

Asbestos Management and Control – Organisational Roles and Responsibilities

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Asbestos Management and Control - Roles and Responsibilities			
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The organisational roles and a summary of associated responsibilities are given below. The main post-holders with responsibilities are detailed in the Asbestos Management and Control – Roles and Responsibilities Organisational Chart.

1. Chief Executive Ultimate accountability for this policy lies with the Chief Executive who, on behalf of Lothian NHS Board recognises and accepts its responsibility as an employer for providing a safe and healthy work environment for its employees and others including patients, contractors, visitors, and other users who may be affected by its work.

A safe working environment in compliance with current legislation, including the Health & Safety at Work etc Act (1974) will be provided. This will include ensuring that there are systems in place to:

- Identify, evaluate and manage the risks associated with known asbestos containing materials
- Provide sufficient resources for effective staff training relevant to their roles and responsibilities on an annual basis
- Monitor any incidents relating to the release of asbestos fibres via the NHS Lothian Health and Safety Committee and/or Facilities Health and Safety Group
- Review the effectiveness of this policy on a three-yearly basis via the Lothian Partnership Forum

2. Director of Estates and Facilities

The Director of Estates & Facilities has the devolved specific responsibility for the implementation of this policy. In their absence, the Associate Director of Estates & Facilities will deputise.

The Director of Estates & Facilities shall be responsible for ensuring:

- Appropriate resources are allocated to reduce the risk(s) from ACM's, as far as is reasonably practicable

3. Head of Operations (Hard FM)

The Head of Operations Hard FM has the overall delegated management responsibility for operational procedures within premises owned by NHS Lothian by:

- ensuring that NHS Lothian is compliant with its statutory duties in relation to asbestos management
- implementation of this policy
- appointing a competent person to act as Asbestos Co-ordinator
- appointing the Area Manager (Hard FM) and his/her nominated deputy in respect of being the Responsible Person (Asbestos) and thereby responsible for the maintenance of known ACM's within their area
- ensuring that there is an Asbestos Management Plan in place
- reviewing the policy in line with NHS Lothian policy review guidelines

- amending the policy as a result of any legislation changes or following any recommendations as a result of an adverse incident
- communicating to the Director of Estates & Facilities, or others as appropriate, of any significant change which affects the technical aspects of procedures and/or operation of installed services which may contain ACM's

4. Area Manager (Hard FM)

The Area Manager Hard FM has the overall responsibility for the implementation of this policy within their area and the premises therein, including premises leased to and by NHS Lothian. They also have overall responsibility for:

- ensuring compliance with the NHS Lothian Operational Procedure for Managing Asbestos-Containing Materials
- establish an Asbestos Register for their area, including any sites leased to or by NHS Lothian and that it is updated thereafter
- ensuring that ACM's in their area are monitored on an annual basis
- ensuring that appropriate remedial action(s) such as encapsulation, isolation, labelling or removal are undertaken and as appropriate, setting priorities for management
- liaising and co-operating with advice given by the Asbestos Co-ordinator
- conducting suitable and sufficient risk assessments of maintenance tasks
- ensuring that during maintenance or minor works activities, asbestos exposure is prevented or reduced as far as is reasonably practicable
- notifying their Estates Sector Managers, Operational Officers and other Area Managers Hard FM where quality or performance of an asbestos surveyor, asbestos removal contractor or UKAS analyst has been poor or resulted in a high risk incident, and issuing an instruction that such an organisation should only work on NHS Lothian premises under strict supervision
- ensuring any asbestos related incident is reported via the DATIX system in line with NHS Lothian Incident Management Policy
- investigating any asbestos related incident and reporting findings to the Head of Operations Hard FM
- informing their Estates Sector Managers and/or Operational Officers of any improvements to be implemented following the incident investigation

5. Estates Sector Managers and/or Operational Officers

The Estates Sector Managers and/or Operational Officers have the day-to-day responsibility for:

- ensuring compliance with the NHS Lothian Operational Procedure for Managing Asbestos-Containing Materials
- ensuring that during maintenance or minor works activities, asbestos exposure is prevented or reduced as far as is reasonably practicable by reference to the Asbestos Register

- arranging an appropriate survey of the area involved in minor works to determine the presence of asbestos
- prior to appointing contractors, receiving the method statements and risk assessments and, in conjunction with the Asbestos Co-ordinator, ensuring these are suitable and sufficient for the proposed works
- consulting with the Asbestos Co-ordinator for advice regarding any remedial works
- maintain the Asbestos Register for their area up-to-date by recording any changes such as deterioration of condition, encapsulation, removal, etc
- ensuring that any contractors or non-NHS Lothian organisations appointed by them are aware of the NHS Lothian arrangements for managing asbestos
- ensuring that appropriate remedial action(s) such as encapsulation, isolation, labelling or removal are undertaken by an asbestos removal contractor holding an HSE licence
- appointing a UKAS accredited analyst to undertake air monitoring and clearance indicator testing during asbestos remedial works
- undertaking tool-box talks with their employees on an annual basis or within 5 working days of an asbestos related incident

6. Capital Projects Manager and Capital Planning

The Capital Projects Manager and Capital Planning have overall responsibility for the implementation of this policy within their area. They also have overall responsibility for:

- ensuring compliance with the NHS Lothian Operational Procedure for Managing Asbestos-Containing Materials
- ensuring that during projects, asbestos exposure is prevented or reduced as far as is reasonably practicable
- ensuring that the risk assessment(s) are up to date and amending as required for contractors appointed by them
- liaising and co-operating with advice given by the Asbestos Co-ordinator
- notifying their officers where the quality or performance of an asbestos surveyor, asbestos removal contractor or UKAS analyst has been poor or resulted in a high risk incident, and issuing an instruction that such an organisation should only work on NHS Lothian premises under strict supervision

7. Project Team Officers

The Project Team Officers have the responsibility for:

- ensuring compliance with the NHS Lothian Operational Procedure for Managing Asbestos-Containing Materials
- ensuring that during projects, asbestos exposure is prevented or reduced as far as is reasonably practicable by reference to the Asbestos Register

- arranging an appropriate survey of the area involved in the project to determine the presence of asbestos
- consulting with the Asbestos Co-ordinator for advice regarding any remedial works
- informing the Maintenance Team Officer of the extent any changes such as encapsulation, removal, etc to allow the Asbestos Register to be kept up-to-date
- ensuring that appropriate remedial action(s) such as encapsulation or removal are undertaken by an asbestos removal contractor holding an HSE licence
- ensuring that any contractors or non-NHS Lothian organisations appointed by them are aware of the NHS Lothian arrangements for managing asbestos
- ensuring that the risk assessment(s) are up to date and amending as required for contractors appointed by them
- appointing a UKAS accredited analyst to undertake air monitoring and clearance indicator testing during asbestos remedial works

8. Project Manager (Asbestos)

The Project Manager (Asbestos) will be responsible for the overall management of the arrangements contained within this policy and the preparation of the Asbestos Management Plan in conjunction with the Head of Operations Hard FM to whom they will also report.

The Project Manager (Asbestos) will have sufficient authority to undertake their role and work in partnership with the post-holder(s) to ensure that the ACM's within NHS Lothian premises are maintained and that exposure to asbestos is prevented or reduced as far as is reasonably practicable.

The Project Manager (Asbestos) will:

- Advise the Head of Operations Hard FM of any changes to legislation in respect of asbestos
- Assist the Head of Operations Hard FM in amending the policy as required by any changes
- Assist Capital Project Managers and/or any other NHS Lothian responsible person in respect of asbestos management
- Assist the Area Manager Hard FM, Capital Project Managers and/or any other NHS Lothian responsible person with any investigation into asbestos related incidents and provide practical solutions to prevent any future incident(s)
- Provide a source of practical, specialist information to NHS Lothian
- Undertake an audit of the NHS Lothian Operational Procedures for Managing Asbestos-Containing Materials on an annual basis and provide a report to the Head of Operations Hard FM on the findings and include recommendations for improvement as necessary
- Undertake 6-monthly audits of the Asbestos Register to confirm its accuracy
- Assess the asbestos removal contractor's documentation, including HSE licence, medical certificates, training, risk assessments, method statements and plant test certificates

- Assess the quality of the work and the performance of the asbestos surveyor, asbestos removal contractor, and UKAS analyst on-site and report if satisfactory or not to the relevant manager or officer
- Where the quality or performance is poor or results in a high risk incident, the Project Manager (Asbestos) will notify the Area Manager(s) Hard FM and the Capital Projects Manager

9. Asbestos Coordinators

The Asbestos Co-ordinators shall review recommendations made in survey reports, comment on the appropriateness of risk assessments, provide a point-of-contact for licensed asbestos removal contractors and provide support to local operational teams and projects.

10. Assurance Officers

Assurance Officers shall assist through the formulation of policy documents and the auditing of processes.

11. Employees

Employees who have the potential encounter asbestos-containing material during the course of their work will:

- be notified by their line manager
- be required to attend an initial and, thereafter, annual refresher asbestos awareness training
- NOTE - if the employee has previously received asbestos awareness training, the level of understanding of asbestos-containing materials should be established and if found to be satisfactory, initial training may not be necessary. Initial training is compulsory for all “new starts”
- Report any suspected or damaged ACM’s to their line manager, Asbestos Co-ordinator or Area Manager Hard FM. If in any doubt, ASK.
- Refrain from any activity, or activities, which may disturb known or suspected ACM’s.

12. Other Departmental Managers and Officers

Other managers and officers of NHS Lothian, who instruct work on NHS Lothian premises which affects the fabric or surface coatings of the premises MUST contact the relevant Area Estates office for information regarding ACM’s within the relevant building(s).

The Area Manager Hard FM will provide advice regarding locations of known or suspect ACM’s within their area and assess the need for an asbestos survey prior to this work proceeding.

13. Contractors and non-NHS Lothian Organisations

Contractors and non-NHS Lothian organisations will have their own health and safety arrangements including asbestos which they must follow in conjunction with the requirements of this policy. In addition, they must adhere to the NHS Lothian Control of Contractors Policy.

14. Associated materials

- [NHS Lothian Operational Procedures for Management and Control of Asbestos-Containing Materials](#) – Approved by Facilities Policy Review Group
- [NHS Lothian Control of Contractors Policy](#) – Approved by the Policy Approval Group
- [NHS Lothian Adverse Event Management Policy](#) – Approved by the Policy Approval Group
- [NHS Lothian Adverse Event Management Operational Procedure](#) – Approved by the Policy Approval Group
- [Asbestos Management and Control – Organisational Chart](#) – Approved by the Estates and Facilities Policy Group
- [NHS Lothian Asbestos Management Plan](#) – Approved by the Estates and Facilities Policy Review Group

15. Evidence base

Legislation:

- [The Health and Safety at Work Act 1974](#)
- [The Control of Asbestos Regulations 2012](#)
- [Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 \(2012 as amended\)](#)

Health and Safety Executive Guidance and Procedures:

- [L143 – Managing and working with asbestos](#)
- [HSG227 – Management of Asbestos: A Complete Guide](#)
- [INDG223 - Managing Asbestos in Buildings: a brief guide](#)

16. Stakeholder consultation

As per the NHS Lothian Development of NHS Lothian Policies and Procedures – Policies and Guidance for all Employees, an Integrated Impact Assessment has been undertaken, in line with the requirements of the Equality and Diversity Policy and the report is available upon request. This policy has undergone further consultation via the NHS Lothian Consultation Zone and was reviewed with input from NHS Lothian Hard FM staff and the Risk, Quality & Assurance Department.

17. Monitoring and review

This document may be appropriately audited due to risk profile by NHS Lothian Occupational Health & Safety Department. The document will be reviewed, as a minimum, every 3 years, or sooner as a result of any changes in legislation and healthcare facilities guidance or following an adverse incident.