



Department of
Education

ASBESTOS MANAGEMENT PLAN

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15 December 2015		2.0	D15/04388848	Major review undertaken. AMP recast to reflect asbestos policy (D15/0378326).
2 December 2019	20 November 2019	3.0	D19/0436414	Major review undertaken including a review of roles and responsibilities for key staff at schools and workplaces, and the increased number of staff required to undertake mandatory training
19 February 2023		4.0		Minor review incorporating asbestos in soils and asbestos dust and debris in roof spaces and changes to the WHS Act 2020 and Regulation 2022

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1 Introduction

1.1 Overview

This Asbestos Management Plan (AMP) describes the Department of Education's (the Department) processes for ensuring all asbestos containing materials (ACM) are managed safely in schools and Department sites. It explains the roles of principals or site managers, managers corporate services, Department of Finance (DoF) and the Department.

The AMP is to be read in conjunction with the site-specific Asbestos Register that details the location and condition of asbestos containing material (ACM). Each site is to have an Asbestos Management File located in its reception building. The AMP and Asbestos Register are to be maintained in the Asbestos Management File.

The health, safety and wellbeing of students and staff are the Department's highest priority and we are committed to managing any asbestos containing materials found in schools and any other department facilities in such a way as to minimise any risk to students, staff, service providers, volunteers, parents and other visitors to the site.

In meeting this commitment, we recognise our obligation to comply with *section 274 of the Work Health and Safety Act 2020 (the WHS Act) and the Work Health and Safety Regulations 2022 (the WHS Regulation)*. We acknowledge that we must identify and manage the presence of all ACM in built infrastructure in accordance with the Safe Work Australia *Code of Practice for How to Manage and Control of Asbestos in the Workplace [July 2022]* and *Code of Practice for the Safe Removal of Asbestos [NOHSC:2002 (2005)]*. We also recognise our obligation to manage the presence of ACM in soils in accordance with the Department of Health's *Guidelines for the Assessment, Remediation and Management of Asbestos-Contaminated Sites in Western Australia*.

Appendix A lists some of the significant Australian Commonwealth and State acts, regulations, codes of practice and industry standards relevant to managing ACM in workplaces.

1.2 What is asbestos?

Asbestos is the common term used to describe any fibrous form of mineral silicates belonging to the Serpentine and Amphibole groups of rock forming minerals. These include actinolite, amosite (brown asbestos), anthophyllite, chrysotile (white asbestos), crocidolite (blue asbestos) and tremolite, and any mixture of one or more of these mineral silicates.

Asbestos was used extensively by Australian industry because of its durability, fire resistance and excellent thermal insulating properties. It was used in a wide range of products manufactured between the 1940s and 1980s as an additive often mixed into another base compound (such as cement) to enhance the physical properties of the material.

The use of all forms of asbestos has been banned throughout Australia since 31 December 2003. The national ban prohibits the manufacture, importation and use of all products containing any form of asbestos fibre or ACM regardless of actual quantities. The ban does not mean that all asbestos containing products installed before this date must be removed.

The ban acknowledges that ACM can be maintained in a safe manner, and it is only when these materials are being replaced or where they present health risks that non-asbestos alternatives must be used. Caution needs to be taken when working with buildings constructed prior to December 2003 and newer buildings where ACM may have been introduced by means of transportable buildings or various items imported to the site.

Appendix B describes the three main types of asbestos used as product additives.

1.3 What are asbestos containing materials?

The term ACM refers to materials, objects, products and debris that contain asbestos fibres. ACM can take several physical forms depending on its method of manufacture and application. The most common form is asbestos cement sheet which was manufactured in various profiles including flat, corrugated and profiled, and typically ranged from 10-15% asbestos content. Other forms of ACM include gaskets and seals, adhesives and mastics, vinyl sheeting and tiles, loose fill insulation, membranes, sprayed coatings and moulded products.

In the construction sector, ACM typically includes products such as roof sheeting, guttering and downpipes, fencing, exterior wall cladding including fascia and eaves, internal wall and ceiling panels, switchboard mounting panels, fire doors and fireproof coatings, and floor coverings such as sheet vinyl and vinyl tiles.

ACM also includes insulating materials containing asbestos fibres that were incorporated into plant and equipment such as air-conditioning heater-banks, lagging on steam and generator exhaust pipes, as well as linings and gaskets in some types of machinery.

While ACM are abundant in many schools and workplaces, their presence does not in itself constitute a risk as there must be some form of physical abrasion or chemical degradation of the materials in order to release asbestos fibres into the atmosphere. Studies show that, if ACM are in sound condition and left undisturbed, respirable asbestos fibres are not released and do not pose health risks.

Awareness, understanding and management of ACM are essential to ensure that students, staff and visitors to schools and workplaces are protected from possible exposure to respirable asbestos fibres.

Appendix C contains photos of the different types of ACM that can be found in some schools.

2 Definitions

ACM Register

Is a list of confirmed or presumed ACM that is present at the workplace and identified through visual inspection by a 'competent person', its location in the school or Department site, its condition, and the associated risk it presents to the welfare of workers (staff, volunteers, contractors and students).

Air monitoring

Is a process whereby air in and/or around an asbestos work area is monitored to detect the presence of respirable asbestos fibres. Air monitoring must comply with the guidance note on the *Membrane filter method for estimating airborne asbestos dust, 2nd edition [NOHSC: 3003(2005)]*; however, requirements vary depending on the types of ACM involved (e.g. friable or non-friable), the location of the asbestos work area and whether an enclosure is used.

Airborne asbestos fibre

Refers to any fibre of asbestos small enough to become airborne. For air monitoring, only respirable asbestos fibres are counted (see respirable asbestos fibre).

Asbestos Awareness Training

Refers to the training and information on ACM developed by the Department to ensure staff at schools and other sites have an understanding of asbestos in the workplace commensurate with their roles and responsibilities, including the location and purpose of the Asbestos Management File.

Asbestos containing material (ACM)

Any material, object, product or debris containing asbestos. Any product thought to contain asbestos fibres is also considered to be ACM until determined otherwise through testing or by a 'competent person'.

Asbestos Management File

The red file that contains the Asbestos Management Policy, Asbestos Management Plan, ACM Register, Maintenance logbook and any other documents and information pertaining to the management of ACM.

The Asbestos Management File must be kept in the reception or front office at each school or workplace.

Asbestos work area

When there is work being conducted that may impact on ACM an asbestos work area must be established. This is a specific area which includes enclosures or barriers and warning signs, that is set up to isolate the area while work is taking place. Access to this area is restricted to only those people carrying out the work.

For all Department schools and sites, the preference is for the whole site to be unoccupied while ACM work is being undertaken.

Only authorised personnel shall enter the asbestos work area while the asbestos related work is taking place and must not return to work until a Clearance Certificate has been provided.

Building Inspection Programs, Department of Finance (DoF)

The division of the Department of Finance that coordinates infrastructure development, maintenance and repair, and for all works related to the removal and/or remediation of ACM in schools and other Department sites. DoF also operates the Maintenance Service Centre.

Clearance certificate

Is a certificate issued by an independent licensed assessor or competent person to certify that a clearance inspection of an asbestos work area has been conducted and the area is safe to be occupied.

Clearance inspection

Is an inspection carried out in accordance with the *Work Health and Safety Regulations (2022)* and the *Code of Practice for the Safe Removal of Asbestos [NOHSC:2002 (2005)]* by a competent person to verify that an asbestos work area is safe to occupy after licensed work involving the disturbance, removal and/or remediation of ACM has taken place.

Code of Practice

Refers to the National Occupational Health and Safety Commission's *Code of Practice How to manage and control of asbestos in the workplace (2022)* or *Code of Practice How to safely remove asbestos (2022)*.

Competent person

Refers to a person possessing adequate qualifications (such as suitable training and sufficient knowledge, experience and skills) for the safe performance of the specific work.

Enclosed/encapsulated ACM

Refers to ACM that has been completely covered or sealed to prevent access to this material (ie: roof space, wall cavity, under floor covering).

Friable ACM

ACM which, when dry, are or may be crumbled, pulverised or reduced to powder by hand pressure. Any work to remove or remediate friable ACM must be accompanied by air monitoring for the duration of the works.

Maintenance logbook

The Maintenance logbook is provided by DoF for recording breakdowns, faults and other work requirements reported either by a school to DoF's Maintenance Service Centre or to record other works when the school or site directly engages contractors to undertake works they are funding. The logbook also serves as a certification record for workers attending the school or site that they have considered the presence of ACM.

Person Conducting Business or Undertaking (PCBU)

A PCBU refers to the legal entity running the business of undertaking and includes incorporated entities, sole traders, partners of a partnership and certain officers of an unincorporated association. It also includes the Commonwealth and its Departments, local governments and other government businesses and undertakings.

Respirable asbestos fibre

Refers to any fibre of asbestos small enough to penetrate the gas exchange regions of the lungs. Technically, it is defined as a fibre less than 3µm (0.0003mm) wide and between 5µm (0.0005mm) and 200µm (0.02mm) long with a length to width ratio of more than three to one.

Risk

Refers to the likelihood of a hazard causing harm to a person (see Appendix D: risk matrix). In terms of managing ACM, 'risk' relates to illness or disease arising from exposure to airborne asbestos fibres.

Health and Safety Representative (HSR)

An employee in the workplace elected under Part IV Division 1 of the *Work Health and Safety Act 2020* and Part 2.1 Division 2 of the *Work Health and Safety Regulations 2022* to represent the occupational safety and health interests of other employees in that workplace.

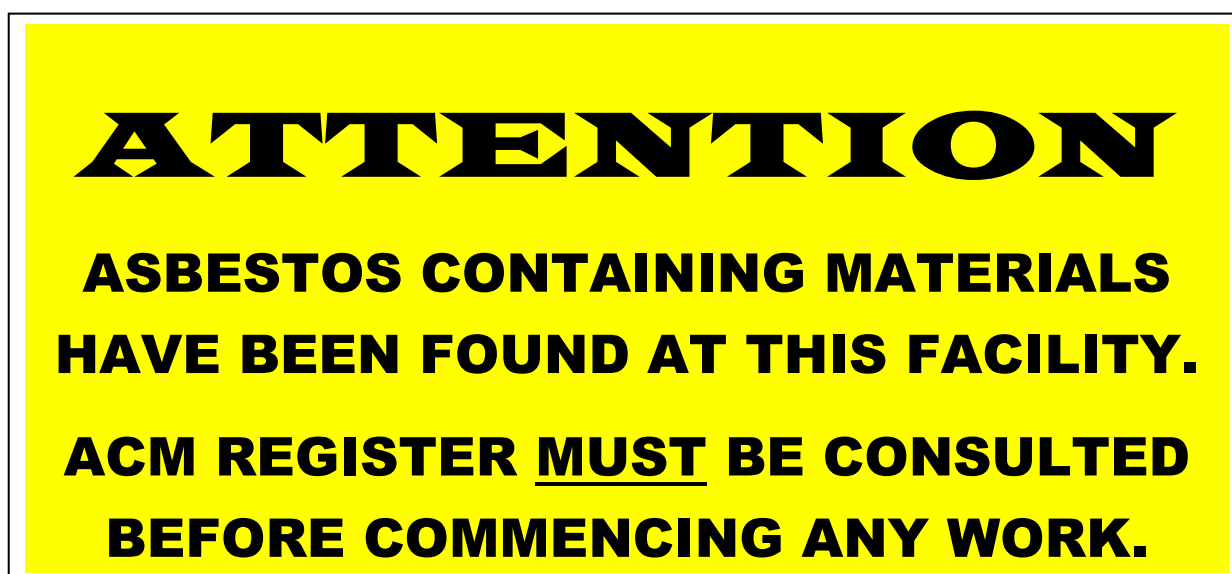
Workplace

Refers to a Western Australian public school or other Department controlled site, building or structure where employees work or are likely to be in the course of their work.

3 Asbestos management in schools

In compliance with the Work Health and Safety (General) Regulation 2022, Regulation 424 all Department workplaces must identify the presence and location of asbestos or ACM through our registers and by label.

Department workplaces are supplied with a label that provides a general warning that ACM may exist at the school or site and advising that the ACM Register must be consulted before commencing any work.



This label must be placed in a highly visible position at the entry to the reception or main office.

In doing so our Department workplaces are able to, so far as is reasonably practicable, ensure that the workplace is without risk.

ACM in a school will be left where they are, provided they do not present an unacceptable risk and are functional in terms of their designated purpose. The Department has an ongoing asbestos remediation program involving the planned removal of high risk ACM elements from schools. Where ACM are no longer functional or present as an unacceptable risk, they will be removed or replaced with suitable alternative products. If a product is presumed to contain asbestos, it will be treated as such until it is determined otherwise.

Each school has an ACM Register which identifies the location and condition of all confirmed and presumed ACM throughout the premises. The ACM Register must be located at the reception or main office in the Asbestos Management File and must be available at all times for review by all contractors, trades people and any other people proposing to undertake any repairs, modifications and maintenance before commencing any work on the premises. This includes any Department staff undertaking any work, such as hanging pictures or painting walls.

The Maintenance logbook is located in the Asbestos Management File and provides a certification record for workers attending the site that they have considered the presence of ACM and, if present, have undertaken appropriate work practices in accordance with the Code of Practice.

3.1 Asbestos Dust and Debris in Roof/Ceiling Spaces

Schools that previously had asbestos roofs are presumed to have asbestos dust and debris in the roof/ceiling space.

Access to the roof/ceiling space is controlled and work should only be undertaken by DOF or Department ICT contractors.

Specific warning labels are used to identify restricted access to areas considered to be possibly contaminated, such as the roof space in any building that has had ACM roof sheeting replaced.



This label is located at ceiling hatches, plumbing ducts, utility cupboards and exterior access points.

If undisturbed, staff, students and other building occupants have a low potential of exposure to any settled asbestos dust and debris that may remain in roof/ceiling spaces.

3.2 Asbestos in Soils

Historically, across WA, it has been common practice to demolish buildings containing asbestos without appropriate asbestos removal practices. Prior land use and historical practices in the use and disposal of ACM has resulted in some sites needing to manage legacy issues like buried ACM in soils.

Soils may contain ACM from a variety of sources, including:

- Asbestos fragments in proximity to ACM structures, including ACM fence fragments and fence stubs, within surface soils;
- Buried historical construction and demolition material or remnant surface fragments left within the demolition footprint;
- Fragments of an unknown source in subsurface or surface soils;
- Fly tipping (illegal dumping);
- Stockpiles of unknown composition; and
- Obsolete underground asbestos cement pipes and electrical service pits.

Asbestos in soil poses a negligible health risk to site users when left undisturbed. To manage and limit the risks, where asbestos has been identified in soil, soil intrusive activities are not to be undertaken in the affected areas without the implementation of appropriate controls under the management of the Department's Environmental Services and DoF.

Asbestos can occur on the soil surface as readily identifiable ACM fragments, or in the subsoil, usually identified during construction/maintenance works.

If you suspect ACM has been identified in soils;

- do not disturb the material and cease any activities in the area,
- cordon off or secure the area, and
- contact the Department's Environmental Services at environmentalservices.health@education.wa.edu.au.

Encountered fragments will be removed in line with Department of Health Guidelines, and further assessment may be warranted.

4 Asbestos Management File

The Asbestos Management File contains the Department's Asbestos Management Policy, Asbestos Management Plan, ACM Register, Maintenance logbook, DoF Asbestos Booklet and other relevant information associated with the management of ACM.

This file must be kept at the reception or front office of each Department workplace, and be available at all times for review by anyone proposing to undertake work of any nature on the buildings and/or associated infrastructure.

This file is to be used to keep additional records such as:

1. test results and clearance certificates, of any asbestos related works;
2. asbestos containing materials awareness fact sheet;
3. asbestos in soils management plan;
4. asbestos dust and debris in roof space fact sheet/management plan.

5 ACM Register

The location of all confirmed and presumed ACM are recorded in an ACM Register located at each school or workplace to allow for the easy identification of areas containing or presumed of containing ACM.

Each ACM Register contains the following information:

- name of the building, block and classroom
- building element containing the ACM
- location/description of the ACM
- estimated quantity of the ACM in square metres
- condition of the ACM (i.e. good, fair, poor – painted, cracked, broken)
- a risk rating from one to nine with nine being the lowest or least risk
- comments to assist those who may interact or undertake maintenance with the product.

The ACM Register should be read in conjunction with the school's site map, which identifies the location of buildings and rooms on each site. The most current version of the ACM Register, site map and risk matrix must be kept in the Asbestos Management File.

Specialist knowledge of ACM and building materials are not needed to understand or interpret the ACM Register. All materials confirmed or presumed to contain asbestos should be included in the ACM Register. If there is any doubt, the material should be presumed to contain asbestos and the school's DoF Program Manager or Department's Environmental Services should be contacted for advice and further clarification.

The Department ensures each of its sites has a current ACM Register that has been revised by a competent person at intervals of no more than 3 years. It is amended by DoF to ensure it reflects testing results and ACM related works as required.

The register must always be accessible to:

- all workers (staff, contractors, trades people or their PCBU) intending to carrying out work;
- health and safety representative.

The ACM Register must be read prior to conducting any work in a Department workplace.

6 Role of the principal/site manager

As the person with management responsibilities of the workplace, the principal/site manager is responsible for compliance with the Asbestos Management Plan. This includes ensuring the Asbestos Management File is always available at the main reception or front office, and that all staff at the workplace have asbestos awareness training commensurate with their roles and responsibilities.

The principal/site manager is also responsible for the general monitoring of the condition of ACM. However, this responsibility is limited to the reasonable expectation that a principal/site manager has the capacity to determine through visual observation that the ACM are intact and serviceable. They are not expected to have the technical knowledge to assess the physical condition of ACM in terms of its integrity.

Other staff, particularly cleaners and gardeners, are often the first to discover vandal and storm damage, breakdowns, faults, and safety and health issues, especially over school vacation periods and before the principal and manager corporate services arrive each day. The principal is responsible to ensure that they are aware of the processes relating to ACM and are appropriately trained to deal with these situations. Where damage to ACM or ACM in soil is detected, they must be reported to the principal or manager corporate services as soon as possible.

During vacation periods it's reasonable for the cleaner in charge or the gardener to be given the responsibility by the principal/site manager to report any maintenance issues or ACM related faults. The incident is logged as a Priority One fault through the DoF Maintenance Service Centre as an asbestos related fault and recorded in the Maintenance logbook.

ACM in soil should be reported to the Department's Environmental Services in the first instance and not the DoF Maintenance Service Centre.

If ACM is suspected to be involved, the area must be cordoned off and made secure and a preliminary assessment of the damage or extent of soil contamination must be made, by the principal/site manager if possible, to determine the level of risk. Suspected ACM is to be treated as ACM. Under no circumstances must the damaged ACM be further disturbed or removed by Department staff.

The following summary is a guide and should not be used in isolation from the main body of this Plan.

Role of the principal/site manager includes:

- ensuring that the deputy principal, manager corporate services, cleaner in charge, senior gardener/gardener and site health and safety representative complete the on-line Asbestos Awareness Training;

- ensuring that at induction and the commencement of each school year, all staff are provided with Asbestos Awareness Factsheet and made aware of the Asbestos Management File, ACM Register and process for reporting ACM damage;
- ensuring the Asbestos Management File containing the ACM Register and Maintenance logbook is available at all times for review by any contractors, tradesperson and other people proposing to undertake repairs, modifications and maintenance on the site;
- informing contractors and tradespersons of the need to review the ACM Register to identify the nature and extent of any ACM known to be in the work area;
- ensuring that any ACM related works are undertaken by DoF appointed contractors;
- schools with restricted roof/void spaces are required to notify and communicate the potential hazard to workers;
- schools with restricted roof/void spaces are required to ensure contractors receive a copy of the asbestos dust and debris roof void management plan;
- ensuring DoF is notified of the hazard when works is planned
- reporting breakages and maintenance involving ACM as a Priority One fault to the DoF Maintenance Service Centre;
- reporting damage to ACM through the Online Incident Notification System where damage is substantial such as extensive vandalism and fire damage, or it is likely to become a community issue;
- in response to an unplanned incident involving ACM, including ACM in soil, confirming the area is cordoned off and excluded from general use until the area is made safe;
- reporting any potential exposure of staff and students to asbestos fibres through the Online Incident Notification System;
- ensuring that anyone (staff, visitors, volunteers or students) who believes they have been exposed to airborne asbestos fibres are referred to the Department's health and safety consultants for advice on being added to the Department's asbestos exposure register and the National asbestos register;
- advising the school health and safety representative and staff of any incident that creates a risk of exposure to airborne asbestos fibres;
- discuss remedial action with DoF Program Manager and the Department, and in consultation with the site health and safety representative where the potential risk has been verified;
- informing all staff of any works that involve the remediation or removal of ACM before commencement;
- disseminating information on the consultation process to all staff, P&C association and school council/board, in accordance with agreed consultation procedures; and
- update and/or replace information in the ACM Register when new information is issued by the Department or DoF.

7 Role of the manager corporate services

The manager corporate services play a key role in the management of the front office and those that are engaged to undertake works on the school's buildings. The manager corporate services must ensure they are familiar with the ACM Register and understand where ACM has been identified across the site. Managers corporate services are encouraged to walk the site while referring to the ACM Register, as this will assist with understanding the location of the ACM.

Under the delegation of the principal and as the line manager for front office staff, cleaners and gardeners, the manager corporate services is responsible for ensuring:

- staff in roles identified in this Plan have completed the required on-line Asbestos Awareness Training;
- a copy of the most recent ACM Register is located in the cleaner and gardener store rooms;
- these staff understand their roles and responsibilities in respect to the management of ACM and can respond appropriately in the event of an asbestos related incident.

With respect to front office staff, this also includes ensuring that:

- the Asbestos Management File is always available at the main reception or front office;
- the Asbestos Awareness Sticker is in place and the ACM Register is current;
- all contractors and tradesperson review the ACM Register to identify the nature and extent of any ACM known to be in the work area;
- any ACM related works are undertaken by DoF appointed contractors; and
- breakages and maintenance involving ACM are reported as a Priority One fault to the DoF Maintenance Service Centre.

Along with the principal/site manager, the manager corporate services is also responsible for the general monitoring of the condition of ACM. However, this responsibility is limited to the reasonable expectation that a manager corporate services has the capacity to determine through visual observation that the ACM are intact and serviceable. They are not expected to have the technical knowledge to assess the physical condition of ACM in terms of its integrity.

8 Role of Department of Finance (DOF)

DoF, by agreement with the Department, is responsible for the coordination of the removal or remediation of all ACM in schools or Department controlled workplaces where it is considered the ACM present an unacceptable risk, or will be disturbed during building works.

As such, all asbestos related work must be arranged through DoF. DoF will also ensure there is a competent person to carry out any functions in relation to the evaluation, remediation or removal of any ACM.

DoF also coordinates the ACM audit process to update the ACM Register for each school and Department workplace. The process involves the inspection, visual assessment and recording of all confirmed or presumed ACM by a competent person engaged by DoF.

Role of DoF includes:

- liaising with the Department and principals in respect to ACM issues and concerns on an as needed basis;
- ensuring all DoF contractors who carry out work at schools or other Department owned workplaces are appropriately licensed for the work they are undertaking, and are aware of the requirements applicable to working with ACM;
- ensuring all ACM related work is carried out in accordance with all relevant legislative requirements, safe work practices, and the Asbestos Management Plan;
- facilitating clearance inspections and certificates where required or agreed through consultation, following the completion of asbestos related work;
- advising the Department if a contractor has not followed the appropriate work practices and has created an unacceptable risk; and
- coordinating the ACM audits and updating all ACM Registers.

9 Role of the Department of Education

The Department has over-arching responsibility for the management of ACM located in schools and other worksites controlled by the Department. This responsibility is exercised through the Director Infrastructure Operations, who is responsible for the development, periodic review and dissemination of the Asbestos Management Plan and principals/site managers who are responsible for compliance with the Asbestos Management Plan at their site.

Role of the Department includes:

- ensuring all premises have a copy of the Asbestos Policy, Asbestos Management Plan, ACM Register and Maintenance logbook;
- ensuring that all required staff complete the on-line Asbestos Awareness Training;
- ensuring all staff are appropriately trained in the general management of ACM in schools and workplaces, and are able to respond appropriately to an ACM incident;
- initiating the periodic ACM audits and providing each school and workplace known to have ACM with a current ACM Register;
- providing advice and support to principals/site managers on environmental health issues pertaining to asbestos in the workplace through the Department's Environmental Health Services; and
- providing advice and support to principals/site managers on workplace health safety issues through the Department's Health and Safety consultants.
- maintaining a register in the Employee Relations Directorate of staff, visitors, volunteers and students who believe they have been exposed to air borne asbestos fibres, in accordance with *State Records Act 2000*.

10 Asbestos management process

The following diagram provides an overview of the asbestos management process, outlines the different categories of work that may involve ACM, and the roles and levels of involvement by the relevant parties.

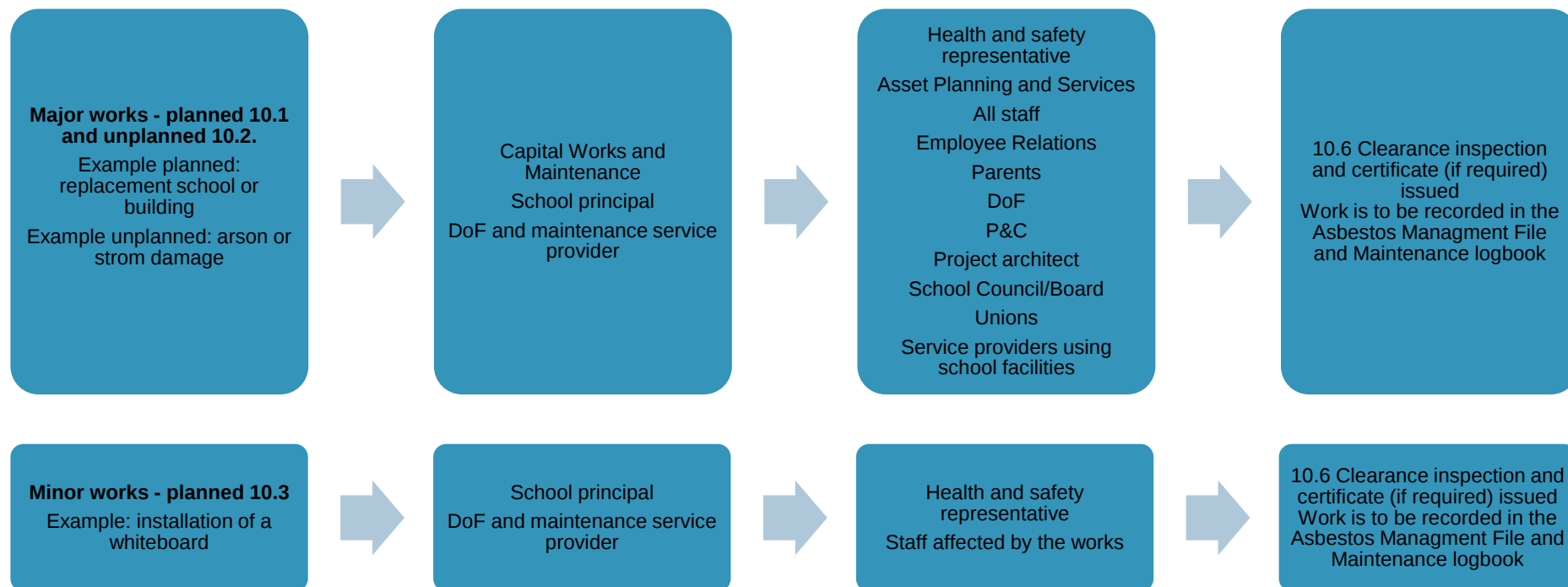
Asbestos management process

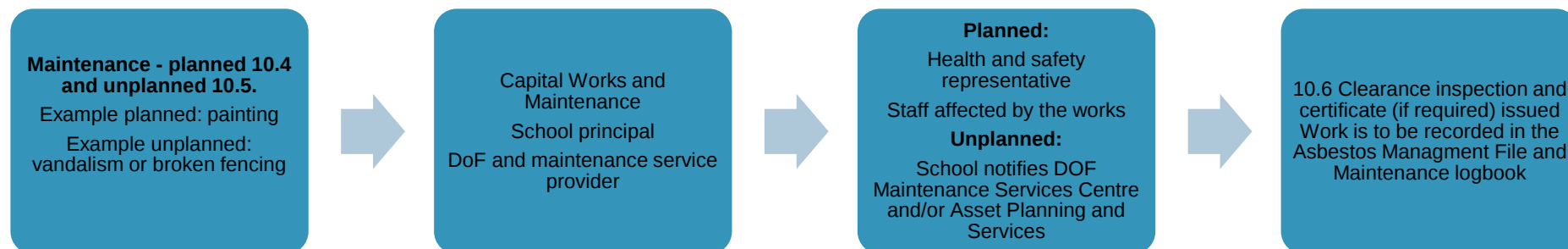
Work type

Who is involved?

Who is consulted?

Final step





10.1 Major works – planned

Work in this category includes new buildings, upgrades and major refurbishments, and most demolition work. These works are the responsibility of DoF, with liaison from project officers from the Department's Capital Works and Maintenance Directorate.

During preliminary scoping of the work, the DoF contract manager will determine if the project is likely to include asbestos related work. If so, a consultation meeting should be arranged by the Department's project officer as soon as practical. The meeting should be held at the school and depending on the scope and impact of asbestos related works a further consultation meeting may also be required at the asbestos work area.

NB: All asbestos likely to be disturbed by demolition/refurbishment must be identified and, as far as is reasonably practicable, be removed before demolition/refurbishment is started. (WHS (General) Regulations 2022, regulation 451 and 452)

The Department's project officer will arrange this meeting with the principal/site manager. The following people/parties should be advised of asbestos related works, and if appropriate invited to attend depending on the scope and impact that the work will have on the school's operations:

- health and safety representative (HSR)
- teachers and support staff
- gardening and cleaning staff
- P&C representative
- school council/board representative
- service providers utilising school facilities
- Employee Relations
- Infrastructure Operations
- DOF representative
- project architect
- State School Teachers' Union of WA
- Community and Public Sector Union
- United Voice Union
- Australian Workers Union

Apart from people carrying out this work, no one is permitted to remain in the asbestos work area while asbestos related work is in progress. In addition, for all Department schools and sites, the preference is for the whole site to be unoccupied while ACM work is being undertaken. The asbestos removalist must barricade the area and display signs alerting to the presence of asbestos.

NB: The Department has taken a conservative position in consultation with the Regulators (WorkSafe, DoH) and unions to protect all site users from possible exposure to potential Work Health and Safety risk. For all Department schools and sites, the preference is for the whole site to be unoccupied while ACM work is being undertaken.

Once the works are complete, a clearance inspection must take place by a competent person and a clearance certificate issued by the person who undertook the inspection before the work area is re-occupied. If required, a follow up meeting can be held to provide reassurance that the removal and/or remediation of any ACM disturbed in the course of the building works have been completed to the required standard and it is safe for students and staff to return.

Details of any ACM removal or remediation must be recorded in the Maintenance logbook once work has been completed and a clearance certificate issued, a copy should be kept in the Asbestos Management File.

10.2 Major works – unplanned

Work in this category usually results from fires, storms or extensive vandal damage. These works are the responsibility of DoF, with liaison from project officers from the Capital Works and Maintenance Directorate.

The initial response is to make the site or specific area affected safe and secure. An onsite meeting between DoF, the maintenance services provider, Government Insurance Division (formerly RiskCover), the principal and health and safety representative should take place as soon as possible to review the situation and to determine if any ACM have or will be affected during works to rectify the damage.

NB: All asbestos likely to be disturbed by demolition/refurbishment must be identified and, as far as is reasonably practicable, be removed before demolition/refurbishment is started. (WHS regulations 451)
Where it is determined ACM have or will be affected during the rectification works, a consultation meeting must be held at the school at the earliest opportunity. The purpose of this meeting is to consider what impact the works will have on the school's operations, how they can be managed to ensure the safety of staff and students as well as mitigate disruption to education delivery. If closing part or all of the school is considered necessary the principal must immediately consult with the Regional Executive Director and/or Deputy Director General, Schools.

The Department's project officer will arrange this meeting with the principal/site manager. The following people/parties should be advised of asbestos related works, and if appropriate invited to attend depending on the scope and impact that the work will have on the school's operations:

- health and safety representative
- teachers and support staff
- gardening and cleaning staff
- P&C representative

- school council/board representative
- service providers utilising school facilities
- Employee Relations Directorate
- Infrastructure Operations
- DOF representative
- project architect
- State School Teachers' Union of WA (SSTUWA)
- Community and Public Sector Union (CPSU/CSA)
- United Voice Union
- Australian Workers Union.

Apart from people carrying out this work, no one is permitted to remain in the asbestos work area while asbestos related work is in progress. In addition, for all Department schools and sites, the preference is for the whole site to be unoccupied while ACM work is being undertaken. The asbestos removalist must barricade the area and display signs alerting to the presence of asbestos.

Once the works are complete, a clearance inspection must take place by a competent person and a clearance certificate issued by the person who undertook the inspection before the work area is re-occupied. If required, a follow up meeting can be held to provide reassurance that the removal and/or remediation of any ACM disturbed in the course of the building works have been completed to the required standard and it is safe for students and staff to return.

Details of any ACM removal or remediation must be recorded in the Maintenance logbook once work has been completed and if a clearance certificate is issued, a copy should be kept in the Asbestos Management File.

10.3 Minor works – planned

Works in this category may include installing fixtures or making penetrations (e.g. for computer cables) in walls or ceiling and it is necessary to consider the potential for affecting any ACM.

Where work is initiated by the school, the ACM Register must be checked and if the work proposed involves ACM it must be referred to DoF so the work can be undertaken by a competent person. The works need to be recorded in the Maintenance logbook.

Where work is initiated by DoF, an email will be sent to the school by the maintenance services provider (metropolitan schools) or the DoF manager (country schools). The email will confirm the extent of any discussion or exchange of information and request endorsement of the proposed arrangements by a return email. Where issues cannot be resolved by telephone consultation, it may be necessary to arrange an onsite consultation meeting.

The principal or site manager must notify the health and safety representative and other staff that there is asbestos present, the extent of any asbestos related works and confirm the work will be undertaken outside of school hours. Depending on the nature and extent of the work, the principal may also need to consider whether parents need to be notified.

Details of any ACM removal or remediation must be recorded in the Maintenance logbook once work has been completed and if a clearance certificate is issued, a copy should be kept in the Asbestos Management File.

10.4 Maintenance – planned

There is the potential to affect ACM during planned and routine maintenance works that are carried out on a regular basis, such as gutter cleaning, tree pruning, painting and the replacement of floor coverings. The nature and extent of any ACM present must be considered before work commences to ensure that proper work practices will be utilised. This type of work also includes the remediation or removal of ACM that are risk rated at one or two during the periodic ACM audit.

The ACM Register must be checked beforehand and if the work involves ACM it must be undertaken by an appropriately trained person and in accordance with the appropriate work procedures. If any ACM are to be removed or remediated, they must be done by a licensed contractor outside school hours. Apart from people carrying out this work, no one is permitted to remain within the asbestos work area while asbestos related work is in progress.

DoF or the maintenance services provider will consult with the school and send an email to the principal detailing the proposed work arrangements. Agreement from the principal is required by return email. Where issues cannot be resolved over the telephone or via email, it may be necessary to arrange an onsite consultation meeting.

Details of any ACM removal or remediation must be recorded in the Maintenance logbook once work has been completed and if a clearance certificate is issued, a copy should be kept in the Asbestos Management File.

10.5 Maintenance – unplanned

These works result from sudden and unpredictable events, such as the failure of equipment, accidental damage by students and staff and damage to infrastructure caused by vandalism and storms. The area must be cordoned off and made secure and a preliminary assessment of the damage must be made if possible to determine if ACM are involved, this is done by referencing the ACM Register. If ACM are involved, they should be reported as an asbestos related fault to the Maintenance Services Centre and recorded in the Maintenance logbook.

The discovery of remnant ACM in soil also falls into this category and should be reported to the school's DoF Program Manager or the Department's Environmental Health Services. ACM in soil is not reported to the Maintenance Service Centre.

As a cleaner or gardener are often the first to spot and report any damage, especially during vacation periods, the principal must ensure they are aware of the processes relating to ACM and are appropriately trained to deal with these situations.

Depending on the amount of ACM involved and the nature and extent of the impacts, consultation between the principal and DoF should take place as soon as possible. This is to decide whether the Government Insurance Division should be advised and to determine what must be done to ensure the safety of staff and students as well as mitigate the impact it may have on the education program. The principal should consult the school or site health and safety representative and determine what other parties need to be consulted. The principal should also report this event through the Department's Online Incident Notification System.

If an after-hours call-out involves ACM, the aforementioned process may not be possible prior to work commencing. The contractor undertaking the repairs is required to ensure no one remains within the asbestos work area while work is in progress except for those carrying out the repairs. If it is discovered ACM are present, the appropriate protocols and work procedures must be followed.

Details of any ACM removal or remediation must be recorded in the Maintenance logbook once work has been completed and if a clearance certificate is issued, a copy must be kept in the Asbestos Management File.

10.6 Clearance Inspections

A clearance inspection must be carried out to verify that an asbestos work area is safe to reoccupy after licensed work involving the disturbance, removal and/or remediation of ACM has taken place. Any protective barrier between the asbestos work area and public areas should remain intact until completion of all asbestos removal work and successful completion of the clearance inspection.

Clearance inspections must be carried out by an independent competent person, for licensed asbestos work:

- A clearance inspection on works involving more than 10m² of non-friable asbestos can be carried out by a Class A or B licensed asbestos removalist.
- For all friable asbestos removal the independent competent person must be a licensed asbestos assessor who has not been involved in the removal of asbestos for that specific work.
- If the total amount of ACM is less than 10m² and non-friable it is not considered licensed works.

An inspection may also include air monitoring and/or settled dust sampling, and all barriers and warning signs must remain in place until the clearance certificate is issued. Where friable ACM are involved, air monitoring is mandatory.

A clearance certificate in writing is issued before the workplace can be re-occupied in accordance with the Code of Practice How to Safely Remove Asbestos 2022. If a clearance certificate has not been obtained, the asbestos removal area must not be re-occupied for normal use.

A copy of the clearance certificate must be placed in the Asbestos Management File.

10.7 WorkSafe

WorkSafe is part of the Department of Energy, Mines, Industry Regulation and Safety. It is the Western Australian Government agency responsible for the administration of the WHS Act. This includes the provision of inspectors and staff to secure compliance with the legislation.

Appendix A – relevant codes and legislation

Listed below are some of the key legislation, codes of practice and policies relevant to the management and control of ACM in schools and workplaces.

- National Strategic Plan for Asbestos Awareness and Management (NSP) 2019-2023;
- WA Department of Education, Asbestos Management Policy
- Work Health and Safety Act (2020);
- Work Health and Safety (General) Regulations 2022;
- Code of Practice How to Manage and Control of Asbestos in Workplace 2022;
- Code of Practice How to Safely Remove Asbestos 2022;
- WA Department of Education, Work Health and Safety Policy V 4, May 2022;
- WA Department of Education, Work Health and Safety Procedures V 4, May 2022;
- Contaminated Sites Act (2003);
- Code of Practice, Demolition Work
Guidelines for the Assessment, Remediation and Management of Asbestos-Contaminated Sites in Western Australia; and
- *State Records Act 2000 (section 4.2.3 Asbestos)*

Appendix B – the main types of asbestos

Chrysotile asbestos

White asbestos belonging to the serpentine group.

Characteristics:

- most flexible
- most heat resistant
- can be spun and woven
- most abundant form.



Amosite asbestos

Brown or grey asbestos belonging to the amphibole group.

Characteristics:

- harsh spiky fibres
- good tensile strength
- resistance to heat
- coarse nature.



Crocidolite asbestos

Blue asbestos belonging to the amphibole group.

Characteristics:

- straight, stiff needle-like fibres
- strongest
- high resistance to acids.



Appendix C – Examples of ACM in Department sites.

Corrugated asbestos cement roofing and ridge capping	
Corrugated asbestos cement roofing and ridge capping	
Asbestos cement ceilings	
Asbestos cement slotted eaves	

Asbestos cement fence	
Asbestos cement fence	
Asbestos cement sunshade louvres, fascia and wall panels	
Asbestos cement flues	

Asbestos cement cable pits (concrete lids)	
Asbestos cement cable pits (concrete lids)	
Vinyl floor tiles Some vinyl floor tiles contain asbestos fibres in the tile composition while others may have them in the backing. Not all vinyl tiles contain asbestos fibres and where they do, the amount can vary greatly.	
Vinyl floor tiles Some vinyl floor tiles contain asbestos fibres in the tile composition while others may have them in the backing. Not all vinyl tiles contain asbestos fibres and where they do, the amount can vary greatly.	

Appendix D – Risk Matrix

The ACM Register contains information of the description of the current condition of the ACM material and probability of the fibre-bond matrix becoming unstable, airborne and respirable.

The following matrix assists in interpreting the results of the risk assessment reported in this ACM Register.

CONDITION OF MATERIAL	GOOD	Risk Rating 9 Sealed, coating in good condition and /or Unweathered and surface sound and well bound. Low Probability of Disturbance.	Risk Rating 7 Sealed, coating good condition and /or Unweathered and surface sound and well bound. Medium Probability of Disturbance.	Risk Rating 4 Sealed and coating good condition and /or Unweathered and surface sound and well bound. High Probability of Disturbance.
	FAIR	Risk Rating 8 Unsealed or Coating deteriorated, Moderately weathered. Low Probability of Disturbance.	Risk Rating 5 Unsealed or Coating deteriorated, Moderately weathered. Medium Probability of Disturbance.	Risk Rating 2 Unsealed or Coating deteriorated, Moderately weathered. Friable. High Probability of Disturbance.
	POOR	Risk Rating 6 Unsealed or coating damaged, Severely weathered. Low Probability of Disturbance.	Risk Rating 3 Unsealed or coating damaged, Severely weathered; or Friable. Medium Probability of Disturbance.	Risk Rating 1 Unsealed or coating damaged, Severely weathered; or Friable. High Probability of Disturbance.
		LOW	MEDIUM	HIGH
	PROBABILITY OF DISTURBANCE (During Normal Operational Use)			

Is this deleted material covered elsewhere e.g. Ikon or the policy?

Same comment as the previous Appendix – is the deleted content covered elsewhere?