



WYG Group Health and Safety Policy Document

31 October 2019

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Douglas McCormick
President WYG

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Foreword

This WYG Group Health and Safety Policy Document identifies the arrangements against which all WYG Group companies will deliver. Whilst establishing a framework which creates an empowered work force, it also introduces Health and Safety to clients and other external organisations or individuals. The document identifies the controls that are in place, which whilst ensuring the integrity of the implemented processes is maintained, also focuses on customer satisfaction and continuous improvement.

In satisfying these requirements, all operational WYG Group companies will secure and maintain registration, through a common recognised UKAS Accredited Assessment Body, to the international recognised standard OHSAS 18001 (to transition to ISO 45001)

Table 1: Definitions

Terminology	Definition
WYG Group	Refers to WYG Group and each of its Group of operating companies, namely: WYG Engineering Ltd WYG Engineering (Northern Ireland) Ltd WYG Environment, Planning Transport Ltd WYG Environmental and Planning (Northern Ireland) Ltd WYG Management Services Ltd WYG Management Services (Northern Ireland) Ltd WYG International Ltd
Divisions	International Development Planning & Environment Design & Engineering Management & Surveying Group Business Services (GBS)
Regions	Global territories within the Group i.e. Europe, Africa and Asia (EAA) Middle East and North Africa (MENA) United Kingdom (UK)
Health and Safety Management System	Documentation which includes the setting out of standards for Health and Safety management throughout the WYG Group along with supporting guidance on how to achieve these standards.
WYG Ltd	Refers to WYG Ltd and its Group of operating companies.
WYG President	Nominated WYG Ltd Director with specific responsibility for the successful implementation and upkeep of the WYG Group Health and Safety Policy reports to WYG Ltd.
WYG Group Health and Safety Nominated Persons	Nominated competent persons to provide Health and Safety assistance to WYG President and WYG Ltd Directors.



Group Health and Safety Policy Statement

We are committed through the way we work and behave to achieving and maintaining high standards of health, safety and welfare of our employees and any others who may be affected by our work activities. It is our intent to demonstrate an on-going and determined commitment to improving health, safety and welfare at work through operating to an agreed framework as to achieve the following:

- A healthy and safe environment for employees and others affected by our activities.
- The prevention of accidents and ill health at work (including out-of-office, project and site-based activities).
- Compliance with and correct application of relevant health, safety and welfare legislation and industry best practice.
- Identification of our workplace health and safety hazards.
 - We expect our sub-contractors and stakeholders to identify health and safety hazards that may impact on our work activities.
 - Our employees are empowered to take action to minimise health and safety risks through our WYG STAR principle.
- Health and safety instruction and training to ensure competency of our employees and others, as necessary.
- Engagement with our employees and any other interested parties through active open communication and consultation on all matters affecting their health and safety.
- The setting of health and safety objectives and targets annually for all parts of the Group.
- Allocation of sufficient resources, including finance and time, to ensure all employees, subcontractors and stakeholders are aware of WYG Health and Safety controls and committed to its effective implementation.
- Active and open regular monitoring, auditing and review of our compliance with the policy.
- A formal annual review and agreement of this policy and future health and safety objectives and targets.
- Continual improvement of our health and safety performance through development and implementation of an effective health and safety management system which actively contributes to the continued success of our business.

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Douglas McCormick
WYG President



1. Health and Safety Organisation Structure

All employees are responsible for implementing the Health and Safety Management System requirements with the support of the WYG Group Health and Safety Team. All employees within the organisation have specific responsibilities under the Health and Safety at Work Act etc. 1974. It shall be the duty of every employee while at work -

- (a) to take reasonable care for the Health and Safety of himself and of other persons who may be affected by his acts or omissions at work; and
- (b) as regards any duty or requirement imposed on his employer or any other person by or under any of the relevant statutory provisions, to co-operate with him so far as is necessary to enable that duty or requirement to be performed or complied with

These responsibilities are detailed below.

1.1 WYG President

The President has the ultimate responsibility and accountability for Health, Safety and Welfare within WYG Group and is responsible to the Senior Management Team (SMT) of WYG Ltd for the successful implementation and upkeep of the Group Health and Safety Policy and associated policies. The WYG President is also responsible for the implementation of the organisational structure and arrangements to ensure that Health and Safety is effectively managed in line with statutory requirements, WYG Ltd standards, and objectives and to address specific issues that are related to its own operations. The WYG President will:

- Appoint in writing WYG SMT with specific responsibility for the development and implementation of the Health and Safety Policy and associated policies, organisational structure and arrangements to satisfy the requirements of the WYG Group Health and Safety policies
- Agree annual Health and Safety objectives, targets and action plans with the WYG Group Health and Safety Team
- Provide adequate resources, including finance and time, for implementing Health and Safety policies and action plans
- Appoint, in writing, sufficient numbers of competent persons to assist in the implementation of the policies
- Provide active support to Group Health and Safety team
- Regularly monitor and review Health and Safety performance and progress against the Group Health and Safety action plans with the WYG Group Divisions / Regions and Group Health and Safety team and authorise the necessary actions for completing the Health and Safety action plans
- Provide leadership and set a personal example through active, visible engagement and undertaking of site health and safety visits

1.2 WYG Ltd

WYG Ltd recognises its corporate Health and Safety responsibilities and will:

- Ensure that adequate consideration is given to Health and Safety implications when making business decisions
- Allocate sufficient resources including finance to enable the Health and Safety policy, and associated policies to be implemented in full
- Set a personal example and provide leadership

1.3 Group Managing and Divisional Directors / Regions



The Divisional Directors / Region has responsibility for implementing the Health and Safety Policy and associated policies and arrangements including the out-of-office project activities and will:

- Ensure the Division/ Region has adequate Health and Safety organisation and arrangements in place for its out-of-office activities to ensure compliance with the Group Health and Safety policy and associated policies and arrangements
- Agree the annual Health and Safety objectives, targets and action plans with the Group Health, and Safety Team
- Ensure adequate resources, including finance and time, is available for implementing the Health and Safety policy, associated policies and action plans
- Provide active support to the Group Health and Safety team
- Ensure identification, assessment and control of Health and Safety risks
- Ensure adequate Health and Safety training and instruction and, where appropriate, for employee consultation on decisions relating to Health and Safety at work
- Regularly monitor and review progress with their Management Team and the Group Health and Safety Team and authorise the necessary actions for completing the Health and Safety action plans.
- Provide leadership and set a personal example, through active, visible engagement with project teams including undertaking of site visits

1.4 Nominated Health and Safety Competent Persons

The nominated Health and Safety competent persons are appointed advisors to the WYG President as required by Regulation 7 of The Management of Health and Safety at Work Regulations 1999 and Regulation 7 of The Management of Health & Safety Regulations 2000 (NI) and will:

- Advise the WYG President of WYG Group and others in Health and Safety matters that affect WYG activities
- Attend and interact with the SMT at the SMT on all Health, Safety and welfare matters at a frequency of no less than twice per annum
- Further develop and advise on and assist in the implementation of the Health and Safety Policy and associated policies, organisational structure and arrangements to ensure that Health and Safety is effectively managed in-line with WYG Ltd standards and objectives and to address specific issues that are related to its own operations
- Keep up to date with legislation and other requirements and advise WYG personnel on the requirements in order to ensure full compliance
- Provide advice and support to management and staff members to help them to meet their Health and Safety responsibilities
- Manage the implementation and maintenance of the WYG Group Health and Safety Management System
- Assist in the identification of Health and Safety risk control measures with Divisional Directors / Region
- Recommend annual Health and Safety objectives, targets and action plans
- Monitor Health and Safety performance across the WYG Group
- Inform the WYG President and others regularly of the performance of the Health and Safety Management System
- Develop and maintain an effective internal Health and Safety audit system
- Develop and maintain Health and Safety communications on new developments, Health and Safety performance and incident reports
- Develop an effective system for reporting, investigation and corrective action for all incidents and work-related ill health cases and monitor its implementation
- Liaise with the regulatory authorities and other external interested parties
- Monitor and review WYG Group Health and Safety performance with other organisations
- Act to promote a positive Health and Safety culture and be a positive role model

1.5 Project Director(s)/Manager(s)



The Project Manager / Director has the overall responsibility for ensuring that appropriate arrangements are in place for the management of the Safety, Health and Welfare of project team members. They will ensure actions of the project team do not adversely affect the Safety and Health of any other party associated with the project.

The Project Director may appoint appropriate resources to assist in ensuring that this responsibility is discharged and will ensure:

- Project team members are aware of and follow the Health and Safety procedures and instructions
- Members of the project team have been briefed on their Health and Safety responsibilities
- Suitable and sufficient risk assessments for project activities have been carried out prior to commencing the project work, kept up-to-date and any control measures resulting from the assessments are implemented
- All work, including visits to sites, is adequately planned and controlled and appropriate information and instruction is provided to project staff prior to commencing work
- The project specific Health and Safety training needs of project staff (including contract and temporary staff) are identified and appropriate training provided
- Undertake active Health and Safety compliance monitoring of project teams through the undertaking of site visits
- All project related incidents are reported to the Group Health and Safety team and investigated per the WYG incident reporting and investigation procedure and resulting actions to prevent recurrence are carried out
- Where WYG employs contractors, their Health and Safety performance is assessed prior to selection and monitored during the project and reviewed post-project
- That adequate allowance in our tendered fee is included for preparation of method statements indicating how safe working and environmental protections will be achieved, safety equipment and PPE

1.6 Line Manager(s)

All those with responsibility for the management of others are expected to actively support the implementation of the WYG Health and Safety policy and associated policies. They are expected to demonstrate their commitment to Health and Safety by setting a good example themselves and through their effective management of Health and Safety issues within their own areas of control. Line Managers will ensure:

- They keep up to date with WYG Health and Safety policy, associated policies and procedures including relevant industry best practice, legislation and guidance in relation to their area of activity
- Staff under their control are aware of and understand Health and Safety procedures and instructions
- Risk assessments are completed for staff under their control including:
 - Display Screen Equipment (Cardinus)
 - Drivers Assessment
 - Home Workers
 - Young Workers
 - New and Expectant Mothers
 - Lone Workers
- The Health and Safety training and development needs of staff members (including contract and temporary staff) are identified and appropriate training provided
- The Health and Safety performance of all staff members is monitored, and action taken, including disciplinary action, when standards fall below an acceptable level
- Staff members are consulted on any changes which may affect their Health and Safety and they know how and who to report any Health and Safety concerns



- All incidents are reported to the Group Health and Safety team and investigated according to the WYG incident reporting and investigation procedure and resulting actions to prevent recurrence are carried out
- They liaise with Health and Safety team on matters within their area of responsibility

1.7 Employees (including staff, contracted or agency sub-consultants and sub-contractors)

All employees are responsible for implementing the Health and Safety Management System requirements with the support of the WYG Group Health and Safety Team. All employees within the organisation have specific responsibilities under the Health and Safety at Work Act etc. 1974. It shall be the duty of every employee while at work -

- (a) to take reasonable care for the Health and Safety of himself and of other persons who may be affected by his acts or omissions at work; and
- (b) as regards any duty or requirement imposed on his employer or any other person by or under any of the relevant statutory provisions, to co-operate with him so far as is necessary to enable that duty or requirement to be performed or complied with

Employees do this by but not limited to the following:

- Familiarise themselves with the Health and Safety policy, associated policies, organisational structure and arrangements to comply with the requirements therein as appropriate
- Familiarise themselves with the findings of project risk assessments and the agreed risk control measures for the project prior to commencing work
- Comply fully with all relevant Health and Safety procedures and instructions
- Co-operate with Line Manager/Project Managers/Directors as required to enable WYG to comply with statutory duties and other Health and Safety requirements
- Use correctly any work equipment provided in accordance with the instruction and training received
- Not misuse or interfere with anything provided in the interest of Health and Safety
- Take reasonable care of any personal protective equipment (PPE) provided and report any faults to management immediately
- Report any incidents or breaches in Health and Safety promptly to Line Manager &/or Project Director/Manager and engage with management and the Health and Safety team on any matters affecting their own Health and Safety or that of others who may be affected

1.8 Offices

The nominated responsible person in charge of an office (Office Principal) has overall responsibility for ensuring premises and office equipment is maintained. Duties include:

- Risk assessment of office-based activities including occupational health risks
- Day 1 local induction
- First aid provisions
- Fire safety arrangements
- Housekeeping inspections
- Equipment formal visual inspection
- Visitor sign in/out arrangements
- Safe waste and recycling provisions
- Energy conservation arrangements
- Health and Safety notice board
- Reporting accidents to the Group Health and Safety team
- Active and open consultation with staff members on office Health and Safety issues



- Taking part in audits and implementing corrective and preventive actions

The Office Principal will appoint in writing First Aider(s) and Fire Warden(s) in the correct ratio to manage the individual risks within our offices.

Where reasonably possible and practicable, WYG will ensure that the framework in place for Health and Safety within its UK offices is also implemented and maintained to raise standards in our overseas offices and ensure an adequate framework to support this is in place under the guidance of the Group Health and Safety Team.

2 Health and Safety Competence, Training and Awareness

We have established training procedures to ensure that all employees receive training on the importance of complying with the requirements of our Health and Safety policy, associated policies and processes and the potential consequences of departing from these requirements.

A learning and development plan is developed annually that aligns to corporate objectives and individual needs taking into consideration recent and upcoming changes in relevant legislation that affect our business activities.

Every new member of staff undertakes a corporate induction programme covering all essential Health and Safety areas that a new employee requires to operate in a safe manner. This programme consists mainly of e-learning modules and a structured Health and Safety training schedule bespoke to the individual's needs and role within WYG and their needs are assessed in relation to statutory training requirements and relevant legislation. Staff members who regularly attend construction sites will undergo Construction Card Scheme training or similar if applicable.

WYG uses a behavioral competency framework that applies to all levels of roles within the organisation. This framework consists of seven competencies, namely including thinking strategically, focusing on our clients, communicating effectively, continuously improving, leading and developing people, collaborating, and delivering results. At annual performance reviews, every member of staff is reviewed against the behavioral competencies to the level relevant to their role and role specific training is identified and managed by line managers to ensure that the staff member is able to discharge their duties.

3 Emergency Preparedness and Response

3.1 Emergency Evacuation

Fire Wardens are in place at all WYG premises (excluding temporary on-site accommodation such as site offices) to assist in the evacuation of staff and visitors. Fire drills are organised at least annually by Office Principals. WYG evacuation procedures are posted on each of the offices Health and Safety notice boards along with a list of all competent Fire Wardens. All WYG premises (excluding temporary on-site accommodation such as site offices) are required to ensure that they have sufficient competent Fire Wardens in place to provide for effective evacuation.

As part of our site operations we collaborate with all parties affected by our activities and ensure site rules are in place with regards to emergency evacuation. Where WYG is the Principal Contractor or Site Supervisor we employ specific procedures to ensure that the WYG Group requirements are met for emergency preparedness and response.

Evacuation plans are a fundamental part of planning for our overseas operations and are formulated on a bespoke basis across our operations. These are enacted when the business receives information from various sources that the safety of our employees is at risk. This can be anything from moving to a safe place in country to a full evacuation.



3.2 Fire Protection

All WYG premises (excluding temporary on-site accommodation such as site offices) are fitted with suitable and sufficient fire protection. All fire protection equipment including fire detectors, fire alarms, emergency lighting and fire extinguishers, are serviced at least annually by a competent contractor and maintained regularly, this process is managed centrally by the WYG Group Property team.

As part of our site operations we collaborate with all parties affected by our activities and ensure site rules are in place with regards to fire protection. Where WYG is the Principal Contractor or Site Supervisor we employ specific procedures to ensure that the WYG Group requirements are met for fire arrangements.

3.3 First Aid and Injury

Trained occupational First Aiders are available at all WYG premises to respond to first aid incidents during normal office hours. Names and contact details of First Aiders are posted on the Health and Safety notice board in each office. All WYG premises are required to ensure that they have sufficient trained first aiders in place to provide for effective response to injuries/illnesses.

As part of our site operations we collaborate with all parties affected by our activities and ensure site rules are in place with regards to first aid arrangements. Where WYG is the Principal Contractor or Site Supervisor we employ specific procedures to ensure that the WYG Group requirements are met for first aid.

4 Hazard Identification, Risk Assessment and Control

As defined in the Management of Health and Safety at Work Regulations 1999 we have a legal duty to assess the risks to workers and any others who may be affected by our work or business. This enables the Group to identify the measures needed to be taken to comply with health and safety law. The undertaking of suitable and sufficient risk assessments provides information that is needed to make decisions on how to manage those risks so that the decisions are made in an informed, rational and structured manner, and the action taken is proportionate.

Typical examples include Health, Safety and Environmental risk assessments, security risk assessments, travel risk assessments, display screen equipment risk assessments, young person's risk assessments, new and expectant mothers risk assessments, design risk assessments etc.

4.1 Office Activities

A comprehensive review and assessment of hazards, risks and controls within WYG premises has been undertaken. Risk assessments are held within the individual offices by the designated office Health and Safety coordinators, are signed off by the Nominated Office Principal and are reviewed at least annually, when there has been a change of activity, personnel, equipment or following an accident or significant near miss.

In addition to this through WYG's Human Resources team with support from the Group Health and Safety team, occupational health risks are assessed, and appropriate action taken to mitigate occupational health risks to an acceptable level and reduce the potential for ill health. A third-party specialist health care provider is utilised for pre-employment screening, health surveillance and return to work assessments. In addition to this third-party ergonomic specialist are employed for health-related ergonomic issues.

4.2 Out of Office Activities

A comprehensive review of Health and Safety hazards, risk and controls for WYG staff members undertaking out of office activities is completed which are bespoke to the requirements of the out of office activity. A Health and Safety risk assessment is completed for each project and is recorded in project folders; each risk assessment is checked and approved by Project Directors who understand the risks involved in each



project. Risk assessments are amended when activities change, the scope of the project changes or following an accident/incident.

4.3 Security

Dedicated competent Security resource is in place across the Group, their responsibility being Security processes and practices across WYG's global operations. Each office has a business continuity plan which is regularly tested, in addition to this office premises and staff security (both in the office environment and on-site) is assessed and actions taken to prevent, mitigate or control security risks so far as reasonably practicable. WYG has entered into strategic partnerships that provides integrated medical, clinical, and security services to our global international operations. Services include planning and preventive programs, in-country expertise, and emergency response. In addition, where considered appropriate, we are able to use a traveler tracking system to enhance visibility of our travellers so that in the event of emergency situations or a change in security/safety then actions can be taken promptly to minimise the risks.

5 Operational Control

Operational Control Procedures have been developed from a systematic examination of our activities, which identify hazards and specify work methods designed both to eliminate the hazards and minimise the relevant risks. All Operational Control Procedures are available to staff members via a dedicated portal on our Intranet. New or altered procedures will be issued in line with the Document Control Procedure and all procedures will be reviewed regularly and are subject to frequent audit, both internal and external.

As part of WYG operational control processes a specific procedure has been developed in line with Group Procurement and implemented to support the selection, control and monitoring of sub-contractors and sub-consultants.

WYG has a duty of care by virtue of Section 9 of the Health and Safety at Work Act etc.1974, no charge can be made to the worker for the provision of Personal Protective Equipment which is used only at work. WYG provides free of charge Personal Protective Equipment to all employees wherever there is a risk to Health and Safety that cannot be adequately controlled by other means. Robust procedures for assessing and issuing suitable and sufficient Personal Protective Equipment are in place, in addition training, instruction and supervision is provided to employees on correct use, maintenance and storage of their Personal Protective Equipment. Employees are responsible for using, maintaining and storing their Personal Protective Equipment as defined with WYG guidance and for reporting any defects or damage to so that replacements can be made.

6 Incident Recording and Investigation

WYG's accident, incident reporting and investigation procedures apply across all parts of the business. In addition to injury accidents, all staff members are actively encouraged to report any Health or Safety issues and near misses without delay. WYG has made a dedicated global provision through a strategic partnership providing an incident hotline reporting strategy to aid prompt reporting. The injured person's Line Manager is responsible for leading the accident investigation assisted by the Group Health and Safety team as necessary. Any serious accidents are also subject to Senior Management investigation and follow-up. All major accidents, as defined by the Group accident procedure, are reported without delay to the WYG President, Divisional Directors/Region and Group Health and Safety Team. The SMT review all accidents/incidents/near miss reports and resultant actions and the completion of the actions, the information is supplied within the Group Monthly Health and Safety report.

The Group Health and Safety team are responsible for the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR) to any enforcing authority.



The level of investigation needed to reach reliable conclusions will depend on the nature, complexity, actual severity and potential severity of the accident.

Each investigation will determine the events leading up to the accident; formulate conclusions as to the likely causes of the accident; and recommend action to prevent a recurrence of the same or similar accidents.

As part of the WYG Group induction process all staff are trained in the WYG accident reporting and investigation procedures and the key documents that may provide evidence of events and working practice. Consideration is given to the adequacy of the documentation, whether their terms were observed, how any instructions etc., were passed on and whether they were understood. Documents and records that are collected and reviewed include:

- Risk assessments and Permits to Work
- Other relevant Standards, Guidance, Procedures, Work Instructions
- Employee Health and Safety training records
- Records of repair, maintenance, inspections and testing
- Housekeeping and general inspection records

Having received the accident investigation report and the recommendations, management in charge of the accident area or activity decide how each of the recommendations is going to be implemented as part of the corrective action plan to prevent recurrence. The plan identifies the specific corrective actions required, who is responsible for carrying them out and the planned completion date. These are then agreed and signed off by the Group Health and Safety team to ensure they are suitable and sufficient.

7 Legal and Other Requirements

All Health and Safety legislation has been identified and recorded within our registers of legislation available on the Group Intranet portal. The legal registers identify the requirements of legislation and how WYG demonstrates compliance with this legislation. The Group Health and Safety team ensures that we remain up to date by obtaining and reviewing, on a regular basis, Technical Indexes, relevant publications, bulletins, the web and consulting with relevant staff members dealing with policy and legislation. Evaluation of compliance with legal requirements is undertaken during the WYG internal audit program. Corrective and preventive action is instigated following any identified non-conformance with legal requirements.

8 Objectives and Targets

8.1 Corporate

WYG is committed to continually improving our Health and Safety performance. This will be achieved, in part, by setting annual objectives and targets. In setting the annual objectives and targets we consider:

- Policy Commitments
- Legal Requirements
- Views of Interested parties (external and internal)
- Policy Commitments
- Legal Requirements
- Performance trends

The objectives and targets are reported monthly to Senior Management via the monthly Health and Safety report.

8.2 Operational

Project plans are project specific and are the interface between an individual project and the Health and Safety Management System. The project plan contains contractual documentation including client



requirements, resource details, timescales and client communications. Where projects are based around site activities, we complete a site Health and Safety risk assessment which are incorporated into the project plan. Our project plans serve not only as a management tool, but also fulfil legal and other requirements.

9 Document and Record Control

We have established a formal procedure for controlling all documents required for the implementation and maintenance of the Health and Safety management system.

10 Communication, Participation and Consultation

10.1 Corporate

Regular communications are circulated from the Group Health and Safety team to staff members. This can be in the form of safety alerts, monthly reports for Management meetings, communications via the corporate communications team, awareness posters, emails, new and updated procedures and findings from internal and external audits. Health and Safety is a mandatory agenda item for all meetings that take place whether at office, project or SMT level, with output communicated to staff members.

WYG has established a procedure for dealing with internal communications; the Group Health and Safety team will issue bulletins via e-mail on Health and Safety issues. This is used as a way of getting key information to staff members quickly and can be used for important issues or developments in relation to Health and Safety. In addition to this the Health and Safety monthly communications report is available to all staff via the WYG Intranet.

In addition to this on a regular basis the Office Health and Safety Co-coordinators are invited to attend a committee meeting which allows not only for updates and refreshers on specific topics relating to office Health and Safety but acts as another avenue for colleague feedback and any issues relating to Health & Safety to be discussed as a team.

All relevant staff members are consulted on any Health and Safety changes to WYG premises or their activities and staff members have the option to liaise directly with Line Managers or the Group Health and Safety team on any matter.

10.2 Operational

The WYG project planning process illustrates how co-operation and co-ordination of work is managed and achieved. By consultation the WYG team will develop a project plan which will consider the strategy for the delivery of the project and address more detailed issues such as roles and responsibilities, authority levels, reporting and communication structures. The plan is a living document that becomes the backbone of the project providing a point of reference for all to work within. The output from project planning can include documented project plans, identification of project hazards associated with Health and Safety issues, programmes, resource schedules and processes/procedures.

WYG engages with all stakeholders (Client, Project Team, Supply Chain and other interested parties that maybe affected by our operations) we encourage a collaborative approach to working and an open and active consultation process, to ensure stakeholders Health and Safety capability and competence fulfil our expectations, Health and Safety performance is monitored and reviewed so that work activities have minimal Health and Safety impacts.



11 Internal Audit

WYG understands the value of auditing and we have developed an audit schedule based on risk. Audits are not seen as criticising individuals or certain areas of the business. Rather the focus of our audits is on compliance with our processes (forms, policies, procedures, training, deployment of resources, and organisational purpose/mission) and the efficiency of the processes themselves.

Our auditing involves determining what part of the process to examine and therefore defining the scope of the audit, collecting and analysing data, recording findings and progressing towards recommendations.

External audits are based on our accreditation bodies' risk-based approach to certification. This risk-based approach is achieved using 'Key Risk Focus Areas'. As part of the certification bodies' routine audit approach they will ensure the required Focus Areas are probed – providing added value for WYG as the client. The Focus Areas are identified and prioritised using our Divisions Risk Heat Maps.

As well as compliance auditing, WYG also promotes peer review exercises where inter-departmental teams review each other's work on client projects to provide feedback and recommendations.

12 Non-conformance, Corrective and Preventive Action

Following any identified non-conformance with the requirements of the Health and Safety Management System a corrective and preventive action plan will be developed and implemented. Circumstances, which may give rise to a non-conformance include:

- Failure to observe the requirements of the Health and Safety Management System
- Health and Safety audits (internal and external)
- Failure or risk of failure to comply with legislation
- Complaints from sources external to the Group
- Accidents or Incidents

13 Management Review

Management reviews are carried out at least annually. Performance against objectives and targets as well as any problems associated with the Health and Safety Management System will be discussed. The following issues are addressed during the review:

- Results of internal audits
- The status of corrective and preventative actions
- Evaluations of compliance with legal and other requirements
- Communication from other parties, including complaints
- The extent to which the objectives and targets have been met
- Follow-up actions from previous management reviews
- Changing circumstances, including developments in legal and other requirements related to Health and Safety risks
- Recommendations for improvement
- System suitability and effectiveness

The Group Health and Safety team will provide suitable information to allow an effective review to be undertaken. The review will address the possible need for changes to the policy, objectives and targets, and any other element of the system in the light of the audit findings, changes in circumstances and the commitment to continual improvement.