



**Extend Learning**  
Academies Network

# Asbestos Management Policy

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## 1. Statement of Intent

At Extend Learning Academies Network (ELAN) we understand the importance of protecting the Health and Safety of all our employees and pupils, parents, and members of the Public.

The Asbestos Management Policy details how ELAN meets the requirements of the Control of Asbestos Regulations (CAR) 2012. In addition to this, the policy provides assurance to occupants those measures are in place to ensure compliance with the regulations and to identify, manage and/or mitigate risks associated with Asbestos Containing Materials (ACM's).

The policy is relevant to all ELAN employees, contractors and other persons who may work on, occupy, visit, or use its premises, or who may be affected by its activities or services. It should be used by all to ensure they understand the obligations placed upon ELAN to maintain a safe environment for occupants and employees within all non-domestic premises or areas of buildings.

ELAN will follow a systematic approach to the management of Asbestos to ensure it meets the requirements set out in the CAR 2012 and other relevant legislation relating to Hazardous Substances. This is to ensure the safety of occupants, employees, and members of the public.

## 2. Policy Statement

The ELAN Trust recognises its duty to comply with the CAR 2012 and other relevant legislation and guidance. It is our objective to ensure that Asbestos Containing Materials are managed effectively, and employees understand their duty to contribute to the robust management of such materials. The key objectives of this policy are to establish:

- Asbestos Management Principles
- Inspection Testing Regime
- Record Keeping
- Competent Person
- Training

Note: ELAN will only remove Asbestos Containing Materials where the risk of fibre release is identified as High and cannot be safely managed. Additionally, the ELAN will endeavour to remove ACMs in conjunction with any relevant building work in the vicinity if practical. There is no requirement to remove in situ Asbestos where it is safely managed, and this approach is supported by The Health and Safety Executive.

## 3. What is asbestos, and why do we need to manage it?

Asbestos is a term used for various forms of naturally occurring fibrous silicate minerals, which were extensively imported and added to building materials used in the UK from the 1950's up until its ban in 1999. Any building built before 2000 has the potential to contain asbestos.

When asbestos fibres are inhaled, they can cause serious diseases and the increased risk of lung cancer for asbestos workers who smoke. A key part of this policy, and the schools associated management plans, is to ensure that works are managed as to prevent any exposure to our staff and building occupants.

Due to the archetype of many system-built schools, we must always take a cautious and proactive approach to the management of asbestos and should always assume a product to contain asbestos until we have had assurances that it is safe to disturb.

All asbestos containing materials (ACM's) should be controlled regardless of type. ACM's can be found in under floor services, floor, ceiling tiles, pipe covering, textured coated ceiling, heat deflection materials and in many other forms.

## 4. Our Legal Duty

To ensure that risks from asbestos in places of work are managed, the Control of Asbestos Regulations 2012 places responsibility on those duty holders for the maintenance or repair of work premises. For the purpose of this policy, ELAN are the duty holder, and will work with schools to ensure that key tasks are appropriately delegated.

The Control of Asbestos Regulations 2012 requires the person who has the duty (i.e., the 'Duty Holder') to:

- take reasonable steps to discover if there are materials containing asbestos in non-domestic premises and if so, to determine its amount, where it is and what condition it is in
- presume materials contain asbestos unless there is strong evidence that they do not
- make, and keep up to date, a record of the location and condition of the asbestos-containing materials - or materials which are presumed to contain asbestos
- assess the risk of anyone being exposed to fibres from the materials identified
- prepare a plan that sets out in detail how the risks from these materials will be managed
- take the necessary steps to put the plan into action
- periodically review and monitor the plan and the arrangements to act on it so that the plan remains relevant and up to date
- provide information on the location and condition of the materials to anyone who is liable to work on or disturb them

## 5. Responsibilities

### 5.1 The Duty Holder

ELAN is the employer for all schools and therefore the duty holder under the legislation.

The Duty Holder responsibilities are shared between the ELAN (the employer) and the designated duty holder at each school (the Headteacher).

### 5.2 Trustees

Trustees are to champion good asbestos management across ELAN and support the aspirations of this policy. As key stakeholders, they are to be informed and furnished with overall asbestos management information, including where incidents have occurred, and corrective actions taken.

### 5.3 Chief Executive Officer

The CEO shall:

- Champion safety and asbestos management to all ELAN school staff, ensuring that appropriate time is provided to safety critical matters at relevant Trustee Board meetings.
- Provide such resource as is required to effectively manage the risk of asbestos
- Ensure that Trustees are provided with appropriate information on the management of asbestos across ELAN schools, including any action arising from asbestos incidents.

### 5.4 Trust Estates Manager

The Trust's Estates Manager will:

- Provide competent guidance to ELAN on its statutory obligations to manage asbestos materials
- Provide oversight and ownership of the Asbestos Management Policy

- Provide advice and guidance on actions to be taken in the event of any suspected release of asbestos materials
- Provide guidance on the investigation of any serious asbestos release instances, including the liaising with any enforcement officers
- Ensure that all schools-built pre-2000 have completed a site-specific Asbestos Management Plan
- Maintain and oversee a planned program of work to address any identified asbestos works in schools, reporting to the CEO
- Ensure that suitable contractors are vetted and selected for planned works to ELAN schools
- Maintain an asset and compliance management system to ensure that asbestos survey details, works and removals are appropriately logged and managed
- Report any incident that had the potential to release asbestos materials
- Ensure that appropriate audits are undertaken to assess the validity of asbestos management data
- Ensure that schools are provided with appropriate support resource
- Ensure that all project work is conducted with due regard for the risk of asbestos disturbance.
- Arrange, where necessary, the completion of any refurbishment and demolition survey to be undertaken and ensure that all asbestos works are undertaken by a competent UKATA accredited contractor.
- Ensure that all appointed contractors, where acting on behalf of ELAN are competent and made aware of the asbestos survey.
- Remove / suspend any works that, where not sufficiently managed, present a risk of asbestos disturbance.

## 5.5 Headteacher (The Local Duty holder)

The Headteacher of each school is responsible for the implementation of this policy and ensuring that all staff are aware of their roles and responsibilities, as well as the necessary control measures they need to undertake. The Headteacher will:

- Ensure that the duties outlined in the Policy are observed and communicated to relevant school staff
- Ensure that the school has a named **Responsible Person**, ensuring that they have sufficient time for the undertaking of training and the fulfilment of their duties. *Note this does not apply to schools constructed post 2000.*
- Report any building fabric damage immediately to the Trust's Estates Manager
- Ensure that all buildings built pre 2000 have an appropriate Asbestos Management Plan completed (using an ELAN supplied template)

## 5.6 Responsible Person (Schools)

The Responsible Person shall:

- Ensure that a site-specific Asbestos Management Plan is prepared for any school-built pre-2000
- Ensure that the Management Plan is effectively communicated to all school staff
- Monitor all contractor works at the school, ensuring that all contractors likely to be undertaking intrusive works view the asbestos register and sign the asbestos logbook
- Provide a key point of contact for the Trust's Estates Manager for matters related to asbestos management
- Provide onsite support for the investigation of asbestos related incidents
- Attend such training, as deemed necessary, for the fulfilment of their duties
- Report any incidents immediately to the Trusts Estates Manager.

## 5.7 School Site Staff

Site Technicians/Caretaking Staff are responsible for:

- Ensuring all relevant works to potential ACMs are undertaken in line with CAR2012
- Ensuring regular checks of all potential and confirmed ACM's are undertaken and reporting any issues in a prompt and formal manner
- Ensuring that the controls used are necessary, safe, and regularly reviewed.
- In conjunction with the Trust Estates Manager preparing an asbestos register identifying the location of asbestos containing materials for the premises, the risk presented by the asbestos containing materials and the priority for abatement.
- Communicating the asbestos management plan, policy and procedures by ensuring that any staff, pupils, contractors or visitors who may come into contact with asbestos containing materials are made aware of their location and the procedures to be followed if they are likely to disturb the asbestos.
- Formulating an emergency plan on the procedures to be followed if any asbestos containing materials are accidentally damaged.
- Ensuring risk assessments are prepared for the work activities they control ensuring due attention is given to the threats posed by asbestos at any particular site and adequate precautions are used.

## 5.8 All Staff

All staff must:

- Ensure they attend any health and safety course, including undertaking basic online asbestos awareness training or face to face asbestos awareness training, regardless of the building they work in
- Immediately report any defect or damage to the building that may have the potential to release asbestos debris or otherwise present a safety risk
- Follow any guidance and instruction provided by ELAN
- Never interfere or disable any safety precaution provided to safeguard occupants i.e., guarding, safety signage or workplace instruction
- Report immediately any contractor, staff member or visitor working in a way that may put others at risk or present a risk of damaging asbestos materials
- Champion safety at every opportunity, and make it their responsibility to educate others to create a safe place of work

## 6. Training

All members of staff including those with managerial responsibilities for Asbestos will receive training commensurate with their duties as identified in the table below:

Role	Training Requirement	Period
Designated Person (Trust's Estates Manager)	Accredited Responsible Person (Asbestos)	Every 3 years
Responsible Person (Headteacher's and any nominated Responsible Person)	Accredited Responsible Person (Asbestos)	Every 3 years
Site Technicians and Caretakers	Asbestos Awareness	Annual

All staff will complete the basic Asbestos Awareness training module on iAM's Compliant, whether or not the building is pre-2000.

**The attendance of the Asbestos Awareness and Management Training face-to-face delivery or on-line training Asbestos Awareness does not mean that the person completing the course is deemed competent to review the asbestos register or make an assessment of ACM's.**

## 7. Management of Asbestos

- All schools, that were built before 2000, **must** have a current Management Survey (which complies with up-to-date asbestos regulations)
- For schools built between 2000 and 2010, a design statement to confirm that asbestos was not used in the construction is sufficient. This includes items transferred from old buildings such as plant and equipment that may contain asbestos.
- If the school is planning either a demolition or refurbishment, then a Demolition and Refurbishment survey must be carried out before work commences.
- The above surveys must be carried out by ELAN approved licensed contractors with relevant UKAS Accreditation.
- The survey must include locations of any potential ACM's e.g., storerooms, yards, outbuildings, under floor services, pipes, ceiling voids, corridors etc.
- Each School must prepare an Asbestos Management Plan using the provided template document
- A **register** of location(s) of any ACM's must be recorded and include:
  - Date of inspection
  - Date of next review
  - Should be supported by a marked floor plan and photographs
  - Type of asbestos
  - What products it is contained in
  - The condition
  - Any remedial actions required

The environment around the ACM's is a significant risk factor. ACM's can deteriorate due to age, fire, flood, wear and tear, damage, therefore the register should be reviewed every 12 months by a Licensed Contractor with UKAS Accreditation, unless otherwise stipulated in the Management Survey report or School Asbestos Management Plan.

A copy of the register must be provided to **any person** who will be planning to undertake any intrusive building related works or any groundwork's which may either be near to or have the potential to disturb asbestos material. A logbook template is provided for all schools to use and will be checked by the Estates Manager (or other designated person) at planned site visits.

It should always be assumed that there may be asbestos material present when undertaking any work which may disturb the fabric and structure of the building, even if/where it has not been identified and included on the register.

Summary:

- An **assessment** of potential risk from the ACM's must be completed by a Licensed Contractor who is UKAS Accredited
- Consideration should be given to the condition of the asbestos materials, whether they are likely to be disturbed and what action is necessary to manage the risks
- From the outcome of the assessment, prioritise and rationalise an Asbestos Management Action Plan
- It must be ensured that all contractors sign the asbestos logbook where any intrusive works are to be undertaken.

### 7.1 Managing asbestos left in place

If the material is in good condition, well protected either by its position or physical protection e.g., encapsulated, reducing the likelihood of damage, and is unlikely to be worked on regularly or otherwise disturbed, it is usually safer to leave it in place and manage it.

The below guidance must be observed if any asbestos material is to be left in situ, removed, labelled, or encapsulated.



## 7.2 Labelling of Asbestos Materials

ACM's can be identified easily by the use of a sticker, placed on the location in a prominent position. The use of stickers must be carefully considered, they can become dislodged, moved and assumptions can be made over the limited extent of their use. The use or placement of stickers in communal areas, where they may cause unnecessary alarm is to ideally be avoided.

Where used, asbestos warning labels must contain the survey reference number and form part of the annual inspection program. Stickers must be affixed to clean, dry surfaces and placed in a prominent position.

Stickers are not an alternative to the review and signing of the logbook, but as a second line of defense only.



## 7.3 Removal of Asbestos Containing Materials (ACM's)

The removal of any asbestos material introduces a risk, as it will be disturbed as part of its removal. Schools must ensure that prior to undertaking any removal works that they notify the Estates Manager and instruct an ELAN approved contractor for any planned works.

On completion of an assessment of potential risk, if it is necessary to remove the ACM's, the Trust's Estates Manager must be informed immediately: 01934 313390.

Any contractor used for the removal of ACM's must have a current HSE License. The Estates Manager will undertake relevant due diligence of all approved contractors to ensure that all relevant RAMS and clearances are in place.

For removal works, requiring a 4-stage clearance certificate, the Trust's Estates Manager will instruct an independent analytical company, to ensure there is sufficient critical review of any works undertaken. All clearance certificates will be provided to the school in addition to being held on the central database. Under no circumstance can the removal and analytical company be the same, nor have any shared interest.

On removal, it must be ensured that the asbestos register is updated, and relevant staff informed.

## 7.4 Encapsulation

The process to encapsulate must be based on the fact that removal is not viable. Where encapsulation is to be undertaken, it must be ensured that the asbestos register is updated to reflect this, detailing the type of encapsulation used and monitoring requirements. Encapsulation works must be undertaken by a competent person. For low-risk tasks, such as small areas of painting and boarding, it may be possible for the school to undertake such activities, however consent to do so must be provided by the Trust's Estates Manager. This guidance will only apply to non-licensed work.

## 7.5 Monitoring

Where stipulated in the Management Survey report, monitoring is to be undertaken on known asbestos materials. Monitoring is undertaken to ensure that:

- Its condition is checked to identify any deterioration in its condition
- The room has not had changes in risk profile, such as a low use store becoming a workshop
- To identify changes in the environment, such as damage to the building fabric
- To identify damage to the asbestos material

Monitoring will generally involve the checking of the asbestos register, usually the associated photograph, against the actual conditions on the day. **Any changes or issues that may affect the original risk score must be notified to the Estates Manager immediately.**

All persons undertaking condition monitoring must have reviewed Asbestos Awareness training and be provided suitable time to undertake their duties.

All monitoring must be recorded in the on-site asbestos logbook and made available on request to ELAN staff for inspection.

Schools must ensure that their iAM's asbestos compliance entries are up to date and must flag to Estates concerns over data entry or iAM's log entries.

## **7.6 Continued Monitoring of ACMs**

All known ACMs will as part of the school's Planned Preventative Maintenance (PPM), monitored by periodic visual inspections undertaken by a competent person. The period between inspections will vary depending on the risk assessment findings, but as a rule this will be at 3 monthly intervals. Each school Site Technician/Caretaker will visually inspect ACM's within their establishment each three months. The Trust's Estates Manager (or designate) will undertake an annual visual inspection. All such inspections are to be recorded and any deterioration logged.

All Trust and Academy premises with known or presumed ACMs will be re-surveyed by appointed external competent persons at 2-year intervals. A record of this will be kept in the Asbestos Management Plan and Asbestos Register with accompanying photographs and CAD plan.

## **8. Communication**

### **8.1 ELAN Central Team**

All staff will receive basic online asbestos awareness training, to be repeated at three-year intervals or following any incident. Asbestos management will be communicated via the Trust's Estates Manager, including the overall performance of the remedial works program.

### **8.2 ELAN Schools**

All schools will ensure that where the school is of pre 2000 construction, that all staff have been briefed in the content of the site-specific Asbestos Management Plan and the key risk associated with asbestos. All schools are to ensure that a signed register is maintained, either via a standalone asbestos briefing or as part of staff induction, to confirm staff have received all relevant information. Where required, support can be provided by the Trust's Estates Manager.

As a minimum, school staff should be informed of:

- The name of the site Responsible Person
- The content of the Asbestos Management Plan
- The location of asbestos
- Any controls to be observed (i.e., no affixing to listed surfaces)
- Actions to be taken if they see damage or suspect release

## 9. Emergency Procedures

All schools must ensure that a detailed emergency response plan is contained within the site-specific Asbestos Management Plan, however as a minimum all staff are to observe the below actions.

### **If you discover material that you believe may contain asbestos:**

1. Stop any work in the area immediately
2. Clear the area of people who may be there
3. Stop others from entering by either locking or appropriate signage
4. Call the Trust's Estates Manager immediately
5. Samples will be taken to determine if asbestos is present

### **If you believe you have disturbed asbestos:**

1. Stop work immediately
2. Try to prevent any further spread of asbestos without endangering yourself or others
3. Clear people from the affected area
4. Stop others from entering, either by locking off or securing the area
5. Close windows and air handling units, if possible, to avoid further spread
6. Inform the Trust's Estates Manager immediately and await further instruction
7. Do not try to clean area until a sample has been taken and instructed it is safe to do so

**Note:** If you believe that others may have been exposed, ensure you collect names of those effected, this may include staff, pupils, and visitors.

## 10. The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)

Under the above regulations any of the following diseases occurring from an activity involving the working or handling of asbestos or any admixture of asbestos is reportable:

- Mesothelioma
- Lung Cancer
- Asbestosis

If you are contacted by an employee of ELAN, in relation to any of the above conditions, or want to report such a condition that you feel may in connection with a work-related activity at ELAN, please contact ELAN HR.

The Trust's Estates Manager and Competent Persons (Educating Safely) will ensure that all RIDDOR reports are reviewed and submitted, please do not submit any RIDDOR reports prior to them being reviewed and approved by the Trust's Estates Manager.

## 10. Monitoring and Review

This policy will be reviewed at least every three years by the Trustees in conjunction with the Estates Manager, who will make any necessary changes and communicate this to all staff.