Asbestos Management Policy
(Version 3)
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Introduction
This Asbestos Management Policy outlines the arrangements adopted by the College to prevent, so far as is reasonably practicable, staff, contractors, students and visitors being exposed to asbestos in a manner that could adversely affect their health. The arrangements are based on the requirements contained in the Control of Asbestos Regulations 2012 and accompanying Approved Code of Practice, Managing and working with asbestos (L143), together with other legislative and best practice performance standards.

This Policy should not be considered a definitive guide to the management of asbestos and the requirements of the Regulations. Where any doubt exists as to the action to be taken, or advice or assistance is required, contact should be made with the College’s Asbestos Manager or the Director of Health and Safety.

Copies of those documents referred to above and other useful reference material are available from the College’s Asbestos Manager or the Director of Health and Safety, and information is available on the Health & Safety Executive website.

This policy covers work of any kind involving the removal, handling, and disposal of any material containing asbestos.

College Policy Statement for Asbestos Management

1. The College is committed to providing a safe environment for its students, employees, contractors and visitors, by conducting its business in a way that protects the health, safety and welfare of each individual. The College, therefore, recognises its responsibility to prevent staff, students, visitors and contractors being exposed to asbestos containing materials. The College is responsible for ensuring that:

   ▪ The College’s Asbestos Management Plan and all associated Codes of Practice and procedures are effectively applied to reduce, as far as reasonably practicable, the risk of exposure to asbestos fibres.
   ▪ Suitable arrangements are in place to enable staff, who may during the course of their work encounter asbestos, to attend asbestos awareness training appropriate to their area of work and level of responsibility/duty.
   ▪ An accurate up to date asbestos register is in place, detailing the location of all known Asbestos Containing Material (ACM) within all buildings throughout the College’s estate.
   ▪ An effective asbestos management plan, based on risk assessment, is in place to ensure that all asbestos-containing materials are maintained, sealed and labelled, isolated, or removed safely.
   ▪ Resources are applied effectively, to address asbestos issues and to prevent, as far as is reasonably practicable, exposure to asbestos fibres.
   ▪ Reference is made to the asbestos register as and when required, by the Asbestos Manager/Approved Asbestos Consultant to ensure that all ACMs have been identified and addressed prior to commissioning/undertaking any form of maintenance/refurbishment work.
   ▪ Asbestos information is available to affected staff and contractors, by means of access to the College’s asbestos register.
   ▪ This Asbestos Management Policy and Management Plan are reviewed on a regular basis and at least every two years for the policy and annually for the Plan.

Objectives

2. Compliance with the requirements of this Policy will ensure:

   a) The College meets its statutory obligations in respect of The Control of Asbestos Regulations.
   b) The health protection against exposure by inhalation of asbestos fibres of staff and students, whilst working in College buildings having asbestos containing materials.
   c) The health protection of others (including contractors, visitors, members of the public).
   d) The safe management of all asbestos containing materials.
   e) Everyone is aware of their roles and responsibilities.
   f) That affected staff (and others, including contractors) who are liable to disturb asbestos during their normal work activities are appropriately informed, instructed, and where necessary trained and supervised.
3. In meeting these objectives, the College will:

- Clearly define the organisational arrangements for achieving compliance (see Roles and Responsibilities);
- Ensure resources are made available to achieve compliance and will operate on the principal that where asbestos is identified as presenting a risk because of its unstable condition or where there is a distinct likelihood it will be disturbed, it will be removed, sealed or encapsulated or such other method as appropriate;
- Take reasonable steps to find out if there are materials containing asbestos within its premises, and if so, its amount, location and condition (see Asbestos Survey and Register);
- Presume materials contain asbestos unless there is strong evidence that they do not;
- Make, and keep up-to-date, a record of the location and condition of the asbestos materials or materials which are presumed to contain asbestos (see Asbestos Survey and Register);
- Assess the risk of anyone being exposed to fibres from the materials identified (see Risk Assessment);
- Prepare and implement a plan that sets out in detail how the risks from asbestos will be managed (see The Asbestos Management Plan);
- Periodically review and monitor the plan and the arrangements to act on it so that the plan remains relevant and up-to-date (see The Asbestos Management Plan);
- Provide information on the location and condition of the materials to anyone who is liable to work on or disturb them and promote an awareness within the wider College community of the hazards presented by asbestos (see Information, Instruction and Training);
- Establish contingency arrangements to deal with any inadvertent release of asbestos fibres into the environment (see Reporting Suspected Asbestos Damage);
- Appoint an Asbestos Manager (and nominated Deputy) to ensure the requirements of this Policy and other College performance standards are met;
- Review asbestos management arrangements periodically or whenever there are changes in relevant legislation, guidance or College activities (see Asbestos Management Review Group and Asbestos Management Audit).

4. The content of the Regulations can be obtained from the Asbestos Manager.

Application of Policy

5. The Asbestos Manager is responsible for monitoring the condition of ACM. Where existing installations include ACM which is in good condition, not releasing dust, and not subject to abrasion or damage, the material will be left undisturbed. Details will be noted in the Asbestos Register, and the installation re-inspected annually, to ensure that the condition of the material has not changed.

6. Where existing installations include asbestos-containing material which is damaged, deteriorating, or inadequately sealed, it will either be removed and replaced by suitable material not containing asbestos, or resealed or encapsulated. Details are to be noted on the Asbestos Register by the Asbestos Manager, and the installation is to be re-inspected annually to ensure that the condition of the material has not changed.

7. The Asbestos Register is regularly updated by the Asbestos Manager as information becomes available, and this is reviewed annually, to enable them to make such recommendations to the College as appropriate to pursue this policy.

8. Information contained in the Asbestos Register is held by the Asbestos Manager, and brought to the attention of any employee or contractor whose work may entail disturbance of the asbestos-containing material.

9. To do any building or maintenance work in the premises, or on plant or equipment that might contain asbestos, all contractors are shown the Asbestos Register by the Asbestos Manager.

10. The Asbestos Manager is responsible for undertaking and reviewing asbestos risk assessments i.e. the identification of where it is, its type and condition; making an assessment of the risks and managing and controlling these risks.

11. Licensed work includes most asbestos removal, all work with sprayed asbestos coatings and asbestos lagging, most work with asbestos insulation, and asbestos insulating board (AIB).
12. Licensable work with asbestos is work:
   - where worker exposure to asbestos is not sporadic and of low intensity; or
   - where the risk assessment cannot clearly demonstrate that the control limit will not be exceeded i.e. 0.1 asbestos fibres per cubic centimetre of air (0.1 f/cm³); or
   - on asbestos coating or lagging
   - on asbestos insulation or asbestos insulating board where the risk assessment demonstrates that the work is not short duration work, e.g. when work with these materials will take no more than two hours in any seven day period, and no one person works for more than one hour in that two hour period.

13. If College Staff or Contractors are carrying out non-licensed asbestos work, this still requires effective controls.

Licensed Asbestos Contractors

14. The Director of Estates has established a framework for Asbestos Remediation Contractors for works necessary for the removal or repair of asbestos containing materials. The Asbestos Manager will co-ordinate all aspects of asbestos work including abatement/remediation works undertaken by licensed asbestos contractors and all reassurance activities that are undertaken by the College’s Appointed Asbestos Contractor.

Roles and Responsibilities

15. In meeting its statutory obligations, the College has instituted the following organisational arrangements:

16. The Director of Estates has overall responsibility for implementing the requirements of this Policy, including:
   - Implementing a management system which ensures that maintenance/building work is organised such that maintenance staff and contractors do not unknowingly work on asbestos, and whenever they knowingly work directly with or near such material, it is adequately controlled;
   - Appointing an Asbestos Manager (and nominated Deputy) to assist them with the execution of their responsibilities and agreeing the arrangements for their involvement in any works, along with such other measures necessary for the execution of this role holder's duties;
   - Formally identifying the roles and responsibilities of their staff in respect of the day-to-day management of maintenance/building work;
   - Applying for such resources as are appropriate to discharge the College’s statutory obligations;
   - Periodically reviewing, with the Asbestos Manager (and other relevant duty holders), the effectiveness of the above management system.

17. The above management system will be formally documented within an ‘Asbestos Safe Operating Procedure’ that identifies the operational requirements and organisational arrangements for implementation.

18. The Head of Maintenance Services is responsible for:
   - Ensuring that the requirements of this Policy are implemented and for drawing to the attention of the Asbestos Manager and Director of Estates any matters which may inhibit the execution of this Policy and which lie outside of the post holder’s remit to resolve;
   - The application of, and allocation of, resources towards the effective management of asbestos issues;
   - Receiving advice from the Asbestos Manager on the inclusion/suspension/removal of asbestos related contractors and acting upon such advice;
   - Ensuring the Asbestos Manager arranges suitable initial and updated training with respect to asbestos issues where appropriate.

19. The Asbestos Manager will ensure that urgent contact can be responded to. The Asbestos Manager’s telephone number during normal working hours is ext. 4637 (01784 414637). Contact outside normal working hours should be made via the security telephone number ext. 444 (01784 443888).

20. The Asbestos Manager is a ‘suitably qualified’ member of staff and is responsible for:
   - Overseeing the management of asbestos at an operational level;
   - The provision of advice and guidance on the management of asbestos;
   - Maintaining the College's Asbestos Register and all associated records, and bringing it to the attention of all maintenance staff and contractors;
   - Day-to-day management of the Asbestos Framework Contract;
• Overseeing the day-to-day implementation of any management system which ensures that maintenance/building work is controlled such that maintenance staff and contractors do not unknowingly work on asbestos containing materials;
• Overseeing the day-to-day implementation of any management system which ensures the adequate control of work with or in proximity to asbestos containing materials;
• Producing and updating the Asbestos Management Plan;
• Producing, and where necessary updating, the ‘Asbestos Safe Operating Procedure’ and ‘Guide to Asbestos in the Workplace’;
• Facilitating the provision of appropriate staff training, including asbestos awareness training;
• Investigating all incidents of inadvertent release of asbestos fibres, bringing their findings to the attention all duty holders, including the Director of Health and Safety;
• Arranging the inspection of materials potentially containing asbestos that are not on the Register, and advising on any remedial action following 'positive' identification;
• Liaising with departments and informing staff (and others) who may be affected by asbestos-related works (e.g. programmed removals);
• Keeping relevant duty holders informed of changes in legislation which could impact on any existing management arrangements;
• Chairing the Asbestos Management Review Group;
• Undertaking or overseeing asbestos risk assessments and bringing them to the attention of contractors and other relevant College staff;
• Developing procedures to enable other departments and contractors to make requests for information regarding asbestos, affecting staff and contractors;
• Assessing, reviewing and recommending changes to the management plan or asbestos risk assessments following periodic inspections, changes in regulations and/or current good practice;
• Overseeing asbestos management contracts in association with refurbishment contracts through the Estates Department, and ensuring they are carried out by competent contractors;
• Monitoring and discussing the performance of preferred contractor/s with regard to the compliance with procedures for asbestos management and discuss deficiencies with the Director of Estates;
• Assessing the medical surveillance needs for all relevant staff carrying out notifiable non licensed asbestos work: this is a requirement by 30 April 2015.

21. The Deputy Asbestos Manager will be responsible for the above duties in the post holder’s absence.

22. Any member of staff or contractor that may disturb asbestos containing material as part of their day-to-day activities must:
• Work in accordance with the findings of any asbestos risk assessment, and the requirements of any information, instruction and training provided by the Asbestos Manager;
• Immediately report to the Asbestos Manager (or nominated Deputy) any incident involving asbestos, including any suspected inadvertent release of asbestos fibres using the College's Accident/Incident Report Form; any subsequent work in these affected areas may be designated as notifiable non-licensed work.
• Immediately stop work if suspected asbestos containing material is discovered during any works, and immediately seek the advice of the Asbestos Manager (or nominated Deputy).

23. The Director for Health and Safety is responsible for:
• The provision of advice and guidance on the application of legislative requirements;
• Where necessary, liaising with the enforcement authorities;
• Ensuring that asbestos-related incidents are appropriately investigated and records are kept for a minimum of 40 years;
• Monitoring compliance with the requirements of this Policy.

Asbestos Survey and Register

24. All the College’s academic, administrative and accommodation buildings, together with any other plant and equipment have been subject to an asbestos Management Survey undertaken in accordance with the provisions of HSG264 Asbestos: The survey guide (2010). From such surveys the location, form, type and condition of any asbestos have been recorded. The results of surveys are contained in the Asbestos Register which is held electronically and can be accessed by contacting the Asbestos Manager.
25. The survey is in the form of a ‘Management Survey’, unless a specific area is subject to the requirement to undertake a ‘Refurbishment and Demolition Survey’. College staff and contractors are required to consult the asbestos register before doing any work that may result in disturbance of the substance. If there is any doubt that asbestos may be present, work must proceed on the assumption that it is and all appropriate controls shall be implemented; including the wearing of appropriate personal protective equipment i.e. coveralls, respiratory protective equipment, appropriate footwear (not lace up boots).

26. Maintaining the College Asbestos Register will form the basis of managed access for authorised in-house staff and contractors who may need to work on or disturb asbestos containing material.

27. It should be noted, that whilst the Management Survey will have identified a vast amount of the ACMs previously utilised in building materials across the estate, ACMs will remain undetected in areas that are outside of the parameters of a Management Survey and within those areas that were not possible to access at the time of the survey. Given these restrictions, it is quite probable that ACMs will remain undetected within the building fabric/structure throughout the estate.

28. All asbestos investigations/sampling are to be undertaken by the College’s Approved Asbestos Contractor, who are fully qualified to undertake such works. These works must be coordinated by the College’s Asbestos Manager and no College staff member shall be permitted to commission such survey works or obtain samples for assessment purposes.

29. A full re-inspection survey of visible/accessible ACMs across College premises is carried out annually to assess the condition of asbestos. Where asbestos is identified as having degraded/become damaged and following assessment is considered to be in an unsatisfactory condition, it will be repaired or removed. When asbestos is removed or encapsulated, the asbestos register is updated to reflect the amendments and all associated certification is recorded on the asbestos register. The details contained in the register are available to all College staff and contractors and the Asbestos Manager provides access to this information.

Labelling

30. Asbestos labels will be used where appropriate throughout the estate. The labels will identify not only those materials that are known to contain asbestos fibre, but also clarify those areas where access has been restricted due to the presence of asbestos, and locations where ACMs exist to the rear of non-asbestos materials.

Notification of Work

31. The Asbestos Manager/College Project Manager will ensure that any planned maintenance/refurbishment work in College buildings that involves the abatement/remediation of asbestos materials is brought to the attention of the Head of Department/School/Managers and/or Departmental Health and Safety Coordinators prior to the work commencing.

32. A briefing will also take place with key departmental personnel to outline the scope of the work, the likely timescales and what precautions will be in place to protect staff from asbestos exposure. This does not apply to emergency situations requiring immediate action.

Reporting Suspected Asbestos Damage

33. If staff, students or contractors discover what they believe to be damaged asbestos containing materials, they should secure the room/area and prevent further access, and contact the Asbestos Manager. Depending on the Asbestos Manager’s assessment of the situation, consideration will be given to displaying temporary signage and/or partially or completely evacuating the area. Arrangements will then be made to carry out appropriate sampling and, if necessary, further remedial action.

34. In exceptional cases, designated staff may be allowed to enter areas containing friable asbestos to attend to plant. This however will only be permitted under strict controls, including a risk assessment/permit to work of the proposed work and the wearing of appropriate coveralls and respiratory protective equipment. This applies even in operational emergency situations.
Risk Assessment

35. The risk assessment forms the basis of asbestos management and will be used to determine the management and control actions necessary i.e. arrangements for the inspection and control of asbestos such as removal, sealing, encapsulation or such other methods as may be identified as appropriate.

The Asbestos Management Plan

36. This is a recorded electronic management plan setting out how the risks identified from asbestos will be managed.

37. The Asbestos Manager will produce a schedule of inspections of ACMs which will form part of the Asbestos Management Plan.

38. The Plan will identify a risk assessed priority listing for the removal and treatment (including encapsulation) of ACMs based on the results of the surveys and contents of the Asbestos Register. It will cover occasions where action is required to deal with situations which arise from routine maintenance requirements not previously identified.

39. The Plan will form the basis for the College’s annual, planned expenditure for the management of asbestos.

40. The Asbestos Management Plan will be reviewed annually.

Personal Protection and Hygiene

41. Work on ACM is strictly controlled and to achieve this there are strict procedures on personal hygiene and for the disposal of protective clothing which must be observed at all times. The Asbestos Manager should be contacted for further detailed procedures on this requirement.

Information, Instruction and Training

42. All technical and maintenance staff and others who may need to take the precautions in this policy into account, will be supplied with a copy by their Line Manager/Head of Department. They will be required to attend asbestos awareness training sessions at the level deemed to be applicable for their role/duties.

43. Affected staff will be reminded annually by their Line Manager of asbestos risks via the ‘Guide to Asbestos in the Workplace’ document and will attend refresher Asbestos Awareness training. The Asbestos Manager should be contacted for advice on the level of training to be received.

44. New Members of College Staff and Contractors will be required to be trained in the Asbestos Management Policy as part of their induction training held on their first day of employment.

45. The line manager will arrange any further training identified to be necessary due to the nature of the post holders duties within the first week of employment and before they have the potential to come into contact with ACM’s. They are advised to contact the Asbestos Manager for further advice on the level of training to be received and to support their training.

Additional Training

46. The Asbestos Manager and Deputy Manager will hold the BOHS Proficiency Module P405.

Departmental Equipment

47. Some departmental equipment may contain ACM’s, e.g. ovens and other high temperature equipment. Staff should ensure that, if asbestos is suspected and the equipment is not currently labelled confirming the presence of asbestos, that the Asbestos Manager is notified so that it can be added to the Asbestos Register and adequately labelled. Any future use and repair of the equipment should only be allowed if disturbing the
asbestos is avoided. If the equipment needs to be disposed of, then the Asbestos Manager must be contacted to arrange controlled and safe disposal via a licensed contractor.

48. If equipment needs to be dismantled, please contact the Asbestos Manager.

49. The disposal of any waste containing/contaminated by asbestos is strictly regulated. This can be organised by contacting the Asbestos Manager.

Asbestos Management Review Group

50. The Asbestos Management Review Group will meet at least annually and will comprise of the following members of College staff:

- The Asbestos Manager (Chair)
- The Deputy Asbestos Manager (Secretary)
- The Director of Estates
- The Director of Health and Safety
- The Head of Maintenance Services (Estates)

51. The Asbestos Manager will present his formal report of the proceeding twelve months, which will include a review of the asbestos work undertaken and the procedures applied, and put forward recommendations for the Group to consider or approve.

52. The overall purpose of the Group will be to review, on behalf of the College, that the Estates Department has/is taking all appropriate measures to meet the requirements of the Asbestos at Work Regulations and other relevant legislation,

Asbestos Management Audit

53. In addition to ongoing monitoring conducted by the Asbestos Manager, compliance with the requirements of this Policy will be reviewed by members of the College Health and Safety Office during the health and safety audit process.

54. This Policy forms part of the College Health and Safety Policy.

Elaine Cassidy
Health and Safety Officer (Auditor)
Version 3

Approved by: Planning and Resources Committee
Date: 7th July 2014
To be reviewed: before July 2016