Health & Safety Policy.

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1 – Policy Statement

Health and Safety, Quality, Environment, Policy Statement

Pave-Aways Limited, which operates nationwide within the United Kingdom from its bases in Oswestry, Wrexham and Newtown, is a forward thinking design and construction company catering for clients within the public and private sectors.

From our inception, we have been totally committed to ensuring that we provide the very highest standards of service to our customers and that we operate in a manner which protects the environment together with the health, safety and wellbeing of the public, our customers, employees and contractors. To help us achieve these goals, we operate a management system in accordance with the following international standards: ISO 9001, ISO 14001 and ISO 45001. The scope of our management system includes: The management and operation of construction, civil engineering and public works contracting.

Our leadership team is fully committed to the provision of all resources necessary to ensure that we:

- Meet (and where possible exceed) the needs and expectations of all interested parties.
- Fulfil our compliance obligations (including all applicable legal and other requirements)
- Provide safe and healthy working conditions for the prevention of work-related injury and ill health.
- Eliminate hazards and reduce occupational health and safety related risks.
- Consult with and allow the participation of workers and their representatives in all matters related to occupational health and safety.
- Prevent pollution.
- Set challenging annual objectives aimed at continually improving our quality, environmental and health and safety performance.

As a company which firmly believes in the principles of sustainable development, we also recognize the importance of assisting others to achieve similar business goals and therefore actively encourage our supply chain to adopt similar management practices.

2. Organisation and Responsibilities

2.1 Managing Director – S Owen

The Managing Director has overall and final responsibility for health and safety within Pave Aways Limited.

The Managing Director will:

- Provide leadership and demonstrate visible commitment to health and safety.
- Ensure adequate resources are made available to implement this policy.
- Ensure health and safety is considered within business and project planning.
- Establish appropriate health and safety objectives and improvement priorities.
- Review health and safety performance with the management team.
- Ensure competent advice is available to the Company.
- Ensure significant accidents, incidents and enforcement matters are appropriately reviewed.
- Promote a positive safety culture throughout the organisation.
- Ensure managers are held accountable for fulfilling their health and safety responsibilities.

2.2 General Manager / Director – S Owen

The General Manager/Director will support the Managing Director in implementing this policy and will:

- Ensure health and safety requirements are incorporated into operational planning.
- Monitor management performance against Company standards.
- Ensure adequate staffing, competence, equipment and resources are available.
- Support the Contracts Managers and Site Managers in achieving required standards.
- Ensure health and safety issues identified through inspections, audits and investigations are addressed.
- Participate in management reviews and improvement planning.

2.3 Health, Safety & Environmental Manager – Alex Taylor

The Health, Safety & Environmental Manager is responsible for providing competent health and safety advice and supporting the Directors and operational management in implementing and continually improving the Company's H&S management arrangements.

The HSE Manager will:

- Advise Directors and senior management on health and safety matters.
- Develop, implement, maintain and review the Company's H&S management system.
- Monitor changes in legislation, guidance and industry good practice.
- Develop and review Company policies, procedures and standards.
- Provide competent advice on risk assessments and control measures.
- Review project-specific health and safety arrangements.
- Support the preparation and review of Construction Phase Plans.
- Audit and inspect sites and Company activities.
- Monitor compliance with legislation, Company policy and project requirements.
- Investigate accidents, incidents, near misses and significant cases of work-related ill health.
- Identify trends and recommend preventative action.
- Monitor completion of corrective actions.
- Identify health and safety training requirements.
- Maintain appropriate health and safety records.
- Provide health and safety reports and performance information to Directors.
- Support consultation with employees and workers.
- Monitor subcontractor health and safety performance.
- Liaise with clients, designers, subcontractors, occupational health providers, insurers and enforcement authorities where appropriate.
- Ensure statutory inspection and examination requirements are identified and monitored.
- Support emergency planning and response arrangements.
- Participate in management reviews and continual improvement activities.

The Health, Safety & Environmental Manager has the authority to recommend or require the suspension of work where there is a significant risk to health, safety or welfare. Work will not recommence until suitable controls have been established.

2.4 Contracts Managers

Contracts Managers are responsible for ensuring that health and safety requirements are effectively implemented across the projects under their control.
They will:

- Ensure projects are properly planned and resourced.
- Ensure the requirements of this policy are implemented.
- Ensure appropriate Construction Phase Plans are prepared, maintained and reviewed.
- Ensure Site Managers understand their responsibilities.
- Monitor site health and safety performance.
- Carry out formal site inspections.
- Review RAMS and ensure they are suitable for the activities being undertaken.
- Ensure subcontractors are appropriately assessed and monitored.
- Ensure significant risks are escalated to the HSE Manager and Directors.
- Ensure lessons learned from incidents and projects are shared.
- Attend site meetings and health and safety meetings as required.
- Ensure adequate supervision is provided.
- Support the investigation and close-out of incidents and corrective actions.
- Ensure toolbox talks and workforce briefings are undertaken.
- Consult with employees and workers.
- Lead by example and challenge unsafe behaviour or conditions.

2.5 Site Managers

The Site Manager has day-to-day responsibility for managing health and safety on the site under their control.
The Site Manager will:

- Implement the Construction Phase Plan and site-specific health and safety arrangements.
- Plan, organise, coordinate and control site activities.
- Ensure work is undertaken in accordance with approved RAMS.
- Ensure RAMS are communicated to the workforce before work starts.
- Ensure workers understand the hazards and controls associated with their work.
- Provide suitable supervision.
- Coordinate subcontractors and prevent unsafe interfaces between activities.
- Ensure suitable welfare facilities are provided and maintained.
- Maintain good site housekeeping.
- Ensure suitable access and egress are maintained.
- Ensure plant, equipment and temporary works are appropriately controlled.
- Ensure statutory inspections and checks are undertaken.
- Ensure appropriate PPE is available and used.
- Deliver or arrange appropriate toolbox talks and briefings.
- Monitor changing site conditions and amend RAMS where necessary.
- Stop work where controls are inadequate or conditions change significantly.
- Report accidents, incidents, near misses and unsafe conditions.
- Cooperate with inspections and audits.
- Ensure corrective actions are completed.
- Maintain required site records.
- Ensure emergency arrangements are understood and implemented.
- Set a positive personal example.

2.6 Supervisors

Supervisors are responsible for the direct supervision of workers under their control. They will:

- Understand the RAMS relevant to their activities.
- Brief workers before work commences.
- Monitor compliance with safe systems of work.
- Ensure workers are competent and authorised.
- Identify changing conditions and escalate concerns.

- Carry out appropriate pre-use checks.
- Maintain good housekeeping.
- Challenge unsafe acts and conditions.
- Stop work where necessary.
- Report defects, incidents and near misses.
- Support toolbox talks and workforce consultation.

2.7 Employees and Workers

Everyone working for or on behalf of Pave Aways Limited has a responsibility for health and safety.

Employees and workers must:

- Take reasonable care of their own health and safety and that of others who may be affected by their actions or omissions.
- Cooperate with the Company and its management arrangements.
- Follow instructions, RAMS and site rules.
- Use plant, equipment and PPE correctly.
- Attend required training, inductions and briefings.
- Report hazards, defects, incidents and near misses.
- Never intentionally interfere with safety equipment.
- Never undertake work for which they are not competent, trained or authorised.
- Stop work where they believe there is an immediate or significant risk.
- Raise concerns without fear of unreasonable reprisal.

3. Risk Assessment and Safe Systems of Work

Pave Aways Limited will adopt a systematic approach to identifying hazards and controlling risk.

Risk assessments will consider:

- The nature of the activity.
- The people undertaking the work.
- Other people who may be affected.
- Plant and equipment.
- Materials and substances.

- The workplace and environment.
- Interfaces with other contractors.
- Existing structures and services.
- Temporary works.
- Emergency arrangements.
- Environmental conditions.
- Vulnerable persons.
- Changes to the planned work.

The principles of prevention will be applied, with priority given to eliminating hazards and reducing risk at source.

Where significant risks remain, suitable control measures will be documented within risk assessments, method statements, permits or other appropriate safe systems of work.

RAMS will be:

1. Prepared by competent persons.
2. Reviewed by appropriate management.
3. Communicated to those undertaking the work.
4. Understood before work starts.
5. Monitored during the work.
6. Reviewed when circumstances change.

RAMS will not be treated as static documents. Where conditions, design, sequencing, personnel, equipment or methods change, the work will be reassessed.

4. CDM 2015 and Principal Contractor Arrangements

Pave Aways Limited recognises its responsibilities as a Principal Contractor under the **Construction (Design and Management) Regulations 2015**.

For projects where Pave Aways Limited is appointed Principal Contractor, the Company will:

- Plan, manage, monitor and coordinate the construction phase.
- Prepare and maintain a suitable Construction Phase Plan.
- Ensure suitable site management arrangements are established.
- Provide appropriate welfare facilities.
- Ensure cooperation and coordination between contractors.

- Ensure contractors are competent and adequately resourced.
- Provide suitable site inductions.
- Establish appropriate site rules.
- Control access to the site.
- Monitor health and safety performance.
- Coordinate construction activities to prevent risks arising from interfaces.
- Ensure relevant pre-construction information is considered.
- Cooperate with the Client and Principal Designer.
- Provide relevant information for the Health and Safety File.
- Ensure significant changes affecting health and safety are appropriately managed.

HSE confirms that a Construction Phase Plan is required for every construction project and should set out how the work will be planned, organised and managed safely.

Pave Aways Limited will maintain the Construction Phase Plan throughout the construction phase and update it where necessary.

5. Selection and Management of Contractors

Contractors and subcontractors will be selected based on their competence, experience and ability to undertake the work safely.

Assessment may include:

- Previous experience.
- Relevant qualifications.
- Competence and resources.
- Health and safety performance.
- Insurance.
- Policies and procedures.
- RAMS.
- Training arrangements.
- Relevant accreditations.
- Plant and equipment.
- Workforce competency.
- Previous performance with Pave Aways Limited.

Before work commences, contractors will receive relevant information concerning:

- Site rules.
- Hazards.
- RAMS requirements.
- Emergency arrangements.
- Welfare.
- Access and egress.
- Interfaces with other contractors.
- Permits.
- Reporting requirements.

Contractors will be monitored through inspections, audits, meetings, observations and performance reviews.

Where standards are unacceptable, corrective action will be required. Where there is a significant or uncontrolled risk, work will be stopped until adequate controls are established.

6. Consultation and Worker Engagement

Pave Aways Limited recognises that effective consultation with workers is essential to achieving a positive health and safety culture.

Consultation will take place through:

- Site inductions.
- Toolbox talks.
- Daily briefings.
- Site meetings.
- Safety meetings.
- Management site visits.
- Worker representatives.
- Informal discussions.
- Incident reviews.
- RAMS briefings.

Workers will be encouraged to report hazards, suggest improvements and challenge unsafe conditions.

The Company's **Stop Work Procedure** will apply:

STOP – STOP OTHERS – REVIEW – ESCALATE

Any worker who believes they or another person is at risk should stop the activity and notify supervision. The RAMS and controls will then be reviewed before work recommences.

7. Plant and Equipment

All plant and equipment will be:

- Suitable for its intended purpose.
- Properly maintained.
- Inspected before use where required.
- Operated only by competent and authorised persons.
- Used in accordance with manufacturers' instructions.
- Subject to statutory inspection and examination where applicable.

The requirements of **PUWER 1998** and **LOLER 1998**, where applicable, will be incorporated into plant and equipment management.

Defective equipment will be removed from service, clearly identified and quarantined until repaired or otherwise appropriately dealt with.

Hired equipment will be checked for suitability, condition and required inspection/examination certification.

8. COSHH and Hazardous Substances

Pave Aways Limited will seek to eliminate hazardous substances wherever reasonably practicable and substitute less hazardous alternatives where possible.

Where hazardous substances are used, COSHH assessments will identify:

- The substance.
- The hazards.
- Exposure routes.
- People exposed.
- Required control measures.
- Storage requirements.
- PPE.
- Emergency arrangements.
- Health surveillance requirements where applicable.

Safety Data Sheets will be obtained and made available where appropriate.
Workers will receive information, instruction and training relevant to the substances they use.
COSHH assessments will be reviewed where substances, processes, exposure or control measures change and periodically to ensure they remain suitable.

9. Work at Height

Work at height will be avoided wherever reasonably practicable.
Where work at height cannot be avoided, it will be:

- Properly planned.
- Risk assessed.
- Appropriately supervised.
- Undertaken by competent persons.
- Carried out using suitable equipment.

The hierarchy in the **Work at Height Regulations 2005** will be followed:

1. Avoid work at height.
2. Prevent falls where work at height cannot be avoided.
3. Minimise the distance and consequences of a fall where prevention is not reasonably practicable.

Collective protection will normally be prioritised over personal fall protection. HSE guidance confirms that this hierarchy should be applied systematically rather than selecting lower-level controls first.
Scaffolding, towers, MEWPs, podiums and other access equipment will be selected according to the risk and task.
Scaffolds will be erected, altered and dismantled by competent persons and managed in accordance with applicable legislation and current industry guidance.
All relevant work-at-height equipment will be inspected as required.
Ladders and stepladders will only be used where a suitable risk assessment demonstrates that they are appropriate for the task.

10. Lifting Operations

All lifting operations will be properly planned, supervised and carried out safely.
Where Pave Aways Limited is responsible for the lifting operation:

- A competent person will plan the lift.
- A suitable lifting plan will be produced where required.
- Lifting equipment and accessories will be suitable.
- LOLER requirements will be met.
- Ground conditions and exclusion zones will be considered.
- Weather conditions will be considered.
- Competent operators and banksmen/signallers will be used where required.
- Lifting operations will be appropriately supervised.

Contract lifts will normally be used unless an alternative arrangement is specifically approved by senior management.

11. Asbestos

Pave Aways Limited recognises the significant health risks associated with asbestos exposure.

Asbestos risks will be managed in accordance with the **Control of Asbestos Regulations 2012** and relevant HSE guidance.

For existing buildings, appropriate asbestos information and surveys will be obtained before intrusive work begins. Where refurbishment or demolition is proposed, an appropriate **Refurbishment and Demolition Survey** will be obtained before work that could disturb the building fabric.

Asbestos information will be communicated to relevant personnel.

Where asbestos-containing materials are identified or suspected:

WORK WILL STOP.

The area will be made safe and access restricted. The Site Manager and HSE Manager will be informed and the material will be assessed by a competent person.

The Company will determine whether the work is:

- Licensed;
- Notifiable non-licensed work; or
- Non-licensed, non-notifiable work.

Where licensed work is required, it will be undertaken by an appropriately licensed asbestos contractor.

Where non-licensed work is undertaken by Pave Aways Limited employees, the Company will ensure that the work is within the competence and training of the persons undertaking it and that all applicable legal requirements are met.
All operatives will receive asbestos awareness training appropriate to their work. Additional training will be provided where employees are required to undertake work with asbestos.
The existing wording stating that **all operatives will receive UKATA Category A training** should be reconsidered. Category A is asbestos awareness; it does not authorise someone to carry out asbestos work. The training required should reflect the actual work being undertaken.
HSE continues to emphasise the importance of appropriate asbestos surveys and clear identification of NNLW requirements.

12. Hand Tools and Portable Equipment

Tools will be:

- Suitable for the intended task.
- Maintained in good condition.
- Inspected before use.
- Used by competent persons.
- Used in accordance with manufacturers' instructions.

Battery-powered tools will be used where reasonably practicable.
Where mains-powered equipment is required, suitable electrical protection will be provided.
Defective tools will be removed from service and clearly identified until repaired or replaced.

13. Information, Instruction, Training and Supervision

Pave Aways Limited will provide employees and workers with suitable information, instruction, training and supervision.
Training needs will be identified based on:

- Job role.
- Risk assessment.
- Legal requirements.

- Competence requirements.
- Project-specific hazards.
- Changes to work methods.
- Previous incidents.
- Performance monitoring.

Training may include:

- Site induction.
- Toolbox talks.
- Task-specific training.
- Plant and equipment training.
- Work-at-height training.
- Asbestos awareness.
- Manual handling.
- COSHH.
- Fire safety.
- First aid.
- Emergency procedures.

Training records will be maintained.

Workers who have difficulty understanding written or spoken English will be provided with appropriate assistance, which may include pictograms, translated information, demonstrations or assistance from a competent person who can communicate the relevant information effectively.

14. Occupational Health

Pave Aways Limited recognises that protecting health is as important as preventing accidents.
The Company will identify work activities that may cause occupational ill health, including exposure to:

- Construction dust.
- Silica.

- Asbestos.
- Noise.
- Hand-arm vibration.
- Hazardous substances.
- Manual handling.
- Musculoskeletal risks.
- Display screen equipment.
- Other occupational health hazards identified through risk assessment.

Where legally or technically appropriate, health surveillance will be provided.
Health surveillance will be undertaken by appropriately competent occupational health professionals where required and will be proportionate to the identified risk.
The Company will also promote early reporting of symptoms and encourage workers to raise occupational health concerns.

15. Accidents, Incidents and Near Misses

All accidents, incidents, dangerous occurrences and near misses will be reported promptly.
The Company will:

- Provide appropriate immediate assistance.
- Make the area safe.
- Preserve evidence where necessary.
- Notify management.
- Investigate significant incidents.
- Identify immediate, underlying and root causes where appropriate.
- Implement corrective actions.
- Communicate relevant lessons learned.
- Monitor completion of actions.

Where an incident is reportable under **RIDDOR**, the required notification will be made to the enforcing authority within the applicable statutory timescale.
Incident trends and statistics will be reviewed to identify opportunities for prevention.

16. First Aid

Suitable first-aid arrangements will be provided based on the size, nature and risks of each workplace.

The Company will ensure:

- Appropriate first-aid equipment is available.
- Suitable numbers of trained first aiders are provided.
- First-aid arrangements are communicated during induction.
- First-aid equipment is inspected and replenished.
- Arrangements account for shifts, holidays and absence.

Project-specific arrangements will be documented within the Construction Phase Plan.

17. Fire and Emergency Arrangements

Pave Aways Limited will ensure suitable emergency arrangements are established for its offices, sites and workplaces.

These will consider:

- Fire.
- Evacuation.
- Serious injury.
- Structural collapse.
- Asbestos discovery.
- Utility strikes.
- Hazardous substance release.
- Severe weather.
- Security incidents.
- Other reasonably foreseeable emergencies.

Site-specific emergency procedures will be communicated during induction.

Escape routes will be maintained and kept clear.

Fire extinguishers and other firefighting equipment will be appropriately selected, maintained and inspected.

Fire drills will be undertaken where appropriate.

Hot works will be controlled through risk assessment and a permit-to-work system where required.

18. Lone Working

Pave Aways Limited will avoid lone working where the risk assessment identifies that it is not reasonably practicable to work safely alone.

Where lone working is unavoidable, a specific assessment will identify:

- The hazards.
- Required controls.
- Communication arrangements.
- Emergency arrangements.
- Welfare considerations.
- Check-in procedures.

Where the Company's arrangements require two people to be present for a particular activity, work will not proceed unless that requirement is met.

19. Personal Protective Equipment

PPE will be used where risks cannot be adequately controlled through elimination, substitution, engineering controls or other measures.

PPE will:

- Be suitable for the identified risk.
- Be compatible with other PPE.
- Fit the individual.
- Be maintained in good condition.
- Be stored appropriately.
- Be replaced when damaged or no longer suitable.

Where tight-fitting respiratory protective equipment is required, suitable **face-fit testing** will be undertaken.

Workers will receive appropriate instruction and training in the use, limitations, storage and maintenance of PPE.

PPE will be provided without charge where required by law and Company arrangements.

20. Smoking

Pave Aways Limited operates a smoke-free workplace in accordance with applicable legislation.
Smoking and vaping will not be permitted inside Company premises, vehicles or enclosed workplaces.
Where permitted by the site/client arrangements, smoking will only take place within designated areas.
Site management will communicate the requirements during induction.

21. Alcohol and Drugs

Pave Aways Limited is committed to maintaining a workplace free from the risks associated with alcohol and drug misuse.
Employees, workers and subcontractors must not:

- Attend work under the influence of alcohol or drugs.
- Consume alcohol during working hours.
- Possess or use illegal drugs at Company workplaces.
- Operate plant, machinery or vehicles while impaired.

Where there are reasonable grounds to believe that a person is unfit for work, they will be removed from safety-critical duties and the matter will be managed in accordance with Company procedures.
Where appropriate, medical advice will be sought.
Disciplinary action may be taken in accordance with Company procedures.

22. Health Surveillance and Wellbeing

Health surveillance requirements will be determined through risk assessment and applicable legislation.
The Company will pay particular attention to risks associated with:

- Hand-arm vibration.
- Noise.
- Respiratory exposure.
- Hazardous substances.
- Occupational dermatitis.
- Musculoskeletal disorders.
- Display screen work.

Workers will be encouraged to report symptoms at an early stage.
Where health surveillance identifies concerns, appropriate action will be taken, including referral to occupational health where necessary.

23. Behaviour and Conduct

All employees and workers are expected to behave professionally and respectfully.
Pave Aways Limited will not tolerate:

- Bullying.
- Harassment.
- Discrimination.
- Threatening or abusive behaviour.
- Deliberate unsafe acts.
- Intimidation.
- Violence.

Everyone has the right to raise health and safety concerns without fear of retaliation.
Particular care will be taken where work is undertaken in schools, healthcare environments, occupied buildings or other locations where members of the public or vulnerable persons may be present.

24. Monitoring, Inspection and Audit

Pave Aways Limited will use both proactive and reactive monitoring to assess health and safety performance.
Proactive monitoring will include:

- Site inspections.
- Management visits.
- H&S audits.
- RAMS reviews.
- Toolbox talk monitoring.
- Plant inspections.
- Subcontractor monitoring.
- Training compliance checks.
- Action tracking.
- Site observations.

Reactive monitoring will include:

- Accident investigation.
- Near-miss investigation.
- Dangerous occurrence investigation.
- Occupational health information.
- Complaints.
- Enforcement action.
- Non-conformances.

Findings will be recorded and assigned to responsible persons with appropriate target dates.

Outstanding actions will be monitored through to completion.

25. Performance Review and Continual Improvement

Health and safety performance will be reviewed regularly by management.

Performance information may include:

- Accident frequency and severity.
- Near misses.
- Unsafe condition reports.
- Inspection findings.
- Audit findings.
- Outstanding actions.
- Training performance.
- Occupational health information.
- Subcontractor performance.
- Enforcement activity.
- Client feedback.

The Company will use this information to identify trends, establish improvement priorities and prevent recurrence.

The H&S management system will be reviewed at least annually and following significant changes to:

- Legislation.
- Company structure.
- Work activities.

- Significant incidents.
- Management arrangements.
- Risk profile.

This approach reflects HSE's recommended **Plan–Do–Check–Act** model, where performance is measured, lessons are learned and arrangements are reviewed and improved rather than simply documented.

26. Health and Safety Advice

Pave Aways Limited will maintain access to competent health and safety advice through the Health, Safety & Environmental Manager.
Where additional specialist advice is required, the Company will obtain advice from appropriately competent external organisations or specialists.
Sources of information may include:

- Health and Safety Executive.
- IOSH.
- CITB.
- Relevant professional and trade bodies.
- Specialist consultants.
- Competent training providers.
- Manufacturers and technical specialists.

27. Review and Approval

This policy will be reviewed at least annually and sooner where there is:

- A significant change in legislation.
- A significant change in Company activities.
- A significant accident or incident.
- A change in organisational structure.
- A change in health and safety responsibilities.
- Evidence that the policy is no longer effective.

The policy will be communicated to employees and made available to relevant interested parties.



Steven Owen, Managing Director

Date: 16/07/26

Review: 16/07/27