

 WARWICKSHIRE POLICE		POLICY
Security Classification	OFFICIAL	
Disclosable under Freedom of Information Act 2000	Yes	

POLICY TITLE	Asbestos Management
REFERENCE NUMBER	WP113
Version	V2.2

POLICY OWNERSHIP	
DIRECTORATE	ENABLING SERVICES
BUSINESS AREA	ESTATES, FACILITIES AND HEALTH AND SAFETY

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RISK RATING	MEDIUM
EQUALITY ANALYSIS	LOW
TIER	2

Warwickshire Police welcome comments and suggestions from the public and staff about the contents and implementation of this policy. Please e-mail Policiesandprocedures@warwickshire.police.uk

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1.0 POLICY OUTLINE

Warwickshire Police occupy a variety of properties of different age and construction types. It is known and recorded that Asbestos Containing Materials (ACMs) are present in a number of these premises.

- 1.0.1 The use of systematic assessments and the reduction of risks in relation to ACMs present in Force buildings will be undertaken to ensure the health, safety and welfare of staff or other person through any uncontrolled exposure to asbestos.
- 1.0.2 Warwickshire Police have a responsibility to reduce the organisations detrimental impact on the local environment by promoting environmental best practice and to exceed aspirations.

1.0.3 Warwickshire Justice Centres – For the Avoidance of Doubt

This policy does apply to the Warwickshire Justice Centres as Warwickshire Police has responsibility for the running and maintenance of both Leamington and Nuneaton Justice Centres.

1.1 Compliance

The policy has been prepared taking into account existing legislation and the individual working practices of the force. New legislative requirements or changes in current legislation may necessitate a review of this policy.

- 1.1.1 It is the aim of this policy to ensure that Warwickshire Police complies with all applicable legislative controls relating to the management of Asbestos Containing Materials (ACMs):
 - a. Safely manages ACMs and presumed ACMs in premises where the organisation has “duty holder” responsibility under Regulation 4 of the Control of Asbestos of Regulations 2012 (CAR 2012) - ‘Duty to Manage in Non-Domestic Premises’;
 - and
 - b. staff do not work on or with ACMs.
- 1.1.2 The term ‘staff’ refers all Police Officers, Police Staff, OPCC staff, volunteers, contractors, and agency workers.
- 1.2 The policies of Warwickshire Police are intended to promote equality, eliminate unlawful discrimination and actively promote good relationships regardless of:

- a. Age
- b. Disability
- c. Gender Reassignment
- d. Race,
- e. Religion or Belief
- f. Sex
- g. Sexual Orientation
- h. Marriage & Civil Partnership
- i. Pregnancy & Maternity

- 1.3 The policy has been assessed as having a LOW potential impact using the equalities impact assessment template, by incorporating equality considerations into the policy process, has allowed the force to identify any actual or potential equalities and reduce them as much as possible, by applying the policy differently or looking for alternatives.

1.4 Freedom of Information

On behalf of the Warwickshire Police and the Police & Crime Commissioner, the Enabling Services Department maintains a list of owned and leased property. Inappropriate disclosure of such information has the potential to undermine the effectiveness of the service in its provision of law enforcement and to jeopardise the Health & Safety of staff and the public. Disclosure of this detail will only be made to authorised personnel.
(Freedom of Information Act 2000, sections 31 and 38)

2.0 PURPOSE OF THE POLICY

This policy covers all police officers, police staff and any external contractors dealing with asbestos risk and describes the procedures that must be followed.

- 2.1 All staff are required by law to co-operate with Warwickshire Police on Health and Safety Matters. This includes compliance with this Policy.
- 2.2 Any work with asbestos carried out on behalf of Warwickshire Police will be in accordance with the:
- a. Control of Asbestos Regulations (CAR) 2012, the relevant Approved Codes of Practice and associated guidance documents;
 - b. The Health and Safety at Work etc Act 1974; and
 - c. The Management of Health and Safety at Work Regulations 1999.
 - d. The Environment Protection Act 1990
 - e. Pollution Prevention and Control Act 1999
 - f. Water Industry Act 1999
 - g. Construction Design Management regulations 2015
- 2.3 Warwickshire Police is committed to ensuring the health, safety and welfare of its staff, visitors, contractors, residents and any other users of its buildings, facilities or services. Where these services or facilities are provided by

suppliers (including contractors, subcontractors, and any other partner organisations), those providers will be subject to an appropriate and proportionate assessment of their health and safety (H&S) policy and arrangements.

3.0 DEFINITIONS

3.1 Duty holder – The definition of a duty holder is every person who has:

- a. an obligation of any extent in relation to the maintenance or repair or means of access to force premises;

or

- b. control of premises or any means of access, and where there is more than one such duty holder, the relative contribution to be made by each such person will be determined by the nature and extent of the maintenance and repair obligation owed by that person.

3.2 ACMs – The terms ACMs in this policy describes both known asbestos containing materials and those presumed to contain asbestos.

3.3 Materials assessment

The purpose of surveying is to make a “materials assessment”, i.e.

- a. To find ACM and record what it is, where it is and how much there is
- b. To record how accessible it is, its condition, and any surface treatment
- c. To record the asbestos type, by sampling or by presuming

3.4 There are two types of survey for ACM

3.4.1 Management survey

The Management Survey purpose is required to manage ACM during the normal occupation and use of premises. The duty-holder can make a Management Survey where the premises are simple and straightforward. Otherwise, a Surveyor is needed.

3.4.2 A Management Survey aims to ensure that:

- a. nobody is harmed by the continuing presence of ACM in the premises or equipment
- b. that the ACM remain in good condition
- c. that nobody disturbs it accidentally

3.4.3 The Survey must locate ACM that could be damaged or disturbed by normal activities, by foreseeable maintenance, or by installing new equipment. It involves minor intrusion and minor asbestos disturbance to make a Materials

Assessment. This shows the ability of ACM, if disturbed, to release fibres into the air. It guides the client, e.g. in prioritising any remedial work.

3.4.4 Refurbishment / Demolition Survey

The Refurbishment / demolition Survey is required where the premises, or part of it, need upgrading, refurbishment or demolition.

3.4.5 In this type of survey, where the asbestos is identified so that it can be removed (rather than to 'manage' it), the survey does not normally assess the condition of the asbestos, other than to indicate areas of damage or where additional asbestos debris may be present. However, where the asbestos removal may not take place for some time, the ACMs' condition will need to be assessed and the materials managed.

3.4.6 A Refurbishment / Demolition Survey aims to ensure that:

- a. nobody will be harmed by work on ACM in the premises or equipment
- b. such work will be done by the right contractor in the right way

3.4.7 The Survey must locate and identify all ACM before any structural work begins at a stated location or on stated equipment at the premises. It involves destructive inspection and asbestos disturbance. The area surveyed must be vacated and certified 'fit for reoccupation' after the survey.

4.0 IMPLICATIONS OF THE POLICY

4.1 Legal

The legal basis for this policy is found in existing legislation and developed to consider the requirements of the Health and Safety at Work etc Act 1974 and relevant subordinate legislation made under it.

4.1.1 The Control of Asbestos Regulations 2012 place a legal duty on those persons who control nondomestic premises to manage the risks from asbestos. Within that duty is the requirement to undertake a suitable and sufficient assessment to determine whether asbestos is liable to be or is present in the premises.

4.2 Equalities Act

The Force is committed to ensuring that service users and staff are not discriminated against because of any of the nine protected characteristics as defined in the Equalities Act 2010.

4.3 Financial

There are no additional financial implications for the Warwickshire Police & Crime Commissioner in applying this policy.

4.4 Staff / Training

To ensure the competency of the Enabling Services Department's representative to effectively manage the procedures of this policy and in respect to the management and implementation of this policy staff will be made aware of their responsibilities business leads will identify and coordinate any relevant training required via the Force Learning & Development Department.

4.4.1 In line with Regulation 10, CAR 2012, suitable and sufficient training will be provided to relevant staff:

- a. that in their current roles may come into contact with and have the potential to disturb ACMs;
- b. who by the nature of the work they undertake are likely to inadvertently disturb ACMs; or
- c. with responsibilities to manage asbestos;
- d. who have management responsibilities for asbestos within the estate; and
- e. supervisors of such people.

4.4.2 A register of all staff as identified above will be maintained by the Duty holder.

4.5 Bureaucracy

The minimal additional bureaucracy created by this policy is necessary to meet the Force's responsibility to meet its environmental and social responsibilities.

5.0 CONSULTATION

5.1 Version 1.0 of the policy was circulated for consultation, prior to consideration by the Joint Negotiating Consultative Committee (JNCC) Consultation included all interested groups which consisted of 31 individual members of staff, of which 7 responded, their comments were addressed and where appropriate included in the policy. Further amendments have been minor and not required wide consultation.

6.0 DOCUMENT HISTORY

- 6.1 The policy will be subject of an annual review.
The history of the policy will be recorded using the chart below:

Date	Author / Reviewer	Amendment(s) & Rationale	Approval / Adoption
Nov 2014	Kim James	Harmonisation	JNCC 27/11/2014
Sept 2016	Clive Griffiths	Updated to take into account role of PPL- replacing Estates	February 2017
May 2018	Clive Griffiths	Reviewed – No changes, title should be policy/ procedure	May 2018
Aug 2021	Helen Minett	Updated to take into account the end of the Alliance and of PPL	August 2022
June 2023	Helen Minett	Review – update reference to the Estates, Facilities & Health and Safety Manager and the Facilities Manager to reflect the changes to their job titles – Senior HSEQ & Facilities Manager and HSEQ & Facilities Manager	
Nov 23	Helen Minett	Review – change references to Senior HSQE and Facilities Manager to Senior HSQE and Estates Manager	
Jan 2024	Helen Minett	Review – updated legislation references	Jan 2024
Jan 2025	Shane Wilton	Review – change references to Strategic HSQE and Estates Manager	
June 2026	A Roede ARK H&S / Nathan Moore	Change of Estates Manager title to Estates and HSQE Manager	Sept 2025
May 2026	Mandy Harvey	Section 1.0.3 amended to include both Justice Centres.	Republished 23/06/2026

7.0 STATEMENT OF INTENT

- 7.1 In pursuit of achieving and maintaining effective management of the risk posed by the presence of ACMs and to comply with the requirements of the CAR 2012 and the Health and Safety at Work Act 1974 (HSWA 1974) for all non-domestic premises where the Force is a duty holder Warwickshire Police will;

Step	Action
1	take reasonable steps to locate materials likely to contain asbestos (ACMs) and check their condition;
2	presume that materials contain asbestos unless there is strong evidence to suppose they do not;
3	make a record of the location and condition of ACMs and presumed ACMs in the form of an asbestos register and keep the register up to date;
4	assess and keep under review the risk of the likelihood of anyone being exposed to ACMs and presumed ACMs; and
5	implement the asbestos management plan when materials are identified either as containing asbestos or assumed to contain asbestos.

7.2 Making an assessment as to the presence of ACMs:

Any building included in the Force estate as of 31/12/2014 has been subjected to a Management Survey. Any newly acquired or occupied buildings will be subject to a survey in compliance with HSG 264 "The Survey Guide" and any resurveys of existing building will be surveyed to this standard.

- 7.3 Where refurbishment, redevelopment or demolition works are planned we will ensure that a suitable and sufficient assessment of whether ACMs are present is made.

This will involve a HSG264 Refurbishment and Demolition Survey (intrusive asbestos survey) being carried out in sufficient time to allow;

- the identification of ACMs in the project area; and
- any subsequent adjustment of the risk prior to the work commencing.

- 7.3.1 Where this is commissioned by the Force the information will be provided to all contractors involved in order that they can undertake a subsequent risk assessment of the ACM impact as required under Regulation 6 of CAR 2012.

7.4 Accredited Organisations:

The Force will only employ organisations that are appropriately UKAS accredited to advise, assist and guide Warwickshire Police in the continued safe management of asbestos.

- 7.4.1 This will ensure that organisations employed can demonstrate;

- a. competence (including training and experience in such work)
- b. impartiality, independence, and integrity
- c. an adequate quality management system; and
- d. work being undertaken is in accordance with the Approved Code of Practice (ACoP) and guidance for the services.

7.5 Time Schedules for Asbestos Records

The requirements for retention of records are as follows:

Asbestos Inspections (cf Control of Asbestos at Work (Regulations 1992, SI 1992 no. 3068)	Review 40 Years after issue
Asbestos Registers SI 1992, No. 3068	Review 40 Years after date of last entry.
Asbestos Incidents. – Correspondence, reports and papers.	Review 40 Years after date of event.
Health Surveillance (including medical reports)	40 Years after last record

7.6 Licensed Asbestos Contractor (LAC)

The force will only employ contractors that hold a license, issued by the Health and Safety Executive, to work with asbestos insulation, asbestos coating and asbestos insulation board, as defined in the Asbestos (Licensing) Regulations 1983.

8.0 MANAGEMENT RESPONSIBILITY

The primary duty holder under the Control of Asbestos at Work Regulations 2012 is the Office of the Police and Crime Commissioner.

- 8.1 The Office of the Police and Crime Commissioner for Warwickshire Police – will delegate to the Deputy Chief Constable the overall responsibility to ensure that this policy is implemented, and that appropriate funding is made available.

8.2 Deputy Chief Constable

The Deputy Chief Constable is the Chief Officer with functional responsibilities for estates, building matters and staff training.

- 8.2.1 The Deputy Chief Constable has delegated the task of ensuring the management of all ACMs located within owned or leased Warwickshire Police buildings to the Estates and HSQE Manager:
- a. To be responsible for the implementation of Force policy and procedures.
 - b. Ensuring reasonable budgetary provision is made to ensure that suitable and sufficient resources are allocated to fulfil the requirements

of the policy and the asbestos management plan are met and compliance with the Regulations governing the Employers duties regarding the provision of fire safe buildings.

- c. Ensuring reasonable budgetary provision for carrying out remedial works identified by the risk assessments

8.3 Estates and HSQE Manager

- a. Implementation of Force policy and procedures.
- b. Asbestos policy, strategy for implementation, resources allocation and monitoring.
- c. Provision of adequate resources for training.
- d. Provide advice and guidance to Senior Officers and Head of Digital Services as appropriate and as requested.
- e. Staff training (Asbestos) – Identification of staff training requirements (for the Estates, Facilities and Health and Safety team).

- 8.3.1 The Estates and HSQE Manager has delegated the task of ensuring that all ACMs located within owned or leased Warwickshire Police are managed by the HSQE & Facilities Managers.

8.4 HSQE Facilities Managers

- a. Organisation of annual inspections of identified ACMs in each building.
- b. To ensure annual management inspections and the management priority risk assessments of ACMs identified in the asbestos registers are carried out.
- c. Provide advice and guidance to Senior Officers, Heads of Service, Head of Digital Services and Project Managers as appropriate and as requested.
- d. Maintenance and updating of survey records at each site.
- e. Responsibility for ensuring that the Asbestos Register is readily available to contractors.
- f. Responsibility for raising technical queries with the third-party Asbestos Management specialists.
- g. Responsible for the provision of a current copy of the building Asbestos Register to prospective purchasers / lessee or their agents when a building is to be disposed of or let.

8.5 Contractors

- a. Responsible for consulting the Asbestos Register prior to commencing any works on site.
- b. Responsible for informing the Facilities Manager of the building of any problems relating to the ACMs while working on site.
- c. Responsible for ensuring that ACMs are never used in building repairs, maintenance or any other form of work.

8.6 Estates Project Managers

- a. Responsible for consulting any existing Asbestos Registers or records of ACMs present on the site.
- b. Responsible for making a judgement as to whether a Demolition/Refurbishment survey is required and to commission a survey on Capital Works.
- c. Responsible for making a judgement as to whether a Demolition/Refurbishment or Management survey is required on Minor New Works and to advise the HSQE & Facilities Manager that a survey is required prior to any work being started.
- d. Responsible for contacting the HSQE & Facilities Manager to advise of any works that are taking place which involve the encapsulation or removal of identified ACMs.
- e. Responsible to notify the HSQE & Facilities Manager of any consequential updates to the Building Asbestos Register.

8.7 Any other person commissioning / completing any works in buildings (i.e. not part of the Estates and Facilities Management team)

- a. Responsible for notifying the HSQE & Facilities Manager of any works which effect the fabric of the building e.g. running an IT cable through a wall attaching fixtures and fittings to walls.
- b. No works are to be completed without the permission of the Estates and Facilities Management Team.

Appendix A: Glossary

1.0 The Police & Crime Commissioner

A legal entity, enabled to contract with other legal entities. Owns and maintains all property used by Warwickshire Police

The Police & Crime Commissioner for Warwickshire has a portfolio of approximately 28 buildings providing accommodation from which it delivers policing services to the communities of Warwickshire.

2.0 The Force

Warwickshire Police covers the 764 square miles of Warwickshire, it serves a population of 568,167 (2019) and employs 1060 police officers, 101 specials and 722 police staff, including 78 community support officers (accurate at the time of update).

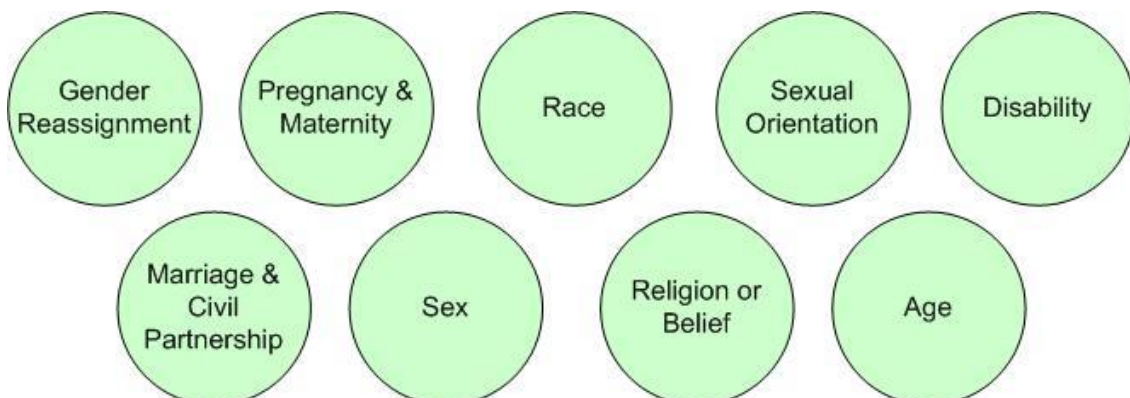
3.0 Contractor

Any person or undertaking or other legal entity entering into; or involved with a contract with the organisation for the supply of goods or services, including subcontractors (hereafter called contractors) and staff employed by the Force carrying out construction work.

4.0 Staff / Volunteers

Any person employed by the PCC / Force or its contractors, or those operating in a voluntary capacity. This includes any person not specifically referred to above

5.0 The Equalities Act 2010 – (The nine defined protected characteristics):



6.0 USEFUL LINKS

The following links contain useful information:

<http://www.legislation.gov.uk/uksi/2012/632/contents/made> - Asbestos Regulations

<http://www.hse.gov.uk/pubns/books/hsg248.htm> - The Analysts' Guide for Sampling, Analysis and Clearance Procedures

<http://www.hse.gov.uk/pubns/books/hsg247.htm> - The Licensed Contractors' Guide

<http://www.hse.gov.uk/pubns/books/hsg264.htm> - The Survey Guide

<http://www.hse.gov.uk/pubns/books/l127.htm> - The Management of Asbestos in Non-Domestic Premises