Female Analyst Working Group

Risk Assessment

To ensure a safe, respectful, and compliant working environment, the Female Analysts Working Group have developed a suite of practical documents that provide essential guidance on workplace behaviours, risk assessment, and safety procedures within the asbestos analytical industry.

The **Risk Assessment** document provides a structured approach to identifying and mitigating risks on-site. The **Supplementary Guidance on Decontamination Requirements for Analysts' undertaking 4-Stage Clearance** outlines best practices for both decontamination and personal safety protocols. Complementing these technical guidelines, the **Workplace Behaviours** document sets expectations for professional conduct, addressing concerns such as bullying, harassment, and discrimination.

To reinforce our commitment to maintaining a positive work culture, we also introduce a **Respect Charter**, which all organisations are encouraged to sign, demonstrating their pledge to uphold these standards. Together, these documents create a comprehensive framework to protect both physical and mental well-being in the workplace.

Introduction

The Control of Asbestos Regulations (CAR) 2012 requires employers to complete a written risk assessment for all work with asbestos. For the four-stage clearance (4SC), a risk assessment should be completed by the employer prior to analytical staff attending site. The assessment should be site and job specific and will therefore require an advance copy of the licenced asbestos removal contractor's (LARC's) plan of work (PoW).

Further dynamic risk assessments should be undertaken on site by the analyst, both outside and within the enclosure. The analyst should be trained to assess any changes to the work which may affect their health and safety, where site conditions may differ from those assessed in the step 1 risk assessment.

The risk assessment should include consideration of dutyholder/client arrangements for the site, which may include (but not limited to) the dutyholder's control of site staff, policies on behaviours, near miss reporting, communication and induction arrangements and general site-specific hazards which may not be readily apparent in the LARC's PoW (i.e., workplace transport).

Step 1 - Pre-site Risk Assessment (desk top assessment):

The step 1 desktop assessment should be completed by the analyst's employer, and consider the LARC's PoW, their own internal health and safety policies and any site-specific considerations and policies at the client / dutyholder site, including but not limited to:

1. Contractual arrangements; is the analyst employed by the client or LARC?
2. Who does the analyst report to on-site?
3. Locations of all site features of significance, i.e., fire muster points and alarms, first aid, site office, mobile laboratory location, good street lighting, within site compound.
4. Previous working relationship with LARC i.e., standard of site set up, scrupulously cleaned enclosure, polite well-mannered crew, several hours of further cleaning required.
5. Lone working risks: does the analyst have support on-site in decision making? Escalation procedure in place? Does the analyst and managers know their policy and procedure?
6. Fatigue management: night working, long shifts and driving to and from work and resting.
7. Site factors i.e., remote locations with limited signal (999 still operational in such locations), lone working, security of changing facilities (DCU), work at height within or accessing the enclosure, confined space works etc. Understanding the hazards on site to prepare the analyst and select the analyst with appropriate skills, experience, and training i.e. confined space, working at height.
8. Behavioural factors and risk of violence and aggression i.e., previous experience of intimidating or unwanted behaviour, known criminal convictions pertaining to violence / sexual violence, use of temporary staff.
9. Welfare facilities and staff site safety should be assessed in compliance with relevant legal provisions
10. Nature and size, and complexity of the work: e.g. bath panel, sprayed soffit over large area, all pipes, boilers etc in a small or large boiler house, crawl duct.
11. Approximate time to complete the job provided based on the PoW (considering any time pressures which may arise).
12. Factors affecting the possible/probable need for decontamination, i.e., type and extent of ACM, cleaning techniques, potential for breach of coveralls

The above will aid in the selection of the most appropriate person for the work and consideration of control measures for risks identified. The Analyst attending site should have all the above information available in writing, including the LARC's PoW.

Step 2 – Analyst's Dynamic Assessment: Outside of the Enclosure

The step 2 assessment should be completed by the analyst once they are on site. This will consider several factors, including but not limited to:

1. Site observations - site safety, security and housekeeping i.e., presence of obvious debris, trip hazards, enclosure integrity, observations of enclosure activities from the vision panel and or CCTV. Is there adequate access equipment for inspection of all surfaces?
2. Confirm exterior of the site follows PoW (including LARC's amendments) and the step 1 (desktop) risk assessment - ensure the relevant paperwork is in order, and the ABS5 allows sufficient time for the work, welfare is compliant /as per PoW.
3. Behaviour observations - any intimidating, coercive or aggressive behaviours, any job pressures (i.e., time pressures).
4. Personnel changes (differing from the PoW or step 1 risk assessment).
5. Upon receipt of the handover form following successful Stage 1 of 4SC – identify from the supervisor, any variations from PoW and any difficulties encountered. Handover sheet guidance https://www.coniac.org.uk/resources/asbestos-appendices
6. Decontamination requirements should be reassessed on site based upon observations, i.e., general cleanliness, difficulties identified by the LARC, cleaning methods, potential for breaches of coveralls in stage 2.

Step 3 - Analyst's Dynamic Assessment: Inside the Enclosure

If Stage 1 of 4SC is successful, the analyst can progress to stage 2.

The analyst's observations during the stage 2 inspection form part of the dynamic risk assessment process, to prevent them from being exposed to asbestos fibres from airborne or surface contamination.

Upon entering the enclosure, the analyst should begin their inspection with a broad sweep approach of the enclosure cleanliness. This approach aims to identify areas ("hot spots") which are common indicators of insufficient cleaning at an early stage. This acts as a procedural measure to safeguard the analyst, by preventing contamination, and excessive time in the enclosure where further cleaning is required by the LARC.

"Hot spot" areas include areas such as the back of pipes, above door frames, grooves in soffits, polythene covering potential contamination *(see Annex 1 photographs for guidance examples).*

Where cleaning is insufficient, photograph these areas and leave the enclosure. Do not proceed with any further inspection.

A “failed” 4SC certificate should be issued, and no further assessment inside the enclosure should occur until it has been re-cleaned and sufficiently vented, and another handover form is issued by the LARC supervisor once they are satisfied that the area is sufficiently clean and dry.

Relevant Legislation

The Control of Asbestos Regulations 2012
https://www.legislation.gov.uk/uksi/2012/632/contents

The Management of Health and Safety at Work Regulations 1999
https://www.legislation.gov.uk/uksi/1999/3242/contents

Construction Design Management (CDM) Regulations 2015
https://www.legislation.gov.uk/uksi/2015/51/contents

Workplace (Health, Safety and Welfare) Regulations 1992
https://www.legislation.gov.uk/uksi/1992/3004/contents

Useful Links

Handover Sheet Guidance
https://www.coniac.org.uk/resources/asbestos-appendices

HSE Managing Risks and Risk Assessment at Work
https://www.hse.gov.uk/simple-health-safety/risk/index.htm

Please send any feedback or comments about this document to the confidential email address: concerns@itsnotacceptable.co.uk

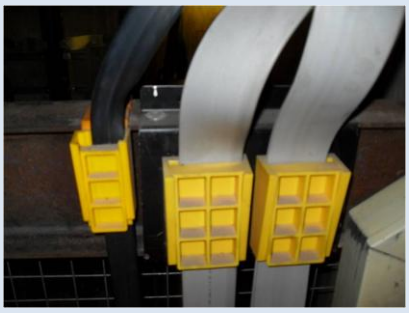
Annex 1 – Common "Hot Spot" Areas Indicative of Insufficient Cleaning

Areas within enclosure which can indicate insufficient cleaning and should be considered, where present, in this assessment, examples are as follows:

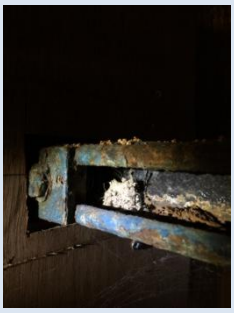
Timber batons where AIB has been attached

Beneath pipes especially where brackets or supports are present

To the rear of pipes especially adjacent to brackets or close to walls & ceilings



Intricate and difficult to clean surfaces where dust can collect



Within cavities and supporting brackets

Low level areas beneath plant and equipment

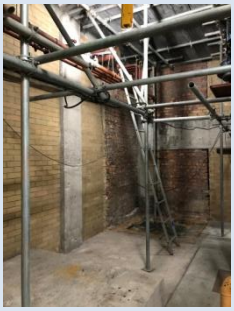
Equipment or tools used for cleaning

Blast media within cavities and edges adjacent to areas blasted

Within sumps and sunken or covered trenches

Ceiling supports or walls where ceilings were attached

Polythene sheeting including the airlock and baglock



Access equipment including scaffolding decks, poles, brackets, ladders etc.

Narrow gaps behind fixed equipment such as wall mounted radiators

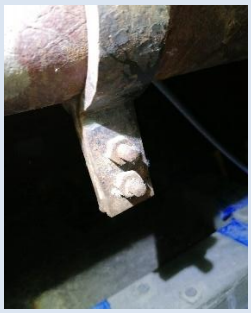
Scaffolding boards and gaps between them

Rough and porous materials where contamination can easily be missed

Difficult to clean surfaces like screw threaded bars

Small gaps between timber structures or finishing surfaces

Rough plant surfaces where insulation or cleaning materials can easily be snagged



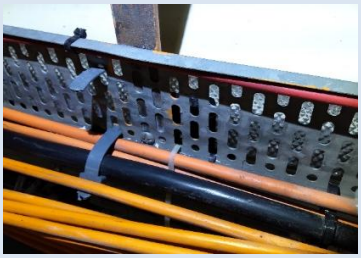
Difficult to clean surfaces like nuts and bolts

Any ledges where dust and debris can settle

Small openings in floors/ walls/ ceilings especially where services penetrate

Porous floor or wall surfaces where contamination can collect in the depressions

Conduits which have been unsealed or exposed to the removal environment



Cable trays, especially beneath unclipped cable bundles

Within fixed boxing which may have become contaminated during removal

Right into the edges and corners of all surfaces

Incomplete removal of encapsulants in difficult to reach alcoves / corners

		
Within intricate components of plant and equipment which are difficult to clean	*Oily or greasy surfaces where debris can become trapped*	*High level joists or upper ledges which are not easily visible*

Annex 2 – Signposting Document: Welfare Standards

Welfare standards on site should comply with relevant legislation, including Schedule 2 of the Construction Design Management (CDM) Regulations 2015 and the Workplace (Health, Safety and Welfare) Regulations 1992. The employer of the Analyst should ensure that the LARC / Client has provided welfare to a compliant standard during the step 1 risk assessment process.

1. **Toilet Facilities –**
    - There should be enough toilets for the amount of people likely to use them (1: 5 ratio of toilets per person).
    - Toilets should be clean, orderly, adequately ventilated, and lit.
    - Separate facilities should be provided for men and women, or, with a door that is lockable from the inside.
    - Sanitary waste disposal facilities should be provided.
    - Toilets should be available all the time whilst workers are at site, and the distance to access them should be as short as possible from the furthest part of the site.
    - Analysts should be compelled to report poor and unacceptable facilities to their managers.

2. **Washing Facilities –**
    - Washing facilities should be provided in the immediate vicinity of toilets, (whether or not they are provided elsewhere).
    - There should be hot and cold, or warm running water provided so far as is reasonably practicable with soap and towels provided.
    - Sinks should allow you to wash up to your elbows where the work requires.
    - Showers should be provided for licenced asbestos work, and these should be clean, orderly, sufficiently ventilated, and lit.
    - Analysts should be compelled to report poor and unacceptable facilities to their managers.

3. **Drinking Water –**
    - There should be an adequate supply of drinking water provided.

4. **Changing Rooms –**
    - Should be provided for analysts to change (where decontamination procedures require), including seating and lockers for storing personal effects.

5. **Rest Facilities –**
    - Should be provided with tables and chairs, somewhere to prepare a meal, the means to boil water and should be kept to an appropriate temperature.

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Annex 3 - HSE Guidance on Risk Assessment for Compliance with Control of Asbestos Regulations 2012

Risk assessment

Before starting any work that is likely to disturb asbestos, a suitable and sufficient risk assessment must be prepared by the employer.

Whoever carries out the risk assessment must:

- be competent to do the risk assessment
- carry it out before work begins and allow enough time to put appropriate precautions in place
- make sure the assessment is job specific and considers all aspects of the work

Risk assessments are about identifying and controlling the risks:

- establish the potential risk (including general risk such as falls from height) and identify who may be affected
- identify the action to be taken to remove the risk, or if that is not possible, to reduce the risk to as low as possible
- record the findings of the risk assessment, and the action to be taken, and inform employees
- implement the actions to be taken
- review and update the risk assessment as required

Competency

Whoever carries out the risk assessment must have a sufficient level of knowledge, training and expertise. This is to make sure that they understand the risks from asbestos (and general risks) to enable them to make informed decisions about the risks and identify the appropriate action required to reduce them. They will also need to be able to estimate the expected level of exposure to help them decide whether or not the control limit is likely to be exceeded.

Content of the risk assessment

A suitable and sufficient risk assessment should include full details of the work to be undertaken and how long the work is expected to take. It should also include:

- details of the type and quantity of the asbestos
- details of the expected level of exposure
- details of the controls to be used to reduce exposure e.g. use of local exhaust ventilation, controlled wetting, adequate PPE / RPE, use of enclosures
- decontamination procedures for tools, equipment and PPE
- details on how asbestos waste will be managed
- emergency procedures

The significant findings of the assessment should be communicated to employees, and anybody else who could be affected. A copy of the risk assessment must be available on site.