

WRIGHTS OF TWYCROSS LTD

Health and Safety Policy



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Health and Safety Policy Statement

This is the Health and Safety Policy Statement of:

Wrights of Twycross Ltd

Wrights of Twycross Ltd (the 'Organisation') remains aware of its responsibilities relating to Health & Safety matters throughout its business activities.

By carrying out management reviews and staff training the Organisation ensures that its performance relating to Health & Safety matters continually improves.


The management recognises and accepts its responsibility to ensure, so far as is reasonably practicable, the health and safety of all its employees, contractors, visitors and those members of the public who may be affected by the business' activities.

The Organisation complies with all OH&S legislation and regulations and internal business requirements applicable to its activities, in relation to the provision of recycling, bulk haulage, waste management and environmental services, plant hire, and Jetting Services.

This will be achieved by:

- Providing adequate control of safety risks arising from the work activities;
- Consulting with employees on matters affecting health and safety;
- Providing and maintaining safe equipment;
- Ensuring safe handling and use of substances;
- Providing information, instruction and supervision for employees;
- Ensuring all employees are competent to do their tasks;
- Preventing accidents and cases of work-related ill health;
- Maintaining safe and healthy working conditions; and
- Reviewing and revising this policy as necessary at regular intervals.

The company will endeavour to eliminate any hazards which may result in personal injury, illness, fire, security losses, property damage or harm to the environment.

Date of Issue 25/04/2023	Signed: 
Review Date : 31 st March 2024	Print name: Kevin Owen.

Responsibilities

This section of the policy explains the responsibilities for such areas that require controls to reduce risks to meet the aims of the Health and Safety policy statement of **Wrights of Twycross Ltd**.

Overall and final responsibility for Health and Safety within the business of **Wrights of Twycross Ltd** is that of the Chairman, **Peter Wright**, Board of Directors, **Robert Wright, David Wright, Kevin Owen, George Brain** and Company Secretary **Louise Whitehead**. These are supported by the Group Head of Safety, **Tam Bream** and Health and Safety Advisor, **Andy Boulstridge**.

To ensure that health, safety and welfare standards are maintained and improvements undertaken, the following people are responsible for ensuring that all activities under their control are carried out in accordance with the Health and Safety policy, the standards and safe working procedures of **Wrights of Twycross Ltd** and any statutory provision that will apply to their area of responsibility.

Name	Title	Area of Responsibility
Robert Wright	Director	Managing Director for P.A Wright and Sons Ltd, Parent Company of Wrights of Twycross Ltd
Kevin Owen	Director	Responsible for Corporate Governance, operational activities and Health & Safety for Wrights of Twycross Ltd . Assist Board of Directors in the financial responsibilities for the business
David Wright	Director	Responsible for vehicle compliance.
George Brain	Director	Overall Responsibility for Project Management and deliver of solutions and resources to complete special tasks for customers.
Louise Whitehead	Director	Health and Safety, Company Insurance
Tam Bream	Group Head of Safety	On behalf of the Board, responsible for the management and ongoing improvements of the Company Policies and Procedures and ensuring these are implemented adequately.
Andrew Boulstridge	Health & Safety Advisor	Developing and maintaining health and safety systems. Correlate proactive and reactive information to report to contracts. Implement health and safety policies through inspections and audits. Liaise with customers.
Josh Wright	Contracts manager	Management of STW biosolid recycling and tankering.
Freddie Wright	Contracts manager	Contract Management Anglian Biosolids and tankering services. Alpheus, Thames Water and Severn Trent Service operations.
Heather Boulstridge	HR & Personnel Manager	Office areas and administrative staff

Arrangements

Employees

Employees have legal duties under the Health and Safety at Work Act 1974.

In particular they must:

- Take reasonable care of themselves and others who may be affected by their acts and/or omissions at work
- Cooperate with the employer on any health and safety matters
- Cooperate so far as necessary, to enable duties or requirements imposed on Wrights of Twycross Ltd by any relevant statutory provision to be complied with (follow all instructions and procedures as laid down by the company in order to comply with the law and company safety procedures)
- Do not intentionally or recklessly tamper with or interfere with any item put in place for safety, welfare or health in pursuance of relevant statutory provision

Failure to comply with these requirements may lead to disciplinary action being taken by the company. There is also the possibility of prosecution for breaches of health and safety laws.

Consultation with the Workforce

In order to maintain a successful health and safety management system, involvement across the entire company will be required. Under the Health and Safety (Consultation with Employees) Regulations 1996, Wrights of Twycross Ltd will consult with all employees either directly or through selected/elected employees.

A management safety team has been created and includes directors, line managers and the health and safety department. The team meets regularly to discuss plans for forward progression and improvement of health and safety and efficiency of operations. Accident and near miss figures along with any updates on relevant legislation and good practice are also discussed at the meeting.

Minutes are taken during the meeting and an action plan is formed to enable changes to be implemented.

WOTSIT (Wrights of Twycross Safety Improvement Team) is a safety team developed for the front-line staff. It offers an opportunity to highlight any concerns regarding the operations undertaken. The outputs of these meetings are then discussed in the management meetings to try and improve the working environment for all staff.

Risk Assessment

Under the Management of Health and Safety at Work Regulations 1999, Wrights of Twycross Ltd has a duty to assess risks to the health and safety of anyone who may be affected by its business operations. The company's Health and Safety Policy states that it will do all that is reasonably practicable to ensure that no one is put at risk from any activities that are under its control.

Business risk assessments will be undertaken by the health and safety department and or competent persons in consultation with NFU Mutual Risk Management Services Ltd. The findings of all risk assessments will be made available to all members of the workforce.

The Competent Person for each department shall decide on the best process to control risks with the aid of technical information provided by the Health and Safety team, industry best practice, manufacturers guidance and technical scientific information provided by industry related bodies as far as is reasonably practicable.

The health and safety department and line managers will be responsible for ensuring the actions required are implemented and through safety audits and inspections will check that these actions have removed the hazards or reduced the risks so far as is reasonably practicable. Further reviews will be undertaken when the work or the equipment used is changed.

Assessments will be reviewed at appropriate intervals, when work activity/methods change or an incident leads to the review of the assessment. Whichever is soonest.

Dynamic Risk Assessment

Dynamic assessments follow on from risk assessments that have been written for a work activity, where factors change but still need to be controlled. These assessments encompass any changes that have occurred since the initial assessment has been conducted.

Dynamic assessments must be completed by a trained operative before commencing a task. Operatives should attempt to control any residual risk, however if there are concerns, advice must be sought from the respective line manager or the health and safety department.

Safe Systems of Work

Where activities carry particular risks, a safe system of work or method statement will be written and implemented.

A safe system of work or method statement is a set of procedures/rules that considers the safe method of undertaking a particular activity. As these are safety procedures they must be complied with. Failure to comply can lead to injury, illness, disciplinary action or in some cases prosecution in a court of law (HSWA 1974 (Section 7)) for not following company instruction.

Where a better method is discovered, the relevant line manager must be informed, who in turn will report to the health and safety department. A decision will then be made and staff will be informed of that decision as soon as is reasonably possible. Safety instructions must continue to be followed until method statements are amended if that is at all possible.

Each individual will be trained to the specific method statement/safe system of work to allow them to operate to the recommended safe practices regarding the activity. Where any changes are made to the method statement, an update will be placed into all safety packs. A toolbox talk will be used to communicate these changes.

Control of Visitors

- All visitors must park in the visitor parking area and report to reception
- All visitors must sign in in the visitors' book
- Visitors should wait in the reception area until they are met by a member of staff
- A member of staff must escort visitors at all times whilst on site and then take them back to the reception area where they can sign out and leave the premises
- In the case of an emergency, all visitors must be escorted out of the buildings and remain with a member of staff

Control of Contractors

- Prior to any work being carried out by contractors on sites owned/managed by Wrights of Twycross Ltd, contractors will complete a contractor questionnaire and relevant documentation will be provided prior to commencement of work. These documents will be reviewed by the health and safety department.
- The health and safety department / Assigned representative will conduct a site induction with the contractors where necessary
- Contractors will comply with relevant legislation such as the Health and Safety at Work Act 1974, Management of Health and Safety in the Workplace Regulations 1999 and Construction (Design and Management) Regulations 2015. This is not an exhaustive list.
- Contractors will familiarise themselves with the working location and hazards that may be present.
- Contractors will take precautions to prevent harm to their own employees and any others who may be affected by their actions/activities
- Contractors will keep their employees within the designated work areas and access/egress
- Contractors will engage on any contract, only persons that are skilled, experienced and competent in the performance of their trade
- Contractors will use only plant and equipment which conforms to Provision and Use of work Equipment Regulations 1998
- Contractors will provide their own personnel with suitable PPE, at their expense
- Contractors will notify Wrights of Twycross Ltd of any hazards and risks introduced
- Contractors will comply in principle with the health and safety policy of Wrights of Twycross Ltd

Information, Instruction, Training and Supervision

The Health and Safety (Information for Employees) Regulations 1989 requires Wrights of Twycross Ltd to display a poster telling employees what they need to know about health and safety provision.

A copy of the HSE's Health and Safety Law poster is situated in the following locations:

- Gopsall House Farm: Driver information area and workshop mess room
- Copston Lodge Farm: Drivers wash room / tea room
- Beanfield Farm – Workshop
- Harris Bridge – Project office information area

Health and safety advice is available from the following:

- Health and safety department of P.A Wright and Sons Ltd
- The HSE website – www.hse.gov.uk
- NFU Mutual Risk Management Services Limited

The law requires that Wrights of Twycross Ltd provide appropriate information, instruction and training regarding health and safety at work. This is to ensure the safety of staff and others who may be affected by their actions and work activities.

On commencing employment with the company, new employees will be taken through the induction process. This will be undertaken by the assigned person for the department within which they are working, the Health and Safety department for policies and procedures and HR in relation to contracts of employment.

Job specific training will be provided by an assigned trainer to the expected standard to create a competent workforce. Where young persons/trainees are concerned, supervision will be arranged, undertaken and monitored by a senior manager / line manager.

Specific tasks must only be carried out by authorised members of the workforce who have successfully completed the required training courses.

Examples of activities that require specialise training include:

- Operating machinery/plant such as forklifts, wheeled loaders, 360 excavators, telehandlers, ATVs etc
- Entry into confined spaces
- Chemical usage and handling
- Chainsaw work
- HGV driving
- Electrical installation/commissioning
- Working at height

*This list is not exhaustive

Members of the workforce who will operate vehicles used by the business, will hold the appropriate licence to undertake such work with that vehicle. Driving licenses will be checked by the driver compliance team a minimum of 3 monthly with www.gov.com and license bureau

Training records and relative information regarding competency will be held and updated regularly by the Copston Office / health and safety department. All training will be identified and monitored by the line managers and the health and safety department.

If a member of the workforce does not understand any issues that relate to their own health and safety whilst at work or consider the information or training they have received inadequate, they must report this to the health and safety department.

Induction

On commencement of employment, a new employee will go through the induction process. This induction will provide them with information on company standards and procedures, health and safety requirements and information regarding job training and how it will be undertaken.

The induction process shall consist of:

The Health and Safety induction will cover key topics such as accident reporting, hygiene, working with hazardous substances. safe systems of work and risk assessment procedures. Various methods of communication are used throughout the induction. Any previous training that has been undertaken prior to employment is identified and added to training records. Manual handling training is completed during the induction.

Human resources and the Health and Safety Team undertake the second stage of the induction. This section involves the discussion of company procedures and policies. A health questionnaire is also completed to ascertain any health conditions that may impact the job role if this has not been done prior. This information is held in an individual's confidential personnel file.

The final stage of the induction involves the individual undertaking a training programme tailored to the specific job type. This training period will last for as long as necessary and will include theory and performance-based assessments to ensure competency of the new employee. This will be carried out by a competent person. Towards the end of this period, the manager will make an assessment as to the competence of the individual and if deemed at a high enough standard, will then be integrated into the team.

Licence Checks

To be able to drive any vehicle owned by Wrights of Twycross Ltd, information for these checks must be provided.

During the induction, a new starter will provide up to date licences (CPC, driving licences, plant where necessary). Copies are taken for records by human resources. A consent form will be completed to allow for licence check to be carried out by an external company. A completed consent form is valid for 3 years.

The external company will notify Wrights of Twycross Ltd of any changes on each 6 month check (Checks are carried out a minimum of 3 monthly for HGV drivers). Appropriate action will be taken on receipt of this information.

HGV Competence

- Licence checks are a condition of employment and are undertaken every 3 months
- An assessment is conducted either using a third party driving assessor to determine driver ability and areas for improvement or by a competent colleague as directed by the management
- Assessment recommendations are to be followed up with driver training

Emergency Procedures – Fire and Evacuation

In order to comply with the Regulatory Reform (Fire Safety) Order 2005, the company has a duty to ensure the safety of the staff during an emergency. To achieve this, responsible persons have been appointed to manage emergency situations.

The health and safety department will undertake fire risk assessments and along with the directors and line managers, ensure that any actions highlighted are implemented.

A fire log will be maintained to ensure that floor plans are up to date and testing is completed for emergency equipment, fire extinguishers and alarm systems.

A fire drill will be conducted every 12 months and will be managed by the trained fire marshals. Response times will be recorded and a debrief held with all the marshals afterwards to discuss any problems and how to overcome them.

Fire suppression equipment / Fire extinguishers will be checked 6 monthly and twelve monthly to ensure they are in a usable condition.

Training will be provided to relevant staff in the use of fire extinguishers where appropriate, however if there is any doubt at all, leave the building by the nearest fire exit and call 999.

Accidents, First Aid and Work Related Health

Wrights of Twycross Ltd will ensure, so far as is reasonably practicable, that all accidents and dangerous occurrences will be reported internally. Notifiable accidents, diseases and dangerous occurrences will be reported to the enforcement authority of which applies. See Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR 2013).

In addition to this, all accidents and dangerous occurrences will be investigated and reasonable measures shall be put in place to prevent reoccurrence.

- All accidents, dangerous occurrences and cases of confirmed work-related ill health* are to be reported to the line managers without delay. The details will be recorded on the appropriate report forms kept in the main office at Gopsall House Farm
- It is important that all accidents and near misses are recorded on the relevant form and passed to the health and safety department from all areas of the business
- The health and safety department and line managers will be responsible for undertaking investigations following accidents, near misses, dangerous occurrences and confirmed work related ill health*.
- The health and safety department and line managers will be responsible for acting upon trend analysis and investigation findings to prevent reoccurrences.
- The health and safety department will be responsible for reporting accidents, diseases and dangerous occurrences to the enforcing authority (RIDDOR 2013)
- The Contract manager and / or health and safety department will be responsible for reporting any incident that relates to a specific contract to the customers concerned.

*Confirmed cases of work related illness in writing or by telephone from a medical professional

The first aid kits are located in the following places:

Gopsall House Farm	Copston Lodge Farm	Beanfield Farm	Harris Bridge
Workshop Mess Room	Farm Office	Welfare building	Workshop
Health and Safety Office	Washroom		
Kitchen	Workshop		
Drivers' area - key safe			

The first aid kits will be checked at regular intervals and recorded by the appointed persons. Items that are no longer sterile or in date shall be removed and replaced with approved first aid materials.

Vehicles used by Wrights of Twycross Ltd will contain first aid kits and these will be checked at regular intervals by the person in charge of the work equipment. First aid kits will be stored in the agreed location in each vehicle.

The appointed first aid persons are highlighted on the noticeboard in displayed in the following areas:

Gopsall House Farm	Copston Lodge Farm	Harris Bridge
Workshop Mess Room	Farm Office	Information area
Drivers Information Area	Workshop	Projects Office.
Kitchen	Washroom Area	

Slips and Trips on a Level

Slips can be caused by:

- Inadequate footwear for the work conditions and floor surface
- Liquids, sludge or fine powders on floor surfaces - poor housekeeping
- Weather conditions – e.g. snow and ice

Trips can be caused by:

- Abrupt changes in levels
- Badly worn flooring
- Holes
- Trailing cables
- Materials or objects protruding into walkways

All of these can be compounded by inappropriate lighting. This may be from a lack of lighting, too much glare and also from the location of light switches.

The right footwear for the work being carried out footwear will be provided as part of the PPE programme. Monitoring for the causes of slips and trips will be the responsibility of all staff at Wrights of Twycross Ltd.

Manual Handling

Wright's of Twycross Ltd will comply with the Manual Handling Operations Regulations 1992.

In Particular, the company will:

- Avoid the need to handle loads using manual methods that could lead to injury so far as is reasonably practicable – mechanisation of tasks
- Where avoidance is not practicable, risk assessment of the remaining tasks will be undertaken by a competent person. Controls will be implemented to reduce the risk of manual handling injuries to the lowest level reasonably practicable
- All staff will undertake a manual handling in house training course delivered by the health and safety department during the induction.

Workplace Transport

Workplace transport is a major cause of serious and fatal accidents in the workplace.

To safeguard all persons on site, Wright's of Twycross Ltd. will ensure that:

- A risk assessment is carried out by a competent person regarding traffic movement. The traffic includes pedestrians and vehicles. Controls highlighted by the Risk Assessment will be communicated to all employees. Where possible pedestrians and vehicles should be segregated
- Visitors on foot will be always accompanied around site
- Directions will be provided to all visiting drivers to direct them to the reception area
- All site signage is always followed – signs will direct flows and instruct / remind drivers of rules
- Speed restrictions will be implemented on sites owned or operated by Wright's of Twycross Ltd– this speed limit is 5mph.
- Mirrors are installed for the use of drivers at difficult corners

- Reversing is avoided where possible. However, when this cannot be achieved, a banksman should be considered.
- Adequate car parking is available for vehicles left at the yard whilst staff operate away from site. This will prevent obstruction of traffic routes
- All access routes are kept clear
- PPE will be worn on site, toe capped boots and high visibility vests shall be worn
- A reasonable standard of driving is encouraged, all drivers should follow the Highway Code

Lone Working

Wrights of Twycross Ltd recognises that employees and self-employed staff, operating for and in the interests of the company, may work on their own at times. This group of lone workers are potentially exposed to the same hazards as groups who are supervised and therefore still require adequate controls to reduce the risks.

In addition to these risks, the following will need to be considered and controls implemented for:

- Violence including abuse, threats and assault
- Suffering ill health or accident in situations where it is difficult to alert colleagues or emergency services

Wrights of Twycross Ltd will therefore avoid the need to work alone where reasonably practicable.

Where lone working cannot be avoided, risk assessments will be undertaken, and the risk reduced so far as is reasonably practicable.

Equipment will be provided, maintained and used by the lone workers for obtaining support or the emergency services. Where arranged and agreed, lone workers will be checked on by their supervisor or colleague. Contact will be kept with the office or delegated representative during out of hours to ensure that lone workers are unharmed. Where additional support is required, debriefing and training will be provided.

Working at Height

Work at height is defined as:

- Work in a place that is above or below ground level
- Access or egress to a workplace other than using permanent fixings, that if controls laid down by the regulations were not take, the person could fall a distance and cause injury

Common factors that cause falls from height are:

- Failure to recognise a problem
- Failure to provide a safe system of work
- Failure to ensure that safe systems of work are being followed
- Inadequate information, instruction, training or supervision
- Failure to use appropriate equipment
- Failure to provide safe plant/equipment

The company will ensure that:

- Working at height will be avoided where possible
- Where it cannot be avoided, tasks will be risk assessed and these assessments will be communicated to all staff who will be involved in working at height
- Working at height will be planned, supervised and carried out in a safe manner by competent staff
- Equipment will be provided to prevent falling from height
- Equipment be provided to limit the distance of a fall from height
- Extra care will be taken on fragile surfaces and near skylight.

Electrical Equipment

Relevant legislation covering electricity on site is contained in the Electricity at Work Regulations 1989.

Portable electrical appliance and extension leads are subject to testing at recommended intervals by a competent person. The results will be recorded and the health and safety department/ Farm Office will keep these records. As well as this test, users will carry out a visual check of the lead, plug and casing where possible prior to use. If damage is visible, report immediately to the department Manager/ health and safety department. The item can then be repaired or removed from service and disposed of correctly. Any equipment that is no longer operational shall be stored in a designated area until disposal.

All fixed electrical equipment is subject to inspection and test at intervals of no greater than five years, as implicated by the IEE Wiring Regulations. Records will be kept in the health and safety office/ Farm Office. All electrical testing and repairs will be undertaken by a competent and suitably qualified person. However, apprentices can undertake work under close supervision but all work must be checked by a competent, suitably qualified person before equipment is energised.

Safe Plant and Equipment

Under Provision and Use of Work Equipment Regulations 1998 and Lifting Operations and Lifting Equipment Regulations 1998, Wrights of Twycross Ltd has a duty to ensure that all plant and equipment has appropriate risk assessments, maintenance and testing where required.

The health and safety department and line managers will be responsible for identifying all equipment that is used in each operation. The health and safety department will complete a risk assessment on all work equipment that carries a significant risk and where required a method statement will be created. The line managers will be responsible for ensuring that maintenance/inspection procedures are drawn up and followed. This will include isolations and locks offs to prevent systems being energised or operated whilst inspections or maintenance is undertaken.

All records for equipment that requires lifting, pressure or LEV (extraction systems) testing will be kept in the health and safety office. Any problems experienced with plant or equipment will be reported to the health and safety department and line managers.

Equipment such as plant, powered lift trucks, Heavy good vehicles, Agricultural equipment shall require trained and competent operatives.

Only trained personnel shall operate such equipment.

Records kept by Health and Safety department and or Farm Office

Pressure Vessels

All pressure vessels shall be tested to the Scheme of Work provided by the testing company to the Pressure Systems Safety Regulations 2000.

The health and safety department shall liaise with the external company to arrange for pressure vessels to be tested. Further liaison with the transport managers is required to organise the tank availability for the test. In order to test the tanks for road haulage, an internal examination shall take place every 24 months and a working test shall be carried out every 12 months. If any equipment is found to be defective, the report shall be sent to the maintenance director and the transport department will be informed so that defects can be rectified.

Training will be provided by the company in order to operate the tanks safely – see training arrangement. For entry into tanks for cleaning prior to examination see confined spaces arrangement.

Water Jetting

Water jetting carries the potential to cause serious injury. In order to reduce the likelihood of injury, Wrights of Twycross Ltd will:

- Ensure that all equipment is fit for purpose and maintained properly
- Ensure that all operatives are trained to a basic level of safety that incorporates the relevant Code of Practice associated with the safe use of water jetting equipment through an accredited external company (Water Jetting Association)
- Other areas of the task including manual handling and work equipment are covered in other arrangements in this policy

Display Screen Equipment (DSE)

It is the policy of the company to comply with the Health and Safety (Display Screen Equipment) Regulations 1992.

To ensure that the criteria outlined in these regulations are met, Wrights of Twycross will:

- Undertake suitable workstation risk assessments by a competent person and all findings will be communicated to the DSE users
- Pay for eye tests for all employees who are deemed DSE users by H&S department in line with current legislation.
- Where specialist operation requires specialist prescription safety eye wear, company shall purchase these for the user.
- Ensure that all tasks are planned by the supervisors to allow for changes of work activities to reduce any risk of repetitive strain injuries

Confined Spaces

Wright's of Twycross Ltd will, wherever possible, avoid the need to enter confined spaces.

Examples of confined spaces are:

- Tanks open to air
- Tanker trailers
- Grain drying bins

Where confined spaces need to be entered, a full risk assessment shall be undertaken by the health and safety department/ competent person.

Anyone who needs to enter a confined space **must** have confined space entry training to a recognised standard e.g. City and Guilds. Controls will be agreed with the health and safety department and line manager, dependant on type of entry.

Where an entry is required, air quality shall be measured using gas monitors appropriate for the task e.g. hydrogen sulphide, oxygen concentration

Entry with Full Breathing Apparatus

- Requires a team of operatives including a top man and an operative to operate the compressor to ensure a supply of fresh air is maintained throughout the task. Additional operatives should be on site dependant on site specific risks

Entry without Breathing Apparatus

- Requires a team of operatives to ensure the safety of staff who enter the confined space

Gas monitors will be worn at all times. Where an alarm sounds, the operative will leave the confined space immediately. 10 minute escape sets will also be carried during this confined space work.

There will always be a member of staff (Top Man) who does not enter the confined space and will be in possession of the site details. They will also have a clear understanding of the measures to undertake in the event of an emergency. This role can be rotated with staff to reduce exposure to potentially harmful gases.

When an entry is considered high risk (NC4 classified), a rescue team must be on site during all aspects of the operation.

Safe Handling and Use of Substances (COSHH 2002)

Under the Control of Substances Hazardous to Health Regulations 2002, Wrights of Twycross Ltd has a duty to assess the risks of using and creating hazardous substances during work activities.

Examples of substances that are used include various chemicals in liquid, powder or solid form. Dusts, fumes and vapours may be created during work processes.

The line manager will be responsible for identifying all substances that will need a COSHH assessment and will inform the Health and Safety department who will help the Line Manager conduct COSHH assessments. Copies will be available from the health and safety department - held on company intranet and on each premises as hard copy.

The health and safety department and respective managers and supervisors will be responsible for ensuring that actions and controls identified are implemented and used as stated by all at Wrights of Twycross Ltd.

All risk assessments will be reviewed at a given time period or whenever the material safety datasheet or substances are changed.

Personal Protective Equipment (PPE)

It is the policy of Wrights of Twycross Ltd to comply with Personal Protective Equipment at Work Regulations 2002.

It is recognised that PPE is considered as a last resort and wherever possible hazards to health and safety should be controlled using other methods.

Wright's of Twycross Ltd will ensure that:

- A PPE risk assessment defines the characteristics of the PPE required for the work and ensures equipment is suitable
- All PPE will be maintained and accommodated when not in use and kept in a clean / dry condition
- Employees will be trained, instructed and informed of the correct method of use
- Records of issue will be kept by the Health and Safety department

Noise and Vibration

Wrights of Twycross Ltd are aware of effects caused by Noise and Vibration in the workplace and therefore, will comply with the Control of Noise at Work Regulations 2005 and the Control of Vibration at Work Regulations 2005 where applicable.

Where suspected, noise and vibration assessments will be carried out. All findings of the assessment will be communicated to the relevant employees. Equipment will be checked for noise and vibration on potential purchases and quieter equipment with less vibration will be considered.

Where any noise levels are approaching 85dB – wearing of hearing protection will be mandatory.

Noise and vibration from existing equipment will be reduced so far as is reasonably practicable by:

- Maintaining machines
- Sound reducing baffles on machines
- Isolating/enclosing of noisy processes
- Training regarding noise and vibration and its effects
- Staff rotation to reduce exposure to noise and vibration
- Appropriate ear and hand protection provided

Staff who are identified as being at risk will undergo regular occupational health monitoring provided by an external company. This data will help with the monitoring of controls implemented.

Stress

Wrights of Twycross Ltd will do everything that is reasonably practicable to reduce the risk of workplace stress. If any member of staff feels that they are suffering from workplace stress they should report and discuss in confidence with management.

Recognising Stress

Physical symptoms can be panic attacks, tiredness, headaches, high blood pressure, tingling in extremities, light headedness, poor digestion and insomnia

Emotional symptoms could be anxiety leading to clinical depression, irritability, mood swings, generally not behaving as normal

Mental symptoms include inaccuracy, indecisiveness, judgement impairment and less motivation

This is not an exhaustive list

Stress can also lead to an increase in the use of stimulants such as caffeine, nicotine, alcohol and drugs. This can make the problems worse with regards to stimulation of chemicals in the body. Also, impairment due to drugs/alcohol will prevent safe working practices being undertaken and will pose dangers not just to the person suffering stress, but others also. (See drug and alcohol policy)

Factors that contribute to stress:

- Bullying and harassment
- Blame culture
- Lack of communication
- Long hours or excessive unsocial hours
- Conflicts between management and work colleagues
- Uncertainty regards job prospects and progression
- Workload – too much or too little

Helping to Prevent Stress

Key factors include:

- Providing a supportive work environment
- Fostering a culture of respect and good relationships between employees
- Encouraging active involvement with decision making and team approaches
- Dealing with employees in a sensitive and caring manner
- Adopt a problem-solving approach, rather than a blame culture whenever problems are identified
- Regular monitoring of employees' satisfaction and wellbeing

Drugs and Alcohol

The company recognises the impact that drug and alcohol use may have on an individual's ability to work safely. To manage misuse, random drug and alcohol testing is conducted regularly

Drugs

In order to ensure that the testing is random, the following procedure is adhered to:

- Employee payroll numbers are provided to the health and safety department from the HR department
- 5 payroll numbers are picked at random and then HR are asked for the name associated with those numbers
- The testing will be conducted away from work colleagues
- Only the selected person, the tester and a witness will be in the room
- A consent form will be completed prior to the test with any information regarding prescribed medication or admissions
- Where a positive result is obtained, the company may begin the chain of custody process
- Line manager and senior management will be informed of the results and appropriate action taken

Alcohol

- The key safe has a breathalyser installed. This randomly selects individuals who are trying to obtain keys
- Where a positive result is given, the safe will remain locked and will automatically inform the line manager of the result
- The company also has access to a portable breathalyser to allow random checks to be undertaken off site
- Appropriate action will be taken by senior management where necessary

Occupational Health

The workplace can cause multiple illnesses as well as injuries. In order to reduce the effects of work activities on the health and wellbeing of the staff Wrights of Twycross Ltd will:

- Identify the hazards that may lead to ill health through risk assessments
- Identify the persons whose health may be at risk from the workplace activities
- The health and safety department will monitor activities undertaken and offer advice to make employees aware of any health implications associated with the task
- A health questionnaire is completed during induction at the start of employment to ascertain any ongoing health conditions
- Questionnaires on specific health topic areas are undertaken and where necessary, individuals are referred to an external occupational health provider for further health surveillance
- Where further action is required on advice from Occupational health provider, meeting will be held with employee involved, their line manager and human resources. Where necessary health and safety and directors responsible for the employee and working section will also sit in where required.
- The meeting to decide upon any further controls that will need to be implemented and who will need to be instructed of the findings – other employees, contractors, visitors and enforcing bodies – HSE for example

Lifting Equipment

Lifting equipment and accessories are used extensively throughout the business. Failure of lifting equipment can be catastrophic and lead to fatality and major injury to the staff of Wrights of Twycross Ltd, customer staff and members of the general public in some cases.

- All equipment and accessories that are used for lifting items shall be tested at required intervals by external provider to Lifting Operation and Lifting Equipment Regulations 1998
- All tested items that are suitable and safe for use will be marked with identification and Safe Working Load (SWL)
- All tested item will be colour coded for time in test.
- Items with incorrect colour code tag shall be removed from service until such a time as it can be retested and proven to be safe.
- Lifting equipment shall be purchased from reputable suppliers and be provided with certificate of safety.

Hot work (welding, grinding, cutting)

Where repairs and fabrications are to be made, there is an increased risk of fire or personal injury. The main fire prevention methods are stated earlier in the health and safety policy.

- Where hot work is carried out, all combustible materials shall as far as reasonably practicable be removed
- Where materials with the potential to ignite are present and cannot be removed, fire blankets and fire watcher to be implemented to ensure that hot work does not catch fire. Powder fire extinguisher to be readily available.
- Where potential for others in workshop to be affected by process – (arc eye, spark burns) Screens shall be erected around process to protect others.
- LEV and general ventilation shall be provided for required hot work processes and LEV tested under COSHH 2002 every 14 months
- PPE relevant to hot work process will be issued free of charge by the company inclusive of individual full-face masks providing clean supply of air to users.
- Engineering controls - LEV, General ventilation, mobile exhaust ventilation, process safety and RPE hoods with battery fresh air filters to be worn due to welding COSHH assessment.

Maintenance

Maintenance covers a wide area of company assets from buildings and is required to ensure the continued safe usage and operation. Maintenance, as sometimes infrequent, can present the most challenging and hazardous situations and risk associated with it.

- Maintenance will be planned as far as is reasonably practicable.
- Hazards identified and risks assessed. Adequate controls as per risk control hierarchy to be implemented as stated on this policy for individual hazards
- The maintenance should be carried out by suitably competent persons. Where these competencies are not available to the company from its own employees, other external bodies to be employed to undertake such tasks.
- Where work is undertaken on properties, all works will be carried out in accordance with the CDM Regulations 2015. Where the project has more than 20 persons and it lasts over 30 days or 500 person days – the HSE will be notified using a Form 10 (F10).

Monitoring and Reviewing

To ensure that the company's commitment to health, safety and welfare is actively pursued, the health and safety department will examine the implementation of this policy. This will be done by undertaking regular audits and inspections of the equipment, premises and work activities that are carried out therein.

This policy will be reviewed should any changes occur in accordance with HSE guidance.

Management should be informed if there is any uncertainty about issues addressed in this policy.

Issue number	Amendments - comments	Date	Signed
V8.00	Reviewed – FLO names removed from responsible persons list, added Beanfield Farm onto the policy ref H&S Poster & First aid kit. Confined space – added 10 minute escape set MUST Be carried	March 2019	<i>A. Boulstridge</i>
V9.00	Names amended in responsibilities and Specifics - welding COSHH amended due to new guidance. Driving assessment changed to third party assessors	March 2020	<i>A. Boulstridge</i>
V10.00	Names amended and responsibilities - WD removed at present, B.H removed and C. D & P.B added Items reworded on arrangement: Risk assessment – responsibility placed on competent managers Dynamic Risk Assessment - Job Watch Added Safe Systems of work – safety bulletins Control of Contractors - receive specific customer induction Information Instruction and Training - departments added License checks - departments added HGV Competence - amended persons allowed to assess HGV Accidents, First Aid and wellbeing – recorded procedure using mail system and investigations added to managers responsibilities Manual Handling - refresher training to be completed every 5 years Safe plant and equipment - Line manager added as responsible for their equipment for testing and maintenance. Pressure Vessels - test intervals to 24 months and tanks working test in between to check Pressure /Anti vac valves done in house. Valves overhauled to manufacturers requirements. Confined Spaces - Risk assessment carried out by Line manager in conjunction with H&S department - Air trailer as well as compressor added and gas monitor reworded to air quality monitor. Noise and Vibration – note 'Where highlighted' Lifting equipment – managers to remove items from service if not within test date. Must request retest if not within test dates	March 2021	<i>A. Boulstridge</i>
V10.1	Amendment to job roles for CD and PB	September 2021	<i>A. Boulstridge</i>
V10.2	PB removed and Job role changed for AJB	March 2022	<i>A. Boulstridge</i>
V11.00	Annual Review - George Brain Job role changed to Director	March 2022	<i>A. Boulstridge</i>
V11.1	Policy updated to current regulations and brought in line with P.A Wright and Sons Ltd H&S Policy V2.0. Personnel amended on Responsibility Section.	November 2022	<i>A. Boulstridge</i>
V12.0	Annual Review - Responsibilities amended RW Included and KRO responsibilities amended .	April 2023	<i>A. Boulstridge</i>

