

# Pontefract Academies Trust

## Asbestos Management Policy and Plan

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Issue 2	Prepared by:	Verified by:
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## Contents

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	Page
<b>1 Asbestos Policy Statement</b>	
1.1 Asbestos Policy Statement	1
1.2 Statement of Intent	2
1.3 Responsibilities for Asbestos Management	3-4
<b>2 Summary</b>	
2.1 Current position and initial objectives	5
2.2 Managing asbestos in buildings	5
2.3 Re-inspections	6
2.4 Asbestos register	6
2.5 Asbestos surveys	6
2.6 Risk assessment and action plan	7
2.7 Prevention of exposure	
2.8 Actions to prevent exposure	7-8
<b>3. Training and Communication</b>	
3.1 Training	9
3.2 Routine Maintenance procedure	10
3.3 Routine Refurbishment procedure	11
<b>4. Emergency Procedures</b>	12-14
<b>5. Policy Implementation</b>	15
<b>Appendices</b>	
Appendix 1: Contact Details	16
Appendix 2: Desk Top Review including action plan	17

# 1. Asbestos Policy Statement

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## 1.1 Asbestos Policy Statement

This policy has been developed to manage the risk from asbestos within the framework of the current legislative requirements of the Health and Safety at Work Act 1974, the Management of Health and Safety at Work Regulations 1999, and the Control of Asbestos Regulations 2012. The Trustees of the Pontefract Academies Trust (“the Trust”) acknowledge our duty under legislation to manage asbestos within the workplace.

We recognise the health risks resulting from exposure to asbestos fibres in the air and the need to protect persons from such exposure. It is our duty to manage the risks from asbestos aiming to eliminate or reduce to the lowest level reasonably practicable the health risks to employees, tenants, contractors, visitors and others.

This policy has been produced to set out the procedures we have put in place to protect employees/learners occupying the premises for their normal day-to-day activities, contractors engaged in maintenance, repair or refurbishment work, and visitors or others from unnecessary exposure to airborne asbestos fibres.

Our policy is that all asbestos containing materials that are damaged, or in poor condition, shall be removed, and any remaining asbestos containing materials that have above a low potential to release fibres if disturbed shall be encapsulated and managed throughout the Trust portfolio.

An annual management inspection programme has been implemented in accordance with Regulation 4 CAR 2012. Extensive removal/remedial works have been undertaken throughout the trust portfolio bringing all asbestos containing material into a manageable condition. All site-specific management plans have been updated to reflect the work completed.

**The Trust** has overall responsibility for managing the risks from asbestos across the property portfolio and is the main duty holder under Regulation 4 CAR 2012 ***Duty to Manage Asbestos***.

The requirement placed on the Trust to manage asbestos in its premises by the regulations is implemented through the management structure, with the full professional advice and support from Inspectas. All school leadership teams, employees, and contractors operating in Trust premises must co-operate with Inspectas to allow the Trust to comply with legislation.

This policy will be reviewed at least annually to ensure that it has been implemented and complied with, and that the procedures are effective in managing the risk from asbestos.

Signed:

**Phil Jones**

Chair of the Trust Board

Date: 29 January 2018

# 1. Asbestos Policy Statement

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## 1.2 Statement of Intent

1.2.1 It is our policy to meet the obligations placed by the Health and Safety at Work Act 1974 and the Control of Asbestos Regulations 2012 (CAR).

To achieve compliance with regulation 4 of the Control of Asbestos Regulations, we will:

- Take reasonable steps to find materials within our property portfolio likely to contain asbestos and to check their condition;
- Presume that materials contain asbestos unless there is strong evidence to support that they do not;
- Make a written record of the location and conditions of asbestos and presumed asbestos-containing materials (ACM's) and keep the record up to date;
- Assess the risk of the likelihood of anyone being exposed to these materials.

Prepare a plan to manage the risk to ensure that:

- 1) Any material known or presumed to contain asbestos is kept in a good state of repair or removed;
- 2) Information on the location and condition of the material is given to anyone potentially at risk;
- 3) Undertake periodic reviews of the plan and instigate regular inspections (annually) of retained and presumed ACM's.

1.2.2 Accurate Asbestos Registers for each school will be maintained by Inspectas identifying areas of the buildings or plant either as containing asbestos or asbestos free.

The asbestos register will be updated when any changes occur, e.g.) removal and replacement with non-asbestos materials or a major change following refurbishment works. Inspectas will undertake this update and all superseded versions will be available on the online EMS portal.

Prior to carrying out any work within the fabric of the building, a suitable and sufficient assessment shall be made. This shall be a refurbishment or demolition survey, as described by **HSG264 'The surveyors Guide'**

1.2.3 Where work on Asbestos is to be carried out whether this is Licenced, non-licenced, or notifiable non-licenced, it is our policy that the work will be undertaken by Contractors holding a current asbestos licence issued by the Health and Safety Executive Licensing Unit.

An annual review will be carried out to ensure that the requirements of this **Asbestos Management Policy and Procedures** are updated as necessary.

We will:

- Provide adequate resources for the management of asbestos materials products required by these procedures;
- Seek to provide adequate training to those members of staff who require greater awareness of the effects and uses of asbestos on an annual basis;
- Review the Policy Document on an annual basis, to take account of changes to legislation or current practice.

# 1. Asbestos Policy Statement

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## 1.3 Responsibilities for Asbestos Management

### 1.3.1 Duty Holder

The **Chief Executive Officer** is the main person within the Trust with the responsibility for the ensuring the maintenance and repair of the Trust's portfolio of properties and is therefore main duty holder named under **Regulation 4 CAR Duty to Manage Asbestos**.

The **Chief Executive Officer** ensures that the Trust leadership teams co-operate with Inspectas with regards the provision of information to enable risk assessment for presumed or known ACM's to be undertaken.

After a tendering exercise undertaken within 2016, the Trust have appointed Inspectas as their external competent organisation for matters relating to asbestos. Inspectas roles and responsibilities are defined below.

### 1.3.2 Appointed Professional Support and Advice - Inspectas

The Trust acknowledge that the duty holder's legal responsibilities cannot be delegated, however, it also recognises that professional support and advice is required. They have appointed Inspectas to undertake all works to support the Trust in complying with their duties as duty holders under **Regulation 4 CAR Duty to Manage Asbestos**.

Inspectas are responsible for the provision of information regarding the location and condition of ACM's throughout the property portfolio, and the updating and implementation of these Asbestos Management Procedures throughout the Trust.

They are responsible for ensuring that the identification and management of asbestos containing materials is carried out to enable the Trust to meet their requirements under this asbestos Management Plan, and Control of Asbestos Regulations 2012 CAR Regulation 4 including the following:

- Co-operating with the Trust leadership to undertake a suitable and sufficient assessment as to whether asbestos is, or is liable to be, present in the premises **Regulation 4 (3)**;
- To review the assessment forthwith if there is reason to suspect that the assessment is no longer valid **Regulation 4 (6) (a)** and there has been a significant change in the premises to which the assessment relates **Regulation 4 (6) (b)**;
- To ensure that the conclusions of the assessment and every review are recorded: **Regulation 4 (7)**

Where the assessment shows that asbestos is, or is liable to be, present in any part of a property he shall ensure that:

- A determination of the risk from that asbestos is made;
- A written plan identifying those parts of the premises concerned is prepared;
- The measures which are to be taken for managing the risk are specified in the written plan **Regulation 4 (8)**

# 1. Asbestos Policy Statement

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Managing the risk and preparing the management Plan shall include adequate measures for:

- Monitoring the condition of any asbestos or any substance containing or suspected of containing asbestos.
- Ensuring any asbestos or any such substance is properly maintained or where necessary safely removed.
- Ensuring that information about the location and condition of any asbestos or any such substance is:
  - provided to every person liable to disturb it
  - made available to the emergency services
- Ensuring that the plan and records are updated when ACM's are repaired or removed. **Regulation 4 (9)**

To ensure that the Plan is reviewed and revised at regular intervals and forthwith if:

- there is reason to believe the plan is no longer valid
- there has been a significant change in the premises to which the plan relates. **Regulation 4 (10) (a) (i) (ii)**

To ensure the measures specified in the plan are implemented and the measures taken to implement the plan are recorded **Regulation 4 (10) (b) (c)**

To ensure that information instruction and training is given to all employees who are likely to work with and/or disturb asbestos materials **Regulation 10 CAR.**

Responsible for the safe management of asbestos and presumed asbestos in their respective sites, premises.

### 1.3.3 The building management plans

The written plan shall specify whether any repair work or removal needs to be carried out on the ACM's identified, and provide the order of priority for ensuring this is implemented. Areas of high risk shall receive the earliest attention and strictest management.

The plan shall ensure that any asbestos that is left in place is adequately managed to ensure that its potential danger is tightly controlled and the risks kept to the minimum level. **Regulation 4 (9)**

## 2. Summary

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### 2.1 Current position and initial objectives

A review has been undertaken by Inspectas in conjunction with the Trust leadership team and based on the information that the Trust held.

New asbestos surveys have been undertaken by Inspectas in 2016, including the addition of site specific management plans.

An extensive remedial/removal programme was undertaken during summer 2017 at various sites actioning all items that were identified from the survey and management plan action plans as requiring remedial actions. Appendix 2 of this policy sets out the latest desk top review, showing the current position of the Trust portfolio.

It remains the policy of the Trust that if any areas throughout the portfolio is planned to undergo maintenance, repair or refurbishment, it will be surveyed **PRIOR** to any work being carried out. This will be a refurbishment survey in accordance with HSG 264.

Asbestos Registers will continue to be updated and available for the entire site in the form of hard copy and Inspectas online EMS system to show the location(s) of all known asbestos containing materials (ACM's), or presumed ACM's.

Where existing ACM's are in good condition and not subject to abrasion or disturbance, then they will be left undisturbed and their condition monitored through annual re-inspections.

***Where ACM's are damaged, deteriorating or inadequately sealed they will be either removed, repaired or encapsulated, whichever is the most practical way to prevent the release of asbestos fibres, and manage these materials.***

Adequate planning will be given to maintenance and refurbishment schemes in order to allow asbestos inspection and risk assessment programmes to be undertaken.

The Asbestos Register will be reviewed and regularly updated and a system of Asbestos Inspections implemented on a regular basis, depending upon the nature, type, location and condition of the ACM's.

Information contained in the Asbestos Register will be made available on request to all employees, and health and safety representatives and contractors as necessary. **The site-specific duty holders and responsible/competent persons** shall ensure that the Asbestos Register is readily available and brought to the attention of all contractors prior to the commencement of any building related works. This role may be diluted through other staff who have received the relevant level of training.

### 2.2 Managing asbestos in buildings

#### 2.2.1 Outline

The measures available to manage ACM's includes:

- Leaving the asbestos material in place, effectively seal (encapsulate or encase) and introduce a monitoring system;
- Removing and disposing of the asbestos material and reinstate where required using non-asbestos materials.

## 2. Summary

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Where ACM's have been identified, appropriate remedial measures will be carried out in accordance with the relevant regulations and guidance. If there is any uncertainty regarding ACM's within installations, it must be presumed that ACM's are present, unless there is strong evidence to prove otherwise.

Any works affecting ACM's are to be carried out using procedures, which safeguard contractors, employees, pupils and the public. The relevant regulations and guidance documents are to be followed when dealing with these materials.

### 2.3 Re-inspections

Asbestos materials should be inspected regularly depending upon to the material type, location, condition and the risk assessment score to check for damage or deterioration as this may alter the original risk assessment. The inspection period is normally 12 months for materials in good condition, but the inspection intervals will be increased for materials that are in poor condition or damaged, or in a location where they could be easily damaged.

### 2.4 Asbestos Register

The principal requirements for the Asbestos Register are:

- Keep and maintain an up to date record of the location, condition, maintenance and removal of all ACM's.
- Assist in the provision of information to anyone who is likely to disturb ACM's about the location and condition of the material.

Inspectas are responsible for ensuring that all up to date asbestos related information is used to update the management plan and asbestos register for each building/site, and current up to date plans and registers are provided to the Trust.

Updated surveys will be stored on Inspectas EMS online system and will be managed and updated by Inspectas.

Inspectas are responsible for ensuring that the asbestos management plan/asbestos building register is available at each building owned or managed by the Trust. This information must be provided to all employees and safety representatives.

**The site-specific duty holders and responsible/competent persons, must ensure that the Asbestos Registers are provided to any contractor or trades person in advance of any work being undertaken that may disturb ACM's. Evidence must be obtained that this information has been read and understood by the trade's person(s).**

### 2.5 Asbestos Surveys

In order to make an accurate assessment of the risks associated with asbestos it is necessary to have sufficient information to be able to locate, identify and assess the extent and condition of Asbestos Containing Materials (ACM's).

The Trust contracted Inspectas in 2016 to carry out new management surveys in line with relevant regulation and legislation.

These surveys were completed to all sites throughout the trust which were built pre 2000, and



## 2. Summary

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contained site specific management and action plans for all ACM's identified.

It remains the policy of the Trust, that prior to any work being carried out which penetrates the fabric of the building, or disturbs plant and equipment a refurbishment survey as described by HSG 264 'The Surveyors Guide' will be carried out to determine if any hidden asbestos containing materials are present.

All surveys will be carried out by Inspectas in line with the requirements of HSE guidance document HSG 264 The Surveyors Guide. Inspectas are recognised as holding UKAS accreditation to ISO 17020 (inspection purposes)

### 2.6 Risk assessments and action plan

A legal requirement to carry out a risk assessment for all work activities exists under the Management of Health and Safety at Work Regulations 1999. The requirement to assess the risk posed by asbestos is further enforced by the Control of Asbestos Regulations 2012. These regulations require that asbestos present in the workplace, must not present a hazard to health.

The risks from asbestos should be assessed and managed for all identified or presumed ACM's. The material assessment will establish the likelihood of the ACM releasing fibre into the air if disturbed.

The written plan shall specify any repair work or removal that needs to be carried out on the ACM's identified, and provide the order of priority for ensuring this is implemented. Areas of high risk shall receive the earliest attention and strictest management controls.

The asbestos management plan/register to be included within this policy document will provide details of the location, condition, and extent of all ACM's throughout the site along with actions and target dates for completion. This will identify the requirements for;

- Any restrictions around the ACM's
- Any further investigations/sampling
- Future Management/Inspections
- Any abatement works (encapsulate/removal)

The plan shall ensure that any asbestos that is left in place is adequately managed to ensure that its potential danger is tightly controlled and the risks kept to the minimum level.

### 2.7 Prevention of exposure, or release of asbestos fibres

The actions to be taken to prevent exposure or the release of asbestos fibres to air may include a combination of the following:

- Identification (through survey works)
- Encapsulation/encasement
- Management
- Training
- Controlled and managed abatement
- Control of contactors/sub-contractors

NOTE: Labelling is not to be adopted on ACM's to the Trust portfolio. It is felt that labels can

## 2. Summary

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fall off and contractors may wholly rely upon their presence to locate asbestos bearing material. The Trust believe that a more effective way of making parties aware of ACM's throughout the portfolio is through proper sharing of information to trained personnel through the individual site asbestos registers.

The communication of information held on the presence of ACM's or the presumed location of asbestos materials will be given to employees, in-house staff, and all contractors. Communication is achieved by implementing by the following:

- Training relevant personnel by an appropriate level
- Distribution of information prior to works being undertaken
- Copy of the asbestos register / survey report / and relevant asbestos procedures issued and signed by the trades involved.
- All Contractors and Sub-Contractors to have an appropriate level of training on asbestos, and carry evidence of this with them or provide prior to works.
- They will be provided with a copy of the asbestos register / survey report / and relevant asbestos procedures prior to works being undertaken and must sign the declaration sheets and return as part of Trust internal procedures

Instructions on restrictions to any areas containing asbestos or presumed to contain asbestos will be given prior to works commencing.

### 3. Training and Communication

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- 3.1 The Trust leadership teams will be adequately trained in accordance with regulation 10 of the Control of Asbestos Regulations 2012, and the approved code of practice and guidance document L143 (work with asbestos materials containing asbestos).

Training will be provided for employees who are likely to come into contact with ACM's and will be designed to provide them with suitable and sufficient level of information in accordance with regulation 10.

Duty to manage training will be provided for the following people:

- CEO, Headteachers, Heads of School
- Director of Finance, Business and Operations
- School Business Managers
- Competent persons for the Trust

Asbestos Awareness training will be provided for the following people:

- Premises Managers
- Trustee/School Governor designated with Health and Safety responsibility

Annual refresher training will be provided for all employees with a responsibility for the management of or those whose work may interface with asbestos.

It is a requirement that all Contractors undertaking any work will have received the appropriate level of asbestos training as defined by Regulation 10 of CAR 2012 and the ACoP L143. Inspectas are consulted for providing guidance on this and can provide the relevant level of training.

Contractors are made aware of the locations of asbestos containing materials (where information is available) and of their duties not to disturb these materials and to report any suspected new ACM's or any damage or deterioration to Inspectas.

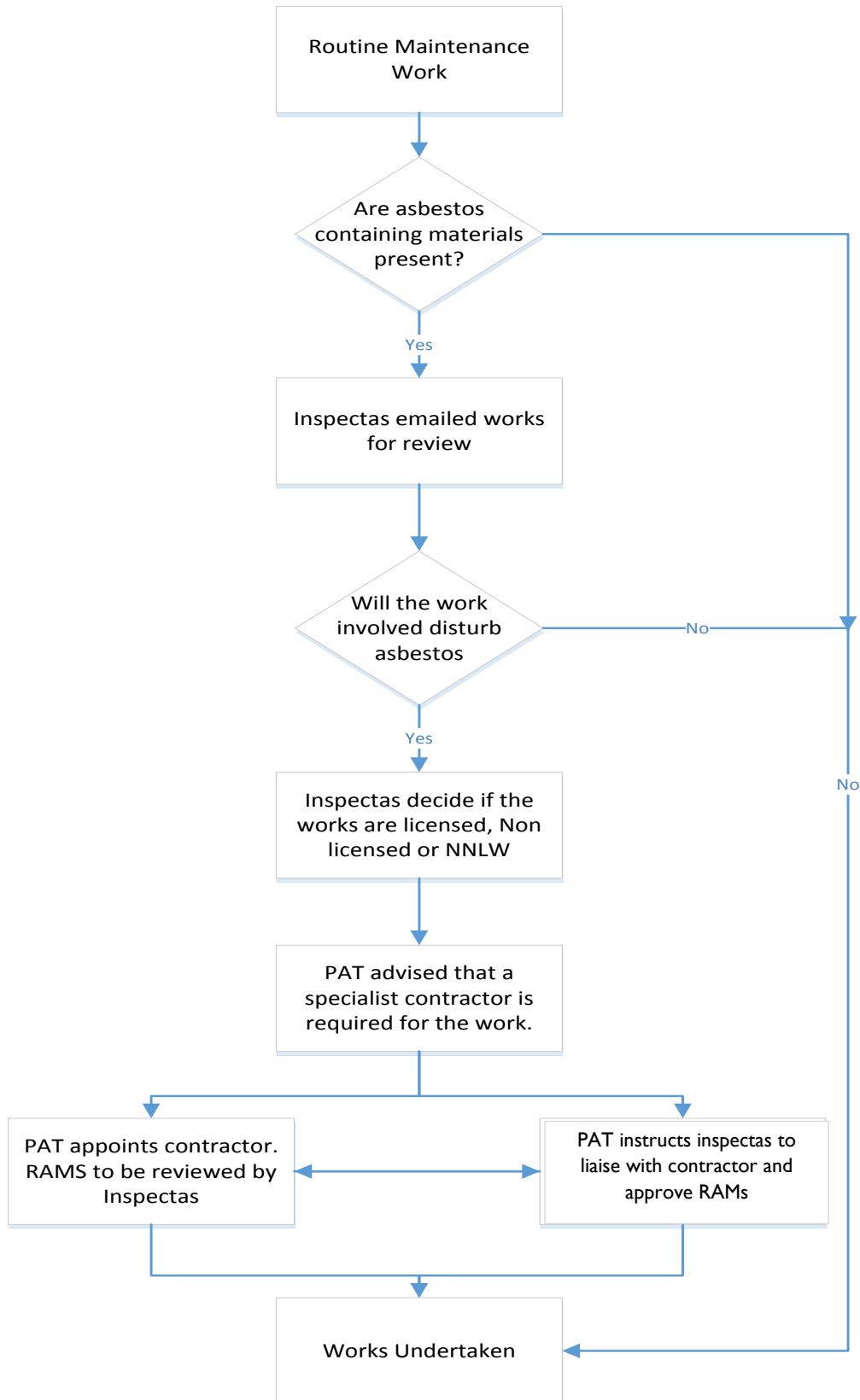
**Flowcharts have been devised (see below) for all refurbishment schemes and routine maintenance works which may be undertaken on a site.**

**These flowcharts have been designed specifically for the Pontefract Academy Trust in order to safeguard employees, in-house staff, contractors, public and pupils.**

**These procedural flowcharts should be followed for maintenance and refurbishment projects and will ensure the safeguarding of all of the above personnel.**

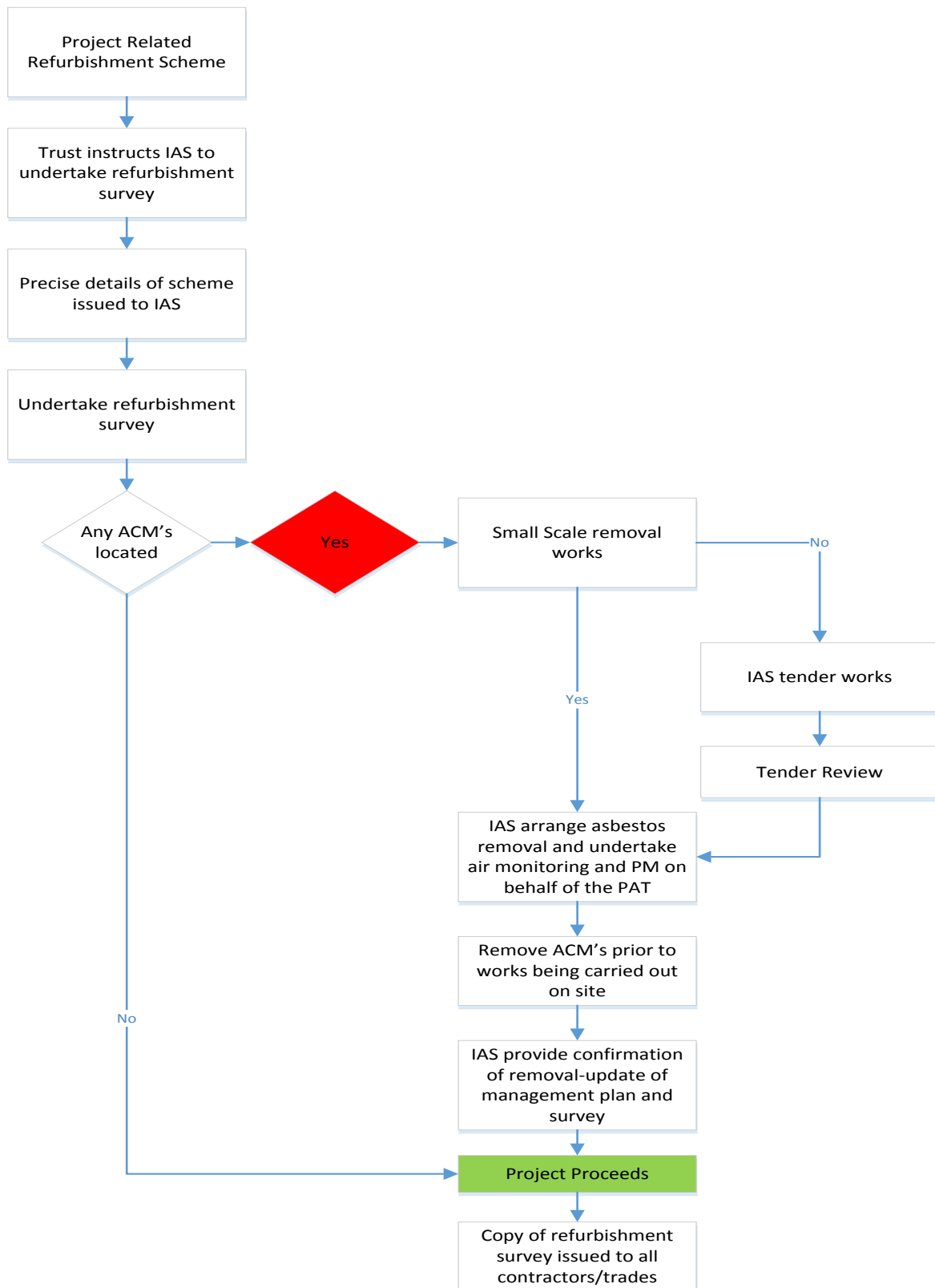
### 3. Training and Communication

#### 3.2 Routine Maintenance Procedure



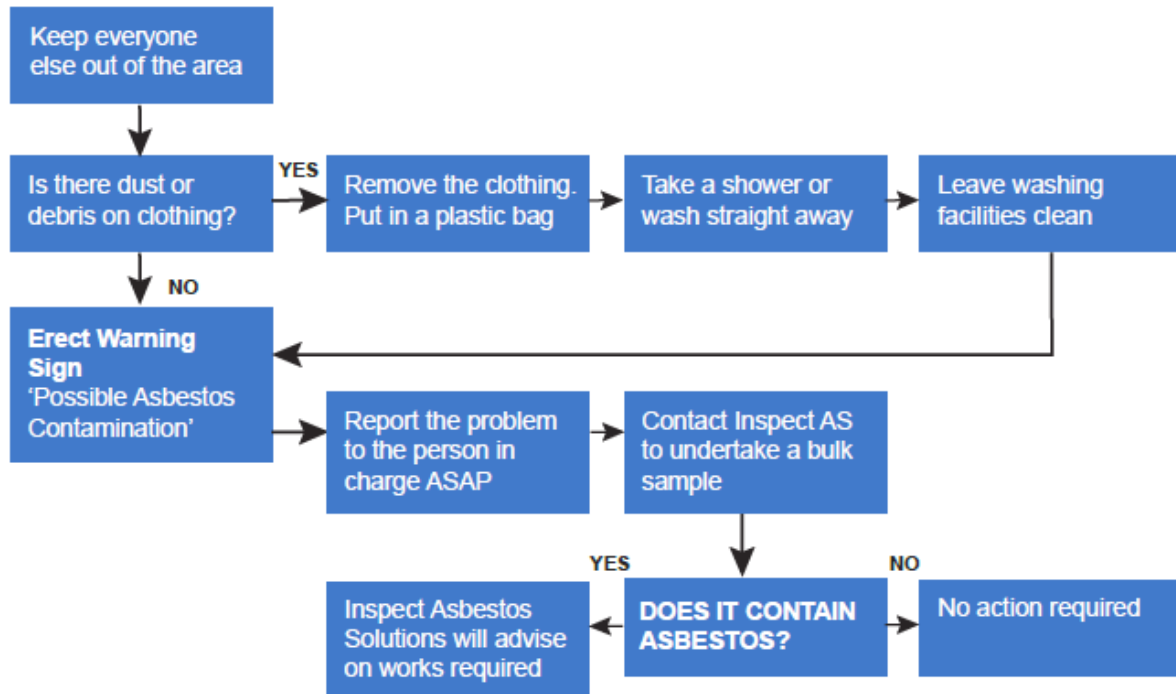
### 3. Training and Communication

#### 3.3 Routine Refurbishment Procedure



## 4. Emergency Procedures

In the event of damage to ACM's or suspected ACM's, or the accidental release of known asbestos fibres into the air, the following emergency procedure should be instigated immediately:



## 4. Emergency Procedures

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### **Stage 1 – Isolate the area**

- 1) Immediately clear the area of all persons;
- 2) If anyone has been potentially contaminated remove all contaminated clothing and leave within the contaminated area for disposal as contaminated waste;
- 3) Leave the area. Do not remove any potentially contaminated items including clothing, tools, equipment etc from the area;
- 4) Isolate area if possible - (e.g. if in a single room);
- 5) Prohibit access to area and secure the area. (Barrier tape off, & signage etc);
- 6) Turn off any ventilation systems in the area eg Air Conditioning units, extractors etc. unless to do so, you would need to re-enter area);
- 7) Inform Inspectas.

### **Stage 2 make safe**

- 8) Inspectas Assesses the incident, and instructs a licenced removal contractor to clean up the area of contamination and repair / seal the damaged materials;
- 9) Inspectas shall take bulk samples of the debris and damaged material analysis of which shall be included in the investigation;
- 10) Inspectas will undertake air testing of the area following the incident and for an inspection by the analyst that the area is free from debris, the underlying materials have been made safe and the area is for re-occupation.

## 4. Emergency Procedures

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### **Stage 3 Investigate & action plan**

- 11) Inspectas assesses the incident and collates the following information:
  - Type of material disturbed
  - Location and amount of material
  - Details of how the damage occurred
  - Actions taken by who and when
  
- 12) Inspectas will give specialist guidance / technical support / and assist with the investigation as required;
  
- 13) Initiate appropriate agreed actions to resolve the incident
  
- 14) Compile a report on the conclusion of the incident.
  
- 15) Update the asbestos management plan

Contact telephone numbers in the event of asbestos being inadvertently disturbed are given in Appendix 1.

Should any member of staff consider that they have been inadvertently exposed to asbestos they shall immediately notify the Trust who will contact Inspectas immediately. Details of the exposure will be recorded in the employees Personnel File.

### **Emergency services**

The Duty Holder should inform the emergency services, (Fire Service), to provide them with information they may require in relation to retained ACM's, and the format eg register/plans.



## 5. Policy Implementation

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Evidence of implementation of this policy will be:

- Training to relevant staff has been provided
- Updated surveys of all sites as defined by the desk top study
- Action plans implemented (ongoing)
- Planned maintenance implemented to prevent disturbance of ACM's
- All asbestos materials re-inspected
- Policy reviewed annually

## Appendix 1: Contact Details

Contact Details:		
Trust Duty Holder	Julie Craig Chief Executive Officer	E: jcraig@patrust.org.uk P: 01977 707337
Trust Responsible Person	D Samwell Director of Finance, Business and Operations	E: dsamwell@patrust.org.uk P: 01977 707337
Competent person #1	Ian Corbett	E: icorbett@kings.wakefield.sch.uk P: 01977 601753 M: 07740 110143
Competent person #2	Frankie Pons	E: fpons@carleton.wakefield.sch.uk P: 01977 781555 M: 07717 454969
Inspectas	Matthew Fahy	E: matthew@inspectas.co.uk P: 0844 264 0094 M: 07429158959
Carleton Community High School		
Site Duty Holder	Hellen Bolton Headteacher	E: TBC each site P:
Responsible Person	Helen Grandfield School Business Manager	E: TBC each site P:
Carleton Park J&I School		
Site Duty Holder	Rebecca Rowett Headteacher	E: TBC each site P:
Responsible Person	Rachel Kaye School Business Manager	E: TBC each site P:
Halfpenny Lane JI&N School		
Site Duty Holder	James Parkinson Head of School	E: TBC each site P:
Responsible Person	Stephanie Mcloughlin School Business Manager	E: TBC each site P:
Larks Hill J&I School		
Site Duty Holder	Rebecca Rowett Headteacher	E: TBC each site P:
Responsible Person	Rachel Kaye School Business Manager	E: TBC each site P:
Orchard Head JI&N School		
Site Duty Holder	Jo Vickers Head of School	E: TBC each site P:

## Appendix 1: Contact Details

Contact Details:		
Responsible Person	Paul Seaton School Business Manager	E: TBC each site P:
The King's School		
Site Duty Holder	Elaine Briggs Head of School	E: TBC each site P:
Responsible Person	Karen Josse School Business Manager	E: TBC each site P:
The Rookeries J&I School		
Site Duty Holder	Nikki Ellwand Head of School	E: TBC each site P:
Responsible Person	Julie Hartley School Business Manager	E: TBC each site P:
Emergency Contact	Inspectas	E: info@inspectas.co.uk P: 0844 264 0094 M: 07429158959

## Appendix 2: Desk Top Review Including Action Plan

Site	Current Position	Action Plan	Timescale	Completed?
Carleton Community High	Management survey and management plan implemented October 2016  Low risk asbestos abatement works undertaken and completed licensed works for summer 2017  Ongoing dispute with Spectra to be resolved by February 2018	Spectra to rectify ongoing dispute – April 2017  Annual re-inspection	12 Months	No – part of rectification works – February 2018
Carleton Park	Management survey and management plan implemented October 2016.  Asbestos abatement works undertaken 2016/2017 and all products are now adequately managed	Annual re-inspection	12 Months	Yes
Halfpenny Lane	Management survey and management plan implemented October 2017	No actions required	R/D Surveys when required	
Larks Hill	Management survey and management plan implemented October 2016.  Asbestos abatement works undertaken 2016/2017 and all products are now adequately managed	Annual re-inspection	12 Months	Yes
Orchard Head	Management survey and management plan implemented October 2016.  Asbestos abatement works undertaken 2016/2017 and all products are now adequately managed	Annual re-inspection	12 Months	Yes
The King's	Management survey and management plan implemented October 2016.  Asbestos abatement works undertaken 2016/2017 and all products are now adequately managed	Annual re-inspection	12 Months	Yes
The Rookeries Carleton	Management survey and management plan implemented October 2016.  Asbestos abatement works undertaken 2016/2017 and all products are now adequately managed	Annual re-inspection	12 Months	Yes
De Lacy Primary School	No Asbestos Works required – Built 2013			

