



Defence
Infrastructure
Organisation

DIO POLICY INSTRUCTION

Subject: **MANAGEMENT OF ASBESTOS IN FIXED INFRASTRUCTURE**

Number: PI 02/15

Safety Environment and Engineering Sponsor:
Principal Safety Advisor

Date of issue: 11 May 2015

Contact if different from above Sponsor:

DIO CESO

Defence Infrastructure Organisation

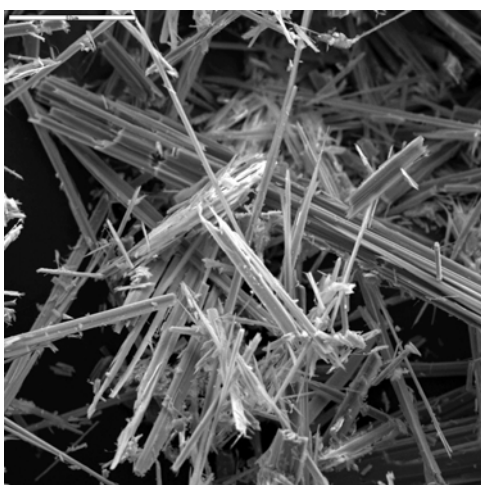
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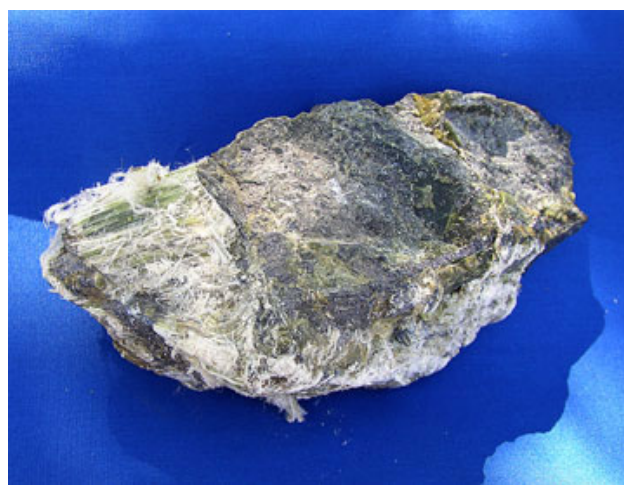
Who should read this: DIO Staff and Contractors; Public, Private Partnerships, Private Finance Initiatives Project Managers/Commercial Officers, Commanding Officers / Heads of Establishment (CO/HoEs) and representatives; and Chief Environment and Safety Officers (CESOs) or equivalent.

When it is due to expire: until updated or rescinded

Health and Safety



Anthophyllite at 504m
(grey-brown asbestos)



Chrysotile
(white asbestos)

Equality And Diversity Impact Assessment

This policy has been Equality and Diversity Impact Assessed in accordance with the Department's Equality and Diversity Impact Assessment Tool against:

Part 1 Assessment Only (no diversity impact found)

DOCUMENT AIM

1. This document details the management arrangements and the roles and responsibilities placed on Defence Infrastructure Organisation (DIO) and its contractors by the Control of Asbestos Regulations 2012 HSE Approved Code of Practice and Guidance L143¹ and MOD Policy² for the management of asbestos in fixed infrastructure³ managed by DIO. Requirements within are mandatory for all DIO Staff and Contractors.
2. It is not intended to provide a full explanation of the Control of Asbestos Regulations. The best source for that information is Health and Safety Executive (HSE) document L143. Further guidance on competence, quality assurance and surveys, including: survey planning, carrying out surveys, the survey report and the dutyholder's use of the survey information can be found in HSE document HSG264⁴. Both documents can be downloaded from the HSE website - www.hse.gov.uk.

Where there is a conflict between this Instruction and a Regulation or HSE Approved Code of Practice or Guidance the DIO Principal Safety Advisor is to be advised.

¹ L143 - Managing and Working with Asbestos, Control of Asbestos Regulations 2012, Approved Code of Practice and Guidance. This sets out legal duties and minimum standards for protecting employees from risks associated with exposure to asbestos. The ACOP and Guidance contained give practical advice on how to comply with the requirements.

² JSP 375 Management of Health and Safety in Defence, Part 2, Volume 1 Chapter 36 – Asbestos.

³ Fixed Infrastructure – the systems forming part of the permanent asset for which DIO is responsible for maintenance.

⁴ HSG264 - Asbestos: The Survey Guide. This is the lead reference document for people carrying out asbestos surveys and people with specific responsibilities for managing asbestos under the Control of Asbestos Regulations. It covers competence, quality assurance and surveys, including: survey planning, carrying out surveys, the survey report and the dutyholder's use of the survey information. HSG 264 provides specific guidance for surveyors and guidance for clients/dutyholders.

POLICY AND STATUTORY REQUIREMENTS

3. MOD Policy and guidance on asbestos is contained within JSP 375.
4. DIO Policy is that staff and its contractors comply with all applicable legislative requirements, HSE/Industry best practice and MOD mandated requirements both in the UK and overseas.
5. DIO Contractors and all their supply chain members shall comply with all relevant health and safety legislation, ACOP, other MOD mandated publications, MOD Joint Service Publications and Establishment health and safety policy; working in accordance with Industry Best Practice.
6. MOD has a statutory duty to manage the risks from asbestos in all non-domestic⁵ premises⁶. To discharge this duty requires establishments to have in place and implement a suitable establishment-wide Asbestos Management Plan (AMP) with associated documents and to take action as appropriate.

RISKS TO HEALTH

7. Asbestos is a naturally occurring, Category 1 human carcinogen formed from a group of silicate minerals that are highly fibrous. The three main types are: Crocidolite (“blue asbestos”); Amosite or Grunerite (“brown asbestos”) and Chrysotile (“white asbestos”). Exposure to all types can cause asbestos-related diseases. Large amounts of asbestos containing materials (ACMs) were used for a wide range of construction purposes in new and refurbished buildings until 1999 when all use of asbestos was banned. This extensive use means there are still many buildings within MOD which contain asbestos.
8. The presence of asbestos alone does not create a health concern, where ACMs are in good condition and unlikely to be disturbed they do not present a significant risk to health. However, where they are in poor condition - or disturbed or damaged by occupants or visiting workers - microscopic asbestos fibres are released into the air which, if inhaled, put people at risk of serious lung diseases, including cancer. Although long term ill-health or disease is unlikely to occur from a single exposure, this risk increases as a persons exposure increases – i.e. the greater the frequency, duration or concentration of exposure, the greater the likelihood and severity of ill health.

⁵ Barracks, messes, Single Living Accommodation (including Substitute Single Living Accommodation and hirings) and Service Family Accommodation are deemed by MOD to be “non-domestic”.

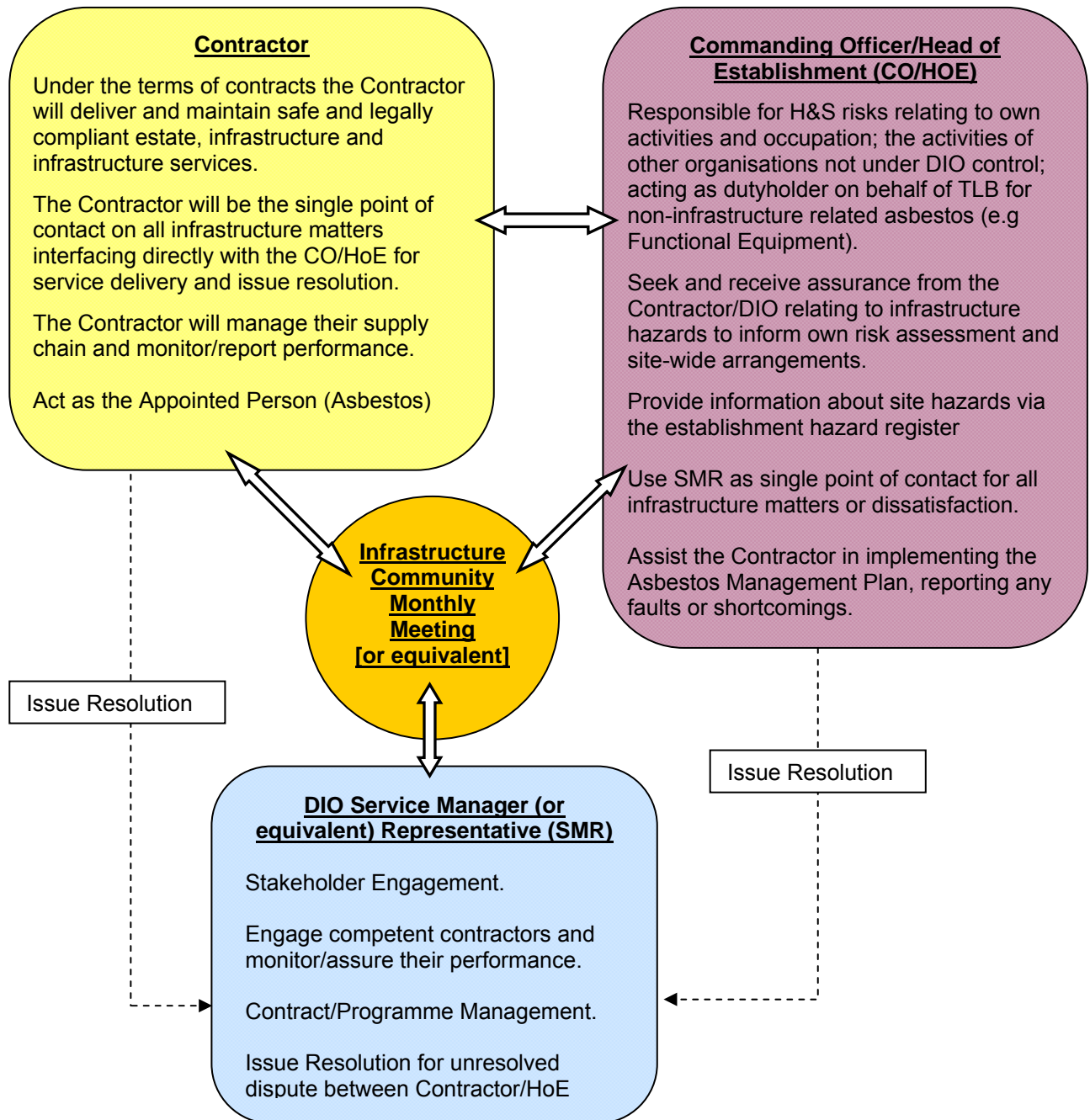
⁶ “Premises” includes vehicles, vessels, aircraft, installations on land and offshore, tents and moveable structures; although the duty to manage asbestos in these assets would normally be discharged by the HoE.

KEY STAKEHOLDERS AT ESTABLISHMENT LEVEL

9. DIO, as a Defence enabler and, where applicable, CDM⁷ Client is responsible for provision of statutory compliant infrastructure⁸ and has a significant lead role in discharging Asbestos dutyholder requirements. However, DIO cannot discharge this duty without input from Heads of Establishment and the Contractor as the task of managing asbestos on the Defence Estate requires input, sharing of responsibility and co-operation by all parties.

10. The diagram below illustrates the general inter-relationships for Health, Safety and Environmental Protection (HSEP) Management at Establishment level. For other contractual arrangements, refer to Annex A 'Differences in Implementation'.

11. For specific details of roles and responsibilities, refer to Role and Implementation section.



⁷ CDM – Construction (Design and Management) Regulations.

⁸ With the exception of 'retained areas' where another party retains control.

ROLES AND IMPLEMENTATION

12. There is a statutory duty on MOD and those it engages to manage the risks from asbestos, with L143 identifying dutyholders⁹ as those with obligations for maintenance or repair and those having control, including access. As such, the corporate dutyholder obligations within MOD are discharged by a number of parties.

Duties within the typical Service Delivery arena are as follows; see Annex A for contract specific or other stakeholder variations.

13. **DIO Service Manager** or equivalent¹⁰, has responsibility to ensure that competent contractors have been engaged (see Para 14.a). This can be a corporate appointment to deliver and maintain a safe and legally compliant estate. The Service Manager remains accountable for the following tasks which may be cascaded to the relevant DIO manager¹¹ e.g. Sub Regional Infrastructure Manager, Senior Infrastructure Manager, who need to ensure activities are effective in managing asbestos.

- a). Takes the lead in discharging the dutyholder role for Asbestos in fixed infrastructure¹², agreeing and co-signing the establishment Asbestos Management Plan.
- b). Puts systems in place via the assurance process to monitor and assure contractor performance and competence in managing asbestos.
- c). Provides assurance¹³ to CO/HoE that the Asbestos Management Plan is being implemented and controls remain effective.
- d). Is responsible for alerting the Contractor to any relevant new information to enable the Asbestos Management documentation to be updated e.g. discovery of asbestos in ground, availability of updated Land Quality Assessment reports, or other sources of information in relation to Asbestos in ground from Land Condition Files (LCFs).
- e). Facilitates issue resolution and contract/programme management in event of unresolved dispute between Contractor and CO/HoE.

14. **Contractor** is responsible for planning, implementing and delivering all aspects of asbestos management work to secure compliance. This includes producing plans and delivering control measures to manage asbestos containing materials. Specific to asbestos, the Contractor:

- a). Is appointed by DIO to act as Appointed Person¹⁴ (Asbestos) taking day-to-day responsibility for managing asbestos by identifying and controlling associated risks in all MOD controlled fixed infrastructure¹⁵.
- b). Takes all reasonable steps to determine the location of materials likely to contain asbestos and check their condition; this is to be done by completing systematic asbestos surveys in accordance with HSG264 and maintaining a written (or appropriate electronic system) record i.e. an Asbestos Register (AR) of the location and condition of known or presumed ACMs. The record is to be kept up to date, to include a site plan indicating the

⁹ In this document, the term dutyholder is taken in the context of the Asbestos Regulations and this is **not** to be confused with appointments made under the MOD Duty Holder construct (JSP 815, Part 2, Leaflet 2).

¹⁰ DIO Service Manager is a term used within DIO NGEC/NTEP arrangements as the post with overall contractual accountability. For varying methods of delivery with DIO involvement, refer to Annex A - 'Differences in Implementation'.

¹¹ DIO Service Manager cascades duties to the relevant Delivery Manager (post terminology may differ from that used e.g. Sub Regional Infrastructure Manager and Senior Infrastructure Manager or equivalents).

¹² Fixed Infrastructure – the systems forming part of the permanent asset.

¹³ Refer to Annex C - Aide Memoire to Support Awareness of DIO Assurance Checks providing assurance to the CO/HoE.

¹⁴ As described in HSE publication HSG 264.

¹⁵ With the exception of 'retained areas' where another party retains control.

location of all asbestos and where asbestos products have been identified and removed with associated clearance/disposal records.

c). Prepares, maintains and reviews an Establishment Asbestos Management Plan (AMP) for tri-party¹⁶ ownership where appropriate; co-signing and maintaining it on DIO's behalf and in conjunction with the CO/HoE. The plan is to be put into effect to ensure that active steps are taken to check, manage, inspect on a risk-basis and formally record the following actions:

- All known and presumed ACMs are kept in a good state of repair.
- Any ACM/presumed ACM is repaired or removed on the basis on the risk associated with its location, condition and asset use.
- Information on the location and condition of the ACM is provided to anyone potentially at risk¹⁷.

d). Appoints and monitors competent persons / sub-contractors to manage and undertake practical application of the Asbestos Management Plan and asbestos management activities under their control.

e). Co-operates and shares information (including the AMP and register) in accordance with site procedures using the CO/HoE 4C system or equivalent site mandated arrangements¹⁸.

f). Produces structured and coherent submissions to DIO for allocation of resources and funding for programmes and projects to deal with asbestos (e.g. minor new works and life cycle replacements).

g). Provides support to unusual or emergency events e.g. provision of clearance/reassurance analysis and certification for reoccupation.

15. Commanding Officer/Head of Establishment (CO/HoE). The CO/HoE¹⁹ is responsible for site wide arrangements including co-ordination and co-operation elements of the MOD 4C system. This includes responsibility for the relevant employer obligations where non-infrastructure Asbestos forms part of site activities e.g. asbestos incorporated in equipment stored or used at site. Specific to asbestos, the CO/HoE:

a). Takes the lead in discharging dutyholder responsibility for non-infrastructure related asbestos (e.g Functional Equipment).

b). As MOD controller of premises, co-signs the Asbestos Management Plan in respect to risks generated by, and requirements placed on, the user community and ensure these are communicated to, and complied with, by own and all lodging TLB/TFA units.

c). Co-ordinates and informs the Contractor of building occupancy and use, including planned / arising changes, so that asbestos risks due to user activities can be evaluated and managed.

d). Notifies, co-operates and co-ordinates with the Contractor and DIO of any user aspects for incorporation into the establishment AMP and any asbestos related issues or other concerns raised by the user community; including discovery of asbestos in the ground.

¹⁶ DIO, Contractor and Head of Establishment.

¹⁷ Occupants of Service Families Accommodation are exempt from this requirement and will only be provided specific results upon request.

¹⁸ JSP 375 Management of Health and Safety in Defence, Part 2, Volume 1, Chapter 34 – 4C System - Management of Visiting Workers and Contractors.

¹⁹ Note the HoE role may be discharged by a DIO employee in the case of sites in service housing, accommodation, sites in disposal or the training estate where this role would rest with the Principal Training Safety Officer or equivalent.

e). Prohibits activities which may damage or result in the release of asbestos fibres into the atmosphere.

f). Puts arrangements in place to ensure that the relevant extracts of the Asbestos Register and AMP are communicated to all defence personnel, visitors, or emergency services that through their work activity may disturb known or suspected ACMs. Maintains sufficient and up-to-date information to enable accident and emergency services immediate access to relevant detail on arrival. This is to include a current copy of relevant asbestos documentation (specifically the Asbestos Register) and a site plan indicating all buildings that contain asbestos.

g). Takes the lead in coordinating other events; including activities involving Self Help Projects organised by the Establishment, DII, BT, Charity Events and Aquatrine/SLAM activities etc.

16. To avoid duplication and potential for gaps in asbestos management, a single Asbestos Management Plan (AMP) is to be implemented at Establishments, incorporating all relevant Asbestos aspects and responsibilities. The AMP should signpost to other AMPs e.g. Service Delivery Accommodation where controlled by another party.

17. In order to be assured that the responsibility is being adequately discharged, the DIO dutyholder requires evidence of monitoring, activities and data to demonstrate the discharge of DIO responsibility using the product of EM/02 checks and, where necessary, reach back to the DIO SME. Where appointments or nominations are made to assist in managing asbestos the DIO dutyholder needs to be assured of the nominees or appointees continuing suitability and competence.

18. The evidence to assist in assuring the adequate discharge of duties is to be provided by a combination of information provided by the Contractor's Appointed Person (Asbestos); supported by local scrutiny of performance conducted on behalf of the DIO Service Manager with regional and site/establishment level checks. DIO Total Facilities Management Assurance Teams provide a compliance/assurance programme using PG EM 02 and are supported by the DIO Health and Safety Team as appropriate who can conduct targeted and more specific checks.

WORKING WITH ASBESTOS

19. Notifications of licensable and non-licensable work are to take place in accordance with L143; however, the DIO approach to work with asbestos is as follows.

a. All DIO managed activities involving Notifiable Non-Licensed Work (NNLW) on asbestos is to be carried out by licensed asbestos contractors.

b. DIO staff are prohibited from any work with asbestos, this includes work that gives rise to sporadic and low intensity exposure. In exceptional circumstances, DIO staff may be permitted to complete specified asbestos tasks although this will be agreed by the Delivery area at B1 level, on a case-by-case basis and with an exemption from the DIO Principal Safety Advisor. In these exceptional cases, MOD Policy and guidance for Line Managers is contained within JSP 375²⁰; staff are to be subject to appropriate health surveillance in accordance with JSP 375²¹. See Paragraph 22 (below) for retention of records.

²⁰ JSP 375 Management of Health and Safety in Defence , Part 2, Volume 1 Chapter 36 - Asbestos.

²¹ JSP 375 Management of Health and Safety in Defence , Part 2, Volume 1 Chapter 14 - Health Surveillance and Monitoring.

INFORMATION, INSTRUCTION, TRAINING AND COMPETENCE

20. Anyone or any organisation required to carry out work in connection with asbestos must know what they have to do and be able to do it safely. Dutyholders and employers are responsible for ensuring that adequate information, instruction and training is given to their employees:

- a. whose work or occupation could foreseeably expose them to asbestos; and,
- b. who carry out work in connection with the employer's duty to manage asbestos.

21. Annex D sets out the DIO approach to training, awareness and competence with minimum requirements for the various roles in managing asbestos for the MOD estate.

RETENTION OF RECORDS

22. MOD Policy²² requires the recording and retention of details relating to Health Surveillance, Health Records where exposure may lead to a disease many years later. The MOD requirements for retention²³ are greater than the retention period in L143²⁴ and the Contractor is required to comply with the terms and conditions of contract retaining records for the duration and making them available to the authority as required. The Contractor should retain relevant records as appropriate for its own staff to ensure compliance with any legislative requirement and to support any future claim.

23. All infrastructure asbestos records are to be retained by MOD for any future claim. Documents are to be stored and remain accessible to the DIO dutyholder. Where building or land is being transferred or disposed of there is a requirement to hand over the asbestos register to the new owner, but a copy of all relevant asbestos documentation (asbestos register, management plan, surveys, analysis, air tests, incidents, asbestos remediation etc) must be retained by DIO in an easily accessible format in a central electronic filing system. The availability and suitability of such records will be subject to both contractor and DIO H&S audits.

24. Records relating to asbestos awareness information, instruction and specific training are to be retained for all staff who work with asbestos, this is to be held by the relevant employer for their own staff.

REPORTING

25. Asbestos incidents are to be reported to the DIO Incident Notification Cell. Where an activity (including those performed by a contractor) involving asbestos results in accident, incident, dangerous occurrence or near miss and could expose or potentially expose DIO to liability, then this shall also be reported to the DIO Service Manager or equivalent using the established process, copied to DIO Incident Notification cell [DIO-CESO MULTIUSER].

ASBESTOS IN THE GROUND

26. All Asbestos in ground relates to fibres in the ground that may be released by erosion, significant weather events, construction/demolition or grounds maintenance works. Known occurrences of asbestos in the ground should be recorded in the establishment hazard register and the asbestos register. Where excavation work is planned, the potential for asbestos in the ground should be considered²⁵. Where asbestos in ground is foreseeable then additional skills, experience and competencies may be required in order to adequately investigate and assess the potential risks.

²² JSP 375 Management of Health and Safety in Defence, Part 2, Volume 1 Chapter 39 – Retention of Records.

²³ Typically requiring records to be retained for 60 years from date of last entry/exposure or 100 years from date of birth.

²⁴ Typically requiring records to be kept available in a safe place and in a suitable form for at least 40 years from the date of the last entry made in it.

²⁵ CIRIA: Asbestos in soil and made ground: a guide to understanding and managing risks (C733)

Reference in this regard can be made to DIO Safety Environment and Engineering – Environment and Planning Service.

Further advice and assistance on matters pertaining to this Policy Instruction can be obtained from the document sponsor or point of contact detailed below. It is the responsibility of the user to ascertain if they have the most up to date version of the document. Advice on asbestos related matters can be obtained from Defence Infrastructure Organisation through local Health and Safety Advisors or direct from the policy sponsor:

**DIO Principal Safety Advisor
Defence Infrastructure Organisation
Kingston Road
Sutton Coldfield
West Midlands B75 7RL**

DIFFERENCES IN IMPLEMENTATION

- 1. Projects.** For Major and Capital Works Projects, DIO Programmes and Projects Delivery (PPD) operate Regional and National frameworks to deliver projects across a wide range of asset types. There will be a liaison interface with the Service Delivery teams for sharing of relevant information in order to ensure suitability of existing information for scope of intended works. Further Intrusive asbestos survey work may be needed to plan for project safety and achieve compliance.
- 2. Disposals.** For Sites-in-Disposal or Acquisitions, DIO Service Delivery will discharge the (nominal) CO/HoE role. Where sites are passed to the Land sales Delivery Partner to manage disposal, they are to make their own assessment of asbestos hazards and risks.
- 3. United States Forces.** On MOD sites utilised by USVF, asbestos is managed as an environmental issue not health and safety. The Environmental Management branch of Civil Engineering, US Air Force in Europe Command level - as USVF executive agent for such issues in the UK - have come to agreement with the DIO US Forces division (DIO USF), that USVF assume the *dutyholder's responsibilities* in respect of UK Asbestos legislation. However, USVF do this not out of compliance with UK legislation, but out of compliance with their own asbestos management policy. This policy is published in the US Department of Defence documents, Final Governing Standards - United Kingdom - Ch 15 (FGS) and AFI 32-1052. The FGS-UK is applicable to all branches of the US Department of Defence operating in the UK. USVF policy covers similar requirements to produce an establishment management plan to identify, risk assess, manage and communicate information about asbestos in facilities, and to mitigate occupational exposure. In line with UK legislation, DIO USF co-operates closely with USVF as 'dutyholder' in asbestos management matters, and ensures MOD contractors do likewise and comply fully with UK legislation. Assurance is provided in conjunction with Technical Guidance 05 – DIO USF asbestos survey procedures.
- 4. PFI.** For DIO managed Private Finance Initiatives (PFI) the PFI Contractor is accountable for managing disclosed Asbestos and is the Asbestos Duty Holder in respect of maintenance and repair of the non-domestic premises, where it falls within its remit. Undisclosed asbestos normally falls to the PFI Contractor to manage (at the Authority's expense), but this may vary by Contract/Establishment. The PFI Contractor should maintain a Business Asbestos Management Plan, an Asbestos Register and supporting Property Action Plans. Assurance that systems are in place and functioning should be reported by the PFI Contractor, normally through the DIO PFI Representative.
- 5. RFCA.** For the Reserve Forces and Cadets Association (RFCA), where the RFCA owns the establishment, the RFCA Head of Estates has accountability for managing asbestos, with the duties cascaded down to the RFCA Works Officer to oversee and maintain compliance. The DIO Volunteer Estate team's support to the RFCA is limited to advising on suitability of arrangements. Where the RFCA is a lodger unit on a MOD establishment, asbestos will be managed in accordance with the procedures relevant to the establishment and contractual arrangement; typically by the standard MOD tri-party arrangement involving DIO, the Contractor and the Head of Establishment; or PFI as appropriate.
- 6. Overseas.** For overseas locations, outside of UK territorial waters, UK licensed contractors may not be available. In order to avoid excessive costs involved with engaging contractors from the UK, a suitably competent local contractor may be engaged to carry out the works. To be deemed competent, a contractor must be able to demonstrate the skills and experience as laid down in the relevant Host Nation standards and to the UK HSE ACOP, a record of the assessment should be retained. In such cases, the party engaging those carrying out the work is responsible for assessing

their competence and monitoring their performance. Support is available from the DIO Health and Safety team.

7. **Accommodation.** For Service Delivery Accommodation (SDA), Service Family Accommodation falls outwith the Establishment CO/HoE control and responsibility. Most are tri-service and the CO/HoE is the 1* in charge of SDA. For this reason SDA have traditionally had their own Asbestos Management Plan which the 1* signs, this may now be countersigned by the Service Manager. This Plan sits above the Contractors AMP and details SDA Policy. As a result SDA do not co-sign the numerous Establishment Asbestos Management Plans, even for Service Family Accommodation behind the wire and the assets are maintained using an electronic SDA Asbestos Register and not on the Establishment Asbestos Registers. Misappropriated housing that is not under DIO SDA control will need to be managed by the body in control of maintenance.

8. **Tenants.** Third parties occupying non-domestic premises under full maintenance and repair arrangements for non-MOD undertakings shall ensure full compliance with the Regulations, including:

- a. Operating their own arrangements including AMP, AR and visiting worker induction programme.
- b. Where relevant, cooperating with the CO/HoE as necessary to ensure site-wide arrangements are suitable and sufficient, including population and revision of the relevant parts of the site AMP to ensure all parties are aware of current risks. A key part of the CO/HoE engagement process at establishment/unit level is the Infrastructure Community Monthly Meeting (ICMM); this is the primary mechanism for DIO and User engagement and provides a regular forum to share asbestos information/updates.

9. **BFG.** British Forces Germany (BFG) are required to comply with the Supplementary Agreement (SA) to the Status of Force Agreement (SOFA) that clearly states all visiting forces are to comply with German Law and this includes compliance with German Health and Safety Law in respect to activities undertaken on their land (Article 53.1 SA). This general obligation is subject to certain exemptions but these are rarely applied (e.g. where MOD personnel work in strict isolation).

a. This obligation is underpinned in the Health & Safety and Environmental Protection for Defence Policy Statement issued by the Secretary of State for Defence which states:

“Overseas, we apply our UK arrangements where reasonably practicable and, in addition, respond to host nations’ relevant HS&EP expectations.”

b. BFG therefore, is to comply with German Health and Safety standards (in line with the SA) and only to apply a different standard (i.e. UK) where it is reasonably practicable to do so. Reference to “Reasonably Practicable” in the SofS statement means that where there is a measurable reduction of risk in the level of safety this must be proportional to the difficulty and cost of taking the measure.

c. Despite BFG’s primary obligation to comply with German Health & Safety Standards, it is important to ensure that safety measures taken in BFG which could affect our military, civilian and dependent members of the community are not inferior in principle to those which would be applied in the UK, so that they are provided, in so far as is reasonably practicable, with the same degree of HS&EP support, training and protection that would be afforded to them in the UK.

d. During the operation of this Asbestos Management Plan (AMP) there may be variations identified where Host Nation legislation and/or guidance (in relation to inspection and maintenance frequencies of ACMs or equipment) may fall short in meeting UK/MOD Standards. In these cases a judgement needs to be made by the DIO SDO(E) HQ – SME

Focal Point (Asbestos), where reasonably practicable, to include additional UK/MOD Standards or guidance if/when considered appropriate.

e. Host Nation compliance checks are carried out by the German regulatory authorities (KFB) and/or the Accident Insurance Carriers (UVB). Both have statutory powers to take enforcement action in the event of breaches of German health & safety law. BFG are required to ensure full compliance with the HN regulators including any remedial actions recommended.

AIDE MEMOIRE TO SUPPORT AWARENESS OF DIO ASSURANCE CHECKS

The DIO Service Manager or equivalent (and any DIO staff involved in activities to manage asbestos on the dutyholder's behalf) need to be aware of a number of points to support activities to enable them to assure any interested party e.g. CO/HoE.

The following list is taken from HSG264 - Asbestos: The Survey Guide; providing an aide memoire to specific guidance for clients/dutyholders. The publication contains full details and signposts the relevant details within green summary boxes as follows:

- Box 1: The purpose of an asbestos survey.
- Box 3: What the client/dutyholder should do to check the competency of the surveyor.
- Box 4: Areas to be inspected as part of a management survey.
- Box 6: Information the client/dutyholder should expect from the surveyor.
- Box 9: Information required for a management survey.
- Box 10: Information required for a refurbishment or demolition survey.
- Box 11: What the client/dutyholder should do to check the accuracy of the survey report.

On USVF sites, assurance checks are carried out under the Base Facility Management Agreement, Tasks 237.2, 237.4, 549 and 550.

DIO Service Delivery uses the PG EM 02 document to provide assurance against delivery tasks and activities. This can include sampling activities involving asbestos and these specific tasks can be supported by the DIO Health and Safety team, where there is a need for specialist assistance.

Assurance checks are also needed for storage, carriage, Hazardous Waste consignment and disposal; including the competence of Asbestos removal companies; carriage of Asbestos Waste on public roads; disposal routes and duty of care for Hazardous Waste Consignments through to Consignee's return to Consignor.

**Annex C
To DIO Policy Instruction
02/14**

The Table below sets out the minimum training requirements for the various roles in managing asbestos for DIO staff.

Ser	Role	Minimum Requirements	Comments
1	DIO Service Manager	Asbestos Awareness ^{26*} refreshed annually	'Category A' Asbestos or similar Awareness Training - appropriate for those people who do not work on asbestos containing materials however require training to enable them to identify asbestos containing materials. Supplemented by awareness of this Policy Instruction the site Asbestos Management Plan and Asbestos Register
2	CO/HoE		
3	4C Dutyholder and Area Custodian		
4	Anyone with asbestos management role		
5	Anyone carrying out work that may disturb the building fabric		
6	Anyone occupying a building containing ACM	Awareness of site documents (location and content) ²⁷	Site Asbestos Management Plan and Asbestos Register
7	Appointed Person (asbestos) and deputy	BOHS P405 or equivalent	Supplemented by awareness of this Policy Instruction and required to develop a working knowledge of site Asbestos Management Plan and Asbestos Register within their area of responsibility
8	DIO H&S Advisors		
9	Asbestos surveyors	UKAS Accreditation or appropriate qualification	As specified in HSG 264

Note: where there is a risk of exposure to asbestos, the training requirements for carrying out work on asbestos are additional to this and are set out in the Regulations²⁸.

²⁶ e.g. In-house presentation, DLP module V398N or other 'Category A' Asbestos Awareness training in accordance with the requirements of L143. Asbestos Awareness training is not intended to prepare people to work with asbestos; it is intended to identify where work may disturb ACMs so they can avoid it.

²⁷ For SFA there is no requirement for occupants to be made aware of Asbestos Register details, unless there is a risk of exposure.

²⁸ CAR 2012.

SAMPLE LETTER - APPOINTED PERSON ASBESTOS

Dear.....

ASBESTOS APPOINTED PERSON

1. As laid down in HSE publication HSG 264 - Asbestos: The Survey Guide, I hereby formally appoint *[organisation]* to act as Appointed Person (Asbestos), for the management of the Asbestos risk for those assets for which the *[contract]* is responsible.
2. Please confirm your acceptance in writing and advise the names and contact details of those persons who will discharge this role on your behalf and the specific establishments/areas for which they will be responsible.

Yours sincerely

DIO Service Manager