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MAT Asbestos Management Policy

#HS10

**Last amended 10th March 2025**

**To be reviewed no later than August 31st 2026**

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**Common abbreviations and acronyms**

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| **AA** | Admissions Authority | **GIAS** | Get Information about Schools |
| **AAI** | Adrenaline Auto-Injector (Epi Pen) | **GPA** | Government Procurement Arrangement |
| **ACM** | Asbestos Containing Materials | **HASH** | Herefordshire Association of Secondary Heads |
| **AFH** | Academies Financial Handbook | **HBV** | Honour Based Violence |
| **AHT** | Assistant Headteacher | **HR** | Human Resources |
| **AIR** | Attendance Intervention Reviews | **H&S** | Health and Safety |
| **APIs** | Application Programme Interfaces | **HoS** | Head of School |
| **BAME** | Black, Asian and Minority Ethnic Backgrounds | **HSE** | Health and Safety Executive |
| **BCP** | Business Continuity Plan | **ICO** | Information Commissioners Office |
| **BFR** | Budget Forecast Return | **IHP** | Individual Healthcare Plan |
| **CAMHS** | Child and Adolescent Mental Health Services | **IRMS** | Information and Records Management Society |
| **CEO** | Chief Executive Officer | **IWF** | Internet Watch Foundation |
| **CFO** | Chief Financial Officer | **KCSIE** | Keeping Children Safe in Education |
| **CIF** | Condition Improvement Fund | **KS1/2/3/4** | Key Stage 1/2/3/4 |
| **CIN** | Child in Need | **LAC** | Looked After Child |
| **CLA** | Children Looked After | **LADO** | Local Authority Designated Officer |
| **CMIE** | Child Missing in Education | **LGB** | Local Governing Body |
| **COO** | Chief Operating Officer | **LLC** | Low-Level Concerns |
| **COSHH** | Control and Substances Hazardous to Health | **LSA** | Learning Support Assistants |
| **CP** | Child Protection | **MASH** | Multi-Agency Safeguarding Hub |
| **CPD** | Continuing Professional Development | **MAT** | Multi-Academy Trust |
| **CSCS** | Children’s Social Care Services | **MFA** | Multi-Factor Authentication |
| **CSE** | Child Sexual Exploitation | **MFL** | Modern Foreign Language |
| **CTIRU** | Counter-Terrorism Internet Referral Unit | **NCSC’s** | National Cyber Security Centres |
| **CWD** | Children with Disabilities | **NPQEL** | National Professional Qualification in Executive Leadership |
| **DBS** | Disclosure and Barring Service | **PA** | Persistent Absence |
| **DDSL** | Deputy Designated Safeguarding Lead | **PAN** | Published Admission Number |
| **DfE** | Department for Education | **PECR** | Privacy and Electronic Communications Regulations |
| **DHT** | Deputy Headteacher | **PEP** | Personal Education Plan |
| **DSE** | Display Screen Equipment | **PEEP** | Personal Emergency Evacuation Plan |
| **DSL** | Designated Safeguarding Lead | **PEx** | Permanent Exclusion |
| **DPO** | Data Protection Officer | **PLAC** | Previously Looked After Child |
| **EAL** | English as an Additional Language | **PP** | Pupil Premium |
| **ECT** | Early Career Teacher | **PSHE** | Personal, Social and Health Education |
| **EHA** | Early Help Assessment | **PSED** | Public Sector Equality Duty |
| **EHCNA** | Education, Health and Care Needs Assessment | **PTFA** | Parent, Teacher and Friends Association |
| **EHCP** | Education, Health and Care Plan | **RHE** | Relationships and Health Education |
| **EHE** | Elective Home Education | **RSHE** | Relationships, Sex and Health Education |
| **ELSA** | Emotional, Literacy and Support Assistant | **SALT** | Speech and Language Therapist |
| **ELSI** | Executive Leader for Safeguarding and Inclusion | **SARC** | Sexual Assault Referral Centre |
| **ESFA** | Education and Skills Funding Agency | **SBM** | School Business Manager |
| **EVC** | Educational Visit Coordinator | **SCCs** | Standard Contractual Clauses |
| **EWO** | Education Welfare Officer | **SDQ** | Strengths and Difficulties Questionnaire |
| **EYFS** | Early Years Foundation Stage | **SEMH** | Social, Emotional, and Mental Health |
| **FBV** | Fundamental British Values | **SENCO** | Special Educational Needs Coordinator |
| **FGM** | Female Genital Mutilation | **SEND** | Special Educational Needs and Disabilities |
| **FOI** | Freedom of Information | **SLA’s** | Service Level Agreements |
| **FSM** | Free School Meals | **STEM** | Science, Technology, Engineering and Maths |
| **FTS** | Find a Tender Service | **TA** | Teaching Assistant |
| **GAG** | General Annual Grant | **TCAT** | Three Counties Academy Trust |
| **GDPR** | General Data Protection Regulation | **VSH** | Virtual School Headteacher |
| **RIDDOR** | Reporting of Injuries, Diseases and Dangerous Occurrences Regulations |  |  |

**Statement of intent**

Three Counties Academy Trust (TCAT), understands that, as a proprietor and employer, the overall management of health and safety in all central TCAT buildings and the buildings of all schools within the trust is ultimately the responsibility of the Trust Board. The Trust Board recognises that any asbestos found in any TCAT 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, TCAT will take the necessary steps to ensure that everyone is safe and, unless the incident is minor, will report it to the Health and Safety Executive (HSE).

# Legal framework

This policy has due regard to all relevant legislation and statutory 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’

Where legislation has been passed or updated during the shelf life of this policy, we will always apply the latest version available irrespective of the version quoted here.

This policy operates in conjunction with the following policies:

* Health and Safety Policy (HS1)
* COSHH Policy (HS7)

And the following internal documents:

* Asbestos Management Plan

Central TCAT policies have the policy number identified, e.g. “SG1”. Where no policy number is identified this indicates the policy is a school specific policy available from an individual TCAT school’s website.

# Roles and responsibilities

The Trust Board is the duty holder for asbestos for Three Counties Academy Trust and will be responsible for:

* The overall management of health and safety in all TCAT schools, including asbestos management
* Ensuring that the Trust Estate Manager has been appointed to be responsible for the day-to-day management of asbestos across the TCAT estate
* Ensuring that all staff with delegated responsibilities for health and safety and premises management are appropriately trained to manage asbestos incidents
* Ensuring that 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 the entire TCAT estate

The Trust Estate Manager working with the Executive Leadership Team and School Leaders will be responsible for:

* The day-to-day management of health and safety issues such as asbestos in each TCAT school
* Liaising with the Trust Board on the arrangements in place for managing the risk of asbestos
* Keeping the Trust Board up to date with asbestos management practices and the level of asbestos risk
* Informing the Trust Board 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

All staff will be responsible for:

* Undergoing training to understand what precautions to follow in respect of asbestos and what to do if ACMs are disturbed – site 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 Trust Estate Manager, or to the Chair of the Trust Board where they are part of the TCAT Central Team
* Adhering to the procedures outlined in this policy

# Management survey of asbestos containing materials (ACMs)

The Trust Board will arrange through the Trust Estate Manager for an asbestos management survey to be carried out for all TCAT buildings, including those of each school within the trust every 5 years through a rolling programme. The surveys will record the location and condition of asbestos in all TCAT buildings constructed before 2000 and will identify what types of asbestos containing materials (ACMs) are present and where they are.

The Trust Board will select a surveying organisation accredited by the United Kingdom Accreditation Service to conduct the surveys for its buildings and will be reasonably assured by the organisation that the survey has been conducted in accordance with HSE guidance. It will cover all areas of buildings owned by TCAT, including storerooms, yards, outbuildings, underfloor services, pipes, ceiling voids, corridors and floor ducting. The survey will consider the condition of the ACMs, whether they are likely to be disturbed, and any necessary action that needs to be taken to manage risk. Any areas that are inaccessible will be identified and considered to be areas in which the presence of asbestos cannot be ruled out.

The Headteachers/Heads of School of TCAT schools will be responsible for cooperating with the surveying organisation at the direction of the Trust Board and will ensure the organisation has access to all areas of the school needed to complete the survey.

Following the survey, the Trust Board will follow any recommendations made by the surveying organisation, including the removal of high-risk occurrences of asbestos.

Based on the findings of the survey, the Headteachers/Heads of School of each TCAT school will, in collaboration with the Trust Board and the Trust Estate Manager where necessary, compile an asbestos register for their school showing the locations of all ACMs within any building. Any areas that were inaccessible to the surveying organisation will be clearly recorded, and additional surveys will be taken regarding these areas where any work will be undertaken in or around these areas in line with the ‘Building and maintenance work’ section of this policy.

# Daily management of asbestos

Each TCAT school will follow the following five step process in its management of asbestos.

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

TCAT will carry out an asbestos management survey which records the location and condition of the asbestos in all 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, TCAT 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, TCAT 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**

TCAT 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
* 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

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

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

**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 may also be assigned to avoid situations where there are no responsible staff on site at the time of an incident or query about ACMs.

TCAT 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

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

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

TCAT will update its Asbestos Management Plan and asbestos register as circumstances change, and at least annually. Following reviews, TCAT 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.

# Risk assessment

The Trust Board and Headteachers/Heads of School 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 Trust Board will support the Trust Estate Manager and Headteachers/Heads of School 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

The Trust Estate Manager will report the results of the priority assessment to the Trust Board, who will combine the material and priority assessments to form the ‘total’ assessment which will provide the foundation for an Asbestos Management Plan.

# 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

The Trust Estate Manager will update the asbestos register periodically to reflect the current status of the ACMs within TCAT buildings. Where further asbestos materials have been identified or removed during refurbishment work, this will be recorded.

The asbestos register for each school will be reviewed annually by the Trust Estate Manager and the schools Headteacher/Head of School and any changes will be communicated to all relevant staff.

The Trust Board will ensure that it maintains up-to-date copies of the asbestos register.

# Asbestos Management Plan

The trust Estate Manager and Headteachers/Heads of School and representatives from the Trust Board will work together to develop an Asbestos Management Plan covering each TCAT school to set out the day-to-day management arrangements for controlling the risks from ACMs during regular activities on the premises. Headteachers/Heads of School, as directed by the Trust Estate Manager, 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 Trust Board will ensure that the Asbestos Management Plan assumes that AMCs 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 Trust Board will secure professional advice and follow all relevant HSE guidance.

The Asbestos Management Plan will include the following information as it pertains to each TCAT school:

* 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 each 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 Trust Board as a whole will review and approve the Asbestos Management Plan covering all TCAT schools. It will also ensure that management arrangements across TCAT are effective during school closure periods when staff presence is minimal.

Each school will contribute to the updating of its section of the Asbestos Management Plan and asbestos register as circumstances change, and at least annually. Headteachers/Heads of School will liaise closely with the Trust Estate Manager and Trust Board through any reviews and will work with the Trust Board to address any identified changes or areas for improvements. Headteachers/Heads of School 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 TCAT school’s management arrangements can be found in the relevant section of the Asbestos Management Plan.

# Building and maintenance work

Any building and maintenance work planned on any TCAT buildings where ACMs are known to be or are suspected to be present will first be approved by the Trust Board in consultation with the Trust Estate Manager and CFO. If concerns arise that building and maintenance work may disturb hidden ACMs, the Trust Board 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. TCAT 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 TCAT’s Health and Safety Policy. Where the work has been contracted out, disposal is the responsibility of the contractor, although the Trust Board will have responsibility for obtaining a waste consignment note to confirm that the asbestos was appropriately disposed of.

Headteachers/Heads of School will ensure that all staff and other stakeholders are informed of the proposed works. The Trust Board through the Trust Estate Manager, will consult with union health and safety representatives in a timely manner on matters relating to the planned work.

# Asbestos-related incidents

If anyone within TCAT 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 Trust Board 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, anyone who has come into contact with asbestos, and is concerned about their exposure, will be advised to contact their GP
* Advice will be sought from an asbestos expert regarding remedial action
* Unless the incident is minor, the Trust Board 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

For the affected school, TCAT’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.

# Communication and training

The Trust Board through the Trust Estate Manager will inform staff, volunteers, and other stakeholders of all locations of ACMs and how they could be damaged and disturbed. The Trust Board will ensure that all these people receive the correct information, instructions, and training, and will be clear in what precautions to take.

The Trust Board in consultation with the Trust Estate Manager will have plans in place to ensure that if emergency services request information about the asbestos that is present in any TCAT buildings, information will be provided to help keep emergency service workers safe.

# Monitoring and review

This policy will be reviewed in line with the published schedule at the front of this document and at any point material changes require it by the Executive Headteacher/CEO in collaboration with the Board appointed Trustee, the Trust Board and Executive and Senior Leadership.

Any changes made to the policy will be amended by the Executive Headteacher/CEO and will be communicated to Executive Leaders, the TCAT Central Team and to Headteachers/Heads of School, who, in turn, will alert school-based staff.

The next scheduled review date for this policy is 31st August 2026.

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| Signed by: |
|  | Executive Headteacher/CEO | Date: |  |
|  | Board appointed Trustee | Date: |  |