

Changes to the BDA audit requirements – Asbestos Awareness Training

Analysis of BDA Audit statistics has identified a gap in the training for Lead Drillers and Support Operatives from participating member organisations. Data collected over the last 3 years shows that 25% of auditees have not received formal asbestos training. The BDA has prepared the following guidance in reference to this gap in knowledge.

It is widely reported that 80 to 90% of brownfield sites in the UK may be contaminated by asbestos containing materials (ACMs). The Control of Asbestos Regulations 2012 (CAR 2012) states that "... all staff who could foreseeably encounter or accidentally disturb asbestos during the works, as well as their supervisors and managers, must have basic Asbestos Awareness Training (AAT)." Therefore, as a large proportion of ground investigation sites in the UK are brownfield and likely to be affected by Made Ground, good practice dictates that all drilling operatives should undertake AAT as a minimum.

AAT is designed to inform people of the history and dangers of asbestos, where it might be found and to identify potential asbestos containing materials (ACMs). Trained personnel are then in a position where they can identify ACMs and know to immediately stop work if suspected asbestos is encountered.

AAT is not enough on its own to allow individuals to prepare an asbestos risk assessment, carry out a dynamic risk assessment on-site, or knowingly carry out work where asbestos or suspected asbestos is known to be found. This means if site operatives are carrying out an intrusive ground investigation on brownfield sites where asbestos is suspected to be present, and are likely to disturb ACMs during their works, or need to sample, measure, and photograph its presence, additional training is required. In these circumstances AAT is not sufficient.

When identifying suitable AAT, the BDA recommends that, where possible, operatives undertake a task-specific asbestos awareness course focussed on ground engineering or geotechnical works. Furthermore, where any sub-sampling or handling, as opposed to covering up of ACM is required, this constitutes Non-Licensed Work (NLW). As such, CAR 2012 requires that non-licensed asbestos training be undertaken by all site staff involved. The BDA would recommend this NLW training is also task specific.

BDA audit expectations

From 1st October 2024 it will become a mandatory requirement that all auditees undertaking the BDA audit will have completed Asbestos Awareness Training. Evidence of this training will be a prerequisite to the audit being undertaken. As refresher training for AAT is not mandated by the HSE, expiry dates on AAT certification will not be a barrier to audits being undertaken. However, the BDA recommends that, in line with HSE guidance, some form of refresher should be given, as necessary, to help ensure knowledge of asbestos awareness is maintained. This informal refresher will not be checked as part of the audit process.