

Document level: Trustwide (TW)

Code: HS2

Issue number: 3

Asbestos Management Policy

Lead executive	Director of Nursing Therapies Patient Partnership
Authors details	Head of Estates - 01244 397726

Type of document	Policy
Target audience	Estates Department and External Contractors
Document purpose	To ensure that CWP manages the risk associated with Asbestos in buildings in accordance with the requirements of 'The Control of Asbestos Regulations 2012'

Approving meeting	Infrastructure Sub-Committee	Date 26-Feb-20
Implementation date	26-Feb-20	

CWP documents to be read in conjunction with HR6 Mandatory Employee Learning (MEL) Policy

Document change history		
What is different?	Full review of the document undertaken	
Appendices / electronic forms	N/A	
What is the impact of change?	N/A	

Training	Yes - Training requirements for this policy are in accordance with the CWP
requirements	Training Needs Analysis (TNA) with Education CWP.

Document consultation	
Clinical Services	Who within this service have you spoken to
Corporate services	Who within this service have you spoken to
External agencies	Who within this service have you spoken to

Financial resource	None
implications	

External references

- 1. Management of Health and Safety at Work Regulations 1999
- 2. Construction (Design & Management) Regulations 2015
- 3. Control of Asbestos Regulations 2012
- 4. HSG 189/2 Work with Asbestos Cement
- 5. HSG 210 Asbestos Essentials A task manual for building, maintenance and allied trades of non-licensed asbestos work
- 6. HSG 227 The management of asbestos in buildings
- 7. HSG 248 Asbestos Analysts guide
- 8. HSG 264 Asbestos the survey guide

Equality Impact Assessment (EIA) - Initial assessment	Yes/No	Comments
Does this document affect one group less or more favourably than	another on	the basis of:
- Race	No	
- Ethnic origins (including gypsies and travellers)	No	
- Nationality	No	
- Gender	No	
- Culture	No	
- Religion or belief	No	
- Sexual orientation including lesbian, gay and bisexual people	No	
- Age	No	
 Disability - learning disabilities, physical disability, sensory impairment and mental health problems 	No	
Is there any evidence that some groups are affected differently?	No	
If you have identified potential discrimination, are there any exception Select	ons valid, l	legal and/or justifiable?
Is the impact of the document likely to be negative?	No	
- If so can the impact be avoided?	N/A	
- What alternatives are there to achieving the document without the impact?	N/A	
- Can we reduce the impact by taking different action?	No	
Where an adverse or negative impact on equality group(s) has bee screening process a full EIA assessment should be conducted. If you have identified a potential discriminatory impact of this proceed the human resource department together with any suggestions as to reduce this impact. For advice in respect of answering the above of human resource department.	dural docu o the actio	ment, please refer it to on required to avoid /
Was a full impact assessment required?	No	
What is the level of impact?	Low	

Contents

Quick ı	reference flowchart	4
1.	Introduction	5
1.1	Relevant legislation	5
2.	Asbestos management arrangements	6
3.	Asbestos management procedures	6
3.1	General	6
3.2	Asbestos register database	7
3.3	Procuring and undertaking surveys and re-inspection surveys	7
3.4	Priority assessments	
3.5	Procedure for the issue of asbestos reports	8
3.6	Monitoring of asbestos management procedures	8
3.7	Working with asbestos or presumed asbestos	8
3.7.1	Decisions about management options	
	Figure 1 – Materials suspected of containing asbestos	
	Figure 2 – Sprayed asbestos coating and pipes and vessel insulation	
	Figure 3 – Asbestos insulating board and insulating blocks and composite products	
	Figure 4 – Other asbestos materials which are encapsulated in a resilient matrix with limited	
	ability to release fibres	
3.8	Procedure to be taken for all building works	
3.8.1	Planning Works	
3.8.2	Discovery of ACM's / Suspected ACM's During Building Works	
3.9	Procedure for Works which are HSE Notifiable	
3.9.1	Appointment and Control of Contractors	
3.9.2	Supervision by Estates Department Staff	
3.9.3	Liaison with site staff / duty holders	
3.10	Works which are not HSE notifiable	
3.10.1	Building or maintenance works	
3.10.2		
3.11	Procedure for managing emergency works	
3.11.1	5 ,	
0.44.0	Figure 5 – Discovered or damaged materials that could contain asbestos	
	Fire procedure	
4.	Staff training	
4.1	Asbestos surveyors and consultants	
4.1.1	Prequalification	
4.2	All Contractors	22

Quick reference flowchart

For quick reference the guide below is a summary of actions required.

Estatesteam

- Identify whether works required will affect known ACM's or undertake management survey to establish this fact.
- Undertake quotation exercise, following SFI's, for Asbestos Contractor for required action.
- Appoint Contractor

Asbestos Contractor

- Provide Estates team with Risk Assessment and plan of works
- Undertake work as per specification

Estates team

- Monitor Contractor to ensure plan of works and risk assessments are followed
- Ensure work is completed to specification
- Authorise remedial works to rectify dangerous conditions

Estates team

- Upload asbestos survey to MiCad system (Asbestos register / database)
- · Create risk assessment for remaining remedial works if required
- Add risk assessment to risk register and infrom risk management lead

Estates team

- Create specification for remedial work required
- Seek quotes as per SFI's or instruct Asbestos Contractor
- Instruct, manage and monitor chosen service provider

Chosen Provider

- Provide Estates team with Risk Assessments and plan of works
- •Undertake work as per specification

Estatesteam

- •Ensure works have been completed as per specification
- Obtain all relevant certification relating to works
- Inform HSSF works have been completed

Update Risk Register as required.

- Review Micad Asbestos register / database
- Review Action Plan and ensure all relevent actions are being undertaken
- Review Asbestos Policy

1. Introduction

This policy has been produced to provide a framework to manage all asbestos within the control of Cheshire & Wirral Partnership NHS Foundation Trust (CWP) and in doing so to satisfy the requirements of The Control of Asbestos Regulations 2012.

1.1 Relevant legislation

CWP has a duty to assess the risks to people, property and the environment arising from the activities of our services and ensuring that effective risk control measures are in place. The legislation below applies to the control of the risks from asbestos.

The Control of Asbestos Regulations 2012

These regulations require the duty-holder, including any persons / organisation who to any extent have control of premises, is required to undertake the following:

- Take reasonable steps to find materials likely to contain asbestos;
- Presume that materials contain asbestos unless there is strong evidence to presume that they
 do not:
- Assess the risks to anyone being exposed to asbestos;
- Make a written record of the location and condition of asbestos or presumed asbestos and keep it up to date;
- Where necessary repair or remove asbestos material due to its condition or location;
- Monitor the condition of asbestos or presumed asbestos where retained in a premises;
- Prepare and implement a plan to manage the risk to ensure that information is given to people
 who may disturb asbestos during work activities, and to ensure that asbestos or presumed
 asbestos is kept in a good state of repair;
- Review and monitor the action plan and the arrangements put in place to manage asbestos.

The Management of Health and Safety at Work Regulations

Requires employers to carry out suitable and sufficient risk assessments for all activities of employees at work. It also requires employers to assess the risks to health and safety arising from work activities of persons not in his employment. The Regulations stipulate a range of other obligations which employers must fulfil to manage the Health and Safety of its activities.

The Construction (Design & Management) Regulations 2015

These regulations apply to <u>all</u> construction activities and place statutory duties on the client, designers, contractors and others involved with such works.

The CDM Regulations make specific reference to the Control of Asbestos Regulations 2012 to emphasise the duty of the client to ensure that sufficiently detailed pre-construction information is made available to those who need it. This information should include details about the state or condition of any premises, including the presence of hazardous materials such as asbestos, to the CDM Coordinator before any work starts.

There is also a duty to ensure that relevant safety information, including any asbestos remaining within the building, is included or referred to in the Health and Safety File (which is a document produced at the end of the project containing essential H&S information about the building or facility).

The Health and Safety File must be made available for inspection by any person who needs information contained within it.

2. Asbestos management arrangements

CWP, in recognition of its duties under the Health and Safety at Work etc Act 1974 towards its service users / patients, employees, contractors, members of the public, and emergency services, undertakes to protect people from exposure to asbestos during works of any nature or arising from the condition of Trust's property and to manage all installed asbestos containing materials responsibly.

CWP undertakes to provide sufficient resources to fulfil these asbestos management duties. In summary these duties will include the following:

Determination of the presence of asbestos by undertaking surveys of its building stock in sufficient detail to reduce the likelihood of asbestos exposure to the lowest practicable level. The findings of the surveys will be made available to those who require it by means of printed asbestos registers and via electronic copies.

- Not to undertake or contract out any planned work that exposes or is liable to expose any
 person to asbestos without ensuring an assessment of that exposure has been completed.
 Where the assessment indicates the likelihood that asbestos will be disturbed, the work shall
 be undertaken by a competent contractor and, where necessary, a licensed asbestos
 contractor;
- Ensure that all employees are provided with suitable guidance and asbestos awareness training where they are involved in the management and maintenance of Trust's property or who potentially may come into contact with asbestos during the course of their employment;
- Ensure that all relevant personnel are made familiar with this policy and the associated guidance, and best practice. In this way, the Trust will ensure that the health and safety of all our staff and other persons are not put at risk from exposure to asbestos fibres;
- Monitor and audit the procedures and arrangements put in place by the Asbestos Management Policy, and manage any corrective actions arising from such inspections.

This policy will be reviewed and updated at least every three years or sooner if required.

3. Asbestos management procedures

3.1 General

No works are to be carried out in any premises without prior consultation with the Responsible Person within the Estates Department. No repair works are to be carried out on premises "flagged" as containing Asbestos Containing Materials (ACM's) or suspected ACM's without prior consultation with the Responsible Person and the Asbestos Management Policy.

A vital aspect of the management of asbestos is the maintaining of the asbestos register database which is to remain a 'live document' and is updated as circumstances change e.g. change of use of a building, change of regulations. In such circumstances a review will be carried out.

In brief, this section details the following:

- The content of the asbestos register database and its implementation;
- Procedures for undertaking asbestos surveys and inspections;
- Procedures for ascertaining the location and condition of known or presumed asbestos containing materials;
- The means of recording this information in reports using priority assessments, including material and priority assessment scores;
- The method of retaining the asbestos registers and databases;
- Monitoring arrangements;
- Auditing arrangements;
- Procedures for working with asbestos or presumed asbestos;
- Procedures for managing emergency works.

3.2 Asbestos register database

Asbestos register database is retained and regularly updated by the Estates Department competent person. It identifies specific items regarding asbestos management and summarises actions required to redress deficiencies.

The Asbestos register database will be revised regularly as required and will address the following:

- The asbestos remedial programme (when applicable);
- Details of the issue of survey reports to the respective duty-holders;
- Details of annual re-survey and inspections of managed in situ asbestos.

The register database is to be reviewed annually or as follows:

- Whenever the use of an area changes;
- Whenever circumstances change;
- In the event of an incident such as accidental damage.

The competent person retains and manages the asbestos register database.

All asbestos data on CWP properties is to be held electronically using the asbestos register database. The Estates Department will ensure that access is given to the database to all those who may require it.

Details of each site that CWP either own or lease or occupy will be held in the asbestos register database with full details of all Asbestos related information including historical data.

Each Estates workshop will be issued with the latest asbestos register summary - providing details of known or presumed asbestos being managed in situ throughout CWP Estate.

3.3 Procuring and undertaking surveys and re-inspection surveys

Procedures to be undertaken for all properties

All surveys and reports will be carried out by a competent asbestos surveying consultancy.

Refurbishment or demolition surveys will be undertaken when building or maintenance works are planned and there is a risk identified of concealed asbestos.

CWP Estates Department staff will undertake the following process where applicable when commissioning surveys:

- Inform employees and others who may be affected by the survey.
- Ensure that arrangements have been made to facilitate access to all planned survey areas.
- Collate and convey all relevant information about site hazards and risk assessments to the relevant surveyor.
- Where available, provide copies of original and up to date building plans and other relevant information to assist the surveyor to determine the likely presence of ACM's.
- Where necessary arrange a pre-survey meeting with the surveyor to assess the information obtained from the above items.
- Where necessary undertake a brief walk-through with the surveyor to become familiar with the layout of the premises and gain an appreciation of the project.

All surveys will be undertaken in accordance with HSE's publication 'Asbestos: The survey guide' HSG264.

CWP will harmonise the report formats from different surveyors for consistency.

3.4 Priority assessments

The priorities and the timetable for actions are to be formulated following careful risk assessment, taking into account the guidance given in HSG227 the "Management of Asbestos in Buildings".

Priority assessments are given in the recommendations of the base *Management Surveys* commissioned from specialist Asbestos Consultants.

The surveyor responsible for each specific survey assigns material, priority and total risk assessment scores.

The resulting asbestos survey reports give recommended prioritisation of work based on risk.

3.5 Procedure for the issue of asbestos reports

The Estates Department will issue a printed / electronic copy of the asbestos report(s) for buildings at the time of contractor induction to site or for any other associated purpose.

3.6 Monitoring of asbestos management procedures

Monitoring of the procedures laid out in this policy will be undertaken internally within the estates department.

At least one random check for each of the following aspects of the asbestos management system will be undertaken each time a survey or re-inspection report is issued:

- An overview check on each survey report upon its issue to the Estates Department;
- A check that each survey report has been uploaded onto the asbestos database system within a reasonable time following its issue.

The Head of Estates will review each monitoring report and take corrective action to redress any specific or functional deficiencies through the framework of Statutory Standard compliance meetings.

3.7 Working with asbestos or presumed asbestos

3.7.1 Decisions about management options

The following flowcharts are provided for CWP Estates Department staff to decide on actions to be taken when dealing with suspected ACM's. These are based on the guidance notes in appendix 5 of HSG227 from where further detailed guidance information can be found.

NO Does the material contain asbestos? YES **YFS** Is the material in good condition? NO YES Is the material spray or See Figure 2 pipe lagging? NO YES Is the material insulating See Figure 3 board or blocks? NO YES See Figure 4 Other asbestos material Record, manage. Record monitor. Plan for non-asbestos removal as the material preferred option

Figure 1 – Materials suspected of containing asbestos

Explanatory notes Figure 1 – Materials suspected of containing asbestos

- **1A**. The Control of Asbestos Regulations 2012 (Regulation 6) require that employers shall not carry out any work which exposes or is liable to expose any of their employees to asbestos, unless they have made an adequate assessment of that exposure. Furthermore, employers are obliged (Regulation 5) to identify the type of asbestos involved in the work, or assume that it is not chrysotile alone and for the purposes of the Regulations, treat it accordingly.
- **1B**. The purpose of an assessment (Regulation 6) is to enable a correct decision to be made about the measures necessary to control exposure to asbestos. If the assessment concludes that exposure is liable to exceed the control limit and will not be sporadic, low intensity and of short duration (Regulation 8), then other provisions of the Regulations will apply. The assessment also enables employers to satisfy themselves and to demonstrate to others that all the factors pertinent to the work have been considered and that an informed and correct judgement has been reached about the risks and the steps that need to be taken to achieve and maintain adequate control.
- **1C.** Where material is in good condition but is, or will become, highly vulnerable to damage, management alone may not be sufficient to prevent a hazard. Treat the material as not in good condition.

- **1D**. Insulating board was frequently used as a general building board and visually may be confused with plasterboard, non-asbestos insulating board, e.g. Superlux, or flat asbestos cement sheet. Bulk samples will distinguish insulating board from plasterboard. Asbestos cement was normally be made with chrysotile and insulating board with amosite, but all types of asbestos have been used in varying proportions in both products. Insulating board was frequently nailed in position while asbestos cement was often fixed with screws or bolts.
- **1E**. Some types of 'Caposil' insulation blocks, found in some storage and warm air heaters manufactured prior to 1976, contain asbestos. For the purposes of these assessment charts, these blocks should be treated like insulating board.

YES Is the material readily Isolate the area + carry out repairable? repair work if necessary See Note 2B NO Is the material accessible? See Note 2C YES NO Is the damage extensive? See Notes 2B & D Is the damage extensive? See Notes 2B & D **YES** YES NO Is there loose, friable material? Seal or encapsulate See Note 2E YES **YES** Is enclosure feasible? Enclose See Note 2F NO Remove Record, manage monitor and plan for removal Update asset registers

Figure 2 – Sprayed asbestos coating and pipes and vessel insulation

Explanatory notes Figure 2 – Sprayed asbestos and lagging

- **2A**. This flowchart deals with materials which are considered not to be in good condition. All, except work of a sporadic, low intensity and short duration must be carried out in accordance with the Approved Code of Practice, Work with asbestos (L143) 2012 and be carried out by a licensed contractor.
- **2B**. To be readily repairable, damage to the installed material must be slight. Repair work should be restricted to:
 - Patching of small areas of the asbestos material;
 - Applying small areas of sealant;
 - Making good slight damage to boxing

Repairs should be carried out taking the appropriate precautions and observing the Control of Asbestos Regulations, the Approved Code of Practice (L143) 2006 and HSE guidance.

2C. Material that is readily accessible may be vulnerable to further accidental or deliberate damage, due to adjacent repair or maintenance, impact by people, vehicles or objects, or vandalism. Damage

by water or vermin (rodents and birds) is also possible. The assessment should take account of the current and planned building use and occupancy.

- **2D**. Accessible material that is not extensively damaged will probably need protection against further damage and sealing or enclosure may be necessary.
- **2E**. Dust, loose debris and quantities of material detached from the main body may indicate that the asbestos is breaking up and highly friable. If there is no evidence of this and the asbestos is firmly bonded to the substrate, it can be sealed or enclosed. Sprayed coatings and lagging can be sealed with sprayed or bituminous coating or with a hard-setting cement-type coating. If necessary, cement coatings can be supported by metal mesh. Sealed sprayed coatings may be vulnerable to water damage, particularly when they are located on the underside of flat roofs.
- **2F**. Enclosure may not be feasible if the area involved is very large, for example, in long roofing structures or where access to asbestos material is restricted. If the enclosure would be vulnerable to damage, if access is needed for maintenance and repair, or enclosure is not feasible, then the asbestos must be removed.
- **2G**. When sprayed coatings or laggings are removed, it will be necessary to empty and enclose or seal off the working area. The whole area should be thoroughly cleaned afterwards. As it is not usually possible to remove all traces of asbestos, a sealing coat should be applied to the substrate after removal. After removal work, the airborne fibre concentration should be measured before the area is reoccupied, using procedures specified for site clearance in the "Analysts Guide" HSG248 and other HSE Guidance.

YES Is the material readily Isolate the area + carry out repairable? repair work if necessary See Note 3B NO Prevent access to NO Is the material accessible? contaminated areas & See Note 3C inform the building manager YES NO Is the damage extensive? See Notes 3B & C YES NO Is sealing or enclosure feasible? Seal or enclose See Note 3D NO Remove Record, manage monitor and plan for removal Update asset registers

Figure 3 – Asbestos insulating board and insulating blocks and composite products

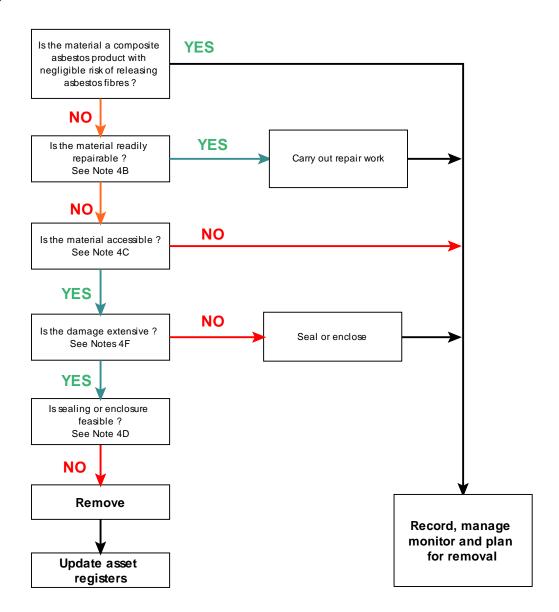
Explanatory notes Figure 3 – Asbestos insulating board, insulating blocks and composite products

- **3A**. The chart deals with material that is considered not to be in good condition. All work with asbestos is controlled by The Control of Asbestos Regulations 2012. Any work on insulating board should follow HSE guidance in the Approved Code of Practice (L143) 2006, and asbestos Essentials (HSG 210)
- **3B**. To be readily repairable, damage to board must be slight. Surface scratches may be sealed or painted, breaks taped and small punctures patched with filler. If the board is not covered it may be painted or otherwise sealed as a precaution against light abrasion.
- **3C.** Material that is readily accessible may be vulnerable to accidental or deliberate damage, due to adjacent repair or maintenance, impact by people, vehicles or objects or vandalism. Damage by water or vermin (rodents and birds) is also possible. The assessment should take account of the building use and occupancy.
- **3D**. The material can be sealed by spraying with an initial coat of diluted PVA emulsion, followed by one or more full strength coats. The surface should be prepared. Damaged material should be repaired where possible (see Note 3B), but the material should not be sanded or wire brushed. Dusty surfaces can be cleaned with a suitable industrial vacuum cleaner that conforms to BS 5415 (Type H) or wiped with a damp cloth, which should be sealed in a plastic bag afterwards while still damp. A domestic vacuum cleaner must not be used. Sealing does not protect the material from more violent impact. Covering the board with hardboard, plasterboard or a similar material may be preferred;

materials chosen must take into consideration any fire protection issues and the prevention of the spread of fire through cavities.

- **3E**. If the material is very badly damaged, is very extensive in area, or is subject to frequent violent impact, then sealing or enclosure may not be feasible and removal should be considered.
- **3F**. Removal of large areas of asbestos insulating board must be carried out by a licensed contractor. The HSE's Approved Code of Practice Work with asbestos containing materials, 2006 (L143) provides advice on work with asbestos insulation board and guidance is also available on controlled stripping. Although it may not be necessary to empty a building, the working area should be segregated and people not engaged in the work should be kept away. Asbestos insulating board should be wetted to suppress dust during removal and sheets should be removed whole, not broken up. Replacement board must have equivalent fire performance where this is required.

Figure 4 – Other asbestos materials which are encapsulated in a resilient matrix with limited ability to release fibres



Explanatory notes Figure 4 – Other asbestos materials

- **4A**. The chart deals with other asbestos containing material (e.g. asbestos cement, textiles, gaskets, ropes & encapsulated products such as thermoplastic tiles, roofing felts, etc.) that is considered not to be in good condition. Work on asbestos cement should follow HSE guidance in the Approved Code of Practice L143 and the guidance in Guidance Note Working with Asbestos Cement 1999 (HSG 189/2) and Asbestos Essentials (HSG 210 & 213).
- **4B**. To be readily repairable, damage to the material must be slight. Surface scratches may be sealed or painted, breaks taped and small punctures patched with filler.
- **4C**. Material that is readily accessible may be vulnerable to accidental or deliberate damage, due to adjacent repair or maintenance, impact by people, vehicles or objects, or vandalism. Damage by water or vermin (rodents and birds) is also possible. The assessment should take account of the building use and occupancy. Old sheet material used outside (e.g. for roofs) may have extensive moss and lichen growth on it, which will accelerate degradation and weathering of the cement matrix and thus lead to greater release of fibres.

Asbestos cement is a very common material. It is unlikely to be sealed where it is used outside and where it is used inside buildings, sealing is likely to be confined to painting – although some products have factory-applied coatings. Water damage and vermin are unlikely to be a problem, although the material becomes porous with age and may then allow water to leak through.

- **4D**. Accessible asbestos cement which is not readily repairable but which has only suffered slight damage can be sealed with a suitable coating. The surface should be prepared. Damaged material should be repaired where possible (see Note 4B), but the material should not be sanded or wirebrushed. Dusty surfaces can be cleaned with a suitable industrial vacuum cleaner that conforms to BS 5415 (Type H) or wiped with a damp cloth, which should be sealed in a plastic bag afterwards, while still damp. A domestic vacuum cleaner must not be used. Asbestos cement used outside may need treatment with a biocide before painting. Moss and lichen may be removed by low pressure water jetting. Asbestos cement is alkaline and should be primed with an alkali-resistant primer or a chlorinated rubber of oleo resinous paint, followed by one or more top-coats. Where possible, both sides of flat sheets should be painted. Installations, which are badly deteriorated and will not allow a surface to adhere, should be removed.
- **4E**. Warning notes should be attached where material is readily accessible. In the case of asbestos cement roofs, the notes should indicate the material is fragile and the risk of falling through it. Asbestos cement roofing sheets or tiles may have fibre washed off which can collect in gutters and this should be borne in mind during maintenance of buildings.
- **4F**. Removal of large amounts of asbestos cement should be carried out by a specialist contractor or trained staff. Small quantities can be safely removed provided that safety precautions are followed. Although it may not be necessary to empty a building, or seal off the working area during removal, people not engaged in the work should be kept away. Sheets should be wetted to suppress dust during removal and removed whole, not broken up. The material removed and any dust and debris should be carefully collected, small pieces dampened and sealed in strong plastic bags marked 'Asbestos'. The whole area should be thoroughly cleaned (see Note 4D) using a dustless method. After large-scale work, especially where there has been breakage of asbestos cement sheets, a visual inspection should be undertaken and airborne fibre concentrations should be measured before the area is reoccupied.
- **4G**. Products which are less well encapsulated (e.g. asbestos textiles and gaskets) will release fibres more readily and use of controlled work methods by maintenance workers and enclosure or sealing to prevent damage may be necessary in some circumstances.
- **4H.** If the damage is slight, remedial work is unlikely to be necessary. The damage should be monitored and any decision reviewed if circumstances change (e.g. the area becomes accessible)

3.8 Procedure to be taken for all building works

3.8.1 Planning Works

The following procedure is to be adopted before **any** work takes place on CWP owned or occupied premises:

- The relevant asbestos register is made available to all parties by the Estates Department unless they already have access.
- The register is to be consulted prior to any work being carried out by all commissioning officers; sub-consultants and or contractors' operatives (in-house and external) to reveal identified or presumed ACM's.
- The asbestos information will be handed to the trades as an instruction to work and will contain a listing of any hazardous products presumed or identified.

3.8.2 Discovery of ACM's / Suspected ACM's During Building Works

The following actions are to be taken in the event that previously unidentified ACM material is suspected or identified on site.

- Work is to stop and the area isolated.
- If the item has been presumed or identified WITHOUT the item being damaged, the operative only needs to notify their manager who will contact CWP Estates Department. The Estates Department will investigate the circumstances and take action to either have it removed or encapsulated as appropriate.
- However if the item is damaged in any way, the procedures laid out in section 3.12 *Procedure for Managing Emergency Works* must be followed.

3.9 Procedure for Works which are HSE Notifiable

All required remedial work will be undertaken by approved specialist contractors who have access to the asbestos register and are fully acquainted with the procedures contained within this policy.

A formal written safe system of work for this remedial work will be prepared by the appointed contractor and, where considered necessary by the Estates Department, approved by them or by a competent person appointed to act on the department's behalf.

The Estates Department will arrange for a specialist contractor to carry out the work of removal, repair and / or disposal of the ACM, and will appoint a specialist analytical contractor who will in no way be connected to the removal contractor to monitor all works (excluding waste pick ups of non licensable materials removed by external contractors who have the correct procedures, controls and insurances in place).

If notifiable items are present within the scope of any building works there is a requirement to provide the HSE with a two week notification period prior to the removal works being allowed to proceed. The Enforcing Authority must be notified by the appointed licensed contractor using ASB5 documentation.

CWP project managers are to endeavour to provide appointed contractors with greater than the minimum two weeks notification period and schedule asbestos remedial works at <u>the earliest practical</u> opportunity to minimise the risk of delays to overall project programmes.

Only when verification is provided that no ACM's are present by means of production of a validated completion certificate from the licensed asbestos contractor (and, where applicable, an independently issued air clearance certificate) will re-occupation be allowed to the areas of the building affected by asbestos.

Where instructed by the Estates Department the asbestos consultant, where appointed is to coordinate and monitor the safe system of work, method statement and controls.

3.9.1 Appointment and Control of Contractors

Only contractors from the approved list will be used for work on any asbestos materials (except for minor tasks which may be carried out by trained CWP staff using appropriate RPE, PPE & methods with an accurate risk assessment (ONLY on textured coatings and composite products).

The approved list of contractors is held by the Estates Department.

All work shall be undertaken strictly in accordance with The Control of Asbestos Regulations 2012, and Health and Safety Commission Approved Codes of Practice and HSE Guidance.

In all instances where work on a material of a known asbestos composition is to take place, the removal specification or method statement provided by the contractor is to be strictly adhered to.

3.9.2 Supervision by Estates Department Staff

All works involving ACM's shall be adequately supervised by the Estates Department or competent persons appointed by them.

In all cases the licensed asbestos contractor shall submit the following documents to the CWP Responsible person (or other appointed competent person) who shall check the following before works are approved and allowed to commence.

- Assessment of exposure;
- Plan of work:
- Current HSE licence (if applicable);
- Specification of plant and equipment to be used;
- Details of waste disposal arrangements;
- Training / medical records of operatives;
- Current certificate of insurance.

In cases where included in the licensed asbestos contractor's Plan of Work or when the Estates Department deems it necessary, air quality monitoring will be undertaken throughout asbestos removal works in accordance with the Control of Asbestos Regulations 2012, the Analysts' Guide (HSG 248) and relevant HSE Guidance Notes. This shall be carried out by an asbestos consultant independent of the Main Contractor or the Licensed Asbestos Contractor.

3.9.3 Liaison with site staff / duty holders

The person appointed to supervise the works shall liaise with the respective building manager / duty holder to facilitate other indirect arrangements necessary for all asbestos remedial works to be undertaken.

Factors to be considered are to include:

- The need to liaise with the Principal Contractor where the project is HSE notifiable under the CDM Regulations;
- The implications on the fire risk aspects of the building;
- Temporary signage provision for the building users and the public;
- Notification of the proposed works to building users and others;
- · Provision of temporary services for the contractor;
- Provision of temporary accommodation and or space for the contractor.

3.10 Works which are not HSE notifiable

3.10.1 Building or maintenance works

It is permissible for building managers to instruct contractors to undertake limited non-intrusive building or maintenance activities providing the works have been assessed as low risk.

For definition purposes on CWP property, low risk means work of a minor nature which does not require the erection of enclosures to prevent the spread of asbestos but includes tasks which can be undertaken in accordance with the HSE's published information entitled 'Asbestos Essentials – Non Licensed Tasks' activities.

All contractors' staff must have received asbestos awareness training and be competent.

3.10.2 Supervision of the works by the estates department

Where permission has been given for a contractor or appointed CWP staff member to undertake works involving asbestos, the Estates Department Responsible person or appointed competent person will take the following steps before any work commences:

• Obtain a formal written safe system of the work from the contractor / including:

- Risk assessments:
- A method statement;
- Specification of plant and equipment to be used;
- o Details of waste disposal arrangements;
- Details of emergency provisions.
- Verify that the appointed contractor and individual personnel are competent (i.e. provide satisfactory evidence of asbestos awareness training) to work on or near ACM's;
- Assess all relevant information for adequacy before giving approval for commencement;
- Supervise the work until completion.

3.11 Procedure for managing emergency works

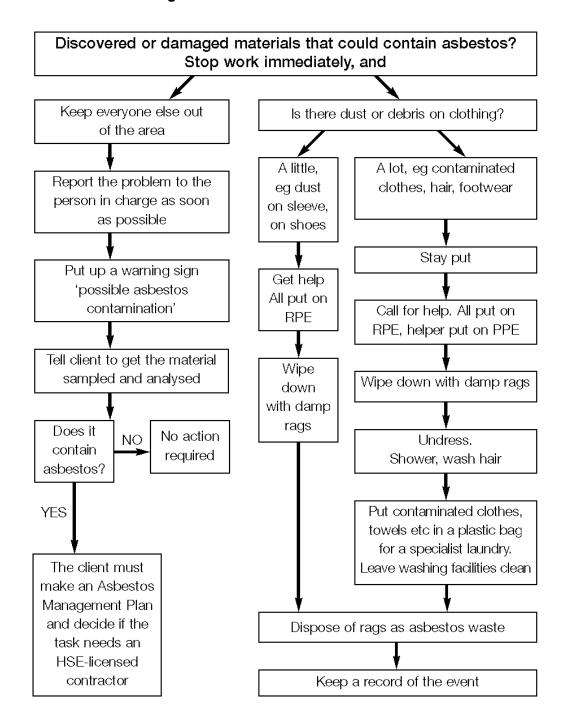
If during the course of any works, suspect materials are discovered or should there be any accidental exposure, contractors and staff are instructed that all operations **must be immediately suspended** and the Estates Department should be contacted for instruction or recommendations, which may include informing staff and building users and clearing the site.

The Estates Department will then arrange to put into place an Emergency Action Plan.

3.11.1 Procedure for emergency works

The following are the actions which are to be taken in the event of emergency asbestos works being reported in accordance with Figure 5 below which is an extract from the HSE website:

Figure 5 - Discovered or damaged materials that could contain asbestos



Procedures

- Stop this work immediately.
- Follow the chart above or do a risk assessment to decide who must do the work you may need a licensed contractor.
- Minimise the spread of contamination to other areas.
- Keep exposures as low as you can.
- Clean up the contamination.

- 1. Emergency works are reported:
 - During normal office hours to the main Estates office on 01244 397711 (this call will then be redirected to the appropriate Estates officer);
 - o Out of hours to the on-call manager within the Estates Department
 - o For all Wirral and Chester properties Tel 01244 365000 (ask for Partnership Estates on call);
 - o For all East and Central properties Tel 07917 228099.
- 2. The estates department appointed person will visit site with a copy of the latest asbestos survey report.
- 3. The estates department appointed person will make arrangements for isolation of the contaminated area or building to safeguard personnel and facilitate a preliminary investigation to be undertaken. If the call-out is outside normal working hours, the investigation will normally take place during the next working day.
- 4. An asbestos consultant is to be engaged as necessary to provide support by undertaking sampling and or air monitoring.
- 5. A risk assessment is undertaken by the estates department appointed person to determine what further actions are needed.
- 6. Any urgent remedial works are instigated immediately where necessary using a CWP approved licensed asbestos contractor.
- 7. Upon completion of remedial works the asbestos information is updated onto the Asbestos database.

3.11.2 Fire procedure

In the event of a fire in the premises and the Fire and Rescue Service is called, it is the duty of the building's Fire Marshall to ensure that Estates Department is contacted so that the building asbestos register is made available to the respective Fire Officer upon their arrival.

4. Staff training

General

Suitable training is to be provided and refresher courses undertaken where applicable (e.g. change of regulations, evidence to show standards are slipping, procedures not being followed) to ensure that staff who are at risk of inadvertent exposure to asbestos are competent to carry out work safely, without the potential to generate risks to their own and other persons' health.

Technical Staff

All technical staff involved with a responsibility for building repairs and improvement works or with a responsibility for operatives and contractors will attend mandatory asbestos awareness training.

Professional Personnel, Technical Staff, Line Managers & Building Managers

All professional personnel who influence any works or potential works with asbestos shall receive Asbestos Awareness training.

Refresher training should be as and when required (if the training appears not to be robust enough and with regulation / procedure changes)

Non-Licensed Contractors

Non-licensed contractors employed by the duty holder will not undertake work on asbestos containing materials. However, they will have to demonstrate that they are competent for the work and have received appropriate Asbestos Awareness training by submitting the relevant training certification.

4.1 Asbestos surveyors and consultants

4.1.1 Pregualification

Appointed organisations shall hold UKAS accreditation to ISO 17020 and 17025 or demonstrate that they are working to those standards for asbestos surveying, bulk analysis, air monitoring, 4 stage clearance and sampling.

4.2 All Contractors

Prequalification of contractors

All contractors including licensed asbestos contractors who undertake any works for CWP are required to complete a Pre-Qualification Questionnaire (PQQ) which requires them to provide evidence of competence and, as a minimum, asbestos awareness. The PQQ competency assessment shall be audited externally by a consultant.

Training

Operatives and supervisors employed by Licensed Asbestos Removal Contractors shall demonstrate training and refresher training in compliance with published HSE guidance.

Asbestos registers

All asbestos surveys are included in the web-based database and managed by the Estates Department. Printed copies of reports shall be distributed to building managers as appropriate.