

**ASBESTOS POLICY**

# **Trinitas Contracts Ltd**

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And is fully supported by them until: 22nd February 2011

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## **INTRODUCTORY NOTE**

This section contains the company's policy statement together with the health and safety organisation and the responsibilities allocated to individuals.

## **COMPLIANCE REVIEW**

Trinitas Contracts Ltd's asbestos policy shall be formally reviewed regularly by an independent auditing company to ensure the company is in compliance with the requirements of health and safety and asbestos legislation in place at that time.

Additionally, the policy shall be reviewed as necessary to reflect any changes in legislation, appointments or working methods and materials used.

## **SAFETY PROGRAMME**

The review of the safety programme shall ensure that the company is in compliance with the policy. This review shall check that:

1. All the responsibilities allocated in the policy are understood and are being performed.
2. Records, as required in the policy, are being adequately compiled and retained.
3. All the necessary reports are being prepared and forwarded to the relevant persons within the company and the relevant enforcing authorities.
4. The attitude to health and safety of both management and employees.
5. The effectiveness of the training carried out and the requirements for further training.
6. The effectiveness of the policy to reduce the incidence of accidents, incidents, dangerous occurrences and ill health in the workplace.

The results of the review shall be compiled into a report for the Directors and shall include recommendations of the action to be taken to rectify any non-compliance.

## Trinitas Contracts Ltd

# Asbestos Policy Statement

In accordance with its duty under Section 2(3) of the Health and Safety at Work etc. Act, 1974, and in fulfilling its obligations to both employees and the public who may be affected by its activities, the Directors of Trinitas Contracts Ltd has produced the following statement of policy in respect of health and safety.

It is our aim to ensure the health and safety of all Trinitas Contracts Ltd employees wherever they have been placed and whether in temporary or full time employment.

All employees on their part are encouraged to contribute actively towards achieving a work environment that is free of accidents and ill health. We shall discipline any employee who intentionally or recklessly interferes with or misuses anything provided by us or our clients in the interests of health, safety or welfare.

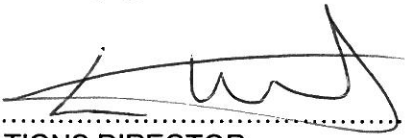
We undertake to discharge our statutory duties by:

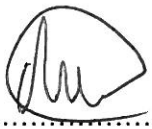
- Ensuring that all workplaces where Trinitas Contracts Ltd employees are working are managed and organised so as to ensure the safety of Trinitas Contracts Ltd employees whether on secondment or direct employment.
- Providing a healthy and safe working environment with adequate facilities and arrangements for welfare at work.
- Ensuring that regular inspection of working areas are undertaken to ensure compliance with health and safety legislation.
- Ensuring competent supervision is provided to ensure safe working practices are followed by Trinitas Contracts Ltd personnel.
- Providing adequate information, suitable instruction, training and supervision to enable all employees to carry out their work responsibilities.
- Ensuring that the appropriate personal protective clothing and equipment is provided to Trinitas Contracts Ltd employees.
- Consulting with employees to ensure best possible working practices and effective provision and dissemination of health and safety information.
- Implementing suitable accident investigation and reporting procedures, and appropriate corrective actions to help prevent recurrence.
- Ensuring every employee understands they have a duty under Section 7 of the Health and Safety at Work Act 1974 to take reasonable care for their own safety and the safety of others who may be affected by their acts or omissions at work.

Copies of this statement will be provided to all employees at induction training and copies of the Asbestos Policy will always be made available for reference at the company office and established site offices.

To ensure the safety of asbestos removal operatives on placement sites, a representative of Trinitas Contracts Ltd will visit a sample number of sites and carry out an audit to verify compliance with the current asbestos legislation.

Our Asbestos policy will be reviewed annually to monitor its effectiveness and to ensure that it reflects changing needs and circumstances.

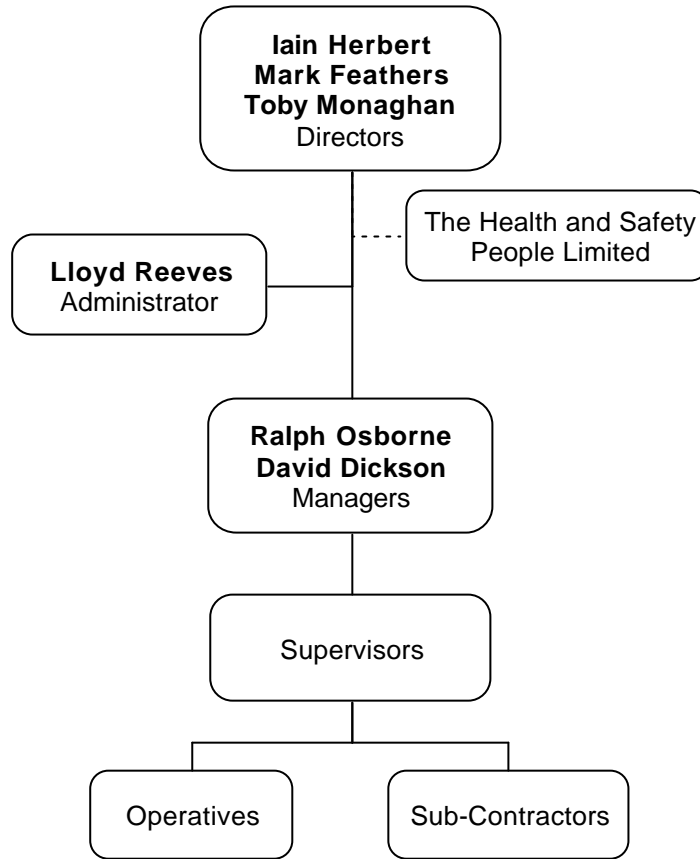
Signed  ..... Date: 23/3/10  
OPERATIONS DIRECTOR

Signed  ..... Date: 23/3/10  
SALES DIRECTOR

Signed  ..... Date: 23/3/10  
CONTRACTS DIRECTOR

Trinitas Contracts Ltd

# Management Structure for Asbestos Works



**Trinitas Contracts Ltd**  
**Responsibilities for**  
**Health and Safety**

**Iain Herbert, Mark Feathers and Toby Monaghan, Directors**

The **Directors** are responsible for the operation of the company and for the implementation of this policy. Their specific Health and Safety responsibilities are to:

1. Ensure the policy is effectively implemented, monitored, developed and communicated effectively to all staff and ensure all necessary reviews are undertaken to reflect changes in legislation, industry best practices and company development;
2. Ensure that the necessary finance is allocated for the development and maintenance of safe systems of work, which shall include the provision of adequate funds for equipment, training, monitoring the effectiveness of the policy and for the provision of adequate welfare facilities for employees;
3. Ensure that a suitable written plan of work detailing how the work is to be carried out is produced;
4. Ensure that notification of the project to the HSE is made on the appropriate form (ASB5) at least 14 days prior to the proposed works start date or application for "waiver" is made as necessary;
5. Ensure that appropriate insurances are in place and maintained;
6. Ensure that all conditions of the Asbestos License are adhered to at all times;
7. Ensure that an effective programme of training is established for employees;
8. Establish objectives against which the safety management system can be actively measured;
9. Generally review the company's health and safety activities and to include a statement regarding health and safety in the company's annual report.

## Ralph Osborne and David Dickson, Managers

The Health and Safety responsibilities at the **Managers'** level are to ensure that:

1. They understand the company's Asbestos policy and understand their responsibilities;
2. They actively leads the implementation of the Asbestos policy;
3. They consult with employees and encourages the reporting of hazards;
4. A suitable written plan of work detailing how the work is to be carried out is produced;
5. Notification of the project to the HSE is made on the appropriate form (ASB5) at least 14 days prior to the proposed works start date or application for "waiver" is made as necessary;
6. Risk Assessments are carried out and used to establish Safe Systems of Work and that these safe systems of work are implemented and explained to employees;
7. Any hazardous substances used in relation to works with asbestos are stored, transported, handled and used in accordance with their Material Safety Data Sheets and COSHH Assessments;
8. All plant and equipment used are suitable and sufficient for the task; that the operators are adequately trained and competent to use them and that appropriate inspections have been carried out and certification issued;
9. Adequate supervision is in place to ensure that Safe Systems of Work are correctly implemented;
10. Management are informed of all health and safety issues they cannot rectify;
11. All accidents, incidents, ill health, dangerous occurrences and other issues concerning safety raised by anyone at work are recorded and investigated such that effective controls can be implemented to help prevent recurrence;
12. Personal protective equipment is readily available and maintained, and relevant employees are aware of its correct use, storage and procedures for replacement;
13. Copies of the daily asbestos exposure records are kept for all personnel and that these records are placed on file;
14. Copies of asbestos removal operatives' daily and six monthly RPE maintenance and inspection records are maintained.

## **Lloyd Reeves, Administrator**

The Health and Safety responsibilities at the **Administrator's** level are to ensure that:

1. He understands the company's Asbestos policy and understands his responsibilities;
2. All the appropriate medical, training, RPE maintenance records (where applicable) and face fit certificates are obtained, verified and entered onto database;
3. Copies of the operatives daily RPE maintenance and inspection records are kept;
4. Copies of the daily asbestos exposure records are obtained from clients for all placed personnel and that these records are placed on file for forty years or until the employee reaches 80 years of age;
5. Personal protective equipment is readily available and maintained, and relevant employees are aware of its correct use, storage and procedures for replacement.

## **Asbestos Supervisors**

The Health and Safety responsibilities at the **Asbestos Supervisors** level are to ensure that:

1. They understand the company's asbestos policy and understand their responsibilities;
2. They understand and effectively communicate all information contained with the Risk Assessments, COSHH Assessments and plans of work relating to removal, repair and encapsulation of asbestos containing materials;
3. Persons under their control are adequately trained and competent to carry out their work and to operate all plant and equipment in a safe manner;
4. They consult with employees and encourage the reporting of hazards;
5. Risk Assessments are carried out and used to establish Safe Systems of Work and that these safe systems of work are implemented and explained to employees;
6. Any hazardous substances used in relation to works with asbestos are stored, transported, handled and used in accordance with their Material Safety Data Sheets and COSHH Assessments;
7. They take responsibility for completing site generated documentation such as daily RPE inspection records and daily exposure records;
8. All operatives working on site hold the relevant statutory documentation and relevant task specific training certification;
9. Management are informed of all health and safety issues they cannot rectify;
10. All accidents, incidents, ill health, dangerous occurrences and other issues concerning safety raised by anyone at work are recorded and investigated such that effective controls can be implemented to help prevent recurrence;
11. Personal protective equipment is readily available and staff issued with this equipment is aware of its correct use, storage and procedures for obtaining replacements;
12. All available methods are employed to prevent the spread of asbestos fibres;
13. Safe access/egress routes are available and maintained with adequate signage.

## **Asbestos Removal Operatives**

The Health and Safety responsibilities of the Asbestos Removal Operatives are to ensure that they:

1. Understand the company's Asbestos policy, understand their responsibilities and comply with the requirements;
2. Use the correct tools and equipment for the task;
3. Use the personal protective equipment provided;
4. Only use tools which are in good condition;
5. Report all defects in tools, plant, equipment and materials, or any obvious safety or health hazards;
6. Take reasonable care not to endanger themselves or other persons through their actions or omissions at work;
7. Avoid improvisation;
8. Warn new employees of known hazards;
9. Refrain from horseplay and follow all health and safety site rules;
10. Do not misuse or abuse anything provided under a statutory requirement in the interests of health and safety;
11. Co-operate with the company on all aspects of health, safety and welfare;
12. Do not operate any equipment or machinery unless they have been fully trained and instructed in its operation;
13. Report all accidents and incidents so that action can be taken to prevent a recurrence;
14. Inform their line manager of any change to their state of health, either temporary or permanent, which might affect their working ability or their suitability to carry out any particular task or tasks;
15. They carry out daily checks of their RPE, complete a daily check record and issue it to their Supervisor at the end of every week.

## **Training and Competence**

Trinitas Contracts Ltd are committed to ensuring that the highest levels of training and competence are achieved by all of our staff, to this end and having carried out a training needs analysis the following needs have been identified for each person and group with responsibility for implementing any part of this policy.

### **Director**

- ARCA – Licensed Contractors Management Course
- Minimum 10 years experience within the industry

### **Managers**

- Construction Skills SMSTS
- ARCA – Asbestos Supervisors Training Course
- Minimum 10 years experience within the industry

### **Asbestos Supervisor**

- ARCA – Asbestos Supervisors Training Course
- Minimum 5 years experience within the industry
- Task specific training including abrasive wheels, mobile scaffold towers, injection systems, confined spaces, first aid at work.

### **Asbestos Operatives**

- ARCA – Asbestos Operatives Training Course
- Minimum 2 years experience within the industry
- Task specific training including abrasive wheels, mobile scaffold towers, injection systems, confined spaces

### **New Starters**

All new starters will have or be working towards the training relevant to their position, as listed above. All previously attained certification will be verified by contacting the issuing body to ensure that the certificate is valid and if so will be stamped "Verified" signed and dated by the Lloyd Reeves.

Copies of all training certificates will be kept on each employee's personnel file at head office. The date of expiry will be entered on a database in order to enable refresher training to be booked in good time.

All new starters will be assigned to an experienced supervisor for a probation period of 3 months. During the probationary period new starters will be required to demonstrate to their supervisor appropriate levels of competence, the supervisor will report their observations to the Iain Herbert and at the end of the probation a skills gap analysis will be carried out. Any training needs will be addressed before allowing the new starter to assume the role of competent operative or supervisor.

## Health Surveillance and Monitoring

Trinitas Contracts Ltd will ensure that all personnel employed by them to undertake work with asbestos or to enter asbestos enclosures are subject to medical surveillance by a trained and competent medical practitioner every two years. This medical surveillance will be carried out regardless of whether the control limit of 0.1f/cm<sup>3</sup> is likely to be exceeded or not.

It is the responsibility of all undertaking work with asbestos or entering asbestos enclosures to report any cases or symptoms of occupational ill-health to their line manager at the earliest opportunity.

In order to ensure the accurate recording of actual exposure of operatives to asbestos fibres personal monitoring shall be undertaken by a UKAS approved analytical company and to the nationally recognised standard ISO 17025.

The primary purpose of this monitoring is to ensure the effectiveness of control measures in reducing the release of asbestos fibres during works. They will also be used to determine control measures when planning future works.

Records of employee exposure will be kept for 40 years or until the employee reaches 80 years of age.

The frequency of personal monitoring will be dependant upon the type and form of asbestos being worked upon.

Below is proposed frequency for personal monitoring

Product	Typical Asbestos Content	Frequency of Monitoring
Spray Coating	85%	100% (1 operative)
Asbestos Lagging	85%	50% (1 operative)
AIB	16% - 40%	Four times per year
Textiles/Rope	Up to 100%	Dependant on condition
Paper	Up to 100%	Dependant on condition
Asbestos Cement	10% - 15%	Dependant on condition
Floor Tiles	Up to 25%	Dependant on condition
Textured Coatings	3% - 5%	Dependant on condition
PVCs & Plastics	Up to 10%	Dependant on condition

## **Auditing**

In order to ensure that all works are carried out in line with legislation, best practice and Trinitas Contracts Ltd asbestos procedures regular inspections of work places will be carried out, either by the Sales Director or a specialist external contractor.

The findings of these inspections will be recorded on the Asbestos Audit Report form.

It is the intention that each supervisor will be audited at least once every month.

## **Fit Testing**

It is the responsibility of Trinitas Contracts Ltd to ensure that all personnel employed to work with asbestos containing materials will be Fit Tested for full and half face filtering masks. This procedure will be undertaken at regular intervals, at least every two years or whenever there are changes to the operatives face.

## **Vehicles**

All vehicles used by employees engaged in asbestos removal work or used to transport asbestos contaminated waste or products shall be subject to air monitoring.

The rear compartment which incorporates the area from the rear doors to the sealed bulkhead separating the driver and crew, shall be tested not less than monthly and the results of these air tests shall be displayed on the inside of the rear doors.

Following research published by HSE that elevated fibre counts can occur where operatives fail to follow the prescribed decontamination techniques, the drivers cab shall also be subject to regular air monitoring.

All vehicles used to transport operatives engaged in asbestos work or to transport asbestos waste shall be thoroughly cleaned not less than weekly. This cleaning shall include vacuuming all flat surfaces using a "H" type vacuum and wiping all surfaces with tac-rags. The waste generated by this process will be placed into clear sacks and disposed of as contaminated.

## **Action Plan**

In order to ensure that key Organisational, Management and General Targets are met Trinitas Contracts Ltd shall ensure the ongoing development of the remedial action plan, allocate appropriate timescales and detail responsibilities for implementation. All actions are to be regularly reviewed by senior management.

## Action Plan

Ref No.	Description	Action By	When	Status
<b>M</b>	<b>Wall mount fire extinguishers</b>	<b>Iain Herbert</b>	<b>1 week</b>	
<b>G</b>	<b>Ensure that additional compartment is provided in vans for hazardous waste</b>	<b>Iain Herbert</b>	<b>1 month</b>	
<b>H</b>	<b>Attend COSHH assessment training</b>	<b>Iain Herbert</b>	<b>1 month</b>	
<b>H</b>	<b>Carry out review of COSHH assessments and safety data sheets</b>	<b>Iain Herbert</b>	<b>1 month</b>	
<b>F</b>	<b>Arrange manual handling &amp; fire safety awareness training</b>	<b>Iain Herbert</b>	<b>1 month</b>	
<b>S</b>	<b>Carry out regular asbestos site safety evaluations</b>	<b>Iain Herbert</b>	<b>1 month</b>	
<b>G</b>	<b>Carry out regular air monitoring in vans</b>	<b>Iain Herbert</b>	<b>1 month</b>	
<b>F</b>	<b>Attend safety management training</b>	<b>Iain Herbert</b>	<b>3 months</b>	
<b>T</b>	<b>Carry out contractor competence assessments</b>	<b>Iain Herbert</b>	<b>3 months</b>	