



Aquatic Control Engineering

Occupational Health and Safety, Environmental and Quality Manual

December 2022; Version 8

Issued to all Aquatic Control Engineering employees

Date Reviewed: 12/12/2023

Next Scheduled Review: 12/12/2024

REVISION AND AMENDMENT REGISTER

DATE	PAGE NUMBER	REVISION DETAILS	ISSUE NUMBER
29 th October 2021		Integrated Manual to include Environmental ISO 14001 factors	
December 2022		Updated section 8 to include Design Management Policy and Process updates	

CONTENTS

This table of contents for the Integrated Manual of Health and Safety, Environmental and Quality Manual is built by the ISO 9001: 2015, ISO 45001: 2018, ISO 14001:2015 references

	Foreword
	ACE Company Profile
	ACE Company Vision
	Occupational Health and Safety, Environmental and Quality Manual Statement
	HSEQ Management Structure
1	Scope
2	Normative references
3	Terms and definitions
4	Context of Aquatic Control Engineering
4.1	Understanding ACE and its context
4.2	Understanding the needs and expectations of workers and other interested parties
4.3	Determining the scope of the Management System
4.4	Management System and its processes
5	Leadership
5.1	Leadership and commitment
5.2	Customer Focus
5.3	Policy – Establishing & Communicating the policies
5.4	Organisational roles, responsibilities and authorities
5.5	Consultation & participation of workers
6	Planning
6.1	Actions to address risks and opportunities
6.2	Hazard identification and assessment of risks and opportunities (Health & Safety)
6.3	Compliance – legal and other requirements
6.4	Objectives and planning to achieve them
6.5	Planning of changes
7	Support
7.1	Resources
7.2	People
7.3	Infrastructure
7.4	Monitoring and measuring resources
7.5	Competency & Awareness & Organisational Knowledge
7.6	Communication (Internal & External)
7.7	Documented Information
7.8	Creating and updating Documented Information
7.9	Control of Documented Information

8	Operation
8.1	Operational planning and control
8.2	Emergency preparedness and response
8.3	Requirements for products and services – customer communication
8.4	Determining and reviewing requirements for products and services
8.5	Changes to requirements for products and services
8.6	Design and Development of products and services
8.7	Control of externally provided products and services
8.8	Information for external providers
8.9	Production and Service Provision
8.10	Property belonging to customers and external providers
8.11	Preservation
8.12	Post-delivery activities
8.13	Control of changes
8.14	Release of services and products
8.15	Control of non-conforming outputs
8.16	Management of Change
9	Performance evaluation
9.1	Monitoring, Measurement, Analysis and Performance Evaluation
9.2	Customer Satisfaction
9.3	Analysis & Evaluation Compliance
9.4	Internal Audit
9.5	Management Review
10	Improvement
10.1	Non-conformity and corrective action
10.2	Continual improvement

FOREWORD

This integrated Occupational Health and Safety, Environmental and Quality (HSEQ) Manual is the means by which Aquatic Control Engineering Limited (the 'Organisation') satisfies the requirements of its customers, particularly with regard to management responsibility.

The Organisation is obliged to ensure that its Quality Policy and Occupational Health and Safety Policy and Environmental & Sustainability Policy is fully and completely understood by its employees, and that its procedures are implemented and maintained at all times.

This Integrated Manual is in accordance with the requirements of **BS EN ISO 9001 : 2015, BS EN 45001 : 2018 and BS EN 14001: 2015**. All of the components of the Quality and Occupational Health and Safety Management System shall be periodically and systematically reviewed by both internal and external auditing procedures.

The Managing Director, Quality & Environmental Compliance Manager and Operations, Health and Safety Manager, appointed by the Organisation's Joint Chairman, are responsible for the control of all matters relating to the implementation of these procedures.

The assurance of Occupational Health and Safety, Quality and Environmental factors is fundamental to all the work undertaken by the Organisation. All ACE employees at every level in the Organisation's structure shall practice the procedures established.

The integrated management system ensures input from interested parties and all ACE employees are considered in planning, change and decision making throughout the business.

The potential benefits to the Organisation of implementing this Integrated HSEQ Management System are:

- 1. Ensure adherence to industry standards and statutory regulations and maintain a continuous strategy to improve and promote best practice for all**
- 2. Ensure a safe working environment for all by acting to minimise risk, tackle issues and promote an ethos of safety first**
- 3. Implement systems to mitigate risk of harm and injury through a process of recording, monitoring, review and taking action when necessary**
- 4. Manage Occupational Health and Safety risks and improve health and safety performance of Aquatic Control Engineering**
- 5. Assist Aquatic Control Engineering in fulfilling its health and safety and all HSEQ legal obligations whilst adhering to legislative business requirements.**
- 6. The ability to consistently provide products and services that meet customer and applicable statutory and regulatory requirements**
- 7. Facilitating opportunities to enhance customer satisfaction**

8. Addressing risks and opportunities associated with its context and objectives and interested parties
9. The ability to demonstrate conformity to specified Quality, Environmental and Health & Safety Management System requirements.
10. Implement systems to enable ACE to protect the Environment by preventing or mitigating adverse Environmental Impacts
11. To review and monitor environmental aspects, in line with ACE's Sustainability Commitment towards Carbon Reduction

ACE COMPANY PROFILE

ACE Company Profile

Aquatic Control Engineering offer consultation, design, manufacture, supply, project management, installation and commissioning of:

- ✓ High-quality, low-maintenance water level control equipment for various applications, such as land drainage, flood alleviation/prevention, water control for conservation and control for water process and treatment. Including flap valves, inline non-return valves, penstocks, stop-logs, tilting weirs, weir penstocks, auto feed sluices, windmill water pumps, Archimedean screw pumps, axial pumps and weed-screen cleaners.
- ✓ Specialist fish migration solutions including fish deterrent and fish passage systems such as tidal/flood protection systems along with inland bypass systems to deal with obstacles and level changes such as posed by pumping stations, power stations and weirs.
- ✓ Waterway maintenance machinery including tree-cutters, weed-boat/harvesters, flailing weed cutters and PTO driven pumps.

ACE represent European Manufacturers and design and manufacture, both water flow control equipment fish and eel passes in house.

ACE is accredited with ISO 9001, Quality, ISO 14001, Environmental and ISO 45001 Occupational Health and Safety, which all management systems in place. ACE are also qualified and registered with Achilles Verify UVDB category B2, scoring 100%.

ACE are specialised Contractors to the below Organisations (Tier 1 contractors / Framework contractors)

Our Core Customers:

Environment Agency (inc Framework contractors)
Canal and River Trust
Waterways Ireland
Internal Drainage Boards
Councils
Nature Conservation Organisations
Water Companies including sewage treatment plants
Power Generation (renewable and traditional)

ACE is registered on Constructionline (registration number 177420) Builders Profile and the Achilles Utilities Vendor Data Base (supplier number 061890)

ACE COMPANY VISION – WHY WE DO WHAT WE DO

Aquatic Control Engineering believe in a future of delivering truly sustainable water management solutions.

Sustainability is about providing a balanced social, environmental and economic solution to a problem.

Protecting properties and water supplies whilst maintaining value for public services through:

TOTEX SOLUTIONS looking at whole life cost

Delivering quality reliable assets

Working together with our partners, customers and stakeholders to ensure sustainable outcomes from our asset delivery

Ensuring minimal negative impact to the environment

Supply products which maintain flood defences and water supplies such as Penstocks, land drainage pumps, non-return valves and water way machinery.

Supply products which reduce the environmental impact

Supply Fish Friendly pumps, eel passages, fish flap valve's, wind pumps whilst using materials which have a reduced environmental footprint

Provide solutions using our product portfolio which require minimal maintenance

Maximise longevity with low ongoing costs and ensure cost effective solutions within water management

Quality project management and specialist knowledge of our sector to ensure a first-time right approach

Smart Design building from experience, incorporating the principles above alongside our business values

We will achieve this working through our INSPIRES Core Values. Innovation, nature, Safety Passion, Integrity, Respect, Empowerment, Sustainability.

Signed:



Stephen Randall; Managing Director

Occupational Health and Safety, Environmental and Quality Policy Statement

Aquatic Control Engineering aims to provide a future of delivering truly sustainable water management solutions, both on time, within budget and, as far as it is reasonably practicable, to ensure the health, safety and wellbeing and safe working environment in accordance with the Health and Safety at Work Act 1974, complying to the ISO 9001 Quality system and ISO 45001 Occupational Health and Safety system and ISO 14001 Environmental system.

The Integrated HSEQ Management System ensures that the products and services provided to clients consistently meet, or exceed their expectations whilst ensuring the highest level of control and minimisation of adverse environmental and health and safety aspects. The integrated HSEQ management system ensures input from interested parties and all ACE employees are considered in planning, change and decision making throughout the business.

Aquatic Control Engineering operates a risk-based system that evaluates its interested parties needs, risk and opportunities, and has set quantifiable goals with plans in place, to ensure review and continual improvement.

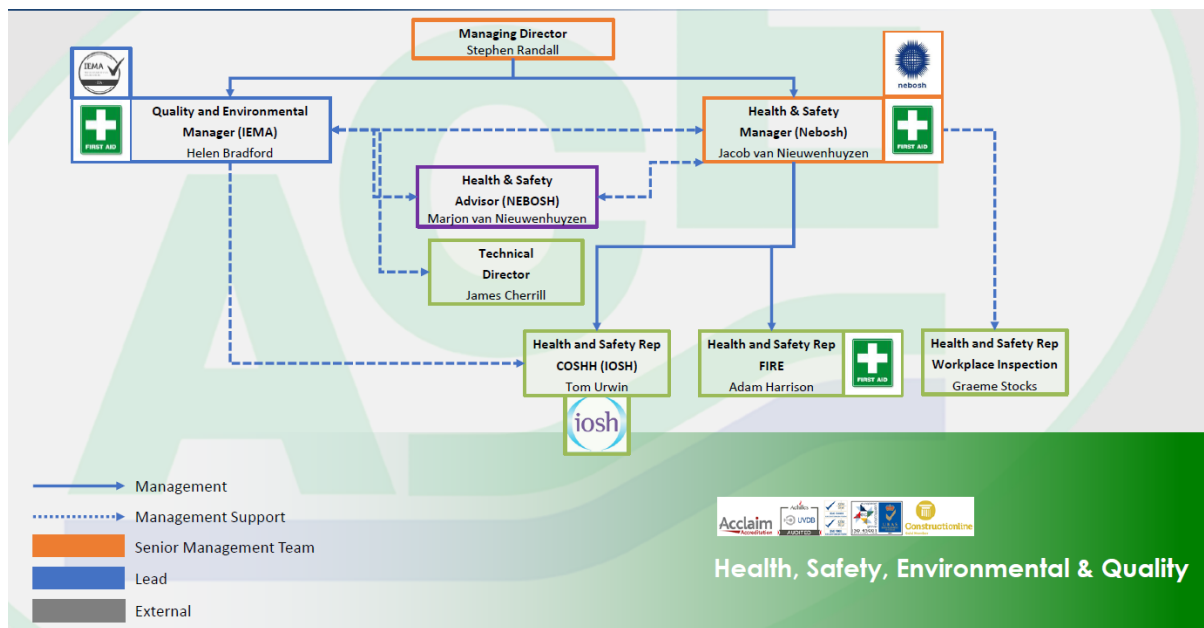
The Occupational Health and Safety Policy, Environmental and Sustainability Policy and the Quality Policy along with their relating procedures, are in place to ensure that the overall organisational goals of the company are met.

The organisational goals are outlined within the ACE Company Vision and achieved via the INSPIRES core company values.

It is the responsibility of the senior management team to drive improvement in the effectiveness of the Integrated HSEQ Management System.

HSEQ Structure

The companies HSEQ structure is outlined within the HSEQ HR Organisation Structure and specific roles and responsibilities within employee job descriptions.



1 - SCOPE

The scope of the organisation's integrated management system for HSEQ, applies to all aspects of the company's operations as shown within the Company Profile, ISO 9001 Quality and ISO 45001 OH&S and ISO 14001 Environmental certification.

This scope enables the organisation to provide safe and healthy workplaces by preventing work related injury and ill health, as well as by proactively improving the overall Quality, OH&S and Environmental performance across all areas as defined, within this integrated manual.

The defined scope of certification is: **the consultation, design, manufacture, supply, project management, installation and commissioning of water level control equipment, fish migration solutions and waterway maintenance machinery.**

In line with the Internal Standards of Occupational Health and Safety, Quality and Environmental, the intended outcomes of these policies demonstrate the following:

1. Ability to consistently provide products and services that meet customer and applicable statutory and regulatory requirements
2. Ability to determine both the external and internal contexts in which it operates and shall monitor and review the issues which arise
3. Aims to identify the needs and expectations of interested parties
4. Aims to enhance customer satisfaction through the effective application of the Quality Management System, including processes for improvement of the System and the assurance of conformity to customer and applicable statutory and regulatory requirements.
5. Continual improvement of Quality and Occupational Health and Safety performance
6. Enhancement of environmental performance
7. Fulfilment of legal requirements and other requirements
8. Achievement of Quality and Occupational Health and Safety objectives and key performance indicators

The scope is determined in line with the contexts of the organisation; internal and external factors and understanding the needs and expectations of interested parties; combined HSEQ documentation.

Whenever any requirement(s) of this International Standard cannot be applied they are deemed to be not applicable. The rationale for all such exclusions is clearly set out in this Integrated Manual.

Such inapplicability's do not affect the Organisation's ability, or responsibility, to provide products and services that meet customer and applicable statutory and regulatory requirements.

2 - NORMATIVE REFERENCES

3 - TERMS AND DEFINITIONS

The Quality, Occupational Health and Safety integrated manual has been prepared and applied in line with both ISO 9001: 2015 and ISO 45001: 2018.

Specific fundamentals and vocabulary relating are set out in the following document:

ISO 9001: 2015, Quality Management Systems – Fundamentals and Vocabulary.

The International Organisation for Standardisation (ISO) has defined specific terms and definitions for use within Quality and Occupational Health and Safety. These terms and definitions can be found online or within the Appendices.

There are no specific normative references within the Environmental ISO 14001 standard.

4 - CONTEXT OF THE ORGANISATION

4.1	Understanding ACE and its context – Internal and External
	STATEMENT/PROCEDURE
1.	<p>ACE's Context of the Organisation reviews all Health and Safety, Environmental and Quality aspects in line with ISO 9001, 14001 and ISO 45001 (See Separate Part 1-5 HSEQ Contexts of the Organisation document and specific Internal and External Factors of Health and Safety)</p> <p>The Organisation's external context has been evaluated and documented in order to achieve the intended outcomes of the Management system, taking into account such factors as:</p> <ol style="list-style-type: none"> 1. The social and cultural environment 2. The political environment 3. The legal and regulatory environment 4. The market environment 5. The technological environment 6. The economic environment 7. The natural environment 8. The competitive environment 9. The geographical scope of each environment 10. Key drivers and trends.
2.	<p>The Organisation's internal context has been evaluated and documented in order to achieve the intended outcomes of the management system, taking into account such factors as:</p> <ul style="list-style-type: none"> • Governance • Organisational structure, roles and accountabilities • Policies, objectives and the strategies that are in place to achieve them • Information systems, information flows and decision-making processes • Organisational culture • Standards, guidelines and models • Contractual relationships • Management's commitment to Health and Safety and Wellbeing • Health and Safety Budget, Health and Safety Culture • Training and Competence of ACE employees • Supervision • Compliance • Near miss and accident reports • Generic and site specific risk assessments and method statements • Hazard identification • Inspections

	<ul style="list-style-type: none"> Internal audits
3.	The external and internal context is reviewed at least annually and the HSEQ Contexts of the Organisation documentation updated accordingly by the Managing Director (HSEQ Lead).
4.	<p>Selected Internal and External contexts are identified and managed through the following organisations, registrations and memberships:</p> <ul style="list-style-type: none"> Constructionline registration Achilles Verify registration Builders Profile registration The Environment Agency IEMA membership Sustainability Supply Chain School Pump Centre membership Association of Drainage Authorities membership The Institute of Fisheries Management membership RSPB Nottinghamshire Wildlife Trust membership UKCA Marking Association membership

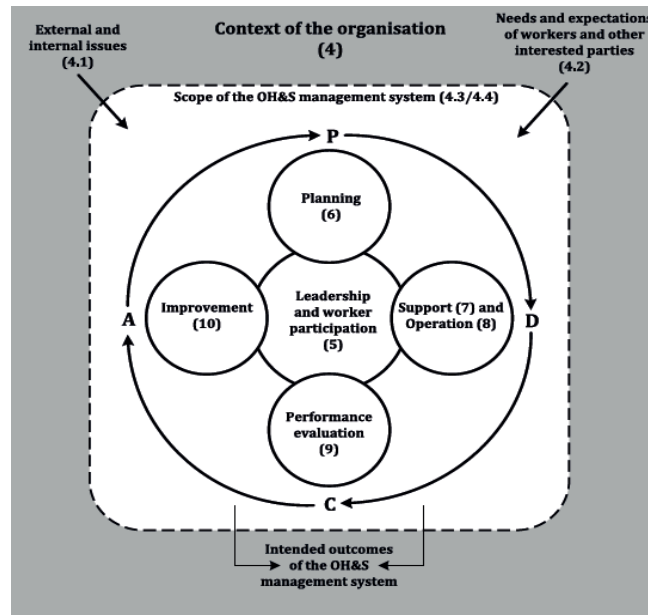
4.2	Understanding the needs and expectations of workers and other interested parties
	STATEMENT/PROCEDURE
1.	<p>The interested parties that are relevant to the Management System are shown on the HSEQ Context of the Organisation document and can be defined as:</p> <ol style="list-style-type: none"> Company owners and Directors ACE Employees Health and Safety Executive Principal Contractors Sub-Contractors Suppliers Customers / End Customers The public and local community External Audit Parties Industry bodies Statutory and Regulatory Bodies
2.	<p>The significant requirements of these interested parties include:</p> <ol style="list-style-type: none"> Supply Chain Management A safe and pleasant working environment Adherence to legal and regulatory requirements Ensuring competency of external parties

3.	<p>The Health and Safety Manager understands the needs of interested parties specifically relating to Occupational Health and Safety, and ensures the management of the system through active participation and involvement by the process of:</p> <ul style="list-style-type: none"> • hazard identification, risk assessments and determination of controls – Ref H & S Policy • incident investigation • the development and review of OH&S policies and objectives • consultation where there are any changes that affect their OH&S management system • consultation with designers where OH&S risk can be reduced/avoided • representation on OH&S matters • employees are informed about their participation including who is their representative(s) on OH&S matters. (e.g. notice boards, Toolbox Talks, RAMS, memos etc) • adequate and appropriate consultation with sub contractors where there are changes that affect their OH&S practices • adequate and appropriate consultation with external and interested parties where there are changes that affect their OH&S practices
----	---

4.3	Determining the scope of the Management System
	STATEMENT/PROCEDURE
1.	<p>Taking into account the output from Sections 4.1 (the contexts of the organisation) and 4.2 (understanding the needs of workers and interested parties) above, along with the products and services offered by the Organisation, management ensures that this Integrated Manual includes:</p> <ol style="list-style-type: none"> 1. The defined scope of the Management System with any non-applicable clauses identified and justified 2. HSEQ Statement and commitment 3. Documented procedures or reference to them within other documents (Intranet system) 4. A description of the interaction of processes. 5. Control of company documents procedure 6. Legislative requirements as documents within the HSEQ Legislation log
2.	<p>Effective implementation of the Integrated Management System is monitored on an informal basis, as part of the Organisation's day-to-day operations, planned inspections, internal audits and reporting procedures.</p> <p>HSEQ elements are reviewed on an annual basis, formally addressing separately the Quality and Health and Safety Report and Plan for the business activities and periodically reviewed in quarterly management reviews.</p>

	The Environmental and Sustainability Commitment is reviewed and monitored Quarterly alongside the Policy and Arrangements annually.
3.	<p>The OH&S Policy is determined by the Health, Safety and Wellbeing of all ACE employees, our Sub Contractors and other interested parties that enter facilities where ACE has the prevailing influence, and this is the prime purpose of this system. We take a view that:</p> <ul style="list-style-type: none"> • All incidents are preventable • Zero tolerance where safety risks are taken • Occupational health and safety is a senior management responsibility • All ACE employees have a duty of care and can stop any task should they deem it unsafe <p>Our objective is to ensure that through the OH&S policy and associated procedures, all business operations are carried out safely with zero harm, injury and risk to health. To also eliminate damage to equipment and the environment.</p> <p>Where required the company's Disciplinary and Grievance Policy will be consulted in cases of non-compliance and breaches to the system outlined within this document.</p>

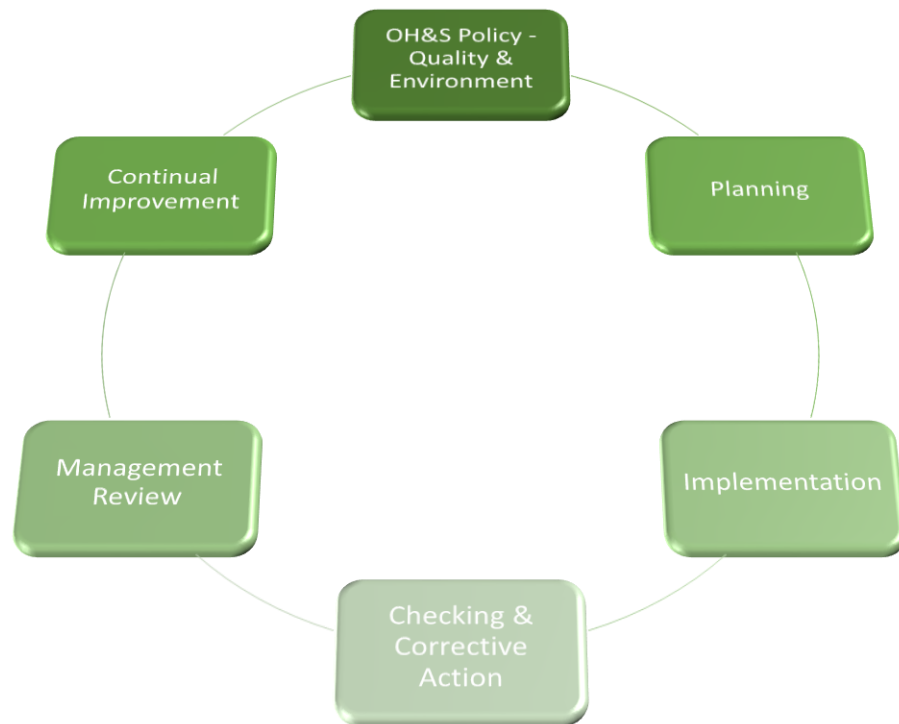
4.4	Management System and its processes
	STATEMENT/PROCEDURE
1.	<p>As part of the implementation of this Integrated Manual, ACE has identified and documented in this Manual:</p> <ol style="list-style-type: none"> 1. The Contexts of the Organisation and Interested Parties 2. The HSEQ Policy Statement 3. The processes needed for the specific HSEQ management system 4. The sequence and interaction of these processes 5. The criteria and methods used to ensure the effective operation and control of these processes, including responsibilities and authorities 6. The means to ensure the availability of the resources and the information necessary to support the operation, monitoring and continual improvement of these processes 7. The risks and opportunities as determined in accordance with the requirements of Section 6.1 (planning) 8. The processes used to measure where applicable, monitor and analyse these processes and implement action necessary to achieve planned results and monitor continual improvement with the requirements of section 8 of this manual.
2.	The HSEQ Management System is applied using the concept of Plan, Do, Check, Act (PDCA)



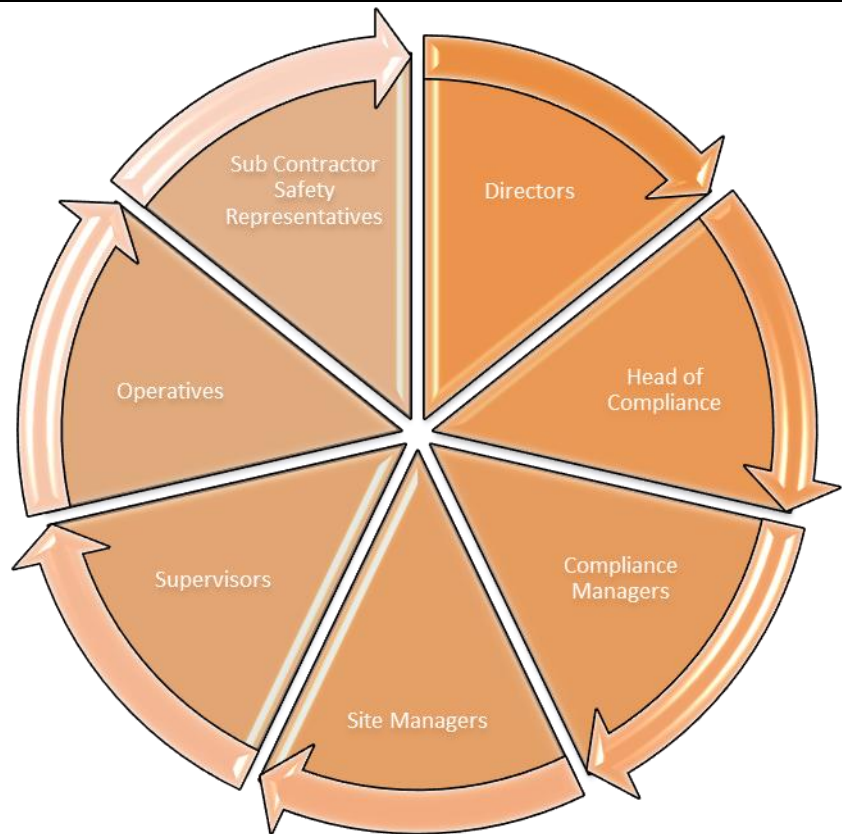
Note: Numbers in brackets refer to the clauses in the International Standard.

Compliance Cycle

The Operations process cycle will define the steps required to achieve compliance, and maintain standards. This cycle will complement the integrated management system binding together Quality, Environmental and Occupational Health and Safety.



ACE considers the Compliance Team to include every employee. Compliance led by the Managing Director, Quality & Environmental Compliance Manager and Occupational Health and Safety Manager. Each individual will play their part in ensuring the health & safety and wellbeing of themselves, and those around them, irrespective of position within the company.



Directors:	Managing Director & Healthy and Safety Manager
Head of Compliance:	Operations Health and Safety Manager
Compliance Managers:	Senior Management Team at Aquatic Control Engineering
Site Compliance:	Installation Manager
Supervisors and Operatives:	Installation Site Supervisor and Warehouse Supervisor
Sub-Contractors:	Person appointed by the Sub Contractor as responsible for communication compliance.

3. **KEY INTERNAL PROCESSES AS FOLLOWS:**
- SALES PROCESS**
- PROJECTS PROCESS**
- OPERATIONS PROCESS**

SALES PROCESS






EARLY WARNINGS

(to protect ACE and our Customers)

- Early Warnings must be issued for any issue that has potential programme or cost implications.
- Early Warnings must be copied to Head of Projects.
- Early Warnings to be closed out or have an agreed route for early warning 3 weeks. Address CE as Client / ACE agreement











	<div> <div> <div>Operations</div> <div> <div>General Works</div> <div>Project Works</div> <div>Health, Safety, Environment & Quality (HSEQ)</div> </div> </div> <div> <div>Operations Team</div> <div> <div>Warehouse</div> <div>Site Team</div> <div>Management</div> </div> </div> </div> <p>Specific Breakdown can be found within Procedures on the company Intranet Drive and operations team delivery site files</p> <p>The Warehouse duties also follow a Warehouse Goods Out procedure with specific Delivery Supplier information</p>
5.	As part of the Management Review process, the Organisation reviews the Integrated Manual and when required, makes changes in order to ensure that it continues to meet management requirements and market conditions.

5 - LEADERSHIP

5.1	Leadership and Commitment
	STATEMENT/PROCEDURE
1.	<p>All policies include a commitment from management to develop and improve the Quality, Occupational Health and Safety Management System and review Environmental and Sustainability factors by:</p> <ul style="list-style-type: none"> Communicating throughout the Organisation the importance of meeting all relevant statutory and regulatory requirements Establishing the Quality Policy and its Objectives Establishing the Environmental Aspects and Impacts with the Policy and arrangements Monitoring and reviewing of specific HSEQ factors outlined within KPI's Promoting improvement and ensuring correct training is available to all employees Conducting Management Reviews Ensuring the availability of resources Ensuring that all operations carried out by employees are safe, free from risk to health, environmental, personal injury and injury to others. Continual improvement of OH&S performance Fulfilment of legal requirements and other requirements Achievement of separate Quality KPIS and OH&S KPIS
2.	<p>Senior Management also commits to:</p> <ol style="list-style-type: none"> Promote the use of risk-based thinking Ensure that the HSEQ Management System performs as intended Support other relevant management roles with regard to their delegated responsibilities Reporting and recording providing opportunities for improvement Prioritising environmental focus
3.	<p>The Managing Director oversees the implementation of Health and Safety throughout the business, working with the Health and Safety Manager and Quality & Environmental Compliance Manager who is responsible for management, implementation and maintenance of this manual, and compliance to the ISO 45001, ISO 14001 and ISO 9001 standard.</p>

5.2	Customer Focus
	STATEMENT/PROCEDURE
1.	Customer focus is ensured by the implementation of the contract review processes set out in Section 8. (Determination of requirements for products and services).
2.	Feedback from customer monitoring as described in Section 9. of this Manual is reviewed during Management Review.
3.	The risks and opportunities that can affect conformity of products and services and the ability to enhance customer satisfaction are determined and addressed as part of Section 6.1. (Planning)

5.3	Policy – Establishing & Communicating the Policies
	STATEMENT/PROCEDURE
1.	The Organisation's HSEQ Policy Statement is documented in this Integrated Manual and fulfils the requirements summarised within the ISO 9001 and ISO 45001 requirements and standards.
2.	The Organisation's intranet drive holds relevant policies relating to the Quality, Occupational Health and Safety Management System also in line with the Environmental & Sustainability Policy & Arrangements.
3.	<p>In order to provide evidence of the organisation's commitment to the separate HSEQ Policies, they are regularly reviewed and any changes are approved by the Managing Director. These reviews and all approved changes are recorded in the minutes of the Quarterly Management Reviews.</p> <p>Copies of all policies are made available to all employees on day 1 induction and during PDR's and specific communications (toolbox talks, emails etc.)</p> <p>Copies of relevant specific policies, where considered relevant to do so, are made available to interested parties and in line with the HSEQ Contexts of the Organisation; internal and external factors.</p>

5.4	Organisations roles, responsibilities and authorities
	STATEMENT/PROCEDURE
1.	Responsibilities and authorities, together with the job titles of those responsible for communicating them throughout the Organisation, are shown on the HSEQ organigram.
2.	Additional to the HSEQ chart, a Health and Safety management organogram is included as part of the Occupational Health & Safety Policy.
	<i>Specific to the Quality Policy, Environmental and Sustainability Policy and responsibilities:</i>
	<p>The Managing Director has ultimate responsibility for the management system and ensures that, the Quality & Environmental Compliance Manager is responsible for:</p> <ol style="list-style-type: none"> 1. Ensuring that the Quality Policy and integrated management system, accurately reflects the requirements of the International Standard (ISO 9001) 2. Ensuring the Environmental and Sustainability policy and it's arrangements reflect the standard 3. Ensuring that all processes deliver their intended results 4. Providing reports on the performance of the Integrated Management System and reporting opportunities for improvement back to the Senior Management team; via the Quality KPIs and Environmental KPIs outlined 5. Prioritising customer focus 6. Evaluating and implementing planned changes to the HSEQ Management System.
	<i>Specific to Occupational Health and Safety:</i>
	<p>Occupational Health and Safety Manager:</p> <p>The Health and Safety Manager ensures that policies and procedures relating to OH&S and the integrated management system are implemented correctly and adhered to by all employees and sub-contractors. They will ensure that training is readily available and is suitable.</p> <p>The Health and Safety manager will ensure Health and Safety communication is produced, reviewed, audited and distributed accordingly. They will update policies where required and ensure objectives are met and improved. Regular communication with the work force on Health and Safety issues will be maintained.</p> <p>The principle responsibilities of Health and Safety Manager are:</p> <ul style="list-style-type: none"> • Ensuring safety of all operations relating to the company's activities at all times. • Ensure adequate resources with reference to ACE documented Management System requirements.

- Provide timely reporting to the company directors on OH&S performance both for review purposes and for implementation of improvements. (Health and Safety Plan and Report Annually, Quarterly management reviews)
- Working with both the quality and environmental leads to ensure conformance of all Integrated Management System activities with the requirements of ISO 9001:2008, ISO 14001:2004, ISO 45001:2018 and all relevant regulatory/legislative requirements pertaining to the company.
- Maintenance of the Manuals, Procedures, Risk Assessments, Method Statements, Objectives and Targets, the legislation log, Risks and Hazards and SSOW's
- Monitoring & Measuring of OH&S KPIs with the Managing Director
- Lead implementation and maintenance of the Integrated management system for Occupational Health and Safety, ensuring it is effective in its purpose of eliminating existent or potential Integrated Management System deficiencies.
- Promote awareness of the Integrated management system throughout the company and the need to satisfy customer needs and expectations at all times.
- As part of the HSEQ team ensure adequate communication with all company sources (e.g. noticeboards, one-to-one meetings, e-mails etc.) with reference to the effectiveness of the integrated management system, company objectives and targets and the continued satisfaction of the customer.
- Ensure that persons in the work place take responsibilities for all aspects of the companies OH&S, over which they can have control and in line with their legal duties.

HSEQ Team:

The HSEQ team will ensure Health and Safety updates are communicated directly to the ACE work force; policy updates are communicated. All Quality, Environment and Occupational Health and Safety concerns will be communicated directly to the HSEQ Lead (MD). The HSEQ team will work to maintain an integrated approach to management systems throughout the business.

It is the responsibility of the HSEQ team to: -

- Ensure ACE implement and maintain corrective & preventive actions that are effective in their purpose of eliminating existent or potential Integrated Management System deficiencies, reporting to the Managing Director on the effectiveness of the management system throughout.
- To ensure adequate communication with all ACE employees (e.g. noticeboards, one-to-one meetings, e-mails etc.) with reference to the effectiveness of the integrated management system, company core values and monitoring.
- The promotion of OH&S management system awareness throughout the company and the need to satisfy customer needs and expectations at all times.

- All policies and procedures are regularly reviewed, updated and issued to all employees in line with updates and/or changes to the requirements, including any legislative updates.

Directors and Managers:

Directors & Managers will:

- Take a leading responsibility for the Integrated Management System
- Appoint roles and responsibilities to ACE Employees
- Ensure that there is an effective compliance with policies that addresses the quality, health and safety and environmental requirements, and that these are fully implemented with respect to all matters within their control
- Review safety reports, correspondence and advice and respond accordingly
- Review the effectiveness of company policies and ensure corrective action is taken as needs are identified.
- Ensure sufficient resources are available to meet requirements.

Project Managers: Project Managers have safety responsibilities with respect to their individual projects. In particular they are responsible for ensuring that project activities are carried out in accordance with ACE safety procedures and safety plans where applicable. They are also responsible for the liaison of safety matters with respective Subcontractor management where applicable. Project managers must also obtain relevant safety documents from the customer such as a Pre-Contract Information document or a Construction Phase Plan. Project managers must also ensure that a suitable Design Risk Assessment has been completed for any goods supplied by ACE.

Site Managers: Site Managers are responsible for ensuring that all project activities under their control are carried out in accordance with the requirements of relevant health and safety legislation and in accordance with the OH&S management system and safety method statements.

- Compile risk assessments & method statements (RAMS) as directed by ACE and in accordance with requirements, ensuring RAMS are read and understood by those working under them and works are carried out in accordance with produced and approved RAMS on all occasions.
- They are responsible for liaising with the Project Managers, and communicating with Supervisors, taking necessary actions to eliminate safety hazards or deficiencies in working practices.
- Ensure that all operatives are competent to carry out their respective tasks and that those required to operate plant and equipment have sufficient knowledge and training to enable the operation to be carried out safely.
- Ensure that safe systems of work are understood and implemented and that sufficient information, instruction and training is provided to all operatives under their control.

	<ul style="list-style-type: none"> • Ensure that all necessary forms and registers are maintained as required, and that all incidents that occur are fully investigated and reported. • Acquaint themselves with the hazards arising from the operations and convey these to the employees. • Be conversant at all times with the requirements of health and safety legislation, codes of practice and ACE policies and procedures. • Be familiar with emergency plans and take action as required in the event of an emergency situation. <p>Supervisors: Those responsible for the supervision and control of personnel shall ensure that all operations under their control are performed in accordance with the relevant safety plans and procedures (RAMS). Their responsibilities include:</p> <ul style="list-style-type: none"> • Ensuring that all employees under their control are competent and have the necessary knowledges, skills to work safely and have read and understood adhere to the RAMS/SSOW. • Ensuring that any deficiencies in equipment, standards and operating procedures within their control are corrected. • Ensuring that all incidents involving injury, damage to property or the environment, including near miss incidents, are thoroughly investigated to identify their causes, prevent recurrence and initiating effective follow up action. • Promoting and maintaining a high degree of safety awareness amongst all. <p>Safety Representatives: Safety Representatives will be appointed by any sub-contractors working on behalf of ACE, and or employed for any specific task/project. ACE will provide each safety representative with information and/or training to enable them to play an active role in promoting health and safety at work on any given task.</p> <p>Each safety representative will be expected to consult with the Health and Safety lead applicable at ACE on all health and safety matters. Safety representatives will be expected to assist in the investigation of potential hazards and dangerous occurrences on site, examine the causes of accidents and investigate complaints by any employee he represents relating to that employee's health, safety or welfare at work.</p> <p>Safety representatives may attend project specific meetings, site inspections and safety audits.</p> <p>Sub-Contractors will be made aware of this opportunity and be encouraged to attend.</p> <p>Employees:</p> <p>All ACE Employees: full time, part time or sub-contracted employees are responsible their own safety, and those around them irrespective of their position in the company by:</p> <ul style="list-style-type: none"> • Working in line with OH&S Management system, policies, procedures and Risk Assessments • Be familiar with and conform to the compliance of all other company policies at all times.
--	--

	<ul style="list-style-type: none"> • Ensure use of suitable safety equipment and use necessary devices at all times including when relevant applicable PPE in line with issued Risk Assessments and Method Statements • At all times following the instructions given by Supervisors, Managers and Project Managers and all others with responsibility for health and safety • Leaving the workplace or temporary works in a safe condition • Reporting all incidents and communicating suggestions to improve health and safety within ACE irrespective of position within the company
5.5	Consultation and Participation of Workers
	STATEMENT/PROCEDURE
1.	All ACE Employees follow the, Induction training program in line with the Personal Development Review (PDR) process to ensure development, planning, implementation, performance evaluation and actions for improvement are achieved in line with Quality, Occupational Health and Safety and Environmental.
2.	<p>The Health & Safety Manager facilitates and ensures the active participation / involvement in:</p> <ul style="list-style-type: none"> • hazard identification, risk assessments and determination of controls (SSOW) • accident, incident investigation, reporting and mitigation • the development and review of OH&S policies and objectives • consultation where there are any changes that affect their OH&S management system • representation on OH&S matters • employees are informed about their participation arrangements including who is their representative(s) on OH&S matters. (e.g. notice boards, Toolbox Talks, RAMS, memos etc) • there is adequate and appropriate consultation with contractors where there are changes that affect their OH&S
3.	The company has a Health and Safety Committee with representatives from across the business, ensuring identification of risks and hazards across all operations. Minutes are distributed and actions given to all on a bi monthly or quarterly basis.
4.	The Health and Safety Manager outlines any specific training requirements with the HR representative, in line with their specific job role requirements. This is maintained and kept up to date using the Training Competency Matrix.
5.	All ACE employees are involved in quality procedures relating to customer satisfaction, complaints and non-conformances.
6.	ACE also engages with its employees on health, safety, environmental and quality matters via tool box talks and Inspires Values presentation where two way communication is encouraged.

6 - PLANNING

6.1	Actions to address risks and opportunities
	STATEMENT/PROCEDURE
1.	<p>When planning for the Quality, Occupational Health and Safety management system, ACE have taken into consideration specific contexts of the organisation; internal and external factors and these are reviewed as part of the Management review process; monthly management reviews and quarterly minutes of the management meetings under the following headings:</p> <p><i>Changes in the internal and external issues that could affect the management system</i></p> <p><i>Risk & Opportunities</i></p> <p>A specific Health and Safety committee meeting is also held quarterly, and inspections, reporting and recording of specific H&S items are reviewed bi monthly, including specific sections relating to risks and hazard identification.</p> <p>The HSEQ KPIs are maintained and reviewed in line with the internal and external factors, interested parties to ACE and the scope and purpose of the Integrated management system.</p>
2.	<p>OH&S is a management responsibility and the Integrated management system has been designed such that it is an integral part of ACE's business activities.</p> <p>The Operations Manager / Health and Safety Manager, oversees and is responsible for the Health and Safety activity across the business, reporting to the Managing Director.</p> <p>Responsibilities are defined in the HSEQ Organisation structure and section 5. Leadership & Organisational, Roles and Responsibilities as detailed in this document. The nominated employees have been delegated the necessary authority to carry out their responsibilities and given specific training to their role relating to risk management.</p>
3.	<p>Processes that are necessary to facilitate the service provided, are determined, planned and implemented in accordance with the relevant procedures described in Section 8 of this Integrated Manual. The effectiveness of the documented procedures is subject to regular Management Review and revisions/improvements are made as necessary.</p>
4.	<p>The Managing Director ensures that wherever risk and opportunities are identified, they are recorded and reviewing on severity and treatment on the ACE Risk Register and then implemented with specific risk assessments based on the nature of our operations.</p>

	<div> <div>ACE Business Risk Categorisation</div> <div> <div>RISKS</div> <div> <div>STRATEGIC</div> <div> Economic Climate Financial Climate Brexit Industry Activity Social Responsibility Technology Organisational </div> </div> <div> <div>OPERATIONAL</div> <div> Commercial Environmental Financial Business Continuity Projects Sales Operations Supply Chain Human Resources Health & Safety Reputation Risks </div> </div> <div> <div>REPORTING</div> <div> Information Reporting Communications Knowledge Sharing </div> </div> <div> <div>COMPLIANCE</div> <div> Legislation Regulatory Industry Standards Registrations </div> </div> </div> </div>
6.1.2	Environmental Aspects and Impacts; activities, products and services
	STATEMENT/PROCEDURE
1.	<p>As part of the initiation of the Environmental Management System, an Environmental Review was carried out during which the Organisation’s Environmental Aspects were identified.</p> <p>Having identified the Organisation’s Environmental Aspects, those over which the Organisation can be expected to have control or influence have been identified and the significance of their Environmental Impacts has been assessed.</p> <p>Items included in this and subsequent Environmental Reviews include, but are not limited to:</p> <ol style="list-style-type: none"> 1. Legal requirements 2. Discharges to air, land and water 3. Potential COSHH and Health & Safety aspects of the materials used 4. Waste management 5. Working practices 6. Use of resources 7. Suppliers’ and sub-contractors’ environmental profiles. 8. Carbon Measurements and Targets 9. Product Design <p>As part of the Quarterly Management Reviews, the continuing significance of these Environmental Aspects is confirmed and taken into account whilst maintaining the Environmental Management System.</p> <p>See the Company Environmental Aspects and Impacts Log</p>

6.2	Hazard Identification and assessment of risks and opportunities
	STATEMENT/PROCEDURE
1.	ACE has a process to establish and maintain hazard identification; Hazard Identification and Risk Assessment procedure. The company also outlines identification of potential hazards and risk assessments and method statement in the Occupational Health and Safety Policy and is reviewed annually in line with legislation and context of the organisation.
2.	<p>HAZARD IDENTIFICATION, RISK ASSESSMENTS AND HAZARD CONTROL</p> <p>Risk Assessments of both normal and abnormal operational activity are a fundamental part of ensuring Health and Safety is maintained in the workplace, as required by the Management of Health & Safety at Work Regulations Act, and other regulations such as COSHH and Manual Handling Operation Regulations. A disciplined approach is expected throughout.</p> <p>Training is provided throughout the company to key personnel that will perform risk assessments within their roles, as either Directors, Managers, Project Managers and Installation Engineers to ensure that risk assessments are performed in accordance with the appropriate procedures. These key personnel will ensure that personnel working on any operation under their control are fully conversant with the risks associated with the work to be undertaken, hazards created in the vicinity of the workplace, human behaviour, capabilities and other human factors. Control measures will be implemented to minimise and, where possible, mitigate any risk associated with the work in hand.</p> <p>ACE operates and maintains a risk assessment library to immediately identify and flag any known risks with routine and non-routine working practices and activities, tools and equipment and environmental conditions. This library is expected to be used to assist in forming the basis, or as a partial addition to any complete risk assessment.</p> <p>Design risk assessments (DRA) are produced for all product groups, to design-out risk and ensure designs are safe for their intended use. Where sites have specific hazards that may differ from the standard intended use, Site Design Risk Assessments (SDRA) are also produced. These also provide information on further action that may be required by others (after ACE involvement is complete) to meet safety requirements (e.g. handrailing).</p> <p>Each and every operation will be assessed for risk and the necessary risk assessment will be produced, communicated, signed as read and understood by all personnel who have access to the workplace, including all company personnel, sub-contractors and visitors.</p> <p>This risk assessment library (intranet drive) is updated as new risks and hazards are identified, with risk mitigation procedures put into place.</p> <p>This process includes all equipment, activities, products identified as requiring assessment and control measures irrespective of the source, whether provided by ACE itself or any</p>

	<p>outside agent. They will be stored in hard copy or electronically for future reference and review.</p> <p>All project-based work requires a full risk assessment irrespective of size, cost or risk.</p> <p>Dynamic Risk Assessments are encouraged to be carried out by the supervisor or site manager of each project or task, providing further opportunity for hazard identification. All personnel are to be involved and consulted in the process of identifying hazards and mitigating risks to help maintain a proactive approach in working practices and improvements that could be implemented. Site Diaries are one way to approach this. Risk assessment and hazard identification issues and improvements are to be reviewed during the management review as a minimum, but as an ongoing living system a dynamic approach will be employed to roll out improvements with consultation of all ACE staff and any other party or person, directly or indirectly involved with the company as and when they are identified. Improvements can involve replacing a process, material or product which will help mitigate or eliminate risks. Identifying areas of the workplace where specific tasks are carried out and displaying signs and designating areas to specific tasks with adequate controls applied or issuing improved PPE for specific working practices as and when it may be identified.</p> <p>The hierarchical ethos is detailed below and is followed in the assessment of hazards and risks to all personnel of ACE Ltd, its sub-contractors, visitors and all other persons involved directly or indirectly with the company and its operations:</p> <ul style="list-style-type: none"> • Eliminate • Reduce • Isolate • Control • Personal Protective Equipment • Discipline <p>ACE maintains where we have identified specific risks within the scope of the company. These include the following Registers:</p> <ul style="list-style-type: none"> • Generic Risk Assessments Register • COSHH Risk Assessments Register • Workplace Risk Assessments including Office and Fire RA's • Risk Assessment Templates for design and project-based work <p>These are maintained in line with Control of Company Documents Policy found in the Company Intranet and Company Drive. They are made available to all employees, sub-contractors and visitors via the IT system where they have access to the current versions, or upon request.</p> <p>They are also made available to site personnel, sub-contractors and visitors via the site Safety Folders provided by ACE.</p>
--	--

3.	<p>ACE ensure the assessment of OH&S risks, other risks, OH&S opportunities and other opportunities to the OH&S management system is completed on a regular basis.</p> <p>Assessing risks is achieved by using the Hazard Identification and Risk Assessment procedure and specific Risk Assessment Method Statements for every job, this is then inputted on the Risk Assessment Register and a RAMS report is completed as a review.</p> <p>The business assesses risks using the open-door policy, PDR's for all employees, DSE risk assessments, medical and occupational health reviews, workplace risk assessment and generic risk assessments.</p>
4.	<p>OH&S opportunities are shown within Objectives and Targets that are identified in the company's Annual Health & Safety Report and Annual Health & Safety Plan. The Report is compiled by the Health and Safety Manager on an annual basis. The reports and annual plans are communicated to all ACE employees via email documents.</p> <p>The report will review key areas of the company activities, review of policies, identifying key risk operational areas including the commitments to the prevention of injury and ill health, compliance with applicable legal requirements, with other requirements to which the organization subscribes, and to continual improvement of the health and safety culture.</p> <p>The Plan will also consider its technological options, its financial, operational and business requirements, and the views of relevant interested parties.</p> <p>Improvements identified as a result of these reviews will be included in management meetings and reviews with implementation, the target. Significant improvements in day to day operations, equipment and materials will have immediate Risk Assessments, any hazard identification will be implemented as a priority.</p> <p>The Health and Safety committee meetings will also be a voice for any opportunities to improve the culture related to H&S and training requirements. ACE also find this enhances worker participation and within specific OH&S related toolbox talks.</p> <p>Externally ACE collaborate with specific site procedures and its customer and interested parties' requirements such as Anglian Water, the Environment Agency, BAM etc through online portals such as Constructionline, Builders Profile etc.</p>
6.3	Compliance – Legal and other requirements
	STATEMENT/PROCEDURE
1.	<p>ACE ensure that they remain informed of changing legislation, other requirements and working practices, in line with their products and services, materials and employee practices.</p> <p>Any uncertainties will be thoroughly investigated and recorded by appointment of their qualification and responsibility for example HSE through NEBOSH, Environmental through IEMA and HR through CPID etc.</p>

	<p>ACE will maintain a current legislation library and inform its employees of changes relative to any works that it regularly undertakes. This record can be found within the HSEQ Legislation Log that can be found within the Intranet drive for all to have access to.</p> <p>Updates to legislation will be identified by means of HSE updates from email sources and specific subscriptions relating to HSEQ topics, by proactive investigation via government statutory sources, and education, pre-qualification methods with suppliers and sub-contractors, review of best practice within the industry.</p> <p>Any changes are updated and reviewed on a quarterly basis during the management review, any updates are communicated to all employees.</p> <p>Any specific legislative requirements to business operations are recorded within the company policies and procedures.</p>
--	--

6.4	Objectives and planning to achieve them
	STATEMENT/PROCEDURE
1.	<p>KPIs are set in place for Quality, Environmental and Occupational Health and Safety indicators. The organisation's company aims are set out within the company vision and mission statement and all relevant functions, levels and processes needed for the integrated management system are defined by the Managing Director.</p>
2.	<p>Objectives and Targets are identified in the company's separate Quality & H&S Annual Report and Annual Plan and within the Environmental & Sustainability Policy and Arrangements combined with the Environmental Aspects and Impacts review.</p> <p>The reports and annual plans are communicated to all employees via email communications and are reflected in the intranet and company drive systems and the changes made are shown.</p> <p>The report will review key areas of the company activities, review of policies, identifying key risk operational areas including the commitments to the prevention of injury and ill health, compliance with applicable legal requirements, with other requirements to which the organisation subscribes, and to continual improvement.</p> <p>The plan will also consider its technological options, its financial, operational and business requirements, and the views of relevant interested parties.</p> <p>Improvements identified as a result of these reviews will be included in management meetings and reviews with implementation, the target. Significant improvements in day to day operations, equipment and materials will have immediate Risk Assessments, any hazard identification will be implemented as a priority.</p>

2.	Effective measurement of the defined Objectives is achieved by the application of all of the procedures described in Sections 9 and 10 of this Manual relating to performance management and analysing customer feedback and non-conformance issues.
3.	Effective review of the defined Objectives is an integral part of the Quality Policy review as required by the procedures described in Section 9 (Management review).

6.5	Planning of Changes
	STATEMENT/PROCEDURE
1.	Strategic implications to change will be led by the HSEQ Lead (Managing Director), the change of any items relating to Occupational Health and Safety will be reviewed and implemented by the Health and Safety Manager and the Quality Manager in line with compliance and Quality related items.
2.	Strategic implications to change specifically relating to the Environmental & Sustainability Policy arrangements will be reviewed by the Environmental Manager and monitored through the Environmental Aspects and Impacts log.
3.	Proposed changes are documented on specific Change Management Reports and, where necessary, circulated to relevant interested parties for comment. <ul style="list-style-type: none"> 1. The purpose of the changes and their potential consequences 2. Resource availability 3. Responsibilities and authorities
4.	Planning to ensure the elimination of risks and hazards are shown as part of Design Risk assessments, Construction Phase Plans, Risk Assessment Methods statements and are shown within the Hazard Identification and Assessment section above.

7 - SUPPORT

7.1	Resources
7.2	People
7.3	Infrastructure
	STATEMENT/PROCEDURE
1.	The identification of revised or additional resources required to implement and improve the processes of the Integrated Management System takes place as part of day-to-day management as well as part of the Management Review procedures described in Section 9.
2.	<p>The Organisation considers:</p> <ol style="list-style-type: none"> 1. The level of existing internal resources in terms of their capabilities and constraints 2. Resources which need to be obtained from external providers. 3. Training Competency requirements 4. Specific professional memberships such as NEBOSH, UKCA, CIPD and IEMA
3.	In addition to Management Reviews, regular informal meetings take place ensuring resources and planning is reviewed on a departmental and workload basis. Significant issues are discussed and appropriate action is agreed and implemented, as necessary.
4.	In line with Operational Planning and control, Measuring and Monitoring, the infrastructure of the company is reviewed on an ongoing basis with the application of the relevant procedures described.
5.	<p>Infrastructure such as company documents, buildings, maintenance, equipment, vehicles etc are all maintained by the Quality & Environmental Manager and Health and Safety Manager, utilising specific procedures to ensure reporting to the HSEQ Lead for business continuity planning.</p> <p>The inspections register maintains H&S related inspections (under PUWER, The Regulatory Reform (Fire Safety) Order 2005 & The Health and Safety (First-Aid) Regulations 1981) across the company relating to infrastructure (such as PAT testing, fire drills, first aid checks etc.)</p>

7.4	Monitoring and measure resources
	STATEMENT/PROCEDURE
1.	In order to ensure reliable and valid monitoring and measuring results the resources ACE use will be determined by the products and scope of services. In line with company documentation, appropriate information shall be maintained to demonstrate fitness for purpose on the monitoring and measurement resources.

	Specific monitoring is also completed in line with specific KPIs and environmental progress reviews.
2.	<p>Copies of specific calibration certificates are maintained on file under the Health and Safety Policy.</p> <p>A Calibration Log is maintained listing all calibrated instruments and recording their calibration status including such details as:</p> <ol style="list-style-type: none"> 1. Equipment description, type, manufacturer and model 2. Location - calibration requirements 3. Calibration interval with justification for the interval 4. Calibration procedure 5. Associated records.
5.	Any fault equipment is dealt with and recorded via the non-conformance reporting procedure.

7.5	Competency, Awareness and Organisational Knowledge
	STATEMENT/PROCEDURE
1	<p>In order to maintain and review performance of individuals in relation to their specific role / function with products or service, all employee competency is determined on their individual job description.</p> <p>All new ACE employees receive appropriate induction training during their probationary period. This includes an introduction to the specific policies and their individual role in the operation of the Quality, Occupational Health and Safety Management System and the achievement of relevant HSEQ Objectives, in addition to the implications of non-conformance. This is outlined within the Induction and PDR process and Training and Development policy.</p>
2	Employee training and competence are assessed taking into account each individual's education, skills and experience. A review of all training is completed on an annual basis with specific line management and HSEQ Leads.
3.	<p>Safety and competence</p> <p>ACE view it as a requirement that safety training is provided to all employees taking into account differing levels of responsibility, experience, ability, language skills and literacy and risk levels. All employees must attend a safety induction. In addition to this, employees may be required to attend specific courses or site based "toolbox talks" to ensure competency and understanding of any risks/hazards associated with the task relevant to operational requirement as appropriate. These training programs will be recorded in the Training Records and Project Files for individuals electronically on the IT system and where necessary in hard</p>

copy. Records will be collated and maintained by the HR and Quality representative; also in line with the Quality Management System.

It is the responsibility of the site managers, supervisors and installation team, to ensure that no person is permitted to use any item of work equipment or to carry out any type of risk activity unless appropriate training has been provided beforehand (as per PUWER regs). All activities with potential risk are fully detailed within specific risk assessments and reviewed before the task is commenced.

In addition to specific training measures, Risk Assessment Method Statements, and where required, Construction Phase plans are produced including environmental risk assessments.

All new employees must complete induction training on the day of their commencement of employment. All employees attending sites will complete a site specific induction before being permitted to enter any construction areas, this will include a declaration of understanding and commitment to comply with operational requirements.

Following the safety induction, the respective line manager, site manager or supervisor is responsible for providing additional job induction training specific to their location of work and job role. This induction also acts as an assessment to identify levels of skill of new employees.

A safety training record matrix is to be maintained relating to training, certificates and courses attended by all ACE employees. These will be retained in the ACE company drive system and will indicate maintenance of core competencies.

Any specific training requirements for specialist works from sub contractors, will be obtained for approval in advance of commencing works.

Competence of Compliance:

Managers, Project Managers, Site Managers and Supervisors shall be in possession of relevant professional qualifications and training specific to Occupational Health and Safety commitments.

Competency of Key Personnel: Procedures are in place to ensure that appropriate personnel are assigned to key roles.

As a minimum, employees must be made aware of:

- The importance of conformance with the OH&S policy & Environmental policy and Occupational Health & Safety / Environmental Management Systems requirements.
- Significant Environmental aspects of their activities.
- Significant H&S hazards of their activities
- Their role in achieving conformance with the H&SMS / EMS including any emergency preparedness and response requirements.
- The potential consequences of not complying with operating procedures, work instructions and guidelines.

For certain key roles or tasks, which can or may cause a significant Environmental impact and / or OH&S risks, criteria is established for measuring the competence of individuals performing those tasks (for example officially recognised training courses) – These may include Fire Marshall's, First Aiders, H&S & Environmental Risk Assessors. The

	<p>documentation used to record the above is the Training Competency Schedule and Company Training Matrix.</p> <p>Points that are to be covered in assessing competence:</p> <ul style="list-style-type: none"> • The training needs for all employees at each relevant function and level. • The appropriate training to cover requirements identified, has been given, particularly in hazard identification and / or environmental aspect and risk assessment. • Training given is adequate and complete, particularly for emergency preparedness and response including that required by any external contractors used. • Appraisals are made as to the competence of employees carrying out key tasks. • Training Records are maintained up-to-date showing training received. • Training and awareness for sub-contractors, temporary workers or visitors to the level of the risk to which they are exposed <p>Employees are to be selected by use of relevant principles defined above. Where required skills are not available then these are either recruited externally or training programmes are instigated to develop the necessary skills of employees.</p> <p>Staff Planning</p> <p>All key personnel will be ACE employees supplemented by experienced known contract personnel at peak periods, or appointed, competent Sub Contractor personnel.</p> <p>Site employees of a specific experience are generally employed directly by ACE.</p> <p>Subcontractor companies employed on ACE sub-contracts are required as a condition of contract to recruit competent, trained and experienced personnel, following the vetting procedure.</p>
4.	<p>See Training Competency Schedule of all ACE employees</p> <p>For specific sub-contractors, see separate folders with training competencies.</p>
6.	<p>In line with the ISO 9001 and ISO 45001 standards and this Integrated manual, ACE ensures all workers are made aware of the specific Quality Policy & Occupational Health and Safety Policies and their procedures to ensure they also understand their contribution to the effectiveness of the integrated management system.</p> <p>Communications of awareness can be via emails and toolbox talks, lunch and learns also show employees their contribution to adhering to Dare to be Aware accident reporting procedures, non-conformance reporting procedures and how this will impact the Q,OH&S management system.</p>

7.6	Communication (Internal & external)
	STATEMENT/PROCEDURE
1	<p>The effectiveness of the HSEQ Management System is communicated throughout ACE by providing copies of minutes of H&S committee meetings, senior quarterly management team minutes, regular internal meetings to address risks and opportunities, HSEQ KPI reports and reviews, specific Quality and Health & Safety Plans and Reports, Environmental reporting, monitoring and reviewing, toolbox talks, training and via investigations reports and notice board documented information.</p> <p>The integrated management system shows the Quality Communications procedure, which is issued to all using the Company Intranet drive.</p>
2.	Internal and External communications are recorded in line with the Quality Management System Communications folder.
3.	Legal and other requirements for the documentation of specific OH&S communications such as HSE advice or assurance certification, insurances, and awards are all documented using the Quality Communications file and minutes of meetings.

7.7	Documented Information
	STATEMENT/PROCEDURE
1.	<p>MANAGEMENT SYSTEM DOCUMENTATION</p> <p>The HSEQ Management System has been designed to complement ISO 9001, ISO 14001 and ISO 45001</p> <p>The Quality & Environmental Manager alongside the Health and Safety Manager is responsible for the approval and issue of the documentation system and ensures that: -</p> <ul style="list-style-type: none"> • Only current issues are available at approved locations within the areas identified within the Control of Company Documents Policy. • All obsolete documents are withdrawn and archived promptly and not used. <p>The Intranet document register, contains all master copies of current ACE/company documentation referenced in the Integrated Manual, Policies and Procedures.</p> <p>Any document changes or modifications that need to be actioned outside this procedure due to urgent requirement shall be countersigned by the Managing Director or the Quality Manager.</p> <p>The integrated management system documentation is comprised of:</p> <ul style="list-style-type: none"> • Specific Company Policies • A series of company procedures • Document control Procedures • Generic and specific risk assessments

	<ul style="list-style-type: none"> • Safety plans and Emergency Plans (Generic and project specific) • Incident reports • Relevant statistical data • Minutes of meetings, specifically the regular meetings relating to health, safety and environmental matters and compliance reviews • Annual Quality, Health & Safety and environmental Plans and Report • ACE Commitment to Sustainability and Carbon Management • ACE Waste Management Strategy • All other documents detailed within the Intranet file register
--	---

7.8	Creating and Updating Documented information
	STATEMENT/PROCEDURE
1.	In line with the ISO 9001 new documentation templates are provided by the Quality Manager using the Control of Company documents procedure and Intranet file with templates provided.
2.	Where necessary documents are approved at an appropriate level before release from the organisation.
3.	<p>All created and updated documented information includes the following:</p> <ol style="list-style-type: none"> 1. Title 2. Date 3. Author 4. Reference number (project related) 5. Version number

7.9	Control of documented information
	STATEMENT/PROCEDURE
1.	<p>Control of documented information is shown within the Control of Company Documents Policy with the Managing Director approving all management systems and this HSEQ Manual in line with ISO 9001, ISO 14001 and 45001.</p> <p>Current versions are maintained in electronic format on local intranet within the controlled area known as QMS-ENV-HSE or electronic databases.</p> <p>Files relative to incident reports, safety audits, inspections and statistical data are maintained by the Health and Safety Manager and Quality Manager.</p>

	<p>A clear Control of Company Documents Policy is published within ACE Quality system, as referred to above. This should be referred to when producing, reviewing and updating controlled documents. The purpose of this system is to:</p> <ul style="list-style-type: none"> • Ensure approval of documents for adequacy prior to issue • Review and update as necessary and re-approve documents • Ensure that changes and the current revision status of documents are identified • Ensure that applicable documents are available at all points of use • Ensure that documents remain legible and readily identifiable • Ensure that documents of external origin determined by the company to be necessary for the planning and operation of the OH&S management system are identified and their distribution controlled; • Prevent the unintended use of obsolete documents and apply suitable identification to them if they are retained for any purpose • Records are retained for the duration of the required period of legal or statutory requirement
2.	Design drawings and specific documentation relating to jobs are held within the project and contract files. Drawings are re issued when changes are made and revision numbers are issued.
3.	<p>Controlled: Available to ALL ACE employees</p> <ol style="list-style-type: none"> 1. These are saved in a PDF format in the SHARED Health & Safety and Quality Document area; Intranet Drive. 2. These will be noted with a footer containing the last date of review and next review date. 3. It is the responsibility of the Quality Manager to renew documents in the SHARED folder and to allow new controlled documents to be issued to ACE employees. 4. All changes, updates and new additions will also be communicated through e-mail to all ACE employees. <p>External controlled access to documentation</p> <p>All controlled documents for the public and staff/subcontractors of ACE will be made available in USB drive format. It is the responsibility of the Operations Manager to ensure these documents are available on site and that subcontractors are appropriately briefed on their content and location.</p> <p>Health & Safety and Quality Controlled Documents are all located in SHARED FOLDERS and available from our website www.aquaticcontrol.co.uk.</p>
4.	REVIEWS

	<p>Legislation review can be relatively complex; thus it is important that regular external communications are filtered by the Managing Director. Where appropriate external advice from a suitably qualified professional can be sought and additional training identified.</p> <p>Any changes identified in legislation or review are used to update documentation systems and then notified to senior employees at Quarterly Management Review meetings. Following a Management Review, a process for informing additional employees is formulated and rolled out. This can include:</p> <ol style="list-style-type: none"> 5. E-mails and updating of controlled documents 6. Training sessions provided 7. External training and/or courses provided 8. Changes in organisation of facilities; office movements, removal or addition of a facility etc. 9. Additional meetings and changes in company policy/ job descriptions or similar 10. Additions, removal or updates of the legislation library. <p>Annual Review:</p> <ol style="list-style-type: none"> 11. All controlled documents are reviewed on an annual basis as a minimum standard. These revisions are communicated via hard copies and require a signature. <p>Quarterly Review:</p> <ol style="list-style-type: none"> 12. Any controlled documents identified as requiring review will be highlighted at quarterly management reviews for consultation. <p>On-going Review:</p> <ol style="list-style-type: none"> 13. All controlled documents are living documents and may need revision on a day to day basis as legislation and improved working systems dictate. These changes are communicated as and when to all staff by means of e-mail. <p>Revisions are clearly indicated by adding the number of the revision behind the electronic document name.</p> <p>Approval:</p> <p>The Managing Director will approve all changes to be communicated. No changes will be distributed without approval.</p>
	GENERAL CONTROLS
5.	The Organisation's computer system is regularly backed up with a copy securely stored.
6.	The integrity of the computer system and the data held on it is maintained by running background virus protection software and the maintenance of effective and regularly updated firewalls.

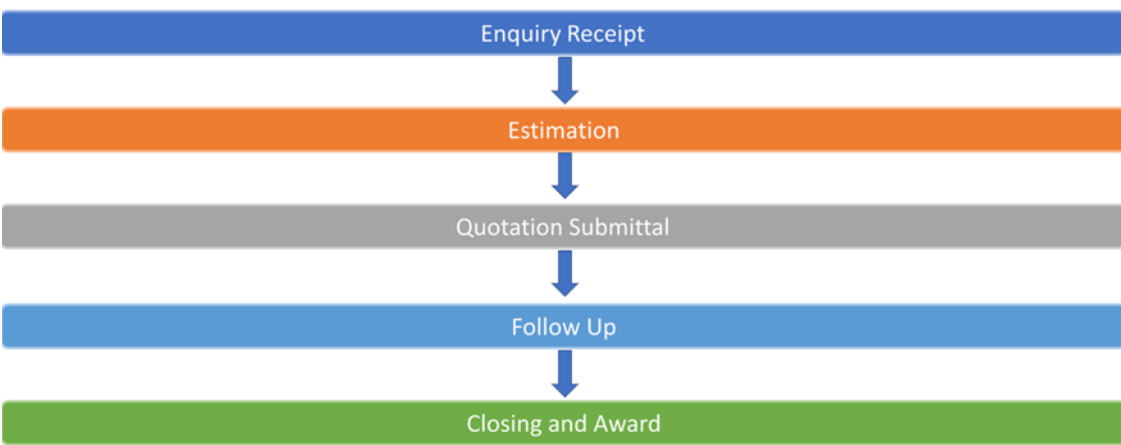
8 - OPERATION

8.1	Operational Planning and Control
	STATEMENT/PROCEDURE
1.	The Context of the organisation and its interested parties, outlines the requirements for ACE products and Services and the scope of works offered. The operational planning processes are identified in line with various key policies; Quality Policy, Occupational Health and Safety Policy and the Environmental and Sustainability Policy.
2.	The three main business Operational processes; Sales, Projects & Operations, are outlined within this Integrated Manual and integrating Q,OH&S procedures and risk assessments are shown with the method of responsibility and change in requirements on the Company Intranet Drive.
3.	Each ACE employee is responsible for planning their own work, utilising the processes set within their department by their line manager and issued on the Company Intranet drive.
4.	All enquiries and confirmed orders are processed in a planned and organised manner in order to ensure that any commitment made to the customer can be conducted on time and within budget. Any Contractual agreements are signed by the Sales Director and Managing Director.
5.	Regular informal meetings take place at which any significant issues are discussed and appropriate action is agreed and implemented, as necessary. Notes may be added to the job information for future reference.
6.	The organisation has determined and documented it's requirements for the procurement of products and services, including environmental factors in the specific Procurement Policy & Procedure document.
7.	The Organisation considers at every appropriate level the need to provide information about potential significant Environmental Impacts associated with the transportation or delivery, use, end-of-life treatment and final disposal of its products and services.
8.	Whenever it is considered relevant to the goods or services required, a copy of the Organisation's Health and Safety Policy, Quality Policy and Environmental Policy is issued to all suppliers and sub-contractors. In addition, when appropriate, suppliers and sub-contractors are made aware of the Organisation's position relating to the HSEQ, in particular with regard to matters relevant to the achievement of its Environmental Objectives and Targets, Health and Safety targets and Quality commitments (HSEQ KPI document)

8.2	Emergency Preparedness and response
	STATEMENT/PROCEDURE

1.	This Integrated Management System follows the HSEQ; Health, Safety & environmental Emergency procedures documentation across the business for its operations as outlined within Planning.
2.	<p>All ACE facilities and work places are to have emergency preparedness and response procedures in place. ACE provides relevant information and training related to emergency preparedness and responses including Environmental awareness such as pollution prevention and cleaning up spills help sheets.</p> <p>Emergency situations that could occur at ACE business locations could include but not be restricted to fires, bomb threats, chemical spillage, release of toxic or otherwise hazardous substances, major disaster, extreme weather conditions etc.</p> <p>Risk Assessment Method statements will be available to give guidance at all locations on the development and implementation of effective specific emergency procedures.</p>
3.	Emergency procedures are to identify the titles of key personnel and the procedures to be adopted in the event of an emergency situation. The procedure is to be written in a format that ensures understanding and include an at a glance chart identifying the roles of personnel in unison in the event of an emergency situation. Emergency procedure practice drills are to be carried out across all locations as appropriate at least once in every 12-month period.
4.	<p>Project procedures are to be developed when required for specific contractual obligation.</p> <p>This could include requirements for working as Sub contractor where the Main Contractors Emergency Procedures will apply. Bridging documents will be produced linking ACE Emergency Procedures with those of the Main Contractor or other relevant parties (e.g. Dive Teams)</p>

8.3	Requirements for Products and Services – Customer Communication
	STATEMENT/PROCEDURE
1.	<p>Customer communication for ACE products and services is determined by the Sales process and enquiry folders.</p> <p>Enquiries may be received via a variety of methods and once information has been reviewed, the requirement will be passed to the correct area; standards or bespoke sales with regional managers or the internal sales team. If the requirements of the customer cannot be met, the customer will be informed.</p>

	<p>SALES PROCESS</p>  <pre> graph TD A[Enquiry Receipt] --> B[Estimation] B --> C[Quotation Submittal] C --> D[Follow Up] D --> E[Closing and Award] </pre>
2.	ACE ensure customer feedback is obtained relating to end of projects, sales and operations works.

8.4	Determining and reviewing requirements for products and services
	STATEMENT/PROCEDURE
1.	<p>When determining the requirements for products and services ACE ensure the review is completed with the Sales process and Projects process and handovers between departments as shown within this integrated manual.</p> <p>This is also relating to requirements such as risk assessments, construction phase plans, method statements, O&M manuals, Drawings requirements, minutes of meetings etc.</p>
2.	Where appropriate, Health & Safety & Environmental Risk Assessments may be carried out and documented, and Method Statements defined accordingly, and submitted along with the written quotation. In cases where manufacturing arrangements via a specialist sub-contractor are required, the relevant Layout Drawings are supplied at the point of quotation/tender issue.
3.	The Organisation provides amended or revised quotations if requested by the customer. Senior management fully reviews all such requests in order to ensure that the requirements can be met, within the agreed budget, and time limits. Should the review prove to be negative, the customer is informed and the matter resolved.
4.	Where the Organisation has produced Contracts, Agreements etc., they will be reviewed before release to ensure the continuing commitment of the Organisation to provide the goods or services on time and within budget.

5.	The customer's written order is reviewed against any previously generated documents and correspondence to ensure anomalies do not exist. Should anomalies occur, the customer shall be informed and the situation resolved before any further commitment is made by the Organisation.
6.	Whenever possible, the customer is asked to provide an order reference.
7.	If the customer requests an amendment to the order during its execution, the requested amendment is reviewed to ascertain whether the Organisation is still able and willing to accommodate the order. In all cases, the customer and appropriate staff are kept informed until the matter is resolved.

8.5	Changes to requirements for Products and Services
	STATEMENT/PROCEDURE
1.	<p>Changes to requirements for products and services shall be documented within the project file and supplier / subcontractor file, all information shall be kept on the outcomes of the review and the change required.</p> <p>This will be issued to the relevant person in control and to be aware of the change requirements.</p>

8.6	Design and Development of Products and Services
	STATEMENT/PROCEDURE
1.	<p>The HSEQ Design and Development process is lead by the Technical Director and Managing Director in line with the Sales, Projects and Operations Process.</p> <p>Aquatic Control Engineering work to design regulations and the ISO 9001 Quality standard whilst also ensuring they understand the customer requirements, identified any queries before and during the design process.</p> <p>Design work is reviewed in house to ensure design requirements have been correctly interpreted and inspections are held for specific stages of design works. Drawings are issued to sub-contractors for approval and the drawings library is revised on a regular basis to maintain the most current up to date information.</p> <p>Full details are incorporated into the HSEQ Design management procedure</p>
2.	<p>Design Responsibilities are as follows:</p> <ol style="list-style-type: none"> 1. The Technical Director is responsible for controlling, leading, planning, organising and coordinating the company's Designs 2. Project Managers are responsible to the Technical Director for design related tasks 3. The Technical Director is responsible to the Managing Director.

3.	Design and Development output is documented in the form of a General arrangement drawing and Design Risk Assessment (DRA) that is evaluated against the criteria previously established.
4.	A review of the design (using the DIC-Design inspection checklist) and development results and acceptance criteria is carried out at appropriate stages, both internally and in conjunction with the client and/or manufacturer if considered necessary. The review outcome, including any changes to the specified acceptance criteria, are documented as above as part of the quality check and control procedure.
5.	Formal verification that the design and development output meets the input requirements must be carried out and documented in the Project ITP. The names of the originator, checker and approver are noted on the drawing and the project ITP. Full detail is incorporated into the HSEQ Design Management Procedure
6.	Prior to commencement on site, all residual risks related to the design process shall be highlighted by the Designer to the Principal Designer and the Contractors. In some cases an SDRA (Site design risk assessment) may be required to identify and mitigate site specific risks. The Principal Contractor will ensure that Risk Assessments and Method Statements shall be in place to manage the residual risks.
7.	All construction works which involve design proposals or changes will be related to the Client and the Principal Designer as required by the CDM regulations; ACE have a CDM 2015 Duties Procedure
8.	<u>H&S file</u> The following information may be provided to the client or end-user, as required. <ul style="list-style-type: none"> • A brief description of the work carried out, general details of the construction methods and materials used • Residual hazards and how they have been dealt with or to be dealt with (e.g. buried services, asbestos, contaminated land, special coatings which should not be burnt off) • Details of the structure's equipment and maintenance facilities • Maintenance procedures and requirements for the structure • Manuals • Details on the location and nature of utilities and services, including emergency and firefighting systems • as built drawings and plan • key structural principles incorporated in the design (e.g. bracing, SWL)

8.7	Control of externally provided products and services
8.8	Information for external providers
	STATEMENT/PROCEDURE

1.	Supplier records are maintained on a regular basis, including the review of supplier performance. These records are available to all members of staff who hold the authority to purchase thus ensuring that only suppliers meeting the Organisation's quality criteria are used.
2.	Credit Quality of organisations is checked ongoing using Credit Safe. Procedures are in place for high, low and medium risk customers. High risk customers pay on order, directors decide on payment terms for the medium risk group and low risk customers have 30 days' terms unless otherwise agreed. See ACE Terms and Conditions in place – located on the Company Intranet Drive and website.
3.	The Quality Manager reviews all approved suppliers and sub-contractors using the HSEQ Supplier and Sub Contractor Vetting Procedure
4.	All incoming goods are inspected against the accompanying documents and the original Purchase Order, to ensure compliance with the original requirements. Where appropriate, all deliveries made directly to site are inspected by the Organisation's representative for order compliance.
5.	Further checks are conducted to ensure that the goods received are fit for their intended purpose, and free from defects – Warehouse Goods In Release Note.
6.	Should there be a requirement for verification at the supplier's premises, by the Organisation or the customer's representative, then the details of the verification process to be used is described in the purchasing documents.

8.9	Production and Service provision
	STATEMENT/PROCEDURE
1.	Production and service provision shall be put into practice by ACE under controlled conditions in line with specific procedures of Sales, Projects and Operations Process.
2.	<p>All staff carry out their work reflecting:</p> <ol style="list-style-type: none"> 1. Agreements with customers 2. Their skills, training, qualifications and experience 3. Further instructions from more senior management 4. Further instructions from customers. <p>Therefore, documented generic work instructions are not considered appropriate.</p>
	SALES (PARTS) OR (COMPLETE UNITS)

3.	On receipt of the customer's confirmed order, the stock control system is checked in order to ensure that the required parts may be despatched as requested by the customer. Where such stock shortfalls are evident, procedures as defined in Section 7.4 (Communication) are followed, and the customer notified of any delays.
4.	Where stock levels are adequate, a Delivery Note is prepared, and the parts collated and arrangements made for despatch; utilising the Warehouse Goods Out procedure
5.	Where the delivery of the product (parts) are contractually the responsibility of the Organisation, it shall make every endeavour to ensure that the mode of transport selected is complimentary to the product.
	MANUFACTURE
6.	Where equipment is required that falls outside of the standard product ranges of the chosen suppliers, specifications are issued to those suppliers for bespoke manufacture.
7.	Where practicable, inspections are performed at the manufacturing site in line with Quality checking and inspections.
8.	All Purchase Orders raised for manufacture detail the customer's delivery site and arrangements.
	INSTALLATION/COMMISSIONING
9.	For installation and commissioning of the manufactured unit, Method Statements and Manuals are prepared or supplied by the manufacturer for release to the installation/commissioning contractor providing sufficient information for the work to commence through to completion.
10	Once accepted the Method Statements / Risk Assessments are returned with signature to indicate acceptance and understanding of the work requirement.
	PROJECT WORK
11.	The Organisation's employees have the responsibility to ensure that all working procedures within their area of responsibility are completed to the standards set. Check and Control procedures are in place, in line with the Project Process cycle and Quality Compliance.
13.	Quality performance and any related issues will continue to be reviewed during our 3 monthly documented management reviews. Project Specific Quality performance will be reviewed during Project Progress meetings.
15.	Competent personnel Training Records and CVs are provided on request. All site employees will carry specific Occupational Health and Safety training certification such as Manual Handling, PUWER, CSCS and supervisory regulations.

16.	Approval is obtained from the Client for any deviations or departures from agreed schedules. Regular Progress Reports are generated and submitted to the client for the project duration.
17.	Drawings, diagrams, schedules and calculations are provided for approval where relevant or required. All Design Drawings and Documents shall be submitted in electronic format unless otherwise required.
18.	The installation team provides support to the (Sub)-Contractors with guidance and advice for the installation of supplied goods. Installation Manuals and Installation Instructions will be supplied where appropriate or requested.
19.	A Testing and Inspection schedule is agreed with the Client that identifies all key inspection points and tests prior to manufacture. These may include: <ul style="list-style-type: none"> 1. Material traceability / certification 2. Recorded dimensional checks on component parts 3. NDT weld checks 4. Hydrostatic testing 5. A witnessed factory inspection.
20.	Detailed commissioning procedures shall be generated and submitted to the client for approval prior to commissioning; as outlined in the RAMS

8.10	Property belonging to customers and external providers
	STATEMENT/PROCEDURE
1.	On its receipt by the Organisation, customer property is clearly identified and subsequently processed in accordance with the relevant procedures set out in Preservation section of this Integrated Manual.
2.	All data and information provided by customers are treated as confidential in accordance with the requirements of the General Data Protection Act and Regulation 2018 and are protected using suitable physical and electronic protection methods.
3.	Customers are notified of any loss, corruption, or other damage to their data, information or property.
4.	When the customer at no cost provides goods, services or information, they are inspected to ensure that they are fit for their intended purpose.

5.	Any unsuitability may relate to: <ol style="list-style-type: none"> 1. Type of service received 2. Inaccurate information 3. Inaccurate drawings 4. Inaccurate specifications 5. Operational incompatibility 6. Tolerance incompatibility 7. Legislative requirement 8. Unqualified nomination.
6.	When situations arise that promote concern regarding the above, the supplier of the goods or services is contacted and the matter resolved before any further commitment is made by the Organisation.

8.11	Preservation
	STATEMENT/PROCEDURE
1.	The Organisation takes all precautions in order to ensure the safe handling of products, parts, materials or process equipment and design compliance, in accordance with: <ol style="list-style-type: none"> 1. Manufacturers' guidelines 2. Declaration of Conformity 3. Supplied Data Sheets (COSHH) (where applicable) 4. Legislation pertaining to the product or the activities of the Organisation 5. Individual/personal training or qualification 6. Relevant site regulations.
2	The Organisation ensures that all products, parts, materials or process equipment, including those supplied by customers, are stored in accordance with the relevant: <ol style="list-style-type: none"> 1. Manufacturers' guidelines 2. Legislation 3. Safety requirements for the product/equipment etc.
3.	The Organisation ensures that all packaging used, in or as part of the process is suitable for the product, including its storage, handling and method of delivery.
4.	All the above conditions are made clear within the ACE Terms and conditions of purchase / Sale
5.	The Organisation ensures that all products held, and within their jurisdiction are subject to conditions, which prevent deterioration, contamination and damage. These conditions may be relevant to handling, storage and packaging as addressed above.

8.12	Post delivery activities
	STATEMENT/PROCEDURE
	<p>As applicable, the Organisation conducts the following activities that are considered “post-delivery activities”:</p> <ol style="list-style-type: none"> 1. All products are covered by the original manufacturer’s standard warranty. 2. The Organisation conducts all work in accordance with specific customer requirements and identified issues are dealt with in accordance with Organisation’s terms and conditions 3. Products supplied by the Organisation are provided in accordance with any applicable statutory and regulatory requirements in place 4. Customer Satisfaction Surveys, post project delivery, are submitted to the customer to request feedback for product and service improvement 5. The Organisation ensures that appropriate liability insurance is maintained should there be any issue in relation to any statutory and/or regulatory requirements in conjunction with its business activities.

8.13	Control of changes – Production and service provision
	STATEMENT/PROCEDURE
1.	A formal change control process is in place to ensure the proper evaluation and approval of all proposed significant changes to production and service provision.
2.	Formal changes to processes and documentation will be used by the Organisation when changes are considered significant. Minor changes may be made without formal control, however the decision on what constitutes a significant or minor change must be agreed upon by those involved in the change.
3.	A record of such significant changes including details of the methodology and those responsible for authorising the change and managing the change is reported in a Change Management Report

8.14	Release of services and products
	STATEMENT/PROCEDURE

1.	Throughout the production process, there are various passgate stages which must be checked through review or physical inspection to release to the next stage. These are set out in the ITP template, which may be enhanced with further inspections/hold points depending on the requirements of the product/project- this may also be at customer request.
2.	The final test of conformity and inspection to confirm compliance with the customer's requirements are identified on: 1. Carrier's Delivery Notes 2. For Installation Projects: Site Acceptance / Commissioning written confirmation by signature 3. For Bespoke Project Products: Final Inspection Reports.

8.15	Control of non-conforming outputs
	STATEMENT/PROCEDURE
1.	All activities not meeting the requirements of the Integrated Management System or agreements with customers are suspended pending further action. The Complaints and non-Conformance procedure and Reporting Guidelines is to be used.
2.	All materials, products, services and sub-contractor performance not meeting the required specification are clearly identified and/or segregated pending a decision regarding their further disposition.
3.	The occurrence is investigated in order to establish its cause.
4.	A record is kept within the Non-Conformance Customer file and reported using the Non-Conformance Information template. A further Non-conformance Report of the occurrence and its cause.

8.16	Management of Change
	STATEMENT/PROCEDURE
1.	The HSEQ Manual shows planning and methods for change management procedures in line with ACE Products and Services and customer requirements. Change management is reported on by the Quality Manager and Technical Director.
2.	Any specific changes to products will be dealt with in line with the Design Management process as outlined within the Quality Manual and available on the Company Intranet drive. Elements of this process will be repeated as necessary to implement the change sufficiently.

3.	Design risk assessments are carried out in which any changes will be identified. Information from DRA's is picked up in risk assessments relating to activities with the scope of works.
4.	Changes specifically to the integrated management system including any of the above will be reviewed during audits, inspections and management reviews by the Health and Safety Manager. Any specific working methods are reviewed during the specific site risk assessment method statement and reviews on the RAMS report.
5.	Any legal requirements or other requirements shall be identified on the integrated HSEQ Legislation Log.

9 - PERFORMANCE EVALUATION

9.1	Monitoring, measurement analysis and performance evaluation
	STATEMENT/PROCEDURE
1.	The Organisation monitors, measures, analyses and improves its processes in order to: <ul style="list-style-type: none"> 1. Demonstrate conformity of its activities 2. Ensure conformity to the HSEQ Management System 3. Continually improve the effectiveness of this integrated manual in line with the Quality, Environmental and Health and Safety ISO standards
2.	Monitoring and measurement of processes are achieved by implementation of the procedures set out in Sections 9. (Internal audit) and 9. (Quarterly Management review).
3.	Documents used to facilitate the monitoring and measurement of processes include but are not limited to: <ul style="list-style-type: none"> 1. Audit Records 2. Customer Feedback Records 3. Non-conformance Records 4. KPIs, reports and plans 5. Monitoring and measuring of environmental aspects and impacts 6. Employee PDR's and Performance Improvement Plans

9.2	Customer Satisfaction
	STATEMENT/PROCEDURE
1.	All ACE employees monitor levels of customer satisfaction by one or more of the following methods: <ul style="list-style-type: none"> 1. Maintenance of close relationships with each customer 2. Customer Satisfaction Questionnaires
2.	A Customer Satisfaction Questionnaire is issued to every customer following project completion, inviting graded responses to questions relating to all aspects of the Organisation's service.
3.	All returned Questionnaires are collated, analysed and passed for Management Review.
4.	Communications from customers, whether positive or negative are recorded on Quarterly Management Reviews during the year, and from this information the Organisation can review its performance for various aspects of the business.

9.3	Analysis & Evaluation Compliance
	STATEMENT/PROCEDURE
1.	Evaluation of compliance is reviewed in line with the companies HSEQ compliance with legislation and reviewed by the Quality Manager and in line with the HSEQ Management systems.
2.	The following data is analysed in order to identify trends and opportunities for preventive and/or improvement actions: <ul style="list-style-type: none"> 1. Customer Satisfaction Monitoring Records 2. Product and/or Service Conformity Records 3. Product and/or service trends 4. Results of internal Quality Audits as a measurement of the effectiveness of the Quality Management System 5. Non-conformance Records.
3.	<i>Occupational Health and Safety compliance specifics.</i> <p>Consistent with its commitment to compliance, the company has established and implemented a procedure for periodically evaluating compliance with applicable legal and other requirements to which it subscribes. The frequency of this evaluation is determined by the individual project requirements but will also have as a minimum a bi-annual review.</p> <p>These are also reviewed as part of the monthly and quarterly management reviews and any changes to legislation, ACOPS, working practices, standards etc. will be recorded, evaluated as</p>

	<p>to its impact on company operations and where applicable reviewed against policies, processes and operational instructions.</p> <p>When the requirement for change to procedures and policies are identified these will be reviewed within the context of the operation and updated. All changes are communicated as per the communication process shown within this manual.</p> <p>All changes to operational requirements or policies will be communicated to all staff (including sub-contractors who may be affected) and as relevant to interested parties</p>
--	--

9.4	Internal Audit
	STATEMENT/PROCEDURE
1.	The Integrated Manual follows the HSEQ combined Internal Audits, Inspections and Reviews procedures.
2.	<p>Management System Audit</p> <p>ACE will ensure that internal audits of the Integrated Management System are conducted at planned intervals to:</p> <ul style="list-style-type: none"> • Appoint a suitably qualified/experienced member of staff to oversee the internal ISO 9001, ISO 14001 & ISO 45001 system Audit • Determine whether the Integrated Management System conforms to planned arrangements including the requirements of the ISO 9001, ISO 14001 and ISO 45001 standard • Has been properly implemented and is maintained • Is effective in meeting the organisation's policy and objectives <p>That evidence is provided and information on the results of audits to the management team.</p> <p>Audit programme(s) will be planned, established implemented, and maintained by ACE, based on the results of risk assessments of the organisation's activities, and the result of previous audits.</p> <p>Audit process shall be established, implemented and maintained that address:</p> <ul style="list-style-type: none"> • The responsibilities, competences, and requirements for planning and conducting audits, reporting results and retaining associated records • The determination of audit criteria, scope, frequency and methods. <p>Internal audits (non formal reviews) are undertaken in accordance with a documented procedure and a pre-planned audit schedule (this may be amended to ensure non-</p>

	<p>conformity or incident investigations are fully closed out) and undertaken by a member of the safety management team.</p> <p>Any non-conformity found during internal audits shall be actioned as appropriate to its significance and practicality of implementing corrective or preventative actions.</p> <p>Results of audits shall be discussed at management review meetings.</p> <p>A documented procedure is in place within the standard operating procedures contained within the company's quality manual.</p> <p>Audit results and reviews will be kept by the company for at least 3 years.</p>
--	---

9.5	Management review (inputs and outputs)
	STATEMENT/PROCEDURE
1.	<p>The integrated management system and its implementation shall be reviewed periodically to ensure that ACE aims and objectives are being achieved, that procedures are being adhered to, and that all requirements are being met.</p> <p>These reviews are conducted at various levels and under different circumstances, for example through audits, at contract review meetings, at design review meetings, and in meetings of the senior management.</p> <p>As a minimum, a minuted management review meeting covering each of the Compliance disciplines, shall be held at 12 monthly intervals unless business or other requirements dictate that this should be more frequent.</p> <p>The Management Team at ACE is committed to ensuring the satisfaction of customer requirements at all times, and to the compliance with all relevant legal and regulatory requirements associated with the company activities.</p> <p>Adequate resources are made available at all times to ensure the effective implementation and operation of the integrated management system. To ensure that all practicable arrangements are made, management reviews are held and these ensure that stated policies and objectives are being met in a way that best meets the needs and interests of ACE and to ensure that the documented quality, environmental and health and safety management systems continue to be suitable and effective.</p> <p>Management review meetings are held every quarter and minutes are given to all ACE employees.</p> <p>Action</p> <p>Actions and those responsible for the actions have been detailed, and have timescales for completion of these actions. The Management representative monitors the actions in accordance with timescales detailed.</p> <p>Actions from reviews will be logged so that they can be monitored to ensure close out in a timely manner to result in improvement of the ACE Limited business performance.</p>

10 - IMPROVEMENT

10.1	Non-Conformity and Corrective Action
	STATEMENT/PROCEDURE
1.	<p>The effectiveness of the HSEQ Management System is continually reviewed and improved through the Management Review process by:</p> <ol style="list-style-type: none"> 1. The application of the Quality Policy 2. The application of the Occupational Health and Safety Policy 3. The application of the Environmental & Sustainability Policy and its arrangements 4. The application of the Quality, Environmental & Health and Safety Objectives 5. Internal and External Audits 6. Analysis of performance data 7. Corrective actions 8. The evaluation and treatment of risks and opportunities 9. Circulation of Management Review Minutes
2.	<p><i>The company has a Non-Conformance procedure for all employees to follow</i></p> <p>This procedure shall define the following requirements:</p> <ul style="list-style-type: none"> • Identify and correct non conformities and take actions to mitigate their Environmental, Quality & OH&S risks and consequences • Investigate their causes, and take actions to avoid recurrence • Evaluate the need for actions to prevent non conformities and implement appropriate actions to avoid occurrence • Record and communicate the results of corrective actions, implement preventative actions • Review the effectiveness of corrective and preventative actions <p><i>Types of non-conformances could include:</i></p> <ul style="list-style-type: none"> - Protective equipment not functioning properly - Failure to fulfil legal requirements and other requirements - Procedures not being followed - Policy not being followed -

	<p><i>Specific Health and Safety Corrective Action relating to Accident, Incident Investigations</i></p>
	<p>Procedures are in place for the investigation and reporting of incidents, which could occur during ACE operations.</p> <p>The Operations Health and Safety Manager is responsible for Incident Investigation or appointing a suitably qualified and competent person to carry the investigation out on their behalf. This includes all investigations including incidents reportable under RIDDOR.</p> <p>The following accident and incident types should be categorised but may vary dependent upon local requirement:</p> <ul style="list-style-type: none"> • Fatalities • Over seven day lost time incidents • One day lost time incidents • Near miss incidents • Non injurious incidents • Medical treatment cases • First aid incidents <p>The respective Site Supervisor or Manager is responsible for ensuring that the Health and Safety Manager is advised of all incidents, accidents or near miss and for initiating prompt investigation using the standard ACE incident report form.</p> <p>Where applicable a dynamic risk assessment will be implemented to protect employees, Sub-contractors or others who may be affected by the occurrence, as well as protecting the incident site during investigation.</p> <p>All Investigations follow Health and Safety at Work Act guidance and RIDDOR guidance.</p> <p>Corrective Actions</p> <p>Non-conformance and or corrective actions or action resulting from formal audits and reviews are registered in a log and expedited through to completion by the Quality and Compliance team.</p> <p>Root causes are identified and actions taken to prevent recurrence corrective and preventative actions are monitored for effectiveness, prior to close out.</p> <p>If the corrective or preventative action involves revision to existing controls or processes, then the changes will be subjected to the risk assessment process prior to implementation.</p> <p>Audits and Inspections</p> <p>The safety audit procedures and inspection requirements are shown within the H&S plans. Audit schedules will be developed to cover ACE operations either as project-specific schedules or as overall schedules addressing office accommodation, stores etc. and construction sites. The Compliance Manager is responsible for ensuring that audits are carried out and the Healthy and Safety Manager is responsible for:</p>

	<ul style="list-style-type: none"> • Arranging the audits and inspections in line with the appropriate schedules and project needs • Advising the operations and project team of impending audits • Maintaining the records of audits performed and progressing actions to achieve 'close-out' • Advising management of the audit result • Maintaining a log of corrective action requests and monitoring their implementation. <p>Safety Audits and inspection procedures are detailed within the management system.</p> <p>The Compliance Department are responsible for auditing the safety management system.</p>
--	--

10.2	Continual Improvement
	STATEMENT/PROCEDURE
1.	ACE ensures continual improvement of the suitability, adequacy and effectiveness of the Integrated Manual by application of the procedures documented in the Planning, Management Review and Improvement sections within this manual.
2.	ACE review the Integrated management system on a regular basis using reporting methods as outlined in this management system; KPI's, Plans, Reports
3.	ACE has a commitment to both Quality and Occupational Health & Safety as outlined in the company's Policies and business planning with key performance indicators specifically for Healthy and Safety.