



HEALTH & SAFETY POLICY

ELIMINATING WASTE BY TRANSFORMING IT INTO A VALUABLE RESOURCE

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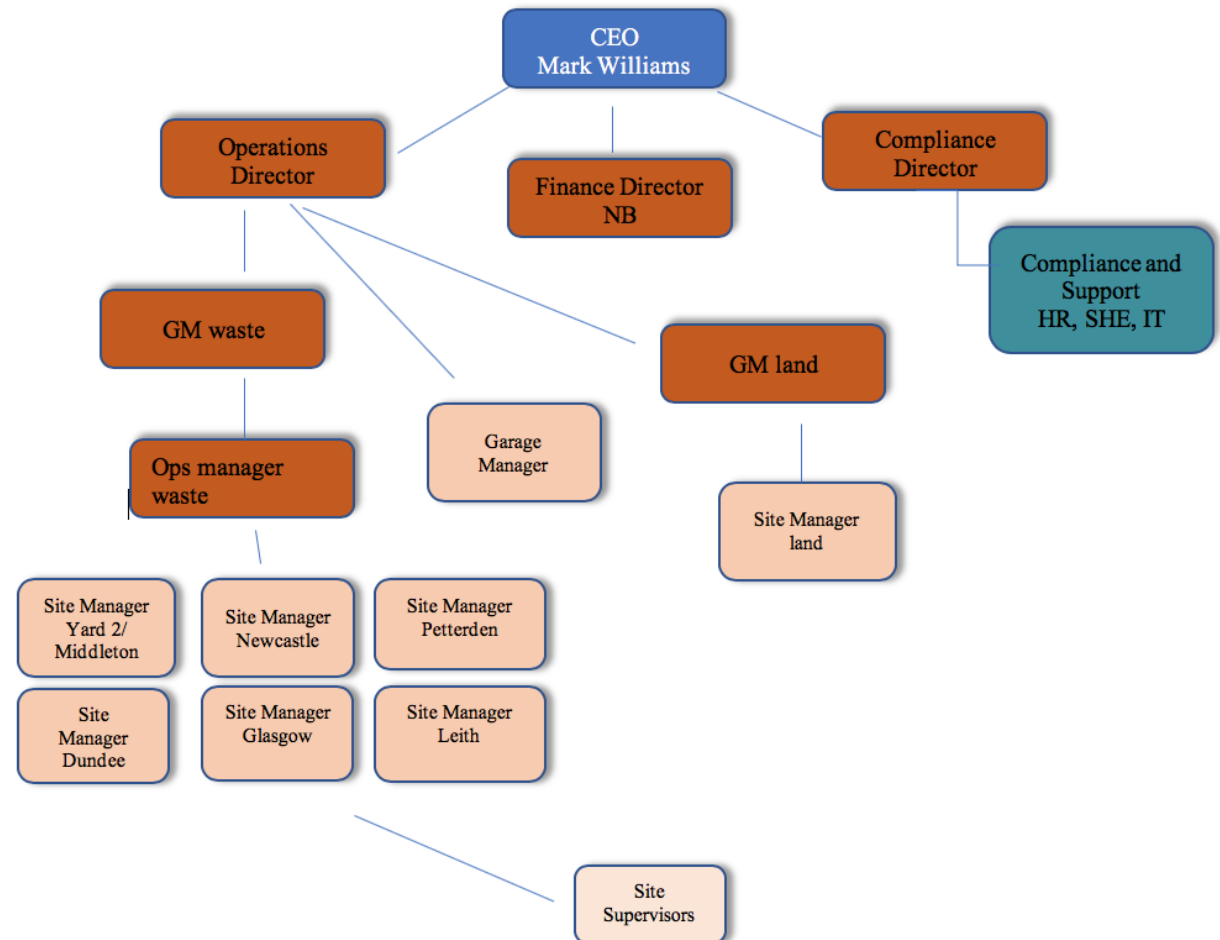
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STATEMENT OF INTENT

The Company's Health and Safety Policy Statement, signed and dated by the CEO, is displayed within all Company Premises. A copy of the statement can be obtained from the SHE Manager.

This will be reviewed annually by the organisation and revised as appropriate.

Organson and Responsibilities



ORGANISATION AND RESPONSIBILITIES

Company Organisation

The success of the Company in maintaining a high standard lies in its ability to maintain a flexible organisation to deal with matters of concern relating to the health, safety and welfare of its employees howsoever arising.

To ensure commitment and provision of safe working conditions the Company outlines specific responsibilities of management, supervision and employees for the maintenance and improvement of health and safety conditions within the Company.

All employees have dedicated responsibilities administering and implementing the Company SHE Policy.

In view of the overall importance of SHE and safe working, anyone has the right and duty to stop an unsafe practice of any process, method of working, or machine, which they consider to be unsafe until such time the fault is corrected.

Any such observation should be reported immediately to the C.E.O.

ORGANISATION AND RESPONSIBILITIES

C.E.O.

The C.E.O. has responsibilities to ensure their staff are fully aware of their duty regarding Safety, Health and Environment (SHE). The C.E.O. shall have full knowledge and understanding of the Company's SHE policy and in particular the requirements of the Health and Safety at Work etc. Act 1974 and other such regulations and codes of practice as from time to time there under which may be applicable to their duties within the Company.

In addition, each Director shall:

- Ensure all staff are fully aware of their duty regarding SHE.
 - Ensure any product modifications or new substance introduced to meet client specification, which has any SHE notifications are advised to the Compliance Department.
 - Ensure product designs comply with its relevant EC and UK Legislation and Standards.
 - Ensure where employees are carrying out work, they carry out this work in a safe manner without risks to SHE.
 - Ensure instances of non-compliance are immediately dealt with and where required disciplinary action taken.
 - Take responsibility for SHE practices under their control and observe at all times the Company's SHE procedures.
 - Undertake regular SHE Inspections.
 - Demonstrate, by their conduct, a pro-active approach to SHE issues to ensure a positive culture is maintained.
- The SHE Policy is prepared, implemented, monitored and periodically appraised for its effectiveness with review to ensure that any necessary changes are made.
 - Review and evaluate the Company's SHE performance for the previous year and ensure a report is produced that shows the extent of successful risk control, areas where risk controls can be improved, and resources required for the coming year.
 - Safe systems of work are maintained and adhered to by staff.
 - All necessary steps are taken to ensure the Health, Safety and Welfare of all employees.
 - All employees are competent to carry out their work and are fully aware of all hazards.
 - Any operation or system of work where there is a serious risk of injury to employees is stopped until the risk is removed.
 - The Company complies with safety legislation and all employees are briefed and trained for the tasks to be completed.
 - Have regular meetings with employees to enable active participation, on-going review of performance and receive feedback on SHE matters.

ORGANISATION AND RESPONSIBILITIES

Health and Safety Advisors

In recognition of the importance of the Health and Safety of employees, customers and the general public to the conduct of its business, The Company has appointed a Safety Health and Environmental (SHE) manager to advise on Health and Safety matters. This appointment in no way absolves the management and employees of their individual and collective responsibilities to safeguard the Health and Safety of themselves and their colleagues.

NWH group will appoint external auditors to assist with the group HSMS reporting any matters requiring attention to the SHE Manager.

Safety THROUGHOUT THE COMPANY is
every employee's responsibility.

ORGANISATION AND RESPONSIBILITIES

Managers/Supervisors

The Site/depot Managers are responsible for ensuring all contractors working in and around our premises are briefed on our safety rules and are supervised to ensure they work in an approved and safe manner, and that any new hazards introduced into the workplace are adequately controlled.

Contractors working on company premises are assessed (see contractors questionnaire) to ensure that they have suitable and adequate Health and Safety policies and arrangements in place to provide safe working practices and control of all significant hazards that may be introduced by their work.

Managers/Supervisors bear additional responsibilities for the Health and Safety of people and places over which they have any degree of control. The more senior the appointment, the more onerous the responsibility. The level of that responsibility is directly linked to the level of control, and whilst duties can be devolved to others to carry out, the responsibility for ensuring that those duties are carried out by competent staff with adequate resources remains with the Compliance Director.

Managers/Supervisors responsibilities cover the maintenance of safety records; reporting of accidents, providing accident statistics; keeping updated on changing safety legislation, and reporting to the Compliance Director. The Managers/Supervisors and/or the Compliance Director, with a view to the prevention of future occurrences, will carry out full investigation of accidents.

Managers/Supervisors are responsible for ensuring the company's obligations in respect of assessment, control and monitoring of the workplace, work equipment, manual handling Compliance, personal protective equipment, first aid and fire safety are met which includes:

- All employees are fully conversant with the Company SHE Policy.
- Adequate supervision is always available particularly where young or inexperienced personnel are concerned.
- All employees under their supervision are adequately trained and fully aware of all hazards within their working area.
- All employees under their supervision know what to do in case of fire and the evacuation process.
- All new employees undertake an induction and fully understand details outlined in induction training documents, and that signed papers are kept for reference.
- They will always co-operate fully with the Compliance Department to ensure that requirements of the Company SHE Policy are being met.
- All employees under their supervision wear and use the correct personal protective equipment
- Accident report forms for all accidents within their process are completed and processed accordingly with suitable measures implemented to prevent recurrence following investigation.

ORGANISATION AND RESPONSIBILITIES

Managers/Supervisors Cont'd

- All guards and safety devices are fitted properly, inspected and maintained, and those employees under their supervision are aware and understand the need for such guards and safety devices.
- They or a representative shall attend the Monthly SHEFQ Meetings and are copied with the minutes of that meeting.
- Good housekeeping is always maintained within work sections under their control.
- Adequate time is given to employees under their supervision for training and risk assessment in SHE matters.
- Risk Assessments are undertaken and maintained within their process.
- Undertake regular SHE inspections.
- Demonstrate, by their conduct, a pro-active approach to SHE issues to ensure a positive culture is maintained.
- Having available on view or easy access, risk assessments applicable to their work area and process.

Employees

All employees have duties and responsibilities under the Health and Safety at Work etc. Act 1974 and it is the duty of every employee to:

- Co-operate with the Company on all safety matters, making themselves familiar with the company SHE Policy and conforming to all safety rules enabling the Company to fulfil its duties.
- Not to act recklessly or interfere with anything provided in the interests of health and safety.
- Report all hazards, accidents and near miss incidents.
- Always follow risk assessments and safe systems of work and ensure correct use of appropriate guards and safety devices.
- Make recommendations to continually improve Health and Safety in the Company to their Manager.
- Ensure their working practices do not endanger themselves or their fellow workers.
- Wear personnel protective equipment in line with company and/or site rules and as identified by risk assessments.

ORGANISATION AND RESPONSIBILITIES

Compliance Department

The Compliance Department will obtain and provide advice and assistance in order to manage effectively the various risks associated with the organisation's Compliance. They will:

- Report to the Manager responsible for Health and Safety.
- Advise on the Company SHE programmes.
- Regularly inspect the Company premises and sites to ensure that this programme is being complied with and make recommendations concerning SHE matters.
- Review and interpret new safety and environmental legislation for the Company and advise on its implementation.
- Recommend any necessary safety rules considering new legislation.
- Advise and assist when required in safety training of new and existing employees.
- Ensure that all significant accidents or high potential near miss situations are investigated and correctly documented.
- Maintain contact and liaison with official and professional bodies and other information and advisory services including but not limited to:
 - Health and Safety Executive
 - Scottish Environment Protection Agency
 - Local Authorities
 - Site Contractors
 - Institute of Occupational Safety & Health
- In consultation with the team concerned inspect new machinery and unusual processes for potential hazards.
- Shall ensure that all firefighting equipment is regularly inspected and serviced and liaison with the Fire Rescue Service is maintained.
- Review accident records and statistics.
- Liaise with employees to ensure the Company complies with all site SHE requirements.
- Audit, monitor and communicate risk assessments, to ensure a best practice safe working environment exists.
- To perform site visits and safety inspections on an "ad hoc" and unannounced basis to ensure safety standards are being upheld.

GENERAL RULES & PROCEDURES FOR ALL EMPLOYEES

Employees - Duties

All employees have a responsibility to do everything they can to prevent injury to themselves, their fellow employees and others affected by their actions or omissions at work. They are expected to co-operate with management and to follow company procedures to report any incidents that have or may have led to injury or damage. All employees should ensure that they use any equipment provided in accordance with the training and instruction that they have received, inform their supervisor about any serious or imminent danger, and report any shortcomings that they see in the protection arrangements. If the Departmental Supervisor or Manager is not available, an employee may stop work and immediately proceed to a place of safety in the event of being exposed to serious, imminent and unavoidable danger. Any employee who is faced with such a conflict between the demands of safety and his or her job should raise the matter as soon as possible with the supervisor after the danger has ceased or has been dealt with.

“Disciplinary action will be taken against any employee who is found to continuously fail to adhere to Health and Safety policies and procedures as laid out by the company’s HSMS.”

Reporting Accidents

- a. In the event of an accident causing injury, you must ensure that the injured person is being cared for and send immediately for a First Aider. **DO NOT MOVE THE INJURED PERSON** unless they are in further danger.
- b. Report the full details to the Departmental Managers/Supervisors who will record the incident in the accident book, investigate the incident and send to The Compliance Department to log. Any incidents deemed RIDDOR reportable will be reported by the Compliance Dept.
- c. Any ‘Near Miss’ incident that occurs should also be reported to your immediate supervisor who will be responsible for making a report to the Compliance Department.
- d. The Departmental Managers/Supervisors and/or the Compliance Department. Will formulate a report and will ensure that the necessary action is taken to prevent recurrence and will investigate all accidents.
- e. To keep the Compliance Department apprised of any requirements required to be reported under RIDDOR.

GENERAL RULES & PROCEDURES FOR ALL EMPLOYEES

First Aiders Responsibilities

The appointed person(s) for The NWH Group, as defined under the Health and Safety (First Aid) Regulations 1981 will;

- a. Ensure that first aid facilities and equipment are always readily available.
- b. Ensure that contents of first aid box are replenished when necessary or at regular intervals to comply with current legislation.
- c. Render first aid in accordance with their training.
- d. Ensure that all accidents are recorded in the accident book and forwarded to the Compliance department.

Security

All Key Holders will be responsible for ensuring that all windows and doors in their immediate working area are properly secured against possible unauthorised entry before they leave the premises at the end of the working day.

Working Areas (Company Premises)

All Staff have the responsibility to ensure the following:

- a. That relevant Safe Systems of Work (SSoW) are followed and utilised where required.
- b. That electrical cables or similar items are not extended over passageways, doorways etc. Floors are to be kept clear of equipment, rubbish etc. Fuels/Oils and other substances are to be cleared up immediately after spilling. Fuel must not be stored other than in appropriate containers.

A HIGH standard of housekeeping will be maintained at all times.

Personal Property/Equipment

No member of staff may use their personal tools/equipment or appliances on NWH premises or on Company business without the approval of the Compliance Department. and or the Departmental Manager/Supervisor.

GENERAL RULES & PROCEDURES FOR ALL EMPLOYEES

Vehicles

- Vehicles may only be parked in specifically designated areas and must not be left parked so as to cause obstruction to emergency ways, through routes or main service emergency access points. Only authorised staff are permitted to drive company vehicles.
- All vehicles are to be secured when left unattended to prevent unauthorised access and possible theft of the vehicle/equipment (see Company Vehicle Policy).

Protective Equipment

It is company policy to provide personal protective equipment as referred to within the relevant Risk Assessments, COSHH Assessments and Safe Systems of Work, and other aids to ensure the Health and Safety of employees. PPE must be used for the purposes for which they are provided (see associated policies).

Equipment/Plant

Every member of staff has a duty to bring to the notice of their Departmental Manager/Supervisor or the Compliance Department items of equipment or plant, which may in their opinion be considered a risk to health and safety.

Electrical Equipment

Electrical equipment is normally safe, provided it is properly installed and regularly inspected.

Remember that water and liquids are conductors of electricity and their association with faults caused by, for example, damaged cables, flexes, plugs and sockets. The overloading of circuits and fuses, etc. would make the shock more severe. Therefore, you should:

1. NEVER touch electrical equipment with wet hands; or move any portable electrical equipment without disconnecting it from the mains or make electrical repairs or do other electrical work unless you are an authorised person.
2. KEEP electrical supply cables and flexes away from wet areas or from where they will be damaged by being walked over or knocked when moving equipment about.
3. ALWAYS switch off all equipment when not required, unless continuous operation is necessary; disconnect electrical equipment at night by removing the plug from the socket, again unless continuous operation is necessary and/or instructed otherwise; report defective equipment to your Contracts Manager/Supervisor.

GENERAL RULES & PROCEDURES FOR ALL EMPLOYEES

Health & Safety Grievance Procedure

This procedure relates only to Occupational Health and Safety (OH&S) problems, disputes or grievances. In the event of the above, employees should either orally or in writing refer the matter to their Departmental Manager/Supervisor.

If the employees are dissatisfied with the outcome or in the event of there being a danger of death, serious imminent danger or health risk, employees may stop work and immediately leave the workplace and proceed to a place of safety. The matter should be reported as soon as possible to the Compliance Department who will investigate and determine what action should be taken.

After the investigation, the employee will be informed that either:

- a. The Company has so far as reasonably practicably eliminated the danger and employees must resume normal working, or
- b. The Company does not consider the matter constitutes a grave risk to Health or Safety, and employees must resume normal working, or
- c. The Company will undertake further investigation and may, if necessary, obtain expert opinion. Employees will then be suspended on full pay or be transferred to alternative work whilst the investigation takes place.

Refusal to resume normal working when instructed will be a breach of company discipline policy and the matter will then be dealt with under the company's normal disciplinary procedure.

Disciplinary Action

Any member of staff, who contravenes the provisions of The NWH Group Safety Policy and Procedures, whether (or not) by doing so they place the Health and Safety of themselves or others at risk, will be disciplined and if appropriate, dismissed.

GENERAL ARRANGEMENTS FOR HEALTH & SAFETY

Company

The Company has the responsibility to provide direction and to promote responsible attitudes towards Health and Safety and to organise the company so that Compliance are carried out to a satisfactory standard of safety, thereby minimising the risk to persons, equipment and materials. In doing so they will:

- Ensure strict implementation of the Health & Safety Policy.
- Ensure all staff for which they are responsible are aware of the Health and Safety Policy.
- Ensure that each new employee is given induction training; including the precaution procedures appropriate to their specific jobs (all new members of staff will be shown the location of first aid boxes, fire exits, fire-fighting equipment and emergency procedures).
- Ensure that all staff are made aware of any procedures in place if they face any serious or imminent danger; and the name of the competent person(s) designated to implement those procedures.
- Ensure that any temporary employee, before he or she commences work, shall be supplied with comprehensible information about any special occupational qualifications or skills required in order that the work can be carried out safely.
- Keep up to date with Health and Safety matters applicable to the Compliance of the company.
- Investigate all accidents with a view to prevention.
- Ensure good housekeeping standards are applied. This includes all company vehicles.

- Ensure that appropriate valid risk assessments are carried out for the company.
- Carry out regular safety checks and audits.
- Review periodically all new and existing equipment with reference to mechanical and operational safety and the location of all equipment bearing in mind the requirements of the workplace and the use of work equipment regulations.

Particular regard must also be paid to:

- Plant machinery, equipment, and methods of working to ensure they are safe and do not endanger Health.
- Providing safe arrangements for the handling, storage and movement of materials, equipment and substances hazardous to Health.
- Supplying sufficient Information, Instructions, Training and Supervision to enable employees to avoid hazards and contribute positively to their own Health and Safety at work.
- Inspecting equipment such as lighting, passageways, fire alarms, fire escapes, fire extinguishers, first aid facilities and work practices on a regular basis to ensure their efficiency and maintenance.

GENERAL ARRANGEMENTS FOR HEALTH & SAFETY

Health & Safety Management System (HSMS)

The Company operates a documented HSMS. The system consists of monthly, prioritised actions for Managers/Supervisors to complete and implement. All company policies and procedures in relation to Safety, Health and Environmental are regarded as supplementary to this policy.

Health & Safety Manual

The Company has a Health and Safety reference manual, which contains advice on key aspects of Health and Safety Law and documentation. Management is responsible to ensure that the manual is updated and maintained.

Company Safety Inspections

These will be regularly carried out by appropriate staff (with a frequency determined by the level of risk) as a means of actively monitoring the effectiveness of safety management arrangements.

Consultation with Employees

The Company has a pro-active approach to SHE matters and recognises the benefits of employees having input into this area. Therefore, in situations where there is no trade union appointed safety representative the Company will encourage participation. Consultation with employees will be provided directly through:

- Meetings.
- Verbal and written advice.
- Information, instruction and training.

GENERAL ARRANGEMENTS FOR HEALTH & SAFETY

Safety Team (SHEFQ)

Each member of the safety team will support the organisation in the fulfilment of his/her Health and Safety responsibilities and will be responsible for ensuring the implementation of the HSMS in their areas, fulfilling the requirements of the company's overall HSMS issues to be considered include:

- Risk assessments (both general and specific);
- Monitor legislation, review compliance and improve systems as appropriate;
- Ensure RIDDOR compliance and investigate accidents;
- Testing equipment and emergency procedures;
- Identify employee training needs;
- Disciplinary matters;
- Maintain necessary documentation and records and review these on a regular basis;
- Liaise with Compliance Dept.

Members of the Safety Team (SHEFQ) are as follows:

- C.E.O. – Mark Williams
- Compliance Director – Ricky Ray
- Operations Director – Craig Williams
- General Manager waste – Alan Kane
- General manager Land – Dougie Neill

Members of the Safety Team (cont'd)

- Operations manager – David Beveridge
- Transport manager – Eddie MacLeod
- Petterden Manager – David Dewars
- Dundee Manager – Kevin Logue
- Yard 2/Middleton Manager – David Dixon
- Garage Manager – Shaun Grealis
- Leith Manager – David Calder
- Glasgow Manager – Dale McBurnie
- Newcastle manager – Andrew Turnbull
- Safety, Health and Environment Manager – John Campbell

GENERAL ARRANGEMENTS FOR HEALTH & SAFETY

Information, Instruction and Training

The Company will provide information, instruction on SHE and where necessary training to provide the necessary skills and knowledge to achieve competence in their work.

The Company will provide adequate information, instruction and training when: -

- New employees join the Company – (Induction Policy).
- Employees are required to take on new responsibilities.
- Employees are required to use new work equipment or when existing equipment is changed.
- New technology is introduced into the workplace affecting employee activities.
- New or changed systems of work are introduced.
- Any specific training requirement is identified within the working environment of the Company.

Training will be recorded via a skills register updated regularly by the Company.

Supervision will be maintained with increased levels of supervision given to young persons and trainees which will be supported with risk assessment.

Communication and Consultation

Internal

The NWH Group communicates with employees as necessary on H&S issues by:

- One to one meeting;
- Group meetings/toolbox talks;
- Training sessions;
- Newsletters;
- Method Statements, COSSH, Risk Assessments/Safe Systems of Work;

All employees receive a copy of the companies SHE Policy (Statement of Intent) and any subsequent amendments. Employees are required to sign relevant documentation to confirm that they have read and understood the Policy and the duties that it places upon them.

Health & Safety Advisory Service

External audits will be carried out by an independent company.

Health & Safety Executive

The local Health and Safety Executive office (HSE) is: Belford House, 59 Belford Road, EDINBURGH, EH4 3UE

GENERAL ARRANGEMENTS FOR HEALTH & SAFETY

Housekeeping

The Company are committed to the provision of a workplace and a working environment that is safe. We ensure that wherever reasonably practicable we maintain arrangements for the safe and adequate heating, ventilation, cleanliness and lighting of workplaces. We will provide suitable clothing to protect employees from the effects of cold/wet weather should they be required to work outside for a prolonged period.

The Company expects the following to be adhered to in respect of:

Cleanliness

We expect all employees/contractors/visitors to work in a safe and tidy manner.

- Toilets, washing facilities and rest areas are provided for your comfort and convenience, please help to keep them clean.
- Do not let debris, food scraps, etc. accumulate.
- Spillages of fuels/substances or water etc. should be safely cleaned up as soon as possible.
- At no time should waste, materials or equipment be a danger to you, other employees or members of the public.
- Materials and equipment should be safely stored, and the area regularly inspected to ensure that it is not becoming untidy.
- All debris and waste must be disposed of safely and as soon as it is practically possible to do so.

Waste Disposal

- For unusual types of waste review the risk assessment and COSHH assessment applicable to the material or operation.
- Non-hazardous waste should be disposed of into the skip or appropriate container as soon as practical and should not be allowed to buildup and cause a hazard.
- Sharp debris and other hazards should be dealt with appropriately before any handling takes place.
- When moving heavy amounts of debris, mechanical aids should be used.

Safe Stacking and Storage

- All materials, products, equipment and debris should be stored in a manner that does not create or cause a hazard.
- Safe passage should not be hampered or hindered.
- Materials and products etc shall be kept away from doorways and fire exits.
- Materials when not being used should always be secure.
- Minimise the storing of materials and products at height.

Marking and keeping clear walkways, exits etc

- All exits and passageways are always to be kept clear unless there has been prior notification to management and all those affected have been informed for their own Safety.
- All fire exits should be kept free of obstructions, be adequately lit and be marked with relevant signage.

GENERAL ARRANGEMENTS FOR HEALTH & SAFETY

Housekeeping Cont'd

Checking Equipment

- All equipment should be checked before and during use and quarantined for repair if it has any form of defect, fault or problem.
- All equipment awaiting repair should be made safe and brought to the attention of a Manager/Supervisor immediately and 'Do Not Use' notices posted.
- See also the appropriate risk assessments/method statements.

Members of the Public

- They do not understand the risks to themselves and others created by your work, be vigilant of members of the public in your working area and challenge any who should not be there.
- Greater care must be taken when children are in the work areas. Children are strictly prohibited from entering any work environment without strict supervision.

Visitors, other workers, members of the public

- The Company accepts its responsibility to ensure the health and safety of all personnel who come directly or indirectly into contact with this organisation or the consequences of our activities.
- Other workers and members of the public will be considered ensure our work activities do not adversely affect them. This will be identified via risk assessment and control measures will be implemented, where required, to maintain a safe working environment.
- Visitors will always be met at reception by a Company employee who will make them aware of any safety rules or risks involved during the visit. All visitors will always be signed in/out and escorted.
- The employee being visited is responsible for ensuring the Health and Safety of their visitor, and that the visitor is provided with proper protection against hazards they may be exposed to during the visit and is fully briefed on any fire, safety and evacuation procedures.

GENERAL ARRANGEMENTS FOR HEALTH & SAFETY

Welfare Provision

- The Company will provide suitable toilet and washing facilities and request that employees ensure that they maintain these facilities in a suitably hygienic condition.
- Drinking water will be made available – all cold-water taps provide water suitable for drinking unless they are specifically marked to the contrary.
- Smoking is not permitted anywhere in our premises (except for designated areas) and company vehicles (See company smoking policy).

First Aid and Accident Reporting – (Company Premise/Off-Site)

The Company will ensure that an appropriate number of qualified First Aider(s) are appointed, details of those qualified will be displayed on notice boards and in the workplace areas. In addition, the company will supply and maintain first aid provisions as required by the Health and Safety (First aid) Regulations. These provisions are outlined as follows:

Company Premises

Any persons suffering an injury or occurrence of ill-health within The Company Premises should seek assistance from one of our qualified First Aider(s). Where necessary we will arrange for the injured/ill person to receive additional treatment either at an accident/emergency unit or by his/her GP. Employees should note that First-Aider(s) are not permitted to hand out any form of medication, this restriction applies for example to tablets for a headache or upset stomach.

Off-Site

- Any persons suffering an injury or occurrence of ill-health Off-Site should seek assistance from the site they are visiting's own qualified First Aider(s). Where necessary the Site Safety Manager will arrange for the injured/ill person to receive additional treatment either at an accident/emergency unit or by his/her GP.
- The Compliance Department is required to investigate the incident as soon as possible after the occurrence. Employees are expected to co-operate fully in any such investigation. A copy of the completed accident investigation report form will be held in the accident recording file and shall be recognised in the employee's own health and safety training, personal protective equipment issue and accident/injury record.

An accident/incident investigation must be completed:

- If the injury, disease or dangerous occurrence is reportable under RIDDOR.
- If the injury/ ill health was such that the injured or ill person was sent to hospital for further treatment.
- If the incident was such that serious injury or ill health could have resulted, even though such was not the outcome.

GENERAL ARRANGEMENTS FOR HEALTH & SAFETY

Fire Safety

- Fire safety risk assessments have established suitable arrangements for the detection and alarming of the outbreak of fire. Signs and notices are displayed (as necessary) throughout the company premises advising of the fire escape routes. Also details of our fire evacuation procedures are displayed throughout our premises.
- Whilst this is covered in induction training, employees should reconfirm at regular intervals that they remain familiar with the procedure. Employees, contractors and visitors must co-operate fully in any fire drill.
- The company maintains and will ensure that management and the SHE manager checks escape routes. Any obstacles will be removed, and any other hazards dealt with. Fire extinguishers are required by law to be checked once a year; this will be carried out by a competent person.

Personal Protective Equipment (PPE) and Clothing

We seek, so far as is reasonably practicable, to ensure the adequate control of risks by means other than through the provision of PPE and clothing, however the nature of the Compliance means that the use of such protection is required in a variety of circumstances. Employees are provided free of charge with PPE and clothing on a personal issue basis. Employees are instructed in correct usage and as necessary, in correct storage and maintenance.

Employees will be required to sign that they have received their allocated PPE/clothing and have received instruction and training in correct usage. Employees are reminded that failure to use correctly the PPE/ clothing with which they have been provided will result in disciplinary action being taken.

GENERAL ARRANGEMENTS FOR HEALTH & SAFETY

Safe Systems of Work and Safe Working Procedures (method statements)

Employees are reminded that failure to follow correctly, safe systems of work and safe working procedures will be viewed as serious and will result in disciplinary action. In some circumstances, work with a foreseeable high risk will need to be carried out. Specialist service providers under contract will normally undertake such work.

Examples of work with a foreseeable high risk include hot working (i.e. welding, burning, etc. outside of a workshop environment), working at height, working in confined spaces, excavation works and work on “live” electrical, mechanical, hydraulic and pressurised systems. Such work will be subject to the requirements of a permit to work provided by the principal contactor/client.

Contractors

- The Company requires the prospective service providers (Contractors) to furnish adequate and appropriate information (see Contractors Questionnaire) to indicate their competence to perform the work safely and without risks to health. This may, for example require the prospective service provider to provide proof of insurance, method statement, supporting risk assessments, certifications of competence of their employees and/or certifications of plant/equipment to be used in the execution of the contract.
- Employees of selected service providers (Contractors) are expected to arrive at site with the personal protective equipment and clothing necessary to protect them both from risks arising out of their own activities and ours. Failure to provide such equipment may result in the contractor being refused entry onto the site.
- Contractors must be met by a designated employee. This person is responsible for ensuring that the Contractors are provided with the information and instruction necessary to protect them from the risks arising out of our activities.
- Where Contractors are to undertake work with a foreseeable high risk, a permit to work is required before the high-risk work can start. This permit will need to be completed by the site Manager or, in their absence, the nominated competent person.

GENERAL ARRANGEMENTS FOR HEALTH & SAFETY

Clients Premises/Sites

All Staff/Employees who visit clients premises/sites have a duty to conform within the safety rules established at that location. This is particularly important when working within the vicinity of chemicals, flammable substances, and electrical switch-rooms. Staff will be advised of any appropriate procedures and practices beforehand and shall be equipped accordingly. Employees must wear/use any protective equipment issued to them for a specific environment. Failure to comply may result in disciplinary action being taken.

Employees will ensure that in addition to the Health and Safety at Work etc. Act, any code of practice or statutory regulation relevant to the work on site will be adhered to including but not limited to the following: -

- Management of Health and Safety at Work Regulations
- Construction (Design and Management) Regulations
- Construction (Health, Safety and Welfare) Regulations
- COSHH (Control of Substances Hazardous to Health)
- PUWER (Provision and Use of Work Equipment Regulations)
- LOLER (Lifting Compliance and Lifting Equipment Regulations)
- RIDDOR (Reporting of Injuries, Diseases and Dangerous Occurrences Regulations)
- Work at Height Regulations

Upon arrival at clients premises/sites employees:

- Report to an identified focal point.
- Request knowledge of any specific hazards related to the workplace. The Contracts Manager/Site Supervisor will have determined whether any specific hazards exist and will have disseminated this information to employees.
- No employee of NWH will commence any part of the works, without first getting initial clearance from the Premises/Site Manager concerned.
- Comply with any requests/instructions from the client's safety officer, fire Marshall or other authorised person in regard of any health and safety matter in order to co-ordinate the interests of the client.
- Refrain from wandering into unfamiliar areas without explicit permission.

In addition, all employees shall give consideration, where appropriate, to persons with extra needs and take appropriate preventative action. These may be:

- Persons with mobility impairment.
- Persons with visual impairment.
- Persons with hearing impairment.
- Person with learning difficulties.
- Persons whose first language is not English.

GENERAL ARRANGEMENTS FOR HEALTH & SAFETY

Risk Assessment

- We recognise that risk assessments are the most important part of effective health and safety management. Risk assessments help us to prevent accidents and ill health by considering the hazards that exist and how we manage them. From these assessments, we can develop safe systems and methods of work and ways to prevent problems occurring. The objectives of risk assessments are to formulate a system of control for hazards associated with the daily working environment and working practices.
- 'Specific' risk assessments are required by certain regulations. These regulations may contain a specific reference to the requirement for risk assessment or may refer to the Management of Health and Safety at Work Regulations for this requirement.
- The Company will also implement the requirements of the Manual Handling Compliance Regulations by assessing the risk to its employees wherever manual handling Compliance take place. Risk Assessments will be recorded, reviewed and revised as necessary to accommodate any changes in the methods of work, plant, equipment, material or changes in the working environment. Copies of Risk Assessments shall be made available in each process.
- Where there is a requirement to use display screen equipment the Company will assess the risk to its employees by complying with the Health & Safety (Display Screen Equipment) Regulations. The procedure is to ensure that all reasonable steps are taken and will detail the range of hazards associated with working Compliance together with any necessary remedial actions.

It is our policy to:

- Carry out suitable and sufficient risk assessments of our activities.
- Identify and carry out those specific risk assessments we are legally required to carry out.
- Carry out detailed risk assessments on hazardous activities.
- Implement the control measures and further actions required to reduce risk identified in the assessments.
- Bring the significant findings of the risk assessments to the attention of those affected.
- Amend our risk assessments when changes occur and review them regularly to ensure they are kept up to date.
- Train staff on the principles of risk assessment, the identification of hazards, and the implementation of control measures to remove or reduce the risk.

Directors / Managers will carry out Risk Assessments related to their process with the operators involved in the work activity. The content of risk assessments will be made known to those involved in the work and will include their input. Assessments will be reviewed where work commences at a new site, where the work activity changes or annually thereafter. The compliance department when required, will assist with the initial assessments to provide information and training, and carry out audits of the process.

GENERAL ARRANGEMENTS FOR HEALTH & SAFETY

Monitoring, Audit and Review of Safety Performance

Employees are reminded that they have a duty to report immediately to their Manager/Supervisor, any defect or safety concern of which they become aware. We will review our safety performance on a regular basis and draw upon all available information to establish plans for ongoing legislative compliance and improved Health and Safety risk control.

HAZARD ARRANGEMENTS

Machinery and Other Work Equipment

- The NWH Group Compliance require the correct use, setting, inspection, testing and/or maintenance of a wide variety of machinery and other work equipment.
- All employees will receive information, instruction, training and supervision, as necessary, to enable them to demonstrate competency in the correct use of machinery and other work equipment. Employees will be required to inspect and/or test machinery or work equipment prior to or during use (i.e. to ensure the correct operation of guards) and to record that they have done so.
- Many machines and other items of work equipment present risk of injury as a result of contact with sources of power such as electricity, compressed air and stored energy sources (such as cylinders of compressed gases). We are committed to ensure that such equipment remains in a safe condition through programmes of inspection, testing and/or maintenance.
- The regular and/or repetitive use of some hand tools may present a long-term risk of work-related upper limb disorders. Such tools must be properly used and maintained at all times. Employees must report if they are suffering aches, pains, headaches or any other symptoms, which may be attributable to their use of equipment at work.
- Employees must follow the agreed safe working procedures and safe systems of work and to refer to the relevant risk assessment for the task being performed or the equipment being used.

Electrical Appliances

The NWH Group will ensure that a company Approved Supplier will carry out inspections to comply with Health and Safety regulations regarding electrical appliances.

In accordance with the regularity with which various types of appliances and areas within the business must be tested we have agreed that there will be two types of inspection;

Annual Testing (PA)

- Production/Warehouse Area Equipment
- Public Access Areas (Receptions/Waiting Areas)
- Office Equipment
- IT Equipment

Testing Every 5 Years

- Mains Electrical Supply (portacabins Yearly)

HAZARD ARRANGEMENTS

Vehicles

- The NWH Group Compliance involve the use of road vehicles. We ensure that all our vehicles, including towed trailers and plant, are subject to regular inspection, testing and maintenance, as a minimum to meet statutory requirements.
- Only trained, licensed/certified and authorised persons will be allowed to drive company vehicles, including towed elements (see Company Vehicle Policy); disciplinary action will be taken against any other person found to be driving without authorisation. Disciplinary action will be taken against Company Authorised Drivers, driving a company vehicle under the influence of alcohol or drugs and/or driving in any way in an unsafe manner.
- Employees must report if they are suffering aches, pains, headaches or any other symptoms, which may be attributable to their use of vehicles or other mobile plant at work.

Plant Equipment (Including Forklift Trucks)

- The Supervisor shall ensure that all operators are suitably trained and are in receipt of regular refresher training. All drivers shall be authorised in writing to operate vehicles on NWH Group property. Vehicles shall be regularly maintained in accordance with manufacturer's recommendations and checked daily by operator; records shall be kept of all inspections.
- Traffic routes shall be regularly checked by the Supervisor/Operator. Where loads restrict the vision of the operator vehicles shall be reversed to the drop off area. Speeding will not be permitted at any time.

Hazardous Substances

- Hazardous substances stored, handled, transported, used and disposed of are subject to assessment under the Control of Substances Hazardous to Health (COSHH) Regulations.
- Employees will be provided with all necessary information, instruction and training to protect them from the risks associated with the hazardous substances in use. Employees will be expected to follow safe working procedures and safe systems of work including the correct use of any personal protective equipment and clothing.
- It is the responsibility of the SHE Manager and the Departmental Managers/ Supervisors, to ensure that employees are given the assessment sheets relevant to the substances they are likely to encounter in their job and ensure they are made aware of the control measures identified.
- Employees must report if they are suffering aches, pains, headaches or any other symptoms, which may be attributable to their use of hazardous substances at work.

HAZARD ARRANGEMENTS

Noise and Vibration

- Where noise assessments have confirmed that noise levels require ear protection, we will provide such protection as necessary.
- Ear protection is available to all persons and must be worn correctly (i.e. in accordance with the training/instruction given). Failure to do so will result in disciplinary action.
- Some work activities may present a risk of long-term ill health as a result of whole-body vibration (WBV) and hand arm vibration syndrome (HAVS). Examples of such work activities may include the use of powered percussive tools. For such ill health effects to develop would require these activities to be routinely and regularly undertaken for prolonged periods.
- Employees must report if they are suffering aches, pains, headaches or any other symptoms, which may be attributable to their use of noisy or vibrating equipment at work.

Manual Handling and Lifting (see also specific Manual Handling Policy)

- Manual Handling Compliance undertaken by our employees are subject to assessment under the Manual Handling Compliance Regulations 1992.
- All manual handling activities will be assessed to consider whether the manual handling operation can be avoided altogether. If the operation is deemed to require manual handling activities then an assessment in accordance to Schedule 1 of the Manual Handling regulations will be undertaken and subsequent control measures will be implemented to reduce the level of risk to as low as reasonably practicable based on the assessment of the risk of injury.
- Employees who are required to carry out manual handling and lifting Compliance as a regular part of their work are given basic training in correct lifting and handling techniques.
- Employees likely to carry out, or work near, any heavy lifting are always issued with safety footwear to be worn when there is a risk of injury as a result of a falling load.
- Any employees suffering from an acute injury or long-term ill health condition (whether due to work or any other cause), likely to be aggravated by Manual Handling or Lifting, must report this condition immediately to his/her Departmental Manager/Supervisor.

HAZARD ARRANGEMENTS

Violence

- The possibility of violence will vary significantly between different client's environments, so it is necessary to assess the nature and extent of violence encountered at work and consider the most practicable means of reducing such violence.
- The NWH Group does not accept that it is part of any employee's duty to be subjected to verbal abuse, threats or physical assault and if or when such abuse is experienced will provide such personal support and guidance as is necessary to the employee to ensure that the effect of such abuse is minimised.
- Employees are encouraged to report incidents of violent behaviour to which they have been subjected, to Departmental Managers/ Supervisors who will discuss/investigate the incident and, where possible, act to prevent a recurrence. The action taken or proposed action should be recorded.
- Where an employee is absent for more than three days as a result of a violent incident then the The NWH Group Incident Reporting Procedure should be followed.

Working at Height (see also specific Working at Height Policy)

- Working at height poses additional risks to persons carrying out those activities which they would normally carry out at ground level.
- We will use the avoid, prevent or minimise procedure when risk assessing any work at height to try where possible to eliminate any requirement. All reasonable steps shall be taken by the company to provide a safe working environment for employees required to carry out their trade or professional skills at height.
- The company shall provide the necessary preventive and protective measures to prevent falls of persons or materials from the workplace and will liaise with any other persons involved in the work activity. The employee and any other person involved in the work activity shall cooperate in the implementation of this policy.
- The responsibility for the implementation of this section of the policy on behalf of the company lies with General Managers.
- The company shall ensure that sufficient and effective arrangements are in place for securing the Health and safety of workers with procedures in place for dealing with Health and Safety issues.
- Suitable information and training will be supplied to staff relating to working safely at height with Safe Systems of Work compiled.

THE NWH GROUP

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