

ROYAL HOLLOWAY, UNIVERSITY OF LONDON

ASBESTOS MANAGEMENT POLICY

(Version 2)

This Policy defines the College's arrangements for the management of asbestos and the measures to be taken for the protection of staff, students and visitors to its premises. The arrangements are based on the requirements contained in the *Control of Asbestos at Work Regulations 2006* and accompanying Approved Code of Practice, *The Management of Asbestos in Non-Domestic Premises* (L127), together with other legislative and formal requirements and best practice.

Asbestos will not present a risk to persons unless its disturbance or damage releases fibres into the air. For any member of staff who, in the course of their duties, may create such conditions, the College is committed to providing them with information, instruction and training. From this they can identify and recognise the presence, or suspected presence of the substance, the risks associated with it, and the procedures that must be followed for its control, their own protection and the protection of others.

The College has an Asbestos Register that contains the findings of asbestos surveys carried out on each of its structures in which the substance was either used in its initial construction or in subsequent works. Such surveys are in the form of an asbestos 'Management Survey', (formerly known as a 'Type 2' survey), unless a specific area is subject to the requirement to undertake a refurbishment and 'Demolition Survey' (formerly known as a 'Type 3' survey). Where asbestos is identified as presenting a risk to persons because of its unstable condition or there is a distinct likelihood that it will be disturbed, the College is committed to its removal. In this respect, it is a condition of any work that may result in disturbance of the substance that College staff and any contractor shall be required to consult the asbestos register before doing so. If there is any doubt that it may be present, work must proceed on the assumption that it does and all appropriate controls shall be implemented, including the wearing of appropriate personal protective equipment. In all cases, the protection of College staff, students and visitors to its premises from the release of fibres, shall be of paramount importance.

Where it is identified that disturbance of the material may occur, this must be undertaken under managed conditions in accordance with the findings of a risk assessment. Where removal is necessary, risk assessment of the process by a 'competent' organisation will be required before such works may proceed; they will be conducted strictly in accordance with the findings of the risk assessment and in accordance with relevant legislative requirements.

In its commitment to meeting the above, the College will:

- Conduct asbestos surveys, taking all reasonable steps to determine the location and nature of asbestos.
- Keep and update a register of the location, condition, maintenance and removal of asbestos material.
- Manage all aspects of asbestos materials that are to remain in place by means of a management plan incorporating all legislative obligations placed on the College.

- Inform anyone who is likely to disturb asbestos containing material about its location and condition.
- Appoint an Asbestos Manager to ensure the requirements of this Policy and all statutory and best practice obligations placed on the College are met.
- Provide Facilities Management and any other College staff identified necessary with annual asbestos awareness/refresher training

Section 1 – Objectives of the Policy

The objectives of this Policy will be achieved by the measures identified in i – vi below.

- i. A College Asbestos Register will be maintained and form the basis of managed access for authorised in-house staff and those external personnel who may have a need to disturb the fabric of its buildings.
- ii. The College is committed to promoting an awareness of the hazards presented by asbestos to its staff by annual awareness/refresher training and the methods for bringing its presence or suspected presence to the attention of College and any external personnel.
- iii. The planned management of asbestos and prevention of its disturbance, thereby preventing exposure to the hazards associated with asbestos.¹
- iv. Reviewing at periods identified from the risk assessment process, arrangements for the inspection and control of asbestos such as removal, sealing, encapsulation or such other methods as may be identified as appropriate.
- v. Take such measures as are appropriate to ensure compliance with the requirements of the Control of Asbestos at Work Regulations 2006 and associated formal duties placed on the College.
- vi. Identifying the contingency management arrangements necessary to deal with an inadvertent release of asbestos fibres into the environment having the potential to cause harm.

Section 2 – Organisation and Arrangements for Carrying Out the Policy

In meeting its statutory obligations, the College has instituted the organisational arrangements for asbestos management detailed below.

Director of Facilities Management

Has the overall management of asbestos within the College, including ensuring all relevant policies and procedures are in place and for obtaining such resources as are appropriate to discharge the College's statutory obligations.

¹ Under the Control of Asbestos Regulations 2006, the exposure of persons must be below the airborne exposure limit (Control Limit) for all types of asbestos of 0.1 fibres per cm³. A Control Limit is a maximum concentration of asbestos fibres in the air (averaged over any continuous 4 hour period) that must not be exceeded. In addition, short term exposures must be strictly controlled and worker exposure should not exceed 0.6 fibres per cm³ of air averaged over any continuous 10 minute period using respiratory protective equipment if exposure cannot be reduced sufficiently using other means.

Maintenance and Services Manager (FM)

Responsible for ensuring that the requirements of this Policy are implemented and for drawing to the attention of the Asbestos Manager and Director of Facilities Management any matters which may inhibit the execution of this Policy and which lie outside of the post holder's remit to resolve.

Asbestos Manager

Responsible to the Maintenance and Services Manager for the day-to-day implementation of the College's Asbestos Management Policy, including the undertaking of, or overseeing the conduct of, asbestos risk assessments. The post holder has delegated responsibility for developing and maintaining the Estate Services, Asbestos Code of Practice and Guidance document. This document is essentially for the use of Facilities Management staff who may, during the course of their duties, come into contact with asbestos containing material and will supplement the asbestos information, instruction and training that each receives.

The post holder will also develop a 'Guide to Asbestos in the Workplace' essentially for the use of Estate Services staff but also for any other personnel within the College who may, during the course of their normal duties, come into contact with the material.

Health & Safety Adviser

Has responsibility for the provision of guidance, advice and where necessary direction, on the application of legislative requirements and for undertaking an annual audit of compliance with this College Asbestos Management Policy.

Section 3 – The Asbestos Survey and Asbestos Register

All the College's academic, administrative and accommodation buildings, together with any other relevant structures have been subject to an asbestos Management Survey (formerly known as a Type 2 survey), undertaken in accordance with the provisions of *HSG264 Asbestos: The survey guide* (2010) replacing *MDHS 100 Surveying, sampling and assessment of asbestos –containing materials*. From such surveys have been recorded the location, form, type and condition of any asbestos which has been identified. The results of surveys are contained, building by building, in the Asbestos Register which is held in the Estate Services Department.

Staff are required to consult the Asbestos Register before undertaking work on College buildings which has the potential to disturb asbestos fibres. This requirement also applies to any person within another College department who undertakes work which may lead to the disturbance of asbestos or to a contractor engaged from outside the College. In the event that there is any doubt that a structure may contain asbestos, or that work may disturb it, the Asbestos Manager must be consulted before such work may proceed.

All contractors engaged by the College whose work involves repair, alteration, addition, or replacement of existing fabric and or existing services, or the installation of new plant, equipment, buildings or services, must have the prior input and written authorisation of the Asbestos Manager before any work may commence on site. This requirement will form an integral part of a contract entered into between the College and any person/company undertaking work on its behalf.

Section 4 – Updating the Register and Monitoring of ACMs

The Asbestos Manager is responsible for taking such measures as are necessary to ensure that the Asbestos Register is kept up to date and for identifying the need for, and initiating, further surveys. The post holder will be responsible for taking such measures as are necessary to ensure that it is updated to reflect the removal, remedial action taken and any newly located ACM's.

The Asbestos Manager will implement a regular programme of inspections and risk assessments (see also HSG 264 Asbestos: The Survey Guide (February 2010)), from which will be developed the College's Asbestos Management Plan, which identifies how known asbestos is to be managed. Such inspections will also be logged on the asbestos database to include, for ACM's, their precise location, photograph(s) and a plan. This work will be on-going, having commenced in 2000.

Prior to any work being undertaken which may expose employees or other persons to asbestos, the asbestos register will be consulted and a suitable and sufficient assessment of the risks made and their findings implemented. Such action will be with knowledge and under the management of the Asbestos Manager or their delegated representative.

Section 5 – The Asbestos Management Plan

The Asbestos Manager will produce a schedule of inspections of ACMs from which will be developed the Asbestos Management Plan. The Plan will identify a risk assessed priority for the removal and treatment (including encapsulation) of ACMs. It will also cover occasions in which action is required to deal with situations which arise from routine maintenance requirements not previously identified as being a requirement. In all cases, the requirements of the Control of Asbestos at Work Regulations shall be met. Being based on the risk assessment principle, the Plan will also form the basis for the College's annual, planned expenditure on asbestos.

Section 6 – Information, Instruction and Training

Staff will be trained annually to the standards identified to be necessary by the Asbestos Manager based on a risk assessment of their duties and the legislative requirements. It will also be to the standards identified in the Estate Services Department, Asbestos Code of Practice and Guidance document.

The College's "Guide to Asbestos in the Workplace" will be used as an integral part of such training.

New Members of Estate Services staff

Each new member of staff will be required to be trained in the use of the asbestos register and the asbestos management policy as part of their induction training held on their first day of employment. The Asbestos Manager will provide 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.

Section 7 – Asbestos Management Review Group

Under the direction of the Deputy Director of Facilities Management, the Estate Services Department will hold at least one meeting per year to review and monitor this Asbestos Management Policy, the Asbestos Management Plan and other relevant documents/issues.

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.

The overall purpose of the Group will be to review, on behalf of the College, that the Estate Services Department has/is taking all appropriate measures to meet the requirements of the Asbestos at Work Regulations and other relevant legislation, either in terms of its absolute duties or those which are “reasonably practicable”.

Section 8 – Annual Asbestos Management Audit

The Health & Safety Adviser will undertake an annual review of the Asbestos Management Policy, Asbestos Management Plan and other associated issues, including compliance with the Asbestos at Work Regulations. Copies of the Audit Report will be passed to the:

Director of Facilities Management
Maintenance and Services Manager (FM)
Registrar and Director of Operations
The Health and Safety Executive Group
The Health and Safety Committee

Dr Richard Fisk
Health & Safety Adviser
Version 2
20/07/11

Signed by the Principal, Professor Paul Layzell on 29th July 2011.

In accordance with the College's commitment to equality and diversity, this Policy has been written and screened to avoid discrimination and promote a positive approach to race, disability and gender issues. Comments on the content of this document should be directed to the College Health & Safety Adviser.