Safety Standard

Asbestos Management Plan

Version 8.0

May 2015
# UNIVERSITY COLLEGE LONDON STANDARD
## ASBESTOS MANAGEMENT PLAN

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POLICY STATEMENT

This policy supplements the University College London (UCL) Health and Safety Policy which states that: the university recognises its duty to provide a safe place of work and a healthy working environment. We understand how these are essential elements of a successful organisation. We believe that excellence in the management of health and safety is a fundamental part of our strategic plan.

University College London recognises it’s responsibilities and duties under the Control of Asbestos Regulations 2012 (CAR) and will take appropriate action to ensure the health and safety of staff, students, contractors and others who may be affected by the risks associated with asbestos containing materials present in buildings within the University estate.

The Estates Departement is tasked with the responsibility for the management of all building maintenance, alteration and refurbishment works in University buildings. With regard to asbestos, the aim of this document is to ensure the University’s compliance with the Duty to Manage under Regulation 4 of CAR.

This regulation places a specific legal duty on every person to identify materials containing asbestos in any premises they own, occupy and manage, or for which they have a responsibility to assess the risk of those materials and to ensure that a management system is in place that responds correctly and appropriately to the materials present. The University accepts that it is the legal “duty holder” and has prepared a policy to meet its legal commitments.

The University Policy is:

- To prevent the exposure of staff, students and others to the health risks associated with asbestos.
- Appoint a competent and suitably qualified person to undertake the role of Appointed Person as identified in HSE guidance HSG264 ‘Asbestos: The Survey Guide’ (Ref. 2). This role will carry the title Asbestos Manager (Appointed Person)
- To provide adequate resources in support of this Asbestos Management Plan.
- To identify and monitor Asbestos Containing Materials (ACM’s) in University buildings, equipment and areas under its control; to assess the level of risk, maintain an asbestos register and carry out a programme of removal or containment.
- To promote awareness of asbestos and the Asbestos Management System (AMS) database through training and induction of relevant staff and frameworks consultants and contractors.
- To make the information on the Asbestos Management System (AMS) freely accessible to those undertaking work on University properties.
- Implement and maintain an effective Asbestos Management Plan (AMP) to ensure that all ACMs are maintained in a safe condition or alternatively are isolated or removed.
- To provide guidance to staff on the management of asbestos relevant to projects, operations and maintenance activities throughout the estate.
To only engage appropriately trained, qualified and competent persons to undertake any work with asbestos containing material (ACM), including their safe management, surveying and abatement/removal.

To regularly review the Asbestos Management Plan every 12 months.

Amend Asbestos Management Plan when following new statutory or legislative changes.

Provide adequate and timely resources to enable effective implementation of the AMP.
1.0 INTRODUCTION

This document is the Asbestos Management Plan (AMP) and sets out the University College London’s policy and procedures for managing the risks from Asbestos Containing Materials (ACMs) throughout its estate.

Some buildings owned or occupied by the University were built or refurbished at a time when the use of ACMs in their construction was common. Therefore this Plan is designed to effectively manage and minimize asbestos related health risks to staff and other persons working or otherwise occupying University premises.

The presence of an ACM in itself does not constitute a danger. However, there is a potential risk to health if such material is disturbed and damaged. An isolated accidental exposure to asbestos fibers for a short duration is extremely unlikely to result in the development of asbestos related diseases. However, regular exposure even at relatively low levels can present a risk. As well as people employed in the building trades, inadvertent exposure (and consequent risk) can occur in other groups of people e.g. installers of I.T. systems, security, fire alarms, smoke detectors, etc.

Working with, and managing, ACMs is controlled by legislation, primarily the Control of Asbestos Regulations 2012 (CAR 2012). Other relevant legislation includes the Health and Safety at Work Act 1974 and the Management of Health and Safety at Work Regulations 1999.

1.1 ABBREVIATIONS

| ACM    | Asbestos Containing Material |
| AMP    | Asbestos Management Plan     |
| AMS    | Asbestos Management System (Database) |
| CAR    | Control of Asbestos Regulations 2012 |
| HSE    | Health & Safety Executive    |
| UKAS   | United Kingdom Accreditation Services |
| UCL    | University College London    |
| RIDDOR | Reporting of Injuries, Diseases and Dangerous Occurrences Regulations |
1.2 PURPOSE

The purpose of this Asbestos Management Plan is to set out the mechanism, roles and responsibilities by which ACMs are to be managed. It includes details on how the University intends to:

- Demonstrate University’s commitment to comply with the Control of Asbestos Regulations
- Clearly identify the responsibilities of the duty holder and appointed competent persons
- Detail the mechanism by which the University shall prevent the exposure of staff, students and others to asbestos and prevent the spread of asbestos to the lowest levels reasonably practicable.

This shall include:

- Identify all ACMs and manage associated hazards based on assessment of the risk they prevent and prioritisation of action
- Effective control of any work or activity likely to affect ACMs by project
- Monitor and maintain ACMs in good condition where it is assessed as being safe to leave them in situ
- Respond to and manage any emergencies involving ACMs
- Procedures when undertaking operation and maintenance work
- Procedures when undertaking planned and reactive project work
- Maintaining an effective AMS and AMP

1.3 LEGAL FRAMEWORK

Whilst the plan is intended to comply with all aspects of the requirements of CAR and other relevant legislation, the following duties within CAR are expressly highlighted as being fundamental to the success of the University’s effective asbestos management system, that underpin this Plan:

Regulation 4 requires Duty Holders to:

- Find ACMs and check their condition
- Presume that materials contain asbestos unless there is strong evidence to suppose they do not
- Keep an up-to-date written record of the location and condition of ACMs
- Assess the risk of anyone being exposed to these materials
- Prepare and put into effect a management plan to manage the risk and keep ACMs in a good state of repair, or ensure that it is repaired or if necessary removed
- Provide information on the location and condition of the material to anyone potentially at risk.

Regulation 5 - Identification of the presence of asbestos states:

- An employer shall not undertake work in demolition, maintenance, or any other work which exposes or is liable to expose his employees to asbestos unless either:
- They have carried out a suitable and sufficient assessment as to whether asbestos is likely to be present
- If there is doubt, assumes that asbestos is present
Regulation 11 requires employers to:

- Ensure that adequate information, instruction and training is given to employees who are liable to disturb asbestos while carrying out their normal everyday work, or who may influence how work is carried out.

1.4 SCOPE OF BUILDINGS

There are currently over 200 buildings within the University estate; these are a mixture of freehold, leasehold and informal occupation arrangements with 3rd parties.

Where the University owns/controls or maintains the building fabric and engineering services, the University is the duty holder for ensuring compliance with the CAR.

Those buildings currently outside the scope for University as the Duty Holder is those buildings for which the University Estates are not maintaining include:

- NHS Trust Buildings
- Leasehold/tenanted buildings where the University are not the Duty Holder and do not have maintenance or repair obligations for the building fabric or building engineering services/infrastructure under the lease agreement.

As the University has members of staff, students and contractors using these buildings there is a duty of care to ensure that the duty holder in those buildings has an adequate process in place for complying with the CAR and any ACM information is available for review by the University.

A comprehensive list of buildings where the University is the Duty Holder and which are third party Duty Holders can obtained from the Estates Property Team.
2.0 ROLES & RESPONSIBILITIES

2.1 Management Structure Chart

The Duty Holder is the person or organisation that has clear responsibility for the maintenance or repair of non-domestic premises through an explicit agreement such as a tenancy agreement or contract.

**Management Responsibilities**

- Denotes a Requirement for the Role Holder to be technically and managerially competent to undertake asbestos management
- Information
- Governance & Management
- Technical Management
- F&I Responsibilities

**Role Holders**

- UCL Council
- President & Provost
  - Duty Holder
- Health & Safety Committee
  - Chair
  - Vice Provost (Operations)
- Director of UCL Estates
- Director of F&I

**Stakeholders**

- **Competent Person**
  - Operation & Maintenance Providers
  - University Operation and Maintenance Staff & Contractors
  - The Competent Person has the necessary knowledge, training, experience and abilities to carry out the Operational & Maintenance tasks

- **Competent Person**
  - Consultants Designers & / or Installers
  - University Staff & Framework Consultants/Specialist
    - (Including Capital Projects Consultants & Contractors)
    - The Competent Person has the necessary knowledge, training, experience and abilities to carry out the Design and / or Installation

**UCL Estates**

- Fabric & Asset Management Team Leader
- Head of Engineering Governance
- Responsible Person
  - Asbestos Manager & Framework Asbestos Consultant

**Governance**

- Review
- Operation
- Change
2.2 Interactions Chart

The structure below outlines the interactions between the asbestos management systems and the various stakeholders in the organisation.

[Diagram showing interactions between stakeholders]

This includes:
- UCL Project Officers
- UCL Framework consultants
- UCL Facilities Managers
- UCL Building Managers
- UCL Supervisors of Operations
- UCL Supervisors of Maintenance
- UCL Maintenance and Operation Staff
2.3 All Employees & Contractors

All employees and contractors to the University have a duty to co-operate with the Duty Holder; as well the specific roles outlined below and will;

- Make every effort to avoid disturbing or damaging any ACMs.
- Report to the Asbestos Manager/Safety Services if they suspect that ACMs or materials suspected of containing ACMs has become disturbed and/or damaged, or is likely to become disturbed or damaged.
- Notify Estates of any intended work which may interfere with the fabric of any University premises of the University by completing the permits authorising such works.
- Ensuring that the proposed work does not start until a permit to work/authorisation has been received and approved by University project officers, in consultation with the Asbestos Manager.
- Complying with all aspects of this AMP.
- Attend health and safety training specified by Safety Services and Asbestos Manager.
- Disseminate information about asbestos to staff and contractors they are responsible for, by reviewing the AMS database and obtaining information from the Asbestos Manager/Framework Asbestos Consultant.
- Report any suspected asbestos materials or damage to the asbestos containing materials to the University’s Asbestos Manager (Appointed Person) by calling Customer Services 30000.

2.4 UCL Council – Duty Holder

UCL Council, as the employer, has the ultimate responsibility for health and safety and is the duty holder for University.

UCL Council has delegated the duty of the day-to-day running of the University, which includes the management of health and safety, to the President and Provost.

2.5 President and Provost

The President and Provost are responsible to UCL Council for the day-to-day running of the University in all of its activities, including the management of asbestos.

The President and Provost have constituted the Health & Safety Committee (HSC) to plan and implement policy for health and safety and the executive arrangements therein, which includes the management of asbestos policy.

2.6 Health and Safety Committee (HSC)

The HSC is responsible to the President and Provost for the planning, consultation and dissemination of the arrangements made within the Asbestos Management Plan.
2.7 Director of Estates

The Director of Estates has overall responsibility for the strategy and budget allocation (within the limits of the approved budget) of financial and other resources for the control of ACM’s at the University.

- Ensuring that adequate resources are provided and allocated to enable compliance with this Asbestos Management Plan.
- The safe management and operation of Estates activities, including consideration of asbestos issues and compliance with the AMP, within the operational and investment under the University’s Estates control.
- Devolving the principal functions and strategy of asbestos management to the Director of Facilities & Infrastructure.
- Ensuring that Estates staff has suitable induction, asbestos awareness and refresher training with respect to asbestos issues to comply with legislation and to ensure a high level of asbestos awareness.

The Director of UCL Estates through the Director of Facilities and Infrastructure shall ensure appropriate resources and expertise is in place for asbestos management in accordance with the University's Asbestos Policy.

2.8 Director of Facilities & Infrastructure

The Director of Facilities and Infrastructure through the Head of Engineering shall ensure appropriate resources and expertise is in place for the management of asbestos in accordance with the Asbestos Policy and maintaining an effective Asbestos Management Plan (AMP).

- Responsibility for managing and implementing the strategy for resources and finance (within the limits of the approved budget) for the control of ACM’s at the University.

2.9 Head of Engineering

The Head of Engineering through the Fabric and Asset Management Team Leader shall ensure appropriate resources and expertise is in place for day-to-day management of the AMP.

- Ensures that the implemented AMP is monitored so that working arrangements and provision of financial, technical, human and other resources are suitable and sufficient to meet its requirements.
- Commissions an annual report for the University Directorate where applicable.
- Reports to the various University committees on the management of safety in the estate with special regard to ACMs.
- Attend the yearly AMP review meetings.
2.10 Fabric and Asset Manager Team Leader

The Head of Engineering Infrastructure through the Fabric and Asset Manager Team Leader shall ensure appropriate resources and expertise is in place for day-to-day management of the AMP.

- Appoints, in writing, a competent Asbestos Manager “Appointed Person (Asbestos)” responsible for the day-to-day management of the University’s Asbestos Management Plan and compliance with current regulations, University policy, processes and procedures to undertake all estate activities inclusive of projects, operations and maintenance.

- Sustaining an effective AMP.

- Manage the Asbestos Manager as the competent person for the day-to-day management of ACM and ensures that those staff that manage or supervise projects and activities that could disturb ACM are aware of their responsibilities under this plan and competent to undertake the work.

- Ensures that the Asbestos Manager is aware of their roles and responsibilities and that they are competent to carry them out.

- In consultation with the Asbestos Manager appoint other resources to manage the day to day management of asbestos. These will include:
  - Asbestos Consultant (Framework under NEC3 Professional Services Contract)
  - Licenced Asbestos Removal Contractors (Framework under NEC3 Engineering and Construction Contract)

2.11 Asbestos Manager “Appointed Person (Asbestos)”

The Asbestos Manager has responsibility for the day-to-day management of ACM’s in all University buildings, and sites inclusive of building fabric, engineering systems and furniture and equipment, its control as the Duty Holder.

Responsibilities shall include:

General ACM Management

- Maintaining a sustainable asbestos management plan and an up to date asbestos management register (referred to as the Asbestos Management System – AMS)

In conjunction with the embedded Framework Asbestos Consultant:

- Providing competent professional advice on ACMs and their treatment to those with responsibilities under this Plan
- Ensuring that statutory management surveys and re-inspections of ACMs are undertaken and recorded to the AMS to reflect the current condition of ACMs
- In conjunction with university Project Officers and Framework Consultants/Contractors programming surveys in University premises to identify any ACMs that may be present which effect their projects or activities.
Maintaining the asbestos register for all University premises
- Ensuring that all records of ACMs include a Material Risk Assessment in accordance with HSG 227 ‘A Comprehensive Guide to Managing Asbestos in Premises’
- Ensuring all works comply with Managing and Working with Asbestos. Approved Code of Practice HSG L143
- Reviewing and updating the AMP
- Ensuring that all asbestos identified as being safe to leave undisturbed is adequately labelled. (NB this does not mean that all ACMs will be labelled).
- Reporting any incident of alleged asbestos exposure to the Asbestos Manager/Safety Services and assisting with or undertaking any investigation
- Assisting the Head of Health and Safety Services in liaison with the HSE
- Promoting awareness of hazards of ACMs and the AMP by advising on, and providing, appropriate training and induction, to University staff as required and in particular to those whose work might bring them into contact with ACMs
- Monitoring to ensure that all University Project Officers/Building Managers and staff are aware of their responsibilities under this AMP
- Attending in accordance with the Emergency Action Plan: Accidental Release of Asbestos and taking such actions as are required to ensure safety
- Maintaining his/her professional competence, including a thorough understanding of all relevant legislation, codes of practice, guidance and good practice
- Organising and chairing asbestos management meeting (monthly)
- Managing Asbestos Consultant and Licenced Asbestos Removal Contractors under the framework agreement.

Reactive ACM management – Operation and Maintenance
- Providing information on ACMs as required
- Attending site and providing guidance to maintenance staff on remedial actions or precautions to be taken in respect of ACMs
- Where appropriate, instructing sampling and investigation of any suspected materials, in accordance with prescribed procedures,
- Instructing analysis by Framework Asbestos Consultant with the appropriate UKAS accreditation
- Instructing/advising appropriate asbestos abatement action to facilitate maintenance tasks

Planned ACM Management - Project and Estates Management
- Providing information on existing ACMs as required
- Reviewing project brief and providing guidance on abatement actions or precautions to be taken in respect of ACMs.
- Where intrusive work is planned, advise appropriate actions required by the University staff
- Promoting appropriate asbestos abatement actions to facilitate project work in conjunction with the Framework Asbestos Consultants and University Project Officers/Framework Consultants
- Ensuring that the AMS is updated following completion of any works on ACMs including providing the relevant Project Manager with details of residual asbestos hazards remaining in the vicinity of any proposed work.
Financial Administration

- Assisting the Procurement Department to ensure that only competent and UKAS accredited Asbestos Consultants are employed to provide services in conjunction with managing asbestos.
- Assisting the Procurement Department to ensure that only competent and Licensed Asbestos Removal Contractors are engaged to carry out work with ACMs.
- Managing any budgets relative to statutory and compliance changes driven by legislation.
- Providing budgetary cost estimates for asbestos work to other departments for non-project related activities i.e. general operation and maintenance activities.
- In conjunction with the Framework Asbestos Consultant assisting University staff with the tendering asbestos.
- Providing advice to University Project Officer’s/Project Teams on commissioning of asbestos consultancy/project management services within their projects and in accordance with the Framework.

Audits

- Ensure the AMS is updated following completion of any works on ACMs including providing the relevant Project Manager with details of residual asbestos hazards remaining in the vicinity of any proposed work.
- Audit the AMS to ensure it is up to date (no more than one month old).
- Audit to ensure the Framework Asbestos Consultant reviews the Framework Licensed Asbestos Contractor’s plan of works is adequate.
- In conjunction with the Asbestos Consultant assessing the appropriate level of analytical support and attendance required.
- In conjunction with the Framework Asbestos Consultant and University Project Officers inform appropriate staff of asbestos related works in good time.
- Audit to ensure method statement and risk assessments amendments are assessed by the Framework Asbestos Consultant.
- Audit to ensure site works comply with relevant University requirements, either directly or with the Framework Asbestos Consultants when they are commissioned to project manage surveys/removal works.
- In conjunction with the Framework Asbestos Consultant manage Framework Licensed Asbestos Removal Contractors to assess their compliance with statutory and University requirements.
- Stopping work where a Framework Licensed Asbestos Removal Contractor does not perform to the required health and safety standards, or where his actions appear likely to result in a breach of health and safety.
- Undertake all financial audits as required within the Asbestos Frameworks.

2.12 Framework Asbestos Consultant

A detailed specification for the Framework Asbestos Consultant duties is contained in the Framework Agreement. (copies may be obtained from the Asbestos Manager on request).

The scope of the service covers the following activities at any of the University
sites:

- Taking and analysing bulk samples as directed.
- Undertake Statutory Re-inspection Surveys.
- Undertake Management Surveys.
- Undertake Refurbishment/Demolition Surveys.
- General Consultancy Services.
- Consultancy: Pre-construction support.
- Consultancy: Procurement support.
- Consultancy: Monitoring works and analysis.
- Project Management: Asbestos abatement works.
- Assist the Asbestos Manager in the monitoring and management of Licensed Asbestos Removal Contractors under the framework agreement.
- The Asbestos Consultant is also responsible for maintaining the current version of the University’s Asbestos Management System (AMS) and Register and managing all uploads to ensure the data contained within the AMS is no more than a month old.
- Attend monthly asbestos management meetings.

2.13 Framework Licensed Asbestos Removal Contractor

A detailed specification for the Framework Licensed Asbestos Removal Contractors duties is contained in the Framework Agreement. (copies may be obtained from the Asbestos Manager on request).

The scope of the service covers the following activities at any of the University sites:

- Unlicensed work.
- Asbestos Removal.
- Hazardous Remediation.
- Asbestos Encapsulation and Treatment.
- Asbestos Repairs.
- Decontamination Services.
- Emergency (out of hours) response.
- Disposal of asbestos waste.
- Building, validating, maintaining, decontaminating and removing full enclosures (including air locks and pumps) and to be in attendance when asbestos surveyors have to break through ACM during the conduct of a survey.
- All associated analytical work will be performed by the Asbestos Consultant.
- In the event of an emergency, the Licensed Removal Contractor must be
able to attend within 120 minutes at any time of the day or week.

- Ensure all operatives have a valid contractors pass.
- Works to be conducted in compliance with best practice & statutory requirements:
  - Control of Asbestos Regulations
  - The Hazardous Waste Regulations.
  - HSG 247 – Licensed Contractors Guide.
  - HSG 210 - Asbestos Essentials.
  - HSG 143 - Managing and Working with Asbestos. Approved Code of Practice
  - Approved Code of Practice: Work with Asbestos Insulation, Asbestos Coating and Asbestos Insulating Board L28.
  - Construction (Design & Management) Regulations.
  - Other Health & Safety at Work Regulations.
  - University Contractors CDM Form.
  - ARCA guidance.
  - All University policies, standards and procedures.

- Develop a plan of work that complies with the documents listed above
- Makes explicit reference to public protection measures in all plans of work.
- Site set up plans must be included in the plan of work, to explain the overall management of the project.
- Notify the HSE (where notification of required).
- Manage and supervise operative’s performance.
- Co-operate with the Asbestos Consultant in the planning of the works and during the subsequent monitoring of site activities.
- Do not commence works on asbestos until the Asbestos Consultant/Estates have issued all relevant permits and approvals.
- When undertaking abatement works as enabling works prior to the main construct project or the abatement works are in the major constituent of the project and is notifiable under CDM 2015, the Framework Licensed Asbestos Removal Contractor shall undertake Principal Contractor duties.
- Ensure waste is stored securely.
- Ensure waste transfer notes are provided and included with the end-of-project documentation. These documents must be legible and compliant.
Provision of any other information/documentation requested by the Asbestos Consultant to enable them to perform their duties on behalf of University.

Co-operate, free of charge, with an annual audit to verify your competency.

Perform health monitoring of operatives as required by legislation.

Medical records are to be made available for inspection by University or their Asbestos Consultant.

Apart from the waste disposal, no element of this work may be subcontracted without the express permission of the Asbestos Manager.

Notify the Asbestos/Manager Asbestos Consultant of any alterations, renewals or revocations to your licences to work with or supervise work with asbestos.

Maintain records of all work carried out at the University for the duration of the contract.

Ensure all operatives working at the University have standard CRB checks.

Procedure Manuals to be made available to Asbestos Manager/Asbestos Consultant during the annual audit and to be provided if any significant changes are made to it.

Attend regular management/review meetings and abide by the requirement of the Licenced Asbestos Removal Contractors Framework.

2.14 Contractors (and staff appointing contractors)

Those who employ Contractors to undertake project work or operation and maintenance activities in the University shall:

- Be responsible for ensuring the work complies with the requirements of this standard and that the works comply with relevant statutory regulations.

- Be responsible for undertaking reasonable enquiries to confirm the competency and training of contractors in the area of work, before entering into contracts for the removal, treatment, and cleaning of the asbestos, and all other aspects of removal works.

Contractors are to be made fully aware of the duties and responsibilities assigned to them, and are to be familiar with the University standards and procedures.

Only Approved/Frameworks Contractors are permitted to work on University sites.

Contractors are to have completed the necessary University safety inductions and safety questionnaires and that their responses have been assessed:

Contractors are to comply with the University Safety Policy ‘Safety Rules for Contractors employed on University premises’, and sign the document accordingly. This includes:
• Comply with University policy, procedures and processes regarding the removal and management of asbestos.

• Ensuring that any employees undertaking work on University properties have received asbestos awareness training in accordance with CAR

• Ensuring that any employees undertaking work on University properties have been made aware of the University Site Rules and Guidance

• Disseminating information on known ACMs to those undertaking the work

• Not undertaking any work which may disturb known or suspected ACMs

• Notifying the Asbestos Manager/Framework Asbestos Consultant immediately and stopping work if they encounter damaged or disturbed known or suspected ACMs

• Complying with all aspects of this Asbestos Management Plan

• Ensure that all sub-contractors are informed of relevant procedures; in particular the location of ACMs within the project area

• Co-operate with the University’s Safety Services, Asbestos Manager and Framework Asbestos Consultant and any asbestos contractors or associated contractors working within or adjacent to the known or intended project area

• Ensure the University emergency asbestos procedures are followed in the event of discovery of or damage to ACM

2.15 UCL Heads of Departments, Schools and Facility/Building Managers

University Heads of Departments, Schools and Facility/Building Managers shall;

• Co-operate with Asbestos Manager in their management of asbestos (e.g. making reasonable provision for surveyors to undertake their surveys, or relocating staff where required for the duration of remediation works).

• Ensure that when faculty/departmental staff generate works requests, that they communicate any known hazard information for the area. This may include presence of harmful substances (the works request system enables asbestos information to be readily obtained).

• Ensure that the activities of their faculties and services do not risk asbestos exposure – i.e. their staff or contractors do not work on the building’s structure, fabric or building engineering services unless authorised by the Estates through the Permit to Work System.

• Ensure any Contractors engaged by the faculty or department hold a valid estates permit to works and authorised by the appropriate University Project Officer’s/Project Teams.

• All contractors who are working on or are liable to disturb the fabric or structure of a building or installed services must have adequate and up to date asbestos awareness training, in accordance with CAR (please note minimum standards for training are discussed later).
- Ensure equipment or apparatus erected, installed, purchased or gifted on behalf of the department is free of asbestos material.
- Where asbestos is known or suspected to be present and could be at risk of disturbance from faculty operations, seek advice from the Asbestos Manager/Framework Asbestos Consultants/Safety Services.
- Arrange for any construction and refurbishment work required within departmental premises to be carried out with the co-operation and permission of the Estates so that the management of ACM is considered at the planning stage;
  - Notify the Asbestos Manager to arrange the removal or containment of known ACM within departmental equipment;
  - Ensure departmental project managers or supervisors or activities that may disturb ACM are aware of their responsibilities under this plan and have attended an asbestos awareness course.

2.16 UCL Estates (Projects, Project Manager’s & Project Officers)

University Project Officers, Project Managers and the Consultants/Contractors they appoint are responsible for ensuring systems are designed and installed in compliance with this and document, and the University policy and standard operating procedures.

General refurbishment and maintenance works include amongst other activities;

- New construction, refurbishment, maintenance and engineering projects;
- Security systems, information technology (IT) systems, and telecommunications works.
- General planned and reactive maintenance / repair works.
- General business as usual operations – (hard and soft facilities management)

Any members of staff responsible for people involved in construction, refurbishment, operation and maintenance work that may disturb ACM’s within the fabric of a University building, whether carried out by University staff or an external contractor must;

- Consult with Asbestos Manager/Framework Asbestos Consultant before commencement of such works which disturb the fabric or building engineering services of a University building.
- Obtain information from the AMS about the location, type and risk level of ACM present in the project work area.
- Where necessary seek the advice of the Asbestos Manager about ACM’s within the area of their project.
- Contact the Asbestos Manager to arrange for a refurbishment or demolition survey to be carried out where the work is likely to be intrusive and may disturb ACM not identified by a management survey.
- Allow and scope sufficient time and resources for asbestos management and abatement works to be financed and programmed for their
project/activity, and in accordance with the University’s project lifecycle stages

- Make arrangements for the removal or containment of the ACM so as to prevent the exposure to asbestos of those working on the project.

- Inform all staff and contractors involved in the project of the location and condition of any ACM that may be affected by the project.

- Advise all staff and contractors involved in the project of the actions to be taken if suspect ACM is discovered.

- Inform the Asbestos Manager/Safety Services of any suspect material reported to them and ensure that work is halted until the suspect material is investigated by Estates and relevant parties.

2.17 UCL Facilities and Infrastructure Operation and Maintenance Personnel

The University’s Facility’s Operation and Maintenance personnel are responsible for:

- Day to day reactive and operational activities across the estate, termed business as usual activities.

- Checking the AMS and carrying out risk assessments before undertaking a (Appointed Person) any work in properties.

- Notifying the Asbestos Manager/Safety Services immediately and stopping work if they encounter damaged or disturbed known or suspected ACMs.

2.18 UCL Safety Services

The University’s Safety Services are responsible for:

- Periodically auditing compliance with this AMP

- In conjunction with the Asbestos Manager investigating and reporting to the University Health and Safety Committee on any alleged incident of accidental asbestos exposure and for ensuring reporting of incidents under RIDDOR, where appropriate

- Notification to the Occupational Health Service should any member of staff be involved in an incident of accidental asbestos exposure in order that occupational health advice can be given if required

2.19 UCL Estates - Property Services Team

The University Estates Property Services shall;

- As far as reasonably practicable confirm that properties purchased on behalf of the University are either free of ACM (normally an asbestos register) or that there is no information about the presence of ACM.
• Obtain adequate information about the presence of ACM. If this is not available a survey must, as far as possible, be carried out prior to exchange of contracts, if timescales do not permit, a preliminary assessment of risk and cost must be carried out based on visual inspection, the age of the property and such other relevant information as is available.

• Wherever reasonably practicable any known ACM must be removed from properties newly purchased on behalf of the University. Members of the Property Management Team must keep the Appointed Person informed about ACM issues involved in the properties they are dealing with.

• Provide asbestos survey / register information to the Asbestos Manager for all new property acquisitions, leasehold (long or short term) and freehold, and confirms who is the duty holder, i.e. landlord or University, as well define building fabric and engineering services ownership and responsibilities.

• For any UCL property, request the current asbestos management register from Asbestos Manager for inclusion in the University’s property disposal transactions.

2.20 UCL Estates – Property CAD Manager

The Property CAD Manager, or his nominated person, shall;

• Notify the Asbestos Manager each time the buildings register (FAMIS) is amended to reflect a new property acquisition or disposal by Property.

• Notify the Asbestos Manager each time a property is modified, re-modelled or refurbished.

• Provide quarterly updates of all new/modified building plans within the estate, in CAD format, to the Asbestos Manager. These plans shall be issued to the Framework Asbestos Consultants at the asbestos management meeting for updating onto the University’s AMS.

2.21 UCL Occupational Health

The University’s Safety Services are responsible for:

• Providing occupational health advice to management and staff on issues relating to asbestos

• Ensuring that any exposure is recorded on the employee’s medical notes and retaining the medical notes for a period of forty years after the date of final exposure

3.0 ASBESTOS MANAGEMENT AT UCL

3.1 Introduction

The following section details how the University meets its duties under the CAR.

Asbestos is the term used for the fibrous forms of several naturally occurring minerals. The three main types of asbestos are:
Asbestos had been the subject of gradual voluntary and statutory bans since 1969 and by 1999 the importation, supply and use of all forms of asbestos had been banned in the UK.

Asbestos fibres can be found in the atmosphere in Great Britain, therefore the general public is exposed to very low levels of fibres. However, a key factor in the risk of developing an asbestos-related disease is the total number of fibres breathed in. Working on or near damaged asbestos-containing materials or breathing in high levels of asbestos fibres, which may be many hundreds of times that of environmental levels could increase the chances of getting an asbestos-related disease.

There are four main diseases/conditions caused by asbestos;

- mesothelioma
- lung cancer
- asbestosis
- diffuse pleural thickening

If ACM's are kept in good condition and left undisturbed, fibres will not get into the air where they can be breathed in; therefore the presence of asbestos containing material does not in itself constitute a danger, however it is hazardous when disturbed or damaged and must be correctly managed.

### 3.2 Identification of Asbestos Containing Materials

In order to manage the risk from asbestos the University shall ensure that a suitable and sufficient assessment is carried out as to whether asbestos is or is not likely to be present in University buildings. This requirement is valid for any property built before 1999.

**Strategy:**

The use of asbestos in UK buildings has been progressively prohibited until a complete ban of all use in construction in 1999. Some products containing chrysotile were still available after 1989 although generally in a form that would present a low risk of releasing fibres if damaged. It is the University's policy to undertake appropriate surveys and risk assessments for all properties built prior to 2000.

Information from all surveys, inspections, bulk analysis etc. is held on the AMS.

### 3.3 Asbestos Surveys

Where a property was built before 2000 it must be presumed that ACM's are present unless the asbestos survey confirms otherwise.

Where a property was built post 2000 then it is assumed that there is no asbestos containing materials within the building. Note - This depends on the whole of the...
building being built post 2000. Checks should be made if there are any areas built pre-2000 before making this assumption.

All surveys undertaken at the University shall be carried out by licensed and UKAS accredited Asbestos Consultants only.

All surveys and re-inspections must be carried out to standards set by HSE 264 Asbestos: The Survey Guide.

a) Management surveys (Initial survey to form the Asbestos Management Register)

This is the survey required for all building constructed pre 2000, its purpose is to locate, as far as reasonably practicable, the presence and extent of any suspect ACM’s in the building which could be damaged or disturbed during normal occupancy and operations including foreseeable maintenance and installation.

The Management Survey is the initial survey created when forming the asbestos management register for the building.

The University takes reasonable steps to establish if there are materials containing asbestos in its buildings by undertaking asbestos management survey’s (previously referred to as Type 2 Surveys) of those buildings where the University is the duty holder.

The purpose of the survey is to identify the location of ACM’s, the amount, what condition it is in and to conduct a risk assessment, evaluating the likelihood of asbestos release & the likelihood of human exposure. The risk assessment forms the basis of the Asbestos Management Plan.

The Asbestos Manager shall be responsible for commissioning all management surveys. The standard to be adopted is described in HSG 264 Asbestos – The Survey Guide.

The Framework Asbestos Consultants shall inspect materials within a building and will generally take samples of suspect ACMs in order to determine if they do or do not contain asbestos. In certain circumstance (i.e. no physical access) and only when all other means are exhausted, they may presume material to be ACM – but this is not University’s preference when surveys are being conducted.

Surveyors must also determine the condition and surface treatment of the material and the potential for exposure based on its location and activities liable to disturb it (using HSG 264 and 227 algorithms).

Where an area has not been surveyed, ACMs must be presumed to be present if the building was constructed before 2000. However, HSG 264 emphasises the need to access as much of a building as far as is reasonably practicable, which will involve careful planning with building occupiers.

The information from all Management Surveys shall be held on the AMS.

b) Refurbishment or Demolition Survey

This survey is needed before any refurbishment or demolition work is carried out. This type of survey is used to locate and describe, as far as
reasonably practicable, all ACMs in the area where the refurbishment or demolition work will take place.

Refurbishment or demolition surveys (previously referred to as Type 3) must be undertaken prior to demolition works or refurbishment works that are likely to penetrate the fabric of a building or services.

This type of survey is used to locate and describe, as far as reasonably practicable, all ACMs in the area where the refurbishment work will take place or in the whole building if demolition is planned.

The survey will be fully intrusive and involve destructive inspection, as necessary, to gain access to all areas, including those that may be difficult to reach.

A refurbishment or demolition survey 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 Asbestos Manager/University Project Officer's/Project Team’s shall be responsible for commissioning all surveys. The standard to be adopted for refurbishment and demolition surveys is described in HSG 264 Asbestos – The Survey Guide.

Surveyors will locate and describe, as far as reasonably practicable, all ACMs in the building and may involve destructive (intrusive) inspection.

A full sampling programme is undertaken to identify possible ACMs and an estimate of the volume and surface area of ACMs made.

The survey is designed to be used as a basis for tendering the removal of ACMs from the building prior to demolition or major refurbishment or to assist the management of the project to prevent damage to ACM.

The University requires that the same risk assessment algorithms are used to rate these ACM.

For a refurbishment or demolition survey to progress the area must be unoccupied and fully accessible to the surveyor, with furnishings and equipment removed as necessary.

Areas/rooms should not be occupied while an R&D survey is underway. R&D surveys must be followed by a reassurance air test if they have revealed any ACM.

The information from all Refurbishment or Demolition Surveys is held on the University's AMS.

The University's AMS shall also facilitate storage of previous R&D survey data strictly for management purposes to allow the Asbestos Consultant to:

- Undertake desk top studies during pre-construction project planning stages to assist with project scoping/budgeting/programmes for abatement works.
- Demonstrate value for money when requested for a R&D survey by the Asbestos Manager/University Project Officers and Framework Consultants.
4.0 ASBESTOS MANAGEMENT SYSTEM (AMS)

4.1 Application and Use

It is important for University staff and other stakeholders, involved in estate activities which may disturb asbestos, to know which of the surveys is applied for their activities. This applies directly, such as activities undertaken by operatives e.g. maintenance, operations, construction work, etc. or indirectly, such as activities undertaken by project managers, designers, supervisors etc. Guidance is summarised below:

Asbestos Manager System (Register) - AMS – This is the live register which records data on asbestos containing materials and their condition for each of the buildings on the estate. The register is updated following statutory management survey and then subsequent re-inspections, bulk sampling and R&D Surveys inclusive of any subsequent abatement works and final ACM status (i.e. removed, encapsulated or left undisturbed and managed via re-inspections).

The AMS, also known as the asbestos register, shall be utilised by:

- Operation and maintenance personnel for carrying out risk assessments prior to undertaking non-intrusive works.
- Operation and maintenance personnel for carrying out risk assessments and instigating bulk sampling prior to undertaking business as usual and minor works with an intrusive nature e.g. installing new light switch, repairing windows and doors, access to services behind partitions and ceilings, replacing leaking radiator, installation of IT and security devices and equipment etc.
- University Project Officers and Framework Consultants, in conjunction with the Asbestos Manager/Asbestos Consultant to evaluate and determine the effects of ACM’s at the early stages (pre-construction) of their projects.
- Asbestos Manager for managerial data, financial, audit, training and performance related activities.

The register comprises the following data:

Management Surveys – Required for all buildings suspected of ACM’s and form the initial survey which forms the buildings asbestos management register. This is updated and maintained throughout the life of the building following re-inspections and subsequent abatement or asbestos abatement works emanating from refurbishment or demolition works.

Statutory Re-Inspections – Are planned and required for all buildings suspected of ACM’s and undertaken on an annual basis or frequency in accordance with CAR 2012. The findings from these inspections and any subsequent abatement actions shall be incorporated onto the AMS within 20 working days (one month).

Bulk Samples – Are reactive and required for all buildings suspected of ACM’s and prior to undertaking business as usual and minor works of an intrusive nature. The findings from these analysis and any subsequent abatement actions shall be incorporated onto the AMS within 20 working days (one month).

R&D Surveys – Required for all buildings suspected of ACM’s and are required for projects of an intrusive nature. The AMS shall contain all new and historical R&D Survey data to assist the Asbestos Manager/Consultant in their duties. The findings from these surveys and any subsequent abatement actions shall be incorporated onto the AMS within 20 working days (one month or as agreed with the Asbestos Manager)
4.2 AMS (Live Register) ACM Data Input, Retrieval and Viewing

Asbestos Management System (AMS)
(Available for each University Building Managed by Framework Asbestos Consultants)

Remote Server

AMS Internet Viewing Platform

Annual Re-Inspections
(Statutory Compliance)

Bulk Sampling
(Operation, Maintenance & Minor Projects)

R&D Surveys
(Small, Medium & Large Projects)

Asbestos Manager
(AP)

Request/Brief for Bulk Samples or R&D Surveys

Operation & Maintenance Activities
University Maintenance Staff or Contractor
(Including Facilities & Framework Contractors for Soft and Hard Services)

The Competent Person has the necessary knowledge, training, experience, abilities to carry out the control measures &

Project Activities
University Staff, Consultant or Contractor
(Including Capital Projects Framework Consultants & Contractors)

The Competent Person has the necessary knowledge, training, experience and abilities to carry out the Design and / or Installation

When AMS (Register) is inadequate Bulk Samples or R&D Survey shall be required
5.0 PROJECTS

5.1 Minor Intrusive Works

Where the University is to undertake general planned and reactive activities associated with operating and maintaining buildings within the estate, a suitable and sufficient assessment as to whether asbestos is likely to be present and disturbed during the activity must be made. A management survey is likely to provide sufficient information to satisfy this requirement particularly where the degree of intrusive works is minimal.

Examples of minor intrusive works -

- Business as usual activities – operation and maintenance of engineering services, repairing leaks, servicing plant and equipment, etc.
- Soft facility activities – cleaning, waste removal, etc.

Risk assessments shall be undertaken by the operatives undertaking the activity and in conjunction with the buildings asbestos management plan which is held in the University’s AMS.

Access to the AMS has been made available to all university estates staff and selected Framework Consultants and Contractors via the University’s intranet system.

Where deemed appropriate by the Asbestos Manager or the Framework Asbestos Consultant, additional site inspections may be required to enable a suitable and sufficient assessment to be made. This may include taking additional samples know as bulk samples. Any such work will be undertaken in accordance with HSG264 and samples submitted for analysis to a consultant accredited by the United Kingdom Accreditation Service (UKAS) as complying with ISO17025 for the analysis of bulk samples to establish the presence and type of asbestos.

The Asbestos Manager/Framework Asbestos Consultant are the sole authority for undertaking such assessments. If in any doubt a refurbishment survey must be commissioned.

5.2 Major Intrusive Works

Where the University is to undertake work in demolition, refurbishment or maintenance, it must undertake a suitable and sufficient assessment as to whether asbestos is likely to be present. A management survey is unlikely to provide sufficient information to satisfy this requirement particularly where intrusive works are planned. An Asbestos Refurbishment or Demolition Survey must be undertaken.

Intrusive work includes all demolition or breaking out, forming openings (of any size) in walls, floors and ceilings, opening up of ducts, boxing or voids, lifting of coverings etc.

Examples of major intrusive works applied to estates activities are detailed below-

- Capital projects e.g. - remodelling floors and buildings, new laboratories, teaching space upgrades, office refurbishments etc.
• Strategic maintenance projects e.g. - engineering plant and equipment replacements, electrical rewiring, upgrade of controls and switch gear, fire alarm improvements etc.

• Security system upgrades and improvements ice e.g. – door access systems, CCTV installations, etc.

• IT (information technology) upgrades and improvements e.g. – new data points, it cabling, telecommunications wiring etc.

During these activities asbestos risk evaluations shall be undertaken by the University Project Officer and their appointed Project Teams in conjunction with the Framework Asbestos Consultant, who shall be appointed as part of the project delivery team at the early stages of the project lifecycle (see diagram overleaf for interactions and duties/deliverables for Framework Asbestos Consultant within the UCL Project Life Cycle Processes).

Initially during the early stages of the project e.g. feasibility stage feasibility the asbestos risk assessment must be undertaken with the Asbestos Manager/Framework Asbestos Consultant and in conjunction with the buildings asbestos management register which is held in the AMS.

Access to the ARMS has been made available to all University staff and selected framework consultants and contractors via the University’s intranet system.

Where any intrusive work is planned in a building constructed before 2000 the Asbestos Manager/Framework Asbestos Consultant shall be consulted.

The Asbestos Manager/Framework Asbestos Consultant shall assess the quality and extent of existing information and decide whether it is suitable and sufficient to permit the proposed work to proceed. Where it is not sufficient, he will instigate further survey work.

5.4 Premises Where UCL Are Not the Duty Holder

The Asbestos Manager will monitor that where the University is not the duty holder that the building duty holder has arranged for the identification and monitoring of ACM, including asbestos surveys, the compilation of an asbestos register and annual re-inspections of known ACM.

The AMS data base shall clearly differentiate buildings where the University are the duty holder and where a third party is responsible and how to obtain the Asbestos Management Register.
UCL Project Lifecycles
Overview of Asbestos Consultancy Applications and Deliverables
for Small, Medium and Large projects

Gate 1  Gate 2  Gate 3  Gate 4  Gate 5  Gate 6  Gate 7

UCL

Need
Initiation
Development
Procurement, Planning and Budgeting
Implemented
Operations
Post Project

RiBA
RiBA 2007
RiBA 2013
GC
Works

Stage 1
Stage 2
Stage 3
Stage 4
Stage 5

Asbestos Manager or Asbestos Consultant (optional)
Asbestos : Consultant, Surveyor,
Asbestos : Consultant, Surveyor,
Asbestos : Consultant, Surveyor,
Asbestos : Consultant, Surveyor

Resource

Deliverables

Scope / Design / Tender
Tender / Enabling Works
Main Contract Works

Budget Cost
Programme
Scope of works
Review
Management
Register AMS
Desk Top Study

Recommended Asbestos Resources Levels and Deliverables

Asbestos Management
Owner: Head of Engineering
Authorised: Director of Estates
Uncontrolled when printed
6.0 **ASBESTOS CONTAINING MATERIALS (ACM) DATA MANAGEMENT**

6.1 **Introduction**

The University is required to provide, and keep up-to-date, a record of the location and condition of the asbestos containing materials - or materials which are presumed to contain asbestos via a robust Asbestos Management Register (referred to as the AMS in this document).

The AMS is maintained by Asbestos Manager in conjunction with the Framework Asbestos Consultant and supplemented with additional information gained during monitoring, investigation or annual re-inspection, and kept up to date to reflect the gradual removal of ACM’s from University premises.

The Asbestos Management System is a computerised database system and is fully accessible to all staff via the University website.

When asbestos abatement works take place at the University, the Asbestos Manager must be provided with documentation from the following parties:

- Framework Asbestos Consultant
- University Project Officers/Project Teams
- Framework Licenced Asbestos Removal Contractors

To confirm the safe asbestos removal and disposal has taken place; this must include; area clearance notification and air monitoring records and waste consignment note.

6.2 **Information Recorded**

The AMS records known and suspected ACMs in the University. Where ACMs are recorded as a minimum it shall record information on their:

- Location
- Material type
- Asbestos type
- Surface treatment
- Management status
- Date of inspection
- Name of person inspecting
- Date of next inspection

This information is completed the asbestos register shall automatically generate a “material risk assessment score” as identified within HSG264 Asbestos – The Survey Guide.

Additional information shall to be recorded includes:

- Normal occupant activity
- Accessibility
- Extent
- Number of occupants
- Frequency of use of area
- Average time in use
- Type of maintenance
- Frequency of maintenance
- Photographs
This information when completed within the asbestos register shall automatically generate a “priority risk assessment score” as identified within HSG264 Asbestos – The Survey Guide.

Further supporting and relevant documents shall be stored for each premise.

These shall include and comprise:

- Original/current management register
- Refurbishment or demolition surveys
- Bulk sample analysis reports
- Reassurance air tests
- Four stage clearance certificates
- Waste consignment notes (available within project documentation records from Frameworks Licensed Asbestos Removal Contractors)

The register shall also record information non-ACMs where they have been sampled as part of the survey process.

6.3 Updating the AMS

The AMS shall only be managed and updated by the Framework Asbestos Consultants.

Updates shall be undertaken following:

- Re-inspection of the ACM.
- Removal, repair or encapsulation of the ACM.
- Identification of further ACMs via bulk sampling.
- New management surveys.
- New refurbishment and demolition surveys.
- Changes/remodeling of floor layouts.

6.4 AMS Data Storage and Viewing

The AMS is an electronic web based system available via the University’s intranet system with a working copy held by the Framework Asbestos Consultant.

Read-only access shall be available to all authorised University Estates staff through the University’s Intranet system.

Access shall only be available to authorised Framework Consultants/Contractors and academic staff and students through the Asbestos Manager.

A request for authorisation can be made only through the Asbestos Manager.

A diagrammatic overview of the AMS system and asbestos survey processes are shown below:
7.0 RISK MANAGEMENT

7.1 Strategy

Where ACMs are in a safe condition and are unlikely to be disturbed they shall be left in situ and statutory re-inspected at regularly intervals determined by the Asbestos Manager in conjunction with the Framework Asbestos Consultant. This shall typically be every twelve months but may be increased/decreased based upon risk analysis.

ACM’s of minor damage shall be repaired and sealed. Where effective repair cannot be achieved ACMs shall be removed.

All abatement works with ACMs shall be undertaken by the University’s Framework Licensed Asbestos Removal Contractors, unless advised and approved otherwise by the Asbestos Manager.

7.2 Risk Assessment and Prioritised Actions

At the discretion of the Asbestos Manager known or suspected ACMs shall be the subject of a priority risk assessment as defined in HSG227 ‘A Comprehensive guide to managing asbestos in premises’. The assessment shall be automatically generated by the AMS software after data entry and reviewed by the Asbestos Manager, who will decide on appropriate actions following recommendations by the Framework Asbestos Consultant.

All ACMs shall be subject to a material risk assessment score in accordance with HSG264 and shall be the prime guide in assessing priority for action

The algorithm shall be based on the likelihood of an ACM releasing fibres if it is disturbed.

The AMS risk assessment rating shall take into account a number of factors when assessing the risk of anyone being exposed to asbestos fibres, as detailed below:

Material Assessment

a) Product Type - composites, boards, insulations;
b) Extent of damage / deterioration - good condition, damaged;
c) Surface treatment – composite materials, sprayed, sealed or encapsulated or unsealed;
d) Asbestos Type – Chrysotile, Amosite, Crocidolite;

Priority Assessment

a) Normal Occupancy Level – rare user, low disturbance, high levels;
b) Location, Accessibility & Extent;
c) Human Exposure Potential – number of occupants, frequency of use, average time in the area;
d) Maintenance Activity – type of maintenance activity / frequency of activity.

This risk assessment forms the basis of the AMP and determines the abatement/remedial actions to the ACM necessary to reduce the risk to its lowest practicable level.

Each of the parameters is scored and combined to give a total score between to determine the level of risk and priority.
High Priority Risk Assessment = high score rating
This indicates ACM's that require urgent attention. In some circumstances immediate plans for removal of the asbestos concerned should be implemented, or at least the rapid sealing and restriction of the affected area.

Medium Priority Risk Assessment = medium score rating
Indicates ACM's which require some action, encapsulating, sealing, enclosing or labelling. This asbestos should be removed as part of a phased programme.

Low Priority Risk Assessment = low score rating
Indicates ACM's in good / fair condition, no significant health risk if left undisturbed during maintenance and work activities. Materials within this category will be inspected on a yearly basis to ascertain any change in circumstances which could require re-assessment of priority rating.

8.0 ASBESTOS ABATEMENT
The risks identified via the asbestos management/R&D/bulk sampling surveys, shall be managed to reduce them to an acceptable level and as low as reasonably practical. The level of management and remediation/abatement shall be dependent on the risk that the ACM presents, and in consideration with the recommendation by the Framework Asbestos Consultant.

The University shall consider the following management/ remediation/abatement options;

8.1 Removal
ACM's are removed as a result of one or more of the following:

- Identified as part of the on-going prioritised ACM removal programme.
- ACM's made accessible as part of a construction or refurbishment project.
- ACM's made accessible because of areas vacated and where the removal is reasonably practicable.
- To enable other works to proceed (e.g. refurbishment and maintenance works).
- Discovery of damaged or high risk ACM's not identified as part of an asbestos survey.

Arrangements for the removal of ACM's must be discussed with the Asbestos Manager by the University Project Officer's/Project Team's with responsibility for the works involved. The Asbestos Manager/Framework Asbestos Consultant must review and approve the scoping and follow through with a safe system of work (RAMS – risk assessments and method statements) before work commences on site.

The removal of ACM must be considered a high risk operation that can only be carried out by a licensed asbestos removal contractor. The ACM removal works must be managed by the Framework Asbestos Consultant in conjunction with the University Project Officer's/Project Team's.
Sufficient time must be allowed at the early stages of the project and during the planning and removal stages to take account of:

- Request for Asbestos Survey/Brief.
- Agreement on the scope of the works including waste disposal arrangements.
- Contractor’s quotation, agreement of costing and assessment of method statement.
- Statutory HSE notification period (at least 14 days).
- Vacation of the work area (departmental staff, furniture and equipment).
- Isolation of building engineering services as required for safe working.
- Arrangements and services for the contractor: parking, area for de-contamination unit, supply of water and power, security arrangements etc.
- Liaison and provision of information for departments affected by the works.

8.2 Encapsulation or Seal

In circumstances where removal is not reasonably practical e.g. occupation/decanting issues, finance, programme etc. ACM’s may be encapsulated/sealed in order to contain and reduce the risk of ACM. Thus ACM’s may be left in-situ; with asbestos warning labels applied to the encapsulated/sealed ACM.

Arrangements for the encapsulation of ACM must be agreed with the Asbestos Manager/Framework Asbestos Consultant, who shall make the arrangements for the work and liaise with the all stakeholders involved.

8.3 Monitor/Manage in situ (Re-inspection)

An ACM that is in good condition can safely be left in-situ and monitored through statutory re-inspections.

To monitor and review the condition of identified ACM’s the Asbestos Manager is responsible for managing the statutory re-inspections carried out by the Framework Asbestos Consultants.

The ASM database shall be updated with any alterations to drawings, data or risk assessment following the statutory re-inspections.

For ACM’s such as asbestos gaskets in plant rooms or mastic pads in kitchens, the Asbestos Manager may, in consultation with the Framework Asbestos Consultant, increase the inspection period to a 2 yearly re-inspection.

ACMs left in situ shall be subject to the re-inspection regime. The Asbestos Manager, in consultation with the Framework Asbestos Consultant may increase/decrease this frequency if required by risk assessment but in this case removal should be considered.

To help identify ACM’s and prevent accidental damage, the Framework Asbestos Consultants shall provide labelling using standard ‘asbestos warning’ labels (or colour coding in specific circumstances e.g. contaminated basement areas). In firebreaks etc. labels will be used on both sides to prevent mistakes or confusion.

There will be circumstances when it is not practical to label (e.g. floor tiles).
8.4 Enclosed

Where an ACM is identified but cannot be removed, it is an option to restrict access by placing a physical barrier in front of the ACM materials. An asbestos warning label must be applied to the physical barrier.

9.0 LABELLING

Warning labels or appropriate signage will be applied to ACM's considered to be a significant risk to:

- Help prevent accidental damage, and
- Not cause undue concern

Lower risk materials such as floor tiles, textured coatings, cement materials will not be routinely labelled but adequate steps will be undertaken to raise site awareness of their presence e.g. briefings to Building Managers/Departmental Health and Safety Co-ordinators.

10.0 ASBESTOS CONTAINING MATERIALS (ACM) INFORMATION MANAGEMENT

The University has a duty to provide information on the location and condition of the materials to anyone who is liable to work on or disturb them.

The University undertakes this duty in several ways;

- The AMS is available to University members of staff and students with an appropriate University PC access address, via the Estates intranet page. The latter has restricted access and for non-estate staff access may be obtained through the Asbestos Manager.
- The ACM information contained within the AMS shall be inclusive of; a live asbestos register for each of the University building where then University UCL are the Duty Holder, drawings, and management/R&D surveys. Certain date shall have restricted access and may be obtained through the Asbestos Manager.
- Controlling building maintenance activities – all work order tickets issued to building maintenance contractors have a warning message to check the AMS database before undertaking work.
- University Project Officers shall supply information from the AMS database to Framework Consultants and Contractors in agreement Asbestos Manager.
11.0 TRAINING

11.1 Asbestos - Awareness Training

- Shall be provided by the Asbestos Manager in conjunction with the Framework Asbestos Consultant and Safety Services Safety Training Unit. This shall be provided to all university staff with responsibilities for projects or works that may disturb ACM within the building fabric.
- All University staff inclusive of estates project officers, operation, maintenance staff and others who may undertake works which disturb asbestos must attend such training.
- All Estates project officers and maintenance staff and others who may undertake works which disturb asbestos must attend such training.

11.2 Asbestos - Applications Based Training

- Shall be provided for all staff with direct responsibilities for projects or operation and maintenance works that may disturb ACM's within the building fabric and engineering services.
- All University staff inclusive of estates project officers, operation, maintenance staff and others who may undertake works which disturb asbestos must attend such training.
- Applications based training is available as two categories:
  - University Project Officers/Managers and Framework Consultants
  - University direct operation and maintenance Staff / Framework Contractors (tool box talks).

12.0 ASBESTOS MANAGEMENT PROCEDURES

12.1 Introduction

Damage of ACMs can lead to exposure to asbestos fibres, which over time may result in the development of asbestos-related diseases, depending on the level, duration and frequency of exposure. This can arise from minor work such as installing a new light fitting, through to any major refurbishment or demolition work.

12.2 Contractors Passes and Training

All contractors working on any of the University sites, building or grounds must attend a site induction and carry a contractor’s pass and permit to work and abide by the University’s safety rules for contractors.
12.3 Training for Asbestos Contractors, Consultants & Allied Trades

HSG247 Asbestos: the licensed contractors’ guide sets out a detailed content of the asbestos training modules for trades/roles involved in licensable work.

For licensable work, copies of the respective training records should be provided for each individual.

Training records shall be reviewed at the start of all licensed asbestos abatement works by the Framework Asbestos Consultants which shall also contribute to annual KPI audit of Framework Licenced Asbestos Removal Contractors.

12.4 Reviewing Asbestos Information for Operation & Maintenance Tasks

When undertaking any planned and reactive maintenance tasks, it shall be the responsibility of the University’s direct operation/maintenance staff or appointed contractor to review the asbestos information issued/obtained (asbestos register) as part of the works request and to determine if the works have an impact on ACMs and associated risk to the undertaker of these works (risk assessment).

12.5 Reviewing Asbestos Information for Minor Projects

All works within the University which have the potential to alter or damage the fabric of the building or engineering services shall be reviewed to determine if they could damage asbestos and present a risk.

The review shall be carried out by the University Project Officer's/Project Team’s responsible for the works, at the earliest opportunity in conjunction with the Asbestos Manager/Framework Asbestos Consultant.

This is essential in order to allow sufficient time to anticipate implications of ACMs and include sufficient and remediation within the project and its delivery. The assessments shall be undertaken at key stages of the design process. This shall include:

- Appoint Framework Asbestos Consultant
- Review known ACM information in the AMS
- If the AMS shows that asbestos is present and there is any suspicion or doubt about whether it could be disturbed, consult with the Framework Asbestos Consultant to assist in progressing an Asbestos Request for Information Form.
- Depending on the size and nature of the project decide if bulk sampling or R&D survey is required.
- When bulk sampling/R&D Surveys are required the areas should not be occupied.
- Arrange with occupants access for the survey to be carried out to proposed works area.

12.6 Requesting an Asbestos Survey

To ensure a survey is carried out safely, effectively and without undue disturbance to the University’s business and usual activities, the following steps should be taken:
• Submit a request for Asbestos Survey Form (Appendix A) in consultation with the Asbestos Manager/Framework Asbestos Consultant.

• Request an initial meeting with the Framework Asbestos Consultant (email estates.asbestos@university.ac.uk) or speak in person to the Asbestos Manager who will assist to advising the appropriate asbestos resource for delivering the project.

• Walk-through the job with the Framework Asbestos Consultant and supply them with building plans and specifications for the forthcoming works (so they can start to assess the resource requirements of the survey and the potential impact to the building and its occupants)

• Identify any potential access issues for the survey and risks to the surveyors and any other stakeholders. The following items should be considered prior to the survey:
  • Access requirements and timings (e.g. keys, need for escorts etc.)
  • Site hazards in area (e.g. substances, processes, plant isolations and downtimes i.e. compressed air, forced draught boilers, steam, ventilation systems, electrical systems etc)
  • Duration for closure of rooms/areas/systems and implications to the building users.

The Framework Asbestos Consultant shall then supply a cost for the survey based on the framework rates. The University Project Officer shall raise a purchase order (using the project code).

For medium to large projects the University Project Officers/Project Teams shall appoint the Framework Asbestos Consultant at the early stages of the project.

The Framework Asbestos Consultant shall provide consultancy duties during the planning and design development stages of the project as a key member of the design/project team based on the framework rates. The University Project Officer shall raise a purchase order (using the project code).

12.7 Additional Considerations for CDM Notifiable Projects

On appointment the Framework Asbestos Consultant shall directly consult with the University Project Officers/Project Teams regarding the project.

Starting at the earliest project lifecycle stages, a strategy shall be developed on how to control and manage the asbestos risks implications to the project. This is likely to involve survey work etc. detailed previously. At this stage, it is not always possible to involve the Principal Contactor and if this is the case, emerging issues need to be addressed at a later date when the Principal Contactor has been appointed. Thus the Framework Asbestos Consultant should be retained throughout all stages of the project.

Factors to be considered at the early project life cycle/design stage include:
If asbestos will be disturbed during the project and the nature of disturbance i.e. building fabric or engineering services.
Could the Designers “design out” the risk by avoiding disturbing asbestos.
Will additional protection measures be necessary
The full extent of the R&D survey and when it can be undertaken
Whether the project provides the opportunity to remove asbestos in the area, even if it is not interfering with the work (this is University’s preferred approach depending on available project and strategic maintenance finances).
Impact on the programme
Impact of project finances
Determine with the University Project Officers/Project Team, in the case of asbestos abatement works how these are best procured i.e. enabling works or as part of the overall construction package.

Having taken these factors into account, any residual risks (and relevant survey reports) from asbestos should be included in the Pre-Construction Information compiled by the Principal Designer (Former Construction Design and Management Coordinators (CDMC) role).

On appointment, the Principal Contractor, who is responsible for The Construction Phase Plan shall include for developing control systems to control the risk from asbestos and any other risk to health and safety during the construction phase. The Framework Asbestos consultants shall determine whether the proposed controls are satisfactory.

During the construction phase, the Principal Contractor shall be responsible for controlling all risks from asbestos and continue to liaise with the University Project Officers/Project Teams and Framework Asbestos Consultant.

Should there be any project/scope changes during the construction phase, e.g. contract variations, change in project boundaries etc. which result in further disturbance of asbestos. The Framework Asbestos Consultant shall review such changes and advise the University Project Officers/Project Teams of mitigating actions and implications to the project inclusive of programme and cost.

If asbestos abatement works are occurring during the Construction Phase, the Framework Licensed Asbestos Removal Contractors shall be employed as Nominated Sub-Contractors to the Principal Contractor. The Framework Asbestos Consultant shall be retained to undertake and project management/supervise/air monitoring role for the asbestos abatement work based on the framework rates. The University Project Officer shall raise a purchase order (using the project code).

### 12.8 Asbestos Abatement Work

Where asbestos abatement are required the following processes and procedures shall be adopted:

#### 12.9 Asbestos Abatement for Notifiable Licenced & Non Licenced Works

- **a)** The University Project Officer’s/Project Team’s shall ensure that a tender package inclusive of a written particular and general specification, drawing etc. is prepared by the Framework Asbestos Consultants for the abatement works.
The specification shall include:

- Material to be worked on (including location and quantity).
- What work it to be carried out (removal, encapsulate etc.).
- Relevant information to enable a plan of work to be developed e.g. location of works, hours of access, nearest feasible location for DCU etc.
- Annotated drawings to provide clarification of locations etc.
- Building mechanical and electrical plant and systems to be isolated.
- Indicative programme inclusive of out of normal working hours.
- Contractors site visit prior to tender submission.
- Any specialist trades or domestic sub-contractors deemed necessary i.e. engineering sub-contractors, scaffolding etc.
- Tender summary and cost sheets as per framework agreement.

Note (i) - for design and build projects the abatement documents shall be written in the context of performance specifications/documents to form part of the Employers Requirements, with the Framework Licenced Asbestos Removal Contractors acting as Nominated Sub-Contractors.

Note (ii) - for traditionally procured projects (specification and drawings) the abatement documentation shall be issued as part of the main tender package with the Framework Licenced Asbestos Removal Contractor as a Nominated Sub Contract to the Principal Contractor or where the abatement works form a separate enabling package prior to the main contract the tender documentation shall be issued directly to the Framework Licenced Asbestos Removal Contractors whom shall adopt Principal Contractor duties.

Note (iii) – in all cases the Framework Licenced Asbestos Removal Contractors shall be utilised for tendering purposes unless approval has been ascertained form the Asbestos Manager to use other organisation not on the universities framework.

b) University Project Officers/Project Teams to appoint the Framework Asbestos Consultant to undertake a project management, site supervisory and air monitoring role for the proposed asbestos abatement works. The scope of this role is set out in the Asbestos Consultants Framework Agreement.

- For abatement works valued under £5000, the University Project Officer’s/Project Team’s shall appoint the Framework Asbestos Consultant to provide a technical specification/tender package complete with the Particular and General Specification for Asbestos Remediation Works, drawings and preliminaries and issue to first ranked Framework Licensed Asbestos Removal Contractor for quotation.

- For abatement works valued £5000 and greater, and where the Framework Licensed Asbestos Removal Contractor has Principal Contractor duties, the University Project Officer’s/Project Team’s shall appoint the Framework Asbestos Consultant to provide a technical specification/tender package complete with the Particular and General Specification for Asbestos Remediation Works, drawings and preliminaries and issue tender packages to all the University Framework Licensed Asbestos Removal Contractor for tender.

When all the quotes/tenders have been received, they shall be evaluated by the Framework Asbestos Consultant in accordance with the University’s standard financial procedures and a tender report issued.
Once the tenders have been reviewed and a Framework Asbestos Removal Contractor selected the University Project Officer's/Project Teams/Framework Asbestos Consultant shall set up a pre-start meeting at least 21 days before the start date of the project. This will allow the exchange of information between the various stakeholders involved in the project to progress/finalise:

- Logistics such as parking, water and electrical services for decontamination units (DCUs), office space for an analyst, waste skips etc.
- Establish how unauthorised access to the work area will be prevented, including management of corridor closures etc.
- Arranging any necessary services isolation or enabling works, for example, electrical connections, M&E shutdowns etc.
- Site familiarisation
- Liaison with key stakeholders (e.g. invite relevant faculty staff and provide a copy of the programme)
- Particular attention to co-operation and co-ordination will be needed where non-Asbestos licensed contractors are used for enabling works prior to asbestos remedial works
- Enable sufficient information to be collected to allow notification to the HSE
c) The Framework Licensed Asbestos Removal Contractor shall issue a Project plan which must allow for at least 7 days for the plan of work to be developed and approved by the Framework Asbestos Consultant. This shall be followed by at least a further 14 continuous days statutory notification period prior to commencing the abatement works.

d) The ASB5 notification shall be issued to the Framework Asbestos Consultant.

Table 1 provides examples of licensable and non-licensable work. (extract from

<table>
<thead>
<tr>
<th>Work which requires a licence from HSE</th>
<th>Work which does not usually require a licence from HSE</th>
</tr>
</thead>
<tbody>
<tr>
<td>Removing sprayed coatings (limpet asbestos)</td>
<td>Small, short duration maintenance tasks where the control limits will not be exceeded</td>
</tr>
<tr>
<td>Removal or other work which may disturb</td>
<td>Removing textured decorative coatings by any suitable dust-reducing method</td>
</tr>
<tr>
<td>pipe lagging</td>
<td></td>
</tr>
<tr>
<td>Any work involving loose fill insulation</td>
<td>Cleaning up small quantities of loose/fine debris containing ACM dust</td>
</tr>
<tr>
<td>Work on millboard</td>
<td>(where the work is not sporadic and of low intensity, the control limit will not be exceeded and it is short duration work)</td>
</tr>
<tr>
<td>Cleaning up significant quantities of</td>
<td>Work on asbestos cement products or other materials containing</td>
</tr>
<tr>
<td>loose/fine debris containing ACM dust</td>
<td>asbestos(such as paints, bitumen, resins, rubber, etc.) where the fibres are bound in a matrix which prevents most of</td>
</tr>
<tr>
<td>(where the work is not sporadic and of low intensity, the control limit</td>
<td>them being released (this includes, typically, aged/weathered AC)</td>
</tr>
<tr>
<td>will be exceeded or it is not short duration work)</td>
<td>Work associated with collecting and analysing samples to identify the presence of asbestos</td>
</tr>
<tr>
<td>Work on AIB, where the risk assessment indicates that it will not be of</td>
<td></td>
</tr>
<tr>
<td>short duration</td>
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</tbody>
</table>
12.10 Waiver

The University shall only permit the use of waivers (i.e. an application to the HSE to waive the usual two week notification period) in extreme and exceptional circumstances.

Note that the HSE is likely to pay close attention to projects which apply for waivers (and may wish to attend site) and they will quite rightly want to know why such an emergency could not have been prevented by effective forward planning.

Waivers shall only be allowed with the acceptance of the Asbestos Manager, or Safety Services.

12.11 CDM Notifiable Project

Where asbestos abatement projects exceed 30 continuous days with more than 20 workers or involving 500 man days, the project is notifiable to the HSE under the CDM Regulations and the project should progress accordingly with the relevant appointments and resources in place.

12.12 Monitoring Asbestos Removal Works

Non notifiable projects - The Framework Asbestos Consultant shall be commissioned by to monitor site set up and undertake reassurance air tests as required based on the framework rates. The University Project Officer shall raise a purchase order (using the project code).

Notifiable projects - The Framework Asbestos Consultant shall be commissioned by the University Project Officer's/Project Teams to monitor site set up, attend daily to monitor works and produce certificate of reoccupation as required, based on the framework rates. The University Project Officer shall raise a purchase order (using the project code).

12.13 Reoccupation and handover following notifiable works

- No access is permitted to the affected area until the certificate of reoccupation has been issued by the Framework Asbestos Consultant.

- The building users and department heads or other nominated Faculty persons shall be advised via email and verbally that the area is safe for reoccupation.

- Certificates of reoccupation will form part of project handover files. These files shall be issued to the University Project Officer’s/Project Teams.

- Reassurance air tests are to be held in project files as well as the AMS.

- The Framework Asbestos Consultant shall update the AMS as soon as possible and within a maximum period of a month for major projects where this will not be achievable.

- Handover file
  - ASB5 notification
  - Asbestos consultants daily audit sheet
12.14 Waste Management

Asbestos waste is ‘Hazardous Waste’ when it contains more than 0.1% asbestos and fall under the Hazardous Waste Regulations for safe handling and disposal.

Following any asbestos abatement works undertaken within any of the University sites or buildings. The Framework Licensed Asbestos Removal Contractor must provide all relevant waste management documentation including that from the asbestos removal company to confirm the removal has taken place; and a waste consignment note provided.

During any asbestos abatement works it is the duty of the University Project Officer's/Project Teams to ensure adequate space available for asbestos skips etc. to facilitate safe storage/disposal of asbestos waste. This shall be outlined in the plan of work submitted by the Framework Licensed Asbestos Removal Contractor.

13.0 EMERGENCY PROCEDURES

CAR requires employers to take action in the case of escape of asbestos fibres into the workplace.

The University has formulated an emergency plan in order to deal with an asbestos emergency.

13.1 What Constitutes an Emergency?

Emergency situations can relate to situations where:

- Suspect ACMs are encountered.
- Known or suspected ACMs are damaged or discovered in a damaged state.
- Remedial works that result in release of elevated airborne fibre levels.

In all cases the Asbestos Manager or a member of the Estates Safety Services should be contacted immediately.

The following measures are to be taken, to prevent or minimise the exposure of personnel to airborne asbestos fibres.

13.2 Emergencies During Construction & Refurbishment Projects

The same process applies but the Principal Contractor/Framework Lincensed Asbestos Removal Contractor shall be fully involved in the process.

It should be noted that should asbestos be discovered and requires abatement actions, an inevitable delay in project works in the affected area is likely to ensue, possibly up to 4 weeks depending on the scope of the abatement works required.

13.3 Urgent Access to an Asbestos Abatement Work Area

In the case of an emergency (medical, services, safety, etc.) only those personnel
who have received appropriate training, that are properly protected and are under the
guidance of the Framework Asbestos Consultant or Licensed Asbestos Removal
Contractor shall be allowed entry into an asbestos enclosure.

13.4 **An Emergency Situation Resulting in a Release of Elevated Airborne Fibre Levels Outside the Asbestos Abatement Work Area**

An asbestos fibre release may occur for a number of reasons, for example:

- Fire within or outside the enclosure
- Loss of negative pressure i.e. negative pressure unit failure.
- Enclosure rupture/damage
- Accidental disturbance of un-registered ACMs by operations and maintenance personnel.

In such cases air tests shall be deployed as soon as is reasonably practicable (the Framework Asbestos Consultants have a 120 minute response time for such emergencies) and until such time, the area shall be made safe.

Personnel outside the enclosure shall be cleared prior to this event and an area of exclusion created within which PPE must be worn at all times.

Negative Pressure Units (NPUs) shall be left operational where possible to provide some defence against airborne fibre spread.

In all cases should access be required within the contaminated space, the Asbestos Manager and Framework Asbestos Consultant or a member of the Estates Safety Services in their absence should be contacted for further advice and instructions.

13.5 **Emergency Procedure And Process Chart**

1. **STOP THE WORK IMMEDIATELY**

2. Windows and doors should be closed if it is possible to do so without further disturbance to the damaged material and additional risk of inhalation of fibres.

3. **ALL PERSONS SHOULD LEAVE THE AREA**

4. **POST AN OUT OF BOUNDS NOTICE, SEAL UP DOORWAYS USING TAPE.**

5. **REPORT TO ONE OF THE FOLLOWING:**
   - University Customer Services
   - Asbestos Manager/Safety Services
   - University Project Officer
   - University Departmental Project Manager/Supervisor
   - Security Officer
THE AREA MUST REMAIN UNOCCUPIED UNTIL INVESTIGATION BY THE ASBESTOS MANAGER/FRAMEWORK ASBESTOS CONSULTANTS/SAFETY SERVICES

The Asbestos Manager/Framework Asbestos Consultant shall/will assess the situation and make suitable arrangements. This may involve air monitoring, sampling and analysis of the suspect material or arrangements for the removal of the material and a clean of the area. Suspect contaminated areas must remain out of bounds until cleared by the Asbestos Manager/Framework Asbestos Consultant.

In a situation where the aforementioned are unavailable the Framework Licensed Asbestos Removal Contractor shall be contacted to attend and manage the situation.

EMERGENCY PROCEDURE AND INCIDENT REPORTING

- Discovered or damaged materials that could contain asbestos?
  - Stop work immediately
  - Keep everyone else out of the area
  - Report the problem to the person in charge as soon as possible
  - Put up a warning sign ‘possible asbestos contamination’
  - Give client a sample to send for analysis
  - Does it contain asbestos?
    - NO: No action required
    - YES: The client must make an Asbestos Management Plan and decide if the task needs an HSE-licensed contractor

- Is there dust or debris on clothing?
  - A little, eg dust on sleeve, on shoes
    - Stay put
    - Get help. All put on PPE
  - A lot, eg contaminated clothes, hair, footwear
    - Call for help. All put on PPE, helper put on PPE
    - Wipe down with damp rags
    - Undress. Shower, wash hair
    - Put contaminated clothes, towels etc in a plastic bag for a specialist laundry. Leave washing facilities clean

- Dispose of rags as asbestos waste
- Keep a record of the event
14.0 MANAGING AND RECORDING ACCIDENTAL ASBESTOS EXPOSURE

14.1 Incident Reporting

If it is found or suspected that persons have been exposed to airborne asbestos fibres (normally taken to mean a level that exceeds 0.01 fibres per ml of air) an incident report must be completed and sent to Safety Services.

In the event of an asbestos emergency, the Asbestos Manager or in their absence a member of the University Safety Services shall:

- Immediately raise an incident log onto the University’s Risk-Net systems and attend site.
- Ensure Incident Log is updated following the incident and investigation progresses.
- Incident report to cross refer to air test or sample numbers for future reference.
- When area proven to be safe to reoccupation, removes restriction notices etc. and liaises with all relevant stakeholders.
- Retain incident log records.

Following the investigation the Asbestos Manager shall supply Safety Services with additional information for the incident report that shall include the nature of the exposure, the type of asbestos material/fibre content and copies of any analytical or air test records.

Safety Services shall assess the requirement to report under the RIDDOR regulations.

Where it is suspected that University staff or students may have been exposed to asbestos fibres they shall be referred to Occupational Health for advice about possible health risks and actions that may be required. Copies of the incident report will be kept by Safety Services, Occupational Health and a copy provided to the person involved.

14.2 Information to be Obtained and Provided

“Exposure” shall be taken to mean exposure to a level that exceeds the current Control Limits set out in CAR (as measured by air testing or in the absence of an air test an informed judgement should be made and the basis of that judgement recorded on the Incident Report Log).

Where an employee may have been exposed the following shall be directed to the University’s Occupation Health Department, for further counsel and the following information noted within the Occupational Health records:

- Employee name
- Date and time of incident
- Nature of exposure (damage or work to ACM, uncontrolled release of asbestos fibre from asbestos removal enclosure etc.)
- Location of incident
- Type of asbestos fibre/asbestos material
- Duration and level of exposure
- Copies of any associated analytical records
- Details of advice etc. given to individual (health risks of asbestos etc.)
This information shall be store by the University for future reference.

A copy of this information shall be provided to the employee with the recommendation that it be kept indefinitely.

Where the exposure relates to non-employees, the Asbestos Manager or a member of the Estates Safety Services in their absence shall record known details and shall keep such records. A further copy shall be provided to their employer so as to assist with health surveillance etc. of the person(s) involved.

14.3 Release Of Information About Personal Exposure

Requests for information relating to personal exposure shall be managed by the Asbestos Manager or a member of the Estates Safety Services in their absence.

Where personal, sensitive data relates to an identifiable individual then the provisions of the Data Protection Act apply. Such data shall only be issued to the named individuals to which the data relates although these may need to be disclosed to the University’s Insurers.

14.4 RIDDOR Notification

Where exposure occurs to a member of staff or student the Control Limits, reporting of the incident to the HSE under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) shall be assessed and carried out by the University Safety Services.

Where the incident area is under the control of a Contractor or Principal Contractor the reporting requirement shall form part of their responsibilities. Copies of such notification shall be required to be submitted to the appropriate statutory bodies and the University’s Asbestos Manager and Safety Services.

15.0 MONITORING & REVIEW

The Asbestos Management Plan shall be reviewed annually or, at changes in legislation or changes to University procedures to ensure they remain up to date.
16.0 REFERENCES

a) Control of Asbestos Regulations 2012.
b) HSG 143 Managing and Working with Asbestos (ACOP)
c) HSG 227 ‘A Comprehensive Guide to Managing Asbestos in Premises’ (HSE)
d) HSG 264 ‘Asbestos: The Survey Guide’ (HSE)
e) CDM Regulations 2015
f) UCL Asbestos Consultants Framework Agreement 2015
g) UCL Licenced Asbestos Removal Contractors Framework Agreement 2015
h) UCL General Specification For Asbestos Remediation Works
i) UCL Fire Safety policies, standards and procedures.
j) All other relevant UCL policies, standards and procedures
APPENDIX A

REQUEST FOR AN ASBESTOS SURVEY/BRIEF
1.0 INTRODUCTION

The Request for an Asbestos Survey form is to be used when there is a requirement to undertake one of the following:

- Management survey
- Refurbishment or Demolition Survey
- Bulk sample

The purpose of the form is to ensure that all relevant information is collected for the efficient undertaking of the work and record keeping on completion.

The form should be used for both project and non-project related works.

For projects monitored by the Project Services Office the form will be automatically passed to the Project Officer at the PSO Stage 2.

It is the responsibility of the person completing the form to ensure that sufficient information is provided to enable the Framework Asbestos Consultant to provide a quotation for undertaking the works including visits to site if required to gain information to base their quotation on.

The project completion data recorded at the end of the form shall be collected for each project by a software process and summated to provide audit and management information to the Asbestos Manager.

2.0 COMPLETION OF FORM

Main Project Title
This should generally follow the following format:
Building/Street Name / Street Number / Building Number / Short description

Project Ref.
The Portfolio reference is as supplied by Portfolio Services i.e. PS12345.

The Other reference may be the Estates File Index System number, an individual’s reference number, a department’s reference number or a FAMIS Work Order ticket number.

Project Stage
This is important as it gives an indication into the urgency of the work as well as being useful as an historical record to decide if improvements can be made in project planning.

Scope of Main Project Works
This should clearly briefly define the type of project to be undertaken areas affected and if the works extend beyond physical boundaries etc. more than one room, service ducts etc.
Is area occupied?
It is important to know if the area is occupied because it will give an indication of when the work can be undertaken. If the survey and subsequent abatement works can only be undertaken out of hours then this could significantly affect the cost of the work.

Area to be made good during survey
It is important that this is clear at the outset for Refurbishment or Demolition surveys and the extent of “making good” agreed.

Area to be made good after survey
As above.

Project Officer
This is the person requesting the survey and who will be the main contact for the surveying company.

It shall be the responsibility of this person to ensure that the “Request for an Asbestos Survey” form is adequately completed and that suitable arrangements are made for the asbestos surveyor to have access to the particular area to enable them to gather information to be able to provide the quotation.

It is important that the Project Officer makes the arrangements efficiently so as not to waste the Framework Asbestos Consultant time and incur unnecessary costs.

Type of Survey
The “Request for an Asbestos Survey” form must be quite clear on what work is expected from the surveying company. In general it will consist of one or more of the following:

- Management Survey
- Refurbishment or Demolition Survey
- Bulk sample
Building
Building Number and Name are mandatory.

Location of Survey: (if drawings are not provided)
If “marked-up” drawings are not to be provided then this should clearly define the extent of the survey area.

Timescales
Request Date: - This is the date that the Project Officer requests that the survey be undertaken.

Date survey required by - This is the latest date that the survey can be undertaken. It is important that this date is specified because it may decide which company can undertake the survey.

Details of Past Surveys: (Areas & limitations)
This section is to be completed by the Framework Asbestos Consultant.

This is important because during previous surveys they may have been areas of “no access” or limitations due to the purpose of the survey e.g. did not include ceiling voids cupboard space, external items i.e. window sills etc.

Drawings List
This should clearly define what drawings are attached to the request and their revision.

Note
It is important that the full perimeters of project and survey boundaries are defined so that there is no ambiguity in the area to be surveyed to act as confirmation that sufficient areas are to be surveyed.

The boundaries are to cover riser ducts, tunnels etc.

Survey to cover
The tick boxes shown are to act as an aide memoire to ensure that the survey covers all areas of project works.

Special Instructions
This should cover points that have not been covered elsewhere and could include areas / items that have presented problems in the past. e.g. furniture with hidden insulation panels, brackets / supports with hidden ACM.

All Fire Breaks to be re-instatement
If re-instatement is required then a clear agreement should be made on how, by whom and when this will be undertaken.

Additional comments: (i.e. restrictions or access, live plant/electrical systems etc.)
The Project Officer must make every effort to ensure that where required all areas are surveyed. If services are to be isolated or electrical distribution boards opened then this should be planned with departments and the DLO.

Prepared by and date
This should be the name of the person completing the form.
**Project Data**  
This section is to be completed by the Appointed Person (Asbestos) and contains information that will be collected from each Request for an Asbestos Survey form and summated and used for the following:

- future strategic planning
- estimating future project costs
- Collecting the annual weight of asbestos hazardous waste
- Ensuring all necessary documentation is provided by the asbestos removal contractor at the end of the remediation works.

**3.0 TIMESCALES**

For average size refurbishment or demolition surveys following receipt of the full documentation specified on the form the surveying company will:

- Within seven days of receiving the request carry out the “new project” initial site visit.
- Submit the survey proposal within 3 working days following the site visit.
# REQUEST FOR AN ASBESTOS SURVEY

*(Please e-mail to estates.asbestos@ucl.ac.uk)*

<table>
<thead>
<tr>
<th>Main Project Title :</th>
<th></th>
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<tbody>
<tr>
<td>Project Ref :</td>
<td>Portfolio</td>
</tr>
<tr>
<td>Project Stage : (Select one)</td>
<td>RIBA</td>
</tr>
<tr>
<td>Scope of Main Project Works :</td>
<td></td>
</tr>
<tr>
<td>Is area occupied :</td>
<td>☐ Yes</td>
</tr>
<tr>
<td>Area to be made good during survey :</td>
<td>☐ Yes</td>
</tr>
<tr>
<td>Area to be made good after survey :</td>
<td>☐ Yes</td>
</tr>
<tr>
<td>Project Officer :</td>
<td>Name :</td>
</tr>
<tr>
<td></td>
<td>☎</td>
</tr>
<tr>
<td>Type of Survey :</td>
<td>☐ Management</td>
</tr>
<tr>
<td>Building :</td>
<td>Building Number</td>
</tr>
<tr>
<td>Building Address</td>
<td></td>
</tr>
<tr>
<td>Location of Survey : (if drawings are not provided)</td>
<td></td>
</tr>
<tr>
<td>Timescales :</td>
<td>Request Date :</td>
</tr>
<tr>
<td>Department Contact</td>
<td>Name</td>
</tr>
<tr>
<td>--------------------</td>
<td>------</td>
</tr>
<tr>
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<tr>
<td>Details of Past Surveys: (Areas &amp; limitations) To be completed by UCL AP (Asbestos)</td>
<td></td>
</tr>
<tr>
<td>Drawings List: (attach to document)</td>
<td></td>
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<tr>
<td>Note:</td>
<td></td>
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<tr>
<td>Full perimeter of Project boundary to be shown. e.g.</td>
<td></td>
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<tr>
<td>Full perimeter of Survey boundary to be shown. e.g.</td>
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</tr>
<tr>
<td>Boundaries to cover any links between different areas / rooms etc.</td>
<td></td>
</tr>
<tr>
<td>☐ All spaces and fabric</td>
<td>☐ Furniture &amp; fittings</td>
</tr>
<tr>
<td>☐ Ceiling voids</td>
<td>☐ Walls</td>
</tr>
<tr>
<td>☐ Windows</td>
<td>☐ Doors</td>
</tr>
<tr>
<td>☐ Floors</td>
<td>☐ Cupboard space</td>
</tr>
<tr>
<td>☐ Lobbies</td>
<td>☐ Corridors</td>
</tr>
<tr>
<td>☐ Risers</td>
<td>☐ Ducts</td>
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<tr>
<td>☐ Tunnels</td>
<td>☐ Subways</td>
</tr>
<tr>
<td>☐ Lift shafts</td>
<td>☐ Under floor spaces</td>
</tr>
<tr>
<td>☐ Mechanical Services</td>
<td>☐ Electrical Services</td>
</tr>
<tr>
<td>☐ Other: (i.e. plant, equipment)</td>
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</tr>
<tr>
<td>Special Instructions:</td>
<td></td>
</tr>
<tr>
<td>All Fire Breaks to be re-instated:</td>
<td>☐ Yes</td>
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### Project Data
To be completed by the UCL AP (Asbestos)

<table>
<thead>
<tr>
<th></th>
<th>Survey</th>
<th>Remediation</th>
<th>Consignment Note</th>
<th>Arms W-Drive update</th>
<th>Actual Survey completion date</th>
<th>Completion Pack</th>
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