

<b>TECHNICAL GUIDANCE SERIES</b>					
Ref:	NTGS0101	Rev:	0	Date:	1 <sup>st</sup> August 2020

The Technical Guidance Series aims to provide clarity on industry concerns, queries and any issues raised with the core focus on education and improvements.

## Asbestos Register

An asbestos register is a fundamental aspect of successfully managing asbestos within any non-domestic premise.

The size and complexity of the register will be wholly dependent upon the organisation. For example, for a corner shop the register may be a hand noted plan showing the location and extent of all ACMs present, whereas a nationwide retailer would need something far more sophisticated than this.

Irrespective of the organisations size the register must still provide the same basic functions. These are;

- Provide the location of all known or presumed ACMs
- Record the extent and condition of all recorded ACMs

The register must be accessible to all those who would need it. This requires good knowledge within the organisation as to where the register is located and how access is gained. For larger organisations this might be an electronic version and require a username and password as well as the URL.

It is important to recognise that an asbestos register is not just the results of a management survey. It should be an amalgamation of all the materials that have been identified on any survey that has been conducted on the premises. This will include historical management surveys, possibly Type 2 surveys undertaken under MDHS 100, and potentially refurbishment surveys.

Refurbishment surveys will expose additional areas of a building not normally accessed during a management survey. Even if the materials are subsequently removed, they should still be added to the register as this may help to inform future schemes within the building or similarly constructed premises within the same organisation.

When a refurbishment or even demolition survey is undertaken the general principle is that any ACMs identified will be removed. This may not always be the case if the proposed works are postponed, changed or even abandoned all together. In such circumstances the knowledge gained on the presence of asbestos within the building could be lost if it isn't added to the register.

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Photographs of each ACM identified are extremely important to be included as this will greatly assist in the identification of the material by those who refer to the register. These are also essential in the on-going management of the materials as it provides a record of the condition of the material at the time of the inspection.

On a periodic basis every ACM in the register needs to be re-inspected by a competent person. These inspections must be used to update the register so that the most current information is contained and therefore the document remains 'live'.

It is unlikely that the same person will undertake the re-inspection as who undertook the previous inspection. To retain some consistency the previous photograph should be used to assess whether the condition of the material has deteriorated since the last inspection.

Whilst the main purpose of an asbestos register is to hold information on ACMs, those involved in managing asbestos would benefit from additional information being contained. If materials that don't contain asbestos but look similar to those that do were also contained within the register it might reduce the need to recall asbestos surveyors to site to reassess the material.

Each individual application of a material should be recorded. Where multiple applications exist within the same space it would not be uncommon for the survey report to include a single photograph and a note stating the number of occurrences. If this was directly transferred into the register it could make subsequent re-inspections problematic if the condition of one application changes.

An asbestos register must remain live and accurate reflecting the materials present throughout the premises it covers. Maintaining the relevance of the register will include recording any remedial work undertaken on an ACM; for example, the removal of any products as well as any repairs or treatments.

Consideration also needs to be given to those who may need to use the register and therefore its ease of use and functionality are important. A manager may wish to review information such as the number of ACMs and the risk scores. However, a trades person is more likely to rely heavily on the drawings and as such they need to be accurate and a true reflection of location and extent of ACMs along with any restrictions such as areas not accessed or presumptions.

The greater the quality of the information contained the more assistance it will provide in the management of asbestos.

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## Re-Inspection Survey and Report

The Control of Asbestos Regulations 2012 requires that any known asbestos containing material is re-inspected on a period basis. It is the Duty Holder's responsibility to determine what that inspection period should be.

There are many factors that will affect the time period for inspections and these have to be considered when the decision is made. In essence high risk materials will be inspected more frequently. Low risk materials where the matrix makes fibre release very difficult are likely to have extended inspection periods.

For example, bitumen sink pads and vinyl floor tiles, under normal circumstance, are unlikely to release fibres regardless and it could be considered that an inspection period of 3 – 5 years would be suitable. However, accessible higher risk materials such as asbestos insulating board and insulation may need to be inspected more frequently than annually.

Whatever time frame is used for the inspection program the Duty Holder should justify the decision made and record it within their management plan.

The purpose of the re-inspection is to determine if any of the identified asbestos materials have deteriorated since the last inspection. Therefore, the only element of the material assessment score that would need to be inspected would be the 'Extent of Damage'. The product and asbestos type would not have changed and neither should the surface treatment. For the 'Surface Treatment' to have altered work would have been undertaken on the ACM. This should have been reflected within the asbestos register at the time the work was completed.

The assessment of damage to a material can be subjective. What one surveyor records as medium damage others may record as either low or high. The key to a successful re-inspection is consistency. The previous information should be used to assess the current conditions and then any changes can be noted.

If the organisation undertaking the re-inspection has accreditation to ISO 17020 then their scope should be extended to include this activity.

HSG 264 Asbestos: The Survey Guide should be used as guidance for the report.

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The report should still have an introduction that explains what was done and why. However, the main focus should be the executive summary.

An executive summary within a Management, Refurbishment or Demolition Survey report will detail what asbestos has been found, its condition and suggested actions to be taken. When a re-inspection is undertaken the asbestos items are already known and therefore simply repeating this information provides the Duty Holder with no value.

The purpose of the inspection is to evaluate if any of the ACMs have deteriorated. This should therefore be the content of the executive summary. The Duty Holder should be able to identify which materials have degraded since the last inspection and where they need to act. It may also be useful to highlight any remaining ACMs that are in poor condition where urgent action is also required.

The main section of the report would then detail all of the technical aspects of all asbestos materials that have been re-inspected with a current picture showing that material. This information would then be used to update the asbestos register to ensure that a current photographic record is available for each asbestos material.

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## Survey Reports

Objective: Survey reports – model types of reports, the detail that is commonly missing from reports including building descriptions

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This guidance should be applied to all survey types comprising Management, Refurbishment and Demolition. It should also be applied to Re-inspections.

To effectively manage ACMs, a survey must be fit for purpose. Similarly, a good survey must be partnered by a good survey report otherwise the surveys effectiveness is jeopardised.

The key to an effective survey is in the planning as per Section 4 of HSG264. There must be a suitable exchange of information between the client and surveyor whereby a formal agreement is made of exactly what will be delivered, why, how, when and how much it will cost.

The first problem reflected in a survey report is that of poor planning. The industry needs more than 'just turning up' to do a survey. All survey types need careful planning to deliver a fit for purpose and well understood report. A UKAS Accredited organisation should habitually conduct this thorough planning process whereas a sole trader may not be as thorough.

Survey planning and survey execution aside, common problems encountered within the industry stem from poor report templates or poor transposition of survey data, further compounded by poor final review.

The survey report must present the data in a clear and unambiguous fashion which must also be user-friendly and presented in easy to understand 'layman's' terms.

HSG 264 Asbestos: The Survey Guide should be used as initial guidance for the report. As it states, the survey report is a record of the information collected at a particular time on the presence and condition of ACMs.

A survey report should contain the following sections:

- Executive summary
- Introduction covering the scope of work
- General site and survey information
- Survey results (including material assessment results)

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- Conclusions and actions
- Bulk analysis results

There is no need to repeat HSG264 text here, please refer to section 6 of HSG264 for full details.

To put it simply, the survey report is your last chance to showcase the skills of the surveyor, to present your data in the best way possible to suit your clients' needs. It is your final chance to shine and to make yourself 'bullet-proof' by clearly stating what you DID and as important, what you DID NOT do.

As per HSG264 Section 7, 'Dutyholder's use of survey information', we should encourage our clients to check the accuracy of our survey reports as per Box 11. We must encourage more accountability from our clients; did we do what we said we would do?

An excellent way to take your chance to shine is to present your reports to your clients. This of course wouldn't be practical for a volume based social housing contract but is far more relevant and extremely useful for buildings with numerous ACMs and recommended remedial actions. Sit with your clients, talk them through the report contents and give them peace of mind they are in safe hands. In some cases, you'll be delivering bad news, so do it well.

The following list details common mistakes of report templates:

- Too generic; site specific data hidden amongst huge amounts of generic text
- 'Site specific' data not specific enough
- Vague building descriptions – you should fully and accurately describe the building you surveyed; not just 'We carried out a management survey of a commercial office block'; you need to describe its general construction, it's age, it's use, the number of floors, total floor area, any unique features etc
- Vague 'Scope of Work' – again you need to fully describe exactly what you did; not just 'Refurbishment Survey for Planned Works', describe exactly what the planned works are and therefore how your survey was tailored to be fit for purpose, what rooms were affected and the level of intrusion and tidying/making good that was agreed
- Mixed survey types should be very clear which rooms/areas were subjected to what type of survey eg a Management Survey with targeted Refurbishment work; or Reinspection Survey with 'no-access' rooms subject to Management Survey – provide clarity
- Data transposition errors not picked up during production / first review (resulting in missing or incorrect ACMs, spelling mistakes, inconsistent reference numbers etc)
- Material Assessments not as per HSG264 (you can go 'off-peak' but does your client agree and is it as good as, if not better than HSG264? But remember the guidance is there to help standardise the industry, going with your own scoring system is unnecessary)
- Priority Assessments (as per HSG227) not present and/or not stated that the client has a duty to review PA scores if they have been applied by the Surveyor only
- Poor descriptions of ACMs making them difficult to locate

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- Lead Surveyor poor review (over reliance on production team)
- Lead Surveyor has not authorised the report
- No clear data (ie table) of areas not surveyed (No Access)
- No clear data of areas with restricted or limited access
- Single man surveys resulting in too many no-access areas in the report (where a 2-man team would have been far more useful to inspect at a higher level)
- Missing photographs
- Photographs not clear / too close to the ACM; no perspective
- Plans using simple icons in rooms to demarcate an ACM present rather than a hatched area
- General building materials not mentioned (ie in each room, from ceiling, walls, floor, fixtures & fittings, accessible voids etc)

A major factor of difference in report formats is whether the general materials within each room need to be stated. Some reports will simply state “Room 1 - No ACMs found at time of survey”. This provides very little information nor confidence that the room has been adequately inspected.

Where a full breakdown of the room is included, it firstly shows that all elements have been inspected and also makes for a more useful report for the client.

As members of either NORAC or FAAM, we would expect to see information detailing the general construction materials within each room; from ceiling, walls, floor, boxings, fixtures & fittings, insulation materials and what was found within accessible voids or behind sacrificial coverings (where the scope allows).

This could be blocked together as Rooms 1 – 10 contained XYZ findings rather than a repeat of the same information for 10 rooms.

Reports presented this way are more likely to instil habitual inspection techniques which check and capture all data, produce a more useful report and bring the consistency which is much needed.

Another factor to consider is the financial side; this consistency of data capture and presentation will help bridge the gap between a fair price for a sustainable business and the cheap unsustainable prices that are often seen.