



Fylde Coast Academy Trust
(FCAT)

Asbestos Management Plan
2016-2019



Introduction

Fylde Coast Academy Trust (FCAT) is the owner and controller of premises and is aware of its legal duties owed to staff, students, building occupiers, contractors and others with regards to the provision of safety related information on asbestos and its duty to manage asbestos within its premises.

Objectives

It is the ultimate long term aim of FCAT is to sustain a fully asbestos safe working environment. In the interim, the academy has a structured, risk based approach to the management and control of asbestos containing materials (ACMs) within its property portfolio to reduce the risk to its lowest practical level. This includes the use of licensed and accredited specialists, planned surveys and re-inspections and maintenance of comprehensive records.

FCAT recognises the hazard of asbestos and the risks to health that it poses. Therefore to fulfil its moral, social and legal obligations this plan has been developed. Its effective implementation will minimize the risk of exposure to asbestos.

Asbestos is assessed for condition status on a regular basis. Asbestos that is identified as being in a poor condition or in a high risk area e.g. exposed boards within high activity public access and/or circulation spaces will also be give immediate priority for treatment.

This document provides information, procedures and guidance relevant to the management and control of asbestos containing materials known or presumed to be present with the buildings for which the Lead Site Supervisor is the Duty-holder.

FCAT has, by survey, identified asbestos-containing materials as being present at certain sites.. The plan must be read in conjunction with the asbestos survey report for each site which records any asbestos containing or suspected asbestos material known to be present.

To enable the duty-holder to discharge this responsibility this document describes the requirements and procedures for dealing with asbestos.

Any asbestos-related issues associated with FCAT property, including the removal, encapsulation, transport, and disposal or otherwise potential disturbance of asbestos materials, shall be performed in accordance with all relevant Acts, Regulations, advisory standards, Approved Codes of Practice and industry standards, including, but not limited to, the following:

- The Health and Safety at Work etc. Act 1974
- The Control of Asbestos Regulations 2012
- The Management of Health and Safety at Work Regulations 1999 (as amended)
- The Hazardous Waste Regulations 2005
- The Site Waste Management Regulations 2008
- The Construction (Design and Management) Regulations 2007

Roles and Responsibilities*

Duty-holder	Responsibility
Fylde Coast Academy Trust (FCAT)	<ul style="list-style-type: none"> • Organisational Commitment to promoting a healthy and safe working environment.
Head Of Estates FCAT	<ul style="list-style-type: none"> • Overall responsibility for the overall strategic asbestos management including procedures and practices • Ensuring development and implementation of the AMP • Evaluate on an annual basis, or more frequently as required, the need to hold refresher training for any recently employed FCAT staff (including agency and contract staff under direct control) whose job requires them to manage and/or work near known or suspect ACMs • Commission or otherwise provide awareness and/or procedural training for all FCAT staff (including agency and contract staff under direct control) whose job requires them to manage and/or work near known or suspect ACMs • Commission or otherwise complete a detailed and comprehensive asbestos register and Plan for all buildings suspected of containing ACMs. Include within this scope any future acquisitions. • Commission or otherwise complete a regular review and evaluation of all ACMs once per year or more frequently as circumstances and assessments warrant. • Provide final approval for all “asbestos work requisitions” forwarded for his/her attention. • Monitor the implementation of the AMP • Carry out an annual review of the AMP to critically review all management processes and their effectiveness as well as the over-all progress made against the implementation action plan.
Lead Site Supervisor	<ul style="list-style-type: none"> • The day-to-day administration and maintenance of the Asbestos Management programme • Maintenance of the Asbestos Register and all other relevant information pertaining to the control and management of asbestos. • Co-ordinate the response to any report of suspect asbestos containing building materials, asbestos debris, damage or disturbance. This will include evaluation of circumstances under which it has been encountered and initiating the necessary sampling, clean-up, removal or repair • Appropriate liaising with the Head of Estates (and/or their appointed asbestos specialist) who will be responsible for final approval. • Advise managers or project managers on the retrieval and evaluation of EAR (Electronic Asbestos Register) information connected to any maintenance, renovation or construction activities that they are planning to undertake. Monitor asbestos work instructions/method statements to ensure the individual manager or project manager in charge of the work has

	<p>followed the AMP and allow for update of the EAR.</p> <ul style="list-style-type: none"> • Ensure that the Asbestos Register • Ensure a copy of all site inspection reports and corresponding air monitoring data is made available to whosoever wishes to inspect such reports. • Arrange for all original survey data/information and any subsequent asbestos survey data/information or updates to be loaded onto the EAR and make them available upon request for viewing by whosoever wishes to inspect them.
Contractors/Directly Employed Labour (DEL)/All Employees of FCAT.	<ul style="list-style-type: none"> • Ensuring that any works that may disturb or damage ACMs are avoided. • Reporting to the Head of estates / Lead Site Supervisor any material suspected to contain asbestos where the material has been damaged or disturbed. Refer to the AMP for procedures to follow with regard to the management or removal of ACMs.
Licensed Asbestos Removal Contractor (LARC)	<ul style="list-style-type: none"> • Complying with current legislation and HSE Approved Code Of Practices and guidance • Removal and/or encapsulation of ACMs in a safe and controlled manner without increasing risk of exposure to asbestos fibre to staff, students and visitors etc. • Attend site, as directed by the Head of Estates / Lead Site Supervisor, or other competent persons, for the making safe of any uncontrolled disturbances of ACMs • Providing assistance to the Asbestos Consultant or other competent persons, in the undertaking of Refurbishment/demolition asbestos surveys as necessary.
FCAT Lead Health and Safety	<ul style="list-style-type: none"> • Liaise with Duty holders above as necessary • Monitor/audit the effectiveness of the AMP

*(where there is more than one such duty-holder, the relative contribution to be made by each such person in complying with the requirements of this regulation will be determined by the nature and extent of the maintenance and repair obligation owed by that person." CAR 2012 regulation 4)

Surveys

A **Management Survey** is for the purpose of managing asbestos-containing materials during the normal occupation and use of premises.

A Management Survey aims to ensure that:

- Nobody is harmed by the continuing presence of asbestos containing materials in the premises or equipment;
- That the asbestos containing materials remain in good condition; and
- That nobody disturbs it accidentally
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The Survey must locate ACM that could be damaged or disturbed by normal activities, by foreseeable maintenance, or by installing new equipment. It involves minor intrusion and minor asbestos disturbance to make a Materials Assessment (which shows the ability of ACM, if disturbed, to release fibres into the air). It guides the client, for example in prioritising any remedial work. The duty holder must provide the surveyor with the site layout, building plans, building specifications or architect's drawings, and any history of asbestos work; point out site hazards, including means of safe access to heights and provide keys, etc.

A **Refurbishment Survey** is required where the premises, or part of it, need upgrading or, refurbishment (See CAR reg. 5). In addition to normally accessible ACM, there is likely to be ACM that are concealed in the fabric of the building and would not have been identified in a management survey. CAR Regulation 5 requires that “*an employer shall not undertake work in [demolition,] maintenance, or any other work which exposes or is liable to expose his employees to asbestos in respect of any premises unless he has carried out a suitable and sufficient assessment as to whether asbestos, what type of asbestos, contained in what material and in what condition is present or is liable to be present in those premises*”.

A refurbishment survey aims to ensure that:

- Nobody will be harmed by work on asbestos-containing materials in the premises or equipment;
- Where it is foreseeable that ACM is likely to be disturbed during the refurbishment or installation works, they can be safely removed from the work area as far as reasonably practicable prior to works. Such work will be done by the right contractor in the right way.

The duty-holder must ensure that whenever possible there is an on-site pre-start meeting with the asbestos surveyor to agree the exact scope of the refurbishment or installation works and therefore the exact scope of the survey that will be required.

A **Demolition Survey** is required where the premises, or part of it, are scheduled for demolition (see CAR reg. 5). In addition to normally accessible ACM, there is likely to be ACM that are concealed in the fabric of the building and would not have been identified in a management survey. CAR Regulation 5 requires that “*an employer shall not undertake work in demolition, [maintenance, or any other work] which exposes or is liable to expose his employees to asbestos in respect of any premises unless he has carried out a suitable and sufficient assessment as to whether asbestos, what type of asbestos, contained in what material and in what condition is present or is liable to be present in those premises.*”

A demolition survey aims to ensure that:

- No-one will be harmed by work on ACMs in the premises or equipment;
- All ACMs can be safely removed from the building as far as reasonably practicable prior to demolition.
- Such work will be done by the right contractor in the right way.
- The duty-holder must ensure that whenever possible there is an on-site pre-start meeting with the asbestos surveyor to agree the exact scope of the refurbishment works and therefore the exact scope of the survey that will be required.

Risk Assessment

The material assessment is an assessment of the condition of the ACM, or the presumed ACM and the likelihood of its releasing fibres in the event of it being disturbed in some way. The material assessment (above) identifies the high-risk materials, i.e. those that will most readily release airborne fibres if disturbed. It does not automatically follow that those materials assigned the highest score in the material assessment will be materials that should be given priority for remedial action. Management priority must be determined by carrying out a risk assessment that will take into account factors such as: Maintenance activity; Occupant activity; Likelihood of disturbance; Human exposure potential;

The risk assessment for an ACM is the total of the two figures determined by the material assessment and the priority assessment. The algorithm score leading to a possible maximum score of 24. The priority assessment looks at the likelihood of someone disturbing the ACM.

The risk assessment can only be carried out with detailed knowledge of the above. Although a surveyor may have some of the information which will contribute to the risk assessment and may be part of an assessment team the duty-holders under CAR are required to make the risk assessment, using the information given in the survey report and their detailed knowledge of the activities carried out within the premises. The risk assessment will form the basis of the management plan, so it is important that it is accurate. Decisions on the actions deemed necessary will be assisted by the results from the risk assessment that is the combination of the material assessment and the priority assessment as outlined above. These scores can be broken down into categories with actions appropriate to each category detailed

Scale of Risk**HIGH RISK MATERIAL REQUIRING URGENT ATTENTION = Score 18 or more**

The potential hazard arising from this category warrants urgent attention. Immediate plans for consultation with the Asbestos Consultant and the Compliance Team should be made for the remediation of the asbestos containing material, appropriate action to be agreed according to location and condition. The option chosen for remediation will follow the hierarchy of control. In most cases it shall be necessary to prevent access or occupation until remediation has been agreed and completed.

MEDIUM RISK MATERIAL REQUIRING PROGRAMMED REMOVAL WITHIN A SPECIFIED TIMESCALE/INSPECTION = Score 14 to 17

This category indicates that deterioration in any of the contributory factors may result in asbestos fibre release. Therefore all asbestos, within this category, would typically warrant remediation on a programmed basis usually within a specified time scale, appropriate action to be agreed with the Compliance Team according to location and condition. The option chosen for remediation will follow the hierarchy of control.

LOW RISK MATERIAL REQUIRING REGULAR INSPECTION/REMOVAL AS PART OF REFURBISHMENT AND DEMOLITION PROJECTS = Score 9 to 13

This category indicates the need for regular monitoring as situations within this category do not pose an imminent risk to health and likelihood of fibre release is low under existing conditions but, this risk may rapidly alter should any number of factors contribute to the materials deterioration. It is recommended that ACMs falling into this category is visually inspected on an annual basis to ascertain any change in condition and if any does, it can be promptly subject to control actions to prevent and increase in exposure and uncontrolled fibre release and a reclassification to the above category. Approved warning labels (A Labels) should be positioned to help to prevent accidental damage to the material. Any remedial action identified through reclassification to a higher category is to be agreed with the Compliance Team according to location and condition. The option chosen for remediation will follow the hierarchy of control.

VERY LOW RISK MATERIAL REQUIRING ANNUAL INSPECTION/REMOVAL AS PART OF REFURBISHMENT AND DEMOLITION PROJECTS = Score less than or equal to 8

This category indicates low priority. ACMs within this category should be subject to annual visual inspection to ascertain any change in condition or when usage of the area changes. Where such a change occurs, prioritisation to a higher risk category may be necessary. Approved warning labels (A Label) should be positioned to help to prevent accidental damage to the material.

NONE 0 points No Action Necessary

Asbestos Register

The asbestos register forms an up to date record of all ACMs within any given location or property within an Academy. Where ACMs have been removed details of the removal will be clearly recorded. The register will contain information about materials that are suspected or presumed to contain asbestos but that have not been accessed or sampled for confirmatory analysis. Any areas or items not accessed will be recorded and presumed to contain asbestos unless there is strong evidence to prove otherwise.

The survey results will also be transposed onto an electronic database. The Lead Site Supervisor will update the register based on investigation and remedial works carried out and the production of the associated certificates.

Regular audits will be undertaken to ensure the register is kept up to date. The audit will comprise a walk through visual re-inspection by either the lead site Supervisor, or other nominated, suitably trained, competent personnel on site or by the approved consultant. The audit frequency will depend on the type and condition of the ACMs but will not be less than an annual inspection.

4.4.2 The Lead Site Supervisor will ensure that the register indicates the audit frequency. The audit frequency will be agreed between the Head of estates and Lead Health and Safety.

ASBESTOS MANAGEMENT

Introduction This asbestos management plan for ACMs within the Academy Site will identify steps needed to be taken to ensure the continued safe occupation and operation of premises.

The general principles of the asbestos management strategy at an Academy are as follows:

1. Confirm what is already known about The ACM's and how the Academy manages them.
2. Prevent Work at the Academy that may disturb the fabric of the building until Risk Measures have been implemented.
3. Carry out initial inspection for damage and disturbance of materials and take action to control these.
4. Develop Strategy for compliance
5. Carry out Risk Assessment of ACM's in situ to set priorities for managing them.
6. Develop long term Management Plan
7. Monitor and review the plan.

Record Keeping

Academy Academy Estates Department shall maintain detailed records of all activities and work permits relating to asbestos works, which have been undertaken.

The records kept shall include:

- All records marked with a (*) must be retained for a minimum of 40 years
- copies of all asbestos survey reports, including updates and amendments;*
- copies of all 'permit to work' documents;
- site induction records pertaining to the informing of contractors about the presence of asbestos on site, and that such contractors have been appropriately trained in safe work procedures and practices;
- Records pertaining to the informing of FCAT about the presence of asbestos on site, and that such employees have been appropriately trained in safe work procedures and practices;
- Records of any asbestos abatement works performed on site; *
- Clearance certificates indicating areas are safe to reoccupy after asbestos abatement works;*
- Records of management plan reviews. Asbestos Fibre air monitoring results*

Accident and near miss records will be maintained

Monitoring and Review

Monitoring through re-inspections of asbestos materials remaining on site will be conducted by a suitably qualified and competent person. Such re-inspections will comprise a visual assessment of the condition of the materials to determine whether the material remains in a satisfactory condition, or if deterioration has occurred since the previous inspection. Such re-inspections will determine if any remedial action, such as encapsulation, isolation or removal of the asbestos materials, is required. Re-inspections will be performed depending on risk assessment but no longer than a year.

The asbestos register, where necessary, will be updated and re-issued at the completion of the re-inspection work. It is required that the asbestos register is updated every time control actions undertaken. This will necessitate the use of the Asbestos consultant, or other competent persons and the material assessment or priority assessment may differ following management actions. All the supporting documentation for control actions should be kept with the asbestos register, or at the very least, the location of supporting documentation be cross-referenced within the register.

An inspection register to complement the asbestos register will be kept to ensure materials are re-inspected at the appropriate frequency (at least annually). Audits of re-inspection reports and the maintenance of the asbestos register will be undertaken at random intervals by FCAT Health and Safety Lead.

The register and procedures will be subject to an annual review to take into account changes in legislation, codes of practice and also experience within the Estate over the previous twelve months again by the Health and Safety Lead for FCAT.

The Asbestos Management Plan will additionally be subject to review at periods not exceeding twelve months or when there is a change in asbestos management, staff, or legislation.

The review shall critically review all the management processes and their effectiveness.

Information, Instruction and Training

Current regulations require that the employer provides training to all employees whose jobs require them to work on or near asbestos-containing materials or may have occasion to respond to instances of damaged asbestos. To satisfy this requirement the Academy and Head of Estates shall provide or arrange for awareness and procedural training for all employees who may have occasion to work near asbestos. In addition, comprehensive training must be provided to any supervisory staff responsible for overseeing or co-ordinating such works. In each case, the training shall be individually tailored to address specific needs of each group being trained and shall be based on site conditions as they exist at the time, all training is mandatory. Information, instruction and training will include:

Asbestos Awareness – background to what asbestos is, what ill effects can result from airborne exposure, what it has been used for and where it is likely to be found in the premises and Management, control standards and procedures.

Refresher training will be undertaken, if review does not indicate otherwise, at the following intervals:

1. Asbestos awareness – annually
2. Asbestos awareness for managers and project managers – every 3 years.

CONTROL METHODS

Determination of appropriate control method for asbestos

Appropriate when	Not Appropriate when	Advantages	Dis-advantages
DEFER			
<ul style="list-style-type: none"> • Negligible risk of exposure and • Asbestos inaccessible and fully contained • Asbestos stable and liable to damage 	<ul style="list-style-type: none"> • Possibility of deterioration or damage • Airborne asbestos dust exceeds recommender exposure level 	<ul style="list-style-type: none"> • No initial cost • Cost of removal deferred 	<ul style="list-style-type: none"> • Hazard remains • Need for continuing assessment • Asbestos Management programme required
ENCAPSULATE OR SEAL			
<ul style="list-style-type: none"> • Removal difficult or not feasible • Firm bond to substrate • Damage unlikely • Short life of structure • Readily visible for regular assessment 	<ul style="list-style-type: none"> • Asbestos deteriorating • Application of sealant may cause damage to material • Water damage likely • Large areas of damaged asbestos 	<ul style="list-style-type: none"> • Quick and economical for repairs to damaged areas • May be an adequate technique to control release of asbestos dust 	<ul style="list-style-type: none"> • Hazard remains • Cost for large areas may be near removal cost • Asbestos management system required • Eventual removal may be more difficult and costly
ENCLOSURE			
<ul style="list-style-type: none"> • Removal extremely difficult • Fibres can be completely contained within enclosure • Most of surface already inaccessible • Disturbance to, or entry into, enclosure area not likely 	<ul style="list-style-type: none"> • Enclosure itself liable to damage • Water damage likely • Asbestos material cannot be fully enclosed 	<ul style="list-style-type: none"> • May minimise disturbance to occupants • Provides an adequate method of control for some situations 	<ul style="list-style-type: none"> • Hazard remains • Continuing maintenance of enclosure • Asbestos management system required • Need to remove enclosure before eventual removal of asbestos