



Occupational Health and Safety Policy

Health and Safety at Work Act 1974

Document review history			
Date	Revision	Change details	Section
24/06/2009	0	First issue	N/A
01/06/2014	1	General review	All
24/06/2018	2	General review	All
07/06/2019	3	General review	All
24/02/2021	4	General review	All
25/08/2021	5	Review and rewrite to cover scope, personnel changes, company profile, organisation and arrangements.	All
15/08/2022	6	Review and update with inclusions to scope of work and control measures	All
15/08/2023	7	General review and inclusion of mental health, noise & HAVS considerations	All
14/08/2024	8	General review plus expanded sections on Risk Assessment, Mental Health, Site Fire Controls, and Plant/ person interface	All
22/08/2025	9	Review & minor additions, plus DSEAR, Radon, Legionella and SHE compliance	All

MORGANS OF USK LTD - H&S POLICY STATEMENT

The company is committed to fulfilling its legal duty under the Health and Safety at Work Act 1974 and the Management of Health and Safety at Work Regulations, plus any associated legislation. Adequate financial provisions to meet such requirements shall be made available.

The main responsibility for Health and Safety lies with the Managing Director and Board of Directors.

The company is bound by any acts and or omissions of the Managing Director, any executive director or manager, giving rise to legal liability, provided only that such acts and or omissions arise through the course of company business.

The company shall provide and maintain plant, equipment and systems of work that are safe and without risk, and make arrangements for the safe use, handling, storage, and transport of plant, materials and substances, ensuring such plant, materials or substances are safe and without risk to health or safety when used correctly.

The company shall provide the necessary information, instruction, training and adequate supervision to ensure the health and safety at work for employees and workers.

The company shall maintain suitable and sufficient welfare facilities as specified in the Workplace Health, Safety and Welfare Regulations.

The company shall provide personal protective equipment free of charge where appropriate, including instruction in and enforcement of its use.

The company shall take reasonable measures to protect persons, whether employees or not, from risks to their health and safety arising from normal activities of the company, to ensure that the plant or substances, or access to and egress from the premises is controlled safely and without risk to health and safety.

The company shall maintain an accepted standard of first aid facilities, trained first aiders and suitable controls to manage Fire risks at both its own facilities and external construction sites.

Joint consultation and participation between management and employees, to promote and maintain safety and freedom from risk to health shall be actively encouraged.

Employees are required to take reasonable care for the health and safety of all persons at work and co-operate with management to this end (as required under Section 7 of the Health and Safety at Work Act).

The company shall continually seek improvements in their safe systems of work to reduce accidents, damage incidents and risks to health.

All contractors and sub-contractors will conform to the current issue of "Safe Working Procedures for Contractors" issued by the company.

Signed: A. Morgan

Date: 27/08/2025

Andrew Morgan Managing Director

Scope

This Safety policy document outlines the plans of Morgans of Usk Limited (MOU) to satisfy the Health and Safety requirements of the Health & Safety at Work Act 1974, the Management of Health and Safety at Work Regulations 1999 and all other applicable legislation.

It is applicable to all our operations throughout Wales and the United Kingdom and covers the design, manufacture and erection of structural steel frames and buildings within the construction industry.

The policy is a controlled document within our Safety Management System. The document is intended for use as a public document that displays the company's commitment to achieving a high standard of health and safety in all our activities.

The ultimate goal of the Company is to ensure that every worker and person engaged in works on behalf of MOU returns home safely at the end of every shift.

Company profile

Morgans of Usk Ltd (MOU) is a structural steel fabrication company currently based in South Wales. The company specialises in the design, detailing, fabrication and painting of portal frames and structural steel buildings for the industrial, residential, commercial, data storage and public service sectors.

The company operates from two manufacturing facilities – Woodside works, Usk, Monmouthshire, and Ontario works, New Inn, Pontypool, Torfaen. Both sites employ the use of CNC process machinery, welding and oxy fuel burning equipment, LEV extraction equipment and paints spraying plants.

The company currently employs in the region of 125 directly employed staff and utilises a number of agency staff in our workshops and long-term approved subcontractors to assist with our on-site operations.

Head Office & Usk works;
Woodside Works,
Woodside Industrial Estate
Usk,
Monmouthshire.
NP15 1SS.

Pontypool works;
Ontario Works,
Pont Y Felin Road
New Inn, Pontypool
Torfaen.
NP4 0DQ

What 3 words:

Usk - [*stiletto.fruity.tangent*](#)

Pontypool - [*stem.assets.makes*](#)

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Organisation

Safety of Personnel : Managing Director (MD)

The person with ultimate responsibility for Occupational Health and Safety at Morgan's of Usk Limited is the Managing Director, Mr. Andrew Morgan.

The MD will provide the oversight for internal risk and compliance activities to ensure the Health and Safety policy and guidance are effectively implemented, risk is assessed and appropriately managed.

To fulfil the responsibility the MD shall;

- Review the company Health and Safety performance regularly.
- Ensure that H&S Policy statements reflect the current board priorities.
- Ensure that management systems provide effective monitoring and reporting procedures.

The Managing Director will also set an example by his own behaviour and involvement in health and safety matters, and will appoint competent staff and representatives to manage and assist him to fulfil these duties.

Line Management responsibilities are laid down as follows;

SHE Manager (Safety, Health & Environmental)

The SHE Manager has been appointed to provide competent and professional advice and support to the business in accordance with the Health and Safety at Work Act (and all other relevant legislation). Duties of the SHE Manager are as follows;

- Monitoring of the general operation and effectiveness of this safety policy.
- To have adequate knowledge and observe the requirements of the Health and Safety at Work etc Act 1974 and all other relevant statutory provisions governing the company's operations.
- Advise the Managing Director and Senior staff with competent advice on legislative requirements, updates and industry best practice in relation to our current activities.
- Assembling and maintaining information on current and proposed legislation, along with other types of literature to provide a comprehensive information and reference service for all employees.
- To promote a greater health, safety, environmental and quality awareness throughout the company by initiating timely proactive measures and awareness training.
- Liaising with any enforcement bodies regards visits, enquiries, enforcement action, help or advice (HSE, NRW, Fire Service, local authorities, etc)
- Carrying out detailed investigations of accidents and incidents, and recommend any suitable corrective actions and improvements post investigation.
- Liaising with the company Insurance providers regards Risk analysis, incident claims and continual improvement plans.

- Maintaining an effective accident reporting system, producing relevant statistics on company incidents, and formulating effective corrective and preventative actions as required.
- Implement and manage the Occupational Health surveillance program including drug and alcohol surveillance monitoring.
- Investigate and identify the hazards and risks present within the business, and to assess, advise mitigation and ensure all control measures are implemented and briefed to all relevant staff, contractors and supply chain accordingly.
- Review and update of Risk Assessments (including COSHH) relevant to all workshop activities.
- Review and updating of the framework of Safe Systems of Work, including permit to work systems where required.
- Liaising with the safety committee on all matters appertaining to Health and Safety and arrange meetings are held at regular intervals, and records maintained.
- Ensuring regular documented safety inspections are carried out across all of the company facilities and projects.
- Ensuring that all staff receive the required training and assessment in order to carry out their duties safely and competently, and undertaking regular gap analysis of the workforce.
- Providing advice and carrying out investigations to ensure the safety of the company's products and purchases where reasonably practicable.
- Regularly review and ensure testing of the Company's Emergency procedures for the organisation and its facilities and operations. Where required, raise recommendations for improvement with the involvement of both management and workers.
- Provide advice and support regards preparation of RAMS and any other Safe Systems of Work within their capability.
- Maintain and facilitate a company improvement program, and be a positive driver for continuing improvement and best practice within the business.
- Ensure all health and safety documents are retained and effectively distributed in accordance with core elements of the relevant standard(s).
- Maintaining company accreditations (e.g. BS 8555, SSIP schemes) and liaising with accreditation bodies regards surveillance audits and submissions.
- Supporting the management of change process within the business to promote and support an ever-improving positive Health and Safety culture.
- Setting an example and maintaining enthusiasm by their own behaviour, professional conduct and involvement in health and safety matters.

Contracts Managers

The Contracts Managers have delegated duties to act on behalf of the other directors for the following;

- Determining the principles, standards and the organisational requirements to be observed in fulfilling this policy and ensuring that this policy is effectively implemented.
- Ensuring that adequate consideration is given to all health and safety aspects in the planning, implementation and control of external site operations, to include

deliveries, offloading, safe storage, crane lifting operations and plant movements, working at height, steel erection, and change management.

- Preparation of worksite Safe Systems of Work, to include detailed site-specific RAMS, lifting plans, rescue plans, COSHH assessments, HAVS and Noise assessment and any other relevant controls required for each specific project (e.g. Traffic management plans and offloading plans).
- Ensuring that persons put to work on behalf of MOU (both sub-contractors and staff) are suitably trained, experienced and capable, and therefore deemed competent to undertake the specific tasks required of them, and that they receive a full project and task specific RAMS briefing prior to starting work.
- Managing the change process and issuing RAMS addendums to the safe system of work where the work method needs to adapt or change as works progress.
- Ensuring regular documented safety inspections are carried out on their appointed sites / projects.
- Ensuring that through the respective senior staff and liaison with project Principal Contractors (PCs) that;
 - The services and products they are responsible for are safe and without risks so far as reasonably practicable.
 - Information, guidance or advice is made available to those persons involved, so they may handle, transport, store, use and dispose of products and materials safely.
 - No member of the public or any third party is exposed unduly to hazard or risk resulting from activities on the company property or any of their external sites.
 - Our site operations present no danger or nuisance to the public, such as provision of adequate exclusion zones / boundaries, and no excessive noise, or dust and fumes are produced.
 - That site teams undertake and record all the required safety checks and briefings as required by MOU and the Principal Contractor (e.g. daily plant and equipment checklists, daily briefings, Tool box talks, RAMS revisions, Pont of Work RA's, etc)
- Liaising with Principal Contractors and Clients regarding site activities, Project sequencing of MOU activities, and subsequently preparing controlled Safe Systems of Work for our on-site activities.
- Liaising with Principal Contractors and other appointed trades to ensure site access, storage space, temporary works (e.g. crane mat), ground conditions and exclusion zones are provided to a suitable and safe standard.
- Ensuring that Principal Contractors provide adequate welfare facilities, security arrangements and a site-specific safety induction for our teams, and that site conditions are adequate for us to safely mobilise and start work.
- Setting an example and maintaining enthusiasm by their own behaviour and involvement in health and safety matters.

Health and Safety Advisors (Internal and external)

NFU insurance also provide the company with independent H&S advice and support where required. They may be contacted on 01291 672715.

Other external representatives may also be employed to assist the SHE Manager to manage the company H&S requirements.

The company has also internally recruited a H&S Officer to be trained and developed to further assist the SHE Manager in the EHS requirements of the company.

The MOU Safety Officer will support the SHE Manager to fulfil the needs and requirements of the company.

Their responsibilities include;

- Providing additional help and advice to enable all levels of management to discharge their responsibilities under this and its accompanying documents, in accordance with the Health and Safety at Work Act, and all other relevant legislation (including Environmental requirements).
- Carrying out safety inspections, audits, surveys at all locations and report with recommendations to the appropriate manager.
- Liaising with all relevant inspectorates, Public Bodies, Trade Associations, Institutes and Societies to provide the most effective advisory and consultative service on safety matters.
- Conducting regular Fire and First Aid checks around our facilities, including Fire drills.
- Preparing safety bulletins and conducting safety Tool box talks to staff.
- Advising on statutory requirements and other health and safety related matters when new plant or equipment is being introduced or existing plant is being modified.
- Provide additional resource and support to the business as part of its on-going improvement program.
- Assist in accident & incident investigations if required (where agreed).
- Assistance in the preparation and attendance during safety and environmental external inspections and audits.
- Setting an example and maintaining enthusiasm by their own behaviour and involvement in health and safety matters.

Works Managers

The Works Managers (Usk and Pontypool factories), are responsible for;

- Ensuring that this policy and other relevant safety policies are implemented to achieve the highest possible standard of safety for all persons on the premises under their control.
- Ensuring that all those responsible to them understand and discharge their responsibilities and duties in accordance with the Health and safety etc. Act 1974 and other relevant legislation.
- Ensuring that any person working within their facility is adequately trained, deemed competent and subsequently authorised to perform their tasks safely.
- Ensuring that evacuation and emergency procedures are maintained for their respective facility, and are communicated to all staff and visitors.
- Ensuring all machinery and equipment at their facility is fit for purpose, adequately guarded and adequately maintained so as not to present any additional risk to workers.
- Ensuring that all members of staff and contractors working at MOU facilities receive a Worker / Visitor induction and are fully briefed on the relevant risk assessments for the tasks they will be undertaking.

- Any persons working on or within buildings at MOU facilities are made aware of the Asbestos register, and review its contents in relation with the work undertaken.
- Ensuring that all buildings, plant, equipment and systems of work are safe and operate within the requirements of relevant health and safety legislation and MOU procedures.
- Liaison with the SHE Manager regards the production or review of task specific risk assessments for any new machinery or process, or when a process is changed.
- Liaison with the safety committee and others as appropriate, on all matters appertaining to safety and environmental controls.
- Acting as the Quality lead for all manufacturing activities conducted at their facility.
- Maintaining good housekeeping and general site tidiness in all working areas.
- Ensuring that articles and substances supplied on site are free from risk as is reasonably practicable.
- Ensuring your operations present no nuisance to the public, such as excessive noise, dust and fumes.
- Ensuring that any refurbishment, repair or modifications to the factory / site under their direct control is conducted in a planned and safe manner (completion by trained & competent persons, RAMS in place and controls implemented)
- Ensuring that adequate consideration is given to health and safety aspects in the planning, implementation and control of operations, so that those operations will be carried out safely.
- Monitoring of the general operation and effectiveness of this safety policy.
- Ensuring all registers are maintained and kept available for inspection by the relevant authorities.
- Setting an example and maintaining enthusiasm by their own behaviour and involvement in health and safety matters.

Maintenance Manager

The Maintenance Manager covers all aspects of the Usk and Pontypool factories, and is responsible for;

- Ensuring that this policy and other relevant safety policies are implemented to achieve the highest possible standard of safety for all persons conducting maintenance activities at MOU facilities.
- Ensuring that all those responsible to them understand and discharge their responsibilities and duties in accordance with the Health and safety etc. Act 1974 and other relevant legislation.
- Ensuring that all sub-contractors and MOU staff working in a maintenance capacity at any MOU facility is adequately trained and deemed competent to perform their tasks safely.
- Ensuring contractors working at MOU facilities receive a Visitor induction and provide and are briefed on the relevant risk assessments for the tasks they will be undertaking.
- Liaise with the Works Managers to ensure any Maintenance contractors working on or within buildings at MOU facilities are made aware of the Asbestos register, and review its contents in relation with the work undertaken.

- Will maintain an up-to-date maintenance / asset register for all company vehicles, machines, items of plant and equipment, and ensure they are regularly inspected and kept in a state of good repair.
- Will arrange for any damaged or faulty equipment to be isolated or made safe until a repair or replacement can be organised, within a prompt and timely fashion wherever possible.
- Will liaise with our external inspection agencies regards legislative inspections and ensuring that ongoing compliance is maintained to the required inspection timescales (e.g. LOLER, LEV, Pressure system inspections, etc).
- Advising the MD regards capital expenditure for new equipment, and liaise with the SHE Manager regards Safe Systems of work for new or modified machinery.
- Setting an example and maintaining enthusiasm by their own behaviour and involvement in health and safety matters.

Supervisors / Foreman / Checkers / Snagging Supervisors

Responsible for ensuring that:

- The employees under your control fully understand and observe all aspects of Health and Safety policies and procedures, including the workshop / site First Aid & Fire emergency arrangements.
- Ensuring that all employees under your control are instructed regarding the provision, location and correct use of safety equipment and making practical and reasonable effort to ensure that employees use the safety equipment (e.g. PPE, LEV, Fall protection, spill prevention, etc)
- Ensuring that employees under your control are instructed regarding the provision, location and use of first aid and fire equipment.
- Ensuring that any matter concerning health and safety brought up by any employee under your control is communicated to the relevant member of management if you cannot effectively deal with it.
- Ensuring that all employees under your control are instructed concerning relevant safe systems of work relevant to their activities.
- Ensuring that all employees under your control are adequately trained and instructed to perform all tasks required of them and are aware of all known hazards which may exist within the operation of those tasks.
- Ensuring that all accidents and/or dangerous occurrences, which occur within the area under your control, are investigated, reported and recorded as detailed in the Accident Reporting Procedure.
- Ensuring and conducting all routine monitoring procedures in all work areas under your control as and when required by senior management.
- Ensuring that all areas under your control are maintained in a condition that is safe and without risk to health and that any defective equipment or facilities reported are, where necessary, taken out of use until repaired or replaced or appropriate action taken.
- Maintain a level of safety surveillance in your work area and highlight or address any unsafe conditions, actions or behaviours to management.
- Ensuring that all employees safely handle and store hazardous substances in accordance with established rules and procedures.

- Setting an example and maintaining enthusiasm by their own behaviour and involvement in health and safety matters.

Employees (workshop and site snaggers)

Employees are responsible for;

- Ensuring you read and understand the Company Health and Safety Policy and they carry out their work in accordance with its requirements.
- Using the correct tools and equipment provided and keep them in good condition.
- Wearing all safety clothing and equipment provided correctly and as required in any documented safe system of work for the task at hand (workwear, PPE & RPE).
- Ensuring any defect or damage to plant or equipment is reported to the manager or supervisor.
- Always working in a safe manner and not taking unnecessary risks that could endanger yourself or others.
- To be familiar with workshop / site First Aid & Fire emergency arrangements, and to ALWAYS adhere to the evacuation protocols when required.
- Do not disregard, bypass or disable any safety devices of safe systems of work for personal gain or to save time in completion of a task.
- Do not maliciously damage or tamper with any equipment or machinery.
- Ensuring you do not use plant or equipment for work in any manner for which it was not intended for, if it is damaged, or if you are not trained, experienced and authorised to use it.
- Reporting any injury to yourself, which results from an accident at work, even if the injury does not stop you from working.
- To adhere to the requirements of the MOU Drug & Alcohol Policy, and to fully cooperate with company representatives regarding random or “For Cause” Drug and Alcohol testing as per the D&A policy.
- All staff are also required to advise the Company of any medical conditions or medications they are taking which could have a potential impact on their safety or others whilst at work.
- To ensure that they clock in and out at shift start and end (to assist with roll call in the event of a fire). Site staff are reminded that signing in and out of construction sites is a mandatory requirement under the CDM Regulations.
- Ensuring dangerous working, practical jokes or “horseplay” does not take place.
- Suggesting safer methods of working.
- Site operatives are also required to adhere to all the site rules relevant to the Principal Contractor for the construction site, project or facility they are working at. This also includes site signing / clocking requirements when entering and leaving the site.

Office / Administration Staff

Office staff are responsible for the following;

- Ensuring they read and understand the Company Health and Safety Policy and they carry out their work in accordance with its requirements.
- To use the correct office aids and materials, making full use of the safety equipment, devices and procedures.

- To ensure that equipment provided in the interests of health, safety and welfare is not misused or abused.
- To be familiar with office First Aid & Fire emergency arrangements and to ALWAYS adhere to the evacuation protocols when required.
- To report to their supervisor all defects in office machinery, equipment or fittings and not to attempt electrical or any repairs to equipment.
- To report to their supervisor or safety representative any unsafe or unhealthy working situations observed.
- To report all accidents, however minor, to the office administrator or first aider.

Sub-contract labour

The company employs the services from of several sub-contract labour sources, including Agency workers (primarily in the production facilities), and self-employed erectors / sub-contract erection gangs for the steel erection activities conducted on external construction sites. Occasionally, a package of work may be fully sub-contracted (e.g. site package such as metal decking or cladding)

All agency and sub-contract staff will be required to work within the same safety framework and standards as our permanent staff, dependant on their level of responsibility (Manager / Supervisor / Employee).

Agency staff will be treated no differently from the directly employed staff regards provision of job specific training, task specific PPE and provision of OH surveillance medicals.

Sub-contractor companies will be expected to comply to MOU standards as follows;

- To be aware of the Principal Contractor's requirements and the methodology of safe working.
- To provide suitable Risk Assessments and Method Statements to the MOU Contract Manager and the Principal Contractor for assessment and approval prior to commencement of works.
- To have adequate knowledge of how to discharge said requirements, to ensure compliance with site safe methods and systems of work.
- To fully comply with any and all site rules and instructions put in place on any site as stipulated by a Principal Contractor whilst working on behalf of MOU.
- In respect of the above to comply with safe working systems and arrangements as necessary so as to maintain order and safe working at all times, and adequately communicate these requirements to their workforce.
- To ensure that all their operatives who attend site have received the correct training and levels of competence required for the specific site hazards and / or job activity (e.g. CSCS tested, Plant licences, etc).
- To ensure operatives receive a Site induction for the location where they are working – PC site induction for construction sites, or a MOU Contractor induction if working at a MOU facility.
- To organise their operatives and employees so that work is carried out with due care.

- To stop and make site management aware of any unsafe conditions or practices observed.
- To immediately report any Accidents, Near Misses, Dangerous Occurrences, Hazards, unsafe conditions or unsafe actions to the site management team.
- To ensure key compliance with the company's safety requirements through the expectations set out both within contract and work instructions as may be given from time to time throughout the duration of the contract.
- To adhere to the requirements of the MOU Drug & Alcohol Policy, and to fully cooperate with company representatives regarding random or “due cause” Drug and Alcohol testing as per the D&A policy.
- To comply with the emergency arrangements for the facility (as communicated at induction), and to ALWAYS adhere to the evacuation protocols when required.

Arrangements

Consultation

Management considers communication between employees at all levels to be an essential part of effective health and safety management.

Consultation shall be facilitated by means of Safety Committee meetings as deemed necessary. Their purpose being to provide a forum in which information may be conveyed and employees' questions on health and safety issues addressed. Additionally these meetings shall provide an opportunity to assess the continuing effectiveness of the policy.

Designated members of shop floor staff will be requested to represent the workforce and attend these meetings to raise any issues and also feedback information to their colleagues.

Communication

Management will communicate to employee's their commitment to health and safety, ensuring that employees are familiar with the contents of the company health and safety policy, and safe systems of work.

This will be conducted via regular Tool Box talks, safety briefings and published safety bulletins, as well as formal briefings of activity Risk Assessments, relevant company policies and the company induction specific to the facility they are working at.

Co-operation and Care

Effective Line Management depends upon co-operation between employer and employee at all levels. To this end all employees are expected to co-operate with the safety adviser/employee representative of safety and to accept their legal duties. Disciplinary action may be taken against any employee who violates safety rules or who fails to perform his/her duties.

Employees have a duty to take all reasonable steps to preserve and protect the health and safety of themselves and all others affected by their actions.

Demonstrating SHE compliance

As well as the arrangements set out in this policy document, MOU maintain a number of accreditations under the Safety Schemes in Procurement (SSIP) scheme. This helps to demonstrate that our safety and health policies, procedures and systems have been vetted and audited to an industry recognised level of safety compliance and competence.

Current ongoing SSIP schemes and other accreditations in place include:

- Constructionline Acclaim (SSIP)
- SMAS (Safety Management Advisory Services) Worksafe (SSIP)
- Constructionline Gold accreditation
- BS 8555 accredited Environmental Management System
- BS EN 1090 Factory Production Control Quality certification to Execution Class 3

Safety Training

Safety training is regarded as indispensable in achieving an effective health and safety environment. It is essential that every employee in the organisation be suitably trained and deemed competent to perform his/her job effectively and safely.

All employees shall be trained in safe working practices and procedures prior to being allocated any new role. Training shall include formal instruction and practical experience for the task / activity, advice on the correct use and maintenance of PPE appropriate to the task, basic maintenance requirements, the hazards associated with the task through the Risk Assessment, plus the formulation of emergency contingency plans.

Dependant of the complexity of the activity and level of experience and training required, a workplace mentor or further assessment may be required until a worker is deemed fully competent. No worker shall be put to work to perform any activity unless they have received adequate and specific training and instruction, and been deemed competent and authorised by the company to complete the specific activity.

Each job role within the company will require a set of “core” training requirements in order for that designated worker to safely fulfil their role and be deemed fully competent. Training records are recorded using the “My Compliance” software platform, with records updated by the internal trainers and overseen by the SHE Manager.

The company has invested in the development of our own staff to perform in-house training – this covers use of over-head cranes, training and assessment in Front load and Side load fork trucks, manual handling, abrasive wheels, welding and oxy-fuel burning / cutting.

The Works / Contract Managers have the responsibility for safety training of their staff and the SHE Manager oversees that the Occupational Health and Safety training records are kept up to date.

Provision of safety training will be constantly reviewed and periodically refreshed and / or updated relevant to changes in job role, additional tasks, work practices / methods and following any incident corrective actions. General refresher training will take place every 3-5 years.

Risk Assessment

All activities undertaken by the company will be subject to a task specific Risk Assessment as required by the Management of Health and Safety at Work Regulations 1999. Also refer to MOU Policy document [MOU-POL-06: Risk Management](#).

Repetitive workshop activities will be assessed and communicated to relevant staff via a combined Risk Assessment and Safe Work Instruction (SWI) document. These will be periodically reviewed and updated as per timescales dependant on the level of risk, or following any changes to work practices, work method, or following any accidents or incidents.

One-off activities within the manufacturing facilities will also be subject to risk assessment and determination of a method statement and safe system of work before prior to the activity starting. Detailed assessments will be completed by either the H&S team or the Contract Managers, with lower risk activities being assessed via the “Point of Work” risk assessment system (POWRA - Use form [MOU-FM-030](#))

All external site activities will have details Risk Assessments and Methods Statements (RAMS) completed by the MOU Contracts Managers. These may also include Lift plans for Mobile Crane and Telehandler lifting, MEWP Rescue plans and emergency procedures. These will usually be submitted for approval by the project PC prior to works commencing.

Workplace and Worksite Inspections

It is Company policy to comply with the Workplace Health, Safety and Welfare Regulations (WHSWR).

Members of the H&S team and / or Contract Manager and nominated representative of the department being inspected shall conduct regular inspections of the workplace and our external site activities. Additionally, inspections shall be conducted in the relevant areas whenever there are significant changes in the nature and/or scale of operations.

Workplace inspections shall provide an opportunity to review the continuing effectiveness of the policy and to identify areas where revision of the policy may be necessary.

Regular construction site inspections may be required by our Clients / PCs to demonstrate ongoing surveillance and compliance, but will also be conducted on smaller sites and projects to further demonstrate compliance and good practice of our site erection and snagging teams.

Work Equipment

It is Company policy to comply with the Provision and Use of Work Equipment Regulations (PUWER). The Company shall endeavour to ensure that all equipment used in the workplace is safe and suitable for the purpose for which it is used. All workers will be provided with suitable and sufficient information and training to enable them to use work equipment safely and correctly.

All work equipment shall be maintained in good working order and repair. All workers shall be provided with such protection as is adequate to protect them from dangers occasioned by the use of work equipment. All work equipment shall be clearly marked with health and safety warnings where appropriate.

Electrical Equipment

All fixed electrical installations will receive a fixed installation inspection (EICR) no later than every 3 years (as per requirements for industrial installations). Office installations require a 5-year inspection, but these will be completed in line with the corresponding factory inspection for that location. All electrical works will only be conducted by trained and competent operatives and contractors, and any notified issues will be rectified in a timely manner.

Portable Appliance Testing (PAT) will be periodically conducted on all portable electrical equipment, both at our production facilities, and those used by MOU site operatives. The timescale for testing will be representative of the risk of damage from the work environment where the appliance is being used (e.g. Site tools tested every 6 months, workshops annually, offices 1-2 years).

Welfare

The provisions of the Workplace (Health, Safety and Welfare) Regulations with regard adequate provision of toilets, washing, showers (where applicable), changing rooms, clothing storage/drying room, rest/mess rooms, hot and cold-water supply and drinking water will be complied with and the facilities kept clean and in good condition.

The company will also advise Clients and Principal Contractors of their duty and obligation to provide adequate welfare facilities on external sites for our site-based staff and contractors as required under the Construction (Design & Management) Regulations 2015 (CDM). (*also see Construction Work*)

Pressure vessels & Local Exhaust Ventilation (LEV)

All Pressure systems (compressors, accumulators & air receivers) are regularly inspected as per the requirements of Pressure Equipment (Safety) Regulations 2016.

All LEV systems are also regularly inspected and serviced as per the requirements of Schedule 9 of the COSHH regulations. The LEV systems in place at MOU facilities include weld extraction units, solvent extraction, shotblast filtration and Plasma cutter extraction.

Both LEV and pressure systems at MOU are currently serviced and inspected by specialist contractors appointed via our insurance assessors.

Personal Protective Equipment (including RPE)

It is Company policy to comply with the Personal Protective Equipment at Work Regulations (PPE).

All employees (including contractor staff working at MOU facilities) who may be exposed to a risk or hazard whilst at work shall be provided with suitable and sufficient PPE. All PPE is provided free of charge.

Correct PPE **must** be worn in line with the requirements of any Mandatory Signs that are posted within operational areas. (A Mandatory Sign is designated as White lettering on Blue background).

All personal protective equipment provided by the Company shall be;

- Properly assessed prior to its provision.
- Maintained in good working order.
- All employees shall receive comprehensive training and information on the correct use, maintenance and purpose of the equipment.
- The Company shall endeavour to ensure that all personal protective equipment provided by them shall be used properly by its employees.
- All employees have a legal duty to report any damage or defect of their PPE to their supervisor or Works Manager.

RPE (Respiratory Protective Equipment), shall also be provided by the company free of charge as determined per the requirements of a Risk or COSHH assessment. Hazards where the use of RPE would be required include use of solvents (paint spraying), exposure to weld fume (MIG welding) and working with silica dust (concrete drilling on site).

In all circumstances the RPE will be provided to the employee / worker and sufficient training and briefing given regards the hazard, the correct use and upkeep of the RPE. Where required, face fit testing will be completed by a qualified person.

(Note: Positive air-fed RPE where face fitting is not required may be provided at the Company's discretion, in proportion to the risk of the operation).

Manual Handling Operations

It is Company policy to comply with the Manual Handling Operations Regulations. Please also refer to MOU documents [**SWI 002 – Safe turning of Steel sections**](#) and [**SWI 020 – Manual handling**](#).

- Manual handling operations shall be avoided as far as is reasonably practicable – Wherever possible, suitable mechanical means will be provided (e.g. bespoke cylinder lifter trolleys for gas cylinder lifting and transportation, section turning bars, etc)
- Where it is not practicable to avoid manual handling operations, an assessment of the operation shall be made considering the task, the load, the working environment and the capability of the individual concerned.
- The assessment shall be reviewed if there is any reason to suspect that it is no longer valid.
- All staff identified as having to perform MH duties will receive manual handling training which will be periodically refreshed.

- Where a specialised or highly repetitive manual handling activity is identified, the company will employ the use of the HSE MAC, ART and RRAP tools to complete bespoke assessments (e.g. ART assessment for a repetitive task such as MIG welding or a RAPP assessment for pushing / pulling such as transporting gas cylinders by trolley).
- The company has set a maximum single person manual lifting limit of 20Kg.

Work at Height

It is Company policy to comply with the Work at Height Regulations.

- The company will strive to eliminate / reduce working at height as per the Hierarchy of Control So far as is reasonably practicable (SFARP).
- Safe access and egress will be provided in addition to suitable edge protection, fall restraint and fall arrest equipment.
- Training in its use will be provided and updated as required.
- The company has a policy in place to prohibit the entry of persons onto the rear of lorry trailers, with the majority of loading and offloading activities being conducted by Fork lift trucks and scissor lifts. Where this cannot be completed, activities are conducted with a man-safe fall arrest system on sites, and a bespoke access system at our factory facilities.
- Material suppliers and transport contractors have been notified that any unprotected Work at height at MOU facilities by drivers is strictly prohibited.

Walkways and Plant / person interface

- All aisles and passageways must be kept clear.
- Wet surfaces should be either clearly marked with warning signs or covered with non-slip material.
- Where forklifts, trucks or other moving machinery is operating, unauthorised personnel should not be allowed access.
- Warning signs should be prominently displayed and machine operators should exercise extreme caution.
- Equipment must be properly stored so that sharp edges do not protrude into walkways.
- Changes in floor elevation and ceiling height must be clearly marked, as must passageways near dangerous operations such as welding, heavy materials lifting or machinery operation.
- Aisles and passageways must be kept clear of debris, floor storage and electrical cables.
- Provision for clearing icy surfaces in winter weather will be established.
- Each production facility has a mandatory speed limit of 5mph, and wherever possible, site plant is restricted to this maximum speed.
- Hi visibility clothing is required to be worn in yard areas at our production facilities.
- Designated safe walkways and crossing points will be established at each producing facility, in line with the Transport Risk Assessment prepared for each site.

- MOU facilities operate a “Thumbs Up” safety regime to ensure pedestrians and plant acknowledge each other in order to pass safely where physical segregation cannot be maintained.

Lifting and moving (including loading and unloading)

All Lifting operations must be subject to a lifting risk assessment as per the requirements of the Lifting Operations and Lifting Equipment Regulations (LOLER)

- Where required (depending on the activity, situation and complexity) a lift will be subject to a lift plan – all site lifts by mobile crane or mobile plant will ALWAYS be planned by a qualified Lifting Appointed Person.
- When planning and organising crane lifts, please also refer to MOU Safe work procedure [MOU-PR-05 – Crane lifting and planning Procedure](#).
- Lifting and moving of objects must be done by mechanical devices rather than by manual effort wherever reasonably practicable.
- A Loading RA and SWI has been prepared for trailer loading activities at our production facilities, and also to cover external site activities [SWI 001 - Lorry loading / unloading](#).
- The equipment used must be appropriate for the lifting or moving task.
- Trained and competent personnel only must operate such devices.
- Employees must not be required to lift heavy or bulky objects, which overtax their physical condition or capability.
- Employees are to receive OH Crane / Slinger training before being authorised to operate the overhead pendant cranes or sling steelwork / loads in the workshop.
- The company shall ensure that periodic maintenance is completed on lifting devices, and that the required statutory inspections are completed as per the requirements of LOLER.

Tools, Plant and Equipment Maintenance

The company shall ensure all equipment supplied is fit for use, regularly maintained and operatives trained in their use as per the requirements of the Provision and Use of Work Equipment Regulations (PUWER), and where applicable, LOLER.

- Company machines, items of plant and tools are to be used only by qualified and authorised personnel. It is the responsibility of the supervisor to determine who is qualified to use specific tools, plant and equipment.
- All responsible employees shall be responsible for ensuring that all tools and equipment used for company purposes are in a good condition.
- Faulty or improperly used tools are a safety hazard. Any tools which are defective or worn out should be reconditioned or replaced.
- When not in use tools should be stored in a dry and safe condition.
- No tool should be used without the correct shield, guard or attachment recommended by the manufacturer.
- Approved personal protective equipment must be properly used where appropriate.
- Employees are prohibited from using any tool or equipment, which is defective or faulty in any way or for any purpose other than its intended use.

Construction Work

It is Company policy to comply with the Construction (Design & Management) Regulations (CDM) 2015. Please also refer to MOU policy document [MOU-POL-05 – CDM 2015 Policy](#).

- The company conducts site specific risk assessments for each site-based task, from which a method statement is developed which forms the basis of a safe system of work.
- Employees will also undergo a site safety induction provided by the principal contractor / client, prior to being permitted to commence any work activity on site.
- The Contracts Manager and SHE Manager / Safety Advisor will inspect our sites on a regular basis to ensure that the regulations are being complied with by MOU staff, our sub-contractors, the principal contractor and the client.

It is noted that under the role requirements of CDM 2015, that Morgans of Usk Ltd will only ever act as a “Contractor” on site, while working under a Principal Contractor appointed by the Client to oversee the construction phase of works.

The company will fulfil the defined duties of a contractor under the Regulations, and proactively cooperate with the PC and other contractors to ensure staff health and safety is maintained to the highest standards.

[MOU-POL-05 \(A\) - CDM 2015 Guidance notes on stakeholder duties](#), is a guidance document appendix to our CDM policy, which sets out these roles, but also acts as an aide memoire to remind our Clients of their own duties under the CDM Regulations.

Design Considerations

Under the CDM Regulations, MOU may perform design duties on steel frames. These will usually only be conducted internally on steel work connection designs, with the majority of schemes designed by the Client’s appointed designers.

Whenever a design input is required on a project, the work is conducted by a qualified design member of staff, and a Design Risk Assessment for the project is also completed. This is to ensure all aspects of potential risk have been identified and eliminated for manufacture and construction at the design stage.

The Building Safety Act

In relation to the updated legislation relating to fire controls on buildings MOU can confirm our compliance as follows;

- MOU perform design calculations on steelwork connections and base connections when requested by our clients. We also occasionally perform Design and Build contracts, mainly on portal frame structures. These are designed to the required UK standards for structural steel which comply with the required Building Regulations.
- Rules for the design of steelwork are given in Eurocode 3 Design of steel structures. Within Part 1-1 of that Eurocode (BS EN 1993-1-1), the following basis assumption is stated: fabrication and erection comply with BS EN 1090.
- MOU are accredited to BS EN 1090 to Execution Class 3 to cover our design, fabrication, painting and erection activities of structural steelwork.

Display Screen Equipment

It is Company policy to comply with Display Screen Equipment Regulations (DSE), and shall conduct risk assessments of all workstations.

- The risks to users of DSE shall be reduced to the lowest extent reasonably practicable.
- DSE users shall be encouraged to take periodic breaks from their workstations.
- Eyesight tests shall be provided for DSE users upon request.
- Where necessary DSE users shall be provided with the necessary basic corrective equipment, i.e. spectacles.
- All DSE users shall be given suitable and sufficient training on the health and safety aspects of their work and shall be given further training and information whenever the organisation of the workstation is substantially modified.

Control of Substances Hazardous to Health, (C.O.S.H.H.)

It is company policy to comply with the Control of Substances Hazardous to Health Regulations (COSHH).

- A COSHH risk assessment shall be conducted of all work involving exposure to hazardous substances. The assessment shall be based upon manufacturers and suppliers' health and safety guidance, our own knowledge of the work process on how and where the product will be used and any other professional documentation deemed applicable.
- The Company shall ensure that exposure of workers to hazardous substances is minimised and adequately controlled.
- All workers who come into contact with hazardous substances shall receive comprehensive information and training on the health and safety issues relating to their type of work via briefed COSHH assessments.
- Assessments shall be reviewed periodically, whenever there is a substantial modification to the work process, if the material is substituted, or if there is any reason to suspect that the assessment may no longer be valid.
- Any PPE / RPE required in order to protect workers as per the COSHH assessment is provided, and the correct use of the PPE is managed and monitored by supervision / management during the activity.
- Air monitoring will be conducted and periodically reviewed at both of our manufacturing facilities in relation to control of weld fume and solvents.

Noise

The Company will perform Noise monitoring and assessment at its production facilities and review noise data for its portable tools. Noise exposure will be Risk assessed accordingly for both the production facilities and our site activities.

Hearing PPE has been risk assessed as sufficient and adequate for the noise hazards identified, and is readily available. OH monitoring is also in place for all operatives regards risk from noise induced hearing loss, as per the requirements of the Control of Noise at Work Regulations (*See also Occupational Health surveillance*).

Ongoing improvements to reduce worker noise exposure include investigation into improved grinding mediums, and reducing grinding requirements at the design stage.

Asbestos

If materials containing asbestos are cut or damaged, minute fibres of asbestos can be released into the air. If adequate precautions are not taken, these fibres can be inhaled, creating a risk of developing cancers and other serious asbestos related health conditions in later life.

The majority of MOU operations (fabrication and erection of steelwork) will not have any risk of asbestos exposure to employees or sub-contractors.

The company has in place an Asbestos Management Plan, and both production facilities have been subject to a full asbestos survey as per the requirements of the Control of Asbestos Regulations (CAR). Asbestos materials have been identified in some locations at our premises and have been identified as lower risk Chrysotile (white) asbestos only. As a result of this, all staff have been briefed on the material locations as per the asbestos register.

No maintenance or installation works in these areas are conducted without first reviewing the register, and works on asbestos is only undertaken by trained and qualified persons. The site asbestos register shall be made available to any external contractors who are employed to perform works at the site (e.g. Fire contractor, electricians, air conditioning, etc)

Any refurbishment works are only performed after a full demolition & refurbishment survey has been completed, and the materials removed via a licenced contractor.

The Company does retain a small number of Skilled trained (Cat B) operatives to undertake minor repairs for unlicensed and non-notifiable works (Chrysotile only). Any works will only be conducted with a task specific set of RAMS and control measures in place. All Skills training for asbestos is updated on an annual basis as per requirements in CAR 2012.

All asbestos materials removed from the site are via a licenced hazardous waste contractor, with the transfer note being retained for a minimum period of three years.

The company is continuing the process of removing ACM products from both our manufacturing facilities as part of on-going developments and site improvements. All removed products are logged on the Asbestos register for each facility.

Hand Arm Vibration

The company actively manages hand held vibration from hand held powered tools as per the requirements of the Control of Vibration at Work Regulations.

The company has assessed all vibrating tools in use by our operatives, and set daily working limits for each tool, which are communicated to workshop supervisors, and operatives, with exposures being measured and monitored, and excessive exposures investigated.

Ongoing improvements to reduce worker vibration exposure include investigation into improved grinding mediums, sourcing reduced / lower vibration equipment, reducing grinding requirements at the design stage, and education regards the correct tools to use (size of grinder for type of work undertaken – larger grinders have lower vibration, but heavier and more cumbersome to use). The Company has also invested in Reactec 3rd Generation monitoring equipment to more accurately measure the on-going exposures to or staff.

OH monitoring and surveillance is also in place for all operatives regards risk from hand vibration as per the regulations. This takes the form of regular screening, exposure monitoring and workplace medicals. (See also *Occupational Health surveillance*)

Please also refer to Safe work procedure [MOU-PR-02 – Management of HAVS](#) for more detailed information.

Fire Safety (Manufacturing facilities & offices)

The Company's fire safety policy and procedures take account of special fire hazards in specific areas of the workplace and, have been reviewed through regular Fire Risk Assessments conducted by qualified external inspectors.

The FRA will assist in ensuring the company's compliance with fire safety and prevention codes, for reviewing company practices and procedures, inspecting and testing firefighting, prevention and protection equipment and for advising on safe practices and procedures. The FRA at both facilities is reviewed and updated on an annual basis.

The person with responsibility for the maintenance and testing of fire alarms and firefighting equipment are the Works Managers.

All employees have a duty to immediately report any fire, smoke or potential fire hazards to the fire service (dial 999).

Site Address Usk works;

Morgans of Usk Limited,
Woodside Works,
Woodside Industrial Estate
Usk,
NP15 1SS.

Site Address Pontypool works;

Morgans of Usk Limited,
Ontario Works,
Pont Y Felin Road
New Inn,
Pontypool
NP4 0DQ

All employees have a duty to conduct their operations in such a way as to minimise the risk of fire. This includes only smoking in designated areas, keeping combustible materials separate from sources of ignition and avoiding unnecessary accumulation of combustible materials. The Works Manager is responsible for the provision and maintenance of fire prevention and detection equipment.

Supervisors are responsible for keeping their operating areas safe from fire, ensuring that their staff are trained in proper fire prevention practices and emergency procedures.

A site Emergency file will be prepared for each site, for presentation to the Fire Service in the event of a fire. This will include details of materials stored on site (e.g. flammable gases), details of asbestos materials, and locations of service isolation points (power and water), as well the location of the fire hydrants.

The local Fire Service is aware of and familiar with each of our facilities, and our controls and emergency procedures.

Dangerous Substances and Explosive Atmospheres Regulations (DSEAR)

Due to the nature of our operations with oxygen acetylene cutting during in the fabrication workshops, and the use of solvents and generation of dust in our paint shops, both manufacturing facilities are subject to annual DSEAR Risk Assessments.

An Acetylene Risk assessment is also in place as per legislation covering the safe use and required control measures for this material.

Fire & Smoke Detection Equipment

Smoke and heat detectors and manually operated fire alarm points are located at strategic positions throughout our facilities. All detectors are connected directly to the alarm systems at each facility, however, if a fire is visually detected, it is still the responsibility of **any** employee present to activate the alarm and evacuate the building.

Fire Alarms and emergency lighting are subject to formal periodic inspections by a qualified inspector, as well as documented regular checks performed by nominated members of staff.

Fire Fighting Equipment

Fire extinguishers are located at strategic points throughout the workplace. Employees are expected to tackle a fire themselves only if it would pose no threat to their personal safety to do so. If the situation is dangerous or potentially dangerous the employee should activate the alarm and evacuate the building immediately.

Fire blankets are also supplied in every welfare and kitchen area.

All extinguishers and fire equipment are regularly inspected to confirm fitness for use, and are also subject to a periodic annual inspection by a qualified inspector.

Note: All Fire Extinguishers have their nominated use listed above the station.

Fire Exits

Fire exits are located at strategic points throughout the workplace. Exit doors and corridors must never be locked or obstructed and are subject to documented periodic checks by nominated members of staff.

Site Fire controls and Risk Assessment.

As a designated Contractor under the designation in CDM 2015, MOU operatives will always abide by the mandated Fire controls as set out by the Principal Contractor on each project / site we attend.

All our staff and representatives will attend the PC Site induction to receive instruction in the Fire controls and emergency procedures for each site.

In general, MOU site activities involving steel erection do not pose any significant risk of fire, however, the exception to this would be Hot work activities undertaken by our snagging teams to rectify, repair or revise steel work on site. These hot works could include use of angle grinders, drilling metal sections, oxy fuel flame cutting, and concrete drilling of bases.

Wherever hot works will be required, MOU will seek authorisation from the PC prior to any hot works commencing, and agree all required controls as per the PC's Hot work permit system. In addition to the issued Hot work permit, all hot works will be risk assessed and documented in the project RAMS.

The majority of MOU operations are undertaken on the exposed 1st fix steel frame structure, with a low risk of fire spreading to other areas of the site. Where any modification works are required in finished buildings, enclosed spaces or high rise structures, a robust set of controls will be implemented with agreement with the PC which may include multiple fire watches, additional extinguishers, positioning of fire screens / blankets and segregation measures.

All MOU staff undertaking hot works will be briefed on the requirements of each permit, be trained in the use of Oxy fuel cutting, and also be Fire marshal trained.

Smoking

Smoking is not permitted in any enclosed workspace (office of factory), including work vehicles.

Smoking rules for construction sites as determined by the project PC will also be observed by our site staff (e.g. use of designated smoking areas).

Any staff member (or contractor) found to be in breach of the smoking rules will be subject to disciplinary action.

Emergency Evacuation Procedure

In the event of the fire alarm being activated, or in any other emergency situation (such as a bomb scare), all employees must leave the building by the nearest available exit and assemble at the designated assembly point for each facility.

Regular practice fire drills will be conducted to ensure employee familiarity with emergency evacuation procedures.

Accident and Incident Investigation

It is the policy of the Company to comply with the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR).

The Company sees accident and incident investigation as a valuable tool in the prevention of future incidents. In the event of an accident resulting in injury, or a Near Miss incident with significant potential for injury, a report will be submitted by the SHE Manager detailing:

- The Circumstances of the accident.
- The nature and (potential or actual) severity of the injury or damage sustained.
- Name of Injured party and employer.
- The time, date and location of the incident.
- The date of the report.
- Photographs or CCTV footage (if available) of the accident scene.
- Details of relevant training records, risk assessments and safe system of work in place at the time of the incident.
- Immediate and Root causes of the incident.
- Corrective and preventative actions to rectify the immediate situation and prevent a recurrence.

All eyewitness accounts will be collected as near to the time of the accident as is reasonably practicable. Any person required to give an official statement has the right to have a lawyer or trade union representative present at the Company's expense.

Tools or equipment relevant to the incident may also be required to be examined by an external party to determine an defects or faults.

The completed report will then be submitted to and analysed by the Safety Committee who will attempt to discover why the accident occurred and what action should be taken to avoid a recurrence of the problem. All incidents, accidents and Near misses are recorded using the "My Compliance" software platform.

All reports detailing serious accidents or incidents shall be submitted to the company lawyers who shall advise on liability proceedings and quantum of damages. They shall also submit a report to the company's insurance risk advisors for assessment.

A follow up report will be completed after a reasonable period of time examining the effectiveness of any new measures adopted.

Where deemed necessary, and where significant learning points need to be communicated, a safety bulletin will be raised by the SHE Manager and communicated to all relevant staff and supply chain partners.

For further information please also refer to the Safe work procedure [**MOU-PR-04 – Accident, Incident & Near Miss reporting Procedure.**](#)

Near Misses / Safety Observations

The Company promote the reporting of Near Misses and Safety Observations (including hazards, unsafe actions and conditions). Recording and investigation of these occurrences is a vital positive indicator of safety culture and performance, and is actively promoted as part of the MOU Continual Improvement plan.

These are also recorded using the My Compliance platform, and can also be recorded on the system using a phone App.

Accident Procedure & provision of First Aid

First aid stations are located in the main offices and in the main workshops at both facilities. They are clearly marked and are easily accessible by all employees during all working hours. Various personnel holding a current first aid certificate are responsible for the proper use and maintenance of each first aid station.

A register of qualified first aiders will be kept by the company and a First Aid Risk Assessment has been conducted for both production facilities. It is noted that there are numerous First Aiders trained within the company and to cover our site gangs to ensure more than adequate provision.

Due to the nature and size of components produced in our workshops, shop floor First Aiders have also received additional major trauma First Aid training.

Site Snagging teams also have an Emergency First Aider trained as part of each gang, and provision of first aiders is requested of our sub-contract erection gangs. Provision of first aid facilities and site procedures will be determined on each site by the relevant Project PC and agreed at the project handover stage. Our site representatives will be advised of these arrangements at site induction.

In an Emergency situation, call 999, with First Aiders dealing with any casualties until the Emergency services arrive.

The nearest A&E departments are as follows:

- **MAJOR INCIDENT** - The Grange University Hospital, Caerleon Road, Llanfrechfa, Cwmbran NP44 8YN
- **MINOR INJURIES (USK WORKS)** – Nevill Hall Hospital, Brecon Rd, Abergavenny NP7 7EG.
- **MINOR INJURIES (PONTYPOOL WORKS)** – The Royal Gwent Hospital, Cardiff Rd, Newport. NP20 2UB.

It also noted that an Emergency defibrillator (AED) has been installed at both of our production facilities.

The Works Managers are responsible for reporting all workshop incidents or accidents, the Contract Managers for site incidents and accidents. Reporting is to the SHE Manager (for investigation) and the Managing Director.

Accident records are compiled and stored by the SHE Manager who is responsible for reporting cases of accident and disease to the relevant enforcing authority under the RIDDOR regulations where applicable.

Occupational Health Surveillance

Where exposure to toxic or harmful substances, excessive noise or vibration is possible, in addition to assessing risk and implementing controls, site management ensures that appropriate health surveillance measures are undertaken in accordance with the company's procedures.

Apart from specific health risks raised by hazardous activities, the company operates an on-going OH surveillance scheme including all operatives and staff to measure general health and well-being as well as mandatory testing requirements. Items tested include;

- Blood pressure check
- Blood sugar
- Hearing test
- Balance test
- Height / weight / posture
- Lung function
- Skin check (regards condition, chemical exposure and allergies)
- Eye sight check (vision and colours)
- HAVS surveillance (hand condition, touch and grip strength)
- DSE assessments

From surveillance medicals, any identified issues will be followed up promptly with further OH testing (e.g. HAVS indicators, skin issues, or potential hearing loss), as per the relevant legislation. If required, any diagnosed reportable diseases will be reported as per the requirements of RIDDOR.

Morgans of Usk Ltd will conduct regular random Drug and Alcohol screenings in line with the MOU Drug and Alcohol Policy. Screening may also include “For cause” testing, follow up tests (following previous non-negative tests), and post incident tests. Please refer to [MOU-POL-04 – Drugs & Alcohol Policy & Procedure](#).

As part of the on-boarding and Induction process of new staff, an OH questionnaire is completed to highlight any existing medical issues or potential issues that could affect a new staff members safety and health of themselves, or the potentially the safety of others.

All staff are also required to advise the Company of any medical conditions or medications they are taking which could have a potential impact on their safety or others whilst at work.

Radon & Legionella

Radon is a naturally occurring radioactive gas which can cause lung cancer if present in large quantities. The Legionella bacteria can be present in water systems, and can lead to the respiratory condition Legionnaire’s Disease.

Radon assessments and testing have been completed at both of our office and manufacturing facilities, and testing and Risk assessments have been completed regards the presence of Legionella bacteria, and potential risk to staff and visitors. An annual inspection and servicing regime is also in place regards the number of Air conditioning units at our facilities.

Mental Health and employee support

Mental health includes our emotional, psychological, and social well-being. It affects how we think, feel, and act. It also helps determine how we handle stress, relate to others, and make healthy choices.

The company will endeavour to raise the profile of positive mental health with our workforce regarding communicating available support networks and providing support for any staff reporting MH issues. The Company policies such anti-bullying and harassment will also be upheld in order to help reduce incidences of work-place stress that can also influence positive mental health.

To further support mental health within the organisation, Mental Health First Aiders have been trained and appointed to cover both permanent facilities.

A Stress Policy has also been developed and issued in order to further promote and support positive mental health within the organisation.

Fatigue

The company will regularly monitor worker hours in relation to identifying potential incidences of worker fatigue. Where necessary, shift patterns may also be analysed for fatigue potential using the HSE fatigue calculator.

For travelling site workers, any projects where regular working from home base is in excess of 2 hours each way, the provision of lodging accommodation must be considered, or a reduction in the working day whilst on site.

The company will aim to ensure a maximum working day of 14 hours door to door, (apart from in exceptional short-term circumstances).

Young Persons

The company may employ young persons in trainee or apprentice roles – A Young Person is defined as anyone under the Age of 18 years old (16 or 17). Because of the relative inexperience and potential immaturity of younger workers, they are deemed to be of a much greater risk in the workplace.

Where any Young person is employed by MOU, or if required to work at any MOU facility as a sub-contractor, a suitable Young Person's Risk Assessment will be required to be put in place and adhered to. Any young persons will then be required to be always supervised, with lone working forbidden.

Note: Persons under 16 years of age will not be permitted to work in any MOU workshop, yard or site environment.

Working Environment

- Work sites must be kept clean and orderly.
- Work surfaces must be kept dry or appropriate steps taken to ensure the surfaces are slip-resistant.
- Spills must be cleaned up immediately. Absorbent granules are available.
- All combustible scrap, waste and debris must be stored safely and removed promptly.
- Combustible dust must be cleaned up with a vacuum system to prevent the dust from going into suspension. The accumulated combustible dust must be removed routinely.

- Metallic or conductive dust must be prevented from entering or accumulating on or around electrical enclosures or equipment.
- All oil and gas fired devices should be equipped with flame failure controls which will prevent flow of fuel if pilot lights or main burners are not working.

Occupational Health & Safety Rules

The following safety rules must be complied with by all employees of the Company during all working hours. Failure to do so could result in disciplinary action.

GENERAL RULES

All employees should be aware of, respect and adhere to the rules and procedures contained within this policy statement.

- All employees shall immediately report any unsafe practice or condition to their supervisor or line manager.
- Suitable clothing and footwear shall be worn at all times.
- Personal protective equipment shall be worn wherever required as per the activity risk assessment.
- All employees are expected to attend departmental safety meetings.
- Any person under the influence of alcohol or any other intoxicating drug, which might impair motor skills or judgement, whether prescribed or otherwise, shall not be allowed on site. Disciplinary action may also be taken against the individual.
- Smoking is prohibited within any of the company offices, workshops, buildings or vehicles.
- Horseplay, practical joking or any other acts, which might jeopardise the health and safety of any other person, are illegal and will not be tolerated.
- Work shall be well planned and supervised by competent personnel to avoid injuries in the handling of heavy materials and while using equipment.
- Any person whose levels of alertness and/or ability are reduced due to illness or fatigue will not be allowed on the job if this might jeopardise the health and safety of that person or any fellow employee.
- Employees should take care to ensure that all-protective guards and other safety devices are properly fitted and in good working order and shall immediately report any deficiencies to their supervisor or the Works Manager.
- Employees shall not adjust, move or otherwise tamper with any electrical equipment, machinery or air or water lines in a manner not within the scope of their duties, unless instructed to do so by a senior member of staff.
- All injuries must be reported to the Health and Safety Adviser and recorded in the accident book, located in the office.
- All waste materials must be disposed of carefully and in such a way that they do not constitute a hazard to other workers.
- No worker should undertake a job, which appears to be unsafe.
- No worker should undertake a job until he or she has received adequate safety instruction and training in that task.
- No employee should use chemicals without sufficient instruction, information and training required to handle and control them safely.