

ACUMEN DISTRIBUTION LTD

Health & Safety Policy

Issue No. 05
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HEALTH AND SAFETY POLICY

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HEALTH AND SAFETY POLICY STATEMENT

It is the policy of Acumen to ensure the Health, Safety and Welfare of all its employees, and any other persons who could be affected by our undertaking.

In accordance with the requirements of the Health and Safety at Work Act 1974, the Management of Health and Safety at Work Regulations 1999 and other applicable legislation, the company will, so far as is reasonably practicable, provide:-

- A working environment which is safe and without risk to health.
- Places of work which are maintained in a safe condition.
- Plant, equipment and systems of work that are safe, without risk to health.
- Information, instruction, training and supervision to ensure the Health and Safety of employees and other persons who may be affected by work activities.
- Specific arrangements to identify hazards, evaluate and control the risks to which its employees may be exposed whilst at work.

Each employee is of vital importance, because without employees we would be unable to meet the needs of our clients. Therefore the company places great importance in ensuring the Health and Safety and welfare of all of its employees. Persons in managerial positions have a key role in maintaining these standards and should regard their Health and Safety responsibilities towards persons under their direction, with equal importance to that of maintaining customer service levels and profitability.

The effective implementation of its policy will require the co-operation of employees at all levels. Employees are reminded that they have specific legal responsibilities to:-

- ensure the Health and Safety of themselves and of any other persons who may be affected by their act or omissions at work, and to:
- co-operate with their employers to comply with any statutory requirements placed upon them.

Ultimate responsibility for Health and Safety within the company lies with the Executive Committee who all ensure adequate resources are available to achieve the aims of this policy and monitor its effectiveness. The Policy will be reviewed annually and updated as necessary to reflect any changes in the services provided and legislative requirements.

Signature: Date:

Chris Doughty, Managing Director, Acumen Distribution Ltd

ORGANISATION

Introduction

General

Responsibility for Health and Safety within Acumen Distribution Ltd lies with the Executive Committee. They are responsible for ensuring an effective Health and Safety policy is maintained, ensuring sufficient resources are made available to achieve its aims and for reporting its overall effectiveness.

The Company Directors / Managers of Acumen Distribution Ltd are responsible for the production and implementation of general safety arrangements within activities and locations for which they are responsible in order to meet the aims set out in the Safety Policy Statement. They are also responsible for ensuring that a formal system of risk assessment is maintained, and making available any specialist help which may be required in the evaluation and control of specific risks.

Managers are responsible for ensuring that the general safety arrangements which form this policy are implemented, and for co-operating with risk assessment programmes within their areas to control specific risks in accordance with the guidance provided by the Directors. Any risks which cannot be effectively controlled should be upwardly reported to the Directors who will engage specialist help where required.

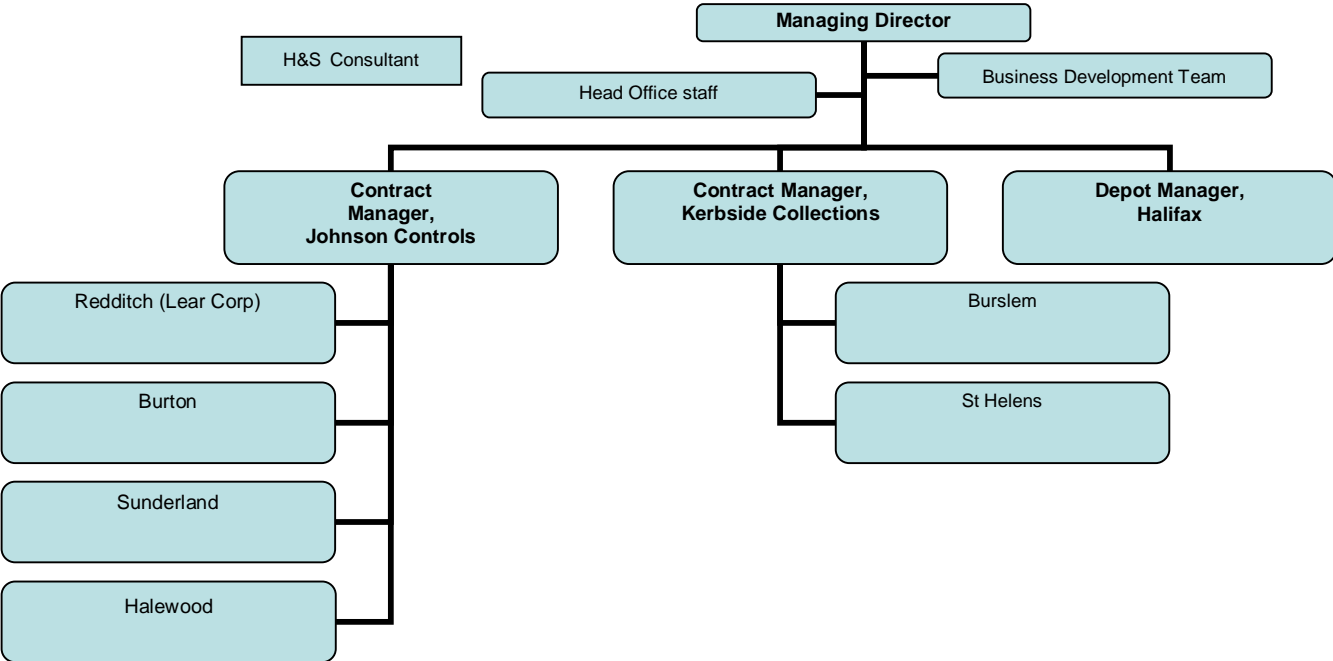
Administrative and Operational staff are responsible for the active implementation of the established safety rules and reporting any shortcoming in procedures to their Managers. A Central Co-ordinator at Coventry ensures that RIDDOR reporting is done in an accurate and timely manner.

All Acumen employees are responsible for the following laid down safety procedures, undertaking their work in a safe manner and reporting any unsafe occurrences/near misses.

Acumen retain a Health and Safety consultant to assist with undertaking the risk assessment and training programmes. H&S inspections are conducted in-house.

ORGANISATION CHART

Company Organisation Chart (with H&S responsibilities)



Please note: The positions indicated in bold are those which form the H&S Executive Committee

RESPONSIBILITIES

Health and Safety Responsibilities within Acumen

1. The members of the Executive Committee will:

- a) Be directly responsible for the establishment of a Company Health and Safety programme.
- b) Set the company's overall objectives for Health and Safety in a statement of policy.
- c) Provide appropriate staff, necessary funds, materials and any other resources necessary to meet the aims set out in the safety policy statement.
- d) Ensure that responsibility is properly assigned and accepted at all levels.
- e) Take a direct interest in such a programme and provide support to all persons carrying it out.
- f) Ensure that the policy for Health and Safety is maintained by periodic appraisal of the effectiveness of the safety programme as a whole, and effecting any necessary changes.
- g) Ensure that information on accidents and incidents is reviewed at management meetings and that remedial actions are both minuted and actioned.
- h) Report to the main Shareholder on the overall effectiveness of the H&S Policy

2. Managerial/supervisory staff will:-

- a) Ensure that general safety arrangements are suitable and sufficient for the common hazards present at their particular locations.
- b) Monitor the programme of risk assessment at their locations to ensure specific risks are adequately controlled (where appropriate by the development of safe systems of work), and upwardly report any risks which cannot be reduced to an acceptable level, or require specialist assessment.
- c) Co-ordinate the implementation of the Health and Safety policy in all areas under their control.
- d) Ensure that Administrative and Operational staff are aware of their responsibilities and carry out their duties in a correct and proper manner.
- e) Work with the site Health and Safety representative when an accident investigation is carried out and satisfy themselves that the correct conclusion is reached, that corrective action has been taken and notify the Managing Director of any serious accidents.
- f) Ensure that all accidents are recorded fully in the accident book and that RIDDOR reporting is being done as per the legal requirements.

3. Health and Safety Representatives will:

- a) Liaise with the first aiders/appointed persons on site following accidents and check that the accident report form has been duly completed.
- b) Carry out an investigation into the immediate and indirect causes of accidents, document the actions required on the accident report form and ensure that these are carried out.

- c) Complete the accident investigation part of the accident report form in a timely manner and ensure all 3 copies are distributed correctly (see form) including one copy to the Central Co-ordinator at Coventry; the accident report forms replace the standard accident book and MUST be kept in a secure file on-site for Data Protection reasons.
- d) Ensure that any RIDDOR reportable accidents have been advised to the Central Co-ordinator and reported in a timely manner in line with legislative requirements.
- e) Advise the MD in the case of more serious accidents in a timely manner.
- f) Ensure that H&S risk assessments are reviewed following an accident and/or a significant change in working. If help is required to do this, the Rep will request it.
- g) Investigate potential hazards, near-misses and dangerous occurrences; check the near miss log regularly and following up on any entries, including drawing them to the attention of the appropriate manager and emailing necessary details to the Central Co-ordinator at Coventry (copy to the location manager and MD).
- h) Investigate complaints by other employees relating to employee's health, safety or welfare at work, making representation to the appropriate Manager.
- i) Represent employees in consultation with HSE Inspectors or any other enforcing authority.
- j) Make themselves reasonably informed of the legal requirements relating to Health and Safety.
- k) Make themselves aware of the hazards in the workplace and the measures deemed necessary to eliminate or minimise the risk deriving from the hazard.
- l) Make themselves aware of the Health and Safety Policy and the arrangements for fulfilling the Policy.
- m) Encourage co-operation between the Company and employees in promoting and developing essential measures to ensure the Health and Safety of employees.
- n) Be consulted with by the Company on the introduction of any measure that may substantially affect the Health and Safety of employees.
- o) Consult with the location manager on matters relating to Health and Safety without delay.
- p) Receive appropriate training/coaching to enable them to carry out the function on H&S Representative effectively within the business.

4. First aiders/appointed persons will:

- a) Administer first aid when required.
- b) Ensure all accidents are recorded on the accident report form in a timely manner (this replaces the standard accident book and is a legal document), ensure that the form is countersigned by the injured party as well as the first aider, and that it is passed to the H&S Rep to complete the accident investigation section.
- c) Be aware of the RIDDOR reporting criteria (see appendix 4a).
- d) Advise the Central Co-ordinator at Coventry within the stated time periods of any RIDDOR reportable accidents.

5. Fire wardens will:

- a) Ensure that the people are clear of the building and that they assemble at the fire assembly point in the event of the fire alarm being activated.
- b) Close all windows and doors, and switch off appliances if it is safe to do so in the course of the fire evacuation.
- c) Conduct a roll call of all visitors and employees respectively, informing the senior person on site of anyone who cannot be accounted for.
- d) Ensure that details of staff and visitors on-site at any time are available in case of fire.
- e) Ensure that all necessary internal and external checks on fire equipment (including alarms, smoke detectors and emergency lighting where appropriate) are carried out and documented at the appropriate intervals.
- f) Ensure that fire escape routes are kept clear and that fire extinguishers are in correct position and usable.
- g) Check that extinguishers at the site are maintained annually.
- h) Remove empty extinguishers from service immediately and label them as inoperable and ensure they are replaced in a timely manner.

6. Administrative and Operational Staff (including drivers) should:-

- a) Familiarise themselves with the Company Safety procedures and apply them within areas under their control.
- b) Report to the Managers any hazards and/or near misses where the existing policy fails to adequately reduce the risk to an acceptable level.
- c) Ensure that machinery and equipment used is maintained, clean, safe to use and that any defects are promptly reported to the Manager.
- d) Ensure that all visitors and any new or temporary personnel are made aware of the hazards and risks of the workplace and that they are made aware of any precautions they must take to ensure their own Health and Safety. This includes issuing the contractor guidelines to those working on site.
- e) Ensure that all H&S necessary considerations relating to site visitors and contractors have been documented (and advised to staff where appropriate), including retaining copies of contractor risk assessments/method statements on file where required.
- f) Assist on safety inspections of areas under their control and in the risk assessment programme as required.
- g) Assist the H&S rep to investigate all accidents promptly to discover their causes and initiate action to prevent a recurrence.
- h) Provide a signed, dated and legible statement following an accident or incident, where they are either the injured party or a witness to the event.

7. ALL Acumen employees should:-

- a) Make themselves familiar with the Health and Safety Policy, procedures and established systems of work.

- b) Observe their legal duty of care to themselves and others as defined in the Health and Safety at Work Act, section 7.
- c) Observe all Health and Safety rules as defined in staff manuals, work instructions and procedures and, in particular, correctly use the personal protective equipment issued.
- d) Identify and report safety hazards discovered in the working area to their H&S Rep
- e) Report all accident or accidental damage to property or equipment, whether persons were injured or not.
- f) Complete the site near-miss log if any incidents occur which could have been more serious.
- g) Refrain from doing anything that may jeopardise the Health and Safety of themselves or of others.
- h) Co-operate in any safety inspections and/or risk assessments as required.
- i) Make suggestions to improve Health and Safety in the workplace.

8. The Health and Safety Consultant (working with the Executive Committee) is responsible for:

- a) Ensuring that Risk Assessments are conducted at agreed intervals and ensuring that specific risks identified at site level are evaluated and controlled.
- b) Ensuring that individual objectives for each site (which relate to the MD's overall objectives) are included as part of the risk assessment and monitoring process for each depot.
- c) Assisting with the implementation of appropriate action plans.
- d) Independently monitoring standards of Health and Safety practices and training during site visits and reporting to the Managing Director.
- e) Advising and assisting with Health and Safety training as well as the technical advice relating to their responsibilities under new and existing legislation and on practical implementation of the safety policy.
- f) Assisting in other areas where Health and Safety guidance is required.

9. The Central Co-ordinator will:

- a) Ensure that RIDDOR reportable accidents are advised to the ICC within the set time periods permitted
- b) Ensure that accident information on the accident record form (**including copies of signed statements**) is received from the sites and advised to the Managing Director in an appropriate manner, checking that he has been advised of any serious accidents.
- c) Ensure that details of all accidents, incidents and near-misses (based on the accident report forms submitted and other emails received) and RIDDOR reportable accidents are provided for the management meetings.
- d) Report all RIDDOR reportable accidents/incidents to the insurance company without delay.**
- e) Check with site personnel 4 days after any accident to ask if the injured party has returned to work and whether the accident has therefore become RIDDOR reportable.
- f) Produce graphs to identify trends

- g) Advise the H&S Consultant if a risk assessment needs to be reviewed following an incident

10. Other persons on Acumen premises

Only contractors who have been supplied with the Contract Guidelines and are aware of the necessary Health and Safety requirements will be engaged to carry out routine work. The Company has a legal obligation to safeguard the Health and Safety of other persons working in or visiting our premises, including the public, contractors and agency staff.

Contractors

All contractors working on site must comply with Company Health and Safety Policy; they will be given a copy of the Contractor Guidelines when commencing work. Contractors must be competent in the task they are employed to perform and they must provide their own safe system of work and risk assessments where there is a risk to others. They should be informed of any risk to themselves from operations carried out by Company.

Where Service Agreements are being established between the Contractor and Acumen Distribution Ltd, any specific requirements in respect of Health and Safety should be fully specified.

A Permit to Work system is required for suppliers undertaking building, electrical or hot work (see appendix 8). As part of this process suppliers are required to supply risk assessments and method statements on request. All welding on vehicles must be done off-site.

Visitors

Visitors should not be permitted to enter any work areas unaccompanied, unless they are familiar with the Acumen safety procedures in force. H&S information will be made available to visitors.

Where school visits are organised at a recycling transfer station, specific risk assessments will be prepared in advance and discussed with the trip organiser to make suitable arrangements regarding expected behaviour of the children as well as provision for restricting vehicle movement during the visit. Children will always be accompanied by teachers and other CRB checked staff.

OVERVIEW

Acumen is fully committed to safeguarding the health, safety and welfare of their employees and those who visit Acumen premises. To achieve the aims set out in the safety policy statement, general safety arrangements have been developed.

The risk assessment programme is at the centre of Acumen's proactive monitoring policy. Assessments are undertaken at agreed intervals by the appointed Health and Safety consultant or a suitably qualified nominee – see appendix 2 for the Risk Assessment schedule. The resultant safe system of work is integrated into staff manuals/work instructions and is communicated to staff. Acumen is committed to the need for effective remedial actions and check that all required actions are carried out in a timely manner by the appointed person. Both generic and specific risk assessments are carried out.

An on-going programme of safety inspections, carried out by the nominated H&S representatives across the sites, will monitor the implementation of the safety arrangements. Management will ensure all relevant legislation, regulations and codes of practice will be made known to and implemented by all members of staff.

Acumen also has a series of reactive monitoring methods in place to ensure that once accidents and incidents occur, lessons are learned to avoid future recurrence.

A series of H&S arrangements are also in place at each site to ensure that staff have access to the necessary facilities and equipment to safeguard their health and welfare.

Acumen is committed to training staff regarding H&S and consultation arrangements are in place at all sites.

PLANNING

The following arrangements are in place to identify risks and determine controls.

Risk Assessment

General

The Management of Health and Safety at Work Regulations 1999 requires all employers to assess risks of staff and others arising from their undertakings.

The assessment process will:-

- identify persons especially at risk
- identify the hazards present
- identify the risks associated with those hazards
- assign scores representing severity and likelihood of the risks (taking into account existing control measures) and multiply them together to get a risk factor
- recommend remedial actions required
- ensure appropriate timescales and responsibilities are assigned to complete the necessary remedial actions in a timely manner
- Ensure suitable records are maintained of risk assessments and action plans at all the sites

Procedure

A system for the assessment of risk at Acumen locations is used to identify and, where practical, eliminate risks to staff. Details are shown in appendix 1. In many cases a system of work will be well established, the assessment procedure in such cases should confirm that the existing system of work is appropriate. The procedure defines the action required to undertake an assessment and what should be recorded.

Generic risk assessments will be carried out at all sites in accordance with the risk assessment schedule (appendix 2) and will be reviewed after an accident or a significant change in the way of working.

Guidance Notes

Risk assessments are carried out by personnel who are competent in the risk assessment process, but who also have a thorough understanding of the task or job being assessed. The assessor is also aware of his/her own short-comings and will ask for help when required.

The process, item or area for assessment is identified. This may be part of a role, for example, a LGV driver coupling up at Burton, or may be an activity such as data entry in the office environment.

The associated hazards are listed that are likely to be encountered. Hazard is something with the potential to cause harm. Risks are also documented; these are the potential outcomes in the event of the hazard causing harm.

- Only for the hazards that could **reasonably** expect to cause significant harm under the conditions encountered in the workplace are identified, for example:

- Working at height (for example on a trailer bed)
- Trailing wires
- Slippery surfaces
- Fire hazards (such as storage of combustible substances)
- Chemicals
- Moving parts of machinery
- Objects stored or moving above shoulder height
- Movement of vehicles
- Electricity

- Dust
- Fumes
- Manual Handling
- Use of Display Screen Equipment
- Noise
- Stress
- Poor Lighting
- Extremes of temperature

These are some examples of the risks which may be associated with the above hazards:

- Slipping, tripping stumbling & falling
- Fire
- Chemical burns, explosion, poisoning etc
- Finger or clothing entrapment
- Ejection of materials
- Falling objects
- Crush injury
- Electric shock, burns, fire
- Occupational asthma, breathing difficulties etc
- Headaches
- Manual Handling injury such as slipped disk, shoulder injury etc
- DSE related diseases such as Carpel Tunnel Syndrome, Repetitive Strain Injury etc
- Hearing loss
- Stress-related illness
- Slips and trips due to poor lighting
- Extremes of temperature leading to fainting,, fatigue, frostbite etc

Those who may be harmed are also identified, for example:

- Office staff
- Drivers
- Contractors
- Personnel sharing the workspace
- Cleaning staff
- Visitors
- Members of the public

The things already done to control the risk are listed (existing control measures).

The severity and likelihood of the potential harm are calculated (taking into account the control measures in place) using the following guidelines:

Severity:

- 5 Death
- 4 Major injury, disabling disease
- 3 Lost time injury (over 3 days)
- 2 First aid injury
- 1 No injury

Likelihood:

(include the factor of how many and what type of people could be affected):

- 5 Certain, imminent
- 4 Very likely
- 3 Likely
- 2 Unlikely
- 1 Very unlikely

The scores are then multiplied together to arrive at a ranking score which produces a number score between 1 and 25.

The ranking score is assessed and the assessor considers what is needed to be done in order to make further improvements. Except with absolute requirements, the phrase “as far as is reasonably practicable” will be borne in mind at this stage; the risk identified is weighed against time, trouble, effort and money of putting measures in place to mitigate that risk.

As a guide:

- 15 – 25 is high risk (may require the provision of considerable resources involving equipment, training etc)
- 5-12 is significant risk and will require appropriate levels of resources
- 1-4 is low risk but actions should still be taken where appropriate to reduce the risk still further

L I K E L I H O O D	Almost Certain	5							
	Likely	4							
	Even Chance	3							
	Unlikely	2							
	Improbable	1							
			1	2	3	4	5		
			Negligible	Slight	Moderate	High	Very High		
			SEVERITY/CONSEQUENCE						

The assessor will always consider if the risk can be eliminated first. If this is not possible other controls, such as reduction of risk at source, enclosure of machinery, removal of the person from the risk area or reduction of contact – and as a last resort – the use of personal protective equipment can be used.

If action is required but cannot be taken immediately, ensure that the action required is transferred onto the action plan and a priority assigned.

Timescales for action are assigned according to the ranked priority; as a guide high risk actions will be assigned a short timescale (e.g. 1 week for the initial action to be completed), those with medium risk score up to a month to take action and those with a low risk score up to 3 months to take action.

Ownership

Irrespective of who carries out the risk assessment at each location, the location manager has overall responsibility for ensuring that the risk assessment action plan is completed and closed off within the agreed timescale. It is also the responsibility of the owner to ensure that records of risk assessments, action plans and any other related documentation is retained at the sites in a tidy, organised and retrievable manner.

Review

Risk assessments are reviewed for three reasons: when there is a significant change in the way of working, following an accident/significant near miss, or on a periodic basis, normally once a year for the main operational areas. It is the responsibility of the supervisor at each depot to advise if he feels there has been a significant change in the way of working, and that the risk assessment requires review.

Specific Assessments

Where a need for a specific risk assessment is identified, the following areas will be the subject of separate risk assessments:

- First aid (all sites – see “site arrangements” section and appendix 5)
- Workplace Health, Safety and Welfare (all sites – see “site arrangements” section)
- Control of Substances Hazardous to Health (under the COSHH Regulations)
- Dangerous Substances and Explosive Atmospheres (under the DSEAR Regulations)
- Manual Handling Operations
- Display Screen Equipment
- Noise
- Work Equipment (in accordance with PUWER, The Provision and Use of Work Equipment Regulations)
- Lifting Equipment (in accordance with LOLER, The Lifting Operations & Lifting Equipment Regulations)
- Working at Height (under the Working at Height legislation which became law in April 2005)
- Confined Spaces (under the Confined Spaces Regulations 1997)
- Asbestos
- Legionella

The H&S consultant or a suitably qualified nominee will carry these out in accordance with the relevant legislative requirements. More information on the above, including an explanation of the acronyms used, is provided in the section “Specific Health and Safety regulations”.




Environmental Risk Assessments




Environmental risk assessments are in place for the Food Waste kerbside collection service and Food Waste Transfer Station at Burslem, Stoke on Trent.

Fire Precautions

Fire risk assessments

Specific fire risk assessments will be carried out in conjunction with the generic risk assessment programme. These follow the usual risk assessment format but specific fire risk assessment guidelines issued by the fire service are used. These cover the following areas:

-  Hazard identification: Identification of combustible materials/sources of ignition/persons at risk/likelihood and severity calculation
-  Fire detection and warning systems in place
-  Means of escape in case of fire and distances to travel to the nearest exit

-  Provision of fire fighting equipment
-  Planning for an emergency and staff training
-  Maintenance and testing of fire equipment

For each site once the fire risk assessment has been carried out, an assessment action plan will be drawn up and remedial actions followed up to ensure they have been carried out.

Fire wardens

Sufficient fire wardens are appointed at each site and their names are displayed. Their responsibilities are laid out in the "organisation/responsibilities" section.

Evacuation Procedure

Formal fire evacuation procedures are in place for all occupied buildings. They should identify the means of raising the alarm, the means of escape from the building and the designated fire assembly point(s).

Fire Extinguishers

Fire extinguishers should be provided in every building, suitable for the type of risk.

- Water extinguishers (all red) should be provided where there is a normal fire risk.
- Carbon Dioxide (black collar) or Dry Powder (blue collar) extinguishers should be provided where there is a risk of electrical fires.
- Foam extinguishers (cream collar) and fire blankets should be provided for flammable liquid fires in kitchen areas.

All extinguishers should be regularly checked and maintained by an approved contractor at least on an annual basis. Records to this effect will be maintained on each extinguisher. Where extinguishers are kept on vehicles these must also be subject to annual maintenance.

Only persons who have received training in the use of fire extinguishers (including ADR drivers with a current licence) should ever attempt to extinguish a fire and only then if it is safe to do so. Staff are trained not to tackle a fire unless they have received appropriate training.

Raising the Alarm

All locations should have a defined and communicated means of raising the alarm and evacuating the building. This may be by means of an automatic fire alarm system, a hand bell or by shouting "fire, fire fire".

Legislation regarding Fire Risk Assessments

The Fire Safety (Regulatory Reform Order) Order 2005 has been designed to simplify the existing 120 pieces of legislation by providing a risk-based system which will be easier to understand and follow. Fire certificates are no longer issued and a risk assessment based approach is required. All sites need to have an up-to-date fire RA completed, with any recommendations addressed. It is the responsibility of the fire warden at each site to check that this has been done, even on shared sites where facilities management is not under the direct control of Acumen.

PROACTIVE HEALTH AND SAFETY MONITORING

Health and Safety Monitoring

To maintain standards of health, safety and welfare, a programme of inspections and high-level positional review audits is implemented in addition to the ongoing risk assessments.

Safety Inspections

Safety inspections (see appendix 3) will be undertaken at the sites, at interval between the risk assessments. The results will be brought to the attention of the site manager who may require further action to be taken as a result.

Safety Hazards/Near Miss reporting

Operational staff will review the areas under their control on a daily basis to ensure there are no obvious safety hazards. If any hazards are identified they should be rectified immediately. If this is not possible, suitable warning should be erected and the Manager notified.

Any safety hazards noted by employees during their work should be immediately reported using the near miss log. The hazard will be investigated by the site Health and Safety representative and appropriate remedial action will be taken.

REACTIVE SAFETY MONITORING

The following arrangements are in place to ensure that effective lessons are learned from incidents and accidents which have occurred, and that remedial actions are carried out and documented to prevent the issues recurring in the future.

Accidents

(see also appendix 4a and 4b)

Accident Reporting

In the event of an accident at work, Company employees will:-

- Seek assistance from a first aider / appointed person
- Complete the accident report form (N.B this replaces the new format accident book which no longer needs to be completed)
- Ensure that the Health and Safety representative on site has been advised of the circumstances and details of the accident to enable him/her to complete the necessary accident investigation (see appropriate section on form).
- **Provide a statement as soon as practical following the accident**
- Ensure that the location manager is aware that the accident has occurred.

Accident Report Form (replaces accident book)

Acumen Distribution Ltd have applied for, and have been granted, special permission from the Industrial Injuries unit to replace the usual accident book with the in-house Accident Report Form (copies are kept at all sites).

The accident report form must be completed following every accident involving personal injury. This will normally be filled in by the first aider/appointed person, in conjunction with the person who had the accident. The form asks for basic information about what happened and also contains the details which are required by statute in the normal accident book record.

The 3 part form is completed and signed by both the first aider/appointed person and the injured party. All three copies are then passed to the H&S Rep who conducts an investigation (see below).

In addition to completing the form, both the injured party(ies) and any witnesses must make a statement, as soon as is practical following the accident. These must be legible (typed up if necessary) and signed and dated by the person making the statement.

Accident Investigation

After any accident an investigation will be carried out by the site Health and Safety Representative (or a suitably qualified nominee) in conjunction with the location manager where appropriate. Details of this investigation are recorded at the end of the accident report form and must be completed in a timely manner. The H&S Representative will then split the copies: one for the injured party, one for the site H&S Reps' records (this must be in a secure file for Data Protection reasons) and one for the Central Co-ordinator at Coventry. The Central Co-ordinator will also store copies in a secure file. **The Co-ordinator is also responsible for requesting a copy of the signed statement for each accident involving injury.**

Copies of report forms for more serious accidents will also be passed to the Managing Director without delay; in such instances he must be advised by telephone as soon as possible after the accident.

If, following this process, the H&S Rep deems that the accident warrants further investigation the H&S Rep will advise the MD. If the MD then decides that further investigation is indeed required (after reviewing the details) this will be carried out normally with the help of the H&S Consultant. All RIDDOR reportable accidents will normally be investigated. A formal report will be produced looking

at the direct and indirect causes of the accident, and making suggestions for remedial action to prevent recurrence.

The Central Co-ordinator is responsible for ensuring that all RIDDOR reportable incidents/accidents are reported to the insurance company.

The H&S Rep will also ensure that the appropriate risk assessment is reviewed following an accident to ensure that it is still applicable; if not the H&S Rep will request a new assessment.

Accident Information

The MD will review the copies of the accident report forms held by the Central Co-ordinator on a regular basis. Where accident trends are identified, the senior management team will discuss this at their regular meetings, document these discussions and agree on appropriate remedial actions to address the underlying cause. These will be actioned and followed up. The outcomes of any accident investigations will also be discussed at these meetings.

RIDDOR reporting

Under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995, certain injuries, diseases and dangerous occurrences must be reported to the Incident Contact Centre (ICC) at Caerphilly. This is done by the Central Co-ordinator at Coventry in conjunction with appointed site first aiders. This can be done online via the website; www.riddor.gov.uk. It is illegal to fail to report an incident or accident under RIDDOR if it falls under the 1995 Regulations.

Reporting by the quickest practicable means

Work related accidents and acts of violence resulting in certain specified injuries or death must be notified by the quickest practicable means (usually telephone on 0845 300 9923 between 8.30am and 5pm Monday-Friday) by the Central Co-ordinator within 24 hours. Specified injuries include any fracture, other than to the fingers, thumbs or toes (including a break, crack or chip) and loss of sight (temporary or permanent). More details of accidents and incidents which are reportable within 24 hours are given in appendix 4a.

It is particularly important in such cases that the Central Co-ordinator is advised as soon as possible following the accident. In the event that he/she is not available, the first aider at the site must telephone the ICC number and report the accident or incident within 24 hours. However the Central Co-ordinator must be sent a copy of the F2508 form retrospectively for central records to be retained.

The notification by telephone must be followed up within 10 days by a form F2508. This may be emailed back by the ICC following the telephone call; the Central Co-ordinator will ask the first aider who reported the incident to confirm that the details are correct.

Reporting within 10 days

If a member of staff is away from work or incapable of undertaking his/her normal job for a period of more than 3 days following the day of the accident (including weekends), a form F2508 also has to be completed and submitted to the ICC. This is the most common source of RIDDOR reportable accidents and it is the responsibility of the first aider who completed the accident book to check whether an accident results in more than 3 days off work. These must then be reported to the Central Co-ordinator in a timely manner to enable the report to be submitted within the 10 day timescale. These can be emailed as an attachment to the Central Co-ordinator by downloading the RIDDOR form from the website.

The Central Co-ordinator will check with the site involved 4 days after an accident to ask if the employee has returned to work in order to ensure that all RIDDOR reportable "over 3 day" injuries are reported accurately.

Any accident resulting in a member of the public being taken to hospital (other than road traffic accidents), certain diseases and specified dangerous occurrences must also be reported. The Company's insurers must also be notified as soon as practicable of any serious accident, dangerous occurrence or diagnosis of disease.

More details are available in appendix 4.

All RIDDOR reportable accidents/incidents must be reported to the insurance company without delay.

Incidents, dangerous occurrences and near-misses

Incidents involving damage to property or equipment

Where an incident occurs involving damage to property or equipment (other than a road traffic accident – see later), the H&S Rep or a nominee must inform the Central Co-ordinator by email with a copy to the location manager and the MD, including the following details:

- Name of the person (s) involved
- Property or equipment damaged
- Date, time and location details
- Approximate value of property/equipment damaged
- Operational consequences (if any)
- Health and Safety implications (if any)

This email must be sent within 24 hours of the incident. Where required the MD will request an appropriate investigation.

Dangerous Occurrences

The following dangerous occurrences (relevant to the activities of Acumen) are RIDDOR reportable within 24 hours, **even if there is no personal injury**:

- Overturning of fork-lift truck
- Collapse, overturning or failure of load-bearing parts of lifting equipment
- Failure of any freight container in any of its load-bearing parts
- A dangerous substance being conveyed by road is involved in a fire or released
- Explosion or fire causing suspension of normal work for over 24 hours;
- Sudden, uncontrolled release in a building of: 100 kg or more of flammable liquid; 10 kg of flammable liquid above its boiling point; 10 kg or more of flammable gas; or of 500 kg of these substances if the release is in the open air;
- Accidental release of any substance which may damage health.

In the event of any of these occurring, the H&S Rep must contact the Central Co-ordinator IMMEDIATELY to arrange for him/her to report the dangerous occurrence by the quickest practicable means. Details must also be confirmed by email to the Central Co-ordinator (copy to the location manager and MD) with the following included:

- Name and address of the person (s) involved
- Equipment involved
- Date, time and location details
- Details of exactly what happened

Once the RIDDOR report is submitted the MD will normally request a formal investigation by the H&S Consultant.

The H&S Rep must also check the risk assessment relating to this activity to ensure it continues to be applicable.

Near misses

Where a near-miss incident occurs where no-one was injured and there was no damage to property or equipment, but which could have been more serious, staff are required to write the details in the near-miss log onsite and inform the H&S Rep. The H&S Rep will check the near miss log weekly.

The H&S Rep is then responsible for advising the Central Co-ordinator by email (copy to the location manager and MD) with the following details:

- Name of the person(s) involved
- Date, time and location details
- Details of what happened

The MD will decide if further investigation is warranted. The H&S Rep must also check the risk assessment relating to this activity to ensure it continues to be applicable.

Road Traffic Collisions

Where drivers are involved in an RTC, detailed procedures to follow for dealing with insurance claims etc are provided in the staff manuals. Where the driver is injured he must also follow the procedures set out in the section "Accidents" above and but **normal RIDDOR reporting criteria DO NOT normally apply** unless the person was killed or injured as a result of exposure to a substance being carried or the person was injured or killed in connection with loading or unloading activities etc (contact the H&S consultant for clarification if unsure).

SITE ARRANGEMENTS

The following provisions are in place at the Acumen sites to ensure the ongoing safety and health of Acumen employees and visitors.

Health and Safety Representative

All sites have an appointed H&S Representative who acts as a central point for both upward and downward communication on matters relating to Health and Safety.

First Aid

First aid assessments

A documented first aid assessment is completed at each site (see appendix 5). This assessment will take into account the following factors:

- Number of people on site and visiting the site
- Type of work carried out
- Proximity to NHS A&E services
- Previous accident trends
- Spread of personnel across the site
- Annual holidays of the first aiders
- Any remote or lone workers

A copy of the depot-specific assessment is actioned and kept on file at each site.

First Aiders and Appointed Persons

Depending on the outcome of the first aid assessment, at least one trained first aider will be available at all times at locations where there is a significant risk of injury.

Where there is no risk of significant injury, the number of employees is low and emergency facilities are available locally, a person will normally be appointed to maintain medical supplies and take charge in an emergency. Appointed persons receive appropriate training and can be used where the risk is reduced.

First Aid Supplies

First aid supplies will be checked and maintained; these will be available for use at all times. No medications will be held in first aid kits or be issued by first aiders / appointed persons.

General

First aid equipment will be clearly on display in public areas and/or notices indicating where to find it will be displayed. The names and locations of first aiders / appointed persons will also be displayed on the noticeboard.

Records of employees treated are maintained using the accident report form which replaces the accident book (special permission has been granted by the Industrial Injuries Unit for this). This record includes the name of the injured party, date, time and details of the incident, injury and treatment. This is a 3 part document and copies retained by Acumen are kept in locked, confidential files. Copies of accident reports are strictly controlled to ensure that personal information is not available in contravention of the Data Protection Act.

First aid supplies and the training of first aiders/appointed persons are monitored regularly and any first aiders/appointed persons who leave the company will be replaced in a timely manner.

Smashing glass policy

Due to the high risk of injury associated with smashing glass on the kerbside collection vehicles, Acumen have a policy whereby glass must be placed rather than smashed into the stillages. Glass must also not be smashed to make room, as this carries a high risk of flying glass. Suitable PPE, including a rubber apron and a face protector, must also be worn during this activity. Further details are provided in the relevant section of the staff manual.

Housekeeping

General

Every workplace including furnishings and fittings are kept clean on a regular basis. Floor and wall surfaces should be capable of being regularly cleaned. Waste materials are not permitted to accumulate in a workplace unless contained in suitable receptacles and rubbish should be collected regularly.

Waste should only be removed from site by approved and licensed waste contractors. Managers must assure themselves that the contractors are disposing of waste in an appropriate manner.

Equipment or other items must not be placed or permitted to accumulate in aisles or walkways. All spillages must be cleaned up immediately. Suitable warning signs will be erected when floors are washed.

Food Waste

Food waste is collected on specially adapted food waste pods which form part of the Acumen kerbside collection vehicles. Food is emptied into the pods in bags or wrapped in newspaper and is then transferred from the pod (which lifts up using an hydraulic arm) into a specially designed food waste skip with a sealed lid. Once the skips are full they are swapped over by a contractor. Special arrangements are in place to ensure that the food waste processing and the skip swap are carried out in a safe manner.

Smoking

Smoking is not permitted in offices or covered work areas. In July 2007, smoking became **illegal** in all enclosed workplaces in England. This includes **company vehicles** which are used by more than one person. Similar bans come in earlier in Scotland, Wales and Northern Ireland. No smoking signs are displayed and observed in all areas where there is a risk of fire or where smoking may pose an increased health risk to employees.

Organisation of Traffic Routes

Sites are planned and organised in such a way that pedestrians and vehicles can circulate in a safe manner. Traffic routes shall be suitable for the persons or vehicles using them, and be sufficient in number, position and size. In particular:

- Vehicles should be able to use the traffic routes without causing danger to the Health and Safety of persons at work nearby
- In busy areas such as the recycling yards used for unloading collected product, where other traffic and pedestrians may be in the area, a banksman must be used for all reversing manoeuvres. Guidelines for the safe use of banksmen are provided in the relevant section of the staff manual.
- A banksman must also be used when carrying out deliveries using the HIAB vehicle.
- Sufficient separation shall be provided between any vehicle traffic routes, and doors and gates from pedestrian traffic routes,

- Sufficient separation shall be provided between vehicles and pedestrians where they share the same traffic route.
- Additional care must be taken in areas such as docks premises where there is a large amount of vehicle and pedestrian activity.

All traffic routes shall be suitably signed, marked and illuminated where necessary for reasons of Health and Safety. Where concerns are raised due to the traffic activity of others on a shared site, this will be raised in writing with the relevant party.

Use of Vehicles

Company vehicles (including cars, lorries, fork lift trucks and Telehandlers) may only be operated by suitably qualified drivers who have been formally approved and appointed by the company. Licences will be checked to ensure that this is the case. The unauthorised operation / movement of any company vehicle by an employee will be treated as gross misconduct and be dealt with accordingly.

Workplace Transport

A significant amount of guidance and procedures is provided within the staff manual relating to reducing the risks associated with the movement of vehicles, FLT's etc around workplaces. These extend to the activities of Acumen drivers working at other peoples' premises where the risks associated with workplace transport may be unknown. This also includes addressing the risks associated with articulated vehicles coupling and un-coupling, and trailer swaps in public spaces.

Welfare Arrangements

Heating

During working hours a minimum of the statutory temperature shall be maintained in all offices and internal workplaces. Heating or cooling apparatus which releases injurious or offensive fumes inside the workplace shall not be used.

A sufficient number of thermometers will be provided to enable persons to determine the temperature within the building. Temperatures in workrooms should normally be at least 16 degrees Celsius, unless the work involves severe physical effort in which case it should be at least 13 degrees.

Where it is impractical to maintain these temperatures, local heating is provided. If, despite the provision of local heating, reasonable working temperatures cannot be maintained, suitable protective clothing (including thermal underwear where appropriate), hot drinks and rest facilities are provided.

Lighting

Suitable and sufficient levels of lighting is provided in every workplace, which is so far as is reasonably practicable by natural light. Where persons would be placed at risk from the failure of artificial light emergency lighting shall be provided.

Potentially hazardous areas such as stairways shall be properly lit and free from shadows that obscure the treads. External traffic routes and pedestrian crossing points shall be lit after dark.

Ventilation

Effective and suitable provision is made to ensure that every enclosed workplace is ventilated by a sufficient quantity of fresh air.

Sanitary Conveniences

Suitable and sufficient sanitary conveniences are provided at readily accessible places. The rooms containing them should be adequately ventilated, lit, maintained and regularly cleaned.

Separate accommodation is provided for men and women unless each toilet is located in a separate room, the door of which can be secured from the inside.

Washing Facilities

Washing facilities are provided in each toilet / changing room facility. Washing facilities shall be kept clean, warm, properly maintained and sufficiently lit. They shall be provided with a supply of running hot and cold water, soap (or other suitable hand cleaner) and means of drying.

Facilities for cleaning hands are provided on the vehicles for staff involved with the kerbside collection operation and the soiled linen collection operation. In addition, facilities for rinsing away any residue from the recycling products are provided on the kerbside collection vehicles.

Drinking Water

Drinking water is provided with suitable cups or other drinking vessels, unless the supply is from a jet from which people can easily drink. Drinking water supplies shall not be situated within toilet cubicles or close to urinals.

Storage of Clothing

Where applicable, suitable facilities are provided for employees to change and store clothing worn to and during work. The facilities for changing should be separate for men and women, readily accessible and contain adequate seating. Accommodation for clothing should be for clothes worn to work, for drying them and for work clothes when not being worn. This accommodation should be suitable and secure.

Rest Areas

Suitable facilities are provided to enable employees to rest and eat meals. The facilities should include seating, tables, means of preparing or obtaining a hot drink and, in certain circumstances, means of heating food. Suitable arrangements are provided to protect non-smokers from tobacco smoke.

Disabled access

Suitable facilities are provided to ensure that the disabled can access all Acumen's premises and that suitable on-site facilities are also available.

Personal Security

Lone Workers

Lone working should be avoided wherever possible. Where lone working cannot be avoided, risk assessments are undertaken to ensure the safety of staff. Appropriate measures, such as a tick sheet, checks, texts or regular telephone contact, will be implemented where the risk has been identified.

Vulnerable Workers

Where groups of staff are at risk of assault from the public, systems will be installed which either prevent the public from being able to make contact with staff, or automatically summons assistance from the police service.

Separate risk assessments will be conducted for women who are pregnant / breastfeeding and for young workers below the age of 18.

Maintenance

Buildings

Buildings are maintained as required to ensure the Health and Safety of all persons.

Particular attention is given to the condition of the walkways, lighting of stairways, operation of fire doors, etc., which if defective produce serious safety hazards. Where appropriate, suitable warning signs should be erected until the defect is rectified.

Vehicles

It is the responsibility of the location Managers and employees to ensure that company vehicles, including lift trucks, cars and goods vehicles, are maintained in a safe and roadworthy condition to ensure the safety of drivers and other persons who could be placed at risk from improper maintenance.

LGV drivers are responsible for visually inspecting goods vehicles on each occasion prior to taking to the road. Any defects during the inspection, or which become apparent during use, shall be entered in the defect book and a copy given to the office. Traffic staff must ensure unserviceable vehicles are not inadvertently taken into use before the defect has been remedied and all defects entered in defect books have been carried out. Records must be kept showing that the defect has been rectified, and this must tie back to the original defect raised.

Drivers are trained on the specific hazards associated with using the trailers and other operational equipment and, where an issue is identified through risk assessments, accident information or near miss reporting, appropriate remedial actions are put in place to address the particular risk identified.

Fork lift trucks and Telehandlers are checked daily by operatives and records maintained. Regular maintenance is also conducted by competent external suppliers.

Statutory Inspections by a competent person

Some plant and equipment has to be tested and inspected by law. Such equipment includes lifts, lifting equipment, gas appliances, electrical systems, pressure vessels and systems. All appropriate Acumen equipment is tested and inspected under PUWER (Provision and use of Work Equipment Regulations 1998) and, where appropriate, LOLER (Lifting Equipment and Lifting Operations Regulations 1998).

Where this type of equipment is used, records shall be maintained to ensure that tests and inspections are being undertaken to conform to statutory requirements.

Other inspections of equipment

Certain equipment must be inspected daily as part of good working practice at the depots. This includes the safety of tail-lifts on vehicles, restraining straps used to hold loads, lifting tackle and the stillages used by the kerbside collection teams. Staff must report any defects to their line manager and ensure that defective equipment is removed from use.

Contractors undertaking work on site

(see appendix 7 and 8)

General

The Company is responsible for the Health and Safety of all persons entering premises or sites under the direct control of the company. This includes any contractor working on the Company's premises, which will include any error or omission by them which jeopardises the Health and Safety of themselves or others.

Contractors shall be informed of any hazard present on site prior to commencing any work and must be provided with contractor information sheet (in appendix 7) prior to commencing work. Their host must give authority for them to undertake the task and set out particulars of any precautions which are imposed upon them.

A Permit to Work system (see appendix 8) is required for contractors carrying out electrical, building or hot work.

Major Works

If one or more of the following criteria listed below apply to a planned construction project, the project becomes notifiable under the Construction Design and Management Regulations 2007.

- a duration of more than 30 days
- a duration in excess of 500 person days

In such cases the company have specific duties which have to be discharged, and the Health and Safety consultant should be contacted for further guidance. For other building projects the Construction Design and Management Regulations 2007 also apply and additional advice should be sought from the H&S consultant.

Occupational Road Risk

Acumen acknowledges that driving on the road is an inherently dangerous activity which kills 2200 people in the UK every year. As a result, a large number of safety procedures are in place for drivers of LGV vehicles to ensure that:

- Drivers are properly trained and competent to drive
- Vehicles are properly maintained, with proactive and reactive maintenance and servicing arrangements in place
- Vehicles are not used beyond their useful operating life
- Drivers' working time and driving hours are monitored and controlled to ensure it is compliant with current legislation
- Procedures are in place for handling foreseeable situations on the road, such as breakdowns, accidents and emergencies
- Procedures are in place to advise drivers of their responsibilities relating to public safety and use of mobile telephones whilst driving
- Special arrangements are in place for the specific associated with the carriage of dangerous goods by road, in accordance with legislative requirements
- Special arrangements are also in place for staff employed on kerbside collection work, where they are at greater risk of being involved in a road accident as a pedestrian due to the nature of the work

As well as LGV drivers, other Acumen staff are required to drive distances in connection with their work. This normally involves managers and supervisors travelling to meetings with customers or within the company. The following guidelines are observed to ensure that they do not put themselves or others at risk whilst they are driving on business:

- Staff are responsible for ensuring that any vehicles used on company business are properly maintained, serviced and insured
- Driving licences are checked and recorded on the training matrix to ensure continuing permission to drive
- Staff are advised to plan to avoid early meetings and a long working day if it is going to be preceded and proceeded by a long journey, or consider an overnight stop where appropriate
- Staff are advised to consider alternative forms of transport for longer journeys, such as travelling by train or by air where appropriate
- Staff are required to be a member of a motoring organisation which can assist with a roadside breakdown quickly, to avoid the risk of injury whilst awaiting assistance
- Staff are required to follow the same guidelines for accidents, breakdowns and emergencies as provided for LGV drivers in the staff manual.
- Staff are required to observe all speed limits
- Staff are required to drive appropriately for the conditions on the road.

- Staff are required to comply with the law relating to the use of mobile telephones whilst driving.

Safe and legal use of Mobile 'Phones, Blackberries and other hand-held devices

Research shows that all phone calls – using any type of mobile - distract drivers from driving. Reaction times for drivers using a handheld phone are 30 per cent worse than for driving under the influence of alcohol at the legal limit. Therefore mobile phone-using drivers are being MORE reckless and dangerous than drunken drivers.

Drivers are also four times more likely to crash if you use a mobile phone while driving – whether or not you are using a hands-free device. Texting or reading emails is also extremely distracting and are illegal.

To minimise the risk of an accident, mobiles or Blackberrys should be turned off when driving. Messages can be checked when safely parked. If receiving calls is a necessity, a hands-free system MUST be used, but outbound calls which require holding the device are illegal. No texts or emails are to be read whilst the engine is running, even when stationary at traffic lights. This is illegal.

Remember, using a mobile whilst driving, even hands-free, significantly increases the risk of having an accident.

- No hand-held mobiles to be used whilst driving
- Hands-free kits may be used to receive incoming calls
- Outgoing calls **cannot** be made if the person is required to hold the handset to make the call
- Consider using voice activation to avoid the need to search for numbers in a directory (which causes much of the distraction resulting in an accident)
- Advise your supervisor/manager if your hands-free kit is not working
- Texting or reading texts whilst driving or while the engine is running is not permitted
- Reading emails whilst driving or while the engine is running is not permitted

Ringling drivers or colleagues

Acumen staff must not ring drivers or colleagues when you know they are driving without a hands free kit. This can lead to the company being prosecuted. Text them and ask them to call you when it is safe to do so. If you think they are driving, end the call.

When can I make or receive calls using a handheld mobile phone?

- You can call 999 or 112 if there is a genuine emergency where it is unsafe or impractical to stop.
- You can use a phone when safely parked (with the engine switched off and the keys out of the ignition) and when you are a passenger.

TRAINING AND CONSULTATION

New Starters

All new starters are given induction training, which will include instructions in the general safety arrangements relating to their job. Staff will be provided with a copy of the staff manual, which forms part of this training and covers many important safety aspects relating to their work. The provision of this information is recorded **on the skills matrix at each depot** and kept on file.

Existing Employees

Existing employees shall receive information and training in systems of work developed to minimise the risks of the hazards likely to be encountered in their work. These systems of work shall include any specific controls developed as a result of general and specific risk assessments.

Training will be provided at intervals as required and always following the installation of new plant and equipment or significant alteration to existing processes. This training is recorded **on the skills matrix at each depot**.

Transferees

Where staff are transferred, it should be ensured that they are provided with instructions in the general safety arrangements and any specific safety arrangements relating to their new task. Again the provision of this information shall be recorded **on the skills matrix at each depot**.

Driver CPC Training

All LGV drivers wishing to drive commercially after 9th September 2014 are required to have completed a minimum of 35 hours' Periodic Training by this date, in order to obtain their Driver Qualification Card (DQC). This demonstrates compliance with the on-going training requirement of the Driver Certificate of Professional Competence. This is a legal requirement, and Acumen will be checking that all drivers have obtained this qualification prior to the deadline. Drivers who do not hold the DQC will not be eligible to drive commercially beyond this date, and will not therefore be employed by the company as a professional driver after this time.

Skills matrix

A matrix of all qualifications held and training carried out will be retained at all sites, ensuring that any refresher training etc is planned and carried out before expiry of qualifications.

Temporary and Agency Staff

Provision for appropriate training of temporary staff is made in accordance with the Management of Health and Safety at Work Regulations 1999, regulation 15.

Temporary staff directly employed by Company shall receive appropriate, comprehensible training on Health and Safety. Agencies who supply drivers will receive appropriate training/documentation which they are required to pass on to all drivers supplied to work for Acumen. The Company will ask for evidence from the drivers that they have received suitable training prior to them being permitted to work.

Temporary staff, including agency staff, are required to wear appropriate PPE.

Consultation

In accordance with the Health and Safety (Consultation with Employees) Regulations 1996, Acumen will consult with the employee representative in good time when introducing any measures into the workplace which may substantially affect the Health and Safety of employees. Acumen will also consult with employees on the following:

- Making arrangements for appointing of safety representatives and competent persons
- Planning and organizing of Health and Safety training
- Likely risks and hazards within and arising from their work
- Matters of common concern regarding Health and Safety

Acumen will also provide sufficient information to employees as to the risks and hazards arising from their work.

SPECIFIC HEALTH AND SAFETY REGULATIONS

Display Screen Equipment

Health and Safety (Display Screen Equipment) Regulations 1992

General

The Display Screen Regulations specify the measures which the company has to take in the provision of equipment and protection of staff.

Guidance on the safe use of display screen equipment is available from the Health and Safety Representative at each site. Where employees are required to use display screen equipment for significant parts of the working day, assessments of their work stations and the risks to their health must be undertaken in accordance with the above regulations.

Assessment

A form for use when undertaking these assessments is contained in the appendix 6 to this policy. Assistance if required is available from the Health and Safety consultant. Where a risk is identified that cannot be controlled to a satisfactory level, the appropriate remedial actions will be put in place.

Hazardous Substances

Control of Substances Hazardous to Health (COSHH) 2002

General - Use

Wherever possible the use of hazardous substances should be avoided. Where the use of hazardous substances cannot be avoided, assessment of the use should be undertaken to ensure persons are not being placed at risk of injury.

Acumen does use a number of substances hazardous to health within its transport and warehousing operations.

Assessments

COSHH risk assessments will be carried out by the H&S consultant (or a nominee) where required. Safety data sheets are required to be available at point of use for all chemicals used by Acumen staff. Information, instruction and training for staff is also provided. Suitable PPE and signage will also be supplied.

Dangerous Substances

(Dangerous Substances and Explosive Atmospheres Regulations 2002)

General - Use

Wherever possible the use of dangerous substances should be avoided. Under the DSEAR Regulations these are substances which are classed as extremely flammable, highly flammable, flammable, explosive or an oxidising agent under the CHIP3 classification. Where the use of dangerous substances cannot be avoided, assessment of the use should be undertaken to ensure persons are not being placed at risk of injury.

Acumen has a small number of dangerous substances which are used within the transport and warehousing operations.

Assessments

DSEAR risk assessments will be carried out by the H&S consultant (or a nominee) where required. These will normally cross-reference to the COSHH assessment which also relates to the dangerous substance, but also takes into account the way the product is stored and used. Actions are taken to further reduce the risk of the dangerous substance if necessary. Information, instruction and training for staff is also provided.

Carriage of Dangerous Goods by Road

Acumen Halifax sub-contracts loads which are carried under the Carriage of Dangerous Goods by Road Regulations. Appropriate sub-contractors are selected; Acumen will check that they employ ADR drivers with the appropriate category licence and that they have an appointed DGSA.

Manual Handling

Manual Handling Operations Regulations 1992

General

Wherever possible the manual handling of loads should be avoided. Where manual handling cannot be avoided, assessments of the task should be undertaken to ensure persons are not being placed at risk of injury.

Information and guidance on the safe handling of loads is provided in the staff manuals. Specific training is also provided where required following risk assessment. Additional guidance relating to the safe pushing and pulling of loads is provided in the Healthtex section of the manual, as the drivers on this contract are required to push and pull roll cages containing clean and soiled bed linen.

Manual Handling Assessments

Where the manual handling of loads is significant and cannot be avoided, assessments of the task are required (see appendix 9, Manual Handling TILE risk assessment). Where appropriate a MAC (Manual handling Assessment Chart) assessment will also be carried out.

Remedial actions, which normally information, instruction and training for staff, are put in place following the manual handling risk assessments.

Noise

Control of Noise at Work Regulations 2005

General

Employees should not be exposed to elevated noise levels whilst at work. In areas where employees have to raise their voices to be heard, there may be a noise problem and an assessment of the noise levels should be undertaken. Ear protection shall be made available, with relevant signage, if levels exceed 80 dB (A). Ear protection is mandatory if noise levels exceed 85 dB (A).

Assessment

Where elevated noise levels are identified, the manager of the area should contact the H&S consultant and request that a noise assessment be undertaken.

Where the risk cannot be reduced to a satisfactory level remedial actions will be put in place to address the issues raised.

Noise levels exceed the second action level of 85 dB(A) at the ACUMEN DISTRIBUTION LTD can sorting facility at Burslem. Suitable arrangements have been put in place to address this.

Personal Protective Equipment
Personal Protective Equipment at Work Regulations 1992

General

Personal protective equipment (PPE) should only be provided where risks cannot be adequately controlled by other means. Where PPE is provided to protect employees against specified risks, it should be provided free of charge. Employees should be provided with information / training on the arrangements for issue, storage, safe use, maintenance and replacement of PPE.

Where agency staff are required to wear PPE, the agency should provide the appropriate equipment, unless alternative arrangements are made. No employee, permanent or temporary shall be permitted to undertake any task without wearing the appropriate PPE. Failure to wear PPE on the part of the employees shall evoke disciplinary action.

All drivers are required to wear a high visibility jacket and safety footwear at all times.

There are additional PPE requirements for the staff employed on kerbside collections work, which are explained in detail in the relevant section of the staff manual.

Assessment

With the exception of PPE issued in accordance with the requirements of specific regulations (e.g. noise, hazardous substances), assessments should be undertaken to ensure the PPE issued is suitable for its use. This will be done as part of the risk assessment programme.

PUWER – Provision and Use of Work Equipment)
(Provision and Use of work Equipment Regulations 1998)

General

Assessments are undertaken of all work equipment in accordance with the Provision and Use of work Equipment Regulations 1998. This includes Fork Lift Trucks.

Assessments

Assessments of new and existing work equipment should be undertaken to ensure that work equipment is suitable for its intended use and complies with the PUWER regulations. A specific PUWER assessment will be carried out on work equipment where this requirement has been identified as part of the generic risk assessment process.

Assessment will include the control measures (guards, emergency stops, interlocks, etc.) of work equipment are required to ensure that they also comply with the PUWER Regulations.

A PUWER risk assessment has been done on the can sorting machine at Burslem and suitable arrangements have been made to control the risks from this machine.

LOLER- Lifting Operations
(Lifting Operations and Lifting Equipment Regulations 1998)

Where required, assessments are carried out in accordance with the above regulations. A specific LOLER assessment will be carried out on lifting equipment where this requirement has been identified as part of the generic risk assessment process.

Lifting equipment not used to lift people will be checked every 12 months by a competent person and marked as required in the regulations. Acumen currently has no lifting equipment used for lifting people.

Electrical Safety

Electricity at Work Regulations 1989

Managers are responsible for the implementation of the requirements of the Electricity at Work Regulations 1989, by:

- the employment of only competent electricians for electrical work
- ensuring the electrical system and all equipment, including small appliances, are subject to planned annual maintenance and testing (PAT)
- keeping maintenance records
- using low voltage equipment wherever practical
- using appropriately designed, maintained and protected equipment in hazardous environments
- ensuring there is an effective locking off procedure for electrical isolation which includes arrangements for ensuring the system is dead before work commences defining the local procedure in relation to live work, and if appropriate, the provision of the necessary protective equipment. A permit to work is required for live working as this is only permissible where it is unreasonable in all the circumstances for the system to be dead. Suitable precautions are required to prevent injury; these must be discussed and documented with the contractor prior to the permit to work being issued.

Working at Height

Working at Height Regulations 2005

General – where working at height may apply

The legislation relating to working at height changed in 2005 and the previous “2 metre rule” has been removed. This means that many tasks which previously fell outside the specific legislation are now classed as “working at height”.

Wherever possible working at height should be avoided by Acumen staff. However, within the context of Acumen’s normal activities working at height may occur when drivers are required to access their unit to couple/un-couple trailers, standing on the trailer bed to assist with loading or unloading, or gaining access to the kerbside collections vehicle. With all these activities it is possible that they could fall and injure themselves.

Acumen must ensure:

- all work at height is properly planned and organised;
- those involved in work at height are competent;
- the risks from work at height are assessed and appropriate work equipment is selected and used; and
- equipment for work at height is properly inspected and maintained.

Assessments

Working at height risk assessments will be carried out by the H&S consultant (or a nominee) where required. This is done using the normal risk assessment format. Staff and drivers are issued with a set of guidelines to address this specific area of risk (in the staff manual) and are provided with information, instruction and training. This is to ensure that drivers are competent and able to plan working at height themselves.

Confined Spaces
(Health & Safety at Work Regulations 1999)
(Confined Space Regulations 1997)

General – Use

From time to time staff are required to enter the chambers used on the kerbside collection vehicles, for example to clear a blockage. This is kept to a minimum. This is classed as “Working in Confined Spaces” therefore additional safety procedures are required. A copy of the HSE Guidance “Safe Work in Confined Spaces” is held by the H&S Representative (available on request) and its guidance is observed.

Assessment

An initial assessment on the risk to staff of entering the chamber is carried out (as required under the Management of Health & Safety at Work Regulations 1999) and, where a risk of significant injury is identified, the Confined Space Regulations 1997 are observed.

As a result of this assessment, a set of procedures have been developed for use at Acumen, including training staff who are then authorised to carry out this work and emergency rescue procedures. Further information is supplied in the staff manual.

Asbestos at Work

Under Regulation 4 of the Control of Asbestos at Work Regulations 2002 companies have a duty to manage asbestos in non-domestic premises. This became law in May 2004.

To comply with this legislation Acumen will:

- find out whether the building contains asbestos, and what condition it is in
- assess the risk, e.g. if it is likely to release fibres
- make a plan to manage that risk

As all of Acumen’s current premises are leased or on the site of another company, this exercise will normally involve contacting the landlord/customer to ascertain what information is available and working with them to manage any risk identified.

Legionella

Acumen is aware of its duties to consider the risks from legionella that may affect staff or members of the public. Acumen will therefore work with its landlords and customers to ensure that suitable assessments have been carried out and any necessary remedial actions taken to reduce this risk.

ADDITIONAL HEALTH AND SAFETY INFORMATION

Stress at Work

The risk of employees being affected by stress is acknowledged by the Company. Information on reducing the risk of stress is made available and employees are encouraged to discuss stress-related issues with their line manager.

The Company acknowledges the 7 factors which can contribute to work-related stress, as follows:

- **Culture** – of the organisation and how it approaches work-related stress
- **Demands** – such as workload and exposure to physical hazards
- **Control** – how much say staff have in the way they do their work
- **Relationships** – covering issues such as bullying and harassment
- **Change** – how organisational change is managed and communicated within the organisation
- **Role** – whether the person involves their role within the organisation and whether the organisation ensures that the person does not have conflicting roles
- **Support, training and factors unique to the individual** – support from peers and line management, training for the person to be able to undertake the core functions of the job, and catering for individual differences

Additional information relating to stress at work is available via the Health and Safety consultant.

The Company also has a published Workplace Harassment Policy which documents how employees can raise issues relating to sexual or racial harassment and bullying, and how these will be resolved. All such issues can affect stress levels within an organisation.

Drugs and Alcohol

Alcohol and non-prescribed drugs can seriously affect the performance and judgement of an individual. Within our operation, this could pose a significant risk to the individual concerned and to other persons.

Any persons found to be under the influence of alcohol or non-prescribed drugs whilst at work will be sent home. Alcohol or drug related incidents, whilst on company business on or off the site will be treated as gross misconduct.

The company reserves the right to undertake drug/alcohol testing on a random basis to enforce the above policy and on specific occasions where a person's performance appears to be impaired. Failure to co-operate with a test will be treated as gross misconduct.

The Company has a published Drugs and Alcohol policy which contains more information on this subject.

Supervisors and managers are also required to attend drugs and alcohol awareness training.

HSE/EHO Inspectors

Right of Entry

HSE/EHO enforcement inspectors have wide ranging powers which are detailed in their warrants. An inspector must produce his warrant on request, without it he has no powers of entry or enforcement. It is the policy of Acumen to co-operate fully with HSE/EHO enforcement inspectors.

Powers of the Inspector

Inspectors are empowered to:-

- Enter premises and if resisted to enlist the support of a police officer.
- Inspect the premises.
- Require, following an incident, the plant is not disturbed.
- Take measurements and photographs although in the latter case it is usual to obtain permission first.
- Take samples of suspect substances.
- Require tests to be carried out on suspect plant or substances.
- Require the dismantling of a plant.
- Require those with possible knowledge relevant to his investigation to give it either verbally or in a written statement. The inspector has discretion to allow another to be present during questioning and the taking of a written statement.
- Inspect and take copies of books or documents required to be kept by safety legislation or others it is necessary for him to see them as part of his investigation but he has no right to examine documents for which legal privilege is claimed.
- Require assistance within a person's limits of responsibilities.

All persons are required to co-operate with inspectors and the most senior member of staff available should accompany him / her during the inspection.