



# Asbestos Management Policy

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### Statement of intent

Highfields Primary understands that any asbestos found in our buildings must be managed properly, because the health and wellbeing of our pupils, staff and visitors is of the utmost importance. This policy abides by the law stated in the Control of Asbestos Regulations 2012.

If there is an incident of asbestos exposure, the school will take the necessary steps to ensure that everyone is safe and, unless the incident is minor, we will report it to the HSE.

To ensure the health and safety of those in our school, we take the following steps:

- Have a 'management survey' of asbestos-containing materials (ACMs)
- Assess the risks associated with ACMs
- Devise a plan for managing asbestos
- Make sure staff and visitors know the risks and the precautions they need to take
- Keep the management of asbestos under review

## 1. Legal framework

This policy has due regard to legislation and guidance including, but not limited to, the following:

- Control of Asbestos Regulations 2012
- Health and Safety Work Act 1974
- The Hazardous Waste (England and Wales) Regulations 2005
- The Control of Substances Hazardous to Health Regulations 2002
- Environmental Protection Act 1990
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013
- Safety Representatives and Safety Committees Regulations 1977
- Health and Safety (Consultation with Employees) Regulations 1996
- Construction (Design and Management) Regulations 2015
- The Management of Health and Safety at Work Regulations 1992
- DfE (2020) 'Managing asbestos in your school or college'

This policy operates in conjunction with the following school policies:

- Asbestos Management Plan
- Health and Safety Policy

## 2. Roles and responsibilities

For the purposes of this policy, the headteacher is the person responsible for the overall upkeep of the school. The headteacher is responsible for:

- The maintenance and repair of the school and safe management of asbestos.
- Consulting with employees on matters that affect their health and safety.
- Appointing a person within the school who is responsible for ensuring that asbestos materials are properly managed, at Highfields this is the Site manager.

All staff have a responsibility to play their part in the safe management of asbestos.

The school is not legally required to inform parents about the presence of asbestos in the school; however, should parents request such information, the school will be responsive to this.

If management arrangements at the school fail to prevent the disturbance of asbestos containing materials, and there is an accidental release of asbestos fibres, those affected will be informed.

## 3. Daily management of asbestos

### Step 1: Conducting a management survey of asbestos-containing materials (ACMs)

The school will carry out an asbestos management survey which records the location and condition of the asbestos in all school buildings constructed before 2000. The survey will be conducted in accordance with HSE

guidance, and will be undertaken by a United Kingdom Accreditation Service (UKAS) accredited surveying organisation. The survey will cover all accessible places, including above the ceilings and floor ducting.

The management survey will identify what type of ACMs are present and where they are. All areas of the school premises will be included, such as storerooms, yards, outbuildings, underfloor services, pipes, ceiling voids and corridors. The survey will consider the condition of the ACMs, whether they are likely to be disturbed and the action that is necessary to manage the risks.

Following the survey, a plan will be developed which brings together all the available and relevant information. It will set out what is going to be done, when it is going to be done, and how it is going to be done, both for any remedial work and for ongoing management action, e.g. periodic checks.

### Step 2: Assessing the risks associated with ACMs

Once the management survey has been completed, the school will work with the asbestos surveyor to assess the risks associated with each occurrence of asbestos. The assessment will include three parts:

- **'Material' assessment** – this is provided within the survey and is an assessment of each item of asbestos material identified based upon the type of material, the type of asbestos it contains, its surface treatment and the extent of damage.
- **'Priority' assessment** – this is the assessment of the likelihood of someone disturbing the material based upon factors such as the number and type (e.g. pupils) of people using the room, the time they spend in the room, the location, the accessibility and extent of the asbestos, and the frequency and type of activity that might disturb it.
- **'Total' assessment** – the 'material' and 'priority' assessments will be combined to give a total risk assessment.

### Step 3: Devising a plan for managing ACMs

The school will create an Asbestos Management Plan, which will include the following information:

- The leadership statement on ownership of the risk and training arrangements for staff, including clear roles of specific individuals, the type of training undertaken and by whom, and the dates training was undertaken
- Plans for any necessary work identified from the risk assessment, both for any remedial work and for ongoing management actions
- The asbestos register, which brings together all the available and relevant information, including pictures
- Ongoing arrangements to monitor and record the condition of ACMs
- Arrangements for actively managing the potential risk from presumed or 'hidden' asbestos
- Procedures for controlling routine maintenance work undertaken at the school
- Arrangements for the management of any construction or maintenance work – this should identify the checks to ensure that the correct controls and that competent HSE-licenced contractors are used
- Emergency procedures to be actioned in the event of inadvertent disturbance of ACMs both within and outside the normal opening hours

- Communication arrangements for sharing the plan with staff and visitors (anyone who is liable to disturb asbestos materials as identified through a risk assessment)
- The reporting and escalation procedures where any damaged asbestos is noted
- Governance arrangements, including:
  - Nomination of those who can make entries or amendments to the plan
  - The formal arrangements for reviewing and updating the plan
  - The location of all asbestos-related documentation, as well as back-up and business continuity arrangements

The school will ensure its management arrangements are effective during school closure periods, such as after school hours and during community use when school staff presence is minimal.

The Asbestos Management Plan is a live document and will be reviewed and updated when necessary.

#### **Step 4: Ensuring staff and visitors know the risks and precautions that need to be taken**

The school will inform staff, volunteers and other stakeholders of all locations of ACMs and how they could be damaged and disturbed. The school will ensure that all these people receive the correct information, instructions and training, and will be clear in what precautions to take.

The school has plans in place to ensure that if emergency services request information about the asbestos that is present in the school, information will be provided to help keep emergency service workers safe.

#### **Step 5: Keeping the management of ACMs under review**

The school will update its Asbestos Management Plan and asbestos register as circumstances change, or review them at least annually. Following reviews, the school will address any identified changes or areas for improvements and communicate any changes to all staff.

The Asbestos Management Plan will also be updated if:

- There are changes in the identified responsible people or organisations.
- New information is received, e.g. from 'refurbishment and demolition' surveys.
- Work is undertaken on ACMs.
- Damage to asbestos areas occurs.
- ACMs are removed.
- Significant building works are undertaken which might confuse the documented location of ACMs.

#### **4. Asbestos register**

The asbestos register is formed by the combination of the asbestos location register and the asbestos risk assessment to offer an overall picture. The register will include:

- Drawings and photographs, where relevant.
- The location, accessibility, extent and condition of the ACMs.
- The forms and material types of ACMs.

- What the ACMs look like.
- The associated risk assessment of ACMs.
- A clear indication of parts of the building where the presence of ACMs is presumed.
- Any areas which were not captured within the management survey and where the presence of asbestos cannot be ruled out – these areas will undergo a further survey ahead of access.

The school will update the asbestos register at least twice annually to reflect the current status of the ACMs within the buildings. Where further asbestos materials have been identified or removed during refurbishment work, this will be recorded.

The asbestos register will be reviewed annually and any changes will be communicated to all relevant staff.

## **5. Building and maintenance work**

The school's management survey only covers readily accessible areas; therefore, it may not have covered all ACMs that are present. If concerns arise that building and maintenance work may disturb hidden ACMs, the school will arrange for a 'refurbishment and demolition' survey to be carried out in the area where the work is set to take place. Due to the intrusive nature of this survey, it will be carried out under controlled conditions. These surveys will be passed on to those who will eventually take on the work.

Small, short duration tasks may be carried out by non-licensed workers, provided that they have the appropriate information, instruction and training, and the correct measures are taken. Higher risk work, such as the removal of asbestos, will be completed by a contractor licensed by the HSE. The school may need to notify the HSE of some types of non-licensed work.

Once work is appropriately authorised, contractors will be prepared for the unexpected presence of asbestos materials. If further asbestos materials or suspect materials are uncovered, the work will stop, the area made safe, and the work reassessed before continuing.

Asbestos-containing waste will be properly contained and disposed of in accordance with the Hazardous Waste Regulations 2005, and the school's Health and Safety Policy. Where the work has been contracted out, disposal is the responsibility of the contractor, although the school will have responsibility for obtaining a waste consignment note to confirm that the asbestos was appropriately disposed of.

The school will ensure that all staff and other stakeholders are informed of the proposed works. Trade union health and safety representatives will be consulted in a timely manner on matters relating to the planned work.

## **6. Asbestos-related incidents**

If the school finds that there has been, or may have been, an unplanned disturbance of asbestos, the following action will be taken:

- All activities will stop and everyone will be evacuated from the affected area
- Staff, pupils and visitors will not be allowed to re-enter the affected areas until any necessary remedial action has been taken
- Items, including equipment, books, or personal belongings, will not be moved from the area

- Staff, pupils, parents and visitors will be given relevant information to understand the risks and advised to consult their doctor
- Advice will be sought from an asbestos expert regarding remedial action
- Unless the incident is minor, the school will notify the HSE, as this is a legal requirement under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013
- Contractors should have procedures in place to deal with the unintended or unexpected release of asbestos
- Anyone who has come into contact with asbestos, and is concerned about their exposure, will be advised to contact their GP

The school's Asbestos Management Plan will detail the procedures for staff to follow in the event of an incident, and this will be communicated to all staff.

## **7. Monitoring and review**

This policy will be reviewed annually by the duty holder. Any changes to this policy will be communicated to all members of staff, visitors and stakeholders. The next review date for this policy is September 2024.