Clews Recycling Ltd

Health & Safety Policy

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Clews Recycling Ltd

Health and Safety at Work Act 1974

Clews Recycling Ltd - Health and Safety Policy

Part One:
Policy Statement

1.1 Introduction

In accordance with the Health and Safety at Work Act 1974, this document sets out the policy of Clews Recycling Ltd concerning the health safety and welfare of all employees and any others who may be affected by our activities.

It also explains the organisation and arrangements that Clews Recycling Ltd has established in order to put this policy into effect.

We accept that it is our duty to ensure as far as reasonably practicable the health safety and welfare at work of all employees and any others who may be affected by our activities.

Clews Recycling Ltd recognises that commitment to health and safety is of paramount importance and it will always be viewed as a core function of our business, which we will constantly strive to improve through a robust health and safety management system.

Clews Recycling Ltd regards health and safety as the responsibility of everyone within the organisation but also recognises that employees at all levels have specific responsibilities to comply with and contribute towards the effectiveness of this policy.

We will ensure that appropriate levels of resources are allocated in order to support health and safety, we will support a positive health and safety culture and we will actively encourage the support and involvement of employees in all matters of health and safety either as individuals or through their representatives.

We will ensure that our policy and procedures are regularly and adequately reviewed with the aim of continual improvement and compliance with statutory requirements.

1.2 Statement of Intent

Clews Recycling Ltd commits itself as far as reasonably practicable to meeting the following objectives:

- To ensure that all health and safety risks arising from the activities of Clews Recycling Ltd are assessed and that suitable steps are taken to remove or control these risks. The process of risk assessment will be used to ensure that this is done in a systematic and effective way.

- To consult with employees on matters affecting their health and safety.

- To provide and maintain safe plant, equipment and systems of work.

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- To ensure the safe handling, storage and transport of articles and substances.
- To provide information instruction supervision and training to all employees including agency personnel or contractors. To ensure that all persons who perform work for or on behalf of the organisation are competent to undertake that work.
- To prevent accidents and cases of work-related ill health.
- To maintain safe and healthy working conditions that will include a safe and healthy working environment and the provision of adequate welfare facilities.
- To monitor health and safety procedures to ensure that all relevant statutory requirements regulations and codes of practice are complied with and that any additional measures considered necessary are taken.
- To review and revise this policy as necessary at regular intervals.

Signed

Richard Clews - Managing Director

Date 23rd July 2019

Clews Recycling Ltd

Part Two:
Health and Safety Organisation and Responsibilities

This section describes how Clews Recycling Ltd will organise and allocate responsibilities for health and safety throughout the organisation.

2.1 The Managing Director

The managing director will ensure there is a process in place for the implementation and communication of the Company Health and Safety Policy and will ensure that an effective Health and Safety Management system is in place whereby the health and safety responsibilities of the individual directors, managers, supervisors and employees are clearly defined and accepted and where individuals will be held accountable for discharging their responsibilities.

Ensure there is an effective system in place to monitor and measure health and safety performance.

Ensure that managers develop the necessary company processes in order to deliver effective health and safety management throughout the organisation.

Ensure the necessary time and resources are in place for the successful and continued implementation of the Health and Safety Policy including the provision of specialist advice and assistance as required.

Consult with health and safety managers or consultants on any changes in legislation that may have an impact on the operations of the company and to act as necessary to ensure continued compliance with statutory requirements, regulations and approved codes of practice.

Promote health and safety at every opportunity setting a personal example in all aspects of health and safety.

Ensure individuals at all levels throughout the company, are held accountable for their health and safety performance.

2.2 Managers

All managers will ensure that the contents of the Health and Safety Policy are effectively communicated to all staff within their area of responsibility, and that arrangements are followed within their area of control to ensure the effective implementation of the policy.

Where English is not the first language of the employee, any written instruction will also be given in their native language. If this is not possible, the manager will take extra steps through questions/answers and on-going monitoring to ensure the employee has understood instructions given in English.

Managers will have at least a basic understanding of The Health and Safety at Work Act 1974 and preferably trained up to IOSH standard.

They will keep themselves abreast of changes in Health and Safety law and any other legislation relevant to their area of control.

Ensure at all time as far as reasonably practicable in accordance with the Management of Health and Safety at work Regulations 1999 the provision of:

- A safe working environment.
- Safe entry and exit to and from all work areas.
- Adequate welfare facilities.
- Safe systems of work.
- Safe plant and equipment.
- Adequate training information and instruction for all employees within their work area.

Conduct risk assessments in conjunction with the supervisors of their work and processes under their control to identify hazards, assess the risks and introduce adequate control measures in order to reduce risk to an acceptable level.

Ensure all risk assessments are reviewed regularly to ensure any control measures are working effectively. Risk assessment should be reviewed at least annually but should be reviewed immediately if there has been significant change to the work operation or there is reason to believe they are no longer effective.

Where necessary, arrange for additional guidance, safe systems of work or procedures to be produced in conjunction with the health and safety manager to cover specific work activities either on or off site.

Ensure that adequate arrangements are made for employees under their control to receive sufficient information, instruction, training and supervision to allow them to work safely and fulfil their responsibilities.

Arrange for first day Health and Safety Induction Training to be carried out for all new employees including agency workers or sub contract workers.

Ensure that contractors working within their work area receive suitable information to allow them to work safely and without risk to themselves or others.

Ensure all staff that report to them, are held accountable for their actions in terms of health and safety.

Bring to the attention of the company health and safety manager or consultant any safety issues that cannot be resolved satisfactory.

Carry out regular safety inspections of their workplace area with a view to identifying hazards or unsafe practices and record.

Record and investigate accidents, incidents and near misses and work-related ill health in accordance with company procedures.

Ensure that any plant machinery or equipment being used in their work area is suitable for the purpose, maintained in good working order, and where necessary tested in accordance with statutory requirements.

Check that hired plant and equipment is safe and where appropriate that copies of any current test certification are available for inspection.

Arrange for portable electrical appliances used in their work area to be inspected and tested at appropriate intervals in accordance with company procedure.

Assess the need for Personal Protection Equipment (PPE) and clothing for persons working under their control. Ensuring where it is provided it is suitable, correctly used, stored, maintained and that users are trained in its correct use and advised of replacement procedure.

Ensure that employees are consulted on and given the opportunity to discuss the development or introduction of new plant, equipment, and systems of work or substances or any other health and safety matters likely to affect them.

If required seek guidance from the company health and safety manager or consultant and any other specialist on health and safety matters and act appropriately upon any advice received.

Promote health and safety at every opportunity setting a personal example in all aspects of health and safety.

2.3 Supervisors

All supervisors will have a basic understanding of The Health and Safety at Work Act 1974 and any other legislation relevant to their area of control.

Ensure that all employees work with due care for the safety of themselves and others, and in accordance with the Company's Health and Safety policy or any other relevant health and safety procedure or requirement.

Carry out regular inspection of their work area.

Ensure that all employees are trained and competent to perform their duties in a safe manner and that all training takes place under the supervision of a competent person.

Ensure all accidents and incidents and cases of work-related ill health are reported in accordance with the company procedures.

Ensure so far as is reasonably practicable that all plant and equipment is safe and fully effective, maintained in good working order, that guards and safety devices where fitted remain in place, and testing has been carried out in accordance with any relevant regulations or statutory requirements.

Ensure that all plant and equipment that is faulty or in an unsafe condition is reported to the appropriate person(s) and removed from use until all necessary rectification work has been carried out.

To ensure that only authorised and competent persons carry out plant and equipment repairs and maintenance.

Set a personal example in health and safety by ensuring all safety procedures are followed, that all work equipment is used in the correct manner and that personal protective equipment is worn where required.

Deal with in accordance with company procedure any employee who by their actions puts themselves or others at risk.

If required seek guidance from the health and safety manager, or consultant on health and safety matters and act appropriately upon any advice received.

An understanding of the Company's Health and Safety policy and all other relevant health and safety procedures in order to be able to advise employees on the correct course of action in order to address health and safety issues or concerns.

Bring to the attention of management any hazard or health and safety concerns.

Meet regularly with the health and safety manager or consultant to formally discuss matters of health and safety.

Assist managers in the carrying out of workplace inspections.

Promote health and safety at every opportunity setting a personal example in all aspects of health and safety.

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Part Three:
Health and Safety Arrangements

3.1 Risk Control

To ensure compliance with regulation 3 of the Management of Health and Safety at Work Regulations 1999, a suitable and sufficient risk assessment of all work activities will be undertaken.

In addition to the Management of Health and Safety at Work Regulations 1999 there are other regulations that specify the requirement for Risk assessment to be carried out.

These regulations include:

- The Workplace (Health Safety and Welfare) Regulations 1992
- The Personal Protective Equipment Regulations 2002
- The Manual Handling Operations Regulations 1992
- The Display Screen Equipment Regulations 1992
- The Control of Substances Hazardous to Health Regulations 2002
- The Provision and Use of Work Equipment Regulations 1998
- The Lifting Operations and Lifting Equipment Regulations 1998
- The Control of Asbestos Regulations 2006
- The Control of Vibration at Work Regulations 2005

The managers and or consultants responsible for the area where the work operation is undertaken, or by persons nominated by those managers will carry out assessments.

The assessments will be carried out in consultation with persons involved in the work operation.

All risk assessments will be carried out using standard company risk assessment forms and procedures and in accordance with the procedure guidance form.

The health and safety manager or consultant must approve all risk assessments.

All persons who are required to either carry out or approve risk assessments will be competent to undertake these tasks and any training required will be carried out or arranged by the health and safety manager or consultant.

The significant findings of assessments will be recorded and communicated to any persons who might be at risk from the work operation.

Managers will be responsible for ensuring that any control measures recommended by the assessment remain in place.

All assessments will be reviewed at least once a year or immediately if:

- There has been significant change to the work process or work environment.
- There has been a serious or major accident.
- It is felt that the control measures are not effective.

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Risk Assessments

Managers will develop a planned and systematic programme for undertaking risk assessments of all work operations within their area.

Each manager will prioritise the risk assessment process giving priority to all those activities where there is significant risk and potential for the most adverse and severe outcomes.

Control of Substances Hazardous to Health (COSHH)

The manager will ensure that for substances used in the workplace, that the relevant material safety data sheets (MSDS) is obtained from the manufacturer or supplier and the information made available to staff who will use it in a format they can understand.

The manager responsible for the area of use will carry out or arrange for an assessment of any risk associated with the use, handling, storage and transportation of all such materials or substances, before any work with them commences.

In certain circumstances health and environmental monitoring systems will be put in place to ensure that the required control measures are effective.

Noise

The company will carry out periodic noise level and noise exposure surveys and act promptly on their findings.

We will as far as is reasonably practicable reduce noise in the workplace to a safe level that is without risk to employees or any others who could be affected.

When noise and exposure levels exceed safe levels or action levels as specified by the Noise at Work Regulations 2005 we will take action to protect the health of all those who may be affected. First action level is 80 dB with second action levels set at 35 dB.

These actions may include:

- Carrying out a noise assessment.
- Reducing the noise by engineering means.
- Providing suitable hearing protection and training in their use.
- Informing those who may be affected of any noise hazard.
- Creation of mandatory hearing protection zones.
- Audiometric testing.

Display Screen Equipment

Managers or their appointed persons will carry out regular assessments of all display screen equipment users within their area of control as required by the Display Screen Equipment Regulations 1992.

The purpose of the assessment will be to identify any issues relating to the user's workstation layout or working procedure that could put the user at significant risk from work related ill health such as:

- Musculo-skeletal complaints.
- Work related upper limb disorder (WRULD).
- Fatigue or stress.
- Visual fatigue (Eye strain).

Regular or substantial display screen users will be entitled to free eye tests (normally every 2 years).

First Aid

An assessment of first aid requirements will be carried out for each site.
The assessment will consider:

- The number of employees.
- The type of work activities and hazards present considering probable or most likely types of injury.
- The size of the site and its location in relation to nearest medical services.
- Shift patterns and availability of first aiders.

An assessment of the risks to first aiders and appointed persons will also be carried out in particular with regard to the presence of serious and imminent danger and risk of infection from blood or bodily fluids. *(See also First Aid facilities).*

Fire Precaution

Suitable risk assessments will be undertaken for:

- Fire Prevention (Measures intended to stop a fire from occurring)

- Fire Protection (Measures intended to save life, minimise injury or loss in the event of a fire)

(See also Fire and Emergency Procedures).

Maintenance Operations

Competent persons will carry out maintenance operations only.

Suitable risk assessments will be carried out for all maintenance work. Some maintenance operations will require additional safety procedures such as lock off procedures permit to work systems or written method statements.

Examples of these are:

- Work, which requires special purpose access or lifting equipment being brought onto site

- Working at height
- Working in confined spaces
- Work on live electrical installations or equipment

Risk assessments and method statements must be agreed and signed off by the health and safety manager or consultant before work commences.

Work on electrical equipment or qualified and competent people will carry out installations only, and in accordance with the requirements of the Electricity at Work Regulations

Control of Contractors

Contractors will be selected in consideration of their competence to perform the work and their ability to provide evidence of good health and safety performance.

Contractors will be required to provide suitable risk assessments and safe systems of work for the work they propose to undertake, which must be approved by the manager in charge.

The company will provide contractors with comprehensible information on all aspects of health and safety arising from our activities.

Contractors will be instructed in the emergency evacuation of the site; the location of fire exits and safe assembly points and will be informed of the location of first aid and welfare facilities.

Contractors will be made aware of any site-specific hazards that exist, including the location of any asbestos containing material.

Contractors will be designated a person to whom they should report and that person will be responsible for taking charge of them in the event of an emergency.

The manager or supervisor responsible for a contractor whilst they are on site, will monitor their work activities to ensure it does not put themselves or others at risk.

Control of Asbestos

Clews Recycling Ltd will as far as is reasonably practicable comply with our specific duties under the Control of Asbestos Regulations 2006.

Each site will prepare and hold an asbestos management document, which will include the following where applicable:

- Asbestos policy
- Management plan
- Site plans showing location of asbestos containing materials ACMs or assumed ACMs.
- Asbestos survey
- Site plan showing location of any ACMs
- Material assessment
- Priority assessment

- Risk assessment (Exposure to ACMs)
- Risk assessment Work likely to disturb ACMs

Pregnant or Nursing Mothers

Where an employee notifies the company that she is pregnant or she has recently given birth, or that she is a nursing mother, a review of all risk assessments relating to work or tasks undertaken by that employee will be carried out, to ensure that neither the mother or child is placed at risk.

Young Persons

Under normal circumstances no person will be employed under 18 years of age.

When a person under the age of 18 is employed a risk assessment will be undertaken in order to identify any risks to health and safety, which are a consequence of their age in particular with regard to their level of maturity, lack of experience or absence of awareness of risk.

A copy of the risk assessment will be given to the young person and his or her manager will discuss the assessment with them to ensure that they fully understand the assessment and the control measures.

Non-English-Speaking Operatives

The company has a duty to provide information, instruction, training and supervision and making sure all their workers can understand it. Wherever possible, a copy of written instructions will be given in their native language as well as English.

The company are to make sure overseas workers have the necessary knowledge and skills to do the work for which they have been employed, competently and safely;

The company will use an employee who speaks good English to act as interpreter.

See Manager's responsibilities.

The Public

The safety of the public will be paramount at all times and this will be communicated via a site health and safety leaflet and health and safety notification and signs.

Members of the public will be accompanied by a member of staff at all times whilst they are on site.

Where a member of the public needs to visit the working area, the member of staff must explain to them the major risks associated with that working area.

Working at Heights

Any company activities which involves working at heights will be assessed taking into account the working at heights regulations 2005

Any PPE that has been identified from the risk assessment will be provided and training given with regards to its correct use.

Working at height has no set limit under the 2005 working at heights regulations. Working at height does not include access going up or down a permanent stair case, slip/trip on a level. The risks and training requirements will be based upon height and time working at height. All persons working at height will be required to be competent to work at height.

3.2 Communication and Consultation

Managers will ensure that information on health and safety is communicated to all persons within their area of reasonability.

Health and Safety will be a standard item on the agenda of all management meetings.

The company will strive towards continual improvement of the standard of Health and Safety awareness and practice in the work place and instigate a process of

-Inspection of the work place
- Identification of risks
- Discussion of actions to be taken to remove the hazards with the management and workforce
- Issue of combined Risk assessment and method statement
-Communication of the Risk Assessment and method statement to the work force
- Implementation
- Monitoring of the implementation
- Review of the Method statement

Clews Recycling Ltd will consult with employees on any measure in the workplace which may substantially affect their health and safety, including any changes in working practices or systems of work or the introduction of new equipment, work processes or substances.

This will be done either directly or through elected employee safety representatives.

Cooperation with Others

Where our operations may have effect on others, for example as a result of the proximity of our premises in relation to those of others, or when working on the same construction site or work location, we will as far as reasonably possible cooperate with those persons on matters of health and safety in order to ensure the safety of all.

We will take all reasonable steps to inform them of the risks arising out of our activities.

3.3 Safe Plant and Equipment

Managers will ensure safe plant and equipment within their area of control by:

- Consulting with employees on the introduction of new equipment or modification of existing equipment, ensuring that all new equipment is suitable for the purpose and meets relevant safety standards.
- Considering the effect of new equipment on employee safety or the environment.
- Undertaking suitable risk assessment on the use of all work equipment and lifting operations.
- Ensuring that all equipment is part of a planned preventative maintenance system which will include regular guard and safety device checks.
- Only allowing trained employees or employees under supervised training to operate equipment.
- Ensuring that any training in the use of lifting equipment, including forklift truck, is carried out by an RTITB accredited trainer.
- Arranging for statutory inspection of relevant equipment.

Mangers will also ensure that these requirements form the generic control measures of all risk assessments carried out on the use of work equipment and lifting equipment.

The health and safety manager or consultant will ensure that arrangements are in place for statutory inspection, by competent persons, at intervals compliant with the requirements of relevant regulation. Inspection results must be recorded.

Managers will provide an inventory of all equipment subject to statutory testing within their areas of control and ensure that they are available for statutory inspection.

3.4 Information Instruction Supervision and Training

In order to ensure the capability and competence of our employees to perform their duties in a safe manner, we will ensure that employees are provided with adequate information instruction and supervision and training.

This training will be in accordance with the organisations training and development policy.

All new employees, including agency or temporary workers or sub-contract workers, will undergo an induction-training programme that will include the following Health and Safety specific subjects:

- The Clews Recycling Ltd Health and Safety Policy including employee's responsibility and specific duties under and the Health and Safety at Work Act 1974 sections 7 and 8.
- Fire safety and evacuation procedure.
- First Aid facilities and accident reporting.
- Manual Handling including safe handling, transport and storage of job specific articles.
- Safety awareness and risk assessment.
- New environments and Site safety, Office safety (if applicable).
- Working off site and construction site safety.
- COSHH requirements, safe handling of hazardous substances.
- Personal protective equipment (PPE).
- Housekeeping.

- Tour of the site including fire exits assembly points, first aid and welfare facilities.
- Identification of first aiders, managers and supervisors.

Further or additional information instruction and training will be given when employees are:

- Exposed to new or increased risk due to being transferred to another job or department.
- Exposed to new or increased risk due to the introduction of new work equipment, processes, materials or substances or a change to existing work equipment, processes, materials or substances.
- Exposed to new or increased risk due to the introduction of new technology.
- Identified as requiring further training or training updates.

Managers are responsible for ensuring that all health and safety training records are up–to-date and available for inspection or audit.

If an employee identifies any shortfall in Health and Safety training, they must inform their manager or supervisor immediately.

Managers or supervisors will act immediately to address any shortfall in Health and Safety training.

3.5 Accident Reporting and Investigation

The company will hold a company accident book (B1510) type in a room designated for use for the purpose of administering first aid.

The accident book will be available at all times.

All accidents must be reported to a supervisor or manager and recorded in the company accident book, including accidents involving persons not employed by Clews Recycling Ltd i.e. contractors, clients, members of the public etc, that arise out of our work activities.

In order to comply with the requirements of the Data Protection Act 2002 arrangements will be in place to ensure that completed accident record sheets are stored in a secure location.

All RIDDOR recorded accidents must be investigated using the appropriate company accident investigation form.

This includes accidents or incidents where no one has been injured but where there was a potential for injury or damage to occur (near miss), and including physical assault and work-related ill health including work related stress.

The purpose of the investigation will be to prevent further occurrence by establishing the immediate cause, identifying any contributory cause or unsafe conditions and implementing any required action or control.

Accidents occurring at other sites or locations must be recorded in that sites accident book and also be reported to the department manager at the first opportunity.

All accident records must be retained and be made available for inspection or audit.

The company has a duty under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR) to report fatalities, major injuries, injuries resulting in an employee being unable to perform their normal work for more than three days and certain diseases or dangerous occurrences.

For further details refer to HSE guidance booklet "RIDDOR explained" IBSN No: 07176 2441 2.

The health and safety manager or consultant must be informed of all such injuries diseases or dangerous occurrences in order to ensure that they are reported in accordance with the regulations, within the regulations required timescales and that a suitable investigation is carried out.

3.6 Safe and Healthy Working Conditions

Workplace (Health Safety and Welfare) Regulations 1992

The company will comply with the requirements of the Workplace (Health Safety and Welfare) Regulations 1992 in order to provide a safe and healthy environment. In particular with regard to the provision of:

- A clean and tidy workplace with clearly defined walkways and traffic routes maintained in a suitable and safe condition.
- Adequate first aid facilities.
- Suitable lighting, ventilation and indoor temperature.
- Suitably designed workstations, suitably maintained equipment.
- Adequate washing and toilet facilities and supply of wholesome drinking water.
- Accommodation for clothing, facilities for changing clothes for special purpose or health reasons.
- Facilities to rest and eat meals in a clean non-smoking environment away from the normal work area.
- Shower facilities when applicable for special health reasons.

First Aid Provision

A first aid area and box will be kept adequately stocked.

The room or area will be inspected and cleaned regularly and waste disposed of through the appropriate route.

First aiders or appointed persons will be responsible for ensuring that first aid rooms are kept clean and adequately stocked.

The names and usual location of trained first aiders and/or trained appointed persons will be displayed in the workplace.

Vehicle first aid kits will be provided and vehicle drivers must ensure that they are maintained to the required standard of content.

Occupational Health

If the Health and Safety consultant or manager identifies a risk that they consider could present a short- or long-term ill health hazard to the workforce, the company will use occupational health monitoring systems, these may include if required:

- Audiometric testing
- Blood testing
- Eyesight testing
- Pre-employment medicals
- Periodic job specific medicals
- Environment testing

Environmental Issues

Clews Recycling Ltd will consider at all times the environmental effect of our operations in particular with regard to noise, dust, fumes, disposal of waste products and chemicals, the consumption of energy, infection risks and natural resources.

The company have prepared and implemented an environmental policy, which will be committed to reducing as far as reasonably practicable any detrimental environmental impact that could be caused by our operations or work activities.

3.7 Fire and Emergency Procedures

The health and safety manager or consultant will carry out fire risk assessments and ensure there are adequate arrangements in place to prevent fire and to protect all persons against the risk of fire.

Department managers will arrange a suitable site-specific evacuation procedure.

Managers will be responsible for ensuring these arrangements remain in place, and are brought to the attention of all staff and visitors to the site and displayed in the workplace.

Managers and supervisors will carry out regular inspection of the workplace to ensure the risk of fire is controlled and that escape routes and fire exits are kept clear and that signage and firefighting equipment remains in place.

A competent person will test fire alarms and emergency lighting regularly. Competent persons will regularly test automatic fire warning and fire extinguishing systems such as smoke detectors or sprinklers.

Managers will ensure that all employees within their control receive appropriate instruction and training and that they fully understand the fire precautions, the action to take in the event of fire and the location of their nearest fire exit and safe assembly point.

3.8 Safety Inspections

Managers and supervisors have a responsibility for carrying out regular safety inspections of their area of control.

Each manager will in association with the health and safety manager or consultant, develop a specific inspection sheet suitable for their workplace and work operations, which will take into account specific working arrangements conditions or hazards.

Managers will carry out weekly inspection and take action to ensure that:

- Housekeeping standards are acceptable, working areas are clean, tidy and free from obstruction, gangways, pedestrian access stairs and access ramps are clearly marked and free from obstruction.
- Plant, machinery, equipment and tools are being used safely and are suitably maintained.
- First aid facilities are suitable and adequate.
- Fire exits and escape routes are clear and adequate signage remains in place.
- Lighting is adequate in all areas.
- Personal protective equipment (PPE) is being used and stored correctly.
- Hygiene and sanitation facilities are adequate and suitably maintained.
- Ventilation and extraction equipment are in working order and suitably maintained.
- Any new or unusual activities such as maintenance work including the presence of contractors are controlled.
- Any other hazard or unsafe practice is removed or controlled immediately or within a suitable agreed time frame.

Supervisors will carry out daily inspections and take action to ensure that:

- Housekeeping standards are acceptable, working areas; gangways, pedestrian access, stairs and ramps are clean tidy and free from obstruction.
- Plant and machinery is safe for use.
- PPE is being worn correctly.
- Fire exits and escape routes are clear.

All inspections will be recorded including a record of non-conformities and action taken to address them and the manager will retain the records, which will be made available for audit.

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Part Four
Monitoring, Measuring and Reviewing Safety Performance

The Health and Safety at Work Act 1974 requires Clews Recycling Ltd to monitor the effectiveness of the Group's Health and Safety Policy.

We will achieve the objectives of the health and safety policy statement of intent by an effective proactive and reactive monitoring process.

4.1 Proactive Monitoring

Proactive monitoring will ensure that control measures and safety procedures are in place.

It will identify potential areas of concern and ensure that they are addressed before injury or loss occurs.

Proactive monitoring is dependent on the effectiveness of the following:

- Audits and reviews
- Workplace inspections
- Trend analysis
- Individual target and objective achievements

4.2 Reactive Monitoring

Reactive monitoring will establish what has already gone wrong and help to reduce the reoccurrence of accidents in the future.

Reactive monitoring is dependent on the effectiveness of the following:

- Accident and incident reporting.
- Accident reporting processes.
- Accident investigations.
- Analysis of accident data and trends.
- Remedial action.

4.3 System Audit

The health and safety manager or consultant will carry out a half yearly audit of the effectiveness of the health and safety systems throughout the site and will provide a report containing any non-conforming items and any relevant recommendations for address or improvement where necessary.

The information from these audits will be collated and considered with other safety performance information during the annual review process, in order to consider health and safety performance and the effectiveness of the policy

4.4 Annual review

The company will consider the policy in terms of the use made of it by all those with organisational responsibility.

The review of the company's safety performance and the effectiveness of the Policy will be undertaken by the health and safety management committee in consultation with other relevant persons including health and safety representatives.

The review will be carried out annually or more frequently if there has been significant change to the organisational structure, the nature of the business or there is reason to believe it is no longer effective.

The review will consider the contents of this document against effective implementation and safety performance and identify ways in which our safety performance can be improved taking into account the results of system audits and trend analysis.

Changes to the policy may be made in order to ensure its effectiveness in meeting the requirements of our statement of intent.