

BUSINESS PERFORMANCE SYSTEM PROCEDURE			DOC REF:
			BPS 1-10
TITLE:	HSQE POLICY		
INITIATED BY:	TEL SULTAN MANAGING DIRECTOR	DATE:	24/11/2020
APPROVED BY:	TOM SHARD AREA OPERATIONS & UK HSE MANAGER	DATE:	24/11/2020
AUTHORISED BY:	JON WALLER OPERATIONS DIRECTOR	DATE:	24/11/2020
EFFECTIVE FROM:	24/11/2020	WITHDRAWN ON:	
ISSUED ON:	24/11/2020	REPLACED BY:	
SUPERSEDES NO:	N/A		

REVIEW PROCESS:			NEXT REVIEW DATE:	11/07/2025
ISSUE NO.	DATE OF REVIEW	CHANGES MADE Y/N	IF Y – PROVIDE DETAILS OF CHANGES MADE	REVIEWED BY
1.1	24/11/21	NO		TSH
1.2	06/10/22	NO		RJB
1.3	06/10/22	NO	Reviewed and re-signed	JW
1.4	03/03/23	YES	Added in requirements for Principal Designer	TSH
1.5	10/07/23	YES	Transferred into new format; updated references to OHSAS 18001 to ISO 45001; amended Principal Designer wording to match wording in BPS 4-10; included Principal Contractor duties from BPS 4-10	RJB
1.6	11/07/24	YES	Routine review and update to reflect current business practices, policies and procedures.	TSH, RJB & JW

STATEMENT OF INTENT

We are committed to ensuring the Health, Safety and Welfare of all members of AOL, as well as any others who could be affected by our activities, and to protecting the environment in which we operate.

Our Vision

- “To protect and improve the environment, be valued by our customers, our people and our shareholders.”
- All accidents, incidents and occupational illnesses are preventable.
- Many of our activities are specifically aimed at protecting the environment and everything we do should support this overall aim.
- Continual improvement is integral to everything we do.
- We add value to our customers and our business through delivery of HSQE excellence.

Our Mission

- Our aim is to deliver safe, innovative and sustainable solutions to help our customers minimise their environmental impact and maximise the return on their investments.

We will succeed in making our vision a reality through:

- Agreeing clear objectives, targets, and responsibilities for HSQE performance – within AOL, with our customers, and suppliers.
- Providing sufficient resources and support to achieve these objectives and targets.
- Involvement and consultation with all members of AOL in setting and delivering HSQE performance through local area HSQE plans.
- Driving continual improvement through ISO 9001, ISO 14001 and ISO 45001 compliant systems.
- Meeting and exceeding all applicable legal and customer requirements.
- Consistently implementing our quality management systems to maximise quality, efficiency, and customer satisfaction.
- Creating an environment that encourages individuals to openly raise HSQE concerns and challenge unsafe behaviour.
- Learning from our experience by thorough investigation of all accidents, incidents and raised concerns.

- Including HSQE performance in the selection, appraisal and reward of all members of AOL Industrial Solutions.
- Benchmarking our HSQE performance against companies within our sector and learning from best practices.
- Ensuring a focussed, consistent level of HSQE Leadership in line with this policy.
- Communicating the content of this policy to all employees and reviewing regularly.



Endorsed by Jon Waller
Operations Director
On behalf of the entire AOL team

ORGANISATIONAL STRUCTURE AND RESPONSIBILITY

It is recognised that the corporate responsibility for health and safety at work, the environment and quality lies in the hands of those charged with running the business and that whilst ultimate responsibility for the policy and direction of all health, safety, environmental and quality matters rests with the Managing Director, the day to day accountability for discharging it devolves through the operations director, managers and supervisors to each employee in accordance with the management structure.

To assist in the successful discharge of these duties and responsibilities, specialist advisers are employed and where necessary, additional advice from outside agencies and consultants is sought.

Specific duties and responsibilities are placed on members of the management teams and on all company employees individually to ensure that the policy is effectively administered and implemented and that all legislative requirements are understood and complied with.

Senior Management

Each member of the AOL Management Team will ensure that, within their area of responsibility, the Health, Safety, Quality and Environmental (HSQE) Policy is implemented and in particular that:

- Provision of clearly defined lines of management responsibility are identified and regularly updated to reflect change.
- Systems are in place to cover Health, Safety, Quality and the Environment with respect to design, construction, procurement, operations, maintenance, modification, and disposal of plant, equipment and facilities.
- There is a safe and healthy working environment, together with appropriate welfare facilities and medical advice.
- Managers and supervisors are trained and competent to carry out their duties and are regularly appraised with respect to their performance and against set targets.
- Appropriate training for employees and their health and safety representative, where appointed, is provided to meet the health and safety requirements of their work.
- Regular consultation with employees and their representatives takes place to ensure continued promotion and development of health and safety at work.
- Accident and incident performance are regularly reviewed.

Operations Managers

Each departmental manager is responsible for:

- The implementation of the Company's Health, Safety, Quality and Environmental Policy in the areas under their control and publicly supporting all persons carrying it out.

- Agreeing and reporting HSQE performance indicators and actively seeking customer feedback.
- Adequate supervision, by competent people, of all work carried out in their department.
- Ensuring that adequate general risk assessments, as required by the Management of Health and Safety at Work Regulations 1999, are routinely carried out and that remedial measures identified by the assessments are in place.
- Identification of training needs for all employees in the department and ensuring that the training is carried out in time.
- Consideration of all representations concerning Health and Safety relating to their department from the employees or their representatives.
- Ensuring that protective clothing and equipment, as required by the needs of the work, is available, issued and used.
- Maintaining good housekeeping standards, adequate storage facilities and suitable toilet, washing, messing and first aid facilities.
- Accounting to their responsible director for the health and safety performance within their department.
- Controlling the activities of all contractors and consultants such that the work being undertaken does not present any risk to company employees, and that such visiting personnel are not put at risk from the activities of the Company.
- Ensuring that visitors to Company premises are not exposed to risks to health and safety as a result of those activities.

Supervisors

Managers, Supervisors, or anyone responsible for other employees within the Company, are key to the success of the health, safety, quality and environmental function and are responsible for:

- Ensuring that they are fully conversant with the Company's general policy with respect to health, safety, quality and environment, and with the specific safe working and operational procedures and practices that are relevant to their area of responsibility.
- Providing an appropriate level of supervision for all employees under their control, considering ability and experience.
- Arranging for and recording initial health and safety induction training for new starters and the ongoing training of their staff relating to changes in health and safety legislation, standards and technology.
- Ensuring that all the risk assessments are conducted at the appropriate time, properly recorded and regularly reviewed.

- Conducting prompt investigations of all accidents, incidents and near misses reported to them and completing the Company accident report in accordance with the accident and incident reporting procedure.
- Carrying our regular checks that all safety protection devices are kept in good condition, that issued personal protective equipment is worn at the appropriate time and that health, safety and welfare facilities are maintained.
- Implementing of local HSQE plans with their teams with the goals and objectives designed to improve HSQE performance within their areas.

Individual Employees

In addition to any specific responsibility placed on employees by virtue of their positions they will be expected to comply with their general duties under the Health and Safety at Work Act, and in particular by:

- Taking reasonable care for the health and safety of themselves and others who may be affected by their activities whilst at work.
- Co-operating with their supervisors and managers to such an extent that will ensure that the company can satisfy its obligations under the health and safety legislation.
- Using correctly all health and safety protection devices, systems and equipment provided.
- Strictly complying with the Company's health and safety procedure and codes of practice.
- Helping to implement HSQE plans for their local area and working with their line managers to achieve the goals and objectives set out within the plans.
- Being familiar with the content and status of individual objectives on their local area HSQE plans.
- Reporting either directly to the immediate supervisor or through their health and safety representative any matters of concern regarding health and safety that arise in connection with their work activities.
- Reporting all accidents, illnesses, incidents and near misses arising out of their work activities in accordance with the Company accident and incident reporting procedure.
- Ensuring that they complete the required tasks in a competent manner meeting and exceeding relative legislative requirements.

Principal Designer

When acting as Principal Designer, the Company will perform the duties as specified in the Construction (Design & Management) Regulations 2015 i.e.:

- plan, manage, monitor and coordinate health and safety in the pre-construction phase. In doing so we will take account of relevant information (such as an existing health and safety file) that might affect design work carried out both before and after the construction phase has started
- help and advise the client in bringing together pre-construction information, and provide the information designers and contractors need to carry out their duties
- work with any other designers on the project to **eliminate** foreseeable health and safety risks to anyone affected by the work and, where that is not possible, take steps to **reduce or control** those risks
- ensure that everyone involved in the pre-construction phase communicates and cooperates, coordinating their work wherever required
- liaise with the principal contractor, keeping them informed of any risks that need to be controlled during the construction phase

Principal Contractor

When acting as a Principal Contractor we will:

- plan, manage, monitor and coordinate the entire construction phase
- take account of the health and safety risks to everyone affected by the work (including members of the public), in planning and managing the measures needed to control them
- liaise with the client and principal designer for the duration of the project to ensure that all risks are effectively managed
- prepare a written construction phase plan (PDF) before the construction phase begins, implement, and then regularly review and revise it to make sure it remains fit for purpose
- have ongoing arrangements in place for managing health and safety throughout the construction phase
- consult and engage with workers about their health, safety and welfare
- ensure suitable welfare facilities are provided from the start and maintained throughout the construction phase
- check that anyone we appoint has the skills, knowledge, experience and, where relevant, the organisational capability to carry out their work safely and without risk to health
- ensure all workers have site-specific inductions, and any further information and training they need
- take steps to prevent unauthorised access to the site
- liaise with the principal designer to share any information relevant to the planning, management, monitoring and coordination of the pre-construction phase

HSQE Support

HSQE Support provides the Company with competent health and safety advice as required under Regulation 6 of the Management of Health and Safety at Work Regulations 1999 and in particular is responsible for:

- Providing general advice on health and safety matters throughout the Company
- Providing assistance to managers and supervisors to ensure that the hazards and risks associated with the Company's operations are properly identified, assess and controlled.
- Auditing the health, safety, quality and environment management process within the Company through the formal audit system, inspections, surveys and review of accident and incident performance.
- Attendance at Company health and Safety committees and customer meetings as appropriate.
- Providing specialist assistance where required in respect of noise assessments, hazardous substance assessments, hazard and operability studies etc.
- Providing or assisting with training in general health and safety awareness as well as more specialist areas of confined space work, general risk, COSHH, display screen, manual handling assessments, CDM regulations etc
- Reporting to the appropriate authorities those accidents and incidents that are notifiable under legislation, investigating and advising on remedial measures following such events and collating the information so as to provide a record of significant learning points from them.
- Liaising with the health and safety enforcement authorities and maintaining dialogue with organisations and associations with interests in the health and safety arena.

ARRANGEMENTS FOR HEALTH, SAFETY, QUALITY AND THE ENVIRONMENT

This section summarises the arrangements made for implementing the policy, taking into account legal obligations and Company procedures and practices. It cannot be more than an overview of the Company's approach to applying good practice in its work activities and the provisions covered must be considered alongside the specific policies, procedures and guidance contained in the Business Performance System.

Health, Safety, Quality and Environmental Management Process

Health, Safety, Quality and Environmental performance is managed within AOL via the Business Performance System (BPS) and AOL corporate policies and procedures. These contain the management procedures and standards necessary to operate safely and environmentally responsibly while maintaining quality standards.

The BPS is available to all AOL employees via the company SharePoint, which can be accessed remotely from any location via the internet.

Hazard Identification and Risk Assessment

The Management of Health and Safety at Work Regulations 1999. Regulation 3 requires that *“every employer shall make a suitable and sufficient assessment of the risks to the health and safety of his employees to which they are exposed whilst at work, and the risks to the health and safety of persons not in his employment arising out of or in connection with the conduct by him of his undertaking.”*

The Company has undertaken Risk Assessments (BPS 5-2-1 or equivalent) that have identified the most significant risks associated with the Company’s activities. From these risks a series of Safety and Environmental Management Procedures have been developed that collectively document the control mechanisms to be applied to reduce the risks to as low a level as is reasonably practicable.

The Company has undertaken an Environmental Aspect/Impact Assessment (BPS-5-4-1) that has identified the most significant environmental risks associated with the Company’s activities. Where procedures have been created as a result of the above processes, they are contained within the Business Performance System (BPS) which can be found on the AOL SharePoint.

Accidents, First Aid and Work-related Ill Health

Medical/Health Surveillance

All employees shall undergo a pre-employment medical with the AOL approved occupational health provider. This will also include a risk assessment of the activities carried out by the employee which shall be used to identify if an employee is exposed to any health hazards which are specified in relevant legislation. Based on these assessments, health surveillance shall be arranged as necessary. Health surveillance records shall be kept by HR. Details of the process to be followed is detailed in BPS 6-2 and associated forms.

First Aid

In order to meet the requirements of the First Aid at Work Regulations 1981, a first aid risk assessment shall be carried out for each site/area as detailed in (BPS 5-6-2) and based on the findings of the assessment first aid provisions (trained first aiders, first aid boxes etc.) shall be established. The findings of the assessments shall be communicated to all affected personnel.

Reporting of Accidents and Incidents

All incidents shall be dealt with in accordance with BPS 5-6 Incident Reporting and Investigation Procedure. All incidents must be reported to the HSQE Manager using our online reporting tool and the hse@aquaoptions.co.uk mailbox.

The HSQE Manager shall assess the incident for reportability under the Reporting of Injuries, Diseases and Dangerous Occurrence Regulations (RIDDOR) 2013, and where necessary inform the enforcing authority.

Reporting of Potential Hazards

Once potential hazards have been identified they should be raised using one of the following:

- The AOL Hazard Reporting system and AOL corporate policies and procedures,
- The customer specific forms / systems as appropriate

The line manager / team leader should assess the potential and actual severity of the hazards reported and where appropriate implement BPS 5-6 Incident Management procedure.

Alcohol and Drugs

It is recognised that abuse of alcohol, drugs solvents etc., can pose a risk to all people in the workplace and managers and supervisors within the Company will remain alert to the potential, taking action to ensure that any employee involved is helped, whilst not compromising the health and safety of fellow employees, contractors, customers, and visitors. The company's Alcohol and Drugs policy is stated in BPS 6-11 with further guidance given in BPS 6-11-2 and AOL Corporate policies and procedures.

Training, Competence and Development

The Company has its own training plan in order to co-ordinate training activities. The training plan is focused on technical, mandatory and HSQE related training. This will assess the individual's competence and detail the skills, knowledge, and behaviours necessary for achieving performance and defining personal development.

Competency requirements are assessed for roles that individuals are engaged in and plans put in place to close any identified gaps to enable them to carry out activities in a safe and compliant manner.

Basic health & safety training is provided to all employees when joining the business. Additional training requirements are identified by Line Managers through discussions and one-to-ones with their teams.

Following any training, a review with the individual will be carried out to assess the extent to which the training has satisfied learning needs and identify any further training requirements.

This process is outlined in BPS 6-3 "Competency Based Training".

Communication and Consultation

Communication and consultation at all levels within the organisation is recognised as one of the key elements to successful HSQE management through a combination of the following:

- One-to-one consultations
- HSE Committee meetings
- SharePoint Safety Bulletins
- Toolbox talks

Contractors

Whilst contractors working for the Company are generally responsible for complying with health and safety matters in respect of their work it is acknowledged that there is often an interface with

the Company's activities that requires direct consultation with respect to arranging control. The Company will always require its contractors to demonstrate through their policies, procedures and work methods, their competence to undertake the contracted work. Contractor assessment and review is outlined in BPS 7-2.

A part of the business of the Company is involved in construction operations as covered by the Construction (Design and Management) Regulations 2015 (CDM), both within the operational activities e.g., service laying, repairs etc., and with the delivery of major infrastructure projects. Different parts of the Company can at any time be undertaking any or all of the defined roles within CDM, namely Client, Designer, Principal Designer, Principal Contractor and Contractor in a large number of contract situations. CDM compliance is addressed through the Company's Project Management process and training is undertaken for all staff involved. Details of how AOL complies with the CDM regulations is outlined in BPS 9-3 "CDM Guidance Notes".

HSE Rules

It is AOL Policy that all employees (including temporary workers) are issued with the BPS 5-1-4 Company HSE Rules and Life Saving Rules so that they are aware of the responsibilities placed on them by statutory and Company requirements.

Contractors shall be issued with a separate more detailed set of HSE rules – BPS 9-5 "HSQE rules for contractors".

Discipline

The Company places a high level of importance in its health and safety programme and will treat any violation of the policy and procedures with serious concern and subject to action within the disciplinary procedure.

Display Screen Equipment

Compliance with the Health and Safety (Display Screen Equipment) Regulations 1992 is carried out via BPS 5-2-4 "Display Screen Equipment Assessments" which involves a process of questionnaire, workstation assessment and referral to an optician as required.

When using customer's DSE, we shall ensure their display screen equipment and procedures satisfies Health and Safety (Display Screen Equipment) Regulations 1992 and follow their processes else we use BPS 5-2-4.

Fire Protection

In fixed work locations all fire precautions, fire-fighting equipment and provision and control of the means of escape in case of fire are provided following a fire risk assessment in compliance with the relevant local regulations (The Regulatory Reform (Fire Safety) Order 2005, Fire Certificates (Special Premises) Regulations (Northern Ireland), Fire Safety, Scotland Regulations 2006). All firefighting equipment is inspected and maintained under contract by a competent inspection body.

The manager responsible for the premises will ensure that the firefighting equipment is maintained as per the building specific fire risk assessment; that the fire alarm systems are

routinely tested, evacuation drills undertaken, and staff trained in firefighting equipment and emergency actions.

Hazardous Substances

Control of risk associated with the use of hazardous substances is carried out in accordance with the requirements of the Control of Substances Hazardous to Health Regulations 2002 (COSHH) via BPS 5-2-2 "Control & Minimisation of Chemical Risks". Identification of potential for risk from hazardous substances is firstly identified from the general risk assessment programme and then subject to a specific COSHH assessment. Where appropriate further assessment approaches can be undertaken to minimise risk.

Records of substance inventories, safety data sheets and COSHH assessments as appropriate are maintained at each site in a suitable location and staff are made aware of the contents.

Information relating to substance hazards are provided as necessary to contractors working on Company premises to assist them in satisfying their own responsibilities under the Regulations and to customers when Company staff are working on their premises.

Manual Handling Operations

Preliminary identification of manual handling hazards is conducted in the general risk assessment programme and where required additional assessments are then undertaken with reference to the specific activities in accordance with the requirements of the Manual Handling Operations Regulations 1992. The AOL specific requirements for managing the risks associated with manual handling operations are detailed within BPS 5-2-3 "Control of Manual Handling Risks"

Legal and Other Requirements

Procedures have been developed to identify, assess, and communicate legal and other requirements that are applicable to the business. Tracking systems have been introduced to allow updates to be provided to ensure that all information is current (BPS 5-1-3 Evaluation of Compliance).

Legionella

AOL acknowledges and accepts its responsibilities under the Health and Safety at Work Act 1974 and the HSC Approved Code of Practice 'The control of legionella bacteria in water systems' approved code of practice and guidance' (2013) and other associated legislation. The Company will comply with all guidance issued by the Health and Safety Executive in this respect.

AOL will prevent exposure to airborne Legionella bacteria released from water systems under its control, and where this is not reasonably practicable, will control the risk of exposure.

Monitor & Review

A programme of internal and external audits is prepared for all departments and contracts. The methodology used to conduct the audit is to use an audit protocol designed to incorporate the elements of ISO 9001, ISO 14001 and ISO 45001. The system identifies recommendations for

improvement which are cross reference to relevant questions and classified with an associated timescale for completion.

The Management Team undertakes a review of the Company Performance Systems at management review meetings.

Noise

Identification of potential for risk from noise is addressed in the general risk assessment and then subject to specific noise assessments as required.

Consideration to the effect of noise for both occupational and environmental exposures is given in the design of facilities and the procurement of plant and equipment.

Objectives and Targets

Objectives and targets have been developed, taking into account the significant health, safety and environmental risks, technological options and in consultation with all employees. These are widely communicated to all. To achieve the determined objectives and targets, action plans have been developed to define the principal actions to be undertaken, those responsible, and scheduled times for their implementation.

Objectives and targets shall be set at a Company level by the HSQE Manager.

Each Site Manager shall ensure an HSQE plan is in place for each local area/departmental team outlining relevant targets and objectives to improve HSQE performance of the local area.

Personal Protective Clothing and Equipment

Whilst use of personal protective clothing and equipment is acknowledged as being the least impactful option in the control of risks at work, there are however situations where its use cannot be avoided.

All protective clothing and equipment deemed necessary because of the general risk assessment programme will be to a standard assessed in accordance with the requirements of the Personal Protective Equipment at Work Regulations 2002 as capable of providing the necessary protection when worn correctly.

Account will be made of personal characteristics in relation to the individual provision of such equipment as appropriate and the issue will be controlled through the line management and the HSQE Manager. Details of the AOL process for PPE Management can be found in BPS 5-5-1.

Plant and Equipment

All items and machinery, plant and equipment used are subject to the appropriate level of examination, testing and maintenance to enable them, when used correctly, to be safe and without risk to health. Purchase of such items takes account of the Supply of Machinery Regulations 2008 and the Provision and Use of Work Equipment Regulations 1998.

Company testing and examination procedures cover:

- Electrical equipment

- Lifting Equipment
- Pressure systems
- Company vehicles and mobile plant
- Scaffolding
- Ladders
- Portable gas detectors

In addition to the requirements set out in the PUWER 1998 regulations, all testing and examination procedures will meet the legal requirements set out in any relevant specific legislation e.g., Lifting Operations and Lifting Equipment Regulations 1998, Electricity at Work Regulations 1989, Work at Height (amendment) Regulations 2007 etc.

Policy Review

The HSQE Policy will continue to be reviewed annually by the Operations Director for general accuracy of content and will be amended to account for changes relating to legislation, company procedures and standards as appropriate.

Every major change to the policy will be notified to employees in line with our policy on Communication and Consultation above.

The Working Environment

The Company endeavours to maintain for all employees a healthy and safe total work environment in compliance with the Workplace (Health, Safety and Welfare) Regulations 1992 and with particular attention to:

- Suitable safe access and egress to and from each working area which takes account the condition of floors and walkways, segregation of pedestrian and vehicle traffic and levels of lighting.
- Appropriate methods of providing heating and ventilation or recourse to such provision where the work is substantially outside.
- Well maintained, clean and tidy floors and passageways
- Adequate welfare facilities
- Sound structures and materials of construction

Our Core Values

- An absolute focus on Health, Safety and the Environment with the aim of setting the highest possible standards.

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- An open and inclusive culture with a focus on Cross Functional Teams, Quality, Delivery, Ownership and Leadership.
 - Working together in an environment of trust and mutual respect for all.
 - Development of our people to meet their, and the company's, aspirations and potential.
 - Excellent understanding of customer needs and business drivers with delivery of appropriate solutions.
 - Delivery of the best solutions irrespective of the technology source or our commercial returns.
 - Delivery of Commercial and Technical Innovation.
 - Be a company that people are proud to be part of.

