# ASBESTOS POLICY

<table>
<thead>
<tr>
<th>Version:</th>
<th>Asbestos Policy v 1.2</th>
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<tbody>
<tr>
<td>Ratified by:</td>
<td>Policy Committee</td>
</tr>
<tr>
<td>Date ratified:</td>
<td>22nd March 2013</td>
</tr>
<tr>
<td>Approving Committee/Group (Date)</td>
<td>Health &amp; Safety, JSCC, HSEG (December 2013)</td>
</tr>
<tr>
<td>Date Approved by Medicines Management Committee:</td>
<td>N/A</td>
</tr>
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<td>(NB: All Procedural Documents which include details of drugs or their management must be approved by the Medicines Management Committee)</td>
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<tr>
<td>Name and Title of originator/author:</td>
<td>Head of Estates</td>
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<tr>
<td>Date issued:</td>
<td>April 2013</td>
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<tr>
<td>Target audience:</td>
<td>All staff and contractors</td>
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<tr>
<td>Superseded documents</td>
<td>Asbestos Policy v1.1</td>
</tr>
<tr>
<td>Relevant Standards(e.g. NHSLA, CQC, HSE)</td>
<td>HSE</td>
</tr>
<tr>
<td>Acknowledgements</td>
<td>None</td>
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<tr>
<td>Key Words</td>
<td>Asbestos, face fit, asbestos skip, occupational health, face fit records, MiCAD</td>
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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 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 Anthophylite
- 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

<table>
<thead>
<tr>
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<th></th>
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</thead>
<tbody>
<tr>
<td>Asbestos Survey/Register</td>
<td>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.</td>
</tr>
<tr>
<td>Contractor</td>
<td>A firm or person who has entered into an agreement with the Trust to carry out work for the Trust.</td>
</tr>
<tr>
<td>Contractors Handbook</td>
<td>Contractor Handbook issued at tender stage.</td>
</tr>
<tr>
<td>Contractors Agreement Document</td>
<td>Contract document, setting out the Trust health, safety and environmental and statutory requirements and standards.</td>
</tr>
<tr>
<td>Contract Controller</td>
<td>Person appointed by the Trust in the contract document to act as the Engineer and Contract Administrator.</td>
</tr>
<tr>
<td>Site Risk Manager</td>
<td>The Contractor’s responsible person for advising on health, safety and environmental matters at the premises where the work is to be</td>
</tr>
</tbody>
</table>
or is being carried out and ensuring standards are met.

<table>
<thead>
<tr>
<th>Designated Officer/Responsible Person - Asbestos</th>
<th>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.)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Asbestos Management Algorithm</td>
<td>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).</td>
</tr>
<tr>
<td>Permit to Work</td>
<td>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.</td>
</tr>
<tr>
<td>Risk Assessment and Method Statements (RAMS).</td>
<td>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.</td>
</tr>
<tr>
<td>Trust</td>
<td>Croydon Health Services NHS Trust</td>
</tr>
<tr>
<td>Premises</td>
<td>All hospital sites owned, occupied or operated by Croydon Health Services NHS Trust.</td>
</tr>
</tbody>
</table>

**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 easy 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 looks at the likelihood of someone disturbing the ACM. The three following parameter 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.

<table>
<thead>
<tr>
<th>RISK ASSESSMENT</th>
<th>INSPECTION FREQUENCY</th>
</tr>
</thead>
<tbody>
<tr>
<td>&gt;21 High</td>
<td>Once per three months or reported damaged</td>
</tr>
<tr>
<td>20– 16 Medium</td>
<td>Annually or on reported damage</td>
</tr>
<tr>
<td>15– 11 Low</td>
<td></td>
</tr>
<tr>
<td>&lt;10 Very Low</td>
<td>On maintenance works only</td>
</tr>
</tbody>
</table>

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, e.g. 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

<table>
<thead>
<tr>
<th>RISK ASSESSMENT</th>
<th>INSPECTION FREQUENCY</th>
</tr>
</thead>
<tbody>
<tr>
<td>&gt;21 High</td>
<td>Monthly or reported damaged</td>
</tr>
<tr>
<td>20– 16 Medium</td>
<td>Every 6 months or on reported damage</td>
</tr>
<tr>
<td>15– 11 Low</td>
<td></td>
</tr>
<tr>
<td>&lt;10 Very Low</td>
<td>Annually or on reported damage</td>
</tr>
</tbody>
</table>

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 of 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 publics, 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 to 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.

<table>
<thead>
<tr>
<th>Element to be monitored</th>
<th>Lead</th>
<th>Tool</th>
<th>Frequency</th>
<th>Reporting arrangements</th>
<th>Acting on recommendations and Lead(s)</th>
<th>Change in practice and lessons to be shared</th>
</tr>
</thead>
<tbody>
<tr>
<td>Appointment of Designated Officers – asbestos in writing</td>
<td>Director of Estates &amp; Facilities</td>
<td>Performance &amp; Statutory Compliance Audit Form</td>
<td>6 monthly</td>
<td>HSEGC EF Performance Review Meetings Trust Board Reports</td>
<td>Designated Officers asbestos</td>
<td>HSEGC EF Performance Review Meetings Trust Board Reports</td>
</tr>
<tr>
<td>Asbestos Register readily available and maintained up to date for all premises, as applicable</td>
<td>Head of Performance &amp; Statutory Compliance.</td>
<td>Performance &amp; Statutory Compliance Audit Form</td>
<td>6 monthly</td>
<td>As above.</td>
<td>Designated Officers asbestos</td>
<td>As above.</td>
</tr>
<tr>
<td>Asbestos Management Plans for relevant premises maintained up to date and fit for purpose.</td>
<td>Head of Performance &amp; Statutory Compliance.</td>
<td>Performance &amp; Statutory Compliance Audit Form</td>
<td>6 monthly</td>
<td>As above.</td>
<td>Designated Officers asbestos</td>
<td>As above.</td>
</tr>
<tr>
<td>Asbestos Priority Algorithm for all relevant premises maintained up to date and fit for purpose.</td>
<td>Head of Performance &amp; Statutory Compliance.</td>
<td>Performance &amp; Statutory Compliance Audit Form</td>
<td>6 monthly</td>
<td>As above.</td>
<td>Designated Officers asbestos</td>
<td>As above.</td>
</tr>
<tr>
<td>Evidence of Annual Asbestos Surveys being carried out &amp; used to inform the relevant Asbestos Register and the Asbestos</td>
<td>Head of Performance &amp; Statutory Compliance.</td>
<td>Performance &amp; Statutory Compliance Audit Form</td>
<td>6 monthly</td>
<td>HSEGC EF Performance Review Meetings Trust Board Reports</td>
<td>Designated Officers asbestos</td>
<td>As above.</td>
</tr>
<tr>
<td>Management Plan</td>
<td></td>
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<td>--------------------------------------------------------------------------------</td>
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</tr>
<tr>
<td><strong>Respiratory Protection Equipment – Face Fit Records</strong></td>
<td>Head of Performance &amp; Statutory Compliance</td>
<td>Performance &amp; Statutory Compliance Audit Form</td>
<td>6 monthly</td>
<td>HSEGC</td>
<td>Designated Officers asbestos</td>
<td>As above.</td>
</tr>
</tbody>
</table>
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/uksi/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 Gas Safety (Installation & Use) Regulations 1998

HSE Approved Codes of Practice (ACOP)

- L21: Management of Health and Safety at Work Regulations 1992
- L27: The Control of Asbestos Regulations 2012

HSE Guidance Notes Relating to Duties of Licensed Contractors

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

<table>
<thead>
<tr>
<th>Version</th>
<th>Date</th>
<th>Author</th>
<th>Ratified by</th>
<th>Comment/Reason for change</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>August 2009</td>
<td>Richard Parris</td>
<td>Health &amp; Safety Committee</td>
<td>New</td>
</tr>
<tr>
<td>1.1</td>
<td>August 2009</td>
<td>Richard Parris</td>
<td>Health &amp; Safety Committee</td>
<td>Change of Trust’s name and logo to reflect integration</td>
</tr>
<tr>
<td>2</td>
<td>March 2013</td>
<td>Mike Parkhill</td>
<td>Policy Committee</td>
<td>Policy updated in line with current practice</td>
</tr>
</tbody>
</table>
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.

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

<table>
<thead>
<tr>
<th></th>
<th>Procedural Document’s Name:</th>
<th>Asbestos Policy</th>
</tr>
</thead>
<tbody>
<tr>
<td>2.</td>
<td>Procedural Document Author:</td>
<td>Designated Officer – Asbestos</td>
</tr>
<tr>
<td>4.</td>
<td>Date of Consultation:</td>
<td>1\textsuperscript{st} December 2011</td>
</tr>
<tr>
<td>5.</td>
<td>Comments Received:</td>
<td></td>
</tr>
</tbody>
</table>

6. Highlight where policy changed following consultation or state reasoning why comments not incorporated:
13 APPENDIX C – PROCEDURES – ASBESTOS

Asbestos Consultant (AC/CA)

Designated Officer Confirms Asbestos Works Required

AC/CA produces indicative costs budget report detailing likely asbestos removal, consultancy and analytical fees AND issues to Designated Officer for review prior to tendering process

AC/CA produces detailed tender specification (incorporating JCT style contract) in line with trust procurement rules. Issues tender (once agreed) to framework asbestos contractors for competitive tendering

Tenders received & opened by procurement team with/without AC/CA in attendance. AC/CA produces detailed report on tenders & issues to designated officer for approval

Pre-Contract meeting with Designated Officer, AC/CA and Appointed Asbestos Contractor. JCT Contracts signed.

Appointed Asbestos Contractor produces plan of work method statement & risk assessments & provides copies of all relevant documentation

Pre-Start Meeting

Project/Contract Start. Commencement of Asbestos Remediation

AC/CA reviews all Contractor paperwork and approves/rejects

AC/CA oversees Analysts who undertake regular supervision of project, carrying out all necessary air tests etc. All attend regular progress meetings during term of contract/programme

Analyst undertakes 4 Stage clearance

Pass

Individual Enclosures/Project Completion

Ac/CA issues certificate of practical completion and certified authorisation for payment/final payment certificate under JCT

Asbestos Contractor issues invoice to client with copy to AC/CA and QS if applicable

Designated Officer Approves payment of invoices once confirmed OK by AC/CA or QS

Qs (if applicable) checks all contract sums and review certificates issued under contract

AC/CA issues invoices for Consultancy and analytical fees

Designated Officer updates Asbestos Register/database to show removal undertaken

Project Completion

AC/CA issues completed asbestos removal project file to Designated Officer which contains ALL paperwork relevant to project from Tender Documents through to Final payment certificates

Analyst undertakes 4 Stage clearance

Repeat Clearance process until pass obtained

Copies of all certificates etc issued to all parties by Analyst

All paperwork issued to AC/CA and Asbestos Removal Project File compiled

Pass Visual/Air Test Satisfactory (Works completed according to contract)
14 APPENDIX D – ASBESTOS INCIDENT FLOWCHART

- Discovery, Damage or disturbance of suspected asbestos containing materials (ACM)
  - Evacuate Area Immediately if suspected ACM has been damaged. Report to Designated Officer or Asbestos Consultant (AC)
  - AC and/or Designated Officer will refer to Asbestos database or survey/register of asbestos and drawings
    - Confirmed as Non-Asbestos
      - RE-OCCUPY AREA
    - Risk Assessment indicates asbestos can be left as no risk
      - Re-occupy Area
    - Risk Assessment indicates asbestos requires removal/remediation and cannot be left as found
      - Undertake emergency tender/works and follow Asbestos Procedures flowchart
      - Re-occupy area

- No records, area shown as not surveyed/accessed or confirmation that product contains asbestos
  - AC/Designated Officer investigate and instruct surveyor to undertake sampling/survey and emergency air monitoring
  - Presence of ACM/Damaged ACM confirmed and risk assessment undertaken by AC to determine next steps

- Re-occupy area
APPENDIX E – RECORD OF SUSPECTED EXPOSURE TO AIR BOURNE 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 at __________________________ I was exposed to what I believe to be 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 Site (if known):

Asbestos Accidentally Damaged Or Disturbed - Yes / No

Asbestos Damaged/Disturbed Before Work Commenced - Yes / No

Type Of Work Being Done:

Equipment Being Used:

Signature Of Staff Member

Supervisor To Complete

Task(s) Employer Informed: Yes / No

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 adviser or the appointed doctor is required to issue a certificate of the examination to the employee and the employer 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

<table>
<thead>
<tr>
<th>Abbreviation</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>ACM</td>
<td>Asbestos Containing Material</td>
</tr>
<tr>
<td>ACOPs</td>
<td>Approved Codes of Practice</td>
</tr>
<tr>
<td>ACMs</td>
<td>Asbestos Containing Materials</td>
</tr>
<tr>
<td>CAD</td>
<td>Computer Aided Design</td>
</tr>
<tr>
<td>CAWR</td>
<td>Control of Asbestos at Work Regulations</td>
</tr>
<tr>
<td>COSHH</td>
<td>Control of Substances Hazardous to Health</td>
</tr>
<tr>
<td>HSC</td>
<td>Health and Safety Commission</td>
</tr>
<tr>
<td>HSE</td>
<td>Health and Safety Executive</td>
</tr>
<tr>
<td>MDHS</td>
<td>Methods for the Determination of Hazardous Substances</td>
</tr>
<tr>
<td>NHS</td>
<td>National Health Service</td>
</tr>
<tr>
<td>PPE</td>
<td>Personal Protective Equipment</td>
</tr>
<tr>
<td>RIDDOR</td>
<td>Reporting of Injuries, Diseases and Dangerous Occurrences Regulations</td>
</tr>
<tr>
<td>TICA</td>
<td>Thermal Insulation Contractors Association</td>
</tr>
</tbody>
</table>
## 17 APPENDIX G– HAZARDOUS FIBRE PERMIT

### Croydon Health Services NHS

### Hazardous Fibre Area permit

<table>
<thead>
<tr>
<th>Works Request/ Docket No.</th>
<th>Permit No.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Sheet No. 1</td>
</tr>
</tbody>
</table>

Is this area listed in the Asbestos register? If in doubt then assume hazardous fibres are present and issue a PERMIT.

### PART 1

**Authorisation** To be completed by the authorised person responsible for the work

**Location of Works:**

**Plant Identification:**

**Description/Nature of Works:**

<table>
<thead>
<tr>
<th>Service Section/Contractor</th>
<th>Contact No.</th>
</tr>
</thead>
</table>

**Competent person Craftsman/Contractor Delete as required**

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, e.g., 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

**Delete as required**

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**

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.

<table>
<thead>
<tr>
<th>Initial Procedure</th>
<th>Written</th>
<th>Date/time</th>
<th>Name/Signature</th>
</tr>
</thead>
<tbody>
<tr>
<td>Authorising officer</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Craftsman</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Extension of time. A formal handover of this permit has been given. Rechecks made and the plant is safe.**

| Authorising officer | |
|---------------------| |
| Craftsman | |

**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 Delete**

| Authorising officer | |
|---------------------| |

**Checked by myself and the area left clean and safe**

---

March 2013
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 this process or certificate. Work forms a part of an overall site 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 persons in the issue and use of permits.
4. Performance monitoring in order to ensure that the code 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 most precautions needed to complete the work safely and without any risks to health in those people who are involved.

The issue of a Permit to Work does NOT:
1. Replace personal means to carry out dangerous work or
2. 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 conversed 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:
1. Ensure proper authorisation of dangerous work.
2. Ensure proper supervision of dangerous work.
3. Ensure proper training of dangerous work.

UNDERSTANDING
Management and Supervision must ensure that persons involved in such work fully understand the exact:
1. Identity, extent and nature of the job.
2. The task involved.
3. The precautions to be taken.
4. Limitations as to the extent of the work and 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 report showing that the nature of the work and the necessary precautions have been checked by the appropriate person. Line management should also provide a formal back-up mechanism to ensure that the part of the plant, installation or equipment affected by the works is in a safe condition before operations/work is resumed to normal.

INDIVIDUAL RESPONSIBILITIES
Other information, instruction, training and guidance should be given to all who have responsibilities under Permit to Work procedure including:
1. Management.
2. Supervisors.
3. Other employees.
4. 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.

1. Demolition.
2. Disassembly.
3. Installation.
5. Renewing.
6. Repairs.
7. Testing.
8. Inspecting.
10. Construction.

This permit may 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 be reasonably expected to disturb the 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 2016.

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 who might be affected by the work, including work processes and premises etc – are self-explanatory. A number of other Acts are applicable to specific industries and work practices, such as construction and railway workers. However, the Health and Safety at Work etc Act 1974 remains the key piece of legislation.

The Management of Health and Safety at Work Regulations (MHSW) 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 HSE and the HSC 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 draws on 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 follows is not exhaustive.

Regulations

Control of Asbestos Regulations 2016
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 2012
The Pollution Prevention (Design & Management) Regulations 2008
The Carriage of Dangerous Goods by Road Regulations 2009
The Carriage of Dangerous Goods by Rail Regulations 1995
The Personal Protective Equipment at Work Regulations 1992
The Workplaces (Health, Safety and Welfare) Regulations 2013

HSC Approved Code of Practice

HSC 181 Regulations 4—9 of Control of Asbestos Regulations 2016
HSC 183 Control of Asbestos Regulations 2016
HSC 187 The Problems of Asbestos Removal at High Temperatures
HSC 187 Working with Asbestos Cement and Asbestos Insulating Board
HSE 510 Asbestos Elimination—Task Manual
HSE 143 Asbestos – The Laminated Contractors Guide
HSE 221 Compendium Guide to Managing Asbestos in P blications

Other Publications

Surveying and Sampling Asbestos-Containing Material

HSE MDHS Series

Other Publications

Surveying and Sampling Asbestos-Containing Material

Working with Asbestos in Buildings (INS) G5: 2013, Health and Safety Executive
Guidance Notes and TCA Guidance Notes

March 2013

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