UNIVERSITY COLLEGE LONDON STANDARD

ASBESTOS MANAGEMENT PLAN

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<tr>
<th>Revision</th>
<th>Date</th>
<th>Nature of Revision</th>
<th>Prepared by</th>
<th>Approved by</th>
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<td>Ian Oram</td>
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<td>Emma Shirbon &amp; Roy Capleton</td>
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<td>David Ilott</td>
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This UCL Asbestos Management Plan has the authority of the President and Provost who is responsible for ensuring its implementation.
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UCL ASBESTOS MANAGEMENT PLAN

POLICY STATEMENT

UCL Estates will take appropriate action to ensure health and safety of staff, students and other who may be affected by the risks associated with asbestos containing materials present in buildings within the University College London estate.

The University Policy is:

- To prevent the exposure of staff, students and others to the health risks associated with asbestos.
- To identify and monitor of Asbestos Containing Materials (ACM) in UCL 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 register – ARMS.
- To provide information on asbestos.
- To regularly review the asbestos management plan.
1.0 INTRODUCTION

Asbestos is the term used for the fibrous forms of several naturally occurring minerals. The three main types of asbestos are:

- Crocidolite (blue)
- Amosite (brown)
- Chrysotile (white)

Asbestos has been the subject of gradual voluntary and statutory bans since 1969. 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 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.

1.1 PURPOSE

The purpose of this Asbestos Management Plan is to;

- Demonstrate UCL’s commitment to comply with the Control of Asbestos Regulations 2012.
- Clearly identify the responsibilities of the duty holder.
- Detail the mechanism by which UCL will prevent the exposure of staff, students and others to asbestos and prevent the spread of asbestos to the lowest level reasonably practicable.

1.2 SCOPE

There are currently 195 buildings within the UCL estate; these are a mixture of freehold, leasehold and informal occupation arrangements with 3rd parties.

Where UCL owns controls or maintains the building, UCL is the duty holder for ensuring compliance with the Control of Asbestos Regulation 2012.

Those buildings currently outside the scope for UCL as the duty holder are those buildings for which the UCL Estates and Facilities division are not maintaining;

- NHS Trust Buildings
- Eastman Dental Institute
- Leasehold buildings where UCL do not have maintenance or repair obligations.
As UCL has members of staff and students 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 Control of Asbestos Regulations and any ACM information is available for review by UCL.

2.0 DEFINITIONS

Duty Holder

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 Survey

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, including foreseeable maintenance and installation.

Refurbishment and 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.

2.1 ABBREVIATIONS

<table>
<thead>
<tr>
<th>Abbreviation</th>
<th>Description</th>
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<tr>
<td>ACM</td>
<td>Asbestos Containing Material</td>
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<td>AMP</td>
<td>Asbestos Management Plan</td>
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<td>ARMS</td>
<td>Asbestos Register Management System</td>
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<td>CAR</td>
<td>Control of Asbestos Regulations 2012</td>
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<td>HSE</td>
<td>Health &amp; Safety Executive</td>
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<td>HSC</td>
<td>UCL Health and Safety Committee</td>
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<td>LTM</td>
<td>Long Term Maintenance</td>
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<td>UKAS</td>
<td>United Kingdom Accreditation Services</td>
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<td>UCL</td>
<td>University College London</td>
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<tr>
<td>RIDDOR</td>
<td>Reporting of Injuries, Diseases and Dangerous Occurrences Regulations</td>
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<td>FAMIS</td>
<td>Facilities Management Information System</td>
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3.0 REFERENCES

Control of Asbestos Regulations 2012
Asbestos: The Survey Guide 2010
4.0 ROLES & RESPONSIBILITIES

Director UCL Estates
Responsibility for the strategy and deployment of resources for the control of ACM at UCL

Council
“Duty Holder”

President and Provost

Health & Safety Committee

Director UCL Estates
Responsibility for the strategy and deployment of resources for the control of ACM at UCL

UCL Estates
“Appointed Person – Asbestos”
Responsibility for the day-to-day management of ACM, maintaining ARMS and the provision of information and advice about ACM.

Provision of Information and advice

Estates Property Management Team

Estates Project Managers and Designers

Estates Managers and Supervisors of maintenance and general repair works

FAMIS Manager

Departmental
Heads
Project Managers
Supervisors
Line Managers

Other Groups
Consultants
Contractors
Etc.
4.1 All Employees & Contractors

All employees and contractors to UCL have a duty to cooperate with the DUTY HOLDER; as well as the specific roles outlined below and will;

- Attend health and safety training specified by Safety Services.
- Disseminate information about asbestos to staff and contractors they are responsible for, by reviewing the ARMS database and obtaining information from the UCL Appointed Person Asbestos.
- Report any suspected asbestos materials or damage to the asbestos containing materials to the UCL Appointed Person Asbestos by calling Customer Services 30000.

4.2 UCL Council – DUTY HOLDER

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

The duty to manage asbestos is contained in regulation 4 of the Control of Asbestos Regulations 2012. It requires the person who has the duty (i.e. the "duty holder") to:

- take reasonable steps to find out if there are materials containing asbestos in non-domestic premises, and if so, its amount, where it is and what condition it is in;
- presume materials contain asbestos unless there is strong evidence that they do not;
- make, 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;
- assess the risk of anyone being exposed to fibres from the materials identified;
- prepare a plan that sets out in detail how the risks from these materials will be managed;
- take the necessary steps to put the plan into action;
- periodically review and monitor the plan and the arrangements to act on it so that the plan remains relevant and up-to-date; and
- provide information on the location and condition of the materials to anyone who is liable to work on or disturb them

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

4.3 The President and Provost

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

The President and Provost has 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.

4.4 Health and Safety Committee (HSC)

HSC are responsible to the Provost and President for the planning, consultation and dissemination of the arrangements made within the Asbestos Management Plan.

4.5 UCL Estate Director

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 UCL.

The Director has appointed the “Appointed Person Asbestos” as the competent person for the day-to-day management of ACM and ensure those staff who manage or supervise projects and activities that could disturb ACM are aware of their responsibilities under this plan and competent to undertake the work.
4.6 UCL Estates “Appointed Person – Asbestos”

The Appointed Person Asbestos has responsibility for the day-to-day management of ACM in UCL buildings, equipment and areas under its control and must:

- maintain the asbestos register (ARMS database)
- ensure asbestos register property list correlates with FAMIS property list
- ensure asbestos register records who is duty holder for re-inspections
- arrange for asbestos surveys where necessary
- arrange for annual re-inspections of known ACM and the revision of the ARMS database.
- provide information and advice about ACM to Estates and departmental project managers involved in works that may disturb ACM within UCL buildings.
- provide information and advice about ACM to other persons, designated by project managers, who are involved in works that may disturb ACM within UCL buildings.
- arrange for the removal or containment of ACM as part of the on-going asbestos removal, containment program or project works.
- monitor the removal of ACM from UCL properties to ensure it is only undertaken by licensed asbestos contractors with approved method statements.
- annually audit the appointed licensed asbestos contractors, waste disposal consignment notes, notifications and air monitoring records.
- in liaison with the Safety Services Training Unit provide and arrange for asbestos awareness courses for staff who carry out or manage work that may disturb ACM at UCL
- establish emergency procedures to deal with any unplanned / uncontrolled disturbance of ACM at UCL
- ensure this plan is up to date and monitored
- request asbestos survey/register information from UCL Property for all new property acquisitions.
- provide asbestos register information to UCL Property for all property disposals

4.7 Head of UCL Departments, School and Divisions

Heads of Department must;

- Arrange for any construction and refurbishment work required within departmental premises to be carried out with the co-operation and permission of UCL Estates so that the management of ACM is considered at the planning stage.
- Arrange for the removal or containment of known ACM within departmental equipment.
- Ensure departmental project managers or supervisors of activities that may disturb ACM are aware of their responsibilities under this plan and have attended an asbestos awareness course.

4.8 UCL Managers & Supervisors (Departmental & Estates)

General refurbishment and maintenance works include amongst other activities;

- construction, refurbishment, maintenance and engineering projects
- security systems, information systems, telecommunications, cable runs and
• general maintenance/repair works

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

• Consult with UCL Estates before commencement of works involving penetrations into the fabric of a UCL building or the disturbance of materials above ceilings and in service ducts.

• Obtain information from the UCL asbestos register about the location, type and risk level of ACM present in the project work area.

• Where necessary seek the advice of the Appointed Person Asbestos about ACM within the area of their project.

• Contact the Appointed Person Asbestos to arrange for a refurbishment or demolition survey to be carried out where the work is likely to be intrusive and disturb ACM not identified by a management survey.

• 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.

• Make arrangements for staff and contractors to receive asbestos awareness training and ensure they are familiar with the asbestos labelling used by UCL.

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

• Inform the Appointed Person Asbestos of any suspect material reported to them and ensure that work is halted until the suspect material is investigated by Estates.

4.9 UCL Estates - Property Management Team

The Estates Property Management Team must;

• As far as reasonably practicable confirm that properties purchased on behalf of UCL are either free of ACM or that there is (or is obtained) information about the presence of ACM (normally an asbestos register).

• 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 UCL. Members of the Property Management Team must keep the Appointed Person Asbestos informed about ACM issues involved in the properties they are dealing with.

• Provide asbestos survey/register information to Appointed Person Asbestos for all new property acquisitions, leasehold (long or short term) and freehold, and confirms WHO is the duty holder, landlord or UCL, (see item 5.1.3)

• Request asbestos register information from Appointed Person Asbestos for inclusion in UCL property disposal transactions
4.9.1 **UCL Estates – FAMIS Manager**  
The FAMIS Manager, or his nominated person, must;  
- Notify the Appointed Person Asbestos each time the FAMIS property register is amended to reflect a new property acquisition or disposal by UCL Property.

5.0 **ASBESTOS MANAGEMENT AT UCL**  
The following section details how UCL meets its duties under the Control of Asbestos Regulations 2012.

5.1 **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.

Surveys at UCL are carried out by a licensed and UKAS accredited asbestos survey contractor. Surveys and re-inspections are carried out to standards set by HSE 264 Asbestos: The Survey Guide 2010

5.1.1 **Management surveys**  
UCL takes reasonable steps to establish if there are materials containing asbestos in it’s buildings by undertaking asbestos management survey’s (previously referred to as Type 2 Surveys) of those buildings where UCL 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 will form the basis on the Asbestos Management Plan.

5.1.2 **Refurbishment or Demolition Survey**  
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 the building or services.

This type of survey is used to locate as far as is reasonably practicable, all ACM in the building and will involve destructive inspection where necessary to gain access to all areas. A full sampling programme is undertaken to identify ACM and its content.

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

5.1.3 **Areas where UCL is not the duty holder**  
The Appointed Person Asbestos will monitor that where UCL is not the duty holder to ensure 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.
5.2 ASBESTOS RECORDS

UCL are required to make, 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.

An Asbestos Register Management System (ARMS) is maintained by the UCL Estates and supplemented with additional information gained during monitoring, investigation or annual re-inspection, and kept up to date to reflect the gradual removal of Asbestos Containing Material from UCL premises.

The ARMS is a computerised database system stored on the Estates network managed by the Appointed Person Asbestos. This database is fully accessible to all staff and students via the UCL website - http://www.ucl.ac.uk/estates/asbestos-register/

When asbestos removal or encapsulation works take place at UCL, the Appointed Person Asbestos must be provided with documentation from the asbestos removal company to confirm the removal has taken place; this must include a waste consignment note, area clearance notification and air monitoring records.

5.3 RISK ASSESSMENT

The ARMS risk assessment rating takes of a number of factors when assessment the risk of anyone being exposed to the fibres;

Material Assessment
1. Product Type - composites, boards, insulations
2. Extent of damage / deterioration - good condition, damaged
3. Surface treatment – composite materials, sprayed, sealed or encapsulated or unsealed
4. Asbestos Type – Chrysotile, Amphibole, Crocidolite

Priority Assessment
1. Normal Occupancy Level – rare user, low disturbance, high levels
2. Location, Accessibility & Extent
3. Human Exposure Potential – number of occupants, frequency of use, average time in the area

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

High Priority – Risk Assessment Score > 18 points
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 Score 13 to 18 points
Indicates ACM’s which require some action, encapsulating, sealing, enclosing or labelling. This asbestos would be removed as part of a phased programme.

Low Priority – Risk Assessment Score < 13 Points
Indicates ACM’s in good / fair condition, no significant health risk if left undisturbed during maintenance and work activities. Materials within the category will be inspected on a yearly basis to ascertain any chance in circumstances which could require reassessment of priority rating.
5.4 MANAGEMENT

The risks identified via the asbestos management surveys, must be managed to reduce them to an acceptable level as low as reasonably practical. The levels of management will dependant on the risk that the ACM presents.

UCL has the following management options;

5.4.1 Removal

ACM are removed as a result of one or more of the following:

- Identified as part of the on-going prioritised ACM removal programme
- ACM made accessible as part of a construction or refurbishment project
- ACM 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 not identified as part of an asbestos survey

Arrangements for the removal of ACM must be agreed by the Appointed Person Asbestos and the Project Manager with responsibility for the works involved. The Appointed Person Asbestos must review and approve the Safe System of Work 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 contractor. The ACM removal works must be managed by the Appointed Person Asbestos or an appointed competent person, time must be allowed for the planning and removal stages of the works and must take account of:

- Agreement on the scope of the works including waste disposal arrangements
- Contractors quotation, agreement of costing and assessment of method statement
- Statutory HSE notification period (14 days)
- Vacation of the work area (departmental staff, furniture and equipment)
- Isolation of 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.

5.4.2 Encapsulation or seal

ACM is encapsulated to contain and reduce the risk of ACM that can reasonably be left in place; an asbestos warning label must be applied to encapsulate ACM. Arrangements for the encapsulation of ACM must be agreed with the Appointed Person Asbestos or an appointed competent person, who will make the arrangements for the work and liaise with the departments involved.

5.4.3 Monitor – Annual Re-inspection

ACM that are in good condition can safely be left in-situ and monitored. To monitor and review the condition of identified ACM the Appointed Person Asbestos is responsible for an annual re-
inspection to be carried out by the UCL approved contractor; the ARMS database is updated with any alterations to drawings, data or risk assessment.

For asbestos products such as asbestos gaskets in plant rooms or mastic pads in kitchens. UCL will reduce the inspection period to a 2 yearly re-inspection.

5.4.4 Enclosed

Where an ACM is identified but can not 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 physical barrier.

5.4.5 Information, Instruction & Training

UCL 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. UCL carries out this duty in several ways;

- The ARMS database web based version is available to UCL members of staff and students with an appropriate UCL PC access address.
- The ARMS information and drawings are available to Estates team members via the Appointed Person Asbestos.
- Asbestos Training Courses – are available via the Safety Services Safety Training Unit to for staff with responsibilities for projects or works that may disturb ACM within the building fabric. All Estates project officers and maintenance staff and other who may undertake works which disturb asbestos must attend the course.
- Asbestos awareness - To raise asbestos awareness information about ACM and the AMP will be included in staff and student inductions. Information regarding asbestos management at UCL is held on the UCL web site.
- Controlling building maintenance activities – all work tickets issued to building maintenance contractors have a warning message to check the ARMS database before going to work
- The Appointed Person Asbestos will supply information from the ARMS database to contractors and consultants with the agreement of the appropriate UCL Project Officer.
- For large refurbishment projects information about ACM must be supplied to the Principal Contractor as part of the pre-contract health and safety information
- Asbestos Labelling – all known asbestos containing materials within UCL are labelled with one of these stickers. UCL also uses a yellow sticker with the Appointed Person Asbestos phone number on it.

5.4.7 Restrict Access
UCL ASBESTOS MANAGEMENT PLAN

UCL has the right to restrict access to an area should asbestos containing materials be identified that are high risk. The area will be restricted until remedial works can be undertaken to make the area safe.

5.4.8 Change of Use
Where an area has been identified as at risk of damaged the asbestos, it is possible to consider a change of use for the area so that we reduce the risk of damage and reduce the occupancy level to minimise the risk.

5.4.9 Safety System of Work
The risk of asbestos should be identified within an individuals risk assessment if it is presumed to be present within the building and this risk assessment should identify the necessary control measures and what to do in an emergency should asbestos be discovered.

6.0 EMERGENCY PROCEDURE AND INCIDENT REPORTING
UCL EMERGENCY PROCEDURE

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. REPORTED TO ONE OF THE FOLLOWING:
   a. UCL Customer Services
   b. Estates Appointed Person Asbestos

Source: HSE Asbestos Essentials EM1
6. **THE AREA MUST REMAIN UNOCCUPIED UNTIL INVESTIGATION BY THE APPOINTED PERSON ASBESTOS OR A COMPETENT PERSON.**

7. The Appointed Person Asbestos or the competent person attending 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 Appointed Person Asbestos or the competent person attending.

In a situation where a UCL competent person is unavailable a licensed asbestos contractor should be contacted to attend and manage the situation.

**Incident Reporting**

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

Where exposure occurs in an area under the control of a Principal Contractor the reporting will be the contractor’s responsibility.

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

UCL Safety Services will assess the requirements to report under the RIDDOR regulations.

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

**7.0 MONITORING & REVIEW**

This plan and arrangements will be annually reviewed, at changes in legislation or to include changes to UCL procedures to ensure they remain up to date.