Appendix 2/15

Minutes of the 15th meeting of the ALG Technical Working Group, 24 February 2015

Documentation Required on Site for Licensed Asbestos Removal Works

Appendices are attached to Technical 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.

General

ALU Memo 01/12 dated 8th November 2012 provides information on the records which should be available on site for the duration of asbestos removal works. This memo is in addition to the information contained within paragraph 3.45 of HSG 247, Asbestos: The licensed contractors guide.

Historically documentation has been provided in a hard copy paper format. However, with the growing abundance of hand held electronic systems, electronic versions of documentation are also found on site.

Electronic documentation is acceptable provided it is fit for purpose in line with how the licence holder manages their work.

Key Considerations:

Documentation must always be readily available on site and therefore when using electronic systems consideration needs to be given to circumstances which could prevent this. For example:

- Power failure
- Suitable version control
- Auditing of the system and accessibility
- Reliance on network signals that don't reach remote work areas
- Other IT system gremlins / breakdown
- Skills and expertise to demonstrate traceability

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Where documentation is not available through system or power failures etc. this will be interpreted as a failure to have documents on site and dealt with it by way of licensing/enforcement as appropriate.

Electronic documents must be useable both by site staff and managers alike. They must also contain traceability with identification of issue or version numbers plus changes for audit purposes.

Documents which need to be read on site such as the plan of work and risk assessments and may require amending need to allow for this whether available as an electronic or paper copy. Other documentation which is completed on site such as daily record checks must contain sufficient security measures to prevent alteration after completion. If alterations are required these must be traceable (e.g. use of amendment sheets).

In Summary

All documentation whether in paper or electronic formats must be:

- Usable
- Inform the way work is managed
- Capable of being used as a management tool
- Auditable by the visiting inspector.

If there are any doubts about the points above then the documentation would not be considered as 'fit for purpose'.

It should also be noted where paper formats are used. If original certificates are not available on site, the copies kept on site should be authenticated at a senior management level to provide confirmation of their validity.