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**Safety Standard**

# **Asbestos Management Plan**

**Version 10.0**

**8<sup>th</sup> of June 2023**

## Department Documentation Standards

### Version Control

Version	Date	Nature of Revision	Author	Approved By	Signed
1.0	15-02-05	First Issue	Ian Oram		HSMT
2.0	02-03-09	Revised to incorporate Control of Asbestos Regulations 2006	Peter Harrison		HSMT
3.0	30-07-10	Revised to merge policy and plan and provide clearer guidance on the asbestos management at UCL	Emma Shirbon Roy Capleton		HSMT
4.0	23-11-11	Revised to <ul style="list-style-type: none"> <li>reflect integration of post graduate institutes</li> <li>new structure in UCL Estates</li> <li>name change from HSMT to HSC</li> </ul>	Emma Shirbon		HSC
5.0	06-04-12	Revised to reflect change in legislation; Control of Asbestos Regulations 2012	Richard Elliott Derek Wood		HSC
6.0	04-09-12	Revised to reflect additional duty holder responsibilities to ensure UCL Asbestos Register is always up to date	Richard Elliott		HSC
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8.1	23-02-18	Estates notice attached to page 1 detailing new appointed person and AMP under review.	Tara Kelly		TLK
9.0	27.10.21	Complete Review and Rewrite	Jane Adamson	Mike Sheppard	
10.00	08.06.23	Review following asbestos compliance audit.	Jane Adamson	WHSC	JA

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## 1.0 Introduction

University College London recognises its 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. This Asbestos Management Plan (AMP) has been produced to apply to **all** buildings constructed prior to 2000 for which UCL is responsible for maintenance and repairs. Effective implementation of this AMP will control the risks to students, staff, and visitors.

UCL own, lease, use, or operate in a diverse property portfolio of approximately 250 buildings, the majority is geographically located within the Bloomsbury area of central London. A full list of buildings in which UCL manages asbestos is held by UCL Estates team.

UCL are not responsible for managing asbestos in NHS Trust buildings or in leased buildings where UCL do not have maintenance responsibility.

For projects that are notifiable under the Construction (Design and Management) Regulations 2015 (CDM) this AMP shall not apply for the area and period defined within the F10 notification. A separate AMP must be documented by the Principal Contractor (PC) for the area under such circumstances for the duration of the notification period.

## 2.0 Purpose

Identified, well managed and encapsulated ACMs present a minimal risk. UCL strive to operate a fully asbestos safe environment for staff, contractors, students and members of the public using UCL premises. Until such a point is reached UCL identify, and using a risk-based strategy, control the risks of asbestos materials to the lowest practicable levels.

The Purpose of this AMP is to set out the arrangements and responsibilities to manage asbestos across the UCL property portfolio. It is intended to provide information in order to prevent asbestos exposure of staff, contractors, students and members of the public using UCL premises.

Furthermore, UCL will also achieve compliance with the Health and Safety at work act 1974 (HSWA), the Control of Asbestos Regulations 2012 (CAR) and the Management of Health and Safety at Work Regulations 1999 (MHSWR), in relation to asbestos.

## 3.0 Responsibilities

Operational responsibility is delegated as described in the following sections.

**ALL STAFF AND CONTRACTORS** have a duty to cooperate with the Principal Asbestos Safety Manager and must comply with the following:

- Avoid disturbing asbestos.
- Do not start work affecting the fabric of a building until the potential for disturbing asbestos and the asbestos register has been adequately assessed and a permit to work / authorisation has been issued and approved by the University Project Officer

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- Provide information on asbestos to staff and contractors they are responsible for by consulting the Asbestos Register and / or contacting the Principal Asbestos Safety Manager
- Ensure the University emergency asbestos procedures are followed in the event of discovery of or damage to ACM or suspected ACM
- Report to the Asbestos Team / Safety Services immediately and stop work if damaged or disturbed known or suspected ACM is encountered and call customer services on 30000.
- Attend asbestos awareness training every year where required.

**3.1 The President and Provost** is the Duty Holder for the oversight of asbestos management. The President and Provost is responsible to the UCL Council and have constituted the Health & Safety Committee to plan and implement health and safety policy.

**3.2 The Director of Campus Infrastructure and Operations** is responsible for creating a strategy and budget allocation for asbestos management, ensuring that sufficient resources and expertise are available.

**3.3 Assistant Director of Compliance and Performance** is responsible for appointing and managing a competent Principal Asbestos Safety Manager as the “Appointed Person (Asbestos)”. The Principal Asbestos Safety Manager should have a minimum training qualification of British Occupation Hygiene Society (BOHS) certified competent person or equivalent. They are also responsible for appointing other required resources including the Approved Asbestos Consultant and Approved Licensed Asbestos Removal Contractors (LARCs).

**3.4 The Principal Asbestos Safety Manager “Appointed Person (Asbestos)”** has day to day responsibility as operational lead for asbestos management across UCL including the following:

- Implementation of the Asbestos Management Plan
- Establish emergency procedures to deal with any unplanned/uncontrolled disturbance of ACM at UCL
- Monitor, audit and review the UCL asbestos register and arrange management asbestos surveys and re-inspections surveys as appropriate
- Provide information and advice about ACMs to Estate and departmental project managers 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 of works
- Request asbestos survey information from UCL Property for all new property acquisitions and provide asbestos register information to UCL Property for all property disposals
- Act as Contracts Manager to the Asbestos Consultant and the Appointed Licensed Asbestos Removal Contractor

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**3.5 Deputy Asbestos Safety Manager** supports the Principal Asbestos Safety Manager and is responsible for day-to-day support for asbestos enquiries, auditing, quality assurance and incident investigation management, including the following.

- Monitor, audit and review the UCL asbestos register and arrange management asbestos surveys and re-inspections surveys as appropriate.
- Manage CEMAR: progression of costs, raising Task Orders and contract administration support.
- Manage incidents / RiskNet. Provide a first response to reports/notifications of non-compliance, investigate, and establish causes of failure and co-ordinate appropriate remedial actions.
- Provide information and advice about ACMs to Estate and departmental project managers involved in works that may disturb ACM within UCL buildings
- Engage and organise asbestos remediation with asbestos removal contractor and air testing with the consultant.
- Checking RAMS for Compliance Works and for UPO's if required.
- Undertake audits of asbestos removal projects and Infobrick inspections.

**3.6 The Approved Asbestos Consultant** is responsible for providing priority responses and co-ordinating appropriate remedial actions for asbestos and suspected asbestos incidents. They are also responsible for providing all testing and inspection services (surveying, sampling and analysis including air testing and 4 stage clearance) as required by this AMP, including asbestos consultancy, project management of asbestos abatement and updating of the AMS following surveys, re-inspections, bulk samples and asbestos abatement. They are required to attend and input into regular asbestos management progress meetings and assist the Principal Asbestos Safety Manager with managing the Licensed Asbestos Removal Contractor. A detailed specification for the Asbestos Consultant duties is contained the official contract (copies may be obtained from the Principal Asbestos Safety Manager on request).

**3.7 The Approved Licensed Asbestos Removal Contractor (LARC)** is responsible for attending site within 120 minutes in the event of an asbestos or suspected asbestos emergency. They are also responsible for conducting all work with asbestos on UCL sites, licensed and unlicensed in accordance with CAR and all associated guidance and best practise. Where asbestos abatement forms the majority of the work the LARC may be required to fulfil the roll of Principal Contractor (PC) under CDM. The LARC is required to provide all necessary documentation to the Principal Asbestos Safety Manager on request and without delay (e.g. ASB5 and / or F10 notification forms, Risk Assessments and Method Statements (RAMS), generic procedures, waste consignment notes, equipment, training and health monitoring records, etc.).

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The LARC must cooperate with the Principal Asbestos Safety Manager or the Deputy Asbestos Safety Manager and University Project Officers in planning works and must observe all university permit and approval requirements prior to starting work. They must attend and pro-actively cooperate with management and review meetings. All LARC staff are required to have standard DBS checks and provide these to the Principal Asbestos Safety Manager before an employee starts work at UCL. A detailed specification for the Licenced Asbestos Removal Contractors duties is contained in the official contractor (copies may be obtained from the Principal Asbestos Safety Manager on request).

**3.8 UCL Staff** that manage contracts or works must consult with the Principal Asbestos Safety Manager or the Deputy Asbestos Safety Manager before commencing a project in a building constructed prior to 2000. They should check available information on the AMS and where necessary instruct additional survey work. They should arrange any necessary asbestos remediation required for the project, instructing the LARC and Approved Consultant as described herein. For CDM projects they must ensure that sufficient pre-construction phase asbestos information is made available to the PC and Principal Designer (PD) in a timely manner. They must ensure that asbestos risk has been properly considered prior to starting work and that all staff and contractors are aware of the location of asbestos materials and the emergency procedure (Section 10 of this AMP) to be adopted in the case of uncontrolled disturbance of asbestos or suspected asbestos. It is the responsibility of the UCL Estates Projects, Project Manager's & Project Officers to arrange for the asbestos management system and asbestos register to be updated during asbestos or construction activities as appropriate.

**3.9 Contractors (and staff appointing contractors)** working at UCL must comply with this AMP. They have specific duties to check that asbestos will not be disturbed during works and to ensure that staff have received up to date asbestos awareness training and suitable asbestos information relating to the tasks they are carrying out. In the event of uncontrolled disturbance of asbestos or suspected asbestos the emergency procedure must be followed, and the Principal Asbestos Safety Manager or Deputy Asbestos Safety Manager must be informed immediately.

**3.10 UCL Facilities and Infrastructure Operation and Maintenance Personnel** are responsible for checking the AMS and carrying out risk assessments before undertaking any work in properties. They must notify the Principal Asbestos Safety Manager or Deputy Asbestos Safety Manager, and cease work, if damaged or disturbed known or suspected ACMs is encountered.

**3.11 UCL Safety Services** – when required the Principal Asbestos Safety Manager may engage the help of Safety Service to investigate an incidence of uncontrolled disturbance of asbestos, producing a report for the Health and Safety Committee. Where appropriate they will also report an incident to the HSE under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR). They are also responsible for notifying Occupational Health Services where any member of staff that has been involved in any asbestos exposure incident.

**3.12 UCL Estates - Property Services Team** are responsible for obtaining adequate information about the presence of ACM for all properties purchased. Where information is not adequate an asbestos survey must be carried out prior to exchange of contracts. They are also responsible for providing asbestos survey and register information to the Principal

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Asbestos Safety 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.

**3.13 UCL Estates – Property CAD Manager** is responsible for informing the Principal Asbestos Safety Manager of any changes to the building register following acquisition or sale. They will also advise on any building layout changes and provide updated plans.

**3.14 UCL Occupational Health Department** are responsible for providing occupational health advice to management and staff on issues relating to asbestos and recording asbestos exposure information on the employee's medical notes. The medical notes are to be retained for forty years.

## 4.0 Asbestos Information

Information about the known asbestos items across the portfolio (the asbestos register) is made available to all staff and selected framework contractors electronically via the asbestos management system (AMS), this may be accessed from the UCL intranet. The asbestos register contains information on the location of asbestos containing materials and holds risk assessment data for each item along with a planned action for its safe management. In order to obtain access please contact the Principal Asbestos Safety Manager or the Deputy Asbestos Safety Manager to set permissions. If access to the AMS is not directly available, then information must be requested in advance from the Principal Asbestos Safety Manager or the Deputy Asbestos Safety Manager

Where work is planned in a building or area where UCL are not the duty holder the Building Manager or Property Team may be able to advise whether they have access to asbestos information or if not who to contact to obtain information.

### 4.1 Management Asbestos Surveys

The Principal Asbestos Safety Manager will ensure that a Management Asbestos Survey or equivalent has been conducted by the approved asbestos consultant for all buildings for which UCL is the duty holder, and that the information is made available via the AMS. Any areas that have not been surveyed must be presumed to contain asbestos and work in those areas must be controlled accordingly. In such circumstances the Principal Asbestos Safety Manager should be contacted in writing for guidance ahead of the works.

It is important to understand that a Management Asbestos Survey is largely non-destructive and so will usually only assess the easily accessible elements of a building and so may not consider areas such as above fixed ceilings or behind wall coverings or inside plant etc.

### 4.2 Reinspection Asbestos Surveys

The Principal Asbestos Safety Manager is responsible for ensuring that known asbestos items are regularly monitored, this is achieved by arranging for the approved asbestos consultant to inspect each asbestos item and update the risk assessments, management actions and any other details as appropriate. This shall typically be conducted every twelve months, but the frequency may be increased or decreased based upon risk analysis. When remediation or removal of asbestos is carried out, the AMS will be updated on completion of work to reflect the new status.

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### 4.3 Refurbishment / Demolition Asbestos Surveys

Where intrusive work is planned that may affect areas beyond the surfaces that are usually accessible during normal occupation of a building, unless detailed existing information is already available, it will usually be necessary to conduct a more intrusive survey that accesses **all** areas that will be affected during the planned works (including service and access routes etc.). A clear scope must be documented prior to asking the approved consultant to conduct a refurbishment / demolition survey. Information obtained during these surveys should be added to the AMS as with a management survey.

### 4.4 Asbestos Bulk Sampling

For very limited work a bulk sample of a suspect material may be undertaken. The Principal Asbestos Safety Manager is the sole authority on whether further investigation work is required and must be consulted prior to works proceeding based on bulk sample information.

## 5.0 Projects

UCL is responsible for ensuring that suitable and sufficient information in relation to asbestos that may be affected by the works is provided to those conducting the works. Where any intrusive work is planned in a building constructed prior to 2000 the Principal Asbestos Safety Manager or the Deputy Asbestos Safety Manager must be consulted. UCL require ACMs to be removed as part of project works where it is reasonably practicable to do so.

*Should a project plan to leave any ACMs in situ, approval must be sought from the Principal Asbestos Safety Manager or Deputy Asbestos Safety Manager at the planning stage.*

### 5.1 Minor works

Where minor works such as routine maintenance, cleaning or re-decoration are undertaken a risk assessment (including asbestos risk) must be undertaken by those conducting the works. This will involve consulting the AMS to determine if any asbestos materials could be disturbed during the work and whether asbestos abatement is required in advance. Where there is any doubt that the asbestos survey was sufficiently intrusive to cover the works the Principal Asbestos Safety Manager or Deputy Asbestos Safety Manager must be consulted. If necessary, the University Project Officer must arrange for a new asbestos survey to be conducted by the Approved Consultant.

### 5.2 Major Works / Intrusive Works

Where more significant or intrusive work is undertaken such as a major refurbishment, demolition, or partial demolition a management survey is very unlikely to suffice in facilitating effective asbestos risk management. Unless a previous refurbishment or demolition survey is available that covered all areas affected, all planned work activities and was sufficiently intrusive then the University Project Officer must arrange for a new survey to be conducted by the Approved Consultant. Intrusive work includes all demolition or breaking out, forming openings (of any size) in walls, floors, and ceilings, opening up ducts, boxing or voids, lifting of coverings etc.

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### 5.3 CDM Notifiable Projects

Where a project is notifiable under CDM this AMP will not apply to the area defined by the F10 notification for the period covering the date that the notification becomes live to the date that the notification no longer applies. During this period the PC is responsible for asbestos management in that area and must document their own AMP to lay out how asbestos will be safely managed during the project as part of the construction phase plan and health and safety file.

UCL has a specific duty under CDM to provide suitable and sufficient information on asbestos risk from their asbestos register. In agreement with the PD and / or PC, UCL may request that an asbestos survey is procured on UCLs behalf at the pre-construction stage. However, the legal duty to ensure that the information is provided remains with UCL and so the University Project Officer must ensure that where necessary, the survey is completed and disseminated.

This will mean that the PC may choose to employ their own preferred asbestos consultant for conducting refurbishment / demolition asbestos surveys and their own preferred LARC for asbestos abatement. However, the PC is required to use the UCL Approved Asbestos Consultant to conduct all air monitoring and 4 stage clearance testing during the project. The University Project Officer will issue an order direct to the Approved Consultant for this element of the work.

The PD and PC are required to make copies of any asbestos survey or bulk sample reports generated as part of the project available to the Principal Asbestos Safety Manager as soon as they become available. Similarly copies of all ASB5 notifications and LARC plans of work (for both licensable and non-licensable work) should be provided to the Principal Asbestos Safety Manager as soon as they are available.

At the end of the notifiable period the PC and PD must supply the Principal Asbestos Safety Manager or Deputy Asbestos Safety Manager with an updated asbestos register for the area, detailing what asbestos has been removed or remediated and what asbestos remains. In addition, they must make arrangements to update the asbestos management system and register.

## 6.0 Asbestos Risk Management Strategy

The asbestos register details all identified asbestos containing materials including an assessment of their risk. Asbestos is assessed for condition status on a regular basis. A risk-based approach determines priority levels for treatment.

A list of restricted high-risk areas can be found on the 'Asbestos Locked Down Areas Memo'. This can be obtained from the Principal Asbestos Safety Manager or the Deputy Asbestos Safety Manager.

The Management actions shall be one of the following choices:

### 6.1 ACM risk-based actions

**6.1.1 Manage in situ:** ACMs in safe condition and unlikely to be disturbed they shall be left in situ and statutory re-inspected at regularly intervals determined by the Principal Asbestos Safety Manager in conjunction with the appointed Asbestos Consultant.

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**6.1.2 Remediate:** ACMs with minor damage and unlikely to be disturbed may be repaired and sealed. This is suitable where the material requires limited work such as encapsulation to improve its condition to a “Manage” state.

**6.1.3 Remove:** Where effective repair to the ACM cannot be achieved, or where the ACM is in poor condition, or the ACM is located in a position generating significant risk of damage and should be removed.

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

## 6.2 Asbestos in Equipment

Asbestos containing materials may have been used as components within plant, machinery, or work equipment that can be found within buildings for which the University has responsibility, where it was safe to inspect and sample suspect materials of this nature the detail will be included within the building asbestos records. It may not have been possible to identify all items of this nature during the management survey as pieces of plant, machinery or equipment may have been live, in use or stored. In these instances it must be presumed that asbestos is present until its absence can be confirmed via suitable inspection when the item is no longer live or in use.

Where any plant, machinery or work equipment is to be disposed of and no information relating to asbestos can be found, the Principal Asbestos Safety Manager must be informed and if deemed necessary appropriate checks and arrangements can be made for its safe disposal.

For other non-fixed equipment owned or managed by departments and are suspected to contain Asbestos Containing Materials (e.g., ovens, laboratory equipment, etc.) these should be declared so that an assessment can be undertaken and appropriate action taken including adding to the asbestos register.

## 6.3 Asbestos Labelling

Warning labels or appropriate signage may be applied to ACMs considered to be a significant risk, in order to help prevent accidental damage, and not cause undue concern. Not all ACMs will be labelled.

Example of Asbestos Label:



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**Lower risk materials such as floor tiles, textured coatings, and cement materials may not be routinely labelled.**

## 7.0 Asbestos Remediation

The requirement for asbestos remediation will normally be identified during an asbestos survey or re-inspection, this will be captured as an action within the AMS and will remain on the system until it has been completed. Required actions may involve removal of asbestos, enclosure (physical barrier, encapsulation (surface seal) or labelling with warning labels. Other circumstances that may require asbestos remediation may be the planned change of use of an area, planned works or other sensitivities.

It is unlikely to be possible to conduct all the required remediation immediately due to budgetary or operational constraints, Material Assessment and Priority Assessment scores are added together within the AMS to give a total risk score of between zero and twenty-four, the higher the score the higher the risk of exposure to occupants. This total risk score will form the basis of prioritisation for deciding which items are remediated first.

Asbestos remediation will be initiated and controlled by a University Project Officer with assistance from the Principal Asbestos Safety Manager or the Deputy Asbestos Safety Manager, the appointed asbestos consultant will produce a scope and specification for the work and a UCL approved LARC will be selected to conduct the work by using the tender package agreed during the LARC procurement process. For all licensable work the Approved Consultant must be present daily whilst the area is live, to conduct site quality management and leakage and personal air testing. They will also conduct a 4-stage clearance (4SC) once work is complete. The University Project Officer will issue work orders to the LARC to complete the abatement and to the Approved Consultant to provide project management of the work and conduct the air monitoring and inspection as specified by the Principal Asbestos Safety Manager. On completion of the work the Approved Consultant will compile a completion pack containing as a minimum the scope and specification document, the LARC plan of work, air monitoring and inspection paperwork (including 4SC where required) and waste consignment notes). This completion pack will be appended to the AMS for retention.

## 8.0 Training

All staff that may disturb asbestos in their roles at UCL or control the work of others that may disturb asbestos, must attend asbestos awareness training in compliance with CAR regulation 10. This includes Estates Project Officers, operational staff, maintenance staff and others who may undertake works which disturb asbestos. As a minimum staff should receive initial asbestos awareness training within 6 months of starting work. Following this they should receive refresher training annually.

### 8.1 Training Management

Asbestos awareness training will be arranged by the Principal Asbestos Safety Manager or the Deputy Asbestos Safety Manager in conjunction with the appointed Asbestos Consultant who will also maintain training records and track when refresher training is required. Refresher training may be conducted online.

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## 8.2 UCL Contractor Training

All UCL contractor staff that may disturb asbestos in their roles at UCL also require asbestos awareness training. This must be provided by their employer. UCL will specify at contract procurement stage where awareness training is required.

## 8.3 Bespoke Training

From time to time it may be necessary for UCL or contractor staff to access an area with an elevated asbestos risk using additional personal protective equipment. As appropriate the Approved Consultant may be required to conduct a job specific induction or bespoke training on how the task is to be completed and understanding the risks involved prior to work starting.

## 8.4 AMS Training

Self-training materials on how to use the AMS are available on the UCL intranet, in the event that an individual is unable to access the information they require after reading the training material they should contact their line manager who will arrange an informal peer training session.

## 9.0 Review

The performance of this AMP in safely managing asbestos across the UCL portfolio will be reviewed to record and highlight issues encountered and identify where improvements can be made, the following approach will be adopted.

### 9.1 AMP Implementation Audits

Two yearly audits on the implementation of this AMP will be conducted by a competent external consultant, providing a report to the Director of Campus Infrastructure and Operations.

### 9.2 Asbestos Review Meetings

Performance of the asbestos management regime will be discussed annually at a review meeting to be chaired by the Director of Campus Infrastructure and Operations.

The aim of the review meetings is to identify any serious problems for urgent action and to consider improvements that may be made.

The following information will be presented at the meeting:

- Status of asbestos management information (number of buildings without a survey)
- Number of outstanding items requiring re-inspection
- Number of outstanding asbestos abatement actions across the portfolio
- Significant contractor performance issues
- Number and summary of emergency incidents or unforeseen disturbances of asbestos

### 9.3 AMP Review

This AMP will be reviewed at least annually to check that it is still relevant and fit for purpose. The review will be initiated by the Director of Campus Infrastructure and

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Operations and will be conducted on his behalf by the Principal Asbestos Safety Manager or another competent person. In the event that circumstances affecting this AMP change significantly it will be reviewed immediately. Where changes are required, they will be included in the reviewed AMP.

#### **9.4 Consultation with Employees**

Consultation with employees and trade unions is conducted via the UCL existing safety committee structure.

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## 10.0 Emergency Procedure and Process Chart

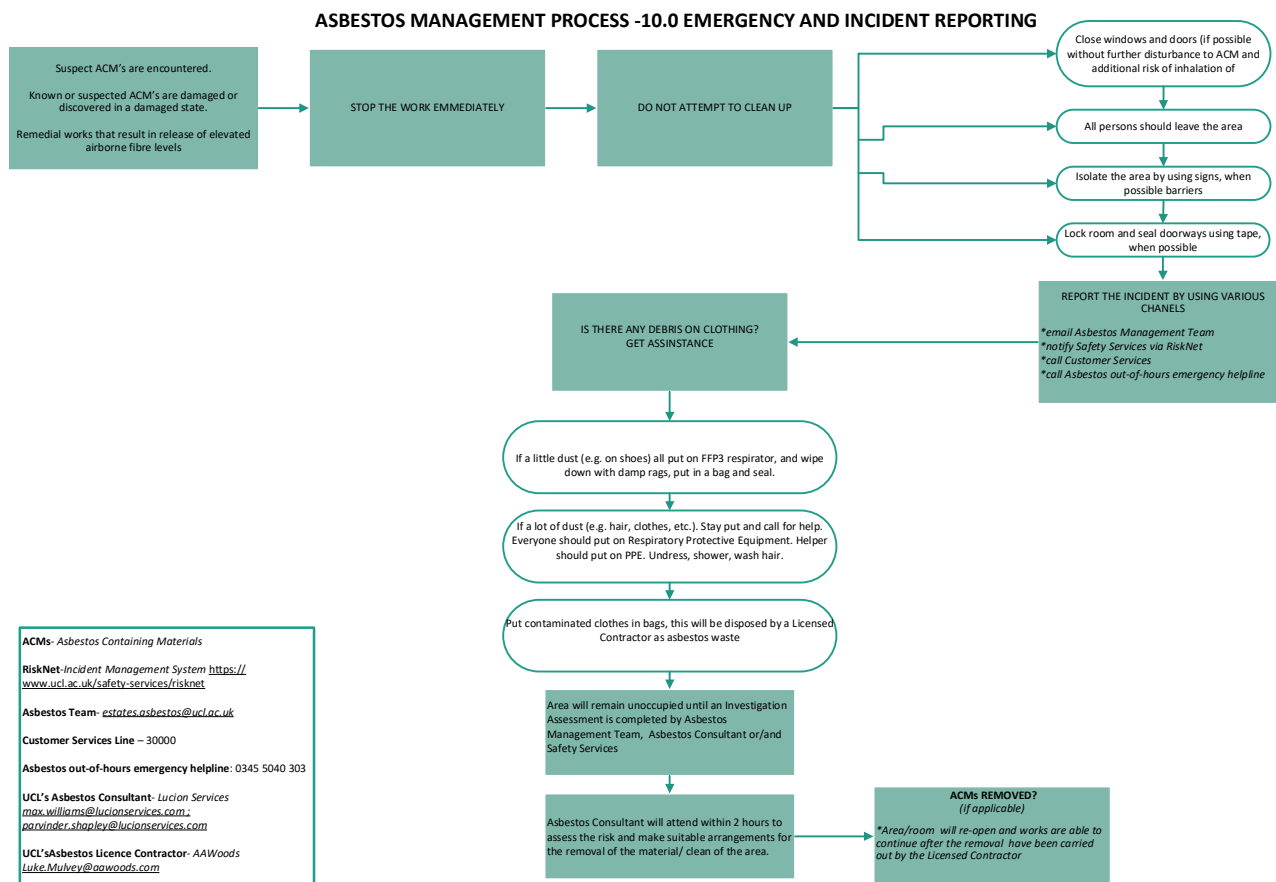
Document:	Asbestos Management: 10.0 Emergency Procedures and Incident Reporting		
Reviewer:	Jane Adamson	Date:	08/06/2023
Line Managers	Director of Campus Infrastructure and Operations		
Department	UCL Campus Infrastructure and Operations-Compliance and Performance		
<b>Summary:</b> This Process is to be adopted by anyone at UCL where: <ul style="list-style-type: none"><li>Suspect ACMs are encountered.</li><li>Known or suspected ACMs are damaged or discovered in a damaged state.</li><li>Remedial works that result in release of elevated airborne fibre levels.</li></ul> <p>Everyone at UCL who is authorised to instruct works (UPO) is required to complete a basic online Asbestos Awareness Training. Upon completion, you will be issued with a certificate valid for a year. The refresher of this training course must be completed annually.</p> <p>Contractors staff members who are carrying out works in UCL’s Buildings must also have an Asbestos Awareness Training</p> <p><u>Please contact the Asbestos Management Team to provide you with access and complete this training course if you haven’t by now.</u></p>			
Step No.	Step		
1.	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		
2.	STOP THE WORK IMMEDIATELY		
3.	Do not attempt to clean up <ul style="list-style-type: none"><li>a) Close windows and doors (if possible, without further disturbance to ACM and additional risk of inhalation of fibres)</li><li>b) All persons should leave the area</li><li>c) Isolate the area by using signs, when possible, barriers</li><li>d) Lock room and seal doorways using tape, when possible</li></ul>		
4.	Report the incident by using various channels: <ul style="list-style-type: none"><li>a) Email Asbestos Management Team <a href="mailto:estates.asbestos@ucl.ac.uk">estates.asbestos@ucl.ac.uk</a></li><li>b) Notify Safety Services via RiskNet <a href="https://www.ucl.ac.uk/safety-services/risknet">https://www.ucl.ac.uk/safety-services/risknet</a></li><li>c) Call Customer Services on 30000</li><li>d) Call Asbestos out-of-hours emergency helpline: 0345 5040 303</li></ul>		

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5.	<b>Is there any debris on clothing? Get assistance</b> <ul style="list-style-type: none"> <li>a) If a little dust (e.g., on shoes) all put on FFP3 respirator, and wipe down with damp rags, put in a bag and seal.</li> <li>b) If a lot of dust (e.g., hair, clothes, etc.). Stay put and call for help. Everyone should put on Respiratory Protective Equipment. Helper should put on PPE. Undress, shower, wash hair.</li> <li>c) Put contaminated clothes in bags, this will be disposed by a Licensed Contractor as asbestos waste</li> </ul>
6.	<b>Area will remain unoccupied until an Investigation Assessment is completed by Asbestos Management Team, Asbestos Consultant or/and Safety Services</b>
7.	<b>Asbestos Consultant will attend within 2 hours to assess the risk and make suitable arrangements.</b> <ul style="list-style-type: none"> <li>a) Carry out Air monitoring, sampling and analysis of the suspect material or arrangements for the removal of the material and a clean of the area.</li> <li>• <i>Suspect contaminated areas must remain out of bounds until cleared by the Asbestos Management Team/approved Asbestos Consultant</i></li> </ul>
8.	<b>All Stakeholders are to be kept informed throughout this process</b> <ul style="list-style-type: none"> <li>• <i>The Investigation Assessment and Results will be captured in RiskNet, including any lessons learned.</i></li> </ul>
9.	<b>ACMs Removed (if applicable)?</b> <ul style="list-style-type: none"> <li>• <i>Area/Room will re-open, and works are able to continue after the removal have been carried out by the Licensed Contractor</i></li> </ul>
	<b>Contacts</b> <ul style="list-style-type: none"> <li>• Asbestos Management Team: <a href="mailto:estates.asbestos@ucl.ac.uk">estates.asbestos@ucl.ac.uk</a></li> <li>• Asbestos Consultant (Lucion-Contract Manager) <a href="mailto:max.williams@lucionservices.com">max.williams@lucionservices.com</a></li> <li>• Asbestos Embedded Consultant (Lucion-Technical Consultant) <a href="mailto:parvinder.shapley@lucionservices.com">parvinder.shapley@lucionservices.com</a></li> <li>• Asbestos Licenced Contractor (AAWoods) <a href="mailto:Luke.Mulvey@aawoods.com">Luke.Mulvey@aawoods.com</a></li> </ul>

## ASBESTOS MANAGEMENT PROCESS -10.0 EMERGENCY AND INCIDENT REPORTING



## 11.0 Contact Details

<b>UCL Principal Asbestos Safety Manager</b>	Jane Adamson <a href="mailto:jane.adamson@ucl.ac.uk">jane.adamson@ucl.ac.uk</a> 07841 443456
<b>UCL Deputy Asbestos Safety Manager</b>	Florentina Caras <a href="mailto:f.caras@ucl.ac.uk">f.caras@ucl.ac.uk</a> 07741 671 336
<b>Asbestos Consultants – Lucion Environmental</b>	
<b>Asbestos Embedded Consultant</b>	Parvinder Shapley <a href="mailto:parvinder.shapley@lucionservices.com">parvinder.shapley@lucionservices.com</a> 07710976964

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Asbestos Emergency Out of Hours Number	08450344326
<b>Appointed Licensed Asbestos Removal Contractors:</b>	
AA Woods Emergency Support Number	07880192937
AA Woods – Main Contact	Luke Mulvey 0844 576 0328
Ductclean UK Limited t/a DCUK FM – Main Contact	Mark Stottor 0330 124 5671

## 12.0 Glossary of Terms

<b>Duty holder</b>	Every person who has, by virtue of a contract or tenancy, an obligation of any extent in relation to the maintenance or repair of non-domestic premises or any means of access or egress to or from those premises.
<b>Asbestos Management Plan (AMP)</b>	A document or documents that set out arrangements for the safe management of asbestos containing materials.
<b>ACMs</b>	Asbestos Containing Materials
<b>AMS</b>	Asbestos Management System. NexGen is the current AMS at UCL which stores all asbestos information including material risk assessments, surveys, remediation and air testing information, plus master asbestos drawings.
<b>Management Asbestos Survey</b>	A management survey is the standard survey. Its purpose is to locate, as far as reasonably practicable, the presence and extent of any suspect ACMs in the building which could be damaged or disturbed during normal occupancy, including foreseeable maintenance and installation, and to assess their condition. The survey involves limited intrusion into the building fabric but does not usually involve destructive access into voids or behind sealed panels or ceilings.
<b>Refurbishment and Demolition Asbestos Survey</b>	A refurbishment and demolition 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 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 and 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 dismantling.
<b>CAR</b>	Control of Asbestos Regulations
<b>LARCs</b>	Licensed Asbestos Removal Contractors
<b>CDM</b>	Construction (Design and Management) Regulations
<b>PC &amp; PD</b>	Principal Contractor & Principal Designer

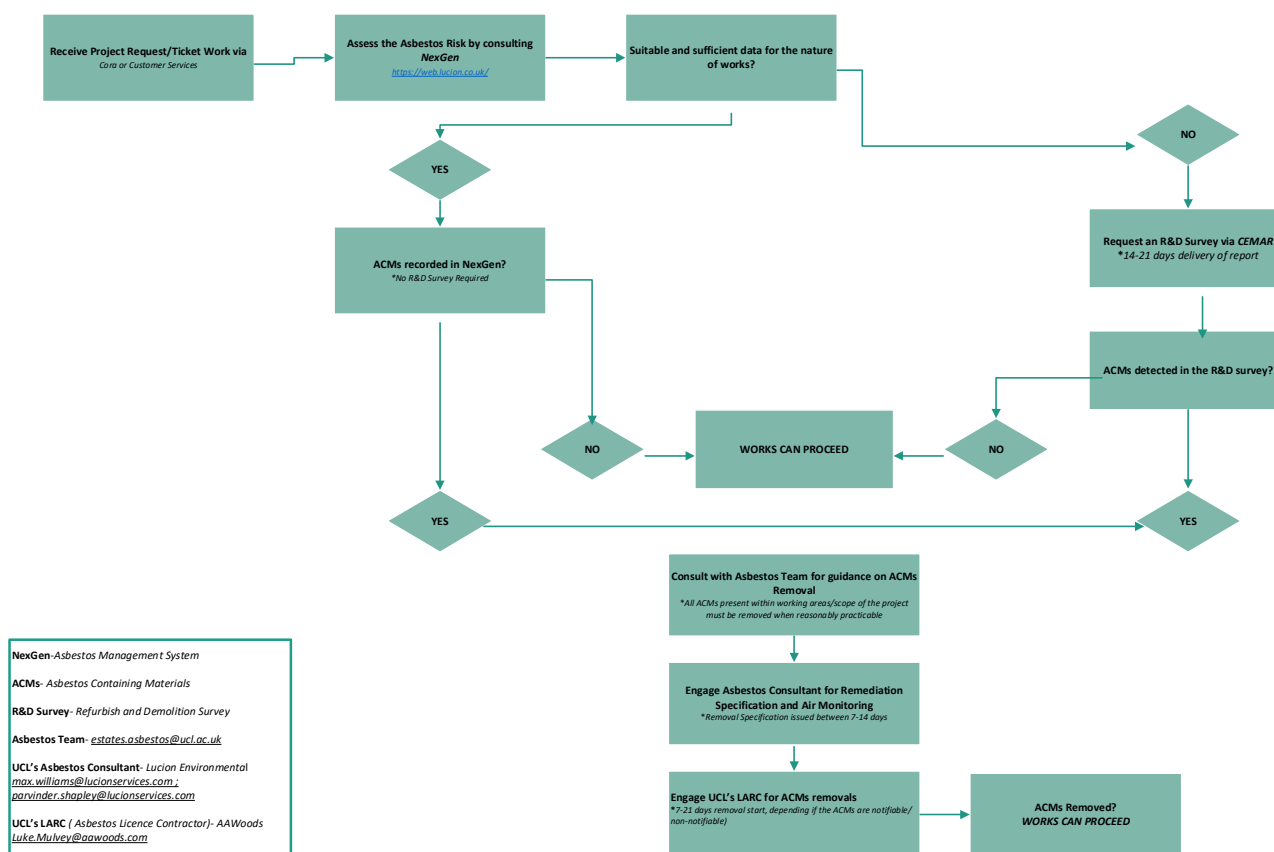
## 13.0 Supporting Procedural Documentation

### 5.1 Minor works

<b>Document:</b>	<b>Asbestos Management Process: 5.1 Minor Works</b>		
<b>Reviewer:</b>	Jane Adamson	<b>Date:</b>	08/06/2023
<b>Line Managers</b>	Director of Campus Infrastructure and Operations		
<b>Department</b>	UCL Campus Infrastructure and Operations-Compliance and Performance		
<p><b>Summary:</b></p> <p>Where minor works such as routine maintenance, cleaning or re-decoration are undertaken a risk assessment (including asbestos risk) must be undertaken by those conducting the works. This will involve consulting the Asbestos Register to determine if any asbestos materials could be disturbed during the work and whether asbestos abatement is required in advance.</p> <p>Where there is any doubt that the asbestos survey was sufficiently intrusive to cover the works the Asbestos Management Team must be consulted. If necessary, the University Project Officer must arrange for a new asbestos survey to be conducted by the Approved Consultant: Lucion Services</p> <p><i>Everyone at UCL who is authorised to instruct works (UPO) is required to complete a basic online Asbestos Awareness Training. Upon completion, you will be issued with a certificate valid for a year. The refresher of this training course must be completed annually.</i></p> <p><i>Contractors staff members who are carrying out works in UCL's Buildings must also have an Asbestos Awareness Training</i></p> <p><i><u>Please contact the Asbestos Management Team to provide you with access and complete this training course if you haven't by now.</u></i></p>			
<b>Step No.</b>	<b>Step</b>		
1.	Receive Project Request/Ticket Work Instruction via various channels depending on the nature of the works		
2.	Assess the Asbestos Risk by checking the Asbestos Register ( NexGen) for details: <a href="https://web.lucion.co.uk/">https://web.lucion.co.uk/</a> <ul style="list-style-type: none"> <li>E.g., Tasks: Replace door handle, decoration, mechanical maintenance task</li> </ul>		
3.	Suitable and sufficient asbestos data in the Asbestos Register for the nature of the works? a) YES, no further survey required b) NO, request an R&D Survey via CEMAR (14-21 days survey delivery of report)		
4.	Any ACMs detected in the R&D survey report or known and recorded in the Asbestos Register? a) YES, engage Asbestos Consultant for Remediation Specification and Air Monitoring (Remediation Specification issued between 7-14 days)  b) YES, engage the LARC for ACMs removals below <ul style="list-style-type: none"> <li>7-21 days removal start, depending on if ACMs are notifiable/ non-notifiable</li> <li>All asbestos related services are submitted via CEMAR and under Asbestos Management Team's assistance when required</li> </ul>		

	<ul style="list-style-type: none"> <li>All ACMs present within working areas/scope of the project must be removed when reasonably practicable</li> </ul>
5.	ACMs removed from the working area? a) Obtain Certificate of Occupancy from Lucion Services or download it from NexGen b) Project or task instructed works can proceed
6.	<b>Contacts</b> <ul style="list-style-type: none"> <li>Asbestos Management Team: <a href="mailto:estates.asbestos@ucl.ac.uk">estates.asbestos@ucl.ac.uk</a></li> <li>Asbestos Consultant (Lucion-Contract Manager) <a href="mailto:max.williams@lucionservices.com">max.williams@lucionservices.com</a></li> <li>Asbestos Embedded Consultant (Lucion-Technical Consultant) <a href="mailto:parvinder.shapley@lucionservices.com">parvinder.shapley@lucionservices.com</a></li> <li>Asbestos Licenced Contractor (AAWoods) <a href="mailto:Luke.Mulvey@aawoods.com">Luke.Mulvey@aawoods.com</a></li> </ul>

## ASBESTOS MANAGEMENT PROCESS-5.1 MINOR WORKS



## 5.2 Major Works / Intrusive Works

Document:	Asbestos Management Process: 5.2 Major and Intrusive Works Procedures		
Reviewer:	Jane Adamson	Date:	08/06/2023
Line Managers	Director of Campus Infrastructure and Operations		
Department	UCL Campus Infrastructure and Operations-Compliance and Performance		
<b>Summary:</b>			
Where more significant or intrusive work is undertaken such as a major refurbishment, demolition, or partial demolition a management survey is very unlikely to suffice in facilitating effective asbestos risk management. Unless a previous refurbishment or demolition survey is available that covered all areas affected, all planned work activities and was sufficiently intrusive then the University Project Officer must arrange for a new survey to be conducted by the Appointed Consultant. 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.			
<i>Everyone at UCL who is authorised to instruct works (UPO) is required to complete a basic online Asbestos Awareness Training. Upon completion, you will be issued with a certificate valid for a year. The refresher of this training course must be completed annually.</i>			
<i>Contractors staff members who are carrying out works in UCL's Buildings must also have an Asbestos Awareness Training</i>			
<i><u>Please contact the Asbestos Management Team to provide you with access and complete this training course if you haven't by now.</u></i>			
<b>Step No.</b>	<b>Step</b>		
1.	<b>Project Officers must:</b> <ul style="list-style-type: none"><li>a) Allow and scope sufficient time and resources for asbestos management and abatement works to be financed and programmed</li><li>b) Obtain information from the Asbestos Management System (AMS) about the location, type and risk level of asbestos containing material (ACM) present in the project work area</li><li>c) Inform all staff and contractors involved in the project of the location and condition of any ACM that may be affected by the project</li><li>d) Advise all staff and contractors involved in the project of the actions to be taken if suspect ACM is discovered, or there is an Asbestos Emergency. In all cases the Asbestos Management Team or a member of the Estates Safety Services should be contacted immediately.</li><li>e) Be responsible for ensuring the work complies with the requirements of the Asbestos Management Plan and that the works comply with relevant statutory regulations</li><li>f) Ensuring that any contractors (including but not limited to principal contractors, project managers, subcontractors) undertaking work on university properties have received Asbestos Awareness Training in accordance with CAR</li><li>g) Undertake Asbestos Awareness and refresher training with respect to asbestos issues to comply with legislation and to ensure a high level of asbestos awareness</li></ul>		

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2.	<p><b>Asbestos Risk Assessments</b></p> <p>a) Initial Asbestos Risk Assessment: Consult the Asbestos Register ( NexGen) for details: <a href="https://web.lucion.co.uk/">https://web.lucion.co.uk/</a></p> <ul style="list-style-type: none"> <li><i>If there is an asbestos risk to the project, the UPO shall appoint the Asbestos Consultant as part of the project delivery team at the early stages of the project lifecycle.</i></li> <li><i>Asbestos Consultant will assist with the assessment of asbestos risk by reviewing the quality and extent of existing information.</i></li> <li><i>Asbestos Consultant will offer the necessary advice on what to do next and decide whether the existing asbestos information is suitable and sufficient to permit the proposed work to proceed for the intended project.</i></li> </ul> <p>b) Project Specific Asbestos Risk Assessment:</p> <ul style="list-style-type: none"> <li><i>If the existing information is not suitable or sufficient for the project to proceed, further survey is required</i></li> <li><i>Request an Asbestos Survey by completing the Asbestos Survey Request Form <a href="https://www.ucl.ac.uk/estates/safety-ucl/asbestos-management">https://www.ucl.ac.uk/estates/safety-ucl/asbestos-management</a> and email it to <a href="mailto:estates.asbestos@ucl.ac.uk">estates.asbestos@ucl.ac.uk</a></i></li> <li><i>Formally instruct the work via CEMAR <a href="https://secure.cemar.co.uk/">https://secure.cemar.co.uk/</a></i></li> <li><i>Consult the Asbestos Consultant and Asbestos Management Team to determine the level of asbestos remediation/management required and assist you with the steps in planning the asbestos removals</i></li> </ul>
3.	<p><b>Asbestos Removals/Remediation</b></p> <p>a) Discuss the arrangements for the removal or containment of ACMs with the Asbestos Management Team</p> <p>b) ACM removal works to be managed by the Asbestos Consultant in conjunction with the University Project Officer's/Project Team's.</p> <ul style="list-style-type: none"> <li><i>The Project Officer must allow for sufficient time at the early stages of the project and during the planning and removal stages to take account of</i></li> </ul> <p>c) If areas identified as inaccessible at the time of the former survey, request a revisit survey</p> <p>d) Agree on the scope of works including waste disposal arrangements</p> <p>e) Asbestos Consultant to engage UCL's LARC or <i>different by Principal Designer appointment</i></p> <p>f) Development of plan of works by the LARC</p> <p>g) Assessment of plan of works</p> <ul style="list-style-type: none"> <li><i>7 days for the plan of work to be developed by LARC, and approved by the Asbestos Consultant</i></li> <li><i>Statutory HSE notification period (at least 14 days), where required for licensable asbestos activities</i></li> </ul> <p>h) Vacation of the work area (departmental staff, furniture, and equipment).</p> <p>i) Isolation of building engineering services as required for safe working.</p> <p>j) Arrangements and services for the contractor: parking, area for de-contamination unit, skip space, supply of water and power, security arrangements etc.</p> <p>k) Liaise and provide information to departments affected by the works.</p> <ul style="list-style-type: none"> <li><i>The removal of ACMs is considered a high-risk operation that can only be carried out by a LARC</i></li> <li><i>For <b>Design and Build</b> projects, the abatement documents shall be written in the context of performance specifications/documents to form part of the Employers Requirements, with the UCL's LARC acting as Nominated Sub-Contractors.</i></li> <li><i>For <b>Traditionally Procured</b> projects (specification and drawings) the abatement documentation shall be issued as part of the main tender package with UCL's LARC as a Nominated Subcontract to the Principal Contractor.</i></li> </ul>

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	<i>Where the abatement works form a separate enabling package prior to the main contract, the tender documentation shall be issued directly to UCL's LARC, who shall adopt Principal Contractor duties.</i>
4.	<p><b>Additional Considerations for CDM Notifiable Projects</b></p> <ul style="list-style-type: none"> <li>a) Principal Contractor, who is responsible for the Construction Phase Plan shall include for developing control systems to mitigate the asbestos risk and any other risk to health and safety during the construction phase.</li> <li>b) Asbestos Consultant shall determine whether the proposed controls are satisfactory. <ul style="list-style-type: none"> <li>• <i>During the construction phase, the <b>Principal Contractor</b> shall be responsible for controlling all risks from asbestos and continue to liaise with the Asbestos Management Team/Project Teams and Asbestos Consultant.</i></li> <li>• <i>Communicate any project/scope changes during the construction phase (e.g., Contract variations, change in project boundaries etc.) which result in further disturbance of asbestos.</i></li> <li>• <i>Such changes will be reviewed by the Asbestos Consultant and advise of mitigating actions, implications to the project programme and cost.</i></li> </ul> </li> <li>c) If asbestos remediation/removal works are occurring during the Construction Phase, UCL's LARC shall be employed as Nominated Sub-Contractors to the Principal Contractor. <ul style="list-style-type: none"> <li>• <i>The Asbestos Consultant shall be retained to undertake and Project Manage/Supervise/Air Monitoring for the asbestos abatement work based on the framework rates.</i></li> <li>• <i>Project Officer shall raise a purchase order (using the project code)</i></li> </ul> </li> </ul>
5.	<p><b>Management of all asbestos remediation/removal works:</b></p> <ul style="list-style-type: none"> <li>a) The ACMs removal works must be managed by the Asbestos Consultant in conjunction with the University Project Officer's/Project Team's.</li> <li>b) Asbestos Consultant will provide all necessary services relating to asbestos remediation/removal work management, air testing, analytical functions, and updating of UCL's central records (NexGen) <ul style="list-style-type: none"> <li>• <i>For <b>licensed asbestos works</b> the 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.</i></li> <li>• <i>For <b>non-licensed asbestos works</b> the Asbestos Consultant shall be commissioned to monitor site set up and undertake reassurance air tests as required based on the framework rates</i></li> </ul> </li> <li>c) No access is permitted to the affected area until the Asbestos Consultant <ul style="list-style-type: none"> <li>• <i>Issues the certificate of reoccupation (for licensed asbestos works); OR</i></li> <li>• <i>Provides notification confirming the area is safe to access (for non-licensed asbestos works).</i></li> </ul> </li> </ul>
6.	<p><b>Handover/Completion Files:</b></p> <ul style="list-style-type: none"> <li>• <i>All project handover files must refer to UCL's space IDs and UCL's Asbestos Referencing as detailed on the Asbestos Management System.</i></li> <li>• <i>Typical Handover/Completion Files for Licensed Asbestos Works and Non-Licensed Asbestos Works are outlined in Table 1 below:</i></li> </ul> <p><b>Table 1:</b></p>

Handover/Completion File Requirements:	Licensed Asbestos works	Non-Licensed Asbestos Works:
ASB5 notification	<input checked="" type="checkbox"/>	<input type="checkbox"/>
NNLW1 notification	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Asbestos consultants daily audit sheet (including site set up)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Leak air test results	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Reassurance air testing report	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Certificate of reoccupation	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Area safe to access notification	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Waste Consignment notes	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Details of Asbestos Residual Risk	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
AMS update (see below for further information)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Updated Asbestos Master Drawings	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

- Files shall be issued to the Project Officer's/Project Teams and available for download via NexGen.

8.

**Updating the Asbestos Management System (AMS-NexGen)**

a) NexGen is managed and updated only by the Asbestos Consultant and must be updated following:

- Asbestos survey work
- Removal, repair, or encapsulation of the ACM
- Changes to condition/location/extent of ACMs (e.g., asbestos incidents)
- Identification of further ACMs
- Changes/remodelling of floor layouts (e.g., space IDs)

b) NexGen is updated as soon as possible but no longer than one calendar month.

- Updates include changes on the master asbestos drawings

9.

**Non-UCL Asbestos Organisation(s):**

Should a project wish to use another organisation not on the University's appointed, such as an asbestos surveyor, or asbestos removal contractor **approval must be ascertained from the Asbestos Management Team**. Approval may be given on a case-by-case basis provided:

a) There is a reasonable ground presented to justify the deviation from using organisations on the University's Framework.

b) **Project Officer is responsible** to ensure work will comply with all other requirements under the Asbestos Management Plan and these works will comply with relevant statutory regulations.

c) Are appropriate Emergency Procedures in place to include contacting the Asbestos Management Team or a member of the Estates Safety Services immediately

d) Undertakes reasonable enquiries to confirm the competency and training of contractors in areas of work, before entering contracts for asbestos surveying, removal, remediation, treatment, and cleaning of asbestos, and all other aspects of asbestos works.

e) A suitable plan is in place to update NexGen as soon as possible and no longer than one calendar month at appropriate milestones throughout the project. For example, but not limited to:

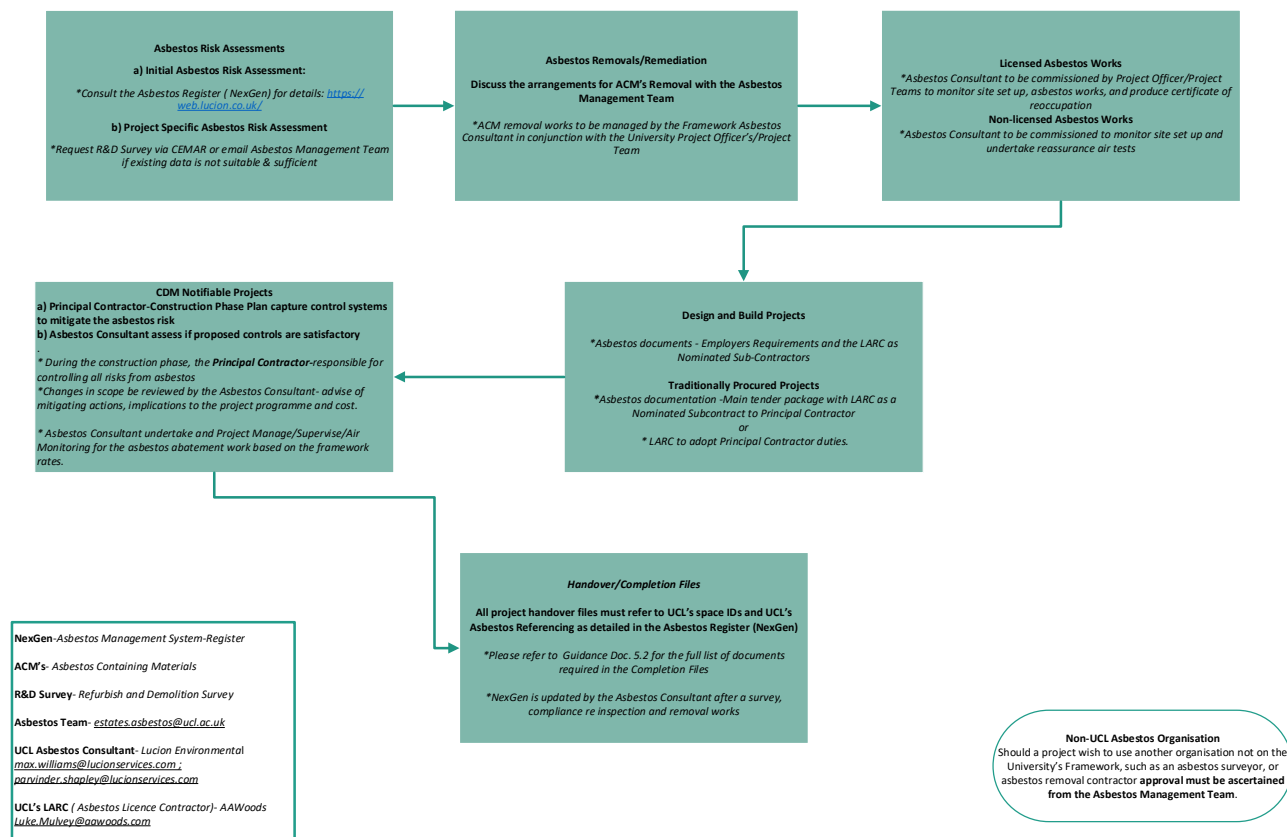
- On completion of asbestos survey works
- On completion of asbestos remedial/removal works
- On completion of floor layout changes/remodelling (Space ID)
- Prior to project handover

f) NexGen is managed only by the Asbestos Consultant and must be updated to reflect any ACM changes/remediation works. It will include an update of asbestos data and the update of Asbestos Master drawings (DWG's).

- Asbestos Consultant, Project Team and the non-UCL Asbestos Organisation(s) may require on-site validations.

g) Arrangements to be made for Handover/Completion files issued as specified above, to Asbestos Consultants and Asbestos Management Team for inclusion on NexGen.

## ASBESTOS MANAGEMENT PROCESS-5.2 MAJOR AND INTRUSIVE WORKS



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