



Cleansing Service Group Ltd

HEALTH & SAFETY POLICY DOCUMENT

**Issue: February 2025
Review: 1 year**



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SECTION 1

Corporate Health & Safety Policy Statement



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Purpose

CSG is committed to the effective management of Health and Safety across the Group. We aim to reduce risks so far as reasonably practicable to prevent accidents, injuries, ill health, unsafe acts and unsafe conditions.

This requires our commitment to continuously improving our health and safety performance to provide a safe and healthy work environment which protects employees, contractors, customers and visitors, whilst ensuring as far as reasonably practicable compliance with current regulations and legislation regarding health and safety.

Key Commitments

We will accomplish this through commitments to:

- Promoting and driving an innovative and positive Health and Safety culture throughout the organisation
- Engaging the whole work force in Health and Safety matters
- Visible and active commitment from management to lead by example
- Placing a high priority on Health and Safety considerations in managing our business and integrating Health and Safety thinking into all business processes
- Providing relevant Health and Safety training and supervision, safe plant and equipment
- Eliminating hazards and reducing risks wherever practicable
- Encouraging and supporting the reporting of near misses and safety observations
- Positive intervention when observing unsafe acts or conditions
- Supporting the mental health of our staff
- Recognising and learning from all accidents, incidents, near misses & observations and acting decisively to eliminate future risk as far as reasonably practicable.
- Setting, monitoring and reviewing Health & Safety objectives and actions to ensure improvements are implemented.
- Identifying and mitigating health and safety risks through co-operation with stakeholders
- Reviewing the performance of our control measures to ensure they are suitable and sufficient
- Providing the required resources and support to achieve the above

Responsibilities

The Board of Directors agrees objectives against each of these pillars on an annual basis which are delivered through line managers, supported by health & safety managers, with a process for monitoring progress against them. Every employee within the Group has responsibilities for Health and Safety as outlined in document CM 4.01 T2 "Health and Safety Responsibilities". In addition to this, CSG encourages and supports all staff to take personal responsibility for their own Health and Safety and that of those around them.

Arrangements

This policy will be delivered through an effectively implemented management system, providing adequate resources to enable our people to effectively contribute to their delivery by promoting improvements and managing business risk. CSG is ISO 45001:2018 certified.

Authorisation

This Policy has been authorised by:

Neil Richards,
Managing Director, Cleansing Service Group Ltd.

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SECTION 2

Organisation for Health & Safety



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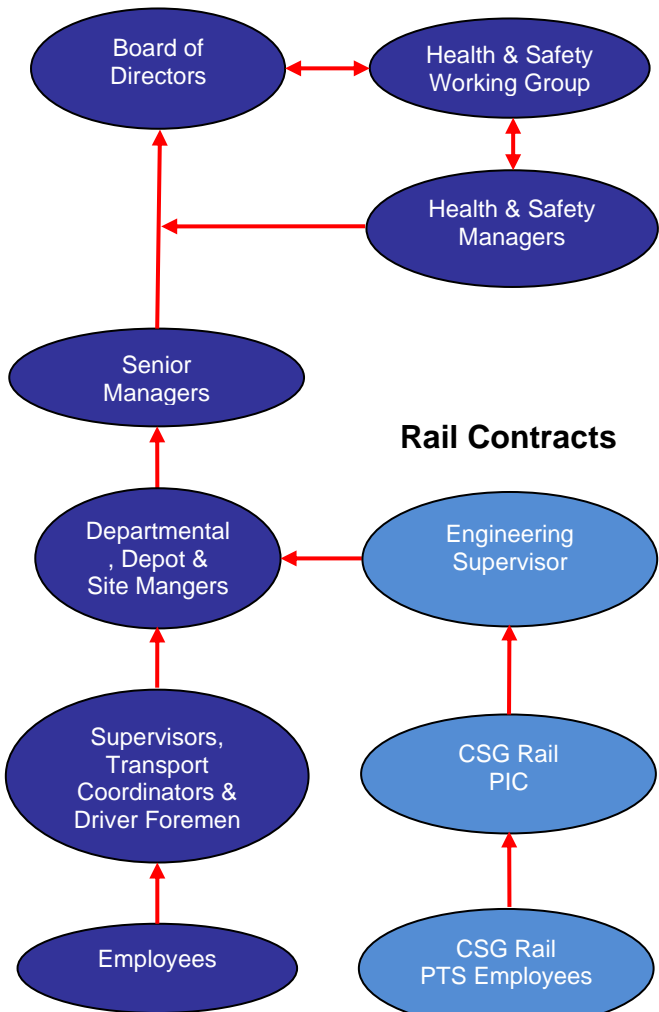


The Group's approach:

- Health and safety are line management responsibilities which are delivered through the Group's line management structure as shown below (left),
- Employee consultation is facilitated through a variety of methods including Monthly Communications and Departmental Communications Meetings as shown below (right),
- Competent health & safety advice, support and leadership is available through the provision of internal Health and Safety Practitioners.

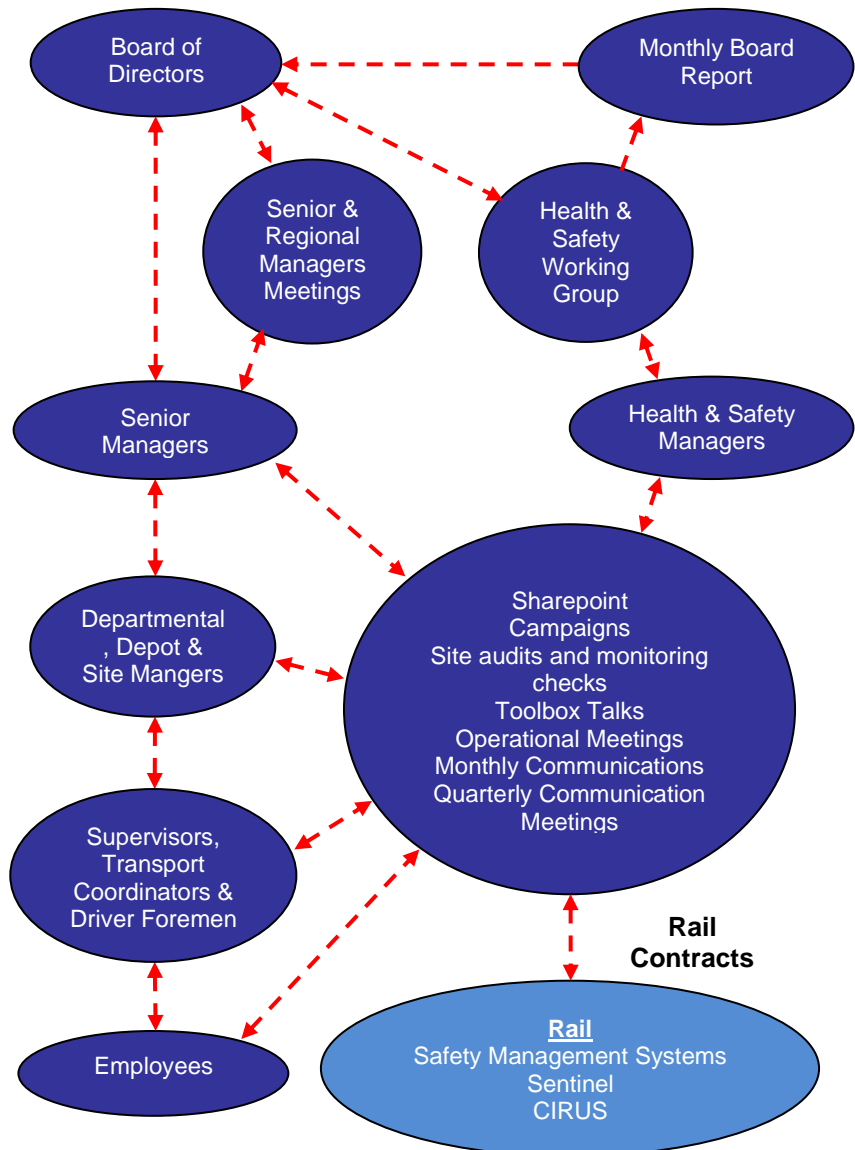
Reporting Line \longleftrightarrow

Roles and Responsibilities



Communication Line \longleftrightarrow

Communication



The Group consists of Cleansing Service Group Ltd. and its Subsidiary Companies

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SECTION 3

Health & Safety Responsibilities



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HEALTH & SAFETY RESPONSIBILITIES CM 4.01 T2

POSITION	RESPONSIBILITY
BOARD OF DIRECTORS	<ul style="list-style-type: none"> • Ensures that the overall arrangements for the Groups operations are executed at all times in such a manner so as to ensure, as far as is reasonably practicable, the health, safety and welfare of all employees and others who may be affected by its operations • Ensures that the company fulfils its legal obligations under the Health and Safety at Work etc Act 1974 and any other relevant Acts of Parliament and Statutory Instruments • Ensures there is an effective company policy for health and safety and that all employees, contractors and temporary workers are made aware of their individual responsibility • Reviews the company's health and safety performance and arranges for the effective planning, organisation, control, monitoring & review of preventative and protective measures for health & safety • Establishes effective downward communication systems and management structures • Facilitates the assessment of risks to employees, customers and any other parties who could be impacted by the company's activities • Participates in health & safety inspections at all operating depots • Ensures that notification and reporting requirements to the relevant statutory authorities are fulfilled • Ensures that responsibilities for health and safety are integrated into the management structure and that managers are adequately trained and capable • Allocates resources for health, safety and welfare as is necessary, including the appointment of competent persons for the management of health & safety within the business • Ensures that health and safety is considered with the same importance as other business functions, particularly when assessing the implications of change • Provides leadership of a positive health & safety culture
HEALTH & SAFETY MANAGERS	<ul style="list-style-type: none"> • Understands the application of and advising on the implementation of the Health and Safety at Work etc. Act 1974 and other legislation relevant to the Company's business • Keeps up to date with changes in current legislation and brings it to the attention of the Board where relevant • Assists with the implementation of the company's health & safety policy • Carries out monitoring, reporting and reviewing of the company's safety performance • Communicates health & safety policy and procedures to managers • Reports health & safety performance to the Board • Assists managers in the identification and management of health & safety risks and application of control measures to ensure safe systems of work are in place • Assists with investigation of significant incidents with line management / employee representatives if directed • Conducts audits of the effectiveness of the management processes and risk controls for health, safety and welfare • Highlights mandatory and other training requirements in health & safety across the company and ensuring that appropriate safety-related training is provided at all levels of the organisation • Participates in operational health and safety meetings as necessary • Be a fully participating member of the Health & Safety Committee fulfilling its roles & responsibilities • Promotes a positive health & safety culture



POSITION	RESPONSIBILITY
<p style="text-align: center;">SENIOR MANAGERS</p>	<ul style="list-style-type: none"> • Understands and implements the requirements of the Health and Safety at Work etc. Act 1974 • Assists with effective implementation of the company's health & safety policy and supports the Board in policy-setting • Assesses the health and safety implications of introducing new working practices or new personnel and monitors ongoing performance • Reviews the performance of their direct reports including health and safety • Ensures the Board are informed of progress and developments in all relevant health & safety matters • Communicates responsibilities to personnel under their authority and ensures that each employee understands that responsibility and is able to carry it out • Ensures that significant incidents are reported as soon as possible to the Board and to the appropriate H&S Manager and that investigations take place to identify root & underlying causes • Ensures that suitable & sufficient risk assessments and procedures are in place to ensure safe systems of work for all activities under their control • Carries out audits of their areas of responsibilities & organising audits to be carried out to assist in the management of health & safety • Ensures that adequate resources, including competent and trained personnel, are made available for health, safety and welfare within their areas of responsibilities • Provides leadership of health & safety activities to promote a positive health & safety culture
<p style="text-align: center;">DEPARTMENTAL DEPOT & SITE MANAGERS</p>	<ul style="list-style-type: none"> • Understands & applies the main requirements of the Health and Safety at Work etc. Act 1974 • Understands & applies Group health & safety policies and procedures • Makes recommendations for improving health & safety performance • Ensures that health & safety policies and procedures are communicated to all employees within their areas of responsibility • Ensures that health and safety issues are discussed in departmental communications meetings • Ensures that suitable & sufficient risk assessments and procedures are in place and being applied to ensure safe systems of work for all activities under their control, including contractors • Ensures that all incidents are reported, recorded and investigated • Carries out audits of their areas of responsibilities and undertaking workplace inspections • Ensures that employees within their areas of responsibility are properly trained and instructed as to their duties and responsibilities • Engages the workforce in the promotion and achievement of a positive health & safety culture



POSITION	RESPONSIBILITY
<p>SUPERVISORS, TRANSPORT COORDINATORS & DRIVER FOREMEN</p>	<ul style="list-style-type: none"> • Acts in accordance with the requirements of the Health & Safety at Work etc. Act 1974 • Understands & follows the Group health & safety policy and procedures • Implements changes to health & safety systems following reviews • Informs employees of their health & safety responsibilities and responds to employees concerns about health & safety • Ensures that risk assessments & work procedures are adhered to resulting in safe systems of work • Ensures that incidents and near-misses are reported and assists in any subsequent investigation as directed • Carries out regular inspections of the workplace and reports findings to management • Ensures that employees are sufficiently instructed, informed & supervised and allocates work in accordance with the employee's level of competence & experience • Sets a good example as part of a positive health & safety culture
<p>EMPLOYEES</p>	<ul style="list-style-type: none"> • Takes care of their own health & safety and that of people who may be affected by what they do in accordance with the requirements of the Health & Safety at Work etc. Act 1974 • Works in accordance with the Groups health & safety policy and procedures • Co-operates with others on health & safety, including not interfering with, or misusing, anything provided for health, safety or welfare • Attends departmental communications meetings and raises health & safety concerns • Carries out assigned tasks and duties in a safe manner and in accordance with measures set out in risk assessments & method statements to ensure a safe system of work at all times • Reports incidents, near-misses and defective equipment • Obtains and uses the correct tools, equipment & personal protective equipment specified for each task, only operating tools & equipment which they are authorised to use in accordance with training & instruction received • Contributes to health & safety reviews and inspections • Participates in a positive health & safety culture

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SECTION 4

Health & Safety Management



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4. Health and Safety Management

4.1. Objectives (CM/4.01)

GENERAL

The Group is committed to continually improving health, safety and welfare standards and performance. To this end it endeavours to ensure that all relevant Statutes, Regulations and Codes of Practice are complied with. The minimum standards that are adopted by the Group are those required by law, although the Group will seek always to exceed these where there is a demonstrable benefit.

The Health and Safety Policy (CM/1.03) clearly states the Group's vision for health and safety. Health and safety objectives and appropriate arrangements/management systems are detailed below:

OBJECTIVES

CSG has 4 Health and Safety Pillars shown below, objectives are set annually by the H&S Working Group focussed around the pillars and the CSG vision. Further information on the objectives can be found within CM 4.45 GN1.

CSG H&S Pillars

Safe Environment

Safe Systems

Safe People

Safe Equipment

The Board will ensure that adequate resources are committed in pursuance of these objectives.

ORGANISATION FOR HEALTH & SAFETY

An Organogram (refer to CM/4.01/D1) illustrates the Group's approach to health and safety showing the interaction within the Group's organisational structure.

RESPONSIBILITIES

Overall responsibility lies with the Managing Director. Day to day implementation is delegated through every level from the Managing Director to Depot/Site/Departmental Managers and individual employees.

Most health and safety procedures apply Group wide, there are a small number of exceptions where procedures are site or department specific. In all cases the owner of the procedure is recorded on each procedure, the owner is responsible for ensuring procedures are consistent with the Groups' Safety Management System.

Depot/Site/Departmental Managers are responsible for ensuring that safe systems of work are in place to control the risks to people who may be affected by the tasks under their control or supervision. Every line manager is responsible for achieving the standards in their area of control.

All employees have legal obligations to take all reasonable care to protect themselves and anyone else affected by their acts or omissions. As such all employees are expected to recognise this duty they have and accept responsibility to do everything they are able to prevent injury to themselves and others and loss to the Group. An overview of health and safety responsibilities is detailed in group Procedure CM/4.01/T2, specific employee responsibilities are detailed within job descriptions



Employees must co-operate with the Group by:

- Familiarising themselves with the risk assessments and safety method statements relevant to the work they are undertaking;
- Working safely and efficiently to approved methods;
- Working with regard to the safety of themselves and others;
- Adhering to the Group's health and safety policy and associated management system documentation;
- Reporting all near-misses, health and safety observations, vehicle collisions and injuries in the correct manner and co-operating in investigations and measures taken to prevent recurrence;

ARRANGEMENTS, POLICIES AND PROCEDURES

The main arrangements and procedures for health and safety are to be found within the Health and Safety section of the Group intranet (Sharepoint). These cover general work-related risks including Risk Management and Risk Assessments, Manual Handling Assessments, COSHH Assessments, Fire Safety, Office Safety and DSE Assessments, Electrical Safety, Plant and Equipment Maintenance, PPE, Accident Reporting and Investigation (including Vehicle-related Incidents and Near Miss Reporting), Safety Inspections, Noise Control and Emergencies (including First Aid, Spillage Control) together with more specialised risks associated with the Group's core business including Confined Space Working, Permits to Work, Tanker Dig-out, Working with Sewage, Daily Vehicle Safety Checks, Lone Working, Working at Height, Control of Contractors, Assessing Sub-Contractors, and vulnerable workers such as Young Persons and Expectant Mothers.

Outside of the health and safety section are procedures to cover other areas of the business which include health and safety aspects including: Internal Communications (CM/2.03); Employee Training & Development (CM/2.08); Preventative Action (CM/2.09); Driving Licence Control (CM/3.22); Working Time Directive (CM/3.24); Approved Supplier (CM/5.02).

A summary of the arrangements are detailed below:

Legal Requirements

The Group maintains a Register of Legal Requirements that identifies the various health & safety regulations, codes of practice, industry guidance etc. that affect the Group's business activities (refer to CM/4.01/R1). This register is cross-referenced to the Group's policies and procedures to further ensure full compliance (refer to CM/4.01/T1).

Safety Management System

The Group's Safety Management System is documented and structured and follows HSE guidelines. The system follows a three-tier approach with top level policies and procedures supported by safe systems of work, risk assessments, work instructions, method statements etc. Policies and procedures are posted on the Group's intranet – SharePoint – and safe systems of work are held either on SharePoint or if they are local at Group locations. A system of document control, review and revision is used to ensure that all documentation is kept up-to-date.

Risk Assessments

Risk assessments are carried out for all activities in accordance with the Management of Health and Safety at Work Regulations 1999. These assessments are carried out by trained and competent persons including Departmental Managers and Site Managers. Risk assessments may be activity based or site specific depending upon the particular activity or customer requirement. All risk assessments are made available to employees, copies are



stored on the Group's intranet (SharePoint). In addition last-minute risk assessments are carried out continuously by employees throughout their work.

Hazards are identified and the risks evaluated in severity before, and again after, the application of control measures. If the risk is still high, the job will not take place until additional control measures have reduced the risk to an acceptable level. Work methods are established to minimise the risk of harm to employees and others affected by the work. For higher risk activities, e.g. confined space working, additional assessments are applied such as permits to work prior to commencement of any work.

The nature of waste collection, handling and the location of work is extremely variable and is often carried out on premises not controlled by the Group. As such the Group requires its employees to carry out dynamic or "last minute" risk assessments prior to commencing work and to report to their manager any significant hazards not identified in, or different to, the task risk assessment.

Risk assessments are reviewed and updated periodically or when changes occur in the work activity or working environment. (Refer to Procedure CM/4.05 Hazard & Risk Management).

Public Safety

The health and safety of members of the public (and other third parties e.g. contractors, visitors), that may be affected by the Group work activities, is considered paramount at all times. Risk assessments include significant impacts on third parties and control measures are implemented to eliminate or reduce the risk to an acceptable level. Any work area that could place others at risk due to the Group's activities are isolated by appropriate means (e.g. safety signage, barriers, cones, tape, hoarding) in order to restrict access.

Visitors to Group sites/premises are made aware of safety rules and procedures that affect their safety and are restricted from entering hazardous areas.

Training

All employees are given training appropriate to their responsibilities in accordance with the Management of Health and Safety at Work Regulations 1999. Training will be provided for the following situations:

- Induction training for new employees (Health and safety awareness, Group Policies & Procedures, Safe Systems of Work etc.);
- The introduction or modification of new/existing machinery or technology;
- A change in employee position/work activity or responsibility.

Training is also specifically provided for other health and safety considerations including work with hazardous substances, use of PPE and manual handling. Training provided to Group staff is formally recorded.

A programme of refresher training will be undertaken to keep employees up to date with legislation and industry best practice. (Refer to Policy CM/1.06 Corporate Training Policy and Procedures CM/2.07 Induction Training & CM/2.08 Employee Training & Development).

Communication and Consultation

In order to meet the legal requirements of the Health and Safety (Consultation with Employees) Regulations, the Group communicates and consults with all employees on the following issues:

- The content of this policy;
- Relevant rules specific to a site or job;
- Changes in legislation or working best practice;



- The planning of Health and Safety training;
- The introduction or alteration of new work equipment or technology.

This communication and consultation takes place directly with the employees via a number of different methods including regular departmental communications meetings, tool-box talks, memos posted on the site notice boards, via the employee representatives etc. (Refer to Procedure CM/2.03 Internal Communications).

Workplace Health and Safety

All Group premises and work sites are required to meet certain standards. Workplace inspections are carried out by Group management to monitor health and safety conditions and performance. In addition an annual audit schedule for Group sites is implemented by the Compliance Review Committee and an action plan determined to rectify any deficiencies, monitoring checks are also carried out on Group employees working at customer's premises/sites.

There are systems in place to report workplace hazards, safety concerns and defective plant/equipment.

Occupational Health (including mental health)

The Group is committed to improving the health and well-being of all employees. The Group recognises that occupational ill-health is preventable by taking effective steps to control health risks at work (refer to Policy CM/1.30 Occupational Health Policy). The Group promotes employee well-being through sharing information, providing training, signposting, access to 24/7 counselling and GP support, wellbeing assessment tools and other resources located on SharePoint or via the employee assistance programme.

Occupational Stress

Stress is not in itself an illness but can result in psychological illness and may contribute to physical illness. It can be considered as the adverse reaction people have to excessive pressure or other types of demand placed upon them. The Group recognises that workplace stress is a health and safety issue and acknowledges the importance of identifying and reducing workplace stressors.

Preventative Inoculations

The Group requires and actively encourages all operational employees, on commencement of employment, to consult with their own GP on the recommended preferred prophylactic injections for waste industry workers.

Alcohol and Drugs Policies

The Group does not tolerate any employee (or contractor engaged by the Group) being at work under the influence of alcohol, drug (illegal or medicinal) or other substance which renders them unfit for work. Furthermore the Group does not tolerate possession, consumption, handling or selling of alcohol or drugs on Group or customer premises (refer to Policy CM/1.10 Alcohol Policy and CM/1.22 Drugs Policy).

Any such conduct committed by Group employees is deemed unacceptable and will be treated as gross misconduct according to Group disciplinary procedures.

The Group does however consider alcohol or drug misuse as a health issue rather than a case for instant dismissal and encourages any employees with a alcohol or drug-related problem to seek help voluntarily.

Personal Hygiene

The Group requires all employees to maintain a good standard of personal hygiene at all times. Where required, the Group provides work wear and laundry facilities to ensure



employees have clean clothing. Furthermore the majority of the Group's vehicles are fitted with hand-washing facilities and employees are provided with wipes, soap etc to facilitate regular washing during working hours.

In addition, where required shower facilities are provided at Group locations for employees to use at the end of their shift.

Smoking and Vaping at Work

The Group has prohibited smoking and vaping in all Group (and customer) premises and vehicles (owned or leased), where possible Group sites will provide designated areas outside identified with signage

Smoking and vaping is not permitted within employee vehicles used on Group business (refer to Policy CM/1.09 Smoking and Vaping at Work Policy).

Absence from Work

The Group is committed to improving the health, well-being and attendance of all employees. The Group will support and help employees who have genuine grounds for absence whatever reason. This support includes alternative work if the employee is unable to carry out their normal duties and compassionate and other leave for necessary absences not caused by sickness (refer to Policy CM/1.25 Absence Policy and Procedure CM/3.16 Sick Leave and CM/3.17 Short & Long Term Absence).

Method Statements

Formal method statements (safe working procedures) will be prepared in writing where the risk is particularly high. The method statements will provide site specific information on the task to be undertaken including site set up, areas of responsibility and will detail a clear sequence of work that would be followed in order to undertake the given task safely and environmentally compliant.

Co-operation with Customers

Employees will always familiarise themselves with customer site rules & regulations and/or procedures when first attending site, in particular general site access, emergency procedures and high risk work activities including permit to work systems. Customers' site procedures and specific instructions will be followed at all times.

If required the employee (or Team Leader/Supervisor) will attend any site meetings or inform other contractors working in the direct vicinity of the activity being carried out of the specific risks and requirements of the work being undertaken.

Sub-Contractors

It is the Group's policy not to sub-contract work unless absolutely necessary. Where used, sub-contractors are engaged on the basis of their technical capability, and health and safety and environmental performance. The Group may choose to not work with sub-contractors who pose an increased risk of health and safety non-compliance. A formal assessment process is in place, approved sub-contractors are retained on an approved sub-contractor register.

Permits-to-Work

The Group operates a permit-to-work system within its locations wherever there is a special need to co-ordinate potentially hazardous situations. The location manager will carry out a risk assessment of the work activity/process and consider whether the hazards and risks identified would be further reduced by a permit-to-work. The Group considers that a permit-to-work system is an extension of a safe system of work but not a replacement for one (refer to Procedure CM/4.09 Permits to Work).



Confined Space Working

The Group's policy on confined spaces is that no person shall enter a confined space unless specified parameters are met (refer to Procedure CM/4.06 Confined Space Working). Confined space working is a specified activity requiring its own safe system of work.

The Group has identified certain operations that require employees to enter and work in a confined space. Moreover, as part of its business activities, the Group offers a service for work requiring confined space entry e.g. tank and interceptor cleaning and inspection. As such the Group has fully trained personnel and specialist equipment available for all aspects of confined space working.

Personal Protective Equipment (PPE)

Appropriate PPE is issued to employees as and when necessary for work activities as required by the Personal Protective Equipment at Work Regulations 1992. A written record detailing what PPE has been issued is retained and Group managers are responsible for maintaining PPE records.

Training is provided for employees on the safe use, storage and maintenance of the relevant equipment before issue.

Employees have a legal duty to wear PPE as specified in relevant site rules, risk assessments and method statements. (Refer to Procedure CM/4.13 Personal Protective Equipment).

Hazardous Substances

The Group carries out assessments of any substances used, in accordance with the Control of Substances Hazardous to Health (CoSHH) Regulations 2004 (as amended), the information being recorded and held on file.

Assessments consider engineering controls, storage, handling, and aspects of use, exposure, workers health, and emergency actions. Departmental Managers will brief employees on any hazard or substance precautions, with written records being located in an accessible location within each department.

An inventory of all substances and materials hazardous to health is held locally at each Group site. (Refer to Procedure CM/4.08 CoSHH).

Work Equipment

All work equipment (including electrical equipment) used at work, as part of the Group's undertaking complies with the Provision and Use of Work Equipment Regulations (PUWER) 1998. Furthermore all work equipment requiring statutory inspection complies with the relevant legislation (refer to Policy CM/1.12 Policy on Statutory Inspections, CM/4.20 Work Equipment Safety and see specific sections below).

Employees are trained on the safe use of equipment which includes not knowingly misusing work equipment or removing safety critical features such as guards.

All work equipment is maintained and inspected at suitable intervals either internally by a competent person or by specialist external companies. The frequency of work equipment maintenance or inspection is based on manufacturers' guidance and industry best practice. Any maintenance / inspections undertaken on Group equipment are formally recorded.

Checklists are in place for the routine inspection of tools and equipment and also for first-use drivers' vehicle checks.



A formal defect reporting system is in place for reporting any faults or damage found on any equipment.

Group site managers are responsible for ensuring the maintenance of work equipment is undertaken and for actioning any recommendations identified within maintenance reports. Health and safety internal audits monitor adherence to the requirements for maintenance and for actioning recommendations.

Lifting Operations and Lifting Equipment

All lifting equipment (including safety harnesses, tripods, winches etc) used at work, as part of the Group's undertaking complies with the Lifting Operations and Lifting Equipment Regulations (LOLER) 1998.

Departmental managers are responsible for ensuring all such work equipment is thoroughly examined in accordance with the legislative requirements and for actioning any maintenance and isolation identified within examination reports. Health and safety internal audits monitor adherence to the requirements for thorough examination and for actioning recommendations. (Refer to Procedure CM/4.32 Lifting Operations (LOLER)).

Pressure Systems

All pressure systems to which the Pressure Systems Safety Regulations 2000 (PSSR 2000) apply are inspected according to the written scheme.

Departmental Managers are responsible for ensuring all such work equipment is inspected / tested according to the legislative requirements and for actioning any maintenance and isolation identified within examination reports. Health and safety internal audits monitor adherence to the requirements for inspection of pressure systems and for actioning recommendations. (Refer to Procedure CM/4.33 Pressure Systems).

Electrical Equipment

All electrical equipment (both fixed installations and portable equipment) is inspected and tested according to the requirements of the Electricity at Work Regulations (EAW) 1989 and associated HSE guidance.

Departmental Managers are responsible for ensuring all such work equipment is inspected / tested at the appropriate interval (Refer to Procedure CM/4.31 Electrical Safety).

Road Safety, Vehicle Management and Workplace Transport

A large part of the Group's business activities relies on road transport and as such the Group has established a policy for road safety (Refer to Policy CM/1.23 Road Safety Policy). As transport plays a key role in the Group's business activities and the Group recognises the hazards from moving vehicles and mobile plant. Workplace transport risk assessments have been carried out on all Group sites and actions taken to control any risks.

It is Group policy that all vehicles and trailers shall be kept in a roadworthy condition, meet all legal requirements and all equipment shall be fit for its purpose. The Group ensures that all its vehicles are regularly inspected, serviced and maintained according to DVSA guidelines not only to ensure compliance with Operator's Licence requirements but also to protect the health and safety of drivers, operators and other road users, deliver environmental targets and ensure the quality assurance standards necessary to meet our customers' needs. (Refer to Policy CM/1.21 Vehicle Inspection & Testing Policy and Procedure CM/4.22 LGV Driver Vehicle First-use Checks plus associated transport procedures).



The Group also requires all road traffic collisions and vehicle-related incidents including property damage involving Group vehicles to be reported (Refer to Procedure CM/4.02 Accident and Incident Reporting and Investigation Procedure).

Accident and Incident Reporting

All accidents and incidents on CSG premises or relating to CSG work are to be reported to a manager and the details recorded on the appropriate CM4.02 form. Managers are responsible for ensuring a copy of the form is emailed to healthandsafety@csg.co.uk for receipt by both the HR and H&S departments and for retaining a copy of the form locally.

The Departmental Manager will carry out any initial investigation and forward a copy of the investigation report to the Health and Safety or Group Compliance Manager. All time-losing injuries and serious accidents will be investigated by the Health and Safety or Group Compliance Manager.

Certain accidents defined under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) 2013 must be reported to the HSE, this report will be made by the Health & Safety or Group Compliance Manager.

All such reportable accidents / incidents will be investigated by the Health & Safety Manager and reported to the Board of Directors. (Refer to Procedure CM/4.02 Accident & Incident Reporting).

Safety Concerns and Near Miss Reporting

The Group is committed to improving safety performance and as such encourages all employees to report all safety concerns and near misses. The Group believes that if safety concerns are raised and near misses are routinely reported and action is taken to follow them up, it will help improve safety for everyone. The Group has established a safety concern/near miss reporting system which is designed not to lay blame but to help prevent a similar or worse occurrence from happening again. (Refer to Procedure CM/4.02 Accident and Incident Report and Investigation).

First Aid

Adequate first aid provision is made at every place of work occupied by the Group according to the Health and Safety (First-Aid) Regulations 1981. A first aid needs assessment has been carried out at each Group location to determine the number of first aiders and type of first aid equipment required. The location of first aiders and first aid equipment is displayed at each location.

In addition all drivers are supplied with a travel first aid kit and training carried out where appropriate. (Refer to Procedure CM/4.10 First Aid).

Manual Handling

An assessment of the manual handling risks of all work activities is carried out as required by the Manual Handling Operations Regulations 1992 (as amended 2002). The method of work is adapted to minimise manual handling risks wherever possible, including use of alternative lifting and carrying methods. Group employees are advised not to manually handle loads which they feel incapable of moving safely and to report such situations to their line manager so that alternative arrangements can be made. (Refer to Procedure CM/4.16 Manual Handling).

Working at Height

The Group follows the working at height hierarchy detailed in the Work at Height Regulations 2005 (as amended). The generic risk assessments carried out for all activities consider working at height including working at ground level over interceptors, manholes etc. and the necessary control measures are put in place where required. Where working at height is



absolutely necessary then specific risk assessments will be carried out and a safe operating procedure written for the task prior to commencement of any work (Refer to Procedure CM/4.29 Working at Height).

Noise at Work

The Group recognises its duty under the Control of Noise at Work Regulations 2005 to ensure that the risk to employees' hearing is reduced to the lowest level that is reasonably practicable to achieve (refer to Procedure CM/4.19 Noise Control).

To this end noise assessments have been carried out at all Group locations and during work activities. Ear protection zones have been established and hearing protection provided or made available where required.

Consideration is given to the hazards posed by ototoxic substances, further information is detailed within the CM/4.19 Noise Control procedure.

Fire Safety & Emergency Procedures

The Group recognises fire as a significant business risk and takes its responsibility for fire safety extremely seriously. The Regulatory Reform (Fire Safety) Order 2005 requires a 'Responsible Person' to be appointed, Cleansing Service Group Limited is designated as the 'Responsible Person' and has in turn designated 'duty holders' at each site, unless otherwise identified, the duty holder is the site manager or the person in charge of the building maintenance at each site. Duty holders are responsible for assisting Cleansing Services Group Limited in the management of fire safety arrangements locally (Refer to Policy CM/1.27 Fire Safety Policy Statement).

Site managers are responsible for ensuring a fire risk assessment is undertaken at each Group location and appropriate arrangements are put in place to manage those risks.

Each Group location has an Emergency Plan which takes into account all feasible incidents and emergencies which could occur on and around the site. These possible incidents and emergencies are listed within the Emergency Plan and procedures developed to deal with any of them should they arise. The Emergency Plan includes methods of minimising harm to humans, harm to the environment and harm to property.

Duty holders are responsible for keeping areas under their control safe from fire, ensuring that all fire prevention systems and firefighting equipment are inspected and tested according to the regulations and ensuring that their employees are trained in proper fire prevention practices and emergency procedures.

All employees have a duty to conduct their operations in such a way as to minimise the risk of fire. This involves compliance with the Group's no smoking policy, keeping combustible materials separate from sources of ignition and avoiding unnecessary accumulation of combustible materials. (Refer to Procedure CM/4.18 Fire Safety).

Health and safety internal audits monitor adherence to the requirements for fire safety.

Lone Working

Many of the Group's routine work activities involve single person operation and as such lone working may be involved. Arrangements have been put in place e.g. provision of a mobile phone and instructions to employees to contact the Depot at regular intervals; vehicles fitted with tracker devices for Depot Management to check on vehicle locations and time spent on site. More hazardous activities are usually carried out by at least two persons including a team leader.



Carriage of Dangerous Goods

The Group is required to carry dangerous goods as part of its core business activities. The Group operates to the legislative requirements (currently ADR 2025 and the Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations 2009 (as amended). The Group has trained relevant drivers and appointed Dangerous Goods Safety Advisers (DGSA) in accordance with the regulations (refer to Procedure CM/4.24 Dangerous Goods).

Ergonomics and Office Working

The Group recognises that the *Health and Safety (Display Screen Equipment) Regulations 1992 (DSE)* apply only to 'workstations', 'users' and 'operators' as defined in the regulations. For the majority of Group employees, although display screen equipment is being used, the regulations do not apply.

Where the regulations do apply, Departmental Managers are responsible for ensuring that a suitable and sufficient risk assessment is carried out in relation to each workstation under their control. The user will carry out a self-assessment of their workstation which will be reviewed by a competent person and any issues and subsequent corrective actions will be discussed with the Departmental Manager (refer to Procedure CM/4.17 Display Screen Equipment).

Asbestos – Duty to Manage

In compliance with the Control of Asbestos Regulations 2012 and the Duty to Manage Asbestos Containing Materials (ACM), the Group seeks to minimise the risks to health where asbestos is or may be present in any Group property.

The Group surveyed each of its premises to identify asbestos and asbestos containing materials.

The Group has implemented Asbestos Management Plans at sites where asbestos may be present to manage the risk of anyone being exposed to these materials and has made all employees aware of the plan. Training is provided to site managers on asbestos awareness, the Health and Safety department is notified in the event of any incident or potential exposure relating to asbestos release.

The Group is not a licensed asbestos contractor but does respond to incidents involving fly-tipped asbestos and also transport and dispose of asbestos waste at its permitted landfill facility. Risk assessments and method statements have been implemented and communicated to all relevant personnel involved in this process and training has been provided on the hazards of asbestos and asbestos containing materials (refer to Policy CM/1.17 Asbestos Management).

MEASURING AND REVIEWING SAFETY PERFORMANCE

Health Surveillance

The Group has appointed external occupational health professionals to monitor the health of all employees who might be exposed to hazardous substances, noise or occupational disease as identified by risk assessment.

Accident, Incident and Near Miss Reporting

Information is provided above.



Health and Safety Auditing

An internal health and safety auditing programme is developed by the Compliance Review Committee which ensures every Group location is audited regularly by one of the CSG internal auditors..

The Group has developed an audit process to verify that the health and safety management system is operated correctly at all levels within the Group. The audit examines physical conditions and systems against established standards. The audit ensures corrective actions and preventative measures are identified and implemented within agreed timescales.

Management Review

The Compliance Review Committee formally reviews, on an annual basis, the Safety Management System and the Health & Safety Policy to ensure their effectiveness and compliance with current legislation. This review is submitted to the Board of Directors.

Amendments may however be introduced at any time as part of the Group's policy of continuous improvement.

The Group consists of Cleansing Service Group Ltd. and its Subsidiary Companies

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SECTION: Health and Safety

OWNER: HEALTH AND SAFETY MANAGER

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