



Audit Policy

Shield Services Group

Experts in Providing
Specialist Services
Nationwide

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Document Control

Date	Revision	Comments
01/02/10	V1	Initial issue of Audit & Monitoring Policy
01/05/10	V2	General review of Audit & Monitoring Policy
30/09/11	V3	Complete revision and rename to 'Audit Policy & Procedures'
12/08/13	V4	General review
28/11/13	V5	Revision of the targets and BM involvement in site audits.
08/12/14	V6	Updated document name and form references and Managing Directors details
26/02/15	V7	Defined Directors and Branch Manager's audit criteria and targets. Updated site audit frequency targets. Introduced new personal monitoring target
08/09/15	V8	Update documentation, audit process to fall in line with new audit process
05/07/16	V9	Complete review by Technical team of audit criteria and targets. Updated introduction and audit programme to current procedures
29/09/17	V10	Review and add Quality Auditor, Personal Monitoring and logo
17/11/17	V11	Added HAV monitoring
09/01/19	V12	Annual review
22/01/19	V13	Added section on page 10: Project Quality Audit
27/03/19	V14	Rebrand
14/06/19	V15	Added extra information to 4.2 regarding new supervisors
26/07/19	V16	Annual review
All amendments are recorded on CD002 – 09/01/2020		

Reviewed By	Signed	Date
Helen McAuley		06/10/2020

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Section 1 – Auditing Policy Statement

This policy covers the following company's, which are all within Shield Services Group: Shield Environmental Services Ltd, Shield Fire and Security Ltd, Shield Mechanical and Electrical Services Ltd, Shield Demolition Ltd & Shield Flooring Services Ltd.

Shield Services Group are committed to providing continual development to the quality and health & safety of our work and working environment. Part of this process is to understand how well our safety, health and environmental performance is being managed and delivered throughout all levels of the business; and, more importantly, acting upon this information.

As a successful company, Shield takes pride in its work and seeks to ensure that all business risks are adequately controlled, including health & safety and environmental risks. This means we are very keen to protect and improve:

- The well-being of all our employees.
- The environment in which we operate.
- Our business reputation within the community.
- The service we deliver to our clients.

Auditing can only contribute to our goal of achieving robust safety practices and this will ensure that all our work sites, branches and vehicles are safe and without risks to health. We will strive to be the industry leader in everything we do and auditing is a key part of this.

My responsibility is to ensure the effective implementation and maintenance of a Total Quality Management System to ISO 9001 / 14001 / 50001 and 45001 standards. (Shield Environmental Services only).

All levels of Management have a role to play for providing the appropriate safe working environment and determining the procedures necessary for the promotion of health & safety at work. With correct management, auditing and monitoring we will ensure that we achieve these standards.

This policy will be reviewed regularly to meet our current legal requirements at least on an annual basis. Any revisions will be brought to the attention of our employees and discussed.

We are totally committed to achieving the best health, safety, welfare and environmental standards possible so that a positive safety culture is embedded within the business. Controlling safety risks and accidental damage can only deliver a further contribution to our profitability within this highly competitive market place.



Luke House
Managing Director
Shield Services Group

Date: 09th January 2020

Section 2 - Introduction

Introduction

Proactive Health & Safety monitoring is of key importance if we are to identify lapses in safety before an accident or injury occurs and recognise areas for improvement. Regular monitoring allows us to assess the extent of our compliance with legal obligations and maintain a safety management system.

This policy defines the framework and procedures to be followed as a means of assessing performance in safety management.

Objectives:

- Verify our compliance with Health, Safety and Environmental statutory requirements to all company operations.
- Identify needs for new or improved standards, procedures and safe systems of work.
- Promote awareness of health, safety and environmental protection.
- Have documented evidence of the issues being raised from audits and a record of the follow-up actions.
- Monitor the quantity of jobs throughout the year.
- Target a fair distribution of audits on ACMs and whether they are licensed or non-licensed works (asbestos only).
- Group all audit information relating to each Supervisor, Contracts Manager and Branch.
- Regularly review the Branch and Site Auditing process and forms to meet changing needs and new standards.
- Aim to achieve Quality, Environmental and Health and Safety and Energy objectives.

Shield Services Group will ensure:

- All employees are adequately trained and competent for the work they are required to undertake.
- All asbestos employees and employees trained to enter asbestos enclosures undergo Health Surveillance every 2 years, with records being kept for 40 years.
- Regular site checks are performed by the Supervisor to inspect the integrity and maintenance of the site setup.
- All licensed asbestos removal jobs and most non-licensed jobs (when applicable) will have a site pre-assessment undertaken by the Contracts Manager. This will ensure the safety requirements are suitable for the location, duration of works and potential hazards.
- Audits are undertaken in an unbiased way and could potentially take place at any time or place.
- Independent UKAS analytical laboratories, accredited to the ISO / IEC 17025 standard, will undertake all environmental analytical testing on behalf of Shield.
- All licensed work involving the removal or maintenance of asbestos will be notified to the relevant enforcing authority (HSE or LA). This will be given at least 14 days in advance of the work starting. In the case of an emergency, a waiver of this notice period will be requested.
- All management and technical staff will undertake audits to raise awareness of site conditions determine staff competency and ensure effective management procedures.

Section 3 – Audit programme

The Shield audit programme is a defined list of targets needed to ensure that the Health, Safety and Quality aspects of all divisions are managed effectively. All levels of management must participate and support this process to make a difference on a day-to-day level.

3.1 Site Audits:

All site audit findings will be reported to the relevant Branch Manager, Contracts Manager, Supervisor, Health & Safety Team, Divisional and Regional Directors. All issues will be recorded in the non-conformance database where the data will be compiled in the Monthly Technical Return to give feedback and action to the Divisional and Regional Directors.

Contracts Managers

It will be necessary for the Contracts Managers to visit their sites on a regular basis to assess the quality of the work and make sure that the jobs are being run as planned. During these visits they will have the opportunity to conduct the Contract Manager audit or a Site Safety Tour. Contracts Managers will have the responsibility for making sure all improvement actions have been implemented and reinforcing the audit findings with the Supervisor. This is of key importance in making sure that site-staff have the correct attitude, level of safety and quality in their work, and hence passing on the expectations set by the Directors and Branch Managers.

Branch Managers / Operations Manager (Marine)

Branch Managers are required to do 1 x safety audit every 2 months in order to be aware of site conditions and to make sure the quality of work meets their expectations. This audit requirement is defined in an audit schedule (QM099). The Branch Manager/ Operations Manager (Marine) will play a key role in following up on the audits, coordinating the actions of the Contracts Managers and company-wide improvements. Branch Managers/Operations Manager (Marine) will be involved in reviewing and offering feedback on all audits across their Branch. They will have a direct influence on improvement, preventative and disciplinary actions. All Branches will have a target of enforcing a number of CM audits per month equivalent to the number of CMs in that Branch. These audits can be shared or completed individually.

Health & Safety Advisor

The Health & Safety Advisor will have a direct influence on improvement and preventative actions from audits. The Advisor will investigate any serious breach of health and safety procedures identified within an audit. The Advisor should conduct at least one site audit per month for each division of the company. The H&S Advisor/Head of QUENSH should conduct annual Branch Audits. The H&S Advisor will manage all audit planning ensuring all audit KPI's are met and all NC's are closed down. They will have a direct influence on actions and preventative actions during and after site audits. The Advisor will investigate any serious breaches in policy and procedures identified during site audits, ISO audits or via non-conformances. Once a quarter the Advisor and Head of QUENSH will have a meeting to review performance trends within the company and identify key areas for improvement. The H&S Advisor is responsible to analyse the information gathered from the H&S Statistics, NC database and company compliance to use to create the Monthly Technical/Divisional Return to develop branch compliance.

Directors / Regional Directors

Directors are required to do 1 x safety audit every 2 months in order to be aware of site conditions and to make sure the quality of work meets their expectations. This audit requirement is defined in an audit schedule (QM099). Directors will be involved in reviewing and offering feedback on all audits across the company. They will have a direct influence on improvement, preventative and disciplinary actions. Through this review process the 'Shield Standard' will be determined.

3.2 Monthly/Divisional Technical Return

A report is produced each month to enable Branch Managers to have a monthly analysis of audits, near misses, incidents/accidents, developing trends and any complaints and non-conformities and

administration that are outstanding. The return is to be completed by the second week of the following month. The document is covering areas such as:

- Site audits and complaints
- Audit analysis against company KPI's and trends
- Outstanding non-conformities that require action from Branch and CM's
- Near miss, incidents and accidents
- Training and Mask inspection statistics

A traffic light system will be used to indicate recordings as: red poor, amber improvement needed and green good.

3.3 Branch audits

As part of our ISO accreditations, we need to conduct detailed audits of the branches on a regular basis. This will involve a review of all documentation, procedures and systems to ensure that Shield is working to the same standards across the business.

The Branch audit will be completed annually by the Health & Safety Advisor/Head of QUENSH on a specified date and with agreement of the relevant Branch Manager. The manager must be in attendance when the audit takes place. Branch audits will cover the following:

- Office Documentation
- Technical Library
- Fire Safety
- Office Gas & electrical testing
- Risk Assessments
- Accident Reporting & First Aid
- Computer Safety
- Manual Handling
- Hand Arm Vibration
- COSHH
- Waste Control
- Asbestos Management
- Training Records
- Medical Records
- Health Monitoring
- Personal Protective Equipment
- Maintenance of Equipment
- Driver & Vehicle Management
- Carriage of Dangerous Goods
- Fork Lift Trucks and Pallet trucks
- Ladders / Step Ladders / Tower Scaffold
- Safe Storage of LPG & Files
- Branch Inspection
- Store Inspection
- Parking and Yard Inspection
- Waste Transfer Station Inspection

Internal audits will be carried out on a regular basis throughout the year by the Technical Team ensuring that SES and ISO requirements are being adhered to.

3.4 Plan of work (POW) reviews (asbestos only)

Review of the content and standard of our plans of work (i.e. method statements) is a requirement for quality control. The Branch Managers/Contract Managers undertake peer review of their plan of work using form AR124 to give corrective and constructive feedback on the Plan of Works.

3.5 Personal Exposure Record

All employees who are subject to asbestos exposure are required to record their exposure each week on their time-sheets, which are inputted into Vensis by the branch admin.

All employees must record:

Working hours per day including weekend

Project number for each site worked

Exposure hours per site, per day against each type of ACM

3.6 Personal Monitoring

All employees who are subject to asbestos exposure are required to record their exposure each week on their time-sheets, which are inputted into Vensis by the branch admin.

All employees must record:

- Working hours per day including weekend
- Project number for each site worked
- Exposure hours per site, per day against each type of ACM

Personal sampling/air monitoring will be undertaken for a representative range of jobs and work methods to protect the health of employees throughout the year. It will be done at regular intervals and individuals will be selected at random and when there is a change which may affect exposure such as change in SOP's, methodology or equipment etc. The date, branch, employees name, site address and location, type of work being undertaken, ACM, reported result and calculated result, sample duration and analyst company name will be logged on to the 'Personal monitoring data spreadsheet HS033. Any calculated result level of asbestos fibres in air that exceeds the control limit measured over 10 minutes of 0.6 f/cm³ should be raised as a Non-Conformance and investigated. This spreadsheet will be stored in the personal monitoring file held at the head office in electronic format, made available to employees and will be retained for at least 40 years.

Personal sampling/air monitoring records are reviewed by the H&S Advisor each quarter as part of the ISO quarterly meeting, to make an assessment of the estimated fibre levels of employees undertaking various tasks to be detailed within the Asbestos PoW and updated annually.

Personal Monitoring should be carried out in order to target higher risk activities such as sprayed coating and insulation removal and where there is a change in methodology/techniques or concerns regarding an employee previous work or higher exposure level than anticipated or new starters.

In order to ensure consistency of approach and monitor standards the H&S Advisor will carry out an audit of the process on site when they are there at the same time as the Analyst.

Note: Example of estimated fibre levels for removal (based on last 3 years average calculated results of personal monitoring data up to 31/07/20, for: Spray Coating 0.044; AIB panels 0.032; AIB debris 0.036; Insulation 0.016; Insulation residue 0.037; Cement panels 0.020; Cement debris 0.009; Textured coating 0.015; Vinyl floor tiles 0.021; Paper 0.022; Soil contamination 0.059; AC sheets 0.026; Bitumen 0.064; Textiles 0.028; Other 0.010 f/ml;

Our Personal Monitoring strategy is to ensure sufficient accurate information is available to:

1. Record accurate cumulative exposure of employees (Fibre-hours) via Staff Timesheet/Exposure Record which is recorded onto Vensis database.
2. Identify trends and values higher or lower than anticipated (Good/Poor practice) via quarterly review and investigating exposures over 0.6f/cc.
3. Ensure Personal Monitoring is representative and can benchmark employees/branches (branches vs company average) via review of HS033 spreadsheet.

We shall monitor the following as a representative comparison across all branches.

- Asbestos Containing Material Type
- Phase of work (e.g. Removal, Cleaning, Enclosure dismantling).

Our Plan of Work will detail any air monitoring strategy and will include details of any personal monitoring. This will state which individual(s) will be monitored for which task(s) as part of our proactive approach to Personal Monitoring.

Where an analyst is client appointed, we will engage with the client and we will request that the Analysts must provide this information to the Licence holder given the personal nature of the results.

3.7 HAV Monitoring

All Employees using vibration tools **MUST** also record their daily exposure levels on using **HS024 - HAV exposure** record and their daily cumulative HAV exposure on their weekly time sheets. The Supervisor **MUST** check and verify that the daily exposure records are recorded accurately on **HS024 –HAV exposure record and employee time sheets** and to ensure the ELV is not exceeded and take appropriate action to prevent. HAV exposure records are recorded on Vensis timesheet system by branch administration and will report any exposures over 400 daily points to Technical Department for investigation and additional health screening. An exposure report will be produced from Vensis quarterly and review by Technical department. Records will be kept for 40 years and will be made available to an employee upon request. This has been added to QM092 for quarterly review.

Section 4 – Audit Frequency Targets

4.1 Focusing on the type of ACMs

The aim is to audit all licensed projects where practicable, and as well as undertaking non-licensed as and when required.

4.2 Addressing key performance indicators for Supervisors

Site Audits are a good opportunity to address individual needs and identify areas where supervisors are performing above or below standard. All supervisors should be audited on a regular and equal basis. New Supervisors joining the company will be a priority to ensure that they follow the company procedures and complete all required documentation. They will be subject to regular audits in the first month of their employment.

4.3 Equal spread across the country

To save audits being focused solely to regional areas Shield will adopt the general policy of distributing audits across the country. This will prevent operatives developing an attitude of being free from inspection when working far away.

Section 5 – Site Audits

5.1 Site auditing process

Prepare for audit:

- All Branches submit a weekly return by every Thursday of every week to the Technical Administrator who will compile the list into a geographical plan of the working area.
- The Compiled list is sent to the audits email for all of the Technical Team.
- The H&S Advisor will plan their weekly audit locations and will aim to audit new starters to the business as a priority due to their potential risk.

Site audit:

- Inspection (and obtain photographic evidence where necessary) of Site H&S, POW and documentation, Enclosure, controls and removal processes, DCU's and vehicles and equipment.
- Stop work if necessary. Wait for the issues to be resolved before work begins again.
- Report findings to the Site Supervisor. Request immediate actions to improve the job.
- Call Contracts Manager and give brief summary.
- Send the report and a summary to the Regional Director, Branch Manager, Contracts Manager, Supervisor and the Audits email for data collection.

Report audit and record findings:

- Obtain feedback and, if needs be, raise more non-conformances. All communications will be saved in the QM021 Non - Conformance Data Base.
- Raise non-conformances for all the outstanding issues to be added to the NC data base
- All audit information is saved in the Audit spread sheet.
- Email a report summary (with detailed photos) to be saved in the audit folders

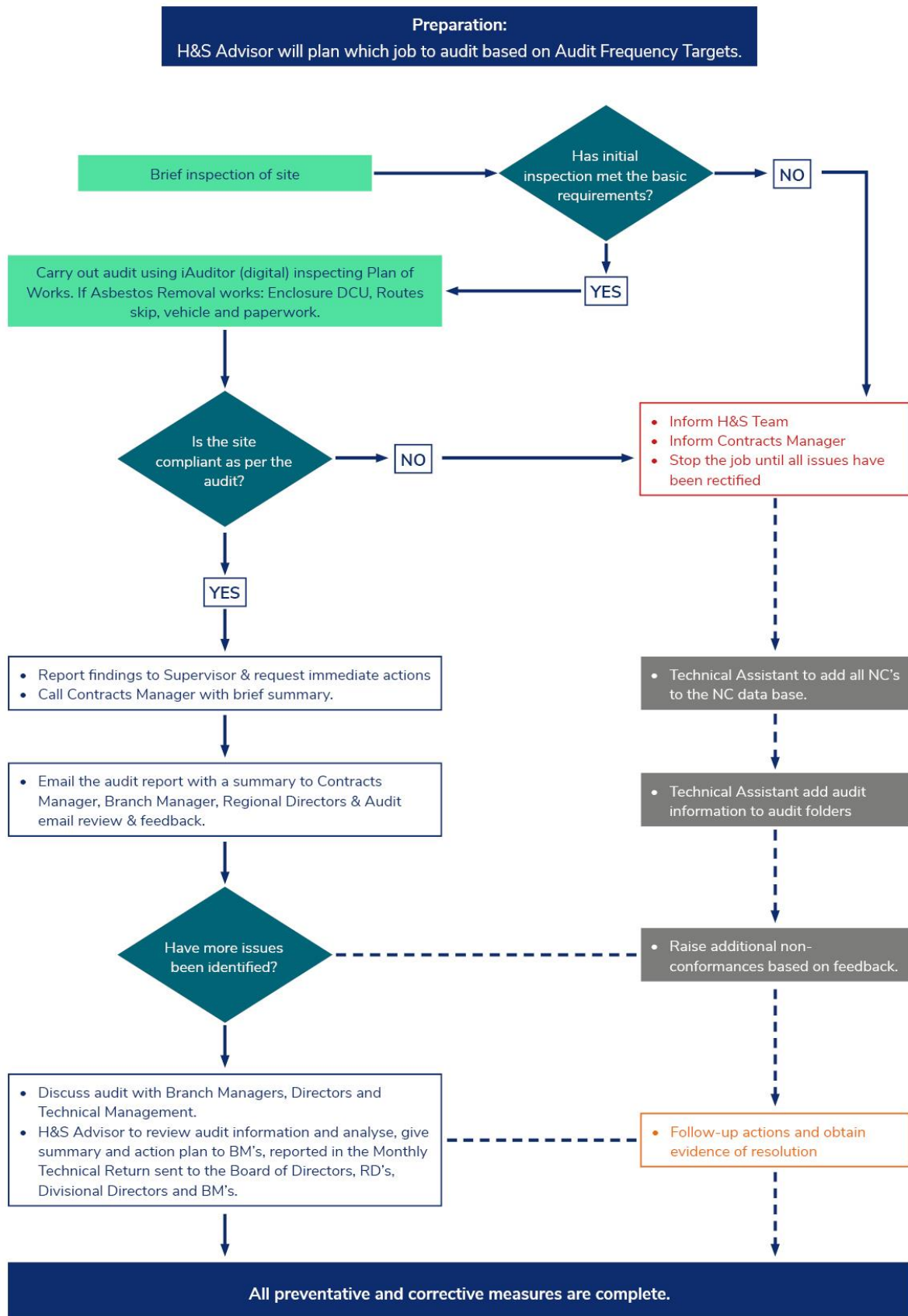
Audit findings:

- The audit information from the NC database is to be recorded in the Monthly Technical Return and communicated to the Board of Directors, Regional Directors, Divisional Directors and Branch Managers to improve the H&S management of each branch.
- If a serious breach is reported from a site audit, the Contract Manager and Supervisor will face a discipline interview with their Branch Manager.

Follow-up actions:

- The Contracts Manager, Branch Manager or Supervisor is to confirm (with evidence, where applicable) that the non-conformance (NCR) has been resolved.
- The Technical Assistant is to follow up the outstanding NCRs until completed.
- If there is a need for company-wide improvements a memo and/or a toolbox talk will be issued.
- All staff with a dirty mask will go through a disciplinary procedure to be decided by the Branch Manager and Managing Director.
- All reports of generated from site audits and there finding will be analysed, and added into the monthly Technical/Divisional Return sent out to the Board of Directors, Regional/Divisional Directors, Branch Managers and the Technical Department.
- If a STJ is issued the relevant H&S Manager will request an investigation and it is the responsibly of the Regional/Divisional Directors to report their finding, the route cause and preventative measure within one week.

5.2 Auditing Process Flow Chart



Section 6 – External Audits

6.1 HSE

The Health & Safety Executive will visit a selection of licensed asbestos removal jobs to check that Shield is meeting the safety requirements specified in asbestos legislation. This can happen at any time and without notice. They are entitled to stop our work, take statements from individuals and remove documents from site. If necessary the HSE inspector may issue improvement notices or prohibitions which we are legally obliged to comply with.

6.2 ARCA

As part of our membership to ARCA an independent audit is to be undertaken once a quarter. This will be arranged by the Asbestos Health & Safety Manager. It will be arranged at a suitable time on licensed asbestos removal work.

6.3 ACAD

As part of our membership to ACAD an independent audit is to be undertaken once a year. The Asbestos Health & Safety Manager will arrange this. It will be arranged at a suitable time on licensed asbestos removal work.

6.4 External Consultants

Occasional audits will be conducted by external consultants when the need arises or by client instruction. They will be looking to assess our health & safety processes and to confirm we are meeting the industry standards.

6.5 NICEIC

As part of our membership to NICEIC an independent audit is to be undertaken once a year. The Mechanical & Electrical Director will arrange this at a suitable time.

6.6 BAFE

As part of our membership to BAFE an independent audit is carried out every 6 months alternating the office and site visits. The Quality Manager and the Fire and Security Director will arrange this at a suitable time.

6.7 SSAIB

As part of our membership to SSAIB an independent audit is carried out every 6 months alternating the office and site visits. The Quality Manager and the Fire and Security Director will arrange this at a suitable time.



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