

Asbestos management in schools

Guidance

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Audience Duty holders and others in schools who have a role to play in the safe management of asbestos in schools. This includes local authorities, headteachers, school business managers, facilities managers, school governors, all teaching and support staff involved at schools, maintenance and caretaking staff, trade union health and safety representatives, members of school management teams and charitable trusts working in schools containing asbestos.

Overview This guidance is intended to provide an overview of what school duty holders need to do to ensure the risk associated with asbestos-containing materials (ACM's) within schools are controlled. It gives duty holders an understanding of their obligations and duties; and also signposts more detailed guidance material and support for schools.

Action required School management teams need to ensure that maintenance, repair work and improvements on school buildings are carried out safely. They should take the following steps to manage the asbestos in their school:

- Conduct a 'management survey' of asbestos-containing materials (ACMs).
- Assess the risk associated with those identified ACMs.
- Devise a plan for managing asbestos.
- Make sure staff, visitors and contractors know the risks and precautions to take.
- Make sure a refurbishment and demolition survey is undertaken should any work be required on the school building.
- Keep the management of asbestos under active review.

Further information This guidance will be periodically updated to ensure it contains the most current advice. Enquiries about this document should be directed to:
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Additional copies This document can be accessed from the Welsh Government's website at <https://gov.wales/asbestos-management-schools>

Related documents *Asbestos management in schools 138/2014*

Mae'r ddogfen yma hefyd ar gael yn Gymraeg.
This document is also available in Welsh.

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1. Introduction

Your school buildings may contain asbestos if any part of them was built before 2000. It is extremely important that any asbestos present in your school is managed properly. If the steps set out in this advice are not followed, the future health of schools staff and pupils may be at risk. Duty holders could also face prosecution if they fail to comply with the Control of Asbestos Regulations 2012.

School management teams should take the following steps to manage the asbestos in your school:

- Conduct a 'management survey' of asbestos-containing materials (ACMs).
- Assess the risk associated with those identified ACMs.
- Devise a plan for managing asbestos.
- Make sure staff, visitors and contractors know the risks and precautions to take.
- Keep the management of asbestos under review.

If you need to undertake any refurbishment work or disturb the fabric of a building that contains asbestos, you may need to commission a refurbishment and demolition survey which will give you a more detailed understanding of the asbestos present in the building.

If there is an incident of asbestos exposure at your school you should take the necessary steps to ensure that everyone is safe and, unless the incident is very minor, you will need to report this to the Health and Safety Executive.

2. What is asbestos and when does it become a risk

The majority of school buildings contain asbestos. This can be visible or hidden as in CLASP/System Build construction. Asbestos is a naturally occurring fibrous mineral which was incorporated into a wide variety of materials that became part of buildings or articles in the UK up to the year 2000. Before the health effects of its fibres were fully understood, asbestos was considered a valuable building material as it had high strength and fire resistance. It was extensively used in schools for fire protection and insulation between 1945 and 1975. If managed carefully, the presence of asbestos in your school will not pose a risk to your staff and pupils. However, poor management of asbestos in your school could endanger lives.

Undamaged, encapsulated or sealed materials will not release fibres. However, problems arise if materials containing asbestos are disturbed or damaged, asbestos fibres can be released into the air and breathed in by staff and children. This puts them at potential risk of contracting a number of serious diseases in later life, including mesothelioma and lung cancer.

Exposure to asbestos can cause serious health problems, including mesothelioma and lung cancer. However, the relative risks of asbestos exposure in a school setting and the question of whether children are at greater risk than adults are not fully understood. The Department of Health's Committee on Carcinogenicity concluded that, due to their increased life expectancy compared to adults and the long latency period for the disease to develop, children have an increased lifetime risk of developing mesothelioma if exposed to a given dose of asbestos¹. The activities most likely to lead to the disturbance of **asbestos-containing materials (ACMs)** in schools are building and maintenance/repair and improvement works. Examples of this would include installation of new ICT equipment and cables; window replacements, alterations to classroom structure and installing display equipment refurbishment projects.

ACMs can also be disturbed through vandalism, accidental damage and boisterous behaviour.

Key Resources:

[HSE website asbestos pages](#)

[HSE video: an asbestos victim's story](#)

¹<https://www.gov.uk/government/publications/relative-vulnerability-of-children-to-asbestos-compared-to-adults>

<http://www.hse.gov.uk/services/education/asbestos-system-buildings.pdf>

3. Responsibility for the safe management of asbestos in your school

3.1 The legislative framework

The Health and Safety at Work Act 1974 requires employers to protect their employees at work. In schools, it also requires that pupils, visitors and all other persons are protected from harm to their health and safety from known or foreseeable risks. Whilst the employer can delegate responsibilities, functions or roles to schools staff the 'duty' cannot be delegated and rests with the employer. It is the role of the employer to ensure that there are suitable arrangements in place to manage the ACMs within a school and monitor the effectiveness of those arrangements.

'The Regulations' place specific duties on those who manage non-domestic premises to identify the presence of asbestos-containing materials and manage the risks they present. The Regulations also place duties on other persons, such as contractors for example, to protect their employees.

If you are responsible for the maintenance, repair or improvement of school premises, or of equipment that uses asbestos-containing materials, you will have responsibilities under the duty to manage asbestos.

3.2 The duty holder

The legal responsibility for the safe management of asbestos lies with the 'duty holder'. The duty holder is defined in Regulation 4 of The Control of Asbestos Regulations 2012 ("the Regulations") as anyone who has an obligation for the maintenance or repair of non-domestic premises by virtue of a contract or tenancy. If there is no person with such an obligation, then the duty holder is the person who has control of the premises or any means of access to and from them.

For most schools, the main duty holder will be the employer, the local authority. However, the employer varies in different types of schools:

For community schools, community special schools, voluntary-controlled schools, maintained nursery schools and pupil referral units the local authority are the duty holder (see section 35 and 26 of the Education Act 2002 and the Staffing of Maintained Schools (Wales) Regulations).

For foundation schools it is the school head and governing body. For voluntary-aided (VA) and, responsibility for the provision, repair and maintenance of a VA School is shared between the school governors and the local authority. The Governors are responsible for the external fabric of the school. The local authority is responsible for the repair and maintenance and for the initial provision of the kitchen, dining hall, medical inspection room, caretaker's house and playing fields.

For independent schools, the duty holder may be the proprietor, governing body, board of trustees or equivalent.

In situations where budgets for building management are delegated to schools by the local authority, the responsibility to manage asbestos will be shared between schools and the local authority. The authority's written scheme for the financing of maintained schools will set out the categories of work that will either be financed from the delegated school budget share (revenue repairs and maintenance) or remain the responsibility of the local authority (capital expenditure). Both parties will therefore have responsibilities for the repair and maintenance of the premises.

Although roles, responsibilities and functions may be delegated to the school management team and nominated individuals, the local authority as the employer retains the duty under the Health & Safety at Work Act 1974. As such, the employer must ensure that there are suitable asbestos management arrangements in place, that those with the delegated responsibilities are suitably trained and knowledgeable to undertake their role and that there is suitable monitoring to ensure that the arrangements have been implemented and the risks are being controlled. It is essential that the roles and responsibilities of all relevant parties are set out clearly and fully understood to ensure compliance with Regulations

Although you may not be the legal duty holder, all those involved in the management and operation of a school, play an important role in the safe management of asbestos.

The law requires the employer to consult with employees on matters that affect their health and safety, including asbestos management. This includes teaching staff, support staff and other site staff. Particular attention should be paid to those who regularly carry out general care and maintenance work in the school e.g. the school care taker. Union safety representatives can use their regular health and safety inspections to raise awareness of asbestos and discuss concerns with their members and management. If you do not follow the steps set out in this advice, you may put the future health of your staff and pupils at risk. The duty holder could also face prosecution, by failing to comply with the Control of Asbestos Regulations 2012.

Health and safety legislation does not require schools to inform parents about the presence of asbestos in their children's school. Some schools do provide parents with information to assure them that effective management arrangements are in place. In normal circumstances, if parents request information, schools should be responsive to this. HSE guidance on gov.uk already explains that if management arrangements at the school to prevent disturbance of ACMs fail and there is an accidental release of asbestos fibres, then it is important that those affected are informed.

4. Day-to-day management of asbestos in your school

Step 1: Conduct a management survey of asbestos-containing materials in your school

Each school must have a suitable, sufficient and up to date survey of the buildings to identify the presence of ACMs. The survey should provide the school with a current and accurate picture of the presence of ACMs within accessible areas and identify the limited inaccessible areas within buildings where the presence of asbestos is presumed or cannot be ruled out.

A management survey is the standard survey.

As well as positively identifying ACMs the survey should seek to identify areas where ACMs are presumed or are likely to contain asbestos and be clear in respect of areas where the presence of asbestos cannot be ruled out. The survey should also include an assessment of foreseeable maintenance and installation which may damage or disturb existing ACMs and assessment of their condition. More information can be found from in the Health and Safety Asbestos Survey guidance listed in key resources at the end of this section.

You need to do this for all buildings constructed before 2000, including new buildings with residual elements of pre-2000 buildings. This survey must be comprehensive and systematic, establishing the location, type and condition of ACMs. The information collected within the survey will be used to produce an Asbestos Register. The survey should be conducted in accordance with HSE guidance and, ideally, undertaken by a surveying organisation accredited by United Kingdom Accreditation Service (UKAS).

A management survey may only include areas of the buildings that are accessible to the surveyor. Depending on the nature of the building, it may not include voids above the ceilings or under-floor ducts. As such, it will not identify all ACMs with a building and, therefore, the presence of asbestos in areas not covered by the survey should be presumed. The survey may require some minor intrusion into the fabric of the building and the taking of samples to identify if materials contain asbestos. However, to avoid the spread of any asbestos fibres, disturbance should be kept to the minimum level necessary to undertake the survey. This means your management survey will only tell you about ACMs that are easily accessible. It is only suitable for managing asbestos during the normal occupation and use of your school. If you undertake any building works in your school, you may need a refurbishment and demolition survey of the areas where the work is to take place in order to identify the presence of asbestos in inaccessible areas that were not included in the management survey. Any proposed works should be assessed to check that the current surveying information is sufficient for the work to be undertaken. This assessment should be undertaken by someone competent to carry out this function.

Using their experience of construction, the surveyor should include an indication of the likely locations and type of the presumed ACMs liable to be present in the presumed areas.

In some cases, surveys have been considered to be inadequate or do not reflect the current status of the buildings and ACMs. Where surveys are considered inadequate they should be repeated. Schools should review their survey and ensure that it:

- Was undertaken by a suitably qualified / accredited surveyor;
- Covers all relevant buildings/structures associated with the school and includes all areas which are considered as accessible (including switch rooms are accessible for routine inspection /maintenance by contractors);

- Clearly identifies any areas that were not surveyed, with reasons why and that the implications of this and any other limitations or caveats within the survey are considered and planned for;
- Clearly identifies the location, quantity, type and condition of the ACMs identified and what they look like;
- Clearly identifies genuinely inaccessible areas where the presence of asbestos is foreseeable or cannot be ruled out and as such must be presumed;
- Is regularly updated to accurately reflect the current locations of the ACMs in their premises;
- Remains a current and relevant basis for their risk management arrangements.

Key Resources:

[HSE guidance on management surveys Asbestos: the survey guide](#)

[The United Kingdom Accreditation Service \(UKAS\)](#)

Step 2: Assess and reviewing the risks associated with asbestos-containing materials in your school

Schools must ensure that there is a suitable and sufficient assessment of the risks to health posed by the ACMs. This needs to be fit for purpose and reflect the current locations and conditions of the ACMs and how the buildings are used. It is important that any survey is not conducted in isolation. The duty holder needs to work in conjunction with the local authority technical officer who, in turn, can arrange for asbestos surveyors to establish the risk that ACMs might be disturbed on behalf of schools; devise a asbestos management plan and brief the head teacher where necessary on how this is to be used.

When considering the likelihood of disturbance, it is important to recognise the use of the location and the people who may be present, i.e. what may be disturbed in the course of routine maintenance or everyday activities. Children may be more likely than adults to engage in activities that may disturb or damage ACMs. The priority assessment should be used to inform planning and active management.

The assessment has three parts:

- i. **'Material' assessment** – this is usually provided within the survey and is an assessment of each item of asbestos material identified based upon the type of material, the type of asbestos it contains, its surface treatment and the extent of damage.
- ii. **'Priority' assessment** – this is your assessment of the likelihood of someone disturbing the material based upon factors such as the number and type (e.g. children) of people using the room, the time they spend in the room, the location, accessibility and extent of the asbestos and the frequency and type of activity that might disturb it.
- iii. **'Total' assessment** – the assessments from the Material and Priority assessments are combined to give the total risk assessment. This allows a comparison to be made of the risk presented by each item of ACMs in the building so that priorities can be set and plans made for managing the materials

If asbestos in your school building is in good condition and is unlikely to be damaged or disturbed, it is usually safer to leave it in place and regularly monitor its condition. A change of circumstances (such as change of building use) will require a review of the assessment. If any ACM is in bad condition or at risk of being damaged or disturbed, professional advice should be sought regarding necessary remedial works, which may include enclosing, encapsulating or removing the asbestos.

The methodology for the determination of the material assessments is detailed in HSG 264, which includes advice on the interpretation of the risk assessment scores generated through this process. The methodology for the Priority Risk Assessment Algorithm is included in the HSE Guidance document HSG 227, a comprehensive guide to management of asbestos in premises. Both these documents are included in the Key Resources Box below.

Schools should review their assessments to ensure that:

- They were undertaken by a suitably qualified/ competent person and developed by, or in conjunction with, the school such that it reflects how and by whom the premises is used and the risks ACMs may pose through foreseeable activities;
- It reflects the profile of ACMs and offers a clear distinction between lower and higher risk ACMs to indicate the priorities and implications of the presence of ACMs, which will in

turn inform the arrangements and frequency of monitoring the conditions of ACMs;

- It includes areas identified within the survey presumed to contain asbestos;
- There are arrangements for review and update at suitable intervals.

The findings of the Survey and the Assessment are normally combined to offer an overall picture of locations and risks in a record commonly called an Asbestos Register (or equivalent document). There should be a clear and easy to understand record (including drawings and photographs where relevant) which details the location, extent and condition of the ACMs – identifying their forms/ material types and what they look like. The register also should provide a clear indication as to the parts of the building where the presence of ACMs is presumed. The summary provided by the asbestos register should also clearly identify any areas of the school which were not captured within the management survey and therefore where the presence of asbestos cannot be ruled out. It should clearly identify that these areas will need to be subject to a further survey ahead of access for subsequent maintenance or construction work.

Regular update of the register is required so that it provides an up to date and accurate reflection as to the current knowledge in respect of the locations of ACMs within the building. The register should be updated following work which involved the removal of asbestos and when further ACMs are identified following further surveys. The asbestos register should also be used to inform the Asbestos Management Plan and in respect of the active monitoring of the ACMs identified.

Key Resources:

[Example scoring system](#)

[‘Managing my Asbestos’](#) A step by step guide produced by HSE

[‘Health and Safety Guidance \(HSG\) 227, A comprehensive guide to managing asbestos in premises’](#) – in particular Appendices 2, 3 and 4

[Health and Safety Guidance \(HSG\) 264, Asbestos: The Survey Guide](#)

Step 3: Devise a plan for actively managing the risk from asbestos in your school

A relevant and current Asbestos Management Plan (AMP) for the school is essential. The plan should set out your day to day management arrangements for controlling the risks from ACMs in the school during normal and foreseeable activities in the premises. The Asbestos Register information should have been used to inform the AMP. The Register and the AMP should be shared with (and/or subject to consultation with) relevant safety representatives and all staff, particularly maintenance and cleaning staff.

Your AMP will include details of:

- Clear leadership commitment and statement on ownership of the risk;
- Clear roles and responsibilities of specific individuals (and/or organisations) associated with the arrangements, which should be accompanied by an accurate statement of the current organisational structure and governance of the school which might be in other documentation;
- Procedures for controlling routine and responsive maintenance work, including management of contractors;
- Emergency procedures to be actioned in the event of accidental or inadvertent disturbance of ACMs, including after school activities and community use;
- Training to be provided to all those who could come into contact with ACMs in the school buildings (for example, Awareness Training);
- Training to be provided to those who have specific Asbestos Management duties in the school;
- Discussion of AMP as part of staff inductions, toolbox talks, and at governors meetings.
- Nomination of those who can make entries to or amendments to the AMP; and
- The formal arrangements for reviewing and updating the AMP.

In particular the management arrangements should also ensure that:

- All relevant staff identified within the plan are aware of their roles and equipped with sufficient knowledge, experience and training to carry out the roles identified;
- There is a mechanism to regularly, actively monitor and formally record the condition of the identified accessible ACMs and also the general condition of the buildings to identify any deterioration to ensure that the risks associated with asbestos or presumed asbestos are effectively controlled. (This includes areas of the building where enclosure, encapsulation or sealing of the ACM is used to manage risk – for example, the mastic sealant in the seams of column casings within CLASP buildings). The frequency of the monitoring of the ACMs should be informed by the priority assessment;
- There is there a clear understanding of what action needs to be taken if, despite all your work, ACMs are inadvertently disturbed or damaged.

Step 4: Make sure staff, contractors and other visitors know the risks and precautions they need to take and are properly trained

Everyone in your school management chain will have a part to play in making sure asbestos is managed effectively on your school premises. It is essential that all relevant staff and other workers including cleaning and caretaker staff are advised on the location and implications of ACM's identified, receive the right information, instruction and training and are clear what precautions to follow by the Building Manager and/or Headteacher with the support of the local authority technical officers. Particular focus should be given to individuals who have responsibility for monitoring and assessing the condition of the ACMs (and the wider fabric of the building) and staff who regularly undertake maintenance or cleaning work. Asbestos risks should also be explained to temporary, agency and supply workers (teaching / support staff) regardless of the duration of their employment with the school.

Most teachers and school staff are not directly involved in managing the buildings or in carrying out repair or maintenance work. However, where schools are responsible for directly commissioning minor maintenance work and small projects, duty holder responsibilities will apply; to ensure that ACMs are not damaged or disturbed with such works.

In all situations, schools and their staff will need to know the location of any ACMs and how they can be damaged or disturbed e.g. by work being pinned to walls or through unruly behaviour of pupils. Staff should be instructed to report damage or deterioration of school fixtures or fittings that could lead to the release of asbestos fibres. Visitors, contractors and out-of-hours/community users of the building should be advised of any action they may need to take in respect of ACMs.

The Appointed Person for asbestos management in individual schools will need to receive specific appropriate training. This needs to be delivered by a recognised Asbestos training provider holding an Approval through a recognised training approval organisation, and in accordance with requirements of regulation 10 of the Control of Asbestos Regulations 2012 and the advice included in the Approved Code of Practice L143 e.g. the United Kingdom Asbestos Training Association (UKATA). Schools should have effective arrangements for identifying/reporting damage and taking proportionate steps to ensure that any risks associated with damage or deterioration are identified and controlled.

The duty holder should ensure that those individuals or organisations identified in the plan with specific roles and responsibilities are provided with suitable training, information and knowledge and time to carry out their role effectively. Where responsibilities fall to an individual consideration should be given to nominating a deputy for business continuity purposes.- you have identified the need for training – it may just be a case of having the “capacity” to undertake their role and the issue around the business continuity issue of having a deputy.

The Asbestos Register should be available on site and in a format that can be available and readily understood if requested as part of any emergency response. This is in line with regulation 4 of CAR 2012, which includes making the plan available to any person that may disturb asbestos, including emergency services. The Register should be used to inform the planning and assessment of any planned or reactive maintenance and construction works within the school and the implications in respect of the ACMs.

Key Resources:

You can review how your school is performing on asbestos management by using the [Health and Safety Executive \(HSE\) checklist](#)

[Advice on information, instruction and training](#) is also available on the HSE website

Step 5: Keep the management of asbestos in your school under review

The AMP should be produced in accordance with advice provided in the ACOP L143 (see paragraph 143 and regularly reviewed (every 12 months as a minimum). It should be updated where:

- there is new information, for example from refurbishment and demolition surveys;
- work is undertaken on ACMs;
- damage occurs;
- ACMs are removed;
- Room changes occur, e.g. type of use of the room changes;
- Building layout changes that affect the position of the ACMs.

Schools should also ensure that:

- There are clear arrangements to regularly review (at least annually) and update the survey, assessment and Register such that it reflects the current status of the ACMs within the school. Procedures should recognise the limitations of the information held and identify when further information (including a refurbishment and demolition survey) is required.
- Those that are undertaking the regular inspections have undergone the appropriate training to ensure they are aware of how to identify potential asbestos areas and record their observations, and understand how, if necessary, to make adjustments to the material and priority risk assessment scores.
- There are suitable arrangements to ensure that the condition of the ACMs is actively and regularly monitored in accordance with a clear schedule informed by the assessments of the ACMs. This monitoring should be suitably recorded and ensure that the control measures that prevent access, offer protection, encapsulate or seal the ACMs remain effective.
- The monitoring extends to assess the implications of the wider condition of the general fabric of the school buildings to ensure that the risks associated with areas where ACMs are presumed to be present are also controlled.
- There are suitable monitoring and auditing arrangements to ensure that the management plan is followed and effective.
- Any changes to the Asbestos Register or your Asbestos Management Plan will need to be communicated to all relevant staff by the school leadership team.

5. Managing asbestos when building or maintenance work needs to be done

There are specific actions that you must take [under the Control of Asbestos Regulations 2012](#) when work is carried out on the premises which might disturb ACMs (including upgrading, refurbishing or demolishing), especially with respect to working practices between the duty holder, school and contractors under Regulations 4 and 5. This includes any work that intrudes on the fabric of your building, whether it is small-scale repair work carried out by your own staff or a large-scale project that is being contracted out.

Where building work needs to be undertaken, there must be robust and effective management arrangements in place to ensure that ACMs are not disturbed by maintenance or construction activities. Work liable to disturb the fabric of the building should be subject to proportionate control measures. Any person undertaking this type of work within premises where asbestos is present should have relevant asbestos awareness training to allow them to identify ACMs should they encounter or expose them so they recognise when to stop during any work. It is advised that any work undertaken is organised in conjunction with the local authority's technical departments.

Work liable to disturb asbestos pipe lagging, loose insulation, sprayed coatings and Asbestos Insulating Board (commonly found in school buildings as ceiling tiles, wall panels, soffits, cladding to structural steel work and linings to warm air heaters) will for the most part require the appointment of licensed contractors. Some small, short duration tasks which disturb ACMs can be carried out by non-licensed workers provided they have received appropriate information, instruction and training and the correct risk control measures are used. Advice on the types of work considered to be licensable and non-licensable, notifiable and non-notifiable is available on the HSE website - see 'key resources' section on page 12.

Asbestos management arrangements should ensure caretaking staff do not become involved with any minor works, such as erecting shelves, as the walls into which they might drill could be constructed from asbestos or contain products such as AIB or Asbestos Cement or have an Asbestos product concealed behind the visible wall covering. In addition, Caretakers should not undertake any work which leads to the disturbance of the fabric of the building, however minor, as this could lead to the inadvertent disturbance of ACMs e.g. asbestos-containing vinyl floor tiles and coverings.

For any working practices there needs to be robust signing in procedures, and clear management of contractors & sub-contractors working at the school. Where there are devolved budgets for school works, persons arranging building works or maintenance need to ensure that contractors are competent to undertake the work. It is advised that schools use the competency within the local authority to support this work.

All staff at school need to be advise of asbestos management and aware of current guidance, this includes both teaching and non-teaching staff, such as caretakers, cleaners, catering staff as well as supply teachers, temps, office staff, mid day supervisors, breakfast club staff, after school staff, governors and key holders. Asbestos management information should also be made available to other organisations that may share the school site, and also to those services that may need to visit the school, e.g. fire service.

5.1 Maintenance/small works under the control of the school/trust/Local Authority

The AMP should identify how any work which goes beyond normal daily activities will be managed to ensure that the risks associated with ACMs are controlled.

Before the start of reactive or planned work on any scale likely to disturb the fabric of the building (such as drilling) there should be suitable arrangements to review the Asbestos Register to assess whether the work is likely to disturb or pose a risk to ACMs identified or assumed to be present. Accidental overstrike onto adjacent ACMs should be considered. Where possible, this review should be undertaken well ahead of proposed work to ensure the implications of any ACMs are factored into the risk assessment for the task. Careful consideration needs to be given to assess whether the management survey provides sufficient information to undertake the work safely or whether a further survey is required.

Contractors' managers must be provided with relevant information at the earliest time ahead of the commencement of the work to allow them to assess the work implications of the ACMs. To avoid the risk of a breakdown in communications it is strongly recommended that, in its own interests, the school's nominated person should inform each site worker individually themselves each day to avoid costly disturbances.

For all works, the arrangements should ensure that all necessary safeguards have been followed before work commences. This should include validating that the necessary checks against the Asbestos Register have been made, the implications of the ACMs assessed and the work is suitably planned with the necessary working methods and safeguards agreed. Consideration should be given to control the work using a 'permit to work' or equivalent mechanism.

5.2 The need for additional survey information

Where the information contained within the Asbestos Register does not offer sufficient information to identify ACMs that may be affected by the work, or is inconclusive, a further deeper survey will be required.

[A 'management survey' will only cover the readily accessible areas. It may not identify all ACMs and will not positively identify those ACMs that are assumed as present or hidden ACMs].

This may extend to a targeted 'refurbishment and demolition survey', which is far more intrusive than a 'management survey'. It is unlikely that this can be undertaken in occupied areas. The findings from additional surveys should be used to update the asbestos assessments, Asbestos Register and AMPs and should be used to inform considerations for maintenance or planned work.

Schools should be familiar with their duties as a client under the Construction (Design and Management) Regulations 2015 (CDM 2015), which requires them to provide information to designers and builders at an early stage in respect of existing hazards including asbestos.

5.3 Ensuring the work can be undertaken safely

Where it is assessed that works will not be likely to disturb or damage ACMs, the proposed work method should be reviewed before starting to validate that the relevant enquiries have been made and controls are in place and followed. However, once authorized, it should proceed with caution, being alert to and prepared for the unexpected presence of ACMs. If further ACMs or suspect material is uncovered, the work should stop, the area made safe and the work reassessed before

continuing. Wherever possible, work should be undertaken in a segregated area or outside normal school hours. Post-work checks should be undertaken to ensure that no residual risks remain before the area is reoccupied.

Where it is identified that the proposed works will disturb ACMs, additional steps should be taken to assess the risks and identify the control measures to undertake the work in accordance with relevant HSE guidance. The work should be assessed to ascertain whether the “work with asbestos” is licensable work – i.e. can only be undertaken by a licensed contractor or needs to be notified as “notifiable non-licensable work” (NNLW). Where the work does not require a licence, it should be ensured that those undertaking the work have the necessary training, knowledge, experience and equipment to undertake the work and that the work is suitably planned. The proposed work method should be reviewed before starting to ensure that it addresses and controls foreseeable risks. The work should be undertaken in such a manner that it is segregated and, where necessary, sealed off from the school. Relevant post-work checks, including a formal clearance procedure (which depending on the scope of the work may include sampling), should be undertaken before the area can be confirmed as suitable for reoccupation.

The work activity should be monitored to ensure the controls are followed and additional precautions taken where the scope of the work is revised.

5.4 Larger construction works:

Where the work forms part of a construction project to be undertaken under the control of a Principal Contractor, all the relevant information held by the school should be provided ahead of the contract to be included in the considerations for the planning phase of the contract, under the Construction (Design and Management) Regulations 2015. The schools should secure assurances that the ACMs will be dealt with appropriately and that any work is suitably segregated from the activities of the school.

5.5 Waste Materials

Waste materials containing asbestos must be disposed of as hazardous waste. If the work is carried out by in-house staff you will be responsible for ensuring any waste is disposed of safely and to comply with the requirements of the Hazardous Waste Regulations 2005 (as amended 2009). If you have contracted the work out, disposal is the responsibility of the contractor, although you will have responsibility for obtaining a waste consignment note to confirm that the asbestos was appropriately disposed of.

Key Resources:

[Need building work done? A short guide for clients on the Construction \(Design and Management\) Regulations 2015](#)

[Advice on licensable work with asbestos](#)

[Advice on non-licensed work with asbestos](#)

[Information on disposing of asbestos waste](#)

6. Funding for the repair or maintenance of school buildings

The 21st Century Schools and Education Programme will see significant investment in our educational estate. This investment supports the rebuild and refurbishment of schools and colleges across Wales. It will focus on some of our poorest condition schools and colleges and will, therefore, include the removal or treatment of asbestos where appropriate.

Local authorities can use funds from the Welsh Government's Revenue Support Grant (RSG) to keep all their schools buildings maintained and in a good state of repair.

7. What to do if things go wrong

Schools should, have a written 'Emergency Procedure' in place, which outlines the actions to take in the event of unplanned disturbance or damage to asbestos. The HSE Guidance Asbestos Essentials EM1 provides full details. However, the actions should include:

- stopping any activity in the affected area immediately;
- removing everyone from the affected area;
- ensuring that staff and pupils are not able to access the area and do not remove any items including equipment, books or personal possessions from the area;
- getting advice from an asbestos expert regarding any necessary remedial action;
- preventing further access to the area until any necessary remedial action has been taken;
- arrangements for decontaminating any persons who been directly exposed to any dust and debris which may include asbestos fibres;
- arrangements for preventing the spread of any asbestos contamination from the affected area including on personal clothing.

Certain exposures to asbestos are reportable under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR). It is advised that schools contact their local authority and the HSE to discuss any incident and identify whether it is reportable.

Contractors carrying out work in the school should have procedures in place to deal with an unintended or unexpected release of asbestos. You should be advised of any such release so that appropriate measures, including those set out above, can be taken as necessary.

People who have been exposed to asbestos are understandably anxious about the possible effects on their health. Make sure that staff, pupils or their parents are given relevant information to understand the risks. If they are still concerned about exposure they should consult their GP and inform the local authority. Your school's AMP should detail the procedures for staff to follow in the event of an asbestos incident. You must communicate this clearly to all staff.

Key Resources

[HSE asbestos checklist](#)

[HSE managing asbestos in schools - frequently asked questions](#)

[HSE asbestos advice](#)

[HSE RIDDOR webpage](#)

[National Association of School Business Management Joint](#)

[Joint Union Asbestos Committee](#)

[United Kingdom Accreditation Service](#)

<http://www.hse.gov.uk/pubns/guidance/em1.pdf>

8. Information checklist

The table below serves as a checklist for information provided in this guidance. A more detailed version is also available from the [Health and Safety Executive \(HSE\)](#)

Information Checklist	Information Location
Are you aware who has the overall legal responsibility for the management of maintenance and repair of the school buildings (Who is the duty holder)?	
Do you understand the implications of asbestos in your school?	
Do you understand your responsibilities as duty holder?	
Is an Asbestos Management Plan (AMP) in place? Is there a plan in place in periodically review this information?	
Has a management survey been undertaken? Has the location of asbestos-containing minerals (ACM's) been documented?	
Do you know the types of ACM's documented and where they may be found?	
If ACMs have been identified, have you completed or contributed to an assessment for potential risk?	
Do you have a management plan detailing how to manage the risks from any ACM's at your school?	
Are precautions in place to ensure anyone who may disturb ACMs is provided with information about any asbestos present, and have these arrangements been tested? Are any in-house staff members, who may undertake maintenance work, adequately trained (Regulation 4)?	
Is there a process in place to regularly review your Asbestos Management Plan?	
Do you, and your appointed person in your absence, know what to do if things go wrong?	
Can you access your Asbestos Management Plan even if access to the building is restricted?	
Are there clear arrangements to monitor the condition of the ACMs?	
Have you provided appropriate training for those who may come into contact with ACMs?	
Have you provided appropriate training for those with specific asbestos management duties (to include the Appointed Person, The Deputy Appointed Person, those who may organise responsive maintenance work or minor projects, and those who may undertake condition inspections of ACMs as referred to within this Guidance Document)?	

9. Useful organisations

[Health and Safety Executive \(HSE\)](#)

[National Association of Headteachers \(NAHT\)](#)

[Association of School and College Leavers \(ASCL\) Cymru](#)

[Association of Teachers and Lecturers \(ATL\) Cymru - NEU](#)

[National Union of Teachers \(NUT\) – National Education Union \(NEU\)](#)

[NASUWT](#)

[UNISON Wales](#)

[UCAC](#)

[GMB](#)

[Unite the Union](#)

[Voice the Union](#)

Joint Union Asbestos Committee (JUAC)

[Trades Union Congress \(TUC\)](#)

[United Kingdom Accreditation Service \(UKAS\)](#)

[UK Asbestos Training Association \(UKATA\)](#)

[Asbestos Testing and Consultancy Association \(ATaC\)](#)

[Independent Asbestos Training Providers \(IATP\)](#)

[Mesothelioma UK Limited](#)

[McMillan Nurses](#)

[Cancer Research UK](#)

[Welsh Local Government Organisation](#)

Contact your local authority, property and education departments