WEST LONDON WASTE AUTHORITY (WLWA) HEALTH AND SAFETY POLICY



West London Waste Authority
Civic Centre, Lampton Road, Middlesex TW3 4DN

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1.1. Foreword by Chair of the Authority

We (The Authority) are fully committed to excellence and continuing improvement in the management of health and safety and regard it of prime importance to safeguard the health, safety and welfare of its employees and others in all of its operations.

We recognise and fully accept our own responsibility in providing strategic health and safety governance and actively and reactively approving the distribution of resources, as necessary, to resolve health and safety risks.

This document sets out the Authority's Policy on Health and Safety, outlining the roles and responsibilities for health and safety at all levels and describing the general arrangements, instructions and rules to be followed by all of our employees to ensure a safe working environment for themselves and others.

As the person in operational charge of the Authority, the Director will implement this policy document on behalf of the Authority, and will produce and maintain a signed Health and Safety Policy Statement. The Director will also develop an annual Health and Safety Plan to be approved and monitored by the Authority.

Managers are required to attach site-specific Safe Working Procedures and instructions to the policy document and issue them to the employees directly in their care.

We require all operational managers and supervisors to adopt a pro-active risk based approach to managing health and safety by completing the necessary risk assessments and embedding key operational health and safety precautions and safe working practices within their day-to-day operations.

Success in the effective management of Health and Safety clearly involves all employees. Consequently we expect every member of staff to be fully committed to creating a positive health and safety culture within the Authority and in turn we fully welcome and encourage employee involvement in the identification of health and safety risks and improvements.

It is the duty of each of the Authority's employees to familiarise themselves with this Policy and the relevant safe operational procedures and instructions that apply to their place of work.

By these actions we will not only prevent accidents but also bring about continuing improvements in our overall business performance and meet our associated legal, moral, social and economic responsibilities.

Signed by the Chair on behalf of all members of the Autho

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Signed:	Date:

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1.2. West London Waste Authority (WLWA) Health and Safety Policy Statement

- The West London Waste Authority (WLWA) is committed to ensuring, as far as reasonably practicable, the health, safety and welfare of their employees and other persons who may be affected by their activities and the services they provide and control.
- 2 The responsibility to meet this requirement is considered at least equal to that arising from any other business objectives of WLWA.
- WLWA will develop and maintain an Occupational Health and Safety Management System within the framework of HS (G) 65. A Management Appointee will be appointed to ensure that the system is continually developed, implemented and improved. The current Management Appointee is Ken Lawson, Senior Contracts Manager.
- The Director of WLWA is responsible for the adequacy of this Health and Safety Policy and for planning arrangements to implement it.
- WLWA will strive towards achieving the highest standards of health and safety management by making continual improvements to its policy and arrangements. While compliance with all relevant statutory duties and legal requirements is considered a minimum standard, best practice will be adopted to minimise risks to health and safety and prevent injuries and other losses wherever possible.
- Duties, functions and responsibilities for health and safety will be defined at all levels within the policy and in associated arrangements, procedures and codes of safe working practice. Employee responsibilities are further outlined in the WLWA 'Health and Safety Booklet' issued to all employees.
- All employees are reminded that they have a legal obligation to take reasonable care of their own health and safety and the safety of others who may be affected by their actions or failure to act, particularly members of the public. In order to meet their responsibilities, all staff will bring to the attention of their manager or supervisor any difficulty experienced in meeting these requirements and should remove themselves and anyone in their charge (including visitors and members of the public) from hazards giving rise to imminent risks of harm.
- It is the duty of all employees to familiarise themselves with this policy statement, operational procedures and instructions and to co-operate with their employer as necessary to uphold the terms of the Health and Safety Policy. Employees are reminded that any failure to meet these requirements may be subject to disciplinary action.
- 9 WLWA will provide such information, instruction, training and supervision as is needed to enable its employees to understand and meet their health and safety responsibilities and will ensure that appropriate resources are made available for these purposes.
- WLWA is committed to identifying and controlling hazards through risk assessment. Safe working methods based on risk assessments will be introduced to fully inform those at risk and control unavoidable risks. To ensure consistency all risk assessments will be documented according to a standard procedure.
- Health and safety objectives will be integrated within the WLWA health and safety processes.

 Progress and achievement of objectives will be reviewed at least annually as part of the Annual Management Review of Health and Safety Performance.
- This policy document will be reviewed at least on an annual basis or as necessary by senior management. This will be done in consultation with the affected personnel via their workplace representatives.
- This policy and any changes will be made available to all contracting agencies, partners and others affected by its provisions.

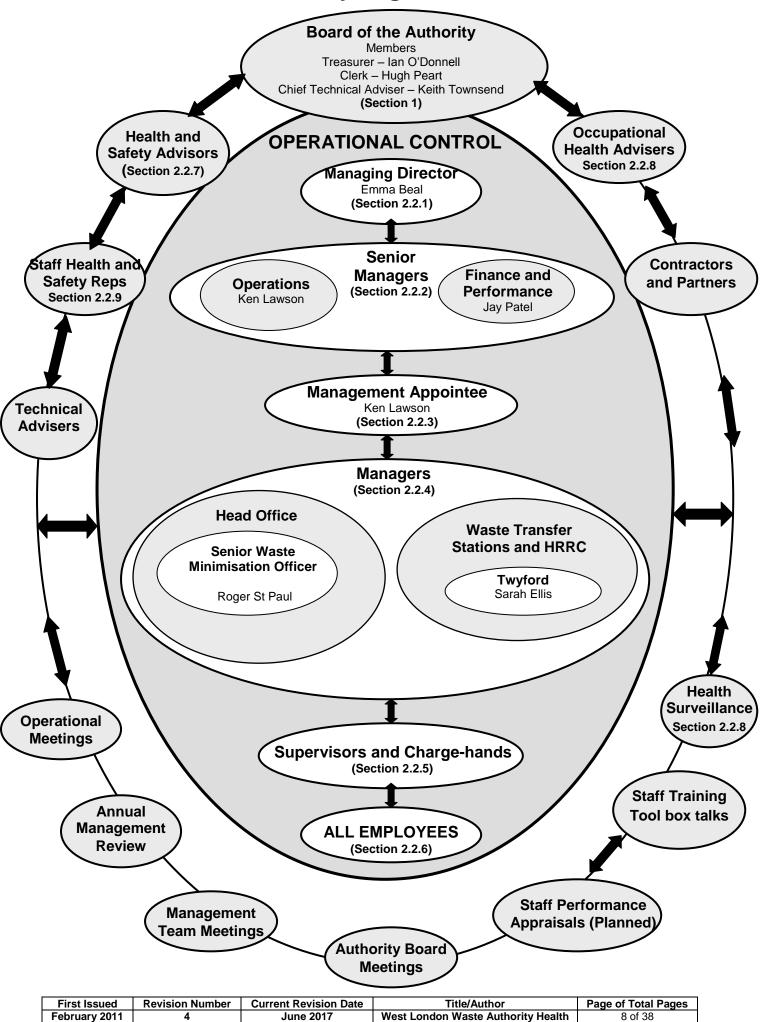
Signed:	Date:
(Director)	

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2.1. Health and Safety Organisational Structure



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2.2. Health and Safety Roles and Responsibilities

2.2.1. Managing Director

The Managing Director has overall responsibility at officer level for all health and safety matters associated with the Authority. In maintaining a general oversight of the policy the director will:-

- a. Produce and maintain a current written Health and Safety Policy statement;
- b. Bring to the notice of the Authority matters which he is unable to resolve;
- c. Appoint a member of senior management to the role of Management Appointee to act as the executive co-ordinator and ambassador for Occupational Health, Safety and Wellbeing (OHSW) within the Authority;
- d. Make the identity of the senior Management Appointee available to all persons working under the control of the organisation;
- e. Directly consult all staff twice a year to develop co-operation for a joint approach to all operational matters, including those relating to Health and Safety;
- f. Give assistance to his Senior Managers and the Management Appointee when they bring matters to his notice, which they are unable to resolve.

The Managing Director will also:

- g. Take into account the resources, necessary to maintain health and safety standards, when compiling budgetary requirements. Resources include human resources and specialised skills, organisational infrastructure, technology and financial resources;
- Define roles, allocate responsibilities and accountabilities, and delegate authorities, to facilitate an effective occupational health and safety management system (OHSMS); roles, responsibilities, accountabilities, and authorities shall be documented and communicated.

2.2.2. Senior Managers

The Managing Director, in maintaining a general oversight of the Authority's policy and without detracting from their overall responsibility, will delegate day to day responsibilities to the Senior Managers.

Such responsibilities will include implementation and application of the Authority's policy and those matters listed (g) and (h) above.

In addition they will:

- a. Ensure that new contractors, agencies and consultants are only employed after they have been thoroughly assessed for their health and safety competence;
- b. Give assistance to their managers when they bring matters to their notice, which they are unable to resolve;
- c. Bring to the attention of the Managing Director any Health and Safety matters, which they are unable to resolve.

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2.2.3. Management Appointee

The Management Appointee will be a member of senior management with specific responsibility for OHSW irrespective of other responsibilities, and with defined roles and authority for:

- a. Ensuring that the OHSW management processes described in this policy are established, implemented and maintained;
- b. Ensuring that reports on the Authority's health and safety performance are presented to the Authority on at least an annual basis for review and used as a basis for continuous improvement;
- c. Ensuring that persons in the workplace take responsibility for aspects of OHSW over which they have control, including the deployment of finite resources where necessary and adherence to the organisation's policy, arrangements and safety instructions;
- d. Ensuring that all Health and Safety documentation is retained and maintained

The Management Appointee will ensure that arrangements are made for appropriate training of staff in terms of:-

- e. Provision of training, including induction, to all new and existing employees and management training for senior and line managers in accordance with requirements identified in site safety inspections, risk assessments, accident analysis and training needs analysis. In addition, specialist training as required and refresher training as and when necessary will be arranged to ensure the Health and Safety of all staff;
- f. Requesting that Trades Unions arrange appropriate training for nominated safety representatives (if unionised) in terms of their relative duties and responsibilities in Health and safety matters:
- g. Providing appropriate training for non-unionised safety representatives to be arranged by the Authority itself;
- h. Consultation with safety representatives on safety matters at a senior level at least annually.

The Management Appointee will ensure appropriate arrangements and safe working practices are in place by means of:-

- Developing and implementing (and revising as necessary) general safety instructions, arrangements and safe operating procedures and the Authority's policy;
- j. Ensuring that site specific procedures and safe working method statements are produced at each operational site.

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The Management Appointee will ensure appropriate arrangements are made to monitor safe working practices by means of:-

- k. Analysis of accident, incident and injury report data and the compiling of statistical information;
- I. Independent auditing of all measures adopted in the management of Health and Safety;
- m. Ensuring reports and in-depth investigation of incidents and accidents and compliance with the Authority's procedures for notifying the Health and Safety Executive under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations.

The Management Appointee will also:

n. Delegate the above functions to managers as necessary to achieve compliance with their responsibilities.

2.2.4. Managers

It will be the responsibility of managers to:

- Demonstrate their commitment to the continual improvement of OHSW performance by setting a personal example and promoting a positive health and safety culture within the workforce;
- b. Stimulate interest and enthusiasm for health and safety matters amongst the staff under their control;
- c. Give assistance to members of their staff who bring to their notice health and safety matters, which they are unable to resolve;
- d. Deploy resources at their disposal to resolve health and safety matters;
- e. Ensure that all site or service specific risk assessments are undertaken, completed, and continually reviewed;
- f. Produce local safe working procedures and codes of practice, which are based on risk assessments, safety inspections, accidents and other relevant information;
- g. Monitor and review safety critical operations and the adequacy of risk assessments and best practice by means of consultation with the workforce, local safety inspections, defect reports etc;
- h. Ensure that all staff under their control (including new and transferred, permanent, temporary and agency staff) are inducted in health and safety instructions, codes of practice and the risk assessments applicable to the work they undertake;
- Periodically observe all work activities to ensure safe working procedures are being fully adhered to;
- j. Ensure that staff are aware of and comply with emergency/contingency plans;

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- Ensure workplace inspections are carried out every three months (and on a more frequent basis if the level of risk requires it) and make provision for necessary remedial action when unsatisfactory conditions are identified;
- I. Encourage safety representatives to engage in 3 monthly inspections of work areas and operational activities;
- m. Ensure that all safety related incidents and injury accidents are recorded and reported promptly and accurately to the Management Appointee at Head Office;
- Investigate accidents, incidents and contributory factors and review safe methods of working and risk assessments and implement remedial actions to prevent a recurrence;
- o. Review the effectiveness of remedial action following an accident;
- p. Ensure that all required health and safety records are maintained;
- q. Participate in and support the Authority's Health and Safety audit and inspection process;
- r. Identify staff safety training needs from Health and Safety Advisors reviews, team meetings, tool box talks and Appraisal and risk assessment processes;
- s. Consult regularly with safety representatives on safety matters;
- t. Monitor contractors' safety performance on a regular basis and ensure that they supply up-to-date risk assessments and method statements;
- Ensure that all work equipment is properly selected, used, inspected and maintained;
- v. Provide necessary levels of supervision of staff and operations under their control or responsibility for safety critical operations;
- w. Bring to the attention of the Senior Managers or Management Appointee any health and safety issues they are unable to resolve.

2.2.5. Supervisors and Charge-hands

All employees responsible for the supervision of staff are responsible for:

- a. Ensuring that all staff under their supervision are aware of, understand and comply with the Authority's health and safety policy and local instructions, operational procedures, rules and codes of practice relative to the work undertaken;
- b. Regularly observing all work activities to ensure safe working procedures are being fully adhered to;
- c. Carrying out workplace inspections every 3 months
- d. Assisting in the resolution of health and safety problems brought to their notice by staff, health and safety advisors or safety representatives;

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- e. Referring matters which they cannot satisfactorily resolve to their immediate supervisor or manager;
- f. Providing adequate supervision and instruction to their staff to enable them to work safely and advise the manager of training needs where identified.

2.2.6. All Employees

General WLWA safety instructions and site specific instructions will be issued to all employees informing them of:

- a. Their duty while at work;
- b. Their responsibility for obeying instructions;
- c. Their responsibility for reporting of accidents, incidents and dangerous occurrences;
- d. The action to be taken on discovering a fire or hearing a fire alarm;
- e. The wearing of appropriate personal protective equipment (PPE);
- f. The required training and authorisation to operate vehicles, plant and equipment;
- g. The hazards to be aware of when handling wastes, and
- h. Their responsibility for maintaining good standards of housekeeping.

Employees are required by law to comply with Section 7 and 8 of the Health and Safety at Work etc Act 1974, which states:-

It shall be the duty of every employee while at work to:

- i. Take reasonable care for the health and safety of themselves and of other persons who may be affected by their acts or omissions;
- j. Co-operate as necessary with the employer (and any person employed by the employer for the purposes of health and safety) to enable them to comply with the organisation's statutory health and safety duties.
- k. Ensure that they do not intentionally or recklessly interfere with or misuse anything provided in the interests of health, safety or welfare.

All employees are required to:

- Contact their supervisor or manager should they notice an unhealthy or dangerous situation. It is important that employees do not under any circumstances carry out operations which could cause danger to themselves or affect the safety of other persons, including members of the public;
- m. Attend safety training courses as and when arranged. No person should undertake to do any hazardous job for which they do not have the required competencies;

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- n. Make proper use of equipment and safety devices as provided;
- o. Co-operate with the investigation of accidents by Health and Safety Executive Inspectors or investigators acting for the Authority.

2.2.7. Staff Health and Safety Representatives

Appointed safety representatives will:

- a. Function in accordance with the good practice outlined in the HSE's "Consulting Workers on Health and Safety", the Approved Code of Practice for the Safety Representatives and Safety Committees Regulations 1977 (as amended) and the Health and Safety (Consultation with Employees) Regulations 1996 (as amended).
- b. Formally inspect at least every 3 months and after any notifiable accident, dangerous occurrence or disease, or where there is a substantial change in working conditions or if new information becomes available;
- c. Investigate accidents and potential hazards in the workplace
- d. Pursue employee complaints relating to the employee's health, safety or welfare at work
- e. Make representation to the Authority on matters arising out of items (c) and (d) above.
- f. Represent employees to whom they are appointed in consultation at the workplace with Inspectors of the Health and Safety Executive and of any other enforcing authority.
- g. Receive information from Inspectors in accordance with Section 28 (8) of the Health and Safety at Work Act 1974.
- h. Be permitted to take such time off with pay during working hours as shall be necessary for performing their functions under section 2 (4) of the Health and Safety at Work Act 1974.

2.2.8. Health and Safety Advisors

Appointed Health and Safety Advisers will:

- a. Provide a comprehensive telephone and e mail consultation service for managers to access expert advice, information and authoritative guidance.
- b. Provide advice and assistance in the production of the Authority's Health and Safety Policy and in its annual review.
- c. Produce written site specific risk assessments for new and existing activities, processes and equipment and review these on an at least an annual basis (or as necessary following incidents or following legal and other significant changes).
- d. Make recommendations where risk assessments would be more appropriately produced by other expert consultants.

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- e. Produce written general and site specific procedures and safe working method statements or make recommendations where these would be more appropriately produced by other expert consultants.
- f. Complete an annual audit and site inspection and a follow-up interim review at each operational site, including a full written report and an action plan to address any identified health and safety risks or non-conformities.
- g. Make recommendations for staff training as part of the risk assessment and site inspection processes.
- h. Advise, when requested, on corrective actions to prevent reoccurrence following accidents and incidents.
- i. Attend management meetings every 6 months
- j. Attend the Annual Management Review meeting.
- k. Provide advice on resolving health and safety issues indentified in Display Screen Equipment (DSE) assessments as required.
- I. Inform the Director and Management Appointee of any new or significant changes to Health and Safety Legislation that may be relevant to the Authority.

2.2.9. Occupational Health Advisors

Appointed Occupational Health Advisors will provide the following services:

a. |Health screening, including:

- Reviewing completed staff post job offer health questionnaires;
- Arranging medicals where health problems have been identified;
- Providing baseline lung function tests for staff exposed to airborne contaminants:
- Providing baseline hearing tests for staff exposed to noise
- Provide skin analysis for staff exposed to hazardous substances
- Provide eyesight, blood pressure and urinalysis tests for drivers
- Identification of D4 medicals check requirements for vehicle and mobile plant drivers
- The provision of health clearance/ fitness for work forms on completion.

b. Sickness Absence Management, comprising of:

- Assessment of employees who have been off work for a prolonged period of time, or who have had persistent intermittent absence, for their continued capability to work and/ or fitness to return to work.
- Issue of a written report of the employees' fitness to work / return to work date / recommended work restrictions.

c. Biennial Health MOTs for all staff, comprising of:

- Health questionnaire and wellbeing discussion,
- Body mass index,
- Blood pressure measurement,
- Vision screen,
- Hearing test,

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- Blood sugar;
- Cholesterol test.

d. Annual Health Surveillance, include the following:

- Audiometry for staff at risk from exposure to noise, the need for which will be determined by the Authority's Noise Risk Assessments
- Respiratory Surveillance for staff at risk of exposure to airborne contaminants, the need for which will be determined by the Authority's air quality risk assessment, including frequency and duration of exposure to determine if respiratory health surveillance for chronic obstructive pulmonary disease is required.
- **Skin Surveillance** for staff exposed to used engine oil and degreasing agents and at risk of irritant contact dermatitis or sensitisation to latex glove use.
- **e.** Ongoing Occupational Health advice and consultation to managers. Telephone and e-mail advice will be available to managers between 9am 5pm, Monday to Friday.
- **f.** Occupational Health advice is available when required on policy development.
- **g.** Refer to section 3.2 of the Authority's Arrangements for a detailed overview of how these functions will be carried out.

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WLWA HEALTH and SAFETY POLICY SECTION 3: **ARRANGEMENTS**

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3.1 Appointment of Health and Safety Assistance

Regulation 7 of the "Management of Health and Safety at Work Regulations 1999" (MHSWR) requires that the employer appoints one or more competent persons to assist in complying with the relevant statutory provisions.

The London Borough of Hounslow (LBH) Occupational Health, Safety and Wellbeing Team (OHSW) has been appointed by the Authority to provide Health and Safety Assistance and to act as the named professional Health and Safety Advisers to the Authority.

The Authority is permitted to reference the LBH OHSW Team name in any correspondence relating to health and safety e.g. tenders, policies, HSE correspondence etc.

Their appointment is limited to providing guidance in fulfilling the statutory criteria and performing the functions outlined in section 2.2.8 to assist the Authority in meeting its associated legal duties. This is strictly an advisory role and does not involve any operational or executive authority.

In addition the functions outlined in section 2.2.8 and by arrangement, the LBH OHSW Team can also perform additional functions, which are outside of the core contract on a daily call-off basis. Such functions may include for example, producing guidance, accident investigation and liaison with inspectorates such as the HSE. Senior management will determine the need to employ such services on a case by case basis.

3.2 Health Surveillance

Regulation 6 of MHSWR requires that employees undergo health surveillance where appropriate.

The Authority has appointed the LBH Occupational Health Team to provide health surveillance to its employees as part of an overall occupational health service as outlined in section 2.2.9. These functions will be carried out as follows:

3.2.1 Post job offer health screening

A pre-employment health questionnaire will be completed for all new employees. Medicals are not routinely required unless a health problem has been identified on the questionnaire.

Process:

Questionnaires will be returned directly to the Occupational Health Department for screening by an Occupational Health Adviser.

If an employee requires a further medical assessment an appointment will be issued for them to attend the Occupational Health department at the Civic Centre, Hounslow.

On completion of the assessment a health clearance/ fitness for work form will be sent to the line manager.

3.2.2 Sickness Absence Management

Employees who are off work for a prolonged period of time, or who have persistent intermittent absence will be referred to the Occupational Health service in order to assess their continued capability to work and/ or fitness to return to

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work. This will include looking at any adjustments to enable an earlier return to work.

Process:

On receipt of a written referral, the Occupational Health team will send out an appointment letter to the employee, which will be copied to their manager. If further medical information is required from the employee's GP or hospital specialist, consent will be obtained from the employee to request this. Following assessment, a written report of the employees' fitness to work / return to work date / work restrictions will be issued to the manager.

3.2.3 Driver Health Assessments

Employees who drive plant vehicles on site will be given driver health assessments on an annual basis. The assessment will comprise of a health questionnaire, blood pressure measurement, vision screen, and a urine test.

Although a Group 2 license is not required to drive vehicles on site, as good practice the Authority will adhere to the DVLA medical standards applicable to those who drive mobile plant vehicles. This will require drivers to complete a D4 medical form through their GP at these intervals:

- on commencement of the post (unless drivers have already completed one in their previous job and can provide evidence)
- five yearly from aged 45yrs 65yrs
- annually from the age of 65

Process:

a. Current employees:

An Occupational Health Adviser will come on site to conduct the health assessments for existing drivers on an annual basis. A recall database will be maintained by the LBH Occupational Health Team and employees recalled for repeat assessment at the appropriate time intervals. If a number of the repeat assessments are due at the same time interval, they will be done on site; otherwise the employee will attend the Occupational Health Department at the Civic Centre, Hounslow.

Notification of continued fitness to drive, including the need for repeat D4 medical form completion will be forwarded to the site manager.

b. New employees:

Following receipt of the pre-employment health questionnaire, new employees will be issued with an appointment to attend the Occupational Health Department for assessment. Notification of their fitness to drive plant vehicles will be forwarded to the site manager. Their details will be added to the Occupational Health database and recalled for repeat assessment at the appropriate time interval.

3.2.4 Health Surveillance

a. Audiometry:

The Control of Noise at work Regulations requires the employer to provide health surveillance (hearing test) where the risk assessment indicates a risk from exposure to noise.

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The Regulation guidance states 'there is strong evidence to show that regular exposure above the upper exposure action values can pose a risk to health. Where exposure is between the lower and upper exposure action levels, the employer should provide health surveillance if you find out that an individual may be sensitive to noise' e.g. family history, previous hearing tests, showing signs of hearing loss.

A review of the Authority's Noise Risk Assessment will be used to determine which staff should undergo audiometric testing.

Process:

Employees will attend the Occupational Health Department at the Civic Centre for their hearing test. All results will be entered on to a recall database. Each employee will be informed of their results in writing and if any hearing deficit is identified, they will be referred to their GP for further assessment.

A report on the group results of the audiometric screening will be forwarded to the site manager.

All new employees will attend Occupational Health for a baseline audiometric test on commencement in post.

b. Respiratory Surveillance

Employees working in the plant maintenance and tipping areas are intermittently exposed to airborne chemical and dust contaminants, including welding fumes, vehicle exhaust fumes and dust and fibres from tipping operations. Exhaust ventilation is used and PPE provided.

Process:

Employees will attend the Occupational Health Department at the Civic Centre for an annual lung function test. All results will be entered on to a recall database. Each employee will be informed of their results in writing and if any deterioration is identified, they will be referred to their GP for further assessment.

A report on the group results of the respiratory screening will be forwarded to the site manager.

All new employees will attend Occupational Health for a baseline lung function test on commencement in post.

c. Skin Surveillance

Employees involved in plant maintenance may be exposed to used engine oil and degreasing agents, and are also at risk from irritant contact dermatitis or sensitisation secondary to latex glove use, therefore annual skin surveillance will be provided.

Process:

A baseline questionnaire should be completed on commencement in post, then annually thereafter. The Occupational Health Team will send the annual skin surveillance questionnaires with pre-paid envelopes to the site managers for distribution to employees, who will complete the form and return direct to Occupational Health.

If any problems are highlighted on the questionnaire, an appointment will be made for the employee to attend Occupational Health for further assessment.

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All information will be entered on a recall database and an annual report of group results will be forwarded to the site manager.

3.2.5 Vaccinations

a. Hepatitis B:

There is no direct handling of waste; at each site waste is moved either by a grabber or by sweeping and gloves are worn at all times. The risk of sustaining a needle stick injury is very low indeed, therefore Hepatitis B vaccinations are not recommended. There should however, be clear guidance available for employees on what action to take in the rare event of a needle stick injury

b. Tetanus:

Tetanus vaccinations are administered as part of the childhood immunisation programme and in the UK most people have received all their vaccines by the age of 15yrs. Routine 10 yearly tetanus boosters are no longer recommended. Should an employee sustain a tetanus prone injury at work, their GP or treating A&E doctor will assess the requirement for a booster dose of vaccine to cover the risk from the injury.

However, information on vaccinations are part of the pre-employment and ongoing surveillance questionnaires, and any UK or foreign staff that are identified as without basic immunisation will be referred to their GP.

3.2.6 Ongoing OH advice and consultation to managers

Telephone advice will be available to managers between 9am – 5pm, Monday to Friday.

3.2.7 Policy Development

The LBH Occupational Health Team will be available when required to give advice on policy development.

3.3 Drivers with Notifiable Medical Conditions and Disabilities

Refer to the Authority's Driving at Work Policy.

3.4 Risk Assessment

The Health and Safety at Work Act 1974 and the Management of Health and Safety at Work Regulations 1999 require an assessment of the risks to the health and safety of employees and to anyone else who may be affected by the operations of the business. Employers having five or more employees are required by law to record the significant findings of the assessments.

Regulation 4 requires that where an employer implements any preventative and protective measures he shall do so on the basis of the schedule below.

- a. Avoid risks;
- b. Evaluate the risks which cannot be avoided;
- c. Combat the risks at source;
- d. Adapt the work to the individual (workplace design, choice of equipment, choice of production and working methods with a view to alleviating monotony and predetermined work-rates to reduce effects on health);
- e. Adapt to technical progress;

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- f. Replace the dangerous by the non dangerous or less dangerous;
- g. Develop a coherent overall prevention policy;
- h. Give collective protective measures priority over individual measures;
- i. Give appropriate instructions to employees.

Risk assessments will be carried out and recorded in the following ways:

- All general activities carried out by Authority Staff will be risk assessed by the Authority's appointed Health and Safety Advisers using an agreed format (attached in appendices)
- b. Where necessary, expert external consultants will be commissioned to carry out surveys, audits and risk assessments in specialist areas, including:
 - Fire Risk Assessment
 - Asbestos
 - Legionella and water hygiene
 - Noise
 - Air quality monitoring
- c. Manufacturer's / supplier's risk assessments will be adopted for hired specialist mechanical equipment.
- d. Contractors will be required to supply their own risk assessments for their activities and equipment.

3.5 Fire / Emergency Procedures

Regulation 8 of MHSWR requires that employers establish appropriate procedures to be followed in the event of serious and imminent danger. This is generally taken to mean procedures in case of fire.

This includes procedures for making contact with any necessary external services in accordance with regulation 9 of MHSWR, particularly as regards first-aid, emergency medical care and rescue work.

All premises owned, leased, rented or occupied by the Authority for the purposes of business will comply with the Regulatory Reform (Fire Safety Order) 2005. A fire risk assessment will be undertaken for each place of work by a competent person. Adequate warning devices, signs, information, fire extinguishers, fire exits, escape routes and fire drill procedures will be in place as detailed in the fire risk assessments.

All employees of the Authority have a duty to raise the alarm in the event of fire and to implement their local site specific fire safety procedure.

All workers have a duty to conduct their operations in such a way as to minimise the risk of fire. This involves observing no smoking areas, keeping combustible materials separate from sources of ignition and the reporting of defects.

All works vehicles will be equipped with fire extinguishers. A competent person will annually check all vehicle and office extinguishers. Defective equipment will be immediately replaced.

The misuse of, or wilful damage to, or obstruction of fire exits or fire extinguishers will result in disciplinary action.

It is the responsibility of the Managers and Supervisors at Operational Sites named in the Policy and Organisation Section to ensure that fire procedures are

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communicated onsite (e.g. by posting a copy of the fire procedures notice in the weighbridge office or rest area and verbally during induction etc).

Fire equipment, systems and procedures at Head Office are managed and maintained by the LB Hounslow Facilities Team at the Civic Centre, Hounslow.

The fire assembly points are:

Head Office Lampton Park

Twyford Site At the red gate at the entry to the site before the

vehicle checkpoint

3.6 Safety Information for Employees

Regulation 10 of MHSWR requires that employees are provided with information regarding health and safety risks and any measures to be taken to reduce those risks.

Safety information for employees is provided in the form of:

- Risk assessments;
- Safe Working Method Statements;
- Specific policies and procedures attached as appendices to this policy
- A Health and Safety Booklet for staff at operational sites (also attached).

Operational staff receive a copy of the Health and Safety Booklet when they undergo their induction training or when the booklet is revised. Records of issue are kept with personnel files.

The statutory notice 'Health and Safety Law – What You Should Know' poster is displayed at Head Office and on specific Health and Safety notice boards in both the Weighbridge and rest/mess areas of the, Twyford operational site.

3.7 Consultation with Employees

A clear process of consultation with all members of the workforce is identified in the job related health and safety responsibilities. Regular meetings between the Director, Managers and Staff will communicate concerns of the workforce to the senior management team. The senior management team will consult the workforce through the chain of responsibility and by direct consultation with members as specific issues arise. Employees should never hesitate to draw attention to any aspect of health and safety that concerns them. If staff are reluctant to raise issues with their manager, because they are concerned that it will lead to confrontation or reprisals, the Authority has a whistle blowing policy that allows staff to raise concerns with senior management in strict confidence.

3.8 Communication and Induction Training

The Operational management team will ensure every employee is made aware of the Health and Safety Policy and Procedures through a company 'Induction Training Programme'. Each employee will be made aware of and assisted in fulfilling their health and safety responsibilities by their immediate line manager through consultation.

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The Operational Management Team will communicate changes to the Health and Safety Policy and Procedures to all employees through the chain of responsibility outlined above or through direct briefings.

3.9 Employee Health and Safety Induction

Where new members of staff are employed or existing members significantly change jobs they will be provided with training and information to ensure they undertake their roles safely.

The Induction Training will cover all aspects of safety management and a record will be kept of their induction. Key aspects of Health and Safety Induction will be undertaken **before** work starts by their line Manager.

For each new employee based at an operational site, an operational Health and Safety Booklet will be provided to them as part of their induction.

3.10 Staff Training

Employees of the Authority must be adequately trained and informed to perform their job effectively, safely and efficiently. The Authority is committed to providing the highest quality service to their customers and this is best achieved through a trained, informed and motivated work force.

To achieve this, the Authority will ensure employees are trained in current safe working practices in line with their job requirements. Individual training requirements will be reviewed annually and after promotion or re-deployment. Employee training records will be updated and maintained in the company's Head Office.

Refresher training and job specific training will be scheduled according to good practice and changes in working activities.

Training will be at the Authority's expense and where practicable undertaken in normal working hours.

3.11 Safety of Young People

Young workers under the age of 18 will be individually assessed if necessary. In most cases, existing risk assessments will be satisfactory for all workers. An appropriate level of supervision will be provided to young workers by a designated mentor. The assessment and level of supervision will be reviewed as part of the induction process.

Under-16 year olds and work experience students MUST be authorised by the Director and supervised at all times by a designated supervisor.

3.12 Control of Hazardous Substances

It is the policy of the Authority to comply with the Control of Substances Hazardous to Health Regulations and the Hazardous Waste Regulations where they apply.

A risk assessment will be conducted for all work involving exposure to hazardous substances. The assessment will be based on manufacturers' and suppliers' health and safety guidance and the Authority's own knowledge of the work

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process. The assessment will be in writing and a copy held at the relevant operational site.

COSHH assessments will be held as close to the hazardous substance as practicable. All workers who will come into contact with hazardous substances will be adequately trained and informed of the health and safety issues relating to that type of work.

Assessments will be monitored and reviewed periodically.

Managers must inform the Health and Safety Adviser of any new substances requiring assessment before use.

3.12.1 Flammable Liquids and Explosive Atmospheres

Flammable liquids must only be stored in an approved metal or plastic container. This must be kept secure when not in use. Authorised key holders must be identified.

Stores MUST be adequately ventilated and clearly signed. All storage areas are subject to an annually reviewed Risk Assessment.

3.12.2 Biological Hazards

Some naturally occurring substances may present a hazard and there is a duty to assess the risk of contamination and put in place such controls as are applicable. Hazard examples include plant saps (Hogweed, Staghorn Sumac), Animal Faeces, Leptospirosis, Wood dusts. Attention must be paid to preventing these substances being transferred via clothing or tools to employee's homes, vehicles or other premises.

3.12.3 Needles and other contaminated items

Increasingly our works brings us into contact with a variety of potentially harmful items left by others onsite. In the case of Needles/Sharps, Condoms, Disposable Nappies or other potentially contaminated items there is a risk of cross infection to those exposed to them. Managers MUST assess the risk of such items occurring onsite and take appropriate action and make staff aware.

Pick sticks and sharps containers are provided on operational sites to avoid handling and ensure safe disposal.

In the event of needle stick or other potentially contaminated injury, encourage the wound to bleed (do not suck), wash wound with soapy water, dry and cover the wound, report the incident to your manager and seek medical advice.

In the case of Condoms, Sanitary towels, Disposable nappies etc; avoid handling the items and if possible quarantine the area. If the items have to be moved wear disposable gloves to handle the items or a pick stick and dispose in a sealed polythene bag. If accidental contamination occurs wash the contaminated area with plenty of soap and water.

3.13 Personal Hygiene

The nature of the Authority's operations requires employees to work in dirty and dusty conditions, which exposes them to substances potentially harmful to health.

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Appropriate welfare facilities are available at all sites and these should be used as required and before any meal or refreshment break.

In locations where welfare facilities are not immediately to hand, alternative facilities must be available such as waterless skin cleanser, hand wipes or similar.

3.14 Manual Handling Operations

It is the policy of the Authority to comply with the Manual Handling Operations Regulations 1992.

Wherever possible, equipment is provided to avoid or reduce the need for manual handling.

Where manual handling cannot be avoided, assessments taking into account the task, the load, the working environment, the capability of the individual concerned and other factors such as PPE will be undertaken by the Authority's appointed health and safety advisors.

Suitable measures to control the risks will be implemented e.g. Avoid handling, reduce load size, mechanical assistance, ergonomic work principles, assisted lifting and all other possible steps will be taken to reduce the risk of injury to the lowest level possible.

Management will ensure individual employees are adequately trained to make their own dynamic manual handling assessment. All employees will receive Manual Handling Training from an approved trainer (e.g. NEBOSH, LANTRA) within 2 months of starting work for the company.

Individual's may refuse to undertake a lifting task if they feel it is unsafe to do so. It is the management's responsibility to support the individual decision and implement additional controls as required.

The Authority has a Manual Handling Policy and Assessment procedure, which should be read in conjunction with this policy.

3.15 Workplace Inspections

It is the policy of the Authority to comply with the Workplace (Health, Safety and Welfare) Regulations.

The Operational Management Team will conduct regular inspections of the workplace.

In addition inspections will be conducted in the relevant areas whenever there are significant changes in the nature and / or scale of our operations.

Workplace inspections will also provide an opportunity to review the continuing effectiveness of the policy and to identify areas where revision of the policy may be necessary.

3.16 Access and Egress

A safe means of access to and from all workplaces must be maintained at all times.

In offices, workshops, restricted work sites and civic amenity locations all doorways, walkways and access routes must be kept clear of obstructions.

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Worksites must be managed to minimise trip hazards for workers and the public.

Public paths, open spaces and highways must be left clear of debris.

Work activities, stock piles and stores MUST not endanger the public at any time.

3.17 Visitors

Visitors to offices and operational sites must be included in the emergency procedures. The Authority has a 'Duty of Care' to ensure the health and safety of those people invited or otherwise who enter premises controlled by the Authority.

3.17.1 Offices

The individual being visited has responsibility for the visitor's health and safety during the visit. Visitors should be required to sign in on arrival and sign out on departure.

Visitors to head office should not be unaccompanied, in compliance with the landlord's, London Borough of Hounslow, security arrangements.

Visitors to offices at operational site should not be allowed to leave the office areas and enter operational areas unaccompanied.

3.17.2 Operational Areas

Where a visitor enters an operational area at one of the Authority's Waste Transfer and Civic Amenity sites, they must be accompanied at all times by a representative of the Authority.

The visitor must be briefed by the Site Manager or an operational supervisor of the hazards, risks and emergency action plan.

Any work likely to endanger the visitor must stop or the visitor excluded until it is safe to enter the work site.

The visitor must be provided with a high visibility waistcoat as a minimum PPE requirement

The Site Manager retains responsibility for the visitor's health and safety whilst they are on the work site.

3.18 Control of Contractors

All contractors, subcontractors, agency staff and consultants will be issued with this policy and are subject to it.

Where contractors or other persons are present on Authority premises they will be informed of any known hazards and made aware of emergency action plans.

Contractors will appoint an onsite safety representative.

3.18.1 Information required by the client

Safety Method Statement

Where appropriate contractors may be required to submit method statements as part of their safe system of work and will typically contain:

the safety element of an overall work method statement

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- a task safety analysis
- the significant findings of the risk assessment

The purpose of a method statement is to enable the Authority to monitor contractor competency and health and safety performance and contract workers to carry out their tasks in a safe manner, understand the hazards and risks associated with the work and comply with the controls in place to reduce risk.

A method statement should contain the following information:

- a description of the work to be carried out
- the location of the work
- the timetable of the works
- the safe system of work to be adopted
- the safe access and egress routes for personnel, plant and materials
- any mechanical plant, access plant and lifting plant that will be used, with details of where it will be sited, how it will be used and copies of test certification where applicable
- the name of the competent person responsible for supervising the work and copies of that person's competency certification
- the names of the persons carrying out the work, their level of competency and copies of their competency certification
- the health and safety risks associated with the work
- the steps to be taken to remove or control the risks identified in the above step
- the effect of the proposed work on the client's business continuity and the steps that will be taken to minimise the disruption
- the actions to be taken in the event of an emergency situation arising
- the names and telephone numbers of the persons that are to be contacted in the case of an emergency
- risk assessment for the task and equipment used as appropriate.

Health and Safety Policy Document

A copy of the contractor's own safety policy will also be requested as part of the Authority's contractor competency checks.

3.18.2 Information required by the contractor

The Authority will provide site details as listed below:

- location of the work and site boundaries
- condition of the workplace
- hazardous substances present
- ground conditions
- location of mains electricity and other services
- current work practices and procedures
- current high risk activities (e.g. storage of highly flammable liquids)
- current emergency procedures and arrangements
- specified fire arrangements and procedures
- existing work rules
- activities of other contractors which may affect the work
- environmental considerations
- site set up
- security procedures and the requirements relating to any statutory notifications of work (such as the reporting of accidents)

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For commercial drivers, the relevant health and Safety information will be contained in the site specific driver's safety rule leaflet.

3.18.3 Evaluation of the contractor's safety arrangements

Site Managers will be responsible for evaluating any potential contractor's competency and their safety arrangements using the contractor evaluation procedure, pre-commencement or pre-tender documentation.

3.19 Construction (Design and Management) Regulations (CDM)

Where 'construction work' is arranged by the Authority, it will comply fully with the requirements of the Construction (Design and Management) Regulations (CDM) 2007 in its role as client.

Reference will be made where applicable to the 'Managing Health and Safety in Construction ACOP' (L144).

In addition to the Authority's health and safety procedures, full cooperation will be given to the 'Designer', 'CDM Coordinator' and 'Principal Contractor' in the pretender/design stages and during construction phases in providing accurate health and safety information.

3.20 Work Equipment (PUWER)

It is the policy of Authority to comply with the Provision and Use of Work Equipment Regulations and the Lifting Operations and Lifting Equipment Regulations.

The Authority will ensure that all equipment used in the workplace is safe and suitable for the purpose for which it is used. All workers will be provided with adequate information and training to enable them to use work equipment safely. Only those persons with adequate training will be authorised to use the equipment and all work equipment will be maintained in good working order and repair.

All employees are responsible for ensuring equipment issued to them is inspected and maintained in accordance with the manufacturer's handbook, industry best practice or management recommendations. The inspection and maintenance of this equipment will be logged and records will be monitored to ensure compliance.

All work equipment will be clearly marked with health and safety warnings where appropriate.

3.20.1 Defective Equipment

Equipment will be withdrawn from use if it is defective and repaired or replaced as soon as practicable. It is the individual employee's responsibility to ensure that management is informed of equipment defects and the equipment is withdrawn from service if it is unsafe.

A replacement policy will operate to ensure equipment is maintained to the highest standard and meets current good practice. For this policy to be effective managers will be responsible for the correct maintenance and inspection of that equipment.

3.21 Control of Noise at Work

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The Authority is committed to protecting the hearing of its employees and those affected by its operations. To that end where employees are exposed to machinery and operations with a noise output that exceeds 80dB(A) a noise risk assessment will be completed and adequate hearing protection supplied to staff affected by it. (Noise INDG363)

Health surveillance for individual employees will be provided in accordance with the schedule described in 3.2.

All employees must wear their ear protection where directed to do so and when working in noisy environments that exceed 85dB(A).

All machinery that exceeds 85 dB(A) must carry the Mandatory Blue Sticker indicating ear defence must be worn.

Where the public or other people are at risk from noise caused by the Authority's operations an effective 'Ear Protection Zone' (EPZ) must be enforced with signs and/or barriers.

3.22 Personal Protective Equipment

It is the policy of the Authority to comply with the Personal Protective Equipment at Work Regulations 1992.

Where employees are exposed to risks that cannot be controlled by other means they will be provided with suitable, properly fitting and effective personal protective equipment.

This equipment will meet all current safety standards and will reflect the risk assessment for the tasks undertaken. Adequate training and information in the use of that PPE must be available at the time of issue.

Employees will maintain all personal protective equipment provided by the Authority in good working order.

Defects to any personal protective equipment will be reported to the management and withdrawn from service.

Misuse, negligence, wilful damage or loss of personal protective equipment issued to employees may result in disciplinary action. In such cases PPE will be replaced or repaired at cost to the employee.

Where personal protective equipment is issued or identified in the risk assessment employees must use it. Failure to do so may result in injury and will result in disciplinary action. Site managers, supervisors or company safety representatives may exclude persons from the work site where appropriate PPE is not worn.

PPE issue and condition is subject to periodic recorded checks.

3.23 Waste Disposal

Offices, Work Shops, Yards and Work Sites will be kept tidy and must not block emergency access or escape routes.

Potentially hazardous or flammable waste must be separated from other waste materials.

All waste materials must be disposed of in accordance with The Environmental Protection Act, the Control of Substances Hazardous to Health Regulations and the Hazardous Waste Regulations.

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3.24 Smoking

The Authority operates a no smoking policy in all buildings, vehicles, external operational areas and public spaces. Smokers are required by law to refrain from smoking wherever non-smokers may be affected and within any enclosed spaces.

Smoking is strictly prohibited in all vehicles and within 15 metres of any areas where fuel or combustibles are stored or disposed of.

Appropriate signage will be clearly displayed within all vehicles, at the entrances to and within Authority buildings.

3.25 Accident Reporting and Investigation

It is the policy of the Authority to record all accidents and comply with the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR)1995

An accident is ANY unplanned event and includes 'near miss' incidents where no injury has resulted, or where there is no damage to property or equipment whether owned by the company or others.

BY RECORDING NON INJURY INCIDENTS YOU COULD PREVENT SOMEONE BECOMING INJURED IN THE FUTURE.

3.25.1 Incidents and Injuries

All injuries and incidents occurring at work will be recorded on the Authority's Accident and Incident Report Form available from the local manager. The details contained within the accident report are Confidential and will be held securely at the relevant site and a copy held, regardless of the site, at Head Office.

It is the responsibility of the local manager to carry out an initial investigation of all accidents / incidents and implement and necessary remedial actions to help prevent a reoccurrence. Details of this should be recorded on the reverse of the accident / incident report form.

The Management Appointee will review each accident or incident as soon as practicable after they are reported and recommend any additional or improved action where applicable.

3.25.2 Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) 1995 (as amended 2012)

Any notifiable injury, disease or dangerous occurrence that falls within the scope of RIDDOR 95 must be reported to Head Office and the appointed Health and Safety Adviser immediately.

The relevant site or Head Office manager will complete Form F2508A online via the RIDDOR Web Site (www.riddor.gov.uk) ideally immediately or otherwise within 15 days of the injury, dangerous occurrence or employee incapacity.

All fatalities must be reported immediately.

Notification may be made by telephone 0845 3009923 in the case of fatalities, or where a member of the public is injured and requires hospital or medical attention.

3.25.3 Accident Investigation

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The Authority sees accident investigation as a valuable tool in the prevention of future accidents. If an accident is reported to the HSE an internal investigation procedure will be implemented within 24 hours.

The procedure will be:

- a. The accident is reported to the Line Manager, Director and Health and Safety Safety Adviser immediately.
- b. A Senior Manager or a delegated officer will investigate the accident using the HSE Investigating accidents and incidents (INDG245) methodology.
- c. The accident / incident report form will be completed if not done so already.
- d. Written eyewitness statements will be gathered.
- e. All team members involved will be interviewed and interview minutes recorded as appropriate.
- f. All job sheets, risk assessments, inspection and maintenance logs will be collected and copied.
- g. All eyewitness accounts will be collected as near to the time of the accident as is reasonably practicable. Any person required to give an official statement has the right to have a legal or works representative present at the Authority's expense.
- h. The investigating officer will compile an initial report within 3 working days of the accident occurring.
- The completed report will then be submitted to and analysed by senior management team and recommendations made for improvements to safety procedures where required. A copy of the report will be available to those affected for comment.

Assistance in carrying out the investigation will be provided by the Health and Safety Adviser if required.

Where necessary, all reports will be submitted to the Authority lawyers and / or insurance broker who will advise on liability, proceedings and quantum of damages. If employees are found to have failed to follow health and Safety requirements and procedures further action may be taken under the Authority's Disciplinary Procedure

A follow up report will be completed after a reasonable period of time examining the effectiveness of any new measures adopted.

3.26 First Aid

Only individuals with current First Aid at Work (FAW) or Emergency First Aid at Work (EFAW) qualifications are permitted by the Authority to perform first aid.

Individuals with the necessary qualifications will not put themselves in unnecessary danger in order to administer first aid.

First aid kits will be identified as part of the site emergency action plan and everyone onsite will know the location of the first aid kits, risk assessment and emergency information.

First aid stations are located in all vehicles/premises. All first aid stations will be clearly marked and easily accessible by all employees during all working hours.

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Each operational site will have the capacity to have at least one First Aid at Work trained person on duty at all times during normal operating hours to take charge in the event of illness or injury. The FAW first aider should be supported by sufficient fellow FAW or EFAW trained colleagues.

3.26.1 First Aid Kits

All company vehicles must carry a First Aid Kit that is adequate for the job undertaken and the number of team members. First aid kits should be as described in the First Aid Regulations.

The Manager/ first aider must ensure that First Aid kits are replenished immediately after use. (Refills on each site)

Local site managers will ensure that each kit is checked and recorded as part of the routine 3 monthly site inspections. The contents will be renewed before expiry dates.

All those driving their private vehicles on Authority business must carry a first aid kit.

There is no mandatory list of contents for first-aid boxes and the HSE does not 'approve' or endorse particular products, but does give recommendations for low risk workplaces. However, because the Authority's operations carry a higher than normal risk, first aid kits will comply with British Standard BS 8599 as a demonstration of good practice and the contents shall adhere to the following contents and guiding principles:

- **a. Gloves.** A higher number of Nitrile gloves selected in line with NHS and St John Ambulance guidelines.
- b. Plasters and Wipes. A larger quantity of plasters and wipes.
- **c. Burns Dressings.** Modern wet gel burns dressings are universally used by accident and emergency services. Given that there is a risk for burns, especially at operational sites, this item is included in kits together with a conforming bandage to secure the dressing, where appropriate.
- **d.** Resuscitation Device. Mouth-to-mouth resuscitation can present an infection risk to the patient or first aider. Employers have a duty of care to protect their employees from such a risk and therefore a protective face mask is provided.
- **e. Finger Dressings**. A large proportion of injuries involve fingers and plasters are not always sufficient to offer treatment for such injuries, and therefore finger sized dressings are included in the kits.
- f. Adhesive Tape. Adhesive tape is added to conveniently and safely secure dressings and bandages, without the need to use safety pins. Safety pins are retained as an option, particularly for triangular bandages used as slings.
- g. Triangular Bandages. The number of triangular bandages has been reduced reflecting the current first aid protocols that no longer indicate their use for immobilisation of lower limb injuries.
- h. Foil Survival Blanket. Clinical shock presents a risk to life. The treatment includes keeping the casualty warm, the addition of foil survival blankets allows first aiders to treat clinical shock, where in the past they would be reliant on blankets being available.
- i. Scissors/Shears. Where injuries occur through clothing or shoes, protocol dictates that the clothing should be cut away around the wound site to allow it to be covered with a dressing.

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First aid kits will not contain medication of any kind and first aiders are not qualified or permitted to give or prescribe any kind of medication, even over the counter medication.

3.27 Display Screens and Workstations

The Authority will comply with the Health and Safety (Display Screens Equipment) Regulations where applicable.

Refer to the Authority's Display Screen Equipment Policy and Procedure.

3.28 Lone Working

Refer to the Authority's Lone Working Policy and Procedure.

3.29 Electrical Equipment

All fixed electrical installations shall be subject to 5 yearly inspection and testing and all portable electrical equipment shall be subject to annual visual inspection and testing by a competent person. Site Managers and Head Office Managers shall ensure these inspections are carried out and recorded where necessary.

3.29.1 Extension Cables and Outdoor Use

Extension cables shall only be used as a temporary connection and incorporate an earth monitoring device.

Where the use of an extension lead becomes frequent or permanent, this must be reported to the local manger so that arrangements can be made to install further sockets or implement other control measures to avoid the use of the extension lead.

Extension leads used outside in potentially damp or wet conditions must be connected to the mains supply via an 110v transformer which is connected as close as possible to the main supply.

Outdoor extensions and appliances must be rated to IP65 and be plugged into a Residual Current Device (RCD) that has been tested before use.

3.30 Working at Height

Where ever possible the 'Risk of Falling' shall be eliminated and where this is not possible it shall be reduced. Where work may need to be carried out at **height a risk assessment** must be undertaken with the following hierarchy of risk considered and appropriate controls applied where practicable:

3.30.1 Eliminate Falling

Use long handled tools to reach inaccessible areas. Adequate training and risk assessment must be in place for the safe operation of any tools used in this work environment. Particular attention must be paid to falling objects, stable footing and manual handling. The choice of access method will need to consider factors such as: duration and nature of the task, cost effectiveness, site suitability and training requirements.

3.30.2 Permanent Fixed Access

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Where access is routinely required and it is practicable e.g. vehicle sheeting, consideration must be given to providing adequate walk ways or gantries easily accessible and constructed with adequate edge protection, i.e. kick boards and hand rails.

3.30.3 Temporary Working Platforms (Including Step Ladders and airline steps)

These include working platforms, trestles, scaffolding, cradles and mobile platforms.

Scaffold and platforms must be erected and periodically inspected by a competent person.

Any scaffold, step ladders or trestle platform must not be used as a Work Place unless proper edge protection is provided.

Do not use the top platform of a step ladder unless it is designed with special handles.

Do not work from ladders unless you can hold onto the ladder and it is safe to do so. Do not overreach and ensure the ladder is correctly positioned and restrained. Where this cannot be achieved reconsider your access method or supplement with work restraint or fall arrest system.

3.30.4 Ladders and Step Ups

Refer to INDG402 Employers Guide To Ladders. ALL ladders, step ladders, step ups must be uniquely marked and a register maintained indicating their location and their periodic inspection.

Ladders must be inspected prior to use and given a thorough inspection by a designated and competent person authorised to do so every 3, 6 or 12 months as indicated below.

3.30.5 Inspection Interval:

This is assigned by the inspector based on the known use of the ladder and its condition.

- **a. 3 months**: Heavily or Frequently used ladders are subject to daily use or ladders beginning to show significant wear which is likely to deteriorate significantly within 6 months.
- **b. 6 months**: Moderate or Occasionally used ladders are subject to weekly use or ladders beginning to show signs of wear which is likely to deteriorate significantly within 12 months.
- **c. 1 Year**: Infrequently used ladders subject to monthly use which are in good condition.

All employees using lean to, extendable and step ladders must have received adequate training and be authorised to do so.

3.30.6 Personal Suspension System / Work Positioning Techniques

These systems and techniques are only available to those adequately trained and certificated to use them. These systems shall only be considered when other forms of access are not practicable. Where possible these systems may be employed with other access methods to provide a hybrid system. Where two or more systems are to be employed, the employee must be competent in the use of them all.

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3.30.7 Fall Arrest

This is at the very bottom of the risk hierarchy and should not be used unless none of the above are practicable. Where it is used, careful consideration must be given to the level of risk, nature and distance of unobstructed fall, task being undertaken, rescue access and level of individual competency. Where this system is used the individual must be adequately trained.

3.30.8 Rescue From Height

In the case of MEWPs and any Personal Suspension, Work Positioning or fall arrest situation a competent person will ensure that planning for emergencies and rescue are in place before work at height commences. This will include the recorded designation of a competent designated rescuer, a rescue plan and suitable equipment. In the case of a MEWP this will include the capability to bring the MEWP cradle down should the power fail from ground level. In all cases rescue must be able to commence without delay.

3.31 Lifting Operations and Lifting Equipment (LOLER 98)

The Authority will comply with the Lifting Operations and Lifting Equipment Regulations 1998. All climbing or lifting operations will be risk assessed and where possible the risk from falling eliminated.

3.31.1 Passenger Lifting and lowering Equipment

All equipment used to lift people will be individually marked and thoroughly inspected by a competent person every six months. The local manager will keep a record of this inspection in their Health and Safety Folder on site. Further to a thorough inspection individuals will maintain a daily visual inspection.

3.31.2 Goods Lifting Equipment and Operations

All equipment will be individually marked and thoroughly inspected by a competent person every twelve months (with the exception of lifting tackle, which will be inspected every 6 months).

Any lifting operations will be carefully planned and risk assessed by a competent person with appropriate experience in that operation. Only those trained and competent in lifting operations will undertake lifting and lowering operations. At least one person on site must be adequately experienced in undertaking the planned operation.

3.31.3 Mobile Elevated Work Platforms (MEWP)

MEWPs should be used where reasonably practicable taking into account, cost, availability and site accessibility. All MEWPs whether owned or hired by the Authority must be 'fit for the purpose' as defined under the Provision and Use of Work Equipment Regulations 1998.

At least two employees trained in the use, inspection of and who are familiar with the machine and its safety features must operate the machine onsite. Particular attention must be paid to the stability of the machine, its limitations and emergency procedures.

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ALL staff must be correctly attached to the personnel cage/bucket using either a 'Work Position Harness' with short lanyard attachment to prevent falling or a 'Fall Restraint System' where falling from the bucket is possible. All staff must wear head protection with chin straps when working at height.

3.32 Vehicles and Driving

Refer to the Authority's Driving at Work Policy.

3.33 Drugs and Alcohol

Refer to the Authority's Drugs and Alcohol Policy.

3.34 Working Time Regulations

Working time is any period during which a worker is working, at the employer's disposal and carrying out their activity or duties, any period when the worker is receiving relevant training and any additional periods that the employer and workers agree by relevant agreement.

Employees will not be required to work more than an average of 48 hours in a seven-day period unless they have signed an individual opt out agreement to do so. The average is normally calculated over a 17-week rolling reference period but this can be successive 17-week periods if this is specified in a relevant agreement.

3.34.1 Call Out / Night Work

Where emergency or other call out attendance is required the manager requesting the work will ensure the employee is 'fit' to undertake the work i.e. the employee is not put at increased risk from fatigue.

Managers must ensure that employees are given adequate daily and weekly rest periods in normal working situations and especially in emergency or call out situations.

3.34.2 Young Workers

Workers under the age of 18 are considered as Young Workers and may not ordinarily work more than 8 hrs per day or 40 hours per week. They may not Opt Out of the Working Time Regulations.

3.35 Enforcement and Disciplinary Procedures

Employees or contractors who contravene company health and safety requirements or procedures will be notified in writing. The Authority reserves the right to exclude from site, temporarily or permanently, any personnel who breach company health and safety requirements or statutory legislation.

Contravention of health and safety requirements will be dealt with under the scope of the Authority's Disciplinary Procedure. Breaches of health and safety requirements may be treated as Gross Misconduct resulting in dismissal.

Full details of the Authority's disciplinary procedure and rules are available on the staff intranet.

3.36 Stress

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The Authority recognises that the health and safety performance, conduct and relationships with other persons at work may be affected by work related stress. The Authority adopts a proactive approach to stress management within the workplace applying the following rules: -

- a. Induction training will include advice to employees on the health risks associated with stress at work.
- b. Manager / Supervisors will make every effort to identify persons with possible stress related problems, and will assess the need for an individual stress assessment at the employees annual appraisal.
- c. Persons with problems will be counselled by their manager or agreed third party suitably qualified in occupational health to establish the extent of the problem and determine a rehabilitation programme if appropriate.
- d. Advice will be given to employees on the methods of controlling temporary work related stress through simple breathing and relaxation exercises.
- e. Where work related stress is identified, regular monitoring of the situation will be undertaken.

The guidance provided in HSE publication, 'Stress at Work' HSG116 will be followed as appropriate.

3.37 Expectant Mothers

When the need arises risk assessments shall be undertaken in respect of new or expectant mothers and ensure potential harm to the mother or unborn child is eliminated or controlled to acceptable levels. Reference will be made to the HSE publication 'New and Expectant Mothers at Work - A Guide for Employers' HSG122.

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