

Report to Cabinet
25 June 2014

Item

Report of Deputy Chief executive (operations)

12

Subject Asbestos Management Policy

Purpose

To consider the council's Asbestos Management Policy.

Recommendation

To approve the Asbestos Management Policy for the Council's property portfolio.

Corporate and service priorities

The report helps to meet the corporate priority "Decent housing for all".

Financial implications

The Asbestos Management Policy will, to a large extent, determine expenditure for asbestos management for this financial year and future years within the current investment plans.

Ward/s: All wards

Cabinet member: Councillor Bremner - Housing

Contact officers

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Background documents

None

Report

Background

1. The Council has legal obligations under a number of statutes and regulations including:
 - The Control of Asbestos Regulations 2012 (CAR) Health and Safety at Work Act 1974
 - The Management of Health and Safety at Work Regulations 1999
 - The Workplace (Health Safety & Welfare) Regulations 1992
 - The Housing Health and Safety Rating System (2006)
 - The Landlord and Tenant Act 1985.
2. It is a legislative requirement that the Council has a working asbestos management plan that includes all housing stock, communal areas and non-housing stock that are controlled by the Council.
3. The asbestos management policy specifically relates to the management of the risks associated with asbestos containing materials that may be found within the Council's property portfolio. All references within the policy document referring to tenants or customers are council housing tenants, and all references to council are referring to the council in its landlord capacity.

Funding

4. The Council is committed to its duty to managing asbestos and its duty to prevent or release the spread of asbestos and as such will ensure that it highlights the responsibilities for the safe management of asbestos containing materials to its employees, leaseholders and tenants.
5. Any works will be funded for the financial year 2014-15 from existing revenue or capital budgets.

Policy

6. The policy aims to:
 - a) Set out how the Council manages the risks from asbestos containing materials (ACMs) within the council's property portfolio.
 - b) Ensure that the Council meets all its statutory and regulatory obligations in respect of asbestos management.
 - c) Highlight the responsibilities of employees, leaseholders and tenants in managing asbestos.
 - d) Provide a methodology for the implementation of the asbestos management plan.

- e) Set out procedures for planned major refurbishment or demolition.
- f) Provide emergency procedures for the uncontrolled release of asbestos.
- g) Name overseers/controllers of the asbestos management plan.
- h) Provide a review procedure and timetable for the asbestos management plan.

Consultation

- 7. The policy has been developed in conjunction with the following stakeholders:
 - a) NPS Norwich (formerly Property Services).
 - b) Tenant representatives.
 - c) Other relevant Council officers.

Equality

- 8. The impact assessment did not highlight any equality implications.

POLICY		Asbestos Management Plan	
DATE ISSUED: June 2014		REVIEW DATE: June 2015	
ISSUED BY: NPS Norwich (property services)			
PURPOSE OF POLICY The purpose of the policy and associated appendices is to set out how Norwich City Council (NCC) manages the risks from asbestos containing materials (ACMs) within the council's property portfolio. It is designed to effectively manage and minimise asbestos related health risks to personnel working in or occupying its housing stock. The policy should be read in conjunction with the overarching Asset Management Strategy.			
AUTHORISATION It is anticipated that this policy will be approved by Cabinet in June 2014. It delegates the authority to assess individual cases to the operations director (NPS Norwich), and where appropriate, and reasonable to do so, agree exceptions to the policy. The policy will be reviewed on an annual basis and the authority to agree revisions will be delegated to the deputy chief executive (operations).			
RELEVANT LEGISLATION INFORMING THIS POLICY 1. The Control of Asbestos Regulations 2012 (CAR) 2. Health and Safety at Work Act 1974 3. Management of Health and Safety at Work Regulations 1999 4. Workplace (Health, Safety and Welfare) Regulations 1992 5. Housing Health and Safety Rating System 2006			
CONTRIBUTES TO CORPRATE PRIORITIES The policy helps to meet the corporate priorities ‘to make Norwich a city with decent housing for all’ and ‘to provide value for money services’.			

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1. INTRODUCTION

1.0 Introduction

The plan will set out how Norwich City Council manages the risk from asbestos containing materials, and shall also include the following:

- Highlight responsibilities of employees, leaseholders and tenants in managing asbestos in a good condition and the duty to prevent or release the spread of asbestos
- Training/awareness arrangements and programme
- Methodology for the implementation of the management plan
- Mechanism for passing on information to interested parties
- Procedures for planned major refurbishment or demolition
- Emergency procedures for uncontrolled release of asbestos
- Liaison mechanism with emergency services
- Named overseers/controllers of management plan
- Review procedure and time table for the management plan

1.1 Policy summary

- It is a legislative requirement that Norwich City Council has a working asbestos management plan.
- The management plan shall include all housing stock, not just 'communal areas', and non-housing properties controlled by NCC.
- A management plan is dependant on an active up-to-date asbestos register.
- On-going surveys and inspections will add to the asbestos register.
- The people involved in surveying and inspecting shall be suitably qualified and

competent.

- The Control of Asbestos Regulations 2006 allowed for work on asbestos contained within a firmly linked matrix without notification or licensing. Such work is still subject to the Control of Asbestos Regulations.
- The Control of Asbestos Regulations 2012 created a third category of work with asbestos containing material, Notifiable non-licensed work, see Appendix A
- Most asbestos containing materials can be managed in place, subject to the management plan.
- Random air monitoring will take place to build a body of evidence to complement the management plan.
- Staff and contractors will have the necessary training suitable and sufficient to conduct their work safely.

1.2 Regulatory requirements

The Control of Asbestos Regulations 2012 (CAR) highlights a duty to manage asbestos in non-domestic premises.

From the perspective of NCC the interpretation of non-domestic premises are the commercial, operational and heritage buildings, and communal areas and stairwells to flats, foyers and vestibules of the domestic housing stock.

However, when responsive or planned repairs are carried out within a house/flat then that area becomes a place of work and is also covered by CAR, and general Health and Safety at Work Act requirements, including Management of Health and Safety at Work Regulations (1999), Workplace (Health, Safety and Welfare) Regulations (1992) which impose a duty upon the employer to protect workers and occupants from uncontrolled risks and hazards.

Also, from the perspective of Norwich City Council (NCC) as a landlord, the Housing Health and Safety Rating System (2006) requires that any dwelling to be free from 'any deficiency that can give rise to a hazard which interferes with, or puts at risk, the health and safety , or even the lives, of the occupants.'¹

It goes on to recommend the assessment of asbestos for repair, sealing, enclosure or removal. It advises that existing asbestos in good condition can be managed in-situ if unlikely to be disturbed and a record kept.

1.3 Asbestos register

1 The management plan needs an up-to-date asbestos register to work from.

¹ Housing Health and Safety Rating System, May 2006, page 5

NCC utilises an online asbestos register database, AI Toolkit solutions, which stakeholders can log on to. It is managed by NPS Norwich Ltd.

The register of asbestos containing materials (ACMs) needs to list location, extent, condition, product type and asbestos type. The asbestos register is a continuous live document.

Asbestos information is collated from programmed management surveys undertaken to increase knowledge of the council's asbestos liability, and also from targeted sampling and surveying commissioned by contractors to help plan their specific work streams.

Every identified or suspected ACM will have a material assessment based upon the product type, condition, surface treatment and asbestos type. Utilising the algorithm matrix described in HSG264², an assessment for the ACM can be categorised numerically.

A priority assessment, using a similar algorithm³, taking consideration of the hazard of asbestos disturbance can then be made. The assessment will take into account maintenance activities, likelihood of disturbance, human exposure potential and occupant activity.

The material (bulk) assessment and priority assessment can be added together to form a risk assessment.

1.4 Management action plan

The object of the management plan is to reduce the risk of exposure to airborne asbestos fibre.

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.

The management plan will utilise the risk assessments from the asbestos register to create a priority table for remedial work.

From this an action timetable will be developed to target which ACMs need immediate action (removal, encapsulation or enclosure).

The action timetable will highlight areas that need monitoring on a more than yearly basis pending further action.

² Asbestos: The survey guide, HSG264

³ HSG227, A Comprehensive Guide to Managing Asbestos in Premises.

The rationale for any management decisions must be part of the plan.

The plan shall also include monitoring arrangements, normally on a yearly basis. Removals tend to be responsive to other planned works or in response to individual survey or inspection results or reported queries.

An asbestos removal plan and budget is yet to be set, pending information gathered from the survey/inspection regime.

The collation of known data and rolling out of planned management surveys is expected to take a minimum of 5 years, but will always be a 'live' process with constant monitoring and regular updating.

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

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

The Property Services Managers will review the Action Plan.

Action Plans will be included within the AMP Review, and later retained as archive documents, kept by the Risk Surveyor.

1.5 Management options

- Communicate findings and instigate safe working systems;
- Monitor ACMs for damage/deterioration;
- Label/colour code ACMs;
- Protect/enclose ACMs;
- Seal/encapsulate ACMs;
- Repair ACMs;
- Remove ACMs;

The management rationale has the long term goal of reducing the asbestos liability to a minimum, with a short term goal of ensuring ACMs are in a safe condition.

1.6 Survey/inspection strategy

An asbestos survey is not an asbestos register or an asbestos management plan. CAR does not require surveys to be carried out; it requires an asbestos management plan to be put in place.

An asbestos survey is not a finished stand alone product; it is the start of a process leading to the enablement of the asbestos management plan.

Asbestos surveys shall be conducted by individuals with a minimum P402 BOHS qualification and any company engaged shall be UKAS compliant with ISO 17020 and ISO 17025.⁴

Historic information regarding non-domestic premises has been uploaded to the AI database. Communal area information regarding the housing stock is currently held electronically and is in the process of being uploaded to the AI database.

1.7 Non domestic premises

Premises under direct control of NCC will be subject to regular monitoring inspections of its asbestos liability by competent persons, who will report back any change or deterioration in the condition of ACMs.

NCC still has a duty of care for premises it leases out on full repair and maintenance tenancy agreements. As such it will require tenants and leaseholders to submit their own asbestos management plans for review.

These plans need not be an onerous exercise for tenants and leaseholders so long as they are suitable and sufficient.

NCC will still be responsible for any communal areas of leased properties.

When a leased property becomes vacant it will come back into NCC's maintenance remit. The AMP for that property will be reviewed and if necessary the property will be surveyed if information is felt to be incomplete.

1.8 Domestic housing

15% of the housing stock has been surveyed, prioritising properties built in the 1960s and 70s

Subsequent to the findings of the management survey reports, properties of a similar build type will be inspected. Any person conducting the inspections must be qualified to P402 BOHS and can demonstrate competence in the ability to recognise, and work safely with, asbestos.

Inspections will only use information gathered from a management type asbestos survey report with dwellings of the same build type and in the same block.

⁴ HSG227, A Comprehensive Guide to Managing Asbestos in Premises.

Any anomaly or difference from the survey report will be marked down as suspect ACM unless samples are taken for further analysis.

Likewise, any non-homogenous material (e.g. vinyl floor tile, textured coating) which may have been sampled as negative in the surveyed dwelling must be reported as suspect ACM in the inspected dwelling, unless sampled, or a cogent argument can be made as to why the material shouldn't be classed as suspect ACM (e.g. documentary evidence that the material was from the same batch and installed at the same time as the non-ACM in the surveyed dwelling).

1.9 Survey/inspection prioritisation

- Communal areas
- Survey/inspect dwellings built between 1960 – 1979
- Survey/inspect dwellings built after 1979
- Survey/inspect dwellings built between 1945 - 1959
- Survey/inspect dwellings built before 1945

1.10 Going forward

It is reiterated that asbestos will be left in place if in good condition and unlikely to be disturbed.

It is reiterated that exposure of airborne asbestos fibre release to tenants, repair and maintenance staff, NCC employees and the general public, is not to be tolerated and the management options previously mentioned will be utilised.

A departure from previous historic practice will be the repair of textured coatings containing asbestos. If a ceiling can be repaired and made good and left in a safe condition then this shall be a maintenance option to be considered before total removal. Also, dry lining a ceiling or wall containing textured coating is an acceptable management option.

Also, skimming over with plaster or ACM textured coating is an acceptable management option.

Likewise floor tiles may be left in place, with loose debris collected and bare areas made good.

To help NCC in the execution of their duty to manage, contractors and partners are reminded of their own duty of care and the need to be pro-active in the assessment of suspect ACMs, their condition and location.

Any unknown material is presumed to be asbestos. Sampling of suspect ACM is to prove a material doesn't contain asbestos or to solve an uncertainty.

Where a material is suspected or proven to contain asbestos an assessment must be made of its condition and its ability to release fibres if disturbed. A further assessment of the number and frequency of people at risk from exposure is made. This will help guide the measures needed to be taken to maintain asbestos in good condition and prioritise actions in order of potential risk.⁵

2. ORGANISATION AND RESPONSIBILITIES

Whilst responsibility for all Health and Safety matters rests ultimately with the Chief Executive Officer of Norwich City Council, the structure for ensuring compliance with the Regulations is illustrated below:

Deputy Chief Executive Officer is the nominated **Duty Holder** and is responsible for ensuring that:

- The Asbestos Management Plan is implemented.
- Adequate resources are provided and allocated to carry out the Plan.
- The Council employs contractors for work with ACMs in accordance with procedures within the Plan and NCC corporate procedures.
- The necessary requirements for the safe management of ACMs are fully identified and incorporated into any design or specification.
- The implementation of the AMP is monitored to ensure that working arrangements and provision of financial, technical, human and other resources are suitable and sufficient to meet its requirement.
- Project Managers are aware of the Plan, and have the necessary skills to implement their responsibilities under the Plan.
- Ensuring any breaches of compliance with the AMP are fully investigated.

The Duty Holder has delegated the execution of these tasks (but not the responsibility) to **NPS Norwich Ltd.**

The Operational Director and the **Strategic and Operational Heads of Service** of NPS Norwich Ltd. decide the overall strategy and direction of repairs, maintenance and programmed works on behalf of NCC. They are responsible for allocation of budget and resources, ensuring staff are competent and suitably qualified to their allocated roles.

NPS Norwich Ltd. have appointed a **Senior Risk Surveyor** (Risk Surveyor) to ensure that:

- Information on ACMs is appropriately stored and is made available to all interested Parties.

⁵ Refer to HSG264; L127 Management of Asbestos in Non-Domestic Premises; DETR, Asbestos and Man-made Fibres in Buildings

- Appropriate records of asbestos works are properly kept.
- The Asbestos Register is maintained and regular audits of the Asbestos Register are undertaken.
- Re-inspections of all ACMs are carried out on a regular basis.
- Following risk assessment ACMs are assigned appropriate management options and priority actions are timetabled.
- Arrangements are made so that Council employees have the necessary facilities, training and allied competencies to discharge the duties assigned to them under the Plan.
- 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.
- The performance of the Plan is annually reviewed and amended as necessary.
- Emergency procedures are established.
- Arrangements are made to ensure we have a competent Licensed Asbestos Removal Contractor and Analytical Company approved for use on sites.
- General ACM Management.
- Procuring appropriate level of investigation or similar in response to an enquiry and providing a documented report.
- Identifying ACMs as required, undertaking formal risk assessment and updating the Asbestos Register.
- Ensuring that, where ACMs are removed, or remain in-situ under a monitoring regime, the Asbestos Register is updated.
- Assessing, reviewing and recommending management actions in light of inspection findings and changes in Regulations or current good practice.
- Reviewing and amending where necessary standards of works detailed in the Council general specification for works with ACMs.
- Organising and undertaking a regular inspection of ACMs.
- Recommending and specifying programmes of work for asbestos management specific projects.
- Reacting to and managing any asbestos incidents and then reporting incidents to the Senior Health & Safety Officer and completing Dangerous Occurrences forms as necessary. Advising on management of remedial works.
- Advising on specification for asbestos remedial works and issuing to the Project Manager.
- Assessing Asbestos Contractor's Plan of Works and recommending selection where applicable.
- Informing the Project Manager of asbestos remedial works implications.
- Assessing the appropriate level of analytical support and attendance.
- Informing appropriate staff of asbestos related works in good time.
- Organising where appropriate an asbestos contract pre-start meeting to agree the Plan of Works, attended generally by the Risk Surveyor, Contractor and Analyst.
- Monitoring Asbestos Contractors to assess their compliance with statutory

- requirements, reporting and discussing deficiencies with the Project Manager.
- Stopping work where an Asbestos Contractor does not perform to the required health and safety standards.
- Reviewing reports by the Analyst.
- General and financial administration tasks.
- Providing cost estimates for asbestos works.
- Assessing invoices prior to authorisation by the Project Manager.
- Information, liaison and education:
- Reviewing with the Senior Health & Safety Officer and Team Leaders (Property Services) proposed regulatory changes and current standards of good practice.
- Providing expert advice on ACMs and their treatment to those with responsibility under this AMP.
- Participating in the organisation and delivery of asbestos awareness seminars.
- Attending Progress Meetings where required.
- Providing the HSE and similar bodies with details of asbestos management procedures and projects where relevant.
- Record keeping: Updating the Asbestos Register.
- Auditing contractors and consultants in relation to asbestos works.
- Ensuring that all statutory documents generated by the works are properly completed and a record kept.
- Keeping detailed project records relating to asbestos remedial or investigative works.
- Providing the Project Manager with an Asbestos Works Completion statement when appropriate.

Project Managers For the purpose of this document a Project Manager is defined as any person co-ordinating works on behalf of NCC. The Project Manager is responsible for ensuring that:

- Areas are assessed for ACMs at the feasibility stage of a project. Guidance on the assessment required is given in HSG264.
- All appropriate actions within the AMP are implemented.
- All project personnel are informed of the location of any known ACMs affecting the project.
- Local arrangements are made with building users and service providers to facilitate asbestos works.
- Works are halted if suspect ACMs are discovered during the course of work and further information is sought from the Risk Surveyor or independent professional advisor.
- Informing the Risk Surveyor of any changes or removals of ACMs so the asbestos register can be updated.

Contract Administrator has overall control of a specific contract and:

- Overseeing and ensuring work is carried out and completed in accordance with contract specification and terms and conditions.
- Often performs same role as Project Manager overseeing project within a contract.

Asbestos Contractors are responsible for:

- Complying with current legislation, associated Approved Codes of Practice and Guidance and the AMP and Project Procedures.
- Attending site to assess and prepare quotations against asbestos remedial work specifications, the Asbestos Contractor to raise any issues relating to the health and safety aspects or potential costs of a project.
- Providing a Plan of Work to the Project Manager (and the HSE or local enforcement authority if appropriate). This to include details of project resources and timetable and an emergency procedure discussed and agreed with the Project Manager.
- Providing Statutory Notice to the Statutory Authority prior to commencing asbestos works, or, by agreement and at the request of the Project Manager, applying for a waiver from the minimum notice.
- Attending the asbestos contract pre-start meeting, Progress Meetings, and handover Meeting as required.
- Carrying out regular inspections of the work environment, any defects found by or reported to the Project Manager or Analyst being rectified by the Contractor immediately.
- Complying with all reasonable requests from the Project Manager.
- Complying with Permits to Work.
- Liaising with the Analyst to ensure the satisfactory progress of the works.
- Providing copies of notification and consignment notes and other relevant documentation with final account to the Project Manager.

Analysts are responsible for:

- Maintaining UKAS accreditation relevant to instructed tasks.
- Providing pro-active support to the Project Manager, but to a level which would not fall within the HSE requirement for a supervisory License when requested by the Project Manager.
- Reviewing and commenting on asbestos works specifications and, prior to start of the works, on the Contractors Plan of Work.
- Providing quotations which reflect the anticipated project site and analytical requirements.
- Attending meetings, including but not restricted to, pre-start, Project Progress and Handover Meetings.
- Completing check lists, warning and advisory signs etc. as supplied by the

Project Manager.

- Assisting with the application and completion of Council specified permits and warning signs etc., relevant to the asbestos remedial project, including hot works permits etc.
- Carrying out analytical works and inspections as agreed with the Project Manager.
- Where site conditions alter, and the Project Manager is not immediately available, the Analyst should adjust the level of testing and inspection to ensure that all information relevant to the continued health and safety of the Contractor and building occupants is obtained.
- Reporting to the Project Manager any defects or non-compliances relating to the Contractors performance, including suitability of the work areas, adherence to the Plan of Work, Statutory Instruments and AMP. Where the Project Manager is not immediately available the Analyst to take any measures necessary to ensure the health and safety of the Contractor and building occupants.
- Checking areas on completion of asbestos remedial works to ensure that the Contractor has completed his scope of works and all affected areas have been left in a satisfactory condition.
- Maintaining regular contact, as minimum at start and at end of each site day, with the Project Manager, regarding progress of site works.
- Reporting to the Project Manager any aspects of asbestos management encountered on site which could give rise to health risks.
- Providing daily written reports on project progress to the Project Manager; the reports to include such information, in excess of accreditation requirements, as requested by the Project Manager.
- Issuing formal Reports, including 4 Stage Clearance and Certificate of Re-Occupation, to the Project Manager on completion of site works.
- Completing the log sheet within paper copy of the asbestos register extract kept at each property.

Heads of Service, within NCC and NPS Norwich Ltd. are responsible for ensuring that:

- All staff and visitors are aware of their individual responsibilities regarding this AMP.
- The service implements any measures deemed necessary by the Risk Surveyor.

Staff are responsible for:

- Reporting to Property services 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
- Attending asbestos awareness training when so requested.
- Working in a safe manner that does not expose themselves, colleagues or

members of the public to harm.

General Contractors are responsible for:

- Ensuring that they respond to, and maintain, all communications with Project Managers.
- Compliance with the AMP and relevant procedures, and where acting as sole, main or principal contractor to have a thorough understanding of these procedures.
- Ensuring that contractors' employees and all sub contractors are informed of the AMP and relevant procedures, and are aware of the location of ACMs within the project area.
- Ensuring that contractors' employees and all sub contractors have adequate asbestos awareness training.
- Co-operating with any Licensed Asbestos Removal Contractors or associated contractors working within or adjacent the known or intended project area.
- Ensuring that emergency measures are in place for exposure to any suspected or known ACMs and that these are in line with procedures.
- Ensuring that safe systems of work are in place for possible disturbance of non-licensed ACM.
- Ensuring that contractors' employees and all sub contractors work in a safe manner that does not expose themselves, colleagues or members of the public to harm.

The Senior Health & Safety Officer is responsible for:

- Reporting all incidents to the Health and Safety Executive under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR).
- Collating Dangerous Occurrence Forms.
- Undertaking an auditing role on representative projects – including aspects of Asbestos Manager, Asbestos Contractor and Analyst performance.

The CDM Co-ordinator is responsible for:

- Notifying Projects which last more than 30 working days, or involve more than 500 person days, for example 50 people working for over 10 days.
- Giving suitable and sufficient advice and assistance to clients in order to help them comply with their duties.
- Providing the principle contractor with pre-construction information to enable the principle contractor to develop the Construction Phase Plan.
- Advising the client on the suitability of the principle contractor and contractors who will be working on the project.
- Advising the client the Construction Phase Plan is suitable and sufficient to proceed with the construction phase.
- Ensuring the construction phase plan is adequate for construction projects.

- Providing statutory notice to the relevant statutory licensing authority.

3. ASBESTOS REGISTER

3.0 Purpose of register

The Register records known and suspected ACMs in NCC's property portfolio where NCC has a maintenance and repairing liability.

It contains information on their:

- Location
- Type of ACM
- Level of Identification
- Extent
- Condition

The Register is aligned with the requirements of the Control of Asbestos Regulations, 2012. Information recorded allows objective risk assessments to be carried out.

The Register also provides some detail on:

- Non ACMs where, in the normal course of the building operation, they may be confused with ACMs, for example artex, gaskets, fibre cement boards.
- Areas which have not been surveyed.
- The presumption must be made that ACMs may be present in all unsurveyed areas and for all surveyed areas where the location would not have fallen within the scope of the original survey inspection.

3.1 Drawings

Drawings may be used to illustrate the Register information; these will be colour marked up and subject to update procedures. Drawings are not currently part of the formal issued Register.

3.2 Storage

The Register is stored electronically, including archive.

3.3 Availability

The Asbestos Register is available to all who may reasonably require such information via the intranet for internal staff and internet for others. Other enquirers should go through NPS Norwich Ltd.

Paper copies of the relevant extract for a property will be deposited at the property for easy access by contractors or any other person requiring information about ACMs in the building.

In the absence of a paper copy enquirers should be referred to NPS Norwich Ltd.

3.4 Updates

The responsibility for updating the register is the Risk Surveyor's. It is the duty of individuals, departments or organisations who affect data in the Register to supply relevant information to the Risk Surveyor.

Update may be required after:

- Identification of further ACMs
- Surveys
- Removal of ACMs – consignment notes must be provided to the Risk Surveyor, or encapsulation/over boarding
- Inspection/monitoring exercises
- Changes in building layout or area use

It is the duty of the surveyor to record that an inspection has been made on the paper copy of the register at each individual property. Paper copies will be changed only if a material change is recorded to the ACM contained within the building.

At the AMP review the Operational Director will assess the range and quantity of amendments received.

3.5 Audit

Regular Register audits will be conducted on a regular basis by the Senior Risk Surveyor. 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.

4. IDENTIFICATION AND RISK ASSESSMENT OF ACM'S

4.0 Requirement

Surveys and re-inspections are carried out to comply with HSE guidance, HSG264, 'Asbestos: The survey guide.' An appropriately accredited surveying company carries out surveys with the works managed by the appropriate Project Manager.

Survey types are detailed in HSG264 and HSG 227 'Managing asbestos in premises', a summary is given below:

4.1 Management surveys (previously known as type 1 or 2)

The entire building or area is inspected, as far as reasonably practicable. Any materials found, which can be reasonably expected to contain asbestos, are presumed to contain asbestos and are subject to risk assessment. Samples of material can be taken for analysis.

The survey attempts to inspect all normally accessible areas or, where not accessed, the area is presumed to contain asbestos. Representative samples of suspect materials are collected, analysed and assessed. Building services, such as pipework, ductwork, are inspected where accessible. Typically a management survey is chosen prior to redecoration or minor projects where only the surface of the building fabric will be affected by the project.

4.2 Refurbishment/demolition surveys (previously known as type 3)

The aim is to locate and describe, as far as reasonably practicable, all ACMs in an area. This investigation is likely to result in at least decorative damage to areas, and where relevant opening up of bulkheads, full depth investigation of partition walls etc. Making good after survey works is minimal unless requested otherwise.

Materials are sampled to identify their asbestos content, and the surveyor will estimate the extent of the material. The condition of the ACMs is generally not reported except where materials are damaged or if areas of asbestos debris may be expected.

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

- area is unoccupied.
- 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. If these conditions are not met it is probable that the survey carried out will be of management level, with detail to refurbishment level given only to fully accessed areas. Further survey work, to refurbishment level, would then be required when suitable site conditions are available.

A refurbishment/demolition survey is required where demolition or penetration of building fabric or services is anticipated. During demolition it is possible for further ACMs to be identified and further survey works to demolition would be required.

4.3 ACM's in equipment

ACMs have frequently been used in scientific or technical equipment. Asbestos fibres have a range of properties - insulating, non-electrical conductive, resistance to acid – which made them suitable for many uses including flash guards in electrical distribution boxes, heating panels in some heaters and gaskets, acoustic sink pads.

It is the responsibility of the Head of Service to have asbestos containing service equipment, materials and apparatus, appropriately recorded and managed.

4.4 Risk assessment of ACM's

It is a requirement of the Health and Safety at Work Act 1974 that work must be carried out in a safe manner (whether notifiable or not). To this end it is always necessary to conduct an assessment of works prior to commencement.

With regard to general responsive operations or programmed work an assessment must be made as to whether asbestos will be disturbed and if this disturbance will be likely to release airborne fibre in concentrations greater than 0.01f/ml.

Unless there is evidence to the contrary a material is always presumed to contain asbestos.

Procedures and policies must be put in place that enables correct assessments of a material to be made, including risk assessments of the potential hazard the material might cause.

'Bulk' sampling of a material to send to a laboratory is to confirm that a material contains asbestos; until the results come back it is presumed the material contains asbestos.

Only competent persons should take a 'bulk' sample, to ensure the sample is taken safely and correctly.

4.5 initial assessment

Any operative or tenant who discovers a material of unknown provenance must assume it is asbestos and react accordingly.

Issues of health and safety are *not* put on hold until laboratory analysis confirms or denies the presence of asbestos. If a material assessment indicates that minor disturbance could release airborne asbestos fibre then make safe procedures should be put in place immediately.

Contractors need not refer back to Norwich City Council to put temporary make-safe procedures in place.

If no information is available about the suspect material on the Asbestos Register, then the Contractor can arrange for bulk sampling to be conducted without referring in the first instance to Norwich City Council.

4.6 Material assessment

To make a correct assessment of a material's ability to release fibres it is necessary to take into consideration certain characteristics of the material, other than just whether it contains asbestos or not.

The first consideration is the product type;

- Is it a product that contains asbestos in a well bonded matrix such as plastics, vinyl floor tiles, textured coating or cement sheet?
- Is it an insulation board or mill board or gasket or paper, where fibre can be released quite easily if disturbed?
- Or thermal insulation such as pipe lagging which readily releases fibre if disturbed?

The 2nd consideration is the condition of the material;

- It can be judged as good, low damage, medium damage or high damage (including visible debris).

The 3rd consideration is the surface treatment of the material;

- A well bonded material such as a plastic or textured coating will not really have any benefit from a surface treatment.
- Insulation board is more protected if it is encapsulated, sprays and laggings if they are physically enclosed.
- Unsealed/unpainted insulation board and encapsulated lagging or spray is a greater risk.

The greatest risk is raw, unsealed lagging or sprayed asbestos ('limpet')

Although control limits are the same for all asbestos types it is tacitly recognised that chrysotile (white) poses a potentially lower health risk than amosite (brown) which has a potentially lower risk than crocidolite.

Prior to taking a sample, or just using a visual identification, one should presume asbestos content to be crocidolite, unless a reasoned argument can be made otherwise (e.g. asbestos insulating board is predominantly amosite, as is the asbestos in Shires type toilet cisterns; textured coating contains nearly always chrysotile. Please note the 'predominantly' and 'nearly always').

The 4 factors above can be expressed in a numerical algorithm⁶ as the material assessment score (MAS)

Further guidance on bulk sampling is available from HSG 264⁷ and Appendix D.

4.7 Disturbance or priority assessment

Having conducted a material assessment (all prior to taking a 'bulk' sample) of the potential to release airborne fibre, further assessments can be made to the likelihood of fibre release.

This takes into the consideration the position of the material;

- Is it outdoors?
- In a large well ventilated room?
- Smaller room?
- Confined space?

How accessible is the material?

- Unlikely to be disturbed?
- Occasionally likely to be disturbed?
- Easily disturbed?
- Routinely disturbed?

Final consideration is the amount;

- Small amount such as string, gaskets.
- Less than 10m² or 10 linear metres
- More than 10m² or 10 linear metres
- More than 50m² or 50 linear metres

The 4 factors above can be expressed in a numerical algorithm⁸ as the priority assessment score (PAS)

An assessment should always be made prior to commencing work, including taking a 'bulk' sample for laboratory analysis. It is not always necessary to take a sample to make an assessment on a material.

With regard to general responsive operations or programmed work an assessment must be made as to whether asbestos containing materials will be disturbed and if this

⁶ See HSG248: The Analysts Guide

⁷ HSG264 Asbestos: The Survey Guide

⁸ See HSG227, a comprehensive guide to managing asbestos in premises.

disturbance will be likely to release airborne asbestos fibres in concentrations greater than 0.01f/ml.

If the assessment flags up that there is a potential risk of airborne fibre release if the material is disturbed during normal activities then the correct 'make safe' actions must be implemented immediately, even if subsequent laboratory analysis records a negative result.

Anybody taking a sample to be sent for bulk analysis must be competent to take the sample safely. If they are competent to take the sample they must also, by default, be competent to make the assessment.

Unless there is evidence to the contrary a material is always presumed to contain asbestos.

'Bulk' sampling of a material to send to a laboratory is to confirm (or not) that a material contains asbestos; until the results come back it is presumed the material contains asbestos.

Guidance on bulk sampling procedure is contained in Appendix E.

5. MANAGEMENT OF ACM'S

5.0 Background

The Control of Asbestos at Work Regulations (CAWR) 2002 stipulated that work on asbestos insulating products or coatings required (with minor exceptions) a licence and notification to the HSE. Textured coating ('Artex' type coatings) was notifiable. Non-insulating products such as vinyl floor tiles, asbestos cement, and roofing felt, etc. did not require a licence or notification, but still had to be dealt with in accordance with the regulations.

CAWR was superseded in 2006 by the Control of Asbestos Regulations (CAR). The exceptions to notification and licence requirements are noted in Regulation 3, para.2 i.e.:

- Materials in which the asbestos fibres are firmly linked in a matrix; such as asbestos cement, textured coating, plastics, bitumous products, vinyl tiles etc.;
- An asbestos fibre in air concentration control limit of 0.1fml measured over 4 hours must be met.
- Any work on asbestos containing material (ACM) must be deemed to have an asbestos fibre exposure that is sporadic and of low intensity. Any work on ACM where asbestos fibre in air concentrations will be less than 0.6f/ml measured over a 10 minute period will be deemed to be sporadic and of low intensity.
- Work with asbestos insulation products (with the exception of encapsulation)

can only be classed as non notifiable if the exposure to asbestos fibre is sporadic and of low intensity and of short duration. Short duration is described as work taking less than 1 hour in every 7 day period per person. Total work on the asbestos insulation should not exceed 2 hours.

An update to CAR in 2012 introduced a 3rd category for working with asbestos containing materials, Notifiable non-licensed work, an explanation of which is given in Appendix A.

It is re-iterated that exemption from notification and licensing does not exempt persons from the Control of Asbestos Regulations and its requirements.

5.1 Prioritisation

Reference to the asbestos register and management plan should be used in the allocation of resources, using the risk assessment algorithm.

Debris should always be removed, regardless of the type of ACM.

Any damaged ACM should always be made safe. This does not necessarily mean removal. Repair and encapsulation are valid methods of asbestos management.

Where the ACM has minor damage, 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. These encapsulants are typically polymeric applications which dry to give a robust water resistant surface. Repairs and any encapsulation measures will be undertaken by either a Licensed Asbestos Contractor or suitably qualified unlicensed contractors if the work has been assessed to be non-notifiable and unlikely to result in asbestos exposures of greater concentration of 0.01 f/ml, with the local area being isolated, either by constructing an enclosure, mini-enclosure or using local exclusion techniques.

5.2 Management goals

The long term strategy is to remove the asbestos liability; commencing with the ACMs that have the highest material and priority risk scores.

The short term strategy is to manage asbestos in place safely.

5.3 Maintenance options for ACM's

Bitumous coatings

Roofing felts and DPCs can be left in place and monitored for damage and deterioration.

'Shires' type toilet cisterns

In good condition these can be left in place and monitored for damage and deterioration.

Floor tiles

In good condition these can be left in place and monitored for damage and deterioration. If under another floor covering their presence will be noted in the asbestos register and flagged up for monitoring should they be disturbed.

Floor tiles which have been subject to some damage will have any debris removed. Damaged areas will be made good. The repairing of damaged areas is not to contain loose fibres but evidence that NCC is maintaining and managing ACM.

Textured coatings ('Artex' type coatings)

In good condition this can be left in place and monitored for damage and deterioration. Loose flaky textured coating is unlikely to release asbestos fibre, but left in that state is evidence that NCC is not maintaining or monitoring ACM correctly. With minor damage (such as after a water leak) it is possible to remove the loose coating and reseal without removing the coating from the whole ceiling/wall.⁹

From a management rationale it is quite acceptable to skim over textured coating or cover in plasterboard. The presence of asbestos containing textured coating will be noted on the asbestos register, flagged up for monitoring should it be disturbed.

Asbestos cement

In good condition this can be left in place and monitored for damage and deterioration. It can be painted¹⁰ or plastered over, its presence noted on the asbestos register. Damaged asbestos cement¹¹ must be attended to. Please note that cement board is fragile and susceptible to damage, so removal from inside a dwelling is to be recommended.

Asbestos textiles and gaskets

In good condition these can be left in place and monitored for damage and deterioration; if they are to be disturbed during maintenance it is as well to remove them.¹²

Asbestos insulating board (AIB)

Any AIB within a dwelling should be sealed¹³, enclosed¹⁴ or removed. It is not

⁹ Non-licensed task A28, Asbestos essentials, HSG210

¹⁰ Non-licensed task A16, Asbestos essentials, HSG210

¹¹ Non-licensed task A13, Asbestos essentials, HSG210

¹² Non-licensed task A25, Asbestos essentials, HSG210

acceptable to have raw unpainted board within a dwelling.

Any damaged board must be repaired immediately, utilising a pva spray, 'liquid nails' and/or duct tape.¹⁵ After the repair a review will be conducted whether to monitor, effect a more permanent repair, or removal.

AIB soffit should be monitored for damage and deterioration. It is perfectly acceptable to paint it.

Lagging

If left in place the lagging must be encapsulated or enclosed, labelled and monitored and a permit to work system put in operation.

Debris

All debris will be removed as a matter of priority.

Air monitoring

Air monitoring to measure the asbestos fibre concentration in air is mandatory when licensed removal work has occurred.¹⁶

It is also to be recommended when accidental damage has occurred or non-licensed repairs have taken place.

Air monitoring should only be undertaken by an independent UKAS accredited company.

Testing/Sampling

Bulk samples will only be taken by competent persons with correct PPE, RPE. On taking the sample an assessment will be made as to the material condition and any risk posed¹⁷. The sampled material will always be left in a safe condition (this could mean immediate encapsulation, prior to results being known).

Any material must be assumed to contain asbestos unless there is evidence to the contrary (e.g. glass, wood, metal, a material whose provenance is known not to contain asbestos).

If there is no information in the Norwich City Council database or asbestos register then EITHER:

¹³ Non-licensed task A7, Asbestos essentials, HSG210

¹⁴ Non-licensed task A8, Asbestos essentials, HSG210

¹⁵ Non-licensed task A6, Asbestos essentials, HSG210

¹⁶ HSG248

¹⁷ As described in HSG264, The Surveyors Guide, 'Material Assessment'

Sample analysis must be conducted by a UKAS accredited laboratory prior to the commencement of work which might disturb the material. Results to be transmitted to all interested parties and added to Norwich City Council's asbestos register.

OR:

Work will proceed with the assumption that the material does contain asbestos and a method statement and plan of work are produced prior to commencement of work.

The 2nd option will only be utilised once a risk assessment has been made that work with the suspect asbestos containing material will only create an exposure to asbestos fibre that is sporadic and of low intensity and of short duration.

It is re-iterated that exemption from notification and licensing does not exempt persons from the Control of Asbestos Regulations and its requirements.

Removal Works

Licensed Asbestos Removal Contractors.

Remedial works to ACMs, including encapsulation, will generally be carried out by a contractor holding Licensed Asbestos Removal Contractors.

Audits of contractors undertaking work with ACMs may be carried out by the risk surveyor. Such audits will include assessment of at least:

- Quality of completed work
- Plan of works, method statements and risk assessments.
- Safety issues throughout the remedial works
- Compliance with contractor's own safety management systems
- Feedback and safety etc. information from the UKAS accredited consultancy engaged for the associated inspection and analytical works
- Adherence to programme

Audits of contractors undertaking work with ACMs may be carried out by the risk surveyor. Such audits will include assessment of at least:

- Quality of completed work
- Plan of works, method statements and risk assessments.
- Safety issues throughout the remedial works
- Compliance with contractor's own safety management systems
- Feedback and safety etc. information from the UKAS accredited consultancy engaged for the associated inspection and analytical works
- Adherence to programme

5.4 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.

5.5 Completion of asbestos works

Documentary evidence of correct removal and disposal must be provided to the Senior Risk Surveyor who can then ensure the asbestos register is updated. This should consist of:

- A clear summary of what materials have been removed
- Project references
- Contact and documentation details
- Comment on residual asbestos risks.
- Works specification
- Removal method statement
- Air monitoring reports
- Certificate of Re-Occupation with 4 Stage Clearance documentation (where relevant)
- Waste consignment notes

Records will be held for an appropriate period.

5.6 Labelling

Labels will not normally be applied for the following reasons:

- Sticky labels can be deliberately picked up and moved to non-ACMs
- Labelled ACMs are more vulnerable to malicious damage
- Where there is a policy of labelling this can engender complacency – if it is not labelled then it must be safe. It is better to reinforce the practice of always consulting the Asbestos Register.

6. PROJECT MANAGEMENT PROCEDURES

6.0 Background

Under **CDM** ¹⁸regulations Norwich City Council as client has a duty to provide pre-construction information about or affecting the site or the construction work and any information in any existing health & safety file.

If no information is available from Norwich City Council then a management type asbestos survey must be conducted prior to commencement of work. In some cases a fully invasive refurbishment/demolition survey will need to be conducted. Survey results will be transmitted to all interested parties and added to Norwich City Council's asbestos register.

In cases where the programmed works are repeated in similar build types, it may be allowed for representative surveying to be conducted. However, all buildings within the works programme will be subject to inspection by suitably qualified personnel.

Sufficient lead time in the planning of major works must be factored to enable prophylactic or removal work to be carried out upon asbestos containing materials if necessary.

All employees and contractors must be asbestos awareness trained.

Any work that disturbs asbestos containing materials must have a method statement and plan of work

Any asbestos containing material not covered by the exceptions stated in Reg. 3 Para 2 of the CAR 2012 can only be worked upon by licensed contractors and will be notifiable to the HSE.

All works within the Council 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
- Control measures to be taken to avoid damage or exposure
- Any necessary remedial/removal works
- Potential impact on project programme.

This review is to be at a level appropriate for the project in terms of its scale of refurbishment, known asbestos data, and regulatory requirements. The Project Manager is expected to seek guidance from the Risk Surveyor, or CDM co-ordinator, and make use of specialist asbestos consultancy services where relevant.

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. Discussions on

¹⁸ Construction and Design Regulations, 2007

project design and site inspections may be required dependant on scale of project.

The health and safety file may include:

- Information on known ACMs
- Level of site investigation required, for example any requirement for management or refurbishment/demolition surveys, including their impact on occupants and project timetable
- Requirement for services isolations
- Requirement for space e.g. contractors welfare, decontamination unit, analytical office etc.
- Requirement for additional services e.g. use of a licensed scaffold contractor to provide access.

The final report and content will be dependent on the complexity of the project and may include an asbestos survey report with marked up plans; guidance on remedial measures required, including any control measures, such as protection or labelling of ACMs; and budgets may be included.

This information will be given to the CDM co-ordinator.

Where remedial works are required this may include:

- Remedial/removal works being undertaken to ACMs *not directly* affected by the project scope, but which lie within, or directly adjacent to, the project location. The intention being to use the refurbishment period to improve the Council environment, with minimal disruption to building use. Such remedial works will normally be funded by the project.
- Co-operation with programming of the works, for example, the preference that asbestos remedial works are carried out as a priority activity either prior to the main contractor taking possession of the site or at the start of the possession period.
- Assisting in making space available for asbestos remedial works equipment, such as parking for decontamination units (DCUs), appropriate office space for the analyst.
- Arranging any necessary services isolations or enabling works – such as cutting out of non-asbestos redundant ductwork, removal of fixtures, fittings, furniture or certain building features.

6.1 Informing project personnel

Aspects to be considered include:

- Site handover arrangements comprising documentation such as the risk assessment report, asbestos works completion statements etc.

- Site familiarisation walks with key personnel such as site foreman, CDM co-ordinator et al.
- Particular attention to co-operation and co-ordination where contractors who do not hold an HSE license for asbestos works are used for enabling works prior to asbestos remedial works being undertaken. It is essential that these 'non-asbestos' contractors are
- aware of any risks and related controls
- undertaking only enabling works (e.g. 'soft strip') that are sufficient to provide necessary access etc for the future asbestos licensed contractors works

6.2 Additional or suspect ACM's

Anyone working on a project is responsible for making sure works are halted if suspect ACMs are discovered and that further advice is sought.

In practice, it may be the site manager who takes the first action of stopping works to the affected areas. They should then contact the project manager. Further guidance can be obtained from the risk surveyor whose decision is final.

6.3 Removal/remediation work

It is acknowledged that safe systems of work can be generated to work upon ACMs with low friability by non-licensed contractors, providing competence and adherence to CAR 2012 can be demonstrated. However, generally only licensed asbestos contractors will be used for removal and remedial work.

7. INFORMATION AND TRAINING

7.0 Information

Information on the AMP and the management of ACMs will be available to all relevant personnel and organisations. General and Council specific information may be posted on relevant notice boards or produced for distribution in electronic format.

Where more specialist knowledge is required this may be sourced from specialist consultancies and publications, including HSE documents.

7.1 Enquiries

No advice is given to the public. Enquiries should be related to Council owned property.

In the event of an asbestos enquiry the initial action should be to refer to the Asbestos Register.

If this does not answer the query then NPS Norwich Ltd. should be contacted and they

will defer to the Senior Risk Surveyor or the heads of service.

7.2 Training

It is acknowledged that effective management of ACMs requires knowledge of a specialised area of health, safety and construction works.

The Operational Director will ensure that a suitable level of expertise is available; 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.

The Operational Director and Human Resources assess training requirements and co-ordinate it's provision.

The intention is to provide an open and responsive culture where individuals have an awareness of the risks and an appreciation of the effectiveness and suitability of, and requirement for, management procedures.

The key areas covered by in-house training sessions are:

- AMP - purpose, general arrangements, availability and location, responsibilities of employees and key groups
- Asbestos Register - location, use and availability
- ACMs - health effects and their range and distribution within Council buildings
- Work practice - safe systems and arrangements

It is acknowledged that high risk groups, such as new employees, newly appointed contractors etc., may require asbestos awareness training or similar as part of their initial induction process. It is a legal requirement that employees and contractors have asbestos awareness training

In summary:

- All employees and contractors should have asbestos awareness/training.
- Continuing asbestos awareness/training will be carried out as necessary
- Problems or incidents with ACMs will be investigated and a review of training arrangements carried out if considered appropriate.

Human Resources will keep details of training agenda and dates for Council staff.

Training review

The Operational Director will review the training arrangements annually to assess if:

- All individuals/department/groups requiring training have been identified
- Re-training requirements are adequate
- Council induction arrangements are adequate
- Course content is appropriate.

8. REVIEW OF THE ASBESTOS MANAGEMENT PLAN

The intention of the review will be to assess:

- Management procedures and their effectiveness.
- Effectiveness of the management plan in terms of its integration into all matters relating to the building fabric and use
- Overall progress made against the Action Plan
- Suitability and maintenance of communication, instruction, training of personnel, employees and contractors
- Suitability and success of record keeping tasks

Significant findings and comments will be reported to the Head of Property Services. A record of the Review will be kept by the Risk Surveyor.

Review Timetable: The Heads of Service will set the timetable and date of the next review.

A Review will be:

- Carried out on a 12 monthly basis or
- Considered when significant events occur - for example, following accidental exposure of personnel to significant airborne asbestos fibre levels, transfer or increase of premises, or if arrangements within the AMP are no longer considered to be adequate.
- Following changes in legislation.

Review Attendees: The Heads of Service will invite appropriate representatives.

Review Agenda: The Heads of Service will set the Agenda and will distribute to all relevant personnel in sufficient time for data and feedback to be collated.

The agenda will include some or all of the areas set out below:

- Compliance with HSE and internal procedures
- Management and Organisation structure
- Audits and Reports
- Action Plan
- Remedial Works

- Asbestos Register
- Asbestos awareness/training
- Incidents with ACMs
- HSE reports

9. GUIDANCE TO CONTRACTORS

Refer also to Section 5, 'Management of ACMs', and HSE guides HSG210, HSG 264 et al.)

9.0 Notifiable, non-notifiable work, and notifiable non-licensed work

When a contractor's operative is carrying out responsive or planned repairs in premises in which Norwich City Council is duty holder, then that area becomes a place of work and is covered by the Control of Asbestos Regulations (CAR), 2012, and general Health and Safety at Work Act (1974) requirements, including Management of Health and Safety at Work Regulations (1999), Workplace (Health, Safety and Welfare) Regulations (1992) which impose a duty upon the employer to protect workers and occupants from uncontrolled risks and hazards.

Work with asbestos is defined as any work that consists of the removal, repair or disturbance of asbestos, or work that is ancillary or supervisory to this.¹⁹

Generally most work with asbestos is notifiable to the HSE and would need to be carried out by a licensed contractor.

However, there are exemptions to notification and using licensed contractors²⁰:

Work with asbestos is non-notifiable and does not require a licence if the materials in which the asbestos is contained has the fibres firmly linked in a matrix; such as **asbestos cement, textured coating, plastics, bitumous products, vinyl tiles** etc.; generally products that have a non-insulation purpose.

The work must be of a sporadic and of low intensity nature, and a risk assessment should conclude that the asbestos fibre in air concentration does not exceed the control limit of or $0.6\text{f}/\text{cm}^3$ measured over 10 minutes (or $0.1\text{f}/\text{cm}^3$ measured over 4 hours), during the disturbance of the asbestos containing material (ACM).

A 3rd category is Notifiable Non-licensed Work, where work is beyond normal maintenance activity. HSE guidance is contained in Appendix A

Exemption from notification and licensing does not exempt persons from the Control of Asbestos Regulations and its requirements. Contractors and employees should have suitable and sufficient training to conduct such work.

¹⁹ Control of Asbestos Regulations, 2006, Reg. 2

²⁰ Control of Asbestos Regulations, 2006, Reg. 3, para 2

9.1 Major works

Under Construction (Design & Management) Regulations (CDM)²¹, Norwich City Council as client has a duty to provide pre-construction information about or affecting the site or the construction work and any information in any existing health & safety file.

Contractors will be aware that if no information has been made available from Norwich City Council then a management type asbestos survey²² should be conducted prior to commencement of work. In some cases a fully invasive refurbishment/pre-demolition type survey²³ will need to be conducted. Survey results will be transmitted to all interested parties and added to Norwich City Council's asbestos register.

Nb. Contractors must be aware that even a Refurbishment and Demolition survey may not discover all asbestos containing materials in an occupied building.

In cases where the programmed works are repeated in similar build types, it may be allowed for representative surveying to be conducted. However, all buildings within the works programme will be subject to inspection by suitably competent personnel.

Sufficient lead time in the planning of major works must be factored to enable prophylactic or removal work to be carried out upon asbestos containing materials if necessary.

All employees, contractors and sub-contractors must be asbestos awareness trained.

Any work that disturbs asbestos containing materials must have a risk assessment and plan of work

Any asbestos containing material not covered by the exceptions stated in Reg. 3 Para 2 of the CAR 2012 can only be worked upon by licensed contractors and will be notifiable to the HSE.

9.2 Initial assessment

Any operative who discovers a material of unknown provenance must assume it is asbestos and react accordingly. This will include any material within the property, not necessarily related to a specified work area.

Issues of health and safety are *not* put on hold until laboratory analysis confirms or denies the presence of asbestos.

If a material assessment indicates that minor disturbance could release airborne

21 Construction Design Management Regulations, ACoPs L127, page 21

22 As described in 'Asbestos: the survey guide', HSG264.

23 As described in 'Asbestos: the survey guide', HSG264.

asbestos fibre then make safe procedures should be put in place immediately. Contractors have a legal duty of care to report back to the contract administrator any perceived hazard that may potentially affect other operatives or tenants.

Contractors need not refer back to Norwich City Council to put temporary make safe procedures in place.

9.3 General work practice

It is a CDM requirement that work must be carried out in a safe manner (whether CDM notifiable or not). To this end it is always necessary to conduct an assessment of works prior to commencement.

With regard to general responsive operations or programmed work an assessment must be made as to whether asbestos will be disturbed and if this disturbance will be likely to release airborne fibre in concentrations greater than $0.6\text{f}/\text{cm}^3$ measured over 10 minutes.

Unless there is evidence to the contrary a material is always presumed to contain asbestos.

Procedures and policies must be put in place that enables correct assessments of a material to be made, including risk assessments of the potential hazard the material might cause.

‘Bulk’ sampling of a material to send to a laboratory is to confirm that a material contains asbestos; until the results come back it is presumed the material contains asbestos.

Only competent persons should take a ‘bulk’ sample, to ensure the sample is taken safely and correctly.

9.4 Sampling and surveying

Norwich City Council will not allow companies to undertake asbestos surveys on their housing unless they hold a UKAS accreditation to ISO 17020²⁴.

Only competent trained personnel should take bulk samples, with a minimum P402 BIOH qualification.

Contractors will be aware of the difference between taking individual bulk samples (not to be confused with air sampling or monitoring) for lab analysis and conducting an asbestos survey.

Bulk sampling will only give the information as to whether a material contains asbestos

²⁴ As recommended in HSG264

or not, and what type of asbestos it contains. It will not report on what the product is, its likelihood to release fibres, its condition, its position or the amount of ACM.

A survey will produce a report containing all the above information and will generally be a more cost effective option if more than 4 samples are needed to be taken from 1 site.

9.5 Material assessment

To make a correct assessment of a material's ability to release asbestos fibres it is necessary to take into consideration certain characteristics of the material, other than just whether it contains asbestos or not. This assessment should include product type, condition, surface treatment, extent, location and likelihood of disturbance.

An assessment should always be made prior to commencing work, including assessment prior to taking a 'bulk' sample for laboratory analysis.

Only UKAS accredited laboratories (ISO 17025) will be used for analysing bulk samples.

It is not always necessary to take a sample to make an assessment on a material.

Contractors will be aware that anybody taking a sample to be sent for bulk analysis must be competent to take the sample safely. If they are competent to take the sample they must also, by default, be competent to make an assessment.

If the assessment flags up that there is a potential risk of airborne fibre release if the material is disturbed during normal activities then the correct 'make safe' actions must be implemented immediately.

Norwich City Council utilise a 'Bulk Sampling Sheet' to help in material assessments. Contractors will be expected to use it or a similar method of recording material assessments.²⁵

9.6 Testing/sampling

Bulk samples will only be taken by competent persons with correct PPE, RPE. On taking the sample an assessment will be made as to the material condition and any risk posed. The sampled material will always be left in a safe condition (this could mean immediate encapsulation, prior to results being known).

If there is no information in the Norwich City Council database or asbestos register then EITHER:

Bulk samples must taken prior to commencement of work, and be analysed by a UKAS

accredited laboratory. Results to be transmitted to all interested parties and added to Norwich City Council's asbestos register.

OR

Work will proceed with the assumption that the material does contain asbestos and a method statement and plan of work are produced prior to commencement of work.

The 2nd option will only be utilised once a risk assessment has been made that work with the suspect asbestos containing material will only create an exposure to asbestos fibre that is sporadic and of low intensity and of short duration.

9.7 Safe systems of work

It is a legal requirement that employees receive information, instruction and training suitable and sufficient to carry out their duties. This could be asbestos awareness training or training for non-licensable work.

It is reiterated that work that might disturb asbestos must be subject to a correct risk assessment. Some contractors and insurance companies conduct assessments based solely on asbestos type (e.g. work with chrysotile is allowable, work with amosite or crocidolite is not), Norwich City Council does not feel this is suitable or sufficient.

9.8 The magic bullet

Contractors should be aware that access to an asbestos register or possession of an asbestos report – even a refurbishment survey report is not a magic bullet. It will not on its own protect anybody from exposure to asbestos. Risk assessments and safe systems of work should be in place and an appropriate level of asbestos awareness required. Asbestos surveyors are not infallible, an area might be missed or not accessed and ACM not reported.

Absence Of Evidence Is Not Evidence Of Absence.

An example:

A company has been awarded a contract to upgrade central heating systems in domestic properties, including the removal of gas fires and back boilers. Being a responsible organisation they engage the services of a UKAS accredited asbestos survey company.

The house is occupied and all services live.

The one place the asbestos surveyor is not going to access is behind the gas fire in an occupied property with live services.

The one place a gas fitter is guaranteed to access during a heating upgrade is behind the gas fire.

It can be guaranteed that ACM of some description will be behind the gas fire if it was fitted between the 1930s and 1980s.

The gas company should have in place already a safe system of work and control systems and assume they will expose asbestos when moving the gas fire.

A risk assessment before commencement of work may lead them to engage the services of a licensed asbestos remover.

9.9 Asbestos containing materials (ACM's)

Any damaged ACM, or suspected ACM, should always be made safe. This does not necessarily mean removal. Repair and encapsulation are valid methods of asbestos management.

Any changes to the condition of an ACM must be reported to Norwich City Council, including removal, encapsulation and repair work.

Method statements, risk assessments, notification documents, clearance certification etc. must be made available to Norwich City Council

9.10 Textured coatings (artex type coatings)

Contractors will make themselves aware of procedures and safe systems of work for drilling through textured coating, inserting and removing screwed fixtures from textured coating, and removing small areas of textured coating, that do not require licensing or notification.²⁶

From a management rationale it is quite acceptable to skim over textured coating or cover in plasterboard. The presence of asbestos containing textured coating will be noted on the asbestos register, flagged up for monitoring should it be disturbed.

9.11 Vinyl floor tiles

Contractors will make themselves aware of procedures and safe systems of work for the removal of loose and broken floor tiles.

²⁶ Non-licensed task A26, A27, A28, Asbestos essentials, HSG210

9.12 Asbestos insulating board (AIB)

Contractors will be aware that any AIB within a dwelling should be sealed²⁷, enclosed²⁸ or removed. It is not acceptable to have raw unpainted board within a dwelling or internal communal area.

Outside of programmed work, it will be expected that a contractor will remove AIB found in a vulnerable position, even in good sealed condition, e.g. the discovery of an AIB backed boiler cupboard door during void refurbishment works ought to be removed prior to re-let.

Work with AIB should normally be carried out by a licensed contractor.

Contractors will be aware that where AIB was used as a fire break or similar, then the replacement material must be of suitable fire retardant qualities.

It is re-iterated that exemption from notification and licensing does not exempt persons from the Control of Asbestos Regulations and its requirements.

10. INFORMATION FOR TENANTS

10.0 Background

Norwich City Council has a legal²⁹ and moral duty to keep tenants free from harm as far as is reasonably practicable. This includes exposure to asbestos.

Asbestos is a metamorphic rock which was mined across the world and was valued for its heat insulation and fire protection characteristics and its resistance to acid and alkali, making it virtually indestructible. As a fibrous material it was also a good bonding agent. These properties meant it was a perfect building material and asbestos was used in over 3000 products.

Asbestos was used in industry, engineering and building for most of the 20th century, peak usage being in the 1960s and 70s.

The three types of asbestos used commercially were Chrysotile (White), Amosite (Brown), and Crocidolite (Blue).

Unfortunately asbestos was also found to cause respiratory illnesses such as lung cancer, asbestosis and mesothelioma, some of which take up to 30 years to develop from initial exposure. This led to a complete ban in the use of asbestos in 1999.

²⁷ Non-licensed task A7, Asbestos essentials, HSG210

²⁸ Non-licensed task A8, Asbestos essentials, HSG210

²⁹ Housing Act 2004

The threat from asbestos is in inhaling airborne fibres. Left undisturbed and in good condition most asbestos containing materials will not constitute a danger. An asbestos containing material will not necessarily be removed just because it contains asbestos. An assessment will be made as to the likelihood of the material to release fibres to the atmosphere under normal domestic disturbance.

All maintenance and renewal work carried out in a property, whether responsive or programmed, is subject to an assessment as to whether or not it will disturb asbestos prior to work commencing.

Norwich City Council currently has a programme of asbestos management surveys underway to locate asbestos containing materials and record their condition.

Commonly found asbestos containing materials in the home are:³⁰

- **Vinyl floor tiles.** Fibre release is unlikely to be a hazard under normal services and conditions. Broken edges are still unlikely to release fibres but should be reported so loose tiles and debris can be collected and uneven surfaces made good. Not all vinyl floor tiles contain asbestos.
- **Decorative textured coatings** ('Artex' type coating). Generally fibres are well contained in the matrix but may be released when old coating is sanded down or scraped off. Not all textured coatings contain asbestos
- **Asbestos cement sheet.** It is not considered to be a problem if sited outside the home, as commonly used in corrugated profile on garage/shed roofs, or in flat profile for soffits. Likely to release increasing levels of fibres if abraded, hand sawn or worked on with power tools. Exposed surfaces and acid conditions will remove cement matrix and concentrate unbound fibres on surface and sheet laps. Cleaning asbestos-containing roofs may also release fibres.
- **Asbestos insulating board (AIB).** AIB can be readily broken, giving significant fibre release. Also significant surface release is possible by abrasion, but surface is usually painted or plastered. Sawing and drilling will also give significant releases. Whilst painted board can remain in place, broken or raw unpainted board should be reported so it can be encapsulated/removed.

It is also possible that you might find asbestos in the following locations:

- Heating appliances such as boilers or storage heaters
- Ceiling and wall board,

³⁰ Information taken from HSE guidance HSG264

- Bath panels
- Window sills
- Old plaited electric cables
- Fire blankets,
- Bakelite fittings
- Garage and shed walls and roof panels
- Roofing felt
- Gutters and downpipes
- Lino
- Mastics, paints and sealants
- Hair dryers
- Ovens
- Fridges
- Ironing boards
- Wall plugging compound
- Cold water tanks in the loft

This is by no means an exhaustive list, but it does highlight the many ways in which asbestos has been used.

Anything that you think might contain asbestos should be checked for damage. If you find damaged or broken material that may contain asbestos then leave it alone, keep away from the area and call the customer contact team for advice (0344 980 33 33).

11. EMERGENCY PROCEDURES

11.0 Purpose

An emergency procedure has been compiled to deal with unplanned asbestos related incidents, however caused, that arise out of activities that could, or have given rise to the release of asbestos fibres in council owned or managed properties.

The actions taken in the first few hours after an incident will dictate how well the situation is managed.

Nothing written in the procedure should override the experience and skills of operatives in fulfilling their duties following an incident. The response of contractors and their operatives must be governed primarily by the need to ensure the safety of themselves, their colleagues and members of the public.

The aim of an emergency procedure is to:

- Mitigate the effects of the event and prevent further exposure
- Restore the situation to normal, and
- Inform any person who may be affected.

Control must be established at the critical early stages following an incident. Building and Premises managers and Contract Administrators must be provided with action lists in the event of the unplanned release of asbestos in the workplace.

Any incident must be managed to ensure the health safety and welfare of employees and the public.

The purpose of the emergency procedure is to minimise the extent of any potential contamination and prevent any further potential exposures to asbestos fibres. A check list of actions is detailed at the end of this procedure and should be followed in the event of a suspected release of asbestos.

Following a decision by contractors to initiate the procedure, NPS Norwich Ltd. should be advised.

- Office hours contact Norwich City Council on 0344 980 3333
- Out of office hours contact NCAS on 01603 496300

11.1 Initial assessment

Persons making the initial assessment should only do so if it is safe and under no circumstances should they put their own personal safety, or that of others, at risk.

The person making the assessment must be competent to assess the hazard. Some products and materials release asbestos more readily than others.

To aid the assessment process, pro-forma check lists have been designed (Appendices B-D).

11.2 Specialist services

A range of specialist companies and suppliers may be required to assist the Council restore its services. A list of such companies/suppliers is maintained by the main partnering contractor.

11.3 Immediate action list

Stop all work in the area.

Without causing alarm, evacuate the immediate area, advising evacuees that material(s) potentially containing asbestos has been damaged in the local vicinity, and that the area is being evacuated as a precaution (Remember, a single exposure is unlikely to contribute significantly to a lifetime risk.)

Remove all persons out of the affected area to a safe location away from the suspect material. Persons directly linked to the incident may need decontamination first (see Appendix D)

Do not remove any equipment, belongings or materials from the potentially contaminated area.

Isolate the area affected; close or seal or lock off the area where practicable.

Prepare and prominently display a warning sign(s) with the following wording 'NO UNAUTHORISED ACCESS – KEEP OUT'.

List all persons affected by the potential exposure by completing Appendix B.

Contact a member of NPS Norwich Ltd.(NPS), who will attend and take control of the incident and give advice to those directly affected by the incident.

Wait on site in the safe area to hand the incident over to a member of NPS and hand them the completed attendance list (Appendix B)

Where the incident is as a result of asbestos remediation works the contractor's own emergency procedure detailed in their own working method statement will be invoked.

Upon notification of an incident of potential asbestos contamination a member of the NPS will attend the site to take charge of the incident, make a risk assessment, investigate the cause and determine corrective action and remediation needed.

The NPS incident officer has responsibility to record the details of the incident and action taken by ensuring that the pro-forma check list is completed and returned to the NPS, with copies to the Senior Health & Safety Officer and appropriate Building Manager.

11.4 Making safe

The incident officer will ensure that the area is left in a safe condition.

In most incidents licensed contractors will be called upon to enviro-vac area, seal exposed surfaces and remove debris. This will be followed up by reassurance air monitoring.

Further assessments will be made as to what further remedial action is necessary, whether the incident is RIDDOR reportable (the final decision resting with the Senior Health and Safety Officer), if it needs 14 day notification to continue remedial work etc.

11.5 Incidents reported by members of the public or tenants

If somebody phones in (or calls in person) to report a suspected breakage or damage to asbestos containing materials or those suspected to contain it, the recipient (member of council or contract staff, call centre operative) should log the following details:

- Date and time.
- Name and contact no. of person reporting incident.
- Address and location of incident.
- Description of incident and time it occurred.
- Are other hazards involved that might need the emergency rescue services?
- Has the area of the incident been isolated (e.g. the closing of a door)?
- Are others involved?

It is important to reassure the caller that, although potentially serious, a single exposure is unlikely to contribute significantly to a lifetime risk.

Instruct the caller not to go back into the vicinity of the incident and to keep others away if possible until somebody from the contractor's emergency response team arrives.

On arrival on site (possibly somebody's home) the incident officer will assess the situation in a similar manner to that of a work related possible exposure.

The immediate area must be made safe and/or isolated.

An assessment must be made as to whether it is safe or practical for the resident to remain in situ pending remedial work, or whether they should be decanted.

A further assessment should be made as to the spread of possible contamination following the incident.

No belongings can be removed from the contaminated area unless cleaned by a licensed asbestos removal contractor. It is extremely difficult to clean soft furnishings and textiles and electrical goods.

12. COMPLAINTS

Any complaints about this policy or its implementation will be addressed through the council's corporate complaints system. Complaints may be made on a standard form, available from the council's reception areas, or online at www.norwich.gov.uk.

Complaints made in person, by letter or by email will be directed into the corporate scheme.

13. MONITORING AND REVIEW

The policy will be monitored in accordance with the council's performance framework. It will be reviewed on an annual basis, and whenever there is a fundamental change of legislative or regulatory provisions. Minor amendments to the policy will be subject to the approval of the Deputy chief executive (operations).

Integrated impact assessment



NORWICH
City Council

Report author to complete

Committee:	Cabinet
Committee date:	
Head of service:	Chris Rayner
Report subject:	Asbestos Management Policy
Date assessed:	01/06/2014
Description:	<p>The policy is designed to:</p> <ul style="list-style-type: none">a) Set out how the Council manages the risks from asbestos containing materials (ACMs) within the council's property portfolio.b) Ensure that the Council meets all its statutory and regulatory obligations in respect of asbestos management.c) Highlight the responsibilities of employees, leaseholders and tenants in managing asbestos.d) Provide a methodology for the implementation of the asbestos management plan.e) Set out procedures for planned major refurbishment or demolition.f) Provide emergency procedures for the uncontrolled release of asbestos.g) Name overseers/controllers of the asbestos management plan.

	h) Provide a review procedure and timetable for the asbestos management plan.
--	---

	Impact			
Economic (please add an 'x' as appropriate)	Neutral	Positive	Negative	Comments
Finance (value for money)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Other departments and services e.g. office facilities, customer contact	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
ICT services	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Economic development	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Financial inclusion	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Social (please add an 'x' as appropriate)	Neutral	Positive	Negative	Comments
Safeguarding children and adults	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<u>S17 crime and disorder act 1998</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Human Rights Act 1998	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Health and well being	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The policy ensures we are managing the risks that can be associated with asbestos in accordance with all legal requirements, making our homes and buildings safe places to work and live.

	Impact			
Equality and diversity (please add an 'x' as appropriate)	Neutral	Positive	Negative	Comments
Relations between groups (cohesion)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Eliminating discrimination & harassment	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Advancing equality of opportunity	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Environmental (please add an 'x' as appropriate)	Neutral	Positive	Negative	Comments
Transportation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Natural and built environment	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Waste minimisation & resource use	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Pollution	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Sustainable procurement	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Energy and climate change	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(Please add an 'x' as appropriate)	Neutral	Positive	Negative	Comments

	Impact			
Risk management	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The asbestos management plan effectively ensures that we are managing any risks that may be associated with asbestos related materials, and ensures that all relevant stakeholders are aware of the risks and the safe managements of asbestos.

Recommendations from impact assessment	
Positive	
The policy ensures that our properties are safe, healthy places for our customers to live and work, and that all asbestos related issues can be identified and managed accordingly.	
Negative	
N/A	
Neutral	
N/A	
Issues	
N/A	

POLICY	ASBESTOS MANAGEMENT APPENDIX A NOTIFIABLE NON-LICENCED WORK	
DATE ISSUED:	June 2014	REVIEW DATE: June 2014
ISSUED BY:	NPS Norwich (property services)	

CONTENTS
<ol style="list-style-type: none"> 1. Notifiable non-licenced work 2. Is my work NNLW? 3. Notification 4. Medical surveillance 5. Record keeping 6. Decision flow chart 7. Illustration of asbestos work categories
1. NPS NORWICH
<p>The following is advise from the HSE on determining whether work is notifiable or non-notifiable when working with asbestos containing materials.</p> <p>Notifiable non-licensed work All non-licensed work needs to be carried out with the appropriate controls in place. But for notifiable non-licensed work (NNLW), employers also have additional requirements to:</p> <ul style="list-style-type: none"> • notify work with asbestos to the relevant enforcing authority; • ensure medical examinations are carried out; and • maintain registers of work (health records).
2. IS MY WORK NNLW?
<p>2.0 Is it NNLW?</p> <p>Whether a type of asbestos work is either licensable, NNLW or non-licensed work has to be determined in each case and will depend on the type of work you are going to carry out, the type of material you are going to work on and its condition. The identification of the type of asbestos-containing material (ACM) to be worked on and an assessment of its condition are important parts of your risk assessment, which needs to be completed before you start work.</p> <p>Firstly decide if the work is exempt from licensing or not.</p> <p>If the work is exempt from the need for a licence, you then need to determine if it is notifiable non-licensed work or non-licensed work. The key factors to consider are:</p> <p>The type of work you are planning to do:</p>

- Maintenance, e.g. drilling holes to attach fittings or pass cables through, painting, cleaning etc. Maintenance includes some removal where it is incidental to the main task, e.g. removing an asbestos ceiling tile to allow inspection; or
- Removal, e.g. as part of a refurbishment or redesign project; or
- Encapsulation, e.g. work to enclose or seal asbestos materials in good condition; or
- Air monitoring and control, and the collection and analysis of samples.

The asbestos type:

- Is it friable? - the more friable a material is, the more likely it will release asbestos fibres when worked on and the greater the risk of exposure. Work which disturbs more friable materials e.g. asbestos insulation will tend to be NNLW and work which disturbs the least friable materials e.g. asbestos cement can normally be treated as non-licensed work; and
- How firmly is the asbestos bonded in a matrix? (For removal work only) – Asbestos containing materials (ACMs) where the asbestos is coated, covered or contained within another material, such as cement, paint or plastic are considered to be firmly bonded in a matrix, ACMs of this type in good condition can usually be treated as non-licensed work but where they are significantly damaged, and so more likely to release fibres, they will need to be treated as NNLW.

The material's condition:

- Has the material been damaged or is it in poor condition? – removal of ACMs in poor condition e.g. due to flood or fire damage, will normally need to be treated as NNLW; and
- Will the materials' matrix be destroyed when worked on? – e.g. deteriorating textured decorative coatings e.g. 'Artex' with gel or steam to remove it, will normally need to be treated as NNLW.

It is the responsibility of the person in charge of the job to assess the ACM to be worked on and decide if the work is NNLW or non-licensed work. This will be a matter of judgement in each case, dependent on consideration of the above factors.

A decision flow chart is available in Asbestos Essentials sheet AO to help you decide how work with asbestos should be categorised.

To help you, examples of NNLW include, (assuming in all cases exposure is sporadic and of low intensity and will not exceed the control limit):

- minor, short duration, maintenance work involving asbestos insulation, e.g. repairing minor damage to a small section of pipe insulation where the exterior coating has been broken or damaged;
- minor removal work involving AIB, when short duration and as part of a refurbishment project, e.g. removing AIB panels fixed with screws following water damage;
- entry into the roof space above an AIB tiled ceiling, when no decontamination or cleaning has taken place;
- removal work involving textured decorative coatings where the method of removal requires deterioration of the material, e.g. where the material is treated by steam, hydrating gel etc. and scraped off the underlying surface,

- or where it is very badly flood-damaged;
- removal of asbestos paper and cardboard products if not firmly bonded in a matrix;
- Removal of asbestos cement (AC) which is substantially degraded e.g. badly fire-damaged or de-laminated material, or where substantial breakage is unavoidable to achieve removal.

NNLW will not normally include the following, which will continue to be categorised as non-licensed work (which is not notifiable), (assuming in all cases exposure is sporadic and of low intensity and will not exceed the control limit):

- short, non-continuous maintenance work involving AIB which is in good condition, e.g. drilling holes in AIB to attach a fitting or pass through a cable or pipe, cleaning light fittings attached to AIB, removing a door with AIB fire-proofing, or lifting ceiling tiles for inspection where there is no full-body entry into the roof space;
- short, non-continuous maintenance work on asbestos cement (AC), e.g. work on weathered AC roof tiles;
- removal of AC, which is kept virtually intact;
- short, non-continuous maintenance work on textured decorative coatings, e.g. drilling holes, inserting screws or painting;
- small-scale maintenance work with textured decorative coatings when this can be achieved without deterioration of the material, e.g. by careful cutting around backing sheets to achieve removal intact;
- removal, for example, of gaskets or asbestos rope cords from heating appliances, which can be left in situ for disposal or can be lifted out virtually intact, without substantial breakage;
- short, non-continuous maintenance work on clutch discs, brakes, friction products etc. unless significant damage is required e.g. by power tools;
- removal of floor tiles or bitumen felt, when done with the appropriate controls, e.g. inline with Asbestos Essentials sheets A21 and A23;
- work to enclose or seal asbestos materials that are in good condition (and that do not require a licence);
- air monitoring and control, and the collection and analysis of samples.

The illustration of asbestos work categories chart gives some examples of what work falls into the categories of licensed, NNLW and non-licensed.

3. NOTIFICATION

3.0 Notification

If you determine that the work you are about to do is NNLW, this is how to comply with the additional requirements.

Employers need to notify the relevant enforcing authority of any NNLW with asbestos:

- To notify you need to go to the online notifications form (via either a computer or Smartphone);
- All three possible regulators can be notified via this database - HSE, Local Authorities and the Office of Rail Regulation;
- Notice is required before the work starts - there is no minimum notice period;

- You do not need to wait for permission from the enforcing authority – the database will provide a PDF copy of your notification;
- If you are doing a project with multiple NNLW jobs you can notify once for the whole project;
- If you are a licensed asbestos contractor carrying out NNLW work, you will still need to notify;
- The online form is the only method of notification - you can't notify by phone or post.

4. MEDICAL SURVEILLANCE

By 30 April 2015, all workers carrying out NNLW will need to have had a medical examination. Examinations will then need to be repeated at least every 3 years, as long as the worker continues to do NNLW. After April 2015, workers carrying out NNLW for the first time will have to have an examination before they can start such work:

- Medical examinations must include an examination of the chest and a lung function test;
- They need to be carried out by a licensed medical practitioner, e.g. a GP;
- Those workers already under surveillance via a licensed contractor and in possession of a valid certificate do not need to have the NNLW medical;
- Medical examinations should be carried out in work time at the employers' expense;
- The fee should be agreed with the doctor before the examination is carried out- HSE can accept no responsibility for remuneration matters;
- The doctor must issue a certificate to confirm the examination has taken place and on what date. The employer needs to keep this certificate for 4 years

5. RECORD KEEPING

Employers need to keep a register (health record) of NNLW with asbestos for each employee exposed to asbestos:

This must include:

- the nature and duration of work with asbestos and estimated exposure for each individual worker; and
- dates of the worker's medical examinations;
- Record keeping may be as simple as writing down the names of workers on the job on your copy of the notification or keeping copies of the notification form for each person carrying out NNLW work, as the notification copy will document the nature of the job and type of asbestos from which likely exposure can be estimated.
- More detailed medical records will be kept by the doctor;
- Registers of work (health records) must be kept for 40 years (and offered to HSE or the individual concerned should the business cease trading);
- The need to record exposure does not mean that every non licensed task must have air sampling. There will often be published exposure figures or knowledge within the industry about exposures found at similar lower risk work done in the past. If a task is unusual sampling may be required.

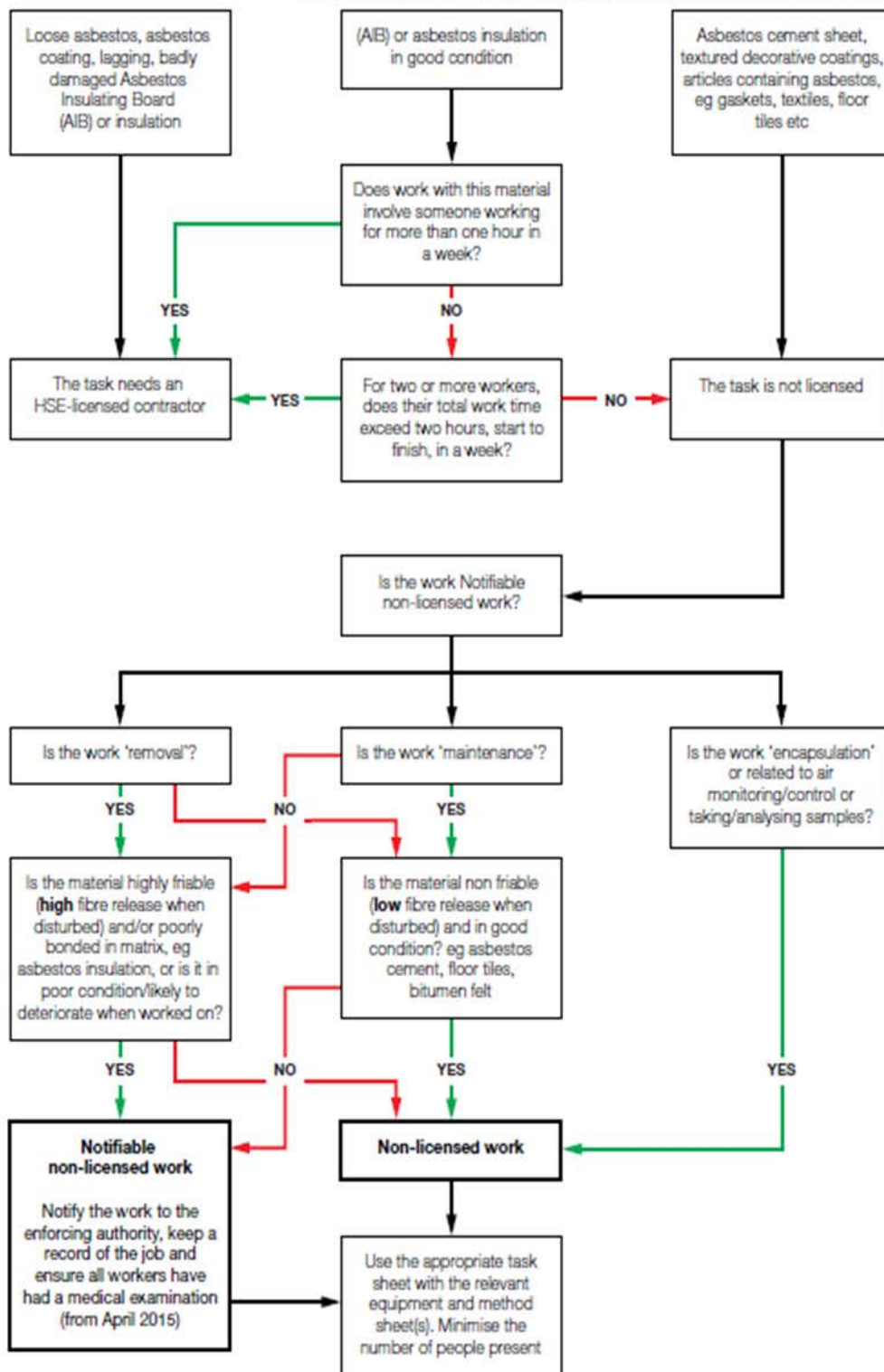
6. DECISION FLOW CHART



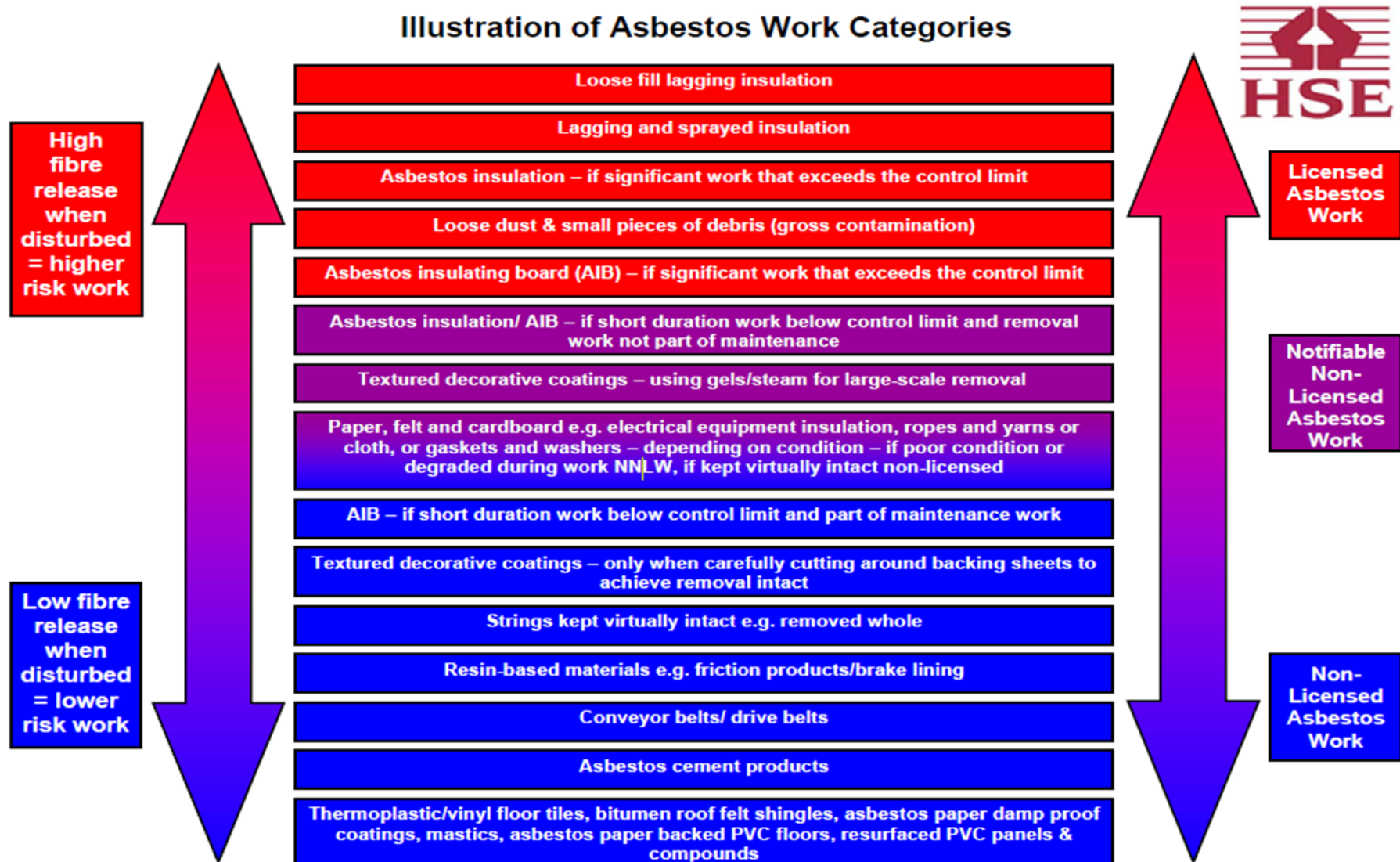
Health and Safety
Executive

Decision flow chart

Use this simple flow chart to help you decide who needs to do the work:



7. ILLUSTRATION OF ASBESTOS WORK CATEGORIES



POLICY		ASBESTOS MANAGEMENT APPENDIX B	
		INCIDENT CHECKLIST	
DATE ISSUED: June 2014		REVIEW DATE: June 2014	
ISSUED BY: NPS Norwich (property services)			
Return completed checklist to NPS Norwich, Townshend House, Norwich NR1 3DT Copy to: Norwich City Council Senior Health & Safety Officer Copy to: Appropriate Building Manager			
Incident number:			
Location/Property Address:			
1.	Location of suspected accidental release		
2.	Circumstances of the suspected release		
3a.	Name of person reporting the suspected release		
3b.	Contact telephone number of the person reporting the suspected release		
4a.	Date and time of suspected release		
4b.	Date and time suspected release reported		
5a.	Were any individuals potentially exposed to asbestos?	Y/N	
5b.	Attendance list completed (Appendix B)	Y/N	
6a.	Has the material been previously identified on the asbestos register	Y/N	
6b.	If NO – is there evidence to suggest the material may contain asbestos?	Y/N	
6c.	Is there any potential for contamination?	Y/N	
7.	List any immediate action taken		
8a.	Service delivery affected?	Y/N	
8b.	Is the area safe/has the asbestos been contained?		
9.	List any remedial action required		
10a.	Has the occurrence or near-miss been notified to Norwich City Council and their health and safety section?	Y/N	
10b.	Is RIDDOR notification required? (if yes, this must be indicated to Norwich City Council)	Y/N	
11a.	Name of person completing the checklist	Y/N	
11b.	Date and time checklist completed		

[illegible]

POLICY		ASBESTOS MANAGEMENT APPENDIX D	
		DAMAGE CHECKLIST	
DATE ISSUED: June 2014		REVIEW DATE: June 2014	
ISSUED BY: NPS Norwich (property services)			
Return completed checklist to NPS Norwich, Townshend House, Norwich NR1 3DT Copy to: Norwich City Council Senior Health & Safety Officer Copy to: Appropriate Building Manager			
Incident number:			
Location/Property Address:			
1.	Location of suspected accidental release		
2.	Number of areas affected		
3.	List any areas isolated		
4.	Is a decant required?		
5.	List any further remedial action required		
6.	Is decontamination of the area necessary?	Y/N	
7.	Have personal belongings been stored and cleared?	Y/N	
8.	List any personal belongings requiring disposal as hazardous waste		
9.	Tenants and residents informed of actions?		
10.	Has the premises manager/housing officer been informed?		
11.	Name of person completing checklist		

POLICY	ASBESTOS MANAGEMENT APPENDIX E HSE GUIDANCE	
DATE ISSUED:	June 2014	REVIEW DATE: June 2014
ISSUED BY:	NPS Norwich (property services)	

CONTENTS
<ol style="list-style-type: none"> 1. Introduction 2. Asbestos building and safety checklist for every job 3. EM1 asbestos essentials 4. Flow chart for asbestos containing materials 5. EM8 personal decontamination
1. INTRODUCTION
<p>The following documentation has been extracted from HSG210. Please refer to HSE document 'Asbestos Essentials, Task Manual' HSG210 for further guidance and information.</p>

2. ASBESTOS BUILDING AND SAFETY CHECKLIST FOR EVERY JOB

ASBESTOS BUILDING AND SAFETY CHECKLIST FOR EVERY JOB

- ✓ Can you avoid disturbing asbestos by doing the job in some other way?
- ✓ Do you need a license for the work?
- ✓ Always follow all legal requirements.
- ✓ Follow the task guidance sheet.
- ✓ Use an asbestos waste container.
- ✓ Take asbestos waste to a licensed disposal site.

Minimise dust:



Keep materials damp – not too wet



Use hand tools – not power tools



Clean up as you go – use a special vacuum cleaner, (class H) not a brush



Double-bag asbestos waste and label the bags properly

- **Caution:**
Don't sweep up dust or debris – use a Class H vacuum cleaner or damp rags.
- Don't take used overalls home.
- Don't re-use disposable PPE.
- Don't smoke.
- Don't eat or drink in the work area.

Wear:

Suitable disposable overalls and boots without laces, or disposable boot covers



If you take a break:

Don't smoke, eat or drink in the work area



When you finish work:

Decontaminate yourself – wipe down your overalls with a damp rag and remove them before removing your mask.

See overleaf for Asbestos building showing typical locations for the most common asbestos materials →



em1 asbestos essentials

Non-licensed tasks

This information will help employers and the self-employed to comply with the Control of Asbestos Regulations 2006.

It is also useful for trade union and employee safety representatives.

Only carry out work if you are properly trained and have the right equipment.

Remember:

- Asbestos fibres can cause lung cancer and lung diseases.
- Check it out before you start work.
- Read the safety checklist on the task sheet.



Don't assume there will always be warning signs. There could be undiscovered asbestos in buildings you work on.



Asbestos lagging on an old tank



Asbestos insulating board (AIB) fire surround



There are three 'colours' of asbestos, but you can't tell just by the colour what you have found; it could be mixed with other ingredients which change the appearance.



Asbestos isn't always obvious. Would you spot an asbestos gasket on an old engine, asbestos cement pipes or an asbestos-containing fuse-board? If you're not sure, the premises owner needs to get it checked out!



These asbestos cement pipes are labelled, so are the tiles, but you might not know until you start to lift them.



There could be sprayed limpet under this asbestos cement (AC) sheeting

What to do if you uncover or damage materials that may contain asbestos

Equipment and method sheet

What this sheet covers

This sheet shows some examples of where asbestos can be found. A chart describes what to do if you find asbestos materials during a job.

It also applies where asbestos materials get damaged by accident.

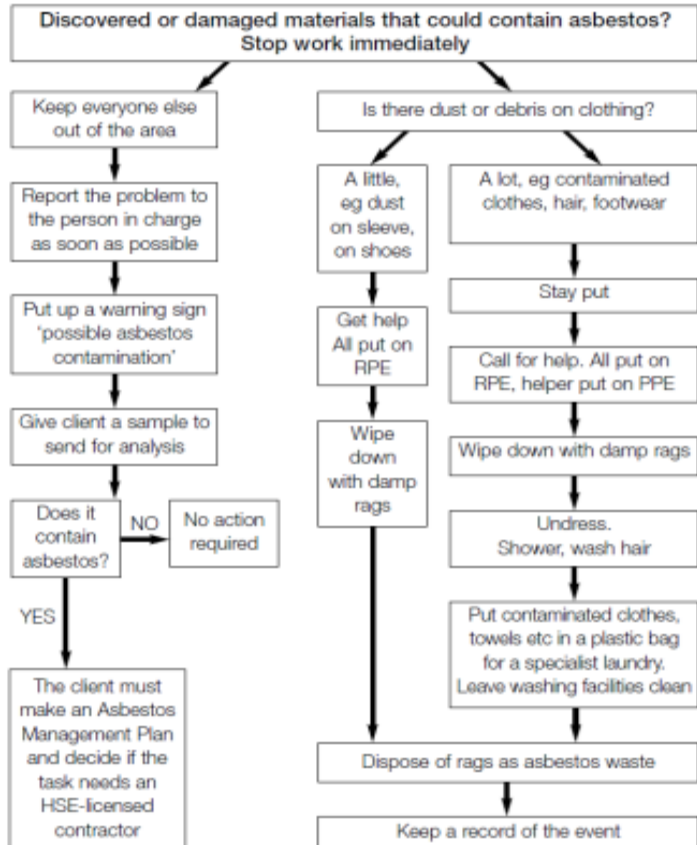
4. FLOW CHART FOR ASBESTOS CONTAINING MATERIALS



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MORE HELP

- Licensed asbestos contractors, and training providers - HSE's Infoline
Tel: 0845 345 0055
Textphone: 0845 408 9577
e-mail: hse.infoline@natbrit.com
and at www.hse.gov.uk/asbestos/licensing/index.htm
- HSE priced and free publications -
HSE Books Tel: 01787 881165
and at www.hsebooks.co.uk
- More asbestos pictures -
www.hse.gov.uk/asbestos/gallery.htm
- These equipment and method sheets and task (a) sheets can be downloaded free from www.hse.gov.uk/asbestos/essentials/index.htm
- See sheet a0 for details of more guidance



Procedures

- Stop this work immediately.
- Follow the chart above or do a risk assessment to decide who must do the work - you may need a licensed contractor.
- Minimise the spread of contamination to other areas.
- Keep exposures as low as you can.
- Clean up the contamination.

This guidance is issued by the Health and Safety Executive. Following the guidance is not compulsory and you are free to take other action. But if you do follow the guidance you will normally be doing enough to comply with the law. Health and safety inspectors seek to secure compliance with the law and may refer to this guidance as illustrating good practice.

This document is available at www.hse.gov.uk/asbestos/essentials/index.htm

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Asbestos essentials

em8 asbestos essentials

Non-licensed tasks

Personal decontamination

Equipment and method sheet

What this sheet covers

This sheet describes how to decontaminate yourself after any work with asbestos materials.

Personal decontamination is easier when you wear the correct personal protective equipment (PPE).

You need to decontaminate yourself properly, otherwise you may take asbestos fibres home on your clothing and expose your family and friends.

Procedures

Removing and decontaminating personal protective equipment (PPE)

- Clean your boots with damp rags - see sheet em7.
- Where available, clean your overalls with the brush attachment on a Class H vacuum cleaner. Vacuum off the brush.



Make sure you restrict access



'Buddy' cleaning using a Class H vacuum cleaner



A task manual on non-licensed asbestos work



With damp rags, use a patting action to avoid disturbing fibres

- Otherwise, use damp rags with a 'patting' action. Rubbing can disturb fibres.
- Where there are two workers, they can help to clean each other.
- Peel off disposable overalls. They should be inside out. Put them in a suitable asbestos waste container.
- Bag up re-usable overalls for a specialist laundry.
- Finally, remove your disposable respirator and place it in the asbestos waste container.
- Tape the container closed.

Personal decontamination

- Can you use site washing facilities? If so, they must be for your use only.
- Keep other people out during personal decontamination, and until you have cleaned the facilities.
- Wash every time you leave the work area.
- Use damp rags to clean the washing facilities at the end of the job.
- Clean the facilities daily if the job lasts more than one day.
- Inspect the facilities visually once the job is finished.
- Clearance air sampling is not normally needed for washing facilities.

POLICY		ASBESTOS MANAGEMENT APPENDIX F BULK SAMPLING MATERIALS	
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ISSUED BY:		NPS Norwich (property services)	

CONTENTS
<ol style="list-style-type: none"> 1. Material assessment 2. Disturbance assessment 3. Assessment chart
1. MATERIAL ASSESSMENT
<p>Columns 6-10 address the information pertinent to the material sampled.</p> <p>Column 6. Product Type. As described in HSG264. It is very important here when the surveyor samples to differentiate between cement sheet (1) and insulating board (2). As there has already been a product description (Column 2) Column 6 should be written up numerically (1, 2 or 3)</p> <p>Column 7. Condition. As described in HSG264. 0 = Good, to 3 = high damage or delamination of material.</p> <p>Column 8. Surface Treatment. As described in HSG264. Please note that insulating board that has been painted or encapsulated but has bare patches through abrasion or flaking should be described as 2 'unsealed AIB', rather than 1 'encapsulated AIB'.</p> <p>Column 9. Asbestos Type. As described in HSG264. It is acceptable to enter an assumed score in this column. A competent surveyor should have background knowledge to enable him/her to anticipate the analysis result. A default score will be 3 (crocidolite).</p> <p>Column 10. MAS. As described in HSG264. This is the Material Assessment Score, the sum of columns 6-9. The higher this total the higher the likelihood of fibre release should the material be disturbed.</p>
2. DISTURBANCE ASSESSMENT
<p>Columns 11-13 help in the assessment of the likelihood of fibre release.</p> <p>Column 11. Position. As described in HSG227¹. This takes into the consideration the position of the material; From outdoors (0) to confined spaces (3)</p> <p>Column 12. Accessibility. As described in HSG227.</p>

¹ 'A Comprehensive Guide to Managing Asbestos in Premises'; 2002

From 'Unlikely to be disturbed' (0) to 'Routinely disturbed' (3)

Column 13. Amount. As described in HSG227.

From 'Small amount such as string, gaskets' (0) to 'More than 50m² or 50m linear' (3)

From the above it can be seen that prior to the analysis of a sample an assessment can be made as to whether immediate 'make safe' action needs to be taken, regardless of the eventual laboratory result.

Summary

An assessment should always be made prior to commencing work, including taking a 'bulk' sample for laboratory analysis.

Anybody taking a sample to be sent for bulk analysis must be competent to take the sample safely. If they are competent to take the sample they must also, by default, be competent to make the assessment.

The Bulk Sampling Sheet can be used as an aid to making a correct material assessment.

Each sample taken must be referenced in such a manner so as to link the material assessment to the bulk analysis result.

If the assessment flags up that there is a potential risk of airborne fibre release if the material is disturbed during normal activities then the correct 'make safe' actions must be implemented immediately.

3. ASSESSMENT CHART*

Address:		Norwich City Council								Date:			
Sample No.	Description	Floor	Area	Location	Product Type	Condition	Surface Treatment	Asbestos Type	MAS	Position	Accessibility	Extent/ Amount	
Example nb01	Textured coating	Ground	Living Room	Ceiling	1	0	0	1, assumed	2	2	0	2	

Sketch

*See over for legend

Product Type	Condition	Surface Treatment	Asbestos Type	MAS	Position	Accessibility	Extent/ Amount
	0, Good: no visible damage	0, Composite materials containing asbestos: reinforced plastics, resins, vinyl tiles.		<5 Very low potential for fibre release	0, Outdoors	0, Usually inaccessible , or unlikely to be disturbed	0, Small amounts, string, gaskets
1, Asbestos reinforced composites (plastics, resins, mastics, roofing felts, vinyl floor tiles, semi-rigid paints or decorative finishes, asbestos cement etc.)	1, Low damage: a few scratches or surface marks; broken edges on boards; tiles etc.	1, Enclosed sprays and lagging, AIB (with exposed face painted or encapsulated), asbestos cement sheets etc.	1 , Chrysotile	5-6 Low potential to release fibres if disturbed	1, Large rooms or well ventilated areas	1, Occasionally likely to be disturbed	1, <10m2 or <10m pipe run
2, Asbestos Insulating Board, mill boards, other low density insulation boards, asbestos textiles, gaskets, ropes & woven textiles, asbestos paper & felt.	2, Medium damage: significant breakage of materials or several small areas where material has been damaged revealing loose asbestos fibre.	2, Unsealed AIB, or encapsulated lagging and spray	2 , Amosite	7-9 Medium potential to release fibres if disturbed	2, Rooms up to 100m2	2, Easily disturbed	2, >10m2 to <50m2 or >10m to <50m pipe run
3, Thermal Insulation (e.g. pipe & boiler lagging), Sprayed asbestos, Loose asbestos, asbestos mattresses & packing.	3, High damage or delamination of materials, sprays and thermal insulation. Visible asbestos debris.	3, Unsealed lagging and sprays	3 , Crocidolite	>9 High potential to release fibres if disturbed.	3, Confined spaces	3, Routinely disturbed	3, >50m2 or >50m pipe run

POLICY	ASBESTOS MANAGEMENT APPENDIX G EXAMPLES OF POOR ASBESTOS ASSESSMENT AND MANAGEMENT	
DATE ISSUED:	June 2014	REVIEW DATE: June 2014
ISSUED BY:	NPS Norwich (property services)	

CONTENTS
<ol style="list-style-type: none"> 1. Example 1 2. Example 2 3. Does it matter?
1. EXAMPLE 1
<p>Property 1</p> <p>A tenant called in a query after a friend said that a board closing off a hearth was asbestos board.</p> <p>An operative took a bulk sample for analysis. No assessment was made.</p> <p>Following a phone call, a project surveyor from property services was invited by the tenant to inspect the board. Modern townhouse of 1970s construction. Tenant had young child. Board was unpainted and raw. If it was asbestos containing it would readily release fibre. Following visit, project surveyor put on new work request to immediately encapsulate board pending sample test results.</p> <p>The operative who came to encapsulate the material <i>merely placed tape around the edge of the board</i>, leaving the expanse of board still exposed and able to release fibres. This did not make the board safe prior to removal.</p> <p>Had an assessment been made at the time the bulk sample was taken it would have been apparent that this board could easily release fibre and was in a vulnerable position. The board should have been properly encapsulated with a proprietary pva solution or physically covered with plastic sheet and duct tape, pending sample results.</p>
2. EXAMPLE 2
<p>Property 2 A tenant accidentally broke a piece of cupboard door lining (door was sticking). Requested asbestos test.</p> <p>An operative arrived and took the broken piece of board from the tenant as a sample (approx. 20cm²). The door lining was inspected but no assessment was made of the raw broken edge of the board and its ability to release asbestos fibre.</p> <p>As the asbestos test was by tenant request it fell outside of the contractors normal procedures and no further work was actioned even after the results came back as</p>

positive, amosite.

Prompted by the tenant, a removal order was put on for the door lining. An operative arrived and decided that it was imprudent to remove the board from the door. However, another piece was broken off and the operative cleaned up the debris using a dustpan and brush, *borrowed from, and returned to, the tenant*. At this point the raw broken edge was taped up (the surface of the board had been painted originally), *more than 7 months after the damage had been reported*.

Again, a proper assessment at the time the operative came to take a sample would have meant that immediate make safe procedures would have sealed raw edges and cleaned up debris, using a HEPA filtered vacuum cleaner.

Not having the correct equipment and borrowing a brush from the tenant further compounded errors and probably increased risk of spreading asbestos fibres.

3. DOES IT MATTER?

The control limit for airborne asbestos fibre is $<0.1\text{f/ml}$, i.e. if there are more than 100 fibres per litre of air (measured over a 4 hour period) it becomes a respirator area where RPE must be worn.

A 'countable' fibre¹ is described as being longer than 5 microns (μ) and thinner than 3μ diameter and an aspect ratio greater than 3:1. This would give a smallest countable fibre a nominal volume of $34\mu^3$.

Imagine a cube of pure asbestos with dimensions no bigger than 1cm^3 (a small sugar cube). It could possibly contain more than 29,400,000 fibres

If this cube was asbestos insulation board, AIB (typical asbestos content up to 40%), it could contain 10,800,000 fibres.

Imagine a kitchen, $3\text{m} \times 2.5\text{m} \times 2.4\text{m}$, 18m^3 total volume.

A 1cm cube of AIB crumbled in this area could produce an airborne concentration of $650,000\text{f/m}^3$, or 650f/l , or 0.65f/ml , over 6 times the control limit.

The above illustration is purely hypothetical, not taking into account fibre dispersal patterns or the friability of the products but hopefully it demonstrates why assessments should be taken with even small amounts of material that might contain asbestos. Asbestos insulating board is highly friable.

¹ HSG248, The analyst's guide for sampling, analysis & clearance procedure.

POLICY	ASBESTOS MANAGEMENT APPENDIX H EQUIPMENT LIST	
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EQUIPMENT FOR SURVEYORS	
Access	<ul style="list-style-type: none"> • Telescopic ladder
PPE	<ul style="list-style-type: none"> • P2 dust mask • Disposable coveralls (Tyvek etc.) • Disposable booties (polythene type, not heavy duty)
Tools	<ul style="list-style-type: none"> • Large flat screwdriver • Small flat screwdriver • Large Phillips screwdriver • Small Phillips screwdriver. • Flat edged pliers • Magnifying glass • Inspection mirror • Stanley knife • Tape measure • Torch • Camera • Tool box
Miscellaneous	<ul style="list-style-type: none"> • Sample bags • Labels • Duct tape • Typex • Tube of filler paste • Wet wipes • Plastic refuse sacks, heavy duty (for drop sheets) • ½ or 1 litre garden spray • Pva adhesive

POLICY	ASBESTOS MANAGEMENT APPENDIX I KEY CONTACTS	
DATE ISSUED:	June 2014	REVIEW DATE: June 2014
ISSUED BY:	NPS Norwich (property services)	

CONTACT LIST		
TITLE	NAME	TELEPHONE
Chief Executive Officer	Laura McGillivray	01603 211001
Duty Holder	Jerry Massey	01603 212225
Head of Strategic Property Services	Gary Atkins	07867 550667
Head of Operational Property Services	Carol Marney	07818 098537
Senior Risk Surveyor	Neil Belson	07799 863237
Senior Health & Safety Officer	Michael Stephenson	01603 212283
NPS Norwich	Townshend House	01603 227999
Customer Contact Team	City Hall	0344 980 3333
Health & Safety Executive	HSE Hotline	0845 345 0055

POLICY	ASBESTOS MANAGEMENT APPENDIX J KEY REGULATORY DOCUMENTS	
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CONTENTS
<ol style="list-style-type: none"> 1. Asbestos regulations 2. Asbestos approved codes of practice and guidance 3. Medical series 4. Health and safety approved codes of practice and guidance 5. Waste regulations
1. ASBESTOS REGULATIONS
<ul style="list-style-type: none"> • SI No. 2739 Control of Asbestos Regulations 2012 • SI No. 3607 The Asbestos (Prohibitions) Regulations 1992 • SI No. 1889 The Asbestos (Prohibitions) (Amendment) Regulations 2003 • SI No. 1649 The Asbestos (Licensing) Regulations 1983 • SI No. 3223 The Asbestos (Licensing) (Amendment) Regulations 1998
2. ASBESTOS – APPROVED CODES OF PRACTICE AND GUIDANCE
<ul style="list-style-type: none"> • HSG264 Asbestos: The survey guide (2010) • L143 Work with materials containing asbestos. (2006) • HSG 247 Asbestos: The Licensed Contractors guide (2006) • HSG 248 Asbestos: The analysts guide for sampling, analysis and clearance procedures (2005) • HSG 53 The selection, use and maintenance of respiratory protective equipment (2005) • L127 ACoP – The Management of Asbestos in non-domestic premises (2002) • HSG 227 A comprehensive guide to managing asbestos in premises (2002) • HSG 213 Introduction to Asbestos Essentials (2001) • HSG 210 Asbestos Essentials – Task Manual (2001)
3. MEDICAL SERIES
<ul style="list-style-type: none"> • MS 13 Asbestos: Medical Guidance Note (2005)
4. HEALTH AND SAFETY – APPROVED CODES OF PRACTICE AND GUIDANCE
<ul style="list-style-type: none"> • L73 A guide to Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (1999)

5. WASTE REGULATIONS

- SI No. 894 The Hazardous Waste (England and Wales) Regulations 2005
- SI No. 1056 The Waste Management Licensing Regulations 1994 as amended 2003
- SI No. 2092 Carriage of Dangerous Goods (Carriage, Packaging and Labelling) & Use of Transportable Pressure Receptacles Regulations 1996

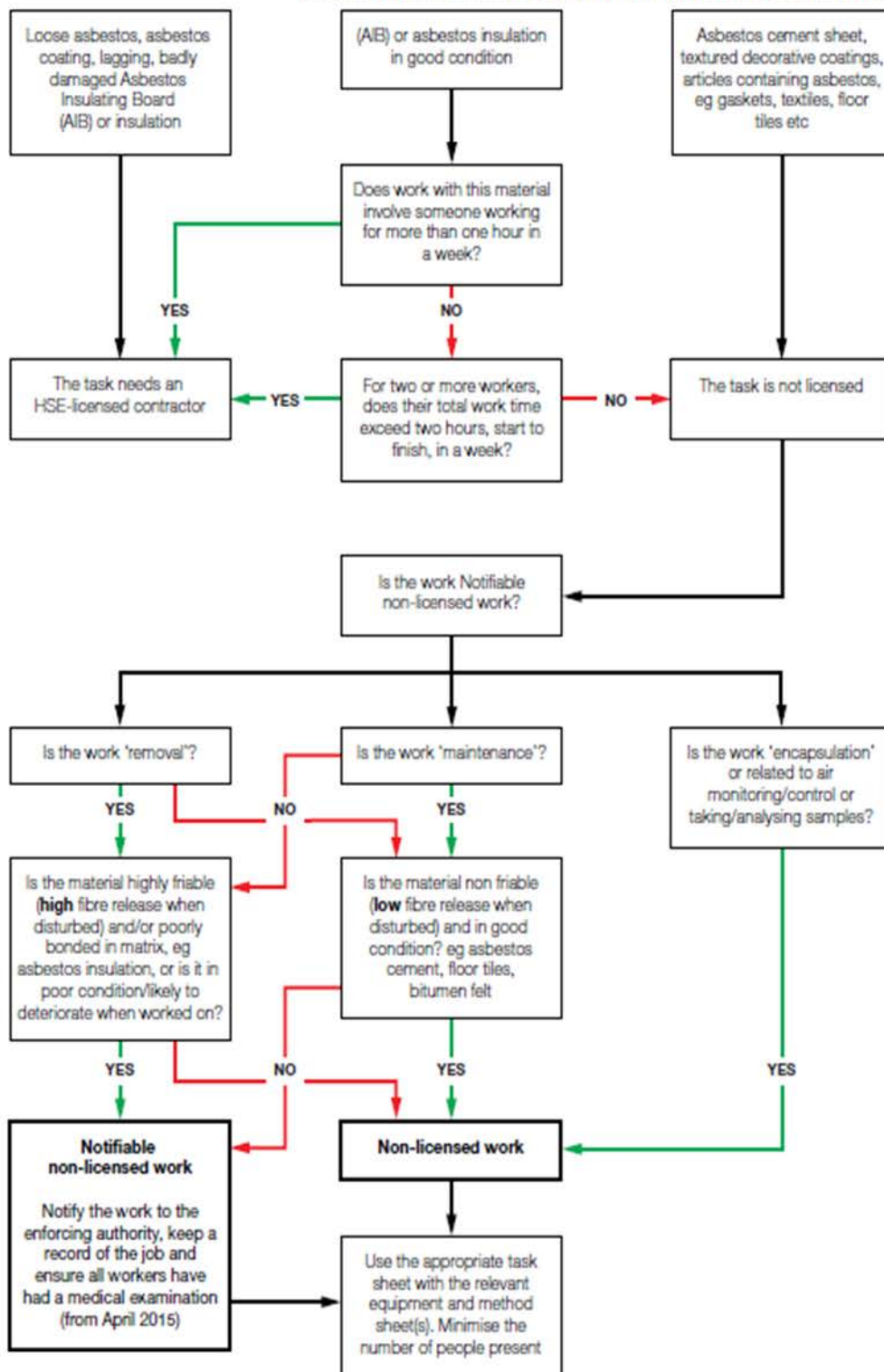
6. DECISION FLOW CHART



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Decision flow chart

Use this simple flow chart to help you decide who needs to do the work:



7. ILLUSTRATION OF ASBESTOS WORK CATEGORIES

