

ASBESTOS MANAGEMENT PLAN

MAT Version	2.0
Approved by Directors or Delegated Authority	29 th June 2026
Date of next review	May 2027

1. INTRODUCTION

This document is the SHARE Multi Academy Trust's Asbestos Management Plan (AMP), which sets out the procedures and processes in place to manage the risks from Asbestos Containing Materials (ACMs) across the Trust's estate.

SHARE Multi Academy Trust operates in West Yorkshire, overseeing a number of primary and secondary academies. The age of some buildings under the Trust's management means that asbestos may have been used during their initial construction or installed during subsequent refurbishment or maintenance works. Additionally, some facilities operated by SHARE Multi Academy Trust may contain equipment with asbestos within their structure or component parts.

Asbestos refers to the fibrous forms of six naturally occurring silicate minerals, historically utilised for their beneficial properties such as flexibility, high tensile strength, incombustibility, insulation, and resistance to chemical attack. Asbestos was typically added to a range of products to enhance their performance or durability. Many products contain asbestos incidentally due to its prevalence, low cost, and historical popularity. These products have been widely used in the UK and within buildings managed by the Trust. Asbestos use in the UK was prohibited in 1999, so any buildings constructed or equipment produced before this time must be considered by this plan.

The presence of ACMs does not inherently represent danger; however, it poses a potential risk that needs to be managed appropriately. When ACMs are disturbed, damaged, or deteriorate, the asbestos fibres contained within can become airborne, potentially leading to exposure. Exposure to asbestos, particularly significant or prolonged exposure, can cause serious health conditions, including asbestosis, lung cancer, and mesothelioma, all of which are likely to be fatal.

This document replaces all previous Asbestos Management Plans held by the Trust. The decision to replace rather than update has been made due to significant changes in the Trust's portfolio, campus development/redevelopment, and organisational structure, specifically within Estates, Facilities, and Capital Development, which includes the Asbestos Team.

A full list of the individual buildings that constitute the Trust's estate can be found within Appendix I. This table details the date of construction, whether asbestos management surveys have been undertaken, and whether any ACMs have been identified.

Where the Trust leases properties or spaces within properties, the requirements of the Control of Asbestos Regulations (CAR) 2012 must also be considered. The full duty holder requirements, and this Asbestos Management Plan, will also apply to:

- Any property leased which specifically details that the Trust is responsible for asbestos management.
- Any property leased where the Trust has repair/maintenance covenants where asbestos is not specifically mentioned.

Where the Trust leases properties or spaces within properties where they are not specifically responsible for asbestos management or maintenance, some asbestos considerations will still be required. In these instances, the Trust will request details regarding the asbestos management of any properties they lease; these will be reviewed by the Asbestos Management team. If there

is insufficient evidence of appropriate asbestos management, the Trust will request that this is provided or will undertake their own assessments as per the contents of this plan.

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2. AIMS

The Control of Asbestos Regulations (CAR) 2012, specifically Regulation 4 - The duty to manage asbestos in non-domestic premises, identifies the requirement for a written plan which must detail the nature of the risks identified and what measures are in place to ensure their management.

The aim of this plan is to detail how SHARE Multi Academy Trust will meet the requirements of CAR 2012 and how exposure to asbestos will be prevented or reduced to the lowest levels practicable.

2.1. Asbestos Policy Statement

In accordance with SHARE Multi Academy Trust's Health and Safety Policy, the Trust Board and the Chief Executive Officer are committed to achieving high standards of health and safety through the effective management of risk. To protect against exposure to asbestos containing materials (ACMs), appropriate control measures have been put in place and are detailed below. The policy requires anyone involved with the control of ACMs to fully understand their responsibilities and adhere to this Policy and Management Plan.

SHARE Multi Academy Trust recognises its responsibilities and duties under the Control of Asbestos Regulations (2012), referred to hereafter as CAR 2012, and shall take appropriate action to protect the health and safety of students, staff, contractors, and others by effectively managing the risks associated with ACMs identified in the Trust's buildings.

The Director of Operations is responsible for the management of all Trust properties. As part of this, they shall manage the risks from ACMs within Trust buildings during day-to-day use, operational maintenance, and during alteration or refurbishment programmes. This duty of care

will be extended to any facility, building, or area which the Trust leases, rents, or uses beyond the recognised Trust building stock.

Specifically, Regulation 4 of CAR 2012 places a duty on the Trust to manage its asbestos through the production and implementation of an Asbestos Management Plan. The aim of the Asbestos Management Plan is to comply with the duty to manage asbestos in non-domestic premises.

SHARE Multi Academy Trust accepts that it is the legal “Duty Holder” and has an Asbestos Management Plan to comply with its legal obligations.

2.2. The SHARE Multi Academy Trust’s Policy on Asbestos Management

It is the policy of SHARE Multi Academy Trust to:

- Comply with all relevant health and safety legislation and guidance.
- Prevent, so far as is reasonably practicable, the exposure of staff, students, and others to the health risks associated with asbestos.
- Appoint suitably qualified and competent persons to undertake the roles as defined in the Health & Safety Executive Guidance Document HSG 264 “Asbestos: The Survey Guide”.
- Provide adequate financial and physical resources to implement and maintain the Asbestos Management Plan.
- Identify and record the presence of ACMs within all Trust property, so far as is reasonably practicable, and to assess the condition and risk posed by these items.
- Maintain an up-to-date electronic asbestos register which is available to all who require it.
- Maintain identified ACMs or alternatively restrict access or undertake asbestos abatement.
- Remove asbestos from its buildings during refurbishment programmes and where the risk cannot be appropriately managed.
- Make information and guidance regarding asbestos management available to all employees who require it.
- Employ only competent persons and suitable organisations to undertake asbestos-related work at the Trust.
- Review the Asbestos Management Plan at least every 12 months and following any statutory or legislative changes.
- Promote a positive asbestos management culture within the Trust.

2.3. Legislative Framework and Guidance

This Asbestos Management Plan has been created to specifically address the requirements set out in the CAR 2012. This is the sole piece of legislation relating to asbestos in the UK. CAR 2012 sits beneath the overarching requirements detailed within the Health and Safety at Work Act 1974 (HSWA) and the Management of Health and Safety at Work Regulations 1999 (MHSWR).

The HSWA outlines the duty of care that both employers and employees must have for the health and safety of themselves and others while at work. The MHSWR outlines the requirement to undertake risk assessments and defines the principles of prevention to help manage risk. Also stipulated is the need for appropriate training and the requirement to appoint competent persons. The asbestos-specific applications of these fundamental principles are detailed within CAR 2012 and are considered within this plan.

CAR 2012 sets out the legal duties, but practical advice and guidance on how to achieve this are provided within the Approved Code of Practice L143 Managing and Working with Asbestos and Health and Safety Executive (HSE) guidance documents.

These documents, and specifically HSG 227 A Comprehensive Guide to Managing Asbestos in Premises, have been instrumental in informing the content and processes detailed within this plan.

SHARE Multi Academy Trust expects, and will endeavour to ensure as far as is reasonably practicable, that it, and the contractors it employs, will comply with the following HSE guidance documents:

- HSG 247 Asbestos: The Licensed Contractors' Guide
- HSG 248 Asbestos: The Analysts' Guide For Sampling, Analysis and Clearance Procedures
- HSG 264 Asbestos: The Survey Guide

The Construction (Design and Management) Regulations (CDM) 2015 must also be considered by this plan with regard to their general principles and specific requirements regarding asbestos. These regulations apply to all construction projects. Those that last over 30 days, have over 20 workers, or consist of over 500 'man days' must be notified.

Asbestos abatement projects must also be considered under CDM. The general principles of prevention are reiterated within CDM, and priority must be given to avoiding risks within construction projects where this is reasonably practicable. Within the context of asbestos and this plan, this will typically require asbestos removal prior to the commencement of other works. Where removal is not possible or practical, consideration must be given to reducing the risk through abatement works (e.g. encapsulation), adapting work and/or methodology, and providing appropriate information and instruction to workers.

Both SHARE Multi Academy Trust and the Principal Designer must consider asbestos throughout the duration of any construction project, including:

- Providing asbestos information prior to commencement.
- Ensuring that asbestos is considered within pre-construction plans and construction phase plans.
- Allowing sufficient resources, including time, for asbestos to be considered.
- Ensuring asbestos information is updated and kept within the project health and safety file.

Asbestos information required within the health and safety file must be forwarded to the Trust's Asbestos Team upon completion of the project. This information will include:

- Asbestos survey reports
- Project asbestos management plans
- Details of asbestos removal and management
- Details regarding asbestos communication
- Asbestos registers – both removed and remaining items

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- Completion packs – certificates of reoccupation, statements of cleanliness, waste consignment notes

2.4. Asbestos Group/Meetings

Asbestos Safety Group

The Asbestos Safety group will meet on a bi-annual basis and will be attended by representatives from the Asbestos Team and external service providers consultants. This meeting will be used to discuss the operational asbestos requirements of the SHARE Multi Academy Trust and day to day consideration. The group will report to Director of Operations.

Asbestos Consultants Meetings

Asbestos consultants will be required to attend annual contract & KPI meetings with the Asbestos Team. These meetings will be used to discuss the level of service provided against SHARE Multi Academy Trust's requirements, current work being undertaken, audits, and quality reviews.

Asbestos Removal Contractor Meetings

Asbestos removal contractors will be required to attend annual contract & KPI meetings with the Asbestos Team. These meetings will be used to discuss the level of service provided against SHARE Multi Academy Trust's requirements, current work being undertaken, audits, and quality reviews.

3. ACTION PLAN AND PRIORITISATION

Asbestos management is an ongoing process involving a variety of both routine scheduled tasks and reactive activities. While SHARE Multi Academy Trust is a large entity, each academy within the Trust operates with its own budget and has its own priorities and actions. Therefore, it is essential that an action plan with priorities and indicative timescales is prepared for each academy while ensuring alignment with the overarching Trust-wide strategy.

The following has been prepared in line with the HSE guidance document HSG227. Areas/items deemed as having a higher risk potential (in terms of persons or operational impact) will be given priority. Timescales will be based upon available resources and will take into account external factors which may influence them.

Asbestos management is a continuous process that requires constant adaptation and improvement. Reviewing this action table, and whether the actions have been met within the allocated timescales, will help inform any updates or changes to the management process and this document.

The table below highlights the proposed actions, priorities, and timelines at the time of issue of the Asbestos Management Plan. This is the overarching plan for the Trust. Each academy will have its own local priorities and action plan, all of which will be saved within the designated folders on the server. A live and more detailed version of this (and each academy's) action plan is managed by the Asbestos Management Team and is stored electronically on the Trust Intranet. This will be updated as progress is made and/or when other actions are identified.

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Action	Details	Priority	Projected Completion Date
Complete Priority Assessments	To determine the likely risk of someone being exposed to asbestos fibres	High	Sept 2024 Completed
Provide training on the use of the ACM Register	Training will be required for SHARE MAT employees on how to interact with the new asbestos plan	High	Nov 2024 Completed
Undertake the priority asbestos abatement works identified in management surveys	Prepare specifications based on the priority assessments of the ACMs identified	High	Sept 2024 Completed
Undertake asbestos duty holder training	Asbestos training for senior SHARE MAT executives	High	Aug 2025
Undertake re-inspections of asbestos data	Use a UKAS 17020 accredited provider.	Med	Feb Half Term 2025 Completed
Review / update management plan	Annual review of AMP	Med	Feb Half Term 2025 Completed
Maintain program of asbestos awareness training	Delivered through e-learning as part of annual training	Med	Nov 2024 Completed – Ongoing
Integrate asbestos awareness into the new employee induction training	In planning	Low	June 2027
Audit AMP	To determine ongoing effectiveness of arrangements	Low	Completed
Audit asbestos service providers	To confirm statutory compliance with CAR 2012	Low	Completed - Ongoing
Review potential for streamlined asbestos permit process	In planning in conjunction with Soteria Compliance Ltd	Med	June 2027

4. ORGANISATIONAL STRUCTURE

SHARE Multi Academy Trust is a large and complex entity with over 700 employees located within its various primary and secondary academies. In addition, the Trust typically supports over 6000 students.

All persons who work at, or may be present within Trust property, have responsibilities under this plan. The nature and extent of these responsibilities will be directly proportional to, and in line with, the nature of their roles and the work that they undertake.

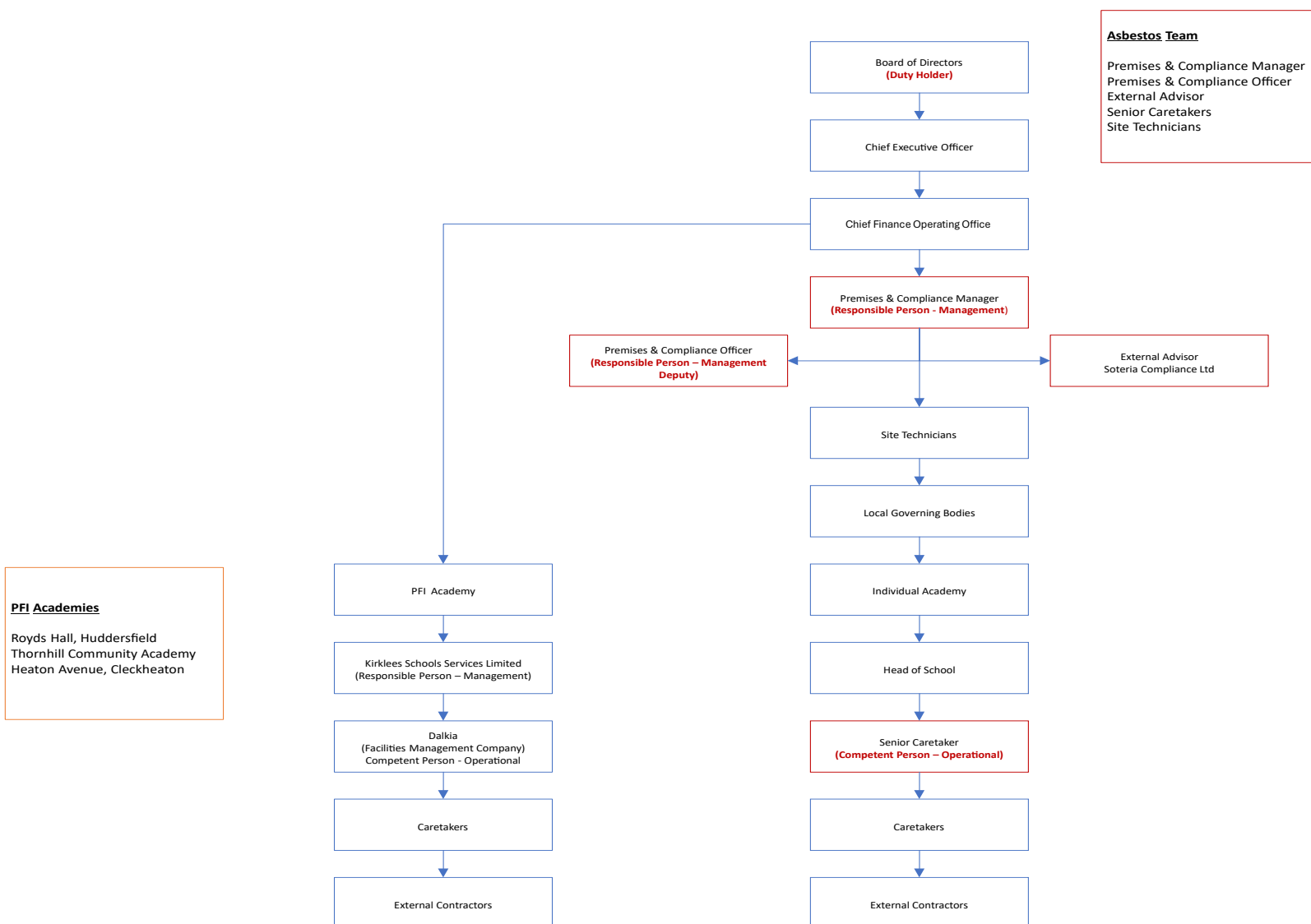
The majority of ACMs within the Trust's estate are associated with the building structure and estates infrastructure. Therefore, the majority of this section, and the following section 5.0 Roles and Responsibilities, will primarily address those parts of the Trust where employees undertake, instruct, or manage work on the fabric of the building. These are the areas where the risk potential is most significant.

The following have been deemed as requiring specific consideration as they have departments or employees that are most likely to come across, or have to consider asbestos, in the course of their work:

- Those with legal responsibilities under CAR 2012, including the Duty Holder and Responsible Person
- Operations Director Maintenance
- Premises & Compliance
- Facilities Management
- Information & Technical Systems

The following figure identifies the asbestos management structure at the Trust, including key roles, departments, and a summary of their respective responsibilities:

Asbestos Management Structure



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5. ROLES AND RESPONSIBILITIES

This section identifies those who have responsibilities under this Asbestos Management Plan and what those responsibilities are. This section has been split into two parts: roles with defined asbestos responsibilities and those with more general responsibilities to be considered throughout the course of their work.

SHARE Multi Academy Trust understands the importance of asbestos management and has an Asbestos Management team dedicated to supporting the AMP and the persons and processes detailed within. The Asbestos Management team is not confined to one specific premises, and is contactable via email or phone as per Section 1.

5.1. Roles with Defined Asbestos Responsibilities

Role	Responsibility
SHARE Multi Academy Trust Directors (Duty Holder)	- The SHARE Multi Academy Trust Directors are responsible for determining the educational character and mission of the Trust, for oversight of its activities and for the efficient use of resources. - The Members, as the employer, has the ultimate responsibility for health and safety and is the Duty Holder for The SHARE Multi Academy Trust. The Directors have delegated the duty of the day-to-day running of the Trust to the Chief Executive Officer (CEO).

Role	Responsibility
Chief Executive Officer	Is responsible for the strategy and allocation (within the limits of the approved budget) of financial and other resources for the control of ACMs within Share Academy Trust. - Ensuring, so far as is reasonably practicable, that adequate resources are provided to enable compliance with the Asbestos Management Plan. - Ensuring suitably qualified and competent persons are appointed to discharge the responsibilities within the AMP. - Ensuring, so far as is reasonably practicable, the appointment of a suitably qualified and competent senior technical authority to audit and provide external assurance of asbestos management within the Trust. - Supporting asbestos training and development for all who may require it within the Trust. - Supporting the development and implementation of robust procedures to manage asbestos and control work on the Trust estate. - The CEO through the Director of Operations shall ensure, so far as is reasonably practicable appropriate resources and expertise is in place for asbestos

management in accordance with the Trust's Asbestos Management Policy and Asbestos Management Plan.

Role	Responsibility
Chief Finance Operations Officer	Lead responsibility for the asbestos safety management function. - Formally appointing a competent authority to act as the 'Responsible Person – Management'. - Delegate duties for the day-to-day management of ACMs to the Responsible Person. - Ensure, so far as is reasonably practicable that the Responsible Person is aware of their role and responsibilities and that they are competent to discharge them in entirety. - Ensure, so far as is reasonably practicable that the implemented AMP is monitored so that working arrangements and provision of financial, technical, human and other resources are suitable and sufficient to meet its requirements. - Ensure, so far as is reasonably practicable that adequate (financial and human) resources are understood and requested to enable compliance with the Asbestos Management Plan. - In consultation with the Responsible Person appoint other resources for the day-to-day management of asbestos. These will include: - An Asbestos Inspection & Testing Provider - A Licensed Asbestos Removal Contractor (LARC) - A competent authority to provide external advice and verification of asbestos management within the Trust. - Formerly instruct the periodic review of the AMP as required.

Role	Responsibility
Premises & Compliance Manager	- Designated responsible person for asbestos. - Facilitating the auditing and ongoing updates to the Asbestos Management Plan.
Responsible Person	Managing and maintaining the asbestos register, including instructing statutory surveys and re-inspections.
Asbestos Team	- Ensuring so far as is reasonably practicable that appropriate management actions are in place for all ACMs. - Identify and develop asbestos abatement strategies where management is not appropriate. - Informing relevant persons within Academies and Premises of any dangerous conditions. - Provide periodic reports to the Director of Operations.

- Investigate and report on any asbestos incidents and emergencies.
- Manage and assess suitability of asbestos consultants and their work.
- Manage and assess suitability of asbestos contractors and their work.
- Identify needs and develop content of asbestos training for Trust employees.
- Undertake asbestos training/toolbox talks.
- Provide technical asbestos support for all Trust employees and projects.
- Maintain knowledge of current industry and legislative changes.
- Promote a positive asbestos culture.

Role	Responsibility
Premises & Compliance Officer	• Support the Premises & Compliance Manager in overseeing the Trust's asbestos management program.
Responsible Person (Deputy)	• Act as the point of contact during the absence of the primary responsible person.
Asbestos Team	• Support the Auditing and Updating of the Asbestos Management Plan • Assist in Managing and Maintaining the Asbestos Register, ensuring the register is kept current and accessible to relevant stakeholders. • Collaborate with the primary asbestos manager to ensure that appropriate management actions are in place for all Asbestos-Containing Materials (ACMs). • Assist in Developing Asbestos Abatement Strategies • Identify situations where asbestos management may not be sufficient and support the development of abatement strategies. • Provide input on risk assessments and action plans. • Communicate with Relevant Persons on Dangerous Conditions • Provide Reports to the Director of Operations • Investigate and Report on Asbestos Incidents • Assess and Manage Asbestos Consultants and Contractors • Stay Updated on Industry and Legislative Changes • Maintain awareness of current industry trends, regulations, and legislative changes related to asbestos management. • Promote a Positive Asbestos Culture

5.2. Roles with General Asbestos Responsibilities

Role	Responsibility
Executive Principal	- Cooperate with the Asbestos Team to help facilitate access and arrangements for any statutory asbestos surveys, inspections or abatement work which may be required within their demise. - Ensure that the activities/work within their areas which could potentially disturb asbestos (work on the building fabric or services) are undertaken as per the requirements of the AMP. - Identify and inform the Asbestos Team of any employees whose work may involve disturbing the fabric of the building or services within so that provision for training can be made. - Report any suspect materials, building damage or unsafe working to the Asbestos Team. - Consider the potential for asbestos within departmental equipment (in use and during acquisition and disposal) and liaise with the Asbestos Team for support.
Associate Principal	
Head Teacher	
Associate Head Teacher	
Head of School	

Role	Responsibility
Senior Caretakers	- Have a working knowledge of the AMP and responsibilities defined within. - Undertake work inline with the requirements of the AMP. - Engage with Asbestos Team during planned refurbishment and development work. - Review existing asbestos information and where appropriate instruct asbestos consultants to undertake additional surveys. - Provide asbestos information to those undertaking work. - Where asbestos abatement works are necessary instruct asbestos consultants to prepare a specification for abatement. - Where necessary instruct LARCs to undertake asbestos abatement and asbestos consultants to undertake analytical monitoring. - Collate and provide handover information to the Asbestos Team following any asbestos works, including updating the asbestos register. - Attend and engage with asbestos training provided.
Asbestos Team	
Competent Person (Operational)	

Role	Responsibility
Caretakers	- Review and interpret asbestos information prior to allocating work. - Provide asbestos information to those undertaking work.

	- Where appropriate seek additional asbestos advice or investigations through the Asbestos Team or external asbestos consultants. - Where necessary instruct LARCs to undertake abatement work. - Attend and engage with asbestos training provided. - Inform Asbestos Team of new positions/persons within their teams who may require asbestos training.
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Role	Responsibility
Teachers	- Undertake all work inline with job descriptions, training, methodology and risk assessments. - Report any suspect materials, building damage or unsafe working to the Asbestos Team.

Role	Responsibility
Students	- Avoid damaging or disturbing the fabric of the building. - Report any damage and defects through the official the Trust channels.

Role	Responsibility
External Contractors/Consultants	- Comply with the AMP responsibilities detailed above if undertaking any of these roles on behalf of the Trust. - Review asbestos information and heed asbestos advice provided. - If asbestos information is not provided, request it. - Undertake all work inline with agreed scope, current risk assessments and permits in place. - Not undertake any work on asbestos products unless approved by the Asbestos Team. - Escalate asbestos concerns to instructing manager and/or Asbestos Team. - Have valid asbestos training commensurate with their role. - To make suitable provisions, ensure the above is undertaken by any sub-contractors in their employ.

6. TRAINING

SHARE Multi Academy Trust recognises its responsibilities under Regulation 10 - Information, Instruction, and Training of CAR 2012. The Trust will provide role-specific asbestos training to all employees who are potentially liable to disturb ACMs and to those who supervise, manage, or instruct them.

To ensure that the training provided is appropriate to the role and responsibilities of the employees, a number of training types are available. The target audiences and a summary of the training content and duration are provided for each.

Standard Trust Employee Training

Training Type	Who For	Specific Content
Asbestos Induction	Those whose work may bring them into contact with asbestos incidentally and first responders. <i>For example: Teachers, HLTA, Support Staff</i>	Brief content on properties and uses of asbestos • The health effects. • Typical asbestos applications at the Trust. • Identifying and escalating issues. • The Trust Asbestos Team contact information.
Asbestos Awareness	Those who work on the fabric of the building and services within. <i>For example: School Caretakers, Site Technicians, IT Technicians</i>	• The properties of asbestos. • The health effects including the effect of smoking. • Typical asbestos products and their applications. • Typical ACMs at the Trust. • Asbestos surveys and registers. • Emergency procedures. • Process for obtaining asbestos information at the Trust. • Operational staff responsibilities and responsibilities of their managers. • Interpreting asbestos information. • Process for asbestos within projects. • Instructing surveys, specification production and asbestos abatement. • Providing operatives and contractors with asbestos information. • The Trust Asbestos Team contact information.
Asbestos Duty Holder	Those who have senior management responsibilities and specific duties under this Management Plan. <i>For example; Trust Members, Director of Operations, Premises Compliance Manager/Officer</i>	• Legislative framework. • Duty Holder requirements. • Key concepts of asbestos management. • Designated persons and responsibilities. • The Trust Asbestos Policy and Management Plan.

6.1. Induction Training

Induction training will be provided to those who are identified as requiring asbestos training in section 6.2. Induction sessions are arranged and conducted by either the Central HR Manager, or Academy specific Administration Manager. This training provides a brief overview of key information while full training is being planned.

Development is underway to provide induction training via e-learning. This training will include some of the basics from asbestos awareness but will centre on the processes, information, and support in place at SHARE Multi Academy Trust.

6.2. Refresher Requirements & Internal Communications

No employees of SHARE Multi Academy Trust will be trained in either the identification or the removal of ACMs. The limit of the training will be asbestos awareness training, which will be provided to relevant employees, such as those who may disturb ACMs through activities like maintenance. This training will be industry-approved and will be refreshed according to the guidelines stated on the certificate.

Where the need is deemed urgent, the Asbestos Team may undertake toolbox talks to specific groups as and when these are required.

The Trust do not allow their own employees to undertake any work on asbestos products irrespective of the PPE and RPE that may be available.

6.3. General External Contractors/Consultants

All contractors and consultants who undertake work as defined below will be required to have, as a minimum, valid asbestos awareness training:

- Work on the fabric of the estate – building structure, fixtures, finishes, internal and external.
- Work on building plant and equipment – mechanical, electrical, ventilation, gas, etc.
- Work which could foreseeably disturb any of the above.
- Work planning or instructing those to undertake the above.
- Workers who access non-occupied/service areas – plant rooms, ducts, risers, ceiling voids, etc.

However, if it is proven through inspection that no asbestos is present directly in the work area, or that the work will not indirectly affect any areas containing ACMs, then the contractor may not necessarily need asbestos awareness training as a minimum requirement.

6.4. Asbestos Consultants

Asbestos consultants provide a range of services to the Trust, each have specific training and experience requirements. These are as follows

Role	Minimum Training Requirement
Asbestos Surveying	▪ BOHS P402 or equivalent ▪ UKAS 17020:2012
Analytical Monitoring and Clearances	▪ BOHS P403 & P404 or equivalent ▪ UKAS 17025:2017
Bulk Analysis	▪ BOHS P401 or equivalent ▪ UKAS 17025:2017 ▪ Participation within AIMS
Register Input	▪ Asbestos Awareness (Cat-A)
Non-Licensed Asbestos Removal	▪ Non-Licensed Asbestos Removal (Cat-B)
Licensed Asbestos Removal	▪ Licensed Asbestos Removal (Cat-C) ▪ HSE License (unrestricted)

6.5. Licensed Asbestos Removal Contractors

Licensed Asbestos Removal Contractors (LARCs) are critical to the safe management and removal of asbestos within SHARE Multi Academy Trust. To ensure the highest standards of safety and compliance, LARCs must meet the following requirements:

Licensed Asbestos Removal Training: LARCs must undergo licensed asbestos removal training that is assessed or refreshed on at least an annual basis. This ensures they remain current with best practices and regulatory requirements.

CSCS Skills Card: LARCs must carry the CSCS Skills card, which is underpinned by the NVQ scheme. This card demonstrates their competence and qualifications in handling asbestos safely.

Approved Provider Register: A register of approved external providers will be maintained and accessible by the Access Financial Accounting System. This register ensures that only authorised and competent providers are engaged for asbestos-related work.

Strict Compliance: It is not permitted to use any provider who is not authorised in the external assessment database. This strict compliance ensures that all asbestos removal work is carried out by qualified and vetted professionals.

7. IDENTIFICATION AND ASSESSMENT OF ACMS.

Regulation 4 of CAR 2012 states that suitable and sufficient assessments must be undertaken to ascertain whether asbestos is, or is liable to be, present. Regulation 5 of CAR 2012 states that employers must not undertake work which may disturb the building structure/services unless a suitable and sufficient assessment as to whether asbestos is present has been carried out. Assessments must also be made on the nature of the materials identified and the risk potential they present.

SHARE Multi Academy Trust fulfils these requirements by:

- Undertaking a range of asbestos surveys using approved asbestos consultants.
- Conducting inspections within the Asbestos Team.
- Assuming asbestos is present and prohibiting works in areas where no information is available until further assessment is undertaken.

This approach ensures that all potential asbestos risks are identified and assessed before any work that could disturb ACMS is carried out, thereby protecting the health and safety of students, staff, and contractors.

7.1. Historical and Current Positions

SHARE Multi Academy Trust includes nine academies, some of which have had historical management surveys. However, as of November 2023, management surveys were commissioned for all relevant schools (i.e., those constructed before 2000) to provide a baseline data set to populate academy-specific asbestos registers. Priority assessments were then undertaken to provide an action list and plan for the abatement of identified asbestos-containing materials.

This approach ensures a comprehensive understanding of asbestos presence within each academy, enabling the Trust to effectively manage and mitigate asbestos risks across its estate.

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7.2. Asbestos Surveys

Any properties constructed before 2000 have the potential to contain ACMs and therefore will be subject to the requirements under CAR 2012. SHARE Multi Academy Trust will undertake asbestos Management Surveys for all properties constructed before this date.

Where intrusive work is planned for buildings constructed pre-2000, additional asbestos surveying will be required. Depending on the scope of the works, asbestos refurbishment or demolition surveys will be necessary. These additional surveys will be required irrespective of whether asbestos has been identified within the management survey.

All asbestos surveying will be undertaken by Trust-approved, UKAS accredited asbestos consultants in line with the requirements of HSG 264 Asbestos: The Survey Guide. All asbestos survey reports will be collated by the Asbestos Team and archived within the Asbestos Safety Management folder on the Trust Intranet.

Re-inspections will be undertaken by UKAS accredited asbestos consultants to ensure ongoing compliance and safety.

Management Surveys

Management surveys should locate, as far as reasonably practicable, the presence and extent of any suspect ACMs that could be damaged or disturbed during normal occupancy, including foreseeable maintenance and installation. An assessment must also be made of the condition of these items.

Management surveys should include an assessment of the condition of the ACMs and their potential to release fibres into the air if disturbed. This will be done through material assessment scoring, which will form the starting point for assessing the risks posed by the ACMs.

Management surveys will typically include a combination of both sampling and presumptions of suspect materials and ACMs.

Management surveys will also include limitations or areas of no access that have not been subject to inspection. These areas must be presumed to contain asbestos until suitable checks have been undertaken.

By conducting comprehensive management surveys, SHARE Multi Academy Trust aims to identify and assess ACMs to ensure they are managed safely and in accordance with regulatory requirements.

Refurbishment Surveys

Refurbishment surveys will be required where the proposed work will include significant or highly intrusive work to the building structure. This may include, but is not limited to:

- The removal or opening up of fixed structures such as partitions, walls, fixed ceilings, boxings, and roof coverings.
- The removal of room furniture or finishes such as door sets/architraves, skirting, windows, floor coverings, fixed benches or seating, and claddings.
- Work on plant and equipment such as the removal of plant/pipes in boiler rooms, boiler dismantling, work on ventilation duct systems, and pump replacements.

Refurbishment surveys will be fully intrusive, with intrusions representative of the work required, and aggressive inspection techniques will be used. It is essential that sufficient detail regarding the scope of the work required is provided to the asbestos surveyor to ensure that appropriate investigations are undertaken.

It is anticipated that many projects may not commence until several months after the survey has been completed. Therefore, SHARE Multi Academy Trust requires material assessments to be undertaken for all ACMs identified in refurbishment surveys.

Additional consideration will need to be given to suitable 'making good' of any intrusions made to continue normal use of these areas until the work is undertaken. This will depend on the nature of the intrusion and the space being surveyed.

Refurbishment surveys should be undertaken in unoccupied areas, and consideration may need to be given to the isolation of live services. Refurbishment surveys should not contain any presumptions or limitations unless prior agreements are made. Any unavoidable limitations must be considered by the project/work team and may be resolved by a secondary survey visit upon full access being available.

Demolition Surveys

Demolition surveys will be required prior to the demolition of full buildings or significant areas or aspects of a building. This type of survey will be fully intrusive and will consist of aggressive inspection techniques to all building structures, finishes, plant, equipment, fittings etc as detailed for refurbishment surveys above.

Demolition surveys must be undertaken in unoccupied areas and will require isolation of live services within. It will not be possible to return an area to normal use prior to the work being undertaken following a demolition survey.

Re-inspections

Any ACMs which have been identified within surveys, which are not scheduled for removal, will be subject to periodic re-inspection. Re-inspection frequencies will be based upon the risk potential but this will typically be based upon an annual cycle. Re-inspections will consist of a visual inspection of all asbestos applications to assess and record whether any changes have occurred. This may be changes in condition, surface treatment or changes to the usage of the areas where they are located.

The asbestos register will be updated for each academy upon completion of the re-inspection process.

7.3. The Asbestos Register and Accessing Information

SHARE Multi Academy Trust maintains its asbestos register within the organisation's intranet. All spaces within pre-2000 buildings contain records relating to their asbestos status and have details of asbestos products present.

The Asbestos Team is responsible for maintaining the asbestos register and ensuring that the information within it is updated when changes occur.

To access the asbestos information, all users will require their own login to ensure that appropriate access rights can be set and use of the system can be accurately monitored. Non-

Trust persons who require asbestos information must be provided with the relevant data by their commissioning manager or the Asbestos Team.

Work is underway to establish a quick access portal for asbestos-specific documentation to contractors and other stakeholders. This method, which is currently being evaluated, aims to provide secure access to relevant asbestos information via the Trust intranet. A proposed feature includes QR codes mounted on plaques at each academy, enabling contractors to scan and instantly retrieve site-specific asbestos details. Additionally, the portal is expected to record access details for audit purposes, ensuring the academy can confirm that contractors have reviewed the necessary information before commencing any works.

If required, the most recent asbestos management surveys and re-inspection reports can also be accessed via the organisation's intranet, and hard copy folder stored in the Caretakers' office.

The Asbestos Management portal/folder contains:

- Asbestos survey reports
- Asbestos documents
- Asbestos forms
- Restrictions and Safe Systems of Work (SSOW)
- Asbestos Safety Group documentation

The Asbestos Team can be contacted for further advice following a review of the asbestos management reports/register. Where higher risk and/or damaged asbestos products have been identified, access to these areas has been restricted until abatement work can be undertaken. Any areas of restriction are detailed within the Restrictions and SSOW pages, which include annotated floor plans. The Asbestos Team should be contacted regarding any access or proposals for these locations.

By maintaining a comprehensive and accessible asbestos register, SHARE Multi Academy Trust ensures that all relevant stakeholders have the necessary information to manage asbestos safely and effectively across the Trust's estate.

7.4. Assessing the Risks

All ACMs identified will be subject to risk assessments which will be based upon Material Assessment Scoring and subsequent Priority Assessment Scoring. The scoring systems used will be as per the guidance within HSG 227 and HSG 264.

Material Assessments

The purpose of material assessment scoring is to assess the relative risk of an ACMs ability to release asbestos fibres and therefore the potential for exposure. Material assessments will be undertaken for all identified and presumed ACMs, and will consider the following:

- Product type
- Extent of damage
- Surface treatment
- Asbestos type

Material Assessment scoring will be undertaken by the Trust approved asbestos consultants at the time of the survey, and will be included within both management and refurbishment survey

reports issued. In addition material assessment scores will be reviewed, and amended as necessary, during the re-inspection of any previously identified ACMs.

Following re-inspection, material scores will be updated within the asbestos register.

Full details of the material assessment scoring system can be found within **Appendix II**

Priority Assessments

The purpose of priority assessments is to assess the potential risks which may result in disturbance of ACMs based upon the nature of the space, the location of asbestos within it and how the space will be used. Priority scoring will be undertaken for all identified and presumed ACMs, priority assessments consider the following:

- Normal occupant activity
- Likelihood of disturbance
- Human exposure potential
- Maintenance activity

Initially, the priority assessments will be conducted by the Asbestos Team, including the academy-specific premises managers, along with the asbestos consultants. It is the intention to provide the asbestos consultants with specific guidance to allow them to generate priority assessment scores for inclusion in all future management/reinspection surveys. Following reinspection, priority scores will be updated within the asbestos register.

As the information required for priority assessments relates mostly to the occupation and usage of the spaces, the Trust's Asbestos Team will ensure that appropriate considerations are made and communicated effectively to the consultants.

Priority scoring guidance is available for typical room types present across the Trust, details of this guidance can be found in Appendix III.

There is no requirement to undertake priority assessments for ACMs identified within refurbishment or demolition surveys. However, the Trust may request that these assessments be undertaken if there is a known significant delay between the survey and any subsequent removal works.

Full details of the priority assessment scoring system can be found within **Appendix III**.

Combined Risk Scores

Once the individual material and priority scores have been generated these are combined to form an overall risk score for each ACM identified. These scores provide an indicative assessment of the relative risk of each ACMs and assist in determining where abatement is required and which items may require prioritisation. Categorisation of these combined risk scores can be found in the table below.

Combined Risk Score	Categorisation	Actions Required
2-8	Very Low Risk	Low risk products with applications unlikely to be disturbed – low exposure potential. Record in register and periodically re-inspect. Re-inspection frequencies are likely to be 12 months or longer.
9-13	Low Risk	Applications which are in good condition and unlikely to be disturbed. Record in register and periodically re-inspect. Re-inspection frequencies are likely to be around 12 months.
14-17	Medium Risk	Higher risk products in good condition, moderate risk products which may require abatement, products in locations where disturbance is possible. May require more frequent re-inspections, repair, encapsulation or removal.
18-24	High Risk	Higher risk products which due to their location and/ or condition require urgent attention. These items require urgent attention/prioritisation and may require locking off/access restrictions and planned removal or abatement.

Asbestos risk scoring algorithms are a useful tool when considering multiple ACM applications across a large estate. The scoring process assists in determining which items require prioritisation when many actions may be needed. SHARE Multi Academy Trust understands that risk scores are only indicative and that priority scoring can be somewhat subjective. There may be additional factors beyond the set criteria that influence the need to undertake abatement.

Therefore, all items identified as requiring action, and those which have become damaged, will be assessed on an individual basis to identify appropriate actions and associated prioritisation. This approach ensures that each situation is carefully evaluated to determine the most effective and timely response, enhancing the overall safety and management of asbestos within the Trust.

8. MANAGEMENT OPTIONS

All ACMs will be assessed via the processes detailed above and will be allocated risk ratings using the material and priority scoring algorithms. All identified asbestos applications will be assigned a specific recommendation appropriate to their score. This will be conducted by the Trust approved asbestos consultants during the surveys/inspections and will be documented within the subsequent reports. Typically, these recommendations will be broad and generic – eg remediation required – this could entail repair, encapsulation, enclosing etc.

The Asbestos Team will review these recommendations and will specifically detail the actions required. These will primarily be based upon the risks but will also consider organisational knowledge of planned and reactive works, proposed refurbishment works and operational needs

Monitor/Manage in Situ

This option will be applied to ACMs which are unlikely to be disturbed or become damaged, are in good condition and/or are inaccessible or low risk.

Identified ACMs will be recorded within the asbestos register and will be subject to periodic reassessment to assess their ongoing condition. Re-inspection frequencies will be set dependent on the risk potential but will typically be based on an annual re-inspection. Higher risk ACMs within occupied areas/areas of heavy use may require re-inspections every six months. Lower risk ACMs such as floor coverings may only require reinspection every two years.

The Trust will take a practical approach to re-inspections and will consider assessing all ACMs within a building while re-inspection of higher frequency items are being undertaken. Re-inspections will be undertaken by Trust approved asbestos consultants.

Re-inspection frequencies may also be reviewed upon the identification of issues or following audits.

Repair

This option may be applied to ACMs that have become damaged and may involve the use of encapsulants and binders such as ET150 and scrim cloth. The option to repair ACMs will typically only be considered in the following circumstances:

- As a temporary measure to make an application safe while full removal is planned
- Where full removal is not possible/ practicable e.g. where ACM is integral to equipment/building structure

This option will not be preferred for use, as consideration must be given as to how and why the damage occurred and whether this is likely to reoccur.

Encapsulate/Seal

This option will be considered and typically applied to higher risk ACMs which are in reasonable condition but are unsealed or lower risk ACMs where their location and use of the area makes them prone to disturbance. This will include unsealed asbestos insulating board (AIB), unsealed thermal insulation and associated residues to building structure and some textile products such as joint seals and vibration pads.

Enclose

This option may be applied to ACMs which have been identified as showing damage or to higher risk ACMs which are unsealed where it may not be possible or practical to encapsulate or remove. Typically, this may apply to applications that are not fully accessible due to location and/or surrounding building structure.

Enclosing will typically include 'boxing in' or overcladding the ACM application with any boarding type product. When enclosing is undertaken, consideration must be given to the method of fixing or constructing the enclosure – fixing or drilling into ACMs will not be allowed. Additional considerations may also need to be given as to whether any enclosures constructed will need to be fire rated.

It may be necessary to construct temporary enclosures using polythene sheeting or similar around damaged ACMs in emergency situations. This will only be deemed acceptable where remediation works are being planned.

Restrict Access

In some instances ACMs will be identified which present a significant or immediate risk which cannot be immediately actioned or appropriately managed. In these instances, the initial option will be to restrict access. These situations will include:

- Areas where damaged asbestos material, residues or debris is present
- Areas where unsealed higher risk asbestos materials are present

Where physically possible caretakers this will 'lock off' through appropriate method. Keys can only be obtained through direct consultation with the Asbestos Team.

Where it is not possible to install/apply a lock (eg ceiling void) then access will be prohibited by a combination of additional measures which will include;

- updating register to reflect restriction,
- application of physical barriers,
- signage,
- communication with operational managers.

A register of restricted locations is located within the within the Asbestos Safety Management folder.

Remove

This option will be applied to all asbestos applications which cannot be appropriately managed through any of the options detailed above. This will typically include ACMs which are damaged, those which are deteriorating, those which are redundant or associated with equipment which is redundant and removal of items to lift restrictions upon access as detailed above.

Removal will also be undertaken prior to project or maintenance work which will involve disturbance to then building fabric or infrastructure.

In some instances ACMs which are suitable for other management options, may be removed. This will be considered where:

- Removal of other adjacent items is required
- The cost of removal is on a par with other management options

8.1 Identification and Labelling of Known Asbestos-Containing Materials (ACMs)

To ensure the safe management of asbestos-containing materials (ACMs) within the academy premises, it is essential to identify and label these materials appropriately, based on their type and location. The following guidelines outline the approach to labelling ACMs, taking into consideration the risks associated with different types of asbestos materials and the environments in which they are found.

Labelling of ACMs Based on Material Type

- **Low-Risk Materials** (e.g., Chrysotile floor tiles, bitumen adhesive):
 - These materials pose a minimal risk of asbestos fibre release when undisturbed. Due to the low risk and the potential for labels to wear off in high-traffic areas, such as floors, **asbestos warning stickers will not be applied** to these materials.
 - **Alternative identification methods** will be utilised, such as maintaining detailed records of the locations and types of ACMs within the Asbestos Management Portal, which can be accessed by the Asbestos Team and relevant personnel.
- **Higher-Risk Materials** (e.g., fibrous asbestos materials like asbestos insulation board (AIB) or sprayed coatings):
 - These materials present a higher risk and therefore **must be visibly labelled** to ensure that anyone working in proximity is aware of the potential hazard.

- In areas where these materials are present but accessible to students, staff, or the public (e.g., classrooms, common areas), **a discreet yellow warning sticker** will be used instead of a standard asbestos warning sticker. This yellow sticker will not explicitly mention asbestos, reducing the risk of unnecessary alarm, but it will serve as an internal signal to staff and the Asbestos Team that the area contains higher-risk ACMs.

Communication and Awareness

- **Internal Communication:**
 - Teachers, staff, and persons responsible for specific areas where yellow warning stickers are used will be **informed about the significance of these stickers**. They will be instructed that if any area marked with a yellow sticker becomes damaged, the Asbestos Team must be notified immediately for further assessment and action.
- **Asbestos Management Records:**
 - All ACMs, regardless of labelling, will be documented in the Asbestos Management Portal. This record will include the type, location, and condition of the materials, along with any associated labelling used.
 - The Asbestos Team will be responsible for keeping these records up to date and for ensuring that all relevant staff members are aware of the ACM locations and the protocols to follow if these materials are disturbed.

10.5.3 Minimising Public Concern

- **Discreet Labelling Strategy:**
 - The use of yellow warning stickers in place of explicit asbestos labels in publicly accessible areas is a deliberate strategy to minimise unnecessary concern while ensuring safety.
 - The presence of asbestos in a managed state poses no risk, and this approach helps to prevent undue alarm among parents, students, and visitors, while still ensuring that those who need to be aware of the presence of ACMs are informed.

This approach to identifying and labelling ACMs balances the need for safety and awareness with the goal of minimising unnecessary public concern.

9. Safe System of Work

Regulation 6 of CAR 2012 states that the employer must not carry out work that is liable to expose employees to asbestos unless a suitable and sufficient assessment of the risk has been undertaken. The potential for exposure must be assessed, and the steps to help prevent or reduce this must be documented.

SHARE Multi Academy Trust understands these requirements and is developing Safe Systems of Work (SSOW) that must be used where asbestos risks are known. Typically, SSOW will be required in locations where:

- Damaged asbestos material, residues, or debris are present.
- Unsealed higher risk asbestos materials are present.

Areas identified as containing the above will be subject to access restrictions. Where physically possible, this will be enforced by locks. Keys can only be obtained through direct consultation with the Asbestos Team. A register of locked-off locations is maintained by the Asbestos Team. Details of restricted locations can be found on the trust intranet.

Currently, the Trust has a number of areas where access is restricted due to asbestos. These areas will remain restricted until asbestos abatement or inspection has been undertaken. Each academy will have areas that were inaccessible at the time of the survey and are therefore presumed to contain asbestos materials. These areas are considered unsafe to access without inspection by the Trust's asbestos consultants

The areas presumed to contain asbestos will be communicated to all relevant staff. Until these areas have been inspected by a qualified asbestos consultant, access will be strictly controlled by the premises caretakers and the Asbestos Team. A SSOW will be developed for each area and will be appropriate to the type of access or activity that is required to be undertaken there. The SSOW will consider:

- Review of known asbestos information
- Assessment of the exposure potential
- Documented methodology including equipment
- Selection of, and training in the appropriate PPE and RPE
- Face fit testing (*where required*)
- Emergency decontamination procedures (*where required*)

The SSOW will not be appropriate for all locations and all work activities that may be required. All access and proposed work within areas that have restrictions must be discussed with the Asbestos Team prior to commencement. Any works that may result in significant disturbance will not be permitted.

10. Controlling Work/Contractors

HSG 227 clearly sets out the need to control work on the fabric of the Trust's buildings. This can be achieved through a combination of measures, including systems and procedures, permits, individual roles and responsibilities, and contractor management.

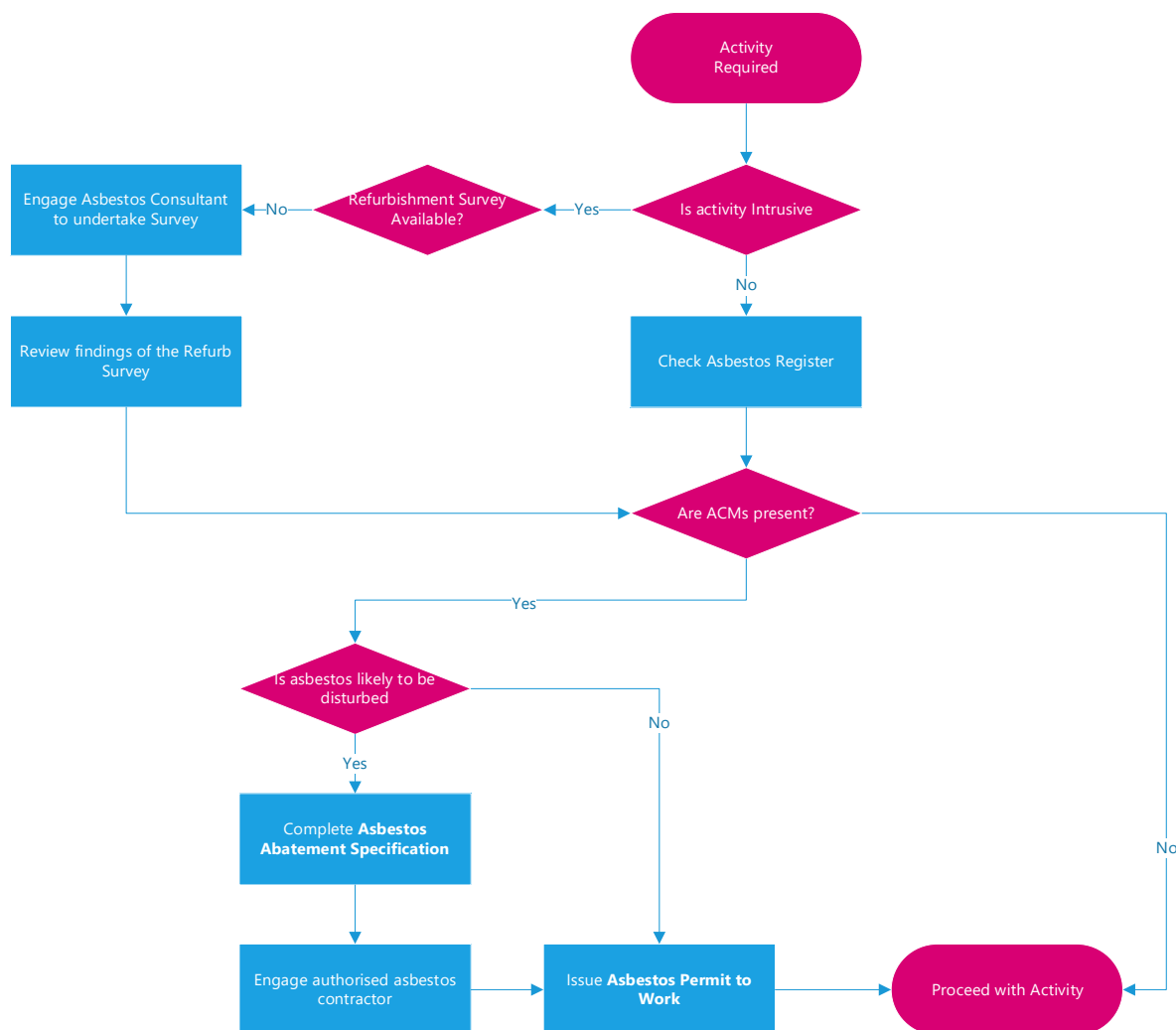
The following sections identify the processes in place for varying work streams at SHARE Multi Academy Trust. It should be noted that training forms an essential part of controlling work but this is specifically documented within section 6.0.

External Companies

When external companies are employed, the asbestos information must be provided prior to the work commencing on-site, typically via email. The person allocating or instructing the work will be responsible for providing this information. Additionally, contractors will be able to access the Asbestos Management Plan at each academy, ensuring they have the latest information before beginning any work.

10.1. Asbestos Management and Permit-to-Work Process

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10.2. Asbestos Process for Reactive Maintenance/Operational Work

Where work is non-intrusive and involves working upon existing and accessible building structures and/or plant and equipment, the management survey information should be sufficient to identify any potential asbestos risks.

The supervisor or person instructing the works will review the asbestos surveys/register for the locations where the work is to be undertaken. If no asbestos is present, or if ACMs are in good condition and will not be affected by the works, the work can proceed. However, it is critical that all individuals undertaking the work are informed of any ACMs identified within the areas of work to ensure they are aware of the potential risks.

An **Asbestos Permit-to-Work** must be completed by the Caretakers for all non-trust personnel (e.g., external contractors) when work is to be undertaken in any area that contains ACMs. This applies even if the work itself does not involve direct interaction with the ACMs. For example, if a contractor is removing a carpet in a room with a ceiling containing asbestos insulating board (AIB), a permit must be issued to inform the contractor of the AIB's presence. This ensures that the contractor is aware of the asbestos risk and can respond appropriately if it is inadvertently disturbed.

If higher-risk or damaged asbestos items are identified, further discussions must be held with the Asbestos Team. While some tasks may proceed using safe systems of work, asbestos abatement may be required before the work can be completed.

10.3. Asbestos Process for Intrusive Works/Projects

Where proposed work (maintenance or project) will involve intrusive or disturbing activities then the existing management survey information is unlikely to be sufficient. In most cases, the planned work will need to have further investigations undertaken in the form of a Refurbishment Survey.

To ensure that the appropriate investigation is undertaken the exact details of the planned work must be provided. It is imperative that the details provided are as comprehensive as possible as they will be used to evaluate the existing asbestos information or to commission additional surveys or inspections.

The person planning the work is required to coordinate these activities with the Asbestos Team to ensure that the scope of works is fully considered. This coordination helps ensure that all potential asbestos risks are identified and managed appropriately before any work begins.

10.4. Instructing Additional Asbestos Surveys/Inspections

It is the responsibility of the person planning the works to engage a Trust-approved Asbestos Consultant to undertake the required refurbishment survey. The Asbestos Team is available to provide advice to ensure that the correct level of detail is provided to the consultant.

Once the survey has been completed, the report will be issued, and the Asbestos Consultant will also be required to provide an excel register of the containing the data from the survey. The report and accompanying spreadsheet should be forwarded to the Asbestos Team to ensure that all new information is uploaded into the asbestos register.

The person instructing the works is then required to review the survey report to assess its suitability for the proposed project works. This review should include ensuring that all areas within the scope of the project have been surveyed and that no limitations exist.

Where asbestos items are identified, arrangements need to be made for their removal or abatement either prior to or as part of the project. The person instructing the works must liaise with the asbestos consultant to prepare a specification for the works required.

By following this process, SHARE Multi Academy Trust ensures that all intrusive works/projects are planned and executed with due consideration to asbestos management, thereby safeguarding the health and safety of all involved.

10.5. Preparing Specifications for Asbestos Works

When works involve the disturbance of known asbestos-containing materials (ACMs), an **Asbestos Abatement Specification** must be developed. This specification will be formulated by the Asbestos Team, utilising the expertise of appointed Asbestos Consultants and considering other external influences as necessary.

For projects where the scope of asbestos-related work is minimal, the Asbestos Team may independently complete the specification, provided that it does not compromise safety or compliance standards.

The Asbestos Abatement Specification must include detailed information on all ACMs involved. Access to the site will be necessary for the Asbestos Consultant to accurately prepare and tailor the specification to the specific needs of the project. This may include adjustments for out-of-hours working, condensed timelines, or extended working weeks as appropriate.

All specifications are documented and made available through the Asbestos Management Portal for consistency, quality assurance, and compliance tracking.

10.6. Instructing Asbestos Removal/Abatement Works

It is the responsibility of the person planning the works to engage a Trust-approved Licensed Asbestos Removal Contractor (LARC) to undertake the required asbestos removal or abatement works.

Once the specification has been prepared, it should be sent to the LARC for review. In the event of emergencies or urgent reactive maintenance, it may not be possible to prepare a detailed specification. In these instances, the Asbestos Team should be consulted to help prepare appropriate information for the LARC. It is essential to arrange for the LARC to attend the site and access all areas where asbestos works are required.

The LARC will submit a quote and complete the pricing/programme schedule within the specification. This will be returned to the person instructing the work along with any details regarding availability and any notice requirements for the proposed work. LARCs will not notify works until an order has been raised.

Once confirmation of the work and indicative timescales/programmes have been received, the person instructing the works should discuss the analytical requirements with the Asbestos Team.

10.7. Categorisation of Asbestos Works

Asbestos work is categorised dependent upon the nature of the work being undertaken, the nature of the product(s) involved and the potential risks presented and control measures required. The Trust require all asbestos work types to be undertaken by their approved LARC.

The Trust will require analytical attendance for all licensed work and any work being undertaken within occupied buildings or in areas immediately adjacent to other persons. Analytical companies must be employed directly by the Trust and should be independent of the LARC.

Licensed Work

Licensed work will typically be work on the higher risk ACMs which includes AIB, thermal insulation and sprayed coatings. This type of work requires notification to the relevant authority a minimum of 14 days prior to commencement on site. Licensed work will typically require enclosing and provisions must be made for decontamination facilities and analytical attendance.

Notifiable Non-Licensed Work (NNLW) Notifiable Non-Licensed Work (NNLW)

Notifiable Non-Licensed Work (NNLW) Notifiable Non-Licensed Work (NNLW) will typically be work on lower risk asbestos products where the condition is poor or the methods used will result in significant degradation of the materials. This type of work requires notification to the relevant authority prior to commencement on site. NNLW will require isolation from other persons/work areas and will often require analytical attendance

Non-Licensed Work

Non-Licensed Work will typically be work on lower risk asbestos products where the materials or methods used present a low exposure potential. Non-licensed work will require isolation from other persons/work areas and will not necessarily require analytical attendance.

Following the completion of any asbestos abatement a completion pack will be required from the LARC and, where used, the Asbestos Consultant. For all works where an Asbestos Consultant has been used, they will be responsible for providing details to update the asbestos register. This will include a summary of all ACMs removed and a details for the scoring of any ACMs remaining. All completion information must be forwarded to the Asbestos Team to update the asbestos register.

10.8. General Contractor Requirements

Prior to commencing work on site, external organisations must ensure that they have received any authorised permit to work (see section 10.8) from the representative in control of the works. This is to ensure that:

- The works comply with CDM Regulations 2015.
- The work is planned in a suitable and sufficient manner.
- All SHARE Multi Academy Trust stakeholders are made aware of the works in advance of the works starting on site.
- The contractor has received suitable and sufficient pre-construction information, particularly highlighting the unique challenges and risks associated with working at a Trust site.
- The contractor has undergone the Academy specific induction.
- Relevant permits to work are already in place.

10.9. Asbestos Permits

All asbestos surveys, air monitoring, and abatement works will require an asbestos permit, which must be approved by the authorised person before any work commences on site.

For any work undertaken in locations where asbestos-containing materials (ACMs) have been identified, an **asbestos permit to work** must be issued. This includes scenarios where the work itself does not involve direct interaction with asbestos materials. For example, if general maintenance is to be conducted on flooring in proximity to an asbestos insulating panel near a window, a permit must still be obtained. This ensures that all contractors or engineers are fully aware of the presence of asbestos materials in their work area and can take appropriate precautions.

The person responsible for instructing the work must submit a completed permit to work form, along with Risk Assessment Method Statements (RAMS), training certificates, and any other relevant documentation to the Asbestos Team for approval. This approval process may take up to five working days.

If there is any change in the scope of the project or work from what was originally specified, additional verification of the asbestos information's relevance and accuracy will be necessary. This requirement applies to changes identified at any stage of the process detailed within this section.

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11. SPECIALIST ASBESTOS SERVICE PROVIDERS

All work or consultancy directly related to asbestos will only be undertaken by Trust-approved specialist providers. Due to the highly prescriptive nature of asbestos legislation and guidance (including licensing and accreditations) and the associated risks, approval will only be issued following consultation and review by the Asbestos Team. Details regarding these specialist service providers and the minimum requirements for each are stipulated below.

11.1. Asbestos Consultants

All asbestos consultancies that undertake work for SHARE Multi Academy Trust will be UKAS accredited to ISO 17020 and ISO 17025 standards. Any of the following companies may be approached to provide surveying, sampling, analytical, specification, or general asbestos consultancy services.

Any order with a value equal to or less than [£15,000] may be directly awarded by the Premises & Compliance Manager. For orders exceeding [£15,000] but lower than [£49,999], require a minimum of 3 independent quotes. For orders exceeding [£50,000] a tender process will be initiated, with all framework and external contractors being invited to provide a price.

This ensures that the Trust receives competitive and compliant service while maintaining high standards of asbestos management and safety.

Company Name	Service Provided	Contact Details
Inspectas Compliance Ltd	- Management surveys - Refurbishment/demolition surveys - Re-inspection of ACMs - Bulk sampling - Analytical monitoring including 4SC	Katie Walker 0844 264 0094 07983 921735 katie@inspectas.co.uk
MCP Environmental	- Management surveys - Refurbishment/demolition surveys - Re-inspection of ACMs - Bulk sampling	James Gregory 01274 601021 jgregory@mcp-environmental.co.uk
Add as applicable	Add as applicable	Add as applicable

As a minimum, all asbestos consultants who undertake works at the Trust must have provided the following documentation to the Asbestos Team for review:

- Evidence of UKAS accreditation to ISO17020 and ISO17025
- Evidence of current public and employer liability insurance
- Evidence of suitable employee training

The checks detailed above have been undertaken for all of the companies appointed as Asbestos approved service providers.

11.2. Licensed Asbestos Removal Contractors (LARCs)

All asbestos works (irrespective of classification – licensed/non-licensed) will be undertaken by LARCs. All LARCs who undertake work at the Trust will hold a full three-year license with no conditions from the Health and Safety Executive (HSE).

Any order with a value equal to or less than [£15,000] may be directly awarded by the Premises & Compliance Manager. For orders exceeding [£15,000] but lower than [£49,999], require a minimum of 3 independent quotes. For orders exceeding [£50,000] a tender process will be initiated, with all framework and external contractors being invited to provide a price.

Company Name	Service Provided	Contact Details
MCP Environmental	- Licensed asbestos abatement - Non-licensed asbestos abatement - Project/work assistance - Asbestos Awareness Training	Mick Turner 01274 601021 07811 476808 mturner@mcp-environmental.co.uk William Metcalfe 01274 601021 07935 778187 wmetcalfe@mcp-environmental.co.uk
Add as applicable	Add as applicable	Add as applicable

12. ASBESTOS INCIDENTS, EMERGENCIES AND REPORTING

Asbestos incidents and emergencies can be categorised as being one of the following:

- Discovery of a suspect ACM
- Disturbance or damage of a known or suspect ACM
- Uncontrolled release of fibres during asbestos abatement works

In any of the instances detailed above the Asbestos Team must be contacted immediately

12.1. Discovery of a suspect ACM

The Trust has comprehensive records regarding asbestos, undertakes additional asbestos surveys for project work and has procedures in place to assess suitability of asbestos information and disseminate it appropriately. However, the potential for the discovery of unknown ACMs remains and the process to follow is detailed below:

- Stop work and contact the person instructing the works and the Asbestos Team immediately.
- If the Asbestos Team are not available (eg out of hours) please contact the asbestos consultants detailed in section 11.1 or ring the emergency contact numbers.
- The Asbestos Team will check the asbestos register and other available reports and

- documentation to identify whether this material has previously been sampled.
- The Asbestos Team will attend site to inspect material, if appropriate sampling will be arranged.
- Where samples are deemed necessary, works may have to cease until confirmation has been received following laboratory analysis.

12.2. Disturbance or Damage to an ACM

Where a material becomes damaged, is disturbed, or it is known or suspected that it is an ACM, it is essential that the following steps are taken to mitigate the risks:

- Stop work and contact the person instructing the works and the Asbestos Team immediately.
- Secure the area and prevent anyone else from accessing this location – signage and barriers as needed.
 - If damaged material is on personnel and/ or clothing they must remain nearby and if possible, be isolated from others.
- The Asbestos Team will check existing asbestos records and attend the site to assess the situation, additional requirements may include:
 - Emergency decontamination of personnel
 - Additional sampling of suspect materials
 - Air testing by the Asbestos Consultant
- Attendance of LARC to undertake emergency removal or making safe works
- All works on site will have to cease until the material can be made safe or removed.

Additional details regarding emergency decontamination procedures and when these may be necessary can be found in the HSE guidance sheet em1 which can be found in **Appendix IV**.

Following these initial steps, it is likely that further planned asbestos abatement will be required following resolution of the immediate concerns.

12.3. Uncontrolled release during abatement works

Where analytical monitoring, associated with asbestos abatement, indicates that elevated airborne fibre levels are present the following must be undertaken:

- Stop works and undertake inspection/assessment of enclosures and/or control measures.
- Secure the area and prevent anyone else from accessing this location – signage and barriers as needed.
- Contact the person instructing the works and the Asbestos Team immediately.
- Undertake emergency decontamination to surrounding area.
- Assess the integrity of the enclosure through visual inspections and smoke testing.
- Re-assess risk assessments and methodology to establish whether changes need to be made.
- Upon works re-commencing initiate additional air leak/reassurance air testing.

12.4. Investigation and Reporting

Any asbestos incidents and emergencies (as detailed above) will require sufficient investigation and subsequent reporting to be completed. This process will typically involve input from those undertaking the works, those who instructed and managed the works and the Asbestos Team.

It is essential that investigations try to identify the root causes and contributing factors to ensure that lessons are learned and, where necessary, that changes are made. The findings from investigations will form an integral part of assessing the suitability AMP and will be considered for inclusion within planned asbestos training.

Additional consideration may need to be given to whether the asbestos incidents resulted in exposure, whether health records require updating and whether the event requires reporting under RIDDOR. Following the initial site attendance and air monitoring the Asbestos Team will liaise with the Director of Operations to discuss any additional requirements.

Where persons have been identified as having been exposed, an accident report form will be completed and sent to the Director of Operations. This information will be included on the persons health record. Investigations will need to consider and accurately document the following:

- The aims of the investigation and process to be used
- Details of the project/work being undertaken/location(s)
- Details of the ACM/extent of disturbance/method of disturbance
- Date/timeline from discovery to resolution including immediate actions taken
- Details of all persons involved
- Assessment of exposure
- Root causes and contributing factors
- Lessons learned and preventative actions including timescales
- Supplementary information - bulk certificates/air monitoring/photographs
- Communication of findings

Any audits, which identify issues or areas of improvement, will be communicated with the relevant director/head/manager who is responsible for the areas identified.

13. AUDITING AND QUALITY ASSESSMENTS

Auditing is essential in assessing the suitability and effectiveness of the AMP – the processes detailed within cover many different areas and these need to be applied by a number of different persons/roles at the Trust. A range of areas will be assessed using a range of auditing techniques to help provide reassurance that the requirements within this document are being followed and are fit for purpose. The Trust Asbestos Team will undertake a range of auditing which will assess the following criteria.

13.1. Auditing of the AMP and Asbestos Processes

	Freq	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Asbestos Policy	1												
Duty Holder Requirements	1												
Key Persons & Responsibilities	1												
Competencies & Training	1												
The AMP Document	2												
Identification of asbestos and the asbestos register	2												
Dissemination of asbestos info	2												
Control of Contractors	1												
Work on building fabric	2												
Asbestos in Projects	1												
Safe Systems of Work	1												

Areas requiring audit will be assessed using a number of methods which will include reviewing external sources such as legislation, guidance and internal points of reference such as organisational structure, lines of responsibility and communication and job descriptions. In addition, representative samples of work, projects, documentation and personnel will be selected to aide these assessments. Details of the indicative audit considerations required are detailed below:

Asbestos Policy audit considerations

- Check for updates in legislation and guidance
- Review the Trust roles/structure
- Review roles documented for review and approval

Duty holder requirements audit considerations

- Check for updates in legislation and guidance
- Review the Trust roles and organisational structure

Key persons and responsibilities audit considerations

- Review the Trust roles and organisational structure,
- Identify if new roles and responsibilities need to be considered
- Interview a sample of persons fulfilling key roles to establish understanding of responsibilities

Competencies and training audit considerations

- Review Asbestos Team personnel and CPD
- Review the Trust asbestos training registers against employee lists and job descriptions/responsibilities
- Review training matrices from specialist asbestos service providers
- Audit a selection of contractors undertaking work at the Trust for asbestos awareness training:
 - Maintenance contractors
 - Project contractors

Asbestos Management Plan document audit considerations

- Review against the requirements of HSG227
- Check for updates in legislation and guidance

Identification of asbestos and the asbestos register audit considerations

- Will be periodically checked upon receipt of reports and certificates from asbestos consultants
- Audit/re-survey a selection of areas to assess suitability and quality of work undertaken
- Audit a random selection of data points (samples, rooms, limitations) identified in survey reports/ re-inspections and analytical completion documents – assess if the register reflects these
- Audit a random selection of data points from within the register and trace these within supporting documentation
- Run and review audit reports from register to assess access and use by the Trust employees

Dissemination of asbestos information audit considerations

- Audit a selection of maintenance jobs and establish what asbestos considerations were undertaken and whether these were appropriate
- Select project(s) to assess what asbestos information was provided and whether this was appropriate

Control of contractors audit considerations

- Audit a selection of contractors undertaking work at the Trust to review
 - How they were instructed
 - Their induction and authorisations
 - Sign off processes upon work completion

Working on building fabric audit considerations

- Audit a selection of maintenance jobs and establish what asbestos considerations were undertaken and whether these were appropriate
- Audit a selection of employees (both operational and management) to assess their understanding of suitability of asbestos information

Asbestos in projects audit considerations

Randomly select project(s) to review and assess an applicable selection of the following criteria:

- Were correct procedures followed?
- Was appropriate asbestos information obtained such as additional surveys and inspections?
- Was asbestos abatement undertaken as per requirements?
- Were the analytical requirements appropriate?
- Has completion paperwork/register update been provided?
- Has sign off from the Asbestos Team been undertaken/documentated?

Safe systems of work (SSOW) audit considerations

- Review of procedures in place and where applicable air monitoring
- Review of areas/locations where SSOW are required

- Audit a selection of employees who utilise asbestos SSOW to assess knowledge

13.2. External Auditing and Assurance

To provide external and independent assurance, Soteria Compliance Ltd will be employed to undertake audits of asbestos management at the Multi-Academy Trust. External audits will be undertaken on a periodic basis or following the identification of significant failings.

14. UPDATING THE MANAGEMENT PLAN

As a minimum, the Asbestos Management Plan will be reviewed and updated on an annual basis. More frequent updates will be undertaken if there are changes within the organisation, processes in place, or if the legislative framework or asbestos specific guidance is updated.

Further review must also be undertaken if anything is encountered which may suggest that the plan is no longer suitable. This may be through (but is not limited to) auditing, incidents, feedback, complaints etc.

Updates to the AMP will be undertaken by the Premises & Compliance Manager and will be forwarded to the Director of Operations for review. The updated AMP will then be sent to the Trust Members for final sign off.

The Director of Operations will present any updates of the AMP to the SHARE Multi Academy Trust Members for sign off and dissemination.

Following approval, the Premises & Compliance Manager will communicate changes/updates to the plan through a combination of the following processes:

- Update AMP document on the asbestos management portal.
- Hold meetings with heads of departments and managers.
- Produce memos highlighting changes.
- Inclusion within asbestos training sessions.

15. Appendix I – Share Mat Premises List

Academy name	Responsibility	Date of Construction	Asbestos Management Survey	Identified Asbestos
Primary Academies				
Lily Park, A SHARE Primary Academy	SHARE MAT	1980s	Yes	Yes
Woodside Green, A SHARE Primary Academy	SHARE MAT	1980s	Yes	Yes
Millbridge, A SHARE Primary Academy	SHARE MAT	Late 1800s	Yes	Yes
Luck Lane, A SHARE Primary Academy	SHARE MAT	New Build	No	N/A
Heaton Avenue, A SHARE Primary Academy	Dalkia	1900s	Responsibility Provided by PFI provider	Yes
Secondary Academies				
Shelley College, A SHARE Academy	SHARE MAT	1970s	Yes	Yes
Whitcliffe Mount, A SHARE Academy	Laing O'Rourke	Post 2000	Not Required	N/A
Thornhill Community Academy, A SHARE Academy	Dalkia	1964	Responsibility Provided by PFI provider	Yes
Royds Hall, A SHARE Academy	Dalkia	Grade 2 Listed 1921	Responsibility Provided by PFI provider	Yes
Todmorden High School, A SHARE Academy	SHARE MAT			

16. Appendix II – Material Assessment Scoring Algorithm

Source: HSG 264 - The Survey Guide: Appendix 4: Material Assessment Algorithm

Sample Variable	Score	Example of Scores
Product type (or debris from product)	1	Asbestos reinforced composites (plastics, resins, mastics, roofing felts, vinyl floor tiles, semi-rigid paints or decorative, finishes, asbestos cement etc).
	2	Asbestos insulating board, mill boards, other low density, insulation boards, asbestos textiles, gaskets, ropes and woven, textiles, asbestos paper and felt.
	3	Thermal insulation (eg pipe and boiler lagging), sprayed asbestos, loose asbestos, asbestos mattresses and packing
Extent of damage/deterioration	0	Good condition: no visible damage.
	1	Low damage: a few scratches or surface marks; broken edges on boards, tiles etc.
	2	Medium damage: significant breakage of materials or several small areas where material has been damaged revealing loose asbestos fibres.
	3	High damage or delamination of materials, sprays and thermal insulation. Visible asbestos debris.
Surface treatment	0	Composite materials containing asbestos: reinforced plastics, resins, vinyl tiles.
	1	Enclosed sprays and lagging, asbestos insulating board (with exposed face painted or encapsulated), asbestos cement sheets etc.
	2	Unsealed asbestos insulating board, or encapsulated lagging and sprays.
	3	Unsealed laggings and sprays.
Asbestos type	1	Chrysotile
	2	Amphibole asbestos excluding crocidolite
	3	Crocidolite
Total Score		

17. Appendix III – Priority Assessment Scoring Algorithm

Source: HSG 227 - A Comprehensive Guide to Managing Asbestos in Premises: Appendix 3: Priority Assessment

Scoring Algorithm

Assessment Factor	Score	Example of Score Variables
Normal occupant activity Main type of activity in area	1	Rare disturbance activity (eg little used store room)
	2	Low disturbance activities (eg office type activity)
	3	Periodic disturbance (eg industrial or vehicular activity which may contact ACMs)
Secondary activities for area	As above	As above
Likelihood of disturbance	0	Outdoors
	1	Large Rooms or well-ventilated areas
	2	Rooms upto 100m ²
	3	Confined Spaces
Accessibility	1	Occasionally likely to be disturbed
	2	Easily disturbed
	3	Routinely disturbed
Extent/Amount	0	Small amounts or items (eg strings, gaskets)
	1	10m ² or ≤10m pipe run
	2	>10m ² to ≤50m ² or >10lm to ≤50lm
	3	>50m ² or >50lm
Human exposure potential Number of occupants	0	None
	1	1 to 3
	2	4 to 10
	3	>10
Frequency of use of area	0	Infrequent
	1	Monthly
	2	Weekly
	3	Daily
Average time area is in use	0	<1 Hour
	1	>1 to <3 hours
	2	>3 to <6 hours
	3	>6 hours
Maintenance activity Type of maintenance activity	0	Minor disturbance (eg possibility of contact when gaining access)
	1	Low disturbance (eg changing light bulbs in asbestos insulating board ceiling)
	2	Medium disturbance (eg lifting one or two asbestos insulating board ceiling tiles to access a valve)
	3	High levels of disturbance (eg removing a number of asbestos insulating board ceiling tiles to replace a valve or for re-cabling)
Frequency of maintenance activity	0	ACM unlikely to be disturbed for maintenance
	1	≤1 per year
	2	>1 per year
	3	>1 per month
Total Score		

18. Appendix IV – Emergency Procedure HSE em1

Source: Health and Safety Executive (HSE) - *Em1 Asbestos Essentials: What to Do if You Discover or Accidentally Disturb Asbestos During Your Work*

Flow chart

