

Health and Safety Policy Change

SUMMARY

This report seeks approval for a change to WLWA Health and Safety Policy and Guidance to enable work placements for people with increased duty of care including young people, on our sites.

RECOMMENDATION(S)

The Authority is asked to: Approve the amendment to the Health and Safety Policy and Guidance to enable Vulnerable Persons to access the Abbey Road site to include work experience and work placements.

1. Introduction

WLWA Officers are seeking to amend the current Health and Safety Policy to ensure clarity on responsibilities regarding cases of enhanced Duty of Care and the accompanying Guidance which currently precludes Young Persons working on the Abbey Road site.

Abbey Road has been responding to the Climate Emergency by becoming a working example of circular economy. As we move away from being a 'tip' to a place of repair and reuse, we are generating lots of opportunities for volunteering and work experience.

The circular economy concept is rapidly gaining traction in the UK. In 2020, central government promised a Circular Economy Package that will 'keep resources in use as long as possible, minimizing waste and promoting resource efficiency'. The circular economy also has potential to deliver maximum impact social value, through the creation of green jobs and the opening of resources that disadvantaged residents may not otherwise get access to.

The Fixing Factory is just one example of the circular economy initiatives that WLWA is driving forward. We are currently working to divert bicycles; pushchairs; furniture; disability equipment and other items from waste to reuse. All these projects will generate valuable work experience opportunities, as well as reducing the cost of residual disposal for taxpayers and local authorities.

Last year, Abbey Road HRRC diverted over 500 items equalling 2.5 tonnes. We supported over 12 local schools and organisations working with disabled, low income and disadvantaged groups. Whilst we receive 1-2 reusable laptops per week at our site, one volunteer at the Fixing Factory can refurbish around 2-4 laptops in one day. Volunteer time is an extremely valuable commodity and if we utilise young people at the same time, we generate even further benefits.

1.1. Benefits of Proposed Change

The Benefits of the change in Policy and Guidance enables the core benefits of the wider Circular Economy work such as training opportunities and work experience. In addition to the individual benefits research has shown young people are one of the greatest drivers for change in behaviour at home and through this engagement with local schools wider community environmental education can be delivered.

Core benefits of the Circular Economy workshops:

- Boost employability for local young people
- Early engagement with Circular Economy principles
- Introduction to 'Green Industry'
- Increase local green skills development
- Increase opportunities for younger people in our Boroughs
- Increase equal access to resources by diverting them to those in need
- Reduce volume of residual waste & associated costs
- Reduce carbon footprint
- Secure more external funding for CE initiatives by showcasing all the above

1.2. This change will assist with achieving WLWA's strategic objectives:

- **Green Skills & Recovery:** The transition to a circular economy needs the development of different skills such as repairing existing objects, better understanding of how items work and being able to communicate the value of this work. Being able to provide work experience will contribute to achieving this. This year the Fixing Factory project will create a minimum of six work experience placements and provide 10 spaces on a certified IT skills course (from partner Mer-IT). There is increasing recognition in young people that relevant job skills are important, 85% of students surveyed during our outreach activity stated the primary reason they would use the Fixing Factory would be to gain new skills/knowledge to boost employability.
- **Carbon (neutral by 2030 and net zero by 2050):** Over 150 devices have been collected over the past 16 months, equalling 63 tonnes worth of embedded carbon. More carbon savings will occur by moving these devices up the waste hierarchy from recycling to reuse. Last year, west Londoners threw out 116,560 tonnes of electrical items. Over half of these were reusable (based on reuse diversion stats from Abbey Road).
- **Increasing Equality:** Brent borough has a significantly higher deprivation index than the rest of London.¹ Inequality in access to the internet and tech is known as the digital divide and affects at least 19% of adults in Brent.² Lack of IT skills increases isolation, reduces the chances of finding a job and accessing quality employment. By taking devices that would otherwise be wasted and donating

¹ Source: <https://www.trustforlondon.org.uk/data/boroughs/brent-poverty-and-inequality-indicators/>

² Digital Inclusion in Brent (Aug 2020) Report from Brent Council & Citizens Online

<https://democracy.brent.gov.uk/documents/s106782/Appendix%201%20-%20Citizens%20Online%20Report.pdf>

them to local communities, we aim to close the digital divide and increase equal opportunities.

- **Circular Economy Strategy principles:** keeping materials in use for longer and diverting them from residual waste. Reuse and recycling creates up to 10x more jobs than disposal.³ Our initiative has created 4.0 FTE green jobs and by normalising repair culture, our vision is to create many more. One day, we hope to see a Fixing Factory on every high street.

2. Risk

There is a greater duty of care required for specific groups of Vulnerable Persons such as Young People and therefore an enhanced requirement to supervise them whilst on site. This will continue to be assessed with both Circular Economy partners and our Health and Safety team. There may be a need to add some physical control measures at sites such as Abbey Road if identified as part of the risk assessment review with the provider and our Health and Safety advisor, e.g. additional pedestrian barriers, access requirements and/or signage.

2.1. Insurance

WLWA's insurance will cover 16 and 17 year olds undertaking work experience for WLWA at both the West Drayton and Abbey Road sites. However, comprehensive risk assessments must be in place (Section 2.1.1, p4). There is no need to change our current insurance policy.

2.2. Health & Safety

WLWA employ specialist Health & Safety advisors to complete all risk assessments. If this change is approved, the HS advisors will work closely with WLWA and partner organisations to ensure all activities are appropriately risk assessed, in accordance with WLWA's policies and appropriate safeguarding measures are in place.

2.3. Safeguarding

WLWA will be working with different schools, colleges and training providers. Their procedures and rules around safeguarding may differ. WLWA, with HS advisor guidance, will ensure all safeguarding procedures from partner organisations have been met and adhered to before allowing any young persons on site to complete work experience. They may mean undertaking DBS checks for relevant and appropriate WLWA staff.

3. Proposed Changes

3.1. Policy

The changes proposed for the Health and Safety Policy are to clarify the roles and responsibilities regarding groups Vulnerable Persons requiring an enhanced Duty of Care such as Young Persons. Proposed amendments are highlighted in Appendix 1.

3.2. Change to Guidance

WLWA's current Health & Safety Policy (Section 4.11 'Safety of Young People')

³ <https://friendsoftheearth.eu/press-release/new-report-half-a-million-new-jobs-could-be-created-in-europe-by-recycling-more/>

states that ‘Young workers under the age of 18 will be individually assessed as part of a Young Person’s risk assessment.’ (June 2019)

The accompanying ‘Guidance on Vulnerable Persons at Work’ document states: ‘For reasons of risk control West London Waste will not engage in the placement of children or young persons on work experience within the Abbey Road site.’ (June 2019).

The guidance was originally put in place because Abbey Road was solely an operational site, all the work opportunities at the time involved traffic and plant hazards which are controlled but deemed too high risk for young persons working in that environment.

Abbey Road has transformed to include other circular economy projects based out of office environments, where exposure to the high-risk hazards on site is greatly reduced.

The appended Health and Safety Policy and Guidance document (Appendix 1) includes highlighted amendments increasing requirements for Duty of Care, for working with Vulnerable Persons, with explicit changes to the requirements within the role profiles.

4. Financial Implications

Some site modifications and an amendment to the supervising structure on the site may be required, however these are expected to be of low cost.

There may be cost implications of DBS checks and/or WLWA staff time spent familiarising themselves with safeguarding policy documents. This will be determined by the placement coordinator or school/organisation we are arranging work placements through as each school and organisation have varying policies. There will also be staff time required to organise and administrate the work experience placements, although this is expected to be minimal.

5. Legal Implications

There is a change to the Health and Safety Policy to cover the increase in the Duty of Care required for Vulnerable Persons visiting the Circular Economy Hub work on our sites such as Young Persons and the potential for increased safeguarding and DBS requirements.

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West London Waste

Treating waste as a valuable resource

Health and Safety Policy

September 2022

Document Control

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Universal Safety Practitioners Limited

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Date of next review: September 2023 (or as dictated by legislative or Authority requirements).

Issue	Review Date	Changes to Policy
1.0	June 2017	Policy Review and Update.
2.0	June 2018	Update of organisational structure and competent person.
3.0	March 2019	Policy review and Update.
4.0	May 2022	Policy update – Management of risk in relation to children and young persons.
5.0	September 2022	Policy update – Management of risk in relation to those with disabilities.

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Foreword – by Chair of the West London Waste

West London Waste is fully committed to excellence and continuing improvement in the management of health and safety and consider it 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 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 West London Waste'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.

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, Risk Assessments and instructions to the policy document and issue them to the employees directly in their care.

We require all Managers, Supervisors and Contractors 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.

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 West London Waste'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 Authority.



Councillor Deirdre Costigan

Health and Safety Policy – Statement of Intent

West London Waste Authority, recognises and accepts fully, its responsibility to ensure the health safety and welfare of its employees and others who may be affected by its undertakings.

Effective health and safety management is of primary importance, standing above other systems and procedures within the Authority. We will develop, implement, manage and continuously improve effective health and safety management systems and procedures to identify foreseeable hazards and risks and develop effective control measures.

Managers and Supervisors will provide adequate resources, in the form of time, manpower and finances in the pursuit of health and safety excellence and will lead by example, to promote a positive and improving health and safety culture through effective communication with individuals and contractors under their direction.

All employees will receive a high level of health and safety training and information, to enable them to carry out their work in a safe and controlled manner. Work will be supervised and support given by specialist suppliers.

All staff members are expected to raise perceived short falls in health and safety, challenge the status quo and offer ideas for improvement. All staff members must follow safe systems of work and safe working procedures, contribute to the development of risk assessments and take full advantage of the health and safety training, information, and protective equipment provided.

Members of the public, contractors or others using our sites are expected to follow the site health and safety rules under the direction of site staff.

Employees identified as not following agreed safe systems of work, potentially putting themselves, their fellow employees or others who may be affected at risk will be subject to West London Waste's disciplinary procedure. Deliberate or wilful disregard of health and safety procedures by any person within the Authority will be treated as gross misconduct.

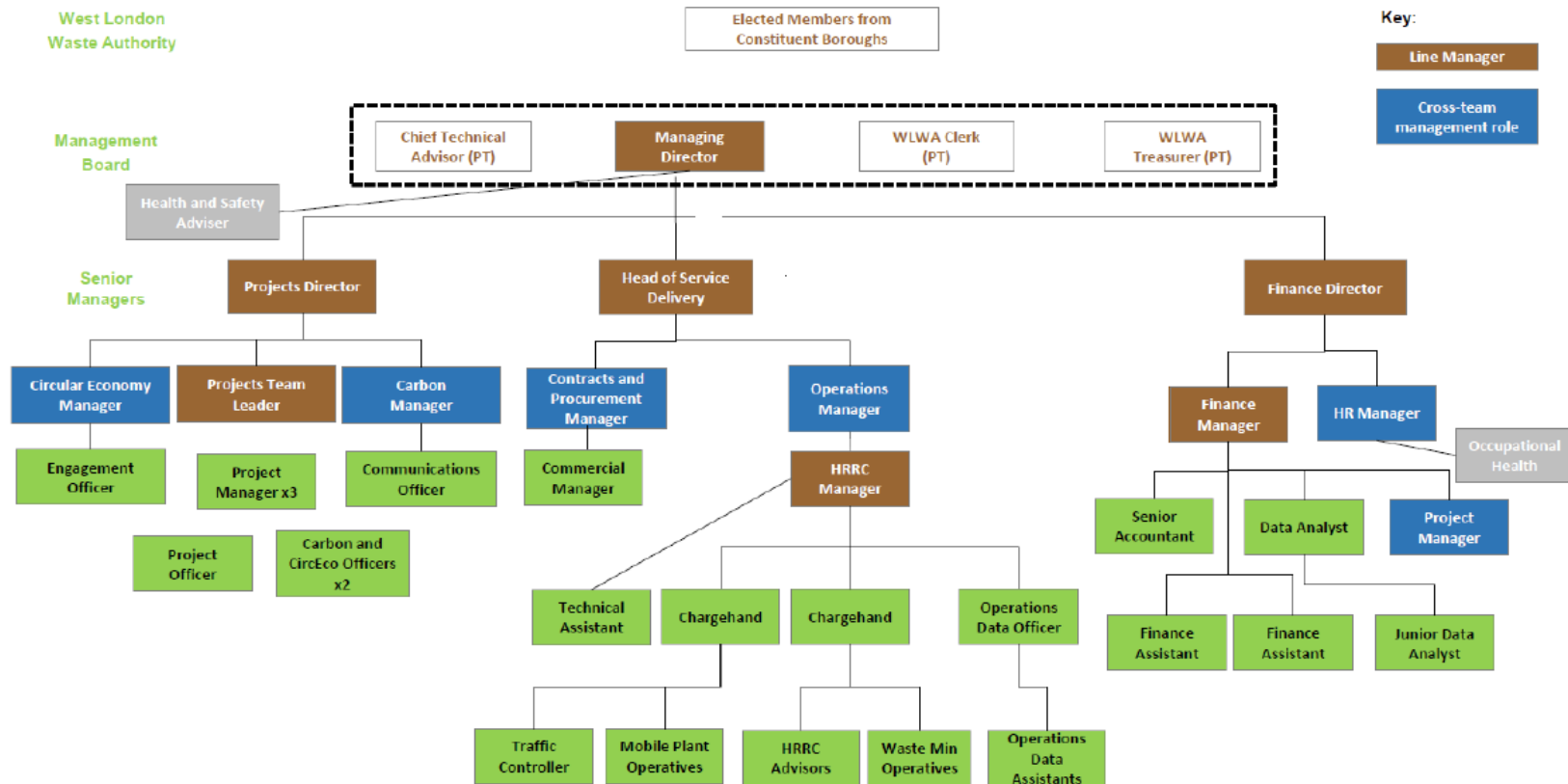


A handwritten signature in blue ink, consisting of a stylized 'E' and 'B'.

Emma Beal
Managing Director
13 September 2022

Organisational Structure

WLWA Line Reports Chart (no assumptions of hierarchy, grade or pay should be assumed from this chart)



Health and Safety Responsibilities

Managing Director

The Managing Director has overall responsibility for the development, implementation and review of the health and safety management function within West London Waste Authority. With the aid of West London Waste's appointed Health and Safety Advisors, external specialist consultants and members of West London Waste's Senior Management, the Managing Director will be responsible (so far as is reasonably practicable) for ensuring they:

Policy

- a. Facilitate the production, maintenance and review of this health and safety policy document, ensuring, through consultation, that the policy remains relevant to the undertakings of the organisation;
- b. Ensure that as part of the above activity, this health and safety policy document is distributed and brought to the attention of all employees within the organisation, and to all interested third parties;
- c. Ensure that they appoint a qualified health and safety professional, to act in the role as 'competent person', and aid in the management and coordination of health and safety and occupational health matters as detailed in this health and safety policy.

Communication

- d. Consult with all employees of West London Waste on operational matters including health and safety issues;
- e. Communicate with members of West London Waste's senior management (including the appointed Health and Safety Advisor) on issues which cannot be readily resolved, requiring Managing Director level input;
- f. Communicate with the Board of West London Waste Authority on any health and safety issues which cannot be resolved at Managing Director level.

Process

- g. Facilitate the process of development for all documentation and systems of work supporting this health and safety policy, including risk assessments, safe working instruction, emergency procedures and guidance documents;
- h. Take into account, resources necessary to maintain health and safety standards, when compiling budgetary requirements, including human resources and specialised skills, organisational infrastructure, technology and financial resources.
- i. 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.

Training and Information

- j.** Ensure that the appointed Health and Safety Advisor has the required levels of skill, knowledge and experience, to enable full completion of their duties;

- k.** Ensure a programme of health and safety training and information (including refresher training) is developed, with the assistance of the appointed Health and Safety Advisor and (where appropriate) specialist consultants, for all employee, management and supervisory levels within the West London Waste Authority.

Senior Managers

Senior Managers will have a delegated responsibility, through the Managing Director, for the day-to-day management of health and safety standards across West London Waste.

To this end, Senior Managers will be responsible for ensuring (so far as is reasonably practicable) that they:

Policy

- a. Facilitate the distribution of this health and safety policy document, throughout their areas of responsibility;
- b. Ensure that as part of the above activity, this health and safety policy document, as well as any other relevant health and safety guidance is distributed and brought to the attention of all interested third parties, including contractors and consultants;

Communication

- c. Communicate with the Managing Director on health and safety issues which cannot be readily resolved, requiring Senior Manager level input;
- d. Liaise with the appointed Health and Safety Advisor on all health and safety issues impacting their areas of responsibility, including the development and implementation of risk assessment, safe systems of work and training.

Process

- e. Work with the appointed health and safety advisor, to facilitate the process of development for all documentation and systems of work supporting this health and safety policy, including risk assessments, safe working instruction, emergency procedures and guidance documents;
- f. In respect of the engagement, employment or placement of vulnerable persons, respective senior managers will be responsible for ensuring that the relevant processes and documentation as detailed in the health and safety policy guidance document are fully embedded, to ensure the health safety and welfare of the vulnerable person (within their area of responsibility) is provided and maintained at all times.
- g. Take into account, resources necessary to maintain health and safety standards, when compiling budgetary requirements, including human resources and specialised skills, organisational infrastructure, technology and financial resources;
- h. Ensure new contractors, agencies and consultants are only engaged after they have been subject to appropriate assessment, regarding their skills, knowledge and experience in respect of health and safety, as detailed in the Control of Contractors guidance documentation.
- i. Participate in and support West London Waste's Health and Safety audit and inspection process;

Training and Information

- j. Ensure a programme of health and safety training and information (including refresher training) is implemented with the assistance of the appointed Health and Safety Advisor and (where appropriate) specialist consultants, for all employee, management and supervisory levels under their control.

Appointed Health and Safety Advisor

As required under the Management of Health and Safety at Work Regulations (Regulation 7(1), West London Waste should appoint a Competent Person (for the purposes of competent health and safety advice) to advise on relevant health and safety management issues impacting the organisation.

Coordinating directly with both the Managing Director and Operations Manager, as well as Senior and Site Managers, the appointed Health and Safety Advisor, will be responsible for:

Policy

- a. Ensuring that this health and safety policy, together with all supporting health and safety guidance documentation is subject to periodic review and update as required, to ensure all health and safety management processes remain in date and relevant to the undertakings of the organisation;
- b. Ensuring that all reviewed and updated and additionally developed health and safety guidance is brought to the attention of the Managing Director, for distribution to all relevant management and personnel throughout West London Waste;
- c. Supporting all Senior and Site Managers on the implementation and review of health and safety initiatives and procedures, as detailed in this health and safety policy and supporting guidance documentation;
- d. Working with appointed Supervisors, Chargehands and any union-appointed Health and Safety Representatives of non-union appointed Representatives of Employee Safety, on the implementation and review of risk assessments, safe working procedures, and all other health and safety initiatives.

Communication

- e. Supporting the Managing Director Ensuring that reports on West London Waste's health and safety performance are presented to the Board of West London Waste on at least an annual basis for review and used as a basis for continuous improvement;
- f. Ensuring the Managing Director and Operations Manager are advised regarding changes in health and safety legislation and industry guidance on health and safety impacting West London Waste;
- g. Supporting Senior and Site Managers on the completion of risk assessments and method statements, forming a basis for all agreed safe systems of work and safe working procedures;
- h. Presenting the findings of an accident investigation reports which have been carried out, for any significant incidents or injuries, which may occur.

- i. Ensure affective communication with any union appointed Health and Safety Representatives and non-union appointed Representatives of Employee Safety, to ensure inclusion as needed with these representatives.

Process

- j. Ensuring a system for the completion of risk assessments and method statements is in place, together with a process for bringing to the attention of all Senior/Site Managers and Supervisors, the findings of risk assessments, ensuring the development of safe systems of work;
- k. Carry out regular health and safety inspections of West London Waste's operational sites, with feedback reporting and analysis of any issues identified, to the Operations Manager;
- l. Developing and implementing a system of health and safety audits for the organisation, which should be carried out on an annual basis, with feedback to the Managing Director;
- m. Developing, with the assistance of the Managing Director, a timebound system for the management and close-out of any audit findings, arising from completed audits;
- n. The ongoing development and implementation of risk assessment-based safe working procedures, in-line with the requirements of the health and safety policy;
- o. The development, implementation and review of risk assessments and any emergency procedures as appropriate for West London Waste's operational sites;
- p. Providing qualified and competent support of West London Waste, in its role as 'Client' for any construction-related works which are carried out, ensuring the relevant members of West London Waste's Senior and operational management team are supported and advised as required, on compliance issues, as detailed in the requirements of the Construction (Design and Management) Regulations 2015;
- q. Fulfilling the duty holder position of 'Principal Designer' for all construction projects, falling within the remit of the aforementioned Regulations;

- r. The completion of any incident investigations on behalf of West London Waste, for accidents, incidents, near misses, cases of occupational ill health or dangerous occurrences, which may occur, involving members of West London Waste's employees, sub-contractors or members of the public, on any of West London Waste's operational sites/workplaces;
- s. Analysing of accident, incident and injury report data, including near misses, or minor injuries and the compiling of statistical information for both the Managing Director and Operations Manager;
- t. Notification to the Health and Safety Executive under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations, of any reportable injuries, diseases and dangerous occurrences, as required.
- u. Working with relevant Senior and/or Site Managers, on the health and safety management arrangements needed, including the completion of specific risk assessments and safe working procedures (including induction) required, for the temporary engagement of young persons, for the purposes of work experience etc.
- v. The above process will be expanded to include the management of vulnerable persons involved in projects either run by the organisation or where the organisation is involved and where activities where vulnerable persons are undertaking activities on West London Waste sites.
- w. Working with Senior and/or Site Managers in respect of the completion of specific risk assessments, leading to the development of safe systems of work for any pregnant workers or nursing mothers, employed by West London Waste;

Training and Information

- x. The development and implementation of training initiatives, including refresher training for the West London Waste including, induction training, Manual handling, fire safety and emergency procedures, Supervisory and Management health and safety requirements, and any other health and safety training requirements as identified through health and safety policy requirements, risk assessment and method statement control measures, and audit findings.
- y. To support any non-union appointed Representative of Employee Safety and union appointed Health and Safety Representatives, with detailed information, which they will need, to ensure full inclusion on the union and non-union health and safety function within the organisation.

Managers

Managers, will have local management control of personnel and activities within their areas of responsibility, and as such will be responsible for ensuring, so far as is reasonably practicable, (with the assistance of the appointed Health and Safety Advisor and Senior Management) that they:

Policy

- a. Ensure that this health and safety policy, and all supporting guidance documents, are brought to the attention of all persons under their control;

Communication

- b. Give assistance to members of their staff who bring to their notice health and safety matters, which they are unable to resolve;
- c. Monitor and review the adequacy of risk assessments and best practice by means of consultation with the workforce, local safety inspections, defect reports etc;
- d. Ensure that staff are aware of and comply with emergency/contingency plans;
- e. Encourage safety representatives to engage in 3 monthly inspections of work areas and operational activities;
- f. Ensure that all safety related incidents and injury accidents are recorded and reported promptly and accurately to Senior Managers and the appointed Health and Safety Advisor;
- g. Consult regularly with union appointed Health and Safety Representatives and non-union appointed Representatives of Employee Safety (where appointed) on relevant health and safety matters;

Process

- h. Demonstrate their commitment to the continual improvement of occupational health and safety performance, by setting a personal example and promoting a positive health and safety culture within the workforce;
- i. Deploy resources at their disposal to resolve health and safety matters;
- j. Ensure that service specific risk assessments are undertaken, completed, and continually reviewed, in association with the appointed Health and Safety Advisor.
- k. Working with the relevant senior manager and any officer responsible for overseeing the employment, engagement or placement of vulnerable persons, ensuring that all risk assessment and risk management controls identified through the process of risk assessment are fully implemented and maintained, for any vulnerable person, within their area of responsibility.
- l. Monitor contractors' safety performance on a regular basis as required by this health and safety policy, and as specifically detailed in the guidance document (supporting this health and safety policy) on Control of Contractors;
- m. Ensure that all work equipment is properly selected, used, inspected and maintained;
- n. Provide necessary levels of supervision of staff and operations under their control or responsibility;

- o. In association with the appointed Health and Safety Advisor, produce local safe working procedures and guidance documents, which are based on risk assessments, safety inspections, accidents and other relevant information;
- p. Periodically observe all work activities to ensure safe working procedures are being fully adhered to.
- q. 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;
- r. With the assistance of the appointed Health and Safety Advisor, investigate accidents, incidents and contributory factors and review safe methods of working and risk assessments and implement remedial actions to prevent a recurrence;
- s. Review the effectiveness of remedial action following an accident;
- t. Ensure that all required health and safety records are maintained;
- u. Participate in and support West London Waste's Health and Safety audit and inspection process;

Training and Information

- v. Identify staff safety training needs from Health and Safety Advisors reviews, team meetings, tool box talks and Appraisal and risk assessment processes;
- w. Stimulate interest and enthusiasm for health and safety matters amongst the staff under their control;
- x. 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;
- y. Bring to the attention of the Senior Managers and appointed Health and Safety Advisor, any health and safety issues they are unable to resolve.

Site Managers

Managers, will have local management control of personnel and activities within their areas of responsibility, and as such will be responsible for ensuring, so far as is reasonably practicable, (with the assistance of the appointed Health and Safety Advisor and Senior Management) that they:

Policy

- a. Ensure that this health and safety policy, and all supporting guidance documents, are brought to the attention of all persons under their control;

Communication

- b. Give assistance to members of their staff who bring to their notice health and safety matters, which they are unable to resolve;
- c. 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;
- d. Ensure that staff are aware of and comply with emergency/contingency plans;
- e. Encourage safety representatives to engage in 3 monthly inspections of work areas and operational activities;
- f. Ensure that all safety related incidents and injury accidents are recorded and reported promptly and accurately to the Operations Manager and appointed Health and Safety Advisor;
- g. Consult regularly with union appointed Health and Safety Representatives and non-union appointed Representatives of Employee Safety (where appointed) on relevant health and safety matters;

Process

- h. Demonstrate their commitment to the continual improvement of occupational health and safety performance, by setting a personal example and promoting a positive health and safety culture within the workforce;
- i. Deploy resources at their disposal to resolve health and safety matters;
- j. Ensure that all site or service specific risk assessments are undertaken, completed, and continually reviewed, in association with the appointed Health and Safety Advisor.
- k. Monitor contractors' safety performance on a regular basis as required by this health and safety policy, and as specifically detailed in the guidance document (supporting this health and safety policy) on Control of Contractors;
- l. Ensure that all work equipment is properly selected, used, inspected and maintained;
- m. Provide necessary levels of supervision of staff and operations under their control or responsibility for safety critical operations;
- n. In association with the appointed Health and Safety Advisor, produce local safe working procedures and guidance documents, which are based on risk assessments, safety inspections, accidents and other relevant information;
- o. Periodically observe all work activities to ensure safe working procedures are being fully adhered to.

- p. Ensure that any vulnerable person engaged, employed or placed (including those visiting site(s) as part of any initiative) within their area of responsibility are effectively supervised in line with the requirements of the risk assessment for the activities being undertaken by the vulnerable person. Furthermore, ensure that in line with the risk assessment, that the vulnerable person has received a specific induction to the site, which has been provided in a readily understandable, and that the vulnerable person is closely supervised at all times whilst on site.
- q. 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;
- r. With the assistance of the appointed Health and Safety Advisor, investigate accidents, incidents and contributory factors and review safe methods of working and risk assessments and implement remedial actions to prevent a recurrence;
- s. Review the effectiveness of remedial action following an accident;
- t. Ensure that all required health and safety records are maintained;
- u. Participate in and support West London Waste's Health and Safety audit and inspection process;

Training and Information

- v. Identify staff safety training needs from Health and Safety Advisors reviews, team meetings, tool box talks and Appraisal and risk assessment processes;
- w. Stimulate interest and enthusiasm for health and safety matters amongst the staff under their control;
- x. 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;
- y. Bring to the attention of the Senior Managers and appointed Health and Safety Advisor, any health and safety issues they are unable to resolve.

Supervisors and Charge-hands

Supervisors and Charge-hands will have day-to-day supervisory control of employees, and their activities, and as such, will be responsible for ensuring, so far as is reasonably practicable, (With the assistance of Managers and appointed Health and Safety Advisor, where needed) that they:

Policy

- a. Ensure that all staff under their supervision are aware of, understand and comply with West London Waste's health and safety policy and local instructions, operational procedures, rules and guidance documents, relative to the work undertaken.

Communication

- b. Discuss relevant health and safety subjects, on safe systems of work and risk assessment controls with employees under their control.

Process

- c. Working with the Site Manager and appointed Health and Safety Advisor, produce local safe working procedures and guidance documents, which are based on risk assessments, safety inspections, accidents and other relevant information;
- d. Working with the Site Manager and appointed Health and Safety Advisor, ensure that all site or service specific risk assessments are undertaken, completed, and continually reviewed
- e. Regularly observing all work activities to ensure safe working procedures are being fully adhered to;
- f. Carry out workplace inspections every 3 months, bringing the results of these inspections to their relevant Manager and appointed Health and Safety Advisor;
- g. Assist in the resolution of health and safety problems brought to their notice by staff, appointed Health and Safety Advisor, or Safety Representatives;
- h. Refer matters which they cannot satisfactorily resolve to their immediate supervisor or Manager.
- i. Ensure that any vulnerable person engaged, employed or placed (including those visiting site(s) as part of any initiative) within their area of responsibility are effectively supervised in line with the requirements of the risk assessment for the activities being undertaken by the vulnerable person. Furthermore, as part of any delegated responsibility in relation to the management of the site, ensure that in line with the risk assessment, that the vulnerable person has received a specific induction to the site, which has been provided in a readily understandable, and that the vulnerable person is closely supervised at all times whilst on site.

Training and Information

- j. Providing adequate supervision and instruction to their staff to enable them to work safely and advise the Manager of training needs where identified.

All Employees

West London Waste will strive to ensure the health, safety and welfare of their employees while they are at work. To enable the organisation to ensure this provision is effectively implemented, employees are reminded of their legal responsibilities (under the Health and Safety at Work Act 1974) to:

- a. Take reasonable care for the health and safety of themselves and of other persons who may be affected by their acts or omissions;
- b. Co-operate as necessary with the appointed Managers and Supervisors and appointed Health and Safety Advisor, to enable them to comply with West London Waste's statutory health and safety duties;
- c. Ensure that they do not intentionally or recklessly interfere with or misuse anything provided in the interests of health, safety or welfare.

In addition to these legal duties, all employees are required to:

- d. Report accidents, incidents, near misses or dangerous occurrences immediately to their line manager and recording them fully in the accident/incident book
- e. Take action to stop others acting in an unsafe or dangerous manner
- f. Contact their Manager or Supervisor, should they notice an unhealthy or dangerous situation;
- g. Attend safety training courses as and when arranged;
- h. Make the most of all training which is given, and follow all safe systems of work and control measures which have been implemented;
- i. Make proper use of equipment, safety devices, personal protective equipment as provided; It is important that employees do not under any circumstances carry out activities or operate machinery and plant, that they are not trained to use, which could cause danger to themselves or affect the safety of other persons, including members of the public;
- j. Co-operate with the investigation of accidents by Health and Safety Executive Inspectors or investigators acting for West London Waste.

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

- i. Their duty while at work;
- ii. Their responsibility for obeying instructions;
- iii. Their responsibility for reporting of accidents, incidents and dangerous occurrences;
- iv. The action to be taken on discovering a fire or hearing a fire alarm;
- v. The wearing of appropriate personal protective equipment (PPE);
- vi. The required training and authorisation to operate vehicles, plant and equipment;
- vii. The hazards to be aware of when handling wastes, and

- viii. Their responsibility for maintaining good standards of housekeeping.

Health and Safety Representatives

Union Appointed Health and Safety Representatives

West London Waste Authority welcomes the involvement and representation of their employees from recognised trades unions, in the form of union appointed and trained Health and Safety Representatives, as identified in the Safety Representatives and Safety Committees Regulations 1977 (as amended).

As identified in the Regulations and supporting guidance, health and safety representatives from recognised trades unions will be trained by the union in their required role, giving them the required standard of training to enable them to fulfil their role, as union appointed Health and Safety representative.

Where appointed, Union Health and Safety Representatives will:

- a. Represent employees generally on specific matters that will affect their health, safety and welfare;
 - b. Represent employees when Health and Safety Inspectors from HSE or Local Authorities consult with them;
 - c. Investigate accidents, near misses, and other potential hazards and dangerous occurrences in the workplace;
 - d. Investigate complaints made by an employee they represent about their health, safety or welfare in the workplace;
 - e. Present the findings of investigations;
- Carry out inspections of the workplace;
- f. With at least one other appointed representative, request in writing that a health and safety committee set up; and
 - g. Attend Health and safety Committee meetings

Representatives of Employee Safety

West London Waste also recognises, that there may be employees who are not members of a recognised union. In order to ensure that all employees across West London Waste are equally represented, on health and safety issues, West London Waste welcomes the appointment of a non-union Employees of Employee Safety as detailed in the Health and Safety (Consultation with Employees) Regulations 1996 (as amended).

In line with the requirements as detailed in the above legislation, West London Waste will enable the appointment of a Representative of Employee Safety from the existing workforce, enabling them to:

Make representation to the organisation on:

- a. Potential hazards and dangerous occurrences, brought to their attention by the workforce;
- b. General matters affecting the health and safety of employees they represent;

- c. Represent employees in dealings with health and Safety Inspectors

West London Waste will ensure that elected representatives receive the training they need to carry out their roles, as is reasonable in the circumstances, and will pay any reasonable costs to meet this training, including travel and subsistence costs.

West London Waste will also give the Representative of Employee Safety paid time necessary to carry out their functions and allow candidates reasonable time, with pay, to carry out their functions as a candidate in an election, as well as time to consult employees on health and safety.

Occupational Health Advisors

Appointed Occupational Health Advisors will provide the following services:

Health screening, including:

- Reviewing completed staff post job offer health questionnaires with any conditions of concern;
- 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.

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.

Biennial Health MOTs for all staff, comprising of:

- Mental health, stress and anxiety discussion
- Health questionnaire and wellbeing discussion,
- Body mass index,
- Blood pressure measurement,
- Vision screen,
- Hearing test,
- Blood sugar;
- Cholesterol test.

Annual Health Surveillance, include the following:

- **Audiometry** for staff at risk from exposure to noise, the need for which will be determined by West London Waste's Noise Risk Assessments.
- **Respiratory Surveillance** for staff at risk of exposure to airborne contaminants, the need for which will be determined by West London Waste'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.

Ongoing Occupational Health advice and consultation to managers. Telephone and e-mail advice will be available to managers between 9am – 5pm, Monday to Friday.

Occupational Health advice is available when required on policy development.

Refer to section 3.2 of West London Waste's Arrangements for a detailed overview of how these functions will be carried out.

Health and Safety Arrangements

Appointment of Health and Safety Assistance

As detailed in section 2.2.3, (Appointed Health and Safety Advisor), West London Waste has made this appointment, to aid in the effective management of health and safety issues impacting the Authority, and to aid compliance against all relevant health and safety legal standards.

This appointment has been made to ensure a dedicated resource for management and development of the current health and safety management system which the organisation has in place for health and safety.

In addition, any formally appoint of a qualified Health and Safety Advisor will enable the organisation to use this person/company's credentials in relation to third party accreditations etc, as West London Waste's competent person for health and safety management.

Specific detail regarding the outputs of the appointed Health and Safety Advisor is detailed in section 2.2.3 of this health and safety policy.

Health Surveillance

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

West London Waste has appointed Staywell Occupational Health Ltd to provide health surveillance to its employees as part of an overall occupational health service as outlined in section 2.2.8. The Authority may change its service provider from time to time.

These functions will be carried out as follows:

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 as part of the recruitment process for screening by HR personnel.

If this initial screening identifies that an employee requires a further medical assessment an appointment will be issued for them to attend, should they be offered the job. The job offer will be made subject to satisfactory assessment/health clearance.

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

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 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, either by post or email, 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 line manager.

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 West London Waste 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:

D4 records will be maintained by the Finance Team and employees will be reminded to obtain a D4 from their GP in advance of expiry. The Authority will reimburse employees for the GP charge for this service. Employees will return a copy of the D4 form to the Finance Team.

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:

New employees will be required to obtain a D4 from their GP before commencement of employment and provide it to the Finance Team. The Authority will reimburse the new employee for the GP charge for this service.

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.

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 West London Waste's Noise Risk Assessment will be used to determine which staff should undergo audiometric testing.

Process

Relevant employees will be required to attend a regular hearing test arranged by the Authority. 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 relevant Manager.

b. Respiratory Surveillance

Relevant 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 be required to attend an annual lung function test arranged by the Authority. Each employee will be informed of their results in writing and if any issue 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 relevant Manager.

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

c. Skin Surveillance

Relevant 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

Employees will be required to attend an annual test including completion of a questionnaire arranged by the Authority. Each employee will be informed of their results in writing and if any issue is identified, they will be referred to their GP for further assessment.

A report on the group results of skin surveillance will be forwarded to the relevant Manager.

Vaccinations

a. Hepatitis A and B:

There is risk assessed sorting and handling of wastes by hand. Control measures and protective equipment is in place. WLWA will be direct employees to their doctors to encourage up to date vaccination, if there is a charge for the vaccination, WLWA will reimburse the employee. There should 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.

Ongoing OH advice and Consultation to Managers

OH advice can be requested from the Finance Team who will arrange for the OH Advisor to provide appropriate advice and support.

Drivers and Mobile Plant Operators

Refer to West London Waste's Driving at Work Policy.

Risk Assessment

The requirements for employers to provide safe 'plant' and systems of work is detailed in the general duties of employers, within the Health and Safety at Work etc Act 1974.

As part of the development safe systems of work, the subject and requirements for the process of risk assessment are further detailed in the Management of Health and Safety at Work Regulations 1999, which require an assessment of the risks to the health and safety of employees and to anyone else who may be affected by the employers' operations. Employers having five or more employees are required by law to record the significant findings of the assessments.

Risk assessments should be 'suitable and sufficient'; and be sufficient in detail to allow for the full identification of hazards, risks and control measures. Identified risks should also be quantified for foreseeable risk level. Control measures should be proportionate and capable of controlling risk at source. They should also be formal control measures, used throughout the organisation, when carrying out the assessed task.

When carrying out risk assessments and implementing control measures, a hierarchy of risk controls should be used:

- 1) Elimination** Redesign the job or substitute a substance so that the hazard is removed or eliminated. For example, duty holders must avoid working at height where they can.

- 2) Substitution** Replace the material or process with a less hazardous one. For example, use a small MEWP to access work at height instead of step ladders. Care should be taken to ensure the alternative is safer than the original.

- 3) Engineering Controls** Use work equipment or other measures to prevent falls where you cannot avoid working at height. Install or use additional machinery such as local exhaust ventilation to control risks from dust or fume. Separate the hazard from operators by methods such as enclosing or guarding dangerous items of machinery/equipment. Give priority to measures which protect collectively over individual measures.

- 4) Administrative Controls** These are all about identifying and implementing the procedures you need to work safely. For example: reducing the time workers are exposed to hazards (e.g. by job rotation); prohibiting use of mobile phones in hazardous areas; increasing safety signage, and performing risk assessments. This includes giving adequate information and training to employees and information to others who may be affected by the risk.

- 5) Personal Protective Clothes and Equipment** Only after all the previous measures have been tried and found ineffective in controlling risks to a reasonably practicable level, must personal protective equipment (PPE) be used. For example, where you cannot eliminate the risk of a fall, use work equipment or other measures to minimise the distance and consequences of a fall (should one occur). If chosen, PPE should be selected and fitted by the person who uses it. Workers must be trained in the function and limitation of each item of PPE.

Policy

West London Waste will ensure that the process of risk assessments will be carried out for all activities, processes, plant, substances and equipment, risk assessments will be carried out and recorded in the following ways:

Process

- a. All activities carried out by staff will be risk assessed by the appropriate level of management e.g. Charge-hand, Supervisor, Site Manager or Manager using an agreed format and reviewed by West London Waste's appointed Health and Safety Adviser.
- 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.

Communication

The results of risk assessments and applicable safe working procedures will be communicated to all West London Waste staff and (where appropriate) shared with contractors and others who may be affected by identified risks.

Training and Information

Proportionate health and safety training will be given to identified employees, to enable them to carry out identified risk assessments. This training will be backed up with proportionate information, guidance and signage where appropriate.

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 West London Waste 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 West London Waste have a duty to raise the alarm in the event of fire and to follow their local site-specific fire safety emergency procedures.

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, ensuring security arrangements are maintained, and electrical equipment is tested, and maintained, as detailed in relevant risk assessments 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 to ensure that fire procedures are 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).

The fire assembly points are:

Britannia Court

The Green, opposite the main entrance to the Britannia Court

Twyford Site

At the red gate at the entry to the site before the vehicle checkpoint

West London Waste has compiled guidance on Fire Safety and Fire Risk Assessment, which should be read in conjunction with this health and safety policy.

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

Staff receive induction training when joining the organisation. Records of issue are kept with personnel files.

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

Consultation with Employees

A clear process of consultation with all members of the workforce is identified in job related health and safety responsibilities. Regular meetings between the Managing 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. In a bid to expedite health and safety initiatives, and discussion points, the organisations' Senior Management will involve both the appointed Health and Safety Advisor and any appointed Union or non-union representatives in consultations on health and safety issues.

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, West London Waste has a whistle blowing policy that allows staff to raise concerns with senior management in strict confidence.

Communication and Induction Training

The management team, in association with the appointed Health and Safety Advisor, will ensure every employee is made aware of the Health and Safety Policy and guidance documents through a company 'Induction and 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.

The management team will communicate changes to the Health and Safety Policy and Guidance Documents to all employees through the chain of responsibility outlined above or through direct briefings.

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.

Staff Training

Employees of West London Waste must be adequately trained and informed to perform their job effectively, safely and efficiently. The organisation 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, West London Waste 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 main office.

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

Training will be at West London Waste's expense and where practicable undertaken in normal working hours.

Vulnerable Persons - Safety of Children and Young People

As detailed by current Health and Safety Executive guidance of children and young persons:

- **A child** is anyone who has not reached the official minimum school leaving age (MSLA) in the school year in which they turn 16.

- **A young person** is anyone under the age of 18.

Careful consideration will be given to the subject of children and young people where they are either involved directly with West London Waste or as part of any supporting initiatives where West London Waste is involved. All activities involving either children or young persons will be individually assessed by the appointed Health and Safety Consultants, in conjunction with the relevant member of the organisations' senior management. This individual risk assessment will form part of the wider governance processes for these identified activities and processes.

As part of the development processes as detailed above, the organisations' Health and Safety Advisors will liaise with the organisers of the works, as well as relevant placement officers from the respective school or college from which the child or young person is being placed from. West London Waste has compiled Guidance on Young Persons, which should be read in conjunction with this health and safety policy.

Vulnerable Persons – Safety of those with Mental and Physical Disabilities

As detailed by current Health and Safety Executive guidance of disabled people within the workplace, disabled people and those with health conditions, including mental health conditions, should be given the opportunity to both get into and stay in work.

Irrespective of whether disabled individuals are being employed, being engaged on a work experience basis, or are visiting the West London Waste sites, as part of its various initiatives, a risk assessment approach is required. Furthermore, the Health and Safety advisors for the organisation will work closely, where applicable, with the organisations HR Department, to ensure that a cohesive approach is adopted, to ensure the enhanced duty of care is discharged.

West London Waste has compiled Guidance on safety of those with mental and physical disabilities, which should be read in conjunction with this health and safety policy.

Vulnerable Persons - 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.

West London Waste has compiled Guidance on safety of expectant mothers, which should be read in conjunction with this health and safety policy.

Vulnerable Persons - Lone Working

Lone Workers are those who work by themselves without close or direct supervision, which covers those working from home. West London Waste has compiled Guidance on lone working, which should be read in conjunction with this health and safety policy.

Control of Substances Hazardous to Health (COSHH)

It is the policy of West London Waste 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 West London Waste's own knowledge of the work 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.

As part of the risk assessment process and documentation, the following areas will be assessed and suitable information detailed within the assessment and manufacturers safety data sheet (MSDS):

- Agreed method of use;
- Any restrictions on use;
- First aid and firefighting procedures needed
- Storage arrangements
- PPE and respiratory protection required for the safe use of the substance.

Risk assessments will be monitored and reviewed periodically.

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

Flammable Liquids

The management of flammable liquids is managed in two elements:

1. Those received from customers at operational sites:
 - Used engine and cooking oils.
2. Those held and used by West London Waste:
 - Greases and oils for the maintenance of on-site plant and equipment;
 - Red diesel, held in above ground, double-bunded storage tank (3,000 ltrs).

Risk assessments under the Control of Substances Hazardous to Health Regulations (supported by manufacturers safety data sheets (MSDS) are to be carried out and reviewed as appropriate, or as dictated by process change and control measures brought to the attention of all personnel.

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.

Hazardous waste storage areas **MUST** be secured, adequately ventilated and clearly signed. All storage areas are to be subject to review, in line with the review of the COSHH risk assessments.

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.

These risks and agreed control measures will be brought to the attention of all persons identified as being at risk from these biological hazards, by means of training, and information.

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 soiled 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.

Personal Hygiene

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

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.

Manual Handling Operations

It is the policy of West London Waste 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, manual handling risk 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 West London Waste'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 the appointed Health and Safety Advisor, within 2 months of starting work for the company.

Individuals 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.

West London Waste has compiled guidance on Manual Handling and risk assessment, which should be read in conjunction with this health and safety policy.

Workplace Inspections

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

The organisations' Management Team in association with the appointed Health and Safety Advisor, 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.

Access and Egress

- A safe means of access to and from all workplaces must be maintained at all times.
- All internal walkways/traffic routes and access egress doors must be kept clear of obstructions.
- Worksites must be managed and maintained to minimise trip hazards for workers and the public.
- Works areas, and pedestrian/vehicular traffic routes must be adequately lit, with enhanced lighting and signage at pedestrian crossing points.
- 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.

Visitors

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

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 West Drayton offices should be accompanied, in compliance with the local procedures on site.

Where a visitor enters an 'operational' area at one of West London Waste's Waste Transfer sites they must be accompanied at all times by a representative of West London Waste.

The visitor must be briefed by the Site Manager or 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 the PPE requirements for the location, as identified in the risk assessments.

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

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 West London Waste premises they will be informed of any known hazards and made aware of emergency action plans.

Contractors will appoint an onsite safety representative.

Information required by the client

Risk Assessments and Method Statements

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

- the safety element of an overall work method statement
- a task safety analysis
- the significant findings of the risk assessment

The purpose of a risk assessment and method statement is to enable West London Waste 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 West London Waste's contractor competency checks.

Information required by the contractor

West London Waste 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)

Evaluation of the contractor's safety arrangements

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.

West London Waste has compiled guidance on the Control of Contractors, which should be read in conjunction with this health and safety policy.

Construction (Design and Management) Regulations (CDM)

The CDM Regulations 2015 focusses on the health and safety management procedures required for construction works. The Regulations, and supporting guidance documents specify what is termed as "construction" as well as identifying key duty holders, with agreed outputs, during the pre-construction and construction phases of the works.

Projects which last more than 30 days and have more than 20 people involved in the project simultaneously, or for projects lasting more than 500-person days, will be notifiable to the HSE, resulting the raising of the statutory F10 Project notification document. This document must be displayed on site for the duration of the works.

West London Waste has compiled guidance on the Construction (Design and Management) Regulations, which should be read in conjunction with this health and safety policy.

Work Equipment (PUWER)

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

West London Waste 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.

Any lifting activities will require a lift plan to be carried out as part of the planning process for the works. This lift plan must be carried by a qualified Appointed Person, as party of the planning for the lifting operation.

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.

Control of Noise at Work

West London Waste 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 80dB(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 West London Waste's operations an effective 'Ear Protection Zone' (EPZ) must be enforced with signs and/or barriers.

West London Waste has compiled guidance on the Control of noise at work, which should be read in conjunction with this health and safety policy.

Personal Protective Equipment (PPE)

It is the policy of West London Waste 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 West London Waste in good working order.

Defects to any personal protective equipment will be reported to the management and the item 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 recorded checks.

West London Waste has compiled guidance on Personal Protective Equipment, which should be read in conjunction with this health and safety policy.

Waste Disposal

All areas of work 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.

Staff will use the waste disposal and recycling facilities provided to sort and properly dispose of items.

Smoking

West London Waste 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 includes electronic cigarettes.

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 West London Waste buildings.

Accident Reporting and Investigation

It is the policy of West London Waste to record all incidents, near misses and accidents (including property damage) and comply with the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR)1995

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

West London Waste has compiled guidance on accident investigation and accident reporting, which should be read in conjunction with this health and safety policy.

Incidents and Injuries

All injuries and incidents occurring at work will be recorded on West London Waste'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 the main 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 appointed Health and Safety Advisor will review each accident or incident as soon as practicable after they are reported and recommend any additional or improved action where applicable.

West London Waste has compiled guidance on accident investigation and accident reporting, which should be read in conjunction with this health and safety policy.

Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) 1995 (as amended 2013)

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.

Injuries which occur, may be reportable, based on injury category and severity (such as fractured limbs etc). Injuries which are not classed as 'major' injuries, but result in the person being absent for over 7 days (not including the day of the incident) will become reportable, within the 15-day reporting threshold.

All fatalities must be reported immediately.

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

West London Waste has compiled Guidance on RIDDOR reportable incidents, which should be read in conjunction with this health and safety policy.

Accident Investigation

West London Waste 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, Managing Director and Health and 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 West London Waste's expense.
- h) The investigating officer will compile an initial report within 3 working days of the accident occurring.
- i) The completed report will then be submitted to and analysed by the 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, reports will be submitted to West London Waste 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 West London Waste's Disciplinary Procedure

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

First Aid

Only individuals with current First Aid at Work (FAW) or Emergency First Aid at Work (EFAW) qualifications are permitted by West London Waste 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.

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.

West London Waste has compiled Guidance on First Aid, which should be read in conjunction with this health and safety policy.

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.

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 or hired vehicles on West London Waste business must carry a first aid kit.

Display Screens and Workstations

West London Waste will comply with the Health and Safety (Display Screens Equipment) Regulations where applicable.

West London Waste has compiled Guidance on Display Screen Equipment, which should be read in conjunction with this health and safety policy.

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. Managers and Site Manager shall ensure these inspections are carried out and recorded where necessary.

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.

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.

Wherever possible, collective protection should be chosen over individual protection such as harnesses etc.

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.

Permanent Fixed Access

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.

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.

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.

Inspection Interval:

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

- 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.
- 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.
- 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.

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.

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.

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.

Lifting Operations and Lifting Equipment (LOLER 98)

West London Waste 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.

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.

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.

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 West London Waste 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.

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.

Vehicles and Driving

West London Waste has compiled guidance on driving at work, which should be read in conjunction with this health and safety policy.

Drugs and Alcohol

Refer to West London Waste's Drugs and Alcohol Policy.

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.

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.

Enforcement and Disciplinary Procedures

Employees or contractors who contravene company health and safety requirements or procedures will be notified in writing. West London Waste 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 West London Waste's Disciplinary Procedure. Breaches of health and safety requirements may be treated as gross misconduct resulting in dismissal.

Full details of West London Waste's disciplinary policy and procedure are available on the staff intranet.

Stress

West London Waste recognises that the health and safety performance, conduct and relationships with other persons at work may be affected by work related stress. West London Waste 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 employee's 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.