

Asbestos Management Procedures

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1.0 Introduction

This document complements the Warwickshire County Council (WCC) Asbestos Management Policy by adding further detail to the roles, responsibilities and procedures for the management and control of asbestos in buildings.

2.0 Background

Asbestos is a naturally occurring fibre that was extensively used in building materials and products in the UK from the 1950's until the mid 1980's. Asbestos containing materials (ACM's) may be present in any building that was constructed or refurbished prior to 2000. All asbestos use in the UK was prohibited in 1999. Its use was so widespread largely because of its fire and heat insulation properties.

There are three main types of asbestos which can still be found in buildings; crocidolite (blue asbestos), amosite (brown asbestos) and chrysotile (white asbestos).

The danger to health only arises if asbestos fibres are released in to the air and inhaled, this can lead to asbestos-related diseases such as:

- Asbestosis – irreversible scarring of the lungs
- Lung cancer
- Mesothelioma – cancer of the lining of the lungs or stomach

The likelihood of a person developing one of the above diseases increases with:

- The type of asbestos exposed to
- The younger the person is when exposure starts
- The number of fibres inhaled
- The number of times exposed
- Smoking

There is usually a long delay between first exposure to asbestos and the onset of disease, typically between 15 and 40 years.

There is no cure for asbestos-related diseases and currently, past exposure to asbestos kills c. 4,000 people each year in the UK.

Anyone could potentially be affected by asbestos, however, statistics show that the persons most likely to be at risk of exposure, in terms of relevance to WCC activities, are those who are engaged in the building trades and maintenance operations including the following occupations: carpenters, plumbers, electricians, other building workers, maintenance operatives, cable layers, caretakers and persons engaged in similar maintenance activities.

Although new building products and materials no longer contain asbestos fibres, Warwickshire County Council's buildings, as is the case with many property estates, were previously built with materials and products which may contain asbestos fibres.

The Health and Safety Executive (HSE) advise that, asbestos containing materials in good condition are safe unless asbestos fibres become airborne, which happens when materials become damaged. So long as asbestos containing materials are kept in good condition and are not being, or likely to be, disturbed they pose little real threat to health.

A good standard of long term management of any asbestos containing material which remains in the buildings is the best approach, therefore, competent management of asbestos in premises is the approach which has been adopted by WCC.

3.0 Roles And Responsibilities

Chart 1 below outlines the organisational structure for the management and control of asbestos risks. The responsibilities and actions to be undertaken by the specified persons are detailed below in section 3.1.

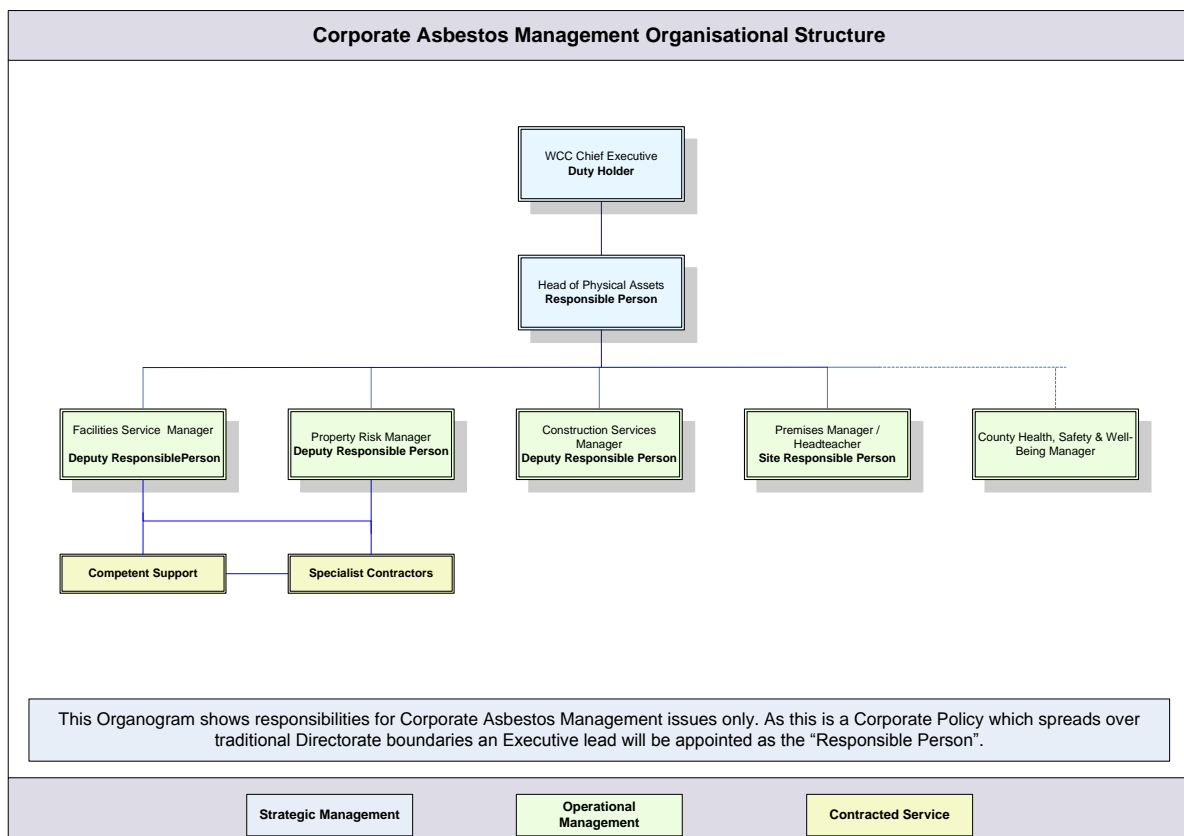


Chart 1: Corporate Asbestos Management Organisational Structure Organogram

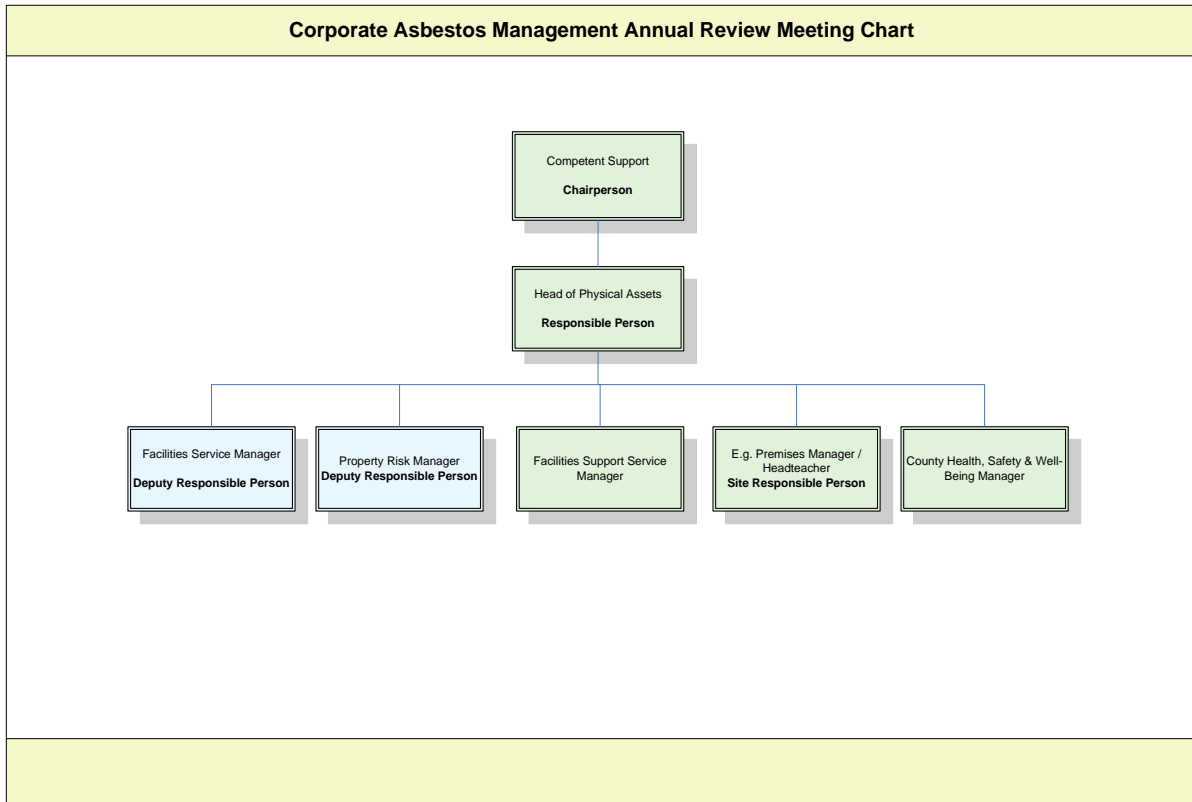


Chart 2: Asbestos Management Control Committee Organogram

Statutory Duty Holder -

WCC Chief Executive

The Chief Executive has overall responsibility throughout the County Council for implementing and achieving the objectives of the health and safety policy statement and to this effect is the person with whom ultimately the duty is placed with regards to the control and management of asbestos.

The County Council has delegated to the Chief Executive the responsibility for monitoring that Services comply with WCC's Health and Safety Policy.

The Chief Executive requires Strategic Directors to provide regular information on health and safety performance regarding the Services of the County Council under their control.

The Chief Executive will delegate in writing, the monitoring, reviewing and auditing as required under this policy to the 'Responsible Person'.

Responsible Person -

Head of Physical Assets

The Responsible Person shall have responsibility for the development and implementation of the policy corporately, and for the allocation of resources for the management of asbestos risk within County Council occupied buildings.

The Responsible Person will appoint in writing Deputy Responsible Persons, and in conjunction with them have responsibility which will include developing and implementing training programmes for all Site Responsible Persons, caretakers and County Council employees who plan, manage or implement works that may involve asbestos risk.

Deputy Responsible Persons –

Facilities Service Manager/Construction Services Manager/ Property Risk Manager

In conjunction with the Responsible Person, responsibility shall include developing and implementing training programmes for all Premises Representatives (Site Responsible Persons), caretakers and County Council employees who plan, manage or implement works that may involve asbestos risk.

The Deputy Responsible Persons are the staff within WCC with whom the duty is placed in order to:

- Ensure that any contractor employed to work on behalf of WCC on confirmed or suspected asbestos containing materials is fully HSE licensed and works in accordance with this document
- Manage asbestos survey, testing, remedial and risk minimisation programmes. Will maintain the central asbestos data base (The Asbestos Management Plan located on AtlasWeb) and ensure all amendments/revisions passed to them are uploaded.
- Ensure that adequate resources are available for those that work under Facilities direction to enable them to undertake any monitoring, inspection, testing, maintenance, encapsulation and the storage and disposal of waste requirements, and highlight to the Responsible Person any additional resources required.
- Confirm that there are adequate competent staff within WCC to support this role and that the staff are aware of their responsibilities under this policy and highlight to the Responsible Person any additional resources required;
- Ensure that all analytical support is carried out by appropriate and experienced support.

Site Responsible Persons -

Facilities Support Manager/ Head Teacher/ Premises Representative/ Site Manager/Centre Manager

This is the most senior person on the premises with health and safety responsibilities and is required to ensure that:

- The health and safety arrangements for the premises take into account the additional responsibilities and arrangements of the policy document
- Any contractor working on confirmed or suspected asbestos containing materials must comply with the requirements of the Health and Safety Executive's (HSE) Approved Code of Practice L143 '*Managing and working with asbestos*', WCC Asbestos Management Policy and Procedures, and must be fully HSE licensed.
- All contractors are inducted on to site and that, as part of the induction, must review the Asbestos Management Plan in order to ensure that relevant information is accessible and that the Plan is updated
- All relevant documentation/updates are forwarded to the Property Risk Team (propertyrisk@warwickshire.gov.uk) in Physical Assets who will update the central Asbestos Management plan
- Other persons that may be affected by any works carried out on the property are taken into consideration prior to works being commissioned and that advice is sought where necessary (this could include employees, pupils, visitors/public, contractors, those using the premises under a letting arrangement etc.)
- Incidents under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations - RIDDOR are reported in line with WCC Accident / Incident Policy
- WCC procedures are being carried out in accordance with the policy document and are regularly reviewed
- Full cooperation is given to Resources staff and specialist asbestos contractors when works are carried out

There is further advice and guidance for Premises Representatives in the Building Occupancy Guide for Premises Representatives which can be found on the WCC Intranet Intranet>Helping You Work>Facilities>Facilities Support>Building Occupancy Guide for Premises Representatives.

Overall daily management responsibilities will normally be placed on and co-ordinated by the relevant manager of the premises, however, this is intended to be a

supported responsibility with a view to maximum overall effectiveness and efficient use of resources.

The table provided below demonstrates how the responsibilities are shared between Physical Assets Service and the Site Responsible Person.

If you are unsure of how to manage asbestos safely contact the Property Risk Team.

Summary of Responsibilities

Physical Assets Service (for overall building management)	Site Responsible Person (Facilities Managers/ Head Teachers/Premises Representatives/Site Managers)
Ensure that all Resources Group staff that hold specific responsibilities for asbestos safety are aware and understand their duties.	Ensure that all staff that hold specific responsibilities for asbestos safety are aware of and understand their duties.
Appointment of competent staff to undertake roles in relation to asbestos safety and ensure that existing and new staff are trained to undertake their duties.	Undertake an annual review to ensure that the Asbestos Management Plan is up to date and that appropriate actions are being taken to minimise asbestos risk. The Asbestos Management Plan must be made available to all contractors and others required to carry out work in the building.
Review of these procedures on an annual basis	Notify Physical Assets Service of any proposed alteration/ modification/ work to any suspected or confirmed ACM so that advice can be provided and to enable records to be updated including schematic drawings and possible review of risk assessment etc.
Generate asbestos surveys and update the Asbestos Management Plan for all WCC premises	Cooperate with Physical Assets Service and their contractors when they attend site.
Assistance/provision of training to premises staff who have responsibilities under this policy	Report all suspected or confirmed ACM related defects to Resources Hotline or have appropriate procedures in place
Ensure that all works carried out to any suspected or confirmed ACM conforms to current good practice, that only WCC contracted consultants/contractors are used and that all relevant details are incorporated into the Asbestos Management Plan	Ensure that all staff are aware of the presence of asbestos containing materials within their buildings and that all operational staff receive adequate training.

Specialist Asbestos Consultant

The Specialist Asbestos Consultant will be selected by those working under the instruction of the Deputy Responsible Person. The Asbestos Consultant will be required to:

- Undertake periodic on and off site audits of WCC asbestos management systems including these policy and procedures

Specialist Asbestos Contractor

WCC Facilities has entered in to a contract with suitably qualified and licensed contractors, the list of contractors is available from the Property Risk Team (01926 476850). It is strongly recommended that only these contractors are used for work on asbestos, or suspected asbestos, containing materials. Where the Site Responsible Person wishes to use an alternative contractor it is for them to ensure adequate and sufficient levels of competency. The Asbestos Contractor will be required to:

- Hold a Full License, issued by the HSE, which allows the contractor to work with asbestos in all its forms.
- Work to this policy and procedures

General Contractors and Sub-contractors

General Contractors and subcontractors commissioned through Physical Assets Service (or where they are procured independently) are not permitted to work with asbestos or suspected asbestos containing materials under any circumstances.

All contractors and sub-contractors must undertake externally certified asbestos awareness training and receive regular refresher training. Records must be kept of asbestos awareness training and copies of which must be forwarded to the Property Risk Team when completed.

Whether a specialist asbestos contractor or a general contractor (and their subcontractors); the contractor must adhere to WCC's Safe Management of Contractors Policy, which is available on the WCC Intranet.

4.0 Management of Asbestos

Though most of the legislation that deals with asbestos refers to non-domestic premises WCC will take the same approach to all of its premises.

Asbestos, or suspected asbestos, containing materials may be managed by regular surveillance, encapsulation and removal where appropriate and reasonably practicable.

There is an explicit duty to manage asbestos in non-domestic premises. This includes:

- *Taking all reasonable steps to find asbestos in buildings, its location and condition*
- *Presuming materials contain asbestos unless there is strong evidence otherwise*
- *Creating and keeping up to date a record of findings – an Asbestos Management Plan*
- *Assessing the risk from the material*
- *Preparing a detailed plan of how to manage the risk from the material*
- *Putting the plan in to action*
- *Reviewing and monitoring the plan*
- *Setting up a system to provide the information to anyone who is liable to work on, or disturb, the material*

Anyone who has information on the whereabouts of suspected asbestos containing material in WCC buildings is required to make this information available to the Physical Assets Service, Property Risk Team who will arrange for the suspect material to be assessed.

4.1 Asbestos Surveys, Asbestos Management Plans and Risk Assessments

Asbestos surveys and management plans

Each premise has an Asbestos Management Plan which includes an annotated CAD building plan.

These records and plans are available to Site Responsible Persons (Premises Representatives) via WCC's AtlasWeb database.

These surveys are based on a non-comprehensive, reasonable standard of investigation (previously known as a Type 2 Survey but since January 2010 is now known as a Management Survey. See 6.0 Glossary). This is a legally compliant standard. Although there is demand for more comprehensive surveys, the following points should be noted:

- A comprehensive survey, detailing all asbestos in every building across an estate of buildings would be too disruptive to building use, create too great a hazard in collecting the information and be too expensive to carry out

- In most buildings, very few areas will be subject to Disturbance Activity and so the vast majority of information, which is difficult to obtain, may not subsequently be used.

Please see Appendix 1 for Asbestos Procedures Flowcharts.

These Management Surveys provide the best, reasonably obtained information taking into account the above considerations. Intrusive bulk samples are routinely taken and the following are examples of how the information will now be used:

- To provide reliable information on asbestos for WCC employees
- As a basis of information for the day to day management of premises
- To provide a legally compliant level of information for Site Responsible Persons who have the (joint) duty to maintain the Premises Asbestos Management Plan and pass information on to contractors and others who may need it.

Further surveys have been carried out for specific projects (Project specific surveys) which have added to the asbestos knowledge gained of WCC buildings. ***It is not however comprehensive and therefore any building fabric material which has not been specifically tested should be assumed to contain asbestos unless there is strong evidence to show that they do not. A more intrusive Refurbishment Survey will be required prior to any work being carried out.***

Asbestos surveys must only be undertaken by appropriate and experienced asbestos surveyors who can demonstrate competence in this area. The Physical Assets Service maintains a list of suitable asbestos surveyors which is available from the Property Risk Team.

It is important that the asbestos information available to individual premises is kept up to date. WCC has a legal duty to do this and Site Responsible Persons must forward a copy of all relevant information to Physical Assets Service, Facilities, Property Risk Team who will arrange for the Asbestos Management Plan on AtlasWeb to be updated.

As many construction/improvement projects take place which are not managed by Physical Assets Service, the central record (AtlasWeb) can only be kept up to date if changes are notified to the Physical Assets Service, Property Risk Team.

When such information becomes available it will be the Manager or Project Manager's responsibility to make sure that all relevant asbestos information is passed to the Resources Group, Property Risk Team. The format of information can be any of the following:

- Copies of Analyst's Reports with or without Risk Assessments
- Waste Consignment Notes where appropriate

- Asbestos remedial contractor's Statement of Cleanliness document

Risk Assessments

Any member of WCC staff or contractor must avoid any work which is likely to lead to the potential of exposure to asbestos to either themselves or others.

Prior to any work being carried out a Risk Assessment must be undertaken. In all cases where there is any likelihood of Disturbance Activity taking place, the Manager who initiates the activity must be in possession of a suitable and sufficient Risk Assessment before the work starts.

Risk Assessments are always required. The Service of the initiating person may not have to carry out the Risk Assessment but must ensure that a suitable and sufficient one is in place. This is to be interpreted using the following guidance:

- If the person is initiating staff within their own Service to carry out the work – the appropriate person within that Service must ensure that a Risk Assessment is carried out for the work activity.
- If a person is commissioning staff from another Service to carry out the work – then the appropriate person within the commissioning Service must ensure that a Risk Assessment is carried out for the work activity.

Risk Assessments must also detail how satisfactory supervisory arrangements are to be used to ensure that:

- The work follows a safe system.
- The area is left in a safe condition once work has been completed.

Risk Assessments must only to be carried out by Competent Person/s and recorded using the Corporate Risk Assessment Form with all relevant information attached as a minimum – See example at Appendix 2.

Risk Assessment records should be seen as a way of demonstrating that the people who have initiated the work have acted responsibly in discharging their role when representing WCC in terms of compliance with legal responsibilities.

In all cases, the person carrying out a Risk Assessment will be entitled to risk information and facilities as can be supplied by the Premises Representative e.g. access to where the work is to be carried out, access to the Premises Asbestos Management Plan, work plans and designs etc.

A written scheme of work or a Method Statement must be prepared to accompany the Risk Assessment.

The Risk Assessment will normally need to be supported by at least the information contained in the Premises Asbestos Management Plan/Asbestos CAD plan and knowledge available at the premises. If all this information does not positively confirm that the activity planned will be safe with regard to potential asbestos risks, sampling and laboratory analysis of bulk samples of the materials must be taken. Copies of all analysis must be sent to the Property Risk Team.

The sampling of asbestos is a potentially hazardous activity and only WCC Contracted Asbestos Analysts should be used for the purpose of obtaining the relevant information. Physical Assets Service maintains a list of suitable analysts which will be made available to all Services on request. Where the Site Responsible Person wishes to use an alternative contractor it is for them to ensure adequate and sufficient levels of competency.

The asbestos removal contractor and the asbestos analyst **must** be independent of each other to ensure independence of actions.

The person initiating the work should not rely solely on the information contained in the Premises Asbestos Management Plan and must ensure that the information required to safely carry out the work is gathered prior to work being started. This type of detailed survey is usually referred to as a Refurbishment Survey (Project Specific).

It will usually be necessary for the person initiating the work or their advisor to meet the analyst on site and explain what is being planned and which parts of the building fabric are to be disturbed. A list or table of sampling requirements can then be properly established.

A copy of the analyst's report and similar relevant information etc will need to be attached to the Risk Assessment to confirm that it is suitable and sufficient.

Where it is found that the relevant materials do not contain asbestos, the Risk Assessment can conclude, with reference to the asbestos risk alone, that it is safe to Proceed with Caution.

Where it is found that the materials do contain asbestos then the project needs to be halted until a safe way is found of carrying out the work. This will require assistance from specialist asbestos contractors who are fully licensed by the HSE to carry out work on asbestos to either assist a contractor with what is to be done, or to carry out what is to be done. Physical Assets Service also maintains lists of Contracted Licensed Asbestos Removal Contractors.

If it is concluded that asbestos is not an issue, the reason why must be recorded e.g.:

- An external brick wall for the purposes of it being drilled from the outside
- A partition wall in a building erected after 1999 – with this date confirmed by the Health and Safety File

If the initiating person needs general Risk Assessment procedural and safety management advice they should contact the Health, Safety & Wellbeing Service. WCC's Property Risk Team should be used for specific asbestos procedural guidance.

When any work activity is being planned, it must not be assumed that asbestos exposure is the only health and safety hazard. Full consideration is also needed, in every case, to other hazards such as work equipment, working at height etc.

The important findings and results of the Risk Assessment must be communicated to and shared with all persons who might be affected by the risks as part of the planning for the work.

Most, but not all, asbestos is related to the Building Fabric. Where asbestos containing materials are encountered in items such as ironing boards, heat resistant mats in science labs etc they should be routinely disposed of when the facilities are available to do so safely. This is often when there is an Asbestos Removal Contractor at the premises for other asbestos related issues.

4.2 Disturbance of the Building Fabric

All materials constituting the Building Fabric are to be treated with a presumption that they contain asbestos unless there is strong evidence to show that they do not.

When the building fabric is disturbed by planned Disturbance Activity, two safety risks are likely to be inadequately managed unless the potential presence of asbestos is properly taken into account :-

- By disturbing the building fabric, asbestos fibres might be immediately released into the air and breathed in by the worker and others who are present at the time.
- After work is completed, if damaged asbestos is left, it may continue to release fibres for some time afterwards unless the materials are left properly sealed.

The following are examples of activities which disturb the building fabric and could release asbestos fibres and must be **avoided**:

- Drilling
- Cutting
- Sawing
- Abrasion
- Making holes
- Breaking the surface of building materials / insulation etc.

If, after due consideration, Disturbance Activity cannot be avoided, a Risk Assessment must be undertaken and should record how the activity is to be carried out safely in accordance with these procedures.

The following are examples of planned Disturbance Activity:

- “Opening up” of building fabric, such as taking down ceiling tiles or opening service riser ducts, is to be regarded as Disturbance Activity and cannot be allowed without a suitable and sufficient Risk Assessment.
NB: The entry into ceiling voids using a loft hatch which is regularly used is not considered to be “Opening Up” of building fabric, but the taking down of a panel above a door for the first time is.
- The fitting of cables and pipe runs into voids in the building fabric is to be considered a Disturbance Activity and therefore requires a Risk Assessment. Asbestos containing materials (ACM), e.g. pipe and other insulation is likely to be damaged unless adequate precautions are taken.
- The most frequent Disturbance Activity is construction and improvement work. These procedures, therefore, give detailed guidance in Section 4.3 below with regards to asbestos safety in construction and other work.

Disturbance of the building fabric can be unplanned e.g. vandalism, storm damage, and this is not classed as a Disturbance Activity. It will not give an opportunity for risk assessment and control in the same way as Disturbance Activity. However, some risk assessment will need to be undertaken under the Duty to Manage. Assessment after the event or discovery is appropriate in these cases. Regular monitoring of known asbestos containing materials will allow any damage/change to be noticed early and help to minimise any potential asbestos fibre exposure.

In order to inform Managers and Premises Representatives who may not otherwise be aware of asbestos safety issues, various e-learning packages are available on AtlasWeb. Additional classroom based Role of the Responsible Person training is also available; contact the Property Risk Team for details.

Where it is foreseeable that there will be a risk of exposure to asbestos by a WCC employee or other person from work planned and subject to Risk Assessment, work **must** be allocated to a fully licensed HSE Asbestos Removal Contractor or carried out with the assistance of such a contractor.

Physical Assets Service maintains a list of Contracted HSE Licensed Asbestos Removal Contractors which can be made available to all Services on request.

Even when it is considered to be safe to disturb building fabric, contractors should always **Proceed with Caution**.

Health and Safety Officers will advise managers in their Services who may disturb asbestos containing materials.

4.3 Construction and Improvement Work

Construction and improvement works need to be planned on the basis that Physical Assets Service will not make financial contributions to such projects to reflect any additional costs of working etc. due to the presence of asbestos containing materials. WCC has legal duties to manage asbestos installations for the purposes of safety, it has no corresponding duty to reduce the true financial burden of construction or improvement projects. Services should factor in to their budget an allowance for any additional costs to a project for dealing with asbestos that is known about or is discovered. Physical Assets Service will not contribute to these costs.

All design for construction is covered by the Construction (Design and Management) Regulations (CDM). Small scale construction projects do not differ in principle from larger scale ones in terms of asbestos risk management, but with the larger projects:-

- It is easier to identify a designer
- Risk Assessment is carried out as a formal, recorded, Design Risk Assessment as well as the more conventional Work or Employer's Risk Assessment
- It is easier to improve the safety of a design using the Design Risk Assessment process, so that Disturbance Activity can be controlled without affecting the other essential design criteria. This can significantly reduce cost and improve safety management overall.

The instigating person must ensure that all known information regarding asbestos risks relating to the premise is made available to the contractor/Project Manager/Principal Designer by means of a refurbishment and/or demolition survey.

WCC will always hold a professional designer responsible for deciding what asbestos risk information needs to be provided for a particular project. The Project Manager should enforce this role. When there is more than one designer, the Principal Designer will have this duty and the Project Manager should record clearly who has taken this role. The information provided to a construction project should normally include Project Specific asbestos information, the details of which have been determined by the designer as being suitable and will have normally been agreed with the Analyst on site, before Bulk Sampling takes place.

A plan for dealing with the asbestos MUST be drawn up and agreed before the start of work.

It is the contractor's responsibility to prepare any necessary Risk Assessment and Method Statement which will detail how they will work safely. These documents need to be evaluated and agreed by the Manager/Project Manager taking responsibility on behalf of WCC.

Subsequently, necessary asbestos remedial actions should also have been completed before construction or improvement work starts on site. In the case of

multi phase projects there may be unrealistic assumptions about how the programme will allow for this between phases and such assumptions, prejudicial to safety, should be avoided.

Where the project is large enough to require formal notification to the HSE under CDM Regulations, asbestos details, Risk Assessments and Method Statements will need to be passed to, and will be co-ordinated by, the appointed Principal Designer. Relevant details will be incorporated into the Pre-Tender Health and Safety Plan for the information of tendering contractors.

WCC will expect designers to actively consider how best the disturbance of asbestos can be avoided as part of the Design Risk Assessment process required to comply with the CDM Regulations.

Care shall be taken by designers to adequately inform Asbestos Analysts on site prior to Project Specific sampling as to exactly which areas need to be surveyed and the extent of the work. Destructive sampling (for a refurbishment or demolition survey) will normally call for areas to be taken out of use and for services to be turned off on the grounds of safety. Additionally, Analysts working in this way may need to request enclosures and other safety precautions.

If there is **any** asbestos contained within waste; that waste is to be treated as Hazardous Waste for the purposes of the Hazardous Waste Regulations 2005. Waste asbestos containing materials must only be removed by a registered waste carrier and must be taken to a waste site that is permitted to receive asbestos waste.

The Manager/Project Manager must be given a Waste Consignment Note from the Asbestos Removal Contractor to assist with the need to prove that the responsibility of WCC has been properly discharged. This should be forwarded to the Property Risk Team (propertyrisk@warwickshire.gov.uk) upon receipt.

Where waste has not been generated from asbestos remedial works (therefore no analytical documentation has been produced) the contractor must issue a Statement of Cleanliness on completion of the works.

If the amount of asbestos containing waste to be removed exceeds 500 kgs, or if the amount of waste, along with other hazardous waste removed from the premises, exceeds 500kgs for any 12 month period then the premises must be registered with the Environment Agency as a hazardous waste producer.

5.0 Action to be Taken in the Event that Asbestos is Discovered

Anyone who discovers materials which give concern with regards to asbestos must report the finding so that the matter can be dealt with urgently. Materials likely to contain asbestos and falling into poor condition due to lack of maintenance or which have been subject to accidental or gradual damage, i.e. inadvertent disturbance, need attention without delay. See the Procedure for Management of Emergency Asbestos Incidents flowchart in Appendix 1.

The area concerned should be immediately taken out of use on a precautionary basis by the Premises Representative and the matter also referred to the relevant Physical Assets Service, Building Surveyor or Engineer for urgent testing and action to make the area safe. NB It is unacceptable to keep an area classed as unsafe, in use, until it can be re-classified as safe by a Competent Person.

Examples of legitimate concerns:

- Insulation board subject to accidental damage
- The surface of materials likely to contain asbestos found to be damaged, frayed or scratched
- Protective coverings to insulation damaged or missing
- Debris or dust accumulated below materials which may contain, or in the past before replacement may have contained, asbestos.

If an incident such as accidental exposure or suspected accidental exposure has occurred, the matter should be reported by the relevant Service as an incident. The employee or employees concerned must enter the incident in the accident reporting system and the Health, Safety & Wellbeing Service should consider reporting the occurrence to the HSE under RIDDOR if relevant. All reporting should be by the quickest practical means available.

When there has been any question of any release of asbestos fibres, Reassurance Air Testing for fibres in the air should be instructed. This work will be undertaken by a WCC contracted, UKAS Accredited Asbestos Analyst. Records of reassurance air testing will be held on AtlasWeb and associated with the specific room / area.

In the event of a significant concern over premises safety involving asbestos or in reaction to a particular incident or accident where asbestos release is an issue, those informed, for any WCC building, must include the Head of Physical Assets.

6.0 Glossary

ACM - Asbestos containing material/s.

Contracted HSE Licensed Asbestos Removal Contractor - A contractor who has been contracted by the County Council for the removal of asbestos and who will also be listed by the HSE as having a relevant license. Generally such contractors are also competent as asbestos waste removal consignors.

Asbestos Survey - Asbestos mapping of a premises by an asbestos analyst using Bulk Sampling techniques and providing a written report detailing what has been found on a room by room basis. Standards are laid out in HSG 248 and 264. NB

WCC will not accept surveys nor individual Bulk Sampling work carried out by Removal Contractors.

Building Fabric – The materials and components used to construct a building including plant and machinery.

Bulk Samples - Samples of material taken for laboratory analysis by competent persons following the scientific procedures outlined by HSE Guidance HSG 248 and 264.

Competence/Competent Person - A person who is competent is considered to have the relevant skills, knowledge, attitude, training and experience in order to manage safety issues adequately under safety legislation and other standards.

Competent Asbestos Advisor - Warwickshire County Council will consider the following to be recognised as having sufficient competence to hold this title:-

- Building Surveyors and Engineers employed by WCC who, as well as having professional construction experience/qualifications have received asbestos management training and have passed the relevant assessment i.e. British Occupational Hygiene Society (BOHS) P405 - Management of asbestos in buildings and/or BOHS P402 – Building surveys and bulk sampling for asbestos modules.
- Professional construction consultants, either employed by WCC or appointed under consultancy contracts, who have attended asbestos management training and passed the relevant assessment i.e. BOHS P405 - Management of asbestos in buildings and/or BOHS P402 - Building surveys and bulk sampling for asbestos modules.
- Approved Asbestos Analysts who are at the relevant time engaged by WCC to give Project Management advice on a particular project
- Other professional advisors, who hold demonstrable competence through BOHS Asbestos Competence and Proficiency Modules and relevant experience:
P402 Building surveys and bulk sampling for asbestos modules.
P405 Management of Asbestos in Buildings
S301 Asbestos and Other Fibres (Consultant Level)

Competent Support – An appropriate, independent third party employed by WCC to audit its asbestos management systems and chair annual review meetings.

Destructive Sampling – physical sampling of materials which will involve some damage to the item being sampled.

Disturbance Activity - Drilling, cutting, sawing, abrasion and other similar activity which affects the Building Fabric as defined, likely to release asbestos fibres if the materials disturbed contain asbestos.

Manager - This is the manager who is responsible for requesting or initiating the work which may result in the risk of asbestos exposure. Such Managers have authority which legally binds the County Council in situations where it is likely to be held responsible for safety outcomes and liability.

Premises Manager - is the person who has day-to-day management control of the premises. This will usually be a manager at the premises, but in some cases it may be a manager at a remote location e.g. a Head Teacher at a school, or an appointed manager who has appropriate responsibility for health and safety.

Principal Designer - The definition is that used by the Construction (Design and Management) Regulations 2015:

‘Any person who prepares a design, or arranges for any person under his control to prepare a design, relating to a structure or part of a building.’

Note: Designers are for the purposes of these Procedures anyone who influences the design to any extent which may affect safety. Generally, Designers will affect construction method or materials or both.

All design for construction falls under the CDM Regulations. There are no lower limits beneath which the duties do not apply. Some form of design risk assessment should always be undertaken by Principal Designers and recorded with the intention of proving reasonable elimination of all safety hazards, including asbestos exposure, during construction, use and demolition of the building structure and associated engineered services.

Where residual hazards remain in the design may not be obvious, there is a duty on the Principal Designer to pass information on to those who may not otherwise take them adequately into account.

Proceed with Caution - means that workers will actively be aware of the possibility of still finding asbestos, even though all reasonable attempts have been made to find it before work starts. It may be possible that ACM's will be discovered by the Disturbance Activity itself.

When workers have any suspicion that they have found asbestos they must stop work immediately, make the area safe and notify their manager immediately.

All ceiling voids and service ducts etc likely to be “opened up” should only be “opened up” slowly and carefully with minimum application of energy and air disturbance.

The principles behind Proceed with Caution should be included in any relevant worker training.

The Proceed with Caution principle will not be accepted as a substitute for adequate planning of work or the undertaking of a Risk Assessment.

Project Manager/Project Co-ordinator - The officer of the County Council with the duty to manage the construction project, is also a construction professional, and has the competence to identify a Principal Designer. A Project Manager is also a Manager as defined above for the purposes of these Procedures

Project Specific Asbestos Investigation - A suite of asbestos bulk sampling which is requested by the Principal Designer of construction works and which is likely to involve at least some, full access, destructive sampling over a very limited area to inform the safety management of a construction project at the design stage.

Reassurance Air Testing / Clearance Air Testing - Air Testing is carried out by asbestos analysts to HSG 248 *Asbestos: The analyst's guide for sampling, analysis and clearance procedures*. There are several different applications of air testing. The most common for the purposes of these Procedures being:

- Reassurance Air Testing with the intention of giving the best practical measure of safety without creating an unsafe condition
- Clearance Air Testing which is used to prove that an area is safe for re-occupation following a removal operation.

In both cases, the clearance indicator level of minimal fibre counts in air is used as the desirable objective and as an indication of safety.

Safe System of Work – a procedure which results from a systematic examination of a task in order to identify all the hazards/risks. It defines safe methods to ensure that hazards are eliminated or risks minimised.

Statement of Cleanliness – a document that the asbestos remedial contractor will complete upon completion of remedial works, a proforma copy of which can be obtained from Property Risk Team.

Swab Tests - Specialist asbestos bulk sampling tests which can only be legitimately used as a positive asbestos identification test– i.e. safety cannot be proved by these tests, only contamination. They are typically used to test surfaces such as stored materials and books. The localised nature of sampling in this way should also be noted.

Types of Asbestos Survey – As detailed in *HSG 264 Asbestos: The Survey Guide*

Management survey – (Previously known as Type 1 and Type 2 Surveys) the standard survey, to locate, as far as reasonably practicable, the presence and extent of any suspect ACM's in the building which could be damaged or disturbed during normal occupancy, including foreseeable maintenance and installation, and to assess their condition.

Management surveys can involve a combination of sampling to confirm asbestos is present or presuming asbestos to be present.

NB the samples are used to confirm or refute the surveyor's opinion – therefore the survey is more reliable – a good surveyor's opinion is still critical and presumption is still used in effect to limit the number of samples taken

Visual inspection	Y
Samples taken	Y
Destructive / full access sampling Carried out	N
Condition of installations assessed	Y
Extent of installations assessed	Y
Need for surveyor training and experience	Y
Extent that materials must be presumed to contain asbestos H/M/L	M
Will a further survey be likely	Y
Assessment of presumed ACMs included	Y

Refurbishment and demolition survey – (Previously known as Type 3 Surveys) is needed before any refurbishment or demolition work takes place. It is used to locate and describe, as far as is reasonably practicable, all ACM's in the area where the refurbishment will take place or in the whole building if demolition is to take place. It will be fully intrusive and involve destructive inspection as necessary to gain access to all areas including those that may be difficult to reach. This survey may also be required in other circumstances e.g. when more intrusive maintenance and repair work will be carried out or for plant removal or dismantling.

Visual inspection	Y
Bulk samples taken	Y
Destructive / full access sampling Carried out	Y
Condition of installations assessed	N
Extent of installations assessed	Y
Need for surveyor training and experience	Y
Extent that materials must be presumed to contain asbestos H/M/L	L
Will a further survey be likely	N
Assessment of presumed ACMs included	N

NB. For refurbishment and demolition surveys, destructive or full access sampling will be used throughout the building. Full access sampling is unsafe without areas being taken out of use and services turned / switched off and otherwise made safe. Surveys sold as being refurbishment and demolition are often found to be, in reality, of management survey standard or even less because of the real problems of destructive sampling.

The genuine refurbishment and demolition survey would be difficult to justify unless all areas in a building are already unoccupied prior to major refurbishment works or demolition.

Refurbishment and demolition surveys do not assess the condition of ACMs as it is assumed that the ACM will need to be removed shortly e.g. within 3 months.

Project Specific Asbestos Investigations - WCC Definition (this is not defined by HSG 264)

Principal Designers need to anticipate the effect of the construction phase on the building structure in terms of disturbance of all building elements and any likely asbestos installations that might be involved. Initially at least it will assist with deliberations to have a Management Survey available. The information available should be supplemented under instruction by the Principal Designer to match the actual construction method to be used. Where possible, risks of disturbing asbestos installations should be avoided by use of design review and amendment.

Only where necessary will full access sampling be justified. The Project Specific requirements in total will need to be discussed and agreed with the Analyst in advance of the asbestos survey. The report will need to include a list of the elements which are likely to be disturbed and an account in each case of what type of sampling is appropriate and subsequently what action is being taken to make the construction project works safe. Management initiatives using a range of remedial action including labelling, removal and encapsulation will normally be required.

UKAS – United Kingdom Accreditation Service

Working with Asbestos – Any action where there is the likelihood of disturbance to any suspect material. This includes but is not limited to:

- Painting
- Washing
- Cleaning

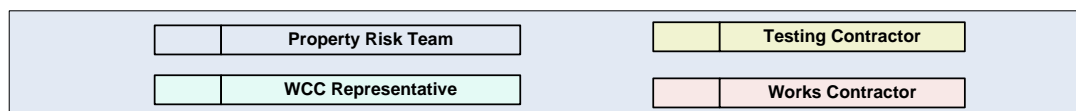
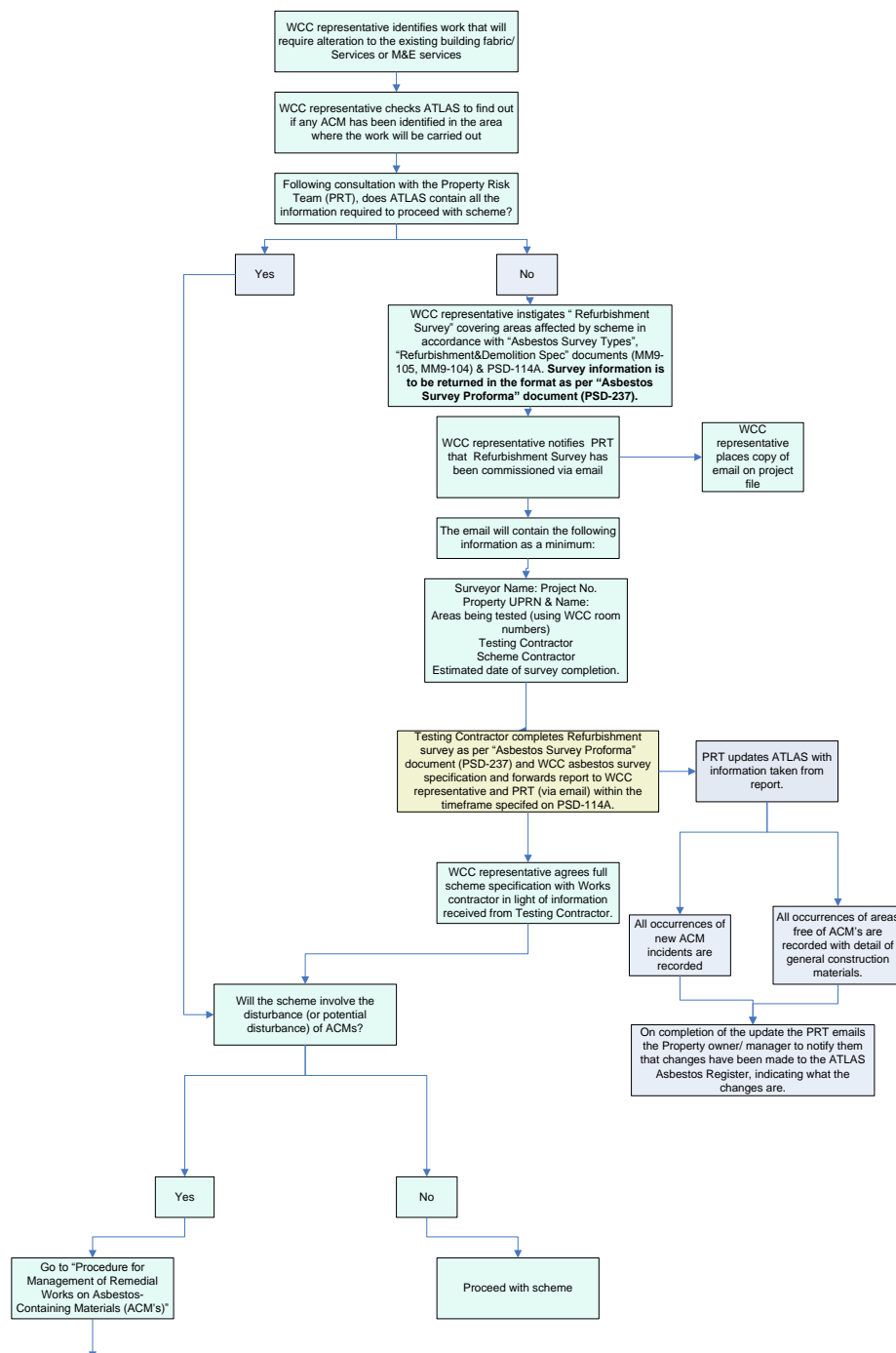
7.0 Primary Contact List

Property Risk Team – 01926 476850
propertyrisk@warwickshire.gov.uk

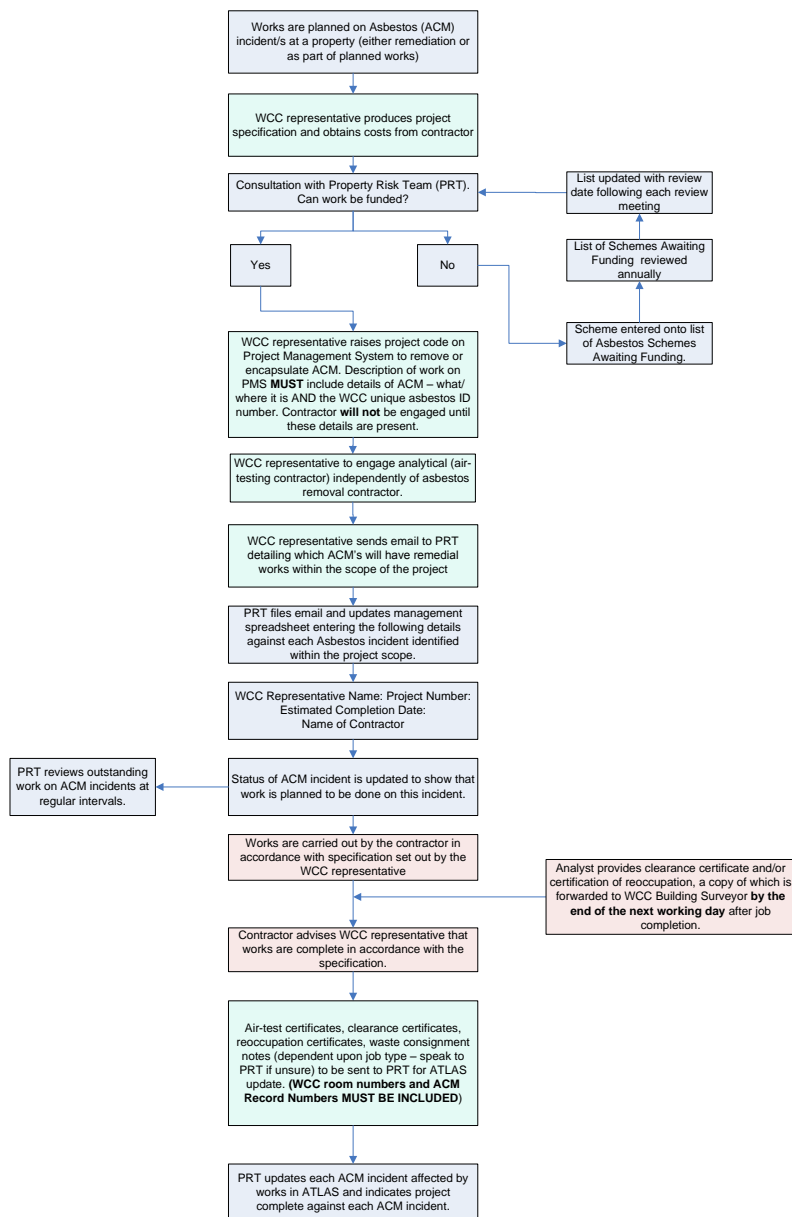
APPENDIX 1

Asbestos Procedures Flowcharts

Procedure for Management of New Asbestos Containing Material being identified.

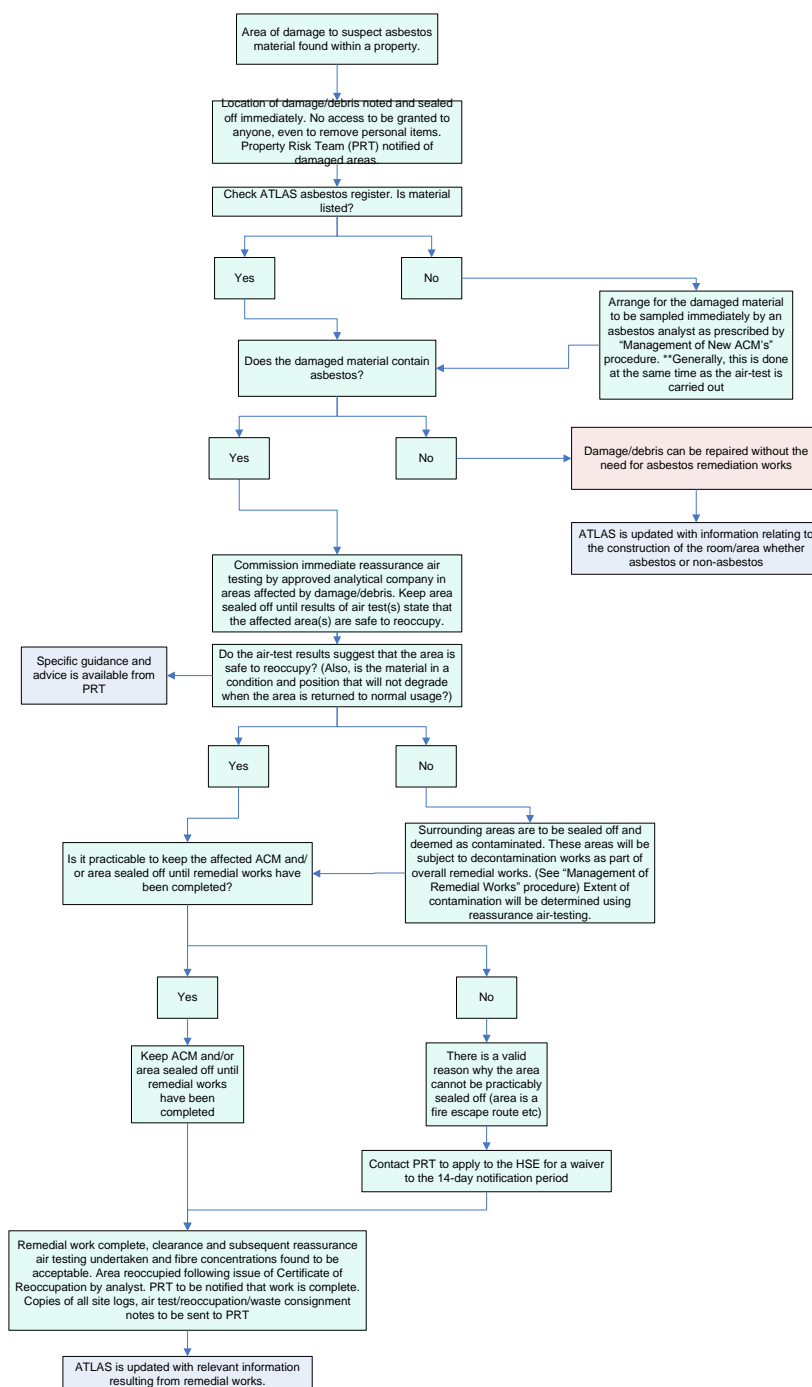


Procedure for Management of Remedial Works on Asbestos-Containing Materials (ACM's)



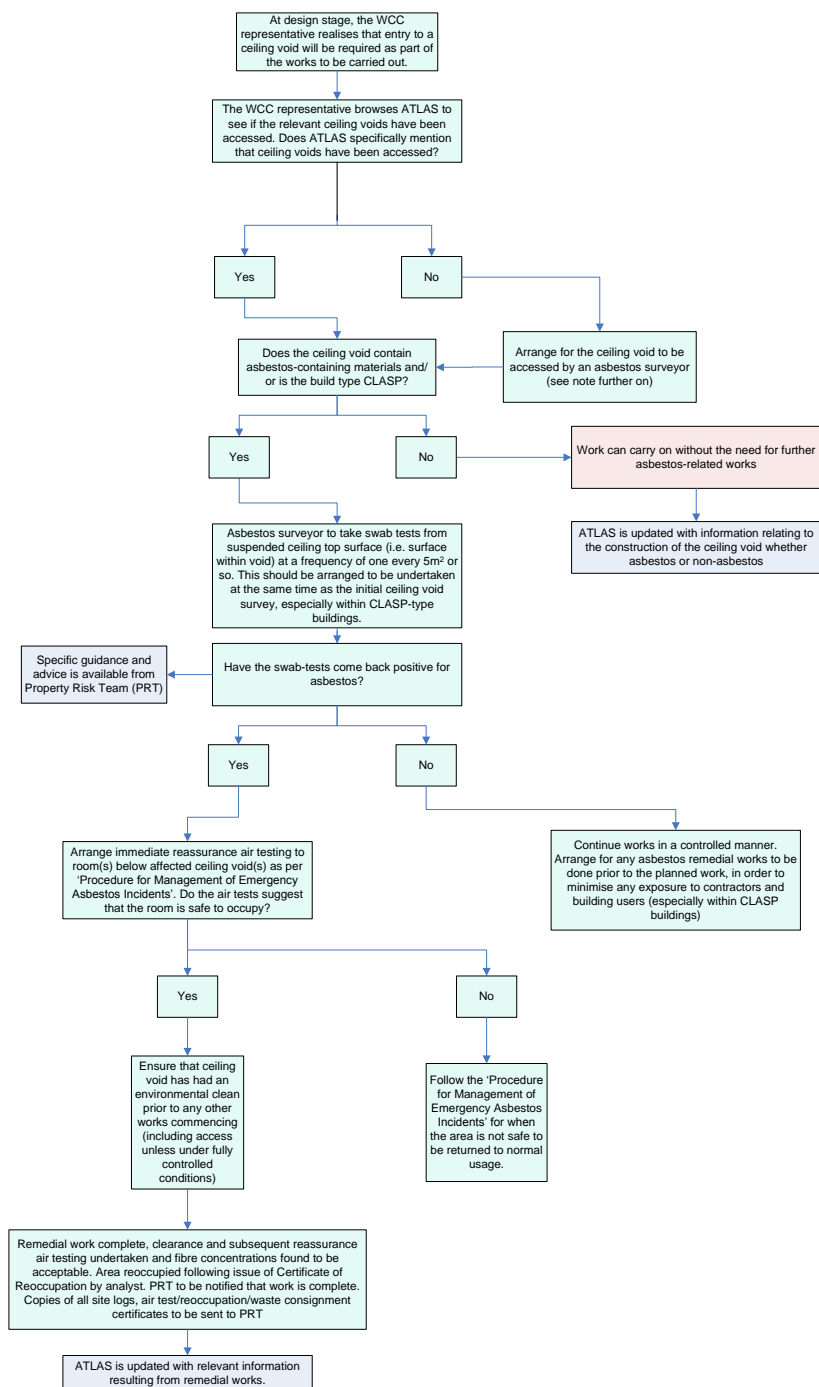
	Property Risk Team		WCC Representative		Contractor
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Procedure for Management of Emergency Asbestos Incidents



	Property Risk Team	WCC Representative	Contractor
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Procedure for Ceiling Void entry



Property Risk Team

WCC Representative

Contractor

APPENDIX 2

Example Asbestos Risk Assessment



Risk Assessment Form



		LIKELIHOOD				
		VERY UNLIKELY	UNLIKELY	LIKELY	HIGH LIKELY	ALMOST CERTAIN
SEVERITY	NEGLIGIBLE	LOW	LOW	LOW	LOW	LOW
	MINOR	LOW	LOW	LOW	MEDIUM	MEDIUM
	SERIOUS	LOW	MEDIUM	MEDIUM	MEDIUM	HIGH
	SEVERE	LOW	MEDIUM	MEDIUM	HIGH	HIGH
	VERY SEVERE	MEDIUM	MEDIUM	HIGH	HIGH	HIGH

Risk Assessment for (Activity/Process/Operation)

Service		Team / Section	
Assessment Date		Review Date	Reference Number

What are the hazards (i.e. what can cause harm)	Who might be harmed and how? (e.g. employees, pupils, members of the public, etc. and the significant risk(s))?	What existing control measures are in place to reduce / prevent the risk? (i.e. what are you already doing?)	Considering existing controls, what is the current risk level (i.e. high, medium or low – use the matrix above)	Further Action to be taken to control the risk? (i.e. only record action/additional controls measures you are going to implement)	Assigned to	Completed by whom & when

Name of Assessor		Signature	
Name of Manager responsible for activity / process		Signature	

Risk Assessment Review Log

Only use this log to confirm that there have been no changes to the current assessment; otherwise an updated risk assessment must be done

Initial Review Date			
Assessor's Signature		Date:	
Signature of Responsible Manager		Date:	

Next Review Date	12 months from initial review		
Assessor's Signature		Date:	
Signature of Responsible Manager		Date:	

Initial Review Date	24 months from initial review		
Assessor's Signature		Date:	
Signature of Responsible Manager		Date:	

Initial Review Date	36 months from initial review		
Assessor's Signature		Date:	
Signature of Responsible Manager		Date:	

Initial Review Date	48 months from initial review		
Assessor's Signature		Date:	
Signature of Responsible Manager		Date:	

Risk Assessment(s) for (Activity/Process/Operation)	
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This form can be used to record and demonstrate that the above risk assessment(s) has been provided to relevant employees (as below) to inform them of the risk assessment findings (i.e. the hazards, risks, and control measures associated with their work).

[illegible]