



Integrated Management System

Manual & Plan



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1. Aim & Purpose

1.1 INTRODUCTION

Biffa is committed to operating without causing harm to any employees, partners, members of the public or to the environment and ensuring that it provides consistently, high quality products and services to its customers. This commitment extends to working with other parties and stakeholders for the overall protection of people and the environment and also towards achieving continuous improvement within Biffa and our industry.

Our current Safety, Health, Environment and Quality Strategy incorporate key Objectives and Targets and Annual Improvement Plans to achieve this.

Biffa provides and operates a wide range of waste management services via a divisional structure; this includes collection, recycling, EfW, process, treatment and disposal of hazardous, non-hazardous and inert materials. The details of these are available via the company website and for externally registered locations will be specified within the scope of that registration.

The Company recognises that its business activities involve hazards and risks, and has therefore developed Policies and an Integrated Management System to minimise the impacts of its activities on its employees, the environment and people coming into contact (whether directly or indirectly) with them.

1.2 PURPOSE

The purpose of this Manual and Plan is to outline Biffa's approach to ensure the effectiveness of its Safety, Health, Environment & Quality (SHEQ) Management Systems.

The Document also summarises the arrangements and organisation for achieving Biffa's Health, Safety & Welfare, Environment & Sustainability, Corporate Social Responsibility and Quality Policies; in addition to outlining key ways in which the Company will achieve its commitment goals in line with the internal strategy document '*Leading & Managing Health, Safety & Environment – The Biffa Way*'.

The Company currently has accreditation to OHSAS 18001, ISO14001 & ISO 9001 and is working towards meeting the requirements of PAS 99. This document summarises how this will be achieved.

2. Scope

This document applies to all Biffa locations, sites, depots and offices.



3. Procedure & Responsibilities

3.1 SPECIFIC RESPONSIBILITIES

Delivering Health, Safety and Environmental performance is the responsibility of all Biffa employees.

The responsibility for site Health & Safety is specifically allocated to a Senior Accountable Manager (SAM) at each location, whose name is recorded on the location page of the BiffaNET. Where multi divisional operations share a location, again a SAM is identified and detailed on the BiffaNET.

Responsibility for Environmental performance again follows Divisional Management Structure with CoTC holders identified for each location operating under the benefits of an environmental permit or licence.

The Head of Safety, Health and Quality has responsibility to keep the Executive Committee informed of relevant Quality and Health & Safety/Environmental management issues.

Line Managers are responsible for monitoring work performance and the SHEQ Team is responsible for coordinating the audit of the Management System.

These personnel are in turn supported by a broad structure of staff with specialist expertise in SHEQ matters.

A full structure diagram is available via the Company Intranet BiffaNET.

3.2 TRAINING, AWARENESS AND COMPETENCE

SHEQ awareness and general responsibilities are made known to other personnel by the publicising of objectives and targets, provision of guidance notes, the undertaking of focused internal and external training courses, the giving of workplace 'toolbox talks', participation in local meetings, completion of other awareness sessions, articles in the in-house magazine, notices, etc.

Personnel in all jobs are made aware of:

- The existence of the SHEQ Policies and what they mean to them;
- The importance of meeting the requirements of the Management System as it applies to their work;
- The benefits of improved personal performance and the possible consequences of not complying with the procedures;
- Their responsibilities within the procedures including emergency plans; and
- Customer and regulatory requirements as identified by line management

Training takes into account different levels of responsibility and ability, the risks involved in the activities and the appropriate methods. All training is recorded and competencies confirmed and a periodic Performance Evaluation/Training Review is conducted to identify any training needs.

4. Definitions, Abbreviations & Additional Guidance

Abbreviation	Definition
Biffa	Includes Biffa Waste Services Ltd and all Biffa Group companies
BiffaNET	Biffa Group's intranet
BMS	Biffa Management System
CoTC	Certificate of Technical Competence
EfW	Energy from Waste
SHEQ	Safety, Health, Environment & Quality
KPI	Key Performance Indicator
IRS	Incident Reporting System
IOSH	Institute of Occupational Safety & Health
SheqNET	Biffa SHEQ Group Intranet
SIP	Safety Improvement Plan
WAMITAB	Waste Management Industry Training and Advisory Board
SAM	Senior Accountable Manager

Details of Biffa Management Systems

4.1 OVERSIGHT & SPECIFICATION

Biffa has established and maintains separate Policy documents for each of its SHEQ facets. The Policy statements are authorised by Biffa's Chief Executive Officer or appropriate Executive Director and states overall SHEQ objectives including commitment for continual improvement.

Policy documentation is reviewed annually by the Directorate to ensure they remain relevant and appropriate. Procedures and supporting company documentation e.g. Guidance, Forms etc will be reviewed on a three yearly basis from the date of issue. Significant changes to legislation, the organisation and/or its operations will trigger additional Policy or supporting documentation reviews.

Policy documents are available to all Biffa stakeholders including employees, customers, potential customers, regulating authorities and external auditors.

Internally, documents currently available on BiffaNET are widely distributed to Biffa locations and posted on notice boards as applicable.

4.2 MANAGEMENT SYSTEM PLANNING & DESIGN

Biffa recognises that a successful Management System requires planning and must align to business objectives. The policies define business strategy and direction with annual setting of objectives, targets and action plans.

There are several high level planning documents to ensure that the Company remains focused on its objectives & targets: -



The above documents are referred to routinely and reviewed regularly following analysis of existing data such as:

- Internal & external inspection and audit reports;
- Accidents/incident data and root cause investigation;
- Risk assessments;
- SHEQ KPI's;
- Business Improvement Group/Best Practice Group action plans; and;
- Changes in legislation or business operation.

(This list is not exhaustive).

Biffa produces an annual SHEQ Objectives & Targets plan – performance against this plan is reported to the Executive Committee on a monthly basis.

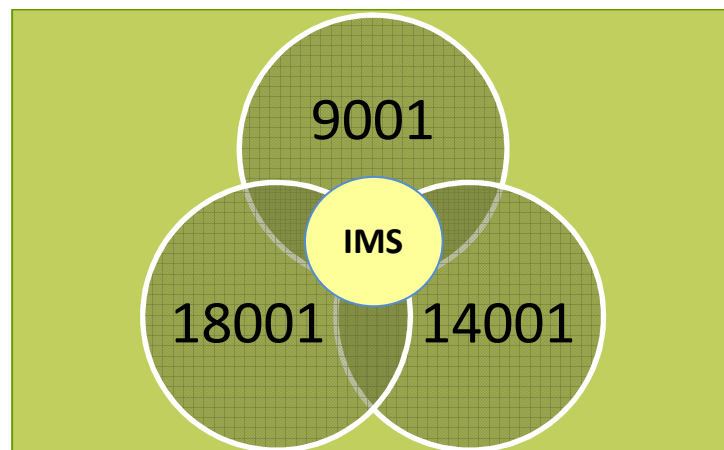
The Biffa SHEQ Objectives & Targets Plan is reviewed annually and agreed by the Board.

Each accredited location, region or division will have a specific SHEQ Plan detailing the applicable sections of the management system to meet their objectives and any or all of OHSAS18000, ISO14000 or ISO9000 as appropriate.

The Company is working towards a fully integrated management system for Safety, Health, Environment & Quality to meet the requirements of PAS 99.

This will have a number of benefits to the Organisation: -

- A single unit with unified objectives.
- A clear, holistic picture of all aspects of the organisation, how they affect each other, and their associated risks.
- Less duplication,
- Easier to adopt future systems.
- One structure that can help to effectively and efficiently deliver the organisation's objectives.



From managing our employees' needs, benchmarking our activities, and encouraging best practice to minimise risks and maximise resources, an integrated approach will help Biffa achieve our objectives.

Biffa Improvement or Best Practice Groups are held throughout the company as a forum to drive the integrated improvement plan throughout the business. Forums consist of key operational, commercial, and SHEQ management employees.

In addition to internal audits undertaken by the SHEQ Team, the Company is audited by external providers carrying out audits at different locations. This is an historical legacy as a result of merging with several companies in recent years. The long term plan is to review our position, develop a Group wide auditing strategy with one provider.

Where a design process is used in Biffa's business, the department responsible will control the design process from Planning through Development to Validation and Control.

4.3 HAZARD IDENTIFICATION, ASSESSMENT & CONTROL

Biffa has established processes for the identification of Health, Safety & Environmental hazards, assessment and implementation of control measures to mitigate or reduce inherent risk. Process outputs are analysed when setting Company SHEQ objectives.

The Company improvements for the risk assessment tool are outlined in the Safety Improvement Plan (SIP).

4.4 TRAINING, CONSULTATION, COMMUNICATION & PARTNERSHIP

4.4.1 STAFF CONSULTATION

Various mechanisms exist for employee, customer and other interested party involvement and consultation. These include:

- Safety Improvement Team meetings which are held monthly;
- Staff Surveys held annually;
- Company Internal Communication system which is cascaded monthly and gives employees an opportunity for two way feedback;
- Employee Champions appointed across the Business;
- Union Representatives on some sites consult and co-ordinate with on-site management.

Information is cascaded via the in-house publications ('In-sight' and 'In the Loop'), internal notices, BiffaNET, SHEQ Alerts, Bulletins & Circulars, For Safety News – Quarterly Newsletter the Compliance Database and relevant external bulletins as required.

Employees are:

- Invited and encouraged to become involved in the development and review of SHEQ standards and procedures via Best Practice Groups or local meetings, etc;
- consulted and informed when change will affect their workplace;
- Informed who their local, SHEQ representative or responsible manager

4.4.2 CUSTOMER REQUIREMENTS

A biennial report is produced by Biffa which provides background information on environmental performance and compliance. Information is published in hard copy and via the internet. All information is validated and authorised prior to publication. Biffa offer products and services that accommodate customer specific needs, including:

- Procedures for service delivery;
- Performance monitoring;
- Data analysis; offerings are tailored and tested with the customer prior to commencement of contracts and ensures that Biffa has the capability to meet bespoke requirements.

4.4.3 CUSTOMER COMMUNICATION & FEEDBACK

Biffa communicates with customers via publications, SHEQ Alerts, Internet, letter and both face-to-face & telephone personal contact (both formal and informal).

Dependent on the business area, Biffa will determine customer (or neighbour/public) satisfaction using one or more of the following:

- Internal/External Surveys;
- Collation of complaints;
- Customer feedback from meetings; and
- Customer surveys requested by management for specific purposes.

Biffa iSHEQ Group IMS Form Safety Improvement Team Meeting Minutes

Location Name: Bestplace Division: IS/C
 Contract No: 252 Minutes taken by: JT
 Date: 21.02.13 Date of last meeting: 21.01.13

Make your SIT meeting a FIT meeting!
 Focussed, Informative & Timely

Get involved at your SIT meetings to discuss incidents and accidents at work to stop them from happening again.
 Share your experiences with others so we can all make sure everyone goes home safely at the end of the day.

Attendees:

Name	Initials	Position / Job Title
Dean Bately	DB	Waste Officer, Strabright County Council
Fred Lucky	FL	Driver, Round 3, Southern Area
Harry Spence	HS	Driver, Round 4, Northern Area
James Thomas	JT	Supervisor
John A Tandy	JAT	Union Representative
Martin Smith	MS	Business Manager
Oliver Shorts	OS	Driver
Steve Bulcher	SB	Regional Support Manager
Samantha Lucy	SL	Regional SHEQ Coach

Apologies:

Name	Initials	Position / Job Title

Are the previous minutes agreed as an accurate record? Delete as applicable ☐ Yes ☐ No

1: Issues or actions from the previous minutes / meeting? It is very important to 'close out' actions and provide feedback promptly to our colleagues, insert rows for additional action information

Date issue raised & by who?	Issue / Action	Update / Comments / Solutions found	Date Closed or ongoing?

2: Good news – Introduction and welcome to the meeting, thank you for attending, good stories, Employees of the Month, celebrate your achievements, how many days since your last incident?

Insert text here...

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 If you have any suggestions for improvement to this document, please email: imad@biffa.co.uk Page 1 of 2

Longer term major contractual relationships will be reviewed throughout the term of the commercial relationship in accordance with local arrangements.

4.4.4 STAFF TRAINING

A review of key training requirements takes place by the HR and SHEQ teams and training matrices have been produced which identify the training needs versus job roles within the business. Each location ensures that this training matrix is kept up to date, with HR and SHEQ teams support.

Additional development training has also been identified by HR and plans have been implemented to upskill management and those displaying potential management skills within the business.

4.5 PERFORMANCE MEASUREMENT, MONITORING & ANALYSIS

4.5.1 PERFORMANCE MEASUREMENT, MONITORING & ANALYSIS

Biffa operational personnel are required and encouraged to self-report instances of weaknesses, failures and accidents. The data is entered onto the Compliance Database or IRS under pre-determined classifications.

SHEQ performance is monitored on an ongoing basis.

The sources of data include:

- Routine monitoring activities carried out by technicians or operational personnel including sampling and analysis required by consents;
- Audit results, both internal and external;
- Routine location inspection records for SHEQ or a combination thereof;
- Performance against the SHEQ targets;
- Records of accidents, ill health, incidents (including near-misses, hazards and their causes) and other operational evidence of failing Health & Safety performance recorded on IRS;
- The analysis of environmental performance from EA inspection reports.

The data is collated, validated and analysed to produce the intelligence base for consideration in the Annual Management Review.

4.5.2 ACCIDENTS, INCIDENTS ISSUES, CORRECTIVE AND PREVENTATIVE ACTION

Biffa records issues on the Incident Reporting System and Compliance Database (where access to this facility does not exist at a location, paper records are held locally and dealt with under special arrangements).

These records are ranked according to risk and tracked to completion.

An escalation system is embedded into the process which records proposed risk mitigation and risk reduction actions including the action owner responsible for delivery of the action plan. Once the action has been completed, the action owner will confirm completion and the resulting effectiveness of the control.

Incidents and accidents (including near-misses) are recorded using the IRS database and are investigated to an appropriate level with the results being recorded and retained on the IRS. Accident type and root cause analysis are available via the IRS and this data is used as an input to the Annual Management Review process for identification of action plans.

Environment Agency inspection reports are logged into the tracking database. A consolidated analysis is available by location or by report criteria and used as input to the Landfill Management Business Review (MBR) process and the Annual Management Review.

Customer service issues such as missed service KPI's will be dealt with at both local and Company level and responded to appropriately. Where contractually required, instances of missed service will be remedied in accordance with service level agreements and data produced to demonstrate recovery and improved.

Where generic or potentially regional issues are identified at a location, which may be detrimental to SHEQ performance across large areas of the company, the root cause analysis and subsequent identification of required remedial action will be allocated to a specified individual or group. The remedial solution to these problems shall be implemented across the company to prevent further occurrences.

4.5.3 CHECKING AND CORRECTIVE ACTION

Biffa analyses data produced as a result of auditing, monitoring and checking processes to improve Company performance and to measure progress towards the Company's SHEQ objectives and targets. The process is described in more detail in the sections below.

4.5.4 LEGAL AND OTHER REQUIREMENTS

New legislation and other requirements and how they affect the business are discussed as part of the SHEQ Leadership Team Meetings.

This process triggers action plans which result in implementation of improved or new control measures that mitigate or reduce Biffa's exposure to Regulatory non-compliance.

4.6 AUDIT

The SHEQ Team is responsible for the coordination of audits including the Biffa management system. The audits are programmed to support the accreditation process and provide assurance on the effectiveness of the management system in terms of performance and achievement of objectives.

The audit plan is derived to ensure that all locations are audited as a minimum once every 3 years for all key Group Policies.

The audit programme is risk based, taking into account both historical, current and future business drivers, and any actions are tracked through Biffa's tracking system.

The audit programme and reporting methods are defined. Audits are performed by independent auditors who have no direct responsibility for the area, activity or personnel being audited. Audit teams may be assisted by specialists as necessary.

4.7 SYSTEM USE

4.7.1 PRINCIPAL PROCEDURES

Group Policies have been produced to provide overarching minimum requirements for each Division to follow. Each Division is then responsible for ensuring that it develops its own specific Divisional Procedures and Work Instructions to provide further controls for each of its main SHEQ risks. Additional Guidance is also available for site locations to ensure that it meets the Company requirements in their entirety. This is diagrammatically represented in the model in Appendix A to this document.

All procedures and instructions can be found on the Company Intranet within SheqNet.

4.7.2 IMPLEMENTATION AND OPERATION

Effective delivery of the Biffa Management System involves planning, implementation, performance monitoring, feedback processes and management review. These stages are repeated to produce a 'closed loop' system to facilitate the continual improvement goal.

The mechanisms for each of these are defined in the relevant sections of this manual and are diagrammatically represented in the model in Appendix A to this document.



4.7.3 OPERATIONAL CONTROL

Operational activities are controlled through the implementation of:

Group Policies – These are the main overarching IMS documents for the Group, encompassing all the main Safety, Health, Environment & Quality high level controls. These are then supported by;

- Divisional Procedures – Each Division has developed their own business specific procedures building more detailed instructions to compliment the Group Standards.
- Guidance Notes – Are produced to assist system users to fully comply with the Policy and Procedures;
- Training Matrix and other internal & external training programmes;
- Work Instructions and Working plans;
- Risk Assessments & Safe Systems of Work;
- Permits to work; and
- Team toolbox talks.

The documents are designed to address operational Safety, Health, Environment & Quality issues.

Variances in Biffa's operational tasks, personnel and work patterns (temporary or shift workers) require different levels of control.

In Biffa, the level of control is linked to the following:

- Type of work being undertaken;
- Level of risk involved;
- Skill level required; and
- Competence of the operator.

Procedures have been derived from a number of sources including risk assessments and process maps. These procedures include:

- Correct methodology for completing tasks, stating who is responsible for doing the task and records to be kept;
- Methodology for performing maintenance activities;
- Guidelines for the procurement of goods/services including provision of specific detailed requirements for suppliers and sub-contractors to address Environment, Quality and Health & Safety requirements and improvement plans;
- Methodology required for purchase orders and subsequent checking of received goods and matching to the purchase requirements;
- Specific procedures for infrequently performed tasks;
- Necessary controls of customer property whilst in Biffa's responsibility;

- Methodology necessary for the tracing of waste as required by legislation or local needs;
- Methodology for managing equipment requiring regulatory calibration or statutory inspection; and
- Design principles appertaining to the workplace, company processes, installations, machinery and safe working methods in order to mitigate or reduce Health & Safety risks at source;

All procedures and processes are subject to review, to ensure continuing relevance to Regulation, Legislation, Company Policy and effectiveness of control.

4.7.4 EMERGENCY PREPAREDNESS & RESPONSE

Biffa has plans and procedures in place to identify the potential risk arising from incidents and emergency situations. Supporting documentation provide guidelines on the response to incidents and emergency situations that will mitigate or reduce the risk of likely illness, injury, environmental incident or other adverse effects.

The scope includes:

- Site based response plans for Waste Treatment facilities;
- Operational working plans for licensed/permitted facilities;
- A Company Crisis Management Plan is maintained for the management of major incidents/emergencies; and
- A 24hr/365 day hotline telephone number is maintained to facilitate the mobilisation of key staff in the event of emergency.

Where stipulated under Regulation or Company protocol, the emergency plans and procedures are tested. The tests are usually through simulated exercises, e.g. evacuation, fire test etc. The object is to monitor personnel performance, their understanding of the plan and how effective it is. Post exercise analysis is carried out to evaluate learning points.

Threat of or actual regulatory action against Biffa is escalated to senior management for further investigation to establish root cause and verify the effectiveness of existing control measures and measures taken to mitigate the risk or reduce potential recurrence.

Emergency arrangements are reviewed periodically (especially following an exercise or real incident or emergency) to confirm their suitability and effectiveness.

5. References

5.1 As detailed in section 4.2

6. Document Control & Review

6.1 REVIEW & CONTINUAL IMPROVEMENT

6.1.1 MANAGEMENT REVIEW

Biffa's management system details the current levels of management review of the system on a periodic basis. The reviews are designed to confirm the continuing suitability, adequacy and effectiveness of the system.

A management risk review takes place at least annually and will consider:

- Continuing relevance of each of the existing SHEQ policies
(N.B. any policy changes are approved at Executive Committee level;

- Implementation of remedial action plans;
- Mitigation of high risks;
- Key Performance Indicators for Biffa and its suppliers;
- Audit findings;
- Compliance with Regulation;
- Changing legislation and its business impact;
- Improvement plans required for BMS;
- Set objectives, targets, and action plans to align with company strategy.

Divisional, Regional or local reviews are held to review the system. Other reviews are incorporated into the Best Practice Group meetings and focus on the performance of particular groups, areas or divisions.

The resources required to operate and improve the Management System are reviewed annually by Executive Committee members (in conjunction with their line managers) when the Company's budgets are finalised for the forthcoming year.

6.2 DOCUMENTATION & DATA CONTROL

The Biffa management system is available to all Biffa personnel. The controlling documents are subject to regular review as scheduled in the index. The latest controlled version of all documents is on the Intranet systems.

The management system also collects data from various sources, in both paper and electronic forms. The integrity of this data is maintained to ensure its validity when used as input to the review process.

The main methods for documentation controls on the system are: -

- Group Policies, Divisional Procedures and Guidance Notes;
- Compliance database – which details location specific information including asbestos surveys, site plans, accident information and action tracker to monitor ongoing issues;
- Biffa Observation - a behavioural tool which is due to be introduced during 2013 as an all encompassing near miss, hazard identification and inspection tool;
- Biffa Incident Reporting System (IRS) – A modernised and improved system was introduced in 2012, continual further review will be implemented to improve its functionality further
- Team Rooms and File Share enable documents to be shared and communicated internally by the SHEQ and Operational teams.

6.3 RECORDS AND RECORDS MANAGEMENT

The majority of management system records are generated electronically within Biffa's systems. These records are held securely under restricted access control. The data is backed up to prevent loss of data through accidental deletion or system failure. Where electronic facilities do not exist at a location, paper records are held at site level.

Records are identified as being relevant to a particular site or location. They are traceable to the particular load, day, job, area or location involved and can be easily retrieved by authorised personnel for analysis. They are protected against damage, deterioration or loss.

Retention time for documentation is defined and complies with Company Policy and statutory legislation.

6.4 BIFFA'S INTEGRATED MANAGEMENT SYSTEM

The Management System is known as the BIFFA Integrated Management System.

The diagram below shows the organisation of this system and how the external and internal influences are translated via a compliance database which details the specific requirements for individual locations and a documented system with training support to meet the business needs.

In turn, the database requirements are used by operational staff and audit teams as the criteria for checking and audit.

