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The Highland Council

Management of Asbestos

Arrangements and Procedures

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SUPERSEDED DOCUMENTS

The following items are superseded by this document; they should be withdrawn from current use and destroyed or retained as per their retention requirements.

REFERENCE	DATE	TITLE	REVISION
1	08/05/2018	Arrangements and Procedures for Asbestos Management	V7-5

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GLOSSARY & ABBREVIATIONS

TERM	DEFINITION
ACM	Asbestos-containing material
AIB	Asbestos Insulating Board
AMP	Asbestos Management Plan
ARCA	Asbestos Removal Contractors Association
CAD	Computer Aided Design
CAR (2012)	Control of Asbestos Regulations 2012
CDM 2015	Construction (Design and Management) Regulations 2015
Expose	Refers to exposure to airborne asbestos fibres
f/ml	Fibres per millilitre of air
IWMS	Integrated Workplace Management System
LARC	Licensed Asbestos Removal Contractor
MAS	Material Assessment Score
NLW	Non-Licensed Works
NNLW	Notifiable Non-Licensed Works
PACM	Presumed Asbestos-containing material
PoW	Plan of Work
RAMS	Risk Assessment and Method Statement

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1.0 Introduction

1.1 This document takes forward the policy statement contained within The Highland Council's general statement of Health, Safety and Wellbeing Policy by setting out the arrangements to implement the policy in relation to asbestos management.

1.2 The arrangements for asbestos management cover:

- Roles and responsibilities with reference to asbestos to ensure that they are clearly defined
- Emergency procedures for premises staff that are documented in section 5 of this document.

1.3 The arrangements will ensure:

- a) The Highland Council complies with the Control of Asbestos Regulations 2012, in particular Regulation 4 the Duty to manage asbestos in non- domestic premises. Regulation 4 Duty to manage asbestos in non-domestic premises does apply to common parts of premises, including housing developments and blocks of flats, but does not place any direct duties on landlords in respect of individual houses or flats. However, landlords do have to meet the requirements of the Civic Government (Scotland) Act 1982.
- b) That suitable training is available to staff members dealing directly or indirectly with asbestos. The arrangements will be supported by the allocation of appropriate resources to meet requirements.

1.4 The arrangements are aimed at ensuring provision and maintenance of a working environment for employees that is, as far as is reasonably practicable, safe without risks to health and adequate as regards facilities and arrangements for their welfare at work. It should be read and implemented in conjunction with the Corporate Occupational Health, Safety and Wellbeing policy.

2.0 Legal Background

2.1 The Health and Safety at Work etc Act 1974 places a duty on employers to “ensure, so far as is reasonably practicable, the health, safety and welfare at work of all his employees”. It also requires the employer to “conduct his undertaking in such a way so as to ensure, so far as reasonably practicable, that persons not in his employment who may be affected thereby, are not thereby exposed to risk to their health or safety”.

2.2 The Management of Health and Safety at Work Regulations 1999 further expands this and links in with the Control of Asbestos 2012 to place duties on employers to:

1. Identify, assess and record risks
2. Ensure controls are in place
3. Monitor/review protective/preventative measures/systems in-place.

Highland Council recognises that it has a duty under Regulation 4 of the Control of Asbestos Regulations 2012 to locate, assess, record, manage, and monitor the asbestos-containing material in those premises which it has the maintenance and repair responsibility of non-domestic premises and common parts of domestic premises.

2.3 All works must be carried out in strict accordance with Control of Asbestos Regulations 2012 and the following documentation:

1. Managing and working with asbestos Control of Asbestos Regulations 2012 Approved Code of Practice and guidance L143
2. A comprehensive guide to managing asbestos in premises HSG227
3. Asbestos: The Licensed contractors' guide HGS247
4. Asbestos: The analysts' guide for sampling, analysis and clearance procedures HSG248 (second edition)
5. Asbestos: The survey guide HSG264
6. Asbestos essentials: A task manual for building, maintenance and allied trades on non-licensed asbestos work HSG210 (Second edition)
7. A short guide to managing asbestos in premises Leaflet INDG223 (rev5) HSE Books 2009 ISBN 978 0 7176 6375 0.

3.0 Roles and Responsibilities

3.1 These arrangements detail the delegations that have been made to cover roles and responsibilities for asbestos management within non-domestic premises and common areas within domestic premises.

3.2 Each Service is responsible for the identification of personnel to be designated as the Responsible Person (in relation to each property). For non-domestic properties this role shall be undertaken by the Responsible Premises Officer (RPO). Each Head of Service is responsible for ensuring that an RPO is appointed for each of their properties.

3.3 Management of Asbestos within Highland Council Properties

3.3.1 The Chief Executive of the Highland Council is the Landlord of council owned and occupied non-domestic and domestic dwellings including common areas of domestic premises and retains the ultimate responsibility for ensuring the safety of employees, occupants and tenants in properties under their control.

3.3.2 Table 1 overleaf is taken from L143 Managing and working with asbestos and identifies the arrangements and how responsibilities may be allocated or shared under the regulations.

3.3.3 Table 1 – Responsibilities for Asbestos

Responsibility for premises	Who has the duty to manage under regulation 4?	Responsibilities under The Highland Council
The owner has sole responsibility for the premises or has sole responsibility for the common parts of multi-occupied buildings	The owner	Chief Executive as Landlord delegated to the Executive Chief Officer Property & Housing as the Corporate Property Officer for non-housing property and for common parts of domestic property
Under a tenancy agreement or contract, tenants (including employers or occupiers) are responsible for alterations, repairs and maintenance	The tenant, or tenants, in multi-occupancy premises	Lessee or occupier (e.g. where a full repair and maintenance lease is in place)
Under a tenancy agreement or contract, the owner keeps responsibility for maintenance and repairs, and the owner has control of access by maintenance workers into the building	The owner	Chief Executive as Landlord delegated to the Executive Chief Officer Property & Housing
Under a tenancy agreement or contract, responsibility is shared between several people, e.g. owners, sub-lessors, occupiers and employers.	Each party — for those parts of the premises for which they have maintenance responsibilities note that employers occupying the premises also have a general duty of co-operation to comply with the requirement of any health and safety regulations under regulation 11 of the Management of Health and Safety at Work Regulations 1999	Chief Executive as Landlord delegated to the Executive Chief Officer Property & Housing as the Corporate Property Officer for non-housing property and for common parts of domestic property
If an owner/leaseholder uses a managing agent	The owner The managing agent would act on behalf of the owner but does not assume the owner's duties in law. The ultimate responsibility remains with the owner	Chief Executive as Landlord delegated to the Executive Chief Officer Property & Housing
There is no tenancy agreement or contract	The person in control of the premises	Chief Executive as Landlord delegated to the Executive Chief Officer of the Service occupying the property
The premises are unoccupied	The person in control of the premises	Chief Executive as Landlord delegated to the Executive Chief Officer of the Service occupying the property

3.3.4 The Asbestos Safety Management System set out in this document has been prepared on behalf of the Chief Executive as Landlord by the Executive Chief Officer Property & Housing as the Corporate Property Officer to cover arrangements for both domestic and non-domestic premises. This will provide a coordinated approach to ensure management of asbestos within Highland Council premises.

3.3.5 The Chief Executive is ultimately responsible for ensuring the health, safety and welfare of staff, visitors, tenants and other building occupiers.

3.4 For Non-Domestic Properties

3.4.1 The Executive Chief Officer Property & Housing is responsible for establishing a Corporate Property Safety Management System to monitor and ensure that property related statutory inspections are carried out in respect of all Highland Council occupied and owned premises. This responsibility includes inspections in relation to asbestos management.

3.4.2 The Executive Chief Officer Property & Housing has responsibilities for the Property & Housing Service to ensure that the requirements for asbestos are met.

3.4.3 The Executive Chief Officer Property & Housing is accountable for ownership of Property Management Policy and ensuring sufficient resources are available for policy implementation, monitoring and review of its effectiveness.

3.4.4 The Head of Property and Facilities Management is accountable for appointing an appropriate responsible person and ensuring preparation and implementation of Property Policy, associated Risk Management System, procedures and training. The Head of Property and Facilities Management ensures that the responsibilities for non-domestic asbestos management are met and for regular liaison with the Head of Housing and Building Maintenance in relation to arrangements for asbestos management in common areas and the domestic property portfolio.

3.4.5 The Head of Property and Facilities Management will ensure that suitable and sufficient training is provided to all relevant staff.

3.4.6 The Head of Property and Facilities Management shall ensure that all asbestos works are carried out in accordance with statutory legislation including:

1. Arrangements to monitor the implementation of asbestos risk controls
2. Incidents or reported noncompliance relating to asbestos are investigated in conjunction with the Asbestos Safety Group and the Occupational Health Safety and Wellbeing Manager, with findings reported to the Head of Property and Facilities Management for review.

3.4.7 The Head of Property and Facilities Management shall ensure that risk controls for asbestos management are monitored on a regular basis

3.4.8 The Service Lead – Corporate Property is the Responsible Person and will ensure an asbestos safety management system is in place that safeguards the Highland Council's legal obligations under the Control of Asbestos Regulations 2012.

3.4.9 The Service Lead – Corporate Property is responsible for arranging, developing and implementing the monitoring of the Asbestos Safety Management System including change controls for all Highland Council

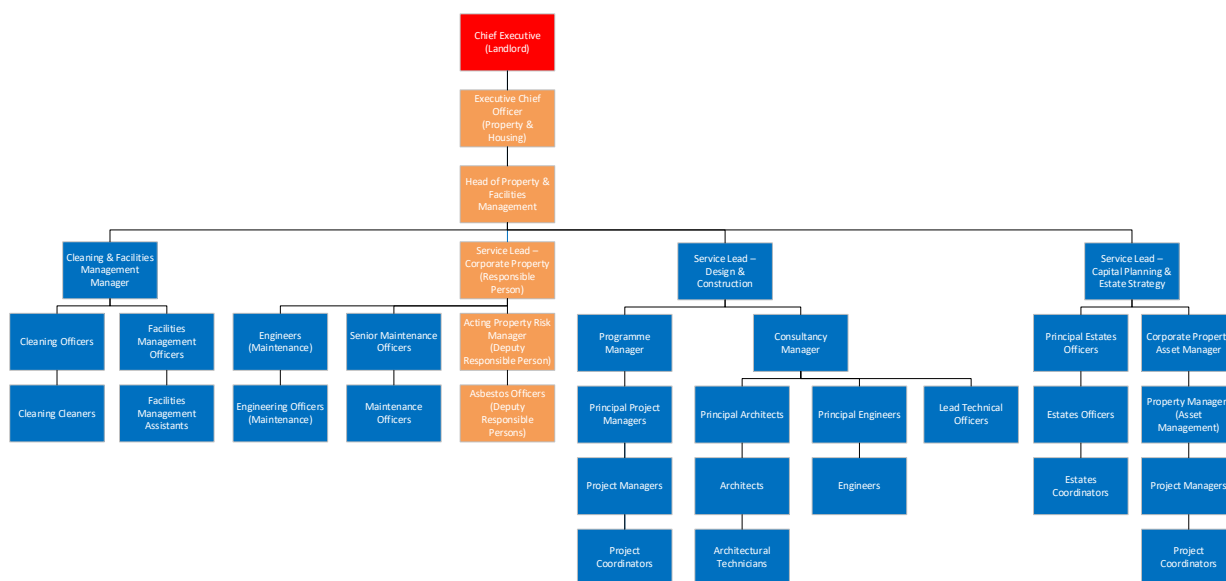
owned and occupied property systems to cover supervision responsibilities for related maintenance, operational and construction work procedures

- 3.4.10 The Service Lead – Corporate Property is accountable for appointing the Deputy Responsible Person(s), for asbestos and managing the budget for Property Management Systems and strategic asset management works.
- 3.4.11 The Service Lead – Corporate Property is responsible for coordinating resources for maintenance related works.
- 3.4.12 The Service Lead – Corporate Property will act as Chair of the Asbestos Safety Group.
- 3.4.13 The Asbestos Officers are the Depute Responsible Person and shall ensure that suitably qualified and competent staff are appointed to survey and remove asbestos and will ensure that appropriate cover for leave is provided.
- 3.4.14 The Asbestos Officers shall manage, monitor and organise inspections of the non-domestic portfolio and ensure re-inspections are undertaken within the required timescale, on behalf of the Highland Council as an employer and landlord and acts as a point of contact for any Highland Council staff for asbestos related technical advice.
- 3.4.15 The Service Lead – Design & Construction will ensure suitably qualified staff are involved with design, management, installation, and delivery of capital funded projects (as applicable to each team) that either directly or indirectly have the potential to affect asbestos within buildings.
- 3.4.16 CDM Officers and Contract Administrators ensure that the required information in relation to asbestos and any associated certification is contained within the project Health and Safety File.
- 3.4.17 The Senior Maintenance Officer is responsible for implementation and coordination of maintenance works for non-domestic property maintenance. This should be notified to the Asbestos Officers.
- 3.4.18 The Maintenance Officer(s) is responsible for ensuring maintenance works are completed in compliance with all relevant legislation, guidance, and Highland Council policies. Advice is available from the Asbestos Officers.
- 3.4.19 The Principal Project Managers, Project Managers, Project Coordinators, Principal Architects, Principal Engineer, Architects, Engineers, Engineering Officers, Architectural Technicians, and design discipline Graduate Officers are responsible for the design and delivery of Capital Works projects. The Project Manager is responsible for ensuring that no asbestos is disturbed during projects. Advice is available from the Asbestos Officers.
- 3.4.20 The Competent Person(s) - Appointed Contractor(s) (Approved Status) is responsible for carrying out remedial works, maintenance or monitoring checks in accordance with Highland Council Policies and instructions from Maintenance Officers / Contract Administrators / Engineer Mechanical (Maintenance).
- 3.4.21 The Responsible Premises Officer(s) (RPO) is responsible for carrying out certain routine tasks as required by the Highland Council Policy (e.g. Emergency Procedure). Any incidences should be reported to the Maintenance Officer who should update the Contract Administrator for any works and the Asbestos Officer(s).
- 3.4.22 In schools and properties covered by Facilities Management The Cleaning & FM Manager, Facilities Management Team Leader(s), Facilities Assistant(s), Caretaker(s), Cleaning personnel is responsible for being aware of the Asbestos Management Plan and assist in informing the RPO of room change/activity that may impact on the plan.

3.4.23 The Monitoring Inspector is responsible for recording the status of property-related statutory compliance checks.

3.4.24 The Occupational Health Safety and Wellbeing Manager will investigate any asbestos related incidences or reported non-compliances with the Asbestos Safety Group and advise on occupational health, safety and wellbeing issues.

3.5 Overview of the Property & FM Service Delegated Responsibilities for Asbestos Management



3.6 For Domestic Properties

3.6.1 The Executive Chief Officer Property & Housing shall ensure the asbestos register for all social housing is suitable and up to date. Technical assistance and advice can be sought from the Property and Facilities Management Team.

3.6.2 The Head of Housing and Building Maintenance will ensure sufficient funding and resources are allocated to safeguard the tenants within council social housing and employees involved in housing related maintenance activities. This is supported by Housing Repairs Managers in the North and South of the estate to confirm that asbestos surveys in domestic properties and common areas of flatted dwellings are carried out in accordance with statutory legislation.

3.6.3 The Head of Housing and Building Maintenance shall ensure that risk controls for asbestos management are monitored on a regular basis and any instances of non-compliance are investigated in conjunction with the Health, Safety and Wellbeing Manager.

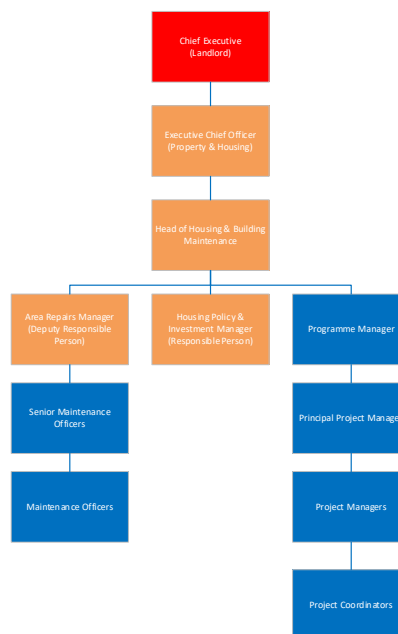
3.6.4 The Head of Housing and Building Maintenance will ensure that suitable and sufficient training is provided to all relevant staff.

3.6.5 The Housing Policy and Investment Manager is the Responsible Person, responsible for arranging development, implementation and monitoring of asbestos risk management system including change controls for all Highland

Council owned and occupied domestic property systems to cover supervision responsibilities for related maintenance, operational and design procedures. The Housing Policy and Investment Manager is accountable for appointing Deputy Responsible Person(s), Authorised Persons and managing the budget for Housing Management systems as they relate to Housing Revenue account works and coordination of resources for housing maintenance related works.

- 3.6.6 The Area Repairs Manager(s) is the Deputy Responsible Person and has responsibility for the implementation of housing operational and maintenance policy and procedures, for asbestos management and ensuring that the system is being implemented.
- 3.6.7 The Area Repairs Manager(s) shall ensure that suitably qualified and competent staff are appointed to manage and monitor maintenance in domestic properties and will ensure that appropriate cover for leave is provided.
- 3.6.8 The Senior Housing Maintenance Officer(s) is responsible for implementation and coordination of maintenance works for domestic property maintenance.
- 3.6.9 The Housing Maintenance Officer(s) is responsible for ensuring maintenance works are completed in compliance with all relevant legislation, guidance and Highland Council policies.
- 3.6.10 Competent Persons - Appointed Contractors (Approved Status) are responsible for carrying out remedial works, maintenance or monitoring checks in accordance with Highland Council Policies.
- 3.6.11 The Tenant Services Officer, Tenant Participation Officer(s), (Warden(s) etc.) is responsible for carrying out certain routine tasks as required by the Highland Council Policy (e.g. Emergency Procedure).
- 3.6.12 The Occupational Health Safety and Wellbeing Manager will investigate any asbestos related incidences or reported non-compliances with the Asbestos Safety Group.
- 3.6.13 The Corporate Health and Safety Advisor is responsible for advising on occupational health, safety and wellbeing matters.

3.7 Overview of the Housing Service Delegated Responsibilities for Asbestos Management



4.0 Asbestos Safety Management System

4.1 The Head of Property and Facilities Management has made the following arrangement to ensure that the Highland Council's Asbestos Safety Management System complies with the Control of Asbestos Regulation 2012.

4.2 Main points

4.2.1 Unless and until the asbestos status of a building / area is known and information can be made available to employees and contractors, Duty Holders as defined in section 3 of these arrangements, must put measures in place to prevent disturbance to possible asbestos-containing material.

4.2.2 The most effective way to do this is to prevent work which will disturb the fabric of the building until the presence or absence of asbestos-containing material has been established (Management / Refurbishment / Demolition Survey / Sampling) and any necessary precautionary measures can be taken.

4.2.3 In order to obtain information on the location, extent and condition of asbestos-containing material, steps have been taken to have all properties built or re-furbished prior to the year 2000 surveyed to an asbestos management survey standard (as defined in HSE Guidance, HSG 264). Properties surveyed should be checked in the CONCERTO system.

4.2.4 The RPO will arrange for Management Survey(s) through the Maintenance Officer or Asbestos Officer of their designated buildings where partial or no information on asbestos-containing material exists.

4.2.5 The Project Manager (for capital projects) or Maintenance Officer (for revenue works) should ensure that wherever refurbishment or demolition works are to take place, a Refurbishment / Demolition Survey must be

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carried out prior to commencement of such works and to ensure that this information is communicated to relevant designers and contractors to inform tenders in Pre-construction Information and Construction Phase Plans. Consideration should be taken into account that works programmes will be determined by the results of this survey. Arrangements for procurement of asbestos surveys are contained and documented in the separate Project Procedure – see section 4.6 Project Procedures – Asbestos related works.

4.2.6 Surveys must be undertaken by an individual or organisation with:

- Adequate training and experience in such work.
- Demonstrate independence, impartiality and integrity.
- UKAS accredited to ISO17020 or have an equivalent quality management system.
- Ensure that any survey is carried out in accordance with HSG264 Asbestos: The survey guide and that the report reflects the guidance set down in HSG264.
- Presume that asbestos exists in those parts of the building which were not accessible to the surveyor unless there is strong evidence from plans, specifications or other records that it does not.

4.2.7 Asbestos surveys carried out by in-house resources are covered by a separate document; Quality Manual and Procedures for Asbestos Surveying.

4.3 Surveys

4.3.1 The Highland Council will follow HSE's HSG264 Asbestos: The Survey Guide (latest edition), to carry out surveys on-site. The two types of survey are:

1. Management Asbestos Survey
2. Refurbishment and Demolition Asbestos Survey.

4.3.2 A Management survey is the standard type of survey required for the normal occupation and use of a facility/building to ensure continued management of Asbestos-containing material in-situ. Its purpose is to locate, as far as reasonably practicable, the presence and extent of any suspect asbestos-containing material which could be damaged or disturbed during normal occupancy, including foreseeable maintenance and installation, and to assess their condition.

4.3.3 A Refurbishment and Demolition Survey will be necessary when the building (or part of it) is to be upgraded, refurbished, or demolished and must be carried out prior to works commencing. This type of survey is used to locate and describe, as far as practicable, all asbestos-containing material in the area where the refurbishment work will take place or the whole facility/building if demolition is planned.

4.4 Re-inspections

4.4.1 Any changes identified during the re-inspection (e.g. required actions) must be recorded on the appropriate asbestos register on CONCERTO. Any actions arising from the re-inspections are dealt with by the Asbestos Officer.

4.4.2 Interim control measures may be required until a more permanent solution (e.g. removal or repair) can be implemented. These actions must be addressed/ closed-out within a reasonable time scale.

4.4.3 Changes to the condition of asbestos-containing material / presumed asbestos-containing material may require the RPO to update staff, premises occupiers and users of the facility to reflect asbestos warning signs, isolation

barriers, notifications to employees, etc. The Asbestos Officers will advise / liaise with RPOs following re-inspections to communicate any changes / actions required.

4.5 Asbestos Management Plan

4.5.1 The Highland Council has an Asbestos Management Plan which is monitored and reviewed on a twelve monthly basis, unless there is reason to believe circumstances have changed e.g. material friability and the plan and drawings will be updated accordingly.

4.5.2 The Asbestos Management Plan consists of:

- Asbestos Register and site plan stored within the CONCERTO asset management system
- Measures for managing the risk, recommended action section updated on re-inspection

4.5.3 The Asbestos Management Plan is updated within CONCERTO following re-inspection with material condition changes; any updated test results (e.g. where a presumption is confirmed via testing as containing asbestos or not); and with any removed asbestos-containing materials.

4.5.4 An Asbestos Brief is prepared by Asbestos Officers to address required action to improve condition (e.g. via encapsulation) or to remove asbestos-containing materials as recommended depending on the risk that they present.

4.5.5 Arrangements for providing information about the location and condition of asbestos-containing materials to anyone who is likely to disturb them and to the emergency services are available via the council's website www.highland.gov.uk.

4.6 Access for Contractors, Consultants and Emergency service providers

4.6.1 The following is an extract from the council web site to inform contractors of access arrangements to the on-line CONCERTO system for Asbestos Management Plans:-

We need contractors to make sure that all of their operatives have received the necessary asbestos awareness training consistent with section 10 of the Control of Asbestos Regulations 2012. Contractors will have to produce evidence of such training when attending any of our properties.

Asbestos information:

Access to information on asbestos items in Highland Council properties is available to contractors and consultants working on behalf of Highland Council via an online portal called CONCERTO.

To request access to the CONCERTO portal, email property.systems.support@highland.gov.uk with;


- your company name
- a list of employee names
- employee email addresses
- contact numbers of employees within your organisation that require access.

These employees will then receive an email with their login details, which also includes instructions on how to access the asbestos information.

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Please contact property.systems.support@highland.gov.uk if you need support using the portal.

4.6.2 Asbestos Management Plans are kept under review and monitored by Asbestos Officers.

4.7 Asbestos Register

4.7.1 The asbestos register for each non-domestic premise is stored on CONCERTO and is a fundamental part of the Asbestos Management Plan and forms part of a Health and Safety File. Any updates required to the Asbestos Register should be notified to the Asbestos Officer.

4.7.2 Amendments to the asbestos register/site plan will occur when:

- the presence of asbestos is confirmed or refuted for any presumed asbestos-containing material through bulk sampling;
- additional asbestos-containing material, or presumed asbestos-containing materials, are identified during asbestos surveys;
- additional asbestos-containing materials are identified through bulk sampling;
- changes in the condition / surface treatment of an asbestos-containing material identified during a re-inspection;
- asbestos-containing materials are removed during licensed or non-licensed works;
- relocation of plant or equipment with asbestos-containing material / presumed Asbestos-containing material.

4.8 Recording the location and condition of asbestos-containing materials

4.8.1 Material that is known to, or presumed to, contain asbestos should be recorded on either a Management survey or Refurbishment and Demolition survey and be noted on an asbestos register and site drawing / plan to enable another person to identify it. A survey report which conforms to the guidance in HSG264 will contain the basic information that needs to be recorded.

4.8.2 The Asbestos Officer will:

- Ensure that records can be kept of all asbestos locations and conditions in their premises and records are updated following surveys, re-inspection, repair, other treatment or removal.
- Ensure that records are kept in a format which permits clear unambiguous information to be made available to those at risk of disturbing the asbestos and to the emergency services.

4.9 Assessing the risk posed by the presence of asbestos


4.9.1 The Management Survey report will provide the surveyor's 'Material Assessment Score' (MAS) for the asbestos material and any presumed asbestos material in each location that it is found. The material assessment score is an indicator of potential fibre release; it does not automatically follow that those materials assigned the highest priority score in the material assessment will be those that should be given priority for any remedial action. Asbestos management priorities will be informed by undertaking and reviewing priority risk assessments taking into account factors such as:

- Location of the material
- Type of material

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- Accessibility of the material
- Normal activities that take place in the area
- Likelihood/frequency of disturbance from maintenance activities.

4.9.2 The Asbestos Officer/Maintenance Officer will arrange to assess the priority risk for the asbestos material and presumed asbestos material in each location that it is found. These assessments require the material assessment score to be combined with local knowledge of what happens in the location where the material has been found. Services must ensure staff are available to assist in assessing the priority risk for asbestos material.

4.9.3 The final risk assessments (a risk assessment includes a material assessment and a priority assessment) will be compiled for each asbestos-containing material within CONCERTO. The Asbestos Officer will review each report, prior to updating CONCERTO.

4.9.4 Where high risk asbestos-containing material presenting an imminent risk to health is found on a premise, strict controls are to be imposed until the risk is reduced through remedial or removal works. The Asbestos Officer will liaise with the RPO on site where high risk asbestos is located to help organise controls to manage the risk.

4.10 Arrangements for making information available

4.10.1 The RPO in control of a premises must ensure that information about the location and condition of asbestos-containing material is given to anyone who might disturb them – either accidentally or during the course of their work. Information on asbestos within premises is held within the CONCERTO asset management system which is:

- Easily retrievable via the CONCERTO portal at; <https://highland.concerto.co.uk/login.aspx> once logged in type the property name into the 'Search' box and select the Site from the results once the Site page has loaded the Asbestos Management Plan and Floor Plans are available on the documents panel on the right hand side of the screen. Please also see training video [B2 Accessing the Site Asbestos Register and Management Plan Report](#)
- Up to date (please note that any printed copy of the Asbestos Management Plan is not controlled and will only be valid / up to date at the time of printing.
- The Asbestos Management Plan is available for the emergency services providers either via the RPO or by accessing the CONCERTO portal – see section 12.

4.10.2 The purpose of Regulation 4, Control of Asbestos Regulations 2012 is to protect workers in the building and allied trades who may come across asbestos in the course of their work. The measures specified in the management plan include arrangements for the RPO to ensure that every person liable to disturb ACMs or suspect ACMs is provided with information on the location and condition of such materials in the premises for which the duty holder is responsible.

4.10.3 The RPO is required to manage the day-to-day running of the Asbestos Management Plan in their designated premises. To assist in the management of asbestos in properties, the RPO must ensure that:

1. Staff are informed of the location of asbestos materials and Management Plan.
2. Staff are informed when any asbestos works are due to be carried out.
3. Asbestos materials are not disturbed during normal occupant activities.
4. Persons carrying out works in the property are informed of asbestos materials and have access to the Management Plan.

5. Any accidental damage to known asbestos materials is quickly identified and reported.
6. On the discovery of damaged asbestos materials, immediately evacuate and isolate the area, inform building occupants and contact the property Maintenance Officer.
7. All works in the property are directed through the Maintenance Officer so that an asbestos survey will be carried out if required.
8. All work on or which could potentially disturb asbestos materials are directed through the Maintenance Officer.
9. The Maintenance Officer is informed of any planned changes to rooms/areas where asbestos materials are present e.g. change of room name, activity or planned works.
10. Periodic inspections of known asbestos materials are carried out as recommended in the Management Plan.

4.10.4 Where required, the asbestos status of a material not recorded in the Asbestos Management Plan can either be clarified by undertaking a survey by contacting an Asbestos Officer or Maintenance Officer, or any work will have to be planned and managed on the presumption that ACMs are present in the work area.

4.10.5 Arrangements have been made under procurement and the CDM process to ensure that contractors attending a property are suitably trained and informed of the presence of any asbestos. The signing-in of contractors is to record acknowledgements of; Asbestos Register understood; 'Plan-in-Place'; and that evidence of Asbestos Awareness training has been presented at reception/prior to permission for access being given.

4.10.6 Contractor Signing-in sheet

For The Highland Council Use Only												▶▶▶ An Exception is only allowed after permission is granted by a Maintenance Officer (MO) ▶▶▶	
Date	Time		Your Name	Company Name	Your Contact	Location & Description of Work	Job/ Project Ref/No	Asbestos Register	Plan In	Asbestos Awareness		Signature	Exception
	In	Out			Telephone Number			Understood	Place	Yes	No		
3/3/18	10.30	16.30	John Smith	ACME	07712345465	Fix Leaking Pipe, in Kitchen	HC 00000	✓	✓	✓		John Smith	

4.10.7 A suitable and sufficient survey should have been completed prior to any intrusive works being carried out. Persons who have responsibility for:

- ordering improvements or modifications to the premises;
- ordering regular maintenance within the premises;
- arranging reactive repairs to the premises;

are required to be aware of the asbestos status of the building and to follow the procedures that are provided to make information available to contractors or The Highland Council staff. The Asbestos Officer and Maintenance Officer must be informed of proposed changes to property that will affect building fabric or services to ensure all records in CONCERTO are updated.

- 4.10.8 Employees and others, who may inadvertently disturb asbestos-containing materials (ACMs) through their normal occupancy of the premises, are to be informed of the location of ACMs by RPOs so that damage by normal occupancy / work activities etc. can be avoided.
- 4.10.9 Provision of information in an Asbestos Management Plan must be handled in a sensitive and measured way so that individuals understand that asbestos in good condition will do no harm if left undisturbed.
- 4.10.10 Information on the location and condition of any known, or presumed, asbestos-containing materials is made available to the emergency services (via the RPO or externally by accessing the CONCERTO portal – see para 4.3.18). The Fire and Rescue Service in particular need to be made aware when attending site that asbestos-containing materials are in the premises so that they can take the appropriate precautions in case of emergency.

4.11 Management Requirements

- 4.11.1 Asbestos shall be managed with a priority to keep the materials undisturbed and in a safe condition. If this is not practicable, then the asbestos-containing material shall be repaired, removed or made safe. Entry and work in high risk areas should adhere to controls set by the Asbestos Officer, queries and further information can be provided by direct contact with an Asbestos Officer or by e-mail to the following address:

[asbestos.co-ordination@highland.gov.uk mailbox.](mailto:asbestos.co-ordination@highland.gov.uk)

4.12 Project Procedures – Asbestos related works

- 4.12.1 Asbestos removal and remedial/management actions must be planned with long term considerations in mind rather than being left to individual project teams to carry out the minimum work necessary to expedite project immediate goals. The Highland Council Project procedure should be followed (this is stored within the [Programme and Cost Management and Consultancy Team Share Point site](#)).

4.13 Keeping the asbestos management plan under review

- 4.13.1 Asbestos management plans are subject to thorough review annually (as part of the re-inspection process) and on reports of ACM condition change. The review covers:

- The Project procedure to ensure Refurbishment / Demolition surveys are undertaken with results recorded on Asbestos Management Plans;
- Discussion with the RPO (following re-inspections) on any amendments made and how the plan is communicated to those at risk of working on or in close proximity to ACMs/if emergency plans / contingency arrangements refer to the management plan;
- Council and Service re-structuring / team changes to update staff on arrangements.

- 4.13.2 Instances of failure of the arrangements/procedures are also reviewed, for example:

- where procedures have not been followed and why not;
- where procedures have been inadequate and why;
- where exposure to airborne asbestos fibres has occurred.

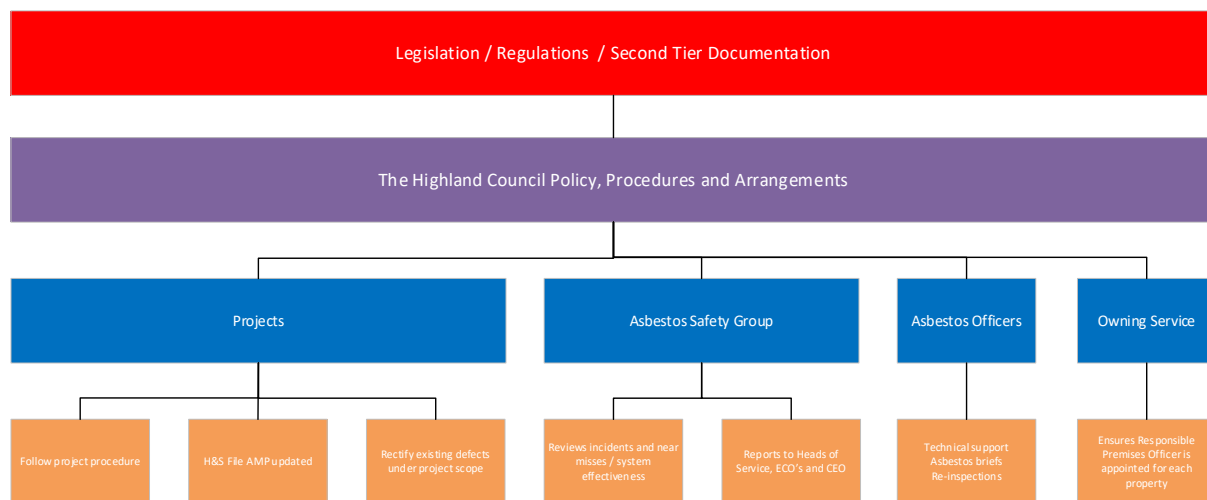
4.14 Arrangements for monitoring Asbestos-containing material

- 4.14.1 Materials that are in good condition and are unlikely to be disturbed may be left in place and subjected to a system of management. The condition of the materials will be checked regularly by the RPO / Facilities Management Assistant (in a school) to ensure that no damage or deterioration has occurred.
- 4.14.2 The time intervals for checking will vary depending on the type of asbestos-containing material, its location and activities in the area. The maximum interval for re-inspection will be no longer than 12 months and, in some cases, will be more frequent depending on friability and risk posed.
- 4.14.3 Details of re-inspections will be recorded and the asbestos register and asbestos management plan updated accordingly in CONCERTO by the Asbestos Officer(s).

4.15 Arrangements for dealing with asbestos-containing material

- 4.15.1 Advice from the Health and Safety Executive (HSE) stresses that it is important that a proportionate approach is taken to managing the risk from asbestos.
- 4.15.2 Materials in poor condition must be repaired or removed. Poor condition means that the materials exposed surface is in a state where there are substantial areas of visibly loose fibres that may be released by very slight disturbance or any material which has suffered significant damage or deterioration.
- 4.15.3 Interim control measures such as localised environmental cleans, repairs or encapsulation may be required until a more permanent solution, e.g. removal, can be implemented. Further information can be provided via asbestos.co-ordination@highland.gov.uk mailbox.
- 4.15.4 Low risk rated asbestos-containing material, can be left in place to be managed and monitored on a regular basis. Other materials that are only slightly damaged can be encapsulated or repaired. Any remediation works must be carried out within a reasonable timescale and notified to the Asbestos Officers.
- 4.15.5 Where asbestos-containing materials have been identified that are not in good condition, or are in a vulnerable position and liable to damage, and it is not practical to repair, enclose or encapsulate, then the asbestos-containing material will need to be removed. Asbestos-containing materials will also need to be removed if the area is due to undergo refurbishment works which will disturb the asbestos-containing material, or where a building is going to be demolished.

4.16 Summary of Controls in Place for Asbestos



5.0 Emergencies involving Asbestos

5.1 All incidents involving disturbance or damage to Asbestos-containing material or suspect Asbestos-containing material must be dealt with in accordance with these emergency procedures.

5.2 Uncontrolled release of asbestos fibres

5.2.1 For uncontrolled releases of asbestos fibres (e.g. loss of containment in an active asbestos working enclosure; spillage from waste bags or damage to wrapped plant/pipe work), vacate the area immediately. People should be moved to a safe area / breathing zone away from the potential exposure. Follow steps in accordance with this section.

5.2.2 If material containing, or suspected of containing, asbestos is damaged or disturbed by accident or during maintenance works or a report of suspected accidental exposure to airborne asbestos fibres is raised:

- Stop all work in progress in the area.
- Evacuate the area to safe boundary.
- Close the area off (doors and windows) and withdraw all persons.
- Prevent access to or through the area (lock doors) and indicate isolated area via signage.

5.2.3 Inform:

- Contractor supervisor (if appropriate) / Contract Administrator if works are involved.
- Responsible Premises Officer of the area or building in which the problem occurred.
- Area Maintenance Officer and Asbestos Officer.
- Complete a list of people in the area at the time of the incident.
- Complete without delay and submit a Corporate Incident/Accident Report Form.

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- Co-operate with any immediate decontamination/remedial works required.
- Retain all documentation relevant to the work / activity being done.
- Prior to reoccupation the Asbestos Officer will consider whether reassurance air monitoring / bulk sampling may be required.

5.2.4 If remedial works are notifiable or if the incident involves the damage of licensed material then a request for a waiver of 14 day notice for HSE may require to be completed for consideration by HSE by an Asbestos Officer in conjunction with the Client officer (the written request will require client signature).

5.2.5 The outcome of any incident investigation will identify if additional actions need to be taken, before the work can continue or access to the area can be allowed.

6.0 Asbestos Safety Group

6.1 The Asbestos Safety Group has been formed to regularly review the Asbestos Safety Management System and to inform the Head of Property and Facilities Management of the effectiveness of the system in reducing risk in property from asbestos and to ensure the system is developed, maintained and implemented.

6.2 The Asbestos Safety Group shall undertake a coordinated approach to the establishment and management of The Highland Councils Asbestos Safety Management System.

6.3 The Asbestos Safety Group shall possess adequate professional knowledge, industry experience to develop and manage the necessary procedures to ensure that the safe management of asbestos in Highland Council premises. The Service Lead – Corporate Property will manage the development, production and consultation of procedures. The Asbestos Safety Group shall be required to liaise with other professionals and senior managers.

6.4 The Asbestos Officers shall give advice on any matter relating to the Control of Asbestos Regulations 2012 and shall act as the central point through which all Non-Domestic asbestos matters shall be coordinated.

6.5 The Asbestos Officers should be notified by line Managers via the Asbestos Co-ordination email asbestos.coordination@highland.gov.uk of any incidents or instances of non-compliance with the Control of Asbestos Regulations 2012 or the arrangements / procedures set out in this document.

6.6 The Asbestos Safety Group shall provide information directly to the Head of Property and Facilities Management and to the Chief Executive, Executive Chief Officers and relevant Heads of Service.

6.7 The Asbestos Safety Group meetings shall be chaired by the Service Lead – Corporate Property. Trade Union representatives are welcome to attend

6.8 Minutes of the bi-annual meetings will be issued to:

- The Chief Executive
- All Executive Chief Officers
- The Head of Property and Facilities Management
- The Head of Housing and Building Maintenance

- The Occupational Health Safety and Wellbeing Manager.

7.0 Training Requirements

7.1 The Highland Council will provide an asbestos awareness training program to all relevant employees. See Appendix 2 for Asbestos Awareness eLearning Course Booking Instructions.

7.2 Awareness Training

7.2.1 Awareness Training will be given to those persons:

- Who may disturb asbestos while carrying out their normal everyday work.
- Who influence, plan, procure or supervise how work is carried out.
- Whose work could foreseeably expose them to asbestos.
- Who work in areas where they may be incidentally exposed to asbestos.

7.2.2 Awareness training must comply with Control of Asbestos Regulations 2012 Regulation 10 and Approved Code of Practice L143 Paragraphs 232-237. Additional training (BOHS P405 & P407) shall be provided to appropriate staff (e.g. Senior Maintenance Officer, Principal Officers and Engineers to maintain competency in the safe management of asbestos-containing material on The Highland Council premises.

7.2.3 Awareness training is required annually and should be based on a training needs analysis; refresher training may be provided in the form of a toolbox talk at team meetings. All asbestos training must be provided by someone who is competent to do so, who has adequate personal practical experience and who has a theoretical knowledge of all relevant aspects of the work being carried out by the employer.

7.2.4 Line Managers shall ensure that instruction, training, and supervision are provided at the induction stage to new staff that are employed in premises with asbestos or have the ability to make alterations to Highland Council properties that have the potential to disturb asbestos.

7.2.5 Trainers and courses (internal and external) shall be audited by the Asbestos Officer to assess compliance with The Highland Council and HSE requirements.

7.2.6 A program of 'refresher' training is to be provided to all technical staff to ensure they are aware of current legislation, codes of practice in relation to asbestos safety and service procedures to be followed.

7.2.7 Employees have a duty under the Health and Safety at Work Act 1974 Section 7 to undertake health and safety training. They should make themselves available for training and working practices should be in line with the training given. If any employee has any concerns with an item raised during training, this should be brought to the attention of the Service Lead – Corporate Property.

8.0 Monitoring Compliance – Non-Domestic

8.1 Controls relating to the management of risk from asbestos in premises are to be reviewed on a regular basis to ensure their suitability. Premises controls should include:

1. Up to date RPO details within CONCERTO. This is as detailed in the Health, Safety and Wellbeing Policy.
2. Familiarisation for all staff with the location of asbestos.
3. Suitable premises emergency action plan with reference to an asbestos incident.
4. Access for staff and contractors to an up to date asbestos register/AMP.

9.0 Monitoring Compliance –Domestic

9.1 For domestic properties, Housing Services shall ensure that sufficient and robust procedures are in place for the monitoring of asbestos. This information shall be detailed in their separate 'Asbestos Safety Management System for Domestic dwellings' document.

10.0 Premises Guide to Asbestos Management

10.1 The Responsible Premise Officer (RPO) is a senior manager who has operational responsibility for the management of risk in a property occupied by a particular Service provider.

10.2 The RPO shall ensure that at all times a manager or senior officer is available, who has the knowledge and capability to manage property risk.

10.3 Asbestos materials can cause a significant risk to occupants of properties if not adequately managed. Properties built prior to 2000 have the potential to contain asbestos materials and these are included in the Asbestos Management Plan for the building. If asbestos materials are in good condition and unlikely to be disturbed by occupant activities, removal is not required but the materials should be adequately managed.

10.4 To assist in the management of asbestos in properties, the RPO must ensure that:

- Staff are informed of the location of asbestos-containing materials that are detailed within the Management Plan to minimise the risk of disturbance during normal occupational activities.
- Staff are informed when any asbestos works are due to be carried out.
- Persons carrying out works in the property are informed of asbestos materials and have access to the Management Plan. Access is to be denied if insufficient information is available to confirm; Proposed works have been reviewed ('Plan-in-Place' available); Asbestos Management Plan (and an appropriate Refurbishment and Demolition survey has been reviewed); and evidence of asbestos awareness training has been provided.
- Any accidental damage to known asbestos materials is quickly identified and reported.
- On the discovery of damaged asbestos materials, and refer to the emergency procedures set out in Section 5 within these arrangements.
- The Maintenance Officer is made aware of all works in the property.

- The Asbestos Officer and Maintenance Officer are informed of any planned changes to rooms/areas where asbestos materials are present e.g. change of room name, activity or planned works.

10.5 Records of asbestos materials can be found in the Asbestos Management Plan and on the CONCERTO database. The records are to be kept in the property and made available to staff, building occupants and anyone carrying out work in the property:

- Up-to-date Asbestos Management Plan.
- Property plans showing locations of asbestos materials.
- Works on asbestos materials including repairs, removals, air sampling certificates, certificates of re-occupation etc.
- Asbestos surveys carried out.
- Minutes of staff meetings where information on asbestos materials was discussed/shared.

11.0 Internal Training Courses

11.1 Internal training courses for Asbestos Awareness are available on the Council's internal learning platform 'Traineasy', which can be accessed here: <https://highlandcouncil.traineasy.com/login>. Once logged in to your Traineasy account click on 'Course Catalogue' then 'Health & Safety Essentials'.

12.0 Access to CONCERTO

12.1 CONCERTO is the Council's Corporate Property Asset Management System and contains records and information for all the Council's non-domestic property.

12.2 Access to CONCERTO is managed by the Property Systems Support Team. User requests for access can be made by emailing property.systems.support@highland.gov.uk

12.3 CONCERTO is a cloud hosted web-based system which can be accessed from any device running a web browser and connected to the internet.

12.4 Training videos on how to use CONCERTO is available to Council employees via the Concerto Resources Channel on Microsoft Stream: <https://web.microsoftstream.com/channel/a9b66db8-37c3-4bf1-a56d-85db4135d2e1>

12.5 Training videos specifically on Asbestos information in Concerto are available as follows:

[B2 Accessing the Site Asbestos Register and Management Plan Report](#)

[B3 Site Asbestos Register in Concerco](#)

12.6 A step-by-step user guide for Asbestos Information in CONCERTO is available in the CONCERTO 'Library' on the top menu bar.