

ASBESTOS POLICY

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CONTENTS

1	INTRODUCTION	3
2	PURPOSE	3
2.1	Scope	4
3	DEFINITIONS	4
4	ACCOUNTABILITIES AND RESPONSIBILITIES	5
5	PROCEDURE/COURSE OF ACTION REQUIRED	6
5.1	Identification of Asbestos	7
5.2	Discovery of further Asbestos	7
5.2.1	Maintenance and Building Work	9
5.3	Emergency Procedures (Suspected Damage to Asbestos Containing Materials)	10
5.4	Asbestos Register	10
5.5	Monitoring	10
5.6	Training	11
5.7	Surveys and inspection undertaken by appointed consultants/surveyors	11
5.9	Permit to Work & Associated Record Keeping	11
6	TRAINING	12
6.1	Equality Impact Assessment	12
7	MONITORING COMPLIANCE	12
8	REFERENCES	14
9	ASSOCIATED DOCUMENTATION	15
10	VERSION HISTORY TABLE	15
11	APPENDIX A – EQUALITY IMPACT ASSESSMENT	16
12	APPENDIX B – CONSULTATION TEMPLATE	17
13	APPENDIX C – PROCEDURES – ASBESTOS	18
14	APPENDIX D – ASBESTOS INCIDENT FLOWCHART	19
15	APPENDIX E – RECORD OF SUSPECTED EXPOSURE TO AIR BOURNE ASBESTOS	20
16	APPENDIX F– GLOSSARY	21
17	APPENDIX G– HAZARDOUS FIBRE PERMIT	22
18	APPENDIX H– GUIDANCE	23
19	APPENDIX I– LEGISLATION	24

1 INTRODUCTION

This document sets out the policy and procedures for managing asbestos on all Trust sites owned, occupied or operated by Croydon Health Services NHS Trust. The Trust has a legal duty to manage the risk from asbestos or to co-operate with whoever manages this risk to ensure that persons are not exposed to contaminated airborne dust. Persons whose normal duties may bring them into contact with Asbestos Containing Materials (ACMs) will be trained to recognise asbestos products and work to approved safe procedures.

This document is to be read in conjunction with 'A Comprehensive Guide to Managing Asbestos (HSG 227). The Control of Asbestos Regulations 2012. Approved Code of Practice "The Management of Asbestos in non-domestic premises and the Approved Code of Practice (ACOP) L143.

This guidance memorandum is not an authoritative interpretation of the Regulations or other associated laws which can only be fully interpreted by the Courts.

2 PURPOSE

This document, sets out the procedures to manage the presence of asbestos, which is known or is found to be located in the Trust premises, and for controlling the risk presented by such products and monitor to ensure a safe environment for patients, staff, residents and other persons working or using its premises. It also covers the survey and investigation work undertaken by Asbestos surveyor staff.

Asbestos is a natural material (a fibrous silicate) found in rocks all over the world. It has been commercially used for about 150 years because it is strong, flexible, stable and fire proof. The three main types of asbestos that were used in the UK are:

- Crocidolite (Blue asbestos)
- Amosite (Brown asbestos)
- Chrysotile (White asbestos)

These cannot be identified by their colour alone.

In addition the following three types of asbestos have been known to be used (although in smaller amounts) within the U.K:

- Fibrous Anthophyllite
- Tremolite
- Actinolite

For the purpose of this document all types of asbestos (crocidolite – blue asbestos) (amosite – brown asbestos), (chrysotile - white asbestos), (anthophyllite), (tremolite), (actinolite) and any mixture containing any of these materials, will be treated the same and will be defined generally as the term asbestos.

Although it is now illegal to use asbestos in the construction or refurbishment of any premises, many asbestos containing materials, which were used in the Trust buildings between 1950-1980, remain in place. However, it is reassuring that as long as such materials are in good

condition and not disturbed or damaged there is no risk and need not removed. They can, however, become a danger to health if disturbance or damaged allows asbestos fibres to be released into the air where people can breathe them in.

The Trust will take all reasonable and practicable steps to secure the health, safety and welfare of staff, patients, visitors and contractors who may foreseeable be exposed to asbestos. The aims of this document are to:

Keep exposure to and risks from asbestos to a minimum.

Provide a high quality asbestos management service within the Trust premises.

Make our staff and contractors aware of the presence of asbestos containing materials when found and the procedures in place to deal with these.

This document applies to all trust staff and any contractors working on trust sites.

All asbestos will be maintained in a sealed and safe condition or will be removed as part of an on-going maintenance programme. The Director of Estates will be responsible for the implementation of this document.

The Estates and or the Projects Department staff must adhere to this document when they invite contractors on to the Trust premises. The contractors **MUST** liaise with the Estates Department before work commences. They must be advised on procedures by the Estates Department.

2.1 Scope

The Control of Asbestos Regulations 2012 apply to all sites owned, occupied or operated by Croydon Health Services NHS Trust where there is a risk of any person being exposed to asbestos dust.

3 DEFINITIONS

Asbestos Management Plan	A premises specific Asbestos Management Plan.
Asbestos Survey/Register	Hard copy and/or electronic record system used to provide up to date information on the location and condition of asbestos and/or asbestos containing materials (ACM)'s in all premises where this policy applies.
Contractor	A firm or person who has entered into an agreement with the Trust to carry out work for the Trust.
Contractors Handbook	Contractor Handbook issued at tender stage.
Contractors Agreement Document	Contract document, setting out the Trust health, safety and environmental and statutory requirements and standards.
Contract Controller	Person appointed by the Trust in the contract document to act as the Engineer and Contract Administrator.
Site Risk Manager	The Contractor's responsible person for advising on health, safety and environmental matters at the premises where the work is to be

	or is being carried out and ensuring standards are met.
Designated Officer/Responsible Person - Asbestos	Person formally appointed to be responsible for the day to day management of the Asbestos Register(s) and to carry out duties as detailed in this policy. (eg Asbestos Skip is provided at premises where asbestos containing materials are to be placed securely, pending removal by specialist licensed contractor. ensuring annual Respiratory Protective Equipment (RPE) fit tests are carried out and records held on the EF Network drive.
Asbestos Management Algorithm	A simple risk scoring system to allow the Trust to rate the risk to health, taking into account not only the condition of the ACM's but also the likelihood of people being exposed to the fibres as set out in Appendix 2 and 3 of HSG227. this algorithm is used to inform the Asbestos Management Plans and the Asbestos Risk Register(s).
Permit to Work	A permit-to-work is a document which specifies the work to be done and the precautions to be taken. Permits-to-Work form an essential part of safe systems of work for many types of maintenance activities.
Risk Assessment and Method Statements (RAMS).	A method statement is a system of recording the hazards involved in specific work or tasks and communicating the risk and precautions required to all those involved in the work.
Trust	Croydon Health Services NHS Trust
Premises	All hospital sites owned, occupied or operated by Croydon Health Services NHS Trust.

Abbreviations

ACOP – Approved Code of Practice issued by HSE
 ACM – Asbestos Containing Materials
 HSE – Health and Safety Executive
 HSG – Health and Safety Executive Guidance Note
 HSG 264 – Asbestos; The Survey Guide

4 ACCOUNTABILITIES AND RESPONSIBILITIES

Chief Executive

The Chief Executive has the overall authority and responsibility for ensuring compliance with the Health & Safety at Work etc Act 1974 and the Control of Asbestos Regulations 2012.

Responsible Person – The Director of Estates and Facilities – is responsible for ensuring that the asbestos products found in the Trust buildings are identified and managed in accordance with the Control of Asbestos Regulations 2012 and Approved Codes of Practice. He should formally appoint Designated Officers from the Estates and Projects Departments to manage day-to-day issues arising.

Designated Officer (or his/her deputy) – Shall be responsible for managing day-to-day issues arising from works associated with asbestos. He/she shall provide access for others to asbestos surveys, records and be general point of contact on site. He/ she shall be responsible for ensuring all employees and contractors receive refresher asbestos awareness training. Responsible for ensuring an Asbestos Skip is provided at premises where asbestos containing materials are to be placed securely, pending removal by specialist licensed contractor. He/ she shall ensure annual Respiratory Protective Equipment (RPE) fit tests are carried out and records held on the EF Network drive. The duties of the Designated Officers should be set out in their job description and person specification.

Occupational Health Department- shall advise staff and managers, undertaking health surveillance where, following a risk assessment there is a risk which cannot be eliminated or controlled or where there has been an exposure above the airborne exposure limit (control limit), this will be dependent on the time exposed. The nature of the health surveillance will be dependent on the risk following advice from the Occupational Health Consultant and may require an asbestos appointed doctor to undertake these. The Occupational Health Consultant will undertake required reporting of RIDDOR if required, in the instance of occupational related diseases of Mesothelioma, Asbestosis or Lung cancer are diagnosed.

Employees – Shall work in a manner which reduces the possibility of damaging or disturbing asbestos containing materials, (ACMs), and to comply with the Trust policies.

Advisor – Specialist External Consultant - Shall provide expert advice on the proposed management of ACMs, guidance on legislation and methods of works.

Analyst – Shall carry out independent evaluation of potential asbestos containing materials, carry out smoke tests to containment areas and air tests in areas which have been stripped of asbestos prior to re-occupation and so on.

Approved Contractor – Shall supply sufficient method statements to ensure safe working within the area to the satisfaction of the Advisor. Such method statements shall include risks posed by injury to staff, actions in the event of 'Fire' and so on.

The Contract Controller who engages and manages Contractors who carry out work at trust sites shall be responsible for ensuring that Contractors are logging in/out and the nature of the works detailed. The Designated Officer shall ensure that the proposed works are assessed in terms of asbestos risk and method statements (RAMS) prepared as required.

The Estates Information Services Officer – Shall update the Asbestos Register as advised by the Responsible Person or the Designated Officers.

Senior Asbestos Consultant shall be responsible for the work undertaken by the Asbestos Surveyors.

5 PROCEDURE/COURSE OF ACTION REQUIRED

Annual Asbestos surveys are carried out on all Trust properties by approved consultants. ACM's to be identified or presumed. The results of the surveys and inspections are held on the Trust MiCAD system and a copy entered on a data base linked into FM Facilities Management System. Job cards printed will automatically print asbestos warning in red with database information (TBC)

5.1 Identification of Asbestos

The Responsible person shall arrange for non invasive), surveys to be carried out as defined in the Control of Asbestos Regulations 2012 and in accordance with HSG 264; The Survey Guide.

Asbestos products identified will be recorded in the Asbestos Register held in the Engineers Office Estates Department Library and in the Estates Computer Network, and shall be accessible by all Estates/Projects Officers. The Contract Controller / Supervising Officer for each project or task shall have sufficient access to allow identification of areas and materials, which will require to be considered. Sufficient detail shall be provided to each Contractor to ensure he is aware of the extent of any asbestos within the proposed working area(s).

5.2 Discovery of further Asbestos

It is recognised that asbestos products were widely used and previously undiscovered products still may be found on the Trust properties. If concerns exist as to potential asbestos contained materials, work shall cease immediately and the Supervisor and/or the Contract Controller informed. If after inspection, there is any doubt as to whether the product contains asbestos, the Designated Officer shall arrange for tests to be carried out. If the product is found to contain asbestos he must inform the Senior Asbestos Consultant, who, shall carry out a formal assessment and ensure the Asbestos Register is updated by the Estates Information Services Officer

The risk assessment shall be carried out in accordance with HSG 264 and the resulting rating shall identify whether the product can be safely managed or should be removed. Where the cost of removal would require tenders to be sought in line with the Trust's Standing Financial instructions, the project shall be referred to the appropriate procurement personnel.

The procedures given in APPENDIX 1 Procedures – Asbestos Term Contract Flow Chart should be followed, so far as reasonably practicable.

Any material that has been sealed or protected, regardless of its condition category, shall be recorded as such. This must include areas sealed during the course of the survey following sampling and emergency repairs. Note: A material in a condition that is assessed, as 'EXTREME RISK' must be reported to the Responsible Person or designated Officer without delay.

The risk assessment shall include a Material Assessment and a Priority Assessment. The Material Assessment shall look at the type and condition of the asbestos containing material (ACM) and the ease with which it will release fibres if disturbed. The following four parameters are to be considered:

- Product Type
- Condition
- Type Of Finish
- Asbestos Type

The Priority Assessment shall look at the likelihood of someone disturbing the ACM. The three following parameters are to be considered:

- Vulnerability
- Human Exposure Potential
- Extent of ACM

Each of the parameters shall be scored between 0 and 3 and the scores for each ACM occurrence added to give a total score between 4 and 24 which is then given a risk rating as follows:

4 – 10	Very Low
11 – 15	Low
16 – 20	Medium
21 – 24	High

Any remedial works shall have been identified as part of the risk assessment, however, it will not normally be necessary to further seal, enclose or remove materials containing asbestos that are sound, undamaged and unlikely to release dust. These will be managed as follows:

- Where undamaged asbestos containing materials are specifically identified, left in situ and managed, the location must be noted on the premises survey and record on the Asbestos Register.
- The presence of any material containing asbestos must be noted on the premises survey and record on the Asbestos Register, and updated as soon as removal is carried out.
- Periodically, re-inspection will be undertaken by externally appointed Asbestos Surveyors to assess DETERIORATION in accordance with the table below.

RISK ASSESSMENT	INSPECTION FREQUENCY
>21 High	Once per three months or reported damaged
20– 16 Medium 15- 11 Low	Annually or on reported damage
<10 Very Low	On maintenance works only

Periodically, re-inspection must be undertaken by the Asbestos Surveyors to ensure the condition of the material has not changed. The inspection will be visual only to avoid unnecessary disturbance or fibre release and will not involve removal of covering material, eg duct panels or ceiling tiles. The frequency of inspection should reflect the risk assessment score. Guidance on the frequency of inspection is given below.

A Record of All Inspection must be Maintained

RISK ASSESSMENT	INSPECTION FREQUENCY
>21 High	Monthly or reported damaged
20– 16 Medium 15- 11 Low	Every 6 months or on reported damage
<10 Very Low	Annually or on reported damage

The position of warning signs and labels on asbestos containing materials is beneficial in decreasing the chance of inadvertent damage and exposure. However, labelling is not always appropriate in certain environments and where the label may cause undue distress or fear in the building occupants. Therefore, in discreet or high-risk areas, e.g. boiler houses, plant rooms, equipment stores rooms, asbestos labels should be used. Where the Responsible Officer

believes labelling could cause alarm or malicious damage, e.g. in common or public areas of buildings, a decision may be taken not to label items with asbestos labels. If this is so the Responsible Officer must ensure that all staff involved in maintenance or building works, are aware of the presence of asbestos containing materials and the procedure for responding to changes in condition, or damage to such materials. Also records containing such information must be made available to them.

At present, to avoid causing undue distress of fear to patients, staff, visitors and member of the public, the Trust uses a coding system, consisting of a **BLUE SPOT** stuck on all asbestos containing materials identified in common or public areas within the Trust buildings.

Estates and Projects Department Staff, will ensure the Management of Asbestos in accordance with the requirements of this Schedule.

If, on inspection, any material containing asbestos is found to be damaged or deteriorated, the Responsible Person shall ensure it is reassessed and reclassified.

5.2.1 Maintenance and Building Work

When drawing up specifications for any building and maintenance works, the appointed Consultant/Contract Administrator/Estates Manager/Supervisor must take all reasonable precautions to determine whether asbestos is present including consulting the premises Asbestos Register/Survey and drawings. Any information regarding the presence of asbestos shall be passed on to contractors and or direct labour, together with a warning that not all asbestos containing material may have been identified.

Prior to undertaking any work which “may be liable to disturb asbestos” a “suitable and sufficient” i.e. refurbishment & demolition survey shall be undertaken so as to ensure full compliance with CAR 2006 and HSG 264. This type of survey is fully intrusive in nature (but can be localised) and will cover the fabric of the building as well as all areas not covered or inspected during the asbestos management survey. The R&D survey should be undertaken in EVERY area where works are planned to be undertaken.

The Trust and every contractor shall aim to prevent the exposure of employees to asbestos. The following measures shall be implemented to reduce the risk of exposure to asbestos.

The removal of materials containing asbestos before any major work begins.
Work methods which minimise breakage, abrasion, machining or cutting of asbestos materials.
Dust suppression by wetting where appropriate.
Segregation by not carrying out asbestos work and other work in the same place at the same time.

Any contractor intending to undertake work with any asbestos must comply with the Control of Asbestos Regulations 2012.

To comply with the European Asbestos Worker Protection Directive the process for removing ACM's has been altered within CAR 2012. As such ALL work with asbestos is notifiable to the Health & Safety and is classed as either:

- 1.>NNLW - Notifiable Non-Licensed Work or:
2. NLW - Notifiable Licensed Work

All Asbestos Works which are identified as required whether through planned works or reactive response, will be channelled through the Designated Asbestos Officer to the appointed Asbestos Consultant for review and referral to tender/pricing.

As part of this process, all works will have a job specific scope of works produced by the asbestos consultant for obtaining prices for removal.

Where the cost of removal would require tenders to be sought in line with the Trust's Standing Financial instructions, the appointed asbestos consultant will produce a detailed asbestos tender specification in line with the terms of the consultants appointment. All sealed tenders will be instructed to be returned direct to the trust procurement team.

5.3 Emergency Procedures (Suspected Damage to Asbestos Containing Materials)

If it is suspected that an asbestos-based material has been damaged, the immediate area must be evacuated at once. The Estates an/or Projects Department Designated Officer MUST be informed. The Designated Officer, or out of normal working hours, the on-call Engineer will attend the site, ascertain the extent of any potential contamination and advise on the appropriate course of action.

If the Designated Officer is of the opinion that the material does contain asbestos, a sample of the material, shall be sent for analysis as a matter of urgency.

On completion of the cleaning, the Designated Officer will inform staff and contractors that the area is safe for normal access and remove any barriers, etc.

The Estates and/or the Projects Department to determine the cause will carry out an investigation into the incident. The report, findings and recommendations concerning the incident will be issued to the Director of Estates and/or the Capital Programme Director for appropriate action.

The procedures given in APPENDIX 2; Asbestos Incident Reporting Flow Chart should be followed, so far as reasonably practicable, in the event of an emergency.

The release 'out of, or in connection to, work' of Asbestos fibres is reportable to the HSE as a 'dangerous occurrence' under RIDDOR. The Trust Risk and Safety Department shall also be informed and an Datix web DIF1 form submitted. Confirmed exposures should be noted in personnel records and occupational health records. A form is set out in APPENDIX 3. A copy of this should be given to the employee and retained for 40 years. Staff who may have been exposed should be offered health counselling from the Occupational Health Department.

5.4 Asbestos Register

The **Designated Officer** will ensure that the Asbestos Register is updated as required. The register, maintained by the Estates Information Services Officer, shall be held electronically, given details of the materials, assessments, locations and shall be augmented by CAD drawings showing the room locations of identified or suspected materials. Drawings shall be updated by the Estates Officer (CAD) as and when changes occur.

All persons who supervised any work with asbestos are responsible for complying with relevant procedures and if in doubt for seeking advice and assistance from the Senior Asbestos Consultant, and shall have access to the Electronic Asbestos Register for all Trust premises as required.

5.5 Monitoring

The **Designated Officer** shall ensure that a system of inspection to monitor known areas containing asbestos is maintained.

Employees and Contractors MUST be instructed to report any damage that occurs to material containing asbestos immediately, (verbally), to the Designated Estates and/or Projects Officer

and confirmed in writing by the Contractor on Company Headed Paper as soon as possible thereafter. A Datix incident DIF1 form shall be completed, (see previous RIDDOR references).

The Designated Officer will maintain records of all monitoring and all analytical results through the use of the current electronic system; MICAD.

No products containing asbestos shall be used in any new construction or installation unless no other alternative exists. Where asbestos based products MUST be used, it shall only be introduced after consultation with the Responsible Person and the Senior Asbestos Consultant, completions of the risk assessment and agreement made that a suitable management system can be introduced.

5.6 Training

All Estates/Projects staff likely to access areas that may contain asbestos shall be given awareness training, updated annually, by a suitably qualified asbestos consultant. The Staff Health and Safety Policy Manuals shall include reference to Trust Policies on asbestos, identify the Designated Estates and Projects Officers and how the Asbestos Register can be accessed.

Contractors who regularly access areas, which may contain asbestos, will be requested to demonstrate that they have in date asbestos awareness training by producing a copy of their certificate. The certificate must be in date i.e. less than 1 year old and must have been issued by a qualified asbestos trainer/consultant. Online asbestos awareness certificates are not sufficient. Contract Administrators who raise orders for such works shall be responsible for ensuring that such works are assessed and method statements prepared.

5.7 Surveys and inspection undertaken by appointed consultants/surveyors

All surveys, sampling and investigations into the presence of asbestos on trust premises shall be carried out only by the trust's appointed asbestos surveying company or appointed asbestos consultant. Full roles and responsibilities of the appointment are detailed within the tender documentation and contract of appointment.

5.8 Asbestos Register

- The Asbestos Register(s) for each premises is monitored by the Designated Officer.
- All surveys and monitoring of the premises are maintained by the appointed Asbestos surveyor/consultant
- Each ACM found or presumed forms an individual entry on the Trust Asbestos Register.
- All surveys will produce material assessment scoring and priority assessment scoring in line with HSG 264 and HSG 227. Once the report is issued the designated officer will review the priority assessment scoring to ensure the overall assessment risk evaluation (total score) is correct.
- The data base can produce individual print outs of ACM details to provide information to staff and others and also summary reports.
- The Designated officer is responsible for ensuring relevant information from the relevant premises Asbestos Register and safe method of work is passed over the Estate Officer, Estate Supervisor, Contract Controller who attaches this to the Trust Permit to Work Completed as required.
- All contractors shall be made aware of this policy and procedure, as well as details of the location of all known ACM's prior to commencing works or at any pre-contract stage.

5.9 Permit to Work & Associated Record Keeping

It is the responsibility of the Designated Officer to ensure a permit to work system is in operation and keep records of all permits issued.

All related asbestos records should be kept indefinitely under the Trust and Departmental archives.

6 TRAINING

Croydon Health Services NHS Trust will ensure that adequate instruction, information and training is given to all employees who are liable to be exposed to asbestos and ACM's and the protective and preventive measures to be employed.

6.1 Equality Impact Assessment

The Equality Impact Assessment for this policy is attached in Appendix A.

7 MONITORING COMPLIANCE

This policy will be monitored by the Designated Officer - Asbestos and reviewed annually or sooner if circumstances deem it necessary. The arrangements for monitoring compliance are set out in the table below:-.

The following table may be useful for ensuring key requirements are monitored.

Element to be monitored	Lead	Tool	Frequency	Reporting arrangements	Acting on recommendations and Lead(s)	Change in practice and lessons to be shared
Appointment of Designated Officers – asbestos in writing	Director of Estates & Facilities	Performance & Statutory Compliance Audit Form	6 monthly	HSEGC EF Performance Review Meetings Trust Board Reports	Designated Officers asbestos	HSEGC EF Performance Review Meetings Trust Board Reports
Asbestos Register readily available and maintained up to date for all premises, as applicable	Head of Performance & Statutory Compliance.	Performance & Statutory Compliance Audit Form	6 monthly	As above.	Designated Officers asbestos	As above.
Asbestos Management Plans for relevant premises maintained up to date and fit for purpose.	Head of Performance & Statutory Compliance.	Performance & Statutory Compliance Audit Form	6 monthly	As above.	Designated Officers asbestos	As above.
Asbestos Priority Algorithm for all relevant premises maintained up to date and fit for purpose.	Head of Performance & Statutory Compliance.	Performance & Statutory Compliance Audit Form	6 monthly	As above.	Designated Officers asbestos	As above.
Evidence of Annual Asbestos Surveys being carried out & used to inform the relevant Asbestos Register and the Asbestos	Head of Performance & Statutory Compliance	Performance & Statutory Compliance Audit Form	6 monthly	HSEGC	Designated Officers asbestos	As above.

Management Plan						
Respiratory Protection Equipment – Face Fit Records	Head of Performance & Statutory Compliance	Performance & Statutory Compliance Audit Form	6 monthly	HSEGC	Designated Officers asbestos	As above.

8 REFERENCES

There are a large number of official publications relating to Asbestos at Work. The following list contains the most significant and relevant items, but is not exhaustive. For an up to date list refer to: <http://www.legislation.gov.uk/ukxi/1998/2451/contents/made>

- Health and Safety at Work Act 1974
- The Control of Asbestos Regulations 2012
- Management of Health and Safety at Work Regulations 1999
- The Environmental Protection Act 1990
- The Classification, Packaging and Labelling of Dangerous Substances Regulations (2008)
- The Control of Pollution (Special Waste) Regulations 1980 as amended.
- The Personal Protective Equipment at Work Regulations 1992
- Reporting of Incidents, Diseases and Dangerous Occurrence Regulations 1995
- Control of Substances Hazardous to Health Regulations
- Confined Spaces Regulations 2007
- Chemical (Hazard Information and Packaging for Supply) Regulations 2009
- Construction (Design and Management) Regulations 2007
- Work at Height Regulations 2005, as amended by the Work at Height (Amendment) Regulations 2007.
- The Fire Safety (Employees' Capabilities) (England) Regulations 2010
- Health and Safety (Offences) Act 2008
- Corporate Manslaughter and Corporate Homicide Act 2007.
- The Confined Spaces Regulations 1997
- The Employment Rights Act 1996
- Public Interest Disclosure Act 1998 (PIDA)
- The Control of Lead at Work Regulations 2002
- The Control of Noise at Work Regulations 2005
- The Electricity at Work Regulations 2007
- The Working Time Directive Regulations 1998
- The Gas Safety (Installation & Use) Regulations 1998
- The Occupiers Liability Acts 1957 and 1984.

HSE Approved Codes of Practice (ACOP)

- L21: Management of Health and Safety at Work Regulations 1992
- L27: The Control of Asbestos Regulations 2012
- L127: The management of Asbestos in non-domestic premises, 2006.

HSE Guidance Notes Relating to Duties of Licensed Contractors

HS(G)37: An Introduction to Local Exhaust Ventilation.

HSG 53: Respiratory Protective Equipment at work: A practical guide, 2010.

HSG 248: The Analysts Guide for Sampling, Analysis and Clearance procedures, 2005.

HSG 264: Asbestos; The Survey Guide.

HSG 247: Asbestos: Licensed Contractors' Guide, 2006.

EH10: Asbestos: The Analysts' guide for sampling, analysis and clearance procedures.

EH40: Occupational Exposure Limits.

9 ASSOCIATED DOCUMENTATION

Health & Safety Policy
 Personal Protective Equipment Policy
 Contractors Handbook
 Contractors Agreement Document
 Trust Permit to Work Forms
 Asbestos Management Plans
 Asbestos Register (s)
 Asbestos Surveys
 Pre – Contract Meetings Agenda and minutes.
 Incident Management and Investigation Policy
 Working at Heights Policy
 Fire Safety Management Policy
 Waste Management Policy – Part 1.
 Waste Management Policy – Part 2.
 Policy for the effective management of the environment
 Infection Control Policy
 Electrical Policy
 Security Management Policy
 Lone Worker Policy
 Violence at Work Policy
 Manual Handling Policy
 Risk Management Strategy
 Risk Assessment Policy

NB - This policy list is being continuously updated. Accordingly, please refer to hospital intranet for the up to date list.

10 VERSION HISTORY TABLE

Version	Date	Author	Ratified by	Comment/Reason for change
1	August 2009	Richard Parris	Health & Safety Committee	New
1.1	August 2009	Richard Parris	Health & Safety Committee	Change of Trust's name and logo to reflect integration
2	March 2013	Mike Parkhill	Policy Committee	Policy updated in line with current practice

11 APPENDIX A – EQUALITY IMPACT ASSESSMENT

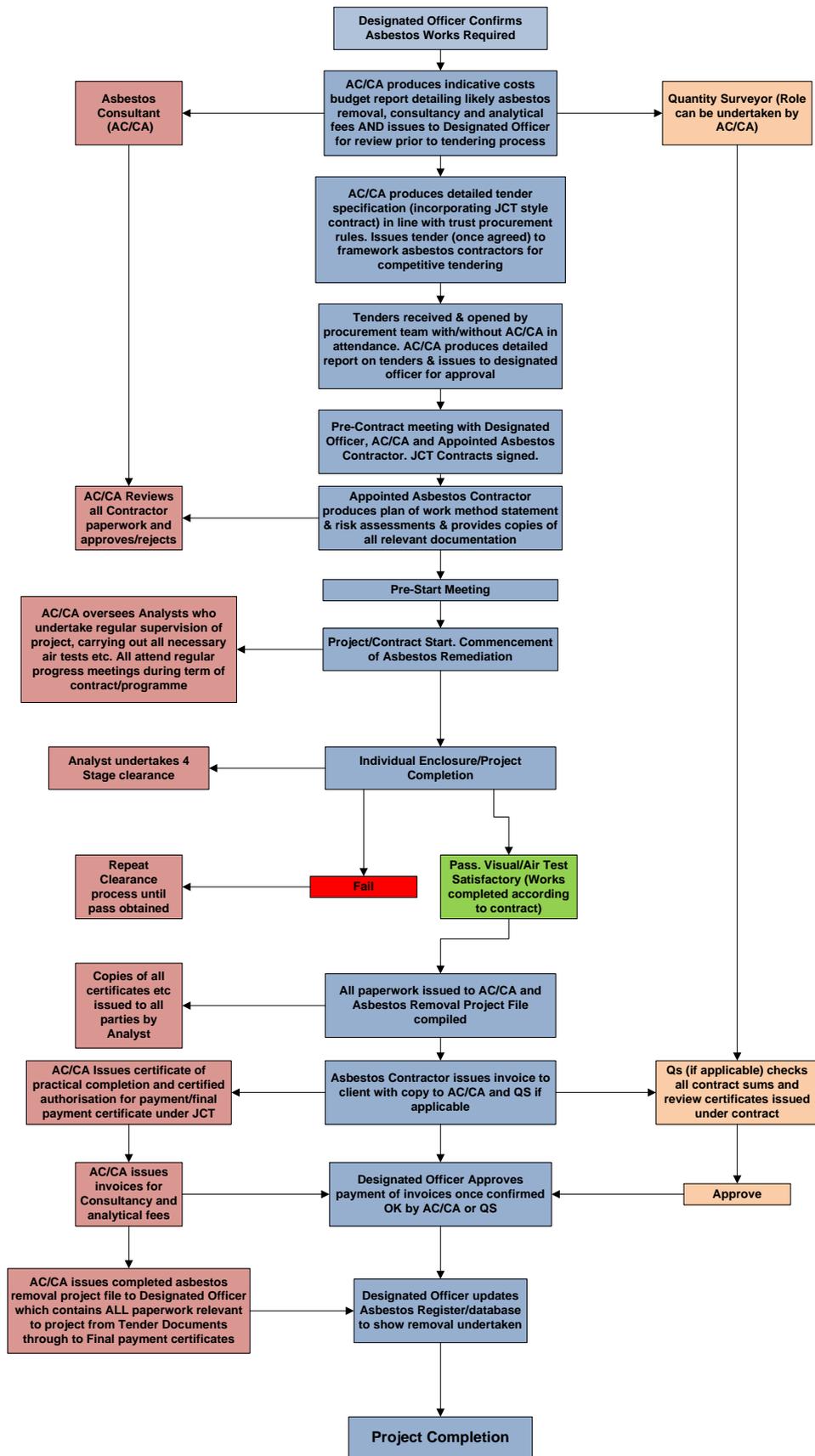
To be completed and attached to any procedural document when submitted to the appropriate committee for consideration and approval.

		Yes/No	Comments
1.	Does the policy/guidance affect one group less or more favourably than another on the basis of:		
	• Race	No	
	• Ethnic origins (including gypsies and travellers)	No	
	• Nationality	No	
	• Gender	No	
	• Culture	No	
	• Religion or belief	No	
	• Sexual orientation including lesbian, gay and bisexual people	No	
	• Age	No	
	• Disability - learning disabilities, physical disability, sensory impairment and mental health problems	No	
2.	Is there any evidence that some groups are affected differently?	No	
3.	If you have identified potential discrimination, are there any exceptions valid, legal and/or justifiable?		
4.	Is the impact of the policy/guidance likely to be negative?		
5.	If so can the impact be avoided?		
6.	What alternative are there to achieving the policy/guidance without the impact?		
7.	Can we reduce the impact by taking different action?		

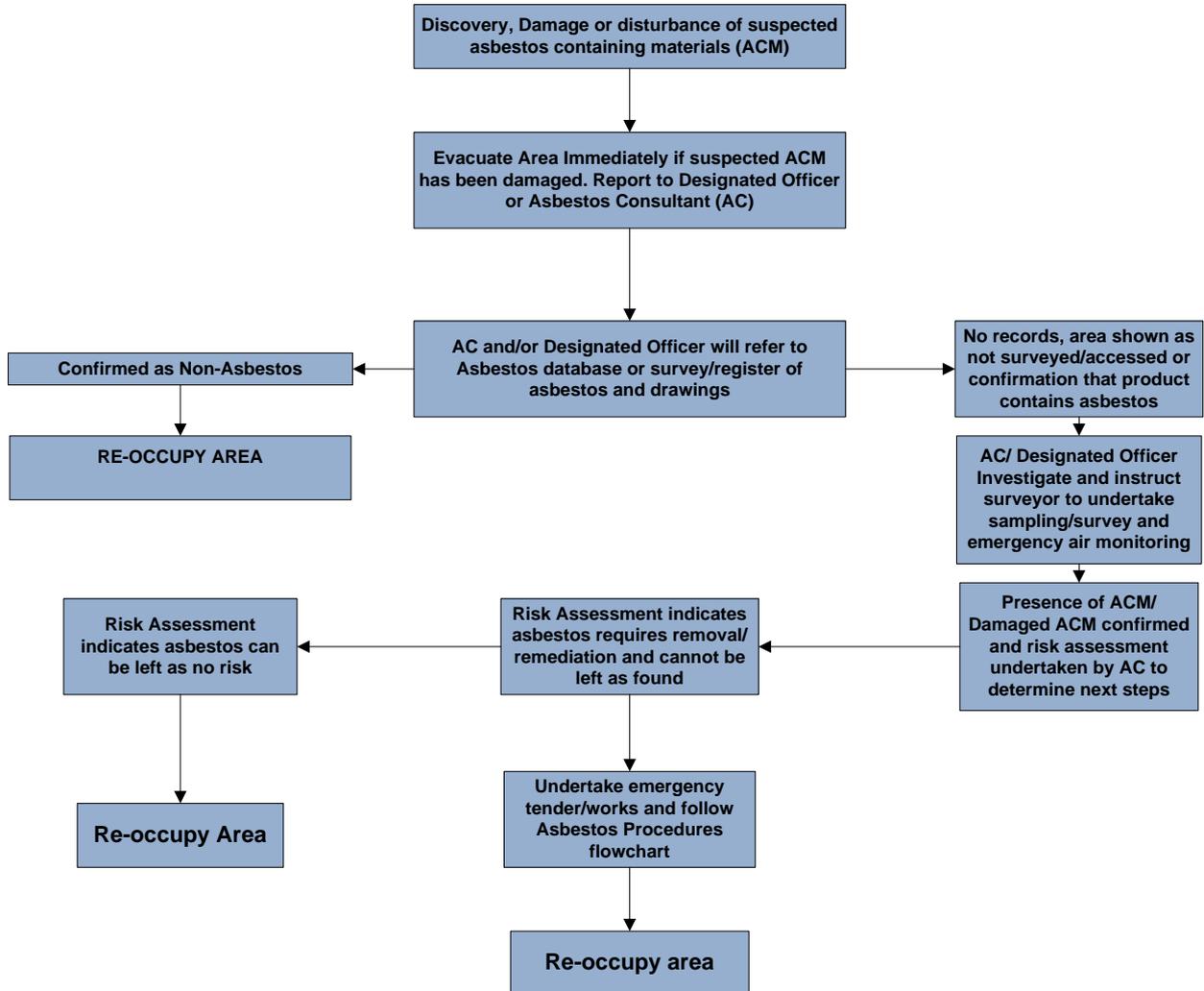
12 APPENDIX B – CONSULTATION TEMPLATE

1.	Procedural Document's Name:	Asbestos Policy
2.	Procedural Document Author:	Designated Officer – Asbestos
3.	Group/Committee Consulted:	Estates & Facilities Health & Safety Group (HSG) & thereafter the Policy Committee.
4.	Date of Consultation:	1 st December 2011
5.	Comments Received:	
6.	Highlight where policy changed following consultation or state reasoning why comments not incorporated:	

13 APPENDIX C – PROCEDURES – ASBESTOS



14 APPENDIX D – ASBESTOS INCIDENT FLOWCHART



15 APPENDIX E – RECORD OF SUSPECTED EXPOSURE TO AIRBOURNE ASBESTOS

Record Of Suspected Exposure To Airborne Asbestos

A COPY OF THIS FORM SHOULD BE GIVEN TO THE EMPLOYEE AND THE ORIGINAL KEPT ON THE EMPLOYEE'S PERSONNEL RECORD. THIS RECORD SHOULD BE KEPT BY THE EMPLOYER FOR 40 YEARS.

Personal Details

Name: _____ Date Of Birth: _____
 Address: _____ Job Title: _____

During the course of my work on _____ (date) I was exposed to what I believe to Asbestos, the details of this being as follows:

Name Of Establishment/Address Where Exposure Suspected To Have Occurred.

Property Concerned: _____
 Address: _____

Location Of Suspected Asbestos:

Exact Location: _____
Specify Use If Known: _____
Asbestos Accidentally Damaged Or Disturbed By You <input type="checkbox"/>
Asbestos Damaged/Disturbed Before Work Commenced <input type="checkbox"/>
Types Of Work Being Done: _____
Equipment Being Used: _____

Signature of Staff Member: _____

Supervisor To Complete:

Tick If Employer Informed: Directorate: _____ Name Of Person Informed: _____

Date: _____ Time: _____ Employer Comments: _____

Follow-Up Action Required: _____

Name Of Supervisor: _____ Signature Of Supervisor: _____

Where employees are exposed to asbestos above the "Action level", the employer is obliged to keep health records for the affected persons. Such records must be kept for at least 40 years. Employees who are exposed to asbestos above the "action level" are required to undergo medical surveillance. Medical examinations prior to employment and the intervals not exceeding two years must be provided by employer. After a medical examination, the Employment Medical advisor or the appointed doctor is required to issue a certificate of the examination to the employer and the employee stating that an examination has been carried out and the date of examination. The employer is obliged to keep the certificate, or copy, for at least four years from the examination date. The employer is also obliged to provide the appropriate facilities, which enable medical examinations to be carried out, and employees are obliged to present themselves for such examinations.

16 APPENDIX F– GLOSSARY

Glossary Of Items

ACM	Asbestos Containing Material
ACOPs	Approved Codes of Practice
ACMs	Asbestos Containing Materials
CAD	Computer Aided Design
CAWR	Control of Asbestos at Work Regulations
COSHH	Control of Substances Hazardous to Health
HSC	Health and Safety Commission
HSE	Health and Safety Executive
MDHS	Methods for the Determination of Hazardous Substances
NHS	National Health Service
PPE	Personal Protective Equipment
RIDDOR	Reporting of Injuries, Diseases and Dangerous Occurrences Regulations
TICA	Thermal Insulation Contractors Association

17 APPENDIX G– HAZARDOUS FIBRE PERMIT



Hazardous Fibre Area permit		Permit No	
Works Request/ Docket No.		Sheet No. 1	No. of sheets
Is this area listed in the Asbestos register? If in doubt then assume hazardous fibres are present and issue a PERMIT.			
PART 1 Authorisation <i>To be completed by the authorised person responsible for the work</i>			
Location of Works.....			
Plant Identification.....			
Description/Nature of Works.....			
.....			
Service Section/Contractor.....		Contact No.....	
Competent person Craftsman/Contractor <i>Delete as required</i>			
The location above has been examined and the precautions section (below) completed			
Name.....	Sig.....	Date.....	Position.....
THIS PERMIT DOES NOT AUTHORISE ANY REMOVAL OR INTERFERENCE WITH ASBESTOS CONTAINING MATERIALS. A SEPARATE PERMIT IS REQUIRED FOR WORK WITH ASBESTOS CONTAINING MATERIALS, eg. insulation, coatings, lightweight board or dense materials. These will generally be identified by label in the area.			
Part 2 Precaution section to be completed by the Authorised person		<i>Delete as required</i>	
Review the Generic risk assessments in the light of this task prior to work commencing (Risk Register)			
1. Can this job be done without disturbing the hazardous fibres?		YES/ NO	
2. If YES use correct facemask and PPE, review the need for airlock procedures.			
3. If NO, Special procedures are necessary see Safe systems of work Module 4(x).			
4. Is a confined space, hot work or other permit required?		YES/ NO	
5. Is person competent in using the PPE and 'Safe system of work'		YES/ NO	
After Task			
6. Review procedures and risk assessments used.			
Part 4 Declaration	Initial Procedure Written	Date/time	Name/Signature
The permit is issued subject to the listed conditions and requirements. We understand and accept the requirements and responsibilities of the permit. A final check will be made before the commencement of work.	Authorising officer		
	Craftsman		
Extension of time. A formal handover of this permit has been given. Rechecks made and the plant is safe.	Authorising officer		
Completion. The work area and all adjacent areas to which sparks and heat may have spread, have been inspected and found to be free of fire following completion of work.	Authorising officer		
	Craftsman		
Hand back, cancellation, inspection & recommissioning. I confirm that the work has been partly/completed <i>Delete</i> Checked by myself and the area left clean and safe	Authorising officer		

18 APPENDIX H– GUIDANCE

Permit to Work – Guidance

CONTROL

A permit to work procedure is a formal written system used to control certain types of work, which are potentially hazardous. The term "Permit to Work" refers to the pro-forma or certificate, which forms a part of an overall safe working system.

The essential features of a Permit to Work are:

1. Clear definition of who may authorise particular work.
2. Clear identification of who is responsible for specifying the necessary precautions to be taken.
3. Effective instruction and training to all personnel in the issue and use of permits.
4. Performance monitoring in order to ensure that the safe system is implemented as intended.

The permit is therefore a written document that gives authorisation to certain people to carry out specific work within certain time constraints and which sets out the main precautions needed to complete the work safely and without any risks to health to those people who are involved.

The mere issue of a Permit to Work does **NOT**

- (i) Simply give permission to carry out dangerous work or
- (ii) In itself make a job safe.

RESPONSIBLE PERSON

For the purpose of this Permit to Work, the Responsible Person is deemed to be a member of the Estates or Projects Department who is appropriately conversant with the current Asbestos Survey Report and any accompanying documentation. The Responsible Person should check the exact work areas affected against the Asbestos Survey Report. If asbestos containing materials are likely to be disturbed the Director of Estates should be informed.

ASSESSMENTS OF RISK

The purpose of a Permit to Work System is to ensure that proper consideration is given to the risks of particular work and these are assessed and controlled before work starts.

OBJECTIVES

The primary objectives of the procedure are to:
Ensure proper authorisation of designated work.

UNDERSTANDING

Management and Supervisors must ensure that persons involved in such work fully understand the exact:

- i) Identity, nature and extent of the job.
- ii) The hazard involved.
- iii) The precautions to be taken.
- iv) Limitations as to the extent of the work and of the time during which the work may be carried out.

LINE MANAGEMENT

It is important to ensure that the manager in direct charge of an area, location, unit, plant, installation or equipment is fully aware of all the work being done. A system of control must be provided. Provision must be made for a record showing that the nature of the work and the necessary precautions have been checked by the appropriate persons. Line management should also provide a formal hand-back procedure to ensure that the part of the plant, installation or equipment affected by the work is in a safe condition before operations/works are resumed to normal.

INDIVIDUAL RESPONSIBILITIES

Clear information, instruction, training and guidance should be given to all who have responsibilities under Permit to Work procedures including:

- i) Management.
- ii) Supervisor.
- iii) Other employees or non-management and supervisory staff
- iv) Contractors and sub-contractors

CIRCUMSTANCES IN WHICH PERMIT MUST BE USED

These include potentially hazardous work for which Permits to Work are normally required e.g.:

- | | | | | | |
|---------------------|------------------|-------------------|-------------------|----------------|-----------------|
| i) Re-construction. | ii) Dismantling. | iii) Adaptation. | iv) Modification. | v) Cleaning. | |
| vi) Maintenance. | vii) Repairs. | viii) Inspection. | ix) Testing. | x) Alteration. | x) Construction |

This permit need only be issued where the Responsible Person is aware of the presence of asbestos in the proposed work area and/or if the nature of the work may in foreseeable way lead to disturbance of asbestos in this or any adjoining areas.

19 APPENDIX I– LEGISLATION

Legislation

A number of existing Regulations and Approved Codes of Practice (ACOPs) apply to Asbestos, and further Regulations, which consolidate and strengthen the existing Regulations, came into force in 2006.

These, and all other Health and Safety Legislation – the Health and Safety at Work Etc Act 1974 – which, in general terms, requires employers to ensure the health, safety and welfare of their employees and anyone not employed by them, but whom might be affected by the work, including work processes and workplaces etc – the self-employed have similar duties (to themselves, and others affected by their work).

The Management of Health and Safety at Work Regulations 1999 require, amongst other things, that employers undertake suitable and sufficient risk assessments, to identify risks to health and safety, and to use preventive measures that eliminate or control the risks to an acceptable level. The Regulations also require employers to integrate the management of health and safety into their normal management processes.

Part of the role of the 1974 Act and the 1999 Management Regulations is to cover any health and safety issues, which are dealt with in any other, more specific, regulations, etc. therefore, the Royal Free Trust currently already has a duty to properly manage Asbestos-related risk, using the existing Regulations and well developed good practice and guidance.

Please Note That The List That Followed Is Not Exhaustive.

Regulations

Control of Asbestos Regulations 2006
Control of Substances Hazardous to Health Regulations 2002
Health and Safety at Work etc Act 1974
The Management of Health and Safety at Work Regulations 1999
The Hazardous Waste Regulations 2006
The Construction (Design & Management) Regulations 2007
The Carriage of Dangerous Goods by Road Regulations 2006
The Carriage of Dangerous Goods by Rail Regulations 1996
The Personal Protective Equipment at Work Regulations 1992
The Workplace (Health, Safety and Welfare) Regulations 1992

HSC Approved Code of Practice

L127	Regulation 4 of Control of Asbestos Regulations 2006
L143	Control of Asbestos Regulations 2006
E167	The Problems of Asbestos Removal at High Temperatures
E171	Working with Asbestos Cement and Asbestos Insulating Board
HSG 210	Asbestos Essentials-Task Manual
HSG 247	Asbestos – The Licensed Contractors Guide
HSG 248	Asbestos – The Analyst's Guide for Sampling, Analysis and Clearance
HSG 227	Comprehensive Guide to Managing Asbestos in Premises

HSE MDHS Series

MDHS 100 Surveying and Sampling Asbestos Containing Material

Other Publications

Short Guide to Managing Asbestos Materials in Premises IND (S) 223 (Rev 3), Health and Safety Executive
Working with Asbestos in Buildings IND (S) 269, Health and Safety Executive
Guidance Notes and TICA Guidance Notes