



Asbestos Incident Management Procedure

Status:	Current	Supersedes: All previous Rockhampton Girls Grammar School Asbestos Incident Management Procedures.
Authorised by:	Girls Grammar Executive	Date of Authorisation: July 2024
Reference Documents:	• <i>RGGS-690-PLN-ASBESTOS MANAGEMENT PLAN</i> • <i>RGGS-691-PRO-ASBESTOS MANAGEMENT PROCEDURE</i> • <i>RGGS-720-GDL-ASBESTOS MANAGEMENT POSTER</i> • <i>Work Health and Safety Act 2011 (Qld)</i> • <i>Work Health and Safety Regulation 2011 (Qld), Chapter 8</i> • <i>How to safely remove asbestos Code of Practice 2021</i> • <i>How to manage and control asbestos in the workplace Code of Practice 2021</i> • <i>Public Records Act 2002 (Qld)</i>	
Review Date:	This policy will be reviewed every three (3) years, or as appropriate, to take account of new legislation or changes to school's operations and practices and to make sure it remains appropriate to the changing environment.	Next Review Date: July 2027
Policy Owner:	Board of Trustees of Rockhampton Girls Grammar School <i>trading as</i> Rockhampton Girls Grammar School CRICOS Provider No: 00508E	Access: All RGGS Staff - Policies Procedures and Forms\WH&S DOCUMENTS\POLICIES AND PROCEDURES



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1. PURPOSE

This procedure outlines the responsibilities and processes for the consistent management of asbestos-related incidents that involve building materials associated with or brought onto Rockhampton Girls Grammar School facilities.

This procedure addresses incident reporting, recording, notification and investigation of asbestos-related incidents.

This procedure provides directions to employees for incidents, i.e. incidents that occur during:

- general facility business operations, i.e., the activities associated with the primary purpose of the school
- works undertaken by service providers, where the incident affects or potentially affects the safety of the school community (see definition):
 - during the facility's business operations, for example, potential exposure to asbestos created as a result of a service provider accidentally damaging an asbestos containing school hallway wall during school operations, or
 - when facility business operations recommence, for example, weekend works leaving assumed or confirmed Asbestos Containing Material (ACM) with unsealed penetrations.

The **ASBESTOS MANAGEMENT PROCEDURE (RGGS-691-PRO)** deals with incidents associated with the discovery of asbestos in soil.

Asbestos-related incidents (as defined in the definitions table) may include:

- the conduct of activities that are prohibited under legislation, such as service work on friable ACM.
- accidental damage, for example, breakage of external wall sheeting caused by students' ball games
- intentional damage, for example, vandalism
- the conduct of unauthorised asbestos work, for example, an employee installing a picture hook on an assumed ACM
- the conduct of authorised but unsafe asbestos work, for example, service provider failing to use a method that suppresses dust when drilling into non-friable (bonded) ACM
- the presence of potentially unsafe material that is accessible post works, for example, discovery of dust deposits below an area in which an air-conditioning unit has been installed on an assumed ACM wall
- the discovery of asbestos in soils for which there is no formal arrangements in place to manage the discovery, for example, there is no safe work method statement outlining how a discovery of ACM during excavation activities will be safely managed
- the discovery of suspected asbestos containing dust or debris or loose or stored suspected ACM that is not linked to works or an excavation discovery, for example, the discovery of deposits of debris resembling ACM debris behind a cupboard in a storeroom.

This procedure supports the **ASBESTOS MANAGEMENT PLAN (RGGS-690-PLN)** and should be read in conjunction with the **ASBESTOS MANAGEMENT PROCEDURE (RGGS-690-PRO)**.

2. RESPONSIBILITIES

2.1. ALL EMPLOYEES

- not touch dust suspected to contain asbestos or handle discovered assumed or confirmed ACM debris
- initiate immediate response actions where suspected asbestos-related incidents are identified
- comply with record retention requirements for records associated with asbestos-related incidents

2.2. OFFICER IN CHARGE (PRINCIPAL)

The Officer in charge (OIC) is the accountable officer for asbestos management at a facility and consequently responsible for ensuring all responsibilities are implemented. Some of the responsibilities:

- must be exercised only by the OIC (these responsibilities are not delegable and will generally be expressed in the procedure as something the OIC 'must' do, for example, "the OIC must give XYZ to a person")
- may be carried out by departmental employees who have received formal delegation (and completed the associated training) to exercise the responsibility (these responsibilities will

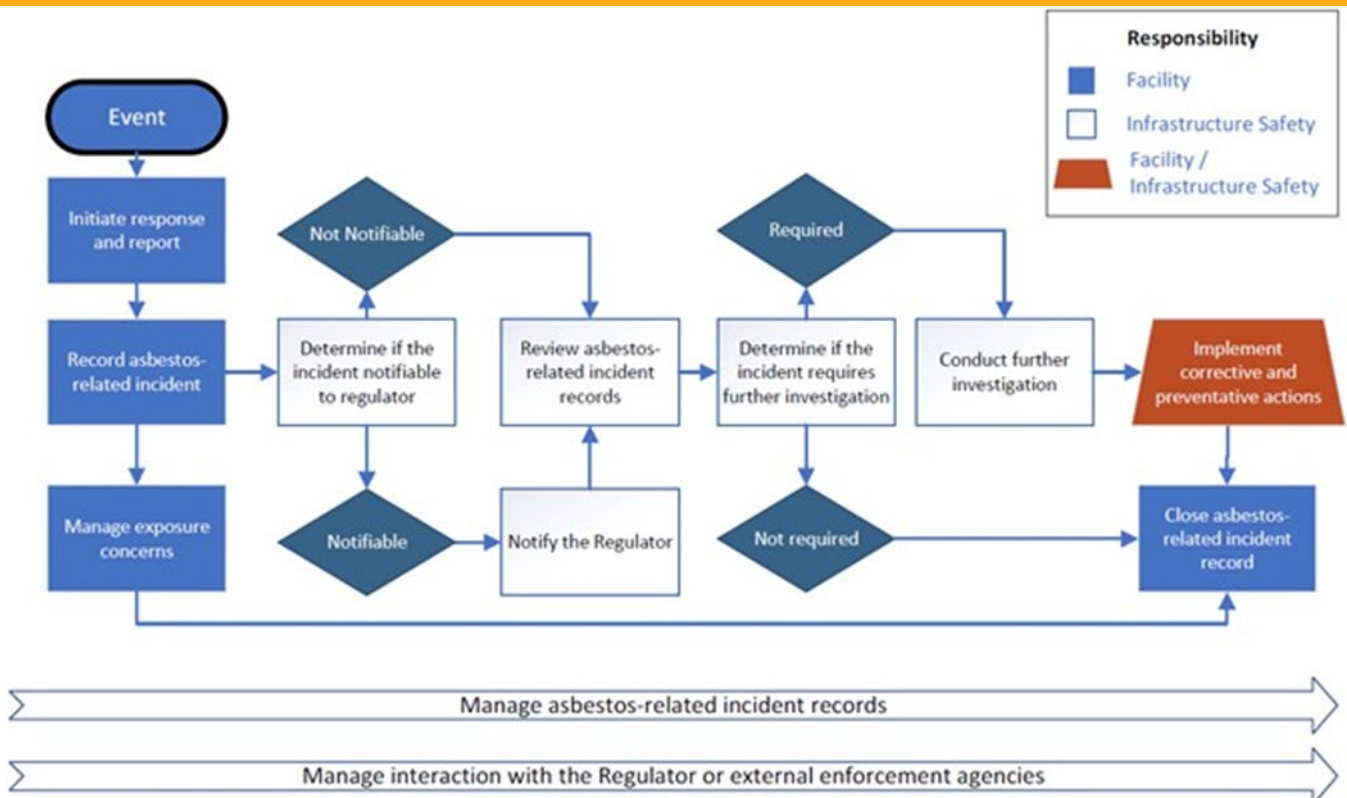
generally be expressed in the procedure as something the OIC or an OIC delegate must do, for example, “the OIC or OIC delegate must give XYZ to a person”).

- may be carried out in accordance with instructions and systems, approved by the OIC, to support the responsibility being met (these will generally be expressed in the procedure as something the OIC must ‘ensure’ is done, for example, “the OIC must ensure XYZ is installed”).
- establish formal delegations for asbestos incident management activities
- ensure responses are initiated for suspected asbestos-related incidents and establish processes for reporting incidents that occur outside of normal operational hours
- ensure asbestos dangerous incident scenes remain preserved until released by the Regulator
- ensure management actions are initiated for asbestos-related incidents
- ensure parents/carers are notified of student proximity incidents and people with concerns of personal exposure to airborne asbestos are supported
- ensure additional information, as required, is provided to support Regulator incident notification
- ensure corrective and preventative actions are developed, as relevant, and implemented for asbestos-related incidents
- consider and approve asbestos incident-related parent/carers letters.

2.3. INFRASTRUCTURE SAFETY (FACILITY & SERVICES MANAGER)

- ensure that the Regulator is notified of asbestos dangerous incidents
- ensure asbestos-related incident records are reviewed to confirm completeness and adequacy of corrective and preventative actions
- ensure an appropriate level of investigation is carried out for asbestos-related incidents
- ensure suitable corporate corrective and preventative actions are implemented for asbestos-related incidents.

3. PROCESS



3.1. INITIATE RESPONSE AND REPORT

3.1.1. INITIATE IMMEDIATE RESPONSE

- *Facilities other than department-owned housing*

If a suspected asbestos-related incident is identified at a facility other than department-owned housing, **employees** must:

- stop all work being conducted by the employees
- not touch or further disturb the scene of the incident (including any plant associated with the incident)
- not touch dust suspected to contain asbestos or handle discovered assumed or confirmed ACM debris
- take steps to restrict access to the area where the incident has occurred. Seek assistance if necessary. Examples of restriction actions include:
 - locking the door to the area
 - installing barricading
- install signage to warn people of the danger
- report the incident:
 - immediately to a person identified in the facility's **Asbestos management poster** (Appendix A)
 - to the employees' supervisor as soon as possible.

If an incident involves an individual coming into contact with suspected ACM the person who is responding to the incident must take reasonably practicable steps to minimise the personal exposure of the individual, for example by arranging for the clothing, head and face of the individual to be dampened with water to limit any further generation of dust. This may be achieved by using fabric, such as a wet towel.

A person responding to an incident may contact the relevant Regional Infrastructure Advisor or Infrastructure Safety Regional Senior Safety Advisor for advice on disposing of the clothing and other affected materials.

The **OIC** must:

- determine the reporting processes to be applied for incidents that occur outside of normal operational hours
- communicate the reporting processes to relevant departmental employees.

- *Department-owned housing*

If a tenant of department-owned housing identifies a damaged material which is suspected to be ACM, the **tenant** must:

- not touch or disturb the damaged material
- report the damage in accordance with the relevant tenancy agreement..

3.1.2. SECURE THE SCENE

The OIC must ensure that the scene of a suspected asbestos dangerous incident remains secure and undisturbed (to preserve all evidence) until:

- it is determined the suspected asbestos dangerous incident is not notifiable to the Regulator, or
- the Regulator gives permission for the scene to be disturbed.

The OIC may form this suspicion because the incident involved a member of the facility community being in a location where works have been carried out on ACM and the works have generated dust or debris.

Further, the OIC may contact Infrastructure Safety for information on whether an incident is likely to be an asbestos dangerous incident.

The OIC or an OIC delegate may authorise the disturbance of an asbestos dangerous incident scene for reuse, after:

- permission has been granted by the Regulator
- a competent person has conducted a clearance inspection, including air monitoring.

3.1.3. ACTIONS IN RESPONSE TO REPORT

Where the incident relates to suspected in-situ ACM, the OIC must ensure the asbestos register is checked, to determine whether the incident involves assumed or confirmed ACM (i.e., the disturbed item is listed on the asbestos register).



Where the incident relates to the discovery of suspected asbestos containing dust, debris or stored materials, the OIC must ensure:

- the asbestos register is checked, to determine whether the incident is likely to involve assumed or confirmed ACM (e.g., debris which is directly associated with a disturbed asbestos register entry), or
- the discovered dust, debris or stored material is treated as assumed asbestos until proven otherwise by sample analysis.

Where the asbestos register check determines that the matter does not involve assumed or confirmed ACM, the OIC:

- may reinstate access to the area
- must ensure the reporting party is advised of the result of the check
- must ensure rectification actions are initiated as necessary, for example, to repair any damage.

Where the asbestos register check determines that the incident involves assumed or confirmed asbestos, or the incident involves suspected asbestos containing dust, debris or stored materials, the OIC must ensure:

- Relevant party is contacted to initiate specific incident response action, including
 - make-safe actions (refer to the Asbestos management procedure for applying make-safe actions)
 - sample analysis of assumed ACMs or suspected asbestos containing dust, debris or stored materials
 - disposal of discovered materials
- reasonably practicable steps are taken to minimise exposure of an individual whose clothing has come into contact with the dust, for example, by arranging for the individual's clothing to be removed while it is damp and having it placed in a plastic bag and sealed.
- details of the incident are communicated to relevant employees including:
 - the result of the check of the asbestos register
 - the response actions
 - precautions to be exercised for the duration of the incident response.

Employees must not carry out make-safe activities for assumed or confirmed ACM.

School rubbish bins must not be used for the disposal of any confirmed or suspected ACM.

3.2. RECORD ASBESTOS-RELATED INCIDENTS

The OIC or an OIC delegate must advise trained employees of the information to be presented in the asbestos-related incident record.

Employees must seek the advice of the OIC or OIC delegate before creating and updating the asbestos-related incident record.

The OIC must ensure the following quick assessment information is recorded for asbestos-related incidents:

- Preliminary details of the incident – date, time, location, reporting officer name
- Incident description – who was involved (service providers and departmental employees), what was involved, method of disturbance, tools used, duration of disturbance and associated exposure)
- Determination of whether the incident qualifies as a student proximity incident
- Initial response actions
- Work area access permit (WAAP) details where relevant
- Date of start work meeting (if held)
- Make-safe details where relevant
- Details of persons who were in the vicinity of the incident
- Relevant asbestos sample details
- Clearance certificate details (i.e., certificates issued after a clearance inspection)
- Details of preliminary incident causes
- Details of corrective and preventative actions for the incident
- Enforcement notice details if relevant

The OIC must ensure all departmental employees with concerns of personal exposure to airborne asbestos are listed in the WHS incident record.

3.3. MANAGE EXPOSURE CONCERNS

3.3.1. NOTIFY PARENTS/CARERS OF STUDENT PROXIMITY INCIDENTS

If a student proximity incident occurs, the OIC must ensure:

- a draft parent/carer letter is prepared
- the draft letter, approved by the OIC
- the approved parent/carer letter is distributed within 24 hours of the incident having been identified or as soon as possible
- further updates are provided to parent/carer as considered appropriate
- records of parent/carer letters are retained

3.3.2. SUPPORTING PERSONS WITH CONCERNS

The OIC must ensure people with concerns about exposure to airborne asbestos are supported in the following way as relevant to the level of concern expressed:

- advise of steps to be taken if the employee experiences health problems believed to be associated with an asbestos incident, including:
 - submitting a workers compensation form (seek advice from the Rehabilitation and Return to Work Coordinator regarding workers compensation lodgement processes)
- advise of the option to register on the National Asbestos Exposure Register managed by the Australian Government

3.3.3. NOTIFY THE REGULATOR OF ASBESTOS DANGEROUS INCIDENTS

The Facilities and Services Manager must ensure:

- reported asbestos-related incidents are assessed to determine if they are notifiable to the Regulator
- the OIC is informed of the determination to support incident scene decisions, i.e., whether the scene can be disturbed for re-use or must remain secure and undisturbed
- asbestos dangerous incidents are notified to the Regulator as soon as possible
- records of asbestos dangerous incident notifications are maintained, including date, time, notification method and notifying officer.

The OIC must ensure any requested additional information is provided to support:

- determinations about incident notification
- submission of notifications.

3.4. REVIEW ASBESTOS-RELATED INCIDENT RECORDS

The Facilities and Services Manager, must ensure that:

- a review of asbestos-related incident quick assessment information is conducted to:
 - confirm completeness of the record details
 - confirm adequacy of the corrective and preventative actions determined by the facility
 - determine whether Infrastructure Safety corrective and preventative actions are necessary
- a determination is made on whether:
 - the asbestos-related incident record is complete and ready for closure, or
 - further investigation is required.

3.5. INVESTIGATE ASBESTOS-RELATED INCIDENTS

The Facilities and Services Manager, must initiate further investigation if the incident is an:

- asbestos dangerous incident, or
- asbestos-related incident that is not notifiable to the Regulator but at least one of the following are applicable to the incident:
 - children were in an enclosed space within 10 minutes of a power tool having been used on ACM or assumed ACM in that enclosed space
 - principal contractor is engaged for the works and the incident had the potential to expose a facility community member to airborne fibres*
 - a member of the department's executive requests an investigation is conducted
 - significant media attention is anticipated, or
 - it was not possible to make credible findings from the quick assessment information.



* Where a principal contractor is engaged for the works and the incident did not have the potential for asbestos exposure to facility community members, investigation of the incident will be at the discretion of the principal contractor in line with the principal contractor's investigation procedure.

The Facilities and Services Manager, must:

- determine whether the incident requires a:
 - standard investigation, or
 - detailed investigation
- appoint the investigator relevant for the investigation type
- initiate strategies for sharing of relevant investigation findings to OICs for facilities to which investigation reports relate and any other relevant parties.

3.5.1. STANDARD INVESTIGATION

The Facilities and Services Manager must:

- conduct the investigation using the School's approved incident causal analysis methodology
- use the standard health and safety investigation report (asbestos) template to compile investigation findings
- relevant incident information is provided
- completion of the investigation is monitored

3.6. IMPLEMENT CORRECTIVE AND PREVENTATIVE ACTIONS

The OIC and the Facilities and Services Manager, must ensure corrective and preventative actions are implemented. Implementation includes:

- consultation with parties allocated corrective and preventative action responsibilities
- recording the approved corrective and preventative actions
- developing of a corrective and preventative action plan if required
- regularly reviewing the progress of implementation to ensure timely completion.

The Facilities and Services Manager, must ensure incident data is monitored to assist in the identification of suitable organisational actions to prevent recurrence of incidents, including the communication of incident learnings to facilities.

3.7. CLOSE ASBESTOS-RELATED INCIDENT RECORD

The OIC or an OIC delegate must close asbestos-related incident records, once all incident-related information has been collected and uploaded.

3.8. MANAGE INTERACTION WITH THE REGULATOR OR EXTERNAL ENFORCEMENT AGENCIES

All employees must manage interactions with the Regulator and other external enforcement agencies for asbestos matters in accordance with the Asbestos management procedure.



4. DEFINITIONS

TERM	DEFINITION
Asbestos Containing Material	For the purposes of this procedure, any material or thing that, as part of its design, contains asbestos and is or has been used as a building material.
Asbestos dangerous incident	An asbestos-related incident that meets the definition of a dangerous incident under the Work Health and Safety Act 2011 (Qld) – an incident in a place of work that exposes a worker, or any other person, to a serious risk to their health or safety from an immediate or imminent exposure to an uncontrolled escape, spillage or leakage of a substance.
Asbestos disturbance	An activity that causes an alteration to the state of an assumed or confirmed ACM.
Asbestos-related incident	An event involving assumed or confirmed asbestos containing building material: 1. relating to work on ACM that is prohibited under the Work Health and Safety Regulation 2011 (Qld) 2. in which the ACM has been disturbed but the disturbance could not have been reasonably foreseen 3. in which the ACM has been disturbed through intentional damage, other than for intended works, to building materials 4. in which the ACM has been disturbed while conducting unauthorised asbestos work (regardless of whether the work was done safely) 5. that has involved asbestos work that has been conducted without appropriate asbestos management control measures 6. in which the ACM has been left in a state that could be unsafe after the works have been completed 7. in which the ACM has been discovered in soil during excavation works and the discovery: • was not anticipated • is not supported by a formal document outlining a detailed response for such discovery 8. that involves the discovery of suspected asbestos containing dust or debris or loose or stored suspected ACM that is not related to asbestos incidents covered by 6. and 7. above.
Asbestos work	Is: • asbestos-related work (as defined under the Work Health and Safety Regulation 2011(Qld)), or • asbestos removal work (regardless of the quantity)
Clearance inspection	An inspection of an area to verify that the area is safe for normal use, that: • includes a visual inspection • may include air monitoring.
Competent person	For this procedure, a person who: • is a licensed asbestos assessor, or • has been assessed to have the necessary skills, experience and qualifications to advise on whether an area is safe for normal use based on: ○ a visual inspection ○ air monitoring.
Corrective action	Steps taken to manage the immediate risks arising from an incident. A corrective action must: • have an assigned responsible party • be subject to consultation with key stakeholders, including parties involved in the incident, health and safety representatives and union delegates • have a specific solution identified that has regard for the hierarchy of control • have an agreed timeframe for implementation.



Detailed investigation	An investigation conducted by a health and safety investigator external to the department and nominated by the Director, Infrastructure Safety.
Employee	For the purposes of this procedure, an employee is a person who carries out the person's day to day work activities under the direction of the department and includes, a public servant, a contractor engaged as a contingent worker, a person engaged through a labour hire firm, a work experience student or a volunteer. An 'employee' does not include a service provider.
School community	Persons who frequent and use a facility for its usual operations. The community includes staff, students and visiting parents and carers.
Hierarchy of control	An order of risk controls based on those that provide the highest level of protection and reliability through to the lowest and least reliable protection.
In-situ asbestos	Asbestos containing materials that remain in the original location in which they were used, for example, asbestos cement sheeting used for lining internal walls.
Make-safe	Actions that prevent the release of airborne asbestos fibres associated with damaged or deteriorated ACM that ensures: ○ any exposed parts of the damaged or deteriorated ACM are sealed to prevent the release of fibres ○ the area of the damaged or deteriorated ACM is enclosed so that it cannot be accessed. It is not intended to cover maintenance (planned or unplanned) that is conducted to ensure assumed or confirmed ACM remains in a safe state, for example, reapplication of paint on ACM walls.
Officer in charge	The accountable person for a facility, as follows: • for a State school: ○ the principal ○ in the case of a principal's temporary absence – the person who is established under the Education (General Provisions) Regulation 2017 (Qld) as assuming the functions and responsibilities of the principal during the principal's absence. Note: it is intended that a principal would continue to be the accountable person for any short absence from the site provided the absence is not being managed under a record of appointment for the absence (for example, where the principal is away from the school and there is no need to formally appoint another person to the principal's role for the absence). for an institution that provides educational instruction to persons enrolled at State schools (such as environmental education centres and outdoor education centres) or any other facility – the person with day-to-day management responsibilities for the institution or facility.
OIC delegate	A person who has received authority, to act as a delegate for an OIC.
Preventative action	Steps taken to prevent the recurrence of similar incidents. A preventative action must have: • an assigned responsible party • be subject to consultation with key stakeholders • have a specific solution identified that has regard for the hierarchy of control have an agreed timeframe for implementation.
Quick assessment	A concise assessment of the facts of a health and safety incident. A quick assessment is undertaken with a view to quickly: • establishing key facts • drawing conclusions about what caused the incident • making recommendations about corrective actions • if required, identifying the need for a more detailed level of investigation. From these facts, the quick assessment should produce a description, based on relevant available information, of the incident, including what happened, where, how and why it happened, as well as make some recommendations for corrective and/or preventative actions.



Regulator	An agency that administers laws enacted in legislation. Regulators are responsible for inspecting workplaces, providing advice and help and handing out notices and penalties where necessary. The Regulator for work health and safety, in Queensland, is Workplace Health and Safety Queensland.
Safe work method statement	A document that addresses the information required by section 299(2) of the Work, Health and Safety Regulation 2011 (Qld) .
Standard investigation	An investigation conducted by a departmental health and safety investigator nominated by the Director, Infrastructure Safety. Unless negotiated otherwise, the investigator will be an employee of Infrastructure Services Division.
Stored materials	ACM materials that are being stored, for example, ACM wall sheets stored in the back of a storage shed.
Student proximity incident	Asbestos-related incidents for which: • restriction of access was required and students were in proximity of the impacted area before it was restricted, or • students handled a material suspected of containing asbestos. Students are considered to have been in proximity of an impacted area if they: • were in a room or other enclosed area where suspected asbestos containing dust or debris has been identified • have been involved in identifying material that is suspected by school personnel to be asbestos containing dust or debris or stored ACM, or are in the immediate area when damage to assumed or confirmed ACM occurs.
Suspected asbestos-related incident	An event suspected to involve asbestos but for which the asbestos register has not yet been checked to determine the likelihood that asbestos is involved.
Unauthorised asbestos work	Asbestos work that the department: • prohibits departmental employees from carrying out • has not authorised to be conducted.



APPENDIX A – GIRLS GRAMMAR ASBESTOS MANAGEMENT POSTER

ASBESTOS MANAGEMENT



Rockhampton Girls
Grammar School
Est 1892

Rockhampton Girls Grammar School

Officer in Charge (OIC)



Kara Krehlik

Principal

Officer in charge delegates

Persons who have been given a formal delegation of OIC responsibilities under the Asbestos management, asbestos incident and work area access permit process.



Kasey Mitchell

Facilities and Services Manager



Ryan Kimm

Grounds and Maintenance
Manager



Dr. John Fry

Deputy Principal (Studies)



Stacey McCarthy

Head of Boarding

Administrative support staff

Persons who have been trained in the systems used to manage asbestos at the facility and provide support to the OIC and OIC delegate/s.



Belinda Thorburn

Workplace Health and Safety &
Compliance Officer



Jennifer Hooper

Executive Support Officer