



Health and Safety Policy

Tower Cranes / Transport / Power Generation / Spray Painting / Shot
Blasting / Fabrication / Training and Contract Lifting

The Falcon Group Services Ltd
Shipdham Airfield Industrial Estate
Shipdham, Thetford, IP25 7SD

Policy Statement

Falcon Group Services Limited is committed, in accordance with the Health and Safety at Work etc. Act 1974, to protecting the health, safety and welfare of our employees and all others who may be affected by our operations. We believe that a positive health and safety culture and active management of risk contribute to success.

Our aims and objectives are achieved through the following organisation and arrangements:

Resources – we will allocate sufficient resources to meet the requirements of current legislation and management systems. Quality, Health, Safety and Environmental (QHS&E) policies and standards (including procedures and work instructions) will be defined, documented, implemented, and maintained.

Management - Managers will understand how they influence the QHS&E culture within their areas of responsibility, demonstrate that HS&E issues are important to them, seek continual improvement in HS&E performance, lead by example, and support the development and continual improvement of the Integrated Management System (IMS)

Responsibilities - we have defined HS&E responsibilities which are allocated and monitored.

Health and Safety Management - An HS&E management structure will be implemented to support the delivery of HS&E policies, systems, objectives and targets, to review HS&E performance and respond to significant HS&E incidents. In addition, we will secure access to competent advice as required.

Risk Assessment – We identify hazards, assess risks and determine appropriate control measures. Assessments are reviewed regularly to ensure they remain relevant and that control measures continue to be effective

Training – Our employees are trained in safe working practices and procedures. Where persons are required to carry out specific tasks, they will be provided with the necessary training.

Consultation – We promote an open and proactive approach to Health, Safety and Environmental (HS&E) matters and foster a just culture where employees are encouraged to report hazards, concerns, incidents, and any areas where this policy may be inadequate without fear of unfair blame. All issues raised are taken seriously, considered fairly, and used to support continual improvement..

Checks and Inspections – Our managers and Supervisors carry out checks and inspections to confirm that suitable precautions are in place and to identify any scope for improvement.

Reviewing and Learning – We prioritise, plan and complete any corrective actions required to reduce risk to an acceptable level. Progress is reviewed, and any required improvements are identified.

Revisions – Systems, policies and procedures will be regularly reviewed (at least annually) to ensure they reflect legal responsibilities.

- HSE laws, regulations, approvals, licenses and other legal requirements
- Industry codes and best practices
- Contractual requirements
- International, national and regional standards
- Other interested parties

This document incorporates:

Falcon Tower Crane Services Limited, incorporating Falcon Power Generation, Falcon Contract Lifting, Falcon Paint Shop, Falcon Fabrication, Falcon Training, Falcon Freight Limited and Robert Harwood Trading (East Anglia) Limited

Andrew Brown
Managing Director
The Falcon Group Services Ltd
July 2026

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Organisation and Arrangements for Health and Safety

Resources and Management

We follow HSE recommendations on managing Health and Safety and our systems are therefore based on the principles of Plan, Do, Check and Act. Annual plans are established, resources allocated, and we carry out ongoing risk assessments and checks to ensure that standards are being maintained. *ref: INDG417(rev1).*



Primary responsibility for securing QHS&E across our operations rests with directors, managers and supervisors working in cooperation with employees and contractors.

The effectiveness of our policy is dependent upon ALL our employees and others involved in carrying out our activities. We seek to build a culture that actively encourages sound health, safety and environmental practices through engaging with our employees and those to whom we have a duty of care. *The Health and Safety at Work etc. Act 1974*

This policy applies to all employees, contractors, visitors and other persons attending our workplaces and work sites. Everyone is encouraged to report any breach of health and safety requirements, unsafe condition, or potential hazard to their manager or supervisor.

We carry out ongoing risk assessments for depot and client site work activities. The significant findings, including the required controls, are recorded and communicated to staff.

This procedure is continuous, and assessments are updated as required by situations or statutory requirements. Due to the nature of our core business activities, particular attention is given to the following areas:

- Plant
- Working at Height
- Power Generation
- Under Hook Accessories
- Transport

The control measures adopted for the cranes we supply and for our work on construction projects are based on the Construction Plant-hire Association (CPA) Tower Crane Interest Group Best Practice Guidance and Technical Information Notes (TINs). We follow best practice guidance from British Standards 7121 parts 1 – 5. The health and safety standards for activities at our storage and maintenance facilities are contained in HSE Guidance for Engineering Workshops and other HSE publications.

Our Road Haulage division specialises in the transport and logistics of tower crane components, self-erecting tower cranes, ballast (including test weights), rigging mats, containers and cabins. Licensed by the Traffic Commission and The Driver and Vehicle Standards Agency.

Our generator division runs a fleet of over 300 stage IIIA-compliant sets, plus 250, 500, 1,000, 2,000, and 3,000-litre fuel tanks together with a large range of ancillary items such as distribution boards and cabling. In addition, the company has its own crane-mounted trucks for ideal delivery and placement.

All persons must be trained to perform tasks effectively and safely. Our employees are trained in safe working practices and procedures prior to working on-site. Where employees are required to carry out key tasks, we provide



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The Falcon Group Services Ltd
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the necessary further training. Formal and informal training is carried out, and employees are encouraged to identify areas where they feel they require training or retraining in H&S matters. Records will be maintained of individuals' training and competency. Contractors must demonstrate that their employees have the necessary training and proof of competency.

Consultation with our employees is essential to maintaining an effective health and safety culture across the Group, particularly before introducing new procedures, equipment, or technology that may affect working practices. We consult on a formal and informal basis according to the matters being relayed. In addition, we aim to work with client Health and Safety representatives and other persons so that relevant information and documentation is always shared and communicated to ensure the safe working of all parties.

Contractors whom we engage are required to ensure their employees are trained and that their own risk assessments and safe working documentation are available for inspection.

Consultation between the workforce, senior directors and managers takes place in accordance with *The Health and Safety (Consultation with Employees) Regulations 1996*, with meetings held every six weeks to discuss health and safety issues. Any issues that cannot be resolved by the committee in consultation with the relevant line managers shall be escalated to the Managing Director for consideration and a final decision.

Managers and supervisors are responsible for carrying out regular inspections and monitoring work activities to ensure that control measures remain effective and to identify opportunities for continual improvement in the management of health and safety risks.

The findings of inspections and monitoring activities are reviewed to assess the effectiveness of existing controls and to identify improvements to the Health and Safety Management System. Performance is also reviewed through feedback received during meetings with clients, architects, the Principal Designer, and other relevant stakeholders. Any recommendations or corrective actions arising from these reviews are investigated, and appropriate measures are implemented.

Managers are responsible for encouraging employees and subcontractors to raise health and safety concerns and for ensuring that these are investigated and addressed promptly. All accidents, incidents, and near misses are reported, monitored, and reviewed to identify root causes and implement appropriate corrective and preventive actions to reduce the risk of recurrence.

The Group has a duty of care to comply with all applicable health and safety legislation and to effectively manage and control workplace risks, including protecting employees, contractors, visitors, and other affected parties from the risks associated with pandemic or infectious disease outbreaks. The Group is committed to providing and maintaining a safe and healthy working environment.

The Group will assess the risks presented by any pandemic or infectious disease and implement proportionate control measures to minimise the risk of transmission and protect the health, safety, and wellbeing of those affected, while maintaining business operations where reasonably practicable.

In the event of a pandemic or other significant infectious disease outbreak, the Group will develop and implement a bespoke Business Continuity Plan, in accordance with Section 14 of this Management Plan, to ensure the continued delivery of critical business activities while safeguarding the health and safety of employees and other stakeholders.

The Falcon Group has considerable H&S expertise within the team to assist with all issues.

The Management System will be reviewed at least annually, or more frequently where required due to changes in legislation, regulations, business operations, organisational structure, or other significant factors, to ensure its continued suitability, adequacy, and effectiveness.

The outcomes of each review, including significant findings, recommendations, and agreed actions, will be documented, communicated where appropriate, and implemented within the agreed timescales. Progress against these actions will be monitored to ensure continual improvement of the Management System.

Responsibilities for Health and Safety

Owner: Health and Safety Dept	Version: 5	Issue Date: July 2023 Reviewed: 31/07/2026	FPD 018
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Managing Director

- a. Ensure H&S policy, Organisation and arrangements are in place and promulgated.
- b. Review resource allocation and be satisfied that it is sufficient.
- c. Agree on overall plans, strategy, and annual objectives.
- d. Promote a strong and positive safety culture within the workforce *FALCON0174, FALCON0153*
- e. Arrange for the board and senior managers to review performance.
- f. Arrange for sufficient HS&E resources to be appointed and specialist assistance to be available.
- g. Stay abreast of developments.
- h. Review reports and remedial measures taken.
- i. Review the outputs from checks and inspections.
- j. Assist managers and others in meeting their duties under this policy.
- k. Ensure arrangements are in place for consulting employees.
- l. Report to the Board on any matters requiring consideration.

Directors and Senior Managers

This category includes Directors, Associate Directors, Depot Managers, Departmental Senior Managers and Operator Controller.

These individuals shall understand how they influence the HS&E culture within their areas of responsibility, demonstrate that HS&E issues are a priority, continually seek to improve HS&E performance, and lead by example.

- a. Inform the MD of staff training needs and attend to personal training required.
- b. Promote a strong and positive culture and set a good personal example.
- c. Take action when unsafe acts or conditions are observed.
- d. Consult staff and others on their ideas to improve health and safety.
- e. Carry out or assist in undertaking risk assessments.
- f. Implement the control measures specified in risk assessments.
- g. Carry out regular checks on compliance with control measures required.
- h. Provide supervisors with guidance on expected actions.
- i. Report, investigate and suggest action to prevent.
- j. Provide monthly H&S updates to MD.

Managers and Supervisors

This category includes Depot Supervisors, Erection Supervisors, Electrical Supervisors and any other positions involved in supervising the work of others. These positions require the following in relation to activities under their control:

- a. inform the manager of staff training needs and attend to personal training required.
- b. promote a strong and positive culture and set a good personal example.
- c. provide staff with daily instructions on safe working.
- d. take action when unsafe acts or conditions are observed.
- e. consult staff on their ideas to improve health and safety.
- f. assist in undertaking risk assessments.
- g. implement the control measures specified in risk assessments.
- h. carry out regular checks on compliance with control measures required.
- i. discuss health and safety problems and successes with manager.

Group Health, Safety and Environmental Manager

- a. Carry out full investigations into all accidents and incidents, ensuring that findings, corrective actions and close-out records are completed.
- b. Report the findings of all formal and informal Health & Safety inspections to Director level
- c. Promote a strong and positive health and safety culture and set a good personal example.
- d. Carry out dynamic risk assessments.
- e. Maintain the records of substances used and assessments; *Control of Substances Hazardous to Health 2002 (COSHH)*
- f. Report matters to HSE as required and prepare accident and incident data; *RIDDOR - Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013*
- g. Amend as required by the board and keep documents updated.



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- h. Ensure standards, procedures and key controls remain fit for purpose, reflect legislative and regulatory requirements and effectively manage HS&E RISKS.

All Employees

- Stop working if you feel unsafe and inform your manager or supervisor.
- Take reasonable care of the health and safety of self and others affected.
- Make full use of protective clothing/equipment/plant provided.
- Refrain from interfering with plant, equipment, apparatus etc. where such interference could be detrimental to health and safety.
- Undertake training provided and ensure mandatory training is kept up to date.
- Follow supervisors/manager instructions and observe company systems.
- Inform your supervisor or manager of any other health and safety concerns or ideas for improving health and safety.

General Arrangements

Accident Investigation

The relevant line manager or other nominated person will carry out a thorough investigation into every accident, dangerous occurrence or significant near miss to identify root causes and prevent recurrence.

Accidents will be investigated to ensure that suitable controls are implemented, and safe systems of work are adopted to prevent a recurrence, eliminating hazards where reasonably practicable and reducing risk to the lowest practicable level.

The accident book will be viewed on a regular basis with details analysed to assess trends for possible amendments to working practice. Accidents will also form part of the agenda at committee meetings where they will be reviewed, and statistics analysed.

Accident Procedure and RIDDOR

The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013(RIDDOR) require the reporting of defined accidents, diseases and dangerous occurrences.

We ensure that there are sufficient competent trained First Aiders to meet the risks of first aid requirements and that there are well-maintained First Aid Facilities in accordance with *The Health and Safety (First Aid) Regulations 1981*.

All accidents, incidents, and work-related injuries must be reported to Head Office without delay and recorded in the Accident Book or the Company's designated reporting system.

Where an incident meets the reporting criteria of the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR), the statutory notification to the relevant enforcing authority will be coordinated and submitted by the Health and Safety Department.

Smoking Policy

The Falcon Group recognises the prevailing attitudes against smoking and the potential effects of "passive smoking" on the health of others. Smoking also greatly increases the fire risk within premises. Individuals most likely to be affected by passive smoking include those who:

- Suffer respiratory ailments.
- Are "sensitised" by previous exposure to tobacco smoking.
- Wear contact lenses or glasses

It is therefore the Group's policy to prohibit smoking. The ban applies to anything that can be smoked and includes but is not limited to cigarettes, electronic cigarettes, pipes (including water pipes such as shisha and hookah pipes), cigars and herbal cigarettes.

- In all buildings
- In all company-shared vehicles and pool vehicles
- Points of access to and egress from Falcon's buildings
- In all enclosed workplaces including crane cabs

The Falcon Group will:

Owner: Health and Safety Dept	Version: 5	Issue Date: July 2023 Reviewed: 31/07/2026	FPD 018
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- Display 'No-Smoking' signs in smoke-free premises and vehicles and cabs
- Take reasonable steps to ensure that staff, customers/members and visitors are aware that premises and vehicles are legally required to be smoke-free.
- Remove any existing indoor smoking rooms.
- Ensure that no one smokes on smoke-free premises or in vehicles.

Anyone found smoking in a designated "No Smoking" area will be instructed to extinguish the cigarette immediately, and disciplinary action may be taken.

Drugs and Alcohol Policy

The Falcon Group is committed to providing and maintaining a healthy, safe, and productive working environment for all employees, contractors, and others who may be affected by its activities. The Group recognises that the misuse of alcohol or drugs can impair an individual's judgement, performance, and ability to work safely, increasing the risk of accidents, injuries, and harm. Accordingly, the Group is committed to maintaining a workplace that is free from the inappropriate use of alcohol and drugs, enabling all personnel to carry out their duties safely, competently, and efficiently.

Many of the Group's activities are classified as safety-critical, where a failure to perform a task safely could result in serious injury, ill health, environmental damage, or significant harm to employees, contractors, members of the public, or others. The Group therefore expects all personnel engaged in safety-critical work to report for duty free from the effects of alcohol, illegal drugs, or any other substance that may impair their ability to work safely..

The Falcon Group operates a zero-tolerance policy towards the misuse of drugs and alcohol.

1. The consumption of drugs and alcohol by employees is inappropriate at any time when working or before work whenever work performance could be adversely affected.
2. The use of drugs is inappropriate at any time when working or before work whenever work performance could be adversely affected.
3. The use of drugs prescribed by a doctor, which may affect your ability to perform your job, must be notified in confidence to the Managing Director. Temporary impaired performance may require temporary redeployment.
4. The use of non-prescribed 'over the counter' medication, which may cause drowsiness or loss of coordination, must be reported to your Managing Director.
5. Dispensing, distributing, possessing, using, selling or offering to buy controlled drugs at work is prohibited. Any such activity (including reasonable suspicion of it) on the company's or our customer's premises will be reported to the police immediately.
6. Any employee found to be in breach of this policy may be subject to disciplinary action, which may include summary dismissal for gross misconduct.
7. To assist in the effective implementation of this policy, the Group reserves the right to have tests carried out on individuals following any incident where there is suspicion that drugs and/or alcohol may have been a contributory factor.
8. The Group reserves the right to search employees or their property held on the Group's or its customer's premises at any time if there is a suspicion that the prohibition on drugs or alcohol is or has been infringed.
9. Refusal to consent to testing or search will be treated as gross misconduct under the Disciplinary Procedure and may result in the termination of employment without notice.
10. Where an employee is placed on a contract where more stringent terms apply, then the more stringent terms will prevail over those contained within this policy. Any employees in this situation will be provided with a copy of the more stringent policy when placed on a contract to which it applies.
11. The Group reserves the right to send an employee home if it believes that they are under the influence of drugs or alcohol.

Employees must not:

- Report or try to report for work under the influence of drugs, having just consumed alcohol, or be in an unfit state due to the use of drugs or alcohol.

Remember you will fail the alcohol test if your blood (measured by testing a urine/blood sample) contains 80 milligrams per 100 millilitres of blood, which is the legal limit for driving.

- Be in possession of controlled drugs in the workplace without having reported the fact to your manager in accordance with clause 3 above.

Owner: Health and Safety Dept	Version: 5	Issue Date: July 2023 Reviewed: 31/07/2026	FPD 018
----------------------------------	---------------	---	----------------

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- Be in possession of any illegal drugs whilst in the workplace.
- Consume drugs or alcohol while on duty, which includes 'on call'.
- Attend training or assessment events while under the influence of drugs or alcohol.
- Failure/Refusal of a drugs and alcohol test (including non-attendance)
If an employee refuses to take a drug and/or alcohol test or they take a test and the result is positive, then they will be subject to the Group's disciplinary procedure, which may include dismissal without notice on the grounds of gross misconduct.

To ensure compliance with this policy, you can be required to undergo testing in the following circumstances:

Pre / Existing Employment:

New employees may be required to pass a drugs and alcohol test before an offer of employment is confirmed.
All employees.

Random:

A percentage of employees may be screened each year. These persons will only receive 48 hours' notice, both verbal and written, before they are due to attend screening.

For cause:

Drug and/or alcohol screening may be carried out following an accident, incident, or near miss where there are reasonable grounds to believe that an individual's actions or omissions may have contributed to the event, or where their behaviour, appearance, or conduct gives reasonable cause to suspect that they are unfit to continue working safely.

Transfer:

The screening will be carried out if a person is transferring or being promoted to a post involving safety-critical work, or activities that affect safety-critical work.

All drug and alcohol testing will be carried out by a competent, nationally accredited testing provider using recognised procedures and standards. Testing will be conducted in a manner that safeguards the dignity, privacy, confidentiality, and legal rights of the individual at all times, while ensuring the integrity and reliability of the testing process.

Right of appeal

If following a positive screen result you feel that you have grounds to appeal, you must do so first through the Managing Director in writing, within five working days.

Employee Responsibilities

In addition to your responsibility not to report or try to report for work under the influence of drugs, having just consumed alcohol, or be in an unfit state due to the use of drugs or alcohol.

You must:

1. Advise your Manager or Supervisor if you are taking any medication before you report to work.
2. Declare any medication and if possible, produce the original packaging to the screening officer before you are tested.
3. Advise your Manager or Supervisor if you have any reason to believe that you might have accidentally consumed drugs.

If you need help

The Falcon Group is committed to supporting employees who believe they may have developed, or are developing, problems relating to drugs or alcohol. In the first instance, you should approach the HR Associate Director or the Managing Director in the strictest confidence.

Asbestos

Working with asbestos will normally be outside the parameters of the work undertaken by the company; however, any work involving asbestos in any form will be managed in accordance with [*The Control of Asbestos Regulations 2012*](#). Any materials used or encountered that contain, or are suspected to contain, asbestos must be assessed and managed by competent persons before work continues.

Owner: Health and Safety Dept	Version: 5	Issue Date: July 2023 Reviewed: 31/07/2026	FPD 018
----------------------------------	---------------	---	---------

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Asbestos – Dealing with Unidentified Asbestos

The owners of buildings have a duty to investigate and make safe any areas where the presence of asbestos is known or suspected. However, the presence of asbestos is not always obvious. The HSE have advised that it is sensible to assume that any building constructed or refurbished before the 1980s will contain asbestos materials, i.e., insulation boards, corrugated roof sheets, cement guttering and boilers and associated pipework and lagging. No work should be carried out which is likely to expose employees to asbestos unless an adequate assessment of exposure has been made. They must then call in a competent person or specialist asbestos analyst to assess the material to confirm if it is asbestos.

If asbestos is confirmed, then a licensed contractor may be required to protect and remove the asbestos to a licensed waste disposal facility. Once the asbestos has been made safe or removed, other contractors will be advised and clearance certificates will be available. Work will then continue with caution lest any further unidentified asbestos is found.

The Falcon Group Vehicles

Group Cars Policy

We recognise that requiring staff to drive company cars as part of their work activities exposes them to specific hazards and risks. Lack of vehicle maintenance or driver skills may increase the risk of injury and damage to vehicles.

Falcon will:

- Identify any driver training or instruction that may be necessary on the use of mobile phones, accident involvement, services, regular vehicle condition checks, breakdown, maximum working and driving hours and personal safety.
- Provide additional driver skills training or instruction, as appropriate.
- Check all driver licences periodically.
- Ensure that all staff are fully trained, insured and in a fit state of health to drive company or their own vehicles for work-related activities.
- Ensure that vehicles provided for staff are safe in a roadworthy condition.
- Ensure that vehicles are serviced and maintained at intervals recommended by the manufacturer.
- Ensure that vehicles provided are suitable for the individual who has to use them, e.g. sufficient adjustments, head and leg room, position of controls etc.

Specialist Vehicles Policy

We recognise the specific hazards and risks that are inherent in the use of specialist vehicles for work-related activities. These may include earth-moving equipment, forklift trucks, MEWPs, dumpers, diggers etc.

Falcon will:

- Ensure that all operators are fully trained, insured and in a fair state of health to operate specialist vehicles for work-related activities.
- Provide specialist training, including refresher training, where appropriate, to comply with any licensing or other requirements.
- Ensure that vehicles provided to employees are suitable for the purpose and the environment they are used in and are safe to use.
- Check all driver licences and certificates on a periodic basis.
- Ensure that vehicles are maintained in safe condition and that any examinations e.g., lifting equipment, MOTs etc. are carried out, as required.

Control of Hazardous Substances

Due to the nature of its operations, the Falcon Group uses certain hazardous substances in the course of its activities. Wherever reasonably practicable, the Group will eliminate the use of hazardous substances or substitute them with products that present the lowest reasonably practicable risk to health and the environment. Through its procurement process, the Group will seek to purchase products that are not hazardous to health wherever suitable alternatives are available. Where hazardous substances are required, their use will be minimised and exposure controlled so far as is reasonably practicable.

All hazardous substances will be subject to a suitable and sufficient assessment in accordance with *The Control of Substances Hazardous to Health (COSHH) Regulations 2002 (as amended)* before they are introduced into the

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----------------------------------	---------------	---	---------

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workplace. Appropriate control measures will be implemented to prevent or adequately control exposure to hazardous substances.

COSHH assessments will be reviewed at appropriate intervals, whenever there is reason to believe they are no longer valid, following any significant change to the substances used, work processes or equipment, or where there are changes to relevant legislation or guidance.

The Group will maintain an up-to-date inventory of all hazardous substances used across its workplaces and project sites, together with the relevant COSHH assessments and Safety Data Sheets (SDS).

The findings of COSHH assessments, including the required control measures and safe systems of work, will be communicated to all affected employees. Where identified as a necessary control measure, suitable personal protective equipment (PPE) will be provided free of charge. Employees are required to use the prescribed control measures and PPE in accordance with their training and company procedures. Failure to comply with these requirements may result in disciplinary action in accordance with the Group's disciplinary procedures.

Contractors

All contractors engaged by The Falcon Group are required to comply with the Group's Health and Safety Policy, associated procedures, and all applicable site rules and statutory health and safety requirements while undertaking work on the Group's behalf.

The following clause may be incorporated into contracts and purchase orders issued to contractors to ensure compliance with the Group's health and safety requirements.

"Please note this copy of the groups' policy statement for Health, Safety and Welfare and a list of safety rules and requirements for contractors on our sites/premises and clients' premises. Your acceptance of the requirements of this policy will be deemed to include acceptance of the requirements of the Group policy. Please contact Falcon for any information on any matter in connection with Health, Safety or Welfare"

Data Protection

The Data Protection Act 2018 and the **General Data Protection Regulation (GDPR)**, ensure that any person who has access to, or processes, another person's personal data. The Data Protection Act exists in order to secure and respect an employee's right to privacy with regard to personal information that is held about them. In giving new privacy rights to individuals, the Act puts responsibility on those who keep personal information. Anyone processing personal data must comply with the principles, as put below.

The Principles:

The principles of the Data Protection Act are that data will:

- ✓ Be obtained and processed fairly and lawfully,
- ✓ Be held only for specific and lawful purposes and must not be processed in a manner that is incompatible with those purposes,
- ✓ Be adequate, relevant and not excessive for the purposes for which it is processed,
- ✓ Be accurate and, where necessary, kept up to date,
- ✓ Be held for no longer than is necessary for the purpose for which it is processed,
- ✓ Be processed in accordance with the rights of employees under the Act.
- ✓ Be subject to appropriate security measures.
- ✓ Be subject to scrutiny by individuals who have the right to correct or erase inaccurate Information.

Scope:

The Data Protection Act and therefore this statement covers employees, applicants, former applicants, agency workers, casual workers and contract workers.

Definitions:

Personal Data – data which relates to a living individual who can be identified from the data e.g., CV, performance development reviews, starter forms. This can be manual or automatic records.

Processing Data – anything we do with data is, in effect, processing it, including organisation, adaptation, alteration or retrieval.

Sensitive Data – information relating to racial or ethnic origin, political opinions, religious or other beliefs, trade union membership, health, sex life and criminal convictions. Legitimate reasons for processing such data may be for example, the monitoring of ethnic backgrounds and

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treatment of minorities, for the purposes of demonstrating and promoting equal opportunities policies.

Failure to adhere to the principles of the Data Protection Act could result in disciplinary action.

Disciplinary Procedure

The Falcon Group expects all employees, contractors, and others working on its behalf to comply with applicable health and safety legislation, company policies, procedures, and site rules. Failure to meet these requirements may place individuals and others at risk and will be addressed promptly and fairly.

Any reported or observed breach of health and safety requirements will be investigated to establish the facts, identify the root causes, and determine any corrective or preventive actions required. The findings of investigations will be reviewed, appropriate control measures implemented, and lessons learned communicated where necessary to prevent recurrence.

Where an employee is identified as failing to comply with health and safety requirements, they will be informed of the concerns and given the opportunity to explain the circumstances and take corrective action. Where appropriate, additional instruction, training, supervision, or support will be provided. If the issue persists or the breach is of a serious nature, formal disciplinary action may be taken in accordance with the Group's Disciplinary Policy and Procedures.

Where the Group is dissatisfied with the health and safety performance of an employee or contractor, a formal investigation and, where appropriate, a disciplinary meeting will be arranged. Employees have the right to be accompanied at formal disciplinary meetings by a fellow employee or accredited trade union representative.

Following consideration of all relevant information, appropriate action may be taken, which may include additional training, a verbal warning, written warning, suspension from work, dismissal, or termination of a contractor's engagement, depending on the seriousness of the breach and in accordance with the Group's disciplinary and contractual procedures.

Records of all investigations, disciplinary action, and outcomes will be maintained in accordance with the Group's document retention procedures and may be used for appeals, legal proceedings, or regulatory investigations where required.

Serious Health and Safety Breaches

The following are examples of serious breaches that may result in an individual being suspended from work or removed from site immediately, pending the outcome of a formal investigation:

- Failure by managers or supervisors to communicate relevant risk assessments, safe systems of work, control measures, or site-specific health and safety requirements to those under their supervision.
- Deliberately working in a manner that disregards established health and safety procedures or control measures, creating a serious or life-threatening risk to themselves or others.
- Deliberate misuse of, interference with, or damage to equipment or facilities provided for health, safety, or welfare purposes, including:
 - Personal Protective Equipment (PPE);
 - First aid equipment and facilities;
 - Welfare facilities;
 - Safety signs, notices, barriers, or warning devices.
- Attending work while under the influence of alcohol, illegal drugs, or any substance that impairs the ability to work safely, or consuming alcohol or illegal drugs during working hours or on Company premises, except where expressly authorised.
- Willfully removing, bypassing, disabling, or interfering with safety devices, guards, or protective systems.
- Deliberately failing to comply with a reasonable health and safety instruction or refusing to use required control measures or PPE.
- Failing to report a serious accident, dangerous occurrence, near miss, or hazardous condition where there is a duty to do so.
- Any act of violence, threatening behaviour, horseplay, or reckless conduct that places the health, safety, or welfare of any person at risk.

Each case will be considered on its own merits, taking into account the circumstances, the seriousness of the breach, previous conduct, and the requirements of the Group's disciplinary procedures. Suspension is a neutral act and does not imply guilt or predetermine the outcome of any investigation.

Owner: Health and Safety Dept	Version: 5	Issue Date: July 2023 Reviewed: 31/07/2026	FPD 018
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Health and Safety Policy

Tower Cranes / Transport / Power Generation / Spray Painting / Shot
Blasting / Fabrication / Training and Contract Lifting

The Falcon Group Services Ltd
Shipdham Airfield Industrial Estate
Shipdham, Thetford, IP25 7SD

Display Screen Equipment

Although the use of Display Screen Equipment (DSE) is generally considered to be a low-risk activity, poorly designed workstations or prolonged periods of DSE use can contribute to musculoskeletal disorders, visual fatigue, headaches, stress, and other health-related issues.

The Falcon Group is committed to ensuring that all DSE workstations comply with the requirements of *the Health and Safety (Display Screen Equipment) Regulations 1992 (as amended)*. Suitable and sufficient DSE assessments will be undertaken to ensure that workstations, equipment, and the working environment are ergonomically appropriate and that any risks are reduced so far as is reasonably practicable.

Employees identified as DSE users are required to cooperate with the assessment process, make proper use of the equipment provided, adjust their workstation in accordance with the guidance given, and promptly report any defects, discomfort, or issues that may affect their health, safety, or wellbeing.

Employees who are classed as DSE users will receive appropriate information, instruction, and training to enable them to understand the potential health risks associated with DSE work and to set up and use their workstation safely and efficiently. They will also be encouraged to take regular changes of activity or breaks from prolonged screen work.

Employees who are designated as DSE users are entitled to request an eyesight test:

- Before commencing regular DSE work, where appropriate;
- At regular intervals thereafter, as recommended by the optometrist or where required by the Regulations; and
- Whenever they experience visual difficulties that may reasonably be associated with DSE use.

Where an eyesight test identifies that special corrective appliances are required specifically and solely for DSE work, the Group will contribute towards the cost of providing such appliances in accordance with its DSE and Eye Care Policy.

Documentation

The office will ensure that a complete copy of, or where appropriate, relevant extracts from Falcon Health and Safety Policy are made available to clients when requested for reference. A copy of the current Employer's Liability Insurance Certificate will also be made available on request and displayed when practicable on site/premises.

Each project will be provided with the following when necessary:

- A safety folder containing the necessary inspection records e.g., thorough examination certificate.
- Method statements, risk assessments and safety notices
- Up-to-date safety signs and standards.
- Records of safety talks, training and meetings.

Electrical Power Tools

Electrical equipment is to be tested at regular intervals as recommended by the *HSE guidance note HS (G) 141 and L144* and in line with company risk assessment. Staff will be properly trained only to use equipment after they have given it a visual inspection to identify damage or defects, and to use it only for the purposes for which it is intended according to the safe systems of working. Where equipment is found to be faulty, repairs and re-testing will be carried out before the equipment is re-issued.

Emergency Procedures

Falcon will establish and where necessary provide appropriate procedures to be followed in the event of serious and imminent danger to persons working for them. The prime objective will be to ensure that no employee, contractor or visitor enters any area where serious or imminent danger exists without first receiving adequate Health and Safety instruction.

Falcon will inform workers about the potential dangers, the controls and the emergency procedures. The workers will also be instructed on how to identify conditions in these potentially dangerous areas where it may be necessary to stop work and go to a place of safety. The emergency procedures will then provide adequate safeguards to prevent re-entry to the work area until the risk of danger has been cleared.

Owner: Health and Safety Dept	Version: 5	Issue Date: July 2023 Reviewed: 31/07/2026	FPD 018
----------------------------------	---------------	---	---------

UNCONTROLLED WHEN PRINTED

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Environmental Considerations

Falcon recognises its duty of care under *The Environmental Protection Act 1995, The Environmental Protection (Duty of Care) Regulations 1990, The Controlled Waste (Registration of Carriers and Seizure of Vehicles) Regulations 1992, Hazardous Waste (England & Wales) Regulations 2005, and other associated statutory provisions.*

"Controlled Waste" will only be released to a "Registered Carrier" after proof (Electronic licences are now accepted) has been produced by the "authorised person" all parts of the "Waste Transfer" note will be completed in full, with a copy remaining with Falcon for not less than 2 years.

"Hazardous Waste" will only be moved by a "Registered Carrier" after the completion of a "Hazardous Waste Transfer Note" and the pre-notification of the movement to the Environment Agency, a copy of which will be kept by Falcon for no less than 3 years.

All waste will be suitably packed to ensure the safety of others during storage and carriage and also to prevent the spillage, leakage, waste blowing or falling or the pilfering of contents by third parties.

Fire Safety

Operatives are expected to attempt to extinguish a fire only if they have received appropriate training and it is safe to do so. If the situation is dangerous or potentially dangerous, the employee should raise the fire alarm immediately and evacuate the building/area immediately. In this situation operatives are to meet at the pre-determined assembly point. A procedure for dealing with any fire will be prepared and effective steps taken to ensure that all employees are familiar with the procedure.

Health Surveillance

Falcon will ensure that employees are provided with such Health Surveillance as is appropriate having regard to the risks to their Health and Safety and others who could be affected by their acts, omissions or ill health which are identified by the risk assessment of their activities.

Health surveillance is normally carried out by an occupational health professional; however, in certain areas a trained nurse or supervisor may check exposure/effects.

You are required to carry out health surveillance in the following circumstances:

- A. Persons working under Schedule 6 of COSHH, when manufacturing compounds of benzene, is likely to receive significant exposure.
- B. When exposed at work to substances that are likely to have an effect on health.

These records must be kept for 40 years.

Insurance

In recognition of its statutory and common law duties, Falcon has taken out insurance with an authorised insurer. The certificate of insurance will be made available to employees for inspection at all reasonable times by employees and regulatory authorities i.e., the Health and Safety Executive Inspectors.

Manual Handling Operations

Standards required.

The following regulation applies to manual handling:

The Manual Handling Operations Regulations 1992.

Planning: All work will be tendered for or negotiated considering the above regulations. Supervisors will ensure that materials are handled as far as possible by mechanical lifting equipment. Where the use of the machine is available to handle any heavy or awkward loads, instructions must be issued to site on the handling of these loads. A manual handling assessment will be undertaken in all situations in which a risk remains after the implementation of controls in accordance with the Manual Handling Operations Regulations 1992.

Employees who undertake manual handling activities will be given training in the correct methods of handling and lifting loads as part of their normal safety training.

Owner: Health and Safety Dept	Version: 5	Issue Date: July 2023 Reviewed: 31/07/2026	FPD 018
----------------------------------	---------------	---	---------

UNCONTROLLED WHEN PRINTED

It is the responsibility of the user to ensure they are working with the latest revision

Supervision: Operatives will be instructed in the correct handling and lifting of loads when mechanical means are not practical, and staff will ensure that there is a supply of suitable gloves available for issue as required for the handling of materials which cause injury to hands. Safety footwear will be worn at all times on site and supervisory staff will caution any employee or sub-contractor wearing unsuitable footwear. The supervisor will not require any operative, particularly vulnerable employees, to lift without assistance, a load which is likely to cause injury.

Safe System of Work

The main injuries associated with manual handling and lifting are:

- Back strain, slipped disc.
- Hernias
- Musculoskeletal disorders
- Lacerations, crushing hands or fingers.
- Tenosynovitis
- Bruised or broken foot and toe injuries
- Various sprains, strains, etc.

The selection of persons to carry out manual handling or lifting tasks will be based on the training given, age, physical build, etc. Where loads must be manually handled, the need to ensure that access is safe is especially important. The training provided should be based on the physical structure of the body and the effect of attempting to handle loads in various positions.

Manual handling operations will be avoided as far as is reasonably practicable i.e., by delivering work equipment, as close to the area of intended works and by the use of lifting devices, but where a risk of injury still exists it will be reduced to the lowest level possible.

Where an avoidance of a manual handling task is not possible, an assessment of the operation will be made taking into account the task, the load, the working environment and the capability of the individual to perform the task in hand.

An assessment will be reviewed if there is any reason to suspect that it is no longer valid. In the first instance, all possible steps will be taken to reduce the risk of injury to the lowest level that is reasonably practicable throughout the workplace.

New and Expectant Mothers

The following arrangements apply where an employee is pregnant, has recently given birth or is breastfeeding:

- A new or expectant mother must notify their line manager regarding her condition. This should be in the form of a certificate from a registered medical practitioner or registered midwife.
- A new or expectant mother risk assessment must be completed by the Health and Safety Training Manager.
- If the risk assessment highlights that the mother could be at risk from working conditions, physical, chemical or biological agents that may adversely affect her condition, then the following action must be taken.
- In accordance with employment law, alter working conditions or hours of work, offer suitable alternative employment, or suspend on full pay, for as long as necessary to prevent exposure to the risk.
- Provide any additional information, instruction and training identified by the risk assessment
- Regularly monitor the employees' working arrangements.

Personal Protective Equipment

Personal Protective Equipment at Work (Amendment) Regulations 2022

PPE identified as necessary after an assessment of the various activities will be supplied free of charge by Falcon. Suitable PPE will be issued to employees, who will receive appropriate information, instruction and training in its correct use, maintenance and storage.

Falcon will operate an ongoing policy of monitoring equipment use. It will be a disciplinary matter if staff do not adhere to the use of PPE and the associated controls that are to be implemented as part of the risk assessment. It will be mandatory that workers wear safety helmets, high visibility jackets and safety boots or safety shoes always. Other PPE may be required according to the risk assessment and in accordance with the Depot / site rules.

Personal Protective Equipment – Visitors to Site/Depot

Official visitors to the site/Depot (e.g., surveyors, engineers, inspectors etc.) will be required to wear a safety helmet, high visibility jackets and safety boots. Other PPE such as goggles, and hearing protection should be

Owner: Health and Safety Dept	Version: 5	Issue Date: July 2023 Reviewed: 31/07/2026	FPD 018
----------------------------------	---------------	---	---------

UNCONTROLLED WHEN PRINTED

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Health and Safety Policy

Tower Cranes / Transport / Power Generation / Spray Painting / Shot
Blasting / Fabrication / Training and Contract Lifting

The Falcon Group Services Ltd
Shipdham Airfield Industrial Estate
Shipdham, Thetford, IP25 7SD

considered and used when required. Visiting managers, engineers or supervisors and contractors are expected to set a positive example by wearing the appropriate PPE at all times.

Procedure for New Employees engaged by Falcon.

The procedure is to be carried out by the supervisor where the new employee will be required to work.

- 1) Explain to the role to new employee what he/she will be required to do and to whom he/she will be directly responsible as part of the company induction process.
- 2) Issue the new employee with a copy of The Falcon Group Statement of Safety Policy and details of their responsibilities for safety matters. Also show the employee where the complete Policy for Health, Safety & Welfare is kept and explain its purpose.
- 3) Ascertain if the new employee has any disability or illness which could prevent them carrying out certain operations safely or require additional protective measures.
- 4) Show the new employee where copies of regulations are kept.
- 5) Warn new employees of any potentially dangerous areas of operations on jobs or in the workplace.
- 6) Warn the new employee of any prohibited actions e.g., entering specific areas without a safety helmet, operating plant unless authorised etc.
- 7) Ascertain whether any additional training or instruction is required, and as appropriate arrange, e.g., abrasive wheels, cartridge tools, scaffold inspections etc.
- 8) Issue all employees any protective clothing or equipment necessary, e.g., safety helmet, eye protection, ear defenders/plugs, wet weather, clothing etc., and obtain their signature for the items issued.
- 9) Where necessary, inform the new employee of servicing procedures etc.

Additional Procedure for New Employees Under 18 Years of Age

Inform them that they must not operate any plant, give signals to any crane driver and use any power tools or equipment unless being trained under the direct supervision of a competent person. Carry out and communicate a risk assessment to the young person, their supervisor and where appropriate, their parent or guardian. The risk assessment will be carried out by the Health, Safety & Training Manager or Depot Manager, when required.

Protection of Persons in Work Areas

All necessary measures required for the protection of others will be allowed for and planned, taking into account *section 3 of the Health and Safety at Work etc. Act 1974*. Consideration will be given at the planning stage to ensure the protection of others and when necessary, barriers, screens etc. will be provided to ensure their protection and to minimise the effects of dust etc.

Purchase Policy

The Falcon Group recognises its duties under applicable health and safety legislation to ensure, so far as is reasonably practicable, that all materials, substances, plant, machinery, equipment, and personal protective equipment (PPE) purchased for use within the business are suitable for their intended purpose and do not introduce unnecessary risks to health, safety, or the environment.

Prior to the purchase of any materials, substances, plant, machinery, or equipment, the Group will consider the potential health, safety, environmental, and operational implications associated with their transport, handling, storage, installation, use, maintenance, and disposal. Procurement decisions will be based not only on quality and cost but also on the suitability of the product throughout its lifecycle.

In particular, the Group will:

Purchase, wherever reasonably practicable, substances that are not hazardous to health or the environment. Where hazardous substances cannot be eliminated, preference will be given to products presenting the lowest reasonably practicable level of risk while maintaining the required quality, performance, and value.

Assess plant, machinery, and work equipment for suitability, ergonomic design, safety features, noise and vibration levels, ease of use, maintenance requirements, energy efficiency, and compliance with relevant UK legislation and recognised standards before purchase.

Ensure that all work equipment is supplied with appropriate guarding, operating instructions, maintenance information, and any necessary safety documentation.

Owner: Health and Safety Dept	Version: 5	Issue Date: July 2023 Reviewed: 31/07/2026	FPD 018
----------------------------------	---------------	---	---------

UNCONTROLLED WHEN PRINTED

It is the responsibility of the user to ensure they are working with the latest revision

Select Personal Protective Equipment (PPE) based on the level of protection required, suitability for the task, comfort, compatibility with other PPE, and compliance with applicable legislation and recognised standards. Cost alone will not determine the selection of PPE.

Purchase office furniture, display screen equipment, and other workplace equipment with consideration given to ergonomic design, fire performance, durability, sustainability, accessibility, and the health and wellbeing of employees.

Consider opportunities to reduce environmental impact by selecting products that are durable, energy efficient, recyclable where appropriate, and sourced from responsible suppliers.

The Group will ensure that procurement decisions support its commitment to providing safe systems of work, protecting the health and wellbeing of employees and others, and achieving continual improvement in health, safety, environmental, and quality performance.

Fraud and Malpractice Policy

Policy Statement

The organisation requires all staff at all times to act honestly and with integrity and to safeguard the resources for which they are responsible. Fraud is an ever-present threat to these resources and hence must be a concern to all employees. The purpose of this statement is to set out your responsibilities with regard to the prevention of fraud.

Definition of Fraud?

The use of deception with the intention of obtaining an advantage, avoiding an obligation or causing a loss to another party.

The organisation should be responsible for:

- Developing and maintaining effective controls to prevent fraud.
- Carrying out vigorous and prompt investigations if fraud occurs.
- Taking appropriate legal and/or disciplinary action against perpetrators of fraud.

Taking disciplinary action against supervisors where supervisory failures have contributed to the commission of fraud.

Managers should be responsible for:

- Identifying the risks to which systems and procedures are exposed.
- Developing and maintaining effective controls to prevent and detect fraud.
- Ensuring that controls are being complied with.

Individual members of staff are responsible for:

- Acting with propriety in the use of official resources and in the handling and use of corporate funds whether they are involved with cash or payments systems, receipts or dealing with contractors or suppliers.
- Reporting details immediately to (their line manager or next most senior manager) if they suspect that a fraud has been committed or see any suspicious acts or events.

Security Arrangements

The Falcon Group will ensure that suitable measures are implemented on all sites to prevent unauthorised access by trespassers, children, and other members of the public, thereby reducing the risk of injury or exposure to site hazards.

Where applicable, control measures will include the removal or securing of access equipment, such as ladders, at the end of each working day, the installation of scaffold alarms or other suitable security devices fixed to structures, and the provision of secure barriers, hoarding, and appropriate warning signage to prevent unauthorised entry.

Adequate site lighting will be provided where necessary to improve security and visibility during periods of reduced natural light.

All flammable liquids and hazardous substances will be stored in suitable, secure, locked, and appropriately banded storage facilities in accordance with relevant legislation and safe storage requirements.

Any structures undergoing demolition works will be left in a safe and stable condition at the end of each working shift. Suitable measures will be implemented to prevent collapse, unauthorised access, or exposure to residual hazards until work recommences.

Owner: Health and Safety Dept	Version: 5	Issue Date: July 2023 Reviewed: 31/07/2026	FPD 018
----------------------------------	---------------	---	----------------

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Health and Safety Policy

Tower Cranes / Transport / Power Generation / Spray Painting / Shot
Blasting / Fabrication / Training and Contract Lifting

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Sharps (Needles/Syringes) Site or Depots

Falcon is aware that operatives may be working in areas where sharps (needles/syringes) may be present. These represent biological hazards at work, and Falcon will control these risks and provide the staff with safe systems of work and the appropriate training and equipment.

Sharps can cause needlestick injuries, which are skin punctures caused by a needle. If the needle has been used by a person infected with a blood-borne disease, including hepatitis B and C and HIV, this disease could be transmitted to a worker subsequently injured by the same needle.

When operatives are working in areas where there have been sharps found or are likely to be found, Falcon will inform, instruct and train its operatives in safe procedures, handling methods and provide suitable equipment: Disposable tongs, stout rubber gloves and a sharps box or container.

Sharps will not be placed in plastic bags; litter bins, toilets or left about for others to pick up.

If sharps are found by operatives, they must inform their supervisor and management must report the find to the client or principal contractor. The removal of the sharps must be properly supervised and undertaken by a competent person with the correct PPE. Any injuries to personnel must be recorded in the accident book, and Falcon will follow up these incidents, because any resulting infection will be reportable under RIDDOR regulations, and all situations of needle stick will need to be investigated to prevent further occurrence.

Health and wellbeing policy

Mental ill health and stress are associated with many of the leading causes of disease and disability in our society. Promoting and protecting the mental wellbeing of the workforce is important for individuals' physical health, social wellbeing and productivity. Mental wellbeing in the workplace is relevant to all employees, and everyone can contribute to improved mental wellbeing at work.

Addressing workplace mental wellbeing can help strengthen the positive, protective factors of employment, reduce risk factors for mental ill health and improve general health. It can also help promote the employment of people who have experienced mental health problems and support them once they are at work.

Important aspects of mental health and wellbeing include providing information and raising awareness, management skills to deal with issues around mental health and stress, effectively providing a supportive work environment, offering assistance, advice and support to anyone experiencing a mental health problem or returning to work after a period of absence due to mental health problems.

The Falcon Group is committed to the protection and promotion of the mental health and wellbeing of all staff.

- Will shall continuously strive to improve the mental health environment and culture of the organisation by identifying, eliminating, or minimising all harmful processes, procedures and behaviours that may cause psychological harm or illness to its employees.
- hall continuously strive, as far as is reasonably practicable, to promote mental health throughout the organisation by establishing and maintaining processes that enhance mental health and wellbeing.

Policy Aim:

To provide a working environment that promotes and supports the mental health and wellbeing of all employees.

Scope:

This policy will comply with Health and Safety legislation and best practice guidelines.

This policy will be developed in accordance with existing organisational policies and procedures.

This policy will be owned at all levels of The Falcon Group, developed and implemented across all departments, evaluated and reviewed as appropriate.

Policy Objectives

To develop a supportive culture, address factors that may negatively affect mental wellbeing, and to develop management skills.

Company Mental Health First Aiders are:

- Laura Dagless
- Ashley Cheetham
- Mel Edward
- Mark Wardle

Suppliers

The following paragraph may be inserted on all orders to suppliers or hire companies providing any article or substance for use at work.

"In accordance with section 6 of the Health and Safety at Work etc. Act 1974 we would be pleased to receive your confirmation that the article or substance to be supplied is safe and without risk to health when

Owner: Health and Safety Dept	Version: 5	Issue Date: July 2023 Reviewed: 31/07/2026	FPD 018
----------------------------------	---------------	---	---------

UNCONTROLLED WHEN PRINTED

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Blasting / Fabrication / Training and Contract Lifting

The Falcon Group Services Ltd
Shipdham Airfield Industrial Estate
Shipdham, Thetford, IP25 7SD

properly used. Also, in accordance with the above, please supply details of any tests of examinations carried out and full instructions for the safe use of the article or substance e.g., safety data sheets. Reference should be made to the Provision and Use of Work Equipment Regulations 1998

All information received from suppliers will be passed to the supervisor for implementation and reference by operatives. Falcon will maintain assessment procedures in order to ascertain the training needs for the staff allocated to use new work equipment introduced.

Violence to Staff

Falcon will assess the risks and evaluate the work and the workplaces of the staff to identify possible “at risk” staff and to implement effective procedures and precautions to protect them from possible violence whilst at work. Staff will be trained in any specific procedures required and will familiarise themselves with all arrangements outlined by clients to reduce the possible risk of violence and follow them as appropriate to each situation where violence may occur.

Where there are known risks, a preventative strategy will be invoked before undertaking any work; these will differ in each case, and the supervisor and operatives will agree on how to handle the situation and use appropriate safeguards.

Where there is any suspicion that violence may occur, the operatives will contact a supervisor and seek assistance before undertaking any work or compromising their position. All violence or abuse towards staff, i.e., verbal or physical intimidation, threat or assault by a member of the public, in circumstances arising out of or in the course of, employment will be investigated by Falcon and as appropriate reported to the local police and local authorities.

Welfare Facilities, Site Accommodation

The principal contractor will supply contract site accommodation and temporary buildings when agreed prior to commencement on site. The units will be positioned so as to minimise fire risk. When permanent welfare facilities are not available for some or all of the entire contract, then by agreement of the interested parties suitable sanitary facilities and water supply are to be supplied by Falcon together with office and canteen facilities. Facilities will include the provision of fire extinguishers of an agreed type (i.e., AFFF, water, dry powder or carbon dioxide) when required; they will be positioned in an appropriate position and be kept free of obstruction and available for use at all times. At each site, there will be facilities readily available for summoning assistance from the emergency services (i.e., telephone or mobile phone). Welfare Facilities and site accommodation will be provided at Shipdham in accordance with the *Workplace (Health, Safety and Welfare) Regulations 1992*.

Young Persons

Where The Falcon Group employs or engages young persons under the age of 18, suitable and sufficient risk assessments will be completed before they commence work. These assessments will consider the specific risks associated with the young person's age, experience, knowledge, capabilities, and any additional factors that may affect their health and safety or the safety of others who may be affected by their activities.

The Group will ensure that appropriate control measures are implemented to provide a safe working environment and will provide young persons with suitable information, instruction, training, and supervision to enable them to carry out their duties safely.

Where required by applicable legislation, parents or legal guardians will be informed of the findings of the relevant risk assessments and the control measures implemented to protect the young person while at work.

The level of supervision provided will be proportionate to the risks involved and the individual's level of experience and competence, with additional support provided where necessary to ensure that young persons do not undertake work beyond their capabilities or that could place themselves or others at risk.

Owner: Health and Safety Dept	Version: 5	Issue Date: July 2023 Reviewed: 31/07/2026	FPD 018
----------------------------------	---------------	---	---------

UNCONTROLLED WHEN PRINTED

It is the responsibility of the user to ensure they are working with the latest revision