Asbestos Policy

Policy information

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Summary of document:
This policy contains the protocol for appropriate management of Asbestos Containing Materials (ACMs) for the Hywel Dda University Health Board.

Scope:
The duty of care covers employees, visitors, patients and any individual that may enter a building for whatever reason. In addition to its statutory duties a number of codes of practice are established to maintain a high standard of health and safety.

To be read in conjunction with:
010 - Health and Safety Policy – opens in a new tab
144 - Operational Maintenance Policy – opens in a new tab
156 - Risk Management Strategy & Policy – opens in a new tab
242 - Fire Safety Policy – opens in a new tab
258 - Waste Management Policy – opens in a new tab
382 - Estates Ventilation Policy– opens in a new tab
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565 - Decontamination Policy – opens in a new tab
608 - Risk Management Framework – opens in a new tab
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703 - Control of Substances Hazardous to Health (COSHH) Policy – opens in a new tab
830 - RIDDOR Reporting Decision Flowchart – opens in a new tab
982 - Incident, Near Miss, and Hazard reporting – opens in a new tab

Owning group:
Compliance and Operations Group

03/02/2023

Executive Director Job title:
Director of Operations

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1 New Policy
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4 Reviewed minor changes 28.5.2019
5 Reviewed minor changes 6.3.2023

Keywords:
Asbestos, ACMs, Control of Contractors, Maintenance, Fabric, Refurbishment

Glossary of terms
ACM – Asbestos-containing material
CFR – Certificate for reoccupation
HSE – Health and Safety Executive
LARC – Licensed asbestos removal contractor
NLW – Non-licensed (asbestos) work
NNLW – Notifiable non-licensed (asbestos) work
R&D – Refurbishment and demolition (survey)

Contents

Introduction

Asbestos-containing materials (ACMs) were widely used by the construction industry throughout the UK up until 1999. When ACMs are disturbed or damaged, asbestos fibres are released into the air which when inhaled, can cause serious and fatal diseases.

Hywel Dda University Health Board (HDdUHB) recognises its statutory duty to effectively manage the presence of ACMs within its premises, and to protect its employees, patients and others who may be affected by its operations from unnecessary exposure to asbestos, under the Health and Safety at Work etc. Act 1974 (HASWA) and under the Control of Asbestos Regulations (CAR) 2012.

Scope

This policy is applicable to all HDdUHB staff, including Independent Members, volunteers, those seconded into the Organisation or holding honorary contracts, locums and students, in addition to visitors, patients and any individual that may enter HDdUHB premises for whatever reason.

It is also applicable to contractors working within HDdUHB premises.

Aim

This policy aims to protect employees and others, so far as is reasonably practicable, from the risks posed by the presence of ACMs within HDdUHB premises.

This policy is deemed to be an extension to the Risk Health and Safety Environmental Protection Strategy and has been drawn up with an aim to provide advice to service managers and other persons with responsibility for occupying buildings, repairs and maintenance.

This policy must be read in conjunction with the Asbestos Management Plans for each site, which shows where ACMs are located and how they will be managed.

HDdUHB have commissioned specialist UKAS accredited consultants to undertake surveys to establish where and what type of asbestos is present in all properties in their portfolio. These surveys and the associated risk assessments of each ACM set out the guidance and procedures for the continued safe management of asbestos within the HDdUHB.

Objectives

The aim of this document will be achieved by the following objectives:

- Taking reasonable steps to determine the location of materials likely to contain asbestos within Health Board premises.
- Presuming materials contain asbestos unless there is strong evidence to the contrary.
- Making a written record of the location and condition of confirmed or presumed ACMs, and keeping the record up to date.

- Monitoring the condition of confirmed or presumed ACMs.
- Assessing the risks of exposure from the confirmed or presumed ACMs.
- Preparing a plan that sets out how the risks are to be managed.
- Taking the necessary steps to put the plan into action.
- Reviewing and monitoring the plan.
- Providing information on the location, condition and risks associated with exposure to the material to anyone liable to work on or disturb ACMs.
- Providing Asbestos Awareness training to all employees whose work could foreseeably expose them to asbestos.

Asbestos – general information

What is asbestos?

Asbestos is the name given to a group of fibrous minerals, composed chiefly of silicates, which occur naturally in many parts of the world. Six types of asbestos have been commercially exploited.

- Crocidolite (commonly referred to as blue asbestos)
- Amosite (the trade name for Grunerite asbestos; commonly referred to as brown asbestos)
- Chrysotile (commonly referred to as white asbestos)
- Fibrous Tremolite
- Fibrous Anthophylite
- Fibrous Actinolite

Asbestos is extremely durable and stable, with a high resistance to heat. Some forms also have resistance to acids and alkalis. Because of its fibrous nature, asbestos can be spun and woven into yarns and fabrics and used to reinforce cement and plastics.

What are the risks to health?

Asbestos splits longitudinally into very small fibrous dust particles (fibres) which can be breathed in. Although many of these will be expelled, some may lodge in the deeper parts of the lungs. Because they do not readily dissolve, they may persist for many years and can work their way through to the outer surface of the lung. Inhaling high levels of asbestos fibres over a period of time can eventually lead to diseases for which there is no cure. There are four main diseases caused by asbestos:

- Mesothelioma (which is always fatal),
- Lung cancer (almost always fatal),
- Asbestosis (not always fatal, but it can be very debilitating) and
- Diffuse pleural thickening (not fatal).

The risk of developing an asbestos related disease depends on a number of factors including individual susceptibility, the cumulative dosage received, the time since first exposure and the type and size of asbestos fibres concerned. There is usually a long delay between first exposure to asbestos fibres and diagnosis of disease, ranging from 15 to as many as 60 years. Current UK regulations are such that those now working with asbestos are unlikely to develop asbestos-related diseases provided that they

observe the required precautions.

Who is at risk?

Asbestos fibres are present everywhere in the air at very low levels. This means that everyone is breathing in a very low level of fibres all the time. Higher fibre levels may occur in buildings containing asbestos, especially if the asbestos materials are damaged. However, the risks posed by exposure to such levels are considered to be very small indeed. Moreover, an isolated accidental exposure to asbestos dust of short duration is extremely unlikely to result in the development of an asbestos-related disease.

Asbestos will generally only pose a risk to health if the normal ambient level of fibres is increased by the release of additional fibres into the air. Such releases can occur through deterioration or disturbance of asbestos containing materials - resulting in the formation of very fine particles which are often invisible to the naked eye. The more asbestos fibres inhaled the greater the risk to health.

With many buildings still containing asbestos it follows that electricians, plumbers, building maintenance workers and carpenters may still be at risk when they carry out refurbishment, repairs or maintenance work on buildings which contain asbestos. Other workers, not normally associated with the building trade, may also routinely disturb asbestos. For instance, computer installers, cabling installers, fire alarm installers, window blind fitters, or telecommunication engineers could also be at risk.

Health and safety legislation requires the risk of exposure to non-ambient asbestos fibres to be either prevented, or where this is not practicable, to be reduced to the lowest level practicable.

Likely asbestos locations

Asbestos was known to have been used within approximately 4000 products and building materials. Common materials and uses are:

- Sprayed coatings, and loose asbestos fill (thermal and acoustic insulation).
- Laggings (thermal insulation of pipes, boilers and the like).
- Insulating boards, insulating blocks and composite products (fire protection, thermal and acoustic insulation) and ceiling tiles.
- Ropes and yarns (lagging, jointing and packing materials, heat-resistant gaskets and seals).
- Cloths (jointing and packing, gaskets, thermal insulation and lagging, including fire-resistant blankets, mattresses and protective curtains, gloves, aprons, overalls etc.).
- Millboard, paper and paper products (general heat insulation and fire protection, electrical and heat insulation of electrical equipment, roofing felt and damp-proof courses, steel composite wall cladding and roofing, vinyl flooring, facing to combustible boards, flame-resistant laminate and corrugated pipe insulation).
- Asbestos cement products (profiled sheets for roofing, wall cladding weather boarding; compressed flat sheet and partition board for house and farm building partitions, shuttering in industrial buildings, decorative panels, bath panels, soffits, linings to wall and ceilings, portable buildings, fire surrounds and composite fire protection panels).
- Asbestos bitumen products (roofing felts, damp-proof courses, semi-rigid roofing, gutter linings and flashings, and coatings on metals).

- Flooring materials (floor tiles and backing for PVC flooring).
- Textured coatings and paints (coatings on walls and ceilings e.g. Artex).
- Mastics, sealants, putties and adhesives (used in these materials to prevent cracking and crazing and to improve covering power).
- Asbestos-reinforced PVC and plastics (PVC panels and cladding, and reinforcement for domestic goods).

Also formerly used for heat insulation in, or as components for, a wide variety of domestic appliances.

- Hairdryers, fan and radiant electric heaters, toasters, washing machines, tumble dryers, spin dryers, dish washers, refrigerators and freezers; cookers, simmering mats, iron stands; oven gloves, fire blankets; catalytic gas heaters, gas warm air heaters; boilers and pipe-work; electric warm air and storage heaters; radiators; heated cabinets.

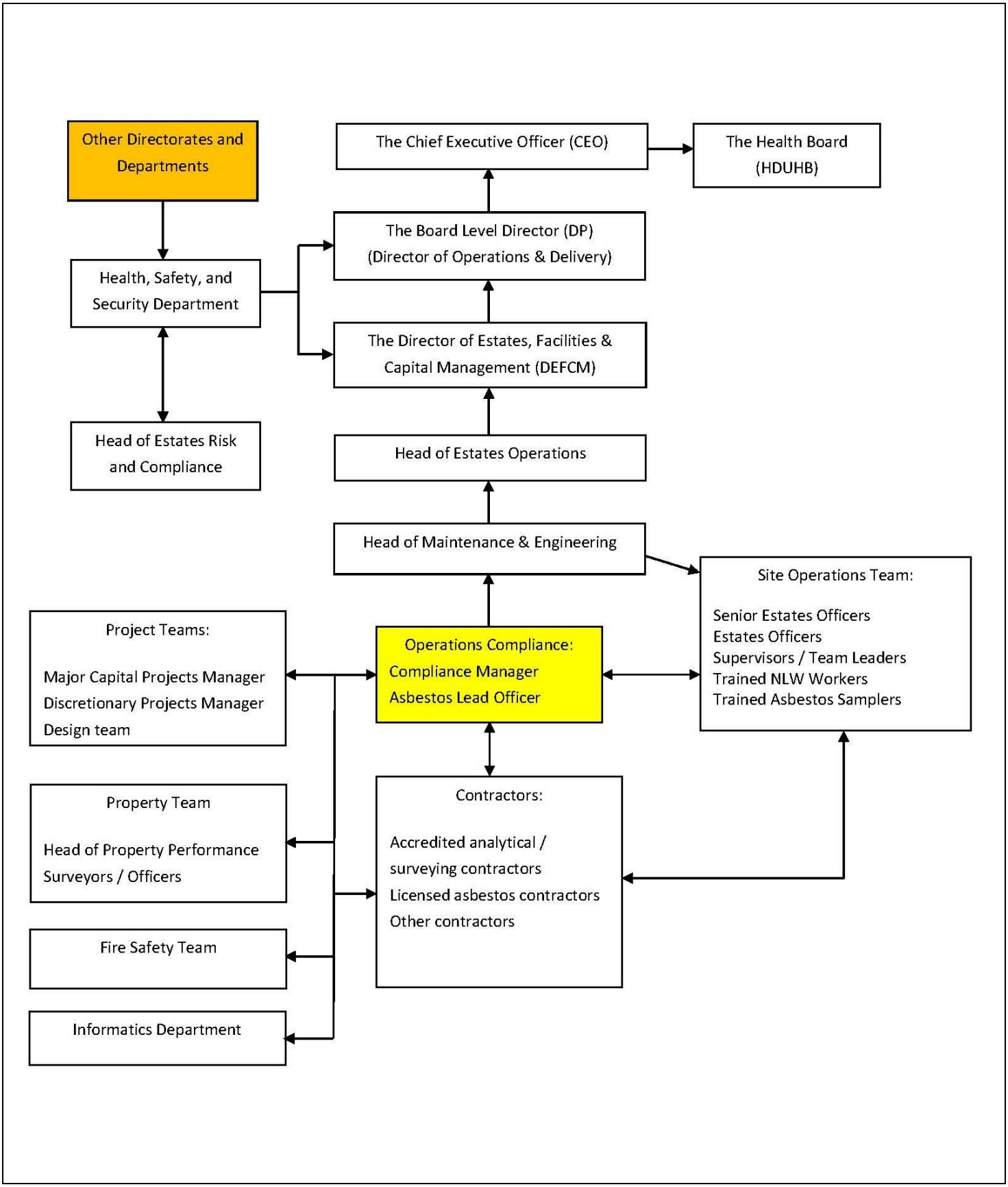
Some materials are more vulnerable to damage and more likely to give off dust than others (i.e. friable). In general, materials which contain a high level of asbestos are more easily damaged.

Asbestos insulation and lagging can contain up to 85% asbestos and it is the material most likely to give off dust, although careless work with asbestos insulating board can result in equally high fibre release. On the other hand asbestos cement contains only 10 – 15% asbestos. The fibres are tightly bound into the cement and the material will only give off dust if it is damaged or broken.

Management of asbestos

Management structure

Clear lines of managerial responsibility must be in place so that no doubt exists as to who is responsible for the management of asbestos within Hywel Dda University Health Board. The hierarchy below depicts and summarises the key appointments. Communications between all parties involved must be considered to ensure that each key member of staff is fully aware of their involvement and responsibilities.


Other Directorates and Departments
The Chief Executive Officer (CEO)
The Health Board (HDUHB)
The Board Level Director (DP) (Director of Operations & Delivery)
Health, Safety, and Security Department
The Director of Estates, Facilities & Capital Management (DEFCM)
Head of Estates Risk and Compliance
Head of Estates Operations
Head of Maintenance & Engineering
Site Operations Team:
Senior Estates Officers
Estates Officers
Supervisors / Team Leaders
Trained NLW Workers
Trained Asbestos Samplers
Project Teams:
Major Capital Projects Manager
Discretionary Projects Manager
Design team
Operations Compliance:
Compliance Manager
Asbestos Lead Officer
Property Team
Head of Property Performance
Surveyors / Officers
Contractors:
Accredited analytical / surveying contractors
Licensed asbestos contractors
Other contractors
Fire Safety Team
Informatics Department

Asbestos Surveys

All HDdUHB freehold premises have been subject to asbestos Management surveying in accordance with Health and Safety Executive (HSE) guidance HSG264 (or former Type 2 asbestos surveying in accordance with HSE guidance MDHS100) by UKAS accredited asbestos analytical consultancies, in order to identify any suspected asbestos containing materials (ACMs). Leasehold premises may also be subject to Management surveying if the tenancy agreement indicates that HDdUHB is the duty holder under CAR 2012 Regulation 4, or if the Operations Compliance Asbestos Lead Officer deems existing information / arrangements to be insufficient.

Management surveying involves the inspection of visible / accessible building materials and items, and where required, the sampling and analysis of materials suspected of containing asbestos. The procedures for sampling have been designed to reduce any risks and can be safely carried out in occupied premises. Management surveying only covers visible suspect material and will not identify ACMs that are concealed within the construction of the fabric of a building.

The condition of the sampled ACMs is assessed at the time of the survey via a material assessment. This, coupled with a priority assessment, forms the basis of the risk algorithm which allows HDdUHB to establish the overall risk posed by each ACM.

Should any refurbishment or improvement works involving demolitions or alterations to the fabric of a building be proposed, then a further 'intrusive' survey called a Refurbishment and Demolition (R&D) asbestos survey may be required in order that the contractor carrying out the works can allow for the necessary safe working provisions. Intrusive R&D asbestos surveys must be undertaken by UKAS accredited asbestos consultancies and may involve destructive inspection to gain access to all affected areas including those normally inaccessible or difficult to reach (which may require complete segregation from staff and general public, etc.).

All future survey work (if required) should be thorough and include all parts of the premises, including warehouses, yards, sheds, outbuildings, underfloor services, ducts, corridors, vertical risers, ceiling voids, storerooms, external runs of pipes and bridges; an asbestos survey may be required of the ground where ground works are proposed. Fixed plant and machinery, such as process plant, should be included, as well as mobile units which are permanently on the premises.

If additional sampling is required, this can be undertaken via external UKAS accredited contractors or by utilising the suitably trained operatives based in the regional acute sites or a BOHS P402 trained Operations Compliance Officer. Previously un-accessed areas are identified and inspected during the annual re-inspection programme where practicable.

Asbestos registers, database systems and management plans

The Master Asbestos Register and site plans:
The findings of the original asbestos Management / Type 2 surveys and subsequent R&D surveys and additional sampling, along with the individual risk assessments and locations of each ACM, have been collated within an MS Access database referred to as the Master Asbestos Register, as managed by the Operations Compliance Asbestos Lead Officer.
The location of ACMs is also marked on a series of site plans made available in PDF format, as managed by the Operations Compliance Asbestos Lead Officer.

Asbestos Management Plans (AMP):
For each site, an Asbestos Management Plan (AMP) document has been compiled which includes the site-relevant data extracted from the Master Asbestos Register, and the relevant site plans. The AMPs and their content are managed by the Operations Compliance Asbestos Lead Officer. In addition to the asbestos register data, the AMP includes details of the person(s) responsible for managing the asbestos risk, instructions that any work on the fabric of the building cannot start without the relevant parts of the register being checked and other necessary checks, procedures and arrangements. The AMP also details plans for any necessary work identified from the risk assessment, e.g. repair, protect or remove ACMs, the schedule for monitoring the condition of any ACMs, how to communicate the content of the AMP and contingency arrangements if the main contact person for asbestos risk management is not available.

Printed hard-copy versions of AMP documents for the acute sites are issued to the Estates Manager for the relevant site (the default designated responsible person at the acute site). Printed hard-copy versions for community sites are also issued to the Estates Manager for the relevant acute, in addition to being issued to the designated responsible person (DRP) at the relevant community site.

The AMPs must be made available by the designated responsible person (DRP) for that site. The DRP must be aware of the importance of this document and its content and make its whereabouts known to others on site for reference purposes. It is imperative that the document is shown to any contractors prior to the commencement of their work. A log of the DRPs for the community sites is kept is managed by Operations Compliance Asbestos Lead Officer which shows the dates that the registers were delivered to the relevant sites and to whom.

PDF copies of each AMP document are stored on the HDdUHB Estates Department F-drive to facilitate remote access and electronic distribution.

It is the responsibility of the Operations Compliance Asbestos Lead Officer to collate and issue the printed hard-copy versions of AMP documents, and to curate the PDF versions on the F-drive.

HDdUHB is utilising an asbestos re-inspection consultant during 2023 to import the Master Asbestos Register data into a proprietary asbestos database system to generate Asbestos Re-inspection Survey Reports (to be included within AMP documents), and to allow web-based portal access to the Master Asbestos Register data, This is to replace the Estates Department Asbestos Viewer system which was formally used to remotely view data. Following a suitable review period, it is the intention of the Estates Compliance Team to procure this system or a similar system to achieve this function.

Any changes to the status of any ACM’s recorded in the register must be reported to the Operations Compliance Asbestos Lead Officer so that the database and relevant AMP document can be updated and revisions issued as necessary. Changes to status would include any damage, full or partial removal, covering with another material (plywood for example) or encapsulating (sealing with a coating based on paint, polymer, bitumen or cement). Staff can also see the HDdUHB intranet site for information on how to report any damage or defects under the Estates and Maintenance section of Staff Utilities.
Periodic updates to the asbestos registers will be undertaken by Operations Compliance Asbestos Lead Officer as and when required. The AMPs shall be reviewed and up-dated on an annual basis

following ACM re-inspections, effectiveness review or if there are major changes to the current asbestos legislation, HSE Approved Codes of Practice(s) or guidance.

Asbestos Remedial Works

Where significant risks to health and safety arise due to the presence of ACMs then, in accordance with the stated policy, the ACMs will be "removed or treated as appropriate to eliminate the risk or reduce it to an acceptable level under an immediate and continuing programme". The information contained within the Master Asbestos Register will be used to determine the priority and order in which the remedial works are undertaken. The Estates Department will then make the necessary arrangements in consultation with the relevant Estates Manager. Every job will be subject to a plan of work and risk assessment, which will detail risk control measures including the identification of suitable personal protective equipment (PPE), respiratory protective equipment (RPE) and the necessary control measures.

Monitoring Condition of Asbestos

The Health & Safety Executive advises that where ACMs are in good condition and not likely to be damaged or worked on then it is best to leave them in place. In such circumstances the condition of the materials will be monitored by trained in-house staff or selected external analytical consultants at specific intervals dependent upon the use of the building, the location of the material and the risk assessment. Periodic inspections will be undertaken at all sites within the HDdUHB property portfolio, the frequency of which will be determined on a site-by-site basis dependent on the risks presented. The effectiveness of the AMP will be reviewed after every 12 months, following each premises re-inspection, following a review of effectiveness, after any change in the legislation, or work practices etc.

Between these periodic inspections the relevant Estates Manager will be required to regularly check, as far as reasonably practicable, for any damage to ACMs and when necessary, comply with the instructions set out below under 'Safety Advice'. Any damage should be reported to the appropriate help desk on the relevant telephone number(s) as shown in the safety advice section.

The Asbestos Management Plan documents for each site contain guidance on the necessary frequency of checks in respect of the various types of asbestos present. No special training is required in respect of these checks since they merely comprise of visual inspections to determine any obvious damage. However, if the individual carrying out the inspection is adjusting the current risk rating of the ACM in the register, then they must be fully aware of the principles of the risk algorithms.

Planning Work

Any work which is likely to cause disturbance to ACMs, however minor in nature, must be suitably assessed for the risk from asbestos exposure. Consideration should first be given to designing the work so that the ACM(s) are not disturbed thus eliminating any asbestos risk.

If this is not possible, then consideration must be given to the requirements of CAR 2012, and the work conducted as non-licensed (or notifiable non-licensed) asbestos work by trained personnel / contractor, or as licensed asbestos work by a licensed asbestos removal contractor Duty holders may refer to the

Operations Compliance Asbestos Lead Officer for assistance in the assessment of risk and in determining the most appropriate course of action.

Where maintenance, installation, or construction work or any other work which may disturb the fabric of the building is proposed within the vicinity of ACMs then the work must be suitably risk assessed and suitable control actions taken to eliminate or mitigate any asbestos risk to an acceptable level. The risk assessment and control actions must be recorded within a written 'Plan of Work' document (or Method Statement).

Engaging managers must not allow any works to proceed until they are satisfied that an adequate assessment of potential risks has been completed and that safe systems of working have been established. A copy of the risk assessment and plan of work must be retained on file.

All contractors working within HDdUHB premises must have received appropriate asbestos awareness training in compliance with CAR 2012 regulation 10 prior to commencing work.

If there is ANY uncertainty regarding the scope of the work and the adequacy of the contractor's risk assessment or plan of work, then technical advice should be sought via the Maintenance Help Desk :–

Bronglais Hospital	Help Desk 01970 623131 ext 5770
Prince Philip Hospital	Help Desk 01554 756567 ext 3689
Glangwili Hospital	Help Desk 01267 235151 ext 2942
Withybush Hospital	Help Desk 01437 764545 ext 3463

Licensed asbestos work

Under the requirements of CAR 2012, higher-risk work with ACMs can be conducted only by specialist contractors who are in possession of a current HSE licence for work with asbestos insulation, asbestos coating and asbestos insulating board. Such contractors are referred to as Licensed Asbestos Removal Contractors (LARCs), and the higher-risk work is referred to as licensed work.

Licensed work, as defined within CAR 2012 regulation 3, refers to most work involving asbestos insulation, asbestos coatings, and asbestos insulating board, but also with any ACMs where the Control Limit for asbestos exposure may be exceeded. CAR 2012 requires the LARC to produce a detailed site-specific risk assessment and plan of work document, to normally submit a formal notification of the start and nature of the work to the enforcing authority at least 14 days in advance of the work, and to utilise specialist control measures such as the erection of air tight enclosures, negative pressure equipment, and asbestos-decontamination facilities.

The LARC's licence must be valid for the whole of the period when the work is carried out.

All licensed asbestos work must be subject to an independent clearance test by a UKAS-accredited air testing laboratory / consultancy in compliance with HSE guidance HSG 248 second edition. A valid Certificate For Reoccupation (CFR) must be received by HDdUHB before the work area can be reoccupied.

In extreme cases such as conducting emergency repairs on services concealed behind asbestos panels, it may be necessary to apply to the enforcing authority (normally the HSE) for a waiver of the 14-day notification period. It should be noted that waiver requests should occur infrequently and generally result from accidents or dangerous occurrences which require urgent remedial action to be undertaken that could not be anticipated or foreseen. Such urgent works may only commence once the HSE has formally granted the waiver of the notification period in writing. It is normally the LARC's responsibility to submit a waiver request on behalf of the client (normally HDdUHB), although waiver requests must be sent with a written confirmation or evidence to support the waiver request, usually from the Engaging Manager.

Duty holders may refer to the Operations Compliance Asbestos Lead Officer for guidance in determining whether work requires an asbestos licence, the most appropriate course of action, and the selection of suitable LARCs and UKAS-accredited air testing laboratories / consultancies.

Non-licensed asbestos work (NLW)

Lower-risk asbestos work is referred to as *non-licensed asbestos work* (NLW) and includes most work on "bonded" asbestos-containing materials such as cement, plastic, vinyl, bitumen, and decorative textured coatings (e.g. Artex). Additionally, some strictly controlled minor work with asbestos insulating board may be regarded as non-licensed work if it conforms to the exception conditions detailed in CAR 2012 regulation 3(2).

Non-licensed asbestos work can be conducted by authorised Estates personnel or contractors without an HSE licence, on the condition that the work is conducted in compliance with the applicable parts of CAR 2012 (including the provision of a suitable risk assessment and plan of work) and with this policy, and that workers have received training for this type of work in accordance with CAR 2012 regulation 10 and within 12 months of the work.

Non-licensed asbestos work does not require formal notification to the enforcing authority, and does not normally require a clearance test, although air testing is beneficial in some circumstances.

A number of maintenance personnel at each acute site have been trained to non-licensed asbestos work. This allows low-risk ACMs to be remediated in-house. This is mainly the removal of floor tiles and gaskets, but can include other ACMs such as asbestos cement, asbestos ropes and textiles, bitumen and friction products etc. The supervisor or manager of the work party shall keep written records at the applicable acute site of all instances of non-licensed asbestos work, including the location of the works, the names of the operatives involved, duration of exposure and the type of RPE used.

Certain types of non-licensed asbestos work will not meet the CAR 2012 exemption conditions set out in regulation 3(2) (a), (b) and (c). This type of work is referred to as *notifiable* non-licensed asbestos work (NNLW), and necessitates additional requirements over and above those for non-licensed asbestos work. It is HDdUHB policy to employ licenced asbestos contractors to conduct notifiable non-licensable work except in exceptional circumstances.

Duty holders may refer to the Operations Compliance Asbestos Lead Officer for guidance in determining the type of asbestos work, how best to manage it, and air testing requirements.

Disposal of Waste

All asbestos waste, irrespective of type, whether it includes small amounts of waste or large scale removal, is subject to the Hazardous Waste Regulations (England and Wales 2005) and can only be disposed of at special sites licensed to receive it.

In addition, all asbestos waste other than asbestos bonded products (such as asbestos cement sheets) must be double bagged in heavy duty (1000 gauge) polythene bags (a red inner bag within a clear outer bag) and clearly labelled with the prescribed asbestos label before it is transported to the disposal site. These bags are available from the Estates Department workshops.

A lockable asbestos waste container is available at the Estates Department of each of the acute sites (with the exception of Prince Philip Hospital) for temporary storage of asbestos waste prior to collection by a licensed waste carrier.

Safety Advice

Advice on safety in respect of asbestos related issues can be obtained from a number of sources as follows:

The Health, Safety and Security Department can give advice on asbestos, risk assessments, method statements and respiratory protection equipment (RPE):

- Head of Health, Safety and Security – 01437 773771
- Health and Safety Manager – 01267 227334

Occupational Health can also give advice, health surveillance, etc. at the following sites:

- Bronglais Hospital Occ. Health 01970 635811
- Prince Philip Hospital Occ. Health 01554 783518
- Glangwili Hospital Occ. Health 01267 227429
- Withybush Hospital Occ. Health 01437 773215

For advice on, or assistance with, risk assessments and plans of work etc, telephone the estates department at:

- Bronglais Hospital Help Desk 01970 623131 ext 5770
- Prince Philip Hospital Help Desk 01554 783689 ext 3689
- Glangwili Hospital Help Desk 01267 235151 ext 2942
- Withybush Hospital Help Desk 01437 764545 ext 3463

For advice regarding asbestos surveys, sampling / analysis / air testing results, and asbestos management plan or register content, or for further explanation / clarification on the content of this Policy, please telephone the Operations Compliance Asbestos Lead Officer on 07825 964661.

Incident Response

Damage to any materials known to contain asbestos or suspected to contain asbestos should be reported immediately via the appropriate Maintenance Help Desks. The Estates Department will ensure that effective remedial works are arranged if required or provide assurance that there is no asbestos present following the necessary checks.

Where damage is likely to give rise to airborne respirable fibres then the vicinity of the damaged ACM is potentially at risk of contamination and should be evacuated and sealed off until remedial works are completed. Warning notices stating “No Unauthorised Entry” should be displayed.

Materials that are “bonded” and have a lower fibre content, e.g. asbestos cement, are less likely to release fibres than those that are soft and have a higher fibre content, e.g. sprayed coatings and lagging, and which are more easily damaged.

The HSE has approved guidance on the measurement of airborne fibres. The approved method of measuring airborne fibres is susceptible to measuring all respirable fibres including asbestos fibres. Therefore the ambient fibre level within any building is dependent on all fibre sources. Airborne fibre concentrations less than 0.010 fibres per cm^3 of air are usual, but elevated levels can easily occur due to the presence of carpets, upholstery and clothing etc. Remedial action should be considered if level exceeds 0.010 fibres per cm^3 of air.

Air testing for asbestos must be performed by laboratories conforming to ISO17025 via UKAS accreditation. After licensed asbestos work, a Certificate For Reoccupation (usually including clearance air testing) must be issued prior to reoccupation by a laboratory conforming to ISO 17020 and ISO 17025 via UKAS accreditation.

Emergency procedures for workers

Asbestos Awareness training shall include emergency procedures for workers in the event of an unplanned release of asbestos fibres, as detailed below.

- If an unknown ACM is uncovered but has not been significantly disturbed, workers shall

    1. Stop work.
    2. Isolate the area.
    3. Report incident to their Manager.
    4. Put up warning signs “Do Not Enter - Possible Asbestos Contamination”.
    5. Have the material sampled by a competent person for analysis.
    6. On receipt of result decide on course of action.
    7. If the material contains asbestos, apply the appropriate controls, using a licensed contractor if required and inform the Operations Compliance Asbestos Lead Officer.

- If the ACM has been disturbed and there is visible dust or debris on the workers' clothing, workers shall follow the procedure most appropriate to the situation.

    - Situation # 1 - If there is only a small amount of dust or debris seen, e.g. a little dust on sleeve or shoes:

1. Wipe down clothing and footwear with damp rags wet wipes.
2. Bag and dispose of rags wipes as asbestos waste.
3. Report the incident to their Manager.
4. Decide if work requires a licensed contractor.
5. Inform the Operations Compliance Asbestos Lead Officer of the incident.
6. Keep a record of the incident.

    - Situation #2 - If there is a large amount of dust or debris seen, e.g. contaminated clothes, hair, footwear

1. Stay put, but move away from the source.
2. Call for help. Ask helper to bring RPE and coveralls.
3. All put on RPE.
4. Helper put on coveralls.
5. Wipe down hair / head and any other exposed skin with damp wipes / wet wipes until visually clean. Helper to assist if required.
6. Wipe down clothing and footwear with damp rags damp wipes / wet wipes until visually clean, and remove outer clothing. Helper to assist if required.
7. Bag contaminated clothing and rags / wipes for disposal as asbestos waste. A judgement call will need to be made regarding footwear – remove and bag for disposal as asbestos waste if there is a risk of still being contaminated.
8. Put on coverall and decide whether to wash hair and shower.
9. Helper to remove their coverall and RPE, and bag for disposal as asbestos waste.
10. If showering, locate a suitable shower facility and bring additional coveralls. Helper to put a sign on the door prohibiting access to other persons.
11. Enter shower still wearing RPE and start lathering hair, exposed skin and coverall. Remove coverall and underwear during showering process but only when fully wetted; remove RPE last. Finish showering and bag coverall, RPE, and underwear for disposal as asbestos waste.
12. Clean shower facility with wetted rags and bag for disposal as asbestos waste.
13. If no clean clothes are available, put on clean coveralls.
14. Report the incident to their Manager.
15. Decide if work requires a licensed contractor.
16. Inform the Operations Compliance Asbestos Lead Officer of the incident.
17. Keep a record of the incident.

Compliance with RIDDOR

Exposure to asbestos is reportable under RIDDOR when a work activity causes the accidental release or escape of asbestos fibres into the air in a quantity sufficient to cause damage to the health of any person.

Such situations are likely to arise when work is carried out without suitable controls, or where those controls fail, and often involve:

- Use of power tools (to drill, cut etc) on most ACMs.
- Work that leads to physical disturbance (knocking, breaking, smashing) of an ACM that should only be handled by a licensed contractor e.g. sprayed coating, lagging, and asbestos insulating board.
- Manually cutting or drilling asbestos insulating board.
- Work involving aggressive physical disturbance of asbestos cement e.g. breaking or smashing.

If these activities are carried out without suitable controls, or the precautions fail to control exposure, these would be classed as a 'dangerous occurrence' under RIDDOR and should be reported.

The individuals affected must immediately report any incidents to their Line Manager who will be responsible for informing the appropriate persons in compliance with the HDdUHB RIDDOR Reporting Decision Flowchart.

The incident shall be reported within the Datix system by the affected person/s and further advice sought from the Risk Management Department, Health, Safety and Security Department, and Occupational Health Department.

Roles and Responsibilities

Chief Executive Officer (CEO)
The Chief Executive is responsible to the Board of HDdUHB for the implementation of the arrangements and procedures required to implement this policy and to achieve compliance with legislation in standards of health and safety. These are outlined in more detail within HDdUHB 010 – Health and Safety Policy – opens in a new tab.

The CEO is responsible for ensuring that adequate resources are in place to meet all of the statutory requirements and that appropriate policies and procedures are implemented. The following individuals listed below will have delegated responsibility to ensure this policy is adhered to.

1Board Level Director
HDdUHB must nominate a Board Level Director as Designated Person (DP) responsible to the CEO to take the lead role on all operational and estates governance issues under their control. The BLD will therefore act as DP and must conduct regular corporate meetings, which includes governance issues to update the Board accordingly.

The Director of Estates, Facilities and Capital Management (DEFCM) & The Head of Estates Operations (HoEO)
The Director of Estates, Facilities and Capital Management (DEFCM) & The Head of Estates Operations (HoEO) are accountable officers responsible within the estates department for ensuring that adequate resources and expertise is available to formulate an estates operational maintenance structure to meet the needs of this policy. This structure will deliver an effective and robust maintenance strategy for HDdUHB, in order to meet its legal responsibilities for all statutory related

issues in every respect. They must also ensure that all related issues are cascaded within the management hierarchy.

The Head of Estates Engineering (HoEE)
The HoEE is responsible for overseeing and coordinating the day to day activities of the senior estates operational management team, ensuring that there is sufficient resources and expertise in supporting and maintaining HDdUHB to satisfy the contents of this policy. The HoEE will also ensure that all related issues are cascaded within the management hierarchy.

Assistant Director of Informatics
The Assistant Director of Informatics (ADI) is the accountable officer within the informatics department. The ADI has a direct responsibility to ensure that they are fully conversant with this asbestos policy and the information contained within the relevant asbestos management plans, asbestos registers and also the 541 - Control of Contractors Policy – opens in a new tab.

It is the responsibility of the ADI to ensure that relevant staff and any external contractor appointed by the Information Technology (IT) department have received general awareness training on asbestos as a minimum requirement. This is to ensure that individuals are aware of the risks of ACMs and where they are most likely to find them. All cabling and similar work by IT and their contractors should be undertaken in conjunction with the estates department and the relevant asbestos registers must be checked prior to all works.

Estates Managers (EM)
The EM's are responsible for the implementation of this policy. They must ensure that strategically resources are made available locally so that this policy and subsequent procedures remain effective for the sites which they have management responsibilities. Regular communications between all staff is essential.

Senior Estates Officers (SEO) & Estates Officers (EO)
Senior Estates Officers and Estates Officers and deputies (including Supervisors and Team Leaders) are responsible, managerially and operationally for the effective delivery of operations at HDdUHB premises without hazard to staff, contractors, patients and members of the public. The SEOs and EOs, along with their deputies, must ensure that all work follows a safe system of work.

The SEOs and EOs are responsible for ensuring that their staff members have sufficient technical knowledge, training and experience to carry out their work. They are responsible for ensuring that their staff members who work directly with or sample asbestos are competent to do so and fully understand any dangers involved, and that all other required members of their staff have received appropriate asbestos awareness training.

The SEOs and EOs, along with their deputies, must ensure that all contractors carrying out works on site are informed of the presence of asbestos where necessary and ensure that they comply with this policy. HDUHB policies and procedures should be used as a minimum standard to be complied with.

Operations Compliance Manager (OCM) and Operations Compliance Asbestos Lead Officer
The OCM and Operations Compliance Asbestos Lead Officer are responsible for the preparation of this policy as well as the monitoring of its effectiveness. However, this will only be successful if the EM's etc. regularly communicate with the OCM. This will ensure that the OCM remains fully informed of

effectiveness of the site procedures and their implementation, so that any failings can be promptly actioned and addressed.

This may on occasions require the formal bidding for capital moneys for additional equipment and machinery.

The Operations Compliance Asbestos Lead Officer is the Deputy Appointed Person (DAP) for asbestos management, and has a strategic involvement within the Operational Management Structure to directly assist the HoEO in the completion of their function, particularly in policy formulation and the preparation of the Asbestos Management Plans and Registers.

Periodic inspections will be undertaken at all sites within the HDdUHB property portfolio, either by the Operations Compliance Asbestos Lead Officer or by an appointed contractor, the frequency of which will be determined on a site-by-site basis dependent upon risks presented. The Operations Compliance Asbestos Lead Officer also maintains a matrix of asbestos training that HDdUHB Maintenance staff have received.

Trained Internal Non-Licensed Asbestos Workers
A number of maintenance department staff members have been trained and are deemed competent to undertake non-licensed work with asbestos.

These operatives are responsible for ensuring that the work that they are undertaking falls within the parameters of work for which they have been trained. They are responsible for completing a plan of work / risk assessment prior to commencing works and for following the correct safety procedures, including leaving the work area safe for occupation.
They are also trained and deemed competent to undertake sampling of potential ACMs. The procedures that they follow can be found in of the relevant AMP. They are responsible for following the correct safety procedures i.e. utilising appropriate PPE and RPE, use of type H vacuum cleaners, damping down, using the appropriate hand tools etc. and leaving the sample area safe for occupation.

Asbestos Consultants, Surveyors and Analysts
Asbestos consultants, surveyors and analysts have responsibilities under the Health and Safety at Work etc Act 1974 (HASWA) and specific duties under CAR 2012, in addition to contractual obligations. Engaging managers must ensure that asbestos laboratories, inspection bodies, and consultancies must have appropriate UKAS accreditation to ISO 17020 and ISO17025 for the type of work being undertaken.

Licensed Asbestos Removal Contractors (LARCs)
LARCs have responsibilities under the Health and Safety at Work etc Act 1974 (HASWA) and specific duties under CAR 2012, in addition to contractual obligations. Engaging managers must ensure that licensed asbestos removal contractors hold a current and appropriate license granted by the Health and Safety Executive (HSE) for work on or with sprayed asbestos coating, asbestos thermal insulation, and asbestos insulating board

Contractors must also be members of the Asbestos Removal Contracts Association (ARCA) or Asbestos Control and Abatement Division (ACAD) of the Thermal Insulation Contractors Association (TICA).

Major Capital Team and Discretionary Projects Team
The Major Capital Team and Discretionary Projects Team have responsibilities to ensure that any work with reference to asbestos on any capital or discretionary project must be firstly routed through the HoEO. The HoEO must have first line communication with all asbestos consultants, contractors and analysts appointed by HDdUHB with reference to asbestos. This will ensure that all information given and received by contractors is maintained in a central location.

The teams have a responsibility to ensure that the presence of asbestos is considered when planning all works. They should consult all existing asbestos information and, if necessary, commission a UKAS accredited consultancy to undertake a Refurbishment and Demolition Survey prior to starting works. Where reasonably practicable, all ACMs should be safely removed from an area during a refurbishment scheme.

Contractors
The SEOs and EOs, the Major Capital Team and Discretionary Projects Team, or the manager / designated responsible person of any premises with ACMs must ensure that all contractors visiting to carry out works of any nature are informed of the presence of asbestos, shown a copy of the register and have signed to confirm that they have read and understood the register prior to being allowed to start any work. A Contractors pass/permit to work can be utilised for this purpose, details of the asbestos can be logged in the detail box on the pass.

In this context the term ‘contractors’ must be interpreted in its widest sense and will therefore also include such firms as cleaners, caterers, etc. Where a contract is entered into for these or similar services, a copy of the register must be made available. It will not then be necessary for contract staff to sign that they have read the register at the premises. It will instead be the responsibility of the contractors to properly advise their employees working at the premises. This will need to be checked and audited periodically to ensure compliance.

To align with the HDdUHB 541 – Control of Contractors Policy – opens in a new tab, all external contractors working within HDdUHB properties must have received appropriate asbestos awareness training prior to commencing work.

Head of Property Performance and Property Team Surveyors / Officers
The Head of Property Performance (HPP) and the Property Team surveyors / officers have a responsibility to ensure that the HoEO has adequate resources to complete the day-to-day management of asbestos. For example, the HoEO may request additional help as and when necessary from the Property Team surveyors / officers for updating the register information and attending site inspections.

The HPP must ensure that asbestos contained within buildings is considered when purchasing or leasing new properties. No property shall be acquired unless suitable asbestos surveys have been conducted and an up to date asbestos register is available from the vendor. Additionally, when disposing of property, all relevant information regarding asbestos shall be passed to the buyer.

Designated Responsible Persons & Individuals with Responsibility for Property
Designated Responsible Persons and other individuals with responsibility for property have a responsibility to ensure that they adhere to the content of this policy. These duties apply equally to persons or third parties who do not have a specific premises management function but nevertheless

have related responsibilities for property. For example, the organising and letting of repairs and maintenance, IT Contracts, cleaning, catering and/or servicing contracts for buildings or groups of buildings generally. Therefore, they must ensure that all contractors are informed of the presence of asbestos and advised as to the location of the relevant Asbestos Management Plan and Register(s).

Employees Duties
Under Section 7 of the HASWA, employees have a duty to take reasonable care for their own health and safety and of others who may be affected by their acts or omissions at work. Section 7 also requires the employee's co-operation with their employer to enable the employer to comply with statutory duties for health and safety.

References

The following reference sources have been used in the compilation of this Asbestos Policy:

- The Control of Asbestos Regulations 2012
- Asbestos and Man Made Mineral Fibres in Buildings, Practical Guidance. Thomas Telford DETR (1999)
- HSE ACOP L143 (2013) Managing and Working with Asbestos
- HSE Guidance HSG 264 (2010) Asbestos: The survey guide
- HSE Guidance HSG 248 (2021) Asbestos: The Analyst's Guide
- HSE Guidance HSG 247 (2006) Asbestos: The Licensed Contractor's Guide
- HSE Guidance INDG 223 (2012) Managing Asbestos in Workplace Premises
- HSE Guidance Note HSG 210 (2018) Asbestos Essentials
- HSE Guidance Note HSG 227 (2002) Comprehensive Guide to Managing Asbestos in Premises

Further information is available on the HSE website:

http://www.hse.gov.uk/asbestos/ opens in a new tab