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Managing asbestos in your school or college

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Day-to-day management of asbestos in schools or colleges

Steps to take to meet the core requirements for day-to-day asbestos management in your school or college.

There are 5 steps to take in meeting the core requirement for day-to-day asbestos management in your school or college:

1. A management survey undertaken by appropriate professionals indicating the location and type of identified occurrences of asbestos should be recorded in an asbestos location register.
2. An assessment of the risks posed by each identified occurrence of asbestos.
3. A plan for actively managing and reviewing the risk from asbestos in your school or college – the asbestos management plan (AMP).
4. Arrangements to ensure that all staff (teaching and non-teaching) are aware of asbestos documents and management plans and have appropriate training.
5. Regular review of the AMP and asbestos location register including associated remedial actions.

You should implement further measures if maintenance or construction work is taking place, which may disturb the fabric of the building. Further details are in the asbestos management during maintenance or building works (<https://www.gov.uk/guidance/asbestos-management-in-schools/asbestos-management-during-maintenance-or-building-works>) section.

Step 1: Conduct a management survey of asbestos materials

Each school or college must have an up-to-date survey of the buildings to identify the presence of asbestos materials, unless all the structures on site were wholly constructed since the year 2000. The survey should:

- establish the location, type and condition of asbestos materials
- provide a current and accurate picture of the presence and condition of asbestos materials within accessible areas

- 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 asbestos materials

A management survey is the standard survey. The survey should be conducted in accordance with HSE's survey guide, HSG264 and undertaken by an accredited or certificated surveyor.

Select an organisation accredited by the United Kingdom Accreditation Service (UKAS). The survey should include the material assessment score or category (high, medium, low or very low).

You need to do this for all structures constructed before 2000, including new buildings with residual elements of pre-2000 buildings. The information collected within the survey should then be used to produce an asbestos register. The register should include building diagrams showing the asbestos material locations.

Some parts of school or college buildings will be largely inaccessible for the purposes of conducting a management survey (for example, behind fixed panels or in roof voids). These should be clearly indicated on the survey. The survey should also indicate areas of 'presumed' asbestos where it is likely that asbestos is hidden. Recommendations should be made for the management of any inaccessible or hidden asbestos. The requirement to include these aspects must be included in the instruction to the asbestos surveyor.

This is especially true of system buildings and columns, as detailed in the managing asbestos in system built schools guidance (<https://www.hse.gov.uk/services/education/summary-report.pdf>).

System buildings typically:

- are prefabricated timber or light weight steel framed buildings, although they are sometimes concrete
- have flat roofs
- were constructed in the late 1940s to the early 1980s

Consideration must be given to those asbestos materials which are hidden within the structure of the building. They may include asbestos under floors, above ceilings and within walls and columns.

A management survey is only suitable for managing asbestos during the normal occupation and use of your school or college. When maintenance or construction work is taking place, a refurbishment or demolition survey may be required. See asbestos management during maintenance or building works (<https://www.gov.uk/guidance/asbestos-management-in-schools/asbestos-management-during-maintenance-or-building-works>) for the requirements in these cases.

When commissioning a survey, schools and colleges may find it helpful to arrange for the surveyor to meet staff to brief them on the survey once it is completed, advise them on the risks presented by the materials and how they should be managed. These meetings can be included within the surveyor's terms of appointment.

If any occurrence of asbestos is deemed high-risk, the surveyor may recommend removal. In these cases, the dutyholder should not ignore these recommendations.

Schools and colleges that already have a survey(s) should review their current document(s) to ensure they are adequate and remain current. Some review questions may include:

- was the survey undertaken by a suitably qualified UKAS accredited surveyor?
- does the survey cover all relevant buildings/structures associated with the school/college and include all areas which are considered as accessible?
- is the survey coherent and complete? All information relating to asbestos should be held together, clearly understandable, and any gaps in the information should be understood and filled, where possible
- does the survey include details of hidden asbestos particularly if the building is a system building? (A description of system buildings is included in a box within step 1
- does the survey clearly identify any areas that were not surveyed and why? What are the implications of this? Are any other limitations or caveats within the survey considered and planned for?
- does the survey clearly identify the location (including accessibility), quantity, type and condition of the asbestos materials identified and what they look like?
- does the survey clearly identify genuinely inaccessible areas where the presence of asbestos is foreseeable or cannot be ruled out and as such must be presumed?
- is the survey document regularly updated or annotated to accurately reflect the current locations and condition of the asbestos materials?
- does the survey remain a current and relevant basis for risk management arrangements?

Case study 1: understanding survey limitations

Recent interventions in schools by the HSE found that some schools did not understand the limitations of the surveys that had been undertaken. In one case the school had failed to recognise that the management survey did not extend to include the void above the ceilings, yet had undertaken work within the ceiling voids. An additional survey should have been commissioned prior to the start of any intrusive works above the ceilings.

Key resources

Further information on management surveys can be found in:

- HSE guidance on management surveys (<https://www.hse.gov.uk/asbestos/managing/survey-manage.htm>)
- guidance on refurbishment/demolition surveys (<https://www.hse.gov.uk/asbestos/managing/survey-refurb.htm>)
- HSE's asbestos in system buildings (<https://www.hse.gov.uk/services/education/asbestos-system-buildings.pdf>)
- the United Kingdom Accreditation Service (UKAS) (<https://www.ukas.com/>)

Step 2: Assess the risks associated with asbestos materials in your school or college

Once the management survey is complete, the school or college must work with the asbestos surveyor to assess the risk associated with each identified occurrence of easily accessible and presumed asbestos. This is detailed in [HSE's guidance a comprehensive guide to managing asbestos in premises \(https://www.hse.gov.uk/pubns/priced/hsg227.pdf\)](https://www.hse.gov.uk/pubns/priced/hsg227.pdf) (HSG 227 – refer to appendices 3 and 4).

The assessment has 3 parts.

Requirement	Responsibility
<p>'Material' assessment – this is usually provided within the survey and is an assessment of each item of asbestos material identified based upon the type of material, the type of asbestos it contains, its surface treatment and the extent of damage. For 'hidden' asbestos, or asbestos which is 'presumed', the material should be assumed to be Crocidolite or Amosite (blue or brown asbestos), the more dangerous types.</p>	<p>The survey provider should include this for every instance of asbestos-containing material identified.</p>
<p>'Priority' assessment – this is your assessment of the likelihood of someone disturbing the material based upon factors such as the number and type (for example, children) of people using the room, the time they spend in the room, the location, accessibility and extent of the asbestos and the frequency and type of activity that might disturb it. This should include everyday activities and any risks of unusual activities which might disturb it, so it is crucial that staff are encouraged to report any disturbance in their work areas.</p>	<p>This should be undertaken by the school or college, supported by the surveying organisation and possibly the employer.</p>
<p>'Total' assessment – the material and priority assessments are combined to give the total risk assessment. This allows a comparison to be made of the risk presented by each item of asbestos materials in the building so that priorities can be set, and plans made for managing the asbestos materials. The HSE offers an example scoring system (algorithm) for the material and priority assessment contributions to the total risk assessment. Refer to appendices 2, 3 and 4 in a comprehensive guide to managing asbestos in premises (https://www.hse.gov.uk/pubns/priced/hsg227.pdf).</p>	<p>This combines the above 2 assessments and dictates the AMP requirement.</p>

The asbestos register

The asbestos register is formed by the combination of the asbestos location register (step 1) and the risk assessment (step 2) to offer an overall picture. This should include:

- drawings and photographs where relevant
- the location, accessibility, extent and condition of the asbestos materials
- the forms and material types of asbestos materials
- what the asbestos materials look like

- the associated risk assessment of asbestos materials
- a clear indication of parts of the building where the presence of asbestos materials 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 need to undergo a further survey ahead of access

You should update the asbestos register periodically to reflect the current status of the asbestos materials within the buildings. You should record where further asbestos materials have been identified or removed during refurbishment work.

Where asbestos materials are in good condition, well protected and unlikely to be damaged or disturbed, they may be left in place and managed, provided they are regularly monitored, and the situation reassessed if conditions change. A change of circumstances, such as change of building use, will also require a review of the assessment. If any asbestos materials are in poor condition, insufficiently encapsulated or at risk of being damaged or disturbed, seek professional advice regarding necessary remedial works. In the case of schools, any asbestos materials remaining within accessible areas should be encapsulated, protected or be in a safe position to reduce the likelihood of damage.

HSE's 3 worked examples of priority assessment algorithms for a primary school in a comprehensive guide to managing asbestos in premises (<https://www.hse.gov.uk/pubns/priced/hsg227.pdf>) contain further guidance on:

- how you should consider the presence of children as part of your priority assessment
- priority and material assessments
- how to prioritise management action

Key resources

Further information on assessing the associated risks can be found in:

- example scoring system (<https://www.hse.gov.uk/asbestos/assets/docs/materials-priority-scoring.pdf>)
- Managing my asbestos (<https://www.hse.gov.uk/asbestos/managing/intro.htm>), a step-by-step guide produced by HSE
- HSG227 a comprehensive guide to managing asbestos in premises (<https://www.hse.gov.uk/pubns/priced/hsg227.pdf>) - appendices 2, 3 and 4

Step 3: Prepare an asbestos management plan

A current AMP is essential to safe management of asbestos. The plan should set out your day-to-day management arrangements for controlling the risks from asbestos materials during normal and foreseeable activities in the premises.

The asbestos register (steps 1 and 2) information should be included in the AMP. The register and AMP should be shared with relevant safety representatives and all staff, particularly maintenance and cleaning staff.

Your AMP can be written or held as a computer-based record and should be readily accessible. Further information is available in HSE's managing asbestos in buildings: a brief guide (<https://www.hse.gov.uk/pubns/indg223.pdf>).

The **AMP** should include:

- the leadership statement on ownership of the risk and training arrangements for staff, including clear roles of specific individuals
- 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
- ongoing arrangements to monitor and record the condition of asbestos materials
- arrangements for actively managing the potential risk from presumed or ‘hidden’ asbestos
- procedures for controlling routine maintenance work undertaken at the school or college
- 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 asbestos-containing materials both within and outside the normal opening hours (see further guidance below on ‘What to do if things go wrong’)
- 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
- **AMP** governance arrangements including
 - nomination of those who can make entries to or amendments to the **AMP**
 - the formal arrangements for reviewing and updating the **AMP**
 - the location of all asbestos related documentation as well as back up and business continuity arrangements

Arrangements for the management of asbestos in system building blocks

Dutyholders, appointed persons and staff should be aware of **HSE**’s guidance on managing asbestos in system buildings with asbestos clad columns.

Dutyholders of system buildings should assume that asbestos materials are present around structural columns and beneath casings and claddings, unless they know for certain that no asbestos materials are present.

Dutyholders should also be aware that similar asbestos protection may have been afforded to steel columns incorporated into traditionally built schools of the time. Those with asbestos clad columns should follow the checklist in annex 2.

This hidden and presumed asbestos may be visibly disturbed by maintenance and renovation activities but may also be unknowingly disturbed by:

- everyday school activities
- significant air movements
- flooding
- water ingress

- weathering

Dutyholders should therefore always seek professional advice about the level of the potential risk from presumed or hidden asbestos and follow the 2008 HSE guidance for dutyholders of system buildings. Your management arrangements must consider all parties who may use the buildings. They should also be effective for community use during school or college closure periods, when staff presence is minimal or absent.

Case study 2: the importance of understanding who has responsibility for managing asbestos

Concerns were identified during some HSE inspections as to a lack of clarity about the responsibilities associated with the management of asbestos. In some cases, this shortfall meant that known asbestos-containing materials were not being monitored to identify any damage or deterioration in condition, which could lead to a risk of exposure. Shortfalls were also identified in respect of the employer's wider monitoring to validate that the arrangements set out in the AMP were in place.

Key resources

Further information on AMPs can be found in:

- managing asbestos in buildings (<https://www.hse.gov.uk/pubns/indg223.pdf>)
- writing an asbestos management plan (<https://www.hse.gov.uk/asbestos/managing/write.htm>)
- managing asbestos in system buildings (<https://www.hse.gov.uk/services/education/asbestos-system-buildings.pdf>)

Step 4: Communication and training arrangements

Those with explicit asbestos responsibility

This will include the employer, dutyholder and any appointed persons. It is important that these persons are given suitable asbestos training and time to carry out the associated work alongside their existing obligations. There should also be business continuity deputies for those with responsibility, to avoid situations where there are no responsible staff on site at the time of a possible incident or query about asbestos materials.

School and college staff

A wider duty under the Control of Asbestos Regulations 2012 (CAR), Reg 10, requires employers to make sure that anyone liable to disturb asbestos during their work, or who supervises such employees, receives the correct level of information, instruction and training to enable them to carry out their work safely and competently and without risk to themselves or others. This will include agency, catering, premises and maintenance staff and should include every member of staff or voluntary supporter.

Most school or college staff are not directly involved in managing the buildings. They will however need to know the location of any asbestos materials and how they can be damaged or disturbed, particularly when asbestos materials are easily accessible. You must on a regular basis instruct all staff to report damage or deterioration of fixtures or fittings that could lead to the release of asbestos fibres.

Contractors and those undertaking work in a school or college

It is essential to train contractors and communicate information about asbestos materials which may be disturbed. See section on asbestos management during maintenance or building works (<https://www.gov.uk/guidance/asbestos-management-in-schools/asbestos-management-during-maintenance-or-building-works>).

Parents, carers and visitors

The **AMP** should clearly set out the information made available to parents, carers and other visitors (who are liable to disturb asbestos materials as identified through a risk assessment). Consider the controls in place for any out-of-hours or community use of the buildings.

Emergency services

Dutyholders should make information about the location and condition of any asbestos or suspected asbestos available to the emergency services. You should record in your **AMP** how this will be done. Conventionally, this will be achieved by the provision of an up-to-date copy of the asbestos register. In an emergency, you will need access to this information without having access to the building.

The public

Schools and colleges should agree their policy on sharing information with the general public and possibly include this within their **AMP**.

Step 5: Review regularly your asbestos management plan and asbestos register

You must update your asbestos register and **AMP** as circumstances change.

We recommend that you review the asbestos register and **AMP** at least annually. This should confirm that the information is accurate and that the arrangements are being effectively applied. It may include an audit.

Following the review, address any identified changes or shortfalls. Communicate any changes to the asbestos register or your **AMP** to all staff.

The review of the **AMP** should confirm that:

- all responsible staff remain conscious of their duties, and their training is up to date
- regular inspections 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

You must update it if:

- there are changes in the identified responsible people or organisations, and consider arrangements to handover responsibilities where staff move on, to maintain continuity
- you get new information, for example, from refurbishment or demolition surveys

- work is undertaken on asbestos materials
- asbestos containing materials are removed, or any damage or deterioration to them is noticed
- significant building works are undertaken which might confuse the documented location of identified asbestos