

# Plan A for Asbestos

By Paul Phillips

Planning is essential for the safe and smooth running of your school's asbestos management systems.



With as many as three quarters of schools and further/higher education establishments having some Asbestos Containing Materials (ACMs) in their building portfolio, it is not surprising that organisations are taking their responsibilities to manage it seriously.

Many school buildings date from periods when asbestos was widely used in construction, prior to the total banning of the material as a building product in 1999, meaning that most schools in the UK will have a requirement for an asbestos management plan and the day-to-day responsibilities that such a plan entails.

Current Government advice states that asbestos only becomes hazardous to health when the fibres become airborne and that if ACMs are left in good condition and undisturbed they can be relatively safe. It is therefore the responsibility of the "employer" or duty holder to ensure that any ACMs remain in a safe condition and that work that involves disturbance to the fabric of the building must not be initiated without consultation. In the case of Academies and Free Schools the employer is understood to be the school governors, for Independent Schools it may be the proprietor, governors or trustees.

Key responsibilities for the duty holder can be summed up as follows:

- **Conduct a management survey of ACMs in your school**
- **Assess the risks associated with these ACMs**
- **Devise a plan for managing asbestos in your school**
- **Make sure staff and visitors know the risks and the precautions they should take**
- **Keep the management of asbestos in your school under review**

An asbestos management plan (AMP) monitors all ACMs on a continuous basis. In 2013/2014 HSE inspections of 153 non-local authority schools resulted in 44 schools being sent written advice on improving their asbestos management. Twenty of the 44 were issued with improvement notices: eight had no management plan; eight had inadequate assessments; two had failed to manage the risks and two had inadequate training and information for employees.

An adequate plan should contain a comprehensive inventory of the locations,

quantities and conditions of all ACMs in the school's fabric, an emergency plan of action in case of uncontrolled release of asbestos fibres and documented responsibilities for key persons.

The asbestos register is based on information gathered during an asbestos management survey. This should be conducted by a UKAS-accredited consultancy which will inspect all accessible internal and external areas which may be accessed by staff, pupils, parents, visitors and maintenance personnel. The survey will include a visual inspection of all floors, cladding, partitions, panels, walls and doors, ceilings, fanlights, soffits and pipe runs, as well as windows, sills and sashes, back panels to radiators, stair nosing, toilet cisterns and sinks. An appropriate number of samples will be taken in areas of interest, in particular where there is a likelihood of repeat materials on other floors. Photographs in the report will identify the sample reference and location.

## Fibre Release Potential

High

Medium

Low

Very Low

Based on this information, the consultant will prepare the asbestos register, a table of all suspected ACMs that includes their location, estimated quantity, condition and a recommendation for action i.e. how the materials should be managed. The condition of all ACMs should be re-inspected by a consultant on an annual basis at least. It is, however, a common misconception that the data in the asbestos register can be used to inform and instruct maintenance staff or your refurbishment contractor. While the management survey will involve some sampling, it is not fully intrusive and is likely to include some "exclusions", i.e. locations that the surveyor was unable to access, such as high areas, external materials, void spaces etc.

To prevent asbestos from becoming a safety issue during a refurbishment project you should commission a refurbishment and

demolition (R&D) asbestos survey. Unlike the management survey, this will involve fully intrusive techniques to access, inspect and sample suspected ACMs in all areas that are likely to be disturbed by the works. Samples will be taken of any suspected ACMs and tested in a laboratory. Indeed, when preparing for intrusive maintenance or refurbishment works, an R&D survey is a legal requirement.

The recent case of an Academy school in Essex being fined for the poorly planned refurbishment project of an old boiler room has resulted in coverage by the national press. The failure to commission an R&D survey resulted in a £26,000 fine plus £20,000 costs. It was revealed that basic measures to share information on the potential whereabouts of asbestos containing materials (ACMs) with relevant staff, in this case the school caretakers, were not in place, leading to the innocent disturbance of the fabric of the building and inadequate control measures.

HSE Inspector Glyn Davies said after the hearing, "this prosecution should act as a reminder, not just to schools but to all persons in control of the repair and maintenance of non-domestic premises, of the need to ensure that a suitable and sufficient assessment of risk from asbestos is carried out, and that correct control measures are put in place to ensure that exposure to asbestos is prevented, so far as is reasonably practicable."

Geoff Cox, the Head of HSE's Public Services Sector, has said: "Schools should not be under any illusion – managing asbestos requires ongoing attention. Schools now have access to a wealth of guidance setting out clear and straightforward steps to achieve and maintain compliance. Where duty holders fall below acceptable standards, HSE has taken, and will continue to take, enforcement action".

To minimise the cost and disturbance caused by the R&D survey it is important that you brief your asbestos consultant thoroughly. Provide them with detailed plans and a full scope of the project so that they can focus their investigation on the areas that are likely to be disturbed by the works. The survey should ideally take place out-of-hours, i.e. evenings, weekends or holidays, and a member of the FM team should be available to accompany the surveyor to provide access to locked rooms/cupboards, plant rooms and void areas as required. Carrying out the survey out-of-hours will also prevent any unnecessary alarm that can occur should pupils/parents see operatives wearing personal and respiratory protective equipment

While the Government issues general advice on school asbestos management it also recommends that specialist, technical advice is taken in order to ensure that your asbestos is being properly managed.

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