



Health & Safety Policy & Arrangements

The Directors of Wales Environmental Ltd are determined to achieve high standards of health and safety for all members of staff and others affected by our activities. Therefore, Llyr Williams Managing (Safety) Director has undertaken the responsibility to oversee the formulation of this policy and all attached procedures. In order to ensure that the ownership of this policy is accepted throughout the company he has enlisted the support of all personnel.

We have committed ourselves to continuous improvement of this safety management system in line with OHSAS 18001 and all company procedures in order to ensure excellence of work and protection of our workers, others affected by our activities and the environment.

We are convinced that the risk assessment and subsequent control of all processes and procedures is the key to safety, efficiency, the provision of a professional service and will contribute to improved quality of life. This leading to a more efficient company along with long cost savings.

The general arrangements for the management of health and safety along with organisation arrangements to facilitate the adoption of health and safety throughout the company are set out in this policy and are available to all employees. More detailed information affecting the management of health and safety is enclosed in the health and safety procedures manual issued to all key management personnel.

The company is keen to communicate on health and safety matters and through formal training and an informal open door policy will continue to gather and disseminate health and safety information.

Health and safety management is delegated to line management, who will receive the full support of the directors. However, we look to the support and professionalism members of our staff to make this policy truly effective.

1. Organisation

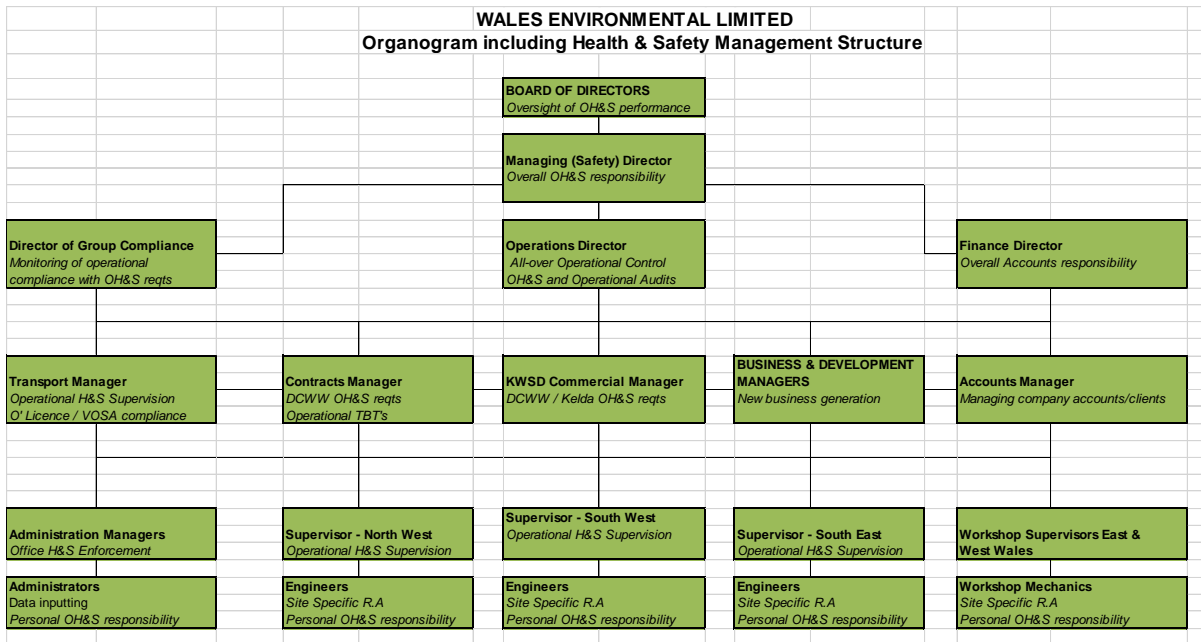
The Directors of Wales Environmental are in direct contact with Professional Staff who are responsible locally for the management of health and safety of those based at, and working at Clients Sites. Staff will report on health and safety matters to the Managing Director also known as the Safety (Managing) Director. Llyr Williams is responsible for health and safety and will in turn keep others informed on such matters as require their attention.



Llyr Williams will maintain the day to day standards of health and safety by the provision of such tools, equipment and supervision as are necessary to ensure the health and safety of site staff.

All levels of staff and management will have access to advice and the assistance of the health and safety adviser.

A copy of the Company H&S Management structure is below.



2. Responsibilities

It must be recognised that safety is the responsibility of all Wales Environmental employees and the role of the safety advisor is to act as the competent person providing the expertise and support necessary to enable each company representative to carryout their responsibilities with regards to occupational health and safety, safety management and loss control systems.

1.1. Health and Safety Advisor.

Reporting to the Managing Director, the health and safety adviser's role is to monitor and improve health and safety standards, collect data on substances used by the company, investigate accidents and dangerous occurrences and advise site management and supervisors in all aspects of health and safety at work. The health and safety advisers are responsible for the organisation of all health and safety training courses.



1.2. Health and Safety Supervision

Site health and safety supervision will be undertaken by Llyr Williams who has accepted responsibility for implementing the company health and safety policy. The need for training in all aspects of health and safety will be assessed in order to enable Llyr to carry out his duties effectively.

1.3. All Employees and Sub-Contractors

All employees and sub-contractors will undertake their work with due regard for health and safety of themselves and others and will conform to the company health and safety policy.

No work should be undertaken that endangers the health and safety of those doing the work or anyone else that may be affected. In any case of doubt as to the safe procedure to be followed, either Llyr Williams, Dave Busby or if necessary, the health and safety adviser should be consulted. Failure to co-operate by company personnel in matters of health and safety will result in disciplinary action.

1.4. Sub-contractors

All sub-contractors will be competent and comply with the company health and safety policy and are expected to know the standards of health and safety applicable to their work. At all times they should ensure that their work is conducted so that it complies with legal standards for safe methods of work and which are without risks to health. Detailed guidance on working procedures is available on request to contract management or the health and safety adviser. Sub-contractors not undertaking their work in a safe and healthy and manner may be removed from site. Further general guidelines applicable to all employees are given later in the document. The company will provide to any employer of externally sourced sub-contract labour health and safety information relevant to the works to be carried out. The employer is required by law to ensure that his employees are given the information before work commences on site.

2.5 The Safety (Managing) Director's Duties

The Safety Director's duties will, 'so far as is reasonably practicable', be:

- To keep the Board of Directors advised as to their responsibilities;
- To ensure adequate financial arrangements are made to meet statutory requirements;
- To ensure that an effective management system is in place for the management of health and safety within the company and the system is periodically audited;
- To ensure that all senior managers are both competent and fully committed to ensuring the effectiveness of the health and safety management system;
- To ensure all employees receive adequate and relevant training;



- To provide a visible management commitment to higher standards of health and safety;
- To ensure all Company employees and all persons having an interest, are made aware of this Policy and understand their individual duties and responsibilities;
- To monitor the effectiveness of this Policy and to make revisions as necessary;
- To analyse site inspection reports and any accident or dangerous occurrence / near miss reports and to ensure that corrective action is taken; and
- To ensure that documentation, registers and certificates are maintained and that notification and reporting procedures are carried out.
- When the company is acting as Principal Contractor, the Safety Director is responsible for ensuring a system of management to effectively control and co-ordinate the activities of contractors.

2.6 . Health, Safety and Environment Packs

The company will maintain a Health, Safety and Environment Pack for the information of persons who organise site work. In any case of doubt as to the proper procedure or legal requirements for particular situations the health and safety advisers should be consulted.

2.7. Use of Substances

The company will ensure that information on substances hazardous to health is available at all times. The COSHH management system is being continually updated and new substances not covered can be assessed promptly. The assessment forms will be made available to any person handling a substance.

2.8. Health and Safety Reference Information

A library of relevant publications will be maintained in order to provide up-to-date reference documents on all aspects of health and safety relevant to the company's business. The library is maintained at the Administration Office.

2.9. Company Policies & Assessments

The company will maintain independent policies and assessments relative to the hazards that exist within work activities. This section sets out to define policies adopted by the company in respect of health and safety legislation currently in existence. Detailed application of these policies is set out in the relevant section of the company's Health, Safety & Environment Packs



2.10. Control of Substances Hazardous to Health (COSHH)

All substances to which employees are exposed will be assessed. Those which are classified as harmful under the Chemical Hazard Information and Packaging Regulations (CHIP) and any process which exposes employees to a substance which presents a hazard to the health or safety of those handling or using it will be assessed and where reasonably practicable replaced by safer substitutes. Where a safer substitute is not available then the system for handling will be arranged so as to reduce the risk as far as is reasonably practicable.

Assessments are to be provided on site for all substances used. Where the use varies from that described a separate assessment is to be made.

2.11. Assessment of Work Places and Activities

In accordance with the Management of Health and Safety at Work Regulations, line managers will ensure that risk assessments of the workplace and work activities are undertaken.

Every work activity will be assessed by a competent person and the result of the assessment recorded.

2.12. Display Screen Equipment

The company will comply with the Health and Safety (Display Screen Equipment) Regulations.

Information to enable the assessment of work stations is provided in the Health, Safety & Environment Packs. Work stations will be assessed using the guidance provided. New workstations provided will meet the requirements of the regulations and all users of display screen equipment will be entitled to free eye tests and the provision of visual correction devices so far as is reasonably practicable.

(See reference material for further information)

2.12.1. Personal Protective Equipment

The company will comply with the requirements of the Personal Protective Equipment at Work Regulations and will ensure that all employees and sub-contractors are equipped before commencement of work.



Details of requirement for Personal Protective Equipment, its selection and use are given in the Health, Safety and Environment Packs and identified in risk assessments.

2.12.2. Workplace Safety and Welfare

Wales Environmental will comply with the Workplace (Health, Safety and Welfare) Regulations. The company will make provision for the health, safety and welfare of employees at workplaces appropriate to the activity, number of employees and type of premises. Where operatives are required to visit sites other than those owned or controlled by Wales Environmental management will ensure appropriate welfare facilities are available to operatives.

Company vehicles will be equipped with appropriate welfare facilities so far as is reasonably practicable.

2.13. Manual Handling

The company will comply with the Manual Handling Operations Regulations, paying regard to the variable nature of the working environments. Manual Handling will be avoided if at all possible by the use of mechanical aids or alternative materials and techniques. Those persons in charge of work activities will ensure that work is organised so as to prevent unnecessary manual handling.

The company will ensure that an assessment is made and work is organised in order to avoid unnecessary manual handling, but where manual handling is necessary, it can be completed without risk of injury.

2.14. Work Equipment

All work equipment used by the company will meet the requirements of the Provision and Use of Work Equipment Regulations.

In order to protect employees using work equipment in the course of their duties, the company will arrange for regular examinations and tests on such equipment as stipulated by legislation. All inspections will be carried out by a competent person experienced in the use of suitable testing equipment.

New work equipment will be selected to comply with the requirements of current legislation, and existing equipment will be replaced as soon as is reasonably practicable. All equipment is to be maintained in a safe working condition. Periodic inspection carried out in line with the manufacturer's data sheets will ensure that faulty equipment is identified and taken out of service or repaired. Training will be provided to operatives in the use of the equipment subject to risk assessment.



Hired equipment will be obtained only from suppliers who maintain hire equipment in compliance with the Regulations. All equipment supplied will be subjected to inspection.

The company will:

- 2.14.1. Ensure that tests and examinations of all listed equipment are completed before equipment is taken into use
- 2.14.2. List all items of equipment requiring statutory inspection with details of inspection intervals and who is nominated to inspect and keep records
- 2.14.3. Ensure that all listed equipment is inspected at the required intervals by a competent person
- 2.14.4. Liaise with the competent person
- 2.14.5. Deal with defects listed in the reports
- 2.14.6. Keep records of inspections and thorough examinations

2.15. Fire and Emergency Procedures

Fire and emergency procedures will be appropriate to specific sites where company employees are employed and will be provided in accordance with statutory guidance.

Fire fighting equipment will be provided and maintained in safe condition in accordance with Fire Regulations and fire risk assessments. In addition, all hot work will be completed in line with permits to work and attended by fire fighting equipment.

Emergency procedures will be in place at company sites and personnel working at client premises must establish the host's fire and emergency procedures prior to commencement of work. Emergency procedures are to be tested periodically in accordance with codes of practice and company policies.

2.16. Electricity

All electrical systems are to be maintained in a safe condition in compliance with the Electricity at Work Regulations. All work on electrical systems is to be carried out in accordance with permit to work procedures where applicable.

All portable appliances will be listed and tested periodically, dependent on their use and conditions of service.

2.17. Noise and Vibration



The company will ensure that employees are not exposed to levels of noise or vibration likely to adversely affect their health as far as is reasonably practicable.

Environments in which company employees work will be assessed for noise hazards. Where these are static sources of noise which exceed 85dB(A) these will be clearly indicated and hearing protection of an appropriate type will be mandatory. Where transient exposures can be anticipated assessments will be made and appropriate measures taken to avoid the hazard. Exposure to excessive vibration will be avoided, as far as is reasonably practicable, by the selection of tools and processes with low vibration characteristics. Where there is a residual risk, PPE or work sharing techniques will be applied.

Company employees should not be exposed to harmful levels of noise or vibration if this policy is followed. There is a need for individuals to recognise the potential harm that exposures to high levels of noise or vibration cause and take steps to avoid exposure.

2.18. Employment of Young Persons

The company will comply with all statutory requirements in relation to employing young persons.

2.19. Company Vehicles and Mobile Phones

All company vehicles are under the custody of the driver who is expected to maintain the vehicle in accordance with legal requirements and company policy.

The company recognises that the use of hand-held mobile telephones in vehicles could lead to careless driving, dangerous driving or driving without due care and attention. It is therefore company policy that hand-held mobile phones are not used within vehicles whilst in motion.

2.20. Substance Abuse

The use, possession and/or distribution of alcohol or non-prescribed drugs on company or client premises is strictly prohibited. This includes reporting for work whilst under the influence of alcohol, drugs or any other substance (including solvents or solvent-based substances) and/or allowing to work or working with any employee who it is believed is in breach of this policy. Failure to comply with this policy will result in disciplinary action which could include dismissal.



Employees who carry out work under the control, instruction or direction of a client and/or based on clients' sites are required to comply fully with any site specific rules in relation to drugs and alcohol.

2.21. First Aid

The company will comply with the First Aid at Work Regulations and provide or ensure that suitable and sufficient first aid cover is provided at all times.

The company will provide suitable and sufficient training to appointed persons or where applicable first-aiders.

2.22. Smoking

All company premises operates a non-smoking policy. All enclosed and substantially enclosed areas will be designated non-smoking areas and appropriate signage will be displayed.

Vehicles which are used by more than one employee – even at different times or intermittently - will be designated non-smoking areas. Appropriate signage will be displayed.

All employees working on the premises of a client are required to comply with the requirements with regard to smoking. Anyone infringing such a requirement is liable to be removed from the site premises and will be subject to disciplinary action, which could ultimately lead to dismissal.

2.23. Lone Working

The company will ensure that employees and self-employed contractors who are required to work alone or unsupervised for significant periods of time are protected from risks to their health and safety.

It is the company's intention that hazards related to lone working are either removed or reduced to acceptable levels.

The risks of working alone in given situations will be assessed to establish whether the work can be done safely by the unaccompanied person. Particular attention will be given to the remoteness or isolation of the workplace, along with problems of communication, interference, violence or criminal activities.

2.24. New & Expectant Mothers



The company is aware of the statutory requirements relating to work undertaken by new and expectant mothers and will comply with these requirements. New and expectant mothers will be given necessary information, instruction and training to ensure they may work safely and without risks to health.

The company will take all reasonable steps to safeguard the health, safety and welfare of new and expectant mothers and their unborn children. In order to accomplish this, the company will assess all risks to new and expectant mothers arising from their work activities and take suitable preventative or control measures. Relevant training will be provided in identifying risks and implementing controls. The company undertakes to monitor the work undertaken by this group of employees especially during development of pregnancy in order to assess ability to work safely and with risk.

2.25. Training

The training needs of individuals will be identified by management. Appropriate training will be provided as necessary. General training requirements will be provided on new technology and procedures as required and as necessitated by changes in legislation

2.26. Consultation with Employees

The company consults with employees and safety experts in compliance with legislation. A consultation between the health and safety representative for each region and all employees occurs on a monthly basis. During these consultations the H&S representative will inform employees of any new equipment or systems of work; employees will have a chance to raise any concerns or issues before the management make any H&S decisions.

2.27. Contractor Selection and Management

The company requires that any contractor working on behalf of ourselves completes a supplier questionnaire. This is then screened by the management team and if deemed suitable the contractor will be entered into the company's approved suppliers register.

2.28. Health Surveillance

The company is aware of the duty it has to its employees to monitor the health of its employees. All employees are asked to check themselves for signs or symptoms of ill health. Any employee who believes they have any signs or symptoms of ill health are required to report it to their line managers who have a duty to act by getting a responsible person or first aider to make basic checks. For slightly more complicated assessments, an occupational health nurse can ask about symptoms or carry out an examination.

2.29. Asbestos



Wales Environmental Limited employees should not come across asbestos whilst carrying out their duties. If they do believe themselves to be at risk employees are required to immediately inform line managers. A risk assessment will be completed and a decision made as to whether to get a licensed contractor to remove the risk.

2.30. Dangerous substances and explosive atmospheres

The company is aware of the DSEAR Regulations 2002 and wherever possible remove the risk of dangerous substances on site and in the workshop. Where hazardous substances are required measures to reduce risk are put in place.

2.31. Pressure systems

Wales Environmental Limited is aware of the duties required under the Pressure Systems Safety Regulations 2000 (PSSR). Any pressure systems will be regularly maintained by a competent person who has the necessary knowledge, skills and independence to undertake their role and responsibilities effectively. Training will be provided to anybody operating or maintaining the equipment and suitable protective devices implemented and maintained.

2.32. Monitoring safety performance

Wales Environmental Limited reports on H+S performance on a monthly basis during board meetings. During board meetings H+S targets and objectives are set and reviewed. Periodic audits on H+S will be performed by an internal and external auditor. Any major breach in H+S is reported to the board who will take appropriate action.

To check our working conditions, and to ensure that our safe working practices are being followed, we will;

Carry out spot check visits to work sites;

Regularly ask our customers their opinions of our site practices, e.g. about the level of tidiness during the course of work, and invite their criticism;

Hold regular Health & Safety meetings with employees' representatives.

Operate an 'Open Door' policy; i.e. any member of staff may discuss any Health & Safety related issue at any time with The Commercial Director or The Managing Director.

The Commercial Director is responsible for investigating accidents.

The Commercial Director is responsible for investigating work-related causes of sickness absences.

The Commercial Director is responsible for acting on investigation findings to prevent a recurrence.



2.33. RIDDOR Reporting

It is the policy of Wales Environmental Ltd to:

Record all accidents, dangerous occurrences and cases of industrial illnesses and to retain records at our company office.

Investigate all accidents, dangerous occurrences and cases of occupational illnesses. Such investigations will be carried out by either our management or, in some instances, our safety adviser who produce a written report with recommendations designed to try and prevent recurrence, for dissemination and action within our company.

In the event of a major accident or incident that is reportable to the Health & Safety Executive (HSE) under RIDDOR 2013, to arrange for our safety advisor (HSQE Manager) to carry out an investigation on our behalf. They will prepare a written report based on their investigation, which will be made available to the HSE if requested.

To annually collate and analyse accident and incident data to identify trends or topics that might require attention.

Encourage Staff to submit "Minor event / Near Miss" reports to management on pre-printed forms that are freely available to all members of staff. The idea behind this is learn about and then try to eradicate or reduce those minor incidents or bad habits that could lead to potentially more dangerous and/or costly events.

Make the Accident Book freely available to all staff and to encourage staff to make entries for even the most apparently trivial accident.

To ensure confidentiality and security of all personal information.

2.34. Cooperation & Coordination Policy Statement

Being a small company with extremely good day-to-day communications between managerial and operational staff, health and safety information is constantly traded. Sometimes this is verbally but often it is also written, generally in the form of risk assessments and method statements.

All Staff must cooperate with all Health & Safety policies and procedures that the company has in place. These are explained and, where necessary demonstrated, during their initial induction and at regular intervals throughout their employment. All members of Staff are actively encouraged to communicate any questions, queries or concerns they have with both their Team Leaders and Senior Management at any time.

When on site, Team Leaders/Supervisors must complete both a practical 'Site Assessment' (as detailed in our Risk Assessment RA1) and written 'Site Check List'. This is to ensure that they communicate with our customers on all issues, including safety, and that they



themselves can familiarise themselves with the site, ensure it is both safe and that they are complying with all relevant Health & Safety matters.

When we work as a subcontractor, we ensure that the Principal Contractor is provided with all risk assessments and method statements relevant to our work. All members of staff are aware that when working as a subcontractor they must comply with the Health and Safety Information provided by the Principal Contractor and carry out safe working practices at all times. They must report to the Principal Contractor about any issues arising on site regarding Health and Safety or any other matter.

Health and Safety Guidelines

All employees and sub-contractors working for the Company are required to comply with the laws of the United Kingdom and the Company's Health and Safety Policy.

For the purposes of Health and Safety the primary legislation is the Health and Safety at Work etc. Act 1974. Should more specific legislation be applicable work must be organised in line with the specific requirements of this legislation.

The following guidelines are not to be viewed as a substitute for compliance with statutory duty. But they are applicable to all workplaces under the control of the Company and to all persons at work in said workplaces and apply to direct employees, sub-contractors or others. Unless equally suitable guidelines are agreed in discussion with third parties.

2.35. Conditions of Work

All employees and sub-contractors will be provided with a copy of the Company Health and Safety Policy together with the organisation and arrangements currently in place.

Sub-contractors are to provide a copy of their Health and Safety Policy and organisational arrangements on request. In addition, a copy of the job specific 'Method Statement' specifying in detail the work and systems of work to be followed is to be provided. All work must be assessed in line with the Management of Health and Safety at Work Regulations.

Sub-contractors must ensure that suitable supervision is in place for their own employees to ensure that risks to health and safety are suitably assessed and controlled. All working methods will be assessed against approved codes of practices and guidance published by the authorities.

Unsafe conduct will not be tolerated at workplaces under the Company's control and persons working unsafely may be asked to leave the site

2.36. General Safety

All persons on site are to be familiar with and comply with safety rules.



2.37. Fire Precautions

The company requires all working on site to be familiar with the local emergency procedures. Pay attention to the location of fire extinguishers, means of raising an alarm and emergency escape routes. Ensure that all flammable substances are stored correctly. Avoid burning waste on site.

2.38. Access & Egress

All walkways and work access/routes must be kept clear at all times so far as is reasonably practicable. In cases where work necessarily obstructs safe access/egress, the provision of alternative routes must be designated in consultation between all affected parties. Storage of materials and waste must be controlled so as not to obstruct access/egress routes.

2.39. Housekeeping

All employees/operatives must ensure that their work activities are carried out in a clean and orderly manner. Welfare facilities are provided for the use of all site personnel and must be used appropriately, abuse of welfare facilities will result in disciplinary action. Waste and materials must be cleared away on the completion of tasks and/or at least daily. Materials being used must be stored appropriately in order to reduce the risk of trip hazards.

2.40. Confined Spaces

In all cases of confined spaces the Confined Spaces Regulations must be adhered to.

A confined space is defined as an enclosed space with a reasonable foreseeable risk of:

- a) A serious injury from fire or explosion
- b) Loss of consciousness or asphyxiation from dangerous fumes
- c) Drowning from an increase of liquid volume
- d) Asphyxiation from a free flowing solid
- e) Loss of consciousness from increased body temperature

Where reasonably practicable entry into confined spaces must be avoided, assessments of confined space work is to be carried out by a competent person, trained in confined space entry before work is undertaken in confined spaces. Where lack of oxygen or toxic gases may be present work must not commence until air tests have been carried out. Where hazardous atmospheres are identified these must be made safe if practicable with respiratory protective equipment being provided only as a last resort. All wearers of RPE must be trained in correct used.



2.41. Working at Height

All working at height will be identified and where unavoidable will be controlled in line with the Working at Height Regulations. In all instances the principle aim will be to prevent falls by safe working platforms, with fall arrest systems being considered only when safe working platforms are not reasonably practicable.

2.42. Personal Protective Equipment (PPE)

The requirement for PPE is to be identified as a result of risk assessment. Where the risk assessment identifies the need for PPE is identified this will be supplied by the Company and must be worn as a condition of employment. Typical equipment that will be provided for general use by all entering construction sites includes

- 2.42.1. Head protection – to be worn unless the site manager deems that there is no risk of head injury.
- 2.42.2. Foot protection
- 2.42.3. High visibility clothing – suitable for site conditions
- 2.42.4. Weather proof clothing
- 2.42.5. Eye protection
- 2.42.6. Hand protection

Other personal protective equipment will be identified and supplied where risk assessments identify risks that cannot be controlled by other means.

2.43. Hazardous Substances

Use of substances that are hazardous to health should be carried out in line with the Control of Substances Hazardous to Health Regulations or in some cases more specific legislation.

The Company will ensure that all substances used are assessed in line with the COSHH Regulations where applicable and where reasonably practicable substitute the substance for a safer alternative.

Manufacturers Safety Data Sheets (MSDS) will be obtained for each material used and where hazards identified COSHH Assessment completed with information provided to employees.

All containers will be appropriately marked as to their contents.

2.44. Young Persons



All young person (16-18) employed by the company will be assessed to establish suitability to the working environment. Under no circumstances are young persons to be required to carry out work that is beyond their capability and training. In the event that young persons are allocated tasks they are to be suitably supervised.

Signed: *Llyr Williams*

Llyr Williams
Managing Director

Date: 03/01/2019