



Nuneaton and Bedworth Borough Council

Corporate Asbestos Management Plan

(002)

November 2016

Related Documents: -

001: - Corporate Asbestos Policy

003: - Corporate Asbestos Procedures Manual

Introduction

NBBC recognises the hazards presented by exposing people to asbestos fibres and that it has a legal obligation to manage ACMs present within its estate and operations to prevent this. This asbestos management plan has been developed to outline how NBBC intends to manage the process.

Since 2003 NBBC has undertaken a programme of surveys of Council's properties to establish:-

- If asbestos of any kind was present.
- Procedures that would be required for managing asbestos.

Based on the results of those surveys a database has been compiled that reflects the known and strongly presumed asbestos content of the properties surveyed. This Management Plan details the management procedures required to ensure the Council discharges its legal obligations under Health and Safety legislation to ensure, so far as is reasonably practicable, that the asbestos is maintained in a condition that presents no risk to any person, employee, tenant, contractor or otherwise who might come into contact with it.

Surveys

Health and Safety Executive information indicates that asbestos may have been used in buildings up to and including 1999.

Since 2003 the Council have completed Management or Refurbishment Surveys (or previous equivalents) in: -

- All Corporate and Civic Buildings
- All Sheltered Housing Schemes
- All flats within sheltered housing schemes
- All Communal areas of general purpose flats blocks
- Over 95% of the general purpose housing stock to date.(As at 1 June 2016)

Future activity will involve the formal surveying of all remaining properties when access is available and reinspections on a rolling basis to add further detail to existing information.

It is recognised that in the general purpose housing stock some tenants may fail to comply with reasonable requests to allow access to their property. In these cases after all attempts to gain access by mutual agreement with the tenant have failed then the Council will refer the matter to it's Legal section and seek access through the courts.

Management Surveys

Management surveys conducted in accordance with HSE Publication HSG264. A management survey will only be used in circumstances where either a tenanted property is of an exceptionally high standard and to do a Refurbishment Survey would disadvantage the tenant or where sufficient Refurbishment surveys have been carried out in a block to enable accurate cloning to occur.. It's purpose is to locate, as far as is reasonably practical the presence and extent of suspected ACM's which could be damaged or disturbed by normal occupancy including basic maintenance.

They will also give details of the current accessibility, condition and surface treatment of the asbestos containing materials. This information is then used to undertake a risk assessment to determine whether the ACM is of a type that will release fibres and also whether people are likely to be exposed to those fibres once it is disturbed.

Management surveys should cover routine and simple maintenance work. Where more extensive maintenance or repair work is involved, there may not be sufficient information in the management survey and a localised or full refurbishment survey will be required.

Refurbishment and Demolition Surveys

Refurbishment and Demolition surveys will be the standard survey and will also be required for all work which disturbs the fabric of the building in areas where a management survey has taken place and not been intrusive.

As stated in HSG264 a full refurbishment and demolition survey will be required for extensive refurbishment or demolition projects. However, in some cases i.e. more localised refurbishment projects a survey of this type will only be necessary in the specific area / location where the works will take place e.g. within a cupboard, part of a room, kitchen / bathroom. These specific 'localised' refurbishment surveys have the specific purpose of identifying ACM's for removal, control or avoidance during refurbishment works.

Where a scheme of works (e.g. kitchen replacement) is to take place in properties

- either within the same complex
- or of an identical construction type and build date

then a representative sample of not less than 10% of the properties concerned will take place and **if** the results are consistent then they **MAY** be used to clone the remaining properties.

All surveys on NBBC properties, will be conducted by a UKAS accredited Type C approved competent surveying company accredited to international standard ISO 17020. Analysis of samples will be conducted by a UKAS accredited testing laboratory which is accredited to international standard ISO 17025.

Examples:

1. No Survey Required

- Properties built after 1999
- Renewal of electrical fittings to existing back boxes
- Door replacement programs (where there is reasonable evidence on which to make assumptions)

2. Management Surveys

- Day to day occupation
- Cleaning without abrasives
- Tiling
- Changing like for like sanitary fittings
- Routine and simple Maintenance work i.e.
 - Putting up pictures and shelves
 - Changing light fittings
 - Decoration

** In all cases a decision will need to be made as to whether the management survey provides enough information for the task.

3. Localised Refurbishment Surveys

- Any work that is likely to disturb the fabric of a building i.e. brickwork, timber, boards and panels and expose previously non-accessed voids
- Kitchen and Bathroom refurbishments
- Door widening
- Internal wall removal
- Renewal of rainwater goods

4. Full Refurbishment and Demolition Surveys

- Garage roof renewal
- Rewires
- New Heating Installations
- Major structural alterations
- Demolition Projects

**In all cases if there is any doubt the Asbestos Manager should be consulted

Survey Results

The survey results are recorded on a comprehensive database available to relevant employees, contractors and partnering organisations where applicable.

Any surveying or sampling conducted on an ad-hoc basis will also be added to the database and all electronic versions of survey reports will be stored in the same location.

Occupants of premises including domestic tenants will be informed of the location, type and condition of any known asbestos present in their premises.

Domestic tenants will also be given advice regarding asbestos and DIY maintenance within their sign up pack.

Asbestos within communal areas of premises will be labelled and warning signs may be placed alerting to the presence and location of asbestos. Where labelling and signs are considered not to be appropriate as these would be obtrusive to the interior of the premises they will not be displayed. (Refer to Corporate Asbestos Procedures Manual 003 [Labelling])

Asbestos in a domestic property will not be labelled as this is seen as a sensitive area and will also inconvenience tenants and be difficult to manage. However, a copy of the floor plan and register for the property showing the location of ACM's will be placed in all domestic properties where a survey confirms asbestos to be present.

Access to Asbestos Survey Results

The asbestos database is available to relevant personnel using an internet connection. All relevant personnel including contractors and partnering organisations will generally be provided with access to the information by either

- Password protected access to the database or
- Access to hard copies of the information

In some cases the information will be accessed centrally and the information conveyed to the relevant personnel either by telephone or hard copy, or on the 'job ticket' depending on the nature and location of the work.

Where appropriate, training in accessing and interpreting the data contained in the results will be provided.

Any employee has the right to be given, on request, information regarding acm's, air tests etc. in properties where they are working or have worked.

An extract of the survey results of each domestic property showing a plan of the property and it's asbestos register will be placed in the cupboard below the sink of the property and labelled "Do not remove." This is to provide information to the tenant and as a backup for the Council's operatives and / or contractors.

The database will be populated with the results of all surveys conducted and will be updated to reflect the results of inspections or asbestos related works.

Maintenance of the Database

As the main user of the database, the Health and safety department will be the custodians of the database and the only internal authorised source of updating the database.

Anyone who authorises licensed work involving asbestos must provide full details of any work to be undertaken to Health and Safety **prior to work commencing** and provide the appropriate records as soon as the work is completed so that the database can be updated accordingly.

Note: The asbestos records must reflect the current state of the building. It is the duty holders' responsibility to ensure that this occurs and is true.

Managing the Asbestos

Having established the location and type of asbestos in properties it is of paramount importance that the information is used to:

- i. Monitor the condition of the asbestos to ensure that it remains in a safe condition and presents no risks to anyone, e.g. employees, tenants, occupiers or the public.
- ii. Ensure that staff and contractors undertaking work with the organisations properties are informed of the presence of asbestos.
- iii. Plan work to, where possible, avoid disturbing asbestos containing materials, in the event this is unavoidable, works should then be undertaken by appropriately trained personnel in accordance with all relevant Health and Safety Legislation and guidance documents.
- iv. Provision of the asbestos register should be made where possible to ensure that contractors tendering for work are informed of the presence of any asbestos at the tendering stage.

ENCAPSULATION OR REMOVAL

Where the presence of ACM's are confirmed by testing and / or surveying, a review will be undertaken to determine the most appropriate action in each case.

The following options are available for the ongoing management of asbestos.

Any or all of these options may be applied to an area within the property and will be applied based on an individual assessment of the risk to health and safety presented by each individual ACM.

1) **No Action - Monitor**

Where the material is found to be in a good, undamaged and stable condition and is unlikely to be disturbed by the building occupants, then the material will be clearly marked as asbestos (where appropriate) and it's location and condition inspected and recorded at intervals stated elsewhere .

2) **Encapsulation and Monitor**

Where the material is found to be in a location or situation where it is likely to be disturbed by the building occupants but can be readily covered over and protected from damage, then this will be done.

The material will be clearly marked as asbestos (where appropriate) and its location and condition inspected and recorded at intervals stated elsewhere.

Encapsulation of asbestos in areas where there is a risk of mechanical impact or other damage to the encapsulation material will need careful consideration as to whether removal of the ACM may be a safer option.

Removal of the ACM will be considered in preference to encapsulation where environmental conditions exist that could damage the asbestos encapsulation thus

creating a hazard and possibly requiring frequent repeat encapsulation work to be carried out.

3) **Removal**

Where there is a high risk to Health and Safety from the ACM or where the material is in poor condition or is likely to be regularly disturbed by the building occupants or by maintenance work, then it is likely that the ACM will be removed.

Where refurbishment, larger maintenance projects or void work within an area is planned any asbestos present will be considered for removal irrespective of any previous decision that may have been taken to leave the ACM in place. HSG 264 expects asbestos located during a refurbishment survey to be removed during the refurbishment works.

Frequency of Monitoring

All known ACMs left insitu will be monitored to determine their ongoing condition. The frequency of monitoring depends on the type and location of the asbestos and its vulnerability to damage. This information is recorded in the database. As a guide ACM's are to be inspected at the following frequencies:

Locations	Frequency
Corporate and Civic Buildings	At least annually
Sheltered Schemes	At least annually
Communal areas of GP Flats	At least annually

External asbestos such as garage roofs, rainwater goods, and soffits will require minimal monitoring.

Internal asbestos vulnerable to damage such as warm air central heating cupboards lined with Amosite insulation board (brown asbestos) may require more frequent monitoring.

Tenants and employees will be made aware of the presence of asbestos and given advice on what to do if they find any damage.

Dates of inspections are recorded on the database as proof that monitoring has taken place.

Any damage identified by any member of staff or cause for concern over the condition of any ACM must be brought to the attention of the Asbestos Manager in the first instance, or in his absence the Engineering and Surveying team (for Corporate Property) or Property Services Building Surveyors team (for Housing Properties) immediately so that appropriate action can be taken.

Any ACM at risk of damage or high risk of deterioration (to the point that it becomes friable or releases fibres) will be removed or encapsulated as soon as reasonably practicable.

Recruitment of Building Operatives

When recruiting new trades people (including Agency workers) for work within the Property Services section of the Housing and Communities Directorate, the Council will ensure that all candidates are asked if they have attended a course of asbestos awareness training which has been provided by a recognised member of UKATA or IATP.

Candidates who indicate they have attended such a course will be asked to provide the original certificate as evidence to that effect and to demonstrate that their training is still in date.

Candidates who have not attended such a course or who cannot provide the original certificate as evidence may be employed but will NOT be allowed to work unless accompanied by a suitably trained operative, until such time that either a recognised course has been attended or if this is not practicable then a course of e-learning has been completed. This should take place within 3 months of commencing employment.

It shall be the responsibility of the officer arranging the recruitment to ensure that evidence of training is produced and a copy obtained, or to make arrangements for the new operative to be accompanied and to ensure training is completed.

ASBESTOS TRAINING SPECIFICATION

All relevant employees of Nuneaton and Bedworth Borough Council must have a level of training commensurate with their responsibilities for the management of asbestos.

The following matrix identifies the training that must be undertaken by all NBBC personnel with the responsibilities allocated.

Training Matrix:

Personnel	Induction / Information Leaflet	P405	P402	Premise Manager Training Course (Half day)	CAT B	Asbestos Awareness	Emergency Procedures and Personal Decon
Executive Director-Operations		✓					
Directors	✓						
All new staff	✓						
Health and Safety Team		✓					
All Staff	✓						✓
Managers and Supervisors allocating/organising work					✓	✓	✓
Asset Management / Housing Surveyors and Supervisors				✓	✓	✓	✓
Premise Managers/OLO`s				✓			
Duty Holders-Directors		✓					
Waste Disposal & Street Cleaning Operatives.(bi annual)						✓	
Building Maintenance Operatives (bi annual)						✓	
Out of Hours surveyors (bi annual)					✓	✓	✓

The following Pages outline the content/format of the Asbestos training:

Induction

All new staff will be provided with an Employee H&S Guidance booklet at the corporate induction which includes a short section on asbestos:

- Asbestos health effects
- Asbestos Containing Materials (ACMs)
- Emergency Procedures on discovering uncontrolled release of ACMs

Premises Manager Training

Provided to all members of staff undertaking the role of premise manager. The asbestos element will consist of:

- Asbestos health effects
- Management of ACMs
- Inspection and checking ACMs
- Asbestos Containing Materials (ACMs)
- Emergency Procedures on discovering uncontrolled release of ACMs
- Use of Asbestos database
- Asbestos Management Structure
- Legal Background to asbestos management

Duty to Manage Asbestos

Provided for all duty holders to contain:

- Asbestos health effects
- Asbestos Containing Materials
- Regulation 4 of the Control of Asbestos Regulations 2012
- Emergency procedures – as above

Asbestos Awareness (½ day)

Provided for all building maintenance employees every two years (refreshed annually)

- Properties of asbestos and its effect on health
- Legislative framework (in brief)
- Types of products likely to contain asbestos (photographs) and likely locations
- Operations which could result in asbestos exposure (relevant to workforce)
- Role of asbestos surveys and how to understand what is in them.
- Emergency Procedures

Advanced Asbestos Awareness

As above plus:

- Surveys: - the different types and how and when to use them. Priority Codes – how they are determined and what they mean
- Scenario exercise: - Does the survey provide sufficient information for the proposed works etc?
- When it goes wrong! examination of recent and relevant prosecutions (lessons learnt), emergency procedures etc.
- The Councils Asbestos Management Structure and Responsibilities.

P405 BOHS Asbestos management in buildings and removal works (4 days)

Externally provided recognised qualification

- Asbestos Legislation
- Asbestos in Buildings
- Asbestos Removal
- Role of The Laboratory/Analyst
- Practical Training / Examination
- Risk Assessment

P402 BOHS

Externally provided recognised qualification

- Asbestos Legislation
- Types of Asbestos
- Surveys of Asbestos
- Risk assessments
- Bulk Sampling
- Practical Training /Examination

Note: As a minimum refresher training will be provided at least every 3 years unless otherwise stated.

Corporate Asbestos Management Plan

Quality Record

Issue No.	Date	Stage	Agreed
4	March 2014	HASCOG	13 March 2014
		Management Team (MT)	N/A
		Single Member	15 April 2014
5	June 2015	HASCOG	18 June 2015
		Single Member	16 July 2015
6	November 2016	HASCOG	3 October 2016
		Single Member	
7	December 2018	HASCOG	January 2019
	TBC	Single member decision	