



Health and Safety Policy

Airborne Environmental Consultants Ltd
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ISO45001.01

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Airborne Environmental Consultants Ltd

CONTENTS

1. Health and Safety Policy Statement	3
2. Organisation for health and safety	4
3. Arrangements for health and safety	6
4. Monitoring	21

AIRBORNE ENVIRONMENTAL CONSULTANT - HEALTH AND SAFETY POLICY

PART 1. HEALTH AND SAFETY POLICY STATEMENT

It is the policy of Airborne Environmental Consultants Ltd. to ensure, so far as is reasonably practicable, the health and safety of its employees, contracted personnel and members of the public whilst they are at work, and to adhere to the safety procedures and arrangements documented within the health and safety policy.

The Company will observe the Health and Safety at Work etc. Act 1974 and all relevant regulations and codes of practice made under it. The Company will take into account any requirements, recommendations and guidance made by the Health and Safety Executive with regard to health and safety issues and GB legislation.

This commitment to health and safety is a management responsibility equivalent to that of any other management function. It will be the duty of the Company's directors to ensure that policy is upheld at all times and to provide the necessary funds and manpower required, including audit and training of staff.

The Company will conduct its undertaking in such a way as to ensure, so far as it is reasonably practicable, that persons not in its employment who may be affected are not exposed to risks to their health and safety. Where such risks exist, information will be provided, and all reasonable steps will be taken to bring this to the attention of its employees.

AEC's commitment is to manage health and safety matters through organisational and procedural responsibilities as documented in the health and safety policy, by promoting health and safety to our staff & customers, by consulting our staff and customers, and seeking a culture of zero accidents, incidents and near misses.

AEC also commit to continuous improvement as part of our ISO45001 accreditation, and also to:

- Reduce accidents, incidents, and near misses, while ensuring all are reported, with an aim of no lost-time accidents in a year.
- Reduce sickness absence, and target of no occupational illness or ill-health, including mental ill-health.
- Ensure health and safety training and competence is maintained.
- A target of no enforcement activity and claims.

In order to achieve these aims, AEC shall identify and risk-assess hazards, and have arrangements in place to safely manage these, meet or exceed all legal statutory requirements, and provide information, instruction, and training to all staff to carry out their roles competently.

To implement this policy, Airborne Environmental Consultants Ltd. expects full co-operation from all employees, in all locations. The neglect of health and safety requirements will be regarded as a disciplinary matter and may result in instant dismissal.

**ADOPTED BY THE AIRBORNE ENVIRONMENTAL CONSULTANTS LTD EXECUTIVE BOARD
REVIEWED AND REISSUED JANUARY 2024**

**SIGNED
DATE**


9th January 2024

**D EVANS
DIRECTOR RESPONSIBLE FOR HEALTH AND SAFETY**

PART 2. ORGANISATION FOR HEALTH AND SAFETY

To ensure this policy is followed, personnel shall have the organisational and procedural responsibilities designated:

Director Responsible for Health and Safety – Mr D Evans

- Co-ordinate and promote health and safety activities within the company.
- Ensure the sufficiency of financial and other resources to meet the company's safety requirements.
- Support and encourage directors and line managers in achieving the highest standards in accident prevention, avoiding risks to health, and minimising the waste of resources.
- Nominate health and safety managers and advisers as necessary.
- Establish a safety committee with representatives.
- Establish safe systems of work; supervise the preparation, control and updating of the health and safety systems.
- Monitor health and safety performance and ensure that accidents, near misses and dangerous occurrences are properly investigated and action taken to prevent any recurrence, and where appropriate, reported to HSE under RIDDOR.
- Ensure all employees, especially new recruits, receive adequate safety training, and that suitable and adequate safety equipment is available and used.
- Apply the same strict standards of health, safety and welfare to any sub-contractors and others working under the control of the group.
- To manage the company's ISO45001 quality system.

Nominated Health and Safety Manager – carried out by D Evans

- Implement internal health and safety procedures and risk assessments.
- Assist and support director responsible for health and safety in his duties.
- Ensure compliance with all current HSE legislation.
- Carry out accident, incident and near miss investigation.

Health and Safety Representatives

- Ensure the effective implementation of the group safety policy within their area of responsibility.
- By example and communication, encourage good safety practices.
- Act as staff representatives in accordance with Health and Safety (Consultation with Employees) Regulations 1996.

Individual responsibilities

All employees and contracted personnel are required to co-operate in implementing the requirements of all health and safety legislation and related codes of practice, to refrain from doing anything which constitutes a danger to themselves or others, and to point out to their manager or safety representative any situations or practices that may lead to injuries or ill health, as required by section 7 of the Health and Safety at Work etc Act 1974.

The policy requires the full co-operation of all employees who are expected to give all possible assistance aimed at its successful implementation, to take reasonable care for their own safety and that of others. In order to achieve this end, every employee must:

- Comply with any safety instructions and directions issued by the company.
- Take reasonable care for their health and safety and the health and safety of other persons (e.g. other employees, contractors, customers, workmen, members of the public etc.) who may be affected by their acts or omissions at work, and by observing safety rules, which are applicable in compliance with Section 7 of the Health and Safety at Work etc Act 1974.
- Co-operate with the company to ensure that the aims of the health and safety policy statement are achieved, and any duty or requirement imposed on the Company by or under any of the relevant statutory provisions is complied with.
- Report and co-operate in the investigation of all incidents that have led to, or may lead to, injury.
- Use equipment or personal protective and respiratory protective equipment provided in accordance with the training received.
- Report any potential risk or hazard or malfunction of equipment to the appropriate person.

PART 3: ARRANGEMENTS

Arrangements are based on best health and safety practices and also mandatory and statutory provisions in the UK. The purpose of arrangements is to ensure the health and safety of staff and all others affected by the work of AEC. As an occupational hygiene, water hygiene and asbestos consultancy, many arrangements of AEC's core business are bound within the UKAS Quality Manuals, to ISO 17025 and ISO 17020, which should be read in conjunction with this policy, and the LRA procedures. In addition, AEC are accredited to ISO 45001.

3.1 Information, instruction, and training

- All staff undergo general health and safety training as part of their induction process and have annual refresher training in general health and safety, as well as toolbox talks on specific topics.
- All site staff shall be trained in accordance with our UKAS procedures and accreditations, including BOHS P400 or RSPH examinations as dictated by UKAS accreditations, BOHS P900 for water staff and any other applicable qualifications such as BOHS for occupational hygienists.
- All staff shall be given information, instruction and training as required by, and in accordance with, any statutory regulations such as the Control of Asbestos Regulations 2012, COSHH Regulations etc.
- All staff shall be given information, instruction and training as required by and in accordance with, any statutory regulations such as the Control of Asbestos Regulations 2012, COSHH Regulations etc for the specific use of any control measures, including PPE and RPE.
- All staff shall be subject to annual refresher training in both health and safety and also in the core business, under our UKAS procedures and accreditations.
- Where applicable, site staff shall be trained and hold an appropriate CSCS card for health and safety to access construction sites. Once qualified as analysts or surveyors, staff apply for a skilled worker card as asbestos surveyor or analyst, via the trade organisation.
- Training needs for the company and individuals are subject to ongoing monitoring and review.
- All nominated individuals within this policy receive information, instruction, and training on their responsibilities.
- Health and safety is an agenda item on all management meetings and information is reinforced at this forum.
- The company has designated health and safety notice boards with information, policy statement and HSE posters on these i.e., in both Manchester buildings and at Fernwood House (AEC southern office).

3.2 Assessment of risk

In accordance with the Management of Health and Safety at Work Regulations 1999, and any statutory regulations such as the Control of Asbestos Regulations 2012, COSHH Regulations etc. a written risk assessment will be carried out for all work activities. Hazards will be identified, and control measures implemented to eliminate risk, or reduce to an acceptable level and the risk assessments will be provided to operatives. These shall be task or location-based workplace risk assessments.

To ensure that this happens AEC shall:

- Identify all hazards with a potential to cause harm to our employees and others who may be affected by our business.
- Evaluate the probability and severity of potential injury or damage.

- Analyse the options for eliminating, reducing, or controlling the identified risks and then take the appropriate action.
- Ensure any new services or products are risk assessed.
- Keep records in writing, or electronic form, of the significant findings of risk assessments and identify employees who may be especially at risk.
- Provide appropriate health surveillance where there is an identifiable disease or potential adverse health condition related to our work.
- Provide our employees and employees of other employers working on our premises with comprehensive and relevant information on risks, preventative and protective measures, emergency procedures and competent persons.

Site-specific risk assessments shall be produced where required, and AEC's IT data-capture systems require a dynamic risk assessment to be completed prior to the commencement of the site works. It is considered that all significant hazards in AEC's workplace, or work activities under AEC's control have been suitably risk-assessed, and that any residual risks are adequately controlled.

Where we identify a risk of serious or imminent danger, AEC shall:

- Establish appropriate procedures for controlling exposure to this specific risk, including the stopping and resumption of work.
- Nominate sufficient competent persons to implement the procedure for evacuation from the premises and restrict access to the danger area for all who have not received adequate instruction.

Risk assessments will also be reviewed should there be:

- Any changes in health and safety legislation affecting the works.
- Any changes to working practices or environmental conditions that could affect employee safety
- An incident or near miss where risk control was compromised.
- An indication that the assessment is no longer valid.
- Periodic (typically annual) review as required by AEC's accreditations.

Workplace risk assessments are available to all staff at g:\AEC common\AEC Health & Safety\Workplace risk assessments.

3.3 Incident reporting

It is the policy of the company to record all incidents i.e., accidents and near misses, no matter how small, and investigate the cause of all incidents, with the aim of eliminating and reducing accidents.

- All accidents are reported and entered into the accident book, which is held at reception at both the Manchester and southern offices.
- Where required, a site accident book is to be completed, if the accident occurs on site and site procedures require reporting, as well as the AEC book (or a copy of the site book obtained).
- The safety manager is responsible for reporting any reportable accidents to HSE under RIDDOR 2013, by;
 - Completing form F2508IE and sending to HSE.
 - Should the accident be a major injury or fatality, this will be reported to HSE immediately by telephone on 0845 300 9923.
 - Carrying out an investigation into the cause of the incident.
- In addition to accidents, dangerous occurrences shall also be reported, by the safety manager, under RIDDOR 2013, by;
 - Completing form F2508DOE and sending to HSE.

- Carrying out an investigation into the cause of the dangerous occurrence.

The health and safety manager will review all reported incidents/accidents which occur, and investigate certain incidents further, i.e., those which are serious, or could have led to serious harm, and those which are frequent. The main purpose of the investigation is to prevent a recurrence of the incident occurring.

The health and safety manager, having made an initial investigation of the accident/incident, shall, where appropriate, update any risk assessment and procedures, and inform relevant staff of any changes.

The health and safety manager shall keep incident statistics and report monthly to the board of directors.

3.4 Notices / information / communication

The health and safety manager is responsible for ensuring that the following notices are prominently displayed in the office;

- HSE health safety & law poster, with reporting arrangements.
- AEC health and safety policy statement.
- AEC health and safety representatives.
- A copy of employer's liability insurance.
- Minutes of most recent health and safety meeting.
- Any other current pertinent health and safety information

This information is also available in the AEC Health, Safety and Environment folder on AEC Common and the intranet system.

3.5 Fire safety

AEC are legally obliged to safeguard our employees against exposure to the hazards associated with fire.

AEC have put in place the following arrangements for the assessment of risks from fire and appropriate control measures to minimise the risks identified. These measures will include the following arrangements, procedures, and controls:

- Inspection of the structure(s) of the premises for fire safety annually by a competent person.
- Fire detection equipment to be installed and inspected regularly.
- Fire alarms will be regularly tested. This shall be carried out weekly.
- Emergency lighting will be provided and tested as appropriate.
- Fire extinguishers will be placed at clearly labelled fire points and will be tested annually.
- Electrical equipment shall be subjected to period portable appliance testing (PAT). This shall be every 2½ years or sooner for site equipment.
- Emergency exit routes and signs to be kept clear at all times.
- Fire marshals are trained in the use of extinguishers (to facilitate escape), procedures for fire drills, and evacuation.
- Records of training, induction, drills, alarm tests, fire certification to be kept on the premises and up to date in the fire control logbook located with the site maintenance manager.
- A fire drill shall be carried out at least bi-annually, both in Manchester and Essex. Following each drill, a fire meeting shall be held with fire risk assessor, fire marshals, and health and safety staff to carry out any improvements or to close-out any actions.

3.6 Supervision and monitoring of visitors.

- Supervision and monitoring of visitors, including contractors, will be carried out by reporting to, and signing in at, reception, and reporting to an AEC contact, who will inform them of any specific risks e.g., induction on training courses, or supervise for the duration of the visit.
- Precautions in respect of disabled people will be implemented. These arrangements will be reviewed at least annually and on any significant change in the business or the premises. Improvements and alterations may be carried out, following advice from the fire prevention officer, our insurers, or our safety manager if necessary.
- Employees are reminded that they have a legal obligation under the Management of Health and Safety at Work Regulations 1999 to inform their manager of situations where they see serious and imminent danger to health and safety, or any matters where they see a shortcoming in our arrangements for health and safety protection.

3.7 First aid

The Health and Safety (First Aid) Regulations 1981 outline the company's responsibilities to staff. As an organisation of approximately 120 employees, AEC have carried out a first aid needs assessment for each office. At the Manchester head office AEC have one qualified first aider, who is permanently office-based. In addition to the first-aider, AEC have five emergency first aid trained persons, at least one on the ground floor and one on the first floor in both 23 and 27 Wheelforge Way buildings, and also one in the southern office. Both offices have a fully stocked first aid kit, which is checked monthly by the first aider. In addition to this, AEC have three trained mental health first aiders, two in Manchester and one at the southern office.

As many of AEC's staff are peripatetic workers, they are issued with personal first aid kits for cars and all carry mobile phones to raise assistance or emergency services. All asbestos removal jobs must have a first aider at the site (by regulation and licensing) and this is utilised by analysts. All site staff must follow site inductions and be aware of first aid points, where present.

In Fernwood House, Essex, there are typically between one and five staff in the office at any one time. Two office-based staff are trained to emergency first aid level.

Training needs for office are reviewed annually.

3.8 Occupational Ill health

The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR) require us to report certain diseases to our enforcing authority (HSE). All staff have been provided with information on all occupational diseases associated with asbestos and Legionella. It is not believed that AEC staff shall be subject to other occupational diseases.

Any employee who notices any of the symptoms of or is diagnosed by a doctor as having any relevant occupational disease must report this to their line manager and / or HR department as soon as possible.

AEC shall take all reasonably practicable measures to prevent our employees from contracting any occupational disease. However, if an occupational disease is contracted, wherever possible AEC will take steps to protect the employee against further exposure while keeping them in their normal job. If this is not possible, we will try and offer the employee suitable alternative work.

In some cases, we may have to suspend employees to protect their health. This will only be done after all other alternatives have been considered but are not reasonably practicable.

Not reporting an occupational disease associated with your work activity is a disciplinary offence.

3.9 Peripatetic Workers

The Health and Safety at Work, etc. Act 1974, the Management of Health and Safety at Work Regulations 1999, and the Workplace (Health, Safety and Welfare) Regulations 1992 apply to our employees who visit other premises in the course of their work (peripatetic workers). As a consultancy, AEC recognise that this is our core business, and have safe working procedures for all asbestos sampling, surveying and air testing works, as well as project management, Legionella assessments, training, and occupational hygiene monitoring.

AEC recognise that this work is carried out in places that are not under our direct control. AEC will provide additional measures, such as specific risk assessment and information, instruction, and training, to ensure the safety of AEC staff on the premises of others. It is AEC's core business to be aware of specific risk from asbestos and all staff are trained and supervised in risks.

Where any of our employees are on other premises for anything other than short periods, we will ensure that those in control of the premises are aware of the proposed activities of our employees, by means of a risk assessment.

AEC shall obtain risk information from the person in control of visited premises, covering any of their activities that may affect our employees, in addition to the risk assessments required for our work.

Arrangements and procedures for peripatetic workers

- All peripatetic staff are trained in the specific risks for their task e.g., asbestos surveying, sampling, or air testing etc.
- None of our staff shall be expected to work on the premises of others without being advised of the hazards they may face and how to deal with them.
- AEC require all clients to provide our employees with information on site-specific risks and induction on any emergency procedures.
- Clients will be asked to make available their first-aid arrangements, sanitary and washing facilities, and their facilities for rest, eating meals and, where available, their catering arrangements.
- When clients do not wish to make any of their welfare facilities available, our employees will be given sufficient time to locate local alternatives for breaks and sanitary facilities. If necessary, AEC shall provide temporary welfare facilities, such as WCs and cabins.
- All peripatetic workers will be provided with a travelling first-aid box, whether they are working on a client's premises where first aid is available or not.
- Workers on client's premises must conform to all their arrangements for fire, security and liaison, such as signing the visitors' book, observing no smoking areas and reporting to named managers before starting or leaving work or moving to a different area.
- Workers on client's premises will be required to liaise with a previously identified contact at management level.

3.10 The Construction (Design and Management) Regulations 2015

The CDM Regulations apply to all construction works. Many of AEC's core services are not considered to be part of CDM i.e. surveying. However, AEC shall carry out certain roles within the CDM Regulations. AEC shall NOT act as a principal contractor under the CDM Regulations 2015.

When acting as a contractor under the CDM Regulations 2015 AEC will, on all projects;

- Ensure we are competent to carry out this function. AEC shall typically act as project managers, surveyors or analysts on major asbestos removal projects, or as part of enabling & risk assessment works (surveys).
- Ensure we control & manage our own work safely and within our internal & UKAS procedures. AEC shall ensure risks associated with this work are addressed, method statements written and both made available to all parties via the principal contractor, principal designer or the client.
- Ensure clients, principal contractor & principal designer are aware of current asbestos regulations, including 14 day notification to the HSE in order that adequate resource (time as well as financial).
- Ensure risks are addressed during the design.
- Ensure the risks are raised to all contractors and the client prior to the commencement of the works.
- Attend co-ordination meetings to cover risks.
- Ensure adequate welfare facilities are present.

On notifiable (F10) projects AEC will also;

- Ensure that a principal designer has been appointed.
- Do not start detailed design work until a principal designer has been appointed. The principal designer may introduce further risks unknown to AEC designer.
- Co-operate with all parties (client, principal designer, PC, other contractors) to ensure that all are aware & competent to carry out their duties, plus assist in compiling the health and safety file.
- Confirm welfare and security are provided on the site.
- Advise the client, if required, on notification.

As a designer, AEC are NOT responsible for;

- Any unforeseeable hazards
- Design for future use that cannot be anticipated. As a designer, AEC act on asbestos abatement projects, and are not involved in design of new build.
- Specifying construction, demolition or abatement methods. Competent contractors i.e. licensed asbestos removal contractors, shall be aware of legal requirements and best practice.
- Managing health and safety during construction works.

3.11 The Control of Substances Hazardous to Health Regulations (as amended) 2002 - COSHH

The Control of Substances Hazardous to Health Regulations 2002 (as amended) applies to our working environment, and specifically the laboratory and water treatment part of the business. AEC are aware that some substances have the potential to cause ill health and AEC have identified the substances our employees use or are exposed to in the course of their work. Wherever possible, AEC shall discontinue the use of harmful substances (so long as this can be done without serious detriment to our business). However, AEC's business follows specific HSE methods, requiring the use of certain substances with a potential to cause harm.

Substances that must be used have been assessed and control measures introduced to prevent risk to our employees or others affected by our business operations. Where reasonably practicable, these measures will not involve personal protective equipment (PPE).

AEC assess the use of all new substances introduced into the workplace. At least once a year AEC use this policy as a prompt to create an annual safety checklist to review our control measures, to ensure that the management controls are still appropriate and effective and is part of the annual safety meeting agenda.

AEC do not require staff to wear PPE as part of any COSHH assessment, but this may change if project conditions require its use.

Information, instruction, and training will be provided for all employees who may be exposed to hazardous substances. The necessary information and training will also be provided for any non-employees working on site who may be exposed to hazardous substances.

Arrangements and procedures for COSHH

- **Substance inventory**

A complete inventory covering the hazardous substances used and stored by AEC has been prepared and is available to all staff. The inventory listing is regularly and at least annually reviewed and revised as necessary. The headings required by the Classification Labelling and Packaging Regulations 2009 will be used for our record purposes. Employees will be reminded that only hazardous substances listed on the substance inventory may be used. No hazardous substances may be introduced to the workplace without management authorisation in writing.

- **Risk assessments and data**

Specific COSHH risk assessments as required by the Control of Substances Hazardous to Health Regulations have been carried out for all hazardous substances and processes in which they are used. Material health and safety data (MSDS) has been obtained from the suppliers of all hazardous substances, and will be kept readily available for inspection

- **Information, instruction and training**

Employees are given information, instruction and training in the activities they undertake involving hazardous substances. This is provided during specific training for sample analysis, which covers all safety aspects. The information given to employees will include the results of the risk assessment, whether or not there are any significant risks. The information will not include the hazard data sheet, because this requires interpretation by a suitably competent person. The use of hazardous substances is restricted to trained/experienced-authorised persons who are familiar with the safe use of the substances; hazards associated with processes and the safety precautions to be observed. All trainees are supervised in the use of any hazardous substances.

- Controls for exposure to hazardous substances

Wherever reasonably practicable, management of the risk will be used in the following order:

- Elimination: cease use of substance.
- Substitution: if possible, use something less hazardous.
- Controls: engineering controls are used, as substances hazardous to health are used within laboratory dust boxes, which are fitted with local exhaust ventilation (LEV).
- The dust box is examined and maintained every 6 months as a Control Measure under Regulation 13 of the Control of Asbestos Regulations 2012 (rather than 14-monthly under COSHH). In addition, there are monthly face-velocity tests on all dust boxes to ensure that a velocity of 0.5m/s is maintained, plus daily qualitative 'tissue tests' are carried out.

The Quality Manager keeps records of testing and maintenance and keeps these records for our UKAS quality accreditations.

Where substances are used on site, specifically acetone, then these are used as per procedures outlined in AEC's accreditation to ISO 17025. This involves small quantities, in ventilated areas for very limited times.

3.12 Personal protective equipment PPE

The Personal Protective Equipment at Work Regulations 1992 (as amended) applies to AEC's work activities. Personal protective equipment (PPE) must be used for asbestos sampling, surveys and air monitoring, as it is not reasonably practicable to modify the activity, the process, or the method of work to prevent the risk.

Specific assessments to comply with the Personal Protective Equipment at Work Regulations 1992 (as amended) are carried out under AEC's UKAS accreditations and in line with the Control of Asbestos Regulations 2012.

For all activities requiring the use of PPE, a record will be made of the protective equipment, the operations and the personnel involved. The quality manager keeps a list of activities that are identified by risk assessments as needing PPE, together with the records of its maintenance, cleaning, disinfection, testing or repair.

All PPE required by the risk assessment for the specified activity is provided without charge, as required by law.

All activities requiring the use of PPE will be monitored and any item found unsuitable or damaged will be replaced as necessary.

- Only PPE that complies with the relevant British or European standard will be purchased. Where appropriate, only 'CE' or UKCA marked PPE (and replacement components of PPE) will be purchased. PPE will be selected which does not interfere with other items of equipment.
 - Coveralls must be type 5/6 to protect from asbestos fibre.
 - Respirators must have FFP3 filters to protect from asbestos fibres.
 - Individuals supplied with RPE must undergo face-fit testing for each piece of RPE supplied.
- PPE will be maintained and replaced as necessary to ensure its effectiveness, including cleaning, disinfecting, testing and repair. Employees must report loss or obvious defects in PPE to management as soon as practicable and safe to do so.
- All RPE is subject to monthly inspection and maintenance.
- All RPE is to be allocated a storage box separate from that provided for personal outdoor clothing under our welfare arrangements.

- Where PPE is subject to statutory inspection and testing, the quality manager will keep records.
- Training can significantly reduce the risk of injury or ill health and will be provided for all operations requiring the use of PPE.
- In view of the importance of PPE as the 'last resort' against hazards, employees are required by the business and the law to use PPE for the activities specified in our risk assessments. Repeated failure to do so may be considered as gross misconduct.
- Employees who use PPE that has obvious defects and fail to report these to their manager as soon as practicable and safe to do so, may be subject to our disciplinary procedures.

3.13 The indoor environment

The Workplace (Health, Safety and Welfare) Regulations 1992 govern the health and safety of our indoor working environment. Where reasonable, AEC will adapt the premises and facilities to those employees with disabilities.

It is our policy to exceed the minimum health and safety requirements of the law and to provide a working environment that is both comfortable and that maximises the effectiveness of employees. In order to achieve this, AEC have put in place arrangements for the assessment of risks from the working environment and provide, maintain and monitor appropriate control measures to minimise the risks identified.

Responsibility for implementing this policy lies with Director Responsible for Health and Safety who will delegate functions, as identified in our organisational responsibilities.

Employees are reminded that they have a legal obligation under regulation 14(2) of the Management of Health and Safety at Work Regulations 1999 to inform their manager of situations where they see serious imminent danger to health and safety, or any matters where they see a shortcoming in our arrangements for managing health and safety.

3.14 Manual handling

The Manual Handling Operations Regulations 1992 apply to our work activities, both office-based and on site. AEC consider that preventing this type of injury in our business will improve morale and contribute significantly to our profitability by reducing potential losses.

In consideration of their special needs, we will take additional measures to secure the safety of young employees (under eighteen years old) and pregnant or nursing mothers, including modifying our manual handling risk assessments.

Manual handling operations are assessed for all activities for any loads other than those, which are clearly not significant. Manual handling operations in areas or under conditions that may alter the risk will be assessed. It is considered that manual handling operations at AEC will be minimal and infrequent, and loads above 25kgs are unlikely to be lifted.

Training in lifting techniques can significantly reduce the risk of injury and will be provided for staff involved in all operations identified as having a significant risk. All manual handling operations identified, as having a significant risk will have the results of the assessment recorded, whether or not the assessment can be easily repeated, in order to demonstrate that it has been carried out.

Arrangements and procedures for manual handling operations

Work areas will be kept in good condition, free from slipping and tripping hazards with clear access to the load. Wherever straightforward, loads will be split into smaller loads to reduce the likelihood of injury. Where lifting teams are working, a team leader will be nominated to co-ordinate the effort. For the lifting of heavy or awkward shaped materials, equipment or loads, mechanical assistance (including fork lift trucks, sack trolleys, vacuum lifts, hoists, roller conveyors and pallet trucks) will be provided wherever reasonably practicable.

The distance loads have to be carried must be reduced to the minimum, including taking the work activity, e.g., unpacking, to the load if necessary. Where distances are excessive, manual handling must be used and the activity cannot be taken to the load, e.g., heavy materials moved between machining operations, resting areas will be designated to allow the handlers to pause and rest. Wherever reasonably practicable, manual-handling tasks will be automated or mechanised. Loads of any size large enough to obscure vision, including empty boxes, must not be carried manually. They will be placed on trolleys or pallet trucks, as necessary, and pulled so that the operator has a clear view of the route. Loads must not be stacked above chest level by hand. A suitable, stable platform must be used to stand on. Loads of more than half the weight of the person lifting it may cause the individual to lose balance and will only be lifted with assistance. Employees who are engaged in manual handling operations will be trained in the correct techniques, including team lifting and kinetic handling, and any additional techniques for special loads. Employees who are not employed for manual handling operations will not be allowed to carry them out without suitable and sufficient training.

3.15 Rehabilitation

Vocational rehabilitation ('rehabilitation') aims to ensure the recovery of employees from injury or illness, and their return to suitable employment.

Rehabilitation of employees is not, in itself, a legal requirement (it is not referred to in health and safety legislation). Instead, it is generally regarded as best management practice.

The practical benefits of vocational rehabilitation include:

- Earlier return to work.
- Reduced disability payments.
- Regained productivity.

Rehabilitation is often more cost-effective than paying long-term disability costs or hiring, training or transferring other workers to fill the post.

We aim to provide our employees with access to rehabilitative treatment in a number of ways, including:

- Provision of private medical insurance.
- Taking out permanent health insurance with providers who offer rehabilitation services.
- Using internal or external occupational health and counselling services and providing access to surgery or specialist advice.

Practical actions include arranging for return to different or altered work, changing hours or making adaptations to the workplace, and retraining and redeployment. Early actions after injury increase the likelihood of success. The scope for rehabilitation varies due to factors such as:

- Organisational commitment and culture.
- Organisational awareness, resources and expertise.
- Work tasks and processes.
- Attitudes to workers and co-workers.
- The nature of worker representation.

Sickness absence policy is a possible framework for rehabilitation, but it is not always the best arrangement. Practical steps that we can take to ensure a successful approach to rehabilitation include:

- A clear policy on rehabilitating workers, with sensible links to other company policies.
- Considering the interaction between sickness absence management and the disciplinary processes.
- Consulting with the workforce to develop a policy on rehabilitation and being open about the implementation of the policy.

- Responding actively to sickness absence by staying in touch with employees who are off sick and referring them for early medical checks.
- Keeping an open mind about whether that absence may be work-related (and investigating possible causes).
- Providing access to good occupational health facilities.

3.16 Alcohol & drugs

AEC is committed to providing a safe & healthy workplace of its employees, visitors, and customers, and recognises the inherent risks associated with the misuse of alcohol & drugs on site and within the office with regards to health and safety, but also to performance. AEC acknowledges the importance of identifying any alcohol and drug use and working with individuals to eliminate this. AEC will:

- Not tolerate the use or possession of any banned substances (drugs), or the misuse of other substances such as solvents, on site or work business during working hours, including lunchtimes.
- Not tolerate drinking of alcohol during working hours, including at lunchtimes. On special occasions or holidays, such as Christmas, management may give permission to drink alcohol at lunchtimes, on the understanding that individuals will not return to site work or drive afterwards.
- Expect staff members taking prescription drugs to inform the company of the reasons why, and any side or after effects, which may affect the conduct or health and safety of the individual or others e.g. drowsiness to prevent driving.
- Look for any factors that may indicate drug use at work, during our risk assessments, and site audits.
- Prevent any employees found to be suffering from the effects of drugs or alcohol from working and send these individuals home. In instances such as these, AEC will carry out a return-to-work interview to ascertain the reasons for the occurrence.
- Where appropriate, offer counselling to individuals who are deemed to have problems with drugs and alcohol, and offer support & guidance.
- Where counselling is deemed inappropriate, or unnecessary, carry out disciplinary procedures on individuals who breach the drug and alcohol policy.
- Carry out drug testing if the company suspects drug misuse by employees, and as part of the probationary period for new employees.

Directors will offer support to a member of staff who is experiencing problems with drugs or alcohol outside work and will seek external advice where appropriate.

3.17 Occupational stress

Stress is the adverse reaction people have to excessive pressure or other types of demand placed on them. There is an important distinction between pressure, which can have positive results if managed correctly, and stress, which is always negative and can be detrimental to health. AEC are committed to protecting the health, safety and welfare of our employees, and we acknowledge the importance of identifying and reducing any factors that may cause workplace stress. This policy applies to everyone in the company. Managers are responsible for implementation and the organisation is responsible for providing the necessary resources.

AEC will:

- Look for any factors that may cause stress at work, during our risk assessments.
- Consult with employees on our proposed actions to deal with workplace stress.
- Provide training for all managers and supervisory staff in good management practice and provide the resources to enable managers to implement this policy.
- Ensure good communication between management, safety representatives and staff, particularly where there are significant changes in methods of working.
- Ensure staff is sufficiently trained to discharge their duties.
- Not tolerate bullying or harassment from any member of staff.
- Provide support with mental health first aiders.

Managers will offer support to a member of staff who is experiencing stress outside work, e.g. bereavement or separation, and managers will be trained in implementing stress risk assessments and are supported by Mentor (external employment law advisory service). AEC will support individuals who have been absent due to stress and advise them and their management on a planned return to work.

AEC will monitor and review the effectiveness of our measures to reduce stress and collate sickness absence and other statistics.

Employees should:

- Raise issues of concern with health and safety representatives or their line manager.
- Accept opportunities for counselling when recommended.

3.18 Pregnant workers

The Management of Health and Safety at Work Regulations 1999 and the Maternity (Compulsory Leave) Regulations 1994 apply to any of our employees who are pregnant, breast feeding or who have given birth within the last six months. The Workplace (Health, Safety and Welfare) Regulations 1992 require us to provide rest facilities for new or expectant mothers.

Our risk assessments cover new and expectant mothers. Female workers will be informed of any additional risks they may face if they become pregnant or are breast-feeding, where applicable.

AEC recognise the extra vulnerability of pregnant and nursing mothers and additional risk assessments will be made when a woman notifies her manager that she is pregnant. Additional measures will be applied for six months after the birth.

AEC are only required by law to take extra precautions for pregnant or nursing mothers if we are notified of their condition. If pregnant employees do not provide confirmation from their medical practitioner, we may request medical confirmation.

Our display screen equipment workstations, e.g., computer terminals, are properly assessed and controlled and there is no additional risk to pregnant women or nursing mothers.

Additional risks to pregnant women and nursing mothers will be minimised, but in some cases, this will not be reasonably practicable, including:

- Extended shiftwork.
- Strenuous manual handling.
- Sitting/standing for extended periods.
- Work in extremes of temperature.
- Work in areas or on surfaces with a higher risk of slips, trips or falls.
- Activities, which prevent the employee leaving the work area for rest or to use toilet facilities.
- Any case where the medical practitioner of a pregnant woman or nursing mother states that her normal work could affect her health and safety.

As required by law, if additional risks to pregnant women and nursing mothers cannot reasonably be reduced, AEC will find alternative work (with no loss of terms or conditions), or authorise paid leave if alternative work is not available.

3.19 Young persons at work

The Management of Health and Safety at Work Regulations 1999 require a suitable and sufficient risk assessment for all work involving young persons (16 to 18 years old) prior to their employment and will communicate the result of this to them on their commencement of work.

No persons under the age of 18 will be employed by AEC to carry out any site or laboratory works with asbestos in accordance with The Management of Health and Safety at Work Regulations 1999.

Risk assessments for work involving young persons will be modified with the following considerations relating to their:

- Physical and psychological capacity to carry out the work effectively.
- Potential exposure to toxic or harmful substances or agents (including radiation & asbestos).
- Inexperience in the recognition of potentially hazardous situations, or lack of training.
- Potential exposure to extremes of heat or cold, noise or vibration.
- Where young persons or school age children (on work or other experience schemes) may be exposed to risk, their parent or guardian will be advised of the identified risks.

3.20 Smoking at work

Under the Health Act of 2006, The Smoke-free (Premises and enforcement) Regulations 2007 require that all places of work be smoke-free.

AEC recognise that smokers have a right to smoke and that non-smokers have a right not to breathe tobacco smoke. We are legally required by the Workplace (Health, Safety and Welfare) Regulations 1992 as well as The Smoke-free (Premises and enforcement) Regulations 2007 to protect non-smokers from the effects of tobacco smoke in rest areas. We will make provision for this by:

- Smoking is not permitted anywhere within the building.
- Smoking is not permitted in company vehicles where the driver is accompanied by any number of passengers. Under The Smoke-free (Exemptions and vehicles) Regulations 2007, passengers (or driver) are not permitted to allow others to smoke in vehicles.

The areas where smoking is permitted are:

- To the rear of the building, at least 5m from the entrance to the building.

3.21 Work equipment

The Provision and Use of Work Equipment Regulations 1998 apply to the functioning and safety of our work equipment. Where reasonable, we will adapt the work equipment, or its use, to those employees with disabilities, as long as this creates no additional hazards.

In order to minimise the risk of injury from work equipment, we will put in place arrangements for the assessment of risks and then create appropriate control measures to minimise the risks identified. These measures will include the following arrangements and procedures:

- A full assessment of all new or second-hand equipment purchased.
- All equipment purchased will comply with any relevant product safety standards.
- All hired or rented equipment will be required to comply with the Regulations and will include the provision of comprehensible information on safe use.
- Inspection of the equipment and testing where necessary.
- A log for all equipment that could give rise to serious injury.
- Adequate and identifiable means of isolation, where appropriate.
- The provision of suitable and effective safety devices.
- The provision of suitable and effective controls.

- Suitable and readily comprehensible signs and warnings.
- Suitable general, task and emergency lighting.
- Suitable training.

These arrangements will be reviewed at least annually and on any significant change in the type, nature or use of equipment. If the workforce has employees whose English is poor, the information will be provided in appropriate languages, either written and/or spoken.

Employees are reminded that they have a legal obligation under the Management of Health and Safety at Work Regulations 1999 to inform their manager of situations where they see serious and imminent danger to health and safety, or any matters where they see a shortcoming in our arrangements for health and safety protection.

3.22 Occupational road safety

The Health and Safety at Work etc. Act 1974 and the Management of Health and Safety at Work Regulations 1999 require us to assess any risks to employees and others, including the public, from work activities. Significant risks should be reduced as far as reasonably practicable. This legal requirement applies to occupational road use.

It is our policy to ensure the health and safety of our employees while they are in vehicles on company business.

We will ensure that:

- Significant risks are identified and measures are introduced to eliminate or reduce them, as far as reasonably practicable.
- Company vehicles will be safe to drive and properly maintained.
- Staff who use the car allowance scheme must use a car no older than 5 years old and ensure maintenance / MoT certification of their vehicles. Vehicles will be audited to ensure this takes place.
- The duration and timing of drivers' schedules does not lead to undue fatigue. Employees may contact their department manager if they have concerns about the amount or nature of workplace driving.
- Employees must also report any driving bans or endorsements on their driving licence for offences committed under the Road Traffic Act.
- Driving a vehicle on company business while under the influence of alcohol or non-prescribed drugs is forbidden and shall be classed as gross misconduct. Should this happen, AEC will initiate disciplinary action against the individual(s) concerned, and may report the employee to the police, depending on the circumstances.
- Staff should not drive whilst taking a course of medicine that might impair their judgement.
- Mobile phones or similar equipment. The use of mobile phones and similar equipment (whether listening, speaking or 'texting') while driving is an offence, and is forbidden by the organisation. Our prohibition on use while driving includes earpieces but permits 'hands-free' operation using 'Bluetooth' technology. Mobile phones should only be used when the driver has safely stopped or can be operated by steering column controls or be voice-activated. Any staff encouraging the use of mobile phones while driving may be subject to disciplinary action.
- Drivers made aware of offences under the Road Safety Act i.e. using telephone, eating, drinking etc while driving.

Requirements on employees

To ensure proper standards of competence, AEC require all employees to make a valid and appropriate driving licence available for inspection as soon as reasonably possible, on request. All our employees are expected to be aware of, and comply with, general road safety law, and to take reasonable care of themselves, passengers and the public while driving. Although the company is fully responsible for the safety of its own vehicles, employees should advise their department manager if they have any concerns about the safety of a company vehicle.

Use of own vehicle

Employees who use their own vehicle for work related to this company should be confident about the vehicle's general condition. If unsure, they should seek competent advice. If required by law, the vehicle should have a current MoT certificate, and be suitably insured for business use. Our personnel/accounts section can provide help on insurance queries.

We will monitor the effectiveness of this policy and investigate any significant road incidents, as part of continual improvement in safety performance. The policy will be reviewed annually. Constructive suggestions from staff are welcome, and we will consult employees on any proposed revisions. The policy will be properly communicated throughout the organisation.

3.23 HIV and Other Blood-Borne Diseases

AEC recognise that some of our employees may be concerned about HIV and other blood-borne diseases, such as hepatitis B or C, whilst working on site, carrying out asbestos surveys.

AEC have carried out risk assessments for potential exposure to blood-borne diseases and implement any control measures necessary to protect our employees.

On site there is a low risk, and all staff have been instructed to assess disused buildings or sites for evidence of drug users occupying the area. If evidence of drug use is found, staff must only access where physically safe to do so, and not access any voids or places where sharps may have been discarded. If sharps are identified then the client must be informed, and necessary environmental department of the local authority contacted (if applicable).

Within the office environment, the risk is very low, however any staff carrying out first aid (emergency first aider or first aider) shall comply with the following;

- Injuries must only be treated by a qualified first aider / emergency first aider.
- There is a significant risk to first aiders who treat injuries without using appropriate equipment. First-aiders / emergency first aider are trained in how to protect themselves against blood-borne diseases and will wear disposable protective gloves and other items as necessary.
- Employees suffering from HIV are to be encouraged to report their condition to the employer. Employees found to be suffering from HIV infection or AIDS will not be treated differently from other employees.
- The fact that an employee is suffering from HIV infection or AIDS will not be communicated to other employees without the sufferer's consent.

3.24 Temporary workers

The Health and Safety at Work, etc. Act 1974 and the Management of Health and Safety at Work Regulations 1999 apply to the health and safety of temporary workers employed by our business. Except where the temporary worker is retained for short periods (e.g. one day or less), they will be given comprehensible information on the risks to their health and safety, including an induction covering the hazards of our business, emergency procedures and the management controls for those risks. Temporary employees are usually restricted to administrative staff based in the AEC office, though it is possible temporary employees will be exposed to the complete range of risks to which other employees are exposed. They will also be unfamiliar with many of the procedures and will need extra supervision for a period after their induction. Where the temporary worker is

retained only for short periods, they will be given information on emergency procedures, and will be continually supervised.

Arrangements and procedures for temporary workers

Where applicable, agencies of temporary staff will be required to provide evidence that they have a safety policy as a matter of contract between our business and the agency. The policy must include a statement that their workers will comply with our safety procedures whilst on our site. Agencies of temporary staff will also be required to provide evidence of employers' liability insurance.

AEC will provide the agency or staff employed temporarily but individually with details of risks from our activities to the health and safety of personnel supplied by them.

All agency or other temporary workers will be assigned to the supervision of a management member of the permanent staff.

Where personal protective equipment (PPE) is required and agreed with the agency or individual, it will be provided at no less a standard than for permanent employees.

Where there is no agreement, the agency will be required to provide their staff with their own PPE.

This will apply, for example, to staff using display screen equipment bringing their own glasses if they need visual aids, or maintenance operatives bringing their own safety boots if they are working on site.

AEC will provide extra supervision for all work experience employees.

AEC will carry out extra risk assessments for all work experience employees who are under the age of eighteen. AEC shall not employ any staff below the age of eighteen to work in any capacity with asbestos, whether in the laboratory or on-site surveying or air sampling.

3.24 Fatigue and working hours

AEC will follow the UK Government maximum weekly working hours i.e. 48 hours per week averaged over a 17 week period (formerly the Working Time Directive).

AEC staff can opt out of this, though no members of staff are believed to have ever exceeded this amount of time, due to rotas and annual leave applied at AEC.

At AEC there are no fixed shift patterns, such as nights, 12 hours day / nights, but weekend and night working are regularly carried out, as well as work away from home, including overnight stays.

Working on others' premises is covered in the peripatetic workers section (3.10), and office-based staff are not subject to weekend or night working.

Arrangements and procedures for fatigue (shift and weekend working)

- All peripatetic (site) staff are trained in the specific risks for their task e.g. asbestos surveying, sampling or air testing etc.
- Driving hours are restricted, and hotels are provided for staff if they work away for a full day i.e. 7½ hours) and have to travel more than 3 hours.
- A weekend rota is in place whereas staff are asked to work only one weekend in four. Staff can volunteer for more weekend work if they like, within the working guidelines over a 17-week period but are not required to do so.
- Staff are placed on a work away from home rota once per month. This is expected to be a maximum of one week per month to ensure work / life balance for families. However, it may be necessary to work away from home for longer, or staff may volunteer for secondments to sites away from home. This will be normal working hours.
- Staff shall work a maximum of 12 hours in any 24-hour period.
- A 12-hour break (which includes a commute) must be scheduled between jobs, or changeover between night and day work.

- Night working shall include a rest day the following day, and any late working shall include a break of 12 hours (as above) to ensure rest.

3.25 Mental health at work

AEC are committed to ensuring the mental wellbeing of staff and reducing the potential for work-related mental illness. AEC now have three trained mental health first aiders in place.

Arrangements and procedures for mental well-being at work)

- All staff have mental health first aiders and a direct line manager who they report to and can approach, along with a dedicated HR department. This is supported by the board directors. Safety representatives are also available to staff. Once mental health first aiders are trained, they will become the first point of contact for staff with mental health concerns.
- AEC offer both private medical health care and a counselling service. This is independent and confidential.
- Posters are displayed in common areas and on the company intranet on mental health support, referencing internal (HR, line managers) as well as other external organisations such as Anxiety UK, Calm, Mind, Samaritans etc.
- If staff are sick, they report to HR (or line manager). If they cite mental health issues, they are referred to these charities and encouraged to get support from the mental health provider.

PART 4: MONITORING

4.1 Incident investigations

As described in 3.3, all accidents, incidents and near misses will be investigated, and where applicable root causes identified in order to ensure improvements are made. A monthly accident report is provided to board directors by the health and safety manager.

4.2 Site audits

As part of AEC's other accreditations i.e. UKAS and LCA, site audits are carried out on all staff. As part of the audit process, health and safety is considered, including site-specific risk assessments, inductions and any other hazards identified at the time of the work, as well as conduct of staff, such as use of PPE, RPE and equipment.

4.3 System audits

The health and safety management system, ISO 45001 are subject to annual review. This includes workplace risk assessments, COSHH risk assessments, and policies.

The ISO 45001 is subject to annual external audit by QMS.