



Cleansing Service Group Ltd

HEALTH & SAFETY POLICY DOCUMENT

**Issue: January 2020
Review: 1 year**



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SECTION 1

Corporate Health & Safety Policy Statement



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Commitment

CSG is committed to the effective management of Health and Safety across the Group. We aim to reduce hazards and associated risks so far as reasonably practicable to prevent accidents, injuries, ill health, unsafe acts and unsafe conditions.

This requires our commitment to: Continuously improving Health and Safety performance through the prevention of accidents and incidents; to providing a safe and healthy work environment which protects employees, contractors, customers and visitors; whilst ensuring as far as reasonably practicable compliance with current regulations and legislation regarding health and safety.

We will accomplish this commitment by:

- Promoting and driving an innovative and positive Health and Safety culture throughout the organisation
- Engaging the whole work force in Health and Safety matters
- Visible and active commitment from management to lead by example.
- Placing high priority on Health and Safety considerations in managing our business and integrating Health and Safety thinking into all business processes
- Provide relevant Health and Safety training and supervision, safe plant and equipment
- Encouraging and supporting the reporting of near misses and safety observations
- Positive intervention when observing unsafe acts or conditions
- Recognising and learning from all accidents, incidents, near misses & observations and acting decisively to eliminate future risk as far as reasonably practicable.
- Set, monitor and review health & safety objectives and actions to ensure improvements are implemented.
- Identifying and mitigating health and safety risks through co-operation with stakeholders
- Providing the required resources and support to achieve the above

Responsibilities

Every employee within the Group has responsibilities for Health and Safety as outlined in document CM 4.01 T2 "Health and Safety Responsibilities".

In addition to this, CSG will encourage and support all staff to take personal responsibility for their own Health and Safety and that of those around them.

Arrangements

We aim to deliver on the above commitments through our Health and Safety Pillars:

Safe Environment Safe Systems Safe People Safe Equipment

The Board of Directors will agree objectives against each of these pillars on an annual basis which will be delivered through line managers, supported by health & safety managers, with a process for monitoring progress against them.

This policy will be supplied to stakeholders and interested parties upon request.

This Policy has been authorised by:

Neil Richards,
Managing Director, Cleansing Service Group Ltd.

SECTION: POLICIES

OWNER: HEALTH & SAFETY COMMITTEE

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SECTION 2

Organisation for Health & Safety



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The Group's approach:

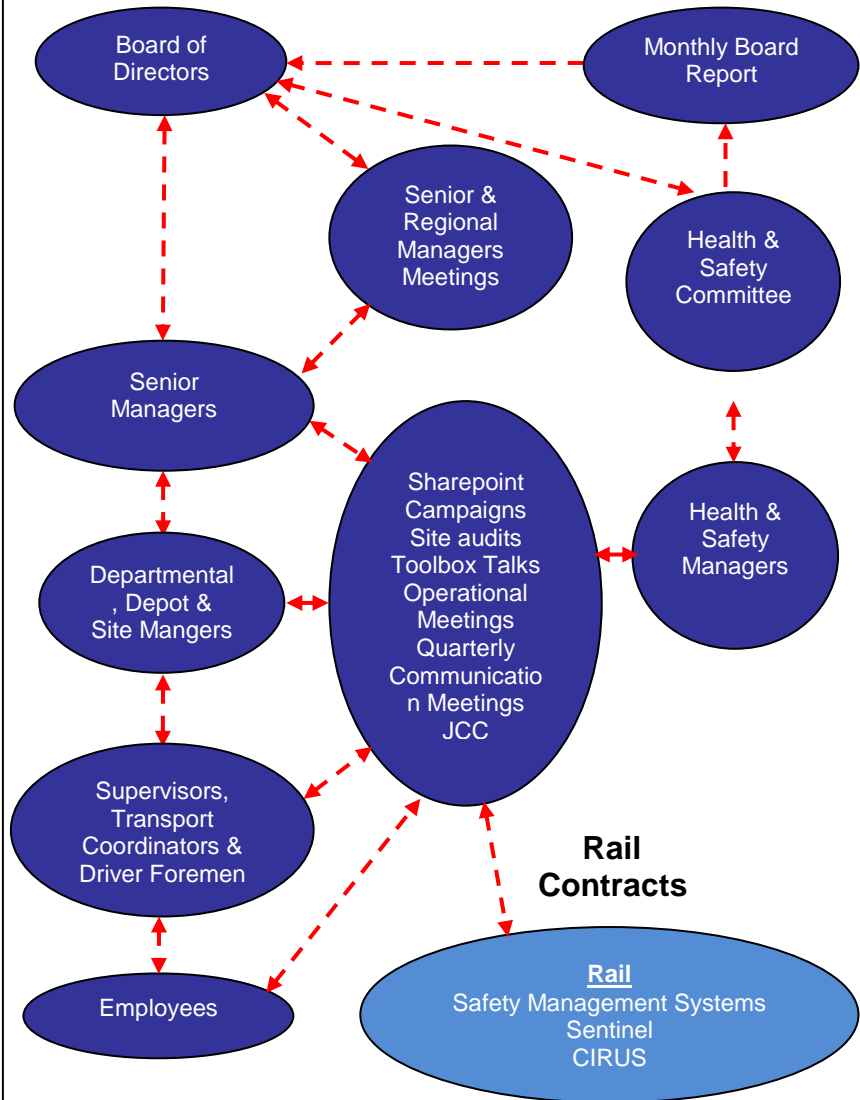
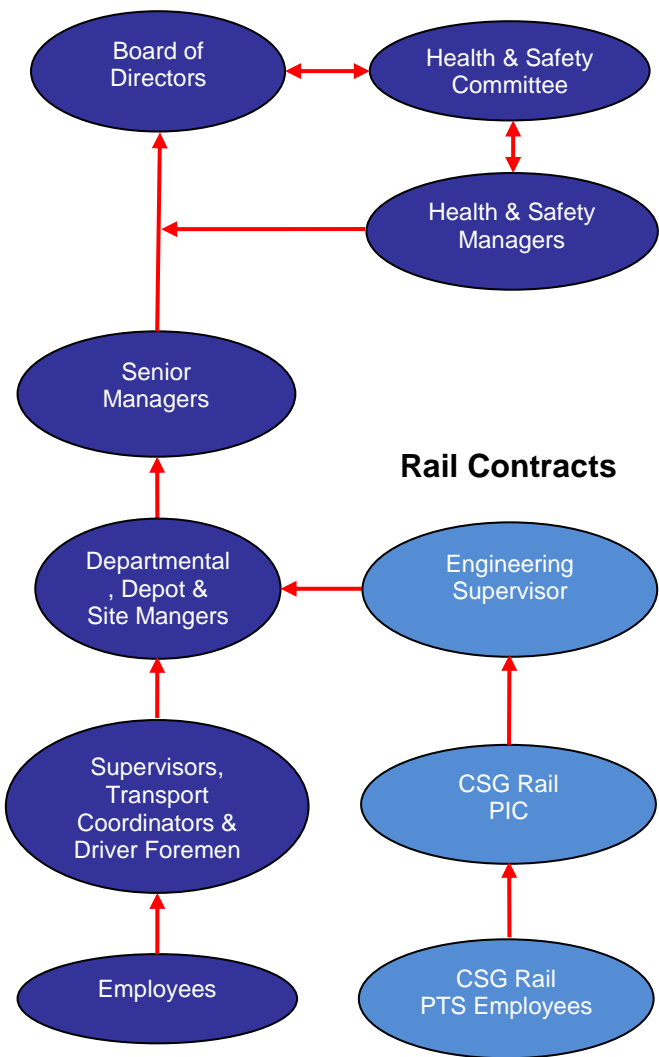
- Health and safety are line management responsibilities which are delivered through the Group's line management structure as shown below (left),
- Employee consultation is facilitated through a variety of methods including Departmental Communications Meetings and Joint Consultative Committee (JCC) Meetings as shown below (right),
- Competent health & safety advice, support and leadership is available through the provision of internal Health and Safety Practitioners.

Reporting Line ↔

Communication Line - - - ↔

Roles and Responsibilities

Communication



The Group consists of Cleansing Service Group Ltd. and its Subsidiary Companies

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SECTION 3

Health & Safety Responsibilities



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HEALTH & SAFETY RESPONSIBILITIES CM 4.01 T2

POSITION	RESPONSIBILITY
BOARD OF DIRECTORS	<ul style="list-style-type: none"> • Ensures that the overall arrangements for the Groups operations are executed at all times in such a manner so as to ensure, as far as is reasonably practicable, the health, safety and welfare of all employees and others who may be affected by its operations • Ensures that the company fulfils its legal obligations under the Health and Safety at Work etc Act 1974 and any other relevant Acts of Parliament and Statutory Instruments • Ensures there is an effective company policy for health and safety and that all employees, contractors and temporary workers are made aware of their individual responsibility • Reviews the company's health and safety performance and arranges for the effective planning, organisation, control, monitoring & review of preventative and protective measures for health & safety • Establishes effective downward communication systems and management structures • Facilitates the assessment of risks to employees, customers and any other parties who could be impacted by the company's activities • Participates in health & safety inspections at all operating depots • Ensures that notification and reporting requirements to the relevant statutory authorities are fulfilled • Ensures that responsibilities for health and safety are integrated into the management structure and that managers are adequately trained and capable • Allocates resources for health, safety and welfare as is necessary, including the appointment of competent persons for the management of health & safety within the business • Ensures that health and safety is considered with the same importance as other business functions, particularly when assessing the implications of change • Provides leadership of a positive health & safety culture
HEALTH & SAFETY MANAGERS	<ul style="list-style-type: none"> • Understands the application of and advising on the implementation of the Health and Safety at Work etc. Act 1974 and other legislation relevant to the Company's business • Keeps up to date with changes in current legislation and brings it to the attention of the Board where relevant • Assists with the implementation of the company's health & safety policy • Carries out monitoring, reporting and reviewing of the company's safety performance • Communicates health & safety policy and procedures to managers • Reports health & safety performance to the Board • Assists managers in the identification and management of health & safety risks and application of control measures to ensure safe systems of work are in place • Assists with investigation of significant incidents with line management / employee representatives if directed • Conducts audits of the effectiveness of the management processes and risk controls for health, safety and welfare • Highlights mandatory and other training requirements in health & safety across the company and ensuring that appropriate safety-related training is provided at all levels of the organisation • Participates in operational health and safety meetings as necessary • Be a fully participating member of the Health & Safety Committee fulfilling its roles & responsibilities • Promotes a positive health & safety culture



POSITION	RESPONSIBILITY
<p style="text-align: center;">SENIOR MANAGERS</p>	<ul style="list-style-type: none"> • Understands and implements the requirements of the Health and Safety at Work etc. Act 1974 • Assists with effective implementation of the company's health & safety policy and supports the Board in policy-setting • Assesses the health and safety implications of introducing new working practices or new personnel and monitors ongoing performance • Reviews the performance of their direct reports including health and safety • Ensures the Board are informed of progress and developments in all relevant health & safety matters • Communicates responsibilities to personnel under their authority and ensures that each employee understands that responsibility and is able to carry it out • Ensures that significant incidents are reported as soon as possible to the Board and to the appropriate H&S Manager and that investigations take place to identify root & underlying causes • Ensures that suitable & sufficient risk assessments and procedures are in place to ensure safe systems of work for all activities under their control • Carries out audits of their areas of responsibilities & organising audits to be carried out to assist in the management of health & safety • Ensures that adequate resources, including competent and trained personnel, are made available for health, safety and welfare within their areas of responsibilities • Provides leadership of health & safety activities to promote a positive health & safety culture
<p style="text-align: center;">DEPARTMENTAL DEPOT & SITE MANAGERS</p>	<ul style="list-style-type: none"> • Understands & applies the main requirements of the Health and Safety at Work etc. Act 1974 • Understands & applies Group health & safety policies and procedures • Makes recommendations for improving health & safety performance • Ensures that health & safety policies and procedures are communicated to all employees within their areas of responsibility • Ensures that health and safety issues are discussed in departmental communications meetings • Ensures that suitable & sufficient risk assessments and procedures are in place and being applied to ensure safe systems of work for all activities under their control, including contractors • Ensures that all incidents are reported, recorded and investigated • Carries out audits of their areas of responsibilities and undertaking workplace inspections • Ensures that employees within their areas of responsibility are properly trained and instructed as to their duties and responsibilities • Engages the workforce in the promotion and achievement of a positive health & safety culture



POSITION	RESPONSIBILITY
<p>SUPERVISORS, TRANSPORT COORDINATORS & DRIVER FOREMEN</p>	<ul style="list-style-type: none"> • Acts in accordance with the requirements of the Health & Safety at Work etc. Act 1974 • Understands & follows the Group health & safety policy and procedures • Implements changes to health & safety systems following reviews • Informs employees of their health & safety responsibilities and responds to employees concerns about health & safety • Ensures that risk assessments & work procedures are adhered to resulting in safe systems of work • Ensures that incidents and near-misses are reported and assists in any subsequent investigation as directed • Carries out regular inspections of the workplace and reports findings to management • Ensures that employees are sufficiently instructed, informed & supervised and allocates work in accordance with the employee's level of competence & experience • Sets a good example as part of a positive health & safety culture
<p>EMPLOYEES</p>	<ul style="list-style-type: none"> • Takes care of their own health & safety and that of people who may be affected by what they do in accordance with the requirements of the Health & Safety at Work etc. Act 1974 • Works in accordance with the Groups health & safety policy and procedures • Co-operates with others on health & safety, including not interfering with, or misusing, anything provided for health, safety or welfare • Attends departmental communications meetings and raises health & safety concerns • Carries out assigned tasks and duties in a safe manner and in accordance with measures set out in risk assessments & method statements to ensure a safe system of work at all times • Reports incidents, near-misses and defective equipment • Obtains and uses the correct tools, equipment & personal protective equipment specified for each task, only operating tools & equipment which they are authorised to use in accordance with training & instruction received • Contributes to health & safety reviews and inspections • Participates in a positive health & safety culture

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OWNER: HEALTH AND SAFETY MANAGER

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SECTION 4

Health & Safety Management



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4. Health and Safety Management

4.1. Objectives (CM/4.01)

GENERAL

The Corporate Health and Safety Policy Statement CM/1.03 (see section 1 above) clearly states the Group's vision for health and safety.

The Group is committed to continually improving health, safety and welfare standards and performance. To this end it endeavours to ensure that all relevant Statutes, Regulations and Codes of Practice are complied with. The minimum standards that are adopted by the Group are those required by law, although the Group will seek always to exceed these where there is a demonstrable benefit.

Health & safety objectives together with appropriate arrangements and management systems are detailed below:

OBJECTIVES

In working towards our vision for health & safety, the following will form the Groups' aims and objectives:

- Provision of healthy and safe working environments and working practices for all employees;
- Ensure that Plant (vehicles, machinery and equipment) is maintained in a safe condition;
- Identify hazards and assess, reduce and control risks arising from Group activities;
- Implementation of safe practices and procedures in connection with the handling and use of hazardous substances;
- Provision of appropriate information, training and resources to enable employees to carry out their duties competently and in a manner which prevents harm to themselves, others and the environment;
- Encourage employee involvement and personal commitment to achieving the Group health & safety objectives;
- Establish communication networks to disseminate and exchange information on health & safety policy, performance, current best practice and responsibilities;
- Investigate all accidents, incidents and near misses at work and cases of work-related ill health and implement appropriate remedial action with the aim of preventing a recurrence;
- Record and analyse safety and health statistics and use these to improve;
- Monitor the performance and effectiveness of the safety management systems through regular programmes of relevant audits, and review as necessary at regular intervals;
- Ensure adequate arrangements and procedures are in place to cover emergencies;
- Achieve progressive improvement of health, safety and welfare standards in all aspects of the business;
- Ensure work activities are conducted in accordance with all legal obligations;
- Ensure contractors working for the Group meet the Group's minimum requirements.

The Board will ensure that adequate resources are committed in pursuance of these aims and objectives.



ORGANISATION FOR HEALTH & SAFETY

An organogram (CM/4.01/D1) illustrates the Group's approach to health and safety showing the interaction within the Group's organisational structure (see section 2 above).

RESPONSIBILITIES

Overall responsibility lies with the Managing Director. Day to day implementation is delegated through every level from the Managing Director to Depot/Site/Departmental Managers and individual employees.

Each business unit within the Group is responsible for establishing and maintaining its own specific procedures consistent with the Groups' Safety Management System. Depot/Site/Departmental Managers are responsible for ensuring that safe systems of work are in place to control the risks to which their team members may be exposed. Every line manager is responsible for achieving the standards in their area of control.

All employees have legal obligations to take all reasonable care to protect themselves and anyone else affected by their acts or omissions. As such all employees are expected to recognise this duty they have and accept responsibility to do everything they are able to prevent injury to themselves and others and loss to the Group.

An overview of health and safety responsibilities is detailed in Group Procedure CM/4.01/T2 (see section 3 above).

Employees must co-operate with the Group by:

- Working safely and efficiently to approved methods
- Working with regard to the safety of themselves and others
- Adhering to the Group's safety procedures and rules
- Reporting all accidents in the correct manner and co-operating in the investigation of accidents and measures taken to prevent recurrence
- Reporting possible hazards, defects or dangers

ARRANGEMENTS, POLICIES AND PROCEDURES

The policies and procedures for health and safety are to be found within the Company Manual available on the Group intranet (Sharepoint).

These cover arrangements for general work-related risks including Risk Management and Risk Assessments, Manual Handling Assessments, COSHH Assessments, Fire Safety, Office Safety and DSE Assessments, Electrical Safety, Plant and Equipment Maintenance, PPE, Accident Reporting and Investigation (including Vehicle-related Incidents and Near Miss Reporting), Safety Inspections, Noise Control and Emergencies (including First Aid, Spillage Control) together with more specialised risks associated with the Group's core business including Confined Space Working, Permits to Work, Tanker Dig-out, Working with Sewage, Daily Vehicle Safety Checks, Lone Working, Working at Height, Control of Contractors, and vulnerable workers such as Young Persons and Expectant Mothers.

A summary of these arrangements is detailed in section 4.2 below.

Specific safe systems of work including risk assessments, work instructions and method statements are developed and filed locally at each Group location and form part of the Site Manual for that location.



In addition the Group has separate Policies in place (outside of the health and safety section) for specific areas which include health and safety related issues: Training (CM/1.06); Induction Training (CM/2.07); Employee Training & Development (CM/2.08); Site Security (CM/1.07); Statutory Inspections (CM/1.12); Mobile Phones (CM/1.20); Preventative Action (CM/2.09); Driving Licence Control (CM/3.22); Working Time Directive (CM/3.24).

4.2. Arrangements for carrying out the Policy

4.2.1. Legal Requirements

The Group maintains a Register of Legal Requirements that identifies the various health & safety regulations, codes of practice, industry guidance etc. that affect the Group's business activities (refer to CM/4.01/R1). This register is cross-referenced to the Group's policies and procedures to further ensure full compliance (refer to CM/4.01/T1).

4.2.2. Safety Management System

The Group's Safety Management System is documented and structured, following HSE guidelines, and forms part of the Group Integrated Management System. The system follows a three-tier approach with top level policies and procedures supported by safe systems of work, risk assessments, work instructions, method statements etc. Policies and procedures are posted on the Group's intranet – Sharepoint – and safe systems of work are held locally at Group locations. A system of document control, review and revision is used to ensure that all documentation is kept up-to-date.

4.2.3. Risk Assessments

Risk assessments are carried out for all activities in accordance with the Management of Health and Safety at Work Regulations 1999. These assessments are carried out by trained and competent persons including Departmental Managers and the Group Health and Safety Manager. Risk assessments may be generic or site specific depending upon the particular activity or customer requirement. All risk assessments are documented and copies given to employees as appropriate. Copies are also stored on the Group's intranet (Sharepoint). In addition risk assessments are carried out continuously by employees throughout their work.

Hazards are identified and the risks evaluated in severity before, and again after, the application of control measures. If the risk is still high, the job will not take place until additional control measures have reduced the risk to an acceptable level. Work methods are established to minimize the risk of injury to employees and others affected by the work. For high risk activities, e.g. confined space working, additional assessments are applied such as permits to work prior to commencement of any work.

The nature of waste collection, handling and the location of work is extremely variable and is often carried out on premises not controlled by the Group. As such the Group requires its employees to carry out dynamic or "last minute" risk assessments prior to commencing work and to report to their Depot manager any significant hazards not identified in, or different to, the task risk assessment.

Risk assessments are reviewed and updated periodically or when changes occur in the work activity or working environment. (Refer to Procedure CM/4.05 Hazard & Risk Management).

4.2.4. Public safety

The health and safety of members of the public (and other third parties e.g. contractors, visitors), that may be affected by the Group work activities, is considered



paramount at all times. The risk assessments will include any affect on third parties and control measures will be implemented to eliminate or reduce the risk to an acceptable level. Any work area that could place others at risk due to the Group's activities will be closed off by appropriate means (e.g. safety signage, barriers, cones, tape, hoarding) in order to restrict access.

Visitors to Group sites/premises are made aware of safety rules and procedures that affect their safety and are restricted from entering hazardous areas.

4.2.5. Training

All employees are given training appropriate to their responsibilities in accordance with the Management of Health and Safety at Work Regulations 1999. Training will be provided for the following situations:

- Induction training for new employees (Health and safety awareness, Group Policies & Procedures, Safe Systems of Work etc.)
- The introduction or modification of new/existing machinery or technology
- A change in employee position/work activity or responsibility

Training is also specifically provided for work with hazardous substances, use of PPE and manual handling. Any training provided by the Group will be formally recorded with a hard copy kept on file.

A programme of refresher training will be undertaken to keep employees up to date with legislation and industry best practice. (Refer to Policy CM/1.06 Corporate Training Policy and Procedures CM/2.07 Induction Training & CM/2.08 Employee Training & Development).

4.2.6. Communication and Consultation

In order to meet the legal requirements of the Health and Safety (Consultation with Employees) Regulations, the Group will communicate and consult with all employees on the following issues:

- The content of this policy
- Any rules specific to a site or job
- Changes in legislation or working best practice
- The planning of Health and Safety training
- The introduction or alteration of new work equipment or technology

This communication and consultation will take place directly with the employees via a number of different methods including regular departmental communications meeting, tool-box talks, memos posted on the site notice boards, via the employee representatives (Joint Consultative Committee) etc. (Refer to Procedure CM/4.46 Safety Communication, Consultation & Participation).

4.2.7. Workplace Safety

All Group premises and work sites are required to meet certain standards. Workplace inspections are carried out by Group management to monitor health and safety conditions and performance. In addition every Group location is audited by the Group Health & Safety Manager and an action plan determined to rectify any deficiencies. Audits are also carried out on Group employees working at customer's premises/sites.

There are systems in place to report workplace hazards, safety concerns and defective plant/equipment.



4.2.8. Occupational Health

The Group is committed to improving the health and well-being of all employees. The Group recognises that occupational ill-health is preventable by taking effective steps to control health risks at work (refer to Policy CM/1.30 Occupational Health Policy).

4.2.9. Preventative Inoculations

The Group requires and actively encourages all operational employees, on commencement of employment, to consult with their own GP on the recommended preferred prophylactic injections for waste industry workers.

4.2.10. Alcohol and Drugs Policies

The Group does not tolerate any employee (or contractor engaged by the Group) being at work under the influence of alcohol, drug (illegal or medicinal) or other substance which renders them unfit for work. Furthermore the Group does not tolerate possession, consumption, handling or selling of alcohol or drugs on Group or customer premises (refer to Policy CM/1.10 Alcohol Policy and CM/1.22 Drugs Policy).

Any such conduct committed by Group employees is deemed unacceptable and will be treated as gross misconduct according to Group disciplinary procedures.

The Group does however consider alcohol or drug misuse as a health issue rather than a case for instant dismissal and encourages any employees with an alcohol or drug-related problem to seek help voluntarily.

4.2.11. Personal Hygiene

The Group requires all employees to maintain a good standard of personal hygiene at all times. The Group provides work wear and laundry facilities to ensure employees have clean clothing. Furthermore the majority of the Group's vehicles are fitted with hand-washing facilities and employees are provided with wipes, soap etc to facilitate regular washing during working hours.

In addition shower facilities are provided at Group locations for employees to use at the end of their shift.

4.2.12. Smoking at Work

The Group has prohibited smoking in all Group (and customer) premises in accordance with legislative requirements. Furthermore, the Group considers vehicles to be work premises and the smoking ban applies to all Group vehicles (owned or leased) and employee vehicles used on Group business (refer to Policy CM/1.09 Smoking at Work Policy).

4.2.13. Absence from Work

The Group is committed to improving the health, well-being and attendance of all employees. The Group will support and help employees who have genuine grounds for absence whatever reason. This support includes alternative work if the employee is unable to carry out their normal duties and compassionate and other leave for necessary absences not caused by sickness (refer to Policy CM/1.25 Absence Policy and Procedure CM/3.16 Sick Leave and CM/3.17 Short & Long Term Absence).

4.2.14. Method Statements

Formal method statements (safe working procedures) will be prepared in writing where the risk is particularly high. The method statements will provide site specific information on the task to be undertaken including site set up, areas of responsibility and will detail a



clear sequence of work that would be followed in order to undertake the given task safely and environmentally compliant.

4.2.15. Co-operation with Customers

Employees will always familiarise themselves with customer site rules & regulations and/or procedures when first attending site, in particular general site access, emergency procedures and high risk work activities including permit to work systems. Customers' site procedures and specific instructions will be followed at all times.

If required the employee (or Team Leader/Supervisor) will attend any site meetings or inform other contractors working in the direct vicinity of the activity being carried out of the specific risks and requirements of the work being undertaken.

4.2.16. Sub-Contractors

It is the Group's policy not to sub-contract work unless absolutely necessary. Where used, sub-contractors are engaged primarily on the basis of their technical capability, though due regard is also taken of health and safety and environmental performance. Serious breaches of health and safety and the contractor's capability for specific risks will be taken into account during the selection process. A formal assessment process is in place including the use of a health, safety, environmental and quality questionnaire (Refer to Procedure CM/5.02 Approved Supplier)

The Group has developed a Contractors' Code of Practice for all contractors working on Group sites or working on customers' sites on behalf of the Group. (Refer to Procedure CM/4.07 Managing Contractors and Sub-contractors).

4.2.17. Permits-to-Work

The Group operates a permit-to-work system within its locations wherever there is a special need to co-ordinate potentially hazardous situations. The location manager will carry out a risk assessment of the work activity/process and consider whether the hazards and risks identified would be further reduced by a permit-to-work. The Group considers that a permit-to-work system is an extension of a safe system of work but not a replacement for one (refer to Procedure CM/4.09 Permits to Work).

4.2.18. Confined Space Working

The Group's policy on confined spaces is that no person shall enter a confined space unless specified parameters are met (refer to Procedure CM/4.06 Confined Space Working). Confined space working is a specified activity requiring its own safe system of work.

The Group has identified certain operations that require employees to enter and work in a confined space. Moreover, as part of its business activities, the Group offers a service for work requiring confined space entry e.g. tank and interceptor cleaning and inspection. As such the Group has fully trained personnel and specialist equipment available for all aspects of confined space working.

4.2.19. Personal Protective Equipment (PPE)

Appropriate personal protective equipment will be issued to employees as and when necessary for work activities as required by the Personal Protective Equipment at Work Regulations 1992. A written record detailing what PPE has been issued will be signed by the employee on receipt of the equipment and the hard copy kept on file.

Training will be provided for employees on the safe use, storage and maintenance of the relevant equipment before issue.



Employees have a legal duty to wear PPE as specified in relevant site rules, risk assessments and method statements. (Refer to Procedure CM/4.13 Personal Protective Equipment).

4.2.20. Hazardous Substances

The Group carries out assessments of any substances used, in accordance with the Control of Substances Hazardous to Health (CoSHH) Regulations 2004 (as amended), the information being recorded and held on file.

Assessments consider engineering controls, storage, handling, and aspects of use, exposure, workers health, and emergency actions. Departmental Managers will brief employees on any hazard or substance precautions, with written records being located in an accessible location within each department.

An inventory of all substances and materials hazardous to health is held locally at each Group site. (Refer to Procedure CM/4.08 CoSHH).

4.2.21. Work Equipment

All work equipment (including electrical equipment) used at work, as part of the Group's undertaking will comply with the Provision and Use of Work Equipment Regulations (PUWER) 1998. Furthermore all work equipment requiring statutory inspection will comply with the relevant legislation (refer to Policy CM/1.12 Policy on Statutory Inspections, CM/4.20 Work Equipment Safety and see specific sections below).

No employee will use work equipment for which they have not received specific training. No employee will knowingly misuse work equipment or remove any guards that are in place to minimise a specified risk.

All work equipment will be maintained and inspected at suitable intervals either internally by a competent person or by specialist external companies. The frequency of work equipment maintenance or inspection will be based on manufacturers' guidance and industry best practice. Any maintenance / inspections undertaken on Group equipment will be formally recorded with a hard copy left on file.

Checklists are in place for the routine inspection of tools and equipment and also for first-use drivers' vehicle checks.

A formal defect reporting system is in place for reporting any faults or damage found on any equipment.

4.2.22. Lifting Operations and Lifting Equipment

All lifting equipment (including safety harnesses, tripods, winches etc) used at work, as part of the Group's undertaking will comply with the Lifting Operations and Lifting Equipment Regulations (LOLER) 1998.

Departmental managers are responsible for ensuring all such work equipment is inspected according to the legislative requirements. The Group Health & Safety Manager will monitor adherence to the schedule of inspection. (Refer to Procedure CM/4.32 Lifting Operations (LOLER)).

4.2.23. Pressure Systems

All pressure systems to which the Pressure Systems Safety Regulations 2000 (PSSR 2000) apply will be inspected according to the written scheme.

Departmental managers are responsible for ensuring all such work equipment is inspected according to the legislative requirements. The Group Health & Safety



Manager will monitor adherence to the schedule of inspection. (Refer to Procedure CM/4.33 Pressure Systems).

4.2.24. Electrical Equipment

All electrical equipment (both fixed installations and portable equipment) will be inspected and tested according to the requirements of the Electricity at Work Regulations (EAW) 1989 and associated HSE guidance.

Departmental managers are responsible for ensuring all such work equipment is inspected / tested at the appropriate interval. The Group Health & Safety Manager will monitor adherence to the schedule of inspection. (Refer to Procedure CM/4.31 Electrical Safety).

4.2.25. Road Safety, Vehicle Management and Workplace Transport

A large part of the Group's business activities relies on road transport and as such the Group has established a policy for road safety (Refer to Policy CM/1.23 Road Safety Policy).

As transport plays a key role in the Group's business activities and the Group recognises the hazards from moving vehicles and mobile plant. Workplace transport risk assessments have been carried out on all Group sites and actions taken to control any risks.

It is Group policy that all vehicles and trailers shall be kept in a roadworthy condition, meet all legal requirements and all equipment shall be fit for its purpose. The Group ensures that all its vehicles are regularly inspected, serviced and maintained according to DVSA guidelines not only to ensure compliance with Operator's Licence requirements but also to protect the health and safety of drivers, operators and other road users, deliver environmental targets and ensure the quality assurance standards necessary to meet our customers' needs. (Refer to Policy CM/1.21 Vehicle Inspection & Testing Policy and Procedure CM/4.22 LGV Driver Vehicle First-use Checks plus associated transport procedures).

The Group also requires all road traffic collisions and vehicle-related incidents including property damage involving Group vehicles to be reported (Refer to Procedure CM/4.02 Vehicle Collision Procedure).

4.2.26. Accident & Incident Reporting

All accidents involving injuries to employees MUST be reported to the line manager and the details recorded in the site accident book. The Departmental Manager will carry out the initial investigation and forward copies of the accident report and investigation report forms to the Group Health and Safety Manager. All time-losing injuries and serious accidents will be investigated by the Group Health and Safety Manager.

Certain accidents defined under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) 2013 (as amended) must be reported to the HSE. This report will be made by the Departmental Manager or Group Health & Safety Manager.

All such reportable accidents / incidents will be investigated by the Group Health & Safety Manager and reported to the Board of Directors. (Refer to Procedure CM/4.03 Accident & Incident Reporting).

4.2.27. Safety Concerns and Near Miss Reporting

The Group is committed to improving safety performance and as such encourages all employees to report all safety concerns and near misses. The Group believes that if



safety concerns are raised and near misses are routinely reported and action is taken to follow them up, it will help improve safety for everyone. The Group has established a safety concern/near miss reporting system which is designed not to lay blame but to help prevent a similar or worse occurrence from happening again. (Refer to Procedure CM/4.04 Safety Concern & Near Miss Reporting).

4.2.28. First Aid

Adequate first aid provision will be made at every place of work occupied by the Group according to the Health and Safety (First-Aid) Regulations 1981 (as amended). A first aid needs assessment has been carried out at each Group location to determine the number of first aiders and type of first aid equipment required. The location of first aider and first aid box is displayed at each location.

In addition all drivers are supplied with a travel first aid kit and training carried out where appropriate. (Refer to Procedure CM/4.10 First Aid).

4.2.29. Manual Handling

An assessment of the manual handling risks of all work activities is carried out as required by the Manual Handling Operations Regulations 1992 (as amended 2002). The method of work is adapted to minimise manual handling risks wherever possible, including use of alternative lifting and carrying methods. Group employees are advised not to manually handle loads which they feel incapable of moving safely and to report such situations to their line manager so that alternative arrangements can be made. (Refer to Procedure CM/4.16 Manual Handling).

4.2.30. Working at Height

The Group follows the working at height hierarchy detailed in the Work at Height Regulations 2005 (as amended). The generic risk assessments carried out for all activities consider working at height including working at ground level over interceptors, manholes etc. and the necessary control measures are put in place where required. Where working at height is absolutely necessary then specific risk assessments will be carried out and a safe operating procedure written for the task prior to commencement of any work (Refer to Procedure CM/4.29 Working at Height).

4.2.31. Noise at Work

The Group recognises its duty under the Control of Noise at Work Regulations 2005 to ensure that the risk to employees' hearing is reduced to the lowest level that is reasonably practicable to achieve (refer to Procedure CM/4.19 Noise Control).

To this end noise assessments have been carried out at all Group locations and during work activities. Ear protection zones have been established and hearing protection provided or made available where required.

4.2.32. Fire Safety & Emergency Procedures

The Group recognises fire as a significant business risk and takes its responsibility for fire safety extremely seriously. The Regulatory Reform (Fire Safety) Order 2005 [and The *Fire (Scotland) Act 2005* (as amended)] requires a responsible person to be designated to ensure that fire safety duties are undertaken. The Group has appointed the Group Health & Safety Manager as the competent person to carry out the preventive and protective measures required by the Order. (Refer to Policy CM/1.27 Fire Safety Policy Statement).

Fire risk assessments have been carried for each Group location and appropriate procedures put in place to manage those risks.

Each Group location has an Emergency Plan which takes into account all feasible incidents and emergencies which could occur on and around the site. These possible



incidents and emergencies are listed within the Emergency Plan and procedures developed to deal with any of them should they arise.

The Emergency Plan must include (where possible) methods of minimising harm to humans, harm to the environment and harm to property.

Departmental Managers are responsible for keeping areas under their control safe from fire, ensuring that all fire prevention systems and fire fighting equipment are inspected and tested according to the regulations and ensuring that their employees are trained in proper fire prevention practices and emergency procedures.

All employees have a duty to conduct their operations in such a way as to minimize the risk of fire. This involves compliance with the Group's no smoking policy, keeping combustible materials separate from sources of ignition and avoiding unnecessary accumulation of combustible materials. (Refer to Procedure CM/4.18 Fire Safety).

4.2.33. Lone Working

Many of the Group's routine work activities involve single person operation and as such lone working is involved. Arrangements have been put in place e.g. provision of a mobile phone and instructions to employees to contact the Depot at regular intervals; vehicles fitted with tracker devices for Depot Management to check on vehicle locations and time spent on site. More hazardous activities are usually carried out by at least two persons including a team leader.

4.2.34. Carriage of Dangerous Goods

The Group is required to carry dangerous goods as part of its core business activities. The Group operates to the legislative requirements (currently ADR 2015 including ADR Changes in 2017) and the Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations 2009 (as amended). The Group has trained relevant drivers and appointed Dangerous Goods Safety Advisers (DGSA) in accordance with the regulations (refer to Procedure CM/4.24 Dangerous Goods).

4.2.35. Ergonomics and Office Working

The Group recognises that the *Health and Safety (Display Screen Equipment) Regulations 1992 (DSE)* apply only to 'workstations', 'users' and 'operators' as defined in the regulations. For the majority of Group employees, although display screen equipment is being used, the regulations do not apply.

Where the regulations do apply, Departmental Managers are responsible for ensuring that a suitable and sufficient risk assessment is carried out in relation to each workstation under their control. The user will carry out a self-assessment of their workstation which will be reviewed by a competent person and any issues and subsequent corrective actions will be discussed with the Departmental Manager (refer to Procedure CM/4.17 Display Screen Equipment).

4.2.36. Occupational Stress

Stress is not in itself an illness but can result in psychological illness and may contribute to physical illness. It can be considered as the adverse reaction people have to excessive pressure or other types of demand placed upon them. The Group recognises that workplace stress is a health and safety issue and acknowledges the importance of identifying and reducing workplace stressors.

4.2.37. Asbestos – Duty to Manage

In compliance with the Control of Asbestos Regulations 2012 and the Duty to Manage Asbestos Containing Materials (ACM), the Group seeks to minimise the risks to health where asbestos is or may be present in any Group property.



The Group has made every effort to identify asbestos and asbestos containing materials in each of its premises and has recorded the location in respective site plans.

The Group has an Asbestos Management Plan in place to manage any risk of anyone being exposed to these materials and has made all employees aware of the plan.

The Group is not a licensed asbestos contractor but does respond to fly-tipped asbestos and also transport and dispose of asbestos waste at its permitted landfill facility. As such relevant personnel are briefed about the hazards of asbestos and asbestos containing materials together with appropriate training (refer to Policy CM/1.17 Asbestos Management).

4.3. Measuring and Reviewing Safety Performance

4.3.1. Health Surveillance

The Group has appointed external occupational health professionals to monitor the health of all employees who might be exposed to hazardous substances, noise or occupational disease as identified by risk assessment.

4.3.2. Accident, Incident and Near Miss Reporting

The Group has implemented procedures and processes to ensure that all accidents, incidents (with or without injury), vehicle-related collisions, property damage, near misses and safety concerns are reported, reviewed and the results analysed to identify trends and areas for further action (whether negative or positive).

All accident/incident data is collated and reviewed for trends at site and Group level. This data is reported to the Board of Directors on a monthly basis by the Group Health & Safety Manager.

4.3.3. Health and Safety Auditing

An internal health and safety auditing programme is developed which ensures every Group location is audited by the Group Health & Safety Manager at least once every twelve months.

The Group has developed an audit process to verify that the health and safety management system is operated correctly at all levels within the Group. The audit examines physical conditions and systems against established standards. The audit ensures corrective actions and preventative measures are identified and implemented within agreed timescales.

4.3.4. Management Review

The Group Health & Safety Manager formally reviews, on an annual basis, the Safety Management System and the Health & Safety Policy to ensure their effectiveness and compliance with current legislation. This review is submitted to the Board of Directors.

Amendments may however be introduced at any time as part of the Group's policy of continuous improvement.



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