

**COMMITTEE SUMMARY**

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**Title of the Audit:** Corporate Review – Management and Control of Asbestos within Glasgow Group Properties

**1. Introduction and Background**

The management and control of asbestos in properties is governed by the Control of Asbestos Regulations 2012. City Property (Glasgow) LLP (hereafter referred to as CPG) has an Asbestos Unit which is responsible for providing an asbestos surveying/sampling service when requested in line with the Services Agreement with the Council. The asbestos surveys/sampling are undertaken in properties owned by Glasgow City Council, most of the Council's arms length organisations (ALEOs) and City Property Glasgow (Investments) LLP's commercial properties.

MODUS is the asbestos management system used by the Asbestos Unit to record survey/sampling information and any property information received from the Council and/or ALEOs.

There are a number of parties involved in the management and control of asbestos across the Council group including:

- CPG's asbestos unit is responsible for providing asbestos surveys, sampling and advice.
- CPG manages an investment portfolio and manages the Council's surplus properties.
- City Building (Glasgow) LLP is the principal contractor for any works on sites with Asbestos Containing Material (ACM).
- The Council's Corporate Governance Unit, which contains the Council Health & Safety Team.
- ACCESS is the facilities manager for the Council's operational and non operational properties.
- The Scientific Services division of Land and Environmental Services (LES) which carries out testing of the samples taken during asbestos surveys.
- Each Services and ALEO as occupiers of property.

**2. Audit Remit**

The purpose of the audit was to seek assurance that there are adequate arrangements in place for the management and control of asbestos across the entire Glasgow City Council Group portfolio and that all parties involved in the process are aware of their responsibilities and that these are being carried out as intended.

The scope of the audit included:

- Ascertaining the arrangements in place across the Council group for managing the asbestos survey process across the entire property portfolio.

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- Confirming that there are procedures in place to escalate any serious concerns or issues identified.
- Reviewing these arrangements, commenting on any control weaknesses or gaps in the governance arrangements.
- Ensuring there is a process in place to conduct asbestos surveys on newly acquired properties, and arrangements are in place to review the surveys after any changes to properties.
- Ensuring that all parties are aware of these arrangements and that controls are operating as intended.
- Reviewing reconciliations of data to ensure consistency in the data held by all parties.

### **3. Audit Opinion**

Based on the audit work carried out at the time of the audit fieldwork the control environment has been assessed as unsatisfactory. The control environment contained 4 serious control deficiencies where the potential risk to the Council Group was significant. In total the audit identified 5 recommendations which the Council Group must address.

Since the audit fieldwork, the Council's Corporate Governance Unit has drafted Management Standards relating to Asbestos Management; once agreed these Standards will be rolled out to all Council Services. A Strategic Asbestos Management Group, encompassing the wider Council family, has also been established which is chaired by a representative from the Corporate Governance Unit. It is intended that this newly formed group will act as a key driver at strategic level in implementing policy/standards, sharing and adopting best practice, and ensuring that each service within the Council family fulfils its statutory obligations with regards to asbestos management

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### 4. Conclusions

Based upon the work carried out, the main conclusions reached during the audit were as follows:

- CPG has independently accredited (UKAS) documented procedures and quality manuals which the Asbestos Unit follow when conducting surveys/sampling.
- Although there is a document “Policy Arrangements for Managing Asbestos”, it is dated 2003 - it is out of date and there is no evidence that it has been reviewed or updated since 2003. As such there is a risk that not all parties involved in the process are aware of their responsibilities and how these interact with each other.
- Responsibility for ensuring asbestos is appropriately managed lies with each service/ALEO but no one officer has overall specific ownership of the process.
- CPG does not have a comprehensive list of all properties, built prior to 2000 that are used by the Council and its ALEOs. As such the auditor cannot be assured that all properties have received an asbestos survey/sampling.
- The MODUS system has limited technical capabilities and does not provide useful corporate management information.
- CPG does not receive notification of all asbestos removal/encapsulation works from the registered contractors carrying out work on properties containing asbestos, nor do they receive this information from the services/ALEOs.
- The MODUS system information is incomplete and out of date (e.g. demolished schools are recorded as “in-use”), increasing the risk that not all relevant properties are covered by the asbestos review process
- There is no central register of all recommendations contained in the Asbestos Surveys issued to clients. Furthermore, there is no follow up review to ensure that action has been taken to address the recommendations made.

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### **5. Recommendations**

Resulting from the conclusions, 5 recommendations for improvement, 4 rated high and 1 rated medium priority were identified. These recommendations and the responses are shown below.

### **6. Risk Assessment**

Based on the conclusions above, the recommendations in the Action Plan must be implemented to address the risk that the council will not effectively control the asbestos management process.

### **7. Recommendation for Committee**

It is recommended that the Head of Audit and Inspection submit a further report to Committee on the implementation of the actions contained in the attached Action Plan.

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Risk Ratings for Recommendations						
High	Key controls absent, not being operated as designed or could be improved. Urgent attention required.	Medium	Less critically important controls absent, not being operated as designed or could be improved.	Low	Lower level controls absent, not being operated as designed or could be improved.	
No.	Audit Recommendations	Priority	Accepted	Comments (if appropriate)	Officer Responsible for Implementation	Timescale for Implementation
<b>Key Control:</b> There are effective governance arrangements for the asbestos management process						
1	<p>The Corporate Governance Unit within the Council, as chair of the Strategic Asbestos Management Group in discussion with all stakeholders, must appoint a senior officer with overall ownership and responsibility for the asbestos management and control process. This senior officer must:</p> <ul style="list-style-type: none"> <li>ensure that formal documents are drafted which clearly set out the entire process for asbestos management within the council group and these should be in line with relevant regulations;</li> <li>ensure the documents identify the roles and responsibilities of each of the parties involved in the process;</li> <li>clearly identify the points at which the responsibility transfers from one party to another in accordance with the Services Agreements (SAs).</li> </ul> <p>Where any current ambiguity exists, the SAs must be clarified. Once compiled the document must be issued to all parties and kept up to date.</p>	High	Yes	The Asbestos Management Group has defined its terms of reference and scope. The issues raised under this recommendation are being addressed.	Council's Corporate Health & Safety Manager	This is currently being implemented. The terms of reference and scope of the Asbestos Management Group have been agreed.

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No.	Audit Recommendations	Priority	Accepted	Comments (if appropriate)	Officer Responsible for Implementation	Timescale for Implementation
2	<p>The Responsible Officer identified in recommendation 1 must ensure that the action from the first meeting of the Strategic Asbestos Management Group to obtain a comprehensive list of all properties occupied by both the Council and its ALEOS is compiled.</p> <p>Thereafter the newly compiled list must be reconciled to the properties recorded on the MODUS system and must reflect the current operational status of each property. Any discrepancies must be investigated and the MODUS system brought up to date.</p> <p>This list must be used to ensure that all properties are subjected to asbestos survey/sampling as required by Regulation.</p>	<b>High</b>	Yes	<p>ACCESS is currently working with service departments to compile this comprehensive list. This list will include the current operational status of each property</p> <p>CPG as custodians of the MODUS system will be responsible for carrying out the data matching task liaising with ACCESS, Service Departments and the Asbestos Management Group as appropriate.</p> <p>An appropriate programme of survey and sampling will be put in place</p>	<p>ACCESS and Service Departments. The Asbestos Management Group will monitor and coordinate this task.</p> <p>Asbestos Unit Team Leader (CPG) to carry out the data matching exercise. The Chair of the Asbestos Management Group will co-ordinate the investigation into the outstanding data matching queries.</p> <p>Service Departments and Asbestos Unit Team Leader (CPG)</p>	<p>March 2014</p> <p>From March 2014 onwards</p> <p>From March 2014 onwards</p>

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No.	Audit Recommendations	Priority	Accepted	Comments (if appropriate)	Officer Responsible for Implementation	Timescale for Implementation
3	The Strategic Asbestos Management Group must ensure that all Services/ALEOs notify CPG of all changes to a property which impact on the current asbestos survey records. Thereafter CPG must ensure that the MODUS system is updated in a timely manner in respect of these notifications of works. Both of these requirements must be included in the documented roles and responsibilities	High	Yes	Draft Management Standards have already been prepared for all Council service departments and are currently at the final consultation phase with stakeholders	Council Corporate Health & Safety Manager for ensuring that Management Standards are prepared and agreed with all service departments	Currently in progress. All service department Management Standards should be issued by the end of January 2014
4	<p>A central register of all recommendations arising from asbestos surveys must be created and kept up to date. The Council's Responsible Officer, through the Strategic Asbestos Management Group, must monitor to ensure that all required remedial action identified in survey reports is carried out.</p> <p>Regular reports on the progress of implementing these recommendations should be submitted to the Strategic Asbestos Management Group and CPG to ensure MODUS can be kept up to date.</p>	High	Yes	<p>Draft Management Standards have already been prepared for all Council service departments and are currently at the final consultation phase with stakeholders.</p> <p>The duty to monitor the remedial action is included in the Strategic Asbestos Management Group terms of reference.</p>	Council Corporate Health & Safety Manager for ensuring that Management Standards are prepared and agreed with all service departments	Currently in progress. All service department Management Standards should be issued by the end of January 2014

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No.	Audit Recommendations	Priority	Accepted	Comments (if appropriate)	Officer Responsible for Implementation	Timescale for Implementation
5	CPG in conjunction with the Corporate Governance Unit should undertake a review of the MODUS software to determine whether or not it is fit for purpose. If it is deemed to be not fit for purpose alternative solutions should be explored.	<b>Medium</b>	Yes	CPG to take this forward and present their findings to the Corporate Governance Team	Asbestos Unit Team Leader (CPG)	March 2014