

Asbestos Management Plan

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1. INTRODUCTION

This Asbestos Management Plan (AMP) describes how Summerhill Services Ltd manages the risks from asbestos containing materials (ACMs). It sets out company policy and procedures and is designed to effectively manage and minimise asbestos-related health risks to personnel working at or visiting SSL managed sites.

1.1 Presence of Asbestos

Asbestos was used in the UK up to 2000 in the construction and manufacturing industries. Any building along with its associated plant, constructed or refurbished prior to this year, may contain asbestos in one or other of its many different forms.

The presence of an ACM does not in itself constitute a danger. However, the ACM may become hazardous when disturbed or damaged and must be treated accordingly. Activities which give rise to airborne dust, e.g. breaking, sawing, cutting, drilling etc. are most likely to present risks.

It is important to note that Summerhill Services Ltd manages most but not all of the buildings used by its staff and by the staff of Birmingham & Solihull Mental Health Foundation Trust (BSMHFT). Those buildings managed by other parties will have their own asbestos management arrangements.

2. POLICY

2.1 SSL Policy

It is SSL policy to:

- prevent exposure to the hazards associated with asbestos
- promote awareness of the Asbestos Management Plan (AMP) and the hazards of asbestos, through training and induction of staff and those working on behalf of SSL
- provide and maintain an Asbestos Register
- provide information and advice on asbestos issues
- develop, implement and review an effective management strategy so that appropriate measures, such as sealing, labelling, inspection or removal of ACMs are undertaken regularly review the AMP

2.2 Asbestos Management Plan

The Asbestos Management Plan sets out the mechanism by which ACMs are managed. It includes details on how the SSL intends to:

- Protect those working on the fabric of SSL managed buildings
- Protect those working within or occupying SSL managed buildings
- Effectively control any works likely to affect ACMs
- Identify and categorise ACMs and manage those hazards based on prioritisation and assessment of the risk that they present
- Produce a prioritised programme for the remediation of ACMs that, because of their location and/or condition, present a potential risk to health
- Monitor and maintain the condition of identified ACMs that are assessed as being able to be left insitu

3. ORGANISATION AND RESPONSIBILITIES

3.1 Definition and Responsibilities of the Duty Holder

The duty to manage asbestos is contained in regulation 4 of the Control of Asbestos Regulations 2012. The Duty Holder is the person or organisation that has clear responsibility for the maintenance or repair of the premises including through an explicit agreement such as a tenancy agreement or contract. **At Summerhill Services Ltd, the Duty Holder is the Managing Director, Shane Bray.**

The Duty Holder will ensure that:

- A competent person(s) or organisation is appointed to provide technical and professional support and advice
- A Plan, the Asbestos Management Plan (AMP) is produced setting out the measures and arrangements that Summerhill Services Ltd has in place to discharge its duties under the Control of Asbestos Regulations 2012.
- All buildings, managed by Summerhill Services Ltd 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.
- Roles and Responsibilities for Key Officers and Managers are set out in the AMP
- That breaches of duties or procedures as set out in the AMP are fully investigated and action taken to review procedures to prevent a recurrence
- The AMP will be reviewed annually to ensure it tracks any legislative or organisational changes and remains fit-for-purpose

3.2 Responsibilities of Authorised Persons (Asbestos)

The Authorised Persons (Asbestos) are responsible for ensuring:

- Information on ACMs being appropriately stored and made available to all interested parties
- Appropriate records of asbestos works are generated and retained
- The Asbestos Register is maintained and regular audits of the Asbestos Register are undertaken
- Following risk assessment, ACMs are assigned appropriate management options and priority actions are timetabled
- Arrangements are made so that all relevant personnel and organisations receive appropriate information, instruction and training related to ACMs and the existence and use of the Asbestos Register
- Emergency procedures are established and reviewed regularly

3.3 Responsibilities of SSL Staff

SSL Staff are responsible for:

- Immediately reporting to the Building Manager and Authorised Person (Asbestos), any known ACMs which are damaged or disturbed or any suspect ACMs of any condition and any defects or concerns they may have related to asbestos issues or remedial works
- Contacting their Line Manager, or Authorised Person (Asbestos), regarding any work to be undertaken which may involve ACMs
- Attending an Asbestos Awareness training course when so requested

4. IDENTIFICATION OF ACM'S

4.1 Management Surveys

Management (formally Type 2) surveys are intended to identify ACMs that could affect the normal occupation of a building.

Management surveys have been undertaken for all SSL managed properties other than in those properties constructed after year 2000.

4.2 Refurbishment Surveys and Demolition Surveys

These surveys are intended to locate and describe all ACMs in a project area and must be undertaken before any refurbishment or demolition is due.

5. ASBESTOS REGISTER

5.1 Contents of the Register

The Register records known and suspected ACMs in SSL managed locations. It contains information on their:

- location, extent, condition and labelling status

The Register also provides detail on:

- non ACMs where, in the normal course of the building operation, they may be confused with ACMs
 - areas, where known, which have not been surveyed.

The presumption is made that ACMs may be present in all un-surveyed areas.

5.2 Availability

The Asbestos Register is available to all who may reasonably require such information.

The Asbestos Register is distributed to the Estates Managers covering the South and Solihull Community sites and the two Forensic sites where asbestos is known or presumed to be present. The Estates Managers distribute the Asbestos Register to their respective teams.

The Asbestos Register is also distributed to the IT Department of Birmingham & Solihull Mental Health Foundation Trust.

The Asbestos Register for each individual site is available at the reception of that site. Contractors undertaking works within that premises are required to refer to the Asbestos Register before commencing works.

5.3 Updates

The Asbestos Register is updated by the Authorised Person (Asbestos). An update may be required after:

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

6. RISK ASSESSMENT OF ASBESTOS CONTAINING MATERIALS (ACM'S)

All ACMs in the Asbestos Register are objectively assessed by the Authorised Person (Asbestos) using a formal numerical scoring scheme. This considers aspects of materials assessment and priority assessment as described in the HSE document HSG 227 'A comprehensive guide to managing asbestos in premises'.

The materials assessment considers features of the material, the priority assessment takes into account the environment in which the ACM is found and the likelihood that persons may be exposed to asbestos fibres.

The materials assessment is undertaken as part of the Management Survey and a materials assessment score is provided in the survey report.

The priority assessment is undertaken by the Authorised Person (Asbestos) and Priority Score and Total Risk Score is provided in the Asbestos Register.

7. MANAGEMENT OF ASBESTOS CONTAINING MATERIALS (ACM'S)

7.1 Management of ACM's

Management options stated within the Asbestos Register are assigned by the Authorised Person (Asbestos) and are considered the appropriate choice at the time of Register review.

Long term ACM maintenance considerations, including cost, resources, potential for exposure etc, will be taken into account and opportunities taken for removing materials, particularly during periods of building closure or refurbishment.

In general ACMs with higher risk scores will be identified for remedial works, whilst those with lower scores will be retained within the management scheme for in-situ materials.

7.2 Inspection of ACM's

Formal re-inspections of known or suspected ACMs, will be undertaken annually and will be co-ordinated by the Authorised Person (Asbestos). Re-inspection will require checking of known ACMs against Register information.

The re-inspection findings will be used to update the Asbestos Register.

7.3 Leaving ACM's in Place

Where ACMs are in good condition, with minimal potential for fibre release, they may be left in-situ. The Head of Maintenance is responsible for ensuring these materials are kept in a sound condition.

7.4 Labelling of Asbestos Containing Materials

Labelling with standard 'asbestos warning labels' or fixing of appropriate warning signage will be carried out to all known accessible ACMs considered to be of significant risk where this is deemed to:

- help prevent accidental damage, and
- not cause undue concern

7.5 Improvement Works

Where an ACM has minor damage, a simple repair and/or sealing (encapsulation), may be appropriate. The technique and materials used will be dependent on the ACM and may include over-cladding or use of liquid applied encapsulants.

Repairs and any encapsulation measures will be undertaken by a Licensed Asbestos Contractor, with the local area being isolated, either by constructing an enclosure or using local exclusion techniques.

7.6 Removal of Asbestos Materials

The term 'removal' is used to describe both the removal of bulk materials and the decontamination of areas where debris or trace asbestos contamination has been identified.

Removal of ACMs is carried out as a result of:

- Such work being stated within the Action Plan
- Recommended works related to planned projects, or
- Unplanned circumstances, such as damage to ACM's or identification of high risk ACM's

7.7 Remedial Works Records

Remedial works records will be held by the Authorised Person (Asbestos).

Records will include:

- Works specification
- Removal method statement
- Air monitoring report
- Certificate of Re-Occupation with 4 Stage Clearance documentation (where relevant) Waste consignment notes

Records will be held for an appropriate period.

8. PROJECT MANAGEMENT PROCEDURES FOR BUILDING WORKS

8.1 Work

For the purpose of the Asbestos Management Plan, the term 'work' is used for any activity that has the potential to affect the fabric, finishes or services of a building, or which requires entry to services areas or voids.

8.2 Review of Work Area

All works within SSL managed estate with the potential to alter or damage the fabric of the building, service voids, building services etc., must be reviewed by the Project Manager with regard to:

- Possible presence of ACMs (including the undertaking of a refurbishment or demolition survey)
- Control measures to be taken to avoid damage or exposure
- Any necessary remedial/removal works
- Potential impact on project programme

The review must be carried out by the Project Manager at an early stage of the project to allow sufficient time for project implications of ACMs to be assessed.

8.3 Additional or Suspect ACM's

The Project Manager is responsible for making sure works are halted if suspect ACMs are discovered and that further advice is sought.

9. SPECIALIST CONTRACTORS

9.1 Licensed Asbestos Removal Contractors

Remedial works to ACMs, including encapsulation, will generally be carried out by a Contractor holding a License under the Asbestos Licensing Regulations.

In specific circumstances non Licensed Contractors may undertake work where this falls outside the asbestos licensing requirements and is of acceptably low risk. In these circumstances all relevant health and safety regulations, including provisions of the Control of Asbestos Regulations must be complied with.

9.2 Use of Advisory Services

Advice and services may be sought from external specialist organisations. Only organisations holding the appropriate qualification and UKAS accreditation, for example to ISO 17020 for building surveys for ACMs or to ISO 17025 for analytical services will be used.

10. EMERGENCY PROCEDURES

10.1 Definition of an Emergency

Emergencies are unexpected situations requiring sudden and urgent action. In the context of asbestos the immediate measures taken should prevent or minimise exposure to airborne asbestos fibre.

Following this action there may be a subsequent requirement to bring in specialist contractors such as an UKAS accredited Analytical Consultancy or Licensed Contractor.

The Authorised Person (Asbestos) will assess and organise suitable arrangements.

10.2 Emergency Procedure – Damaged ACM

If an incident occurs where known or suspected ACM's are damaged or if asbestos remedial works cause an uncontrolled release of asbestos fibres (e.g. if an asbestos removal enclosure is damaged), the following actions must be undertaken:

- Do not disturb the material or stay longer in the affected area than is essential
- Seal off the area – close windows, doors etc. so long as this is possible without causing further disturbance to the material/staying longer in the area
- Evacuate the local area and prevent others from entering the area by using signage, sealing up doorways or posting guards at an appropriate distance
- Report the incident to the local Site Manager and to the Estates and Facilities Department
- If the incident occurs within, or is associated with, a Project area, contact the Site or Project Manager
- The Site Manager/Project will then contact the Authorised Person (Asbestos) who will provide site specific advice
- Shut down air handling units and local ventilation if relevant and possible
- Where an individual's clothing may have been contaminated by asbestos, the Authorised Person (Asbestos) should be immediately contacted. The individual should wait, ideally in a location away from others, for a change of clothing to arrive

10.3 Emergency Procedure – Discovery of Undamaged Suspected ACM

If an incident occurs where suspected ACM's are discovered once works have commenced and the material is undamaged, the following actions must be undertaken:

- Do not disturb the material
- Secure the local area and prevent others from entering the area by using signage
- Report the incident to the local Site Manager and to the Estates and Facilities Department
- The Estates Manager must report the incident to the Authorised Person (Asbestos)
- The Authorised Person (Asbestos) will contact an independent asbestos consultant to analyse, risk assess and if necessary sample the material
- The independent asbestos consultant will make recommendations as to the appropriate actions required
- Works may continue only once the appropriate actions recommended by the independent asbestos consultant have been undertaken

10.4 Reports and Records

Record of Suspected Exposure to Airborne Asbestos Form

If an employee of Summerhill Services Ltd considers they may have been exposed to airborne asbestos fibre, they must contact the Authorised Person (Asbestos), so that a Record of Suspected Exposure to Airborne Asbestos form can be completed (see Appendix 1).

A record should be made with Occupational Health on the employee's personnel record. The original form should be maintained by the Authorised Person (Asbestos) in the incidents file for **40 years**.

A copy of the form will be given to the employee and should be retained indefinitely.

Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)

Where exposure occurs above the control limits set in the Control of Asbestos Regulations the requirement to report the incident under RIDDOR will generally be assessed and carried out by the Authorised Person (Asbestos).

11. INFORMATION AND TRAINING

11.1 Information

Information on the AMP and the management of ACMs will be available to all relevant personnel and organisations.

11.2 Training

The Head of Facilities Management will ensure that a suitable level of expertise is available at Summerhill Services Ltd, either by in-house training of employees, by using external training courses or resources, or by establishing a relationship with a specialist external organisation such as a UKAS accredited Consultancy.

Risk groups, such as new employees, newly appointed contractors etc. may require asbestos awareness training or similar as part of their initial induction process.

Asbestos tool box talks are also given to SSL tradesmen. The tool box talks cover the following:

- Types of asbestos
- Health effects
- The Asbestos Register
- Emergency procedures

The asbestos training records will be held by the Compliance Officer.

12. ACTION PLAN

The Asbestos Action Plan contains priorities and timetables or targets for both remedial works e.g. removal works, encapsulation and non-remedial works e.g. training issues, survey requirements.

Consideration of a timetable for any remedial works will take account of several factors including:

- ACM risk assessment score
- Building occupation constraints
- Financial resources
- Other planned building works

Action Plan documentation is retained by the Authorised Person (Asbestos).

Appendix 1

Record of Suspected Exposure to Asbestos Form

Personal Details:

Name: _____ Date of Birth: _____

Address: _____

Job Title: _____

During the course of my work on _____ (date) I discovered what I believe to be asbestos, the details of this being as follows:

Name of Premises / Address Where Exposure Suspected to have occurred:

Room Number & Block: _____

Name: _____

Address: _____

Post code: _____

Date of Suspected Exposure: _____

Location of Suspected Asbestos:

Please detail the exact location of the suspected asbestos below: _____

Specify use if known: _____

Asbestos accidentally damaged / disturbed by you? Yes / No [circle appropriate]. Asbestos damaged / disturbed before work? Yes / No [circle appropriate].

Type of work being done and equipment used: _____

Signature of employee: _____