

**SITE ASBESTOS MANAGEMENT
PLAN
FOR
44b Portland Road
South Norwood
SE25 4PQ**



**Corporate Resources
London Borough of Croydon
Bernard Weatherill House
Level 7, Zone A
8 Mint Walk
Croydon
CR0 1EA**

Date of Inspection – 08/12/2017

RELEVANT CONTACTS

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ITEMS REMOVED SINCE PREVIOUS SURVEY/REINSPECTION

Item(s) Removed	Removal Date	Removal Contractor	Consignment Notes (Y/N)
N/A	N/A	N/A	N/A

ITEMS PLANNED FOR REMEDIAL WORKS BEFORE NEXT SURVEY/REINSPECTION

Item(s)	Planned Remedial Date
N/A	N/A

SITE ASBESTOS MANAGEMENT PLAN

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1) INTRODUCTION

The objective of this Site Asbestos Management Plan is to ensure all reasonable steps are taken to prevent the risk of exposure of staff, contractors and visitors to asbestos in a manner that could adversely affect their health. This plan aims to cover processes and procedures for managing ACMs (Asbestos Containing Materials) under the responsibility of the facilities department. Each site within scope for asbestos management under FM (Facilities Management) will have an individual management plan specific to that site, a hard copy of which will be held in the premises log book for each site. This is overarched by the Corporate Asbestos Management Plan which is managed and maintained by FM.

The presence of ACMs does not in itself constitute a danger. However, they are hazardous when disturbed or damaged and must be treated accordingly. It is therefore FM's policy that unless damaged, that all ACMs shall remain in situ and managed in accordance with this plan.

2) LBC ASBESTOS MANAGEMENT POLICY

LBC (London Borough of Croydon) is committed to providing a safe environment for its employees, contractors and visitors, by conducting its business in a way that protects the health, safety and welfare of each individual.

LBC is committed to:

- Ensuring the effective application of the Site Asbestos Management Plan, plus all associated procedures to reduce as far as reasonably practicable the risk of exposure to asbestos fibres
- Ensuring that suitable arrangements are in place to enable staff, who may during the course of their work encounter asbestos, to attend asbestos awareness training appropriate to their area of work and level of responsibility/duty
- Providing an asbestos register, detailing the location of all known ACMs within all its maintained properties
- Implementing an effective asbestos management strategy, based on an overall risk assessment (material and priority), to ensure that all asbestos-containing materials are managed safely
- Undertaking periodic reinspections and when required, commission further surveys in order to ensure that all ACMs have been identified and addressed prior to commissioning/undertaking any form of refurbishment work
- Regularly review the Site Asbestos Management Plan

In the majority of council premises, this is a shared responsibility between the Council and staff on site who are in occupation on a day to day basis.

3) THE CONTROL OF ASBESTOS REGULATIONS 2012

3.1) The Duty Holder

On the 6th April 2012, The Control of Asbestos Regulations 2012 came in to force. These regulations, place a responsibility on the 'Duty Holder' to manage the risks associated with asbestos. To do this, the duty holder should implement these steps:

- Record the location and condition of materials containing asbestos via an Asbestos Register
- Assess the risk from the material and develop an Asbestos Management Plan which sets out in detail how the 'Duty Holder' is going to manage the risk from this material
- Implement and maintain the Asbestos Management Plan which is likely to involve regular monitoring of the asbestos condition, and encapsulation, repair or removal if required
- Maintain the Asbestos Register
- Provide information on the location and condition of the material to anyone who is liable to work on or disturb it.

The 'Duty Holder' under these regulations, is the person/organisation who legally has maintenance and repair responsibilities for any part of a premise.

Under the current regulations all employers have a legal duty to ensure that employees or other persons are not exposed to asbestos containing materials. Accurate information on asbestos containing materials must be provided by 'The Duty Holder' under Regulation 4 as detailed in the Control of Asbestos Regulations (CAR) 2012 to anyone at risk from asbestos.

All personnel who carry out maintenance, refurbishment etc. must be made aware of the Asbestos Register.

3.2) The Asbestos Register

The asbestos register is provided to enable the fulfilment of the asbestos management duties.

It is also to refer to when people in the premises are likely to disturb the fabric of the building. This will most likely be consultants and contractors involved in building and maintenance tasks to the structure and systems of the buildings. The register can be found in appendix A of this document and forms a vital part in assessing the location and condition of each identified ACM.

"An essential part of the duty to manage is making sure that information on the location and condition of the asbestos containing material (ACM) is passed on to contractors and other workers who may carry out work on the fabric of the building that could damage/disturb asbestos. This allows them to put in place appropriate controls to protect themselves and others in the building"

There is also a statutory requirement to inform the emergency services, particularly London Fire Brigade, about the presence of asbestos in LBC premises. The asbestos register helps to fulfil this requirement, a copy of which is readily available in the premises logbook at each site.

Important Note: If an area in the premises cannot be accessed or inspected then it must be presumed to contain asbestos unless there is strong evidence that it does not, e.g. glass, wood, brick do not contain asbestos.

4) ROLES AND RESPONSIBILITIES

4.1 Facilities Management	<p>Facilities Management (FM) are responsible for:</p> <ul style="list-style-type: none"> • Managing all aspects of asbestos work on LBC maintained properties, including carrying out periodic inspections/surveys and organising (with the assistance of external framework consultants/licensed contractors) abatement/remediation works. • Ensuring that all contractors/consultants working with/under their control are provided with a copy of the asbestos register prior to commencing work and that appropriate consideration is given to identifying suitable working methods that prevent damage/disturbance of ACMs. • The provision of suitable asbestos awareness training to those individuals who as part of their daily activities may come into contact with ACMs and can also facilitate suitable training for employees within other departments.
4.1.1 Head of FM	<p>The Head of FM has overall responsibility for ensuring asbestos is properly managed within LBC maintained properties. At times when the asbestos surveyor and property maintenance manager are unavailable, the head of FM will address any queries in relation to asbestos.</p>
4.1.2 Property Maintenance Manager	<p>The Property Maintenance Manager advises the Head of FM about the resources considered necessary to safely manage ACMs within LBC maintained properties and ensures operational compliance with the LBC Site Asbestos Management Plan and Procedures through the effective application of the resources made available. At times when the asbestos surveyor is unavailable, the property maintenance manager will address any queries in relation to asbestos.</p>
4.1.3 Asbestos Surveyor	<p>The Asbestos Surveyor is deemed to be the person, who on a day to day basis is responsible for the implementation of the asbestos policy and procedures by:</p> <ul style="list-style-type: none"> • Assessing, revising and recommending management actions in light of surveys/re-inspection findings and changes in legislation and good practice; • Overseeing asbestos work contracts including the selection of competent contractors; • Day to day management of asbestos related issues; Coordinating and undertaking reinspections of all identified or presumed ACMs

	<ul style="list-style-type: none"> • Regularly reviewing strategic asbestos management processes • Holding discussions with members of FM and other LBC services with maintenance and construction responsibilities and acting upon the outcome of such discussions as is appropriate via the Asbestos Working Group • Co-ordinating operational requirements specified within the site asbestos management plan, including monitoring, encapsulation, and asbestos removal; • Ensuring appropriate staff have suitable training with respect to asbestos in conjunction with the property maintenance manager; • Ensuring continued compliance with relevant legislation concerning asbestos; • Consulting the asbestos register, and ensuring a pre refurbishment/demolition survey is undertaken as appropriate prior to any refurbishment/demolition works taking place • Arranging & co-ordinating asbestos remedial/removal works • Coordinating actions required in an asbestos related emergency.
4.1.4 LBC Building Surveyors	<p>LBC Building Surveyors are responsible for:</p> <ul style="list-style-type: none"> • Carrying out periodic ACM reinspections within the corporate buildings • Reporting any incidents/breaches of health and safety to the asbestos surveyor; • Consulting the asbestos surveyor regarding any asbestos issues.
4.2 Health & Safety Consultant Service	<p>The Health & Safety Consultant Service is responsible for:</p> <ul style="list-style-type: none"> • Investigating asbestos incidents • Issuing briefings regarding asbestos incidents • Assisting in reviewing the LBC site asbestos management plan • Providing asbestos awareness training
4.3 Property Information Officer	<p>The Property Information Officer is responsible for:</p> <ul style="list-style-type: none"> • Updating the asbestos register; • Maintaining the asbestos database; • Providing access to the asbestos register & management plan as required, including on site files
4.4 LBC Project Managers/ Building Surveyors/ Engineers	<p>LBC Project Managers/ Building Surveyors/ Engineers are responsible for ensuring that they comply with this Management Procedure and are also responsible for:</p> <ul style="list-style-type: none"> • Reporting any incidents/breaches of health and safety to the Asbestos Surveyor; • Ensuring staff are conversant with asbestos management procedures specific to their work area

	<p>and attend appropriate asbestos awareness training where required.</p> <ul style="list-style-type: none"> • Liaise and seek advice from the asbestos surveyor on any proposed changes within the workplace, which may potentially affect the building fabric • Liaise with the asbestos surveyor to ensure the site asbestos management plans are kept up to date • Liaise with the asbestos surveyor to instruct R&D surveys for sufficient pre-construction information • Adhering to the asbestos policy <p>Prior to commissioning works to a contractor, they are required to check the asbestos register, ensure that the risk assessment and method statement prepared by the contractor encompasses this information and that the work is planned and managed in a way that prevents disturbance of the ACMS.</p>
4.5 Site Staff	<p>Members of staff should:</p> <ul style="list-style-type: none"> • Comply with the Control of Asbestos Regulations 2012 and Council Asbestos Policy. • Notify FM if any suspect material is discovered / disturbed. • Ensure that no work is carried out within the building without consulting the site asbestos management plan first. <p>All building alterations and refurbishment work must be organised and coordinated by FM. Under no circumstances should staff be allowed to undertake this type of work. If alterations/refurbishments are required, then FM must be contacted and the requirements discussed.</p>
4.6 External Asbestos Consultants	<p>External Asbestos Consultants provide a multitude of services that are accredited by the United Kingdom Accreditation Service (UKAS) and offer such services as and when required:</p> <ul style="list-style-type: none"> • The analysis of bulk materials for the presence of asbestos • Air monitoring • Reinspections • Management and Refurbishment/Demolition Surveys • Project management
4.7 External Contractors	<p>External Contractors working for or on behalf of LBC are responsible for:</p> <ul style="list-style-type: none"> • Ensuring that all employees under their control abide by the rules and conditions set out by the LBC asbestos policy • Ensuring that all employees under their control reference the site asbestos management plan and understand its content and actions required. This must be done prior to any works commencing

	<ul style="list-style-type: none"> • Before commencing any work the contractor must comply with current legislation in relation to safe working with and around asbestos containing materials. • Ensure that all employees under their control are provided with adequate equipment, information, training and instruction to enable them to work with, or adjacent to, ACMs without risk to health and safety
4.8 Other LBC Council Departments	Other LBC Council Departments have responsibility for ensuring asbestos is properly managed within their service contracts and/or occupancy agreements and will use the Corporate Asbestos Management Plan as a benchmark for achieving this

5) ASBESTOS CONTROL ARRANGEMENTS

5.1) Site Asbestos Management Plan

FM has commissioned asbestos management surveys across its property portfolio in order to identify ACMs and clarify the condition of such. It should be noted, that whilst these management surveys will identify a vast amount of the ACMs previously utilised in building materials across the estate, ACMs will remain undetected in areas that are outside the remit of a management survey and within those areas that were not possible to access at the time of the survey. Given these restrictions, it is quite probable that ACM's will remain undetected within the building fabric/structure.

LBC operates and maintains the site asbestos management plan and each premises must retain, on site, an up to date copy of their extract of the register within the site specific management plan.

The register must be kept as a 'living' document that will develop over time as more information is obtained.

Owing to the number of premises and the impracticality of identifying the composition of all building materials used in them, the register can never be a 100% accurate record of all asbestos that has, historically, been used. Some existing asbestos surveys may indicate that no asbestos is present; however, this should not be assumed to be absolutely reliable. In particular where work is to be carried out which exposes ducts, voids or other previously concealed areas, a risk assessment must be undertaken before the start of any building work.

5.2) Updating the Site Asbestos Management Plan

To fulfil its purpose, it is absolutely essential that the site asbestos management plan continues to be a 'living' document. For this to be so it must be regularly updated to take account of any asbestos materials which may be removed, any which may change condition or if additional information is obtained from further sampling.

Any change in the use of an area or room can have an impact upon the risk assessment of an asbestos element and its management requirements be it duration, purpose or personnel etc.

Because there is the possibility that important asbestos-related information may not get recorded on the register, the holder of the maintenance responsibility should ensure that their surveyors and engineers and / or their consultants report:

- Adverse results of periodical condition monitoring
- Damage inflicted on any known asbestos element
- New discoveries of asbestos
- The results of any material or air sampling, both positive and negative results
- Any treatment or encapsulation of an asbestos element
- The removal of an asbestos element (a copy of a hazardous waste consignment note and any associated air monitoring will be required as proof of removal)
- Any change in use of the room / area where an asbestos element is situated.

These reports must be made available to the asbestos surveyor & property information officer in writing by using the form shown in **Appendix D**. Once updated the asbestos register will be re-issued on LBC Intranet website, and an up to date hard copy will be delivered to site.

5.3) ACMs Reinspection (Monitoring) Regime

All ACMs left in situ must be periodically reinspected by a competent person. This is undertaken in order to ensure that the condition of the material remains unchanged. Information collated during these inspections must be used to update the site asbestos management plan, and appropriate action taken regarding any recommendations made. The frequency for this is currently annual although this will be subject to review following an analysis of ACMs and their likelihood of disturbance over the next year.

The activity of reinspections is managed and monitored by the Asbestos Surveyor.

Note: Even if the condition of an asbestos element has not changed since it was last assessed, it must still be recorded.

5.4) Communicating and Sharing the Site Asbestos Management Plan

Note: Regulation 12 of the Management of Health & Safety at Work Regulations 1999 requires an employer to provide health and safety information to people working on their premises that are not in their employment.

All members of staff and contractors should be familiar with the site asbestos management plan and should be made aware of the location of the Asbestos materials within their workplace. A copy of the most updated site management plan will be held in TF Cloud for each individual site. A hard copy will also be stored in the premises log book for contractors to refer to prior to commencing any works.

5.5) Training

Appropriate training must be provided for those involved in the operation of the asbestos management plan and those whose normal duties may bring them into contact with ACM's.

Training should include:

- Understanding the contents and location of the asbestos register
- Understanding of the use of asbestos in buildings

- How to avoid exposure
- Risks posed to staff and contractors by exposure to asbestos
- What to do if you find asbestos

LBC complies with Regulation 10 of the Control of Asbestos Regulations 2012: Information, Instruction and Training, by providing Asbestos Awareness training through the online module for all Council staff who are liable to be exposed to asbestos. In addition, the asbestos surveyor will undertake site specific walkthroughs with its in-house staff to provide first-hand experience on the different applications of asbestos in its buildings. This exercise is to be logged each time it is undertaken.

5.6) Licensed Asbestos Removal Contractors

The asbestos surveyor will co-ordinate all aspects of asbestos work including abatement/remediation works undertaken by licensed asbestos contractors, together with all investigative and reassurance activities.

5.7) Refurbishment and Demolition Work

For demolition or major refurbishment work, Project Managers / Consultants should contact the asbestos surveyor to arrange for a refurbishment & demolition survey to be undertaken. For minor maintenance or refurbishment work reference to the asbestos register extract is normally sufficient although vigilance is still required on the part of the contractor carrying out the works.

All new asbestos elements (i.e. those not shown in the asbestos register extract) discovered by all further surveys should be notified to the Asbestos Surveyor.

If the 'new' asbestos elements are to be removed then this should also be communicated to the asbestos surveyor. If the asbestos is to remain in situ then the asbestos surveyor should be notified so that a risk assessment can be arranged and an appropriate entry made in the asbestos register extract.

- **Refurbishment & Demolition Survey:** This survey type should always be undertaken prior to any demolition work or major refurbishment to ascertain the full extent of any asbestos which may be present.

Note: A Refurbishment & Demolition survey is very destructive so if conducted far in advance of the intended work and re-occupation is intended before this work commences, then repairs will have to be undertaken after the survey in order to make the premises habitable again. External contractors are able to make safe any areas of intrusion but if the building is to be reoccupied for a length of time following the survey then further making good may be required. This requirement will be agreed during the planning stages.

Asbestos surveying functions should only be undertaken by companies who are accredited to EN 45004 or ISO 17020 by the United Kingdom Accreditation Service (UKAS).

All asbestos surveys must be carried out in accordance with HSE guidance HSG264 'Asbestos, The Survey Guide'.

5.8) Asbestos Removal and Disposal

Licensable work with ACMs should only be removed by **LBC approved contractors**, who are licensed by the Health and Safety Executive to undertake such works. Non-licensed work should also be done by LBC approved contractors, utilising appropriate tools and personal protective equipment. All of the above should be supported by an appropriate plan of works/RAMS which will demonstrate that ACM's will be removed safely and in accordance with the Control of Asbestos Regulations 2012. Access to the asbestos removal area of a notifiable ACM is prohibited until such time as a 'certificate of re-occupation' has been issued by a UKAS accredited analyst.

Asbestos waste should be double-bagged in heavy-duty polythene bags and clearly labelled before it is transported to a disposal site. The waste can only be disposed of at a site licensed to receive it and the duty holder has a Duty of Care to ensure that the contractors dispose of the waste properly.

The disposal should only be carried out by Contractors who hold licenses to carry Controlled Waste by road and, if necessary, certification for the holding and transfer of Controlled Waste.

Asbestos waste, whether in small amounts or large scale waste removed by contractors, is subject to waste management controls set out in the Hazardous Waste (England and Wales) Regulations 2005, the Control of Asbestos Regulations 2012 and the Carriage of Dangerous Goods (etc...) Regulations 2009 (CDG 2009).

Appropriate records of all disposals must be obtained by the asbestos surveyor who will upload them onto the asbestos database.

5.9) Policy On Labelling Of ACM's

Labelling is to be undertaken as a separate exercise and following issue of the survey report. LBC will apply the following labels wherever an ACM is identified:



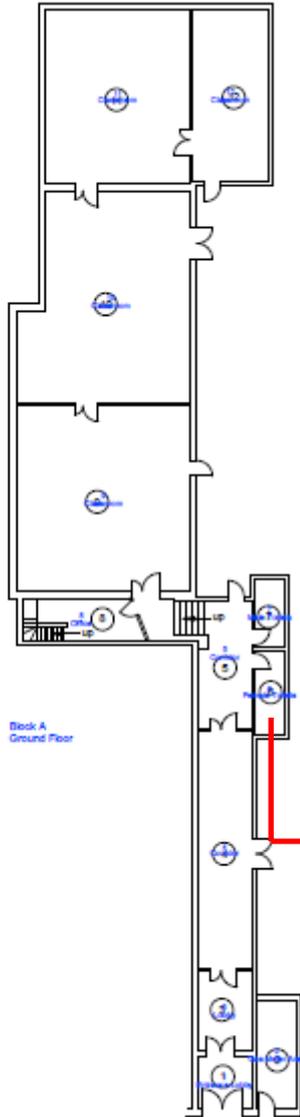
5.10) General LBC Requirements on Working With Asbestos

- All work and removal of asbestos is to be undertaken in accordance with current legislation and guidance
- Where asbestos insulation residue has been identified that any drilling into the building fabric in those identified areas should be done in a controlled manner and only by licensed asbestos removal contractors
- Due to the difficulty in removing asbestos containing bitumen adhesives when removing floor tiles and coverings, this should be done only when absolutely necessary. This ACM can remain in situ and be concealed with a self-levelling compound with a record made in the asbestos register

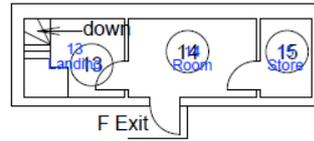
APPENDIX A
ASBESTOS
REGISTER/PLANS

Site 44b Portland Road South Norwood SE25 4PQ		Surveyed By Invicta (BS16606)	Date of Reinspection 08/12/2017	Reinspected By Martin Burt (Croydon Council)		Material Assessment (MA) Scores				Priority Assessment (PA) Scores														
Entry	Floor Level/Location	Description	Photo	Sample Ref	Sample Result	Product Type	Extent of Damage/Deterioration	Surface Type/Treatment	Asbestos Type	Main Type of Activity in Area	Normal Occupant Activity			Likelihood Of Disturbance			Human Exposure Potential				Maintenance Activity			Total (MA + PA) 9 or lower = Very Low 10-12 = Low 13-15 = Medium 16 or higher = High
											Location	Accessibility	Extent/Amount	Average	Number of Occupants	Frequency of Use of Area	Average Time Area in Use	Average	Type of Maintenance Activity	Frequency of Maintenance Activity	Average			
1	Block A Ground Floor (06) Female WC	Bitumen backing to red floor tiles		BS166006/2	Chrysotile	1	1	0	1	1	2	2	1	2	2	3	1	2	0	1	1	9	Manage & Monitor	
2	Block A Ground Floor Cupboard in (10) Classroom	Accessed - no suspect materials found																					No further action required	

- Key Locations:
- 0 Block Structure
 - 1 Entrance Lobby
 - 2 Gas Meter Area
 - 3 Lobby
 - 4 Corridor
 - 5 Corridor
 - 6 Female Toilets
 - 7 Male Toilets
 - 8 Office
 - 9 Classroom
 - 10 Classroom
 - 11 Classroom
 - 12 Classroom
 - 13 Landing
 - 14 Room
 - 15 Store



Block A
Ground Floor



First Floor Plan

Block A
First Floor

Entry 1
Bitumen backing to red floor tiles

APPENDIX B
CONTRACTORS LOG

Record of Inspections of Asbestos Register

Premises/Site:

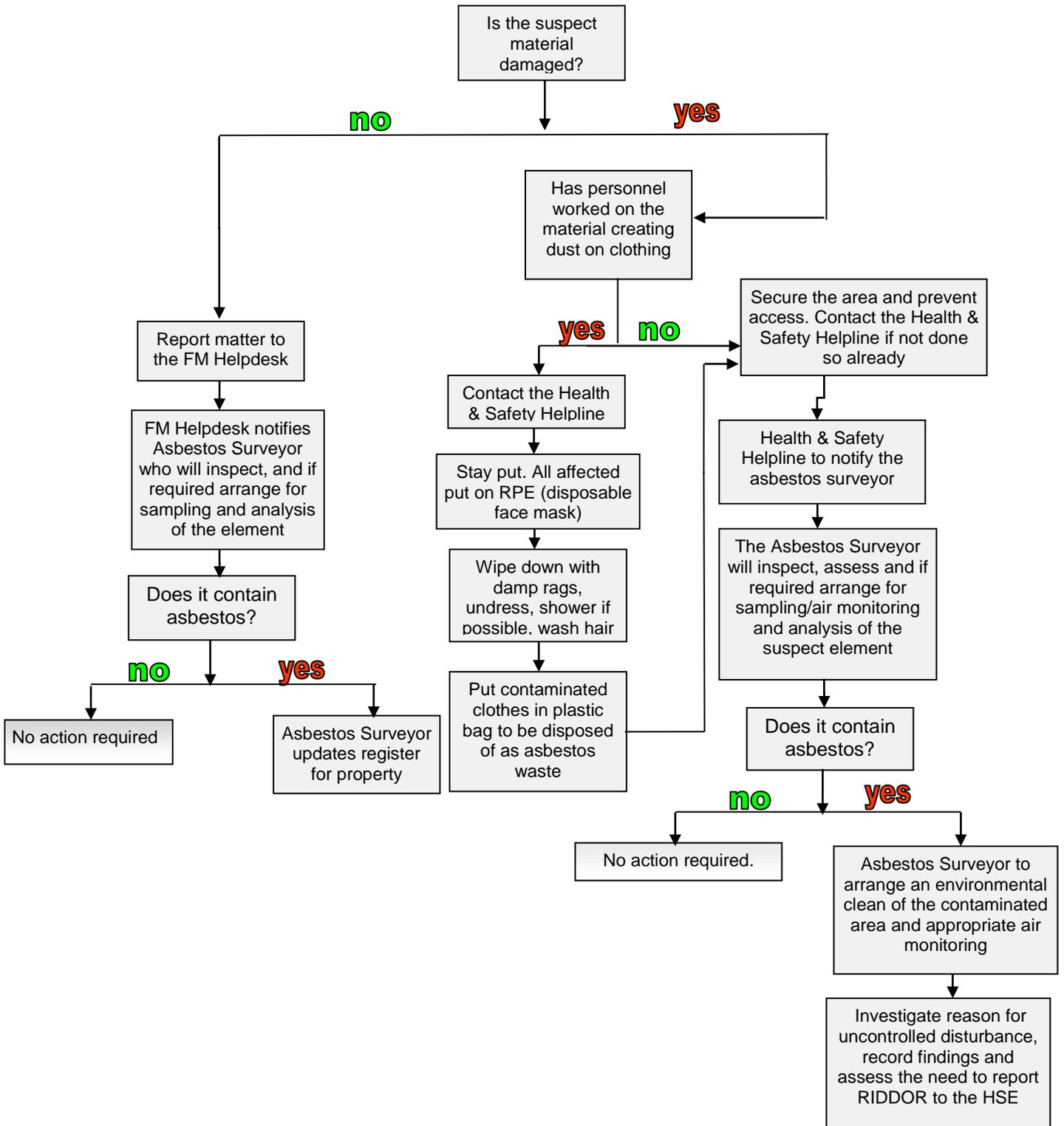
This sheet should be signed by all those prior to carrying out work on the above premises (including voluntary workers or staff). Persons signing this sheet are signing to say that they have seen the asbestos register and checked whether there is any known or presumed asbestos in their area of work and that they will refrain from disturbing any ACM's identified in the register for the tasks they are carrying out. If any suspect materials are uncovered during their work then they are to stop work immediately, report the item to the FM helpdesk and fill in the amendment form in appendix E.

Date	Company Name	Work being carried out	Name of person who has checked the asbestos register	Signature

Note: The register records the results of a survey in respect of visible suspect materials only and will not identify asbestos containing materials that are located in inaccessible parts of the premises or are concealed within structure or fabric of a building. If the contractor encounters any suspected asbestos-containing material that has not previously been identified he must immediately stop work, inform the site manager and seek instructions from his supervisor. Refer to process map in appendix C for procedures to follow.

APPENDIX C EMERGENCY PROCEDURES PROCESS MAP

WHAT TO DO WHEN YOU UNCOVER SUSPECT ASBESTOS MATERIALS?



APPENDIX D
ASBESTOS AMENDMENT
FORM

a) Name & Address of Premises			
(b) Name and Signature			
(c) Contact Telephone No.			
(d) Date Amendment Sent		Tick	Now complete the appropriate section below
(e) Reason for Notification	1. Deterioration of ACM on register	<input type="checkbox"/>	
	2. Discovery of asbestos not on register	<input type="checkbox"/>	
	3. Treatment or encapsulation of an asbestos element	<input type="checkbox"/>	
	4. Removal of an asbestos element	<input type="checkbox"/>	
	5. Change of use of room/area where an asbestos element is situated	<input type="checkbox"/>	

1. Deterioration of ACM on register	
(h) Asbestos sample ref. on register	
(i) Location of asbestos element	
(j) Description of condition change / damage	

2. Discovery of Asbestos Not on Register	
(i) Location of asbestos element	
(k) Form of asbestos element	
(l) Asbestos type	
(m) Name of asb. analytical company	
(n) Sample report ref.	(Attach copy)

3. Treatment or Encapsulation of an Asbestos Element	
(h) Asbestos sample ref. on register	
(i) Location of asbestos element	
(o) Treatment carried out	
(p) Name of asb. treatment company	
(q) Date of works	
(r) Air monitoring cert. ref.	(Attach copy)

4. Removal of an Asbestos Element

(h) Asbestos sample ref. on register	
(i) Location of asbestos element	
(s) Name of asb. removal company	
(t)* Four stage air clearance cert. ref.	(Attach copy)
(u)* Background/Reassurance cert ref	(Attach copy)
(v) Waste consignment note ref.	(Attach copy)
(w) Date of works	

* Usually one or the other of these certificates is expected to be received.

5. Change of Use of Room / Area Where Asbestos is Situated

(h) Affected asbestos sample ref. on register	
(x) Description of room / area change	

Please return this form to the address below and check that you

Have attached the relevant documents.

**Asbestos Surveyor, London Borough of Croydon,
Bernard Weatherill House, Floor 7, Zone A, 8 Mint
Walk, Croydon CR0 1EA**

Documents

Air test certificates
Consignment note (if removal)
Removal notification (if
removal)

APPENDIX E
RECORD OF SUSPECTED
EXPOSURE TO ASBESTOS

A copy of this form should be given to the employee and the original kept on the employee's personnel record. This record should be kept by the employer for **40 years**.

Personal Details

Name: _____ Date of Birth: _____

Address: _____ Job Title: _____

During the course of my work on(date) I discovered what I believe to be asbestos, the details of this being as follows:

Name of Establishment / Address where exposure suspected to have occurred.

Address: _____

Post code: _____

Location of suspected asbestos (Block/Floor Level/Room):

Exact location (e.g. Fireplace):
Specify use if known (e.g. bath splash panel)
Asbestos accidentally damaged/disturbed by you: Yes <input type="checkbox"/> No <input type="checkbox"/>
Asbestos damaged/disturbed before work: Yes <input type="checkbox"/> No <input type="checkbox"/>
Type of work being done:
Equipment being used:

Signature of employee: _____

LINE MANAGER TO COMPLETE MANAGEMENT INVESTIGATION FORM AND TO FORWARD THE TWO FORMS TO HEALTH & SAFETY CONSULTANCY