



Asbestos Policy

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1.0 Introduction

This policy describes the arrangements that the Delta Academies Trust (referred to as “Delta” or “the Trust”) has in place to manage the potential health risks from Asbestos Containing Materials (ACMs) present in the Trust’s buildings. The aim of these arrangements is to eliminate or reduce exposure to airborne asbestos fibres to the lowest level reasonably practicable for all persons who work in, or otherwise use the Trust’s buildings. It builds on existing control measures to meet the new requirements introduced with the Control of Asbestos Regulations 2012.

The instructions given in this document explain how Delta complies with the Control of Asbestos Regulations 2012 and forms the Delta Asbestos Management Policy.

Duty to manage asbestos

As the Trust are owners and occupiers of non-domestic premises and have maintenance and repair responsibilities for those premises, there is a duty to assess them for the presence and conditions of ACMs.

This duty is undertaken by each Academy and is overseen by the Principal with assistance from the Health and Safety Coordinator.

Where ACMs are present the academy must ensure that the risk is assessed; that written plans identifying where ACMs are located are prepared and that measures to manage the risks are set out in the policy and implemented.

Duties of Academies

Each Academy will:

- Comply with the Asbestos Management Policy;
- Produce and maintain an Asbestos Register for each property;
- Produce a priority risk assessment for each property which will enable Delta to rank the asbestos risk for each property;
- Arrange for twice yearly inspections to assess the on-going condition of the ACMs and to update, where necessary, the Asbestos Register;
- Project-manage all asbestos related work on Academy properties. This includes liaising with contractors to be satisfied of their competence to undertake asbestos related works, agree plans of work, method statements and risk assessment;
- Provide Asbestos Awareness Training to Academy employees whose work could foreseeably expose them to asbestos.

Definitions

CAWR – the Control of Asbestos Regulations 2012.

ACMs – Asbestos Containing Materials; any substance or material that contains asbestos.

Persons – within each Academy, this includes tradesmen, contractors, sub-contractors, and other persons who are likely to work on buildings. Other Academy employees and the contractors they control may also fall within this group.

Buildings – includes the fabric of the building, its roof and exterior walls, ceilings, interior walls and panels, flooring materials, services, vessels and pipe-work (e.g. Boilers), ductwork (e.g. Air

handling systems), equipment and appliances in workshops, laboratories, plant rooms, water tanks, lift shafts and plant, and domestic appliances. This is not an exhaustive list.

Licensed Asbestos Removal Contractor (LARC) – a contractor licensed by the Health & Safety Executive under the Asbestos (Licensing) Regulations 1998 and normally a member of the Insulation and Environment Training Agency (IETA), or the Asbestos Control and Abatement Division (ACAD) Division of Thermal Insulation Contracts Association (TICA).

Health Risk – the risk of developing fatal asbestos related diseases is understood to increase with total lifetime dose of inhaled fibres. The dose of total inhaled asbestos fibres is a combination of the concentration of fibres in air and length of time a person is exposed, together with the number of occasions when that person is exposed.

2.0 Policy Statement

The overall policy for the management of asbestos can be summarised as follows:

- To have specific lines of responsibility for the management of asbestos in buildings
- To have clear comprehensive procedures for the management of asbestos in buildings. This will include the following:
 - Identification of ACMs, monitoring of their condition, and their containment, removal or repair where necessary.
 - The planning and effective implementation of emergency procedures.
 - The identification of and provision of information to all maintenance staff, specialist staff, contractors or any other person whose work may involve the disturbance of ACMs.
 - To identify, where possible, the presence of asbestos in buildings and carry out assessments to determine the risks presented by the asbestos containing materials (ACMs).
 - To maintain up to date records of asbestos containing materials within the buildings. These records to be kept centrally with a written and /or electronic copy provided for each site.
 - To remove asbestos where it presents an unacceptable risk to any person.
 - Where asbestos containing materials are not removed, they should be maintained in a safe condition so as to present minimum risk to building users.
 - To ensure that staff are trained and check that contractors have the requisite training, as appropriate, in matters relating to asbestos.
 - To only use licensed asbestos contractors who are approved for asbestos removal work.
 - To carry out suitable audits and monitoring of the licensed asbestos contractors to ensure that the work is carried out in accordance with current legislation.
 - To use a laboratory to carry out air sampling and analysis that is UKAS accredited to ISO17025 and other suitable qualified specialists.
 - To carry out an annual review of the policy and procedures to monitor their effectiveness and identify any areas where improvements as necessary.
 - To ensure that, where buildings are leased, landlords provide a comprehensive asbestos register or, for areas where the Academy is responsible, that a relevant survey is carried out.

3.0 Legislation

The Health & Safety at Work Act 1974 and associated legislation
 The Management of Health and Safety at Work Regulations 1999
 Control of Asbestos Regulations 2012
 Asbestos (Prohibitions) (Amendment) Regulations 1999

4.0 Procedures

4.1 Managing people who work on existing building fabric, services, plant or equipment

When a new building is acquired by Delta or Academy a Management Survey will be carried out. This will be commissioned by the Academy. The survey report should be in a format, and of a quality, that matches the surveys in the academy's existing Asbestos Register and the report must be uploaded to Every.

Before work starts on any Academy building, its fabric, services, plant or equipment, it is the responsibility of the Principal and Health and Safety Coordinator that all persons directly involved, whether operative, supervisor or manager, or contractor must:

- Attend Asbestos Awareness Training on an annual basis to ensure that they are familiar with what asbestos is, where it can be found in buildings, what health hazards it presents and what employers have to do to control exposure to it;
- Contractors must have membership of the Asbestos Aware Contractors Scheme (AACS), or an equivalent commitment to training;
- Have read and understand Delta's policy on controlling exposure to asbestos;
- Be given access to and consult survey information on ACMs contained in the Asbestos Register. This must be signed for on each occasion by the relevant member of staff or contractor.

4.2.1 Looking for existing information on ACMS

When a project or maintenance work is planned, the first step is to establish what information on ACMs is held for the areas in which persons will be working.

Employees should then refer to the information in the Asbestos Register for details of its exact location and extent, product type, material condition and asbestos type. This is available on SharePoint and also contained in written form, with photographs and marked floor plans also.

From the information in the Asbestos Register, the Health and Safety Coordinator must decide if there are ACMs within the area in which the work will be carried out or not, bearing in mind that the scope of the work may move beyond the room or area originally planned. If necessary advice should be sought from the Health and Safety Consultant.

Where work is being carried out by other departments of the Trust for example, ICT, they must first establish whether ACMs have been identified in that area. The first step is to consult the Asbestos Register for the particular building and sign the register to acknowledge an understanding of the information contained in this.

4.3 Work in areas where ACMs have been identified.

For further information on working in areas where ACM's have been identified, please see Appendix A

4.4 Updating information on Asbestos

In order to carry out work on Delta buildings without exposing people to asbestos fibres, it is important that Delta information on ACMs on Every and the Asbestos Register is kept accurate and up-to-date, as information changes when known ACMs are removed or new ACMs are found. This means that, with a few potential exceptions, employees and contractors will know where ACMs are located and can then take action to avoid them.

All Delta buildings should have been surveyed and the survey reports form the Asbestos Register. Any demolition or dismantling work will normally require a Refurbishment and Demolition Survey to be carried out to ensure that ACMs that may be hidden beneath the surface of building fabric, or within plant or equipment, for example, are not disturbed.

Since January 2010 the Health & Safety Executive's standards for surveying, sampling and assessment of ACMs is now set down in HSG 264 Asbestos: The Survey Guide, which explains the different types of survey and where they should be used, among other matters. You can request a copy of this from the Health and Safety Consultant.

Updating information on Every and the Asbestos Register will start with either a Management or Refurbishment and Demolition Survey, a bulk sample of suspect material, a clearance certificate or certificate of re-occupation, depending on whether the building or part of it is being surveyed for ACMs, or known ACMs are being removed;

The Project Officer will normally issue a certificate of practical completion at the end of the project, and pass the project drawings to the academy,

The information on file will fall into one of three categories:

- Known ACMs that have been removed to allow the works to proceed;
- ACMs discovered during the works and removed;
- ACMs discovered during the works and left in place.

The Health and Safety Coordinator will use this information to update the pdf drawings in the main Asbestos Register. This will be done by marking the presence of new ACMs on the floor plan in red ink (unless ACMs have been removed) and typing a note with a cross reference to the relevant Consultant Analysts report. The Health and Safety Coordinator will then issue the updated information to the Trust Facilities Officer to update their records.

4.5 Emergency response when ACMs are damaged.

This section deals with how employees and contractors should respond when they damage ACMs during the course of their work. The aim here is to avoid exposure to airborne fibres and minimise contamination of the area until a licenced asbestos removal contractor can be called to clean up any debris.

- All persons in the area must stop work immediately and the area closed to access;
- Other people should be prevented from entering the area;
- If any person has got dust or debris on their clothing or overalls, they should remove these and place them in a plastic bag, find facilities to wash or shower as soon as possible, and leave the shower/washroom in a clean state;
- The incident must to be reported immediately to the Academy Principal, the Trust Facilities Manager and the Health and Safety Consultant
- The Health and Safety Coordinator will arrange for a bulk sample to be taken of the damaged ACM;

- If the bulk sample confirms that the material does contain asbestos, then a licensed asbestos removal contractor will be contacted by the Health and Safety Coordinator, to repair it or remove it, together with any debris. This work will be supervised by an independent asbestos analyst and a certificate of re-occupation obtained prior to work recommencing;
- The information will then be sent to the Trust Facilities Manager and administrative staff to update the Asbestos Register and Every.

4.6 Out of hour's arrangements – Emergency

Where asbestos is disturbed out of hours, the Health and Safety Consultant/Delta Facilities Manager should be informed immediately.

5.0 Responsibilities

5.1 Principal

- Shall have overall responsibility for ensuring compliance with Asbestos Legislation.
- Shall ensure that adequate resources are made available to implement the policy.
- Under CAWR will be the Duty Holder who will be responsible for managing the arrangements made under this policy.

5.2 Academy Leadership Team

- Shall ensure the effective implementation of the Asbestos policy in their area of responsibility.
- Shall ensure that all activities and sites within their responsibility are subject to an asbestos survey where required.
- Shall ensure that all relevant employees receive appropriate asbestos awareness training both at induction and through regular update sessions.

5.3 Health and Safety Coordinator/ Facilities Managers/Site Superintendent

- Shall liaise as necessary with contractors to provide and obtain asbestos information.
- Shall ensure that asbestos assessments are carried out for all relevant areas.
- Shall supervise contractors in relation to their managing asbestos and enforce safe working practices.
- Will oversee ALL work relating to the identification, repair or removal of any ACM and will ensure the quality and integrity of the method statement and risk assessments associated with each job and thereafter the recorded information on Every and the Asbestos Register.
- Shall liaise as necessary on asbestos implications for construction and refurbishment projects with architects, building control and contractors.
- Shall arrange for asbestos awareness training where necessary.
- Will be suitably trained in asbestos awareness.

5.4 Employees

- All employees shall be responsible for becoming familiar with the relevant contents of this Asbestos Policy and the day to day observation of work at height safety.
- All employees who have to work in areas that may contain asbestos shall be responsible for becoming familiar with the contents of any asbestos risk assessment that concerns them.
- All employees shall be responsible for ensuring that they attend asbestos training.
- All employees should be responsible for reporting unsafe asbestos procedures if observed.

- Employees must report any damage to asbestos they observe.
- Every person who works at Delta is expected to approach their work with caution, and follow the arrangements in this policy where necessary.
- Persons who carry out work on Delta’s buildings must follow the arrangements in this policy.

5.5 Contractors

- Contractors and any other persons who work at Delta premises should co-operate with the Academy by complying with this plan.

5.6 Students

- Students must not interfere with any asbestos.
- Students must report any damage to asbestos they observe.

6.0 Training

Delta recognises that training is required for staff to acquire awareness of asbestos dangers. All Delta staff who work with asbestos will receive asbestos awareness training and records will be kept of attendance.

7.0 Reference / Guidance

The Control of Asbestos Regulations (CAWR) 2012

The Management of asbestos in non-domestic premises, Approved Code of Practice and Guidance, L127 (HSE)

HSG 264: Asbestos the Survey Guide.

HSG 210: Asbestos Essentials: A Task Manual for Building, Maintenance and Allied Trades of Non-Licensed Asbestos Work.

8.0 Appendices

Appendix A

Working in areas where ACMs have been identified

- If ACMs are identified within the work area, the Health and Safety Coordinator must decide if the work they plan to carry out is likely to disturb the ACMs, and what action they need to take to avoid exposing anyone to airborne asbestos fibres, if any. If necessary advice should be sought from the Health and Safety Consultant;
- Where ACMs can be left undisturbed by the work, the Health and Safety Coordinator is to monitor that they remain undisturbed as the work progresses;
- If there is a risk of ACMs being disturbed by the proposed work, the person in charge of the job must consult with the Health and Safety Coordinator who will carry out an assessment. This may involve its removal or encapsulation. Where licensed removal work is necessary it must be carried out by a licensed asbestos removal contractor under the direct supervision of an independent qualified asbestos analyst;
- Once the ACMs have been removed or encapsulated, the main works can then proceed;

- When removal of the ACM is completed, a completed Hazardous Waste Transfer Note must be received from the removal contractor and forwarded to Delta. This will be retained for a minimum of 3 years;
- The Health and Safety Coordinator must ensure that the Asbestos Register and Every are updated to show the extent of removal of ACMs;
- When work involves dismantling or demolition of part of the building, its fabric, services, plant or equipment, a Refurbishment and Demolition Asbestos Survey (see HSE's HSG 264 Asbestos: The Survey Guide) must be commissioned before any work commences.

Appendix B

Working in areas where no ACMs have been identified

- Where no ACMs have been identified in the survey, but dismantling or demolition of part of the building, its fabric, services, plant or equipment is involved, a Refurbishment and Demolition Survey (see HSE's HSG 264 Asbestos: The Survey Guide) should be commissioned unless there is good reason not to do so. This should be documented for reference. "No work that would involve dismantling or demolitions of part of the building shall commence until the report has been issued to all parties and fully understood";
- If this Refurbishment and Demolition Survey discovers ACMs, follow the procedure in Appendix A - Work in areas where ACMs have been identified
- If this Refurbishment and Demolition Survey does not find ACMs, all persons involved in the works must proceed with caution, using their asbestos awareness training as a guide;
- If ACMs are disturbed during the works, then persons must stop work and, if necessary, follow the emergency response procedure identified in Section 4.6.
- After the area has been cleaned, the Health and Safety Coordinator must ensure that the Asbestos Register and Every are updated to show the extent of removal of ACMs.

Appendix C

Managing ACMS

- Managing ACMs under the Regulations means assessing the risks of exposure, deciding on the correct action to take to avoid this, and monitoring the condition of ACMs while they remain in place. Monitoring is intended to avoid the risk of exposure to airborne fibres released from ACMs that have been left in place because they were initially assessed as low risk but which subsequently deteriorate or are damaged.
- The first stage of this procedure involves giving each identified ACM a risk assessment score, as a basis for deciding what action needs to be taken to control exposure. From this, the ACM in question can be repaired, removed, or monitored to ensure it remains in good condition. To do this:
 - Priority Assessments will be completed for all known ACMs using a scoring method based on the algorithm in Appendix 4 HSG 264 Asbestos: The Survey Guide;
 - The Material Assessment and Priority Assessment scores will be added together for each known ACM to produce a Risk Assessment score. Assessments should be recorded on Every;
 - At regular intervals, the Delta Facilities Officer will monitor Every for all ACMs present in Delta buildings, ranked by their Risk Assessment score;

- Where appropriate and working from the highest scores down, a risk based report will be produced by Delta to allow a decision to be made in the case of each ACM listed, whether:
 - i) No action is required;
 - ii) Protection or enclosure is required;
 - iii) Sealing or encapsulation is required;
 - iv) Repair is required;
 - v) Removal is required.
- The Health and Safety Coordinator for each Academy will draw up a list of all known ACMs allocated to each one of these five categories and arrange for the actions to be carried out as necessary for every ACM under categories (ii) to (v) above.

Monitoring actions (categories (i) to (v) above)

- The inspection frequency for ACMs or groups of ACMs will be carried out half yearly; OR following significant changes to the use of the premises which may impact on identified ACMs;
- Trained Maintenance staff will also carry out monitoring of ACMs by means of a visual inspection and report any defects or concerns to the Health and Safety Coordinator;
- If an ACM shows signs of damage, a new decision will be made on the remedial work required (see (iv) above);
- The Health and Safety Coordinator will ensure this information is recorded on Every.

Remedial work (categories (ii) to (v) above)

- Where licensed remedial work is required, the Academy Health and Safety Coordinator must be consulted to oversee that a licensed asbestos removal contractor or other suitably qualified person is selected to do the work;
- Working methods must meet general requirements for asbestos removal work requiring a licence, and as a minimum standard the methods described in the task guidance sheets listed in HSG 210, the Asbestos Essentials Task Manual;
- Once this work has been done, details will be passed to the Health and Safety Coordinator to update the Asbestos Register and Every. This will be monitored by the Facilities Officer;
- If the removal is urgent, if necessary, follow the emergency response procedure identified in Section 4.5;
- In each case, where some action needs to be taken to prevent exposure because the ACMs condition has deteriorated, removal or repair action must be indicated, and the list of ACMs that require action passed to the Delta Facilities Management Team for inclusion in a repair/removal programme.