

Appendix 02/22 - Non-Asbestos Risk

**Minutes of the meeting of the Asbestos Network Licensing Working Group (LWG), 6 January 2022
Composition of LWG: HSE, ACAD, ARCA, FDEM, NASC, NFDC**

Appendices are attached to Licensing Working Group minutes when the nature and extent of discussions (or the complexity of the subject) warrants further explanation and clarification. The following is a summary of the discussions and conclusions on the above topic.

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There has been some question over the suitability of site-specific risk assessments. This guidance has been produced to aid licensed asbestos removal contractors in producing suitable and sufficient risk assessments that address the significant risks identified on asbestos removal work sites.

Introduction

Risk management is about taking practical steps to protect people from real harm and suffering - not bureaucratic back covering. The ultimate aim is to demonstrate that each job has been properly assessed and a safe system of work can be planned and executed as a result. Generic, elongated risk assessments do not provide confidence that safe work practices are being designed.

The risk assessment process should focus on reducing significant risks – both those which arise more often, and those with serious consequences. It is not about creating a totally risk-free society and generating useless paperwork mountains.

Taking a sensible approach to risk management is about, amongst other things, ensuring that those who create risks manage them responsibly. Where enforcing authorities identify that significant risks are not being managed responsibly, they are likely to take robust action.

Everyday Life Risks

You do not need to include risks from everyday life unless your work activities increase the risk. Getting in and out of a van is a risk from everyday life, rarely will your work activities increase the risk associated with this activity. Therefore, including risks such as these for every job is unnecessary and defeats the object of focusing on, and dealing with, the significant risks.

The development of overly long risk assessments to try and create a totally risk-free society is not necessary. These could draw attention away from the significant risks on site, thereby increasing risk. It is important for clients and others who might review a RA/PoW to bear this in mind and to not make unnecessary demands on the licensed asbestos removal contractor (LARC), creating a layer of 'blue tape' that HSE is actively discouraging.

Standard Operating, and Site-Specific, Risk Assessments

Some hazards, risks and relevant controls may be common to much of the work licensed contractors do. HSE guidance acknowledges that a **general risk assessment** of these can be useful. In practice, such a general risk assessment would have controls reflected in standard procedures and policies, there is no requirement to replicate SOP control content within a site-specific RA/PoW. Some examples are shown below:

Manual handling	Use lockable wheelie bin to transfer bagged waste to lockable skip
Slips and trips	Work areas kept clean and tidy, loose or trailing cables to be tied down
Work at height	Ensure only company issue step ladder is used for erection of enclosure
Biological/Chemical	Wear PPE at all times and follow adequate hygiene measures to avoid contracting Leptospirosis (Weils Disease)
Members of the public/other workers	Erect security fencing around asbestos area to prevent access

However, it is important to remember that if your work activities increase the risk to a significant level, then these should be addressed in your **site-specific risk assessment**. In addition, if site conditions mean your general risk assessment is not valid, then this should also be addressed within your site-specific risk assessment. The significant findings of the risk assessment need to be recorded: a simple statement as to what the risk is and what control measures are required to reduce the risk to an acceptable level and as low as reasonably practicable is **usually all** that is required.

Some site-specific examples are shown below:

Manual handling	NPU to be raised to top of scaffold using hoist fitted by scaffolding contractor
	Use sack barrows provided to move water containers to specified drainage point
Slips and trips	No lighting to basement boiler steps. Temporary lighting required
Work at height	Mobile tower required to access ACM for removal. PASMA trained operatives to erect, with Hold Point in PoW and checked by supervisor to ensure this is correctly built prior to removal activity
Isolation/purging	Gas pipe running across ceiling to be isolated and purged by Gas Safe engineer on day 1 of project; electrical supply to be isolated by (named) contractor prior to work starting. Hold points require certification by engineers within PoW, with supervisor signing to confirm sight of both
Biological/Chemical	Works are adjacent to live plant processing corrosive acid. Chemical protective coveralls, gloves and eye protection to be worn at all times during set up of barriers to facilitate subsequent enclosure working in standard enclosure PPE
Hand arm vibration	Floor slab requires breaking through to access AIB shuttering. Manual breaker will lead to excessive trigger time, so vehicle mounted breaker to be used
Members of the public/other workers	Building occupants briefed by employer on changes to their emergency exit route caused by enclosure blocking corridor. Waste runs to be made at set times and notified to residents, eg midday and 1630; supervisor to walk ahead of operatives
Confined space	Purging air to be introduced to facilitate works with trained site team, escape set provision and continuous gas monitoring in place throughout CS working

The difference between hazards controlled by a general RA with SOP-based controls and those that are site specific can vary from one LARC to another so cannot be definitively categorised. These can vary depending upon a LARC's typical area of work (eg domestic AIB boxing compared to high level lagging on a petrochemical site). This also means that site-specific controls, when encountered frequently or repetitively, can evolve into an SOP-based control. The actual hazard should always be detailed within a site-specific RA but it is acceptable for the control measures to reference the relevant SOP section. An obvious example is asbestos, where the entire content of a SOP will, in some way, contribute towards controlling this hazard.

Hierarchy Of Control

Risks should be reduced to the lowest reasonably practicable level by taking preventative measures, in order of priority. This is what is meant by a **hierarchy of control**. The list below sets out the order to follow when planning to reduce risks you have identified in your workplace. The headings should be considered in the order shown, do not simply jump to the easiest control measure to implement. This is taken from:

<https://www.hse.gov.uk/construction/lwit/assets/downloads/hierarchy-risk-controls.pdf>

1. Elimination - Redesign the job or substitute a substance so that the hazard is removed or eliminated.
2. Substitution - Replace the material or process with a less hazardous one.
3. Engineering controls - for example use work equipment or other measures to prevent falls where you cannot avoid working at height, install or use additional machinery to control risks from dust or fume or separate the hazard from operators by methods such as enclosing or guarding dangerous items of machinery/equipment. Give priority to measures which protect collectively over individual measures.
4. Administrative Controls - These are all about identifying and implementing the procedures you need to work safely. For example: reducing the time workers are exposed to hazards (eg by job rotation); prohibiting use of mobile phones in hazardous areas; increasing safety signage; and performing risk assessments.
5. Personal protective clothes and equipment - Only after all the previous measures have been tried and found ineffective in controlling risks to a reasonably practicable level, must personal protective equipment (PPE) be used. For example, where you cannot eliminate the risk of a fall, use work equipment or other measures to minimise the distance and consequences of a fall (should one occur). If chosen, PPE should be selected and fitted by the person who uses it. Workers must be trained in the function and limitation of each item of PPE.

Some examples of the application of the hierarchy of control to common asbestos removal hazards can be found in appendix 1.

Interim Site Visit & Dynamic Risk Assessment

Changes to site conditions may mean control measures, both site-specific and general, are no longer appropriate or additional hazards are now present which have not been subject to consideration in the original risk assessment / planning process. Given the potential for changing conditions between an initial site visit and a start on site, an interim site visit should be undertaken where reasonably practicable towards the end of the 14-day notification period to check for any changes.

A competent, experienced supervisor should also carry out their own risk assessment daily to check that site-specific risk assessments and PoW are still valid and sensible, ie nothing has changed since the risk assessment was compiled/reviewed which will now make it invalid and that no new hazards have appeared. This is known as a dynamic risk assessment, or a point of work risk assessment; care should be taken when abbreviating the latter to avoid any confusion with Plan of Work/Risk Assessment (PoWRA). Where new hazards have appeared, they will need to be properly assessed which is likely to warrant liaison with the contracts manager and potential amendment to the PoW.

Quantitative Risk Assessments

Risk ratings and probability calculations, also known as quantitative risk assessments, are not needed. They are mainly used as a guide to prioritise the implementation of control measures but not usually relevant for licensed work.

Further information on managing risks and risk assessment at work can be found at:

<https://www.hse.gov.uk/simple-health-safety/risk/index.htm>

Asbestos Removal - Common Hazards - Hierarchy Of Control

The following provides some examples of how this hierarchy can be applied in practice for some common hazards associated with licensed asbestos removal work. The table below sets out the order to follow when planning to reduce the risks you have identified in your workplace, it is not necessary to implement every measure, these are to provide examples of what could be done. For example, in the case of a fully boarded and guarded scaffold, workers would not be expected to wear personal fall-arrest equipment.

Hierarchy of control	Asbestos	Manual handling	Electrical	Working at Height
Elimination	Change scope of works so asbestos will not be disturbed	NPU positioned at ground level rather than raised on to scaffold	Isolation of power	Use extendable poles to support spraying of encapsulant onto external AC wall at high level
Substitution	Wrap and cut of redundant lagged pipework rather than removal of lagging from pipework	NPU raised onto scaffold using hoist rather than scaffold pulley/gin wheel	110 not 240 Volt	Purpose-built scaffold with adequate clearance beneath ACM to facilitate removal of AIB soffits
Engineering controls	Enclosure, negative pressure, controlled wetting, directly connected DCU	Sack barrow for the moving of transformers. Lockable wheelie bin for the transfer of waste bags from the enclosure to the skip	Locked off	Rope access trained operatives used to access ACM to be encapsulated
Administrative controls	Removal of whole/intact ACM following SOP and PoW	Manual handling training delivered to all workers. Supervision to ensure mechanical aids are used properly and PPE is being worn	Hold point in PoW requires isolation certificate to proceed	WAH training, PASMA training, scaffold hold point within PoW
Personal protective clothes and equipment	Type 5/6 cat 3 coveralls and full-face powered respirator	Gloves and safety boots required at all times	N/A	Fall arrest system with high level anchor