

# **Managing Asbestos in Schools**

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## **Managing Asbestos in Schools: An Overview**

**Sam Lord and Nick James**

## What we will cover..

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Introduction: Scale of the problem, legal framework and HSE guidance



What is the Duty to Manage?



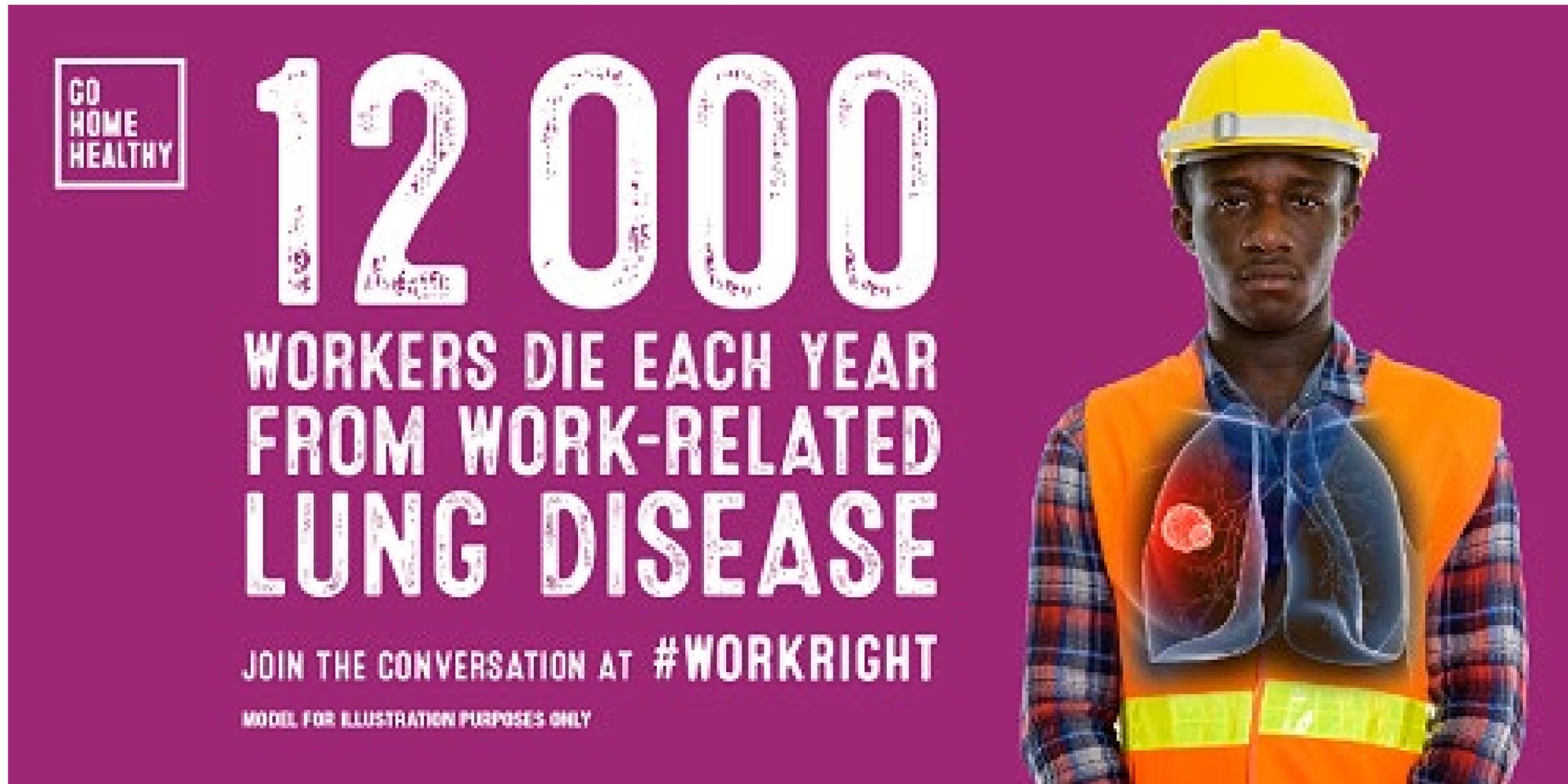
Duty to Manage in Practice



Inspection campaigns

**There are 12,000 Occupational Lung Disease (OLD) deaths annually**

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**GO HOME HEALTHY**

**12000**

**WORKERS DIE EACH YEAR FROM WORK-RELATED LUNG DISEASE**

**JOIN THE CONVERSATION AT #WORKRIGHT**

MODEL FOR ILLUSTRATION PURPOSES ONLY

# Asbestos related deaths make up a significant percentage of OLD deaths

However the number of mesothelioma deaths are projected to decline through to 2030 (Figure 2)

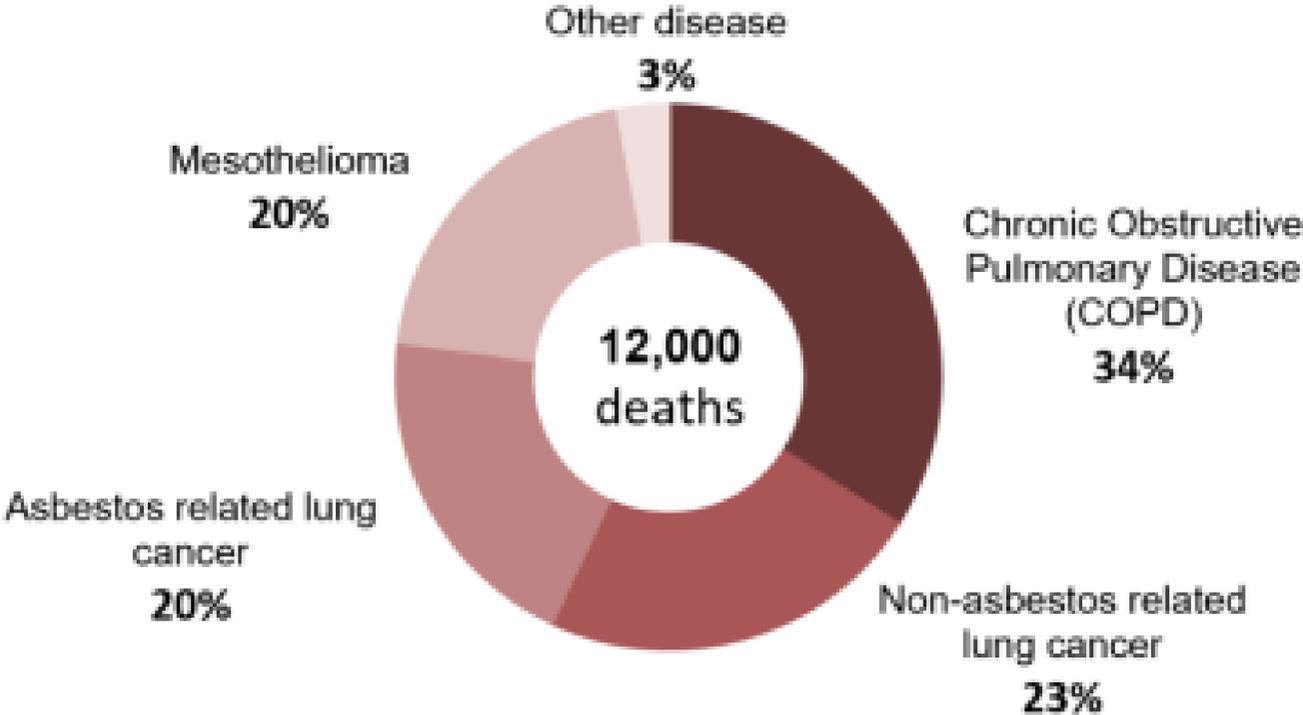


Figure 1: OLD related deaths 2021

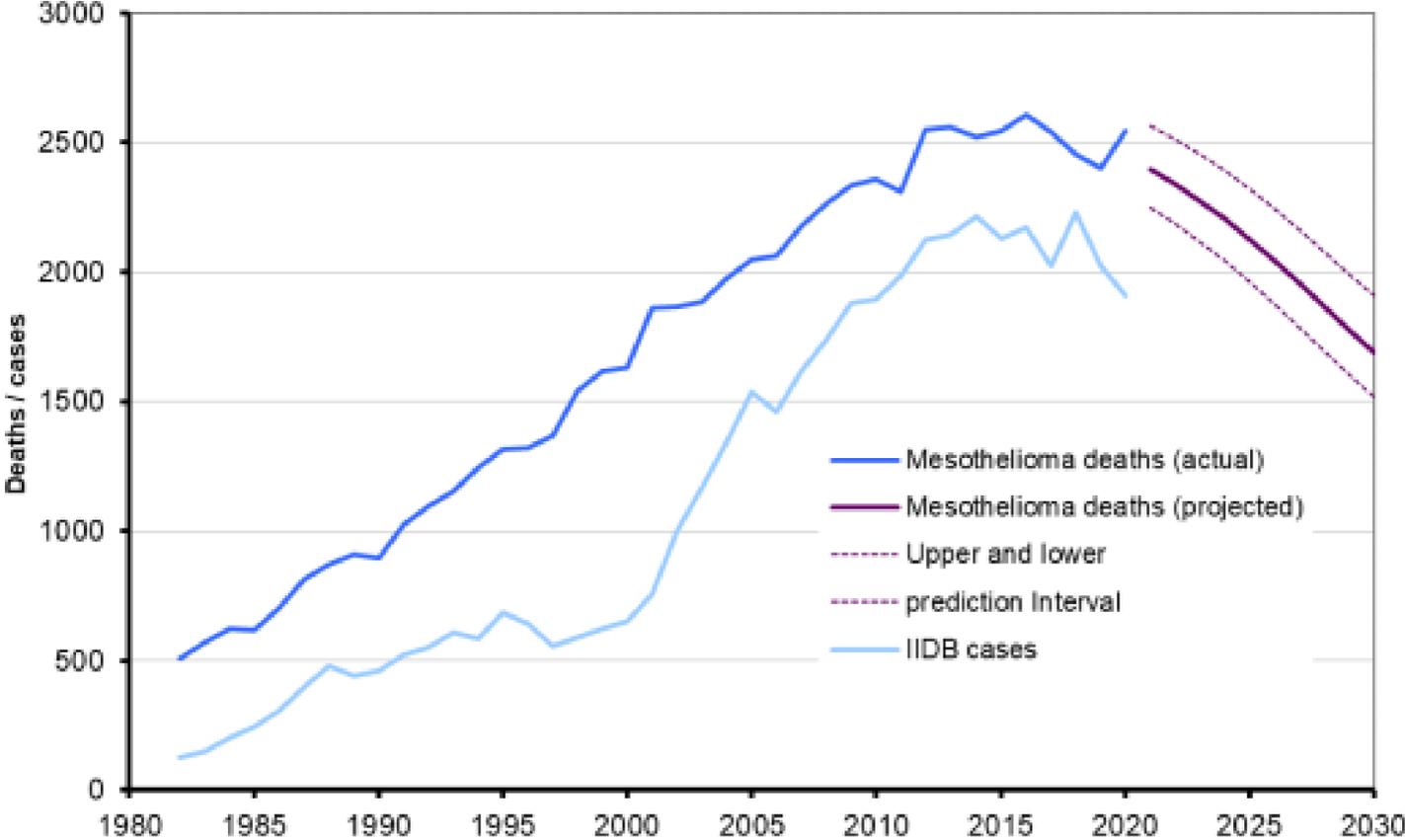


Figure 2: Mesothelioma deaths 2022

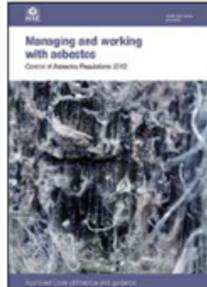
## Why is effective management of asbestos important?

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### ACMs used extensively in construction of schools (1950s - 1999)

- **Manufacture** of asbestos products
- **Installation** of asbestos products **= PAST EXPOSURES**
  
- **Removal of asbestos-containing materials (ACMs) without**  
suitable controls **= PRESENT DAY EXPOSURES**
- **Inadvertent disturbance** of ACMs during construction and  
maintenance activities

# What is the regulatory environment for Asbestos?



**Managing and working with asbestos**  
Control of Asbestos Regulations 2012

Approved Code of Practice and guidance

This publication contains the Control of Asbestos Regulations 2012, the Approved Code of Practice (ACOP) and guidance text. Two ACOPs, L127 (*The management of asbestos in non-domestic premises*) and L143 (*Work with materials containing asbestos*) have been consolidated into this single revised ACOP. The presentation and language has been updated wherever possible. It provides guidance text for employers about work which disturbs, or is likely to disturb, asbestos, asbestos sampling and laboratory analysis. It also provides guidance on the specific duty to manage asbestos on the owners and/or those responsible for maintenance in non-domestic premises.

The Regulations set out your legal duties and the ACOP and guidance give practical advice on how to comply with those requirements. The Regulations give minimum standards for protecting employees from risks associated with exposure to asbestos.

The Regulations came into force on 6 April 2012, updating and replacing the previous 2006 law. They contain new requirements for certain types of non-licensable work with asbestos on notification of work; designating areas where you are working on asbestos; medical surveillance and record keeping.

L143 (Second edition)  
Published 2013

## Control of Asbestos Regulations 2012 ACOP and Guidance



**Health and Safety at Work etc. Act 1974**

1974 CHAPTER 37

An Act to make further provision for securing the health, safety and welfare of persons at work, for protecting others against risks to health or safety in connection with the activities of persons at work, for controlling the keeping and use and preventing the unlawful acquisition, possession and use of dangerous substances, and for controlling certain emissions into the atmosphere; to make further provision with respect to the employment medical advisory service; to amend the law relating to building regulations, and the Building (Scotland) Act 1959; and for connected purposes. [31st July 1974]

**Extent Information**

**E1** For the application of this Act to Northern Ireland see s. 84(1); Pt. III of this Act (except s. 75 and Sch. 7) does not extend to Scotland see s. 84(2).

**Modifications etc. (not altering text)**

**C1** Act applied (15.12.1999) by 1996 c. 18, Pt. VIII, s. 72(4) (as substituted (15.12.1999) by 1999 c. 26, ss. 7, 8, 9, Sch. 4 Pt. I; S.I. 1999/2830, art. 2(2))  
Act extended (11.10.1999) by S.I. 1999/2550, reg. 3

**C2** Act applied by S.I. 1988/778, reg. 11(1)

**C3** Act applied by S.I. 1990/13, reg. 11(5)  
Act applied in part (1.9.1993) by S.I. 1993/1746, reg. 18(1)(a).  
Act extended (1.1.1994) by S.I. 1993/2379, reg. 9(a).  
Act extended (1.12.1993) by S.I. 1993/2714, reg. 9(4)(a).  
Act applied (31.1.1994) by S.I. 1993/3050, art. 21(1)(a) (with art. 3).  
Act applied (with modifications) (29.7.1994) by S.I. 1994/1806, regs. 3(1), 12  
Act applied in part (15.3.1995) by S.I. 1995/263, arts. 3-8, 10  
Act applied (with modifications) (18.7.1995) by S.I. 1995/1629, art. 30(3)(b)(5)

**C4** Act: specified provisions applied (with modifications) (29.11.1992) by S.I. 1992/2415, reg. 4(1)

**C5** Act: specified provisions applied (1.1.1993) by S.I. 1992/2997, reg.6

## Health and Safety at Work Act 1974

# The HSE website

The HSE website contains extensive guidance on Asbestos, with specific guidance for duty-holders in schools and the education sector.

Home News **Guidance** About HSE Books Free updates Contact  
HSE > [Guidance](#) > [Industries](#) > [Public services](#) > [Education](#) > [Topics](#) > Asbestos in schools

- ← Education
- Overview
- Asbestos in schools**
- School trips
- Sensible health and safety management in schools →
- Slips and trips in education
- Special educational needs

## Asbestos in schools

Asbestos was extensively used as a building material in the UK from the 1950s through to the mid-1980s. It was used for a variety of purposes, typically fireproofing and insulation. Any building built before 2000 (houses, factories, offices, schools, hospitals etc) can contain asbestos.

System buildings (for example CLASP, SCOLA, SEAC, MACE, ONWARD) constructed during the period 1945 -1980 were widely used for the construction of school premises. These buildings can have structural columns fire proofed with asbestos containing materials (ACMs).

In 2007 a 'CLASP' working group was set up to advise on the potential asbestos fibre release in CLASP and other similar system built schools. [Guidance on the management of asbestos in system build premises \(PDF\)](#) was first published in 2007 and revised in 2008.

### Duty to manage asbestos

The Control of Asbestos Regulations 2012 includes the 'duty to manage asbestos' in non-domestic premises. The responsibility falls to the duty holder. In many cases, this is the person or organisation that has clear responsibility for the maintenance or repair of non-domestic premises.

Guidance on the duty to manage asbestos can be found in the [Managing and working with asbestos. Control of Asbestos Regulations 2012. Approved Code of Practice and guidance L143](#) HSE Books 2013 ISBN 978 0717 666 188 and on the duty to manage area of the HSE website.

### Inspection initiatives in schools

Home News **Guidance** About HSE Books Free updates Contact  
HSE > [Guidance](#) > [Industries](#) > [Public services](#) > [Education](#) > [Frequently asked questions](#) > Asbestos FAQs

- ← Education
- Overview
- Asbestos FAQs**

## Managing asbestos in schools - Frequently asked questions

- [What is asbestos?](#) ↓
- [Why is asbestos dangerous?](#) ↓
- [Where is asbestos found in schools?](#) ↓
- [Who's at risk from asbestos in schools?](#) ↓
- [Who's responsible for managing asbestos in schools?](#) ↓
- [What is the 'duty to manage' asbestos?](#) ↓
- [What does the dutyholder have to do in practice in a school?](#) ↓
- [What is the role of school staff?](#) ↓
- [What do dutyholders need to know about using contractors?](#) ↓

# What is the 'Duty to Manage'?

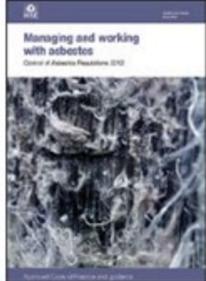


Health and Safety  
Executive

## Managing and working with asbestos

Control of Asbestos Regulations 2012

Approved Code of Practice and guidance



L143 (Second edition)  
Published 2013

This publication contains the Control of Asbestos Regulations 2012, the Approved Code of Practice (ACOP) and guidance text. Two ACOPs, L127 (*The management of asbestos in non-domestic premises*) and L143 (*Work with materials containing asbestos*) have been consolidated into this single revised ACOP. The presentation and language has been updated wherever possible. It provides guidance text for employers about work which disturbs, or is likely to disturb, asbestos, asbestos sampling and laboratory analysis. It also provides guidance on the specific duty to manage asbestos on the owners and/or those responsible for maintenance in non-domestic premises.

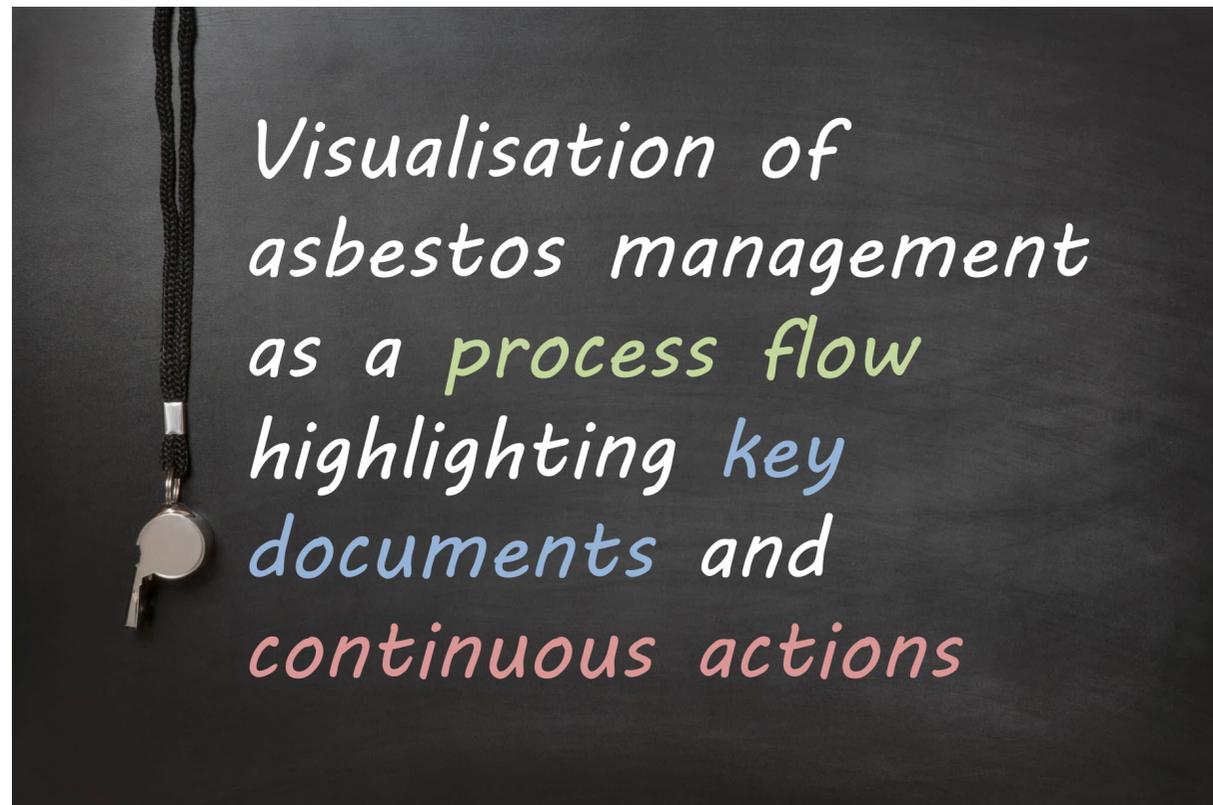
The Regulations set out your legal duties and the ACOP and guidance give practical advice on how to comply with those requirements. The Regulations give minimum standards for protecting employees from risks associated with exposure to asbestos.

The Regulations came into force on 6 April 2012, updating and replacing the previous 2006 law. They contain new requirements for certain types of non-licensable work with asbestos on notification of work; designating areas where you are working on asbestos; medical surveillance and record keeping.

## Management of Asbestos in buildings - 'Duty to Manage' – Regulation 4

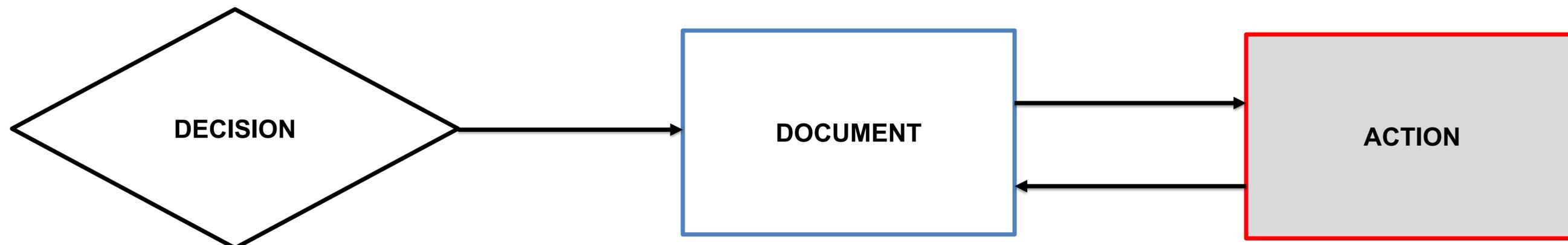
1. Establish if asbestos is present
2. Determine the risks
3. Manage those risks to ensure no-one is exposed to asbestos fibres

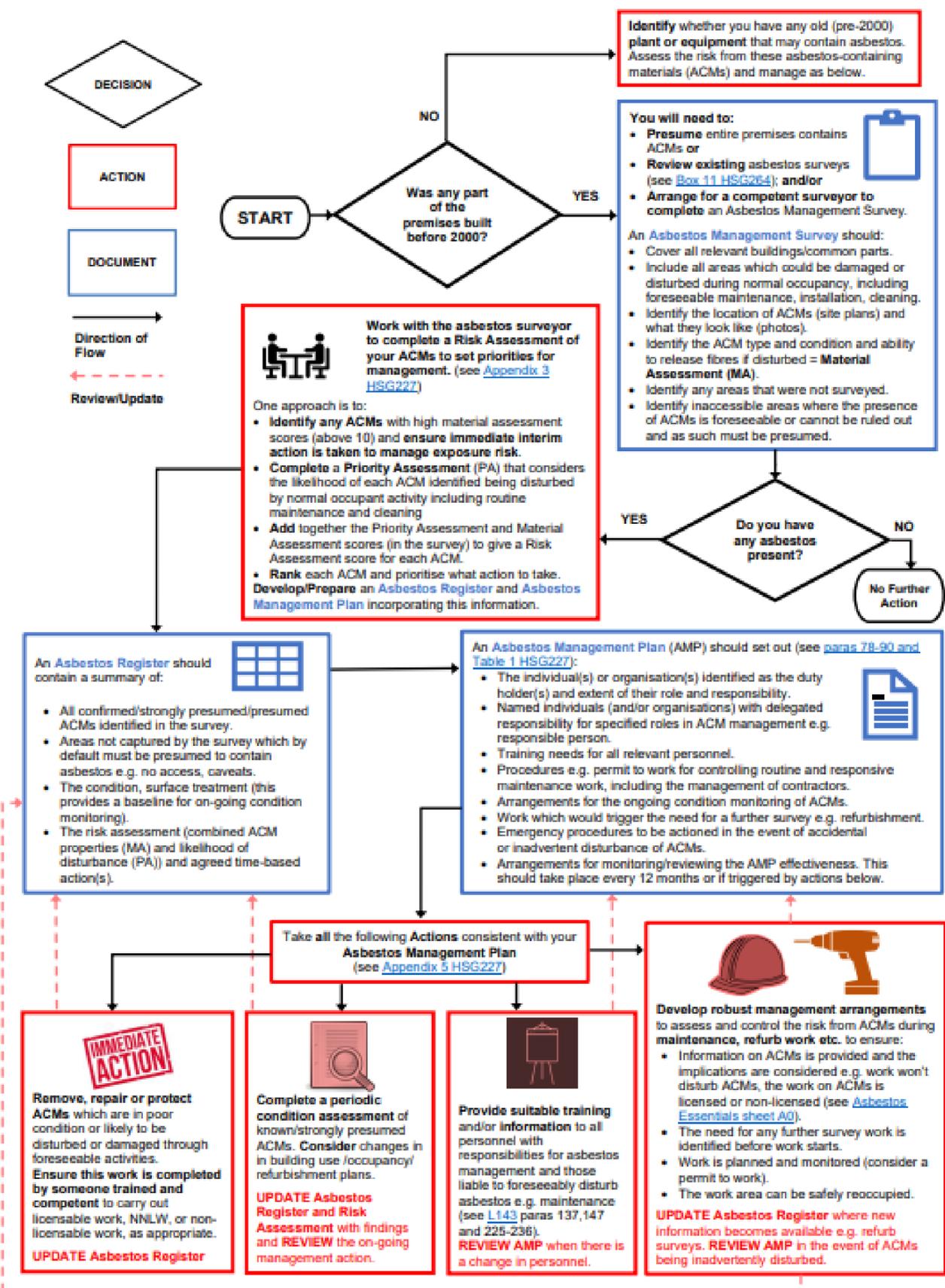
## What does a duty to manage asbestos look like in practice?



The duty to manage asbestos requires DECISIONS on whether there is asbestos present in the building(s) and what **ACTION** needs to be taken to effectively manage the risk based on how likely the ACM will release fibres and how likely it could be disturbed.

These decisions are supported by three specific **DOCUMENTS**.





Asbestos Risk – A One-Stop Guide for Small Construction Businesses and Tradespeople »  
Construction Leadership Council

Enter  
'CLC Asbestos Risk'  
into internet search engine

**ACTION**

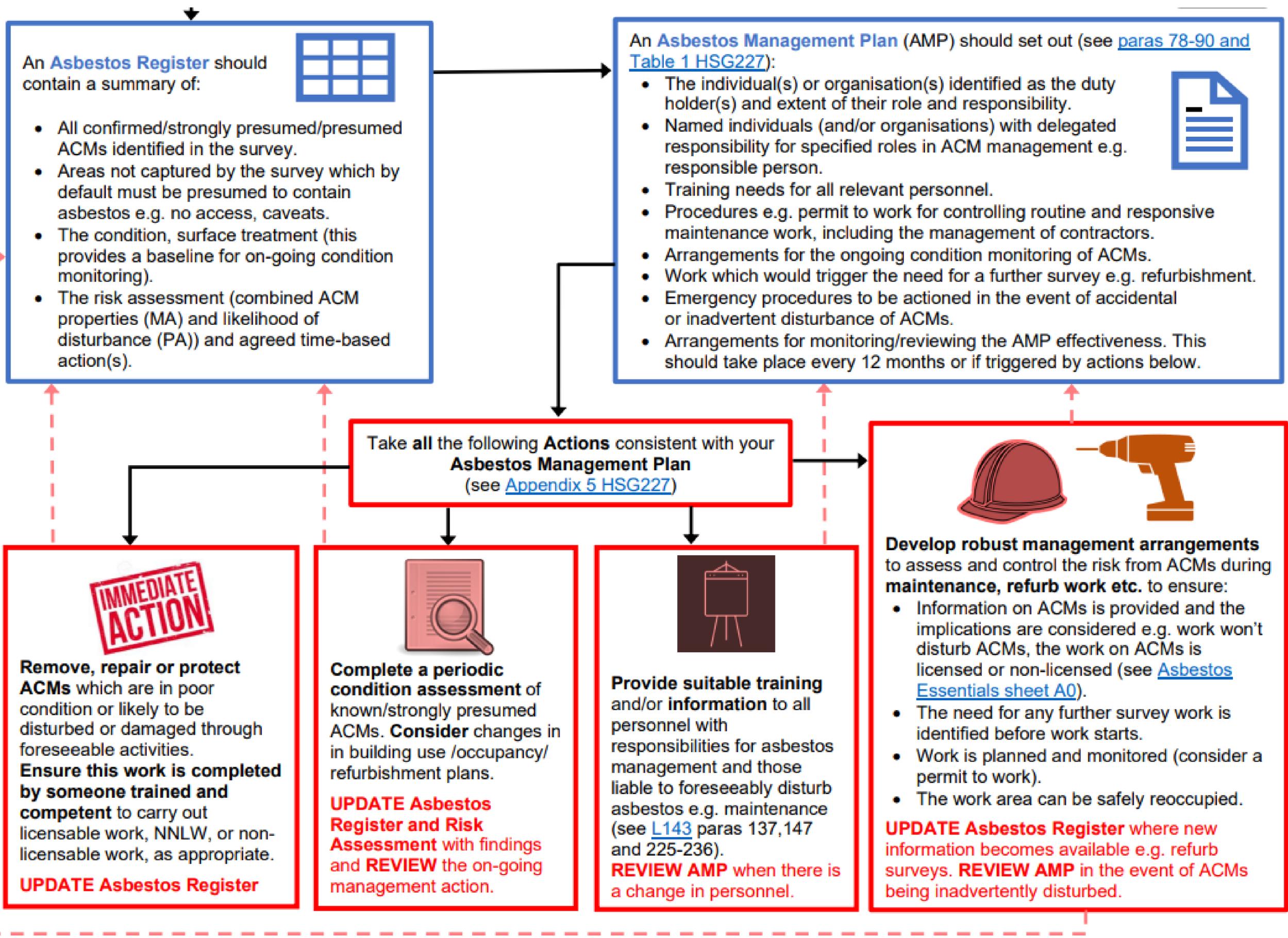
**DOCUMENT**



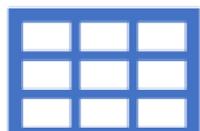
**Direction of Flow**



**Review/Update**



An **Asbestos Register** should contain a summary of:



- All confirmed/strongly presumed/presumed ACMs identified in the survey.
- Areas not captured by the survey which by default must be presumed to contain asbestos e.g. no access, caveats.
- The condition, surface treatment (this provides a baseline for on-going condition monitoring).
- The risk assessment (combined ACM properties (MA) and likelihood of disturbance (PA)) and agreed time-based action(s).

An **Asbestos Management Plan (AMP)** should set out (see [paras 78-90 and Table 1 HSG227](#)):



- The individual(s) or organisation(s) identified as the duty holder(s) and extent of their role and responsibility.
- Named individuals (and/or organisations) with delegated responsibility for specified roles in ACM management e.g. responsible person.
- Training needs for all relevant personnel.
- Procedures e.g. permit to work for controlling routine and responsive maintenance work, including the management of contractors.
- Arrangements for the ongoing condition monitoring of ACMs.
- Work which would trigger the need for a further survey e.g. refurbishment.
- Emergency procedures to be actioned in the event of accidental or inadvertent disturbance of ACMs.
- Arrangements for monitoring/reviewing the AMP effectiveness. This should take place every 12 months or if triggered by actions below.

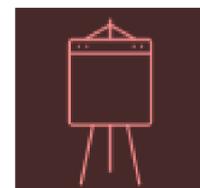
Take **all** the following **Actions** consistent with your **Asbestos Management Plan** (see [Appendix 5 HSG227](#))



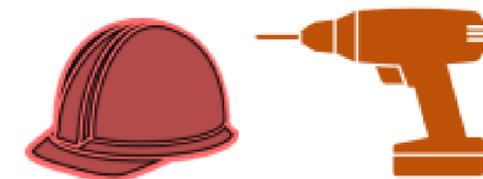
**Remove, repair or protect ACMs** which are in poor condition or likely to be disturbed or damaged through foreseeable activities. **Ensure this work is completed by someone trained and competent** to carry out licensable work, NNLW, or non-licensable work, as appropriate.  
**UPDATE Asbestos Register**



**Complete a periodic condition assessment** of known/strongly presumed ACMs. **Consider** changes in in building use /occupancy/ refurbishment plans.  
**UPDATE Asbestos Register and Risk Assessment** with findings and **REVIEW** the on-going management action.



**Provide suitable training and/or information** to all personnel with responsibilities for asbestos management and those liable to foreseeably disturb asbestos e.g. maintenance (see [L143](#) paras 137,147 and 225-236).  
**REVIEW AMP** when there is a change in personnel.



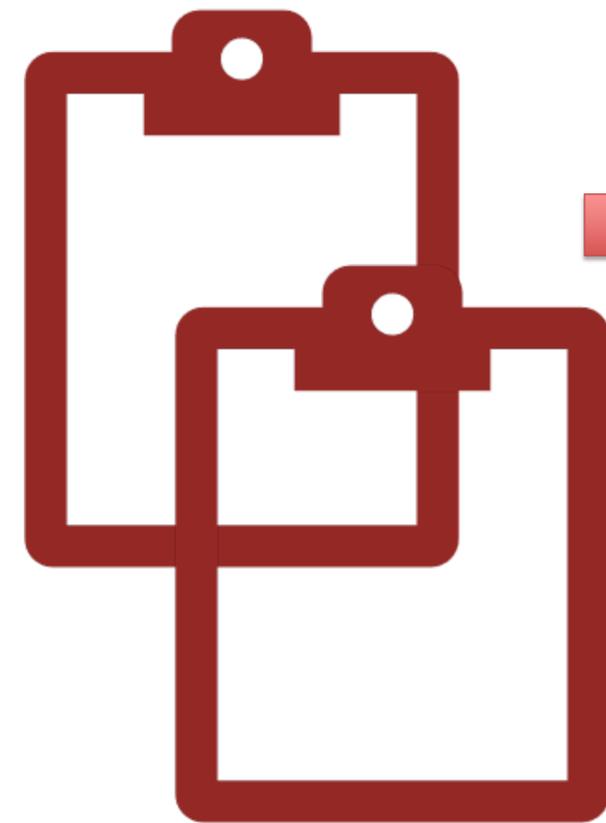
**Develop robust management arrangements** to assess and control the risk from ACMs during **maintenance, refurb work etc.** to ensure:

- Information on ACMs is provided and the implications are considered e.g. work won't disturb ACMs, the work on ACMs is licensed or non-licensed (see [Asbestos Essentials sheet A0](#)).
- The need for any further survey work is identified before work starts.
- Work is planned and monitored (consider a permit to work).
- The work area can be safely reoccupied.

**UPDATE Asbestos Register** where new information becomes available e.g. refurb surveys. **REVIEW AMP** in the event of ACMs being inadvertently disturbed.

*Focus on understanding the function of documents and why they are needed*

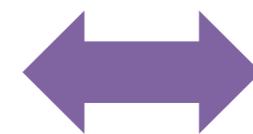
‘The information in the **Survey Report(s)** should be used to form the **Asbestos Register** which is a key component of the **Management Plan**’ (HSG264 Asbestos: The Survey Guide)



**Asbestos Survey  
Report(s)**



**Asbestos Register**  
(always in use and  
under review)



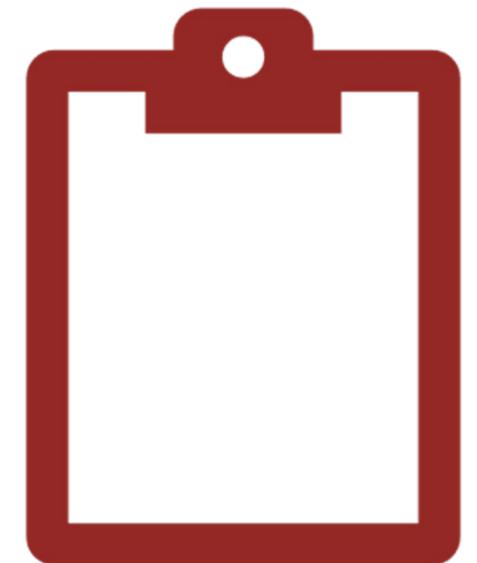
**Asbestos Management Plan**  
(always in use and under  
review)



## What is the Asbestos Management Survey?

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- An inspection of all reasonably accessible areas to identify asbestos:
  - ✓ Surfaces: Walls, ceilings, pipes, boilers, cladding, floor tiles etc.
  - ✓ Lift shafts, inside risers, service ducts, above false ceilings, tunnels etc
  - ✓ Must include a material assessment i.e. asbestos and product type, condition, surface treatment.



**Areas not inspected must be presumed to contain asbestos.**

An **accurate survey is key** to identifying and managing asbestos risk in buildings

**If asbestos location is unknown – ‘exposure incidents waiting to happen’**

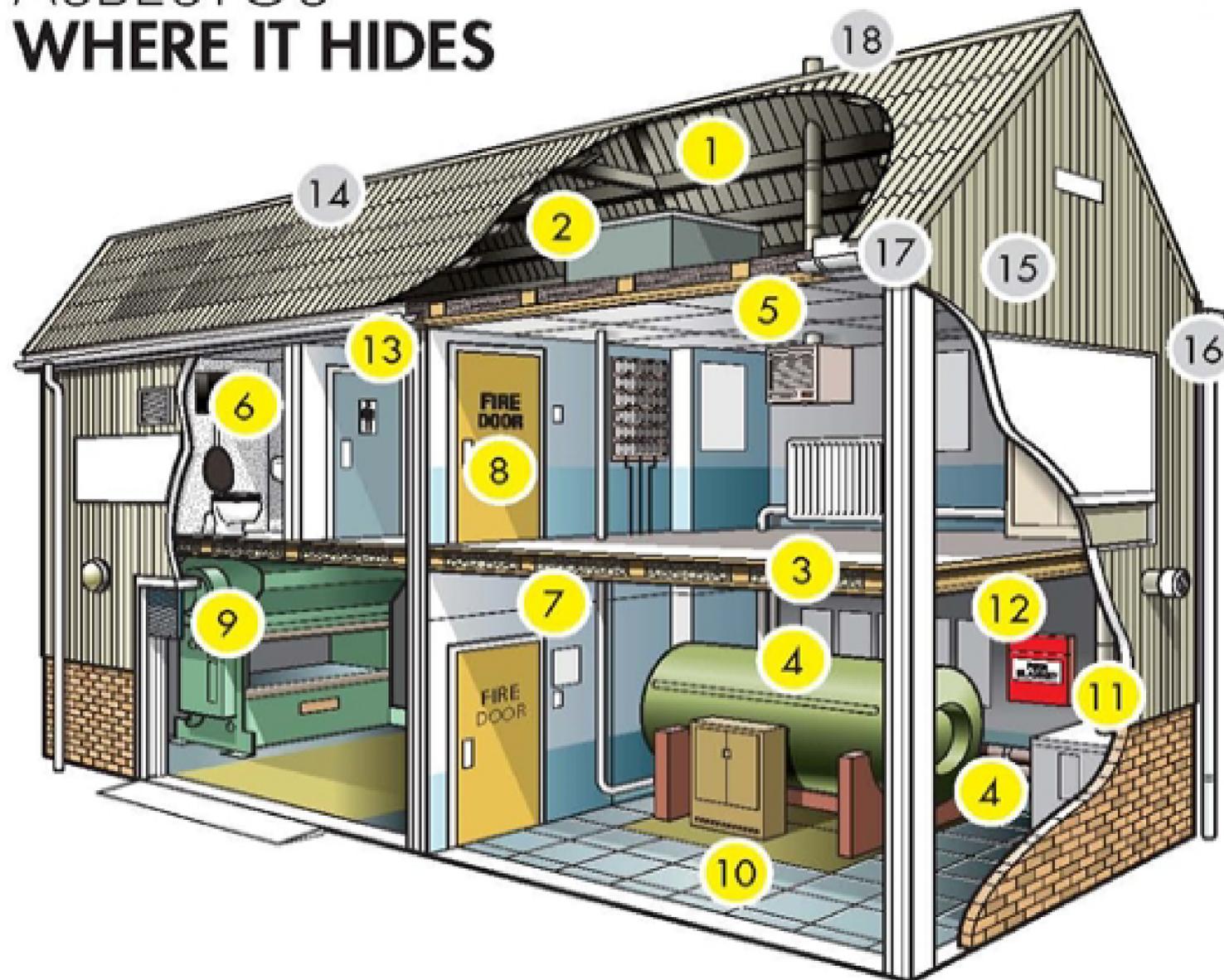
## Examples of reasonably accessible areas that should be included in a Management Survey

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# Identification of Asbestos

## ASBESTOS WHERE IT HIDES



### Inside:

1. Sprayed coatings on ceilings, walls, beams and columns
2. Asbestos cement water tank
3. Loose fill insulation
4. Lagging on boilers and pipes
5. AIB ceiling tiles
6. Toilet seat and cistern
7. AIB partition walls
8. AIB panels in fire doors
9. Asbestos rope seals, gaskets and paper
10. Vinyl floor tiles
11. AIB around boilers
12. Textiles eg fire blankets
13. Textured decorating coatings on walls and ceilings eg artex

### Outside:

14. Asbestos cement roof
15. Asbestos cement panels
16. Asbestos cement gutters and downpipes
17. Soffits – AIB or asbestos cement
18. Asbestos cement flue

## What are 'System' Buildings

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- ❑ The term 'system building' refers to a **method of construction** where the component parts of the building fabric were factory produced and site assembled.
- ❑ Most system built schools were constructed in the **1960's and 1970's** which coincided with the peak period of asbestos imports and manufacture of ACMs.
- ❑ Essential to the building design, especially steel and timber framed structures, is adequate **fire protection** - **ACMs were used** for this purpose.



# AIB within columns

Used to provide fire protection to structural steel columns

Column casing came in 2 parts creating a small gap at join



**Asbestos  
Insulation  
Board**



Health and Safety  
Executive

Asbestos in system buildings  
Control of Asbestos Regulations 2006  
Guidance for duty holders  
Updated 18 September 2008

**Purpose of this guidance**

1. This guidance gives information about potential asbestos fibre release in all system buildings, based on investigations following an incident in a CLASP school building undergoing extensive refurbishment in the summer of 2006. It was found that asbestos fibres were released to air when the casings of the support columns were struck heavily. Background information to this incident is given in paragraphs 24-26. System buildings built from the 1950's to the early 1980's had their structural columns fireproofed with asbestos materials, which were in turn enclosed by metal casings. Asbestos fibres can escape from these casings if:

- There is damaged asbestos present under the casings; and
- The casings are vibrated in some way, e.g., by an adjacent door being slammed; and
- There are gaps or openings in the casings.

When these gaps and openings are sealed – asbestos fibres cannot escape into rooms.

2. System buildings are particularly widespread throughout the public sector, the majority of them are school buildings. See box below for some of the different types of system buildings. There is a likelihood that such buildings contain asbestos materials. The issues arise predominantly in system buildings but you should be aware that steel-clad columns with asbestos insulation may also have been incorporated into traditional buildings of the time.

**Types of system building**

CLASP	SEAC	ORLIT	
SCOLA	HILLS	SPOONER	
MACE	LAINGSPA	N	SIMMS SON AND COOK
ONWARD	VIC	HALLAM	PRATTEN
METHOD	CLAW		BRISTOL
ASC	AUSTIN-HALL		BOULTON&PAUL TIMBER
LESSER BS		STONERE SB	SWIFTPLAN LTD
TERRAPIN LTD		TRANSLINK LTD	WARNICK & SONS
YOUNGMAN SB			

This list is not exhaustive

## Refurbishment Survey – when is it necessary?

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Required for all work which disturbs fabric of building in areas where the Management Survey has not been intrusive



## Duty Holders must appoint a competent surveyor

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- ✓ HSE **strongly recommends** use of UKAS accredited surveying organisation
- ✓ Duty Holders **must** check competency:
  - ✓ Check qualifications (P402 - Surveying and Sampling Strategies for Asbestos in Buildings or RSPH Certificate in Asbestos Surveying), accreditation status
  - ✓ Past experience of surveying building type and survey type, references
- ✓ For refurbishment or demolition surveys knowledge of building construction techniques and design is particularly relevant to understand where (and why) ACMs may have been used in a structure.



# HSG264 Asbestos: The Survey Guide

## How to use this guidance

Green summary boxes: This publication has specific guidance for clients/dutyholders in green boxes:

- Box 1:** The purpose of an asbestos survey.
- Box 3:** What the client/dutyholder should do to check the competency of the surveyor.
- Box 4:** Areas to be inspected as part of a management survey.
- Box 6:** Information the client/dutyholder should expect from the surveyor.
- Box 9:** Information required for a management survey.
- Box 10:** Information required for a refurbishment or demolition survey.
- Box 11:** What the client/dutyholder should do to check the accuracy of the survey report.

Blue summary boxes: This publication has specific guidance for surveyors in blue boxes

- Box 2:** Survey key points.
- Box 5:** Information the surveyor needs from the client.
- Box 7:** Information to be collected by the surveyor.
- Box 8:** Example of a systematic survey inspection.



### Box 3: What the client/dutyholder should do to check the competency of the surveyor

The dutyholder should be satisfied that the surveyor is competent to carry out the work required.

This means that the dutyholder should make reasonable enquiries as to whether the organisation or individual is technically competent to carry out the survey adequately and safely, and can allocate adequate resources to it. The competency enquiry should be carried out as a two-stage process:

- **Stage 1:** An assessment of the individual's or company's survey expertise and also, their knowledge of health and safety, to determine whether these are sufficient to enable them to carry out the survey competently, safely and without risk to health.
- **Stage 2:** An assessment of the individual's or company's experience and track record to establish if it is capable of doing the work and that it recognises its limitations.

**Stage 1:** Establish the accreditation or certification status of the surveyor and any relevant asbestos survey qualifications (see paragraphs 23–28). Obtain a written declaration which states that the surveyor can operate with independence, impartiality and integrity and that personnel carrying out the work are adequately trained for all aspects of the work taking place. In addition, obtain copies of the current insurance certificates for employer's liability, public liability and professional indemnity cover and check them to see that they cover the proposed work.

**Stage 2:** Obtain information on the surveyor's past experience on the type of survey planned and their capability to do the work. References or evidence of recent similar work should be requested.

If a company or surveyor cannot demonstrate competence through current accreditation or personnel certification, the dutyholder will need to conduct a more detailed assessment of their competence to do the work. This will include requesting: details of their qualifications, copies of their written procedures (including quality control policies) and references to other evidence of recent similar work.

## What is the Asbestos Register?

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- A 'live' register that details:
  - ✓ the location of identified ACMs (information from all asbestos surveys)
  - ✓ their condition at last inspection (typically inspected every 12 months)
  - ✓ assessment of the exposure risk (accounting for condition at last inspection and likelihood of disturbance)
  - ✓ actions required to manage this risk

All of the above are subject to change as the physical building and activity that takes place inside is always in a state of flux



**Asbestos Register for [Redacted] Primary School**

**Asbestos Samples – Page 1 of 2**

Reports:

Additional Reports:

Inspection Number	Report Date / Sample No	Location / Rm No.	Product type	Quantity	Accessibility Y/N	Condition	Surface Treatment	Asbestos Type	Sampled / Presumed / strongly presumed	MA	PA	PS
A1S	01-03-2004 4/3/B/1/PK30	Stairwell 5	VFT	10 m <sup>2</sup>	Y	Good	other	Chrysotile	Sampled	1	10	11
A1SP	01-03-2004 4/3/B/1/PK27	1 <sup>st</sup> flr Resource Rm7	VFT	145 m <sup>2</sup>	Y	Good	other	Chrysotile	Sampled	1	10	11
A2S  (Painted Pink)	01-03-2004 4/3/B/1/PK32	Classroom Rm8	AIB cladding to steel beams	Significant	Y	Good	Surface Sealed	Amosite	Sampled	6	10	16
	01-03-2004 4/3/B/1/PK33	Grd flr stairwell 23	Fascia panel to suspended ceiling	10 m <sup>2</sup>	Y	Good	Surface sealed	Amosite	Sampled	6	10	16
	01-03-2004 4/3/B/1/PK34	Grd flr corridor 22	Cladding panels to structural beams	Significant	Y	Good	Surface Sealed	Amosite	Sampled	6	10	16
	01-03-2004 4/3/B/1/PK35	Grd flr classroom Rm21	Cladding panels to structural beams	Significant	Y	Good	Surface Sealed	Amosite	Sampled	6	10	16
	01-03-2004 4/3/B/1/PK38	Grd flr stairwell 2	Fascia panel to suspended ceiling	10 m <sup>2</sup>	Y	Good	Surface Sealed	Amosite	Sampled	6	10	16
	01-03-2004 4/3/B/1/PK39	Grd flr corridor 2 / classroom Rm4	Cladding to beam above door in ceiling void	Significant	Y	Good	Surface Sealed	Amosite	Sampled	6	10	16
	01-03-2004 4/3/B/1/PK40	Grd flr store Rm7	Cladding to beam	Significant	Y	Good	Surface Sealed	Amosite	Sampled	6	10	16
	A3S	01-03-2004 4/3/B/1/PK46	Kitchen Rm30	Bitumen pad to sink	1 off	Y	Good	other	Chrysotile	Sampled	2	5
A4S	01-03-2004 4/3/B/1/PK47	Classrooms Rm26 & 27	Panels to underside of radiator shelf	2 x 0.5 m <sup>2</sup>	Y	Good	Unsealed	Chrysotile	Sampled	4	8	12

# Material and Priority Assessments

**Objective: To assess potential exposure risk from identified ACMs during day-to-day running of school**

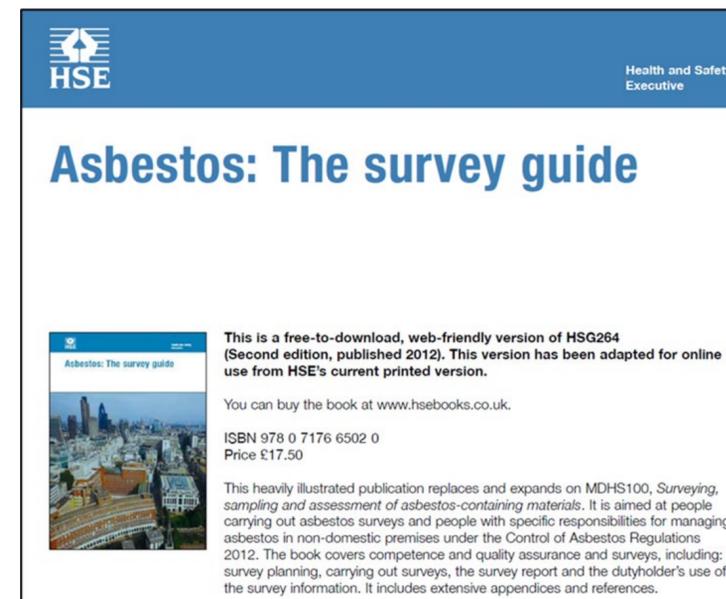


**Material Assessment** – looks at the type and condition of the ACM and how easily it will release fibres if disturbed – **initially completed by Surveyor, then reviewed as part of condition checks/re-inspection**

## Appendix 4 HSG264 Asbestos: The Survey Guide

Considers:

- ✓ Type of Product
- ✓ Type of Asbestos
- ✓ Extent of any damage/deterioration
- ✓ Surface Treatment



### Appendix 4: Material assessment algorithm

Sample variable	Score	Examples of scores (see notes for more detail)
Product type (or debris from product)	1	Asbestos-reinforced composites (plastics, resins, mastics, roofing felts, vinyl floor tiles, semi-rigid paints or decorative finishes, asbestos cement etc).
	2	AIB, millboards, other low-density insulation boards, asbestos textiles, gaskets, ropes and woven textiles, asbestos paper and felt.
	3	Thermal insulation (eg pipe and boiler lagging), sprayed asbestos, loose asbestos, asbestos mattresses and packing.
Extent of damage/deterioration	0	Good condition: no visible damage.
	1	Low damage: a few scratches or surface marks, broken edges on boards, tiles etc.
	2	Medium damage: significant breakage of materials or several small areas where material has been damaged revealing loose asbestos fibres.
	3	High damage or delamination of materials, sprays and thermal insulation. Visible asbestos debris.
Surface treatment	0	Composite materials containing asbestos: reinforced plastics, resins, vinyl tiles.
	1	Enclosed sprays and lagging, AIB (with exposed face painted or encapsulated) asbestos cement sheets etc.
	2	Unsealed AIB, or encapsulated lagging and sprays.
	3	Unsealed lagging and sprays.
Asbestos type	1	Chrysotile.
	2	Amphibole asbestos excluding crocidolite.
	3	Crocidolite.
Total		

Score	Potential to release asbestos fibres
10 or more	High
7-9	Medium
5-6	Low
4 or less	Very low

# Material and Priority Assessments

Objective: To assess potential exposure risk from identified ACMs during day-to-day running of school



**Priority Assessment** – an algorithm that determines the likelihood of disturbance based on human activity – **completed by duty holder/persons familiar with what goes on in school\***

## Appendix 3 HSG 227 A comprehensive guide to managing asbestos in premises

Considers:

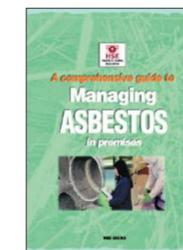
- ✓ Normal occupant activity
- ✓ Location
- ✓ Accessibility
- ✓ Type/frequency of maintenance activity

\*Surveyors can complete this but:

- ✓ Must be in discussion with client
- ✓ Must be competent



### A comprehensive guide to Managing Asbestos in premises



This is a free-to-download, web-friendly version of HSG227 (first edition, published 2002). This version has been adapted for online use from HSE's current printed version.

You can buy the book at [www.hsebooks.co.uk](http://www.hsebooks.co.uk) and most good bookshops.

ISBN 978 0 7176 2381 5  
Price £12.50

This guidance is aimed at people who have a duty to manage the risks from asbestos-containing materials in the premises, ie building owners, tenants and anyone else who has any legal responsibilities for workplaces. The guidance expands on that given in the free leaflet A short guide to managing asbestos in premises, INDG223(rev3) - it will be useful to those in more complex organisations.

# Assessing risk – asbestos insulation board (AIB)

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# Assessing risk – asbestos cement products



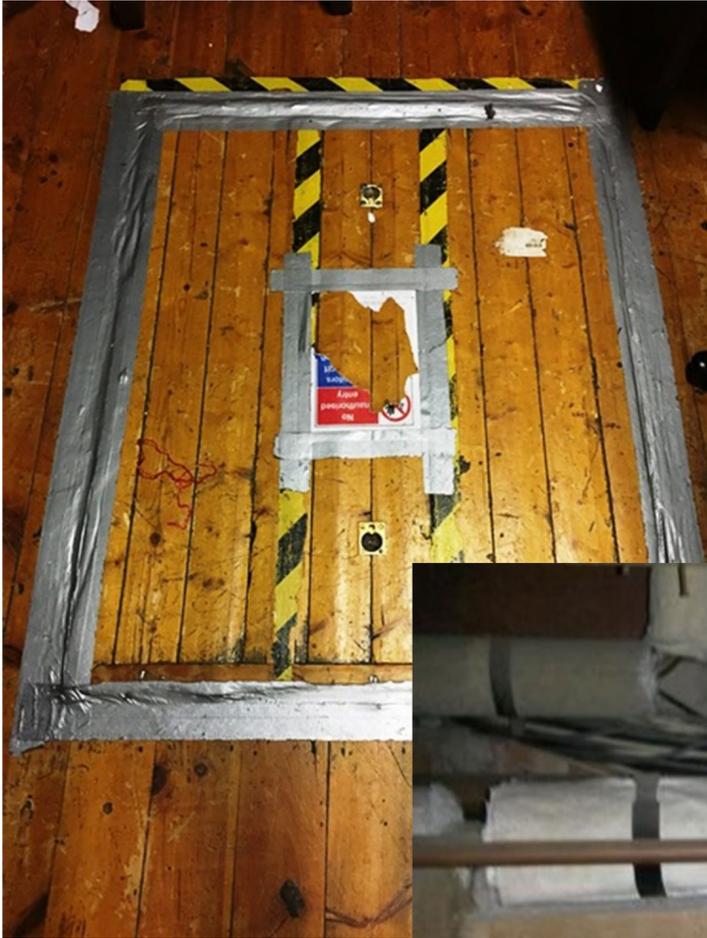
# Assessing risk – floor tiles

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# Assessing risk – hidden ACMs

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## What is the function of an Asbestos Register - what is it meant to do?

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Provide clear information on where asbestos is located for those who occupy and work in the buildings so they can take measures to avoid disturbing the asbestos or if disturbance is necessary that this work is undertaken with appropriate controls in place (including training)

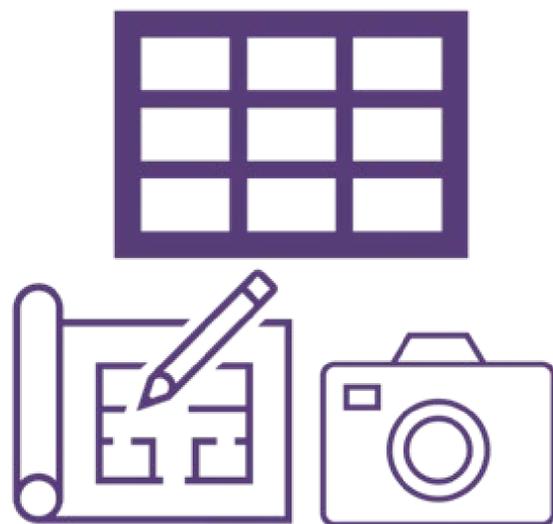
Provide clear information on areas that haven't been inspected and therefore where ACMs must be presumed present until otherwise confirmed

Facilitate the periodic inspection and condition assessment of ACMs to monitor for any damage or deterioration and a place to record the findings

Provide information on (a) the condition of each ACM and (b) the likelihood the ACM will be disturbed given its location. These factors combine to determine the risk from the ACM

Detail any actions required as a result of initial inspection, ongoing periodic inspections or any other reason

## How to make the Asbestos Register Functional for those who use it?



Check that it includes:

- ✓ **All buildings (built before 2000)**
- ✓ Information from **all** surveys and re-inspections
- ✓ **Areas not surveyed** and a warning that these must be presumed to contain ACMs. [Note: To identify these areas, the survey report(s) will need to be looked at for caveats and exclusions.]
- ✓ Can be helpful/reassuring to identify non asbestos-containing materials but which could be suspected.

Ensure it is in a **clear** user-focused format:

- ✓ Organised into specific buildings; floors; rooms
- ✓ Includes clear photos and plans of all ACMs that will allow them to be easily located **and** their condition reviewed (may need more than one photo e.g. a photo of room and close up image).
- ✓ Clear description of the ACM – product type, condition etc.

Ensure **accessible** to everyone who needs it.

## Use of Photos to Effectively Manage Asbestos



**Close up** for condition checks



**Wider shot** for providing info on location and extent

# HSG264 Asbestos Building Plan

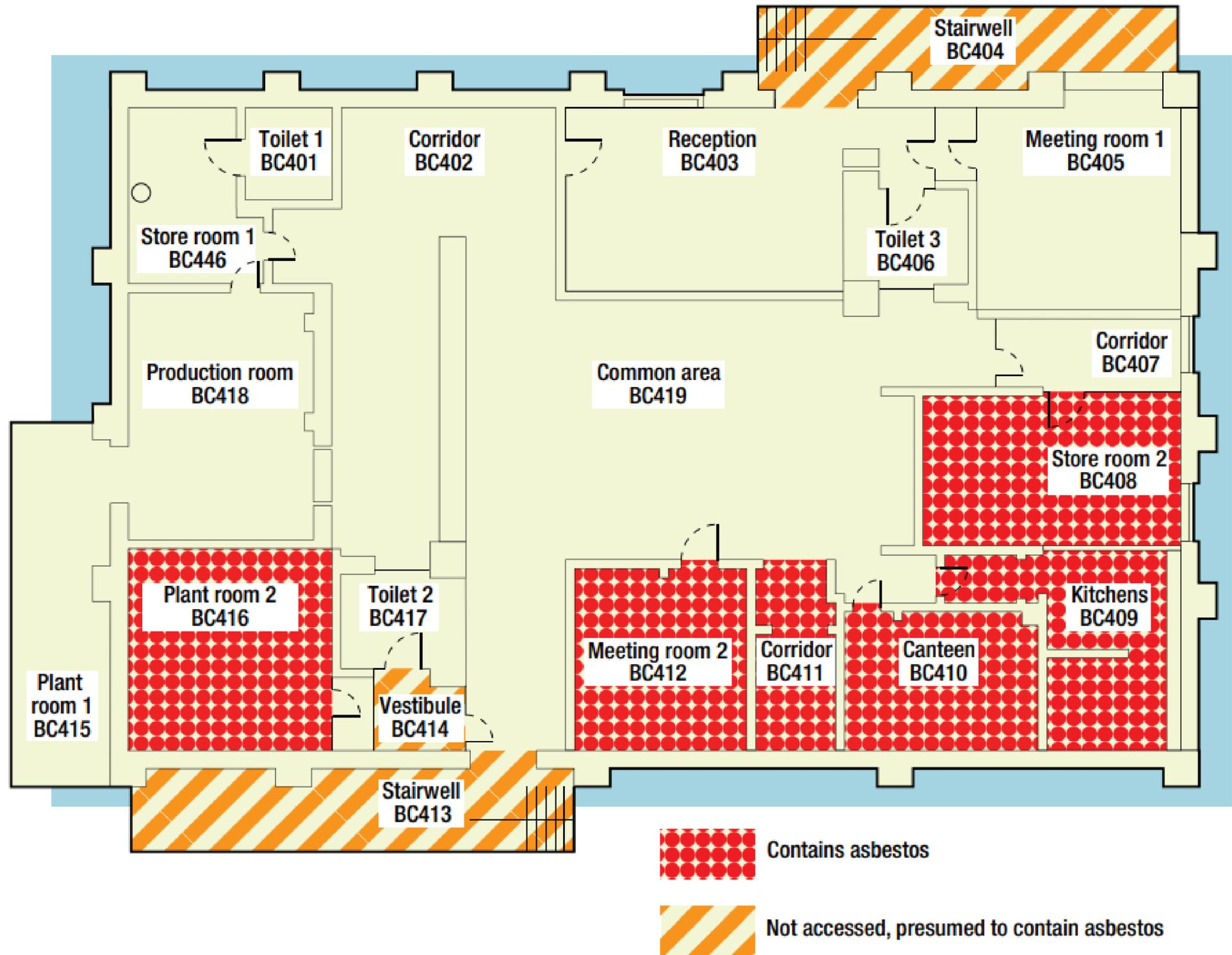


Figure 5 Asbestos building plan

**Unclear  
Site Plan?**



NAG No Access Gained	
Symbol	Explanation
.S001	Sample point of Material containing asbestos
.S001	Sample point with No asbestos detected
X001	Cross reference to taken sample
PrSP	Presumed / Strongly Presumed asbestos
001	GLR generated room number
Job title	
Asbestos Management Survey	
Not for measurement purposes	

## What should be in an Asbestos Management Plan?

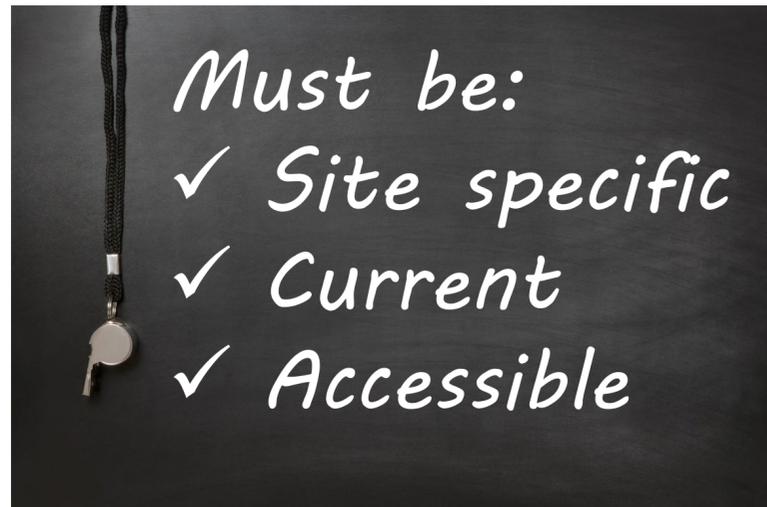
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- ✓ **Identities of those responsible** for managing asbestos risk;
- ✓ **Instruction on how to access the asbestos register**;
- ✓ **Checks and procedures** to ensure identified ACMs are not inadvertently disturbed **and** no work proceeds in un-surveyed areas
- ✓ **Arrangements for routine condition monitoring/re-inspection** of ACMs;
- ✓ **Plans/actions** (short and long-term) for **work to manage risk from identified ACMs** e.g. repair, protect or removal;
- ✓ **Arrangements** to ensure any **work on ACMs** is risk assessed, a method statement/plan of work produced, undertaken by competent and trained persons and fully compliant with CAR12.
- ✓ How the **management plan is communicated** to all those who need to know about it – those liable to disturb asbestos and emergency services;
- ✓ **Contingency arrangements** if the main contact person for asbestos risk management is not available e.g. during school holidays.



## What is an Asbestos Management Plan meant to do?

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Facilitate understanding and cascade of information on how the risk from asbestos is to be managed

Identify those with specific responsibilities and contingency arrangements e.g., school holidays

Set out how asbestos will be managed on a day-to-day basis (operational planning), what happens if things don't go to plan (contingency planning) and what may need to happen in the future (strategic planning)

Provide a framework for audit and review of asbestos management arrangements



**Action:** Do the following in accordance with your management plan

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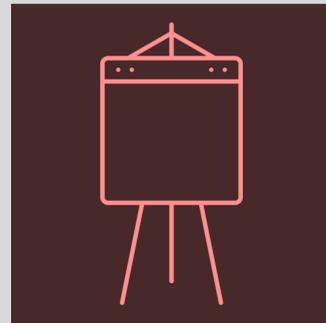
**Remove, repair or protect ACMs** which are in poor condition or likely to be disturbed or damaged through foreseeable activities.

**Ensure this work is completed by someone trained and competent** to carry out licensable work or non-licensable work as appropriate.

**UPDATE Asbestos Register**

**Action:** Do the following in accordance with you management plan

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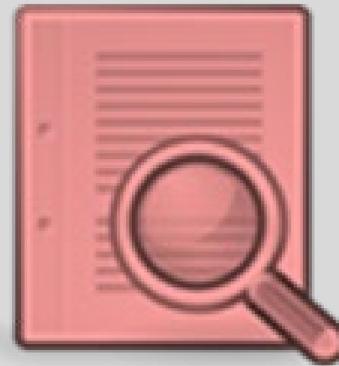


**Provide suitable training** and/or **information** to all personnel with responsibilities for asbestos management and those liable to foreseeably disturb asbestos e.g. maintenance (see [L143](#) paras 137,147 and 225-236).

**REVIEW AMP** when there is a change in personnel.

**Action:** Do the following in accordance with your management plan

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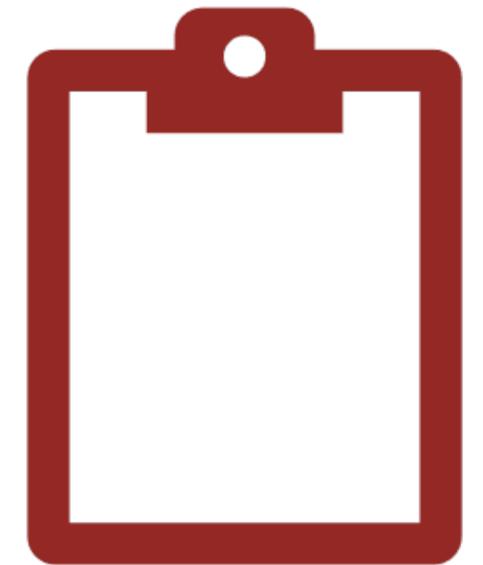
**Complete a periodic condition assessment** of known/strongly presumed ACMs. **Consider** changes in building use /occupancy/ refurbishment plans.

**UPDATE Asbestos Register and Risk Assessment** with findings and **REVIEW** the on-going management action(s).

## **Asbestos Re-inspections (condition surveys/checks)**

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- Re-inspections of known ACMs conducted by surveyors on behalf of the duty holder to fulfil on-going requirement to monitor condition.
  - These service providers must be competent - UKAS identifies this as an accredited service, HSE guidance doesn't specifically reference.
  - Potential problem is that the school will have further re-inspection reports to add to existing survey reports. All this information needs to be managed – retaining the asbestos register as the master document.
- 
- ✓ **Check that the asbestos register has been updated using the results of the last re-inspection**
  - ✓ **Check that any actions have been completed**



**ASBESTOS REGISTER AMENDMENT FORM**

(a) Name & Address of Premises			
(b) Premises Block Ref. or Description			
(c) Name and Signature			
(d) Contact Telephone No.			
(e) Date Amendment Sent	(g) Reason for Notification	Tick	Now complete the appropriate section below
	1. Adverse result of periodic condition monitoring		
	2. Discovery of asbestos not on register		
(f) Notification ID Number	3. Treatment or encapsulation of an asbestos element		
	4. Removal of an asbestos element		
	5. Change of use of room/area where an asbestos element is situated		

1. Adverse Result of Periodic Condition Monitoring / Damaged Asbestos Element	
(h) Asbestos sample ref. on register	
(i) Location of asbestos element	
(j) Description of condition change / damage	

2. Discovery of Asbestos Not on Register	
(i) Location of asbestos element	
(k) Form of asbestos element	
(l) Asbestos type	
(m) Name of asb. analytical company	
(n) Sample report ref.	(Attach copy)

3. Treatment or Encapsulation of an Asbestos Element	
(h) Asbestos sample ref. on register	
(i) Location of asbestos element	
(o) Treatment carried out	
(p) Name of asb. treatment company	
(q) Date of works	
(r) Air monitoring cert. ref.	(Attach copy)

4. Removal of an Asbestos Element	
(h) Asbestos sample ref. on register	
(i) Location of asbestos element	
(s) Name of asb. removal company	
(t)* Four stage air clearance cert. ref.	(Attach copy)
(u)* Background/Reassurance cert ref	(Attach copy)
(v) Waste consignment note ref.	(Attach copy)
(w) Date of works	

\* Usually one or the other of these certificates is expected to be received.

5. Change of Use of Room / Area Where Asbestos is Situated	
(h) Affected asbestos sample ref. on register	
(x) Description of room / area change	

Please return this form to the address below and check that you have attached the relevant inclusions.

**Asbestos & Condition Officer, Capital & Infrastructure,**

**Inclusions**

- Copy of order
- Copy of invoice
- Air test certificates
- Consignment note (if removal)
- Removal notification (if removal)

**ASBESTOS RECORD REVISION SHEET**

*If an asbestos-containing material (ACM) is removed or its status changed in any way this sheet must be completed and sent, with the relevant attachments, to the address below. A copy must be placed in the asbestos register at the premises.*

Property:

Description of the asbestos products involved (attach separate sheet if necessary):

What has been done or discovered:

- Asbestos removed
- Asbestos sealed, encapsulated, protected or covered up
- New asbestos discovered (analysis report attached)
- New asbestos suspected but not analysed (e.g. because it is out of reach)
- Asbestos-containing material in the register found to be in poor condition
- No asbestos detected (analysis attached for information only)

Details of what was done or discovered (attach a separate sheet if necessary):

Any recommendations for further action (if applicable):

Date the work was done (an approximate date will be sufficient):

*Please ensure that you have given, or attached, adequate details. Enough information should be attached for there to be no doubt what has been done or found and where. If possible a photocopy of the asbestos register drawing should be attached with the relevant parts highlighted.*

Name of person submitting this form:

Name of company (if applicable):

Date:



Annual Visual Inspection Sheet

Month: **January 2020**

Building Name: [REDACTED] **Primary School**

**HEALTH AND WORK  
CONFERENCE 2022** 

Inspection No.	Location	Photo	Material	Condition			Action / Remarks	Signature	Date of Inspection
				Good	Fair	Poor			
A1S	Stairwell 5		VFT						

**Asbestos Register for [REDACTED] Primary School**

**Asbestos Samples – Page 1 of 2**

Reports:  
Additional Reports:

A2S	Resource Rm6	
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Inspection Number	Report Date / Sample No	Location / Rm No.	Product type	Quantity	Accessibility Y/N	Condition	Surface Treatment	Asbestos Type	Sampled / Presumed / strongly presumed	MA	PA	PS
A1S	01-03-2004 4/3/B/1/PK30	Stairwell 5	VFT	10 m <sup>2</sup>	Y	Good	other	Chrysotile	Sampled	1	10	11
A1SP	01-03-2004 4/3/B/1/PK27	1 <sup>st</sup> flr Resource Rm7	VFT	145 m <sup>2</sup>	Y	Good	other	Chrysotile	Sampled	1	10	11
A2S	01-03-2004 4/3/B/1/PK32	Classroom Rm8	AIB cladding to steel beams	Significant	Y	Good	Surface Sealed	Amosite	Sampled	6	10	16
(Painted Pink)	01-03-2004 4/3/B/1/PK33	Grd flr stairwell 23	Fascia panel to suspended ceiling	10 m <sup>2</sup>	Y	Good	Surface sealed	Amosite	Sampled	6	10	16
	01-03-2004 4/3/B/1/PK34	Grd flr corridor 22	Cladding panels to structural beams	Significant	Y	Good	Surface Sealed	Amosite	Sampled	6	10	16
	01-03-2004 4/3/B/1/PK35	Grd flr classroom Rm21	Cladding panels to structural beams	Significant	Y	Good	Surface Sealed	Amosite	Sampled	6	10	16
	01-03-2004 4/3/B/1/PK38	Grd flr stairwell 2	Fascia panel to suspended ceiling	10 m <sup>2</sup>	Y	Good	Surface Sealed	Amosite	Sampled	6	10	16
	01-03-2004 4/3/B/1/PK39	Grd flr corridor 2 / classroom Rm4	Cladding to beam above door in ceiling void	Significant	Y	Good	Surface Sealed	Amosite	Sampled	6	10	16
	01-03-2004 4/3/B/1/PK40	Grd flr store Rm7	Cladding to beam	Significant	Y	Good	Surface Sealed	Amosite	Sampled	6	10	16
A3S	01-03-2004 4/3/B/1/PK46	Kitchen Rm30	Bitumen pad to sink	1 off	Y	Good	other	Chrysotile	Sampled	2	5	7
A4S	01-03-2004 4/3/B/1/PK47	Classrooms Rm26 & 27	Panels to underside of radiator shelf	2 x 0.5 m <sup>2</sup>	Y	Good	Unsealed	Chrysotile	Sampled	4	8	12

## Managing Work (maintenance, cleaning, building refurbishment etc.)

- Avoid disturbing or damaging ACMs – reactive / planned
- Planned “work with asbestos”
- Planned construction activity



**Develop robust management arrangements** to assess and control the risk from ACMs during **maintenance, refurb work etc.** to ensure: Information on ACMs is provided and the implications are considered e.g. work won't disturb ACMs, the work on ACMs is licensed or non-licensed (see [Asbestos Essentials sheet A0](#)).

The need for any further survey work is identified before work starts. Work is planned and monitored (consider a permit to work). The work area can be safely reoccupied.

**UPDATE Asbestos Register** where new information becomes available e.g. refurb surveys. **REVIEW AMP** in the event of ACMs being inadvertently disturbed.

## Licensed Work with Asbestos

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All work with High Risk ACMs:

- Asbestos Insulating Board
  - Sprayed coatings
  - Lagging
- Must hold a licence issued by HSE Asbestos Unit
  - Known as a Licensed Asbestos Removal Contractor (LARC)



## Licensed Work with Asbestos

- ✓ Full face powered respiratory protective equipment (RPE)
- ✓ Enclosure under slight negative pressure
- ✓ Controlled removal methods
  - Wetting/soaking
  - Shadow vacuuming
  - Minimal breakage
- ✓ Decontamination Unit
- ✓ 4 stage independent clearance procedure and Certificate of Reoccupation



### Asbestos: The licensed contractors' guide



This is a free-to-download, web-friendly version of the book (First edition, published 2006). This version is available from HSE's current printed version.

You can buy the book at [www.hsebooks.com](http://www.hsebooks.com)

ISBN 978 0 7176 2874 2  
Price £14.50

This book replaces most earlier HSE guidance on asbestos work. It is aimed at businesses holding a licence to carry out repairing or removing asbestos-containing materials (ACMs) work, holding an ancillary licence or providing a service to those who carry out work with asbestos insulating board using their own employees. It is also useful to people awarding contracts for asbestos management duties.

The guidance is split into eight chapters covering the law, how to work safely with asbestos and how to manage asbestos.



## Non-Licensed Work with Asbestos

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All work on Lower Risk ACMs such as:

- Asbestos cement
- Textured coatings
- Composite materials

Must still:

- ✓ Complete a RA and Plan of Work/Method statement
- ✓ Put adequate precautions in place
- ✓ Be trained and competent





← Asbestos

Overview

Publications

Asbestos essentials

Image gallery

Case studies

Videos

Research and reports

Learning package

# Asbestos essentials

## The asbestos web app is currently unavailable

You can download the asbestos essentials task sheets below, they are for building, maintenance and allied trades on how to safely carry out non-licensed work involving asbestos.

## Asbestos essentials task sheets

For advice on when and how you should use these sheets make sure you printout and read [A0 - Introduction to Asbestos essentials \(PDF\)](#).

- [Equipment and method sheets](#)
- [Work with asbestos cement \(AC\) \(non-licensed\)](#)
- [Working with textured coatings \(TC\) containing asbestos \(non-licensed\)](#)
- [Strictly controlled minor work on Asbestos Insulating Board \(AIB\)](#)
- [Safe work with undamaged asbestos materials](#)
- [Removal and replacement of other asbestos containing materials](#)
- [Fly-tipped waste](#)

## Equipment and method sheets

- ▶ [EM0. Risk assessments and plans of work \(PDF\)](#)
- ▶ [EM1. What to do if you discover or accidentally disturb asbestos during your work \(PDF\)](#)
- ▶ [EM2. Information, instruction and training \(PDF\)](#)


Health and Safety Executive

## a1

asbestos essentials

## Drilling holes in asbestos insulating board (AIB)

**Non-licensed tasks**

**Essential information**

**Important:** You must read sheet a0 *Introduction to asbestos essentials*

Also read the following sheets:

- em0** Risk assessments and plans of work
- em1** What to do if you discover or accidentally disturb asbestos during your work
- em2** Information, instruction and training
- em4** Using a Class H vacuum cleaner for asbestos
- em6** Personal protective equipment (including RPE)
- em7** Using damp rags to clean surfaces of minor asbestos contamination
- em8** Personal decontamination
- em9** Disposal of asbestos waste

**What this sheet covers**

This sheet describes good practice when you need to drill into AIB to attach fittings, or to pass through cables or pipework.

This sheet is *not* appropriate if work lasts more than one hour for one worker in a seven-day period, or exceeds two hours for two or more workers in a seven-day period; use an HSE-licensed contractor for such work.

**Preparing the work area**

- Ensure safe access.
- Restrict access – minimise the number of people present.
- Close doors. Use tape and notices to warn others.
- If feasible, also restrict general access to the rear of the AIB.
- If this is not possible, warn the building owner that this area is contaminated.
- Ensure adequate lighting.

**Equipment**

- 500-gauge polythene sheeting and duct tape
- Warning tape and notices
- Class H vacuum cleaner (BS 8520) – see sheet em4
- Drill – manual or powered, set at the lowest speed
- Drill bit, or hole cutter for holes greater than 20 mm diameter
- Drill cowl for vacuum cleaner nozzle, to extract around the drill bit
- Masking tape
- Thick paste, eg wallpaper paste or shaving foam, or a drill cowl to contain drilling debris
- Permanent sealant
- Plastic or metal sleeve to protect hole edges
- Bucket of water and rags
- Asbestos waste bag
- Clear polythene bag

1 of 3 pages


Health and Safety Executive

a1 – Drilling holes in asbestos insulating board (AIB)

**Other hazards**

Work at height: See [www.hse.gov.uk/work-at-height](http://www.hse.gov.uk/work-at-height). Take precautions to avoid falls.

There may be other hazards – you need to consider them all.

Registration at [www.gassaferegister.co.uk](http://www.gassaferegister.co.uk)





Drill through paste or foam or use a drill cowl and a Class H vacuum cleaner. A hand drill creates less dust. If you have to use an electric drill, put it on the slowest setting.

**Personal protective equipment (PPE) – see sheet em6**

- Provide:
  - disposable overalls fitted with a hood;
  - boots without laces (laced boots are hard to decontaminate);
  - respiratory protective equipment (RPE).



**Procedure**

- Protect nearby surfaces from contamination. Cover with 500-gauge polythene sheeting and fix with duct tape to non-asbestos surfaces.
- Cover the drilling point and the rear (if accessible) with masking tape to prevent the edges crumbling.
- For cable and pipework, make the hole slightly bigger than required.

**Method 1: Drilling 1 to 5 holes up to 20 mm in diameter in board less than 6 mm thick**

- Cover the drill entry and, if accessible, exit points, with a generous amount of paste, foam or a drill cowl.
- Drill through the paste, foam or cowl.
- Clean off the paste, foam and debris with damp rags, or remove the cowl and clean the surface. Clean the back surface with damp rags, if accessible.
- Rags and paste or foam contain dust and fibres. Dispose of as asbestos waste.
- Seal the drilled edge with sealant.
- Insert a sleeve to protect the hole's edges from cabling etc.

**Method 2: Drilling 6 to 20 holes, or any hole over 20 mm in diameter, or drilling through board more than 6 mm thick**

- Place the drill cowl over the drill point. Put the drill bit or cutter through the cowl opening.
- Attach the Class H vacuum cleaner hose to the cowl. Turn it on.

2 of 3 pages


Health and Safety Executive

a1 – Drilling holes in asbestos insulating board (AIB)

- Drill the hole.
- Vacuum the drilled hole, and the rear of the board if accessible.
- Seal the drilled edge with sealant.
- Insert a sleeve to protect the hole's edges.





Control measures: shadow vacuuming and using drill cowls as local extraction

Seal the drilled edge with sealant

**Cleaning and disposal**

- Clean the equipment and the area with the Class H vacuum cleaner and/or damp rags.
- Put used rags, polythene sheeting and other waste in the asbestos waste bag and tape it closed.
- Put the asbestos waste bag in a clear polythene bag and tape it closed.
- Disposal – see sheet em9.

**Personal decontamination**

See sheet em8.

**Clearance and checking off**

- Visually inspect the area to make sure that it has been cleaned properly.
- Clearance air sampling is not normally required.
- Get the premises owner, dutyholder or client to check off the job.

For information about health and safety, or to report inconsistencies or inaccuracies in this guidance, visit [www.hse.gov.uk/](http://www.hse.gov.uk/). You can view HSE guidance online and order priced publications from the website. HSE priced publications are also available from bookshops.

This guidance is issued by the Health and Safety Executive. Following the guidance is not compulsory, unless specifically stated, 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.

This document is available at: [www.hse.gov.uk/asbestos/essentials/](http://www.hse.gov.uk/asbestos/essentials/)

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Published by the Health and Safety Executive 09/17

3 of 3 pages

## Review and Update of Management Plan

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The AMP including records (i.e. asbestos register, associated photos and site plans) should be reviewed

- every 12 months OR
- if circumstances have changed such as
  - changes to the organisational structure and/or staff
  - resourcing the management plan
  - changes to organisational procedures
  - changes in building use/occupancy e.g. COVID /refurbishment
  - building or maintenance work
  - any instances of procedural failure e.g. incident



# **Inspection Campaigns**

## Previous Inspections

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- Targeted sample of 151 schools across GB (2018-2020)
- Independent schools, Academies, Voluntary Aided Schools and Local Authority Schools
- Broad range of building types and asbestos profiles known to contain ACMs
- Single issue inspection focussed on management of asbestos
- Visits made by appointment
  
- 14 Improvement Notices served on 11 dutyholders

## Positive observations

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### Evidence from inspections that:

- Significant resource and effort had been focussed on the management of ACMs
- Schools were generally aware of 'duty to manage' obligations and
- Aware of presence of ACMs in buildings under their control
- ACMs can be managed effectively in situ e.g. use of PTW procedures to manage contractors and work liable to disturb them

## **Positive observations (continued)**

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### **Controls most effective where:**

- Clear ownership of the risk
- Transparent arrangements for monitoring the condition of the ACMs
- Effective controls for managing work and activities liable to disturb ACMs
- Staff have the relevant knowledge, training, experience and capacity

## Previous inspection findings

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- Surveys
- Register
- Asbestos Management Plan (AMP)
- Active management
- Governance
- Training
- Managing Contractors
- Monitoring and Review

## **Schools inspection programme 2022/23**

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- Sample of 400 primary and secondary schools across GB
- Selected on the basis that they have asbestos-containing material on the premises and to achieve a reasonable geographical spread across GB
- Single issue inspection focussed on management of asbestos
- Visits made by appointment (September 2022 – March 2023)

## Inspection Aims

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- To assess the effectiveness of the management arrangements and controls in place across a range of school types and governance models within GB
- Provide intelligence as to:
  - the controls in place to prevent asbestos from being disturbed through maintenance and construction activity in schools; and
  - the level of compliance with “duty to manage asbestos” in schools (Regulation 4, CAR 2012)

## Scope of inspections

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Visits will require schools to provide evidence and demonstrate that they have in place:

- management arrangements and procedures to ensure risks are controlled
- clearly identified and understood roles and responsibilities associated with the asbestos management plan
- active arrangements to manage and monitor the condition of ACMs within school buildings
- robust arrangements to control the risks associated with the foreseeable disturbance of all ACMs

## **Possible Enforcement Outcomes**

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- No Further Action (NFA)
- Advice
- Letter and Notification of Contravention (NoC)
- Enforcement Notice (Improvement/Prohibition)
  
- Consider Prosecution

## What next?

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- Visits to be carried out September 2022 - March 2023
- Inspection findings to be analysed and outcomes shared in late 2023

## Relevant Guidance

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- The duty to manage asbestos - <http://www.hse.gov.uk/asbestos/duty.htm>
- Asbestos in schools – <http://www.hse.gov.uk/services/education/asbestos.htm>
- Managing asbestos in your school or college
  - England – <https://www.gov.uk/guidance/asbestos-management-in-schools>
  - Wales – <https://gov.wales/asbestos-management-schools>
- Asbestos in system buildings – <http://www.hse.gov.uk/services/education/asbestos-system-buildings.pdf>

# Questions?

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