

Exmouth Community College



Asbestos Policy & Management Plan

This document is designed to inform staff and Governors about both our policy and procedures for ensuring the safe management of Asbestos within the College.

Policy Details	Date
Policy Written	Paul Cousins
Policy Reviewed by Governors	Premises
Policy ratified by Governors	20.09.16
Review Cycle	Annually
Policy Review date	Autumn 1 2017

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Updated – August 2016

EXMOUTH COMMUNITY COLLEGE **ASBESTOS POLICY AND MANAGEMENT PLAN**

Policy Statement

Exmouth Community College is committed to ensuring the health, safety and welfare of all its employees, students and visitors. The College therefore promotes a positive workplace culture that:

- Identifies the hazards and effectively manages the risks associated with asbestos containing materials in all its buildings.
- Assumes asbestos to be present within buildings unless there is evidence to the contrary
- Conforms to appropriate legislative requirements relating to the identification and management of asbestos
- Enables managers and staff to safely manage known asbestos containing materials
- Manages identified risks with solutions that are reasonably practicable
- Sees the provision of information and appropriate training as a core element
- Enables managers to address issues raised by staff, students and visitors
- Responds immediately to the suspected or known release of asbestos material
- Fully supports the active participation of staff representation by recognized Trades Unions in the development and implementation of health & safety related policies and procedures.
- Assess identified asbestos or asbestos containing material potentially accessible to staff or students as being of significant risk and as such is formally inspected every six months (see section entitled 'Regular Scheduled Inspections' for further details)

Background

The use of asbestos within building materials has been banned since 1999. However, many older buildings, such as some of those within the College, were built when it was legal to use materials containing asbestos.

Over the years considerable legislation has been introduced to protect the public and employees from the effects of asbestos. The latest legislation is the Control of Asbestos Regulations 2012. In addition arrangements to deal with asbestos during construction may also be required by the Construction (Design and Management) Regulations 2015. The impact of asbestos related illness should not be underestimated. However, it must be stressed that materials containing asbestos, in themselves, do not pose a danger provided that they are identified, in tact and in good condition.

The County Council commissioned an asbestos survey which was undertaken across the County by a specialist company in the field of asbestos identification and management between 2003 and 2006. The survey identified the location of any asbestos, the type of asbestos material involved, the vulnerability of the asbestos (i.e. how likely it is that it could become damaged) and whether it was covered (i.e. protected by paint or carpet).

The asbestos survey undertaken for most of the campus was only a Type 2 survey. This means that only readily visible or accessible materials were surveyed and/or sampled (sent away for analysis).

During recent years a number of projects have taken place within the College that have required Refurbishment and Demolition Asbestos surveys to be commissioned in respect of specific areas. These surveys have provided a more in depth investigation in these areas to identify possible asbestos containing materials. It should be noted, however that these surveys generally only cover the specific areas where work is proposed. As a result they should not be regarded as a total inspection of the area in question or that total clearance from asbestos containing materials has been given. The Premises Manager will review each case where invasive work is required.

The College Asbestos Management Plan

The purpose of the College Asbestos Management Plan is:

- To ensure that all asbestos containing materials are identified (The asbestos register, plans and spreadsheets)
- To ensure that all asbestos containing material is regularly inspected regarding its condition and action taken to rectify any issue identified. (Twice each year a formal inspection is made of the identified asbestos to review its condition. Any issues arising from the inspection are dealt with as a matter of urgency).
- Where necessary and practicable to remove asbestos containing material. (It is College policy to remove any asbestos that poses a threat to staff or students and where major refurbishments are taking place to remove any asbestos within the area being refurbished at that time. In this way the level of asbestos within the college will gradually reduce)
- To review the assessed risk level allocated to elements of the asbestos register should there be a change of use in the room in question. For example a change in the use of the room may result in an area containing asbestos which previously was a low risk becoming a high risk.
- To ensure staff are made aware of the presence of asbestos in the workplace
- To ensure contractors are made aware of the presence of asbestos in any areas where they are working
- Where work is required in an area where asbestos has been identified to take all appropriate steps to ensure the asbestos is removed by appropriately licensed contractors or managed effectively during the work.

The Duty Holder

The designated Duty Holder within the College with overall responsible for the management of asbestos containing materials and consequently the legal responsibility is the Governing Body. The Premises Manager is responsible for the day to day management of Asbestos within the College.

However, all staff have a responsibility for the safe management and monitoring the condition of identified asbestos containing material.

The Asbestos Register

The results of the County Council's asbestos survey were held on a central database which was maintained by NPS (South West Ltd). When the College became an Academy this facility was removed. As a result the College now maintains its own database and asbestos plans which are the responsibility of the Premises Manager.

The College Asbestos Register is based upon the original NPS database and has been updated to reflect items identified through the Refurbishment and Demolition surveys together with deleted items. (see 'Background' above for further details).

The Asbestos Register Plans and spreadsheets are colour coded to denote how asbestos containing materials are present:

- Red - Indicates individual rooms or areas within rooms where it was not possible to survey and/or take samples for analysis at the time surveys were undertaken. In some cases it was not possible for the inspector to gain access to individual rooms. In all such cases it must be assumed that asbestos is present in all materials contained within these areas until such time as they have been inspected and it is confirmed there is no asbestos. These areas are gradually being inspected to reduce uncertainty.
- Blue - Indicates that asbestos is present but is contained above or behind other materials and in a position where it is not accessible to staff or students. For example, within a ceiling void above ceiling tiles.
- Green - Indicates that asbestos is present but is contained above or behind other materials and in a position where it is potentially accessible to staff or students. For example tiles beneath a carpet.
- Yellow - Indicates Asbestos is present and in a position where the covering material and therefore the material itself could be damaged. For example, the asbestos containing material has been painted.
Note: On the spreadsheets these entries are white

Copies of all the original and subsequent reports are available in the Premises Manager's office. In addition the information contained within the reports has been copied on to the asbestos register and individual building plans and spreadsheets for ease of reference.

Copies of these plans and spreadsheets are held in the Receptions for each site as well as in both staff rooms, the Caretakers' room and in the Property folder within the Finance and Resources web pages. Copies are also provided for the College IT team and contractors regularly undertaking work within the college. In addition to the above a copy of the plans and spreadsheets are sent to the Devon and Somerset Fire Service and a copy is kept within the Emergency Response box for reference by the Fire Service if required.

Training

The College is responsible for providing adequate information, instruction and training to employees who are, or who supervise those who are, liable to be exposed to asbestos so that they are aware of the risks and necessary precautions which must be taken and procedures which must be followed when working with asbestos or asbestos containing materials.

Where the College employs contractors on an on-going basis, for example cleaning staff, these staff must also receive the same training in asbestos awareness as College staff, including access to the asbestos plans and spreadsheets

Teaching and support staff receive asbestos awareness training as part of their induction programme via a presentation created by the College. This includes information relating to the existence and availability of this document, the availability of the asbestos plans and spreadsheets and staff responsibilities for monitoring the condition of and reporting damage to known asbestos containing materials.

The Handyman and Caretaking staff have access to the same information. However, it is recognised that during the course of their work it is possible that they may come across asbestos or asbestos containing materials not previously identified. For this reason the Premises Manager, the Handyman and Caretaking staff attend a half day Asbestos Awareness Course provided by Devon County Council. This training is refreshed every three years.

Similarly IT Technicians come across asbestos containing materials whilst undertaking their duties. These staff are also provided with the above training course.

A record must be kept on the asbestos register of all those receiving training, together with the date it was provided.

Responsibilities of teaching and support staff

All staff have a responsibility to familiarize themselves regarding the potential for there to be asbestos within the rooms where they work. All staff must read the Asbestos Policy and Management Plan and refer to the asbestos plans and spreadsheets to identify whether there are asbestos containing materials within the rooms they use and the location of any asbestos within the room.

Where staff are working within rooms which have asbestos containing materials in them they must inform the Property Helpdesk of any damage to these materials or materials covering them as a matter of urgency. It must be remembered that the formal condition survey is only undertaken twice a year. Staff in daily contact with the rooms are in a far better position to identify damage at an early stage.

When such damage is notified to the Helpdesk the matter **must** be brought to the immediate attention of the Premises Manager or the Director of Finance and Resources who will assess the situation and take appropriate steps to effect repairs and to ensure the short and long term safety of students and staff.

Staff intending to disturb any surfaces must refer to the asbestos plans and spreadsheets before doing so. This includes simple actions such as inserting drawing pins in to a wall surface or ceiling. If it is identified that where the member of staff wishes to insert the pin (for example) is an asbestos containing material they should refrain from inserting the pin.

Where the member of staff believes it to be essential that the surface is disturbed the matter **must** be referred to the Premises Manager who will meet the individual member of staff to undertake an assessment.

Responsibilities of caretaking and handyman staff

All caretaking and handyman staff attend a half day Asbestos Awareness Course provided by Devon County Council.

All staff have a responsibility to familiarize themselves regarding the potential for there to be asbestos within the rooms where they work. It is recognized that for this group of staff the workplace is the whole of the campus. All caretaking and handyman staff must read the Asbestos Policy and Management Plan and refer to the asbestos plans and spreadsheets to identify locations where there are asbestos containing materials across the campus.

Where caretaking/handyman staff are working within rooms which have asbestos containing materials in them they must inform the Property Helpdesk of any damage to these materials as a matter of urgency. It must be remembered that a formal condition survey is undertaken twice a year. Staff in daily contact with the rooms are in a far better position to identify damage at an early stage.

Staff intending to undertake any work that is likely to disturb any surfaces, for example putting up shelves, must refer to the asbestos plans and spreadsheets before doing so. If asbestos containing materials are present they **must** contact the Premises Manager or the Director of Finance and Resources.

It must be remembered that for most of the site only a Type 2 survey has been undertaken. Therefore, unless the individual can be certain that the area does not contain asbestos (for example, they put up a partition wall themselves using plaster board or the building was built after the year 2000) for any work where, for example, walls or ceilings have to be drilled or removed a Refurbishment and Demolition Asbestos survey will be required.

Caretaking and Handyman staff must also refer to the section below relating to the responsibilities of those instructing contractors

Where the member of staff believes it to be essential that the surface is disturbed the matter **must** be referred to the Premises Manager or the Director of Finance and Resources who will meet the individual member of staff to undertake an assessment.

Responsibilities of those instructing contractors

It is the responsibility of those instructing contractors to highlight the presence of any asbestos containing material in areas where work is due to take place with the contractor before the start of any work. In such circumstances the contractor must be provided with a copy of the appropriate asbestos plan and spreadsheets.

It is **not** sufficient to simply give the contractor the asbestos plan and let him/her inspect it on his/her own. The management of asbestos is ultimately our responsibility and not the contractor's.

As mentioned above for the majority of rooms only a Type 2 survey was undertaken (see Introduction for further details) further examination will be required for more intrusive work. For example if taking down a wall there may be asbestos containing materials behind the outer coating which would not have been identified by the Type 2 survey. In such circumstances a Refurbishment and Demolition Asbestos survey must be undertaken. This will be commissioned by the Premises Manager.

Another example is the removal of carpets. There may be asbestos containing tiles on the floor or adhesive used to fix the tiles beneath the carpet. This should be inspected as far as is practical before the carpet is removed. In this example the tiles/adhesive will not present a danger if they are not damaged. However, this may not be possible to determine until such time as the carpet has been removed. If the contractor is made aware of this possibility he can deal with the matter appropriately.

As a general rule, if in doubt assume the material contains asbestos and act appropriately. Any doubts or issues should be reported to the Premises Manager or the Director of Finance and Resources immediately.

Similarly if the area where work is planned has not been inspected an inspection must be undertaken by a competent person (a refurbishment and demolition survey) before any work is commissioned from the contractor. This **must** be arranged by the Premises Manager or the Director of Finance and Resources. The subsequent report must be shared with the contractor.

Some asbestos can be removed by unlicensed companies and some can only be removed by licensed companies. The R & D report will normally indicate the type of asbestos present. Advice is also available on the HSE web site under:

Advice on licensable work with asbestos
Advice on non-licensed work with asbestos

If in doubt contact the Specialist company that undertook the R & D survey.

In some instances the contractor will not be working directly in the area with the asbestos containing material. However, they should be made aware of any asbestos containing material within the immediate vicinity and told to take care not to disturb the asbestos containing material. See document 'Contractors Induction Pack' for further details.

In some instances where work is due to be undertaken directly with asbestos the contractor may be suitably equipped and qualified to work with the asbestos containing material. For example when required to drill in to such material they may have the necessary protective clothing and extraction equipment attached to their drill that enables them to operate safely. This must be checked with the contractor prior to an order being placed. Proof must be obtained that the contractor is suitably qualified and equipped to work with asbestos in this way. This **must** be arranged in conjunction with the Premises Manager or the Director of Finance and Resources.

In the majority of cases the contractor will be on the County Council' standing list of contractors for construction. All such contractors will have ensured their staff have undergone asbestos awareness training and will have a process for dealing with an unplanned release of asbestos..

In all cases where work is planned that will involve direct contact with or is in close proximity to asbestos form ASB1 must be completed. It is the responsibility of the instructing member of staff to ensure that the form ASB1 is completed correctly in conjunction with the contractor. This **must** be arranged in conjunction with and approved by the Premises Manager or the Director of Finance and Resources and the form ASB1 sent with the order before any work commences.

In all cases where work is required within areas where asbestos or asbestos containing materials are present, even if not directly involved with the work to be undertaken the official order must also contain an instruction for the contractor's staff to report to the reception at The Grange upon their arrival at the College and before they start work. Here they will be given a copy of the plans and spreadsheet for the area where they are working together with a copy of the completed form ASB1. Even though steps will have been taken to identify the presence of asbestos containing material it must not be assumed that this information has been passed down the line to the contractor's staff actually undertaking the work

The person appointing the contractor must ensure that the contractor's staff attending site have been on an Asbestos Awareness Course and that the company has a procedure for dealing with an accidental release of asbestos fibres.

In the case of work being required with asbestos containing material where the contractor is not licensed to remove the asbestos and therefore is unable to manage the asbestos removal it will be necessary to arrange for a licensed asbestos removal company to remove the asbestos material. This **must** be arranged by the Premises Manager or the Director of Finance and Resources

The removal process will generally include a thorough cleaning of the area and a subsequent air test to ensure no asbestos fibres have been left behind. The air test should be undertaken by an independent company. That is to say the company undertaking the asbestos removal must not also undertake the air test.

Responsibilities of those instructing caretaking and handyman staff

It is the responsibility of those instructing caretaking and handyman staff to highlight the need to consult the asbestos register/building plans before undertaking any work to look for the presence of any asbestos containing material in areas where they are due to work before the start of any work.

Much of the content of the above section will also apply here.

Responsibilities of the contractor

The contractor must co-operate in the completion of form ASB1 where appropriate.

Contractors who are likely to undertake work where asbestos may be present and/or detected should only be employed if they are registered with the County Council wherever possible. In this way the College can be assured that they have processes in place to enable their staff to identify asbestos containing material and have a process for dealing with an accidental release of asbestos fibres.

If the company is not registered with the County Council the person responsible for initiating the work must ensure that the company in question confirms in writing that their staff have been on an asbestos awareness course and that they have a procedure for dealing with an unplanned release of asbestos fibres.

The contractor must instruct their staff to report to reception at The Grange and to read all appropriate documentation before they start working on site. These staff are responsible for consulting the asbestos plans and spreadsheets for the area they are working in and for ensuring they do not disturb any asbestos or asbestos containing material.

If the contractor's staff believe they have released asbestos containing material into the atmosphere or found asbestos they must stop work immediately and report this to the Premises Manager or the Director of Finance and Resources. Wherever possible this should be via mobile telephone to reduce the risk of contamination of other areas. The Premises Manager will subsequently initiate the emergency procedures outlined below. The contractor's staff will be included in any evacuation process and actions outlined below in the section entitled 'Discovery of any disturbance or damage to any suspected asbestos containing material'.

Recording

Whenever a contractor is working in an area where asbestos is present, whether working directly with the asbestos, or simply in the same room, a record must be kept of the fact that the appropriate information has been provided and a signature obtained to confirm the fact (form ASB1).

In the case of a one-off instruction the details must be recorded prior to the start of the contract.

In the case of contractors who regularly undertake work across the whole College a one off annual record is sufficient. This **must** include the provision of a set of asbestos plans and spreadsheets for each building and an acknowledgement that the company has received the plans and that it will ensure that any of its employees working on the site will be made aware of any asbestos containing material within the area they are due to work. Any revisions to the asbestos register must also be sent to such contractors.

Copies of all forms used, whether those specific to the College or ASB forms must be retained on the asbestos register file held by the Premises Manager.

A record must be kept on the asbestos register of all staff who have received the College asbestos awareness training together with the date the training was received.

Staff must also sign to say that they have seen and read the asbestos plans and spreadsheets. This record must also be placed in the asbestos register.

Regular Scheduled Inspections

The Premises Manager is responsible for ensuring that regular inspections are carried out of all known asbestos containing material to monitor its condition every six months. The Asbestos Inspection Log within the asbestos register is used to record the findings and the action proposed to resolve any issues identified. Form ASB3 is to be completed to indicate that the work outlined has been undertaken.

Any degrading or damage to asbestos containing materials will be rectified by appropriate contractors as a matter of urgency.

The inspection assumes the presence of asbestos containing materials in three ways:

1. Asbestos is present but is contained above or behind other materials and in a position where it is not accessible to staff or students. For example, within a ceiling void. These items are not inspected as part of the inspection process. However, if work is required to be undertaken in these areas a full inspection must be undertaken before the work is started.
2. Asbestos is present but is contained above or behind other materials and in a position where it is potentially accessible to staff or students. For example tiles beneath a carpet. The asbestos containing items themselves are not inspected but the covering, for example carpet, is inspected to ensure it is in good condition and that the asbestos containing material is not exposed.
3. Asbestos is present and in a position where the covering material and therefore the material itself could be damaged, for example, the asbestos has been painted. These items are all regarded as being at high risk and therefore receive a formal inspection every six months.

Discovery of any disturbance or damage to any suspected asbestos containing material where asbestos fibres may have been released

The Premises Manager is responsible for managing any incidents of asbestos being disturbed and for bringing in a specialist licensed asbestos removal company as appropriate. In the absence of the Premises Manager, the Director of Finance and Resources is responsible.

The risk to health of a one-off accidental exposure to asbestos is negligible. The risk to health increases as the level, duration or frequency of exposure increases. In any disturbance of asbestos

within the College it is always assumed that the maximum level of contamination has occurred as a safety measure and action taken accordingly.

In addition to ensuring the safety of those directly affected by the release of asbestos it is essential that any contamination is kept to a minimum to ensure the safety of others. For example walking a long distance through a corridor used by others could result in the spread of asbestos fibres. Therefore the movement of those directly affected must be kept to the minimum.

The discovery by any member of staff of any disturbance or damage to any suspected asbestos containing material where asbestos fibres may have been released must be reported to the Premises Help Desk (via a mobile telephone if possible) giving as much detail about the level of damage as possible. The Help Desk will inform the Premises Manager or the Director of Finance and Resources immediately. They, in turn, must assess the situation and if appropriate a specialist registered asbestos removal company must be contacted, requested to attend site as soon as possible and provide advice regarding any immediate safety measures that should be taken relative to the incident. They must also ensure that the College Health & Safety Officer is advised of the incident.

If asbestos fibres are likely to have been released as a result of the above **(always assume that they have)** the affected area must be sealed off by the Premises Team until it has been declared safe by a specialist company.

There are many types of asbestos containing material and damage will not always result in the release of large numbers of fibres over a large area. The Premises Manager or the Director of Finance and Resources will assess the level of the damage and determine what action to take following consultation with the specialist asbestos company. Any staff, students, visitors or contractors in the immediate location at the time of the incident will be evacuated to a nearby classroom and kept away from other staff and students.

Until the Premises Manager or Director of Finance and Resources arrives at the scene the member of staff and students should move as far as possible within the room away from the damaged asbestos containing material. Do not open windows or doors. The Premises Manager or the Director of Finance and Resources will trigger the evacuation.

Where the member of staff feels that the release of asbestos fibres is significant and an immediate risk to health he/she should evacuate the room immediately but he/she and students should remain as close as possible to the room until the Premises Manager arrives.

The classroom used for the evacuation should be as close as possible to the contaminated room (but far enough away so as not to put staff and students at risk) to reduce the risk of contaminating other areas of the site.

It may be necessary to move students from a nearby classroom first in order to facilitate the evacuation of the contaminated room to reduce the potential level of contamination.

Others in nearby rooms may also be evacuated to another location as a precautionary measure

It is possible that the clothing of anyone present at the time of the release of fibres may be contaminated. This is the reason for evacuation to a room away from other staff or students. The specialist asbestos removal company will assess the situation and offer advice and support as appropriate. The company will determine when it is safe for staff and students to leave the evacuation room. Any contaminated clothing must be removed and double bagged for safety prior to disposal at a specialist site as asbestos waste. The same applies to any books or equipment present at the time.

The specialist company must be requested to either remove the damaged asbestos or encapsulate it to make it safe. Following this the affected area must be cleaned by the specialist asbestos removal company and an air test undertaken and a certificate of occupation obtained before anyone is allowed back to the affected area.

If staff and students affected have been contaminated by asbestos fibres it will be necessary to undertake an environmental clean and air test within the room into which they were evacuated and possibly the route taken from the contaminated room to the evacuation room.

The specialist company should be asked for their advice regarding the need to report the incident to the Health & Safety Executive under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR). This advice must be followed up by a written statement.

The College Health & Safety Manager should also report the incident to the Devon Health & Safety Team for their assessment and help with dealing with the Health & Safety Executive if necessary.

Where a person has been identified as being potentially exposed to asbestos fibers form PD79 should be completed. See Appendix B. A record must be held on their personal file for 40 years. The forms should also be used for students and placed on their personal files.

The parents of students affected must be notified of the incident and provision made for them to obtain further specialist advice if required.

A flow chart outlining actions to be taken in the event of an unplanned release of asbestos fibres is attached as Appendix A.

Lettings

Those individuals/groups responsible for letting accommodation from the college receive a shortened version of this document detailing all the relevant information together with a copy of the current asbestos plan(s) and spreadsheet(s) for the room(s) they hire.

They also sign to say they have received, read and will comply with the documents.

Paul Cousins
August 2016