

UNIVERSITY OF LONDON

ASBESTOS MANAGEMENT PLAN

1.0 Introduction

Regulation 4 for the Control of Asbestos at Work Regulations, 1987 which sets out a legal duty to manage asbestos, the University of London's Health and Safety Policy, and its asbestos protocol set the framework within which this Asbestos Management Plan operates. Both policy documents are available on the University's web site. Compliance with the Asbestos Management Plan is the responsibility of the University's Director of Estates and all other persons involved with any works affecting the fabric of the premises of the University of London or any other buildings or areas for which the University of London is the Duty Holder.

2.0 Responsibilities

Director of Estates

The Director of Estates has overall responsibility for the Division, and is responsible for the procedures and practices and overall strategic management of asbestos policy, including this plan.

Deputy Director of Estates

The Deputy Director of Estates chairs the Estates Division's Health and Safety Committee and acts on behalf of the Director of Estates in respect of this Asbestos Management Plan.

Head of Building Services

The Head of Building Services is responsible for the day-to-day management of asbestos through the Asbestos Manager.

Project Managers, Engineers and Workshop Supervisor

These persons within BSG have responsibility for undertaking a variety of maintenance tasks, from minor and reactive maintenance through to significant projects. These staff are involved in identifying work, preparing specifications, obtaining prices and raising purchase orders for work. They are usually the first to assess the work and must have full knowledge of all relevant procedures, and will consult the Asbestos Management Plan and Building Asbestos Register as part of the assessment.

Asbestos Manager

The Asbestos Manager is required to manage the day-to-day process of the Asbestos Management Plan. The Asbestos Manager is responsible for ensuring compliance with these procedures, issuing permits to work where appropriate, and organising and dealing with asbestos removal contractors, consultants and analysts. The Asbestos Manager liaises with the Divisional Administration Officer to ensure that records are kept up-to-date. The Asbestos Manager provides information and advice to staff, contractors, building managers and external consultants carrying out building work. All asbestos work MUST be routed through the Asbestos Manager before work is commenced on-site.

In the Asbestos Manager's absence, the Head of Building Services and the Deputy Head of Building Services deputise.

Divisional Administration Officer

The Divisional Administration Officer is the person who keeps the electronic asbestos register up-to-date, provides monthly information and checks that information is being correctly held.

University Health and Safety Officer

The Health and Safety Officer is appointed in accordance with Regulations 5 and 6 of the Management of Health and Safety at Work Regulations, 1999. The Health and Safety Officer has responsibility to monitor and review the effective planning, organisation and control of preventative and protective health and safety measures. This includes the review and monitoring of protocols established as part of the University Health and Safety Policy and the plans derived from the protocols, including the Asbestos Management Plan. The Health and Safety Officer reports to the Central University Safety Committee in respect of Health and Safety responsibilities. The Director of Student Services is the Health and Safety Officer's line manager.

Health and Safety Representatives

The Central University Health and Safety Committee has responsibility for ensuring compliance with the University's Health and Safety policies. The Estates Division Health and Safety Committee has responsibility for incorporating University Safety policies and protocols into local conditions and monitoring arrangements, promotion of risk assessments, ensuring appropriate training, considering reports from the University's Health and Safety Officer on accidents and working practices, encouraging the dissemination of Health and Safety information to staff and others, and considering resource implications in relation to policies and procedures.

Asbestos Consultant

The Asbestos Consultant is the consultant appointed under a term commission by the University.

Asbestos Analyst

The Asbestos Analyst is the analyst who will undertake the analysis of bulk samples taken for testing, and air-testing when required. The Asbestos Consultant may also undertake the duties of the Asbestos Analyst.

Asbestos Removal Contractor

The Asbestos Removal Contractor is the nominated contractor appointed under a term contract by the University.

The responsibility chart is shown at Appendix I.

3.0 Identification and Location of Material Containing Asbestos (ACMs) - Asbestos Register

The University maintains a register of known asbestos in each building it maintains and occupies. These registers are compiled from Type 2 surveys carried out and produced by UKAS-accredited consultants, in accordance with HSE guidance document MDHS100. The registers list in tabular form the type and location of ACMs, and make prioritised recommendations for action (eg. removal or regular reinspection). They also contain plans which have been annotated to show the location of ACMs.

Asbestos identified following surveys is categorised A, B, C, D or 0, based on guidelines using a numerical rating given to the parameters which are considered when conducting the risk assessment, these being: condition; accessibility; friability; treatment; content and analysis result. A combination of the scores from each of the parameters results in a number that falls into one of five possible categories. The higher the number, the higher the risk.

Category A. 17+

It is likely in a situation with such a high rating that individuals are currently being exposed to some level of asbestos fibre contamination. Situations falling within this category warrant urgent consideration.

This exposure will vary according to local conditions - for example, the intensity of use of a heating system or the nature of airflow and movement around a damaged ceiling. It may be possible to clarify the exposure level by use of atmospheric fibre counts. However, the concentrations involved are likely to be low in comparison with occupational exposure limits. In most circumstances immediate plans for removal or encapsulation of the asbestos concerned should be implemented.

Category B. 13-16 inclusive

Situations within this category still warrant urgent consideration, in that any slight deterioration in any one of a number of contributory factors will result in unacceptable deterioration within a short passage of time. In these situations, it is necessary for the asbestos to be removed or encapsulated on a programmed basis but within a specified timescale.

It is recommended that the maximum period for programming removal should be one year and that in the meantime, emergency repair and sealing operations should be undertaken where deterioration or damage occurs.

Category C. 8-12 inclusive

Situations within this category do not pose an imminent risk and the likelihood of fibre release is low under existing conditions. It would be most appropriate within this category to monitor the situation, as deterioration will occur with the passage of time. Situations within this category are inspected annually to ascertain any change in circumstances, which could require reassessment of priority rating into Category B. By the end of 2006 it is hoped that the frequency will be increased to six-monthly.

Category D. Less than 8

Situations within this category are low priority and are currently monitored every two years to ascertain any change in category. By the end of 2006 it is hoped that the frequency will be increased to annually.

Category 0. No asbestos detected

No further action is required.

4.0 Location of the Asbestos Registers

One copy of the Asbestos Register is kept in the building to which it refers (see the building log book for precise location) along with a copy of the Asbestos Management Plan. The local Building Manager has responsibility for their safe keeping. Another copy of each Building Asbestos Register and the Asbestos Management Plan is kept in Room SB4 in Senate House (quickly accessible by the Building Services Group's professional and trades staff). A third copy of each Building Asbestos Register and the Asbestos Management Plan is kept in the Asbestos Manager's office in Senate House.

5.0 Electronic Version of the Registers

The tables listing the known or presumed ACMs and the prioritised actions for them are stored on the Estates Division's dedicated server on the University computer system. The tables contain columns which show what action has been taken, and when. The electronic version is controlled by the Estates Division's Administration Officer (DAO). They are not a complete survey but provide information in summary form.

6.0 Method of Complying with the Recommendations of the Registers

- 6.1 Where removal is recommended it is the responsibility of the Project Manager for the building to arrange, via the Asbestos Manager, funding authority from the Head of Building Services, and then for the Asbestos Manager to arrange to have the ACMs removed within the recommended timescale. (See 9.0 for organisation of removal.)
- 6.2 Where reinspection is recommended, the Asbestos Manager will be responsible for re-inspecting the building and re-calculating the risk assessment algorithm value for any identified ACM, using current assessment parameters. Once reinspection has taken place the Asbestos Manager will advise the DAO, who will update the register. It will then be the responsibility of the Asbestos Manager to ensure that further inspections are carried out at the appropriate intervals or that any remedial work identified by the inspection and assessment. is actioned.
- 6.3 The recommendations made following the reinspection will be dealt with as 6.1 or 6.2 as appropriate. If, following reinspection, the asbestos has deteriorated and needs removal then the Asbestos Manager shall deal with it as set out in 6.1 and 9.0. The Asbestos Manager will decide when a further inspection is due and will advise the DAO accordingly.

- 6.4 The DAO will liaise with the Asbestos Manager each month to discuss any outstanding recommendations not actioned and any reinspections which are overdue.

The Director of Estates will take appropriate action to ensure that the programme is maintained.

7.0 Responsibility for Updating the Registers

- 7.1 It is the responsibility of the Asbestos Manager to notify the DAO upon the removal of any ACM and to pass on all relevant supporting documentation as set out in 9.0. In respect of reinspection to monitor the condition of the ACM, the Asbestos Manager will inform the DAO who will then update the table on the O:drive. The Asbestos Manager will substitute the updated table for the old one in all three hard copies of the register. A copy of the supporting documentation will at the same time be filed in all three copies of the register, the original to be retained by the AM.
- 7.2 The AM will carry out random checking to ensure that the updated information is being correctly held in the Asbestos Registers and will report any discrepancies to the Head of Building Services and/or the Deputy Director of Estates.

8.0 Procedures for Providing Information to Those Who Need It

- 8.1 All contractors and consultants employed by the University are required to confirm agreement to the University's *Safety Rules for Contractors*. These rules ensure that the University advises the contractor as to details of known or suspected asbestos as described in the Asbestos Register, and that the Asbestos Register and Management Plan be consulted before any work starts. They also explain what to do if asbestos is encountered unexpectedly. (See also 11.0.)
- 8.2 The University's directly-employed trades and supervisory staff are required to comply with the *Maintenance Operatives Handbook (MOH)*, which gives the same guidance as the *Rules for Contractors*.
- 8.3 The University's standard *Preliminaries* document, for use with specifications of work, re-states the requirements referred to in 8.1 and 8.2.
- 8.4 The Project Manager or other person in control of the work is responsible for ensuring that contractors, consultants or staff have all the relevant information and are aware of requirements before any job is started.
- 8.5 The Project Manager will organise the preparation of the Health and Safety Plan if CDM regulations apply, will appoint a Planning Supervisor, and will ensure that the requirements of the Asbestos Management Plan are incorporated into the Health and Safety Plan.
- 8.6 The Asbestos Manager is required to notify the Building Manager, the building maintenance provider(s), the University's Health and Safety Officer and the recognised Trade Unions of any work on ACMs prior to work starting.

9.0 Procedures for the Removal of Asbestos

General

- 9.1 It is University policy that work on ACMs will only be undertaken by approved contractors, licensed by the HSE. Before proceeding to undertake any work, Project Managers, Engineers and Supervisors should consider the flowchart at Appendix II and be guided by it. Should removal of ACMs be required, the Project Managers, Engineers and Supervisors should complete the form at Appendix III and send this to the Asbestos Manager, who will action the work requested. In the absence of the AM, his role will be undertaken by the Head or Deputy Head of Building Services.
- 9.2 The University has term contracts with an HSE-licensed contractor and a UKAS-accredited firm of analysts. The general principle is that work on ACMs must be carried out by an HSE-licensed contractor.
- 9.3 Should any specialist advice be required it will be the responsibility of the Asbestos Manager to obtain this by using term consultants appointed by the University. These consultants will, in addition, provide a laboratory analysis for bulk samples, and undertake independent air-tests on-site when required.

Permit to Work

- 9.4 The Asbestos Manager will use a Permit to Work for any work on ACMs, or where there is a risk that ACMs may be disturbed during the course of any works.
- 9.5 As a minimum, the Asbestos Manager will ensure that before a permit is issued:
- (i) an appropriate risk assessment has been carried out by the Project Manager or other competent person;
 - (ii) all appropriate University procedures have been followed, including notification to the Asbestos Manager (Appendix III); and
 - (iii) there is an acceptable written plan of work.
 - (iv) all affected parties have been informed (by the Asbestos Manager).

In each case more detailed information may be needed, dependent on the extent of works.

- 9.6 Contractors are required to report to Room SB4 during normal working hours to collect a contractor's pass and any necessary permits at the start of any work. At this stage they should be reminded by the Asbestos Manager of the need to comply with the University's rules and procedures for ACMs. If there is any doubt about the Contractor's understanding of arrangements, a permit should not be issued.

Refurbishment

- 9.7 Where proposed refurbishment will entail demolition or exposure of parts of the structure or fabric that could not have been seen during the type 2 asbestos survey (see 3.0), the Project Manager or other person in control of the work must have a pre-project type 3 survey carried out, and must ensure that the recommendations and findings of that survey are made known to the contractor before the refurbishment takes place. Any ACM that is liable to be disturbed by a demolition or refurbishment project will be removed prior to that project. The type 3 survey must be carried out by a UKAS-accredited firm, in accordance with the HSE document MDHS100. The Asbestos Manager will organise a survey in liaison with the Project Manager.

Minor Maintenance

- 9.8 Where minor maintenance is to be carried out in an area where there is a risk that ACMs might be disturbed, it is the person who is raising the order, ie Project Managers, Engineers and Supervisors, who has responsibility to ensure that a check of the asbestos register is made, and that the work envisaged is carried out so as not to expose the person undertaking the work to any risk. A written risk assessment must be completed by the Project Manager or other competent person in control of the work. A permit must be issued by the Asbestos Manager, who will follow the procedure set out in 9.5 and 9.6.
- 9.9 Generic risk assessments have been undertaken for work routinely carried out by in-house staff, including one for working in areas where ACMs are present. They have been issued to staff and are available on the “O” drive in the folder “Building Services Documents”. The risks associated with some routine maintenance tasks on or adjacent to ACMs have been analysed by the Institute of Occupational Medicine. Examples include work on old distribution boards, removing ACM-lined duct covers and heater panels, and adjusting valves on ACM-lagged pipes. Recommendations on procedure must be followed (eg appropriate PPE and RPE, use of type H vacuum cleaners, damping down, using hand tools). If the generic risk assessment does not apply, and a separate risk assessment is required in writing, this must be completed by a competent person, and signed before the order for work is signed. Training for such risk assessments has been provided. Records of training are retained by the DAO.
- 9.10 If a permit is required as a result of the Risk Assessment, a copy of the order and risk assessment should be passed to the Asbestos Manager for a permit to be issued. The original order should be sent to the contractor or in-house trades staff for the work to be undertaken, with a note indicating that a Permit to Work is required before the work is commenced.
- 9.11 If there is any doubt about the information contained on the order, or the undertaking of the work, then the work should not be done and should be queried in the first instance with the Project Manager, Engineer or Supervisor in charge, who will refer the matter to the Asbestos Manager for advice.

- 9.12 If the work requires the removal of ACMs, then the removal process is as provided in Paragraphs 9.1, 9.2 and 9.3.

10.0 Use of Consultants/Analytical Laboratories/Contractors

- 10.1 The University has set up term contract arrangements for the employment of specialist contractors/consultants for the provision of specialist advice and/or removal arrangements in relation to ACMs. In addition to the University's standard terms of employment within the Estates Division, the following apply to such contracts:

Consultants

Only consultants who have appropriate accreditation can be employed.

The following details must be supplied to and approved by the University:

- (i) public liability, employer's liability and PI cover;
- (ii) training records and qualifications of staff to be employed on the contract;
- (iii) references from organisations who have used their services;
- (iv) details of any legal action taken against them by the Health and Safety Executive;
- (v) Health and Safety Policy.

Analytical Laboratories

Any laboratory must be accredited by UKAS and to ISO 17025 for air sampling fibres in the air and be members of the Regular Interlaboratory County Exchanges (RICE).

For bulk sampling analysis laboratories should be able to provide proof of accreditation by UKAS for the testing of bulk samples.

Contractors

Contractors must be members of the Asbestos Removal Contractors Association (ARCA) or Asbestos Control and Abatement Division of the Thermal Insulation Contractors Association (TICA) and must provide a copy of their HSE Asbestos Licence, along with:

- (i) details of their public liability and employer's liability cover;
- (ii) training records of their employees;
- (iii) references from recently completed contracts;
- (iv) details of any action taken against them by the Health and Safety Executive or local authorities;

- (v) Health and Safety Policy.

11.0 Labelling of ACMs

The University is labelling ACMs where they are known to exist. A sample of the standard Asbestos 'Hazard Warning' label is at Appendix IV. **The absence of any labels indicating asbestos is present is not conclusive proof that none exists**, and if there is any doubt about the type of material, a specialist analysis should be undertaken or arranged by the term contractor or consultant, instructed by the Asbestos Manager.

12.0 What to do in an Emergency

- 12.1 If damaged or unexpected ACMs are encountered, staff, contractors and consultants are required to stop work immediately, secure the area to prevent further access, and seek the advice of the Project Manager or other person in control of the work.
- 12.2 The Project Manager should consult with the Asbestos Manager, Head of Building Services and/or the Deputy Director of Estates, and the University's Health and Safety Officer and take action as appropriate.
- 12.3 The Project Manager should compile a list of anyone who has been exposed to asbestos, record what action has been taken, and notify the University's Health and Safety Officer, who will notify the HSE.
- 12.4 In the case of fire, the local building manager is responsible for ensuring that the asbestos register is shown to the emergency services.

13.0 Use of Personal Protective Equipment (PPE) and Respiratory Protective Equipment (RPE)

- 13.1 In certain routine maintenance tasks the wearing of PPE and RPE is required. Examples are:
 - (a) Tasks where a risk assessment had identified the need for PPE and/or RPE.
 - (b) If a visual inspection of an area is required in order to establish if any ACMs are concealed (eg ducts).
- 13.2 Guidance as to when and where PPE/RPE is to be used will be issued separately and be included in the Maintenance Operatives Handbook.
- 13.3 Training is provided regarding the maintenance and use of RPE and PPE. RPE will only be used by personnel who are trained and competent in its use.

14.0 Training

- 14.1 Training will be provided for those involved in the operation of the Asbestos Management Plan. The DAO, in conjunction with the Deputy Director of Estates, is responsible for identifying, monitoring and co-ordinating the Estates Division training. The aim is to ensure that all staff and contractors understand how asbestos is managed in the workplace.

- 14.2 All staff are to be provided with general awareness training to cover:
- (i) understanding of the use of asbestos in buildings;
 - (ii) how to avoid exposure;
 - (iii) risk posed to staff;
 - (iv) what to do if you find asbestos;
 - (v) what to expect from maintenance staff and contractors.
- 14.3 All Project Managers and trades staff will be trained to ensure a thorough knowledge of 14.2 above and in addition:
- (i) what asbestos products are and where they are likely to be found;
 - (ii) how to ensure that work is not undertaken on any material without knowing if it contains asbestos;
 - (iii) the procedures to follow before any work is commenced where asbestos material could be disturbed;
 - (iv) what work can or cannot be done on ACMs;
 - (v) safe working methods for working on ACMs;
 - (vi) how to undertake an individual risk assessment.
- 14.4 Project Managers are competent in the inspection of ACMs.
- 14.5 All staff who manage Asbestos Removal Contractors will be trained in how to manage such contractors.
- 14.6 Trades staff are to be trained in the care and use of PPE and RPE.
- 14.7 Contractors and Consultants will be required to familiarise themselves with the Asbestos Management Plan and demonstrate a thorough understanding of these procedures.

15.0 Monitoring and Review of the Asbestos Management Plan

- 15.1 The Asbestos Management Plan will be monitored on a regular basis as follows:
- (i) at the Deputy Director's asbestos monitoring meetings;
 - (ii) at each Divisional Health and Safety meeting;
 - (iii) by the DAO/Asbestos Manager as part of routine daily work.

Items to be covered in such monitoring will be:

- (i) the level of information provided in the asbestos register and how it is being updated;
- (ii) the condition of ACMs left in situ and the adequacy and frequency of reinspections and compliance with the recommendations of the asbestos register;
- (iii) the provision of information to those who need it;
- (iv) the effectiveness of the procedures for the removal of asbestos;
- (v) progress on labelling ACMs;
- (vi) communication with and training of Project Managers, trades staff and contractors;
- (vii) effectiveness of training and awareness for all staff;
- (viii) recording of incidents and accidents and lessons learned;
- (ix) use of PPE and issues relating thereto.

15.2 The effectiveness of the Asbestos Management Plan will be formally reviewed every six months.

16.0 Summary of Procedures and Responsibilities

16.1 Compliance with Asbestos Register Recommendations

- Project Manager (PM) to obtain budget authority and initiate project in consultation with the Asbestos Manager (AM).
- AM to arrange removal or other remedial action.
- DAO to remind AM, Head of Building Services and PM of reinspection dates.
- AM to carry out reinspections and advise DAO of outcome.

16.2 Updating Registers

- AM to notify DAO of all changes and provide all supporting paperwork.
- DAO to update the electronic register.
- AM to update all three hard copies.
- AM to undertake random checks, recording the results.

16.3 Providing Information

- PM or other person in control of the work to ensure all contractors, consultants and University of London trades staff have consulted the register before work starts.
- AM to notify building manager and University of London Health and Safety Officer of planned work on ACMs.

16.4 Refurbishment

- Type 3 surveys commissioned as necessary.
- AM to ensure compliance with recommendations that follow from the type 3 survey.
- PM to ensure a Health and Safety Plan is prepared if CDM regulations apply.

16.5 Planned Removal Work

- AM to instruct term consultants, analysts and contractors as necessary.
- AM to ensure that these firms prepare risk assessments and method statements and give all proper notices to the HSE.
- Permit required from AM.

16.6 Routine Maintenance

- Workshop supervisor to ensure that safe practices (eg PPE, type H vacuum cleaner, damping down etc) are followed as necessary.
- Consult with AM where necessary.
- Ensure a risk assessment is undertaken.
- Permit required from AM if working in an area where ACMs are present.
- PM to ensure a Health and Safety Plan is prepared if CDM regulations apply.

16.7 Emergencies

- Whoever is carrying out the work, or sees a potential hazard should immediately seek the advice of the immediate line manager, the Asbestos Manager or Head of Building Services.
- Work must be stopped immediately if there is a risk to health and the area secured.

16.8 Training

- DAO to monitor and co-ordinate training, and to ensure that all staff receive training as planned.
- DAO to ensure staff are trained in the use of CDM regulations.

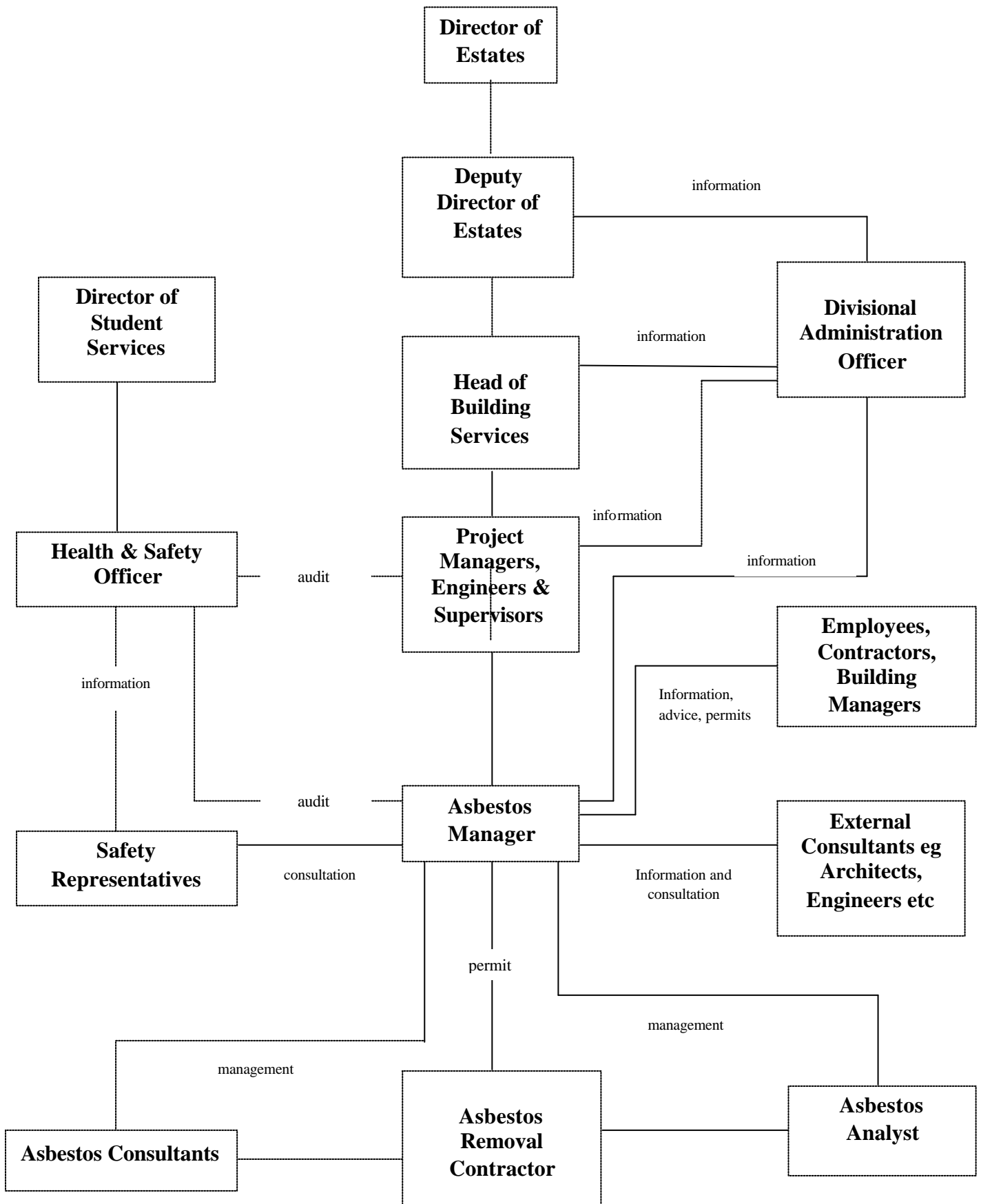
16.9 Permits to Work

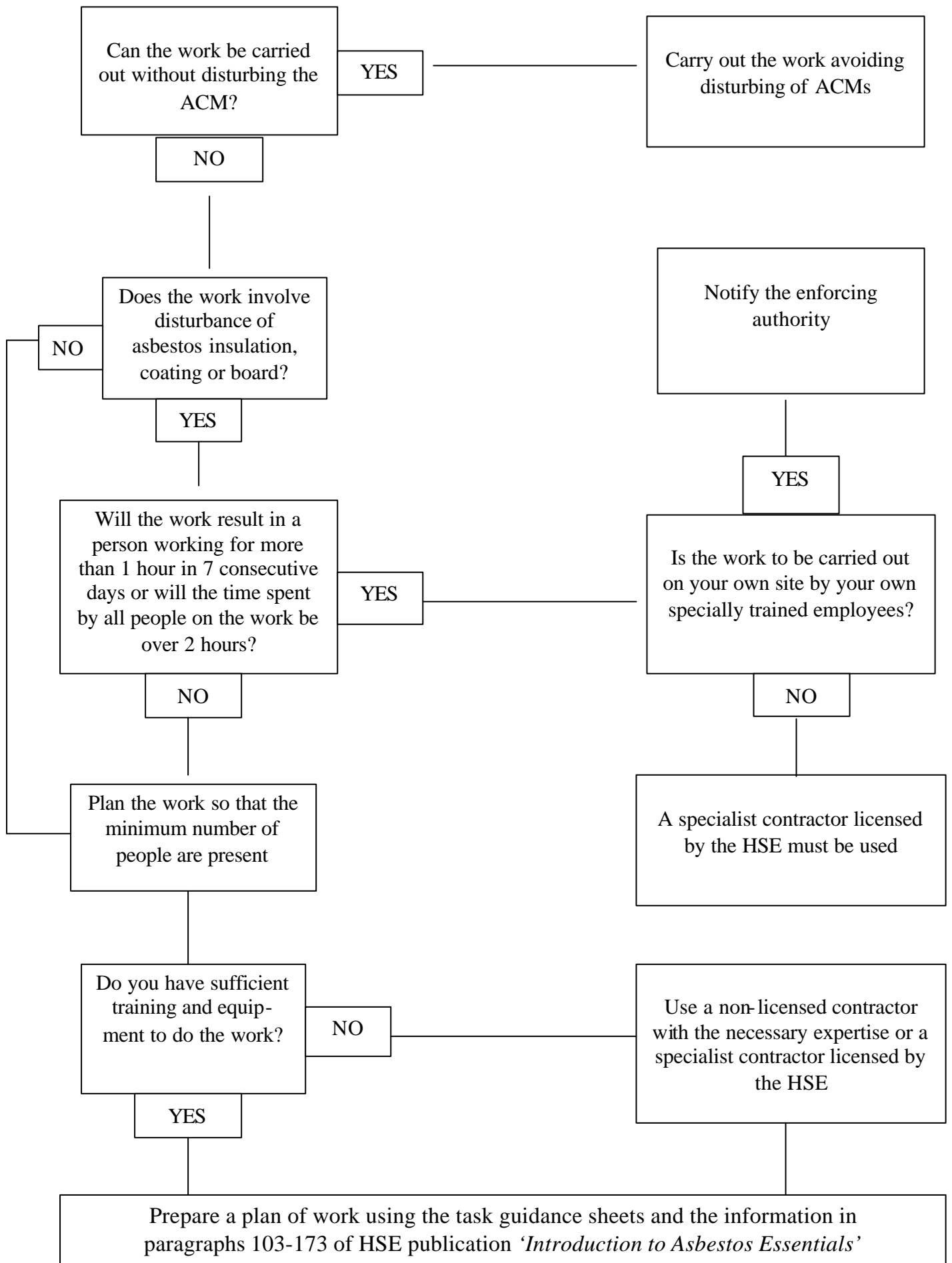
- Any asbestos removal, or work with or likely to disturb ACMs will require a permit to be issued by the AM.

17.0 Arrangements to Deal with Accidents, Incidents and Emergencies

In the event of an unplanned release of asbestos or material suspected to be asbestos, the following steps will be taken to mitigate the effects of the event:

1. Wherever practicable, the area shall be vacated and sealed, and access to the affected area will be restricted to those dealing with the emergency.
2. Staff or Contractors entering the area will wear appropriate respiratory protective equipment and protective clothing.
3. The area will be cleaned of dust and fibres in accordance with HSE guidance.
4. Suspect material will be bulk sampled and tested for asbestos.
5. Clothing and tools used during the clean up, and clothes worn by those personnel exposed by the event will be double-bagged in approved asbestos waste bags and tagged pending the outcome of the test sample.
6. If the results of the analysis of the bulk sample are negative for asbestos, then clothing may be returned to its owner and steps 7-11 omitted.
7. Personnel exposed by the event and during the clean-up will carry out appropriate personal decontamination.
8. An air test of the area will be undertaken to ensure there are no airborne fibres present.
9. Reoccupation of the area will not be allowed until the reported airborne fibre concentration is <0.010 fibres/ml.
10. A record of exposure will be kept by the University's Health and Safety Office, in the Asbestos Exposure Record.
11. Medical surveillance (and counselling if necessary) will be offered to exposed staff if appropriate.
12. A root cause analysis will be carried out by the AM to establish why the event occurred.
13. The Asbestos Management Plan will be reviewed and revised as appropriate to prevent further similar incidents.





University of London Asbestos Works Form

Notification to Asbestos Manager

Building:			
Location:			
Proposed Work/Nature of Inspection:			
Start Date:		Project Length:	
Signed:		Date:	
Safe to occupy prior to works:	YES/NO		

Notification from Asbestos Manager

Precautions Required/Results of Inspection:				
Remaining Asbestos Materials:				
Update Register (DAO):		Signed:		Date:
Permit Issued (No.):		Signed:		Date:
Clearance Certificate Obtained and Attached:		Signed:		Date:

CIRCULATION (tick as appropriate):

1)	Project Manager
2)	DAO
3)	AM - File copy
4)	Health and Safety Officer
5)	Building Manager

LABELLING OF ASBESTOS

Hazard Warning Sign

This sign will identify the known location of asbestos:

