

**E.J Shanley & Son (Trowbridge) Ltd**

**43 Shails Lane**

**Trowbridge**

**Wiltshire**

**BA14 8LN**

**HEALTH, SAFETY & ENVIRONMENTAL POLICY**

**Contents**

1.0 General Statement of Intent

2.0 Roles and Responsibilities

3.0 Arrangements

3.1 Safety Audits and Monitoring

3.2 Guidance

3.3 Hand Arm Vibration Syndrome (HAVS)

3.4 Health & Safety Records

3.5 Asbestos

3.6 Personal Protective Equipment

3.7 PAT Testing

3.8 Equipment Inspections & Records

3.9 Welfare

3.10 Accident Reporting & Investigation

3.11 Environmental incident / Accident Impact Investigation

3.12 Transport & Company Vehicle Safety

3.13 Machinery Operation

3.14 Machinery & Equipment Maintenance

3.15 First Aid Arrangements

3.16 Communication with workers

3.17 Health & Safety Training

3.18 Fire Safety

3.19 Young Workers

3.20 Display Screen Equipment (DSE)

3.21 COSHH Assessments

3.22 Noise

3.23 Manual Handling Assessments

3.24 Method Statements (Safe Operating Procedures)

3.25 Working at Height

3.26 Serious or Imminent Danger

3.27 Risk Assessments

3.28 Contractors & Subcontractors

3.29 Construction Design Management Regulations

3.30 Waste Management & Environmental Protection

3.31 Alcohol and Controlled Drugs

3.32 Health Surveillance

3.33 Purchase Policy

3.34 Pollution Prevention

1. **General Statement of Intent**

E.J Shanley & Son (Trowbridge) Ltd is committed to ensuring the safety of its employees, customers, members of the public and anyone else who are affected by our operations.

The company commits to operating in accordance with the Health and Safety at Work (etc) Act 1974, The Management of Health & Safety Regulations 1999 and all other applicable regulations and codes of practice, so far as is reasonably practicable.

The management will ensure that significant risks are assessed and suitable and sufficient measures are adopted to allow each employee/contractor to carry out his/her duties safely and without risk to health. Suitable equipment will be provided, maintained in a safe condition and safe systems of work will be devised.

The company shall strive to achieve continuous improvement in Health & Safety performance.

E.J Shanley & Son (Trowbridge) Ltd Management will provide all necessary resources including time to ensure that all Health and Safety matters are adequately funded. This includes training, personal protective equipment, adequate equipment/tools, maintenance for this equipment, external advice where necessary and any other resource necessary to ensure the Health and Safety of our staff.

Each employee/contractor will be made aware of his/her responsibility for his/her own health and safety and that of others. All employees/contractors will be given the opportunity to consult with the management on matters relating to Health & Safety or to appoint a representative to do so.

Where necessary the company will arrange or provide suitable training for both management and operatives, in particular where new work practices or equipment are introduced.

The company will seek external advice as necessary to keep its health & safety policy, working practices and equipment up to date and in accordance with current legislation.

Ultimate responsibility in all areas of safety rests with the Managing Director. This duty is of no less importance than any of the responsibilities attached to that position.

Reviews of Health and Safety Policy will be made annually no later than 1 year after the date on this policy. The monitoring of all issues relating to this policy is the responsibility of the Managing Director.

Signed:

Terry Shanley

Managing Director

E.J Shanley & Son (Trowbridge) Ltd. 01.01.2019

**2.0 Roles and Responsibilities**

Organisation and Managerial Responsibilities

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

We use SLTS (SOUTH WEST) LTD for gaining help and advice with Health & safety matters where required.

The organisation of the workforce is the responsibility of Terence Shanley who holds the position of Managing Director and who is responsible for ensuring that the companies Health & Safety Policy and associated procedures are implemented by all site operatives.

Day to day management of the company’s operations is the responsibility of Paul Shanley, who may be supported by site managers, each responsible for one site or customer premises. Depending on the size and nature of the site, one or more supervisors may support the responsible person, for the direct supervision of the company operatives.

Employee/Contractor Responsibilities:

Each employee/contractor has a statutory duty to take reasonable care in relation to his/her own health & safety, and the health and safety of any other person who may be affected by his/her acts or omissions.

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

To take reasonable care for the Health & Safety of themselves and others, who may be affected by their acts or omissions at work

To co-operate with the employer to ensure compliance with all the company Health & Safety policies and procedures

To refrain from intentional or reckless interference with equipment and/or systems provided in the interest of Health, Safety and the Environment

To co-operate with management when required on such things as accident prevention and all procedures with regard to Health, Safety and the Environment as set out in the Health & Safety at Work etc. Act 1974 and the Environmental Protection Act 1990 and all associated Regulations and ACOPs

To maintain good standards of housekeeping in our premises

To report any accident or incident including near-misses (whether or not personal injury results) to the office

To report any defects in equipment without delay to the company’s management team and not to attempt repairs which they have not been authorised and specifically trained to undertake

To ensure that no potentially hazardous item, substance, or machine is brought on to site or used without the prior knowledge and authority of the company management team.

To use and if applicable wear any item of Personal Protective Equipment. It is a requirement of law that any equipment supplied for safety must be used, and when not in use it is properly cleaned, stored and maintained.

To undergo any Health, Safety, Environmental and operational training deemed necessary by the company

Staff Consultation:

If an employee/contractor becomes aware of any potential breaches of health & safety law, or unsafe working practices he/she must notify the Managing Director Terry Shanley or Director Paul Shanley.

If an employee/contractor feels that health & safety procedures may be improved, for example by use of alternative equipment, he/she will be encouraged to discuss any suggestions with the management.

Specific Safety Functions and Named Responsibilities;

Terry Shanley – Managing Director - All aspects of health and safety

Paul Shanley – Director - All aspects of health and safety

Simon Long - Health and Safety Advisor -All aspects of Health and Safety

**3.0 Arrangements**

This section outlines E.J Shanley & Son (Trowbridge) Ltd. Arrangements and policies for managing and dealing with our activities and working procedures

**3.1 Safety Audits and Monitoring**

At regular intervals, the Managing Director or his nominated representative will carry out a health & safety audit on one or more working activities, selected at random. The audit will consider the effectiveness of the welfare facilities; emergency procedures, safe methods of work etc identified at the outset and will identify any corrective action required. Where the Managing Director or his nominated representative considers it necessary in order to maintain the desired level of health & safety, they may seek the assistance of an external Health & Safety Advisor in carrying out audits and identifying corrective actions.

**3.2 Guidance**

The company commits to operating to the very highest standards of Health, Safety and Quality and will therefore carry out its operations in accordance with best practice as advised by the Health & Safety Executive and also various trade bodies and associations, this best practice will be reviewed on an annual basis and adopted annually or when evidence that significant improvements can be made by adopting sooner. Guidance documents are kept at head office and will be made available to staff and other interested parties.

**3.3 Hand Arm Vibration Syndrome (HAVS)**

Anyone who regularly and frequently is exposed to high levels of vibration can suffer permanent injury. The Waste industry has high incidence of vibration white finger (VWF) injury which is one of the more common forms of HAV.

The company will ensure that staff are not subjected to excessive vibration through power tools etc. The company will endeavour to source low vibration tools and limit exposure to such tools the company will also provide adequate information instruction and training to its staff and contractors on the risks of HAVS

**3.4 Health & Safety Records**

The Managing Director will keep all records, in written form indicated in the various appendices. Such records will include:

• Equipment Inspections

• COSHH Assessments

• Generic Risk Assessments

• Staff Training and Induction Records

In addition to the above general records, the following contract specific records will be maintained for each major contract.

• Contract Start-up information

• Specific Risk assessment

• Method Statements and Safe systems of work.

• Accident Record Book

**3.5 Asbestos**

Asbestos is recognised as being an extremely hazardous substance and as such must be treated with the utmost care. When working on site staff and contractors will assume any suspicious material is asbestos unless there is conclusive evidence to the contrary. No drilling, breaking or cutting shall be carried out to any material suspected of containing asbestos fibres. Any suspicious material shall be reported to the site or building manager immediately. A Management Survey should always be made available. Its purpose is to locate, as far as reasonably practicable, the presence and extent of any suspect Asbestos Containing Materials (ACMs) in the building which could be damaged or disturbed during normal occupancy, including foreseeable maintenance and installation, and to assess their condition prior to starting work. Refurbishment and demolition surveys should be made available where refurbishment work or other work involving disturbing the fabric of the building is carried out. E.J Shanley & Son (Trowbridge) Ltd policy is that we will not generally work on asbestos products. Under limited circumstances and when authorised, E.J Shanley & Son (Trowbridge) Ltd employees with an appropriate current training certificate will be allowed to work on non-licensed asbestos products as prescribed by the HSE, this type of work will be risk assessed separately from other tasks. Notifiable non-licensed work (NNLW) must be notified to the HSE before commencement of work. All employees must sign a copy of the RAMS when working with asbestos. E.J Shanley & Son (Trowbridge) Ltd will record all projects involving NNLW and keep records of employee health surveillance as applicable (every 3 years for NNLW).

**3.6 Personal Protective Equipment**

Personal Protective Equipment (PPE) will be considered as a last resort in our control strategy when all other control strategies are inappropriate (PPE) will be provided by the company and the relevant PPE must be worn at all times whilst carrying out work. Details of the correct PPE will be made available to employees, no employee/contractor will be permitted to start work without the correct PPE and the necessary information, instruction and training to enable him to utilise the equipment correctly and without risks to safety and health. It will be the responsibility of Paul Shanley to monitor the wearing of PPE on sites under their control, persons found to be persistently breaching PPE rules will be subject to disciplinary procedures including ejection from site.

**3.7 Portable Appliance Testing (PAT)**

All portable electrical appliances will be tested in accordance with the regulations, at the recommended intervals, 'as may be necessary to prevent danger'. It will be the responsibility of the site manager to ensure that all equipment provided is suitable for the task, including any provided by a Customer.

**3.8 Equipment Inspections & Records**

Each employee/contractor must carry out a daily inspection of any equipment prior to its use, and must immediately report any defect, or suspected defect to The Management Team. The Management Team or his authorised representative will carry out periodic inspections of all company equipment, ladders, PPE, tools, etc and will keep a record of such inspections. For the purposes of record keeping, each item of equipment shall have its own unique reference, which shall be clearly marked on it. Markings must be maintained so that they are clearly discernible always.

Where an inspection reveals a defect, it will be the responsibility of The Management Team to ensure that the equipment is not used until a suitable repair has been affected. If the equipment is beyond repair it must be discarded, whether a suitable replacement is available and any work relying on the use of such equipment must be suspended until a suitable replacement is available.

**3.9 Welfare - Workplace (Health, Safety and Welfare) Regulations 1992**

All work areas will be assessed as required by legislation and will be made for suitable and sufficient breaks, drinking water, rest areas, canteen facilities and washing facilities.

* Provision will be made for shelter, storage and the drying of clothing and work wear
* Heating, lighting, ventilation and workplace noise will be assessed and additional resources identified in the assessment will be provided
* Safe access and egress will be maintained

The workplace will be assessed in terms of travel routes and the potential for injury from falls or falling objects and a clean, safe working environment will be a prerequisite on all sites. Disability and maternity access and egress will be assessed, as part of the policy of continually improving the working conditions for our employees.

**3.10 Accident Reporting & Investigation**

All employees/contractors must report any near miss, accident or injury to the Head Office. Details of all accidents will be entered into the company's accident record book.

It will be the responsibility of the Managing Director or his nominated representative to notify the Health & Safety Executive in respect of any accident or occurrence for which notification is required by the Reporting of Injuries Diseases and Dangerous Occurrences Regulations (RIDDOR).

Any accident resulting in more than minor injuries, or incident which might have resulted in severe injury, will be investigated by the Managing Director or his nominated representative. Depending upon the circumstances of the accident, the Managing Director or his nominated representative may seek the assistance of an external Health & Safety Advisor, both in the investigation and the formulation of preventative procedures to avoid repetition.

**3.11 Environmental incident & Accident Impact Investigation**

E.J Shanley & Son (Trowbridge) Ltd has a legal duty to report environmental incidents and this will be conducted by Andrew Shanley who is the Certificate of Training Competence holder (COTC) and all incident report forms recorded for the Environment Agency or Local Environmental Health Officer as required.

Investigation will be carried out by senior managers in order to support the policy and improve the company’s Health, Safety and Environmental performance. A report will be made, highlighting any areas of concern, actions required, time frame and persons responsible for the action. This information will then be used to prevent similar occurrences.

Monitoring and auditing will be undertaken in order to evaluate the effectiveness and efficiency of the policy, and these will be utilised to further the policy and its arrangements.

The company has established key performance indicators in order to measure improvement in health, safety and environmental performance, these include statistical analysis of:

* Near miss reports
* Accident reports
* Accident frequency
* Lost time accidents
* Sickness and absenteeism
* Accident severity
* Occupational health incidents
* Environmental incidents

Regular checks will be made on a monthly and quarterly basis with an annual audit of relevant areas completed by E.J Shanley & Son (Trowbridge) Ltd senior management. These will be evaluated and any necessary procedural, policy or behavioural changes will be implemented.

**3.12 Transport & Company Vehicle Safety**

It is the policy of the company to only employ drivers who are competent.

Driver approval and competence

A person may only operate company vehicles if he or she;

1. Has held a full UK license for a minimum of 2 years

2. Has not been disqualified from driving for drink and/or drug offences in the last 2 years nor has any prosecution pending

3. Holds the correct license for the type of vehicle being operated

Drivers must inform the company of any circumstances that may lead a driver to being unfit for driving duties.

Drivers must inform the office immediately they become aware of any pending prosecution for any driving offence.

All drivers will be asked to present their licenses to the office every 6 months these will be checked and returned.

All drivers must ensure their Drivers Digital Tachographs are downloaded in-line with company policy every 7 days

**3.13 Machinery Operation**

All employees/contractors who are required to operate machinery will have the appropriate training and license and will be authorised by Managing Director or the company’s nominated representative to operate such machinery. It is company policy to take severe disciplinary action against any person found to be operating machinery without the necessary competence.

**3.14 Workplace Machinery & Equipment Maintenance**

All workplace machinery and equipment shall be suitable and fit for purpose and will be guarded against hazards such as entanglement, crushing, cutting and shearing. All workplace machinery & equipment shall be subject to regular inspection by Mark Gumm Site Engineer, who will withdraw damaged or unsuitable machinery or equipment from service immediately. All machinery shall also be subject to maintenance and service as per the manufacturers instruction and maintenance schedule OR at least annually

**3.15 First Aid Arrangements**

The Managing Director or his nominated representative will ensure that as a minimum the organisation has appointed persons for first aid. Cymberlee Pritchard and Natalie Stevens will be responsible for maintaining the first aid kit and taking charge after an accident, this includes calling for a person qualified in first aid or ambulance if necessary. Where visits are carried out to other premises, the person responsible for Health & Safety will ascertain the first aid procedures to be followed, and details will be provided to all organisation employees/contractors required to work in or on such premises.

**3.16 Communication with workers**

The company uses a variety of methods to communicate information with employees and sub-contractors. Informal meetings are held to discuss any issue, including safety. We will also pass information to employees with pay slips as required. A notice board in the head office is also kept up to date.

Communication with employees whose first language is not English will be carried out using one or more of the following methods;

• Ensure adequate time to consult with employees where language and/or literacy may be issues so they can absorb the information and respond to you.

• Use an interpreter; this may be a trained work colleague.

• Get information translated and check that this has been done clearly and accurately by testing it with native speakers.

• Use pictorial information and internationally understood pictorial signs where appropriate

• Where information must be in English, use clear and simple materials, and allow more time to communicate issues.

**3.17 Health & Safety Training**

The firm will provide as much training and re-training as is necessary to ensure, so far as is reasonably practicable, the health and safety of all staff in the firm. During staff induction and upon any job transfer, safety training will be provided to ensure that the staff are trained in Health & Safety matters to a level appropriate to their responsibilities.

Induction Training

Every new employee will receive a safety induction on day one of his/her employment. The training will consist of fire safety, manual handling, and display screen equipment use (where necessary), environmental and general safety. New employees will also be given instruction and safety training on the equipment they will be required to use whilst discharging their duties. A training record will be kept and maintained. Copies of training records are available upon request.

**3.18 Fire Safety**

It is the responsibility of The Management Team to ensure that all fire safety procedures implemented in the company’s buildings are communicated to staff. Only trained and authorised staff can carry out any hot works and ensure they have the appropriate fire extinguisher to hand. 1-hour fire watch will be maintained after any hot work.

Fire risk assessments will be carried out in all areas occupied by the Company, the risk assessments will consider sources of ignition, sources of fuel and any extra sources of oxygen over and above what is present in the air. The assessment will evaluate the risk of a fire starting and the effect of the fire on people, fire escape routes and refuges, fire containment measures, fire evacuations and fire drill training. The assessment will indicate control measures to remove or reduce the risk of fire starting and will include the maintaining and inspecting of fire detection and fire suppression systems. Testing sources of ignition e.g. electrical equipment and distribution boards will be carried out at suitable intervals. Storage of fuel sources will be inspected and monitored as part of the regular health and safety inspection regime. The significant findings of the assessment will be communicated to the relevant persons together with the necessary instruction and training.

Means of Escape:

In the event of fire occurring, it is vital that staff and other persons are able to evacuate the premises.

All existing doors through which a person may have to pass to get out of the premises must be capable of being easily and immediately opened from the inside. Staff will not block or otherwise obstruct exits provided for emergency evacuation.

Access routes must always be maintained unobstructed to exit doors (internal and final exits) sufficient to allow easy access by the number of persons likely to use those routes, (750mm minimum) and employees must observe any line markers to indicate areas which must be kept clear.

Stairways in buildings must be free from any risk of fire or spread of fire e.g. unauthorised portable heater, combustible material etc.

Under no circumstances should fire doors be wedged open unless they are retained by automatic magnetic release systems or similar which are connected to the fire alarm system.

Smoking:

In line with current legislation smoking is not allowed in company vehicles or any part of the company’s premises except for the designated smoking area.

Housekeeping:

Good housekeeping is most important. Waste or packing materials should not be allowed to accumulate in any building. No combustible materials should be kept in rooms and stairwells should be kept clear of combustible materials at all times.

**3.19 Young Workers**

Risk Assessments must be carried out in compliance with The Management of Health & Safety at Work Regulations 1999 and the Health & Safety (Young Persons) Regulations 1997 In line with the Health & Safety (Young Persons) Regulations 1997, young persons are defined as those full or part-time employees under the age of 18 years. This includes young persons on job experience working within the firm.

There are also special provisions for young people in the Working Time Regulations 1998 concerning limits of hours of work, rest from work and annual holidays.

There are particular definitions of people by age in Health & Safety Law: A young person is anyone under 18 years of age

Young workers are seen as being particularly at risk because of their possible lack of awareness of existing or potential risks, immaturity and inexperience. The responsible person will therefore:

• Assess risks to young workers

• Consider their inexperience, lack of awareness and immaturity

• Prohibit certain activities where higher risks are identified

• Not allow the young person to operate any machinery or equipment without proper supervision and training

• Provide training to ensure competence before allowing any unsupervised activity to be undertaken

• Provide suitable supervision at all times

• Not employ any person under the age of 14 years for any paid or non-paid employment

**3.20 Display Screen Equipment (DSE)**

Working with Display Screen Equipment is recognised as being a major cause of injury and ill health, the company will carry out risk assessments and provide information instruction and training to its entire DSE user staff. Employees must carry out the recommendations of the risk assessment and must report instances of injury or ill health suspected of being caused by DSE work to the person responsible for Health & Safety at their earliest convenience.

**3.21 Control of Substances Hazardous to Health Assessments (COSHH)**

For all materials or substances utilised which may be hazardous to health, a formal COSHH Assessment will be carried out by the Managing Director or his nominated representative. A register of hazardous substances shall be kept at the head office along with all relevant Manufacturers Safety Data Sheets. Significant findings of the assessments will be communicated to the relevant operatives, together with the necessary MSDS sheets and instructions for use.

**3.22 Noise**

Regular exposure to high noise can cause deafness and tinnitus. Noise assessments will be carried out whenever it is suspected that noise levels may be above 80db(a), and hearing protection will be provided for all operatives. Where noise levels are at 85db (a) or above the company will take measures to reduce the exposure of noise to its employees by means other than hearing protection, the wearing of hearing protection shall also be enforced.

**3.23 Manual Handling Assessments**

The Managing Director or his nominated representative will carry out specific manual handling assessments for any necessary operation which has been highlighted as requiring a detailed assessment by the general risk assessment. Manual handling assessments will consider the load to be handled, e.g. tools, equipment etc, its size and weight, the individual, the task and the environment in which the task takes place. The assessment will also consider the possibility of utilising mechanical means to minimise the risks arising from manual handling.

**3.24 Method Statements (Safe Operating Procedures)**

Work Instructions (Safe Operating Procedures) will be developed for all the company’s operations, information from the risk assessments will be used to formulate these documents which will be used in training and given to members of staff, the work instructions will be reviewed and updated either periodically or when something significant changes.

**3.25 Working at Height**

It is the policy of the company to comply with the Work at Height Regulations 2005. Work at height will be avoided wherever possible, where work at height cannot be avoided; E.J Shanley & Son (Trowbridge) Ltd Management or their designated representative will responsible for carrying out a risk assessment and selecting appropriate work equipment to access height and ensuring the appropriate safety measures to prevent falls are implemented.

Only trained and competent staff will be allowed to work at height and will be closely supervised as required by the Work at Height Regulations 2005.

Where the risk of a fall cannot be eliminated the company will put in place measures and equipment to minimise the distance and consequences of a fall should one occur

**3.26 Serious or Imminent Danger**

These procedures are in line with Regulation 8 of the Management of Health & Safety at Work Regulations 1999.

It is a policy of the company that no employee or sub-contractor will be made to work in dangerous conditions without due regard to health and safety and all employees should be aware that there are regulations and procedures regarding serious or imminent danger.

Managers, supervisors and employees are reminded that they must not under any circumstances undertake work or instruct others to undertake work where there is a risk of imminent danger without the correct levels of personal protective equipment, training and safety procedures being in place.

The Company authorises any employee to remove himself/herself to a relative place of safety when he/she has reason to believe he/she is at serious risk or in imminent danger. Work will not resume in that area until the problem has been neutralised.

Some emergency events can occur and develop rapidly, thus requiring employees to act without waiting for further guidance, for example, in a fire. Employees must, on arrival at new sites, make themselves familiar with the emergency procedures, escape routes and location of firefighting equipment etc prior to starting work.

Under no circumstances will work activities take priority over safety considerations.

**3.27 Risk Assessments**

The Managing Director or his nominated representative will prepare a generic risk assessment covering the common risks encountered in the company’s normal business. If necessary, external assistance will be sought to carry out the generic risk assessments. The significant findings of the risk assessments will be relayed to all staff.

The Managing Director or his nominated representative will carry out site specific risk assessment for new site which the company's employees/contractors are obliged to work. Such assessments will consider the health and safety of employee/contractors and the public on site. In particular the company is aware of the number of serious injuries from the incidence of Slips, Trips and Falls. The Managing Director therefore will pay particular attention to eliminating these hazards from each site.

**3.28 Contractors & Sub-Contractors**

All contractors and sub-contractors who are working for and on behalf of E.J Shanley & Son (Trowbridge) Ltd will comply with the company’s

1. Health & Safety Policy.

2. Emergency procedures.

3. Hazard/accident reporting procedures.

All accidents and near misses need to be reported to the Managing Director or his nominated representative companies and recorded in the Accident Book located in main office.

The company's health and safety policy can be found on company notice boards which are situated in the office.

All contractors must complete the contractor’s competence form before commencing work. All working activities carried out by approved contractors on behalf of E.J Shanley & Son (Trowbridge) Ltd will be subject to ongoing auditing to ensure compliance with E.J Shanley & Son (Trowbridge) Ltd Health, Safety and Environmental policies

**3.29 Construction Design Management Regulations (CDM)**

E.J Shanley & Son (Trowbridge) Ltd will co-operate and co-ordinate activates with other contractors and will communicate information with all involved in the site construction activities. The company will check that there is adequate protection for the public and site workers, including monitoring and reviewing safety arrangements. We will also pass on key information to the construction teams where they are to design and construct something that is safe to build, safe to use and safe to maintain. The CDM Regulations apply to most common building, civil engineering and engineering construction work. The CDM co-ordinator must notify HSE of the site if the construction work is expected to either: last longer than 30 days; or involve more than 500-person days of construction work; HSE should be notified in writing before construction work starts using form F10.

**3.30 Environmental Protection**

E.J Shanley & Son (Trowbridge) Ltd has a policy to comply with the Environmental Protection Act 1990, other associated statutory legislation and Approved Codes of Practice (ACOP). This applies to all those who are employed within the company or who are protected by its undertakings. Employees are asked to co-operate in the operation of this policy and make a positive contribution to environmental protection by making themselves aware of the firm's environmental policy and complying with the control measures in place. This includes comply with the requirements of Site Waste Management Plans where it relates to the works under our control. The policy is on display on the Company Main H&S notice board and is also available to interested parties on request.

With regard to all current waste management legislation, the company will supply Waste Transfer Notes (Including special and Hazardous), Waste Management Licence details and Registered Waste carrier details.

E.J Shanley & Son (Trowbridge) Ltd are committed to a strategy of recovery and recycling in accordance with the hierarchies of waste in order to reduce the environmental impact of our undertaking. We will provide such information as needed to ensure our stakeholders have a ‘cradle to grave view’ with regard to waste management and will supply a detailed waste management policy, where requested.

**3.31 Alcohol and Controlled Drugs**

It is categorically forbidden for employees to enter sites or places of work, to drive a vehicle, use or operate plant and equipment, or to assist or supervise in its use, whether on or off company business, in an unfit state due to the influence of alcohol or illegal drugs and other substances, such as glue. Disciplinary action will be taken if you are caught in the possession of illegal drugs on Company or Client property or in Company vehicles. Employees taking medicines or prescribed drugs under the direction of their G.P, Dentist, or Hospital Doctor that may affect their ability to carry out their work duties have a duty of care responsibility and must notify their immediate Manager.

**3.32 Health Surveillance**

All employees of E.J Shanley & Son (Trowbridge) Ltd are encouraged to carry out and record weekly personal health checks. Any problems reported will be dealt with in a personal and confidential manner by senior management. Should E.J Shanley & Son (Trowbridge) Ltd have any concerns regarding the wellbeing of any employee they may request a referral to a professional occupational health provider and or on request of an employee in matters relating to work related ill health issues E.J Shanley & Son (Trowbridge) Ltd will pay for conducting relevant medical surveillance were appropriate.

**3.33 Purchase Policy**

The Health and Safety at Work Act 1974 imposes duties upon E.J Shanley & Son (Trowbridge) Ltd and those providing goods and services to the company. Health & Safety legislation affects purchasing decisions including the use of sub-contractors or out-sourced activities. This also includes the purchase of new or hired equipment, maintenance services and goods; but is not limited to such legislation as The Supply of Machinery (Safety) Regulations (amended in 2011), The Provision and Use of Work Equipment Regulations (PUWER) 1998 and The Control of Substances Hazardous to Health Regulations.

When purchasing or hiring machinery/equipment E.J Shanley & Son (Trowbridge) Ltd will make sure it has all the relevant information and instructions on how it works, including the appropriate safety features and certifications of compliance. All suppliers of services will be competent and trained. All users of the equipment will receive suitable training and instruction before being allowed to use equipment. The equipment must be safe, meet all relevant UK and EU supply Directives and be CE marked; it will be maintained in line with current legal requirements, manufactures/supplier’s guidance or ACOPS ruling at the time of use.

**3.34 Pollution Prevention**

E.J Shanley & Son (Trowbridge) Ltd is committed to controlling pollution on its sites, customer sites and the surrounding neighbourhood.

Potential sources of pollution such as fuel, chemicals, gases and waste, shall be strictly controlled and will be included in the Health and Safety inspection auditing.

Precautions and an emergency response plan, in the event of accidental release, will be in place on every site and appropriate awareness training will be given.