

Asbestos Management Plans – Key Points

- Asbestos is a very useful mineral, but inhaling fibres over a period of time can lead to serious ill health, even death.
- Asbestos has been used in buildings over a long period of time and for many purposes.
- Over many years, laws have been made which control the use of and work with asbestos.
- 3000 people currently dying each year from asbestos-related diseases.
- Research has shown that 25% of those contracting asbestos-related disease are workers in the building maintenance industries. Often these workers have been exposed unknowingly.
- A new regulation has been introduced which will require employers and other duty holders to manage asbestos in premises for which they are responsible.
- Duty holders must first assess whether asbestos is or is liable to be present in their premises.
- If asbestos is identified by an inspection or survey, or there is good reason to suppose that it is present, the duty holders must take further steps to manage any potential risk.
- The first step is to try to quantify the risk by looking at the type of asbestos, where it is, the condition it is in and the likelihood of it being disturbed.
- A written plan then needs to be written which details the measures to be taken to minimise the risk to anyone working on or near the asbestos-containing materials.
- The measures include monitoring the condition of the material, maintaining it and giving information to those who may go near it and to the emergency services. This information could be provided by labelling the materials.
- The plan has to be reviewed regularly and also if there are changes to the premises. The measures have to be implemented.
- ACMs which are in good condition and which are not likely to be disturbed should be left in place and their condition monitored.

Identifying the person(s) to manage your asbestos management plan.

Before work commences on the asbestos management programme, it is important to identify the person within your organisation who will be responsible for the overall management of the programme. The right person for this pivotal role will vary from one organisation to another, depending on the organisational structure, and the roles and responsibilities of the personnel within them. For some companies, the Safety Officer, Occupational Hygienist or SHE (Safety, Health and Environment) Manager may be the appropriate person; for others the maintenance manager or Estates manager may be more suitable. Factors which may affect the appointment include:

- KNOWLEDGE OF THE BUILDINGS AND PROCESSES WITHIN THEM;
- CONTROL OVER CONTRACTORS BROUGHT ONTO SITE;

- KNOWLEDGE OF FUTURE REFURBISHMENT PROGRAMMES;
- KNOWLEDGE AND EXPERIENCE OF ASBESTOS;
- ACCESS TO SENIOR MANAGEMENT TO INFLUENCE DECISIONS;
- ORGANISATIONAL AND IT SKILLS;
- TRAINING REQUIREMENTS.

Training

It is likely that almost all employees will require some training. At this stage it may comprise a general awareness of asbestos and where it can be found on the premises, together with the sort of training being delivered today about what the new law requires.

Later on in the process, training of maintenance personnel in how to work safely with asbestos, as well as training those who will be charged with monitoring ACMs left in place will be needed. Works procedures may have to change to take into account the asbestos management programme, and there will be disruptions to normal work activities if repair or removal work is identified as a necessary management option. The management of a budget or securing the necessary funds to allow the management plan to function will play a fundamental role in the success or failure of the project. This should be addressed as part of the written plan.

Consultation with employees

It is the duty of employers to ensure the health and safety of employees. They will often be able and willing to help you develop measures to do this. Also employers may need to provide some facts to reassure them about the processes being undertaken.

It makes sense to consult with them, to determine whether they have relevant information on the materials used in the building/refurbishment of the premises, and find ways in which you and they can cooperate on the development and implementation of an appropriate asbestos management plan.

a. Safety representatives

If safety representatives have been appointed under the Safety Representatives and Safety Committee Regulations 1977, employers must consult them on health and safety matters. The Regulations also require them to be given access to information relevant to the health and safety of the workers they represent, including any relating to potentially hazardous conditions.

The safety representatives have the right to be consulted on matters affecting the employees they represent. They also have the right to inspect and take copies of any documents relevant to the workplace which the employer is required to keep by virtue of any relevant statutory provision. This means that they should be

consulted about the assessment and they have the right to see any records made in connection with this work.

b. Elected staff representatives

Similar rights and duties are conferred with regard to employees not represented by trade union safety representatives - by the Health and Safety (Consultation with Employees) Regulations 1996.

Requirements of the Management Plan

Once these preparatory areas have been covered, then the process of developing the management plan can be started.

As already mentioned, the information collected following the completion of your management plan needs to be disseminated in the correct proportion to the right people at the right time to be effective.

All employees who regularly work in any building which is known to contain asbestos should be given clear instructions to report any damage or deterioration which is evident to them.

Employees involved in any work on the building should be made aware of the presence of asbestos and the risk to their health if they disturb it without appropriate precautions. They should be made aware of the type and location of the asbestos using the Management Plan, or any other available information.

Similarly, contractors involved in any work on the building should be made aware of the presence of asbestos and the risk to their health if they disturbed it without appropriate precautions. They should be made aware of the type and location of the asbestos using the survey record, or any other information.

If contractors have to work on materials containing asbestos it is important to ensure that their assessment includes precautions to prevent or control exposure to asbestos fibres.

The possibility of finding unrecorded, concealed asbestos material must also be pointed out and contractors told to proceed with caution. If concealed materials are disturbed and it is suspected that they could contain asbestos, then work must be stopped. Need to ensure that you, as the duty holder, are informed so that the management plan and supporting reports can be updated and appropriate action taken.

You will also need to tell anyone installing telephones, computers or any electrical equipment, since they also may disturb any asbestos. Make them all

aware of the asbestos (survey record) and the possibility of coming across hidden asbestos material which might not be recorded.

Contractors' rules may already be in force on the site. These may have to be reviewed or amended to include the information about, or restrictions to be placed on work with or near ACMs.

This information must be given to contractors at the time tenders/quotations are invited. When work is issued to the building maintenance contractor, the information must be provided with the order.

Where an ACM is going to be left in place, some may wish to label the material or colour code pipework that is lagged in an ACM. This may work in a factory environment, but may not be acceptable in a suite of offices. The decision to label or not will in part depend on confidence in the administration of the asbestos management system and whether communication with workers and contractors coming to work on site is effective. If the asbestos register is up to date and control over maintenance workers and contractors is tight, through, for example, the use of permit-to-work systems, then labelling may be seen as unnecessary.

Labelling and colour coding alone should not be relied on as control measures in themselves. It is important that good lines of communication between the managers of the asbestos management system and workers and contractors should be maintained, so that they have access to good, accurate information about ACMs in the building.

Monitoring Management Plans

Employers need to measure how well health and safety systems are working to assess how well these systems are controlling risks. There are two main ways of doing this:

- Active monitoring means having a plan and making inspections and checks to ensure that the measures in the plan are working to achieve the required standard of protection, eg checking that contractors coming into the premises are provided with information about the risks from ACMs and the precautions to be taken working near them. Any ACM - identified or suspected - will need to be inspected periodically to check that it has not deteriorated or been damaged. Decisions on how often this needs to be done can be made by thinking about where the material is, how many people work near it, whether it is easy to reach and might get bumped by trolleys or vehicles, whether it might be damaged by vermin or water leakage or whether it is out of the way. It will need to be checked more often if it is in a place where it might get damaged. The records/drawings must be updated to reflect any changes discovered. As a minimum, the

material should be checked every six to twelve months even if it is in good condition and not going to be disturbed. The details of the system that will be used to check the condition of the material in the plan must also be written down.

- Reactive monitoring means investigating incidents where the plan was not correctly applied to see whether there are changes needed to again ensure that work with or near ACMs does not lead to the disturbance of fibres which could harm people.
- A record should be kept of any monitoring activities.
- Reviews of the management plan will be necessary under two main circumstances, although employers may carry out reviews at any time:
 - A review of the suitability of the plan will be needed if there is significant change in the premises. This may be a change to the process, to the location of staff, to personnel holding duties under the management plan, or to the premises themselves.
 - If none of the above occurs the regulation requires review and revision 'at regular intervals'. The draft ACOP suggests that the plan should be reviewed every six months even if there have been no changes.

The details of the review, when it is made, should be written down including whether the arrangements are still satisfactory or whether any changes are made. Everyone who needs to know should be informed of any changes made.