



Cleansing Service Group Ltd

HEALTH & SAFETY POLICY DOCUMENT

**Issue: January 2017
Review: 1 year**

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SECTION 1

Corporate Health & Safety Policy Statement

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COMMITMENT

The Group is committed to ensuring the safety and health of its employees, visitors and the public, so far as is reasonably practicable. It acts positively, where it can, to prevent injury, ill health, damage and loss arising from its activities. The Group fully recognises its statutory duties and takes the necessary measures to ensure compliance with health & safety legislation is the minimum level of achievement. The Board of Directors will ensure the strategic direction of the Group pays due regard to health, safety and welfare and any decisions include health and safety along with other business objectives.

The Group recognises that the effective prevention of accidents depends as much on robust management systems and committed attitudes to safety as on the design, operation and maintenance of plant and equipment. Furthermore it recognises that the principal components of an effective health and safety system are the visible leadership and commitment of managers and the active participation of all employees. To this end it seeks to encourage employee participation in, and contribution to, the establishment and observance of safe working practices. The Group will ensure that contractors who undertake any activities on its behalf meet the Group's requirements regarding health, safety and welfare matters.

RESPONSIBILITIES

Overall responsibility lies with the Managing Director and day to day implementation is delegated through every level from Senior Managers to individual employees. The Board establishes the performance standards to which the Group strives. A Health & Safety professional is appointed to lead the efforts towards achieving those standards.

ARRANGEMENTS

This Policy should be read in conjunction with Group Procedure CM/4.01 Health & Safety Management which outlines the organisation and arrangements in place to ensure the Group achieves its stated health and safety objectives. This Policy shall be included in the induction of all new employees and is available in the Employee's Induction Folder and on the Group intranet.

PERFORMANCE & REVIEW

The Group is committed to continuous improvement in its health and safety performance. This performance is measured against established standards and reviewed by the Directors at each Board Meeting. Part of this review process includes the setting of specific targets for further improvements. An appropriate audit process forms part of the overall management system with the audit results being reviewed by the Board. This Policy shall be reviewed whenever circumstances require it such as changes to legislation, Group activities or at least annually.

EXTERNAL RELATIONS

This policy is posted on the Group's website and the Group welcomes the opportunity to discuss health and safety issues with customers and other external bodies whilst encouraging audits of its facilities.

This Policy has been authorised by:



Neil Richards,
Managing Director, Cleansing Service Group Ltd.

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SECTION: POLICIES

OWNER: HEALTH AND SAFETY MANAGER

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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,
- Employee consultation is facilitated through Departmental Communications Meetings and Joint Consultative Committee Meetings,
- Competent health & safety advice, support and leadership is available through the provision of an internal Health and Safety Practitioner.



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SECTION 3

Health & Safety Responsibilities

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POSITION	RESPONSIBILITY
<p>EXECUTIVE TEAM:</p> <p>MANAGING DIRECTOR</p> <p>FINANCE DIRECTOR</p> <p>HR DIRECTOR</p>	<p>Understanding the main requirements of the Health and Safety at Work etc Act 1974. Developing Group health and safety strategies and objectives and setting Group policy and direction.</p> <p>Reviewing the Group's health and safety performance and the effectiveness of the policy.</p> <p>Ensuring that equal importance is applied to health and safety as to other business functions.</p> <p>Consider the health and safety implications of change i.e. introduction of new business activities and/or processes.</p> <p>Allocating the necessary resources for health, safety and welfare.</p> <p>Ensuring that a competent person is employed to assist them in carrying out their statutory responsibilities.</p> <p>Ensuring that the organisational structure is appropriate to manage the health, safety and welfare of the Group.</p> <p>Establishing effective 'downward' communication systems.</p> <p>Ensuring that the same management standards are applied to health and safety issues as to other management functions.</p> <p>Ensuring that responsibilities for health and safety are integrated into the management structure and that managers are adequately trained and capable.</p> <p>Reviewing the performance of their direct reports including health and safety.</p>
<p>SENIOR MANAGERS</p>	<p>Understanding the main requirements of the Health and Safety at Work etc Act 1974. Consider the health and safety implications of introducing new working practices or new personnel.</p> <p>Ensuring that adequate resources are made available for health, safety and welfare within their areas of responsibilities.</p> <p>Ensuring the effective implementation of Group policy.</p> <p>Ensuring the Executive Directors are informed of progress and developments.</p> <p>Ensuring that any major health and safety failure is reported as soon as possible to the Directors and to the H&S Manager.</p> <p>Carrying out audits of their areas of responsibilities / organising audits to be carried out.</p> <p>Supporting the Directors in policy-setting.</p> <p>Reviewing the performance of their direct reports including health and safety.</p>
<p>HEALTH & SAFETY MANAGER</p>	<p>Understanding the main requirements of the Health and Safety at Work etc Act 1974 and legislation applicable to Group operations.</p> <p>Making Directors and Managers aware of their responsibilities.</p> <p>Identifying and managing health and safety risks within the Group's activities.</p> <p>Ensuring that suitable and sufficient safety-related training is provided at all levels of the organisation.</p> <p>Advising Directors and Management on the implementation of Group policy.</p> <p>Monitoring, reporting and reviewing the Group's safety performance.</p> <p>Joint investigation of accidents with line management / employee representatives.</p> <p>Assisting in preparation of safe systems of work.</p> <p>Reviewing and revising the Corporate Health and Safety Policy.</p> <p>Reviewing new legislation and guidance, advising senior management on their impact.</p> <p>Reviewing training records.</p> <p>Conducting audits of the effectiveness of the management processes and risk controls for health, safety and welfare within all areas of the Group.</p> <p>Participation in health and safety meetings as necessary.</p> <p>Recommending and implementing improvements to procedures and systems where appropriate.</p> <p>Leadership of all health and safety activities across the Group.</p>

POSITION	RESPONSIBILITY
DEPARTMENTAL / DEPOT / SITE MANAGERS	<p>Understanding Group policies and procedures and ensuring that these policies and procedures are distributed to all employees within their areas of responsibility.</p> <p>Monitoring the implementation of Group policies.</p> <p>Ensuring that supervisors are properly trained and instructed as to their duties and responsibilities.</p> <p>Ensuring that supervisors carry out their assigned responsibilities and review their performance.</p> <p>Making recommendations for improving performance.</p> <p>Allocating the necessary resources within their control.</p> <p>Ensuring that accidents and near-misses are reported, recorded and investigated.</p> <p>Drawing up annual action plans for health and safety.</p> <p>Setting personal objectives and targets.</p> <p>Monitoring of any contractors/sub-contractors carrying out work for customers on behalf of the Group.</p> <p>Keeping relevant documentation.</p> <p>Carrying out audits of their areas of responsibilities and undertaking workplace inspections.</p> <p>Ensuring that equipment etc. is maintained in a safe condition.</p> <p>Ensuring that appropriate provisions are in place for emergencies (fire, first aid etc).</p> <p>Ensure that health and safety issues are discussed in departmental communications meetings.</p> <p>Engage the workforce in the promotion and achievement of safe and healthy conditions.</p>
SUPERVISORS	<p>Understanding the Group policy and procedures.</p> <p>Ensuring that employees are adequately trained, instructed and informed.</p> <p>Providing a suitable level of supervision.</p> <p>Allocating work in accordance with the employee's level of training.</p> <p>Reporting defective equipment and ensuring that such equipment is taken out of use.</p> <p>Informing employees of their responsibilities.</p> <p>Encouraging employees to report defects and suggest improvements.</p> <p>Ensuring that correct work procedures are adhered to.</p> <p>Carrying out regular inspections of the workplace.</p> <p>Ensuring that accidents and near-misses are reported and assisting in any subsequent investigation.</p> <p>Providing induction training.</p> <p>Setting a good personal example.</p>
EMPLOYEES	<p>Working in accordance with Group procedures.</p> <p>Reporting accidents and near-misses.</p> <p>Reporting defective equipment and hazardous situations.</p> <p>Using the appropriate PPE and associated safety equipment provided.</p> <p>Avoiding horseplay which could result in injury.</p> <p>Complying with management requests and instructions.</p> <p>Not using defective equipment.</p> <p>Not misusing equipment.</p> <p>Not damaging equipment.</p> <p>Exercising reasonable care towards themselves and others.</p> <p>Not undertaking tasks that they are not trained for.</p>

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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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