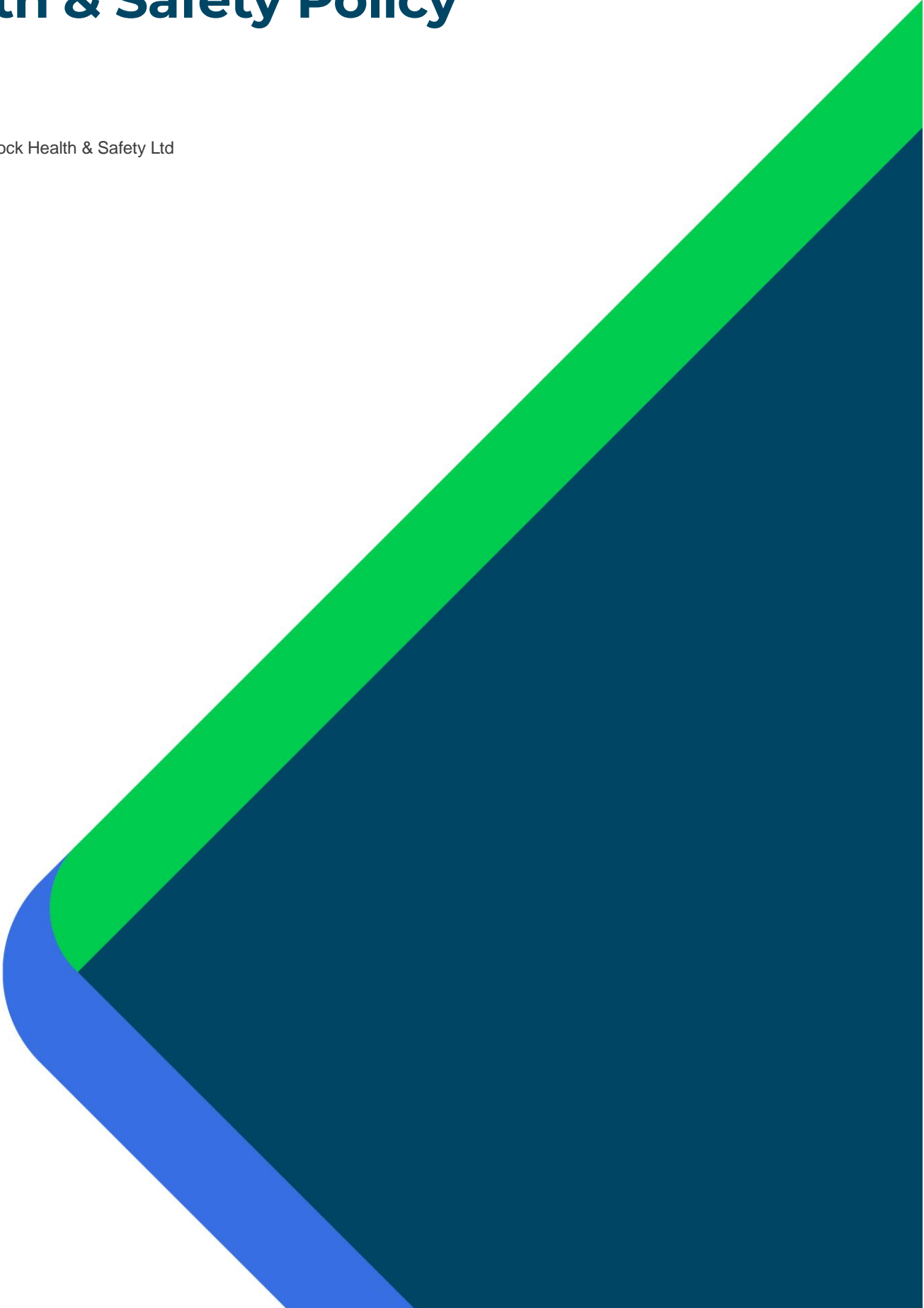


# Health & Safety Policy

Issued By: Wenlock Health & Safety Ltd



# HEALTH AND SAFETY POLICY AMENDMENT SHEET

## Record of Amendments

| Issue Number | Date           | Index Reference | Brief Description of Amendment   |
|--------------|----------------|-----------------|--|
| 1            | April 2016     |                 | First Issue  |
| 2            | September 2016 |                 | Reconomy Branding  |
| 3            | January 2017   |                 | Annual Review  |
| 4            | January 2018   |                 | Annual Review  |
| 5            | January 2019   |                 | Annual Review  |
| 6            | February 2019  |                 | Wenlock Health & Safety – Appointed New Health & Safety Company. New Policy put in place |
| 7            | February 2020  |                 | Wenlock Health & Safety - Annual Review  |
| 8            | February 2021  |                 | Wenlock Health & Safety - Annual Review  |
| 9            | February 2022  |                 | Wenlock Health & Safety - Annual Review  |
|              |                |                 |  |
|              |                |                 |  |

# HEALTH & SAFETY POLICY

## General Statement of Policy

Reconomy (The Company) recognises its health and safety duties under the Health and Safety at Work Act 1974, the Management of Health & Safety at Work Regulations 1999 and accompanying protective legislation, and the Chief Executive Officer, **Mr P Cox**, recognises that he has a responsibility to ensure that all reasonable precautions are taken to provide and maintain working conditions which are safe, healthy and comply with all statutory requirements and codes of practice.

Reconomy, so far as is reasonably practicable, proposes to pay particular attention to:

- The provision and maintenance of a safe place of work, a safe system of work, safe appliances for work, and a safe and healthy working environment
- The provision of such information and instruction as may be necessary to ensure the health and safety of its employees and others, and the promotion of awareness and understanding of health and safety throughout the workforce.
- Ensuring the safety and absence of health risks in connection with use, handling, storage and transport of all articles, substances and equipment
- Making regular assessments of risks to employees
- Taking appropriate preventative/protective measures as identified by risk assessment
- Appointing Wenlock Health and Safety Ltd to secure compliance with statutory duties.

In order that the Company can achieve those objectives, it is important that employees recognise their duty, whilst at work, to take reasonable care for the health and safety of themselves and of other persons. Employees should also co-operate fully with the Company or anyone else concerned, to ensure that their obligations are performed or complied with.

Reconomy will ensure adequate resources both time and money are made available to the necessary people to ensure that the items listed above are implemented and all employees are provided with the necessary instruction, information, training and supervision to enable them to carry out their work without risk to themselves or others. An annual review of the Health and Safety Policy will also be undertaken to ensure it is relevant to the work being undertaken by the company and all legislation quoted is up to date, where necessary the policy will be developed and expanded.

Reconomy is also committed to the continuous development and improvement of the company's health and safety management system. The company will ensure that the health, safety & welfare of any employee or subcontractor is not compromised for financial or commercial gain.

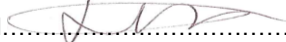
All employees of Reconomy agree, as a term of their contract of employment, to comply with their individual duties under the Health and Safety at Work Act 1974, and the Management of Health and Safety Regulations 1999 and other legislation, and to generally co-operate with the Company so as to enable it to carry out its duties towards them.

The attention of all employees is drawn to the attached safety rules and procedures, and employees should recognise that failure to comply with their health and safety duties and obligations can lead to dismissal from employment. In the case of serious breaches, such dismissal may be instant without prior warning.

This policy has been prepared in furtherance of section 2(3) of the Health and Safety at Work Act 1974 and binds all staff. We request that our customers and visitors respect this policy, a copy of which can be obtained on demand.

Signed.....  
Print Name: Paul Cox

Position in Company: Chief Executive Officer  
For Reconomy

Signed.....  
Dated.....4 February 2022

For Wenlock Health & Safety Ltd  
Expiry Date.....3 February 2023

# HEALTH & SAFETY POLICY

## Introduction

This document details the Company's general health and safety arrangements and strategy, and the procedures by which good and consistent standards are maintained.

The Company Health & Safety Policy is intended to give an overview of those arrangements which apply to the Company in general. Specific arrangements, procedures and safe systems for ensuring health and safety throughout Company activities are detailed within the Company Health & Safety Manual, and operation or task-specific risk assessments and procedures.

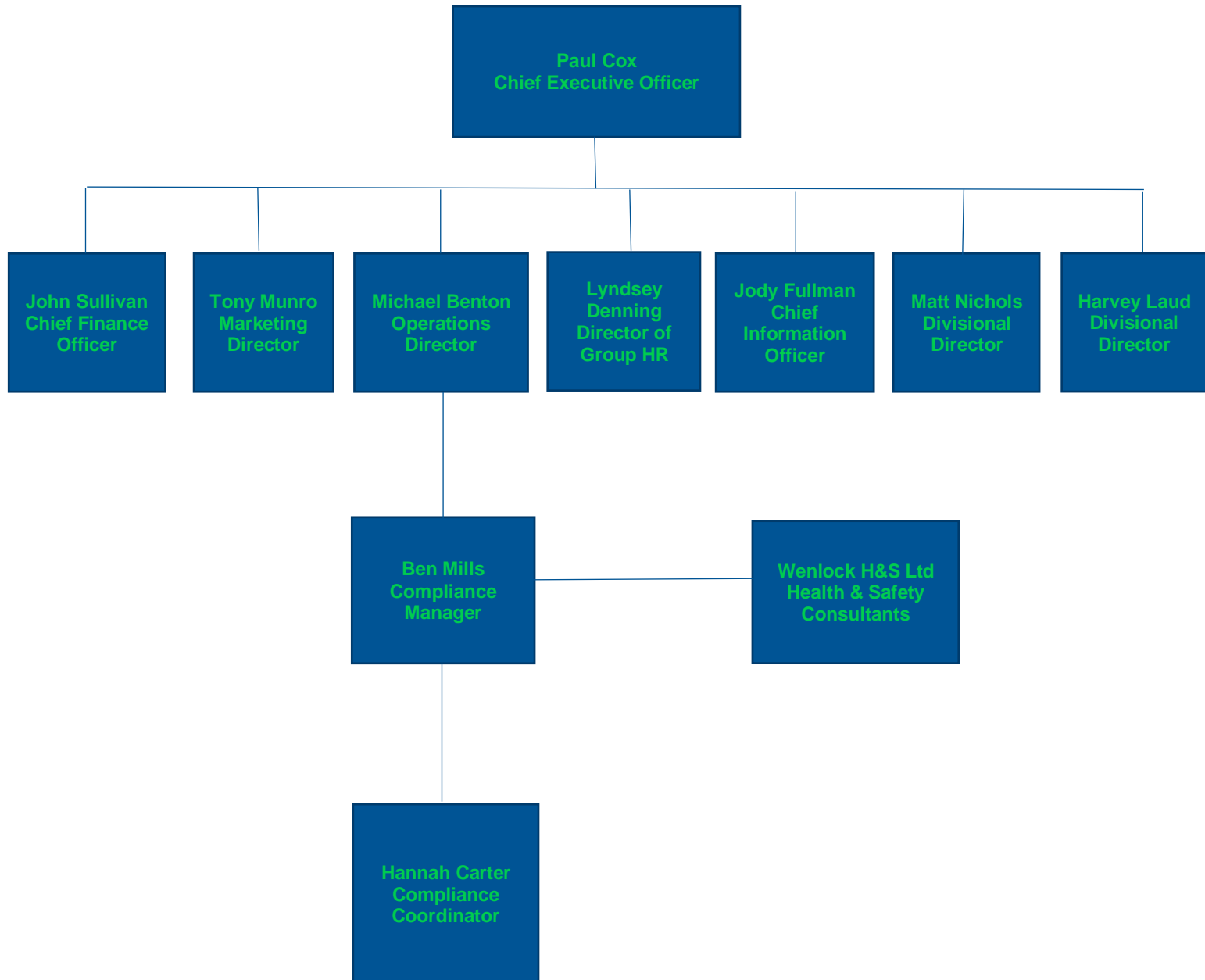
## Health & Safety Personnel

Within Reconomy, ultimate responsibility for health and safety rests with Company Chief Executive **Mr Paul Cox** (*hereafter referred to as the Health & Safety Director*). To assist the Health and Safety Director, **Mr Ben Mills** (Compliance Manager) is tasked with the day – day Management of Health and Safety (*hereafter referred to as the Health & Safety Manager*)

However, to aid compliance with its duties under the Management of Health & Safety at Work Regulations 1999, the Company retains the services of Health & Safety Consultants, Wenlock Health & Safety Ltd. of Telford, Shropshire to advise and assist with all aspects of health and safety management.

*An organisation chart is enclosed overleaf*

# HEALTH & SAFETY ORGANISATIONAL CHART



## HEALTH & SAFETY MANAGEMENT AND ARRANGEMENTS

The Health & Safety Director's responsibilities include the provision of sufficient resources to ensure that all necessary systems and procedures can be established and that employees can undertake their activities with minimum of risk to life and limb; the monitoring and review of all health & safety systems and training; the management of the Company's responsibilities under CDM, the Management Regulations, and all other applicable regulations and best practice; liaison with the Health & Safety Consultant; and all other matters relating to the management of the Company's health and safety strategy.

The Health & Safety Consultant's responsibilities include (but are not limited to) the review of the Policy and Health & Safety Manual; assisting with CDM information, risk assessments and other health and safety-related documentation as required; providing advice and guidance; ensuring the Company is kept fully aware of current legislation and best practice; site safety auditing and inspection; accident investigation and other associated services.

### Company Health & Safety Policy

It is the responsibility of management (i.e. the Health & Safety Director, Company Directors, Corporate Account Managers) to ensure that the principles of this Company Health & Safety Policy are upheld on all contracts and throughout the Company's operations.

It is the responsibility of all employees (whether directly or indirectly employed), under the Health & Safety at Work, etc., Act 1974, to abide by the principles laid down in this Policy, and to take all reasonable precautions to safeguard the health of themselves, their colleagues, and all others affected by their actions.

The Policy is reviewed annually by the Health & Safety Consultants and the Health & Safety Manager, or is amended between reviews if made necessary by changing legislation or Company circumstances.

Copies of the Policy (and any amendments) are issued to all personnel.

### Company Health & Safety Manual

The Company Health & Safety Manual contains details of the risks and control measures associated with all normal site and office circumstances, and all applicable legislation or standard practice.

The Manual is reviewed annually by the Health & Safety Consultants and the Health & Safety Manager or is amended between reviews if made necessary by changing legislation or Company circumstances.

Copies of the Health & Safety Manual (and any amendments) are issued to management (i.e. the Health & Safety Director, Company Directors, Corporate Account Managers). It is the responsibility of management to ensure that all employees under their control are sufficiently instructed into the contents of the Manual to be able to carry out required tasks safely and with adequate awareness of the risks involved and necessary control measures.

### Construction Works at Company Premises

As Client on any construction project (as defined by CDM) carried out at its premises, the Company will diligently undertake its full responsibilities under CDM to ensure the health, safety and welfare of all contractors, Company employees and all others affected by the works, and, where more than one contractor is involved, to engage a Principal Designer and Principal Contractor

The Health & Safety Consultants may provide, as requested, advice and guidance for individual works, and the monitoring of compliance through the works

## Risk Assessment and Information Dissemination

It is the responsibility of the Health & Safety Manager to ensure that risk assessments are undertaken, and all others such as noise, vibration and manual handling as appropriate, and to clearly disseminate the information to, and instruct accordingly, all workers (both directly and indirectly involved with those operations).

Generic risk assessments are held by the Company detailing commonplace site and office-based circumstances; these are used as reference material for site- or operation-specific assessments undertaken by either the Health & Safety Manager or Regional Accounts Managers prior to the start of the work.

## COSHH Assessment and Information Dissemination

Common substances and products have been previously assessed; generic COSHH assessments are held by the Company. For unfamiliar substances or products, data sheets are sought from the supplier and specific COSHH assessments carried out. Advice is sought from the Health & Safety Consultant as necessary.

Information from all assessments concerning the use, handling and storage of substances and products is disseminated to those on site through induction or tool-box talks, including strict instruction never to use a substances until sufficient instruction has been given, never to deface or remove a label, and to always ask if unsure.

## Control of Sub-Contractors/ Supply Chain

It is the responsibility of the Health & Safety Director to ensure that only those sub-contract companies who can demonstrate competency for the work will be considered for inclusion on the Company Approved List

Currently, entry onto the Approved List is reliant on either:

- 1) proven health & safety performance on site or
- 2) an assessment initially by questionnaire

The Health & Safety Director is responsible for ensuring that the system is monitored and effective

The Health & Safety Director is also responsible for ensuring that all Sub-contractors and Suppliers are made aware of risks and control measures as detailed within Company and site rules, and relevant site specific / depot specific risk assessments.

## Control of Indirect Employees or Contractors

In addition, it is the responsibility of the Health & Safety Manager to ensure that indirect employees/contractors engaged by the Company (all maintenance or repair engineers, window cleaners, etc) are sufficiently competent to undertake their tasks without foreseeable risk to themselves, Company employees or others affected by their operations

Appropriate verification of competence is sought; assistance is requested from the Health & Safety Consultant as necessary

## Training

The Company is committed to the principle of fully training its workforce for the types of tasks required.

It is the responsibility of the Health & Safety Director to ensure that adequate training has been carried out, and the responsibility of the Health & Safety Consultant to advise as necessary on the types and levels of training required. Specific training takes the form of either:

1. the formal course provided by a suitably qualified or accredited instructor, or
2. informal instruction given by either the Health & Safety Director and or Manager or by the Health & Safety Consultant

Training needs are continually assessed according to the current qualifications or experience of the workforce, the introduction of new equipment, and changing Company circumstances.

General health & safety induction defining Company rules is given by management at the start of employment.

Site-specific induction is then given prior to the start of each job to all workers on that depot. This induction defines site rules, workers' responsibilities, foreseeable risks and control measures.

It is the responsibility of all employees to ensure that they do not undertake tasks for which they have received insufficient or no training. Further training or instruction should be requested where necessary.

## Personal Protective Equipment

It is the responsibility of the Health & Safety Director (and thence, Regional Account Management) to ensure that sufficient and adequate personal protective clothing and equipment (PPE) is supplied according to the nature of the tasks to be undertaken, and that this equipment is suitable for use, compatible with other items of PPE and clothing, and CE marked where appropriate. It is also the responsibility of management to ensure appropriate items of PPE are worn by employees (direct or indirect) under their control.

It is the responsibility of all employees to abide by the rules laid down for that site, and wear the PPE provided in the manner intended.

It is the responsibility of management at all levels to discipline non-compliance, and to set a personal example by wearing appropriate PPE on site and/or as necessary.

It is the responsibility of all employees to store and care for their PPE in the correct manner, to regularly inspect the items for damage, and to request replacements when necessary.

## Personal Safety

Use of personal audio equipment is strictly prohibited in the workplace; When on sites/ depots, use of personal mobile phones is prohibited in the workplace unless specifically authorised by site/depot management, and then only when safe to do so.

Use of mobile phones (other than hands-free) whilst driving is prohibited; use of hands-free mobile phone equipment whilst driving is discouraged.

Smoking is banned in all workplaces, including all sites/depots unless a specific area has been designated as a 'smoking zone/shelter', and company vehicles. It is Company policy that this ban includes e-cigarettes.

It is the responsibility of the Health & Safety Director (and thence, Regional Account Management) to ensure that prohibitions and such rules are observed, and to discipline non-compliance.

## Plant, Equipment and Work Equipment

It is the responsibility of the Health & Safety Director to ensure that all plant and equipment (including Company vehicles) is kept in good working order and meeting all current health & safety requirements. The Health & Safety Director is responsible for ensuring all plant and equipment (whether owned or hired) is maintained and serviced in a pro-active manner and at the correct frequency (according to manufacturers' or hirers' instructions), and that correct records are kept.

All items are checked before use each day; more thorough inspections are recorded regularly by relevant competent individuals (usually the operator, or as authorised by the Company) in line with current legislation. Damaged or faulty items are withdrawn from use until rectified correctly.



In addition, it is the responsibility of the Health & Safety Director to ensure that all portable electrical equipment is PAT tested at an appropriate frequency (dependant upon the nature of the equipment) and full records kept.

No plant or equipment is operated by anyone who is not sufficiently trained to the correct level; it is the responsibility of management to ensure the correct training has been given and that sub-contract operators hold the necessary proof of competence.

Drivers of Company vehicles must hold a current road driving licence and demonstrate compliance with the Highway Code and highway legislation; any misdemeanors are treated wholly as the driver's (and not the Company's) responsibility.

Drivers are wholly responsible for ensuring the vehicle remains in a roadworthy and legally compliant condition.

## Asbestos

All employees are under strict instruction not to disturb any existing materials unless their contents have been established; employees are under strict instruction to contact either Head Office or the Health & Safety Consultants for guidance if in doubt.

This ruling also applies to Head Office; no employee, contractor or any other person may disturb the building structure, fabric or fixtures and fittings without proof that they comprise no asbestos-containing materials.

Where work on the premises is required, all persons involved will be required to familiarise themselves with the Asbestos Management System and sign to verify their understanding of restrictions.

Should (a) licensable disturbance or removal, or (b) significant notifiable non-licensed work be required, the Company will engage a properly licensed asbestos contractor. Contractors or internal persons carrying out minor non-licensed work will require proof of (a) recent asbestos awareness training, and (b) procedural training such as Category B UKATA or HSG210.

The Health & Safety Director is responsible for ensuring that the above procedures are strictly followed and employees disciplined for non-compliance.

## Manual Handling

Due consideration is given to the weight, size and shape of all items to be handled. Following assessment, mechanical means are used or assistance provided where necessary in line with the Manual Handling Regulations 1992 (as amended).

However, where manual handling is unavoidable, manual handling instruction is reiterated for all employees (refer to the Health & Safety Manual) and compliance monitored on site. Tasks are matched to the individual's capabilities and the site environment.

## Health & Safety Monitoring

The Health & Safety Director is responsible for ensuring that all operations are monitored for health & safety compliance and performance:

- on a day-to-day basis by site-based personnel (Health and Safety Manager and Site Liaison Officers)
- frequently by visiting management (the Regional Accounts Managers)

In addition, although risks to health (through noise, vibration, hazardous substances, etc) are deemed to be minimal due to the controlled nature of the Company's operations, the Company has access to occupational health services (through Wenlock Health & Safety Ltd) who can monitor the general health of site personnel and recommend suitable courses of action should there be any cause for concern.

## Accident Prevention and Reporting

It is the responsibility of management to provide sufficient equipment, manpower, health & safety training, etc. on each site to ensure that the work can be completed without risk to life or limb.

It is the responsibility of all employees to utilise the equipment and manpower in the manner intended and as instructed by management, and to request further when necessary.

All employees are responsible for reporting all accidents to The Health & Safety Manager and accurately recording using the Company Accident Book.

The Health & Safety Manager is responsible for reporting all serious (potentially life-threatening) incidents resulting in fatality, major injury or dangerous occurrence as defined by RIDDOR to the HSE immediately (or as soon as reasonably practicable) through the central reporting telephone number: **0345-300 9923** or, should the injuries not be serious or life-threatening, on-line: <http://www.hse.gov.uk/Riddor/report.htm> and follow the relevant link.

The Health & Safety Manager is also responsible for formally investigating all such incidents in order to submit a report to the HSE if necessary and to prevent recurrence in the future. The Health & Safety Consultant may give assistance in such cases if requested, including liaising with the HSE.

The Health & Safety Manager is responsible for reporting on-line as soon as reasonably practicable to the HSE (under RIDDOR) all over-7-day work-related absences and incapacities, diagnosed occupational diseases, hospitalisation of a member of the public and any serious public aggression.

The Health & Safety Manager is also responsible for ensuring that all over-3-day work-related absences and incapacities are properly recorded internally; these records all required by law despite notification being unnecessary.

## Provision of First-Aid

The Health & Safety Director is responsible for ensuring there is sufficient first-aid cover on each site as per the Health & Safety (First-Aid) Regulations 1981 and Approved Code of Practice as updated 2013 (L74), and that sufficient first-aid supplies are held at all places of work, including Company vehicles.

On site, unless alternative and satisfactory arrangements are made, first-aid cover and facilities are provided by the Company. The names of the nominated first-aiders (whether provided by the Company or the Client) are notified to all site personnel during site induction prior to the start of the works on that site.

At Head Office, the names of the first-aiders are displayed. The nominated first-aiders are responsible for ensuring that first-aid facilities and kits are kept well stocked, clean and easily accessible at all times.

Patients are dealt with by first-aiders in the most appropriate manner, including contacting a GP, hospital or A&E; where there is doubt about whether symptoms warrant medical attention, NHS111 may be contacted for expert advice.

## Fire

The Health & Safety Director is responsible for ensuring that a suitable fire risk assessment has been undertaken at Head Office by a competent party and adequate arrangements implemented. Specific system requirements or alterations etc. are to be determined by a dedicated fire specialist.

Fire drills are undertaken and emergency systems checked regularly; fire extinguishers are provided throughout and serviced annually by the Company.

## Emergency Procedures

Site / depot management is responsible for setting up clear procedures on site to be followed in case of emergency. These will include the most practical alarm signal, safe exit routing (taking account of changing circumstances as work progresses), assembly points, and the locations and telephone numbers of emergency services.

Lone working is avoided where practicable. If unavoidable, arrangements are made to ensure the safety of the lone worker (e.g. good communication and regular checks).

## Welfare

On site/in depots, the Health & Safety Director is responsible for ensuring that welfare is provided to both direct and indirect employees that meets current legal requirements.

Welfare facilities are kept serviceable, as reasonably clean as possible, and fit for purpose at all times. Organic matter will be cleared very regularly to prevent vermin; tools and equipment will not be stored within welfare cabins

At Head Office, the Health & Safety Director is responsible for ensuring that welfare meets the requirements of the Workplace (Health, Safety & Welfare) Regulations 1992; adequate sanitary, washing and rest facilities are made available for all staff at Head Office.

## Visitors and the General Public

Visitors to site are not allowed into the working areas unless they are:

- a) accompanied at all times, and
- b) wearing appropriate PPE.

Access to unauthorised persons is restricted by the most appropriate means during both unattended and (where necessary) working periods.

## Visits by Enforcing Officers

Should an HSE, Local Authority, Fire Authority or Environment Agency enforcing officer visit a premises, it is the responsibility of all personnel to conduct themselves in a courteous manner at all times, and demonstrate to the officer this Company's commitment to health and safety.

It is a legal requirement that all personnel fully co-operate with all enforcement inspectors; under no circumstances can **any employee** (direct or indirect):

- obstruct an officer
- refuse access to the premises, equipment or personnel
- refuse to answer questions (representation may be requested)
- use verbal abuse

Should a disagreement ensue, the matter is to be treated with courtesy at all times and referred immediately to a superior for further discussion.

## Discipline

It is the responsibility of all employees (direct or indirect) to conduct themselves in an appropriate manner as representatives of the Company and to ensure their own health and safety and that of all others affected by their actions.

It is the responsibility of management at all levels to uphold the discipline on the Company's sites and premises, and to reprimand or dismiss those employees behaving in an irresponsible or dangerous manner.

The use of alcohol and recreational drugs whilst at work is strictly prohibited, as is their use outside working hours when subsequent judgement on site may be hindered. Prescriptive or 'over the counter' drugs must be declared to management (in confidence), particularly if causing drowsiness, dizziness or loss of judgement, in order that safe tasks may be found.

## Employee Co-Operation

Full co-operation is expected of all employees, and all sub-contractors' employees on the Company's sites/ Clients sites, to assist the Company in carrying out its contracts in a safe manner.

All those on site must, under the law, comply with any reasonable instruction or request of a health and safety nature in order to assist the Company in safeguarding its employees and all others affected by its works.

Such instructions include following (and not deviating from) agreed working methods, wearing the correct PPE, and using plant and equipment in the manner intended.

Non-compliance is subject to disciplinary measures.

## Employee Consultation

In line with the Health and Safety (Consultation with Employees) Regulations 1996 and the Information and Consultation with Employees Regulations 2004, the Health & Safety Director is responsible for ensuring adequate discussion with employees under the Company's control regarding (a) any changes which may affect their health and safety, and (b) the Company's health & safety objectives, requirements and expectations, in order that the entire workforce takes 'ownership' of their own health & safety and that of others affected by their acts or omissions.

The Health & Safety Director is also responsible for ensuring that all employees can air their feelings and grievances in a sympathetic and practical manner without fear of retribution. The Health & Safety Consultant may also be contacted (in confidence) if necessary on **01952-885885**

## Working Time

The various restrictions to working periods dictated by the Working Time Regulations have been incorporated into the Company's contracts and terms of employment.

Unless circumstances are exceptional and temporary, it is not permissible for any employee to work beyond the agreed hours and, thus, for judgment and capabilities to be compromised due to tiredness.

All employees are at liberty to speak (confidentially if necessary) to the Health & Safety Director should issues related to unreasonable hours and/or tiredness become an issue.

## Data Protection

The General Data Protection Regulation (GDPR) will be complied with when dealing with personal data in respect to health and safety requirements.

When accident reporting and accident investigation take place personal details will be stored and processed only for that specific purpose and only by authorised personnel. Personal data will be kept secure at all times, will be checked for relevance, and only be kept for as long as it is required, then safely destroyed and/or deleted.

An individual's medical records and health surveillance will be stored and processed for a clearly defined purpose and only by authorised personnel. Personal data will be kept secure at all times, will be checked for relevance, kept up-to-date where necessary and only be kept for as long as it is required, then safely destroyed and/or deleted.

While complying with all Health and Safety Regulations, GDPR will be considered and abided by, but will not hinder compliance.

All employees will be informed of the Company's Data Protection Policy and relevant employee Privacy Notice regarding their own personal data, and will be given sufficient training in how their individual job roles must aid compliance.

# HEALTH & SAFETY POLICY

## Acknowledgement of Receipt

I..... (print name)

have received and understood the contents of the Company Health & Safety Policy.

I understand my duties under the Reconomy Health & Safety Policy and current health & safety law.

I also understand that I am under a legal obligation to comply with this and all other Company policies issued to me, and to request further instruction or discussion if in doubt about any aspect these or any other health & safety issue.

Signed.....

Date.....

*This form is to be returned to Head Office for archiving by Reconomy*