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Health and Safety Office

Policy

Asbestos Management

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Asbestos Management Policy

University policies establish standards and expectations for health and safety across the organisation and set the minimum standards expected.

Each working unit, which may be a Department, Site, Institute or School and will be referred to as a Business Unit in this policy, can produce its own arrangements, in order to locally implement these standards. Any standard(s) imposed at a local level must meet all requirements set out in this policy. Where there is a discrepancy, the University policy takes precedence.

1. Regulatory background

The Control of Asbestos Regulations 2012 are intended to protect against risks arising from exposure to asbestos.

The Control of Asbestos Regulations 2012 came into force in the UK on 6th April 2012. These Regulations introduce a single lower Control Limit for airborne asbestos, a fibre counting method and the de-classification of textured coatings. The main thrust of the Regulations, however remains the duty to manage asbestos within premises. The requirement to manage asbestos in non-domestic premises, applies when any work with asbestos or with any product containing it is carried out by the employer.

Exposure of employees to asbestos should be prevented, or reduced as far as reasonably practicable. The new Regulations set down a control limit at, or above, which employees must not be exposed unless they are wearing protective equipment, and oblige employers to assess any risk prior to any work with asbestos so that appropriate measures can be taken to control exposure. There is also a duty to prevent or reduce, as far as is reasonably practicable, the spread of asbestos from the workplace where the work is carried out. There are also requirements on personal protective equipment and on ensuring that asbestos is stored or transferred only in suitable sealed and marked containers. The duties to protect employees are extended to anyone else who may be affected by the work, including members of the public. Protective equipment requirements are described in the Personal Protective Equipment at Work Regulations 1992.

The Construction (Design and Management) Regulation 2015 require a client to provide the Principal Contractor and Principal Designer with all relevant pre-construction information about a project, this should include surveys of the building for asbestos.

2. Asbestos Policy Statement

The University does not expect our employees to work with Asbestos (Notifiable and Licenced activities), all such work will be carried out by an external competent contractor, under the oversight of the University Asbestos Manager.

Employees will not be expected to work in areas where asbestos levels are above the control limit (0.1 fibres/ml). Asbestos contaminated areas where employees carry out routine tasks, including maintenance will be monitored to ensure asbestos air sampling levels are below 0.01 fibres/ml. Access to all known asbestos materials is via permitted systems by authorised personnel. The asbestos register must be consulted prior to work.

The University recognises that it holds a number of known contaminated areas where routine or emergency access is needed. In such circumstances, access is via Estates office only and must follow the recognised University procedure. This includes work done by external contractors, on behalf of the University.

The University will employ techniques to appropriately manage asbestos. Using key information on risk to inform our decision. The University recognises there are a number of techniques available, including removal, encapsulation and management in-situ and will ensure the most appropriate action is taken based on risk.

No intrusive work tasks can be started in buildings constructed prior to 2000, without the Asbestos Register first being checked and an appropriate survey in place.

3. Roles and Responsibilities

University Council will

- Receive annual assurance reports from the Health and Safety Office in association with the Director of Estates and Facilities on Asbestos Management safety.

The University Safety Committee will

- Be the formal oversight and compliance committee for the University and will provide assurance to University Council
- Promote good practice among University staff and students in relation to the management of asbestos
- Consider and advise on University asbestos management policy and arrangements
- Be notified of any significant accident, incident or enforcement action
- Receive annual report of audits and assurance monitoring

University Executive Board (UEB) will

- Ensure that they are provided with information on the significant risks from asbestos related hazards facing the institution
- Consider the risk implications of strategic decisions such as large projects
- Seek assurances that emergency plans are in place in case of exposure to asbestos
- Seek assurances that all mandatory requirements for asbestos management are met
- Seek assurances that all health and safety arrangements for asbestos management are adequately resourced
- Seek assurance that risk control measures to ensure safety from asbestos are in place and are being acted upon
- Seek assurances that those with asbestos management responsibilities are adequately trained and competent
- Seek assurance that there is a process for auditing health and safety performance for the management of asbestos
- Seek assurance that competent health and safety advice is available to assist in managing and assessing risks from asbestos
- Be notified of any significant accident, incident or enforcement action

The Health and Safety Office will

- Provide and keep updated, policies, arrangements and guidance to ensure any statutory requirements for asbestos management are met
- Provide competent advice and support on asbestos management to the University
- Ensure appropriate oversight for compliance with Control of Asbestos Regulations and provide reports to University Safety Committee and UEB
- Have an oversight on asbestos related safety training and ensure adequacy through routine review
- Have an oversight of reported incidents concerning asbestos and make recommendations where necessary
- Have oversight in situations where Asbestos-Containing Materials (ACMs) have been disturbed and carry out an investigation with the assistance of the University Asbestos Manager (UAM) and report findings to the University Health and Safety Committee and UEB
- Lead on and coordinate visits by external agencies, including the Health and Safety Executive
- Receive annual assurance reports from the Director of Estates and Facilities on Asbestos Management safety
- Monitor Business Units and contractors are adhering to the University Policy by carrying out audits (see University Health and Safety Monitoring Policy)
- Where a known exposure has occurred, ensure there is a suitable process in place to maintain personal health records / exposure records for forty years minimum

Director of Estates and Facilities will

- Ensure that management of asbestos meets the requirements as set out in University policy and associated arrangements
- Ensure that an Asbestos Management Plan is implemented which meets the requirements of University policy
- Ensure that a University Asbestos Manager (Appointed Person) (UAM) and deputy are appointed formally. As per the requirements as set out in the University arrangements Safety Critical Roles
- Ensure that the UAM has sufficient training, experience, knowledge, time and resources to enable them to meet all of the statutory provisions
- Ensure that adequate resources are allocated to the management of asbestos
- Ensure that an internal health and safety inspection programme is in place in accordance with this policy and ensure reports are considered by the Estates health and safety committee
- Consider any asbestos risk implications of strategic decisions such as new projects and relevant construction work
- Lead on any campaigns associated with asbestos risk management
- Lead by example e.g. undertake leadership walk rounds
- Ensure that following any significant accident, incident or enforcement action that an appropriately investigated is undertaken and any findings implemented
- Ensure that asbestos management is included as relevant in a memorandum of understanding for shared facilities

The University Asbestos Manager (Appointed Person) will

- Implement systems to ensure the management of asbestos meets the requirements as set out in University policy and associated arrangements
- Implement and produce the Asbestos Management Plan to ensure that appropriate measures of controlling the risks from ACMs are undertaken
- Ensure that any asbestos removal work is notified to the Health and Safety Executive by the Asbestos Removal Contractor and that adequate records are maintained
- Ensure that no work requiring notification starts prior to approval
- Ensure that an appropriate plan of works is in place and approved prior to commencing work
- Ensure access is arranged for the Asbestos Analytical Consultant to allow a suitable inspection, re-inspection and to undertake surveys
- Ensure that the asbestos register is up-to-date
- Ensure that the asbestos register is updated after removal works
- Ensure surveys and/or sampling are suitable and sufficient for the works being undertaken and meet the standards required for compiling information for the register
- In conjunction with the Health and Safety Office, assist investigating any uncontrolled exposure to airborne asbestos fibres because of work upon or damage to University premises

- Ensure that regular re-inspections of known ACMs are carried out as identified by the online asbestos register schedule and updated as required.
- Ensure that suitable competent asbestos removal contractors are used for any asbestos removal works
- Ensure that any Asbestos Analytical Consultant and Asbestos Removal Contractors duties as detailed below are contained in within a contract between the University and these parties
- Ensure removal paperwork received from the asbestos removal contractor is present and in good order
- Liaise with the asbestos removal contractors over site works, including pre-start meetings, site visits and reviews on completion of works
- Ensure that any University staff who commission works (either by external contractors or internal maintenance staff) likely to disturb asbestos have the appropriate Construction Phase Plan or Risk Assessments and Method Statements prior to the commencement of the works in relation to asbestos management.
- In collaboration with the Health and Safety Office, provide information, support and advice to Business Units on all matters concerning the management of ACMs
- Ensure that appropriate information is communicated to University staff, students and contractors
- Manage performance of Asbestos Removal Contractors and Asbestos Analytical Companies providing feedback at contract meetings and to the Director of Estates and Facilities
- Ensure that training records are kept in accordance with University policy
- Ensure monitoring of asbestos activities as per University policy and arrangements

Deputy Appointed Person will

- Assist the University Asbestos Manager and undertake a holding role in their absence

Heads of Business Unit will

- Ensure the dissemination of the University's arrangements for the management of asbestos to relevant people within the Business Unit
- Ensure that the University Asbestos Manager is informed of all equipment within their area of responsibility that may contain asbestos for the purposes of maintaining the central register as defined in SAF-GUI-ASB2
- Ensure that the of condition of asbestos-containing components within equipment is monitored and ensure appropriate action is taken where damaged or deteriorating components are identified
- Ensure records of condition checks carried out and that records of any remedial work are kept
- Ensure appropriate staff are identified and ensure delivery of appropriate training, including those inspecting asbestos containing equipment
- Ensure no work that will take place on the fabric of the building without the authorisation of the UAM

Occupational Health will

- Undertaking health surveillance services where appropriate in accordance with the Control of Asbestos Regulations where identified through risk assessment
- Ensure maintenance of health records / exposure records

Line Managers will

- Comply with all policy's, arrangements and guidance both at a University and local level
- Take appropriate action in the event of an emergency as per University emergency procedure
- Inform the Head of Business Unit of all equipment within their area of responsibility that may contain asbestos
- Ensure that staff they're responsible for, receive relevant asbestos training and that this is recorded on personnel records
- Report any shortcoming or defect in the current control measures.
- Ensure that any damaged materials that are suspected to contain asbestos are reported to UAM immediately (via Estates Helpdesk)

All Staff / Students will

- Take appropriate action in the event of an emergency as per University emergency procedure
- Ensure that any damaged materials that are suspected to contain asbestos are reported to UAM immediately (via the Estates Helpdesk)

Estates / Project Staff (Responsible for appointing or managing works) will

- Facilitate the repair or removal of asbestos, if there is a risk of exposure due to programmed works, as directed by the UAM
- Register any work with the UAM and collate and supply necessary documentation and certification as required by the 'asbestos work record sheet'
- Ensure that, prior to the commencement of any works that may have the potential to bring anyone into contact with ACMs, the asbestos register is consulted and informs the risk assessment for the works
- Distribute / communicate existing registers to CDM Principal Designer and other relevant personnel
- Ensure information is available to those who may come into contact with or disturb ACMs in the execution of programmed works. Information shall be provided in a written format and shall be correct on the date it is presented. Attain receipt or written confirmation of information transfer
- Ensure no work is undertaken until correct surveys are commissioned, complete and available
- Attend any mandatory training when requested

Direct Labour / Contractor / Sub-Contractor will

(where there is known asbestos work, the presence of asbestos is likely or where the fabric of the buildings is to be modified or disturbed)

- Can demonstrate awareness of ACM and associated risks and to understand the Emergency Procedures for asbestos on site
- Consult the asbestos register or relevant asbestos survey before commencing intrusive work and ensure it is safe to proceed
- Report any defects or suspected ACMs prior to starting / continuing with work
- Ensure that suitable Risk Assessments, Method Statements and Standard Operating Procedures are in place for the specific works being undertaken and these are adhered to
- Ensure that any damaged materials that are suspected to contain asbestos are reported to UAM immediately (via Estates Helpdesk)
- Attend any necessary training when requested

Asbestos Analytical Consultant will

- Hold and maintain UKAS accreditation
- Provide full range of Asbestos Management services including data management, surveying and analytical services and specifications for removal works
- Operate independently of any removal contractor
- Provide support to UAM including on emergency advice

Asbestos Removal Contractors will

- Ensure prior approval is obtained from the UAM that agency workers or sub-contractors can be used for works on University premises, providing relevant information requested
- Ensure that they hold a valid three year HSE full asbestos removals licence to undertake works requested
- Ensure that they hold valid insurances with adequate cover for the works to be undertaken
- Ensure that all works on University premises are in compliance with current legislation and all relevant Approved Codes of Practice and Guidance Notes
- Attend site to assess and prepare quotations. The removal contractor must raise any issues relating to health and safety with the responsible person for managing the works
- Provide a written Plan of Works to the UAM in good time. Emergency procedures/transit routes must be discussed with the UAM, agreement must be obtained before works are permitted
- Notify asbestos removal works to the Health and Safety Executive
- Ensure that removal works will not proceed until the required notification period has passed
- Provide statutory information to the Health and Safety Executive on request.
- Arrange for disposal of asbestos waste materials in accordance with legislation and the University Waste Management Policy
- Comply with the University Contractors Site Rules

CDM Principal Designer

- Assess and provide asbestos information at Pre-Construction Stage

4. Asbestos Register

In order to be able to manage asbestos, the University needs 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, the Asbestos Register compiled.

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

Where a property was built post year 2000 then it is assumed that there is no asbestos containing materials within the building.

The University will maintain one single asbestos register for all UK campuses and buildings. The register will be maintained and be available to relevant parties. As per the responsibilities, the UAM is responsible for ensuring the register is accurate and updated.

The register must contain; details of all surveys, material condition information, material risk assessment information and schedule for re-inspection.

University arrangements detail the requirements for the various monitoring activities.

5. Training, Competency and Supervision

The University will ensure that all relevant staff who may encounter asbestos as part of their daily duties will receive the appropriate level of training as set in the University Competency Policy.

All internal staff that may disturb ACMs during their working activities, or any staff that supervise or influence such work, will have had as a minimum nationally recognised Asbestos Awareness training. All staff will receive Refresher training every 12 months. The Refresher training can take the form of online E-learning or one hour in-house training session. All staff will receive a nationally recognised Asbestos Awareness training course every 3 years as detailed in the list below. The UAM will arrange the training and pass the details to the Line Manager for inclusion on staff's personnel training records.

All contractors used on any maintenance or refurbishment works must have had Asbestos Awareness training or a refresher session within the last 12 months.

The UAM and deputy must hold the qualification listed below and have Refresher training every 3 years.

Role	Training Required
Director of Estates and Facilities (Responsible Person)	Duty to Manage Asbestos training
University Asbestos Manager (Appointed Person)	BOHS P405, P406, P47 qualifications
Deputy Appointed Person	BOHS P405

Role	Training Required
Health and Safety Office (Lead Advisor)	BOHS P405
Asbestos Analytical Consultant (Surveyor)	BOHS P402
Direct Labour	Nationally recognised Asbestos Awareness training, toolbox talk on access to contaminated areas
Contractors / Sub-Contractors	Nationally recognised Asbestos Awareness training
Business Unit Nominated Person / Building Managers	Relevant Asbestos Awareness training as delivered by the UAM and the Health and Safety Office
Estates / Project Staff	Nationally recognised Asbestos Awareness training
Business Unit Staff	Relevant Asbestos Awareness training as delivered by the UAM and the Health and Safety Office

6. Monitoring and Inspection

The University will ensure appropriate monitoring and inspection regimes are in place to manage our asbestos risks.

Additional monitoring and inspection of processes and contractors will be conducted by the UAM. Oversight and audit is completed by the Health and Safety Office.

All identified and presumed ACMs will be re-inspected as per the frequency set by the Asbestos Analytical Consultant on the Asbestos Register.

The University standard is to carry out monitoring and inspection in all areas in accordance with the University Monitoring and Inspection Policy.

The Director of Estates and Facilities will undertake leadership walk round as per University Policy.

Regular internal checks of the Asbestos Management Plan will be carried out according to the relevant procedures. These will examine:

- Whether the re-assessment of known and suspected ACMs is performed on time and the results recorded.
- A review of the list of Asbestos Removal Contractors and asbestos Analytical Consultants.
- A periodic audit of an asbestos project to confirm adequate records are retained.
- Training requirements and records.

The University Asbestos Manager along with the Health and Safety Office will carry out these checks. The Health and Safety Office will audit the system every 3-5 years as per University policy.

The University will undertake air monitoring, as appropriate, to ensure that levels are maintained below the exposure limits as set within this policy.

Re-Inspections

During the re-inspection the Surveyor will assess the condition of the ACM and the surface treatment (sealed, unsealed). They will assess if any changes to the ACM have occurred since the previous inspection, and if the information was recorded correctly. The surveyor will assess if the material assessment or the priority assessment have changed. The surveyor will give a management recommendation based on the findings (manage, encapsulate, remove etc).

The University will use a UKAS accredited Asbestos Analytical Consultant to do the asbestos re-inspections. The Asbestos Surveyor conducting the re-inspection will be competent and experienced to do the task. It is the responsibility of the UAM to assist the surveying company with access to the buildings. The Asbestos Surveyor will send a re-inspection report to UAM within 14 days of completion of the re-inspection on site. The Asbestos Surveyor will update the asbestos register with the re-inspection within 28 days of completion of the re-inspection on site. If any ACMs are found during the re-inspection that pose an immediate risk, the Asbestos Surveyor will inform the UAM immediately from site. The UAM will ensure the area is vacated and isolated until remedial works can be completed.

On receipt of the re-inspection reports the remedial actions recommended will be prioritised and arranged by the UAM.

7. Accidents and Incident Reporting

The presence of Asbestos-Containing Materials in itself does not constitute a danger. However, there is a potential risk to health if such material is disturbed and fibres are released and become airborne. It is the policy of the University to prevent exposure of staff, student, contactors and any other visitor to the University, to airborne asbestos fibres.

In any emergency the primary concern should always be the immediate safety of those affected as a result of an emergency. An emergency procedure is detailed in Section 9 of this policy.

When the immediate situation has been dealt with and people are no longer at risk, the incident must be reported locally, and to the Health and Safety Office who will inform UAM. The Health and Safety Office, in collaboration with the UAM will inform the HSE if necessary. All incidents will be investigated with the aim of identifying lessons learned and preventing similar occurrences in future. Any remedial actions required must be implemented immediately where possible and lessons learnt communicated widely to all who can benefit.

In some cases HSE must be notified by the University Health and Safety Office under the Reportable Incidents, Diseases and Dangerous Occurrences (RIDDOR) regulations. We are required to report any significant exposure to asbestos fibres.

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

If in doubt advice can be sought from the Health and Safety Office

8. Occupational Health and Health Surveillance

The University Occupational Health Service provides services to protect the health of staff and students, at work, in training, and in study, to assess fitness for work, training and study, and to help manage health issues effectively.

Occupational Health staff see clients by appointment. Management referral documents available from the HR website. The staff cannot provide primary care, minor injury or accident and emergency services.

Occupational Health ensure that any exposure is recorded on the employee's medical notes and retain the medical notes for a period of 40 years after the date of exposure.

The record of information must include:

- Name of person
- Date and time of incident
- Nature of exposure (damage or work to ACM, uncontrolled release of asbestos fibre from asbestos removal enclosure etc.)
- Location of incident
- Type of asbestos fibre(s) / asbestos material
- Duration and level of exposure
- Copies of any associated analytical record (e.g. Air monitoring)
- Details of advice given to person (health risks of asbestos etc)

The UAM will provide technical information to Occupational Health for review and a further assessment of health risk.

Whilst the University does not ask employees to carry out activities that would require routine medical examinations. Should this situation change, then provision will be made with our current OH provider.

9. Emergency Plans

Arrangements are in place to deal with emergencies and other untoward occurrences that may take place for all areas where asbestos is disturbed.

An asbestos emergency is where:

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

In all cases the UAM must be contacted immediately.

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

Release of Elevated Airborne Fibre Levels

An asbestos fibre release may occur when:

- Fire within or outside an asbestos enclosure
- Loss of negative pressure (e.g. Negative Pressure Unit fails)
- Enclosure rupture / damage
- Accidental disturbance of un-registered ACMs by operatives and maintenance personnel.

Suspected ACMs Encountered whilst Undertaking Work - Emergency Procedure

1. STOP THE WORK IMMEDIATELY
2. Windows and doors should be closed if it is possible to do so without further disturbance
3. All persons MUST leave the area
4. A list of persons effected to be produced
5. Post an 'Out of Bounds' notice, seal up doorway
6. Contact the University Asbestos Manager (Estates Help Desk)
7. **DO NOT RE-ENTER THE AREA UNTIL ADVISED BY UNIVERSITY ASBESTOS MANAGER.**

Damaged Discovered – All Staff - Emergency Procedure

1. All persons MUST leave the area
2. A list of persons effected to be produced
3. Post an 'Out of Bounds' notice, seal up doorway
4. Contact the University Asbestos Manager (Estates Help Desk)
5. **DO NOT RE-ENTER THE AREA UNTIL ADVISED BY UNIVERSITY ASBESTOS MANAGER.**

The UAM shall assess the emergency 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. Suspected contamination areas must remain out of bounds until cleared by the UAM.