



Brentwood Borough Council Housing Department Asbestos Management Policy

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Version Control

Version	Date of change	Officer	Title
V1	20/11/2020	Johanna Batchelor-Lamey	Compliance Manager

1.0 ASBESTOS MANAGEMENT

1.1 Introduction

This Asbestos Management Policy is intended to make Duty Holders, Estate Management, Employees, Caretakers, Contractors and Residents, aware of the risks from asbestos and to ensure that, Brentwood Council complies with the requirements the Health and Safety at Work etc. Act 1974, the Control of Asbestos Regulations 2012, the Approved Code of Practice L143 Managing and Working with Asbestos and HSG 264 Asbestos: The Survey Guide.

This document incorporates the asbestos management plan and lays down operating procedures, areas of responsibility and offers information and guidance to Duty Holders to assist them to control, monitor and minimise any risk of exposure to asbestos.

1.2 Policy Aims:

Brentwood Borough Council shall, as far as is reasonably practicable:

- Take reasonable steps to find out if there are materials containing asbestos in non-domestic premises, and if so, its quantity, location, and condition.
- Presume materials contain asbestos unless there is strong evidence that they do not
- Produce and keep up to date, a record of the location and condition of the asbestos-containing materials - or materials which are presumed to contain asbestos
- Assess the risk of anyone being exposed to fibres from the materials identified
- Prepare an Asbestos Management Plan that sets out in detail how the risks from these materials will be managed
- Ensure that employees and anyone carrying out work on its behalf must attend the mandatory asbestos awareness training as a minimum and records are retained. Also, sufficient information, instruction, and training is provided, so that all persons who have the potential to release asbestos fibres are aware of the precise risk and in relation to the nature and location of asbestos. This includes Brentwood Council employees, contractors, consultants, suppliers, and residents.
- Establish and maintain an Asbestos Register and ensure that it is fully maintained and updated with the location and analytical identification of the type and condition of asbestos, and details any asbestos removed on each site,

1.3 Policy Objectives

1.3.1 Monitor and maintain the condition of identified ACMs as assessed and recorded in the Asbestos Register.

1.3.2 Identify and categorise ACMs, assess risk to health using standard algorithm ratings and manage hazards accordingly.

1.3.3 Develop and prioritise a programme for the remediation of ACMs that (because of their location and/or condition), present an actual or perceived risk to health, this is to be in conjunction with major works.

1.3.4 Incorporate a risk reduction programme through removing asbestos, as reasonably practicable and managing remaining ACMs in a proactive manner.

1.3.5 This policy will be reviewed every 2 years unless there is a legislative change.

2.0 Regulations

2.1 Relevant legislation and documents

The main legislation and documents relating to this Asbestos Management Policy are listed below.

- **The Health and Safety at Work etc. Act 1974:**
This is the parent legislation providing the framework for all subsequent legislation for this policy
- **The Management of Health & Safety at Work Regulations 1999:**
These regulations address Health and Safety issues specifically in the workplace, affecting the workforce and third parties. This is where the requirement for risk assessment is set out.
- **The Control of Asbestos Regulations 2012:** These regulations are wider than just the workplace. They prescribe that organisations must have a management plan.
- **The Construction (Design & Management) Regulations 2015:**
These regulations are not specifically about asbestos but set out regulations about the management of construction projects on Council sites.
- **Approved Code of Practice L143 Work with Materials Containing Asbestos**
The Control of Asbestos Regulations 2012.
- **HSG 264 Asbestos: The Survey Guide** - Surveying, Sampling, and assessment of Asbestos Containing Materials. This guide details the surveying requirements and processes
- **Reporting of Injuries, Diseases and Dangerous Occurrence Regulations (RIDDOR) 2013**

3.0 Key Responsibilities

The heaviest exposure occurs especially where asbestos has not been identified or during repair, maintenance, or is being removed during renovations or demolitions. The following above regulations were brought in to reduce the exposure and risk where possible and, to further protect the health and safety of those most at risk. To comply with this policy, certain

Brentwood Council employees, partnering contractors and residents/leaseholders will have key responsibilities.

These include:

- Brentwood Borough Council, is the Duty Holder and owner
- Chief Executive, is the Delegated Duty Holder
- Director of Housing and Enforcement, is the Deputy Delegated Duty Holder
- Housing Manager & Estates Management Team Leader
- Repairs & Maintenance Contracts Manager
- Compliance Manager
- Compliance Officer
- Data Administrator
- Technical Officers - Voids
- Estate Management Officers
- Caretakers
- Contractors – Axis, Surveys and Removals
- Council Tenants

Duties included in each role are as defined below:

Brentwood Borough Council (Duty Holder)

3.1 Brentwood Borough Council is a 'Duty Holder' as defined within Regulation 4 of the Control of Asbestos Regulations 2012 (CAR).

Chief Executive (Delegated Duty Holder)

3.2 The Chief Executive is the Delegated Duty Holder; Brentwood Council has responsibility to do the following:

- A competent person(s) or organisation is appointed to provide technical and professional support and advice.
- Sufficient funding is made available to discharge the responsibilities the BBC has under the Regulations
- The Asbestos Management Plan (AMP) is produced setting out the measures and arrangements the Council has in place to discharge its duties under the Control of Asbestos Regulations 2012.
- Roles and Responsibilities for Key Officers and Managers are set out in the AMP
- All persons having a defined role within the AMP or having responsibility for assisting the Council to discharge its duties received appropriate training and instruction.
- That clear procedures and protocols are in place to support the Council in discharging its duties.
- That breaches of its duties or written procedures are fully investigated and action taken to review procedures to prevent a recurrence.
- An annual Review of performance will be undertaken, and a report provided for the 'duty holder' and Asbestos Steering Group.

Director of Housing and Enforcement (Deputy Delegated Duty Holder)

3.3 As Deputy Delegated Duty Holder, the Director of Housing and Enforcement has responsibility to do the following:

- Enable the implementation of the management plan to ensure that working arrangements and provisions of financial, technical, human, and other resources are suitable and sufficient to meet its requirements.
- All buildings, **managed by BBC**, and habited by staff, or tenants have been surveyed for the presence of asbestos and an Asbestos Register produced identifying, so far as reasonably practicable, the locations of ACMs and their risk status.
- The AMP will be periodically audited to ensure it is fully implemented and functioning effectively.
- Active monitoring of procedures and protocols will be undertaken as prescribed in the AMP.
- The AMP will be reviewed annually to ensure it tracks any legislative or organisational changes and remains fit-for-purpose.

Housing Manager & Estates Management Team Leader

3.4 The Housing Manager & Estates Management Team Leader has responsibility to do the following:

- Ensuring suitable training is given to appropriate Council Housing employees.
- Enable, as far as reasonably practicable, all personnel within their control, including contractors, residents and visitors are fully informed of any potential asbestos hazards in the areas they live, work and visit.
- Identifying training requirements for all Council Housing employees under their control, to ensure that they are competent to fulfil the requirements of their roles and responsibilities.
- To assess the competence and qualifications of the Approved Asbestos Contractors to HSG264 regarding asbestos surveys and asbestos removal work is licenced by the HSE.

Repairs & Maintenance Contracts Manager

3.5 The Repairs & Maintenance Contracts Manager has responsibility to do the following:

- Ensuring that all Council Housing employees within their control, including contractors, residents and visitors are fully informed of any potential asbestos hazards in the areas they live or work and visit.
- Assisting and advising staff, wherever possible, to enable them to meet their delegated responsibilities under this Asbestos Management Plan.
- Any analysis of asbestos is undertaken by a laboratory that has a current UKAS certificate.

Compliance Manager

3.6 The Compliance Manager has responsibility to do the following:

- Day to day asbestos management in conjunction with the Compliance Officer.
- The implementation of the asbestos management plan
- Assisting and advising staff, wherever possible, to enable them to meet their delegated responsibilities under this Asbestos Management Plan.

- Ensuring the Asbestos Contractors are complying with all legislation and health and safety advice regarding all aspects of asbestos work, in conjunction with the Corporate Health & Safety Advisor.
- Monitoring surveying KPIs to ensure they are meeting targets.

Compliance Officer

3.7 The Compliance Officer has responsibility to do the following:

- Reviewing risk assessments received by the Approved Asbestos Contractor and directing action according to recommendations of the asbestos survey.
- Ensuring all works have been completed and records are retained.

Data Administrator

3.8 The Data Administrator has responsibility to do the following:

- Creating and keeping up to date an asbestos register for all Brentwood Councils housing properties.
- Report to the Compliance Manager the survey targets.
- Produces asbestos surveying targets and reports this to the Asbestos Steering Group.
- Ensuring that all housing properties and communal areas are surveyed on a regular basis.
- Ensuring upload of full records of asbestos removal works into the Asbestos Register
- Make readily available all relevant asbestos information to employees, contractors, to enable them to effectively manage the risk of asbestos exposure on the site under their control (contractors also have responsibility to access asbestos information).
- Ensure the Asbestos Register is kept fully up to date.

Technical Officers – Voids

3.9 The Technical Officers – Voids has responsibility to do the following:

- To follow the set protocol for managing asbestos within vacated housing accommodation to ensure the risk from asbestos containing materials is minimised. (refer to the Asbestos Process for Void Housing Properties in the Y drive.)

Estate Management Officers

3.10 The Estate Management Offices has responsibility to do the following:

- When undertaking estate inspections, or liaising with tenants in their accommodation, officers will be mindful of asbestos containing material and, will inform the housing Compliance Officer of any damaged or deteriorating asbestos containing materials.

Caretakers

3.11 The caretakers has responsibility to do the following:

- When undertaking caretaking duties will be mindful of asbestos containing material, and will inform their line manager and the housing Compliance Officer of any damaged, dumped or deteriorating ACMs.

Contractor – Axis (Non-licenced)

3.12 The Contractor – Axis has responsibility to do the following:

- Compliance with current legislation, associated Approved Codes of Practice (ACoPs) and Guidance, also adhering to the Council Asbestos Management Plan, and any other relevant procedures.
- Management and monitoring of the asbestos removal process, but to a level which would not fall to be licenced with the HSE.
- Identification of training requirements for all personnel under their control, to ensure that they are competent to fulfil the requirements of their roles and responsibilities, asbestos awareness training being a mandatory requirement and additional suitable and sufficient training for those working with asbestos containing materials.
- Fully communicating with all personnel who may be affected about the location of and risk associated with any Asbestos Containing Materials in the property in question.
- Immediate cessation of works if unsuspected Asbestos Containing Materials are discovered and reporting to the Council's Housing Compliance Manager for advice/action before proceeding.
- Attending site in advance of works with a designated Housing Council Officers to assess the asbestos remedial works specifications.
- Raising any issues to the Council's Housing Compliance Manager relating to the health and safety aspects or additional costs of the project.
- Ensuring that all asbestos removal works are carried out in strict accordance with the Control of Asbestos Regulations 2012 and its supporting ACoP L143 Work with Asbestos Materials and including any subsequent revisions to these documents.
- Provision of a plan of work to the Approved Asbestos Contractor and the Council's Compliance Manager, including details of project resources, timetable and agreed emergency procedure
- Provision of Statutory Notices to the relevant Statutory Authority (HSE) prior to commencing asbestos works, or, by agreement and at the request of the Approved Asbestos Contractor, applying for a waiver from the minimum notice.
- Regularly inspecting the work environment and reporting immediately any defects to the Council's Housing Compliance Manager, and where instructed rectifying the defect.
- Provision of copies of notification and consignment notes and other relevant documentation with a final account to the Council's Housing Data Administrator for recording under Keystone.

Contractor – Surveys

3.13 The Contractor – Surveys has responsibility to do the following:

- Take reasonable steps to locate and identify the presence of Asbestos Containing Materials in its assets. This role has been assigned to an Approved Asbestos Competent Contractor who will carry out surveys of properties according to a planned programme.
- Compliance with current legislation, associated Approved Codes of Practice (ACoPs) and Guidance, also adhering to the Council Asbestos Management Plan, and any other relevant procedures.

- Undertaking Management, and Refurbishment or Demolition asbestos surveys on Council stock, where necessary synchronised with planned programmes.
- Following HSG 264 guidance about displaying of floor plans within communal areas.
- Ensuring information about all identified Asbestos Containing Materials for all Council Housing properties is passed to the Council Housing Data Administrator for inclusion on the Asbestos Register database (Keystone System).
- Provision of advice to the Council about any potentially high-risk asbestos related products identified during the survey, via the quickest practicable means and followed up in writing.
- Inform Brentwood Council of any changes within the industry which may affect policy or practice.
- Identification of training requirements for all personnel under their control, to ensure that they are competent to fulfil the requirements of their roles and responsibilities, asbestos awareness training being a mandatory requirement for all staff and additional suitable and sufficient training for those working with Asbestos Containing Materials.
- Carrying out a risk assessment before commencing any work to establish the risk associated with potential Asbestos Containing Materials in the property.
- Asbestos Surveyors must be accredited by the United Kingdom Accreditation Service (UKAS) as complying with ISO17020 to undertake surveys for Asbestos Containing Materials
- Surveying organisations are required to have for the duration of the contract Public, Employer's and Professional Indemnity insurance to appropriate levels of £10 million.
- Analysing and air sampling is carried out effectively by the chosen analyst prior to re-occupation of any area where works have been carried out.

Contractor – Removals (Licenced)

3.14 The Contractor – Removals (Licenced) has responsibility to do the following:

- Compliance with current legislation, associated Approved Codes of Practice (ACoPs) and Guidance, also adhering to the Council Asbestos Management Plan, and any other relevant procedures.
- Identification of training requirements for all personnel under their control, to ensure that they are competent to fulfil the requirements of their roles and responsibilities, asbestos awareness training being a mandatory requirement and additional suitable and sufficient training for those working with asbestos containing materials.
- Carrying out a risk assessment before commencing any work to establish the risk associated with potential Asbestos Containing Materials in the property.
- Where the above risk assessment indicates it is necessary to access the Asbestos Register (Keystone database) to view the relevant survey, or where there is no survey to require a refurbishment and demolition survey to be carried out before commencing work.
- Fully communicating with all personnel who may be affected about the location of and risk associated with any Asbestos Containing Materials in the property in question.

- Immediate cessation of works if unsuspected Asbestos Containing Materials are discovered and reporting to the Council's Housing Compliance Manager for advice/action before proceeding.
- Attending site complex asbestos removal in advance of works with a designated Housing Council Officer to assess with the asbestos remedial works specifications.
- Raising any issues to the Council's Housing Compliance Manager relating to the health and safety aspects or additional costs of the project.
- Ensuring that all asbestos removal works are carried out in strict accordance with the Control of Asbestos Regulations 2012 and its supporting ACoP L143 Work with Asbestos Materials and including any subsequent revisions to these documents.
- Carrying out enclosures and removal in accordance with HSG 247 - Asbestos: The Licensed Contractor's Guide.
- Provision of a plan of work to the Approved Asbestos Contractor and the Council's Compliance Manager, including details of project resources, timetable and agreed emergency procedure
- Provision of Statutory Notices to the relevant Statutory Authority (HSE) prior to commencing asbestos works, or, by agreement and at the request of the Approved Asbestos Contractor, applying for a waiver from the minimum notice.
- Regularly inspecting the work environment and reporting immediately any defects to the Council's Housing Compliance Manager, and where instructed rectifying the defect.
- Provision of copies of notification and consignment notes and other relevant documentation with final account to the Council's Data Administrator for recording under Keystone.

Council Tenants

3.15 Council Tenants have responsibility to do the following:

- The Council will endeavour to provide a diagram showing assumed potential asbestos containing materials in their accommodation.
- All Council Housing buildings, managed by BBC and habited by Council tenants are surveyed for the presence of asbestos, and an Asbestos Register produced identifying, so far as reasonably practicable, the locations of ACMS and their risk status.
- Immediate reporting to the Housing department any asbestos containing materials which are damaged or disturbed, or any suspect ACMs of any condition, any defects, or concerns, that may have related to asbestos or remedial works.
- Prevent from drilling into any of the walls, floors, or ceilings before undertaking any major works and to seek the Council's permission to do so.
- Information and awareness of asbestos is given to all Council Tenants through the Tenant Liaison Group

4. Asbestos Information and Training

All employees who are liable to disturb asbestos during their normal everyday work activities should be provided with adequate information, instruction, and training so that they can recognise asbestos containing materials. The training needs to be appropriate for the work and the roles undertaken by individual employees.

Asbestos awareness training is **mandatory** for all Council employees who may come into contact with or may disturb asbestos in the course of their job activity, manage buildings or who may influence how work is carried out. This should form part of the employee's induction training programme to enable them to carry out their daily work activities with minimal risk to their health and safety. Refresher training for employees will consist of an E-learning presentation biennially to enable employees to familiarise themselves again with the requirements of asbestos and their awareness in their role. This applies to current employees.

The Asbestos Awareness training aims to balance the technical aspects of asbestos with the practical management using "real life" scenarios in small groups to facilitate discussion and questions. It will cover the Control of Asbestos Regulations 2012 and our continued obligations as a landlord to inspect common parts & manage works safely and keep good records.

Additional Training

4.1 Employees whose work could foreseeably expose them to asbestos or who may be involved in managing asbestos programmes of work or any other asbestos related work will also be required to attend relevant additional training.

4.2 This will be the responsibility of Brentwood Borough Council to arrange P405 (Management of Asbestos in Buildings) training.

4.3 Brentwood Borough Council endeavours to have at least one member of the Repairs & Maintenance team that has attended this additional training and can advise others where necessary.

**Appendix 1 - Asbestos Management Plan
Management of Asbestos Flow Chart**

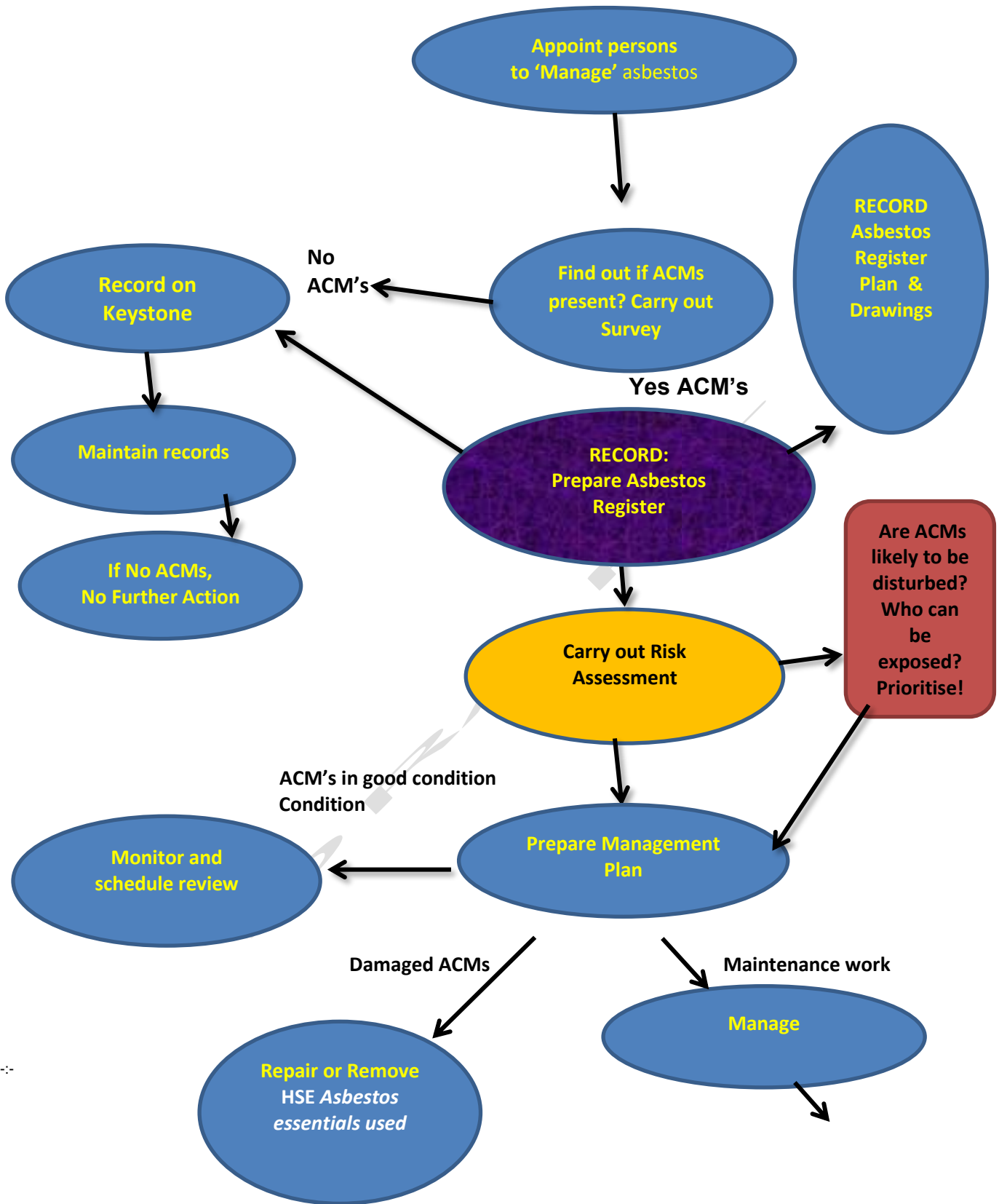


Figure 2: Health and Safety Executive

- Train staff
- Manage contractors
- Checked all work against plan/register
- Control of work itself:
- HSE *Asbestos essentials used*
- Compliance achieved

Appendix 2 – The identification of Asbestos Containing Materials

Asbestos is a naturally occurring fibrous mineral which has been used for its fire resistance, thermal insulation, and reinforcement properties. The main commercial types have been crocidolite (blue asbestos), amosite (brown asbestos) and chrysotile (white asbestos).

Since the discovery in the mid-Twentieth Century that asbestos can cause fatal lung conditions, the mining and use of asbestos has decreased, and has become closely regulated in most countries, with the UK banning the use of Crocidolite and Amosite in 1985 and Chrysotile in 1999.

It is the aim of the Council to minimise the risk of employee or contractor exposure to asbestos fibres in any form, irrespective of the type of asbestos found.

Asbestos Containing Materials (ACMs) have been put to many uses over the past century. The commercial use of asbestos in the UK began around the end of the nineteenth century and increased gradually until World War II. Immediately after World War II, large quantities of asbestos were used, particularly for new 'system-built' buildings in the 1950s, 1960s and early 1970s. ACMs were routinely used in the refurbishment of older buildings.

The most common areas where asbestos can be found in buildings include:

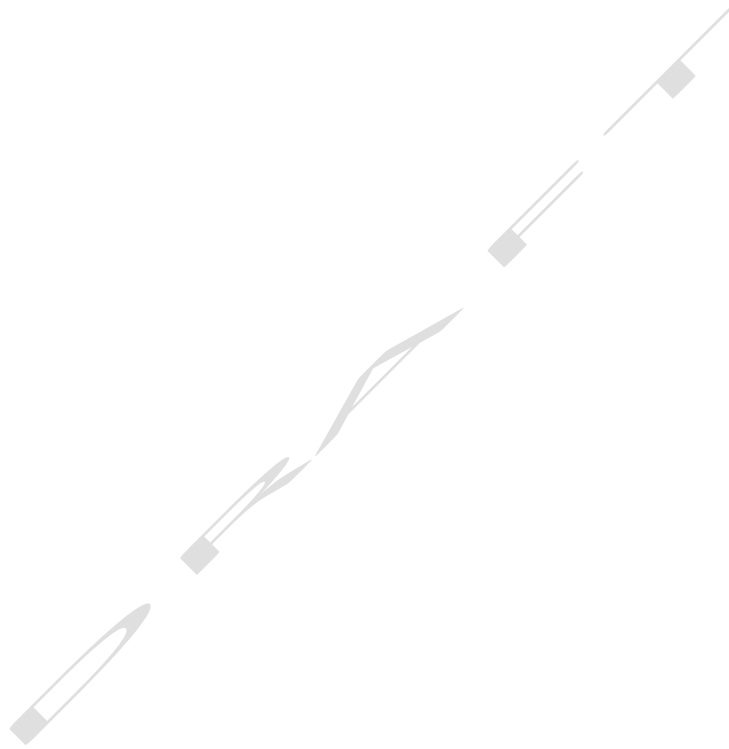
- loose packing between floors and in partition wall
- sprayed ('limpet') fire insulation on structural beams and girders
- lagging e.g. on pipework, boilers, calorifiers, heat exchangers, insulating jackets for cold water tanks, around ducts
- asbestos insulation board (AIB), e.g. ceiling tiles, partition walls, soffits, service duct covers, fire breaks, heater cupboards, door panels, lift shaft linings, fire surrounds
- asbestos cement (AC), e.g. roof sheeting, wall cladding, walls and ceilings, bath panels, boiler and incinerator flues, fire surrounds, gutters, rainwater pipes, water tanks
- other products, e.g. floor tiles, mastics, sealants, textured decorative coatings (such as Artex ceiling applications), rope seals, gaskets (e.g. pipework), millboards, paper products, fire doors, cloth (e.g. fire blankets), bituminous products (roofing felt, sink pads and flooring adhesive) and old plastic toilet cisterns and toilet seats.




















A Health and Safety Executive (HSE) guide for employees and contractors with pictorial information on where asbestos containing material can be found, in business/industrial and residential premises, is available at this link <http://www.hse.gov.uk/asbestos/assets/docs/beware-asbestos-reference-cards.pdf>

Below are some examples of pictures of the types of products where asbestos can be found. This is not a complete picture and competent advice should always be sought if unclear.

Some Examples of Asbestos Products

Remember - The presence of asbestos in the workplace does not automatically mean that it must be removed. Risks to health will only arise when asbestos fibres are released i.e. disturbed/damaged into the atmosphere. Therefore, asbestos containing materials (ACM) that are undamaged can sometimes be left in place.



			
Fire Blanket	Asbestos Insulation Board (AIB)	Perforated AIB ceiling tiles damaged around the light fitting	Suspended AIB ceiling tiles in a corridor
			
Asbestos containing floor tiles in a corridor	Asbestos cement downpipe, hopper and profile sheet	Pieces of AIB	Damaged asbestos panelling
			
Asbestos cement roof (damaged exterior)	Torn asbestos pipe lagging	Damaged asbestos lagging on hot water pipes	Damaged asbestos pipe lagging and debris
			
Pipe insulated using asbestos lagging and rope	Asbestos rope used as insulation on a pipe	Sprayed 'limpet' asbestos on the underside of an asbestos cement roof	Sprayed 'limpet' asbestos which has been partly removed
			
AIB window sill	Asbestos panelling inside heater cupboard	Asbestos panelling around gas meter	Asbestos ceiling textured coating

How Asbestos Can Affect Your Health

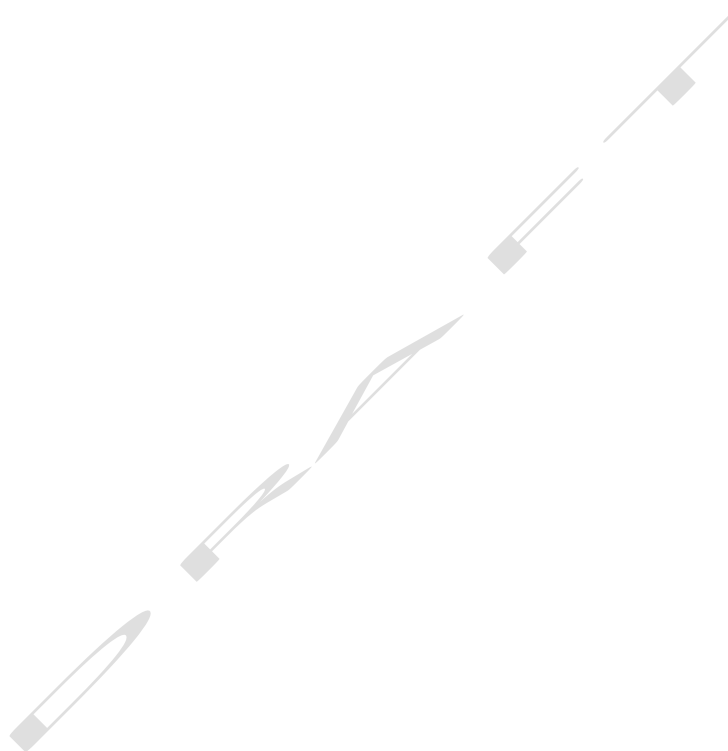
Breathing in air containing asbestos dust/fibres can lead to people developing one of three fatal asbestos-related diseases. In the UK asbestos fibres are present generally in the environment so that people are regularly exposed to very low levels of air borne fibres. However, a key factor in the risk of developing asbestos related diseases is in the total number of fibres inhaled so that working on or near damaged asbestos containing materials, or, inhaling high levels of asbestos

fibres (which may be many hundreds of times that of environmental levels), during building works for instance, can cause serious diseases:

- Asbestosis – which is a scarring of the lung
- Lung cancer
- Mesothelioma – which is a cancer of the lining around the lungs and stomach.

These diseases can take from 15-60 years to develop, from first exposure – so you or your employees would not be aware of any sudden change in health after breathing in asbestos.

Asbestos fibres enter your body when you breathe. The body can get rid of the larger fibres, but microscopic fibres can pass into the lungs where they can cause disease.



Appendix 3 – Surveys

Following an initial asbestos survey being carried out, a management plan must be produced, and this would be arranged by either the contractor engaged to carry out the survey, or the respective Council point of contact above. The Asbestos Management Plan highlights specific areas of a premise where asbestos has been found and what type it is. It also confirms the recommendations for removal or managing the asbestos and may include any proposed costs to

carry out the work. This plan will accompany completed survey documents. The engaging Service Area will need to ensure that copies of the survey documents produced are reviewed, actioned, and filed to the Keystone Database.

Duty Holders must also make themselves aware of any recommended asbestos works contained in the survey and management reports and to check with their council point of contact if they are unsure as to the level of works are required to remove asbestos from any contaminated areas.

Asbestos Surveys

An asbestos survey is required to be carried out on ALL Council owned properties that were built before the year 2000. This is to ascertain whether asbestos is present and if so, what course of action is required to manage the risk of exposure to asbestos fibres.

All asbestos surveys undertaken must be in accordance with HSE Guidance HSG 264 Asbestos: The Survey Guide.

There are two types of survey contained within HSG 264, a Management Survey and a Refurbishment and Demolition Survey:

Management Survey - are undertaken to help manage asbestos containing materials during the normal occupation and use of premises.

Refurbishment and Demolition Survey - are required where the premises, or part of them, need upgrading, refurbishing, or demolishing; or when any work is carried out that might disturb hidden asbestos that had not been previously identified.

Management Survey

A management survey is the standard survey; its purpose is to locate, as far as reasonably practicable, the presence and extent of any suspect ACMs in the building which could be damaged or disturbed during normal occupancy, including foreseeable maintenance and installation, and to assess their condition. Management surveys will often involve minor intrusive work and some disturbance. The extent of intrusion will vary between premises and depend on what is reasonably practicable for individual properties and will usually involve sampling and analysis to confirm the presence or absence of ACMs. However, a management survey can also involve presuming the presence or absence of asbestos. Management surveys are only likely to involve the use of simple tools such as screwdrivers and chisels.

This is the most common form of asbestos survey commissioned by Brentwood Council; however, it is **not suitable for significant refurbishment or demolition works**. Refurbishment and Demolition surveys will be commissioned as required to ensure compliance.

The areas inspected as part of the management survey should include underfloor coverings, above false ceilings (ceiling voids), lofts, inside risers, service ducts and lift shafts, basements, cellars, underground rooms, this list is not exhaustive).

Please Note: Any areas not accessed or inspected within an asbestos survey must be presumed to contain asbestos unless there is strong evidence that it does not. Areas not

accessed and presumed to contain asbestos must be clearly stated in the survey report and will have to be managed e.g. maintenance or other disturbance work should not be carried out in these areas until further investigations are carried out.

Refurbishment and Demolition Survey

To enable this level of identification the area must be fully accessible to the surveyor and appropriate investigation techniques and equipment be employed. Survey planning is essential, to allow the Surveyor to understand the scope of the intended works, for any exclusions to the survey to be agreed with the Council, and for arrangements to be made to clear, such as decontamination from hazardous substances if such contamination is likely, and isolation of services. HSG 264 emphasises the need for the survey area to be isolated from building occupants and that, ideally, reoccupation after survey is not planned. However, it recognises that this is not always achievable. Where the survey area is to be reoccupied assurance that it is acceptable for reuse must be obtained from the Surveyor.

Intrusive investigation works can be significant – making good after survey works is minimal unless requested otherwise. Suspect materials are sampled during the survey, and the extent of ACMs estimated. The condition of the ACM is generally not reported except where materials are damaged, if areas of asbestos debris may be expected, or if there will be a time delay between the survey and the intended refurbishment or demolition.

For a refurbishment or demolition survey to be successfully completed at least the following criteria must be met:

- area is unoccupied, with no intention to reoccupy after survey
- area is fully accessible – with fixings, furnishings, and heavy equipment removed, or at least easily movable
- area is fully accessible in terms of decontamination sign-offs and other relevant authorisations
- suitable survey techniques are employed – breaking through of partitions, opening up of floor voids, use of access platforms for high level areas etc.

If the conditions above are not met the survey will not be considered comprehensive. Limitations will be noted in the Survey Report and arrangements will need to be made to undertake further survey work when the site conditions area are appropriate.

The HSE recognise that unidentified ACMs may still remain in the survey area, thus appropriate controls need to be in place for the actual refurbishment period, and certainly for any demolition works.

Re-Inspection Surveys

Each Duty Holder that has control of a premise(s), must ensure that an management asbestos survey is carried out at each premise built before the year 2000 to ascertain whether or not asbestos is present. If the survey of a premise has revealed the presence of or the presumed

presence of asbestos, then a re-inspection of the premise must be carried out on an annual basis in accordance with the Approved Code of Practice L143 Managing and Working with Asbestos to ensure that any asbestos or presumed asbestos present is still undisturbed and undamaged and can be managed safely. A copy of the original survey report and any accompanying documentation must be available on site, in the Contractor Management 5C's Folder, as confirmation for any contractor that asbestos **is** present in the building and whether their designated area of work is affected or not. If no asbestos is found, a copy of the original survey report and any accompanying documentation must be available on site as confirmation for any contractor that asbestos is not present in the premise and is not present in their designated work area. However, no further asbestos surveys will be required unless refurbishment/ demolition works will be carried out on site, in this case a refurbishment and demolition survey is required to be carried out prior to any works commencing on site. Duty Holders must make themselves aware as to where to locate current up to date asbestos surveys, register and management plans for their premises and contact the Council's Housing Data Administrator in respect of queries on available asbestos documents specific to their areas of responsibility. The same applies when re-inspections are required for premises containing ACMs that need to be managed.

ACMs in Equipment

ACMs have frequently been used in technical equipment. Asbestos fibres have a range of properties - insulating, electrically conductive, resistance to acid – which made them suitable for many uses. Packing, panels to the sides and doors of flammable cabinets, and electrical equipment. Asbestos may also be present in certain washers and gaskets.

It is the responsibility of the Duty Holder to have asbestos containing equipment, materials and apparatus clearly identified, appropriately recorded and managed. Items known to contain asbestos should be disposed of where possible through a licenced contractor, or if they are to be retained, be recorded on the Asbestos Register and their condition monitored for deterioration.

Appendix 4 – Asbestos Register

The asbestos register is produced as part of the completed asbestos survey report detailing the location, type, condition, and status of any asbestos discovered or known to exist in a building or

area. This register is stored in an electronic format accessible to all employees which is managed by the Council's Housing Service Keystone Database.

The asbestos register exists to provide information to anyone working on Council housing buildings to make an assessment in order to minimise the potential risk of personal exposure to asbestos fibres if any exist in their designated work area, irrespective of whether they are engaged to carry out asbestos work or not.

Duty Holders must ensure that Housing employees or engaged third party contractors must be made aware as to the existence of any asbestos register appertaining to any residential property or properties that they are engaged to work in. Documentation must be held centrally by the Housing Service Repairs department to cover residential areas of properties to ensure information is cascaded down accordingly. Non-technical employees should not offer advice on whether to carry out asbestos work unless they have had the relevant training.

Although the control of asbestos regulations do not cover residential properties, the Council has a duty of care to ensure the health and safety of employees or authorised contractors working in residential properties where asbestos is found to be present and is taken into account.

The Register is updated by the Housing Data Administrator. Individuals, or organisations who affect data in the Register must supply relevant information to the Housing Data Administrator.

For example, where a Contractor is the Duty Holder (see "Duty Holders"), the Council Asbestos Register and its upkeep remains the responsibility of the Council. The Council will retain the Asbestos Register, which will be available for consultation on request. All asbestos related activities must be notified to the Council and undertaken only by Council-approved Licensed Asbestos Contractors, so that the Register can be updated.

Update may be required after:

- Identification of further ACMs
- Surveys
- Removal of ACMs
- Inspection/monitoring exercises
- Changes in building layout or area use.

At the "AMP Review" the Corporate Health & Safety, and Housing Compliance Manager will assess the range and quantity of amendments received.

Audit

Regular Register audits will be undertaken by the Corporate Health & Safety and the Housing Compliance Manager This will include comparison of representative Asbestos Register entries against site inspections and records of asbestos remedial works. The audit report will be made available to all relevant parties and will form part of the AMP Review.

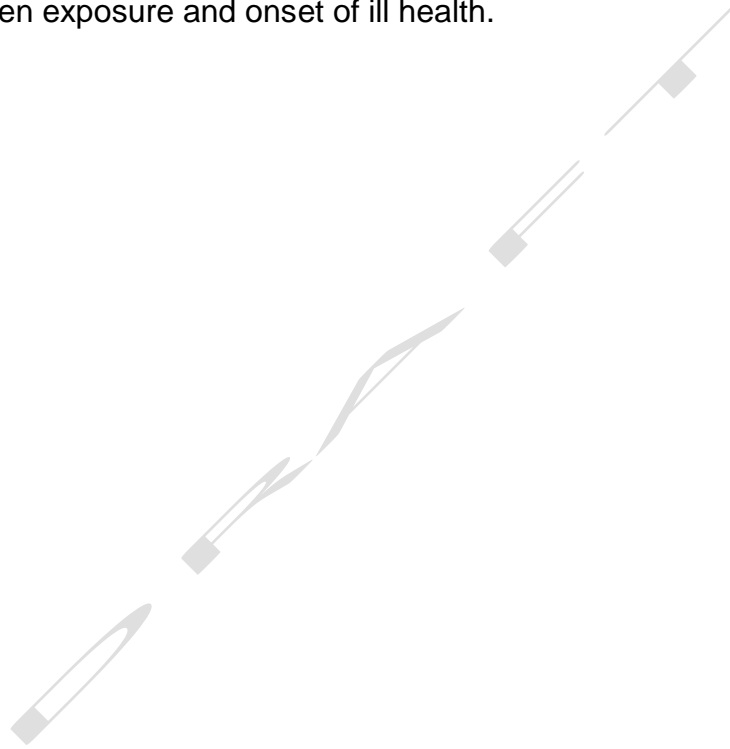
Appendix 5 – Exposure to Airborne Asbestos Fibres

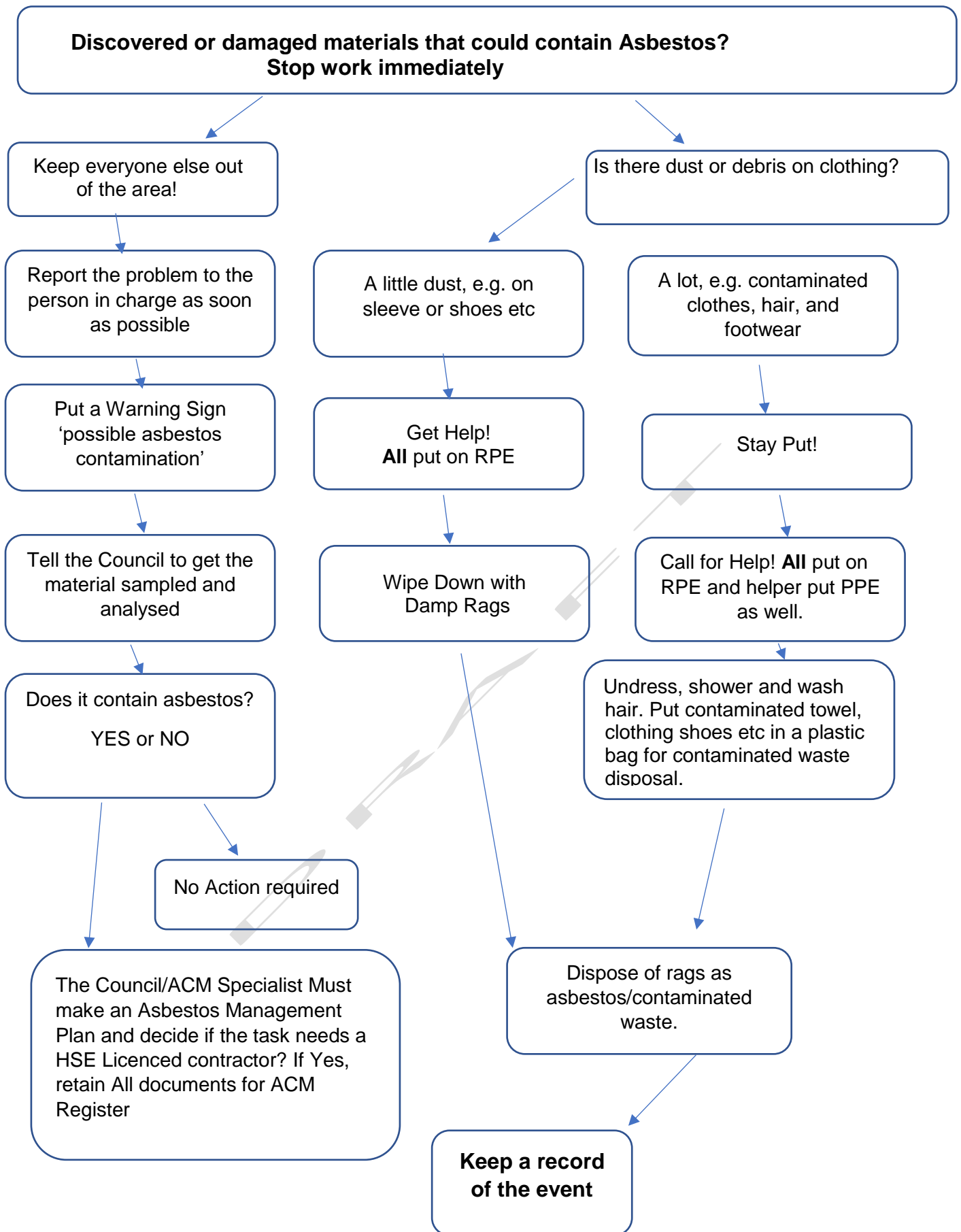
If employees/contractors have been exposed to asbestos or suspected exposure to asbestos, please refer to the Accidental Exposure to Airborne Fibres Procedure which must always be followed (Appendix 3).

Health surveillance allows for early identification of ill health and helps identify any corrective action needed. Where an employee(s) has been inadvertently exposed to asbestos fibres the employee must follow the Emergency Procedure in Appendix 5, notify their Line Manager or Team leader and following decontamination procedures subsequently consult with their GP and ask for a note to be made on their health record detailing the incident.

If employees/contractors have been exposed to asbestos or suspected exposure to asbestos, please refer to the Accidental Exposure to Airborne Fibres Procedure which must always be followed (Appendix 5).

A health record must be kept for all employees by HR under health surveillance. Health records, or a copy, should be kept for at least 40 years from the date of last entry because often there is a long period between exposure and onset of ill health.





Accidental Exposure to Airborne Asbestos Fibres Procedure

These procedures should be followed in the event of an unexpected exposure or suspected danger of exposure to asbestos containing materials (ACMs) and applies to all buildings, structures or assets owned, managed, or utilised by Brentwood Council.

Asbestos fibres may be released into the atmosphere when employees and/or contractors disturb such materials or asbestos containing materials have been damaged.

If employees or contractors discover damaged or suspect asbestos containing materials on site, the following steps should be taken:

1. Stop work immediately and evacuate persons from the area
2. Isolate the area i.e. closing the windows and doors and switching off any ventilation which could carry asbestos dust or fibres to other parts of the premises.
3. Secure the area to prevent any other persons accessing the area and put up warning notices. Ensure that persons who would normally access this area are instructed to keep away e.g. contractors, staff, cleaners, tenants, or visitors etc.
4. Contact person(s) with overall responsibility for the premises immediately.
5. Check the site asbestos survey/register for information concerning the affected area/material.
 - If the asbestos survey/register clearly identifies the area/material as asbestos containing materials, contact the appropriate Council asbestos points of contact (listed below) immediately and follow section 6(b)
 - If no survey/record exists, or is incomplete, or the area concerned is not specifically mentioned as being asbestos free, assume that asbestos is present and contact the appropriate Council asbestos points of contact (listed below) immediately to engage a licensed analyst to undertake a survey and risk assessment of the area, to include bulk samples and reassurance air testing.
 - If the area/material concerned is clearly identified as non-asbestos, notify the premises manager he/she may re-open the area. If there is any doubt, treat it as if asbestos is present.

Appropriate Council asbestos points of contact include:

Relevant contact details for BBC will be provided to all contractors undertaking work on site, so that any unexpected asbestos containing materials discovered during any works can be reported to the appropriate Responsible Persons or Duty holder.

The Asbestos Surveying Consultant and Asbestos Removals Contractor can be accessed via dedicated telephone numbers provided below:

- **Asbestos Surveying Contractor:** Thames Labs
- **Asbestos Removal Contractor:** Duct Clean & SAF
- **Brentwood Council Responsible Persons (RP):**

Housing: Housing Manager, Estates Management Team Leader, Compliance Manager and Technical Officer for Voids - Telephone 01277 312500
Out of Hours Emergencies: CCTV Department Telephone: 01277 312500

6. If the analysis proves:

a. the area/material has been confirmed by the licensed analyst to be non- asbestos then work can resume, and the area can be reopened.

b. the area/material has been confirmed by asbestos survey/licensed analyst to contain asbestos therefore appropriate action will be required to be taken i.e. encapsulate and manage asbestos or remove from the premise, by a licensed asbestos removal company. The licensed asbestos contractor and analyst should thoroughly clean and check the area respectively, in accordance with current legislation and the **Managing and working with asbestos: Control of Asbestos Regulations 2012: Approved Code of Practice and guidance**, before the area can be reopened. The following actions must be undertaken:

- The area should remain closed until the asbestos works are complete and the licensed analyst has issued the relevant clearance certificates.
- Any clothing or personal protective equipment being worn at the time of exposure should be put into disposal bags, which should then be double bagged and conspicuously marked asbestos and should be disposed of as asbestos waste.
- Contact your asbestos points of contact listed above who can arrange for a licensed asbestos removal company to remove contaminated clothing and PPE off site. The asbestos removal contractor will submit notification to the HSE where appropriate in discussion with the Council's Corporate Health and Safety Service.

7. If employee(s) have been exposed or suspect to have been exposed to asbestos containing materials then employees should follow the procedure in Appendix 5 and consult their GP follow this procedure.

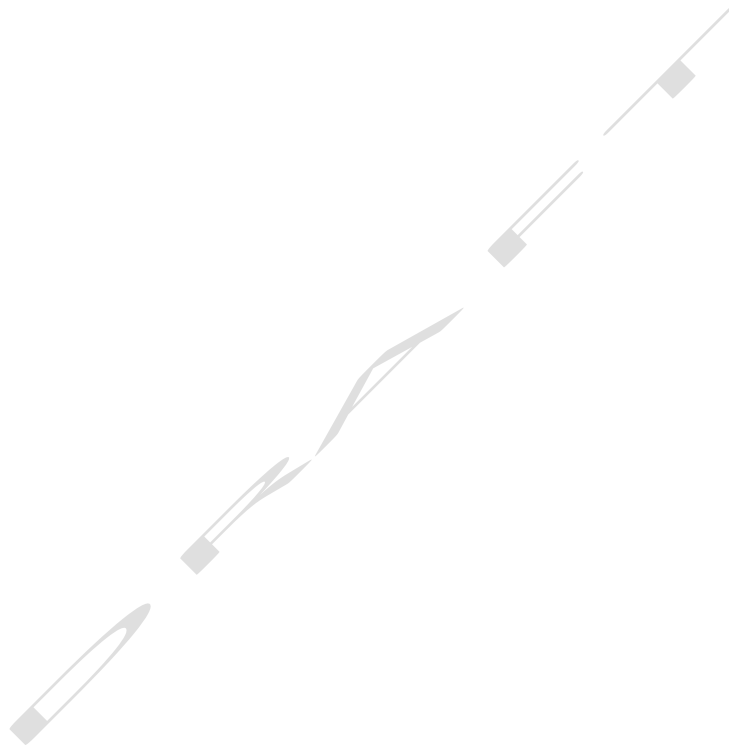
A note that the exposure has occurred must be made on the employee's health record or personal record. A copy of the note must also be given to the employee who should be told to keep the record indefinitely. This is because there is a significant delay between exposure and the development of asbestos related diseases, and the health effects may not occur until many years later.

8. Exposure to asbestos is reportable under the Reporting of Injuries, Diseases and Dangerous Occurrence Regulations (RIDDOR) as a Dangerous Occurrence therefore if an employee is found to have been exposed to asbestos at work it must be reported to the HSE and this would be classed as 'accidental release of any substance that may damage health'. All details of the incident must also be recorded on the Council's Online Health and Safety Incident Report Form and submitted. The Corporate Health and Safety Service must also be contacted immediately. (Please refer to the Councils H&S Incident Reporting Standard for further information).

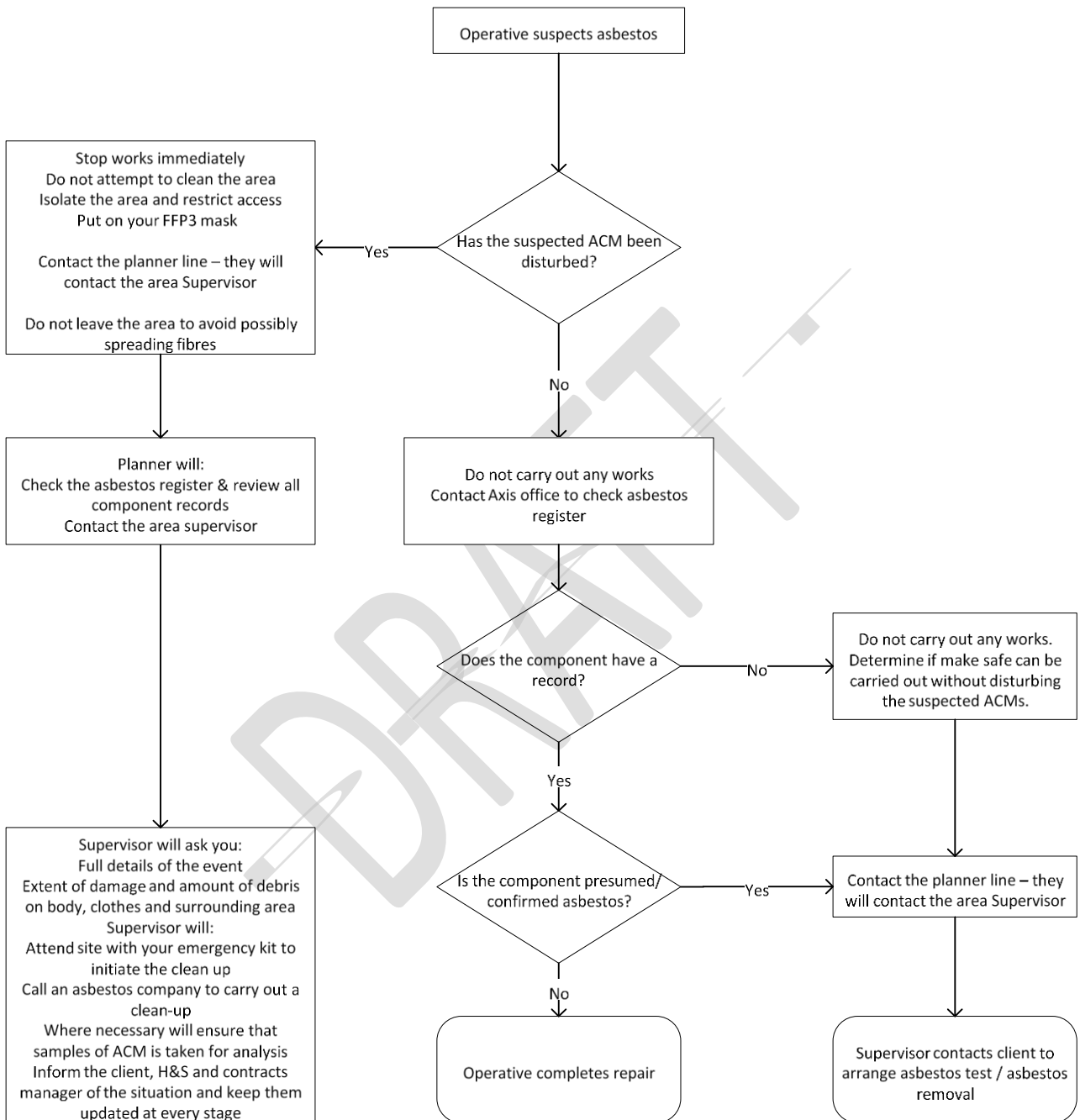
9. The Asbestos Steering Group and Corporate Health and Safety Advisor must be informed of any asbestos release. Once the emergency procedure has concluded, a full investigation is to be undertaken by the Duty Holder, to establish its cause, effect, and aid in preventing any further similar occurrences in the future. Any such occurrences and their outcomes shall be documented and reported to the Asbestos Steering Group for periodic review

10. Decontamination Procedure

The following has been replicated from the HSE Asbestos Essentials document 'em1' called 'What to do if you uncover or damage materials that may contain asbestos' and if followed should ensure compliance with the law.



Asbestos Procedure



Appendix 7 - Reporting of Asbestos Incidents

If an employee is found to have been exposed to asbestos at work i.e. if work activities are carried out without suitable controls, or the precautions fail to control exposure it must be reported under Reporting of Injuries, Diseases and Dangerous Occurrence Regulations (RIDDOR) as a Dangerous Occurrence and this should be classed as 'accidental release of any substance that may damage health'. This must also be reported to the Asbestos Steering Group.

Fly-Tipped Asbestos Waste

Where asbestos containing materials (ACMs) are discovered (or suspected) on Council land, the following should be carried out by the appropriate teams:

- Enforcement Team – report immediately to the Enforcement Officer who will investigate the area to locate any evidence identifying who it may have been dumped by.
- Housing Estate Officer/Caretaker – report immediately to the Housing Compliance Officer who will arrange for a licensed asbestos removal contractor to remove the asbestos off site and clear the area.

Once the licensed asbestos removal contractor has removed the asbestos off site, copies of the Waste Consignment Notes should be provided to the Housing Data Administrator and copies should be held on file.

The Enforcement Team may initiate an investigation to try and ascertain the identity of the originator of the fly tip, if this is carried out then mandatory disposable face masks FFP3 or half masks P3 must be worn including appropriate Personal Protective Equipment.

The following respiratory protective equipment and suitable personal protective equipment should be worn prior to investigating a fly tip that contains (or is suspected to contain) asbestos:

- Respiratory Protective Equipment (RPE) either disposable masks or half masks **must** always be worn which is **FFP3/P3 rated**. A face fit test should be carried out to make sure that the selected face piece is the right size and can correctly fit the wearer.
- Disposable overalls fitted with a hood - Type 5 (BS EN ISO 13982-1) should be supplied and worn as required
- Protective gloves - single-use disposable gloves should be supplied and worn as required.
- Boots without laces (laced boots are hard to decontaminate) should be supplied and worn as required

Please Note: Once RPE/PPE has been used, disposable RPE, filters and protective clothing should not be reused and be disposed of as asbestos waste after use if it (the offending material) was found to contain or suspected to contain asbestos.

Face Fit Testing

Fit testing will ensure that the respiratory protection equipment selected is suitable for the wearer. Respiratory protective equipment cannot protect the wearer if it leaks and therefore relies on a good seal to be effective. Facial hair (stubble and beards) can prevent a good seal of the mask to the face which will cause leakage of contaminated air around the edges of the mask and into the operative lungs.

Respiratory protective equipment fit testing should be conducted by a competent person who is appropriately trained, qualified and experienced, and is provided with appropriate information to undertake each task.

A copy of the manufacturer's user instructions should be made available to the wearer as this will give information on simple fit checks, such as those involving blocking filters and inhaling to create suction inside the mask so any leakage can be detected. A record of fit testing, inspection, examination, maintenance, and any defects that are repaired must be kept available on site for five years for inspection.

