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1.0 Asbestos Management Policy Statement

Rationale

The Belfast Health and Social Care Trust (BHSCT) recognises the responsibilities and duties under the Health and Safety at Work (NI) Order 1978, to provide so far as is reasonably practicable through best practice, the health, safety and welfare of all patients, visitors, staff, contractors and others who may be affected by matters within its control.

To this end, the Trust must comply with duties under the Control of Asbestos Regulations (Northern Ireland) 2012 and accept its duty to manage asbestos in non-domestic premises. The Regulation places a specific legal duty on every person to: identify materials containing asbestos in any premises they own, occupy and manage or for which they have responsibility, to assess the risk of those materials and to ensure that a management system is in place that responds correctly and appropriately to the materials present. The duty to assess Health and Safety risk extends within The Construction (Design and Management) Regulations (Northern Ireland) 2016.

To ensure compliance with this requirement the Trust has developed an Asbestos Management Policy that shall apply to all Trust properties owned and maintained by the Trust where asbestos is present. This policy relates solely to the management of asbestos containing materials (hereafter known as ACMs), it is a live document and will be reviewed periodically as and when new legislation, Approved Codes of Practice (ACOP) and guidance is changed.

Objectives

- prevent exposure to the risks associated with ACMs
- identify the location of ACMs in premises owned and maintained by the Trust, the type where reasonably practicable, the amount and its condition
- provide and maintain an Asbestos Register which records those locations and the condition of the ACMs
- assess the risk from ACMs based on their condition and accessibility
- remove ACMs which are in poor condition, easily accessible and thus readily disturbed, or that may be disturbed in the conduct of maintenance or other building works
- manage any ACMs left in place by labelling where there is a significant risk of disturbance, by setting up and maintaining procedures to prevent ACMs being disturbed inadvertently, and by undertaking periodic condition inspections.
- provide information on the location and condition of ACMs to anyone who is likely to disturb them
- review the effectiveness of the Asbestos Management Policy on a regular basis
- promote awareness of the risk of exposure to asbestos and the Trust's policy and procedures through training of relevant staff

Policy Statement

The Trust has put in place a management structure to ensure the asbestos management policy objectives are met. This includes the allocation of responsibility for asbestos management to the Co-Director Head of Estates and the implementation of an Asbestos Management Policy within the Estates Department.

Definitions/Abbreviations

ACM – Asbestos Containing Material

AMP – Asbestos Management Procedure

AA - Accredited Analyst

LARC - Licensed Asbestos Removal Contractor

Asbestos Request Form (AR1) – must be completed for all types of asbestos survey requests, air monitoring, asbestos removal works etc. The purpose of this form is an instruction to the asbestos contractor to proceed with the works, and for the Risk Technicians to manage the asbestos register effectively

UKAS – United Kingdom Accreditation Service for accredited scheme for surveying, sampling and analysis

Management survey– is the standard survey. Its purpose is to access and locate as far as reasonably practicable the presence, type and extent of suspect ACMs in the building or specified area, which could be damaged or disturbed during normal occupancy, including foreseeable maintenance and installation of new equipment, to assess their condition and in prioritising any remedial work.

Refurbishment/Demolition Survey (R&D) – is a fully intrusive survey with samples. It is required before any refurbishment or demolition work is carried out. This type of survey is used to locate and describe as far as is reasonably practicable all ACMs in the area where the refurbishment work will take place or in the whole building if demolition is planned.

Cable route survey (CRS) – is a specific cable route refurbishment survey with samples taken as required (suspected ACMs on cable route). This type of survey is used predominantly for routing of cable and containment and describes as far as is reasonably practicable all ACMs on that route (limited to the cabling and associated containment only). Only positive ACMs identified during the CRS will be added to the Trusts electronic register. A pdf copy of the full report will be added to the register.

Removals Specification (RS) – is a schedule to be referenced by the LARC in their quotation for the Plan of Works (POW) and should identify the extent of the requirements and the risks associated with the asbestos removal. The RS should include

- The quantity, extent, condition, thickness and type of ACM, including how it is fixed or attached to substrates, to ensure all instructions are clear and explicit.

Health and Safety requirements to safely carry out the work should be identified by the LARC, within their risk assessment and method statement.

Vacant Accessible – is a building that is unoccupied but still maintained with access through normal means of entry.

Vacant Inaccessible – is a building that is an unoccupied and inaccessible by usual means of entry as they are closed using bricks, blocks, hoarding or other materials that prevent entry by a key or tool. This is managed on the asbestos register as no access, presumed 'worst case'.

Legal Responsibility

The Trust has a duty to assess and manage the risks from asbestos and comply with their legal requirements. The Trust Board are ultimately responsible for the implementation of the Asbestos Management Policy. The Co. Director Head of Estates has a professional and technical responsibility for the land, building fabric and the permanent services of the Trust's estate and compliance with the Trust's Asbestos Management Policy. The Trust's Asbestos Management Policy shall be controlled by the Estate Services Department and will ensure that asbestos management of the Trust estate is compliant with current legislation and best practice.

2.0 Introduction

Asbestos is the term used for a range of natural minerals.

The three main types of asbestos, commercially used are

- blue (Crocidolite)
- brown (Amosite)
- white (Chrysotile)

Asbestos-containing materials have had many uses. Asbestos was extensively used as a building material in the UK from the 1950s through to the mid-1980s. It was used for a variety of purposes and was ideal for fireproofing and insulation. Since the 1970s the use of asbestos has been gradually reduced through the introduction of voluntary and formal bans and by 1999 the importation, supply and use of any form of asbestos-containing material was totally banned.

Any building constructed or refurbished before 2000 (houses, factories, offices, schools, hospitals etc.) can contain asbestos. Asbestos materials in good condition are safe unless asbestos fibres become airborne, which happens when materials are damaged. Therefore, the presence of asbestos-based materials, in sound condition and undisturbed does not constitute a danger.

Under the Control of Asbestos Regulations (Northern Ireland) 2012, the Trust has a duty to manage ACMs in its buildings.

This document sets out the Trust procedures for managing asbestos.

3.0 Roles and Responsibilities

3.1 Chief Executive

The Trust Chief Executive is the “duty holder” under the Control of Asbestos Regulations (NI) 2012.

3.2 Director of Finance, Estates & Capital Redevelopment

The Director of Finance, Estates & Capital Redevelopment is the executive director lead for the management of risk of exposure from asbestos, and is responsible for ensuring that suitable arrangements are in place including the appropriate allocation of adequate resources to meet the Trust’s policy.

3.3 Co- Director Head of Estates and Senior Management Team

The Head of Estates in conjunction with the Estates Senior Management Team is responsible for ensuring that suitable arrangements are in place for the management of the risk of exposure from asbestos, including the following:

- The systematic and proactive identification of asbestos in all Trust premises.
- ACMs present within the Trust are effectively managed in accordance with applicable legislation and codes of practice.
- Available resources are provided and directed appropriately to implement the Asbestos Management Policy and additional resources sought as required.
- The implemented Asbestos Management Policy is monitored to ensure that working arrangements and provision of financial, technical, human and other resources are suitable and sufficient to meet its requirements.
- Adequate steps are taken to identify and record, on the Trust’s Asbestos Register, the location, type and condition of asbestos materials where they are likely to be present in premises owned and maintained by the Trust.
- The periodic monitoring of the condition of ACMs, updating the asbestos register and reassessing the risks.
- The repair, sealing, labelling or removing of asbestos, if there is a risk of exposure due to its condition or location.
- The preparation of appropriate risk assessments before commencing any work, which exposes or is liable to expose employees or others to asbestos.
- Making available information to those who may come into contact or disturb ACMs. Information shall be provided in a written/electronic format and shall be correct on the date it was surveyed.
- Asbestos matters are taken account of in the delivery of all Estates activities i.e. by the Operations, Projects and Risk & Environment Teams, and procedures are followed in accordance with the Asbestos Management Procedures outlined in Section 8.
- Ensuring that prior to the commencement of any works which may have the potential to bring staff into contact with ACMs, the asbestos register is consulted and information used within the risk assessment developed for the works. Where there is insufficient

information available an appropriate asbestos survey must be commissioned before commencement of any works.

- The AR1 process is strictly followed for Asbestos surveys, air monitoring and removal work etc.
- Staff receive appropriate training/supported learning and instruction on the risks associated with asbestos and the Trust's Asbestos Management Policy and Procedures.
- Estates staff are aware of their responsibilities under the Asbestos Management Policy and engage in regular consultation with the Estates Risk Team/AA/LARC in relation to the management of asbestos.
- Lockdowns and controlled access areas are managed in accordance with the asbestos management procedures.
- Relevant staff have access to the Asbestos Register and other such information as required.
- A record is retained of all statutory documents generated and required by asbestos removal works.
- The Trust only appoints reputable, licensed asbestos removal contractors, surveyors and analysts with proven records of accomplishment, competence and experience.
- The Trust's asbestos measured term contractors (MTCs) are managed and liaison takes place between the appointed contractors/consultants and the Trust. Asbestos MTCs are monitored to assess their performance and compliance with statutory requirements.

3.4 Co-Director Capital Redevelopment

The Co-Director Capital Redevelopment is responsible for:

- Ensuring where relevant, any building purchased/leased on behalf of the Trust is surveyed to assess the presence of ACMs.
- The preparation of appropriate risk assessments before commencing any work, which exposes or is liable to expose employees or others to asbestos.
- Putting in place arrangements so that work that may disturb the ACMs complies with current legislation.
- Ensuring that prior to the commencement of any works that may have the potential to bring staff into contact with ACMs, the asbestos register is consulted and information is used to develop the risk assessment for the works. Where there is insufficient information available an appropriate asbestos survey must be commissioned before commencement of any works.
- Ensuring Project plans allocate sufficient resources to manage and address asbestos issues
- Ensuring Project plans allocate sufficient timing to address asbestos issues
- Ensuring Staff under their control receive appropriate training/supported learning and instruction on the risks associated with asbestos and the Trust's Asbestos Management Policy and Procedures
- Ensuring Staff under their control are aware of their responsibilities under the Asbestos Management Policy and engage in regular consultation with the Estates Risk Team in relation to the management of asbestos.
- The AR1 process is followed for Asbestos surveys, air monitoring and removal work etc.

3.5 Divisional Risk Manager

The Divisional Risk Manager is responsible for:

- Assessing, reviewing and recommending management actions in light of re-inspection findings and changes to regulations or current best practice.
- Auditing and reviewing the on-going management of asbestos within the Trust
- Implementing the asbestos management policy, ensuring that appropriate steps are taken to manage ACMs and associated policies and procedures are periodically reviewed.
- Carrying out appropriate levels of investigation in response to queries arising, e.g. via the Help Desk, Estates Officers, or via Trade Union Safety Representatives, and providing documented responses where relevant.
- Ensuring that a procedure is available within the Asbestos Management Policy for asbestos remedial/removal works, for reference by Estates staff responsible for those works.
- Providing advice and guidance for those with responsibilities under the Asbestos Management Policy.
- Monitoring changes in legislation or codes of practice and reviewing the Trust policy accordingly.
- Providing the Health and Safety Executive NI (HSENI) and other related bodies with details of asbestos management procedures and removal works upon request.

3.6 All Estates Officers / Estates Supervisors / Capital Redevelopment staff

Staff undertaking projects, maintenance, minor works and capital redevelopment works are responsible for:

- Ensuring the Trusts Asbestos Management Policy and Procedures are followed.
- Ensuring appropriate arrangements are in place to manage and organise works where asbestos is present. This means appointing suitably competent contractors and providing them with sufficient information and time to do the job safely. If asbestos remedial works are required, competent asbestos removal contractors must be appointed.
- Informing and liaising with relevant staff in respect of asbestos related works.
- Ensuring the Trusts Asbestos Register is consulted prior to access to any area or any works commencing, to identify any known presence of ACMs.
- Liaison with the asbestos surveyor prior to all refurbishment work and completion of the AR1 form, and following accidental damage of known or suspected asbestos materials
- Ensuring the AR1 process is followed for all asbestos surveys, air monitoring, and removal works etc., including an appropriate and comprehensive scope of works.
- Liaison with the LARC in the management/removal/remediation of asbestos material identified in survey reports.
- Providing contractors and consultants, likely to disturb the building fabric, with an up to date copy of the relevant asbestos information from the Trusts electronic asbestos register.

- Ensuring that where refurbishment or demolition works are planned, a competent surveyor (as detailed in AMP 2) completes a Refurbishment and Demolition Survey (area to be unoccupied).
- Ensuring that a competent contractor is used to undertake asbestos removal works (as detailed in AMP 3).
- Ensuring that for any complex asbestos removal works a specification for removal is developed by the AA and provided to the LARC for costing and implementation.
- Informing the Risk Technicians in advance of asbestos removal works being undertaken through the AR1 process.
- Making local arrangements with building users and service providers to facilitate the asbestos works.
- Ensuring, that in advance of the commencement of removal works, risk assessments and method statements are requested from the LARC.
- Reviewing the LARC's method statements and risk assessments, for those works under their control, with the assistance of the asbestos surveyor if necessary.
- Ensuring that throughout the asbestos removal, the removal job is closely managed by either someone in-house who is competent and trained to do so or the AA carries out this role.
- In consultation with the AA, stopping any asbestos removal work, directly or through the contractor administrator, where the asbestos contractor does not perform to the required health and safety standards, or when their actions appear likely to result in a breach of Trust standards.
- Informing the Risk Technicians when a project involving asbestos removal work is completed, and providing the Risk Technicians with all documents generated by the asbestos works e.g. copy of notification, method statement, and clearance certificates, reassurance testing and disposal consignment notes. This will allow the register to be updated and remain a 'live' system.
- Providing the Risk Technicians with details of asbestos-containing materials removed during asbestos removal works using the AR1 process
- Retaining a copy of all documentation relating to asbestos in the appropriate project file.
- Informing staff, consultants and contractors of the location of any known ACMs affecting a project.
- Ensuring that work is halted, the Divisional Risk Manager and Divisional Operations/Project Manager is informed if suspect asbestos material is discovered during the course of the works.

- Arranging the evacuation and closure of areas in Trust premises, in conjunction with the Divisional Risk Manager, in the event of an uncontrolled escape of asbestos fibres.
- Ensuring that a project and cost plan program is maintained in relation to the management of asbestos.

3.7 Risk Technicians

The Estates Risk Technicians are responsible for:

- Ensuring the Trusts asbestos register is kept up to date with information provided by Estates Officers regarding surveys, air monitoring and air clearance certificates and removal information.
- Implementing periodic monitoring of the condition of high risk ACMs, updating the asbestos register and reassessing the risk.
- Assisting with the provision of information to those who may come into contact or disturb ACMs. Information shall be provided in a written/electronic format and shall be correct on the date it was surveyed.
- Developing and delivering the Trusts asbestos awareness/refresher training/supported learning to all relevant staff.

3.8 All other Estates Staff

All other Estates staff are responsible for:

- Completing asbestos 'new starts' training within the first month of employment, and attending Asbestos refresher training/supported learning periodically as defined by management.
- Reporting to line manager any defects or suspected ACMs prior to starting/continuing with work.
- Making full and proper use and adherence with any control measures put in place for working adjacent to ACMs e.g. PPE, lockdown areas

3.9 Information Technology Staff (IT)

IT Staff are responsible for:

- Ensuring the Estates Risk Technicians are consulted prior to any cabling works commencing to identify any known presence of ACMs.
- Ensuring the IT Asbestos Route Request Flow Procedure is followed for all cabling works and completing the Trusts Asbestos IT Cable Route Survey (CRS) Form for carrying out surveys prior to any cabling works

- Ensuring the survey is shared with the cabling contractor to formulate an accurate RAMS and forwarding to the appropriate Estates Officer and Risk Technicians.
- Ensuring the cabling contractor has a copy of the asbestos survey on their person whilst carrying out the cabling works
- Ensuring the Estates Department is immediately alerted if asbestos is found or suspected so that assessments can be made and appropriate action taken

3.10 Licensed Asbestos Removal Contractors (LARCs)

A LARC is required for all asbestos removal works (both licensed and non-licensed works) and is responsible for:

- The implementation of a detailed and specific asbestos removal specification as and when provided by the Trust.
- A detailed programme, highlighting notifications, site set up, pressure testing, removals, environmental cleans, air tests and clearance, reoccupation certificates, stage clearances etc.
- The day-to-day management of the commissioned asbestos remedial works.
- Adhering to the term and conditions of their contract and upon completion of the asbestos removal works will provide all the required information (must include but not limited to the HSENI handover form and consignment note) to the Risk Technicians as per the AR1 process.
- Providing emergency supervised access to lockdown areas.
- Providing a risk assessment and method statement outlining controls in accordance with HSG 247.
- Making the necessary notifications and applying for waivers to the HSENI in accordance with HSG 247.
- Supporting Estates Officers in the management/removal/remediation of asbestos materials identified in survey reports.

3.11 Accredited Analyst (AA)

Companies undertaking asbestos surveys and analysis shall be *UKAS* accredited to *ISO 17025* and are responsible for:

- the surveying, identification, analysis and reporting of asbestos containing materials
- when required, the preparation of a removals specification, air monitoring and certification of removal of asbestos containing materials
- On site management of removal works

- Reviewing plans of work for removals, confirming that the area is certified 'fit for reoccupation' following asbestos works (four stage clearance or reoccupation certificate) and carrying out air monitoring throughout the works
- Carrying out detailed surveys and removal specifications as requested.
- Supporting Estates Officers with asbestos survey requests prior to all refurbishment works and following any accidental damage to suspect materials.
- Uploading of documentation and occurrences to the Trust electronic Asbestos Register as required.

3.12 External Contractor/Design Consultant

External Contractors/Consultants must adhere to the Trusts Asbestos Management Policy and all relevant legislation and guidance in the management of ACMs during the course of their works.

Prior to commencing work at the Trust, contractors shall confirm that they have received asbestos awareness training. Contractors are required to keep this training up-to-date. Confirmation can be recorded at the review meetings.

3.13 Principal Designer

Under the CDM Regulations NI 2016 where a Principal Designer is appointed (Part 2 – clause 5) the Trust has the responsibility for the provision of pre-construction information to every designer and contractor appointed or being considered for appointment (Part 2 – clause 4 (4)). Under Part 3 – clause 11 (1) the principal designer shall plan, manage and monitor the pre-construction phase and co-ordinate matters and assist in the provision of pre-construction information (Part 3 – clause 11 (6) (a)). The principal designer shall liaise with the principal contractor and share information relevant with the principal contractor (Part 3 – clause 11 (7)). In relation to asbestos, the principal designer will assist with bringing the information the Trust already holds, such as asbestos surveys together. The principal designer's role involves the development of the scope (completing the AR1), and co-ordination of the work of others to ensure that significant and foreseeable risks associated with asbestos are managed throughout the planning, management and monitoring process.

Where the Trust does not appoint a Principal Designer the Trust retains the responsibility and obligations under the CDM regulations

3.14 Principal Contractor

The Principal contractor shall plan, manage and monitor the construction phase and coordinate matters relating to health and safety and comply with their obligations in the CDM regulations together with the Trusts Asbestos Management Policy. The policy extends to any appointed subcontractors or consultants.

4.0 Identification and Management of Asbestos Risks

4.1 Identification and Location of Asbestos Containing Materials

Management asbestos surveys as recommended in *HSG 264 'The survey guide'* are required for all Trust owned and maintained buildings (where applicable consult terms of leases). The surveys are undertaken by a competent surveyor qualified to *BOHS P402*. Companies undertaking asbestos surveys and analysis shall be *UKAS* accredited to *ISO 17025*.

Asbestos surveys are undertaken to identify, where reasonably practicable, the presence, extent and condition of ACMs in buildings owned, maintained and occupied by the Trust.

If the age of the building (built after 2000) or the information obtained provides strong evidence that no ACMs are present, then this information is recorded and no further action is needed.

Additionally, in the absence of information relating to ACMs within any property it shall be assumed that asbestos is present and therefore appropriate controls dependent on activity must be put in place to avoid any exposure to asbestos.

Asbestos survey reports shall be presented in a format compatible with the current Trust asbestos register and uploaded onto the Trusts electronic register and shall provide the following minimum information: -

- Purpose and date of survey
- Annotated floor/site plans indicating sampling points and unique references
- Asbestos material assessment
- Priority Assessment to be prepared in consultation with the Estates Risk Team
- Asbestos Risk assessment
- Recommendation

4.2 Type of Asbestos Survey

There are two types of survey referred to in the Health and Safety Executive Approved Code of Practice for surveying: *HSG 264 'Asbestos: The Survey Guide'*. In addition a Cable Route Survey (CRS) has been defined by the Trust to meet the needs of the service.

4.2.1 Management Surveys

A management survey is undertaken for managing ACMs during the normal occupation and use of a building.

During the course of a management survey surveyors will inspect materials within a building and will generally take samples of suspect ACMs in order to determine if they do or do not contain asbestos. In some instances, they may presume the material to contain asbestos. Surveyors must also determine the condition and surface treatment of the material and the potential for exposure based on its location and activities liable to disturb it (using *HSG 264*). Where an area has not been surveyed due to, for example, access restrictions, ACMs must be presumed to be present if the building was constructed before 2000. However, *HSG 264*

emphasises the need to access as much of a building as far as is reasonably practicable, which will involve careful planning with building occupiers and the requesting Estates Instructing Officer.

4.2.2 Refurbishment and Demolition Surveys (R&D Surveys)

This type of survey is used to locate and describe, as far as reasonably practicable, all ACMs in the building, area or room. The survey will be fully intrusive and involve destructive inspection, as necessary to ensure access is gained to all areas including those that may be difficult to reach. A full sampling programme is undertaken to locate and record the location, extent and product type of any presumed or known ACMs. Surveyors should also determine the condition and surface treatment of the material and the potential for exposure based on its location and activities likely to disturb it (using HSG 264). R&D Surveys should only be conducted in unoccupied areas. The instructing Estates Officer should arrange for these areas to be unoccupied prior to the survey commencing. The AA will confirm when the room/area is 'fit for reoccupation' following the survey.

In advance of all refurbishment (work that disturbs the fabric of the building) or demolition, a refurbishment and demolition (R&D) survey shall be carried out as recommended in *HSG264 'The survey guide'*, by the Trust appointed MTC licensed surveyor/analyst. Survey reports shall be presented in a format compatible with the current Trust asbestos register. All information from an R&D survey shall be made available to contractors/consultants by the Estates Officer and included in the pre tender health and safety plan where appropriate.

4.2.3 Cable Route Surveys

Only positive ACMs identified during the CRS will be added to the Trusts electronic register. A pdf copy of the full report will be added to the register for reference purposes.

4.3 Risk Assessment of ACMs

Asbestos Management Surveys and R&D Surveys include a risk assessment, which takes account of the condition of the ACMs and the likelihood of disturbance. A qualitative risk ranking is assigned to each occurrence of ACMs in the Trust. These are detailed on the Asbestos Register and in each Asbestos Management Survey and R&D survey.

All ACMs are scored using a formal numerical assessment scheme detailed in referenced in *HSG 264* and detailed in table 3 of *HSG 227- A comprehensive guide to managing asbestos in premises*.

4.3.1 Material Assessment

The material assessment is carried out by the AA and looks at the type, condition and surface treatment of the complete ACM (not just the visible area) and the ease with which it will release fibres if disturbed.

4.3.2 Priority Assessment

The priority assessment looks at the likelihood of someone disturbing the ACMs based on the location and the activities being undertaken in the area.

The priority assessment will endeavor to be completed at the time of the survey. In the case of unoccupied areas/rooms, the Trust priority assessment matrix can be used to complete this exercise based on the current known usage.

The material assessment is combined with the priority assessment to give an overall risk score (high, medium or low). It is expected that the Asbestos Surveyor completes this assessment.

4.4 Developing an Asbestos Action Plan

Estates Operations must develop an asbestos action plan to prioritise asbestos removal works based on service delivery in consultation with the Estates Risk Team.

The overall risk assessment score will be used to inform the development of the plan, with higher risks requiring more attention than lower risks. The action plan will include details of the ACMs, overall risk assessment score, proposed management options, timescales and responsibility for completion.

The action plan will be periodically reviewed to take account of the risk from the ACMs, building occupant constraints, financial resources and any planned building works. The action plan will be informed by the asbestos review process (Section 4.5.1).

4.5 Management of ACMs

The following options will be considered with regard to management of ACMs.

4.5.1 Monitoring the Condition of ACMs

ACMs that are inherent in the built fabric which are in good condition, sealed and/or repaired will be left in place. The Trust will, where practicable make every effort to remove asbestos.

The conditions of the ACMs will be regularly monitored through periodic review. Frequency of monitoring will depend on the type of ACM and activities in the area and results of the overall asbestos risk assessment.

A record of the condition of the ACMs will be documented in a re-inspection survey report.

4.5.2 Seal or Encapsulate the Asbestos-containing Material

ACMs which are in sound condition, to remain in place and will not be damaged by the application of encapsulation, will be encapsulated. This will involve the coating of the outer surface of the asbestos material with a form of sealant compound. The Trust does not permit the use of polyvinyl acetate (PVA) for this process.

Only a LARC shall undertake encapsulation and sealing.

4.5.3 Repair

ACMs which are only slightly damaged may be repaired. Typical repair work is restricted to patching and sealing of small areas, for example spraying a small area of damaged ceiling tile with Liquid Impact Adhesive (as defined by the HSENI). Only a LARC shall undertake repair.

4.5.4 Remove

ACMs will be removed as part of works which are likely to disturb the ACMs or if the building is to be demolished. A LARC will undertake the work. The AA will be required to manage complex asbestos removal works from RS to the completion of the Certificate for Reoccupation including enclosure testing and air monitoring in line with HSG 248.

If an ACM is badly damaged or likely to be disturbed it must, as far as reasonably practical, be removed. If the ACM cannot be removed immediately, it may be temporarily enclosed or encapsulated. A pre-clean of the area must be undertaken as a temporary measure to allow for access only to the area.

All asbestos works will require the AA to issue a four-stage clearance or a certificate of re-occupation.

4.5.5 Lockdown

In certain cases, there may be instances where the Trust will have areas in the estate where there is a high level of asbestos debris due to the complexities of the area/constraints, and asbestos has not been removed. In this case, the areas will be designated as lockdown areas, treated, and managed as such by all staff using the lockdown procedure (AMP 10). The Risk Technician or AA will inspect and record the integrity of the access points and signage to lockdown areas on a regular basis. An Asbestos Plan must be formulated for the inspection of the actual occurrences where safe to do so, and where applicable to include air monitoring and removals.

Where controlled access has been agreed to an asbestos contaminated area, Estates Operations will manage this area. See AMP 13.

4.5.6 Vacant Buildings

Where safe to do so, the Trust will arrange for a management survey to be carried out for all vacant accessible buildings. Again, where safe to do so the surveys will be periodically reviewed. Integrity of the access points and signage to vacant buildings will be inspected quarterly by the Risk Technicians (signage will be provided by the Risk Technicians and installed by Estates Operational staff).

5.0 Consultation, Information Sharing and Training

5.1 Asbestos Management Surveys and Register

As detailed in Section 4, a management survey is required for each building owned and maintained by the Trust.

The condition of asbestos identified in management surveys is monitored through the review process. Where changes are identified in the review, risk assessments will be revised, priorities adjusted, appropriate management controls put in place and the register updated.

The management survey and review include details on the location of the ACM, the type of asbestos, condition of the asbestos, photographs of identified ACMs, and detail areas not accessible during the course of the survey. Areas not accessed by the surveyor are presumed to contain ACMs until sampling demonstrates otherwise.

Information collected during management surveys, review and R&D surveys shall be transferred on to the electronic register. The electronic register will be updated on a regular basis to record where ACMs have been removed. Only positive ACMs identified during the CRS will be added to the Trusts electronic register. A pdf copy of the full report will be added to the register.

Data contained within the asbestos register will be frequently reviewed and updated in line with physical alterations of the Trust's estate along with asbestos removal and encapsulation works being carried out. Any asbestos survey, removal and encapsulation works data must be managed by the Instructing Estates Officer as per the guidance flowcharts – see Section 8, and using the Asbestos Request Form. The Estates Risk Team will regularly update the register.

Information regarding ACMs and general information on management of asbestos may be obtained by contacting the Estates Risk Team. Each Estates Officer will have "read access" rights to the electronic register to check and obtain the appropriate information.

The Estates Department strive to raise awareness of the possible implications to health of the exposure to asbestos materials and require staff to check the asbestos register prior to commencing any work activity. Awareness training has been provided to all Estates staff within the Trust, but this will be repeated periodically.

5.2 Provision of Information to Trust Staff

Information on asbestos will be provided to all those who require it. Each Estates Officer will have 'live' access rights to asbestos management surveys and reviews through the Trusts electronic Asbestos Register.

5.3 Training

It is essential that as well as recognising the risks, every effort is made to minimise/ eliminate the risks to the working population by effectively controlling and managing all work where asbestos is present.

Training/supported learning shall play an important role within the Trust's Asbestos Risk Management System. Staff training will be recorded in accordance with Trust training procedures. The following sections outline the level of asbestos awareness training/supported learning provided to staff.

5.3.1 Estates Staff / Capital Redevelopment Staff

On commencement of employment, basic induction training will be provided to those staff likely to encounter ACMs or instruct/manage work in buildings containing asbestos. This training must be completed within the first month of employment and is available via ELearning.

Asbestos awareness and refresher training/supported learning will be provided to all appropriate Estates/Redevelopment staff. The training will include but is not limited to:

- The properties of asbestos and its effects on health, including the increased risk of developing lung cancer for asbestos workers who smoke
- The types, uses and likely occurrence of asbestos and asbestos materials in buildings and plant
- The general procedures to deal with an emergency, e.g. an uncontrolled release of asbestos dust into the workplace
- How to avoid the risk of exposure to asbestos.
- Other Trust procedures including access to the Trusts asbestos register

5.3.2 Other Groups

Awareness training will be provided to other groups as appropriate to their role.

5.4 Communication with External Contractors and Consultants

All contractors and consultants employed by the Trust are required to comply with the Trust's Asbestos Management Policy and the Control of Asbestos Regulations (NI) 2012.

Prior to commencing work at the Trust, contractors shall confirm that they have received asbestos awareness training. Contractors are required to keep this training up-to-date.

Should the NIFRS require information prior to entering a building in the event of a fire; this can be obtained from the Shift Team via security who have access to the Trust's asbestos register.

5.5 Management of Asbestos Records

A copy of records associated with asbestos removal and remediation work will be retained for a period of at least 10 years. Personal monitoring records and records of asbestos incidents shall be kept for at least 40 years.

5.6 Updating the Asbestos Register and Management Policy

The Estates Risk Team will ensure the asbestos register for each building is updated based on investigation, sampling and remedial works carried out and on information provided during review. AMP 6 details the procedure for ensuring that the asbestos register is kept up-to-date.

5.7 Reviewing the Asbestos Management Policy

The Estates Risk Team shall undertake a periodic review of the Asbestos Management Policy. The review of the policy will include (but will not be limited to):

- Changes in asbestos and other health and safety legislation
- Changes in roles and responsibilities
- Review of statutory documentation

6.0 Emergency Arrangements

The following section outlines procedures to be undertaken in various emergency situations involving asbestos.

6.1 Areas of potential elevated airborne asbestos fibre:

For example:

- Known or suspected asbestos containing materials damaged during works
- Asbestos remedial works cause an uncontrolled release of airborne fibres, for example if an asbestos enclosure is damaged.

All Staff/ Contractors in areas of potential elevated airborne asbestos fibres or who have been made aware of the presence of elevated airborne asbestos fibres should take the following action:

- Stop all work immediately and leave the area
- Seal off and secure the area to ALL persons, posting warning notices to inform people in the immediate area and request that everyone is kept away
- No attempt shall be made to clean up dust, debris or to remove any tools or equipment
- Immediately inform your line manager and the Estates Risk Team, providing full details of the occurrence
- Estates Risk Team will check the Asbestos register to establish whether ACMs are known to be present

- In circumstances where no records are available, the Estates Risk Team shall organise for samples to be taken for analysis by the AA
- The Trust will implement any controls identified by the AA to avoid exposure of ACMs to building users. Encapsulation, treatment or removal of the ACM shall be carried out in accordance with current legislation before the area is re-occupied. See procedure outlined in AMP 3
- The Trust's Incident Reporting System shall be updated by the Instructing Estates Officer outlining the details of the incident and any actions taken
- Full details of these arrangements are contained in AMP 7.

6.2 Additional Information for Areas under the Control of a Principal Contractor

In areas where the 'site' is under the control of a Principal Contractor and ACMs are suspected or discovered the procedures included in the Principal Contractors Health and Safety Plan shall be followed. The Site Supervisor shall immediately inform the Instructing Estates Officer and Estates Divisional Manager responsible for the works and any sub-contractor working in the area of the ACM. In the event that these personnel cannot be contacted, the Site Supervisor shall telephone the Estates Helpdesk during working hours (8.00am - 4.30pm) and the Shift Team out of hours (4.30pm – 8.00am), informing them of the incident.

The following points shall be noted if materials suspected to contain asbestos have been disturbed:

- **Do not** allow works to continue on any materials, which are suspected of containing asbestos
- If suspected ACMs have been damaged or disturbed during work(s) in progress, the materials should be left in-situ, the works suspended and the area isolated pending further investigation
- **Do not** attempt to take a sample. The actual act of sampling asbestos can expose the sampler to dangerous levels of fibres and it is possible to contaminate the surrounding area.
- Samples will **only** be taken by the AA.
- No attempt shall be made to clean up dust, debris or to remove any tools or equipment

6.3 Urgent access required to an asbestos work area i.e. Asbestos Enclosure

For example:

- Plumbers or electricians are needed within an enclosure to carry out emergency services isolation
- Experts are required to enter asbestos work enclosures to give First Aid

In case of an **emergency**, only those persons suitably trained and with appropriate protective equipment, will be permitted to enter a live asbestos enclosure and will be escorted by a Trust appointed LARC – see AMP 10.

6.4 Reporting of Asbestos Exposure under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1997

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

the health of any person. Such situations are likely to arise when work is carried out without suitable controls, or where those controls fail – they often involve:

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

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

Where processes have not been followed, the incident must be reported on the Trust's Incident Reporting System (Datixweb).

Exposure, which exceeds the Control of Asbestos Regulations (NI) 2012 permitted limit, are reportable under RIDDOR as a dangerous occurrence. Such instances shall be reported to Estates Divisional Risk Manager. The Estates Risk Team will be responsible for making a formal report under RIDDOR to the Health and Safety Executive NI.

The Principal Contractor shall report to HSENI where an exposure defined as a Dangerous Occurrence happens on a site under their control.

7.0 Legislation and Guidance

The following legislation and guidance can be referred to for further information:

- The Control of Asbestos Regulations (CAR) (NI) 2012
- The Health & Safety at Work (NI) Order 1978
- The Management of Health and Safety at Work Regulations (NI) 2000
- The Construction (Design and Management) Regulations (NI) 2016
- HSG227: A comprehensive guide to managing asbestos in premises
- HSG247 Asbestos: The Licenced Contractors' Guide
- HSG248 Asbestos: The Analysts' Guide
- HSG264 Asbestos: The Survey Guide
- INDG223 Managing asbestos in buildings: A brief guide.
- L143 Control of Asbestos Regulations 2012. Approved Code of Practice and guidance

8.0 Asbestos Management Procedures

All work undertaken within the estate, which will potentially disrupt the building fabric, must be reviewed for the presence of ACMs.

The following list of Asbestos Management Procedures are outlined in flow chart format in the Estates Procedures & Guidance folder and detail the Trust's control procedures for ensuring that works undertaken take account of and correctly manage any asbestos present.

Procedure Reference	Procedure Name
AMP 1	Management of asbestos for Access
AMP 2	Management of asbestos during Minor Works/ Major Refurbishment/ Demolition/ Maintenance Works
AMP 3	Management of Asbestos Removal Works
AMP 4	Management of Asbestos during Information Services Works
AMP 5	Disposal of Asbestos Waste
AMP 6	Management & Updating the Asbestos Register
AMP 7	Inadvertent Exposure to Asbestos
AMP 8	Non-Removal of Asbestos During Construction Work
AMP 9	Management of Asbestos in Buildings occupied, but not owned or maintained by the Trust.
AMP 10	Emergency access procedure to 'Lockdown area'
AMP 11	Unauthorised access to a 'lockdown area'
AMP 12	Lockdown procedure
AMP 13	Controlled access to an Asbestos Contaminated Area managed by Estates Operations

AMP 14	Asbestos checklist guide working with external design team
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