

# **Derby City Council**

# **Asbestos Management Plan**

Revision 6

April 2014

## Index of Contents

1.1	Introduction	3
1.2	Glossary of Terms	4
<b>2.0</b>	<b>Action Plan</b>	
2.1	Scope and purpose	6
2.2	Competent persons – who they are and how to contact them	6
2.3	Planning – Corporate planning methods	6
2.4	Interested parties	6
2.5	Actions and controls – controlling exposure to asbestos	7
2.6	Existing properties – data management strategy	7
2.7	New properties – data management strategy	8
2.8	Review of management plan	8
2.9	Records	8
<b>3.0</b>	<b>Identification and Location of Asbestos Containing Materials</b>	
3.1	Survey methods	9
3.2	Priority rating scheme	10
3.3	Location of registers / hard copy surveys	11
3.4	Electronic registers	11
3.5	Updating registers; methods and responsibilities	12
3.6	Monitoring and re-inspections	12
3.7	Labelling of Asbestos Containing Materials	12
3.8	What does my asbestos register tell me and what doesn't it cover	13
<b>4.0</b>	<b>The Council's expectations of organisations working on their behalf</b>	
4.1	Consultants & Professionals (not specialist in the field of asbestos)	14
4.2	Analysts, surveyors and laboratories	15
4.3	Specialist Contractors (licensed for work with asbestos)	15
4.4	Unlicensed Contractors	16
<b>5.0</b>	<b>Training and Awareness</b>	
5.1	What is asbestos? Common uses and health effects	17
5.2	Derby City Council training plan	20
<b>6.0</b>	<b>Work potentially involving asbestos – getting information to those who need it</b>	
6.1	Emergency procedures	22
6.2	The professional advisor – who they are and their responsibilities	24
6.3	The professional advisor and professional advice – what is the difference	24
6.4	Management options for dealing with asbestos	24
6.5	Risk assessment of Asbestos Containing Materials – when it is needed	25
6.6	Provision of information on the presence and condition of asbestos	26
6.7	Minor works guidance – how to carry out everyday tasks	27
6.8	Further works guidance – when is a job no longer 'minor'	28
6.9	Who to appoint	28
6.10	Safe removal procedures	30
<b>7.0</b>	<b>Appendices</b>	
7.1	Guidance Sheet 1 – Information for Employees	32
7.2	Guidance Sheet 2 – Information for Managers	35
7.3	DCC Corporate Management of Asbestos Policy	38
7.4	Regular monitoring of known accessible asbestos	42

## **1.1 Introduction**

Asbestos is the biggest occupational health problem ever encountered in the UK. Estimated annual deaths resulting from asbestos exposure are in the region of 3000 - 5000 per year. This number is expected to rise over the coming years.

Asbestos is a naturally occurring mineral that has been mined and refined for thousands of years and incorporated in to thousands of products throughout the world, the majority of which have found their way in to the UK over many years. It is present in many industrial, commercial and domestic premises throughout the UK. It estimated that almost 80% of the Council's surveyed building stock contain asbestos based materials.

Work with, and the management of asbestos is heavily regulated and as such a large number of legislative, guidance and best practice documents exist. The Control of Asbestos Regulations 2012 (CAR 2012) is the current basis for all related documentation, outlining the vital components of what is required of all individuals in the workplace. The 'Duty Holder' concept described in the CAR 2012 is the driving force behind the creation of this document, requiring the Council to clearly state its methods of management of asbestos and the provision of suitable information to those who need it.

The intention of this document is to incorporate all the various guidance previously issued into new and comprehensive information in this one document.

## **1.2 Glossary of Terms**

### **ACM or ACMs – Asbestos containing material(s)**

A general term to cover all materials containing asbestos

### **AMT – Asbestos Management Team**

The Asbestos Management team is part of the Property Design and Maintenance section within the Neighbourhoods directorate

### **ASBESTOS LICENSE**

Asbestos Licenses are issued by the Asbestos Licensing Unit of the HSE and permit organisations to work with licensable asbestos containing materials.

### **CAR (2012) – Control of Asbestos Regulations 2012**

### **CLASP – Consortium of Local Authorities Special Programme**

A programme for system built buildings. CLASP buildings often contain significant amounts of asbestos.

### **ENCAPSULATE**

Seal the surface of a material.

### **HSE – Health and Safety Executive**

The government body responsible for health and safety enforcement in most Council Properties.

### **HSG264 – Asbestos: The survey guide**

A method for surveying for asbestos, issued by the Health and Safety Executive.

### **UKAS – United Kingdom Accreditation Service**

An accreditation body, with the means to demonstrate organisations compliance with certain quality standards relating to asbestos work.

### **L143 – Managing and working with asbestos**

Published in late 2013 the ACOP (Approved Code of Practice) combines and replaces the 2 ACOP's L127 (The management of asbestos in non-domestic premises) and L143 (Work with asbestos containing materials). It provides updated guidance following the introduction of CAR 2012.

### **Licensed & Notifiable**

Asbestos removal needs to be carried out by a licensed contractor and all work should be notified to the HSE/Local Authority. For further information on the requirements see the HSE website.

### **Notifiable & Non Licensed (new for CAR 2012)**

Asbestos items that do not need a licence to work on them but do need to be notified to the HSE/Local Authority. Any individuals carrying out the work need a medical every 3 years and need records of exposure collected and maintained. All work needs to be risk assessed and all staff should have appropriate annual training.

**Non notifiable & Non licensed (new for CAR 2012)**

Asbestos items that do not need a licence to work on them and don't need to be notified to the HSE/Local Authority. Any work still needs to be risk assessed and all staff should have appropriate annual training.

## **2 Action Plan**

### **2.1 Scope and purpose**

This Management Plan has been produced to incorporate or give reference to all previous guidance issued by the Council. This is to provide a clear management message to all parties with an interest in the Council's management of asbestos. The 'Action Plan' details how the Council is to manage 'Asbestos Containing Materials' (ACMs) in its buildings over the coming years.

The prominent concept behind this plan is set out in Regulation 4 of the Control of Asbestos Regulations 2012 (CAR 2012), namely the identification of the 'Duty Holder' and "Duty Holder" for all of the Council's properties. The chain of responsibility within the Council is shown on page 5 of the Council's Asbestos Policy (attached as Appendix 7.3 to this document).

In the majority of cases, the role of the 'Duty Holder' at each site lies with the person in overall charge of the day to day running of any site. The Duty Holder for each site is defined in the Council's Asbestos Policy, appended to this document.

### **2.2 Competent persons – who they are and how to contact them**

The Council's 'Asbestos Management Team' (AMT) is headed by the Compliance Group Leader Compliance Group Leader and is based within Property Design and Maintenance, The Council House, Derby, DE1 2FS. The contact number for the AMT is 01332 640200. The email contact for the AMT is [asbestos@derby.gov.uk](mailto:asbestos@derby.gov.uk).

The administration of this management plan, any guidance issued under this plan, the Asbestos Policy and central records is held within the AMT.

In accordance with the Asbestos Policy, Property Design and Maintenance will ensure access is available to adequately trained and experienced individuals within the field of asbestos, either by direct appointment or contract.

### **2.3 Planning – Corporate planning methods**

On-going planning will be undertaken directly by the AMT and line management within Property Design and Maintenance. The AMT will openly consult at any time with any of the interested parties identified in section 2.4. All major planning decisions will be agreed by the Head of Service and the Director. The AMT reports to the Corporate Safety Committee as required to report on progress of the team.

### **2.4 Interested Parties**

The following individuals and groups have an interest in the management of asbestos within the Council. Each will have a different role to play dependant upon their position of appointment and extent to which they are involved in managing buildings and/or staff.

As a general rule, all interested parties have a duty under current regulations to look after both themselves and others and must not, by action or inaction, place any individual in the way of harm.

Details of certain roles and responsibilities with regards to asbestos management can be found in the Council's asbestos policy (appendix 7.3).

List of interested parties:

- The Council via the Cabinet
- The Chief Executive
- Individual Strategic Directors and Directors within departments
- Building / site managers and maintenance staff
- Head Teachers & Staff
- Governors
- Users of the Council's property, for example Community Centre Managers
- Safety Representatives
- Recognised Trade Unions
- Safety Committees or other assembled groups
- Regulatory bodies
- Project officers, including designers
- The AMT
- Contractors
- The Council's Insurers
- Members of the public

## **2.5 Actions and controls – controlling exposure to asbestos**

All work with asbestos is subject to CAR 2012, which imposes stringent controls on work with asbestos. All work with asbestos must have a specific risk assessment undertaken and a suitable plan of work prepared in advance regardless of the type of material being worked upon.

All work with asbestos must be carried out by an HSE licensed contractor (the status of any contractor's license can be inspected at <http://www.hse.gov.uk/asbestos/>) unless, under the advice of a member of the AMT or external asbestos consultant, a suitably qualified and insured individual utilising an appropriate plan of work for the material concerned. Including method statement, containment information and waste disposal information. Derby City Council has a procured schedule of rates for asbestos consultants and asbestos contractors who have been vetted and approved by the AMT. These lists MUST be used when carrying out work on asbestos on behalf of Derby City Council. Unless agreed with the AMT.

With the exception of minor works (subject to approval by the Compliance Group Leader), to ensure the working standards are suitable, an independent consultant from the list must be appointed to direct the contractor and certify the cleanliness of their work.

## **2.6 Existing properties – data management strategy (including disposal)**

All existing properties either owned by or leased by the Council will have an asbestos management survey carried out and a register of Asbestos Containing

Materials (ACMs) prepared for the property. All properties covered are logged on SAM.net, the Council's Asbestos Management Database which is administered by the AMT. A copy of the asbestos register for each building is held by the Duty Holder for that building. The AMT are currently updating the Management Surveys held on the asbestos database.

Upon disposal of a property or lease to another party, the current asbestos register should be issued formally to the new controller of the building and the AMT informed of the change.

Queries relating to the provision of asbestos registers should be addressed directly to the AMT. Queries regarding leases and maintenance responsibilities should be directed to the Estates Department of Derby City Council.

## **2.7 New properties – data management strategy (including acquisition)**

For the purposes of this Management Plan, new properties are defined as either 'new build' properties or a new purchase or lease by the Council. New build properties built after 2000 do not require an asbestos survey as legally, no ACM installation should have been used from the end of 1999 onwards.

All new purchases and leases must have an asbestos management survey undertaken if the building was built prior to 2000 and a survey is not already in place. Any relevant information regarding the extent of asbestos on the site should be sought prior to the signing of lease or purchase contract in order to identify any safety issues and extent of liability within the property. This must be arranged by the acquiring department's lead office for any 'newly' occupied building. Advice and guidance on this matter can be sought by contacting the AMT.

## **2.8 Review of Management Plan**

The head of the AMT will undertake a full review of this management plan on an annual basis to determine ongoing suitability and compliance with legislation. Changes to the Management Plan will be carried out by the head of the AMT and agreed with line management prior to issue of a new revision of the Management Plan. Trade Union representatives will be consulted via the Corporate Safety Committee. New revisions will then be issued to all Duty Holders made known to the AMT along with any reinspected asbestos surveys.

## **2.9 Records**

Property Design and Maintenance will ensure that all documentation supplied to the AMT in relation to asbestos is kept for a period of forty years from the date of its creation. All documentation relating work undertaken with asbestos within the Council's building stock should be copied to the AMT. It is important to note that this instruction applies to any individual acting in any capacity across Derby, regardless of employer. It is of paramount importance that a central, up to date register of asbestos is kept for years to come.

In turn, the AMT will openly cooperate with and, on request, provide available information to those planning work on the Council's building stock.



### 3 Identification and Location of Asbestos Containing Materials

#### 3.1 Survey Methods

The Council requires all survey work to be undertaken in accordance with HSE document HSG264 Asbestos: The survey guide; and in accordance with regulatory requirements as set down in CAR 2012.

All parties wishing to commission surveys are urged to do so via the AMT in order to ensure consistency of survey methods and reporting. The AMT may be able to offer direct surveying services from time to time, failing this, the AMT is in a position to organise or instruct an external surveying consultancy. The requirements of external surveying bodies are set out in section 4.2 of this document.

The AMT recognises four types of survey work, all of which require specific training; qualifications, experience and quality systems to be carried out safely and effectively:

1. **Re-inspection** - used as an on-going audit method of inspecting ACMs on site.
2. **Management survey, non-intrusive** – this is the standard survey type undertaken to produce an asbestos register. It is a non-intrusive method, and therefore should not hinder the occupancy of a building. Representative samples are taken of materials suspected to contain asbestos; subsequent analysis of these samples enables the presence or absence of asbestos to be confirmed. This type of survey covers all areas reasonably accessible without causing excessive delay to the surveyor or damage to the building. The height of survey varies between consultancies, a standard of 3.5m exists across the industry although the AMT prefer a full height survey and will ensure this is achieved when commissioning surveys so far as is possible.
3. **Pre demolition / major refurbishment survey, fully intrusive**,– this is a fully intrusive survey and as such will disrupt the operation of the building and the integrity of the building fabric and furnishings.
4. **Pre demolition / major refurbishment survey, Limited scope project survey** – this is an intrusive survey limited by the scope of the project work to be undertaken. The survey methodology will be guided by work plans which show the extent of work in any area, the basic principle being that the minimum survey work and disruption will be undertaken in order to allow a project to go ahead. The method tends to be less invasive and damaging to the building than a full pre demolition survey, it takes less time with quicker turnaround of results and tends to be less costly whilst ensuring an adequate approach.

### 3.2 Priority Rating Scheme

All ACMs identified during management survey work should undergo an immediate risk assessment. This assessment should be undertaken at the time of survey by the appointed surveying organisation. The methodology used is taken from standard HSE guidance (HSG264 and HSG227) and is used to determine risk and assign priority. The scoring system used is demonstrated in the tables shown in figure 1. This table also forms the basis of ongoing risk assessment of materials and may be used by any individual to gather information on ACMs in order to feedback information to the AMT.

Figure 1: Asbestos Risk Assessment Methodology.

Stage One: Material Assessment			Stage Two: Priority Assessment			
Sample variable	Score	Examples of scores	Assessment factor	Score	Examples of score variables	
Product type (or debris from product)	1	Asbestos reinforced composites (plastics, resins, mastics, roofing felts, vinyl floor tiles, semi-rigid paints or decorative finishes, asbestos cement etc)	Normal occupant activity Main type of activity in area	0	Rare disturbance activity (eg little used store room)	
	2	Asbestos insulating board, mill boards, other low density insulation boards, asbestos textiles, gaskets, ropes and woven textiles, asbestos paper and felt		1	Low disturbance activities (eg office type activity)	
	3	Thermal insulation (eg pipe and boiler lagging), sprayed asbestos, loose asbestos, asbestos mattresses and packing		2	Periodic disturbance (eg industrial or vehicular activity which may contact ACMs)	
Extent of damage/deterioration	0	Good condition: no visible damage	Secondary activities for area	As above	High levels of disturbance, (eg fire door with asbestos insulating board sheet in constant use)	
	1	Low damage: a few scratches or surface marks; broken edges on boards, tiles etc	Likelihood of disturbance Location	0	As above	
	2	Medium damage: significant breakage of materials or several small areas where material has been damaged revealing loose asbestos fibres	1	Outdoors		
Surface treatment	3	High damage or delamination of materials, sprays and thermal insulation. Visible asbestos debris	2	Large rooms or well-ventilated areas		
	0	Composite materials containing asbestos: reinforced plastics, resins, vinyl tiles	3	Rooms up to 100 m <sup>2</sup>		
	1	Enclosed sprays and lagging, asbestos insulating board (with exposed face painted or encapsulated), asbestos cement sheets etc	Accessibility	0	Confined spaces	
Asbestos type	2	Unsealed asbestos insulating board, or encapsulated lagging and sprays	1	Usually inaccessible or unlikely to be disturbed		
	3	Unsealed laggings and sprays	2	Occasionally likely to be disturbed		
	1	Chrysotile	3	Easily disturbed		
Total score			Extent/amount	0	Routinely disturbed	
			0	Small amounts or items (eg strings, gaskets)		
			1	≤10 m <sup>2</sup> or ≤10 m pipe run.		
<b>Calculation:</b> Total Material Assessment Score + Average of each section (rounded-up) of Priority Assessment Score = Final Risk Assessment Score			Human exposure potential Number of occupants	2	>10 m <sup>2</sup> to ≤50 m <sup>2</sup> or >10 m to ≤50 m pipe run	
			0	None		
			1	1 to 3		
			Frequency of use of area	2	4 to 10	
			0	>10		
			1	Infrequent		
			Average time area is in use	2	Monthly	
			1	<1 hour		
			2	>1 to <3 hours		
			Maintenance activity Type of maintenance activity	3	Weekly	
				0	Daily	
				1	<1 hour	
			Frequency of maintenance activity	2	>3 to <6 hours	
				1	>6 hours	
				0	Minor disturbance (eg possibility of contact when gaining access)	
				1	Low disturbance (eg changing light bulbs in asbestos insulating board ceiling)	
				2	Medium disturbance (eg lifting one or two asbestos insulating board ceiling tiles to access a valve)	
				3	High levels of disturbance (eg removing a number of asbestos insulating board ceiling tiles to replace a valve or for recabling)	
				0	ACM unlikely to be disturbed for maintenance	
				1	≤1 per year	
				2	>1 per year	
				3	>1 per month	

The risk assessment methodology produces a single score which determines the relative risk associated with a particular ACM and dictates how the material should be managed. The score produced is banded in priority categories to aid in the management of the material. The priority bands are as follows:

Total Risk Score	Priority Category	Recommended Action
1 to 7	<b>1 (No Priority)</b>	Annual inspection, material will generally be safe in situ with no treatment required.
8 to 11	<b>2 (Low)</b>	Annual inspection, material will generally be safe in situ with no treatment required provided use of area does not change.
12 to 15	<b>3 (Medium)</b>	Minimum of annual inspection, material may require encapsulation or treatment.
16 to 20	<b>4 (High)</b>	Minimum of annual inspection, material requires encapsulation or removal to allow safe on-going use of area.
21 and over	<b>5 (Urgent)</b>	Material requires immediate attention, must be encapsulated or removed. Air monitoring should be undertaken.

### 3.3 Location of Registers / Hard Copy Surveys

The AMT administers the asbestos database at The Council House, Corporation Street, Derby. Hard copy reports are not held by the AMT but can be produced on request.

All sites surveyed have a hard copy report produced and issued to the Duty Holder of that site. The hard copy report should be on display where possible, failing this, it should be available to anyone entering the site. The long term intention is for the AMT to issue all documentation in electronic format to sites. It will then be the responsibility of the Duty Holder to ensure that copies of the information provided by the AMT is appended as instructed to the site red asbestos folder.

The Duty Holder for each site must ensure the following is undertaken: All persons entering a site to undertake activities which may disturb the fabric of the building must inspect the asbestos register to ensure that the agreed work will not disturb any identified asbestos materials. Additionally they must also sign the asbestos signing in sheet and agree to abide by the statement contained on the signing in sheet. If the information in the register does not provide sufficient information to the individual, advice should be sought for the AMT.

Sections 3.8 of this document detail more information relating to hard copy reports, where to find them and how to use them.

### 3.4 Electronic Registers

The AMT provides electronic registers for all surveyed properties. The Compliance Group Leader may authorise the distribution of these registers to any party with a valid requirement for the information.

The current single document file type used for distribution of asbestos registers is 'PDF'.

### **3.5 Updating Registers; Methods & Responsibilities**

An asbestos register is more than a single survey, it is an accumulation of data in any form and in any quantity, the asbestos register is a live document which must be kept up to date. This can only be done with the help and co-operation of all individuals who carry out asbestos surveys and removal work.

When an individual notices a change in an ACM or where project or maintenance work leads to a change in an ACM, the details must be noted. All related information should be collated, the existing asbestos register should be adjusted in distinct handwriting and a new risk assessment should be undertaken using section 3.2 of this document. The AMT can assist in this assessment. This should then all be posted to the AMT at the address given in section 2.2 of this document to enable database update and issue of a new register.

At any time, information copied to the AMT will be added to the database (and therefore register). The success of this update exercise does depend upon the format and clarity of the received data.

It is a joint responsibility of the Council and its Duty Holders including building managers and others to ensure data is kept up to date and accurate.

For further information relating to updating asbestos registers or if assistance is needed to carry out the update, the AMT should be contacted.

### **3.6 Monitoring and Re-inspections**

Information on re-inspection of asbestos is covered in appendix 7.5

The AMT aims to uphold the accuracy of the new asbestos registers by planning a rolling audit program in subsequent years. The AMT currently provide an annual asbestos re-inspection and management system audit service for all corporate buildings, where it is clear that Derby City Council holds full maintenance responsibility.

### **3.7 Labelling of Asbestos Containing Materials**

The Council does not routinely label the position of ACMs. The main reason behind this policy is the huge amount of upkeep required both centrally and by site managers to ensure labels are not moved, covered over or wrongly placed for comparatively little gain where an effective asbestos register is in place.

Although the location of asbestos materials is not routinely labelled, labels may be used where asbestos is covered over, or where asbestos has been repaired or more commonly in areas which have been sealed off due to the presence of asbestos in an unsafe condition. It is rare for this task to be carried out by anyone other than a licensed asbestos removal contractor or the AMT.

### **3.8 What does my asbestos register tell me and what doesn't it cover?**

Essentially, an asbestos register is the documented findings of an asbestos management survey (see section 3.1), which should identify the location and condition of all ACMs at room level and in easily accessible locations. Therefore, what you can see in any room will have been inspected and assessed for asbestos content (provided the register details that room as having been surveyed).

Unfortunately, management surveys do require an element of judgement from individual surveyors, as the definition of 'easily accessible' locations requires interpretation. The most common example of this is voids above suspended ceilings; areas which often need to be accessed for maintenance work. The guidance issued under this Management Plan is therefore, other than at simple, visible room level, you should assume all other areas have not been inspected unless the register states otherwise.

The most recent surveys commissioned by the AMT are more clearly defined with regard to extent of survey.

## **4 The Council's expectations of organisations working on their behalf**

### **4.1 Consultants & Professionals (not specialist in the field of asbestos)**

All external consultants and professionals appointed by the Council to undertake project work on their behalf must operate in accordance with the Asbestos Policy and this document, the 'Asbestos Management Plan'.

All external consultants and professionals should be aware of the roles and responsibilities of all parties working within a project as these organisations often hold principal responsibility for the management and running of a project and its contractors.

External consultants and professionals should acknowledge they are not competent accredited professionals in the field of asbestos and as such must seek advice and guidance when appropriate on matters relating to asbestos. This advice and guidance should be sought either from the AMT or a UKAS accredited asbestos consultancy, details of which can be obtained from the AMT.

As well as the on-site practicalities of dealing with asbestos, external consultants and professionals must be aware of the time, health and monetary cost implications of dealing with asbestos.

All external consultants and professionals must be aware of and have a developed working knowledge of the following basic principles:

- Prior to undertaking any work, all asbestos which may be disturbed during the work must be identified, removed or managed.
- Existing asbestos registers (available from the AMT) will give indicators to the amount of asbestos likely to be disturbed. These registers will not give conclusive information.
- It is highly likely that project work will require more intrusive (refurbishment/demolition) survey work to be undertaken in order to identify all asbestos which may be disturbed.
- The time taken to appoint a surveyor, carry out necessary survey work, undertake analysis and receive report may impact on project timescales, this should be planned for. It is rare for this entire process to be less than two weeks.
- Asbestos identified often requires removal which usually requires a specification to be drawn up for specialist contractors to price against. This again takes time, typically between one and two weeks.
- On appointment of a specialist contractor, a mandatory two week notification must be given to the HSE prior to commencement of licenced asbestos removal work.
- Specialist contractors must have their work either certified by or managed by an independent UKAS accredited analyst.
- All external consultants and professionals should be aware that on any project, asbestos should be actively managed as close as possible to the conception of the project, so as to not risk project overrun.

External consultants and professionals must ensure the individuals within their organisation are both appropriately trained on the basic principles of asbestos in the workplace and are made aware of points of contact for assistance. The AMT offers advice on training requirements for Consultants employed by the Council, Section 5 of this document details training on offer to Council staff.

#### **4.2 Analysts, surveyors and laboratories**

All analysts, surveyors and laboratories appointed by the Council (or subcontracted by a third party) to undertake work on behalf of the Council must operate in accordance with the Corporate Asbestos Policy and this document, the 'Asbestos Management Plan'.

Analysts, surveyors and laboratories must be aware of the specific working requirements of asbestos in the workplace (implied by accreditation) and should hold relevant insurance and accreditations as required by the CAR 2012 with which to conduct their duties.

The AMT accepts the general requirements of the CAR 2012 for appointment of specialist services but will in addition insist on specific relevant experience for those analysts, surveyors and laboratories working on Council properties.

Prior to undertaking work on behalf of the Council, all analytical, surveying and laboratory organisations must be reviewed and vetted for qualifications, accreditations and relevant experience by the AMT.

Analysts, surveyors and laboratories should seek advice and guidance on procedural, financial and organisational matters specific to the Council directly from the AMT in order to maintain consistency of approach.

#### **4.3 Specialist Contractors (licensed for work with asbestos)**

All specialist contractors appointed by the Council (or subcontracted by a third party) to undertake work on behalf of the Council must operate in accordance with the Asbestos Policy (Appendix 7.3) and the 'Asbestos Management Plan'.

Specialist contractors should either be a member of a recognised trade association or must be able to display a history of competency audits by an unaffiliated external body appropriately trained and qualified to carry out the task.

Unless otherwise stated in pre-contract documentation, all specialist contractors are appointed directly by the Council and as such their performance will be subject to the scrutiny of the AMT.

By undertaking work for the Council, the specialist contractor accepts at any time, subject to appropriate assessment by the Compliance Group Leader, a member of the AMT may enter a live asbestos removal site to assess competency and quality of work. The AMT undertakes an ongoing audit program of specialist contractors, looking at competency, quality, cleanliness, safety and behaviour.

In the absence of a representative from the HSE Construction Division or local Environmental Health office, the AMT reserve the right to invoke control over any live removal job being undertaken on Council properties (including the removal of operatives from site).

The AMT may appoint an independent laboratory on behalf of the Council to undertake a variety of roles ranging from audits to formal supervision, in which case the specialist contractor remains appointed directly by the Council but receives working instructions from the independent laboratory.

Specialist contractors are expected at all times to work in accordance with their company procedures and method statement / plan of work. The AMT may at any time ask for records of compliance to be presented.

#### **4.4 Unlicensed Contractors**

All contractors appointed by the Council (or subcontracted by a third party) to undertake work on behalf of the Council must operate in accordance with the Asbestos Policy and this document, the 'Asbestos Management Plan'.

Contractors who do not hold a license for asbestos removal must not undertake licensable asbestos work.

Prior to undertaking work for the Council all contractors must assess whether their works are liable to disturb asbestos containing materials. When contractors cannot categorically confirm their works will not disturb asbestos containing materials works must not commence until further investigation is undertaken or advice sought. This further investigation may involve requesting and evaluating existing information and / or commissioning project specific surveys.

Notifiable and Non licensed work must be undertaken by organisation who hold sufficient expertise along with the required notification systems, medical surveillance, training and record retention as required by CAR (2012).

Non licensed and Non notifiable work must not be undertaken by contractors unless the AMT, or an external laboratory approved by the AMT confirms the work methods proposed and level of staff training, company insurance and method statement are acceptable and compliant with all relevant asbestos and health and safety legislation.



## 5 Training and Awareness

### 5.1 What is asbestos? Common uses and health effects

#### What is asbestos?

Asbestos is a naturally occurring mineral and has been used for about 150 years on a large scale.

There are three main types of asbestos:

- crocidolite – ‘blue asbestos’;
- amosite – ‘brown asbestos’;
- chrysotile – ‘white asbestos’.

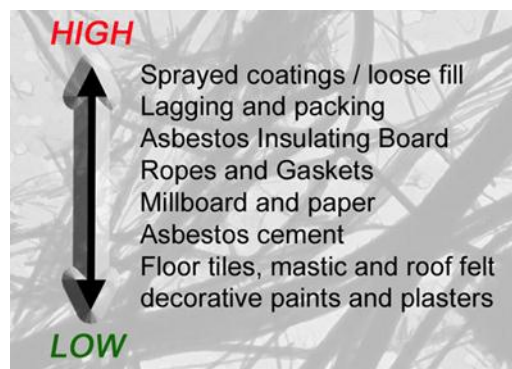
Also other less common forms such as fibrous actinolite, fibrous anthophyllite and fibrous tremolite have been used.

Although the main types are commonly known by their colours, this relates more to their raw state. In use, asbestos is usually mixed with other materials and will not show as blue, brown or white.

Asbestos fibres have been incorporated into numerous building materials, in various quantities and various states. The properties and versatility of asbestos made it an excellent building material. As a good thermal insulator it has been used to lag pipes and protect structural steelwork. It is also an excellent electrical insulating material and its high tensile strength has been used to give that strength to a wide range of other products such as gaskets, boards and rigid sheets. The long flexible fibres have been woven into cloth and rope used for fire protection and sealing of joints.

Add to all this the fact that it is highly resilient and does not degrade; it is not surprising that it was used so widely. However, unfortunately it can also be deadly! Large numbers of people are now dying from past exposure to airborne asbestos fibres and will continue to do so unless action is taken.

*Figure 2: Fibre release potential from different types of ACM*



The risk of contracting an asbestos-related disease depends on the length of exposure, the type of asbestos fibre and the amount that was breathed in. Blue and brown asbestos (the amphiboles) are significantly more hazardous than white asbestos, *however* white asbestos is also dangerous and is classified as a category 1 carcinogen.

### Why is asbestos harmful?

A very important message is that if asbestos is in good condition and is not likely to be disturbed it poses no risk to health and should be left in place and managed.

When asbestos is disturbed it can break down into sharp fibres and can be breathed in. The fibres then lodge deep in the lungs and do not dissolve; the blue and brown fibres are particularly persistent. This can lead to asbestos related diseases.

*Figure 3: Expected fibre release during poor working practices*

Typical exposures to asbestos fibres, where poor control measures and work practices have been used (fibres per millilitre of air (f/ml))	
Task	Typical exposure (f/ml)
Dry removal of sprayed (limpet) coating	up to 1000
Dry removal of lagging	up to 100
Drilling AIB	up to 10
Use of a jigsaw on AIB	up to 20
Hand sawing AIB	up to 10
Sweeping AIB debris	up to 100
Drilling AC	up to 1
Hand sawing AC	up to 1
Use of a circular saw on AC	up to 20

AIB: Asbestos Insulating board  
AC: Asbestos cement

\*note- AIB is Asbestos Insulating Board, AC is Asbestos Cement

Whilst no level of airborne asbestos exposure can be considered safe, the current legal limit (control limit) for exposure to asbestos fibres is 0.1f/ml.

There are three main asbestos-related diseases:

- **Asbestosis**, is a disease resulting in the lungs becoming stiff and scarred; causing shortness of breath. It is very disabling and can be fatal.
- **Lung cancer** is another distressing disease, which usually leads to death.
- **Mesothelioma** is a cancer of the lining around the lungs or the stomach. There is no cure, it is always fatal. It is mostly associated with exposure to blue and brown asbestos fibres.

Asbestos-related diseases have a long latency period. Diseases may develop anything from 15–60 years after exposure with the average being about 35 years.

Although there is no safe level of exposure to asbestos, it is clear that the more you breathe in, the more likely you are to develop one of the asbestos-related diseases.

Until recently it was thought that those dying from asbestos-related diseases were exposed to large amounts of asbestos fibres either regularly or during a continuous spell of work lasting from a few weeks to a few years. It is now recognised that repeated low level exposures, such as could occur during routine maintenance, can also lead to asbestos-related diseases. It is also acknowledged that smoking can multiply the risk.

*Figure 4: Asbestos and lung cancer, the relative effects*

(Lung cancer death rates per 100 000 person years)			
Asbestos worker	Smoker	Death rate	Mortality rate
No	No	11.3	1
Yes	No	58.4	X 5
No	Yes	122.8	X 11
Yes	Yes	601.6	X 53

### **Why is asbestos still a problem?**

We are dealing with the biggest occupational health problem ever encountered in the UK. Currently around 4000 people die annually from asbestos-related diseases; 1600 of those are deaths from mesothelioma. These deaths generally relate to exposure on average 35 years ago when poor controls were in place. Many of those now dying would have worked in the asbestos manufacturing industry or installing asbestos insulation in ships, railway carriages, industrial plant and buildings.

The annual number of deaths are expected to continue rising until approximately 2013, corresponding with the peak of asbestos use in the 1970s. However, no-one can be sure how quickly the numbers will diminish after this date, and it is now believed that without further action to reduce current exposure to asbestos, many more people will die.

Asbestos is no longer imported or used in products or construction but the use of brown and blue asbestos was not completely banned until 1985 and therefore it is common in buildings built or refurbished between the 1950s and the 1980s. White asbestos continued to be used until its ban in 1999.

Although much of this material has been removed over the years there are many thousands of tonnes of asbestos still present in buildings and in many cases, asbestos removal in previous years has not been thorough enough to remove the problem. It is estimated that about half a million non-domestic and four million domestic premises may currently have some form of asbestos in them; that's why it still presents a problem.

## **Which premises contain asbestos and where can it be found?**

Quite simply, any building built or refurbished prior to the year 2000 may contain asbestos. Due to the vast number of products asbestos was added to, it may be found anywhere within a building but is most likely to be found in an area where the properties of asbestos would be beneficial in its final point of use.

Specifically here within Derby, we have a vast array of buildings containing asbestos, ranging from system build buildings such as CLASP which often contain large amounts of asbestos within the fabric of the building to old, traditional buildings which more often contain asbestos around the heating system, service ducts and over-panelling.

Each Council managed site built prior to 2000 should hold an asbestos register from which you can obtain information on where asbestos is located in the building. For further information on survey work and asbestos registers, contact the AMT.

## **5.2 The Derby City Council training plan**

It has long been acknowledged that the degree of knowledge surrounding asbestos is variable from person to person and from trade to trade, in many circumstances, individuals across the Council have developed a good working knowledge of asbestos in the workplace. It is, however, common for individuals to know little about the implications of asbestos in the workplace, largely due to the specialist nature of the subject and the amount of related legislation.

The AMT & Corporate Health & Safety have developed a training plan to ensure any individual receive the relevant information for their everyday work. The plan takes in to account the nature of a person's job and the degree to which the person may be involved with managing asbestos.

The following levels of training are available via the AMT:

1. The Derby City Council site asbestos folder – a red folder situated at sites across Derby, housing the asbestos register, guidance documents, training materials and signing-in sheets. This is for the use of anyone managing or entering a particular site, especially those intending to disturb the fabric of the building. The AMT advise all staff permanently resident at a site to familiarise themselves with the content of the asbestos folder and find out where the asbestos is in their building.
2. Discussion based training with the AMT – phone or site based informal training with a representative of the AMT. This is primarily aimed at individuals interested in the specifics of the management of asbestos within the Council.
3. Formal classroom based training with an individual from Derby City Council Corporate Health and Safety – This training offers a certificate of training to attendees and the opportunity to ask questions of the trainer and also discuss amongst the group the implications of asbestos on your

work. This training is offered to any individual wishing to attend and is mandatory for Duty Holders.

4. Formal external examined training course – sourced via the AMT, this training requires the individual to be trained externally and be examined by the British Occupational Hygiene Society (BOHS) and will lead to a formal industry qualification (BOHS P405). This training is offered to individuals who have specific day to day dealings with asbestos within the course of their every day work and who may be required, from time to time, to offer advice to other individuals on asbestos matters or represent the AMT in a number of different scenarios.

The basic principle of the training plan is to allow all relevant people with responsibilities or who are employed by or carry out work for the Council, regardless of position or employer, access to the appropriate level of asbestos training. The AMT hopes that by taking this approach to training, more people will be aware of the dangers of asbestos, it is therefore more likely to be better managed and, therefore, ultimately our buildings are more likely to be as safe as they can possibly be.

By promoting this positive approach to safety culture, it is hoped the increased awareness of asbestos will lead to the increased awareness of other dangers in the workplace.

Information on training, materials, dates and bookings can be obtained by contacting the AMT or Corporate Health and Safety.

## **6 Work potentially involving asbestos – getting information to those who need it**

### **6.1 Emergency Procedures**

Where known or suspected asbestos is accidentally damaged or vandalised, the room or area in question should be evacuated immediately and sealed (where possible) and further access denied to non-authorized personnel. (Such persons permitted entry would be the emergency services acting under advice from the Asbestos Manager and or specialist maintenance personnel / contractor).

Notify Property Design and Maintenance helpdesk (640212) of the details and request assistance. If outside of working hours, this will be routed through to central control and will be dealt with by the Commercial Services on call supervisor.

Complete a formal accident report in accordance with current accident reporting policy.

The room/area must not be re-occupied until the individual in charge of the emergency confirms it is safe to do so – this is likely to be when a satisfactory clearance certificate has been issued by the analyst.

Review your control measures to establish why the event occurred and make changes to the measures aimed at preventing a recurrence. Notify the event to the HSE under the RIDDOR scheme if required.

If the asbestos emergency is the result of a secondary failure (e.g pipe burst) check the asbestos register first. If the emergency work requires access into areas beyond the normal scope of the asbestos management survey arrange to meet the Asbestos manager, a Health & Safety advisor or a specialist consultant on site to discuss how best to progress the work and what might be involved (Property Design and Maintenance or the consultant would need an order). The scope of a normal asbestos management survey would be to investigate all reasonably accessible areas, this should include all suspended ceilings and easily accessible roof hatches, floor ducts and wall voids. If in doubt, contact the Asbestos manager.

Agree a scope of work and method. One party or the other to write this down as a specification.

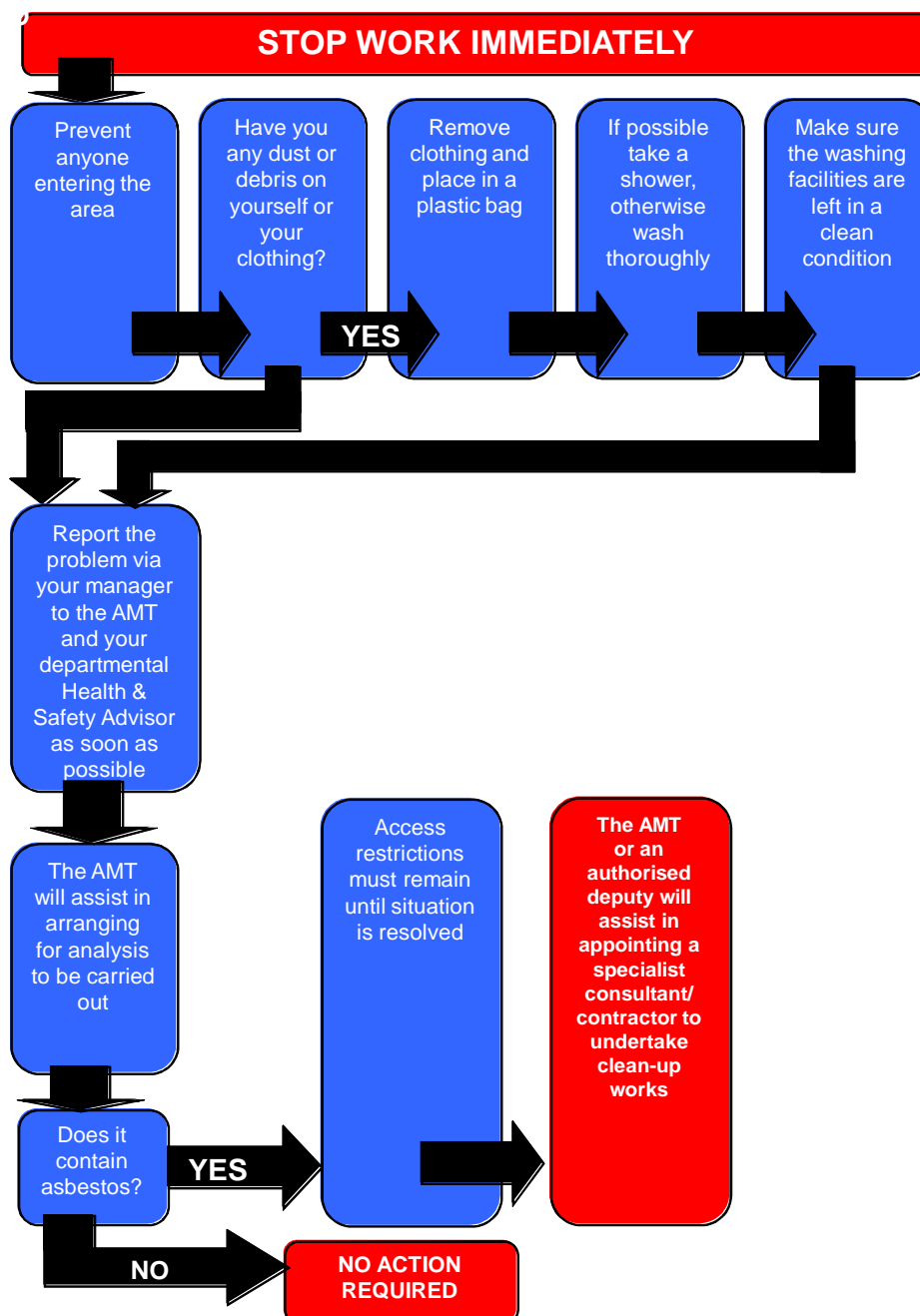
The Site Manager / Head Teacher or Compliance Group Leader (or the consultant if one has been engaged) shall arrange to meet an asbestos removal contractor on site and go through the specification and ensure the contractor understands fully the scope of works and the analyst's findings. The contractor and Site Manager / Head Teacher will then agree on a price for the work. In certain circumstances this may not be appropriate as an emergency may be on going. The Site Manager / Head Teacher should decide upon this under advice from his Health & Safety advisor and the Asbestos manager and appoint a contractor as necessary at short notice.

The contractor should then be provided with a written reason why a waiver must be sought from the HSE to carry out the work before the 14 day notification period has elapsed. The contractor will apply for the waiver.

When the asbestos removal work has been completed and clearance obtained the maintenance repair can go ahead.

Ensure that transit and disposal certificates (Section 62, Waste Consignment Note) are obtained and forward to the Compliance Group Leader to update and re-issue the necessary hard copy information.

Figure 5; what to do in the case of an uncontrolled disturbance of a suspect material (adjusted from HSE document 'Asbestos essentials')



## **6.2 The professional advisor – who they are and their responsibilities**

The professional advisor plays the most important role in any project as it is this person who ensures work is undertaken in compliance with all legislative requirements. The aim of which is to keep the work safe for everyone involved and to ensure give due account of the future implications of work undertaken.

The term 'professional advisor' is used because this person or organisation has the required attributes (training, qualifications, experience, insurance etc.) to offer advice at the level required by the work.

It is important to acknowledge that some projects may require more than one professional advisor, for example, a structural engineer is unlikely to be in a position to give competent professional advice on the details of an asbestos removal project, and vice versa.

## **6.3 Professional advisor and professional advice – what is the difference**

The most important concept for people embarking on project work with little specialist project training is to identify, during planning stage, where their skills are inadequate for the work which needs to be done, what professional advice needs to be sought, and who the professional advisors are going to be.

Many people are competent to offer professional advice, and may do so in the course of a conversation, but may only be deemed professional advisors when:

1. they are aware of their involvement in a project
2. they have been appointed to be responsible for, and ensure adequate completion of, a project or part of a project
3. agreement has been reached regarding the scope of work to which the professional advisor has responsibility

Within the field of asbestos, it is very important to understand this concept, as the consequences of planning or carrying out asbestos removal work inadequately can range from the financial cost of project delays to the long term cost to the health of individuals who continue to disturb an area that was thought to be previously cleared but was not actually, according to the removal contractor, within the scope of work for that project.

The AMT is made up of individuals competent to give professional advice relating to asbestos. In addition to this, UKAS (United Kingdom Accreditation Service) accredited external laboratories also, by the nature of their accreditation, have the relevant attributes to give professional advice, and fulfil the position of 'professional advisor' relating to asbestos.

For further advice relating to professional advice, please contact the AMT.

## **6.4 Management options for dealing with asbestos**

Once asbestos is identified or suspected in a building it must be managed. The management of asbestos containing materials includes the following requirements:



- Maintain the asbestos in a good state of repair
- Prevent uncontrolled disturbance of the asbestos
- Monitor the condition of the asbestos
- Ensure all persons liable to disturb the asbestos are made aware of its presence.

The on site responsibility to ensure the above requirements are complied with is the Duty Holder for each site. However, the AMT offer guidance and assistance in this matter.

The management of a single piece of asbestos, once it has been assessed, is essentially a very easy task. The basis of the management of asbestos is that unless disturbed or likely to release fibre, asbestos containing materials are safe in situ. With this in mind, an uninformed, incorrectly targeted removal policy can only lead to increased exposure to asbestos resulting from the unnecessary disturbance of the materials. Therefore, in agreement with HSE guidance, the AMT only approves of the removal of asbestos where there is a specific reason for its removal.

The removal of asbestos can be justified by reasons such as the asbestos needs to be removed for a project to go ahead, the asbestos is in a place where it is likely to be damaged or the asbestos is in such a condition that it is not financially viable to continually encapsulate it or the use of a room is to change which would elevate the risk of asbestos within that room.

The AMT generally assigns management options according to the risk assessment score given to the material at the time of survey, although certain scenarios call for an artificially increased or decreased risk.

The management options (related to priority scores, section 3.2 of this document and as seen on any Council asbestos register) are as follows:

1. **Leave the asbestos in place**, note its location, manage it and re-inspect the material on an annual basis. This management option is normally applied to ACMs producing a combined risk priority score of **1 to 11**.
2. **Encapsulate (seal) the asbestos**, repair where necessary, note its location, manage it and re-inspect the material at a minimum of an annual basis. This management option is normally applied to ACMs producing a combined risk priority score of **12 to 20**.
3. **Remove the asbestos**, the asbestos is in a condition or location which may require it to be removed. In certain circumstances, additional analytical work may be required to identify the extent of contamination. This management option is normally applied to ACMs producing a combined risk priority score in excess of **20**.

## **6.5 Risk assessment of Asbestos Containing Materials – when is it needed**

Risk assessment will be a familiar concept to anyone involved in any part of management in the workplace as it is the fundamental quantified measure of the safety of our workplaces.

The prominent legislative requirement for undertaking risk assessment is outlined within Regulation 3 of the Management of Health and Safety at Work Regulations 1999 (Management Regulations). This requirement is reiterated within Regulation 4 of the Control of Asbestos Regulations 2012.

Many forms of risk assessment may be undertaken in many different scenarios, but in each case, the general principle remains the same; you must assess the risk before you do any new work by carrying out the following steps:

1. Look for the hazards
2. Decide who might be harmed and how
3. Evaluate the risks and decide whether the existing precautions are adequate or whether more should be done
4. Record your findings
5. Review your assessment and revise if necessary

The management of asbestos is essentially no different from the above five steps, the risk posed by asbestos within any workplace (legally defined as non domestic premises) is assessed using the following 5 virtually identical steps:

1. survey the building for the presence of asbestos using a competent and insured individual.
2. apply the risk assessment methodology shown in section 3.2 for each identified material to decide if harm may be caused by the presence of that asbestos.
3. utilise surveyor judgement and the combined priority risk score to assess whether the material may be left in place or whether it needs to be encapsulated or removed.
4. record the findings of the inspection on an asbestos register for that property.
5. review the assessment prior to works being undertaken which may disturb the asbestos and undertake periodic re-inspections of the condition of the asbestos containing materials

The first point of risk assessment of asbestos within the Council is therefore carried out at the time of survey, but there is a need to carry out ongoing assessment of materials to maintain an accurate picture of their condition and associated risk over the coming years.

The AMT currently undertake a programme of central re-inspection for all of the sites where the maintenance responsibilities lie with Property Design and Maintenance. Additionally this service of central re-inspection is offered to all Council sites (through the maintenance package) where the maintenance responsibilities are held elsewhere.

## **6.6 Provision of information on the presence and condition of asbestos**

Any persons undertaking works on a building will potentially disturb the fabric of that building; hence they also have the potential to disturb asbestos in the building. These works may be as simple as painting a wall or putting up a notice board, or more complex projects, such as installation of new services.

Duty Holders must ensure the information on the presence / absence of asbestos in that building is communicated to the person involved in the works before they start work. The AMT has issued signing in sheets for persons undertaking work in buildings, these signing in sheet should be used to keep a record of these persons inspecting the asbestos register before they start work. Additionally anyone intending to undertake work on a building must be made aware of the limitations of the asbestos register. The existing registers will usually only identify readily accessible asbestos (see section 3.8 for further details). If the works are likely to involve disturbance beyond the surfaces of the building, for example drilling or access into wall cavities. Further investigation into the presence / absence of asbestos will be required before the works can commence.

Within project and maintenance work, additional risk assessments are required, such as the assessment of a specific task such as removing asbestos containing floor tiles or assessment of associated work such as working at height during an asbestos removal project. These are, however, specific to the individual project and should be taken in to account by an appointed professional advisor.

### **6.7 Minor works guidance – how to carry out everyday tasks**

This area is without doubt by far the most difficult concept to negotiate, and is responsible for by far the greatest number of calls to the AMT. The reason for this being, the time allocated to a task is much smaller than a big project, as is the financial commitment, but the legal requirements under the CAR 2012 do not change.

Unfortunately, even the smallest of tasks can cause significant release of asbestos in to the air. A task as small as putting up some shelves in an old CLASP system built building could lead to drilling through asbestos packing material or column cladding significantly contaminating the area and those in it.

The most important thing to establish is whether or not your work could disturb asbestos.

With this in mind, this section outlines a few very simple rules by which to keep yourself and those around you safe:

1. Is asbestos likely to be present?  
In any building built prior to the year 2000, you must assume the material you are going to disturb contains asbestos unless you have information proving otherwise.
2. Know where your asbestos register is and how to use it.  
Section 3.8 of this document explains what your register does and **does not** tell you.
3. Apply the information held in your register to the task you want to carry out. If your register cannot answer the questions you have asked, you may need to call upon professional advice.
4. Apply your own level of experience and training to the problem, you may be in a position to know that the material you are facing can only be a piece of wood, steel or brick. If in any doubt, always ask!

You may think you are right but there is no harm in checking (as brickwork in an old boiler house may have asbestos residues beneath the paint etc.)

5. Accept that sometimes you cannot proceed:  
If you cannot answer your questions, you will need to seek professional advice.

Further information on everyday tasks can be sought from the AMT.

### **6.8 Major works guidance – when is a job no longer ‘minor’?**

Quite simply, any job which requires entry in to or disturbance beyond the accessible aspects of the building is no longer a minor job as it requires the worker in every case to go beyond the scope of the management survey’.

In this case, professional advice must be sought and in most cases, further asbestos surveying work is required to allow the work to go ahead.

It is very important to factor this in to any project plans you may have which you may thought of as small at first, as the requirement to undertake additional survey work has an additional cost requirement in both money and time and will often highlight the requirement for asbestos removal in order for work to proceed, which itself comes with a significant cost.

As a general rule and guide, any work which could be classed as ‘major’ (or work which will involve access to voids or work on the structure such as cabling work) on a building built prior to the year 2000 should involve the consultation with a member of the AMT or an approved specialist consultant at the earliest possible opportunity during planning.

### **6.9 Who to appoint**

This section explains the capabilities of different individuals you may come across during the management of projects which may come in to contact with asbestos:

- **Non specialist consultants such as engineers and architects:** these organisations and individuals are often the first point of call for many projects as they are often the driving force behind refurbishments, building alterations, heating projects, electrical projects, installation projects and many more. Often, these consultants will specialise in an area of work but in almost all cases, are not specialists in the field of asbestos. However, these organisations should have a good working knowledge of the implications of asbestos on projects and as such should be very aware of when and where to appoint further specialist advice.
- **Building surveyors:** building surveyors work in a number of different areas and as such, their awareness of asbestos matters tends to be greater than other non-specialist professions due to the amount of time spent on site looking at live projects. Building surveyors do vary in the extent of training and knowledge on asbestos matters but will always

know when to appoint further specialist advice. Council building surveyors have an elevated knowledge of asbestos matters due to the levels of training and access to information given to them and many hold formal training qualifications in asbestos.

- **Non specialist contractors:** non specialist contractors range in ability on asbestos matters, larger contracting organisations with more developed health and safety policies are more likely to be aware of the implications of asbestos in their everyday business. These organisations also tend to have a high degree of knowledge gap between contract managers at the top level and labourers at the bottom level who in the majority of cases have no working knowledge of asbestos matters at all. It is this group of people, as defined by the HSE, that are currently the highest risk group
- **Specialist (licensed) asbestos removal contractors:** this group is heavily regulated by the HSE and as such tend to be technically competent to undertake any work within their normal remit. The quality of work received from this group is heavily dependant upon the organisation of each company. Companies range from small staff numbers drafting in agency operatives to larger companies with permanently employed staff. By far the most important two aspects in an asbestos removal company is the attitude of the Directors and contract managers to customer service and attendance at site meetings etc, and ultimately most importantly the competence and attitude of the nominated site supervisors responsible for undertaking the work. In the majority of cases, removal contractors should not be used for professional advice as they hold no license or accreditation to operate in this area and the insurance carried by removal contractors often does not cover the area of professional advice.
- **Specialist surveyors & analytical laboratories / consultancies:** This group can be subdivided into asbestos consultancies and surveying organisations;

#### Asbestos consultancies

To operate as a full service (asbestos consultancy, planning surveying, bulk and air monitoring) they should hold UKAS accreditation for these services). Organisations that hold such UKAS accreditation are generally happy to provide copies of their accreditation certificates upon request. Failing this the UKAS websites hold information of organisations currently holding accreditation. They should also have valid insurance to operate fully in the field. Full service consultancies are able to act in each capacity as professional advisor on asbestos projects.

#### Asbestos Surveying Organisations

There is currently no legal requirement for asbestos surveying organisations or individuals to be accredited for their surveys. To ensure quality standards are met the AMT recommend that only accredited organisations are employed to undertake asbestos surveys. Once more accredited organisations are generally happy to provide copies of their accreditation certificate(s) upon request.

Asbestos surveying organisations may not be competent to offer valid professional advice. Additionally the insurance carried by unattached individual surveyors is often not adequate for the purpose.

## **6.10 Safe removal procedures**

Asbestos removal is a heavily controlled industry. The accreditation, audit and insurance overheads of all parties within the industry are highly significant and it is for this reason that huge numbers of guidance, method and procedure documents exist detailing exactly what each licensed individual is required to do.

It is therefore not possible to reproduce this documentation within this document, nor would it be useful to those people wishing to know about the management of asbestos. What is most useful in this context is to simply state to managers what should be seen on site during any asbestos removal work.

If you come across asbestos removal on any site, you should observe the following (some of which may not be appropriate depending upon the nature of the work):

- the area of removal should be clearly defined from its surrounding area
- access to the work area should be prohibited to those not directly involved in the asbestos removal.
- the removal should be being carried out within an enclosure, normally indicated by polythene walls and cubicles.
- the enclosure should have an airlock attached, normally seen by three polythene cubes attached to the enclosure.
  
- the enclosure should appear to be expelling air out via at least one air handling unit known as a negative pressure unit (or NPU). This makes sure that any asbestos fibres released within the enclosure do not leak out of any gaps. If you can't see the NPU, look for the flaps of the airlock bowing inward, this will mean the NPU is located somewhere else where you can't see it.
  
- it is now preferable, and in some cases mandatory, for enclosures to be fitted with vision panels or CCTV to see in to the enclosure.
- the area surrounding the enclosure should be clean and the asbestos removal contractors should be clean shaven (to enable their respirators to fit properly) and respectful to their surroundings.
- as close to the enclosure as possible, you should notice a decontamination unit marked 'DIRTY' on one side and 'CLEAN' on the other.
- you may also notice an analyst on site, this is a separate party from the removal contractor, the role of the analyst can vary depending upon how the removal work is being carried out.
- an analyst in direct charge of the removal will be on site throughout the work whereas an analyst just appointed to certify the area suitable for reoccupation may only be present at the end of the job.

- all analysts will carry out air monitoring; you may notice this by the presence of air collection pumps and a laboratory area on site.

Please be aware that the above list is not exhaustive and whilst giving an indication of precautions associated with asbestos removal must not be used for audit purposes. Professional advice must always be sought for asbestos work.

The AMT operate on-going audits of all contractors that work under their direction but should you notice any points of concern or wish to discuss removal in more depth, contact the AMT.

## Appendix 7.1

### **GUIDANCE SHEET 1: INFORMATION FOR EMPLOYEES**

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#### **Introduction**

This document contains information and guidance on the management of asbestos in premises. This document is aimed at employees and contractors working in Council buildings. Further information and guidance is contained within the Council's Asbestos Management Plan, a copy of which is resident at each Council property.

#### **What is asbestos?**

Asbestos is a naturally occurring fibrous material and has been used for about 150 years on a large scale. It is versatile, plentiful and ideal as a fire-proofing and insulation material. But it can be deadly!

The three types of asbestos that have been used commercially are:

- Crocidolite (blue)
- Amosite (brown)
- Chrysotile (White)

All are dangerous, but blue and brown asbestos are known to be more dangerous than white. You will need a laboratory to properly identify the different types of asbestos.

#### **Why is asbestos dangerous?**

If you inhale asbestos fibres (which are long and thin) they can become lodged in the tissue of your chest and lungs, your body's natural defences may not be able to easily break them down. This can lead to lung diseases (mainly cancers), particularly if you are repeatedly exposed to fibres over a number of years.

Generally, asbestos is only a risk if you disturb or damage it and cause fibres to be released into the air. If asbestos containing materials are in good condition and in a position where they are not going to be disturbed or damaged then it is safer to leave them where they are and ensure the risks are managed.

#### **What are the likely health effects of exposure to asbestos?**

Exposure to asbestos can cause three main diseases:

- Asbestosis: irreversible scarring of the lungs
- Lung cancer: increased incidence, particularly if you smoke
- Mesothelioma: cancer of the lining of the lungs or stomach

All of these diseases have no cure – mesothelioma and lung cancer are fatal diseases. Typically, there can be a 15–60 years gap between first exposure and diagnosis.



## **Where is asbestos normally found?**

Asbestos was used in hundreds of different products and buildings, particularly from the 1950's to the mid 1980's. Asbestos cement was used up until 1999 in a variety of different premises and materials. Any building that was constructed or had major refurbishment between the 1950's and mid 80's is likely to contain some type of asbestos containing material. Use of asbestos peaked in the 60's and early 70's – premises built or refurbished during this time are the most likely to contain some form of asbestos.

## **Who is at risk?**

Anyone who disturbs or is in the vicinity of disturbance to damaged or deteriorated asbestos could be at risk. It is not always the case that illness is caused by long term persistent exposures to high levels of asbestos fibres; it is also the case that illness may arise from repeated low level exposures. Because of the way in which asbestos related diseases develop, isolated infrequent exposures to asbestos fibres may also pose a risk of illness.

## **How and why do exposures occur?**

Most commonly in today's workplace, exposures result from maintenance and project work to both those undertaking the work and people in the vicinity during and after the work. Any type of maintenance, construction or repair activity can result in exposure to asbestos if conducted wrongly. Other activities such as cleaning, decorating and movement of equipment may also cause exposure if asbestos containing materials are disturbed in the process.

## **What is an asbestos register and where can I obtain it?**

An asbestos register is a written summary of a survey carried out on your premises. The register will show where all visible asbestos is located within your building. It will not show where asbestos is located within hidden parts of the building.

Any Council site built before 2000 has an asbestos register issued to the Duty Holder for that building (usually the building manager, or in schools head teacher) who then has responsibility for keeping and making the register available to all who need it. You should identify who the Duty Holder is within your building and where they have placed the asbestos register. In some buildings, which are not always occupied, the person designated as Duty Holder may not be based at the building concerned.

## **Other than the asbestos register, do I have any other way of identifying asbestos?**

The Council does not operate a formal on site labelling policy due to inaccuracies and confusion caused when labels are moved, removed or covered over during refurbishment work.

Asbestos cannot be identified just by looking at it.

The final option available for identifying asbestos is either to appoint a specialist laboratory to survey and analyse samples or to use the Council's Property Design and Maintenance Asbestos Management Team to obtain the required information. This work should only be undertaken by or under specific instruction from your Duty Holder.

### **Can I work on an asbestos containing material?**

The simple answer to this question is no. The Council does not allow its employees or contractors to work on asbestos containing materials unless individuals have undergone specialist training, method statements produced and task specific risk assessments have been carried out, and a license is not required for the work.

### **What should I do in the event of potential release or exposure?**

If you find suspected or damaged asbestos or come across people working on materials which may contain asbestos, you should inform your building manager immediately.

Your building manager will have instructions on what to do in this type of event. The normal course of action will lead to the closure of the area awaiting tests should damaged asbestos be identified or uncontrolled work on asbestos be identified.

### **Who are my points of contact for further information?**

A number of contacts are available for your use; you should use them in the following order:

1. your building manager or professional adviser
2. your site safety representative
3. the Asbestos Management Team (AMT) 01332 640200 [asbestos@derby.gov.uk](mailto:asbestos@derby.gov.uk)
4. The Council House, Derby, DE1 2FS
5. external asbestos consultancies

Additionally general asbestos information is available from the HSE (Health and Safety Executive) on their website [www.hse.gov.uk](http://www.hse.gov.uk) or through their infoline 0845 3450055

### **What are the 3 most important things I can do as an individual?**

1. Make yourself aware of where asbestos may be and what you can do to help manage the risk posed by it. You can do this by reading this document and taking advantage of training materials your manager can make available to you
  2. Know how to obtain the asbestos register for your property and who you can contact for information
  3. Protect yourself and others by paying attention to work being carried out around you, any concerns you have being raised immediately with your building manager.
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## Appendix 7.2

### **GUIDANCE SHEET 2: INFORMATION FOR MANAGERS / DUTY HOLDERS**

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#### **Introduction**

This document contains information and guidance on the management of asbestos in premises. This document is aimed at managers who hold the “Duty Holder” role for the management of asbestos within Council buildings. Further information and guidance is contained within the Council’s Asbestos Management Plan.

This document complements guidance sheet 1; ‘Information for Employees’ which provides basic information about what individuals in Derby need to know about asbestos in their buildings.

It is your responsibility to ensure all asbestos related issues on your site are managed in accordance with this document and the Council’s Asbestos Management Plan.

#### **Who can I contact for more information?**

A number of contacts are available for your use; you should use them in the following order:

1. Property maintenance and energy’s asbestos management team (AMT). This team operates under the instruction of the Compliance Group Leader.
  - Tel: 01332 640200
  - [asbestos@derby.gov.uk](mailto:asbestos@derby.gov.uk)
  - Derby City Council, The Council House, Derby, DE1 2FS
2. An external asbestos consultancy
3. Your site safety representative (providing the individual has specialist knowledge relating to the management of asbestos)

Additionally general asbestos information is available from the HSE (Health and Safety Executive) on their website [www.hse.gov.uk](http://www.hse.gov.uk) or through their infoline 0845 3450055

#### **How can I ensure my information is up to date and current?**

The AMT will endeavour to provide all Duty Holders with the latest guidance, training materials and contacts available. On-going programs of surveys, re-inspections and audits are offered by the AMT via Property Design and Maintenance.

It is good practice to carry out quarterly inspections of the condition of known asbestos containing materials on your site. You can use a copy of your existing asbestos register and note any changes to each material. Any significant changes or materials requiring urgent attention should be immediately reported to the AMT.

Most importantly, unless work is being carried out on your behalf via the AMT, you should inform the AMT in writing or copy information to the AMT for any work you have done on your building which involves the removal or disturbance of asbestos containing materials.

The AMT will organise on your behalf for an asbestos re-inspection to be carried out on an annual basis for sites where the maintenance budget is held by property services. This service will be extended to school buying into the maintenance package.

**I am not a specialist in asbestos management and feel I am not in a position to take in to account all of the reference material, guidance documents and legislation, where should I look?**

The two most important documents available to you are the 'Derby City Council Asbestos Management Plan' and your asbestos register. By following the guidance contained in the management plan, you will be in a position to keep yourself and those around you safe from exposure to asbestos, the fundamental goal of all current regulations.

Any further specific information required relating to regulatory requirements or any queries you have can be discussed with the AMT.

The 'Derby City Council Asbestos Management Plan' encompasses all of the relevant information previously issued to you or your predecessors and will be the document used to issue future guidance in the form of further guidance sheets.

**What training is available to me?**

The Corporate Health and Safety run an on-going training program for the designated Duty Holder, contact Tony Youens 01332 642393.

**What should I do in the event of potential asbestos release or exposure?**

Section 6.1 of the 'Derby City Council Asbestos Management Plan' gives you simple instructions of what to do in an emergency, as a general rule should you not have the document to hand, close and seal the area as far as possible without putting yourself or others in the way of harm, remove contaminated clothing and wash if possible, remove nothing from the area and contact the AMT immediately.

**I am a building manager and therefore need to organise work on a regular basis, what do I need to know?**

Section 6 of the 'Derby City Council Asbestos Management Plan' gives guidance on how to carry out work safely in your building. It is vitally important work is undertaken correctly as the majority of current asbestos exposures are related to maintenance or project work undertaken incorrectly.

Following section 6 will ensure you, the Duty Holder, have the necessary information to hand with which to arrange work. You should be aware as a person responsible for undertaking work that the design or planning stage of any project is by far the most important in ensuring a job is carried out safely.

The AMT recognises your requirement for undertaking regular, minor work and can offer advice and guidance beyond the 'Derby City Council Asbestos Management Plan' should it be required. The AMT also recognises that removal or alteration works involving asbestos can be highly complex and often subject to many regulatory controls and therefore advises that such work should be organised either by the AMT or an appropriately trained and qualified individual.

Take some time to read through the following checklist, should you have any queries relating to this, please address them to the AMT

### **Manager's checklist**

- Have you read and understood the content of the 'information for employees' guidance sheet?
  - Do you understand your responsibilities regarding management of asbestos within your building?
  - Is a copy of your asbestos register and Derby City Council Asbestos Management Plan present on your site and under your control?
  - Do you understand where asbestos could be found in your building and who may be at risk?
  - Have you received training in asbestos awareness and the management of asbestos?
  - Have employees on your site been made aware of the content and location of your asbestos register and the Derby City Council Asbestos Management Plan. Do you have a procedure in place ensuring all visiting contractors are given information about asbestos in your building and sign to state they have seen the information?
  - Do you have a procedure in place to ensure that annual re-inspection and folder review is carried out by a competent individual?
  - Are you aware of the procedures you should put in place in case of an accidental release or exposure to asbestos?
  - Do you have the necessary information to hand to allow you to plan and undertake work in your building safely?
  - Do you know whom to contact for more information?
-

## Appendix 7.3

### Corporate Asbestos Policy

#### Demonstrating commitment

Derby City Council will, in accordance with its duties under current regulations, protect everyone on its properties from exposure to asbestos so far as is reasonably practicable. This policy includes protection of Council employees in properties leased by the Council but currently does not cover Derby Homes properties, Academies, Foundation or Voluntary Aided Schools. To do this, we will take reasonable steps to make sure:

- all properties affected by the policy statement are surveyed to the Management Survey standard, as defined in the Health and Safety Executive publication HSG264. All reasonably accessible areas will be included in the surveys. The survey will identify all asbestos containing materials (ACMs), including their asbestos type, content and risk severity. The location of all identified ACMs will be marked on line plans of the building.
- all asbestos data is held on an accurate and up-to-date site referenced database accessible to all who need it.
- until such time as the database is web accessible, hard copy registers will be sent to each site manager. Contractors will also be provided with necessary asbestos data as and when working on the Council's buildings.
- any changes in the condition of ACMs that are reported to the Asbestos Manager are investigated, the risk assessment updated and appropriate action taken
- risk assessment and prioritisation methods, which are set out in appendix 7.4 "*Corporate Asbestos Policy - Guidance*", are used to identify where ACMs are to be removed or managed. All ACMs defined as "urgent" will be subject to remedial work as soon as possible.
- asbestos is given equal priority within the core management activity of health and safety.
- competent individuals are employed within the workforce to give guidance, instruction and assistance on asbestos issues and where necessary source specialist advice.
- employees, designers and tradesmen will be assisted in receiving the appropriate instruction required to avoid the threat posed by asbestos.

#### Supporting continuous improvement

In line with the Corporate Health and Safety Policy, the Council believes that continuous improvement in asbestos safety is a shared objective for everyone to work towards. To achieve this, we will:

- develop and implement an effective asbestos management system based upon risk assessment as required by current asbestos regulations.

- regularly re-inspect positively identified ACMs and update the database of changes. Re-inspection frequency will be determined by the risk assessment score but will meet statutory minimum requirements.
- systematically review and refine our policies, procedures and guidance documents.
- ensure adequate resources are made available for dealing with the management of asbestos.
- Transfer of information (where possible) from refurbishment and demolition surveys to asbestos management survey.

### **Promoting employee participation**

The Council supports the participation of employees and contractors in asbestos matters and will promote open, constructive consultation with employees and their nominated representatives. We recognise that active involvement helps to:

- spread the knowledge of site specific asbestos issues allowing the provision of the most accurate and up-to-date database information possible.
- reduce asbestos at work related ill health, working toward the Health and Safety Executive's core aim of reversing the current trend of asbestos disease.
- promote a positive health and safety culture.

### **Responsibilities**

Current asbestos legislation allocates responsibility for properties according to the concept of the 'Duty to Manage' premises (Regulation 4 of the Control of Asbestos Regulations (CAR), 2012). Current regulations state that the duty to manage a property is held by the owner / employer of that property. It is important to note that the law states that duty cannot be delegated (yet an individual may delegate management responsibility for that duty). Therefore, the dutyholder for the majority of council buildings (excluding Foundation and Voluntary Aided Schools) will be shared between the Council via the Cabinet, and the individual who has the budget for maintenance.

The day to day Duty to manage will rest with the **Site Managers and/or Head Teachers** (whoever holds the budget for maintenance of the building) and is enforceable within section 4.2 of the current CAR 2012 regulations; "Every person shall cooperate with the dutyholder so far as is necessary to enable the dutyholder to comply with his duties under this regulation"

### **The Council**

In line with the Corporate Health and Safety Policy, the Council, through its Cabinet, has shared responsibility for health, safety and welfare with regard to asbestos (through leadership, provision of adequate resources and overseeing performance) of:

- all employees, and
- users and visitors who could be affected by Council work activities

### **The Chief Executive**

Through the Chief Officer's Group, the Chief Executive is responsible for making sure:

- effective structures are in place to manage asbestos.
- an effective asbestos policy is developed as part of the overall health and safety policy and implemented consistently across the Council.
- positive action is taken to improve performance with regard to asbestos where problems are identified.

### **Chief Officers**

Each Chief Officer is responsible for the management of asbestos issues within their department. This includes:

- making adequate resources available departmentally for managing asbestos.
- making sure departmental policies are created, reviewed and publicised.
- periodic consultation with employees and safety representatives to improve awareness and seek suggestions for continuous improvement.

### **Managers, Site Managers and Head Teachers**

The Council believes, as part of the overall health and safety policy, responsibility for asbestos is a basic management function. All site managers and head teachers are responsible for:

- making sure that anyone who may come into contact with asbestos, including voluntary workers, caretakers and parents are made aware of the location of ACMs on the property.
- implementing signing in procedures which will seek to ensure that the asbestos register is inspected by visitors / trades people who may come into contact with asbestos during their visit.
- implementing and communicating the asbestos policy and management plan
- communicating their personal commitment to asbestos management by setting a good example.
- ensuring risk assessments and surveys are carried out for the work activities they control or commission ensuring due attention is given to the threats posed by asbestos on any particular site.
- making sure all asbestos related accidents, incidents and ill health are reported, investigated and any necessary remedial action taken.
- making sure staff are aware of the presence of asbestos in their workplace and how to deal with asbestos.

### **Health and Safety Advisors**

The Council's health and safety advisors are responsible, within the overall scope of the health and safety policy, for:

- providing an effective advisory service to all employees.
- acting as a point of contact for employees and contractors with regard distribution of asbestos training and supporting literature.



## Employees

All employees will be advised of their role and responsibilities regarding asbestos, what it means to them and how they can help with its management. Every employee has a responsibility for asbestos issues, including:

- taking care of their own health and safety with regard to asbestos.
- making sure others are not put at risk by their actions or inactions.
- informing their manager, the Asbestos Manager or departmental health and safety advisor immediately about any concerns or change in condition to asbestos or suspect materials.
- following the Asbestos Policy and management plan to assist with management and the implementation of the Policy.
- reporting shortcomings or problems regarding the provision of relevant asbestos information and conduct of contractors on site.

## Project Planners (may be any of the above individuals)

Project Planners hold the key to successful asbestos management. Planners must ensure all asbestos issues are dealt with prior to beginning any project, as required under Construction (Design and Management) Regulations 2007. Project Planners have responsibilities to:

- ensure projects which need to disturb ACMs identify this within the project plan. The asbestos must then be removed within the timescales and funding of the project.
- carry out more detailed survey work as necessary, where intrusive work is planned at any property. This is generally known as a refurbishment/demolition survey – as defined by the Health and Safety Executive publication HSG264. See "*Corporate Asbestos Policy - Guidance*" and the Asbestos management plan for further information on the requirements of refurbishment/demolition surveys.
- employ as necessary a laboratory for co-ordinating and arranging removal and remediation work where there is insufficient in house expertise, resources or knowledge. A list of organisations who have been successfully procured to carry out projects for the Council can be found in the latest "*Corporate Asbestos Policy - Guidance*" for this Policy.

The Corporate Asbestos Policy supports and promotes the visions, key themes and values of Derby City Council

## Appendix 7.4 - Regular monitoring of known accessible asbestos

Asbestos and 'Asbestos Containing Materials' (ACMs) can be hazardous to health if damaged or disturbed, it is therefore important to make sure that such materials are not damaged or inadvertently disturbed.

A range of management systems are in place to reduce the likelihood of known asbestos becoming inadvertently disturbed e.g.

- Damage reporting procedures
- Signing in procedures to make sure only authorised persons are allowed on site
- Checking and signing the asbestos register before starting work
- Annual asbestos re-inspection by competent person (includes review, update and re-issue of management survey and plans, audit of site red folder and update of any documentation as required. Monitoring of signing in procedures for effectiveness)  
Where refurbishment surveys have been carried out the information will (where possible) be transferred to the management survey.

### How to Monitor Asbestos

- Take your existing site asbestos register with you as you walk around the site
- Systematically work through each accessible identified or presumed asbestos item in your register
- Visually inspect and record each item to see whether it has or has not been removed, damaged or deteriorated, using the following categories:

Extent of Damage	Description	Action Required
No Visible Damage		Record & date in Register
Damaged	<ul style="list-style-type: none"><li>• A few scratches</li><li>• Significant clean breakage</li><li>• <u>No</u> visible dust</li></ul>	<ul style="list-style-type: none"><li>• Monitor</li><li>• Phone for advice (help desk)</li><li>• Order repairs (if required)</li><li>• Record actions in Register</li></ul>
High Damage	Visible dust and debris	Evacuate and phone (help desk)

### It is essential that you initiate action on all deterioration/damage identified

Write your name, date, findings/advice and action taken next to the photograph in the register.

**If you note High Damage to any asbestos product in an occupied area, or are concerned by what you find; Immediately and calmly clear the occupants from the area and **contact the Maintenance Helpdesk for 'Urgent Asbestos Assistance' on 01332 640212.****

**In the event of any amendments send a paper copy of the information gathered to:**

**Asbestos Management Team, The Council House, Derby, DE1 2FS**

## Monitoring Frequency

1. **Daily:** It is important for all staff to report damage/deterioration to any of our properties as soon as is practicable. Any damage should be reported promptly via your internal damage reporting procedure – Don't wait for a Re-Inspection.
2. **Quarterly:** Formal checks need to be undertaken of areas of accessible known asbestos. Looking for damage and deterioration.

## Difficult to access areas

There may be some asbestos present in service areas that are not normally accessed, in these areas access is restricted due to the presence of asbestos and should not be accessed for monitoring purposes.

For these areas you need to check that they remain separated/segreated from occupied areas:

e.g.

- **Ceiling voids** – check ceiling tiles are in place and not damaged
- **Lofts** – check loft hatch is in place and secured (if applicable)
- **Floor tiles beneath carpets** – check carpet is in place

Difficult to access areas may have to be accessed periodically by maintenance personnel. It is therefore essential that you know when maintenance personnel are in your building, and that they have:

- Signed in (if applicable), and
- Checked the 'Asbestos Register' and signed the signing in sheets within the red asbestos file to state they've done so.

It is the responsibility of the maintenance personnel to make sure their works will not cause damage / deterioration to any asbestos containing materials in these areas or contamination of surrounding areas.

## Monitoring of Known Accessible Asbestos Flow Chart

