



# ASBESTOS MANAGEMENT POLICY

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Author	Issue Date	Version	Document Ref	Approved By	Approval Date	Next Review	Page
L.Hancock	Feb 2024	V1.4	H&S-07	H&S Comm	Jan 2024	Feb 2026	i

# DOCUMENT CONTROL

## Document Storage

Location: p:\ops team\central policies & procedures - development - word docs\h&s - health & safety policies\h&s-07 - asbestos management policy v1.4.doc

## Version Control Log (Only last 3 versions, earlier versions can be found in the appropriate Archive directory for the document)

Version	Date	Author	Description of Changes
V1.2	Oct 2019	T. Hood	Reviewed, No change
V1.3	Feb 2022	S. Barnes	Reviewed, No changes
V1.4	Jan 2024	H Ali / S Khan	Reviewed, No changes

## Approval

Version	Name	Position	Signature	Approved Date
V1.0	Badger Executive	Executive Team		14/05/2015
V1.4	S Khan	H&S Chair, Deputy CEO	S Khan	26/01/2024

## Glossary

Term	Description

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## 1 PURPOSE

To prevent asbestos exposure to Badger employees and third parties, or where this is not practicable, to reduce the exposure to the lowest possible level.

## 2 SCOPE

All Badger offices and sites.

## 3 REFERENCES

- EU Council Directive 90/394/EEC "The Protection of Workers From The Risks Related To Exposure to Carcinogens at Work"
- The Control of Asbestos at Work Regulations 2006(CAR)
- The Asbestos (Prohibitions) Regulations 1999
- The Control of Substances Hazardous to Health Regulations 2002 (COSHH)
- The Management of Health and Safety at Work Regulations 1999
- The Construction (Design & Management) Regulations 2007 (CDM).

## 4 DEFINITIONS

Asbestos is a generic term for a number of silicates of iron, magnesium, calcium, sodium and aluminium which appear naturally in fibrous form. More specifically, asbestos is defined as any of the following minerals:

- Crocidolite (blue)\*
- Amosite (brown)\*
- Chrysotile (white)\*
- Fibrous actinolite\*\*
- Fibrous anthophyllite\*\*
- Fibrous tremolite\*\*
- Any mixture of these minerals.

(\* used extensively in the UK)

(\*\* Not often used in the UK but may be found in locations outside the UK)

The three major (and virtually untreatable) diseases associated with exposure to asbestos are asbestosis (a form of fibrosis of the lung), lung cancer and mesothelioma (cancer of the pleura and peritoneum). Asbestosis usually takes 15 to 20 years to develop from first exposure and it is possible for sufferers to live for many years with asbestosis, although their quality of living is affected. Mesothelioma is virtually only caused by asbestos exposure and very low levels can cause the cancer to develop. It may take 40 years or more to develop after the first exposure and most people with mesothelioma die within one year of first diagnosis.

Asbestos Containing Material (ACM) - Material containing more than one percent (1%) asbestos by weight.

Presumed Asbestos Containing Material (PACM) - Thermal system insulation and surfacing materials found in buildings constructed prior to January 1, 1981, unless an analysis shows that the material contains not more than 1% asbestos by weight.

Surfacing Materials - Materials sprayed or towelled on surfaces (walls, ceilings, structural members) for acoustical, decorative or fireproofing purposes.

Thermal System Insulation - Insulation used on pipes, boilers, tanks, ducts and various other components of hot and cold water systems and heating, ventilation and air conditioning (HVAC) systems.

AIB – Asbestos Insulation Board

Bitumen – Used on roof surfaces and in moulded fixings (toilet cisterns etc) often contain white asbestos.

## 5 ASBESTOS REGISTER AND DUTY TO MANAGE

All Badger sites will be surveyed if constructed before 2000 to determine whether asbestos containing materials are present. This will either be completed by Badger, the building owner or the landlord (will depend on lease agreements).

It will be presumed that materials contain asbestos unless there is strong evidence to the contrary. This can include detailed plans of removal works or substantial renovation. The amount and condition of the asbestos-containing material will be assessed. A register will be created for each site during the asbestos survey and will be kept up to date with information regarding remedial works, deterioration, disturbance, removals and any newly located ACMs. Where new buildings or parts thereof are acquired by Badger, the company will ascertain the need to include the new acquisition in the asbestos management plan and commission the necessary surveys/inspections to be included in the register.

## 6 APPOINTED PERSON

The appointed person is detailed in the rear of the organisational arrangements document HS-02 and will be responsible for the management of ACMs at each site and other premises under the control of Badger.

Badger will identify an 'appointed person' for each building (with a deputy where necessary) to ensure that ACMs are properly managed. Responsibilities will include the management of the asbestos survey and subsequent asbestos register plus the review of each. The appointed person should be provided with sufficient training in order to carry out the role effectively.

In summary CAR requires Badger to:

- Take reasonable steps to determine the location of materials likely to contain asbestos
- Presume that materials contain asbestos, unless there are good reasons not to
- Make and maintain a written record of the location of the ACMs and PACMs
- Assess and monitor the condition of ACMs and PACMs
- Assess the risk of exposure from ACMs and PACMs
- Prepare a written plan of the actions and measures necessary to manage the risk (i.e. the 'management plan')
- Take steps to see that these actions are carried out.

## 7 THE MANAGEMENT PLAN

All known ACMs will be subject to periodic inspections by a competent person. The period between inspections will vary depending on the risk assessment findings. Each new inspection should be recorded on the asbestos register.

To comply with the regulations Badger will:

- Keep and maintain an up-to-date record of the location, condition, maintenance and removal of all ACMs on the premises (asbestos register)
- Repair, seal or remove ACMs if there is a risk of exposure due to their condition or location
- Maintain ACMs in a good state of repair and regularly monitor their condition
- Inform anyone who is liable to disturb the ACMs about their location and condition (e.g. electrical contractors)
- Having arrangements and procedures in place so that work which may disturb the ACMs complies with CAR 2006

- Establish emergency procedures to ensure any accidental exposure is dealt with quickly and correctly
- Review the plan at regular intervals and make modifications if circumstances change.

## 8 ASBESTOS SURVEYS

Surveys and inspections will be completed on a regular basis at suitable intervals, as identified in the management plan. Accredited and competent personnel / contractors will be used.

## 9 MANAGEMENT SURVEYS

A management survey will be adopted by Badger when the site (or other building) is in normal use. This is a standard survey will be arranged by the competent person it will involve site personnel, may involve some minor intrusive work and can be either presumptive or can utilise the sampling of materials for laboratory analysis, or a combination of the two approaches. The purpose of this type of survey is to locate, as far as is reasonably practicable, the presence, extent, location and condition of ACMs. This information is then used to create a risk-based asbestos register.

## 10 REFURBISHMENT / DEMOLITION SURVEY

This type of survey will be necessary when the building is due to be refurbished or demolished or have a major upgrade i.e. when materials will be disturbed. This will be a fully intrusive survey to identify as far as reasonably practicable all ACMs where the “work is taking place or in the case of demolition the entire building.”

## 11 MONITORING ARRANGEMENTS

Known ACMs will be subject to periodic monitoring and inspections undertaken by either trained in-house staff or appointed asbestos consultants.

## 12 TRAINING

Affected staff and those with specific responsibilities will complete training in regard to asbestos awareness and the management of materials.

Safety Coordinators / Representatives will attend training courses where asbestos awareness is a key element.

## 13 WORK WITH ASBESTOS MATERIALS

Work with some ACMs may not require a licence e.g. asbestos cement, bitumen, plastic, resins, rubber, textured coatings and paints and work of a short duration on materials otherwise requiring a licence. The HSE provides information regarding safe working with these types of materials. However the work will still require a suitable risk assessment and development of a method statement or safe working procedure before proceeding.

No Badger employee will at any time carry out any work on any asbestos containing materials.

## 14 MANAGEMENT OPTIONS

Once an ACM has been risk assessed there are several management options available including;

<b>Monitor</b>	Periodic inspections at intervals of e.g. 3, 6 and 12 months depending upon the risk priority
<b>Label</b>	Known asbestos is labelled, and/or included within A “permit to work” scheme, or fixed with an appropriate warning sign. <b>Please note:</b> <i>Not all known ACMs are likely to be labelled - but they will be recorded on the asbestos register.</i>
<b>Protection /</b>	Some of the asbestos may be protected by a physical barrier, such as a timber casing.

<b>Enclosure</b>	The casing is sealed and as airtight as possible to prevent the migration of fibres.
<b>Sealed/ Encapsulate</b>	There are two methods of encapsulation: (i) applying a durable layer adhered to the surface of the ACM, such as PVA or (ii) a material that penetrates the ACM before hardening which locks the material together.
<b>Repair</b>	Repair should only be undertaken if the damage is slight. There are a number of methods including filling, wrapping and isolated encapsulation. All repairs will be carried out by approved contractors using non-asbestos materials.
<b>Permit to Work</b>	Permit to Work procedures should apply to areas that contain asbestos which have been identified as high risk. A permit to work should be obtained from the Safety Coordinator prior to any works commencing.
<b>Periodic Air Test</b>	Where there is a large amount of asbestos in a confined space with a history of unauthorised disturbance, periodic air tests may be necessary to monitor asbestos fibre levels to confirm that it is safe to access the area. This should be coupled with the permit to work
<b>Remove</b>	The HSE recommend against unnecessary removal of asbestos since if removal is undertaken without due consideration there is a potential to increase the risk of harm (release of fibre). ACMs should only be removed where it is found to be in poor condition and / or repair, or it is impossible to undertake maintenance works without disturbing the material, or refurbishment or demolition works are due to be undertaken.

## 15 AN UNCONTROLLED ESCAPE OF ASBESTOS FIBRES

In the event that damage occurs to an ACM or suspected ACM it is imperative that all Badger personnel within the area must leave immediately and the area should be isolated until further advice can be sought from a competent person e.g. Vita Safety, asbestos consultant or Badger appointed person. Vita Safety, the Safety Coordinator should be contacted. At no time should any person enter the contaminated area. A plan will then be established by Vita Safety and the competent contractor for e.g. asbestos removal and decontamination, air testing etc. The area may need to remain closed until a certificate of reoccupation is issued.

## 16 WARNING LABELS

Warning labels should be labelled with approved asbestos warning labels at suitable physical intervals to be clearly visible.

