



Asbestos POLICY

Policy Title

Table of Contents

| | |
|---|----|
| Section 1 – Policy wording | 1 |
| Section 2 – Policy and Procedural guides | 1 |
| Management Responsibility | 2 |
| Police and Crime Commissioner for Gloucestershire, Chief Executive (SRO for Estates) and the Head of Corporate Service..... | 2 |
| Estates Function controlled by the Estates and Support Services Manager | 2 |
| Premises Managers | 3 |
| Contractors | 3 |
| Communication Channels | 4 |
| Staff Training - General | 4 |
| Survey Programme - General | 5 |
| Central Records | 5 |
| On Site..... | 6 |
| Periodic Review..... | 7 |
| Ad-Hoc Review as a Consequence of Legislative Changes..... | 7 |
| Ad-Hoc Review as a Consequence of Incidents, Complaints, Corrective Action | 7 |
| Distribution | 8 |
| Feedback..... | 8 |
| Section 3 - Relevant Legislation: (Human rights/diversity/Health & Safety/any other specifics) | 13 |
| Section 4 - Related References: | 13 |
| Section 5 - Identification, Monitoring and Review | 13 |

Section 1 – Policy wording

The Police and Crime Commissioner and Chief Constable for Gloucestershire’s Policy with regard to Asbestos is to minimise the risk to any person working in, visiting, or carrying out maintenance in our buildings, and to provide guidelines for the safe management, removal and disposal of ‘Asbestos Containing Materials’, where necessary, in conjunction with current legislation and associated codes of practice.

This document sets out the policy and associated procedures for the safe management of Asbestos Containing Materials (ACM’s) in buildings under the control of the Police and Crime Commissioner for Gloucestershire, and has been constructed with regard to the key human rights principles of legal basis, legitimate aim, proportionality and non-discrimination. Practitioners are advised to ensure that the policy is applied in accordance with the same principles.

Section 2 – Policy and Procedural guides

To have specific lines of responsibility for the management of asbestos in buildings.

To have clear comprehensive procedures for the management of asbestos in buildings. This will include the following:

- Identification of **Asbestos Containing Materials (ACMs)**, monitoring of their condition, and the removal or repair where necessary.
- The planning and effective implementation of emergency procedures.



Asbestos POLICY



- The identification of and provision of information to all maintenance staff or contractors, contractors installing I.T. equipment and any other person whose work may involve the disturbance of ACMs.

To identify, where possible, the presence of ACMs in buildings and to carry out assessments to determine the risks presented by the ACMs.

To maintain up to date records of ACMs within the buildings. Records are to be kept centrally at Headquarters Estates and Support Service Department with written copies provided to each site as relevant.

To remove asbestos where it presents an unacceptable risk to any person.

To maintain any ACMs, which are not removed, in a safe condition so as to present minimum risk to building users.

To clearly mark ACMs in buildings.

To train staff and contractors, as appropriate, in matters relating to asbestos.

To only use Licensed Asbestos Removal Contractors (LARCs) who are audited and approved for asbestos removal work.

To use a laboratory to carry out audits, monitoring, air sampling and analysis that is accredited to ISO17025 – previously EN45001, that is - the laboratory has UKAS accreditation.

To carry out a periodic review of the policy and procedures to monitor their effectiveness and identify any areas where improvements are necessary.

To ensure that, where buildings are leased, landlords provide a comprehensive asbestos register or, for areas where the Police and Crime Commissioner is responsible, that a relevant survey is carried out.

Management Responsibility

Police and Crime Commissioner for Gloucestershire, Chief Executive (SRO for Estates) and the Chief Finance Officer

Policies relating to all maintenance in buildings used by Gloucestershire Constabulary.

Estates Function controlled by the Head of Estates and Support Services

Asbestos policy, strategy for implementation, resources allocation and monitoring.

Ascertaining whether asbestos is present in Constabulary premises (or assessing if asbestos containing materials (ACMs) are liable to be present) ascertaining its location and condition.

Implementation and management of survey/testing programmes including identification and organisation of any remedial works necessary; the maintenance and updating of Central survey records; issuing of and providing information for the updating of District and Site asbestos records.

Issuing and maintenance of up-to-date, relevant asbestos registers and marked site plans for routine maintenance and major works to both contractors and Project designers.



Asbestos POLICY

Issuing and maintenance of up-to-date, relevant asbestos registers and marked site plans for routine maintenance and major works to the representatives of any partner agencies sharing building accommodation maintained by the Constabulary.

Implementation of asbestos policies concerning management of asbestos within individual buildings.

Staff training (general)

Organisation of periodic inspections of identified ACMs in each building. To ensure periodic inspections and management priority risk assessments of ACM's identified in Type 2 survey asbestos registers are carried out.

Liaison with appropriate Asbestos Consultants and Licensed Asbestos Contractor (LAC) during both planned asbestos removal and emergency procedures. The placing of orders for such identified works and providing guidance to officers in charge of buildings as required.

The issue of up-to-date, relevant asbestos registers, records and marked site plans to the purchasers of any buildings disposed of by the Constabulary.

Issuing and maintenance of up-to-date, relevant asbestos registers and marked site plans to the landlords of any buildings leased by the Constabulary on request and on the termination of that lease.

The issue of up-to-date, relevant asbestos registers, records and marked site plans to the lessees of any buildings operated of by the Constabulary and the maintenance of said plans in the event of any works undertaken by the lessees.

Ensuring that any Permits to Work are prepared, as required, by competent individuals in liaison with contractors prior to and during works involving the management of asbestos.

Premises Managers

Defined at the person appointed to that role or the most senior member of staff at that location.

Maintenance and updating of survey records at each site.

Responsibility for ensuring that the Asbestos Register is readily available to contractors.

Responsible for raising technical queries with the Estates and Support Services Function on any aspect relating to ACMs in the building

Informing the Estates and Support Services Function of any proposed works in premises known to have asbestos present prior to the commencement of these works.

Contractors

Responsible for consulting the Asbestos Register prior to commencing any works on site and confirming that the appropriate information, instruction and training has been provided to their employee(s).



Asbestos POLICY



Responsible for informing the Officer in Charge of the building of any problems relating to the ACMs while working on the site and where relevant, ceasing works in appropriate circumstances.

Responsible for ensuring that ACMs are never used in building repairs or maintenance works.

Head of Estates and Support Services

Responsible for acquiring any existing Asbestos Registers or records of ACMs present on any site that is purchased or leased by the Office of the Police and Crime Commissioner for Gloucestershire and retained as appropriate. This post is also designated as a competent person under the legislation and professionally qualified to manage the control of asbestos in the workplace.

Project Managers or any person commissioning works in buildings

Responsible for consulting any existing Asbestos Registers or records of ACMs present on the site.

Responsible for making a judgement as to whether a Type 3 survey is required. Clarification with the Head of Estates and Support Services should be sought where necessary.

Responsible for contacting the Estates & Support Services function to commission any necessary survey works, completion of work permits and the submission of relevant documentation as appropriate.

Communication Channels

The arrangements for communication channels are as follows

- *The Head of Estates and Support Services , has overall control of all aspects of asbestos management*
- *The Head of Estates and Support Services will arrange for a member of the Estates & Support Services function to liaise, as and when necessary, with an approved Asbestos Consultant on aspects of the survey programme and aspects of asbestos removal and emergency procedures.*
- *Premises Managers of any building should liaise with the Head of Estates and Support Services to raise any technical queries and report any problems relating to ACMs in buildings under their control.*
- *Any person commissioning works must contact the Estates & Support Services function to obtain Asbestos Registers, arrange for further surveys to be carried out and identify any ACMs requiring removal prior to the works commencing.*

Staff Training - General

All staff directly involved in asbestos management should receive adequate training in:

- (i) The requirements of the relevant legislation and Approved Codes of Practice (ACOPS) especially the Control of Asbestos Regulations 2012 and Control of Pollution (Special Waste) Regulations
- (ii) Risk assessments and emergency procedures
- (iii) Records and information requirements for all maintenance and major works
- (iv) Contract management



Asbestos POLICY

All site managers and maintenance personnel should receive adequate training in asbestos awareness, risk assessments and emergency procedures. This will also include the completion of any appropriate e-learning packages. Operational staff are advised to consider the implications of working in environments where asbestos might be present.

All site supervisors for external routine maintenance contractors should have documentation to show they have undertaken asbestos awareness training and received appropriate instruction, information and training; updated as appropriate.

Survey Programme - General

All buildings will have a non-intrusive survey with sampling carried out in a planned programme by an independent laboratory accredited to ISO17025 (UKAS).

A report of the survey will be produced which will include an asbestos register and marked plan. Reports will be sent to the Estates & Support Services function from where they will be distributed to the individual sites. A copy of the report will also be retained within site files in the Estates function.

The management and prioritization of risk assessments resulting from surveys will be carried out by the Head of Estates and Support Services who will implement any necessary remedial works identified.

Periodic inspections of the ACMs identified in the asbestos registers are to be carried out by an approved Asbestos Consultant or competent qualified person employed by the Constabulary. The condition of the ACM should be noted and reported to the Estates & Support Services function, so that any necessary remedial works may be carried out. Survey records and asbestos registers should then be updated as necessary.

Where major works such as demolition or refurbishments, which may involve dismantling or demolition of elements of the building, are planned, an intrusive survey to identify all asbestos within the area to be disturbed is to be carried out. This survey work may only be carried out in an unoccupied building or section of building and includes areas such as sealed ducts, above suspended ceilings and areas within the structure of the building.

Surveys above suspended ceilings and in enclosed ducts must only be carried out by an Approved Asbestos Consultant under controlled conditions having due record for the relevant risk assessment, method statement and safe systems of work.

Maintenance of Records

Central Records

The central record for all asbestos information will be held by the Estates and Support Services function. These records will include:

- Results of all surveys
- Results of all sampling and testing



Asbestos POLICY



- Marked plans of the buildings, with high-lighted locations of ACMs
- Records of any asbestos removal works undertaken including air tests, waste carriage documentation, etc.
- Any accidental damage which may have caused inadvertent exposure to asbestos.

Asbestos inspection records are to be reviewed after 40 years. All updates will be made as an additional record and data must not be overwritten.

Asbestos Registers are to be reviewed 40 years after the date of the last entry.

Records of asbestos incidents are to be reviewed 30 years after the date of the event and can be disposed of 40 years after the date of the event.

Health surveillance records are to be retained for at least 40 years from the date of the last record.

On Site

A copy of the survey report, asbestos register and marked plans will be held by the Premises Manager and/or designated maintenance staff in each specific property. Additional survey reports, asbestos removal information etc. will be issued to the site as appropriate so that the records may be updated as necessary.

Labelling of Approved Asbestos Contractors

In addition to the written records on site all known ACMs will be labelled with a clearly visible asbestos warning label. Condition and presence of labels should be included in the periodic re-inspections of ACMs and repaired or replaced as necessary. All maintenance personnel and external contractors should be trained in the recognition of the chosen labelling system.

List of Approved Asbestos Contractors

When necessary, appropriate consultants shall be the contact for a list of approved licensed asbestos removal contractors.

Updating Asbestos Registers following Remedial Works

An approved Consultant will update the Asbestos Registers and forward to the Head of Estates and Support Services. The updated registers will be distributed to the relevant responsible persons.

Time Schedules for Asbestos Records

The requirements for retention of records are as follows:

| | |
|---|---|
| Asbestos Inspections (cf Control of Asbestos at Work Regulations) | Review 40 Years after issue |
| Asbestos Registers Statutory Instruments | Review 40 Years after date of last entry. |
| Asbestos Incidents. – Correspondence, reports and papers | Review 40 Years after date of event |



Asbestos POLICY



| | |
|---|---|
| Health Surveillance (including medical reports) | At least 40 Years after last record- or the age of 80 whichever is the longer |
|---|---|

Review of the Management of Asbestos Policy

Periodic Review

On a yearly basis the Asbestos Policy will be jointly reviewed by:

- The Head of Estates and Support Services and Estates & Support Services function representatives
- An approved Consultant where necessary

Any changes to the Asbestos Policy document that result from the yearly review will be actioned by an approved Consultant.

An Asbestos management plan and review is carried out annual with any remediation work noted and progressed. The Management Plan and actions will be recorded on the Estates Management System.

Any changes to the procedures for dealing with asbestos that result from the yearly review will be actioned by the Head of Estates and Support Services.

Ad-Hoc Review as a Consequence of Legislative Changes

Following a report it is the responsibility of the Head of Estates and Support Services, or their nominated deputy to act upon legislative changes relating to the management of asbestos within buildings. .

Changes to legislation that may impact upon the accuracy and relevance of the current Asbestos Policy will result in a joint review of the policy by the

- Head of Estates and Support Services
- An approved Consultant where appropriate

Any changes to the procedures for dealing with asbestos that result from the ad-hoc review will be actioned by the Head of Estates and Support Services.

Ad-Hoc Review as a Consequence of Incidents, Complaints, Corrective Action

It is the responsibility of the Head of Estates and Support Services to monitor and act upon incidents, complaints, and corrective action relating to the management of asbestos within buildings that will have an impact upon the effectiveness of the Asbestos Policy.

Any changes to the Asbestos Policy document that result from the ad-hoc review will be actioned by the Estates and Support Services Team and arrange for publication as appropriate.



Asbestos POLICY



Any changes to the procedures for dealing with asbestos that result from the ad-hoc review will be actioned by the Head of Estates and Support Services.

Circulation of the Management of Asbestos Policy

Distribution

A master copy of the Asbestos Policy will be held by the Head Estates and Support Services

An electronic circulation copy will be made available to all staff on the Gloucestershire Constabulary intranet. The onus will then be on individuals to download their own hard copy.

The current Repair and Maintenance Consultants will be supplied with the latest copies of the Policy.

The 'Policy Statement' will be published on the Gloucestershire Constabulary 'Freedom of Information Act – Publication Scheme' Internet web site.

Feedback

Feedback relating to this policy can be made by telephone, in writing, or by e-mail to the Estates function.



Asbestos POLICY

Containment and Monitoring requirements

| Nature of asbestos works | Enclosure required? | Site inspection required? | Type of air monitoring required | Any other requirements |
|---|----------------------------|----------------------------------|--|-------------------------------------|
| Removal or encapsulation of internal and external pipe lagging | Yes | Yes | Clearance | Adequate notice for site attendance |
| Removal or brush painting of internal or external AIB e.g. window infill & panels | Yes | Yes | Clearance | Adequate notice for site attendance |
| Removal or encapsulation of internal and external sprayed coatings | Yes | Yes | Clearance | Adequate notice for site attendance |
| Removal or brush painting of internal and external exposed paper products e.g. lined panels | Yes | Yes | Clearance | Adequate notice for site attendance |
| Environmental cleans of areas contaminated with non cement debris | Yes | Yes | Clearance | Adequate notice for site attendance |
| Opening of internal and external floor ducts | Yes | Yes | Clearance only if asbestos found | Adequate notice for site attendance |
| Removal of internal and external friable ropes and gaskets e.g. oven seals | Yes | Yes | Clearance | Adequate notice for site attendance |
| Removal of interior textured coatings e.g. artex | Yes | Yes | Clearance | Adequate notice for site attendance |



Asbestos POLICY



| | | | | |
|---|----|----|--|-------------------------------------|
| Removal intact of internal cement products e.g. blackboards & flue pipes | No | No | Background during works | Adequate notice for site attendance |
| Removal of any external cement products e.g. roof sheets, gutters/ down pipes | No | No | Visual inspection may be advisable depending on site | Adequate notice for site attendance |



Asbestos POLICY



Legislative Requirements and Relevant Legislation

Health and Safety at Work Act 1974

Environment Protection Act 1990

Environment Act 1995

Water Industry Act 1991

Pollution Prevention and Control Act 1999

Control of Asbestos at Work Regulations 2002

Control of Asbestos Regulations 2012

Control of Asbestos Regulations 2006

Asbestos (Licensing) Regulations 1983

Asbestos (Licensing) (Amendment) Regulations 1998

Asbestos Products (Safety) Regulations 1985

Asbestos (Prohibitions) Regulations 1992

Asbestos (Prohibitions) (Amendment) Regulations 1999

Asbestos (Prohibitions) (Amendment) Regulations 2003

Carriage of Dangerous Goods (Classification, Packaging and Labelling) and Use of Transportable Pressure Receptacles Regulations 1996

Carriage of Dangerous Goods by Road Regulations 1996

Construction (Design and Management) Regulations 2007

Construction (Health, Safety and Welfare) Regulations 1996

Controlled Waste (Registration of Carriers and Seizure of Vehicles) Regulations 1991

Control of Asbestos in the Air Regulations 1990

Control of Asbestos Regulations 2012

Control of Substances Hazardous to Health Regulations 2002

Environmental Protection (Duty of Care) Regulations 1991

Health and Safety (Consultation with Employees) Regulations 1996

Health and Safety (Fees) Regulations 2006

Health and Safety (Safety Signs and Signals) Regulations 1996

Management of Asbestos in Non-domestic Premises. Approved Code of Practice L127

Management of Health and Safety at Work Regulations 1999

Manual Handling Operations Regulations 1992

Personal Protective Equipment at Work Regulations 1992

Provision and Use of Work Equipment Regulations 1998

R Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995

S Special Waste Regulations 1996

The Management of Asbestos in Non-domestic premises. Control of Asbestos at Work Regulations Approved Code of Practise L12 Waste Management Licensing Regulations 1994

Work With Asbestos Insulation, Asbestos Coating and Asbestos Insulation Board, Approved Code of Practise Fourth Edition L28

Work With Asbestos Which Does Not Normally Require a Licence, Approved Code of Practice Fourth Edition L27

Workplace (Health, Safety and Welfare) Regulations 1992



Asbestos POLICY

Definitions

- 1) **ACMs** – Materials containing one or more of the five types of asbestos, i.e. Crocidolite, Amosite, Anthophyllite, Actinolite, Tremolite and Chrysotile.
- 2) **BS EN ISO/IEC 17025:2000** General requirements for the competence of testing and calibration laboratories British Standards Institute.
- 3) **I.T. staff** – Information technology personnel who have the authority to commission the installation or repair of cabling for computers and communications.
- 4) **Asbestos Register** – A register of all of the known ACMs in a building, including the type of asbestos, product, location, extent or quantity, any surface treatment and the amount of damage or deterioration.
- 5) **Type 2 survey** – *Standard sampling, identification and assessment survey*. This is a survey to locate, as far as reasonably practicable, the presence and extent of any suspect ACMs in a building, to assess their condition and to take representative samples and analyse them for the presence of asbestos. If a material sampled is found to contain asbestos other similar homogenous materials can be strongly presumed to contain asbestos. Where it is impractical to access areas these areas must be presumed to contain asbestos.
- 6) **Type 3 surveys** – *Full access sampling and identification survey (pre-demolition/major refurbishment surveys)*.

This type of survey is used to locate and describe, as far as reasonably practicable, all ACMs in a building and may involve destructive inspection, as necessary to gain access to all areas. A full sampling programme is undertaken to identify possible ACMs and estimates of the volume or surface area of ACMs made.

7) **Material risk assessment**

To control and manage the risk from identified and presumed ACMs the potential for fibre release of each ACM found is to be assessed. This is done with the aid of a material assessment algorithm which uses the four parameters of product type, extent of damage or deterioration, surface treatment and asbestos type to determine the amount of fibre release from an ACM when subject to a standard disturbance.

8) **Management priority risk assessment**

It does not automatically follow that those materials assigned the highest scores in the material assessment will be the materials that should be given priority for remedial action. Management priority must be determined by carrying out a risk assessment which takes into account the following factors:

- The location of the material
- Its extent
- The use to which the location is put
- The occupancy of the area
- Activities carried out in the area
- The likelihood/frequency with which maintenance activities are to take place



Asbestos POLICY



9) Licensed asbestos contractor - LAC

A contractor that holds a license, issued by the Health and Safety Executive, to work with asbestos insulation, asbestos coating and asbestos insulation board, as defined in the Asbestos (Licensing) Regulations 1983.

10) Four stage Clearance

The assessment required following works with ACMs covered by the Approved Code of Practise - Work with asbestos insulation, asbestos coating and asbestos insulation board 2002 to determine whether the areas concerned are thoroughly clean and hence fit to be returned to normal occupation. The assessment is split into the following four stages:

- a. Preliminary check of site condition and job completeness.
- b. Thorough visual inspection.
- c. Clearance air monitoring.
- d. Final assessment post enclosure/work area dismantling.

11) Certificate of reoccupation

Following satisfactory results for all four stages of the clearance process a certificate of reoccupation is issued which state that the areas concerned are clean and cleared for normal occupation.

Section 3 - Relevant Legislation: (*Human rights/diversity/Health & Safety/any other specifics*)

List/link any relevant papers to be considered – Free text

Section 4 - Related References:

List/link any relevant papers to be considered – Free text

Section 5 - Identification, Monitoring and Review

The policy should enable consistent and effective decision making. Where operational or managerial circumstances require any decision making that would adversely affect adherence to the policy or procedure, in line with the 'Statement of Intent' of the constabulary and the police service 'Code of Ethics', if an officer/ police staff member believes that they need to make a decision that steps outside of policy and procedure they should do so, provided that:

- the officer/ police staff member raises the matter at the earliest opportunity (and ideally before any such decision is made) with their line manager declaring their intended (or actual) course of action if notification is made after the decision is taken,
- produces, in a timely manner, a signed and dated written explanation of why it is/ was deemed necessary to step outside of policy and procedure, and
- maintain an adequate record of this written rationale for audit purposes appropriate to the circumstances/ contravention



Asbestos POLICY



| | | | |
|---|----------------------|---|---|
| Security Marking: | | NOT PROTECTIVELY MARKED | |
| Document Title: POLICY | | | |
| Asbestos Policy | | | |
| Type | | URN | Strategic Board |
| Policy & Procedure | | | Andy Buxcey |
| Version | Date | Changes (ensure public copy amended and uploaded to external website) | Complied with Policy Guidance ✓ |
| | 9/11/2016 | See previous versions for past changes | |
| V7.4 V7.5 | 7/11/2016 12/9/17 | Vicki Heselton/ Andy Buxcey Vicki Heselton - change in title and ACC Thompson replacing Hannah Young as the corporate lead | ✓ |
| | 21/2/2018 | Added generic decision making wording as requested by the CC | |
| V 7.6 | 11/02/2020 | Reviewed and updated by Head of Estates and Support Services | |
| V7.7 | 19/7/21 | Reviewed and updated by Head of Estates and Support Services – change to title in main body | |
| Next Document Review Date: 19/7/22 | | | |
| EIA | | EIA Sign Off | EIA Review |
| LOW | | | |
| SIA | | SIA Sign Off | SIA Review |
| | | | |
| <i>This version will be placed on the public domain website</i> | | | |
| If this version cannot be placed on the public domain website, provide reason and relevant COG authority | | | |

Previous policies can be found with the continuous improvement team.