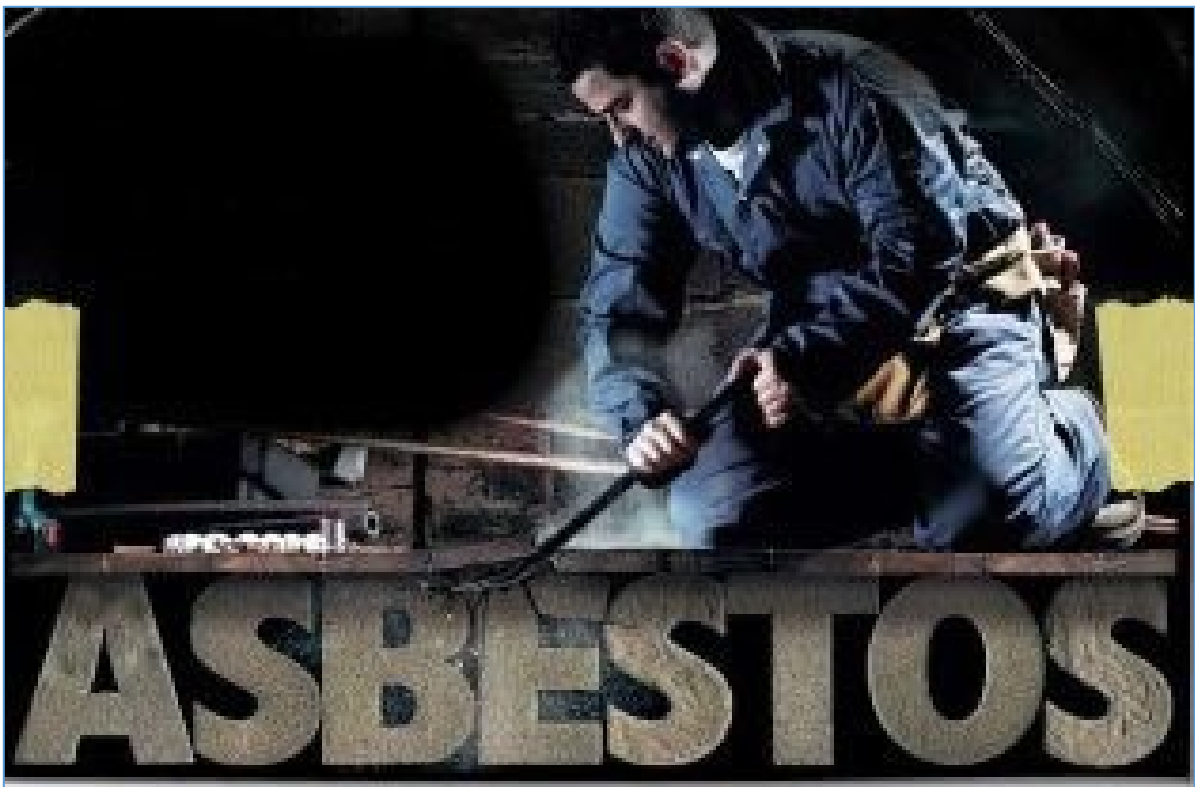


J & E Hall Limited and Associated Companies



Asbestos
Policy and Arrangements



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Abbreviations

The following abbreviations are used in this document:

ACM	Asbestos Containing Material
HSE	Health and Safety Executive
HSQE	Health, Safety, Quality and Environment
NLW	Non-License Works
NNLW	Notifiable Non-License Works
PPE	Personal Protective Equipment
RPE	Respiratory Protective Equipment
Table 1 Abbreviations	

1. Scope

Hazard identification and risk assessment are the basis for introducing practical preventive policies and control measures in the workplace. Information, Instruction, Supervision and Training on the risks, systems of work and the precautions to be taken will be communicated to employees and others who may, in the course of their work for or on behalf of:

- J & E Hall International;
- Daikin Applied Service;
- Coulstock & Place.

That come in to contact with asbestos.

A method statement and risk assessment will be provided to give detailed information on the hazards, risks, and appropriate preventive control measures in order to fulfil J & E Hall International, Daikin Applied Service and Coulstock & Place obligations under the Control of Asbestos Regulations 2012 and the Health and Safety at Work etc. Act 1974.

Adequate information, instruction and training will be given to employees and other persons affected by J & E Hall International, Daikin Applied Service and Coulstock & Place activities to ensure that they are aware of:

- Health risks associated with asbestos;
- Reasons for and the nature of the precautions to be observed to protect themselves and other people who may be affected;
- How to make use of the protective equipment and other safeguards;
- The company's duties under the Health and Safety at Work and associated regulations.

Effective steps will be taken to ensure that all employees are made aware, while working on company premises &/or customer sites, of Asbestos containing material (ACM's) during their work activities that is likely to affect their health, safety & welfare.

To control the risks to employees, building users, contractors and other persons, the following measures will be adopted:

- J & E Hall International, Daikin Applied Service and Coulstock & Place shall cooperate with the building owner/facilities management company to ensure that, as a minimum, a Management survey be carried out at all company locations which, due to their age or nature of construction, are likely to contain asbestos;
- J & E Hall International, Daikin Applied Service and Coulstock & Place shall ensure that an Asbestos Management Plan is developed, maintained and reviewed annually for all property where it is has an obligation to maintain and repair as lessee or tenant. J & E Hall International, Daikin Applied Service and Coulstock & Place shall co-operate with other duty holders under any tenancy arrangement to achieve this objective;
- Where existing properties contain asbestos containing material, which is sound, in good condition and has not been, or is not likely to be subject to abrasion or deterioration, the material shall be left undisturbed, its position and quantity noted in the Asbestos Management Plan / Register and its condition monitored and periodically reassessed.

Where building or engineering works are to be undertaken the Asbestos Survey Information and Asbestos Management Plan for the building will be the first point of reference. Additional site inspections, test results, remedial work or removal of asbestos materials, must be recorded in the Asbestos Management Plan for the property.

The location of asbestos containing materials will be brought to the attention of any person who is likely to disturb the fabric of the property in the course of their work, in particular, maintenance contractors.

Only contractors licensed by the Health and Safety Executive (HSE) will be appointed to undertake removal work with notifiable ACM's falling under the scope of the Control of Asbestos Regulations 2012.

2. Managing Director

The Managing Director is the senior executive of J & E Hall Limited with ultimate responsibility for all aspects of health and safety at work.

They will ensure that there:

- Is an effective Company Policy in place and that there is an adequate organisation and arrangements to ensure that this policy is implemented throughout the Company;
- Are the necessary arrangements to monitor the effectiveness of the policy and will report to the Board on all matters relating to Asbestos at work.

The responsibility for managing asbestos related issues at work will be delegated to the J & E Hall Senior Managers / Managers.

2.1. Senior Managers and Managers

The Managers will be responsible for issues relating to asbestos within their business group, the health, safety and welfare of all employees under their control and will ensure that health and safety receives equal priority with all other managerial responsibilities and that there is full compliance with relevant legislation. They will ensure in particular that there are adequately documented procedures for establishing and auditing standards, which will include:

- Planning;
- Information, Instruction & Training;
- Safe Work Instructions;
- Document Control;
- Waste Disposal;
- PPE.

2.2. The Company Health, Safety Quality and Environmental (HSQE) Manager

The Company HSQE Manager reports directly to the HR Director.

The HSQE Manager will work with the elected employee safety representatives to ensure compliance with Company policies and standards.

They will:

- Prepare reports on Health and Safety matters and prepare accident statistics on a monthly and annual basis;
- Advise the Company in respect of Health and Safety at work and will develop initiatives in conjunction with the Senior Manager;
- Ensure that the procedures for accident reporting and investigation are properly enforced;
- Organise the Company Safety Committee meetings and make recommendations for Company Policy.

Where appropriate liaise with:

- Government Agencies, Employers', and Trade Associations;
- The 'Corporate Manger' on property and liability matters.

2.3. **Company Safety Committee**

The Company Safety Committee will meet under the Chairmanship of the HSQE Function and will meet as a minimum annually.

2.4. **Employees**

All employees are responsible for acting responsibly and ensuring that their acts or omissions do not endanger or harm themselves or others. All employees are required to follow the asbestos safe work instructions & control measures identified in risk assessments.

2.5. **Sub-Contractors**

All sub-contractors are responsible for acting responsibly and ensuring that their acts or omissions do not endanger or harm themselves or others. Only contractors licensed by the Health and Safety Executive (HSE) will be appointed to undertake removal work with notifiable ACM's falling under the scope of the Control of Asbestos Regulations 2012.

3. **Introduction**

This policy has been generated to identify the responsibilities and arrangements for all employees and duty holders, to comply with the Control of Asbestos Regulations 2012.

This policy will assist all employees when they are working with asbestos-containing materials (Identified or Suspected).

Most work with asbestos-containing materials, including lagging, insulation, and insulating board, must be done by an HSE-licensed contractor.

This Policy covers work that does not need a licence (NLW) and notifiable non-license works (NNLW) when carried out under the exemption of Regulation 3.2 CAR2012 also as the task sheets HSG210 describe.

The Policy, describe 'good practice' for a particular task and covers the action needed to reduce exposure risk to an acceptable level.

For advice on whether the works are NLW or NNLW a simple "Decision Flow Chart" is detailed on the HSE's Asbestos Essentials Guidance Sheet – a0, refer to Fig 1.

3.1. **What is Asbestos and Why is it a Problem?**

Asbestos is a naturally occurring fibrous material that has been a popular building material since the 1950s.

It is used as an insulator (to keep in heat and keep out cold), has good fire protection properties and protects against corrosion.

Large amounts of asbestos were used in new and refurbished buildings before 2000. Usage began to decline in the 1970s.

- Blue asbestos (Crocidolite) had a voluntary ban in 1970;
- Blue and brown (Amosite) asbestos were banned by law in 1985;
- Uses of white asbestos (Chrysotile) were banned in 1999;
- Everything else and most second-hand supply (except for very high-performance materials) was banned by 2000.

A large number of premises still contain some form of asbestos.

Workers most likely to be exposed to asbestos-containing products are those in the construction, maintenance, refurbishment, and related trades.

When asbestos materials are damaged or disturbed, they can release dangerous fibres which, if breathed in, can cause serious diseases.

Around 4000 people in Great Britain die every year from asbestos-related diseases, making asbestos the single greatest cause of work-related deaths.

Regulation 4 of CAR2012 places a legal duty on the premises owner (client or duty holder) to identify, quantify, record and manage asbestos containing materials and needs to tell you where any asbestos-containing materials (or materials presumed to contain asbestos) that you are likely to meet are and their condition, guidance is given in L127 and HSE227.

Asbestos essentials provides the information you need to help you recognise asbestos and protect yourself.

3.2. Does The Work Need a Licence?

Normally, non-licensed work includes work on asbestos containing textured coatings, asbestos cement, and certain work of 'short duration' on asbestos insulating board.

'Short duration' means any one person doing this type of work for less than one hour, or more people doing the work for a total of less than two hours, in any seven consecutive days.

The total time spent by all workers must not exceed two hours.

This includes time spent setting up, clearing up and cleaning.

4. Auditing and Monitoring

The Company has effective arrangements for the auditing and monitoring of Policy, Procedures and Activities pertaining to compliance to the Control of Asbestos Regulations 2012.

4.1. Sub-Contractors

The Company will ensure that there are comprehensive and effective arrangements in place for controlling sub-contractors engaged by the Product Groups.

These will include proper vetting of contractors to determine their competence and quality of service and to ensure that they carry sufficient public liability insurance cover.

Business Groups must ensure that before any major contract is agreed that the contractor has been fully acquainted with the J & E Hall Limited contract conditions and has provided a proper method statement

The Sub-contractor must have shown how the work is to be carried out safely without adversely affecting the health and safety of his own employees, J & E Hall employees or the general public.

The contract conditions may need to be supplemented from time to time to draw attention to any special conditions which may be necessary and which may include the need for permits to work.

These arrangements should also ensure that responsibility for monitoring the contract is assigned to a manager of suitable status to ensure that the contractor observes the agreed conditions.

Only contractors licensed by the HSE will be appointed to undertake removal work with asbestos falling under the notifiable scope of the Control of Asbestos Regulations 2012.

4.2. Safety Representatives and Safety Committees

The HSQE Function effectively review these processes and activities every three years and identify where applicable any opportunities for improvement.

In addition, they will review the company arrangements to ensure compliance to the applicable legislation and monitor any amendments.

In those cases where recommendations are not agreed or accepted, then the Company HSQE manager will advise the Senior Manager.

Situations, which are not able to be resolved at Senior Management level, will then be referred to a J & E Hall Director or to the Managing Director.

4.3. Disposal of Waste

'Hazardous' or 'Special' waste needs safe disposal.

This includes:

- Asbestos;
- Materials containing asbestos;
- Anything contaminated with asbestos categorised as Class 9, unless fully decontaminated.

Make sure all asbestos waste is double-bag and labelled 'asbestos waste compliant to schedule 2 CAR2012'.

Asbestos waste will be safely carried to the waste facility via a consignment note as per regulation 24 and schedule 2 of CAR2012 For advice on disposal contact the HSQE Function and reference HSG210 section em9.

4.3.1. Key Points

Personnel need training to work safely with asbestos-containing materials:

- Only go ahead if they are sure the work does not require a licence;
- Work with, or disturbance of, any type of asbestos containing material can be dangerous;
- Second-hand equipment may not be asbestos-free;
- There is a much greater risk of lung cancer when people work on asbestos-containing materials, and they smoke;
- Consider those around you;
- Don't put your workmates in danger or take fibres home on your clothes and put your family at risk;
- Carry out the work and dispose of contaminated materials safely.

4.4. Consultation

Consultation will be established at all levels on issues pertaining to the Control of Asbestos Regulations 2012.

4.5. Provision of Welfare Facilities.

The Company will adhere to all regulations laid down in the Workplace (Health, Safety and Welfare) Regulations 1992 and the Control of Asbestos Regulations 2012.

All Company work areas will provide adequate welfare facilities, maintain them in a satisfactory condition to ensure a safe and healthy working environment for employees and any persons visiting any J & E Hall Limited work premises or controlled sites.

The Company places a general requirement on itself and any employees in control of a workplace or workstation to ensure that all areas and locations, where staff are employed comply with the regulations.

5. Planning and Preparation

If you are working on non-domestic premises, the manager / duty holder of the premises has responsibility for protecting people who work there. Ask to see a management plan and check what asbestos is present via the building register.

If you are unsure, assume any material you need to disturb does contain asbestos.

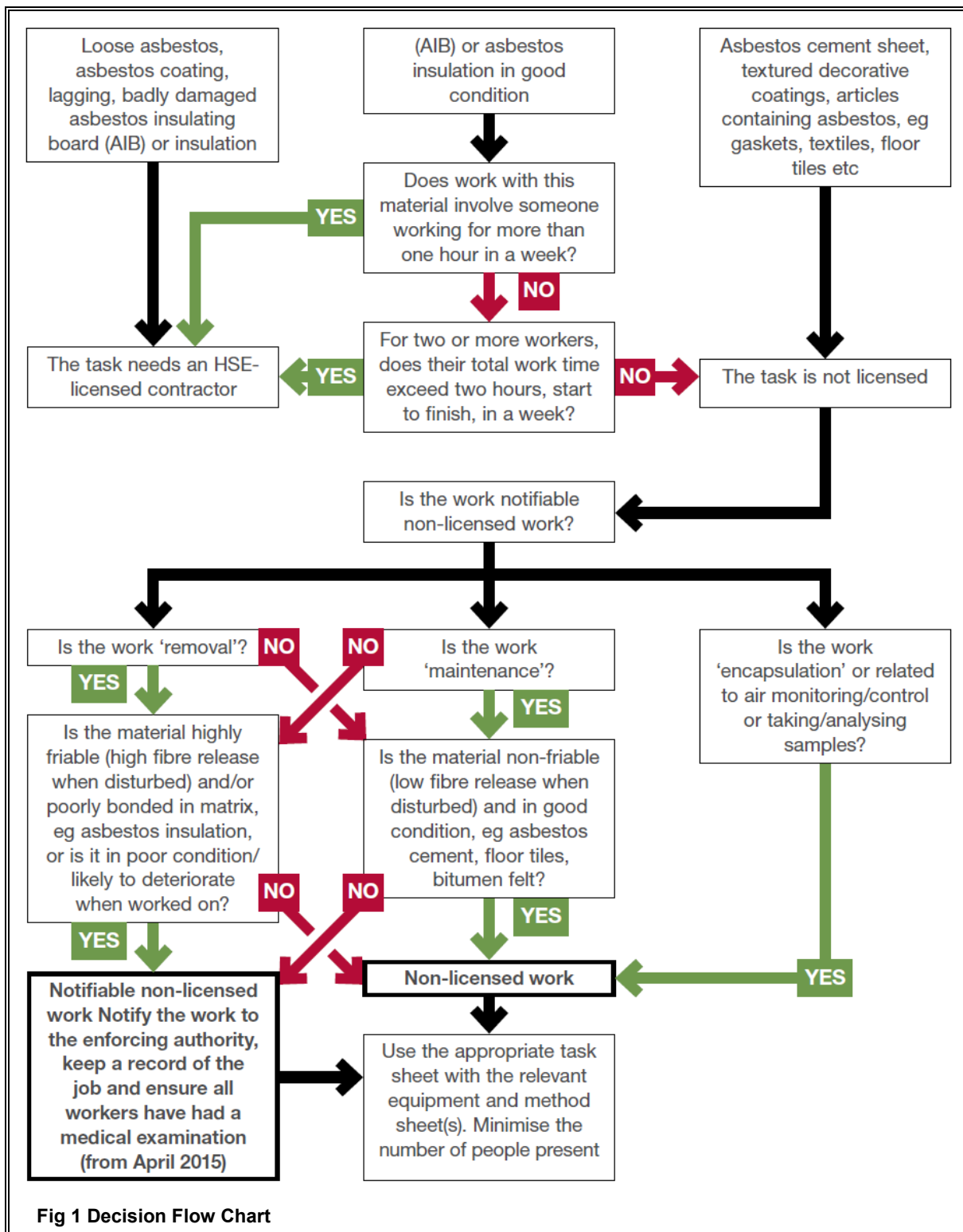
The client also needs to see your plan of work to understand what work you are going to do, and how.

Before carrying out any work your line manager is responsible for the following actions:

- Ask the premises owners for their building register for asbestos; what was checked, what was found, and what was not checked;
- If there is no record and you have reason to suspect asbestos, ask for an asbestos survey to be done before accepting the contract;
- Check if the work could require a licence;
- When a licence is not needed for the work, check to see if it is NNLW, refer to Fig 1 and / or contact the HSQE Function for advice;
- Follow all applicable task sheets or other HSE guidance;
- If there is no task sheet for the work, get help from the HSQE Function;
- If asbestos-containing material needs replacement, the replacement must be asbestos-free;
- Prepare a method statement.

Make sure it includes the following:

- What is involved, where the work is, and how long it is likely to last;
- The address and description of the job; when the work will be done;
- The procedures to follow to reduce exposure and prevent the spread of asbestos;
- The equipment needed, including PPE;
- Decontamination and waste disposal arrangements and emergency procedures;
- What to do in the case of emergencies and accidents.



6. Planning and preparation

- Plan for and practice emergency procedures;
- Workers need to be fit tested to make sure that the RPE fits them properly;
- Arrange fit testing and training before the work starts;
- RPE must have identification tags.

7. Personal / Respiratory Protective Equipment

7.1. Overalls

- Disposable overalls. Class 3 Type 5 (BS EN ISO 13982-1) are suitable.

NOTE: Cotton overalls hold dust and need specialist laundering.

- Waterproof overalls for outdoor work may be needed;
- Wear one size too big - this will help to prevent ripping at the seams;
- If the cuffs are loose, seal them with tape;
- Avoid wearing a long-sleeved shirt - these are difficult to cover properly;
- Wear the overall legs over footwear. Tucking them in will let dust into footwear;
- Wear the hood over the RPE straps;
- Dispose of used overalls as asbestos waste.



Never take used overalls home.

7.2. Gloves

- Use single-use disposable gloves. If latex gloves are needed, use only 'low protein powder-free' gloves;
- Dispose of used gloves as asbestos waste.

7.3. Footwear

Boots are preferable to disposable overshoes, which cause a slipping risk.



Never use laced boots unless laces are taped up and sealed as these are very difficult to clean properly.

7.4. Respiratory Protective Equipment (RPE)

Use suitable RPE with an Assigned Protection Factor of 20 or more;

Suitable types of RPE:

- Disposable respirator to standards EN 149 (type FFP3);
- EN1827 (type FMP3);
- Half mask respirator (to standard EN 140) with P3 filter;
- Semi-disposable respirator (to EN405) with P3 filters;
- Engineers Ammonia half face respirator masks with ABEK 2 P3 filters.

This equipment should be suitable for most short duration non-licensed work. Workers must select a make and size that fits them.

Some equipment is not suitable for people with beards or stubble.

For longer periods of continuous use, powered equipment should be used.

7.5. Using RPE

- Workers must be medically fit to wear RPE – seek medical advice if you are not sure;
- RPE must be serviceability checked prior to each use;
- All types of RPE restrict what the wearer can do. It is uncomfortable to wear for long periods;
- The RPE has to be worn all the time and until the worker is away from the contaminated air;
- Fit and wear the respirator in accordance with the manufacturer's instructions;
- Place the straps firmly around the top and back of the head. The respirator should be tight against the face;
- When using disposable RPE, pinch the top of the respirator over the nose;
- Carry out a fit check in accordance with the manufacturer's instructions;
- If the worker wears spectacles, they must not create a gap between the mask and face;
- Put the overall hood over the straps;
- At the end of the task, take off RPE last and, if it is disposable, dispose of as asbestos waste. If it is an OriNasal type, cap or flood the filters, decontaminate, clean, and store it properly for the next use;
- With OriNasal / half-mask type change filters regularly - your supplier may be able to advise you how often. Dispose of used filters as asbestos waste.

NOTE: For some tasks, non-disposable RPE is needed.

7.6. Maintenance of Non-Disposable Equipment

- Keep RPE clean and in good working order - follow the manufacturer's instructions;
- Inspect and check RPE for damage before use;
- Carry out thorough checks monthly (or every three months if used infrequently) and document inspections. Inspect all parts including valves and seals;
- Replace the respirator as appropriate;
- Clean RPE after use and store in a safe place away from contamination.

8. Training

Asbestos Awareness Overview shall be covered and discussed with all new employees during their stage two inductions.

Further Asbestos Awareness Training will be provided to all identified employees. This will be in the form of classroom training either by the HSQE manager or an identified and approved specialist training provider.

Training includes detailed information on:

- Recognising Asbestos;
- How Asbestos can affect your health;
- The added dangers of smoking;
- The uses and likely locations for asbestos in buildings;
- What work you are allowed to do by law;
- What the law requires you to do;
- Procedures to protect yourself;
- What methods to use;
- What equipment you need to do the job properly;
- How to choose, use and look after personal protective equipment;
- Recognising and dealing with other dangers, such as work at height;
- Decontamination of yourself if you were to come into possible contact;
- Emergency procedures;
- Waste disposal.

Refresher training will be given every 3 years.

Those persons who require only awareness training could have refresher training as part of other Health & Safety updates or more often if:

- Risk Assessment identifies further or specific issues;
- Any recorded incidents;
- Work methods change;
- The type of equipment used changes;
- The type of work changes a lot.

Make sure that RPE users know how to:

- Check their equipment is working properly before they put it on;
- Check that it fits;
- Identify and replace worn or defective parts.

Ensure they know about the limitations of the RPE they are using.

Instruct users to throw away disposable RPE/PPE as asbestos waste after one use.

Instruct employees to stop work and leave the area if they think their RPE is not working properly.

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