviewed along with all relevant data to ensure continual improvement</p>

This management system is in accordance with and certified to ISO 45001 Occupational Health & Safety Management System.

We use the CIP publication "Construction Health and Safety" for reference in support of our management systems, which is made available in hard copy as well as via the internet.

8. Skills, knowledge, training & experience

We have minimum training requirements for all employees to ensure they have sufficient knowledge to undertake their roles and responsibilities.

These minimum training requirements extend to those who work for, and under the control of our supply chain when working on our projects.

Health and safety training records are maintained and regular reports made to enable a full evaluation of our performance to be undertaken.

Additionally, on our construction projects, individuals are required to hold a current and relevant industry competence card. In the event a current and relevant industry competence card is not available, employers are required to demonstrate necessary skills, knowledge, training and experience.

Selection criteria are used for subcontractor pre-qualification to ensure that only subcontractors with an appropriate level of skills, knowledge, training, experience and organisational capability are appointed.

9. Planning

Effective design and planning is an integral part of the management systems to ensure safe and healthy systems of work are implemented.

Health and Safety Plans are prepared for all our work locations and describe the management arrangements for the work location to ensure the health and safety of the workforce and others including the public.

These include; site management organisation, responsibilities, competence requirements, work location rules, health and safety risks anticipated and requirements for safe and healthy methods of work, permits to work operated, monitoring arrangements, site layout and access and welfare facilities.

10. Safe and healthy systems of work and emergency plans

Written safe and healthy systems of work are prepared and reviewed prior to commencement of activities where a significant risk to health and safety has been identified.

In planning safe and healthy systems of work, significant hazards are identified and assessed for risk. The necessary arrangements and control measures are then identified.

Where the risk is such that additional control is required we operate a suite of permits to work.

Emergency procedures in relation to fire and first aid are planned, implemented and tested. Other emergency procedures are developed as required for the activity or location.

11. Communication

Information, including emergency procedures and site rules, is provided by means of induction training, pre-work briefings/toolbox talks, notice boards and management briefings.

This process engenders consultation and co-operation between management and all site workers.

We fully recognise the importance of individual's behaviour in attaining the "next level" of health and safety performance and seek effective engagement with all those that work with us to tackle any cultural challenges.

12. Maintaining safe & healthy systems of work & monitoring performance

Performance is measured against legislative requirements and company standards with objectives and associated targets through a structured regime of inspections.

Incidents are recorded and investigated, identifying root causes and necessary actions to prevent recurrence.

Auditing of the management systems is carried out periodically to ensure that compliance standards are being achieved.

Monthly reports are published detailing performance against the company standards, objectives and associated targets.

13. Employee responsibilities

The following responsibilities are applicable for the positions detailed in the Organisation detailed on page 5.

Where individuals have additional health and safety responsibilities then these will be detailed within the health and safety plan for the work location.

If any individual is uncertain in any respect of their responsibilities, they are to raise the matter with their line manager or supervisor immediately.

All employees

- Show a personal interest and enthusiasm regarding health and safety, living the “Stop, Think, Do the Right Thing” ethos by complimenting safe and healthy working practices and challenging working practices that fall short of expectations.
- Take reasonable care to safeguard their own health and safety and that of others who may be affected by what they do or fail to do.
- Only manage, supervise, and carry out work that they have the appropriate level of skills, knowledge, training and experience to undertake.
- Co-operate with the company and will not interfere with or misuse anything provided in the interests of health and safety or welfare.
- Comply with all company management systems, rules and instructions which affect their work such that they do not put themselves or anyone else at risk.
- Ensure they are aware of, and adhere to, emergency arrangements and any additional guidance issued by the Company.
- Ensure, where there are people under their control, that they are trained and competent for the operations they are required to perform and are adequately informed of the planned safe and healthy system of work and emergency arrangements.
- Where applicable oversee any direct reports to ensure the adoption, maintenance and compliance with company management systems in relation to health and safety.
- Report any unsafe conditions, near misses or incidents/accidents/work related diseases to their line manager/supervisor.
- Where applicable ensure health and safety is included on the agenda of all meetings they chair and ensure actions are followed up.
- Set a good personal example.
- Be empowered to stop any activity should there be an unacceptable health and safety risk.

Chief Executive Officer

- Executive responsibility for management of health and safety of the company, including board approval of this health and safety policy.
- Ensure that lines of responsibility within the company are clearly defined.
- Executive responsibility to make adequate resources available to ensure the effective implementation of this health and safety policy.
- Executive responsibility for the setting and achievement of health and safety objectives and associated targets for the company to drive continual improvement.
- Executive responsibility for the management of health and safety throughout the company by including monitoring of both leading and lagging indicators and taking action where necessary.
- Conduct regular tours across all business units.
- Ensure health and safety is included on the agenda of company board meetings and actions are followed up.

Director Champion for Health, Safety & Wellbeing

This position is assigned to a member of the Tilbury Douglas Board of Directors.

The responsibilities detailed below are in addition to those line management responsibilities the position holder has as Managing Director/Director and do not detract from those line management responsibilities, or the line management responsibilities of others.

The Director Champion for Health, Safety and Wellbeing will facilitate the Board in:

- Formulating/developing health, safety and wellbeing policy.
- Setting health, safety and wellbeing objectives and associated targets.
- Considering health and safety implications when making decisions.
- Reviewing health and safety performance and taking action on identified problems when necessary.
- Ensuring adequate and appropriate resources are provided to implement the health, safety and wellbeing policy.

Corporate directors, Directors & Executive managers

- Responsibility for the management of health and safety and wellbeing within their area of responsibility.
- Ensure that lines of responsibility within their area of responsibility are clearly defined.
- Responsibility to make adequate resources available within their area of responsibility to ensure the effective implementation of this health and safety and wellbeing policy.
- Ensure arrangements are made to ensure all levels of staff within their area of responsibility receive adequate and appropriate training.
- Responsibility for the setting and achievement of health and safety objectives and associated targets within their area of responsibility to drive continual improvement.
- Monitor both leading and lagging health and safety indicators within their area of responsibility and take action where necessary.
- Conduct regular tours across all business units.
- Ensure that health and safety is addressed in all management meetings and actions followed up.

Project & departmental managers

- Responsibility for the management of health and safety within their area of responsibility.
- Consult and communicate with all personnel under their control.
- Develop the safety culture within their area of responsibility.
- Ensure that employees receive appropriate induction, information, instruction, training and supervision, especially young persons and those who are less experienced.
- Implement company requirements in relation to health and safety including:
 - Arrangements for a good standard of facilities including welfare.
 - Assignment of responsibilities for all levels of management and supervision to ensure safe and healthy systems of work.
- Selection and use of competent subcontractors, suppliers and designers.
- Sufficient planning including hazard identification and risk assessment.
- Preparation, review and implementation of method statements to establish safe and healthy systems of work.
- Arrangements for the provision and maintenance of suitable plant, transport and equipment.
- Monitor both leading and lagging health and safety indicators within their area of responsibility and take action where necessary.
- Report and investigate injuries, diseases and dangerous occurrences.
- Co-operate with enforcing authorities.

Supervisors

- Responsibility for the supervision of health and safety within their area of responsibility.
- Ensure compliance with company requirements in relation to health and safety.
- Contribute to risk assessment and preparation of written safe and healthy systems of work.
- Ensure that all facilities including welfare, plant and equipment are maintained in good condition.
- Ensure the implementation and maintenance of safe and healthy systems of work for all activities within their area of responsibility.
- Ensure all those within their area of responsibility have the appropriate level of skills, knowledge, training and experience, and that supervision levels are appropriate.
- Consult with employees, provide assistance and guidance to see that new employees, particularly apprentices and young person's learn to work in a safe and healthy way.

Professional & technical employees

- Implement company arrangements in relation to health and safety within their particular discipline/ field of expertise.
- Eliminate or minimise hazards wherever possible.
- Keep abreast of best practice in relation to their particular field of expertise.
- Work to professional standards for their particular field of expertise.
- Co-ordinate and co-operate with others to ensure their output contributes to the most effective safe and healthy solution.
- Ensure their output includes appropriate information to enable others to fulfil their responsibilities.

Health, Safety & Environmental Director

- Liaise and co-ordinate with Tilbury Douglas Group and other Tilbury Douglas Divisions to share health and safety best practice, lessons learnt and where appropriate shared initiatives.
- Monitor changes in legislation and best practice ensuring the Company remains compliant and at the forefront of best practice.
- Set the direction of company health and safety arrangements, acting as “process owner”, ensuring standards meet legislation and best practice.
- Review, revise as appropriate and publish health and safety management systems, processes and forms that ensure the company effectively meets its health and safety policy commitments and legal obligations.
- Lead on the development of new company health and safety systems and initiatives as identified and required.
- Review inspection and audit data, identifying issues, trends and topics where awareness needs to be raised.
- Ensure that company health and safety training is available, meets company requirements and reflects current legislative requirements and best practice.
- Develop campaigns as appropriate, and ensure that posters, toolbox talks and other promotional materials are current, relevant and promote best practice.
- Monitor the recording, investigation and analysis of information on injuries, instances of ill health and dangerous occurrences to assess trends.
- Produce regular reports for company board and management boards, attending board meetings as appropriate.
- Provide guidance and support to the health and safety managers and advisers on matters appertaining to compliance with this health and safety policy and the implementation of the Company management systems.
- Chair departmental forums and meetings to ensure consistent focus of business unit health and safety staff to current priorities.
- Conduct regular tours across all business units to ensure consistent focus of business unit health and safety staff to current priorities, and ensure acceptable standards are being achieved.
- Represent company on industry bodies and working groups.
- Maintain regular contact to foster a good relationship with the Enforcing Authority.

Health and safety managers

- Liaise, co-operate with and seek advice from the Health and Safety Director on matters appertaining to company arrangements and standards for health and safety.
- Provide a source of competent advice on health and safety matters to all those within their business unit.
- Be enthusiastic in promoting class leading health and safety standards.
- Provide assistance if required with specialist health and safety assessments i.e. noise assessments.
- Undertake inspections of all workplaces within their business unit, compiling an accurate report for the Tilbury Douglas manager for that workplace detailing inspection findings.
- Provide briefing and coaching on the implementation of company arrangements with respect to health and safety.
- Provide both formal and informal health and safety training to all levels of the organisation/ workforce.
- Participate in accident and incident investigations.
- Other duties as required to promote and improve the health and safety standards and performance within their business unit.
- Liaise with client/customer representatives to foster a good relationship.