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## HEALTH SAFETY & ENVIRONMENT POLICY DOCUMENT

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Approved by:	Signed:	Date:
Joshua Payne	<i>Joshua Payne</i>	30.11.23

**Produced By Joshua E Payne**

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## **1 PURPOSE**

This will involve:

- Identifying significant risks arising from consulting in high-risk environments.
- Identifying, advising, and prioritising control measures to be taken to comply with the relevant statutory provisions.
- Ensuring all relevant hazards and risks are addressed and communicated.
- Ensuring all groups of employees and others who might be affected, are considered and informed of the risks.
- Identifying groups of workers that might be particularly at risk.
- Taking account of existing preventative or precautionary measures following the control hierarchy in all cases i.e., Eliminate, Reduce, Isolate, Control, PPE, and Discipline

The risk assessments will be used positively by the company to change working procedures, support, and develop competence, and improve health and safety throughout 3Spires Safety.


## **2 SCOPE**

This policy document and associated procedures set the minimum health and safety standards to which all 3Spires Safety contractors, and subcontractors will operate.

The policy supplements our health and safety management system documentation and sets a framework for the establishment of a safe method of work and successful health and safety culture throughout 3Spires Safety. It outlines the responsibilities and arrangements for ensuring health and safety at work.

It is the intention of 3Spires Safety to adopt the 'highest minimum legal standards' as a baseline requirement for health and safety throughout the organisation. 3Spires Safety will endeavour to work to industry best practice and ACOPs for the industries in which we support.

This policy will be reviewed annually, and supplementary information distributed to all Contractors. Suggestions for inclusion, corrections, and revisions for future editions of this policy should be forwarded to the Managing Director.

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### 3 DEFINITIONS

**Safety Management System (SMS):** A system to manage all aspects of safety throughout an Organisation. Providing a systematic identification of hazard to control risk at source and maintain these controls in all areas of operation.

**Incident:** An unplanned event regardless of whether it results in harm, injury, damage, loss, casualty or mishap.

**Dangerous Occurrence:** An event which is specified in the legal statutory instrument of the country of operation and is of such a nature that its occurrence is significant in terms of risk to health and safety or is indicative of unsafe conditions/behaviour having occurred.

**Near Miss:** An Incident in respect of which there is no resultant injury or damage, but where there was potential for injury or damage to result.

**Premises:** Office space owned by 3Spires Safety

**HSE:** Health and Safety Environment

### 4 REFERENCE DOCUMENTATION

All 3Spires Safety internal SMS documentation referenced will be stored in the 3Spires Google Drive and accessible to the workforce.

### 5 HEALTH, SAFETY, ENVIRONMENT POLICY STATEMENT

#### Purpose of Policy

3 Spires Safety Solutions are committed to protecting the health, safety, welfare & environmental footprint, of all our employed staff, contractors, personnel attending our premises and any persons affected by our business activities as well as the environment in which we operate. This policy statement is intended to outline our organizational commitment to achieving environment, health and safety excellence and our continued efforts to improve health and safety performance.

#### Responsibilities

Achieving the highest standards of HSE in the workplace is the responsibility of both management and employees. Through clear leadership 3 Spires Safety Solutions expect positive participation from all personnel, encouraging improvement of health, safety & environmental performance both within the organisation and extending to our suppliers and the communities in which we do business.

### Organisational Beliefs

- Safety is the number one priority.
- Never forget the E in HSE.
- All HSE incidents can be avoided with diligent planning.

### Organisational Aims

- Zero harm to personnel
- Zero repeat incidents or near misses
- Promote sustainable practices.

### Organisational Commitment

- Manage a safe and healthy working environment that is consistently compliant with regulatory requirements and industry best practices.
- Risk assess the work environments our consultants are working in.
- Be transparent always, all incidents are to be accurately reported and recorded.
- All HSE incidents shall be investigated to determine the root cause and establish corrective measures and lessons learned.
- Work in tandem with HSE legislation applicable to the country in which we are working in.
- Provide adequate information, instruction, training and supervision where applicable to enable all personnel to work safely, avoid hazards and contribute to a positive culture.
- Promote effective health and safety communication and consultation across all levels of personnel within the organisation.
- We commit to maximizing the recycling and reuse of materials where possible including the segregation of all waste generated and aim to utilize energy sources efficiently.
- To continuously review and update our HSSE management system and that of our clients to ensure it is current and effective.
- Segregate waste and audit waste streams for applicable national and local compliance.
- Educate Project personnel on environmental compliance, chemical management and Project aspects and impacts that arise from work activities.

Joshua Payne  
Managing Director

*Joshua Payne*

Date: 30/11/2023

3 Spires Safety Solutions

## **6 ORGANISATION FOR CARRYING OUT THE POLICY**

### **6.1 Safety Responsibilities & Company Structure**

The company organogram is spearheaded by the Managing Director Joshua Payne, the MD manages a division of HSE professionals who are all external contractors. Their safety and wellbeing is frequently co-managed due to alignment with end Client HSE management systems.

### **6.2 Accountability and Responsibility**

Managing Director Joshua Payne is ultimately responsible for ensuring the implementation of the HSE policy at all levels within the business and for the provision of adequate resources to meet the requirements of the policy, such as allocating time to perform risk assessments, communicate these through briefing and training, facilities to hold meetings, check competence prior to consultant appointment and provide support for all consultants in HSE matters globally.

### **6.3 Individual Responsibilities**


#### **6.3.1 Managing Director**

- Ensuring that 3Spires HSE policy and objectives are effectively and consistently implemented throughout the organisation.
- Ensure that due diligence is exercised in the appointment of subcontractors to ensure they are suitably competent for the role which they are appointed to perform.
- Track training certs for PPE and training of all appointed Contractors
- Ensure consultants possess applicable insurances.
- Risk assess work activities that might be over looked by end-clients.

#### **6.3.2 Contractors**

The company does from time to time employ subcontractors. As a condition of appointment by the Company, sub-contractors will be required to: -

- Carry out their work in accordance with relevant legislation, approved codes of practice, guidance notes, End- Clients SMS's and recognised safe working practice.
- Ensure that all equipment needed to support their job function brought to the workplace is safe, designed to the required standard, and in a good state of repair.
- Ensure supporting insurances for the advice that they give to 3Spires End- Clients and the general public.
- Ensure they are medically fit and declare all known medical conditions prior to employment.
- Ensure deliverables & HSE performance set by End-Clients are met.
- All loaned IT & Equipment is returned to End-Clients at the conclusion of the assignment.

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### ***6.3.3 Assignment of Individuals***

In order for the organisations safety arrangements to be effective, individual duties and responsibilities will be clearly identified.

There will be a logical delegation of duties throughout the organisation, with the Managing Director assuming a policy-making and guiding role.

The individuals listed below, have been allocated general and specific health and safety responsibilities within our policy.

Responsibilities will fall into two categories:

- General Responsibilities
- Specific Responsibilities

### ***6.3.4 General Responsibilities***

The following individual posts have been allocated general health and safety responsibilities within the terms of our policy:

- Managing Director(s)
- Consultants

They will also be required to monitor their areas of control as well as the performance and activities of subordinates to ensure that acceptable standards are maintained.

The Managing Director(s) shall be responsible for ensuring,

- The objectives outlined within our HSE management system are fully understood and observed by persons under their control.
- Responsibilities for health and safety are clearly defined and allocated/delegated to the appropriate levels within the organisation.
- The HSE policy is regularly reviewed and amended as necessary, and any changes are brought to the attention of all persons under their control.
- They make a commitment to improving health and safety throughout the organisation demonstrated by their behaviour.
- The health and safety policy is brought to the attention of all employees under their control, and ensures that they are made aware of all hazards and the means of controlling those hazards.

Consultants shall,

- Take reasonable care of their own HSE and that of others who may be affected by their actions.
- Co-operate with management to meet the employer's legal duties and work in accordance with the organisation's procedures.
- Not intentionally or recklessly interfere with anything provided in the interest of health, safety or welfare and refrain from actions (or inactivity) which might endanger themselves or others.
- Demonstrate their commitment by their behaviour and co-operate in the investigation of accidents and incidents.
- Use all equipment safely including that provided for their personal protection and report to management any defects in equipment or other dangers at once, or as soon as is safe to do so.
- Comply with all safety instructions or procedures and not undertake any tasks that they are not trained for.
- Review the visitors risk assessment and visitors' policy prior to starting work in a new environment.
- Coach and educate the workforce to evolve safety culture.

## **7 ARRANGEMENTS FOR IMPLEMENTATION OF THE POLICY**

Arrangements and procedures are in place to control significant risk identified in risk assessments. These include but are not limited to inspection, maintenance, operating procedures, training, supervision, monitoring etc.

These arrangements and procedures will be incorporated within relevant sections of 3Spires Safety Health and Safety Management System, so supporting the intent set out in the 3Spires Safety HSE Policy Statement

### **7.1 Accident, Incident and Near Miss Reporting**

It is a legal duty to investigate accidents, incidents and near misses in most countries which ensures employers have to plan, organize, control, monitor and review their HSE arrangements. Health and safety investigations form an essential part of this process. Therefore, the commitment in this policy must be strictly adhered to at all times.



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This includes both internal reporting requirements and external. All accidents, however minor, must be entered into the applicable accident book and on an accident template form. This includes accidents that occur on Client premises, where accidents must be reported immediately to the management in accordance with their procedures.

All persons with a HSE role within the organisation must as a minimum make themselves aware of their reporting / investigation responsibility and have received familiarisation training. They have accepted that all information is classified as confidential as personal information is recoded on incident report forms, the Data Protection Act applies. Data is to be kept in a secure location with access limited to 3Spires authorised personnel only.

Example - UK External reporting - The responsible person must notify the enforcing authority without delay, in accordance with the reporting procedure (Schedule 1). This is most easily done by [reporting online](#). Alternatively, for fatal accidents or accidents resulting in specified injuries to workers only, you can phone 0345 300 9923.

## **7.2 Accident Investigation**

3Spires Safety will assure where practicable all accidents / incidents of work-related ill health, dangerous occurrences and near misses will be fully investigated by a suitably competent HSE resource. 3Spires Safety will, so far as is reasonably practicable, enact any agreed recommendations made as part of the investigation.

In the event of any corrective action taken, staff will be provided with any necessary information, instruction, training and supervision. 3Spires Safety will co-operate fully with any external investigating authority where applicable. Root Cause analysis is to be facilitated by the allocated HSE resource or a competent H&S trained person.

## **7.3 Alcohol & Drugs**

Illegal drugs are strictly forbidden working under the 3Spires Safety umbrella and across the company's various working environments inclusive of the Offshore/Onshore windfarms, Offshore vessels, Waste Facility's, Commercial Construction Sites, Warehouse premises, offices areas and vehicles. Moreover, outside contractors coming into a working environment are governed by the same set of rules further reflected in Client inductions and Alcohol and Drug procedures.

The consumption of Alcohol is only permitted in the consultants own personal time outside working hours. We operate a zero-tolerance approach to breaching drinking and driving laws specific to the UK and Zero tolerance will be maintained concerning illegal drug use at work. If a

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worker is using prescription medication this must be notified to the 3Spires Safety MD prior to work commencing; failure to do so may be considered a breach of this policy and may lead to suitable disciplinary action or legal action. Any person who appears to be under the influence of alcohol or drugs will not be permitted to start/continue working for 3Spires Safety.

#### **7.4 Auditing and Inspection**

Periodic auditing and inspection of various working environments is a reoccurring service that 3Spires Safety provide. It is of a paramount importance that all consultants are inducted, and suitably versed in all foreseeable residual risks at site and the unfolding work scope prior to conducting an audit/inspection. Control measures advised should always be specific, measurable, achievable and time bound.

The control measures advised should take into consideration the nature, size and turnover of the business being audited. Auditing a work environment should primarily focus on the approved safe system of work against what the workforce are actually doing. All safety system audits of 3Spires clients should be appropriately planned against an agreed scope and audit plan should be distributed within a reasonable time frame to the client so they can prepare appropriately. Under no circumstances should 3Spires consultants participate in physical labour in order to aid work scope progression, they are appointed to supervise, manage and advise in line with their insurances only.

#### **7.5 Signs and Signals**

Regulations and Directives across the EU require employers to ensure that safety signs are provided (or are in place) and maintained in circumstances where there is a significant risk to health and safety that has not been removed or controlled by other methods. All 3Spires Safety consultants must take into consideration all signage that is employed inside the work environments they visit. Under no circumstances should signage be ignored due to a false pretence of seniority. Where no access signage is presented then special dispensation needs to be granted by the client for a consultant to enter.

#### **7.6 Equipment & Plant**

3Spires Safety understand that equipment safety can be a high-risk area. All appointed consultants are expected to only take equipment such as laptops or reading equipment to 3Spires End-Client sites if it is fit for purpose, PAT tested where applicable and safe to use.

Where 3Spires Safety consultants are likely to encounter moving plant they must ensure that they understand the risks before accessing the workplace, use approved access egress routes on sites/facilities, wear high visibility clothing & PPE in line with Client rules, exercise vigilance at blind spots, never approach plant operators unless you have their attention and it is safe to do so, assess the operator & plants certification prior to the HSE walk around to ensure expiry dates have not elapsed.

### **7.7 Display Screen Equipment**

It is generally accepted that the display screen equipment itself is not detrimental but the way in which it is used can contribute to discomfort, ill-health, aches and pains, eye fatigue, headaches and stress. Therefore, each workstation within a new work environment must be assessed individually taking account of the layout of the workstation, levels of lighting, the condition and suitability of equipment, individual user requirements etc. All use of display screen equipment will adhere to the local country legislative requirements, or the highest minimum legal standard.

### **7.8 Driving at Work**

Driving at work offers an occupational safety risk. This risk must be managed as any other risk at 3Spires Safety. The following guidelines should be followed by all consultants of 3Spires Safety driving during work activities:

- Plan your journey and take regular breaks, tiredness kills.
- Never drive under the influence of drugs, and medication that may hinder concentration.
- Do not use mobile phones while driving and always wear a seat belt.
- Reverse park where possible.
- We operate a zero-tolerance approach to breaching drinking and driving laws.
- Ensure speed limit signage is adhered to at all times.
- Ensure that personal the vehicle is fit for the journey, fuelled, wind screen fluid, coolant, oil checks.
- Do not compromise on safety for financial gain when selecting hire cars and insurance, taking into consideration the weather forecast for your transit path.
- Be aware of the variety of driving conditions and legal requirements in the country in which you are driving and make suitable decisions to minimise risk accordingly if driving – drive at a safe time and distance away from other vehicles where possible.
- Invest in defensive driving courses if long distance driving becomes a re-occurring task in particular if seasonal & adverse weather changes are incoming.

## **7.9 Electricity at Work**

3Spires Safety will take all reasonable steps to secure the health and safety of its consultants who are appointed to observe work with electricity and/or use electrical equipment. The guiding principle is 'no unavoidable live working' meaning no supervision or inspecting area's where hazardous energy is not under control. All electrical power sources within all work environments are to be isolated and locked off by a competent person before work commences.

All electrical circuits and equipment will be tested and inspected to ensure it is fit for purpose, and suitable records maintained and be on hand for the 3Spires Consultant. 3Spires Safety consultants acknowledge that only suitably trained personnel, employees or contractors, will be permitted to work on, or inspect and test electrical equipment. Any observed power tools purchased will be from a recognized manufacturer and CE Marked/conform to European standard.

## **7.10 Exposure to Personal Violence, Harassment or Bullying**

Employees can complain of behaviour that they find offensive even if it is not directed at them. Harassment is "unwanted conduct related to a relevant protected characteristic, which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual". The relevant protected characteristics are age, disability, gender reassignment, race, religion or belief, sex, and sexual orientation. All harassment and bullying will be managed via internal processes and procedures and in line with the 3Spires Safety disciplinary policy.

## **7.11 Fire Safety**

3Spires safety will ensure that all of their consultants that are appointed to advise on matters that are fire related possess the necessary skills, knowledge and experience to do so. Where clients require fire risk assessments then 3Spires Safety will only accept the scope of work subject to observing the complexity of the business, building and processes performed.

Furthermore, 3Spires Safety will ensure that where required its consultants possess fire awareness training for specific industry sectors that determine such a qualification as a pre-requisite. All fire safety related advice should be in line with fire safety reform order, regulations & approved codes of practice.

## **7.12 First Aid**

3Spires Safety will endeavour to provide suitable and sufficient numbers of first aid trained personnel to deal with accidents and injuries at work in line with industry best practice. Where

specific risks exist suitable and sufficient equipment and training will be provided to cope effectively in the case of injury. 3Spires safety consultants will be suitably competent in first aid as to advise End- Clients on how many first aiders they require within their business, the first aid equipment to be made available and the effectiveness of any existing equipment. 3Spires safety consultants must comply with End-Client training matrix's in regards to first aid.

### **7.13 HAVS - Hand Arm Vibration Syndrome**

3Spires Safety consistently supervise the use of plant and use power tools, 3Spires consultants must inspect to be sure that regular maintenance and pre-user inspections are in place at the work environments they visit and where deemed necessary & applicable through risk assessment. 3Spires consultants must aim to identify appropriate control measures to reduce the individuals' exposure to vibration to below the relevant exposure limits.

Where observed workers are exposed to vibration which presents a risk to them, or the exposure limit is likely to be exceeded, the 3Spires consultants must advise that suitable and sufficient information, instruction and training for that workforce is needed. 3Spires consultants aim to understand the levels of vibration through calculators and the manufacturer's instructions of the piece plant/equipment in question.


### **7.14 Hazardous Substances Management**

3Spires Safety consultants are expected to be able to advise on hazardous chemicals and products used at the respective workplaces in which they visit. Consideration of chemical storage, handling, traceability, labelling, risk assessment, PPE and spill mitigation should form part of that advice. Management of chemicals should be advised in line with End-Client's SMS.

### **7.15 Health & Safety Training**

3Spires Safety are committed to zero harm, and as such provide and support health and safety awareness through provision of information and training to their End- Clients workforce and their visitors alike. This starts with the foresight to ensure a detailed induction process that highlights all the possible hazards within work environments and confidence that the appropriate control measures are in place.

Furthermore, all work environments attended should be able to reflect evidence that reading/signing on to the relevant Risk Assessment for all job tasks has been initiated. 3Spires Safety consultants will only be appointed for advising on health and safety matters subject to them possessing applicable insurances, the necessary skills, knowledge, experience, and all the

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pre-requisite qualifications for the industry sector in question. 3Spires safety consultants must comply with End-Client training matrix's to support the job function.

### **7.16 Manual Handling**

Statistics show that manual handling is one of the most common causes of injury in the workplace. Associated injuries often have long-term effects. 3Spires Safety consultants endeavour to reduce the risk of manual handling injuries and to provide guidance on the measures that should be taken to ensure safe lifting and carrying at End-Client sites through:


- Avoiding manual handling where possible and make use of lifting aids where appropriate.
- Ensuring manual handling tasks are appropriately risk assessed and findings communicated.
- Train employees in the control measures of the manual handling risk assessment.
- Job rotation where necessary
- Providing suitable clothing available for all types of seasonal weather and relevant PPE to protect employees from any potentially dangerous materials that come to the premises (e.g. sharps, air borne particles, unlabelled substances)

### **7.17 Noise at Work**

3Spires Safety envisage that high levels of noise directly affects them as a business however we will take all reasonable steps necessary to ensure that the risk of hearing damage is reduced to a minimum. Where noise levels are consistently above 80dB (A) hearing protection will be provided by the 3Spires consultant or the Client before accessing the workplace. 3Spires consultants will be competent in the safe and effective use of PPE, which is mandatory above 85dB (A). Where hearing protection is required signage at the entrance to such work areas should be in place.

### **7.18 Personal Protective Equipment**

Due to all 3Spires consultants being self-employed it is generally expected that once appointed they possess their own certified personal protective equipment (PPE) when the risks presented by a work activity cannot be eliminated or adequately controlled by other means. However this can change from country to country and legislation must be reviewed to ensure legal compliance is met in regards to Contractors versus full time employees.

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In some instances where the consultant and 3Spires Safety have negotiated a specific role that is of long duration then 3Spires Safety may provide the applicable PPE as appropriate to the industry sector in question, it is then expected that the 3Spires consultants ensure it is properly maintained, and the 3Spires consultant possesses adequate information, instruction and training in its use by regularly reviewing existing risk assessments and manufactures instructions. All PPE should be maintained in a clean condition and should be stored when not in use in a manner to maintain its condition and integrity. 3Spires Safety consultants are expected to set an example in regard to PPE application and will at all times respect and comply with End-Client PPE rules & country specific legislation, any 3Spires owned PPE must be returned at the end of the assignment.

### **7.19 Risk Assessment**

3Spires Safety are required, to assess the risks to employees and others arising from work activities. 3Spires Safety commit to following the hierarchy of control in the management of risk; that is eliminate, reduce, isolate and control risks at source not just for their own activities in regard to workplace inspections we perform but also creating risk assessments for our clients that are specific to the nature of the work undertaken through identifying foreseeable risks.

Where elimination, reducing or isolation of risks is not possible the use of PPE, information, training, instruction, and supervision leading to personal discipline will apply. 3Spires Safety endeavor to educate Client employees in the risk assessment process.

### **7.20 Pressurised systems**

There are 2 types of pressurized systems, notably permanent and mobile. 3Spires Safety consistently supervise the use of pressurised systems, our consultants are expected to inspect to be sure that regular maintenance and pre-user inspections are in place at the work environments they visit supported by suitable and sufficient risk assessments.

3Spires safety consultants are expected to be able to advise on whether a written scheme of examination is necessary for the system in which they are observing. 3Spires safety consultants are expected to understand the safe system of work and be wearing PPE as determined through risk assessment when accessing all work environments under pressure.

### **7.21 Working at Height**

Statistics show that falls of persons or materials from height are the most common cause of fatal injury and the second most common cause of major injury to employees. Working at height is

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something 3Spires safety consultants can undertake dependant on the industry sector they find themselves in, offshore Wind Power for example.

All of 3Spires Safety’s consultants are expected take all reasonable steps to provide a safe working environment for those affected by their work at height activities. 3Spires Safety consultants are expected to follow the hierarchy of control for work at height for themselves and the advice they give. They must first be competent to work at height and possess training applicable to the chosen industry, assess if working at height is necessary, or can the task be done by means of a mechanical aid.

A typical example of this is climbing an access ladder inside a turbine. In all possible events of any of our consultants needing to work at height it must be risk assessed, have a emergency response plan where applicable, be documented and all known risks communicated accordingly. 3Spires safety consultants are expected to be wearing PPE that is specific to the work at height activity they wish to perform, it is paramount that the PPE chosen is fit for purpose, accepted by the client, supported by in date certification from a competent person and is in sound working order.

## **7.22 Asbestos**

3Spires Safety historically are unlikely to encounter asbestos due to the unobtrusive nature of our work. 3Spires Safety consultants will always request the asbestos management survey on all pre-2000 buildings/sites. In the event that ACMs are identified they will be recorded onto the Asbestos register and managed as per instruction by competent 3RD party removal contractors. When advising on asbestos 3Spires Safety ensure that they will appoint someone with the necessary skills, knowledge and experience to advise, notably a UKATA appointed person when supporting UK scope of work.

## **7.23 Management of Change**

3Spires Safety demand that ongoing consultation between themselves and the workforce will be maintained throughout, and in particular where a change to approved work scope methodologies, a change in risk factor, simultaneous operations or new personnel are introduced to the work scope. It is integral that such changes are risk assessed and this process is documented. Management of change can be captured through a toolbox talk in order for works to progress whilst the updates to the approved risk assessment can be captured during the operation. 3Spires Safety reserve the right to stop all work immediately when a deviation occurs to what is reflected



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in the approved safe system of work. Considerations for potential management of change are but not limited to –

- Changes of work equipment
- Change of personnel to the working environment
- Simultaneous work scope on neighbouring workstations
- Emergency response scenarios

### **7.24 Management Review**

3Spires Safety shall periodically review its consultants HSE performance to ensure the continuing suitability, adequacy and effectiveness of their advice, to set new targets and reflect on past targets of personal development and to self-educate on consultant findings through lessons learned.

### **7.25 Lone Working**

3Spires Safety shall ensure that no lone working is performed in a place of work that represents considerable risk, only under special circumstances is lone work allowed and in accordance with meticulous risk assessment and communication methods.

Risk assessments are expected to capture the nature of the work, the equipment/machinery, fitness for work, language difficulties and vulnerable persons. The definition of lone working is: when a person works without close or direct contact with others for a significant period of time. When advising on lone work matters 3Spires Safety consultants must ensure that they consider the company's existing approach to lone work as to help advise on specific, measurable achievable and time-bound control measures. Under no circumstances in an offshore environment should anyone be lone working.

### **7.26 Housekeeping**

Excellent levels of housekeeping should be maintained at all times by 3Spires Safety Consultants in all the work environments they frequent as to allow safe access and egress routes minimizing slip, trip and collision hazards as well as the reducing the risk of fire due to additional loading of flammable materials or combustibles.

It is 3Spires Safety's responsibility to ensure that no waste accumulates as a result of their presence in a work environment or excess equipment/materials all surplus materials, equipment and/or waste should be cleared from the premises on an ongoing basis throughout a working day

## **7.27 Lifting Equipment and Accessories**

Lifting equipment includes any equipment used at work for lifting or lowering loads, including attachments used for anchoring, fixing or supporting it. All items of lifting equipment and lifting accessories brought into any work environment to undertake works are required to comply with the statutory requirements. Appointed 3Spires Safety consultants that are directly involved with lifting operations should possess the necessary skills, knowledge and experience to understand and periodically audit the safe system of work, lifting personnel competencies and the lifting equipment/accessories certification for gap analysis.

## **7.28 Contractor Selection**

It is 3Spires Safety policy to ensure all intended contractors otherwise known as consultants adhere to the Sub-contractor 'Approval Process'. This Approval process ensures full vetting of the Sub-contractor to check and confirm their competence relating to their required scope of work prior to any works being undertaken.

Once approved, the Sub-contractor will join the list of 'approved' contractors who will undergo end of year reviews, and feedback will be requested from Clients to ensure their level of competence is at the required level. Once placed on the Sub-contractor approved list and sufficient vetting of the consultant has been accomplished, 3spires Safety are able to formally place an order to the Sub-contractor for their services. Reasons for selection failure include but are not limited to the following:

- Insurance Coverage
- Inadequate CV & experience
- Poor Feedback/referrals
- Previous applicable convictions or fines that may affect their work.
- Industry HSE performance or Investigation from Regulatory Bodies
- Insufficient Training & Competencies.
- Failure to adhere to the 3Spires Safety approved safety management system.
- Failure to agree to the 3Spires Safety Sub-contractors' selection procedure.
- Failure to agree to 3Spires Safety & End-Client SMS's.

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## **7.29 Biological Agents**

3Spires Safety will ensure that their consultants are competent commit to risk assessing against legionella in permanent water system and air conditioning units. 3Spires consultants must refrain from drinking untreated water at the work environments they visit. It is expected that of our consultants liaise directly with the Clients upon their arrival at site as to understand where the appropriate welfare facility's and drinking water reside. 3Spires consultants must use adequate PPE whilst offshore or working quayside as to protect themselves from bird guano.