The Wood Recycling Industry Code of Practice

Guidance Workbook

Produced by the Wood Recyclers Association

The Wood Recyclers' Association believes the content of the Code and Workbook to be correct atthe time of writing. However, factors such as regulatory requirements are subject to change and users of the documents should check if necessary to confirm the current situation. While steps have been taken to ensure accuracy, the WRA cannot accept responsibility or be held liable by any person for any loss or damage arising out of, or in connection with this information being inaccurate, incomplete or misleading.

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Introduction

A central aim of the Wood Recycling Code of Practice is to help wood recycling companies to improve their operations and adopt sectoral best practice. This guidance workbook plays an important role in facilitating improvement by providing practical guidance to companies on how they might address key issues contained in the Code. The guidance also provides templates which can be adapted to form the basis of the documented systems.

Code publicity

The success of the Code will increase in direct proportion to the level of customer awareness. For example, the more end user groups that are aware of the Code, the more likely it is to be specified as a requirement of supply in tender documentation and the greater the competitive advantage for your company as a Code member.

Promotion of the Code to customers

Code members can play a part in this process by sending copies of the Code to existing and potential suppliers and customers. Use can also be made of the checklists in Appendices 1 and 2 of the Code. The ‘questions to ask your wood recycler/recycled wood product supplier’ can be forwarded to suppliers and customers or included in your own sales literature to illustrate the range of issues which differentiate responsible operators.

Logo

Code members are encouraged to use the Code logo. This will be available as a downloadable file which can be added to headed paper and used on publicity materials and websites.

Code of practice guidance

This section highlights the main requirements of the Code and provides suggestions as to how these requirements might be met. In addition, the Code audit checklist has been integrated into the tables, providing companies with a checklist to ensure that they meet the requirements of the Code.

Many companies will already have their own systems in place which manage the issues perfectly well. This guidance is not designed to replace existing systems but it may be possible to use specific elements to further improve that which already exists. In addition, the guidance will be of use to those companies which do not currently have documented systems for particular issues.

1 Management of suppliers of wood for recycling

Code requirement	Guidance	Audit requirement
1.1 Provision of documentation on acceptable/ non-acceptable material	Suppliers of wood for recycling must be provided with written confirmation of the types of material which will/ will not be acceptable in recycling containers. A suggested form is provided in **Appendix 1**. Some companies will need to provide a more detailed specification according to their end market use for the material	• Does company provide written confirmation of the types of material which will/will not be acceptable in recycling containers?
1.2 Provision of a written summary of the consequences of non-accept-able material	It is important that suppliers of wood for recycling are aware of the practical, procedural and financial consequences of supplying contaminated loads. Written information should be provided regarding the warnings, financial penalties and potential return of contaminated loads. This information will typically be sent out with the information on acceptable material and has been included in **Appendix 1**	• Does company provide a written summary of the consequences of non-acceptable material?
1.3 Recording and reporting system for problem loads	If loads do not match the requirements of the agreed specification, the nature of the problem should be recorded and reported to the supplier of the wood for recycling. A documented rejection policy should be in place. Sites may want to consider taking a picture of any problem loads to keep on file and forward to the material supplier, using a mobile phone camera etc	• Does company have a recording and reporting system for problem loads? • Check that a documented rejection system is in place. • Evaluate the actions/ documentation of a specific recent problem load.
1.4 Provision of carrier registration certificate to all new suppliers	Suppliers of wood for recycling should be provided with a copy of your waste carrier registration certificate where you undertake the transport from their site. Suppliers should be instructed that this document should be kept on file to help to meet their duty of care requirements. The provision of such documentation helps to demonstrate that your company is a responsible operation which takes its legal compliance issues seriously Despite being introduced around 1992, there is still much ignorance regarding the Duty of Care. A suggested covering note is included in **Appendix 2** to explain to the customer about the Duty, the actions they need to take and the information they should retain on file	• Does company provide carrier registration certificate to all new suppliers? • Evaluate information pack sent to new suppliers for carrier registration certificate and transfer note (actual or sample note).

Code requirement	Guidance	Audit requirement
1.5 Provision of transfer notes to all suppliers	The generation of transfer notes is a legal requirement. These can be for each load or on an annual basis. Again, to distinguish your company as a responsible operator, a copy of the actual annual transfer note or a standard example note should be attached to the Duty of Care explanation note (**Appendix 2**)	Does company provide transfer notes to all suppliers? • Audit two recent loads
Recommendations	As well as providing written documentation many wood recyclers will also want to visit potential new suppliers, to inspect the wood generation process and provide site-specific advice with regard to acceptable material, typical problem issues and duty of care requirements Also, have you considered running an open day for suppliers on your site to show them that it is not simply a case of collecting their residues and shipping it straight to a market? By giving suppliers an understanding of the nature of your process, they will be better able to appreciate the need for proper segregation and the removal of contaminants	

2 Management of incoming materials

Code requirement	Guidance	Audit requirement
2.1 Code members are required to comply with the requirements of the Protocol for the Verification of Wood Packaging Waste in the United Kingdom	The Protocol for the Verification of Wood Packaging Waste in the United Kingdom provides the methodology for the inspection and recording of incoming materials	Does the company have evidence of compliance with the requirements of the Protocol for the Verification of Wood Packaging Waste in the United Kingdom?

3 Environmental management

Code requirement	Guidance	Audit requirement

3.1 All participants must be working with their regulators to secure full compliance	This requirement can be met by retaining correspondence with regulators regarding licences and permits which shows that the company has worked with the regulators to achieve an acceptable level of performance
	
	In order to achieve full compliance, the company needs to have knowledge of current legal requirements and a system to identify potential future requirements. This could be achieved by maintaining a register of environmental regulations, an example of which is included in **Appendix 3**. The register might break legislation down into that relevant to air emissions, waste management, water management and land contamination
	
	For each section, details are kept of:
	• Name of piece of legislation
	• Relevance to the company
	• Internal controls to manage the item
	
	It is also necessary to have a method of updating the site with regard to forthcoming legislation. This could be through a subscription to a relevant journal, local environmental club or trade body with an updating service etc
	
	As part of the evidence that the requirements of the legislation have been thoroughly evaluated, companies should consider the use of environmental risk assessments for key issues with the potential for significant environmental impact, such as the escape of liquids, nuisance management and the control of solid waste
		• Does the site have a method of identifying current legal requirements?
		• Is compliance borne out by actions on the site visible during the tour?
		• Is there a mechanism to identify potential future legal requirements?
		• Are records kept which show that the company has worked with the regulators to achieve an acceptable level of performance, eg:
		  • Waste management site licence conditions: is the company in compliance?
		  • Are transfer notes and carrier registration details kept in respect of waste streams leaving the site such as general waste, scrap metal and liquid effluent?
		  • Nuisance issues: Does the site hold a register of complaints and is there evidence of action being taken to investigate and address complaints?

Code requirement	Guidance	Audit requirement

3.2 All participants must have an environmental policy statement to which they adhere	A policy can be defined as a statement by the organisation of its principles in relation to its overall environmental performance. The environmental policy statement should:
	• Be appropriate to the environmental impacts of the company's activities
	• Include a commitment to continual improvement and the prevention of pollution
	• Include a commitment to work with regulators to secure compliance with relevant environmental legislation and other requirements to which the organisation subscribes
	• Include a commitment to training for staff whose role could have an impact upon environmental performance; and
	• Be documented, signed by a senior manager, reviewed on a regular basis and made publicly available
	
	Guidance on writing an environmental policy template has been included in **Appendix 4** and an example policy is included in **Appendix 5**
		• Does the company have an environmental policy statement?
		• Does the company have evidence that it adheres to the content?
		• Is the policy appropriate to the environmental impacts of the company's activities?
		• Does the policy include:
		  • Commitment to continual improvement and prevention of pollution?
		  • Commitment to work with regulators to secure compliance with relevant environmental legislation and other requirements to which the organisation subscribes?
		  • A commitment to training for staff whose role could have an impact upon environmental performance? and
		• Is the policy:
		  • Signed by a senior manager?
		  • Reviewed on a regular basis?
		  • Publicly available?

Code requirement	Guidance	Audit requirement

3.3 All participants must have staff training and awareness programmes	Site environmental management performance ultimately depends upon the day-to-day actions of members of staff. Therefore, the Code requires that all signatories have a system in place to identify and meet training and awareness requirements for staff at all levels
	
	The training and awareness could be achieved in a number of ways, eg:
	
	• For each group of staff members, identify the ways in which their actions could have an impact on the environment regarding key areas such as air emissions, waste management, water management and land contamination. For each area consider whether the group of staff has the potential to:
	  • Cause environmental damage
	  • Contribute to or contravene compliance with environmental legislation
	  • Contribute to or contravene compliance with other requirements, eg the Protocol or Code of Practice conditions
	
	• Training programmes can then be provided for the staff. These could make use of existing packages such as the training developed by the WRA for the Wood Packaging Protocol
		• Has the site undertaken an environmental training needs analysis?
		
		• Is there evidence of the conduct of training?
		
		• Are site operatives able to answer basic questions about their environmental responsibilities, eg:
		  • What do you do with sleepers/ treated wood in the waste stream?
		  • How do you dispose of engine oil during vehicle maintenance on site?
		  • What controls do you use to reduce dust?

4 Health and safety management

Code requirement	Guidance	Audit requirement
4.1 All participants must be working with their regulators to secure full compliance	As with the similar environmental requirement, compliance can be met by: • Retaining correspondence with regulators and insurers regarding Health and Safety issues. It is likely that the degree of contact with regulators will be much less than that for environmental issues. However, insurance companies are increasingly adopting a regulatory approach, with requirements which need to be met in order to maintain the validity of employers' liability insurance. The latter is required for legal operation, so the Code auditor will be interested in progress towards meeting insurer requirements • Register of health and safety legislation with a means to keep updated Risk assessments are a legal duty under Health and Safety legislation. Companies with five or more employees are required to record the main findings of these assessments. Key areas on which risk assessments should normally be held include: • Site transport • Control of contractors/visitors/visiting drivers • Manual handling (Manual Handling Operations Regulations 1992) • Machinery (Provision and Use of Work Equipment Regulations 1998) • Noise (Control of Noise at Work Regulations 2005) • Personal Protective Equipment (Personal Protective Equipment at Work Regulations 1992) • Fire (Fire Reform Order 2005) • Dust inhalation (Control of Substances Hazardous to Health Regulations 2002) • Work at Height Regulations 2005	• Does the site have a method of identifying current legal requirements? • Is compliance borne out by actions on the site visible during the tour? • Is there a mechanism to identify potential future legal requirements? • Are records kept regarding correspondence/ site visit reports which show that the company has worked with the regulators and insurers to achieve an acceptable level of performance? • Are risk assessments held for key issues?

Code requirement	Guidance	Audit requirement
4.2 All participants must have a health and safety policy statement to which they adhere	The Code requires that all members have a health and safety policy statement in line with the requirements of the Health and Safety at Work etc Act 1974. This policy will outline the responsibilities for health and safety management as well as documenting the practical arrangements with regard to key issues. An example is provided in **Appendix 6**	• Does the company have a health and safety policy statement? • Does the company have evidence that it adheres to the content? • Is the policy appropriate to the health and safety hazards of the company's activities?

4.3 All participants must have staff training and awareness programmes	Site health and safety performance ultimately depends upon the day-to-day actions of members of staff. Therefore, the Code requires that all signatories have a system in place to identify and meet training and awareness requirements for staff at all levels
	
	As with environmental management, it is likely that there will be a range of training needs for Health and Safety. Competence is typically generated through a mixture of formal qualifications and practical experience
	
	Companies are required to have a 'competent person' who will have enough knowledge to deal with most situations. This individual will require more detailed training than most, eg the 2-week NEBOSH Certificate or 4-day IOSH Managing Safely course. Managers and supervisors might want to undertake a 1 to 3-day course concentrating on legislation and risk assessment. Site operatives are likely to be given training by the competent person and/or supervisors, both at induction and afterwards.
	
	Short tool-box talks on key issues are a typical method of training and some examples can be obtained from the Health and Safety Executive website:
	www.hse.gov.uk
		• Has the site undertaken Health and Safety training needs analysis?
		• Is there evidence of the conduct of training?
		• Are site operatives able to answer basic questions about their Health and Safety responsibilities, eg:
		  • What personal protective equipment do you need to wear on-site?
		  • What should you do if you discover a fire in the yard?
		  • What benefits are there to your health from reducing dust?

5 Quality management

Code requirement	Guidance	Audit requirement
5.1 All participants must have a written specification for their main products	The specifications should be sufficiently detailed to satisfy customer needs. Since customer needs vary widely, no constraints are imposed by the Code of Practice • An example of a detailed specification would be that of material supplied to panelboard mills (specifying moisture content, particle size, particle type etc) as contained in the WPIF 'Guidance for the specification and control of post consumer reclaimed wood raw materials used in the manufacture in the UK of wood particleboards, MDF and OSB'. Panelboard mills will generally have their own written specification which must be adopted to undertake supply • A one-line statement might apply to low cost material supplied to local farmers: eg 'This product will be made up of chipped softwood and hardwood with small amounts (<10%) of board material'	• Does the site have written specifications for their main products?

5.2 All participants must have systems in place to ensure that they meet their quality specifications	All companies have systems in place to ensure that product is of the required quality. The Code requires members to document such systems, which might include a range of elements (many of which have already been addressed through the Code) such as:
	
	• Controlling incoming material:
	
	  • Supplier education
	
	  • Adoption of a written specification
	
	  • Adoption of the Protocol on the verification of incoming material and training site operatives on sorting and identification
	
	• Controlling processing and storage arrangements to separate different grades of material
	
	• Sites should conduct sufficient sampling of the finished product to satisfy their customers that the products supplied are within the performance ranges stated in the specification. For example, testing may include: moisture content, fines content, maximum particle size and colour
		• Does the site have systems in place to make sure that the finished product is in line with the specification? eg:
		
		  • Supplier education, written specification and adoption of the Protocol on the verification of incoming material
		
		  • Training for operatives to ensure the identification and removal of contaminants
		
		  • Sampling of the finished product to ensure that it is within the accepted ranges

6 Engagement with customers

Code requirement	Guidance	Audit requirement
6.1 Clear and truthful marketing and advertising	Participants must be able to justify claims made in marketing and advertising statements. Auditors will want to review promotional material to ensure that claims made in the literature can be justified	• Is the company using clear and truthful marketing and advertising claims?
6.2 Supply of Code information	Members of the Code of Practice are required to provide information on the Code to their customers to identify the standards which can be expected of Code members. The more that members promote the Code, the more benefit they will derive as customer awareness increases	• Does the company provide information on the Code to their current and potential customers?

Appendix 1

Example of a schedule of acceptable and non-acceptable material

Supplier quotation .....

Date .....

Supplier name and contact details .....

Acceptable material types
The following types of wooden material may be included:

- Softwood.
- Softwood packaging – pallets, crates and reels; and
- Hardwood – light coloured hardwood up to 5% of total volume of load.

Non-acceptable material types
The following types of wooden material may **NOT** be included:

- Chipboard and melamine-faced chipboard.
- Medium density fibreboard (MDF).
- Treated timber.
- Dark coloured hardwood; and
- Any other non-wood substances such as metal, plastic, glass, rubble, paper and cardboard.

Rejection procedure
If a load contains non-acceptable materials, the company reserves the right to use one of the following options:

- **Light contamination:** load will be photographed with a copy provided to the supplier along with a written warning. A surcharge may be imposed on the first or subsequent occasions, to cover management time; or
- **Heavier contamination:** load will either be returned to the supplier or sent to landfill. Any charges will be passed onto the customer along with a surcharge, to cover management time.

Appendix 2

Duty of Care legislation guidance for suppliers

A chain of individuals are involved in the life-cycle of waste. This will start with the producer, eg a manufacturer, who will consign the waste to a carrier, who takes it to a recycling or disposal site. The Duty of Care was introduced to prevent the incorrect storage, handling, treatment or the disposal of waste throughout this life-cycle, thus preventing harm to human health or the environment. The legislation puts four duties on waste handlers:

- To prevent the unlawful disposal of the waste by anybody.
- To make sure that waste does not escape your control or that of any other person.
- Only to transfer the waste to 'authorised persons'.
- To give the person taking the waste a written description which will enable them to deal lawfully with the waste.

What does this mean for you as a waste producer?

- To fulfil the first three duties, you need to ensure that you only give your waste to responsible operators. Commercial waste carrying companies must hold a waste carrier registration certificate which is issued by the Environment Agency or Scottish Environment Protection Agency (SEPA). You should obtain a copy of the certificate for each company which collects waste from your site before using them for the first time.

Attached to this note is a copy of ..... Wood Recycling Ltd's waste carrier registration certificate. This should be filed safely.

- Written descriptions: these are usually incorporated within 'waste transfer notes' and they can be provided for each collection or on an annual basis. They should be kept for at least three years.

The consequences of not fulfilling Duty of Care requirements

The aim of the Duty of Care is to stop unscrupulous companies collecting waste very cheaply and fly-tipping it. By following the requirements, you will have an auditable paper trail to show that you have taken precautions to avoid your waste being handled incorrectly. If you have experienced fly-tipping where you live or work, you will recognise that we all need to play a part in making sure that waste is only collected by responsible operators. Failing to fulfil the requirements of the Duty could potentially result in prosecution by the Environment Agency or SEPA.

Attached: copy of ..... Wood Recycling Ltd's waste carrier registration certificate and a copy of actual annual transfer note for waste or an example.

Appendix 3

Register of environmental regulations

The following table is an extract to illustrate one potential format that a register of environmental regulations might take.

Legislation	Relevance to company	What do we do about the regime?
Waste controls		
Environmental Protection Act 1990, Part II: Duty of care	Imposes a duty on sites to maintain controls which safeguard waste both on site, during and after transfer	• Waste is stored in a secure and contained manner on-site • Carrier registration certificates are provided to suppliers and are held for any waste contractors taking waste from our site
etc	etc	etc
Air emissions		
Environmental Protection Act 1990, Part III: Statutory Nuisance	The company must control any emission which could cause a nuisance to neighbours such as smoke, dust or noise Makes it an offence to emit dark smoke from a premises, eg due to yard burning	• We hold a complaints register • Any complaint from neighbours is reportable to …… and will be investigated
Clean Air Act 1993		• No open fires are allowed on site

Appendix 4

Writing an environmental policy statement

What is an environmental policy?
An environmental policy is a publicly-available statement of a company's environmental aims and principles. A policy statement has a number of potential uses:

- Guide environmental management progress of the company.
- Keep others informed of progress and direction, eg employees, stake holders and neighbours; and
- To inform and assure potential suppliers and customers that your company takes environmental issues seriously and has addressed relevant areas.

Writing a policy
Identify your company's significant environmental aspects.

In order to ensure that the policy is relevant, a good starting point is to identify the areas of your business which have environmental implications whether it be due to legislation, best practice, cost or potential environmental impact. Key areas might include:

- Control of dust and other statutory nuisance such as noise and light pollution.
- Management of effluent/site run-off.
- Management of hazardous waste.
- Energy conservation.
- Minimisation of waste leaving the site for landfill; and
- Conduct of environmental training to ensure that operators are aware of their responsibilities.

Content
The policy may be used as a stand-alone document so it is useful to include a brief description of the company and the nature of its activities. Eg:

- Company X operates in two main areas: pallet reuse and wood recycling. Our main processes include the receipt and sorting of wooden packaging and other wood waste streams. Materials which are not suited for reuse are processed through a shredder for use in a range of recycling operations; or
- The operations of Company X are contained on a single site at ..... We have been recycling wood waste on this site for the past 10 years, with a collection catchment of around 100 miles.

It is then useful to outline what the company is seeking to achieve with regard to environmental management. This should include a commitment to comply with all relevant environmental regulations and to achieve continual improvement of environmental performance. Eg:

- We will meet, and where practical exceed, all relevant regulatory requirements.
- We shall strive to operate in accordance with all relevant environmental regulations, professional codes of practice and industry guidelines, whichever are highest.
- We fully recognise our duty to care for the environment and we intend to meet, and where possible to exceed, environmental regulations that pertain to our business.
- We have a system to identify all relevant environmental legislation and to ensure that we meet all resulting requirements.
- The company will seek to continually identify, evaluate and reduce the environmental impact of our operations; and
- We undertake to regularly evaluate our environmental performance and to improve this performance on an ongoing basis.

With regard to the main policy statement regarding site operation, it is logical to start at the goods-in end of the operation. Eg:

- We are committed to working with our suppliers of wood waste to ensure that there is a good level of awareness regarding which materials are acceptable for recycling. The close monitoring of incoming material enables our company to provide assurance to the end users of our product regarding the nature of the supply chain and the control of contamination; and
- Our company operates in accordance with the Protocol on the Verification of Wood Packaging to ensure the correct identification and quantification of incoming materials. This enables the early removal of contamination which might compromise product quality.

Other operational areas which might be addressed include:

- The company will identify the major areas of resource and utility consumption and evaluate the options to maximise the efficiency of usage.
- Waste production will be minimised where possible. Where unavoidable, waste streams will be evaluated for their reuse and recycling potential.
- We will seek to divert our waste from landfill where possible; preferring to reuse, recycle or recover value from our discarded materials.
- The company will ensure that waste taken off site will be consigned to registered waste carriers for treatment/disposal at appropriate sites.
- We recognise the potential impact of neighbourhood nuisance such as noise and dust generation. Measures are in place to management such issues; and
- The company recognises that all employees have an important environmental management role. Individuals will be helped to perform this role as best they can through the development of environmental training sessions and the use of suggestion schemes.

Appendix 5

Environmental policy statement example

The Wood Recycling Company: Environmental Policy Statement

The Wood Recycling Company operates in two main areas: pallet reuse and wood recycling. Our main processes include the receipt and sorting of wooden packaging and other wood waste streams. Materials which are not suited for reuse are processed through a shredder for use in a range of recycling operations.

We believe that our overall environmental impact is positive. Our business focuses upon the creation of products and raw materials from wood-based materials which might otherwise be discarded.

The company attaches great importance to matters concerning the environment. Our policy is to meet and, where practical, exceed all relevant regulatory requirements and to minimise any adverse environmental effects caused as a result of our activities or products.

We are committed to working with our suppliers of wood waste to ensure that there is a good level of awareness regarding which materials are acceptable for recycling. The close regulation of incoming material enables our company to provide assurance to the end users of our product regarding the nature of the supply chain and the control of contamination.

The company will identify the major areas of resource and utility consumption and evaluate the options to maximise the efficiency of usage.

Waste production will be minimised where possible. Where unavoidable, waste streams will be evaluated for their reuse and recycling potential.

We recognise the potential impact of neighbourhood nuisance such as noise and dust generation. Measures are in place to manage such issues.

The company recognises that all employees have an important environmental management role. Individuals will be helped to perform this role as best they can through the development of environmental training sessions and the use of suggestion schemes.

This policy is reviewed and updated on a regular basis.

Signed: .....

Managing Director

Date: .....

Appendix 6

Health and Safety policy statement example

The Wood Recycling Company: Health and Safety policy statement

The Wood Recycling Company is committed to ensuring the health, safety and welfare of its employees, so far as is reasonably practicable. We also fully accept our responsibility for other persons who may be affected by our activities. We will take steps to ensure that our statutory duties are met at all times.

Each employee will be given such information, instruction and training as is necessary to enable the safe performance of work activities.

It is the duty of management to ensure that all processes and systems of work are designed to take account of health and safety and are properly supervised at all times.

Adequate facilities and arrangements will be maintained to enable employees and their representatives to raise issues of health and safety.

Competent people will be appointed to assist us in meeting our statutory duties including, where appropriate, specialists from outside the organisation.

Every employee must cooperate with us to enable all statutory duties to be complied with. The successful implementation of this policy requires total commitment from all levels of employee, from the boardroom to the shop-floor. Each individual has a legal obligation to take reasonable care for his or her own health and safety, and for the safety of other people who may be affected by his or her acts or omissions. Full details of the organisation and arrangements for health and safety will be set out in separate documents.

This policy will be regularly monitored to ensure that the objectives are achieved. It will be reviewed and, if necessary, revised in the light of legislative or organisational changes.

Signed: .....

Managing Director

Date: .....

Health and Safety organisational responsibilities

In order to ensure that health and safety is successfully managed within the organisation, the following responsibilities have been allocated.

Overall responsibility

The managing director accepts overall responsibility for all matters, including those regarding health, safety and welfare.

Management responsibility

Managers are responsible for ensuring that the safety policy is implemented within their own departments. Managers must monitor the workplace to ensure that safe conditions are maintained. Where risks are identified the manager must ensure that these are rectified, so far as is reasonably practicable. Management duties include:

- Ensuring that employees, contractors and visitors are aware of safety procedures.
- Establishing that all equipment, plant and substances used are suitable for the task and are kept in good working condition; this includes the regular maintenance and servicing of equipment.
- Providing adequate training, information, instruction and supervision to ensure that work is conducted safely.
- Taking immediate and appropriate steps to investigate and rectify any risks to health and safety arising from the work activity.
- Bringing to the prompt attention of senior management any health and safety issue that requires their attention.
- Ensuring that all accidents and 'near misses' are properly recorded and reported and that an investigation is carried out to determine causal factors; and
- Maintaining safe access to and egress from the workplace at all times. Managers dealing with particular topic areas will be advised of any specific health and safety duties.

Employee responsibilities

All employees must:

- Take reasonable care for their own health and safety.
- Consider the safety of other persons who may be affected by their acts or omissions.
- Work in accordance with information and training provided.
- Refrain from intentionally misusing or recklessly interfering with anything that has been provided for health and safety reasons.
- Report any hazardous defects in plant and equipment, or shortcomings in the existing safety arrangements, to a responsible person without delay; and
- Not undertake any task for which authorisation and/or training has not been given.

Competent persons
Competent persons have been appointed to assist us in meeting our health and safety obligations. These people have sufficient knowledge and information to ensure that statutory provisions are met and that the safety policy is being adhered to.

- Health and safety officers: .....

In addition, the company has appointed a number of other individuals to conduct tasks relevant to health and safety:

- First-aiders: .....
- Fire marshals: .....
- Employee safety representative: .....

Arrangements in force

The following section provides a summary of the company policy in respect of key areas of health and safety. Further details can be obtained from the health and safety officer.

Accident reporting
An accident book is kept for the reporting of all accidents leading to personal injury - as required by law. All accidents or 'near misses' must also be reported to management as soon as possible. The health and safety officer is responsible for notifying enforcing authorities where appropriate.

Display screen equipment
Display screen equipment 'users' will be identified by the company and risk assessments will be taken. Information, training, eyesight tests and corrective appliances will be supplied where appropriate.

Electricity at work
Competent persons will be appointed to ensure the regular maintenance, inspection and testing of all electrical equipment. Live work will not be conducted unless essential - and a permit to work system will be employed.

Emergency procedures
It is company policy to eliminate and minimise risks arising from work activities. However, emergency procedures have been developed to cope with incidents such as fire. Emergency drills will be practised on an annual basis.

Fire prevention
The company will take all reasonably practicable steps to minimise fire risks. There will be regular inspection of fire precautions such as exits, alarms, fire-fighting equipment and drills. Employees can minimise fire risks by keeping working areas clean, following company smoking rules and ensuring that electrical equipment is switched off when not in use.

In the event of discovering a fire, the following procedure will be followed .....

First aid
The company will maintain suitable numbers of first aid personnel to deal with minor accidents and emergencies in the workplace. These personnel will have sufficient training and qualifications in accordance with statutory requirements. Identities of first aiders will be displayed throughout the workplace.

Hazardous substances
A number of hazardous substances exist in the workplace. The company conducts risk assessments to identify, evaluate and control these hazards. It is the duty of all employees to play their part in minimising exposure by:

- Wood dust: ensure that dust is minimised by using water sprays on fine material ……..... etc.
- Solvents: lids must be kept on all tins containing solvents. All tins must be stored in flameproof containers when not required.

Legal developments
Management will keep up-to-date with legislation via information from journals, trade bodies and the Health and Safety Executive. Information will be disseminated to relevant individuals.

Machinery
Machinery may only be used by authorised operators. Authorisation will only be granted following an assessment of each operator on the machine in question. The assessment will be documented and a list of operators authorised for each machine will be posted in the relevant work-shop.

Manual handling
Thirty-eight per cent of reportable injuries are due to manual handling. Employees must exercise caution when moving objects by hand. Mechanical aids such as diggers and fork lifts should be used wherever possible. If in doubt, help should be sought when lifting a heavy item.

Noise
The following areas have been designated hearing protection zones as noise levels typically exceed 85 dB(A):

- Chipping zone.
- Sieving zone.

Anyone entering these zones, even for a short time, is legally required to wear hearing protection. Failure to do so may lead to disciplinary action.

- Hearing protection can be obtained from .....

Permits to work
Permit to work systems will be used for the following activities: hot and cold work, entry into confined spaces, equipment disjointing, roof, electrical and excavation work.

Personal protective equipment (PPE)
Various forms of PPE exist within the company eg:

- Toe protection footwear, high visibility jackets and hard hats must be worn on all operational areas of the site.
- Gloves, dust masks, solvent masks, goggles and hearing protection are available for operators.

Operators starting work in a new area will be advised of the need to use PPE by their manager who is also responsible for issuing PPE and instructing employees upon its use. Equipment must be signed for and records of training will be kept.

Risk assessments
Risk assessments will be undertaken to identify and prioritise areas of health and safety concern within the workplace. Measures will subsequently be taken to minimise risks.

Smoking
Smoking is only permitted in designated areas.

Transport
The movement of vehicles is a major hazard on-site. All company personnel and visiting drivers will be expected to adhere to site speed limits.

Additional site specific information on:

- One way systems.
- Parking areas.
- Reversing with banksmen.
- All pedestrians in operational areas must wear high visibility jackets.

Visitors
The company accepts its responsibility for the health and safety of all personnel that come onto site. Visitors will be required to sign in and out upon each site visit. They must be accompanied at all times in operational areas and they will be required to wear high visibility jackets.

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