

The Management of Asbestos at Work

Code of Practice

Ealing Council

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1. Introduction

- 1.1 This Code of Practice (CoP) provides additional advice and guidance to support that contained in the Ealing Council Asbestos Management Plan (AMP). This CoP provides a guide to the safety management system to control and reduce the risk of exposure to asbestos containing materials (ACM).
- 1.2 The CoP has been produced to enable Duty Holders, Responsible Persons, Line Managers, Partners and other key staff to undertake their duties to manage asbestos at their sites to reduce the risk of exposure to asbestos containing fibres.
- 1.3 Ealing Council seeks to comply with its duty to manage asbestos by surveying all of its sites. The council employs independent consultants to survey all of their sites. Type 2 surveys are completed to identify the presence and condition of any ACM on site. The Business Services Group (BSG) Property Services – Technical Services maintain an asbestos register containing the results of all the surveys together with other relevant information.
- 1.4 The surveys are available at the sites for the ACM to be managed safely.

2. Background

2.1 Asbestos containing materials (ACM) have been widely used in buildings as construction materials, fireproofing, thermal insulation, electrical insulation, sound insulation, decorative coatings, flooring and roofing products, heat-resistant materials, gaskets, and friction resistant products etc. If the asbestos is disturbed or damaged then it could potentially release harmful fibres, which if inhaled creates a serious health risk. Everyday maintenance of buildings (such as drilling holes to install cabling and cleaning), wear and tear and vandalism can result in release of harmful fibres. If the asbestos is in poor condition then this increases the risk of disturbing fibres.

2.2 Asbestos is a generic term to describe these naturally occurring mineral fibres contained in certain rocks amphibole and serpentine. Three different types of asbestos were used commercially in the UK:

Amphibole	1. Crocidolite (BLUE)
	2. Amosite (BROWN)
Serpentine	3. Chrysotile (WHITE)

2.3 Exposure to amphibole asbestos poses a greater health hazard than exposure to serpentine, but all types can cause asbestos related diseases. Exposure to asbestos fibres may cause asbestosis, lung cancer or mesothelioma. According to figures published by the Health and Safety Executive (HSE) mesothelioma kills 1900 people pa in the UK. The figures are set to increase because of the number of incidents involving construction and maintenance workers who come into contact with asbestos and/or disturb it during the course of their work. The consequences of exposure are not necessarily immediately apparent because asbestos related diseases that result in fatalities develop over a number of years. It kills in the proportion of:

1	Chrysotile (WHITE)
10	Amosite (BROWN)
100	Crocidolite (BLUE)

NB. HSE believes that asbestos killed 50,000 people in the 30 years up until 1998

2.4 The usage of ACM peaked in the period between 1960 - 70. Since 1985 because of the known health hazards associated with exposure to ACM the use of **BLUE** and **BROWN** has been banned in the UK. In 1999 the ban was extended to include the new use of any ACM building material and **WHITE** has been banned. Now the use of all ACM is banned in the UK. This has not removed the risk to the workers and others because of the massive quantities that were used and still exist in buildings. Therefore, it is necessary to identify where asbestos is present, assess its condition and manage the risk of potential exposure until it is safely controlled. The duty to manage is not necessarily the duty to remove asbestos because it is the potential exposure to the fibres that is dangerous.

2.5 There is no such thing as a safe exposure limit. The limits specified by Ealing Council are purely for the safe re-occupation of buildings.

2.6 The Control of Asbestos Regulations (CAR) 2006 require employers to prevent the exposure of their employees and others to asbestos, from work activities, or where this is not practicable, to reduce the exposure to the lowest possible level. The AMP sets out that each Director is the Duty Holder for the premises and personnel under their respective control. As well as imposing a duty to manage asbestos in premises this requires the employer to:

- undertake risk assessments before commencing work, which exposes, or is liable to expose employees to asbestos
- produce a plan of work detailing how the work is to be carried out and either prevent exposure to asbestos or reduce it to as low a level as is reasonably practicable.
- take reasonable steps to find out if there are materials containing asbestos in non-domestic premises, and if so, its amount, where it is and what condition it is in;
- make, 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 a plan that sets out in detail how the risks from these materials will be managed;
- take the necessary steps to put the plan into action;
- periodically review and monitor the plan and the arrangements to act on it so that the plan remains relevant and up-to-date; and
- provide information on the location and condition of the materials to anyone who is liable to work on or disturb them.

3. Aim

3.1 The aim of this CoP is to comply with the Corporate Health and Safety Policy to protect:

- Workers who may come across asbestos in the course of their day to day activities
- Others who may be at risk from the potential release of asbestos fibres into the air.

4. Objectives

4.1 The objectives are to provide and maintain safe working environments by:

- Keeping an up to date asbestos register
- Making surveys and other information available to the Responsible Persons
- Ensuring that risk assessments are completed by the Responsible Persons
- Training Responsible Persons, key staff and others
- Briefing contractors and others of the identified hazards and control measures

5. Scope

5.1 The Asbestos Management Plan (AMP) and Code of Practice (CoP) applies to all Ealing Council sites, employees and users of those sites.

6. Performance indicators

6.1 The achievement of the above will be measured by annually:

- Reviewing the asbestos register
- Ensuring that the surveys are available to the Responsible Persons
- Verifying that risk assessments are reviewed and revised annually
- Checking the training records of the Responsible Persons and key staff annually
- Confirming that briefing sessions have been completed

7. Duties and responsibilities

7.1 Duty Holder: The Duty Holder must identify and appoint a Responsible Person for all sites in their department and ensure that these persons attend relevant training to manage the identified risk once the risk assessment has been completed. They must supply the name and contact details of the Responsible Person at each site under their control to the Business Services Group Property Services – Technical Services. It is the Duty Holder's responsibility to ensure that this information is reviewed and revised quarterly and the results of the review reported to the Departmental Health and Safety Committee and the BSG Property Services – Technical Services

7.2 Responsible Person: The Responsible Person is the person in control of maintenance activities at the site and must:

- Assess the risk of the asbestos present at the site and determine its condition
- Record the results of the risk assessment and pass them onto the other occupiers/ users of the premises
- Collaborate with the occupiers and others in the preparation and implementation of the management plan to control the risk from asbestos containing materials (ACM)
- Ensure anyone potentially at risk receives information on the location and condition of the ACM

7.3 Key staff: Other key staff, such as BSG Property Services – Technical Services who are not Duty Holders but have information on or control of premises are required to assist the Responsible Persons to comply with their legal responsibilities. This level of co-operation does not extend to paying or sharing the costs of any actions to manage the risks but is to enable the Duty Holder and Responsible Person access to the site or stored records.

7.4 Line Managers: The Line Manager of the Responsible Person (if not the Duty Holder) must ensure that the Duty Holder documents and priorities the identified health and safety action needed by the Responsible Person.

7.5 Corporate Health and Safety (CHS): provide further advice, information and training. The identified training needs are as follows:

Asbestos Training Needs	
Asbestos Awareness	The Duty Holders and other key staff must attend a half-day asbestos training course
Risk Assessment	The Responsible Persons and other key staff must attend a one-day asbestos training course
Site Induction	The Responsible Person will provide site specific induction training to all users (particularly contractors)

8. Work to be done

There are five stages to be completed:

Stage 1 Delegating the task

Stage 2 Finding ACM and assessing their condition

Stage 3 Assessing the risk

Stage 4 Managing the risk and preparing a plan

Stage 5 Monitoring arrangements

Stage 1 Delegating the task

8.1 The Duty Holder in Ealing Council is the Departmental Director. The Duty Holder can delegate work in total or in part to a competent person or another organisation, but the legal responsibility remains with the Duty Holder and this cannot be delegated. For example Ealing Council employ independent consultants to complete asbestos surveys and to provide expert advice and guidance to assist the Duty Holder in complying with their responsibility.

8.2 Where the Duty Holder appoints another person to do some or all of the work the Duty Holder must assess whether they are competent in the following four areas. They must be:

- Adequately trained, and have knowledge and experience in such work
- Able to demonstrate independence, impartiality and integrity
- Able to demonstrate that they have a quality management system in place
- Able to carryout any such work in accordance with MDHS100 (2001)

8.3 Where the Duty Holder appoints another to carry out a survey they must be UKAS accredited and from the e-approved list. The appointed surveyor must be competent and has the required accreditation to undertake a Type 2 survey and practical experience of the type of building.

NB. The BSG Property Services – Technical Services on behalf of the Duty Holders, appoints the asbestos consultants.

Stage 2 Finding ACM and assessing their condition

8.4 The Duty Holder must ensure that the asbestos survey (Type 2) is completed in accordance with the detailed guidance in MDHS 100 as to whether or not there is any asbestos anywhere in the premises or on the site. The surveyor should assess the risk identified in doing the survey before commencing the work. Only Type 2 surveys are considered to be suitable and sufficient for Ealing Council property. The surveyor should check that any other documentary evidence available is correct.

8.5 The Responsible Person should accompany the surveyor when the Type 2 survey is undertaken as part of their basic awareness training to manage asbestos at the site. The condition of any ACM found must be checked and recorded as part of the site survey.

8.6 The TU safety representatives and employees should be consulted about the findings and if required see the records of the survey. Any part of the premises not

surveyed must be identified on the drawing and it must be assumed that it contains asbestos unless there is strong evidence that it does not. If the survey does not identify any ACM then nothing more needs to be done but the survey must be reviewed and revised if any new information is received about the potential presence of ACM.

8.7 The records must be reviewed and brought up to date whenever any changes happen at the site that affects the potential risk of exposure. Records of the completed surveys are filed in BSG Property Services –Technical Services and a copy must be accessible on the premises for the entire life of the premises.

Stage 3 Assessing the risk

8.8 The information on the drawing or record of the location of the ACM must be used in completing the risk assessment of anyone being exposed to asbestos. The Responsible Person must decide what action is going to be taken to ensure that the identified risks are managed to prevent people from being exposed.

8.9 The risk assessment must consider each area containing ACM, where it may be disturbed or damaged by maintenance and by any other activities on the premises.

8.10 The ACM must be managed and maintained safely. The risk assessment must identify control measures to reduce the likelihood of exposure from any airborne fibres being released from the ACM.

8.11 The Responsible Person must consider materials that:

- have deteriorated or been damaged
- are likely to be disturbed in the course of regular or planned maintenance work
- are very accessible and likely to be disturbed or damaged in normal use
- may be damaged by vandalism

8.12 The decision must be recorded and kept with the drawing or record of the location.

Stage 4 Managing the risk and preparing a plan

8.13 A written plan needs to be prepared. The risk assessment information needs to formulate an Action Plan as to how the ACM are to be managed under normal conditions without damage or risks and also for emergency situations when the ACM has been damaged/deteriorated or otherwise where fibres have been released and become airborne.

8.14 Ealing Council where necessary will appoint a specialist consultant to carry out risk assessments (in conjunction with the Responsible Person) for those locations with asbestos surveys in place. The Responsible Person utilising the information identified in the Type 2 survey must complete the risk assessment in Appendix I.

Stage 5 Monitoring arrangements

8.15 Asbestos surveys must be completed at all Ealing Council sites. The survey results are stored electronically on the BSG Property Services – Technical Services Asbestos Register. Hard copies of the asbestos site surveys can be obtained from BSG Property Services – Technical Services

8.16 The surveyor has copies of the asbestos surveys pending further software development to enable them to be loaded on the Council's database. The Responsible Person can request asbestos data from BSG Property Services – Technical Services as part of their ongoing duty to inform contractors that they commission to work on their site.

8.17 Ealing Council has decided not to identify ACM by labelling or colour coding its presence at any of its sites. The location of the ACM is shown in the survey and on the drawing. The location must be identified on the asbestos risk assessment.

8.18 The asbestos risk assessment must be kept and maintained on site to comply with the AMP. Individual Departments are responsible for their own site management arrangements.

8.19 The Responsible person must review the condition of the ACM on a regular basis as identified in the AMP and site risk assessment. This is of particular importance whenever contractors are working on site.

8.20 The Duty Holder must report on the condition of the ACM to the DHSC and BSG Property Services Technical Services on a quarterly basis.

8.21 The Responsible Person must follow the emergency procedures for the site for all incidents involving asbestos. A copy of the asbestos risk assessment must be filed with the Fire Risk Assessment on the site.

8.22 The Responsible Person must report all asbestos incidents immediately to: Corporate Health and Safety on tel 020 8825 9000. The Duty Holder and BSG Property Services – Technical Services must then be informed.

9. References

[Control of Asbestos Regulations 2006](#)

[Approved Code of Practice The Management of Asbestos in Non-Domestic Premises, L127, ISBN 9780 7176 6209 8](#)

Asbestos Essentials

<http://www.hse.gov.uk/asbestos/essentials/index.htm>

MDHS100 – surveying, sampling and assessment of asbestos*

[**MDHS100** - Surveying, sampling and assessment of asbestos ...](#)

Manage buildings? You must manage asbestos

<http://www.hse.gov.uk/pubns/manageasbestos.pdf>

Guidance for safety representatives

<http://www.hse.gov.uk/asbestos/repsguide.pdf>

Asbestos kills: A quick guide

<http://www.hse.gov.uk/pubns/indg418.pdf>

Asbestos kills: Protect yourself

<http://www.hse.gov.uk/pubns/indg419.pdf>

Asbestos a guide for schools

<http://www.hse.gov.uk/asbestos/schools.pdf>

Corporate health and safety policy

http://inside-ealing.lbe.gov.uk/ealing2/export/sites/ealingintra/services/working_in_ealing/policies_and_rights_at_work/health_and_safety_handbook/health_handbook/CorporateHealthSafetyPolicy_Nov06.pdf

Note

* Asbestos Management Risk Assessment (overleaf)

The template produced is based on the advice and guidance contained in MDHS100

10. Asbestos Management Risk Assessment

Appendix I

Sample No	Product Type	Score	Extent of damage and/or deterioration	Score	Surface Treatment	Score	Asbestos Type	Score	Total Score	Management Action Needed
Sample Variable	Score	Reference information to be used to identify scores								
Product type (or debris from product)	1	Asbestos reinforced composites (plastics, resins, mastics, roofing felts, vinyl floor tiles, semi rigid paints or decorative finishes, asbestos cement, etc								
	2	Asbestos insulating board (AIB) mill boards, other low density insulation boards, asbestos textiles, gaskets, ropes and woven textiles, asbestos mattresses and packing								
	3	Thermal insulation (e.g. pipe and boiler lagging), sprayed asbestos, loose asbestos, asbestos mattresses and packing								
Extent of damage / deterioration	0	Good condition								
	1	Low damage								
	2	Medium damage								
	3	High damage /DEBRIS								
Surface Treatment	0	Composite								
	1	Encapsulated Asbestos insulating board (AIB)								
	2	Unsealed Asbestos insulating board (AIB)								
	3	Unsealed lagging								
Asbestos Type	1	Chrysotile								
	2	Amosite								
	3	Crocidolite								
Score the risk using the above information for the sample variables. Add the total score across the page. The total is a means of guidance for control purposes, i.e. 3 or less very low risk; 4-7 low; 7-10 medium; 10 or more High risk						Management Action Needed The options are: (a) protect (b) seal (c) repair (d) remove				

For further advice and guidance please contact Corporate Health and Safety at Ealing Council Perceval House 14/16 Uxbridge Road London W5 2HL Tel 020 8825 9000