



# Asbestos Management Plan – 2024/25

Version	Date	Name	Description
V2.2	27.06.23	G Ilett	<p>The HPS's technical procedures and guidance are separate documents (in service operational documents) Keystone references removed *unsupported system. Roles and responsibilities - simplified. RIA roles removed in light of keystone system become a redundant system.</p> <p>5.8.1 – fundamental re-write in light if keystone being unsupported and reverting to hard copy asbestos register system.</p> <p>5.14 Control of contractors – now signposts where further advice and support can be obtained.</p> <p>Previous section 5.16 deleted (construction design management) and has been amalgamated into section 5.14 (they are the same subject)</p> <p>5.18 rationalised (duplications covered in Appendix 7 removed)</p> <p>Removed appendices that duplicate content.</p> <p>5.20 legal references removed – duplication of policy document.</p>
V2.3	09.08.23	P Cottam	<ul style="list-style-type: none"> <li>• Removal of AMP duplication</li> <li>• Removal of appendices with references to legislation, ACoPs and guidance documents (these are within the AMP).</li> <li>• Review cycle removed (these are within the policy_.</li> <li>• Section added in relation to Process Flow diagrams.</li> <li>• Procedures updated to reflect the Process Flow diagrams.</li> <li>• Background and purpose sections removed.</li> <li>• References to Armstrong York and Environmental Essentials removed.</li> <li>• Glossary of terms removed (these are within the AMP).</li> <li>• Council Risk Management Group (CRMG) and Health and Safety Forum Group (H&amp;SFG) references removed.</li> <li>• References to Keystone removed.</li> <li>• References to electronic registers removed. Replaced with premises register, where appropriate.</li> <li>• Research &amp; Information Assistant (R&amp;IA) role replaced with Responsible Persons.</li> </ul> <p>Housing Property Operations (HPO) changed to Housing Property Services (HPS).</p>

V2.4	2.10.23	TU safety rep feedback	<ul style="list-style-type: none"> <li>H&amp;S policy process meeting 2.1.23 TU safety representative feedback.</li> <li>Further help and support reference added.</li> <li>Revise Glossary of terms (moved to start of document).</li> </ul>
V2.4	17.11.23	GI	<ul style="list-style-type: none"> <li>GI responses and further drafting work. Incorporating TU Safety Rep feedback and suggestions. Re-formatting.</li> <li>CDM section revised.</li> <li>New revised version issued to TU safety representatives + a clean version.</li> </ul>
V2.5	21.11.23	GI/Peter Cottam	<ul style="list-style-type: none"> <li>Training matrix revised (post TU feedback)</li> <li>Added IATP to external training suppliers in addition to UKATA (HSE industry recognised training providers). PC -recommended widening the scope of training providers opens a wider pool of competent training providers</li> </ul>
V2.6	05.12.23	GI	<ul style="list-style-type: none"> <li>Formatting and removing minor inaccuracies</li> </ul>
V2.7	31.01.24	GI	<ul style="list-style-type: none"> <li>Title of document – financial year attached.</li> <li>Statement of intent – amended to read easier for the reader (post feedback).</li> <li>Further help and support paragraph amended.</li> <li>Management meeting (Matt Sorby 11.1.24) requesting RIA continue to support asbestos register updating until P&amp;TS reshape is complete. Agreed with HPS management (Vanessa Watson, Cathy Jones and Nicola Fletcher 30.1.24) RIA supporting RP added back into roles and responsibilities section.</li> <li>30.1.24 Agreed at H&amp;S chairs meeting to progress with formal policy, AMP and procedure approval processes.</li> <li>Responsible person duties revised to reflect the RIA supporting role and RIA duties re-added to section 5.1.</li> </ul>

## Further help and support.

If you are in any doubt or require further assistance understanding this policy, AMP or associated technical procedures. Please contact your H&S adviser. In certain circumstances this help may require external specialist subject matter expert consultant advice.

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## GLOSSARY (OF TERMS / ABBREVIATIONS)

ACM	Asbestos Containing Material
ACOP	Approved Code of Practice
ACS	Asbestos Compliance Specialist
AIB	Asbestos Insulation Board
AMP	Asbestos Management Plan
ARC	Appointed Asbestos Removal Company
ARCA	Asbestos Removal Contractors Association
ASC	Appointed Asbestos Survey Company
Aspire	Council internal intranet
CAR	Control of Asbestos Regulations (2012)
CDM	Construction Design Management Regulations 2015
CLT	Corporate Leadership Team
Customer -	Meaning tenant (including domestic and business/ commercial/ corporate tenants), service user, resident, occupant, shared owner, leaseholder
DFG -	Disabled Facilities Grant
Friable	A material easily damaged and likely to release fibres
HPS	Housing Property Services
H&SC	Health & Safety Committee
LW	Licensed Work (fully controlled conditions)
MBO	Managed by Others (Council owned property)
MRA	Material Risk Assessment (as defined within HSG264)
NLW	Non-Licensed Work (lower risk HSE defined work category)
NNLW	Notifiable Non-Licensed Work (HSE defined work category)
Northgate	Housing Management Information System (incl. repairs ordering)
PPE	Personal Protective Equipment

PRA	Priority Risk Assessment (as defined within HSG227)
RA	Risk Assessment (relative risk including task/ material/ frequency)
RAMS	Risk Assessment and Method Statement
Responsible Person (RP)	CBC role which applies to: Asset Management Coordinator, Housing and Private Sector Housing Managers, Commercial Services (HPO) Managers, Operational/ Premise Managers, Technical Officers, and Service Delivery Staff. Housing Managers.
RIDDOR	Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013
RPE	Respiratory Protective Equipment
SLT	Senior Leadership Team
TNA	Training Needs Assessment
UKAS	United Kingdom Accreditation Service
UKATA	United Kingdom Asbestos Training Association
Asbestos register	This can refer to software used by services or hard copies of survey reports.

## 1. DOCUMENT MANAGEMENT INFORMATION

<b>Risk Assessment</b>	To define the management of risks from Asbestos Containing Materials.
<b>Associated CBC Policies &amp; Procedures relevant to this AMP</b>	<ol style="list-style-type: none"> <li>1) Asbestos Policy.</li> <li>2) Asbestos Survey Procedure</li> <li>3) Asbestos Removal Procedure</li> <li>4) Asbestos Compliance + Quality Audit Procedure</li> <li>5) Asbestos Emergency Works Procedure</li> <li>6) Communications protocol: Informing Residents/ Customers about Asbestos</li> <li>7) Asbestos 'No' or Refused Access Procedure</li> <li>8) Health &amp; Safety Policy</li> <li>9) Contractor/ CDM Policy; and</li> <li>10) Managing Contractors (working for and on behalf of the Council) Policy.</li> <li>11) Respiratory Protective Equipment Policy</li> </ol> <p>Operational asbestos specific instructions.</p> <ol style="list-style-type: none"> <li>12) HPS – non licensed asbestos operational guidance (contact HPS) / asbestos essentials</li> </ol>
<b>Director / AMP sponsors</b>	<p>Service Director - Corporate.                  Service Director for Economic Growth.                  Service Director - Housing.                  Service Director - Leisure, Culture and Community Wellbeing</p>
<b>Relevant AMP / Policy Specialist</b>	<p>Strategic Health Safety and Risk Manager                  Health &amp; Safety Advisers                  Asbestos Surveyor (Vacant)                  External asbestos consultants (as applicable)</p>
<b>Applicable to</b>	Council, Consultants and Contractors incl. Housing Property Services (HPS).
<b>Responsibility for Implementation</b>	Chief Executive Officer
<b>AMP 'Owner'</b>	Health, Safety & Risk service
<b>Date of this Review</b>	31 January 2024 - v2.7
<b>Date of consultation with Health &amp; Safety Committee (H&amp;SC) endorsement</b>	14 February 2024 - endorsed
<b>Date Approved by Employment and General Committee</b>	<b>25 March 2024</b>

<b>Date of Next Review (Annual Cycle)</b>	Financial year: 2025/26
<b>Circulation list</b>	Available to all Council officers electronically on 'Aspire', the Council intranet

## 2. STATEMENT OF PURPOSE

This asbestos management plan (AMP) is to be read in conjunction with the Council's asbestos policy. The AMP provides a practical interpretation as to how we will undertake the management of asbestos within the properties for which we have a relevant management responsibility, including our responsibilities to customers (particularly those occupying/ visiting our buildings), staff and other stakeholders. In many cases, this AMP will be read in conjunction with the corresponding supplementary technical corporate procedures.

The AMP applies to all Council properties, unless the asbestos management responsibilities have been transferred by the Council to a third party. For example, by a contract to a freeholder, business tenant, lessee or other occupier. The AMP covers domestic rented properties, communal areas (including those to leasehold property) and non-domestic (corporate and commercial) properties including offices, civic buildings or leisure facilities, industrial units and shops.



## 3. PURPOSE OF THE PLAN (THE AMP)

This AMP details responsibilities required by the Council's Chief Executive, the policy owner, the nominated dutyholders, and the appointed responsible persons for the Council, or persons working for the dutyholder, in order to maintain compliance with the Control of Asbestos Regulations (CAR) 2012 in the management of asbestos-containing materials within the properties and regarding the activity (management or practical work) for which the Council have responsibility.

In effectively managing identified, or presumed, ACMs to all properties then the Council will not only be complying with current legislation, but also will be preventing the exposure to asbestos fibres of any staff, maintenance staff, contractors including the Council's Housing Property Services [HPS], occupants and visitors to their properties.

The asbestos survey data regarding ACMs identified, or presumed to be present to each property, should be consulted by all staff (maintenance or otherwise) who may in the course of their normal duty disturb the identified materials. In addition, all external contractors, HPS, or property staff visiting the properties to conduct/ specify works which may disturb or mean they may come into contact with ACMs whilst on the site are also required to access and consult this information. This may also include arrangements for properties owned by the Council, where they area agency managed, corporate/ commercial property sub-let and managed on behalf of the Council, or subject to business tenancies where the Council may still undertake, specify or manage work.

It should be noted that this document is specifically written in relation to the council's duty to manage asbestos, as described within CAR 2012. Therefore, it **does not** attempt to also comprehensively describe or dictate what the policy or practical interpretation (procedures) should be for HPS. The HPS's technical procedures and guidance.

### 3.1 Reviewing the Management Plan

The AMP will continue to be reviewed on an annual basis to ensure that it is achieving its objectives. If a change in circumstances occurs which indicates that the AMP is not achieving its objectives, i.e. appropriately managing risk associated with asbestos containing material (ACM), then it is to be reviewed at an appropriate frequency until an effective Asbestos Plan is re-established. The AMP is policy guidance not a policy document for the purposes of corporate H&S review purposes.

The Asbestos Policy will follow Council policy approval processes after each review cycle.

## 4. INTRODUCTION

This Asbestos Management Plan (AMP) applies two primary asbestos survey strategies as set out within

### Appendix 2:

#### **Strategy 1: Surveyed Properties.**

For premises that have had a complete/comprehensive 'Management Survey' – 'Standard Sampling and Assessment Survey' (formally 'type 2') conducted in accordance with HSG264 'Asbestos: the survey guide'. These surveys provide the most up to date information for the presence of ACMs identified within the council's property portfolio.

#### **Strategy 2: Non-Surveyed Properties.**

Applies to premises yet to be surveyed (or surveyed comprehensively). The council will employ a 'presumption' of the presence of ACMs to these premises based upon their age, and results of surveys to similar age/ construction properties. **Appendix 3** summarises ACMs that can be presumed to be present.

Asbestos information is accessible from each premises manager (responsible person) via management survey and other ACM surveys.

## 5 Context

ACM pose a potential risk to health if persons are exposed to airborne fibres. **Appendix 9** provides more background as to the health hazards and occupational groups most at risk.

It is not a requirement of asbestos regulations for employers or persons responsible for health and welfare (of workers, employees, contractors, visitors, third parties likely to become affected by his undertakings), to remove all asbestos when identified. However, by the use of risk management they must manage ACMs via reasonably practicable means to prevent exposure to asbestos fibres and thus comply with the regulations.

**It is therefore NOT always essential to remove all asbestos-containing materials but to manage them safely, unless it becomes a risk (to occupants/ staff/ those visiting or working within the building).**

## 5.1 Hierarchy of Control/ Roles and Responsibilities

**Appendix 1** sets out the headline ‘Responsibility Structure’ adopted by the Council for the management of ACM.

The following table summarises the responsibilities at the council. Further specific responsibilities are set out within the individual Procedures (listed at section 6).

Role	Responsibility
<p><b>Corporate Responsibility:</b></p> <p>Chief Executive.</p>	<p>The council’s Dutyholder responsible to ensure the council’s compliance with Health and Safety legislation, CAR 2012, and the safe management and prevention of risk is achieved overall.</p> <p>At reasonable intervals seek demonstrable assurance from the individual Dutyholders and the appointed Responsible Persons, so as to substantiate the implementation, observance, performance and adequacy of this AMP.</p> <p>Oversight and review to ensure compliance objectives are met (via the AMP) will be practically delegated to the Service Director – Corporate and the Strategic Health, Safety and Risk Manager.</p>
<p><b>Strategic:</b></p> <p>Service Director for Economic Growth.</p> <p>Service Director - Housing.</p> <p>Service Director - Leisure, Culture and Community Wellbeing</p> <p>Service Director – Digital HR and Customer Services</p>	<p>Responsibility for ensuring that the Asbestos Policy, Asbestos Management Plan and associated procedures are implemented within their service directorates.</p> <p>Coordinates asbestos compliance activity strategically on behalf of the council working with all directorates.</p> <p>Ensure that adequate resources are available to meet the requirements of the Asbestos Policy, Asbestos Management Plan and associated procedures.</p> <p>Oversight to ensure Strategic compliance objectives are met.</p> <p>Ensure the appointment of asbestos Surveying (ASC), and Asbestos Removal (ARC) companies and Asbestos Compliance specialist (ACS).</p>

	<p>Ensure all properties within each service directors' remit has an accurate Asbestos Register.</p> <p>The Service Director – Housing, is also responsible for ensuring the specific Housing asbestos policy and HPS asbestos guidance and technical procedures are fully applied for domestic stock.</p>
<b>Role</b>	<b>Responsibility</b>
<p><b>'Policy/ AMP Owner' Health and Safety</b></p> <p>Health, Safety &amp; Risk team (Lead professional)</p>	<p>Provide a clear policy and AMP documentation for council officers.</p> <p>Provide a standardise framework for services to follow to assist them in complying with corporate policy and the AMP.</p> <p>Support the procurement and engagement of Policy Specialists and competent contractors.</p> <p>Liaise with internal and external audit functions (and coordinate where appropriate).</p> <p>Complete periodic updates.</p>
<p><b>Relevant AMP/ Policy Specialist: (implementation and co-ordination)</b></p> <p>Asbestos Surveyor (in absence of Asbestos Surveyor, this reverts to a H&amp;S adviser). External specialists support as needed.</p>	<p>To provide a lead administrative role for the Council's asbestos arrangements in accordance with the Council's Asbestos Policy, Asbestos Management Plan and procedures to ensure compliance with the Control of Asbestos Regulations (CAR) 2012, and any updates to CAR. To enable and assist in maintaining an accurate asbestos register. To act as a specialist adviser and a single point of contact for all dutyholders and responsible persons in their asbestos responsibilities.</p> <p>Support service directors in the implementation and coordination of the Asbestos Policy, AMP and associated procedures.</p> <p>Complete periodic compliance reviews</p>

	<p>Liaise with internal and external audit functions (and coordinate where appropriate).</p>
<p><b>Other Relevant AMP/ Policy Specialist: (implementation and co-ordination)</b></p> <p>Corporate Health &amp; Safety Advisor. Asset Management Coordinator (for Housing). Facilities Maintenance Team Leader. Project safety (Capital Project Manager (H&amp;S) posts).</p>	<p>Support requirements to ensure the Asbestos Register, the retained data, and access to the data (by all those that need to use it) is compliant.</p>
<p><b>DutyHolder:</b></p> <p>Service Director for Economic Growth.</p> <p>Service Director - Housing.</p> <p>Service Director - Leisure, Culture and Community Wellbeing</p> <p>Service Director – Corporate</p> <p><b>Deputy DutyHolders:</b></p> <p>Officers identified by the service director to manage the Asbestos responsibilities within their directorates.</p> <p>Including (subject to change) Head of Corporate Property and Technical Services Asset Management and Programme Works manager Capital Work Manager Responsive repairs Manager Asset Management Coordinator (for Housing). Cultural services manager</p>	<p>Ensure compliance with the Council’s Asbestos Policy and AMP at all times (within their areas of responsibility)</p> <p>Ensuring standardisation of compliance approach and associated data availability to key staff with asbestos responsibility.</p> <p>Ensure that only competent asbestos Surveying (ASC), and Asbestos Removal (ARC) companies and Asbestos Compliance specialist (ACS) are engaged for any works with ACM within their premise portfolio.</p> <p>Effectively manage identified and presumed ACMs to prevent exposure to asbestos to any party whilst on site.</p> <p>To ensure that monitoring re-inspections of identified ACMs are conducted on a routine risk assessed basis. This may include a proportion of re-inspection surveys conducted by ‘in-house’ survey staff when ‘competent’ to do so.</p> <p>To communicate the presence of identified or presumed ACMs, and associated risks, to the occupants of those properties for which they are responsible.</p> <p>To ensure the implementation of this Management Plan and associated procedures.</p>

<p><b>Responsible Persons (RPs) – this role can also be referred to as ‘premise managers’ and ‘Client officers’ in relation to Construction Design Management regulations.</b></p> <p>HPS Managers and team leaders (including Technical / Specialist leads)</p> <p>Premise Managers*.</p> <p>Private Sector Housing Manager.</p> <p>Service Delivery Staff*.</p> <p><i>*To reflect the differing service delivery teams as directed in each Service Area by the Service Directors and Senior Leadership Team. This includes the HPS, and work undertaken by them.</i></p>	<p>They must ensure the Asbestos policy and AMP and associated technical (operational) procedures are complied with and followed at all times (as applicable). This is in relation to properties for which they are responsible. This may in some circumstances apply to property not owned by CBC (Private Sector Housing adaptations for example).</p> <p>Ensure that surveys to the premises/works for which they are responsible are carried out in accordance with current guidance and, are programmed to ensure that those properties for planned (or intrusive) maintenance works are given appropriate priority. Also ensure surveys are appropriate/ satisfactory for the work to follow.</p> <p>To ensure that all relevant parties are informed as to the presence of any identified or presumed ACMs within the property for which they are responsible so that they may act accordingly.</p> <p>To act as the contact in the case of any emergency in relation to asbestos for the properties for which they are responsible.</p> <p>To assist Dutyholders in the communication of the presence of identified or presumed ACMs, and associated risks, to the occupants of those properties for which they are responsible. Consider at the initial outset of any project / repair, the possibility of disturbing ACMs and then act accordingly to mitigate risk including RAMS assessments/ evaluation where appropriate.</p> <p>Coordinate and act upon ongoing re-inspection programmes and interpretation/ implementation of survey recommendations arising.</p> <p>Ensure appropriate/ sufficient surveys commissioned, recommendations interpreted, and orders issued for asbestos removal/remediation work arising in respect to all work streams.</p>
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	<p>Responsible Persons will have responsibility for ensuring accurate Asbestos Register information. All ACM removal is accurately reflected in the premises' asbestos register.</p> <p>Client officer- A Council employee supervising the contract, acting as the point of contact for a contractor, the person who commissions the asbestos work anyone for whom a construction project is carried out.</p> <p>The client has responsibility to make suitable arrangements for managing a project.</p> <p>This includes making sure that: A principal designer and principal contractor is appointed by the client to plan, manage, monitor and co-ordinate health and safety during the construction phase of a project when there's more than one contractor involved. Other dutyholders are appointed, sufficient time and resources are allocated.</p> <p>That relevant information is prepared and provided to other dutyholders. The principal designer and principal contractor carry out their duties. That welfare facilities are provided.</p> <p>Liaise with and proactively check that Research Information Assistants (RIA) have updated the asbestos register on behalf of the RP. The RP must ensure that the asbestos register accurately reflects any updates and changes in status for any ACM they are responsible for (e.g. checking for any possible input mistakes or other omissions).</p>
<p><b>Research Information Assistants (RIA)</b> Support the Responsible Persons for both domestic and non-domestic stock in regards updating the Asbestos Register</p>	<p>RIA will receive, validate and import survey update information on behalf of the Responsible Person (RP). This might be reinspection results, updates and results from ACM removal and abatement data (and supporting documentation). Helping ensure Asbestos Register is accurately updated.</p>

	<p>Provide Asbestos Register system reporting outputs and trend analysis data for inclusion in management and performance reporting as requested.</p> <p>Communicate to the RP once an input has been completed so that RP can review check their asbestos register is accurate. This will also ensure there is familiarity with any updates completed.</p>
<p><b>All Staff / Contractors:</b></p> <p>All staff, employees, HPO internal works operatives, and external contractors (including sub-contractors).</p>	<p>Observe and implement the requirements of this Management Plan, and to assist in its implementation and maintenance.</p> <p>Report any known or suspicious damage to the responsible person (log damage on SHE (Evotix) reporting system)</p> <p>Take reasonable care for their own Health &amp; Safety and that of persons who may be affected by their acts, or omissions, including members of the public, visitors, tenants, and contractors.</p> <p>Co-operate with the Duty Holders and Responsible Persons in fulfilling their duties to manage asbestos.</p> <p>Attend training as requested by their employer.</p> <p>Escalate issues to the appropriate person (will potentially contribute to 'lessons learned' [see 'Appendix 6']).</p> <p>Visiting contractors, sub-contractors, or internal works operatives (HPS) to fully observe their own obligations under current legislation and prevailing guidance. This to include suitable training, reference to asbestos information, incorporation of appropriate measures (as part of job specific risk assessments) and resultant safe working practice.</p>
<p><b>Audit / Quality Control:</b></p> <p>Health, safety and risk team / Asbestos surveyor/ external specialist (if commissioned)</p>	<p>Carry out periodic audit of compliance regime and monitor its implementation. This should include reporting on any compliance issues.</p> <p>Provide statistical reports and trend analysis reports.</p>



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## 5.2 Management Procedures

The duty holder will follow the measures set out in the AMP and Procedures in order to ensure compliance with the CAR 2012.

In the event of issues or instances falling outside of these operational protocols, the Health, Safety and Risk team, the Asbestos Surveyor post will provide clarification and where appropriate, will refer, liaise and take advice from the (external) Asbestos Compliance Specialist (ACS).

### 5.2.1 Measures for Managing the Risk

Effective management of ACMs is based upon the results of surveys carried out to properties. The above are standard recommendations and as such an individual dutyholder may observe (follow) or amend the recommendations, as deemed appropriate. Any amendments to recommendations will be based upon the dutyholder's and their responsible persons will likely have to build over time intimate knowledge of such criteria as: the remaining operational lifetime of the building, predicted future occupation levels for the building, future refurbishment projects etc. These will be assessed by the council and then employed to identify the most appropriate and applicable management strategy for each of the ACMs on site. The Dutyholder's and Responsible Persons should challenge reports which they know to reflect inaccuracies. They should engage the advice of the HSR team if they require any technical assistance.

## 5.3 Asbestos Surveys and Information

To manage the risk from ACMs in a given building it is necessary first of all to identify where they are present. All pre 2000 properties within the council's portfolio are to be surveyed in accordance with the Health and Safety Guidance document *HSG 264 'Asbestos: The survey guide'* and the '*Control of Asbestos Regulations 2012, Regulation 4 - Duty to manage asbestos in non-domestic premises*.

This will include, at a minimum:

- **Housing Non-Domestic Areas:** 100% management survey to the non-domestic (communal) properties or areas associated with our rented or leased housing, including communal garage blocks externally.
- **Housing Domestic Property:** A pro-active prioritised survey programme of all our domestic properties (typically rented flats and houses) based upon higher risk asbestos identified in our existing data, or other relevant criteria (age, construction type, etc). This protocol will be subject to annual review to monitor progress and ensure this remains fit for purpose.

- **Corporate (Non-Domestic) Property:** 100% management survey to all non-domestic corporate property and areas that the Council owns and retain management responsibility for.
- **Corporate (Non-Domestic) Sub Let Property:** Initial 100% management survey to the non-domestic corporate property and areas that the Council owns and sub-let and intentionally devolve the on-going management responsibility to the lessee/ business tenant for. These surveys to then be passed onto the responsible lessee/ business tenant with which to undertake their own statutory obligations thereafter. This may include corporate/ commercial property sub-let and managed on behalf of the Council; and
- **Pre-Intrusive Work Surveys:** Carry out pro-active surveys where required prior to any work intrusive to the fabric of a building, including planned maintenance, void works and day to day repairs.
- **Other:** 100% management survey to any other properties for which the Council is responsible which meet the criteria given in the CAR Regulation 4 and ACoP L143.

### 5.3.1 Asbestos surveys will fall into one of two categories:

- Programmed (pro-active); and
- Re-Active.

Programmed surveys will be prioritised based on the perceived risk determined by the age/ type and previous knowledge of the premises, or the impending date of major refurbishment/ intrusive work likely to damage the fabric of the building.

Re-active surveys are to be undertaken where maintenance or other specific works are planned/ required prior to a programmed survey's commencement. Re-active surveys will also be carried out in unplanned/ emergency situations (where a suspect ACM may potentially have been disturbed), or in relation to new acquisitions and disposals where a current survey does not exist/ is considered inadequate.

Surveys will be undertaken in accordance with the methodology set out within *HSG 264 Asbestos: The survey guide* and generally consist of **Management Survey** with a **Refurbishment and Demolition** (intrusive) **Survey** typically in specific areas (or in the whole building before demolition), once project particulars have been agreed. Survey data (and corresponding survey report where appropriate) will be imported into the Council's Premise Asbestos Register. Thereafter **Re-Inspection Surveys** maybe required on a periodic basis.

### 5.3.2 Types of Survey

In accordance with *HSG 264 Asbestos: The survey guide*.

#### ***Management Survey.***

Comprehensive property survey with all areas accessed that can be, internal and external, without causing damage. All suspect materials sampled for laboratory analysis or otherwise presumed. For all ACMs the asbestos type is determined by laboratory analysis and a 'Material risk assessment' calculated. 'Priority risk assessment' is also undertaken, typically based on default criteria agreed to apply for Council property and occupancy types (see **Appendix 5**).

### ***Refurbishment and Demolition Survey.***

Similar to Management Surveys (above), but fully intrusive to 'open up' concealed areas (e.g. boxing around services, or constructional cavities) before work.

Refurbishment survey is required prior to any intrusive work (or demolition) likely to disturb the fabric of the building and not simply a representative sample. Where intrusive work will be confined to specific areas of a property (e.g. the kitchen or bathroom), then the refurbishment survey elements can reflect this. To be appropriate therefore, the full extent of work anticipated needs to be carefully discussed with the Asbestos Survey Company (ASC) before inspection. Any suspect material uncovered will be sampled for analysis.

Being a '*fully intrusive*' survey, all relevant areas must be accessed/ sampled, i.e. no 'No Access' areas remaining within areas relevant to the works proposed. Disturbance to decorative finishes/ tiling which require repair must be anticipated.

If a property requiring refurbishment survey has not received any previous survey reports, then all other areas not previously surveyed (not requiring 'refurbishment survey') should simultaneously receive a 'management survey' to ensure the whole property has been suitably and sufficiently assessed for asbestos containing materials.

### ***Re-inspection Surveys.***

Subsequent to an initial Management (or Refurbishment) survey, Re-inspection surveys are conducted periodically to check the condition of any ACMs identified (or presumed) during the original assessment/ accumulated previous survey data. Frequency of re-inspection will be in accordance with the council's re-inspection protocol (see section 5.10 of this AMP).

Where a ACMs condition may have changed, the Material and Priority assessment(s) will be amended in accordance with the findings of the re-inspection, a new Risk Code and management strategy applied/ acted upon, and the premises' asbestos register updated regardless of outcome.

For sub-let corporate properties where the council do not have a retained/ ongoing management obligation (as defined under the specific terms of the business tenancy/ lease), following initial survey and completion of any immediate ACM related abatement work recommended, the council will not undertake further ACM monitoring until the end of the term of the lease. When issuing copies of the initial survey report to the business leases concerned. The Council will therefore remind them of their statutory obligation to periodically monitor the condition of the ACMs identified. The suite of standard letters

incorporating this written advice. All such letters issued will be retained on property file in each case.

## 5.4 Re-Inspection of Identified ACMs

ACMs identified to any property shall be visually re-inspected in accordance with a pre-determined inspection regime, to ensure that the original assessment of these materials is still applicable, that any associated risks have not altered and thus, that the recommended management action(s) for these materials are still valid.

The management survey for the premise (domestic/ non-domestic) will indicate the re-inspection cycle by applying the council’s Asbestos ACM Re-Inspection Cycle below.

The council’s inspection cycle will be reviewed as part of the annual compliance review criteria shown in **Appendix 6**, and maybe subject to revision based upon the findings of re-inspections undertaken.

The following table recommends the re-inspection frequency for ACMs against their assigned risk band.

<b>Council Asbestos ACM Re-Inspection Cycle:</b>					
<b>CBC Risk Code:</b>		<b>Non-Domestic Areas (Communal):</b>	<b>Domestic Areas (AIB only):</b>	<b>Domestic Areas (Non-AIB):</b>	
<b>A</b>	<b>High Risk</b>	<b>N/A Remove/Encapsulate</b>	<b>N/A Removed/Encapsulate</b>	<b>N/A Remove/Encapsulate</b>	
<b>B</b>	<b>Medium Risk</b>	<b>12 months</b>	<b>12 months</b>	<b>12 months</b>	
<b>C</b>	<b>Low Risk</b>	<b>24 months</b>	<b>12 months</b>	<b>60 months (nominal 20%)</b>	
<b>D</b>	<b>Very Low Risk</b>	<b>24 months</b>	<b>12 months</b>	<b>60 months (nominal 10%)</b>	
<b>E</b>	<b>No Asbestos</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	

Where possible AIB material is to be removed from domestic areas during major refurbishment works and also on void properties.

ACMs falling under Risk Category ‘B’ and identified as in ‘poor condition’, or with a ‘damage score’ of 3, will be attended within the timescale recommended (in the survey report) and any damaged areas encapsulated/ repaired/ sealed practically. It is anticipated most of these occurrences will then drop into risk category ‘C’.

The frequency of re-inspection shall be increased to that deemed as appropriate when a material shows deterioration subsequent to the previous inspection record and could also have moved up to the next Risk Code. Should the aforementioned process be seen repeatedly for a given material, then that material is considered for removal prior to reaching Risk Code A.

Re-inspections shall only be conducted by the personnel deemed competent. Any such person must have sufficient training, knowledge and understanding of ACMs to be able to do this effectively on behalf of the council. This means the nominated person should hold at least a British Occupational Hygiene Society proficiency module of P402 'Building Surveys' and sufficient practical experience to comply with HSG264. In practice this will be undertaken either by named council technical staff/ surveyors following suitable training, experience and mentoring, and/or by the appointed Asbestos Survey Company (ASC).

When assessing the condition and treatment of asbestos materials, it is the release of fibres into the air, which requires most careful consideration. The following may give rise to fibre release and will therefore be considered as part of ACM re-inspection:

- (i) The material is being disturbed (for example if it is in a prominent position and prone to accidental damage).
- (ii) The surface of the material is damaged, frayed or scratched.
- (iii) The surface sealant is peeling or breaking off.
- (iv) The material is becoming detached from its base (this is a particular problem with pipe and boiler lagging and sprayed coatings).
- (v) Coverings designed to protect the asbestos are missing, removed or damaged.
- (vi) There is evidence of asbestos dust or debris in the immediate surrounding area to ACMs. This can be a problem where previous asbestos remediation work has been insufficiently thorough.
- (vii) Moisture/water damage is causing breakdown of the material.

Changes in occupancy or use of facilities will also be considered as a relevant factor as part of the re-inspection survey. This may potentially alter the rating for vulnerability and/or the frequency of use, particularly when considering corporate properties (open to the public or places of work) and for communal areas associated with housing, but not for domestic areas.

## 5.5 Material Risk Assessment (MRA Algorithm)

For consistent management of the ACMs identified, a Material Risk Assessment (MRA) is included within survey reports (compliant with HSG264).

The asbestos surveyor must provide this assessment as part of the survey report. The use of the material risk assessment (MRA) allows each ACM or presumed ACM to be scored and ranked in order of their ability to release fibres if disturbed.

HSG264 recommends the use of an algorithm to carry out the Material Assessment (MRA). The algorithm is a numeric way of taking into account several influencing factors with the scores being totalled to give a separate Material Risk Assessment score (1 to 12) for each individual ACM.

Details of the criteria and the scoring system employed are given in **Appendix 5**.

## 5.5.1 Priority Risk Assessment (PRA Algorithm)

A Priority Risk Assessment (PRA) is also included as part of the survey (in accordance with HSG227) and a default scoring regime applied by the Council for consistency. The PRA determines the risk of exposure from any fibre release and so prioritises any consequential management actions/ remedial works.

HSG227 recommends the use of a suggested algorithm to carry out the Priority Assessment (PRA) consistently. This aspect considers the future likelihood of the ACM, or presumed ACM, to become damaged or disturbed by staff, visitors, building users, maintenance contractors etc. Details of the criteria assessed and the scores to be applied to calculate the Priority Assessment are given in **Appendix 5**.

The priority assessment (PRA) identifies those materials that are most likely to cause exposure of the occupants within a building to asbestos fibres.

The priority assessment (PRA) considers how likely it is for someone within the premises to disturb or damage the ACM resulting in fibre release. This may be affected by the use of the building (example the difference between a communal corridor within a block of flats, or a leisure centre, and a private hallway). A material assessment (MRA) conducted for an ACM which generated a high score, does not therefore automatically mean that those materials should be given priority for removal or encapsulation/ repair.

The council has adopted a default fixed set of Priority Assessment Scores to be employed for housing accommodation (domestic areas only – not communal). This is to ensure continuity of approach but can be overridden by the individual surveyor should exceptional circumstances warrant it. Full details of the scores to be employed are given in **Appendix 5**.

## 5.6 Overall Risk Assessment (Algorithm)

The `Material Assessment` (MRA) score is added to the `Priority Assessment` (PRA) to give an overall Risk Assessment (RA) score from which prioritisation of the management actions for ACMs, presumed or identified, can be developed as part of this AMP. Based on the overall Risk Assessment score, a `Risk Code` with an appropriate Management Action can be assigned to that material. This methodology and scoring protocol are then also reflected within premises' Asbestos Registers.

Note: This overall risk assessment provides a risk classification only to assist the Dutyholder in prioritising the risk from ACMs. Where an ACM is present, there is no “safe” score that will confer absolute freedom from risk to health.

The table given in **Appendix 4** summarises the indicative Management Action(s) that can be adopted/developed based upon the Risk Assessment for each type of identified or presumed ACM that may be present. They have been assigned to give general guidance as to the effective management of ACMs for the predicted remaining life expectancy and use of properties.

The overall Risk Assessment (RA) scoring, assigned Risk Codes and corresponding management actions that apply to a domestic situation are given within the following table:

<b>Council Asbestos ACM Risk Banding</b>			
(combined MRA + PRA = Total Risk and corresponding ‘Risk Band’ + Management Actions guide)			
<b>CBC Risk Band:</b>		<b>MRA* + PRA**:</b>	<b>CBC Management Actions (Guide):</b>
<b>A</b>	<b>High Risk</b>	<b>16 and over</b>	Restrict access and remove as soon as practicable.
<b>B</b>	<b>Medium Risk</b>	<b>11-15</b>	Medium risk material. Monitor condition periodically (or annually if AIB). Consider removal prior to maintenance or planned works.  If identified as in poor condition, or with a ‘damage score’ of 3, repair /encapsulate/ seal any damaged areas within recommended timescale.
<b>C</b>	<b>Low Risk</b>	<b>7-10</b>	Monitor condition periodically (or annually if AIB). Consider removal prior to maintenance or planned works.
<b>D</b>	<b>Very Low Risk</b>	<b>6 and under</b>	Monitor condition periodically (or annually if AIB). Consider removal prior to maintenance or planned works.
<b>E</b>	<b>No Asbestos</b>	<b>0</b>	No asbestos detected.

### High and Medium Risk Materials – Risk Codes A-B.

High and medium risk materials noted in the survey shall be subjected to remedial measures or removal as appropriate to effectively manage the material and prevent any possible exposure to asbestos fibres.

## Low and Very Low Risk Materials – Risk Codes C-D.

Low risk items can legally be worked upon or removed by personnel having a documented risk assessment, plan of work, documented training for this type of work, having the appropriate personal and respiratory protective equipment (PPE + RPE), can decontaminate themselves and the work area and understands the implications and requirements for generating, and the disposal of Hazardous Waste (all as per the requirements of CAR 2012 and the Hazardous Waste Regulations 2005).

If liable to damage during the process of removal, notification for some of this work will still be required to the HSE (on-line) before it commences all in accordance with the 'Notifiable Non-Licensed Work' (NNLW) category set out within CAR 2012, and the CBC Asbestos Remediation / Removal Works Commissioning Procedure (see list at section 6).

No Survey Data - prior to works.

Where no asbestos information or survey report exists which is relevant to the work proposed (and sufficient to complete the dynamic risk assessment required to proceed), works should be postponed until after an appropriate survey has been commissioned, completed and results reported. In some cases, there will be no requirement to commission survey data i.e. where the property was built post 1999, or if the work will not disturb a potential ACM (example: work to masonry).

For emergency work where a survey cannot be conducted in time, the contractor shall consult the premises' asbestos register.

Pending a full survey, the contractor will also be instructed that other ACMs may be present within the building. Materials found which *could* contain asbestos (by age and type) must be presumed to be asbestos, until proven otherwise by survey/ analysis (see section 5.4.2). Only at this point may works be progressed appropriately.

The contractor (and their operatives) is required to have undergone suitable Asbestos Awareness / refresher training within the last 12 months (compliant with the provisions of ACoP L143). This is in part intended to ensure that during an emergency situation that the potential for a suspect ACM can and will be appreciated/ identified by the operative concerned before disturbance.

If in doubt when on site, the appointed Asbestos Surveying Company (ASC) are contracted and will provide advice or attendance when required.

Further detail in respect of who will assist and what processes are to be followed in the event of an emergency can be found within the Asbestos Emergency Procedure.



## 5.7 Using Asbestos Survey Information

All asbestos survey data will be made available to those that need to use and view the information. Please refer to roles and responsibilities and advice and recommendations contain within survey reports.

## 5.8 Asbestos Register Data

The accumulated asbestos survey data is made available to those that need to use it via each premises' asbestos register.

The asbestos register is to be made available and communicated as applicable to employees, contractors, consultants and emergency services.

The registers contain all known information on the location and condition of asbestos, or materials presumed to contain asbestos, along with the associated risk assessment and materials confirmed that do not contain asbestos.

Where necessary while on site, operatives (and staff) can also access summarised asbestos register information and the originating pdf survey reports upon their hand-held devices via shared folder or by contacting the premise manager (responsible person).

What management action is recommended (e.g. repair/ encapsulate/ seal/ remove etc) will be indicated and must be taken as being the most appropriate action for that material in that property. Any deviation from this action must be discussed and agreed with the council (see section 5.3.1 previously).

**Areas NOT accessed at the time of the survey will also be detailed in the register and must be presumed to contain ACMs until proven otherwise. Be careful to note the caveats and other survey limitations noted within each survey report.**

### 5.8.1 Monitoring Data Access/ Use/ Updating

The asbestos register must be referred to whenever work is ordered to ensure any potential of asbestos being present is communicated to and anticipated by all involved.

The 'Asbestos Compliance + Quality Audit Procedure' (listed at section 6), provides base information to assess how often contractors (or staff) are appropriately referring to the asbestos information in relation to work undertaken.

Where asbestos has been removed, the premise' asbestos register shall be updated. For fully licensed work the appointed Asbestos Survey Company [ASC] (who is also appointed to supervise work on site), will details to the council to update the asbestos register. (including that undertaken by HPS), relevant information (including 'statements of cleanliness'/ consignment notes etc.)

are to be collated by the staff member responsible for the work and stored within the property's asbestos documentation e.g. as an individual project file.

All historic records (including consignment notes and air test certification) will be retained as an audit trail of previous activities and for legal purposes in the case of any possible legal actions in the future.

## 5.9 Hierarchy of Control - Recommended Management Procedures

Once the overall risk assessment has been carried out, priorities for remedial action are determined as described above. The overall hierarchy of control measures (which may be referred to within individual survey reports) are set out below:

### (i) Leave In-Situ and Manage

If the material is in sound condition and presents no risks to health, not subject to abrasion or deterioration, the material shall be left undisturbed and where appropriate re-inspected periodically.

### (ii) Repair, Seal, Encapsulation and Manage

If the material is slightly damaged but otherwise in sound condition and will not be subject to further damage, or in a position where will not cause a risk to health if left untreated, it may be repaired or sealed by an approved method.

Periodic re-inspections will then be conducted to ensure condition does not deteriorate. Inspections will be visual to avoid unnecessary disturbance of the material and will not involve removal of covering material, i.e. duct panels or ceiling tiles.

### (iii) Remove

If the material is in such a condition or location that it represents a current or future risk to health, or is likely to be disturbed by maintenance work, it should be removed by an approved method. This may include materials which may later be disturbed as part of planned work or refurbishments.

**Any such ACM which was originally installed to act as fire protection or insulation shall then be replaced with suitable non-asbestos containing replacement materials which will provide a similar level of protection.**

Care may be required to ensure any CDM relevant 'design' element associated is recorded/ documented in compliance with the council's control of contractor's policy.

## 5.10 Management Systems for ACMs

The council has adopted a '**Safe System of Work**' in the management of ACMs. This is structured around senior management, maintenance staff, HPS staff, and contractors reviewing the premises' Asbestos Register prior to the commencement of any works. Corresponding details are provided within the detailed procedures (see section 6).

Notwithstanding all other processes, the legal default under CAR 2012 and the Council's default policy position is that where there is doubt if a material is an ACM or not, **it should be presumed to be an ACM until proven otherwise.**

## 5.11 Unplanned Disturbance of ACMs (Emergency Procedures)

The council's AMP, Policy and Procedures are to be followed, so that ACMs are not unintentionally disturbed.

Should known or suspected ACMs be disturbed such that they may release fibres, the location must be immediately isolated or secured to prevent access. See the council's Emergency Works Procedure for further information (see section 6).

The Responsible Person, Dutyholder and the Health, Safety and Risk team (if in HPS, the project safety team also) within the Council is to be notified immediately. Further examination and advice shall be provided by the appointed asbestos Survey Company (ASC) where appropriate, including recommendations for removal, treatment, or decontamination.

## 5.12 Planned Disturbance of ACMs

Planned disturbance of ACMs may be necessary when undertaking projects such as building works, responsive repairs, installing and maintaining services, carrying out refurbishment work etc.

The risk associated with disturbing an ACM is related to nature of work proposed, its duration and the individual ACM concerned. Care is required therefore to correctly determine which contractor is appropriate (licensed or otherwise), what processes are required by the HSE (including type of potential 'notification'), that the Risk Assessment and Method Statement (RAMS) proposed are appropriate, and the nature of independent supervision necessary (audit trail, including air testing, certification etc. where necessary).

The activities of the Asbestos Removal Company (ARC) and the Asbestos Survey Company (ASC) will be subject to independent sample audit by the Asbestos Compliance Specialist (ACS) as set out within the CBC Asbestos Compliance + Quality Audit Procedure (see section 6). Similarly, the approved non-licensed work (NLW) tasks which can be undertaken by the HPS team, will be subject to independent sample audit.

The summary process (shown overleaf) is to be followed when commissioning asbestos related work to ensure continuity of compliance approach and to ensure any relevant asbestos works are reflected in the Asbestos Register upon completion.

## 5.13 Commissioning asbestos related work (summary stages):

Dependent upon the nature of ACM and extent of work involved, specialist licensed contractors, documented air monitoring and HSE notification may be required. Therefore, the costs for the appointment of the licensed asbestos Removal Company (ARC) and independent air testing laboratory (typically the Council appointed Asbestos Survey Company [ASC]), as well as any delay that might be generated by the 14-day period for notification of any fully licensable works, need to be incorporated into the project programme and budget.

Nb. any contractor (licensed or otherwise) undertaking work to an ACM on any site shall carry out a RAMS with which to produce a Plan of Works relating to those tasks proposed. This will also include void property related works.

## 5.14 Control of Contractors

For policy information and guidance on the control of contractors refer to corporate council control of contractor guidance. For further advice and support, contact your H&S adviser. The council also employs HPS staff (as an internal contractor) who are specifically trained and competent to undertake a limited number of 'approved' non-licensed asbestos tasks.

CDM Regulations requires that any person undertaking 'design' should always consider the risks from exposure to ACMs. If the ACMs are removed as preparatory works for a project, this work will be subject to the CDM Regulations as it is considered to be part of the main project i.e. Notification to the HSE and the requirement to produce a health and safety plan will apply to this element of the work.

## 5.15 Labelling Protocol

As a component of the Councils 'Safe System of Work', it has been concluded that in order to lessen the likelihood of accidental damage to areas where an asbestos 'A' label has inadvertently been removed or painted over, **CBC will not employ the use of 'A' labels.** For consistency of compliance approach therefore, the Council insists that in **all** circumstances the Asbestos Register should be referred to/ consulted. There is no legal necessity to label ACMs, provided an appropriate alternate safe system of working is in place.

This approach has also been adopted in part to avoid causing undue alarm to our domestic tenants as well as other customers using/ occupying corporate or commercial buildings, offices and flats, but also to prevent over reliance upon labelling in areas where these labels are less easily controlled/ maintained.

Any exceptions to this protocol (for specific corporate buildings) will be clearly detailed within any premise Asbestos Register but are to be avoided in all but exceptional circumstances. In these limited cases, the label, or labels, will be applied in a conspicuous position to ensure maximum effect in warning those

present. During the re-inspection of these materials the condition and position of the warning label will also be checked to ensure that it is serving its designated purpose, with new labels applied as required.

## 5.16 Disposal of Asbestos Waste

The general context of work involving asbestos material, the differing categories of work arising and what control measures this entails is provided within the appendix of the Council's Asbestos Remediation / Removal Works Commissioning Procedure (listed at section 6). What work is likely to necessitate waste consignment notification is similarly summarised within the procedure.

All materials containing asbestos at a concentration of more than 0.1% w/w are designated as 'Hazardous Waste' under the Hazardous Waste Regulations 2005. Therefore, any ACMs removed from a property must be treated and disposed in accordance with the aforementioned Regulation. Asbestos must be segregated from other wastes and securely stored and identified whilst it remains on site.

Notification is required to be given to the Environment Agency for their transfer and disposal if the amount generated from a property which will exceed 500kg per annum. Smaller volumes are usually managed under the licensed contractors own 'mobile operating' waste registration issued to their head office.

All friable asbestos waste likely to easily release free asbestos fibres, must be sealed in a suitable impervious material (i.e. 1000+ gauge polythene) or double bagged in an inner 500 gauge red and an outer 500 clear polythene bag bearing the appropriate asbestos and hazardous waste warning labels.

Non-friable asbestos waste (encapsulated or firmly bound in a material matrix, e.g. a sink pad) maybe contained by a single layer of 500 gauge polythene bearing the appropriate asbestos and hazardous waste warning labels.

Asbestos must be segregated from other wastes and securely stored and identified whilst it remains on site.

Upon the removal, transport and disposal of the waste, a copy of the consignment note shall be passed to and retained by the relevant appointed Responsible Person to be kept within the file for those removal works and recorded within the premise' asbestos files.

The Responsible Person is to ensure that all removal information is updated on the premise asbestos register and documentation stored and retained. His includes the associated certification (including consignment note) attached to the system for scrutiny by all register users. This includes non-licensed asbestos removal undertaken by HPS.

Further detail in respect of the arrangements and processes regarding the safe disposal of asbestos waste arising from work is covered in more detail within the corresponding Council Asbestos Remediation / Removal Works Commissioning Procedure.

## 5.17 Distributing Asbestos Information

The following shall be employed to ensure that all necessary parties receive adequate information as to the presence of identified or presumed ACMs to each property.

In summary the following will apply:

- A. Asbestos Information will be recorded and kept up to date upon the premises' Asbestos Register.
- B. Asbestos information shall be communicated to all persons that require this information. Including council officers and external third parties as necessary/relevant.
  - i. Responsible Person must read the Communications Strategy: Informing Residents/Customers about Asbestos.
- C. Access to the premise asbestos register shall continue to be directly available to all those that need to use it.
- D. No planned, responsive, voids, servicing, cyclical, or adaptation works should be allowed to go ahead without reference to the premises asbestos register.
- E. Staff involved in planned works or maintenance should consult either the supplied asbestos information extracts or access the premise asbestos register/survey reports. This will enable appropriate RAMS to be developed and reviewed prior to commencing work.
- F. Any actions, removals or ACM condition updates MUST be recorded in the project file (together with supporting documentation/ certificates where appropriate).
- G. The Responsible Person will be responsible in ensuring any updates are made to the premise asbestos register for properties after the completion of any removal works.
- H. It is the responsibility of the Responsible Person concerned to ensure information updates e.g. removal, repair, or inclusion of waste consignment notes / air clearance certification / HSE notification, are made to the premise asbestos register immediately following asbestos removal, or treatment works.

## 5.18 Training

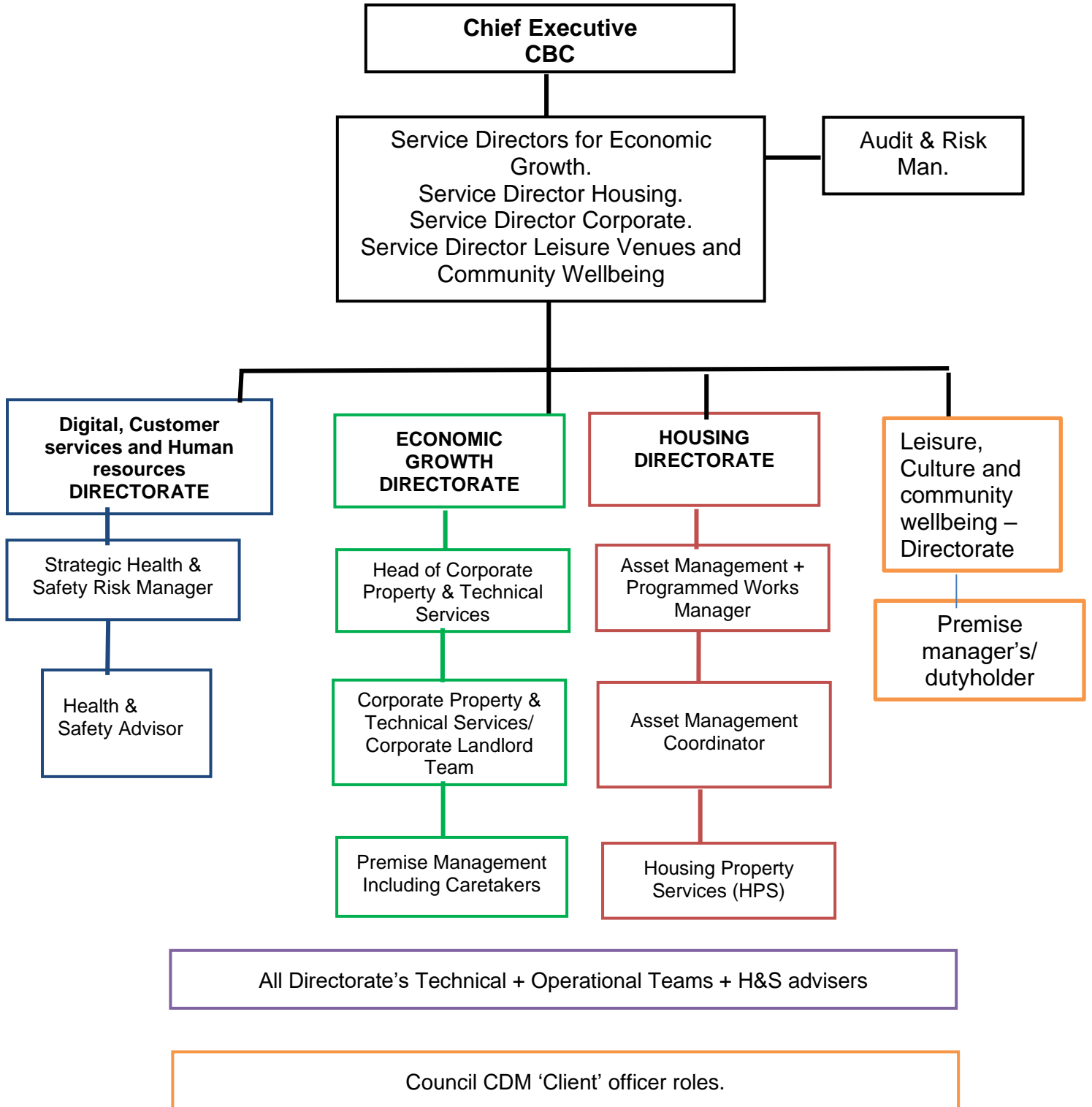
The council (Dutyholders/Responsible Persons) shall ensure that adequate asbestos related information; instruction and training are given to all employees and will undertake regular training of managers and staff, regular building users and contracted third parties, where necessary to ensure that the information is effectively disseminated and to ensure that training has been undertaken practically.

Asbestos training is to be undertaken for staff, and those who manage staff, who may come into contact with ACMs, or who in any way contribute to the council's responsibility to manage. Asbestos training is mandatory for some as required under regulation 10 of the CAR 2012 (and ACOP L143). A clear asbestos training matrix will be maintained by the Council and will clearly identify the level and frequency of training required for each relevant position. All identified staff must therefore attend a suitable course and/or subsequent 'refresher training' as set out within the Council Training Matrix at **Appendix 7**.

All asbestos training should be documented on personal files / council corporate training databases. Training records are required to be maintained and available for audit purposes.

## APPENDICES

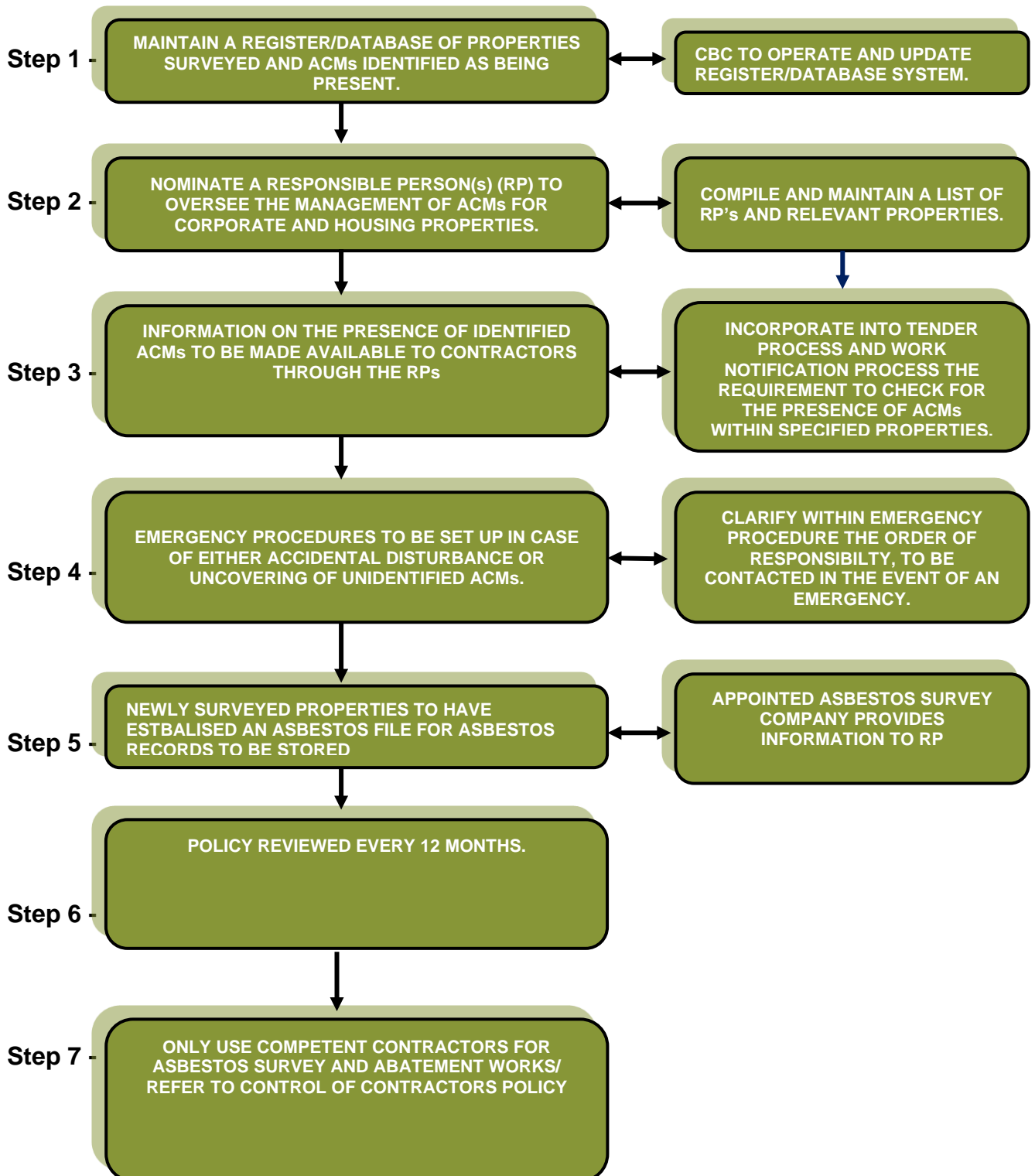
### Appendix 1 – CBC Responsibility Structure for the Management of Asbestos Containing Materials





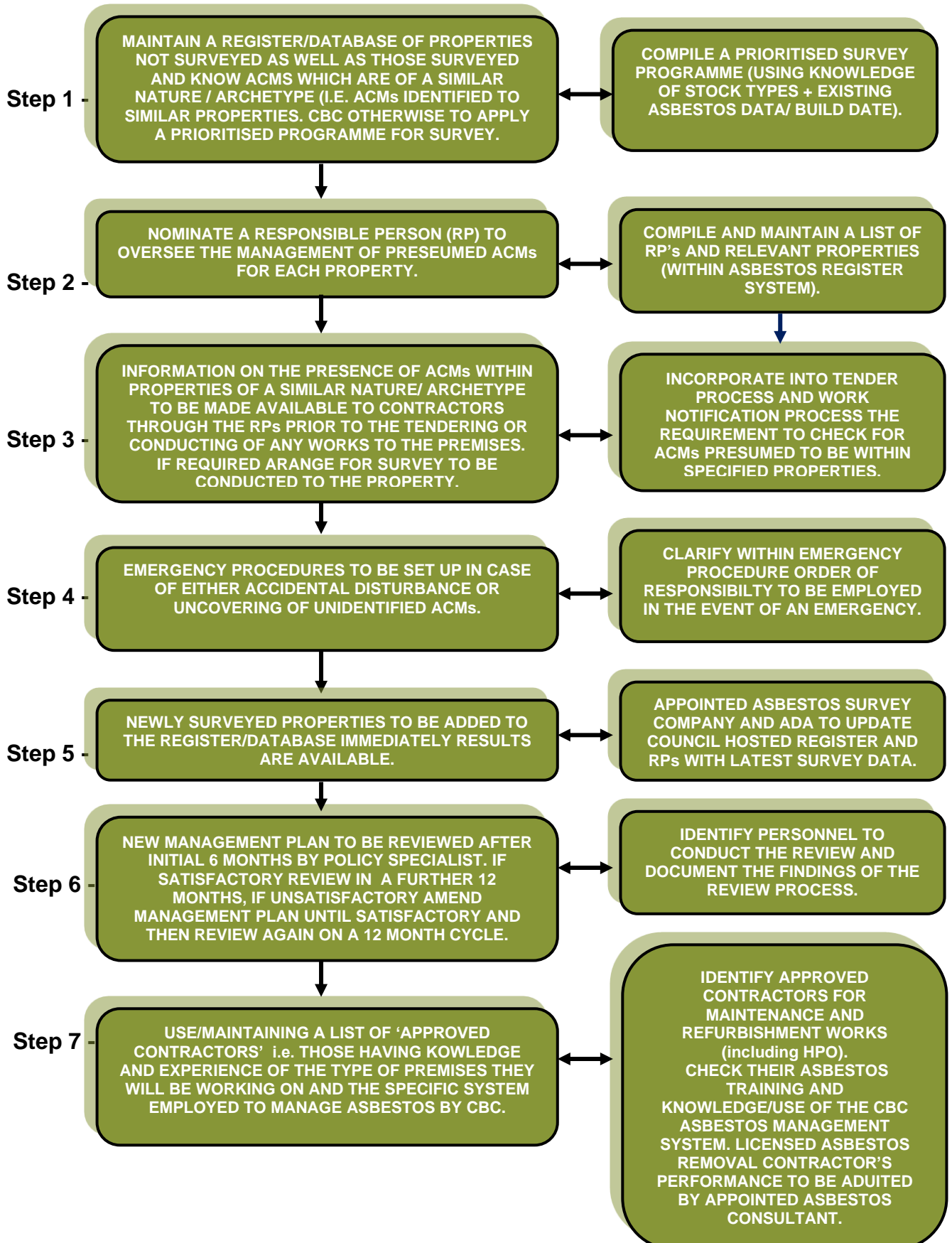
## Appendix 2 - Diagrams for the Management Strategies for Surveyed and Non-Surveyed Council Properties

### MANAGEMENT STRATEGY FOR ACMs WITHIN **SURVEYED** COUNCIL PROPERTIES



Appendix 2 Continued .....

**MANAGEMENT STRATEGY FOR ACMs WITHIN 'NON-SURVEYED'  
CHESTERFIELD BOROUGH COUNCIL PROPERTIES**



## Appendix 3 - ACMS to be Presumed Present within Non-Surveyed Council Properties

Material	Period Most Typically Used in Buildings
Mastic pad to underside sink.	1960's to 2000.
Floor tiles or Vinyl flooring.	1950's to 1992.
Stair nosing.	1950's to 1980s.
Bakelite toilet cistern.	1900 to 1992.
Textured coatings.	1950's to 1984.
Gasket to pipe work and boiler.	1860's to 1999
Cement (or less commonly AIB) undercloaking to edge of roof.	1900 to 1980's.
Cement (or less commonly AIB) soffits.	1900 to 1980's.
Cement roof sheet external.	1900 to 1999.
Cement water tanks.	1900 to 1999.
Cement flue pipe and cowls.	1900 to 1999.
Cement panels to ceiling and fireplaces.	1900 to 1999.
Electrical switch gear.	1900 to 1980's.
Paper lining beneath man-made mineral fibre insulation or flooring.	1950's to 1992.
Rope to skylight.	1900 to 1980's.
Insulation board infill panels to surrounds to fires, walls of cupboards, basement ceilings, lining panels to doors, boxing, and within dumb waiter.	1860's to 1980.
Fire Doors or insulation board lining panels to doors.	1860's to 1980.
Lagging to pipe work.	1860's to 1980.
'Eternit' windowsills.	1900 to 1993

Asbestos materials have been used in construction since 1200, and although most significant commercial use commenced in the UK in the mid 1800's, it was not until the 1970's that the banning of the use of asbestos products started. The dates/ periods shown above provide an indication as to when materials were most commonly used, however it must be remembered that there were exceptions outside of these dates and old stocks of material were also sometimes employed after a material was officially banned.

## Appendix 4 - ACMS likely to be Present within Council Properties, Associated Risk Level, and Recommended Management Actions

Material	Risk Level*	Management Action(s)	Responsibility
Mastic pad to underside sink.	Very Low	Re-inspect at a frequency according to the level of risk.	Relevant R.P.
Floor tiles.	Very Low	As above.	Relevant R.P.
Stair nosing.	Very Low	As above.	Relevant R.P.
Bakelite toilet cistern.	Very Low	As above.	Relevant R.P.
Textured coatings.	Very Low	As above. Paint areas of minor damage.	Relevant R.P.
Gasket to pipework and boiler.	Very Low	Re-inspect at a frequency according to the level of risk.	Relevant R.P.
Cement undercloaking to edge of roof.	Very Low	As above.	Relevant R.P.
Cement soffits.	Very Low	As above.	Relevant R.P.
Cement water tanks.	Low	As above.	Relevant R.P.
Cement roof sheet.	Low	As above. Encapsulate areas of minor damage.	Relevant R.P.
Cement flue pipe and cowls.	Low	As above.	Relevant R.P.
Cement panels to ceiling and fireplaces.	Low	As above.	Relevant R.P.
Insulation board soffits.	Low	As above.	Relevant R.P.
Electrical switch gear.	Low	Re-inspect at a frequency according to the level of risk.	Relevant R.P.
Rope to skylight.	Medium	As above.	Relevant R.P.
Insulation board to ceilings, walls of cupboards etc. and surrounds to fires.	Medium	As above. Encapsulate areas of minor damage.	Relevant R.P.
Paper lining beneath man-made mineral fibre insulation.	Medium	Re-inspect at a frequency according to the level of risk.	Relevant R.P.
Insulation board lining panels to doors, or door header panels (above doors).	Medium/High	As above. Encapsulate areas of minor damage. Remove if damage is significant.	Relevant R.P.
Lagging to pipe work.	Medium/High	As above.	Relevant R.P.

\* Risk Rating is based upon the type of material and also presuming it to be in a sound condition. Damage to ACMS, loss of sealant will increase the risk that they pose and thus change their Risk Rating.

## Appendix 5 - Material and Priority Assessments

### Material Assessment (Algorithm) – from HSG264.

The material risk assessment considers the following criteria:

- **Product type**
- **Extent of damage**
- **Surface treatment and**
- **Asbestos type**

Sample Variable	Score	Examples of Scores
<b>Product Type (or debris from product)</b>	1	Asbestos-reinforced composites (plastics, resins, mastics, roofing felts, vinyl floor tiles, semi rigid paints or decorative finishes.
	2	Asbestos insulating board, millboards other low density insulation boards, asbestos textiles, gaskets, ropes and woven textiles, asbestos paper and felt.
	3	Thermal insulation (e.g. pipe and boiler lagging) sprayed asbestos, loose asbestos, asbestos mattresses and packing
<b>Extent of Damage / Deterioration</b>	0	Good condition: no visible damage.
	1	Low damage: few scratches or surface marks, broken edges on boards, tiles etc.
	2	Medium damage: significant breakage of materials or several small areas where material has been damaged revealing loose asbestos fibres.
	3	High damage or delamination of materials, sprays and thermal insulation. Visible asbestos debris
<b>Surface Treatment</b>	0	Composite materials containing asbestos: reinforced plastics, resins, vinyl tiles.
	1	Enclosed sprays and lagging, asbestos insulation board (with exposed face painted or encapsulated), asbestos cement sheets etc.
	2	Unsealed asbestos insulating board, or encapsulated lagging and sprays.
	3	Unsealed laggings and sprays
<b>Asbestos Type</b>	1	Chrysotile
	2	Amphibole asbestos excluding crocidolite
	3	Crocidolite

Each of the parameters is scored and added to give a total between 2 and 12:

Materials giving the following scores can be rated as to the risk that they represent in releasing fibres if the material is disturbed.

**10 or more** - should be regarded as **HIGH** risk with a significant potential to release fibres if disturbed

**between 7 and 9** – This score is regarded as **MEDIUM** Risk

**between 5 and 6** - This score is regarded as **LOW** Risk.

**4 or Less** – This score is regarded as **VERY LOW** Risk

### Priority Assessment (Algorithm) - HSG 227.

The management priority must be determined by carrying out an overall Risk Assessment which takes account of such factors as:

- **Occupancy Activity** – The main type of use of the area and the activities needs to be considered. For example, a little used storeroom will rarely be accessed and so any asbestos is unlikely to be disturbed. At the other end of the scale, in an office lined with asbestos insulating board panels with frequent movements, the potential for disturbance is high.
- **Likelihood of Disturbance** – Two factors to be taken into consideration are the amount or extent of asbestos and its vulnerability/accessibility. For example, outdoor soffits are generally inaccessible without the use of ladders and are unlikely to be disturbed. Whereas panels on internal walls would be much more likely to be disturbed by persons moving about the premises.
- **Human Exposure Potential** – This considers three factors in the area; 1) number of occupants in the area; 2) the frequency of usage; and 3) the average time each area is in use. For example, a boiler room is most likely to be unoccupied, but may be visited daily for a few minutes. The potential for exposure is much less than an office which is occupied by many people for many hours per day.
- **Maintenance Activity** – This is the most important area for consideration in respect to level of maintenance activity likely to take place in an area. Electricians, plumbers and carpenters are the tradesmen with the highest risk of exposure to asbestos. Planned maintenance can be assessed and carried out using procedures and controls to reduce exposure to asbestos. Where unplanned reactive maintenance is required the controls that can be applied may be more limited. The frequency of maintenance activities needs to be taken into consideration in deciding what management action plan to employ.

The scores to be applied to each Priority Risk Assessment criteria are given in the following table (taken from HSE HSG227):

Assessment Factor	Score	Examples of Score Variables
<b>Normal Occupancy Activity</b>		
Main type of activity in area	0	Rare disturbance activity (e.g. little used storeroom).
	1	Low disturbance activities (e.g. office type activity).
	2	Periodic disturbance (e.g. industrial or vehicular activity).
	3	High levels of disturbance, (e.g. fire door with asbestos insulating board sheet in constant use).
Secondary activities for area	As above	As above.
<b>Likelihood of Disturbance</b>		
Location	0	Outdoors – external.
	1	Large rooms or well-ventilated areas.
	2	Rooms up to 100m <sup>2</sup> .
	3	Confined spaces.
Accessibility	0	Usually inaccessible or unlikely to be disturbed.
	1	Occasionally likely to be disturbed.
	2	Easily disturbed.
	3	Routinely disturbed.
Extent/amount	0	Small amounts or items (e.g. strings or gaskets)
	1	≤10m <sup>2</sup> or <10m pipe run
	2	>10m <sup>2</sup> to ≤50m <sup>2</sup> or >10m to ≤50m pipe run
	3	>50m <sup>2</sup> or >50m pipe run
<b>Human Exposure Potential</b>		
Number of occupants	0	None.
	1	1 to 3
	2	4 to 10
	3	>10
Frequency of use of area	0	Infrequently.
	1	Monthly.
	2	Weekly.
	3	Daily.
Average time area is in use	0	<1 hour.
	1	>1 to <3 hours.
	2	>3 to <6 hours.
	3	>6 hours.

**Priority Risk Assessment criteria: Continued .....**

<b>Maintenance Activity</b>		
Type of maintenance activity	0 1 2 3	Minor disturbance (e.g. possibility of contact when gaining access) Low disturbance (e.g. changing light bulbs in asbestos insulating board ceiling) Medium disturbance (e.g. lifting one or two asbestos insulating board ceiling tiles). High levels of disturbance (e.g. removing a number of asbestos insulating board ceiling tiles to replace a valve or for recabling).
Frequency of maintenance activity	0 1 2 3	ACM unlikely to be disturbed for maintenance  ≤1 per year. >1 per year. > 1 per month.

\*



## Appendix 5 (continued): Council Default Priority Assessment Scores for all Domestic Properties.

	Normal Activity	Sec. Activity	Disturb/ Location	Access	Extent/ Amount	Number Occupants	Frequency of use	Average Time used	Maintenance Type	Freq.	Priority Score
Living Room	1	1	2	1	2	1	3	2	1	0	6
Dining Room	1	1	2	1	2	1	3	0	1	0	6
Kitchen	1	1	2	1	2	1	3	1	1	1	6
Hall	1	1	2	1	1	1	3	0	0	0	5
Pantry	0	0	2	1	1	1	3	0	0	0	4
Cupboard (1, 2, 3 etc.)	0	0	2	1	1	1	3	0	0	0	4
Store	0	0	2	1	1	1	3	0	1	0	5
Porch	1	1	1	1	1	1	3	0	1	0	5
Toilet	1	1	2	1	1	1	3	0	1	1	6
Bathroom	1	1	2	1	1	1	3	0	1	1	6
Stairs/ Landing	1	1	2	1	1	1	3	0	1	0	6
Bedroom 1	1	1	2	1	2	1	3	3	1	0	7
Bedroom 2	1	1	2	1	2	1	3	3	1	0	7

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	Normal Activity	Sec. Activity	Disturb/ Location	Access	Extent/ Amount	Number Occupants	Frequency of use	Average Time used	Maintenance Type	Freq.	Priority Score
Bedroom 3	1	1	2	1	2	1	3	3	1	0	7
Bedroom 4	1	1	2	1	2	1	3	3	1	0	7
Heater Cupboard	2	2	2	1	1	1	2	0	2	1	7
Garage	2	2	1	1	2	0	2	0	1	0	5
Cellar	0	0	3	1	1	0	2	0	1	0	4
Loft	0	0	3	1	1	0	1	0	1	0	4
External Store (1, 2, 3 etc.)	1	1	1	1	1	0	2	0	1	0	4
External	0	0	0	0	1	0	3	0	2	1	4
Roof	0	0	0	0	1	0	0	0	2	1	3

**Note:**

1) this spreadsheet will need updating to reflect any review / revisions following commencement of the new appointed Asbestos Survey Company (ASC) contract in 2022 and incorporation within the Council Premises Asbestos Register system

2) it should be noted that these tabulated 'default' priority risk assessment scores while following the HSE guidance criteria and scoring algorithm are not prescribed by the HSE as it is the requirement of the 'Dutyholder' (Council) to define them to reflect the nature of their properties, the occupants and their use.

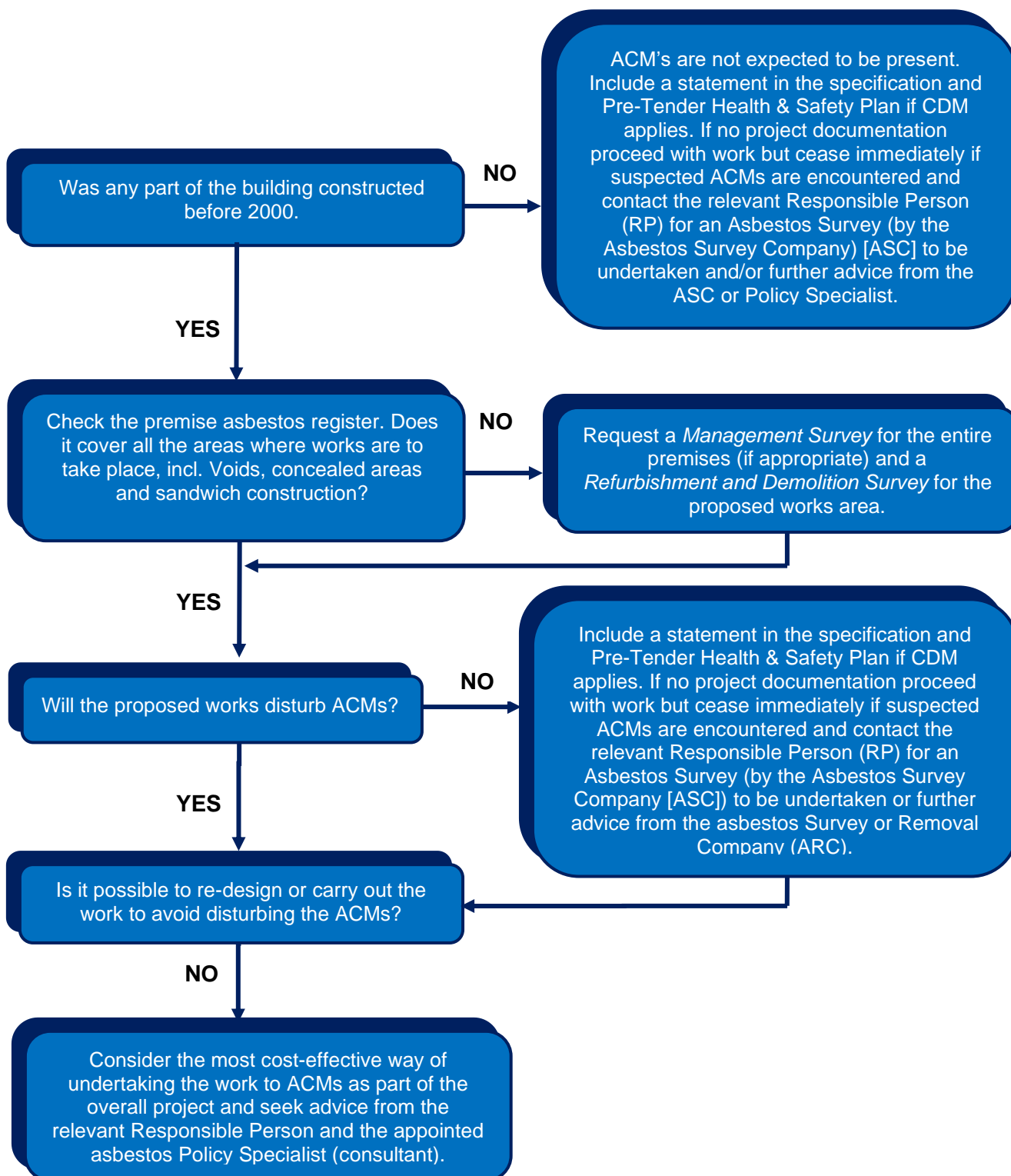
## Appendix 6– Council Asbestos Training Matrix

Type of Training	Staff Identified	Cycle/ Timing	Duration	Iteration	Qualification	Trainer
<b>P402- Asbestos Surveys + Bulk Samples</b>	AMP Policy Specialists	One off	3 Days	*1	BOHS P402 Certificate	UKATA certified/ IATP or equivalent
<b>Duty To Manage / Emergency Scenario (Council AMP + Procedures)</b>	Responsible Persons, AMP Owner, AMP Dutyholders, Deputy dutyholders. (see roles/ job titles at 5.2).	Periodic (Year one + every 5th year)	1 Day	5	Training Certificate	Appointed Asbestos Compliance Specialist (ACS)
<b>Asbestos Awareness eLearning (Category 'A')</b>	Those for whom classroom 'AA' training required (see above). Also, Housing/ Corporate/ Premise Managers/ Asset Management/ visiting officers and Call Centre Staff: any identified role that will be expected to communicate ACM issues (e.g. Environmental services, housing enforcement/environment, caretaking roles).	Annual (when not full classroom version)	N/A	Annual	'e-learning'	elearning package (internal) (or appointed Asbestos Survey Company [ASC])
Type of Training	Staff Identified	Cycle/ Timing	Duration	Iteration	Qualification	Trainer

# ASBESTOS MANAGEMENT PLAN

<p><b>Non-Licensed Works (Category 'B')</b></p>	<p>Staff, and those who manage staff, who through their role within CBC may come into contact with ACMs, or order/supervise work which could affect ACMs. Include Premise Managers and HPS staff/ operatives where relevant*.</p> <p>HPS staff, who are authorised to undertake <i>any</i> ACM related non-licensed work tasks. <i>*NOTE:</i> After first classroom 'AA' training completed, those undertaking 'Cat B' training do not require AA training as well.</p>	<p>Regular (Year one + annual TNA/ refresher)</p>	<p>1 Day</p>	<p>Annual</p>	<p>Training Certificate (year one classroom UKATA). Refresher annual</p>	<p>External supplier (or appointed Asbestos Survey Company [ASC] if UKATA certified/ IATP or equivalent)</p>
<p><b>P405 - Management of Asbestos in Buildings</b></p>	<p>Policy Specialists/ Deputy dutyholders (Housing / Corporate)</p>	<p>One off</p>	<p>3 Days</p>	<p>*1</p>	<p>BOHS P405 Certificate</p>	<p>UKATA certified/ IATP or equivalent, appointed via H&amp;SC (to meet CBC criteria)</p>

## Appendix 7 – Flow Chart for Projects where ACM’s may be disturbed.



See Key Considerations Overleaf

## **Flow Chart for Projects where ACM's may be disturbed.**

### **Key Consideration shall include: -**

- Is the work licensable, or notifiable non-licensed (NNLW)?
- Does the work fall under the terms of the CDM 2015 Regulations?
- Can the work be undertaken as preparatory work?
- Can HPS staff undertake this work as part of their approved non-licensed asbestos work activity?
- Will consideration need to be given for special programming?
- Has relevant information been provided to the Contractor?
- Contractors undertaking the work must develop a Risk Assessment and Plan of Work in accordance with Control of Asbestos Regulations 2012 (including CBC's 'in-house' operational maintenance team [HPO]).

The list of approved/ pre-vetted Council contractors is available from the appropriate Dutyholder and Responsible Person.

## Appendix 8 - Asbestos: The Health Hazards and Occupational

### Groups at Risk

Disturbing asbestos can release very small fibrous particles which, when airborne, can be breathed in. The fibres are not necessarily visible to the naked eye. Due to their small fibrous nature, the body's respiratory defence mechanism does not filter out all the fibres. Fibres may enter the lower parts of the lung where they may persist for years. It is recognised the more fibres that are breathed in, the greater the risk to health.

Breathing fibres over a period of time can eventually lead to the following diseases: -

#### **Asbestosis.**

This is scarring of the lung which reduces the lungs elasticity and leads to breathlessness. It is caused by a proportion of asbestos fibres inhaled reaching the deep lung and resulting in a thickening of the alveoli wall.

#### **Bronchial Carcinoma (Lung Cancer).**

This is a cancer developed in the lung. It is indistinguishable from lung cancers caused by cigarette smoking and other agents.

#### **Mesothelioma.**

This is a cancer which develops in the lining of the chest wall or abdominal cavity. It is linked to exposure to crocidolite and amosite asbestos fibres.

All the above asbestos related diseases are irreversible and may progress, even after cessation of exposure. A latent period of between 15 – 60 years is generally the norm. In the 1990's approximately 2000 – 3000 people died every year from asbestos related diseases. This is a consequence of exposure to asbestos in the 1960's/1970's and the long latency period.

Providing asbestos containing materials (ACM) are not damaged and fibres not released, the risk to health is minimal.

#### **Occupational Groups at Risk**

The main groups of workers currently at risk are:

- Demolition contractors
- Roofing contractors
- Construction contractors
- Heating and ventilation engineers
- Telecommunications engineers
- Fire and burglar alarm installers
- General maintenance staff, computer installers
- Building surveyors
- Electricians
- Painters and decorators
- Joiners
- Plumbers
- Gas fitters
- Plasterers
- Shopfitters

**END**