

Trust Asbestos Management Plan

Document data	
Subject:	Management of Asbestos Containing Materials
Document type:	Management Plan
Document reference	Version 8
Document status:	Approved
Document owner:	Estates & Facilities Director
Executive lead:	Chief Executive
Approval authority:	Health and Safety Committee
Review cycle:	12 Months
Date version effective from:	October 2022
Date version effective to:	October 2023

Asbestos containing materials (ACMs) can be found within various buildings occupied by University Hospitals Bristol and Weston NHS Foundation Trust (hereinafter referred to as UHBW). ACMs can be found as a variety of types of materials and may not always be immediately obvious from their structure and finish. The presence of ACMs does not necessarily constitute a danger to health. However, it is known to be hazardous when disturbed or damaged, and must be treated accordingly. Activities which give rise to airborne dust, e.g. breaking, sawing, cutting, drilling etc, are most likely to present significant risks.

Document change control			
Date of version	Version number	Lead for revisions	Description of revision
02/06/03	1		Issue procedure
03/2010	2		New format
04/2012	3		New format
06/2016	4		New legislation - Approved by Health and Safety Committee, Estates and Facilities Divisional Management Board
06/2017	5		Updated
07/2018	6		Updated
01/2021	7		Updated
10/2022	8		Annual review

Table of contents

1. Introduction	4
1.1 Asbestos materials	6
1.2 Location and condition (Regulation 5)	6
1.3 Asbestos surveys	7
1.4 Monitoring and re-inspection	8
1.5 Long term asbestos management	9
1.6 Priority actions and action plan	10
1.7 Asbestos register	10
1.8 Asbestos locations	11
1.9 Labelling asbestos	11
2. Asbestos procedures	12
2.1 Contractor management	13
2.2 Asbestos encapsulation	13
2.3 Procedure for removal of asbestos	15
2.4 Procedure for project works	16
2.5 Asbestos and CDM projects	17
2.6 Asbestos and non-CDM projects	18
2.7 Issue of permit to work	18
3. Documentation	19
3.1 Risk assessments (Regulation 6)	19
3.2 Plan of works / method statements / safe systems of work	19
3.3 Notification (Regulation 9)	21
3.4 Waiver to the 14-day notification period	22
3.5 Site clearance certification for reoccupation and other air monitoring	23
3.6 Disposal of asbestos (Regulation 24)	24
3.7 Verifying completed consignment notes	25
3.8 Document management	29
3.9 Asbestos incidents & RIDDOR (Regulation 15)	30
3.10 Procedure for previously unidentified ACM's	31
3.11 Accidental release of asbestos (Regulation 15)	34
3.12 Health surveillance (Regulation 22)	32
4. Asbestos training (<i>Regulation 10</i>)	33
4.1 Asbestos awareness	33
4.2 Management training	33
4.3 Contractors - Licensed and non-licensed	34

4.4 Contractors - Analytical, surveying and consultancy	35
4.5 Accidental damage procedure training	36
4.6 Additional requirements to assess after such incident	37
5. Reference documents	38
6. Appendix 1 - Asbestos materials	40
7. Appendix 2 - Sample of asbestos register, example of report sheet	43
8. Appendix 3 - Asbestos locations	44
9. Appendix 4 - Sample - Permit to work, all parts must be completed by the issuing officer applicable to the area of works, see section 2.2.	45
10. Appendix 5 - Sample - Notification (form FOD ASB5)(Regulation9)	46
Sample - Notifiable non-licensed works (form ASBNNLW 1) (Regulation 9)	48
11. Appendix 6 - Contractors content requirements	49
12. Appendix 7 - Sample: - Asbestos clearance - confirmation form	50
13. Appendix 8 - Material and priority scoring	51
14. Appendix 9 - HSE Guidance HSG 210 decision flowchart from a0	53
14.1 Appendix 9.1 Category of works for paper asbestos containing materials	
14.2 Appendix 9.2 extracted from the CL:AIRE guidance	
15. Appendix 10 - HSE guidance	54
16. Appendix 11 - EA example waste consignment note format	58
17. Appendix 12 - The action plan format	59
18. Appendix 13 Trust wide location plan	60

1. Introduction

Asbestos containing materials (ACMs) can be found within various buildings occupied by University Hospitals Bristol and Weston NHS Foundation Trust (hereinafter referred to as UHBW). ACMs can be found as a variety of types of materials and may not always be immediately obvious from their structure and finish. The presence of ACMs does not necessarily constitute a danger to health. However, it is known to be hazardous when disturbed or damaged, and must be treated accordingly. Activities which give rise to airborne dust, e.g. breaking, sawing, cutting, drilling etc, are most likely to present significant risks.

Personnel whose work may bring them into contact with existing asbestos materials, must be trained to recognise the possibility of its presence and what daily precautions to take to avoid potential exposure. Staff and Contractors are not expected to work with ACMs nor be exposed to asbestos fibres.

To ensure compliance with regulation 4, 'Duty to manage asbestos in non-domestic premises' of the Control of Asbestos Regulations 2012, as duty holders for the trust premises, we are required to formulate an asbestos management plan to assist in complying with our duty.

This document will define our asbestos management plan on how we intend to manage the risk from ACMs within our premises and prevent harm from exposure to these materials from general occupancy and when undertaking any maintenance works.

The purpose of this plan is to identify the Trusts responsibilities with regard to how we will manage and control asbestos on all our sites that are related to this trust.

The plan will also detail how we will manage and monitor all ACMs that remain in situ to continue to ensure compliance with Regulation 4.

This document must be read in conjunction with our Control of Asbestos Policy, which details specific roles and responsibilities delegated to Trust employees on how we intend to put in place robust procedures to manage the ACMs that remain in situ throughout trust premises. Within the policy the roles and responsibilities section defines each delegated individual's duties to assist the Trust in compliance with this management plan and the tasks that they must undertake.

This document formulates our detailed management plan and procedures to be implemented across the trust to assist in compliance with regulation 4 of the Control of Asbestos Regulations 2012 and at the same time protecting the health, safety and welfare of our employees and others who may be affected by our undertakings.

The information must be communicated to all those who may be affected, particularly persons or organisations that undertake maintenance and repairs to the Trust premises.

Our permit to work system as per section 2.7 details the procedure to be undertaken to ensure all works are controlled and that a safe system of work is implemented to control the risk.

Where applicable in accordance with Safety Representative and Safety Committee Regulations 1977 information will be made available to the named person representative to ensure they are consulted about our arrangements and when requested records will be made freely available for their reference. Where any employees are not represented by a trade union, the same as above we will apply, and they will be consulted in accordance with the Health and Safety (Consultation with Employees) Regulations 1996.

Within this plan the term Responsible/Appointed Person is used to define the specific responsible person as defined within section 3.1 of our Control of Asbestos Policy - The Safe Working with Asbestos.

1.1 Asbestos materials

Within the Trust premises there are three main types of Asbestos that have been identified within the materials that were used in the construction of the various building and associated structures.

These are:



Blue - Crocidolite asbestos which is assessed as the highest risk and can be found in materials such as sprayed coating, lagging, insulating board, sometimes in some cement sheeting and other materials that may be defined within our asbestos register



Brown - Grunerite or Amosite, as its often known, asbestos which is assessed as the second highest risk and can be found in materials such as sprayed coating, lagging, insulating board and other materials that may be defined within our asbestos register



White - Chrysotile asbestos which is assessed as the third highest risk and can be found in materials such as cement based products, floor tiles, bitumen, insulating board and other materials that may be defined within our asbestos register

As defined above they are all a risk, just different levels of risk and with this plan we aim to control all ACMs within the Trust premises to the same high standard. Along with our appointed consultants and contractors we will do everything that is reasonably practicable to do so, to identify ACMs on our premises and ensure this information is communicated to those who need to know.

A thorough inspection of our premises has already been undertaken and is available for reference along with this asbestos management plan. Reference must be made to existing surveys maintained on our internal database system, before works can commence.

Those who need to have access to it will need to undertake internal training on how to utilise the system to its best ability and ensure the correct information is accessed as required for the task being undertaken. A training process has commenced and identified those that need access to ensure the right level of information can be called upon as required to undertake tasks within our facilities.

1.2 Location and condition (Regulation 5)

The information regarding the location and condition of the ACM's at any of our properties are held by the Responsible/Appointed Person and is located in the Facilities Directorate building.

In April 2011, the Trust undertook a comprehensive survey of the various sites that were constructed pre-the year 2000 to identify the locations of asbestos as far as is reasonably practicable.

The survey identified that asbestos had been used throughout the various buildings and associated buildings. This survey was completed in March 2012. A significant number of

samples were taken for laboratory analysis to establish the presence and type of asbestos, and a comprehensive register compiled.

Further to that, our previous analytical company had carried out a management survey and re-inspection of areas covered in the previous survey to give a more up to date survey and register and to bring in line with HSG 264 The Survey Guide. This was undertaken and is available for reference via the database system.

Further to contractor approval process the applicable company will have been appointed and will continue to maintain the management register moving forward.

1.3 Asbestos surveys

There are three different types of survey referred to in the survey guide HSG 264, but they are described in two ways as below.

The definition of each type is as follows:

1.3.1 Management Survey

A management survey is the standard survey. Its purpose is to locate, as far as reasonably practicable, the presence and extent of any suspect ACMs in the building which could be damaged or disturbed during normal occupancy, including foreseeable maintenance and installation, and to assess their condition.

Management surveys will often involve minor intrusive work and some disturbance. The extent of intrusion will vary between premises and depend on what is reasonably practicable for individual properties and should include an assessment of the condition of the various ACMs and their ability to release fibres into the air if they are disturbed in some way.

We require this survey to involve sampling and analysis to confirm the presence or absence of ACMs. However, a management survey can also involve presuming the presence or absence of asbestos. A management survey can be completed using a combination of sampling ACMs and presuming ACMs or, indeed, just presuming. Any materials presumed to contain asbestos must also have their condition assessed (e.g. a material assessment, see section 1.6).

Enough samples must be taken to confirm the location and extent of ACMs. Samples from each type of suspect ACM must be collected and analysed. If the material sampled is found to contain asbestos, other similar materials used in the same way in the building can be strongly presumed to contain asbestos. Less homogeneous materials (e.g. different surfaces/coating, evidence of repair etc.) will require a greater number of samples. The sample number must be sufficient to establish whether asbestos is present or not.

All areas must be accessed and inspected, as far as is reasonably practicable and should include under floor coverings, above false ceilings, and inside risers, service ducts, lift shafts etc. as these areas could be accessed during maintenance and installation works within the Trust.

1.3.2 Refurbishment and demolition surveys

This type of survey is required before any refurbishment or demolition work is carried out and this type of survey is used to locate and describe, as far as reasonably practicable, all ACMs in the area where the refurbishment work will take place or in the whole building if

demolition is planned.

The survey must be fully intrusive and involve destructive inspection, as necessary, to gain access to all areas, including those that may be difficult to reach. Refurbishment and demolition surveys are intended to locate asbestos on the relevant part or entire building, as far as reasonably practicable.

There is a specific requirement in CAR 2012 (regulation 7) for all ACMs to be removed as far as reasonably practicable before major refurbishment or final demolition. Under CDM regulations, the survey information must be used to help in the tendering process for removal of ACMs from the building before works starts. We will ensure that as the client and responsible duty holders for our facilities, we will provide the relevant documentation to facilitate this requirement.

Aggressive inspection techniques will be needed to lift carpets and tiles, break through walls, ceilings, cladding and partitions, and open up floors. This level of intrusiveness will require good communication and coordination to allow suitable access to areas within our properties and must not be carried out without the safe working procedures in place.

Due to the nature of our site we will require airborne fibre monitoring to be undertaken during a Refurbishment / Demolition survey, which will be undertaken by our appointed analytical company at a frequency and type to be defined after consultation with the Responsible/Appointed Person.

Although different types of survey can be specified and used depending on the circumstances, it is important that the Responsible/Appointed Person and the Surveyor know exactly what type of survey is to be carried out, what the specification for each type are, and in which areas they are to be used. The types of survey carried out must conform to the standard HSG264 to ensure compliance with regulation 5 of CAR 2012, otherwise interpretation of the survey reports will be difficult.

Due to our larger premises and the complexity of managing these areas, we will often require a mixture of different surveys and these will be advised accordingly.

1.4 Monitoring and re-inspection

Monitoring of the ACM's shall be an ongoing task, however formal re-inspections will be carried out by the Responsible/Appointed Person as defined within our Control of Asbestos Policy.

From the Asbestos Register (see section 1.6) the material risk assessment score along with the priority assessment score will define on the priority assessment register the frequency of re-inspections.

These should be undertaken at least annually, but where deemed low risk to very low risk we may define a 2 yearly re-inspection date. With the high-risk material score, the minimum will be annual re-inspection, but where deemed necessary, we may define that a more frequent time is required depending on the location and sensitive areas within the trust. All re-inspections shall be recorded on the Risk Register.

See appendix 8 for the HSE guidance assessment tool to assist with material scoring.

Material risk assessment strategy of re-inspections:

Material score from report/survey:	Risk scoring:	Frequency of re-inspection:
10	High risk potential	Annual visual inspection
7 – 9	Medium risk potential	Annual visual inspection
5 – 6	Low risk potential	2 yearly visual inspection
Less than 4	Very low risk potential	2 yearly visual inspection

If any circumstances have changed with regards to the last material score and the risk has increased in score, then further action may need to be undertaken to safe guard this area until such time as a plan can be put in place to reduce the risk. Such examples may include where a material previously scored as a low to medium risk has been severely damaged, or protective covering becoming damaged or loose increasing the risk to high and needs immediate action. This may require specialist advice from other competent persons and they will be contacted immediately for guidance.

The Responsible/Appointed Person appointed to undertake the reassessment must have sufficient training and competency to undertake this important role and have a knowledge and understanding of the HSE guidance.

The monitoring should also include checking that labelling and signage are still displayed and have not been painted over, removed, or faded over time, see section 1.8 for further information on our labelling plan.

1.5 Long term asbestos management

The overall aim is to ensure that all ACM's through re-inspections, remedial and removal works are effectively managed and that the risk to persons are reduced to its lowest practical level.

There are 4 recommended options available to the Trust in terms of management of our ACM's:

Number:	Option:	Reason behind taking this option/action:
1	Do nothing	If the ACM is in good condition and unlikely to be disturbed, the best course of action is to leave alone and manage the ACM so that it remains in a good condition.
2	Protect	If an ACM is likely to be damaged in its location, then the ACM may be protected by means of a physical barrier to prevent damage, labelling and continue to manage.
3	Encapsulate	Seal the ACM to prevent surface damage with a suitable material sufficient to protect against accidental damage as far as possible.
4	Removal	Removal of the ACM by a licensed contractor or non-licensed trained personnel, where applicable, as per our priority assessments. But must also be carried out prior to any refurbishment or demolition works to ensure compliance with CAR 2012 regulation 7 ACOP 190.

The option required for each ACM situation will be determined by the Responsible/Appointed Person, with consultation with other competent persons where

required, as all situations differ and the material assessment along with the priority assessment will need to be completed to verify why the options above have been selected.

It does not automatically follow that those materials assigned the highest score in the material assessment will be the materials that should be given the priority for remedial action.

Further priority must be determined by carrying out a risk assessment which must consider the following factors:

- occupant activity;
- likelihood of disturbance;
- human exposure potential;
- and maintenance activities.

This assessment again uses a score system to assist in making decisions on what materials need to take priority. The Responsible/Appointed Person must ensure they understand the assessment scoring required, and if further guidance is required contact a competent company or person for specialist advice. See appendix 8 for the HSE guidance assessment tool to assist with priority scoring.

Asbestos that's managed and well maintained can reduce the risk factor considerably as the Trusts long term plan is to remove asbestos from the site, but this will only be achieved by planned phased removal during refurbishment works and when deemed as priority by our completed assessments. Until then, the Trust strategy is for asbestos to be managed and maintained through encapsulation and periodic inspection as far as possible.

We know that there is asbestos in the Trust premises, hence the reason this plan is put in place. There are common types of materials that contain asbestos listed in appendix 1 to assist with understanding the potential locations and ACMs that may be in situ with specific reference made to our surveys and database.

1.6 Priority actions and action plan

The Responsible/Appointed Person requesting assistance from our Independent Asbestos Consultant where required, will transfer conclusions from our material and priority assessment process to our Asbestos Action Plan, see appendix 12 for example.

The Action Plan will contain priorities and timetables and/or targets to reach. This will be produced for both remedial works; for example, planned asbestos removal works and non-remedial works; e.g. training issues, survey requirements etc.

Consideration of a timetable for the required works will need to consider many factors, including:

- (a) Risk from ACMs;
- (b) Building occupation constraints;
- (c) Financial resources;
- (d) Other planned buildingworks.

The Responsible/Appointed Person will review the action plan, which will be finalised and/or agreed by the Chief Executive.

The Action Plan will be reviewed every twelve months and later retained as an archived document, kept by the Responsible/Appointed Person for future reference for a minimum

of 10 years.

1.7 Asbestos register

A record will be kept of all known asbestos products and materials that are within our Trust premises and sites. Known as the Asbestos Register and this shall detail the type of Asbestos, its location, and its physical condition. The master copy of the Asbestos register is held by the 'Responsible/Appointed Person' a sample page of the register can be found in Appendix 2 to show the layout of the document and how it can be used for easy reference.

All contractors must make prior appointments to gain access to the register which must be during normal working hours, contact the 'Responsible/Appointed Person' to arrange a suitable time.

If emergency out of hours, access is required then access can be obtained via the Shift engineer or the On-Call Estates Officer.

The registers are kept in the following location:

- Estates Department;
- Office of the 'Responsible/Appointed Person'.

Electronic version (Microsoft Access) is on shared drive accessible to all, editable only by the 'Responsible/Appointed Person' and our consulting company.

Register link: ???

To carry out a search on the electronic register follow this procedure:

- Click on the link Estates Manager Icon,
- Property database
- Asbestos Building,
- Sub menu,
- Zone name,
- Select name,
- Select detail.

The Responsible/Appointed Person shall be the only person who is authorised to undertake updates to the registers as necessary based upon sampling, refurbishment or remedial works carried out and on any further information gained during re-inspections.

Any information that persons may feel is relevant to updating the register must be passed on to the Responsible/Appointed Person.

1.8 Asbestos locations

As defined previously we must do all that is reasonable to identify whether there is or may be asbestos present within our premises. The surveys identified in section 1.7 are our reference guide to identified, known or suspected locations and will be the guide to all persons on the location of ACMs.

Any presumptions are to be treated as ACMs and the location recorded as if they had been identified positively and the same management plan applied. As defined on the next section 1.9, a system of labelling will be put in place to identify locations and ensure that

all persons know that the asbestos registers identified must be consulted before undertaking any works.

Asbestos that remains in situ must be made known to all relevant parties that need to know, this should include maintenance workers, contractors and any occupants that need to know for their protection or for the safe guard of others. This will ensure that if persons know the locations it will reduce the risk of accidental disturbance during normal occupancy and ensure they know that if this material is disturbed or damaged it must be reported immediately following the accidental damage procedure in section 4.5.

It would also be of great benefit to the Trust if materials that look like asbestos are identified and proven to be non-asbestos and be labelled, this procedure could follow a labelling system as identified in section 1.9.

1.9 Labelling asbestos

We will use labelling with industry standard asbestos labels, see Fig 1 for the fixing of appropriate warning signs to be carried out in plant rooms, boiler houses and on asbestos waste etc. where deemed necessary to ensure compliance. Examples can be seen in Fig. 1a with use on ducting and cupboards within storage room which is not accessible by members of the public.



Fig. 1



Fig. 1a

However, on all visible ACM's in public areas (i.e. wards, departments, Out-patient areas, circulation area, etc.) will not be labelled with the figure 1 option, due to patient perception and concern of the material. These materials will still be recorded within the register. As labelling has not been adopted in all areas, it is imperative that any person initiating any works on Trust properties must refer to the asbestos register.

The regulations make it clear that labelling should be the first line of protection, if the use of asbestos labels is not practicable then another system of labelling may be selected using a colour coded system such as the green and red dot method that may adopted (see fig 2), the green NA defining non-asbestos and the red A dot defining as ACM.

Fig. 2



Older previous labelling regimes may also appear throughout the Trust buildings and persons must always consult the register before proceeding with work. All persons working on our sites must be made aware via training of the different examples of such labelling that can be found in areas as displayed below in Fig. 3.

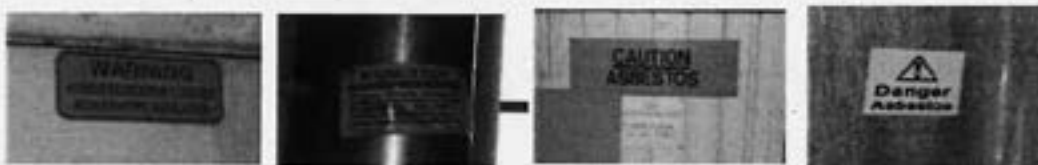


Fig. 3 examples of the number of different signage that have been used

If labelling is not available in all areas, we must ensure that the persons undertaking works in these areas are aware of the locations before starting their works; this would need to include asbestos awareness and awareness of this management plan and locations of ACMs in their particularly work area.

As identified in section 1.4 the monitoring system should include checking that labels are still visible and if they need replacing, ensuring the correct label is stuck in place.

2. Asbestos Procedures

2.1 Contractor Management

The Responsible/Competent Person will undertake a formal assessment of any contractors that will be undertaking works for the trust to ensure they are competent to undertake the works required.

This will be done using a formal questionnaire and requesting documentation to be forwarded to back up their answers. The questionnaire will assess the following key points:

- An evaluation of the competency of a contractor including a check on the contractor's documentation to ensure it is relevant to the works to be undertaken;
- Assess that they have the right insurance to undertake the required asbestos works;
- They have trained and competent persons to manage, supervise and undertake the works;
- Request copies of previous examples of their safe systems of work, plan of works (method statements), risk assessments to assess their documentation;
- Request a copy of their company policy and work procedures;
- Request copies of company accreditations, awards, or governing parties to assess third party verifications;
- Request copies of their asbestos awareness training for all trades and specialist asbestos training for other works;
- Request any other information that we feel may be relevant to the works to be undertaken.

When the Responsible/Competent Person has assessed the above and deemed the company suitable to undertake the works then they will be signed off as an approved contractor. If there are elements of information missing, the contractor will be contacted for response to verify why the required documentation has not been submitted. Failure to complete the approval process in full will require the contractor to be removed from our approved list.

When work is being undertaken the Responsible/Competent Person shall randomly undertake an audit of the appointed contractor/s involved in the works or request an external party to undertake an audit on our behalf, to ensure they are undertaking the works in a safe and compliant manner.

The Responsible/Competent Person would only be expected to inspect live working areas as far as reasonably practicable by using the vision panels and/or CCTV provided and would not be required to enter a designated respirator zone unless trained, medical, face fitted and authorised to do so. The audit can be undertaken checking all external elements of the works, assessing for general cleanliness and good working practices.

The audit will assess the following key issues:

- An evaluation of the competency of a contractor ensuring that the works are being undertaken correctly and in accordance with the plan of works see section 3.2 for further reference with regards to plan of works;
- Is the work/enclosure area set up correctly and protecting others from entering the area, signage displayed, and assessment taken for emergency routes;
- Checking that all required documentation is on site and relevant to the works, such as plant certificates, training certificates, medicals certificates and RPE certification, see section 3 for further reference with regards to contractor documentation;
- Is the DCU set up correctly, in full functioning order and kept in a safe place;
- Is the stated air monitoring being undertaken, analyst present on site and formulating correct documentation;
- And any other further information that believes to be relevant to the works being undertaken.

The Trust have a duty of care to ensure that hazardous waste that leaves our premises is done in a safe and compliant manner, contractors will also be assessed for waste handling, disposal, and transportation methods, which must be undertaken in accordance with the Hazardous Waste Regulations 2005 and the Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations 2004.

All documentation regarding waste removal must be forwarded to the Trust, see section 3.6 for further information.

Copies of audits will be forwarded to relevant parties for action where appropriate and if any contractor is deemed to be working unsafe or in breach of any regulation the Responsible/Appointed Person has the authority of the Trust to stop works until further notice.

At designated suitable intervals we will request external auditing via our approved consultant, undertaking random audits of our contractors to assist in monitoring that our own auditing is being undertaken to the standard required.

As our asbestos register identifies changes in the risk of ACMs within our premises we will require contractors to be appointed to remove, encapsulate, and carry out analytical works and other asbestos related works.

It is paramount that we manage not only asbestos contractors but all other contractors that may be required to work on our premises. We must ensure they are made aware of the Trust asbestos policy and procedures and attend a site induction to go through what is required of them when working on our premises.

The site induction process must be arranged at a suitable time to suit the 'Responsible/Appointed Person' and must be undertaken before any works commence, even if it is a small short duration job, the site induction process must be completed.

A permit to work system has been put in place to assist with contractor management and is covered in section 2.7.

All contractors must understand the importance of referring to our asbestos register where applicable and know where to obtain the information as defined in section 1.8 relevant to the building or area they will be working in.

Contractors must be informed that if the applicable register is not available or does not cover sufficiently the area they will be working in, they must not start the job and refer to the Responsible/Appointed Person for further instruction.

All contractors will need to have gone through the approval process defined in section 2.1 before undertaking any works for the Trust.

2.2 Asbestos encapsulation

If as defined in section 1.5 the long-term management assessment has identified encapsulation will be a suitable method to maintain the ACMs to ensure that exposure can be reduced to as low as is reasonably practicable, then contractors will be employed to undertake the works.

On materials such as spraying coating, lagging and AIB this will need to be an asbestos licensed contractor, where a non-licensed product we will often select a licensed contractor to undertake the works dependant on the risk. Non-licensed trained persons may be used to undertake this type of works ensuring that they have the correct equipment, training, and company insurance to undertake such works.

Re-inspections of asbestos encapsulation areas will be carried out on a periodic basis as defined in section 1.4 and 1.5 with regards to the potential to disturb the encapsulation.

1.3 Procedure for removal of asbestos

The applicable asbestos register will be checked as defined in section 1.7 before any project work commences. Any areas of uncertainty not shown shall be assumed to contain asbestos until sampling is undertaken.

The estates department will plan all asbestos removal works, prior to its removal. A clear brief of the work to be undertaken will be issued and that will consider all safety precautions needed, program of work, details of work and potential risks to employees and patients. This will also include the potential effect the work may have on service provision.

The estates department will liaise with the departmental manager to plan any asbestos work that may influence patient care and ensure that all staff in the affected area are informed of the work to be undertaken and additional precautions taken accordingly to control the risk.

All asbestos work (this includes non-licensed works) areas are to be clearly identified as designated areas to ensure compliance with regulation 18 and kept separate from adjoining areas to assist with control. The contractor for the works will be required to set up a controlled area, display signage and monitor that the controlled area remains in place throughout the duration of the works.

Appendix 6 sets out the Trust requirements for the contractors report to ensure compliance and monitoring of the works are maintained.

The Responsible/Appointed Person must commission the draft specification of the works and where required call upon specialist advice, ensuring that the results of the applicable asbestos survey are included within the specification to enable sufficient tendering for the works. The specification must be reviewed by the relevant manager/s or other relevant employees that may be affected by the works and the Independent Asbestos Consultants where deemed necessary. When completed the relevant Responsible/Appointed Person

must issue the specification to the approved licensed asbestos removal contractors for quotation/tender return. Only approved asbestos removal contractors are to be used.

When the tendering/quotation procedure has been completed and purchase order has been raised, the communication and coordination channels can be opened to allow the Asbestos Removal Contractor to submit their ASB5/ASBNNLW1 notification (see appendix 5 for examples) in order to send to the HSE. They must also prepare their risk assessments and plan of works and provide copies for our reference (see section 3.1 for risk assessments and 3.2. for plan of works). With regards to notification requirements for works see section 3.3.

To further assist with the safe and compliant way we require our works to be undertaken the Responsible/Appointed Person must arrange a pre-start meeting with all other relevant persons. The aim being to minimise the disruption and maximise the smooth running of the project. Such items that must be discussed further include:

- (a) Assistance in making space available for asbestos remedial works equipment, such as parking for decontamination units (DCUs), office space for the Analyst, etc.;
- (b) Arranging any necessary services isolations or enabling works; for example, steam or electrical shutdowns, cutting out of non-asbestos redundant ductwork, removal of fixtures, fittings, furniture, or certain building features necessary for the completion of the project;
- (c) Site familiarisation walks with key personnel such as Asbestos Contractors, Department Managers, etc.;
- (d) Informing other key staff and contractors of the location of any known ACMs affecting the project;
- (e) Sensitive areas that contractors must not enter;
- (f) Fire escape routes that may be affected;
- (g) Lifts, corridors, canteen, and other such public areas that must not be used;
- (h) Signing in and security arrangements, particular if out of normal working hours;
- (i) Particular attention to co-operation and co-ordination, which will be needed where non-asbestos licensed contractors are used for enabling works prior to asbestos remedial works. Therefore, they need to be made aware of the risks and related controls, and that such enabling works are sufficient to provide necessary access, etc., for the Asbestos Licensed Contractors works. These may need additional training, face fits and medicals to enter such areas.

The Responsible/Appointed Person must send an e-mail to all UHBW parties to include Department Heads, Site Security, Cleaning Services, IT Services, Telephone Services, and anyone else who may need to know and may be affected by the works.

We must give sufficient details about the location and proposed works and the proposed programme for the works, inviting them to express any concerns about the works and/or the programme.

If concerns are raised that were not originally discussed at the point of tendering, then they may need to be passed on to the asbestos removal contractor to discuss if this will have impact on the original quotation and programme of works.

To ensure that all relevant persons are reminded the Responsible/Appointed Person must

send an e-mail a day or so prior to the actual removal works to inform security and the immediate adjacent persons who may be affected by the works to ensure all pre-agreed arrangements have been made. If at this point the Responsible/Appointed Person is made aware of changes that may delay the start of the project, they must inform the asbestos removal contractor as soon as possible as this may require a withdrawal of a notification to the HSE, see section 3.3.

2.4 Procedure for project works

The applicable asbestos register will be checked as defined in section 1.7 before any project work commences. Any areas of uncertainty not shown shall be assumed to contain asbestos until sampling is undertaken.

A significant responsibility is the requirement to undertake a refurbishment and/or demolition survey to HSG264 of the areas before a project starts, where work will entail demolition or exposure of parts of the structure or fabric that could not be seen during the management survey, and where major refurbishment works are to be undertaken.

Prior to a Main Project Contractor having occupation of the site the Responsible/Appointed Person, shall arrange for all ACMs to be removed from the working area or included as part of their contracted works. This will be confirmed to the Main Contractor by issue of an 'Asbestos Clearance - Confirmation' form detailing what asbestos has been removed or left in situ and may still pose a risk.

Appendix 7 shows a sample copy of an 'Asbestos Clearance - Confirmation' form that will be issued.

If suspect materials are discovered during project works, the Project Manager must stop works and ensure they know the Accidental Damage Procedure as defined in section 4.5 and ensure they inform the Responsible/Appointed Person as soon as it is safe to do so.

The Project Supervisor must liaise with the Responsible/Appointed Person regarding the appointment of an analyst and on the most appropriate remedial action to be taken.

Upon completion of the remedial works, a copy of the sampling, air monitoring level and details of the removal contractor and analyst shall be placed on the project file. A copy of this will also to be handed to the Responsible/Appointed Person to keep a copy for the asbestos register.

All appointed contractors are required to ensure that complete co-operation is maintained with the Responsible/Appointed Person to assist in their duties to ensure that the Trust complies with our duty of care with regards to compliance with CAR 2012. Any contractor failing this will have the potential to be removed from the approved contractors list.

2.5 Asbestos and CDM projects

The Project Managers, the Responsible/Appointed Person, and the Independent Asbestos Consultant should directly consult with the Designer and the Principal Designer for the project. A strategy should then be developed on how to control the risks from the asbestos during the project. At this stage, it is not always possible to involve the Principal Contractor and if this is the case, some of these considerations need to be addressed at a later date, when the Principal Contractor has been appointed.

Factors to be considered at this stage include:

- (a) Whether asbestos will be interfered with during the project;
- (b) Whether the Designer can "design out" the risk by avoiding disturbing asbestos;
- (c) Whether additional protection measures will be necessary;
- (d) Whether it will be necessary to remove the asbestos prior to the works commencing;
- (e) Whether there is a risk of the work interfering with undiscovered asbestos;
- (f) Whether the project provides the opportunity to remove asbestos, even if it is not interfering with the work (this is particularly relevant if some asbestos has to be removed directly in connection with the work);
- (g) How emergencies will be dealt with, such as inadvertent exposure to asbestos.

Having taken these factors into account, any residual risks from asbestos must be included in the Construction Phase Plan (CPP) by the Principal Designer. The CPP is then developed by the Principal Contractor, who is responsible for setting up a control system to control the risk from the asbestos in the CPP. The Principal Designer must determine whether the proposed controls are satisfactory and process the acceptance of the plan via UHBW in the usual manner.

During the construction phase, the Principal Contractor is responsible for controlling the risks from asbestos. The Principal Contractor should continue to liaise with UHBW and the Principal Designer, if the situation changes during this phase, for example, if any contract variations result in further disturbance of asbestos.

2.6 Asbestos and non-CDM projects

For general works carried out by external contractors, the Project Managers for the contractors must liaise with the relevant Responsible/Appointed Person. The factors to be considered are identical to those outlined above, although there will be no Principal Designer and the Designer may simply be the person specifying the work, we require the same high standards of communication and coordination to be applied.

Having selected a suitable contractor, the Project Managers, the Responsible/Appointed Person together with the Independent Asbestos Consultant and the selected contractor, must consult and go through the process of work. The contractor must carry out a risk assessment on the risks posed by the presence of asbestos and a method statement determining how they will control identified residual risks.

An additional risk in these circumstances is the possible presence of UHBW staff carrying out their normal activities. In most CDM projects, the construction site is clear of people who are not employed in construction. In this case, however, considerable minor work may be carried out with non-construction personnel present and the special risks posed by this and the presence of asbestos need to be addressed.

Before work commences, the Project Managers, the Responsible/Appointed Person and other relevant Trust employees that may be affected by the works, must be satisfied that the contractor has addressed all the risks in the risk assessment and that the arrangements to control those risks outlined in the method statement are satisfactory.

During the work, the Project Managers and the Responsible/Appointed Person must

monitor the activities of the contractor and ensure that the works have not deviated away from the agreed safe systems of work.

Other considerations must be made for restricted access to important areas of the building, access to certain lifts, specialist wards, emergency routes and fire exits, and other such important areas of the day to day running of the Trust which may be affected by the works.

2.7 Issue of permit to work

No work related to asbestos must be carried out without a permit to work asbestos issued in accordance with the Trusts permit to work procedures. Any person carrying out work in areas designated as or having the potential to contain asbestos, must obtain a permit to work prior to the commencement of that work.

A permit to work asbestos will not be issued without the appropriate risk assessment and method statement being presented for comment (the only exception to this procedure is if the work is deemed to be emergency works), but a dynamic risk assessment must be prepared and a safe system of work still applied for the general make safe required for that emergency.

All permits to work for asbestos must be returned to the issuer at the end of the works. A sample permit can be found in Appendix 4.

All appointed contractors are required to comply with the permit to work system, if contractors are identified by-passing the permit to work system, they will have the potential to be removed from the approved contractors list.

The Trust does not expect any contractor or employee to take a risk when it comes to asbestos, this permit to work system has been put in place to not only protect the individual, but also prevent others from being harmed that may be affected by the works.

Copies of permit to work when completed will be retained for a minimum of 5 years by the Responsible/Appointed Person in the relevant file for the works.

3. Documentation

3.1 Risk Assessments (Regulation 6)

General asbestos risk assessments, following the identification of ACMs have been carried out by the Trust in accordance with HSG264 and the Trust Risk Assessment template and are available for reference as required

HSG264 provides a material assessment algorithm which indicates the potential of materials to release fibres when disturbed, considering product type, extent of damage, surface treatment and asbestos type. The assessment of risk posed by the material considers the material assessment and other factors such as location, size, use of area and occupancy. See Trust Risk Assessments for Asbestos on the our database for further details.

When appointing asbestos removal contractors, they must complete site specific risk assessments for the works to be undertaken. The risk assessments must be used to formulate the plan of works and both incorporated into a safe system of works and/or company procedure can define the generic safe systems to be applied. They must also complete risk assessments to identify what category of works the removal will come under and what the expected exposure will be.

Risk assessments must be reviewed by the Responsible/Appointed Person as per section 3.1 when approving contractors or as part of the audit process. If the risk assessments are not deemed suitable or sufficient then the works must be stopped, and reassessment undertaken.

Further requirements for risk assessment include looking at non-asbestos risks involved, some of which are listed below and should be reviewed as part of the approval process, ensuring the safe systems of work and controls are defined in their risk assessments and translated into their plan of works.

Non- asbestos risk:	Examples of safe systems and controls to review in their risk assessments:
Biological/Chemical	Areas that have biological risks will require hygiene cleaning, specialist RPE and protective clothing. Where works are adjacent to live plant processing chemicals then additional chemical protective coveralls, gloves and eye protection must be worn at all times. Can the area be isolated.
Confined space	Confined space PTW, trained site team, escape set provision, continuous gas monitoring, rescue plan tested intrinsically safe equipment, lighting, ventilation, heat, discarded syringe waste, H ₂ S.
Hand arm vibration	Assess exposure rating, select low exposure equipment, above EAV record times, rotate users, exercise hands, maintain records.
Manual handling	Trained persons, use wheelie bins, safe lifting techniques, assess weights, use team lifting.
Members of the public/other workers	Control areas, erect security fencing around asbestos area, display signage, challenge those that should not be in the working area, coordinate changes in access and egress before works commence.

Noise	When working in noisy plant areas, mandatory hearing protection zones, trained in fitting/wearing protection, noise assessments.
Slips and trips	Work areas kept clean and tidy, loose or trailing cables to be kept overhead where possible, avoid heavy traffic areas, good lighting, correct safety footwear, clear up spills, salt footpaths in freezing temperatures.
Work at height	Scaffolding erected by CISRS card holders, TG 20 or design specification, mobile tower required to access PASMA trained personnel only to erect, scissor lifts/MEWPs IPAF trained personnel only, work at height training, personal fall protective equipment, barrier open holes/excavations, step ladders / access ladders short duration only, suitably tied/footed.

This list is an example of the most common non-asbestos risks and is non-exhaustive, other site specific risks may present themselves and must be included in the assessment as applicable.

3.2 Plan of works / method statements / safe systems of work (Regulation 7)

All work involving asbestos including maintenance, analytical and survey work must have a written plan of work prior to the commencement of that work.

The Responsible/Appointed Person must review the plan of work as per section 2.1 when approving contractors or as part of the audit process. If the plan of works is not deemed suitable or sufficient then the works must be stopped, and further information added as applicable.

If further guidance on removal methods and/or plan of works is required, the Responsible/Appointed Person may contact a competent company or person for specialist advice.

The following is a detailed list of information that the HSE have provided to licensed contractors to ensure that their plan of works include the required information, which can be used as an assessment aid to ensure that the plan of works is suitable and sufficient.

The scope of works should include:

- (a) work location and attendance times/dates;
- (b) contact details for the supervisor, senior manager, analyst to be used;
- (c) survey details and where the works are being undertaken;
- (d) how they will co-ordinate with Trust staff;
- (e) what are they going to be doing;
- (f) how they will safeguard the work area and protect others;
- (g) what asbestos is to be removed and what removal techniques will they be using.

Equipment, materials & controls:

- (h) there needs to be details on where the enclosure is going to be set, size it will be and where the airlock and bag lock will be located, taking into consideration any fire exits routes that need to be kept open;
- (i) details of where and how the air management unit will be set up, ensuring that it vents externally, has access to power and the certification;
- (j) arrangements for smoke testing and witnessing, that we require a Responsible/Appointed Person to be present to witness before enclosure

- can go live;
- (k) location of the waste & transit routes, how signs will be displayed;
- (l) any other exclusion areas zones that may be set up during the works, such as around the DCU and skip;
- (m) what specification of equipment will be used;
- (n) where equipment will be placed, stored securely overnight;
- (o) details on RPE/ PPE, DCUs, H-Vacs, NPU's, CCTV/viewing panels, wet-strip equipment, hand tools, sprays, gels, fencing/barriers, and signage;
- (p) where they will connect to water and power supplies and where the waste DCU drainage will be disposed of;
- (q) rough estimate on how much waste they expect to be removed for the work and what method containment will they be using and where the waste will be going and who is transporting there;
- (r) what arrangements are they putting in place for welfare do they require access to our facilities on site.

Site specific information:

- (s) names of site specific contacts and how they will ensure good lines of communication with the Responsible/Appointed Person;
- (t) if any other licence holders will be involved in the works such as ancillary scaffold contractors or supervisory licence holders;
- (u) any pre-planning arrangements that need to be in place to ensure they do not have a negative impact on the hospital day to day running and that we do not affect their works;
- (v) what emergency arrangements and procedures need to be in place, will their enclosure block routes of escape, do we need to isolate smoke/fire alarms;
- (w) any other significant risks that need to be assessed for the works, such as live wards, occupied areas, coordinating vehicle access, site induction procedure, access to the asbestos register and how these are going to be controlled.

The method of work explaining how exposure and spread will be minimised:

- (x) what the site-specific sequence of work will be with regards to setting up, building enclosure, smoke testing, starting removal, complete removal, analytical stage;
- (y) what methods are going to be used for reducing exposure and spread;
- (z) how often managers will visit site to measure compliance and performance, how often will the works be audited;
- (aa) assessment of non-asbestos factors (such as working at height, working in confined spaces, live electrical installations, third parties, live hospital, hot works.

The management arrangement:

- (bb) how will the supervisors/managers monitor the works and ensure the plan of works is being followed;
- (cc) what records will be maintained during the works, will these be in an email format for our records;
- (dd) what air monitoring/background reassurance monitoring is to be undertaken during the works;
- (ee) record of expected exposures, backed up with personals from previous works undertaken;
- (ff) arrangements for providing independent 4-stage clearance, are we arranging

- analytical via our approved contractors, how will records be provided to the Trust;
- (gg) what are the arrangements for handling unavoidable changes to the original plan, the Responsible/Appointed Person must be contacted if it is a major amendment to the original approved plan of works.

This is purely a guide and is not meant to be exhaustive, further information specific to the premises, location and environment may also need to be included.

The plan should give a true reflection of how the work is going to be undertaken and would be of good use to include detailed sketch plans and photos to assist in transmitting information.

All persons involved in the works must read and fully understand and it will be the appointed removal contractor's responsibility to ensure this is complied with.

3.3 Notification (Regulation 9)

Part of the licence obtained by the licensed removal contractor is a condition requiring 14-day notification of work to enable the enforcing authority (HSE) to make whatever arrangements they consider necessary to monitor the performance of the licensee. The Trust's Responsible/Appointed Person in control of the work must ensure that the contractor has issued the notification to the HSE and that copy is obtained for the job records. See appendix 5 for further information.

If the original notified works change then the licensed company may require additional information to be submitted to the HSE, such as if an extension to the timescale is required or further materials discovered. We will require the licensed contractor to follow the conditions of their licence and follow the guidance within ALG memo 02/12 with regards to changes from the original submitted ASB 5.

Where non-licensed works are required the appointed contractor needs to identify if it is non-licensed works or notifiable non-licensed works (NNLW) and carry out the work with the appropriate controls and documentation in place.

We expect our contractors to understand what is required in all levels of works and apply CAR as applicable to the works.

Notifiable non-licensed works will require the following additional requirements:

- (a) notify work with asbestos to the relevant enforcing authority;
- (b) ensure medical examinations (NNLW medicals required 3 yearly) are carried out; and
- (c) maintain registers of work (health records).

When requested to undertake non-licensed works the appointed contractor will need to risk assess the particular materials to determine whether it falls into the NNLW category by considering the following:

- (a) Friability of the material - the more friable a material is, the more likely it will release asbestos fibres when worked on and the greater the risk of exposure. Work which disturbs more friable materials e.g. asbestos insulation and AIB will tend to be NNLW (depending on condition), and work which disturbs the least friable materials e.g. asbestos cement can normally be treated as non-licensed work.

- (b) Is the asbestos firmly bonded in a matrix - this includes ACMs where the asbestos is coated, covered, or contained within another material, such as cement, paint, or plastic. ACMs of this type in good condition can usually be treated as non-licensed work but where they are significantly damaged, and so more likely to release fibres, they will need to be treated as NNLW.

The assessment must include the condition of the material and how it may be disturbed and the possibility of breakage during the works and after the assessment the works fall into the NNLW category a notification must be sent to the relevant authority (HSE for hospital works) using the online notifications form ASBNNLW1, prior to starting the work.

There is no minimum notice period, so the notification can be done on the same day of starting the works. No permission to commence is required, but a copy of the pdf submission will be received via email and we request a copy to be kept on site for further reference.

A site-specific plan of works is still required for all NLW and NNLW and referenced to the relevant HSG 210 guidance sheets, which must be available on site for reference, if applicable.

The HSE have formulated a table to assist in the decision-making process called the illustration of categories of work and further reference can be made to the flow chart provided in a0 of HSG 210. See appendix 9 and 10 for further reference on HSE guidance on where types of works should be defined to assist in ensuring our contractors are placing the works in the correct work categories.

3.4 Waiver to the 14-day notification period

A shorter time to the 14-day licensed notification period may be granted under exceptional circumstances and still must be agreed with the appropriate Enforcing Authority before works can commence, these are known as waivers. These will only be granted if the HSE define it as a genuine emergency or equally pressing reason.

If such an emergency occurs, then we will assist the licenced contractor as far as possible to enable the HSE to have all the necessary information required to make an informed decision.

We will be required to provide a written confirmation to support the request as to why the Trust consider it to be an emergency or equally pressing reason, and why we are requesting the licensed contractor to undertake the works without waiting for the 14-day period.

Examples of such situations which may occur on the Trust premises that may require a waiver could include:

- (a) where there is an imminent risk to health of staff or patients, particularly where patients cannot be easily relocated;
- (b) imminent risk to the environment which may cause spread to other areas of the hospital;
- (c) where there is public alarm to the risk from asbestos and the risk cannot be avoided simply by leaving the area, such as unable to move sensitive patients;
- (d) areas of the hospital that cannot be sufficiently sealed off as it will cause major problems;

- (e) cases where although we have done everything reasonably practicable to identify the presence, something has been missed that to delay for 14 days will cause problems for the hospital;
- (f) where the breakdown of hospital plant or equipment requires urgent remedial action as it may cause serious repercussions;
- (g) where there is or is liable to be worry or hardship for the old or infirm persons or patients.

In an emergency a waiver may be granted based upon telephone notification. However, this must be followed by the paperwork required to be submitted to the HSE as soon as is practicable, all of this will need to be managed by the licensed asbestos removal contractor with our assistance.

3.5 Site clearance certification for reoccupation and other air monitoring (Regulation 17 and 19)

All air monitoring requirements must be to ISO 17020 and a UKAS accredited company will be appointed.

The HSE recommends that the client (UHBW) appoints the analytical company where possible to ensure that impartiality and independence is maintained, therefore the Trust have approved UKAS accredited contractors to undertake all air monitoring as required.

There is a duty to ensure that on completion of the works and removal of any enclosures from site, that the area left is suitable for reoccupation. The Trust will require receipt of a reoccupation certificate prior to the contractor leaving site.

The contractor must apply all that is required to enable the appointed UKAS accredited analytical company to complete their inspection and clearance.

For all licensable works then we require a four-stage clearance procedure to be completed and copies provided.

Following successful analysis and completion of the four stages of the clearance process a certificate of reoccupation must be issued, declaring the area fit for use by the Trust. No unauthorised person should enter this area until this has been completed.

We expect all analysts who enter and exit enclosure areas to follow decontamination procedures appropriate to the risk and as defined in HSG 248 second edition and not cause any risk of spreading asbestos contamination to other areas of the Trust.

For NNLW we may require some backgrounds and reassurance monitoring depending on its location and the surrounding environment. The Responsible/Appointed Person for the area will define if this is required and what frequency we expect to be undertaken.

Before a DCU can leave site, it must receive an air clearance to the shower and dirty compartments, which the removal contractor must liaise with the analyst to ensure this is undertaken as required.

If the DCU is set up on site for a long contract we expect the contractor to undertake at least once a week air monitoring of the DCU to ensure that it is being maintained to a high standard, copies of each certificate must be kept on site for verification.

When a DCU is to be set up on the Trust premises we expect the last air clearance from the previous contract to be with the unit, this is a legal requirement and the unit should not have travelled by road without it.

3.6 Disposal of asbestos (Regulation 24)

Any asbestos waste material needing disposal from the Trust premises must only be removed and carried by EA waste carrier licence holder/s and have procedures in place to dispose of the waste in a safe and compliant manner, and at the correct facilities to accept the waste.

All asbestos waste must be suitably bagged using the approved double bagging procedure with a minimum of 1000 gauge coverage, using red waste bag at 500 gauge, placed in clear waste bag at 500 gauge, both being sealed and applying HSE guidance appropriate to the type of works being undertaken. Alternatively large items may be wrapped directly in 1000 gauge poly, tape sealed, and labelled as appropriate to the waste being packaged, this must be defined within the plan of works applicable to the waste.

Under NO circumstances must any employee of the Trust dispose of any asbestos material via an alternative waste stream used by the Trust.

Inspections shall be carried out and recorded to ensure that waste asbestos materials or items contaminated with asbestos are:

- (a) properly identified;
- (b) bags are properly sealed when moved around the Trust premises;
- (c) stored properly in sealed and lockable container whilst waiting to be moved from site with correct sign displayed;
- (d) the any areas are clearly segregated from other operational areas and this area is secure.

Waste areas on site are to be pre-agreed with the Responsible/Appointed Person and when under the control of the removal company, maintained to a high standard and all the waste they generate must be disposed of correctly and are not permitted to use any Trust non-asbestos bins or skips.

Copies of all the consignment notes for each load are to be copied to the Trust via the Responsible/Appointed Person and retained on file for a minimum of 3 years.

When hazardous waste is moved it must be accompanied by correctly completed paperwork called a consignment note. The note must be prepared before it's moved. To be valid the consignment note must include all the information fields and be as near as possible to the format example provided by the EA, see appendix 10 for example.

When small bag waste is being moved around the Trust premises, wheelie bins can be used as an overpack whilst transporting through site, these should be suitable for the task and correct signage displayed, such as example shown.



We must not accept any consignment note if:

- (a) information fields are missing or have been altered to reduce/change what is required, e.g. contact details or weight is missing;
- (b) declarations that are worded differently;
- (c) the format is different - e.g. it does not have separate tables in Part B and E

Waste moving between England and Wales must apply the same following procedures.

3.7 Verifying completed consignment notes

When a consignment note is handed to us it must have all 5 parts (A to E) completed, but during the process each part must be filled out in a particular order, by the right person, at the right time as per the following.

Step 1: producer or holder completes parts A and B

The producer or holder of the waste must complete parts A and B on each copy of the note before the waste is removed and give all copies to the carrier.

Part A: notification details

They must provide details of the origin and destination of the waste in Parts A1 to A4.

A1. Consignment note code

- (a) A unique consignment note code must be used and is valid for one consignment only. The format for the consignment note code must be 'XXXXXX/YYYYY':
- (b) where 'XXXXXX' is the first 6 letters/numbers (not symbols or spaces) of the name of the company entered in part A2 of the consignment note, followed by
- (c) '/' and then
- (d) 'YYYYY' which is exactly 5 numbers or letters (not symbols or spaces) which they choose to produce a unique code for that collection. For example, GLOBAL/00001 and so on thereafter.

Note: If the company name has less than 6 letters/numbers they must assign the letter 'Q' to remaining characters.

They must also assign an additional letter at the end of the consignment note code for certain types of consignment, such as:

- (e) an 'F' to any fly-tipped waste removed from our premises - 'XXXXXX/YYYYYF'
- (f) a 'D' to waste moving under a consignee return derogation - 'XXXXXX/YYYYYD'
- (g) a 'P' to continuous piped waste, if applicable to asbestos contaminated water, if so further information must be sought on correct methods to be applied.

A2. The waste described below is to be removed from (name, address, postcode, telephone, email)

They must enter all the required details for the premises from which the waste is being removed, which must include our full postcode, telephone, email, as appropriate to the location.

A3. The waste will be taken to (name, address, and postcode)

They must enter the name, address, and postcode of the place our waste is to be taken to (the consignee). They must first check that the consignee holds an environmental permit, or exemption from a permit, that allows them to accept the type(s) of waste being consigned from our premises, before it leaves site.

A4. The waste producer was (if different from A2) (name, address, postcode, telephone, email, facsimile)

This field is important if the waste was not produced by us, e.g. if the waste was produced by another contractor or organisation working on parts of premises but not directly linked to the Trust.

It must have completed either one of these - enter:

- (h) 'as A2' if the producer is the same;
- (i) details of the waste producer if different from that in A2.

Part B: description of the waste

They must provide information about the waste, the activity that produced it, its composition, properties, and its packaging in Part B1 to B3.

B1. The process giving rise to the waste and B2 SIC for the process giving rise to the waste

They must provide a full written description and the Standard Industrial Classification as per SIC 2007 code of the process that created the waste. If for any reason, they move waste produced by more than one process, they must use the SIC code and description of the process that produced most of the waste, which for this plan would be asbestos removal.

For any construction and demolition asbestos category waste, the applicable code is 39.00 as an example.

B3. Waste details

For each different type of waste being collected they must enter details of the:

- (j) waste description: this must be a full description of each waste - the short description from the list of wastes (LoW) is not normally sufficient;
- (k) LoW or European Waste Catalogue (EWC) code 6 digits, which for the purpose of this plan would usually fall into one of the following categories;

Insulation and asbestos materials		
Waste type	Waste status	Waste code
Insulation containing asbestos	Hazardous	17-06-01
Other construction materials containing asbestos	Hazardous	17-06-05*
17 06 05* would normally be used in preference to 17 06 01 for asbestos in asbestos contaminated soil and stones.		

- (l) quantity (kg): they must provide the total weight in kg for each hazardous LoW code - the weight entered must be accurate, if they use conversion factors for volumes of liquids or containers they must ensure that they are reliable;
- (m) chemical/biological components of the waste and their concentrations: they must describe the chemical (or biological) composition of the waste including both hazardous and non-hazardous items;
- (n) physical form (gas, liquid, solid, powder, sludge or mixed): they must enter the one that best describes the waste, which for asbestos would be solid in most cases;
- (o) hazard code(s): they must identify which hazardous properties the waste possesses as per the following:
 - (i) The assessment of asbestos containing waste must consider both the

- presence of asbestos as fibres that are free and dispersed, and identifiable pieces of asbestos containing material. If the waste contains fibres that are free and dispersed then the waste will be hazardous, if the waste as a whole contains 0.1% or more asbestos.
- (ii) If the waste contains any identifiable pieces of suspected asbestos containing material, they must be assessed as follows. This would also apply to any dispersed fibres produced by deliberately breaking up such identifiable pieces.
 - (iii) Where the waste contains identifiable pieces of asbestos containing material (i.e. any particle of a size that can be identified as potentially being asbestos by a competent person if examined by the naked eye), then these pieces must be assessed separately. The waste is hazardous if the concentration of asbestos in the piece of asbestos containing material is 0.1% or more. The waste is regarded as a mixed waste and classified accordingly, further information must be sought.
- (p) container type, number, and size: they must enter if a larger container contains smaller containers of different hazardous wastes they must also enter this information for the smaller containers;
 - (q) UN identification number(s), proper shipping name(s), UN class(es), packaging group(s) and special handling requirements: this information is required for the transport of dangerous goods - further information is available from the HSE website as applicable.

Step 2: carrier checks parts A and B, and completes part C

The carrier must check parts A and B of the note, and complete part C after the producer or holder has completed parts A and B and before the waste is removed. Once they have signed part C they must hand all copies back to the consignor, i.e. the producer or holder.

Checking part A: waste details

The carrier must (as a minimum) do duty of care checks to confirm the waste details given by the producer/holder in Part B3 are correct and fully completed. They must not sign Part C (or remove the waste) if any of the details are incomplete or incorrect.

Checking part B: the journey

The carrier must confirm that they are collecting the waste from the premises listed in A2, and taking it directly to the destination listed in A3. The note is only valid for the journey shown.

Part C: carrier certificate

By completing Part C the carrier is doing 2 things. They are:

- (r) confirming they have checked the details provided by the producer/holder in Parts A and B
- (s) entering their own details

Entering vehicle and carrier details

The note is valid only for the carrier company using the specific vehicle indicated on the note. If more than one carrier or vehicle is used, they should use a carrier schedule. We can contact the EA on 03708 506 506 for more information if required.

Step 3: consignor checks parts A, B and C and completes part D

The consignor (producer or holder) must be present when the waste is collected by the

carrier. The consignor must confirm that the information the producer or holder entered into Parts A and B, and the carrier entered into Part C is all correct.

Part D: consignor's certificate - information they must confirm

Part D must be completed by the consignor after the carrier has completed Part C but before the waste is removed. The consignor must be present when the waste is collected. The carrier cannot complete Part D.

They must check and confirm each of the 6 points before completing Part D:

They must certify that:

- (t) the information in A, B and C has been completed and are correct - the person signing the note must have sufficient knowledge to certify this and be present when the waste is collected to check the carrier's vehicle registration number;
- (u) the carrier is registered - they must check that the carrier is registered. Find a registered waste carrier can be checked on the EA website;
- (v) They have been advised of the appropriate precautionary measures - they have a duty to give the carrier any precautionary measures needed for the waste material;
- (w) all of the waste is packaged and labelled correctly - and is in line with carriage of dangerous goods requirements for transport;
- (x) the carrier has been advised of any special handling requirements - they have a duty to inform the carrier of any special handling requirements

They must confirm that they have fulfilled their duty to apply the waste hierarchy as required by Regulation 12 of the Waste (England and Wales) Regulations 2011.

1. Consignor name - This must be the name of the person who supervises the carrier collection and signs the note.

On behalf of (name, address, postcode, telephone, email, facsimile) - If they are employed by the business listed in Part A2 of the note write 'as A2'. Otherwise provide the full address and contact details of the business that they work for.

Signature date, time - The consignor signs the note and enters the date and time (using 24-hour clock) of signing.

Step 4: the consignee receives the waste from the carrier

On arrival the carrier gives the consignee 2 copies of the note. The consignee:

- (y) checks the waste and the note and either accepts or rejects the waste;
- (z) completes part E to confirm they have checked the delivery of waste and whether it has been accepted or rejected;
- (aa) They may commit an offence if they accept a hazardous waste without a consignment note, or if the consignment note is incomplete or incorrect;
- (bb) They must check both the waste and its accompanying documentation to ensure it is correct and complete before they accept the waste;

Part E: consignee certificate - information they must provide

They must enter the:

- (cc) individual EWC code(s) received - check the waste is as classified and described in Part B then enters the code if correct - if the code in Part B is

- incorrect, they must reject the waste and provide an explanation under number 3.
- (dd) quantity of each code received (in kg) - weigh the waste or otherwise accurately determine the quantity they received in kg - and not to copy the quantity collected from part B;
- (ee) EWC code accepted/rejected - enter whether they accept or reject each code received;
- (ff) waste management operation - enter the waste recovery or disposal operation they will apply to the waste at their site using its R or D code.

When we receive waste consignment notes back to us as the producer, all the above points must be completed from A to E before filing. Any issues must be raised immediately to the appropriate contractor and followed up until action has been completed satisfactorily.

3.8 Document management

Due to the nature of managing asbestos and undertaking asbestos removal works, asbestos surveying and undertaking air monitoring requires a vast amount of paperwork to be collated.

It is important that all this documentation is managed to a high standard and all records are maintained in a safe place where they can be easily referenced.

The main document to manage is our asbestos register, as detailed in section 1.7, this will be freely available to those who require reference to it.

The licensed removal company will be required to supply all documentation as detailed in appendix 6 and we will need to ensure that this is stored in a safe place, protected from damp, wet, fire and other forms of damage. Where possible we will request that documentation is scanned by the removal company and presented in a completed site file for further protection.

All air monitoring records must be maintained for a period of 5 years, except where they are to do with exposure records or incidents of accidental exposure, they must be maintained for 40 years. These must be maintained in accordance with this section.

3.9 Asbestos Incidents & RIDDOR (Regulation 15)

All incidents involving ACM's must be reported and recorded in accordance with the Trust's incident reporting procedures policy, Procedure Template: Gov12 Document Number, SOP1 Rev 1. A copy of the incident report will be kept in the asbestos Incidents File, kept with the Responsible/Appointed Person.

All investigations related to asbestos incidents shall be undertaken by the Trust's Responsible/Appointed Person, a copy of the investigation report is to be kept with the incident report, and copies sent to the Divisional Director & Health & Safety lead on completion of investigation.

With regards to the asbestos removal contractors, they must have their own emergency arrangements for their works to ensure compliance with regulation 15 of CAR 2012. A copy of their procedures and necessary equipment to facilitate identified potential emergencies arrangements must be available and set up on site.

If the incident has resulted in the release of asbestos, then the emergency procedure should be undertaken. See section 4.5.

With regards to whether an accidental exposure is due to be reported under RIDDOR Schedule 2, the following would need to be assessed.

The Reporting of Injuries, Diseases, and Dangerous Occurrences Regulations 2013 (RIDDOR) places duties on employers, the self-employed and people in control of work premises (the responsible person) to report certain serious workplace accidents, occupational diseases and specified dangerous occurrences (near misses).

In the RIDDOR 2013 schedule 2, part 2 'Hazardous escapes of substances', defines the following:

'The unintentional release or escape of any substance which could cause personal injury to any person other than through the combustion of flammable liquids or gases.'

HSE FAQ section with regards to RIDDOR and asbestos under RIDDOR 2013 indicates the below:

'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.'

Therefore, such situations that are likely to arise when work is carried out without suitable controls, or where those controls fail could often involve one or a combination of the following:

- (a) use of power tools (to drill, cut etc.) on most ACMs;
- (b) 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, asbestos insulating board (AIB);
- (c) manually cutting or drilling AIB;
- (d) work involving aggressive physical disturbance of asbestos cement e.g. breaking or smashing

If any of these activities have been carried out, without suitable controls, or the precautions fail to control exposure, these would be classed as a 'dangerous occurrence' under RIDDOR and must be reported. Each case would have to be assessed on an individual basis and if further guidance is required we will contact a competent company or person for specialist advice.

If an incident has occurred, then we must review our asbestos management plan and/or our working practices to identify where failures may have occurred and put in place the necessary action to reduce the potential of this happening again.

3.10 Procedure for previously unidentified ACM's

It is the responsibility of all persons, staff or contractors to report any findings where they believe they have discovered or uncovered a material suspected of being or containing asbestos. This must be reported to the Responsible/Appointed Person as soon as practicably possible, the Responsible/Appointed Person shall then take charge of the situation and take appropriate actions to identify, contain and/or remove the ACM's appropriately. Previously unidentified ACM's are to be added to the Asbestos Register, as per section 1.7, for future reference even if removed.

If the incident involves the discovery and disturbance and damage has occurred, then refer to section 3.11 below and ensure that section 4.5 has been followed by the persons involved.

3.11 Accidental release of asbestos (Regulation 15)

It is the responsibility of all staff to report any damaged ACM to the Responsible/Appointed Person via the quickest possible means after taking any immediate action to make the area safe.

If anyone suspects that an ACM has been disturbed or damaged, then they must refer to section 4.5 for the step by step flowchart on which all persons should be trained and applying the additional following points to the incident where applicable:

- (a) Evacuate the room/vicinity immediately, without causing alarm (Discuss with the relevant person/s, if requires the possible closure of a department or ward);
- (b) Cordon/lock off the area if safe to do so until a full assessment has been completed (close doors);
- (c) Contact the Responsible/Appointed Person who will take charge of the situation and carry out the assessment;
- (d) Responsible/Appointed Person shall determine action to be taken.

If the risk of exposure is genuine then further action that may be required, this action will be determined by the Responsible/Appointed Person:

- (a) Reinforce room/area closure;
- (b) UKAS approved analyst requested to attend site as soon as possible prepared to undertake air tests;
- (c) Consult the relevant asbestos register to determine type of suspected asbestos;
- (d) When the analysts have arrived on site, get them to set up background/perimeter air sampling to determine extent / severity of damage;
- (e) Arrange clear up of debris/damaged ACM with approved asbestos removal contractor, see section 3.3 with regards to notification procedure and whether waiver could be applied for;
- (f) Identify all those persons involved, establish duration of exposure. This coupled with asbestos type and exposure level will determine their risk, and possible referral to Occupational Health, see section 3.9 for possibility of RIDDOR report following investigation by Responsible/Appointed Person;
- (g) Referral to Occupational Health Department for anyone who may have been exposed to high levels of exposure;
- (h) Exposed individuals will be advised to inform their GP so note can be made in their medical records.

3.12 Health surveillance (Regulation 22)

If employees or others are believed to have been exposed to asbestos they may be understandably anxious and concerned about the possible effects on their health. Many cases of inadvertent, short-term exposure to asbestos will most likely have led to minimal exposure to fibres, with little likelihood of any long-term ill health effects. Although the type of asbestos involved, and duration of exposure may be known, there may be little reliable information about the level of exposure.

These are all important factors in determining the level of risk, as the more fibres that are released by an asbestos-containing material, and the longer the work activity lasted, the greater the cumulative exposure to asbestos fibres and, therefore, an increased risk of ill health effects.

All employees who report a concern that they may have been inadvertently exposed to asbestos shall be required to report immediately to the 'Responsible/Appointed Person' after ensuring that the accidental damage procedure section 4.5 has been applied. This will result in a record being maintained within their employee personnel file with regards to the information obtained at the time of suspected exposure.

Any non-employee should be advised to contact their GP for similar guidance and maintenance of such records, should such an incident be reported.

All employees, if applicable, who have been trained, face fitted and authorised to undertake notifiable non-licensed works will be referred to the occupational health department to have the required non-licensed medical surveillance. This will be required to repeated at least 3 yearly to ensure compliance.

On completion of the health surveillance the examining doctor shall issue a certificate to the Trust and employee stating an examination has been completed and the date of the examination. The occupational health department will ensure that each employee's records are kept for 40 years.

3.13 Environmental monitoring (Regulation 19)

Only analysts accredited by UKAS will be permitted to carry out any air monitoring required and will be contracted for the following:

- (a) Carry out asbestos air sampling;
- (b) Collect and analyse bulk samples;
- (c) Carry out 4 stage clearance procedures.

All areas of known asbestos containment must be monitored following a change to the condition of the ACM (i.e. damage).

All reports indicating an increase in the presence of asbestos contamination must be actioned immediately and entered into the asbestos register. If the analysts at any time indicate high levels, then the Responsible/Appointed Person for the area in question must make an immediate assessment of what course of action to take.

4. Asbestos training (Regulation 10)

Training must be undertaken to ensure compliance with regulation 10 of CAR applicable to the works being undertaken and the following sections will define the required training.

To ensure that the general running of our premises and service is not affected, training sessions for trust employees will be organised accordingly. Training sessions will be arranged with the relevant parties agreeing suitable dates and times so as to ensure that all persons are covered.

4.1 Asbestos awareness

Training requirements imposed by regulation 10 of the Control of Asbestos Regulations 2012, place a duty to ensure that persons who are liable to disturb asbestos while carrying out their normal everyday work, or who may influence how work is carried out, such as: General maintenance staff, electricians, plumbers, gas fitters, painters/decorators, joiners, plasterers, demolition/construction workers, roofers, heating/ventilation/telecommunication engineers, fire/burglar alarm installers, computer installers, architects, building surveyors and other such professionals and shop fitters, must receive asbestos awareness training as a minimum.

This course does not cover any element of removal, painting, drilling into or repairing ACMs materials, it is purely to give awareness.

It is the duty of the Trust to provide Asbestos Awareness training to its employees that are likely to be working in close proximity to Asbestos Containing Materials (ACMs). The purpose of the training is to alert those who work in our premises, which are known to contain ACMs and make them aware of the facts and dangers of asbestos. The Trust recognises the importance of third party verification of training providers and will source UKATA or IATP approved training providers to ensure good standards are maintained.

This training is provided to raise awareness of the problems and hazards associated with working near asbestos and the control procedures necessary to protect against exposure to air borne asbestos fibres.

Asbestos awareness training should cover the following topics with additional bespoke information added with regards to the Trust policies and procedures:

- (a) the properties of asbestos and its effects on health, including the increased risk of lung cancer for asbestos workers who smoke;
- (b) the types, uses and likely occurrence of asbestos and ACMs in buildings and plant, particularly relevant to the products identified in our Trust premises;
- (c) the general procedures to be followed to deal with an emergency, e.g. an uncontrolled release of asbestos dust into the workplace, who to contact in an emergency, see section 3.9 which should be incorporated;
- (d) how to avoid the risks from asbestos, e.g. any works within the Trust premises, no employee should carry out work which disturbs the fabric of the building unless the employer has confirmed that ACMs are not present and checked our asbestos register;
- (e) If management in attendance, then additional information on regulation 4 on the duty to manage asbestos in non-domestic properties, such as the Trust buildings including bespoke information on our asbestos management plan will need to be added to a longer course structure.

4.2 Management training

With the Control of Asbestos Regulations 2012, the Health and Safety Executive produced an Approved Code of Practice (ACoP) to accompany the Regulations, L143 second edition. The Trust has interest in Regulation 4 of the ACoP as it deals with the Duty to manage asbestos in non-domestic premises as mentioned above in the awareness, but selected staff may need an additional course on the specifics to ensure compliance. This may include more detailed training on L143 second edition and additional guidance on the managing of asbestos in our premises, either via bespoke courses or attending

recognised training providers.

Responsible/Appointed Person must attend and complete the additional courses on the management of asbestos in buildings, prior to their appointment, which must continue with appropriate refresher training as deemed necessary to keep up to date with current and changing legislation and industry best practice. Information gained from these training sessions will be kept with all asbestos records, to create an asbestos information library.

Estates Maintenance Staff, House keepers, Porters and their Managers are required to attend Asbestos Awareness Training which will be refreshed annually. This will be conducted by the appointed training provider to deliver the initial training course and then backed up with annual refreshers given by the Responsible/Appointed Person for the first and second year, followed by a third year approved full class based training and continue thereafter.

Newly employed staff will receive training within 1 month of starting on site, until that time they will be supervised by a competent person at all times who has already received the appropriate training.

Contractors and other external workers who are likely to be working alongside ACM's, must arrive on site with suitable approved training by UKATA or IATP and a copy of their relevant training certificate produced for verification, see section 4. This will be further backed up with a site-specific induction given by the Responsible/Appointed Person relevant to the area of works.

For long duration projects we require toolbox talks to be delivered regularly to keep persons reminded of the risk asbestos poses whilst working at our premises and other relevant topics to the works being undertaken.

Records of training for all Trust staff will be kept by the Compliance Manager-Estates and recorded in their individual personnel files.

4.3 Contractors - Licensed and non-licensed

Where licensed or other contractors are appointed to undertake works on Trust premises, the companies must have trained their employees to the required standards and in compliance with regulation 10 of CAR.

For non-licensed, the training is laid down in ACoP 243 and 244 of L143 second edition and all persons must have completed asbestos awareness before proceeding to be trained in non-licensed removal.

They must have a minimum of a qualitative face fit for the half mask disposable or fitted half mask that they intend to be wearing. If undertaking notifiable non-licensed works (NNLW) they must have had a non-licensed asbestos medical and then continue with repeated medicals every 3 years thereafter, copies of these should be requested for verification.

For licensed contractors, their employees must be trained to the high standards laid down in ACoP L143 section 251 for all operatives, supervisors, managers, and directors, with the further additions in section 252 for all supervisors, managers and directors with the practical elements covered in section 253 covered for all levels.

All training for licensable and non-licensable work must be refreshed every year or more frequently if:

- (a) work methods change;
- (b) the type of equipment used to control exposure changes;
- (c) the type of work carried out changes significantly; or
- (d) gaps in competency are identified.

It is up to the employer of the appointed contractors to ensure their competency is assessed as required to ensure good standards are maintained at all times and they conduct the required training needs analysis. If during a Trust audit, standards are identified that are not acceptable then the company will be contacted for immediate action to be taken. Failure to provide verification of the correct level of training will result in the contractor to cease works until the confirmation is provided.

4.4 Contractors - Analytical, surveying and consultancy

For all other asbestos professionals whose services may be employed by the Trust, the employers must provide the necessary good standards of training to ensure that the persons they provide to our site are trained and competent to undertake the works they have been instructed to do.

The companies must keep up to date with legislation changes and ensure that when consulted for advice and guidance, it is given in accordance with current legislation, ACoPs and guidance.

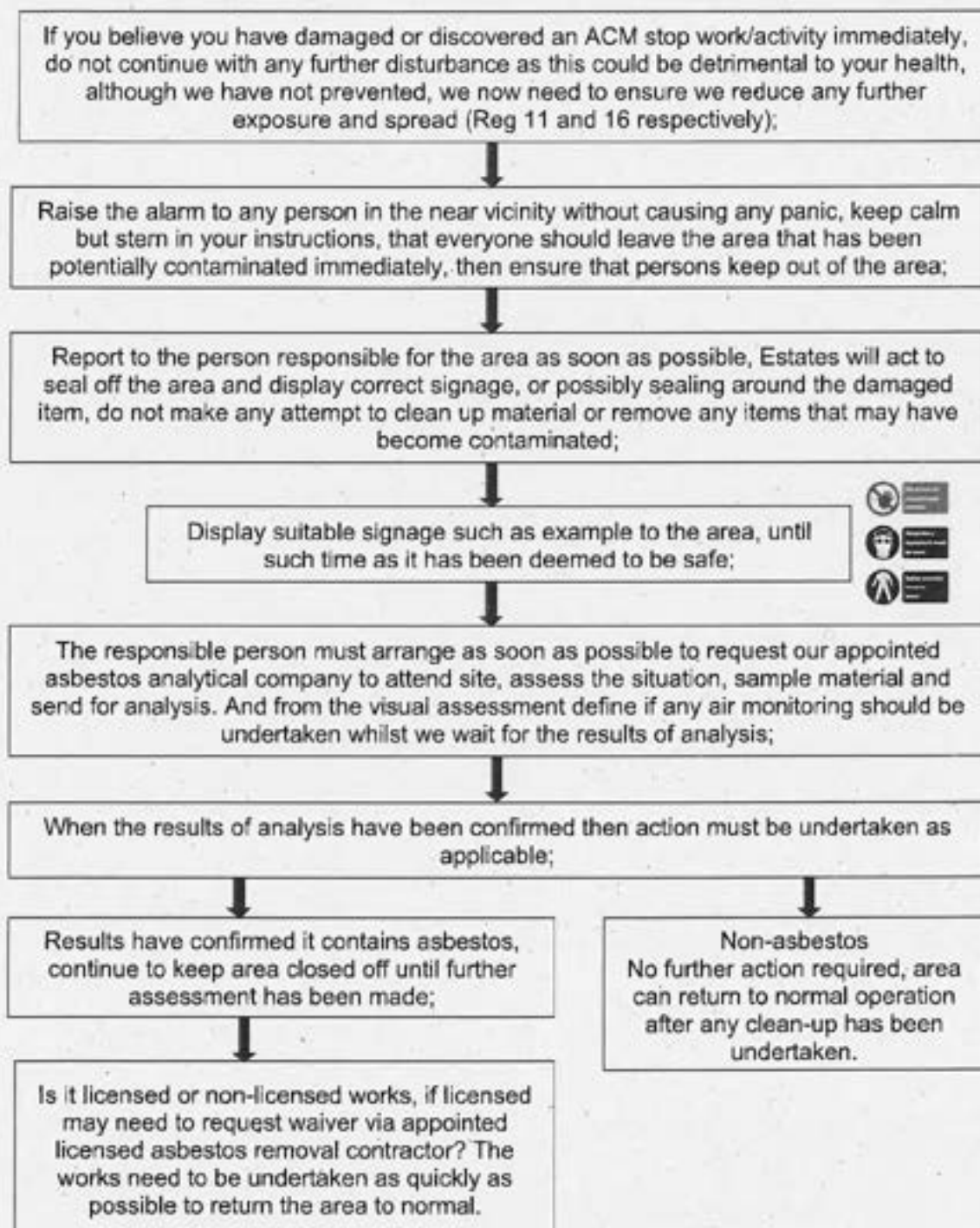
All analytical works must be undertaken by UKAS accredited companies, who have trained and competent persons who have also kept up to date with legislation changes and undertake their works in accordance with current legislation, ACOPs and guidance.

If during a Trust audit, standards are identified that are not acceptable. Then the company will be contacted for immediate action to be taken.

4.5 Accidental damage procedure training

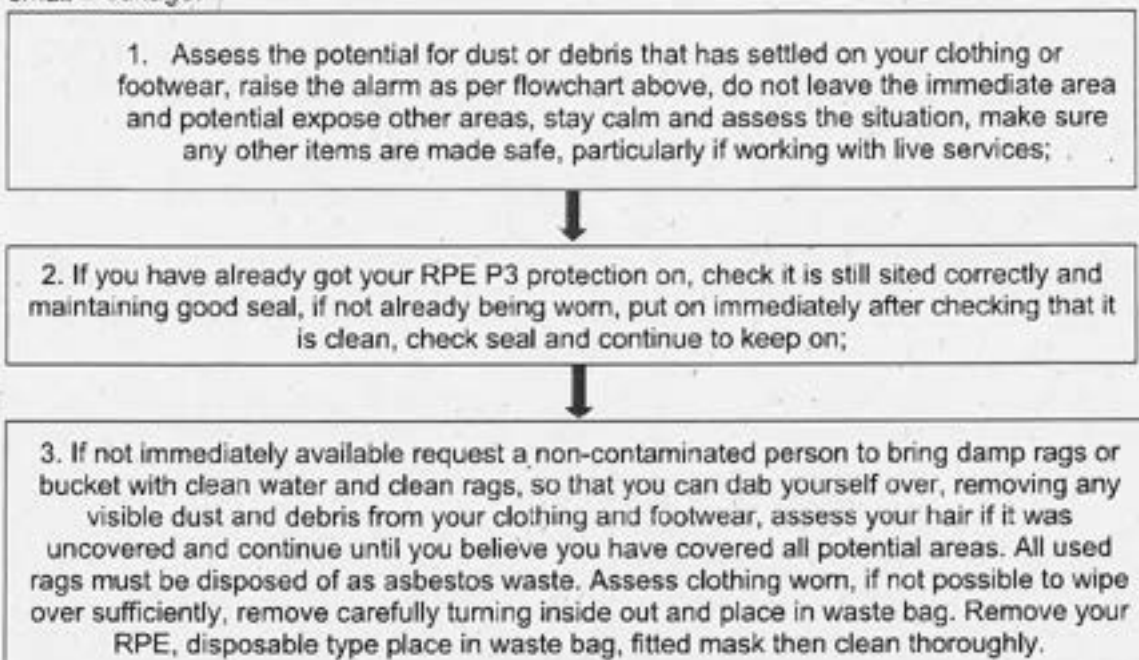
All staff/contractors are required to notify estates of any damage, where they believe it may be an ACM or where it has disturbed an ACM, or if a void has been opened with suspect contamination or where an ACM is suspected to be present. This needs to be notified to the Responsible/Appointed Person to the area affected for further assessment as soon as it is safe to do so.

The following flowchart will be required to be covered in a training session for all personnel where there is a risk that they may come into contact with asbestos and should be included in all asbestos awareness courses, see section 4.1.

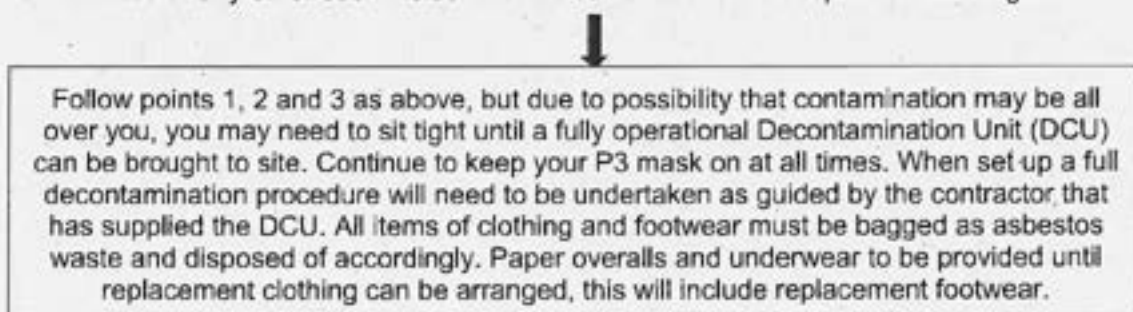


As the flow chart above is being followed through, the persons who may have been potentially exposed to asbestos need to be following the next flowcharts, dependant on the level of contamination to the individuals involved, to ensure that we can reduce their exposure and stop any further spread of asbestos.

The first flowchart is for minimal damage such as small drilling incident into material for a few seconds where it has resulted in colour change, minor damage to a panel or board, small crack, small breakage.



The second flowchart is for more severe damage such as access to heavily contaminated void, severe physical damage to asbestos lagging or sprayed coating, drilling into AIB for more than a few minutes or any other such incident where contamination is suspected to be high.



4.6 Additional requirements to assess after such an incident:

Are tools and equipment that were in the work area contaminated or can they be suitably cleaned, this will need coordinating with the appointed analytical company?

Do we need to carry out any background/perimeter air monitoring and reassurance air monitoring to the surrounding areas, this will need coordinating with the appointed analytical company?

Does the incident require a RIDDOR report to be completed as a dangerous occurrence, see section 3.9 for further information?

Records of exposure need to be maintained for 40 years and persons referred for

health surveillance; see section 3.12 for further information. Follow up report to identify where failures may have occurred, bring in immediate action to reduce the risk of it happening again.

Review management plan as applicable.

5. Reference documents

There are a large number of official publications relating to asbestos and general health and safety requirements. The following list contains the most significant and relevant items, but is not exhaustive as updates and legislation changes may occur after the revision of this document. It will be the duty holder's role to ensure they monitor legislation changes and update the document list as appropriate.

We will ensure that all works, management and general reference with regards to asbestos is made to the following asbestos specific documents where applicable:

1. Control of Asbestos Regulations 2012 (CAR)
2. ACoP Managing and working with asbestos L143 second edition
3. HSG53 Respiratory Protective Equipment at Work: A practical guide (fourth edition)
4. RPE Face fit guidance OC 282/28
5. HSG210 Asbestos Essentials – Task manual 2017
6. HSG 247 Asbestos: Licensed Contractors Guide
7. HSG 248 Asbestos: The Analysts Guide second edition
8. HSG 264 Surveying, Sampling, and Assessment of Asbestos Containing Materials
9. The Hazardous Waste Regulations 2005 & amendment 2009
10. Carriage of Dangerous Goods & Use of Transportable Pressure Equipment Regs 2009
11. The Waste (England & Wales) Regulations 2011, & amendment to regulation 13 - 2012
12. BS 8520-1:2009 Controlled Wetting of Equipment
13. BS 8520-1:2009 Negative Pressure Unit: specification
14. BS 8520-1:2009 Operation, cleaning & maintenance of class H, vacuum cleaners
15. ALG Memo 01/09 Maintenance of air extraction equipment and Class H vacuum
16. ALG Memo 02/09 Asbestos Licenses and the role of consultants
17. ALG Memo 01/10 Ancillary asbestos licences for scaffolding
18. ALG Memo 03/12 Removal of External AIB soffits
19. ALG Memo 07/12 Notification of licensed asbestos works
20. ALG Memo 07/12 Site Documentation
21. ALG Memo 04/12 Suitable and Sufficient Plan of Works
22. ALG Memo 05/12 Supervision of licensed work
23. MS 31 Medical guidance for Doctors – licensed workers
24. MS 34 Medical guidance for Doctors – non-licensed workers
25. Appendix 4-15 Other Trades entering enclosure/asbestos work areas
26. Appendix 1-17 Asbestos Ventilation Research Summary
27. Appendix 2-17 Asbestos in Soil
28. Appendix 3-17 Work with Asbestos Paper
29. Appendix 4-17 Dust Wipe Sampling
30. Appendix 5-17 Guidance on AIB Soffit Removal
31. Appendix 6-17 Abrasive Blasting Removal Systems
32. Appendix 2/19 Measuring the inward Air Flow of a Negative Pressure Unit
33. Appendix 1a-21 Asbestos Cleans (Environmental Cleaning)
34. Appendix 01/22 Non Asbestos Risk Assessment
35. Appendix 01-22 Decontamination Unit (DCU) Services (Gas and Electrical)

We will ensure that all works, management and general reference with regards to all other health and safety duties is made to the following specific documents where applicable:

1. Health & Safety at Work Act 1974 (as amended)
2. Construction (Design & Management) Regulations 2015 – ACOP L153
3. Confined Space Regulations 1997 & ACOP L101
4. Control of Substances Hazardous to Health Regulations 2002 & ACOP L5
5. Electricity at Work regulations 1989 (amended 1997) & ACoP L128
6. The Gas Safety (Installation and Use) Regulations 1998 & ACoP L56
7. HSG 140 Safe use and handling of flammable liquids
8. Environmental Protection Act 1990
9. Fire Regulatory Reform Order 2005
10. Health & Safety (Safety, Signs and Signals) Regulations 1996 & ACoP L64
11. Health and Safety (First Aid) Regulations 1981 & ACoP L43, L74
12. The Health and Safety (Consultation with Employees) Regulations 1996
13. Dangerous Substances and Explosive Atmospheres Regulations 2002
14. Lifting Operations and Lifting Equipment Regulations 1998 & ACoP L113
15. The Provision and Use of Work Equipment Regulations 1998 & ACoP L22
16. Management of Health & Safety at Work Regulations 1999
17. The Working Time Regulations 1998
18. Manual Handling Regulations 1992 & ACoP L23
19. Personal Protective Equipment at Work Regulations 1992 ACOP L25
20. Reporting of Injuries Disease & Dangerous Occurrences Regulations 2013
21. Workplace (Health & Safety & Welfare) Regulations 1992 & ACOP L24
22. Working at Height Regulation 2005 & guidance
23. Control of Vibration at Work Regulations 2005 & L141
24. Control of Noise at Work Regulations 2005 & L108
25. Chemicals (Hazard Information & Packaging for Supply) Regulations 2009
26. Corporate Manslaughter Act 2007
27. Control of Lead at Work Regulations 2002 & ACoP L132
28. Health and Safety (Display Screen Equipment) Regulations 1992 & INDG 36
29. Health and Safety (Fees) Regulations 2012 & HSE 47 Fees for Intervention

6. Appendix 1 - Asbestos materials

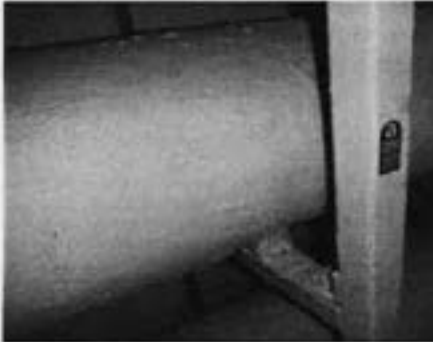
To assist in the identification of known ACMs the HSE have put together a list of materials and information of known content and approx. years of usage. It must be noted that this list is not exhaustive as asbestos was used in many strange processes and the Trusts Asbestos Register must always be consulted.

Material	Type
3-inch corrugated asbestos cement (AC)	white asbestos mostly; blue used until 1969, brown until 1980
6-inch corrugated AC	white asbestos mostly; blue used until 1969, brown until 1980
Artex	white asbestos
Asbestolux	blue asbestos used until 1965, then brown and white
Asbestos blanket	white asbestos
Asbestos caulking	blue asbestos used until 1970, then white
Asbestos cement	white asbestos mostly; blue used until 1969, brown until 1980
Asbestos cloth	any type used until 1965, then white asbestos
Asbestos felt	white asbestos
Asbestos gasket	blue and white asbestos
Asbestos gauntlet/glove	any type used until 1965, then white asbestos
Asbestos insulating board	blue asbestos used until 1965, then brown and white
Asbestos paper	white asbestos
Asbestos rope	blue asbestos used until 1970, then white
Asbestos string	white asbestos
Asbestos tape	white asbestos
Asbestos tile	white asbestos
Asbestos wallboard	blue asbestos used until 1965, then brown and white
Bigsix	white asbestos mostly; blue used until 1969, brown until 1980
Bitumen adhesive	white asbestos
Bitumen mastic	white asbestos
Brake, clutch composite	white asbestos
CAF or CAF-IT gaskets	blue and white asbestos
Canada tile	white asbestos mostly; blue used until 1969, brown until 1980
Caposil	brown asbestos
Caposite	brown asbestos
Cavity decking	white asbestos mostly; blue used until 1969, brown until 1980
Colourglaze	white asbestos mostly; blue used until 1969, brown until 1980
Combined sheet	white asbestos mostly; blue used until 1969, brown until 1980
Composites, reinforced	white asbestos, occasionally brown
Damp-proof course paper	white asbestos
Damp-proof course sealant	white asbestos
Diamond AC	white asbestos mostly; blue used until 1969, brown until 1980
Doublesix	white asbestos mostly; blue used until 1969, brown until 1980
Drive belt	white asbestos
Durasteel laminate	white asbestos
Effex	white asbestos mostly; blue used until 1969, brown until 1980

Emalie	white asbestos mostly; blue used until 1969, brown until 1980
Eternit slates	white asbestos mostly; blue used until 1969, brown until 1980
Everite (moulded product)	white asbestos mostly; blue used until 1969, brown until 1980
Everite slates	white asbestos mostly; blue used until 1969, brown until 1980
Ferroasbestos	white asbestos, occasionally brown
Floor tile - thermoplastic	white asbestos
Flooring - PVC	white asbestos
Fort	white asbestos mostly; blue used until 1969, brown until 1980
Friction product	white asbestos
Galbestos	white asbestos
Glasal AC	white asbestos mostly; blue used until 1969, brown until 1980
Glen six	white asbestos mostly; blue used until 1969, brown until 1980
Insulating board	blue asbestos used until 1965, then brown and white
JM slate	white asbestos mostly; blue used until 1969, brown until 1980
Klingerit	blue and white asbestos
LDR	blue asbestos used until 1965, then brown and white
Limpet	blue asbestos mixtures used until 1971, then brown and white
Lion jointing	blue and white asbestos
Magnesium oxychloride flooring	white asbestos
Major tile	white asbestos mostly; blue used until 1969, brown until 1980
Marblecoat	white asbestos
Marinite	blue asbestos used until 1965, then brown and white
Millboard	blue asbestos used until 1965, then white
Monad	white asbestos mostly; blue used until 1969, brown until 1980
Newtex	white asbestos
Novilon	white asbestos
Novilon flooring	white asbestos
Panel sheet	white asbestos mostly; blue used until 1969, brown until 1980
Partition board	blue asbestos used until 1965, then brown and white
Pax-felt	white asbestos
Pebblecoat	white asbestos
Permanite	blue and white asbestos
Poilite	white asbestos mostly; blue used until 1969, brown until 1980
Promenade tiles	white asbestos mostly; blue used until 1969, brown until 1980
PVC reinforced	white asbestos
Rock wool	Not asbestos material but may contain traces of asbestos contamination
Roofing felt (Some)	white asbestos
Sealant dpc	white asbestos
Serval	white asbestos
Serval asbestos flooring	white asbestos
Shipboard	blue asbestos used until 1965, then brown and white
Siluminite	white asbestos, occasionally brown
Sindanyo	white asbestos, occasionally brown
Speakers slates	white asbestos mostly; blue used until 1969, brown until 1980

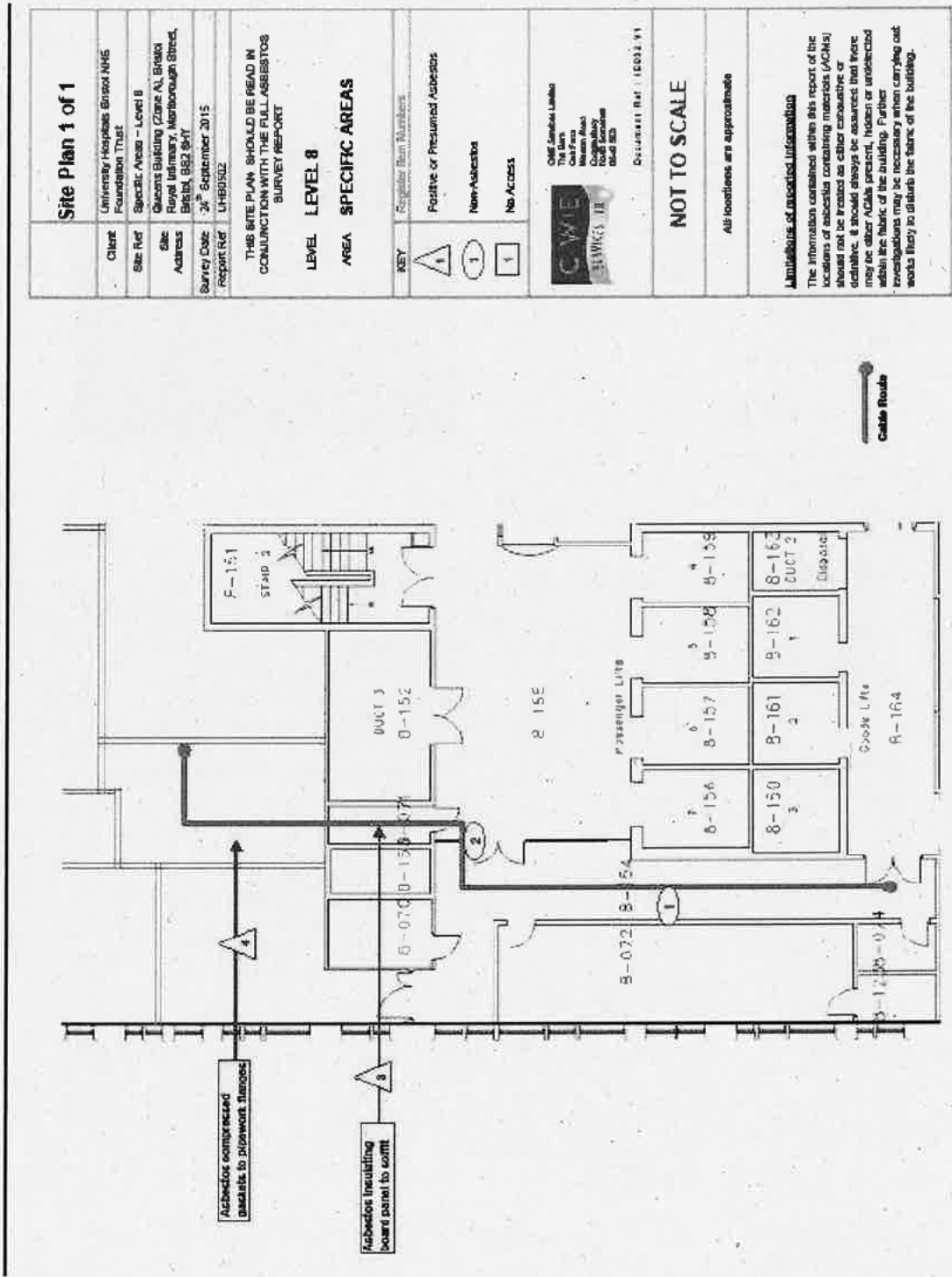
Spray coating	blue asbestos mixtures used until 1971, then brown and white
Storage heaters	Some storage heaters contain asbestos
Supalux	not asbestos material but may contain traces of asbestos contamination from materials manufacturers 1985, 1986, 1987
Supersix	white asbestos mostly; blue used until 1969, brown until 1980
Suretex	white asbestos
Thrutone	white asbestos mostly; blue used until 1969, brown until 1980
Trafford tile	white asbestos mostly; blue used until 1969, brown until 1980
Troughsec	white asbestos mostly; blue used until 1969, brown until 1980
Turnall (moulded product)	white asbestos mostly; blue used until 1969, brown until 1980
Turnall slates	white asbestos mostly; blue used until 1969, brown until 1980
Turnasbestos	blue asbestos used until 1965, then brown and white
Turners slates	white asbestos mostly; blue used until 1969, brown until 1980
Twin twelve	white asbestos mostly; blue used until 1969, brown until 1980
Viceroy foiled paper	white asbestos
Vinyl asbestos tile	white asbestos
Wall board	blue asbestos used until 1965, then brown and white
Weatherall	white asbestos mostly; blue used until 1969, brown until 1980
Wondertex	white asbestos
<ul style="list-style-type: none"> • White asbestos: chrysotile, serpentine; • Brown asbestos: amosite, amphibole; • Blue asbestos: crocidolite, amphibole. 	

7. Appendix 2 - Sample of asbestos register, example of report sheet

EstateManager		Asbestos Material & Priority Risk Detail Report	
Survey ID: U460211	Material Risk	High Risk	Sample Ref: 19172D-02-006
Details			
Sample Ref:	Previously Identified	Floor:	A
Lab Reference:	N/A	Location:	Asbestos lagging residue to hangers
Identification:	Previously Identified	Survey Date:	29/03/2014
Area/Room No:	006	Review Date:	11/02/2015
Type of Scope:	Zone 5 STM Out	Access Gained:	Yes
Material Assessment			
Product:	Thermal Insulation		
Component:	Pipe Lagging		
Condition:	High		
Surface Treatment:	Encapsulated/Sprayed/Unleaded		
Type of Asbestos:	Amosite/Chrysotile		
Material Assessment Score: 10			
Occupant Activity			
Main Activity:			
Second Activity:			
Score: 0			
Likelihood of Disturbance			
Location:			
Accessibility:	Low		
Exposure Total:			
Score: 0			
Exposure Potential			
No of Occupants:			
Req of User:			
Avg. Hours in Use:			
Score: 0			
Maintenance Activity			
Activity:			
Frequency:			
Score: 0			
Assessment Scoring			
Material Score:	10		
Priority Score:			
Total Score:	10		
Overall Risk:	High Risk		
Notes/Comments:			
Asbestos lagging residue to hangers			
Previously identified lagging residue to hangers			
Encapsulated and labelled - do not affect to hangers			
Remove under asbestos controlled conditions if affected by work or			
Manage in accordance with current asbestos legislation			
Ceiling - GFR - Concrete			
Walls - Block work			
Flooring - Screed			
Review - April 2014 - No Change			
Review - August 2014 - No Change			
Review - December 2014 - No Change			
Review - February 2015 - No Change			
Review June 2015 - No change in condition - To leave and manage via periodic review			
Action:			
Manage in accordance with Asbestos Legislation			
Estate Manager:	08 October 2015	Page 100 of 388	

8. Appendix 3 - Asbestos locations

Example of how site plan is generated for easy reference to location of ACMs that may be in close proximity to works being undertaken.



9. Appendix 4 – Sample - Permit to work, all parts must be completed by the issuing officer applicable to the area of works, see section 2.7.

UHBT WORK WITH ASBESTOS PERMIT

University Hospitals Bristol 

NHS Foundation Trust

PERMIT NO.

A Work with Asbestos Permit is required for all Works carried out on or in close proximity to asbestos where there is significant risk of exposure.

All persons carrying out work under this Permit must be aware of the UHBT Asbestos Policy & the Asbestos Management Plan and it's requirements in respect of their work.

Location of work – include Asbestos Register references		
Brief description of works (include who is to control and carry out the works)		
Risk Assessment carried out by:	Recorded in:	
Method Statement carried out by:		
Identified Control measures – from the assessment		
List PPE Requirements:		
ESTATES DEPARTMENT - RESPONSIBLE PERSON		
All of the above control measures have been implemented and the work as described can proceed		
Name:	Signed:	Date & Time:
CONTRACTOR – PRIOR TO WORK COMMENCING		
I am aware of the specific risk assessment for the above works. I will carry out the works in accordance with the requirements of the assessment and identified safe systems of work so as to minimise the risk from exposure to Asbestos		
Name:	Signed:	Date & Time:
CONTRACTOR – AFTER COMPLETION OF WORK		
All work as described is now completed, all personnel have been withdrawn. The area has been left safe and secure.		
Name:	Signed:	Date & Time:
ESTATES DEPARTMENT - RESPONSIBLE PERSON		
This permit is cancelled and copies destroyed. The original permit will be retained with the assessment		
Name:	Signed:	Date & Time:

Signing this form indicates that you are aware of the hazards indicated and will comply with the control measures indicated.

Version 2

J Buck Merch

2014

10. Appendix 5 - Sample - Notification (form FOD ASB5) (Regulation 9)

The ASB 5 must be completed fully with information as per each header and submitted to the applicable local authority 14 days clear before works can commence. A copy of this must be available on site. The following is a guide on what should be completed in each relevant box. If we have any confusing or mis-information we shall contact our external consultant for verification.



Control of Asbestos Regulations 2012

Health and Safety Executive

Notification of asbestos work

To improve the management of licensed asbestos work through auditing by the asbestos industry, HSE may share limited data provided on the ASB5 form with trade associations and relevant bodies. The data shared will be limited to: name of licensee, licence expiry date, site location, dates of work, nature of work.

Notification Number: Number will be applied here Submitted Date: date will be shown here

About you and your licence

Notification type	This is a NEW notification input your licence number
Licence number	Input date of licence expiry
Expiry date	Input company name
Licence holder name	
Address	Record full site address
Phone Number	
Email	Input company phone number and email address for who is submitting notification

Job details

Name of company contracted to	If direct to LARC input their name
Phone number of company contracted to	Input their phone number
Contact name at company contracted to	Input who your point of contact is for the LARC
Site address	Input full site address including postcode

Multiple site addresses No, there are not multiple site addresses
In which local authority is the site address (Country, Geographical Area, Local Authority) complete drop down as per location

Exact work location or description of where on premises work is to be carried out
Describe where the scaffold is being erected, with exact location of works within the building, on site location where scaffold being erected

Person preparing plan of work	Input your name here in full
Mobile number	Input your mobile number
Site supervisor	Input full name of the appointed supervisor
Mobile number	Input supervisor mobile number

Timing and duration of work

Actual start date of set up on site	Indicate exact date of when we will be starting on site, ensuring full 14 day period has been confirmed
Expected finish date of work	Ensure planning of expected finish date is worked out
Waiver required?	Only indicate if waiver required, then follow procedure

Notification Number: XXXXXXXX

Duration of work (no days)
Job start and finish times
Night working
Weekend working
Significant cessation / pause

Input exact number of days planned for works as per dates above
Input exact start time that personnel will start on site & finish time
Input if working on night shift
Input if any days working at weekend
Input if there will be gaps in the working days as stated above, such as not being on site at weekends, or we will be starting works for a couple of days and maybe returning later to complete, or if site closed on bank holidays, and such times like breaking up for Christmas

About the work

ACM Type
Work to be undertaken

Indicate the asbestos containing material as per information provided by LARC, survey or asbestos register
Indicate works accordingly

General condition of asbestos material
Main type of asbestos

Indicate as per survey/register provided and assessment after site visit on condition
Indicate as per survey/register provided

Details of the type of work to be undertaken, general condition and main type of asbestos
Explain what the works will be with regards to erecting the scaffold, include general brief on what the condition of the material is and main type of asbestos as per indicated above, if any fine clean is required before we start, if any concern on overall condition of material

Size of job (area or volume)
Minimum number of person employed per shift
Maximum number of person employed per shift

Input overall size of scaffold
Input minimum number assessed and planned for the works
Input maximum number assessed and planned for the works

Control measures and risks

Control measures used to reduce exposure

Input decontamination, RPE
If scaffold going to be in enclosure, include enclosure under negative pressure

How the work will be supervised and monitored

Using viewing panels if in enclosure
Via CCTV if in enclosure, check with LARC
Using enclosure entry if supervisor going to work within

Non-asbestos risks

Always input Yes, there are non asbestos risks that make the asbestos work more difficult

Details of non-asbestos risks

Examples could include potential Fall from Height, Manual Handling, Heat Exhaustion, Slip or Trip, continue as per site risk assessment

Special premises
Enforcing authority

Input if working in special premises

Page (2 of 3)

Notification Number XXXXXXXX

Notifier contact details and declaration

Declaration

I declare that an ACoP compliant plan of work has been prepared

Notifier name
Position

Input full name to confirm
Input position you hold in the company

10.1 Sample - Notifiable non-licensed works (form ASBNNLW1) (Regulation 9)

An ASBNNLW 1 must be submitted by the appointed contractor for all works that meet the criteria defined in section 3.3 with regards to notifying certain types of non-licensed.



Notification of non-licensed work with asbestos

Health and Safety Executive

ASB NNLW1 - Notification of non-licensed asbestos work

Notification Number: number issued by HSE Submitted Date: 15/01/2021

Contact Details

Name	Name of person submitting
Organisation name	Company name who will be undertaking the works
Telephone number	Company telephone number
Address	Full company address

Email	email@email.co.uk
-------	-------------------

Work Location

Address	Exact site address
---------	--------------------

Local Authority in which the work is being carried out	Local authority covering your area
Enforcing authority	Health and Safety Executive will enforce the works

About the Asbestos

Asbestos Type	Description of material to be removed
Details (if Other type selected)	Size in m2 or length
Quantity	Number of persons who will be undertaking the works
No. of workers involved	26/01/2021
Start date	Days duration of the work
Duration for the work	Description of works which will be undertaken
Activity and process involved	

Measures taken

Example of control measures
Workers trained in control measures
Use of Class H vacuum
Use of PPE3 respirator or equivalent and disposable overalls
Use of non-powered hand tools and wetting methods
Dust containment e.g. enclosure

11. Appendix 6 - Contractors content requirements

Information required by client (Contractors Info Pack):

- Cover page (Contractors details, name, address and contact numbers);
- Emergency contact numbers;
- Copy of contractor's licence where applicable;
- Copy of contractors Insurance including for non-licensed works;
- Training records/certificates for each operative/supervisor/manager that will be on site (i.e. recognised association certificates such as IATP or UKATA);
- Waste carrier licence issued by the EA;
- Industry body registration / certificates (i.e. ACAD, ARCA, BOHS, UKAS)

Items required prior to work commencing:

- Cover page (contractors details, name, address, contact numbers);
- Emergency contact numbers;
- Site address (location of works, department, site);
- Contractor point of contact;
- Client point of contact;
- Clients name/details (direct for UHBW or Principle Contractor);
- HSE office.

The appointed contractor must also make available the following documents and where applicable complete documentation as the works commence through to completion date:

1. Copy of ASB5/ASBNLW1 notification where applicable (see section 3.3);
2. Detailed scope of works;
3. Risk assessments and plan of works (see 3.1 and 3.2 respectively);
4. Summary of area set-up details, where it may cause concern for surrounding areas and access;
5. All persons undertaking the works signing that they have read and understand the plan of works;
6. Site Induction register, signed by all persons involved in the works;
7. Inspection certificates for all equipment to be used (see section 3), plant check sheets;
8. Trust permit-to-work issued by Responsible/Appointed Person (see section 2.7), additional items required in completed permit;
9. Contractor permit to work;
10. Decontamination unit - set-up / pre-move / daily checklist;
11. Supervisor control sheets / site records;
12. RPE maintenance check list;
13. Area / enclosure completion form;
14. Project completion form;
15. Certificate of re-occupation / any backgrounds, leak testing and/or reassurance air monitoring carried out during the works;
16. Hazardous waste consignment notes for all asbestos waste that leaves our premises;
17. Emergency procedures.

This list is non-exhaustive as site specific and contract specific additional documents may be required, such as isolation confirmation, confined space permits, working at height checks, manual handling assessments and other such health and safety documents.

13. Appendix 8 - Material and priority scoring

Material and priority scoring tools will be required to assist in our commitment to section 1.5 and our long term asbestos management. The following is a system guided by the HSE to assist in assessing not only the materials, but other factors that may result in the material scoring a high risk score due to the likelihood of disturbance, human exposure potential and foreseeable maintenance activity. To use the scoring system, we must add the normal occupant activity score to the three average scores from the likelihood of disturbance, human exposure potential and maintenance activity sections to get a total priority score. This is then added to the material score to give the total overall score. See the examples in each section for easier reference.

1. Normal occupant activity		
Assessment factor	Examples of score variables	Score
Normal occupant activity		
Main type of activity in area	Rare disturbance activity (e.g. little used store room)	0
	Low disturbance activities (e.g. office type activity)	1
	Periodic disturbance (e.g. industrial or vehicular activity which may contact ACMs)	2
	High levels of disturbance, (e.g. fire door with asbestos insulating board sheet in constant use)	3
At this point you record the score for above as relevant to your assessment of the area		

2. Likelihood of disturbance		
Location	Outdoors	0
	Large rooms or well-ventilated areas 1	1
	Rooms up to 100 m ²	2
	Confined spaces	3
Accessibility	Usually inaccessible or unlikely to be disturbed	0
	Occasionally likely to be disturbed	1
	Easily disturbed	2
	Routinely disturbed	3
Extent/amount	Extent/amount Small amounts or items (e.g. strings, gaskets)	0
	<10 m ² or <10 m pipe run	1
	>10 m ² to <50 m ² or >10 m to <50 m pipe run	2
	>50 m ² or >50 m pipe run	3
At this point you would average the scores for location, accessibility and extent/amount from above (maximum score of 3 in each section) and record score which would be maximum of 3 when averaged. Example location = 2, accessibility = 3, extent/amount = 1, added together = 6 divide by 3 = 2, this is the average for the likelihood of disturbance.		

3. Human exposure potential		
Number of occupants	None	0
	1 to 3	1
	4 to 10	2
	>10	3
Frequency of use of area	Infrequent	0
	Monthly	1
	Weekly	2
	Daily	3
Average time area is in use	<1 hour	0
	>1 to <3 hours	1
	>3 to <6 hours	2
	>6 hours	3
At this point you would average of scores for number of occupants, frequency of use, and average time area is in use (maximum score of 3) and record score. Example number of occupants = 2, frequency of use of area = 3, average time area is in use = 3, added together = 8 divide by 3 = 2.6 (with this you would round up to 3), this is the average for the human exposure potential.		

4. Maintenance activity		
Type of maintenance activity	Minor disturbance (e.g. possibility of contact when gaining access)	0
	Low disturbance (e.g. changing light bulbs in asbestos insulating board ceiling)	1
	Medium disturbance (e.g. lifting one or two asbestos insulating board ceiling tiles to access a valve)	2
	High levels of disturbance (e.g. removing a number of asbestos insulating board ceiling tiles to replace a valve or for re-cabling)	3
Frequency of maintenance activity	ACM unlikely to be disturbed for maintenance	0
	<1 per year	1
	>1 per year	2
	>1 per month	3
At this point you would average the scores for type of maintenance activity and frequency of maintenance activity and record score. Example type of maintenance activity = 2, Frequency of maintenance activity = 3, added together = 6 divide by 2 = 3, this is the average for the maintenance activity.		

At this point you would record the total to give you the priority score by adding the total scores from (1) occupant activity with the three average scores from (2), (3) and (4), the maximum score should be no more than 12. This can then assist in defining priority actions required.

From the examples above normal occupant activity = 2, likelihood of disturbance = 2, human exposure potential = 3, maintenance activity = 3, overall total for priority = 10.

Sample variable	Description	Score
Product type (or debris from product)	Asbestos reinforced composites (plastics, resins, mastics, roofing felts, vinyl floor tiles, semi-rigid paints or decorative finishes, asbestos cement etc)	1
	Asbestos insulating board, mill boards, other low-density insulation boards, asbestos textiles, gaskets, ropes and woven textiles, asbestos paper and felt	2
	Thermal insulation (e.g. pipe and boiler lagging), sprayed asbestos, loose asbestos, asbestos mattresses and packing	3
Extent of damage/deterioration	Good condition: no visible damage	0
	Low damage: a few scratches or surface marks; broken edges on boards, tiles etc	1
	Medium damage: significant breakage of materials or several small areas where material has been damaged revealing loose asbestos fibres	2
	High damage or delamination of materials, sprays and thermal insulation. Visible asbestos debris	3
Surface treatment	Composite materials containing asbestos: reinforced plastics, resins, vinyl tiles	0
	Enclosed sprays and lagging, asbestos insulating board (with exposed face painted or encapsulated), asbestos cement sheets etc.	1
	Unsealed asbestos insulating board, or encapsulated lagging and sprays	2
	Unsealed laggings and sprays	3
Asbestos type	Chrysotile	1
	Amphibole asbestos excluding crocidolite	2
	Crocidolite	3

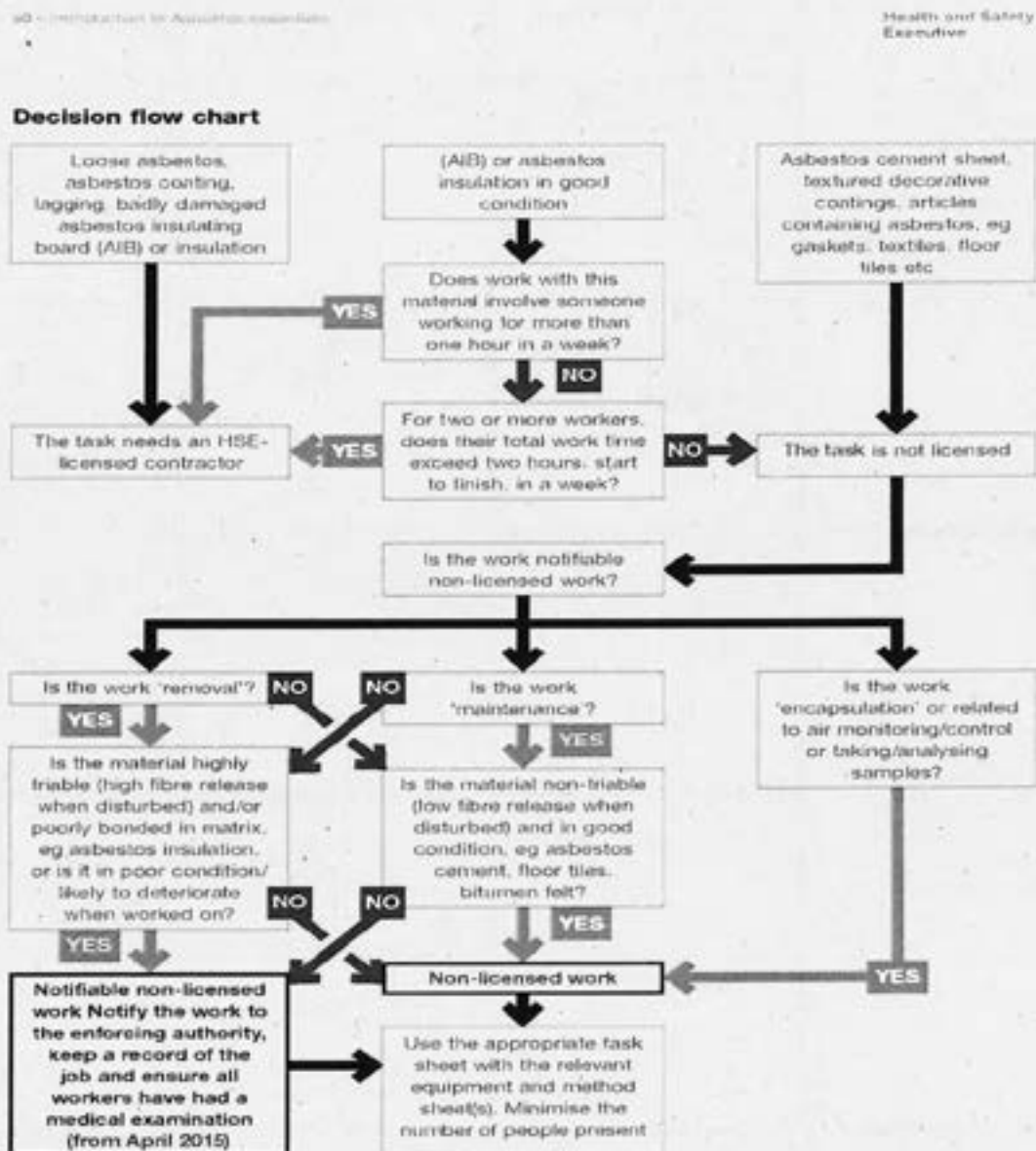
At this point you would add the total material score calculated from above (maximum should be no more than 12)

Then calculate the material added to the total priority score. From the example priority score of 10 with example of AIB = 2, with medium damage = 2, unsealed surface = 2 and contains Amosite = 2, overall material total of $8 + 10 = 18$.

The maximum score that can be added is 24, which would score the maximum priority. With this system we should be able to define the materials that require immediate attention and working our way down the scale ensuring that our asbestos database is updated at all times.

14. Appendix 9 - HSE guidance HSG 210 decision flowchart from a0

This chart along with the following table can be used to assist in identifying if our appointed contractors are defining the works correctly. If we require any further clarification we will contact our external consultant. This chart can be used mainly for identifying works that are not licensed and therefore require identification as to whether they are notifiable non-licensed works or as non-licensed.



5 of 10 pages

Note: for paper lining products see appendix 9.1 for assistance with definition of material to be assessed.

For contaminated soil and ground based products refer to appendix 9.2 flow chart

14.1 Appendix 9.1 Category of works for paper asbestos containing materials

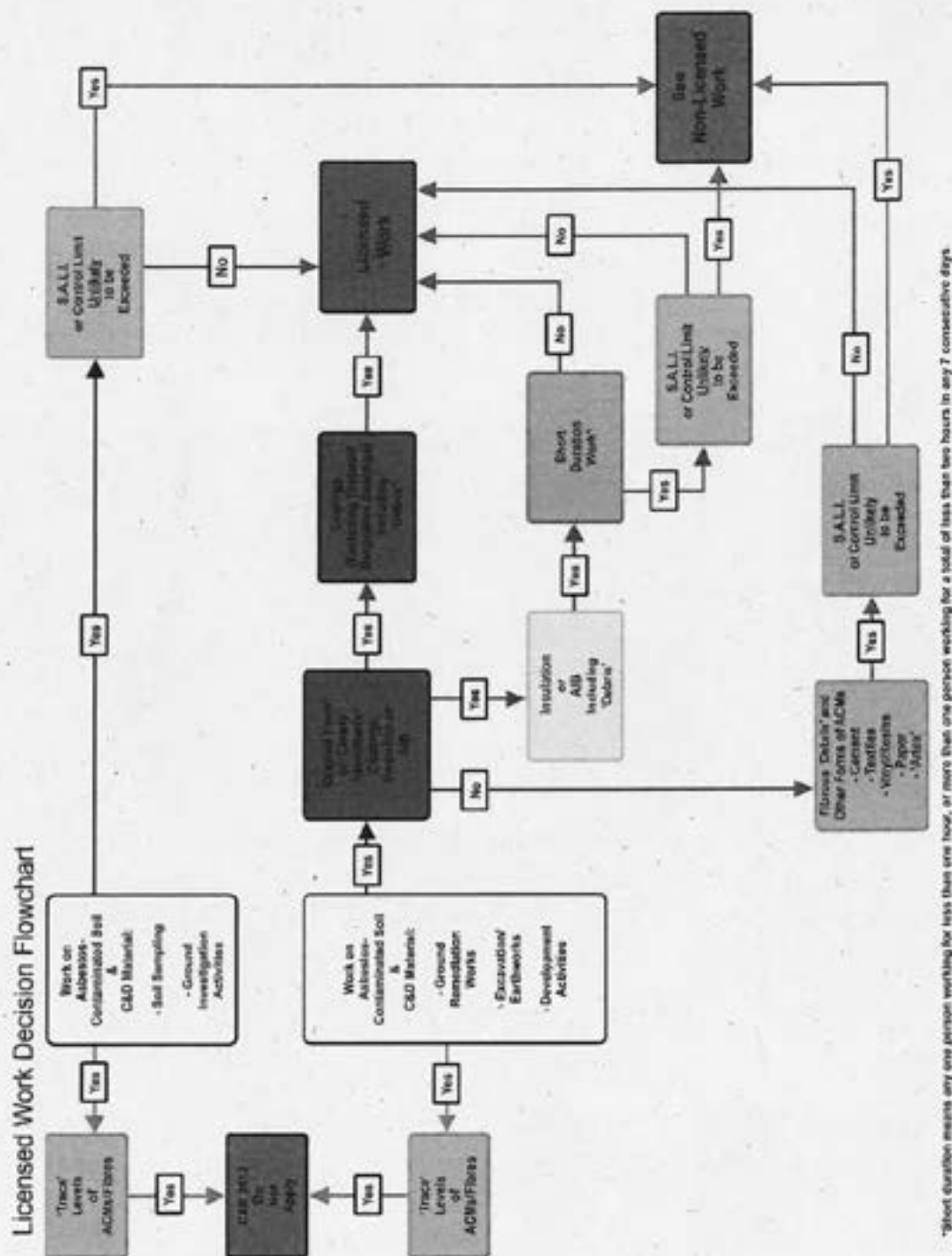
The following table has been put together by the HSE to assist in the correct definition of works that involve asbestos paper and what the classification of works it will fall into.

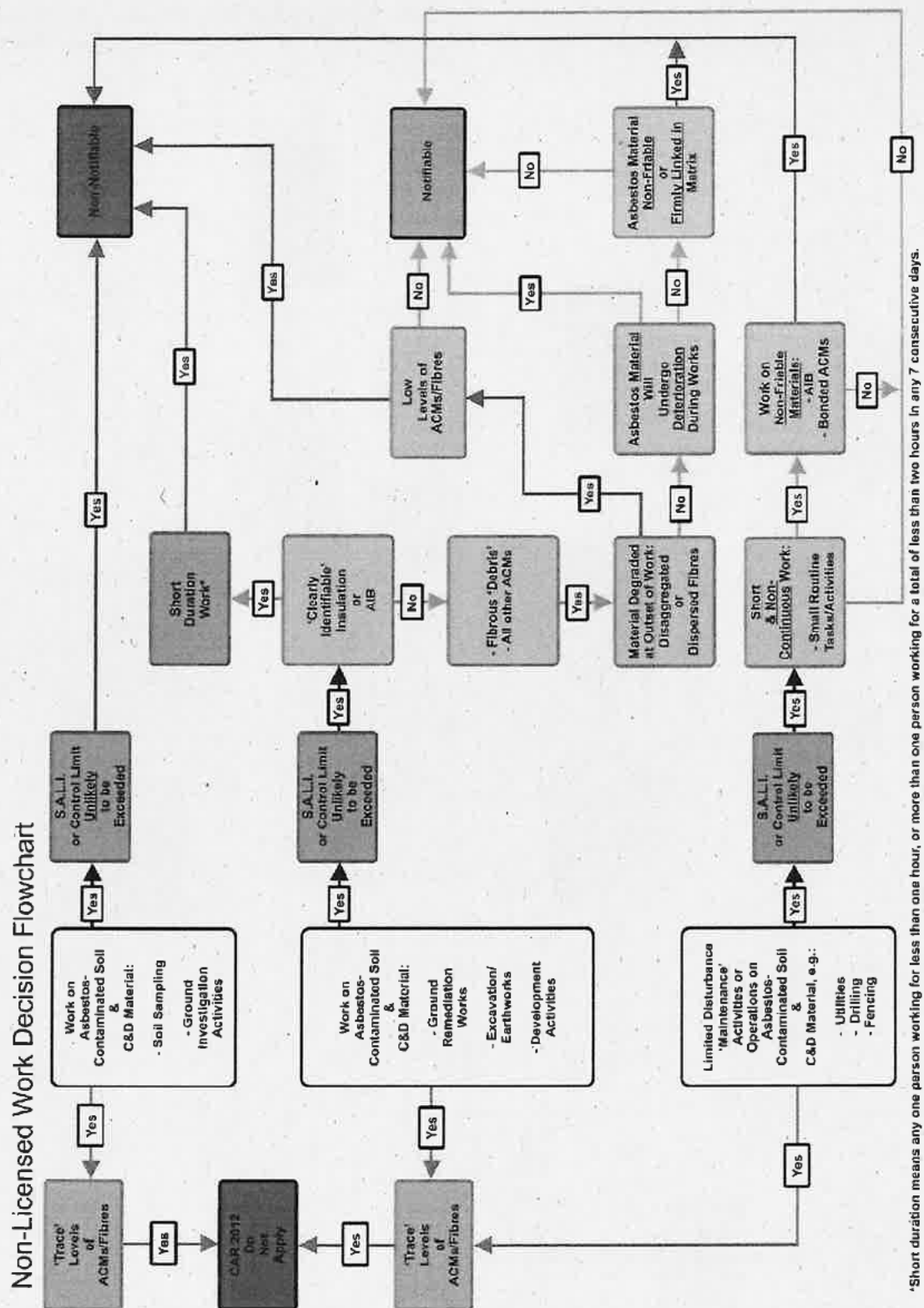
Material to be assessed	Type of work	Quantity / scale / condition	Classification
Thin asbestos paper sheets which are less than 1mm (for example, additional thin layer on a non-asbestos board or pipework, such as under rockwool or other non-asbestos insulation material)	Maintenance work undertaken by our trained non-licensed employees or contractor	Any scale (except large scale refurbishment) Any condition	Non-licensed, requires trained and component persons, completing risk assessment & plan of works
	Work that is classed as removal and that which is not maintenance e.g. large scale refurbishment of an area within the hospital	Good condition and removed largely intact etc.	Non-licensed, requires trained and component persons, completing risk assessment & plan of works
	Removal that is not maintenance work e.g. large scale refurbishment of an area within the hospital	Poor condition or difficult to remove e.g. large areas stuck to pipework etc.	Notifiable non-licensed work, requires trained and component persons, completing risk assessment & plan of works, including ASBNNLW1 completed with non-licensed medical
Thicker asbestos paper which is greater than 1mm in thickness such as corrugated board, woven material used for insulation purposes	Any work except short duration	All work except short duration Condition not relevant	Licensed, requires trained and component persons, completing risk assessment & plan of works, including ASB5 completed with licensed medical
	"Short Duration" work	Work that meets the short duration criteria set out in CAR 2012 Regulation 2(3). Classed as maintenance* Estimate of exposure levels: Unlikely to exceed the Control Limit or Short Term Exposure Level.	Non-licensed, , requires trained and component persons, completing risk assessment & plan of works

* Note: Work classed as "removal" (i.e. larger scale) would not meet the short duration exemption and therefore would be licensable.

We will require background monitoring for the above works to verify that the chosen category of works and the removal method being undertaken are correct and to assist in verifying future decisions made on this type of works

14.2 Appendix 9.2 extracted from the CL:AIRE guidance to assist with works where asbestos has been identified in the ground. The 2 following flowcharts must be referred to, to assist in identifying whether the works can be undertaken as licensed,>NNLW or non-licensed





If unsure of interpretation contact our asbestos consultant.

15. Appendix 10 - HSE guidance

With the flowchart above and the table below will assist in identifying whether our works require a licensed contractor or a trained contractor to undertake non-licensed works. When identified as non-licensed, then the a0 flowchart must be used to identify if it falls into notifiable non-licensed works or stays as non-licensed.

Task	Material	Asbestos type	1-hour threshold	Action
Remove	Loose or spray or lag	White	More than 1 hour	Licensed
Remove	Loose or spray or lag	White	Less than 1 hour	Licensed
Remove	Loose or spray or lag	Brown or blue	More than 1 hour	Licensed
Remove	Loose or spray or lag	Brown or blue	Less than 1 hour	Licensed
Remove	Loose or spray or lag	Unknown - presumed	More than 1 hour	Licensed
Remove	Loose or spray or lag	Unknown - presumed	Less than 1 hour	Licensed
Remove	Insulation	White	More than 1 hour	Licensed
Remove	Insulation	White	Less than 1 hour	Licensed
Remove	Insulation	Brown or blue	More than 1 hour	Licensed
Remove	Insulation	Brown or blue	Less than 1 hour	Licensed
Remove	Insulation	Unknown - presumed	More than 1 hour	Licensed
Remove	Insulation	Unknown - presumed	Less than 1 hour	Licensed
Remove	AIB board or block	Brown or blue	More than 1 hour	Licensed
Remove	AIB board or block	Unknown - presumed	More than 1 hour	Licensed
Repair	Loose or spray or lag	White	More than 1 hour	Licensed
Repair	Loose or spray or lag	White	Less than 1 hour	Licensed
Repair	Loose or spray or lag	Brown or blue	More than 1 hour	Licensed
Repair	Loose or spray or lag	Brown or blue	Less than 1 hour	Licensed
Repair	Loose or spray or lag	Unknown - presumed	More than 1 hour	Licensed
Repair	Loose or spray or lag	Unknown - presumed	Less than 1 hour	Licensed
Repair	Insulation	White	More than 1 hour	Licensed
Repair	Insulation	Brown or blue	More than 1 hour	Licensed
Repair	Insulation	Unknown - presumed	More than 1 hour	Licensed
Repair	AIB board or block	Brown or blue	More than 1 hour	Licensed
Repair	AIB board or block	Unknown - presumed	More than 1 hour	Licensed
Seal	Loose or spray or lag	White	More than 1 hour	Licensed

Seal	Loose or spray or lag	Brown or blue	More than 1 hour	Licensed
Seal	Loose or spray or lag	Unknown - presumed	More than 1 hour	Licensed
Remove	Fabric, rope, yarn etc.	Brown or blue	More than 1 hour	May be licensed
Remove	Fabric, rope, yarn etc.	Unknown - presumed	More than 1 hour	May be licensed
Repair	Fabric, rope, yarn etc.	Brown or blue	More than 1 hour	May be licensed
Repair	Fabric, rope, yarn etc.	Unknown - presumed	More than 1 hour	May be licensed
Seal	Loose or spray or lag	White	Less than 1 hour	May be licensed
Seal	Loose or spray or lag	Brown or blue	Less than 1 hour	May be licensed
Seal	Loose or spray or lag	Unknown - presumed	Less than 1 hour	May be licensed
Seal	Insulation	White	More than 1 hour	May be licensed
Seal	Insulation	Brown or blue	More than 1 hour	May be licensed
Seal	Insulation	Unknown - presumed	More than 1 hour	May be licensed
Enclose	Loose or spray or lag	White	More than 1 hour	May be licensed
Enclose	Loose or spray or lag	Brown or blue	More than 1 hour	May be licensed
Enclose	Loose or spray or lag	Unknown - presumed	More than 1 hour	May be licensed
Enclose	Insulation	White	More than 1 hour	May be licensed
Enclose	Insulation	Brown or blue	More than 1 hour	May be licensed
Enclose	Insulation	Unknown - presumed	More than 1 hour	May be licensed
Enclose	AIB board or block	Brown or blue	More than 1 hour	May be licensed
Enclose	AIB board or block	Unknown - presumed	More than 1 hour	May be licensed
Remove	AIB board or block	Brown or blue	Less than 1 hour	Non-licensed
Remove	AIB board or block	Unknown - presumed	Less than 1 hour	Non-licensed
Remove	Fabric, rope, yarn etc.	White	More than 1 hour	Non-licensed
Remove	Fabric, rope, yarn etc.	White	Less than 1 hour	Non-licensed
Remove	Fabric, rope, yarn etc.	Brown or blue	Less than 1 hour	Non-licensed
Remove	Fabric, rope, yarn etc.	Unknown - presumed	Less than 1 hour	Non-licensed
Remove	Matrix product	White	More than 1 hour	Non-licensed
Remove	Matrix product	White	Less than 1 hour	Non-licensed
Remove	Matrix product	Brown or blue	More than 1 hour	Non-licensed
Remove	Matrix product	Brown or blue	Less than 1 hour	Non-licensed
Remove	Matrix product	Unknown - presumed	More than 1 hour	Non-licensed
Remove	Matrix product	Unknown - presumed	Less than 1 hour	Non-licensed

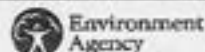
Repair	Insulation	White	Less than 1 hour	Non-licensed
Repair	Insulation	Brown or blue	Less than 1 hour	Non-licensed
Repair	Insulation	Unknown - presumed	Less than 1 hour	Non-licensed
Repair	AIB board or block	Brown or blue	Less than 1 hour	Non-licensed
Repair	AIB board or block	Unknown - presumed	Less than 1 hour	Non-licensed
Repair	Fabric, rope, yarn etc.	White	More than 1 hour	Non-licensed
Repair	Fabric, rope, yarn etc.	White	Less than 1 hour	Non-licensed
Repair	Fabric, rope, yarn etc.	Brown or blue	Less than 1 hour	Non-licensed
Repair	Fabric, rope, yarn etc.	Unknown - presumed	Less than 1 hour	Non-licensed
Repair	Matrix product	White	More than 1 hour	Non-licensed
Repair	Matrix product	White	Less than 1 hour	Non-licensed
Repair	Matrix product	Brown or blue	More than 1 hour	Non-licensed
Repair	Matrix product	Brown or blue	Less than 1 hour	Non-licensed
Repair	Matrix product	Unknown - presumed	More than 1 hour	Non-licensed
Repair	Matrix product	Unknown - presumed	Less than 1 hour	Non-licensed
Seal	Insulation	White	Less than 1 hour	Non-licensed
Seal	Insulation	Brown or blue	Less than 1 hour	Non-licensed
Seal	Insulation	Unknown - presumed	Less than 1 hour	Non-licensed
Seal	AIB board or block	Brown or blue	More than 1 hour	Non-licensed
Seal	AIB board or block	Brown or blue	Less than 1 hour	Non-licensed
Seal	AIB board or block	Unknown - presumed	More than 1 hour	Non-licensed
Seal	AIB board or block	Unknown - presumed	Less than 1 hour	Non-licensed
Seal	Fabric, rope, yarn etc.	White	More than 1 hour	Non-licensed
Seal	Fabric, rope, yarn etc.	White	Less than 1 hour	Non-licensed
Seal	Fabric, rope, yarn etc.	Brown or blue	More than 1 hour	Non-licensed
Seal	Fabric, rope, yarn etc.	Brown or blue	Less than 1 hour	Non-licensed
Seal	Fabric, rope, yarn etc.	Unknown - presumed	More than 1 hour	Non-licensed
Seal	Fabric, rope, yarn etc.	Unknown - presumed	Less than 1 hour	Non-licensed
Seal	Matrix product	White	More than 1 hour	Non-licensed
Seal	Matrix product	White	Less than 1 hour	Non-licensed
Seal	Matrix product	Brown or blue	More than 1 hour	Non-licensed
Seal	Matrix product	Brown or blue	Less than 1 hour	Non-licensed

Seal	Matrix product	Unknown - presumed	More than 1 hour	Non-licensed
Seal	Matrix product	Unknown - presumed	Less than 1 hour	Non-licensed
Enclose	Loose or spray or lag	White	Less than 1 hour	Non-licensed
Enclose	Loose or spray or lag	Brown or blue	Less than 1 hour	Non-licensed
Enclose	Loose or spray or lag	Unknown - presumed	Less than 1 hour	Non-licensed
Enclose	Insulation	White	Less than 1 hour	Non-licensed
Enclose	Insulation	Brown or blue	Less than 1 hour	Non-licensed
Enclose	Insulation	Unknown - presumed	Less than 1 hour	Non-licensed
Enclose	AIB board or block	Brown or blue	Less than 1 hour	Non-licensed
Enclose	AIB board or block	Unknown - presumed	Less than 1 hour	Non-licensed
Enclose	Fabric, rope, yarn etc.	White	More than 1 hour	Non-licensed
Enclose	Fabric, rope, yarn etc.	White	Less than 1 hour	Non-licensed
Enclose	Fabric, rope, yarn etc.	Brown or blue	More than 1 hour	Non-licensed
Enclose	Fabric, rope, yarn etc.	Brown or blue	Less than 1 hour	Non-licensed
Enclose	Fabric, rope, yarn etc.	Unknown - presumed	More than 1 hour	Non-licensed
Enclose	Fabric, rope, yarn etc.	Unknown - presumed	Less than 1 hour	Non-licensed
Enclose	Matrix product	White	More than 1 hour	Non-licensed
Enclose	Matrix product	White	Less than 1 hour	Non-licensed
Enclose	Matrix product	Brown or blue	More than 1 hour	Non-licensed
Enclose	Matrix product	Brown or blue	Less than 1 hour	Non-licensed
Enclose	Matrix product	Unknown - presumed	More than 1 hour	Non-licensed
Enclose	Matrix product	Unknown - presumed	Less than 1 hour	Non-licensed

This list is non-exhaustive, and should we come across scenarios that are not listed we will add accordingly after obtaining verification of the works.

Appendix 11 – EA example waste consignment note

Form HWCND5/112

The Hazardous Waste Regulations 2005:
Consignment Note

PRODUCER'S/HOLDER'S/CONSIGNOR'S COPY (delete as appropriate)

PART A: Notification details 6 letters of removal company / followed

1. Consignment note ref: By 5 numbers

2. The waste described below is to be removed from (name, address, postcode, telephone, e-mail, facsimile):

Must be our full address

3. The waste will be taken to (name, address and postcode):

Full address of where our waste will be taken to

4. The waste producer was (if different from 2) (name, address, postcode, telephone, e-mail, facsimile):

The removal company's full address

PART B: Description of the waste If consignment note is split, tick here ☐

1. The process giving rise to the waste(s) was: Asbestos Removal Work 2. SIC (2007) for the process giving rise to the waste(s): 35.00.1

3. WASTE DETAILS (where more than one waste type is collected all of the information given below must be completed for each EWC identified)

Description of waste	List of wastes (EWC code(s) only)	Quantity (kg)	The chemical/biological components in the waste and their concentrations (ppm)		Physical form (gas, liquid, solid, powder, sludge or mixed)	Hazard code(s)	Container type, number and size
			Component	Concentration (ppm or mg/kg)			
Asbestos insulation board	A 7 0 8 0 8	1400	Amphibole	20%	Solid	HPS, HPT	117 bags
Asbestos felt	A 7 0 8 0 8	250	Chrysotile	10%	Solid	HPS, HPT	33 bags

The information given below is to be completed for each EWC identified

EWC code	UN identification number(s)	Proper shipping name(s)	UN class(es)	Packing group(s)	Special handling requirements
A 7 0 8 0 8	UN2731	Waste Asbestos, Amphibole (insulated)	9	II (S)	Manual only
A 7 0 8 0 8	UN2800	Waste Asbestos, Chrysotile	9	II (S)	Manual only

PART C: Carrier's certificate (If more than one carrier is used, please attach schedule for subsequent carriers. If schedule of carriers is attached tick here: ☐)

I certify that I have collected the consignment and that the details in A1, A3 and B1 are correct and I have been advised of any specific handling requirements.

Where this note comprises part of a multiple collection the serial number and collection number are:

1. Carrier name: (name of lorry or vehicle)

On behalf of (name, address, postcode, telephone, e-mail, facsimile):

As AA

Their waste carries no. check with certificate

2. Carrier registration no./reason for exemption:

3. Vehicle registration no. for mode of transport, if not road:

Signature: Of vehicle taking the waste by road and driver sign below

Date: 1 4 0 4 2 0 1 6 Time: 1 4 1 5

PART D: Consignor's certificate

I certify that the information in A, B and C has been completed and is correct, that the carrier is registered or exempt and was advised of the appropriate precautionary measures. All of the waste is packaged and labelled correctly and the carrier has been advised of any special handling requirements.

I confirm that I have fulfilled my duty to apply the waste hierarchy as required by Regulation 12 of the Waste (England and Wales) Regulations 2011.

1. Consignor name: (name they have checked)

On behalf of (name, address, postcode, telephone, e-mail, facsimile):

As AA

Signature: Signed by above

Date: 1 4 0 4 2 0 1 6 Time: 1 6 3 0

PART E: Consignee's certificate (Where more than one consignee is involved all of the information given below must be completed for each EWC)

Individual EWC code(s) received	Quantity of each EWC code received (kg)	EWC code accepted/rejected	Waste management operation (R or D code)
A 7 0 8 0 8	Note: should roughly match to B3 quantity	A	D05
A 7 0 8 0 8		A	D05

1. I received this waste at the address given in A3 on: Date: 1 5 0 4 2 0 1 6 Time: 0 8 4 0

2. Vehicle registration no. for mode of transport if not road:

Where forward to the waste carrier (if 1):

3. Where waste is rejected please provide details:

Name: (name of where waste has gone to)

On behalf of (name, address, postcode, telephone, e-mail, facsimile):

This must match with A3, with signature signing below

I certify that waste permit/exempt waste operation number:

(Note: waste permit number)

authorises the management of the waste described in B at the address given in A3.

Where the consignment forms part of a multiple collection, as identified in Part C, I certify that the total number of consignments forming the collection are:

4

Signature: Signed to confirm above

Date: 1 5 0 4 2 0 1 6 Time: 0 9 0 5

Note: all times and dates should correspond as the waste progresses through transport

HWCND5/112

17. Appendix 12 - The action plan format

Priority	Task	Recommendation	Cost	Date achieved
1	Develop an asbestos management plan (AMP) to include UHBW's asbestos policy and roles and responsibilities			
2	Set up a formal Asbestos management group to meet regularly			
3	Review the current asbestos database with a view to making it more staff friendly / user friendly and review its capacity to produce external contractor's accurate information regarding ACMs			
4	Obtain asbestos awareness training certificates from all external contractors and audit response contractors on site regarding their asbestos awareness competence and procedures			
5	Carry out asbestos awareness training for various key staff members			
6	Survey all outstanding buildings which are owned / leased by UHBW.			

