



Great Learners Trust

Asbestos Policy and Management Plan

Elmhurst School

Approved by: Board of Trustees

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1 Intent

This policy applies to all schools in Great Learners Trust (GLT).

2 Aims

The aim of this asbestos policy and asbestos management plan is to ensure GLT schools achieve and maintain compliance with the duty to manage under Regulation 4 of the HSE Control of Asbestos Regulations 2012 (CAR 2012) – L143. All GLT schools aim to:

- Prevent exposure to the hazards associated with asbestos to the lowest reasonably practicable level
- Ensure the promotion of awareness to the hazards of asbestos through training and induction of staff and those working on behalf of the school
- Hold periodic meetings with relevant groups to increase awareness of asbestos issues and to develop, review and monitor the Asbestos Management Plan (AMP)
- Ensure the periodic re-inspection of identified Asbestos Containing Materials (ACM) and review of asbestos register
- Provide information and advice on asbestos issues to relevant persons
- Develop, implement and review an effective management strategy so that appropriate measures are undertaken, such as encapsulation (sealing), labelling, inspection or removal of ACMs

3 Guidance

3.1 Asbestos Containing Materials (ACMs)

ACMs can be found as a variety of types of materials and may not always be immediately obvious from their structure and finish.

The presence of ACMs does not necessarily constitute a danger to health; however, it is known to be hazardous when disturbed or damaged and must be treated accordingly. Activities which give rise to airborne dust, e.g. breaking, sawing, cutting, drilling etc are most likely to present significant risks. It is quite safe to leave asbestos in situ providing it is in a good condition and not likely to be disturbed.

Personnel whose work may bring them into contact with existing asbestos materials must be trained to recognize the possibility of its presence and what precautions to take to avoid potential exposure. Staff and contractors are not expected to work with ACMs nor be exposed to asbestos fibres.

Staff, contractors and other relevant persons must be provided with full information which identifies all known or likely ACMs within the school buildings and the likely risk they may pose.

3.2 Asbestos Management Plan (AMP)

The AMP is a working document. It sets out the school's asbestos management procedures. It is also designed to manage and minimize asbestos-related health risks to all persons working within, visiting or occupying its school buildings to as low as can be reasonably practicable.

The AMP sets out the mechanisms and method by which ACMs are managed in GLT schools and includes details on how they intend to:

- Identify and risk assess ACMs
- Produce a prioritized programme for the remediation of ACMs based upon their location and/or condition, together with their present, actual or perceived risk to health
- Protect those working on the fabric of any school building
- Protect those working within, visiting or occupying any school building
- Effectively control any work likely to affect ACMs
- Manage asbestos hazards based on the prioritization of the assessment of the risk to health
- Make arrangements for the engagement and monitoring of asbestos removal contractors

- Identify, monitor and maintain the condition of identified ACMs that are assessed as being suitable to be left in situ
- Effectively audit the AMP to ensure its continuing effectiveness

This AMP shall apply without exception to all buildings where schools have a duty of care under Regulation 4 of CAR 2012.

4 Roles and responsibilities

4.1 The Local Governing Board and Headteachers

The Local Governing Boards and Headteachers are committed to and accept their responsibilities under the Health and Safety at Work Act 1974; the Control of Asbestos Regulations 2012 (Regulation 4) and aim to comply with all Regulations, Approved HSE Codes of Practice and HSE Guidance Notes in respect of controlling the risk of exposure to asbestos within their school buildings.

4.2 The Main Duty Holder

The main duty holder is the **Headteacher**.

It is their responsibility to:

- Ensure adequate resources are provided and allocated to continue the implementation of the AMP
- Ensure that the implemented AMP is monitored so that working arrangements and provision of financial, technical, human, and other resources are suitable and sufficient to meet its requirements
- Ensure that requirements for the safe management of ACMs are fully identified and incorporated into any design or specification produced for works within their school buildings;
- Arrange and chair six monthly AMP review meetings

4.3 The Asbestos Coordinator (Appointed Person)

The asbestos coordinator is the schools Site Manager.

The asbestos coordinator is the appointed coordinator for the following asbestos management activities:

- Ensuring the contents of the AMP and procedures to be followed are fed through to all relevant staff, contractors, and other relevant persons
- Ensuring the school's continued compliance to Regulation 4 of CAR 2012
- Ensuring that identified ACMs are subjected to a formal risk assessment process
- Ensuring that a sufficient procedure is in place for the updating of the asbestos register where ACMs are removed, or remain in situ under a monitoring regime
- Ensuring all ACMs are clearly labelled using "warning contains asbestos" labels
- Arranging the annual asbestos condition survey and updating of the asbestos register
- Assessing, reviewing and recommending management actions in light of inspection findings and changes in statutory regulations or current best practice
- Ensuring relevant staff receive appropriate asbestos awareness training
- Arranging refurbishment and demolition asbestos surveys in support of all intrusive, refurbishment and demolition building works
- Ensuring that contractors working on any of the buildings are competent and have received formally appropriate asbestos awareness
- Attending the six-monthly AMP review meetings

4.4 Deputy Asbestos Coordinator

The deputy asbestos coordinator is the Headteacher.

The role of the deputy asbestos coordinator is to act as a supporting role to the asbestos coordinator. During the absence of the asbestos coordinator, the responsibilities as noted above are to be fulfilled by the deputy asbestos coordinator.

4.5 All Staff Members and Relevant Persons

Staff and relevant persons are to be advised to:

- Immediately report any known ACMs which are damaged or disturbed or any suspect ACMs not previously identified to the duty holder or the asbestos coordinator
- Immediately report any defects or concerns relating to asbestos issues or remedial works to the duty holder or the asbestos coordinator
- Contact the duty holder or the asbestos coordinator with regard to any work being undertaken by staff or contractors which may involve ACMs
- Attend asbestos awareness training as required

4.6 External Contractors

All external contractors are to contact the asbestos coordinator prior to any building works commencing. All contractors must:

- Ensure they have familiarized themselves with the asbestos management survey and asbestos register
- Comply with the AMP and relevant procedures
- Ensure that any sub-contractors are informed of the AMP and relevant procedures – in particular the location of any ACMs within the area to be worked in
- Ensure that emergency measures are in place for any suspected or known exposure to ACMs and that these confirm to the school's procedures
- Ensure no employee or sub-contractor works on any of the school's buildings without the formal written approval from the asbestos coordinator

5 Asbestos Management Plan - Duty to Manage Procedures

An asbestos management survey has been carried out in all GLT schools and a copy of this can be found within the Asbestos Management folder at each school. on **25 October 2023** by **CWE Services, Reference Number: J043046 (school) J043047 (school house)**.

Annual re-inspection surveys are planned and carried out by CWE Services, whose details can be found later in this policy, at all GLT schools.

ACMs were identified within various areas across the school. Details and locations of identified ACMs are set out in the aforementioned survey reports and asbestos registers, which will be located within the schools Asbestos Management folder.

Refurbishment and Demolition (R&D) surveys will be required to specific areas where any proposed intrusive, refurbishment or demolition works are planned. This will be coordinated by the asbestos coordinator or by the GLT's Head of Estates and Facilities.

5.1 Future and Ongoing Work

As part of the AMP and as required by Regulation 4 of CAR 2012, occupants and owners of premises have an obligation to inform any person liable to disturb ACMs including maintenance workers, about the presence and condition of such materials. If work to be carried out is part of a larger project which attracts the requirements of CDM, the health and safety plan prepared by the CDM coordinator should contain information on whether the materials contain asbestos and what type they are.

Future surveys and re-inspections will be carried out to comply with current HSE guidance.

A UKAS accredited inspection body, appropriately accredited to ISO/IEC 17020, will be appointed to carry out future surveys and re-inspections as required. CWE Services have been appointed by GLT as their preferred UKAS accredited inspection body. Their contact details are:

Company name: **CWE Services Limited**

Contact name: Nadine Lewis

Telephone number: 01934 838025

Email: N.Lewis@cwegroup.co.uk

All works with and/or adjacent to Asbestos Containing Materials (ACM's) are subject to a permit to work which must be completed and signed in full. No works with or near an ACM will be authorised to proceed without the prior written consent of a Permit to Work. Please refer to the Contractor Management Policy for further guidance on Permits to Work and for the relevant templates. The Asbestos Permit to Work template can be found on the GLT intranet under policies, procedures and templates.

5.2 Risk Assessment of ACMs

All ACMs noted within the asbestos register are objectively scored using a formal numerical assessment scheme. This contains aspects of both the material assessment and priority assessment using the algorithms shown within the HSE document HSG 227 'A Comprehensive Guide to Managing Asbestos in Premises'. There are two parts of the risk assessment scheme:

5.2.1 The Material Risk Assessment

This risk assessment covers the material alone and does not take into account its physical location. The material assessment is provided within the survey reports and asbestos register.

5.2.2 The Priority Risk Assessment

The priority assessment aspect considers the likelihood that persons may be exposed to asbestos fibres. This risk assessment combines the material risk assessment referred to above, together with locations and probability of causing harm to others. The combined assessments produce the final overall risk score and determine the action plan which is shown in the asbestos register.

ACMs with higher risk assessment scores are likely to require greater consideration regarding remedial measures than those with lower scores. The ACM scores are to be reviewed and updated where relevant at least annually by the asbestos coordinator in conjunction with the duty holder.

5.2.3 Priority Actions and Action Plan

The action plan is contained within the asbestos register. The action plan will be reviewed by the asbestos co-ordinator on a six monthly basis to ensure the necessary actions are/have been carried out.

5.3 Management Options

5.3.1 Leaving ACMs in situ

ACMs in good condition and not likely to be disturbed must be labelled (where appropriate) and left in situ. These will be re-inspected at intervals as set out in the asbestos register. The asbestos co-ordinator will ensure this is actioned and the asbestos register and survey reports updated accordingly.

Labelling with standard 'asbestos warning' labels will be carried out to all known ACMs where deemed appropriate in order to assist in preventing accidental damage.

5.3.2 Repairing/Encapsulating/Removing ACMs

The asbestos coordinator shall ensure that damaged or ACMs likely to be damaged or disturbed are repaired/encapsulated or removed as deemed necessary. The asbestos register and survey reports shall be updated accordingly. Any remedial/removal works shall be carried out in accordance with current asbestos regulations.

5.3.3 Asbestos Register

The asbestos co-ordinator shall ensure the asbestos register is audited on a six monthly basis to ensure that it has been kept up to date.

5.4 Communicating and Sharing the Management Plan

5.4.1 Asbestos Management Plan and Survey Reports

The asbestos coordinator shall ensure the management plan and survey report(s) are readily available and that all relevant persons are advised of the asbestos management plan, ACMs located within the school buildings and the actions to be taken in the event of any disturbances to the ACMs.

5.4.2 Emergency Services

The asbestos register and survey reports are to be made available to any emergency services where their presence could disturb ACMs.

5.4.3 External Contractors

The asbestos coordinator is responsible for ensuring that contractors or any person working in the school buildings is made aware of and reads the asbestos register and survey reports prior to carrying out any works. Contractors or persons working in the school buildings will be required to sign a document stating they have read and understood the asbestos register and support report(s) and are aware of identified ACMs.

The asbestos coordinator is responsible for ensuring the records held are sufficient for the works to be carried out and, if not, they shall ensure that a refurbishment asbestos survey is carried out by a UKAS accredited surveying company prior to the works being carried out.

Contractors are to be advised that should they locate any materials which could contain asbestos, they are to stop works and advise the asbestos coordinator immediately.

6 Emergency Procedures

CAR 2012 requires employers to take action in the event of escape of asbestos fibres into the workplace. The requirement is to keep all persons away from the affected area apart from those carrying out the emergency remedial work.

To comply with this requirement the school has produced an emergency plan in order to deal with an asbestos emergency.

Clearly, not every event where people come into proximity with actual or suspected ACMs constitutes an emergency. Where there is any doubt, the school's policy is to treat the situation as an emergency until further notice.

Emergency situations can relate to situations where:

- ACMs are clearly damaged
- Suspect ACMs are encountered/damaged
- Remedial works result in release of elevated airborne fibre levels
- Non-licensed personnel require urgent access to an asbestos remedial works area

In all cases the asbestos coordinator should be contacted immediately.

The following measures are to be taken to prevent or minimise the exposure of personnel to asbestos fibres.

6.1 Potential Emergency Situation

Suspected ACMs

If suspect materials are discovered immediately vacate the area and inform the duty holder or asbestos coordinator whose advice should be followed.

If the duty holder or asbestos coordinator cannot immediately be contacted:

- Vacate the area immediately - **(Do not Re-enter)**
- Close the door and seal off area
- Prevent others from entering the area
- Use signage, warning tape, padlocks, etc

Damaged ACMs

Immediately vacate the area and inform the duty holder or asbestos coordinator.

The duty holder and/or asbestos coordinator will take appropriate action to prevent exposure to persons and engage the services of GLT's approved UKAS accredited inspection body to conduct the necessary asbestos checks.

If asbestos remedial works are required, the asbestos coordinator will arrange through a licensed asbestos remediation contractor. The GLT's approved asbestos remediation contractor is:

Asbestos company name: **Rhodar**

Contact name: Mark Van Praagh, Senior Contracts Manager

Telephone number: 020 8591 6677

Mobile number: 07841 451972

Email: m.vanpraagh@rhodar.co.uk

Airborne fibre monitoring will be carried out if deemed necessary. All monitoring records must be retained on site and held by the asbestos coordinator to demonstrate compliance with CAR 2012.

6.2 Actions to be Taken by Asbestos Coordinator in the Event of an Emergency Situation

The asbestos coordinator is instrumental in the coordination and ongoing remedial arrangements of any emergency actions relating to asbestos.

The following is a guide to the procedures they will be required to undertake:

- Prevent access to the area
- Immediately raise an incident log on GLT's asset management system (Parago)
- Arrange for a UKAS accredited surveying/analytical company to attend site to sample the suspect material (if ACM content is unknown) and to arrange reassurance air tests in the event of damage to any ACM
- Arrange for a licensed asbestos remediation contractor to carry out an emergency environmental clean in the event of damage to any ACM or a suitably competent trained contractor to carry out the works if the ACM is a HSE non notifiable material
- Ensure incident log and asbestos registers are updated to reflect work carried out

The above emergency procedures are summarised in the flow chart shown in Appendix A.

7 Monitoring arrangements

The application of this policy is monitored by GLT's Head of Estates and Facilities in conjunction with headteachers, asbestos coordinators (and their deputies), and GLT's approved UKAS accredited inspection body through termly premises compliance checks and Health and Safety inspections and audits.

Copies of all asbestos compliance paperwork are to be retained in a central location by each school and made available to GLT's Head of Estates and Facilities and approved contractor.

This policy will be reviewed by GLT's Head of Estates and Facilities every twelve months. At every review, the policy will be shared with and approved by the board of trustees.

All relevant persons are required to familiarise themselves with the workings of this policy as part of initial implementation, induction training and every twelve-months thereafter as an ongoing requirement.

8 References

This asbestos policy and asbestos management plan links with statutory provisions, Approved Code of Practice's and other HSE guidance including:

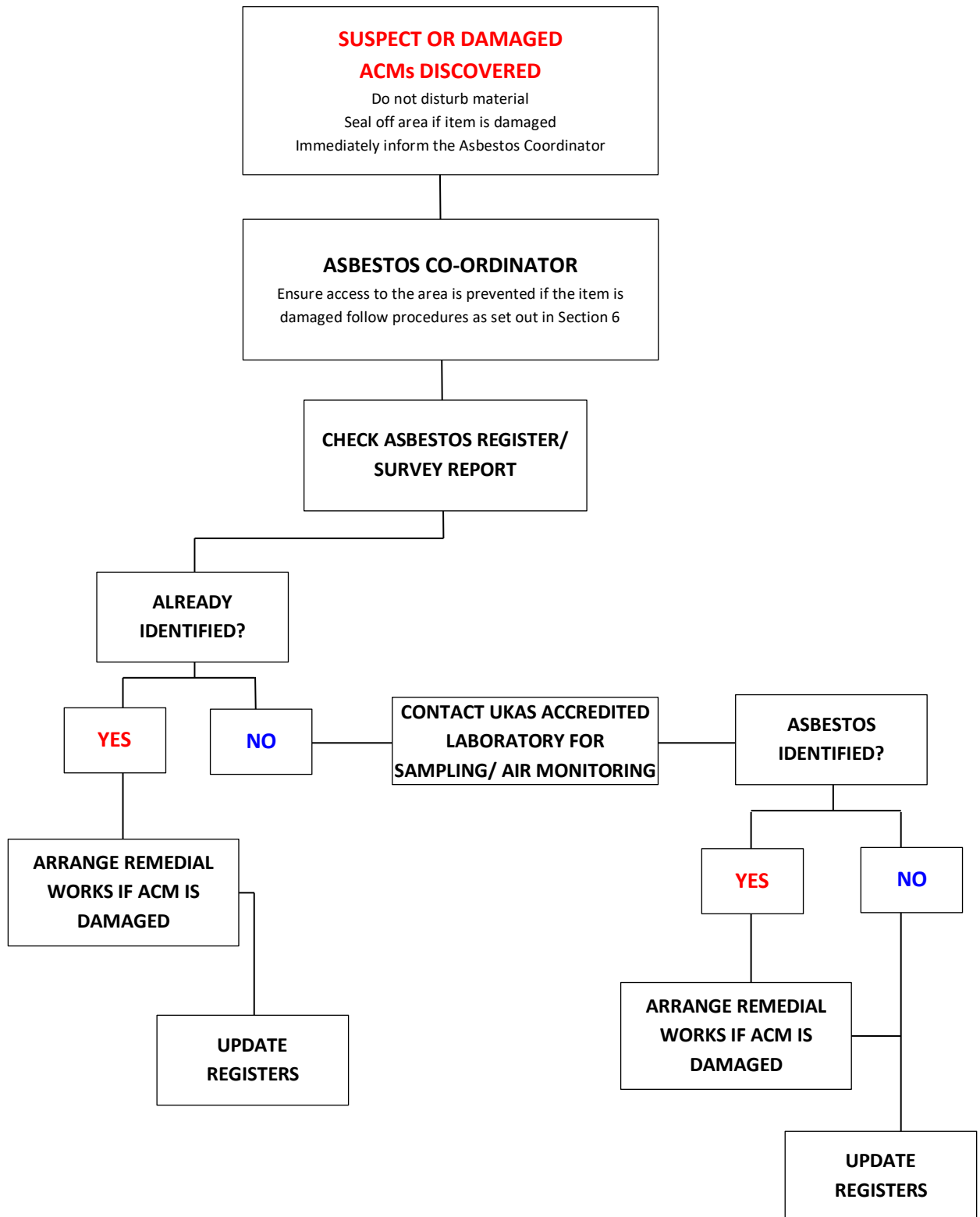
- The Health and Safety at Work Act 1974
- Management of Health and Safety at Work Regulations 1999
- The Education (School Premises) Regulations 1999
- COSHH 2002
- Control of Asbestos Regulations 2012 (CAR 2012) – L143
- CDM (Construction Design and Management) Regulations 2015
- HSG (Health & Safety Guidance) 247
- HSG (Health & Safety Guidance) 248
- HSG (Health & Safety Guidance) 264

This list is not exhaustive and this policy will also have regard for statutory and non-statutory guidance to ensure that GLT's schools are a safe place to work and study. This policy should be read in conjunction with the following GLT frameworks and policy documents:

- Health and Safety Policy
- Contractor Management Policy
- Risk Assessment Policy
- COSHH Policy
- Fire Safety Policy

9 Appendix A

EMERGENCY PROCEDURES IN THE EVENT OF SUSPECT OR DAMAGED ACMs DISCOVERED



10 Appendix B
Typical asbestos warning signs



**Caution
Asbestos**



**DANGER
Asbestos**



**Do not
disturb**



**Report
accidental damage
immediately**