

Asbestos management plan for the control of asbestos in LFB

New policy number:

694

Old instruction number:

PN532

Issue date:

3 February 2010

Reviewed as current:

16 January 2025

Owner:

Assistant Director, Property and TSS

Responsible work team:

Property Group

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Key point summary

The following document is the LFC Asbestos Management Plan (AMP) approved in June 2006 (reference: FEP873) as required under 'The Control of Asbestos Regulations 2012 and as directed by the overarching Policy number 564 - Procedures for managing asbestos in LFB premises.

Compliance with the controls and procedures within this document are mandatory on all staff ensuring that asbestos is correctly managed on all LFB premises so that no person is exposed to asbestos material in a form that can cause harm.

These procedures do not apply to operational incidents involving asbestos which are covered by Policy number 519 – Incidents involving asbestos and Policy number 411 - Notification of possible contamination by material(s) that may be hazardous to health.

1 Introduction and regulations

- 1.1 The Control of Asbestos Regulations (CAR) (2012) came into force on 6 April 2012 updating previous asbestos regulations to take account of the European Commission's view that the UK had not fully implemented the EU directive on exposure to asbestos.
- 1.2 The asbestos regulations create a duty on all premises owners and premises managers to manage the risks from asbestos to those using the premises or those working within and to appoint a duty holder. Furthermore, there is a duty under the Construction (Design and Management) Regulations 2015 to ensure that adequate information on hazards such as asbestos containing materials is provided to enable adequate arrangements to deal with asbestos during construction/refurbishment works.
- 1.3 CAR (2012) s4 requires duty holders to assess whether premises contain asbestos; assess the risk from asbestos; and take action to manage the risk from asbestos, and CAR (2012) s4.2 states that:
"Every person must cooperate with the duty holder so far as necessary to enable the duty holder to comply with the duties set out under this regulation".
- 1.4 The Assistant Director for Property Services is the duty holder on behalf of LFC in relation to premises which form the LFB estate and where the LFC has an obligation in respect of asbestos containing materials.
- 1.5 The CAR regulations state that:
"In order to manage the risk from asbestos in non-domestic premises the duty holder must ensure that a suitable and sufficient assessment is carried out as to whether asbestos is or is liable to be present in the premises" CAR (2012) s4.3.
- 1.6 To comply with this regulation LFC will:
 - Take reasonable steps to determine the location of materials likely to contain asbestos.
 - Presume materials contain asbestos unless there are good reasons not to do so.
 - Keep and maintain a written record of the location, condition, maintenance and removal of all asbestos and presumed asbestos materials.

Where asbestos containing materials (ACMs) are identified the LFC will:

- Repair, seal or remove asbestos if there is a risk of exposure due to its condition or location.
- Maintain it in a good state or repair and monitor its condition.
- Inform anyone who is likely to disturb it.
- Have arrangements and procedures in place, so that work that may disturb the materials complies with CAR (2012).

To comply the LFC will manage the risks by:

- Producing and maintaining a mandatory asbestos management plan (AMP), containing procedures to reduce the risk of exposure to asbestos (this plan).
- Managing a cyclic survey programme to identify and record all asbestos containing material (ACM).
- Ensuring that a risk assessment is undertaken for all ACM identified.
- Putting in place suitable controls, including labelling, to minimise the risk of exposure where ACM are to remain in situ.
- Ensuring where ACM are to be removed, encapsulated, or treated, that such work is undertaken by approved contractors.
- Producing a prioritised action plan to ensure the risk of exposure to ACM is minimised.
- Ensuring appropriate levels of information are available to those persons liable to disturb ACM.
- Establishing effective record keeping systems and processes to ensure that information on the presence of and risk from asbestos is kept up to date.
- Monitoring, reviewing and agreeing changes to the asbestos management plan as appropriate, this plan will be reviewed no later than May 2026 or updated earlier as required.

1.7 In addition to CAR (2012) the principal sources of guidance and information relating to asbestos are:

- The Health and Safety at Work etc Act 1974.
- The Management of Health and Safety at Work Regulations 1999 (MHSW).
- The Construction (Design and Management) Regulations 2015.
- The Workplace (Health Safety and Welfare) Regulations 1992.
- The Control of Substances Hazardous to Health Regulations 2002 (COSHH).
- Hazardous Waste (England and Wales) Regulations 2005 (as amended).
- HSG 264 Asbestos: The Surveying Guide 2012.
- ACoP L143- Managing and Working with Asbestos (Second edition) 2013.

These are further detailed in part 9.

2 Roles and responsibilities

2.1 The LFC has placed responsibilities on **senior LFB staff**; these are detailed in the Policy number 564 - Procedure for managing asbestos in LFC premises.

2.2 This section outlines the roles and responsibilities of key personnel who have a direct role in the Asbestos Management Plan and the processes related to asbestos surveying and removal. The roles and responsibilities link directly to the process flow charts included within this plan.

2.3 The roles and responsibilities are:

Head of Technical Assurance (Property)

- Appointed person on behalf of the Duty Holder.
- Holder of LFC Asbestos Management Plan.
- Compliance with asbestos Policy number 564 - Procedure for managing asbestos in LFC premises and this policy.
- Budgetary control for asbestos related expenditure.
- Management of the Asbestos Supplier.
- To store records of all known asbestos.
- Reporting to the LFC on asbestos issues.
- Reporting on the spend for asbestos related work.

- **Bellrock and the LFB Maintenance contractors (Bellrock and ABM)** Duty to co-operate CAR (2012) s42.
- Compliance with asbestos Policy number 564 - Procedure for managing asbestos in LFB premises and this policy.
- To store records of all known asbestos.
- Reporting to the LFC on asbestos issues.
- Reporting on the spend for asbestos related work.
- First point of contact is through the Bellrock LFB Property Portal for mobilising the Asbestos Supplier (AS) for asbestos incidents, telephone extension 89100 option 2.

LFB asbestos supplier

Currently:

Tersus Consultancy Ltd

Phoenix House
Suite 13
Christopher Martin Road
Basildon
SS14 3EZ

Direct Contact Number: 01708 555705

Responsibilities include:

- Duty to co-operate CAR (2012) s 4.2.
- First point of contact for all matters relating to the management of asbestos.
- Representation in LFB meetings.
- Maintain accurate and up to date asbestos information and input into the information management system (IMS).
- Maintain accurate records of asbestos surveys and removals.
- Provision of advice to client representatives.
- Compliance with asbestos Policy number 564 - Procedure for managing asbestos in LFC premises.
- Co-ordination of the LFC Asbestos Management Plan.
- Supporting the LFB Technical Compliance Manager in all asbestos matters.
- Advising all Project Managers and Project Sponsors on asbestos management.
- Distribution/updating asbestos information to premises/station.
- Management of programme of surveys and removal works.
- Management and co-ordination of Refurbishment and Demolition/Pre Project Asbestos Surveys (PPAS) Surveys.
- Management and co-ordination of Management Asbestos Surveys.
- Management and co-ordination of cyclical re-inspection surveys.
- Management and co-ordination of samples and air tests.
- Management and co-ordination of asbestos removal works.
- Provision of historical information on asbestos to project teams.
- Representation at pre-start meetings for removals.
- Review and agreement of method statements.
- Site audits of removal works (with H&S team).
- Obtaining certificates for all processes.
- Provision of training as required.
- Out of hours asbestos support.

Head of Projects (Property)

- Compliance with asbestos Policy number 564 - Procedure for managing asbestos in LFC premises and this policy.
- Request asbestos information from Bellrock LFB Property Portal extension 89100 option 2.
- Duty to co-operate CAR (2012) s4.2.
- Liaison with Bellrock LFB Property Portal Projects Team extension 89100 option 2 (if appropriate) at project inception to determine whether asbestos surveys/removal required.
- Allowance for time and cost of asbestos surveying and removal in project planning and programme.
- Provision of project information to allow pre-project surveying to take place or instruction of others to provide such information.
- Ensure information on known asbestos is forwarded to appropriate consultant/contractor.
- Inform Bellrock LFB Property Portal extension 89100 option 2 of any incidences involving asbestos.
- Provision of post-completion updates and certificates on ACMs to Asbestos Supplier.
- Attending training sessions as required.
- Follow procedures for planned works documented in Parts 5 and 6 of this policy.
- Awareness of relevant processes in this plan.

Consultant Project Managers

- Compliance with asbestos Policy number 564 - Procedure for managing asbestos in LFC premises and this policy.
- Duty to co-operate CAR (2012) s4.2.
- Liaison with LFB Project Sponsor at project inception to determine whether asbestos surveys/removal required.
- Allowance for time and cost of asbestos surveying and removal in project planning and programme.
- Provision of project information to allow pre-project surveying to take place.
- Liaison with Asbestos Supplier regarding project.
- Ensure information on known asbestos is included in tender documentation as necessary and forwarded to contractor.
- Liaison with Asbestos Supplier regarding procurement of asbestos removal works.
- Inform Bellrock LFB Property Portal extension 89100 option 2 of any incidences involving asbestos.
- Provision of post-completion updates and certificates on ACMs to Asbestos Supplier.
- Attending training sessions as required.
- Follow procedures for planned works documented in Parts 5 and 6 of this policy.
- Awareness of relevant processes in this plan.

LFB Property Facilities Managers and Facilities Officers

- Compliance with asbestos Policy number 564 - Procedure for managing asbestos in LFC premises and this policy.
- Duty to co-operate CAR (2012) s4.2.
- Provision and receipt of data to and from landlords and tenants to Bellrock LFB Property Portal.
- Obtaining previous management surveys/asbestos records for acquired premises.
- Awareness of relevant processes in plan.

LFB Person(s) in Control of Premises

- Compliance with asbestos Policy number 564 - Procedure for managing asbestos in LFC premises and this policy.
- Maintaining, updating and receipting the received asbestos information for section three of the premises logbook.
- Reporting any missing premises logbook information to the Bellrock LFB Property Portal extension 89100 option 2 for action by the Asbestos Supplier.

- Ensuring that staff and contractors know that the building contains or may contain asbestos, its type and location and ensure they sign the premises logbook.
- Duty to co-operate CAR (2012) s4.2.
- Attending pre-start meetings for removal works and advising on operational requirements as necessary.
- Preventing unauthorised access to OTR 'Off the Run' areas.
- Contacting the relevant persons if asbestos materials or suspected asbestos materials become damaged. Bellrock LFB Property Portal extension 89100 option 2 for a Priority 2 action by the Asbestos Supplier.
- Awareness of relevant processes in this plan.

All LFB staff

- Compliance with asbestos Policy number 564 - Procedure for managing asbestos in LFC premises and this policy.
- Contacting the relevant persons if asbestos materials or suspected asbestos materials become damaged. Call Bellrock LFB Property Portal extension 89100 option 2 for a Priority 2 action by the Asbestos Supplier.
- Awareness of relevant processes in this plan.
- Duty to co-operate CAR (20012) s4.2.
- Attend training sessions as required.

All LFB suppliers

- Compliance with asbestos Policy number 564 - Procedure for managing asbestos in LFC premises and this policy.
- Duty to co-operate CAR (2012) s4.2.
Contacting the relevant persons if asbestos materials or suspected asbestos materials become damaged. Bellrock LFB Property Portal extension 89100 option 2 for a Priority 2 action by the Asbestos Supplier.
- Awareness of relevant processes in this plan.
- Sign into premises logbook and consult asbestos information prior to undertaking any work on LFC premises.
- Attend training sessions as required.

3 Asbestos record keeping and communication

- 3.1 This section details the records maintained on the presence of known ACMs and the procedures in place for updating these records as necessary. In addition, it details the Information Management System record keeping relating to the potential exposure of personnel to asbestos.

Control of works

- 3.2 In order to maintain both statutory compliance and data integrity, all work which involves asbestos in LFC premises and requires works orders to be raised or progress checks on existing works orders to be made, **must** be directed through the Bellrock LFB Property Portal (extension 89100 option 2).
- 3.3 All maintenance and building works will be controlled so that the presence of known ACM is brought to the attention of those persons undertaking works before any work begins, so minimising the risk of accidental exposure.
- 3.4 **No intrusive** works to the fabric of any LFC premises is to be undertaken without first following the procedure in part five of this asbestos management plan.

Asbestos information

- 3.5 Prior to any work being carried out on LFC premises which is liable to disturb the fabric of, or the services within, the premises, the asbestos information held in the premises logbook, section 3 must be consulted OR the IMS location should be reviewed for asbestos information.
- 3.6 This information consists of a tabular 'Summary of Asbestos' for the premises and annotated plans indicating the location of known asbestos.
- 3.7 Any person undertaking such work must complete a formal signing in procedure at the premises which acknowledges that their attention has been brought to the asbestos information.
- 3.8 The summary of asbestos may indicate 'presumed asbestos' or 'no access' for areas recorded as inaccessible during the survey. Where these areas are due to be opened up or accessed in any way, the Asbestos Supplier shall be contacted via Bellrock LFB Property Portal to determine the presence or not of asbestos **before any** work is allowed to commence.
- 3.9 The person in control of the premises shall be responsible for the safekeeping and updating and receipting of the asbestos information received in the premises logbook at section 3.
- 3.10 Asbestos information in premises logbooks is updated by the Asbestos Supplier following the removal of asbestos or identification of additional asbestos and annually following re-inspections (see 3.14 and 4).

Labelling of asbestos

- 3.11 Whilst there is no statutory obligation to label ACMs once their location is known, the policy for LFC premises is to fit asbestos warning labels where it is practicable to do so, since the presence of labels will further contribute to our statutory duty to manage the ACM and reduces the risk of accidental asbestos exposure.
- 3.12 **Labels are not to be removed** or covered without prior consultation with the LFB Technical Compliance Manager.

Central asbestos records

- 3.13 In order to demonstrate compliance with Regulations and provide evidence to enforcing authorities the following records for each premises will be maintained by the Asbestos Supplier in the Information Management System. The asbestos records will be maintained in a controlled manner. Information will be stored in individual folders for each premises with each folder containing the following information:
- General asbestos correspondence (licences and insurance, notifications and waivers, incident correspondence).
 - Refurbishment and demolition surveys and pre project asbestos surveys.
 - Management asbestos surveys with marked plans.
 - Air clearance certificates.
 - Waste consignment notes.
 - Ad hoc asbestos samples.

A copy of the all survey reports and air clearance certificates are also available for viewing on the Information Management System.

Updating of records

- 3.14 CAR (2012) s4.6 requires duty holders to keep premises records of all known asbestos up to date. Following the identification of asbestos, a change in the risk rating of known asbestos or the completion of remedial/removal work, the Asbestos Supplier shall update the premises logbook with a revised summary of asbestos and revised annotated plans. The Asbestos Supplier will also add signage to all

access points of the area to warn others that no access is permitted until remediation works are completed.

- 3.15 The Asbestos Supplier shall also inform LFB Technical Compliance Manager of the identification of asbestos, a change in the risk rating of known asbestos or the completion of remedial/removal work. The Asbestos Supplier shall ensure that all central records are updated accordingly. An asbestos tracker shall be issued to the LFB Technical Compliance Manager to ensure all ongoing works can be tracked until works are fully delivered to rectify the issue.

Exposure to asbestos

- 3.16 Where an employee has been, or believes they have been, exposed to airborne asbestos whilst on LFC premises the exposure is to be reported as a safety event on the SERD, in accordance with Policy number 368 - Health, safety and environmental event investigation policy (personal injuries, near misses and traffic accidents) and the Bellrock LFB Property Portal informed extension 89100 option 2 to raise a Priority 1 works order to the Asbestos Supplier.
- 3.17 If the SERD investigation confirms an individual has been exposed then the investigating officer will inform the Health and Safety Services Department (HSS) who will liaise with the HSE for the purposes of RIDDOR, the line manager of the employee must also complete an Asbestos Exposure form for exposed individual (see Appendix 1). The completed forms must be passed to HSS, who will check the details and pass to Human Resources and Development to be recorded on the individual's Personal Record File (PRF).

4 Management surveys and cyclical inspection of asbestos

This section details the requirements of CAR (2012) s4.3, s4.9 and s4.10 undertaking of management surveys to determine the presence of asbestos and the procedures in place for the cyclical inspection of known asbestos in order to maintain accurate records.

Management surveys

- 4.1 LFB have undertaken management surveys (as defined in Asbestos: The Survey Guide HSG 264) to all asset owned premises for which the LFC is the duty holder and pre date 2000. LFB has a standard specification for management surveys which are managed by the Asbestos Supplier and carried out by a specialist surveyor from LFB's list of surveyors who have been assessed as sufficiently competent.
- 4.2 The purpose of a management survey is to locate, as far as reasonably practicable, the presence and extent of any ACMs in the building which could be damaged or disturbed during normal occupancy, including foreseeable maintenance and installation, and to assess their condition.
- 4.3 Management surveys cover the entire premises and include an inspection of all areas as far as reasonably practicable. Representative samples are collected and analysed for the presence of asbestos. Any material that can reasonably be expected to contain asbestos must be presumed to and all materials that are presumed to contain asbestos are sampled where these are accessible.
- 4.4 All sample points are labelled with a unique identifier which is subsequently recorded on the survey and premises plan. Once a sample has been returned as positive for asbestos, the specialist surveyor returns to site to affix an asbestos warning label to the material.
- 4.5 The management survey reports contain photographs of all samples taken together with risk ratings for identified ACMs. The risk scores rate each incidence based on the type and condition of the material and the location.
- 4.6 Marked floor plans are included in the completed survey reports which illustrate the entire premises site. All sample references are marked on the plans and where a sample has been analysed as negative for

ACM the incidence is marked in green and were analysed as positive, the incidence is marked in red. Where areas have not been accessed these are marked in blue.

Cyclical inspections

- 4.7 Annual re-inspections of known ACM which are left in situ are undertaken to ensure that all information pertaining to the presence of ACMs across the portfolio is accurate and up to date. This includes information on the incidence, condition and labelling of ACMs as well as the risk rating scores.
- 4.8 Where any ACM are left in situ re-assessments shall be undertaken annually, the results shall be used to update all records as detailed in Section 3.
- 4.9 Updated asbestos records will be sent to each premises by the Asbestos Supplier and upon receipt the person in control of the premises shall update section three of the premises logbook and send the receipt signed back to the Asbestos Supplier.

5 Asbestos and projects

- 5.1 This section details the procedures relating to asbestos and all LFB project work. This process is applicable for **any works** which involve intrusive works into the structure or fabric of a premises including;
 - (i) All capital projects by all LFB departments and those managed by Bellrock (ABM and Bellrock).
 - (ii) All planned programme works by all LFB departments and Bellrock (ABM and Bellrock).
 - (iii) All planned maintenance by all LFB departments and Bellrock (ABM and Bellrock).
 - (iv) All reactive maintenance by all LFB departments and Bellrock (ABM and Bellrock).
- 5.2 LFB has a rolling programme of refurbishment and improvement works across its portfolio of operational fire stations. In addition, in any financial year there are a number of stations to which major projects are carried out that affect all areas.
- 5.3 In most cases, due to the operational nature of the stations, work takes place while the buildings remain occupied and is phased so as to cause minimum disruption.
- 5.4 The procedure for all contractors working on LFC premises is detailed in **Figure 1**.
- 5.5 The procedure for asbestos information for projects is detailed in **Figure 2**.

Prior to projects

- 5.6 For planned works it is the responsibility of the project manager/project sponsor to consult the Asbestos Supplier via the Bellrock LFB Property Portal (extension 89100 option 2) who will raise a works order for the information or service required. The project manager/project sponsor must supply existing and proposed drawings together with a brief specification and programme for the works and allow at least four weeks for asbestos tests.
- 5.7 The Asbestos Supplier will appraise the known asbestos information for the site and either instruct a 'Review of Historical Information' or a 'Pre Project Asbestos Survey'.

Reviews of historical information

- 5.8 For many premises, significant historical information is held in the form of surveys and records of removal works. If deemed appropriate, the Bellrock LFB Property Portal will instruct the Asbestos Supplier to provide a summary of such information to the project team.

Historical Information forms contain details of all known surveys and their findings together with the asbestos removal history for the premises. The forms detail all remaining incidences of asbestos within

the work areas and advise on any requirements for additional sampling or removal/remediation work to allow the project to go ahead.

Upon receipt of the information the LFB project manager/sponsor shall discuss the results with the Asbestos Supplier and follow his instructions as the Duty Holder's Appointed Person.

- 5.9 If required, the Asbestos Supplier will reissue all previous surveys to the project team upon instruction through the Bellrock LFB Property Portal.

Refurbishment - Pre-Project Asbestos Surveys (PPAS) and R&D Surveys (Refurbishment and Demolition Surveys)

- 5.10 While management surveys provide base level information on the presence of ACMs, these surveys do not provide adequate information on 'hidden' asbestos which may be disturbed by project works.
- 5.11 The refurbishment/pre-project asbestos survey is designed to provide more detailed information on the presence of asbestos than management surveys, within the limitations of an operational occupied building. All areas are accessed, and observations/analysis is undertaken of all materials within the work vicinity. Where areas cannot be accessed these are noted within the report and a return survey can be arranged following vacation of the area if deemed necessary.
- 5.12 A major PPAS and R&D Surveys covers all areas of a station and a minor PPAS is to the identified work areas only.
- 5.13 The survey report is intended to ensure as far as possible, that contractors working on site have an accurate and comprehensive record of **all** materials to minimise the risk of delays to projects through prior identification of suspect materials, and to enable LFB to have the option to remove asbestos materials before projects or phase the removal during the project works.
- 5.14 The PPAS is unique to the requirements of LFB and the extent of sampling for this pre-project asbestos survey is more investigative and intrusive than the 'management survey' detailed in HSG 264 but less so than the 'refurbishment and demolition survey' due to the occupation of the stations.
- 5.15 Where refurbishment/pre project asbestos surveys are required, these will be commissioned via the Bellrock LFB Property Portal extension 89100 option 2, and managed by the Asbestos Supplier.

Demolition surveys

- 5.16 This type of survey is used to locate and describe, as far as reasonably practicable, all ACMs in the building and will involve destructive inspection, as necessary, to gain access to all areas, including those that may be difficult to reach. A full sampling programme is undertaken to identify possible ACMs and estimates of the volume and surface area of ACMs made. The survey is designed to be used as a basis for tendering the removal of ACMs from the building prior to demolition or major refurbishment so the survey does not assess the condition of the asbestos, other than to note areas of damage or where additional asbestos debris may be expected to be present.
- 5.17 A demolition survey will only recommend 'removal' of ACMs as opposed to any of the other recognised management techniques as it is undertaken on the presumption that the area is to be demolished or refurbished. Due to their destructive nature, demolition surveys are not carried out in occupied buildings.
- 5.18 Where demolition surveys are required, these will be commissioned via the Bellrock LFB Property Portal, extension 89100 option 2, and managed by the Asbestos Supplier.

Procurement of asbestos removal or remediation works

- 5.19 If asbestos removal or remediation is required to facilitate works on site this is instructed and subsequently procured and managed by the Bellrock LFB Property Portal, extension 89100 option 2.

- 5.20 The method of procurement will depend upon the extent of the removal works, whether these can be undertaken in advance of the project work and the contract under which the project work is being undertaken.
- 5.21 For minor asbestos removal or remediation works undertaken in advance of the project, quotations will be obtained from licensed asbestos removal contractors in line with LFB's standing orders. This work will be wholly arranged and managed by the Asbestos Supplier and the project team informed when works are complete.

For LFB managed projects

- 5.22 For asbestos removal or remediation works which are required to be carried out as part of the main project the main contract must be let as a JCT Intermediate Contract to allow the use of the IC/Sub/Nam. In this instance, the asbestos removal tender documents are prepared by the Asbestos Supplier in close liaison with the lead consultant.

Figure 1

Procedure for all contractors/consultants working on LFC premises

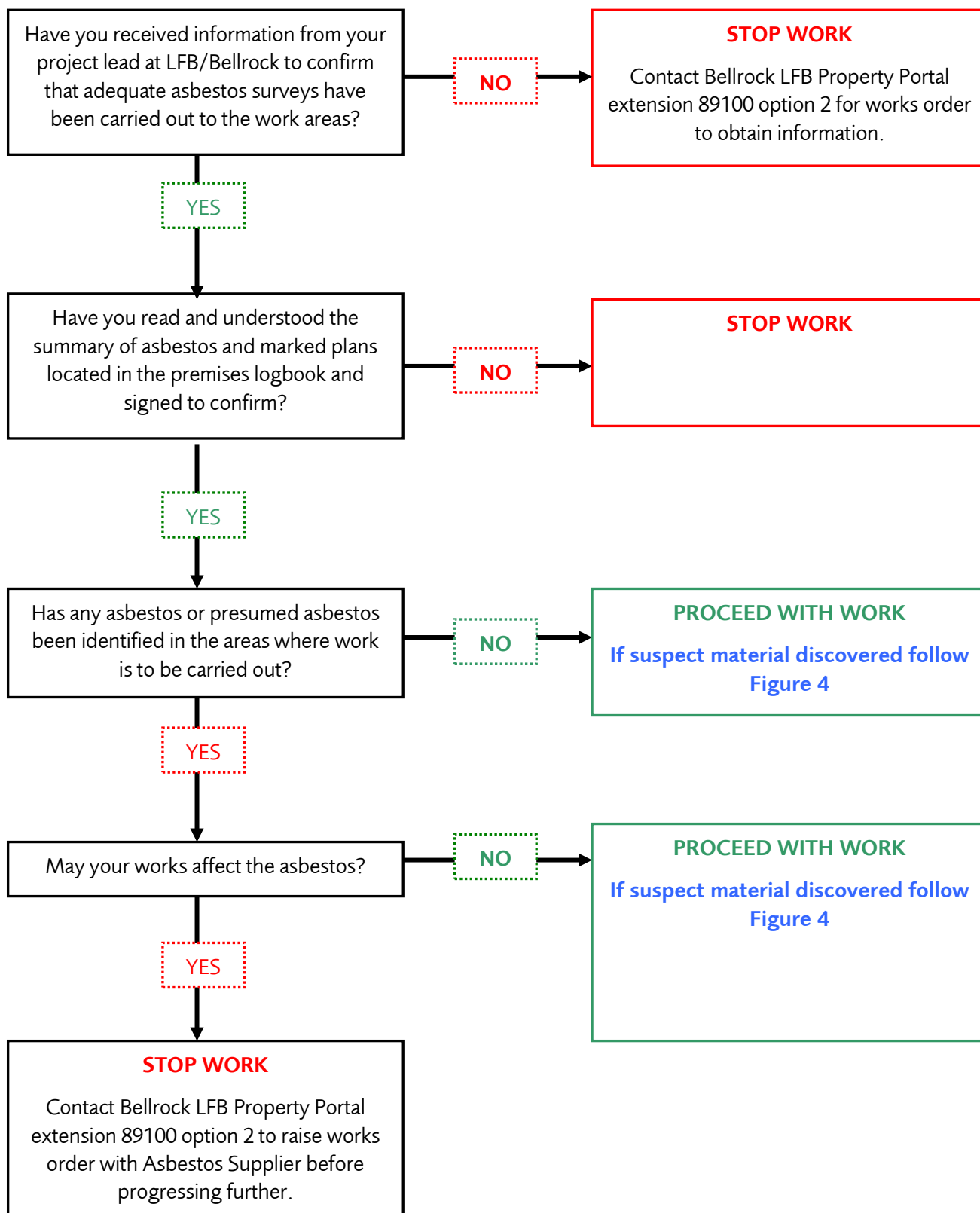
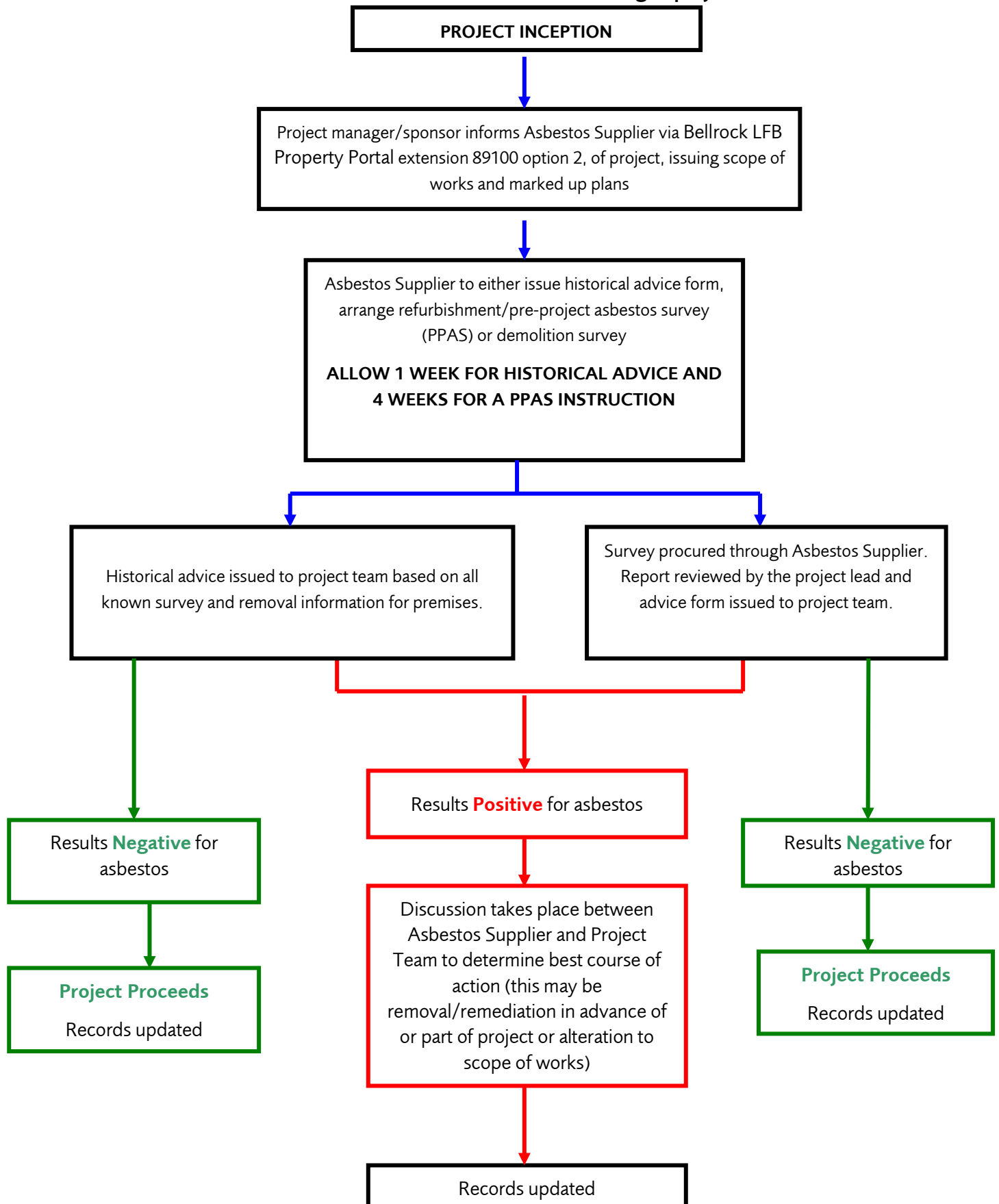


Figure 2

Procedure for asbestos information for all LFB/Bellrock managed projects



Asbestos removal and remediation works

- 5.23 This section details out the procedures for the management of asbestos removal and remediation works to LFC premises.
- 5.24 ACoP L127 states that 'if ACMs are in good condition and are unlikely to be damaged or disturbed, then it is better to leave them in place and to introduce a system of management'.
- 5.25 It is LFB's policy to remove asbestos:
- Where asbestos is vulnerable to damage or in a poor condition
 - Where asbestos may affect the operational running of a fire station or prevent planned works from being undertaken
 - Where refurbishment or demolition works are planned and asbestos can be removed beforehand or as part of the works
- 5.26 It is not always possible to remove all known asbestos where materials are embedded within the structure of a building. Additionally, in some cases the financial cost of removals or the potential impact upon operations make encapsulation or management in-situ more appropriate options.
- The most appropriate course of action in each instance will be decided by the Asbestos Supplier.
- 5.27 **All** works involving asbestos removal **must** be initially notified and channelled via the Bellrock LFB Property Portal extension 89100 option 2 to the Asbestos Supplier.

Removal contractors

- 5.28 All asbestos removal and remediation work on LFC premises **must** be carried out by licensed asbestos removal contractors irrespective of whether the product or type of work falls under the requirements for licensing detailed in CAR (2012) s8.0.
- 5.29 Only with prior agreement from the Asbestos Supplier, minor non-licensable work covered by the HSE 'Asbestos Essentials' task manual may be carried out by a non-licensed contractor. This work will still be subject to the requirements for the preparation and approval of plans of work/method statements detailed below.

Plans of work/method statements

- 5.30 Prior to any asbestos removal or remediation project, a site specific plan of work (sometimes known as a method statement) as detailed in CAR (2012) s7.0 is submitted to the Bellrock LFB Property Portal extension 89100 option 2 for approval by the Asbestos Supplier. This is then forwarded to the project lead for approval, once approved the Asbestos Supplier will contact the premises and brief the person in control of the premises regarding the removal works.
- 5.31 This plan of work outlines the details of the job including the method of removal of the asbestos, the type of equipment to be used including PPE and RPE, control measures to be adopted and the methods for handling and disposal of waste.
- 5.32 The project lead is responsible for reviewing the plan of works to ensure that it contains the adequate information and ensuring that it is distributed to all relevant parties.
- 5.33 A copy of the plan of work remains on site for the duration of the works and is amended if any significant changes on site are necessary.

Notification to HSE

- 5.34 If the work is licensable, notification to the HSE is required at least 14 days before the start date. It is the responsibility of the Asbestos Supplier to notify the HSE using the standard form ASB 5.

- 5.35 If the work is notifiable non-licensed work, the HSE need to be notified by the removal contractor using online form ASB NNLW1. There is no minimum notice period for NNLW work.
- 5.36 If the scope or method of work alters or the proposed work dates are changed following notification, the enforcing **authority must** be informed. A copy of the ASB5/NNLW1 must be held by the Bellrock LFB Property Portal prior to works starting.
- 5.37 In exceptional cases a waiver may be sought from the HSE to reduce the 14 day notification period for licensed work. It is the HSE's policy that waiver requests will be granted only when there is a genuine emergency.

Pre-start meetings

- 5.38 If required, pre-start meetings for asbestos removal or remediation works are attended by the Asbestos Supplier and person in control of the premises. If necessary, the project manager/sponsor may attend.
- 5.39 Pre-start meetings cover the timing and phasing of the works, areas to be out of use, locations of skips, decontamination units and enclosures and transit routes for waste. The meeting should allow the works to be planned so as to cause the minimum disruption to the operations of the station.

Minutes of the pre-start meeting are distributed to all attendees including the Asbestos Supplier.

Temporary facilities

- 5.40 The nature of asbestos removal work often requires areas of the premises to be shut down, with access in an emergency only available to trained personnel. Asbestos containing material is most prominent within boiler rooms and this may result in the need for temporary showers and heating. In addition, other temporary facilities may be required if areas are taken off the run.
- 5.41 The provision and delivery of temporary facilities for the duration of the contract, whilst the main facilities are out of operation is agreed with the person in control of the premises during or prior to the pre-start meeting and arranged by the project lead.

Audits of works and enclosures

- 5.42 Audits of works and enclosures are important to ensure that works are being carried out to the recommended standards and according to the detail set down in the plan of work. Audits are carried out by the Asbestos Supplier, the LFB Health and Safety Team and the FM team. .

Post removal works – reassurance air testing

- 5.43 Where removal or remediation work is carried out that does not require an enclosure or 4 stage clearance, reassurance air tests will be arranged following completion of the works to confirm that the areas are safe for normal occupation.
- 5.44 Reassurance air tests are carried out by approved and independent air analysts accredited to UKAS and complying with ISO 17025.
- 5.45 The licensed removal contractor must ensure all certification is forwarded to the Asbestos Supplier upon completion of the works who will update the IMS.

Post-removal works - certificate of reoccupation

- 5.46 Where removal works have taken place within an enclosure, an independent analyst accredited to UKAS and complying with ISO 17025 is employed to assess the area to confirm the removal works have been completed to a satisfactory standard and the area is safe for reoccupation.
- 5.47 There are four stages to the site certification for reoccupation procedure.

- A preliminary check of the site condition and job completeness.
- A thorough visual inspection inside the enclosure/work area.
- Air monitoring.
- Final assessment post-enclosure/work area dismantling.

5.48 Once all four stages have been completed satisfactorily the analyst will issue a certificate of reoccupation.

5.49 The licensed removal contractor must ensure all certification is forwarded to the Asbestos Supplier upon completion of the works for the updating of records.

Disposal of asbestos waste

5.50 Asbestos waste, defined as containing more than 0.1% w/w asbestos in the waste, is subject to the waste management controls set out in the Hazardous Waste (England and Wales) Regulations 2005 (as amended).

5.51 As producers of hazardous waste, LFB have bulk registered all premises with the Environment Agency to receive unique premises codes. This code is provided to all asbestos removal contractors prior to the commencement of the works and is obtainable from the Asbestos Supplier.

5.52 Whenever hazardous waste is removed from any premises for disposal or recovery, a consignment note is completed to accompany the waste in accordance with the Hazardous Waste (England and Wales) Regulations 2005 (as amended).

5.53 The licensed removal contractor must ensure all certification is forwarded to the Asbestos Supplier upon completion of the works for the updating of records. Consignment notes for the removal of waste containing asbestos must be retained for 3 years.

6 Actions following the discovery of or damage to asbestos

6.1 This section relates to the discovery of a material suspected to be asbestos in LFC premises. This discovery may be in the normal operational running of the premises or as a result of project or maintenance work.

6.2 The action to take following discovery of actual or suspected asbestos materials that has been damaged, either through accidental impact, degradation or vandalism are illustrated using flow charts for ease of understanding. These are:

Discovery of suspect materials – undamaged

6.3 **Figure 3** describes the process to be followed following discovery of potential asbestos which is **undamaged**.

6.4 The flow chart details the role of the Bellrock LFB Property Portal extension 89100 option 2 in arranging sampling of the material and the communication of results.

6.5 The decision to remove, encapsulate or manage asbestos in-situ following positive sampling will be made by the Asbestos Supplier.

Discovery of suspect materials – damaged

6.6 **Figure 4** describes the process to be followed following damage to suspected asbestos.

6.7 The flow chart details the role of the Bellrock LFB Property Portal in arranging emergency samples and air tests to the area and the communication of results.

6.8 The recommendation /decision to remove, encapsulate or manage asbestos following positive sampling will be made by the Asbestos Supplier.

Reassurance air testing

- 6.9 Where there is concern of possible airborne fibre release from a known or suspected ACM, the Bellrock LFB Property Portal extension 89100 option 2 will arrange for reassurance air testing to be carried out by an independent air analyst accredited to UKAS and complying with ISO 17025.
- 6.10 Results of the air test will be communicated to all relevant parties.
- 6.11 The Asbestos Supplier will recommend the necessary course of action following receipt of results.

Suspected exposure to ACM

- 6.12 If exposure to ACM is suspected the procedures detailed in paragraphs 3.16 – 3.17 should be followed.

Lines of communication

- 6.13 **Figure 5** details the lines of communication to be followed in the event of an asbestos incident.

Reporting incidents outside normal office hours

- 6.14 **If the area is unoccupied and the incident does not affect persons or the operations of the premises;**

The area must be taken 'off the run' (OTR) immediately by the person in control of the premises and the area sealed. The person in control of the premises must contact the Bellrock LFB Property Portal extension 89100 option 2 who will arrange remediation action.

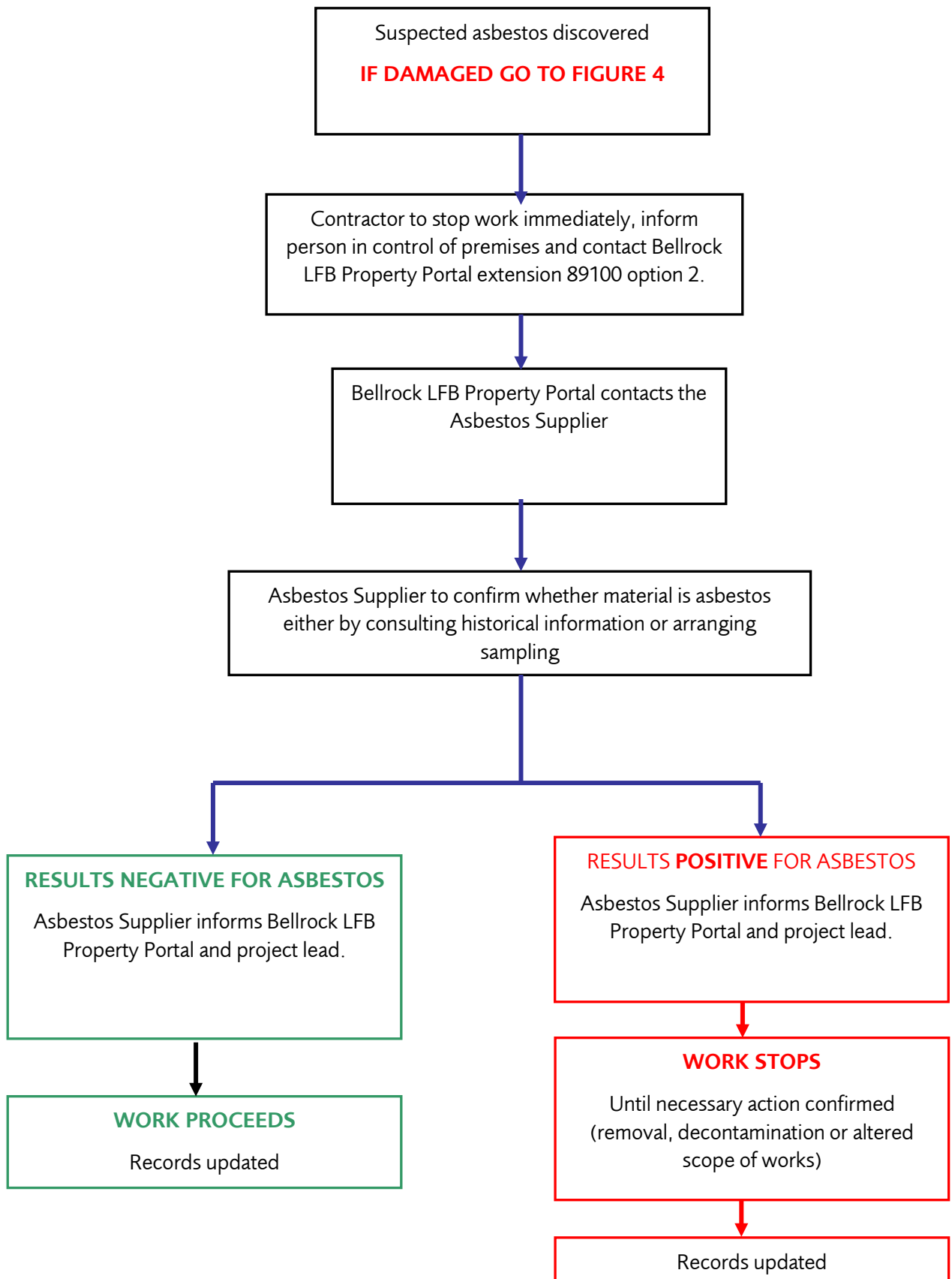
- 6.15 **If the incident affects persons or the operations of the premises:**

The area must be taken 'Off The Run' (OTR) immediately by the person in control of the premises and the area sealed.

The person in control of the premises must contact the Bellrock LFB Property Portal and the LFB Property Services Facilities Manager who will evaluate the situation and must immediately contact the Asbestos Supplier for advice using the out of hours numbers (if necessary) detailed in paragraph 2.3. The Asbestos Supplier will consult existing records and if necessary, arrange for sampling, air testing and remediation work to take place. The Asbestos Supplier will also advise on any further action required.

Figure 3

Procedure for discovery of suspected asbestos material



Procedure for damage to asbestos or suspected asbestos

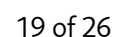
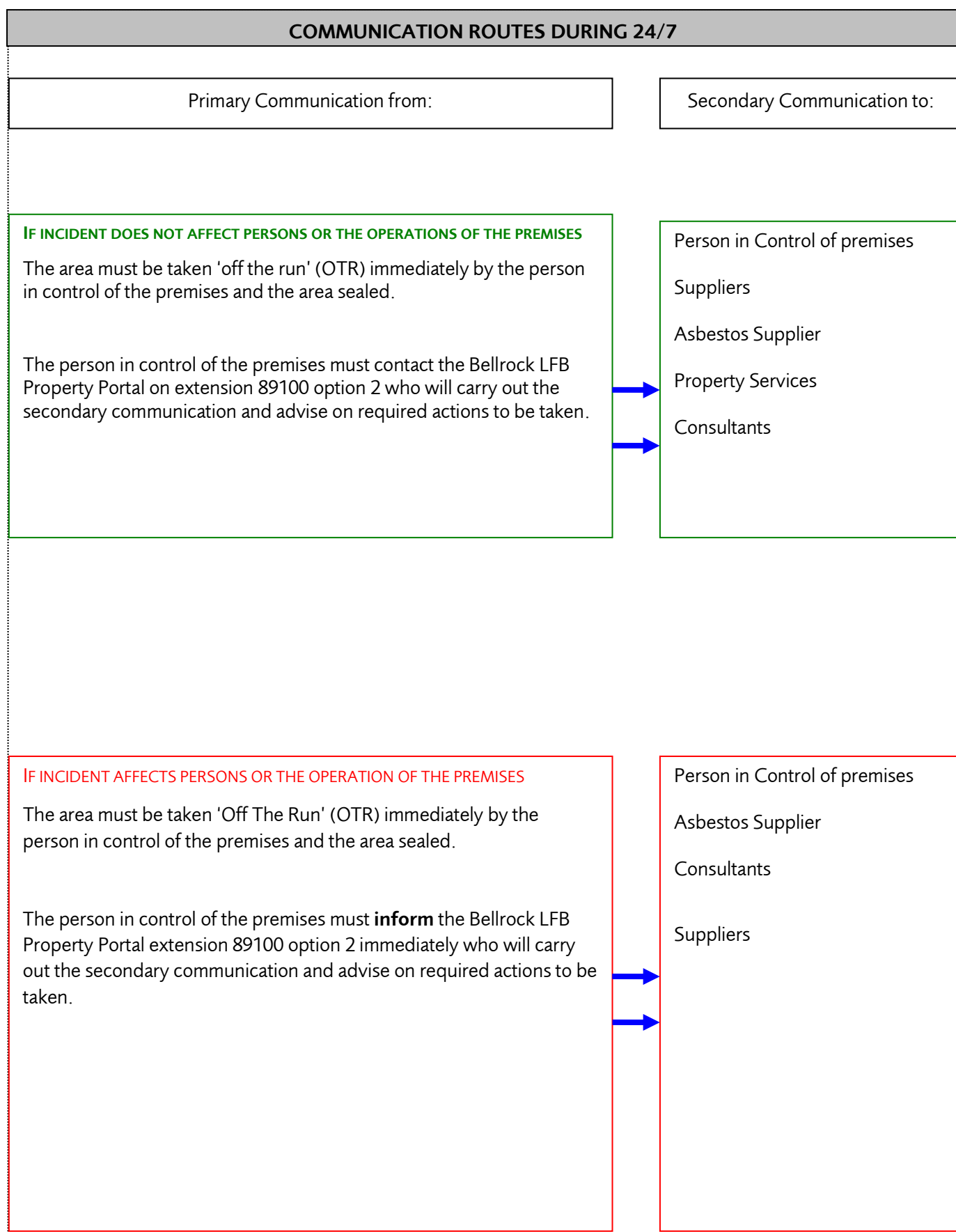


Figure 5

Communications procedure in the event of an asbestos incident



7 Training

- 7.1 LFC is committed to providing health and safety training to all employees which includes awareness training in the hazards and risks associated with asbestos containing materials. General awareness training is the responsibility of each department head to ensure that all their employees are aware of this policy and its contents as an integral part of managing a premises. Asbestos awareness training can be arranged through the Asbestos Supplier if required.
- 7.2 All employees with a documented role within the asbestos management process will receive specific training as necessary.
- 7.3 Further details of specific training can be found in the Asbestos Training Strategy for the Technical and Service Support Property Group.

8 Review of this policy and consultation

- 8.1 This asbestos policy will be periodically reviewed, and the following persons will be consulted:

Head of Technical and Assurance

020 8555 1200

Technical Compliance Manager

020 8555 1200

Head of Facilities Management

020 8555 1200

9 Legislation, regulations and guidance

Guidance

- 9.1 Since the first introduction of the Asbestos Prohibitions Regulations in 1985, the importation and use of all types of asbestos within the UK has gradually been banned with few specific exceptions. Work with and involving asbestos is now covered under a number of different pieces of legislation including, but not restricted to:
 - (a) **The Health and Safety at Work etc Act 1974** applies to all risks and requires employers to conduct their work in such a way that their employees will not be exposed to health and safety risks, and to provide information to other people about their workplace which might affect their health and safety. Section 3 of HSWA contains general duties on employers and the self-employed in respect of people other than their own employees. Section 4 contains general duties for anyone who has control, to any extent, over a workplace.
 - (b) **The Management of Health and Safety at Work Regulations 1999 (MHSW)** require employers and self-employed people to make an assessment of the risks to the health and safety of themselves, employees and people not in their employment arising out of or in connection with the conduct of their business - and to make appropriate arrangements for protecting those people's health and safety.
 - (c) **The Construction (Design and Management) Regulations 2015** require the client to pass on information about the state or condition of any premises (including the presence of hazardous materials such as asbestos) to other persons who may need it including where appointed the

Principal Designer or Principal Contractor before any work commences and to ensure that the health and safety file is available for inspection by any person who needs the information.

- (d) **The Workplace (Health Safety and Welfare) Regulations 1992** require employers to maintain workplace buildings so as to protect occupants and workers.
- (e) **The Control of Substances Hazardous to Health Regulations 2002 (COSHH)**. Asbestos is undoubtedly a substance hazardous to health, but the specific duties in CAWR (2006) cover compliance.
- (f) **HSG 264 Asbestos: The surveying Guide 2010 (first edition)** – standards for those carrying out or commissioning asbestos surveys
- (g) **ACoP L143: Managing and Working with Asbestos (Second edition) 2013**- applies to all work with asbestos and explains the requirements of the Control of Asbestos Regulations (2012).

CAR (2012) – Duty to manage

- 9.2 The Control of Asbestos Regulations (2012) requires employers to prevent the exposure of employees to asbestos. If this is not reasonably practicable, the law says their exposure must be controlled to the lowest possible level.
- 9.3 The duty to manage requires those in control of premises to:
 - Take reasonable steps to determine the location and condition of materials likely to contain asbestos.
 - Presume materials contain asbestos unless there is strong evidence that they do not.
 - Make and keep an up-to-date record of the location and condition of the ACMs or presumed ACMs in the premises.
 - Assess the risk of the likelihood of anyone being exposed to fibres from these materials.
 - Prepare a plan setting out how the risks from the materials are to be managed.
 - Take the necessary steps to put the plan into action.
 - Review and monitor the plan periodically.
 - Provide information on the location and condition of the materials to anyone who is liable to work on or disturb them.

Duty holders

- 9.4 All those who have responsibility for the maintenance and/or repair of non-domestic premises have duties under Regulation 4 (Duty to manage asbestos) of CAR (2012).
- 9.5 LFB will be the duty holder for all freehold premises and may also have responsibilities as landlord or tenant in some properties. The extent of the legal duty is determined by the terms of any tenancy agreement or contract that applies, and in the absence of any such agreement, on the degree of control the party has over the premises. In most cases the duty holder will be the party who has contractual responsibility for the maintenance and repair of that premises.

10 Reference information

Nature and hazard of asbestos

- 10.1 Asbestos is a term used for the fibrous forms of several naturally occurring silicate minerals. The fibres have high tensile strength and chemical, electrical and heat resistance which mean asbestos containing materials (ACMs) have been used extensively in building products such as roofing, cladding, thermal insulation and fire-resistant internal panelling. Millions of tonnes of asbestos materials have been imported into the UK since 1880, of which the largest proportions have been used in building products. The three main types of asbestos used commercially are:

- Crocidolite (often referred to as 'blue asbestos').
- Amosite (often referred to as 'brown asbestos').
- Chrysotile (often referred to as 'white asbestos').

In addition, there are 3 less commonly used forms of asbestos:

- Actinolite.
- Anthrophyllite.
- Tremolite.

- 10.2 Other forms of asbestos are also found but are much less common. Different types of asbestos present different levels of risk, those fibres in the amphibole group (including blue and brown) present a higher risk than the serpentine group (white asbestos). It is useful to remember that the colours are not a reliable indicator of the type of asbestos used. In the manufacturing of materials, the raw asbestos is mixed with various other materials and frequently with more than one type of asbestos, this often makes laboratory analysis the only way to identify the type of asbestos used.
- 10.3 Although asbestos is a hazardous material it can only pose a risk to health if the fibres become airborne and are then inhaled. Therefore, the risks related to asbestos are low unless the material becomes disturbed. Breathing in asbestos fibres can lead to people developing a range of diseases, some of which are fatal; these include asbestosis, lung cancer and mesothelioma.
- 10.4 The risk of developing an asbestos-related disease depends on a number of factors including the cumulative dose received, the time since first exposure and the type and size of asbestos fibres concerned.

11 Affected policies

- 11.1 Policy number 532 - Asbestos management plan for the control of asbestos in LFC premises has been replaced by this policy and is hereby cancelled.

Appendix 1 - Exposure to asbestos recording form

Non-operational asbestos exposure record form personal file record.

Name..... Workplace.....

Pay No..... Job title.....

1. Details of exposure

Date of exposure.....

Description of exposure.....

.....

.....

Address where exposure occurred.....

.....

Exact location.....

Duration of exposure.....

Activity at the time of exposure.....

Type of protective clothing/equipment worn at the time of exposure

.....

2. Form of asbestos involved (delete as necessary)

Lagging
Sprayed coating
Insulation Board
Cement

Type of asbestos (if known) (delete as necessary)

Blue (Crocidolite)
Brown (Amosite)
White (chrysotile)
Other

Level of communication – air readings (if known)

Results:

Date of sampling..... Sampling agency.....

3. Line manager/ Head of section

Signature..... Rank/Grade..... Date.....

(This form to be sent to Corporate Health, Safety & Environmental Services immediately for incorporation into the individuals Personal Record File).

This form can be found on the health and safety web site. From Hotwire favourites go to Health and Safety >> A – Z index >> A >> Asbestos exposure record form.

Appendix 2 - Version control document

Title:	LFB Asbestos Management Plan
Document Ref:	
Location of stored file:	
Owner:	LFB Property
Address:	169 Union Street, London SE1 0LL
Telephone No:	020 8555 1200
Issue Date:	January 2010
Programmed Review Date:	January 2026
Version:	Draft 0.1

Revision No.	Note	Date
0.8	Updated with new FM supplier details and made minor grammar changes.	15/01/2025
0.7	Throughout. Minor changes.	04/06/2021
0.6	Updated regulations, removal of Authority and updated with points of contact	April 2019
0.5	Updated with new guidance and regulations and revised roles and responsibilities	January 2013
0.4	Updated with improved flow diagrams and reporting of asbestos exposure information.	January 2010
0.3	Updated with new lines of communication and indexed	September 2007
0.2	Updated with new 2006 regulations	February 2007
0.1	Draft produced and circulated	November 2005

Document history

Assessments

An equality, sustainability or health, safety and welfare impact assessment and/or a risk assessment was last completed on:

EIA	14/01/25	SDIA	H - 21/08/24	HSWIA	28/10/24	RA	NA
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Audit trail

Listed below is a brief audit trail, detailing amendments made to this policy/procedure.

Page/para nos.	Brief description of change	Date
Throughout	Minor terminology amendments made throughout please read to familiarise yourself with the changes.	24/11/2020
Throughout	Reviewed as current with minor changes.	07/06/2021
Throughout	Reviewed as current with minor changes.	16/01/2025
Page 4 Page 7, para 3.14 Page 8, para 3.15 Page 19	Asbestos Supplier – Address update following office move. Signage to be added to restrict access. Asbestos Tracker to be issued to technical assurance manager. Figure 4 – Box 2 updated to show signage to be added to restrict access.	05/08/2026

Subject list

You can find this policy under the following subjects.

Asbestos	Property

Freedom of Information Act exemptions

This policy/procedure has been securely marked due to:

Considered by: (responsible work team)	FOIA exemption	Security marking classification