



# HEALTH, SAFETY AND LOSS CONTROL POLICY

**CONTROLLED**

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## DEFINITIONS

**General risk assessments** - Cover an area, a process or an entire site. They focus on general risks associated with these areas and do not concentrate on the risks posed by specific tasks or activities.

**Job/Activity Risk Assessments** – *Cover the risks associated with specific activities or tasks. They therefore focus on the risks that jobs or tasks create and are generally undertaken in addition general risk assessments.*

**Generic Risk Assessments** – *Are risk assessments either general or job/activity which are written to cover multiple sites or areas.*

**Specific Risk Assessments** – Again these are risk assessments that are either general or job/activity which cover specific sites or specific activities in specific areas.

**Persons in Authority** – Personnel with managerial responsibility for an operation or areas including directors, line managers, supervisors and charge hands.

**CDG** – Carriage of dangerous goods

**SHE** – Safety health and environment

**SSW** – Safe system of work



**SWL** – Safe working load

**COMAH** – Control of Major Accident Hazards Regulations

**COSHH** – Control of Substances Hazardous to Health

**DGSA** – Dangerous Goods Safety Advisor

## 1. Policy Statement

|   |   |
|---|---|
| Type: Company Policy  | Number: P (HS)  |
| Title: Group Health, Safety & Loss Control Policy   | Applies to: All Group   |
| Originator<br> | Authorised by<br> |
| Group H & S Manager   | CEO   |
| Date: 04/7/19   | Review: 7/21  |

### 1. Health, Safety and Loss Control Policy Statement

#### 1.1 Recognition

Cumbria County Holdings, incorporating Cumbria Waste Management Ltd, Cumbria Waste Recycling Ltd, Lakeland Waste Management Ltd, Lakeland Minerals Ltd, Orian Facility Management Ltd, Orian Property Services Ltd, recognises both its moral and its legal obligations to provide workplaces, plant and systems of work that are safe. The company also recognises that these obligations are applicable to all employees, contractors, visitors and others who may be affected by the organisation's activities.

The company understands that effective health & safety management contributes to improved business performance by minimising the financial losses associated with accidents and other unplanned events. The company has therefore established the principal that **HEALTH & SAFETY IS GOOD BUSINESS.**

#### 1.2 Company Commitments

The company is committed to:

1. Providing safe and healthy working conditions for the prevention of work related injury and ill health which is appropriate to the purpose, size & context of the organization and to the specific nature of its OH&S risks and OH&S opportunities.
2. Provide a frame work for setting OH&S objectives. Providing all resources that may be necessary to adequately implement, maintain and improve this policy.
3. Fulfil legal requirements and other requirements which are applicable to the Company..
4. To eliminate hazards and reduce OH&S risks pertinent to the Company's operation.
5. To continually improve the OH&S management system.
6. To consultation and participation of workers and workers representatives. Organising and maintaining both company wide and local safety committees involving employees from all levels of the organisation.
7. To make the policy available as documented information which is communicated within the organization and made available to interested parties where required.
8. To ensure the policy remains appropriate and relevant and to take steps where is no longer the case through audits, safety inspections and other proactive measures..

9. Ensuring that all persons in authority recognise their responsibility and adequately implement this policy and make its contents known to all company employees and all persons entitled to use the company's facilities.
10. Responding to all areas of identified failure, taking appropriate action to minimise potential losses and ensure action is taken to prevent reoccurrence.
11. Fostering a culture of team spirit between all concerned to remove or reduce the element of risk before failure occurs.
12. Providing all training, instruction, awareness and supervision as is necessary to ensure all employees are competent to undertake all tasks required of them and that they demonstrate a positive attitude towards failure prevention.
13. Providing employees with prompt and sufficient feedback on health and safety issues arising e.g. in response to meeting items, near miss and hazard reports and protect works from reprisals when reporting incidents, hazards, risks and opportunities.
14. Ensuring that employees are aware of their legal obligations regarding health & safety and that appropriate action is taken against employees who through their actions endanger others by wilful damage, horseplay, deliberately disregarding rules and not reporting incidents or damaged plant.



Chief Executive Officer

## 2. Scope

Cumbria Waste Management Group is wholly owned by Cumbria County Council.

Cumbria Waste Management Ltd operates two non-hazardous landfills located at Hespian Wood near Carlisle and Flusco near Penrith. The Flusco Landfill is managed as a partnership with its sister company Lakeland Waste Management. These sites receive domestic waste for disposal. The Hespian Wood site also has a construction waste recycling facility where soils are graded and stones crushed to create re-usable materials for the construction and road laying industries. A Landfill at Distington has recently closed and the site now operates a Material Recycling Facility (MRF). The Flusco and Hespian Landfills also operates a MRF and both Hespian Wood and Distington have baling facilities.

The company also manages fourteen House Hold Waste Recycling Centres, previously know as Civic Amenity sites, for Cumbria County Council. These are located at Bousteads Carlisle, Brampton, Wigton, Maryport, Clayflatts Workington, Frizington, Millom, Barrow in Furness, Grange over Sands, Ulverston, Ambleside, Kendal, Kirkby Stephen and Flusco near Penrith. They provide a facility for the public to recycling paper, wood, cardboard, garden waste, glass, general waste, car and domestic batteries, waste oils, gas cylinders, florescent light tubes, small quantities of chemicals and paints and on some sites books, clothing and hard bonded asbestos.

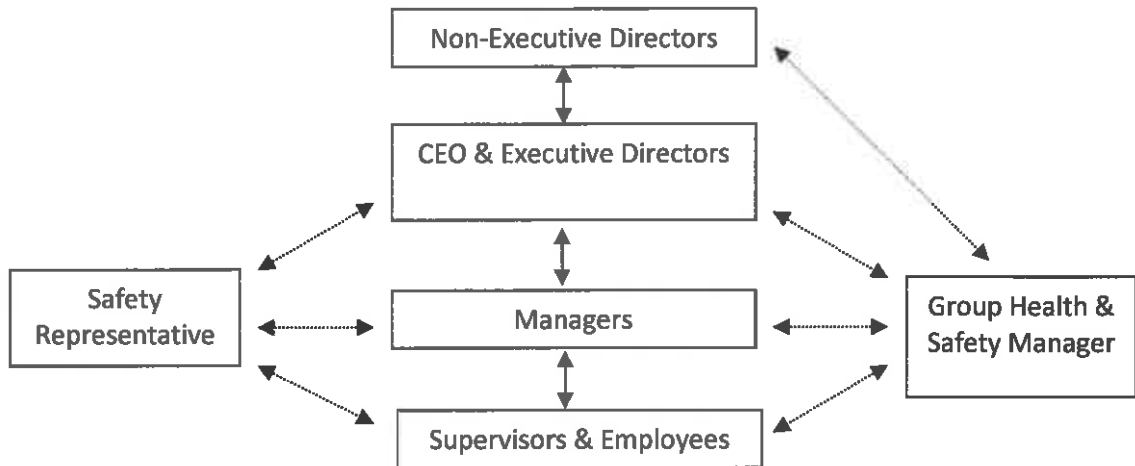
Cumbria Waste Recycling manages the collection and transport operations for the Group including those operated as Trotters Dry Waste. Fleet and skip maintenance management are operated from the Kingmoor site with some of the daily West Cumbria transport activity being operated from Distington. These are used at both the Household Waste Recycling Centres and at commercial clients. The fleet service collects the full skips and takes them for recycling or disposal at Landfill. They operate a facility at Kingmoor, in Carlisle, which is limited to an office operation and to a maintenance workshop.

Lakeland Minerals Ltd operates a sand and gravel quarry based near Brampton. The operation entails extraction of sand using loading shovels and excavators, the grading, stockpiling and loading.

### 3. Organisation and Responsibilities

#### 3.1 Organisation

The following organisation relates to health & safety management within the company.



#### 3.2 Responsibilities

The persons detailed below have the following responsibilities in terms of health and safety.

##### 3.2.1 All Directors

1. Supporting the policy and the loss control programme by ensuring that all Directors have defined responsibilities for its implementation and that adequate resources have been allocated.
2. Reviewing the policy as often as is necessary to ensure the company's aims are being achieved.

##### 3.2.2. Chief Executive Officer

1. Having overall responsibility via the company's organisational structure for the establishment, implementation and the ongoing maintenance of this policy, in accordance with OHSAS 18001, throughout the company.
2. Acting as the director responsible for health and safety and ensuring health and safety is given adequate time, commitment and resource at board level.
3. Ensuring the annual accounts of the company make reference to health, safety and loss control where required.
4. Ensuring that all company activities either ongoing or intended that can have a significant effect in terms of health and safety are suitably considered by the Board.
5. Ensuring that reports on the performance of the OH&S management system are presented to the board for review and as a basis for improvement of the OH&S management system.
6. Appointing a competent person or persons in relation to health & safety and ensuring their activities meet the requirements of this policy.
7. Ensuring the involvement of employees at all levels of the organisation in health and safety management.



8. Having an active involvement in periodic reviews of the OH&S management system, setting objectives and on the overall performance of the OH&S management system.
9. Exercising suitable awareness of professional limitations both individually and of all staff in relation to health and safety.

### **3.2.3 Executive Directors**

1. Ensuring the implementation of this policy in all areas under their control and ensuring that all significant risks have been identified and eliminated or adequately controlled.
2. Allocating sufficient resources to implement this policy within all areas under their control.
3. Considering the health and safety implications of all new projects, developments, business proposals and procurements to ensure the requirements of this policy are met.
4. Communicating this policy and ensuring the competence of all persons under their control to all assigned tasks.
5. Advising the Managing Director of any loss control issues which may affect the company's OH&S management systems.
6. Ensuring the involvement of employees at all levels of the organisation in the process of health and safety management.
7. Ensuring feedback in relation to health and safety is maintained at all levels.
8. Exercising suitable awareness of professional limitations of both themselves and their staff in relation to health and safety.

### **3.2.4 Managers with Staff**

1. Ensuring that suitable and sufficient risk assessments are undertaken in all areas under their control.
2. Managing health & safety effectively using suitable safety action plans.
3. Ensuring that health and safety is considered in all business decisions where required.
4. Implementing adequate arrangements via a safety action plan for maintaining statutory inspections and records.
5. Ensuring competence of staff by providing adequate information, instruction, training and supervision in order to meet requirements.
6. Encouraging and supporting safety representatives and committees with the performance of their duties.
7. Reporting to the Directors and senior managers all incidents and loss making events including near misses.
8. Taking all corrective actions that may be required to limit potential losses after incidents have occurred.
9. Investigating all incidents and loss making events with a view to implementing preventive actions.
10. Carrying out proactive monitoring required to implement the policy detailed in site safety action plans.
11. Advising the Directors and senior management on any potential loss making issues.
12. Taking an active part in the policy review process.
13. Ensuring feedback in relation to health and safety is maintained at all levels.
14. Exercising suitable awareness of professional limitations of both themselves and their staff in relation to loss control.

### **3.2.5 Commercial Manager, Sales Manager and Sales Representatives**

1. Carrying out suitable risk assessments to ascertain any hazards in relation to client's premises/incoming wastes or hazards in relation to proposed CWG external activities that could affect the company, its personnel and others during the course of contracts.
2. Liasing with clients to establish suitable control measures and procedures to deal with risk arising during the course of proposed contracts.
3. Ensuring where company generic safe systems of work are not adequate to eliminate or reduce risk to acceptable levels, that further controls are applied via risk assessment and method statement.
4. Ensuring that the Operations Departments are aware of identified control measures including procedures applicable to client sites.
5. Ensuring that adequate assessments are made of all waste streams to ensure compliance with current Carriage of Dangerous Goods (CDG) by Road and Hazardous Waste and Duty of Care legislation.
6. Exercising suitable awareness of their own professional limitations and the limitations of others who may be required to undertake the work.
7. Ensuring that under no account will people, the environment and thus the company's business be subjected to unacceptable levels of risk.

### **3.2.6 Environmental Manager**

1. Ensuring that health, safety and loss control are given adequate consideration in all decisions of site environmental development and regulation.
2. Exercising suitable awareness of professional limitations in relation to health and safety.

### **3.2.7 Group Health & Safety Manager**

1. Assisting directors and senior managers with health, safety and loss control issues and to aid in the formulating and review of policy including changes in legislation.
2. Assisting in ensuring that significant risks which threaten the business are adequately identified, eliminated or controlled.
3. Assisting in ensuring that suitable procedures to control risk are issued and co-ordinating their implementation throughout the company.
4. Proactively monitoring through audits, inspections and reports the implementation and effectiveness of this policy.
5. Monitoring through the analysis and investigation of incidents and other evidence of deficient performance, the implementation and adequacy of this policy.
6. Ensuring that reports on the performance of the OH&S management system are presented to directors and senior management for review and as a basis for improvement of the OH&S management system.
7. Investigating and thus advising on suitable controls to ensure that all loss making events are minimised as far as possible in a cost effective manner.
8. Establishing and maintaining good communications with enforcement agencies, customers, suppliers, management, staff and other applicable parties in the interests of health and safety.
9. Carrying out relevant research to ensure sufficient information is available to enable adequate training to occur.
10. Acting as a competent advisor in all aspects of the policy review process.
11. Exercising suitable awareness of their limitations in relation to health and safety.

### **3.2.8 Supervisors and Chargehands**

1. Ensuring awareness and communication of this policy to all employees.
2. Ensuring that risks within operations under their control are eliminated or adequately controlled.
3. Ensuring all employees, contractors and visitors obey all safe systems of working and behave in a safe and responsible manner.
4. Providing information, instruction, training and to supervise employees to ensure health & safety procedures are being applied.
5. Ensuring sufficient time is allocated for safety inspections, toolbox talks and corrective actions required of them in safety action plans.
6. Getting actively involved in the policy review process.
7. Advising site management of any incidents, near misses or defects which may affect the safe operation of the sites.
8. Being aware of their own professional limitations and that of others under their control.

### **3.2.9 Employees**

1. Being aware of the company's policy and procedures and to co-operate with their implementation.
2. Ensuring that all risks present during their activities have been effectively eliminated and controlled.
3. Reporting significant hazards, accidents, near misses or defects to supervisors/management promptly.
4. Complying with all procedures, control measures, rules and ensuring specified PPE is worn and maintained.
5. Not endangering the health, safety and welfare of others due to their acts or omissions.
6. Appointing by consensus safety representatives to represent them.
7. Being aware of their limitations when undertaking work.

### **3.2.10 Safety Representatives**

In addition to the responsibilities of employees, safety representatives will be responsible for:

1. Co-operating with management, regulatory bodies, contractors and other employees to ensure that workplaces are safe within the framework of health & safety law.
2. Carrying out safety inspections and representing the interests of employees in accident and incident investigations.
3. Representing the interests of employees in policy review meetings.
4. Championing the cause of health and safety in relation to the culture and attitude of fellow employees.

## 4.0 Arrangements, Planning & Implementation

The following measures will be implemented to meet the requirements of the policy.

### 4.1 OH&S Management System

CWG will organise its health & safety management system around the following management model: -

- policy
- organisation and responsibilities
- arrangements, planning, implementation
- measuring performance
- reviewing performance
- auditing

Details of this process will be highlighted throughout this section.

#### *References*

- *Management of Health and Safety at Work Regulation & Approved Code of Practice*
- *OHSAS 18001/18002*

### 4.2 Funding

Directors will ensure that adequate resources have been allocated for the implementation of this policy in all operational budgets.

In addition to this the Managing Director will ensure that the Health & Safety Manager is given sufficient resources to allow sufficient training aids, training, hardware/software and specialist advice and publications to be procured to meet the safety practitioner's obligations under the policy.

#### *References*

- *Management of Health and Safety at Work Regulation & Approved Code of Practice*
- *OHSAS 18001/18002*

### 4.3 Goals

Goals and objectives will be established based on legal and other requirements, the company's risk assessment, and technological options, financial, operational and business requirements.

The Management review meeting will set, monitor and record the goals. Goals and objectives for the management system will be consistent with the company's Health and Safety Policy and promote continual improvement. Programmes will also be established to achieve the objectives. These are controlled via meeting minutes and a corrective action database.

Goals will be set for the following areas where possible/required:

a) Proactive

- Safety inspections, personnel, plant and equipment
- Audits
- Risk assessment/safe system of work (SSW) targets and reviews
- Health surveillance and COSHH monitoring
- Safety tours
- Emergency procedure exercises
- Employee involvement
- Training
- Risk improvement projects
- Awareness campaigns
- Culture initiatives
- Toolbox talks

b) Reactive

- Incident Investigations
- Near miss reporting
- RIDDOR incident rates
- RIDDOR and injury frequency rates
- Severity rates and mean duration rates
- Injury and incident types
- Injury rates for individual employees
- Internal and external benchmarking

The Management Review committee will ensure that goals are realistic and achievable and that progress is fully reviewed at every meeting. Other goals will be implemented when deemed required.

*References*

- *Management of Health and Safety at Work Regulation & Approved Code of Practice*
- *OHSAS 18001/18002*

#### **4.4 Risk Assessment**

All significant risks associated with company activities will be assessed using the process detailed in the company standard for risk assessment.

Hazard identification, risk assessment and risk control processes are carried out as proactive measures, rather than reactive measures, i.e. they should precede the introduction of new or revised activities or procedures.

Risk assessment results may identify additional corrective or preventative actions are required. Where this is the case the necessary actions will be logged in the corrective actions database where they will be monitored for a timely completion.

Risk assessment must take into account all routine and non routine activities, including those of non employees who have access to the site. Human behaviours,

their capabilities and individual characteristics which influence behaviour at work in a way which can affect health and safety. Hazards identified originating outside the workplace, which are capable of adversely affecting the health and safety of workers must also be assessed.

Workers involved in, and with experience of, the tasks are involved in the risk assessment process.

The results of risk assessments will be reviewed as part of the management review process and may be used for establishing revised or new OH&S objectives.

#### **4.4.1 General Site Risk Assessments**

Specific risk assessments will be undertaken at all company workplaces as follows:

- Head office
- Hespin Wood Landfill, Aggregate Facility and MRF
- Kingmoor
- Transport Operations
- Flusco Landfill and MRF
- Distington MRF
- Distington Transfer Station
- Household Waste Recycling Centres
- Kirkhouse Quarry
- Any future CWG sites

The objective of these risk assessments is to identify hazards in all workplaces and evaluate risk in order to eliminate or reduce significant risks so far as is reasonably practicable. General site risk assessments will also identify where individual job/task risk assessments, method statements and safe systems of work are required to achieve these aims. These risk assessments will also be used to establish site rules and to produce Site Specific General Rules.

General site risk assessments will be formally reviewed at least every two years or every time deficiencies have been established via active and reactive monitoring. They will be controlled via the company's documentation control procedure.

#### **4.4.2 Job/Task Specific Risk Assessments**

Every individual task or related groups of tasks will be individually risk assessed if they pose significant risk and if controls have not been adequately implemented via the general site risk assessments.

For one off irregular work, risk assessments will be undertaken by the manager concerned and controlled locally. In cases of complex work activities, method statements will be produced. The manager responsible will review these assessments prior to undertaking the work subsequently or after failures have occurred.

Common routine activities will be risk assessed by an appointed manager and controlled centrally by incorporation into working instructions. These risk assessments may be generic if the activities are undertaken at multiple sites. In all

cases of generic assessment, individual managers will risk assess generic working instructions in relation to specific working areas, applying extra controls where required. Working instructions will be reviewed at least every two years, after failures have become evident, or faults found with proactive and reactive monitoring.

#### *References*

- *Company Procedure – CP001 Documentation Control*
- *Company Procedure – CP002 Risk Assessment*
- *Management of Health and Safety at Work Regulations & Approved Code of Practice*
- *OHSAS 18001/18002*

#### **4.4.3 COSHH Assessments**

COSHH assessment requirements will be detailed in the company procedure on COSHH. In more simple cases COSHH assessment can be carried out as part of the general risk assessment procedure i.e. 4.4.1, 4.4.2.

All substances, solid, liquid, vapour, fumes or gas that pose risks to health or the environment will be assessed. Substances will fall into the following key areas: -

- **Company produced products**
  - landfill gas
  - leachate
- **hazardous wastes**
- **non- hazardous wastes**
- **dusts**
- **process materials**
  - paints, solvents
  - water treatment chemicals
  - cleaning fluids, etc

NB, required health surveillance and COSHH monitoring will be detailed in sections 4.10.3 and 4.10.4.

#### **Company Produced Products**

Formal COSHH assessments will be undertaken for landfill gas and leachate. These will be undertaken in a generic format detailed in the COSHH procedure and controlled centrally. These will be referenced by personnel when undertaking general risk assessments in 4.4.1 and 4.4.2.

#### **Hazardous Wastes**

Because a definitive inventory of what hazardous wastes may be delivered to sites is impossible to determine (i.e. can be anything within the scope of disposal site licences) COSHH assessments will be undertaken on 'generic groups' of waste and controls implemented. Waste specific COSHH assessments will be undertaken for specific waste streams, where required, and any controls over and above the controls detailed in the generic band assessment will be highlighted and implemented. Further details to be found in the company procedure CP003 COSHH.

## Non-Hazardous Wastes

Generic COSHH assessment will be produced for non-hazardous wastes as for company produced products.

## Process Materials

All process materials posing significant risk will be assessed by one of the methods detailed in this section and suitable controls will be implemented.

### *References*

- *Company Procedure – CP003 COSHH*
- *Company Procedure – CP002 Risk Assessment*
- *Control of Substances Hazardous to Health Regulations and its Approved Code of Practice*
- *OHSAS 18001/18002*

#### **4.4.4 Noise Assessments**

The company will ensure that noise levels within its workplaces are kept as low as is reasonably practicable. The company is committed to the policy of reducing levels of noise in all its workplaces to levels below the first action level where it is reasonable to do so. Sites are reviewed during audits by the H&S Department and any areas / activities where noise sources are identified which may exceed the 1<sup>st</sup> action level are highlighted to the Group H&S Manager. He will review the situation and if necessary arrange for a suitable noise assessment to be undertaken.

Where required then Noise surveys will be undertaken at least every two years in all areas where persons may be exposed to levels above the first action level.

Results will be documented in all cases and identified actions implemented.

### *References*

- *Noise at Work Regulations*
- *OHSAS 18001/18002*

#### **4.4.5 Fire & Explosion Risk Assessments**

Formal fire risk assessments will be undertaken on each site annually. The complexity of the assessments will be dictated by the nature of the sites and be determined by the Health and Safety Manager. Assessments will also be reviewed after failure occurs.

The company will ensure that workplaces storing flammable liquids and LPG will do so in a suitable manner to limit risk.

### *References*

- *Fire Risk Assessments & Fire Prevention Plans*
- *The Regulatory Reform (Fire Safety) Order*
- *Dangerous Substances and Explosive Atmospheres Regulations.*
- *OHSAS 18001/18002*



#### **4.4.6 Transportation of Hazardous Wastes and Dangerous Goods**

No special wastes or dangerous goods will be transported by the company or agents acting on the company's behalf without the arrangements for the proposed transportation being assessed and approved by a company appointed Dangerous Goods Safety Advisor. Dangerous goods safety advisors will satisfy themselves that transportation arrangements in terms of the suitability of packaging, containers, vehicles, classification, placarding and labelling, documentation and driver competence are adequate to meet the requirements of current special waste and dangerous goods transportation legislation.

##### *References*

- *Environmental Protection Act*
- *Hazardous Waste (England & Wales) Regulations*
- *Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations*
- *CLP*
- *OHSAS 18001/18002*

#### **4.4.7 Risk Assessment Training**

The company will ensure through internal and external training that all relevant risk assessors will be competent to undertake all risk assessments, COSHH assessments and dangerous goods assessments required of them.

#### **4.5 Site Specific General Rules**

These will detail the organisation, responsibilities and arrangements for implementing the company's health and safety policy at a local level. They will include local details of: -

- Induction and training
- First Aid
- Fire Arrangements
- Incident Reporting
- Visitor and Contractor Control
- Work Equipment Inspection / Maintenance & Statutory Inspection
- Monitoring and Job Safety Assessment
- Facility checks
- H&S Consultation
- H&S Contacts
- Risk assessment and SSOW
- Personal Protective Equipment
- H&S information
- H&S performance
- Equipment Hire
- Housekeeping
- Hazardous substances
- Emergency Contact

Site Specific General Rules will be formulated specifically for local requirements by Site/Area Managers and agreed via consultation with the Director / Senior Manager responsible for the site/area. General Rules will be controlled centrally via the documentation control procedure and monitored by senior management and directors. Employees will be trained on the general rules.

#### **4.6 Procedures and Safe Systems of Work**

All documented procedures will be risk assessment based, see section 4.4. The following types of procedures will be applicable to company activities.

##### **4.6.1 Company Procedures**

Detail specific procedures that the company has in place to address areas of critical activity and will take the form of internal codes of practice i.e. COSHH, risk assessment, training, environmental impact assessment etc.

##### **4.6.2 Company Working Instructions**

See section 4.4.2.

##### **4.6.3 Individual Risk Assessments and Method Statements**

See section 4.4.2.

##### *References*

- *Company Procedure – CP001 Documentation Control*
- *Management of Health and Safety at Work Regulations & Approved Code of Practice*
- *OHSAS 18001/18002*

#### **4.7 Legislation and Guidance**

Suitable access to applicable legislation and standards will be provided by the company in order for personnel to meet the requirements of this policy. Legislation and standards will be: -

- Held in a company library in Head Office
- Issued to site where required
- Posted on the H&S section of the Company Intranet

All forms of legislation, guidance and standards used by the company will be controlled.

A summary of the applicable legislation and other relevant information is maintained in section 5. The Group H&S Manager shall maintain this summary and keep it up to date. He will review this document every 6 months following 'Common Commencement Dates'.

Sources to information include but are not exclusive to;

- HSE Website & Local Office
- HSE email alert system
- IOSH
  - Membership
  - CPD events
  - Branch meetings
  - Monthly IOSH magazine
  - Email alert
  - Website
- South Cumbria Occupational Health & Safety Group
  - Meetings
  - News letters
- The Chartered Institute of Waste Management
  - Waste industry specific H&S guidance
- Waste Industry Safety and Health
  - Committee Members
  - Website
  - Guidance
  - Emails
- HSE & HMSO Books
  - Statutes, regulations, ACOPS, guidance and information
- Environmental Services Association – H&S Committee
- International Institute of Risk and Safety Management IIRSM
  - Membership, monthly magazine, helpline
- Institute of Fire Engineers
  - Membership
  - Magazine
  - Website
  - Email
- Professional development training courses (various)
- British Aggregates Association
  - Membership
  - Email
- Safe Quarry Alert email
- Insurers

Changes are communicated to relevant managers by the H&S department;

- Through management and H&S meetings
- Providing copies of revised legislation & supporting guidance
- Through training / workshops on new / amended legislation
- Via new / amended procedures and tool box talks

#### *References*

- *Company Procedure – CP001 Documentation Control*
- *Management of Health and Safety at Work Regulations & Approved Code of Practice*
- *OHSAS 18001/18002*

## **4.8 Training, Instruction and Culture**

### **4.8.1 Training**

Training needs, competencies, are identified for each job role. A central record is maintained which logs all individual training, identifies gaps in training achieved and monitors refresher training needs.

Training will be divided into two forms

- Professional training
- Training on risk assessments and safe working procedures

#### *Professional Training*

Professional training will be identified by risk assessment, see section 3.4 and controlled via training matrices applicable to each site/operation.

The Group HR Manager controls the employee files. Copies of professional training are retained in their personnel files and in the central file held in the Head Office.

#### *Risk Assessments/Safe Working Procedures Training*

Site management will train all applicable site personnel on relevant control measures applicable to operatives and contractors where required using procedure instruction records. Refresher training will occur every two years or after controls have been changed due to incidents, proactive monitoring and significant process changes.

Instruction records will be kept on site and a copy forwarded to the Health and Safety Administrator for control centrally.

### **4.8.2 Instruction**

Comprehensive site rules will be produced for all relevant sites. These rules will be listed in a form of signs at all weighbridges and in the form of pamphlets. A copy of the site rules will be issued to all site staff, contractors and visitors accessing company sites.

Adequate health & safety signage will be posted in all required areas on all CWG sites.

All relevant Risk Assessments, COSHH Assessments and Safe Working Procedures will be available in all workplaces in a manner to allow all lawful visitors free and unlimited access to their contents.

A Drivers Handbook will be issued to all Collection Division. Training in the form of toolbox talks will be given on the contents of the handbook as required.

#### 4.8.3. Training Assistance

Assistance is provided for those whose 1<sup>st</sup> language is not English and those who have poorer literacy skills. This will involve using picture board training supplements and, for external exams, reading the questions to candidates. In the rare occasions where foreign workers have poor written and oral comprehension then a foreign translation of exam papers will be sort, where these are available. Where these are not available then assistance in the form of a translator will be made available to them.

##### *References*

- *Company Procedure – CP001 Documentation Control*
- *Company Procedure – CP002 Risk Assessment*
- *Company Procedure – CP003 COSHH Assessment*
- *Toolbox Talk Manual*
- *Site Specific General Rules*
- *Generic Risk Assessments*
- *Health and Safety at Work Act*
- *Management of Health and Safety at Work Regulations & Approved Code of Practice*
- *OHSAS 18001/18002.*

#### 4.8.4 Safety Culture

A system of safety toolbox talks will be devised and given to all employees in occupations involving significant risk. Details on frequencies can be found in site Specific General Rules.

Toolbox talks will originate from the following sources: -

- Generic toolbox talk manual
- Specific talks drafted by management on specific topics (i.e. after incidents)
- Talks on risk assessments, SSW and other controls

In addition to this the following measures will be taken to establish a safety culture: -

- Safety committees and safety reps
- Employee appraisals

##### *References*

- *Toolbox Talk Manual*
- *Management of Health and Safety at Work Regulations & Approved Code of Practice*
- *OHSAS 18001/18002*

## **4.9 Supervision**

The requirements of supervision will be determined by risk assessment, see section 4.4, and may be applicable to sites, areas, individual jobs and processes.

Directors, senior managers and site management should ensure sufficient resources are allocated for supervision when required.

### *References*

- *Generic and Specific Risk Assessments*
- *Site Specific General Rules*
- *Health and Safety at Work Act*
- *Management of Health and Safety at Work Regulations & Approved Code of Practice*
- *OHSAS 18001/18002*

## **4.10 Proactive Monitoring**

The following systems for proactive monitoring will be undertaken to assess the adequacy of the policy and implemented control measures.

### **4.10.1 Safety Inspections**

Safety inspections will be primarily carried out by site management, supervisors and safety representatives with formats and frequency agreed and controlled via Site Specific General Rules. Safety inspections will be undertaken to assess compliance with this policy and subsequent safe working procedures for the following key areas:

- Personnel
- Plant
- Contractors
- Visitors
- Workplace
- Operations on customers sites (transport)

Monthly Facility Checks will be passed to the Health & Safety Department for review.

### **4.10.2 Audits**

The Group Health & Safety Manager will create a suitable internal audit program and schedule based on company policy, procedures, approved Codes of Practice and HSE guidance. Audit frequencies, depth and planning will be based on risk. The company's insurers and external consultants will be invited to audit the company's management system when required.

Non conformance records are retained by the local site and the Group Health & Safety Department. Corrective actions are logged in the corrective action database and allocated to specific managers for action.

The findings and recommendations will be brought to the attention of the Board as part of the Management Review, Board meetings and safety committees for review when required.

#### **4.10.3 Health Surveillance**

Occupational Health Consultants will be appointed to give advice, undertake pre-employment health screening and carry out health surveillance, all records will be retained for forty years.

All operational company employees will be given:

- Pre-employment health screening
- Annual medical (when identified in risk assessment)
- Hepatitis A, B and Tetanus vaccinations (where handling wastes or leachate) where recommended by Occupational Health.

#### **4.10.4 COSHH Monitoring**

Specialist consultants will be appointed to undertake appropriate monitoring when deemed required by the Group Health & Safety Manager. For example, employees exposed to hazardous wastes or excessive dusts or bioaerosols or weld fume in the workplace.

#### **4.10.5 Hazard Reporting Schemes**

The Health & Safety Manager will devise a hazard reporting scheme for the company. The schemes will be controlled by the site specific general rules.

#### **4.10.6 Statistics and Reports**

The Health & Safety Department will maintain statistics and produce reports on proactive monitoring.

##### *References*

- *Company Procedure – CP002 Risk Assessment*
- *Company Procedure – CP003 COSHH*
- *Company Procedure – CP015 Internal Audits*
- *Company Procedure – CP016 Health Surveillance*
- *Site Specific General Rules*
- *Management of Health and Safety at Work Regulations & Approved Code of Practice*
- *Noise at Work Regulations*
- *OHSAS 18001/18002*

#### **4.10.7 Equipment Maintenance**

Records of maintenance are kept at site level. Equipment needing calibration will be calibrated in accordance with laid down schedules. Records of calibration are kept at the local sites and a central database is also maintained by the health and safety department.

##### *References*

- *Generic and Specific Risk Assessments*
- *Site Specific General Rules*
- *Health and Safety at Work Act*
- *Management of Health and Safety at Work Regulations & Approved Code of Practice*
- *Provision and Use of Work Equipment Regulations*
- *OHSAS 18001/18002*

#### **4.11 Reactive Monitoring**

The company will maintain the following systems for the reactive monitoring of its health & safety performance:

##### **Incident Reporting**

Accident books will be maintained at all company sites and management will ensure that all injuries are recorded.

All incidents must be verbally reported to the Director Responsible and the Group Health and Safety Manager, or assigned member of the H&S Team in his absence, within **1 hour** of an incident occurring

All incidents and near misses will be recorded on an internal company report form by the manager concerned and forwarded to the Health & Safety Department and Director/Senior Manager responsible for the facility within four working days.

The Group Health & Safety Manager will ensure company obligations are maintained under RIDDOR.

##### *References*

- *CP039 Reporting, Recording and Investigation of Incidents*
- *Site Specific General Rules*
- *Generic and Specific Risk Assessments*
- *Site Specific General Rules*
- *OHSAS 18001/18002*



## **Incident Investigations**

All accidents, incidents and near misses will be investigated by site management to determine and implement corrective/preventive actions. Management will aim to determine the root causes of all incidents.

The Group Health & Safety Manager will instigate a more detailed investigations when required. Safety representatives and employees are encouraged to get involved in the investigation process.

### *References*

- *CP039 Reporting, Recording and Investigation of Incidents*
- *Site Specific General Rules*
- *Generic and Specific Risk Assessments*

### **4.11.3 Statistics and Benchmarking**

The Health & Safety department will keep comprehensive statistics for reactive monitoring which will include the following:

- Incident data base to keep records and produce reports.
- Corrective action data base to control the implementation of corrective/preventive actions and will also include deficiencies highlighted by proactive monitoring
- RIDDOR and all injury incident rates
- RIDDOR and all injury frequency rates
- Severity and mean duration rates
- Details of incident costs and the costs of corrective/preventive actions

The Group Health & Safety Manager will benchmark all statistics internally (i.e. by site, individual, against goals) and externally against HSE industrial sector averages and other trade organisations/companies where possible.

### **4.11.4 Sickness Records**

1. Site management will report on details of sickness as part of reporting procedures details in HR procedures.

Sick absence is monitored by the HR department and reviewed by HR and site Managers monthly. Employees with higher levels of sick absence are investigated and referred to the Company occupational health advisor for support and further investigation as required.

### **4.11.5 Corrective Actions**

Where a corrective action identifies new or changed hazards or the need for new or changed controls, the procedure will require that the proposed action be taken through a risk assessment prior to implementation.

A review of the effectiveness of corrective actions will be undertaken. For high risk items, those with a priority category 1 this will be achieved using a NCR form where

the action is formally evaluated for effectiveness. Method of the evaluation of the actions rated as priority category 2 will be determined based on risk and factors such as how common the issue is. In cases where a formal NCR is felt justified, or where a previous issue has not been rectified, then the NCR will be raised. In most priority category 2 cases then the effectiveness will be reviewed at the next quarterly visit instead.

Corrective actions will be recorded on the central computer based log maintained by the H&S Department. Actions are allocated to specific managers and target dates set for completion. The priority category will be shown and whether a formal NCR was completed and summary of how evaluated. Low risks and recommendations (opportunities) are not recorded as corrective actions.

#### *References*

- *Site Specific General Rules*
- *Management of Health and Safety at Work Regulations & Approved Code of Practice*
- *Reporting of Injuries Diseases and Dangerous Occurrences Regulations (RIDDOR)*
- *OHSAS 18001/18002*

## **4.12 Review**

The management system will be reviewed as follows:

### **4.12.1 Board Meeting**

The Group Health & Safety Manager will summarise the company's health and safety performance and relevant issues in the form of a monthly report for discussion within the Board.

The CEO, Director responsible for health and safety, will ensure the health and safety report and other relevant health and safety issues are given adequate consideration by the board. Where required the Group Health & Safety Manager will be invited into the Board to answer questions, offer advice or give details relating to recommended proposals.

The CEO, Director responsible for health and safety, and the Group Health and Safety Manager will meet as necessary to discuss the health and safety performance of the company, determine what action needs to be taken and what issues need to be considered by the Board.

#### **4.12.2 Management Review**

The CEO, Director responsible for Health and Safety, will chair this meeting which will be undertaken approximately every twelve months. This meeting will be the main focus for the review of the management system and of the continual improvement process. Inputs shall include:-

- a. results of internal audits and evaluations of compliance with applicable legal requirements and with other requirements to which the organization subscribes;
- b. the results of participation and consultation
- c. relevant communication(s) from external interested parties, including complaints;
- d. the OH&S performance of the organization;
- e. the extent to which objectives have been met;
- f. status of incident investigations, corrective actions and preventive actions;
- g. follow-up actions from previous management reviews;
- h. changing circumstances, including developments in legal and other requirements related to OH&S; and recommendations for improvement.

The meeting will include the following personnel where possible: -

- The CEO, Director responsible for Health and Safety, (Chair)
- Group Health & Safety Manager
- CWG H&S Advisor
- Relevant executive directors and line managers as required

The Chairman of the committee will set the agenda via consultation with the Group Health & Safety Manager. The agenda will be geared to measuring performance against goals and continuous improvement.

#### **4.12.3. Local Safety Committees**

Local Safety Committees will meet at each site approximately every three months and will be chaired by relevant managers. The meetings will be controlled via site safety action plans and the agendas will be geared to measuring performance against goals, awareness and communication in an open forum. Relevant site personnel and employee safety representatives will attend the meetings as required.

Where possible the Group Safety Manager, or a member of the H&S Team, will attend all of these meetings in an advisory capacity.

#### 4.12.4 Operations/Sales Meetings

Health and Safety will be discussed in all operations meetings where required. Discussions will benchmark performance against goals and health and safety matters arising. Where possible the Group Health & Safety Manager will attend these meetings.

##### *References*

- *Site Specific General Rules*
- *Management of Health and Safety at Work Regulations & Approved Code of Practice*
- *Safety Representatives and Safety Committees Regulations as amended*
- *Health and Safety (Consultation with Employees) Regulations*
- *Health and Safety at Work Act*
- *OHSAS 18001/18002*

#### 4.13 Records

The company will establish and maintain adequate relevant health and safety records in line with the requirements of OHSAS 18001.

All OH&S documents and data will be controlled. They must all be authorised by a competent employee and approved by top management.

Unless specified differently within the management system all health and safety records at site level will be kept in a suitable system for at least two years. At the end of the two-year period all records will be sent to the company's Health and Safety Department where they will be stored for a further five years. The Health and Safety Manager will review all health and safety records in his possession every five years to determine what records will be archived and what will be destroyed.

All training records will be fully retained through periods of employment and up to a minimum of five years after employment. After five years the Group Health and Safety Department will review training records and determine what records will be archived and what will be destroyed.

All health surveillance and occupational health records will be retained for a minimum of forty years. All other archived records will be retained for a minimum of forty years.

All policies, procedures and risk assessments will be retained throughout their period of validity at both site and Head Office. Once superseded they will be destroyed as soon as possible except master copies which will be retained for at least five years. After five years masters will be reviewed by the Health and Safety Manager to determine what will be destroyed and what will be archived.

##### *References:*

- *CP001 Documentation Control*
- *OHSAS18001).*

#### **4.14 Communication with external interested parties**

- This policy is posted on the Company web site can be freely viewed
- Copies of this policy and other H&S documentation is sent on demand to suppliers and other interested third parties.
- Correspondence from external interested parties is date stamped prior to being forwarded to the appropriate manager for action
- Copies of responses are retained on a letter file.

#### **4.15 Purchase Controls for Safety Critical Equipment**

Approved suppliers and equipment specifications have been specified for safety critical equipment including:-

- Chemicals
- Personal Protective Equipment
- First Aid
- Fire
- Safety Training
- Lifting / Pressure equipment

This is documented in the approved suppliers for safety equipment log which is maintained by the H&S Department. The log is reviewed in light of experience or at least every 2 years.

## **5.0 Specific Risks**

The following areas of risk have been identified by the company as relevant to its workplaces and activities. The remainder of this section gives an overview of how the company intends to manage these risks as part of its day to day management process.

### **5.1 Machinery, Mobile and Static Plant**

All plant and machinery will be fit for purpose and designed and installed to minimise risk.

All plant and machinery purchased or leased will conform to the Supply of Machinery (Safety) Regulations as Amended and any other more specific regulations where required i.e. Pressure Systems Safety Regulations. Therefore all items will be adequately 'CE' marked and will have relevant certificates of conformity where required.

Any residual risk posed by this equipment (i.e. dangerous parts of machinery or material ejection), where required, will be reduced by guarding, other protection devices, safe systems of work, information, instruction and training.

The operation of all work equipment will, where required, be risk assessed and suitable safe systems of work will be developed and implemented.

All plant will be used in line with the manufacturer's recommendations and be safely installed and operated only by competent persons.

All mobile work equipment carrying persons including passengers will be suitably designed for that purpose and incorporate suitable seating. Where risk assessment identifies that there is a foreseeable risk to persons from mobile work equipment turning over the work equipment will be fitted with suitable roll over protective structures. Where there is a foreseeable risk of operatives being crushed, seatbelts or other restraining devices will be fitted and the company will ensure so far as is reasonable that they are worn.

All work equipment will be maintained by competent persons in line with manufacturer's recommendations. Regimes of inspections and simple maintenance will be implemented by CWG staff where required.

All maintenance work will be subject to risk assessment and where risks are significant, work equipment will be suitably isolated from sources of energy. Live working other than low risk maintenance or testing will not be permitted without individual risk assessments being approved by a director who will seek advice from the Health and Safety Manager and company Engineer.

*References:*

- *General site rules and risk assessments*
- *Transport risk assessment*
- *Relevant Company Working Instructions*
- *P(MA) Equipment Maintenance Policy*
- *Company Procedure – CP038 Lockout Tagout*
- *Company Procedure – CP005 Permit to Work*
- *Provision and Use of Work Equipment Regulations & Approved Code of Practice*

## **5.2 Vehicles**

In addition to the requirements in 5.1 all vehicles including LGVs will be: -

Strictly procured, operated and maintained in accordance with the company's 'O' licence and in a manner to limit risk.

Operated by competent personnel in a manner and in conjunction with suitable controls to comply with Road Transport Regulations and to minimise risk.

*References:*

- *Transport Generic Risk Assessments*
- *General Site Rules and Risk Assessments*
- *Collection Division Management and Drivers Risk Assessments*
- *Relevant Company Working Instructions*
- *Driver Handbook*
- *Department of Transport's Guide to Maintaining the Roadworthiness of Commercial Goods and Passenger Carrying Vehicles.*

## **5.3 Lifting Operations**

All equipment used for lifting operations will be fit for purpose, marked with their safe working loads and where required will suitably indicate any limitations of use. Lifting equipment will never be used to lift loads above their designated safe working loads except when being tested by competent persons.

Mobile plant (excluding dry waste vehicles) will not lift any objects using slinging equipment over one tonne in weight regardless of SWL (safe working load) without an individual risk assessment being undertaken by Site Management.

The company will ensure that no lifting equipment will be used to lift persons unless specifically designed and certified for that purpose.

All lifting equipment will be examined by a duly appointed competent person:

- At least every six months when items are lifting accessories or when used for lifting persons.
- At least every twelve months when items are other forms of lifting equipment.
- After conditions have occurred which could reduce the integrity of the equipment and jeopardise its safe operation.
- Where installation or re-installation could pose significant risk.
- Where risk assessment has indicated that more regular inspections are required to ensure safety.

When hiring lifting equipment the company will ensure that the equipment is supplied with details of last inspections and that the requirements above are met.

The company will ensure that all lifting operations are undertaken by competent persons (i.e. CITB qualified or equivalent for fork trucks, mobile elevated working platforms, and mobile plant) or in the case of dry waste vehicles either an external or internal assessment of competence.

- The company will assess the competence of any contractors employed to undertake lifting on its behalf.
- All lifting equipment will be inspected by operators prior to use and by management monthly. The company will therefore develop suitable defect reporting systems and methods of record keeping to meet this requirement.
- All lifting operations will be subject to risk assessment either generically or on a job specific basis (see sections 4.4). Risk assessments will focus on the requirements of this section, the positioning, installation of lifting equipment and the organisation of lifting operations to ensure safety.

*References:*

- *Company Procedure – CP002 Risk Assessment*
- *Company Procedure – CP005 Permits to Work*
- *Company Procedure – CP008 Assessment & Approval of Contractors*
- *Site General Rules and Risk Assessment*
- *Transport Risk Assessments*
- *Collection Division Management and Drivers Risk Assessments*
- *Drivers Handbook*
- *Relevant Company Working Instructions*
- *Lifting Operations and Lifting Equipment Regulations (LOLER) & Approved Code of Practice*
- *Provision and Use of Work Equipment Regulations & Approved Code of Practice*



## 5.4 Earth Works, Civil Engineering & Construction Work

All earthworks and civil engineering projects will be subject to risk assessment. In more simple routine cases risk assessments may form generic safe systems of work, where irregular, more complex activities will be subjected to a specific risk assessments for particular projects (see section 4.4).

All earth works and civil engineering projects will be designed to minimise risks both during and after construction and where applicable the company will fully implement the requirements of the Construction (Design & Management) Regulations 2015. Where the duties of the CDM principle designer, designer or principal contractor have been contracted out, the company will through contractor management systems ensure that these obligations are met.

### *References:*

- *Company Procedure - CP002 Risk Assessment*
- *Company Procedure – CP003 COSHH Assessment*
- *Company Procedure – CP005 Permits to Work*
- *Company Procedure – CP008 Assessment and Approval of Contractors*
- *Company Procedure - CP014 Project Management*
- *Site General Rules and Risk Assessments*
- *Relevant Company Working Instructions*
- *Construction (Design & Management) Regulations Approved Code of Practice*
- *Construction (Health, Safety and Welfare) Regulations*
- *Workplace Health, Safety and Welfare Regulations Approved Code of Practice*
- *HS(G)185 – Health and Safety in Excavations*
- *HS(G) 47 – Avoiding Danger from Underground Services*

## 5.5 Workplaces

Workplaces including vehicles will be designed, constructed and maintained in a manner to minimise risk, provide safe access/egress/movements and ensure suitable comfort levels for users.

All floors and traffic routes will be designed and maintained in a manner that is suitable for the pedestrians/vehicles who use them. As far as possible pedestrians will be segregated from vehicles and the risks of vehicle interface minimised by provision of suitable roads, one way systems and other traffic controls.

These controls will also be applied to all heating, temperature, space, ventilation, LEV, lighting, workstations, seating, windows and skylights, doors and gates, racking and shelving and welfare facilities (including sanitary provision, drink water and facilities for meals). Suitable provision will also be provided to ensure that persons within company workplaces are not unavoidably exposed to tobacco smoke and that facilities are provided for pregnant and nursing women to rest and where necessary lie down.

Where it is not reasonable for the company to provide facilities detailed above (i.e. in outdoor/remote or confined workplaces etc), it will via risk assessment identify suitable controls to reduce residual risks to acceptable levels. Examples include job cessation/rotation, PPE, signage, access equipment, transport to allow suitable access to public/company welfare facilities etc.

*References:*

- *Company Procedure – CP002 Risk Assessment*
- *General Site Rules & Risk Assessments*
- *Collection Division Management and Drivers Risk Assessments*
- *Relevant Company Working Instructions*
- *Workplace Health, Safety and Welfare Regulations Approved Code of Practice*
- *Construction ( Health, Safety and Welfare) Regulations*
- *HS(G) 136 – Workplace Transport Safety*
- *HS(G) 144 – The Safe use of Vehicles on Construction Sites*
- *L64 – The Health and Safety (Safety Signs and Signals) Regulations & Guide on Regulations*

## **5.6 Fire & Explosion**

All workplaces will be assessed against the risk of fire and explosion

The company will ensure adequate detection, warning and fire fighting equipment is supplied and adequately maintained.

The company will ensure adequate provision is maintained in relation to evacuation from its workplaces and persons are adequately instructed and trained to minimise risk.

*References:*

- *Site Fire Risk Assessments*
- *General Site Rules & Risk Assessments*
- *Collection Division Management & Drivers Risk Assessments*
- *Relevant Company Working Instructions*
- *The Regulatory Reform (Fire Safety) Order*
- *Dangerous Substances and Explosive Atmospheres Regulations.*

## 5.7 Contractors and Other Site Users

Contractors, customers and suppliers will be broken down into two distinct groups for management purposes.

### *Routine*

Involves persons undertaking low risk activities such as routine deliveries of waste, deliveries of supplies and low risk maintenance work. The company will ensure that all risks posed by these activities are adequately assessed and controlled by its own risk assessments and therefore routine consultation with employers on health and safety in these instances is not normally required. However, the company will co-operate and co-ordinate with these persons and their employers when required in the interests of health and safety. The company will also ensure that where required, site rules and any other health and safety information will be furnished to all employers at the start of operations and where required thereafter. The company will through contracts and general information ensure that employers responsible for these operations are made aware that these arrangements do not negate their responsibility for undertaking their own risk assessments.

### *Non-Routine*

Involving persons undertaking medium to high risk activities such as engineering works, maintenance of plant or tasks involving high risk elements i.e. confined spaces, working at height, lifting and slinging etc. The company will ensure that where required the general health and safety competence of these companies is suitably assessed via questionnaire or audit prior to commencement of operations and yearly thereafter. The company will also ensure that all of these activities are individually and adequately risk assessed via a process of co-operation and co-ordination with persons and employers concerned. Company requirements in terms of health and safety on its sites will be suitably highlighted to contractors via contractual and other correspondence. Suitable control measures to control identified risks generated by both the site and processes concerned will be agreed by both the company and other employers who will agree on the implementation and monitoring arrangements required.

Where required the company will fully implement the requirements of the Construction (Design and Management) Regulations 2015.

All contractors and site users will be made aware of risks and control measures by site rules, inductions, individual risk assessment instruction and health and safety signage as required.

*References:*

- *Company Procedure – CP002 Risk Assessment*
- *Company Procedure – CP003 COSHH Assessment*
- *Company Procedure - CP004 Visitor and Contractor Control*
- *Company Procedure – CP005 Permit to Work*
- *Company Procedure - CP008 Assessment and Approval of Contractors*
- *Company Procedure - CP014 Project Management*
- *Company Procedure – CP038 Lockout Tagout*
- *General Site Rules and Risk Assessments*
- *Site Rules*
- *Relevant Company Working Instructions*
- *Management of Health and Safety at Work Regulations & Approved Code of Practice*
- *Health and Safety at Work Act*
- *Construction (Design and Management) Regulations & Approved Code of Practice*

## **5.8 Visitors**

All visitors to company sites must be authorised by site management. They will be fully aware of site rules/further controls required and sign in at designated areas (i.e. weighbridges) prior to proceeding onto sites. Site management will ensure that access to specific danger areas is restricted and that suitable safety signage is erected to adequately inform visitors of appropriate risks and control measures.

Visitors will not be allowed to proceed into operational areas unless authorised and site inducted. Where visitors are not site inducted, they will be accompanied by CWG staff at all times.

The company will ensure that further controls are implemented to reduce any extra risks posed by young visitors (i.e. school parties) who after authorisation may visit its sites.

All lawful visitors will have free and easy access to all relevant risk assessments, safe working procedures and other relevant health and safety information.

### **Visits by Statutory Authorities**

Statutory authorities (i.e. HSE, Fire Authority and Environment Agency) will be given free access to all sites. However, the company will require that they inform site management of their intended movements, sign relevant visitor's books and observe site rules.

Statutory authorities will be authorised to proceed into operational areas unaccompanied when required to perform their statutory duties. In these instances they will be requested to inform site management who will take any necessary action to reduce risks where required (i.e. limit vehicle movements etc.)

## Unlawful Visitors

The company will ensure that sufficient provisions are in place to prevent unlawful visitors entering sites and entering specific danger areas where access has been achieved. Extra provisions will be employed where access by children is identified as problematic. The company will also erect reasonable signage to warn/inform unlawful visitors of potential site hazards.

### *References:*

- *General Site Rules and Risk Assessments*
- *Site Rules*
- *Relevant Company Working Instructions*
- *Health and Safety at Work Act*
- *Occupiers Liability Acts*
- *The Health and Safety (Safety Signs and Signals) Regulations & Guidance on Regulations.*
- *Company Procedure - CP004 Visitor and Contractor Control*

## **5.9 Welfare Facilities**

The company will provide all necessary welfare facilities to meet statutory obligations and any increased hygiene risks posed by its activities.

The company will provide on all of its facilities:

- Drinking water and facilities for hot drinks
- Adequate facilities for warming and eating food.
- Adequate sanitary conveniences and where these do not lock, separate facilities for males and females.
- Adequate facilities for washing hands.

In addition to the above the company will provide where required:

- Secure facilities for changing and storing clothing.
- Separate accommodation for work and home clothing.
- Laundry facilities for workwear.
- Adequate showering facilities with warm water and soap.

The company will ensure that all facilities are kept clean and hygienic.

It is the company's policy that employees dealing with waste or working in dirty environments are discouraged from proceeding home in contaminated work clothing.

### *References:*

- *General Site Rules & Risk Assessments*
- *Workplace Health, Safety and Welfare Regulations, Approved Code of Practice*
- *Construction (Health, Safety and Welfare) Regulations*

## 5.10 Confined Spaces

The company will identify and risk assess all confined spaces in its workplaces, plant and machinery that pose a foreseeable risk. Access to these areas will be restricted by fencing, manholes, guards, lockable doors/gates and signage.

Where reasonably practicable to do so the company will implement all measures necessary to allow operations to occur without entry into these identified confined spaces.

Access to confined spaces will only be permitted when there is no reasonably practicable alternative. Only personnel with confined space training may undertake this task. A suitable and specific individual risk assessment must be undertaken and approved by the Health and Safety Manager. Gas testing must be taken prior to entry and whilst in the confined space. Escape provisions must be in place prior to the task commencing. The task must be controlled under a confined space permit to work.

### *References:*

- *Company Procedure – CP002 Risk Assessment*
- *Company Procedure – CP003 COSHH Assessment*
- *Company Procedure – CP005 Permits to Work*
- *General Site Rules & Risk Assessments*
- *Collection Division Management & Drivers Risk Assessments*
- *Drivers Handbook*
- *Relevant Company Working Instructions*
- *Confined Space Regulations, Approved Code of Practice*

## 5.11 COSHH Hazards

See section 4.4.3

## 5.12 Noise

See section 4.4.4

## 5.13 Electricity

All electrical equipment supplied for use by the company will be fit for purpose (including strength and capability), adequately insulated/ positioned, guarded where required and be of the minimum voltage required to adequately perform operations. All portable electric hand tools will not exceed 110 volts unless unavoidable and authorised by management.

All electrical equipment and all items required for its safe operation will be adequately maintained to limit risk. Maintenance operations will also be conducted in such a manner as to limit risk. Where required all electrical equipment will have suitable means of isolation to allow maintenance work to be undertaken safely. Live working will not be permitted for any maintenance work (excluding low risk testing or very low voltage work) unless unavoidable and in all cases of higher risk live working, individual risk assessments will be approved by a director. All work on

electrical systems will be carried out by competent persons within the definition of the Electricity at Work Regulations.

All electrical systems and equipment will be suitably earthed, fused and where required fitted with appropriate protection devices for example RCD's (Residual Current Devices).

All portable electrical equipment will be tested at least annually and as frequently as three monthly in the case of hand tools or equipment operated out of doors.

All electrical circuitry in buildings will be integrity tested every 3 years. Where these responsibilities are that of a landlord the company will ensure legal obligations are met.

Management will undertake monthly visual inspections of all electrical equipment fixtures, fittings and wiring posing significant risk for signs of damage and fault.

No work will be undertaken on, or in dangerous proximity to, high voltage overhead or underground power lines without the approval of the electricity supply companies concerned. The recommended safe passing distances under all overhead power lines affecting company sites will be sourced from electricity supply companies. All access roads passing under overhead lines will have suitable protective structures positioned, in line with HSE guidance, to prevent vehicles/plant coming into to contact with or in close proximity to overhead lines. The company will also maintain records of all underground services, including high voltage lines, which affect its undertakings.

*References:*

- *General Site Rules & Risk Assessments*
- *Collection Division Management & Drivers Risk Assessments*
- *Relevant Working Instructions*
- *HSR25 – Electricity at Work Regulations 1989 Guidance on Regulations*
- *HS(G) 85 – Electricity at Work Safe Working Practices*
- *GS 6 – Avoidance of Danger From Overhead Electric Lines*
- *HS(G) 47 – Avoiding Danger from Underground Services*
- *IEE Wiring Regulations Requirements as amended for Electrical Installations 18<sup>th</sup> Edition.*

#### **5.14 Hot Work**

The company will ensure that no uncontrolled hot work is undertaken in any areas classified as a Flammable Zone, as defined by the DSEAR regulations or in other specified areas where there may be a temporary flammable atmosphere. Areas include covered sections of active cells on landfills, in the Distington Transfer Station, designated confined spaces and in other areas next to tanks, drums or containers which contain or are suspected of containing flammable substances or vapours. The company will also ensure that no uncontrolled hot work takes place in areas containing a significant risk from combustible materials i.e. Landfills, the Recycling Centres, storage areas, etc.

No hot work will be undertaken in the above areas without a risk assessment being undertaken and suitable controls being implemented. Risk assessments can be generic or specific depending upon the level of risk reference section 3:4.

No hot work will be undertaken in areas classified flammable Zones, in confined spaces or in other areas with a significant risk of a flammable atmospheres without gas testing being undertaken for LEL/oxygen enrichment and a hot work and zoned work permit being issued.

*References:*

- *Company Procedure – CP002 Risk Assessment.*
- *Company Procedure – CP003 COSHH*
- *Company Procedure – CP005 Permits to Work*
- *General Site Rules & Risk Assessments*
- *Relevant Company Working Instructions*
- *Dangerous Substances and Explosive Atmospheres Regulations*

## **5.15 Emergencies**

The company will ensure that risk assessments and adequate procedures are developed and implemented to minimise the risks to site users due to foreseeable emergency situations which result in conditions of serious and imminent danger i.e. fire, chemicals and other emergencies. The company will also as part of these procedures ensure that suitable links are established with the emergency services to deal with foreseeable emergencies. The company will also nominate a sufficient number of competent persons to implement the procedures and suitably train all others to give effect to these emergency procedures in so far as they relate to the evacuation of premises.

The company will also ensure that access to identified high risk areas is restricted to competent persons only and that all persons potentially exposed to serious and imminent danger are informed of the hazards and emergency procedures.

Procedures will also be developed to assist external organisations to deal with off site emergencies involving the transport of dangerous goods and other external company activities where required.



The company where required will monitor its activities to ensure that the full requirements of COMAH will be implemented if this becomes a requirement in any of its undertakings in the future.

#### *References*

- *Company Procedure CP002 Risk Assessment*
- *Company Procedure CP003 COSHH*
- *General Site Rules & Risk Assessments*
- *Collection Division Management & Drivers Risk Assessments*
- *Relevant Company Working Instructions*
- *Health and Safety at Work Act*
- *Management of Health and Safety at Work Regulations & Approved Code of Practice*
- *Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations*
- *Control of Major Accident Hazards Regulations (COMAH)*
- *Reporting of Injuries, Diseases and Dangerous Occurrences Regulation (RIDDOR)*
- *Control of Substances Hazardous to Health Regulations.*
- *Dangerous Substances and Explosive Atmospheres Regulations.*

### **5.16 Manual Handling**

The company will assess all manual handling operations which can pose significant risks to persons. These assessments will include the nature of tasks, the loads, the working environment and the individual capabilities of persons (including age, pregnant and disabled workers etc).

The company via these risk assessments will

- Avoid the need for manual handling where this is reasonably practicable to do so.
- Assess the risks of all manual handling operations that remain and reduce the risk of injuries to the lowest practicable levels by mechanical aids, limiting load sizes and other load hazards, providing suitable workplaces, adequate staffing, job rotation, information, instruction, training, and supervision.

Manual handling assessments will be undertaken generically for more routine tasks or form part of individual risk assessments.

All company employees who are required to lift and carry as part of their operations will be trained on the principles of manual handling and the correct methods of undertaking these operations.

#### *References:*

- *Company Procedure - CP002 Risk Assessment*
- *General Site Rules & Risk Assessments*
- *Collection Division Management & Drivers Risk Assessments*
- *Relevant Working Instructions*
- *Manual Handling Operation Regulations, Guidance on Regulations L23.*
- *Pristine Condition Training*

## 5.17 Working at Heights

The company through risk assessment will identify where working at height could result in personal injury from falls or from falling objects and will so far as is reasonably practicable, eliminate or reduce these risks by effective and suitable measures other than the provision of information, instruction, training and supervision.

Measures will include workplace design/automation, the provision of edge protection, covers, suitable access equipment, fall arrest/restraint equipment, and good housekeeping practice.

### *References:*

- *Company Procedure – CP002 Risk Assessment*
- *General Site Rules & Risk Assessments*
- *Collection Division Management & Drivers Risk Assessments*
- *Relevant Working Instructions*
- *Workplace Health, Safety and Welfare Regulation & Approved Code of Practice*
- *Work at Height Regulations*

## 5.18 Lone Working

Where significant risk exists, the requirements for lone working will be individually risk assessed either generally or individually to reduce the risks as far as possible by:

- Eliminating the need for the lone working activity
- The provision of extra employees
- The provision of communication devices and reporting procedures
- Information, instruction, training and supervision

Workers are not allowed onto company premises outside their contacted house without site management permission.

### *References:*

- *Company Procedure – CP002 Risk Assessment*
- *Company Procedure – CP031 Lone Working*
- *General Site Rules & Risk Assessments*
- *Transport Generic Risk Assessments*
- *Relevant Company Working Instructions*
- *Management of Health and Safety at Work Regulation & Approved Code of Practice.*

## 5.19 First Aid Provision

The company will assess the requirements for first aid provision within its workplaces to ensure that all facilities provided are adequate and appropriate to the numbers of persons present in the workplace and the particular risks involved.

The first aid equipment is inspected monthly against its guidance card and topped up as necessary. A log of these checks is maintained.

The company will ensure via risk assessment that there is a sufficient number of suitably trained staff on sites to take deal with first aid incidents.

All workers working away from company premises will be issued with adequate first aid equipment and mobile communications.

The company will inform all relevant persons of the first aid arrangements via induction, toolbox talks and signage.

### *References:*

- *Company Procedure - CP002 Risk Assessment*
- *Company Procedure – CP028 First Aid*
- *General Site Rules & Risk Assessments*
- *Collection Division Management & Drivers Risk Assessments*
- *Relevant Company Working Instructions*
- *The Health and Safety (First-Aid) Regulations & Approved Code of Practice.*

## 5.20 Working Hours

The company will assess its operations in relation to excessive working hours affecting health and safety within its workplaces. This assessment will determine whether further controls are required over and above the Working Time Regulations as amended. They will also determine where the Working Time Regulations do not, or only partially apply, i.e. through exempt occupations/operations, collective/workforce agreements, personal opt outs and unmeasured working time etc (exempt persons) that working hours do not significantly increase risk.

The company will ensure that all non-exempt employees will:

- Only work forty eight hours in any seven days averaged over a seventeen week reference period
- Receive eleven hours uninterrupted rest in every twenty four hour period

The company will also ensure that all persons exempt from the regulations will not work excessive hours likely to significantly increase risk and will ensure that these persons receive suitable compensatory rest periods.

The company will ensure that employees are entitled to as a minimum:

- Two twenty four hour uninterrupted rest periods in every fourteen days
- One twenty minute break in every six hour continuous working period. Provision will be made to enable these breaks to be taken away from workstations. Breaks must not be taken at the beginning or end of six hour working periods.
- Four weeks paid annual leave pro rata.

The above requirements will be increased by appropriate levels where risk assessment has identified that occupations require it due to physical, monotonous or stressful work, or by union, contractual or local agreement.

The company, where possible, will ensure that all night workers (i.e. more than seven hours per night including the period midnight until 5A.M) do not work more than eight hours in any twenty four averaged over a 17 week reference period. The company will also ensure that all persons exempt from the regulations will not work excessive hours likely to significantly increase risk and will ensure that these persons receive suitable compensatory rest periods.

All night workers will be given the option of free health assessments before the transition to night working and during night working cycles. The company will not require persons to undertake night work where, as a result of these health assessments, it can be demonstrated that the night working will be prejudicial to health.

The company will ensure that all relevant transport operations occur with strict compliance to tachograph legislation.

*References:*

- *Company Procedure – CP002 Risk Assessment*
- *Employee Handbook*
- *General Site Rules & Risk Assessments*
- *Collection Division Management & Drivers Risk Assessments*
- *Relevant Company Working Instructions*
- *The Working Time Regulations as amended.*
- *Driver Hours Regulations*

## **5.21 Wellbeing at Work**

As far as it is reasonably foreseeable the company will assess the risks of mental health issues within its workplaces in relation to:

- Time pressures
- Work overload/underload
- Interpersonal relationships and bullying
- Working hours (Ref. Section 5:20)
- Working environment
- Personalities

The company in relation to mental health will so far as is reasonable:

- Promote two way communication with its employees
- Promote a “no guilt” culture
- Discourage inconsistency, indifference and bullying from within its management process
- Encourage consistency of treatment of its employees by management
- Ensure the confidence and competence of staff
- Ensure employees have adequate skills, training and resources to undertake all required tasks

The company will monitor mental health within its operations so far as is possible by:

- Regular employee appraisals
- Site safety review meetings (open forum)
- Responding to staff concerns and complaints
- Not “turning a blind eye” to mental health in the workplace from whatever cause

Where illness or symptoms of occupational mental health have been identified the company will:

- Refer the employee to a company Mental Health First Aider.
- Refer employees to their GP, support agencies and its Occupational Health Advisors as appropriate for assessment and discuss the findings and recommendations with employees. The company and employees as a result of these discussions will tailor, agree and implement the recommendations from the assessments as required.
- Where employees expressly do not wish to be referred to the Occupational Health Advisors, the company and employees will undertake their own assessments and implement time off, adjust working hours and tailor occupations as deemed necessary.
- Offer professional counselling to employees where deemed required.
- Closely monitor and review all actions with applicable employees on a regular basis until symptoms subside.

*References:*

- *Company Procedure – CP002 Risk Assessment*
- *General Site Rules & Risk Assessments*
- *Collection Division Management & Drivers Risk Assessments*
- *Relevant Company Working Instructions*
- *Management of Health and Safety at Work Regulations & Approved Code of Practice*
- *The Working Time Regulations as amended*
- *HS(G) 218 – Tackling Work Related Stress*

## 5.22 Housekeeping

The company will undertake risk assessments of all workplaces to ensure that adequate arrangements are undertaken to eliminate or reduce so far as is reasonably practicable risks posed by inadequate housekeeping. This will include the provision of adequate storage facilities and adequate facilities for incoming wastes and wastes arising from its processes.

The company will undertake regular inspections of its workplaces to ensure that housekeeping arrangements are adequate and that levels of housekeeping are maintained to an adequate standard. The company will take appropriate actions where deficiencies are observed.

### *References*

- *Company Procedure CP002 – Risk Assessment*
- *General Site Rules & Risk Assessments*
- *Collection Division Management & Drivers Risk Assessments*
- *Site Fire Risk Assessments*
- *Relevant Company Working Instructions*
- *Workplace (Health, Safety and Welfare) Regulations & Approved Code of Practice*
- *Management of Health and Safety at Work Regulations & Approved Code of Practice.*

## 5.23 Neighbouring Organisations and Other Neighbours

The company will assess the risks of its operations in relation to its neighbours and the risks that neighbouring organisations pose to its operations. The company will implement control measures to reduce risks to acceptable levels where required.

The company will also co-operate and co-ordinate with its neighbours to reduce the risks of operational interface where required.

The company in line with its environmental policy will hold residents liaison meetings that will include discussions on health and safety related issues when required.

### *References*

- *Company Procedure – CP002 Risk Assessment*
- *General Site Rules & Risk Assessments*
- *Collection Division Management & Drivers Risk Assessments*
- *Relevant Company Working Instructions*
- *Management of Health and Safety at Work Regulations & Approved Code of Practice.*

## 5.24 Weather and Temperature

The company will assess any increased risk to its employees due to extremes of weather and temperature and where significant risk exists, will implement suitable controls to eliminate or reduce this risk so far as is reasonably practicable.

### *References*

- *Company Procedure – CP002 Risk Assessment*
- *General Site Rules & Risk Assessments*
- *Collection Division Management & Drivers Risk Assessments*
- *Relevant Company Working Instructions*
- *Workplace (Health, Safety and Welfare) Regulations & Approved Code of Practice*
- *Construction (Health, Safety and Welfare) Regulations*
- *Management of Health and Safety at Work Regulations & Approved Code of Practice*

## 4.25 Visual Display Equipment

The company will identify all persons within its workplaces whose health may be at risk from workstation use (i.e. VDU users) and carry out an assessment of the risks in a systematic way including non-obvious causes. This identification/assessment process will include employees, temps/agency personnel and self employed persons working for the company.

The company will take all reasonable measures to ensure significant risks are reduced so far as is reasonably practicable including:

- Providing work stations for use that limit ergonomic risks e.g. brightness, glare, flickers, temperature/humidity, bad posture/movements and other stress inducing factors.
- Ensuring that work is suitably interrupted by breaks or changes in work activity.
- Providing all VDU users access to free eye tests initially upon request and regularly thereafter when required by employees.
- Providing suitable corrective appliances as may be necessary when normal corrective appliances cannot be used, or where recommended as a result of eye tests. All corrective appliances will be issued/used only with the consent of employees.
- Providing adequate training and control measures in relation to workstations both initially and when workstations/work is modified.

The company will review these arrangements periodically and after significant changes are made to workstations and working patterns.

### *References*

- *Company Procedure- CP002 Risk Assessment*
- *General Site Rules & Risk Assessments*
- *Health and Safety (Display Screen Equipment) Regulations & Guidance on Regulations*

## 5.26 Young Workers

The company will not employ persons below the age of eighteen or children below school leaving age in any capacity without the approval of a director.

In all cases directors must satisfy themselves that any extra risks due to their lack of experience, immaturity or awareness of risk have been assessed and reduced so far as is reasonably practicable prior to authorising appointment.

The above will also be applicable to any persons supplied by contractors or employment agencies.

In no cases will the company employ a child below school leaving age (i.e. for the purposes of work experience) to undertake tasks that:

- are beyond physical and psychological capacity
- involve harmful exposure to agents
- involve exposure to harmful radiation
- potentially could cause injury due to lack of experience or attention to safety
- where there is a risk to health from extreme cold/heat, noise or vibration.

### *References*

- *Company Procedure – CP002 Risk Assessment*
- *General Site Rules & Risk Assessments*
- *Collection Division Management & Drivers Risk Assessments*
- *Relevant Company Working Instructions*
- *Management of Health & Safety at Work Regulations & Approved Code of Practice.*
- *INDG 364 Young People at Work and Work Experience*

## 5.27 New and Expectant Mothers

The company when notified in writing that an employee is a new or expectant mother will assess the risks to her, her child or unborn child due to her occupation. Where the risk assessment identifies that significant risk can not be avoided the company will:

- alter her working conditions to alleviate the risks or where this is not possible,
- identify and offer her suitable alternative employment and where this is not feasible,
- suspend her from work on full pay as defined by the Employment Rights Act.

### *References:*

- *Management of Health and Safety at Work Regulations & Approved Code of Practice*
- *HS(G)122 - New and Expectant Mothers at Work - A guide for employers*



## 5.28 Personal Protective Equipment (PPE)

The company will ensure so far as is reasonably practicable that PPE will only be specified for use as a last resort. Therefore the company will endeavour to reduce risks by other suitable means for example engineering, management solutions and safe systems of work. Where PPE is required for use the company will ensure that it is supplied free and that it is at hand or suitably accessible.

Where PPE is required for use the company will carry out a suitable assessment to ensure the PPE is:

- Adequate for the risks/work in hand.
- Adequately fits all wearers and is ergonomically suitable.
- Suitably compatible with other PPE/equipment being worn/used.
- So far as is reasonably practicable it will not increase other risks involved with the jobs or processes
- Suitably certified by an EU type examination and carries an appropriate CE mark.

The company will undertake all reasonable measures necessary to ensure that where PPE has been specified for use that it is worn and correctly used. Access is limited to approved PPE relevant to each sector via dedicated online ordering platforms. The company will ensure that all relevant employees are made aware of the PPE that they are required to use, its purpose, its limitations and ongoing maintenance requirements.

The company will so far as is reasonably practicable ensure that PPE is maintained in an efficient state, efficient working order and in good repair. Therefore as far as it is required, the company will ensure that all PPE is regularly inspected, tested/examined, repaired, cleaned, disinfected and replaced when necessary and in accordance with manufacturers recommendations. The company will also ensure that suitable accommodation is provided in which to store PPE and suitable records of its maintenance and inspection are kept.

The company will undertake all reasonable measures to ensure that employees:

- Use PPE in accordance with training and instructions
- Return it to the specified accommodation after use
- Report any defects or loss in relation to PPE.

The company considers it to be a serious disciplinary offence to jeopardise health and safety by wilful damage, horseplay and deliberately disregarding health and safety rules. This applies to personal protective equipment within its workplaces.

### *References*

- *General Site Rules & Risk Assessments*
- *Collection Division Management & Drivers Risk Assessments*
- *Site Rules*
- *Relevant Company Working Instructions*
- *Health and Safety at Work Act*
- *Personal Protective Equipment Regulations*

## 5.29 Alcohol and Drugs

The company will ensure that it undertakes all measures reasonably practicable to reduce the risks of alcohol and drugs affecting health and safety within its workplaces. To ensure that no persons are allowed to work on its sites under the influence of alcohol or any drugs at levels likely to endanger themselves or others, the company will endeavour to:

- Ensure that employees and others are aware of this policy requirement.
- Eject persons from plant, premises or hold them in safe locations when it is apparent that they are under an influence from alcohol or drugs which impairs their ability to perform their required functions.
- Inform the police and/or other employers where persons fail to comply, are violent or insist on driving non-company owned vehicles (i.e. off site).
- Carryout, where possible/required alcohol/drug monitoring of its employees where abuse is suspected.
- Offer reasonable help, assistance and advice where personal problems or addiction have been identified as causes by employees.
- Encourage employees and others who are on prescribed drugs to inform the company and therefore allow suitable risk assessments to be undertaken.
- Offer suitable awareness training as may be necessary.
- Undertake annual medicals of employees where identified by risk assessment. This will be geared to identifying abuse and offering guidance.
- Take all disciplinary action as may be necessary to ensure compliance with this policy.

### *References*

- *General Site Rules & Risk Assessments*
- *Company Policy P(D&A) – Drugs and Alcohol*
- *TBT 21 – Drugs and Alcohol*

## 5.30 Asbestos

The company will assess the risks of asbestos within its workplaces and where possible will eliminate this risk. Where this is not possible i.e.:

- During removal.
- When providing a service for the disposal of asbestos.
- Where asbestos material forms integral parts of buildings or machinery for which its removal is not considered reasonable, and during the maintenance of such buildings and machinery.

The company will ensure that measures are taken to reduce exposure to the lowest levels reasonably practicable. In all cases levels of exposure will be below prescribed control limits or action levels detailed in the Control of Asbestos at Work Regulations. Asbestos surveys will be undertaken on all workplaces to an extent proportionate to the risks.

Where work is undertaken in areas under the company's control involving a significant risk of asbestos exposure the company will assess the risks and:

- Identify the type of asbestos involved unless it has reasonable grounds for assuming the asbestos is not chrysotile alone and intends to treat it accordingly for the purposes of safe working.
- Produce a plan of work including safe working procedures which will be adequate to meet the requirements of 4:30:1. Where the work is straight forward and the risk of exposure is low these procedures may be generic (i.e. the disposal of asbestos in landfills).

The company will ensure:

- It does not undertake any work for which a licence is required under the Asbestos (Licensing) Regulations.
- It notifies the HSE of all other work involving asbestos on the first occasion where employees are likely to be exposed to levels of asbestos above prescribed action levels.

The company will make suitable arrangements to ensure that all employees and others who may be exposed to asbestos within its workplaces at levels requiring controls, are suitably instructed, trained and have access to all relevant information on all applicable risks and control measures.

Where after applying all other reasonable controls, significant risks of exposure to asbestos fibres remain, the company will provide suitable respiratory protective equipment to adequately control these risks. Where this is a requirement the company will ensure that all equipment is adequately maintained and relevant employees are suitably trained in its use.

The company will ensure that when transporting or storing waste asbestos that containers are designed, constructed and maintained to prevent asbestos escaping during normal handling. In addition to this all raw fibres, loose dust/fibrous wastes or wastes in small fragments will also be double bagged in appropriate sacks.

The company will ensure that all asbestos wastes stored or transported will be:

- When in the form of raw fibres, labelled in accordance with the Asbestos at Work Regulations **in addition** to CHIP as amended and relevant regulations pertaining to the carriage of dangerous goods where these regulations apply.
- When in the form of all other asbestos, including equipment and PPE, will be labelled in accordance the Asbestos at Work Regulations **unless** applicable carriage of dangerous goods regulations apply.
- Carried in full compliance to the Environmental Protection Act and Hazardous Waste Regulations where these regulations apply.

The company will not routinely monitor the working environment or undertake health surveillance specifically for asbestos unless specific risk assessments indicate that this is required. This is due to the fact that under normal operations:

- Exposures have been assessed as low and unlikely to approach action levels.
- All asbestos related work is intermittent and of short duration and enough information is available to enable appropriate protective equipment to be supplied.

The company will ensure that when working with asbestos insulation, coatings and insulation boards that in addition to this policy, the full requirements of the HSE Approved Code of Practice L28 is implemented unless:

- The material is in the form of asbestos cement, bitumen, resins or rubber which contains asbestos.
- The material is derived from contaminated land.
- The work is of a short duration as defined by the Asbestos (Licensing) Regulations.

The company when appointing contractors to undertake asbestos related work will ensure that:

- Where required they are licensed under the Asbestos (Licensing) Regulations.
- Contractor management systems are implemented to ensure compliance to the Asbestos at Work Regulations and this policy
- Where required the HSE Approved Code of Practice “Work with asbestos insulation, asbestos coating and asbestos insulating board” is implemented.

#### *References*

- *Company Procedure – CP002 Risk Assessment*
- *Company Procedure – CP040 Asbestos*
- *Company Procedure – CP041 Management of Building Containing Asbestos*
- *General Site Rules and Risk Assessments*
- *Collection Division Management & Drivers Risk Assessments*
- *Relevant Company Working Instructions*
- *Control of Asbestos at Work Regulations*
- *L28- Work with Asbestos Insulation, Asbestos Coating and Asbestos Insulating Board & Approved Code of Practice*
- *The Asbestos (Licensing) Regulations & Guidance on Regulations*
- *CLP*
- *Carriage of Dangerous Goods and use of Transportable Pressure Equipment regulations.*
- *Environmental Protection Act*
- *Hazardous Waste Regulations*

### **5.31 Mobile Phones**

The company will not permit the use of any hand held mobile phones or attachments while driving any company vehicles. This requirement also extends to vehicles which may be hired or leased by the company regardless of period or circumstances. In addition to this the company will not permit the use of hand held mobile phones or attachments by persons driving privately owned vehicles while such persons are representing the company and are acting in the course of their employment. The company will not permit the use of hand held mobile phones or attachments under any circumstances by persons operating mobile plant and machinery.

The company will not permit the use of any hand held mobile phones or attachments by any persons not in its employment while such persons are driving or operating vehicles plant or machinery in any workplace under the full or the partial control of the company.

The operation of mobile phones and attachments will only be permitted while driving vehicles under the above circumstances when this is undertaken using a suitable hands free system and any associated risks are minimal. Mobile phones may only be used by persons who operate mobile plant and machinery when such plant and machinery is shutdown in a safe location.

Where required, the company will implement suitable disciplinary procedures to address any violations of this policy.

#### *References*

- *The Road Vehicles (Construction and Use) (Amendment) Regulations.*

### **5.32 Seatbelts**

It is the policy of the company that seatbelts are worn in all mobile plant and vehicles when being driven or operated in company workplaces, the public highway or in external workplaces. This applies to:

- Company operated mobile plant and vehicles including all waste collection vehicles.
- Contractor operated mobile plant and vehicles when engaged by the company.
- All company cars and vans issued to individual employees.
- All private vehicles when being used by employees in the course of their employment.
- All customer vehicles delivering waste to our sites where seatbelts are fitted.
- All vehicles visiting company workplaces for purposes other than delivering waste.

The wearing of seatbelts will only be relaxed under the following circumstances:

- After risk assessment where the wearing of seatbelts would increase the overall risk (for example quad bikes).
- When LGV waste collection vehicles are placing and loading containers.
- When waste collection vehicles are operating on individual collection rounds i.e. kerbside vehicles. However it is mandatory that seatbelts are worn when travelling more than any distance over 60 metres, between collection rounds or between collection rounds and disposal sites or for any other purpose.
- When LGV waste collection vehicles are required to undertake difficult manoeuvres (i.e. in confined areas) where the wearing of seatbelts would increase the overall level of risk. However the wearing of seatbelts in LGV collection vehicles is mandatory at all other times.

The company will actively enforce this policy via its proactive and reactive monitoring arrangements and will consider all violations as potential disciplinary offences.

### **5.33 Malicious Acts, Violence or Abuse**

Public facing employees will receive instruction on the avoidance of violence and aggression.

The company will not tolerate abusive or violent behavior towards its workforce and will report offenders to the authorities if the matter cannot be resolved locally.

Employees who receive external post will also receive instruction on how to deal with suspect letters or packages.

All instances of violence, abuse or suspected malicious acts are to be reported to management immediately. Local management must investigate any instances and report their findings via the incident reporting system.

Revision: 13.0

Biannual review . editing references and swapping Safety Action Plan ref to General site rules.