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Health and Safety Office

Asbestos Management Arrangements

SAF-MAN-AMP

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Asbestos Management Arrangement

This document outlines the University Arrangements to manage asbestos in accordance with the University's Asbestos Policy (SAF-POL-ASB).

1. Introduction

This arrangement applies to all UK premises under the control of the University of Nottingham.

The objective of the management arrangement is to protect staff, students and contractors who may come across asbestos in the course of their day-to-day activities and others who may be at risk from the potential release of asbestos fibres into the atmosphere.

The presence of an asbestos-containing material (ACMs) in itself does not constitute a danger. There is a potential risk to health if ACMs are disturbed and fibres are released and become airborne.

Asbestos fibres can be found in the atmosphere in the UK, 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.

2. Asbestos Analytical Consultant

The University Asbestos Manager (UAM) will formally appoint an UKAS accredited asbestos analytical consultant for the University. The asbestos analytical consultant will be evaluated for performance annually by the UAM against the roles and responsibilities identified in the UoN Asbestos policy and that evaluation will form part of the annual report to the UoN Safety Committee.

The appointment will be agreed in writing and the appointment details held by the UAM.

3. Asbestos Surveys

In order to be able to manage asbestos, the University need to know where it is, what it is and what risk it presents. An asbestos survey is carried out for this purpose and from this, an Asbestos Register compiled.

The HSE document HSG264 'Asbestos: The survey guide' is the recognised standard for asbestos surveys:

- **Management Survey**

A management survey is the standard survey. Its purpose is to locate, as far as reasonably practicable, the presence and extent of any suspected ACMs in University buildings which could be damaged or disturbed during normal occupancy, including foreseeable maintenance and installation, and to assess their condition. This type of survey will be used to populate the University's asbestos register.

- **Refurbishment and Demolition Survey**

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.

- **Air monitoring survey**

Air monitoring is deployed in order to establish airborne contamination levels. Such monitoring will be used to assure the University that levels are within University limits.

All types of survey will be carried out by the appointed asbestos analytical consultant and arranged by the UAM or deputy. All surveys can be requested by completing the appropriate AS1 form, which is sent to the UAM or deputy.

The results of the survey will be added to the asbestos register, in line with the policy.

4. Asbestos Management Risk Assessment

As part of any asbestos survey a Risk Assessment score for each ACM will be produced that combines the algorithmically generated Material Assessment Score (this takes into account what the product type is, any damage, surface treatment and asbestos type) and the algorithmically generated priority assessment (this takes into account of its location, extent, use of area, occupancy levels, likelihood of disturbance). This is based on the HSE guide HSG264.

This asbestos management risk assessment is carried out by the asbestos analytical consultant, as part of routine survey work and recorded in the asbestos register, in accordance with policy. The UAM has oversight to ensure this is completed.

The UAM will complete a review of the risk assessment data and control recommendations in order to establish a prioritisation action plan of this data on an ongoing basis, as to ensure appropriate management of asbestos. This information will be used to inform the asbestos management plan for all materials. The UAM is responsible for ensuring this critical review is undertaken.

ACM Risk Levels

ACM will be classified as either high, medium or low risk depending on the score. High risk material will have a score of 10 or more, medium risk materials score between 7 and 9 and low risk will have a score 6 or lower. This classification will determine the required actions as detailed below.

All materials will be subject to routine re-inspection and risk evaluation.

High Risk Materials

If the survey identifies high risk material then access to the area or materials must immediately be restricted. The UAM must be informed immediately and priority action taken to remove or encapsulate the materials. Unauthorised access to such materials is considered a safety critical incident.

Where high risk materials are identified assurance air monitoring must also take place.

Where, prior or during completion of any survey, should there be any serious concerns that materials may be high risk, then the UAM must be informed immediately and appropriate action taken, at the direction of the UAM.

Medium Risk Material

After all high risk materials have been dealt with, medium risk materials will be managed in line with their risks and any recommendations received from the asbestos analytical consultant. The UAM will then make a decision on the most appropriate action.

If in an area which is subject to routine entry, then this area must be added to the Access to an asbestos contaminated area risk assessment and associated SOP by the UAM.

Low Risk Material

Materials that are consider low risk will be subject to routine re-inspection and risk evaluation.

5. Asbestos Register

Information regarding the location and condition of ACMs within the University is held on the Asbestos Register.

The register will hold the following information;

- All ACM information, including historic information
- Plan of all building
- Areas where surveys have been carried out
- Where surveys have not been carried out
- Detailed survey information and report
- Where ACM has been identified and risk assessment of the asbestos in that area
- Schedule of air monitoring and re-inspection
- All records relating to any removal/remediation projects

Additional information should ideally be made available through the register;

- Permits to Work
- Removal Specifications, Plans of Works, ASB 5 Notifications, Method Statements, Risk Assessments, Consignment Notes, Air Testing Certificates, Certificate of Reoccupation

Access will be made available to relevant or interested parties by the UAM or deputy. Access must be granted prior to the commencement of any work and at least 5 working days after request.

Where no information regarding ACMs is available, it must be presumed that ACMs are present unless the age of the building is such that no ACMs will have been used in its construction. This information must be contained within the current asbestos register.

Within the University there are three routes of action based on known or unknown information. These are:

Known to be asbestos free (new buildings or where removal and clearance has taken place)	Proceed as per RAMS
Known to contain asbestos	Seek guidance from UAM
Unknown but assumed asbestos	Survey must be completed prior to entry

6. Asbestos Management at UoN

If Asbestos is Present

Where asbestos is known to be present or has been discovered by an asbestos survey, the University will manage the asbestos within its premises through the following approaches:

Manage the risk presented by the asbestos-containing materials (ACMs):

- Encapsulate the ACMs (Where necessary)
- Record the ACMs in an Asbestos Register which details; the location, the type of asbestos, the application, action required, date removed or repaired and the inspection date.
- Conduct regular inspections (as identified by risk assessment in the asbestos register) to review the ACMs condition to ensure that it remains undisturbed
- Ensure information is made available to all who work within the building with reference to ACMs (Asbestos Policy, Asbestos Register and Marked Drawings), including all the control measures that are in place (Management Plan, Permit to Work System and Access/Emergency Procedures) on request
- To remove the asbestos-containing materials the UAM along with the Director of Estates or nominated deputy will make the decision whether to have the materials removed or to manage the ACMs. The HSE and University position on asbestos is that it should not be disturbed unless there are other factors that warrant the works.

Asbestos Removal

Only a University approved HSE licensed contractor must do work on asbestos and asbestos removal of asbestos insulation, coating and boarding. The appointment and approval for asbestos removal companies is managed by the UAM. The disposal of asbestos is controlled by the Special Waste Regulations 1996. An HSE licenced contractor must be used to remove all types of asbestos waste, in accordance with the University Hazardous Waste Policy.

The UAM and Estates Office must establish a recognised process for asbestos removal.

Where removal work takes place, a four stage clearance process is undertaken by the asbestos analytical consultant, who must be independent of the licenced removal contractor. This process must be overseen by the UAM.

Works Requests / work planning

Every job request should be assessed for the possible presence of asbestos, by consulting the asbestos register. It is the responsibility of the manager to ensure that appropriate checks of the register are completed prior to any work starting. The operative is required to confirm they have checked the register and noted that it is safe to proceed.

Where in doubt, advice must be sought from the UAM prior to work commencing.

Works on services which may disturb ACMs (Work Planning)

When any works on services which may disturb ACMs, or work which would involve disturbing the fabric of the building a relevant risk assessment must be made of all works, and if there is any doubt advice should be sought from the UAM.

There is always the possibility of asbestos which has not been located during an asbestos survey being discovered during maintenance, minor or major works. Should any suspicious materials encountered then these should be immediately reported to the UAM and the emergency protocols followed before works can proceed.

7. Selection of Contractors

Contractors must be selected and appointed under the UoN Management of Contractors Arrangement

8. Monitoring and Review

The below maps to University Arrangements for monitoring and details the various assurance levels and activities required.

Key Types of Active Monitoring required					
Level	Type	Brief Description	Environments it applies to	Who leads / carries out	Reported to
1	Asbestos spot check (observation)	Asbestos spot check against template	Estates or contractor controlled work areas.	Estates Project staff and Line managers	UAM
2	Inspections	More in-depth check of working environment and contractor management including the presence of safety documents. A number to be carried out 6 monthly on a rolling programme. All areas to be covered every 3 years.	Estates or contractor controlled work areas.	UAM	Director of Estates and Facilities
3	BU Mini-audits with Success Indicators	A detailed consideration of compliance in relation to asbestos management against the UoN success indicator for asbestos	Estates or contractor controlled work areas.	UAM	Director of Estates and Facilities and Health and Safety Office
4	Asbestos management plan	A desk-top self-review of the asbestos management system that is recorded on a set University template. Annually required.	All Asbestos works	UAM (in consultation with The Health and Safety Office)	Health and Safety Office

Level	Type	Brief Description	Environments it applies to	Who leads / carries out	Reported to
5	University Audits	Thorough in-depth audit of asbestos activities at UoN, to be completed 3-5 years.	Estates activities	Health and Safety Office coordinates and carries out.	Health and Safety Office

The results of the above monitoring will be used to inform the annual asbestos report to the UoN Health and Safety Committee. Any additional information will be taken to the UoN Health and Safety Committee as directed by the Director of Health and Safety.

Suggested KPIs for asbestos management plan

Table for Assurance Reporting			
Description of Report	By	To	Frequency
Asbestos Assurance Report to include: <ul style="list-style-type: none"> ▪ Re-inspections - % completed on time ▪ Re-inspections - % completed ▪ Number of asbestos removal jobs completed, detail any lessons learnt ▪ Summary of Asbestos Bulletins issued ▪ Number of requests for information ▪ Number of completed requests in SLA ▪ % of trained EMS ▪ % of third party training checked ▪ Who is accessing the register, cross reference % of jobs to confirm register consulted ▪ Waste report / consignments notes ▪ % of Management surveys completed for each campus ▪ No of R & D surveys carried out ▪ Check on-site contractors for training and surveys present 	UAM	Responsible Person / Safety Committee	Quarterly
Incident Reports: <ul style="list-style-type: none"> ▪ Investigation into exposures ▪ Investigation into non-compliances with Asbestos Management Plan/Arrangements 	UAM / Safety Office	Responsible Person / Safety Committee	As required
Audit on Asbestos Management System (ACA – Asbestos Compliance Assessment)	Safety Office	Safety Committee/ UAM	3 – 5 Years

9. Procedure for Labelling Asbestos

All ACMs will not be labelled as a matter of course but all known ACMs will be detailed on the asbestos register. The labelling of ACMs is to be regarded as the 'last line of defence', and the absence of a label should never be taken as an indication that a material does not contain asbestos.

Labels may be used where it is thought they will be of benefit, typically for materials that are concealed from immediate view.

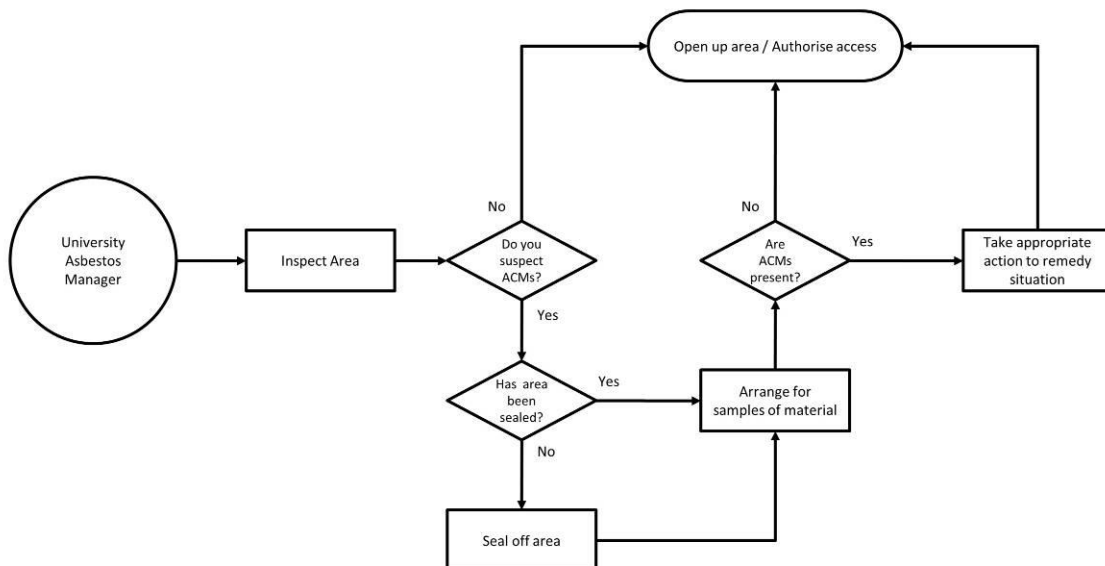
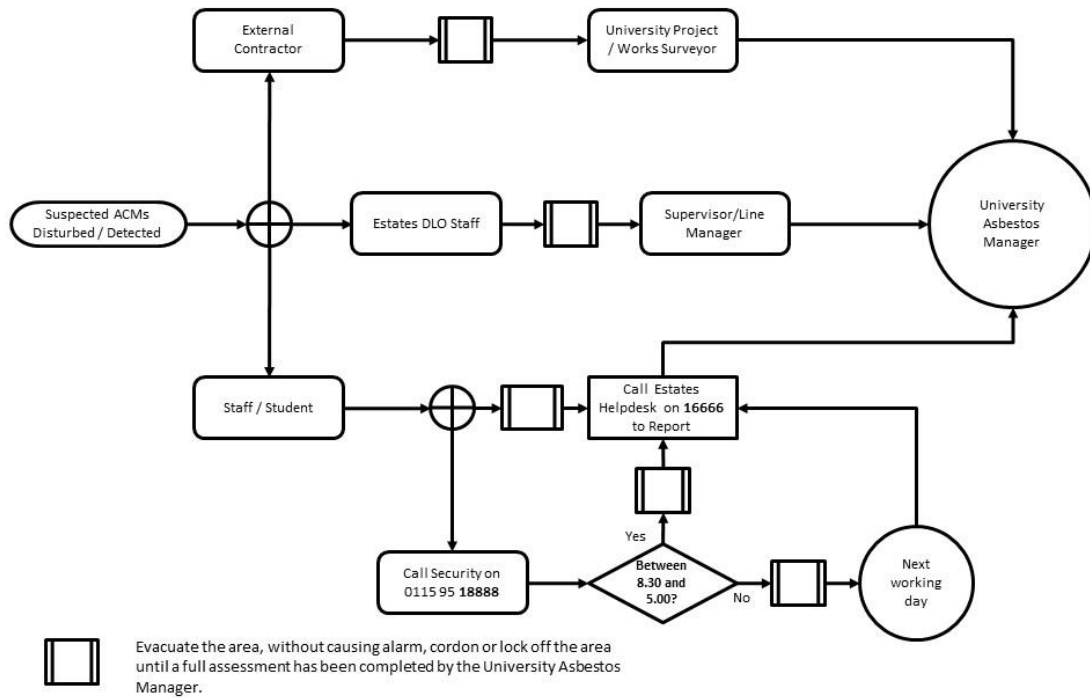
Appendix A

Asbestos Management Forms

Table of Asbestos Management Forms		
Reference	Title	To be completed by
EST-ACA	Asbestos Compliance Assessment	University Asbestos Manager/Deputy
EST-AS1	Request for Asbestos Sampling	Person requesting sampling/person in charge of works. University contact only.
EST-AS2	Pre-Start Checklist	University Asbestos Manager/Deputy
EST-AS3	Smoke Test Certificate	University Asbestos Manager/Deputy
EST-AS4	Work Completion Checklist	University Asbestos Manager/Deputy
EST-AS5	Summary of Major Asbestos Installations – For Emergency Services	University Asbestos Manager/Deputy
EST-AS6	Asbestos Safety Alert	University Asbestos Manager/Deputy
EST-AS7	Potential Exposure to Asbestos Record	University Asbestos Manager/Deputy
	PPE Issue Record	Line Manger/Supervisor
	RPE Inspection Record	Competent Person
	Permit to Work Asbestos	University Asbestos Manager/Deputy
ASB1	Asbestos – Hazards and Risks	Information regarding asbestos hazards
ASB2	Managing Asbestos in Schools	Information for managing asbestos within the school

Appendix B

Emergency Procedures for the discovery of suspected asbestos materials



Appendix C

Asbestos Information Request Flowchart

All works **MUST** follow this process.

