



# **Premises Management ASBESTOS POLICY**

Reviewed by: Trustees (Audit/Risk  
Committee)

Approved: June 2022

Next review date: June 2024

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## **1.0 Introduction**

### **1.1 What is asbestos?**

Asbestos is a naturally occurring fibrous mineral silicate. It was widely used between 1950 and 1980 though some types of asbestos continued to be used after this time. The use of all asbestos types was finally banned in 1999 and so any structures built from 2000 onwards should not contain asbestos containing materials (ACMs). It was used for many purposes in building construction such as noise and thermal insulation, and as a fire-resistant material due to its physical and chemical properties and low cost. Asbestos Containing Materials (ACMs) are therefore likely to be present in a large number of West Norfolk Academies Trust (WNAT) buildings. It was most widely used in:

- Ceiling and floor tiles and aertex finish,
- Equipment and vehicle parts,
- Spray coatings on steel work, concrete walls and ceilings,
- Insulation lagging on pipe work and boilers,
- Roof sheeting, gutters and pipes,
- Fire resisting structures such as fire doors (e.g. asbestos boards fixed to or sandwiched within doors) and wall partitions.

### **1.2 What are the dangers?**

Asbestos is the biggest single occupational health issue in the UK. Known ill health effects include:

- Asbestosis (irreversible scarring of the lungs)
- Asbestos related lung cancer
- Mesothelioma (cancer of the lining of the lungs or stomach)
- Pleural plaques (localised scarring and thickening of the pleura) and pleural thickening (extensive thickening of the pleura)

Breathing in air containing asbestos fibres may lead to the development of one of these asbestos related diseases. Asbestos fibres are so small they cannot be seen by the naked eye. Diseases resulting from exposure can take between 15 and 60 years to develop.

Exposure does not mean that disease will inevitably occur but as a safe threshold for these diseases has not been found, exposure should be avoided altogether. However, it is very unlikely that single or repeated low-level exposures will lead to asbestos related diseases. High exposures for long periods are more clearly linked to these diseases.

Wherever ACMs are located there is a potential for exposure if asbestos fibres are released. Fibre release is most likely to occur if ACMs are disturbed and/or damaged. The level of fibre release is dependent upon the type and composition of the ACM and the extent of any damage. Those most likely to be exposed to asbestos fibres are workers engaged in maintenance, decoration and repair work. Specifically, care must be taken when:

- Undertaking general construction and maintenance work
- Stripping out old insulation, removing internal walls, textured paints, plasters and ceiling tiles containing asbestos.
- Undertaking demolition and clearance of sites
- Routine installation, repair and maintenance work by plumbers, electricians, carpenters, caretakers and other trades people takes place
- Excavating contaminated ground
- Handling items in museum collections containing asbestos, including those used in school for pupil learning
- Installing IT networks

The responsibility to manage ACMs in an appropriate manner is a shared one. WNAT, through its management structure, has allocated specific responsibilities and functions to designated employees to manage and control the risk. Responsibilities also lie with contractors and others who may also work in or use our premises. This policy outlines the detail of all these responsibilities.

## **2.0 The requirement to manage asbestos**

Due to the health effects associated with asbestos, all work with ACMs is regulated and controlled. The primary objective is to manage asbestos risks in premises to prevent exposure or reduce it as far as is reasonably practicable. In order to do this there are specific requirements placed on WNAT and its employees. These are:

- Take reasonable steps to find materials likely to contain asbestos within our premises;
- Presume materials contain asbestos, unless there is strong evidence to suppose they do not;
- Assess the likelihood and the risk of anyone being exposed to asbestos from these materials
- Make a written record of the location and the condition of the ACMs (and presumed ACMs) and keep it up to date;
- Repair or remove any material that contains or is presumed to contain asbestos, if necessary, because of the likelihood of disturbance, and its location or condition;
- Prepare an asbestos management plan and put it into effect to ensure that:
  - Information on the location and condition of ACMs is given to people who may disturb them during work activities;
  - Any material known or presumed to contain asbestos is kept in a good state of repair;
- Monitor the condition of ACMs and presumed ACMs; and
- Review and monitor the action plan and any arrangements identified as necessary for its implementation
- Provide relevant training to those staff with a role in ensuring ACMs are properly managed

The definition of premises is a wide one and includes structures other than buildings such as roads, culverts and bridges.

The requirement to undertake an assessment of the risks also covers planned work involving asbestos. In such cases a risk assessment must be undertaken before the work commences. A plan of work must be produced detailing how the work is to be carried out and exposure to asbestos prevented or reduced to as low a level as is reasonably practicable.

**It is the policy of WNAT that employees will not knowingly undertake work with or on ACMs. Further details are provided in this document.**

### **3.0 Responsibilities to manage asbestos in WNAT premises**

#### **3.1 The West Norfolk Academies Trust**

WNAT is the employer for all schools and therefore the duty holder under the legislation.

#### **3.2 The Chief Executive**

The Chief Executive, as the officer in charge of WNAT, is ultimately responsible for ensuring the responsibilities of the duty holder are carried out through the management structure of the organisation.

#### **3.3 Director of Operations**

The Director of Operations has overall responsibility for ensuring arrangements are in place in their directorates/service areas for the effective management of asbestos. In particular they are responsible for ensuring that this policy is implemented and that appropriate training is provided for those with local responsibility for compliance.

#### **3.4 Head teachers or any other persons with management responsibility for a school**

- Undertake Asbestos Awareness training
- Ensure this policy is implemented in premises for which they have overall responsibility.
- Ensure that nominated premises managers are in place and ensure these managers receive the relevant training as outlined in this policy.
- Ensure that an appropriate asbestos management plan is produced and implemented.
- Ensure that all employees and occupiers of buildings they control are made aware of the findings of the asbestos register and the asbestos management plan, as well as the dangers of asbestos.

- Ensure that prior to any construction and redevelopment work, due consideration is given to whether the building should be occupied during the planned works. Serious reflection concerning the cost of not moving people (morale, well-being, increased project time etc.) must form part of this process. Notifying employees and any lettings users of any intended works which relate to possible disturbance of ACMs. The outcomes of such consideration must be documented as part of the project plan.
- Ensure the appropriate information regarding exposure to asbestos is kept on employee files and/or pupil records
- Ensure all such files/records are retained in line with current legislative requirements.
- Ensure that where employing staff whose function/role means there is the potential they might disturb hidden/unknown ACMs (e.g. during building maintenance/repairs, ICT installations etc):
  - Relevant staff have an appropriate level of knowledge and understanding of asbestos risks
  - An appropriate level of asbestos surveying takes place to detect any potentially hidden ACMs, prior to any invasive works beginning. See section 5 on surveying requirements
  - A competent person/contactor is commissioned to carry out additional surveys and any subsequent works that will impact on ACMs (having first considered whether this work can be done in a different way)
  - No work is carried out by school staff on known or presumed ACMs (including where hidden ACMs may be impacted upon)

In practice these responsibilities may be carried out through directing others within the management chain of their school. However, head teachers remain ultimately responsible for ensuring those persons with delegated responsibility carry out the requirements in full. The head teacher will therefore need to actively monitor that the required actions are being undertaken on their behalf.

### **3.5 Trust Estates Manager/School site managers/caretakers (where applicable) or any other person who is responsible for the management of premises**

- Undertake Asbestos Awareness Training
- Ensure that prior to any maintenance work, additions, modifications or invasive works commencing on the premises; consideration is given to whether a refurbishment and demolition survey is needed (see section 5 for further information on survey types).

- Provide, as necessary, all contractors with the details of the asbestos survey report prior to commencing work and ensure all contractors visiting the premises sign the form accompanying the register to confirm they have read and understood the contents. Contractors must also be reminded of their health and safety obligations to their own employees in relation to work activities involving material likely to contain asbestos.
- Produce an Asbestos Management Plan for the premises as detailed in section 6.
- Ensure that the Asbestos Management Plan is updated and appropriate action is taken following receipt or update of the asbestos register/risk assessment by a competent person/contractor. This will mean ensuring that where the need for:
  - i “protection and enclosure” for all risks from material;
  - ii “seal or encapsulate” for low risk material;
  - iii “restrict access” for all risks of material;
 has been identified, works are undertaken to comply with this.

This will also mean reviewing the risk assessment to ensure it reflects building use as outlines in section 5

- Ensure appropriate, effective monitoring systems and compliance checks for low and medium risk materials are in place, implemented and recorded to ensure that the remaining risks (as identified by you in your management plan) are being effectively managed:
  - i Medium risk material: quarterly inspections
  - ii Low risk materials: six monthly inspections
- Report to the Trust Estates Manager any deterioration in the condition asbestos material noted as a result of inspection .
- Ensure employees who use the premises are aware of the presence of ACMs and reporting procedure for concerns/issues.
- Monitor, as necessary, non-asbestos contractors to ensure they are not using methods that would compromise asbestos related safety.
- Ensure appropriate action is taken following discovery of damaged or suspected asbestos material as outlined in section 9.
- Where they become aware that contractors employed to undertake asbestos work (or any work, including that which might cause damage to ACMs) may be working in an unsafe manner they should **immediately** raise the issue with the contractor’s representative and inform the WNAT Director of Operations.

- When providing information on asbestos at the planning stage of contracted works, information must be given on any asbestos identified in access routes to the work location that could be affected (e.g. by accidental damage) as well as the actual work location.
- Notify the WNAT Trust Estates Manager of all proposals to undertake works that may involve ACMs so that advice can be sought as to the correct management process to take.
- Ensure appropriate statutory and documentary records are maintained as detailed in section 6.

### **3.6 Managers of premises where no asbestos has been identified**

Some premises built pre-1999 may have had an asbestos survey carried out that did not identify the presence of any ACMs. Similarly, some premises where ACMs were identified may have subsequently had these removed, either because they presented a high risk or because the opportunity arose to do so as part of a wider programme of works.

However, it is important to note that even if no ACMs were identified (and detailed in the asbestos register); this does **not** mean the building is guaranteed to be asbestos free. Therefore, unless managers have confirmation from the architect or builder that no ACMs were used in the construction of the building (and it can be confirmed none have been used in any subsequent repairs or modifications etc); they should presume that ACMs are present. In these cases, managers should:

- Undertake Asbestos Training
- Ensure that prior to any maintenance work, additions or modifications to the premises, appropriate checks are made to determine whether additional surveying is required and if so, that any findings are actioned. See section 5 for further information on asbestos surveys
- Seek advice about any material they are concerned about and if necessary arrange for reassurance sampling and testing to be undertaken.

### **3.7 All employees**

- Undertake Asbestos Awareness Training – where deemed to be required due to the nature of their role.



- Familiarise themselves with the location of ACMs in their establishment.
- Notify premises managers of any damage to known or suspected ACMs.
- Ensure that they are aware of the procedures to follow when contractors are working on the premises.
- Ensure that they are aware of the procedures to follow if they notice a change in condition of ACM or suspect an accidental release of asbestos (see section 7).
- Ensure they do not deliberately carry out any work or do anything to damage known or presumed ACMs or those that may be hidden within the fabric of the building
- Report any suspected unidentified ACMs to their line manager

### **3.8 Asbestos Contractors**

- Maintain their employee competencies in accordance with HSE requirements.
- Produce a plan of work and method statement in accordance with the legislative requirements and submit these to the premise's manager directly for agreement.
- Submit the statutory ASB5 notice and method statement to the HSE as soon as possible and at least 14 days prior to notifiable work commencing. Proof that this has been done and approval has been given must be supplied to WNAT.
- Take all reasonably practicable measures to ensure that work is carried out in line with the method statement.
- Provide all relevant records of work undertaken and tests completed to the premise's manager.
- If sub-contracting out any of the work under their contractual control, contractors are responsible for ensuring that any company they employ meets the requirements of the legislation and this policy.

### **3.9 All other contractors**

- Attend asbestos awareness training where their role is such that their work may disturb and/or cause damage to ACMs
- Prior to carrying out any works that might impact on known ACMs or potentially concealed ACMs, check that an appropriate level of asbestos survey has been carried out, including localised refurbishment and demolition (R&D) surveys where necessary

- Not to knowingly carry out work on ACMs that they are competent (and licensed where necessary) to perform
- If sub-contracting out any of the work under their contractual control, contractors are responsible for ensuring that any company they employ meets the requirements of the legislation and this policy.

### **3.10 Estates Manager**

- Undertake Asbestos Awareness Training
- Provide advice to managers and employees in support of this policy.
- Investigate incidents of exposure or potential exposure to asbestos in line with this policy including ensuring the HSE is notified of those persons affected by the incident.

## **4.0 Training**

Many of the responsibilities laid out above require a particular level of knowledge and training. WNAT will provide the following courses to assist competency levels to be achieved and maintained:

### **Asbestos awareness training**

All persons with responsibilities under this policy must complete the relevant training to ensure their competence to fulfil their role. In terms of premises management training a deputy/other person should also be trained to cover absences. In larger premises there should ideally be three or four people trained in premises management duties in total.

General employee awareness of the risks of asbestos and the procedures to follow are not provided for in specific training, but managers must provide this information to their employees through basic instruction and information during induction and general health and safety training.

Professional health and safety staff within WNAT must ensure their overall competencies are maintained. This must include all areas they are expected to provide advice on and monitor compliance for.

## **5.0 Asbestos Survey**

### **5.1 Key points relating to asbestos survey types and requirements**

The following key points relate to asbestos surveys and are expanded upon throughout section 5.

- Surveys need to be carried out of all premises to identify potential ACMs
- This can involve samples being taken and analysed or otherwise a presumption being made that ACMs are present
- There are two types of asbestos survey: Management (previously type 2) and Refurbishment and Demolition (previously type 3) surveys
- Management surveys are intended to assist with managing ACMs that might be impacted on during normal operation/occupation of the building
- R&D surveys (including localised invasive surveys) are required for this purpose and so their need should be considered prior to invasive works taking place
- A decision-making process to help with this should be applied and is outlined below
- WNAT will consider the need for additional surveying for projects they oversee with the potential to disturb hidden ACMs
- Asbestos survey findings need to be provided to contractors before works begin and contractors should not start work without first checking this has been done

Any Surveys undertaken after February 2010 are to be completed in accordance with HSG 264 'Asbestos: The Survey Guide'.

The survey will establish the location, form, type and condition of any ACMs with an evaluation of the likelihood of the material being damaged, disturbed or worked on in the future. The survey types noted in HSG 264 are:

## **5.2 Management survey (previously known as type 2 survey)**

A management survey is the standard survey and its purpose is to locate, as far as reasonably practicable, the presence and extent of any suspect ACMs which could be damaged or disturbed during normal occupancy (including foreseeable maintenance and installation activities) and to assess their condition.

**Due to their limitations, the contents of a management survey cannot be relied upon as confirmation that there are no ACMs hidden within the fabric of a building. This is particularly important when planning and undertaking invasive works. Cases do occasionally arise where concealed ACMs are damaged due to a management survey being inappropriately relied upon.**

Management surveys will often involve minor intrusive works and disturbance such as when taking samples of suspected ACMs for analysis. The extent of this intrusion will vary between premises e.g. the type of premises, nature of its construction, accessibility of all areas etc. The areas inspected should include: under floor coverings, above false ceilings (ceiling voids), lofts, inside risers, service ducts and lift shafts, basements, cellars, underground rooms, under crofts (this list is not exhaustive).

A management survey will include an assessment of the condition of the various ACMs identified and their ability to release fibres into the air if disturbed. This assessment will give a good initial guide to the priority for managing ACMs as it will identify the materials which will most readily release airborne fibres if they are disturbed.

The survey will usually involve sampling and analysis to confirm the presence - or absence - of ACMs. If sampling is not undertaken, suspected ACMs can be presumed as containing asbestos. Therefore, it is possible an asbestos survey may utilise a combination of sampling and presumptive methods; or either method on its own. Where it is not known for certain if a material is (or isn't) an ACM; it should be presumed and treated as being an ACM until confirmed otherwise. Any materials presumed to contain asbestos should also have their condition assessed.

### **5.3 Refurbishment and demolition (R&D) survey (previously known as type 3 survey)**

As described in 5.2, the information contained in a management survey report is gained from a largely non-invasive survey that is unlikely to have identified ACMs hidden within the construction of the building, or where access was difficult such as loft spaces.

A R&D survey on the other hand, is an invasive/destructive method of survey intended to identify materials hidden within the inner fabric of the building. The need for a R&D survey (this could be considered on a localised basis depending on the extent of the works) should be considered before maintenance, refurbishment, demolition or upgrade works are carried out that may lead to any unknown, concealed ACMs being damaged.

It is important to note that many asbestos releases occur because invasive works are carried out without an appropriate level of survey having been first undertaken. Such works are often large scale e.g. the demolition of an entire building, extensive re-cabling works or the removal of large fixed structures or plant. Equally though, they can in some instances include routine, minor works such as drilling into structures where the management survey hasn't been invasive and so, for example, hasn't accessed behind superficial materials such as fascia's and panelling.

### **5.4 Process for considering whether additional surveying is necessary**

Where works are being overseen by WNAT, they will determine whether additional surveying is necessary and ensure this is commissioned.

Though information on the presence of ACMs needs to be made available to contractors, they must not undertake invasive works without first satisfying themselves an appropriate survey has been carried out and that there is no risk of their work disturbing hidden ACMs.

In most instances, the need for additional surveying for larger works will be obvious. This may not be the case though for less significant but still invasive works and so the following process is provided to help determine whether additional surveying is needed.

You must be able to demonstrate before allowing any invasive works to take place, that the process/points below have been considered and so your risk assessment should document the findings from the below.

1. Establish whether the building (or the parts of the building to be worked on) was constructed after 1999. The use of all asbestos types was finally banned in 1999 and so any structures built from 2000 onwards should not contain ACMs.

Therefore, it would be safe for the work to go ahead.

If constructed before 2000 then ;

2. Establish if the work is to be carried out to known non-ACMs (such as brick, wood, UPVC, metal, breeze blocks, concrete, glass, natural stone etc) and if so, that it also wouldn't affect any possible underlying, unknown ACMs (e.g. four-inch holes aren't being drilled through a one-inch wood panel and into unknown materials behind). If work is taking place on a known non-ACM, it would be safe not to carry out any further invasive survey;
3. Check the site management survey (contained in the asbestos register) as these will often contain information on materials that were tested and confirmed as non-ACMs. Note though; even if ACMs are not identified (or were tested and found not to be ACMs), you will still need to consider whether there is the potential for unknown, underlying ACM's to be damaged (as discussed in 2)
4. Review other information that may be available.
5. If you cannot be certain ACMs won't be impacted upon; consider whether the work you are planning can be done differently to reduce the risk of damaging underlying materials e.g. surface mounting cables into a known non-ACM instead of drilling/chasing through it and into unknown structures behind. If the work cannot be undertaken differently and;
6. If from the information gathered in the above steps you cannot be certain there are no concealed or unidentified ACMs in the area where the work is to take place; an additional, generally localised, invasive survey must be arranged. Alternatively; presume that the work may disturb hidden ACMs and apply the safe working methods outlined by the HSE. **Note though; it is WNAT's policy that staff should not carry out work on known or presumed ACMs**

For major works, comprehensive (i.e. not localised) R&D surveys will be needed to locate all the asbestos in the building (or the relevant parts) to which the works are taking place, as far as reasonably practicable. It will be a disruptive and fully intrusive survey which may need to penetrate all parts of the building structure. Aggressive inspection techniques will be needed to lift carpets and tiles, break through walls, ceilings, cladding and partitions, and open up floors.

**If the specified works change at any point in the project a new survey must be commissioned for the new areas before any work in these locations takes place. This will also apply if any further works take place in different areas in the future. If any areas not covered by the survey are inadvertently damaged, work must stop until a survey is carried out for reassurance purposes.**

It is important that you allow for additional R&D surveys to be undertaken as necessary within your project plan and budget for these. The asbestos register should be updated with the findings

of any additional surveying. The person commissioning the survey should ensure this happens by providing a copy of the report to the premise's manager.

## 5.5 Asbestos Survey Report

A competent person/contractor has carried out management surveys as described above in all WNAT premises and created asbestos survey reports. These reports (asbestos registers) include an asbestos plan and photographs, a list of the materials found, descriptions of the material (their type, location and condition), a risk assessment and priority identification.

It also identifies the remedial action necessary to deal with any asbestos present as follows:

- **Monitor and Manage** - Leave the ACMs in place, monitor and record condition at intervals not exceeding 12 months. Review action where deterioration or damage occurs.
- **Protect or Enclose** - Construct or place physical barrier to prevent damage to the ACM. If the works to provide the enclosure are liable to disturb the asbestos then a licensed asbestos removal contractor should carry out the work.
- **Seal or Encapsulate** - Seal surface of the ACM with a durable and flexible coating designed to give the ACM additional strength and prevent fibre release from surface of material. Suitable for ACMs that are presently unsealed and in reasonable condition. Not appropriate where material will be subject to impact damage and work in virtually all cases should be carried out by a licensed contractor.
- **Repair** - Suitable where damage is slight and repair is restricted to patching or making good small areas of material. A licensed contractor should generally undertake this work.
- **Remove** - Where ACMs are not in good condition or are in a vulnerable position and liable to damage and it is not practicable to protect, seal or repair. Remove also in areas due for refurbishment, alterations or demolition. A licensed contractor should generally undertake this work.
- **Restrict Access** - Where it is not possible to immediately repair or remove damaged asbestos and persons are likely to be exposed to asbestos fibres in the air. Restrict access to these spaces to persons with appropriate protective equipment.

The competent person/contractor will update the survey report in the register each time the property or ACM is inspected or work involving ACMs is undertaken by them or anyone contracted by them.

Premises managers must ensure the recommended actions are undertaken as identified in the survey report. This would include progressing any remedial works required.

The asbestos survey report must be consulted before any property maintenance, repairs, cable/IT installation, alteration, refurbishment or other similar works that may impact on ACMs; are carried out. Therefore, premises managers must ensure contractors are informed of the contents of the survey report whenever undertaking work at a premise. They must ensure contractors sign the register to say they have seen it. **5.2 and 5.3 discussed the limitations of a management survey and when additional refurbishment and demolition (invasive) surveys may be needed.**

There are strict requirements placed on work with ACMs which vary depending on the ACM type and the work being carried out. It is the policy of WNAT that employees will not knowingly undertake work with or on known or presumed ACMs. Therefore, employees must be aware of the above and act accordingly.

The hard copy of the survey must be kept in a secure place where it can be accessed by anyone who may need the information it contains. It is recommended that reception be a suitable location. This includes employees and other persons that occupy our buildings. All persons who need to understand the contents of the documents must be made aware of the document's existence and location.

## **6.0 Asbestos Management Plan**

Premises Managers must produce a local asbestos management plan setting out how the ACMs identified in their asbestos report will be managed. You must make certain that the plan is easy to find when you, or anyone else, need it, and that you record local monitoring of the condition of asbestos materials (i.e. six monthly or quarterly inspections by staff on site and annually) within it. WNAT current maintain online copies of the Asbestos Management Plan within the Estates Management System relevant to each school. Copies of the plan can be obtained from the Premise Manager, Site Manager or Trust Estates Manager when required.

The plan should include:

- Details of persons responsible for managing asbestos on the premises (names and positions)
- The most recent asbestos survey
- Plans/schedules for ensuring the recommended actions are undertaken e.g. removal, encapsulation etc
- The schedule for monitoring the condition of low and medium risk materials
  - Low risk – six monthly
  - Medium risk - quarterly
- Proof that you have considered whether materials identified in the survey report present a higher risk than that assessed by the competent person/contractor.
- Procedures to monitor and review the plan and the arrangements to act on it so that the plan remains relevant and up-to-date

- Details of how premises employees and others affected will be instructed regarding ACMs on site and their role in the management of it

You must:

- Take the necessary steps to put the plan into action
- Tell people about your decisions

\*When developing your plan, you may consider that ACMs identified (in the asbestos survey) as needing to be 'monitored and managed', pose a higher risk than identified. For example; if ACMs are located in a school where it may be susceptible to damage by children. The HSE's 'Material and Priority Scoring Tool', available in section 6 of the HSE microsite 'Managing my Asbestos: a step by step guide to the duty to manage asbestos', can assist with this process. Any outcomes from this process that differ from the assessment provided by the competent person/contractor should be raised with them and the Trust Facilities Manager.

Premises managers should also maintain an asbestos document file located within the online Estate Management System relevant to each school:-

- A record of all asbestos surveys affecting the building
- Copies of all written advice given in response to enquiries
- Copies of all advice received from asbestos consultants
- Details of all work carried out on ACMs
- Copies of all incident reports relating to possible or actual asbestos exposure (including official notifications to the Health and Safety Executive)
- The current asbestos register and all amendments to it
- Details of inspections of ACMs (six monthly or quarterly by staff on site and Annually)
- All method statements for work on ACMs
- All risk assessments for work on ACMs
- All air monitoring reports
- All special waste disposal certificates
- All audit records

## 7.0 Labelling of ACMs

Careful consideration must be given to labelling ACMs. Most people are aware of the dangers of asbestos but are not necessarily aware that when in good condition and handled properly it is not a danger to health. Therefore, labelling of ACM may cause undue concern and worry.

Persons in control of premises must consider the following points when deciding whether to label ACMs or not:

- Asbestos in public areas **should not** generally be labelled.
- If labelling could result in damage by vandals it **should not** be carried out.
- If labelling would mean vast areas of the structure would be labelled due to the amount of asbestos in a site it **should not** be carried out.



- Labels should be used where contractors or maintenance personnel have unsupervised access to remote areas containing asbestos

If in doubt consult the WNAT Trust Estates Manager.

Where used the labels used will be in the following format:



They will include a description of the location of the asbestos depending on the circumstances, for example:

**WARNING – ASBESTOS CONTAINING MATERIAL**

**WARNING – AREA CONTAINS ASBESTOS CONTAINING MATERIALS.  
SEE ASBESTOS REGISTER FOR FURTHER DETAILS**

Older asbestos labels will sometimes have a white 'a' on a black background. These do not need to be replaced by new labels.

## **8.0 Working with ACMs**

### **WNAT staff**

It is WNAT's policy that staff will not work on known or presumed ACMs. Work must only be carried out by contractors approved to do so.

### **Contractors**

The majority of work on ACMs must be carried out by specialist asbestos contractors, licensed by the HSE. Even where a licensed contractor is not needed, the contractor should nevertheless be required to demonstrate their competence in the field of work and the safe working methods they will be adhering to.

The responsibility for choosing/approving a suitable contractor and the working methods to be employed will reside with the service project team/lead overseeing the works. Therefore, it is important to be able to demonstrate how this process was undertaken.

Responsibilities of the project lead/team will also include ensuring requirements for additional surveying have been considered and the results (where additional surveying is undertaken) have been provided to – and acknowledged by – the contractor in advance of the work beginning.

Most work with asbestos also needs to be notified to the HSE and responsibility for ensuring this happens also falls to the project team/site manager.

Further information on notifiable/non-notifiable works and when licensed contractors must be used can be obtained from the WNAT Estates Manager. It is essential these requirements are given due consideration prior to awarding any asbestos related works.

## **9.0 Action in the event of damage or exposure to an ACM**

When an ACM or a suspected ACM is found or damaged during the course of **any** work, (other than planned work being carried out by a licensed asbestos contractor in a sealed enclosure), the following steps must be taken:

- **Stop work immediately**
- **Do not attempt to clear up suspected debris. Doing so may spread fibres further e.g. by seeping or vacuuming using a normal vacuum**
- **Secure the area to prevent further damage and access to the area by anyone. Consider also any adjoining areas that debris may have spread to**
- **Turn off any ventilation equipment that might enable fibres to be transferred between parts of the building**
- **Do not attempt to remove contaminated equipment from the room**
- **Lightly contaminated clothing should be gently wiped with damp rags and the rags carefully placed and sealed into a plastic (polythene if available) bag to await proper disposal**
- **Contact the Health, Safety and Well-being team for instructions and inform the person in control of the premises and your Service Head of the situation.**
- **Work is not to resume unless a health and safety adviser has informed you it is safe to do so**

**Additionally, there is a Flowchart 'ACTION TO BE TAKEN IN THE EVENT OF FINDING ASBESTOS WHEN WORKING ON PLANT, EQUIPMENT OR PREMISES' to assist managers in making informed decisions located at Annex A to this document.**

A written record of the event must be made and kept in the Asbestos Management Plan. Where employees have been exposed, this record must include a reference to affected person(s) personal file(s) but a list of the persons affected should not be kept in the plan, as this is confidential information. However, the record must make it clear if employees were exposed and notified as such.

The WANT Estates Manager will:

- Monitor that the appropriate action has been taken.
- Determine whether further advice is needed.
- Determine whether the incident needs to be reported to the HSE and, if it does, ensure that a report is made.

- Keep a record of the incident and carry out any necessary investigation into the cause, in conjunction with a competent person or contractor.
- Co-ordinate the provision of information to staff and others that may have been affected.
- Inform WNAT's Communications team where appropriate
- Where appropriate, visit the site as soon as possible to provide reassurance and advice to members of staff affected.
- Where appropriate, refer to and instigate the health and safety major incident procedure.

**All parties involved are responsible for ensuring the business continuity plan for the building is instigated and adhered to.**

## **10.0 Notifying those potentially exposed to asbestos**

### **10.1 Deciding whether to notify individuals and the HSE**

For each asbestos release and potential exposure occurring; careful consideration will be given as to whether individuals potentially exposed, and/or the HSE, need to be informed. This will require careful consideration of the information gathered following the release such as: details of the ACM type, the extent of the damage caused, how it was caused, the likely duration of the exposure and the results of any air sampling and/or analysis undertaken following the incident.

Where air sampling is undertaken, the results will be compared against the clearance limit of <0.01f/ml (which is the lowest detectable level). However, in some situations it may not be possible to ascertain whether the clearance limit would have been/was exceeded. An example might be when a likely asbestos release only comes to light at a later date (the HSW team hadn't been made aware of) and so for which air sampling was not organised. In these instances, where information exists on typical asbestos levels arising from similar activities/releases; it may be possible to use this information in arriving at a decision about a possible exposure.

### **10.2 Information to employees following a potential asbestos exposure**

Where an employee needs to be notified of a potential exposure to asbestos fibres, this will be carried out in writing. This process will be led by the relevant health and safety adviser who has pro-forma information that they will tailor to the specific event. In some circumstances it may be appropriate to refer employees to an Occupational Health Adviser, so that the medical issues can be fully discussed and any anxieties allayed. Line managers should discuss this option with the Estates Manager and Human Resources.

### **10.3 Information to non-employees following a potential exposure to asbestos**

Where a third party needs to be notified of a potential exposure to asbestos fibres, they should be notified as follows:

- **School pupils**

Where a pupil has been potentially exposed to asbestos, their parent or guardian should be notified of the potential exposure in writing. Pro-forma information will be tailored so it is specific to the event and provided by the health and safety adviser for distribution. The letter will direct them to discuss their potential exposure with the child's GP

- **Contractors**

Where a contractor has been potentially exposed to asbestos, the employing organisation should be advised of this and asked to inform their staff. The letter provided to WNAT staff will also be provided to the employing organisation for information, along with the advice that they should have arrangements in place for keeping a copy of this letter on their employee's employee record

- **Other members of the public**

It may not be possible to identify all members of the public potentially exposed to asbestos, particularly if there is a significant turnover of visitors who do not sign in and out. However, if an asbestos release incident occurs while members of the public are accessing the affected area or you become aware of damage having been caused to ACMs at some point; you should attempt to record the details (names and addresses) of those present so they can be contacted at a later date if necessary

#### **10.4 Incident report forms and investigations**

Asbestos release incidents should be recorded on the WNAT incident report form located within the WNAT First Aid Policy. In addition, a detailed incident investigation may also need to be carried out depending on the nature and extent of the release. To determine whether this more detailed investigation is required, it is important the Estates Manager is notified of asbestos incidents as soon as they occur.

Details (name, address of all individuals and whether they are employees, pupils, contractors or other) of all those known to have been potentially exposed following an asbestos release should be recorded as part of the incident investigation.

#### **10.5 Keeping records of potential exposures**

- **Staff**

Incidents of potential exposure to asbestos should be kept on the staff record of the individual concerned (e.g. a copy of the letter sent to the individual and the incident report form). The Headteacher should ensure this happens.

- **School pupils**

Incidents of potential exposure to asbestos should be kept on the child's school record (e.g. a copy of the letter sent to the individual's parent or guardian and the incident report form) and a note made on the record to this effect.

## **10.6 Retention periods for asbestos exposure and incident investigation records**

Due to the potentially long period between asbestos exposure and the possible onset of ill health; records relating to an exposure should be kept for at least 40 years following the incident (though note the longer period for pupils discussed below). Therefore, arrangements for ensuring this happens need to be in place and make provision for:

- Transferring relevant records when a building is closed (no longer used)
- Ensuring relevant records are kept even where an exposed individual later transfer to a new post within the authority or leaves the authority altogether
- Ensuring records are kept for exposed pupils even when this means retaining the child's school record past the date when ordinarily it would be disposed of. In instances where children have been potentially exposed the record should be kept for 65 years past the date of birth. This reflects the addition of the 40-year asbestos retention period to the normal incident report retention period for pupil incidents which is date of birth plus 25 years

## Annex A

### ACTION TO BE TAKEN IN THE EVENT OF FINDING ASBESTOS WHEN WORKING ON PLANT, EQUIPMENT OR PREMISES.

