

Asbestos Licensing Unit (ALU)
Asbestos Liaison Group (ALG)
ALG Memo 04/12

ALG memos are produced by the ALG to provide information and guidance to the asbestos industry and other interested stakeholders.

Date: October 2012

Subject: Suitable and sufficient plans of work (aka method statements)

Background and intended audience

This memo amends the previous version (ALG Memo 06/08), which should be destroyed.

Licensed contractors	This guidance explains the purpose of a plan of work and provides direction regarding the kind of detail to be included.
Clients, contractors and other 3 rd parties	The guidance helps these groups understand the issues a licensed contractor must address as part of their notified work.

Suitable and sufficient plans of work are a licence condition and legal requirement. HSE views the plan of work as a critical element of management control. Despite this position, problems with plans of work appear to be commonplace. Common failings include:

- A lack of clarity about what work is to be done and in what context (how much asbestos is there, where is it and how is it fixed, how will exposure be prevented or reduced?).
- A lack of useful detail in site diagrams, or diagrams which bear little or no resemblance to site reality. The use of lengthy text descriptions where photographs, flow charts or diagrams etc. would be easier to use.
- Generic contents and accompanying generic/standardised assessments. Such information often has no useful purpose at all, or at best, would be more appropriately placed within standard procedure documents.

Purpose of the plan of work

The suitable and sufficient plan of work (method statement, plan, POW) will be a **practical and useful** document, describing a safe working method for site staff to follow.

It is an essential tool for **senior management control**. It shows that senior managers have considered significant site risks (asbestos and otherwise) and produced a specific job instruction to address them. It will be detailed enough for managers (or clients, HSE Inspectors, etc) to use when measuring the performance of site teams.

These general points should be remembered by those writing, using or reviewing plans of work, regardless of the following more detailed guidance. In short, if the plan does not add value by helping supervisors and operatives (and their managers) carry out the work appropriately, it will not be suitable and sufficient.

Who creates the plan/when

The plan **must** be produced prior to notification*. It will draw together the crucial elements of risk assessments that have been carried out for the particular circumstances. It will

therefore be drawn up by a suitably competent manager, following a full appraisal of the site and thorough discussions with relevant third parties and the client. The person preparing the plan will need a very good knowledge of appropriate working methods, the particular requirements of licensed asbestos work and the requirements of the particular site. It is expected that these requirements will be made clear to all parties. Where risk assessment and planning has been thorough, amendments to plans should be minor and rare.

The most effective planning will involve input from site teams, i.e. the operational staff who carry out/directly supervise the asbestos work. Where this is not possible, arrangements must be made to make sure that there is good communication between the author of the plan and the site team, before the job starts.

*** If a “suitable and sufficient” plan is not available at the time of notification, the notification will be considered invalid and rejected by the enforcing authority.**

Suitable and sufficient plans of work – contents

The work is notified and planned *because* asbestos contamination is a significant risk. The plan must clearly describe how disturbance and spread is to be minimised or prevented.

A suitable and sufficient plan will be in a style and format that is easy for site teams to use. Lengthy text documents are unlikely to be the most appropriate way of achieving this: diagrams, flow charts, photographs and similar are likely to be much more effective. The most crucial information about removal methods, controls and containment might be usefully summarised into a single page (for all but the most complex of jobs, where a sequence of such ‘summaries’ would be useful) that can act as a quick reference guide for those on site.

Generic information about frequently used company procedures (such as detail on standard expectations for bagging waste, basic set up for decontamination units, standard enclosure construction materials, etc) will **not** need to be in the site-specific plan. Such information may form part of general procedures or health and safety policy documents and will be available on site for reference. An Asbestos Licensing Principal Inspector (ALPI) might expect to see these during a licence assessment interview and such procedures should be incorporated into induction training for new staff. Standard procedures/management arrangements would also describe how senior managers monitor and measure the performance on sites they are responsible for and how **unavoidable** amendments to plans are managed.

The [appendix](#) to this memo provides further general guidance. This should be read in conjunction with Regulation 7 (and the accompanying approved code of practice and guidance (L143)) and chapter 3 of HSG 247. See below for references. Those responsible for writing a plan should not forget its main purpose: it is management’s instruction to the site team, addressing the specific situation at hand.

How the plan of work is used

By site teams

The plan is the record of how senior managers want the job to be done. Its main purpose is to guide site work and it must **always** be on site as a live document. A copy should also be kept at the head office to enable management to effectively monitor performance. Access to general procedures will also be available at site level, either as paper copies or via computer access.

Many/most third parties (clients, contractors, members of the public, etc), will **not** be aware of the standards expected of licence holders with regards to pre-planning. This can often result in site teams making “forced” changes to enclosures, transit routes, etc. The licensed contractor must take all reasonable steps to ensure any relevant parties are aware of their requirements for notified work. This should be reflected in tender discussions and contractual agreements.

Where site teams arrive on site to find that the plan is no longer accurate, this may often indicate that initial planning was NOT suitable and sufficient and licence conditions were not met. Before starting work, supervisors should discuss significant changes to the plan with senior management, who will be responsible for approving the change, or not. The types of changes deemed ‘significant’ must be clearly defined and understood by site supervisors and managers.

Operatives are often asked to ‘sign’ the plan to indicate that it has been “read and understood.” This often appears to be an attempt to limit the licence holder’s liability for the actions of its staff. All employers are required to ensure effective supervision, which is much more than simply providing information. Please see the ALG memo on supervision, for further detail. In many cases, plans are ‘signed’ by staff, even though the content is generic, difficult to use and therefore will have little practical value. In such cases, it is likely that the operatives’ signatures will have little bearing on HSE’s assessment of management control.

By managers

A plan should be prepared by a competent senior manager who has visited site and liaised with all relevant parties. The plan is a record of how senior management expect the job to be done. It is **not** the site supervisor’s role to determine the method of work.

Small organisations are NOT exempt from the need to produce written plans of work, prior to notification. In very small organisations, it is possible that the person preparing the plan is also the person supervising the work. A written plan is still required, prior to notification and this ensures that the organisation is prompted to plan and prepare thoroughly in advance of asbestos works. It also allows the enforcing authority (and others) to examine the extent of the works, if desired and it ensures a level playing field amongst licence contractors.

As the plan is crucial to management control, managers should be able to measure the performance and progress of site teams against the plan. It will not be “suitable and sufficient” if it does not enable this. As stated above, where site teams arrive on site to find that the plan is no longer accurate, this may often indicate that initial planning was NOT suitable and sufficient and licence conditions were not met. For significant changes, senior manager approval will always be needed. In any case, work should not go ahead until legal requirements and licence conditions have been met.

Licence holders’ managers and supervisors must actively monitor the work of site teams under their control. This is to ensure that

- (a) the plan is followed and control measures are properly used; and
- (b) the control measures specified in the plan of work are effective.

Day to day site control may be the responsibility of supervisors, but managers (and external auditors directed by managers) need to satisfy themselves that work is being carried out as intended and this will require a proportion of site visits.

Viewing panels/CCTV should enable all aspects of the work to be seen and compared against the plan. Advances in mobile information technology mean that remote checks and measures are increasingly easy. It is reasonable to expect managers to routinely make use

of digital photography and mobile phones/hand held devices, CCTV, etc in order to track the progress of work on site.

By other interested parties, including enforcing authorities

A suitable and sufficient plan describes the scope of the work and where it was carried out. Analysts will therefore refer to the plan when carrying out four stage clearance, providing assurances that the work areas are clean and fit for re-occupation.

Principal contractors (or others with responsibility for multiple contractors on a single site) can refer to the plan to ensure appropriate programming, management and co-ordination.

Enforcing Authority inspectors and clients can use the POW in the same way as the licence holders' senior managers, i.e. they will be able to measure the progress and performance of site teams against it.

The plan may be requested by the Enforcing Authority before work starts, but it is not for the Enforcing Authority to approve. Where inspections find that ongoing work does not accurately reflect the plan, this is likely to raise serious concerns about management arrangements, triggering a licence review.

All organisations are reminded that HSE does **not** want to see unnecessarily lengthy and complicated documents. To be suitable and sufficient, the plan will be *useful* for guiding site teams with the work at hand.

Further information and references

- 1) Condition 3 of a standard asbestos licence requires:
 - a) Prior to submitting a notification, a plan of work must be prepared including a written specification of the equipment to be used.
 - b) Work must be carried out in accordance with the plan/equipment specified.
- 2) Control of Asbestos Regulations 2012
 - a) Regulation 7 states the legal requirements relating to plans of work.
 - b) HSE publication L143 (***Work with materials containing asbestos***) provides supplementary approved code of practice and guidance in preparing plans of work at paragraphs 76 – 86.
- 3) ***Asbestos: the licensed contractors' guide*** (HSG247) provides guidance on plans of work from paragraph 3.16 – 3.31
- 4) Information on the Asbestos Liaison Group (including a range of memos) is available on the HSE's website: hse.gov.uk/aboutus/meetings/committees/alg/index.htm
- 5) The HSE web pages on licensing in general can be found here: hse.gov.uk/asbestos/licensing/index.htm

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Appendix

Suitable and sufficient plans – format and contents

It is impossible to be entirely prescriptive about the precise form a plan will take. Any reader should quickly be able to establish the nature of the work and control measures to be implemented. Suitable and sufficient plans are likely to (a) use diagrams/photographs, (b) be laid out clearly and (c) avoid generic information. Plans are likely to include the following:

- 1) **DETAILS OF CONTRACT & SCOPE OF THE WORK** - work location and attendance times/dates, contact details, supervisor, client, analyst, survey details, principal contractor/co-ordinator (where relevant), senior manager responsible for the contract, etc. The scope of the work should be obvious: what does the team have to do and what are the constraints of the site? It will always clearly explain what asbestos is to be removed and how.
- 2) **EQUIPMENT, MATERIALS & CONTROLS** - for example:
 - a) Precise location and dimension of the enclosure, airlock and bag lock. Details of how air is to be managed within it. Arrangements for smoke testing and witnessing.
 - b) Location of transit routes and any other relevant exclusion areas.
 - c) Specification and location of equipment used to prevent exposure and spread (where applicable): RPE/ PPE, DCUs, H-Vacs, NPUs, CCTV/viewing panels, wet-strip equipment, hand tools, sprays, gels, fencing/barriers and signage, etc.
 - d) Location and access arrangements for water and power supplies and DCU drainage.
 - e) Expected quantities of waste and methods of wrapping or bagging/storage/transport.
 - f) Location and access to welfare facilities.
- 3) **OTHER RELEVANT SITE SPECIFIC INFORMATION** – for example:
 - a) Clear responsibilities and lines of communication with relevant third parties (tenants, office staff, other contractors, other licence holders, etc). Adequate pre-planning will ensure that others will not have a negative impact on the licence holder's plans.
 - b) Emergency arrangements and procedures.
 - c) Any other **significant** risks (including how they will be controlled).
- 4) **METHOD OF WORK**

This will be the central part of a plan explaining how exposure and spread will be minimised. For example:

 - a) It will explain the site specific *sequence* of work and *actual methods* to be used for reducing exposure and spread.
 - b) The method will be detailed enough for visiting managers (and others) to measure compliance and performance. It will also reflect relevant non-asbestos factors (such as working at height, working in confined spaces, live electrical installations).
- 5) **MANAGEMENT ARRANGEMENTS**

The plan is a management tool as well as a guide for site teams, so it should be clear how the licence holder expects supervisors/managers to ensure that the working methods are followed. By way of example, the plan might specify 'hold points' during the notified work and senior management would require e-mailed photographic evidence that these have been successfully achieved. Other 'management' issues will include:

 - a) Air monitoring/background reassurance monitoring (and relevant information about expected exposures).
 - b) Arrangements for providing independent 4-stage clearance.
 - c) Arrangements for handling **unavoidable** changes to the original plan.

THIS IS NOT INTENDED TO BE AN EXHAUSTIVE LIST
See HSE publications HSG247 and L143 for further information