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Policy for

Asbestos Management

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| Prepared by: | Shared with schools |
| KDS          | <b>Autumn 2025</b>  |

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## Statement of intent

All AET policies are written to support our schools and communities. We do this by ensuring they are always in line with our Colleague Values:



Applying these values to everything we do means always acting with integrity, in the interests of others, being honest, open and transparent and putting the safety of our children first.

**The Aspire Educational Trust** understands that, as a proprietor and employer, the overall management of health and safety in all central trust buildings and the buildings of all constituent academies within the trust is ultimately the responsibility of the board of trustees / central team. The board of trustees / central team recognises that any asbestos found in any trust buildings must be managed properly, because the health and wellbeing of our pupils, staff and visitors is of the utmost importance.

This policy abides by the law stated in the Control of Asbestos Regulations 2012 and the Health and Safety at Work etc Act 1974. If there is an incident of asbestos exposure in any of our buildings, the trust will take the necessary steps to ensure that everyone is safe and, unless the incident is minor, will report it to the HSE.

## 1. Legal framework

This policy has due regard to legislation and guidance including, but not limited to, the following:

- The Control of Asbestos Regulations 2012
- Health and Safety at Work etc Act 1974
- The Hazardous Waste (England and Wales) Regulations 2005
- The Control of Substances Hazardous to Health Regulations 2002
- Environmental Protection Act 1990
- The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013
- The Safety Representatives and Safety Committees Regulations 1977
- The Health and Safety (Consultation with Employees) Regulations 1996
- The Construction (Design and Management) Regulations 2015
- The Management of Health and Safety at Work Regulations 1992
- DfE (2024) 'Managing asbestos in your school or college'
- DfE (2024) 'Good estate management for schools'

This policy operates in conjunction with the following school policies:

- Asbestos Management Plan
- Health and Safety Policy

## 2. Roles and responsibilities

The duty holder for asbestos in **The Aspire Educational Trust** is the board of trustees / central team.

The board of trustees / central team is responsible for:

- The overall management of health and safety in its academies, including asbestos management.
- Ensuring that the principal/headteacher of each constituent academy of the trust has been appointed to be responsible for the day-to-day management of asbestos in their individual school.
- Ensuring that all staff with delegated responsibilities for health and safety and premises management are appropriately trained to manage asbestos incidents.
- Ensuring that the **annual** health and safety training undergone by all staff covers asbestos and the importance of being aware of the risk.
- Regularly monitoring the effectiveness of the arrangements to control asbestos risk.
- Engaging with unions on the effective management of asbestos.
- Conducting management surveys for all trust buildings.

The principal/headteacher of each constituent academy is responsible for:

- The day-to-day management of health and safety issues such as asbestos in their individual academy.
- Liaising with the board of trustees / central team on the arrangements in place for managing the risk of asbestos.

- Keeping the board of trustees / central team up-to-date with asbestos management practices and the level of asbestos risk.
- Informing the board of trustees / central team in the event that any asbestos-containing materials (ACMs) are disturbed.
- Providing information about the presence of asbestos and the management arrangements in place to parents.
- Informing those affected by the disturbance of ACMs and the release of asbestos fibres.

The SMO/Maintenance staff at each school are responsible for:

- Undergoing training to understand what precautions to follow in respect of asbestos and what to do if ACMs are disturbed – maintenance and cleaning staff will be responsible for undergoing additional training in respect of the increased risk of disturbing ACMs associated with their roles.
- Reporting where they have disturbed ACMs or have witnessed ACMs being disturbed to the principal/headteacher of their academy, or to the chair of trustees where they are central trust staff.
- Adhering to the procedures outlined in this policy.

Commented [RS1]: Do all staff need to do this or should we change this section to the SMO/Maintenance staff?

### 3. Management survey of asbestos containing materials (ACMs)

#### Step 1: Conducting a management survey of asbestos-containing materials (ACMs)

The school will carry out an asbestos management survey which records the location and condition of the asbestos in all school buildings constructed before 2000. The survey will be conducted in accordance with the HSE's asbestos survey guide and by a United Kingdom Accreditation Service (UKAS) accredited surveying organisation.

The management survey will:

- Establish the location, type and condition of ACMs.
- Provide a current and accurate picture of the presence and condition of ACMs within accessible areas.
- Include the material assessment score or category.
- Identify the inaccessible areas within buildings where the presence of asbestos is presumed or cannot be ruled out.
- Include representative photographs to make it easier to measure any damage or deterioration to ACMs.

The survey will be done for all buildings constructed before 2000, including new buildings with residual elements and equipment of pre-2000 buildings.

The areas inspected as part of the management survey will include:

- Underfloor coverings.
- Above false ceilings.
- Lofts.
- Inside risers.
- Service ducts and lift shafts.

- Basements.
- Cellars.
- Underground rooms.
- Undercrofts.

Following the survey, a plan will be developed which brings together all the available and relevant information. It will set out what is going to be done, when it is going to be done, and how it is going to be done, both for any remedial work and for ongoing management action, e.g. periodic checks.

The management survey will be reviewed regularly to ensure that it is adequate and remains current.

When maintenance or construction work is taking place, the school will assess whether a refurbishment or demolition survey is required.

### **Step 2: Assessing the risks associated with ACMs**

Once the management survey has been completed, the school will work with the asbestos surveyor to assess the risks associated with each occurrence of asbestos. The assessment will include three parts:

- **'Material' assessment** – this is provided within the survey and is an assessment of each item of asbestos material identified based upon the type of material, the type of asbestos it contains, its surface treatment and the extent of damage.
- **'Priority' assessment** – this is the assessment of the likelihood of someone disturbing the material based upon factors such as the number and type (e.g. pupils) of people using the room, the time they spend in the room, the location, the accessibility and extent of the asbestos, and the frequency and type of activity that might disturb it.
- **'Total' assessment** – the 'material' and 'priority' assessments will be combined to give a total risk assessment.

### **Step 3: Devising a plan for managing ACMs**

The school will create an Asbestos Management Plan, which will include the following information:

- The leadership statement on ownership of the risk and training arrangements for staff, including clear roles of specific individuals, the type of training undertaken and by whom, and the dates training was undertaken
- Plans for any necessary work identified from the risk assessment, both for any remedial work and for ongoing management actions
- The asbestos register, which brings together all the available and relevant information, including pictures
- Ongoing arrangements to monitor and record the condition of ACMs
- Arrangements for actively managing the potential risk from presumed or 'hidden' asbestos
- Procedures for controlling routine maintenance work undertaken at the school

- Arrangements for the management of any construction or maintenance work – this should identify the checks to ensure that the correct controls and that competent HSE-licenced contractors are used
- Emergency procedures to be actioned in the event of inadvertent disturbance of ACMs both within and outside the normal opening hours
- Communication arrangements for sharing the plan with staff and visitors (anyone who is liable to disturb asbestos materials as identified through a risk assessment)
- The reporting and escalation procedures where any damaged asbestos is noted
- Governance arrangements, including:
  - Nomination of those who can make entries or amendments to the plan
  - The formal arrangements for reviewing and updating the plan
  - The location of all asbestos-related documentation, as well as back-up and business continuity arrangements

The school will ensure its management arrangements are effective during school closure periods, such as after school hours and during community use when school staff presence is minimal.

The Asbestos Management Plan is a live document and will be reviewed and updated when necessary, via SMARTLog.

Commented [RS2]: I assume these plans happen - will they go on SMARTLog?

#### **Step 4: Ensuring staff and visitors know the risks and precautions that need to be taken**

Those with explicit asbestos responsibility will be given suitable asbestos training and time to carry out the associated work alongside their existing obligations. Deputies will also be assigned to avoid situations where there are no responsible staff on site at the time of an incident or query about ACMs.

The school will ensure that anyone who is liable to disturb asbestos during their work, or who supervises such staff members, receives the correct level of information, instruction and training to enable them to carry out their work safely and competently without risk to themselves or others.

All staff members will be informed:

- About the specific locations of ACMs in the rooms or areas they use and to avoid work that may disturb them.
- What to do in the event of accidental damage to ACMs.

The school has plans in place to ensure that if emergency services request information about the asbestos that is present in the school, information will be provided to help keep emergency service workers safe.

#### **Step 5: Keeping the management of ACMs under review**

The school will update its Asbestos Management Plan and asbestos register as circumstances change, and at least annually. Following reviews, the school will address any identified changes or areas for improvements and communicate any changes to all staff.

The Asbestos Management Plan will confirm that:

- All responsible staff remain aware of their duties and their training is up to date.
- Regular inspections of ACMs are taking place.
- Contact details for people and organisations are up to date.
- All arrangements detailed in the plan are current, relevant and proving effective.

The Asbestos Management Plan will also be updated if:

- There are changes in the identified responsible people or organisations.
- New information is received, e.g. from 'refurbishment and demolition' surveys.
- Work is undertaken on ACMs.
- ACMs are removed, or any damage or deterioration to them is noticed.
- Significant building works are undertaken which might confuse the documented location of ACMs.

#### **4. Risk assessment**

The board of trustees / central team and principals/SMO will work with the surveying organisation to assess the level of risk tied to each identified occurrence of asbestos.

As part of the management survey, the surveying organisation will conduct a 'material' assessment which will assess each item of ACM identified in terms of the type of material, the type of asbestos it contains, its surface treatment and the extent of damage.

The board of trustees / central team will support principals/headteachers in conducting a 'priority' assessment to determine the likelihood of ACMs being disturbed. This assessment will be based upon:

- The number of people using the room containing ACMs.
- The amount of time generally spent in the room.
- The risks that the age group of any pupils with access to the room may pose to the integrity of ACMs.
- The location, accessibility and extent of the asbestos.
- The frequency and type of activity that might disturb the ACMs.

Principals will report the results of the priority assessment to the board of trustees / central team, who will combine the material and priority assessments to form the 'total' assessment which will provide the foundation for an Asbestos Management Plan.

#### **5. The asbestos register**

The asbestos register is formed by the combination of the asbestos location register and the asbestos risk assessment to offer an overall picture. The register will include:

- Drawings and photographs, where relevant.
- The location, accessibility, extent and condition of the ACMs.
- The forms and material types of ACMs.

- What the ACMs look like.
- The associated risk assessment of ACMs.
- A clear indication of parts of the building where the presence of ACMs is presumed.
- Any areas which were not captured within the management survey and where the presence of asbestos cannot be ruled out – these areas will undergo a further survey ahead of access.

Principals/SMO will update the asbestos register periodically to reflect the current status of the ACMs within the buildings. Where further asbestos materials have been identified or removed during refurbishment work, this will be recorded.

The asbestos register for each academy will be reviewed **annually** by that academy's principal and any changes will be communicated to all relevant staff.

The board of trustees / central team will ensure that it maintains up-to-date copies of the asbestos registers for each academy.

## 6. Asbestos Management Plan

Principals/Headteachers and representatives from the board of trustees / central team will work together to develop an Asbestos Management Plan for each constituent academy to set out the day-to-day management arrangements for controlling the risks from ACMs during regular activities on the premises. Headteachers will brief all staff on the contents of the plan, and will ensure that maintenance and cleaning staff are particularly aware of its contents.

The board of trustees / central team will ensure that the Asbestos Management Plan assumes that ACMs are present around structural columns and beneath casings and claddings, unless they know for certain this is not the case. Where there is any uncertainty about the level of risk from presumed or 'hidden' asbestos, the board of trustees / central team will secure professional advice and follow all relevant HSE guidance.

Each Asbestos Management Plan will include the following information as it pertains to the individual academy:

- The leadership statement on ownership of the risk and training arrangements for staff, including clear roles of specific individuals, the type of training undertaken and by whom, and the dates training was undertaken
- Plans for any necessary work identified from the risk assessment, both for any remedial work and for ongoing management actions
- The asbestos register, which brings together all the available and relevant information, including pictures
- Ongoing arrangements to monitor and record the condition of ACMs
- Arrangements for actively managing the potential risk from presumed or hidden asbestos
- Procedures for controlling routine maintenance work undertaken at the school
- Arrangements for the management of any construction or maintenance work – this should identify the checks to ensure that the correct controls and that competent HSE-licenced contractors are used

- Emergency procedures to be actioned in the event of inadvertent disturbance of ACMs both within and outside the normal opening hours
- Communication arrangements for sharing the plan with staff and visitors (anyone who is liable to disturb asbestos materials as identified through a risk assessment)
- The reporting and escalation procedures where any damaged asbestos is noted
- Governance arrangements, including:
  - Nomination of those who can make entries or amendments to the plan
  - The formal arrangements for reviewing and updating the plan
  - The location of all asbestos-related documentation, as well as back-up and business continuity arrangements

The AET central Team as a whole will review and approve each Asbestos Management Plan. It will also ensure that management arrangements across the trust are effective during school closure periods when staff presence is minimal.

Each academy will update its Asbestos Management Plan and asbestos register as circumstances change. Principals will liaise closely with the board of trustees / central team through any reviews and will work with the board of trustees / central team to address any identified changes or areas for improvements. Principals/Headteachers will be responsible for communicating any changes to staff.

The Asbestos Management Plan will also be updated if:

- There are changes in the identified responsible people or organisations.
- New information is received, e.g. from 'refurbishment and demolition' surveys.
- Work is undertaken on ACMs.
- Damage to asbestos areas occurs.
- ACMs are removed.
- Significant building works are undertaken which might complicate the documented location of ACMs.

Further information about each constituent academy's management arrangements can be found in that academy's Asbestos Management Plan.

## **7. Building and maintenance work**

Any building and maintenance work planned on any of the trust buildings will first be approved by the board of trustees / central team. If concerns arise that building and maintenance work may disturb hidden ACMs, the board of trustees / central team will arrange for a refurbishment and demolition survey to be carried out in the area where the work is set to take place. Due to the intrusive nature of this survey, it will be carried out under controlled conditions. These surveys will be passed on to those who will eventually take on the work.

Small, short duration tasks may be carried out by non-licensed workers, provided that they have the appropriate information, instruction and training, and the correct measures are taken. Higher risk work, such as the removal of asbestos, will be completed by a contractor licensed by the HSE. The school may need to notify the HSE of some types of non-licensed work.

Once work is appropriately authorised, contractors will be prepared for the unexpected presence of ACMs. If further ACMs or suspect materials are uncovered, the work will stop, the area made safe, and the work reassessed before continuing.

Asbestos-containing waste will be properly contained and disposed of in accordance with the Hazardous Waste Regulations 2005, and the school's Health and Safety Policy. Where the work has been contracted out, disposal is the responsibility of the contractor, although the board of trustees / central team will have responsibility for obtaining a waste consignment note to confirm that the asbestos was appropriately disposed of.

Principals/SMO will ensure that all staff and other stakeholders are informed of the proposed works. The board of trustees / central team will consult with union health and safety representatives in a timely manner on matters relating to the planned work.

## **8. Asbestos-related incidents**

If anyone within the trust finds that there has been, or may have been, an unplanned disturbance of asbestos, the following action will be taken:

- All activities will stop and everyone will be evacuated from the affected area
- The board of trustees / central team will be notified immediately, even if the incident is minor
- Staff, pupils and visitors will not be allowed to re-enter the affected areas until any necessary remedial action has been taken
- Items, including equipment, books, or personal belongings, will not be moved from the area
- Staff, pupils, parents and visitors will be given relevant information to understand the risks and advised to consult their doctor
- Advice will be sought from an asbestos expert regarding remedial action
- Unless the incident is minor, the board of trustees / central team will notify the HSE, as this is a legal requirement under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013
- Contractors will follow their own procedures to deal with the unintended or unexpected release of asbestos
- Anyone who has come into contact with asbestos, and is concerned about their exposure, will be advised to contact their GP

The school's Asbestos Management Plan will detail the procedures for staff to follow in the event of an incident, and this will be communicated to all staff.

## **9. Communication and training**

The board of trustees / central team will inform staff, volunteers and other stakeholders of all locations of ACMs and how they could be damaged and disturbed. The board of trustees / central team will ensure that all these people receive the correct information, instructions and training, and will be clear in what precautions to take.

The board of trustees / central team will have plans in place to ensure that if emergency services request information about the asbestos that is present in any trust buildings, information will be provided to help keep emergency service workers safe.