

**WATFORD GRAMMAR SCHOOL  
FOR BOYS**



**MANAGEMENT OF  
ASBESTOS POLICY**

Headmaster's signature

1/2/2021

Chair of Governors'

1/2/2021

## **1.0 Introduction**

- 1.1 The Control of Asbestos at Work (CAW) Regulations govern all work with asbestos regardless of where the asbestos is used, fitted or contained. The Regulations therefore cover, amongst other things, any asbestos found in equipment, buildings, and vehicles.
- 1.2 This policy is concerned specifically with the duty to manage asbestos, within the School under the Control of Asbestos at Work Regulations 2012.

## **2.0 Approved Codes of Practice and Guidance**

- 2.1 The CAW Regulations are subject to a number of Approved Codes of Practice (ACOP) issued by the Health and Safety Commission, according to the form and location of the asbestos and the type of work to be undertaken. The approved code on the management of asbestos in non-domestic premises is as follows:

Managing and working with asbestos – Approved Code of Practice L143.

## **3.0 Definitions**

### **3.1 Amphibole asbestos**

Amphibole asbestos means any of the following minerals: crocidolite (*blue asbestos*), amosite (*brown asbestos*), fibrous actinolite, fibrous anthophyllite, fibrous tremolite and any mixture containing any of those minerals.

### **3.2 Asbestos**

Asbestos means chrysotile (*white asbestos*), and amphibole asbestos and any mixture containing any of those minerals.

## **4.0 Policy Statement**

- 4.1 Watford Grammar School for Boys acknowledges the health hazards arising from exposure to asbestos and will protect employees and other persons potentially exposed as far as is reasonably practicable. This will be achieved by minimising exposure through the management of asbestos-containing materials in the workplace premises.
- 4.2 Everyone who needs to know about the presence of asbestos will be alerted, and this will include contractors or employees. No one will be allowed to start work that could disturb asbestos unless the correct procedures are to be employed. All major construction work will require a separate asbestos survey to be carried out by an independent specialist contractor before any works can commence.
- 4.3 This policy requires the full co-operation of management and staff at all levels.

## **5.0 Head Master's Duties**

- 5.1 Principal requirements of Regulation 4 of CAWR  
The CAW Regulations as a whole impose requirements for the protection of employees who might be exposed to asbestos at work and of other persons who might be affected by such work; and impose certain duties on employees concerning their own protection from such exposure. Since 2002 there has also been a specific duty to manage asbestos in non-domestic premises. This means that people with repair and maintenance responsibilities for non-domestic premises will need to ensure that asbestos-containing materials (ACMs) within those premises are properly managed, and that information about the location and condition of the materials is passed on to those likely to disturb them.

5.2 This policy describes the principal requirements of the new duty to manage asbestos in non-domestic premises. But duty holders will need to refer to the detailed instructions on the management of asbestos in non-domestic premises given in the Approved Code of Practice (L143) and in the Comprehensive Guide (HSG227) listed at Paragraph 2 when seeking to comply with this Regulation.

5.3 There is also a duty to prepare procedures, provide information and establish warning systems to deal with an emergency in the workplace related to the use of asbestos in a work process or the removal or repair of asbestos-containing materials.

## **6.0 Employees Duties**

6.1 Asbestos is hazardous to employees and others if asbestos fibres are inhaled. The formation of airborne asbestos fibres can be prevented if asbestos-containing materials in the premises are maintained in good condition and not damaged. This can be achieved if employees:

- do not carry out any work (even small jobs such as installing computers or shelving) on the fabric of the premises without consulting the nominated person (Site Manager).
- do not work on asbestos-containing materials without carrying out an assessment of the risk.
- follow the written plan of work.
- report any damage to, or deterioration of, asbestos-containing materials and any incidents that occur during work with asbestos.

## **7.0 Selection & Control of Contractors to Work on Asbestos-containing Materials**

7.1 When contractors are engaged to work on the premises, adequate steps will be taken to ensure the contractors are competent and have sufficient skills and knowledge to do the job safely and without risks to health.

7.2 Only contractors licensed by the HSE will be used for the removal of asbestos-containing materials, unless the work involves the removal of materials in which:

- asbestos fibres are firmly linked in a matrix
- the exposure during the removal process is likely to be sporadic or of low intensity.

7.3 Contractors hired to carry out building or allied trade work that will involve minor work with asbestos must comply with the Control of Asbestos at Work Regulations 2012.

## **8.0 Procedures for Dealing with Health and Safety Issues**

8.1 Where an employee raises a health and safety problem related to work with asbestos, the organisation will:

- take all necessary steps to investigate the circumstances
- take corrective measures where appropriate
- advise the employee of actions taken.

8.2 Where a problem arises relating to the condition of asbestos-containing material on the premises or during work with an asbestos-containing material, the employee must:

- inform a responsible person immediately, usually the Site Manager.
- in the case of an accident or emergency, respond quickly to ensure effective treatment.

## 9.0 Arrangements for Managing Asbestos

### 9.1 Managing the risk.

To manage the risk from asbestos in non-domestic premises, the Site Manager must assess whether or not there is or may be any asbestos anywhere in the premises. The Regulation states that in making the assessment, “*such steps as are reasonable in the circumstances shall be taken*”.

9.2 Everything that can reasonably be done must be done to decide where there is (or may be) asbestos in the premises and, if there is some (or may be some), to find out where it is or is likely to be. The condition of any asbestos that is, or has been assumed to be, present must also be considered.

9.3 Account must be taken of documentary evidence, such as the Asbestos Register, building plans or other relevant information, and of the age of the premises, and an inspection should be made of those parts of the premises which are reasonably accessible.

9.4 Material that looks as though it may contain asbestos must be treated as if it does unless there is strong evidence that it does not: which may include analysis or information from the manufacture or collected with the other records and documents.

## 10.0 Records and Drawings

10.1 Records or drawings that form a part of the asbestos survey/register will need be updated, or generated if they do not already exist, to include details of where the asbestos containing items (ACMs) are, their extent, condition, form (tiles, boards, insulation, etc), and what they look like (such as whether they are painted). The information gathered will help when assessing the risks to health arising from the material. This will be stored in the Site Manager’s office in the School House.

10.2 The records and drawings will need to identify those areas that have not been accessed and inspected and it must be assumed that they contain asbestos unless there is strong evidence that they do not.

10.3 The school’s Asbestos Register is located in the Site Manager’s Office in the School House and is readily available for reference by staff and contractors.

## 11.0 Risk Assessment and Management Plan

11.1 The Asbestos Register and other records with the locations and descriptions of any possible Asbestos Containing Materials (ACM) noted has been used to undertake an assessment of the risk from asbestos. Based on the findings of the risk assessment, a written management plan identifying those parts of the premises concerned must be prepared, and the measures which are to be taken for managing the risk must be specified in that written plan.

11.2 The plan should clearly identify those parts of the premises concerned, i.e., where ACMs are, or are liable to be present, and the measures that must be taken to ensure the risks are properly managed.

11.3 Managing the risk properly means making sure that as far as reasonably practicable no-one can come to any harm from asbestos on the premises and includes ensuring that any ACM is properly maintained or where necessary safely removed. People working in the building, including safety representatives should be consulted and informed as part of the risk management process.

11.4 The evaluation of the risk due to asbestos release requires:

- Identification of the asbestos material.
- Inspection of the material to assess dust release.
- Evaluation of the significance of any dust release, including measurement where appropriate.

- 11.5 Only competent persons authorised by the School may disturb asbestos to determine the information sought above.
- 11.6 In general, if asbestos materials are sound and undamaged, and there is no evidence of dust release, they may be left in place. Clearly label any materials containing asbestos with the asbestos warning sign and note its presence in the Asbestos Register. A sealing coat can be applied as an added precaution if the risk assessment determines that it is necessary.
- 11.7 If there is evidence of dust release, either from inspection or from dust measurement, it will be necessary to take further action to seal or remove the material. The main factors which need to be taken into account in deciding on a course of action are:
- The type and condition of the material
  - The frequency of disturbance or damage to the material
  - The amount of dust to be released
  - The use of the building
  - The difficulty and cost of sealing or removal
  - The cost of replacement, if required.
- 11.8 A control strategy, including both remedial and preventative measures will need to be developed for each case, based on an individual assessment of the above factors.

## **12.0 Making Information Available**

- 12.1 Information about the location and condition of any asbestos or ACM must be provided to every person liable to disturb it, and must be made available to the emergency services.

## **13.0 Review and Revision of Information Available**

- 13.1 The asbestos management plan must be reviewed and revised at regular intervals, and straightaway if there is reason to suspect that it is no longer valid, or there has been a significant change in the premises.

## **APPENDIX - GENERAL ADVICE**

14.1 It is not practical to give detailed instructions on how to deal with all the many different uses of asbestos materials that may be found in buildings. However, the following are key issues:

- Does the material contain asbestos and if so, how much and what type?
- Is the asbestos in a good or poor condition?
- Is there a possibility of asbestos dust release, in which case action must be taken to repair, seal, enclose or remove the material, as necessary.

14.2 Sealing or enclosing the material can help to prevent dust release, but any such work must be recorded, along with the presence of asbestos in building plans and the asbestos register. The material may be removed following approved safety procedures, but removal, and sealing in some cases, particularly of asbestos insulation and lagging, must normally only be done by a contractor licensed by HSE. In any case, no decision on removal should be made until the full assessment is completed.

14.3 Asbestos waste is a classified hazardous waste, is subject to the Special Waste Regulations and must be disposed of using the approved local procedure.

### **15.0 Identifying asbestos in premises**

15.1 Asbestos has been used in many building materials and these materials have been used for a variety of purposes. The first step in dealing with a suspected asbestos problem is therefore to check whether asbestos is present and if so, what type and approximately how much.

15.2 Unless the material carries an asbestos label or some other warning notice, a simple visual examination is not enough to determine whether it contains asbestos. The only way to determine whether a material is asbestos is by optical microscopy or XRD, SEM or TEM. Additionally, a check of the original building plans may show that asbestos-based materials were specified; the type and quantity of asbestos can then be checked with the original supplier if known. If the information is not available, it may be necessary to take samples of the material for analysis, but sampling itself can give rise to risks of exposure, and other means of identification should be tried first. In view of this, sampling should only be undertaken by accredited personnel. In the interim, it should be presumed that the material contains asbestos and act accordingly.

### **16.0 Inspecting asbestos in premises**

16.1 If the presence of asbestos is confirmed, Watford Grammar School for Boys will at some point have to be examined to determine whether asbestos fibres may be released.

16.2 There are a number of means by which dust can be released from asbestos materials:

- Any work which involves the use of power tools, breaking of the material or abrasion (e.g. maintenance, replacement or repair);
- Impact damage or abrasion caused by vehicles, people or movement of objects;
- Damage or disturbance by birds, rodents, vandalism or weathering. If friable (easily crumbled) material falls onto floors it may rapidly become broken up and dispersed;
- Vibration or mechanical movement of a surface, especially if the asbestos material is on the underside (e.g. internal insulation);
- Strong air currents can scour fibres from soft material such as lagging and sprayed coatings. Air movement caused by draughts or by forced air can release fibres and particular care must be taken to avoid blowing air over damaged surfaces;

16.3 If asbestos-containing material is loose and friable, damaged, or old and deteriorating, then it is reasonable to suspect that fibres are being released; a further indicator is if there is asbestos dust or debris in the immediate surrounding area. Undamaged bonded materials such as insulating board and asbestos-cement, especially if coated, are much less likely to release dust in normal use, but transient conditions such as those described above should also be investigated.

## **17.0 Sealing asbestos in premises**

17.1 Rigid asbestos materials such as insulating board or asbestos-cement (AC) may be sealed by painting.

17.2 When a higher degree of protection from damage is required a number of other sealing systems are available, including:

- Flexible or semi-flexible polymeric or bitumen coating
- Inorganic cement type coating
- Preformed sheets or panels.

17.3 The choice of sealing system depends on the nature of the asbestos material, the degree of damage protection required and any surface flammability requirements. Sealing asbestos insulation and lagging must normally be done only by a contractor licensed by the HSE.

17.4 Where asbestos insulation is being used for fire protection, it is important that the fire hazard is not increased by the use of combustible sealants. The sealed materials must meet the standard for spread of flame specified in the Building Regulations (as defined in BS 476). Normal paints may not achieve this standard and specially formulated sealants are available. Sealed asbestos should be checked regularly to ensure that the sealing is intact.

## **18.0 Removal**

18.1 When it is not possible to seal an asbestos material effectively or it is subject to frequent disturbance and likely to release dust, it may be decided to remove it completely. However, it should be recognised that removal will often lead to higher short-term dust levels than sealing the material in place, and approved procedures must be taken. A Project Manager, e.g. the School's Site Manager, is responsible for ensuring that the work is undertaken safely. The work will normally be undertaken by a specialist-licensed contractor, following a method statement. The safety precautions may include:

- An enclosure under negative pressure, with an airlock, under normal circumstances; the pressure should be monitored at regular intervals;
- Wet/damp methods, which in minor cases may involve a proprietary sealant water-based spray, e.g. Astrip, being used.

18.2 Any personnel undertaking the removal work should employ clean-as-they-go methodology, which should include the use of HEPA-filtered vacuum cleaners to remove dust from surfaces. In particular, it should be ensured that asbestos removal is effective, e.g. the use of wire wool on pipework. However, any such abrasive techniques must employ suitable dust suppression, e.g. saturation or use in conjunction with a type H vacuum cleaner.

## **19.0 Disposal**

19.1 Asbestos material is special waste and therefore must only be disposed of in accordance with approved procedures. The procedures should include, but not necessarily be limited to:

- Segregation of the waste whilst it is stored in the workplace and placing the item/s in a suitable container, e.g. double bagged, with the outer container being a red "asbestos waste" plastic bag.

- Use of a licensed waste carrier and disposal facility. Documentary evidence of correct disposal will be required, in order that the school can meet its Waste Management Duty of Care.

## **20.0 Typical locations of asbestos materials in buildings**

20.1 Thousands of tonnes of asbestos were used in buildings in the past and much of it is still in place. For example:

- Sprayed asbestos and asbestos loose packing - generally used as fire breaks in ceiling voids;
- Moulded or preformed sprayed coatings and lagging - generally used in thermal insulation of pipes and boilers
- Sprayed asbestos mixed with hydrated asbestos cement - generally used as fire protection in ducts, firebreaks, panels, partitions, soffit boards and ceiling panels;
- Insulating boards used for fire protection, thermal insulation, partitioning and ducts;
- Some ceiling tiles;
- Millboard, paper and paper products used for insulation of electrical equipment;
- Asbestos cement products, which can be compressed into flat or corrugated sheets.
- Corrugated sheets are largely used as roofing and wall cladding. Other asbestos cement products include gutters, rainwater pipes and water tanks;

20.2 The types of asbestos used were not limited to chrysotile (white) and, for example, crocidolite (blue) can still be found in certain textured coatings and thermoplastic floor tiles.