

Occupational Health & Safety Policy

**Asbestos Abatement Services Ltd
Unit 1, North Street
Walsall
West Midlands
WS2 8AU**

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Asbestos Abatement Services Ltd Occupational Health & Safety Policy

A: POLICY INTRODUCTION

The Company has two locations:

Head Office & West Midlands Office

Unit 1, North Street, Walsall, West Midlands WS2 8AU

East Midlands Office

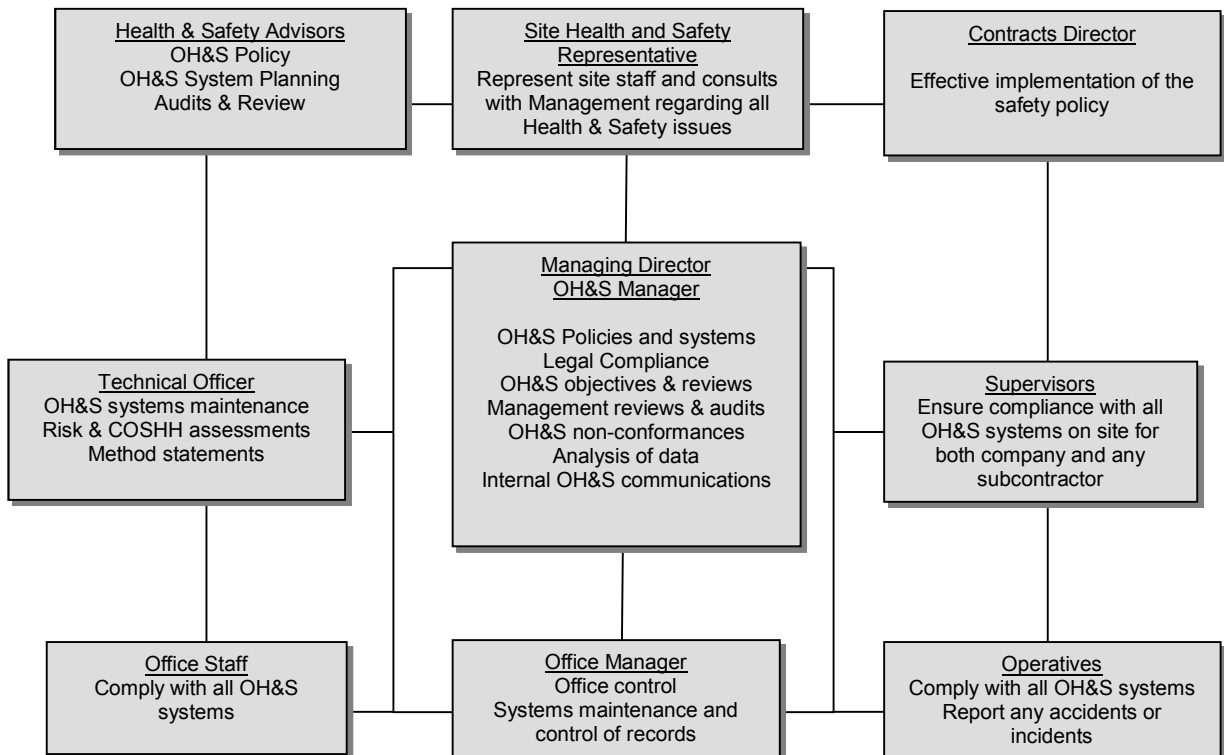
Unit 5, Sapcote Road Industrial Estate, Burbage, Hinckley, Leicestershire LE10 2AU

The Company provides a service to survey properties for the presence of asbestos and to remove or encapsulate asbestos containing materials.

The policy provides details of the system that has been adopted by the Company to control Health and Safety as far as reasonably practicable and provides the overview of the management systems relevant to the Company along with the responsibilities incumbent upon members of staff for ensuring continuing system compliance.

To allow the Company to maintain a recognised Occupational Health and Safety System, it has adopted the OHSAS 18001 Occupational Health and Safety Management System as its minimum internal standard.

This is the Health & Safety communication structure for the Company



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B: HEALTH AND SAFETY POLICY STATEMENT

Asbestos Abatement Services Ltd recognises that it has a responsibility and is committed as an employer to ensure the "Health, Safety and Welfare" of all employees whilst at work. Additionally it is the responsibility of all persons who work for Asbestos Abatement Services Ltd (Directors, Managers, and Employees etc) to ensure this policy extends to all other persons who may be affected by our current work activities. In this way, each and every individual within the organisation has a vital and specific role in maintaining our health and safety standards.

Responsibility for the overall implementation, maintenance and development of our safety management system, however, rests with the senior management of Asbestos Abatement Services Ltd, including the regular setting and reviewing of objectives, and the provision of adequate resources to allow those objectives to be achieved.

It is also the responsibility of the senior management of Asbestos Abatement Services Ltd, to ensure that the health and safety policy is relevant and conforms to all applicable legislation, and to demonstrate leadership in Health & Safety by recognising the importance of its staff and encourage the reporting of any hazard or risk that may adversely affect health and safety performance.

Senior Management recognizes the importance of ensuring that all employees are adequately trained, informed and supervised to carry out their activities in a safe manner, and that sub-contractors are only employed should they meet the same criteria.

Asbestos Abatement Services Ltd is committed to a management system that demonstrates a proactive approach through to the continual improvement of our Health & Safety System. This is further achieved by the regular consultation with all staff to regarding Health & Safety issues and to set and review objectives to achieve compliance with current safety legislation and our industry's best practices.

Asbestos Abatement Services Ltd also recognises the need for the identification of hazards and the recording and reviewing of risk assessments.

The effectiveness of our Health and Safety policy and its implementation are subject to regular management reviews and all related processes and procedures are subject to an on-going audit schedule.

The policy and the way in which it has operated will be brought to the attention of all employees and persons working on behalf of the Company. It is freely available on the Company's website and will be reviewed as a minimum on an annual basis.

Signed



Gerard Maguire – Managing Director
Date: January 2013

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C: PLANNING

C1: Planning for Hazard Identification, Risk Assessment and Risk Control

Ensure that sufficient resources are made available for the safety system to be fully affective.

It is the aim of the Company is to first identify the extent of the risks that are posed by routine and non-routine activities undertaken as part of our own work processes. The basis for identifying these risks within the Company is the process of hazard identification, risk assessment and risk control.

Reviews of the risk assessment / risk control arrangements will completed on an annual basis unless there is a change in the activities or work equipment, which demand that an interim or new assessment is to be completed.

The results of all risk assessments will be entered onto the relevant risk assessment forms and any remedial actions highlighted as part of the assessment, this forms part of the Company's on-going commitment to the setting and reviewing of occupational health and safety objectives.

All Objectives identify the task to be completed, the person responsible for ensuring the task is completed and a deadline date for its completion

C2: Legal and Other Requirements

Many of the procedures and operations used within the Company that are included in our risk assessment process have relevant guidance published by external agencies (HSE / ARCA / BSI / Environment Agency etc) that will assist the Company in complying with health and safety legislation

We have a library of relevant legislation and associated guidance notes that are applicable to the activities currently conducted within the Company which is kept as part of the ISO9001 quality management system. The library is kept in the general office and is available to anybody at any time.

We recognise the special requirements regarding the employment of pregnant women and persons under the age of 18. Specific risk assessments will be prepared should the company employ a young person or we are advised by a female employee that she is expecting.

C3: Objectives

The Company's health and safety management system allows for two levels of Objectives:-

System objectives Resulting from staff consultation and management review of the health and safety system.

Re-active objectives Resulting from Risk Assessments, Accident Investigations, Audits and matters arising out of Health & Safety Committee meetings etc.

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C4: Occupational Health and Safety Management Programme

To ensure that nominated tasks are completed against designated targets it is the responsibility of the designated appointed person to carry out a review of the actions plans on a regular basis. Any additional reviews are delegated to the Company's health and safety consultancy Company MJL Consultancy Limited.

Where tasks have been identified as behind the designated targets, a joint decision between the senior management and its health and safety consultants will be made concerning the best corrective action to be taken.

D: IMPLEMENTATION AND OPERATION

D1: Structure and Responsibilities

Notwithstanding the fact that all members of staff within the Company have a responsibility for their own safety and the safety of others, specific responsibilities have been assigned to designated personnel within the Company.

A communication chart is provided within Section A of this policy which outlines the structure for the maintenance and development of its safety management system. Although specific responsibilities and authorities may be contained within various procedures in our health and safety manual, the main system responsibilities have been assigned as follows:-

D1.2: Managing Director & OH&S Manager – Gerard Maguire

- To be ultimately responsible for health and safety and information security in the business and appoint Health & Safety Advisors.
- Promote and co-ordinate health and safety within the company.
- Ensure the sufficiency of financial and other resources to meet safety requirements.
- Support all employees in achieving the highest standards in accident prevention, avoiding risks to health, and minimising the waste of resources by providing suitable training and instruction
- Control and updating of the Health and Safety documentation.
- Production of method statements, risk assessments, risk control arrangements and subsequent reviews
- Monitor Health & Safety performance and ensure that accidents and dangerous occurrences are properly investigated and action taken to prevent recurrence
- Review of sub contractor questionnaires to check sub-contractors ability to carry out their work and comply with their Health & Safety obligations, should review be successful approve them for entry onto the companies approved list
- Ensure office based fire log and regular checks of fire alarms, extinguishers and emergency lighting are carried out
- Ensure any RIDDOR reportable accidents are properly recorded and reported and instigate accident investigations

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D1.3: Contracts Director – Ian Beardsmore

- Promote health and safety within the company.
- Ensure the effective implementation of the safety policy, security policy and associated procedures.
- Ensure the sufficiency of financial and other resources to meet safety requirements.
- Encourage all employees to achieve the highest standards in accident prevention and risk reduction
- Establish and maintain safe systems of work and carry out internal site safety audits
- Ensure that accidents and dangerous occurrences are properly reported and action taken to prevent recurrence
- Monitor the performance of sub-contractors to ensure they comply with their legal duties and the Company's requirements
- Ensure all employees especially new recruits receive adequate safety training as detailed in Section D2

D1.4: Technical Officer

- Ensure the effective implementation of the safety policy and associated safe working procedures and risk control arrangements
- Ensure all plant and equipment is suitable and regularly maintained and records kept
- Production of site specific risk assessments and method statements

D1.5: Office Manager

- Carry out fire alarm tests, inspections and trial evacuations for the office and warehouse
- Maintain Personnel training, face fit, exposure and medical records

D1.6 Supervisors

- Ensure the effective implementation of all company procedures and compliance to method statements
- Apply the same strict standards of health, safety and welfare to sub-contractors and others working under the control of the company.
- Ensure that accidents and dangerous occurrences are properly reported and immediate corrective action taken to prevent any recurrence.
- By example, encourage good safety practices.
- Ensure that suitable first aid facilities and adequate safety equipment are available and used when required.
- Ensure that the operations under their control are, so far as is reasonably practical, conducted without detriment to the health and safety of employees or others who may be affected by their activities.
- Supervision of sub-contractors to ensure they comply with their Health & Safety obligations
- Carry out any other duties as defined by this Health and Safety Policy or contract specific method statement, works instructions or risk assessments.
- Ensure all polices issued by the company are observed on site

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D1.7 Individual Employees

- Abide by the all polices issued by the company. Any employee who deliberately contravenes the Health and Safety Policy may be subject to instant dismissal.
- Making themselves familiar with, and conforming with, Asbestos Abatement Services Health and Safety Policy at all times.
- Conforming to the Safety Rules and Safe Systems of Work Procedures at all times, including permit to work systems, inspection and testing etc.
- Wearing appropriate safety or protective equipment, personal footwear or clothing and using appropriate safety devices, as specified, at all times.
- Making suggestions to improve health and safety in the company to the management.
- Reporting without delay all risks or hazards, including defects to machinery, unsafe practices, and “near miss” situations directly to his/her Manager.
- Reporting without delay any injury suffered as the result of any accident during the course of their work to their immediate supervisor or First Aider as appropriate.
- Ensuring that good housekeeping is maintained at all times at their work station and surrounding area
- Taking reasonable care of themselves and other persons who may be affected by their actions whilst at work.

D1.8 Health and Safety Consultants – Bibby Consulting & Support

- To provide advice to management on the requirements and implementation of necessary health and safety procedures to comply with legislation, regulations, and company requirements.
- To advise on the preparation of risk assessments and health and safety plans.
- To undertake audits of company health and safety activities and report the findings to the Managing Director.
- To assist in developing and establishing safe systems of work and maintaining and updating the Health and Safety Policy and associated documentation.
- To assist in the investigation of accidents or dangerous occurrences, and advise on appropriate measures to prevent future occurrences.
- Ensures that the annual risk assessment process is completed in a timely fashion and any issues arising are entered onto the Re-active Objectives Action Plan.
- To be available to all employees who have any questions relating to Health & Safety matters.

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D2: Training, Awareness and Competence

The Company recognises training as a key feature in its on-going program to ensure an effective health and safety management system. Training needs are identified on an ongoing basis taking into account

- Statutory Regulations
- Industry Best Practice
- Discussions held at Health & Safety committee meetings
- Requests from employees
- Feedback from clients and training providers

It is the responsibility of the Contracts Director – Ian Beardsmore to ensure that the required training is completed in a timely manner.

Training provisions within the Company are divided into these main areas: -

Induction Training	This is an internal program covering the general health and safety issues and activities of specific importance to new employees. In addition to this any new employee who maybe exposed to asbestos fibre will undergo an Asbestos Induction Course provided by a body on the HSE list of recognised training providers UKATA
Job / Task Specific	This is an internal or external program where specialist skills or knowledge is required to conduct a specific task or activity.
Tool Box Talks	Given at site level to emphasis Health & Safety issues associated with a particular task
Health & Safety Meetings	This is a formal meeting which all staff attend to discuss Health & Safety issues only including any training needs
Refresher	This is an internal or external program where additional training will be provided at specified intervals for up-dating personnel trained in specific tasks.
Sub Contractors	Any sub-contractors shall demonstrate to the satisfaction of the Company that they have had adequate training/instruction to carry out the task for which they have been employed or appointed. Before any new sub contractors are appointed they must complete the companies sub contractor questionnaire which is reviewed by the Managing Director and if acceptable they will be entered onto the approved list.

External training providers for asbestos activities shall only be used if they are members of UKATA. Other training undertaken will be contracted to recognised training bodies which can issue industry recognised certifications.

Should an employee fail a training course assessment or be considered not to be competent by the company to carry out the duties he is employed to do, the company reserves the right to change their role until such time by additional training and supervision they can prove competence.

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The Contracts Director shall ensure that each employee is competent to carry out their assigned tasks.

All staff are encouraged to complete a recognised competency scheme to achieve an NVQ level certification equal to the requirements of their position and responsibility

D3: Consultation and Communication

Due to the size of the company and the nature of the business, consultation and communication of health and safety issues is generally undertaken on an ongoing informal basis between the management and the staff. The management recognises the importance of its staff in ensuring that it maintains an adequate safety management system.

The setting / reviewing of safety objectives is publicised to all members of staff to make sure that all employees within Asbestos Abatement Services are involved in the development of the safety management system.

All staff attend Health & Safety meetings which are held as a minimum once per year to discuss, review and set objectives for Health & Safety issues and to ensure all staff are kept involved in the development of the safety management system. The minutes of these meetings are available to anybody on request and are posted on the notice board in the kitchen.

Where more formal means of communication are required e.g. accident / incident reports, formal reporting procedures exist and employees are encouraged to report any item they feel may present a potential hazard. A safety representative of the employees nominated by them provides a means of easy communication regarding any Health & Safety concerns

Employees will always familiarise themselves with client procedures when first attending site, in particular general site access, emergency procedures and high risk work activities including permit to work systems. Clients site procedures and specific instructions will be followed at all times.

Before commencing work, the site supervisor will attend any site meetings or inform other trades working in the direct vicinity of the activities of the company of the specific risks and requirements of the work being undertaken.

All changes in the safety management system will be explained at Health and Safety Committee meetings or in the form of Tool Box Talks on site

D4: Documentation / Document and Data Control / Record and Record Management

The Managing Director – Gerard Maguire is responsible for all documentation held within the Asbestos Abatement Services - Company Operations Manual and keeps an updated collection of Statutory Regulations and Codes of Practice relevant to the business, He is responsible for retaining these documents and for ensuring that necessary copies where required are issued to employees or any other interested parties.

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Procedures exist for the issue, review and revision of all documents and forms relevant to the health and safety management system. Additional reviews of these documents along with any other related guidance / legislation / standards may also be delegated to Asbestos Abatement services health and safety advisors – Bibby Consulting & Support

All statutory records regarding Health & Safety are to be kept including the requirements to maintain employee asbestos exposure records for 40 years

Personal monitoring is to be carried out when new work methods or ACM's are encountered or as a random check on levels to ensure the exposure assessments are not being exceeded. Records of this monitoring are to be kept so that any trends or discrepancies in the results can be investigated.

Target frequency of Personal & Ambient Air Monitoring while carrying out asbestos related work on the following types of material. The procedures for retaining these records is part of the Company Quality System which complies to ISO 9001

<u>Type of Asbestos Material</u>	<u>Target</u>
Sprayed flock	Every contract
Thermal Insulation (removal)	50% of contracts
Thermal Insulation (wrap and cut)	10% of contracts
Asbestos Insulation Board	5% of contracts
Asbestos Cement, textured Coatings and other ACM's	1% of contracts

D5: Operational Control

Procedures and safety working practices are retained in the Company Operations Manual and have been produced to outline the operational and management controls of relevant activities within the Company, these may include: -

- Routine and Non – Routine activities or operations, that may carry a significant risk.
- Activities / Operations that may require the assistance of external contractors
- Building monitoring and maintenance
- Equipment monitoring and maintenance.

In the majority of instances the production of any procedures or safe working procedures will normally follow the completion of a suitable and sufficient risk assessment.

On occasions, it may be necessary to acquire risk assessments and method statements from a third party. This documentation will be reviewed by the Company's health and safety consultants – Bibby Consultants

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D6: Hazardous Substances (COSHH)

Before any hazardous substances are used during a work process, a material safety data sheet (MSDS) will be requested from the supplier and an appropriate assessment made of the risks from that substance will be undertaken by Gerard Maguire in line with the Control of Substances Hazardous to Health Regulations 2002 (COSHH). Alternative less harmful substances will be used wherever possible.

Assessments will consider storage, handling, and aspects of use, exposure, PPE requirements, workers health, and emergency actions. Supervisors will brief staff on any hazard or substance precautions, with written records being located in accessible locations and issued to all staff.

An inventory of all substances and materials hazardous to health used by the company is held by Gerard Maguire.

D7: Production of Risk Assessments

The Company produces risk assessments in order to identify hazards and to evaluate the risks to its employees, other workers, members of the public and anybody else that could be affected by our work. The Company follows the approach in the "Five steps to risk assessment" published by the HSE. Anybody involved in the production of risk assessments will receive suitable and adequate training

Step 1 Identify the Hazard

- A hazard is taken to mean any substance, article, material or practice which has the potential to cause harm
- Hazards are identified by
 - examination of the workplace
 - examination of Pre construction Health & Safety Plans (if available)
 - discussion with client or main contractors representatives
 - examination of suppliers instructions
 - consultation and ongoing discussions with all employees
 - examination of accident statistics and ill health records
 - historical knowledge

Step 2 Decide who might be harmed and how

- For each hazard there are groups of people who may be harmed such as
 - the person carrying out the work
 - other workers or occupiers on the site
 - visitors
 - public
 - trespassers
- Decide who will be affected and note how they could be harmed
- Some people may have particular requirements that have to be taken into account when producing the risk assessment such as
 - young persons ,expectant mothers, new parents, disabled persons, vulnerable persons
- Discuss with employees who they think may be at risk

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Step 3 Evaluate the risks and decide on precautions

- Risk is taken to mean the potential to cause harm in the actual circumstances of use and the likelihood of that potential being realized.
- The Company is required to do everything reasonably practicable to protect people from harm and strives to achieve best practice in the industry to meet this requirement
- Consider if the hazard can be eliminated, if not how can the risks be controlled so that the possibility of harm/injury is reduced such as
 - reduce the risk
 - prevent access and exposure to the hazard
 - issue the correct PPE and RPE to help reduce the risk

Step 4 Record and implement the findings

- The Company records risk assessments in writing and distributes them to all its employees
- Risk assessments can be in various formats dependent on its complexity
- The standard site based risk assessment sheet is based on a scoring system which is explained on the sheet itself. This identifies the hazard, who is at risk and the risk itself. The existing risk assessment control arrangements are detailed on individual sheets which are always kept in the site documentation. Should additional controls be required then they are to be recorded on the sheet which is issued as part of the method statement.
- All jobs require that an on site risk assessment is carried out by the person in charge of the work before it commences on site to identify any additional risks or additional controls required. This must be recorded either on the risk assessment sheet or in the site daily diary
- All risk assessments form part of the method statement and must be explained to all employees before work commences in the form of a site induction or tool box talk

Step 5 Review risk assessment and update if necessary

- All risk assessments should be reviewed as a minimum annually this would usually occur in March however reviews may be required at any time as new hazards or risks are identified
- Any new or revised risk assessments are discussed with all employees at the Health & Safety Meetings so their input can be made
- Any changes in standard risk assessments are to be distributed to all employees as soon as they are available

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D8: Work Equipment

All work equipment (including electrical equipment) used at work will comply with the Provision and Use of Work Equipment Regulations (P.U.W.E.R.).

Before new equipment is introduced into the working environment, an assessment will be made by management in order to ascertain that the equipment is suitable for its intended use.

No employee will use work equipment for which they have not received specific training.

No employee will knowingly misuse work equipment or remove any guards that are in place to minimise a specified risk.

All work equipment will be maintained and inspected at suitable intervals either internally by a competent person or by specialist external companies. The frequency of work equipment maintenance or inspection will be based on manufacturer's guidance and industry best practice.

Any maintenance / inspections undertaken on company equipment will be formally recorded

If any faults or damage are found on any equipment, stop using the work equipment and report the fault to management.

D9: First Aid and Accident Reporting

Adequate first aid provision will be made at every place of work occupied by the Company. Each first aid box shall be suitably marked and be easily accessible to all employees at all times when they are at work.

On Project Sites

Wherever possible arrangements are made with client/principle contractor to use their first aid facilities. Where this is not possible, a member of the project team will be nominated as the appointed person for first aid and a first aid box supplied, which will contain adequate supplies for the total number of employees on site.

Head Office

The first aid box is located in the Kitchen

Qualified First Aider - James Beardsmore

All accidents **MUST** be reported to your Site Supervisor / manager and the details recorded in the accident book (held by the Supervisor or available in office). Serious accidents where hospital treatment is required must be reported to Gerard Maguire as soon as possible after the incident.

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Accidents, Incidents and Non-conformances within Asbestos Abatement services are divided into three main categories: -

Major Accidents / Incidents

(These are always investigated and where appropriate reported to the enforcing Authorities)

Minor Accidents / Incidents

(These are only investigated when sufficiently serious to warrant investigation)

Substantial variations to working practices resulting in dangerous occurrences arising

(These are always investigated)

All investigations will be conducted by the designated appointed person with any further assistance provided by Asbestos Abatement services health and safety advisors – MJL Consultancy. Any remedial actions resulting from the investigation will be recorded for implementation by the designated appointed person and reviewed by the Management Director

Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (R.I.D.D.O.R.):

Certain accidents are reportable to the HSE's Incident Contact Centre. Gerard Maguire must be notified as soon as practicable after incidents causing the following injuries:

- Any work related injury that leads to an employee being absent from work for more than 3 working days
- Fracture other than to fingers, thumbs or toes;
- Amputation;
- Dislocation of the shoulder, hip, knee or spine;
- Loss of sight (temporary or permanent);
- Chemical or hot metal burn to the eye or any penetrating injury to the eye;
- Injury resulting from an electric shock or electrical burn leading to
- Unconsciousness or requiring resuscitation or admittance to hospital for more than 24 hours;
- Any other injury: leading to hypothermia, heat-induced illness or unconsciousness; or requiring resuscitation; or requiring admittance to hospital for more than 24 hours

All accidents / incidents will be investigated by senior management and/or the Health and Safety Co-ordinator / Representative with the following objectives

- To determine the cause(s) with a view to preventing a recurrence
- To gather information for use in any criminal or civil proceedings
- To confirm or refute a claim for industrial injury benefit
- To prepare notification to be made to the Health and Safety Executive

The degree of investigation will be dependent on the seriousness of the accident. The aim of the investigation will be to seek to answer the following questions;

- WHAT caused the accident?
- WHO was involved?
- WHEN did it occur?
- WHY did it occur?
- HOW could it have been prevented?
- HOW can a recurrence be prevented?

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D10: Manual Handling

Manual handling operations will be risk assessed to determine suitable control measures for the management of risk and the company will endeavour to eliminate manual handling operations where practicable with any remaining risks being controlled by;

- Reducing weights
- Reducing the frequency of manual handling
- The use of additional manpower
- Through the provision of suitable equipment to assist in the operation
- The selection of persons to carry out manual handling or lifting tasks will be based on the training given, age, physique etc.

D11: Emergency Preparedness and Response

The nature of the work activities undertaken within Asbestos Abatement Services are such that protracted emergency plans are not necessary and the provisions of C.O.M.A.H. (Control of Major Accident Hazard regulations) do not apply.

However, where appropriate, procedures and safe working practices have been developed to address the potential emergency situations that could arise within Asbestos Abatement Services.

It is the Company's policy to take account of fire hazards in the workplace.

All employees have a duty to conduct their operations in such a way as to minimize the risk of fire.

This involves compliance with the Company's no smoking policy, keeping combustible materials separate from sources of ignition and avoiding unnecessary accumulation of combustible materials.

Site Supervisors are responsible for keeping their operating areas safe from fire, ensuring that site staff is trained in proper fire prevention practices and emergency procedures.

D12: Staff Welfare

Wherever possible arrangements will be made with the Client and/or Principal Contractor for the use of Welfare facilities at sites under their management. As a minimum the following requirements will be adhered to:

- Toilet/washing facilities accessible on site
- Eating/rest facilities accessible on site
- First aid provision

Where these facilities are not provided by the Client or Principal contractor, Asbestos Abatement Services will provide suitable welfare facilities.

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D13: Personal Protective Equipment

Appropriate personal protective equipment will be issued to employees as and when necessary for work activities.

Training will be provided for employees on the safe use, storage and maintenance of the relevant equipment before issue and a written record detailing what PPE has been issued will be signed by the employees on receipt of the equipment and the hard copy kept on file.

Employees have a legal duty to wear PPE as specified in relevant site rules, risk assessments and method statements.

Any defects or malfunction of PPE must be reported to Ian Beardsmore

D14: Sub Contractors

Before considering employment of sub-contractors they must fill out an Asbestos Abatement Services assessment questionnaire, which must be signed by a senior representative of the sub contract company and they should date and state their position. Other checks that will be carried out for review will be:

- Known history and previous work carried out
- References from previous clients
- Accident history and any improvement or prohibition notices from enforcing authorities
- Copies of insurances
- Experience and training

The Managing Director will review the documents and other checks made before confirming acceptance of the sub contractor as qualified and competent to be an approved contractor

All site sub-contractors once appointed will be managed by the Contracts Director

Site induction and tool box talks will be given by the site supervisor and any information regarding health and safety or job specific requirements etc will be given in these briefings.

The same arrangements for accidents reporting, first aid, welfare, near miss reporting etc as shown in the policy will apply to all sub-contractors.

Any non English speaking sub-contractors will be identified during the assessment of the sub-contractor stage. Any provisions to aid communications e.g. provide information in various languages and formats: videos, clear diagrams, pictograms will be produced as required by the sub-contractor or Asbestos Abatement Services as appropriate.

Any sub-sub contractors will be processed in the same way as the sub-contractors by the use of questionnaires and other set criteria. All of which will be managed by the Managing Director.

Sub contractors performance shall be reviewed by the Managing Director after consultation with staff on an ongoing basis and more formally at Health & Safety meetings, as a minimum sub contractor reviews are to be undertaken annually

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E: CHECKING AND CORRECTIVE ACTION

E1: Performance Measurement and Monitoring

The health and safety management system within the Company allows for both pro-active and re-active monitoring.

Pro-active monitoring within the Company can be achieved by the following means:

- Risk Assessments
 - These are to be produced for each contract, to ensure our that the safety of employees and anybody effected by our operations is fully considered
 - Existing risk control arrangements are detailed in documentation which is available on all sites and these arrangements are reviewed by all staff at the companies Health & Safety Meetings
 - Individual contract risk assessments are to refer to the existing arrangements and add in any additional hazards or controls that have been identified
- Workplace Inspections and audits
- Periodic Statutory Inspections
- Compliance with action plans and objectives set at internal Health & Safety meetings

Re-active monitoring is undertaken following serious accidents or incidents, reports of ill-health, property damage or receipt of customer complaints.

It is the responsibility of the Managing Director to review both aspects of monitoring on a periodical basis as reasonably practicable this may also be achieved through the assistance of the Company's health and safety advisors – MJL Consultancy

Measurement of performance therefore focuses on an on-going evaluation of achieving the safety objectives within the time-scales agreed and from review of the relevant inspection documentation and informal discussions with all employees.

E2: Non-conformances and Corrective and Preventive Action

Procedures exist within the Company's health and safety policy to ensure that any variations from its policies and any uncontrolled activities are investigated and where appropriate remedial actions are planned and implemented.

The need for corrective action is identified from client information, Accident / Incident Reports, internal/external audits and reviews undertaken at the Health& Safety Committee meetings

The need for preventative action is normally identified through the Risk Assessment Process

In both instances, on-going monitoring within the Company assesses the suitability of the corrective and preventative actions taken and the successful implementation of these actions.

In both instances the activities are reviewed at the Health& Safety Committee meetings which are attended by all staff at least one per year

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E3: Auditing

It is the responsibility of the Managing Director to ensure that a suitable and adequate on going audit programme is in place to cover every aspect of this policy at least once per year and in accordance with the following matrix

- Company Health & Safety Consultants At least one audit per year
- Trade Association (ARCA) At least two site audits
- External audits At least one audit per year
- ISO external audits One per ISO standard per year
- In addition to the above the Company employs an external auditor to monitor the office procedures under the standards in holds under ISO9001, ISO14001 and OHSAS18001
- The Company is also subject to safety audits carried out by its insurers, clients and others in the course of its contract operations.
- The Contracts Director is responsible for carrying out site safety audits on an ongoing basis every time a site is visited and should record these inspections formally at least 12 times per year.
- The results of all safety audits are reviewed at the Health & Safety Committee meetings which are attended by all staff at least one per year

F: MANAGEMENT REVIEW

F1: Purpose of the Review

It is the responsibility of the Managing Director to ensure that Health and Safety Review Meetings are held and that all staff are present along with any other person co-opted to assist in the maintenance and development of the Company's health and safety management system. The review meeting which is held as a minimum once per year will determine the successful implementation of the health and safety management system and is considered to be the main forum for the discussion of any system objectives.

F2: Agenda for the Review Meeting

The Agenda for the meeting will typically include the following items:-

- Agree previous minutes.
- Review Non Conformances / Corrective Actions and Audit results
- Review of COSHH and Risk Assessments
- Changes in Health and Safety Legislation and its impact on the Company
- Review and set objectives
- Review Contracts completed
- Review the Health and Safety Policy, Safe Working Procedures and Risk Control Arrangements
- Accident reporting, statistics and review
- Assess any training needs

It is the responsibility of the Managing Director to issue and distribute minutes of the meeting, which includes copies of any new objectives that have been set. Copies of the minutes are posted on the notice board in the kitchen and are available to all staff on request; a further copy is retained for Health and Safety records.