

Asbestos management, how is yours?



The dangers of asbestos have been widely known for decades, yet it is still the largest occupational health killer in the UK with approximately 5,000 deaths a year attributed to mesothelioma, asbestos lung cancer and asbestosis according to Health and Safety Executive (HSE) figures. To give this some context, that relates to approximately 1% of all deaths in the UK per annum.

With a latency of up to 60 years these fatal exposures to asbestos will for most predate the Regulation 4 'duty to manage' requirements in non-domestic premises of 21st May 2004. However, the projected downward trend in deaths has still not yet been realised, as exposure to asbestos is sadly not a thing of the past.

So where does asbestos management go wrong? Using our decades of experience in reviewing asbestos management procedures for numbers of organisations, read on to learn about the main areas.



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1. Asbestos management reviews

The review process is one of confirming and learning - confirming your process are working and learning how they are or could be affected by any change – which may include change of use or activity in an area, asbestos condition, new information.

We find however that a lack of a robust documented review process is common. Time and again a review is only triggered after something has gone wrong which, while valuable from a learning perspective, is not good for demonstrating compliance or proactive management.

Your review process can include both internal audits/reviews of process as well as external assessments of the effectiveness of your management. It is a high-level review of your whole system covering policies, procedures and performance You should be considering reviews, for example:

- As part of a routine/scheduled internal review of your asbestos management process;
- As a formal external assessment;
- If you change your asbestos management policy/procedures; and
- Legislative or other changes where new requirements or information comes to light.



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2. Checking Inspecting and monitoring asbestos containing materials



All too often asbestos containing materials (ACM) can get forgotten about and left unchecked and/or unmonitored. They can in turn deteriorate over time increasing the risk of fibre release and contamination.

Where your ACMs are located is also a major consideration for the frequency of checking, inspection and monitoring needed. An asbestos insulation board in a door or corridor used regularly needs more frequent checking than a piece of board in similar condition in a loft or plantroom that is only accessed occasionally (although the risk of damage or deterioration to that board going unnoticed is more likely to occur). So, getting the frequency of the checking right is important. Some questions you may want to consider in reviewing yours could be:

- Do you have a designated frequency of inspection for each of the ACM or presumed ACM in your premises?
- Do you have documented evidence that each of your ACM has been regularly checked, inspected and the risk assessment score confirmed or amended as condition dictated?
- Have you had any ACM removed or worked on and has this been reflected in your management system and checking/inspection regime?

Other situations that should trigger a check or inspection could be:

- If contractors are coming to work on an area where you know you has ACM;
- If change of use or activity is occurring in an area where ACM are present;
- Where you are deliberately working on an ACM to remove or repair it for example.
- Any areas of your premises that are excluded from your asbestos survey - how are these being managed and has anything changed?

Remember to update your register and management system too.

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3. Asbestos training

As the Health and Safety Executive (HSE) put it “Every employer must make sure that anyone who is liable to disturb asbestos during their normal work, or who supervises those employees, gets the correct level of information, instruction and training so that they can work safely and competently without risk to themselves or others. There are three main levels of information, instruction and training. These relate to:

- Asbestos awareness
- Non-licensable work with asbestos including NNLW
- Licensable work with asbestos.”

While most people would be covered by the first type of information, instruction and training, it is only people whose work will require them to disturb asbestos containing materials (ACM) or work with high risk asbestos materials that need either of the latter two elements.

When considering what training you need, it should reflect your circumstances, the amount and location of your ACM and the groups of people likely to encounter them and/or disturb them. For example:

- Those people working in area(s) of your building where they may disturb its fabric, or other item which might contain asbestos, need awareness information to understand the risks and in the management process in place. This should include avoiding any activity by them or others that may disturb asbestos.
- Those with the responsibility for managing asbestos within your organisation will need both awareness and management training so they can adequately demonstrate they understand how asbestos will be successfully managed.
- Others may come into contact with ACM on a regular basis and so need additional specific training to manage these risks.

Your asbestos training needs to be tailored to your organisation’s needs, so an employee, facilities/estates/property manager and a groundsman or engineer will all need training on your asbestos management system but to different levels.



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4. Asbestos risk assessment scoring

This is an area that can cause significant confusion. With asbestos, a risk assessment score is calculated from the combined material assessment and priority assessment scores for each of your asbestos containing materials (ACM).

- Your material assessment considers the type of asbestos you have - or presume to have - and its condition. It is based on four factors, product (or debris) type, extent of damage or deterioration, surface treatment and asbestos type; each are scored in an algorithm to provide a total material assessment score.
- Your priority assessment considers the potential for the asbestos - or presumed asbestos to be disturbed/damaged and someone be exposed to any released fibres. It is also based on four factors, normal occupant activity, likelihood of disturbance, human exposure potential and maintenance activity; each are once more scored in an algorithm to provide a total priority assessment score.
- When both scores are added together these provide the risk assessment score and so the basis on which to manage your asbestos. The higher the score the greater the risk.

Surveys with no material assessment can still be found but are increasingly rare, although material assessment with no priority assessments are not uncommon. Inaccurate scoring is another factor as well as third parties completing priority assessments for premises they know little about – and not engaging with the duty holder.

Without both elements your material and priority assessments reliably performed, it is difficult to demonstrate that the asbestos management plan for the ACM in your premises is going to be effective.



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5. Asbestos surveys

An asbestos survey is most people's starting point when considering what they may have in the way of asbestos containing materials (ACM) and so how they need to be managed. Since May 2014, with the introduction of Regulation 4 and the 'duty to manage' requirements in non-domestic premises, many organisations have had their buildings surveyed. Some have had more than one survey, others still rely on that initial report.

The main issues we still find with asbestos surveys are numerous, use this checklist to check yours:

- **Check the date of the survey** - The age of the survey is far too old, and so not to current standards. If your survey is over 10 years old and hasn't been updated, perhaps you should be checking it.
- **Check your survey specification** - Vague specifications can lead to areas being missed or not assessed, were there any in yours?
- **Check the caveats** – As with the above can lead to areas not being accessed or excluded.
- **Does it cover the whole property/estate?** – Some surveys only considered the inside of premises, were the external areas and out-buildings within the environs excluded for yours?
- **Are there any areas of the building "not accessed" noted in the survey?** - Areas not accessed mean you cannot be certain what is in them unless you have revisited your survey. Were there any areas not assessed as part of the work and what has happened to these since?
- **Is there a record of where the surveyor went?** – This not only provides a reference of the areas covered by the survey, but also valuable information of where asbestos is and isn't in the premises. A survey that looks at each room/area and the floor walls and floors provides you with much greater detail on what was there and checked at the time of the work. It is not only a register of ACMs that is important, but letting others know where there is no asbestos as well as where it is.



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- **Were photographs included in the report?** – Photos can remove ambiguity from where the ACM are in a room or area may be, they also help assess ongoing condition or potential changes in it over time. If each ACM or presumed ACM is photographed, you have a catalogue as well as a 'perspective' on what you are managing.
- **Are there floor plans within the survey?** – Annotated floor plans, with photographs not only help identify the extent to which your building has been surveyed, but with photos provide you with usable management information to help develop your asbestos management plan. If you don't have any plans as part of your survey consider updating it, if you do, are they still in date, accurate and reflective of your current layout and ACM present?

As the HSE put it, Regulation 4 is a duty to manage, not a duty to survey, where you have ACM the accuracy of your survey is often a good indication of how effective your management is too.



Assurity Consulting are leading experts in workplace health, safety and environmental compliance. As an independent organisation, we can give you completely unbiased advice and support with most areas of asbestos management, including independent advice, management surveys and training. For more information, please contact us on tel. **+44 (0)1403 269375** or email info@assurityconsulting.co.uk



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