Oxford Diocesan Schools Trust
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Central:	Trust-wide, applicable at trust and school levels. Schools may not make any changes or adaptations

Asbestos Management Policy

Approved by:	**Finance & Estates Committee**
Date:	**July 2026**
Next review date:	**31 July 2028**

Adopted by school:	**St John's CE Primary School**
Date:	**September 2026**

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Statement of intent

ODST understands that, as a proprietor and employer, the overall management of health and safety in all central trust buildings and the buildings of all constituent academies within the trust is ultimately the responsibility of the board of trustees. The board of trustees recognises that any asbestos found in any trust buildings must be managed properly, because the health and wellbeing of our pupils, staff and visitors is of the utmost importance.

This policy abides by the law stated in the Control of Asbestos Regulations 2012 and the Health and Safety at Work etc Act 1974. If there is an incident of asbestos exposure in any of our buildings, the trust will take the necessary steps to ensure that everyone is safe and, unless the incident is minor, will report it to the HSE.

1. Legal framework

This policy has due regard to legislation and guidance including, but not limited to, the following:

- The Control of Asbestos Regulations 2012
- Health and Safety at Work etc Act 1974
- The Hazardous Waste (England and Wales) Regulations 2005
- The Control of Substances Hazardous to Health Regulations 2002
- Environmental Protection Act 1990
- The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013
- The Safety Representatives and Safety Committees Regulations 1977
- The Health and Safety (Consultation with Employees) Regulations 1996
- The Construction (Design and Management) Regulations 2015
- The Management of Health and Safety at Work Regulations 1992
- DfE (2020) ‘Managing asbestos in your school or college’
- [New] DfE (2022) ‘Good estate management for schools’

This policy operates in conjunction with the following school policies:

- Asbestos Management Plan
- Health and Safety Policy
- COSHH Policy
- ODST Management of Contractors Policy

2. Roles and responsibilities

The duty holder for asbestos in the Oxford Diocesan School Trust is the board of trustees.

The board of trustees is responsible for:

- The overall management of health and safety in its academies, including asbestos management.
- Appointing a Lead for Asbestos Management within the Trust.
- Ensuring that the headteacher of each constituent school of the trust has been appointed to be the School Responsible Premises Manager, responsible for the day-to-day management of asbestos in their individual school.
- Ensuring that all staff with delegated responsibilities for health and safety and premises management are appropriately trained to manage asbestos incidents.
- Ensuring that the annual health and safety training undergone by all staff covers asbestos and the importance of being aware of the risk.
- Regularly monitoring the effectiveness of the arrangements to control asbestos risk.
- Engaging with unions on the effective management of asbestos.

The ODST Lead for Asbestos Management will be responsible for:

- Holding a current Duty to Manage Asbestos and Asbestos Awareness recognised qualification.
- Ensuring ODST only employ competent specialist contractors for surveys, inspections, advice and removal.
- Monitoring Asbestos in schools. (The ODST Appointed Person will arrange 5 yearly Management Surveys by a specialist contractor.)
- Preparing, reviewing and updating the Asbestos Register and site plans for each constituent school.
- Preparing, reviewing and updating the Asbestos Management plans for each constituent school.
- Providing details of approved specialist contractors as required for additional surveys and specialist asbestos advice e.g. Refurbishment and Demolition (R&D) surveys, air sampling and bulk sampling.
- Preparing bespoke training materials for each constituent school. (Detail the location of ACMs / include an instruction not to disturb ACMs / explain what must be done if ACMs become damaged.)
- Completing pre-site arrival checks of Asbestos contractors arranged by the Trust.
- Collating and storing evidence. (Following asbestos removal, repair work and safe site reoccupation, for example: certificate of reoccupation, statement of cleanliness, disposal documentation.)
- Testing the resilience of the asbestos management plan. This is to check the procedures for a range of scenarios, for example: planned and unplanned work, accidental disturbance of ACM's.

The headteacher (Responsible Premises Manager and/or deputy) of each constituent school is responsible for:

- The day-to-day management of health and safety issues such as asbestos in their individual school.
- Liaising with the school's local governing body and the board of trustees on the arrangements in place for managing the risk of asbestos.
- Keeping the school's local governing body and the board of trustees up-to-date with asbestos management practices and the level of asbestos risk.
- Informing the school's local governing body and the board of trustees in the event that any asbestos-containing materials (ACMs) are disturbed.
- Providing information about the presence of asbestos and the management arrangements in place to parents.
- Informing those affected by the disturbance of ACMs and the release of asbestos fibers within their constituent school.
- Asbestos records on a day to day basis.
- Ensuring the location of ACMs are identified by signage.
- Ensuring all staff and visitors know what to do in the event of an accidental disturbance.
- Ensuring all staff and visitors know who to contact in an emergency.
- Deliver contractor site inductions and ensuring contractors employed directly by the school hold Asbestos Awareness training to the appropriate level. (ODST Contractors Policy.)

All staff across the trust are responsible for:

- Knowing the location of ACMs in their school.
- Knowing what to do in the event of an accidental disturbance.
- Knowing who to contact in an emergency

The maintenance and cleaning staff in each school will be responsible for:

- Knowing the location of ACMs in their school.
- Knowing what to do in the event of an accidental disturbance
- Knowing who to contact in an emergency

Contractors and relevant visitors will be responsible for:

- Knowing the location of ACMs where they are working.
- Knowing what to do in the event of an accidental disturbance
- Knowing who to contact in an emergency

3. Management survey of asbestos containing materials (ACMs)

The board of trustees will delegate to the ODST Lead for Asbestos Management the following;

An Asbestos Management Survey will be carried out for all trust buildings, including every building of each constituent school within the trust. The survey will record the location and condition of asbestos in all trust buildings constructed before 2000, and will identify what types of ACMs are present and where they are. This will be carried out every 5 years. If a school has a clear survey the 5-year frequency can be extended following discussions with the ODST appointed Person and the implementation of a specific site Risk Assessment.

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

The ODST Lead for Asbestos Management along with the School Responsible Premises Manager or their deputy will be responsible for cooperating with the surveying organisation and will ensure the organisation has access to all areas of the school needed to complete the survey. Following the survey, the headteacher will follow any recommendations, including the removal of high-risk occurrences of asbestos. Based on the findings of the survey, the ODST Lead for Asbestos Management will compile an asbestos register for the school showing the locations of all ACMs within the building. Any areas that were inaccessible to the surveying organisation will be clearly recorded, and additional surveys will be taken regarding these areas where any work will be undertaken in or around these areas in line with the 'Building and maintenance work' section of this policy.

4. Risk assessment

The ODST Lead for Asbestos Management will work with the surveying organisation to assess the level of risk tied to each identified occurrence of asbestos. As part of the management survey, the surveying organisation will conduct a 'material' assessment which will assess each item of ACM identified in terms of the type of material, the type of asbestos it contains, its surface treatment and the extent of damage.

The ODST Lead for Asbestos Management with support from headteachers conduct a 'priority' assessment to determine the likelihood of ACMs being disturbed. This assessment will be based upon:

- The number of people using the room containing ACMs.
- The amount of time generally spent in the room.
- The risks that the age group of any pupils with access to the room may pose to the integrity of ACMs.
- The location, accessibility and extent of the asbestos.
- The frequency and type of activity that might disturb the ACMs.

The ODST Lead for Asbestos Management will combine the material and priority assessments to form the 'total' assessment which will provide the foundation for an Asbestos Management Plan.

5. The asbestos register

The asbestos register is formed by the combination of the asbestos location register and the asbestos risk assessment to offer an overall picture.

The register will include:

- Drawings and photographs, where relevant.
- The location, accessibility, extent and condition of the ACMs.
- The forms and material types of ACMs.
- What the ACMs look like.
- The associated risk assessment of ACMs.
- A clear indication of parts of the building where the presence of ACMs is presumed.
- Any areas which were not captured within the management survey and where the presence of asbestos cannot be ruled out – these areas will undergo a further survey ahead of access.

The ODST Lead for Asbestos Management with the School Responsible Premises Manager or their deputy will update the asbestos register periodically to reflect the current status of the ACMs within the buildings. Where further asbestos materials have been identified or removed during refurbishment work, this will be recorded.

The asbestos register for each school will be reviewed annually or if any work is undertaken by the ODST Lead for Asbestos Management with the School Responsible Premises Manager or their deputy and any changes will be communicated to all relevant staff.

The ODST Lead for Asbestos Management along with the School Responsible Premises Manager or their deputy will ensure that an up-to-date copy of the asbestos register is in place for the school.

6. Asbestos Management Plan

The ODST Lead for Asbestos Management with the School Responsible Premises Manager or their deputy will work together to develop an Asbestos Management Plan for each constituent school to set out the day-to-day management arrangements for controlling the risks from ACMs during regular activities on the premises. The School Responsible Premises Manager or their deputy will brief all staff on the contents of the plan and will ensure that maintenance and cleaning staff are particularly aware of its contents.

The ODST Lead for Asbestos Management will ensure that the Asbestos Management Plan assumes that AMCs are present around structural columns and beneath casings and claddings, unless they know for certain this is not the case. Where there is any uncertainty about the level of risk from presumed or 'hidden' asbestos, the ODST Lead for Asbestos Management will secure professional advice and follow all relevant HSE guidance.

Each Asbestos Management Plan will include the following information as it pertains to the individual school:

- The leadership statement on ownership of the risk and training arrangements for staff, including clear roles of specific individuals, the type of training undertaken and by whom, and the dates training was undertaken
- Plans for any necessary work identified from the risk assessment, both for any remedial work and for ongoing management actions
- The asbestos register, which brings together all the available and relevant information, including pictures
- Ongoing arrangements to monitor and record the condition of ACMs
- Arrangements for actively managing the potential risk from presumed or hidden asbestos
- Procedures for controlling routine maintenance work undertaken at the school
- Arrangements for the management of any construction or maintenance work – this should identify the checks to ensure that the correct controls and that competent HSE-licensed contractors are used
- Emergency procedures to be actioned in the event of inadvertent disturbance of ACMs both within and outside the normal opening hours
- Communication arrangements for sharing the plan with staff and visitors (anyone who is liable to disturb asbestos materials as identified through a risk assessment)
- The reporting and escalation procedures where any damaged asbestos is noted

Each Asbestos Management Plan will include governance arrangements, including:

- Nomination of those who can make entries or amendments to the plan
- The formal arrangements for reviewing and updating the plan
- The location of all asbestos-related documentation, as well as back-up and business continuity arrangements

The ODST Lead for Asbestos Management puts each Asbestos Management Plan in place They will also ensure that management arrangements across the trust are effective during school closure periods when staff presence is minimal.

Each school will update its Asbestos Management Plan and asbestos register as circumstances change, and at least annually. The ODST Lead for Asbestos Management will liaise closely with the board of trustees through any reviews, and will work with the board of trustees to address any identified changes or areas for improvements. The School Responsible Premises Manager or their deputy. will be responsible for communicating any changes to staff.

The Asbestos Management Plan will also be updated if:

- There are changes in the identified responsible people or organisations.
- New information is received, e.g. from ‘refurbishment and demolition’ surveys.
- Work is undertaken on ACMs.
- Damage to asbestos areas occurs.
- ACMs are removed.
- Significant building works are undertaken which might complicate the documented location of ACMs.

Further information about each constituent school’s management arrangements can be found in that school’s Asbestos Management Plan.

7. Building and maintenance work

Any building and maintenance work planned on any of the trust buildings will first be approved by the board of trustees, or through any scheme of delegation that the Trust puts in place. If concerns arise that building and maintenance work may disturb hidden ACMs, the ODST Lead for Asbestos Management will arrange for a refurbishment and demolition survey to be carried out in the area where the work is set to take place. Due to the intrusive nature of this survey, it will be carried out under controlled conditions. These surveys will be passed on to those who will eventually take on the work.

Small, short duration tasks may be carried out by non-licensed workers, provided that they have the appropriate information, instruction and training, and the correct measures are taken. Higher risk work, such as the removal of asbestos, will be completed by a contractor licensed by the HSE. The school may need to notify the HSE of some types of non-licensed work.

Once work is appropriately authorised, contractors will be prepared for the unexpected presence of ACMs. If further ACMs or suspect materials are uncovered, the work will stop, the area made safe, and the work reassessed before continuing.

Asbestos-containing waste will be properly contained and disposed of in accordance with the Hazardous Waste Regulations 2005, and the school's Health and Safety Policy. Where the work has been contracted out, disposal is the responsibility of the contractor, although the board of trustees will have responsibility for obtaining a waste consignment note to confirm that the asbestos was appropriately disposed of.

The ODST Lead for Asbestos Management with the School Responsible Premises Manager or their deputy will ensure that all staff and other stakeholders are informed of the proposed works. The ODST Lead for Asbestos Management with the School Responsible Premises Manager or their will consult with union health and safety representatives in a timely manner on matters relating to the planned work.

8. Asbestos-related incidents

If anyone within the trust finds that there has been, or may have been, an unplanned disturbance of asbestos, the following action will be taken:

- All activities will stop and everyone will be evacuated from the affected area.
- The ODST Lead for Asbestos Management will be notified immediately, even if the incident is minor
- Staff, pupils and visitors will not be allowed to re-enter the affected areas until any necessary remedial action has been taken
- Items, including equipment, books, or personal belongings, will not be moved from the area
- Staff, pupils, parents and visitors will be given relevant information to understand the risks and advised to consult their doctor if required.
- Advice will be sought from an asbestos expert regarding remedial action
- Unless the incident is minor, the board of trustees will notify the HSE, as this is a legal requirement under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013
- Contractors will follow their own procedures to deal with the unintended or unexpected release of asbestos
- Anyone who has come into contact with asbestos, and is concerned about their exposure, will be advised to contact their GP

The school's Asbestos Management Plan will detail the procedures for staff to follow in the event of an incident, and this will be communicated to all staff.

9. Communication and training

The ODST Lead for Asbestos Management will be delegated to by the board of trustees to inform staff, volunteers and other stakeholders of all locations of ACMs and how they could be damaged and disturbed. The ODST Lead for Asbestos Management will ensure that all these people receive the correct information, instructions and training, and will be clear in what precautions to take.

The ODST Lead for Asbestos Management will be delegated to by the board of trustees to ensure plans are in place to ensure that if emergency services request information about the asbestos that is present in any trust buildings, information will be provided to help keep emergency service workers safe.

10. Monitoring and review

This policy will be reviewed every two years or if there are changes to legislation by the board of trustees and will be approved by the chair of trustees. Any changes to this policy will be communicated to all members of staff, visitors and stakeholders.