

Facilities Management Service

Asbestos Management Policy

Coventry City Council Buildings



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1.0 Purpose

This Policy has been produced to ensure the effective management of all asbestos containing materials (ACMs) across Coventry City Councils' (CCC) property portfolio; where the Council are deemed the 'Duty Holder' under Regulation 4 of the Control of Asbestos Regulations (CAR) 2012, and to reduce asbestos related risks to as low a level as is reasonably practicable.

The Council are the duty holder in Council owned and maintained properties or where the Council have the maintenance responsibility for the property (e.g., through a full repairing lease). It also covers all employees and others who work in or visit those properties.

This Policy, and the associated Asbestos Management Procedural document also sets out all procedures required to ensure all asbestos works procured and/or organised by the Council are properly scoped, serviced and managed in accordance with legal requirements and best practice.

2.0 Further References and Associated Documents

The principal legislation and regulations to which the Council aims to discharge its legal duties are:

- Health & Safety at Work etc. Act 1974
- Control of Asbestos Regulations 2012
- Management of Health & Safety at Work Regulations 1999
- The Hazardous Waste (England and Wales) Regulations 2005
- Construction (Design and Management) Regulations 2015
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995
- The Workplace (Health, Safety and Welfare) Regulations 1992
- The Health and Safety (Safety Signs and Signals) Regulations 1996
- The Defective Premises Act 1972
- The Control of Substances Hazardous to Health Regulations 2002.

Additional legislation/regulations, Approved Codes of Practice and Guidance Notes are:

- CCC's Asbestos Management Procedures
- HSE ACOP L143 - Managing and Working with Asbestos
- HSE INDG223 - Managing asbestos in buildings: A brief Guide
- HSE HSG264 - Asbestos: The Survey Guide
- HSE HSG248 – Asbestos: The Analyst Guide
- HSE HSG210 - Asbestos Essentials
- CCC's Contractor Management Guidance
- CCC's Health and Safety Policy.

3.0 Statement of Intent

CCC shall ensure that, as far as is reasonably practicable, all health and safety issues relating to asbestos are satisfactorily managed and controlled to thereby minimise the risk to employees and others, of the exposure to asbestos within the Councils premises.

CCC shall also ensure that all relevant building managers and colleagues also have a 'duty of care' for their property and the health and safety of themselves and others.

4.0 Policy Statement

The Council's Asbestos Policy has been produced in accordance with the Council's Health and Safety Policy, all current health and safety legislation and applicable regulations, to ensure that all relevant health and safety issues relating to asbestos are satisfactorily managed and controlled, thereby minimising risk to employees and others, of the exposure to asbestos.

The Council is committed to protecting the health, safety and welfare of its employees and others who may be affected by the Council's undertakings. It is essential therefore that everyone who works for; or undertakes work on behalf of, the Council adheres to the requirements of this Policy and the associated asbestos management procedures.

This Policy will also apply to external consultants, contractors, subcontractors and/or suppliers engaged by the Council.

Coventry City Council's Policy on asbestos is to:

- Ensure the prevention of exposure to risks associated with asbestos containing materials (ACMs)
- Ensure that any ACMs that may be present in any of its buildings are maintained in a condition to prevent the possibility of any harm to health occurring
- Promote awareness of the risks from ACMs and the Council's Management Procedures through training and induction of relevant staff
- Provide regular training/refresher training for key staff involved in the delivery of this Policy and associated procedures
- Provide adequate resources to ensure the provision of appropriate information, instruction, and training
- Ensure a commitment to comply with all relevant asbestos legislation, Approved Codes of Practice, Health and Safety Executive Guidance Notes and to commit to the safe disposal of any asbestos waste in accordance with the appropriate legislation
- Ensure that all Council properties built before 2000 are surveyed to identify any ACMs that may be present therein and to prepare and maintain an Asbestos Register for these buildings. This Register will be reviewed on a regular basis and updated after any remedials and/or removal works have been undertaken or further ACMs located
- Produce, implement, and review an effective asbestos management plan (AMP) for all relevant properties
- Ensure that an appropriate system implemented and maintained for the management of all ACMs identified in the Register for relevant properties. Such a system is to be capable of recording the risk, the needs, and priorities for treatment and/or removal
- Ensure that all relevant CCC employees, contractors and sub-contractors engaged to carry out work on any of the Council's buildings are provided with the Register and all relevant asbestos information, prior to any building/refurbishment/maintenance works are carried out
- Ensure that information regarding the presence of asbestos is contained in tender documentation as may be appropriate
- Ensure Licensed Contractors and/or Sub Contractors carry out ALL Asbestos Major Works in accordance with HSE recommendations
- Ensure all Non – Licensed Contractors carrying out Asbestos Minor Works are trained in safe working procedures and have appropriate insurance cover for the work being carried out
- Ensure that relevant staff of the Council and contractors have appropriate training in this Policy and these Procedures
- Regularly review the Asbestos Management Policy and Procedures.

The procedures to comply with this Policy are detailed in the accompanying Asbestos Management Procedures appendices.

5.0 Roles and Responsibilities

Coventry City Council has responsibility for compliance with The Health and Safety at Work etc. Act (1974) and all associated legislation. This includes specific legislation relating to asbestos, as set out in Section 2.0.

All persons having specific roles for the management of asbestos and for the safe working practises within relevant CCC premises must comply with the relevant responsibilities contained in the Asbestos Management Procedures Document, which must be read in conjunction with this Policy.

The Chief Executive is the Statutory Duty Holder and has overall responsibility for ensuring compliance with all current asbestos regulations, guidance notes and codes of practise and this Policy.

All relevant Directors are the Responsible CCC Directors and the details of these specific roles are described in the AMP document.

Directors will appoint Responsible Managers, which are the Head of each relevant Service who in turn will appoint a Deputy Responsible Person. Deputy Responsible Person(s) are usually the Manager of each department.

Responsibility for day-to-day activities is delegated to the Site Responsible Person/Building Manager (Local Duty Holder) as specified by each individual site management arrangements.

It is the responsibility of all Service Heads to assign a Site Responsible Person and a Deputy for each of their premise(s) in writing and to ensure that those persons are fully aware of their role in relation to the safe and correct management of ACMs.

Where CCC employees occupy premises that are not owned by the Council the duty to manage may be the responsibility of the landlord or other occupants. Confirmation will be sought to ensure that there are adequate control measures in place to minimise all potential risks from asbestos in these properties. Service Areas entering into such a property lease agreement must ensure that there are clear responsibilities for an ongoing Asbestos Management Plan.

It is recognised that certain CCC establishments do not use the services of the Council's Property Services & Development Division as an agent for building projects and repairs/maintenance works and directly employ contractors to undertake this work on their behalf. In this situation, the Site Responsible Person(s) is responsible for the compliance with all relevant regulations/legislation and CCC Asbestos Management Policy and Procedures.

6.0 Organisation and Arrangements

All CCC staff must refer to, and comply with this Policy and the accompanying CCC asbestos management procedural document which has detailed compliance arrangements with regards to:

- Control, communication, competence, and co-operation requirements
- Risk assessments and actions taken to prevent and minimise against risk of asbestos exposure
- Planned building works and contractor management
- Training
- Record keeping
- Maintenance and repair work(s)
- Ongoing monitoring and further asbestos survey inspections

- Actions in event of asbestos being discovered or accidentally damaged
- Disposal arrangements
- Audits and reviews.

7.0 Prohibition on Staff Handling or Working on Asbestos

Unless properly trained, competent and insured to do so, no Council staff will be permitted to handle or work with ACMs.

8.0 Management of Asbestos and Building Works

Historically, asbestos management (Type 2) surveys have been carried out on all corporate operational and LEA school properties built prior to 2000. More recent asbestos management surveys have been carried out on corporate operational properties during 2019 and 2020 which supersede the older management survey reports.

The findings of all surveys undertaken will be used to prepare a register of known, presumed and suspect ACMs (including their location, extent, and condition along with details on how best to manage/remediate the material) in all relevant premises. This register will be reviewed following regular re-inspections or when an ACM has been removed or remediated. The register will also be amended and/or reviewed if further ACMs are found during more intrusive refurbishment surveys.

Refurbishment and/or Demolition surveys are also required if the fabric of the building is to be disturbed in any way and the management survey/asbestos register does not contain sufficient information to produce an appropriate asbestos risk assessment prior to works commencing.

The asbestos management procedure document details how CCC will continue to effectively manage all ACMs within all relevant properties and how any works that may disturb the fabric of the buildings are correctly risk assessed prior to works commencing.

9.0 Policy Review

The Council will review this policy and management procedure document every 3 years, more regular reviews will be considered where, for example, there is a need to respond to new legislation/policy guidance.

Individual 'local' Asbestos Management Plan documents will be reviewed annually.

Regular audits will take place within corporate properties to ensure that the management plan is being implemented and the relevant procedures have been communicated to all relevant staff and other building users.

Audits will be undertaken on other departments within CCC, such as Commercial, Project Delivery and Repairs and Maintenance to ensure adherence to the Policy and the associated procedures where it is applicable.

Regular audits will also be undertaken on premises where the Council are not the *main* duty holder. The results from these audits will be provided to the appropriate Heads of Service, e.g., Head of Education Services.

10.0 Key Contacts

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11.0 Document Control

Version	Governance/ Sign off route	Author	Notes	Review Date
2.0	D Peters	Yvette Liening	Effective from: November 2021	November 2024