COMPANY FINANCIAL PERFORMANCE

The company continued to perform exceptionally well in its sector. Plimsoll, the main independent business performance analyst, placed Turner Access as 7th most profitable and 21st largest by turnover out of the 3000 top Access & Scaffolding companies studied; in their most recent notification dated 14th June 2007 (this report is available if required).

We are proud to have been a finalist in this competition each year since it was inaugurated in 2005 when we were judged as Winner. This was repeated in 2006.

We believe our entry this year outlines a service concept which is original and is very much needed by industry, therefore even better than those of 2005/06 and hopefully important enough from a Health & Safety improvement viewpoint, to be judged as a winner again.

It provides background to a serious problem currently faced by the Construction industry as our competitors in the Scaffolding & Access sector in general, continue to fail to fully embrace WAHR and other statutory requirements. It also identifies what the problems are and offers users, including main contractors and clients, an alternative service through which full compliance is achieved.

THE PROBLEM

1. The Work at Height Regulations requires that when work at height is carried out “collective” protection measures be deployed and “prevention” of the RISK of fall be established. (This applies to scaffolding activity i.e. erection, dismantling and alteration, refer to 6.3 of the said regulations).

2. The Construction Industry (including Scaffolding Specialists and sub-trades) are currently adopting systems of work which:

    a. Do not prevent the risk of fall, or offer collective protection.
    b. Are not being trained to use equipment that offer collective protection nor on how such equipment is incorporated into a safe system of work.

3. The above leaves the user who may be the sub-contractor, their customer who may be the main contractor, and others, who may include the client, all open to a charge of negligence in the event of an accident occurring. With the new Corporate Manslaughter Regulations in mind, failure of this kind can expose all to the risk of criminal litigation.

To understand this fully (it should be remembered that ignorance cannot be used in defence), various statutory regulations including CDM, Management, Work at Height and Manual Handling Regulations, and what they require, need to be understood.

This Entry looks in more detail at the latter two and provides the basis to understand, however all of the said regulations can be directly related to the problem and used in the event of an accident against companies either directly or indirectly involved.

Aluminium Towers are the most widely used form of Scaffolding (System or access equipment) found on construction sites. They are very common and popular with most types of sub-contract trades. PASMA offer 1 day training courses to prove competence and their widespread use continues.

However, whilst two methods of Erection were established by PASMA, in consultation with the HSE, the first of which enabled full compliance of all the Statutory Regulations. The second method known as Through the Trap (3T) is the only method which PASMA training covers. Unfortunately, the 3T method does not comply fully with the Work at Height Regulations (6.3) and it does not remove the “Risk of Injury” due to its non-ergonomic working positioning when considered against the requirements of the Manual Handling Regulations. This would perhaps be justifiable if another system of work was not available that *does* fully meet the statutory requirements. In order to understand this fully, a comparison of the two processes (systems of work) needs to be made.

The attachment provides the comparison and the evidence to support all of the aforementioned. It also provides a solution to the problem. This solution is offered directly by Turner Access or through a network of Turner Access Approved Contractors currently being developed by the company to provide the service geographically throughout the UK.

This involves the company in delivery of unique training that Turner Access has developed on "fall prevention methodology" and is provided to our own personnel as well as to the Approved Contractor network.

Our aim is to improve how Towers are used and **CONTROLLED** on site through improved **ORGANISING** and **PLANNING** and through the **SELECTION** of the most appropriate equipment and process for this important work activity at height.

We hope this initiative will be recognised by the judges of the competition as a significant contribution towards reducing the risk of falls from height and Safety improvement in general.

This concept which we have abbreviated to **'C=OPS'**, after the 4 highlighted words above forms an appropriate acronym.

The three references to follow include a principal client, An Approved Contractor and a CN Awards judge referring to our 2006 entry.

ASDA:
"The Turner COPS Service which we have assessed as "best practice" as required by the "Hierarchy of Measures" in the Work at Height Regulations, removes our exposure".

APPROVED CONTRACTOR:
"Turner Access offer the back up we need to operate with their products and to provide a service which we believe is far superior to Tool Rental companies who simply hire Towers to sites without being directly involved in making sure that they are built and used correctly. We are delighted to be associated with Turner Access and part of their new Approved Contractor Network".

CN JUDGE:
"A clear winner. Their achievements are way ahead of the sector. They won last year on the strength of one major project. This year, we saw more of the company and its culture – and it's brilliant."

Introduction

Problems on Site

Problems occur on construction sites due to a lack of **control** involving the use of mobile towers and other types of access equipment and, consequently, accidents happen, most commonly falls from height. This is a source of major concern to the UK Construction Industry. Falls from height cause more deaths and serious injury than any other form of accident.

Without trained operatives and selection of the most appropriate equipment, accidents are likely to occur.

Safety must be made an essential priority on every construction project. Current legislation places a heavy burden on Management Contractors, Clients and Equipment Users. Failure may expose all involved to the risk of both criminal and civil litigation.

Our Solution

The solution is to gain **control** through **planning** and **organisation** with aluminium towers and other access equipment, making sure they are erected by personnel trained in full Fall Prevention Methodology* and through the **selection** of suitable equipment (the most appropriate) to enable "Collective Protection" to occur, thereby fully complying with the Work at Height Regulations 2005 (Reg 6:3).

**** This type of training is NOT available from PASMA***

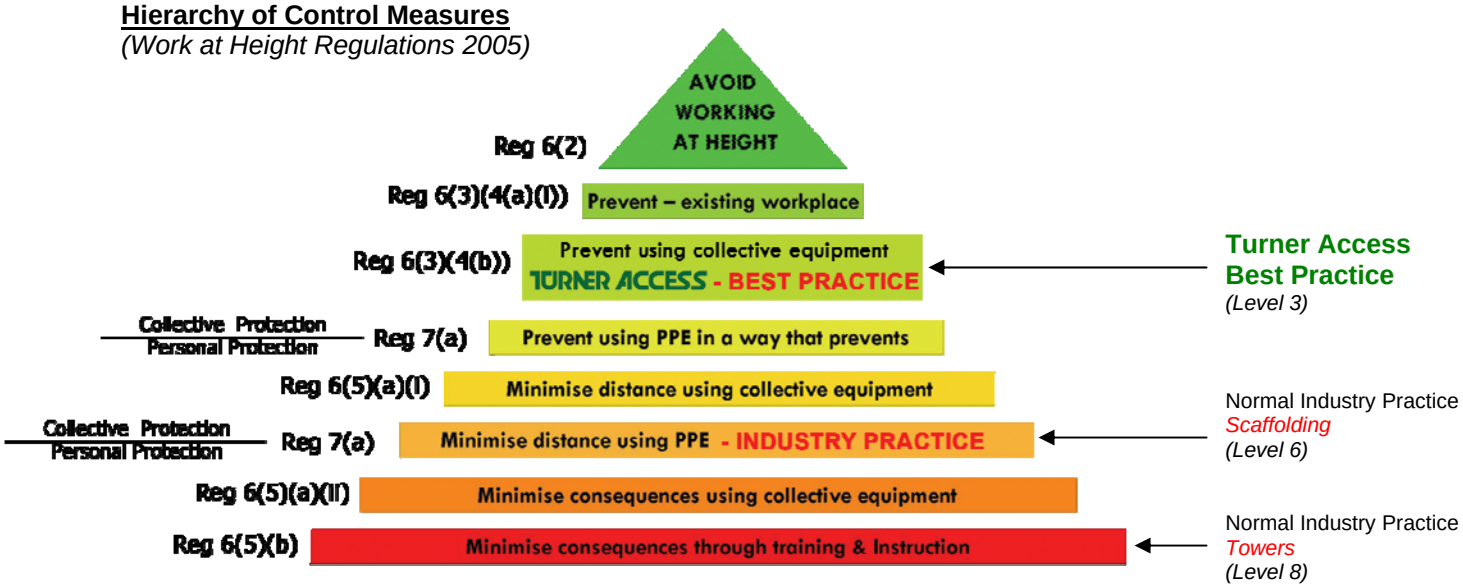
Preventing the Risk of Fall

Work at Height Regulations 2005

The Work at Height Regulations 2005 were introduced to prevent the risk of falls from height.

Best Practice, with regards to the Work at Height Regulations 2005, can be achieved by adopting the highest possible standards as required by the extended objective levels of the Hierarchy of Measures *(see Figure 1)* that form the cornerstones of the UK Work at Height Regulations, introduced in response to the pan-European Work at Height Directive.

Hierarchy of Control Measures
(Work at Height Regulations 2005)

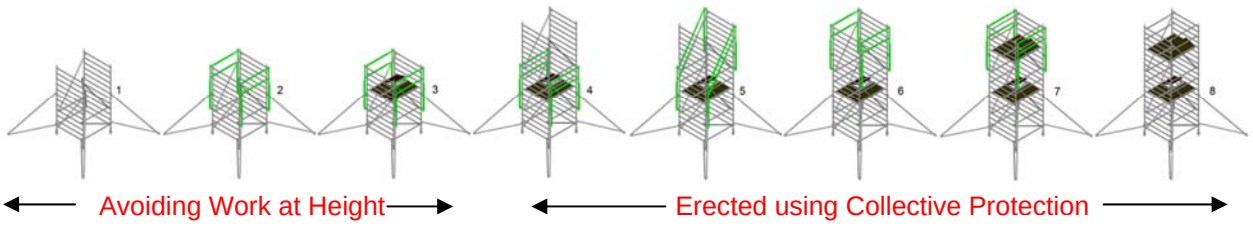


(Figure 1)

Duty holders must make Organisational, Planning and Selection decisions in reference to the hierarchy previously detailed.

These decisions are to adopt a process that PREVENTS the risk of fall, or to adopt a process which does NOT prevent the risk.

Erection Example using the Turner Access Advance Guardrail - Achieving Best Practice (Level 3 Hierarchy of Measures) with the use of Collective Protection Measures *(Figure 2)*.



(Figure 2)

Advance Guardrails highlighted in green for illustration purposes

Safe Tower Assembly, Alteration and Dismantle – Achieving Best Practice

The Turner Advance Guardrail is a revolutionary Fall Prevention System, protecting operatives when they are at their most vulnerable, during tower assembly, alteration and dismantle. For use with towers supplied in accordance with product standard BS EN 1004:2004.

1 set of Turner Advance Guardrails per site may be all that is required (1 Tower = 1 set of Advance Guardrails, 4 verticals plus 4 horizontals). However, 50 towers to be assembled on site can equal 1 set of Advance Guardrails – if **control** is achieved through proper **organisation** and **planning**.

The Health and Safety Executive in combination with PASMA adopted the Turner Advance Guardrail methods in their DVD *Don't Fall For It*, in which Turner Access personnel, equipment and methods are featured. The message from the HSE is clear:
If operatives are to FULLY meet the requirements under the Work At Height Regulations, then Turner Access methods should be followed.

The Turner Advance Guardrail Method is one of two methods recommended by the HSE and PASMA. The other is a method referred to as the 3T Method (Through The Trap). However, can you justify the 3T Method against the Hierarchy (Work at Height Regulations) or with consideration to other regulations such as the Manual Handling Regulations?

As shown in the Hierarchy of Measures, the 3T Method sits at the lowest level (Level 8), while the Work at Height Regulations state that Collective Measures should be used.

While selecting the most appropriate method of Tower Assembly, consideration should also be given to the Manual Handling Regulations which require the risk of injury be removed.

3T Method states that the operator should be positioned through the platform with the lower back resting against the deck *(Figure 3)*.

In Figure 4, consider the ergonomics. The position of the 3T Operator shows twisting and stretching of the body. The operator's feet are at a 90° degree angle to his arms.

(Figure 3)

Also, consider what happens when the operator is shorter than average height. The far right picture in Figure 4 shows an image of the operator having to stretch to fit the guardrail from this position, while relying on only one foot supporting him. From this position the operator has no fall protection and is in danger of his feet slipping, particularly if the conditions are muddy or wet.




(Figure 4)

Tower Assembly Comparison Summary
Only <u>one</u> method meets the highest possible measure in the Hierarchy of Measures:

1. The 3T method is positioned at the lowest possible level in the Hierarchy of Measures.

2. The Manual Handling Regulations, with respect to work positioning and other Regulations, should also be considered.

3. In choosing between the two methods, the duty holder shall justify the method and equipment selected through risk assessment. This is important not only before but crucial **<u>after</u>** an accident when the risk assessment will be studied.

Duty Holder Choice

Method	**Justification**
Turner Advance Guardrail	Complies **FULLY**
3T (Through The Trap)	**Justifiable?** Consider aforementioned points and justify if possible through risk assessment
Other processes for erection of aluminium towers	**<u>NOT</u>** justifiable

Turner Access strongly recommends the use of their Advance Guardrail method on all sites.

Achieving Control on Site

To achieve full Fall Prevention Methodology and Best Practice Systems of Work, there is only one appropriate option for the assembly, alteration and dismantle of towers – Advance Guardrails.

Selecting the most appropriate equipment from Turner Access and adopting Best Practice Systems of Work with properly trained operatives, **control** on site can be achieved – all you have to do is **organise** and **plan** accordingly – **"C=OPS"**

By achieving control, the risk of accidents and potentially fatal falls from height can be eliminated.