

AUDIT OF DET ASBESTOS MANAGEMENT IN QUEENSLAND SCHOOLS

Conducted By

GASKIN CONSTRUCTION SERVICES PTY LTD

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INTRODUCTION

The Queensland Government's policy for the management and control of asbestos containing materials in government buildings is one of proactive commitment to safe and healthy work environment and practices.

It is Department of Education and Training policy that any asbestos material classified as being in poor condition by the Department of Public Works (DPW) is immediately made safe and programmed for removal. It should be noted that asbestos containing material (ACM) does not present a health risk if left undisturbed.

The department has clear and concise procedures in place to address the management of asbestos related matters in schools. These procedures are in line with the Queensland Workplace Health and Safety Act 1995 and the Queensland Government's Asbestos Management and Control Policy for Government Buildings.

SCOPE OF WORKS / EXPECTATIONS

This report is an independent and objective review and audit of the systems and procedures put in place by the Department of Education and Training (DET) and the Queensland Government to monitor and ensure the ongoing safety of asbestos containing materials (ACM) in Queensland State Schools.

As part of the review the report will advise on DET's compliance with Queensland Government Asbestos Management and Control Policy for Government Buildings and legislative requirements including the Workplace Health and Safety Act.

The report is to assess DET's approach to asbestos management and monitoring ensuring that efficient and safe outcomes for Queensland State Schools are being achieved through the existing processes, procedures and delivery strategies.

The report will make recommendations on any other aspect in relation to the management of asbestos in State Schools as necessary to ensure the ongoing safe and efficient management of ACM.

METHODOLOGY

This report has been prepared after extensive research and interviews.

- Face to face interviews with the Department of Works Principal Project Officer, Built Environment Research Unit.
- Queensland Government literature and policy research on asbestos in schools and government buildings.
- School Principals and support staff.
- Associations representing State School Principals
- Queensland Catholic Education Commission
- Queensland Council of Parents and Citizens Association
- Queensland Secondary Principals Association
- Independent Schools Queensland
- Senior executives in the Department of Education and Training
- Senior executives in the Department of Public Works
- A senior executive of QBuild
- Senior executives of Workplace Health and Safety Queensland
- Asbestos removal contractors and consultants

Reference Documents

- Workplace Health and Safety Act 1995
- Workplace Health and Safety Regulation 2008
- National Occupational Health and Safety Commission
"Code of Practice for the Management and Control of Asbestos in Workplaces"
"Code of Practice for the Safe Removal of Asbestos"
- Workplace Health and Safety publications and fact sheets

OVERVIEW OF GOVERNMENT'S POSITION

In July 2006, Executive Government approved the Asbestos Management and Control Policy for Government Buildings.

This policy is a commitment to ensuring that asbestos containing material (ACM) in government controlled buildings is managed and controlled to protect the health and well-being of workers, contractors and the community.

The long term objective is for all government controlled buildings to be free of ACM. Until this is achieved, a risk management-based strategy will be implemented to safeguard people who occupy, service and visit these buildings. The policy is consistent with, and supports, the legal requirements in relation to the management, control and removal of ACM.

The policy is implemented using a strategy that involves the following key steps:

- Identification and recording of all ACM
- Assessment of the risks posed by the identified ACM
- Management of in situ ACM based on its assessed level of risk
- Removal of ACM based on its assessed level of risk
- Development and maintenance of effective consultation frameworks and awareness training programs.

Queensland's workplace health and safety legislation (administered by the Department of Justice and Attorney General) provides a framework for the regulation of asbestos-related risk in work environments. In respect to asbestos hazards, the Queensland Workplace Health and Safety Act 1995 establish mandatory requirements through the:

- Workplace Health and Safety Regulation 1997
- National Code of Practice for the Management and Control of Asbestos in Workplaces (known as the 'asbestos management code')
- National Code of Practice for the Safe Removal of Asbestos – 2nd Edition (known as the 'asbestos removal code').

MANAGEMENT OF ASBESTOS PRODUCTS IN SCHOOLS

FCM-PR-003

This document outlines the responsibilities shared between the Department of Education and Training, Principals, Regional Facilities Managers, Regional Executive Managers and the Department of Public Works (QBuild) in the management of asbestos products in schools.

An overview of this document has been prepared and summarises the key issues in this report.

A table setting out the parties responsible for managing the actions in the plan highlights the key role played by the Principal in ensuring the protocols and documents to be issued before any facilities maintenance or construction is undertaken at the school. It is the responsibility of the Executive Director to induct any acting or new Principal. This induction is important to the effective operation of the management of asbestos in schools and regular training updates are recommended.

The forms for Work Area Access Permits, Principal Checklist, Incident Management Report and Guidelines for written communication to parents when actioned provide the Principal with the documentation to ensure that controls required and necessary are in place.

The reference in the documentation to the Built Environment Materials Information Register (BEMIR) ensures that this electronic record of Asbestos Containing Materials is continually updated and can be used to help manage items of ACM by giving them a ranking.

The BEMIR contains materials updated every time the maintenance or inspections or work on asbestos is carried out. The presence and general location of asbestos in school buildings is identified in the BEMIR. Procedures to identify the location and presence of asbestos containing materials must be actioned before any physical works are carried out.

QBuild undertakes an assessment of the condition of state school facilities on an annual basis. Where the assessment of the condition of the ACM requires repairs or replacement, this will be carried out using approved procedures.

A comprehensive asbestos inspection, including a review of the Asbestos Register for each school, is also conducted every three years in line with policy for the management of asbestos in government owned buildings. Annual maintenance condition inspections of ACM are carried out and any observations are entered into the BEMIR.

The program for management of asbestos containing vinyl flooring maintenance inspections and repairs and/or replacement is ongoing and upon validation by QBuild, schools identified for replacement are being tendered and costs met from the 2009/2010 program budget.

In November 2009 an investigation by the Department of Public Works in conjunction with QBuild and Parsons Brinkerhoff undertook sample testing to determine the composition of suspected asbestos containing material to identify a particular type of sheeting known as low density board.

This investigation was undertaken to identify and record the frequency of the presence of low density board and the results of these inspections will be the subject of a report to be presented to the Department of Education and Training. The observations will also be included in the BEMIR for ongoing reference.

A procedure for the maintenance and management of work where the location of ACM including LBD is confirmed or suspected has been developed.

This procedure has been developed by the Department of Education and Training with reference to Work Place Health and Safety Queensland.

All of these procedures comply with the Workplace Health and Safety Act, Code of Practice for the Management and Control of Asbestos in Workplace and other relevant documentation.

Other relevant documents:

- School Asbestos Related Activity – information for all staff.
- Asbestos and Associated Risks in Schools – Definitions
- Flow Chart for Managing Asbestos Incidents

Please refer to Appendix B for Form FCM-PR-003 Management of Asbestos Products in Schools.

ROLES AND RESPONSIBILITIES

Responsibilities

Principals

Principals have the first line of responsibility and cannot delegate accountability of any asbestos related issues.

- Principals are to be aware of any contractors employed on a day to day basis who undertake building or maintenance related works of any description.
- Principal is responsible for the authorisation and closure of Work Area Access Permits.

The Principal is to:

- Brief staff in relation to management of asbestos products.
- Ensure staff understand they do not re-engage any contractors for work without explicit approval of the Principal.
- Follow Principal Checklist overseeing maintenance work.

Activities involving product suspected of containing asbestos being distributed or discovered.

Principals are to:

- Stop any work that caused the potential disturbance / discovery
- Immediately remove staff or students present or in vicinity
- Close off and isolate the affected area from traffic of any kind and inform all staff (including cleaners) of the restrictions
- Contact the Regional Facilities Manager immediately to advise of situation. If unsuccessful in reaching Facilities Manager, immediately call QBuild
- Contact Local Health and Safety Consultant
- Refers any media enquiries to Corporate Communications and Marketing Branch
- Ensure that the correct procedures are followed in relation to overseeing the maintenance work using the Principal Checklist
- Principals are to authorise a Work Area Access Permit for issue to the person undertaking the works

- Oversee corrective action and / or any testing (arranged through QBuild) that is to occur. Note: QBuild, or its contractors, are the only organisation to conduct this work

Where corrective action is required, Principals are to:

- Oversee corrective action (clean up) taken by professionals (QBuild)
- Ensure staff or students are not permitted to clean up areas
- Communicate results of any testing to Regional Facilities Manager, positive or negative, as soon as they are received
- Undertake event investigation and write investigation report identifying corrective actions
- Ensure event investigation outcomes are documented
- Keep all staff informed including cleaners

When communicating with Parents/Guardians, Principals are to:

- Prepare letter / communication to be sent to parents / guardians within 24 hours, where test results are positive, advising them of what has occurred, what actions have been taken and the results of testing
- Use Guidelines for Written Communications with Parents, which contains sample letters to parents advising of class relocation and advising of test results
- Send the draft letter / communication to the Regional Executive Director for approval before it is sent to parents

When reporting details, Principals are to:

- Complete an Incident Management Report in BEMIR and send it to the Regional Facilities Manager by Close of Business of the Monday of the week following the asbestos related matter at the school. This information is used to reconcile with weekly reports provided by QBuild, Department of Public Works
- Send an Incident Management Report by the due time, irrespective of whether all corrective and other action is completed. It could be that for one event, reporting more than once may be necessary to finalise the matter
- Enter details into the SMS Workplace Health and Safety Module as a dangerous event as described in Flow Chart for Managing Asbestos Incidents

- | |
|---|
| <ul style="list-style-type: none"> ▪ Principals have substantial responsibility to manage, oversee, monitor, control and report on all areas of asbestos management. |
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Regional Directors

Act with Executive Director (schools) to generally oversee that the Principals' performance and reporting responsibilities are carried out in accordance with Asbestos Management in Schools Policies

Assistant Director-General, Office of Education Queensland

Responsibility for overseeing the performance and reporting responsibilities of the Principal, Regional Facilities Manager and Regional Executive Director are carried out in accordance with Asbestos Management in Schools Policies.

- The Principals have substantial responsibility to manage, oversee, monitor, control and report on all areas of asbestos management in the government owned building for which they are responsible. Principals provide guidance, direction and instructions to the staff responsible to them and communicate asbestos related issues up to the Regional Managers through to the Assistant Director General, Office of Education Queensland and other operatives in the management of asbestos products in schools.

QBuild, Department of Public Works, or their contractors

Before any maintenance or construction work is undertaken in schools, QBuild or its contractors are to:

- Provide 24 hours notice
- Obtain a Work Area Access Permit from the Principal
- Advise the Principal of test results after testing occurs as a part of "routine" maintenance or work issues
- Close out Work Area Access Permit with the Principal
- Acknowledge BEMIR and the asbestos register may not be exhaustive and take all necessary precautions following the procedures documented in Policy and Procedures FCM-PR-003

- The Principal has the substantial responsibility to manage and control QBuild or its contractors when they are carrying out any work at the school. In cooperation with QBuild or the contractor the execution and close out of Work Area Access Permits and the sighting and signing of the asbestos register is the Principal's area of responsibility. Failure by QBuild or the contractor to comply and meet these requirements can result in a breach which, subject to the severity, may be referred to the Division of Workplace Health and Safety.

Please refer to Appendix A for the Action and Responsibilities Spreadsheet.

OUTCOMES OF REVIEW

Currently Policy and Procedure FMC-PR-003 Management of Asbestos Products in Schools is being updated. The amendments contained in the draft version have been reviewed. Some procedures have been updated but they mainly relate to departmental division responsibilities including change of position descriptions. This report has reviewed the current FMC-PR-003.

DET's policies, processes and guidelines are compliant with Queensland Government Asbestos Management and Control Policy for government buildings and the Workplace Health and Safety Act and meet the intent of these documents.

DET's approach to asbestos management and monitoring of Queensland state schools provides the necessary controls and disciplines to meet DET's stated objectives.

Principal

The Principal has the first line of responsibility and cannot delegate accountability for management of any asbestos related issues. Therefore, ongoing training needs to be provided for Principals, Deputy Principals, School Administrators, Facilities Management staff and Groundsmen on the management of asbestos in schools. This training does not need to be of a technical nature but focus on the management and controls in the day to day operations of the schools including new construction, refurbishment or maintenance works that are proposed and where asbestos is registered on the BEMIR.

Part of the training should include the requirement to provide proper briefings to subordinate staff that may be required to provide assistance in management of the ACM environment. Regular reviews and updates should be included as part of this initiative.

As the Principal is responsible for the total operations of the school environment, it is recommended that the responsibilities for the management, control and compliance of asbestos related issues, including notices, access permits and updating of the BEMIR become the responsibility of the Business Service Manager (BSM) or other approved nominee, with the Principal's responsibility retained as the senior executive responsible for overall performance.

Contractors to undertake day to day work in schools

An area of risk which needs to be addressed is the contractors and others who may be employed to carry out normal maintenance work in schools, or do so on a voluntary basis, as asbestos issues could arise through these activities.

The current list includes:

- QBuild
- QBuild employed contractors
- Central office employed contractors
- Contractors employed directly by the school or the school's Janitor/Groundsman
- Contractors employed by P&C Association members
- P&C Association arranged contractors
- Volunteers

A partnership agreement between DET and DPW (QBuild) for the Management of Maintenance Services is currently a draft document and is being finalised for signing in 2010. This document not only addresses the financial and performance arrangements between the parties but also sets out the contractual arrangements between DET and QBuild or any contractors QBuild employ to undertake the works. This agreement will ensure that all the necessary controls are in place for work carried out in schools and how asbestos containing materials will be managed.

This agreement will also include the reporting on the BEMIR for work carried out by QBuild and/or its contractors where Q Build has been notified by the relevant authorised DET personnel that other parties have undertaken the work.

With regards to the other contractors categories including volunteers, there is no requirement for the reviewing of a contractor's compliance with BSA licensing or asbestos management qualifications in the Work Area Access Permits or the Principal Checklist or associated documents.

It is recommended that a requirement to provide compliance details needs to be part of the procurement process and should be highlighted on the Work Area Access Permits and other relevant documentation.

The monitoring and management by the Principal of P&C Association appointed contractors should be subject to the same conditions as referred to in this report.

It is recommended that a more rigorous system for the management and control of volunteers should be considered. Volunteers will need to be subject to the same compliant requirements as contractors although it is unlikely there will be a commercial contract in place.

Volunteers play an important supporting role in schools assisting in voluntary work activities which are generally minor in nature but contribute to the function and operation of the school's infrastructure.

It is not intended to place unnecessary restrictions on volunteers making their valuable contribution to the schools. However, to ensure potential asbestos issues are managed, volunteers who cannot meet the requirements for licensing and compliance will have their scope of work restricted to non construction/refurbishment activities to such matters as loose furniture installation and provision of free standing items etc. This should be defined when a Work Area Access Permit is issued.

Incident Management Plan

It is recommended that an Incident Management Plan for schools be prepared by the Department of Education and Training, or their consultants. This document is to provide the Principal and senior staff, QBuild and other parties with guidance as to what actions are to be taken when an incident occurs in the school precinct.

These incidents are not limited to, but include:

- Buildings damaged or destroyed by fires and/or natural disasters
- Buried asbestos including management of its removal when it is exposed
- Low density asbestos fibreboard

Management of these incidents are currently covered by various documents issued by the Office of Fair Trading, Safe Work Queensland, Workplace Health and Safety Queensland, Department of Public Works/QBuild and various other State and Federal agencies.

This document would provide the guidelines as to how incidents are to be managed so that all personnel and departments involved in their management will have uniform guidelines. Development of the proposed guidelines should be managed by DET with close involvement from other government departments including DPW/QBuild, Queensland Fire and Rescue, Office of Fair Trading, Safe Work Queensland and Workplace Health and Safety.

The Incident Management Plan will assist in providing guidelines which can be used with the implementation of standard DET procedures set out in FCM-PR-033 Management of Asbestos Products in Schools.

RECOMMENDATIONS

1. Ongoing training needs to be provided for Principals, Deputy Principals, School Administrators, Facilities Management staff and Groundsmen on the management of asbestos in schools. This training does not need to be of a technical nature but focus on the management and controls in the day to day operations of the schools including new construction, refurbishment or maintenance works that are proposed and where asbestos is registered on the BEMIR.
2. Training should include the requirement to provide proper briefings to subordinate staff that may be required to provide assistance in management of the ACM environment. Regular reviews and updates should be included as part of this initiative.
3. It is recommended that the responsibilities for the management, control and compliance of asbestos related issues, including notices, access permits and updating of the BEMIR become the responsibility of the Business Service Manager (BSM) or other approved nominee, with the Principal's responsibility retained as the senior executive responsible for overall performance.
4. Q Build will updated the BEMIR for work carried out by QBuild and/or its contractors or where Q Build has been notified by the relevant authorised DET personnel that other parties have undertaken the work.
5. It is recommended that a requirement to provide compliance and licence details needs to be part of the procurement process and should be highlighted on the Work Area Access Permits and other relevant documentation.
6. The monitoring and management by the Principal of P&C Association appointed contractors should be subject to the same conditions as other contractors referred to in this report.

7. It is recommended that a more rigorous system for the management and control of volunteers should be considered. Where it is proposed that volunteers carry out work in areas where ACM including LBD is confirmed or suspected they will need to be subject to the same compliant requirements as contractors.
8. It is recommended that an Incident Management Plan for schools be prepared by the Department of Education and Training, or their consultants.

ACTIONS AND RESPONSIBILITIES

Queensland School - Asbestos Management

Actions and Responsibilities

Item	Action Item	Responsibility
Before any maintenance or construction work is undertaken at school		
	Ensure the Executive Director (Schools) inducts any acting or new Principals	Regional Executive Directors / Assistant Director-General, Office of Education Queensland
	Ensure all Principals are using the Built Environment Materials Information Register and that is readily available for discussion with contractors	Regional Executive Directors / Assistant Director-General, Office of Education Queensland
	Ensure all Principals understand they are responsible for the Built Environment Materials Information Register being updated to current status at all times	Regional Executive Directors
	Discuss accountabilities in this area with Principals	Assistant Director-General, Office of Education Queensland
	Discuss accountabilities in this area with Principals	Regional Executive Directors
	Ensure that Executive Director (Schools) works with Principals to ensure that all procedures are in place and that they fully understand what needs to occur when work is to be undertaken	Regional Executive Directors
	Ensure all Principals understand they are responsible for authorising and closing Work Area Access Permits to initiate updating of Built Environment Materials Information Register (BEMIR) by QBuild	Assistant Director-General, Office of Education Queensland
	Ensure Regional Executive Directors and Executive Director (Schools) work with Principals to ensure that all procedures are in place and they fully understand what needs to occur if work is to be undertaken	Assistant Director-General, Office of Education Queensland
	Provide a minimum 24 hour notice period to commencement of any planned or service maintenance work to be undertaken at a school	QBuild
	Obtain and sign a Work Area Access Permit including details of the asbestos register, from the Principal acknowledging they will be potentially working with asbestos products and ensuring appropriate work practices are in place	QBuild
	Advise the Principal beforehand and provide results after an event where testing occurs as a part of 'routine' maintenance or work issues (as opposed to an incident)	QBuild
	Ensure that Principal, who is responsible for closing the Work Area Access Permit is informed of changes when signing off the Work Area Access Permit at completion of the works (there is a section in the form for a contractor to complete detailing changes to asbestos)	QBuild
	Acknowledge that the Built Environment Materials Information Register and the asbestos register are not exhaustive and that the contractor makes his / her own assessment whether the work to be undertaken may involve asbestos containing materials	QBuild
	Take all necessary precautions whether the Built Environment Materials Information Register exists or not	QBuild

For activities involving product suspected of containing asbestos being disturbed or discovered:		
	Stop any work that caused the potential disturbance / discovery	Principal
	Immediately remove staff or students present or in vicinity	Principal
	Close off and isolate the affected area from traffic of any kind and inform all staff (including cleaners) of the restrictions	Principal
	Contact the Regional Facilities Manager immediately to advise of situation. If unsuccessful in reaching Facilities Manager, immediately call QBuild	Principal
	Contact Local Health and Safety Consultant	Principal
	Refers any media enquiries to Corporate Communications and Marketing Branch	Principal
	Ensure that the correct procedures are followed in relation to overseeing the maintenance work using the Principal Checklist	Principal
	Principals are to authorise a Work Area Access Permit for issue to the person undertaking the works	Principal
	Oversee corrective action and or any testing (arranged through QBuild) that is to occur. Note: Q Build is only entity authorised to conduct this work	Principal
	Establish Flow of Communication	Regional Executive Directors / Assistant Director-General, Office of Education Queensland
	Flow of Communication - Principal to contact Regional Facilities Manager	Principal
	Flow of Communication - Contact Regional Executive Director	Regional Facility Manager
	Flow of Communication - Contact QBuild to active corrective action	Regional Facility Manager
	Flow of Communication - Contact Facilities Services Branch to advise of details of event and action being taken	Regional Facility Manager
	Advise school on testing procedures and organise testing (if necessary) through Q Build	Regional Facility Manager
	Ensure that the Regional Facilities manager advises the school on testing procedures and organise testing (if necessary) through Q Build	Regional Executive Directors / Assistant Director-General, Office of Education Queensland
	Manages coordination of advise to the Office of Education Queensland and Facilities Services Branch in central office	Regional Executive Directors / Assistant Director-General, Office of Education Queensland
	Advise and support schools where requested including inspecting and advising on appropriate course of action	QBuild
	Advise and support schools where requested including securing the site on approval from the Department of Education and Training	QBuild
	Advise and support schools where requested including arranging for samples of dust, debris or materials to be taken and tested	QBuild
	Advise and support schools where requested including arranging specialist technical advise as required	QBuild
	Provide results of dust, debris or materials testing to the school Principal and the Regional Facilities Manager with recommendations on what action is required	QBuild
	Arrange and supervise approved remediation works which could include decontamination and / or rectification work	QBuild

Where corrective action is required		
	Oversee corrective action (clean up) taken by professionals (QBuild)	Principal
	Ensure staff or students are not permitted to clean up areas	Principal
	Communication results of any testing to Regional Facilities Manager positive or negative as soon as they are received	Principal
	Undertake event investigation and write investigation report identifying corrective actions	Principal
	Ensure event investigation outcomes are documented	Principal
	Keep all staff informed including cleaners	Principal
	Assist Principal in corrective action through QBuild	Regional Facilities Manger
	Ensure the Regional Facilities Manager assists the school in overseeing corrective action through QBuild	Regional Executive Directors / Assistant Director-General, Office of Education Queensland
	Ensure QBuild respond in a timely manner to requests for testing and clean up	Regional Executive Directors / Assistant Director-General, Office of Education Queensland
	Arrange through QBuild for specialist hazardous management contractors to clean the are if the test is positive for asbestos	Regional Executive Directors / Assistant Director-General, Office of Education Queensland
	Refer results of testing to the school principal	Regional Executive Director
	Ensure all corrective action has been taken	Regional Facilities Manager
	Confirm with the Regional Facilities Manager that all corrective action has been taken	Regional Executive Director
	Ensure copies of technical reports are provided to schools immediately they are available	Regional Executive Director
	Confirm to schools and Facilities Services Branch that clearance has been granted by Q Build to reoccupy affected areas	Regional Executive Director
	Brief Facilities Services Branch on the scope and cost estimates to address asbestos related issues	Regional Executive Director
	Ensure asbestos removal and cleaning are carried out outside school hours unless Facilities Services Branch have approved otherwise and have advised specifics (Note: This would be confirmed in the Work Area Access Permit	Regional Executive Director / Q Build
	Not conduct any asbestos related work in the presence or vicinity of staff or students, whether within classrooms / buildings or externally and whether asbestos products are present or not	QBuild
	Establish and maintain exclusion zones and other reasonable conditions imposed by the Work Area Access Permit (during removal or remediation works)	QBuild
	Consider student and staff safety by ensuring works are carried out in accordance with Workplace Health and Safety Regulations	QBuild
	Report to the Principal immediately in the event of discovering or suspecting the existence of asbestos products, while performing works that do not appear in the Built Environment Materials Information Register	QBuild
	Ensure appropriate work practices are in place, including a work method statement, and that work is carried out in accordance with relevant conditions set down in the Workplace Health and Safety Act 1995 and Regulations and Advisory Standards and	QBuild
	Ensure that appropriate and thorough clean up of site occurs	QBuild

When communicating with Parents / Guardians		
	Prepare letter / communication to be sent to parents / guardians within 24 hours, where test results are positive, advising them of what has occurred, what actions have been taken and the results of testing	Principal
	Use Guidelines for Written Communications with Parents, which contains sample letters to parents advising of class relocation and advising of test results	Principal
	Send the draft letter / communication to the Regional Executive Director for approval before it is sent to parents	Principal
	Work with Principal on the contents of an appropriate letter / communication to parents	Regional Executive Director
	Give verification of content of the letter / communication to parents in respect to reported results and corrective action	Regional Facilities Manager
	Seek the Regional Facilities Manager's verification of content of the letter / communication to parents in respect to reported results and corrective action	Regional Executive Director
	Review the draft letter / communication and, where this draft letter / communication is reporting a positive result, forward it to ADG EQ for approval	Regional Executive Director
	Ensure that the communication is sent to parents within 24 hours of a positive result	Regional Executive Director
When reporting details		
	Complete an Incident Management Report in BEMIR and send it to the Regional Facilities Manager by Close of Business of the Monday of the week following the asbestos related matter at the school. This information is used to reconcile with weekly reports provided by QBuild, Department of Public Works	Principal
	Send an Incident Management Report by the due time, irrespective of whether all corrective and other action is completed. It would be that for one event, reporting more than once may be necessary to finalise the matter	Principal
	Enter details into the SMS Workplace Health and Safety Module as a dangerous event as described in Flow Chart for Managing Asbestos Incidents	Principal
	Reconcile any Incident Management Reports detailing asbestos related activities from the previous week	Regional Facilities Manager
	Ensure the Regional Facilities Manager reconciles any Incident Management Reports detailing asbestos related activities from the previous week and send it to the Office of Education Qld by close of business the following Tuesday	Regional Executive Director
	Report weekly to the ADG (Shared Services) Department of Education and Training, outlining arranged sampling and testing of suspected asbestos containing materials and air monitoring completed in state schools	QBuild
	Provide a report to the Department of Education and Training by the following Wednesday	QBuild
	Meet monthly with ADG (Shared Service) and DDG Education to work through the report asbestos testing and corrective action in schools	QBuild
	Arrange updates of the Central Asbestos Register as part of organised asbestos inspection removal and testing activities	QBuild
	Take all follow up action agreed between Q Build and Department of Education and Training on a state-wide basis	QBuild

	Understand that should contractors fail to initiate appropriate safe work practices or do not follow instructions of a Principal in relation to sighting and signing the Work Area Access Permit and Asbestos Register, or work within vicinity of staff or students, their performance will be reviewed and could lead to further action, depending on severity of breach, including referral of the issue to the Division of Workplace Health and Safety for a major incident	QBuild
	Initiate appropriate action against contractors who fail to comply with Workplace Health and Safety legislation. This could range from Q Build conducted performance Review for a minor incident to a discontinuation of services and / or referral to the Division of Workplace Health and Safety for a major incident	QBuild

FCM-PR-003

Management of Asbestos Products in Schools



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FCM-PR-003: Management of Asbestos Products in Schools

Outlines responsibilities shared between Principals, Regional Facilities Managers, Regional Executive Directors, Facilities Services Branch, Office of Education Queensland and the Department of Public Works (QBuild) in management of asbestos products in schools.

Relevant legislation and policy

Legislation and/or regulations

- [Workplace Health and Safety Act 1995](#)  (new window)  Part 3
<http://www.legislation.qld.gov.au/LEGISLTN/CURRENT/W/WorkplHSA95.pdf>

Substantive policy

- [Asbestos Advisory Standard 0032004 - Queensland](#) 
<http://www.dir.qld.gov.au/workplace/subjects/asbestos/law/index.htm>
- [Hazardous Substances Advisory Standard 2003 - Queensland](#) 
<http://www.dir.qld.gov.au/workplace/law/codes/hazardoussubstances/>
- [Asbestos Management and Control Policy for Government Buildings](#)  (new window) 
<http://www.build.qld.gov.au/amps/AmpsDocs/Asbestos-policy-full.pdf>
- [Code of Practice for Management and Control of Asbestos in Workplaces April 2005 - National Occupational Health and Safety Commission](#) 
<http://www.nohsc.gov.au/PDF/temp/ManagementCode.pdf>

Related procedures

- [HLS-PR-016: Workplace Health and Safety Consultative Framework](#)
</strategic/eppr/health/hlspr016/>

Statement of intent

Asbestos is a common product used extensively in buildings, including houses, hospitals and schools, built prior to 1990.

The Department of Public Works, as the Queensland Government's asbestos management authority, undertook a comprehensive audit regime of all public buildings, including state schools, which was completed by the mid - 1990's. Asbestos materials (e.g. loose asbestos material such as insulation) identified as part of those audits, were removed at that time. Asbestos roof, ceiling and wall sheeting, guttering and downpipes and floor tiles remain in schools and do not present a health risk if left undisturbed.

Schools identified as having asbestos were provided with a site-specific Building Management Plan (BMP) containing five sections, including the Audit Report and Register (Asbestos Register), which indicates the location and condition of known asbestos products at the school at the time the Plan was created. Schools followed the Building Management Plan to ensure student and staff safety. All rectification work was identified in the school's Maintenance Assessment Reports.

The Department has now moved from the paper-based Building Management Plan (BMP) to

the Built Environment Materials Information Register (BEMIR). BEMIR is an electronic environmental management system designed to assist government agencies with the management of environmentally significant matters within Government controlled facilities.

The permit process previously contained in the BMP is replaced in BEMIR by:

- A Work Area Access Permit (WAAP) - permit produced through BEMIR for all maintenance and/or construction work.

The departmental FAX-back proforma for reporting the management of asbestos related matters is now replaced in BEMIR by:

- The Incident Management Report (IMR) - informs of the management of any significant environmental matters including asbestos related matters and can be distributed electronically.



QBuild undertakes an assessment of the condition of state school facilities on an annual basis. This includes an inspection of all building components known or suspected of containing asbestos. Where required, repairs or replacements are carried out using appropriate work procedures.

A comprehensive asbestos inspection, including a review of the asbestos register for each school, is also conducted every three years in line with policy for the management of asbestos in government-owned buildings.


Emergent incidents involving asbestos products will be immediately addressed to make the area safe. The Department of Education and Training will remove asbestos product immediately from schools should it deteriorate and represent a potential health risk. Emergent issues will be addressed immediately to ensure on-going student and staff well-being.

Responsibilities

Principals:



- cannot delegate accountabilities for management of any asbestos related issues
- are to be aware of any contractors employed on a day-to-day basis who are to undertake building or maintenance-related works of any description. These include QBuild or QBuild employed contractors, central office employed contractors, contractors employed directly by a school, and others such as the school's JG or Parents and Citizens Association members or P & C arranged contractors.
- are to ensure that they, and relevant school staff, have access to the Built Environment Materials Information Register;
- are responsible for the authorisation of the Work Area Access Permits;
- are to ensure the closure of [Work Area Access Permits](#) (new window) 614k  in BEMIR which notifies QBuild of the work undertaken and enables them to update the AREG if required; and
- should advise employee's experiencing health problems to seek medical treatment following process outlined in [Flowchart for Events involving Asbestos in Schools](#) (new window) .

Before any maintenance work or construction is undertaken at school:

- brief staff, particularly cleaners, in relation to management of asbestos products in school using [School Asbestos Related Activity - Information for All School Staff](#) (new window) .
- ensure staff understand they do not engage any contractors for work, however minor, without explicit approval of Principal
- follow [Principal Checklist](#) (new window) 26k  in relation to overseeing maintenance work.

For activities involving product suspected of containing asbestos being disturbed or discovered, Principals are to:

- stop any work that caused potential problem
- immediately remove staff or students present or in vicinity;
- close off and isolate the affected area from traffic of any kind and inform all staff (including cleaners) of the restrictions;
- contact Regional Facilities Manager immediately to advise of situation. If unsuccessful in

- reaching Facilities Manager, immediately call QBuild
- contact local Health and Safety Consultant
- ensure that the correct procedures are followed in relation to overseeing the maintenance work using the [Principal Checklist \(new window\)](#) ;
- are to authorise a [Work Area Access Permit \(new window\)](#) 614k  for issue to the person undertaking the work
- oversee corrective action and/or any testing (arranged through QBuild) that are to occur. Note: QBuild is only company/organisation to conduct this work.
- refers any media enquiries to Corporate Communications and Marketing Branch.

Work Area Access Permits generated in BEMIR will include an asbestos register for the improvement in which the work is to be undertaken. It will also enable any special conditions to be specified, such as undertaking the work outside of school hours.




Where corrective action is required, Principals are to:

- oversees corrective action (clean-up) taken by professionals (i.e. QBuild)
- ensures staff or students are not permitted to clean up areas
- communicate results of any testing to Regional Facilities Manager whether positive or negative as soon as they are received
- undertake event investigation and write investigation report identifying corrective actions
- ensure event investigation outcomes are documented
- keep all staff informed including cleaners

When communicating with Parents/Guardians, Principals are to:

- prepare letter/communication to be sent to parents/guardians within 24 hours, where test results are positive, advising them of what has occurred, what actions have been taken and the results of testing;
- use [Guidelines for Written Communication with Parents](#), which contains sample letters to parents advising of class relocation and advising of test results; and
- send the draft letter/communication to the Regional Executive Director for approval, before it is sent to parents.

When reporting details, Principals are to:

- complete an [Incident Management Report \(new window\)](#) 47k  in BEMIR and send it to the Regional Facilities Manager by close of business of the Monday of the week following the asbestos related matter at the school. This information is used to reconcile with weekly reports provided by QBuild, Department of Public Works;
- send an [Incident Management Report \(new window\)](#) 47k  by the due time, irrespective of whether all corrective and other action is completed. It could be that for one event, reporting more than once may be necessary to finalise the matter; and
- enter details into the SMS Workplace Health and Safety Module as a dangerous event, as described in [Flow Chart for Managing Asbestos Incidents \(new window\)](#) .

Regional Executive Directors:

Before any maintenance or construction work is undertaken at school Regional Executive Directors are to:

- ensure that Executive Directors (Schools) inducts any acting or new Principal;
- ensure all Principals are using the Built Environment Materials Information Register and that it is readily available for discussion with contractors;
- ensure all Principals understand they are responsible for the Built Environment Materials Information Register being updated to current status at all times;
- discuss accountabilities in this area with Principals; and
- ensure that Executive Directors (Schools) work with Principals to ensure that all procedures are in place and that they fully understand what needs to occur, if work is to be undertaken.

Where an activity occurs involving product suspected of containing asbestos being disturbed or discovered, Regional Executive Directors are to:

- establish processes whereby:
 - Principal immediately contacts the Regional Facilities Manager;
 - the Regional Facilities Manager immediately contacts the Regional Executive Director;
 - the Regional Facilities Manager immediately calls QBuild to activate corrective action;

- and
- o the Regional Facilities Manager calls Facilities Services Branch to advise of details of event and action being taken.
- ensure that the Regional Facilities Manager advises the school on testing procedures and organises testing (if necessary) through QBuild; and
- manages co-ordination of advice to the Office of Education Queensland and Facilities Services Branch in central office.

Where corrective action is required, the Regional Executive Director is to:

- ensure the Regional Facilities Manager assists the school in overseeing corrective action through QBuild;
- ensure QBuild responds in a timely manner to requests for testing and clean up;
- arrange through QBuild for specialist hazardous management contractors to clean the area if the test is positive for asbestos;
- refer results of testing to the school principal;
- confirm with the Regional Facilities Manager that all corrective action has been taken;
- ensure copies of technical reports are provided to schools immediately they are available;
- confirm to schools and Facilities Services Branch that clearance has been granted by QBuild to re-occupy affected areas;
- brief Facilities Services Branch on the scope and cost estimates to address asbestos related issues; and
- ensure that any recommendations from the QBuild Report have been implemented.

Communication with Parents, where test results are positive, Regional Executive Directors are to:

- work with the Principal on the contents of an appropriate letter / communication to parents;
- seek the Regional Facilities Manager's verification of content of the letter/communication, with respect to reported results and corrective action;
- review the draft letter/communication and, where this draft letter/communication is reporting a positive result, forward it to the ADG EQ for approval; and
- ensure that the communication is sent to parents within 24 hours of a positive result.

When reporting details, the Regional Executive Director is to:

- ensure the Regional Facilities Manager reconciles any Incident Management Reports detailing asbestos related activities from the previous week and send it to the Office of Education Queensland by close of business on the following Tuesday.

Assistant Director-General, Office of Education Queensland:

Before any maintenance or construction work is undertaken at school, the Assistant Director-General Education Queensland is to:

- ensure Executive Directors (Schools) induct any acting or new Principal;
- ensure all Principals are using Built Environment Materials Information Register (BEMIR) and that they ensure that information is readily available for discussion with contractors;
- ensure all Principals understand they are responsible for authorising and closing Work Area Access Permits to initiate updating of Built Environment Materials Information Register (BEMIR) by QBuild;
- discuss accountabilities in this area with Regional Executive Directors; and
- ensure that Regional Executive Directors and Executive Directors (Schools) work with Principals to ensure that all procedures are in place and that they fully understand what needs to occur if work is to be undertaken.

Where an activity occurs involving product suspected of containing asbestos being disturbed or discovered, the Assistant Director-General Education Queensland is to:

- establish processes whereby:
 - o Principals immediately contact the Regional Facilities Manager;
 - o the Regional Facilities Manager immediately contacts the Regional Executive Director;
 - o the Regional Facilities Manager immediately calls QBuild to activate corrective action;
- and
- o the Regional Facilities Manager calls Facilities Services Branch to advise details of the event and what corrective action is being taken.
- ensure that the Regional Facilities Manager advises the school on testing procedures and organises testing (if necessary) through QBuild; and
- manage the co-ordination of advice to the Office of Education Queensland and Facilities Services Branch in Central Office.

Where corrective action is taken, the Assistant Director-General Education Queensland is to:

- ensure that the Regional Facilities Manager assists the school in overseeing corrective action through QBuild;
- ensure QBuild responds in timely manner to requests for testing and clean up;
- arrange through QBuild, for specialist hazardous management contractors to clean area if test is positive for asbestos;
- refer results of testing to the school Principal;
- confirm with the Regional Facilities Manager that all corrective action has been taken;
- ensure copies of technical reports are provided to schools immediately they are available;
- confirm to schools and Facilities Services Branch that clearance has been granted by QBuild to re-occupy affected areas;
- brief Facilities Services Branch on the scope and cost estimates to address asbestos related issues; and
- ensure that any recommendations from the QBuild Report have been implemented.

When communicating with Parents where test results are positive, the Assistant Director General Education Queensland is to:


- work with Regional Executive Director on the contents of and appropriate letter/communication to parents ensuring communication is sent to parents within 24 hours of a positive result;
- approve the letter/newsletter; and
- seek the Regional Facilities Manager's verification of the content of letter / communication with respect to reported results and corrective action, through the Regional Executive Director.

When reporting details the Assistant Director General Education Queensland is to:

- ensure that the Regional Facilities Manager reconciles any Incident Management Reports from schools detailing asbestos related activities from the previous week and sends it to the Office of Education Queensland by close of business following Tuesday.

QBuild, Department of Public Works, or their contractors:



Before any maintenance or construction work is undertaken in schools QBuild or its contractors are to:

- provide a minimum 24 hours notice prior to commencement of any planned or service maintenance work to be undertaken at a school;
- obtain and sign a Work Area Access Permit, including details of the asbestos register, from the Principal acknowledging they will be potentially working with asbestos products and ensuring appropriate work practices are in place;
- advise the Principal beforehand and provide results after an event where testing occurs as a part of 'routine' maintenance or work issues (as opposed to an 'incident');
- ensure that the Principal, who is responsible for closing the [Work Area Access Permit \(new window\)](#) , is informed of changes when signing off the Work Area Access Permit at completion of the work (there is a section in the form for a contractor to complete detailing changes to asbestos);
- acknowledge that the Built Environment Materials Information Register and the asbestos register, are not exhaustive and that the contractor makes his/her own assessment whether the work to be undertaken may involve asbestos containing materials; and
- take necessary precautions whether the Built Environment Materials Information Register exists or not.

Where an activity occurs involving product suspected of containing asbestos being disturbed or discovered, QBuild or its contractors are to:

- advise and support schools, where requested, including:
 - inspecting and advising on appropriate course of action;
 - securing the site on approval from the Department of Education and Training;
 - arranging for samples of dust, debris or materials to be taken and tested; and
 - arranging specialist technical advice, as required.
- provide results of dust, debris or materials testing to the school Principal and the Regional Facilities Manager, with recommendations on what action is required; and
- arrange and supervise approved remediation works which could include decontamination and/or rectification work.




Where corrective action is required, QBuild or its contractors are to:

- ensure asbestos removal and cleaning are carried out outside school hours unless Facilities Services Branch have approved otherwise and have advised specifics. (Note: This would be confirmed in the [Work Area Access Permit](#) (new window) ;
- not conduct any asbestos related work in the presence or vicinity of staff or students, whether within classrooms/buildings or externally, and whether asbestos products are present or not;
- establish and maintain exclusion zones and other reasonable conditions imposed by the [Work Area Access Permit](#) (new window)  (during removal or remediation works);
- consider student and staff safety by ensuring works are carried out in accordance with Workplace Health and Safety Regulations;
- report to the Principal immediately in the event of discovering or suspecting the existence of asbestos products, while performing works that do not appear in the Built Environment Materials Information Register;
- ensure appropriate work practices are in place, including a work method statement, and that work is carried out in accordance with relevant conditions set down in the Workplace Health and Safety Act 1995 and Regulations and Advisory Standards; and
- ensure that appropriate and thorough clean up of site occurs.

When reporting details, QBuild or its contractors are to:

- report weekly to the ADG (Shared Services) Department of Education and Training, outlining arranged sampling and testing of suspected asbestos containing materials and air monitoring completed in state schools;
- provide a report to the Department of Education and Training by the following Wednesday;
- meet monthly with ADG (Shared Services) and DDG Education to work through the report of asbestos testing and corrective action in schools;
- arrange updates of the Central Asbestos Register as part of organised asbestos inspection, removal and testing activities;
- take all follow up action agreed between QBuild and Department of Education and Training on a state-wide basis;
- understand that, should contractors fail to initiate appropriate safe work practices or do not follow instructions of a Principal in relation to sighting and signing the Work Area Access Permit and Asbestos Register, or work within vicinity of staff or students, their performance will be reviewed and could lead to further action, depending on severity of breach, including referral of the issue to the Division of Workplace Health and Safety for a major incident; and
- initiate appropriate action against contractors who fail to comply with workplace health and safety legislation. This could range from a QBuild conducted performance review for a minor incident to discontinuation of services and/or referral to the Division of Workplace Health and Safety for a major incident.

Forms

- [Principal Checklist](#) (new window) 26k 
- [Work Area Access Permit](#) (new window) 614k 
- [Incident Management Report](#) (new window) 48k 
- [Guidelines For Written Communication to Parents \(includes sample letters advising of class re-location and test results\)](#)

Guidelines

Not Applicable

Other relevant documents

- [School Asbestos Related Activity - Information for all School Staff](#) (new window) 37k 
/strategic/epr/facility/fcmpr003/attach1.pdf
- [Asbestos and Associated Risks in Schools - Definitions](#)/strategic/epr/facility/fcmpr003/definitions.html
- [Flowchart for Managing Asbestos Incidents](#) (new window) 19k 
/strategic/epr/facility/fcmpr003/attach7.pdf

RESPONSE TO DET QUERIES

- The use of stickers to identify ACM on all presumed or confirmed ACM items

Under the Code of Practice for the Management and Control of Asbestos in the Workplace 9.5.1 Warning Signs states that workplace areas which contain ACM “should be signposted” with these signs placed at all of the main entrances to the work areas where asbestos is present.

9.5.2 Labels states that all identified or presumed ACM “should be clearly labelled. It also states that “a competent person should determine the number and position of the labels required” and that the location of labels should be consistent with the location of ACM as outlined by information in the register of ACM (BEMIR).

The DPW asbestos management guidelines with regard to Asbestos Warning Signage and Labelling provides a detailed guidance for the provision of warning signage and labelling of asbestos containing material.

- The issuing of Work Area Access Permits for all maintenance and refurbishment works

The issuing of Work Access Permits is adequately addressed under FCM-PR-003: Management of Asbestos Products in Schools. The Asbestos Management Guidelines for Work Area Access Permits clearly establish the protocols and requirements and the Principal is responsible for authorising and closure of work area permits.

- The risks to personnel where buildings identified as containing ACM have been destroyed by fires or natural disasters.

The risks can be contained by following the requirements as set out in FCM-PR-003

- *Issue of Work Area Access Permits.*
- *Secure area of damage with appropriate protective barriers.*
- *If practical areas where asbestos has been damaged are kept damp and contain water runoff, including monitoring and testing of water discharge*
- *Employ the services of an appropriately licensed builder and/or demolition contractor to undertake demolition and removal of ACM within the Queensland Government guidelines, including the Code of Practice for Safe Removal of Asbestos.*
- *Engage the services of an appropriately qualified consultant to undertake air monitoring tests and provide a clearance that the site is safe.*

- Role Clarification for technical advice and management of affected sites between DPW and DET

The draft Partnership Agreement 27/10/2009 makes reference to roles and responsibilities as well as the provision of technical advice.

It is recommended that the provision of technical advice by DPW/QBuild be scoped in the agreement to ensure that DET's requirements are met.

- DET's policy regarding "no-one on site whilst asbestos removal occurs"

Asbestos removal carried out in schools operational environment can be safely carried out by tight controls being maintained as detailed in the Code of Practice for the Safe Removal of Asbestos. Each planned asbestos removal will be assessed and its particular circumstance will need to be addressed in the project specific asbestos removal control plan.

The management of information to the school staff should be addressed in School Asbestos Related Activity and if considered appropriate, a communication with parents within the DET guidelines.

The most difficult part to manage will be the emotional reaction to the asbestos removal being undertaken in such an environment and the media's assessment of removal carried out under these conditions.

- DET's process for prioritising removal of ACM items

The BEMIR scope provides a numerical ranking of Asbestos Containing Materials identified in the BEMIR database.

Priority should be placed on category 76 to 100 where the ACM needs attention. Hazardous and special precautions are required if the ACM is disturbed.

- Low density asbestos fibreboard.

The recent Workplace Health and Safety notice PN10005 Version 2 dated November 2009 classified low density asbestos fibreboard as containing up to 70% (by volume) asbestos fibres (friable).

The Department of Public Works has prepared a report on this product.

This report will provide guidelines for the management and removal of friable asbestos.

PARTNERSHIP AGREEMENT