

Asbestos Management Solutions



Environmental Essentials

Health, Safety and Environmental Policy

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1. Introduction

The primary function of this document is to facilitate the implementation of Environmental Essentials Health, Safety & Environmental Management Policy (HSE Policy).

The policy defines and establishes how Environmental Essentials (EEL) will achieve the requirements of the Health and Safety at Work etc Act 1974, environmental requirements and all associated applicable legislation.

This policy sets out EELs commitment to protect the environment and the health, safety and welfare of employees at work and others who may be affected by any undertakings. The policy underpins our management systems: OHSAS18001 – ISO14001 and ISO9001. As such this document shall:

- (1) State the company general policy on health safety and environmental management
- (2) Describe the organisation and arrangements for implementing the policy
- (3) Be brought to the attention of all employees and clients as required
- (4) Be monitored, reviewed and revised as often as necessary, but not to exceed 12 months

This policy also supports the EEL Quality Procedures.

The HSE policy has been:

Prepared by: Kathryn Ing – health, safety and environmental manager (HSE manager)

Reviewed by: Board of Directors

Reviewed on: 21/01/2018

Issued on: 24/01/2017

Issued as: Version 05

Due for review: 21/01/2019

Due for re-issue: 24/01/2019

1.

Health Safety and Environmental Policy Statement of Intent

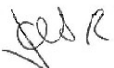
At Environmental Essentials Limited we recognise that we are responsible for and are committed to ensuring the health, safety and welfare of all employees whilst at work and also clients and others affected by our undertakings. We regard health and safety at work and environmental management as important and are committed to a process of continual improvement through effective leadership. We seek to achieve the highest standards in health and safety & environmental management not only because compliance with legislation is mandatory but also because it is in the best interests of the company to do so.

It is our stated policy intention to:

- Provide adequate control of the health safety and environmental risks arising from asbestos related activities , including, UKAS accredited asbestos surveying, air monitoring, sampling and analysis of materials for asbestos content and the four stage clearance certification of re-occupation process as defined in HSG264 and HSG248. In the main, our work activities also fall under the requirements of the Control of Asbestos Regulations 2012.
- Consult with our employees on matters affecting their health and safety and working environment.
- Provide and maintain safe plant and equipment.
- Ensure the safe handling and use of substances, particularly those used for asbestos surveying and analysis of air and bulk samples for asbestos content.
- Provide information, instruction, training and supervision for employees in respect of health and safety and environmental management.
- Ensure all employees are competent to do their tasks and to give them adequate asbestos related training as required by the Control of Asbestos Regulations 2012 and other supporting legislation as appropriate.
- Prevent accidents and cases of work related ill health so far as is reasonably practicable.
- Maintain safe and healthy work conditions for all employees
- Evaluate and monitor sound health and safety driving practices throughout our vehicle fleet operations whilst considering the environmental impact.
- Review and revise this policy as necessary and annually from the date below.

Director's signatures

James Riley



Dated

21/01/2018

Richard Powner



Dated

21/01/2018

Mark Harvey



Dated

21/01/2018

Stefan Osina



Dated

21/01/2018

Danny Kirbyshire



Dated

21/01/2018

David Poulter



Dated

21/01/2018

Jamie Stevenson



Dated

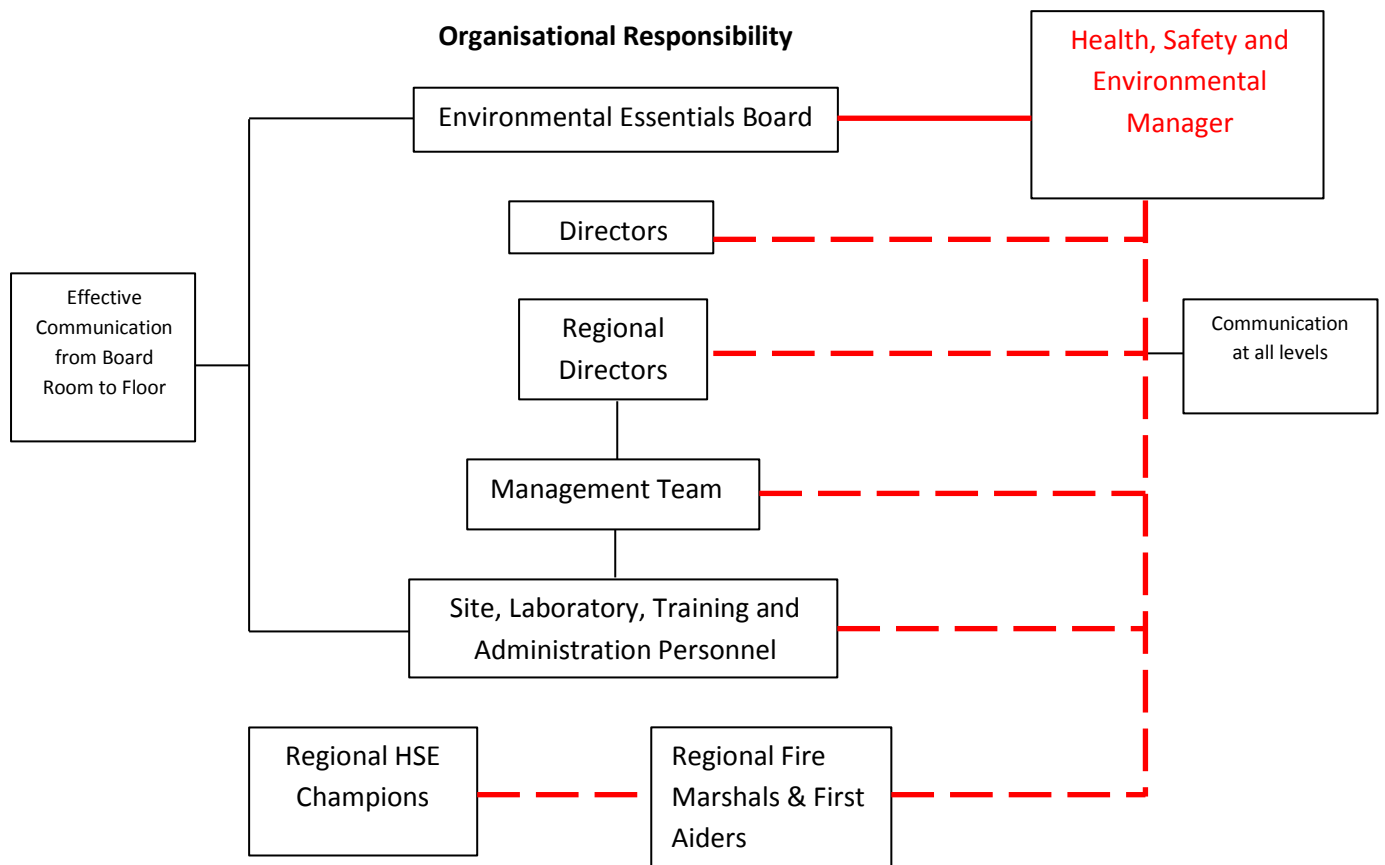
21/01/2018

3. Organisational HSE Structure and Responsibilities

Although overall responsibility for health, safety & environmental management rests with EEL Board, it recognises that all Directors, Managers, Supervisors and employees at all levels are required to accept their responsibility for implementation of this policy as far as it affects their working environment and to discharge their duties ensuring:

- Their acts or emissions at work do not jeopardise other persons, plant, premises or the environment
- They co-operate so far as is necessary
- They do not recklessly interfere or misuse anything provided in the interests of health and safety or environmental management
- They observe safety signage
- Safe use of plant and equipment
- Accidents, near misses and other safety concerns are reported in a timely manner following EEL procedure
- They drive company vehicles safely and with consideration for environmental impact, ensuring any allocated company vehicle is maintained

EEL understands that an effectively planned, organised and controlled approach to health, safety and environmental matters is sound management practice underpinned by the system of internal control, effective staff involvement, participation, communication and consultation.



Individual Responsibilities

This section of the policy sets out the responsibilities of EEL Directors, Managers and Supervisors so that they may recognise their part to play in developing EEL strategies to reduce the number and minimise the level of accidents / incidents in the workplace for all employees at all EEL premises or premises for which EEL is responsible or contracted to work on. These strategies will be supported by effective reporting arrangements to assess trends and comparisons of best practice in Health, Safety and Environmental management.

EE Board

The Board recognises the primary responsibility that is placed on them as the 'employer' under the HASAW etc...Act 1974, as they directly control the factors which influence working conditions and environmental impacts of the business.

The EE Board must therefore ensure that it has suitable and sufficient arrangements in place for fulfilling their responsibilities and for the monitoring and updating of their responsibilities. In order to comply with this, individual members of EEL have been assigned specific responsibilities to ensure that this is achieved.

In addition to the safeguarding of all employees of EEL this responsibility also extends to clients, visitors, trainees and all other persons whilst on EE premises or premises for which EE is responsible and all persons other than EEL employees undertaking work on such premises by virtue of a contract of services.

The Board fully endorse this policy and its statement of intent, which clearly commits EEL to the principles of current Health, Safety and Environmental Management legislation.

The Board will receive monthly reports on the current status of health safety and Environmental matters at EEL. This will allow them to make an informed judgment on the adequacy of current systems and resources.

A member of the board will champion Health & Safety and Environmental Management, providing assistance to the Board on the delivery of the health, safety and environmental Policy. This will be The Director of Quality.

The Board is responsible for establishing objectives, policy, priorities and the allocation of funds in respect of Health, Safety and Environmental Management, to ensure the HSE manager is provided with adequate financial and physical resources to fulfil their role and ensure compliance

Directors

The EEL Directors will be ultimately responsible for ensuring that EEL complies with and adheres to the requirements of HASAW etc...Act 1974 and the relative statutory provisions relating to both Health, Safety and Environmental requirements, all relevant fire safety legislation such as the Regulatory Reform Fire Safety Order 2005, this policy and all procedures that comprise the organisations Health, Safety and Environmental framework. The Directors main responsibilities are:

- Ensure the appointment of a competent person(s) to oversee health, safety and environmental management across the organisation i.e. head of health, safety and welfare or health and safety manager, inline with sections 6 & 7 of the Management of Health and Safety at Work Regulations 1999.
- To ensure that competent persons are nominated within each Region to deal with serious and imminent danger and to implement emergency procedures as necessary for which the nominated persons will manage with support from the HSE manager.

Senior Management Team

It is the responsibility of all senior management to:

- Ensure that the HSE Policy is implemented within their regions.
- Have a good in depth knowledge of the requirements of all statutory health and safety regulations pertinent to their area of responsibility.
- Ensure the existence, implementation, monitoring and review of Health, Safety and Environmental procedures within their region so far as is reasonably practicable by undertaking suitable and sufficient risk assessments, with support from the HSE manager.
- Assess priorities for health, safety and environmental action at their service level and subsequently initiate that action and where appropriate, report the need for any further action to HSE manager
- Ensure that their managers and employees within their regions are suitably and sufficiently trained in all aspects of health, safety and environmental matters that impinge on their work, and that all managers and employees are provided with necessary information, instruction and supervision to allow them to comply with their legal obligations under current statutory legislation and this policy.
- Ensure that adequate arrangements are in place for health, safety and welfare visits and records kept for auditing purposes.
- Ensure that they inform the HSE manager of any incidents including near misses so that they are reported and investigated under the Reporting of Injuries Diseases and Dangerous Occurrence Regulations 2013 (RIDDOR).
- Promote a positive health and safety culture by personal example by adhering to this policy , site safety regulations at all times and by wearing personal protective equipment when required on site
- Take appropriate action where any employee has failed to satisfactorily discharge their duties and responsibilities allocated to them in respect of health safety and environmental matters.

Health Safety & Environmental Manager

The Health Safety & Environmental Manager will:

- Develop and promote a safety culture and philosophy, which permeates into all activities undertaken and reaches all personnel involved in them.
- Undertake the day to day management of health and safety and environmental management as delegated by the Board.
- Ensure suitable channels of communication will be available to all employees so that health safety and environmental matters are identified and programmed for action.
- Ensure training requirements are identified by working closely with the Regional Management teams and the Quality/Technical managers to ensure any site specific training or recognised training for plant and equipment is undertaken.
- Ensure suitable and sufficient first aid provisions are available.
- Ensure all risk assessments, safe systems of work and policies will be reviewed regularly in line with changes to health safety and environmental legislation and industry best practice.
- Ensure that all relevant reportable accidents and near misses are fully investigated.
- Ensure client sites are periodically audited and inspected to ensure compliance with all necessary legal provisions and our own policies and procedures.
- Liaise with the HR manager where and when necessary to review policies and procedures.
- Ensure all new starters are provided with a health and safety induction.

Operational Site Personnel

All employees are required to:

- Follow the risk assessment process and complete all required paperwork, electronically record the site risk assessment, and report any additional hazards identified when arriving on site. Report bad practice and report workplace hazards before starting work.
- Act safely at all times whilst at work, ensuring that their undertakings do not introduce any unsafe situations.
- Use all equipment provided for the purposes of health and safety in a safe manner and following the methods of training they have received for such equipment, i.e. MEWPS.

Employees nominated with company vehicles must ensure that they maintain their vehicles in the required manner. Monthly vehicle inspections must be completed by the driver using Fleetcheck. These will be reviewed by the fleet manager for action if appropriate.

4. Procedures for Health, Safety and environmental Management

EELs health and safety procedures and environmental management procedures comprehensively cover our arrangements for health, safety and environmental matters that enable us to manage risk within our premises regionally and throughout our site activities on client's premises.

We have a library of robust procedures in place for health, safety and environmental management that all of our staff are required to adhere to and work inline with. The procedures underpin our risk assessments which are fully encompassing of any hazards that we may encounter through the discharging of our common duties.

The Health and Safety procedures manual and The Environmental procedures manual can be requested from the HSE Manager.

5. Planning and Implementation of Policy

EEL recognises that we must have a planned and systematic way of implementing the HSE policy through an effective health and safety management system. EELs HSE policy commits to two aspects of planning:

Corporate planning - (Strategic H&S review at Board meetings) – which is concerned with establishing and maintaining the HSE policy, organisation of HSE management and culture necessary for effective risk control.

Operational planning - (HSE Committee) - which is concerned with the assessment of risks arising from the organisations activities, establishing and maintaining comprehensive risk control systems and reviewing performance across all regions.

Annually, the HSE manager and Director of Quality, through the HSE Committee, shall produce a development/objective plan to ensure that the EEL HSE systems , procedures and performance standards are suitable and sufficient to meet its legal and best practice obligations.

Standard HSE procedures exist for general activities within EEL to cover best practice and to comply with current legislation. These procedures will be updated as legislation requires or on further advice from the HSE manager. It is the responsibility of line managers to ensure through close working with the HSE manager that they ensure all staff under their management are familiar with and adhere to all EEL HSE procedures.

These procedures are for general guidance and are underpinned by the generic risk assessments. Site / task specific information on any particular procedure can be obtained from EEL HSE manager.

EELs HSE management policy and supporting procedures are communicated to all staff in several ways, including, but not limited to:

- HSE induction
- HSE training and tool box talks
- HSE meetings
- HSE notice boards
- HSE pages on the staff intranet

EEL set out strict levels responsibility for their management teams to implement the HSE policy and procedures within their regional teams and to ensure they have been understood and adhered to.

Any employee not adhering to or willingly disregarding the HSE policy or procedures will potentially face disciplinary actions.

6. Monitoring of HSE Management

EEL actively monitor HSE performance within the organisation to ensure continued compliance with current HSE legislation and internal policies and procedures. This monitoring process allows EEL to gain and review quality feedback on performance.

EEL **proactively** achieve this by:

- Systematic inspection of premises, tasks and equipment
- Periodic audit ; both internal and external
- Direct observation of work and behaviours of all employees
- Monthly reports and an overall annual report to the EEL Board on HSE performance.

EEL **reactively** achieve this by:

- Investigating cases of injuries and ill health and performing root cause analysis
- Investigating weakness or omissions in performance standards
- Investigating breaches of legislation and internal policy / procedure

7. Auditing of HSE Management

As part of EELs commitment to HSE management, continual auditing of the HSE management system provides the feedback loop which enables reinforcement of the policy and reassurance to the Board. Whenever reasonably practicable, EEL actively reduce risk to ensure the continued effectiveness of the HSE management system and compliance with current HSE performance standards, legislation and best practice.

The process which EEL follows in order to audit health and safety policy, procedures and performance is to:

- Review our risk management procedures to ensure they are working effectively to identify all potential HSE hazards within and effecting the organisation.
- Ensure hazard identification, risk assessment and risk management processes are carried out and owned by competent persons.
- Identify that HSE objectives which are set out annually have been met or exceeded. This is communicated to Board via the Quality Director.
- Evidence that the EEL management teams own the duty of ensuring that HSE promotion is communicated from 'top to bottom'.
- To demonstrate through practices and procedures that HSE management is the responsibility of not just EEL, but all EEL employees; as detailed in the responsibilities section of this policy.

8. Review of HSE Management

In order for informed judgments to be made on the adequacy of arrangements and resources in place for HSE management, EEL review their HSE management system and procedures regularly via:

- EEL Board - Quarterly
- HSE Committee – Monthly
- HSE team meetings – Weekly
- HSE Champion Regional meetings – Quarterly

Daily performance is reviewed by responsible managers and the HSE manager.

Individuals receive feedback on their HSE performance as part of their annual appraisal and 1:1 meetings with managers.

The HSE policy is reviewed no less than annually by the HSE manager with approval and sign off at Board.

9. Consultation with Employees

In accordance with the Health and Safety (Consultation with Employees) Regulations 1996 the Board of Directors will consult directly with all employees via the HSE manager, who will ensure any matters for consultation are brought to their attention either directly or via their line manager.

All employees are actively encouraged to raise points of concern or suggestions for improvement with regards to health and safety matters at Environmental Essentials. Regular health and safety meetings will take place as detailed below.

The Health and Safety and Environmental Committee meetings will take place regularly and will be chaired by the HSE manager. The main purpose of this meeting is to ensure that all elements of the HSE policy are being implemented and audited to ensure compliance and continuous improvements. There are terms of reference set for the committee and these set out the aims of the committee and are reviewed periodically and following any changes to membership.

The committee discuss health and safety performance, environmental impacts and effects and measure performance against industry best practice. Decisions and action plans will normally require the full endorsement of a company Director, one of whom will be present at each meeting.

Information and Instructions for Employees

The poster entitled 'Health and Safety Law – What you should know' is to be prominently displayed in each office including regional offices.

All new employees will receive suitable and sufficient health and safety inductions before being released for any work whether this is site, laboratory or office based. Records will be held via the quality manager.

The training and development manager and HR team is to ensure that any young persons or trainees who are working at the company are provided with proper supervision according to their respective roles at all times. The

Board of Directors will ensure that Environmental Essentials employees, who are working under the control of other employers, or clients, are given relevant health and safety information and instructions as necessary.

10. Risk Assessments

In accordance with the Management of Health and Safety at Work Regulations 1999, Regulation 3, generic risk assessments are to be completed by the HSE manager and reviewed no less than annually.

We have a bank of generic risk assessments relating directly to the common hazards we can be exposed to during the course of our business activities, these risk assessments set out the control measures we have in place to manage the risks that these hazards present.

In addition, we have service related risk assessments as listed below.

- Bulk sample analysis (Laboratory)
- Asbestos surveys (Sampling and Non Sampling Management Surveys / Refurbishment and Demolition Surveys).
- Air monitoring and Four Stage Clearance
- Training

We will undertake site specific risk assessments at the stage of scoping potential projects. These will be assessed by the project managers, with the support of the HSE manager, prior to any work being carried out. These will normally be required in environments outside of usual domestic and commercial sectors (e.g. industrial/offshore) with potential enhanced risks.

Other processes and work activities will be risk assessed to include occupational road risk. The fleet manager will meet regularly with the HSE manager and the HR team to discuss performance and statistics together with best practice.

The full library of risk assessments can be requested from the HSE Manager

11. Emergency Planning and Procedures

Emergency Procedures

A risk assessment will be carried out and reviewed no less than annually to identify the emergency procedures, equipment and physical provision in place for each location where EEL personnel are employed in respect of emergency management. Regional offices, through appointed health and safety champions, will ensure that emergency escape routes are visually checked on a daily basis, a full office fire safety check sheet is completed on a weekly basis and that annual servicing of fire extinguishers is carried out. All records are reviewed by the HSE manager periodically.

Accidents and Ill Health

EEL have external provision in place to support our staff with occupational health issues.

When required, occupational health issues will be managed with the support of this occupational health service.

This process is managed by the HR manager in this first instance, who liaises with employees and managers concerned. Support and advice is sought from the HSE manager as and when required.

When any occupational health issues / concerns are noted during any HSE audits the HSE manager will raise them with the employee's line manager and the HR manager.

First aid boxes are kept at all offices and retained by Emergency First Aiders, and in all company vehicles and mobile laboratories.

Accident books / reporting forms will be kept at all offices. It is the duty of the regional managers to ensure that their nominated appointed persons/ health and safety champions complete the information in the accident book / reporting form. All accidents are to be reported to the HSE manager by the regional managers.

The HSE manager will be responsible for reporting all reportable injuries, diseases and dangerous occurrences to the HSE as required by the Reporting of Injuries and Dangerous Occurrences Regulations 2013.

All accidents / incidents involving work fleet vehicles will be reported immediately to our contracted Accident Management partners and our fleet manager, who will then investigate and liaise with both the HSE manager and HR manager. The HR manager will undertake the direct investigation.

12. HSE Training

EEL believe that one of the most effective ways to reduce incidents and improve HSE quality and performance is to provide a well managed, safe and healthy working environment. EEL achieve this by having in place a training and development regime which ensures all employees have equal access to training, including HSE training, inline with the Health and Safety at Work etc. Act 1974.

In order to support their approach EEL have developed and consistently deliver a comprehensive rolling programme of HSE training; delivered by both accredited external training providers and their in house HSE manager.

HSE training at EEL includes, but is not restricted to:

- HSE induction
- First Aid at work and First Aid Awareness
- Asbestos Management and Asbestos Awareness
- CSCS cards
- Risk Management and assessment
- Manual Handling
- Confined spaces
- Working at Height and ladder safety
- IPAF

EEL consider, where reasonably practicable, training on task specific roles for key individuals, such as IPAF or IOSH Directing Safely. When any new machinery, equipment or processes are introduced, EEL ensure that effected employees received the suitable and sufficient training to ensure their safety.

HSE training is a key element to EELs HSE objectives and is reviewed periodically by the HSE manager.

13. Related EEL Policies

MORR Policy – Management of Occupational Road Risk

Drugs & Alcohol Policy

Disciplinary Policy

NEMRA Policy

PAT Policy

Fire Safety Policy

Working at Height Policy

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