



**LONDON RAILWAY LTD  
Trading As WASTESURE**

# **HEALTH & SAFETY POLICY**

THIS POLICY MUST BE REVIEWED BY THE FOLLOWING DATE

**09-05-2021**

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## General statement of intent – Health and Safety

This Statement has been prepared to define the way in which London Railway Limited Trading As Wastesure intends to manage, comply, and implement all aspects of Health and Safety, the associated regulations, legislation and client requirements.

London Railway Limited Trading As Wastesure recognise the importance of Occupational Health, Safety and Welfare in the successful operation of its activities.

London Railway Limited Trading As Wastesure believes that it is everyone's responsibility to participate in the occupational health safety and welfare systems and to contribute towards achieving our overall objectives of the highest standards of accident prevention while continually improving health and safety for employees and others.

It is the policy of all operations of London Railway Limited Trading As Wastesure to:

- Provide, so far as is reasonably practicable, safe methods/systems of work, safe working conditions and a healthy environment, in particular to:
- Ensure the Health & Safety of all employees in connection with the use, handling, storage and transport of any articles or substances.
- Provide and maintain safe access to and egress from any place of work under our control.
- Provide and maintain a working environment which is adequate as regards facilities and arrangements for the health and welfare of employees whilst at work.
- Strive for effective and continual improvement of its performance in managing occupational health and safety through implementing an H&S Management System.
- Communicate the contents of the policy to all employees with the intent that employees are made aware of their individual health and safety obligations.
- Provide training and / or instruction as may be necessary to personnel at all levels.
- Provide means of consultation on Health and Safety matters for all employees.
- Provide and display this policy and any such written instructions as are necessary to assist in the regulation of Health and Safety practices and operations.
- Provide a copy of the policy to interested parties.

Occupational health, safety and welfare is all employees' responsibility. Everyone is expected to contribute towards achieving the organisations, overall aims and objectives.

My aim is to encourage initiative and adopt best practice in a culture where employees and managers are aware of their individual health and safety responsibilities and are actively engaged and committed to improving standards of Health, Safety and Welfare and to maintaining our Management Systems and all necessary resources will be allocated in order to achieve this. I commit to providing all required resources, including financial resource, to ensure the full and proper implementation of this policy.

This policy is to be reviewed periodically to ensure that it remains relevant and appropriate to the organisation and takes account any changes in legislation or changes to company policy.

Mark Dunne - Director

Signed -

  
Mark Dunne (Feb 15, 2021 16:41 GMT)

Feb 15, 2021

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## General statement of intent – Quality

London Railway Limited Trading As Wastesure is committed to providing quality services and products for all of its projects regardless of the nature or size and to meeting the needs of all its customers by continually enhancing, reviewing & continually improving our quality systems with the intention of providing our clients with the quality of service they expect from a professional organisation.

With this in mind, it is our policy to work towards the realisation of the following objectives:

To provide a professional service.

Total client satisfaction measured using pre-determined Key Performance Indicators.

To be recognised by our clients as a professional organisation providing a quality service, therefore increasing the potential for further market development.

The communication and implementation of the quality policy, system and procedures at all levels of the organisation. Develop and maintain a culture that is self-critical, honest and transparent.

Maintain an adequately resourced Quality Assurance system that enables us to evaluate our strengths and weaknesses accurately and to respond to them accordingly.

Review our Quality Management system through an effective internal audit and management review process.

The company quality statement will be reviewed on an annual basis.

It is the intention of the Directors that the policies and procedures outlined and detailed within this policy are implemented on each and every project; adequate resources will, therefore, be made available to ensure this is achieved.

London Railway Limited Trading As Wastesure believes strongly that responsibility for quality assurance lies closest to the point of actual delivery - Therefore all personnel are responsible for ensuring compliance with the requirements of the Quality System which will be formally monitored by all members of Management and Supervision.

Mark Dunne - Director

Signed -   
Mark Dunne (Feb 15, 2021 16:41 GMT)

Feb 15, 2021


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## General statement of intent – Environmental

London Railway Limited Trading As Wastesure is committed to reducing its impact on the environment. We strive to reduce our environmental impact by:

- Continually monitor legislative changes and developments and make changes to our policy and practice to ensure compliance;
- Ensure the responsible use of energy (in our case, principally electricity) throughout our business by conserving energy wherever possible, monitoring and improving energy consumption and efficiency on a regular basis, and encouraging best practice within our company and by our business associates;
- Conserve natural resources by reusing and recycling packaging and stationery materials, purchasing recycled materials where appropriate, and using recyclable packaging and other materials wherever possible;
- Be a responsible member of the local business community and its immediate area in the way that we impact on the environment that we share, and to act promptly and effectively to correct any problems or incidents that might affect the environment or the health or safety of our staff, of our business neighbours or of the inhabitants of the area;
- Utilise products that we know to be safe to use, energy-efficient in operation, protective of the environment, and that can be reused, recycled or disposed of safely;
- Make all employees aware of this policy and their responsibilities for environmental issues;
- Undertake regular and comprehensive self-assessments of our compliance with this policy and report annually to the management meeting;
- Review and update this policy on an annual basis, or more frequently if required.
  - In practical terms, this includes,
- Non-essential electrical equipment will be switched off whenever possible.
- In particular, the Office lights will be turned off overnight, and over weekends
- Office heating will be turned down to acceptable and staff-agreed levels.
- All procurement of goods or services should consider the environmental impact of the product purchased, its packaging and delivery method. Where it is sensible, we will use second-user or recycled equipment.
- We will actively look for practical public transport alternatives for any trip,
- We will aim to share lifts whenever two or more staff are visiting the same site and have a similar route or part of route,
- We will attempt to reduce travel in general by the careful planning of meetings with clients and travelling to a site in groups.
- All Paper, Plastics and Glass consumed within the office will be recycled, separately from other refuse. Any confidential paper matter will be shredded before recycling.

Mark Dunne - Director

Signed -   
 Mark Dunne (Feb 15, 2021 16:41 GMT)  
 Feb 15, 2021

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## General statement of intent – Equality and Diversity

London Railway Limited Trading As Wastesure is committed to eliminating discrimination and encouraging diversity amongst our workforce so that each employee feels respected and able to perform to the best of their abilities.

The practice acknowledges and promotes the differences between individuals and values a diverse contribution of skills, abilities and experience.

To that end, the purpose of this policy is to provide equality and fairness for all in our employment and business operations, and not to discriminate on the grounds of gender, marital status, race, ethnic origin, colour, nationality, national origin, disability, sexual orientation, religion or age.

We oppose all forms of unlawful and unfair discrimination.

It is practice policy to ensure that all members of the public, business partners, and all employees, whether part-time, full-time or temporary, will be treated fairly and with respect.


Selection for employment, promotion, training or any other benefit will be on the basis of aptitude and ability. All employees will be helped and encouraged to develop their full potential, and the talents and resources of the workforce will be fully utilised to maximise the efficiency of the organisation.

The Directors commit to:

- Creating an environment in which individual differences and the contributions of all our staff are recognised and valued.
- Providing employees with a working environment that promotes dignity and respect to all. No form of intimidation, bullying or harassment will be tolerated.
- To make training, development and progression opportunities available to all staff.
- Recognise that equality in all aspects of our activity is good management practice and makes sound business sense.
- Review all our employment practices and operational procedures to ensure fairness.
- Ensure that the practice observes as far as possible all relevant codes of practice and complies with its obligations under current regulations and legislation.

Breaches of our equality policy will be regarded as misconduct and could lead to disciplinary proceedings.

Mark Dunne - Director

Signed -   
 Mark Dunne (Feb 15, 2021 16:41 GMT)  
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## Organisation and Managerial Responsibilities

The company is owned and managed by Mark Dunne who is directly responsible for Health and Safety matters within the company. The responsible person will seek external assistance where necessary to ensure that the company meets both its statutory obligations and the objectives laid down in this Health & Safety Policy.

The organisation of the workforce is the responsibility of the Company Directors, who remain responsible for ensuring that the company's Health & Safety Policy and associated procedures are implemented by all site operatives.

Day to day management of the company's operations is the responsibility of Mark Dunne who may be supported by Works Supervisors, each responsible for one site or customer premises. Depending on the size and nature of the site, the responsible person may be supported by one or more supervisors responsible for the direct supervision of the company operatives.

## Faction Health and Safety Group Responsibilities

Faction Health and Safety Group are contracted as the competent health and safety advisor for London Railway Limited Trading As Wastesure in accordance with regulation 7 of the management of health and safety at work regulations 1999.

Faction Health and Safety Group are responsible for working with London Railway Limited Trading As Wastesure based on the information provided by London Railway Limited Trading As Wastesure and advising on measures to take in accordance with legislation, legal reference documentation; HSE issued guidance documentation and industry best practice.

Faction Health and Safety Group provide this service to London Railway Limited Trading As Wastesure for a period of 12 months from 04.01.2021.

## Employee/Contractor Responsibilities

All company employees and contractors have a statutory duty to take reasonable care in relation to their own personal health & safety, and the health and safety of any other person who may be affected by their acts or omissions.

Therefore, it shall be the duty of all employees/Contractors whilst at work:

- To take reasonable care for the health & safety of themselves and others, that may be affected by their acts or omissions at work.
- To co-operate with the employer to ensure compliance with all the company Health & Safety policies and procedures.
- To refrain from intentional or reckless interference with equipment and/or systems provided in the interest of Health, Safety and the Environment.
- To co-operate with management when required on such things as accident prevention and all procedures with regard to Health, Safety and the Environment as set out in the Health & Safety at Work etc. Act 1974, the Environmental Protection Act 1990 and all associated Regulations and approved code of practices.
- To maintain good standards of housekeeping in our premises and on client premises.
- To report any accident or incident including near-misses (whether or not personal injury results) to the office.
- To report any defects in equipment without delay to their immediate Supervisor and not to attempt repairs which they have not been authorised and specifically trained and competent to undertake.
- To ensure that no potentially hazardous item, substance or machine is brought on to the site or used without the prior knowledge and authority of their immediate Supervisor.

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- To use and if applicable, wear any item of Personal Protective Equipment. It is a requirement of law that any equipment supplied for safety must be used, and when not in use, it is properly cleaned, stored and maintained.
- To undergo any Health, Safety, Environmental and operational training deemed necessary by the company.

## Staff Consultation

If an employee or contractor becomes aware of any potential breaches of health & safety legislation or unsafe working practices, they must notify the Site Supervisor who will duly report to the Company Directors.

If an employee or contractor feels that health & safety procedures may be improved, for example, by use of alternative equipment, they are encouraged to discuss any suggestions directly with the company management.

## Specific Safety Functions and Named Responsibilities

Safety function	Person responsible
Overall responsibility	Company Director/s
Accident and incident investigation	Company Director/s
Provision of a safe system of work	Company Director/s
Provision of safe to use electrical appliances	Company Director/s
Providing information, instruction training and Supervision on projects	Company Director/s
Ensuring sufficient first aid provisions are available on each site and inspected accordingly	Company Director/s
Ensuring sufficient firefighting provisions are available on each site and inspected accordingly	Company Director/s
Liaise with Site Management and provide support and progress reports to Company Director as required	Works Supervisors
Reporting any issues	All employees and contractors
Taking care of their own health and safety and that of others who may be affected by their acts or omissions	All employees and contractors
Pre-Use equipment inspections	All employees, contractors and users of the equipment
Inspection of all equipment to protect workers from the risks associated with work at height	All employees, contractors and users of the equipment
Provide health and safety advice and support as required by London Railway Limited Trading As Wastesure	Faction Health & Safety Group Ltd

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## Accident/Incident Reporting Procedure

London Railway Limited Trading As Wastesure accept our duty under the current edition of the Reporting of Injuries, Diseases and Occurrences Regulations (RIDDOR) to report certain injuries and incidents to the enforcing authority. The purpose of this procedure is to ensure that this duty is fulfilled and that all accidents are investigated.

### Incident Reporting

If you are injured in our offices when travelling between sites, the injury should be recorded in our Accident Book, which is kept in the Office. The completed page of the book should then be removed and given to the Contracts Manager, who is responsible for ensuring that completed reports are kept secure. The injured person may take a copy of the page from the Accident Book if they wish.

If any company employee is injured whilst working on-site, it shall be recorded in the site Accident Book held by the Client. The IP or delegate should then ring London Railway Limited Trading As Wastesure offices to ensure that it is recorded in our Accident Book, as above.

Where London Railway Limited Trading As Wastesure are the Sole Contractor, the Site Manager or most senior person on site is responsible for ensuring that all accidents are recorded in the Accident Book.

### Accident Investigation

It is our policy to investigate all accidents, dangerous occurrences and near misses. Whether the consequence of an incident is a serious injury, minor injury or no injury at all, lessons can be learnt to prevent the same sequence of events reoccurring. The implementation of corrective action to a near-miss incident can, therefore, prevent a repeat of the incident that may have more serious consequences in the future.

The Company Director is responsible will investigate all accidents. Incidents will be investigated by completing a copy of the Accident/Incident Report Form and measures necessary to prevent recurrence will be identified. This task may be delegated to members of management. For high potential accidents or reportable accidents or incidents as stipulated by RIDDOR London Railway Limited Trading As Wastesure shall request additional support from Faction Health and Safety Group as required.

### Subcontractor Arrangements for accidents on site

Subcontractors will enter the detail of any accidents requiring first aid treatment in the site accident book. They will report any accidents to their own employees, to the HSE in line with their own company procedures, but will provide site management with copies of such details, along with details of any investigations undertaken and measures applied to prevent a reoccurrence. Copies of these details will be forwarded to Head Office.

### Reporting accidents and incidents to the enforcing authority

The Company Director is responsible for reporting to the Incident Contact Centre (ICC) any injury, disease or dangerous occurrence covered by RIDDOR. If he is not sure whether an incident should be reported, they will contact Faction Health and Safety Group for advice.

It is London Railway Limited Trading As Wastesure's policy that verbal communication regarding any accident is expressly forbidden. Any request for information by pertinent and relevant parties must be addressed to the Policy Holder in writing who will make our official response. This statement relates to both reportable and non-reportable accidents/ incidents. When an accident or dangerous occurrence takes place, it will fall into one of the following categories:

### Minor accident to an Employee

- a) ensure details have been entered in the accident book
- b) where an employee is incapacitated from work for more than three consecutive days (excluding the day of the accident but including any days which would not have been working days) because of any injury, complete internal report form and send directly to the safety officer

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- c) If the injured employee is admitted to hospital and is an in-patient for more than twenty-four hours, the accident becomes specified as 'major injury' and must be notified as described under that category below.

## Minor accident to others

- a) Complete the accident book and accident report form as detailed above.  
b) Inform the person's workplace and notify their employer.

## Specified Injury

- a) Cease works on-site immediately.  
b) Include information within the Sire accident book  
c) Inform Director with overall responsibility for health and safety who will notify HSE and obtain written reports from all persons on site.  
d) Comply with requirements of RIDDOR (Reporting of Injuries, Disease, And Dangerous Occurrence)  
e) A record must be kept by employers of all notifiable/industrial diseases, form F2508A  
f) Where an employee has suffered an injury as a result of a reportable accident or dangerous occurrence which is the cause of health problems within one year of the date of the incident, the London Railway Limited Trading As Wastesure shall inform the enforcing authority in writing as soon as it comes to our knowledge.

The following injuries are reportable:

## Fatality or Specified Injuries

- Fractures, other than to fingers, thumbs or toes;
- Amputation;
- A dislocation of the shoulder, hip, knee or spine;
- Loss of sight (temporary or permanent);
- Chemical or hot metal burn to the eye or any penetrating injury to the eye;
- Injuries from an electric shock or electrical burn leading to unconsciousness or requiring resuscitation or admittance to hospital for more than 24 hours;
- Any other injury: leading to hypothermia, heat-induced illness or unconsciousness; or requiring resuscitation; or requiring admittance to hospital for more than 24 hours;
- Unconsciousness caused by asphyxia or exposure to a harmful substance or biological agent;
- Acute illness requiring medical treatment, or loss of consciousness arising from absorption of any substance by inhalation, ingestion or through the skin;
- Acute illness requiring medical treatment where there is a reason to believe that this resulted from exposure to a biological agent or its toxins or infected material.

All of the above should be notified to the HSE at the earliest opportunity by telephone for death, via the online notification system for reportable/Specified injuries.

## Over 7-Day Injury

If there is an accident connected with work (including physical violence) that is not a specified injury but results in a person being away from work or unable to do their normal work for more than seven days (including non-work days), the HSE must be notified by the employer within 15 days. We require a copy of the HSE notification report.

## Members of the public

An injury to a member of the public, which results in them being killed or taken to a hospital must be reported to the HSE at the earliest opportunity.

## Reportable Dangerous Occurrences

Most relevant Office based reportable dangerous occurrences include:

- Electrical short circuit or overload causing fire or explosion;

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- Accidental release of biological agent likely to cause severe human illness;
- Explosion or fire causing suspension of normal work for over 24 hours;
- Accidental release of any substance which may damage health.

## Reportable/Industrial diseases

If a doctor notifies the employer that an employee is or has been suffering from work-related disease, then the employer must notify the HSE at the earliest opportunity.

Examples of diseases that must be reported are:

- Certain poisonings;
- Some skin diseases such as occupational dermatitis, skin cancer, chrome ulcer, oil folliculitis/acne;
- Lung diseases including occupational asthma, farmer's lung, pneumoconiosis, asbestosis, mesothelioma;
- Infections such as leptospirosis; hepatitis; tuberculosis; anthrax; legionellosis and tetanus;
- Other conditions such as occupational cancer; certain musculoskeletal disorders; decompression illness and hand-arm vibration syndrome.

## Near Miss Reporting

A 'near miss' is an unplanned event that did not result in injury, illness, damage or product loss - but had the potential to do so.

All Employees and Sub-Contractors must report 'near miss' incidents as soon as practicable following the incident.

The near-miss report form available from the site office should be used to report the incident. As much detail as possible should be provided to ensure a thorough investigation can be carried out. When completed, the form must be returned to the office.

The Office Manager or Most Senior person on site will collate the forms, discuss with the Company Director and carry out any required investigations.

For all other "Near Miss" incidents, the Contracts Manager will collate the forms and carry out any required investigations.

## Civil Claims

London Railway Limited Trading As Wastesure acknowledge that employees and others (contractors, visitors and members of the public) who may be affected by our activities have the right to make claims for compensation, where they consider that an injury is the result of negligence on our part. Such claims will be dealt with on our behalf by our Employer and Public Liability insurer provider.

Following the Woolf report, there is now a 'fast track' procedure that allows for small claims to be settled quickly. This procedure requires us to forward to our insurer any letter from a solicitor, alleging negligence on our part, within 21 days of receipt and providing evidence in our defence. The insurer then has 90 days to respond to the claimant's solicitor. To enable us, and our insurer, to comply with the requirements of the 'fast track procedure', the following procedures must be followed:

- All incidents must be recorded, investigated and, where necessary, under RIDDOR, reported to the enforcing authorities as described in the Incident Reporting Procedure contained in this Policy;
- Any person receiving a letter from a solicitor must forward this immediately to the Managing Director;
- The Company Director will unless he instructs someone else to act on his behalf, forward the solicitor's letter to our insurer along with any evidence in our defence;
- Direct correspondence with the claimant and/or his/her solicitor is strictly forbidden, as this may prejudice our defence;
- All correspondence relating to the claim must be forwarded to the Company Director immediately following receipt.

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It is our responsibility to provide evidence in defence. Therefore, the Company Director is responsible for collating an 'Evidence File' for all reportable injuries and incidents and any other accidents where a claim is foreseeable. We may take a commercial view on minor accidents, balancing the possibility of a claim being brought against the cost of accident investigation.

Evidence may take the form of the following documents, but this is not an exhaustive list:

- Accident Book entries;
- Statements from the injured person(s), witnesses, supervisors and first aider. These should be signed and dated and contain only statements of fact, not supposition;
- Copy of the accident/incident investigation report, with any photographs and diagrams;
- Pre-and post-accident risk assessments;
- Copies of any written safety instructions given to the injured person(s);
- Records of any personal protective equipment issued to the injured person(s);
- Copies of any test certificates and/or records of maintenance and inspection of any equipment involved in the incident;
- Any disciplinary evidence relating to the occurrence;
- Copies of any statutory reporting document forwarded to the Enforcing Authority (F2508 or F2508A);
- Copies of any correspondence from the enforcing authority relating to the incident.

No evidence may be sent to our insurers without the permission of the Company Director.

A claim may be brought by an employee whether or not the accident has been recorded in the Accident Book or whether he/she has taken time off work as a result.

### **Key Documentation to comply with this Policy**

Accident & Incident Internal Audit pro-forma

Accident and Near Miss Report

Injured Person Report

Human Factor Assessment

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## Alcohol, Drugs and Substance Misuse

The consumption of alcohol is an accepted part of social life and is usually a personal matter. However, the subject of alcohol, drugs and substance misuse and how these stimulants can impair the performance, safety and interpersonal work relations is a matter for employers.

To ensure that alcohol, drugs and substance misuse is managed within the workplace, that activities are undertaken safely and that our policy will be clearly understood throughout the company, we will:

- Effectively communicate our strategy on alcohol, drugs and substance misuse in the workplace;
- Train supervisors and managers to identify employees they suspect of misusing alcohol, drugs and substances;
- Develop a system for dealing with employees who are experiencing problems with alcohol, drug and substance misuse;
- Provide employees with adequate information, instruction and training to enable them to perform their work safely;
- Ensure that adequate resources are made available to fulfil the requirements of this strategy; and
- Review this policy at least annually but more frequently if significant changes occur

To fulfil our responsibilities as outlined above, London Railway Limited Trading As Wastesure will:

- Make our alcohol, drugs and substance misuse strategy widely available in the workplace and ensure that all staff are taken through it at induction;
- Identify and deliver appropriate training for managers and supervisors on alcohol, drugs and substance misuse awareness and the actions to take if an employee is suspected of misuse;
- Ensure that managers and supervisors carry out a detailed investigation on each individual case as they occur by taking account of the person involved, the type of work being performed, and the risk created by individuals being affected by alcohol, drug and/or substance misuse and that they complete a risk assessment if appropriate; and
- Periodically assess accident records to identify any trends where alcohol, drugs or substance misuse may be a contributory factor and ensure that serious injuries are appropriately reported.

### Key Documentation to comply with this Policy

Alcohol, Drugs and Substance Misuse internal audit pro-forma

Company Name	Signed by	Review due date
London Railway Limited Trading As Wastesure	Mark Dunne	04.01.2022

## Consultation and Communication with Employees

The aim of this communication and consultation policy is to ensure, so far as is reasonably practicable, the health, safety and welfare of our employees while they are at work, and to comply with all relevant legislation, including:

- Health and Safety at Work etc. Act 1974
- Management of Health and Safety at Work Regulations 1999
- Safety Representatives and Safety Committees Regulations 1977
- Health and Safety Information for Employees Regulations 1989 (as amended)
- Health and Safety (Consultation with Employees) Regulations 1996
- The Equality Act 2010.

To comply with the legislation and ensure that this policy is clearly understood throughout the company and that all activities are undertaken safely, in accordance with the risk assessment process, we will:

- Establish a Health and Safety Committee if at least two Appointed Safety Representatives request this, in writing. A committee shall be set up within three months of any written request; and
- Communicate and consult with our employees or their safety representatives to ensure that they fully understand the company's health and safety policies and procedures, as well as the information they require to carry out their duties safely;
- Ensure appropriate means of communication are used;
- Ensure that elected safety representatives and appointed safety representatives receive any necessary training to carry out their roles effectively;
- Meet the costs of any necessary training, including travel and subsistence costs;
- Ensure that representatives are given reasonable time off, with pay, to carry out their functions;
- Set up a safety committee if at least two appointed safety representatives request this, in writing. A safety committee shall be set up within three months of any written request;
- Ensure the membership of the Health and Safety Committee (if established) consists of management and employee representatives and is chaired by a person with authority.
- 
- Ensure that adequate resources are made available to fulfil the requirements of this policy; and
- Review and, where appropriate, revise this policy at least annually but more frequently if significant changes occur.

### Open Door Policy

Management at all levels is encouraged to adopt an open-door policy on any matter regarding Health and Safety. Employees are encouraged to voice concerns and to take positive actions to prevent unsafe acts or conditions occurring.

The telephone numbers of supervisors, contracts managers and directors are widely published and freely available, and employees are free to contact them at any time through the chain of command.

It is hoped that by senior management showing clear and visible commitment to Health and Safety, other employees will regard it with the same importance, thus creating a positive Safety ethos throughout the company.

### Safety Alerts

Safety alerts are regularly issued on Health and Safety related topics. They are prepared with a view to keeping employees and subcontractors abreast of changes in Health and Safety legislation, changes in company policy or details of recent accident, incidents or HSE campaigns etc.

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## Training

All levels of training are used as a forum for discussing Health and Safety matters. On-site induction training and toolbox talks are used to convey the safety message on-site, while regular safety update training offers an ideal opportunity to exchange views.

## Information

Employees are provided with such information as is necessary to enable full participation in health and safety consultation. Such information will be provided by the means most appropriate to the matters and circumstances concerned. These may include, but will not be limited to, the following:

- Conversations with individuals;
- Staff meetings/team meetings;
- Information displayed on notice boards;
- Letters attached to payslips/remittance slips.

We encourage all employees to take an active interest in health and safety matters and welcome positive suggestions for improvement. If employees would like to raise a matter for discussion, this should be brought to the attention of the Company Director.

## Key Documentation to comply with this Policy

Consultation and Communication with employees internal audit pro-forma

Company Name	Signed by	Review due date
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## Coronavirus / Covid 19

London Railway Limited Trading As Wastesure recognise that Coronavirus / Covid 19 is a hazard that poses a significant risk to our workers and our industry has needed to react to control the cross contamination of this virus.

We have developed this policy so that all Employees (and sub-contractors working under our control) understand and respect how London Railway Limited Trading As Wastesure will manage and maintain Coronavirus / Covid 19 routinely as part of our work, this includes social distancing at work along with arrangements for travelling to and from work.

London Railway Limited Trading As Wastesure shall comply with the requirements of the "Site Operating Procedures" document issued by the Construction leadership Council & any additional requirements stipulated by the Principal Contractor on sites where we are contracted to work.

All Operatives will be required to attend a Covid-19 toolbox talk and specific company Covid-19 induction.

### Training and Instruction

All London Railway Limited Trading As Wastesure Employees (and sub-contractors working under our control) will attend a Coronavirus / Covid 19 based toolbox talk which will be delivered by either the Works Supervisor or the Company Director.

Additional training may be provided by Principal Contractors in the form of site specific Covid 19 based induction for their site.

### Risk Assessment and Method Statements

All London Railway Limited Trading As Wastesure Risk Assessments and Method statements will include details on how contact with Coronavirus / Covid 19 pathogens will be reduced to an acceptable level.

Where required, we will add any site-specific information as required by the Principal Contractor following a review of our document.

### Resources

As Coronavirus / Covid 19 is an ever-changing situation, London Railway Limited Trading As Wastesure shall complete a daily check of the current status from the following sources

Covid 19: Guidance for employees, employers and businesses:

<https://www.gov.uk/government/publications/guidance-to-employers-and-businesses-about-covid-19>

Site Operating Procedures: <https://www.constructionleadershipcouncil.co.uk/news/>

Following the identification of change in work practices, this will prompt a review of our risk assessments and method statements to ensure that they are in line with the latest guidance and instruction.

### Stop the Job authority

In the event that any job cannot be completed safely, or if it is felt that other workers (Including co-workers, other workers on site, the Principal Contractor or Client) are not complying with site and company rules related to Coronavirus / Covid 19, they have full permission of London Railway Limited Trading As Wastesure to stop the job and report this to the Company Director.

We will support any person of this action in line with our whistleblowing policy

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## Data Protection and Online Security

London Railway Limited Trading As Wastesure shall protect restricted, confidential or sensitive data from loss to avoid reputation damage and to avoid adversely impacting our clients. The protection of data in scope is a critical business requirement, yet flexibility to access data and work effectively is also critical.

It is not anticipated that this technology control can effectively deal with the malicious theft scenario, or that it will reliably detect all data. Its primary objective is user awareness and to avoid accidental loss scenarios. This policy outlines the requirements for data leakage prevention, a focus for the policy and a rationale.

### Personal Data

Personal data is defined by the Data protection Act 2018 as data which relates to a living individual who can be identified from that data or from that data and other information which is in the possession of, or is likely to come into the possession of, the data controller, and includes any expression of opinion about the individual and any indication of the intentions of the data controller or any other person in respect of the individual.

In accordance with the Data protection Act 2018, London Railway Limited Trading As Wastesure shall ensure that Personal Data shall be:

- Processed fairly and lawfully.
- Obtained only for specified and lawful purposes and shall not be processed in any manner which is incompatible with those purposes.
- Adequate, relevant and not excessive with respect to the purposes for which it is processed.
- Accurate and, where appropriate, kept up to date.
- Kept for no longer than is necessary for light of the purposes(s) for which it is processed.
- Processed in accordance with the rights of data subjects under the Data Protection Act 2018.
- Protected against unauthorised or unlawful processing, accidental loss, destruction or damage through appropriate technical and organisational measures. And,
- Kept secure to prevent the transfer to a country or territory outside of the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

In accordance with the Data protection Act 2018, London Railway Limited Trading As Wastesure commit to ensuring that all data subjects have the right to:

- Access a copy of their personal data held by the Company by means of a Subject Access Request.
- Object to any processing of their personal data that is likely to cause (or that is causing) damage or distress.
- Prevent processing for direct marketing purposes.
- Object to decisions being taken by automated means (where such decisions will have a significant effect on the data subject) and to be informed when any such decision is taken (in which case the data subject has the right to require the data controller (by written notice) to reconsider the decision.
- Have inaccurate personal data rectified, blocked, erased or destroyed when requested.
- Claim compensation for damage caused by the Company's breach of the Act.

### Data protection procedures

London Railway Limited Trading As Wastesure shall ensure that all of its employees, agents, contractors, or other parties working on behalf of the

Company comply with the following when working with personal, sensitive or data relating to other Clients or Customers:

- All emails containing data must be encrypted.
- Data shall only be transmitted over secure networks with a firewall installed – transmission over unsecured networks is not permitted in any circumstances.
- Data may not be transmitted over a wireless network if there is a wired alternative that is reasonably practicable

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- Data contained in the body of an email, whether sent or received, should be copied from the body of that email and stored securely. The email itself should be deleted. All temporary files associated therewith should also be deleted.
- Where Personal data is to be transferred in hardcopy form, it should be passed directly to the recipient or posted using a track and trace service with a signature required from the named recipient.
- No personal data may be shared informally, and if an employee, agent, sub-contractor, or other party working on behalf of the Company requires access to any personal data that they do not already have access to, such access should be formally requested
- Data must be handled with care at all times and should not be left unattended or on view to unauthorised employees, agents, sub-contractors or other parties at any time.
- If data is being viewed on a computer screen and the computer in question is to be left unattended for any period of time, the user must lock the computer and screen before leaving it.
- Any unwanted copies of data (i.e. printouts or electronic duplicates) that are no longer needed should be disposed of securely. Hardcopies should be shredded, and electronic copies should be deleted.
- No data should be stored on any mobile device (including, but not limited to, laptops, tablets and smartphones), whether such device belongs to the Company or otherwise.
- All personal data stored electronically should be backed up and encrypted.

## Password Management

- All passwords used to protect personal data should be changed regularly and should not use words or phrases that can be easily guessed or otherwise compromised.
- All passwords must contain a combination of uppercase and lowercase letters, numbers, and symbols.
- Under no circumstances should any passwords be written down or shared between any employees, agents, contractors, or other parties working on behalf of the Company, irrespective of seniority or department. If a password is forgotten, it must be reset using the applicable method.

## Organisational Measures

London Railway Limited Trading As Wastesure Have appointed Mark Dunne as its Data Protection Officer with the specific responsibility of overseeing data protection and ensuring compliance with this Policy and the Data protection Act 2018.

The Data Protection Officer shall ensure that:

- All employees, agents, contractors, or other parties working on behalf of the Company are made fully aware of both their individual responsibilities and the Company's responsibilities under the Act and under this Policy and shall be provided with a copy of this Policy.
- Only employees, agents, sub-contractors, or other parties working on behalf of the Company that need access to and use of personal data in order to carry out their assigned duties correctly shall have access to personal data held by the Company.
- All employees, agents, contractors, or other parties working on behalf of the Company handling personal data will be appropriately trained to do so.
- All employees, agents, contractors, or other parties working on behalf of the Company handling personal data will be appropriately supervised.
- Methods of collecting, holding and processing personal data shall be regularly evaluated and reviewed.
- The Performance of those employees, agents, contractors, or other parties working on behalf of the Company handling personal data shall be regularly evaluated and reviewed.
- All employees, agents, contractors, or other parties working on behalf of the Company handling personal data will be bound to do so in accordance with the principles of the Act and this Policy by contract.

## Access to personal data (Subject access request)

Any Person that London Railway Limited Trading As Wastesure hold personal data about may make a subject access request at any time to find out more about the information that London Railway Limited Trading As Wastesure hold about them.

Subject access requests should be made in writing and addressed to the company director and should be clearly identified as a subject access request.

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The subject access request must make it clear whether it is the person themselves that is making the request or whether it is a person acting on his or her behalf. In either case, proof of identity must be provided. If the subject access request is made on another's behalf, the individual making the request must provide clear evidence of their authorised capacity to act on behalf of the data subject.

Upon the receipt of the Subject access request, London Railway Limited Trading As Wastesure shall have a maximum period of 40 calendar days within which to respond fully, although an acknowledgement should be received within 10 working days.

The following information will be provided with:

- Whether or not the Company holds any personal data on the Person requesting the Subject access request.
- A description of any personal data held on the person.
- Details of what that personal data is used for.
- Details of how to access personal data and how to keep it up to date.
- Details of any third-party organisations that personal data is passed to. And,
- Details of any technical terminology or codes.

## Notification to the information commissioner's office

As a data controller, the London Railway Limited Trading As Wastesure is required to notify the Information Commissioner's Office that it is processing personal data.

Data controllers must renew their notification with the Information Commissioner's Office on an annual basis. Failure to notify constitutes a criminal offence.

Any changes to the register must be notified to the Information Commissioner's Office within 28 days of taking place. The Data Protection Officer shall be responsible for notifying and updating the Information Commissioner's Office.

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## Display Screen Equipment

Display screen equipment' (DSE) is used to describe not only the visual display unit (VDU) of a computer but also the other computer equipment and the workstation where it is used, i.e. the desk, work surface, chair, input devices, software, printer and document holder.

The risk posed to office staff using DSE shall be assessed and controlled in accordance with the Health & Safety (DSE) Regulations and the Management of Health & Safety at Work Regulations 1999. The aim of such assessments is to prevent work-related upper limb disorders (WRULD), lower back problems, eyestrain, stress and repetitive strain injury (RSI).

Any employee that works with DSE for more than two hours per day, when averaged over a four-week period, will be classed as a "DSE User". All "DSE Users" will be provided with an eyesight test by a competent person, free of charge.

Where an eyesight test identifies that a "DSE User" requires special corrective appliances to work with DSE, we will contribute to the cost of providing such appliances. If this applies to you, you should contact the Company Director for details.

All workstations should be subject to a DSE assessment, this should be carried out by a competent person, and the findings of the assessment shall be communicated to those affected.

All employees are encouraged to break up the time spent working with DSE by working away from the screen for 10 minutes after 60 minutes of continuous use and If any employee you experience visual difficulties, headaches or pains in the upper limbs or shoulders when working with DSE you should bring this to the attention of the Managing Director.

To ensure that the use of Display Screen Equipment (DSE) will be undertaken safely and that our policy will be clearly understood throughout the company, we will:

- Identify all users of DSE;
- Complete a detailed assessment of each workstation to ensure potential risks are identified, taking into account the equipment, furniture, the work environment and the work being done, as well as any special needs of our individual employees;
- Ensure that all our workstations meet the requirements of DSE guidance;
- Give all our DSE users the opportunity to plan their work so that there are breaks or periodic changes of activity;
- Ensure that DSE users are aware of the arrangements for eye and eyesight tests and arrangements for the provision of corrective appliances if special ones are required for DSE use;
- Provide health and safety training and information for all users of DSE equipment;
- Periodically assess accident records to identify any trends in DSE-related ill health and ensure that injuries are appropriately reported; and
- Ensure that DSE users bring to our attention any changes in their own medical conditions.

### Key Documentation to comply with this Policy

Display Screen Equipment internal audit pro-forma

DSE Assessment (HSE)

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## Driving Company Vehicles

Driving and road use is a significant element in many business activities and form part of many employees' job roles. Road traffic legislation imposes specific requirements on employers in respect of vehicle maintenance and use. And under health and safety legislation, London Railway Limited Trading As Wastesure also has a responsibility to ensure the health and safety of their employees whilst driving.

To ensure the safety of drivers of company vehicles and others that could be affected by the use of vehicles, we will operate the following procedures:

- The Company Director is responsible for ensuring that all company vehicles are suitable for their intended purpose.
- All company vehicles will be serviced according to manufacturers' recommendations, and service logbooks will be maintained.
- The Company Director will ensure that, where required, vehicles hold a current MOT test certificate and are presented for testing as legally required.
- The driver is responsible for ensuring that a weekly vehicle check sheet is completed for each vehicle under their control.
- The Company Director is responsible for ensuring that company vehicles are driven only by persons holding a current, full licence for the type of vehicle and who has been authorised to do so.
- Before being allowed to drive a company vehicle, an employee will be required to present his/her driving licence for inspection. Thereafter, driving licences will be inspected annually.
- We do not expect employees to take risks when driving. Journeys should be planned in advance, allowing sufficient time to drive within speed limits and according to traffic conditions.
- Some prescription drugs and medicines carry a warning to persons taking them that they should not operate machinery or drive vehicles. Any driver prescribed such medication must inform the company immediately and must not drive until they have stopped taking the medication.
- Drivers are instructed to obey the Highway Code at all times.
- Drivers are instructed NOT to use a mobile phone while driving unless it is hands-free.
- The employee is responsible for paying any fines for driving or parking offences committed while he/she is in charge of a company vehicle.
- Any driver of a company vehicle must inform the company about any prosecution for a driving offence.
- Drivers are advised that on the morning following a night of excessive consumption of alcohol, their blood alcohol level may be above the legal limit. If a driver thinks that this is the case, he/she must not drive until they consider that their blood alcohol level is within the limit.

Driving a company vehicle without authorisation or one of the Directors or whilst under the influence of alcohol or illegal drugs are serious breaches of our health and safety rules. They will be considered as gross misconduct, which could lead to summary dismissal.

### Key Documentation to comply with this Policy

Driving Company Vehicles internal audit pro-forma

Pre-Journey vehicle Checklist

Company Name	Signed by	Review due date
London Railway Limited Trading As Wastesure	Mark Dunne	04.01.2022

## Electrical Safety

Electricity has the potential to kill. This danger is increased because it cannot be seen. Electrocution can also cause burns and shorting of conductors can cause fire or explosion.

We accept that we have duties under the current edition of the Electricity at Work Regulations to take precautions against the risk of death or personal injury from electricity in work activities. The following procedures, aimed at eliminating risk or reducing it to an acceptable level, will be adopted:

- All electrical equipment must be suitable for the purpose, i.e. the use to which it may be put and the environment it may be used in.
- All electrical equipment shall have a satisfactory means to ensure the equipment can be isolated.
- All electrical work must be done by trained and competent persons.
- Every electrical system must be inspected and tested at regular intervals.
- All electrical equipment must be regularly examined to make sure it is safe by the equipment user.
- The exposed metalwork of all electrical equipment likely to become electrically charged must be earthed unless the equipment is: Supplied via an isolating transformer; or, Double insulated; or, only supplied power at an extra-low voltage or safety extra-low voltage.

### Fixed Electrical Installations within company premises

Any modifications or extensions to the fixed electrical installations in our premises will be designed by a professionally qualified electrical engineer. To assist with this, persons purchasing equipment are responsible for obtaining from the manufacturer/supplier details of power requirements and for bringing these to the attention of the person designing the electrical system. All designs will comply with the current edition of the Institution of Engineering and Technology Regulations for Electrical Installation (IET Regulations).

Any maintenance work will be carried out by a competent person to the standard recommended by the current edition of the IET Regulations. Persons carrying out electrical maintenance work will be required to provide risk assessments for the tasks they will be carrying out.

Electrical switchgear and control equipment will be kept clean and free from obstruction at all times.

The fixed electrical installation will be inspected and tested at intervals of five years by a contractor approved by the National Inspection Council for Electrical Installation Contracting (NICEIC) or the Electrical Contractors Association (ECA).

### Use of Extension Leads

Extension leads and multi-point adaptors are discouraged since their use introduces a safety hazard. Such expansion devices should never be used in conjunction with each other, i.e. only one expansion device may be used between the socket outlet and the equipment.

### Pre-Use Checks on electrical equipment

Users must check their electrical equipment for obvious defects before each use, including general computer equipment and portable electric tools.

Prior to use, the User should check:

- Cables to ensure there are no defects in the insulation.
- Any extension leads, and multi-point adaptors are in good condition.
- The plug to ensure there are no loose parts and the join between plug and flex is in good condition.





### Portable Appliances

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Portable appliance testing of London Railway Limited Trading As Wastesure Electrical equipment shall be undertaken in accordance with the HSG guidance document HSG107.

- Where formal testing has been determined as a requirement, equipment should not be used if it does not display a current testing label. This is usually, but not always, displayed on the plug.
- User checks must be carried out before use.
- Equipment manufacturers maintenance and usage instructions must be followed.
- Battery-powered or 110 voltage tools with power supplied through an isolating centre tapped to earth should be used if practicable.
- An RCD or ELCB must be used with existing 240-volt equipment where there is no safer alternative. Such devices must be tested by operating the in-built test button every 3 months and inspected by a portable electrical tester every year as a minimum.
- The supply voltage to portable electric tools must be within the operating range marked on the tool.

Where London Railway Limited Trading As Wastesure are required to use portable appliances on-site, the following plugs and sockets in accordance with BS EN 60309

Rated Operating Voltage or frequency	Colour Code	
20 - 25 volts	Violet	
40 - 50 volts	White	
100 – 130 volts	Yellow	
200 – 250 volts	Blue	
380 – 480 volts	Red	

## Key Documentation to comply with this Policy

Electrical Safety internal audit pro-forma

Company Name	Signed by	Review due date
London Railway Limited Trading As Wastesure	Mark Dunne	04.01.2022

## Fatigue Management

The Working Time Regulations 1998 (as amended) (WTR) lay down the minimum legal requirements on how to organise working time. Some workers in certain sectors, such as the aviation industry and mobile workers in road and sea transport, are currently exempt from WTR and are subject to specific legislation that relates to working time.

London Railway Limited Trading As Wastesure shall attempt to plan work during standard daytime hours where practicable. In accordance with HSG256, standard daytime hours are considered as “A work schedule involving an activity during the day, commonly for a period of eight hours between 7.00 am and 7.00 pm. There are usually two periods of work, one in the morning, the other in the afternoon, separated by a lunch-time break”.

Fatigue is the decline in mental and/or physical performance that results from prolonged exertion, lack of quality sleep or disruption of the internal body clock. The degree to which a worker is prone to fatigue is also related to workload. For example, work that requires constant attention is machine paced, complex or monotonous will increase the risk of fatigue

To ensure that all workers and sub-contractors are able to maintain an acceptable level of concentration London Railway Limited Trading As Wastesure shall comply with the Working time directive. In general, the Working Time Regulations provide rights to:

- A limit of an average 48 hours a week on the hours a worker can be required to work, though individuals may choose to work longer by "opting out".
- Paid annual leave of 5.6 weeks' a year (Only applicable to PAYE Employees).
- 11 consecutive hours' rest in any 24-hour period.
- A 20-minute rest break if the working day is longer than six hours.
- One day off each week.
- A limit on the normal working hours of night workers to an average eight hours in any 24-hour period, and an entitlement for night workers to receive regular health assessments.

There are special regulations for young workers, which restrict their working hours to 8 hours per day and 40 hours per week. The rest break is 30 minutes if their work lasts more than 4.5 hours. They are also entitled to two days off each week.

London Railway Limited Trading As Wastesure shall:

- Ensure that adequate opportunity is available for employees, contractors and visitors to rest sufficiently before commencing work.
- Monitor and control working hours, including overtime, to provide time arrangements that do not require excessive periods of time at work.
- Identify, develop and implement a fatigue management plan with control strategies to address fatigue-related risks within the workplace in consultation with the employees.
- Provide training to employees and contractors to develop a common understanding of fatigue management.
- Develop a culture of shared responsibility for fatigue management within the Company.
- Implement an appropriate employee assistance program to assist in managing fatigue.
- Promote a healthy lifestyle, both at work and at home.

### Key Documentation to comply with this Policy

Fatigue Management internal audit pro-forma

Company Name	Signed by	Review due date
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## Fire Safety

Fire safety refers to precautions that are taken to:

- Prevent or reduce the likelihood of a fire starting that could result in death, injury or property damage
- Alert inhabitants of a building if a fire starts
- Enable those that are threatened by fire to survive
- Reduce the damage caused by a fire.

Fire safety measures include those that are in place and commissioned within a building or premises. The term includes the actions that occupants of the building have been trained to take in the event of, or to prevent, a fire.

Threats to fire safety are referred to as fire hazards. Fire hazards may include situations that increase the likelihood of a fire starting or those that may impede escape once a fire has started.

To ensure that all our activities are undertaken safely and that the risks from a fire are clearly understood throughout the company, we will:

- Carry out and record fire risk assessments for our operations, in accordance with the Government's Fire Risk Assessment Guides.
- Adopt a smoke-free policy.
- Prepare an emergency fire action plan taking into consideration employees and disabled people.
- Provide appropriate fire safety information and training for employees and others who may be affected.
- Carry out periodic fire drills.
- Maintain the fire safety measures identified by our fire risk assessments; and
- Record information and maintain records.

## Site Fire and Emergency Procedures

Prior to the commencement of and project, potential emergency situations must be considered. These may include fires or bomb threats, but dependent on the project, may involve work within confined spaces, or how to rescue persons at height etc. The emergency response arrangements will differ from project to project, but in each case, emergency contingency plans should be considered at the planning stage.

Fire evacuation procedures will vary from site to site; these will be communicated within the site induction. When working in some premises, a copy of the existing fire procedures will be provided. The fire procedures in place for the site will be included within the Site Induction and displayed. In all cases, employees must follow the instructions given.

Where such arrangements are in place, employees must sign in and out whenever they enter or leave a site. All employees must familiarise themselves with the site fire procedures and escape routes before commencing work.

## As a Contractor or Sub-Contractor

Fire evacuation procedures will vary from site to site.

Where the Client provides a Site Induction, All London Railway Limited Trading As Wastesure must attend. Where Clients provide copies of fire procedures. All London Railway Limited Trading As Wastesure Employees or Sub-Contractors are expected to read and understand the content in addition to following all verbal instructions given.

Where such arrangements are in place, employees and sub-contractors must sign in and out whenever they enter or leave a site.

If employees or sub-contractors are not informed about the fire procedures on a site, they must attempt to familiarise yourself with the site fire procedures and escape routes before commencing work. In the event of uncertainty, work must be suspended until each employee or sub-contractor is aware of the local site fire procedures and escape routes.

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## Fire and Emergency Action

Each site or workplace shall be assessed for the potential for fire or emergencies. Where assessments identify high risks, an action plan will be established at that site to deal with such situations.

Provision shall be made at each workplace for access on to sites of emergency and rescue service vehicles.

In the event of an emergency, the most senior person on site shall summon by telephone all necessary emergency and rescue services.

Provision shall be made for the emergency services to be met at the site entrance and directed to the site of the emergency.

All persons not required to assist in any rescue operation shall be removed from the area of the emergency.

Planned escape routes shall be identified at every temporary site accommodation, permanent building and any structure under construction. Appropriate signage in accordance with the Health and Safety (Signs and Signals) Regulations shall be provided to ensure all persons are directed to a place of safety.

Instructions in case of fire or emergency shall be included in all induction training.

## Key Documentation to comply with this Policy

Fire Safety internal audit pro-forma

Fire Risk Assessment

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## First Aid

It is important that employees who suffer an accident or ill health at work receive immediate attention and that there are procedures in place for the emergency services to be notified in serious cases. Fast action can save lives.

London Railway Limited Trading As Wastesure Shall:

- Assess the risk to complete a first aid assessment and provide the appropriate level of first aid provisions.
- Ensure there is a suitably stocked first aid box. This is to be checked by the First Aider on a regular basis.
- Ensure there is an appointed First Aider to take charge of arrangements. Their name and location of the first aid box is to be clearly displayed on the notice board and detailed within Site Induction.
- Ensure details of the work premises, address and telephone numbers are clearly identified to advise the emergency services (if contacted).
- Have details available of local emergency services (telephone numbers, addresses).
- Ensure that all injuries sustained on-site (no matter how minor) are accurately recorded within the accident book.

## First Aid Assessment

When completing a first aid assessment, it is important to assess the risk to determine the level of first aid cover required. Offices are generally perceived as low risk and construction sites high risk.

Adequate cover and provision should be considered for the specific workplace and activities being undertaken. There may be a requirement for additional cover due to a peak in the workforce, or shift work.

When undertaking a first aid assessment, the following should be considered:

- Are there specific risks such as hazardous substances, machinery or loads?
- Are there parts of the works with higher risks needing particular attention? - consider previous records of accidents
- How many people are employed in the workplace? - this may fluctuate
- Are there in-experienced persons, or those with a disability or specific health problems? - these must be ascertained at induction
- Are the works spread over a large area, where first aid provision may be time-dependent?
- Is shift work involved?
- Is the workplace remote from emergency services?
- Are there: work experience, visitors, maintenance personnel or the public at the workplace to consider?

## Blood Borne Viruses

There are many blood-borne viruses (BBV), all of which should be considered as risks to human health. However, they are a risk only if a virus enters the bloodstream of the recipient. BBV is transmitted from one person to another via unprotected sexual intercourse; blood-to-blood contact (e.g. injecting drug use); mother-to-baby transmission.

BBV are not spread through the air or by touch, nor is there any danger from handling objects that have been used by an infected person, or from sharing an office or washroom.

## Aids (Acquired Immune Deficiency Syndrome)

AIDS can occur in individuals following infection by a virus known as Human Immunodeficiency Virus (HIV).

As a result of this infection, the body's normal defences against illness may break down. Where this occurs, an individual is open to infections which otherwise would not have occurred.

Not all individuals who become infected with the virus will necessarily develop AIDS.

## Hepatitis

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Hepatitis B virus (HBV) and Hepatitis C (HBC) virus are BBV that can cause liver disease.

Symptoms range from flu-like in mild cases through to severe liver damage.

BBV can be transmitted where there is direct contact with blood or other bodily fluids (e.g. saliva, urine, stools, vomit, all of which have been visibly contaminated with blood) of infected individuals, particularly where the blood or bodily fluids can enter through an open wound.

The use by first aiders of the simple precautions listed below eliminates the risk of transmission:

- Cover all cuts, sores, chapped skin or other open wounds with a waterproof dressing.
- When giving first aid, wear disposable sterile surgical gloves.
- Wear disposable gloves when cleaning up spillages of blood or other bodily fluids with paper towels.
- Do not use teeth when putting on/removing gloves.
- Pull off gloves so that they are inside out.
- Where practicable gloves and towels must be disposed of in a clinical waste bag and sent for incineration by a registered waste carrier.
- Hands must be washed with soap before and after applying dressings. Hands and other parts of the body must be washed immediately with soap and water after contact with blood, other bodily fluids and after removing gloves.

When spillages of blood or other bodily fluids (with the exception of urine) occur, these must be cleaned up immediately using paper towels using a solution of one-part bleach to ten parts water. NB. DO NOT use bleach on urine spillages. Use soap and water.

If lips, eyes, mouth, tongue or broken skin are in contact with blood or other bodily fluids, they must be washed with clean cold water, and medical advice sought.

## Office First Aid

The First Aid at Work Regulations aim to provide suitable arrangements to enable injured employees to obtain first aid. London Railway Limited Trading As Wastesure recognise that prompt action can save lives or prevent the condition of an injured person from deteriorating. While office work is generally lower risk, adequate first aid cover is still required as accidents can happen at any time in any place.

The Office manager is responsible for assessing first aid requirements within the office environment. The Company Director is responsible for ensuring that sufficient trained First Aiders and/or Appointed Persons are employed.

Signs stating the names of the First Aiders/Appointed Persons and the locations of the first aid boxes will be displayed.

The First Aiders/Appointed Persons are responsible for ensuring that the contents of first aid boxes are checked regularly and topped up as required.

The following First Aid information will be available on notice boards throughout the office:

- Details of all First Aiders.
- Details of all appointed Persons.
- First Aid box locations.

All injuries, however minor, should be recorded in the Accident Book and reported through an incident report form.

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## Number of First Aiders required on work premises

From your risk assessment, what degree of hazard is associated with your work activities?	How many employees do you have?	What first aid personnel do you need?
<b>Low hazard</b>  For example, offices, shops, libraries	Fewer than 25	At least one appointed person
	25-50	At least one appointed person
	More than 50	At least one first aider trained in first aid at work (FAW) for every 100 employed (or part thereof)
<b>Higher hazard</b>  For example, light engineering and assembly work, food processing, warehousing, extensive work with dangerous machinery or sharp instruments, construction, chemical manufacture	Fewer than 5	At least one appointed person
	5-50	At least one first aider trained in EFAW or FAW depending on the type of injuries that
	More than 50	At least one first aider trained in FAW for every 50 employed (or part thereof)

## Key Documentation to comply with this Policy

First Aid internal audit pro-forma

First-aid needs assessment

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## Hazard Reporting

London Railway Limited Trading As Wastesure operate a hazard reporting system the purposes of which are to:

- Promote our employees' interest and involvement in health and safety matters.
- Encourage employees to identify hazards and unsafe conditions in their work areas so that action can be taken to prevent incidents.
- Maintain written records of actions taken to eliminate hazards and unsafe conditions.
- Assist with the monitoring of the effectiveness of our procedures for managing health and safety.

Any employee who observes a hazard or unsafe condition that they are not able to take action to remove should record the details on a Hazard and dangerous environment report form. Forms should be handed to the Site Manager or Works Supervisor.

Where a Site Manager or Works Supervisor is able to take action to remove a hazard or unsafe condition, he/she will do so and will complete the Form, which will then be forwarded to the Company Director. Where a Site Manager / Supervisor is not able to take suitable action, the Form will be sent to the Company Director to provide detailed instruction on the actions to take to remove or control the hazard as required.

When suitable actions have been taken and the hazard or unsafe condition removed, the completed investigation form will be discussed with the originator, with a copy being kept by the Company Director.

### Stop the job Authority

London Railway Limited Trading As Wastesure encourage all Employees to report any potentially unsafe work environment including dangerous equipment, behaviours, machines, devices or any activity that they feel puts the health, safety and welfare of others at risk.

Should any Employee feel that the work that they are undertaking or are about to start may be unsafe, the following process should be followed:

The employee must immediately report any potentially hazardous working environment or activity to a company Director.

Work will be stopped by all persons within the vicinity, and the Director must immediately investigate the report in the presence of the worker. The Director may delegate this to a Manager or Health and Safety Consultant should they not be available.

During the investigation, the Investigator must record as many details as possible regarding the refusal by completing the notice of Hazard and dangerous environment report form. If required, the contracted health and safety consultant should be contacted by the Investigator for further clarification. The collated information shall then be relayed back to the Company Director pending a decision on the actions to take to remedy the situation.

Where required, the employee may be assigned alternative duties/work. Should such action be unavailable, the Employee may be required to return home.

While the investigation is ongoing, the work/task shall not be recommenced by any person before a decision being made by the company Director concerning whether the level of risk is acceptable to the business. Any Workers required to undertake the work in the absence of the Employee who raised the original issue shall be provided with all of the information concerning the refusal to work, including a copy of the original hazard and dangerous environment report. Please note, work within this location will generally only be permitted to enable remedies to be complete.

If the Director does not consider the refusal to be based on reasonable grounds, this shall be explained to the Employee who raised the initial concern. A decision on whether this Employee shall return to this activity will be made in consultation with the Employee. If the employee is still not satisfied, the activity will be assigned to another worker.

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Following completion of the investigation, the findings will be discussed with the originator.

## Whistleblowing

London Railway Limited Trading As Wastesure is committed to conducting our business with honesty and integrity, and we expect all staff to maintain high standards following our policies and procedures. However, we recognise that there is a risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential to prevent such situations occurring or to address them when they do occur.

The aims of this policy are to:

- Encourage staff to report suspected wrongdoing as soon as possible in the knowledge that their concerns will be taken seriously and investigated as appropriate and that their confidentiality will be respected.
- Provide staff with guidance as to how to raise those concerns. And,
- Reassure staff that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

This policy applies to everyone who carries out work for the firm in the UK, including:

- Partners
- Employees
- Contractors and sub-contractors
- Agency staff
- Consultants
- Work experience or other trainees

What is whistleblowing?

Whistleblowing is the disclosure of information which relates to suspected wrongdoing (generally a breach of a legal, statutory or regulatory requirement or unethical, immoral behaviour). This may include:

- Violation of a legal requirement - e.g. health and safety obligations owed by the firm or an individual
- General malpractice - such as immoral, illegal or unethical conduct
- Gross misconduct
- Potential breach of the requirements in, or made under, The Pensions Act 2004, Proceeds of Crime Act 2002 or Bribery Act 2010

If you have any genuine concerns related to any of the above, you should report it under this policy.

## Protected disclosures

An individual making a “protected disclosure” is given statutory protection from victimisation under the Public Interest Disclosure Act 1998 (PIDA), provided the disclosure is in the public interest.

A “protected disclosure” is any disclosure of information which - in the reasonable belief of the individual making the disclosure - tends to show that one or more of the following has been committed, is being committed or is likely to be committed. The disclosure must be made following certain conditions - these conditions are less demanding if the disclosure is made internally:

- A criminal offence
- A failure to comply with any legal obligation
- A miscarriage of justice
- The putting of someone’s health or safety in danger
- Damage to the environment

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- Deliberate concealment of information relating to any of the above

It is immaterial whether the information is confidential and whether the incident occurred, occurs or would occur in the UK or elsewhere and whether the law applying to it is that of the UK or any other country or territory. A legal obligation can include a contractual or other civil obligation as well as an obligation under criminal law.

Specific instances of wrongdoing as described above under “What is whistleblowing”, for example breaches of codes of conduct of professional institutions, do not constitute a protected disclosure. You should seek advice if unsure on this point. (See ‘Where can I get independent advice?’ below).

## Raising a whistleblowing concern

All whistleblowing disclosures will be treated as confidential and will be reported accordingly.

Please contact the company Director Mark Dunne directly in person or by email for any issue to be reported.

You should make it clear that you are making your disclosure within the terms of our whistleblowing policy. This will ensure that we take the necessary action to investigate the disclosure and to protect the whistle-blower’s identity.

We will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us from giving you specific details of the investigation or any disciplinary action taken as a result.

You should treat any information about the investigation as confidential. While we cannot always guarantee the outcome you are seeking; we will try to deal with your concern fairly and in an appropriate way. By using this policy, you can help us to achieve this.

## Confidentiality

We hope that staff will feel able to voice concerns openly under this policy. However, if you want to raise your concern confidentially, we will make every effort to keep your identity secret. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you.

We do not encourage staff to raise concerns anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more challenging to establish whether any allegations are credible. If you are concerned about possible reprisals if your identity is revealed, you should come forward to the Company Director and appropriate measures can be taken to preserve confidentiality. Anonymous concerns will nevertheless be taken seriously and investigated as thoroughly as possible. London Railway Limited Trading As Wastesure is not accountable for maintaining anonymity where you have told others of the alleged issue.

## Protection and support for Whistle-blowers

Understandably, Whistle-blowers are sometimes worried about possible repercussions. London Railway Limited Trading As Wastesure aim to encourage openness and will support staff members that raise genuine concerns under this policy, even if they turn out to be mistaken.

## External disclosures

This policy aims to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally. In some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator, e.g. the Health and Safety Executive. It will rarely if ever be necessary to alert the media. We strongly encourage you to seek advice before reporting a concern to anyone external (excluding the Unions or any independent whistleblowing charity).

The independent whistleblowing charity, Public Concern at Work, operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern. Their contact details are at the end of this policy.

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## Independent advice

Individuals can contact the independent charity Public Concern at Work for free, independent and confidential advice, for example, to find out what is protected by PIDA and how best to raise concerns. The charity runs a UK helpline on 020 7404 6609 and a Scottish helpline on 0141 550 7572.

## Key Documentation to comply with this Policy

Hazard and Dangerous Environment report form

Hazard and Dangerous Environment investigation report

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## Health Surveillance

This procedure underpins the measures that managers and employees of London Railway Limited Trading As Wastesure need to take in the prevention of work-related ill health by implementing the appropriate control measures necessary to protect staff and effective health surveillance required where there is any residual risk to the employee's health and wellbeing.

Health surveillance is about putting in place systematic, regular and appropriate procedures to detect early signs of work-related ill health among workers who are exposed to certain health risks and acting on the results. Health surveillance information is particularly important where there is an identifiable disease or adverse health condition associated with the work, where there are valid techniques to detect indications of the disease or condition and a reasonable likelihood that this disease or condition might develop under the conditions at work.

This procedure applies to all employees.

London Railway Limited Trading As Wastesure 's responsibility to provide health surveillance is specifically limited to employees; however, it is acknowledged that this causes some difficulties where Apprentices / trainees etc. may work jointly on projects and be exposed to the same risks; therefore the same provision should be extended to non-employees.

Health surveillance is a term used for any activity which involves routinely seeking information about any employee's state of health in relation to their work. The purpose of health surveillance is to:

- Detect adverse health conditions at an early stage.
- Check the effectiveness of the control measures in place.
- Provide feedback on the accuracy of the risk assessments.
- Identifying and protecting individuals at risk.

The means of determining when health surveillance is necessary is via risk assessment. The risk assessment process should identify if health surveillance is necessary, and this must be identified and recorded as a health risk control system.

Occupational health is a distinct branch of medicine concerned with how a worker's health can affect his or her ability to do the job and how the work environment can affect an employee's health and wellbeing.

### Initial Employment

Where required, a pre-employment screening questionnaire may be issued to an Employee following an assessment of previous work undertaken by the Employee. The requirement to provide pre-employment screening will be at the discretion of London Railway Limited Trading As Wastesure and based on verbal discussions with the new Employee.

While the contents of pre-employment questionnaires are regarded as relevant aspects may need to be discussed with the nominated 3rd party specialist to ensure the safety of the individual concerned and to make necessary adaptations to the tasks/workplace.

Confidential information includes:

- Any occupational health questionnaire completed by the individual but excluding any information that the individual agreed at the time could be made available to specified members of London Railway Limited Trading As Wastesure, e.g. health surveillance and manual handling assessment forms submitted following discussion with Supervisors.
- Any other clinical information.
- Details of clinical examination.

Non-confidential information includes:

- Basic information relating to employment

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- Any history of reported exposure to specific hazards
- Relevant information relating to types and dates of immunisation, diagnostic tests, accident at work and environmental monitoring data
- Health surveillance survey information provided following discussion with Supervisors or management.

## Annual Health Surveillance Checks

Annual health surveillance checks shall be undertaken for the following:

- Display Screen Equipment Eye Screening Programmes
- General health surveillance questionnaires covering the following topics:
  - Skin condition
  - Respiratory performance
- Immunisation Programmes for the following staff as required
  - Cleaners and caretakers
  - Those staff who are required to travel abroad as part of their duties
  - First Aiders for hepatitis B injections.

The risk assessment programme is available to identify what the health risks are and to establish the relevant aspects of health management, including:

- Monitoring (sampling) to characterise levels of exposure to health hazards
- Specifications of safe and healthy working practices and environments,
- Identification of opportunities for improvement addressing diversity – young persons, pregnant women, female night workers, disabilities, etc.
- Specific risk assessment - addressing the specific requirements to manage health risks, for example, in workers who are not working on-site, e.g. those that are attending foreign field trips.

The health surveillance for stress management is managed by the Company Director with a holistic approach in supporting staff and offering them staff development in the areas of mentoring, coaching, mediation, etc. to actively promote positive wellbeing for all staff.

The Occupational Health Adviser writes to the employee and Personnel, indicating whether the employee is fit for work with or without adjustments or additional follow up.

If the employee is fit for work with no adjustments or additional follow up, no further action is required. The Occupational Health Adviser sets the employee up into the health surveillance check process and will contact the employee when the next surveillance programme is scheduled.

If the employee is unfit to undertake the duties of their current role, the individual will be assessed by an Occupational health specialist where restrictions on duties will be advised depending on the severity of the conditions. The findings shall be shared with the employees via the Company Director

## Record Keeping

A health record must be kept for all employees under health surveillance.

Records are important because they allow links to be made between exposure and any health effects. Health records, or a copy, should be kept in a suitable form for at least 40 years from the date of last entry because often there is a long period between exposure and onset of ill health.

Employee details should include:

- Surname

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- Forename(s)
- Gender
- Date of birth
- Permanent address, including postcode
- National Insurance number
- Date present employment started

Recorded details of each health surveillance check should include the:

- The date they were carried out and by whom
- The outcome of the test/check
- Decision made by the occupational health professional in terms of fitness for the task and any restrictions required. This should be factual and only relate to the employee's functional ability and fitness for specific work, with any advised restrictions.

The record should be kept in a format that it can be linked with other information (e.g., with any workplace exposure measurements).

## Key Documentation to comply with this Policy

Health Surveillance internal audit pro-forma

Skin Condition annual assessment

Respiratory annual health assessment

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## Host Employment

Working for host employers exposes you to a variety of risks and hazards that are beyond the direct control of our organisation.

To safeguard the safety of our employees whilst working on external sites, it is London Railway Limited Trading As Wastesure policy to:

1. Obtain full work brief assignment instructions prior to finalising contractual agreements;
2. Request & obtain Health and Safety information, policies, risk assessments, safe working guidance and practices from the host employer that is relevant to the activities at their premises and work to be undertaken by our Operatives;
3. Meet with the Host employer prior to our starting work to:
  - Establish rules and guidelines for our operations at their premises;
  - Obtain information on activities that may present a hazard to you and identify activities and actions that must be avoided;
  - Obtain information on emergency actions including fire, first aid and accident reporting arrangements;
  - Define the areas in which the work is to be carried out and any segregation arrangements;
  - Define areas that are not accessible during our course of work;
  - Agree on routes to and from the worksites and access to welfare facilities;
  - Obtain and review copies of all risk assessments relevant to the work being undertaken and areas of occupation;
  - Obtain and review copies of all safe working practices / method statements and safe working guidance to be adhered to;
  - Ensure site induction training, job training, instructions and notices and information to safeguard your health and safety is provided;
  - Obtain details of any special occupational qualifications or skills necessary to be held by you to carry out work safely and provide appropriate employees based upon this criterion;
  - Obtain details of the specific features of the jobs to be filled by those employees (in so far as those features are likely to affect their health and safety) and to provide appropriate employees based upon this criterion;
  - Obtain any other information, instruction, training, equipment or facility that could reasonably be expected to safeguard the health and safety of the temporary worker;
  - Stop working immediately if work appears unsafe, and establish that staff should report any concerns to a manager immediately;
  - Ensure, so far as is reasonably practicable, that you are provided with comprehensible and relevant information on the hazards and risks and preventative and protective measures.

### Key Documentation to comply with this Policy

Host Employment internal audit pro-forma

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## Legionella

Legionnaires' disease is an uncommon form of pneumonia caused by the legionella bacterium. The majority of cases reported are as single (isolated) cases, but outbreaks can occur. All ages may be affected, but the disease mainly affects people over 50 years of age, and generally men more than women. Smokers and the immunocompromised are at a higher risk.

London Railway Limited Trading As Wastesure act as Duty Holder for all Company premises and bear overall responsibility for compliance with the control of legionella bacteria in premises where water is used, stored; or if creating and transmitting water droplets (Aerosols) which may be inhaled, causing a reasonably foreseeable risk of exposure to Legionella bacteria.

### Legionella Risk Assessment

London Railway Limited Trading As Wastesure Shall ensure that a legionella risk assessment is undertaken on company premises where any of the following systems are installed:

- Cooling systems with cooling towers, evaporative condensers or dry/wet cooling systems.
- Hot and cold-water systems.
- Spa Pools.
- Plant and systems containing water that can create and increase the risk from legionella during operation or when being maintained.

Within Premises where London Railway Limited Trading As Wastesure are not acting as Duty Holder, the person/company in charge of the building and subsequent maintenance retains responsibility for the completion of a legionella risk assessment.

All Companies contracted to undertake any Legionella risk assessment shall be deemed competent in accordance with the London Railway Limited Trading As Wastesure Sub-Contractor control policy prior to contracting work to the Competent Organisation.

Where the risk assessment shows that there is a reasonably foreseeable risk of exposure to legionella bacteria. The Company Director retains the responsibility for the implementation of control measures following the completion of the risk assessment (where applicable).

Findings from the risk assessment shall be communicated with Safety Representatives, Employees, Sub-Contractors and other building occupiers (Where applicable).

### Conditions that promote the growth of Legionella Bacteria

Legionella bacteria may contaminate water systems where the temperature is between 20 and 45°C. It is uncommon to find any significant growth below 20°C, and the bacteria do not survive for any lengthy period above 60°C. The optimum temperature growth is 37°C.

The presence of sediment, sludge, scale and organic material can act as a source of nutrients for Legionella bacteria. Commonly encountered organisms in water systems such as algae, amoebae and other bacteria may serve as a nutrient source for Legionella. The formation of a biofilm (slime) within a water system will also play an important role in harbouring and providing favourable conditions in which Legionella can proliferate.

The presence of water stagnation can also play a significant part in legionella growth. An example of this would be a building that has little to no use of its water systems within a school holiday or disused pipework that is still live.

If the conditions mentioned above are eliminated or controlled, the likelihood of legionella growth will be significantly reduced.

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## Design and Installation of new or refurbished building services

All domestic water systems new or refurbished installations shall comply with current water regulations and ACOP L8 / HSG 274 guidance. It is important to ensure that potential hazards are designed out where possible before installation.

## Management of legionella

Where the legionella risk assessment identifies that there is a reasonably foreseeable risk, and it is reasonably practicable to prevent exposure or control the risk from exposure, London Railway Limited Trading As Wastesure shall appoint a competent person or persons to help undertake the measures needed to comply with the requirement within the Control of Substances Hazardous to Health Regulations (COSHH). This may be an internal employee or an external organisation, depending on the level of risk identified during the risk assessment.

Where the assessment shows that there is a reasonably foreseeable risk of exposure to legionella bacteria, the use of water systems, parts of water systems or systems of work that lead to exposure must be avoided so far as is reasonably practicable. Where this is not reasonably practicable, a written scheme for controlling the risk from the exposure that shall be developed by a competent person and shall be properly implemented and managed.

Where the risks are insignificant and are being properly managed, no further action may be required.

The written scheme shall specify measures to take to ensure that it remains effective.

The written scheme should include, as a minimum:

- An up-to-date plan showing the layout of the plant or water system, including parts temporarily out of use (a schematic diagram is sufficient).
- A description of the correct and safe operation of the system.
- The precautions to take.
- Checks to carry out to ensure the written scheme is effective and the frequency of such checks.
- The remedial action to take if the written scheme is shown to be not effective.

Where required, water quality testing shall be undertaken by a suitably qualified and competent service provider. All water quality testing shall be undertaken in accordance with HSG247 for both cooling systems and hot and cold water systems.

## Review of Control Measures

Where additional precautions are deemed necessary, they shall be reviewed to ensure that they remain effective. Where required, this shall be contracted to a suitably qualified and competent organisation.

## Record Keeping

In accordance with Legal reference document L8, records shall be maintained including details on:

- The Appointed person(s) for conducting the risk assessment, managing and implementing the written scheme.
- Any significant findings from the risk assessment.
- The written scheme and evidence of its implementation.
- The state of operation of the water system such as “in use” or “not in use” etc.
- The results of any monitoring inspection, test or check carried out and the dates.

All records shall be kept for a period of 2 years afterwards. Any monitoring inspection, test or check carried out, and the dates shall be kept for a period of 5 years (Minimum).

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Legionella Management internal audit pro-forma

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## Lone Working

London Railway Limited Trading As Wastesure commit to ensuring that best practice methodologies and areas for consideration relating to any person(s) that are required to work along with planning such works to ensure that the activity is completed safely.

Lone and out-of-hours working poses a potential risk to those carrying out the activity, especially when issues such as emergencies, loss of communications and unexpected changes in circumstance take place.

When planned correctly, lone and out-of-hours working can be undertaken in a safe manner and is often the only practical way to complete certain types of work.

For most circumstances, there are no specific legal duties on employers in relation to lone working. However, London Railway Limited Trading As Wastesure have a general duty under Section 2 of the Health and Safety at Work Act to provide and maintain safe working arrangements and ensure the safety of employees. Regulation 3 of the Management of Health and Safety at Work Regulations specifies the need to carry out a risk assessment of tasks to which their employees are exposed.

Lone working can be defined as:

Any work activity that is to be carried out in isolation from other workers by an individual or a small team. Typical operations carried out on sites which may necessitate lone working include: Site security/night watchmen, remote working, i.e. Working outside of normal hours.

Additional control measures should be in place when managing individuals who may be working outside of audible range / line of sight of the rest of their working colleagues.

Out-of-hours working is defined as:

That generally considered being outside the normal working hours of a workplace where supervision and/or site activities are at a minimum or even non-existent. Such situations may include monitoring, surveying, testing and client-specific activities outside the contractual agreement between London Railway Limited Trading As Wastesure and the Client themselves. In such situations, it is imperative that an agreement has been reached in the planning stages as to how supervision and activities will be maintained.

## Restrictions on Lone Working

The Company Director shall determine the restrictions on lone or out-of-hours working.

In some circumstances, the rules applicable to work in a particular location may not permit lone working. Wherever possible, the practice of lone working should be eliminated altogether.

For example, in certain circumstances, this may apply to elements of work associated with:

- Working over or near water
- Activities involving chemicals
- Work at height
- Situations where the adequate provision of rest, hygiene and welfare facilities cannot be assured
- The risk of violence from members of the public.

In such cases, alternative methods of carrying out the work should be investigated, for example:

- Re-timing the work so that it can be undertaken when others will be present,
- Arranging for a second person to accompany the worker.

In all situations where such works are undertaken, the competence and fitness of the individual engaged in the activity must be confirmed.

The Contracted H&S Consultant will provide support as required.

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The key to maximising personal safety and wellbeing wherever lone work is considered is through a suitable and sufficient risk assessment that addresses:

- Whether the work can be done safely by a single person.
- The arrangements that are required to ensure that the lone worker is at no more risk than employees working together.

## Ensuring competency and fitness

It is essential that the worker identified to undertake the activity is competent and fit to do so. It is important that both the Works Supervisor and the Worker concerned appreciate the nature of the activity and the work involved.

The Works Supervisor must ensure the Risk Assessment for which the lone or out-of-hours work activity is to be undertaken is completed and reviewed to ensure that it is suitable and sufficient for the activity. They must take account of the individual, the location, the equipment and/or materials to be used and any emergency situation that could arise.

Work Supervisor must consider the following points during the risk assessment process (further guidance is available below):

- Remoteness and Isolation
- Communications and personal alarms
- Supervision and monitoring
- Medical suitability
- Emergency situations
- Information and training
- Out of hours controls
- Management of change (activity, location etc.)

## Communications and personal alarms

It should be ensured that appropriate communications are maintained with the lone worker, especially when continuing supervision is required. The lone worker should be equipped with a means of two-way communication, a pager or a personal alarm.

The system should enable the worker to raise an instant alarm or be located accurately if assistance is required.

Automatic warning devices, which operate if specific signals are not received periodically from the lone worker, are also available. It should be remembered that mobile phones have limitations such as restrictions of the work environment, battery life, signal strength and incapacity of the lone worker.

## Supervision and monitoring

Although lone workers cannot be subject to constant supervision, there is a duty on the company to provide appropriate control of the work. The extent of required depends on the risks involved and the ability of the lone worker to identify and handle health and safety issues. The higher the risk, the greater the level of supervision required.

Procedures must be in place to monitor lone workers and ensure they remain safe. This may include:

- Periodic visit and observations of people working alone from Supervisors.
- Maintaining contact with lone workers using either a telephone or radio. Contact arrangements should be documented as part of the risk assessment and should include communication protocols when commencing and finishing work and returning to base / home.
- 

The use of signing-in/logging system is useful for monitoring the safety of lone workers. Signing-in can be used as part of a monitoring system at sites that are regularly patrolled by security staff outside normal hours. However, in such situations, there must be an agreement with the security staff about their monitoring role; it cannot be assumed that they will carry out this function.

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Contingency plans specifying the action to be taken should a pre-arranged contact not be made, or an alarm device operated, should be included as part of the risk assessment.

## Medical suitability

The Company Director shall consider whether the job imposes any extra demands on the lone worker's physical or mental stamina and if the lone worker suffers from any illness that might increase the task risks.

Both routine work and foreseeable emergencies may impose additional physical and mental burdens on the individual.

## Emergency situations

The risk assessment should identify foreseeable events, and emergency procedures should be established, and employees trained in them, consideration should be given on how to communicate if the operatives' first language is not English.

Lone workers should be capable of responding promptly and correctly to emergencies and should have access to adequate first-aid facilities (the risk assessment may indicate that lone workers need training in first aid). In addition, those persons designated to respond in such an event must be available at all times specified and must act promptly and in accordance with the agreed system.

## Information and training

Sufficient training and information must be provided to a lone worker to enable him/her to identify hazards and take appropriate action to avoid them. She/he must be entitled to leave the workplace if there is serious and imminent danger. Training is particularly important where there is limited supervision to continuously guide and help in situations of uncertainty

In addition to this guidance, the Health and Safety Executive document, Working Alone (INDG 73), can be used as a further source of information.

## Out-of-hours

The main issue is the type and level of control measures that are necessary in order to maintain well-being when undertaking out of hours working. Should the risks be considered too high for out-of-hours working by third party individuals owing to lack of supervision, London Railway Limited Trading As Wastesure should arrange for competent supervision to be provided and subsequent health and safety provisions to be made as necessary?

It is imperative that out-of-hours working is agreed in advance and that all hazards and risks in addition to those posed by lone working, are identified. A Safe System of Work should be developed and include risk assessments and method statements, emergency procedures, site briefings (to include 'no go areas', etc.) and communications.

On contracts where out-of-hours working is likely owing to a client's need to have 24-hour access to deal with emergencies, for example, the interface with project out-of-hours status should be agreed between all relevant parties and written down in the form of a Safe System of Work.

## Key Documentation to comply with this Policy

Lone Working internal audit pro-forma

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## Manual Handling

Manual handling operations mean any transporting or supporting of a load (including the lifting, putting down, pushing, pulling, carrying or moving of it) by hand or by bodily force. Many people hurt backs, arms, hands or feet lifting everyday loads, not just when the load is too heavy. Up to 2012, around a third of all over-three-day injuries reported to the Health and Safety Executive (HSE) and to local authorities were the result of manual handling activities.

Work-Related Upper Limb Disorders (WRULD's) can happen in almost any workplace where people do repetitive manual handling activities or work in awkward postures for prolonged periods of time or as a result of one-off incidents.

Early symptoms may be temporary muscular aches and pains, but if such work is not properly managed, they can develop into chronic and disabling disorders. Cumulative damage can build up over time, causing pain and discomfort in necks, backs, shoulders, arms, hands or fingers.

Most cases could be avoided by the provision of suitable and regularly maintained mechanical aids together with relevant training on using the equipment safely and manual handling.

To ensure that manual handling activities are undertaken safely and that safe system of work is clearly understood throughout the company, we will:

- Identify all manual handling operations and activities undertaken by our employees;
- Complete an initial appraisal of all operations to determine if a risk of injury to employees is present;
- Avoid, wherever possible, manual handling tasks where there is a risk of injury to employees;
- Complete a detailed assessment of each manual handling operation if the risk is unavoidable;
- Develop safe systems of work;
- Inform all employees involved in manual handling operations of any possible risks and how these can be avoided;
- Provide employees with sufficient information, instruction and training on approved, safe manual handling techniques to ensure their health and safety whilst undertaking tasks;
- Deliver appropriate training in the use of any mechanical aids employees are expected to use;
- Ensure appropriate health checks are made on the individuals performing the tasks, especially vulnerable people, and ensure that employees bring to our attention any changes in their own medical conditions; and
- Periodically assess accident records to identify any trends in musculoskeletal injuries and ensure that serious injuries are appropriately reported.

### Key Documentation to comply with this Policy

Manual Handling internal audit pro-forma

Manual handling risk assessment

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## Monitor, Audit and Review

Performance monitoring is a proactive, as well as reactive, process that enables a business to monitor and measure its health and safety performance. Performance monitoring also measures the effectiveness of the safety management system, which is important to the business for several reasons, among them, financial, moral and legal. This policy and arrangements will be reviewed on at least an annual basis. A provision will also be made to undertake a review in the event of the introduction of new, or the amendment of existing legislation, codes of practice or guidance notes.

London Railway Limited Trading As Wastesure recognises the need for regular safety inspections and will ensure that these are undertaken and recorded. The Health and Safety at Work etc. Act 1974 requires that the Company Health and Safety Policy and its implementation be monitored and reviewed as necessary.

The Management of Health and Safety at Work Regulations 1999 require the monitoring and review of arrangements to achieve progressive improvement.

All employees are encouraged, and expected, to bring to the notice of the Director any areas where the Company Policy on Health, Safety and Welfare appears to be inadequate or requires clarification.

All accidents will be investigated to enable the company to learn from these experiences and put effective controls in place to prevent a reoccurrence.

Where external assistance is required, the Director shall liaise with external Health and Safety Advisors, the Health and Safety Executive, Building Employers Confederation and other professional bodies, and actively seek advice and information regarding changes in Health, Safety and Welfare legislation and new or revised working practices.

Expert advice will be sought and taken as and when necessary, through a full and thorough yearly audit and regular safety inspections carried out to examine, develop and improve health and safety controls, techniques and applications already in place.

Monitoring shall be carried out on a daily basis by the management team on regular site visits and formally by an external Safety Advisor at regular intervals, dependent on the complexity of the project.

To ensure that all our work activities are undertaken with due regard for the health, safety and welfare of all our employees, it is of paramount importance that our policy on performance monitoring is clearly understood throughout the company. Consequently, we will:

- Review accident, incident and near-miss statistics and ensure remedial actions have been completed;
- Review results of regular health and safety inspections of the workplace and ensure that all agreed remedial actions have been completed, within agreed timescales;
- Review training records to ensure employees have been provided with adequate information, instruction and training to carry out their job roles;
- Ensure that an annual safety audit is undertaken which will be a detailed and analytical review of the management of health and safety across all the areas of the company;
- Set company objectives for the next 12 months; and
- Review, and amend as necessary, our health and safety policy at least annually or more frequently if significant changes occur.

### Key Documentation to comply with this Policy

Workplace inspection form

H&S Policy Internal Audit pro-forma

Management system audit form

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## Noise at Work

Noise at work can cause temporary or permanent hearing loss. People often experience temporary deafness after leaving a noisy place but usually recover their hearing within a few hours. Permanent hearing damage can be caused immediately by sudden, loud, explosive noises, for example, from guns or cartridge-operated machines, but hearing loss is usually gradual due to prolonged exposure to noise. People may only realise how deaf they have become when damage, caused over the years by noise, combines with hearing loss due to ageing. Hearing loss is not the only problem. People may develop tinnitus (ringing in the ears), a distressing condition that can lead to disturbed sleep.

The Control of Noise at Work Regulations have laid down key limits to noise exposure. These are:

Lower exposure action values:

- Daily or weekly exposure of 80 dB(A)
- Peak sound pressure of 135 dB(C)

Upper exposure action values:

- Daily or weekly exposure of 85 dB(A)
- Peak sound pressure of 137 dB(C).

To ensure that we prevent or reduce risks to health and safety from exposure to noise at work and that our policy will be clearly understood throughout the company, we will:

- Identify all operations within the business where there is a noise risk and who is likely to be affected;
- Carry out an initial noise survey if the level of noise is likely to be above the lower exposure action value although this is generally not applicable to Office Environments whoever, external work could increase the level of noise within the company premises.
- Ensure that the risks to employees from noise at work are assessed by a competent person, where we have identified a potential problem;
- Take the necessary action to reduce the noise exposure that produces these risks, ensuring that the legal limits of noise exposure are not exceeded;
- Provide employees with suitable hearing protection (see the personal protective equipment (PPE) policy) where noise exposure cannot be reduced enough by using noise control techniques;
- Provide our employees with adequate information, instruction and training in order to understand the noise risks that they may be exposed to and how to use noise control techniques and the hearing protection provided;
- Carry out health surveillance where the noise risk assessment has identified there is a risk to health; and
- Review, and amend as necessary, the noise risk assessment on an annual basis, when significant changes or accidents occur or when we have any reason to believe the assessment is no longer valid.

## Key Documentation to comply with this Policy

Noise at Work internal audit pro-forma

Noise annual Health assessment

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## Occupied Premises

Where the London Railway Limited Trading As Wastesure is involved with work in occupied premises care will be taken for the Health and Safety of the Occupier whilst the work is in progress.

We will operate within the conditions of the Client's contract and liaise with the Occupier and advise them on the work to be carried out and an approximate time scale for the contracted works.

Company operatives will wear any security / ID card if required by the Client.

All London Railway Limited Trading As Wastesure operatives will be competent to undertake all tasks required in an occupied property and will adopt all emergency procedures put in place by the Client or Occupier.

During the work, the operatives will not leave any materials or debris where it may become a trip hazard.

All reasonable precautions will be taken to obviate the impact when carrying out dusty and noisy operations; at all times, they will be carried out with care and consideration.

The operatives will ensure that the property is left tidy during the works, to reduce the risks of injury to the occupier and the general public. Barriers and screens will be utilised and occupants made aware of any changes to hazardous areas throughout the working day.

Particular emphasis will be placed upon:

- Fire evacuation routes.
- The position and location of fire fighting equipment.
- Emergency evacuation procedures.
- Special circumstances relating to the personnel working within or visiting the premises.
- Safety plans specific to the building or any part of the building.
- Maintaining fire compartmentation standards.
- Permit to work conditions.

### Key Documentation to comply with this Policy

Occupied Premises internal audit pro-forma

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## Office work

Offices can be hazardous places. The major causes of accidents in offices are:

- Slips, trips and falls.
- Manual handling.
- Electrical equipment.

## Lighting

All office areas shall be fitted with Sufficient lighting (either natural or artificial), to enable tasks to be completed safely. Windows shall be regularly cleaned, and light fittings maintained at regular intervals.

## Access and egress

Office areas shall be laid out in the most appropriate way ensuring that each person has sufficient space and that they are offered unobstructed passageways. Electrical cables shall be positioned where tripping hazards are avoided.

Material and other obstructions shall be kept clear of passageways, in particular cables and stationery boxes, which can cause trips and falls. If it is necessary to leave material in accesses for short periods, make sure there is alternative access and identify the obstruction to highlight the danger.

## Display Screen Equipment

Please refer to the Display Screen Equipment section of this policy.

## Electrical equipment

All Operatives shall ensure that they:

- Never tamper with electrical equipment or attempt to make repairs.
- Report electrical faults to the Managing Director immediately, so timely repairs can be carried out by a competent person.
- Always ensure that covers and doors protecting electrical apparatus remain securely in place. Keep trailing electrical cables to a minimum to avoid creating tripping hazards. If cables have to cross passageways or traffic routes, cover them with a cable ramp to avoid tripping.
- Do not enter a switch room or substation unless authorised to do so. If you do have occasion to enter, read carefully the information displayed.
- Always check equipment and cables for loose connections and exposed wiring before use and report any damage at the soonest opportunity.
- Do not overload circuits – check that the supply can safely deliver the electrical load required.

## Seating

Suitable seats shall be provided for sedentary workers, and seats for typists and display screen users shall be fully adjustable to ensure comfortable postures. Footrests will be provided where necessary.

## Welfare and First Aid

Sufficient first aid equipment under the control of a trained first aider or appointed person shall be provided at each office. Adequate washing and toilet facilities shall be provided, and there shall be means provided for making hot drinks and taking refreshments. A reasonable temperature of 16°C shall be maintained, as a minimum throughout the working day.

## Lifting and Carrying

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Lifting and carrying heavy or awkward objects shall be avoided where possible. Loads shall be broken down to the smallest unit practicable for carrying. Steps or hop-ups shall be provided for access to high-level shelves, etc.

## Contractors and Visitors

If contractors and visitors enter the offices and seem uncertain about correct procedures, refer them to the Company Director.

If contractors or visitors are observed acting unsafely, report it to the Company Director or Supervisor accordingly.

## Key Documentation to comply with this Policy

Office Work internal audit pro-forma

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## Personal Protective Equipment (PPE)

The need to wear or use personal protective equipment shall be assessed at each workplace or site, and for each particular activity. Where it is not reasonably practicable to control exposure to hazards by any other means, London Railway Limited Trading As Wastesure will provide suitable PPE free of charge.

London Railway Limited Trading As Wastesure will determine where, when, and what PPE needs to be used when we conduct risk assessments. We will also identify any standards that apply to the PPE that Operatives will need to use.

Items of PPE will be selected to be compatible and, wherever possible, you will be consulted during the selection process. Where the protection of London Railway Limited Trading As Wastesure's Operatives' health relies on the use of respiratory protective equipment (RPE) with a tight fitting face mask, London Railway Limited Trading As Wastesure will arrange for a face-fit test to be carried out by a competent person.

If any Company Operative is required to use PPE, we will ensure that you are instructed in its use, maintenance and storage and, where necessary, that you are provided with written information. You will also be told how you can obtain replacements. PPE damaged through natural wear and tear will be replaced free of charge. All PPE provided shall be stored within the provided PPE kit bag and stored within lockers (Head Office or on-site) or in the company vehicle when not in use.

London Railway Limited Trading As Wastesure provides any necessary protective clothing and equipment. This must be worn at all appropriate times. Failure to comply will lead to disciplinary action and ultimately could result in dismissal.

Areas that require specific PPE, for example, Hearing Protection, will be clearly marked with appropriate warning signage in accordance with the Health and Safety (Signs and Signals) regulations on display in a prominent location.

London Railway Limited Trading As Wastesure identifies PPE as a last line of defence and actively looks to reduce the risk to employees through assessing the hazards present and implementing control measures to eliminate the risk where possible.

To ensure that the use of PPE will be undertaken safely and that our policy will be clearly understood throughout the company, we will:

- Identify all operations and activities that may require the provision of PPE;
- Avoid, wherever possible, the requirement for PPE by introducing other risk control measures;
- Ensure our risk assessments identify the need for PPE as a control measure, where relevant, and that they take into consideration fit, comfort and compatibility with other items of PPE used simultaneously;
- Train all employees in the risks presented by their work activities and how these can be controlled by using PPE in the correct manner;
- Arrange for adequate accommodation for the correct storage of PPE;
- Implement steps for the correct maintenance, cleaning and repair of PPE, according to manufacturers' instructions;
- Implement a fault reporting system for employees to report broken or damaged PPE;
- Replace PPE provided as necessary and at no cost to the employee;
- Monitor the use of PPE in the workplace to ensure it is being worn correctly as outlined in the risk assessment process; and
- Review, and amend as necessary, risk assessments on an annual basis, when significant changes or accidents occur or when we have any reason to believe the assessment is no longer valid.

### Key Documentation to comply with this Policy

PPE issue record

PPE internal audit pro-forma

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## Recruitment, Training and Competence

### Recruitment

When a position becomes vacant, or a new position is to be established, (either temporary or permanent) the London Railway Limited Trading As Wastesure. Company Director must ensure that the following documentation is completed and authorised where necessary before any recruitment activities begin.

- Job description detailing key activities
- Person specification detailing experience, qualifications and any special skills required.

An advertisement will then be placed in the local press or other suitable trade magazine stating that the company is an equal opportunities employer. Such advertisements will avoid any bias in respect of race, age, sex, marital status or disability in accordance with the Commission for Racial Equality (CRE) code of practice.

Consideration will be given to placing job advertisements in specific publications as advised by relevant bodies. Applications for job-sharing will be considered where it is reasonable for such a job to be shared by two people or more.

Where CV's are a requirement for shortlisting, these will be reviewed by the Company Director.

London Railway Limited Trading As Wastesure will give full and fair consideration to all applicants for employment. Interviews shall be conducted by the Company Director, where a specific skill or aptitude is required any testing must be carried out prior to any offer of employment. Those involved in the selection process will ensure that there is no unfair discrimination and that shortlisting and selection criteria are relevant to the post under consideration

All personnel involved in the interview process must have received training or be suitably experienced in the interview process if, in doubt, advice should be obtained from the Company Director.

### Training and Competence

London Railway Limited Trading As Wastesure aims to communicate all health and safety information to employees to ensure that they are aware of the hazards within the workplace and to maintain a safe working environment. Safety training will be provided where necessary to enable employees to carry out work safely.

London Railway Limited Trading As Wastesure endeavour to:

- Identify the training needs of employees;
- Provide employees with health and safety training where necessary;
- Employ competent personnel and ensure to the best of its abilities that all work is carried out safely;
- Ensure that all employees and subcontractors receive induction training prior to commencing work on-site;
- Ensure that all employees and subcontractors receive regular toolbox talks and health & safety briefings to communicate information and maintain focus on health and safety at work;
- Maintain records of induction training and toolbox talks;
- Review and monitor performance.

We recognise that as well as being a legal requirement, the provision of suitable and sufficient training and instruction is an essential part of ensuring that you know how to work safely and avoid risks to your health. The purpose of this procedure is to outline the arrangements we operate to ensure that you are provided with such training.

All new starters will receive a company induction on their first day. This will cover, but will not be limited to, the following:

- Fire and emergency procedures.
- First aid arrangements.

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- Welfare arrangements.
- Arrangements for consulting employees on health and safety.
- Arrangements for raising health and safety concerns.
- Accident and incident reporting.
- Our health and safety rules.

Following Induction, employees will receive instructions regarding the tasks that they will be required to perform. At this stage, a skills evaluation will be carried out and, where appropriate, training needs identified. Where training needs are identified, a training programme will be agreed on.

## Performance evaluation

This is the process during which the progress, performance results and sometimes personality of an employee are evaluated by his immediate superior. All 'permanent' employees are to be formally appraised on an annual basis with any training needs identified as being specific to the company's business objectives.

The employee appraisal form must be given to the employee at least fourteen days prior to the scheduled appraisal and instructed to submit the completed document to their immediate superior seven days prior to the appraisal interview.

Prior to the appraisal, the manager should obtain a copy of the job description (where available), and the employee's personnel file, which may contain pertinent information to the process.

During the interview, the manager conducting the interview must record his findings on the prescribed document, which is then signed by both parties. It must be remembered that the interview is a two-way process in which both parties must actively participate in talking and listening.

Objectives should be agreed for the forthcoming period, which may be used as performance indicators at the next appraisal interview.

Once completed, the appraisal forms must be returned to Human Resources for record-keeping purposes.

Any training needs identified are then reviewed at the next available management meeting or quality management review meeting and the individuals training plan modified accordingly.

## Key Documentation to comply with this Policy

Recruitment, Training and Competence internal audit pro-forma

Induction training record

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## Risk Assessment

A risk assessment is a careful examination of what, in our work and environment, could cause harm to people. It enables us to determine whether we have taken enough precautions or should do more to prevent harm. It is an important step in protecting workers and our businesses, as well as complying with the law. Risk assessments help us focus on the risks that really matter in our workplaces: the ones with the potential to cause harm. In many instances, straightforward measures can readily control risks.

London Railway Limited Trading As Wastesure recognise that the purpose of risk assessment is to identify significant hazards in order to ensure that risks are eliminated or reduced to the lowest reasonably practicable level (where more stringent duties are not enforced).

Any task or operation shall be subject to a risk assessment being undertaken before works commence. Where a foreseeable risk is identified, the Site Manager must ensure that a more formal risk assessment is undertaken, and the results of that assessment recorded.

Our target is to:

- Identify significant hazards to health and safety;
- Identify all persons at risk from the hazards identified;
- Ensure that controls are sufficient to reduce risks to acceptable levels;
- Where necessary to ensure that risks are controlled adequately, action further controls;
- Review risk assessments periodically, if the task has changed, following an accident or incident or there is any reason to suspect that an assessment is no longer valid;
- Record an individual risk assessment for each young person (16 -18 years of age) employed;
- Record an individual risk assessment for an Expectant Mother. An initial assessment will be recorded when we are informed. This will be reviewed monthly throughout the pregnancy and any period while she is breastfeeding after return to work;
- Obtain and approve risk assessments from sub-contractors engaged in working on our behalf before allowing work to commence;

### Key Documentation to comply with this Policy

Risk Assessment internal audit pro-forma

Return to work risk assessment

Expectant Mother risk assessment

Young Person risk assessment

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## Stress

Stress is defined as "the adverse reaction people have to excessive pressure or other types of demand placed upon them". Stress is not an illness in itself, but if prolonged or particularly intense, it can lead to increased problems with ill health, poor productivity and human error. There is a clear distinction between pressure, which can create a 'buzz' and be a motivational force, and stress, which can occur when this pressure becomes excessive. Workplace stress exists where people reasonably perceive that they cannot cope with what is being asked of them at work.

To ensure that all our work activities are undertaken with due regard for the health, safety and welfare of all our employees so far as is reasonably practicable and that our policy concerning stress is clearly understood throughout the company, we will;

- Regularly review productivity data, sickness absence records, staff turnover or other relevant information to find out whether there may be work-related stress issues;
- Undertake a detailed risk assessment to find out whether work-related stress is a problem;
- Provide information, training and support to managers on good management practices, and encourage the early referral of any employees who may benefit, to an occupational health service or employee assistance provider;
- Provide information to employees to increase their awareness of the causes and symptoms of stress, and the various areas of support available to them;
- Offer a confidential counselling service to managers and employees affected by work-related stress;
- Consider offering confidential counselling service to managers and employees affected by stress if caused by external factors;
- Provide return to work support for employees when returning from stress-related illness or any other enforced absence, and
- Monitor and review the effectiveness of this policy and any other measures we have in place to reduce stress and promote workplace health and safety.

## Key Documentation to comply with this Policy

Stress at Work internal audit pro-forma

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## Sub-Contractor Selection

London Railway Limited Trading As Wastesure may utilise sub-contractor labour on an as-required basis to perform specialist activities or for labour only support during periods of increased workload.

All Sub-Contractors are required to be:

- Competent to carry out the work for which they may be engaged;
- Provided with all the information they require to plan for the health, safety and welfare of their employees and anyone that could be affected by their work;
- Able to carry out any work in a manner that protects the health and safety of all who may be affected by the work.

Subcontractors are selected in accordance with our subcontractor requirements and pre-works questionnaire. We require relevant health and safety documentation, including training certificates, policies and insurances, along with project specific risk assessments and method statements for each contract awarded. The supplied documents will be reviewed to assess the competence of the subcontractor, along with ongoing monitoring processes (Labour only Sub-Contractors are excluded from providing Operational documentation).

Employees of subcontractors shall be trained and competent for any task that they are to undertake. Proof of their having received suitable safety training shall be provided to site management, prior to being allowed to start work.

The Company Director is responsible for approving subcontractors.

Subcontractors are responsible for providing risk assessments and method statements for the work for which they are engaged. Where work involves the use of hazardous substances, COSHH assessments must be accompanied by suppliers' safety data sheets (SDS), and copies of any atmospheric monitoring carried out as required by any COSHH assessment must also be supplied.

Subcontractors are responsible for providing evidence that persons working for them are suitably qualified and have received health and safety training.

When required to do so, subcontractors must release their employees to attend Site Induction and Toolbox Talks. The subcontractor is also responsible for ensuring that all persons under his control are aware of the following:

- Site Fire Procedures.
- Site First Aid Arrangements.
- Site Rules.
- Welfare Arrangements.

Subcontractors must ensure that all equipment used when working on behalf of the company is fit for the intended purpose and in a good state of repair and that persons that will use it have received suitable training. Where equipment is subject to statutory inspection, copies of the most recent examination certificates must be provided. This applies to equipment owned by the subcontractor and equipment obtained on hire.

Where a subcontractor will be using highly flammable liquids, liquefied petroleum gasses (LPG) or compressed gas cylinders they are responsible for providing safe storage for these when they are not in use.

Subcontractors are responsible for providing, maintaining and enforcing the use of any personal protective equipment (PPE) needed by persons working for them. Where the use of specialist equipment such as harnesses, fall arrest equipment and self-contained breathing apparatus is required, the subcontractor is responsible for providing copies of training certificates for all persons that will use such equipment.

Unless agreed in writing beforehand, subcontractors are responsible for ensuring that persons working for them have access to suitable first aid arrangements.

Unless agreed in writing beforehand, subcontractors are responsible for making arrangements for the safe disposal of any waste arising from their work, in accordance with current legislative requirements.

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A post-contract assessment will also be carried out on completion of each project for the purpose of reviewing and improving our own, and subcontractor performance. Subcontractors performing badly on the grounds of health and safety, quality, communication or delivery will be notified of a need for improvement. Recommendations for removing from our approved list may be made depending on the extent of the issues identified.

## Key Documentation to comply with this Policy

Sub-Contractor selection internal audit pro-forma

Pre-Works Sub-Contractor questionnaire

Post-Works Subcontractor assessment

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## Violence at work

London Railway Limited Trading As Wastesure operate a zero-tolerance approach to violence at work. Violence, both actual physical violence and verbal threats or behaving in a threatening manner, are considered negative to the working environment and will result in disciplinary action. Repeat offences or serious incidents are considered gross misconduct, which can result in dismissal.

All employees are encouraged to report, and grievances, disputes or issues to either the site or contracts manager. The grievance procedure will then be followed to ensure a satisfactory resolution.

### Key Documentation to comply with this Policy

Violence at work internal audit pro-forma

## Visitors

The following rules are designed to control all visitors to our premises, including contractors engaged in working on the premises. For health, safety and security reasons, it is important that visitors should not be permitted to wander freely around the premises. In the event of a fire, it is imperative that we know who was in the building at the time and that all persons can be accounted for. We will do this by maintaining a record of the name, time of arrival and departure and whereabouts of all visitors.

Any person receiving a visitor should ensure that:

- The visitor enters their details in the 'Visitors' Record Book' on arrival and signs out on departure.
- The visitor remains in the reception area until they are collected by their host.
- Any incident involving a visitor is reported to the Managing Director without delay. Injuries should be recorded in the Accident Book.
- The visitor reads and complies with the Fire Procedures.

### Key Documentation to comply with this Policy

Visitors internal audit pro-forma

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## Welfare Provisions

London Railway Limited Trading As Wastesure shall ensure that adequate welfare facilities are provided to reflect the site, size, number of employees and nature of the work to be carried out.

### Office Accommodation

There shall be provided on-site, where ever possible, a suitable office situated as near as is reasonably practicable to any area of operations, for the purpose of keeping site documents, drawings, works records, etc.

### Washing Facilities

We will provide or ensure the availability of suitable and sufficient units for employees to wash. Facilities shall include where practicable, warm running water and sufficient quantities of hand cleanser, soap and towels (or electric hand drier).

### Sanitary Conveniences

All sites shall be provided with suitable and sufficient toilet or toilets for the use of all employees, situated as near as is practicable from any area of operation. Portable toilets will only be used if mains water or drainage is unavailable or for very short duration works.

### Rest and Food Preparation areas

All sites shall be provided with a suitable unit for the use of employees to take breaks, refreshments, meals, and shelter from bad weather and for the deposit and secure storage of personal clothing and belongings. The unit shall be adequate for the number of employees on-site as identified in the pre-start assessment of requirements.

### First aid provisions

Unless dictated otherwise by a first aids needs assessment, At least one first aid kit will be available at each workplace to suit the number of employees present. The First Aid box shall be kept in the Site Office and be prominently displayed. So far as is reasonably practicable, a suitably trained First Aider shall be available at each workplace.

### Welfare cleanliness and hygiene

All office accommodation, toilets, mess and rest facilities, shall be kept clean and swept out and all rubbish, etc., removed at least once every day. Access to all site accommodation and units shall be kept clear of obstructions.

### Key Documentation to comply with this Policy

Welfare Provisions internal audit pro-forma

Welfare provision inspection





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London Railway Limited Trading As Wastesure	Mark Dunne	04.01.2022

## Workplace Signage

Signs, signals and symbols in the workplace are an important tool for informing workers and others who may be present of the hazards nearby, the precautions to be taken and the actions to be followed in the event of an emergency. Such signs, signals and symbols are not limited to graphical images. They may also include verbal or acoustic signals, for example, fire alarms, as well as other devices such as tape or barriers warning of hazardous areas or enclosures.

The Health and Safety (Safety Signs and Signals) Regulations were introduced to encourage standardisation of safety signs at work across the European Union, and they apply to all places and activities where people are employed. The regulations require employers to provide specific safety signs, hand signals or verbal communications whenever there is a risk that cannot be avoided or controlled by other means. There is no need to provide a sign where it would not help to reduce the risk or where the risk is not significant.

There are 4 basic categories of Safety Signage:

	Prohibition Signs are red in colour and indicate that certain behaviours are prohibited or must be stopped immediately. The sign is a red circle with a bar running through it on a white background. This symbolises STOP. An example is a No Smoking sign.
	Warning Signs are yellow in colour and give warning or notice of a hazard. The sign is a black outlined triangle filled with yellow. The symbol or text is always black. This symbolises CAUTION. An example is a hazard sign on a chemical bottle.
	Mandatory Signs are blue in colour and indicate that a specific course of action is required. The sign is a blue circle with white symbols or text. This symbolises that you MUST do something. An example is an Ear Protection sign.
	Safe Condition Signs are green in colour and provide information about safe conditions. These signs are rectangular or square in shape and are always green with white symbols or text. An example would be a first aid sign.

To ensure that the provision and use of safety signs and signals will be undertaken as appropriate and that our policy will be clearly understood throughout the company, we will:

- Carry out a detailed risk assessment to determine what safety signage is required;
- Display statutory notices in the workplace;
- Ensure other suitable and sufficient graphic signs are provided and maintained within the workplace;
- Ensure that the correct hand signals and verbal communications are used appropriately;
- Provide employees with adequate information, instruction and training on signage;
- Maintain and replace signage when necessary;
- Ensure that adequate resources are made available to fulfil the requirements of this policy; and
- Review this policy at least annually or more frequently if significant changes occur.

To fulfil our responsibilities as outlined above, we will:

- Ensure our relevant risk assessments have identified the need for safety signs as part of our control measures;
- Ensure signage identified in the risk assessments is displayed in prominent positions;
- Provide employees with sufficient information, instruction and training to ensure that they fully understand the meaning of signs and signals and recognise the colour coding of signage used in the workplace; and
- Regularly inspect signage to ensure it is in good condition and replace signs when necessary.

### Key Documentation to comply with this Policy

Workplace Signage internal audit pro-forma

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London Railway Limited Trading As Wastesure	Mark Dunne	04.01.2022

## Work at height

The aim of this policy is to ensure that working at height is suitably controlled in order to effectively managed along with actively improving our health and safety arrangements and to comply with relevant legislation.

Any place is classified as “At Height” if any person could be injured by falling from it, even if it is at, or below ground level.

“Work” is inclusive of moving around at a place of work (except for by a staircase in a permanent workplace), but not travelling to or from a place of work.

The Work at Height Regulations 2005 (As Amended 2007) apply to all work at height where there is a risk of a fall, liable to cause personal injury. They place duties onto employers, the self-employed, and any person who controls the work of other persons (e.g. Facilities Managers or building owners who may contract other persons to work at height), to the extent that they control the work.

Employees or persons working under someone else’s control, Regulation 14 states that you must:

- Report any safety hazards your employer or the person controlling:
- Correctly use all equipment provided (inclusive of safety devices), strictly adhere to any training and instructions (unless you estimate that it would be unsafe to do so, in which case, seek further instructions before continuing):

The Work at Height Regulations 2005 cover the following requirements:

Schedule 1: Existing places of work and means of access for work at height:

Schedule 2: Collective fall prevention (e.g. guard rails and toe boards):

Schedule 3: Working platforms:

Schedule 4: Collective fall arrest (e.g. nets, airbags, etc.):

Schedule 5: Personal fall protection (e.g. work restraints, work positioning, fall arrest and rope access):

Schedule 6: Ladders and step ladders:

Schedule 7: Inspection reports (for working platforms in construction only):

Schedule 8: Revocations:

## Use of System Scaffolds and Mobile Towers

To ensure overall compliance with the Work at height regulations 2005 regarding the use of ladders and step ladders, London Railway Limited Trading As Wastesure will:

- Follow the hierarchy of control measures determined within the Work at Height Regulations 2005 when planning any work at height.
  - Avoid work at height where possible
  - Use work equipment or other measures to prevent falls collectively where work at height cannot be avoided
  - Where the risk of a fall cannot be eliminated, use work equipment or other measures to minimise the distance and consequences of a fall
- Carry out a risk assessment for all work at height and prepare method statements.
- Organise and plan work at height, so it is carried out safely.
- Ensure that system scaffold and tower scaffolds are erected, altered, moved and dismantled by competent persons and in accordance with the manufacturer's instructions.
- Make sure system scaffold and mobile towers are placed on a firm, level ground with the locked castors or base plates properly supported.
- Check the safe working height by referring to the instruction manual and never go above those recommended by the manufacturer.
- Install stabilisers or outriggers when advised to do so in the instruction manual.
- Provide a safe way to get to and from the work platform, e.g. On the inside of the tower by an appropriately designed built-in ladder.
- Provide a safe working platform with suitable edge protection and toe boards.

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- Carry out inspections of system scaffold and mobile towers after assembly in any position, after any event liable to have affected its stability, and at suitable intervals depending on frequency and conditions of use- usually every 7 days.
- Carry out pre-use checks by trained and competent persons if system scaffold and mobile towers have been moved, and guard rails or other components have had to be removed to enable the tower to be moved past an obstruction.
- Stop work if an inspection shows it is not safe to continue and put right any faults.
- Record the results of inspections and keep until the next inspection is recorded.
- Erect barriers at ground level to prevent people from walking into the tower or work area. Minimise the storage of materials and equipment on the working platform and remove or board over access ladders to prevent unauthorised access if scaffold towers are to remain in position unattended.
- Provide competent supervision for work at height, reflecting the degree of risk in the particular operation.
- Carry out supervisory checks and monitor that safe systems of work are being adhered to.

## Use of Ladders and Step Ladders

To ensure overall compliance with the Work at height regulations 2005 regarding the use of ladders and step ladders, London Railway Limited Trading As Wastesure will:

- Follow the hierarchy of measures determined within the Work at Height Regulations 2005 when planning any work at height.
  - Avoid work at height where possible
  - Use work equipment or other measures to prevent falls where work at height cannot be avoided
- Where the risk of a fall cannot be eliminated, use work equipment or other measures to minimise the distance and consequences of a fall should one occur
- Carry out risk assessments for all work at height and ensure that suitable and sufficient control measures are in place to protect all site personnel and any other person affected.
- Prioritise ladders as the last choice when selecting means of access or place of work. Only use if more suitable work equipment is not reasonably practicable due to the low risk and short duration of work (between 15 and 30 minutes depending on the activity), or for low-risk work.
- Provide the correct type of ladder- class 1 industrial or EN131 and ensure that they are strong enough for the task and regularly inspected.
- Only use ladders in good condition with feet firmly attached, good tread, clean rungs, undamaged stiles and secure fastenings when extended.
- Make sure ladders are used on firm level ground, properly secured and set at the correct length and angle for the work.
- Ensure persons carrying out activities involving ladders are aware to retain three points of contact with the ladder at all times, stay centrally within the stiles of the ladder and carry tools in a bag or holster to leave both hands free.
- Ensure that persons carrying out work involving ladders are aware not to overload the ladder, over-reach or use the top three rungs of a ladder or the top two steps of a stepladder.
- Carry out training and adequately assess all personnel planning, supervising and carrying out work involving ladders, steps, and staging to ensure that they are fit, adequately trained and competent to carry out that work.
- Ensure that ladders, steps and staging are erected, altered, moved and dismantled by competent persons and in accordance with the manufacturers' instructions.
- Only use podium steps whilst brakes are applied.
- Make sure staging is set on a firm base with only one working platform and that barriers, guard rails and toe boards are provided.
- Only use podium steps and staging that is completely stable and provide a safe means of access to the working platform.
- Individually mark ladders, podium steps and staging to uniquely identify them and carry out regular inspections.
- Provide competent supervision for work at height, reflecting the degree of risk and personnel involved in the particular operation.
- Carry out supervisory checks and monitor that safe systems of work are being adhered to.

## Working over or near water

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To fulfil our responsibilities in respect of working on or near water, London Railway Limited Trading As Wastesure will:

- Follow the hierarchy of measures detailed within the Work at Height Regulations 2005 when planning any work at height.
  - Avoid work at height where possible
  - Use work equipment or other measures to prevent falls collectively where work at height cannot be avoided
  - Where the risk of a fall cannot be eliminated, use work equipment or other measures to minimise the distance and consequences of a fall should one occur
- Carry out risk assessments for all work over or near water and develop written method statements.
- Carry out work only when weather conditions do not endanger the health and safety of workers.
- Organise the site to ensure that all practical measures are implemented to reduce the risk of persons accidentally entering the water.
- Select, provide and ensure that the correct equipment is used for the job.
- Carry out training and assess all employees planning, supervising and carrying out work over or near water to ensure that they are adequately trained and competent.
- Provide competent supervision for work over or near water, reflecting the degree of risk.
- Display warning notices near to all edges.
- Provide employees with suitable personal protective equipment.
- Provide suitable and sufficient rescue equipment and competent persons. Develop emergency rescue plans and carry out emergency rescue drills.
- Carry out pre-use checks and maintenance in accordance with manufacturer's instructions and servicing of buoyancy equipment. Provide appropriate, dry storage arrangements.
- Provide adequate lighting as required.
- Carry out supervisory checks and monitor that safe systems of work are being adhered to.
- Ensure the availability of a sufficient number of qualified first aid personnel.
- Make arrangements to check the fitness of employees.

## Key Documentation to comply with this Policy

Work at height internal audit pro-forma

Ladder and Step ladder inspection

Company Name	Signed by	Review due date
London Railway Limited Trading As Wastesure	Mark Dunne	04.01.2022

## Work equipment

Work equipment includes all machines, equipment and tools used by employees in the course of their work, whether owned by London Railway Limited Trading As Wastesure or obtained on loan or hire.

We accept our duties under the current edition of the Provision and Use of Work Equipment Regulations (PUWER) and will take all reasonably practicable steps to ensure that the work equipment that you use is suitable for its intended purpose and will not put your health and safety at risk.

Work equipment shall be selected taking into account the conditions under which it will be used and the risks to which it may expose the operator of the equipment and anyone that may be affected by the way in which it is used. The selection of work equipment will take account of the following:

- Work equipment to be suitable for the task and workplace conditions.
- Work equipment to be adequately maintained.
- Work equipment to be inspected at regular intervals.
- Specific risks associated with certain activities to be identified and reduced.
- Information and instructions to be given to the users.
- Protection from a dangerous part of the machinery.
- Protection against specified hazards.
- Protection against high or very low temperatures.
- Safe starting and stop controls on machinery.
- Isolation from sources of energy.
- Stability of work equipment.
- Adequate lighting.
- Safe maintenance operations.
- Any markings referring to health and safety must be clearly visible.
- Work equipment to have appropriate warnings or warning devices.
- No employees carried on work equipment unless it is suitable for carrying persons and incorporates features for reducing risks to persons.
- Risks from overturning work equipment whilst riding are minimised, e.g. Roll over protection and restraint belts.
- Risk of overturning of forklifts to be specifically assessed and reduced.
- Protection to employees from self-propelled and remote-controlled equipment.
- Protection to employees from drive shafts.

Note: Although covered by PUWER, items of work equipment such as cranes and scaffolding are covered in other pieces of legislation. Compliance with these more specific pieces of legislation, therefore, takes precedence, e.g. Cranes – LOLER and BS7121, Scaffolding (Work at Height Regulations 2005).

Where specific hazards are identified, the use of equipment will be restricted to those employees given the task of using it. You will be provided with any information, instruction and training that you need to use work equipment safely.

The Company Director is responsible for ensuring that work equipment is inspected at suitable intervals and maintained and that suitable records are kept. This includes ensuring that any statutory examinations are completed on time. Where the need for maintenance is identified, the work will be subcontracted to an approved supplier.

The Company Director and Works Supervisor are responsible for ensuring that machines and equipment are operated only by persons who have been authorised to do so and who are sufficiently trained and competent in the use of the equipment. We are also responsible for withdrawing damaged equipment from use until it has been repaired or replaced.

Employees and Sub-Contractors are responsible for using machines and equipment in accordance with training provided. Any machine fitted with a guard to prevent contact with moving parts must not be operated with the guard removed or disabled. Machines must not be adjusted when they are running unless the manufacturer has made specific provision for such adjustment.

To ensure that all work equipment provided is fit for purpose and that all necessary inspection and maintenance records are kept up to date, we will:

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- Ensure existing or new equipment is clearly labelled with a conformité européenne (French for European conformity) marking, where appropriate. This is always abbreviated to a 'CE' marking;
- Install equipment and ensure that it is located and used so as to minimise the risk to operators and others;
- Identify all the equipment available for use;
- Assess the risks created from the use of work equipment and eliminate or control them, where practicable;
- Develop safe systems of work;
- Provide the necessary information, instruction and training for employees who use work equipment and, where necessary, appoint them in writing;
- Ensure that all work equipment provided is regularly maintained and tested under statutory requirements or manufacturers' instructions, where applicable, using competent contractors where necessary;
- Communicate, to all employees, instructions for the reporting of defects and faults and ensure that they are adhered to and that any faulty equipment is removed from use and replaced as soon as possible; and
- Periodically assess accident records to identify any trends in work equipment accidents and ensure that serious injuries are appropriately reported.

## CE Marking of equipment

There are 20 categories of equipment that require a CE Mark to be applied

Appliances Burning Gaseous Fuels (Appli Gas)	Cableway Installations to Carry Persons	Low Voltage Electrical Equipment
Construction Products	Equipment and Protective Systems for Use in Potentially Explosive Atmospheres (Atex)	Explosives for Civil Uses
Hot Water Boilers	Lifting Equipment	Machinery (as defined in the Machinery Directive (89/392/EEC))
Measuring Instruments	Medical Devices	Active Implantable Medical Devices
In Vitro Diagnostic Medical Devices	Non-automatic Weighting Instruments	Radio and Telecommunications Terminal Equipment (R&TTE)
Personal Protective Equipment (PPE)	Simple Pressure Vessels	Pressure Equipment
Recreational Craft	Toys	

## The hiring of plant and equipment

London Railway Limited Trading As Wastesure shall obtain all relevant health and safety and operating instructions, e.g. erection instructions for tower scaffolds, and noise and vibration information for handheld drills etc.

Users of the equipment should not assume the equipment has been provided complete - ensure all components are provided with the equipment. Carry out a check of the equipment before it is used. The equipment should have been inspected and tagged by the hiring company but do not assume this to be the case and check for obvious defects.

Once on hire equipment (and users) are the responsibility of site management, carry out frequent checks to ensure the equipment is being used properly by competent persons.

Ensure that persons using the equipment are trained and competent and have been briefed on the importance of reporting defects to their supervisor immediately.

## Privately owned equipment

Privately owned equipment used for work is legally regarded as work equipment and must conform to the same rules. Any persons requesting the use of personal equipment shall seek permission from the Company Director prior to use.

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Acceptance of the use of privately owned equipment shall be determined on a case-by-case basis at the discretion of the Company Director.

## Key Documentation to comply with this Policy

Work Equipment internal audit pro-forma

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## Young Persons (Including Trainees and Work Experience)

Trainee and work experience programmes represent a significant step in preparing young people and children, under the minimum school leaving age (MSLA), for adult and working life. Not only do they introduce them to the workplace, but they also provide an opportunity to foster an early understanding of the importance of health and safety, and to influence the attitudes of the future workforce.

Young people may be more at risk to their health and safety at work due to lack of experience, lack of awareness of hazards within the workplace or immaturity.

A Young person is defined as “An employee or work placement student who has not attained the age of eighteen”.

A Child is defined as “A person who is not over the compulsory school leaving age (16)”.

The Health and Safety at Work etc. Act 1974 requires employers to ensure the health and safety of all employees at work and anyone else who may be adversely affected by the employer’s undertaking, so far as is reasonably practicable.

The Management of Health and Safety at Work Regulations 1999 require employers to assess the work-related risk of all their employees and require a specific assessment of risks to young persons. Usually, the measures taken to protect the workforce should be sufficient to protect young persons; however, where this is not the case, additional measures should be determined and implemented before the young person commences work. In extreme cases, this may mean prohibiting young persons from certain work activities.

A young person has the right to expect that the employer has undertaken a suitable risk assessment. Employers must also provide the young person or the parents or guardians of children in employment with comprehensive and relevant health and safety information on the risk assessment and associated preventative and protective measures.

Under the Health and Safety at Work etc. Act 1974, employees have a responsibility for their own health and safety, and this needs to be significantly emphasised to young persons as they are relatively immature and more likely to make decisions without being aware of the possible consequences.

The Management of Health and Safety at Work Regulations 1999 require employers to take the following factors into account when undertaking a young person’s risk assessment:

- Their inexperience and immaturity
- Their lack of awareness of risks to their health and safety
- The fitting out and layout of their workstation and workplace
- The nature, degree and duration of any exposure to biological, chemical or physical agents
- The form, range, use and handling of work equipment
- The way in which processes and activities are organised
- Any health and safety training given or intended to be given
- Risks associated with certain specified agents, processes and work activities

To fulfil our responsibilities as outlined above, we will:

- Inform our insurance company of our intention to run trainee and work experience placements;
- Identify how many trainee and work experience students we have in our workplace;
- Identify all tasks, operations and activities undertaken by our trainees and work experience students;
- Complete a detailed assessment of each task or operation if the risk is unavoidable;
- Inform parents, guardians or others responsible for trainees and work experience students below MSLA, of key findings of risk assessments and the control measures we have taken;
- Provide trainees and work experience students with sufficient information, instruction and training to ensure their health and safety whilst undertaking tasks;
- Provide suitable levels of supervision;
- Liaise closely with the training organisation or work experience organiser to ensure their satisfaction with our management of health and safety; and
- Periodically assess accident records to identify any trends in accidents relating to trainees or work experience students and ensure that serious injuries are appropriately reported.

Company Name	Signed by	Review due date
London Railway Limited Trading As Wastesure	Mark Dunne	04.01.2022

## Key Documentation to comply with this Policy

Young Person Internal Audit pro-forma

Young Person's Risk Assessment

Company Name	Signed by	Review due date
London Railway Limited Trading As Wastesure	Mark Dunne	04.01.2022

# London Railway Ltd T.A Wastesure - Health safety and environmental policy statements and arrangements

Final Audit Report

2021-02-15

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