



SAFETY STATEMENT & SAFETY MANAGEMENT SYSTEM

Of

Thorntons Recycling

Revision 10, October 2010

Contents	Page
HSP 1.0 Introduction	4
PART (I): Policies and Arrangements for Health and Safety	4
HSP 2.0 Management Safety Policy.	5
HSP 3.0 Safety Management Structure	7
HSP 4.0 Responsibilities	9
HSP 5.0 Implementation and Operation of Safety Policy	15
HSP 6.0 Documentation and Distribution of Safety Statement	17
HSP 7.0 Provision of Safety Training, Awareness and Instruction	18
HSP 8.0 Provision of Practical and Safe Working Systems – (Operation Control)	19
HSP 9.0 Permit to work	19
HSP 10.0 Provision of Personal Protective Equipment	21
HSP 11.0 Health Surveillance Policy	25
HSP 12.0 Consultation, Participation and Communication	26
HSP 13.0 Welfare	27
HSP 14.0 Alcohol & Drugs	27
HSP 15.0 Bullying / Harassment Policy	28
HSP 16.0 Stress Policy	33
HSP 17.0 Smoking Policy	37
HSP 18.0 Pregnant Employees	38
HSP 19.0 First Aid	38
HSP 20.0 Emergency / Fire Procedures	39
HSP 21.0 Fire Equipment	40
HSP 22.0 Accident/Incident Reporting	40
HSP 23.0 Working with Hazardous Materials	41
HSP 24.0 Disciplinary Action	43
HSP 25.0 Managing Director's Annual Review	44
HSP 26.0 Contractors and Visitors	45
HSP 27.0 Codes of Practice	45
HSP 28.0 Construction Design and Management (CDM)	46

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Page 2 of 54
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Safety Statement and Health & Safety Management System of Thorntons Recycling

HSP 29.0	<i>Safety Signs and Signals</i>	46
HSP 30.0	<i>Traffic Routes / Safety Walkways</i>	47
HSP 31.0	<i>Housekeeping</i>	47
HSP 32.0	<i>Roofs and Work at Height</i>	48
HSP 33.0	<i>Work Equipment and Vehicles</i>	48
HSP 34.0	<i>Lifting Operations and Lifting Equipment</i>	49
HSP 35.0	<i>Mobile Elevated Work Platform (MEWP)</i>	49
HSP 36.0	<i>Manual Handling</i>	49
HSP 37.0	<i>Young Persons / Sensitive Risk Groups</i>	50
	<i>Concluding comment</i>	51
	<i>PART (II): Risk Assessments</i>	52

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Page 3 of 54
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HSP 1.0 Introduction

This Safety Statement forms part of the Thornton Recycling Health & safety Management System. Thorntons have developed a Safety Management system to the internationally recognised specification OHSAS 18001:2007.

The Part 1 of the Safety Statement is generic to all activities and sites with the Thornton Recycling Group. The Safety Statement becomes site specific when the risk assessments for that area / facility are attached in the Part 2.

PART (I): Policies and Arrangements for Health and Safety

THE SAFETY STATEMENT

In accordance with Section 20 – Hazard Identification and Risk Assessment, of the Safety, Health and Welfare Act, 2005, and clause 4.3.2 of OHSAS 18001, 2007 Thorntons Recycling has prepared this Safety Statement.

This document describes the systems and resources provided for the assurance of safety for all Thorntons Recycling activities.

It is important that you read this carefully and understand your role in the overall arrangements for safety at Thorntons Recycling

Circulation

Name

Title

Mr. Gary Brady
Mrs. Carmel Thornton
Ms Anna Marie Thornton
Mr. Paul Thornton
Mr. Shane Thornton

Managing Director
Director
Director
Director
Director

Mr. Nicole Fitzgerald
Ms. Michelle McDonagh
Mr. Tommy Rogers
Ms. Mercedes Kavanagh
Mr. Ted Moran

Finance Manager
Human Resources Manager (External)
Health & Safety Manager
Group Environmental Manager
KR Operations Manager /Maintenance
Manager

Mr. Conor Sunderland
Mr. Paul Thornton
Mr. John Staunton
Mr. Mark Conroy
Mr. Jim Brennan
Mr. Tom McDonnell
Mr. Alan Elliot

Transport Manager
Operations Director
Sales Manager
TTS Manager
Security Shredding Manager
Kilmainhamwood Facility Manager
ELV Manager

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Page 4 of 54
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Safety Statement Revision.

The Health & Safety Manager is responsible for the issue, amendment and control of the Safety Statement. The Safety Statement will be reviewed on an annual basis by the Health & Safety Manager and will be changed accordingly as names of responsible persons change, or risks change or changes in legislation occur.

The Safety Statement will also form part of the internal audit schedule and will be subject to regular audits during any period of a year.

A statement of fact for inclusion in the end of the years Directors Annual Report as per the requirements of the Safety, Health and Welfare at Work Act, 2005 will also be prepared on an Annual basis.

HSP 2.0 Management Safety Policy.

The *Safety, Health and Welfare at Work Act, 2005* requires Thorntons Recycling to prepare and issue a safety statement setting out its policy on safety. This statement together with the following will be known collectively as the 'safety statement':

- Hazard identification and risk reduction guidelines.
- Allocation of responsibilities.
- Consultation procedure

The Managing Director of Thorntons Recycling recognises the paramount importance of safety, health and welfare, to all employees, in the successful conduct of business. This Safety Statement, in accordance with *the Safety, Health and Welfare at Work Act, 2005*, outlines the policy of Thorntons Recycling for ensuring so far as is reasonably practicable, the Health, Safety and Welfare of employees, the public, contractors and visitors. Thorntons Recycling will comply with the requirements of the *Safety, Health and Welfare at work Act, 2005* and all other statutory requirements, Codes of Practice and national standards.

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EHS Policy

Thorntons Recycling collects domestic, commercial and industrial solid wastes and hazardous and non-hazardous liquid wastes. Materials are processed at a number of waste management facilities where the primary objective is to maximise recycling and /or ensure the safe disposal of non-recyclable waste. We are committed to achieving the highest possible level of environmental performance and safety in all areas of the company's operations. As a leading waste management company in Ireland, Thorntons Recycling is striving to attain EHS excellence through our Integrated Management System (IMS) by continually improving performance and advancing the following objectives:

- Prevention and minimisation of waste produced by all staff in the performance of their day-to-day operations and administration
- Achievement of the highest possible recycling rates with the waste we handle
- Compliance with all Irish and European environmental, health & safety legislation
- Compliance with all waste licences and permits issued to the company
- Prevention of pollution arising from the company's waste management activities
- Use of cleaner technology, where practical and available
- Contribution towards education of the public and our customers in waste prevention, minimisation and recycling
- Safe and healthy working conditions, including hazard identification, risk assessment and determining controls
- Safe equipment and systems of work
- Provision of appropriate information and instruction, competence, training and awareness
- Provision of a competent person to advise and assist in securing the health, safety and welfare of employees and others
- Communication of the EHS policy and health and safety system to include participation and consultation

This Policy will be achieved with the implementation and management of an Integrated Environmental and Health & Safety Management system certified to the internationally recognised Standards ISO 14001; 2004 and OHSAS 18001; 2007.

Signed: 

Date: 24/5/11

Title: **Managing Director**

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Page 6 of 54
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HSP 3.0 Safety Management Structure

The persons or titles listed below, within the company safety management structure below are responsible directly or by formal delegation for:

- The effective implementation of the safety policy ensuring that their areas of responsibility are run in accordance with the policy.
- Ensuring that managers and supervisors under their area of responsibility are trained to manage the implementation and ongoing monitoring of this safety policy.

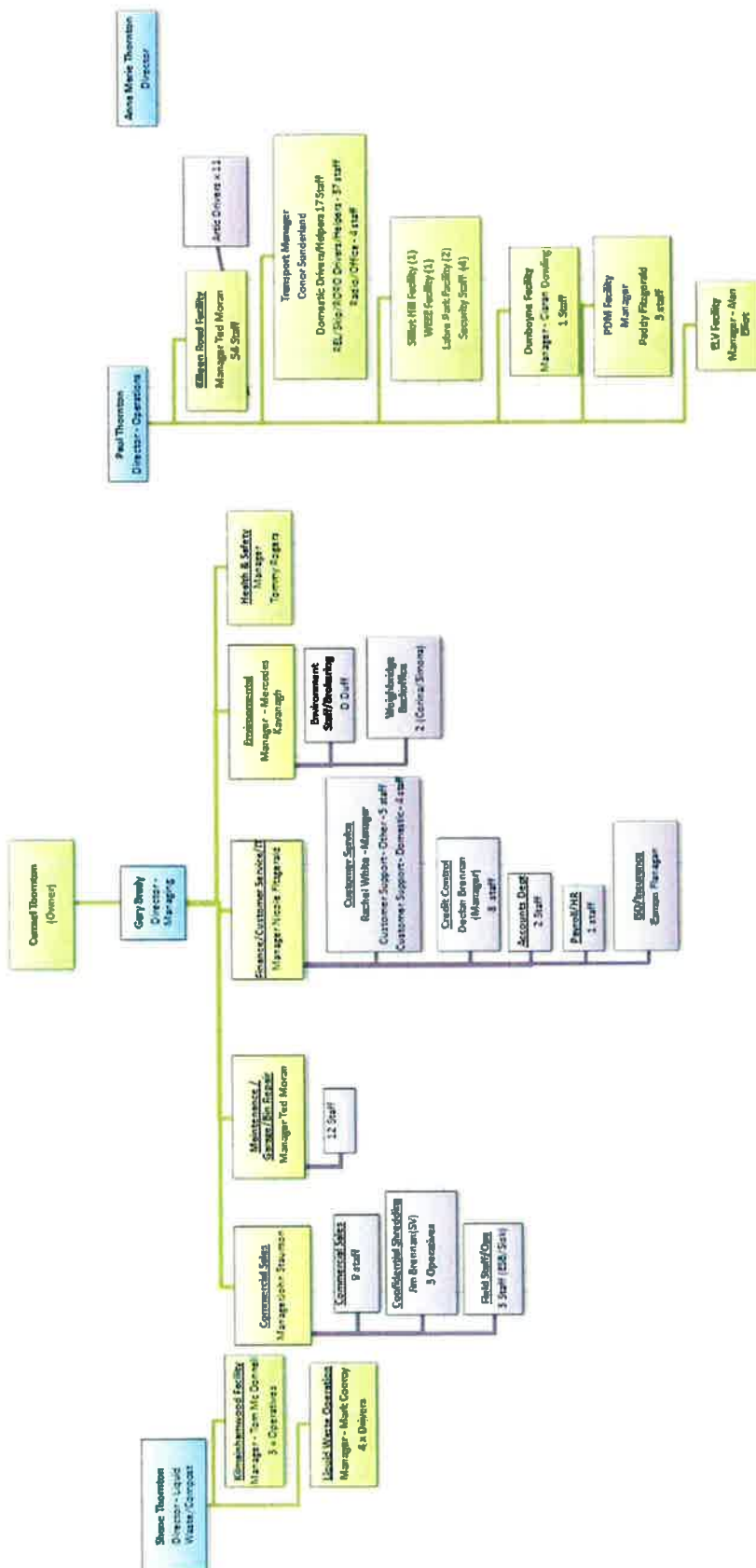
Safety Management Structure in Thorntons Recycling **Updated October 2010**

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Page 8 of 54
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HSP 4.0 Responsibilities

Allocation of Responsibilities for Safety/Health under the Safety, Health and Welfare at Work Act, 2005.

Managing Director – Gary Brady

Safety begins at management level and the overall responsibility for the establishment and maintenance of an effective policy for Safety, Health and Welfare at Work rests with the Managing Director.

He shall:

- Demonstrate commitment by taking active steps to be aware of the safety record of the premises and shall issue any necessary reasonable directives in the interest of the health, safety and welfare of all employees and third parties.
- Endeavour to ensure that there are sufficient funds and facilities available to enable the safety policy to be reasonably implemented.
- Annually appraise the effectiveness of the safety statement.
- Ensure that the responsibility is properly assigned understood and accepted at all levels.
- Procure advice and assistance whenever necessary and take heed, together with remedial action, on any matters brought to his attention.

Allocation of Responsibilities for Safety/Health under the Safety, Health and Welfare at Work Act, 2005

Managers – Operations / Maintenance / Transport / Projects

Managers are responsible for ensuring that the Safety Statement is effectively communicated and observed at all levels by:

- Ensuring at all times that competent staff and appropriate materials are available to meet the requirements of the safety legislation.
- Ensuring that employees under their control and others, including contractors/ visitors, are made aware of and comply with the company's health and safety statement and the organisation and arrangements for carrying it out.
- Ensuring that this safety statement is available to all staff within their area of responsibility and appropriate third parties.
- Ensuring the all staff under their control is held accountable for their performance in relation to occupational health and safety and that this performance is evaluated at the time of their annual review.
- To organise their department, section or workplace so that operations or work are carried out to a satisfactory safety standard, so as to reduce the risk to persons, equipment and materials so far as is reasonably practical.
- To issue standard operating procedures in writing where complex operation procedures are involved.
- Have an understanding of Irish health and safety legislation relevant to the company's operations.

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Page 9 of 54
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Safety Statement and Health & Safety Management System of Thorntons Recycling

- Ensure that operational hazards are addressed; the risks understood and corrective measures are implemented to prevent danger to employees as far as is reasonably practical.
- Take prompt corrective action where unsafe conditions and unsafe acts are noted.
- Ensure that all relevant health, safety and welfare information obtained from the health and safety department regarding new methods of accident prevention, new legislation requirements and codes of practice is acted upon in so far as is reasonably practical.
- Discipline any member of staff failing to comply with the safety policy.

Allocation of Responsibilities for Safety/Health under the Safety, Health and Welfare at Work Act, 2005.

Health & Safety Manager

The Health & Safety Manager is responsible for ensuring that all staff receive adequate health and safety training, including any specialist training they might require, and:

- Investigate fully all reported accidents within 72 hours and advise on remedial measures to prevent a re-occurrence.
- Ensure updated material safety data sheets (MSDS) are available for all hazardous materials used on site.
- Ensure Site Safety Standards including the formulation of good housekeeping, planned maintenance and safety programmes are established.
- Ensure that all work necessary for safety and good health is carried out properly.
- Ensure that the safety/health aspects of all new hazardous materials, process, machinery and equipment are fully assessed prior to purchase and introduction for use on site.
- Ensure that all statutory examinations and inspections of equipment are carried out and records maintained.
- Ensure that all employees and visitors are provided with the correct personal protective equipment (PPE) and that the said personal protective equipment is maintained in a usable condition at all times.
- Ensure that all injured personnel are promptly referred to a Doctor or hospital for treatment.
- Ensure that all safety rules, regulations and procedures are kept under review so that they remain applicable to the site and process.
- Ensure that all employees are familiar with emergency procedures, and that appropriate emergency facilities are available.
- Ensure that a comprehensive health surveillance programme is available to all employees.

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Page 10 of 54
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Safety Statement and Health & Safety Management System of Thorntons Recycling

- Ensure that the company complies with all relevant Health and Safety legislation and that senior management is aware of same.
- Ensure that procedures are put in place for consultation with employees in relation to the Safety, Health and Welfare at Work Act, 2005 and the Safety, Health and Welfare Act Work, (General Application) Regulations 2007.
- Designate the Management Representative for OHSAS 18001;2007 Management System

Allocation of Responsibilities for Safety/Health under the Safety, Health and Welfare at Work Act, 2005.

Supervisors – (Dunboyne/ PDM /KR Yard / C.I.D Recycling / KR Dry Recycling /Baler / ELV / PW Garage / Kilmainhamwood /KR Canteen / Offices/ Projects/ RELs/Tanker Services/ Security Shredding/ Labre Park/ Bin Maintenance)

Supervisors are responsible for ensuring that the employees under their immediate control and others, including visitors and contractors, are made aware of and comply with the Safety Statement of Thorntons Recycling by:

- Being fully familiar with the company's Safety Statement and any subsequent revisions.
- Showing through personal behaviour, that only the highest standards of safety are acceptable.
- Communicating with personnel under their supervision regarding standard policy procedures and conditions.
- Ensuring that all employees under their control receive adequate safety training and instruction appropriate to their tasks.
- Ensuring that all employees under their immediate control are aware of actions to be taken in case of emergency and that properly maintained fire fighting equipment is available within their area.
- Ensuring that good housekeeping practices and standards are maintained and in particular that Fire Exit routes and Emergency Exits are kept clear and that Fire points are not obstructed at any time.
- Ensuring that good housekeeping standards are maintained and in particular that fire exit routes are kept clear and that fire points are not obstructed.
- Ensuring that thorough and prompt investigations are carried out into all reported accidents and that a completed Accident Report Form is submitted to the appropriate Manager.
- Considering representations about health and safety from employees under their control.
- Carrying out regular safety surveys in their departments or areas.
- Ensuring all safety devices are correctly fitted adjusted and maintained.
- When applicable, ensuring that suitable Personal Protective Equipment and Clothing is supplied and worn by employees under their control.
- Should ensure that any contractors working within the premises observe

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Page 11 of 54
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Safety Statement and Health & Safety Management System of Thorntons Recycling

reasonable safety considerations.

- Maintaining safe working conditions and practices by being alert to and immediately correcting unsafe conditions so far as is reasonably practical.
- Ensuring all safety devices are correctly fitted, adjusted, tested and maintained.

Allocation of Responsibilities for Safety/Health under the Safety, Health and Welfare at Work Act, 2005.

Employees – All Areas

Employees have general statutory obligations under the *Safety, Health and Welfare at Work Act, 2005, Chapter 2 Section 13*, which includes the following:

Employees must:

- comply with the relevant statutory provisions, as appropriate, and take reasonable care to protect his or her safety, health and welfare and the safety, health and welfare of any other person who may be affected by the employee's acts or omissions at work,
- ensure that he or she is not under the influence of an intoxicant to the extent that he or she is in such a state as to endanger his or her own safety, health or welfare at work or that of any other person,
- if reasonably required by his or her employer, submit to any appropriate, reasonable and proportionate tests for intoxicants by, or under the supervision of, a registered medical practitioner who is a competent person, as may be prescribed,
- co-operate with his or her employer or any other person so far as is necessary to enable his or her employer or the other person to comply with the relevant statutory provisions, as appropriate,
- not engage in improper conduct or other behaviour that is likely to endanger his or her own safety, health and welfare at work or that of any other person,
- attend such training and, as appropriate, undergo such assessment as may reasonably be required by his or her employer or as may be prescribed relating to safety, health and welfare at work or relating to the work carried out by the employee,
- having regard to his or her training and the instructions given by his or her employer, make correct use of any article or substance provided for use by the employee at work or for the protection of his or her safety, health and welfare at work, including protective clothing or equipment,
- report to his or her employer or to any other appropriate person, as soon as practicable—
 - a. any work being carried on, or likely to be carried on, in a manner which may endanger the safety, health or welfare at work of the employee or that of any other person,

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Page 12 of 54
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- b. any defect in the place of work, the systems of work, any article or substance which might endanger the safety, health or welfare at work of the employee or that of any other person, or
- c. any contravention of the relevant statutory provisions which may endanger the safety, health and welfare at work of the employee or that of any other person of which he or she is aware.

A person shall not intentionally, recklessly or without reasonable cause—

- interfere with, misuse or damage anything provided under the relevant statutory provisions or otherwise for securing the safety, health and welfare of persons at work, or
- place at risk the safety, health or welfare of persons in connection with work activities.

In addition, employees are reminded:

- Only carry out duties you are trained to perform.
- Keep work areas clean and uncluttered.
- Be careful when moving items.
- Do not run.
- Any form of dangerous pranks or unauthorised hazardous activities is totally prohibited on company premises.

Allocation of Responsibilities for Safety/Health under the Safety, Health and Welfare at Work Act, 2005.

The Safety Representative

Part 4, Section 25(1) of the Safety, Health and Welfare at Work Act, 2005 states that employees may select a Safety Representative who has the following rights under the legislation:

- To make representations on any aspects of safety, health and welfare at the place of work.
- To investigate accidents and dangerous occurrences. They shall not interfere with or obstruct the performance of any statutory obligation required to be performed by any persons under any of the relevant statutory provisions.
- To make oral or written representations to inspectors on matters of safety, health and welfare at work.
- To receive advice and information from inspectors on matters of safety, health and welfare at work

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Page 13 of 54
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- To accompany an inspector on any tour of inspection other than a tour of inspection made by an inspector for the purpose of investigating an accident.
- Subject to prior notice to the employer, they may carry out inspections of the premises to determine any potential hazards on the premises.
- Subject to prior notice to the employer, they may investigate potential hazards and complaints made by any employee whom he represents relating to that employee's safety, health and welfare at the place of work.
- Consult and liaise on matters relating to safety, health and welfare at work with any other safety representatives who may be appointed in the undertaking concerned, whether or not those safety representatives work in the same place of work, in different places of work under the control of the employer or at different times at the place of work.

Employees shall be advised of their right to appoint / select a safety representative, refer to Section HSP14 of this Safety Statement for further details on the workings of the Safety Committee.

Allocation of Responsibilities for Safety/Health under the Safety, Health and Welfare at Work Act, 2005.

Contractors / Self-Employed Persons

Sub-contractors and self-employed persons shall provide their safety statement when requested to do so and shall:

- Conform to the duties and responsibilities as for employees.
- Provide evidence when requested, showing that appropriate employer's liability and public liability insurances are in place.
- Bring to the attention of the company's management and anyone else who may be affected by any process or use of materials, which may endanger health and safety while at work.
- Comply with the requirements of this safety statement, and co-operate with site management in providing a safe place of work, a safe system of operation and wearing of protective clothing.
- Ensure all their employees and others under their care are provided with and wear personal protective equipment when required.
- Attend any safety courses prepared for workers on projects managed by this company.
- Report any defect in the plant and equipment, place of work, or system of work without unreasonable delay.
- Only use competent and suitable persons on site.
- Obtain the consent of the company to engage persons other than their direct employees on site.

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Page 14 of 54
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Safety Statement and Health & Safety Management System of Thorntons Recycling

- Ensure that their managers, supervisors and employees are aware of the obligations placed upon them with regard to health and safety.
- Provide a 'Method Statement' where appropriate for the contractual work being undertaken.

Contractors and Subcontractors are subject to approval by following the requirements from PM16, Contractor Control and QP06, Third Party Contractors.

Allocation of Responsibilities for Safety/Health under the Safety, Health and Welfare at Work Act, 2005.

Visitors (not including Contractors)

It is the responsibility of all company employees to ensure the safety of their visitors on the premises. All visitors (not including Contractors) to any Thorntons Recycling Site, including sales people, consultants, inspectors, etc, are bound by the following rules:

- They should observe the Company Safety Rules and any instructions given by Company personnel who enforce the Company Safety Policy.
- They should not visit or commence work on site until the relevant safety rules and information has been read understood and accepted.
- They should not work on the premises or on site unless covered by their insurance against risk.
- They should not enter unauthorised areas where they are not authorised to visit.
- Obey all signage on site.
- Sign in and out at either the reception or weighbridge depending on which is appropriate.
- Only carry out the scope of work agreed or visit the areas agreed with by their site contact.
- Report any accidents of incidents while on site.

HSP 5.0 Implementation and Operation of Safety Policy

Risk Management System

The Risk Management System is a modern safety / loss control evaluation system. It provides the means for a systematic analysis of each of thirteen safety / loss control elements to determine the extent and quality of loss control management.

The Risk Management System provides Thorntons Recycling with practical techniques for planning, implementing and monitoring effective safety management systems. The system assists in the;

- Identifying and assessing of risks on a day-to-day basis,

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Page 15 of 54
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Safety Statement and Health & Safety Management System of Thorntons Recycling

- Identifying system elements and activities that are effective for managing risk and controlling loss, and which provide a basis for continuous improvement.
- Apply professional management principles and techniques to design, develop and implement comprehensive safety systems.
- And to monitor and manage change within the organisation's culture.

Some benefits of the system;

- It provides a precise evaluation of safety performance for Thorntons Recycling Operations.
- It provides a practical, ongoing means for identifying the majority of safety, health, property damage, process loss, fire, explosion and other loss exposures facing the Thorntons Recycling Operations.
- It reduces operating costs of accidents and other losses by eliminating general management inefficiencies.

In summary, any activity, including safety, can deteriorate to produce losses involving people, property and profit if not properly monitored. The need to protect assets by taking appropriate measures to control loss has never been greater. It is a primary goal of the Risk Management System to give Thorntons Recycling the early warning so critical to the prevention and control of losses.

Identification of Hazards and Determining controls

Thorntons Recycling will carry out Hazards Audits internally on an annual basis and risk assessments on an ongoing basis. The company further commits to make use of the advice available from the Health and Safety Authority and where necessary the Company will make use of competent consultants and bodies with special skills and services to augment the internal skills.

Engineering Hazards

In so far as is practical, Thorntons Recycling commits itself to dealing with the hazards identified and determine controls. Firstly, on the basis of their elimination by engineering means, e.g. machine guarding, replacement of a hazardous substance with benign or less hazardous substances, provision of special tools or access arrangements, etc. This approach will take into account the norms in our industry, the expert advice available and objective standards where they are available.

To augment this policy, the maintenance functions will have responsibility for carrying out full plant preventative maintenance programme, paying special attention to safety aspects of our buildings, plant and equipment. A specific specification detailing safety requirements for certain capital equipment purchased, will be requirements to be attached to purchase conditions.

Instruction and Training

Recognising that even with the best engineered work arrangement, people may still require clearly defined safety procedures and instructions, for that reason there is substantial commitment by Thorntons Recycling to identify safety training needs, to carry out the training and to measure and improve competence of trainees/employees and to maintain associated records.

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Page 16 of 54
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Safety Statement and Health & Safety Management System of Thorntons Recycling

All employees will be expected to co-operate in the training exercise provided. Certain tasks in our operations require special safety procedures to be followed. Where these arise, the employees involved receive special instruction. The Health & Safety Department shall identify the training needs and report on the options available to carry out the training. Induction training will be provided for new employees.

Formal Risk Assessment Procedure

A formal risk assessment procedure has been developed and is used for the identification and assessment of hazards in the work place and determining controls. This procedure covers all sites and services. This procedure is PM15, Risk assessments

HSP 6.0 Documentation and Distribution of Safety Statement

A copy of the Safety Statement will be issued to the relevant Managers and Supervisors. The terms of the Safety Statement will be introduced in an appropriate manner for the attention of all staff.

The Master Copy of the Safety Statement is held on the IMS drive. The Health and Safety Manager has responsibility for making amendments to the master copy of the safety statement. Controlled copies of the Safety Statement will be issued to personnel as specified in the footer of this document.

Document Control is carried using PM 10, Document Control

The Health and Safety Manager is responsible for the issue of new and revised safety statements. Those on controlled copy issue will be responsible for ensuring that all revisions are kept up to date and those previous revisions are disposed of. To ensure that each copy of the Safety Statement contains a record of all changes, the Health and Safety Manager will record changes or amendments on a documentation list contained in PM10-F01, which will then be circulated to all on a circulation list.

Each Safety Statement must contain the relevant Risk assessments for that facility. The risk assessments are separate documents. When a hardcopy is printed off for an area the risk assessments must be attached with that Safety Statement.

The following reference numbers are used to identify each area and the associated risk assessments;

- 1.1 Killeen Road
- 1.2 Dunboyne
- 1.3 Head Office
- 1.4 ELV Centre
- 1.5 PDM
- 1.6 Tanker Service
- 1.7 Kilmainhamwood
- 1.8 Labre Park
- 1.9 Parkwest Garage
- 1.10 Security Shredder
- 1.11 Bin Maintenance
- 1.12 REL Collections

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HSP 7.0 Provision of Safety Training, Awareness and Instruction

Thorntons Recycling is committed to providing appropriate health and safety training for all employees, which will be sufficient to meet the company's obligations under the Safety, Health and Welfare at Work Act, 2005 and other relevant legislation. The primary responsibilities for this rests with management in co-operation with specialists as appropriate and the Company expects that all employees will co-operate in any training provided.

All staff employed by Thorntons Recycling will receive induction training to ensure that they fully understand the hazards of the **equipment** and what safety precautions and emergency procedures are required. The training shall involve an introduction to the company's Safety Statement.

The Safety Representative, if/when appointed, will receive the necessary training as recommended by the HSA to carry out his/her role effectively. Training will be given, as necessary, to Management to ensure that they have the necessary skills and knowledge to organise the work safely without risk to health;

Training records will be maintained and will contain the following information:

- Date of instruction or exercise
- Duration
- Name of Instructor
- Name of person receiving instruction
- Nature and content of instruction

Additional training courses will be provided to meet specific needs as they arise from time to time. Such courses may be carried out in-house or at an appropriate outside agency. All employees are required to co-operate with the company in the implementation of its training programme.

The core topics of the induction training will include the following:

- Introduction to the Thorntons Recycling Safety Policy
- Smoking Policy
- Employee legal obligations – Duty-of-Care
- Emergency Procedures
- Accident / Incident Reporting
- Fire safety information
- Arrangements for First Aid
- Specific hazard awareness
- Material Safety Data Sheets
- General Site Safety Rules
- Personal Protective Equipment (PPE)
- Working at Heights
- Noise / Hand Arm Vibration Regulations

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Maintenance, Kilmainhamwood, Head Office, Projects,
Security Shredding

Page 18 of 54
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- Manual Handling
- Abrasive Wheels
- Bullying and Harassment Policy

All employees are **encouraged** to contact their supervisor or the health & safety manager if they require any training. Training is carried out in accordance with PM05, Training.

HSP 8.0 Provision of Practical and Safe Working Systems – (Operation Control)

It is the policy of Thorntons Recycling to ensure that tasks are within the competence and capacity of each employee and the systems of work will be designed with that purpose in mind. Systems of work include all routine work, maintenance work and work by contractors on site. They will include consideration for the safety and health of visitors/contractors.

Care must also be taken to comply with environmental and quality procedures that may also have an impact on the way a person is expected to undertake their work.

It is the policy of the company when purchasing new equipment, altering existing equipment or changing a system of work, to study such proposed purchases or changes to ensure so far as is reasonably practicable, that they are without significant hazard. Written safety instructions/safe operating procedures will be provided where necessary and included in this safety statement. Management will review systems of work on a regular basis as required, this will be carried out as part of the internal audit of the integrated management system.

The following are examples of activities where particular care is required and it is necessary for contractors to have a written Safe System of Work (Method Statements):

- Work involving hazardous substances.
- Storage and/or use of flammable liquids and materials.
- Noisy operations.
- Hot work.
- Major building operations covered by the construction regulations.
- Entry to confined spaces.
- Live work on electrical apparatus

HSP 9.0 Permit to work

Permits are used on the Thorntons Recycling sites to establish the essential precautionary measures to be implemented, whenever it is necessary for personnel to perform work in relation to Hot Works, Entry to Confined Space and Electrical / Mechanical Isolation. It is important that these permits are complied with at all times. Failure to do so may result in serious injury to personnel and / or damage to company property.

➤ **Hot Works**

A hot work assessment must be carried out and recorded. There is a dedicated hot works permit book which requires all contractors and employees to complete. This is operated by the Maintenance Department.

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Safety Statement and Health & Safety Management System of Thorntons Recycling

NOTE: Welding, Cutting, Grinding or any other type of heat producing task may alter the atmosphere, and have the potential to start a fire.

➤ **Confined Space Entry**

A confined space is defined as any location with difficult entry/exit, which is not intended for regular occupation, and which presents potential hazards (eg, engulfment, mechanical, electrical, etc) and/or atmospheric hazards (eg, oxygen deficient, toxic, or flammable). Any questionable area in excess of 1.5 metres deep (eg, tank, well, trench, or channel).

A confined space may include but not be limited to:

- 1/ Trommel Screens
- 2/ Baler Equipment
- 3/ Vibrating Feeders
- 4/ Storage Vessels

The Code of Practice for working in confined space must be complied with by the contractor or Thornton Recycling prior to the commencement of this scope of work.

➤ **Electrical / Mechanical Isolation**

Isolation of services (electrical, mechanical, chemical or gases) must be carried out whenever any work is to be undertaken. Each person shall place a **PERSONAL LOCKOUT DEVICE** on each service that may affect or have the potential to affect the work being undertaken.

➤ **Safe Systems of Work**

It is the policy of Thorntons Recycling to ensure that tasks are within the competence and capacity of the employee. The systems of work will be designed with that purpose in mind. It is clear that some processes necessarily give rise to risk that can only be controlled by adherence to proper procedures. The training provided for employees will identify the areas where care and skill must be exercised.

It is the policy of Thorntons Recycling, when purchasing new equipment, altering existing equipment, or changing a new system of work to study such proposed purchases or changes to ensure so far as is reasonable practicable, that they are without significant hazard. Systems of work include all normal production work, maintenance work, and office work, laboratory work and work by contractors on site.

They include consideration for the safety and health of visitors and customers. The Health & Safety Manager shall review departmental systems of work when notified on any significant change to operations in their area, or of any purchases/alterations of equipment within their area.

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Security Shredding

Page 20 of 54
REVIEW DATE: June 2011
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HSP 10.0 Provision of Personal Protective Equipment

The Health & Safety Manager is responsible for ensuring that an assessment of every task and workplace that exposes persons to significant risk of injury to determine whether or not PPE is required. The company will provide PPE not only that complies with legislation but also is CE marked and of good quality.

Suitability / Compatibility

The Health & Safety Manager is responsible for ensuring that all PPE is assessed for its suitability and compatibility.

Issue of PPE

The Health & Safety Manager or person designated is responsible for ensuring that all employees are issued with the correct PPE for the hazards they are exposed to and will issue it free of charge and before they are exposed to those hazards. The Matrix below details area and the type of PPE to be issued. All PPE will be issued through an employee's supervisor and must be signed for.

Maintenance / Replacement

The Health & Safety Manager, supervisor or person designated is responsible for ensuring that damaged or worn out PPE is replaced immediately and free of charge. Issue will normally be on a one for one basis to prevent abuse or unnecessary issue. PPE will be considered worn out when it no longer provides the protection that it was specified for.

Storage of PPE

All employees are responsible for ensuring that when not in use, PPE is stored adequately so that it's kept in good condition.

It is the policy of Thorntons Recycling to provide appropriate personal protective equipment and clothing and to replace it as required. The PPE issuing location is at each company facility and at the Thorntons Recycling Garage.

Responsibility for ensuring that the equipment is used properly rests with the supervisors who will ensure that all employees within their area of responsibility are properly instructed in the maintenance and use of protective clothing and safety equipment.

Through experience and on the advice of competent Health and Safety specialists, Thorntons Recycling has developed policies on the use of Personal Protective Equipment. It is the policy of Thorntons Recycling to provide the required protective equipment and to replace it on presentation of the worn or defective item. The Health & Safety Manager shall identify the appropriate protective equipment for tasks, which cannot be made safe by any other practicable means.

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Maintenance, Kilmainhamwood, Head Office, Projects,
Security Shredding

Page 21 of 54
REVIEW DATE: June 2011
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Safety Statement and Health & Safety Management System of Thorntons Recycling

The policy on the provision of Personal Protective Equipment will be regularly reviewed by Thorntons Recycling Health & Safety Manager and will be updated as required.

Helmets

Hard hats are supplied to all personnel and must be worn at all times within designated areas. The use of helmets on Thorntons Recycling sites is a requirement of law and is strictly enforced. Helmets that have been subject to impacts or any type of damage must be replaced immediately.



HEAD PROTECTION

Footwear

Safety boots, both rubber and leather, are fitted with steel toe caps and are supplied by the company. Other than for the initial issue of boots, you will be expected to produce the old ones in exchange for new boots.

Safety boots fitted with steel caps must be worn at all times on entering the Thorntons Recycling site, or sites under it's control.



FOOT PROTECTION

Gloves

Gloves should be worn wherever possible to prevent injury and chemical contact, or contact with hazardous waste. Various types of gloves are available and must be selected carefully to ensure the type used is suitable for the task, particularly if working with chemical products. Gloves that are no longer in use should be disposed of properly into rubbish bins. Do not leave them lying around the workplace.

Hearing Protection

Hearing protection should be worn in all designated areas. Workshop equipment, e.g.; grinders, produces very high noise levels, as do power generation equipment and the construction and demolition lines. Various types of hearing protection are supplied by the company. Regardless of the type used, pay particular attention to the hygiene aspects.



HEARING PROTECTION

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Security Shredding

Page 22 of 54
REVIEW DATE:
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Eye Protection

Eye protection should be worn in all designated areas. Personnel must wear safety glasses once they have entered the designated safety glasses work areas.



Respiratory Protection

The hazards posed by dust can usually be eliminated at its source by good management practices. Dust, where it is a problem can be protected against by the use of disposable dust masks. These masks are readily available as needed. The need for more specific types of respiratory protection for certain tasks, such as hazardous material handling are also readily available.



**BREATHING
PROTECTION**

Clothing

Close fitting clothing needs to be worn when working around machinery of any type.

Rain

Wet weather trousers and jackets with hoods are available from the store; Wellington's are available on request. Usage and replacement of Wellington's is the same as that of footwear.

Eye Wash Stations

Saline solutions are also available in all the first aid boxes located around the Thorntons Recycling Operations and in the First Aid Room located at the Killeen Road facility.

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Safety Statement and Health & Safety Management System of Thorntons Recycling

Personal Protective Equipment Matrix

Area/Activity	Overalls	Helmet	Eye protection	Steel toed boots	Hi-Vis Vest	Dust Mask	Hearing Protection	Gloves	Rain Jacket
Killeen Road									
Office									
C.I.D Line	√	√		√		√	√	√	
Dry Recycling	√	√		√	√		√	√	
Picking Line Recy				√	√			√	
Baler	√	√		√	√			√	√
Yard Staff		√		√	√		√	√	√
Supervisors	√	√		√	√				
Contractors (yard)		√		√	√				
PDM									
Picking Line		√	√	√	√	√	√	√	√
Equip. Drivers		√		√	√				
Dunboyne									
Segregation		√		√	√		√	√	
Equip. Drivers		√		√	√		√		
Kilmainhamwood	√			√	√	√	√	√	
Confidential Shredder Building	√			√	√	√		√	
ELV				√	√			√	
Operatives	√	√	√	√	√		√	√	√
Labre Park		√		√	√			√	
Tanker service									
Equip. Drivers		√		√	√		√		
Operatives	√	√	√	√	√	√	√	√	√

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 Maintenance, Kilmainhamwood, Head Office, Projects,
 Security Shredding

Page 24 of 54
 REVIEW DATE: June 2011
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HSP 11.0 Health Surveillance Policy

The intent of the Health Surveillance programme is to obtain sufficient information to make reliable medical judgement as to an employees, or prospective employees, physical and mental capability to perform their job assignment in a safe and healthy manner. It will also assist in determining the overall standard of health throughout the workforce.

This policy covers all employees.

The Human Resources (HR) and Health & Safety (H&S) Department will provide and manage the Health Surveillance Programme at Thorntons Recycling. The purpose of the Health Surveillance Programme will be as follows:

- a) To obtain baseline and ongoing health information on our employee population relative to their potential exposure to hazardous materials and physical agents in the workplace and to augment our occupational hygiene programme.
- b) To identify employees who are at risk, or potentially could be developing health problems which affect their ability to perform their jobs in a safe and healthy environment.
- c) To provide a vehicle for removal of an employee when surveillance results indicate an unacceptable risk in their capability to perform their job in a safe and healthy manner or interfere with the health & safety of a fellow employee.
- d) The pre-employment aspect of the programme will determine whether or not an employee is physically and mentally capable of performing the duties of their job without creating a hazard to their health or to other persons.
- e) To determine an employee or perspective employees capability of wearing the necessary personal protection equipment required for the job and any clothing required for protection.

All employment offers will only be made subject to the completion of a satisfactory medical examination. The pre-employment medical will consist of;

1. General health questionnaire,
2. Physical examination,
3. Height, weight, body mass index,
4. Standard urine check,
5. Full colour vision screen, colour vision,
6. Spirometry,
7. Skin questionnaire & examination,
8. Full audiometry.

The proposed Health Surveillance Programme will comply with the requirements of the Safety, Health and Welfare at Work Regulations (General Applications 2007).

All medical examinations will be carried out by a registered medical practitioner.

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Security Shredding

Page 25 of 54
REVIEW DATE: June 2011
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Safety Statement and Health & Safety Management System of Thorntons Recycling

The HR and H&S Department will be responsible for provision of the Health Surveillance Programme at Thorntons Recycling. The HR and H&S Department will liaise with the medical practitioner and decide what health surveillance is required for each employee.

The HR and H&S Department will ensure that management, employees and their representatives are adequately consulted and informed on arrangements for health surveillance and the collective results of surveillance (in a form that prevents individuals being identified).

The HR and H&S Department will make arrangements and provide the necessary facilities so that surveillance can be adequately carried out.

The HR and H&S Department will take appropriate action on the conclusions and results.

The HR and H&S Department will keep the health record on each employee who is subject to health surveillance.

The Human Resources Department will arrange for individual pre-employment medicals to be carried out in accordance with the provisions of the Health Surveillance programme in conjunction with the Health & Safety Department.

This process is managed in accordance with PM14, Resource Management.

HSP 12.0 Consultation, Participation and Communication

Thorntons Recycling is committed to meeting its obligations under *Part 4, Section 25, of the Safety, Health and Welfare at Work Act 2005* on consultation. The Company is committed to a policy of co-operation and consultation between management and staff and will take account of any representations made by staff members. The effectiveness of the consultation arrangements will be reviewed at regular intervals. Safety representatives will be nominated in each area and these safety representatives will together form a consultation group

Consultation will be held by a quarterly Safety Committee Meeting, chaired by the Health & Safety Manager. Health and Safety will also be an integral part of all management meetings occurring on a periodic basis.

The Safety Representative shall be the focal point for consultation. Safety representatives will be given access to information as is necessary to fulfil their function and will be notified of a Health and Safety Authority inspector visiting the premises to carry out an inspection. Safety representatives will not be placed at any disadvantage as result of fulfilling their role.

The effectiveness of the consultation arrangement will be reviewed from time to time. Thorntons Recycling recognises the statutory rights of a safety representative as set out in *Part 4, Section 25 (1), of the Safety Health and Welfare at Work Act, 2005*, and is committed to co-operating with that person selected.

REPRESENTATIVE	AREA REPRESENTED
Eamon Flanagan	Administration
Terry McGrath	KR Administration
David Duff	Killeen Road / ELV
Mercedes Kavanagh	Dunboyne / PDM
Eugene Doyle	Drivers & Driver Helper
Vali Jurjea	KR Yard

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Security Shredding

Page 26 of 54
REVIEW DATE: June 2011
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Safety Statement and Health & Safety Management System of Thorntons Recycling

Mark Reddin	Tanker Services
Tom McDonnell	Kilmainhamwood
Charlie Smullen	Garage & Bin Repair
Jim Brennan	Security Shredding

The Health & Safety Manager will be responsible for co-ordinating consultation with the work force and providing appropriate information to the work force and their nominated safety representatives on all matters pertaining to safety, health and welfare. The principal mechanism for consultation with the work force will be via the Safety Committee. The work force has been given an opportunity to nominate a number of safety representatives to that Safety Committee to cover each area.

The Safety Representative will be given access to any information in the possession of management that pertains to the safety, health and welfare of employees, subject to the exclusion of information relating to an individual, or information pertaining to taking or defending a legal case. The Safety representative will be given the opportunity to receive appropriate on-going training. In this respect, they will undertake a safety representative course, and will be given the option of undertaking further training if necessary.

The Safety Committee Representative will be informed when an Inspector of the Health and Safety Authority visits the site, and will be facilitated in every possible way with the discharge of their functions under *Part 4, Section 25(1)*, of the *Safety, Health and Welfare at Work Act, 2005*.

The Safety Representative will not suffer any disadvantage through the discharge of their function.

HSP 13.0 Welfare

The provision of welfare facilities required by legislation will be provided in accordance with the *Safety, Health and Welfare at Work (General Application) Regulations, 2007* and the *Safety, Health and Welfare at Work (Miscellaneous Welfare Provisions) Regulations, 1995*.

To ensure the continued welfare of employees, toilet and kitchen areas are provided, where necessary. Staff must co-operate in maintaining a high standard of hygiene in these areas.

Employees are reminded that:

- Any person who is under medical supervision, or on prescribed medication and who has been certified fit for work, should notify their supervisor of any known side effects or temporary physical disabilities, which could hinder their work performance and which may be a danger to either themselves or their fellow workers. Management will arrange to assign appropriate tasks for that person to carry out in the interim.

HSP 14.0 Alcohol & Drugs

The *Safety, Health & Welfare at Work Act, 2005*: Requires all employees to provide safe places of work and safe systems of work. This covers the management of staff such that they are not incapacitated by drugs or alcohol consumption to carry out their work without risk to others.

The *Road Traffic Act 1961 – 1995*: Renders it a criminal offence for a driver to be unfit through drugs and alcohol.

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Safety Statement and Health & Safety Management System of Thorntons Recycling

- Illicit drugs and alcohol - employees are not allowed to attend their workplace to carry out duties whilst under the influence of illicit drugs or alcohol. Any person found breaking this rule could be liable to disciplinary procedures.
- Any employee who in the opinion of Management shows apparent signs of the effects of intoxicating liquor or drugs, will be required to leave the Company premises immediately and will be asked to attend the company nominated medical doctor for a drug & alcohol test. If an employee is requested to leave the Company premises or has failed drug / alcohol test, disciplinary action will apply. This will only occur when a full investigation takes place.
- Employees required to leave the premises will forfeit payment for the remainder of the shift / day.

In the interest of Safety and Health, Thorntons Recycling reserves the right to carry out random Drug and Alcohol tests on any of its employees on any of its operations at any time.

HSP 15.0 Bullying / Harassment Policy

Thorntons Recycling is committed to providing all of its employees with an environment free from bullying/harassment. This policy is designed to prevent bullying /harassment, identify what behaviours constitute bullying/harassment and also to give the Company's procedures for investigating any allegation.

All employees will be expected to comply with this policy and management will take appropriate measures to ensure that bullying/harassment does not occur. Appropriate disciplinary action, including dismissal for serious offences, will be taken against employees who violate this policy.

In accordance with the general duties in Part 2 General Duties, of the Safety, Health and Welfare at Work Act, 2005, and Section 12 of the Employment and Equality Act 1989 and the Report of the Task Force on the Prevention of Workplace Bullying, H.S.A., 2001 an anti-bullying/harassment policy is in place.

This policy applies to employees both in the workplace and at work-associated events such as meetings, conferences and work-related social events, whether on the premises or off-site.

This policy applies to bullying/harassment, not only by fellow employees but also by clients, customers, owner drivers or other business contacts to which an employee might reasonably expect to come into contact with in the course of their employment.

DEFINITION OF BULLYING

Workplace bullying is defined as *"repeated inappropriate behaviour, direct or indirect, whether verbal, physical or otherwise, conducted by one or more persons against another or others, at the place of work and/or in the course of employment which could reasonably be regarded as undermining the individual's right to dignity at work"*.

An isolated incident of the behaviour described in this definition may be an affront to dignity at work but as a once off incident, is not considered to be bullying.

Bullying can include conduct offensive to a reasonable person, e.g. oral or written slurs, physical contact, gestures, jokes, displaying pictures, flags/emblems, graffiti or other material which state/imply prejudicial attitudes which are offensive to fellow employees.

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Security Shredding

Page 28 of 54
REVIEW DATE: June 2011
ALL OTHER PAPER COPIES ARE UNCONTROLLED.

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Safety Statement and Health & Safety Management System of Thorntons Recycling

Examples of bullying behaviour can also include:

- Personal insults and name calling
- Persistent unjustified criticism and sarcasm
- Public or private humiliation
- Shouting at staff in public and/or private
- Sneering
- Instantaneous rage, often over trivial issues
- Unfair delegation of duties and responsibilities
- Setting impossible deadlines
- Unnecessary work interference
- Making it difficult for staff to have access to necessary information
- Aggression
- Not giving credit for work contribution
- Continuously refusing reasonable requests without good reasons
- Intimidation and threats in general.

DEFINITION OF HARASSMENT

Harassment on the grounds of marital status, family status, race, age, religious belief, sexual orientation, disability or membership of the travelling community is defined as "any unwanted conduct which has the purpose or effect of violating a persons dignity and creating an intimidating, hostile, degrading, humiliating or offensive environment for the person".

Harassment occurs if any person feels intimidated, humiliated, patronised or embarrassed by the derogatory, offensive or discriminatory remarks or actions of others. Harassment may interfere with job performance, undermine job security or create a threatening or unpleasant work atmosphere.

Racial harassment is unwanted behaviour of a racial nature by one employee towards another

The unwanted conduct may consist of acts, requests, spoken words, gestures or the production, display or circulation of written words, pictures or other material.

Examples of Racial Harassment include:

- Abusive language, mockery or racist jokes
- Display or circulation of racially offensive material
- Racial name calling
- Unfair allocation of work duties
- Intrusive or persistent questioning about a person's racial or ethnic origin, culture or religion
- Exclusion from normal workplace conversation or social events i.e. frozen out.

DEFINITION OF SEXUAL HARASSMENT

Sexual harassment is "any form of verbal, non-verbal or physical conduct of a sexual nature which has the purpose or effect of violating a person's dignity and creating an intimidating, hostile, degrading, humiliating or offensive environment for the person".

Sexual harassment is unwanted behaviour of a sexual nature by one employee towards another.

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Safety Statement and Health & Safety Management System of Thorntons Recycling

The unwanted conduct may consist of acts, requests, spoken words, gestures or the production, display or circulation of written words, pictures or other material.

Examples of sexual harassment can include:

- Sexual gestures
- Displaying sexually suggestive objectives, pictures, calendars
- Sending suggestive and pornographic correspondence including faxes, text, messages or e-mails
- Unwelcome sexual comments and jokes
- Unwelcome physical conduct such as pinching, unnecessary touching, etc.
- Same sex sexual harassment

COMPLAINTS / INVESTIGATION PROCEDURE

The investigation will be conducted in accordance with Thorntons Recycling Bullying Prevention Policy which incorporates the HSA Code of Practice for Employers and Employees on the prevention and resolution of Bullying at Work.

All investigations will be conducted thoroughly and will be completed as quickly as possible; an indicative time frame will be discussed at the beginning of investigation and agreed.

Statements from all parties involved will be in writing. Copies of the record of their statements will be given to and agreed with those who make statements to the investigator. All parties should continue to work normally, if possible during the investigation. The objective of an investigation is to ascertain whether or not, on the balance of probabilities, the behaviours complained of occurred. Evidence and witness statements are relied on for this purpose.

The Investigation will be conducted by either a designated member of management or, if necessary, an agreed, external third party. In either case, the designated person will have appropriate training and experience and be familiar with the procedures involved. The investigation will be conducted thoroughly, objectively, with sensitivity, utmost confidentiality, and with due respect for the rights of both the complainant and the person complained of.

The investigator will meet with the complainant and the person complained of and any witnesses or relevant persons on an individual confidential basis with a view to establishing the facts. A work colleague or an employee may accompany the complainant and the person complained of, if so desired.

The investigation will be completed as quickly as possible, preferably within an agreed timeframe. The investigator will submit the report to the employer which will include their conclusions. The complainant and the person complained of will be given a copy of the report as soon as possible by the employer and given an opportunity to comment, within a set deadline, before the employer decides on any action to take.

There is both an informal and formal procedure to deal with the issue of bullying /harassment at work.

Informal Procedure

It is often preferable for all concerned that complaints of bullying or harassment are dealt with informally, whenever possible. This is likely to produce solutions that are speedy, effective and minimise embarrassment and the risk of breaching confidentiality. Thus, in the first instance an employee who believes that they are the subject of bullying/harassment should ask the person responsible to stop the offensive behaviour.

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Maintenance, Kilmainhamwood, Head Office, Projects,
Security Shredding

Page 30 of 54
REVIEW DATE: June 2011
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Safety Statement and Health & Safety Management System of Thorntons Recycling

If an employee finds it difficult to approach the alleged perpetrator directly, they should seek help and advice on a confidential basis from the Human Resources Manager. At this stage, the role of Human Resources is not to judge, but rather to provide advice and assistance about what the company's policy states.

Having consulted with the Human Resources Manager, the complainant may request the assistance of a manager/supervisor in raising the issue with the alleged perpetrator(s). In this situation the approach of the manager/supervisor should be by way of a confidential, non-confrontational discussion with a view to resolving the issue in an informal low-key manner.

A complainant may decide, for whatever reason, to bypass the informal procedure. Choosing not to use the informal procedure will not reflect negatively on a complainant in the formal procedure.

It is recognised that it may not always be practical to use the informal procedure, particularly where the bullying or harassment is serious or where the people involved are at different levels within the organisation. In such instances, the employee should use the formal mechanism set out below.

Formal Procedure

When a formal complaint is being made, the employee should contact their supervisor/manager as soon as possible.

If this is inappropriate, the employee should contact the Human Resources Manager.

The complainant will be subject to an initial examination by the Human Resources Manager, with a view to determining an appropriate course of action. An appropriate course of action at this stage, for example, could be exploring a mediated solution, or a view that the issue can be resolved informally. Should either of these approaches be deemed inappropriate or inconclusive, a formal investigation of the complaint will take place with a view to determining the facts and the credibility or otherwise of the allegation(s).

In the interests of natural justice the alleged bully or harasser will be notified in writing of the nature of the complaint, given a copy of the allegation, informed of his or her right to representation and will be given every opportunity to rebut the detailed allegations made.

Whilst it is desirable to maintain utmost confidentiality, once the investigation of an issue begins, it may be necessary to interview other staff. If this is so, the importance of confidentiality will be stressed to them. Any statements taken from witnesses will be circulated to the person making the complaint and the alleged bully/harasser for their comments, before any conclusion is reached in the investigation.

When the investigation has been completed, both parties will be informed as to whether or not the complaint has been upheld.

Both parties will be given the opportunity to comment on the findings before any action is decided upon by management.

All complaints received will be treated seriously, confidentially and dealt with as soon as is practicable.

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<i>CONTROLLED DOCUMENT IS ON THE INTRANET AT: X Drive/IMS/Procedures/HSP</i> <i>ALL OTHER ELECTRONIC COPIES ARE UNCONTROLLED.</i>	

Safety Statement and Health & Safety Management System of Thorntons Recycling

Strict confidentiality and proper discretion will be maintained, as far as is possible, in any necessary consultation to safeguard both parties from innuendo and harmful gossip.

A record of all relevant discussions which take place during the course of the investigation will be maintained by Human Resources.

Both parties will be given an opportunity to comment on the conclusions of the investigation team. Both parties will be given a copy, in writing, of the conclusions reached by the investigating team.

Appeal

Either party can appeal the decision of the formal investigation in writing within 5 working days. If the full utilisation of the range of available internal procedures has not resolved a bullying complaint, the services of a Rights Commissioner may be accessed directly by the individuals involved. The Rights Commissioner will assess how the procedures were applied in the bullying case and thereafter intervene in a range of ways, including, where appropriate, carrying out a new investigation. Application for a Rights Commissioner hearing must be made directly by the appellant, citing Industrial Relations Acts 1969-2001. Application forms for such hearings are available on-line (www.lrc.ie) or by request from the Labour Relations Commission. Findings of Rights Commissioners which are delivered in the form of a recommendation, can be appealed to the Labour Court.

Action Post Investigation

Where a complaint is upheld in a formal investigation, a disciplinary hearing will take place. The disciplinary action to be taken will be in line with the company's disciplinary policy. Should a case of bullying or harassment be proven, then the Company will take appropriate disciplinary action. This can include a warning, transfer, demotion or other appropriate action, up to and including dismissal.

Records of any warnings for bullying/harassment will remain in the employee's file and will be used in determining what disciplinary action is to be taken, if any further offences of the same or similar nature occur in the future.

Regular checks will be made by one of the investigators to ensure that the bullying/harassment has stopped and that there has been no victimisation for referring a complaint in good faith. Retaliation of any kind against an employee for complaining or taking part in an investigation concerning bullying/harassment at work is a serious disciplinary offence.

Malicious Complaints

If a complaint is found to be malicious, appropriate disciplinary action will be taken, up to and including dismissal.

Further Information

All questions relating to the execution or interpretation of this policy should be

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Killeen Road, Garage, Dunboyne, ELV, PDM, WEEE, Bin
Maintenance, Kilmainhamwood, Head Office, Projects,
Security Shredding

Page 32 of 54
REVIEW DATE: June 2011
ALL OTHER PAPER COPIES ARE UNCONTROLLED.

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referred to the Human Resources Manager.

HSP 16.0 Stress Policy

Thorntons Recycling adheres to all aspects of the *Safety, Health and Welfare at Work Act, 2005*, which obliges employers to identify and safeguard against ALL risks to health and safety, including stress. Thorntons Recycling is committed to providing a safe and healthy working environment that supports the physiological and physical well being of all staff. The purpose of this policy is to ensure that the Company is in compliance with our statutory and common law duties and more generally to recognise that a safe and healthy working environment contributes to the motivation, job satisfaction, performance and creativity of all staff.

Specifically the Company is committed to the promotion of health, to the prevention of work related stress and to the provision of support to any member of staff that may suffer stress. Whilst the Company has no control over external or personal factors, it is committed, where possible, to assist employees in achieving a good work life balance.

This stress policy will apply to all employees of Padraig Thornton Waste Disposal Ltd t/a Thorntons Recycling.

Work related stress is a growing problem in our modern work environments and is being felt by more and more people each year. A likely reason for this is that work has become more intense over the last number of years. This has been as a result of increased competitiveness, technological advances, the growing use of incentives linking effort to pay and worries about job security.

However, a differentiation should be made between pressure and stress. An individual may be well adapted to cope with a short term exposure to pressure, which can be considered as positive. However, if this exposure is prolonged or becomes more intensive and the individual feels that they do not have the necessary coping resources this may lead to stress, reduced effectiveness at work and ill health. Different individuals react differently to similar situations and the same individual can react differently at different times of his / her life.

Stress can be defined in many ways but essentially it occurs when an individual perceives an imbalance between the demands placed on them on the one hand, and their ability to cope with those demands on the other. It can be accompanied by physical, psychological or social complaints or dysfunctions.

The Health and Safety Authority define Stress as "a negative reaction to pressure, accompanied by fear of not coping, loss of control and lack of support. It is a physical and emotional experience and involves increases in blood pressure, hormone activity, digestive disturbance and sleep patterns. Thoughts are also affected and mood and behaviour."

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Security Shredding

Page 33 of 54
REVIEW DATE: June 2011
ALL OTHER PAPER COPIES ARE UNCONTROLLED.

CONTROLLED DOCUMENT IS ON THE INTRANET AT: X Drive/IMS/Procedures/HSP
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Safety Statement and Health & Safety Management System of Thorntons Recycling

Stress can be initiated by such things as long working hours, the level of work intensity, a person's status in the workplace, noise, glare, high absenteeism or turnover, interpersonal conflicts, work organisation/processes (degree of autonomy, match between skills and job requirements), working conditions and environment, communication (uncertainty about expectations, prospects, change), emotional and social pressures (perceived lack of support).

Employees may begin to display emotional effects such as insomnia, lethargy, increased irritability or anger, anxiety or feelings of panic, fear, tearfulness, negative self statements, increased interpersonal conflicts. Physical symptoms include racing heart, cold sweaty hands, headaches, back or muscular pain, weight changes and erratic breathing. Psychological responses may include poor concentration, difficulty making decisions and generally working below standard.

For an organisation, high levels of stress can lead to increased absenteeism, low motivation, reduced productivity and efficiency, faulty decision making, resistance to change and a poor employee relations environment.

Stress that originates outside the working environment can lead to changes in behaviour and reduced effectiveness in work. While Thorntons Recycling can not prevent ill-health caused by stress due to problems outside work, e.g. financial or domestic worries, non-work pressures can make it difficult for staff to cope with work and, consequently, their performance at work might suffer. Therefore, we are prepared to be understanding to staff in this position in an effort to improve the employee's well being overall.

The Management of Stress

Thorntons Recycling maintains a strong focus on health and safety management across all aspects of the Company. In line with this, Stress has been identified as a potential hazard in our workplace. As with any physical hazard the Company is committed to assessing the working environment for systems and practices that may lead to stress and to put in place preventative measures. Risk management is a structured step by step problem solving approach involving participation and consultation.

Thorntons Recycling will conduct the risk assessment on stress as follows:

- Identify the hazards (causes of stress) – what are the aspects of your organisation that have the potential to cause stress.
- Assess the risks – prioritise them according to severity and likelihood of negative outcome.
- Eliminate the risks – change the system so that the stressful aspect of work is eliminated.
- Contain the risks – limit the impact of and/or reduce the number of causes of stress.
- Protect from the risks – reduce the degree of exposure to the factors that cause it.

Safeguarding health and safety from the effects of stress is based on the same approach as that of any other hazard:

- Identification of potential problems
- Assessment of risks
- Implementation of safeguards
- Monitoring the effectiveness of safeguards.

Thorntons Recycling will utilise the following methods of managing stress:

CUSTODIAN: Health & Safety Manager CONTROLLED PAPER COPIES: Health & Safety Dept., Killeen Road, Garage, Dunboyne, ELV, PDM, WEEE, Bin Maintenance, Kilmainhamwood, Head Office, Projects, Security Shredding	Page 34 of 54 REVIEW DATE: June 2011 ALL OTHER PAPER COPIES ARE UNCONTROLLED.
CONTROLLED DOCUMENT IS ON THE INTRANET AT: X Drive/IMS/Procedures/HSP ALL OTHER ELECTRONIC COPIES ARE UNCONTROLLED.	

Safety Statement and Health & Safety Management System of Thorntons Recycling

- Ensure that Management is aware of the potential causes of stress and the early warning signs
- Ensure that all complaints that may be related to stress are listened to and appropriate measures taken.
- Where Management/Supervisors are aware that a workload or conditions of work are particularly stressful, measures should be taken to reduce the workload or improve conditions.

In line with legislation both Statute and Common law employees also have an obligation to take care of their own health and safety whilst at work. The Company will undertake its responsibilities as required. However, the effectiveness of this policy will largely depend on the cooperation of both the individual and Thorntons Recycling in ensuring the correct management of Stress in the workplace.

Preventing stress

Thorntons Recycling will foster a co-operative and supportive environment for all its staff. This will be assisted by ensuring good communications within teams, by conducting a full review of all new roles and responsibilities to ensure clarity through risk assessments and training. All staff is welcome to report excessive workloads, interpersonal pressures and symptoms of stress without fear of discrimination. All staff members have a part to play in recognising the signs of stress among our colleagues and taking action to provide appropriate intervention and support. We are committed to supporting staff in recovering from stress-related illnesses and managing the return to work after any period of sick leave so that stress does not reoccur.

Detecting and addressing stress

The Company will take reasonable action to combat and prevent workplace stressors identified through risk assessment or those raised by members of staff. We will increase general awareness of stress and methods to prevent and combat harmful, excessive workplace stressors in various ways, including training. We will assist staff in any way that we can in managing stress in others and themselves. We will manage problems that do occur in a systematic and confidential manner. We will manage the return to work of anyone that has been absent with work related stress problems.

Monitoring effectiveness

The risk assessment process forms part of the Company Safety Statement and will be reviewed at regular intervals to ensure the effectiveness of any anti-stress measures that have been put in place. In addition to stress indicators such as excessive absence or high labour turnover will be evaluated as part of these reviews.

Responsibilities

Managers

- Line managers should be alert to the risk of work-related stress in their staff and to signs of adverse reactions in individuals. This awareness will prompt them to take remedial action. Their responsibilities are to:
- Liaise with the Health & safety department in the regularly conducting appropriate risk assessments.
- Implement actions arising out of risk assessments
- Ensure good communication especially where there are organisational or procedural changes
- Ensure staff understand and, if necessary, are trained to perform their roles and, as appropriate, encouraged to develop further

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Killeen Road, Garage, Dunboyne, ELV, PDM, WEEE, Bin
Maintenance, Kilmainhamwood, Head Office, Projects,
Security Shredding

Page 35 of 54
REVIEW DATE: June 2011
ALL OTHER PAPER COPIES ARE UNCONTROLLED.

CONTROLLED DOCUMENT IS ON THE INTRANET AT: X Drive/IMS/Procedures/HSP
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Safety Statement and Health & Safety Management System of Thorntons Recycling

- Monitor workload, working hours, annual leave and sickness absence to ensure that staff are not overloaded
- Ensure that bullying and harassment is not tolerated.
- Offer support to any member of staff who is experiencing stress outside the workplace
- As part of the monitoring process, conduct return to work interviews with staff when they resume work after any period of sick leave and exit interviews with staff that are leaving

Staff

- All staff has an individual responsibility to minimise the risk of any kind of harm to themselves and their colleagues and to co-operate with the Company in its efforts to manage work-related stress.
- Staff must co-operate with their Managers to reduce hazards that may affect their physical and/or mental well-being, including attending any training provided and following guidance regarding work-related hazards.
- Where an individual believes they are at significant risk of work-related stress, then they should inform their Manager in confidence so that appropriate steps can be taken to reduce the risk. Other sources of support to which they can turn if they feel they cannot speak to their manager for any reason include the Health & Safety Manager, Human Resources, as appropriate, who will facilitate early support or intervention.
- Staff must recognise their own training and development needs
- Staff should be aware that a healthy lifestyle supported by an appropriate work-life balance is an important contribution to a person's well-being.

HR / H&S

- Give guidance to Managers on the stress policy
- Monitor the success of the stress policy by providing and analysing sickness absence and labour turnover statistics and conducting surveys of staff attitudes
- Provide support to managers and staff, through provision of written guidance and training
- Provide assistance in managing individual cases of stress and advice on stress prevention
- Ensure that the stress policy is implemented

IMPLEMENTATION

This policy will be communicated throughout the organisation and all employees will be made aware of their responsibilities to create a positive working environment where employees are supported in their roles. This policy will form part of the induction process and appropriate training will be given to all Managers to enable them to communicate the policy to staff and to deal with complaints. Progress on the implementation and effectiveness of the policy will be regularly monitored and reviewed at local level.

In each site the most senior manager is responsible for ensuring that all the above-mentioned practices are conducted in an equality friendly manner in conjunction with company policy and procedures. Human Resources together with the relevant Managers are responsible for constant monitoring of this policy in action and addressing any issues that arise.

REDRESS

It is recognised that the principal responsibility for promoting a healthy and safe environment which fosters a culture of trust, co-operation and mutual respect lies with the Company. Each manager and employee is required to be familiar with and to comply with the Stress policy and must comply with the spirit of helping each other.

CUSTODIAN: Health & Safety Manager
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Killeen Road, Garage, Dunboyne, ELV, PDM, WEEE, Bin
Maintenance, Kilmainhamwood, Head Office, Projects,
Security Shredding

Page 36 of 54
REVIEW DATE: June 2011
ALL OTHER PAPER COPIES ARE UNCONTROLLED.

CONTROLLED DOCUMENT IS ON THE INTRANET AT: X Drive/IMS/Procedures/HSP
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Should employees feel that they are experiencing stress they may invoke the Company Grievance Procedure. Should any employee intentionally act in contravention of the Company's Stress policy, they may be subject to disciplinary action under the Company's Disciplinary Procedure up to and including dismissal. Please refer any queries regarding this policy to your respective Manager or the Human Resources Department.

HSP 17.0 Smoking Policy

It is the objective of Thorntons Recycling to take as far as is reasonably practical, all reasonable steps to safeguard the health, safety and welfare of all employees and to meet or exceed all relevant safety regulations and legislative requirements. In accordance with this objective Thorntons Recycling will protect all employees from the discomfort and health risks associated with passive smoking.

No smoking is allowed in any enclosed area of the workplace. This policy is in accordance with *The Public Health (Tobacco) Acts, 2002 & 2004 – Section 47, Smoking Prohibitions*.

The nature of our business would classify us as high risk and in the interests of safety, smoking as a risk must be prohibited.

- (i) It will be the responsibility of all employees to adhere strictly to the company's rules governing smoking.
- (ii) Management and supervisors must implement and safeguard the company rules on smoking in a uniform way.
- (iii) Failure of any employee to comply with the Smoking Policy will leave that employee open to disciplinary action in accordance with company disciplinary policy.

Smoking shall not be permitted at any location in the following areas:-

- All Offices, Tea Rooms, Control and Electrical Rooms and training Areas.
- All Toilets, Washrooms and Change rooms.
- Any of the sheds on any of the sites under the control of Thorntons Recycling.
- Any area designated as Non Smoking by the use of signs and or designated by site management.

All NO SMOKING signs are to be observed at all times.

Any employee found to be smoking and in breach of this regulation will face disciplinary measures and may be liable to instant dismissal.

There is a designated smoking area provided for those who wish to smoke at break times –

CUSTODIAN: Health & Safety Manager CONTROLLED PAPER COPIES: Health & Safety Dept., Killeen Road, Garage, Dunboyne, ELV, PDM, WEEE, Bin Maintenance, Kilmainhamwood, Head Office, Projects, Security Shredding	<i>Page 37 of 54</i> <i>REVIEW DATE:</i> June 2011 <i>ALL OTHER PAPER COPIES ARE UNCONTROLLED.</i>
CONTROLLED DOCUMENT IS ON THE INTRANET AT: X Drive/IMS/Procedures/HSP ALL OTHER ELECTRONIC COPIES ARE UNCONTROLLED.	

It is located at the entrance to stairway at bottom of canteen area.

HSP 18.0 Pregnant Employees

The company adheres to the provision of the *Safety, Health and Welfare at Work (Pregnant Employees etc.) Regulations, 2000. (SI 218/2000)*.

These regulations apply to employees that are pregnant, have just had a baby or are breast-feeding (within the first 26 weeks after birth). The following hazards must be considered: Pregnancy should be reported by the employee to their manager as soon as possible, the manager must then report the pregnancy to the Health & Safety Manager. If Management is notified of any of the above, an assessment of any hazardous activities relating to the employee will be carried out.

- Physical shocks, including direct blows to the abdomen.
- Handling a load.
- Movement and postures, which are abrupt or severe, or give, rise to excessive fatigue.
- Non-ionising radiation.
- Chemicals: (In particular any chemical which is harmful by inhalation or when absorbed through the skin, i.e. organic solvents).

A pregnant employee must not be exposed to these hazards unless they are adequately controlled. Adequate control means:

- The hazard is reduced to a level, which will not harm the pregnant woman or the developing child or breast-fed child.
- If any of these risks are present they must either be eliminated or safeguards put in place to protect the employee's health and safety.

These safeguards include:

- Changing the type of work, working hours, etc.
- Moving the employee to other safe work.

If these safeguards are not possible then the employee must be granted safety and health leave. This is paid leave, which continues until either the conditions change or else the pregnant employee becomes eligible for paid maternity leave.

Pregnant women and nursing mothers will have the facility to a rest area if necessary.

HSP 19.0 First Aid

The provision of first aid equipment required by legislation will be provided in accordance with *First Aid Regulations 1993*, contained in *Part IX of the General Application Regulations 1993*. Thorntons Recycling is committed to having an adequate number of persons who are qualified to administer first aid.

First Aid Boxes are located in appropriate location throughout the workplace; the names of the first aiders are available beside all the first aid boxes on the premises. In Killeen road the names of first aiders are on the entrance door to the First Aid Room.

CUSTODIAN: Health & Safety Manager CONTROLLED PAPER COPIES: Health & Safety Dept., Killeen Road, Garage, Dunboyne, ELV, PDM, WEEE, Bin Maintenance, Kilmainhamwood, Head Office, Projects, Security Shredding	<i>Page 38 of 54</i> <i>REVIEW DATE:</i> June 2011 <i>ALL OTHER PAPER COPIES ARE UNCONTROLLED.</i>
CONTROLLED DOCUMENT IS ON THE INTRANET AT: X Drive/IMS/Procedures/HSP ALL OTHER ELECTRONIC COPIES ARE UNCONTROLLED.	

Safety Statement and Health & Safety Management System of Thorntons Recycling

These boxes are there to be used for First Aid purposes - **'use them but do not abuse them'**. If you see that certain items are missing or in short supply, inform your supervisor so that they can arrange for replenishment.

All injuries must be reported, if you use the First Aid box for any reason, record the usage and make sure you report the injury to the supervisor.

Following an accident requiring first aid treatment, an accident report form is completed. In the event of a serious injury the ambulance service must be called, the Managing Director and/or Site Manager notified and a full accident investigation carried out.

A check will be carried out regularly to identify any replacement stocks needed. Following this check, a list of stock required will be purchased. The restocking of the first aid boxes will be the responsibility of the Health & Safety Manager.

FIRST AID ROOM

The First Aid Room is located in the Administration building at the Killeen Road site. This room is to be used only in an emergency. Throughout the workplace there are First Aid boxes which are kept up to date and fully stocked at all times.

In the event of an emergency outside of normal shift hours, there are a number of qualified first aiders on site. If a Doctor is required the shift supervisor will be responsible for calling the Doctor out. A list of First Aid trained personnel is available in all tearooms.

NOTE:

Other than in an emergency, employees must contact their Supervisor before seeking medical attention outside of the workplace for a work-related injury.

HSP 20.0 Emergency / Fire Procedures

Emergencies identified include fire, gas leak, and bomb scare. A comprehensive emergency plan exists for all of Thorntons Recycling operations and should be studied by all Thorntons Recycling employees. The emergency plan will be reviewed periodically and amended where necessary. All emergency exits are clearly marked and should be kept unobstructed at all times.

Evacuation drills will take place at least once a year or more often if required in all areas of Thorntons Recycling. Employees are reminded to familiarise themselves with the procedures so that a fast and effective evacuation of the premises can be completed in the event of an emergency. After each evacuation a review will be carried out to evaluate procedures and carry out any remedial action deemed necessary. Visitors and contractors will be informed on evacuation emergencies.

Fire Marshals / Wardens have been trained and appointed. Meetings will be held regularly to review safety procedures. Lists of the Marshals / Wardens will be displayed in appropriate locations around the workplace.

New employees will receive basic training from the Health and Safety Manager and all employees will be instructed on the following:

CUSTODIAN: Health & Safety Manager CONTROLLED PAPER COPIES: Health & Safety Dept., Killeen Road, Garage, Dunboyne, ELV, PDM, WEEE, Bin Maintenance, Kilmainhamwood, Head Office, Projects, Security Shredding	Page 39 of 54 REVIEW DATE: June 2011 ALL OTHER PAPER COPIES ARE UNCONTROLLED.
CONTROLLED DOCUMENT IS ON THE INTRANET AT: <i>X Drive/IMS/Procedures/HSP</i> ALL OTHER ELECTRONIC COPIES ARE UNCONTROLLED.	

Safety Statement and Health & Safety Management System of Thorntons Recycling

- Policy on smoking, electrical equipment, etc.
- How to raise the alarm.
- Actions to be taken on discovering a fire.
- How to call the fire brigade.
- Location and use of escape routes.
- The evacuation procedure.
- Assisting disabled people, visitors and others during evacuation
- Location and use of fire extinguishers.

A Fire Register is kept by Thorntons Recycling and is the responsibility of the Health and Safety Manager. The fire register will include company details, specific duties for members of staff, a log of fire procedure notices and fire drills, an inventory of fire fighting equipment, details of the fire alarm system, a record of staff instruction/training and a maintenance/test/inspection schedule.

List of Emergency phone numbers

Ambulance	999
Gardaí	999
Fire	999
ESB	1850-372-999
Gas (Leaks etc)	1850-200-550

HSP 21.0 Fire Equipment

Fire extinguishers are provided and correctly located to meet safety requirements. These appliances are provided to deal with incipient fires. Trained personnel using these appliances should only tackle small fires.

All fire fighting equipment is tested and serviced annually by specialised contractors. In accordance with the recommendation of the appropriate Irish Standard for fire equipment, 20% of extinguishers will be discharged each year and relevant employees trained in the safe and efficient use of the equipment.

Fire extinguishing appliances are readily identified, with easy access and must be unobstructed at all times. The appliances must not be interfered with in any way.

The location of fire extinguishers (fire points) must be clearly visible throughout the premises.

HSP 22.0 Accident/Incident Reporting

All accidents to a person, whether or not in the employment of the company, resulting in injury, however slight, must be reported to and recorded by the Supervisor involved and the appropriate accident reporting form filled out and a copy sent to the Health and Safety Manager within 24 hours.

An Accident Report form is available for this purpose and must be completed by the immediate superior of the person(s) involved in the accident.

This is necessary to monitor the progress of safety standards and to ensure that proper medical attention is given where required and as an aid in the identification of hazards so that the appropriate measures can be taken to prevent the accident from re-occurring.

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Safety Statement and Health & Safety Management System of Thorntons Recycling

Where an accident investigation is necessary, all employees are obliged to co-operate fully with such an investigation and to provide any information, which may be useful in establishing the circumstances leading up to the accident. All accidents investigated will have the investigation carried out by the supervisor and in consultation with Health and Safety Manager and a written report shall be prepared.

If an employee is absent from work for more than three calendar days due to an industrial injury or illness, it is a statutory requirement (S1 No. 44. 1993) that formal notice is given to the Health & Safety Authority on the appropriate form 'IR.1' (available on www.hsa.ie).

All notification of accidents or dangerous occurrences to the enforcement authority of the HSA will be completed by the Health and Safety Manager.

HSP 23.0 Working with Hazardous Materials

Hazardous Materials are used in every area of the Thorntons Recycling operation. Some are instantly recognisable as hazardous. Others, often used as part of a formula in paints, solvents etc. are not so well known. It is important that before using any hazardous material, you understand its properties and what personal protective equipment is required.

A Hazardous Materials Register containing the Material Safety Data Sheets (MSDS), for all the hazardous materials used within Thorntons Recycling operations are kept in the following locations:-

- Killeen Road Workshops
- Park West Office
- Park West Garage
- Dunboyne
- PDM /ELV/ Labre Park
- Health & Safety Managers Office
- Kilmainhamwood
- Security Shredding Facility

MSDS are provided for all employees who are required to work with hazardous materials. All hazardous materials on company property require an MSDS. An MSDS provides a large amount of information on the hazardous material, which is often much more detailed than the information given on package labels. Material Safety Data Sheets are alphabetically filed. The correct MSDS can easily be located, since the name on the correct data sheet, will be identical to the product name on the container label.

Control of Hazardous Materials at Thorntons Recycling

Engineering Controls

Thorntons Recycling aims to prevent hazardous exposures, fire and other problems that can result from improper use of hazardous materials. We accomplish this with exhaust ventilation, closed systems, automatic shut offs and safety interlocks. These are all examples of engineering controls, and are the primary and most cost effective method of controlling hazardous materials.

Personnel Protective Equipment

When engineering controls do not fully control the hazard or are not practical, PPE must be used. Examples are safety glasses, gloves and respirators.

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Safety Statement and Health & Safety Management System of Thorntons Recycling

Safe Working Procedures

Even with proper work equipment, engineering controls and the wearing of PPE, you must follow the safe work procedures/method statement and or conduct a risk assessment of the task to ensure that you are working in the correct and safest way.

Job and safety requirements are detailed /spelled out in procedures and specifications, which detail/identifies the correct way to perform a task both efficiently and safely. Hazardous Material labels and MSDS's contain valuable information on the hazards and precautions to be taken when handling and working with hazardous materials.

Points to remember

No new chemical may be introduced to Thorntons Recycling operations, unless an application accompanied by the relevant MSDS Sheet, is submitted to the Health and Safety Manager for approval to purchase and use on site, in accordance with company procedure.

It is an employee's responsibility to locate and read a data sheet, **before** handling a substance, if the labelling instructions are inadequate or you do not understand them.

If you have any trouble in using the Register ask your supervisor for assistance.

If you find a hazardous material that has somehow slipped through, inform your supervisor so that an MSDS Sheet can be obtained.

It is also a good idea to get into the habit of reading the labels on products as guide lines for safe use will be found on them.



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Page 42 of 54
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Hazardous Material Emergency

Chemical contact with eyes or skin can cause serious injury quickly. It is therefore very important that you act quickly to prevent further serious injury. Safety showers and eye wash stations are located around the plant and it is important that you become familiar with their location.

Chemical contact with the eye.

- Go to eyewash station immediately.
- Flush both eyes for a minimum of **15 minutes**.
- Hold eyelids apart with your finger & thumb while rinsing the eye flush the entire surface especially the lower lid.
- Get someone to call first aid and your supervisor.

Chemical contact with the skin.

- Rinse the affected area for a minimum of **15 minutes**.
- If clothing has been contaminated, remove all clothing and remain under the shower.
- Get someone to call first aid and your supervisor.

HSP 24.0 Disciplinary Action

Where advice and persuasion fail to achieve compliance with safety and health rules, it is the policy of Thorntons Recycling to take disciplinary action on the matter.

The following basic procedure will be followed:

- Apart from any case of gross negligence of the Safety Regulations, which may warrant instant dismissal, the employee shall be warned of any shortcomings and given a reasonable opportunity to put them right.
- Should it be necessary to take formal action a number of verbal warnings will be given. This warning will indicate the Specific Regulation, which has been breached, how it is to be rectified and the time limit in which it is to be achieved.
- A further warning will be given in writing, should the required improvement not result within the stated period.
- In any instances of alleged wilful breaches of the Safety Regulation, the case will be investigated rapidly and fully. Depending on the results of the investigation, the employee will either be dismissed, be given a written warning or return to normal work.
- All warnings for breaches of Safety Regulations will be noted in the employee's file.

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Security Shredding

Page 43 of 54
REVIEW DATE: June 2011
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- Thornton's Recycling may also implement other initiatives to enhance safety performance, from time to time. Such initiatives will be communicated to staff by their relevant manager / supervisor.

HSP 25.0 Managing Director's Annual Review

The purpose of the Managing Director's Annual Review is to present an overview of the progress made by the company over a 12-month period in the areas of safety, health and welfare.

A report will be generated at the end of the Company financial year and may include the following information:

- Number of accident and / or incidents
- Number of first aid incidents.
- Number of workdays lost as a result of incidents.
- Full details of any safety training carried out during the year

Discussion of any areas of safety, health or welfare that need to be addressed in the future as a result of new legislation, incident history or any new work practices.

Thorntons Recycling welcomes any comments/queries or suggested initiative from any member of staff.

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Maintenance, Kilmainhamwood , Head Office, Projects ,
Security Shredding

Page 44 of 54
REVIEW DATE: June 2011
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HSP 26.0 Contractors and Visitors

Visitors

Thorntons Recycling will ensure, as far as is reasonably practicable, the safety of contractors and visitors while on the premises

When entering the premises for the purpose of a business visit or to carry out work, all visitors and contractors should sign in at reception. The visitor book will record the following:

- Time of arrival
- Name of Visitor or Contractor
- Name of Employer of Visitor or Contractor

It is the responsibility of the contact employee to ensure that their visitor/contractor has signed the visitor log.

While in the building, visitors are to obey the safety rules and emergency procedures at all times. Signage will be erected to make visitors aware of safety rules. The contact employee, who in the event of a fire alarm will be responsible to bring their visitor to the appropriate assembly point, should accompany all visitors.

Contractors

Contractors will not be allowed on the company premises to carry out work until the Company has checked and is satisfied with their Health and Safety record and insurances.

The contractors must liaise with a Thorntons Recycling official to discuss and agree the safety precautions deemed necessary by either party. All contractors are required to supply specific information and documentation as requested. Failure to supply this information and to comply with the obligations contained within this booklet will constitute breach of contract and as such, the contract may be terminated.

There is a process in place for the selection and approval for contractors, this includes Third Party Contractors. These procedures are **PM16 and QP03**.

HSP 27.0 Codes of Practice

The following codes of practice have been developed by the HSA. Thornton Recycling adhere to the requirements in the codes of practice. The following is a list and links (www.hsa.ie) to the applicable documents;

Code of Practice for Working in Confined Space
Code of Practice on the Prevention of workplace Bullying
Code of Practice - Rider- Operated Lift Trucks: Operator Training
Code of Practice – Noise Regulations
Code of Practice – Working At Heights

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Security Shredding

Page 45 of 54
REVIEW DATE: June 2011
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HSP 28.0 Construction Design and Management (CDM)

Thornton Recycling are responsible for ensuring that all construction / alteration and refurbishment works to premises are assessed prior to commencement to determine whether or not they may fall within the scope of the Construction Regulations 2006. Management of construction / refurbishment works will fall under the Thornton Recycling Operations Director.

HSP 29.0 Safety Signs and Signals

The Health & Safety Manager is responsible for ensuring that all safety signs and signals comply with current Signs Regulations. Informal and formal workplace tours and inspections will achieve this. Safety signs will be adequate in size so that they can be seen from the required distance. Signs are an important means of communication. All employees, visitors and contractors shall follow signs on site.

The following give examples of signs and the applicability of the colours;

Mandatory Signs



Danger Signs



Danger Areas



Prohibition



Emergency



Chemical Hazard Signs



HSP 30.0 Traffic Routes / Safety Walkways

The Health & Safety Manager is responsible for ensuring that where there is a risk of injury arising from conflicts of traffic, adequate controls such as safety walkways and defined traffic routes will be implemented so far as is reasonably practicable. Where such control measures cannot be put into place and the risks from conflict are significant then high visibility vests / jackets will be mandatory.

The activities on site require a lot of interaction between equipment and person. Where possible Thorntons have designed traffic flows and pedestrian walkways.

There is a mandatory PPE requirement that all persons must wear.

HSP 31.0 Housekeeping

The Health & Safety Manager, Operations Managers and Supervisors are responsible for ensuring that the workplace is kept free from hazards such as trip hazards, spillages, cluttered walkways and stairs. The Health & Safety Manager has identified hazards that exist relating to House keeping issues and documented control measures to reduce and where possible eliminate the hazard. Supervisors are responsible for enforcing house keeping issues on a day to day basis. The Health & safety manager will review the effectiveness of house keeping during the internal audit process.

The following hazards should be monitored during house keeping audits;

- Clear walkways and platforms
- Clear emergency routes
- spillages
- Over spills
- Quarantine of Gas Bottles
- No Stock Piling of tyres
- Proper use of PPE

Sanitary Facilities

The Operations Director and the Health & Safety Manager or designated person are responsible for ensuring that an assessment is made of the sanitary facilities to ensure that there are an appropriate number of sanitary facilities and that they are located so that undue inconvenience is not caused to employees. They will be properly maintained and will be cleaned at least on a daily basis.

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HSP 32.0 Roofs and Work at Height

The Health & safety manager must ensure the safety of persons working at height or on roofs and those affected by persons carrying out such work. No Thornton Recycling Employees are required or permitted to work on roofs. In order to ensure adequate protection of person carrying out roof work the Health & safety Manager must ensure that the Work at Height Regulations are complied with. this will involve at the minimum a Method Statement, risk assessment and safe operating procedure. Only approved contractors will be used due to the high risk associated with such work. The Health & safety Manager will only approve working at height by approved contractors.

Identification of roof work or height work should be identified in the PM01 or PM15 procedures and the appropriate documentation followed.

HSP 33.0 Work Equipment and Vehicles

Equipment General

Thornton Recycling accepts that a well motivated and trained workforce will not succeed in providing a good quality service to our customers if poor, unsafe and inappropriate equipment is used. Therefore the company is committed to providing quality solutions utilising up to date equipment manufactured to be as safe as is reasonably practicable.

Where Thornton Recycling personnel use certain workplace equipment, all operators of equipment must be authorised. Authorisation may be by certification issued by the Health & Safety Manager, or by completion of the necessary individual skills training provided by a third party.

Safety / Suitability of Equipment

The Health & Safety Manager is responsible for ensuring that all equipment is assessed for safety and suitability. For example, all equipment must be suitably guarded to prevent injury from significant hazards such as moving parts, hot surfaces or harmful substances. New equipment (including previously used or owned) must be assessed for safety and suitability prior to supply. Once equipment is supplied, the Health & Safety Manager is responsible for ensuring that it has been supplied in accordance with stated specifications.

Maintenance

The Maintenance Manager is responsible for ensuring that a competent person adequately maintains all equipment. A maintenance schedule for all equipment identified for maintenance must be made and must state the description and identifier of the equipment, the date it was last maintained and the date it is next due for maintenance and the time period required between maintenance.

Vehicle Maintenance

The Maintenance Manager is responsible for ensuring that scheduled maintenance for vehicles, trailer, skips associated equipment such as tyres (a regular tyre condition check must be in place), tail lifts and vehicles mounted cranes is carried out in accordance with accepted standards, manufacturer requirements and the Logistics Managers instructions. The Logistics Manager is responsible for ensuring that all vehicles mounted lifting equipment has

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a maintenance schedule as required by Regulations

A fundamental part of any maintenance system is the driver pre-operational checks of the vehicle and an efficient system for reporting defects. This check must also include the ergonomic elements of the cab, e.g. the driver's seat must be in good working order. Examples of items on vehicles sometimes omitted from regular inspection / maintenance and lead to industrial injury compensation are: -

- a) Tail lift safety devices such as poles, chains of flaps / stops.
- b) Tail lift warning lights or fluorescent flaps.
- c) Steps, ladders and catwalks.
- d) Operation of load bay access doors, e.g. roller shutters or barn doors.
- e) Operation of load bay curtains on rigid vehicles or trailers.
- f) Operation of roof support devices on trailers.

HSP 34.0 Lifting Operations and Lifting Equipment

The Maintenance Manager is responsible for ensuring that all equipment falling within applicable regulations for lifting equipment and lifting operations is inspected, examined and maintained according to those regulations. All lifting equipment must have been placed on a maintenance schedule that has been drawn up by a competent person. An inventory of lifting equipment must be maintained and made available for inspection by the Health and Safety Manager.

HSP 35.0 Mobile Elevated Work Platform (MEWP)

The Health & Safety Manager is responsible for ensuring that no person operates or is a passenger on a MEWP without first having received the necessary training and have attained the required standard. Persons that have reached the required standard will be issued with a certificate of authorisation. The occupants of MEWP must be provided with fall restraint equipment. This condition extends to contractors working on site.

HSP 36.0 Manual Handling

Manual Handling General

Handling of waste is the prime business in which Thornton Recycling is involved. A large part of this involves manual handling. It is our intention to reduce the amount of manual handling operations and the associated risks as far as is reasonably practicable.

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Avoidance / Provision of Materials Handling Equipment (MHE)

The Health & Safety Manager will be responsible for ensuring that adequate assessments of manual handling operations are carried out and that appropriate control measures including the avoidance of manual handling are put into place to eliminate or reduce the risk from manual handling.

Manual Handling Training

The Health & Safety Manager will be responsible for ensuring that all employees within Thornton Recycling (this includes everyone up to and including senior management) undergo basic manual handling training upon commencement of employment. The Health & Safety Manager is authorised to provide this training.

HSP 37.0 Young Persons / Sensitive Risk Groups

Thorntons Recycling adheres to the provision of the General Application Regulation, 2007, Part 6, Ch 1.

Under these regulations 'Young Persons' means a person who has reached 16 years of age but is less than 18 years of age.

In accordance with Regulation 144, Management will prepare a risk assessment before employing a child or young person and whenever there is a change in work practice which could affect the safety or health of such a young person.

The risk assessment must examine all hazardous substances or activities which the young person may be exposed to. The company must not employ a young person where there the risk assessment reveals;

- Work which involves harmful exposure to physical, biological, chemical agents which may be toxic or carcinogenic.
- Involves harmful exposure to radiation.
- Involves the risk of accidents which it may be assumed cannot be recognised or avoided by a child or young person owing to insufficient attention to safety or lack of experience or training, or
- Which presents a risk to health from exposure to extreme heat or cold or to noise or vibration?

Where the risk assessment reveals a risk to the safety, health and welfare to the development of the young person, management must make health surveillance available, and inform the young person of the results of the health assessment.

Concluding comment

The aim of Thorntons Recycling is to provide a healthy and safe environment for members and staff, contractors and visitors. This can be achieved with the help and assistance of all by:

- Observing the general rules of safety. It is the duty of every Thorntons Recycling employee to fully comply with all safety rules and regulations. Every employee should inspect their workplace and report any unsafe condition.
- Using all equipment in a safe and proper manner. Notify any persons likely to be affected by work that you are doing.
- All injuries however slight must be reported to your supervisor.
- Wear the appropriate PPE for all tasks undertaken. Employing the proper procedures when carrying out tasks and ensuring that no practices are used which may act as a source of danger to themselves or others.
- Keeping work areas clean and tidy at all times.
- Making sure all corridors and passageways particularly those leading to escape routes, are kept free of obstructions at all times. Do not litter, use the bins provided.
- Taking care that fire points are not blocked or covered up in any way and that they are ready for use if the need arises.
- Follow all safety signs, and familiarize yourself with the Emergency Procedures.
- Vandalism of property will result in instant dismissal.
- No one is permitted to drive any company vehicle, unless they hold a licence or permit to drive the vehicle. This includes, front end loaders, cranes, fork lifts etc. Speed limits must be observed and seat belts worn at all times.
- Report any defects to your Supervisor immediately.

This Safety Statement has been prepared based on conditions existing in the fabric of the workplace of Thorntons Recycling at the time of writing. It may be altered, revised or updated periodically in order to comply with any changes in conditions.

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Page 51 of 54
REVIEW DATE: June 2011
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PART (II): Risk Assessments

Risk Assessment Process

Risk assessments have been carried out and the results are shown below. The risk assessment process involves the following:

- Identifying the significant hazards present in the workplace
- Identifying what risks are associated with each hazard.
- Recording the likelihood and severity of injury/illness associated with the hazard. Calculating the risk rating based on likelihood and severity (the risk rating is arrived at by multiplying the likelihood of injury x severity of injury - see below for details).
- Suggesting control options in order to ensure that risks are reduced to the lowest level reasonably practicable (see hierarchy of controls below).
- The length of time specified for implementing control measures will vary and be dependant on the risk rating for the hazard i.e. the higher the risk, the faster action should be taken. If additional control measures reduce the likelihood or severity of injury, a revised risk rating can be recorded.

Risk assessments should generally be reviewed annually and any necessary amendments made. They should also be reviewed if there is a change in circumstances e.g. new equipment, processes, procedures etc., following an accident or incident and in the event of new legislation, codes of practice or new guidance being published.

Hierarchy of Controls

The selection and implementation of the most appropriate method of risk or hazard control is a crucial part of the risk assessment process.

The following hierarchy should be used when deciding on control measures, starting with the first in the list and working down to the last resort which is the provision of personal protective equipment and clothing.

1. Elimination: Eliminating the hazard entirely from the workplace is the best way to control it. Examples of this would be providing a lifting device which eliminates the need to carry out manual handling or disposing of unwanted chemicals.

2. Substitution: If not possible to eliminate the hazard, replace it with something less hazardous, which will perform the same task in a satisfactory manner. Examples are substituting a hazardous chemical with a less toxic one or substituting a smaller package or container to reduce the risk of manual handling injuries.

3. Engineering Solutions: If the hazard cannot be eliminated or a safer substitute implemented, then reduce the chance of hazardous contact. Examples of engineering controls are:

- enclosure (enclose in a way that eliminates or controls the risk)
- guarding/segregation of people
- interlocks and cut-off switches
- exhaust fans

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4. Administrative Solutions:

These are the management strategies which can be introduced such as training, job rotation, limitation of exposure time, provision of written work procedures.

For example:

- Safe systems of work that reduce the risk to an acceptable level
- Written procedures that are known and understood by those affected
- Adequate supervision
- Identification of training needs and provision of appropriate training
- Information/instruction (signs, handouts)

5. Personal Protective Equipment & Clothing:

Personal Protective Equipment and Clothing should always be considered as a last resort. It can also be used as an interim measure to reduce exposure to a hazard.

Examples of PPE include: masks, ear-plugs, respirators, helmets, boots, safety shoes, overalls, etc

Summary

The most effective way to control risk is obviously to remove it. Elimination is by definition 100% effective. The further you go down the list the less effective the methods become. Training for example has been estimated as being only 10% effective.

It is also worth bearing in mind that the amount of management and supervisory effort needed to maintain the controls is in inverse rank order. In other words, Control 5 (PPE) takes the most effort to maintain and item 1 the least effort.

Risk Assessment Method Used

(Likelihood (L) x (S) Severity) = Risk Rating (RR)

Priority Table

	Severity Effect		
	Slightly Harmful	Harmful	Very Harmful
Unlikely	1	2	3
Likely	1	2	3
Very likely	2	3	4

Likelihood

Slightly Harmful	Harmful	Very Harmful
Superficial injuries Minor cuts & bruises Eye irritation from dust Nuisance & irritation Temporary discomfort	Lacerations Burns Concussion Serious sprains Minor fractures Deafness Dermatitis Asthma Minor disability	Amputation Major fractures Poisoning Fatal injuries Occupational cancer Severely life shortening disease Fatal disease Head injuries Eye injuries

Risk Rating Action Required

Risk Rating	Priority	Action Required
Trivial Risk 1-2	Non-urgent	No action needed
Acceptable Risk 3- 4	Non-urgent	No additional controls Monitoring required Assessment recorded
Moderate Risk 5-6	Action needed	Controls required as soon as practical Assessment recorded Controls documented
Substantial Risk 7-9	Urgent action needed	Controls required immediately Assessment recorded Controls documented
Intolerable Risk 10-12	Urgent action needed	Work prohibited/ceased <u>Controls required immediately</u> Assessment recorded Controls documented Work stoppage documented

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Page 54 of 54
 REVIEW DATE: June 2011
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