



HEALTH & SAFETY POLICY

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HEALTH AND SAFETY POLICY

1. GEWS HEALTH AND SAFETY POLICY STATEMENT

GEWS Limited is one of Wales' leading drainage and waste disposal companies with a reliable and efficient fleet of over 60 vehicles. It is our policy to continue driving forward in the drainage industry, giving continued commitment to serving our customers with professional, fully trained operatives, together with the latest technology and equipment, whilst considering the health and safety of all of our employees and others likely to be affected by our operations and to continually improve our health and safety performance.

Specifically the directors of GEWS are committed to:

- Ensuring the occupational health and safety of our employees and other persons who may be affected by our activities,
- Complying with current health and safety legislation and codes of practice, applicable to the operations of the business, are complied with as the minimum;
- The prevention of accidents and ill health through the promotion of a safe and healthy working environment;
- The provision of appropriate safety training including induction training and plant training, with additional specific training where necessary;
- The development of health and safety objectives and targets against which health and safety performance and progress can be measured and reviewed;
- The provision of adequate financial and technical resources to fully implement this policy and provide for continual improvement
- The provision and maintenance of plant, equipment and systems of work which are, so far as is reasonably practicable, safe and without risks to health;
- The provision and maintenance of workplaces which are, so far as is reasonably practicable, safe and without risks to health;
- The provision of the appropriate first aid and emergency facilities at all locations within the business;

The Directors accept that health and safety performance is a key management responsibility but the successful implementation of the Policy relies on the co-operation of all employees. The company will consult and communicate with its employees at regular meetings. It is the duty of all employees to comply with this health and safety policy at all times, to cooperate with management in the implementation of all other health and safety policies and procedures and to use the health and safety facilities provided. This will be achieved through proactive implementation of its health and safety management system which complies with the requirements of ISO 45001:2018.

Management will review the continuing adequacy of this health & safety policy on a 12-monthly basis. The policy will be communicated to all persons working under the control of the organisation, including contractors and visitors, by induction training and displaying appropriately.

SIGNED: Gwil Thomas

Director of Compliance, Regulation, Health & Safety

DATE: 17 February 2025



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2. ORGANISATION FOR HEALTH AND SAFETY

The overall organisational structure for how the management of the Health and Safety Policy is operated is shown in the Health and Safety organogram attached.

- The person at Board level with overall responsibility for Health and Safety is the Managing Director.
- In order that the Managing Director is kept informed, the MD has appointed a Health and Safety Manager and will utilise external health and safety governance.

RESPONSIBILITIES FOR HEALTH AND SAFETY

Director of Compliance, Regulation, Health & Safety – Gwil Thomas

Main Responsibilities are to:

- 1) Establish the company health and safety policy for the prevention of injury, ill health, damage and wastage and ensure that subordinates are fully aware of their accountability for Safety, Health and Welfare;
- 2) Administer the policy, or appoint senior members of the staff to do so;
- 3) Be familiar with requirements of applicable health and safety legislation and codes of practice and ensure that appropriate organisation for safety is established at the workplace to monitor compliance with these standards.
- 4) Appoint a Health and Safety Manager and ensure that he/she is adequately trained in their duties and that they have sufficient knowledge of plant/equipment/machinery to evaluate all aspects for its safe operations;
- 5) Ensure that all levels of staff receive adequate and appropriate training;
- 6) Insist that sound working practice is regularly observed;
- 7) Make sure that in tendering and at planning stages allowance is made for adequate welfare facilities and equipment to avoid injury, damage and loss;
- 8) Institute appropriate reporting, investigation and costing of accidents, including injury, ill health, damage and loss;
- 9) Arrange for sufficient funds and facilities to meet the requirements of the policy;
- 10) Consult with the Health and Safety Manager to ensure effective flow of information regarding health, safety and welfare, accidents/dangerous occurrences, loss and damage.



HEALTH AND SAFETY MANAGER -

Duties of the Health and Safety Manager are to:

- 1) Oversee and co-ordinate health and safety requirements across the company – liaising with senior management, consultants, HSE, site/client representatives, etc as appropriate.
- 2) Arrange for or carry out health and safety inspections and audits of company premises and sites.
- 3) Keep himself informed of changes to legislation and update senior management and site managers on the requirements of new legislation.
- 4) Ensure risk assessments are carried out as necessary to address office, yard, stores and site requirements – including fire risk assessments, noise, hand-arm vibration, etc.
- 5) Recommend suitable protective equipment for activities where risk assessments identify such control measures.
- 6) Develop and review policies, procedures, forms, instructions, etc, in order to maintain the health and safety management system up to date and in line with current legislative requirements.
- 7) Ensure all accidents and incidents are correctly investigated, reported and recorded and that suitable and sufficient action is taken to prevent reoccurrence.
- 8) Ensure all accidents, cases of occupational ill-health and dangerous occurrences are reported in accordance with the Reporting of Injuries, Diseases and Dangerous Occurrence Regulations.
- 9) Monitor the near miss and hazard alert reporting system and carry out follow up investigations to any near misses which could have the potential to cause serious harm.
- 10) Arrange for all in house training on a regular basis and carry out toolbox talks on any issues that need to be addressed throughout the company.
- 11) Ensure all relevant documentation is kept up to date e.g. material safety data sheets and carry out COSHH assessments on all substances which are hazardous to health.
- 12) Carry out hygiene monitoring to ensure the company complies with current legislation and does not exceed legal limits e.g. noise, dust and vibration monitoring.

The Health and Safety Manager, whilst NOT responsible for implementation of the Safety Policy, has the authority to instruct any employee to cease work on any activity whilst he contacts management responsible for that activity if, in his opinion, the employee/or other employees are at serious risk of danger to the health and safety of themselves or other persons.



HEALTH AND SAFETY OFFICER -

Duties of the Health and Safety Officer are to:

Ensure that any health and safety or environmental related issue, near miss, incident, accident or non-conformity is appropriately recorded and investigated and to ensure that health and safety and environmental best practice is being carried out during daily works. Specifically the Health and Safety officer will:

- 1) Ensure that all accidents and incidents are correctly investigated, reported and recorded and that suitable and sufficient action is taken to prevent reoccurrence
- 2) Ensure all accidents, cases of occupational ill-health and dangerous occurrences are reported in accordance with the Reporting of Injuries, Diseases and Dangerous Occurrence Regulations
- 3) Monitor the near miss and hazard notification reporting mechanism and carry out follow up investigations to any near misses which could have the potential to cause serious harm
- 4) Undertaking disciplinary meetings with staff not adhering to company policies and practices
- 5) Undertaking site inspections to ensure that health and safety and environmental issues are being addressed
- 6) Ensure that all staff have their individual training files up to date
- 7) Check emergency arrangements

MANAGEMENT SYSTEMS MANAGER –

It is the responsibility of the management systems manager to ensure that all documents pertinent to the management system are controlled, authorised, up-to-date and available to relevant staff and to report to the Director to ensure the efficient running of the system. Specifically the role involves:

- 1) Amending and controlling documents pertinent to the management system and keeping the master list up to date (document amendment register)
- 2) Monitoring the objectives and targets and management programme and reporting progress
- 3) Ensuring that internal audits are planned and undertaken
- 4) Arranging the management review meeting and taking relevant minutes
- 5) Ensuring that monitoring data is being captured and reviewed
- 6) Ensuring that H&S and environmental checks are being undertaken



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- 7) Maintaining the non-conformity log and ensuring that non-conformities are being closed out
- 8) Ensuring training records are kept up to date
- 9) Liaise with relevant personnel for the planning and testing of emergency arrangements
- 10) Data analysis for review at management meetings – near misses, lost time due to ill health, accidents, incidents, near misses, environmental pollution incidents, customer complaints, non-conformities, PQQ's/tenders won, etc.
- 11) Maintaining the master list of forms and records and ensuring that all records pertinent to the management system are being maintained and are easily located
- 12) Maintaining the training matrix and training plan for the year

DIRECTORS -

Main Responsibilities are to:

- 1) Understand the company policy and ensure that those for whom they are responsible appreciate their accountability for safety, health and welfare.
- 2) Ensure that tenders are compiled with adequate prices to cover safe methods of working and appropriate welfare facilities.
- 3) Provide written instructions to establish working methods, to explain the sequence of operations, to outline potential hazards and indicate precautions to be adopted.
- 4) Ensure that once started, work is carried out as planned and that the requirements of risk assessments and legislation are observed on site;
- 5) Check that all registers and records are in order and that the statutory inspections are carried out in accordance with the Regulations;
- 6) In conjunction with the Health and Safety Manager/Health and Safety Officer and Head of Operations, investigate the cause of accidents and dangerous occurrences with a view to preventing a recurrence and report all such incidents on the appropriate form(s) and in the event of a serious accident or significant dangerous occurrence, or in the serving of a prohibition or improvement notice, the following are notified immediately:-
 - a. Managing Director
 - b. Health and Safety Officer
 - c. Health and Safety Manager
 - d. Head of Operations



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- 7) Ensure that any correspondence received from the HSE is forwarded to the Managing Director and the Safety Manager;
- 8) Take disciplinary action against any member of staff, in line with the company employment handbook, for failing to discharge satisfactorily the responsibilities allocated to him/her.
- 9) Organise sites so that work is carried out to the required standard with minimum risk to personnel, equipment and materials;
- 10) Know the broad details of applicable health and safety regulations and other requirements;
- 11) Consider at the tender stage the safe methods of work which should be used and incorporate sufficient funds to provide them;
- 12) Give supervisors precise instructions with regard to their responsibilities for correct working methods; see that they do not require or permit employees (particularly young people) to take unnecessary risks;
- 13) Check that all machinery and plant, including power and hand tools, are well maintained and in good condition;
- 14) Ensure that all hazardous materials or substances are properly marked and stored and that adequate precautions are taken when handling;
- 15) Ensure that suitable protective clothing is available where appropriate and that it is used;
- 16) Plan and maintain a tidy site;
- 17) Liaise with enforcing authorities and act promptly upon their recommendations;
- 18) Ensure that 'first aiders' or appointed persons and all items of first aid equipment as required by the Health and Safety (First Aid) Regulations are available and their location known to employees.

HEAD OF OPERATIONS -

Main responsibilities are to:

- 1) Manage and coordinate the day to day running of operations
- 2) Work alongside the Health and Safety Manager and Health and Safety Officer to address health and Safety related issues
- 3) To allocate Team Leaders when planning jobs in conjunction with the Operations Supervisor
- 4) To ensure that Team Leaders and operatives are equipped with appropriate health and safety documentation prior to work commencing i.e. the issue of gang packs.



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OPERATIONAL SUPERVISORS -

The role of the operational supervisors is to take responsibility for work delivered at an operational level and to ensure that health and safety, environmental and quality related issues are being addressed and any issues of concerns raised.

Specifically operational supervisors will be responsible for:

- 1) Arranging monthly supervisors meetings and taking relevant recorded minutes
- 2) Raising issues of concern and report back to the Directors
- 3) Closing out non-conformities raised (where possible)
- 4) Reviewing progress with objectives and targets and management programmes where relevant
- 5) Reviewing and identifying training requirements
- 6) Developing relevant toolbox talks
- 7) Reviewing induction training as required

TEAM LEADERS -

Main Responsibilities are to:

- 1) Be familiar with legislation applicable to the work on which their operatives are engaged and insist that the requirements of those Regulations are observed;
- 2) Prepare and regularly review written risk assessments for the work activities undertaken;
- 3) Ensure that the requirements of applicable legislation are observed on site (with particular regard to the findings of risk assessments);
- 4) Ensure that a safe system of work is established and maintained at the workplace;
- 5) Stop operatives from taking unnecessary risks;
- 6) Ensure that new employees, particularly young people, take the necessary health and safety precautions – as defined in risk assessments and company rules;
- 7) Discourage 'horseplay' and report to management those operatives who constantly display a lack of concern for their own well-being and that of others around them;
- 8) Report plant or equipment defects, and any other obvious health and safety hazards, to management so that appropriate corrective action can be taken;



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- 9) Set a good example in health and safety to operatives by wearing the designated protective clothing and equipment and observing health and safety rules.

OPERATIVES -

Main Responsibilities are to:

- 1) WORK SAFELY - which includes using the correct tools and equipment for the job; using safety equipment and protective clothing supplied (e.g. safety helmet, goggles, respirator, ear defenders, etc).
- 2) Keep tools and equipment in good condition;
- 3) Keep the workplace tidy;
- 4) Report defects in plant and equipment to the supervisor;
- 5) Develop a personal concern for safety - for themselves and for others, particularly newcomers and young people;
- 6) Avoid improvisation which entails taking unnecessary risks;
- 7) Warn new persons to the work area of known hazards;
- 8) Refrain from 'horseplay' and the abuse of welfare facilities;
- 9) Familiarise themselves with the content of risk assessments and to consult with supervisors regarding changes and improvements;
- 10) Suggest ways of eliminating hazards and improving safety performance;
- 11) Co-operate with the Health and Safety department in the fulfilment of its duties – including involvement in audits, accident investigations, completion of toolbox talks, etc.

OFFICE STAFF -

- 1) Work safely – which includes using the correct equipment for the job in a safe manner, applying safety procedures and techniques during the course of their duties (e.g. following manufacturers' instructions and recommendations when using office equipment and applying correct manual handling techniques when lifting, etc);
- 2) Maintain equipment in good condition;
- 3) Keep the office and workstation tidy and uncluttered;



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- 4) Report defects in equipment to the Finance Manager;
- 5) Follow emergency instructions relating to fire control and first aid;
- 6) Report all accidents, incidents and near-misses to the Health and Safety Officer or immediate manager;
- 7) Report personal cases of ill-health or health conditions requiring the use of prescription drugs;
- 8) Co-operate with management in the maintenance of a safe working environment – including involvement in safety inspections/audits, accident investigations, risk assessments, training, etc.

HEALTH AND SAFETY SUPPORT -

GEWS Ltd will use the services of external consultants and advisors as required to provide health and safety assistance to the Company, specifically to:

- a) Remind the Company of relevant new legislation; recommend working methods for compliance and assistance with dissemination of information and formalisation of new arrangements and procedures;
- b) Carry out requested inspections and independent monitoring of Company activities and report on the findings;
- c) Assist the Company in accident investigations, and to offer advice on measures to prevent re-occurrence;
- d) Undertake compliance audits as requested to ensure that the Company can demonstrate it is operating legally;
- e) Assist with maintaining an ISO 45001: 2018 compatible Health and Safety Management System, undertaking internal audits as requested.

HEALTH AND SAFETY COMMITTEE –

In order for participation of employees a Health and Safety Committee is to be established to provide a platform health and safety issues to be highlighted by staff and reported to management.

Specifically the Health and Safety Committee will:-

- a) Review accident investigation and subsequent actions
- b) Health and safety Inspections
- c) Changes in the workplace affecting health, safety and welfare of staff
- d) H&S training
- e) Emergency procedures

See organisation chart for the structure of the company



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3. HEALTH AND SAFETY ARRANGEMENTS

This section details the Health and Safety arrangements for the implementation of legal and other requirements.

Reference is made in this section to appropriate parts of the Integrated Management System (IMS) which contain more detailed information – e.g. procedures. The Management System shall be made available to relevant staff via the company share drive and the Director shall make the information available to employees as appropriate. This will be maintained by the Management Systems Manager.

The legislation referenced in this policy (and how it is appropriate to GEWS) is summarised in the register of health and safety legislation. This makes reference to the most up to date legislation and is maintained and kept up to date by the Health and Safety Manager.

Section	Details	Reference to management system
	Health and safety competence, training and awareness	Reference procedure GEWSMS-P07 – Competence, Training and Awareness
	Health and safety consultation and communication	Reference procedure GEWSMS-P16 – Participation of workers and contractors
	Health and safety emergencies	Reference procedure GEWSMS-P12 – Emergency preparedness and response and GEWSOP-18 – Fire response procedure
	Health and safety monitoring	Reference procedure GEWSMS-P11 Monitoring and Measurement
	Driving company vehicles	Reference procedure GEWSOP-35 – Vehicle safety
	Control of visitors	-
	Drugs and alcohol	Reference procedure GEWSOP-32 – Drugs and Alcohol
	Accident and incident reporting and investigation	Reference procedure GEWSMS-P14 – Accident and incident reporting and investigation and GEWSOP-34 – Near miss incident reporting
	Workplace health, safety and welfare	-
	First aid	Reference procedure GEWSOP-17 – First aid
	Hazardous substances	Reference procedure GEWSOP-16 – COSHH



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	Asbestos	Reference procedure GEWSOP-26 - Working with asbestos and lead
	Manual handling	Reference procedure GEWSOP-23 – Manual Handling
	Work at height	Reference procedure GEWSOP-15 – working at height
	Work equipment	Reference procedure GEWSOP-19 – Provision and use of work equipment
	Lifting equipment	Reference procedure GEWSOP-20 – Lifting equipment
	Hot work	-
	Abrasive wheels	-
	Electricity	Reference procedure GEWSOP-27 – working with electricity
	Demolition and excavations	Reference procedure GEWSOP-30 – excavations and earthworks
	Lone working	Reference procedure GEWSOP-33 – Lone working
	Display screen equipment	Reference procedure GEWSOP-31 – Working on display screen equipment
	Stress	-
	Noise and vibration	Reference procedure GEWSOP-24 – Noise at work
	Personal protective equipment	Reference procedure GEWSOP-22 – Personal Protective Equipment
	Confined spaces	Reference procedure GEWSOP-25 – Confined space entry
	Dangerous substances and explosive atmospheres	Reference procedure GEWSOP-28 - Storage and use of highly flammable liquids and gasses
	Working near services	-
	Health surveillance	-
	New and expectant mothers	-
	Young Persons	-
	Contractor competence	-
	Work in extreme conditions – sunlight, cold weather	Reference procedure GEWSOP-36 – working in extreme conditions



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	Use of mobile phones	-
	Smoking	-
	Risk assessment	Reference procedure GEWSMS-P14 – Hazard Identification and Risk management procedure

3.1 Health and Safety Competence, Training and Awareness

Legislation reference:

- *The Health and Safety at Work Act 1974*
- *The Management of Health and Safety at Work Regulations*

In line with the legislative duty, the company will provide employees with adequate information, instruction and training. All training will take place during working hours or, where this is not possible, the time taken for training will be regarded as an extension to the employee's time at work.

The company will establish competence at all levels of the business during recruitment and will carry out any additional or refresher training to address the work undertaken or planned. No one will be allowed to carry out any activity or operate any plant and equipment for which they have not been adequately trained nor have appropriate experience.

Regular reviews of training requirements will be carried out by senior management to ensure competence requirements are appropriate for the work planned and conditions expected.

In order to address the 'competence' requirements of the Management of Health and Safety at Work Regulations, the company has a Health and Safety Manager who is IOSH qualified and utilises external consultants who are appropriately qualified.

The Company aims to continuously assess the competency levels of all employees and associates through an analysis of training needs and by the use of personal records of achievement to monitor the progress of individuals through the training programme.

All new employees will receive induction training and will not be allowed to work without supervision until they can demonstrate competence. A formal induction training programme is in place.

Job-specific training/coaching is given to all employees before carrying out any unfamiliar tasks, or when existing job conditions change and may result in exposure to new or increased risk.

See procedure GEWSMS-P07 – Training and awareness.



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3.2 Health and Safety Consultation and Communication

Legislation reference:

- *The Health and Safety (Consultation with Employees) Regulations;*
- *The Health and Safety (Information for Employees) Regulations.*

In line with the legislation, the management shall ensure that employees are consulted on health and safety issues associated with the work undertaken and any changes to systems, procedures, equipment, working methods, legislation, etc.

The Company will encourage the active participation of all employees in promoting good health and safety practice. Company safety meetings will take place at appropriate intervals in order to review the effectiveness of the policy and procedures, all reports and any recommendations received on matters of Health, Safety and welfare. Such discussions are intended to improve the overall safety performance of the company.

Use will be made of all means of communication to ensure that health and safety issues are brought to the attention of all staff - notice boards, circulars, site meetings, "face to face" discussions, toolbox talks etc.

A Health and Safety Committee will meet regularly and attendees will include at least two employees from appropriate areas of the business. An agenda of appropriate items for discussion will be compiled and minutes of the meeting will be taken and circulated.

The Health and Safety Law 'What you need to know' poster will be displayed at appropriate locations in the office and on site.

See procedure GEWSMS-P16 – Participation of Workers and Contractors

3.3 Health and Safety Emergencies

Legislation Reference:

- *The Management of Health and Safety at Work Regulations.*
- *The Construction (Design and Management) Regulations*

Suitable and sufficient fire and other emergency arrangements shall be put in place at the company's office, yard and garage and on any GEWS Ltd construction sites and depots. The arrangements shall ensure that employees and others affected by the company's activities are effectively evacuated from the premises or site and the emergency services summoned urgently.

Emergency arrangements shall be effectively communicated to office personnel and site personnel by posting and by induction training. The arrangements shall be kept up to date as developments in the business or contract occur.



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The Health and Safety Manager is responsible for ensuring emergency arrangements are developed and in place and for reviewing and updating them, including the review and updating of the fire risk assessment. The Health and Safety Manager will be responsible for ensuring all firefighting equipment and fire notices are maintained and for the regular checking of these arrangements.

The fire alarm system will be tested at least once a week from a different point and every 6 months a fire drill will be arranged. Fire procedure notices will be displayed by all fire evacuation alarm points and appliances. Fire marshals will be identified at appropriate locations.

Employees must ensure that they take reasonable care of themselves and others at work in respect of harm caused by fire. This means thinking about their activities at work and ensuring that they do what they can to keep the risk of a fire starting to a minimum. For employees on client's site they must make themselves aware of the client's fire procedures and adhere to them.

See procedure GEWSMS-P12 – Emergency Preparedness and Response and GEWSOP-18 – Fire response procedure

3.4 Health and Safety Monitoring

Reference:

- *ISO 45001: 2018*

The company shall proactively monitor its health and safety performance in all areas by means of Key Performance Indicators (KPI's) and routine inspections and audits. In particular, compliance with legislative duties, company procedures and best practice shall be examined. Directors, Health and Safety Manager and Health and Safety Officer and Operators shall carry out regular inspections of their areas and activities and any corrective actions generated shall be addressed urgently. Records of all inspections and audits shall be retained.

The Health and Safety Manager/Management Systems Manager shall collate all health and safety monitoring data and shall present the information regularly to the Directors in order to promote and facilitate continual improvement in health and safety performance. KPI's shall be set and shall include proactive and reactive monitoring mechanisms – e.g. accidents, incidents, near misses, inspections, awareness, training, etc. in order to recommend corrective actions to drive improvements.

The use of external resources shall also be used to examine conditions on site and shall report to senior management on performance findings.

See procedure GEWSMS-P11 Monitoring and Measurement

3.5 Driving Company vehicles



Legislation reference:

- *Health and Safety at Work Act;*
- *Road Traffic Act;*
- *Road Transport (Working Time) (Amendment) Regulations*
- *Corporate Manslaughter and Corporate Homicide Act*

Only persons holding a current legal British driving licence for the vehicle involved will be allowed to drive on company business. The company shall maintain records of licences and shall review and update them on an annual basis. All driving convictions and penalties must be reported to the main office for records update. All vehicles used on company business must be tested (where necessary), well maintained and roadworthy. Drivers shall be responsible for ensuring that the vehicle used on company business is checked for roadworthiness before undertaking a journey – tyres, wipers, lights, washer levels, etc. All drivers are to complete daily checks to prior to starting work.

Consideration shall be given to journey times and distances to ensure that personnel are not driving excess hours or under conditions which could lead to accidents or breach legislation.

Only those who are trained to do so and hold the relevant licenses can drive vehicles such as tankers, tractors, telehandlers, excavators and HGV's.

A tracker system is in place to monitor drivers and ensure safety of employees, particularly those who are lone working.

Sufficient breaks must be included to prevent fatigue and allow for weather/congestion etc. staff should always drive within speed limits and according to the prevailing weather conditions. Before driving, staff should know the procedure to follow in the event of a breakdown.

See Procedure GEWSOP-35 – Vehicle safety

3.6 Control of Visitors

Legislation reference:

- *The Management of Health and Safety at Work Regulations*

The company acknowledges its responsibility to ensure the safety of persons entering or working on its premises and as such will control the movements of such persons via a visitor procedure.

Company premises

All visitors to the company's premises shall sign the visitors' book and shall be made aware of the company's health and safety arrangements for emergencies and any appropriate health and safety rules. No visitors should be left unaccompanied in the yard or maintenance areas. Appropriate PPE will be provided for visitors as required.

Construction sites



All visitors to GEWS Ltd's sites shall be inducted in the site emergency procedures and in the health and safety arrangements in place on the site. Records of these inductions shall be retained by the relevant Manager.

3.7 Drugs and Alcohol

Legislation Reference:

- *The Management of Health and Safety at Work Regulations*

To assist in the safe performance of our duties, GEWS Ltd operates a strict policy of no alcohol and no drugs in the workplace.

No alcohol or (non-prescriptive) drugs will be tolerated in the workplace. Anyone who presents themselves for work under, or apparently under the influence of alcohol or drugs will be refused entry to the workplace.

For their own safety and that of their workmates or any members of the public, any member of staff or the workforce believing that another member of the staff or workforce is under the influence of alcohol or drugs should report this immediately to the Head of Operations or Director. Drugs supplied under prescription may still affect safety performance and the employee's line manager must be informed of any such situation.

Cases will be considered individually, but the following will generally be regarded as gross misconduct:

- 1 The use, possession, distribution or sale of alcoholic beverages on company premises without prior consent of a director;
- 2 The possession, use, distribution or sale of illegal or non-prescription controlled drugs;
- 3 The misuse of prescription drugs on company premises;
- 4 Being unfit to perform duties through alcohol or drug use (an individual judged by management to be in this condition will be removed immediately from the premises).

To assist in the implementation of this policy, the company will make use of its rights set out in the Employee Handbook. Employees are reminded of their obligation to disclose personal health issues including drug or alcohol dependency.

The company shall make every effort to assist employees found to have an addiction by encouraging confidential reporting and providing relevant guidance and/or referral to professional assistance.

See procedure GEWSOP-32 – Drugs and Alcohol

3.8 Accident and Incident reporting and investigation



Legislation reference:

- *The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR)*

The company understands the importance of capturing accident and incident information as well as its duties under current legislation for the recording and reporting of accidents and incidents.

All accidents shall be recorded in the accident book and shall be reported to the HSE in accordance with the requirements of the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR).

All accidents and incidents shall be investigated by the relevant manager in conjunction with the Health and Safety Officer and the level of detail shall be in line with the severity of the incident and the potential for serious injury. In all cases the company shall strive to determine the root causes of accidents and incidents. It is company policy to investigate all accidents and incidents, to establish the immediate and underlying causes, and where reasonably practicable recommend measures to prevent reoccurrence

Recognising that near-misses can develop into more serious accidents, near miss reporting shall be used as a mechanism for capturing such incidents.

Any employee suspected to be suffering from a reportable work related disease should seek medical attention. Upon receipt of a medical certificate, the Health and Safety Officer will ensure the statutory form is completed and sent to the authorities. An investigation will be undertaken to establish the cause, and where reasonably practicable, recommend measures to prevent reoccurrence.

A record of all accidents shall be maintained, for analysis, as an indicator of performance. As a requirement of RIDDOR, records of reportable injuries, diseases and dangerous occurrences will be kept for at least three years.

See procedure GEWSMS-P14– Accident and incident reporting and investigation and GEWSOP-34 – Near miss reporting

3.9 Workplace Health, Safety and Welfare

Legislation reference:

- *the Workplace (Health, Safety and Welfare) Regulations;*

The Directors shall ensure that the office, yard and vehicle maintenance facilities are in line with the requirements of the Workplace (Health, Safety and Welfare) Regulations. Appropriate welfare facilities shall be provided ensuring appropriate facilities for drinks and food preparation, sanitary, washing, etc.



The facilities shall be maintained and kept tidy by the use of regular cleaning services. Adequate lighting, heating and ventilation shall be provided and walkways shall be suitable and clear of obstructions. Inspections of premises shall be carried out by the Health and Safety Officer to ensure that the facilities and work areas are kept safe. Regular maintenance of the premises shall be undertaken by the company's own operators or contractors.

Storage facilities and yard areas shall be tidied on a regular basis to ensure safe working conditions and access and egress. Parking shall be controlled in a manner to minimise the potential for injury to company personnel and other pedestrians.

All Tankers carry basic washing facilities. Any additional requirements will be identified during the site specific risk assessment.

The Health and Safety Officer will inspect all such facilities to ensure that they are all in good order and well maintained.

All employees will be encouraged to make pertinent suggestions as to the safe use of such facilities and will be required to keep them clean at all times. No materials are to be stored in the welfare facilities. Those who desire to smoke must do so only in the designated smoking areas outside.

3.10 First aid

Legislation reference:

- *Health and safety at Work Act*
- *The Health and Safety (First Aid) Regulations*
- *Health and safety (Safety Signs and Signals) Regulations*
- *Construction (Design & Management) Regulations*

The company shall assess the first aid requirements for the business and put in place appropriate facilities – including first aid boxes and first aiders. First aiders shall be appointed or other "Appointed Person(s)" wherever there is a need either because of legislation or the type of activity carried out; they shall receive adequate training from an approved organisation. First aiders will be identified at appropriate locations.

Directors shall ensure that adequate first aid cover and facilities are always available, are signposted and are properly maintained in all work places and company vehicles when necessary.

See procedure GEWSOP-17 – First aid



3.11 Hazardous substances

Legislation reference:

- *The Control of Substances Hazardous to Health Regulations (COSHH)*

In line with the requirements of the COSHH regulations, the company will carry out assessments of all hazardous materials used and record the findings accordingly. Information on the nature of the materials will be compiled and any emergency procedures for spoilage and storage established. Any new substances being bought into the company will be assessed before being put into use and GEWS Ltd shall ensure that a suitable and sufficient assessment of the risks associated with those substances are carried out.

All employees will be instructed in the requirements of the COSHH regulations and the nature of the materials being used and the control measures to be taken. COSHH assessments will be made available to all staff, and information, instruction and training in the operation of the assessments will be given. Contract specific COSHH assessments will be identified at contract review in conjunction with the Health and safety Manager.

The Health and Safety Manager shall maintain a database of material safety data sheets (MSDS) for materials used by the company. When placing orders for materials, consideration shall be given to the hazardous nature of the material and material safety data sheets requested from the supplier if not already on the database.

It is the responsibility of the relevant Team Leader/Operative to ensure that all work involving a hazardous product or process is carried out strictly in accordance with the assessment sheets and instructions. All materials that are identified as presenting a risk during use will, where possible are eliminated from being used. Where this is not possible safer alternative products will be sought. If there is no acceptable alternative to that material controls will be put into the assessments to minimize the usage and specify the PPE needed for the safe use of that substance.

See procedure GEWSOP-16 – COSHH.

3.12 Asbestos

Legislation reference:

- *The Control of Asbestos Regulations*

The company is aware of and understands the serious harm that can be caused by inhaling asbestos fibres.

GEWS Ltd does not carry out any asbestos removal services or any work on asbestos containing materials. If asbestos is known to be on site or is discovered on site, the encapsulation or removal will be carried out by a competent and authorised asbestos handling company.



Prior to any work commencing on an existing building, the company shall ensure that an asbestos survey has been carried out and that the relevant information has been communicated and is available to the site personnel.

All employees who are likely to come into contact with asbestos on site shall be given asbestos awareness training and shall be made aware of the company's policy on encapsulation or removal.

See procedure GEWSOP-26 – Working with asbestos and lead.

3.13 Manual Handling

Legislation reference:

- *The Manual Handling Operations Regulations*

As part of the normal GEWS activities it is understood that manual handling is likely to be required. However, it is GEWS Ltd's policy to avoid manual handling as far as reasonably practicable.

Where manual handling cannot be avoided, then the risk of injury shall be reduced as far as is reasonably practicable by the completion of a specific manual handling risk assessment. This involves examining the task, the individual involved, the load to be moved and the environment in which the handling is to be undertaken. Such assessments shall be carried out by competent persons and the results of the assessments documented and fully communicated to the individuals involved.

All activities carried out by operatives and staff shall be examined and the requirements for manual handling operations established. In order to provide a general control measure for manual handling activities, all site personnel shall be trained in the kinetic method of lifting and in general manual handling awareness. Refresher training shall be carried out annually where practical and relevant.

Manual handling assessments shall be suitably documented. The findings of all assessments and the control measures to be adopted shall be fully communicated to the respective employees via the information, instruction and training aspects of the businesses operations.

See procedure GEWSOP-23 – Manual handling

3.14 Work at height

Legislation reference:

- *The Work at Height Regulations*

As part of the normal work activities work at height may be encountered and the company shall ensure that suitable assessments are completed to address this hazard. The company shall avoid work at height, use work equipment or other measures to prevent falls from height, and where the risk of a fall cannot be



eliminated, use work equipment (or other measures) to minimise the distance and consequences of a fall, should one occur. Collective rather than individual measures shall be used in the first instance.

In particular, the company will ensure that: -

- all work at height is properly planned and organised;
- all work at height takes account of weather conditions that could endanger health and safety;
- those involved in work at height are trained and competent;
- the place where work at height is done is safe;
- equipment for work at height is appropriately inspected;
- the risks from fragile surfaces are properly controlled;
- the risks from falling objects are properly controlled;

The company shall carry out appropriate awareness training to ensure that operatives are fully conversant with the requirements of this legislation. Appropriate equipment shall be provided and inspections and checks shall be carried out in accordance with this legislation.

All controls for working at heights will be written into the method statement for the actual work being carried out and any site specific controls needed would be explained to workers prior to starting work.

See procedure GEWSOP-15 – working at height

3.15 Work Equipment

Legislation reference:

- *The Provision and Use of Work Equipment Regulations (PUWER);*

The company shall maintain a register of site work equipment and shall ensure that appropriate maintenance and condition checks are carried out to avoid danger from faulty or damaged equipment.

Site operatives shall inspect their plant, equipment and tools before use. Defective equipment shall be removed from service immediately, appropriately marked as defective, or plugs removed, to avoid another person using it and reported to the main office for repair.

The use of equipment, especially mechanical, or electrically powered, is restricted to those persons who have been assigned the task of using it, and have received the information, instruction and training necessary for its safe use.

Portable appliances shall be PAT tested in accordance with the HSE guidelines. Records of all inspections and checks shall be held by the appropriate manager or held centrally at the main office.

Hired equipment shall only be hired from reputable, approved companies and shall be supplied with maintenance/inspection documentation. Work equipment shall be selected to meet the conditions and risks presented and shall generally be CE marked and supplied to appropriate British Standards.



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Equipment shall be stored and handled in a manner which minimises the risk of damage and subsequent harm.

See procedure GEWSOP-19 – Provision and use of work equipment

3.16 Lifting Equipment

Legislation reference:

- *The Lifting Operations and Lifting Equipment Regulations (LOLER)*

Certain site activities will involve the use of lifting equipment and the completion of lifting operations. In these cases, lifting operations shall be planned and executed by competent persons in line with the requirements of the above legislation. Lifting plans shall be developed by those competent persons and shall be followed closely.

All plant, lifting equipment and accessories shall have a thorough examination carried out by a competent person in accordance with the requirements of the LOLER regulations and suitable records shall be maintained. All lifting equipment whether supplied by the Company, or the Client is to be clearly marked with the safe working load.

All lifting equipment and accessories shall be inspected by a competent person before use on a project or before any work commences. Any defects identified in any lifting equipment are to be reported to immediately, the equipment removed from use and clearly marked as defective.

Users of the equipment shall carry out daily visual checks to ensure they are safe to use. Any hired equipment shall only be used if an appropriate test certificate is provided.

No one shall use lifting equipment or carry out any lifting operations unless they are suitably trained to do so and an appropriate risk assessment has been carried out.

See procedure GEWSOP-20 – Lifting equipment

3.17 Hot Work

Legislation reference:

- *The Health and Safety at Work Act*

The company may carry out 'hot work' as part of its activities. Such work may be associated with welding or hot cutting activities. It is recognised that unsatisfactory control of hot work can lead to fires and catastrophic consequences.



All hot work being carried out will be carried out under a 'Permit to Work' system. The following minimum provisions should be written into this permit to work:

- An assessment of the surrounding areas to determine the presence of any combustible materials and these items removed or protected from sources of ignition before work starts
- Isolate any flammable liquid lines
- Have suitable fire control arrangements and firefighting equipment available
- Ensure work is supervised by a competent person
- Ensure that work finishes one hour before the end of shift and the area is checked for burning or smoldering materials before the site is closed
- Suitable PPE to be worn

3.18 Abrasive wheels

Legislation reference:

The Provision and Use of Work Equipment Regulations.

The company use pedestal and bench grinding machines and as such operatives are subjected to the dangers associated with such equipment. Also, operatives may use Stihl saws or equivalents on site and may be subjected to the dangers associated with the breaking of cutting wheels or contact with moving parts.

Generally, the condition of the equipment shall be addressed in the manner described in the section on work equipment within this policy but particular attention shall be given to the correct use of the cutting blade which, if misused can lead to breakage and specific danger.

Blades shall only be changed by persons who have been suitably trained and are competent to ensure the correct fittings and tensions have been applied. Also, it is the company's policy that no one shall use such a saw unless they have been trained in the safe use of the equipment and are knowledgeable in the limitations of the blade, the cutting speeds, lubrication, refuelling, etc.

3.19 Electricity

Legislation reference:

- *The Electricity at Work Regulations.*

The company shall ensure that all installations, equipment and activities associated with electrical works are carried out in accordance with the legislative requirements. The office and garage workshop electrical installation shall be maintained to the requirements of the regulations and regular inspections shall be carried out to ensure that the installation remains in good condition and that no overloading is carried out. No work shall be allowed on live equipment and no one shall be allowed to work on electrical equipment or installations who is not qualified as detailed within the Regulations.



Operatives will be briefed on how to recognise electrical wires, this could be; overhead power lines, electrical wiring in a workplace or cables buried under the ground. Signage to be used where there are live circuits which could pose a risk to those working on site and warn other employees where it is safe to work.

See procedure GEWSOP-27 – working with electricity

3.20 Demolition and excavations

Legislation reference:

- *The Construction (Design and Management) Regulations*

Demolition

All demolition, dismantling and structural alteration shall be carefully planned and shall only be carried out by competent employees. A detailed demolition plan shall be put in place and fully communicated to all concerned before any work is to commence. GEWS Ltd shall coordinate and manage health and safety issues during any demolition project.

Team Leaders shall ensure that workers fully understand, acknowledge and follow the safe systems of work installed. All GEWS operatives shall work safely and follow the safe systems of work at all times.

If sub-contractors are engaged on the demolition work, appropriate checks shall be made to ensure that they are competent to do so, and a written demolition plan shall be put in place by them and checked by a competent person before they commence work.

Excavations

The company recognises the dangers that come with excavations and all practicable steps shall be taken, where necessary, to prevent danger to any person to ensure any excavation does not collapse. All excavation works will be carried out in strict accordance with the method statement for this work and details of the methods and controls to be used will be explained to all involved in the excavation work prior to the work commencing.

The following controls would be the minimum expected to be written into the method statement:

Erect suitable barriers and signs to prevent unauthorised access by vehicles or pedestrians

- Materials or spoil should not be stored close to the sides of the excavations
- Do not go into unsupported excavations
- If excavating in unstable ground, shuttering will be used to prevent unplanned collapse of the trench walls
- Use locators to trace any underground services and mark the ground accordingly
- A competent person must inspect the excavation
 - At the start of each shift, before work begins
 - After any event likely to effect the strength or stability
 - After any accidental fall of rock, earth or other material
- Do not site petrol or diesel-engine equipment such as generators or compressors in or near the edge



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- of excavations
- Confined space requirements

Appropriate management of excavations shall be undertaken to ensure that no material from around an excavation can fall into it, and no person is buried or trapped if material does enter the excavation. Excavations shall be inspected by a competent person in accordance with the legislation at the start of every shift in which the work is to be carried out, after any event likely to have affected the strength or stability of the excavation, and after any material unintentionally falls or is dislodged (or every seven days if no work is being carried out and excavation is left open).

No work will commence in an excavation until the person who carried out the inspection is satisfied that the work can be carried out there safely. Appropriate records of inspections shall be maintained.

See procedure GEWSOP-30 – excavations and earthworks

3.21 Lone Working

Legislation Reference:

- *The Management of Health and Safety at Work Regulations*

On occasions it may be necessary for company personnel to work within company or client's premises on their own. In these circumstances, an assessment shall be carried out to ensure that the risk of injury is minimised and that any necessary emergency arrangements are still accessible. No one shall be requested to carry out work on their own if there is a possibility that they may be endangered by the conditions and specifically, no one shall carry out work on hazardous machinery, at height, in dangerous areas, on electricity, with hazardous substances, etc.

Many employees drive on company business (alone). The company shall ensure that the risks are minimised by the provision of well-maintained vehicles to avoid breakdowns and by regular communication/planning.

The risks faced by those working alone are best minimised by a thorough risk assessment and the matters to be addressed in the risk assessment will include –

- Can the work be carried out safely by one person working alone?
- Does the workplace present a special risk to lone workers?
- Are women or young workers especially at risk if they work alone?
- Is the person medically fit and suitable to work alone?
- Are there adequate security arrangements?
- Is any specialised training required?
- How will the lone worker be supervised and/or monitored?
- What happens if a person becomes ill, has an accident, or there is an emergency?

See procedure GEWSOP-33 – Lone working



3.22 Display Screen Equipment

Legislation Reference:

- *The Health and Safety (Display Screen Equipment) Regulations.*

The company recognises that habitual use of display screen equipment can lead to tiredness of the eyes, muscle/tendon problems, stress, fatigue, etc and will ensure that all workstations of 'users' of display screen equipment are appropriately assessed. 'Users' are defined as those members of staff who habitually use display screens as part of their normal work.

In line with the requirements of the legislation, free eye tests will be provided for 'users' who request them and where necessary spectacles will be purchased. The spectacles will be of the basic design and any 'user' requiring a different design can pay the difference.

See procedure GEWSOP-31 – Display Screen Equipment

3.23 Stress

Legislation Reference:

- *The Management of Health and Safety at Work Regulations;*

Senior Management are aware of the hidden dangers and ill-health associated with stress and shall monitor the performance and general condition of its workforce to ensure that no employee is put at risk as a result of unachievable deadlines, overwork, personal problems made worse by working conditions, poor working conditions, etc. Where appropriate, the company shall provide employees with time off or access to professional help to prevent and avoid ill-health associated with working conditions. Where an employee has suffered ill-health due to stress, every effort shall be made to provide an appropriate return to work and introduce changes to the working environment to address any stressful conditions.

After a stress risk assessment has been carried out, the effectiveness of measures taken to reduce stress must be reviewed on a regular basis. The company will consult with employees on all issues around the Stress Policy and any provision for training. Employees are encouraged to consult with their managers around issues relating to work related stress.

3.24 Noise and Vibration

Legislation Reference:

- *The Noise at Work Regulations;*
- *The Control of Vibration at Work Regulations.*



Noise

In line with the legislation, GEWS Ltd will ensure that all noisy activities are appropriately assessed and that every effort is made to reduce the noise levels at source. Where noise levels reach the action levels, then appropriate arrangements will be put in place to ensure that no employee, or others affected by the work activity, is subjected to injurious conditions. Ear defenders or other hearing protection will be made available on the site/workplace for any operations where it is not practicable to reduce the noise levels to a safe limit. Attenuation provided by the hearing protection shall not be excessive and shall only be sufficient to protect the user from harm without eliminating relevant background sounds.

Appropriate facilities shall be provided for the safe storage of the protective equipment and operatives shall ensure that the equipment is kept clean and in good condition, any defects are to be reported immediately.

All equipment purchased or hired shall have the noise levels identified so that an appropriate assessment can be made. Where it is not possible to evaluate the levels from provided data, job specific noise assessments shall be carried out by a competent person. Exposure times and limits shall be monitored and observed. GEWS will ensure that all plant provided is fitted with silencers, mufflers, doors, canopies etc. and that all equipment and noise reducing facilities, etc are used.

No operative shall be subjected to noise levels at or above the legal limits.

Vibration

Hand/arm vibration exposure when working for GEWS Ltd can arise from the use of hand held power tools. Risk assessments shall be carried out by a competent person when there is a risk of hand/arm vibration and the assessment shall ensure that the employee's exposure does not exceed the legal limit.

Equipment purchased or hired shall be provided with the vibration data allowing the competent person to make the assessment. Records of the assessments shall be retained and the requirements fully communicated to the user. No operative shall be subjected to vibration levels at or above the legal limits.

Operatives subjected to noise and vibration as part of their activities shall be given appropriate awareness training and shall be instructed in the correct use of the associated PPE. Operatives shall also be made aware of the signs of injury from the use of noisy and vibrating equipment.

See procedure GEWSOP-24 – Noise at work



3.25 Personal Protective Equipment

Legislation Reference:

- *The Personal Protective Equipment Regulations*

All PPE (including Respiratory Protective Equipment - RPE) provided by GEWS Ltd will be to the accepted standards, according to the work undertaken, shall be CE marked and shall comply with the requirements of the above regulations.

Assessments of PPE shall be carried out to ensure the appropriateness and suitability. Facilities shall be provided to employees to ensure that PPE is maintained and stored properly and instructions shall be given on how to use the PPE correctly.

Additional training will be provided to ensure employees are aware of the purpose of the PPE. It is the policy of GEWS Ltd that safety boots, and high-visibility work wear are worn at all times on site and hard hats and RPE where necessary; any employees complying with this policy will be subjected to the company's disciplinary procedure which may lead to dismissal. All contractors and their sub-contractors are required to adhere to this policy.

Adequate supplies of all necessary protective clothing or equipment are available for issue as required. When first issued to employees at the Company induction training, all employees will be given instruction in the use, maintenance and replacement arrangements and will be asked to sign a receipt for the issue of the items issued.

Any person in the workplace, who is observed not wearing protective clothing while carrying out a process which requires the use of protective clothing or equipment, will be informed of statutory or company policy requirements, and instructed not to continue working until protective clothing or equipment is obtained. This applies to any sub-contractor as well as direct employees.

All personal protective equipment will be maintained, serviced, cleaned and replaced where necessary. Facilities will be provided for the storage of PPE.

All Supervisory and Management staff will set a good example in the wearing protective clothing and other equipment where required.

No charge is made to employees for the issue of PPE, but if the employee wishes to purchase their own, e.g. safety boots, providing that they meet the required standard, the Company will reimburse the employee the cost that it would otherwise have incurred in supplying that item.

If any item of PPE required is missing, out of date, damaged or faulty then the Company will replace it on request.

A register of all PPE issued will be maintained and kept in the Company office.

See procedure GEWSOP-22 – Personal Protective Equipment



3.26 Confined Spaces

Legislation Reference:

- *Management of health and Safety at Work Regulations*
- *The Confined Spaces Regulations*

A “Confined space” is understood to be any place, including any chamber, tank, vat, silo, pit, trench, pipe, sewer, flue, well or other similar space in which, by virtue of its enclosed nature, there arises a reasonably foreseeable specified risk of:

- Serious injury from fire and explosion
- Loss of consciousness arising from an increase in body temperature
- Loss of consciousness or asphyxiation of any person at work arising from gas, fume, vapour or lack of oxygen.
- Drowning from an increase of liquid
- Asphyxiation from a free flowing solid

Therefore no person shall enter a confined space to carry out work for any purpose unless it is not reasonably practicable to achieve that purpose without such entry. Where it is not reasonably practicable to avoid entering the confined space then a safe system of work will be used, and a detailed risk assessment will be carried out. A permit shall be raised by the competent person ensuring that suitable planning has taken place. Work must be supervised by a competent person. All operatives will be competent to enter the confined space and have had the relevant training to enter. Emergency arrangements will also be in place before any work can commence.

See procedure GEWSOP-25 – Confined space entry

3.27 Dangerous substances and explosive atmospheres

Legislation reference:

- *The Dangerous Substances and Explosive Atmospheres Regulations.*

The company shall ensure that any substances falling under this legislation, e.g. LPG cylinders, are correctly stored and protected against damage. Appropriate precautions and facilities shall be installed to identify the conditions for use and storage associated with such substances and the necessary training shall be carried out. No materials will be allowed to be stored at the workplace unless they have a current instruction sheet from the suppliers and each member of staff is familiar with its contents.

Risk assessments will be undertaken for any work activities involving dangerous substances. The company will provide measures to eliminate or reduce risks as far as is reasonably practicable; provide equipment and procedures to deal with accidents and emergencies; provide information and training to employees and classify places where explosive atmospheres may occur into zones and mark the zones where necessary.



See procedure GEWSOP-28 - Storage and use of highly flammable liquids and gasses

3.28 Working near services

Legislation reference:

- *Health and Safety at Work Act*

Accidental contact with live overhead power lines or underground cables kills people and causes many serious injuries every year.

Work will be planned and managed so that risks from accidental contact or close proximity to electric overhead power lines or underground services are adequately controlled.

The following will be adhered to when working near services:

Underground services

- Service plans to be used where available to locate and underground services in areas where digging is to take place. Where plans are not available power location equipment should be used. Or the GEWS Hydro excavator which will not damage services.
- Wherever possible excavations will be made away from existing services.
- Use the locator to accurately trace the line of any pipe or cable and hand dug trial holes to verify
- Erect suitable signage and barriers to control access
- If unidentified services are found, stop work until further checks can be made to confirm it is safe to do so
- Hand dig trial holes to confirm the position of pipes or cables. This is particularly important in the case of plastic pipes that cannot be detected using normal detection equipment
- Treat all pipes and cables as live unless it is known otherwise
- Use spades or shovels rather than picks or forks, preferably non conducting.
- Do not use hand held power tools within 0.5m of the marked position of an electricity cable
- Do not machine dig within 0.5m of a gas pipe.

Overhead Services

- Do not bring plant or equipment closer than 15 meters to overhead lines suspended from steel towers or 9 meters from lines on wooden poles
- Where work is required closer than this the power supplier should be consulted to make the line dead or to insulate
- Erect 'goal post' barriers suitably marked to warn of the approach from either side
- Ensure the area is well lit
- Do not store materials within the barriers
- Where the area is fenced off ensure that the fence is suitably earthed
- Erect warning signage



Working over water

Where there is a risk of falling into the water and drowning, it is essential to ensure that a system is in place that includes prevention of this occurring, provision and wearing of buoyancy equipment and rescue arrangements.

These provisions would be written into the method statement for the particular site and would be fully explained to workers at the site induction training.

Risk assessments would be carried out on any work involving working over water to identify any hazards, assess the level of risk and identify measures necessary to prevent or adequately control the risk. Buoyancy equipment provision would only be needed where other suitable controls would be unavailable.

Information, instruction and training will be provided to all operatives and supervised for compliance.

3.29 Health Surveillance

Legislation reference:

- *The Management of Health and Safety at Work Regulations.*

In order to ensure that new and existing employees are not subjected to working conditions which could exacerbate any existing health problems, or place them in an environment where they could develop a health problem due to existing limitations, the company shall undertake health surveillance checks to regularly monitor employees' health conditions. Appropriate preventive action shall be taken following a review of the information presented by the employee, e.g., limitations or restrictions in work activities.

Ongoing evaluation of sickness absence shall be carried out to monitor any possible employee health problems associated with working conditions and managers shall observe employees for any health issues associated with the work undertaken, e.g. skin disorders, physical conditions, etc.

3.30 New and expectant mothers

Legislation reference:

- *The Management of Health and Safety at Work Regulations.*

The company shall ensure that a specific risk assessment is carried out for all pregnant employees as soon as the employee has made her condition known to the company.

Any changes to working conditions, environment or hours deemed necessary as a result of the assessment shall be introduced by the immediate manager. If the foreseeable risks cannot be reduced sufficiently by these changes, then it may be necessary to find suitable alternative work within the company. If a safe working environment (through either alteration to existing tasks or alternative tasks) cannot be offered to the pregnant worker, or new mother, she will be entitled to paid leave to protect herself and her child.



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3.31 Young Persons

Legislation reference:

- *The Management of Health and Safety at Work Regulations.*

Before a young person, such as an apprentice, starts work, the Company will undertake a risk assessment specifically in relation to the risks to health and safety of young people, taking into account the inexperience, immaturity and lack of risk awareness of young people.

It is Company policy to formally notify the parents of the young person, to inform them of the exact nature of the work activities to be carried out and the hazards and risks the young person may encounter.

3.32 Contractor Competence

Legislation reference:

- *The Construction (Design and Management) Regulations;*

The company understands that the health and safety performance of its contractors must be adequately reviewed and monitored in order that its own workforce but also that of the contractor's is adequately protected from harm resulting from unsafe practices. Accordingly, GEWS Ltd shall determine the competence of contractors working under its control by the use of evaluation questionnaires and ongoing inspections.

As part of the evaluation, evidence will be obtained to confirm appropriate competence in terms of skills and health and safety awareness – CSCS cards will be checked and other relevant competence cards/certificates examined.

As a measure of the contractors' understanding and knowledge of health and safety requirements, references shall be followed up and the contract safety documentation prepared by the contractor (risk assessments, method statements, etc) shall be reviewed for adequacy, accuracy and completeness.

In addition, the requirements of contractor competence, as detailed in the ACOP to the CDM Regulations shall be referenced.



3.33 Work in extreme conditions

Legislation reference:

- *the Construction (Design and Management) Regulations;*
- *the Workplace (Health, Safety and Welfare) Regulations*

Sunlight

GEWS Ltd recognises the health hazards associated with exposure to UV from sunlight and understands that excessive sunlight can lead to sunburn and blisters in the short term and to an increased rate of ageing and possible skin cancer in the long term. It is understood that working in the heat of the day can also cause dehydration, lead to an increase in body temperature and possible cause sunstroke.

The company will ensure that all personnel working in these conditions are made aware of the hazards and will provide sunscreen and appropriate clothing to address the hazards. Plenty of drinking water will be made available and an appropriate level of breaks or alternative work out of the sun will be arranged.

Cold weather

GEWS Ltd understands that cold weather may bring on conditions such as hypothermia, frostbite or immersion foot. In addition, it is recognised that cold hands can lead to mistakes and cause accidents.

The company will ensure that appropriate outdoor clothing is available and an appropriate number of breaks in suitably heated facilities are provided to allow workers to warm-up.

See procedure GEWSOP-36 – working in extreme conditions

3.34 Use of mobile phones

Legislation reference:

- *The Management of Health and Safety at Work Regulations.*

As a responsible employer, GEWS Ltd is aware that it is illegal to use a hand-held mobile phone whilst driving, stopped at traffic lights, in a traffic jam or in any other hold-up. Hand-held phones may only be carried in company vehicles provided that they are switched off and not referred to when under the conditions above.

Hands-free mobile phone set-ups may be used when driving company vehicles. However, drivers should refrain from using them as far as possible and must retain full control of their vehicles at all times. Any calls to and from a hands-free mobile phone should be kept as short as possible.

It is the company's policy to discipline employees using hand-held mobile phones whilst driving.



3.35 Smoking at Work

Legislation reference:

- *The Workplace (Health, Safety and Welfare) Regulations.*

It is recognised that smoking can seriously damage a person's health and can also be a source of ignition leading to a fire. Smoking is not permitted within the company premises other than in special designated areas, or in company vehicles which are shared. No-smoking areas will also be established on construction sites by the relevant site manager – details will be available in the site health and safety documentation.

Employees and sub-contractors must respect no-smoking rules both on company premises and on site. Breaches of no-smoking rules – particularly when a significant fire hazard is presented – will be treated as serious misconduct.

A company vehicle must be smoke-free if it is used for work by more than one person, even if the persons who use the vehicle do so at different times, on different days or only intermittently. If an employee uses their own car or a company car for business purposes, the ban does not apply unless it is being used for work by more than one person, either as a driver or passenger. Drivers who use their own cars on company business shall prohibit smoking if passengers are carried during that business.

3.36 Risk Assessment

Legislation reference:

- *The Management of Health and Safety at Work Regulations*
- *ISO 45001: 2018*

Senior management understand that successful health and safety management relies on the effective control of hazards and risks. Therefore, GEWS Ltd shall establish, implement and maintain procedures for the ongoing hazard identification, risk assessment, and determination of necessary controls.

The procedures for hazard identification and risk assessment shall take into account:

- Routine and non – routine activities
- Activities of all persons having access to the workplace (including contractors and visitors)
- Human behaviour, capabilities and other human factors
- Identified hazards originating outside the workplace capable of adversely affecting the health and safety of persons under the control of the organisation within the workplace
- Hazards created in the vicinity of the workplace by work-related activities under the control of the organization
- Infrastructure, equipment and materials at the workplace, whether provided by the organisation or others
- Changes or proposed changes in the organisation, its activities, or materials
- Modifications to the OH&S management system, including temporary changes, and their impacts on operations, processes, and activities



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- Any applicable legal obligations relating to risk assessment and implementation of necessary controls
- The design of work areas, processes, installations, machinery/equipment, operating procedures and work organization, including their adaptation to human capabilities

All activities carried out by the company, including those at its head office, will be assessed in line with the requirements of current legislation and OHSAS 18001:2007. The company will also ensure that sub-contracted activities have been appropriately assessed and will confirm the adequacy prior to work commencing.

See procedure GEWSMS-P14 – Hazard Identification and Risk management procedure

4. REVIEW OF POLICY

This Policy will be reviewed annually to ensure it remains relevant to the organisation. All legislation referenced is detailed in the health and safety register of legislation, which is regularly maintained to contain any new amendments to health and safety legislation. If any major changes to legislation take place the policy will be amended accordingly.

5. EQUAL OPPORTUNITIES

GEWS Ltd exercises an equal opportunities policy in all aspects of employment, from vacancy advertising, selection, recruitment, and training to conditions of service, pay and reasons for termination of employment.