

Asbestos Management Policy

March 2021

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Document Control

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RD013	1.2	Published	Nic Carstens Head of Health, Safety & Wellbeing	
Amendments			Date	By whom
Policy reviewed; Updated and removed original release timescales, review of roles and responsibilities, no material changes made.			01/03/2021	Nic Carstens
Intended Recipients	Group/Persons Consulted:			
All REAch2 Staff	<ul style="list-style-type: none"> • Estates • Trustees • Exec Group 			
Monitoring Arrangements and Indicators:	<ul style="list-style-type: none"> • Estates compliance audits to be undertaken annually • Incident monitoring • Contractor performance outputs • Training compliance 			
Training/Resource Implications:	All relevant staff must ensure they have undertaken suitable asbestos training, including all designated Responsible Persons under this policy.			
REAch2 Touchstone	KPI 4: Wellbeing of staff and children is effectively supported			
REAch2 KPI	N/A			
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Summary				
<p>To ensure we suitable manage asbestos this policy will set out the company wide controls and action to be observed and adhered to by all staff and contractors. All staff have their role to play in effectively managing asbestos, and all are to encourage to take action where needed to ensure this policy is observed. All pre- 2000 built schools must ensure a Responsible Person is designated and trained, and that all registers, Management Plans and log books are up to date and pro-actively managed.</p>				

Introduction

As an employer, REAch2 Academy Trust has the overall responsibility for the health, safety and welfare of all staff and pupils within its academies. We recognise the serious health risks presented by failing to manage asbestos material, and will ensure that appropriate resource and attention is given to this serious subject.

This policy sets out our commitment to managing asbestos material in our schools, many of which are older buildings that are known to contain asbestos materials.

Although overall accountability for health and safety lies with REAch2 Academy Trust, there may be day-to-day operational activities that are delegated to individual academy sites. For sites that we identify as pre-2000 buildings a named Responsible Person will be identified, who will work closely with our estates team to ensure the requirements of this policy are met.

We all have our part to play in managing asbestos and must all champion safety at every opportunity.



Sir Steve Lancashire
Chief Executive

What is asbestos, and why do we need to manage it?

Asbestos is a term used for various forms of naturally occurring fibrous silicate minerals, which were extensively imported and added to building materials used in the UK from the 1950's up until its ban in 1999. Any building built before 2000 has the potential to contain asbestos.

When asbestos fibres are inhaled, they can cause serious diseases and the increased risk of lung cancer for asbestos workers who smoke. A key part of this policy, and the schools associated management plans, is to ensure that works are managed as to prevent any exposure to our staff and building occupants.

Due to the archetype of many system-built schools, we must always take a cautious and pro-active approach to the management of asbestos, and should always assume a product to contain asbestos until we have had assurances that it is safe to disturb.

All asbestos containing materials (ACM's) should be controlled regardless of type. ACM's can be found in under floor services, floor, ceiling tiles, pipe covering, textured coated ceiling, heat deflection materials and in many other forms.

Our Legal Duty

To ensure that risks from asbestos in places of work are managed, the Control of Asbestos Regulations 2012 places responsibility on those duty holders for the maintenance or repair of work premises. For the purpose of this policy, REAch2 Academy Trust are the duty holder, and will work with schools to ensure that key tasks are appropriately delegated.

The Control of Asbestos Regulations 2012 requires the person who has the duty (i.e. the 'Duty Holder') to:

- take reasonable steps to discover if there are materials containing asbestos in non-domestic premises and if so, to determine its amount, where it is and what condition it is in
- presume materials contain asbestos unless there is strong evidence that they do not
- make, and keep up-to-date, a record of the location and condition of the asbestos- containing materials - or materials which are presumed to contain asbestos
- assess the risk of anyone being exposed to fibres from the materials identified
- prepare a plan that sets out in detail how the risks from these materials will be managed
- take the necessary steps to put the plan into action
- periodically review and monitor the plan and the arrangements to act on it so that the plan remains relevant and up-to-date
- provide information on the location and condition of the materials to anyone who is liable to work on or disturb them

Responsibilities

Trustees

Trustees are to champion good asbestos management across REAch2 and support the aspirations of this policy. As key stakeholders, they are to be informed and furnished with overall asbestos management information, including where incidents have occurred and corrective actions taken.

Chief Executive / Chief Operating Officer

The Chief Executive shall:

- Champion safety and asbestos management to all REAch2 staff, ensuring that appropriate time is provided to safety critical matters at relevant Trustee Board meetings.
- Provide such resource as is required to effectively manage the risk of asbestos
- Ensure that Trustees are provided with appropriate information on the management of asbestos across REAch2 schools, including any action arising from asbestos incidents.

Head of Health, Safety & Wellbeing

The Head of Health & Safety will:

- Provide competent guidance to REAch2 Academy Trust on its statutory obligations to manage asbestos materials
- Provide oversight and ownership of the Asbestos Management Policy
- Provide advice and guidance on actions to be taken in the event of any suspected release of asbestos materials
- Provide guidance on the investigation of any serious asbestos release instances, including the liaising with any enforcement officers

Head of Facilities & Assets

The Head of Facilities & Assets shall:

- Ensure that all schools built pre-2000 have completed a site specific Asbestos Management Plan
- Maintain and oversee a planned program of work to address any identified asbestos works in schools, reporting to the Chief Operating Officer
- Ensure that suitable contractors are vetted and selected for planned works to REAch2 Academy Trust schools
- Maintain an asset and compliance management system to ensure that asbestos survey details, works and removals are appropriately logged and managed
- Report to the Head of Health, Safety and Wellbeing any incident that had the potential to release asbestos materials
- Ensure that appropriate audits are undertaken to assess the validity of asbestos management data
- Ensure that schools are provided with appropriate support resource via the Senior Architectural Technologist and Regional Building Surveyors

Head of Projects

The Head of Projects shall:

- Ensure that all project work is conducted with due regard for the risk of asbestos disturbance.
- Arrange, where necessary, the completion of any refurbishment and demolition survey to be undertaken and ensure that all asbestos works are undertaken by a competent UKATA accredited contractor.
- Report immediately to the Head of Facilities and Asset and Head of Health, Safety & Wellbeing any incident or shortcoming in asbestos management.
- Ensure that all appointed contractors, where acting on behalf of REAch2 are competent and made aware of the asbestos survey.
- Remove / suspend any works that, where not sufficiently managed, present a risk of asbestos disturbance.

Headteacher

The Headteacher will:

- Ensure that the duties outlined in the Policy are observed and communicated to relevant school staff
- Ensure that the school has a named Responsible Person, ensuring that they have sufficient time for the undertaking of training and the fulfilment of their duties. *Note this does not apply to schools constructed post 2000.*
- Report any building fabric damage immediately to the REAch2 Estates Team
- Ensure that all buildings built pre 2000 have an appropriate Asbestos Management Plan completed (using a REAch2 supplied template)

Responsible Person (Schools)

The Responsible Person shall:

- Ensure that a site specific Asbestos Management Plan is prepared for any school built pre 2000
- Ensure that the Management Plan is effectively communicated to all school staff
- Monitor all contractor works at the school, ensuring that all contractors likely to be undertaking intrusive works view the asbestos register and sign the asbestos log book
- Provide a key point of contact for the Head of Health, Safety and Wellbeing and Estates Manager for matters related to asbestos management
- Provide onsite support for the investigation of asbestos related incidents
- Attend such training, as deemed necessary, for the fulfilment of their duties
- Report any incidents immediately to the Estates Team

All Staff

All staff must:

- Ensure they attend any health and safety course, including undertaking basic online asbestos awareness training or face to face asbestos awareness training, regardless of the building they work in
- Immediately report any defect or damage to the building that may have the potential to release asbestos debris or otherwise present a safety risk
- Follow any guidance and instruction provided by REAch2 Academy Trust
- Never interfere or disable any safety precaution provided to safeguard occupants i.e. guarding, safety signage or workplace instruction
- Report immediately any contractor, staff member or visitor working in a way that may put others at risk or present a risk of damaging asbestos materials
- Champion safety at every opportunity, and make it their responsibility to educate others to create a safe place of work

Training

REAch2 Academy Trust will ensure that a robust training plan is managed for all staff that may either come into contact with or work near asbestos.

Training	Target Audience	Validity	Delivery
Asbestos Awareness	<ul style="list-style-type: none"> • All school and Central Team staff 	3 year	Online
Management of Asbestos in Schools	<ul style="list-style-type: none"> • Premises managers • Responsible Person (school) • Regional Building Surveyors • Head of Projects • Head of Facilities and Asset 	3 Years	Online
BOHS P405 or equivalent	<ul style="list-style-type: none"> • Head of Health, Safety & Wellbeing 	5 years	External provider

Management of Asbestos

- All academies, that were built before 2000, **must** have a current Management Survey (which complies with up to date asbestos regulations)
- For academies built between 2000 and 2010, a design statement to confirm that asbestos was not used in the construction is sufficient. This includes items transferred from old buildings such as plant and equipment that may contain asbestos.
- If the academy is planning either a demolition or refurbishment, then a Demolition and Refurbishment survey must be carried out before work commences.

- The above surveys must be carried out by REAch2 approved licensed contractors with relevant UKAS Accreditation.
- The survey must include locations of any potential ACM's e.g., storerooms, yards, outbuildings, under floor services, pipes, ceiling voids, corridors etc.
- Each Academy must prepare an Asbestos Management Plan using the provided template document
- A **register** of location(s) of any ACM's must be recorded and include:
 - Date of inspection
 - Date of next review
 - Should be supported by a marked floor plan and photographs
 - Type of asbestos
 - What products it is contained in
 - The condition
 - Any remedial actions required

The environment around the ACM's is a significant risk factor. ACM's can deteriorate due to age, fire, flood, wear and tear, damage, therefore the register should be reviewed every 12 months by a Licensed Contractor with UKAS Accreditation, unless otherwise stipulated in the Management Survey report or School Asbestos Management Plan.

A copy of the register must be provided to **any person** who will be planning to undertake any intrusive building related works or any groundwork's which may either be near to or have the potential to disturb asbestos material. A log book template is provided for all schools to use and will be checked by the Regional Building Surveyor at planned site visits.

It should always be assumed that there may be asbestos material present when undertaking any work which may disturb the fabric and structure of the building, even if/where it has not been identified and included on the register.

Summary:

- An **assessment** of potential risk from the ACM's must be completed by a Licensed Contractor who is UKAS Accredited
- Consideration should be given to the condition of the asbestos materials, whether they are likely to be disturbed and what action is necessary to manage the risks
- From the outcome of the assessment, prioritise and rationalise an Asbestos Management Action Plan
- It must be ensured that all contractors sign the asbestos log book where any intrusive works are to be undertaken.

Managing asbestos left in place

If the material is in good condition, well protected either by its position or physical protection e.g., encapsulated, reducing the likelihood of damage, and is unlikely to be worked on regularly or otherwise disturbed, it is usually safer to leave it in place and manage it.

The below guidance must be observed if any asbestos material is to be left in situ, removed, labelled or encapsulated.

Labelling of Asbestos Materials



ACM's can be identified easily by the use of a sticker, placed on the location in a prominent position. The use of stickers must be carefully considered, they can become dislodged, moved and assumptions can be made over the limited extent of their use. The use or placement of stickers in communal areas, where they may cause unnecessary alarm is to ideally be avoided.

Where used, asbestos warning labels must contain the survey reference number and form part of the annual inspection program. Stickers must be affixed to clean, dry surfaces and placed in a prominent position.

Stickers are not an alternative to the review and signing of the log book, but as a second line of defence only.

Removal of Asbestos Containing Materials (ACM's)

The removal of any asbestos material introduces a risk, as it will be disturbed as part of its removal. Schools must ensure that prior to undertaking any removal works that they notify the Estates Team, and instruct a REAch2 approved contractor for any planned works.

On completion of an assessment of potential risk, if it is necessary to remove the ACM's, REAch2 Estates must be informed immediately: 01283 881117.

Any contractor used for the removal of ACM's must have a current HSE Licence. The Estates Team will undertake relevant due diligence of all approved contractors to ensure that all relevant RAMS and clearances are in place.

For removal works, requiring a 4 stage clearance certificate, REAch2 will instruct an independent analytical company, to ensure there is sufficient critical review of any works undertaken. All clearance certificates will be provided to the school in addition to being held on the central database. Under no circumstance can the removal and analytical company be the same, nor have any shared interest.

On removal, it must be ensured that the asbestos register is updated and relevant staff informed.

Encapsulation

The process to encapsulate must be based on the fact that removal is not viable. Where encapsulation is to be undertaken, it must be ensured that the asbestos register is updated to reflect this, detailing the type of encapsulation used and monitoring requirements. Encapsulation works must be undertaken by a competent person. For low risk tasks, such as small areas of painting and boarding, it may be possible for the school to undertake such activities, however consent to do so must be provided by the Estates Team. This guidance will only apply to non-licenced work.

Monitoring

Where stipulated in the Management Survey report, monitoring is to be undertaken on known asbestos materials. Monitoring is undertaken to ensure that:

- Its condition is checked to identify any deterioration in its condition
- The room has not had changes in risk profile, such as a low use store becoming a workshop
- To identify changes in the environment, such as damage to the building fabric
- To identify damage to the asbestos material

Monitoring will generally involve the checking of the asbestos register, usually the associated photograph, against the actual conditions on the day. **Any changes or issues that may affect the original risk score must be notified to the Estates Team immediately (estates@reach2.org).**

All persons undertaking condition monitoring must have reviewed Asbestos Awareness training and be provided suitable time to undertake their duties.

All monitoring must be recorded in the on-site asbestos logbook and made available on request to REAch2 staff for inspection.

Schools must ensure that their Parago asbestos compliance entries are up to date and must flag to Estates concerns over data entry or Parago log entries.

Communication

REAch2 Central Staff

All staff will receive basic online asbestos awareness training, to be repeated at three year intervals or following any incident. Asbestos management will be communicated via the Estates Committee, including the overall performance of the remedial works program.

REAch2 Schools

All schools will ensure that where the school is of pre 2000 construction, that all staff have been briefed in the content of the site specific Asbestos Management Plan and the key risk associated with asbestos. All schools are to ensure that a signed register is maintained, either via a standalone asbestos briefing or as part of staff induction, to confirm staff have received all relevant information. Where required, support can be provided by the REAch2 Estates Team and Regional Directors.

As a minimum, school staff should be informed of:

- The name of the site Responsible Person
- The content of the Asbestos Management Plan
- The location of asbestos
- Any controls to be observed (i.e. no affixing to listed surfaces)
- Actions to be taken if they see damage or suspect release

Emergency Procedures

All schools must ensure that a detailed emergency response plan is contained within the site specific Asbestos Management Plan, however as a minimum all staff are to observe the below actions.

If you discover material that you believe may contain asbestos:

1. Stop any work in the area immediately
2. Clear the area of people who may be there
3. Stop others from entering by either locking or appropriate signage
4. Call the Estates Team immediately
5. Samples will be taken to determine if asbestos is present

If you believe you have disturbed asbestos:

1. Stop work immediately
2. Try to prevent any further spread of asbestos without endangering yourself or others
3. Clear people from the affected area
4. Stop others from entering, either by locking off or securing the area
5. Close windows and aid handling units if possible to avoid further spread
6. Inform the Estates Team immediately and await further instruction
7. Do not try to clean area until a sample has been taken and instructed it is safe to do so

Note: If you believe that others may have been exposed, ensure you collect names of those effected, this may include staff, students and visitors.

Audit and Review

The Head of Health, Safety & Wellbeing will ensure that an audit program is maintained for all schools, ensuring that asbestos is included as a standard item. All schools will be provided an audit priority plan, which must be reviewed by the school on at least an annual basis. Routine checks will be conducted by the Regional Building Surveyor and Projects Team as part of any works.

The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)

Under the above regulations any of the following diseases occurring from an activity involving the working or handling of asbestos or any admixture of asbestos is reportable:

- Mesothelioma
- Lung Cancer
- Asbestosis

If you are contacted by an employee of REAch2, in relation to any of the above conditions, or want to report such a condition that you feel may in connection with a work related activity at REAch2, please contact your Regional HR representative.

The Head of Health, Safety & Wellbeing will ensure that all RIDDOR reports are reviewed and submitted, please do not submit any RIDDOR reports prior to them being reviewed and approved by the Head of Health, Safety & Wellbeing.

End