

## Asbestos Management Policy and Plan

### 1. Introduction

This Asbestos Management Plan (along with latest asbestos survey documentation) is designed as a tool, to be used for the ongoing safe management of the identified asbestos containing materials (ACMs) across the University of Greenwich (UoG) Estate, to achieve full compliance with the Control of Asbestos Regulations (CAR) 2012, specifically regulation 4, and best practice.

### 2. Objectives

This plan is designed to:

- Establish a safe system for the management of asbestos containing materials (ACMs), from identification and regular inspection through to maintenance and planned removal as and when that becomes necessary, supported by a robust document management system for all asbestos related documentation.
- Identify individual responsibilities of key university staff and external service providers for ensuring compliance with CAR 2012, Reg 4.
- Identify information and training requirements for managers, internal staff, consultants and contractors to achieve compliance with CAR 2012, Reg 4.
- Implement a structured approach to asbestos removal and remediation

### 3. Surveys, Regular Inspections and Asbestos Registers

UoG use UKAS accredited surveyors to undertake asbestos surveys (including additional sampling of suspect materials) on all of its premises in accordance with HSG264 (2nd Edition) Asbestos: The Survey Guide. Existing information was reviewed in 2007 with an asbestos register created for each campus

In the event of specific information requiring clarification then the Responsible Person (Asbestos) hereby referred to as RP(Asbestos) should be contacted.

**Management surveys** are to be undertaken on new acquisitions built before 1999 (when supply and use of all forms of asbestos was prohibited in the UK) and revisited as required on existing buildings, under the guidance of the UoG RP(Asbestos).

Initial management surveys were completed between 2011 and 2014. These surveys were revisited in 2022 with all buildings previously identified as containing ACMS being resurveyed.

ACMs considered by the surveyor to be in a sound condition at the time of survey are recorded as such and will be labelled with the standard red asbestos warning label where possible.

Using the management surveys as a point of reference, all ACMs will be inspected for damage at least annually by an accredited asbestos surveyor, following re-inspections the asbestos register will be updated. All re-inspections will be undertaken by the contracted asbestos consultant.

If asbestos is damaged or debris is found, a Licensed Asbestos Removal Contractor (LARC) will be engaged to remove or encapsulate the material and clean the area involved. Air clearance monitoring will be undertaken following/during the works if there is a likelihood of fibre release above the control limit.

**Demolition and refurbishment surveys** are required before any refurbishment or demolition work is undertaken in any building built before 1999. They may also be required in other circumstances e.g. when more intrusive maintenance and repair work will be carried out or for plant removal or dismantling.

The University has progressively removed ACMs from its premises as and when major refurbishment or demolition has been undertaken and the registers have been updated accordingly. All asbestos removal has been carried out by licensed asbestos removal contractors (LARC's) and disposed of in accordance with the Hazardous Waste Regulations 2005. This practice will continue until such time as all ACMs have been removed from premises.

NOTE – All surveys requests should be channelled through, and agreed by, the RP (Asbestos)

As from 2024 all asbestos information will be available through an electronic **asbestos register**. UoG have utilised their contractor management system, SOTERweb as the asbestos register. This can be accessed through <https://uog.soterweb.org.uk/>

The asbestos register details the known or suspected ACMs present in each building and are used to detail the exact location, type and condition of material and quantity present. Further, it details areas of non-access or any material that has been sampled and confirmed as no asbestos detected.

In the event of the Fire & Rescue Services attending campus out of hours asbestos information will be made available through the Security Hubs.

## 4. Limitations

Limited information is currently available on the following: -

- Any asbestos materials that may be associated with underground services including drainage and mains electricity, such as asbestos cement (AC) or redundant heating services such as asbestos insulation (AI): probability of this is low; risk of asbestos exposure if AC present is low, but risk of exposure high if AI is present.

# Health and Safety Services



- Any asbestos waste that may be present in any made-up ground beneath or around the building: probability of this is very low, and risk if present depends on whether the material is AC or AI.
- Any redundant pipe services that may be concealed within the structure of pre-1999 buildings, which might be insulated with asbestos insulation: probability of this is low, but risk if present is high.
- Any flues, soil pipes or similar concealed within the structure that might be of asbestos cement: probability of this is low, and risk if present is low.
- Any bonded gaskets within heating or hot service pipe work or vessels that might contain asbestos: probability is high, but risk if present is low.
- Any asbestos components within electrical distribution boards, such as asbestos rope flash guards to fuse carriers: probability is high, but risk if present is low.

## 5. Roles & Responsibilities

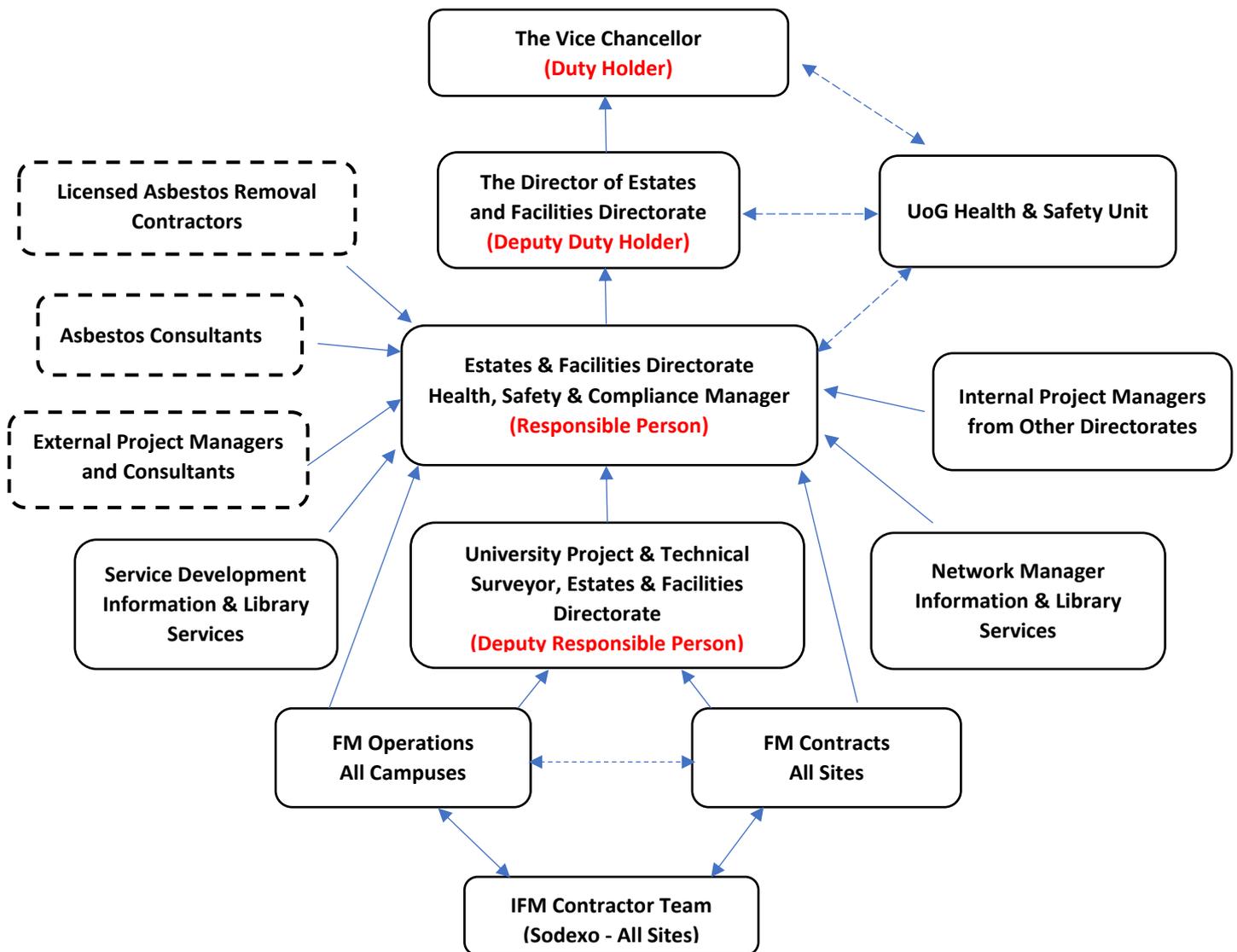


Figure 1: Asbestos Lines of Responsibility

## 5.1 Formally Appointed Roles

The below (highlighted **red** in figure 1 above) shall be formally appointed in writing:

### 5.1.1 Duty Holder (Vice Chancellor)

UoG is the duty holder under the Control of Asbestos Regulations 2012; this duty shall be undertaken by the Vice Chancellor hereafter called the 'Duty Holder'.

They are responsible for:

- Ensuring compliance with CAR2012.
- Seeking assurance from the Deputy Duty Holder that there is an Asbestos Management Plan in place, which is subject to review.
- Supporting requests to maintain sufficient resources to implement the Asbestos Management Plan, including but not limited to staff, training and funds for asbestos works as required.
- Ensuring an effective organisational structure is in place to implement the asbestos management plan.

### 5.1.2 Deputy Duty Holder (Director of Estates and Facilities Directorate)

To ensure that all ACM's across the UoG estate are suitably controlled and managed with appropriate resources, this duty shall be delegated to the Director of Estates & Facilities

They are responsible for:

- Ensuring all ACMs across the UoG estate are suitably controlled and managed.
- Working with the Duty Holder to ensure that suitable resources are available for management of ACMs.
- Representing the Duty Holder and assuming responsibilities for formally issuing reports on the management of asbestos.
- Immediately advising Health & Safety Services (HSS) if contact is made by the HSE (The HSU are the primary point of contact for all HSE enquires)
- Deputising for the role of Duty Holder in their absence.
- Formally appointing a Responsible Person (Asbestos) and Deputy Responsible Person (Asbestos) to take day-to-day responsibilities for the management of asbestos.
- Approving asbestos removal programme budgets and, when advised by the RP (Asbestos), approving additional expenditure for testing, investigation and auditing of processes in respect of asbestos.
- Ensuring that all Estates & Facilities employees understand and are competent to undertake their responsibilities as identified in these procedures.
- Overseeing the development and implementation of the Asbestos Management Plan, including, but not limited to, ensuring:
  - Adequate progress with remediating ACMs.

- The asbestos register is compliant with CAR2012 and consulted upon.
- Awareness of the asbestos management plan by all staff, contractors and consultants.
- All buildings due for major redevelopment have a refurbishment or demolition survey completed.
- Any incident that involves an uncontrolled release of asbestos fibres that could result in persons being exposed to asbestos is thoroughly investigated and any investigations carried out are acted upon.
- Ensuring the Asbestos Management Plan is reviewed on an annual basis by the RP (Asbestos).

### 5.1.3 Responsible Person (EFD Health, Safety & Compliance Manager)

The EFD Health, Safety & Compliance Manager undertakes the role of the Responsible Person (Asbestos) on behalf of UoG. The post holder should have a suitable background in the role of asbestos management, hold a P405 Asbestos Management in Buildings qualification, and ensure that senior management understand their obligations on the management of asbestos.

They are responsible for:

- Undertaking the day-to-day function of asbestos management across the university, and act as the central point of contact for all asbestos related matters.
- Arranging for management surveys to be undertaken to all university buildings unless there is documented evidence to show they were built after 1999 and deemed asbestos free. Consideration should be given to adjoining structures and equipment that has been brought in from other buildings in addition to date of construction.
- Ensuring any new additions to the University's estate are subject to an Asbestos Management Survey and the results placed on the asbestos register; in the event of sale or lease of university premises, copies of site-specific asbestos surveys and removal records and the asbestos register are supplied to the party in control of the premises.
- Ensuring all refurbishment or demolition works carried out in buildings that were constructed prior to 1999 do not commence until a refurbishment and/or demolition survey has been completed.
- Ensuring all asbestos incidents are recorded on the Accident Management System (AMS), are investigated, details recorded, recommendations implemented, and records of exposure are retained.
- Advising on changes in legislation and associated implications which may impact on management arrangements.
- Monitoring performance of Asbestos Consultants and Licensed Asbestos Removal Contractors
- Managing the asbestos PTW process through SOTERweb
- Delivering, or arranging delivery of, asbestos awareness training

- Ensuring their P405 training is refreshed every 5 years
- Ensuring that external consultants and contractors, involved with intrusive works, are trained in asbestos awareness.
- Commissioning ad hoc asbestos surveys/bulk sampling/air testing as required.
- Ensuring that all necessary repairs, labelling or removal of ACMs are carried out in accordance with current legislation.
- Delivering asbestos updates to the EFD Health & Safety Committee and an annual report to the University Health, Safety, Sustainability & Wellbeing Board
- Notifying the Integrated Facilities Management Provider of proposed remediation work, as per the Asbestos Remediation Works Notification & Communication flow diagram in Appendix B.
- Ensuring there is continued liaison with Information and Learning Services (ILS) with regards to their project work, providing guidance or assistance, with regards to asbestos, when required.
- Ensuring all those who require access to the electronic asbestos register are able to do so, providing guidance, support and training as required.

#### 5.1.4 Deputy Responsible Person (EFD Project and Technical Surveyor)

The EFD Project and Technical Surveyor undertakes the role of Deputy Responsible Person and undertakes the role of RP (Asbestos) in the absence of the Responsible Person. The post holder should have adequate experience in asbestos management and hold a P405 Asbestos Management in Buildings qualification.

They are responsible for:

- Providing cover for the RP (Asbestos) in their absence
- Maintaining communication flow when the RP (Asbestos) is out of the business
- Ensuring their P405 training is refreshed every 5 years

In the event of the RP(Asbestos) being out of the business for a significant period of time, the Deputy Responsible Person will seek additional support if required through the External Asbestos Consultant

## 5.2 Other Non-Appointed Roles

The below are not formally appointed in writing, but have non-appointed responsibilities under CAR 2012 and within this plan

### 5.2.1 Asbestos Consultancy Services

The University engage an Asbestos Consultant to support all appointed duty holders in implementing and maintaining the AMP.

They are responsible for:

- Supporting the RP (Asbestos) in achieving compliance with all current legislation and associated Approved Codes of Practice and Guidance.

- Ensuring all information regarding asbestos containing materials for all University properties is passed to the RP(Asbestos) and data is uploaded onto the University asbestos register.
- Undertaking Management and Refurbishment and/or Demolition asbestos surveys, inspections, re-inspections, and air monitoring on University buildings as directed by the RP(Asbestos)
- Ensuring that only suitably qualified and competent UKAS accredited surveyors / laboratories and HSE licensed asbestos removal contractors are selected to deliver the services required for implementation of the University's AMP, asbestos surveys, testing of materials, periodic inspection of ACM in-situ maintenance, repair, encapsulation and removal of ACM, independent inspection, testing and certification of removal works.
- Where formally requested, managing and monitoring the asbestos removal process to ensure all works are undertaken in complete compliance with all asbestos legislation.
- Delivering asbestos related training as requested by UoG.
- Providing project management services as requested by UoG.
- Evaluating asbestos quotations and plans of work, feeding back on value for money and proposed work methods.
- Maintaining UKAS accreditations for all asbestos related services.

## 5.2.2 Capital Project Managers

The Capital Project team have responsibilities in relation to the identification of asbestos, provision of information and record keeping.

They are responsible for:

- Engaging with the RP(Asbestos) at the earliest opportunity regarding all proposed projects, to evaluate existing asbestos related information.
- Ensuring that contractors and consultants engaged on project works have received, are aware of and have checked the asbestos register, available asbestos information and management arrangements, prior to commencing works, including having received a copy of this policy, signed acceptance and returned for file.
- Ensuring that all required information, as identified in HSG264 guidance, is supplied to consultants when quoting for survey work.
- Liaising with the RP (Asbestos) on all asbestos related works on projects under their management at the earliest opportunity.
- Issuing all asbestos information relating to projects under their management to the RP(Asbestos) in a timely manner, at the absolute latest upon project completion.
- Ensuring only UoG approved consultants/contractors are employed on a project, and make an allowance for documentation review and updating the asbestos register when producing the project pack.

- Ensuring that all contractors have attended, and are able to produce certification of attendance, a classroom UKATA/IATP accredited asbestos awareness training session within the last 3 years, and regular refresher training.

### 5.2.3 EFD Site Managers.

Any invasive maintenance works likely to either disturb or take place near known asbestos should be managed in a similar manner to project works.

They are responsible for:

- Ensuring the asbestos register is checked to confirm the presence of asbestos.
- Confirming whether the work activity will disturb the asbestos identified.
- Contacting the RP(Asbestos) for further guidance, or sampling if required (see appendix A)
- Ensuring all contractors and consultants engaged on maintenance works are made aware of this policy, and the management arrangements identified within, including signing acceptance of the plan and returning for file.
- Ensure asbestos information is readily accessible, checked and understood by all maintenance contractors prior to commencing works.
- Engaging with the RP (Asbestos) at the earliest opportunity.

When the EFD Site Manager commissions works, they are the primary point of contact for the works and any subsequent correspondence relating to staff, student or contractor questions or queries

### 5.2.4 Integrated Facilities Management (IFM) Service Provider's Staff

The IFM Managers shall ensure, that all directly and contracted staff that come into contact with asbestos as part of their day-to-day works are;

- Aware of how to access asbestos information (see Appendix A)
- Aware of how to report damaged ACMs
- Trained in asbestos awareness to an acceptable level, which is evidenced through regular monitoring.
- Working in accordance with UoG's contractor management arrangements.
- Are familiar with the Asbestos Discovery Emergency Procedure (see S(7) below)
- Ensure control measures are correct and in place for working adjacent to known or presumed ACMs.
- Ensure that all contractors used on the IFM contract, who undertake intrusive works, have signed and returned the AMP acceptance slip (Appendix C)
- Ensure that the communication lines within Appendix B are followed at all times, flagging up any issues of lack of communication or delayed communication.

## 5.2.5 Director of Information and Library Services (ILS)

Where contractors, working under instruction from ILS, are working in/intending to work in buildings where asbestos has been identified or likely to be present, the Director of ILS is responsible for ensuring-

- The RP (Asbestos) is made aware of any ILS related projects to determine if an R&D Survey is required.
- Suitable systems and processes are designed and implemented to ensure that ILS and their contractors are fully compliant with the requirements of this AMP.
- There are sufficient resources available to ensure full compliance with this AMP.
- All those working on behalf of ILS, either direct or subcontracted, are made aware of the requirement to seek advice from the RP(Asbestos) prior to undertaking any intrusive works.
- All members of ILS Services who manage installation or upgrade works have attended asbestos related training
- All external consultants and contractors, involved with intrusive works, are trained in asbestos awareness.
- All newly discovered or suspected ACMs are referred to the RP(Asbestos)
- All ILS contractors undertaking intrusive works have signed and returned the AMP acceptance slip (Appendix C)

## 5.2.6 Health & Safety Services (HSS)

The HSU will act as the independent body in overseeing the asbestos management arrangements. This will include, but not be limited to:

- Being the initial point of contact for the HSE in the event of an enquiry (Deputy Duty Holder/RP(Asbestos) should be advised of any such enquiry.
- Ensuring periodic independent audits of the AMP and the management regime are taking place.
- Providing independent and impartial advice and assistance where required
- Reviewing any reported asbestos related incidents and where applicable report such incidents to the HSE as per the requirement of the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013.
- Providing advice on asbestos related training to Faculties and Directorates (other than EFD)

## 5.2.7 Licensed Asbestos Removal Contractors (LARC)

The University uses licensed asbestos contractors for **all** asbestos remediation works. The Licensed Asbestos Removal Contractor is responsible for the following:

- Supporting the RP(Asbestos) in achieving compliance with all current legislation, and associated HSE Approved Codes of Practice and Guidance.
- Undertaking asbestos remedial works on University buildings as directed by the RP(Asbestos).

- Ensuring all information regarding asbestos remedial works (Plan of Work, ASB5 notifications, consignment notes, etc.) is passed to the RP(Asbestos) for inclusion in the University Asbestos Files.

## 5.2.8 Senior Leaders

Pro Vice-Chancellors, Deputy Deans, Faculty Operating Officers and Directors of Office are responsible for ensuring staff, consultants and contractors under their control, undertaking any works to the fabric, services to or within a building, tunnels, grounds, voids or service ducts, do so in consultation with the Estates and Facilities Directorate. This is to ensure that all risks from possible asbestos exposure are mitigated.

## 6. Information, Instruction and Training

The **RP (Asbestos)** and **Deputy RP(Asbestos)** shall be trained in Management of Asbestos in Buildings, certified to the P405 standard. This will be subject to five yearly refresher training.

**All internal staff with dedicated duties within the plan** shall receive classroom delivered asbestos awareness training in relation to the Duty to Manage Asbestos. This will be subject to three yearly refresher training.

**Estates & Facilities Directorate employees, other maintenance staff and those employed by ILS**, who may be exposed to asbestos during the course of their work, are to have asbestos awareness training in accordance with the Control of Asbestos Regulations. This training will be refreshed on an annual basis. Any new employee within the Estates and Facilities Directorate to whom this policy is relevant will receive such training as soon as is reasonably practicable after the commencement of their employ.

**Other Senior Leaders** that have persons within their department that may be at risk of exposure to ACMs must contact Health & Safety Services, who will advise of appropriate training.

**All external consultants and contractors** are required to supply evidence of adequate and appropriate information, instruction and training of their employees with regard to ACMs.

## 7. Asbestos Discovery Emergency Procedures

On discovery of an ACM in a damaged / poor condition or material suspected to be an ACM during work activity the following procedures will need to be followed:

- On discovery of a damaged ACM or on damaging an ACM, **stop work and secure the areas immediately.**
- If the ACM / suspected ACM is in a poor condition, **ensure no other persons enters the work area / room.**

- Radio or telephone the work supervisor.
- If there is dust or debris on clothing, carefully remove the clothing and put in a plastic bag. This will be double bagged and removed by a licenced contractor.
- Wash thoroughly by using the nearest facility or if available take a shower.
- Leave the washing facility clean.
- Report the problem to the relevant EFD Site Manager, Responsible Person (Asbestos) or the Deputy Responsible Person (Asbestos) immediately.
- Put up warning signage stating 'possible asbestos contamination'.

## 8. Additional Resources

### 8.1 Primary Legislation

The below Act provides the primary legislation.

- The Health and Safety at Work etc. Act 1974 (HSWA)

### 8.2 Additional Legislation

The following documents provide legislation that sit under the primary legislation.

- The Management of Health and Safety at Work Regulations 1999
- The Control of Asbestos Regulations 2012 (CAR)
- REACH (Registration, Evaluation, Authorisation and Restriction of Chemicals)
- Hazardous Waste (England and Wales) Regulations 2005
- The Construction (Design and Management) Regulations 2015 (CDM)
- The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013

### 8.3 Approved Codes of Practice (ACOP)

- L143 (2nd Edition) Managing and working with asbestos

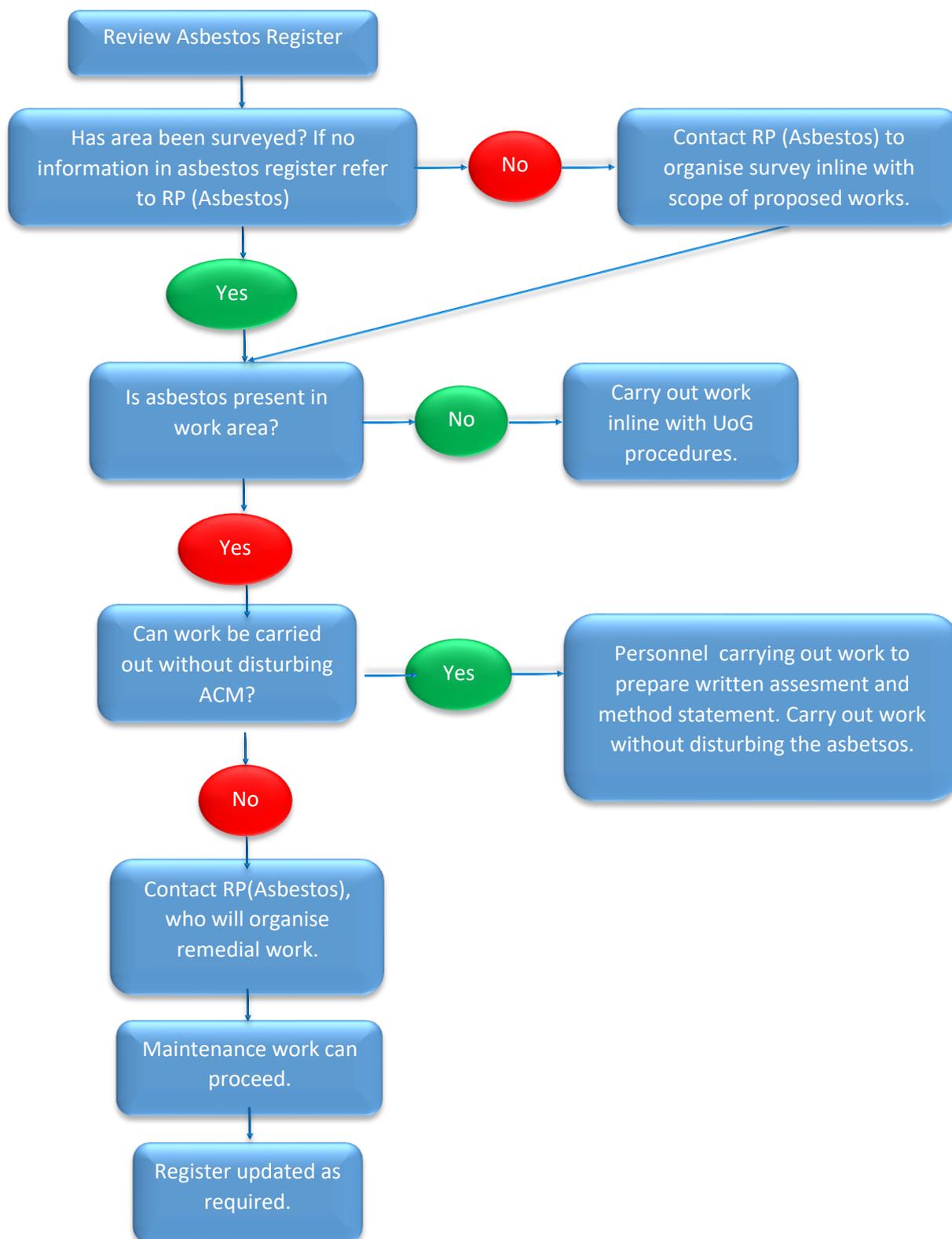
### 8.4 Guidance

The following documents provide guidance from the Health and Safety Executive (HSE) on asbestos:

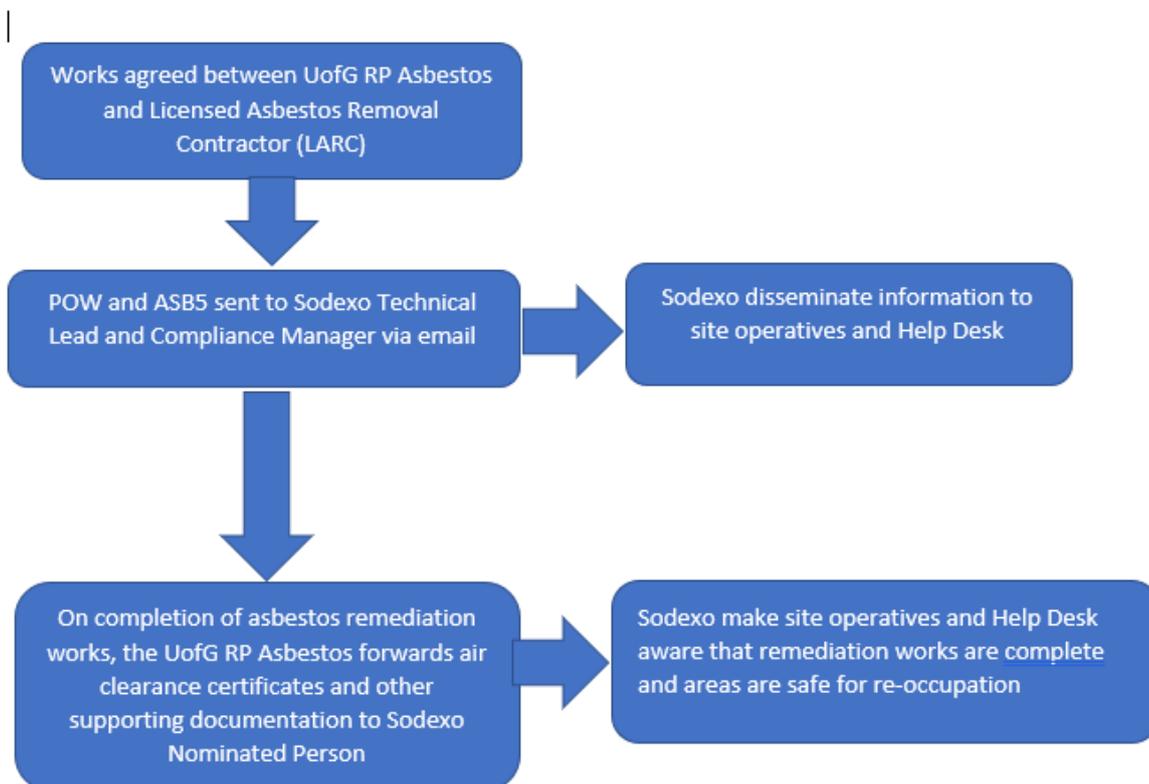
- HSG 264 (2nd Edition) Asbestos: The survey guide
- HSG 248 (2nd Edition) Asbestos: The Analysts' Guide
- HSG247 Asbestos: The licensed contractors' guide
- HSG 210 Asbestos essentials
- HSG227 A comprehensive guide to managing asbestos in premises
- ING223 (rev5) "Managing asbestos in buildings: A brief guide" (2012).

More information is available at <http://www.hse.gov.uk/asbestos/index.htm>

## APPENDIX A Maintenance Works - Flowchart



## Appendix B Asbestos Works and Communication (IFM Contractor)



Sodexo Nominated Person – Head of Technical Services

## Appendix C: Acceptance of AMP

### Estates and Facilities Directorate

I have received a copy of UofG's Asbestos Management Plan and will comply with all requirements within.

This document will be forwarded to colleagues within the company/department as appropriate.

I will take all necessary precautions to ensure no one is exposed to asbestos, either deliberately or inadvertently, while undertaking, designing or instructing work on UofG's property.

Signed \_\_\_\_\_

Name (Print) \_\_\_\_\_

Company/Department \_\_\_\_\_

Date \_\_\_\_\_

Comments-