

Asbestos management Policy, Standards, procedure and Guidance 2014



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Introduction

The Council has responsibility for a broad range of sites and buildings which encompasses corporate, operational, our local community schools as well as a commercial investment portfolio. It is most likely that asbestos-containing materials are present in a number of these buildings if they were constructed before the 1990's. This guidance document relates to the management of asbestos containing materials (ACM's) within the council buildings and the potential hazards arising from exposure to such materials if they are in poor condition or become damaged. The Council has a responsibility for the management of asbestos within its buildings as an employer where this is the case fulfilling its duty of care to its staff, but also to service users and the public who may be affected by the Council's undertaking. This guidance document considers the day to day management of asbestos as part of its business as usual activities and secondly when project work is undertaken such as refurbishment or remodelling of buildings and/or the installation of infrastructure such as ICT.

The Council's existing practices and policy on the management of asbestos containing materials (ACMs) are brought into line with current legislation by this guidance and replaces all previous policy documents on the management of asbestos in buildings by this document.

What is Asbestos?

Asbestos is the name given to a group of naturally occurring minerals that are contained within rock and are mined outside of the UK. These minerals appear as masses of strong, flexible fibres that can be separated into thin threads and woven. Asbestos fibres are stronger than steel, resilient, not affected by heat or chemicals or do not conduct electricity. Dubbed the magic mineral, for these reasons they were widely used in the building industry for many applications which equated to 6,000,000 tonnes being imported into the UK during the 20th century for processing creating over 3000 known products for the building industry alone. When viewed that asbestos was added in the manufacture of products sometimes as little as 3%, the quantity of material used ACMs within the building industry was substantial. The importation and use of Asbestos was banned in the UK in 1999 and 2005 in the EU to protect everyone.



Advocate Asbestos mine 1980

What are the hazards associated with ACMs?

Initially seen as a wonder product because of its inherent properties, health issues including high mortality rates were directly attributed to occupational exposure to workers and their families in the asbestos industry in producing ACM products. It was also recognised that operatives involved in the building industry using ACM's increasingly accounted for the asbestos related health issues compounding current and future death tolls.

The reason behind this was working with asbestos or asbestos containing products released fine asbestos fibres which would be unseen to the naked eye. The breathing in of air which contains asbestos those fibres can lead to asbestos related diseases which include Pleural plaques, Asbestosis, Lung cancer and Mesothelioma for which the disease can take 10 to 60 years to develop. It is possible that repeated low-level exposure may lead to asbestos-related diseases, although high exposure for long periods is linked more clearly to these illnesses hence the correlation of working with asbestos or ACMs.



An operative working with Asbestos in 1970

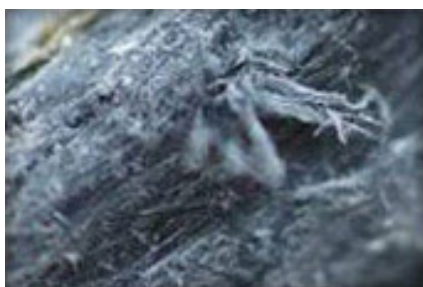
Today approximately 5,000 deaths are asbestos related which is due to rise to an estimated 10,000 between 2020 and 2025 due to the long gestation periods. As a comparison current figure death figures from asbestos related diseases are higher than those on roads in the UK.

What are the types of Asbestos?

Asbestos is the common name given to the group of naturally occurring minerals however there are three predominant types commonly found in Asbestos Containing Materials (ACMs) in the UK. Asbestos is often classified by colour however it cannot be identified by this means alone as there are natural variations in colour within types and the colour may change through the action of light, heat and age. In addition, asbestos combined with other materials such as binding agents will take on the colour of the other material so identification of asbestos type is carried out using microscopy or other approved methods.

In its raw form the three common types of Asbestos are;

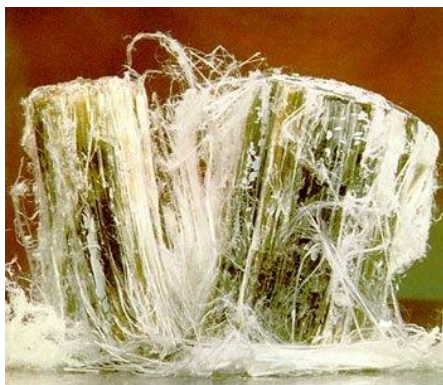
Crocidolite Asbestos sometimes known as blue Asbestos is generally considered to be the greatest health risk. Crocidolite is mined mostly in South Africa and is known for its heat resistance qualities where it was often used to insulate boilers, pipe insulation and cement products.



Amosite Asbestos, known often as brown Asbestos is mined in Africa where it has been frequently used in cement sheet and pipe insulation. It can also be found in insulating board (which contained up to 40 percent Asbestos), ceiling tiles and in thermal insulation products.



Chrysotile Asbestos often referred to as white asbestos is the most commonly used form of asbestos in buildings and can be found in roofs, ceilings, walls and floors as well as brake linings, pipe insulations gaskets and boiler seals. Although it is more prevalent, some studies show it takes more exposure to Chrysotile than other types of asbestos to develop related diseases.



Typical uses of ACMs in buildings.

Asbestos in its various forms has been widely used over the last 100 years in many different situations and circumstances. Some of the more common applications seen within our council buildings are described below.

Sprayed Asbestos - This is an application of hydrated asbestos cement mixture (up to 90% asbestos of any type) by means of a spray gun to provide fire protection and thermal and acoustic insulation which was often called Limpet or Flock insulation. Sprayed asbestos was often applied to structural steelwork and other areas where access was difficult or where the area was large or awkward. It is considered very high risk in terms of human health as it is very friable and will readily release fibres if damaged or through age. It is also extremely prone to damage during repair and maintenance work. The application of sprayed asbestos coating was prohibited in the UK in 1974.



Typical example of sprayed asbestos to a steel beam

Asbestos Lagging This is another high risk product. Asbestos in various forms has been used for many years for pipe and boiler lagging. Asbestos products used for lagging include preformed pipe sections, slabs, rope, tape, corrugated asbestos paper, quilts, felts, blankets, plastered cement, etc. This is considered to be a similar health risk to sprayed asbestos. Asbestos lagging can contain a high proportion of asbestos (up to 85%) held in a loose matrix with its binding material. Asbestos content was phased out during the 1970's.



Asbestos lagging to heating pipes

Asbestos Insulating Board (AIB) - Is a semi-compressed product, asbestos insulation board normally contains 25 - 40% Amosite mixed with hydrated Portland cement although occasionally Chrysotile was added. This was a commonly used building material found in all types of buildings including residential properties as well as commercial buildings and schools. It was used for structural fire protection, internal wall and ceiling linings, ceiling tiles, duct and door linings and any other place where a general building board can be used.

It is considered higher risk than asbestos cement since it is softer and has a higher asbestos content. Consequently it is more likely to release fibres, especially if in a position where it can be damaged or abraded. These boards were manufactured in UK up to 1980.



AIB formed ceilings

Asbestos Cement - Normally asbestos cement contains 10 - 15% Chrysotile bound in hydrated Portland cement and compressed into the desired shape. These products are generally high density and when uncoated are normally light grey in colour.



Corrugated asbestos cement sheeting to form roof coverings

Asbestos cement was used in the manufacture of sheet roofing, weather boarding, panelling, cladding, guttering, rainwater pipes, cisterns, tanks, drains, vent and flue pipes. Cement products were manufactured up to prohibition in 1999.

Other Applications - These include millboard and paper which may have an asbestos content approaching 100% and were used for insulating electrical installations, thermal insulation and for fire-proofing doors.

Asbestos was used with vinyl to produce vinyl asbestos floor tiles which commonly contain 5 - 7% Chrysotile. Yarns, ropes and textiles have all been previously manufactured using asbestos. The products ranged from protective clothing and blankets to rope for thermal insulating and plaited asbestos produced to provide flexible insulation for electrical cables.

Paints and other decorative surface coatings have been manufactured containing asbestos to provide strength, cohesion and particular surface finishes. Pre-1985 artex and artex-type textured wall and ceiling coatings would often contain asbestos.

Standards & Legislation

The Council recognises its responsibilities as an employer under the Health and Safety at Work Act 1974 to provide and maintain so far as is reasonably practicable, a healthy and safe environment for employees and those who may also be affected by the Council's undertaking.

The Control of Asbestos Regulations 2012 (CAR 2012) places a responsibility upon the Council to identify Asbestos Containing Materials ACM's within their properties in terms of location, type and condition so to assess the level of risk and implement an Asbestos Management Plan to manage those risks.

The duties imposed by Regulation 4 of CAR 2012 supplement the requirements of other pieces of legislation including;

- sections 2, 3 and 4 of the Health and Safety at Work Act 1974,
- the requirement for risk assessment under the Management of Health and Safety at Work Regulations 1999,(including the 2006 Amendment)

- the Workplace (Health, Safety and Welfare) Regulations 1992 which require employers to maintain workplace buildings so as to protect occupants and workers,
- the Construction (Design and Management) Regulations 2015 also require the client to pass on any information about the state or condition of premises to the Principle Designer before work begins,
- and the Defective Premises Act 1972 which requires Landlords to ensure that Tenants are free from harm resulting from the state of the premises.

To allow organisations to make more informed decisions in respect of asbestos in their premises additional legislation and guidance is used from the following documents to manage asbestos;

- Asbestos licensing regulations L11 (1983 as amended 1998)
- A comprehensive Guide to managing Asbestos in Premises HSG227
- Asbestos: The survey guide HSG264 (Second edition)
- Asbestos essentials: A task manual for building, maintenance and allied trades on non-licensed asbestos work HSG210 (Third edition)

In summary the asbestos regulations contain the main requirements for the statutory control of asbestos in the workplace and non-domestic buildings, including the duty to manage asbestos where the main requirement of the regulations is the prevention of exposure of asbestos fibres to its employees and others.

The Councils Asbestos Management Policy Statement.

The Council recognises and fully accepts its responsibilities to protect the health and safety of its employees, tenants, pupils and any person who may be affected by its activities, including contractors and any other person who may carry out work in any premises it has control over. This responsibility extends to ensuring, so far as reasonably practicable, that no person will be exposed to airborne asbestos fibres at levels which are harmful to health. In view of this the Councils published its policy statement in 2012 which stated;

‘Waltham Forest Council will effectively manage the risks presented by Asbestos and asbestos-containing materials (ACMs) in all Waltham Forest Council buildings.

Waltham Forest Council aims to:

- *Prevent, or reduce to the lowest level practicable, the risks from asbestos to all employees and users of our buildings whether working, occupying or visiting Waltham Forest Council premises.*
- *Comply with all statutory provisions relating to the management of asbestos materials so far as is reasonably practicable.*

- *Implement effective asbestos management procedures in compliance with HSE guidance, A Comprehensive Guide to Managing Asbestos in Premises (HSG 227).*
- *Leave in place all ACMs which are in good condition, sealed and/or repaired, and which are unlikely to be disturbed in line with the above guidance.*
- *Identify and record, so far as is reasonably practicable, the location, extent and condition of ACMs present in the buildings for which Waltham Forest Council is responsible.*
- *Regularly monitor and inspect identified ACMs to assess the risks and to use these assessments to prioritise remedial action where necessary.*
- *Ensure that any works with the potential to disturb asbestos materials in all premises for which Waltham Forest Council is responsible, are undertaken with the approval of the Compliance Team and the Programme & Projects Team in the Environment & Regeneration directorate, keeping all interested parties updated including the Trade Unions.*
- *Ensure that all Asbestos surveys are carried out by competent persons*
- *Ensure that any remedial works to asbestos containing materials are carried out by licensed asbestos removal contractors.*
- *Provide assurance on the effective management of Asbestos and ACMs by reporting on the progress of surveys, risk assessments and works relating to asbestos to the Corporate Health & Safety Committee.*
- *The Council will work together with the Trade Union representatives in accordance with the 1977 Trade Unions Safety Regulations in order to fulfil the requirements of this Policy.*
- *Provide information relating to the location of asbestos materials to staff occupying Waltham Forest buildings, including contractors and any other person who may disturb asbestos materials.*
- *Provide appropriate training for those staff involved with monitoring or managing asbestos.*

Managing Asbestos within Council Properties

Primarily the duty falls on the Council itself to ensure the risk from Asbestos Containing Materials (ACMs) are adequately managed for the sites and buildings it controls and that adequate resources both financially and human are provided to enable full and effective operation of the above policy. Here it has put in place effective management structures, mechanisms and suitably experienced individuals to be managerially responsible for the implementation and monitoring of the appropriate control measures to manage asbestos.

Within The Control of Asbestos Regulations 2012 it imposes a specific duty to manage asbestos on any person called the Duty Holder who has a responsibility for the control, maintenance or repair of any part of a site or building. For Waltham Forest Council the nominated Duty Holder is named as the Chief Executive of the Council who has ultimate control of finances, resources and therefore responsibility.

Through the hierarchy of the Councils management structure this is in-turn delegated through to the Assistant Director Asset Management and Delivery who have the management and financial responsibility through to the Compliance Manager who has responsibility for overall compliance on a day to day basis and who will manage such as programmes of inspection, remedial works, advice and training.

Managers with a responsibility for premises are deemed The Responsible Person who would be responsible for Asbestos management on a day to day basis at their premises.

For Community Schools the Duty holder responsibility is again the Councils Chief Executive who will ensure programmes of inspection are in place via the Compliance Manager however the Headteacher has joint Duty Holder responsibility for the sites and buildings that they control. They may nominate a Responsible Person such as a school Bursar to ensure Asbestos Management is in place on a day to day basis.

For sites for which the Council have no control such as a Voluntary aided or Academy Schools the Council have no responsibility and here the Governing Body is deemed to be the Duty Holder which is delegated to the Headteacher.

For Housing properties the scope of the legislation is limited to communal areas and the Councils Housing partner Ascham Homes are responsible for their own arrangement in terms of Asbestos Management.

Asbestos Management Surveys

The Compliance Team will undertake Asbestos Management Surveys to all sites and buildings where the Council has a corporate responsibility. These will include Corporate, Community Schools and Commercial Properties.

The Council will only appoint licenced and UKAS ISO17020:2004 accredited companies to undertake these specialist surveys which will be on an annual basis and more frequent if individual circumstances require.

The Asbestos Management surveys themselves are visual in that they are non-intrusive where the specialist surveyors will ascertain and identify the location of any ACM's within the council buildings along with its type, current condition and any remedial actions or recommendations.

For ACM's that are in good condition, undamaged and unlikely to be subsequently damaged or interfered with, these will normally be managed and left in place, periodically re-inspected annually or more frequent as described above.

Where the risk of exposure from the ACMs can be eliminated by repair and enclosure or encapsulation, this will be the recommended course of action. Any ACMs that cannot be repaired/encapsulated and or are in poor condition or friable (likely to release fibres into the atmosphere) based on survey the most appropriate form of remediation will be undertaken by a licensed asbestos removal contractor. The Compliance Section will determine the most appropriate control measures following consultation with appropriate specialist external consultants surveyors and contractors.

If during the management surveys ACM's are identified which present an immediate risk which regards to shedding fibres into the atmosphere the compliance team will undertake the following actions.

- Inform the building manager or person responsible for the management of the site.
- Impose a restricted access arrangement to the affected area based upon individual circumstances so to contain the area.
- Undertake reassurance air tests to ascertain if asbestos fibres were in the atmosphere.
- Make arrangements and undertake an environmental clean of the affected area under controlled conditions working closely with the building manager or person responsible for the site to minimise disruption to service delivery

All companies engaged by the Council to undertake any work involving the remediation of ACM's will be licensed asbestos removal contractors.

Asbestos Management Plan

The Asbestos Management Survey will be incorporated into a site specific Asbestos Management Plan, the purpose is to assist managers with responsibility for premises in the safe day to day management of their premises so that they are aware of the location of any ACMs.

Once compiled a hard copy of the Asbestos Management Plan is delivered to site where it should form part of the suite of documents contained within the Red box file. (The Red box holds the key property related information for the site and should be readily available to site visitors if requested).

Managers should

- Be familiar with the Asbestos Management Plan.
- Ensure that staff or contractors undertaking any works on the fabric of the building or fixed plant and equipment consult the Asbestos Management Plan prior to the commencement of work.
- Ensure where the Asbestos Management plan identifies that there is a risk of damaging or disturbing, known or presumed ACMs works are suspended and the Compliance team is contacted.
- Ensure the Permit to Work system is followed; when undertaking works in the premises. (Permits to Work are located within the Asbestos Management Plan).
- Carry out regular checks to known or presumed ACMs as identified in the Asbestos Management plan.
- Should known or presumed ACMs become damaged that they contact the Compliance team immediately.

The Councils term maintenance contractors are contractually bound to inspect the Asbestos Management Plan before commencing works on site although the responsibility lies with the responsible manager to ensure this happens.

Advice and guidance in the use of the Asbestos Management Plan is available from the Contracts & Compliance team for which individual briefing of the document is offered as these are annually updated. Asbestos awareness training is also offered during the year, details of dates are available through the Councils Health & Safety Team.

The Asbestos Management Plan should also be made available to the emergency services if they attend site during operational hours who may request sight of the document.

The Corporate Asbestos Register- Concerto Database

The information captured from the Asbestos Management Surveys and any subsequent remedial works is incorporated within the Councils Corporate Asset Management System called Concerto. This database act as the Councils Corporate Asbestos Register for the effective ongoing management of ACM's within its corporate, commercial and community School buildings. The system is used to capture all survey information, any changes to ACM such as removal or encapsulation so that there is an accurate historical record and audit trail of that site since 2013 but also if where new information concerning the location of ACM's come to light.

All Duty Holders, Headteachers, and Managers with responsibility for premises are able to access the Asbestos Management Information on line which will be identical to their current Asbestos Management Plan. Copies of the Asbestos Management plan can also be downloaded. If you require access please contact the Compliance team.

Refurbishment & Demolition Surveys

The undertaking of improvement works to buildings such as refurbishment, remodelling or simply installing additional infrastructure such as ICT can have major implications on the disturbance of ACM's within buildings. The reason to this is that although we have already visually identified ACMs within council buildings there will be many components of a building where ACMs have been used as part of its construction which are hidden only to be revealed, disturbed or possible damaged by the proposed works.

This presents one of the greatest risks to the Council which can only be mitigated by undertaking more intrusive approach called a Refurbishment and Demolition Survey.

Unlike the management survey which is purely visual the Refurbishment and Demolition survey sets to explore the under lying components of the buildings fabric in an focused area where future works are to be undertaken. This is so that Architects, Surveyors and Engineers are aware as best for the presence of ACMs

which can be considered and managed. The nature of the surveys can be disruptive and destructive for which the Professional team would fully discuss with the client before proceeding.

The Council has worked closely with its Professional Services Partner NPLS to develop a separate Asbestos Management Protocol which is a collation of best practice procedures broken down into a series of Gateway reviews. The purpose is to ensure that as a proposed alteration or improvement to a building develops in terms of scope, and specification the implications of ACMs are considered at each Gateway review where progress to the next stage can only be achieved by satisfying the control measures imbedded in each of the stages.

Building managers or staff who propose to undertake such works which may affect the fabric of the building and who are not familiar with the Asbestos Management Protocol should contact the Compliance team in the first instance for advice & guidance.

Managing Possible Exposure Incidents

Where an ACM (or suspected ACM) has been damaged or disturbed to such an extent that there may be a risk of inhalation of asbestos fibres, all work in that area must be halted, the area evacuated, sealed off and the Compliance Team notified immediately on 020 8496 8125

Only authorised personnel will be allowed in that area until it is declared safe by the Compliance section

An incident/accident report form should be completed if a person considers they may have been exposed to airborne asbestos fibres. This should be forwarded to the Council's Health & Safety Team. The Compliance team will as part of the response undertake air tests by a specialist provider to ascertain if asbestos fibres have been released. The incident/accident forms with the independent air tests will be retained on the employees file for a period of 40 years.

Once the Health and Safety Team receives the form, they will send the Asbestos incident form to the manager for completion. The manager will complete the first section, and then forward the form to the Compliance Officer in Corporate Assets for completion of the second section which will include information of what actions have been taken, results of any air tests and information that has been given to staff.

This will then be sent back to the manager and HST for storage on the individual's SAP record and HST'S O DRIVE

Further Information

For further information in terms of advice and guidance the Compliance team can be contacted on ContractsandCompliance@walthamforest.gov.uk or telephone 020 8496 8125

Version control

Document Information

Title	Asbestos Policy
Document Type	A policy on asbestos management for Waltham Forest Council
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