Corporate Guidance on Asbestos Management in Schools

(1) Introduction

Headteachers, school governors, and other members of the school management team all need to know who is responsible for asbestos management procedures and documentation, and for ensuring that this is always followed.

School management teams need to see that maintenance, repair work and improvements on school buildings are carried out safely. This means that:

- staff and visitors know what precautions to follow
- where health and safety functions are delegated, staff are appropriately trained and clear lines of accountability are established
- all work on buildings is carried out only after consulting the documentation on asbestos
- an asbestos management survey or refurbishment and demolition survey must be carried out where required
- any work likely to affect asbestos-containing materials is not carried out until there is consutation with those who have duty-holder responsibilities, such as the employer, the governing body, or the building owner, who collectively will determine who is competent and/or licensed to conduct the work.

(2) What is asbestos?

Asbestos is a natural mineral material with a fibrous structure. Before the health effects of its fibres were fully understood, asbestos was considered a valuable building material as it had high strength and fire resistance. It was extensively used in schools for fire protection and insulation.

Asbestos can be found in Victorian schools, system-built, or traditionally constructed buildings and in schools that were refurbished before its use was banned in 1999.

More than 14,000 schools were built between 1945 and 1975 when the use of asbestos was at its height, and many others were refurbished. More than three quarters of schools have some buildings that contain asbestos.

(3) Types of asbestos

Products that contained asbestos ranged from mastics, fillers and decorating products through to wallboards and tiles. Three forms were commonly used. They were: blue (crocidolite), brown (amosite) and white (chrysotile) asbestos.

It is not possible to distinguish between them by eye, and they can occur together. Although white asbestos is less harmful than blue or brown, all are carcinogenic.

(4) When asbestos becomes a risk

Asbestos fibres only become a risk to human health when they are released into the air and breathed in.

The types of maintenance, repair work and improvements that might disturb asbestos include:

- Plumbing installation and maintenance
- Electrical installation and maintenance
- Heating installation and maintenance
- Installation of new ICT equipment and cables
- Window replacements
- Alterations to classroom structure and installing display equipment
- Refurbishment projects

Asbestos fibres can also be released through vandalism or accidental damage, or as materials deteriorate as they age.

(5) Where asbestos is found in school buildings

Asbestos fibres are released more easily from softer materials. The following asbestos-containing materials are commonly found in school buildings.

Thermal insulation

Asbestos insulation products were commonly used in boilers, and on hot water and heating pipe work, for example, asbestos insulation for boilers and pipework in boiler-rooms, underground ducts, and service risers within buildings.

Loose asbestos materials

Used in mattresses and quilts around boilers and as thermal and acoustic insulation in roof spaces and floor voids. They were also used as thermal insulation in kilns, electric storage heaters and cooking ranges. Loose fill is made up of pure asbestos and if disturbed can release large amounts of fibres into the air.

Sprayed coatings

Used mainly for fire protection and insulation, they consist of a high percentage of asbestos usually mixed with a cement binder, applied to beams, columns, ceilings and the underside of floors and canopies. They typically provided fire protection to steelwork and concrete structures in more industrial type buildings and in steel frame buildings. Asbestos fibres can be easily released from sprayed coatings.

Asbestos insulating board

Wall panelling, partitions and ceilings may be made of asbestos insulating board, asbestos cement or a material with an asbestos paper lining. Asbestos insulating board was extensively used in the construction of schools due to its low cost and ease of use. Asbestos insulating board looks similar to plasterboard and can crumble easily if damaged.

Asbestos insulating board packing can be found around steel columns and beams for fire protection of steel framed buildings (ie system-built premises such as CLASP and SCOLA). Ceiling tiles can also be made from asbestos insulating board.

Asbestos insulating board was often used for heat resistant surfaces in laboratories, kitchens and fire escape corridors. Warm air cabinet heaters and fume cupboards were typically lined with it, and window and door surrounds are often made from asbestos insulating board.

Fire resistant boards behind electrical distribution boards are often made of asbestos insulating board.

Paper and felt

Asbestos paper can be found as a facing layer under non-asbestos thermal insulation on pipework and was included as a facing on roofing felt.

Woven asbestos products

These include textiles, ropes and yarns. The most common applications found in schools are asbestos fabric cavity fire barriers in ceiling voids and gaskets on boilers and pipework. If frayed or damaged, asbestos fibres can be easily released. Fuse holders of this era often contain fibrous or woven asbestos. Flash guards within switchboards are often asbestos composites.

Cement products

Many educational buildings contain asbestos cement in roofing sheets and tiles, boiler flues, external window panels and in many other places.
Asbestos cement wall and roofing sheets are also common on garages, storage sheds and ancillary buildings.
Gutters, soffits, cills and shelves can also be made of asbestos cement.

Reinforced plastics

PVC floor tiles & coverings and resin composites, such as bakelite, can contain asbestos. These are typically found in old toilet cisterns and toilet seats; window sills and stair nosings; partitioning; and electrical switchboards, socket outlets and electrical fittings.
If materials are broken or worn they can release asbestos fibres.

Bitumen, resins and mastics

Bitumen mastics, sealants and adhesives were used for floor tiles and wall coverings, adhesives in floors and roofs, roofing felts, damp proof courses and bedding for sinks.
Asbestos textured coatings such as Artex and asbestos paints are found as decorative finishes to corridor walls and ceilings.

(6) Diseases related to asbestos exposure

Asbestos-related diseases (mainly lung cancer and mesothelioma) are the most common cause of death from occupational disease in the UK.

When asbestos-containing materials are disturbed, damaged or deteriorate, fibres can be released into the air. Breathing in asbestos fibres can lead to a number of dangerous diseases, although a slight exposure is unlikely to cause disease.

People who are exposed to asbestos can develop the diseases years later. This is known as the latency period, where the symptoms of the disease are seen a long time after the initial exposure.

Most deaths now are the legacy of the widespread exposure to asbestos, before its use was finally banned. Those most at risk today are people who regularly disturb asbestos, like tradespeople.

Working on or near damaged asbestos-containing materials, or breathing in high levels of asbestos fibres, increases the chances of getting an asbestos-related disease.

However there is no threshold exposure below which there is no risk, and all exposures are cumulative.

There are three potentially fatal asbestos-related diseases. It can take less than 15 years to more than 60 years from first exposure for symptoms to develop.

- Mesothelioma is a cancer of the cells which make up the membrane that covers the outer surface of most organs. It usually starts in the lining of the lungs.

- Lung cancer usually requires a greater exposure than mesothelioma. If asbestos exposure has occurred then the risk of developing lung cancer is greatly increased if a person smokes.

- Asbestosis leads to a scarring of the lung tissue and is a disease that usually progresses slowly. Asbestosis requires a large exposure to asbestos and is rare in people who have worked in schools. People with asbestosis have an increased risk of developing lung cancer and mesothelioma.

(7) Activities that can accidentally disturb asbestos

If you are responsible for school buildings that might contain asbestos, you need to identify where it is, its type and its condition. You need to assess the risks, and manage and control those risks.

If this is not done, asbestos-containing materials could be disturbed or damaged and fibres released into the air. Precautions must be taken to ensure that tradespeople don't put themselves or others at risk by disturbing asbestos.

Examples of activities that have disturbed asbestos in schools causing accidental exposure include:

- A caretaker who regularly swept the school boiler room, unaware that the dust was contaminated with asbestos.

- Teachers who stored materials in a cupboard lined with asbestos-containing materials which became damaged over time, increasing the risk of exposure to fibres. The damage was not reported and was only discovered some time later when a survey was carried out.

- A contractor drilled through a ceiling into asbestos insulation boards. The contractor was unaware of the presence of asbestos as he had been shown straight to the work area without reference to the asbestos register.

- A group of pupils playing football inside damaged the ceiling with the ball, releasing asbestos dust from the roof void.

(8) Asbestos: the legislative framework

The Health and Safety at Work Act 1974 requires employers to protect their employees at work. In schools, it also requires that 'pupils, visitors and all other persons are protected from harm to their health and safety from known or foreseeable risks so far as is reasonably practicable'.

The Control of Asbestos Regulations 2012 places specific duties on those who manage non-domestic premises to identify the presence of asbestos-containing materials, and manage the risks they present.

The Control of Asbestos Regulations 2012 also places duties on contractors, for example to protect their employees.

If you are responsible for the maintenance, repair or improvement of school premises, or of equipment that uses asbestos-containing materials, you will have responsibilities under the duty to manage asbestos.

(9) Asbestos management

Asbestos was used extensively as a building material in Great Britain from the 1950s through to the mid-1980s. It was used for a variety of purposes, typically fireproofing and insulation.

Any building built before 2000 can contain asbestos. When asbestos fibres are inhaled, they can cause serious diseases. To ensure that risks from asbestos in buildings are managed, the Control of Asbestos Regulations 2012 place duties on those responsible for the maintenance or repair of work premises.

Those responsible for maintenance and repair – dutyholders – are responsible for protecting others, who work or use the premises, from exposure to asbestos.

In some schools, the responsibility for maintenance or repair is shared, for example between a local authority as employer and the school. In other schools, the responsibility may fall solely to a governing body as employer.

All dutyholders must ensure that any asbestos containing materials (ACMs) are managed properly.

(10) Dutyholder responsibilities

In a school the dutyholder's responsibilities include:

- keeping an up-to-date record of the location and condition of asbestos-containing materials in the school
- assessing the risks from any asbestos-containing materials in the school
- making plans to manage the risks from asbestos-containing materials in the school
- putting those plans into action
- ensure that staff likely to disturb asbestos are suitably trained

Those most at risk of disturbing asbestos-containing materials and breathing in the fibres are tradespeople and caretakers. Other activities could also lead to accidental exposure.

If fibres are released because work is not properly managed, the staff and pupils in a school could be exposed.

The school must have arrangements in place to ensure that information about the location and condition of asbestos-containing materials is given to anyone who might disturb these materials, including caretakers, contractors, support staff and teachers.

All parties in the school management chain have a part to play in securing the effective management of asbestos in school premises.

These management arrangements must also be effective during school closure periods when school staff presence is minimal.

(11) Who is the dutyholder?

Anyone who has responsibility for the maintenance or repair of non-domestic premises, including schools, is a dutyholder as defined in Regulation 4 of the Control of Asbestos Regulations 2012.

For most schools, the main dutyholder will be the employer, with dutyholder responsibilities in some schools also being shared with the person responsible for the site.

The local authority is the employer for community schools, community special schools, voluntary-controlled schools, maintained nursery schools and pupil referral units.

The governing body is the employer for academies, Free Schools, voluntary-aided and foundation schools.

For independent schools, the employer may be the proprietor, governors or trustees.

Where budgets for building management are delegated to schools, for example by an LA or academy trust, the duty to manage asbestos will be shared between the schools and the LA or trust.

Dutyholder responsibilities are often established via an explicit funding agreement/contract. The extent of the duty depends on the nature of the agreement and responsibilities for repairs and maintenance, as distinct from capital expenditure.

In the case of LAs, a written scheme for the financing of maintained schools will set out the categories of work that will either be financed from the delegated school budget share (revenue repairs and maintenance) or remain the responsibility of the LA (capital expenditure). Both parties will then have dutyholder responsibilities for the repair and maintenance of the premises.

Where the duty is shared, cooperation and communication between all parties is key to the effective management of asbestos-containing materials.

(12) Asbestos records and plans

Before arranging any work on the school premises dutyholders will need to refer to documented information on asbestos that should already be available.

These records include a survey, a register and a management plan.

These documents need active management to make sure that they are kept up to date.

(13) Asbestos survey

An asbestos survey conducted by a qualified asbestos surveyor is an effective way to help you manage asbestos in your premises. The survey should look in all accessible places, including above the ceilings and in floor ducting.

A proper survey provides accurate information about the extent, type and location of asbestos and the condition it is in so that risks can be assessed and priorities set.

It is recommended that you arrange a survey if you suspect there are asbestos-containing materials in your premises.

There are two types of survey:

- Management surveys are undertaken to help manage asbestos-containing materials during the normal occupation, use and maintenance of premises.

- Refurbishment surveys are required where the premises, or part of them, need upgrading, refurbishing or demolishing; or when any work is carried out that might disturb hidden asbestos that had not been previously identified.

The use of accredited or certificated surveyors is recommended.

(14) Assess the risks

The combined material and priority assessment results should be used to establish the priority for those ACMs needing remedial action and the type of action that will be taken.

The assessment should consider the condition of the ACMs, whether they are likely to be disturbed and the action that is necessary to manage the risks.

Note! The priority assessment can only be carried out with the detailed knowledge of the factors that make up the priority assessment algorithm.

The surveyor that carried out the material assessment can help in this process, by obtaining information, which will contribute to the priority assessment, particularly in small or simple premises where information on occupancy and use is straightforward.

This must be done in consultation with the dutyholder, who must provide accurate information on all the activities carried out on the premises

However, such help must be undertaken with caution. It must not be forgotten that is the dutyholder, under CAR 2012, who is required to make the risk assessment using their detailed knowledge of the activities carried out in the premises.

(15) Asbestos register

The asbestos register is a document derived from the asbestos survey. It records where asbestos is located or where there might be asbestos in a shorter more accessible format than the asbestos survey.

If areas have not been accessed during surveys, it has to be assumed that asbestos is present unless there is strong evidence that there is not.

An example **'Asbestos Register'** is shown below. A blank version can be found on page 27.

A record must be kept of all those, and in particular contractors who come to carry out any work on the premises, who are shown the register and any other information about asbestos. See also **section (16) Asbestos Information** on page 14.

A blank **'Asbestos Register Inspection Record'** form can be found on page 31.

EXAMPLE ASBESTOS REGISTER

Name: ABC Ltd

Address: 123 The Avenue, New Town, Countyshire CR1 2DA

Where	Product	How much?	Surface coating	Condition	How easy is the access?	Asbestos type	Comment	Material score	Priority score
Outside									
Roof	Asbestos cement	Whole roof	None	Fairly good	Difficult	Chrysotile?	No sample	1	1
Down-pipe	Asbestos cement	4 x 4 metres	None	One broken	Medium	Don't know = presumed	No sample	5	6.2
Inside									
Plant room	Board panels	43 sq metres	Emulsion paint	Good	Easy	Presumed	No sample	1	1
Plant room	Pipe-insulation	15 metres	Gloss paint	Cracked	Medium	Amosite	Bit that fell off analysed	8	12
Plant room	Gas boiler	Don't know	Metal case	Don't know	Difficult	Presumed	No sample	7	10.5
Plant room	Cement flue from boiler	5 metres	None	Good	Medium	Chrysotile?	No sample	1	1
Plant room	Electrical switch-box	One item	None	Crumbling	Medium	Chrysotile?	No sample	7	10.5
Store	Ceiling tiles	72 tiles, 50x50 cm	Emulsion on lower face	Medium	Medium	Presumed	No sample	5	9.3
Store	Cushion floor tiles	6 x 3 m	Vinyl over asbestos paper	Chipped tile by door	Easy	Chrysotile?	No sample	5	11.3
Store	Above tiles	18 sq metres	Unknown	Unknown	Difficult	Presumed	No sample	1	1
Office 1 fire door	Door	4 sq m	None – board in the door	Good	Medium	Presumed	No sample	1	1
Office 2 fire door	Door – board screwed on	4 sq m	Gloss paint	Medium	Easy	Presumed	No sample	6	11.7
Anneal oven	Asbestos rope	3 m	None	Medium	Easy	Chrysotile?	No sample	7	14.8
Anneal oven	Asbestos gloves	1 pair	None	Poor	Easy	Chrysotile?	No sample	7	16.2
Other									
Delivery van	Brakes	4 sets	None	Fair	Difficult	Chrysotile?	No sample	1	1

Name: J Smith, Building Manager **Date:** 20th December 2013 **Review date:** December 2014

(16) Asbestos Information

The Dutyholder must ensure that information about the location and condition of any asbestos is:

- Provided to every member of staff; and
- Provided to every person liable to disturb it; and
- Made available to the emergency services

The Dutyholder must ensure that anyone in-house or who comes to carry out any work on the premises does not start before they are given information about any asbestos present including its location and condition. The information should be supplied well before any work starts so that the correct precautions can be implemented. See also **section (15) Asbestos Register** on page 12.

(17) Asbestos management plan

The **'asbestos management plan'** contains current information about the presence and condition of any asbestos in the building.

The plan should be written specifically for your school and set out in detail how the risks from asbestos-containing materials will be managed.

Make it easy to read; easy to find when needed and easy to update.

It should set out and include:

- Name of school Dutyholder (this is the Head teacher)
- Name of person completing the Asbestos Management Plan
- Asbestos Survey(s)
- Asbestos Register
- Asbestos Register Inspection Record
- Asbestos Management Audit Report
- Asbestos Action Plan (i.e. plans for any work on asbestos materials)
- Six Monthly Review of the Asbestos Action Plan
- Asbestos Training Register

- Asbestos Remediation Work (i.e. protection, encapsulation, removal) Documentation. This section should contain a copy of all documentation relevant to any asbestos remediation work. For example: ASB5 / ASBNNLW1; Method Statement for the work; copy of the contractors Licence; 4-Stage clearance documents / Site Certification for reoccupation; Reassurance air test results; Waste Consignment notes; etc.

- Corporate Guidance on Asbestos Management in Schools

To assist with this please see the School Asbestos Management Plan Front Sheet. A blank **'Asbestos Management Plan Front Sheet'** can be found on page 27.

This lists the items that must be included in the plan along with a section for the school to enter the name of the school Dutyholder and the person completing the plan.

All school staff, including caretakers, contractors, support staff and teachers must be made aware of the existance of the Asbestos Management Plan and the information it contains.

The school must ensure that the management plan is monitored and reviewed in line with the requirements set out in **section (19) Monitoring & Review Arrangements** on page 18.

(18) Asbestos action plan

If any work on asbestos materials is required the Dutyholder must prepare an action plan that clearly sets out:

- What is going to be done;

- When it is going to be done;

- How it is going to be done – both for any remedial work and for ongoing management action e.g. periodic checks; and:

- Who is responsible for getting the work done

An example **'Asbestos Action Plan'** is shown below. A blank version can be found on page 29.

Example Asbestos action plan

Where	Product	Action	By when	By whom
Outside				
Roof	Asbestos cement	None	N/a	N/a
Down-pipe	Asbestos cement	Replace	February 2014	Building contractor
Inside				
Plant room	Board panels	Check for asbestos	June 2014	Asbestos surveyor
Plant room	Pipe-insulation	Paint over exposed material and cracks	December 2013	Painting contractor – asbestos trained
Plant room	Gas boiler	Phone the maker	February 2014	Gladys, office manager
Plant room	Cement flue from boiler	Check	June 2014	Bert Jones, Site Engineer
Plant room	Electrical switch-box	Replace	June 2014	Electrical contractor
Store	Ceiling tiles	Check for asbestos	June 2014	Asbestos surveyor
Store	Cushion floor tiles	Stick down, check every month	December 2013	Bert Jones, Site Engineer
Office 1 fire door	Door	None	N/a	N/a
Office 2 fire door	Door – board screwed on	Check for asbestos	June 2014	Building contractor
Anneal oven	Asbestos rope	Replace	February 2014	Maintenance company
Anneal oven	Asbestos gloves	Replace – disposal via licensed waste carrier	December 2014	Bert Jones, Site Engineer
Other				
Delivery van	Brakes	Check	June 2014	Garage

Name: J Smith, Building Manager **Date:** 20th December 2013 **Review date:** December 2014

(19) Monitoring & Review Arrangements

Monitoring & review arrangements must cover two main areas:

- The asbestos containing materials (ACMs) themselves; and:
- The arrangements and plan put in place to manage the risk.

The ACMs

Any ACM – identified or suspected – will need to be inspected periodically to check that it has not deteriorated or been damaged.

The decision on how often this needs to be done can be made by thinking about:

- Where the material is;
- How many people work near it;
- Whether it is easy to reach and might get bumped by trolleys or vehicles;
- Whether it might be damaged by vermin or water leakage; or:
- Whether it is out of the way.

It will need to be checked more often if it is in a place where it might get damaged.

Records and drawings must be updated to reflect any changes discovered and the details of the system used to check the condition of the material must be written down in the management plan.

As a minimum, the material should be checked every six to twelve months even if it is in good condition and not going to be disturbed, as it may be accidentally damaged.

The arrangements and plan

There should be periodic checks to make sure that all the arrangements for asbestos management are working and that people are fully aware of what they should be doing to comply with the duty to manage.

Arrangements must be reviewed and changes made, especially when:

- New staff are brought in
- Different sorts of work in the premises are started; or
- There is a change in the condition of the ACMs.

As a minimum, the arrangements should be reviewed every six months even if there have not been any changes.

The extent of the review will depend upon the size and complexity of the premises however the following should always be considered when conducting a review of an asbestos management plan.

1. Any visual changes to the condition of or damage to the known ACM's on the asbestos register
2. Any changes to the encapsulation of ACM's
3. Any change of use of rooms where ACM's are present
4. Any changes to the schools maintenance regime
5. Any change to the schools Dutyholder i.e. change of Head teacher
6. Any changes required to the asbestos register through any ACM's being identified through new surveys
7. Any changes required to the asbestos register through any ACM's being encapsulated or removed
8. That actions identified in the schools Asbestos Action Plan have been implemented or planned for
9. That actions identified in the schools Asbestos Management Audit Report have been implemented or planed for
10. That asbestos awareness inductions are being given to contractors
11. That school staff are aware of the ACM's within the school
12. That ACM visual inspections are being conducted at the required frequencies and recorded and that the inspection frequencies are appropriate
13. That Training requirements have been met, planned for and are still adequate
14. That copies of the full documentation for any asbestos removal works are kept in the schools asbestos management file

The details of the review must be recorded on the School Asbestos Action Plan Six Monthly Review and must include confirmation that the arrangements are still satisfactory or whether any changes have been made.

Everyone who needs to know must be informed of any changes made.

A copy of the **'School Asbestos Action Plan Six Monthly Review'** form can be found on page 30.

(20) Asbestos training

Under the Control of Asbestos Regulations 2012 information, instruction and training is required for anyone whose work could foreseeably expose them to asbestos, and those who supervise them.

This includes staff and maintenance people who may become exposed to asbestos while carrying out their normal everyday work, such as entering boiler rooms and plant rooms where asbestos is present, or changing light fittings in asbestos-tiled ceilings, or who may come into contact with or damage asbestos materials within the building fabric.

Any training needs to be appropriate for the work and the roles undertaken by individuals.

- Asbestos awareness training is for people who are liable to disturb asbestos while carrying out their normal everyday work, and for those who manage them. This will include caretakers and maintenance staff, and could include building managers, bursars and heads.

  NOTE! Taking an asbestos awareness training course does not mean that an individual can work on asbestos materials.

- Workers who intend to remove or carry out work with non-licensed materials such as asbestos cement, asbestos gaskets, and asbestos floor tiles, must have additional training in the type of work being undertaken.

- Higher risk materials including asbestos insulation, asbestos coatings and asbestos insulation board must only be repaired or removed by HSE licensed contractors.

Most school staff are not directly involved in managing the buildings or in carrying out repair or maintenance work, however staff still need to be aware of the potential hazards.

All staff should be instructed not to disturb or damage asbestos-containing materials, for example, by allowing work to be pinned to walls.

They should also report damage to school fixtures or fittings that could lead to the release of asbestos fibres, for example, damage to ceiling or floor tiles, or to column seals in system-built schools.
Schools must ensure that an asbestos training register is completed by all contractors and individuals liable to disturb asbestos.

An **'Asbestos Training Register'** can be found on page 33.

(21) Consequences of non–compliance

Failure to comply with the Control of Asbestos Regulations 2012 is a criminal offence. The Health and Safety Executive (HSE) investigates incidents where dutyholders fail to manage the risks and takes enforcement action where appropriate.

The following case studies outline some of the consequences that have ensued when dutyholders either failed to seek competent advice or ignored advice in the procurement of minor works – leading to contractors, and others, being exposed to risks.

- **Unsafe removal led to exposure, prosecution and fines**

  The unsafe removal of asbestos insulation boards at a large independent school led to several people being exposed to asbestos fibres.

  HSE prosecuted the school and the director of the company responsible for the refurbishment project, after an investigation found they had failed to identify and prevent the risk of asbestos exposure.

  The HSE investigation found that over an 18-month period, from the initial design stages through to the construction work, there was inadequate planning and a failure to carry out a full asbestos survey. This was despite the fact that a sample taken from the building had identified the presence of asbestos.

  The school was fined £60,000 and ordered to pay £13,000 in costs. The director was fined £10,000 with costs of £6000.

- **Negligence and civil law**

  Under the common law, organisations have a duty of care to others who may be affected by their activities. Individuals have sued for damages using the civil law when they were injured as a result of another person's negligence.

  A local authority was required to pay £250,000 to a victim's family for negligence in asbestos management many years previously, when the victim was a pupil at a local authority school.

- **Costs of decontamination**

  The financial consequences of having to carry out decontamination can be extreme, and there can be a negative impact on pupils' education.

  In one school, a lab technician installed an IT cable through a ceiling void, putting holes through fire barriers and walls, and contaminating the majority of ceiling voids throughout the building. It was nine months before the exposure was spotted by a surveyor. The clean-up required new ceilings and lighting to be installed, and cost £280,000.

  Another school arranged an electrical re-wiring over the summer. On observing the contractors with unsealed bags of asbestos waste, the school's site manager contacted an experienced asbestos consultant. Asbestos contamination had spread throughout the school, affecting everything from computers to test tubes, files and records and pupils' coursework.

At the start of the autumn term, 1000 pupils had to be found temporary accommodation; the school did not reopen until the following summer term. The school and council incurred costs of £4.54m as a direct result of the contamination. The HSE prosecuted the contractor.

(22) Asbestos – what to do if things go wrong

If something goes wrong and you find you have been exposed to asbestos fibres, or you damage asbestos-containing materials you should:

- stop work immediately.
- ensure that staff and pupils are not able to access the area and do not remove any personal possessions
- get advice from an asbestos expert about decontamination of people and premises, and take necessary remedial action.
- In consultation with the asbestos expert, notify the Health and Safety Executive (HSE).

People who have been exposed to asbestos are understandably anxious about the possible effects on their health. A slight exposure is unlikely to cause asbestos disease but the risks are greater for prolonged or high levels of exposure.

(23) Asbestos – the importance of collaboration

Day-to-day operational lead for health and safety is normally delegated to the senior management team, who have a key role in making sure risks are managed effectively within their school - particularly when any work is undertaken that may damage or disturb asbestos.

Good communication between the management team and staff is critical to managing the risks, whether the work involves identifying and reporting damage, undertaking minor building repairs, or overseeing major refurbishment.

When any work is carried out on school buildings, collaboration between the school and contractors is vital. Particular attention must be given to ensuring that contractors are aware of known and presumed locations of asbestos and that effective lines of communication between the school and those responsible for the contractors are maintained throughout the work.

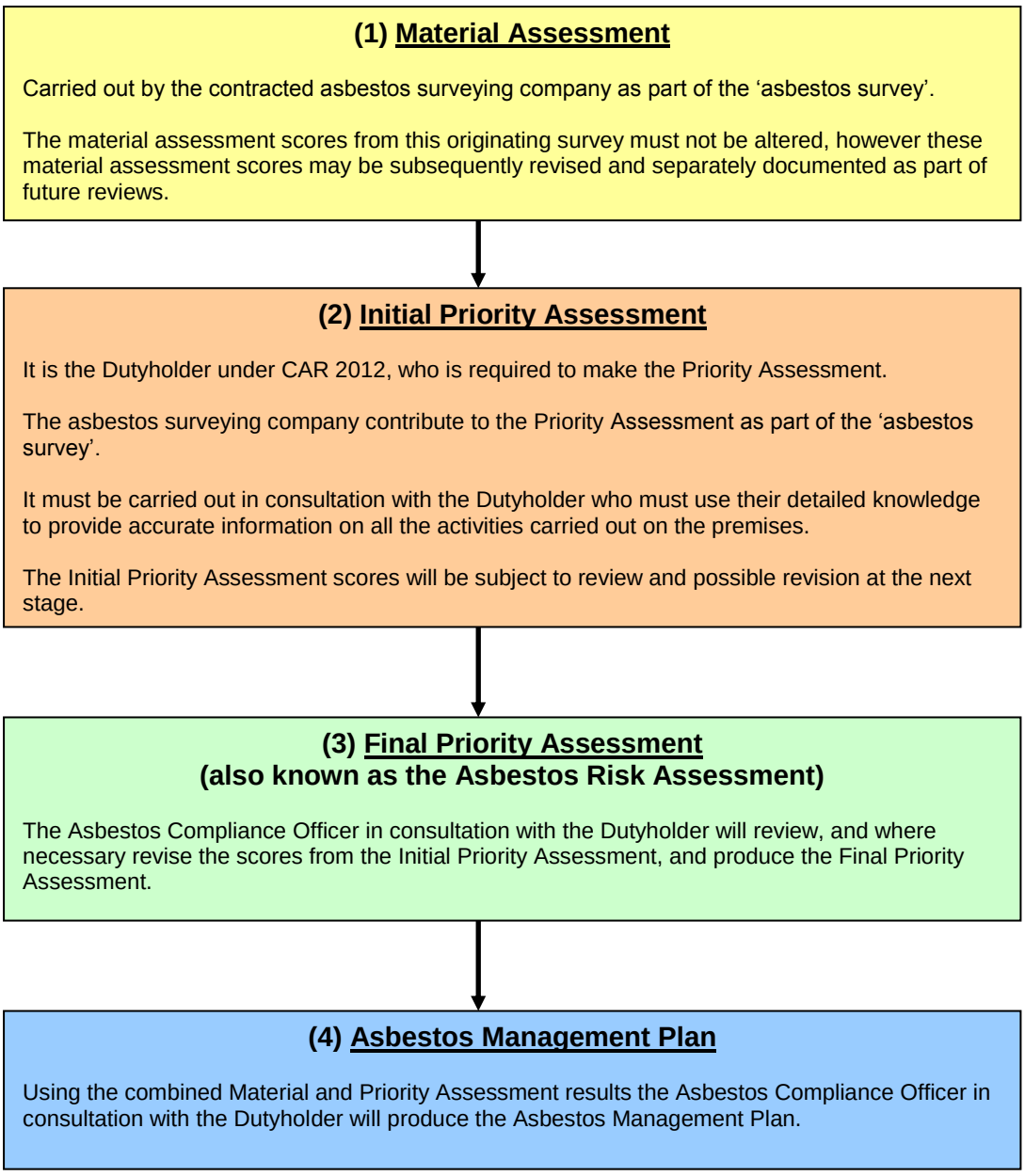
(24) Asbestos Management Audit Process

The Asbestos Compliance Officer (ACO) will visit the school and carry out a review of the school's asbestos management procedures and documentation. Following the review the ACO will produce an asbestos management audit report and asbestos management plan.

The audit report will contain findings from the visit and, where appropriate, actions that must be completed within given timescales. Further details can be found in section (21) on the following page.

NOTE! The Asbestos Management Audit Process must be done in consultation and collaboration with the Headteacher, as they are the dutyholder and the person with responsibility for asbestos management within the school.

The flowchart below sets out the overall process.



(25) Guidance on the Asbestos Audit Report

Standard Met

The 'Standard Met' column is spilt into four parts as follows:

'Y' = Yes	The School has met the required standard and level of compliance for the area concerned.
'P' = Partially Met	The School has partially met the required standard and level of compliance for the area concerned but further work is required that must be completed within a given timescale.
'N' = No	The School has not met or achieved the required standard or level of compliance and a Priority Ranking or Specific Completion Date will be assigned in the end column.

Priority Ranking & Specific Completion Date

If a school has not met or achieved the required standard or level of compliance a recommendation will be given in the 'Action Required/Comments' column of the audit report.

A Priority Ranking or Specific Completion Date will be entered in the 'Priority A/B/C' column, which sets out the timescale for each action to be completed.

Please note that the timescales commence from the day of the visit and these are the **maximum** time limits for carrying out the recommendations and therefore the school are advised to complete them as early as possible.

Priority A – to be completed within 4 weeks

This is assigned in any of the following cases:

- Where a failure to meet or achieve the required standard or level of compliance results in a breach of statutory duty giving rise to an immediate threat to people, property or process;
- Where there exists an unacceptable level of risk if remedial action is not taken;
- Where there has been a failure to complete any item previously assigned as Priority B.

Priority B – to be completed within 8 weeks

This is assigned in any of the following cases:

- Where a failure to meet or achieve the required standard or level of compliance will result in a breach of statutory duty giving rise to an imminent threat to people, property or process if action is not taken within the eight week completion period;
- Where the level of risk will become unacceptable if remedial action is not taken within the eight-week completion period;
- Where there has been a failure to complete any item previously assigned as Priority C.

Priority C – to be completed within 12 weeks

This is assigned in any of the following cases:

- Where a failure to meet or achieve the required standard or level of compliance will result in a breach of statutory duty if action is not taken within the twelve-week completion period;
- Where the level of risk will become unacceptable if remedial action is not taken within the twelve-week completion period;
- Any defect identified at the time of the inspection that does not fall into the Priority A or B category.

Important Note:

In certain circumstances a **Priority A** recommendation will be the starting point for further actions going into the future. In this case each additional action will be assigned its own completion date or priority as appropriate.

For example, an audit in a school has identified that risk assessments have not been carried out and no one has received risk assessment training.

In such a case there is little point in trying to complete the assessments until those responsible have undertaken the training and therefore the defect and recommended actions would be set out as follows:

> ***Risk Assessment:***
>
> *During the visit it was identified that the school did not have any completed risk assessments and that those staff with responsibility for carrying out assessments had not received appropriate training.*
>
> *It is therefore recommended that the following actions be carried out:*
>
> ***(i)*** *School to ensure that all those with responsibility for carrying out risk assessments are booked onto the next available Introduction to Risk Assessment training course.*
>
> ***Priority A***

(ii) *Staff to attend the Introduction to Risk Assessment training course after which the school is to ensure risk assessments are carried out and recorded for all significant hazards identified within the school.*

Priority C

Item **(i)** is given a **Priority A** as there is no reason why the training cannot be booked within the four-week priority A completion period whereas Item **(ii)** is given a **Priority C** in order to take into account the availability of the training and the work required to complete the assessments afterwards.

Specific Completion Date

A specific date will be given for the completion of any remedial action in cases where the failure to meet or achieve the required standard or level of compliance results in an immediate danger or threat to people, property or process or there exists an unacceptable level of risk to people, property or process if action is not taken.

Information

The letter **"i"** stands for Information and when entered in the Priority Action column, indicates that in order to assist the school in completing a particular priority, further information is available in the health and safety guidance document that accompanies each report.

Follow-up Procedure

In line with corporate auditing protocols the Safety Section **will** contact you in order to confirm that actions assigned a 'Priority A' ranking and/or a 'specific date' have been completed and you may be asked to provide evidence of this.

In addition the Safety Section **may** contact you in order to confirm that actions assigned a Priority B and/or C have been completed and you may be asked to provide evidence of this.

SCHOOL ASBESTOS MANAGEMENT PLAN

This asbestos management plan contains information about the presence and condition of asbestos materials in the school and sets out in detail how the risks from these materials will be managed.

It contains the following sections:

Section No.	Title
1	**Asbestos Survey(s)**
2	**Asbestos Register**
3	**Asbestos Register Inspection Record**
4	**Asbestos Management Audit Report**
5	**Asbestos Action Plan (i.e. plans for any work on asbestos materials)**
6	**Six Monthly Review of the Asbestos Action Plan**
7	**Asbestos Training Register**
8	**Asbestos Remediation Work Documentation**
9	**Corporate Guidance on Asbestos Management in Schools**

Asbestos Management Plan completed by:	**Asbestos Management Plan received by school Dutyholder:**
Name:	**Name:**
Signature:	**Signature**
Job Title:	**Job Title:**
Date:	**Date:**

SCHOOL ASBESTOS REGISTER

Premises Name:

Address:

Item No.	Where	Product	How much?	Surface coating / protection details	Condition	How easy is the access?	Asbestos type	Comment (sampled / presumed)	Material score	Priority score

Name: _____ Date: _____ Review date: _____

SCHOOL ASBESTOS ACTION PLAN

Item No.	Where	Product	Frequency of Inspection	Action	By when	By whom	Date Completed

Name: _____ Date: _____ Review date: _____

SCHOOL ASBESTOS ACTION PLAN SIX MONTHLY REVIEW

Review Date: _____ Name of reviewer: _____

PLEASE WRITE IN THE BOXES BELOW ANY CHANGES, REVISIONS OR UPDATES TO THE ABOVE ACTION PLAN

Item No.	

ASBESTOS REGISTER INSPECTION RECORD

CONTRACTOR / MAINTENANCE WORKER

School:

Responsible Building / Facilities Manager ……

IMPORTANT – PLEASE READ

***** I confirm that the contents of the Asbestos Management Plan including Asbestos Survey Information for the above building have been brought to my attention. The limitations of the Asbestos Survey Information has been explained to me and I will cease work immediately in the event of suspecting any Asbestos Containing Materials discovered in the course of my work and bring it to the attention of the Building / Facilities Manager above immediately.

IF YOU UNDERSTAND THE INFORMATION AND DUTIES AS EXPLAINED BY THE RESPONSIBLE PERSON / LOCAL DUTY HOLDER THEN COMPLETE THE FOLLOWING:

Date	Name of Company	Work being carried out	Name of person who has inspected the asbestos register	Signature

Date	Name of Company	Work being carried out	Name of person who has inspected the asbestos register	Signature

ASBESTOS TRAINING REGISTER

All contractors and individuals who are liable to disturb asbestos during their normal work should be trained so that they can recognise asbestos containing materials and know what to do if they come across them.

The training needs to be appropriate for the work and the roles undertaken by individuals. There are three types of asbestos training:

- Awareness training
- Training for work with asbestos that does not require a licence from HSE
- Training for asbestos work that does require a licence from HSE.

ALL contractors and individuals must indicate the type of training they have received and confirm that it is suitable for the work they intend to undertake.

Awareness training (Category A)

This training is for contractors and individuals who are liable to disturb asbestos while carrying out their normal everyday work, or who may influence how work is carried out in order that they know how to avoid the risks and how to protect themselves.

For example: General maintenance workers; Electricians; Plumbers; Carpenters & Joiners; Painters & decorators; plasterers; Construction workers; Roofers; Shop fitters; Gas fitters; Heating & Ventilation Engineers; Demolition workers; Telecoms Engineers; Fire / Burglar alarm installers; Computer installers; Cable installers; Architects; Building surveyors etc.

Note! This list is not exhaustive! There are other trades / occupations that are liable to disturb asbestos.

Important – Awareness training is not enough if you plan to carry out any work with asbestos containing materials.

Training for asbestos work that does not require a licence ('non-licensable' asbestos work) (Category B)

This training is for those contractors and individuals who plan to carry out any work with asbestos that does not require a licence and who may knowingly disturb lower risk asbestos containing materials.

It must be provided in addition to asbestos awareness training and should be job specific.

Contractors and individuals who may need this training include those already listed above under asbestos awareness training, such as: General maintenance workers; Electricians; Plumbers; Carpenters & Joiners; Painters & decorators; plasterers; Construction workers; Roofers; Shop fitters; Gas fitters; Heating & Ventilation Engineers; Demolition workers; Telecoms Engineers; Fire / Burglar alarm installers; Computer installers; Cable installers; Architects; Building surveyors etc.

And who carry out such tasks as:

- Drilling holes in asbestos materials (including for sampling and analysis purposes)
- Laying cables in areas containing undamaged asbestos materials
- Removing asbestos containing floor tiles
- Cleaning or repairing asbestos cement sheet roofing or cladding
- Removing gaskets and ropes seals whilst working on boilers

Note! The above list is not exhaustive! There are other trades / occupations that may plan to carry out work with asbestos that does not require a licence and who may knowingly disturb lower risk asbestos containing materials.

Important – This form of training on its own is not sufficient for carrying out licensed work.

Training for asbestos work that does require a licence (‘licensed asbestos work') (Category C)

This is for those working with asbestos which, is licensable such as asbestos coating, asbestos insulation or asbestos insulating board

Only licensed contractors employing suitably trained workers, using appropriate respiratory protective equipment and who are under suitable medical surveillance can undertake licensed asbestos work.

This type of training is therefore required for Operatives, Supervisors and Managers working for a licensed contractor.

ASBESTOS TRAINING REGISTER

Date	Name of contractor / individual (PRINT)	Training Undertaken			PRINT NAME	Signature	Witnessed by
		Asbestos Awareness	Non-licensable asbestos work	Licensed asbestos work			