

Guidance Notes For Management of Asbestos

(Ref: QM_OHSD_GA017)

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1.0 Introduction

- 1.1 This document sets out the Asbestos Management Plan for Queen Mary, University of London.
- 1.2 The plan will incorporate the policy and procedures for effective management of Asbestos Containing Materials (ACM's).
- 1.3 It is designed to minimise asbestos related health risks to all Queen Mary personnel and those who visit or conduct their undertakings on behalf of Queen Mary.
- 1.4 The presence of ACM's, provided it is in a stable condition, and does not in itself constitute a hazard. The hazard to health arises when asbestos fibres are disturbed or damaged, whilst not under controlled conditions, and are left in a friable condition.
- 1.5 ACM's present the potential for damage to health when the fibres become airborne in the form of respirable dust, due to activities such as: breaking, sawing, abrasion, cutting, drilling or any type of uncontrolled disruption to their solid state.

2.0 Legal Responsibilities

- 2.1 Queen Mary has an explicit duty to assess and manage the potential risks arising from the presence of asbestos.
- 2.2 The College council has ultimate responsibility for the implementation of the Asbestos Management Plan (AMP).
- 2.3 The Director of Estates is designated as the College Asbestos Duty Holder under the Control of Asbestos at Work Regulation 2006.
- 2.4 This document conforms to the requirements of the Health and Safety at Work Act 1974 and The Control of Asbestos at work Regulations 2006 and other relevant legislation.

3.0 The College policy is:

- To prevent exposure to the health hazards associated with asbestos.
- To ensure that appropriate resources are in place to enable the management of the ACM's including the required levels of surveying, monitoring, encapsulation, labelling, inspection or removal.
- To promote awareness of the Asbestos Management Plan (AMP) and the hazards related to asbestos by training of staff and those working on behalf of Queen Mary.
- To survey all Queen Mary properties.



Guidance

- To provide and maintain an Asbestos Register.
- To conduct six monthly or annual reviews, dependent on assessment, of known ACM's locations.
- To conduct refurbishment and demolition type surveys prior to any works being undertaken, except when there is no legal requirement to do so.
- To remove, where practicable, all known ACM's.
- To provide information, via refurbishment and demolition type asbestos surveys, for those working with or near known ACM's prior to any works being undertaken.
- To develop, implement and review an effective management strategy.
- To develop and implement an emergency response to plan for the accidental release of asbestos fibres due to damage of recorded or unrecorded ACM's
- To regularly review the AMP.
- To ensure the appropriate management structure is in place and has the ability to group report to the College Health and Safety Advisory Group.
- The Asbestos Management Plan, Policy and Procedures apply to all staff and contractors, without exception, and it is incumbent on all staff and contractors to report any suspected or damaged ACM's.

4.0 Asbestos Management Plan Hierarchy

4.1 The Plan sets out the mechanism by which ACM's are managed, it includes details on how it intends to:

- Protect those working on the fabric of Queen Mary properties.
- Protect those working within and those who occupy Queen Mary properties.
- Effectively control any works likely to affect the current condition of ACM's.
- Identify and categorise ACM's and to manage these hazards based on prioritising and assessment of the risk that they present.
- Produce a prioritised programme for the remediation of ACM's that, because of their location and, or condition, could present a risk to health.



5.0 Duties and Responsibilities

- 5.1 The duty to manage asbestos will be assigned to named Directors and Managers employed by Queen Mary, who have appropriate training and expertise in asbestos management.
- 5.2 The Health and Safety Directorate will provide advice and guidance for any ACM related issues.
- 5.3 The following points are not exhaustive; they are an overall guide to the main responsibilities allocated to the different levels of management

5.3.1 Duties of the Principal

The Principal Shall:

- Ensure that Queen Mary has a suitable and sufficient Asbestos Management Plan.
- Ensure that the staff and resources necessary to implement the plan are available.
- The overall strategy for the safe operation and execution of the Policy, Plan and Procedures.
- Devolve strategic aspects of asbestos management to senior College officers including consideration of asbestos management in operational and financial strategies.

5.3.2 Duties of the Chief Administrative Officer

The Chief Administrative Officer will ensure that the asbestos management plan is implemented by:

- Devolving the implementation of the principal functions of asbestos management to the Director of Estates as college duty holder.
- Ensuring that any changes to the plan policy or procedures is agreed by the Director of Health and Safety.
- Charing meetings of the Asbestos Management Group ensuring that issues raised are reported to the Health and Safety Advisory Group.
- Considering asbestos issues as part of the financial and operational management and support the Director of Estates in applications for resources required to implement the Asbestos Management Plan.



- Receiving advice from the Asbestos Management Group and continually reviewing the overall asbestos management strategy.
- Ensuring that all Directors/ Head of Schools/Departments or Institutes are fully aware of the requirements of the Asbestos Management plan.

5.3.3 Duties of the Director of Estates

- To act as Asbestos duty holder on behalf of Queen Mary
- Appoint and maintain the Asbestos Management Group that will consist of a team of suitably qualified staff members of the College Health and Safety Directorate and appointed consultants.
- Appoint Deputy Asbestos Duty Holder(s) who will be responsible for the day to day implementation of the Asbestos Management Plan; including the maintenance of the Asbestos Register.
- Devolve responsibilities for tactical and operational implementation of the Asbestos Management Plan to the deputy Duty Holder(s) who will direct day to day management of asbestos in College properties.
- Ensure necessary resources are available for implementing and maintaining the AMP.
- Monitor effectiveness off the AMP.
- Consult with the Health and Safety Directorate regarding changes to the plan through legislation or improved information

5.3.4 Duties of Appointed Asbestos Duty Holder(s) and Deputies

The duty holder(s) and deputies will:

- Implement the day to day requirements of the College Asbestos Policy, Plan and Procedures.
- Be a member(s) of the Asbestos Management Group.
- Ensure that the Asbestos Register is maintained and up to date.
- Periodically audit the off-site electronic version.
- Receive all Planning Consent Forms and notifications for intended work in areas identified in the Register as containing or suspected to contain ACM's.
- Ensure the emergency procedures are in place and the contact details are up to date.
- Ensure that all relevant staff are trained and that the training is refreshed as necessary or required by legislation.



- Ensure that all Project Managers, Maintenance Managers, Building Surveyors and any other person acting or purporting to act as a manager on behalf of the College on projects involving construction, demolition, refurbishment or maintenance are fully aware of and abide by the Asbestos Management Plan.

5.3.5 Duties of Assistant Director – Properties and Planning

Acquisitions and disposals of property

The Property and Planning section of the Estates Department is responsible for the management of acquisitions and disposals of property, arranging of leaseholds and embedded space.

It does not hold asbestos records, but is responsible for ensuring that:

- Any property purchased by Queen Mary must be subject to an agreed survey prior to purchase.
- Any property disposed of by Queen Mary must have the information from the asbestos register as part of the sale documentation.
- Any potential works to the fabric of the leased or embedded space is notified to the land lord and information relating to the presence or potential presence of ACM's is passed to the Project or Maintenance Manager prior to any work commencing.

5.3.6 Duties of Directors/Heads of Departments/Schools/Institutes

Directors/Heads must ensure that:

- They are aware and that staff are aware of the AMP.
- All small works which may alter or puncture the fabric of a building must be notified, in good time, by the Planning Consent Form system operated by the Estates department.
- Any larger works which may alter or puncture the fabric of a building, must be agreed with the Projects office.
- Departmental equipment which contains or has the potential to contain ACM's is inspected by the appointed asbestos survey company, see section 6.3.

6.0 Asbestos Management Plan

6.1 Surveys

Current legislation requires all buildings constructed prior to 2000 to have, as a minimum, a Management survey, (Previously surveys type 1 and 2) this is a basic non-intrusive survey which is designed to identify any potential areas where ACM's may be present.



A Refurbishment and Demolition survey is a fully intrusive survey which, is required by law, to be conducted prior to any works which may disturb the fabric of a building constructed prior to 2000.

This plan requires that:

- Management and or Refurbishment and Demolition Surveys are to be conducted by a Queen Mary approved asbestos surveying company and are to be compliant with current legislation.
- All buildings constructed prior to the year 2000 are to have, as a minimum, a Management survey.
- Any works which have the potential to disturb any ACM's, including maintenance, cabling, refurbishment or demolition, must have either been checked against the Asbestos register and written proof obtained that proves the area is clear of ACM's or had a Refurbishment and Demolition survey prior to any undertaking, if the building is constructed prior to the year 2000. *(see further Maintenance and Projects works paragraphs).*
- Any residual recorded ACM's identified by survey must be re-surveyed annually or as required by the risk assessment of the individual area. The assessment based on the survey findings, will be assigned to each identified ACM. The assessment combines the Algorithm Generated Material Assessment (product type, damage/condition, surface treatment, asbestos type) and the Algorithm Generated Priority Assessment (location, material extent, use of location, occupancy levels, activities carried out, likelihood and frequency of maintenance activities). The risk assessment forms the basis of the asbestos management plan and is used to determine necessary control actions and future management.
- Hard copies will be held as part of the plan within The Estates department and electronic copies held by the Occupational Health and Safety Directorate and/or appointed company.
- Electronic copies of the asbestos survey will be prepared and held at an off-site location with 24 hour access for authorised users
- In accordance with the current legislation, if the survey is unable to specifically determine the presence of asbestos (e.g. where demolition would be required to provide conclusive evidence) it MUST be presumed that ACM's are present. This will be clearly indicated on the survey, labelling and recorded in the register

6.2 Asbestos Register

- The asbestos register is required, by law, to contain all know locations, condition and latest survey information of recorded ACM's.



- It is held, as a hard copy by the Estates Department and an electronic copy by the Health and safety Directorate, (it may also be held off site to comply with the requirements of the Emergency plan by an appointed third party).
- An electronic version of the register should allow read only access to:
 - Project office
 - Maintenance
 - Health and Safety
 - Security Supervisors
- Security Supervisors will access the register, in the event of an emergency, in order to brief the emergency services on the presence of asbestos related hazards
- The system MUST be updated after each inspection or where a removal or any asbestos related works have taken place.

6.3 Departmental Equipment

Any equipment, which has the potential to or is suspected of containing ACM's must be inspected by the survey company if:

- There is any indication that the equipment or it's intended use may indicate that it has the potential to contain ACM's.
- There is any concern or expectation that the equipment may contain ACM's.
- There is noticeable deterioration in the condition of any suspected or known ACM's.
- The equipment is to be made redundant or to be disposed off.

6.4 Projects

Assistant Director of Estates, Projects, must ensure that:

- All internal and external project managers are fully trained to the appropriate level, are aware of and comply with the requirements of the AMP.
- Sufficient time is allowed in planning a project where ACM's are or may be present.
- Sufficient resources are available to the project manager to facilitate the safe removal of ACM's or encapsulation of residual ACM's.
- In conjunction with the Health and Safety Directorate, they audit a percentage of projects to ensure the AMP is being adhered too.



6.5 Project Manager

Project manager must ensure:

- That the project has the correct level of survey in any building constructed prior to 2000 and must have been checked against the asbestos register and that written confirmation is obtained by them as to the effect that the area is clear of any ACM's.
- This information must be passed to both the main contractor and the CDM-Coordinator, if appointed, prior to commencement of any works and will form part of the health and safety file.
- Where ACM's are present, the project manager, in conjunction with the health and safety directorate and the appointed asbestos consultant, will assess the likely impact and agree either a plan of removal or, if not applicable or practicable, then a plan of encapsulation and labelling.

Assistant Director of Estates, Maintenance, must ensure that:

- All internal and external maintenance managers are trained to the appropriate level, are aware of and comply with the requirements of the AMP.
- Sufficient time is allowed in planning of any maintenance task where ACM's are present or where it is suspected that they are present.
- Sufficient resources are available to the maintenance manager to facilitate the safe removal of ACM's or encapsulation of residual ACM's.
- In conjunction with the Health and Safety Directorate, audit a percentage of maintenance tasks to ensure the AMP is being adhered to.

6.6 Maintenance Manager

The maintenance manager must ensure:

- That the areas where the maintenance tasks will be conducted in any building constructed prior to 2000, must have been checked against the asbestos register and that written confirmation obtained by them as to the effect that the area is clear of any ACM's.
- This information must be passed to either the maintenance operative and/or a contractor prior to any work being undertaken.
- Where ACM's are present, the maintenance manager, in conjunction with the health and safety directorate and the appointed asbestos consultant, will assess the likely impact and agree either a plan of removal or, if not applicable or practicable, then a plan of encapsulation and labelling.



Training

The Director of Estates will ensure that a suitable level of expertise is available either by in-house training of employees or by using external training courses or resources.

The intention is to provide an open and responsive culture where individuals have an awareness of the risks and an appreciation of the effectiveness and suitability of, and requirement for, management procedures.

7.0 Working procedures

All intrusive works, in buildings constructed prior to 2000 or equipment containing or suspected to contain ACM's, must be checked against the register prior to commencement.

7.1 Recorded Areas

If an area is recorded in the register it is the duty of the manager to ensure that the information is that of a refurbishment and demolition survey. If not the area must be surveyed and the latest survey added to the register.

If the survey proves negative then it is safe to proceed.

If the survey proves ACM's are present then it must be decided, dependent on the reasonably practicable approach and the condition and likelihood of damage or disturbance to the ACM's, whether to encapsulate or remove.

7.2 Unrecorded Areas

If an area is not recorded then a refurbishment and demolition survey must be undertaken.

If the survey proves negative then it is safe to proceed.

If the survey proves ACM's are present then it must be decided, dependent on the reasonably practicable approach and the condition and likelihood of damage or disturbance to the ACM's, whether to encapsulate or remove.

7.3 Survey Results.

If the survey is negative, then works may proceed and written confirmation of the results added to the health and safety file or building file.

If the survey is positive, the appointed asbestos management company will advise as to the possible procedures dependent on the reasonably practicable approach and the condition and likelihood of damage or disturbance to the ACM's.

7.4 Appointment of an asbestos removal contractor.

Queen Mary has a frame work agreement with appointed asbestos removal companies. In consultation with the asbestos consultant, the



manager should appoint or tender one of the approved companies to undertake the required works.

7.5 Appointment of an Analytical Company

An independent licensed analytical company must be appointed by the manager, with advice from the asbestos consultant.

7.6 Works Undertaken by Non-Licensed Contractors

Current legislation allows for non-licensed contractors to remove some forms of asbestos. This should only be allowed after consultation with the health and safety directorate and the appointed asbestos consultant.

8.0 Emergency procedures

Definition of an emergency

Emergencies are unexpected situations requiring sudden and urgent action. In the context of asbestos the immediate measures taken should prevent or minimise exposure to airborne asbestos fibre.

Following this action there may be a subsequent requirement to bring in specialist contractors such as an UKAS accredited Analytical Consultancy or Licensed Contractor. The Asbestos Manager will assess and arrange suitable arrangements, and if appropriate inform the campus Main Security Desk.

The following emergency situations are considered:

Personnel in areas of potential elevated airborne asbestos fibre For example:

- Known or suspected ACMs are damaged
- Asbestos remedial works cause an uncontrolled release of airborne fibres, for example if an asbestos removal work enclosure is damaged

Action to be taken:

- Do not disturb the material or stay longer in the affected area than is essential
- If the problem is within, or associated with, a Project area, contact the Site or Project Manager. If the issue is not project related contact the Estates Help Desk.

The Site Manager/Help Desk will then contact the Asbestos Manager who will provide site specific advice.

- If the emergency relates to a damaged ACM, and it is safe and appropriate to do so, cover the material with polythene or other barrier to prevent disturbance by air currents.
- Seal off the area – close windows, doors etc so long as this is possible without causing further disturbance to the material/staying longer in the area.



- Evacuate the local area and prevent others from entering the area by using signage, sealing up doorways or posting guards at an appropriate distance.

Additionally for Project Areas:

The Site Manager should halt all local works and take any necessary or recommended action.

Such action may include informing staff and building occupants, clearing the area or site etc.

The Project Manager must be informed of all developments. General, contractor specific and site health and safety reporting procedures may be triggered by these events.

Where the emergency has been caused by finding damaged ACMs it is likely that the longer term action will be the removal of the material, with the costs borne by the project.

Non specialist personnel required to enter areas of elevated airborne asbestos fibre

No untrained personnel are permitted within an asbestos enclosure. Should there be a need for specialist personnel to access equipment within the area they will:

In the first instance relay, via the outside man, information to those working inside the enclosure.

If this is not practicable or considered to be dangerous, then a clean area will be constructed through the work area to the equipment which requires attention.

Action Plan

The Action Plan will contain priorities and timetables or targets for both remedial works e.g. removal works and non-remedial works e.g. training issues, survey requirements.

Consideration of a timetable for remedial works will take account of several factors including:

- ACM risk assessment score
- Building occupation constraints
- Financial resources
- Other planned building works.

The Head of Maintenance will review the Action Plan; the Plan will be finalised by the Health & Safety Director – Estates.

Action Plans will be included within the AMP Review, and later retained as archive documents, kept by the Head of Maintenance.

Review purpose

The Head of Maintenance will arrange a regular review of the AMP.



The intention of the review will be to assess:

- Management procedures and their effectiveness.
- Effectiveness of the management plan in terms of its integration into all matters relating to the building fabric and use
- Overall progress made against the Action Plan
- Suitability and maintenance of communication, instruction, training of personnel, employees and contractors
- Suitability and success of record keeping tasks

Significant findings and comments will be reported to the Director of Facilities Management. A record of the Review will be kept by the Head of Maintenance.

Review Timetable

The Head of Maintenance will set the timetable and date of the next review.

A Review will be:

- Carried out on a 12 monthly basis
- Considered when significant events occur - for example, on completion of major asbestos removal projects, following exposure of personnel to significant airborne asbestos fibre levels, transfer or increase of premises, or if arrangements within the AMP are no longer considered to be adequate.

Review Attendees

The Head of Maintenance will invite appropriate representatives.

Review Agenda

The Head of Maintenance will set the Agenda and will distribute to all relevant personnel in sufficient time for data and feedback to be collated.

The agenda will include some or all of the areas set out below:

AMP

Compliance with HSE and Imperial College procedures
Management and Organisation structure
Audits and Reports

Action Plan

Remedial Works

Asbestos Register

Asbestos awareness/training

Incidents with ACMs

HSE reports



Document Control

Initial Data

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Position:	Director of Occupational Health and Safety
Status:	Version 1
Date of Issue:	August 2012

