



Our People

Your safety

ASBESTOS POLICY



INVESTOR IN PEOPLE



Epping Forest
District Council

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1 APPLICATION

- 1.1 This policy applies to all buildings owned or occupied by Epping Forest District Council, including residential and commercial lettings.

2 POLICY STATEMENT

- 2.1 Epping Forest District Council, in recognition of its duties under the Health and Safety at Work etc. Act 1974 towards its tenants, employees, visitors, customers, contractors and members of the public, undertakes to manage all previously installed asbestos-based products responsibly and in accordance with relevant legislation.
- 2.3 The Council acknowledges the health risks presented by asbestos and will take all reasonable steps to reduce exposure to asbestos fibres to the lowest level reasonably practicable.
- 2.4 When an assessment of the material deems it necessary or as part of a planned removal process, removal of asbestos will be undertaken where necessary by a licensed contractor and to a licensed site.
- 2.5 The Council will only undertake to carry out works to any building, where there is a suspicion of asbestos being present, with adequate information on the nature, condition and extent of any installed asbestos based product likely to be disturbed.
- 2.6 The Council undertakes not to purchase or install any asbestos based products.
- 2.7 The Council will provide regular guidance and asbestos awareness training, in accordance with the Control of Asbestos Regulations 2006, for all employees likely to come into contact with asbestos during the course of their employment. All contractors will be required to show evidence through their health and safety policy of similar guidance and training for their staff who may be similarly exposed.
- 2.8 The Council will maintain a register of all identified and suspected asbestos-based products and locations within buildings it owns or occupies.
- 2.9 The Council will provide information to the occupier of its premises of locations where asbestos based products have been identified.
- 2.10 Health surveillance records will be maintained for every employee who is known to have been exposed to asbestos fibres which exceed the control limit, as defined by regulation 2(1) of the Control of Asbestos Regulations 2006, of 0.1 fibres per cubic centimetre of air averaged

over a continuous period of 4 hours. The record will be maintained on file for 40 years after the last entry.

3 RISK CLASSIFICATION SCHEME

3.1 Scoring System

The scoring system is an aid to help assessors to quantify the risk associated with any asbestos containing materials in Council premises and to identify the most appropriate action to effectively manage those risks. Persons undertaking the assessment will have received training in non-licensable asbestos work within the previous 12 months.

3.1.1 Position

This is divided into three levels with ratings to express the relative risk of asbestos fibres being released into the immediate environment and available for inhalation. Fibres liberated into the open air attract a score of zero to account for the dilution factor; those in internal non-residential areas, which are in confined spaces, are scored as one. Examples of internal non-residential areas include lift motor rooms, tank rooms, corridors, landings and common stairways. All internal occupied areas are scored as two.

3.1.2 Condition

Condition is a measure of the physical condition at the time of the survey i.e. cracked, broken or punctured. Where the potential risk of fibre release is unlikely, then the condition should be scored as good.

Good: Material is intact, shows no sign of deterioration and is undisturbed.

Fair: Visual assessment and tests indicate that the material is breaking up into layers or becoming loose from the substrate. There may be signs of accidental or intentional damage.

Poor: The material is non-cohesive, pieces are dislodged and debris in the area is evident.

3.1.3 Damage Potential

Potential for future damage is a measure of potential accidental or vandalism damage or the requirement for maintenance work involving disturbance e.g. frequent removal of a service duct panel. The system allows a score of two for high damage potential, one for medium, but if no damage is considered likely e.g. the product is out of normal reach it should be considered as low and scored as zero.

Low: Building occupants cannot contact the material. Maintenance is not required for the ducts; piping or electrical systems near the asbestos material.

Medium: The material is contacted only during abnormal activity such as infrequent maintenance or repair, building occupants rarely touch the materials.

High: The material is contacted frequently due to routine maintenance and/or the building occupants can contact the material during normal activity.

3.1.4 Friability

This relates to the ability of the material (ignoring its current condition) to release fibres into the surrounding atmosphere. This is a critical issue; therefore the scores range from zero to five (see table).

3.1.5 Surface Treatment

This relates to the effectiveness of the seal over the product. Painted asbestos is effectively sealed, if the seal is damaged it should be scored as incomplete, however, if it is unsealed or badly damaged it should be considered as no effective seal. Papered asbestos panels should be considered as an incomplete seal to reflect the possible fibre release during the removal of the wallpaper in the future (see table).

3.1.6 Product

The score relating to the product takes into account the asbestos content and the composition of the binding material. Textured coatings e.g. artex, thermoplastic flooring and vinyl tiles contain only traces of asbestos fibre and the binder effectively prevents their release (see table).

The scheme provides a risk classification only, there is no score, which will automatically result in removal of the asbestos. Conversely there is no “safe” score that will confer absolute freedom from risks to health.

Asbestos Risk Classification Scheme							Score
Position	External	0	Internal (public areas)	1	Internal (occupied)	2	
Condition	Good	0	Fair	2	Poor	4	
Damage Potential	Low	0	Medium	1	High	2	
Friability (Softness)	Low	0	Medium	2	High	5	
Surface Treatment	Sealed	0	Incomplete seal	1	No effective seal	4	
Product	Sprayed Coatings	6	Asbestos Cement	1	Textured Coatings	0	
	Lagging	4	Gaskets	1	Thermoplastic flooring	0	
	Asbestos insulating board	4	Reinforced plastic products	0			
Total Score							

4 ACTION

- 4.1. Upon completion of the assessment an action plan will be prepared based on the findings of the assessment.
- 4.2. Material which scores 12 or more in the risk classification scheme should be considered for prompt removal. Removal may only be undertaken by an approved licensed contractor.
- 4.3. Material which scores between 7 and 11 should be considered for removal and for possible remedial work. If the material is not removed it will be managed in accordance with section 6 of this document.
- 4.4. Material which scores 6 or less will be managed in accordance with section 6 of this document.

5 BULK SAMPLING OF SUSPECTED ASBESTOS CONTAINING MATERIALS

- 5.1. All bulk sampling must be conducted in accordance with HSE publication HSG264, The Asbestos Survey Guide. All persons carrying out sampling must have received training for non-licensable asbestos work within the previous 12 months and must have carried out a risk assessment of their technique to ensure the health and safety of themselves and others. The appropriate personal protective equipment must be worn.
- 5.2. All sampling points must be recorded with the location, date and the initials of the sampler. Sprayed coatings and pipe lagging sample sites must be filled and covered with adhesive tape, insulating board must be repaired with filler such that they do not present an additional risk of fibre release. Sampling points may be marked on a sketch plan associated with this sample record.
- 5.3. The number of samples taken must be representative of the suspect material:
 - 5.3.1. Sprayed coatings will be sampled once every 10 – 15 sq. metres, or if the area exceeds 100 sq. metres, one per 25 sq. metres. At least one sample should be taken from wherever the material is patched or repaired. Samples should be approx. 5 sq. centimetres through the entire depth of the coating.
 - 5.3.2. Pipe lagging will be sampled every 3 metres or more frequently if the insulation obviously changes, for long pipe runs a sample every 6 metres will be sufficient. Attention must be given to the elbows and valves where the insulation may be different to the main pipe run of the pipe. Samples must be taken as a core of approx. 5 sq. centimetres to the full depth of the insulation. Boilers and calorifiers must be sampled at least twice – on the top and at the side. Any patched or repaired areas must be sampled.
 - 5.3.3. Insulating boards must be sampled whenever the suspect material appears to change, and at least every 25 sq. metres in the case of suspended ceilings. Individual duct panels will be sampled if obviously different or if there is evidence of repair. All samples must be taken from near the edge of the sheet to allow easy repair with filler.
 - 5.3.4. Asbestos cement should be sampled once per roof or run of guttering unless it obviously changes in visual appearance.
 - 5.3.5. Textured coatings must be sampled twice every 25 sq. metres.

- 5.3.6. One sample of each colour thermoplastic floor tile must be taken per room or location in which they are laid.
- 5.4. Where the sampling officer considers that bulk sampling at these rates will damage the integrity of the material and is unnecessary, fewer samples may be taken and this must be indicated in the survey report.
- 5.5. Samples will be sent in an approved fashion to a United Kingdom Accreditation Service (UKAS) accredited laboratory.
- 5.6. Records of samples will be held by the Housing Directorate in respect of materials in Council owned Housing Stock and by Facilities Management, Corporate Support Services in respect of materials in all other Council owned or occupied premises.

6 MANAGEMENT OF ASBESTOS CONTAINING MATERIALS

- 6.1. It will not normally be necessary to further seal, enclose or remove materials containing asbestos, which are sound, undamaged and not releasing dust. These should be risk assessed, recorded, left in place and managed.
- 6.2. Only asbestos containing materials which have been surveyed and classified as low risk will be considered suitable for management.
- 6.3. Where undamaged asbestos containing materials are left in situ, the occupiers of the building must be advised in writing of its location and given guidance on works that may and those that must not be carried out on the material. Where the occupancy of the building changes, new occupants must be similarly advised. A warning label will be applied to the material where practicable or a list of asbestos sites posted in a suitable location (e.g. a boiler cupboard in tenanted housing).
- 6.4. The presence of the asbestos containing material must be included on the asbestos register, this must be updated as removal is carried out. All materials which are in good condition must be periodically re-inspected to ensure that the condition of the material has not changed. The inspection will be visual avoiding unnecessary disturbance or fibre release and will not involve the covering material, e.g. duct panels or ceiling tiles. The frequency of the inspection will be based on the periods as follows:

Sprayed asbestos coatings	every year or on reported damage
Pipe Lagging	every year or on reported damage
Insulating board	every ten years or on reported damage

Cement Sheet	on reported damage only
Textured Coatings	on maintenance works only
Vinyl flooring	on maintenance works only
Reinforced plastics	on maintenance works only

The actual periods will however be risk based and depend upon position and activity in the area.

- 6.5. The appropriate manager will be responsible for the inspection of the materials within their premises
- 6.6. To comply with regulation 10 of the Construction (Design & Management) Regulations 2007, any information that is held on substances harmful to health, including asbestos will be included in the information given to designers and to the CDM co-ordinator for inclusion in the pre-tender health and safety plan and should therefore be included in the information given to the contractor at tender stage. A warning that not all materials containing asbestos may have been identified should be incorporated with clauses under the general heading "Asbestos Policy".
- 6.7. Asbestos Awareness training will be given to all staff who may come into contact with asbestos containing materials in the course of their work.
- 6.8. If, on inspection any material containing asbestos is found to be damaged or has deteriorated it will be reassessed and reclassified and appropriate action taken. This will be the responsibility of the Line Manager to put into effect.

7 MANAGEMENT OF WORK WITH ASBESTOS MATERIAL

- 7.1 Where asbestos containing materials need to be removed, Consultants, Project Managers or Supervisors who have the ability or responsibility to influence the manner in which work with asbestos is conducted must be competent.
- 7.2 Air monitoring will be carried out during any work where asbestos based materials may be disturbed. All consultants employed by the Council to conduct air monitoring must be accredited by UKAS for the collection of samples and fibre counting.
- 7.3 Any contractor or employee selected to work with asbestos containing materials must be positively informed of the presence of asbestos as recorded in the asbestos register. The contractor or department will then be expected to prepare an assessment and plan of work. The assessment and plan of work must be in writing and submitted to the

- 7.4 client-instructing officer who may take advice from the Council Safety Officer. Written approval of the assessment and plan of work must be obtained from the client-instructing officer before commencement of any work with asbestos. Generic assessments and plans of work are acceptable for repetitive tasks carried out with in the same manner in similar locations and do not need individual approval. NB This is in addition to any statutory notification required of the contractor.
- 7.5 Where the work method is varied due to a changed specification or an instruction to carry out additional works, an amended assessment and plan of work must be prepared and approved by the client-instructing officer before commencement of any works with asbestos.
- 7.6 Any contractor working in close proximity to an asbestos containing material must carry out an assessment of the potential for fibre release during the normal course of the works and for any reasonably foreseeable accidents. This must include the precautions and control measures proposed to prevent any fibre release. The assessment and plan of work must be in writing, effectively communicated to the operatives concerned and be available for inspection on site where the work is being undertaken. Generic assessments are acceptable for repetitive tasks carried out in the same manner in similar locations.
- 7.7 All contractors carrying out work with any asbestos-based product in any building to which this policy applies must keep a health & safety file for the activity on site. The file should be kept available for inspection and a copy provided to the council at the end of the maintenance period.
- 7.8 All contractors who propose to carry out any work on any asbestos containing materials must hold a licence issued by the Health & Safety Executive in accordance with Regulation 8 of the Control of Asbestos Regulations 2006 unless the work is non-licensable as defined by Regulation 3(2). In general, non-licensable works are those where exposure of employees is sporadic and of low intensity; and where it is clear from the risk assessment that exposure of any employee to asbestos will not exceed the control limit.
- 7.9 Client side supervisors or enforcement officers must not enter any asbestos stripping enclosure. Licensed contractors are expected to provide evidence of enclosure integrity tests. A competent consultant must carry out any gathering of evidence within an enclosure for contractual or enforcement reasons. In-house staff are not equipped to the necessary standard to enter asbestos enclosures.

- 7.10 All work to asbestos insulating board in occupied areas will be considered licensable work as defined by the Control of asbestos Regulations 2006 and require the appropriate controls to apply.
- 7.11 All Housing Repairs Service operatives who may carry out work on buildings (usually through works orders) must be instructed in writing that if they come across any material they suspect to be asbestos which has not been notified to them in advance, they will stop and report to their supervisor. Any new staff will also be formally instructed.
- 7.12 Works orders system will link to the asbestos register and indicate any known asbestos on the works orders for that premises.
- 7.13 All employees who may be required to carry out work on asbestos containing materials, including sampling suspected asbestos containing materials, will receive annual training for Non-licensable Asbestos Work. No employee under 18 years of age will carry out work on asbestos containing materials.
- 7.14 All licensable work on asbestos containing materials will be out sourced to licensed contractors.

8 EMERGENCY PROCEDURES AND UNCONTROLLED RELEASE

- 8.1. In the event of any member of staff inadvertently damaging a product thought to contain asbestos the following procedure will apply
 - § Evacuate other occupants, leave the room, or the immediate area, close the door and switch off all ventilation equipment.
 - § Inform the local manager and their line manager. Place a sign on the door to keep out or lock it.
 - § The local manager will then refer to any premise records to determine if the product contains asbestos. If there is any doubt, the manager will contact the Council Safety Officer who will assist in the management of the incident.
 - § The Council Safety Officer will co-ordinate with the manager any necessary investigations and advise on any remedial works in association with any appointed asbestos consultant.

9 REVISION AND AUDIT

- 9.1. All generic assessments and plans of work produced by contractors must be revised at intervals of not more than two years and in any case following changes in legislation or best trade practice.
- 9.2. Compliance with the protocol will be monitored by the Council Safety Officer who will respond to any serious breaches and report them to the Corporate Safety Team.
- 9.3. This policy will be revised at intervals of not more than two years or when there are significant changes in legislation or best practice. The Council Safety Officer will ensure this policy is kept under periodic review, at least every two years, and update it as necessary to reflect changes in legislation and best practice.

10 STAFF CONSULTATION

Staff will be consulted using the recognised trade unions and the Corporate Safety Team and procedures set up within the safety manual. Consultation will occur on any matter involving asbestos which has the potential for affecting staff health and safety. Consultation is not required, (but may still occur), for treatment of asbestos in any individual case where the treatment has been decided in accordance with this policy.