
Estates Policy

Ventilation Ductwork Maintenance Policy

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UCL Estates Ventilation Ductwork Maintenance Policy

Version Control

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Note: it is policy to convert all procedural documentation in PDF format once complete and signed off. This document is to remain Microsoft Office Work format to allow for copying and pasting where required.

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1.0 Introduction

The University recognises its statutory obligations under the Health & Safety at Work Act 1974, The Management of Health & Safety at Work Regulations 1999, The workplace (Health, Safety and Welfare) Regulations 1992 and The Control of Substances Hazardous to Health (COSHH) Regulations 2002 to identify and control the risks to students, staff & visitors from fires and health and safety hazards caused by dust and debris in ventilation ductwork.

It aims to do this by having written procedures in place which comply with the proposals in BS EN 15780:2011 Ventilation for buildings - Ductwork - Cleanliness of ventilation systems. This standard clearly defines what is considered acceptably clean in ductwork.

With standardised levels of cleanliness in ductwork systems stated according to the building use, specifiers, installers and facilities managers have clear guidance, a published set of standards to work to and a new vacuum test that can apply to circular duct as well as rectangular ductwork.

The Workplace (Health, Safety and Welfare) Regulations 1992 require mechanical ventilation systems to be maintained including cleaning as appropriate in an efficient working order and in good repair. The ACOP guidance to Regulation 6 states:

“Mechanical ventilation systems (including air-conditioning systems) should be regularly and adequately cleaned. They should also be properly tested and maintained to ensure that they are kept clean and free from anything which may contaminate the air.”

2.0 Purpose

The purpose of this document is to detail the UCL management arrangements to be followed to ensure compliance with its legal duty to control the risk associated with the cleanliness of ventilation systems and covers the following:

- Roles and responsibilities
- Records
- Training
- Monitoring & review

3.0 Scope

This document details how UCL will address the issue of the cleanliness of ventilation systems. The University has a duty of care to all Students, Staff and Visitors across its entire Estate and as such, this Policy shall be applicable to all UCL UK buildings, as listed on the UCL Building Register.

The only exception to this is with regards to leasehold buildings, where UCL does not hold the maintenance or repair obligations. In such areas, UCL Responsible Person –

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4.1 Roles & Responsibilities

The principal responsibilities for the management of health and safety are stated in the UCL Safety Policy. Specific responsibilities relating to the management of ductwork cleanliness are stated below.

4.1.1 UCL Council – Duty Holder

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

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.

4.1.2 The President and Provost

The President and Provost is the duty holder responsible to UCL Council for the day-to-day duty holder responsibilities of UCL in all of its activities, including the management of ductwork cleanliness.

The role takes overall responsibility to ensure that the standard for ductwork cleanliness is implemented and that appropriate funding is made available to carry out works and management activities.

The Council has constituted the Health & Safety Committee (HSC) to determine a policy framework for health and safety and the executive arrangements therein, which includes the management of ductwork cleanliness.

4.1.3 Senior Management Team

The SMT are responsible to the Council for the planning, consultation and dissemination of the arrangements made within this ductwork cleanliness policy and shall maintain details of appointees with responsibilities for ductwork cleanliness within RiskNET and the reporting of relevant information to UCL Estates.

4.1.4 UCL Safety Services

UCL Safety Services are responsible for the provision of independent competent safety advice and for reviewing departmental organisation and arrangements.

4.1.5 UCL Director of Estates

The UCL Director of Estates has responsibility for the strategy and budget allocation for the ductwork cleanliness risks at UCL.

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The Director of UCL Estates through the Director, Facilities & Infrastructure and Faculty Directors, is responsible for day-to-day management control of ductwork cleanliness risks with the technical support from Safety Services.

4.1.6 Director, Facilities & Infrastructure

The Director, Facilities & Infrastructure is responsible for the allocation of finances and resources for the assets under the F&I control which are subject to the potential ductwork cleanliness health and safety risks.

The Director allocates resources to ensure training and competency is sufficient for the responsible persons to undertake their duty.

4.1.7 Head of Engineering - Responsible Person - Ductwork Cleanliness Governance

In all instances the term 'Responsible Person', and the associated duties, applies equally to any nominated Deputy formally appointed to act on all occasions when the nominated Responsible Person is unavailable.

The Head of Engineering has managerial responsibility for the ductwork cleanliness risk compliance and providing supervision for implementation of the precautions through:

- Manage the UCL Estates Policy and SOP for the management of UCL's ductwork cleanliness risks, and takes managerial responsibility.
- Appoints, in writing, 'Responsible Persons' to be responsible for the day-to-day management of UCL's ductwork cleanliness and compliance with current regulations, the UCL Estates Policy and SOP.
- Ensures that the Responsible Persons are aware of their roles and responsibilities and that they are competent to carry them out.

The full details, expectations and requirements of this role are contained within the UCL Ventilation Ductwork Maintenance Standard Operating Procedure, which is controlled by UCL Engineering, Maintenance and Infrastructure. The Standard Operating Procedure forms part of this policy.

4.1.8 Responsible Person - Ductwork Cleanliness - Operation

In all instances the term 'Responsible Person', and the associated duties, applies equally to any nominated Deputy formally appointed to act on all occasions when the nominated Responsible Person is unavailable.

The Responsible Person – Ductwork Cleanliness – Operation is a duty holder and has been delegated the primary role to act as administrator in the

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management of ductwork cleanliness in accordance with the UCL Estates Policy and has managerial responsibility for supervising the implementation of this policy, the standard operating procedure, and the management of the ductwork ventilation systems under the control of UCL Estates.

In leasehold building or areas where UCL does not hold the maintenance or repair obligations, the UCL Responsible Person – Ductwork Cleanliness – operation shall ensure that the landlord is carrying out such tasks to the same level of conformity and diligence as defined in The Workplace (Health, Safety and Welfare) Regulations 1992 and in this policy and standard operating procedure.

The full details, expectations and requirements of this role are contained within the UCL Ventilation Ductwork Maintenance Standard Operating Procedure, which is controlled by UCL Engineering, Maintenance and Infrastructure. The Standard Operating Procedure forms part of this policy.

4.1.9 Responsible Person - Ductwork Cleanliness - Review & Change

In all instances the term ‘Responsible Person’, and the associated duties, applies equally to any nominated Deputy formally appointed to act on all occasions when the nominated Responsible Person is unavailable.

The Responsible Person - Ductwork Cleanliness - Review is a duty holder and has been delegated the managerial responsibility for reviewing the compliance and performance against this policy.

The Responsible Person - Ductwork Cleanliness – Review & Change produces and develops the policy and standard operating procedures for Ductwork Cleanliness management on behalf of the Head of Engineering, and periodically audits their implementation.

The Responsible Person – Ductwork Cleanliness – Review & Change has also been delegated the managerial responsibility for supervising the implementation of this standard and the management policy of any changes, additions to, or replacements of existing systems, or any new installations to the ventilation ductwork systems under the control of UCL Estates.

The full details, expectations and requirements of this role are contained within the UCL Ventilation Ductwork Maintenance Standard Operating Procedure, which is controlled by UCL Engineering, Maintenance and Infrastructure. The Standard Operating Procedure forms part of this policy.

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4.1.10 UCL Estates (Project Managers, University Project Officers and University Service Managers)

Project Managers, University Project Officers and the consultants they appoint are responsible for ensuring systems are designed and installed in compliance with the documents contained in the Reference section to this and document, and the UCL Estates Policy and Standard Operating Procedure.

The Responsible Person – Ductwork Cleanliness – Review & Change is to approve each stage of the design and acceptance.

The Project Manager and University Project Officers will be responsible for ensuring that ductwork cleanliness is maintained throughout any project, and is to include controls such as filter changing, sealing of open ductwork ends during construction to prevent vermin or material ingress and a full clean out of the ductwork before the commencement of commissioning.

The Project Manager and University Project Officers will be responsible for ensuring that plant and services are capable of meeting any increased demand where a system is extended and for the provision of as fitted drawings at the time of handover together with all commissioning data.

No system will be accepted unless the Responsible Person – Ductwork Cleanliness – Review & Change has given the final written approval.

4.1.11 Contractors (and managers employing contractors)

Those who employ contractors to work on ventilation systems shall be responsible for ensuring the work complies with the requirements of this policy and the standard operating procedure, and that the works comply with the relevant requirements of The Workplace (Health, Safety and Welfare) Regulations 1992.

Reasonable enquiries are to be made to confirm the competency and training of contractors in the area of work, before entering into contracts for the cleaning of the ventilation system.

Contractors are to be made fully aware of the duties and responsibilities assigned to them, and are to be familiar with the UCL Standards.

Only UCL Approved Contractors are permitted to work on UCL installations and systems.

Contractors are to have completed the necessary UCL Safety Questionnaires and that their responses have been assessed.

<http://www.ucl.ac.uk/estates/procedures/new-project-management/forms/>

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Contractors are to comply with the UCL Safety Policy 'Safety Rules for Contractors employed on UCL Premises', and sign the document accordingly.

4.1.12 Heads of Departments (other than UCL Estates), Responsible Person – Ductwork Cleanliness Governance

Heads of Departments are responsible for identifying, assessing and controlling the health and safety risks from any ventilation ductwork systems Installed within their department and/or departmental ventilation equipment that could present health and safety risk.

In addition, subject to agreement by the Responsible Person (Operation), UCL Estates may also be responsible for certain identified items of department equipment, upon acknowledged receipt of a UCL Estates Data Collection Sheet (Asset Register request).

Where departmental equipment is not managed by Estates, a local inventory of ventilation ductwork or equipment that could present a health and safety risk should be maintained by the Appointed Person (Statutory Testing) to ensure that all equipment is assessed and subject to appropriate controls.

Departments can seek advice/input on their assessments and controls from Safety Services and/or Estates or Estates Competent Persons.

Departments are responsible for reporting to the Facilities Customer Services Help Desk when any permanent or temporary installations (i.e. Experimental Rigs) are installed that incorporate ventilation ductwork stating that the issue is a health and safety risk.

The UCL Estates Responsible Person (Operation) will be responsible for arranging the removal of ventilation ductwork within all areas that are no longer required. UCL Estates will be responsible for amending the schematic drawings as appropriate, and deciding if the changes warrant the ventilation ductwork risk assessment to be reviewed.

4.1.13 Appointed Person – Statutory Testing

The Appointed Person (Statutory Testing) will maintain a list of specific items of ventilation ductwork or equipment or types of equipment that could present a health and safety risk and this list should identify who is responsible for management of the equipment (department vs Estates). Where equipment is under sole management of the department, they should confirm that an appropriate assessment has been carried out and measures are in place to control identified risks.

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4.2 Records

Records must be kept to confirm compliance with regulations and this standard, and retained for the periods stated.

- A ventilation ductwork hygiene risk assessment must be completed for the Workplace (Health, Safety and Welfare) Regulations 1992. The report will categorise the level of risk of the building and the appropriate cleaning regime and management control necessary for the risks in that building.
- Any significant findings and action points of the risk assessment must be prioritised and actioned accordingly.
- Deviations or health and safety risks which are likely to lead to non-compliance are to be reported directly to a Responsible Person for management action. The Competent persons are to take all immediate action to reduce/mitigate non-compliance. These records must be retained throughout the period for which they remain current and for at least two years after that period.
- The results of any cleaning, monitoring, inspection, test or check carried out, by whom, and the dates must be recorded. This should include details of the state of operation of the system i.e. in use/not in use. These must be retained for at least five years.

4.3 Training and competence (See also UCL Authorisation of Technical Competence)

Ventilation cleanliness training will be provided at 3 levels to suit the different roles of staff:

- Management– for on-site supervision
- Technical / maintenance– for maintenance, operational works and record keeping
- Operatives/equipment users – operational training and refresher training as required

The training for maintenance staff shall ensure that they obtain the prescribed training, experience and competence required in the legislation and are made aware of the operational and record keeping requirements of the regulations. Records of training and competence shall be maintained on a UCL records system file.

Training records/evidence of competence must be provided by contractors and confirmation that they have the prescribed training, experience and competence required by the legislation for the work they are required to carry out. Records of training and competence shall be maintained on a UCL records system file.

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4.4 Monitoring & Review

The Estates Standard Operating Procedure(s) and Risk Assessments detail the procedures for preventing, monitoring and controlling risk. These documents along with this standard shall be annually reviewed to ensure they remain up to date.

5.0 References

- The Workplace Health & Safety at Work etc. Act (1974).
- Management of Health and Safety at Work Regulations 1999
- (Health, Safety and Welfare) Regulations 1992
- Control of Substances Hazardous to Health Regulations 2002 (COSHH)
- HSE General Ventilation in the Workplace – HSG 202 – 2000
- BS EN 15780:2011 Ventilation for buildings - Ductwork - Cleanliness of ventilation systems.
- CIBSE TM26 - Hygienic maintenance of office ventilation ductwork – 2000
- UCL Design Brief for Mechanical, Electrical & Vertical Transport Services
- HSE Essential information for providers of residential accommodation INDG376 05/03

Safety Services References

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