

R&M POLICY · HEALTH AND SAFETY

Risk Management Policy

R&M Property Group Ltd

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Approved by	Thom McKenna, Director
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Director's Policy Statement

R&M Property Group Ltd recognises that effective risk management is fundamental to the safe delivery of construction and development projects. Risk assessments are not a paperwork exercise - they are the central mechanism through which we identify hazards, evaluate the potential for harm, implement proportionate controls, and communicate the information that every person on our sites needs to work safely.

This policy establishes a structured, systematic approach to risk management that goes beyond minimum legal compliance. It defines how we identify risks at every stage of a project, how we compile and authorise risk and impact assessments, how we ensure that site-specific issues are captured and acted upon, how we communicate assessment findings to our workforce, clients, and supply chain, and how we link method statements to risk assessments with regular periodic reviews.

I am personally committed to ensuring this policy is resourced, implemented, and continuously improved. Every manager, supervisor, and team leader in R&M is accountable for applying it on the projects and activities under their control.

Thom McKenna, Director - R&M Property Group Ltd

2. Purpose and Scope

2.1 Purpose

This policy sets out R&M Property Group Ltd.'s arrangements for managing health, safety, and environmental risks across all business activities. It provides a framework that ensures:

- Risks are identified proactively at every project stage, from feasibility through to completion and handover.
- Risk and impact assessments are compiled by competent persons, reviewed by senior management, and formally authorised before work commences.
- Site-specific issues, near misses, incidents, and changing conditions are fed back into risk assessments promptly.
- Assessment findings and control measures are communicated effectively to the workforce, clients, and subcontractors, with records of all briefings retained.
- Method statements are directly linked to the relevant risk and impact assessments and are subject to periodic review.
- The entire risk management process is monitored, reviewed, and improved on a continuous cycle.

2.2 Scope

This policy applies to:

- All R&M Property Group Ltd employees, including directors, managers, office-based staff, and site personnel.
- All subcontractor firms, their operatives, and self-employed persons engaged on R&M projects.
- Agency workers and labour-only suppliers working under R&M's direction.
- Consultants, designers, and professional advisors contributing to R&M projects.

- Activities carried out on construction sites, in offices, during travel, and at any location under R&M's control or influence.

The policy covers health and safety risk assessments, environmental impact assessments, fire risk assessments, COSHH assessments, manual handling assessments, noise and vibration assessments, and any other statutory or project-specific risk evaluations required.

3. Legal and Regulatory Framework

This policy supports compliance with the following legislation:

- Health and Safety at Work etc. Act 1974 - Sections 2 and 3: general duties to ensure, so far as is reasonably practicable, the health, safety, and welfare of employees and others affected by the undertaking.
- Management of Health and Safety at Work Regulations 1999 - Regulation 3: duty to carry out suitable and sufficient assessment of risks; Regulation 5: arrangements for effective planning, organisation, control, monitoring, and review; Regulation 7: appointment of competent persons.
- Construction (Design and Management) Regulations 2015 - Regulation 4: general duties to eliminate or reduce risks; Regulation 12: construction phase plan; Regulation 13: principal contractor duties to plan, manage, monitor, and coordinate; Regulation 14: consultation and engagement with workers.
- Control of Substances Hazardous to Health Regulations 2002 (COSHH) - assessment of exposure to hazardous substances.
- Manual Handling Operations Regulations 1992 - assessment of manual handling risks.
- Work at Height Regulations 2005 - risk assessment for all work at height activities.
- Control of Noise at Work Regulations 2005 and Control of Vibration at Work Regulations 2005 - exposure assessments.
- Regulatory Reform (Fire Safety) Order 2005 - fire risk assessment.
- Environmental Protection Act 1990 and Environment Act 2021 - environmental impact and pollution risk.
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR) - incident investigation feeding back into risk assessment.
- Corporate Manslaughter and Corporate Homicide Act 2007 - senior management duty of care.
- Building Safety Act 2022 - enhanced competence and accountability requirements.

The policy also aligns with HSE guidance HSG65 (Managing for Health and Safety), the Plan-Do-Check-Act model, and industry standards promoted by the Construction Industry Advisory Committee (CONIAC) and Build UK.

4. How the Company Identifies Risks

R&M employs a multi-layered approach to risk identification that operates at corporate, project, and task levels. Risk identification is not a one-off exercise - it is continuous throughout the lifecycle of every project.

4.1 Corporate-Level Risk Identification

At the corporate level, R&M maintains a strategic risk register that captures business-wide health, safety, and environmental risks. This register is reviewed quarterly by the board of directors and covers:

- Common hazards across the R&M project portfolio (work at height, excavations, plant operations, temporary works, lifting operations, asbestos, services strikes).
- Emerging risks from changes in legislation, industry guidance, or enforcement trends.
- Lessons learned from incidents, near misses, and enforcement action across all R&M projects and the wider industry.
- Supply chain risks, including subcontractor competence, labour provider compliance, and materials safety data.
- Environmental risks, including pollution, waste, ecology, and community impact.

4.2 Project-Level Risk Identification

At project level, risk identification begins at the earliest stage and continues through to handover:

- **Pre-construction:** Review of the pre-construction information (PCI) provided under CDM 2015, including ground investigation reports, asbestos surveys, existing services records, site constraints, and neighbouring property risks. The Principal Designer's design risk register is reviewed, and residual risks are carried forward into the construction phase plan.
- **Construction phase plan:** Before work commences on site, the construction phase plan is developed by the site manager in consultation with Phillip Hollingworth, Compliance Officer, and the project team. This identifies all significant risks for the project, the control measures to be applied, and the arrangements for managing high-risk activities including work at height, excavations, lifting operations, temporary works, hot works, and confined space entry.
- **Pre-start package reviews:** Before each subcontractor package commences, a pre-start meeting is held to review the subcontractor's risk assessments and method statements (RAMS), identify interface risks with other trades, and agree site-specific control measures.
- **Ongoing identification:** Throughout the project, risks are identified through daily site inspections, weekly safety walks, behavioural safety observations, near-miss and hazard reports, toolbox talks, progress meetings, and feedback from the workforce. Any new or changed risk triggers an update to the relevant assessment.

4.3 Task-Level Risk Identification

At task level, operatives and supervisors identify risks through:

- Point-of-work risk assessments (POWRA) - a brief, structured check carried out by the operative or team before starting a specific task, confirming that the hazards are understood, controls are in place, and conditions have not changed since the main risk assessment was completed.
- Dynamic risk assessment - the continuous, real-time assessment of changing conditions during work (weather, ground conditions, adjacent activities, unexpected findings). Where conditions change materially, work is stopped and the task risk assessment is reviewed before recommencing.

- Permit-to-work systems - for high-risk activities (hot works, confined space entry, live services, roof work), the permit process includes a specific risk review as a condition of authorisation.

4.4 Risk Identification Tools

R&M uses the following tools and techniques to support risk identification:

- Hazard checklists tailored to construction activities and project types.
- Previous project risk registers and lessons-learned databases.
- HSE and industry alerts, safety bulletins, and CROSS (Collaborative Reporting for Safer Structures) reports.
- Manufacturer safety data sheets (SDS) for materials and substances.
- Accident and near-miss data from R&M projects and the wider industry (HSE statistics, RIDDOR data).
- Workforce consultation - operatives are actively encouraged to report hazards and risks through the near-miss reporting system, toolbox talks, and direct engagement with supervisors.

5. How the Company Manages and Reviews Risk Processes

5.1 Risk Evaluation Methodology

Once a hazard is identified, R&M evaluates the risk using a structured likelihood-versus-severity matrix:

Likelihood: Rated on a five-point scale from very unlikely (1) to almost certain (5), considering the frequency of exposure, the number of persons exposed, and the effectiveness of existing controls.

Severity: Rated on a five-point scale from insignificant injury (1) to fatality or life-changing injury (5), considering the worst credible outcome.

Risk rating: Likelihood multiplied by severity gives a risk score from 1 to 25. Risks are categorised as Low (1-4), Medium (5-9), High (10-15), or Very High (16-25). Controls are applied following the hierarchy of control until the residual risk is reduced to as low as reasonably practicable (ALARP).

5.2 Hierarchy of Control

Controls are selected and applied in strict order of priority:

- Elimination - remove the hazard entirely (design out, change the process, use alternative materials).
- Substitution - replace with a less hazardous alternative.
- Engineering controls - physical barriers, guarding, ventilation, edge protection, mechanical aids.
- Administrative controls - safe systems of work, permits, training, supervision, signage, time-limited exposure.
- Personal protective equipment (PPE) - last resort only, used alongside higher-order controls, not as a substitute.

Risk assessments explicitly record the hierarchy level of each control measure. Over-reliance on PPE or administrative controls alone is challenged during the review process.

5.3 Risk Register Management

Each project maintains a live risk register that is:

- Created during pre-construction planning and populated with risks from the PCI, design risk register, and construction phase plan.
- Updated whenever a new risk is identified, an existing risk changes, or a control measure is found to be inadequate.
- Reviewed at weekly site progress meetings by the site manager and subcontractor supervisors.
- Reviewed monthly by the project manager, with a summary report to the Director of Operations.
- Closed out at project completion, with lessons learned captured and fed into the corporate risk register.

5.4 Periodic Review Cycle

R&M operates a structured review cycle for all risk assessments:

- **Daily:** Point-of-work risk assessments reviewed by operatives before each task. Dynamic risk assessment is continuous.
- **Weekly:** Site manager reviews the project risk register at the weekly progress/safety meeting. Any new or changed risks are documented and communicated.
- **Monthly:** Project manager reviews risk register, incident data, near-miss trends, and observation data. Findings are reported to Jon Scurr, Director of Operations.
- **Quarterly:** The corporate risk register is reviewed by the board, incorporating lessons from all active projects, legislative changes, and industry developments.
- **Annually:** Full review of the risk management policy and procedures, led by Thom McKenna with input from Phillip Hollingworth and the project management team.
- **Triggered review:** Any significant incident (RIDDOR-reportable, enforcement action, high-potential near miss), change in legislation, change in work method, or introduction of new plant/materials triggers an immediate review of the relevant risk assessments regardless of the scheduled cycle.

6. Responsibility for Compiling and Authorising Risk/Impact Assessments

R&M operates a clear chain of responsibility for the compilation, review, and authorisation of all risk and impact assessments:

6.1 Compilation

Corporate and generic risk assessments are compiled by Phillip Hollingworth, H&S Adviser (Spectra Safety), drawing on industry standards, legislative requirements, HSE guidance, and R&M's operational experience. Phillip holds NEBOSH qualifications and is the company's appointed competent person under Regulation 7 of the Management of Health and Safety at Work Regulations 1999.

Project-specific risk assessments are compiled by the site manager for the project, with technical input from Phillip Hollingworth, the design team (Graham Stevenson, Principal Designer, VIEW Architects), and relevant subcontractor supervisors. The site manager has

day-to-day knowledge of site conditions and is best placed to identify project-specific hazards.

Subcontractor risk assessments are compiled by the subcontractor's own competent person and submitted to R&M for review before work commences. Louis Howard, Procurement Manager (Enabl), ensures that subcontractor RAMS are received as a condition of the purchase order. The site manager reviews them for site-specific relevance and adequacy.

Specialist assessments (COSHH, noise, vibration, fire, asbestos, temporary works) are compiled by appropriately qualified and experienced persons, either in-house or through specialist consultants engaged by R&M.

6.2 Review

Before any risk assessment is authorised, it is reviewed for adequacy by a second competent person:

- Generic and corporate assessments: compiled by Phillip Hollingworth, reviewed by Jon Scurr (Director of Operations).
- Project-specific assessments: compiled by the site manager, reviewed by Phillip Hollingworth.
- Subcontractor assessments: reviewed by the site manager and, for high-risk activities, by Phillip Hollingworth.
- Design risk assessments: compiled by the design team, reviewed by Graham Stevenson (Principal Designer).

The review checks that the assessment is suitable and sufficient, that the hierarchy of control has been properly applied, that residual risks are ALARP, and that the assessment addresses the specific conditions of the site and task.

6.3 Authorisation

Risk assessments are formally authorised (signed and dated) by the following persons before the relevant work commences:

- Corporate and generic assessments: authorised by Thom McKenna, Director.
- Project-specific and construction phase plan assessments: authorised by the project manager.
- Subcontractor assessments: accepted by the site manager on behalf of R&M. Assessments that are inadequate or not site-specific are rejected and returned to the subcontractor for revision before acceptance.
- Specialist assessments: authorised by Phillip Hollingworth on confirmation that the specialist is appropriately qualified.

No work may commence until the relevant risk assessment has been compiled, reviewed, and authorised through this process. This requirement is communicated to all subcontractors through the pre-start meeting and subcontract terms.

7. Incorporating Site Issues into Risk/Impact Assessments

Risk assessments are living documents. R&M has established the following mechanisms to ensure that site-specific issues, changing conditions, and operational learning are incorporated promptly:

7.1 Near-Miss and Hazard Reporting

All near misses, hazards, and unsafe conditions reported through the near-miss reporting system (cards, digital reports, verbal reports) are reviewed by the site manager within 24 hours. Where a reported issue reveals a risk not covered by the current assessment, or a control measure that is not working as intended, the relevant risk assessment is updated immediately. The update is recorded, the revised assessment is re-authorised, and the change is communicated to all affected persons at the next available briefing (or immediately if the risk is significant).

7.2 Incident Investigation

Every workplace incident - whether resulting in injury, damage, environmental impact, or a near miss with high potential - is investigated using root cause analysis. Investigation findings include a specific section on whether the existing risk assessment adequately identified the hazard and whether the control measures were sufficient. Where the investigation identifies a gap, the risk assessment is revised as a corrective action, with a named owner and completion date tracked through the site action log.

7.3 Daily and Weekly Site Inspections

The site manager conducts daily walkarounds and a formal weekly site inspection. Inspection findings that identify new hazards or changed conditions - such as unexpected ground conditions, proximity of live services, changes to adjacent property use, environmental factors, or interface risks from overlapping subcontractor activities - are cross-referenced against the current risk assessments. Any discrepancy triggers an assessment update.

7.4 Workforce Feedback

Operatives and subcontractor workers are encouraged to raise site-specific issues through toolbox talks, safety suggestion schemes, behavioural safety observations, and direct conversation with supervisors. Issues raised are logged and assessed for risk significance. Where a pattern emerges (for example, repeated concerns about a specific access route, welfare provision, or plant/pedestrian interface), the relevant risk assessment is reviewed and amended.

7.5 Design Changes and Variations

Any design change, variation, or revised construction sequence during the project is assessed for its impact on existing risk assessments. The design team notifies the site manager of changes, and a joint review determines whether the current assessments remain valid or require revision. This process is managed through the project change control procedure and recorded in the risk register.

7.6 Seasonal and Environmental Changes

Risk assessments are reviewed seasonally to account for changing environmental conditions: heat stress and UV exposure in summer, reduced daylight and ice/frost in winter, wind loading for work at height and crane operations, heavy rain affecting excavations and ground conditions, and the impact of adverse weather on welfare provision and mental health.

8. Communication of Risk/Impact Assessments

A risk assessment has no value unless the people who need to act on it understand its content. R&M operates structured communication processes for the workforce, clients, and subcontractors, with formal records of all briefings retained.

8.1 Communication to the Workforce

Site induction: Every person inducted onto an R&M site receives a briefing on the key risks identified in the construction phase plan and the specific control measures in place. The induction covers high-risk activities on the project, emergency procedures, reporting arrangements, and the individual's right and responsibility to raise concerns. Induction attendance is recorded on the site induction register, signed by the inductee, and retained for the duration of the project plus 6 years.

Task briefings: Before any work activity commences, the supervisor or site manager delivers a task-specific briefing covering the relevant risk assessment findings, method statement requirements, and control measures. Operatives are given the opportunity to ask questions and raise concerns. Briefings are recorded on the task briefing record sheet, signed by all attendees, and filed on the project safety file.

Toolbox talks: Weekly toolbox talks address specific risks relevant to the current phase of work. Where a risk assessment has been updated in response to a site issue, incident, or near miss, the change is communicated through a targeted toolbox talk within 48 hours. Attendance and content are recorded and retained.

Safety notice boards: Key risk assessment summaries, safe systems of work, and emergency procedures are displayed on the site safety notice board in the welfare area and at the site entrance. These are updated whenever assessments are revised.

Point-of-work risk assessment briefings: POWRA briefings are delivered by the team leader or lead operative at the point of work each day or shift. The POWRA card is completed and signed by all team members, confirming they understand the task-specific hazards and controls. Completed POWRA cards are collected weekly and retained by the site manager.

8.2 Communication to Clients

R&M communicates risk management information to clients through:

- The construction phase plan, issued to the client before work commences and updated throughout the project.
- Monthly project reports that include a summary of the current risk profile, key risks, and any significant changes to risk assessments.
- Immediate notification of any significant incident, enforcement action, or high-potential near miss, including the risk assessment review and corrective actions taken.
- Progress meetings at which risk management is a standing agenda item, including any changes to the risk register and lessons learned.
- Framework reporting as required by clients, including KPI data on risk management performance.

8.3 Communication to Subcontractors

R&M communicates risk assessment findings to subcontractors through:

- Pre-start meetings: before each subcontractor package commences, a pre-start meeting is held at which R&M's project-specific risk assessments, the construction phase plan, site rules, emergency procedures, and interface risks are reviewed. The subcontractor's own RAMS are discussed and any site-specific amendments required are agreed. Minutes of the pre-start meeting are recorded and distributed.
- Subcontract documentation: the subcontract order includes the project risk summary, site rules, and the requirement to comply with all R&M risk assessments and safe systems of work. Subcontractors acknowledge receipt and understanding as a condition of the order.
- Coordination meetings: weekly or fortnightly coordination meetings include a review of current and upcoming risks, interface issues between trades, and any changes to the risk profile. Minutes are circulated to all subcontractors.
- Safety alerts: where a significant risk or incident arises, R&M issues a safety alert to all subcontractors on the project within 48 hours, including the revised risk assessment and any additional control measures required.

8.4 Retention of Briefing Records

All records of risk assessment communication and briefings are retained as follows:

- Site induction records: retained for the duration of the project plus 6 years (consistent with limitation periods for personal injury claims).
- Task briefing records: retained for the duration of the project plus 6 years.
- Toolbox talk attendance records: retained for the duration of the project plus 6 years.
- POWRA cards: retained for the duration of the project plus 6 years.
- Pre-start meeting minutes: retained for the duration of the project plus 6 years.
- Coordination meeting minutes: retained for the duration of the project plus 6 years.

Records are stored in the project safety file during the construction phase and transferred to the company's central document management system at project completion. Records are managed in accordance with UK GDPR and the Data Protection Act 2018, with personal data processed on the lawful basis of legal obligation (Article 6(1)(c) UK GDPR) and legitimate interests (Article 6(1)(f)).

9. Method Statements and Risk/Impact Assessments

9.1 Linkage Between Method Statements and Risk Assessments

R&M requires that every method statement is directly linked to its corresponding risk assessment. Method statements are not standalone documents - they describe the safe system of work that implements the control measures identified in the risk assessment. The relationship works as follows:

- Each method statement references the specific risk assessment(s) it relates to by document number, title, and revision date.
- The method statement describes, step by step, how the work will be carried out safely, implementing the control measures specified in the risk assessment.
- Where the risk assessment identifies specific competence requirements (training, qualifications, experience), the method statement specifies the minimum competence for each role involved in the task.
- Where the risk assessment identifies specific equipment, PPE, or environmental controls, the method statement details exactly what is to be used, how, and by whom.

- If the risk assessment is updated (for example, due to a site issue or triggered review), the corresponding method statement is reviewed simultaneously and updated as necessary to reflect the revised controls.

9.2 Subcontractor RAMS

Subcontractors are required to submit their risk assessments and method statements as a linked pair (RAMS). R&M's review process checks that:

- The risk assessment is suitable and sufficient for the specific task and site conditions (not a generic, office-produced document).
- The method statement directly references and implements the controls in the risk assessment.
- Both documents are site-specific - they reference the actual project, location, conditions, and interface risks.
- Both are signed and dated by a competent person within the subcontractor's organisation.

RAMS that do not meet these criteria are rejected and returned to the subcontractor for revision. Work may not commence until satisfactory RAMS have been submitted, reviewed, and accepted by the R&M site manager.

9.3 Periodic Review of Method Statements

Method statements are subject to the same periodic review cycle as their corresponding risk assessments:

- Reviewed at the start of each new phase or activity to confirm they remain current and relevant.
- Reviewed whenever the corresponding risk assessment is updated.
- Reviewed following any incident, near miss, or enforcement action relating to the activity covered.
- Reviewed if there is a change in personnel, plant, materials, sequence, or site conditions that could affect the method of work.
- Reviewed at minimum every 6 months for ongoing or long-duration activities, regardless of whether any specific trigger has occurred.

All revisions to method statements are version-controlled (revision number and date), and superseded versions are clearly marked as withdrawn. The current version is re-briefed to all affected operatives through a task briefing, with attendance recorded and retained.

10. Specific Assessment Types

In addition to general risk assessments, R&M ensures the following specific assessment types are completed where required:

- **COSHH assessments:** For all substances hazardous to health used on site, including construction products, cleaning chemicals, fuels, and any materials generating hazardous dust or fumes. COSHH assessments reference manufacturer safety data sheets and specify the control measures, monitoring, health surveillance, and emergency procedures required.
- **Manual handling assessments:** For tasks involving significant manual handling risk, following the TILE framework (Task, Individual, Load, Environment). Assessments identify opportunities to eliminate or reduce manual handling through mechanical aids, team lifts, redesign of delivery/storage, and task rotation.

- **Noise and vibration assessments:** For activities likely to exceed the lower exposure action values. Assessments specify exposure duration limits, equipment selection, PPE requirements, health surveillance triggers, and rotation arrangements.
- **Fire risk assessments:** For the site as a whole and for specific hot works activities. Updated whenever the site layout changes, combustible materials are introduced, or the fire escape/assembly arrangements are altered.
- **Environmental impact assessments:** For activities with potential environmental impact, including dust, noise, vibration, water pollution, waste, ecology (protected species, trees, watercourses), and community impact. Assessments specify mitigation measures and monitoring arrangements.
- **Temporary works assessments:** For all temporary works (scaffolding, propping, falsework, shoring, temporary barriers, crane bases), with design checks, inspection regimes, and loading constraints specified.

11. Responsibilities

Thom McKenna, Director:

- Overall accountability for the risk management policy and its implementation.
- Authorisation of corporate and generic risk assessments.
- Annual policy review and approval.
- Ensuring adequate resources are provided for risk management activities.

Jon Scurr, Director of Operations:

- Review and oversight of project-level risk management arrangements.
- Review of corporate risk assessments compiled by the Compliance Officer.
- Quarterly review of the corporate risk register.
- Escalation point for significant risk issues raised by project teams.

Phillip Hollingworth, H&S Adviser (Spectra Safety):

- Compilation of corporate and generic risk assessments.
- Review of project-specific risk assessments compiled by site managers.
- Review of high-risk subcontractor RAMS.
- Investigation of significant incidents and high-potential near misses.
- Delivery of risk assessment training and competence development.
- Monitoring the quality and currency of risk assessments across all projects.
- Advising on legislative compliance and best practice.

Graham Stevenson, Principal Designer (VIEW Architects):

- Compilation and management of the design risk register.
- Ensuring designers fulfil their CDM 2015 duties to eliminate and reduce risks through design.
- Communication of residual design risks to the construction team through the pre-construction information.

Louis Howard, Procurement Manager (Enabl):

- Ensuring subcontractor RAMS are received and reviewed before purchase orders are finalised.
- Including risk management requirements in subcontract terms and conditions.

- Pre-qualifying subcontractors for competence in risk management as part of the supply chain assessment.

Site Managers:

- Compilation of project-specific risk assessments for their project.
- Review and acceptance of subcontractor RAMS.
- Day-to-day management of the project risk register.
- Delivery of site inductions, task briefings, and toolbox talks communicating risk assessment findings.
- Incorporating site issues, near misses, and changing conditions into risk assessments promptly.
- Ensuring method statements are linked to risk assessments and both are periodically reviewed.
- Retaining all briefing and communication records on the project safety file.

Supervisors and Foremen:

- Delivering task-specific briefings based on risk assessments and method statements.
- Ensuring operatives complete point-of-work risk assessments before each task.
- Monitoring compliance with control measures and escalating issues to the site manager.
- Conducting and supporting behavioural safety observations.

All Workers (employees, subcontractors, agency):

- Participating in risk assessment briefings and confirming understanding.
- Completing point-of-work risk assessments before each task.
- Following the control measures specified in risk assessments and method statements.
- Reporting new hazards, changed conditions, and near misses through the available channels.
- Exercising the Stop the Job right whenever they believe conditions are unsafe.

12. Training and Competence

R&M ensures that all persons involved in the risk management process are competent to fulfil their role:

- Site managers receive training in risk assessment methodology, the hierarchy of control, the 5×5 risk matrix, COSHH assessment, and the review process. Training is delivered by Phillip Hollingworth or an external accredited provider.
- Supervisors and foremen receive training in task-level risk assessment (POWRA), dynamic risk assessment, task briefing delivery, and recognising when an assessment needs updating.
- Operative observers receive awareness training in point-of-work risk assessment as part of the site induction, with practical exercises.
- Subcontractor supervisors receive a briefing on R&M's risk management expectations as part of the pre-start meeting.
- Refresher training is provided annually, or sooner if triggered by changes in legislation, process, or poor audit findings.

Training records are maintained by Phillip Hollingworth and are available for audit by clients, framework bodies, and the HSE.

13. Monitoring and Audit

R&M monitors the effectiveness of its risk management arrangements through:

- Active monitoring: site inspections, safety walks, behavioural safety observations, and review of risk assessment currency and quality.
- Reactive monitoring: incident investigation, near-miss analysis, enforcement action review, and civil claims analysis.
- Internal audits: Phillip Hollingworth conducts a programme of internal audits across R&M projects, checking that risk assessments are current, suitable, and sufficient; that method statements are linked and reviewed; that briefing records are complete; and that site issues are being incorporated.
- External audits: R&M's risk management arrangements are subject to audit by Constructionline, SSIP assessors, client representatives, and the HSE. Findings from external audits are acted upon and tracked to completion.

Audit findings and monitoring data are reported to the quarterly management review and inform the annual policy review.

14. Related Policies and Documents

This policy should be read in conjunction with:

- R&M Property Group Ltd Health and Safety Policy.
- Behavioural Safety Programme (RM-BSP-001).
- Mental Health & Wellbeing Policy (RM-MHW-001).
- Drugs & Alcohol Policy (RM-DAP-001).
- Anti-Bullying and Harassment Policy (RM-ABH-001).
- CDM 2015 Arrangements and Construction Phase Plans.
- Subcontractor Pre-Qualification Questionnaire.
- Environmental, Social and Governance (ESG) Policy (RM-ESG-001).
- Carbon Reduction Plan (RM-CRP-001).
- Site Induction Procedure.
- Incident Investigation and Reporting Procedure.

15. Document Review

This policy will be reviewed annually, or sooner in response to:

- Changes in health and safety legislation, HSE guidance, or Approved Codes of Practice.
- Significant incidents, enforcement action, or civil claims.
- Client or framework requirements.
- Findings from internal or external audits.
- Changes in R&M's organisational structure, project portfolio, or construction methods.
- Feedback from the workforce, supply chain, or clients.

Document Owner: Thom McKenna, Director

Approved by: R&M Property Group Ltd Board of Directors

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Next Review: June 2027