



# The Health & Safety Performance of Sub-Contractors

HS(D)-POL-019

This policy applies to all Sub-Contracts which necessitate the attendance of the Sub-Contractor’s employees at any site, building or facility owned or managed by Babcock or a Ministry of Defence (MoD) site, building or facility serviced or maintained by Babcock in order to carry out work.

Prior to commencement of the Sub-Contract, a copy of this policy will be included in, and be a condition of, all such Sub-Contract agreements.

In the context of this policy the term Sub-Contractor means:

“A Project Sub-Contractor specifically contracted by Babcock to provide a service in support of Project Prime Contracts”

or

“A support Service Contractor contracted by Babcock to provide a service (such as Waste Removal)”

or

“Any Contractor who has received a contract from Babcock for works or services on any project instigated by Babcock”.

The Sub-Contractor is required to indicate and shall be deemed to have included, copies of this policy in any sub-contract that they may issue and to make compliance with this policy a condition of any such sub-contract.

The contents of this policy are in addition to the Sub-Contractor’s own Health and Safety arrangements.

Any reference in this policy to the Dockyard site or Naval Base estate shall include any site, building or facility owned, managed, serviced or maintained by Babcock whether within Devonport Royal Dockyard or at remote locations elsewhere and shall include services provided by Babcock to HM Naval Base Devonport (HMNB(D)), outstations and associated estates.

## 1. Introduction

The Health and Safety Policy of Babcock is to secure a high standard of safety performance in all its undertakings and Babcock requires Sub-Contractors to conduct their operations in the same spirit.

This Policy has been implemented as a driver to ensure that Sub-Contractors adopt safe working methods and comply with various statutory requirements. However, it should not be assumed that this policy embraces every contingency or hazard and observance of the Policy does not relieve Sub-Contractors of their legal obligations or any obligation under the Conditions of Contract or Sub-Contract.

In addition, it is a mandatory requirement to complete a Health, Safety and Environmental Questionnaire HS(D)-SD-014 which will form part of the tendering and selection process. If the tenderer does not submit a fully completed questionnaire their tender may be ruled technically non-compliant and they may not be considered further for contract award.

With Term Contractors the contract representative will request the contractor to review the questionnaire at a maximum interval of 3 years.

Whilst every effort has been made to attain comprehensive accuracy, Babcock disclaims responsibility for errors and omissions in this Policy.

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Sub-Contractors should note that compliance with this Policy is a condition of their contract with Babcock. Failure to comply with the Policy could result in the removal of Sub-Contractor personnel from site, termination of the contract and associated financial penalties being placed on the Sub-Contractor.

Throughout this policy, reference is made to the “Babcock Technical Representative” (TR). This term is used to describe the Babcock manager with specific responsibility for overseeing the technical execution of the sub-contract. The Sub-Contractor must ensure that they are made aware of the identity and contact details of the Technical Representative as soon as a contract is awarded.

This process supports compliance with Site Licence Conditions.

## 2. Legal Requirements

In practice it is rarely possible to distinguish between the work of Babcock and the work of its Sub-Contractors so clearly that each can meet its legal obligations for health and safety in isolation. Health and safety law places clear requirements for co-operation and co-ordination between employers in such circumstances. These responsibilities can be summarised as follows:

Babcock is required to:

- Exercise due diligence in selecting Sub-Contractors who have the necessary competence and resources to meet their legal obligations for health and safety during execution of the work.
- Take reasonable measures to ensure that any place of work provided for use by the Sub-Contractor is safe and without risk to health.
- Advise the Sub-Contractor of any risks created by its own activities, work equipment or facilities that could impact on the work of the Sub-Contractor.
- Seek information about any risks that the Sub-Contractor may create, and ensure that the necessary precautions are taken for the health and safety of its own employees.
- Advise the Sub-Contractor about any emergency arrangements that are in place that the Sub-Contractor may need to comply with or take part in.

The Sub-Contractor is required to:

- Deploy personnel with the necessary competence and resources to undertake the work in compliance with their legal obligations for health and safety.
- Make a suitable and sufficient assessment of the risks from their work, taking into account relevant information supplied by Babcock and provide for the necessary controls to reduce these risks to an acceptable level.
- Advise Babcock of risks that their activities may pose to others and any controls that have been applied to reduce these risks.
- Comply with and/or take part in Babcock emergency arrangements in accordance with the information and instructions provided.
- Advise Babcock where the emergency arrangements identified for their own activities require input from Babcock.

## 3. Risk Assessments & Method Statements

For all but the most basic work activities the Sub-Contractor will need to complete a risk assessment and method statement in order to satisfy its own legal obligations.

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These documents are also a starting point for the co-operation and co-ordination between the Sub-Contractor and Babcock.

To ensure clarity, method statements and risk assessments prepared by the Sub-Contractor must:

- Be typed, dated and bear the company mark of the Sub-Contractor.
- Carry a unique reference number.
- Be signed by an authorised member of the Sub-Contractor's organisation.

The risk assessment will typically:

- Identify the significant risks from the work activity to those directly involved in it, and to others who may be in the vicinity or working on the same system etc.
- Describe the control measures required to reduce these risks to an acceptable level.
- Describe arrangements in place to deal with emergency situations.
- Identify those responsible for implementing and maintaining the control measures.

The method statement will typically:

- Describe the sequence and nature of the work.
- Identify timescales and work locations.
- Describe plant, equipment, materials services and personnel required.
- Identify responsibilities for management of health and safety.
- Describe arrangements for monitoring Health and Safety performance.

Notes:

1. Risk assessments and method statements which do not address these issues will be automatically rejected.

2. If, for any reason, the sub-contractor finds that they have to change their working methods in a way that introduces additional risks or significantly increases risks previously identified, a revised method statement and risk assessment must be prepared and submitted to Babcock for review before the work continues.

It is important that the risk assessment and method statement are forwarded to the TR typically 5 working days before the work begins, because they will need to:

- Determine the appropriate level within Babcock at which to review the documentation.
- Identify potential risks from Babcock activities, plant, equipment and facilities that may impact on the Sub-Contractor, and bring these to his attention.
- Assess potential risks to others from the Sub-Contractor activities and ensure that the necessary controls are put in place.
- Identify and resolve potential conflicts between the Sub-Contractors work activity and other adjacent or parallel operations.

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#### Subcontractor Supervision:

- Well informed, responsible and authorised supervision is to be present at all times that work on site is to be undertaken including all work carried out after “normal hours”. Where such work is planned reference shall be made in the method statement.
- All Sub-Contractors must furnish the TR with an updated list of management contact numbers who will be available and authorised to respond to emergency requests outside normal hours.

#### 4. Generic Method Statements & Risk Assessments

The Dockyard site has many potential hazards that may not be commonly found on other industrial sites with which the Sub-Contractor is familiar. Sub-Contractors are advised to be cautious in the use of generic method statements and risk assessments. Where the Sub-Contractor submits a generic method statement or risk assessment it must be accompanied by written confirmation from the Sub-Contractor, signed by a competent person, to the effect that it has been compared against the specific conditions that will apply on the Babcock site and found still to be valid.

#### 5. Review & Acknowledgement of Method Statements & Risk Assessments

Babcock will review method statements and risk assessments submitted by the Sub-Contractor. Any necessary additions or revisions will be communicated to the Sub-Contractor who may not start work until the additions or revisions have been addressed and the revised method statement or risk assessment formally acknowledged by Babcock.

The acknowledgement by Babcock of any method statement or risk assessment shall not, nor shall it be deemed or construed to be an approval thereof in whole or in part by Babcock. Notwithstanding acknowledgement by Babcock of the Sub-Contractor’s method statement or risk assessment, the Sub-Contractor remains responsible and liable for meeting its obligations under any and all relevant laws, statutes, regulations, orders and directives in respect of health and safety.

#### 6. Nuclear Licensed Site

The Nuclear Licensed Site is bounded by a blue line and notices placed at entry and exit points. Work on the Site, plant or facilities associated with it, are subject to further controls and the Sub-Contractor is to confirm the exact requirements for method statements and risk assessments with the TR and the relevant Infrastructure Control Office (ICO).

To ensure safety of the Nuclear Site or nuclear activities, no work is to be undertaken on the Licensed Site without the agreement of the relevant Authorisation Group (FPAG/XSAG) No work is to be undertaken outside of the agreed boundary or the agreed work package without recourse to the TR and the relevant Authorisation Group (FPAG/XSAG).

#### 7. Liaison with Building Controllers

Every building under Babcock control has a nominated Building Controller who has specific duties in respect of Fire, Health and Safety precautions within the area. Before entering any building to carry out work, the Sub-Contractor shall locate and make themselves known to the Building Controller. They shall describe to the Building Controller the nature and extent of work intended to be undertaken and shall

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comply with any instruction given by the Building Controller in respect of conduct during the work.

The Building Controller will formally communicate to the Sub-Contractor any information regarding the work location and activities carried out therein that may be needed by the Sub-Contractor to formulate the method statement, risk assessment or emergency arrangements.

The Sub-Contractor must likewise formally communicate to the Building Controller any information about the work activity that could present a risk to persons, plant or equipment or to the building itself. The controls necessary to address these risks shall be agreed jointly between the Building Controller, TR and Sub-Contractor, and included in the Sub-Contractor's method statement and/or risk assessment.

In the absence of the Building Controller, the Sub-Contractor should contact the Deputy Building Controller or Building Manager.

The Sub-Contractor shall ensure, in conjunction with the Company Fire Officer that reasonable means of escape in case of fire remain available and that occupiers are aware of the hazardous operations.

Where flame or spark producing apparatus is to be used the Sub-Contractor shall:

- Notify the Building Controller where they are working and for what period the apparatus will be used. They must also inform the Building Controller at the time of their departure.

## **8. Nuclear Safety Implicated Buildings, Berths, Docks or Subways**

There are a number of Nuclear Safety Implicated Buildings within the Babcock Site for which specific approval of the Licensed Site Manager or nominated Plant Manager is required before the commencement of work.

A list of Nuclear Safety Implicated Buildings is available from the TR.

## **9. Environmental Protection & Waste Disposal**

Babcock is required to protect the environment from detriment due to any process conducted under Babcock control.

The Sub-Contractor shall not discharge or allow to be discharged into the environment, any substance that is harmful to the environment, nor shall such substances be stored or deposited at any location from which they may subsequently enter the environment.

The Sub-Contractor is legally responsible for the disposal of all waste arising from their operations.

The Sub-Contractor is also required to notify Babcock if they become aware of any contamination.

The Sub-Contractor shall provide evidence to demonstrate that he is compliant with The Waste (England and Wales) (Amendment) Regulations 2014 which would include a copy of the waste carriers "Certificate of Registration"

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## 10. Compliance with Babcock Instructions in Respect of Health & Safety

Whilst on site, all Sub-Contractor personnel shall comply with any reasonable instruction given by a representative of Babcock Health & Safety Department in respect of their conduct, use of personal protective equipment, equipment, materials or methods of work.

## 11. Training

Legislation continues to emphasise the significance of information, instruction and training. Sub-Contractors shall ensure that their employees are competent to carry out their work, are aware of all risks associated with it and the control measures necessary for safety. Sub-Contractors will be expected to be able to prove the competence of their employees.

Employees of the Sub-Contractor who require a permanent photographic pass to undertake work at the Dockyard must attend a Safety Induction course and successfully complete the associated multiple-choice test. Attendance on this course is mandatory before security passes to the Dockyard or the fenced area at the Submarine Refit Complex (SRC) or 9 Dock can be issued. Those attending will be subject to a refresher induction course after 6 months.

The full Safety Induction course must be repeated every three years and security passes will only be re-issued once a refresher course has been satisfactorily completed. The course is run within the Dockyard and the Sub-Contractor is required to ensure that their employees have completed the induction process (both initial and 3 year refresher) in good time to meet contractual commitments.

Attendance on the induction course is normally the minimum requirement and advice should be sought from the TR. It does not negate the need for additional health, safety or fire training which employees of the Sub-Contractor may require by virtue of the work which they are contracted to perform.

Sub-Contractors should ensure that they and their employees are given a local safety induction for the areas in which they are employed.

## 12. Legal Duties of Sub-contractor Employees

All Sub-Contractors employees should be aware that they have a duty, under Sections 7 and 8 of the Health and Safety at Work Act 1974, to take reasonable care of their own safety and the safety of any others who may be affected by their acts, or omission, and also to co-operate with the Employer and others to enable them to comply with their duties under the Act.

The Act prohibits the intentional, or reckless interference with, or misuse of, anything provided in the interests of health, safety and welfare.

Severe penalties can be imposed on anyone found guilty of an offence under the Act.

This duty shall be brought to the attention of all Sub-Contractor employees.

## 13. Smoking

Sub-Contractors shall bring to the attention of their employees the following restrictions on smoking which includes; the use of artificial smoking devices such as smokeless cigarettes or e cigarettes.

Smoking is not permitted anywhere on any Babcock site during paid working hours, i.e. smokers can only smoke on the Babcock site when on their way into work, during

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their recognised unpaid lunch break, and on their way home in areas not designated as No Smoking Areas

No Smoking Areas are:

- Any Babcock owned or controlled building (including the Frigate Refit Complex (FRC) and any alleyways or access/drive ways of the Main Factory).
- Any temporary building, which is substantially, enclosed i.e. a scaffold structure covered by a tarpaulin (Building Managers of temporary buildings are responsible for ensuring that they comply with the statutory signage regulations).
- Any doorway to any building-
- Any area immediately surrounding any building. This is interpreted as within 5 metres of any building wall, door or window.
- Ships, submarines or any other vessels.
- All vehicles under Babcock control, including pool cars, hire cars, cranes, forklifts, cherry pickers etc.

Note: Areas within which smoking and other sources of ignition are prohibited due to local safety hazards, such as the presence of flammable materials, will continue to be identified in the normal way by signs.

- The Company may at its discretion create a No Smoking Area where it is considered a fire or safety hazard exists or the area is restricted in terms of providing adequate ventilation to prevent any risk of secondary smoking. Such areas will be clearly designated by use of No Smoking Signage.
- Sub-Contractors will be responsible for ensuring their employees are aware of this policy, ensuring their compliance and for taking the appropriate action for breaches of the policy.

#### 14. Drugs & Alcohol

Sub-Contractor employees are subject to the requirements of the Babcock Drug & Alcohol Testing, Medical Review, Assessment & Treatment/Rehabilitation Policy OH(D)-POL-001 in that they may be required to undergo drug and alcohol testing in the event that:

- There is reasonable cause to believe that they are at work under the influence of drugs or alcohol.
- They are involved in an accident or incident and there are reasonable grounds to believe that drugs or alcohol were a contributory factor.

Failure to co-operate in the testing process will result in the individual being removed from the site and their security pass withdrawn.

Sub-Contractors shall bring to the attention of their employees the following restrictions on the use of drugs and alcohol:

- The use, or possession, of drugs (other than those properly prescribed for medical reasons) on the Dockyard site is prohibited.
- Consumption of alcohol on the Dockyard site is prohibited.
- The bringing of alcohol onto the Dockyard site is prohibited.

Where a Sub-Contractor has reason to believe that one of his employees is under the influence of drugs or alcohol whilst on the Dockyard site, they shall immediately remove that individual from the Dockyard site. The TR shall be informed immediately

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and the individual may not be re-admitted to the Dockyard site without the written permission of the TR.

These requirements are in addition to the sub-contractors own drug and alcohol policy. It is a requirement of the sub-contractor to notify the TR of any non-negative or positive drug and alcohol test undertaken within their policy for persons on a Babcock site.

### **15. Young Persons**

No person under the age of 18 is allowed to drive or operate any mechanical vehicle or plant unless competent or being trained under the close supervision of a competent person. The TR shall be informed if any young person is brought into the Dockyard. Risk assessments must consider the specific factors for young people and identify and implement suitable controls.

No person under the age of 18 may be designated as a Classified Person for work with ionising radiations and such persons may only enter a Babcock radiologically controlled area under a Written Scheme of Work as agreed with Health Physics Dosimetry Section.

### **16. Boarding ‘T’ Card Access**

All Sub-Contractors who board Ships or Submarines or who enter dry docks or secure docksides under Babcock control shall comply with Babcock requirements in respect of boarding cards.

Boarding cards, obtained from Babcock Berthing Manager or TR, shall be indelibly marked with the employee’s name, company and contact telephone number. Sub-Contractors shall use yellow boarding cards.

The card should be placed in the rack provided at accesses/brows when the employee enters the area under control, and removed on exiting the area under control.

Sub-Contractors should note that the sole purpose of the Boarding “T” Card system is to assist search and rescue in the controlled area in the event of an emergency.

Sub-Contractors conducting work on the tidal X berths require an additional boarding card to register their presence on these berths. These can be obtained from the Berthing Manager on request from the Sub-Contractors sponsor and the Sub-Contractor having been given a tidal X berth safety brief.

### **17. Reporting Accidents Near Misses and Investigations.**

Sub-Contractors shall make themselves aware of the location of the Occupational Health Centre and means of communication therewith. They shall ensure that all their employees are made aware of this information.

All accidents to Sub-Contractor’s personnel whilst working in the Dockyard shall be recorded in the Sub-Contractor’s Accident Book and reported to the TR and the Health and Safety Department.

Sub-Contractors shall promptly notify Babcock of any near miss event, together with the improvement plans to be implemented as a result of such incident.

Sub-Contractors must co-operate to their fullest extent with Babcock, on any investigation or inquiry undertaken in relation to health, safety and/or environmental management and protection.

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In accordance with the requirements of the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR) the Sub-Contractors shall immediately:

- Inform the TR and the Health & Safety Department when the accident results in a fatal or major injury.
- Record details on Form F2508 of Fatal, or Major Injury and Dangerous Occurrences, and Form F2508A for Reportable Diseases and send the form to the Health and Safety Executive.

Specifically, any incident in which the malfunction of a radiation generator or its ancillary equipment used in fixed or mobile industrial radiography causes it to fail to de-energise at the end of the intended exposure period or the malfunction of equipment used in fixed or mobile industrial radiography causes a radioactive source to fail to return to its safe position by normal means at the end of the intended exposure period shall be reported immediately to the TR who shall inform the Nuclear and Radiological Safety Manager immediately.

Sub-Contractors should note that the contact number within the Devonport Site for summoning emergency services is 2222, (from a mobile phone, 01752 552222). Sub-Contractors should verify emergency arrangements at outstations and other remote sites.

When contacting emergency services the following information must be provided:

- Devonport Royal Dockyard.
- Nature of Accident.
- Building, Dock or Wharf Number/Location.
- Post Code PL1 4SG.
- Caller ID and Contact Number.

Note: When calling the emergency services consideration should be given to the range of services that may be required, not only to treat but also to recover the casualty from the incident area.

## 18. Welfare

Unless otherwise provided for in the Sub-Contract, prior to commencing work, it shall be agreed which welfare facilities are to be provided by Babcock and which by the Sub-Contractors i.e. sheltered accommodation for meals/clothing, washing facilities, sanitary conveniences, etc.

Any facilities provided by Babcock shall be maintained in a safe and clean condition and any person wilfully damaging such facilities shall be liable to summary removal from the site The Sub-Contractor will be responsible for any incurred cost for repair and or replacement.

Any facilities provided by the Sub-Contractor shall be to a standard acceptable under the Workplace (Health, Safety and Welfare) Regulations 1992.

## 19. Maintaining Means of Escape/Emergency Access

The Sub-Contractor shall ensure that activities do not obstruct the means of escape from buildings or vessels e.g. by erecting scaffolding outside fire exit doors. Also they shall ensure that they do not obstruct emergency access to buildings or vessels e.g. by storing materials in roadways.

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**Note:** **GREEN ROUTES** are primary routes for access and egress along the dockside and onboard vessels (especially important for fast evacuation). They are marked with green tape, green paint and/or green carpet. The routes are “**ZERO OBSTRUCTION ROUTES**” clear of all obstructions. Services can be run underneath, in bridges or above green route but not through the chosen route.

## 20. Housekeeping

Sub-Contractors shall keep their work areas clean and not allow rubbish and scrap, etc. to accumulate. They shall ensure that they leave the working area in a tidy and safe condition.

## 21. Protective Equipment

It is the responsibility of each Sub-Contractor to ensure that their employees are provided with the necessary protective equipment.

All Personal Protective Equipment, identified by mandatory signage or, within their method statements and risk assessments must be provided by the subcontractor to their employees.

In addition, it is mandatory that Sub-Contractors' and their employees wear safety helmets for construction activities.

## 22. Noise

Where any activity is carried out by the Sub-Contractor that is likely to expose either their own personnel or other persons to noise levels in excess of those stated in The Control of Noise at Work Regulations 2005, the Sub-Contractor shall submit an assessment to the TR for review, at least 5 working days before the activity is scheduled to commence.

The Sub-Contractor shall ensure that warning signs are posted and appropriate health surveillance is provided for all employees exposed to high noise levels.

## 23. Temporary Offices & Huts

Temporary offices, huts, etc. shall not be brought on to site until their siting location and appropriate fire precautions have been agreed with the TR and the Company Fire Officer. Such accommodation shall be erected in an area with 4.5m - 6m clearances, to prevent fire hazard, and an adequate number of fire suitable extinguishers shall be provided.

Any electrical installation shall be properly and safely installed and maintained in good working order.

## 24. Statutory Documentation

Details shall be correctly entered in all statutory registers, notices and certificates and be available for inspection upon request by the TR.

## 25. Use of Babcock Services

Written permission shall be obtained from the TR (and in accordance with the contract) before any Sub-Contractor couples up to any service i.e. electrical, compressed air, fire hydrants etc. The Sub-Contractor shall ensure that proper and compatible connections i.e. air hose couplings, electrical plugs are used.

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With portable electrical supplies, only low voltage (110V) tools shall be used and these are to be supplied from a suitable transformer. Portable tools and extension leads shall be fitted with proper plugs and never connected by inserting bare wires into a socket or junction box.

## 26. Use of Babcock Waste Skips

Sub-Contractors shall observe the processes that govern disposal of materials and only use Babcock waste skips if authorised to do so. These processes specifically prohibit disposal of any liquid waste and the following substances in this way:

- Toxic or flammable materials.
- Oxidising agents.
- Scrap metal.
- Hoses.
- Sealed containers.

Any container placed in a waste skip shall first be treated such that no part of the container can become pressurised during compaction.

*Babcock waste skip colour code system:-*

White – International catering waste.

Yellow – General waste (waterfront).

Blue – General waste (inland).

Purple – Marpol waste.

Red – Cardboard waste.

Orange – Scrap metal waste.

The disposal of waste brought onto the Dockyard Site will result in prosecution.

## 27. Breaches of the Policy

Sub-Contractors are advised that failure to comply with the requirements of this Policy may result in the termination of their Sub-Contracts and/or summary removal from site of any of their offending employees and the Sub-Contractor solely shall be responsible for the costs that may result from such termination or removal.

Babcock's decision, on whether or not a breach or failure to comply has occurred, shall be final and binding on the Sub-Contractor.

## 28. Sub-Contracting by Sub-Contractor

The Sub-Contractor is required to include, and shall be deemed to have included, copies of this Policy in any Sub-Contract that they may issue and to make compliance with this Policy a Condition of any such Sub-Contract.

Where the Sub-Contractor employs a Sub-Contractor, they must be able to demonstrate that they have suitable management arrangements in place for the selection of the Sub-Contractor and the control and monitoring of that Sub-Contractor whilst undertaking the work activity.

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## 29. Asbestos

### *Building work*

Before ANY work which could disturb building materials or services commences, the TR shall check the asbestos register/database either through MAXIMO or by contacting the Estates Department. If no information exists, a survey or sampling shall be arranged as necessary before work commences. Surveys and sampling must comply with the Control of Asbestos Regulations 2012.

If asbestos is found, or presumed to be present, no work can commence which could disturb this material unless it has been assessed by a competent person in accordance with the Control of Asbestos Regulations 2012, and a plan of work prepared, which should be submitted to Health and Safety Department or Safety Support Manager for review at least 5 working days before start.

Note: Any major work on asbestos insulation, coating or insulation board (AIB), must be carried out by a licensed asbestos contractor.

### *Work on plant which could contain asbestos*

The sub-contractor shall not work on any fixed or portable plant which could contain asbestos unless the suspect material has been sampled and found not to be. If asbestos is found, or presumed to be present, no work can commence which could disturb this material unless it has been assessed by a competent person in accordance with the Control of Asbestos Regulations 2012, and a plan of work prepared, which should be submitted to the Health and Safety Department or Safety Support Manager for review at least 5 working days before start.

### *Ban on asbestos*

In accordance with the Control of Asbestos Regulations 2012 the sub-contractor shall not supply or use any form of material containing asbestos.

### *Asbestos awareness training*

For work which could disturb building materials, services or plant potentially containing asbestos, the sub-contractor shall ensure that staff and the staff of any sub-contractor appointed are provided with adequate training. Part of this training must be to inform their staff that an asbestos survey report is not an absolute guarantee that all asbestos has been identified and that they should instruct their staff to stop work and check with their supervisor whenever they suspect they could be disturbing asbestos.

## 30. Confined Spaces

Contractors and employees shall not enter live foul sewers, manholes, tanks or other confined spaces without the necessary tests being carried out and a safe system of work being in place, including suitable and sufficient emergency arrangements.

All work in confined spaces must, as a minimum, meet the requirements of the Confined Spaces Regulations 1997.

Contractors when undertaking work that may involve entering confined spaces will ensure:

- The work being undertaken has the authorisation of the Confined Space Controller for that particular confined space and in consultation with the TR.

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- That the entry is undertaken only where there is no reasonable alternative method available to carry out the task
- That the entry and its associated activity have been subjected to a risk assessment and this is recorded.
- That a safe system of work/method statements have been devised, based on the risk assessment and promulgated to the workforce.
- It can be confirmed that the employees are medically fit and competent for undertaking such work.
- Where applicable subcontractors may need to attend the Babcock in house confined space awareness course supplied by the Health and Safety Department.
- That suitable and sufficient emergency arrangements are in place and their effectiveness has been tested. These arrangements are the sole responsibility of the Sub- Contractor.
- That all necessary permits are in place and their requirements are observed.

The Sub-Contractor shall note that any and all Certification of the confined space for entry in respect of the work shall only be carried out by qualified staff from Devonport Materials and Environmental Laboratory (DMEL). This service shall be arranged through the TR.

The charge levied in this respect shall be at the discretion of DMEL. The above requirement may be waived for construction/estates based maintenance activity by prior agreement between the Health and Safety Department or Safety Support Manager.

No Sub-Contractor is to enter the dock culvert system without the permission of the Berthing Manager and the Caisson Section Manager.

Access to subways and galleries is strictly controlled by the Control Engineer or ICO.

### **31. Use of Internal Combustion Engines in Enclosed Spaces**

Internal combustion engines i.e. those using fuels such as LPG, diesel, petrol etc as a fuel produce carbon monoxide and carbon dioxide as exhaust. When these are used in enclosed spaces these exhaust gases represent a specified risk and may give rise to confined space conditions as identified in the Confined Spaces Regulations 1997. Protocol

The use of internal combustion (IC) engines in enclosed spaces must be avoided in the first instance and other means for conducting the activity sought.

By exception, with the agreement of the TR and only where there is no reasonably practicable alternative and the use of IC engines is the only means of taking the activity forward then:

- The risk assessment/method statements must take account of specified risk.
- The risk assessment/method statements must be reviewed and acknowledged by the Health and Safety Department or Safety Support Manager.
- Effective safeguards and emergency arrangements must be in place prior to and for the duration of the activity.

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### 32. Explosives

Explosives shall not be brought into the Dockyard without permission of the TR and the Devonport Explosives Safety Advisory Group (DESAG). The permission of the Licensed Site Manager is required in addition before explosives can be brought onto the Licensed Site.

The Sub-Contractor shall discuss matters such as the method of storing, transport, personnel safety, general precautions, shot firing equipment and procedure for misfires etc. with the TR.

Only persons who are not less than 21 years of age and who are properly experienced in their controlled application shall use explosives.

All conditions of the Explosives Regulations 2014 shall be fully observed and complied with.

Contact details for DESAG are room 2/s Building B128 Howard Block, Fleet Accommodation Centre, HMS Drake PL2 2BG - Tel; 01752 55 ext (6)5173 or (6)5188.

### 33. Demolition

All demolition work shall be carried out in accordance with the Construction (Design and Management) Regulations 2015. Guidance to safe practices can be found in British Standard Code of Practice BS 6187:2011

All necessary steps shall be taken to warn, and prevent the approach of, persons who may be endangered by these operations.

Special precautions shall apply should the demolition involve handling any material suspected of containing asbestos or any other hazardous material.

### 34. Work with Lead

Where applicable, the Sub-Contractor shall conduct the work in accordance with the Control of Lead at Work Regulations 2002 and the associated Approved Code of Practice.

Before the Sub-Contractor carries out any flame cutting, welding or mechanical abrasion of painted metal originating from or within Devonport Dockyard they shall first carry out an analysis of the paint composition to ascertain the presence of lead. This analysis shall be arranged through the TR.

An employer shall not carry out work which is liable to expose any employees to lead unless he has made a suitable and sufficient assessment of the risk created by that work to the health of those employees

All Sub-Contractor employees liable to be exposed to lead should receive medical surveillance from a suitably qualified doctor.

### 35. Cartridge Tools

Cartridge tools shall not be brought onto site without the written permission of the TR and the Devonport Explosives Safety Advisory Group (DESAG) and, except for certain specialist applications, only low power; indirect acting type tools shall be used.

No persons under the age of 18 shall be allowed to use a cartridge operated fixing tool. All persons permitted to use such a tool shall be properly trained and shall possess a Certificate stating which tools they are competent to use.

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Before using any cartridge tool, all precautions shall be taken to ensure that no-one, either operative or other person, is at risk from the operation i.e. fixing device passing through structure, explosion etc. and protective equipment shall be used i.e. eye protection.

The storage and safe keeping of cartridge tools and cartridges are the responsibility of the Sub-Contractor and they shall ensure that there is a controlled distribution and return of all cartridges. Under no circumstances shall unspent cartridges be left lying around the site of the work.

### **36. Plant**

All plant brought into the Dockyard shall be of good mechanical construction, properly maintained and suitable for the purpose used. The Sub-Contractor shall ensure that all necessary inspections and tests have been carried out and all relevant documentation is available. All plant shall be operated by, and be under the control of a competent person, who shall ensure that there is no unauthorised operation.

Sub-Contractors shall not operate Babcock plant without written permission and Sub-Contractors shall ensure that any plant made available is in a safe condition before being put to use.

### **37. Lifting Operations**

It is the responsibility of the Sub-Contractor to ensure that all lifting equipment brought onto the site is in compliance with the Lifting Operations and Lifting Equipment Regulations 1998.

All relevant statutory documentation shall be available for inspection.

The Sub-Contractor shall ensure that all lifting operations are carried out under the direct control of a suitably qualified Appointed Person as described in BS7121, Part 1 (Safe Use of Cranes). The name and qualifications of the Appointed Person shall be made known to the TR.

The Sub-Contractor shall not acquire or use lifting equipment owned by Babcock. All lifting equipment brought onto site by the Sub-Contractor shall be kept in a secure place when not in use.

#### *Authorisation to undertake slinging operation*

For persons to undertake slinging operations within the control of DRDL or utilising cranes provided by DRDL then the operators are to be in possession of a recognised, valid slinging certificate that is appropriate to the work being undertaken. This must be presented to the Lifting Services Manager's organisation who, if satisfied with the level of qualification, will issue a Devonport Authorised Slinging Card on completion of a slinging induction brief.

This authorisation will be colour coded to indicate the type of activity the card holder may undertake:

Blue card - indicates a Babcock Functional Slinger

Red card - indicates a Sub-Contractor Slinger

Green card - indicates the holder may only act as a crane pilot

Yellow card - indicates the Babcock holder may undertake straight lifting activities only.

Restrictions apply to the use of mobile cranes in specific areas of the Dockyard. It should be noted that no mobile crane shall be brought into or operated in the Naval

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Base without the prior approval of the Crane Department. The Sub-Contractor shall contact the TR prior to undertaking any lifts to ensure that the necessary Permits have been obtained.

### **38. Machinery**

All machinery and plant brought onto site shall be fully safeguarded and protected in accordance with legal requirements. Guards removed at any time for the purpose of maintenance, repair or inspection etc. shall be put back into place before the machine is used. No machine guards shall be removed from Babcock plant.

### **39. Pressure Systems**

All mobile pressure systems and transportable gas containers brought on site shall comply in all respects with the Pressure Systems Safety Regulations 2000.

Prior to connecting any mobile pressure system e.g. compressor, the Sub-Contractor shall verify that all systems and components downstream of the pressuriser have a safe working pressure compatible with the maximum pressure which can be developed. Where this is not the case, the Sub-Contractor shall ensure that the maximum outlet pressure from the mobile pressure system is suitably regulated.

The Sub-Contractor shall not modify or interfere with any installed or mobile pressure system owned by Babcock.

### **40. High energy systems**

High energy systems such as electrical, hydraulic, steam and gasses require safe working practices to reduce or eliminate the risk to personnel. To control access to these systems, Babcock Business Units utilise various Tag out Lock out procedures - to provide both physical and visible states of isolation. Therefore, Babcock Business Units and the Subcontractor management teams must identify and implement these procedures and ensure they are incorporated within the method statements and risk assessments.

### **41. Abrasive Wheels**

All grinding machines brought onto site shall comply with the Provision and Use of Work Equipment Regulations 1998 and HS(G) 17 Safety in the use of abrasive wheels. The Sub-contractor must ensure that only competent persons use, mount or change abrasive wheels. All guards and work rests must be used and suitable personal protective equipment worn by the operatives in accordance with their risk assessments.

### **42. The Control of Substances Hazardous to Health Regulations 2002**

The Control of Substances Hazardous to Health Regulations 2002 (COSHH Regulations) require that a full assessment of risk is to be carried out prior to commencement of work whenever substances hazardous to health are to be used.

COSHH assessments shall be provided in advance of work commencing.

The Sub-Contractor is advised that copies of Hazard/Safety Data Sheets do not represent an adequate assessment in law and will not be accepted as such.

The Sub-Contractor is advised to pay particular attention in the assessment to the possible existence of neighbourhood workers i.e. those not directly involved in the

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process but who may be affected by it. The risks to and precautions taken for such neighbourhood workers must be adequately specified in the assessment.

### 43. Radioactive Substances

Nuclear Site Licence and Authorisation govern the use of Radioactive Substances at Devonport and it is essential that the safety requirements governing their use and storage is strictly adhered to. Therefore no radioactive substance which includes radiography sources shall be brought onto site without providing the written permission from the TR in accordance with the Control of Radioactive Substances.

### 44. Working at Heights

All work at heights shall be carried out within the requirements laid down by the Work at Height Regulations 2005.

All scaffolding shall be of sound design, construction and erected by a competent person. Where scaffolding is of a complex design or can affect the stability of the support structure the design may need to be reviewed by the Technical Department via the TR. These may include the calculations and criteria used to justify the integrity and suitability of temporary scaffolding and its load on its adjacent structure.

The default position for access to scaffold platforms/ scaffold support structures for DRDL personnel shall be via a scaffold stair case. The only exceptions shall be where a platform is being used for short duration tasks (5 or less working days) or, where the site is too confined to allow a stair case for access. If an access ladder is used, consideration must be given by the scaffold designer to the latest guidance on access ladder construction and protection against falls based on a single lift maximum distance and access bays. These details are to be identified within the purchase order agreement. Sub-contractors are not restricted to using a stair case for their employee's or sub-contracted work, if they supply a risk assessment justifying the alternative access/ egress arrangements.

Sub-Contractors shall not alter/modify any scaffolding e.g. removal of guardrails, toe-boards, ties etc. unless competent and authorised.

Scaffolding inspections shall be carried out as required by the Work at Height Regulations - i.e. every 7 days, or after inclement weather. The competent person who has carried out the inspection shall record the details of inspection in a suitable Register. This Register shall be kept on site and be available for inspection by the TR.

The Sub-Contractor shall adopt a "Scafftag" arrangement for all scaffolding erected for the purpose of his work. The Scafftag shall indicate whether the scaffold is safe to use and the loading for which the scaffold was constructed. Following each statutory inspection of the scaffold carried out by, or on behalf of the Sub-Contractor, the Scafftag shall be indelibly marked with the date of the inspection and the signature of the competent person who carried out the inspection.

During roof construction, or repair, the correct edge protection, guardrails and toe-boards, shall be used. The access ladder on the roof shall be secured and crawling boards shall be utilised for all fragile roof and leading edge operations. Crawling board platforms at roof leading edges shall comprise a platform at least two boards wide, which incorporates a guardrail. All translucent sheets shall be highlighted and no materials, unless securely tied, shall be left on the roof during periods of inactivity.

The Sub-Contractor shall ensure that their employees are fully conversant with the Health and Safety in Roof Work HS(G)33 and shall further ensure that all guidance contained therein is followed.

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#### 45. Mobile Elevating Work Platforms (MEWPs) - Boom Type

Only MEWPS that have been assessed and deemed suitable for the activity can be brought into use on site. No person shall be permitted to operate a MEWP unless selected as physically and mentally fit, have been trained, assessed as competent and authorised to do so. Training must be by a nationally accredited body such as IPAF

All MEWPs, as a minimum, shall be fitted with an electronic device such as skysiren and a structural operative protection system (SOPS) such as Sanctuary zone or OPS to prevent entrapment of the operator. The removal of any or all of the above devices would need to be fully justified and supported by a specific risk assessment.

MEWPs must carry in their documentation a valid certificate of thorough examination required by the Lifting Operations and Lifting Equipment Regulations 1998.

The operator shall, at the start of each day, carry out "pre-start up" checks of the machine in line with the manufacturer's requirements and recorded on a checklist.

Those responsible for the MEWP activity shall ensure that:

- There is a valid risk assessment that has been briefed to those undertaking the activity.
- A trained ground-man is provided for the duration of the MEWP activity who keeps the team within the MEWP in clear line of sight at all times. The ground-man must be able to demonstrate use of the ground controls to lower the MEWP platform prior to the work activity commencing.
- The Safe Working Load (SWL) of the platform must not be exceeded i.e. the total combined weight of personnel, tools, materials and SOPS. The operator shall check to ensure the load is within the capacity of the MEWP.
- All personnel shall wear a safety harness whilst in the platform or, when the platform is over water, a life jacket shall be worn in substitution for the safety harness
- A lanyard shall be fitted to the safety harness and connected to the MEWP. The lanyard should be adjusted to the minimum length so that the operator is held in restraint, but able to carry out their duties.
- A safety harness and suitably adjusted and anchored lanyard shall also be worn by personnel using a scissor lift, unless a risk assessment justifies otherwise.
- When there is a requirement to drive a MEWP in a dock or other restricted space a pilot shall be provided. (The pilot may also function as the ground-man for the MEWP).
  - The pilot must wear high visibility clothing (Tabard etc.)
  - Keep in plain view of the driver and maintain communications - visual and verbal
- The hirer of the MEWP shall arrange for the collection of the keys, under no circumstances shall the keys be left in the MEWP.
- Emergency arrangements are in place and briefed prior to the commencement of any MEWP operations. These would include but not be restricted to platform

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recovery from the ground or, in certain circumstances, MEWP to MEWP recovery of operators. The method chosen should be recorded and briefed to ensure that all parties understand their role and actions should an emergency occur.

Where MEWPS are to be lifted then the lift must be planned and be under the control of an Appointed Person who will use the suppliers lift plan as the basis of the assessment and planning of the lift. Suppliers are required to provide all relevant information necessary for planning the lift

The suppliers lift plan should include as a minimum:

- The location of the certificated lifting points
- The estimated load of the MEWP
- Its centre of gravity
- Particulars of any lifting arrangement required i.e. spreader beams.
- Location of slew locking pins or similar devices for stabilising the MEWP

#### **46. Excavations**

All excavation work shall be carried out in compliance with the Construction (Design and Management) Regulations 2015.

Before work commences, the Sub-Contractor shall ensure that there are no services in the vicinity of the area to be excavated. Where live services are present, then hand excavating shall be carried out initially until the exact location of the service has been identified and made safe.

Edge protection shall be erected around excavations and all necessary support work/battering carried out. Excavations shall be inspected by a competent person in accordance with Regulation 22 and 24 of the Construction (Design and Management) Regulations 2015 and a record of these inspections shall be kept in a suitable format and readily accessible to the TR.

Any excavating machine employed in lifting operations such as the positioning of pipes etc. shall have a rated object handling capacity table available inside the cab. If it is not available then the machine shall not be used for object handling.

No intrusive work is to be undertaken without an Approved Site Clearance Certificate raised by the TR. Such work includes:

- Driving posts into the ground and the planting of trees.
- All ground excavations of any form within the confines of the Naval Base, Babcock Site and associated outstations.
- Penetrating the structure or fabric of buildings for the purpose of fixing an item to, making any alterations to or physical repairs of the structure or fabric.

Raising of manhole covers, nuclear service trench covers and the like, with the exception of:

- Manhole covers for inspection purposes or crane supply points which are hinged and captive.
- Covers on foul or storm drain systems.
- Pit covers over system valves where the valve is the only fixture within the pit.

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- Covers over dedicated system trenches where the system is the only service within the trench and is non-nuclear implicated, i.e. steam and condensate.

**47. Identification of Work Areas**

The Sub-Contractor shall erect suitable barriers appropriate to the risk and signs around and/or beneath the work area to exclude those who may be put at risk by entering such areas. The signs shall include the Sub-contractors name and 24 hour contact arrangements. The laying out of “hazard tapes” and the like shall not be accepted as forming a suitable barrier. If necessary, the Sub-Contractor shall post sentries to prevent people entering any area in which they may be put at risk.

**48. Damage to Services**

Before work commences, the Sub-Contractor shall contact the TR in order to seek advice regarding the location of underground services. Where live services are present, then hand excavating shall be carried out initially until the exact location of the service has been identified and made safe.

If any services are damaged, then the Sub-Contractor shall take the following action:

- Electrical Cables: Should any electrical cables be damaged, then everyone in the vicinity shall evacuate the area immediately and position themselves so that no one can approach the damaged cable. The TR shall then be notified. If the TR is not immediately available, Control Engineer shall be advised.
- Gas Mains: In the event of the presence of gas being detected during site operations, either as a result of damage to gas mains, or any other reason, the following emergency action shall be taken immediately:
  - The person in charge shall order immediate cessation of work and clear all employees and personnel from the area.
  - Sentries shall be stationed at a safe distance to prevent personnel from entering the affected area and to ward against smoking and the presence of naked lights. Barriers shall be erected wherever possible.
  - All machines, excavators, compressors, dumpers, pumps, etc. in the area, shall be switched off immediately and left standing. Naked lights and fires shall be extinguished.
  - Notification of an escape of gas, and precise details of the location, shall be conveyed immediately to the Control Engineer and the TR.
  - The Foreman, or Ganger, shall remain on the scene in order to ensure that the area is kept clear until the arrival of the National Grid employees and officials.

In normal circumstances, the locations of gas mains in the vicinity of the Company’s operations are indicated on the drawings furnished by the TR and there is no reason, with the exercise of proper care and supervision during the excavation work, why these should suffer any damage. In the event of uncharted, or apparently disused, gas mains being uncovered, National Grid shall be notified at once, so that tests can be applied to ensure that the pipes are dead. Where there is any doubt as to the location of gas mains, the main office of National Grid shall, on request, make available a drawing showing the location of gas mains in the area concerned.

In all cases where gas mains have been exposed, reinstatement shall be properly consolidated around the pipe. It is a National Grid requirement that under no

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circumstances shall shall be used in the reinstatement, as this has a corrosive effect that could result in a gas leakage at a future date.

Note: Check with your local National Grid Distribution Office for Emergency Service.

Other Services: Should any other services be damaged i.e. telecommunication cables, sewers etc. then the TR shall be notified immediately. If the TR is not immediately available, the Control Engineer shall be advised.

#### **49. Roadworks**

Where operations involve work being carried out on or at the edge of a road, or where diversions, etc. are necessary, then all road signs etc. shall be set out in compliance with the Department of Transport publication - Traffic signs manual.

The TR and the Company Fire Officer shall be informed beforehand when road diversions are required. All road closures/obstructions/diversions should be notified on the relevant form.

#### **50. Driving**

Sub-Contractors bringing vehicles on site shall ensure that they are suitable for the type of work to be undertaken and are maintained in a roadworthy and safe condition. Vehicles shall meet all statutory requirements of the Department of Transport.

Vehicles shall only be operated by authorised competent persons who shall ensure that no unauthorised passengers are allowed on the vehicle. Passengers are only permitted where there is standard fixed seating for passenger(s).

Drivers of vehicles shall leave the cab and position themselves in a place of safety if/whilst a lifting appliance is loading the vehicle.

All loads on vehicles shall be properly secured and vehicles shall never be reversed in a confined area unless a banksman is present.

Vehicle engines shall not be left running when the driver is not seated at the controls.

Sub-Contractors shall not operate Babcock vehicles without permission to do so and they shall ensure that the vehicles are safe for use before being put into operation.

All vehicles moving on site shall travel at a safe speed and adhere to any speed limits that are imposed.

Drivers must be in control of their vehicle at all times. Sub-Contractors shall instruct all drivers that the use of mobile phones or radio equipment is not permitted whilst the vehicle is in motion.

#### **51. Access Passes for Contractors & Visitors**

Access to the Dockyard is controlled by means of passes. Entry to restricted areas within the site is subject to further controls involving the use of special passes and control systems. For site access, contact Devonport Reception Centres for details of the Devonport Security Policy SEC(D)-POL-001.

#### **52. Vehicle Permits**

Permits for vehicles are strictly controlled and limited numbers may be issued to Sub-Contractors who possess a photographic pass and who require regular access for a limited period. Applications are to be made via the Babcock TR and Devonport Reception Centre.

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### 53. Traffic Regulations

Sub-Contractor's personnel are subject to the same traffic laws inside the Dockyard that they are outside. Any contravention will normally result in withdrawal of the permit, banning of the vehicle and/or the driver responsible for a defined period.

Extracts of the Dockyard Traffic Regulations are available from the Vehicle Permit Office at Camels Head.

### 54. Security Alert States

There are special arrangements for dealing with the threat of terrorist attack. The aim is to protect personnel and property from injury and damage. Everyone has a part to play in this strategy and it is essential that a high standard of vigilance be maintained at all times.

On entering the Dockyard you will see a notice board displaying the Security Alert State currently in force. There are three levels of alert status; NORMAL; HEIGHTENED; EXCEPTIONAL, with exceptional being the highest state of alert.

There will inevitably be occasions when delays occur, such as when the alert status increases. Vehicle searches will be undertaken on a random basis prior to entry.

### 55. Photography

Photography and the carrying of photographic equipment (including mobile telephones with image capture capacity) within the Dockyard are prohibited without the specific authority of a Babcock sponsor using form SEC(D)-FM-031 – Such authority must be requested at least 48 hours in advance of the requirement. All pictures taken are subject to security vetting.

### 56. Babcock Pass Notes for Stores & Scrap

To control the movement of stores, equipment, demolition spoil etc. out of the Dockyard, all such materials must be accompanied by a Babcock Pass Note. Materials will not be allowed out without a Babcock authorised signatory.

At the point of exit the form must be handed to the MoD police who will verify that only those listed are being carried. To avoid any misunderstanding it is recommended that a complete list of private tools and equipment be carried at all times.

### 57. Entry into Babcock Radiologically Controlled Areas – Compliance with the Ionising Radiation Regulations 1999

Babcock is required to keep the doses of all persons entering radiologically controlled areas under their control as low as reasonably practicable (ALARP).

Where it is likely that a Sub-Contractor will be required to enter a Babcock radiologically controlled areas it will be necessary to provide notification at least a week in advance so that access and training can be arranged.

Training in radiological protection is examinable and must be repeated every 2 years. Only on satisfactory completion of the training course (half day duration) will a Sub-Contractor be allowed access to the controlled areas.

Any Sub-Contractor requiring entry into Babcock radiologically controlled areas shall provide the Dosimetry Section with all the information requested at the earliest opportunity. All Classified Persons must present an up-to-date Radiation Passbook

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and carry approved dosimetry before entry into controlled areas is permitted. Unclassified radiation workers must provide details of doses accrued during the year in question. In addition, for unclassified radiation workers, a Written System of Work must be agreed between Health Physics Dosimetry Section and the Sub-Contractor prior to entry into controlled areas.

Sub-Contractors shall comply with Babcock Local Rules and in particular Safety Orders (Radiological Protection).

All work undertaken by Sub-Contractors in controlled areas shall be subject to advice from the Babcock Radiation Protection Supervisor (RPS) responsible for that area. Where the work is defined as “working with ionising radiation”, the Sub-Contractors are to notify Babcock of their appointed Radiation Protection Adviser (RPA) and RPS and provide a copy of their scope of responsibilities.

Any queries regarding access to controlled areas or radiation dose records should be made through the Dosimetry Section.

Where work is being carried out on DRDL premises under the direct control of an employer other than DRDL (i.e. off the Licensed Site), the Babcock Sponsor shall consult with the Company’s Radiation Protection Advisor (RPA) to ensure that the radiation employer in control has in place adequate arrangements to meet the requirements of IRR 99 and have adequate rules and instructions for the work.

## 58. Diving Operations

The waters in and around the Dockyard present significant hazards to divers, many of which may be unfamiliar to the majority of diving contractors e.g. operation of dock flooding systems, vessel movements, operation of vessel propulsion systems and suction uptakes, sonar pulses, radiologically controlled areas around nuclear submarines, live munitions, biological and bacteriological hazards etc. It is therefore essential that diving contractors liaise with the Babcock TR and diving supervisor to ensure that the risks and control measures are fully understood and incorporated into the dive plan.

In particular, the attention of diving contractors is drawn to the following:

- The need to comply with Babcock process for the Control of Diving Operations in the Dockyard Port of Plymouth. A copy of this process should be obtained via the Babcock Contracts Department.
- The possibility that divers operating in proximity to nuclear submarines will be required to wear dosimetry and operate in accordance with a written arrangement for working in radiologically controlled areas. If there are any doubts regarding the implications of this requirement, clarification must be sought via the Babcock Contracts Department.

## 59. Standard Fire Precautions and Actions.

The Sub-Contractor is required to comply with all Babcock Fire Prevention measures and instructions in addition to any other conditions of contract relating to fire precautions and shall ensure compliance by any agents contracted by them.

All Company posters and instructions for the action in case of fire are to be complied with and in the event of a fire emergency services called immediately (see section 17).

Sub-Contractors shall ensure that adequate fire precautions are taken, in that they shall adopt a safe system of work that shall be backed up with the provision of readily available and suitable firefighting equipment, as identified by their risk assessment.

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All fires shall be reported immediately to the TR whether or not damage has been caused. If the TR is not immediately available, the Duty Manager (Telephone 3333) shall be advised. Any possible evidence as to the cause of the fire shall be preserved and the Company Fire Officer should be informed.

All Sub-Contractors employees shall have received suitable fire training to ensure that they are fully aware of the action to be taken in the case of fire and know the purpose of, and how to use fire appliances and their location. The training and instruction shall be sufficient to meet the requirements of The Regulatory Reform (Fire Safety) Order 2005.

#### *Fire hazards during work operations*

Vessels, Buildings, Plant and Machinery in the course of erection or undergoing alteration, repair or maintenance are particularly vulnerable to fire and spread of fire because:

- Structural fire and smoke stops such as walls, doors, floors, ceiling or other fire protection measures may be incomplete.
- Combustible materials may be stored or used.
- Techniques employed may involve flame/spark producing apparatus, flammable adhesives or other potentially dangerous processes.
- Fire protection equipment designed for the ultimate protection of the building or vessel may not be in position, or operational.

Areas containing easily ignitable material and places where flames or spark producing apparatus have been used shall be inspected at meal breaks and at the cessation of work to ensure that no conditions exist which might lead to an outbreak of fire.

#### *General site precautions*

To prevent rapid spread of fire, temporary buildings and combustible storage shall be sited, where possible, outside the main buildings and as far apart as space allows.

Access to any Work Site shall be at least 3 metres wide and 4 metres high and shall be kept clear for fire service use.

Fire hydrants shall be kept clear and readily accessible. Indicator tables must not be removed or obscured.

The burning of refuse etc, is not permitted on the site in any area.

Materials that are combustible or are packed with easily ignitable packing materials shall be kept, where possible, in locked stores or rooms secure against intrusion and marked "NO SMOKING".

Combustible refuse e.g. shavings, packing materials etc, shall be collected at least once a day and removed to a safe place.

Combustible refuse that cannot safely be disposed of on Site shall not be allowed to accumulate but shall be removed from the Site.

Fibre insulating board or similar easily ignitable material shall not be used for lining temporary partitions or protective screens.

Where ISO containers or Chacones are used to store hazardous materials a list of the contents is to be fixed to the outside of the container.

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## 60. Highly Flammable Liquids – Flashpoints Below 32°C

Any relevant requirements of the Dangerous Substances and Explosive Atmosphere Regulations 2002 shall be complied with. The TR's advice should be sought to the requirement to raise a Permit to Work Low Flashpoint Paints and Similar Materials.

Highly Flammable liquids shall be kept in strong screwcapped cans, steel barrels, drums or gerricans, all capable of being securely closed. Petrol containers shall be marked "PETROLEUM SPIRIT - HIGHLY FLAMMABLE". Containers for other liquids must be appropriately and legibly marked.

The containers shall be kept in either a locked metal bin (maximum content 270 litres (60 gallons)) provided by the Sub-Contractor or in a well ventilated locked hut having a concrete base, brick walls (or corrugated iron on a brick dwarf wall) and a non-combustible roof. The base to be surrounded by an imperforate, non-combustible sill 150mm high.

Lockers and stores shall be marked to indicate the contents and to warn against smoking e.g. "HIGHLY FLAMMABLE - NO SMOKING - NO NAKED LIGHTS".

Lockers and stores in the open air must be at least 6 metres from boundary fences, roads, and openings to buildings or combustible material and from any source of ignition.

Highly flammable liquids shall not be exposed within 6 metres of a naked flame, electrical apparatus capable of igniting vapour, or any other possible source of ignition.

Decanting of the liquids shall be carried out in the open air or in the store. Empty containers shall be securely capped and returned to store.

Only sufficient of the liquids for immediate requirements shall be taken from store. Empty containers shall be securely capped and returned to store.

Tanks of petrol engines shall not be filled whilst the engines are running.

## 61. Flammable Liquids – Flashpoints Between 32°C – 66°C

Paraffin oil or other flammable liquids shall be stored in:

- Metal lockers.
- Detached buildings or non-combustible constructions.
- The open air well away from buildings.
- A well ventilated room of reasonable fire resisting construction.
- The storage area signed "HIGHLY FLAMMABLE - NO SMOKING - NO NAKED LIGHTS".

Flammable paints in quantities over 50 litres shall be treated as flammable liquids.

## 62. Spraying of Highly Flammable Liquids

All relevant requirements of the Dangerous Substances and Explosive Atmosphere Regulations 2002 shall be complied with. Guidance is given in Health and Safety Executive Guidance Note EH9: "Spraying of Highly Flammable Liquids".

The Sub-Contractor shall provide adequate and safe means of escape in case of fire from all parts of the working area and shall ensure that the process will not compromise means of escape from any other part of the premises.

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Operators shall be made aware of the danger of the process and instructed not to smoke, use matches or cigarette lighters or to operate electric switches or electrical appliances in places where vapour may accumulate.

Portable sources of ignition shall be removed from the working area. Permanent sources of ignition shall be safe, sufficiently remote or isolated from supply.

Note: Electrical switches or other apparatus at floor level capable of producing sparks or high temperature are particularly likely to ignite heavy vapours.

“NO SMOKING” notices shall be provided at the approaches to and within the working area.

Ventilation must be adequate and maintained until the vapours have cleared. In most cases mechanical ventilation, complying with the requirements of the Dangerous Substances and Explosive Atmosphere Regulations 2002 will need to be provided.

Doors to other rooms and corridors shall be closed when not in use.

Only sufficient solution for the day’s work shall be taken to the working area and exposure of the liquid kept to a minimum. Caps and liquids shall be replaced securely on containers, including empties. All containers are to be returned to the main store at the end of the day’s work.

Rags or “masking” material, on which the highly flammable spray deposits may have accumulated, shall be collected and placed in a metal container with a lid and safely disposed of at the end of each working period.

### **63. Compressed Gas Cylinders**

Any relevant requirements of the Dangerous Substances and Explosive Atmosphere Regulations 2002 shall be complied with.

Whether or not the gas is flammable, cylinders shall be kept away from sources of heat or potential fire risks.

Full and empty cylinders not in use shall be kept in a safe position under cover in the open air or in a store which the Sub-Contractor shall provide external to the main building or vessel, constructed of non-combustible material; the store to be well ventilated and free from risk of outbreaks of fire. When handling cylinders, care shall be taken not to damage valves.

Only the cylinders required for operating an appliance shall be brought into a building or enclosed space. In the case of liquefied petroleum gas (LPG) cylinders the capacity shall not be greater than 15kg.

Compressed gas cylinders taken on board vessels shall be tagged and registered on and off the vessel and must be located on the weather deck.

Note: Unlike mains gas, LPG’s e.g. butane and propane are heavier than air and may accumulate at low level.

### **64. Flame or Spark Producing Apparatus Including Hot Work**

No welding, burning, brazing or similar activity shall take place until a valid Hot Work Permit has been completed and issued to the Sub-Contractor by the TR. This requirement applies to all vessels, buildings and structures. Personnel carrying out such duties must be competent and attended the Babcock in house Hot Worker / Fire Sentry training course.

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Welding, cutting, brazing, blowlamps, plumbers' furnaces and other flame or spark producing apparatus shall be operated only by skilled tradesmen, each of who shall be aware of the following precautions.

All litter, rubbish and combustible material shall be removed from the vicinity of the work. Where combustible material is fixed and immovable it shall be protected with non-combustible material such as sheet metal or fire blanket.

Floors, which might otherwise be damaged, shall be protected from the heat of flames and hot slag.

Special care shall be taken to prevent flames, sparks or molten metal reaching combustible material along or down ducts, channels, chases, or open-ended pipes, or through holes in walls and floors. Non-combustible material shall be used for temporary plugging of holes.

The possibility of damage by heat which may be conducted by metal work e.g. through partitions/bulkheads, shall be investigated and combustible material in contact with such metal, removed.

Flame or spark producing apparatus shall not be used on or near containers of flammable liquids or compressed gases.

Apparatus shall not be left alight when unattended.

An adequate number of appropriate fire fighting appliances shall be placed readily to hand until all possibility of an outbreak of fire has passed.

Jobs involving the use of flame or spark producing apparatus shall not start within one hour of the end of the working period.

The "Danger Area" shall be examined closely immediately after completion of work and after an interval between 30-60 minutes, to ensure that there is no smouldering or incipient fire.

Note: The "Danger Area" may extend to cavities, voids, rooms cupboards, ducts of other concealed spaces where despite precautions, flame, hot sparks or conducted heat may have penetrated.

## **65. Machinery**

Internal combustion engines shall be sited only in well ventilated positions, with exhausts well clear of combustible materials.

Machinery likely to exude oil shall be so arranged as to avoid soaking any combustible material or contaminating land/drainage.

## **66. Temporary Electricity Supply**

Temporary electrical services shall be in accordance with BSCP 7375 "Distribution of Electricity on Construction or Building Sites". Cables shall be carefully routed and protected to avoid damage and shall be maintained in good condition.

## **67. Radio Frequency (RF) Hazard (RADHAZ)**

Contractors intending to undertake work aloft on vessels or other areas or structures where RF hazards may exist, should have completed the Babcock RF course. Advice should be sort from the TR.

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## 68. Working on Vessels

Any Sub-Contractor working on board a vessel shall obtain a vessel specific safety brief from the relevant Project Team (for vessels in Upkeep/under construction) or the Officer of the Day (RN vessels in Fleet Time) before starting work.

Sub-Contractors are also required to keep themselves updated on activities on the vessel under RN control by checking the Ship Hazard Board located at the brow.

## 69. Work on MoD Buildings or Property

For work being undertaken on MoD buildings or property additional arrangements would apply, with particular regard to reporting of accidents, suspect materials, competency and liaison with MoD Building Controllers. The Technical Representative will provide details of the particular requirements for the activity.

## 70. Use of Radio Based Equipment

Due to the nature of the site at Devonport Royal Dockyard, both the MoD and the Office of Communications (Ofcom) strictly control the use of radio frequencies. Consequently the use of all radio based equipment by contractors/subcontractors on the Devonport Royal Dockyard site needs to be approved for use. Details of licences or samples of equipment must be supplied to the TR a minimum of 14 days' notice to obtain approval for use.

## 71. Communication of Safety Issues

Babcock currently operates Time Out for Safety (TOFS). TOFS normally take place between 11:00 and 11:30 on Mondays or the first working day of each week. The aim of TOFS is to provide the opportunity for the manager and their work teams to discuss current safety issues in the workplace. Babcock requires that Sub-Contractors and their employees are actively involved in these sessions, by exception and with the consent of the TR contractors may operate outside TOFS provided they can demonstrate they operate an equally effective system with their employees and sub-contractors. Material for TOFS briefs can be provided by the TR.

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