



PONTEFRACT
ACADEMIES TRUST

Asbestos Management Policy and Plan

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1. Asbestos Policy Statement

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 Ponfracr 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 sets out the procedures we have put in place to protect our employees/pupils/students who occupy our premises for their normal day-to-day activities; our contractors engaged in maintenance, repair or refurbishment work; and our 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. 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 Trustees has overall responsibility for managing the risks from asbestos across the property portfolio and are the main Duty Holder under Regulation 4 CAR 2012 ***Duty to Manage Asbestos***.

The duty placed on the Trustees to manage asbestos in Trust premises is implemented through the management structure, with the full professional advice and support from Inspectas Compliance Ltd. All school leadership teams, employees, and contractors operating in Trust premises must co-operate with Inspectas to allow the Trustees to comply with their duties set out in 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 of injury from exposure to asbestos.



Phil Jones

Chair of the Trust Board

Date: 28 January 2019

1. Asbestos Policy Statement

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 will 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

1.3 Responsibilities for Asbestos Management

1.3.1 Duty Holder

The **Chief Executive Officer (CEO)** is the senior executive leader of the Trust with personal responsibility for the financial resources under the Trust's control and is therefore the main named duty holder named under **Regulation 4 CAR Duty to Manage Asbestos**.

The **CEO** will ensure 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.

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 Trustees acknowledge that the Duty Holder's legal responsibilities cannot be delegated, however, they also recognise that professional support and advice is required. They have appointed Inspectas to undertake all works to support the Trust and in supporting Trustees 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

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 Position and Procedures

2.1 Current position and initial objectives

A review was undertaken by Inspectas based on the information that the Trust held.

A remedial/removal programme was undertaken during summer 2018 in order to facilitate major refurbishment and upgrade schemes at various sites. The removal works were undertaken in order to safeguard contractors during refurbishment and prevent any exposure during the refurbishment. Appendix 2 of this policy sets out the latest desk top review, showing the current position of the Trust portfolio and confirms that whilst 7 of the Trust's 8 properties continue to contain asbestos, they are now all in a position where it is well managed (ie encapsulated and controlled). Ongoing reviews will continue to be undertaken annually for any deterioration in encapsulation. All premises and business managers have up to date training in asbestos management and the operation of the policy and procedures.

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 Electronic Management System (EMS) 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.

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.

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.

2. Summary Position and Procedures

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

2.3 Re-inspections

Asbestos materials will 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 will 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 will 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 will 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).

Management surveys are available at all sites, including management plans and are in line with relevant regulation and legislation.

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

2. Summary Position and Procedures

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 will 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 will 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 will receive the earliest attention and strictest management controls.

The asbestos management plan/register 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 will 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 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 and all contractors. Communication is achieved by implementing by the following:

2. Summary Position and Procedures

- 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

- 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 or in place for the following people:

- Heads of School
- Director of Finance, Business and Operations
- Trust Estates Manager (H&SW Competent Person)
- School Business Managers
- Competent person

Asbestos Awareness training will be provided for the following people:

- Premises Managers

Refresher training will be provided for all employees with a responsibility for the management of or those whose work may interface with asbestos. This will be undertaken by the Trust H&SW Competent Person who will be appropriately trained in advance.

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.

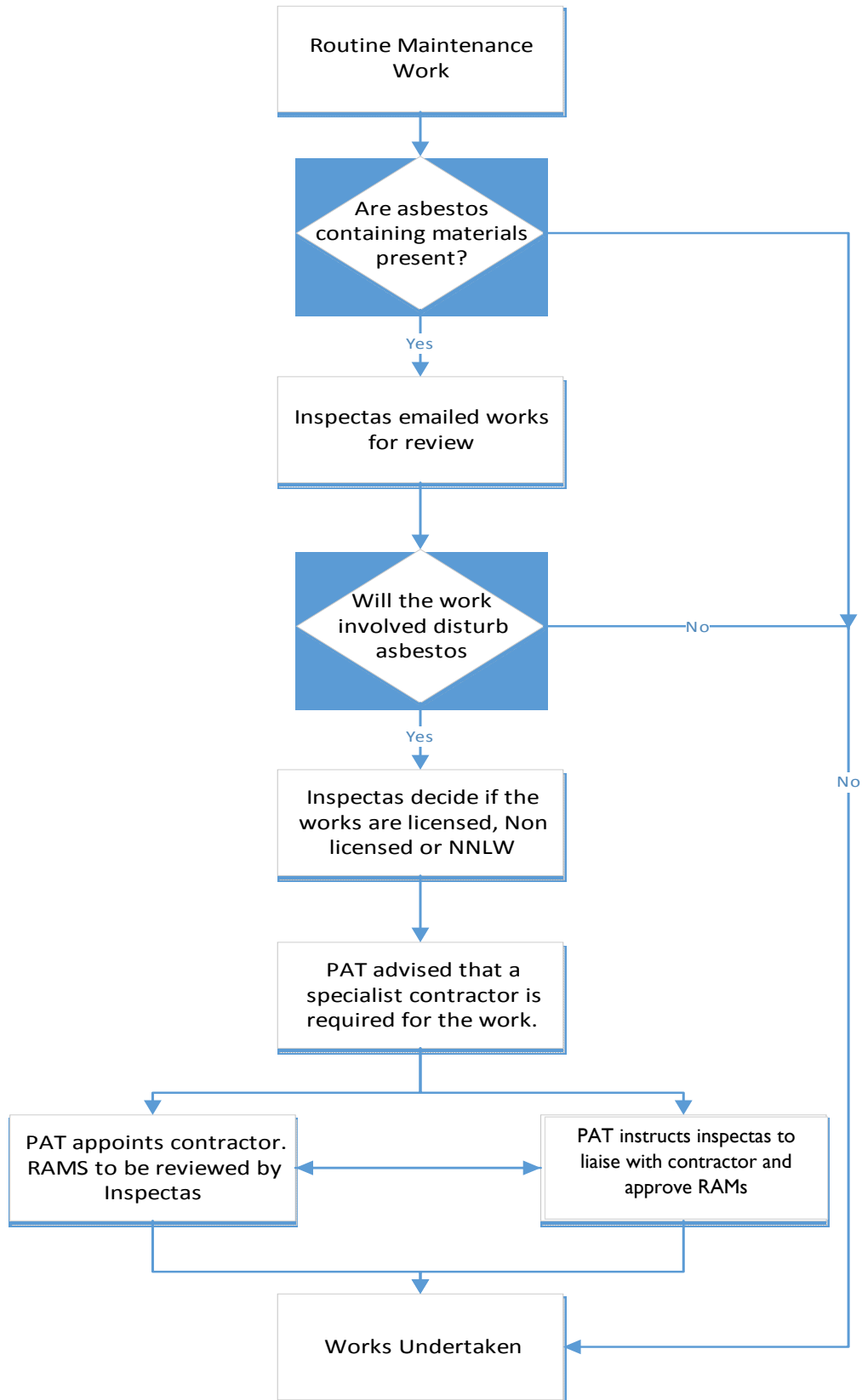
Flowcharts have been devised (see below) for all refurbishment schemes and routine maintenance works which may be undertaken on a site.

These flowcharts have been designed specifically for the Pontrfract 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.

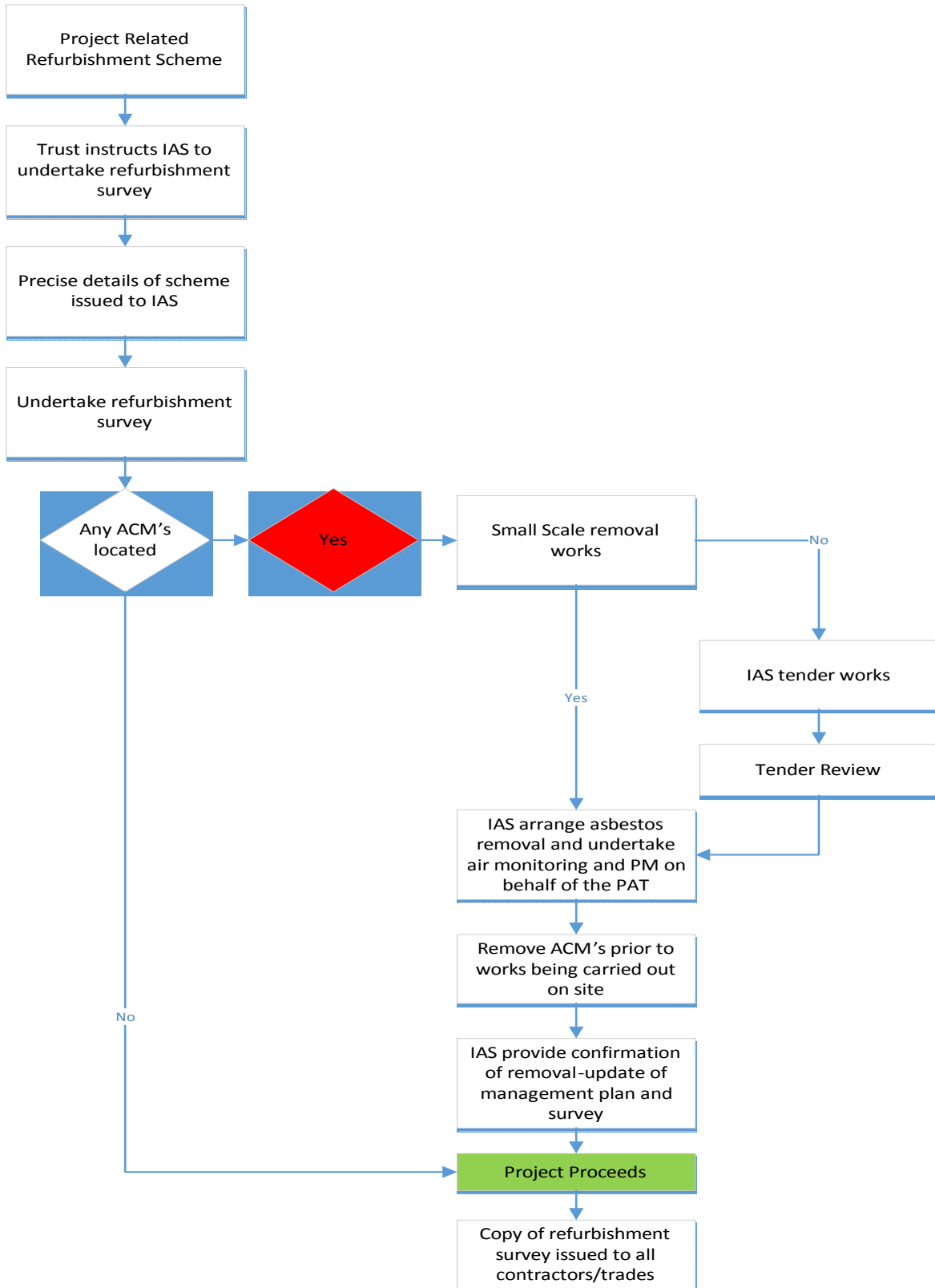
3. Training and Communication

3.2 Routine Maintenance Procedure



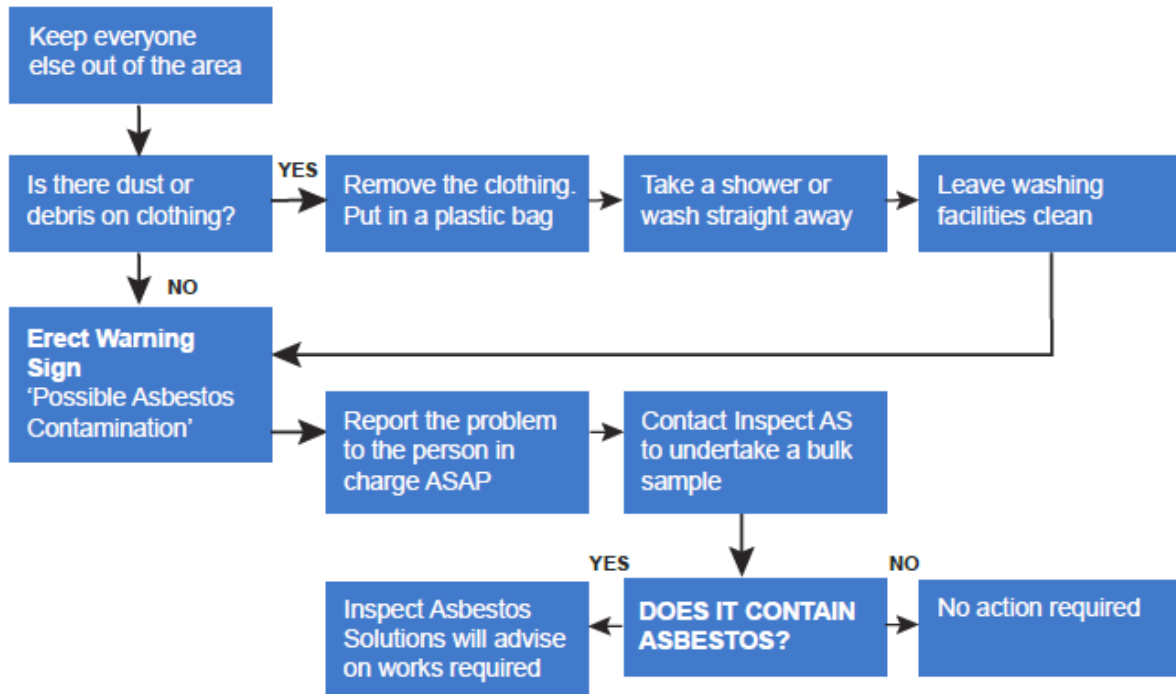
3. Training and Communication

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

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.

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.

4. Emergency Procedures

Emergency Services

The H&S Competent Person and or Site Duty Holder will 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

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

Asbestos Professional Advisor Contact Details

Inspectas	Matthew Fahy	E:matthew@inspectas.co.uk P:0844 264 0094 M: 07429158959
Emergency Contact	Inspectas	E: info@inspectas.co.uk P: 0844 264 0094 M: 07429158959

Trust Named Responsible Officers

Trust Named Duty Holder	Julian Appleyard, Chief Executive Officer
Trust Responsible Person	D Samwell, Director of Finance, Business and Operations
Trust Designated H&SW Competent Person	Ian Corbett, Trust Estates Manager
Carleton High School	
Site Duty Holder	Jo Cross, Head of School
Responsible Person	Helen Grandfield, School Business Manager
Carleton Park J&I School	
Site Duty Holder	Joe Ayre, Head of School
Responsible Person	Rachel Kaye, School Business Manager
Halfpenny Lane JI&N School	
Site Duty Holder	James Parkinson, Head of School
Responsible Person	Stephanie Mcloughlin, School Business Manager
Larks Hill J&I School	
Site Duty Holder	Ian Shuttleworth, Head of School
Responsible Person	Rachel Kaye, School Business Manager
Orchard Head JI&N School	
Site Duty Holder	Joe Mitchell, Head of School
Responsible Person	Paul Seaton, School Business Manager
The King's School	
Site Duty Holder	Elaine Briggs, Head of School
Responsible Person	Karen Josse, School Business Manager
The Rookeries JI&N School	
Site Duty Holder	Nikki Ellwand, Head of School
Responsible Person	Julie Hartley, School Business Manager

Appendix 2 - Desk Top Review

Site	Current Position	Action Plan	Timescale	Completed (Yes/No)
Carleton High School	Management survey and management plan in place	Annual re-inspection	12 Months	Yes
Carleton Park J&I School	Management survey and management plan in place	Annual re-inspection	12 Months	Yes
Halfpenny Lane JI&N School	Management survey and management plan in place	No actions required	R/D Surveys when required	
Larks Hill J&I School	Management survey and management plan in place	Annual re-inspection	12 Months	Yes
Orchard Head JI&N School	Management survey and management plan in place	Annual re-inspection	12 Months	Yes
The King's School	Management survey and management plan in place	Annual re-inspection	12 Months	Yes
The Rookeries JI&N School	Management survey and management plan in place	Annual re-inspection	12 Months	Yes
De Lacy Primary School	No Asbestos Works required – Built 2013	No actions required		