

# Safety, health and environmental procedures

## Policy, organisation and arrangements

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## **INTRODUCTION**

This document sets out the Safety, Health & Environment (SHE) Policy adopted by Kier Group plc.

The directors and appointed officers of Kier Group plc are referred to as “The Board”.

This Safety, Health & Environment (SHE) Policy applies to work carried out by Kier Group Divisions and Companies.

## **Health and Safety Policy Statement**

Kier Group is committed to providing a work environment that is safe and healthy for all employees and those affected by our activities. Kier Group's operations shall be carried out so as to ensure, so far as is reasonably practicable, that the Health, Safety or Conditions of any person or property will not be adversely affected.

The Board is actively committed to the provision of strong and active leadership in such matters, the engagement of the workforce in the promotion and achievement of safe and healthy conditions and the formal assessment and review of the Kier Group's performance. The Board will provide adequate resources, information and training to ensure that the Management Teams can deliver the objectives set by the Board for continuous improvement throughout the business.

This Policy is implemented via the policies of the individual divisions and companies of Kier Group. Divisional and company boards of directors are responsible for ensuring that standards and objectives set in the Kier Group Health & Safety Management System, held by each business, are delivered locally to appropriate business sector requirements.

The requirements of the Health & Safety Policy are communicated to all employees and the involvement of all individuals within Kier Group in the management of health and safety is actively promoted through effective consultation and involvement.

The Health, Safety and Welfare of all employees and those who may be affected by our work is an integral part of our business performance. Compliance with legal requirements should be achieved at all times, and no breaches should be tolerated.

The Board shall review this policy and associated Management System, periodically taking action if necessary to ensure its effectiveness and compliance with changes in the nature of the Kier Group's operations and structure, legislation, best practice and procedures.

*Signed originals on headed paper are held  
at Tempsford Hall for audit purposes only.*

**M P Sheffield**  
**Chief Executive**  
**For and on behalf of Kier Group**  
**April 2010**

## **Environmental Policy Statement**

Kier Group is committed to conducting its business in a manner that is both professional and ethical whilst paying particular attention to its environmental responsibilities. These responsibilities will be discharged by implementing the following:

- The identification and then strict compliance with the letter and intent of all relevant legal and other requirements
- The provision of training to raise the awareness of those aspects of our business, which have an impact on the environment
- The effective communication of the responsibilities of the Group, our staff and those under our control, to ensure that a high standard of environmental care is maintained at all times
- The organisation of our operations in order to minimise pollution and disturbance to our neighbours and the general public
- Protection of flora & fauna and their habitats at our offices and depots and on sites where we hold responsibility or can influence those that do
- The efficient use of materials and resources with particular regard to the long-term sustainability of consumable items
- Minimising the need to travel but where travel is unavoidable, consider taking the least environmentally damaging mode of transport
- The establishment and maintenance of management structures within our operating companies and divisions with specific responsibility for the implementation of environmental policy
- The establishment of targets against which to measure the improvement in our environmental performance in key areas, including energy use and waste
- Regular management reviews of the content and implementation of the environmental policy, to ensure improvement in performance through the adoption of best practice, provision of training and raising awareness
- The introduction of environmental criteria to assess the commitment to sustainable procurement of our supply chain

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Chief Executive  
For and on behalf of Kier Group plc  
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## PART 2 – ORGANISATIONAL RESPONSIBILITIES

### 2.1 The Board shall:

- 2.1.1 have collective overall responsibility for Safety, Health and Environmental (SHE) matters;
- 2.1.2 ensure they receive adequate training to maintain their knowledge and understanding of current SHE duties;
- 2.1.3 identify and understand the significant risks created by Kier's changing and expanding activities in so far as these might adversely affect the safety and health of our workforce and others, and the environment;
- 2.1.4 support and assist the Chief Executive in their role by providing strategic direction for the effective management of SHE responsibilities and review and endorse Group SHE strategies;
- 2.1.5 ensure the development of SHE documentation based upon risk assessment that meets legal requirements and industry best practice, and is in accordance with Kier's SHE policy and its associated arrangements;
- 2.1.6 ensure that an Occupational Health Strategy is established in each operating company, which will include appropriate health surveillance, sickness absence management and rehabilitation and return to work arrangements;
- 2.1.7 take the lead in ensuring the effective communication across the Group of SHE duties and the benefits of good performance in this regard;
- 2.1.8 ensure that suitable resources and strategic direction to discharge Kier's SHE responsibilities is provided;
- 2.1.9 set the Group's objectives and review performance against them;
- 2.1.10 appoint a Director from among their number at Group Board level and within each Division and Operating Company who shall be the focus for reporting to the relevant board on SHE matters to include incident data and preventive information;
- 2.1.11 ensure arrangements are in place to assess and monitor the performance of Kier's suppliers and contractors/subcontractors;
- 2.1.12 review the overall performance and effectiveness of Kier's SHE management system, and ensure arrangements are made for any significant weaknesses to be addressed;
- 2.1.13 ensure staff and their representatives are involved and consulted on relevant SHE matters and ensure that their views are considered;
- 2.1.14 review and amend this policy as appropriate.

### 2.2 Managers shall:

- 2.2.1 comply with at all times, and promote where possible, Kier's SHE management system and associated documentation;
- 2.2.2 ensure work-related hazards are identified and suitable and sufficient risk assessments are undertaken to eliminate or, where that is not reasonably practicable, reduce those risks;
- 2.2.3 ensure that the Occupational Health Strategy is implemented in each operating company through active management of health, including health surveillance and sickness absence management;
- 2.2.4 develop where applicable project/location specific procedures and safe working practices in line with legislative requirements, Kier and Company documentation and local risk assessments;
- 2.2.5 ensure that all their staff, contractors/sub-contractors, visitors, etc have access to adequate welfare facilities;

- 2.2.6 ensure that they and all their staff have an adequate level of competence, supervision, instruction and information to complete their work tasks safely, this includes access to Kier SHE documentation;
- 2.2.7 ensure that all local SHE systems of work are appropriately maintained;
- 2.2.8 report and investigate SHE incidents as necessary;
- 2.2.9 ensure that work locations are regularly inspected and audited and that any failings identified are remedied without delay;
- 2.2.10 ensure the proper selection and adequate management of suppliers and contractors/subcontractors.

### **2.3 Site Managers/Supervisors shall:**

- 2.3.1 organise all works to maintain a working environment that is safe and without risk to health in accordance with Kier's SHE management system;
- 2.3.2 maintain means of access to and egress from places of work that are safe and without risk to health;
- 2.2.3 arrange for work to be undertaken to avoid as far as is reasonably practicable, unnecessary ill-health effects from substances and/or activities;
- 2.3.4 ensure, so far as is reasonably practicable, the proper use of welfare facilities;
- 2.3.5 provide comprehensive instruction to all employees and contractors/subcontractors on responsibilities for SHE working methods and ensure that they take all reasonably practicable steps to prevent unsafe conditions or unsafe acts from occurring;
- 2.3.6 provide information to promote healthy and safe working methods and prevent damage to the environment, this includes Kier's SHE documentation;
- 2.3.7 ensure that employees and contractors/subcontractors are provided with effective consultation;
- 2.3.8 provide reports as requested on the effectiveness of SHE performance to directors responsible for SHE.

### **2.4 Employees shall:**

- 2.4.1 work with reasonable care to ensure the health and safety of themselves, others and the environment;
- 2.4.2 ensure they understand the instructions provided and work in strict accordance with those instructions and the relevant training they have undergone;
- 2.4.3 take care of their health through correctly using equipment, materials and controls, co-operating with measures used to minimise ill-health including participating in health surveillance, early reporting of concerns, wearing of PPE as identified by risk assessment of the activity;
- 2.4.4 co-operate with those allocated with SHE responsibilities;
- 2.4.5 report problems and deficiencies related to SHE.

### **2.5 SHE Team shall:**

- 2.5.1 advise on Occupational Health Strategy and provide support to operating companies in its delivery;
- 2.5.2 advise Kier on new legislation, approved codes of practice and similar guidance, and their impact on the organisation and arrangements for health, safety and environmental management and the individual and collective responsibilities faced by employees and supply chain;
- 2.5.3 update Kier on any significant SHE incidents;

- 2.5.4 facilitate annual SHE review and monitoring of Kier and its Companies;
- 2.5.5 facilitate independent SHE audits within the Group;
- 2.5.6 assist in compiling the annual assessment report on SHE performance for the Kier Board;
- 2.5.7 co-ordinate the issuing of advice to Kier on urgent SHE issues requiring immediate action;
- 2.5.8 liaise, where required, with the HSE, EA and other external bodies on SHE issues;
- 2.5.9 undertake investigation of serious incidents to ensure all learning points are transmitted across the group.

## **2.6 Contractors and Partners shall:**

- 2.6.1 effectively and efficiently co-operate and communicate with Kier on all relevant SHE matters;
- 2.6.2 meet the SHE standards required of them in the performance of the work activities undertaken with or on behalf of Kier;
- 2.6.3 ensure those they employ are fit to undertake their duties.

## **2.7 Safety Representatives (both Trade Union and Staff) are able to exercise their rights to:**

- 2.7.1 undertake investigations for reportable incidents;
- 2.7.2 represent the views of the staff to managers and to the Health and Safety Executive inspectors;
- 2.7.3 undertake inspections of the workplace;
- 2.7.4 raise Occupational Health concerns for resolution.

## **PART 3 – SAFETY, HEALTH AND ENVIRONMENTAL ARRANGEMENTS**

### **3.1 Key elements**

The key elements of Kier's SHE arrangements are:

- 3.1.1 a systematic approach to risk management;
- 3.1.2 appropriate Occupational Health planning, management and interventions where necessary;
- 3.1.3 minimisation of waste at source and the promotion of 'reduce, reuse and recycle';
- 3.1.4 diversion of construction waste, whenever feasible, away from landfill;
- 3.1.5 contribution to nature, conservation and the enhancement of the natural environment whenever feasible;
- 3.1.6 provision of information, instruction, supervision and training sufficient to enable staff to carry out their duties safely and effectively;
- 3.1.7 monitoring compliance with and regular reviewing of the effectiveness of SHE arrangements;
- 3.1.8 investigation and review of all SHE incidents;
- 3.1.9 regular auditing;
- 3.1.10 provision of adequate funding, resources and expert advice.

Further information on Safety, Health and Environment arrangements are contained within Kier's SHE Management Systems (KGSHEMS), the primary elements of which are identified in the flowchart in Appendix A.

### 3.2 Documentation

**Level 1:** The Group documentation is in the form of Policy, Procedures and Standards.

The Kier Procedures will be used where cross Company systems and documentation are needed e.g. incident reporting, CDM, Occupational Health, fire safety, and waste management.

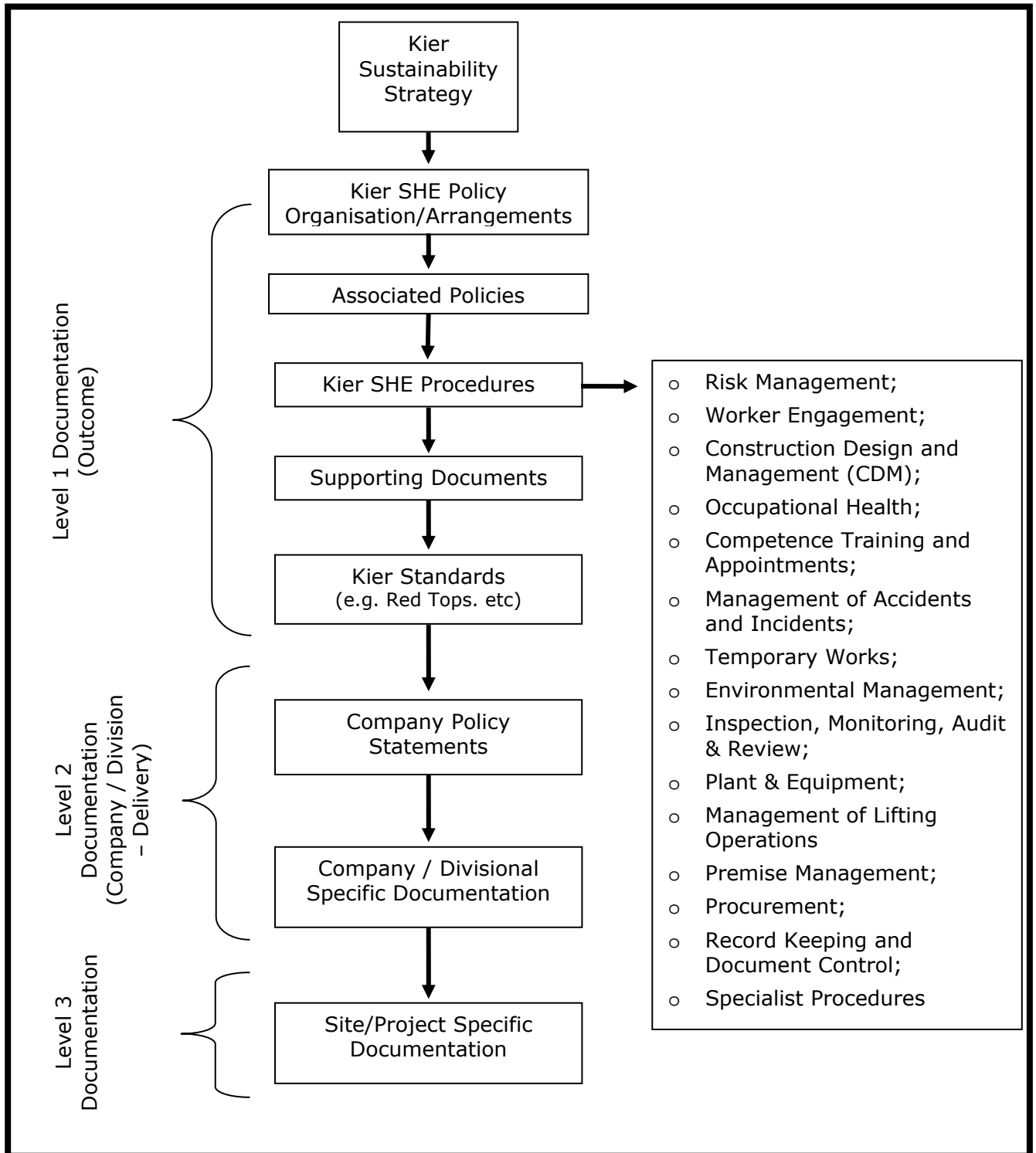
The Kier standards set out who is responsible and minimum expectations for compliance for the subject covered and these will be delivered where appropriate via Kier standards (e.g. Red Tops)

***It is mandatory for all Kier Companies/Divisions, which include Contractors/Subcontractors working on its behalf, to meet the requirements of Kier's Policy, Procedures and Standards.***

**Level 2:** Company/Division specific documentation must meet, as a minimum, the requirements set out in Kier's documentation and take the form of procedures and guidance for managers and staff working for the specific Company/Division.

**Level 3:** Local documentation and procedures that cover safety, health and environmental matters unique to a premise, building, workplace, site, location, project or task. These include Risk Assessment, Method Statements, registers, records of inductions, toolbox talks etc.

**APPENDIX A:  
KIER SAFETY, HEALTH & ENVIRONMENTAL DOCUMENTATION**



## **APPENDIX B: KIER DIRECTORS AND SENIOR MANAGERS CODE OF PRACTICE – LEADING SAFETY, HEALTH AND ENVIRONMENT AT WORK**

Health and safety is a key core value for all within Kier.

Kier recognises health and safety is integral to its present and future success and requires the commitment, innovation and determination of all its Directors and Senior Managers to ensure the continual improvement of health and safety performance.

Health and safety is considered by Kier to be an essential measure when determining effective management. It is, therefore, required that all Kier Directors and Senior Managers actively engage to ensure health and safety management, performance and overall culture is a mainstream business deliverable.

The Health and Safety at Work etc Act 1974 and the supporting Regulations made under the Act place duties on employers to put into place effective safe systems of work, safe places of work and to proactively plan for health and safety.

In particular, Section 37 of the Health and Safety at Work etc Act 1974 states that a company's officers which includes Directors, Managers or any other Officers can become liable for any breaches of duty which are imposed by the Act.

This Code has been designed as a tool kit comprising of HSC's "Leading health and safety at work" and a checklist to assist Kier Directors and Senior Managers meet the core and best practice actions which have been endorsed by the Institute of Directors.

### **POSITIVE SAFETY LEADERSHIP**

To add support to our Policy, organisational arrangements and the IOD guidance listed above Kier has embarked on a Positive Safety Leadership programme. The aim of this programme is to engage with all members of staff and supply chain to recognise unsafe working practice and to take action to rectify issues and give guidance to prevent recurrence. When safe working practice is found it is recognised and used to encourage others. All Divisions are to have a SUSA (Safe and Unsafe Acts) Programme that is measured as a KPI by senior management.

Initial findings show that regular SUSA discussions help to dramatically lower incident rates.



<b>NECESSARY ACTION</b>		<b>WHAT OBJECTIVE EVIDENCE DOES KIER EXPECT?</b>
3.	<b><i>Management access to competent SHE advice</i></b>	<ul style="list-style-type: none"> <li>• SHE Manager / Advisor to:               <ul style="list-style-type: none"> <li>▪ Be part of monthly, quarterly and annual reviews</li> <li>▪ Contribute to any SHE management and improvement programmes</li> <li>▪ Attend tender meetings as appropriate</li> <li>▪ Have as a minimum monthly SHE meetings with SHE Director</li> <li>▪ Report changes in working arrangements that have significant implications for SHE performance</li> <li>▪ Report changes of regulatory, best practice and Kier SHE arrangements</li> <li>▪ Ensure Occupational Health Support arrangements are effective in resolving health related issues</li> </ul> </li> </ul>
4.	<b><i>Provision of training</i></b>	<ul style="list-style-type: none"> <li>• Provision of a training matrix detailing training needs based on workforce needs</li> <li>• Provision of a training matrix detailing training needs of Directors and Senior Managers to fulfil responsibilities both safely and professionally</li> <li>• Provision and attendance on regular workshop and awareness raising programmes</li> <li>• Evaluation of training provision to ensure it meets required expectations</li> <li>• Providing regular tool box talks to increase awareness and effectiveness of safety working practices</li> <li>• Occupational Health training to be integrated at all levels</li> </ul>
5.	<b><i>Consultation with workforce</i></b>	<ul style="list-style-type: none"> <li>• Where necessary implementation of constituted safety committees</li> <li>• Use and recording of UKCG 3 tier strategy for construction projects, workplace consultations at project level, workgang level and individual level</li> <li>• Utilisation of workforce feedback schemes</li> <li>• Engage supply chain to collate their considerations on SHE performance</li> </ul>
6.	<b><i>Risk Management</i></b>	<ul style="list-style-type: none"> <li>• Organisational and operational risks to be main part of Company risk registers (Internal Audit document)</li> <li>• Occupational Health risk management to be included in company risk registers</li> <li>• Risk registers to include details of control measures, action timelines, responsibility for action and residual risk</li> </ul>
7.	<b><i>Performance Targets and Benchmarking</i></b>	<ul style="list-style-type: none"> <li>• Reporting and comparing performance against Kier set targets.</li> <li>• Utilising APR scoring to create local benchmarking</li> <li>• Occupational ill health to be reported against set targets</li> <li>• Benchmarking with external bodies where this is possible</li> </ul>