

## Facilities Management Service

---

# Asbestos Management Procedure

---



## Contents

<b>1.0 Purpose</b>	<b>3</b>
<b>2.0 Introduction</b>	<b>3</b>
2.1 Asbestos in Buildings – Exposure and Health Effects	3
<b>3.0 Roles &amp; Responsibilities</b>	<b>3</b>
3.1 CCC Chief Executive – Statutory Duty Holder	3
3.2 Responsible CCC Directors	3
3.3 Director of Property Service and Development	4
3.4 Responsible Managers	4
3.5 The Head of Occupational Health, Safety and Wellbeing	4
3.6 Deputy Responsible Person(s)	4
3.7 Project Delivery	5
3.8 Commercial Property	6
3.9 Education	6
3.10 Compliance and Surveying	7
3.11 Repairs & Maintenance Commercial	7
3.12 Site Responsible Persons	7
3.12.1 Corporate Operational Properties – Site Responsible Person(s)	8
3.12.2 Educational Properties	8
3.12.3 Commercial Properties and Other Relevant Properties	9
3.13 Compliance & Surveying Team Project Managers & Area Surveyors	9
3.14 Senior Asbestos Officer (SAO)	10
3.15 Technical Asbestos Support	10
<b>4.0 Asbestos Management Surveys</b>	<b>11</b>
4.1 Corporate Operational	11
4.2 Commercial	11
4.3 Education	11
4.4 Repairs & Maintenance	12
4.5 Project Delivery	12
<b>5.0 Asbestos Management Plan</b>	<b>12</b>
5.1 Corporate Operational Properties	12
5.2 Local Authority Education Properties	12
5.3 Commercial Properties	12
5.4 Priorities for Action	13
5.5 Priority Action Table	13

<b>6.0 Corporate Operational Emergency Procedures – Accidentally Damaged or Disturbed</b>	<b>14</b>
6.1 Unexpected discovery of asbestos or accidentally damaged ACMs	14
6.2 Accidental release of asbestos	14
<b>7.0 Reactive Maintenance Work</b>	<b>15</b>
<b>8.0 Planned Building/Maintenance Work</b>	<b>16</b>
<b>9.0 Work with Asbestos Materials</b>	<b>16</b>
<b>10.0 HSE Asbestos Work Decision Flowchart</b>	<b>17</b>
<b>11.0 Repairs and Maintenance</b>	<b>19</b>
<b>12.0 Communication, Information &amp; Training</b>	<b>20</b>
<b>13.0 Records</b>	<b>20</b>
<b>14.0 Policy Review</b>	<b>20</b>
<b>15.0 Key Contacts</b>	<b>21</b>
<b>16.0 Document Control</b>	<b>21</b>
<b>Appendices</b>	<b>22</b>
1.0 Material and Priority Assessment Score Algorithms	22
2.0 HSE EM1 Flowchart – Discovery or Accidental Disturbance of ACMs	25

## Abbreviations

ACMs	Asbestos Containing Materials
CAR 2012	Control of Asbestos Regulations 2012
CCC	Coventry City Council or The Council
HSE	Health and Safety Executive
KPI	Key Performance Indicators
LAMPs	Local Asbestos Management Plans
LEA	Local Education Authority
LW	Licensed Work
NNLW	Notifiable Non-Licensed Work
NLW	Non-Licensed Work
PM	Project Manager
PO	Project Officer
PPE	Personal Protective Equipment
RIDDOR	Reporting of Injuries, Diseases and Dangerous Occurrences Regulations
R&M	Repairs & Maintenance
RPE	Respiratory Protective Equipment
SAO	Senior Asbestos Officer
UKAS	United Kingdom Accreditation Service
UKATA	United Kingdom Asbestos Training Association

## 1.0 Purpose

The purpose of this procedural document is to further explain what is set out and required in the CCC Asbestos Management Policy and what actions are to be undertaken to ensure compliance with the Control of Asbestos Regulations (2012). This document must be read in conjunction with the Asbestos Management Policy.

## 2.0 Introduction

This document complements the Coventry City Council's (CCC) Asbestos Management Policy by adding further details to the roles, responsibilities and procedures for the management and control of asbestos in buildings.

### 2.1 Asbestos in Buildings – Exposure and Health Effects

The presence of Asbestos Containing Materials (ACMs) in itself - does not constitute a danger. If existing ACMs are in good condition and are not likely to be damaged, they may be left in place; their condition monitored and managed to ensure they are not disturbed. However, an isolated accidental exposure to asbestos fibres for a short duration is extremely unlikely to result in the development of asbestos related diseases.

Regular exposure – even at relatively low levels – can present a risk. As well as people employed in the building trades, inadvertent exposure (and consequent risk) can occur in other groups of people e.g. installers of burglar alarms, smoke detectors, etc.

Ongoing building maintenance and repair/refurbishment contracts will also occur, and it is important, therefore, to have in place a management system which minimises the potential for exposure to asbestos.

Regulation 4 of the Control of Asbestos Regulations (2012) requires that all 'duty holders' in non-domestic properties undertake a risk assessment to establish the presence, if any, of ACMs. If ACMs (or no access areas) are identified, then the 'duty holder' must produce and implement a management plan to ensure that these ACMs are effectively managed, removed if of a higher risk; and that this information is effectively communicated and emergency procedures are in place in case of accidental damage.

## 3.0 Roles & Responsibilities

### 3.1 CCC Chief Executive – Statutory Duty Holder

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.

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

The Chief Executive requires that the Directors provide regular information on health and safety performance regarding the services of the Council under their control.

The Chief Executive will delegate, in writing, the monitoring, reviewing and auditing as required under the Asbestos Management Policy to the 'Responsible CCC Directors' and the 'Responsible Person(s)'.

### 3.2 Responsible CCC Directors

**All** CCC Directors will appoint in writing Responsible Managers, and in conjunction with them, will have responsibilities which will include ensuring all relevant Site Responsible Persons (Local Duty Holders) and CCC employees who plan, manage, or implement works that may

involve asbestos risk have appropriate training and that sufficient resources are available for the ongoing safe and effective management of asbestos materials within their premise(s).

These Directors will also ensure that a named Site Responsible Person (Local or Main Duty Holder) has been nominated, that this person is fully aware of their duties and the details are provided to the Asbestos Team for inclusion within the Local Asbestos Management Plans, where provided by the Council.

Local Education Authority (LEA) occupied buildings, i.e., schools and the communal areas of Commercial premises are to produce, implement, maintain and audit their own Asbestos Management Plans.

Whilst the Duty to Manage largely refers to the built environment; it does also include any land that may contain or be contaminated with asbestos materials.

Along with the above responsibilities the following directors are also more specifically responsible for the following outlined in the sections below.

### 3.3 Director of Property Service and Development

The Director of Property Service and Development 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 CCC operational buildings. They shall also have overall responsibility for the nomination of named Site Responsible Person(s) for each relevant corporate operational premise, which will be provided to the Asbestos Team for inclusion within the Local Asbestos Management Plans.

### 3.4 Responsible Managers

In conjunction with the Responsible CCC Directors, Responsible Managers shall have the responsibility for the full implementation of this policy and for the allocation of resources for the effective management of asbestos risk within CCC properties.

The Responsible Manager will appoint in writing Deputy Responsible Person(s) and in conjunction with them, have responsibility which includes that all relevant Site Responsible Person(s) and CCC employees who plan, manage or implement works that may involve asbestos risk have appropriate training and ensure that sufficient resources are available for the ongoing safe and effective management of asbestos materials within their premise(s).

The nominated Site Responsible Person(s) must be made fully aware of their duties by the Responsible Manager/Deputy Responsible Manager and their contact details are provided to the Asbestos Team for inclusion within the Local Asbestos Management Plans (LAMPs) where provided by the Council. Ensure appropriate handover is conducted between outgoing and incoming Site Responsible Person and their Deputy of operational properties.

### 3.5 The Head of Occupational Health, Safety and Wellbeing

The Head of Occupation Health, Safety and Wellbeing is responsible for reporting any incident of suspected asbestos exposure and carry out any required investigation. Also, where appropriate, ensuring the correct reporting of incidents under RIDDOR (Reporting of Injuries, Diseases and Dangerous Occurrences Regulations).

### 3.6 Deputy Responsible Person(s)

The following roles are deemed Deputy Responsible Persons; this list is not exhaustive:

- Compliance and Surveying Manager

- Repair Maintenance Commercial Manager
- Manager of Commercial Property
- Project Delivery Project Manager(s)
- Education Manager(s)
- Adult and Children's Services Manager(s)
- Post and Mail Room Manager(s)
- Highways and Transport/Street Scene Manager(s)
- Other Service Areas Manager(s).

Deputy Responsible Managers will ensure that all relevant Site Responsible Person(s), Project Managers/Officers, Maintenance Operatives, Surveyors and CCC employees who plan, manage, or implement works that may involve asbestos risk; or who have a 'duty to manage' asbestos in premise(s), undertake appropriate and sufficient training and have access to sufficient resources to undertake their duties in accordance with the policy and all relevant regulations.

**The Deputy Responsible Persons are employees within CCC with whom the duty is placed to:**

- Ensure that any contractor employed to work on behalf of CCC on confirmed or suspected asbestos containing materials are fully competent and trained to undertake such work and work in accordance with this document and regulations. Licensed asbestos work must be undertaken by a fully HSE Licensed Contractor. All contractors must carry the appropriate insurance.
- Ensure that adequate resources are available to undertake all work that involves the management of asbestos and all planned/reactive works that may involve asbestos risk and highlight to the Responsible Person any additional resources required.
- Manage asbestos survey, testing, remedial and risk minimisation programmes where relevant.
- Ensure that there are competent and trained employees within CCC to support this role and that these employees 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.
- Ensure Local Asbestos Management Plans and asbestos registers are available for each relevant property and that these plans/registers are implemented, maintained and updated regularly.
- That no work is undertaken on asbestos materials or that may disturb hidden ACMs unless the employee/contractor is appropriately trained and that the correct Risk Assessment and Control Measures are utilised.

**Other and more role specific responsibilities are highlighted in the following sections.**

### 3.7 Project Delivery

- Ensuring that before any feasibility work or project work is commenced the asbestos register is consulted and information obtained on any asbestos containing materials within the premises.

- If there is no asbestos register for the premises and/or insufficient asbestos information, then the Head of Project Delivery is responsible for ensuring suitable asbestos surveys are carried out as required prior to project works commencing.
- Ensuring that where asbestos is identified within a development project, appropriate actions are undertaken to remove all asbestos in accordance with the requisite standards.
- Ensure that all relevant paperwork is provided to the Asbestos Team upon completion of any asbestos works.

### 3.8 Commercial Property

- Ensuring that a suitable asbestos management survey is provided to the incoming tenant.
- Ensuring all relevant asbestos paperwork is kept in the commercial property file and provided to the Asbestos Team to update any records/registers.
- Ensuring that before any maintenance, feasibility or project work commences within the landlord managed common parts (such as receptions, plant rooms, washroom etc.,) that the asbestos register is checked by the relevant contractor to obtain any information on the location and condition of any asbestos containing materials within the premises.
- Ensure all works on asbestos are carried out by a competent, correctly trained and insured contractor.
- Ensure that LAMPs are produced and implemented and maintained for landlord managed common parts of premises.
- Ensure that Local Duty Holders are nominated for landlord managed common parts of premises.

### 3.9 Education

- Ensuring that all Head Teachers/Site Responsible Person(s) have developed and are implementing and maintaining an Asbestos Management Plan for that premise.
- Ensuring that all Head Teachers are fully aware that they are the Duty Holder and have full responsibility for the management of ACMs on their premise(s).
- When undertaking and managing their own building/maintenance projects, the Head Teacher/Governors/Diocese are fully responsible for:
  - Ensuring that before any feasibility work or project work is commenced the asbestos register is reviewed and all relevant information provided to the contractor prior to works commencing.
  - If there is no asbestos register for the premises and/or insufficient asbestos information; then the Head Teacher is responsible for organising a suitable asbestos survey as required.
  - Ensuring that where asbestos is identified within a development project, appropriate actions are undertaken to remove all asbestos in accordance with this policy and current regulations.
  - Ensure that all relevant paperwork is provided to the Asbestos Team upon completion of any asbestos works.



### 3.10 Compliance and Surveying

- Ensure that any maintenance or planned refurbishment works are carried out in accordance with the current regulations and this policy.
- Ensure that asbestos registers are checked prior to works commencing and that further surveys are undertaken if there is insufficient information.
- Ensure all works on asbestos are carried out by a competent and correctly trained and insured contractor.
- Ensure Local Asbestos Management Plans and asbestos registers are available for each relevant property and that these plans/registers are implemented, maintained and updated regularly.
- Support the Senior Asbestos Officer in carrying out their duties to ensure compliance within corporate operational properties.
- Ensure that all relevant paperwork is provided to the Asbestos Team upon completion of any asbestos works.

### 3.11 Repairs & Maintenance Commercial

- Ensure that any maintenance or planned refurbishment works are carried out in accordance with the current regulations and this policy.
- Ensure that asbestos registers are checked prior to works commencing and that further surveys are undertaken if there is insufficient information.
- Ensure all works on asbestos are carried out by a competent, correctly trained and insured contractor or CCC maintenance employee.
- Ensure that a full Risk Assessment is conducted prior to any maintenance/repair work on CCC properties prior to works commencing including:
  - Work conducted on Non-Licensed Work (NLW) and/or Notifiable Non-Licensed Work (NNLW) asbestos materials are carried out according to this policy, HSE Guidance and regulations.
  - That an appropriate Plan of Works has been produced prior to works commencing.
  - All R&M employees undertaking works on NLW/NNLW asbestos works are fully competent and trained to undertake such works, and appropriately insured.
  - All appropriate control measures are in place and all requirements as per CAR 2012 have been adhered to.
  - Ensuring all relevant asbestos survey and removal/remedial paperwork is kept in the property file and provided to the Asbestos Team upon completion of works.

### 3.12 Site Responsible Persons

For corporate operational buildings, Site Responsible Persons are generally Building Managers and are the *Local* Duty Holders. Site Responsible Person(s) have responsibilities on site to ensure the Local Asbestos Management Plan is implemented, followed, and maintained.

For educational establishments, Site Responsible Persons are the Head Teachers/Governors and are the *main* Duty Holder for their education premise(s). They are fully responsible to

ensure the LAMP is produced, implemented, maintained and audited on a regular basis along with other responsibilities outlined within this policy and current regulations.

Site Responsible Person(s) are also other CCC employees who have specific duties and responsibilities for the health and safety and maintenance of CCC premises, such as Building Managers for the landlord managed common parts of commercial buildings and House in Multiple Occupancy (HMO) Managers.

Specific responsibilities for Site Responsible Person(s) are described in more detail in the following sections.

### 3.12.1 Corporate Operational Properties – Site Responsible Person(s)

For corporate operational properties each Site Responsible Person(s), who is deemed as the Local Duty Holder, is responsible for:

- Compliance with legislation, best practise and this policy.
- Implement and maintain the Local Asbestos Management Plan for each premise for which they are responsible.
- Ensuring that all their relevant staff are aware of and understand the LAMP and if necessary, the location of any ACMs on the premises.
- Ensuring their staff have suitable and sufficient training and records are kept of this training.
- Ensuring that all contractors/maintenance staff who are working on the fabric of the building have consulted the asbestos register, including the building plan; and sign to state their work will not disturb any known ACMs or areas/items of No Access.
- Ensuring that the emergency procedures in the LAMP are understood by all relevant staff.
- Informing the Asbestos Team of any changes to condition of an ACM, any building changes, and any near miss incidents.
- If procuring building/maintenance works, engage an appropriately trained and licensed (where applicable) contractor; using suitable control measures, to work on ACMs. However, any such works should be procured and managed by the CCC's Compliance and Surveying Team.
- Ensure all relevant asbestos paperwork is filed and also provided to the Asbestos Team upon completion for recording and updating the asbestos register.
- If directing maintenance staff that may disturb the building fabric, conduct the appropriate Risk Assessment prior to such work commencing.
- That all relevant staff with roles and responsibilities under this Policy are aware of their responsibilities and are suitably competent and trained to do so.

### 3.12.2 Educational Properties

For local educational properties each Site Responsible Person(s), who is the Head Teacher and deemed as the Local Duty Holder, is responsible for:

- Compliance with legislation, best practise and this Policy
- Develop, implement, maintain and audit a Local Asbestos Management Plan for that premise
- Ensure they and their relevant staff who also have duties within the LAMP; have suitable and sufficient training and records are kept of this training
- Ensuring they are undertaking, or employing an accredited external contractor, for the regular monitoring of any known or presumed ACM on that premise and ensuring this monitoring is recorded
- Ensuring they engage an appropriately trained and licensed (where applicable) contractor; using suitable control measures, to work on ACMs

- Ensuring they properly vet any contractor employed to ensure they are appropriately trained/licensed and competent to undertake such work and have appropriate insurance in place
- Ensuring they retain and file all relevant asbestos paperwork and provide to the Asbestos Team upon completion
- Ensuring they update the asbestos register, the associated building plan and the AMP following any asbestos remedials or removals
- If directing maintenance staff that may disturb the building fabric, conduct the appropriate Risk Assessment prior to such work commencing.

### 3.12.3 Commercial Properties and Other Relevant Properties

For commercial properties each Site Responsible Person(s), who is deemed as the Local Duty Holder, is responsible for:

- Compliance with legislation, best practise and this Policy
- Develop, implement, maintain and audit a Local Asbestos Management Plan for that premise
- Ensure they and their relevant staff who also have duties within the LAMP; have suitable and sufficient training and records are kept of this training
- Ensuring they are undertaking, or employing an accredited external contractor, for the regular monitoring of any known or presumed ACM on that premise and ensuring this monitoring is recorded
- Ensuring they engage an appropriately trained and licensed (where applicable) contractor; using suitable control measures, to work on ACMs
- Ensuring they properly vet any contractor employed to ensure they are appropriately trained/licensed and competent to undertake such work and have appropriate insurance in place
- Ensuring they retain and file all relevant asbestos paperwork and provide to the Asbestos Team upon completion
- Ensuring they update the asbestos register, the associated building plan and the AMP following any asbestos remedials or removals
- If directing maintenance staff that may disturb the building fabric, conduct the appropriate Risk Assessment prior to such work commencing.

### 3.13 Compliance & Surveying Team Project Managers & Area Surveyors

Area surveyors and compliance engineers manage contractors to carry out repair and refurbishment programmes within CCC properties. As part of these planned works, these Project Managers/Area Surveyors are responsible for:

- Compliance with legislation, best practise, and this Policy.
- Ensuring all relevant asbestos paperwork is kept in the project file and provided to the Asbestos Team to update any records/registers.
- Ensuring that before any maintenance, feasibility or project work commences that the current asbestos register and previous asbestos information is checked, and that all relevant asbestos information is provided to the contractor prior to work commencing.
- Ensure a more intrusive survey is carried out prior to works commencing if there is insufficient information within the current asbestos register. If unsure and seek advice from the Asbestos Management Team.
- Ensuring that any contractor employed to carry out maintenance, feasibility or project work is correctly vetted to ensure they are appropriately trained, insured and competent to undertake all such work.

- Ensuring that any work on ACMs is carried out by an appropriately trained and licensed contractor (where applicable), applying all suitable control measures and work methods and that asbestos waste is disposed correctly.

### 3.14 Senior Asbestos Officer (SAO)

The Senior Asbestos Officer is responsible for ensuring that asbestos registers are produced, provided and maintained for all relevant corporate operational properties. This will include the regular re-inspections of safe and manageable ACMs, ensuring the ongoing upkeep of each asbestos register and that all required remedial works are conducted according to schedule, using competent, suitably trained and insured contractors. The Senior Asbestos Officer will also:

- Ensure corporate operational property management surveys have been undertaken.
- Provide an asbestos advisory role for all other Council properties/departments such as Commercial properties, LEA Schools, Repairs and Maintenance and Project Delivery and procure asbestos surveys where requested.
- Develop and maintain an asbestos register for all corporate operational properties.
- Ensure regular re-inspections are conducted of all known, and presumed, ACMs in all corporate operational properties to ensure the asbestos register is maintained.
- Ensuring the asbestos register is updated whenever asbestos removal or remediation work is carried out as part of the Asbestos Management work programme.
- Maintain the online asbestos management system; ensuring the system is fully capable the ongoing management of asbestos registers whilst remaining fully compliant.
- Upon completion of asbestos remedial works as part of the ongoing asbestos management programme, ensure that all relevant paperwork, such as Certificates of Reoccupation, Air Monitoring, Plan of Works, and Hazardous Waste Consignment Notes are recorded, and the asbestos register updated accordingly.
- Ensure that all works conducted as part of the management programme are compliant with current legislation and requirements:
  - Organise regular audits of the LAMP for all corporate operational properties.
  - Undertake audits for non-corporate Council properties and asbestos as and when required.
  - Assessing, reviewing, and recommending management actions considering re-inspection findings and changes in regulations/legislation and/or current good practise.
  - Managing asbestos surveying/analytical contracts and liaising between the contractors/consultants and CCC employees.
  - Providing specialist advice and guidance on asbestos for all relevant CCC employees, CCC Project Officers (POs) and Project Managers (PMs), regarding the safe management of asbestos and asbestos surveys, analytical works, removal/remedial works and emergency situations.
  - Developing and advising on, asbestos procedures and policy documentation
  - Ensure regular asbestos training is organised for relevant CCC staff and ensure training records are maintained.
  - Attend regular Asbestos Group Meetings.

### 3.15 Technical Asbestos Support

The Technical Asbestos Assistant will assist the SAO as required in the discharge of their responsibilities, including the following:

- Ensure Key Performance Indicators (KPIs) are recorded and monitored to ensure correct monitoring of term contractors.

- Ensuring the online asbestos system is kept up to date, that all survey data is downloaded and associated documentation, such as reports and removal paperwork; and that the contact details for each site is maintained.
- To assist in the development of the asbestos online system along with the SAO and the software contractor.
- To be the main point of contact for all survey requests from CCC employees to the term contractor/consultant.
- Organising regular asbestos training for relevant CCC staff and ensure training records are maintained.
- To attend Asbestos Group Meetings and Contract management meetings.
- To provide some advice and guidance where applicable in the absence of the SAO.

## 4.0 Asbestos Management Surveys

### 4.1 Corporate Operational

Where corporate operational Council premises were built prior to the year 2000, a more recent Asbestos Management Survey has been carried out of each premise which supersedes the older original, Type 2 (management) surveys.

The asbestos team will be responsible for maintaining the registers, organising management surveys and re-inspections and any remedials/removals required regarding the safe management of ACMs in corporate operational properties.

The findings of all surveys undertaken will be used to prepare a register of asbestos containing materials including their location, extent, and condition along with a total risk assessment which details on how best to manage or remediate/remove the material. This register will be reviewed following each re-inspection 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.

### 4.2 Commercial

Asbestos management surveys to Commercial properties will be procured by the SAO using the framework contractors, as and when requested by the Commercial Property Management team.

These survey reports will be provided to the Commercial Property Management team. However, ongoing re-inspections of known and presumed ACMs, and the provision of a re-inspection survey report, will only be carried out by the Asbestos Team when requested.

### 4.3 Education

LEA Schools have all been originally provided with management surveys (Type 2) and are the main Duty Holder of their school premise(s). From this information, the Head Teacher/Site Manager must have compiled the site asbestos register along with the Local Asbestos Management Plan for that premise. This must include the ongoing monitoring of the ACMs within the register and also updating the register when ACMs are removed/remediated or further ACMs found following a more intrusive survey, such as a Refurbishment survey.

All asbestos survey reports must be forwarded to the Asbestos Team for CCC records.

Regular Health and Safety (H&S) audits will be undertaken to ensure ongoing compliance with the AMP.

## 4.4 Repairs & Maintenance

Management surveys requested by Repairs & Maintenance will be procured by the Asbestos Team only as and when requested by R&M. When R&M have obtained their own surveys, these must be forwarded to the SAO for adding to the asbestos management system and/or register if an operational property.

## 4.5 Project Delivery

Management surveys requested by the Project Delivery Team will be procured by the Asbestos Team only as and when requested by the Project Delivery Team. When Project Delivery team have obtained their own surveys, these must be forwarded to the SAO for adding to the asbestos management system and/or register if an operational property.

## 5.0 Asbestos Management Plan

### 5.1 Corporate Operational Properties

Local Asbestos Management Plans (LAMPs) are developed and maintained by the SAO for corporate operational properties, which are then implemented on site by the Site Responsible Person(s)/Local Duty Holders named within the LAMP; ensuring that any potential risk from ACMs is properly managed. This will include procedures for the ongoing monitoring of ACMs, an outline of the responsibility of the Site Responsible Person (Local Duty holder), requirements for carrying out remedial/removal works where necessary, communication of the plan, training requirements and emergency procedures for the discovery, or following, accidental damage.

The emergency procedure within the LAMP is not suitable for individual teams/departments undertaking intrusive building/maintenance works, working on non-licensed ACMs or for collecting fly-tipped asbestos waste. These will be produced by the relevant Deputy Responsible Person.

### 5.2 Local Authority Education Properties

LAMPs are developed, implemented and maintained by the Site Responsible Person(s)/Local Duty Holders for each applicable educational property; ensuring that any potential risk from ACMs is properly managed.

This will include procedures for the ongoing monitoring of ACMs, an outline of the responsibility of the Site Responsible Person (Local Duty holder), requirements for carrying out remedial/removal works where necessary, communication of the plan, training requirements and emergency procedures for the discovery, or following accidental damage.

### 5.3 Commercial Properties

LAMPs are developed, implemented, and maintained by the Site Responsible Person(s)/Local Duty Holders for each applicable commercial property; ensuring that any potential risk from ACMs is properly managed. This will include procedures for the ongoing monitoring of ACMs, an outline of the responsibility of the Site Responsible Person (Local Duty holder), requirements for carrying out remedial/removal works where necessary, communication of the plan, training requirements and emergency procedures for the discovery, or following, accidental damage.



## 5.4 Priorities for Action

The **total** asbestos risk assessment includes a material assessment score provided by the UKAS accredited surveying consultant within their report and a priority assessment score carried out by the Duty Holder/Site Responsible Person, which are assigned using the HSE's algorithms (Appendix 1.0).

The asbestos team is responsible for compiling the priority assessment score for each ACM or No Access area/item for corporate operational properties only.

Commercial, educational operated premises and any other non-corporate property are required to complete their own Priority Assessment Scores to complete the Total Risk Assessment for each ACM.

For management purposes, ACMs are categorised based on the total risk score, with the highest score seen as requiring the most urgent removal/remedial work. The required action is calculated using the Total Risk Score as seen in the Priority Action Table below.

## 5.5 Priority Action Table

**Table 1: Priority Action Table**

Total Risk Assessment Score (MA+PA)	Risk Rating	Action: Access to ACM	Action: Removal/ Encapsulation / Remediation	Re-inspection timeframe
19 to 24	Very High	Restrict access to the area	Remove immediately	n/a
14 to 18	High	Restrict access to the material	Encapsulate / remove/ remediate at the earliest opportunity	Re-inspect every 6 months
10 to 13	Medium	Restrict access to the material if necessary	Ongoing monitoring but schedule for encapsulation / removal / remediation	Re-inspect every 12 months
5 to 9	Low	No immediate action required		Monitor the material and re-inspect every 12-24 months
1 to 4	Very Low	No immediate action required		Monitor the material and re-inspect every 2 months

### Total Risk Score 19 – 24

Materials in this category warrant urgent consideration and all access must be restricted to the item/area until the ACM is removed.

### Total Risk Score 14 – 18

Materials in this category still warrant urgent consideration, as any slight worsening in several contributory factors will result in further deterioration. In these situations, seek a temporary repair or enclosure if immediate removal/remediation cannot be undertaken. Then programme in medium term remediation or removal at the earliest opportunity. If the ACM is left in-situ, then regular monitoring is required.

### Total Risk Score 10 – 13

Materials within this category do not pose an imminent risk and likelihood of fibre release is low under existing conditions. It would be most appropriate to monitor the ACMs on a regular

basis and to undertake remedial or removal works if any deterioration occurs or if the Priority Risk Score increases.

#### **Total Risk Score 5 – 9 & 1-4**

Materials within both these categories are low or very low priority and as no immediate or planned remedial/removal work is required, should be inspected regularly according to their risk. Some of these materials may not be accessible, such as hidden in floor ducts or beneath floor screed; these would not have to be inspected but remain on the asbestos register so as not to be disturbed during refurbishment works.

### **6.0 Corporate Operational Emergency Procedures – Accidentally Damaged or Disturbed**

**These emergency procedures are for accidental damage and disturbance only – and not for reactive or planned works that subsequently disturb potential asbestos materials.**

Emergency procedures required for works on ACMs or maintenance work that will disturb the fabric of the building, will require the employed contractor or specific council service to write specific risk assessments which would include emergency procedures relating to asbestos.

#### **6.1 Unexpected discovery of asbestos or accidentally damaged ACMs**

Any ACM or suspected ACM that is found to be accidentally damaged or unexpectedly discovered must be reported to the Site Responsible Person, or their nominated Deputy; immediately and all access to the area/item restricted whilst further investigations are carried out.

The room must be shut/locked with appropriate signage where possible and the area put out of use.

The asbestos register must be checked by the Site Responsible Person to determine if the material is asbestos. If it is not asbestos, then no further action is required. If it is not known if the material contains asbestos, then the Site Responsible Person will contact the Asbestos Team arrange a suitably qualified and accredited contractor to undertake sampling and analysis. The Site Responsible Person(s) can also contact a suitably qualified and accredited contractor direct to undertake the sampling and analysis.

If the material is asbestos, then the Asbestos Team must be notified, who will arrange for the appropriate remedial works to be carried out and any sampling and analysis to be undertaken by the appropriately trained, licensed and accredited contractor.

#### **6.2 Accidental release of asbestos**

In the event of accidental release of asbestos all 'non-contaminated' persons must be excluded from the area and the Site Responsible Person(s) or manager informed if possible at this stage. It must be determined if the material is asbestos by checking the register. If it is clearly stated that it is not asbestos, then no further action is required.

If there is a *little dust/debris* on clothing then wipe down with damp rags and dispose of these rags as asbestos waste and keep an incident record of the event; which should be reported to the Occupational Health, Safety and Wellbeing Team, who will progress the incident if required and keep personnel records for 40 years.

If there is a lot of dust/debris on clothing, do not leave the area and if possible, put on respiratory protective equipment (RPE). Damp wipe outer clothing and then remove outer clothing prior to moving away from the area. Further damp wipe remaining clothing as necessary with assistance from another person(s) who must be wearing RPE and personal



protective equipment (PPE) prior to aiding. Shower if necessary and ensure all contaminated items are disposed as asbestos waste. Again, the incident must be recorded and report to the Occupational Health, Safety and Wellbeing Team, who will progress the incident if required and keep personnel records for 40 years.

The room/area is to remain locked and the asbestos contamination dealt with by the appropriate contractor.

All relevant paperwork, such as bulk sampling, air monitoring and any remedial/removal work methods will be kept on file and the asbestos register updated where applicable. All relevant paperwork must be sent to the asbestos team.

The HSE's EM1 flow chart outlines the emergency action procedures outlined above and is attached in appendix 2.0 of this document.

## **7.0 Reactive Maintenance Work**

Reactive maintenance work will require the contractor and/or the Deputy Responsible Person to ensure that suitable and sufficient risk assessments are in place prior to such works that will disturb the building fabric of pre 2000 constructed properties.

The Deputy Responsible Person, or their nominated Manager; must ensure that their contractor or CCC maintenance employees have consulted the on-site asbestos register prior to all reactive maintenance works commencing. A record must be kept of this.

If there is the potential for ACMs, or suspected ACMs, to be disturbed or access is required into an area presumed to contain ACMs; then work must cease and not proceed until appropriate inspections are made, such as a Refurbishment survey; prior to works commencing.

If ACMs are then found and are liable to be disturbed during works then the ACMs will be removed by a licensed (where applicable), trained and competent contractor using all correct control measures as outlined by current legislation, guidance notes and approved codes of practise.

Sections 9.0 and 10.0 further outline when to choose a licensed contractor and deciding if work is licensed work (LW) or notifiable non-licensed work (NNLW) or non-licensed work (NLW).

Air monitoring and clearance procedures will be carried out by a UKAS accredited surveying/analytical company where required, during and/or upon completion of asbestos works.

Records of all surveys/analytical works/removal works/waste disposal and discussions with contractors will be retained by the Deputy Responsible Person, or their nominated Manager, to demonstrate that asbestos was properly considered, and appropriate actions taken to prevent disturbance and exposure.

Upon completion of works, all relevant copies of paperwork will be sent to the asbestos team for the ongoing upkeep of the corporate operational building asbestos registers.

All relevant copies of paperwork will be sent to the asbestos team for non-operational properties for filing in the appropriate property folders.

## 8.0 Planned Building/Maintenance Work

Prior to **any** work being carried out on the fabric of (pre-2000) buildings, the person(s) commissioning the works or the Project Officer/Manager will consult the current asbestos register to determine whether asbestos is present, or may be encountered, prior to works commencing.

If there is insufficient information on the register with regards to the level of intrusion into the building fabric, then a Refurbishment or Demolition survey will be commissioned by the Project Officer prior to works commencing to determine the presence of any potential hidden ACMs. This information is provided to the contractor prior to works commencing.

In the event that works disturb any ACMs, suspected ACMs or have the potential to disturb ACM's, then the ACMs will be removed by a licensed (where applicable), trained and competent contractor using all correct control measures as outlined by current legislation, guidance notes and approved codes of practise.

Sections 9.0 and 10.0 further outline when to choose a licensed contractor and deciding if work is licensed work (LW) or notifiable non-licensed work (NNLW) or non-licensed work (NLW).

Air monitoring and clearance procedures will be carried out by a UKAS accredited surveying/analytical company where required, during and/or upon completion of asbestos works.

Records of all surveys/analytical works/removal works/waste disposal and discussions with contractors will be retained by the Project Officer to demonstrate that asbestos was properly considered, and appropriate actions taken to prevent disturbance and exposure.

Upon completion of works, all relevant copies of paperwork will be sent to the asbestos team for the ongoing upkeep of the corporate operational building asbestos registers and for non-operational properties for filing in the appropriate property folders.

## 9.0 Work with Asbestos Materials

Work on higher risk, Licensable ACMs must be carried out by an HSE licensed asbestos removal contractor and notified to the HSE 14 days prior to commencement.

Work on low risk, Non-Licensed ACMs can be carried out by non-licensed personnel and without notification to the HSE; however, these personnel must still be appropriately trained and competent and follow the correct control methods.

Work on low-risk ACMs and some medium risk ACMs, Notifiable Non-Licensed ACMs are to be carried out by non-licensed personnel, but these materials will require notification to the HSE. These personnel must be appropriately trained and competent and follow the correct control measures.

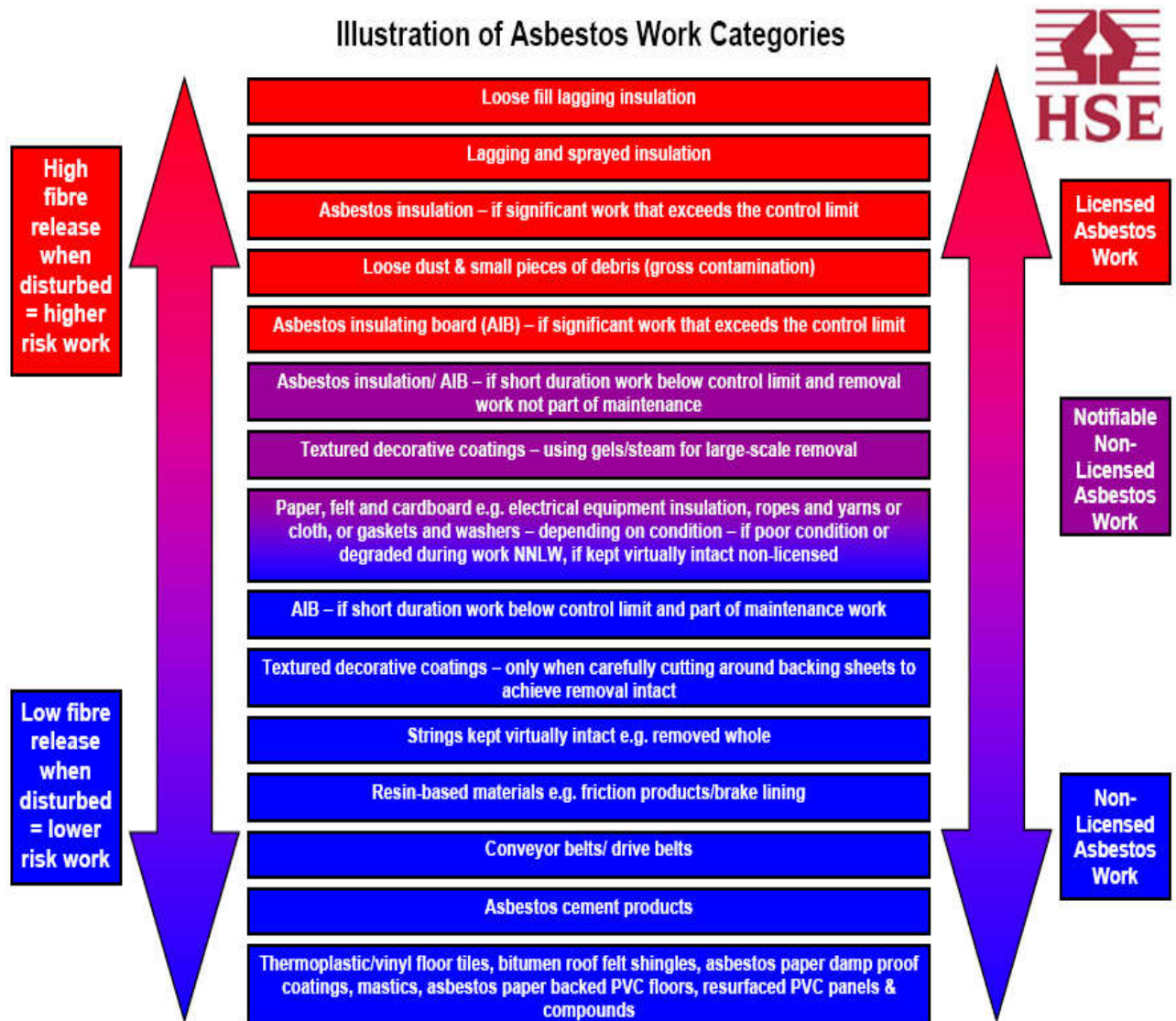
**The three categories of asbestos work are:**

- **Major Works:**
  - Licensed works – 14-day notification and licenced contractor (highest risk work).
- **Minor Works:**
  - Notifiable non-licensed works – notification before works start and competent (non-licensed) contractor.

- **Minor Works:**
  - Non-notifiable non-licensed works – no notification and competent (non-licensed contractor).

## Diagram 2: Illustration of Asbestos Work Categories

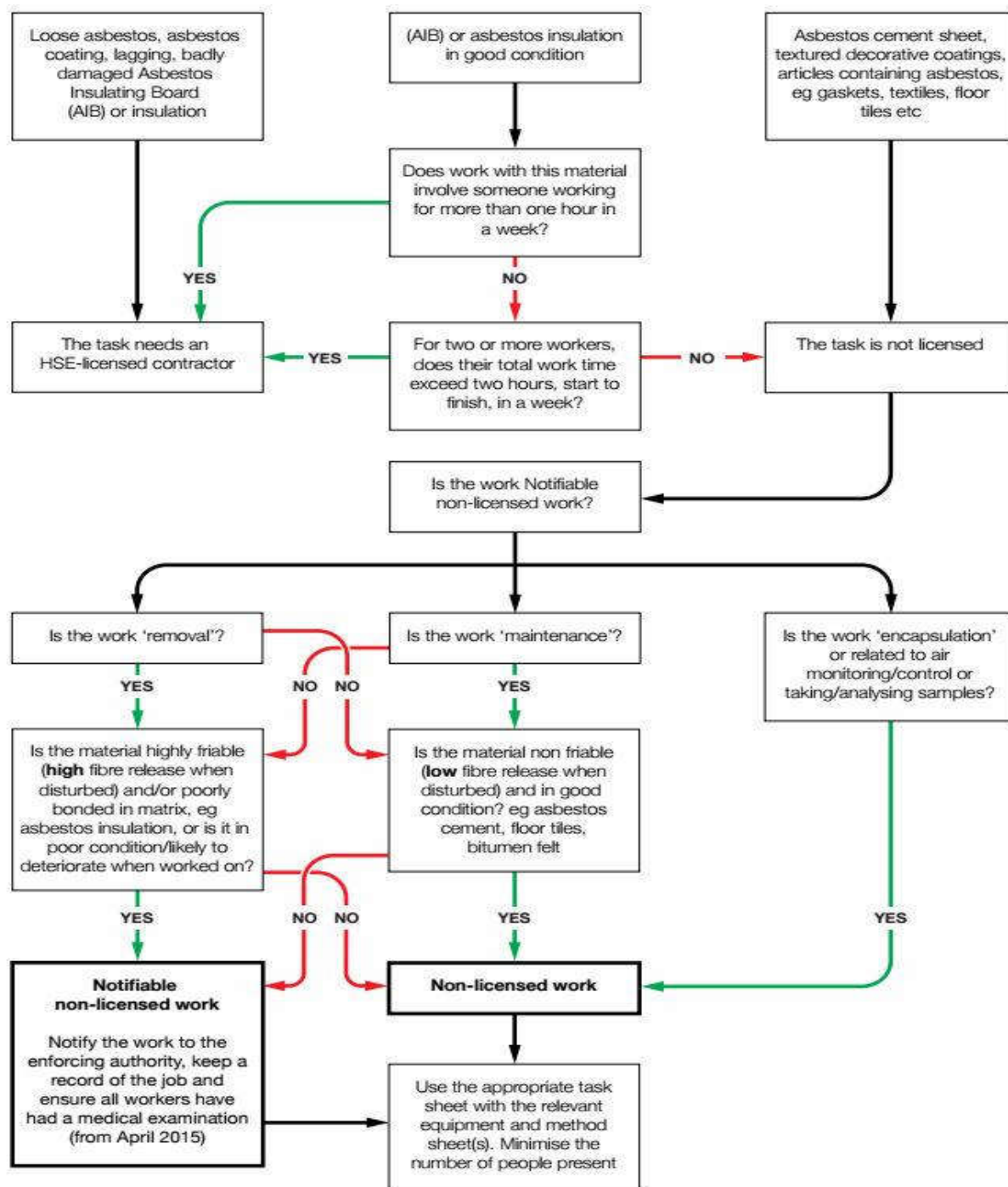
**Note:** This is for illustrative purposes only



## 10.0 HSE Asbestos Work Decision Flowchart

The following flowchart shows the decision-making process on appropriate classification of works which must always be used, prior to any planned works on ACMs:

**Diagram 2: HSE Asbestos Work Decision Flowchart**



Where any doubts exist over the correct classification or scope of asbestos works, advice will be sought from a competent and trained external consultant/contractor or by the Council's asbestos team.

Where works on ACMs does not require to be carried out by licensed contractors (i.e. Minor Works) it will, nevertheless, still be undertaken using all the correct control measures, by appropriately trained personnel and using appropriate risk assessments to ensure the reduction of airborne dusts to as low a level as is reasonably practicable.

All method statements and risk assessments for such work will be screened by a competent and trained person prior to work commencing; such as the person(s) commission the works/Project Manager.

The following documentation will be requested from the asbestos contractor and copies kept in the project file:

- Current asbestos licence check on HSE website.
- Insurance certificate indicating the insured is covered for asbestos work.
- A representative sample of medical examination certificates (conducted by an Employment Medical Advisory Service registered doctor) for personnel who will work on the job.
- A representative sample of training records for all personnel who will work on the job (asbestos management and handling courses), usually provided by a United Kingdom Asbestos Training Association (UKATA) member.
- Where applicable, notification of the job to the HSE 14 days prior to commencement;
- Method statement and risk assessment for the job (Plan of Work).

At the conclusion of all applicable asbestos works, the Council will directly appoint a UKAS accredited Asbestos Analyst to carry out the required level of inspection and test. For licensed works this will include a '4-stage clearance test' and for minor works this will include a visual inspection and reassurance air test where required.

## **11.0 Repairs and Maintenance**

The Repairs and Maintenance team have specifically trained employees that may undertake works on minor/low risk ACMs. The responsibility for compliance with the relevant regulations within CAR 2012 regarding working with ACMs and all other relevant legislation/regulations; will be with the Deputy Responsible Person; namely the Repair and Maintenance Commercial Manager.

These will include, but are not limited to; the following regulations:

- Reg 5: Identification of the presence of asbestos prior to works.
- Reg 6: Assessment of work which exposes employees to asbestos.
- Reg 7: Preparation of a suitable plan of work.
- Reg 9: Notification of work with asbestos (if applicable).
- Reg 11: Prevention or reduction of exposure to asbestos.
- Reg 12: Use of control measures.
- Reg 13: Maintenance of control measures.
- Reg 14: Provision and cleaning of protective clothing.
- Reg 15: Arrangements for dealing with accidents and emergencies.
- Reg 17: Cleanliness of premises and plant.
- Reg 18: Designated areas.
- Reg 19: Air monitoring.
- Reg 22: Health records and surveillance.
- Reg 23: Washing and changing facilities.
- Reg 24: Storage, distribution and labelling of raw asbestos waste.

These regulations must be applied where necessary and all relevant evidence documented and recorded. All removal/remedial paperwork, such as POWs, the notification of work on licensed ACMs (ASB5) and analytical paperwork must also be sent to the asbestos team for updating the asbestos register and recording.



## **12.0 Communication, Information & Training**

The contents of the asbestos management plan and the asbestos register must be communicated to all relevant employees, contractors and other building users where applicable. The communication of the asbestos register, including the locations of ACMs; and the LAMP must be recorded by the Site Responsible Person(s)/local duty holder.

The asbestos management plans and the asbestos registers will be shared with the Emergency Services as required.

Training is provided by the Council to all relevant staff that are deemed as Site Responsible Person/Local Duty Holder and their nominated Deputy and records of training kept and update when required. All Heads of Service are to ensure that relevant staff under their management undertake all relevant and mandatory training.

Asbestos Awareness Training is provided to any employee, or manager of such an employee; that may disturb the fabric of a building as part of their normal work, such as minor, general building maintenance duties. This training is not intended for any work on ACMs, or that which may disturb ACMs. Information, instruction and training for asbestos awareness is intended to give workers and supervisors the information they need to avoid work that may disturb asbestos during any normal work which could disturb the fabric of a building, or other item which might contain asbestos.

Only CCC Repairs and Maintenance employees who plan to carry out work that will disturb low risk asbestos materials and they will be provided with the appropriate level of training, Work on Non Licensable Works on ACMs on a regular basis and training records kept by their management team.

## **13.0 Records**

All persons who commission works which involve asbestos must ensure that all relevant documentation are correctly recorded and filed in the project files, health and safety files and sent to the Asbestos Team to ensure that the asbestos register is kept fully up to date.

Documents include, but are not limited to, the following:

- Analytical paperwork, such as reassurance air monitoring and Certificates of Reoccupation to be kept indefinitely on the Project File and sent to Asbestos Team.
- Hazardous Waste Consignment Notes to be kept in the Project File and sent to asbestos team – Note: it is a legal requirement to keep these for 3 years.
- Contractors Risk Assessments and Plan of Works for asbestos remedial works – kept in Project File and sent to asbestos team.
- ASB5 Notification of work with Asbestos – Project File and sent to Asbestos Team.
- Medical Records to be retained indefinitely by Health and Safety Team.
- Training Records to be retained indefinitely by HR/Responsible Person.
- Incident Records to be retained indefinitely by Health and Safety Team.

## **14.0 Policy Review**

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

The Asbestos Management Procedure document will be reviewed annually.

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

Regular audits will be undertaken on premises where the Statutory Compliance Team 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.

## 15.0 Key Contacts

Name	Title	Email
Daniel Peters	Head of Facilities Management	Daniel.peters@coventry.gov.uk
John Cranston	Compliance & Surveying Manager	John.Cranston@coventry.gov.uk
Rajendra Joshi	Health & Safety Team Leader	Rajendra.Joshi@coventry.gov.uk
Yvette Liening	Senior Asbestos Officer	Yvette.Liening@coventry.gov.uk

## 16.0 Document Control

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

## 1.0 Material and Priority Assessment Score Algorithms

### Material scoring tool

Add the scores for the four sections together to get a total material score.

<i>Sample variable</i>	<i>Examples of scores</i>	<i>Score</i>
<b><i>Product type (or debris from product)</i></b>	Asbestos reinforced composites (plastics, resins, mastics, roofing felts, vinyl floor tiles, semi-rigid paints or decorative finishes, asbestos cement etc.)	1
	Asbestos insulating board, mill boards, other low density insulation boards, asbestos textiles, gaskets, ropes and woven textiles, asbestos paper and felt.	2
	Thermal insulation (E.g., pipe and boiler lagging), sprayed asbestos, loose asbestos, asbestos mattresses, and packing.	3
<b><i>Extent of damage/deterioration</i></b>	Good condition: no visible damage.	0
	Low damage: a few scratches or surface marks; broken edges on boards, tiles etc.	1
	Medium damage: significant breakage of materials or several small areas where material has been damaged revealing loose asbestos fibers.	2
	High damage or delamination of materials, sprays, and thermal insulation. Visible asbestos debris.	3
<b><i>Surface type/treatment</i></b>	Composite materials containing asbestos: reinforced plastics, resins, vinyl tiles	0
	Enclosed sprays and lagging, asbestos insulating board (with exposed face painted or encapsulated), asbestos cement sheets etc.	1
	Unsealed asbestos insulating board, or encapsulated lagging and sprays	2
	Unsealed laggings and sprayed asbestos	3
<b><i>Asbestos type</i></b>	White (Chrysotile) only	1
	Brown (Amphibole asbestos excluding crocidolite) and mixtures (not blue)	2
	Blue (Crocidolite) and mixtures or type unknown	3
<b>TOTAL MATERIAL ASSESSMENT SCORE</b> (maximum score of 12)		



## Priority Scoring Tool

### Important Note:

Add the normal occupant activity score to the three average scores from the likelihood of disturbance, human exposure potential and maintenance activity sections to get a total priority score. This is then added to the material score to give the total overall score.

Normal Occupant Activity			
Sample variable	Examples of scores	Score	
Main type of activity in area	Rare disturbance activity (E.g., little used storeroom)	0	
	Low disturbance activities (E.g., office type activity)	1	
	Periodic disturbance (E.g., Industrial, or vehicular activity which may cause contact with ACMs)	2	
	High levels of disturbance, (E.g., fire door with asbestosinsulating board sheet in constant use)	3	
Total			
Likelihood of disturbance			
Location	Outdoors	0	
	Large rooms, warehouse, or well-ventilated areas	1	
	Rooms up to 100 sq meters in area	2	
	Restricted or confined areas	3	
Accessibility	Usually inaccessible or unlikely to be disturbed	0	
	Occasionally likely to be disturbed	1	
	Easily disturbed	2	
	Routinely disturbed	3	
Extent/amount	Small amounts or single items (e.g., strings, gaskets)	0	
	Less than 10 sq meters area, or 10-meter pipe run.	1	
	10 to 50 sq meters area or 10 to 50 meters pipe run	2	
	More than 50 sq meters, or 50 meters pipe run.	3	
Average of scores for location, accessibility, and extent/amount. (maximum score of 3)			
Human exposure potential			
Number of occupants	None	0	
	1 to 3	1	
	4 to 10	2	
	More than 10	3	
Frequency of use of area	Infrequent	0	
	Monthly	1	
	Weekly	2	
	Daily	3	
Average time area is in use	Less than 1 hour	0	
	1 to less than 3 hours	1	
	3 to less than 6 hours	2	
	More than 6 hours	3	
Average of scores for number of occupants, frequency of use, and average time area is in use. (maximum score of 3)			
Maintenance activity			
Type of maintenance activity	Minor disturbance (E.g., possibility of contact when gaining access)	0	
	Low disturbance (E.g., changing light bulbs in asbestosinsulating board ceiling tiles)	1	

	Medium disturbance (E.g., lifting one or two asbestosinsulating board ceiling tiles to access a valve)	2	
	High levels of disturbance (E.g., removing several asbestos insulating board ceiling tiles to replace a valveor for re-cabling, or leak repair)	3	
<b>Frequency of maintenance activity</b>	Unlikely – almost never	0	
	Less than once a year	1	
	Less than once a month	2	
	More often than once a month	3	
<b>Average of scores for type of maintenance activity and frequency of maintenance activity (maximum score of 3)</b>			

**TOTAL PRIORITY ASSESSMENT SCORE**

*(This is the occupant activity score added together with the three average scores)  
(maximum score of 12)*

**Material assessment score**

**Priority assessment score**

**Total overall score**

**(maximum overall score of 24)**

## 2.0 HSE EM1 Flowchart – Discovery or Accidental Disturbance of ACMs

