

Management of Asbestos Policy

Approval date:	04/09/25
Version number:	1.5
Author:	Paul Nadin, Compliance Officer- Estates
Review date:	03/09/28
Security classification:	OFFICIAL – Green: unclassified information

If you would like this document in an alternative language or format, please contact Corporate Services on 01595 743069.

Document reference number: CEPOL002

Name of document	Management of Asbestos Policy		
Document reference number	CEPOL002	New or Review?	Review
Author	Paul Nadin, Compliance Officer- Estates		
Information Asset Owner	David Wagstaff, Head of Estates and Facilities		
Executive lead	Brian Chittick, Chief Executive		
Review date	03/09/28		
Security classification	OFFICIAL – Green: unclassified information		

Proposed groups to present document to:		
Health, Safety and Wellbeing Committee	Area Partnership Forum	Staff Governance Committee

Date	Version	Group	Reason	Outcome
21/08/25	1.4	Health, Safety and Wellbeing Committee	C/S	Approved
27/08/25	1.4	Area Partnership Forum	C/S	Approved
04/09/25	1.4	Staff Governance Committee	C/S, FA	Final Approval

Examples of reasons for presenting to the group	Examples of outcomes following meeting
<ul style="list-style-type: none"> Professional input required re: content (PI) 	<ul style="list-style-type: none"> Significant changes to content required – refer to Executive Lead for guidance (SC)
<ul style="list-style-type: none"> Professional opinion on content (PO) 	<ul style="list-style-type: none"> To amend content & re-submit to group (AC&R)
<ul style="list-style-type: none"> General comments/suggestions (C/S) 	<ul style="list-style-type: none"> For minor revisions (e.g. format/layout) – no need to re-submit to group (MR)
<ul style="list-style-type: none"> For information only (FIO) 	<ul style="list-style-type: none"> Recommend proceeding to next stage (PRO)
<ul style="list-style-type: none"> For proofing/formatting (PF) 	<ul style="list-style-type: none"> For upload to Intranet (INT)
<ul style="list-style-type: none"> Final Approval (FA) 	<ul style="list-style-type: none"> Approved (A) or Not Approved, revisions required (NARR)

Date	Record of changes made to document
04/12/2012	Changes made to reflect current names and management structure
08/01/2013	Changes made following review by Liz Sneddon, NHS Fife asbestos advisor
05/01/2013	Names removed from organisational chart after review by H&S committee.
21/03/2025	<p>Latest NHS Shetland Policy template adopted, with content significantly revised:</p> <p>Policy name was 'Asbestos policy'.</p> <p>Reference to Construction (Design and Management) Regulations 2007 (CDM) changed to 2015.</p> <p>Responsibilities updated- Compliance Officer, Responsible Person, Asbestos Coordinator and Health & Safety Lead's duties added, with Appendix 1, Structure Chart amended.</p> <p>HSG227- 'A Comprehensive Guide to Managing Asbestos in Premises' added to the list of reference documents.</p> <p>Principal groups of people to which this policy applies added.</p> <p>Communication Arrangements and Records Management sections added.</p>
04/08/25	v1.4 final approval and version raised to v1.5 for issue

Contents

1. Purpose.....	5
2. Policy Statement	5
3. Introduction	5
4. Policy Application	5
5. Specific Arrangements	6
6. Responsibilities	7
7. Governance.....	9
8. Communication Arrangements.....	9
9. Non NHS Properties.....	9
10. Monitoring Arrangements.....	9
11. Review Arrangements.....	9
12. Records Management.....	9
Appendix 1- Organisational Structure for the Management and Control of Asbestos.....	10
Appendix 2 – Rapid Impact Checklist.....	11
Impact Assessment Summary sheet.....	13

1. Purpose

This policy sets out the arrangements necessary to prevent harm to employees, patients, visitors, the public and contractors arising from exposure to asbestos.

This policy applies to all NHS Shetland employees, students, volunteers and contractors.

2. Policy Statement

NHS Shetland acknowledges the health hazards arising from exposure to asbestos.

NHS Shetland will, so far as is reasonably practicable, prevent exposure to asbestos fibres to employees, patients, third parties and visitor's etc.

NHS Shetland will take a positive approach to controlling and reducing any potential exposure to asbestos fibres through the use of effective control measures and work methods, supported by suitably trained and competent employees and contractors.

3. Introduction

The Control of Asbestos Regulations 2012 and the Construction (Design & Management) Regulations 2015 (CDM) impose specific duties on employers to manage asbestos. These duties are in addition to those imposed by the Health and Safety at Work Act 1974 and the Management of Health and Safety at Work Regulations 1999.

In addition to the above, other (non-exhaustive) sources of regulatory, technical and guidance documentation include:

- The Workplace (Health, Safety and Welfare) Regulations 1992
- Asbestos: The analysts' guide for sampling, analysis and clearance procedures- HSG248
- A Comprehensive Guide to Managing Asbestos in Premises- HSG227
- Asbestos: The Survey Guide- HSG264
- Asbestos: The Licensed Contractors Guide- HSG247
- Asbestos Essentials Task Manual- HSG210
- Managing Health and Safety in Construction 2015 (CDM)- L153
- Best practice guidance for healthcare Engineering SHTM 00
- NHS Shetland Health and Safety Policy HRPOL038

NHS Shetland is committed to complying with the above requirements to ensure it fulfils its legal, legislative and moral duties.

4. Policy Application

The requirements stated in this policy apply to all NHS Shetland owned premises where asbestos is, or may be, present. In addition to the owners responsibilities, the principles of this policy also applies to non-NHS Shetland properties, occupied or worked on by NHS Shetland employees and representatives.

Although not exclusively, this policy principally applies to the following groups of people:

- Estates
- Porters
- Domestic Services
- IT / Telecoms
- Project Managers / Clerk of Works (capital, infrastructure etc)
- Contractors

5. Specific Arrangements

Regulation 4 of The Control of Asbestos Regulations 2012, covers the “duty to manage asbestos” in non-domestic premises. This will be achieved by proactively identifying asbestos in buildings through undertaking an assessment on potential exposure using a licensed contractor to remove and dispose of the asbestos, or encapsulate it where the assessment indicates this is appropriate- it has been established that there is no risk to health from the presence of asbestos in buildings where it is in good condition, undamaged and left undisturbed. It is only when there is a release of asbestos fibres from asbestos products that there is a risk.

Risk Assessments will be carried out using the “Priority Assessment Algorithm” in HSG 227 - A Comprehensive Guide to Managing Asbestos in Premises and the material assessment contained within HSG 264 – “Asbestos: The Survey Guide”.

To comply with the regulations, NHS Shetland will:

- Appoint a responsible person(s) to manage asbestos on NHS Shetland premises
- Take reasonable steps to determine, by survey, the location and condition of materials likely to contain asbestos. Note: any future asbestos surveys shall include a 5% independent management survey as per HSG 264 - Appendix 6.
- Engage specialist competent consultants for advice and services associated with asbestos as necessary.
- Presume materials contain asbestos unless there are good reasons not to do so
- Develop, update and retain records of the location and condition of asbestos-containing materials [ACMs], or presumed asbestos containing materials, in NHS Shetland premises.
- Assess the risk of the likelihood of anyone being exposed to fibres from these materials
- Prepare an Asbestos Management Plan, i.e. working arrangements on how the risks from the materials are to be managed, together with the necessary steps to put the plan into action.
- Review and monitor progress against the asbestos management plan periodically
- Provide information on the location and condition of the materials to anyone who is liable to work on or disturb them

- Implement an Asbestos Contingency Plan when required, to deal with any accidental release of asbestos fibres
- Ensure all persons liable to come into contact with asbestos are informed and trained to meet the requirements of their specific needs, duties and responsibilities
- Assess the competence of contractors working on premises where asbestos may be disturbed
- Check and approve the risk assessments and method statements of contractors involved with work that might present asbestos risks
- Monitor the work of all contractors on site when there is a risk of exposure to asbestos

6. Responsibilities

Ultimate accountability for this policy lies with the Chief Executive, with specific responsibility for policy implementation devolved to the Head of Estates, Facilities & Medical Physics (Appendix 1).

The Chief Executive will appoint in writing a Designated Person. They will be responsible for the overall management of the arrangements contained within this policy, together with the Asbestos Management Plan.

Local implementation of this policy will be carried out in conjunction with the Maintenance Manager.

In order to implement the asbestos strategy effectively it is essential that the Asbestos Manager / Maintenance Manager has the necessary authority, resources, competence and knowledge.

No one, apart from the people with the roles and responsibilities listed below, shall instruct any work on the properties covered by this policy that affects the fabric or surface coatings of these properties.

If staff or contractors have any health and safety concerns, or come across what they believe is a dangerous situation or incident, work should be safely stopped prior to reporting it through normal line management structures, the relevant project manager, and if necessary, the Estates Department, without delay.

Position	Responsibility
Chief Executive	The 'Duty Holder', with ultimate accountability for this policy. Delegated responsibility for implementation of policy to the Head of Estates, Facilities & Medical Physics
Head of Estates, Facilities & Medical Physics	The 'Designated Person' with delegated responsibility for full implementation of this policy.

Asbestos Manager / Maintenance Manager	<p>The 'Responsible Person' with management responsibility for operational procedures on NHS Shetland owned premises.</p> <p>Responsible for the implementation and management of operational procedures for the management and control of asbestos during maintenance activities. This involves:</p> <ul style="list-style-type: none"> • Taking responsible steps to ensure NHS Shetland is compliant with all statutory duties in relation to asbestos management. • Implementation and review of this policy, Asbestos Management Plan and related working arrangements • Maintenance of the Asbestos Register together with implementation of Asbestos Contingency Plan • Surveying properties to determine the location of asbestos and monitoring the condition of asbestos in all known locations • Sourcing competent specialist asbestos contractors and consultants as appropriate and required • Supporting the day-to-day working arrangements of asbestos tasks
Maintenance Supervisor	<p>Implementation of operational procedures for the management and control of asbestos relating to maintenance activities.</p> <p>Issuing and maintaining Permits to Work systems as this relates to Asbestos and prevention of exposure to staff and contractors.</p>
Asbestos Coordinator	<p>Reviews survey reports and risk assessments, acts as a point of contact for asbestos removal contractors, and provides support to the maintenance and project teams.</p>
Capital Projects Manager / Clerk of Works	<p>Implementation of operational procedures for the management and control of asbestos during projects under their control, informing of removal and confirmation of any remaining asbestos.</p> <p>Liaison with contractors and sharing of Asbestos related information as it relates to specific project works.</p>
Compliance Officer	<p>Responsible for monitoring compliance and developing and implementing action plans in conjunction with the Estates team</p>
Health & Safety Lead	<p>Provides advice and guidance on Asbestos management arrangements and assist with incident investigations, should this be necessary.</p>

Occupational Health Service	Advisory role in the case of accidental release of asbestos.
------------------------------------	--

7. Governance

This revised policy has been created by the Compliance Officer- Estates, who is accountable to the Head of Estates, Facilities & Medical Physics.

It shall be reviewed and approved by the Asbestos Safety Committee (ASC).

Following approval by the ASC this policy shall be submitted in turn to the 3 groups below:

Health, Safety and Wellbeing Committee	For comments and suggestions
Area Partnership Forum	For comments and suggestions
Staff Governance Committee	For comments and suggestions, and final sign off prior to adoption and publication

8. Communication Arrangements

An effective mechanism for consulting on and sharing this policy with employees, volunteers, members of the public and other stakeholders is provided through the Health, Safety and Wellbeing Committee, Area Partnership Forum and Staff Governance Committee.

Following final approval and publication, the requirements and application of this policy should be communicated through local team briefings as necessary.

To provide easy access for premises users, occupiers, staff and contractors, this policy will also be made available on the corporate website.

9. Non NHS Properties

Where staff or contractors are required to work in/on non-NHS Shetland owned properties, joint responsibility between NHS Shetland and the building owner applies. The specific working arrangements for this will be dealt with in the Asbestos Management Plan.

10. Monitoring Arrangements

The appointed Asbestos Manager shall monitor this Policy together with the Asbestos Management Plan to control the risk from exposure to asbestos.

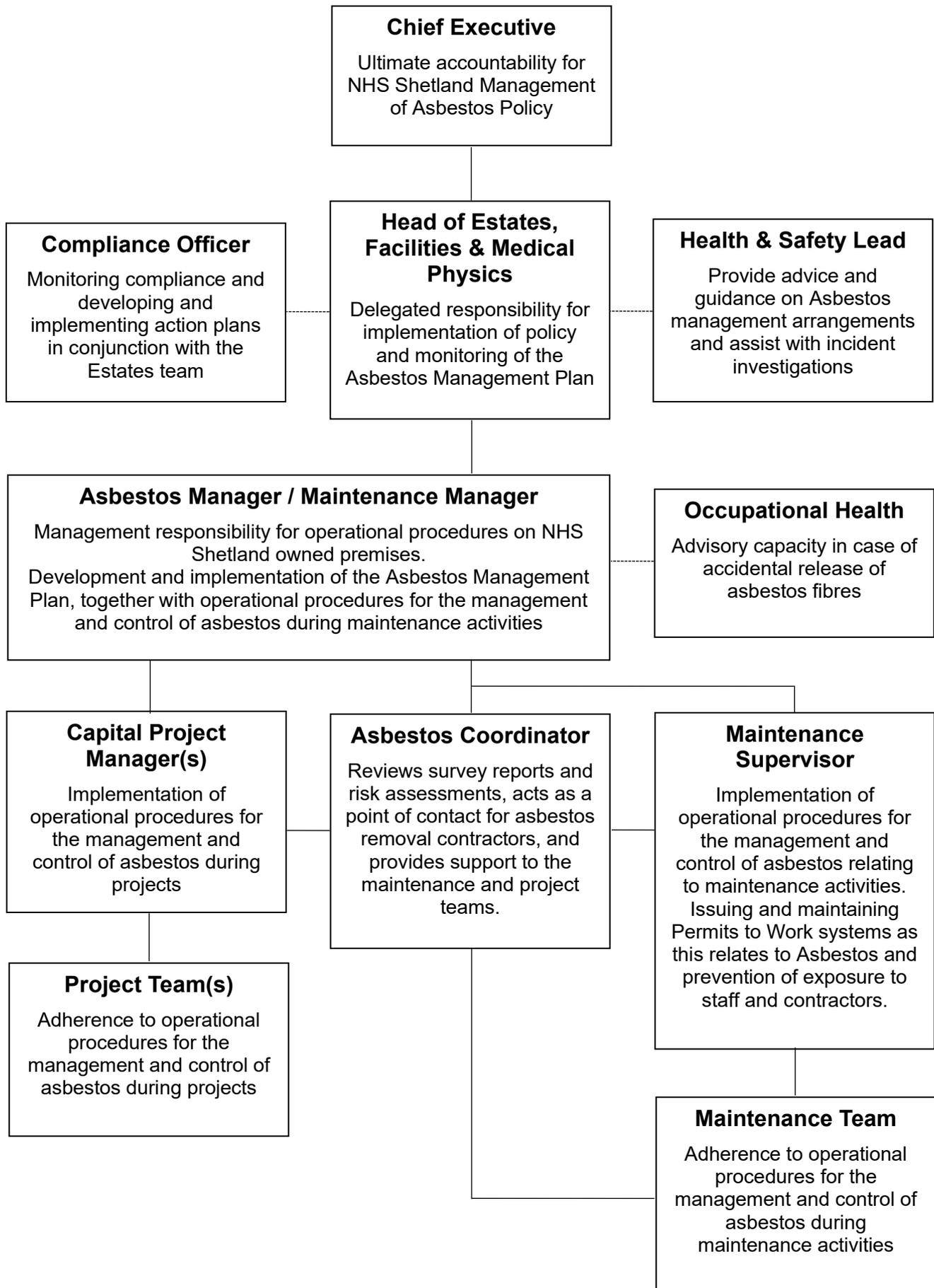
11. Review Arrangements

This policy shall be reviewed every 3 years, instigated by the Asbestos Manager. In addition, the policy shall be reviewed if there are changes to legislation, the structure of the organisation, personnel, or risk as a result of incident investigations.

12. Records Management

All records such as asbestos surveys, asbestos registers and asbestos management plans / risk assessments shall be retained for at least the life of the building.

Appendix 1- Organisational Structure for the Management and Control of Asbestos



Appendix 2 – Rapid Impact Checklist

An equality and diversity impact assessment tool:

Which groups of the population do you think will be affected by this proposal?*

Other groups:

- Minority ethnic people (incl. Gypsy/travellers, refugees & asylum seekers)
- Women and men
- People with mental health problems
- People in religious/faith groups
- Older people, children and young people
- People of low income
- Homeless people
- Disabled people
- People involved in criminal justice system
- Staff
- Lesbian, gay, bisexual and transgender

*the word proposal is used as shorthand for the policy, procedure, strategy or proposal that is being assessed

In the following sections, please consider what positive and negative impacts you think there may be and which specific groups will be affected by these impacts?

What impact will the proposal have on lifestyles?

For example, will the changes affect:

- Diet and nutrition
- Exercise and physical activity
- Substance use: tobacco, alcohol and drugs
- Risk taking behaviour
- Education and learning or skills

None

Will the proposal have any impact on the social environment?

Things that might be affected include:

- Social status
- Employment (paid or unpaid)
- Social/Family support
- Stress
- Income

No

<p>Will the proposal have any impact on the following?</p> <ul style="list-style-type: none"> • Discrimination? • Equality of opportunity? • Relations between groups? • Fairer Scotland Duty 	No
<p>Will the proposal have an impact on the physical environment?</p> <p>For example, will there be impacts on:</p> <ul style="list-style-type: none"> • Living conditions? • Working conditions? • Pollution or climate change? • Accidental injuries or public safety? • Transmission of infectious disease? 	No
<p>Will the proposal affect access to and experience of services?</p> <p>For example:</p> <ul style="list-style-type: none"> • Health care • Transport • Social services • Housing services • Education 	No

Impact Assessment Summary sheet

Positive Impacts (note the groups affected) N/A	Negative Impacts (Note the groups affected) N/A
Additional Information and Evidence Required N/A	
Recommendations None	
From the outcome of the RIC, have negative impacts been identified for race or other equality groups? Has a full EQIA process been recommended? If not, why not? No negative impacts identified from the RIC. A full EQIA has not been recommended due to the lack of impacts on any particular groups of the population.	

Signature(s) of Level One Impact Assessor(s):

Date:

Signature(s) of Level Two Impact Assessor(s):

Date: