

STANDARD OPERATING PROCEDURE ASBESTOS

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VALIDITY – All local SOPS should be accessed via the intranet

CHANGE RECORD

Version	Date	Change details
1.0	July 2019	New SOP
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1. Introduction

This document is prepared for the management of Asbestos and Asbestos Containing Materials (ACMs) within the estate of Humber Teaching NHS Foundation Trust. It is reflective of the intention and statements within the Trust's Asbestos Management Policy.

It is the Trust's strategy and responsibility to comply with health and safety legislation applicable to Asbestos under current statutory requirements with the intention, as far as reasonably practical, to ensure that all persons suffer no harm from the presence of asbestos on the Trust estate.

Asbestos management is as reflected in the policy determined under four categories:

- Assess
- Record
- Inform
- Monitor

Assess: Asbestos becomes a hazard when exposed or disturbed, the risk from ACMs can be controlled once an assessment has been carried out generally through a condition survey of all buildings.

Record: Once assessed the location and condition of all known or presumed ACMs must be recorded, with regular review and update of all records. Records should also be amended due to removal, re-inspection, disturbance and subsequent change of condition. All aspects of Asbestos management such as training of personnel, permit issue etc., should also be recorded. All records should be clear concise and accessible to all who are at risk of exposure.

Inform: Once concise records are compiled, they will be made available to all parties concerned who may be exposed to the Asbestos risk in the estate. Records will be maintained for reference on each site and also retained within the Estates Department; this will take the form of both hard and electronic copies. Information will be presented in the form of training to relevant parties where required, with site inductions forming an integral part of the information dissemination.

Monitor: As per relevant guidance and codes of practice, information, policies and procedures, safe operations of work, training, records, audits will be reviewed, and revisions sanctioned by the responsible persons and the Trust's Asbestos Management Group. Monitoring will ensure the asbestos strategy is implemented to mitigate asbestos risk.

Humber Teaching NHS Foundation Trust fully recognises the serious risk imposed by the presence of Asbestos on the health and safety of all persons engaged on the Trust estate, it also recognises the requirement for effective management and control of Asbestos exposure risk. This SOP will identify how the Trust controls the hazard of asbestos on the estate to comply with Regulation 4 Control of Asbestos Regulations (CAR) 2012, commensurate with HSE Approved Code of Practice (ACOP) L 127, L 143 and Guidance note HSG227 and industry best practice.

Hard copies of surveys and information relating to ACMs are to be retained on each site within the Safety Folder. Hard and electronic copies of information pertaining to the broader Trust estate will be available from the Estates Department, controlled and managed by delegated asbestos Responsible and Nominated Persons. This information should be available to **all** persons involved with work on the estate, where assurance on ACMs is required.

2. Scope

Regulation 4 of the Control of Asbestos Regulations 2012 requires duty holders to manage the risk from asbestos in non-domestic premises. The duty holder is defined in the regulations as being

those that have contractual maintenance or repair responsibilities, or in the absence of a contract or tenancy, those that are in control of the premises.

Duty holders must therefore:

- Take reasonable steps to find materials likely to contain asbestos and to check their condition.
- Presume that materials contain asbestos unless there is strong evidence to suppose they do not.
- Make a written record of the location and condition of asbestos (and presumed ACMs) and keep the record up to date.
- Assess the risk of the likelihood of anyone being exposed to asbestos from these materials.
- Repair, encapsulate or remove any material that contains or is presumed to contain asbestos, if necessary, because of the likelihood of disturbance, and its location or condition.
- Prepare an Asbestos Management Plan (site-specific) to manage that risk and put it into effect to ensure that:
 - Information on the location and condition of ACMs is given to people who may disturb them during work activities
 - Any material known or presumed to contain asbestos is kept in a good state of repair
 - Monitor the condition of known and presumed ACMs.
- Review and monitor the Asbestos Management Plan, and the arrangements made which facilitate this.

3. Duties and Responsibilities

Chief Executive

Has overall responsibility for the health, safety and welfare of all Humber Teaching NHS Foundation Trust staff, patients, visitors, etc. This will include compliance with all Statutory Instruments and Approved Codes of Practice relating to the safe management of asbestos products.

Executive Director of Finance/Senior Information Risk Owner

Has the delegated responsibility for the health and safety of all personnel who may come into contact with asbestos products. They shall ensure that appropriate policies and strategies for the safe management, removal and disposal of asbestos related products are in place, maintained and correctly executed.

They are responsible for seeking sufficient resources to be made available to the Estates Department with the aim of ensuring that the duties outlined in this policy are carried out.

In the event that sufficient resources are not available, prioritisation of allocation of expenditure will be agreed via the relevant approval processes.

They will work closely with the Deputy Director of Estates and Facilities and the Estates Operations Manager.

Responsible Persons

Humber Teaching NHS Foundation Trust's responsible persons are:

- Estate Operations Manager (Lead)
- Estates Officer (Building)

The responsible person(s) is responsible for understanding legislation relevant to this policy and for working closely with senior estates and capital development project managers/officers to ensure

compliance with policies and procedures relating to asbestos and that staff and contractors are familiar with and comply with all relevant sections of Humber Teaching NHS Foundation Trust's Asbestos Management Plan and Standard Operating Procedures.

The responsible persons are responsible for ensuring staff and contractors check estate records for any known asbestos before commencement of any work likely to disturb the fabric of any building pre-2000. They are also responsible for the identification and prioritisation of asbestos removal/encapsulation schemes and the provision of Personal Protective Equipment.

The responsible persons must be trained in the necessary precautions and procedures relating to asbestos and must be proactive to ensure the Trust remains up to date with all legislative and best practice developments. They will need to keep up to date reference material, for use by themselves and other Trust staff in managing asbestos. These should include as a minimum:

- Approved Code of Practice (ACoP) L143 'Managing and working with asbestos.
- HSG 227 'A comprehensive guide to Managing Asbestos in premises.
- HSG 247 'Asbestos: The licensed contractors' guide'.
- HSG248 'Asbestos: The analysts guide for sampling, analysis and clearance procedures.
- HSG 264 'Asbestos: The survey guide'.
- HSE 210 'Asbestos Essentials Task Sheets'.

The responsible persons will have a wide range of duties as set out in the Asbestos Management Plan and Standard Operating Procedures. The responsible person(s) will be responsible for:

- The management of re-inspection surveys and periodic inspection in high-risk areas as identified on the building management plans
- The production and maintenance of a written record of the locations of asbestos and presumed ACMs
- The production of a register of ACMs and keep it up to date which will include the location, condition, maintenance arrangements and details of removal for all ACMs from within the Humber Teaching NHS Foundation Trust Management plans
- Working with appointed consultants to assess the risk of exposure and document actions necessary to manage the asbestos
- Training staff to oversee the Asbestos Management Policy
- Reviewing the conditions of all ACMs on Trust property at a frequency representative of their risk and update the asbestos register as required
- Making current and appropriate information available to those who may come into contact with or disturb ACMs
- Providing relevant information, training and supervision to all Trust staff and contractors
- Liaison with landlords regarding asbestos

Nominated Officers

The nominated officers will assist the responsible persons in their duties and complete all relevant activities on behalf of the Trust; ensure the contents of this policy are fully compliant, implemented and reviewed as specified within.

Humber Teaching NHS Foundation Trust's Nominated Officers are:

- Deputy Director of Estates and Facilities
- Estates Officers (Projects)

If a nominated officer believes the policy (or any parts within) cannot be implemented, they will notify the Responsible Persons. The Nominated Officers are to monitor that the policy meets the requirements of current legislation at all times and escalate any departures or concerns to the responsible person.

The Deputy Director of Estates and Facilities will specifically:

- Ensure that no materials containing asbestos are used in any development work
- Ensure that all capital projects carried out on buildings built prior to 2000, have an Asbestos Refurbishment/Demolition survey carried out (where required), and that any asbestos works are carried out in line with all current asbestos regulations and guidance, and that the Responsible Persons are made aware of any such work to ensure compliance.
- Ensure all contractors and sub-contractors working on projects are competent and qualified to undertake the work specified and are up to date with their relevant Asbestos training

Humber Teaching NHS Foundation Trust Directors and Line Managers

Directors and line managers are managerially responsible for organising health and safety matters within their area/locality. The Trust's Health and Safety Policy outlines their responsibilities in more detail. In addition, they will:

- Ensure that all departments within their areas of responsibility are adhering to this and other health and safety related policies and procedures
- Ensure that all tenants and other bodies using Trust premises within their areas of responsibility are aware of this policy and procedure
- Ensure an effective line of communication is maintained within their locality/area for all matters relating to this policy
- Respond to reports and requests from their line managers to take appropriate remedial action to minimise risks
- Identify and allocate resources, both human and financial in order to comply with this policy

Contractors

Must ensure that they and any sub-contractors reporting to them:

- Are competent and qualified to undertake the work specified and are up to date with their relevant Asbestos training
- Report to the Estates department or specific building's reception, sign in and check the Asbestos Register
- Comply with the relevant sections of the Trust's Asbestos Management Plan and Standard Operating Procedures, other relevant Trust policies and procedures and current health and safety legislation

4. Procedures

4.1. Strategy for Compliance

Current Status

Humber Teaching NHS Foundation Trust has continually surveyed its estate with regards to asbestos containing materials (ACMs). This has usually taken the form of management surveys for new premises or acquisitions which pre-date 2000, and regular re-inspection surveys for those sites which are subsequently found to contain ACMs. Current practice is that all types of asbestos surveys (be that management surveys, annual re-inspections or surveys associated with capital demolition or refurbishment works) are undertaken by suitably qualified and accredited parties, and that UKAS accreditation is always seen as a minimum in this regard.

Following asbestos surveys of any kind, the relevant asbestos information is compiled and recorded in electronic format and stored within the appropriate folders and drives to which only the appropriate persons have access, as such the information is shared and disseminated through these media to all parties involved with the estate.

For site specific information, such as the latest re-inspection report and updated asbestos register, hard copies of surveys and information relating to ACMs are to be retained on each site within the Safety Folder. Hard and electronic copies of information pertaining to the broader Trust estate will be available from the Estates Department.

All information will ultimately inform the Trust's Asbestos Management Plan as a requirement of Regulation 4 CAR 2012 & ACoP L127, 'The management of asbestos in non-domestic premises', the Trust's current practice ensures that site specific management plans can be developed, reviewed and updated by the relevant person(s) on behalf of the Trust.

Re-inspection surveys will update the Risk assessment score for each ACM as recorded to comply with HSG 264 (Asbestos: The Survey Guide) and HSG 227 (A comprehensive guide to managing asbestos in premises).

The Risk Assessment score is derived from the Material Assessment carried out by an accredited Asbestos surveyor (UKAS accredited), along with the Priority Assessment as discussed with the Trust.

Assessment Algorithms are utilised to carry out these assessments and are found in Appendix C of this plan and examples available on HSE web site, link below:

http://www.hse.gov.uk/asbestos/assets/docs/materials-priority-scoring.pdf

Appropriate training will be undertaken under the regulation (CAR 2012), by all staff whose work exposes them to or have management responsibilities associated with asbestos; this will be at individual level commensurate with duty land at intervals as laid down in the Asbestos Management Policy.

4.2. Asbestos Records

Asbestos Management Plan

The Control of Asbestos Regulations (CAR) 2012 requires all duty holders as a part of their ongoing asbestos management to have a written Asbestos Management Plan. This document is site specific and details what steps should be taken to effectively manage all items of asbestos; it is specifically written for all Humber Teaching NHS Foundation Trust owned or controlled premises and cannot be transferred. It will also detail all assessments made of ACMs, and will give recommendations, priorities and deadlines for actions or remediation works necessary (may require a capital application to support financial cost).

The Asbestos Management Plan will be available for reference and use to all those who plan, supervise or carry out maintenance works or special projects on any part of the Trust. In addition, it will also be made available for staff and contractors upon request.

The Asbestos Management Plan master copy will be held by the Asbestos Responsible Person (Lead) based within the Estates Operations Department, Mary Seacole Building, Willerby Hill. A hard copy will also be available within the Safety Folder on the relevant site, and an electronic version will also be held within the electronic site folder on the Estates public drive, accessible to all persons within the Estates team who are involved with work across the estate.

Re-inspections

Re-inspections for asbestos are to comply with Regulation 4(9) of the Control of Asbestos Regulations 2012.

The considerations to be reflected within the Asbestos Management Plan for controlling the risk shall include adequate measures for "monitoring the condition of any asbestos or any substance containing or suspected of containing asbestos".

Regular re-inspections will provide the monitoring and shall take place at regular intervals (at least annually) on each site, these re-inspections shall constantly monitor for any change, deterioration or damage of materials.

Re-inspection surveys will be constantly reviewed, and future frequency based on the original management survey and updates of findings and subsequent surveys recorded within the relevant Asbestos Management plan.

Asbestos Register

Information regarding the location and condition of asbestos within the Trust's properties will been recorded within the Asbestos Registers held for each site.

Any subsequent re-inspection reports and the Asbestos Management Plan will be read in conjunction with the original asbestos management survey.

Training Records

Records of training, site inductions and training certificates received will be held within the Estates Department. Contractors and new starters will receive site induction information on Asbestos; contractors should also have and make available all training records for working on the Trust estate.

Asbestos Rectification

Records of all asbestos removal, encapsulation with certification to the estate are to be added to the register and also updated within the Asbestos Management Plan for the applicable site.

Laboratory Reports

Reports of survey and removal testing undertaken on the estate will form part of the recorded information and be updated on further testing.

Approved Contractors

Only approved and licensed asbestos contractors are to undertake asbestos related work. Checks will be carried out for each contractor regarding license details, insurance, Health and Safety Policy, training records and other relevant information (i.e., UKAS accreditation for the specific activity or task).

Records of Exposure – Incidents

It is essential that these records are collected and recorded formally (i.e., Datix). The Trust should only keep copies of these incidents particular to their employed staff as asbestos contractors are expected to keep their own employee records.

Control of these records are confidential and particular to each individual concerned, who also have right to access these records at any time.

Updating Information

It is essential that all records of an asbestos related nature are reviewed and updated regularly.

Generally, but not exclusive to.

- All removal and or rectification work
- All re-inspections of the estate
- All training, site inductions related to asbestos work to the estate
- All accidental or untoward disturbance of asbestos to the estate
- All supplemental asbestos information that is made available, i.e. refurbishment & demolition surveys
- All risk assessments and method statements generated for tasks to be carried out
- All changes to management and duty holder personnel with change in contact details
- All changes to asbestos management structure of Humber Teaching NHS Foundation Trust

• New procedures developed for the management of asbestos

4.3. Location of Asbestos and ACMs across the Estate

Historic asbestos surveys have identified the presence of a number of asbestos containing materials (ACMs) throughout the estate.

Standard Operating Procedure is to direct all persons intending to carry out work on the Trust estate to consult with Estates, the hard copy or electronic database of the asbestos register, as well as any local Asbestos Management Plan to identify any asbestos within the planned work area and ensure that a safe and controlled method of work is achieved, taking the above information into consideration.

To maintain a position of assurance and safe working, this is a requirement prior to planning, arranging or commencing ANY work on, or which will disturb the fabric of the Trust's buildings.

Building contracts including major refurbishment will need more in-depth information about the project area. In these instances, a refurbishment and demolition survey as a minimum is required.

IF THERE IS ANY DOUBT ALWAYS CONSULT A RESPONSIBLE PERSON OR NOMINATED OFFICER.

4.4. Assessment of Asbestos

Initial Assessment

To comply with the requirements of CAR 2012, Humber Teaching NHS Foundation Trust has undertaken asbestos surveys of its estate and the results compiled and stored on its register.

These surveys consist of two types of assessment:

- Material Assessment (see Appendix A)
- Priority Assessment (see Appendix A)

These comprise the overall risk assessment and are developed from scoring tools as exemplar algorithms detailed in the HSE suite of documents: http://www.hse.gov.uk/asbestos/assets/docs/materials-priority-scoring.pdf

Risk Assessments have been developed for all known areas of the estate for the identification of Asbestos and ACMs, these are available from the asbestos manager within the Estates Department. If an area of the estate has not been surveyed for asbestos or the information is out of date, the procedure as part of the Standard Operating Procedure and as per the Implementation of Asbestos Procedures (Section 8), where "No Access" is denoted on the surveys, then asbestos must always be "Presumed"

Special Assessment

All planned maintenance, refurbishment, building, demolition or works that may disturb or expose suspected or known asbestos will not take place until a task assessment is reviewed by a competent person to comply with Regulation 4 CAR 2012, with the aim of establishing if asbestos will be exposed by any work to take place and the protocol to be taken to continue safely. All personnel carrying out maintenance activities will consult the asbestos register prior to commencing their tasks to determine any asbestos exposure risk and if so, risk assess and employ safe working procedure, a record of this consultation should be made.

Where work is carried out by contracted labour, awareness is to be given by means of formal induction and task description. Assessments will also be required following any accidental disturbance or exposure of suspected ACM. Assessments for activities as described in this

Standard Operating Procedure, inclusive of safe working, risk, reporting of disturbance, exposure and emergency procedures, any such information should be clearly communicated to all parties.

Ongoing Assessment

The Trust will carry out regular re-inspections (at least annually) for all known ACMs, in accordance with CAR 2012 for effective monitoring and recording purposes.

Procedures should also be reviewed, monitored and audited to mitigate all risks; this applies to all information, including this SOP and the site-specific Asbestos Management Plans.

4.5. Re-inspection and Monitoring Arrangements

The Humber Teaching NHS Foundation Trust Responsible Persons and Nominated Officers shall ensure that the following re-inspection and monitoring arrangements are in place.

Mark and Manage

There is no statutory obligation to label ACM once their location is known. The statutory duty is to manage the ACM and to ensure persons are not accidentally exposed. This can be achieved by having arrangements in place whereby asbestos is marked on building drawings that become part of a Permit to Work or other management system. The arrangements should ensure that the drawings and register are consulted prior to any work being carried out in the building; this is known as a "Mark and Manage" system. Integration of survey information with existing information would be practical.

All plant and service areas that have been found to contain asbestos shall be marked up on the entrance door. Clinical, ward and public areas will be marked with labels advising contractors against disturbing the material and to contact the estates department.

ACM Left In Situ

These shall be re-inspected in accordance with the recommendations and the database updated accordingly. Unless the ACM is of low risk, the re-inspection interval shall be no more than every 12 months. The database shall be used to record the updated information. A competent person, either in-house or external consultant, will carry out re-inspections.

Following Asbestos-Related Work

Responsible Persons and Nominated Officers shall ensure that following asbestos removal and/or remedial work, the database is updated accordingly. This may involve employing a competent consultant to undertake this on their behalf.

Schedule of Re-inspections and Monitoring

The information regarding the listing of ACMs can be extracted from the asbestos survey database held by the Estates Department.

4.6. Implementation of Asbestos Procedures

This should be read in conjunction with Humber Teaching NHS Foundation Trust Asbestos Management Policy, which can be viewed on the Trust intranet.

Discovery of Suspected ACM

All managers, including maintenance and building operatives and those with specific responsibilities, shall be informed in writing of the procedure to be followed upon the discovery of a suspected ACM.

Maintenance and building operatives, as well as those with specific responsibilities shall attend an arranged session where the procedures are described in detail with a question and answer discussion.

This will typically require action/review in consideration of the following:

- Reporting internal (i.e., Datix)
- Reporting external (RIDDOR)
- Assessment of risk for staff or contractors working on site (need for securing area or location)
- Operational impact (for site) for any security actions deemed necessary
- Sampling of material to confirm whether it is an ACM
- Requirement for air sampling
- Potential remediation works required (include funding)
- Agree future communications and delegated actions
- Identify strategy for update and review (confirm next meeting)

Control of Building Work and Maintenance Tasks

Ward and departmental managers, including maintenance and building operatives and those with specific responsibilities, shall be informed in writing of the procedure to be followed for the control of building work and maintenance tasks. Maintenance and building operatives, as well as those with specific responsibilities shall attend an arranged session where the procedures are described in detail with a question-and-answer discussion.

4.7. Dissemination of Information

Provision of Information

In order to satisfactorily manage ACMs within the premises, all maintenance and building work will be controlled so that the presence of ACMs is verified before any work begins. Relevant information, assessments and method statements for all works on or within the Trusts buildings, must be afforded through verification of site folders (asbestos register) or confirmed/notified where required through the relevant Responsible Person or Nominated Officer, this will be satisfied in **all** cases **before** any work shall commence.

The relevant Responsible Person or Nominated Officer shall then ensure that information regarding the presence of ACMs is made available for the areas to be worked on/in, as well as any other staff or contractor who may visit to carry out any other works on the estate.

Where appropriate, and this may be necessary for projects and buildings which are significant in their size and nature, the Responsible Person or Nominated Officers may implement a Permit to Work system to control the risk to staff, maintenance workers and external contractors during the work they undertake.

It is likely that such projects will require a refurbishment/demolition survey and allowance should be made in projects to account for this.

The objective of these systems is to ensure that the workers are prevented from being unknowingly exposed to airborne ACM or exposing others nearby.

There is a specific requirement within Regulation 4 (9) of the Control of Asbestos Regulations 2012 to ensure that information regarding ACMs is also made available to the emergency services. The ACOP (L127) for Regulation 4 suggests that the Fire and Rescue Service in particular are most likely to come into contact with ACMs. It recommends that they should be contacted to see what information they require, in what form they would like it and if they would like the information to be sent to them.

Control of Work

The following relates to the control of works:

Procedure for the management of asbestos during maintenance and minor building works.

- The Estates Department arranges or is made aware of the required maintenance and minor building works.
- The Estate Department, via the Responsible Persons or Nominated Officers, advises the Estates Operations Manager of the planned works.
- The Responsible Persons or Nominated Officers (inclusive of the Estates Operations Manager) will discuss and agree delegated tasks and control measures.
- In some cases, departmental installation tasks and other non-estate work are controlled by the relevant departmental managers.
- The Responsible Persons and Nominated Officers will ensure the implementation of the necessary induction/training system so that the relevant departmental managers can advise any contractors under its control whether asbestos may be present in the areas in which they will be working. Information and guidance pertaining to asbestos will be included within the works order.

Asbestos Waste

 The organisation does not dispose of asbestos waste per se but utilises the contractor removing the material to dispose of said waste as per CAR 2012 ensuring its and our responsibilities are met and all regulations are followed including that relevant waste consignment notes are received and filed for audit.
 Further detail of these requirements can be found following the link Disposal of Asbestos Waste em9.pdf (hse.gov.uk)

All disciplines in addition to Estate Operatives and Capital Development staff that employ contractors on behalf of The Trust should ensure that the contractors are instructed to report to Estates Department to go through the Asbestos Register (including site folders), associated paperwork and permits prior to starting work on site. The operation of the system should be monitored and reviewed.

Procedure for the management of asbestos during Capital Projects:

- The Estates Capital Project Team advises the Operational Estates Department that major building works are planned.
- The Estate Department, via the Responsible Persons or Nominated Officers, advises the Estates Operations Manager of the planned works.
- The Estates Operations Manager needs to ensure that the Estates Capital Project Team has a written procedure for controlling asbestos during major works. This can be incorporated into any job specification, tender documents and/or the pretender health and safety plan and implemented.

4.8. Monitoring and Reviewing the Asbestos Management Plan

The key objective of the Asbestos Management Plan is to reduce the risk of exposure at any given site (management plans are site specific). If it can be demonstrated that the risk from ACMs within Humber Teaching NHS Foundation Trust is under control, the Asbestos Management Plan will be fulfilling its intended purpose.

This Asbestos Management Plan will be reviewed by the Asbestos lead every six months to ensure that it remains effective. This may not mean that any changes are necessary, but rather that all current provisions are appraised, checked and audited and that any changes which may make them more efficient are discussed and implemented where necessary.

Humber Teaching NHS Foundation Trust will carry out the following to ensure this remains a valid document and that the risks from asbestos are being adequately assessed:

- Ensure that all recommended actions within this document are undertaken within the given timescales. Any action points should be resolved, and the outcome recorded.
- Regularly update the Asbestos Register and all other Asbestos Records as soon as new information becomes available as surveys are completed. This should be undertaken by the Responsible Persons and Nominated Officers, so that complete and accurate asbestos records can be maintained and controlled at all times.
- Update the Asbestos Management Plan at a suitable interval.
 - In accordance with the CAR 2012 and ACOP this management plan should be reviewed at intervals of six months (minimum), even if there have been no changes.
- Ensure the plan is referred to in all relevant Humber Teaching NHS Foundation Trust inhouse procedures and Standard Operating Procedure documents. All other literature relevant to health and safety within the Trust should refer to the asbestos records where relevant.
- Record lessons learned from previous incidents/exposures to asbestos. Should any incidents occur, then they should be documented, and the relevant procedures examined so that any necessary changes can be incorporated to prevent the same happening again.
- Ensure changes to the structure of the sites or Humber Teaching NHS Foundation Trust are adopted and updated in the plan. This plan must remain relevant and applicable to all site functions, and be updated to incorporate any new procedure

5. Monitoring and Audit

The director of finance will be responsible for monitoring the effectiveness and reviewing the implementation of this document, regularly considering its suitability, adequacy and effectiveness taking into account legal development and changes in the Trust's business. Any improvements identified will be made as soon as possible.

6. References

- Health and Safety Policy
- Asbestos Management Policy

HSE.GOV. (2014). Construction (Design and Management) Regulations (CDM) 2015. http://www.hse.gov.uk/construction/cdm.htm

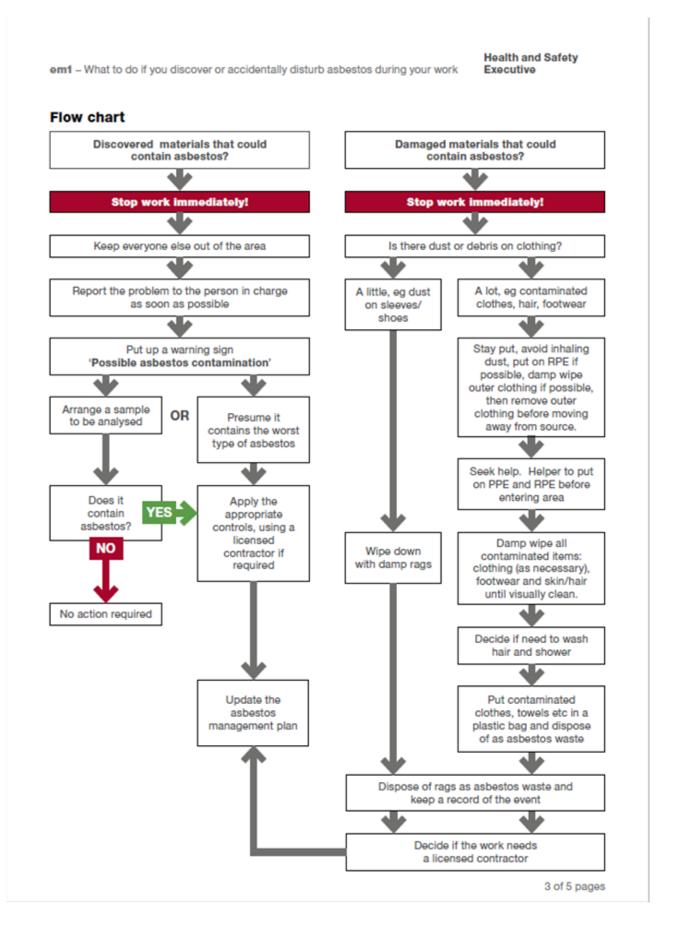
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Humber Teaching NHS Foundation Trust Asbestos (SOP19-016) Version 2.0, March 2023

Appendix B: Survey Type Decription

Management Survey

This is the Standard Survey to establish and is identify the presence of ACMs in the estate, this type of survey whilst not fully intrusive assesses the ACMs in relationship to general and future maintenance activities. This type of survey should identify as reasonably as practical by sample and testing the presence or absence of ACMs.

All estate buildings should be accessed and inspected as far as is reasonably practical. Presumption of ACMs on inaccessible areas should be the default position however this should be managed appropriately.

This type of survey should be carried out by licensed and accredited Surveyors.

Refurbishment and Demolition Survey

This type of survey is intended prior to any refurbishment, change or demolition to an estate building. It is used to locate any further ACMs to a building already surveyed with unexposed or "presumed" ACMs.

It is a fully intrusive survey and will affect the fabric of any building it is carried out in, inclusive of some destructive inspection.

This survey would also be a considered option prior to any large-scale removal or replacement of Building Services plant.

Prior to any project work to building change or demolition to comply with CDM regulations this type of survey should be employed which will also assist with the Tendering process or management prior to the intended works being carried out.

This type of survey should only be carried out (except for exceptional circumstances) within an unoccupied building.

A specialist surveyor would be expected to carry out this type of Survey, duly accredited.

Appendix C: Non-Licensed Work, Notifiable Non-Licensed Work and Licensed Work

As a guide to requirement of notification to the Health and Safety Executive for works being carried out, the Control of Asbestos Regulations (CAR) 2012 now splits the original non-licensed work category into two, creating a third category of work known as "notifiable non-licensed work" (NNLW). Work falling into NNLW will no longer benefit from exemptions.

Non-licensed work	Notifiable Non- licensed work	Licensed work
Compliance with risk assessment	Notification before work starts	Licensing
Control of exposure	Compliance with risk assessment	Notification to HSE 14 days in advance
Training	Control of exposure Training	designation of asbestos areas
	Emergency arrangements	Compliance with risk assessment
	Medical examination every	Control of exposure
	three years	Training
	Health records	Emergency arrangements
		Medical examination every two years
		Health records
Lower Risk		Higher risk

CAR 2012 now adds the words "**friable**" and "**without deterioration of non-graded material**" to Regulation 3(2) which defines the types of work required to be notified, which requires medical examination and record keeping.

Some types of non-licensed work will now require employers to:

- provide notification of the work.
- ensure workers have a medical examination at least once every three years.
- keep a record of the type and duration of work done with asbestos for 40 years along with copies of all medical records.

Licensed workers will not require an additional medical to carry out notifiable non-licensed work. Such work will now only be **non-notifiable** if:

- the exposure to asbestos of employees is sporadic and of low intensity.
- it is clear from the risk assessment that the exposure to asbestos of any employee will not exceed the control limit; and the work involves:
 - short, non-continuous maintenance activities in which only non-friable materials are handled; or
 - removal without deterioration of non-degraded materials in which the asbestos fibres are firmly linked in a matrix; or
 - encapsulation or sealing of asbestos-containing materials which are in good condition; or

• air monitoring and control, and the collection and analysis of samples to ascertain whether a specific material contains asbestos.

Licensable work with asbestos (from HSE website)

Most higher-risk work with asbestos must only be done by a licensed contractor.

Licensable work with asbestos is work:

- where worker exposure to asbestos is not sporadic and of low intensity; or
- where the risk assessment cannot clearly demonstrate that the control limit will not be exceeded, i.e., 0.1 asbestos fibres per cubic centimetre of air (0.1 f/cm³) (averaged over a four-hour period); or
- on asbestos coating; or
- on asbestos insulation or asbestos insulating board where the risk assessment demonstrates that the work is not short duration work, e.g., when work with these materials will take no more than two hours in any seven-day period, and no one person works for more than one hour in that two-hour period.

Some examples on what types of work are considered to be licensable can be found in the table below, but any decision on whether a particular work activity is licensable or not will need to be based on the risk.

Examples of licensable work

- removing sprayed coatings (limpet asbestos)
- removal or other work which may disturb pipe lagging
- any work involving loose fill insulation
- work on asbestos millboard
- cleaning up significant quantities of loose/fine debris containing ACM dust (where the work is not sporadic and of low intensity, the control limit will be exceeded, or it is not short duration work)
- work on AIB, where the risk assessment indicates that it will not be of short duration

Examples of Notifiable Non-Licensed Work (NNLW) with Asbestos (from HSE website)

Removal of:

- asbestos cement products (e.g., roof sheeting) where the material will be substantially damaged or broken up (e.g., as a result of fire or flood damage)
- asbestos cement products (e.g., roof sheeting) where the material will be substantially broken up, creating significant quantities of dust and debris (e.g., 'dropping' an asbestos cement roof)
- Removal of asbestos paper and cardboard products if not firmly bonded in a matrix

Other work:

- on large-scale removal of textured decorative coatings using steaming or gelling methods (e.g. beyond that required for maintenance activities such as installation/replacement of smoke alarms and fittings)
- minor, short duration work to remove asbestos insulating board as part of a refurbishment project
- minor short duration work involving asbestos insulation, e.g. repairing minor damage to a small section of pipe insulation where the exterior coating has been broken or damaged

Examples of non-licensed work with asbestos (link from HSE website)

- Cleaning up small quantities of loose/fine debris containing ACM dust (where the work is sporadic and of low intensity, the control limit will not be exceeded, and it is short duration work)
- Drilling of textured decorative coatings for installation of fixtures/fittings
- Encapsulation and sealing-in work on asbestos-containing materials (ACMs) that are in good condition

Maintenance work involving:

- asbestos cement products (e.g., on roof sheeting, tiles and rainwater goods)
- asbestos in ropes, yarns and woven cloth
- asbestos gaskets or asbestos rope cords (including removal as part of repair and upkeep of equipment) if this can be done without substantial breakage
- asbestos-containing thermoplastic and vinyl floor tiles, bitumen roof felt, shingles, dampproofing coatings, and mastics
- asbestos-containing felt and paper
- plastic paint coatings, PVC floors, panels and sealing compounds
- asbestos-containing conveyor belts/drive belts, bonded rubber, electric cables
- resin-based ACMs such as friction products (e.g. brake linings)
- painting/repainting AIB that is in good condition

Removal of:

- asbestos cement products, (e.g., roof sheeting and rainwater goods) provided the material is carefully handled/removed without breaking up; this includes work with asbestos cement which is weathered but not otherwise substantially damaged
- small areas of textured decorative coatings using suitable dust-reducing methods, to support other activities such as installation/replacement of smoke alarms and light fittings
- textured decorative coatings provided that this can be done without deterioration of the material, (e.g., if the backing board is carefully cut around to achieve virtually intact removal)
- loosely fixed (e.g., screwed) asbestos insulating board (AIB) panels in order to gain access to areas for other maintenance activities (e.g., under a bath to carry out pipework maintenance, or for access to a ceiling void for repair of lighting). This also includes reattaching the panels after the work is done
- an AIB door with asbestos fire proofing

Short duration work:

- to repair minor damage to AIB
- involving drilling holes in AIB (e.g., when installing shelving)

Other work:

- on other materials containing asbestos (such as paints, bitumen, resins, rubber, etc.) where the fibres are bound in a matrix which prevents most of them being released (this includes, typically, aged/weathered AC)
- associated with collecting and analysing samples to identify the presence of asbestos

Further examples of non-licensed work are available in Asbestos Essentials.

If the activity is licensable, you will require a licence if you are working with asbestos as an 'asbestos contractor' on someone else's premises, or within your own premises using your own employees.

A licence may include conditions requiring the licence holder to achieve specific objectives or restrict the licence holder to specific work. For example:

- for an ancillary task such as scaffolding where the work is licensable
- maintaining air extraction equipment where the work is licensable
- supervisory work with asbestos where the work is licensable.

All licensable work must be notified to the appropriate enforcing authority using the <u>ASB5</u> form at least 14 days before the work starts.

Type of premises/activity	Enforcing Authority
Shops, offices, separate catering services, launderettes, sport, entertainment and recreational activities, exhibitions, church or religious meetings, hotels, camping and caravan sites, wholesale and retail storage	LA (Local Authority)
Factories and factory offices, civil engineering, construction and demolition sites, hospitals, research and development establishments, local government services and educational establishments, fairgrounds, radio, television and film broadcasting, sea going ships, docks, transport undertakings, domestic premises, quarries, farms (and associated activities), horticultural premises and forestries, mines/quarries and offshore installations, licensed nuclear sites	
Railways, railway lines, signal boxes	ORR (Office of Rail and Road)

Enforcing authority to notify based on the type of premises/activity

Summary of tasks – Notifiable Work and Non-Notifiable Work

Wark included as	
Work included as Minor w	
Notifiable Non-	day period or where all persons working does not exceed
Licensed	two hours per seven-day period, for the following tasks
Minor re	· · · · · · · · · · · · · · · · · · ·
works	of "short duration works, e.g., removing AIB panels fixed
	with screws/nails.
Mainter	ance on asbestos cement which is not "short and non-continuous"
work	but exceeds the control limit yet is not licensed work.
Remova	I of asbestos paper and cardboard products not firmly bonded
	in a matrix
	Work involving decorative textured coatings (e.g., Artex)
	which would cause deterioration of the material when
	removed.
	Work on asbestos cement that is substantially degraded,
	and significant breakage is unavoidable, yet is not licensable
	as the control limit is not exceeded.
Work not included as Short, r	on- maintenance work on decorative textured coatings, e.g.,
Notifiable Non- continu	ous drilling holes/inserting screws.
Licensed	work maintenance work on AIB which is in good condition,
	e.g., drilling holes in AIB to attach fittings or pass
	cables/pipes through; repairing very minor damage; lifting
	AIB for inspection purposes.
	work on asbestos cement.
Remova	of decorative textured coatings that can be kept intact by
	"dropping" that material to which it has been applied.
	of asbestos cement that is not significantly degraded.
	of gasket/rope materials without causing damage.

Appendix D: Material & Priority Assessment Tool (Algorithms)

Priority Assessment

Important note: Add the normal occupant activity score to the three (3) average scores from the likelihood of disturbance, human exposure and maintenance activity sections to get a total priority score. This is then added to the material score to give the total overall score from 1 - 24.

These comprise the overall Risk Assessment and are developed from scoring tools as exemplar algorithms, please also refer to electronic version linked below:

http://www.hse.gov.uk/asbestos/assets/docs/materials-priority-scoring.pdf

Assessment factor	Examples of score variables		Score
Accessibility	Usually inaccessible or unlikely to be disturbed	0	
	Occasionally likely to be disturbed	1	
	Easily disturbed	2	
	Routinely disturbed	3	
Extent/amount	Small amounts or items (eg strings, gaskets)	0	
	<u>≤</u> 10 m2 or <u><</u> 10 m pipe run.	1	
	>10 m2 to <u><</u> 50 m2 or >10 m to <u><</u> 50 m pipe run	2	
	>50 m2 or >50 m pipe run 3		
Average of scores for location, accessibility and extent/amount (maximum score of 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	

Assessment factor	Examples of score variables		Score
	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	
Average of scores for numbe use (maximum score of 3)	r of occupants, frequency of use, and average time area	a is in	
Maintenance activity			P
Type of maintenance activity	Minor disturbance (eg possibility of contact when gaining access)	0	
	Low disturbance (eg changing light bulbs in asbestos insulating board ceiling)	1	
	Medium disturbance (eg lifting one or two asbestos insulating board ceiling tiles to access a valve)	2	
	High levels of disturbance (eg removing a number of asbestos insulating board ceiling tiles to replace a valve or for recabling)	3	

Assessment factor	Examples of score variables		Score
Frequency of maintenance activity	ACM unlikely to be disturbed for maintenance	0	
	<u>≺</u> 1 per year	1	
	>1 per year	2	
	>1 per month	3	
Average of scores for type of maintenance activity and frequency of maintenance activity (maximum score of 3)			
TOTAL PRIORITY SCORE (this is the occupant activity score added together with the three average scores) (maximum score of 12)			

MATERIAL ASSESSMENT:

Sample variable	Examples of scores		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 (eg 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	

Sample variable	Examples of scores		Score
	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	
TOTAL MATERIAL SCORE			
(maximum score of 12)			
TOTAL OVERALL SCORE			
(PRIORITY + MATERIAL) (maximum score of 24)			

Completed assessment scores are recorded against each ACM in the asbestos register, higher the priority score the more risk and action required against the item/sample.

Using the Traffic Light System:

High risk	Score 17 - 24
Medium risk	Score 9 - 16
Low risk	Score 1 - 8

Appendix E: Permit to Work Templates

Permits to Work

The two permits listed below are available for implementation by the Trust, these may be required should the following not be suitably covered within the management controls of the specialists appointed to undertake, oversee and manage the works:

Permit to Work – Asbestos – This relates to work that is planned to be undertaken where there is either the potential or planned work to operate on, or be involved in the removal of asbestos within the Trust

Permit to Work – Restricted Access to asbestos contaminated areas – Issued to any contractor brought in to work in an area that has been contaminated by asbestos and as a consequence been isolated.

PERMIT TO WORK – ASBESTOS (page 1 of 3)

This form should be completed by competent persons prior to all work on asbestos including maintenance, refurbishment or demolition works.

Project Ref No.		Date:
Building No./Building Name/Block No:		
Floor: Department:		
Provide description of works to be undertaken:		

SECTION A: Preliminary Stage

No.	Description	Yes	No	Comments/Observations
1	Has the Asbestos Register Management Database/Hard Copy Register been consulted?			
2	Detail any asbestos present within the building/work location?			
3	Detail section of database in which records have been obtained and attach relevant copies paperwork.	Drawir No.(s)		
	These should be still attached in the event of no asbestos being identified.			
4	Is a refurbishment/demolition survey – INTRUSIVE/DESTRUCTIVE SURVEY required?			
	i.e. Pre-demolition/refurbishment)			
	If No, Give details as to when the survey is to be carried out			
5	Has a refurbishment/demolition survey – INTRUSIVE/DESTRUCTIVE SURVEY been carried out? If No, Give details as to when the survey is to be carried out			
6	Have any further asbestos installations been identified as a result of the refurbishment/demolition survey?			
	Attach copies of all relevant paperwork.			
7	Will the identified asbestos be affected by the works?			
8	Special conditions which must be observed: Is advice required from the Trust's asbestos consultant?			
9	Will it need the services of a licensed asbestos removal contractor?			
10	Have the Trust's asbestos consultants been advised of the works (regardless of their nature) in order that they can update the asbestos register database accordingly?			

PERMIT TO WORK – ASBESTOS (page 2 of 3)

SECTION B: Asbestos Removal/Remedial Stage

No.	Description	Yes	No	Comments/Observations
11	Has a satisfactory method statement been supplied from the licensed asbestos removal contractor?			
12	Are the works to be carried out within a contaminated			Permit No.
	area, requiring a Restricted Access Permit to Work?			
13	Does the removal contractor have all relevant	Metho	d State	ment
	documentation on site?	HSE N	lotificat	ion
		Training records		rds
		Operatives' Medical certificates		
		Equipr certific	ment te ates	sting 🗌

SECTION C: Air Monitoring/Final 4 Stage Clearance Testing

No.	Description	Yes	No	Comments/Observations
14	Is constant air monitoring required throughout the duration of the job? Seek advice from the specialist asbestos consultancy			
15	If no air monitoring or final 4 stage clearance testing is required give details why not.			

SECTION D: Removal/Remedial Works Completion

No.	Description		
16	Has all relevant paperwork been	Waste consignment note	
	completed and handed over to the client's nominated person?	Smoke/Leakage Certificates etc.	
		Certificate of Re-occupation	

PERMIT TO WORK – ASBESTOS (page 3 of 3)

SECTION E: Asbestos Works Completion

Perm	it to be displayed	- location:					
I hav MATE under requir those	ERIALS MANAGE rstand and acce rements detailed in personnel named b	n the Trust's 'ASBESTOS MENT PLAN' and fully pt responsibility for the the Plan. I have inducted below in the requirements of tions detailed above.	AT COMPLETION/HAND OVER: I can confirm that all works approved to be undertaken under the issue of this permit are complete and the requirements of the Trust's 'ASBESTOS MATERIALS MANAGEMENT PLAN' have been complied with.				
1.	Team Leader	Signature & Date	1.	Team Leader	Signature & Date		
2.			2.				
3.			3.				
4.			4.				
5.			5.				
6.			6.				
7.			7.				
8.			8.				
			Completion of the work is verified. The workplace is cleared, and the return of the permit received.				
Issue	ed By:		Issuing Officer:				
	-						
Date from							
Date	Valid to:						
Responsible Officer:		Client's Responsible Officer:					
Signature:		Signa	ature:				
Date	:		Date:				

PERMIT TO WORK: Restricted Access to Asbestos Contaminated Areas (page 1 of 2)

SECTION A: Location and Work Details

Permit Ref No.	Date:	Location permit to be displayed:
Drawing Ref No. (s)		
Sample Ref No. (s)		
This permit is only valid for the lo	ocation detailed below and	is NOT transferable:
Building Name/No./ Block No:		
Floor:		
Department:		
Provide detailed reason for acces	ss into the above location:	
Can access be avoided, give det	ails if not:	

SECTION B: Method Statement & Procedures

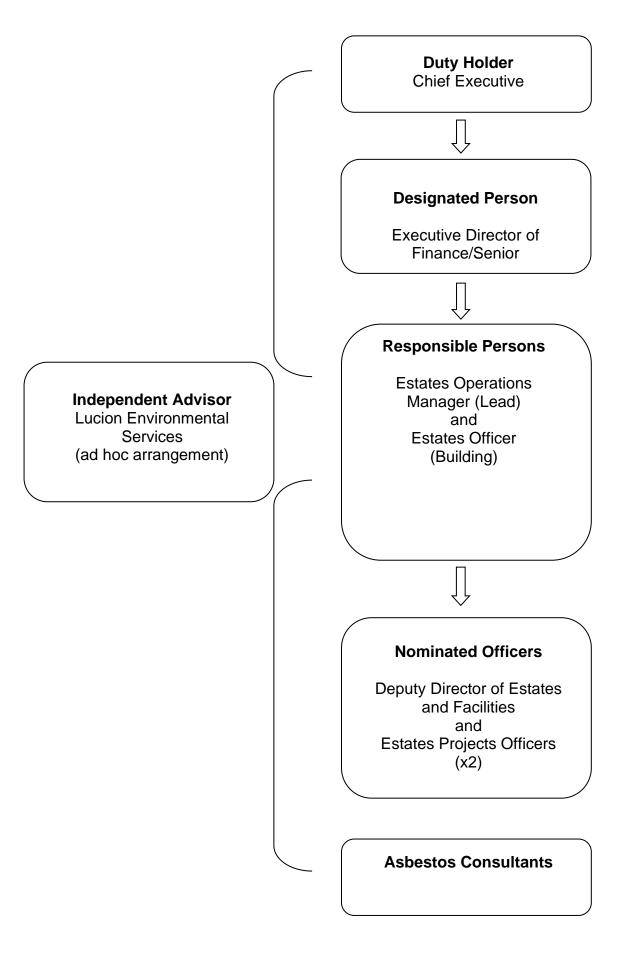
Has the nominated asbestos removal contractor supplied a method statement?	Yes:		No:	
If yes to the	e above	, go to) secti	on D
WORK CANNOT COMMENCE UNTIL THE CONTRACTOR HAS SU STATEMENT AND RISK ASSESSMENT THAT IS JOB			ethoi	D

SECTION C: Acceptance of Building & Estates Procedures (page 2 of 2)

I the supervising/issuing offi	(Print)				
verify that I have given a copy of the Client's "Safe Working Practices within Asbestos Contaminated Areas" to the undersigned.					
I the undersigned confirm I have received a copy of the trusts "Safe Working Practices within Asbestos Contaminated Areas".					
Signature:	Signature: Print: Date :				
Have you read the Safe Working Practices in Contaminated Areas and Yes Yes fully understand it					

SECTION D: Authorisation and Acceptance of Permit:						
Signature of the Client's supervising/issuing offic		Departr	nent:			
Signature:		Print:		Date :		
Signature of person carrying out the works:	Company:					
Signature:		Print:		Date :		
SECTION E: Comple	SECTION E: Completion of Works:					
Signature of the Client's supervising/issuing offic		Departm	nent:			
Signature:		Print:		Date :		
	E REQUIREME	ENTS OF		TATEM	F THIS PERMIT ARE ENT SAFE WORKING	
Signature of person carrying out the works:	Company:					
Signature:		Print:		Date :		

Appendix F: Asbestos Roles and Duties Flowchart



Appendix G: Equality Impact Assessment (EIA)

For strategies, policies, procedures, processes, guidelines, protocols, tenders, services

- 1. Document or Process or Service Name: Asbestos: Standard Operating Procedure
- 2. EIA Reviewer (name, job title, base and contact details): Neil Sykes, Estates Operations Manager, Estates Dept, Mary Seacole Building, Willerby Hill. Tel: 477832
- 3. Is it a Policy, Strategy, Procedure, Process, Tender, Service or Other? SOP

Main Aims of the Document, Process or Service

To ensure that a consistent process is in place for planned and re-active management of Asbestos Containing Materials (ACMs) across our building estate. This applies to both capital project and planned maintenance work, the document identifies the processes and individuals who have responsibilities and duties in this regard.

Please indicate in the table that follows whether the document or process has the potential to impact adversely, intentionally or unwittingly on the equality target groups contained in the pro forma

-			
Eq	uality Target Group	Is the document or process likely to have a	How have you arrived at the equality
1.	Age	potential or actual differential impact with	impact score?
2.	Disability	regards to the equality target groups listed?	a) who have you consulted with?
3.	Sex		b) what have they said?
4.	Marriage/Civil	Equality Impact Score	c) what information or data have you
	Partnership	Low = Little or No evidence or concern	used?
5.	Pregnancy/Maternity	(Green)	d) where are the gaps in your
6.	Race	Medium = some evidence or concern(Amber)	analysis?
7.	Religion/Belief	High = significant evidence or concern (Red)	e) how will your document/process or
8.	Sexual Orientation		service promote equality and
9.	Gender re-		diversity good practice
	assignment		

Equality Target Group	Definitions	Equality Impact Score	Evidence to support Equality Impact Score
Age	Including specific ages and age groups: Older people Young people Children Early years	Low	Historic records are retained. Procedure to be followed to ensure that buildings are maintained in a safe condition, and that management and control procedures are in place for buildings with Asbestos Containing Materials.
Disability	Where the impairment has a substantial and long-term adverse effect on the ability of the person to carry out their day to day activities: Sensory Physical Learning Mental health (Including cancer, HIV, multiple sclerosis)	Low	Policy applies for all groups and is applicable across all of our estate, irrespective of patient profile.
Sex	Men/Male Women/Female	Low	Historic records are retained. Procedure to be followed to ensure that buildings are maintained in a safe condition, and that management and control procedures are in place for buildings with Asbestos Containing Materials. Not gender specific.

Equality Target Group	Definitions	Equality Impact Score	Evidence to support Equality Impact Score
Marriage/Civil Partnership		Low	Historic records are retained. Procedure to be followed to ensure that buildings are maintained in a safe condition, and that management and control procedures are in place for buildings with Asbestos Containing Materials.
Pregnancy/ Maternity		Low	Historic records are retained. Procedure to be followed to ensure that buildings are maintained in a safe condition, and that management and control procedures are in place for buildings with Asbestos Containing Materials.
Race	Colour Nationality Ethnic/national origins	Low	Historic records are retained. Procedure to be followed to ensure that buildings are maintained in a safe condition, and that management and control procedures are in place for buildings with Asbestos Containing Materials. Covers all sites, not specific to any nationality or ethnicity.
Religion or Belief	All religions Including lack of religion or belief and where belief includes any religious or philosophical belief	Low	Historic records are retained. Procedure to be followed to ensure that buildings are maintained in a safe condition, and that management and control procedures are in place for buildings with Asbestos Containing Materials.
Sexual Orientation	Lesbian Gay men Bisexual	Low	Covers all groups
Gender Reassignment	Where people are proposing to undergo, or have undergone a process (or part of a process) for the purpose of reassigning the person's sex by changing physiological or other attribute of sex	Low	Not applicable

Summary

Please describe the main points/actions arising from your assessment that supports your decision.

This is an operational procedure document reflecting actions and procedures to be followed to to ensure that buildings are maintained in a safe condition, and that management and control procedures are in place for buildings with Asbestos Containing Materials.

Consistent practice is in place between the Estates Operations and Capital Project team.

To achieve compliance with statutory legislation, published guidance and approved codes of practice, Humber Teaching NHS Foundation Trust have appointed Responsible Persons and Nominated Officers in place as reflected in the requirements of the procedure.

 The Trust also instructs external professional consultants to provide additional support where necessary.

 EIA Reviewer: Neil Sykes, Estates Operations Manager

 Date completed: 28 December 2022

 Signature: S Leeman