



**Department for  
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Dear Mr Andrews

### ASBESTOS SUBMISSION

Thank you for the sight of the above.

I must admit, like you, we would not be very keen on the idea of surveying all the schools. The cost of survey and removal and reinstatement would be prohibitive and probably much higher than the estimates in your report. As far as the schools and Local Education Authorities are concerned this would be a 'new burden', as such we would look for an appropriate PES transfer increase in funding to meet the cost of this 'new burden'. It may be helpful to bring out this point in the submission.

We also feel that it would not be fair to single out schools for such surveys thus implying that they are more at risk. Many schools as your report says contain asbestos but because of both HSE's and DfEE's clear and consistent guidance over many years most of the worst cases have been dealt with. Most LEAs have been carrying out surveys for years and some like ex-ILEA surveyed all their schools. Re-surveying all these buildings would put into question LEAs' work in this area, which in many cases has been carried out very competently.

While schools do contain asbestos, if it is sound and intact, it is not necessarily the children or the teachers who are at risk. Most at risk are contractors staff working on boilers, roofs etc.

If we go down the survey route, I suggest that they cover the following situation in schools:

- i. Before demolition of any part of the school building
- ii. Before undertaking major refurbishment of the school or a large part of it
- iii. Before undertaking work on elements likely to contain asbestos ie. roofs, boiler houses, pipe ducts etc.

We would suggest rewording paragraph 9, in the submission, along the following lines:

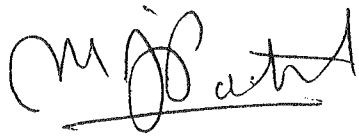
.....Asbestos in sound condition typically gives rise to exposure levels one thousandth of worker control limits, however, in a disturbed state the exposure level may approach or even exceed worker control limits. Use of Asbestos in public buildings is wide spread. Many schools, particularly those built in 50s,60s and early 70s, contain asbestos. Many local authorities, following DfEE and HSE guidance have carried out

surveys in their schools and dealt with the worst cases. Little would be achieved by giving high priority to schools or re-surveying schools where there is little or no danger. The cost of surveying all schools is estimated at £200 million plus £55 pa running cost. Such surveys and remedial work would also be highly disruptive to schools and may create its own hazards -----

The estimate of the survey above is higher than in your submission because I feel that if we are going to do the survey at all then we should do the full extensive survey, where for example, false ceiling and pipe ducts are inspected.

In conclusion we are very much in line with the view expressed in para 54 of your report, and any requirement for survey to be undertaken should be before commencing the building work. There would still be cost implications but at least that would protect the group most at risk, the construction workers.

Thank you for consulting us at this early stage.



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