 <p>Integrated Management System</p>	Section reference:	IMS/03-34 – Health and Safety policy (Including Statement of Intent)
	Original issue:	Sept 2016
	Revision number:	2
	Revision date:	Dec 2023
	Approved by:	Cath Jackson

# Health and Safety Policy Statement


## Health and Safety at Work etc. Act 1974

### Statement of Intent

Waste Efficiency Ltd recognize the importance of health and safety at work and the benefits that to our workforce, Clients and other persons who may be affected by our activities, the premises that we have control over, and for this organization as a whole. Accordingly, we will ensure the health, safety and welfare of both our employees and others so far as is reasonably practicable. To achieve this we have the following objectives:

- to provide sufficient resources for the implementation of this policy;
- to provide adequate control of the health and safety risks arising from our work activities;
- to consult with our employees on matters affecting their health and safety;
- to provide and maintain safe plant and equipment;
- to ensure safe handling and use of substances;
- to provide information, instruction and supervision for employees;
- to pursue employee competence by identifying and addressing their training needs;
- to prevent accidents and cases of work-related ill health;
- to maintain safe and healthy working conditions;
- to meet and where possible exceed all Government published rules and guidelines on Pandemic situations such as COVID 19;
- To provide specific guidance and training to all staff members on policy and procedures for dealing with Pandemic situations such as COVID 19; and
- to review and revise this policy in line with changes in circumstances and on an annual basis as a minimum.

Signed



Tim Reed, Managing Director

Date: January 2024

Min Review date: January 2025  
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# ORGANISATIONAL RESPONSIBILITIES

## Responsibilities

1. Overall and final responsibility for health and safety is that of:

Tim Reed, Managing Director

2. Day-to-day responsibility for ensuring this policy is put into practice is delegated to

Cath Jackson, SHEQ Compliance Manager

3. To ensure health and safety standards are maintained and improved, the following have responsibility in the following areas:

Name	Team	Responsibility
Jack Hesketh Rob Case and Owien Harriott- Davis, Field Service supervisors	- Operations Team	- Recruitment, appraisal, discipline and overall performance of onsite staff for safe working;
Cath Jackson (NEBOSH) Pete Clutterbuck (NEBOSH)	- SHEQ Manager  - Technical Director	- Provision of technical advice and support for site-based activities;
Claire Short	- HR Team	- Safety and training document retention.

4. All employees have to:

Co-operate with supervisors and managers on health and safety matters;  
Not interfere with anything provided to safeguard their health and safety;  
Take reasonable care of their own, and others health and safety; and  
Report all health and safety concerns to an appropriate person (as detailed in this policy statement).

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### **Risks arising from our work activities**

Risks arising from our work activities will be formally considered as detailed in The Risk Assessment Procedure IMS05-263. From this, Risk Assessments will be developed and reviewed annually, on a rolling program, or triggered following an incident, a change in legislation or when a significant process has occurred.

The Operations Team will be responsible for ensuring the approved actions are effectively implemented by employees.

From information collated from various monitoring activities (active and reactive), the Health & Safety Committee will check that the implemented actions have removed or reduced the risks as appropriate.

### **Consultation with employees**

It is a legal duty to consult with all employees. In accordance with The Health and Safety (Consultation with Employees) Regulations 1996.

Waste Efficiency carries out this consultation with employees during regular site visits. A Site Visit Report, IMS05-59 is generated which records any concerns that are raised by employees.

### **Safe plant and equipment**

#### **Purchase control**

Waste Efficiency operates a system whereby any plant and equipment to be purchased or leased is only obtained via reputable suppliers. This process is carried

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out under three documents; the Supplier Approval Process IMS05-27, the Supplier Approval Questionnaire IMS053-25 and Supplier Management Procedure IMS05-36.

### **Maintenance**

The Operations Team is responsible for identifying all equipment and plant which requires maintenance. This is by ensuring that any lease or hire agreement will only be considered if the hirer provides maintenance as an integral part of the contract or have a maintenance option in place. Equipment owned by Waste Efficiency is maintained by contractors. It is the responsibility of the approved maintenance contractor to ensure effective procedures for maintenance is drawn up.

Simple equipment and machine defects are reported by Waste Efficiency operators and recorded on the Reporting Equipment and Machine Defects Procedure form IMS05-136.

### **Pre-Use Inspection**

All equipment will be operated following a process that includes the manufacturer's manual and instruction given by the Operations Team. Operating staff are to carry out a visual inspection of their electrical equipment prior to use.

### **Reporting defects**

Any Waste Efficiency employee who identifies a problem with equipment/plant are to report the defect immediately to their site manager. The site manager will then liaise with the Operations Team to obtain authority for further action, such as repair or replacement. Where the cost is foreseeably significant the matter is escalated to the Operations Director for authority to proceed.

Where Waste Efficiency employees are using Clients' equipment at their premises and identify problems with it, they are to inform the client of the defect; it is the

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responsibility of the Client to ensure that their equipment is maintained in a safe and working state. Waste Efficiency employees should not use defected equipment/plant until informed by authorized personnel that the defect has been resolved.

## **Safe handling and use of substances**

### **COSHH assessment**

The Operations Team is initially responsible for identifying substances that require a COSHH assessment. The Operations Team will have responsibility for completing COSHH assessments. This implementation to reduce risks identified in these assessments is the responsibility of the Operations Team. All COSHH assessments will be reviewed where there has been a significant change in legislation, health surveillance indicates, as remedial action following an incident or on a rolling program every two years.

### **Information**

Employees who will be handling substances that pose a risk to health will be informed about each relevant COSHH assessment so that the hazards and the method that they are controlled are fully understood. A copy of each Safety Data Sheet (SDS) and COSHH assessment will be held in the appropriate site manuals. This may be in electronic or paper form. The Operations Team is responsible for training and ensuring that the information has been fully understood by the appropriate employees.

### **Approved list of substances**

When the requirement to purchase a new substance occurs, a COSHH assessment is carried out prior to being introduced to the workplace. The Operations Team is responsible for this.

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### Information, instruction and supervision

#### **Health and Safety Law**

The Health and Safety Law poster is displayed at the Head Office, Worcester. Employees based at Clients' sites have access to this in the site manual in the form of a leaflet or pocket card.

#### **Competent person to assist**

Pete Clutterbuck and Cath Jackson have qualified to NEBOSH General Certificate level and is Waste Efficiency's 'Competent Person'.

The role is assisted by Jack Hesketh, Rob Case and Owien Harriott-Davis who is qualified to IOSH Managing Safely Certificate level, and by the Health & Safety Committee.

#### **Young workers/trainees**

The policy of Waste Efficiency has adopted a blanket rule prohibiting the employment of young persons (non-adults) at remote Client sites. There is consideration regarding the Equality Act 2010 as age is a protected characteristic. However, such a prohibition of employment based on age does not incur breach of the Act where it is possible to show that the decision to do so is objectively justified, such as there is a good reason for the action. In this case, due to inherent lack of experience or training and the inability to recognize hazards and respond accordingly coupled with the increased reliance on self-supervision and competency levels, the policy is valid.

Young people may be taken on as trainees in administrative roles at head office. The environment is relatively forgiving, and close supervision is possible. Waste Efficiency will ensure that a specific young person risk assessment is completed prior to any such person commencing a role. The resulting assessment would be brought to the attention of the young person's parents/guardians.

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### **Client sites**

The Operations Team is responsible for ensuring that our employees working at client's sites are given relevant safety information. The foundation for this information is the Site manual. The Operations Director is responsible for ensuring that any amendments or revisions made are formally included in an update for the appropriate site manual(s).

## **Competency for tasks and training**

### **Induction training**

Induction training for all client site-based employees will be arranged by the Operations Team, the Operations Director will arrange induction training for head office employees.

Employee's induction shall be recorded on the site specific training matrix IMS03-07. Records are to be retained stating the specific equipment that employees are trained on. There must be a follow up training and competence check questionnaire completed with all employees within 2 weeks of their start date, this can be found within the IMS03-07 training Matrix file and is set specially one for Cleaning and one for Waste employees.

### **Job specific training**

Job specific training will be provided by the Operations Team at smaller client sites. Where the site is deemed large enough there will be a Site Manager employed by Waste Efficiency. Where a Site Manager is employed, they must ensure that job specific training is given prior to an employee commencing work.

When a new job specific process is identified it is the responsibility of the Operations Team to ensure that training needs are arranged.

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On the job training shall be recorded on the training record form IMS03-08.

### **Additional training**

Roles requiring additional training are identified based on a system of identifying skills from the Training Matrix. Specific safety training may be required when:

- A person gets promoted or changes to a job with responsibility for the safety of employees, such as managers and supervisors;
- A person takes on a role as a safety advisor or specialist.

Any additional training must be recorded on the IMS03-08 training record, or if training provided by an external trainer then a certificate of training must be received and placed within the employees training records on Bright HR.

### **Record keeping**

Training records are kept electronically as scanned copies of written records within Bright HR and are the responsibility of the HR Team.

## **Accidents, first aid and work-related ill-health**

### **Health surveillance**

Health surveillance is monitored on a regular basis using the Site Visit Report IMS/05-59 and carried out by the Operations Team. The completed form is dispatched to the HR Team for recording and retention. The Operations Manager will review the results and communicate all relevant data in the monthly Operations Meetings. Observations raised during individual interviews are discussed and managed. Key issues raised are; dermatitis, noise, vibration and/or inhalation of airborne agents.

### **First Aid**

A First Aid box is available in the Head Office. The Waste Efficiency Head office is considered to be a low-risk workplace therefore we have a nominated responsible



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person who is based at Head Office, who will take charge of all first aid arrangements and be able to call emergency services if required.

Jessika Wild

On Client sites first aid facilities will be provided by the client and instructed upon within the Clients' Site Induction Process.

### **Accident reporting/recording**

All accidents and cases of work-related ill-health will be recorded using the Accident and Near Miss Reporting, RIDDOR Reporting and Accident Data Processing process IMS05-262. The details will be recorded using the Accident Report Form IMS03-32 Accident Investigation form IMS03-33. This information will then be recorded within the Accident and Near Misses Register.

The SHEQ Manager is responsible for reporting accidents, diseases and dangerous occurrences to the enforcing authority. Records must be kept for 3 years.

IMS05-262 Accident & Near Miss Reporting, RIDDOR Reporting and Accident Data processing must be followed.

## **Monitoring**

### **Active measuring**

To ensure that our working conditions and safe working practices are being correctly carried out, the Operations Team conducts regular visits to each Client site; these are recorded on the Site Visit Reports IMS/05-59.

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### **Reactive measuring**

Following a reported accident, the Operations Team or the relevant Site Manager will conduct an investigation. This must be recorded on IMS03-33 and IMS05-262 process must be followed.

## **Emergency procedures**

### **Head Office**

The SHEQ Compliance Manager is responsible for ensuring that the FRA (Fire Risk Assessment) is carried out for the head office.

Fire extinguishers will be maintained annually by an Approved Contractor in accordance with the lease agreement.

The alarms are tested on a weekly basis by the landlord of the property.

Waste Efficiency carries out emergency evacuation drills annually.

### **Client sites**

The Emergency procedures on Clients sites are the responsibility of the client. Waste Efficiency personnel are familiar with them and adhere to the respective drills.

## **Our key risk areas**

### **Asbestos**

Waste Efficiency acknowledges that some personnel could unintentionally be exposed to low-levels of ACMs (Asbestos Containing Materials). This risk is limited to Environmental Operatives. To address the risks the appropriate employees receive a specific training course and records are retained on Bright HR.

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### **Chemicals**

Legislation requires adequate control of exposure to materials in the workplace that cause ill health. This is embodied in The Control of Substances Hazardous to Health Regulations and Waste Efficiency engage in the following actions:

- identifying which harmful substances may be present in the workplace;
- deciding how workers might be exposed to them and be harmed;
- looking at what measures are in place to prevent this harm and deciding whether enough is being done;
- providing information, instruction and training;
- in appropriate cases, providing health surveillance.

### **Occupational driving**

Waste Efficiency have a small number of employees who are required to drive as part of their normal occupation. It is accepted that there are various risks to this role, which are addressed in the Employee Handbook.

### **Confined spaces**

Waste Efficiency acknowledges that there is an occasional need for our employees to enter confined spaces. This is limited to machinery with charge boxes, such as material balers. When this requirement is identified, before any employee enters a confined space the Operations Team must be notified and relevant training for confined space entry must be obtained for all employees who are required to enter confined spaces, this training must be recorded, and all records stored on Bright HR

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### **Display screen equipment**

Waste Efficiency carry out DSE Assessments on all personnel classed as users. Completed records are retained under the control of the HR Team.

### **Electricity**

Electrical equipment will be checked and maintained to ensure continual safe use. The Operations team managers and some site based employees are trained to carry out PAT (Portable Appliance Testing) and carries out checks on a regular basis. All training records for PAT Testing are stored on Bright HR

### **Machinery**

Waste Efficiency identifies the requirement to preventing incidents with moving machinery and access to dangerous parts of machinery when being used by our employees. Suitable training will be given prior to an employee commencing work with a machine and records retained on Bright HR.

### **Manual handling**

Waste Efficiency recognize that manual handling injuries have serious implications for the employer and the person who has been injured. Manual handling is a daily and constant risk and can include awkward posture, repetitive movement and over-exertion - previous pre-existing injury, possibly sustained outside the workplace can increase the risk.

Accordingly, employees will avoid or reduce the risk as reasonably practicable. Where it is not possible to avoid handling a load, the task will be assessed so that sensible control measures can be implemented; and will take account of:

- individual capability;
- the nature of the load;
- environmental conditions;

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- training; and,
- work organization.

### **Noise**

Before new equipment is purchased, an evaluation is carried out as to its suitability. One of the aspects of this evaluation will be the noise levels. On clients sites the appropriate areas will be the responsibility of the client who will ensure protective measures are taken. Waste Efficiency employees in these areas will comply; such as wearing of ear protection systems.

### **Slips, trips and falls**

Slips, trips and falls are a risk on all sites. Waste Efficiency, ensure as far as reasonably practicable that measures are taken to reduce the likelihood of slips, trips and falls. Where potential risks are identified they will be controlled in the following ways:

- Prevent floors from getting wet or contaminated in the first place.
- Have procedures in place for both routine and responsive cleaning.
- If a spillage does happen, clean it up quickly.
- If floors are left wet after cleaning, stop anyone walking on them until they are dry and use the right cleaning methods and products.

### **Lone working**

Management, Sales and Operatives may visit or work on client's sites; on these occasions they will register their arrival and departure according to the client's rules. In other cases of possible lone working, specific assessments will be made. Lone working when driving on business is addressed under the Driving Policy.

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### **Outdoor working**

Working outdoors does have an effect on an individual's performance, in extreme conditions Waste Efficiency pursue effective ways of managing these environments by introducing some simple administrative controls such as;

#### **Cold environments**

- Warm PPE (Personal Protective Equipment) issued is appropriate
- Provision of in-door facilities will be made available, and increased shorter but more frequent breaks) for warming up, and encourage the drinking of warm fluids,
- Introduce more frequent rest breaks,
- Consideration to the task to be postponed until a more suitable weather window.

#### **Hot environments**

- Reschedule the task to a cooler time of the day,
- Provide more frequent rest breaks,
- Provide free access to cool drinking water.

### **Workplace transport**

There is a requirement for Waste Efficiency Staff to operate FLT's (Fork Lift Trucks) on some Clients' sites. To ensure safe driving and working Waste Efficiency will make sure that the FLT's and the manner in which they are controlled.

#### **Safe vehicle**

- Ensure vehicles are suitable for the purpose for which they are used.
- Maintain vehicles correctly, particular attention is to be made of the braking system, steering, tyres, lights, mirrors and safety systems.
- Provide reversing aids where appropriate.

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- Fit rollover protective structures and use seat belts where fitted.

### Safe driver

- Ensure that personnel are trained, competent and have been issued a letter of authority from Waste Efficiency to use the appropriate FLT.
- Reassess all FLT at regular intervals, and re-issue authority every three years.

### Working at Height

Waste Efficiency will attempt to remove the need to WAH (Work at Height). When this is not possible we will follow the recommendations given in the HSE's Working at height – A brief guide. The process to reduce the risks are;

- where work at height cannot be easily avoided, prevent falls using either an existing place of work that is already safe or the right type of equipment;
- Minimize the distance and consequences of a fall, by using the right type of equipment where the risk cannot be eliminated;
- A Risk Assessment will be carried out prior to any WAH task. A copy of this will be retained on the appropriate site.

## ARRANGEMENTS

Date reviewed	Reason for Revision	Next date Revision	Process step	Responsible Person
13 Sep 16	Creation	Jan 17	Creation	Health and Safety Advisor
03 Jan 17	Review	Jan 18	Review	Technical Manager
13 Feb 17	Approved	Jan 18	Approval	Operations Director
03 Jan 18	Review	Jan 19	Review	Operations Manager
03 Jan 18	Approved	Jan 19	Approval	Operations Director
03 Jan 19	Review	Jan 20	Review	Operations Manager
03 Jan 19	Approved	Jan 20	Approval	Operations Director
10 Jan 20	Review	Jan 21	Revision	Ops & HR Team
10 Jan 20	Approved	Jan 21	Approval	Managing Director
10 Jan 21	Review	Jan 22	Review	Ops & HR Team
10 Jan 21	Approved	Jan 22	Approval	Managing Director
18 May 23	Review	May 24	Review	SHEQ Manager
1 <sup>st</sup> Jan 24	Review	Jan 25	Review	SHEQ Manager