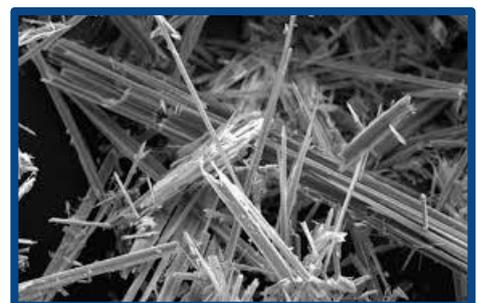


Department of Estates

Asbestos Management Plan

For the management of asbestos containing material in
University premises

May 2019
Revision 4



Name of Policy:	Asbestos Management Plan
Purpose of Policy:	For the management of asbestos containing material in University premises
Policy Applies to:	All University staff, students, visitors, contractors and members of the public.
Responsible for its Updating:	Asbestos and Compliance Manager
Final Approval by:	Director of Estates
Date Initiated:	August 2016
Date of Approval:	
Proposed Date of Review:	May/ 2020

The enclosed guidelines must be complied with when working at, studying at or visiting the University of Bath.

You are advised to keep this document readily available for future reference.

Adherence to these guidelines will be monitored by University personnel, and any breaches will be treated seriously.

Revision History

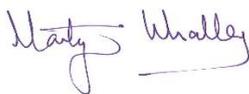
Doc Rev	Date	Description of amendments	Revision author
	Aug-2016	Final document approved and issued	
1	Jan-2018	Amendment to damaged/discovered materials that could contain asbestos	Asbestos & Compliance Manager
2	Apr-2018	Change of title from Asbestos Operational Procedure to Asbestos Management Plan	Deputy Director of Safety & Wellbeing Asbestos & Compliance Manager
3	Jul-2018	Include David Hoare, M&E Compliance Manager, on list of University of Bath staff who hold BOHS P405 Management of Asbestos in Buildings:	Asbestos & Compliance Manager
4	Apr-2019	Complete review of document. Amendments to reflect transitional arrangements associated with moving to the new CAFM system. This includes amended plans to resurvey buildings to refresh asbestos log data.	Asbestos & Compliance Manager

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This Document sets out the University of Bath Asbestos Management Plan for managing and dealing with Asbestos Containing Materials (ACMs) in all of its buildings.

This document was approved on _____



Signed: _____

Martyn Whalley
Director of Estates

1.0 Introduction

University of Bath recognises its responsibilities and duties under the Health and Safety at Work, etc., Act 1974, to provide as healthy and safe an environment as is reasonably practicable for all staff, students, contractors, visitors and members of the public who visit the University campus.

Under the Control of Asbestos Regulations (CAR) 2012 the University of Bath, including the Department of Estates in particular, recognises and accepts its duty to manage asbestos.

The purpose of this document is to outline the management regime for the control of asbestos containing materials (ACMs) and will be reviewed periodically as required by changes in the legislation, the Approved Code of Practice (ACoP) and HSE guidance.

Some buildings owned or occupied by the University of Bath were built or refurbished at a time when the use of asbestos containing materials (ACMs) in their construction was common. This extensive use means that there are still many buildings which contain asbestos.

The presence of ACMs 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. An isolated accidental exposure to asbestos fibres for a short duration is extremely unlikely to result in the development of asbestos related diseases.

Workers who disturb the fabric of buildings during maintenance, refurbishment, repair, installation and related activities may be exposed to asbestos every time they unknowingly work on ACMs or carry out work without taking the correct precautions. The purpose of managing asbestos in buildings is to primarily protect individuals or, where this is not reasonably practicable, minimise exposure for these groups of workers and other people in the premises.

In order to manage ACMs effectively, information is needed on whether asbestos is, or is likely to be, present in the buildings, so that an assessment can be made about the risk it presents and appropriate measures put in place to manage those risks.

The management of asbestos materials is controlled by various legislation, most notably the Control of Asbestos Regulations (CAR) 2012.

Responsibility for the management of ACMs lies with the Department of Estates to whom the University has delegated the duty to manage under Reg 4 of (CAR) 2012, but all staff, students, other visitors and users have an obligation to assist in complying with that duty under Health and Safety at Work, etc. Act 1974.

2.0 Scope of Work

This Asbestos Management Plan applies, **without exception**, to all properties owned and maintained by the University of Bath. It also applies to any property where the University of Bath has maintenance responsibility, whether owned, rented, leased, etc., unless specifically excluded in the relevant contractual documents.

The University of Bath has given the Department of Estates sole responsibility for the management of the building stock portfolio and no other department or section may commission works upon the building fabric and services unless prior approval has been given in writing by the Director of Estates or his / her nominee.

This document exists to outline the operational procedures for the management of asbestos during normal use and maintenance activity of the University's buildings. This document provides guidance for the Department of Estates management and trades staff to carry out their duties safely and in accordance with the University Asbestos Management Policy.

The Department of Estates will, so far as reasonably practicable, prevent the exposure of staff, students, contractors and any other visitors to University's buildings, to airborne asbestos fibres. To achieve this The Department of Estates undertakes to:

- Comply with University health and safety policy and all relevant legislation including, but not limited to, the Control of Asbestos Regulations (CAR) 2012 and any associated Approved Codes of Practice (ACoP) or Guidance.
- Provide University of Bath Department of Estates staff with the relevant level of asbestos awareness training that they require to safely discharging their duties. Support University of Bath departments with asbestos awareness training needs as required.
- Maintain an asbestos register with up to date risk assessments for all buildings constructed prior to January 2000 that is accessible to all persons using University Buildings. New acquisitions will be assessed upon completion.
- Ensure all contractors and subcontractors have attained a satisfactory and relevant level of asbestos awareness training, before attending site.
- Undertake Refurbishment & Demolition Surveys prior to any work upon the building fabric, no matter what the scale.
- ACMs identified in a hazardous condition or posing a potential hazard to planned works will immediately be risk assessed, made safe and the necessary management action applied.
- Ensure that removal of ACMs will only be performed by University approved HSE licensed asbestos removal contractors (LARC).
- Restrict access of University personnel and other users to Asbestos Areas (i.e. those areas where Respiratory Protection or other control measures are in place), unless suitably trained and protected, and according to the documented method. They will not work directly upon, or otherwise disturb, ACMs unless authorised to do so.
- Review this document and attendant procedures quarterly at the Asbestos Management Group meeting; document and implement the findings of these reviews. The management system should also be independently reviewed on a regular basis, usually annually.
- Promote awareness of the hazards of ACMs and the University's asbestos policy, management and operational procedures through training of Department of Estates' staff.

3.0 Roles & Responsibilities

Roles and responsibilities for the management of asbestos are described in the University's Asbestos Management policy. This section details how these responsibilities are discharged on an operational basis.

Department of Estates staff with line management responsibilities will ensure that all staff are familiar with the contents of the University's Asbestos Policy and Asbestos Management Plan insofar as it is relevant to their roles and responsibilities.

Responsibility for the implementation of this operational document, along with the operational management of ACMs in premises, will rest with the Director of Estates, who has delegated the daily operational duties of asbestos management to the Asbestos Manager.

In the event of the Asbestos Manager being unavailable guidance is to be sought from the Director of Estates Operations.

Necessary training and assistance will be provided by the Asbestos Manager as requested.

3.1 All University Employees, Contractors and Other Users

All University Employees, Contractors and Other Users (including students) are to comply with the requirements of the University Construction Safety Policy, University Asbestos Management Policy and the contents of this plan.

3.2 Construction (Design & Management) Regulations (CDM 2015)

Most of the changes in the new CDM 2015 regulations (supersedes CDM 2007) directly affect the way asbestos is treated in construction projects.

CDM 2015 makes the University of Bath accountable for any significant impact that decisions and resource allocation have on the health, safety and welfare standards achieved on CDM projects. As CAR2012 requires duty holders to effectively manage asbestos in buildings, the University holds information about the location and condition of ACMs in the asbestos register, which can be accessed by liaison with Asbestos Manager.

Department of Estates staff that are authorised to commission projects works on the buildings and grounds of the University of Bath will adhere to the requirements of CDM 2015, CAR 2012 and should refer to this Asbestos Management Plan and any relevant asbestos surveys.

3.3 Licensed Asbestos Removal Contractors (LARCS) & OTHER SUB CONTRACTORS

LARCS involved in works on the University of Bath buildings shall:

- Maintain a current license from the HSE to work with asbestos.
- Have in place current and adequate insurance cover for the asbestos works to be undertaken.
- Ensure working practices are in compliance with current legislation and all associated Approved Codes of Practice (ACoP) and Guidance.
- Attend site to assess and prepare quotations against asbestos work specifications.
- Raise any issues relating to health and safety, or potential additional costs, to the project manager at the earliest opportunity.
- Provide a written Plan of Work and risk assessments to the relevant parties prior to works commencing. Those parties are:

➤ In the case of non-notifiable CDM works the project manager and the Asbestos Manager.

- In the case of notifiable CDM works the principal contractor, principle designer and the project manager.
- The Plan of Work and risk assessments must indicate the resources and timetable allocated to the project in accordance with CAR 2012.
- Agree Emergency procedures with the relevant parties.
- Provide statutory notice to the Health and Safety Executive (HSE) as may be required prior to the commencement of any asbestos related works or, by agreement with the Asbestos Manager, applying for a waiver against the minimum notice period. Copies of all such notices must be submitted to the project manager before work commences.
- Carry out their obligations under the contract, including maintaining high standards of safety and hygiene in asbestos works, and all related work areas, and supplying labour, materials and equipment of the highest standard, complete with all supporting documentation as may be required.
- Arrange transport and disposal of asbestos waste materials in accordance with legislative requirements and provide copies of all consignment notes, carrier's registration(s) and waste management licence(s), test and reoccupation certificates via consultant analyst to the project manager and Asbestos Manager.
- Carry out regular inspections of the work environment. Any defects found, or any reported by the project manager or Asbestos Manager must be rectified immediately.
- Comply with the Department of Estates' Code of Safe Working Practices for Contractors'.
- Inform the project manager and Asbestos Manager of any additional elements of work which are to be agreed. The Plan of Work and Risk Assessment must be updated accordingly.
- Liaise with the appointed UKAS accredited asbestos consultant to ensure the satisfactory progress of the works.

3.4 Asbestos consultants (analysts & surveyors)

Asbestos Consultants involved in works on the University of Bath buildings will be expected to:

- Maintain and demonstrate UKAS accreditation relevant to the requested task.
- Provide documentary evidence of the competence (qualifications, training and experience) of the individual surveyors and analysts carrying out work to the Asbestos Manager on request.
- Maintain adequate insurance cover for the tasks to be undertaken.
- Provide support to Asbestos Manager and the Department of Estates as may be required.
- Review and comment, when requested, specifications, contractor's Plans of Work and risk assessments, work procedures, etc.
- Carry out analytical works and inspections as agreed with the Asbestos Manager as well as additional work that may be requested.
- Report to the project manager or Asbestos Manager any defect or non-compliance relating to the contractor's performance, including suitability of the work area, adherence to the Plan of Work etc. Where the project manager or Asbestos Manager is not immediately available the surveyor or analyst will be expected to take such measures as may be deemed necessary to ensure the health and safety of contractors and subcontractors and building occupants.

- Inspect areas on completion of asbestos remedial works to ensure that the contractor has completed his scope of works and all affected areas have been left in a satisfactory condition.
- Carry out air monitoring tests as may be required.
- Report to the Asbestos Manager any aspects of asbestos management encountered on site which could give rise to health risks, e.g. breaches of the Asbestos Policy and Procedures, suspect or damaged asbestos.
- Issue formal reports, including Certificates of Re-occupation, to the project manager or Asbestos Manager on completion of any site works.
- Availability 24hours per day / 7 days per week
- For emergency incidents: Arrive on site within 2.5 hours during normal working hours (0800-1900) and within 4.5 hours outside normal working day.

4.0 Operational Procedures

4.1 Implementation

This Management Plan document will be formally adopted by the Department of Estates and all other employees, students, contractors and visitors to the University of Bath Estate. It will form the basis for all asbestos management activities under the control of the Department of Estates.

This document is held within the Department of Estates or can be viewed as a PDF via the University website.

Estates staff with asbestos responsibility will receive relevant training with regard to these procedures.

4.2 Management of Asbestos Containing Materials (ACMs)

The Department of Estates will manage the asbestos within its estate through a combination of the following three approaches. The approach in each given scenario is dependent upon the risk assessment of the material, followed by a cost-benefit analysis. The approach regime is:

4.2.1 In-situ Management

The preferred option is always to leave ACMs in-situ provided it can be managed where such material can be managed in such a way as to not pose a hazard to health. Asbestos that is in good condition with a low risk of accidental damage is perfectly safe, and may be left in place for many years. Identified ACMs will be risk assessed using the methodology described on the Health and Safety Executive's website ([Priority and Material Assessments](#)). This information is recorded in the asbestos register and its condition monitored under re-inspection regime.

4.2.2 Remediation and Management

Asbestos that is currently in a poor condition need not necessarily be removed. If the assessment identifies an ACM as posing an elevated risk, it may be that remedial work such as encapsulation can reduce the risk to an acceptable level, so that the material can be left in-situ and managed as above. ACMs requiring remediation should be assessed on a case-by-case basis, and the difficulty and costs involved should be balanced against any achievable reduction in risk. It should be noted that certain ACMs require such stringent control measures during encapsulation that removal may prove to be a better option in the longer term.

4.2.3 Removal

This should always be considered a last option, but sometimes it can be the only way of safely dealing with an asbestos material. The University will only allow licensed asbestos removal contractors (LARCs) to perform removal operations on its buildings, irrespective of whether their use is mandatory in a particular case or not. As noted above, removal is not an easy option, and frequently it can prove impossible to remove all ACMs from a given area, as they may have been installed mid-construction for example. Asbestos removal works should be planned in detail, and all parties should be aware of what is required, the desired outcome and how to most safely achieve it. Furthermore, a risk assessment will be carried out after the ACMs removal for further encapsulation or four stage clearance or reassurance certificate will also be produced to ensure full compliance.

4.2.4 Asbestos Register

The asbestos register will not be generally accessible to other members of staff, students or visitors, etc., although information will be made available to those who request it, in a suitably interpreted form. Where information is requested, the Asbestos Manager will provide this information and will also provide any advice and guidance on the contents of the risk assessments. This will ensure that people requesting the information are provided with appropriate advice to understand the type of asbestos material identified, its risk rating and potential hazards. Users can also seek advice from the University's Health, Safety and Environment Service where they require further reassurance.

The Asbestos Manager is accountable for the maintenance of the asbestos register and will be responsible for ensuring that the information held is kept up to date at all times and particularly when:

- Previously unrecorded asbestos materials are found; or
- Asbestos abatement remediation is performed; or
- A regular re-inspection is carried out; or
- The condition of an ACM changes for whatever reason.

Contractors working on building fabric or services will be provided with suitable asbestos information relevant to the area that is being worked on. This will be provided by the Asbestos Manager as part of the contractor's induction. In the absence of the Asbestos Manager, advice should be sought from the Director of Estates Operations.

Project managers overseeing minor works and maintenance activities are responsible for ensuring that suitable and sufficient asbestos information is provided to their contractors. This should be provided at tender stage, so far as is reasonably practicable, but in any case before any works are allowed to commence. The Asbestos Manager will discuss the scope of works with the project manager and/or contractor and will check existing information to see whether or not further survey work is required.

Where no survey information is available then it will be presumed that asbestos containing materials are present. The Asbestos Manager will engage one of the University's asbestos consultancy framework contractors to carry out an appropriate Refurbishment and Development Survey to ensure that suitable and sufficient asbestos information is available. The Asbestos Manager will be responsible for ensuring that this information is provided to the Project Manager. In the event that the Asbestos Manager is unavailable, project managers will liaise with the Director of Estates Operations who will then be responsible for arranging for one of the framework asbestos consultants to carry out the tasks delegated to the Asbestos Manager.

Arrangements for routine maintenance works carried out by Estates personnel are covered in Section 6 of this plan.

Arrangements for major projects, building refurbishments and similar projects are covered in Section 7 of this plan.

4.2.5 Computer-Aided Facilities Management System (CAFM)

The University is in the process of transitioning property related data, including Asbestos Management logs and records to a new version of Archibus. In the interim, all data will be held on the Estates Main Drive. Whilst this is visible to all Estates personnel, access will be via the Asbestos Manager.

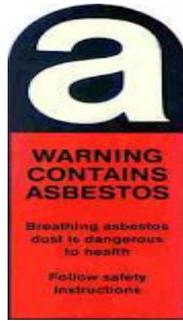
In preparation for the implementation new system, the University will be commissioning a condition survey of each of its properties. This process will include new asbestos management surveys of all buildings built prior to 2000. The surveys will take account of historic data, including data from previous Refurbishment and Development Surveys undertaken to facilitate projects in existing buildings. Previous asbestos logs will be archived once the new surveys have been uploaded.

Thereafter, all historical information will be retained so that we have an ongoing record of management actions. Information on materials that have been removed should be retained, albeit clearly identified as removed. All documentation relating to asbestos materials, including removal, should be scanned and electronically archived within the University of Bath CAFM System for a period of at least 40 years after the demolition of a property.

4.2.6 Labelling of ACMs

Generally, the University of Bath will not label ACMs in plain view because this can cause undue alarm to building occupants or incite vandalism. An exception could be ceiling voids and service ducts, etc but this is to be considered on a case by case basis.

The labelling of ACMs is always 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. Use of the standard warning label on an obviously non-asbestos material has, in the past, caused it to be completely ignored with damage to the asbestos material behind.



Standard Estates Labels

Labelled materials will require inspection on a regular basis as per their risk assessment and, where practicable.

4.3 Surveying & Bulk Sampling for Asbestos

All surveying, sampling and analysis works will be undertaken by asbestos consultants from the University's asbestos consultancy framework. Each of these consultants have UKAS accredited laboratories. All surveyors hold appropriate training certificates appropriate to the work that they will be undertaking. Their presence on the approved list will be an indicator that their accreditation is up to date, and that their insurance cover is adequate. The level of accreditation required will be:

- Sampling: The organisation will hold UKAS accreditation for sampling of asbestos in bulk materials according to ISO17025:2005.
- Analysis: The organisation will hold UKAS accreditation for analysis of asbestos in bulk materials according to ISO17025:2005.
- Surveying: The organisation will hold UKAS accreditation for surveying of asbestos in premises according to ISO17020:2012.

The University will update the list of approved laboratories on an annual basis, or in the event of a change in status. Accreditation will be checked against the UKAS website, and will not rely on evidence submitted by the organisation.

New survey reports will be audited upon receipt.

4.3.1 Building Assessment

New acquisitions to the Estate will be assessed as follows:

The initial assessment will consider the date of construction, date of any major refurbishment, floor area and known asbestos in order to arrange buildings by survey priority.

A survey programme can then be developed which will investigate the higher risk properties first.

Generally those constructed between 1945 and 1999 will be considered most likely to contain asbestos, but it should be noted that pre 1945 properties may well have had substantial amounts of asbestos installed during any refurbishment.

Those properties constructed wholly after 2000 will not require survey or full assessment.

4.3.2 Survey Types

Management Surveys: The most common survey type usually involves the sampling of suspect materials. These can usually be performed in occupied buildings, and should locate most asbestos materials that may be encountered during normal occupation and routine maintenance. However, all such surveys will be risk assessed prior to being carried out to ensure that surveyors and occupants are not exposed to the risk of exposure to asbestos fibres. In the event that management surveys require access to areas that have been presumed to contain asbestos, such as ceiling voids, then the risk assessment will take due account of the risk of release of fibres and a survey under controlled conditions will be required. These surveys are NOT suitable prior to major works.

Refurbishment & Demolition Surveys: Often referred to as fully invasive or destructive surveys, these are highly focused inspections designed to find all possible asbestos materials within an area or property. They are most suitable prior to major refurbishment or demolition, and cannot be performed while an area is occupied. If a survey is carried out in an area that will subsequently be reoccupied prior to any maintenance or refurbishment works being carried out then the building must be made safe before reoccupation is permitted.

Refurbishment & Demolition surveys require very precise planning, and it should be ensured that the prospective surveyor is well aware of the planned building works, their extent and what is expected from the survey.

4.3.3 Material Identification

All suspected asbestos materials shall be identified by analysis performed by an approved laboratory unless they can be positively identified as non-asbestos, e.g. timber or plasterboard or yellow fibreglass. Soft insulation boards and other insulations should always be considered suspect until a positive analysis result can be obtained. If, for whatever reason, they cannot be analysed, then they shall be assumed to contain Amphibole asbestos in the case of insulation and insulation boards, or Chrysotile in the case of vinyl floor covering or thermoplastic floor tiles and cement materials.

Visually similar materials may be assumed to be of the same content as sampled materials within a building, where strong evidence of their homogeneity exists. In all instances bulk sampling for asbestos must be representative and in the case of textured coating, the sampling frequency should be higher given its non-homogenous nature.

Care must be taken with painted insulation boards and enclosed runs of pipe insulation that there is not a mixture of materials. If a material is to be worked upon or removed, and any doubt exists, it must have a negative sample analysis result, or be presumed to contain asbestos and treated accordingly.

4.3.4 Building Plans

CAD plans are available for all buildings, and all staff within estates who are involved with changes to buildings must advise the planning and records section of any changes to these plans.

Updates to the asbestos register, must be made whenever there is an action taken regarding any asbestos anywhere on the Estate, and it will be the responsibility of the Asbestos Manager to ensure that this is performed.

The Asbestos Manager, asbestos consultants and Building Information Manager shall meet on a regular basis to review and agree the necessary changes.

4.4 Re-Inspection & Re-Assessment

4.4.1 Material Assessment

This information is usually supplied by the UKAS accredited surveyor, as it is determined by the actual materials physical condition. However, this score can also be assigned by a suitably trained member of University staff.

4.4.2 Priority Assessment

This score can only be assigned by the University as it depends on some knowledge of the occupation of the site. Generally the Asbestos Manager will complete this information, with contribution from other Estates team members as necessary.

See overleaf for Generic Priority Assessments to be used for ACMs across the University of Bath Estate:

4.4.3 University of Bath – Generic Priority Scores

* Based on 'worst case' scenario of AIB shadow batten or artex ceilings ** Based on daily plant checks, filter changes etc.

Room Type	Normal occupant activity	Likelihood of disturbance				Human Exposure Potential				Maintenance Activity			Total
	Main activity (0-3)	Location (0-3)	Accessibility (0-3)	Extent/Amount (0-3)*	Average	Number of occupant (0-3)	Frequency of use (0-3)	Average time area in use (0-3)	Average	Type of maintenance activity (0-3)	Frequency of maintenance (0-3)	Average	
Plant rooms ** (Comms/ electrical/ main server)	1	2	1	3	2	0	3	1	1	2	3	3	7
Circulation (corridors/ stairwells/ lobbies)	1	2	0	3	2	3	3	3	3	1	1	1	6
Café/restaurant	1	2	0	2	1	3	3	3	3	1	1	1	6
Teaching room	1	2	0	2	1	3	3	2	3	1	1	1	6
PC Lab	1	2	0	2	1	3	3	3	3	1	1	1	6
Laboratory	1	2	0	2	1	3	3	2	3	1	1	1	6
Offices (meeting rooms)	1	2	0	2	1	2	3	3	3	1	1	1	6
Kitchen (industrial)	1	2	0	2	1	2	3	3	3	1	1	1	6
Lecture theatre	1	1	0	2	1	3	3	2	3	1	1	1	6
Event Space	1	1	0	3	1	3	2	3	2	1	3	2	6
Open Learning Space	1	2	0	2	1	3	3	3	3	1	1	1	6
Library	1	1	0	3	1	3	3	3	3	1	1	1	6
Voids	0	3	1	3	2	0	1	0	1	2	2	2	5
Shops	1	2	0	2	1	3	3	3	3	1	1	1	6
Sleeping accommodation	1	2	0	2	1	1	3	3	2	1	1	1	5
Kitchen	1	2	0	2	1	1	3	2	2	1	1	1	5
Post Room	1	2	0	2	1	1	3	3	2	1	1	1	5
Reception	1	2	0	2	1	1	3	3	2	1	1	1	5
Staff Common Room	1	2	0	2	1	3	3	1	2	1	1	1	5
Ducts (vertical penetration)	0	3	1	2	2	0	1	0	1	2	2	2	5
Loading Bays	1	1	1	2	1	1	3	1	2	1	1	1	5
WC	1	2	0	2	1	0	3	1	1	1	1	1	4
Storerooms (archive stores)	1	2	0	2	1	0	3	0	1	1	1	1	4
Cleaners cupboards	1	2	0	1	1	0	3	0	1	1	1	1	4
Roof Space	0	3	0	2	2	0	0	0	0	1	2	2	4
Lift shafts	0	3	0	1	1	0	0	0	0	2	2	2	3
Roof	0	0	0	2	1	0	0	0	0	1	1	1	2

4.4.4 Combine material and priority score

Based upon the overall score (maximum overall score of 24), the following frequencies will apply unless advised by the Asbestos Manager.

4.4.5 Re-Inspections of ACMs

In accordance with Approved Code of Practice (ACOP – CAR2012) any ACM identified or suspected during the inspection process will need to be re-inspected periodically in order to monitor its ongoing condition.

As part of our approach towards the management of asbestos within our buildings we will need to determine how often such re-inspections are undertaken; this will need to be determined with the following in mind:

- **Physical location of the ACM** - is it easy to reach, is it readily accessible or hidden in an area that is remote from the normal operational activities within the space, potential for damage as a result of maintenance activities.
- **Local Environment** – what activities and or numbers of people will be impacted by the re-inspection.
- **Potential for damage** – will the ACM be damaged as a result of water ingress, normal operational activities and or vermin activity for instance.

Unless advised otherwise by the Asbestos Surveyor and agreed by the University of Bath Asbestos Manager the minimum timeframe for re-inspection will be 6 months. This is based upon the criteria outlined above and any additional site based features as applicable to each scenario. Where surveyors recommend removal but this is deemed not reasonably practicable then the Asbestos Manager will consult with the surveyor to identify an alternative course of action that mitigates against the risk of exposure to fibres. This may be through encapsulation, removal of access or some other form of suitable action. The Asbestos Manager will make a note of the action taken.

The University will not generally label ACM's. However, the Asbestos Surveyor may apply any such agreed labelling media (as agreed with the University of Bath Asbestos Manager) to areas that may be subjected to increased activity such as maintenance based activities, for instance, in order to reduce the risk of accidental disturbance/damage. In the event that this requirement cannot be satisfied the Asbestos Surveyor is to seek advice from the University of Bath Asbestos Manager so as to ensure that we do not place other interested parties in harm's way in respect of ACM's.

4.5 Asbestos Abatement & Remediation

As part of contract and / or project planning, a Refurbishment & Demolition survey will be undertaken, and a Scope & Specification for abatement works produced. The abatement need will then be programmed into the refurbishment plan. This will usually be coordinated by the Project manager.

Should the risk assessment banding of an ACM during a Re-inspection increase to the degree that remediation is required, this work will be scoped and performed as soon as possible. This will be organised by the Asbestos Manager.

If an ACM is damaged by building works, accident or vandalism, then all works in the immediate vicinity will cease immediately and an assessment of the situation will be made by the Asbestos Manager, with input from a specialist consultant as necessary.

4.6 Air Monitoring

- Air monitoring must only be performed by a UKAS accredited laboratory holding accreditation to ISO17025:2005 for both asbestos in air sampling and fibre counting.
- Air monitoring will be instigated by the University to meet all legislative requirements (e.g. clearance testing after asbestos removal) but may also be used to ensure the effectiveness of control measures by the following means:
- Leak Tests: Leak tests are performed outside asbestos enclosures in order to prove that the integrity of the enclosure is being maintained, and that no asbestos fibres are escaping.

- Background Tests: Usually performed adjacent to asbestos works that do not require an enclosure, or during controlled works that may disturb asbestos materials.
- Reassurance Tests: Performed in the presence of asbestos materials that are not being actively disturbed. Their purpose is to reassure building occupants that the materials pose no actual hazard.

These tests are generally measured against the Control Limit as defined in (CAR) 2012, but for the purposes of the University they will be used to ensure that no staff, students, visitors or contractors- are exposed to unacceptable levels or airborne respirable fibres.

5.0 Approved Suppliers

5.1 Approval of Asbestos Consultants and Contractors

In order to ensure and maintain quality and consistency of approach, only asbestos consultants and contractors, including Licensed Asbestos Removal Contractors (LARCs) that are on the University' Approved Suppliers schedule are to be used.

All newly appointed suppliers are to be notified to UHS&E Services.

The Term Tender process will also be used to determine suitability.

LARCs: The following details shall be requested of all contractors for retention on file, preferably electronically:

- A copy of their current HSE licence (NB HSE licences are valid for a period of 1, 2 or preferably 3 years).
- A copy of their current insurance certificates, demonstrating the level of the various covers.
- Membership details of trade organisations, e.g. ARCA.
- Details of participation and performance in site audit schemes, e.g. ARCA, Site Audit Accreditation Scheme or Santia Safe Contractor.
- For new additions to the list, references should be provided.
- Information on any Improvement or Prohibition notices issued to the company by HSE.

The HSE Prosecutions database should be searched, and any records identified should be further investigated with the company, or filed as appropriate.

In addition to the above, it is expected that contractors will maintain a high level of performance at all times. In order to monitor this, regular site inspections will be carried out by the Asbestos Manager.

Asbestos Consultants: Evidence of current UKAS accreditation. Accreditation is granted separately for bulk sampling, bulk analysis, air testing, fibre counting and surveying therefore it should be ensured that the consultant holds accreditation for the task for which they are to be employed

- Copy of HSE supervisory licence if applicable.
- A copy of current insurance certificates, demonstrating the level of the various covers.
- For new additions to the list, references should be provided.

The HSE Prosecutions database should be searched, and any records identified should be further investigated with the company, or filed as appropriate.

5.2 Contractor Control

All Estates / University approved contractors who are working in buildings containing, or likely to contain asbestos, will be provided with a contractor Health & Safety Induction which includes a section on asbestos awareness within the University.

<http://www.bath.ac.uk/estates/contractors-consultants>

It will be a requirement that all Estates approved contractors who work for the University will ensure that their staff have received adequate asbestos awareness training supplied by a suitable and sufficient provider. If required the company should confirm this in writing.

Contractor's induction by the University will include:

- General information regarding asbestos, its dangers & health effects, the law and responsibilities.
- General information relating to the University estate including those buildings where asbestos is more widely used and the commonly encountered forms.
- Specific information relating to what asbestos information they should receive prior to commencing works and emphasising that they should ask for it if they don't receive it.
- The procedures to be followed if suspected asbestos materials are encountered during works.
- ALL contractors are to sign in and out at the Department of Estates prior to and on completion of works
- ALL contractors are to view the asbestos register for the area they are working in. A documented record is to be kept in the Department of Estates.

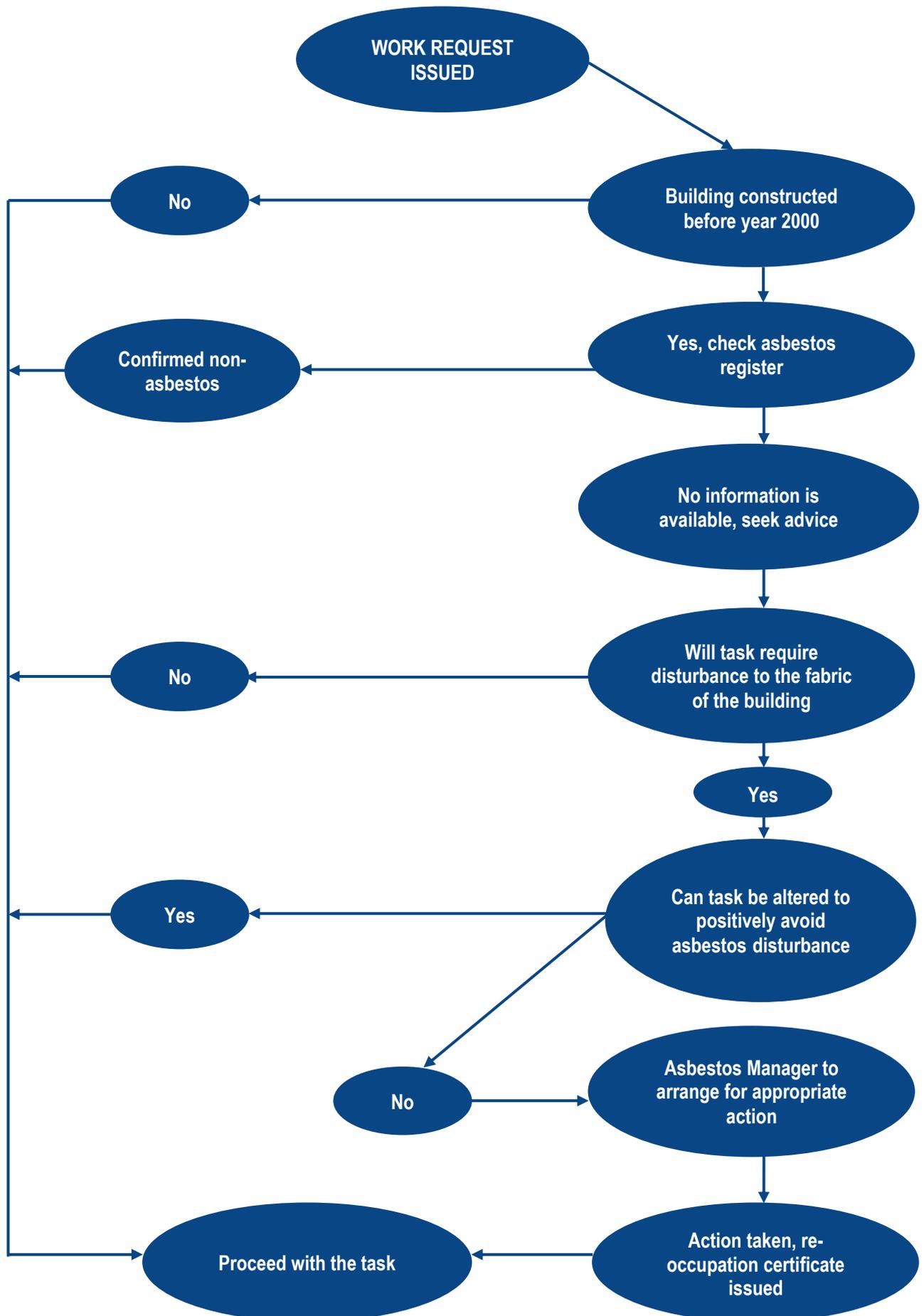
6.0 Routine Estates Maintenance

Estates staff are most likely to encounter asbestos whilst conducting routine maintenance works, including PPMs. This includes activities in ceiling voids, lift shafts, Comms Rooms, Service Risers and Electrical Cupboards. It must be ensured that Estates staff are never inadvertently sent to work upon ACMs in order to rectify a fault or install new services, etc.

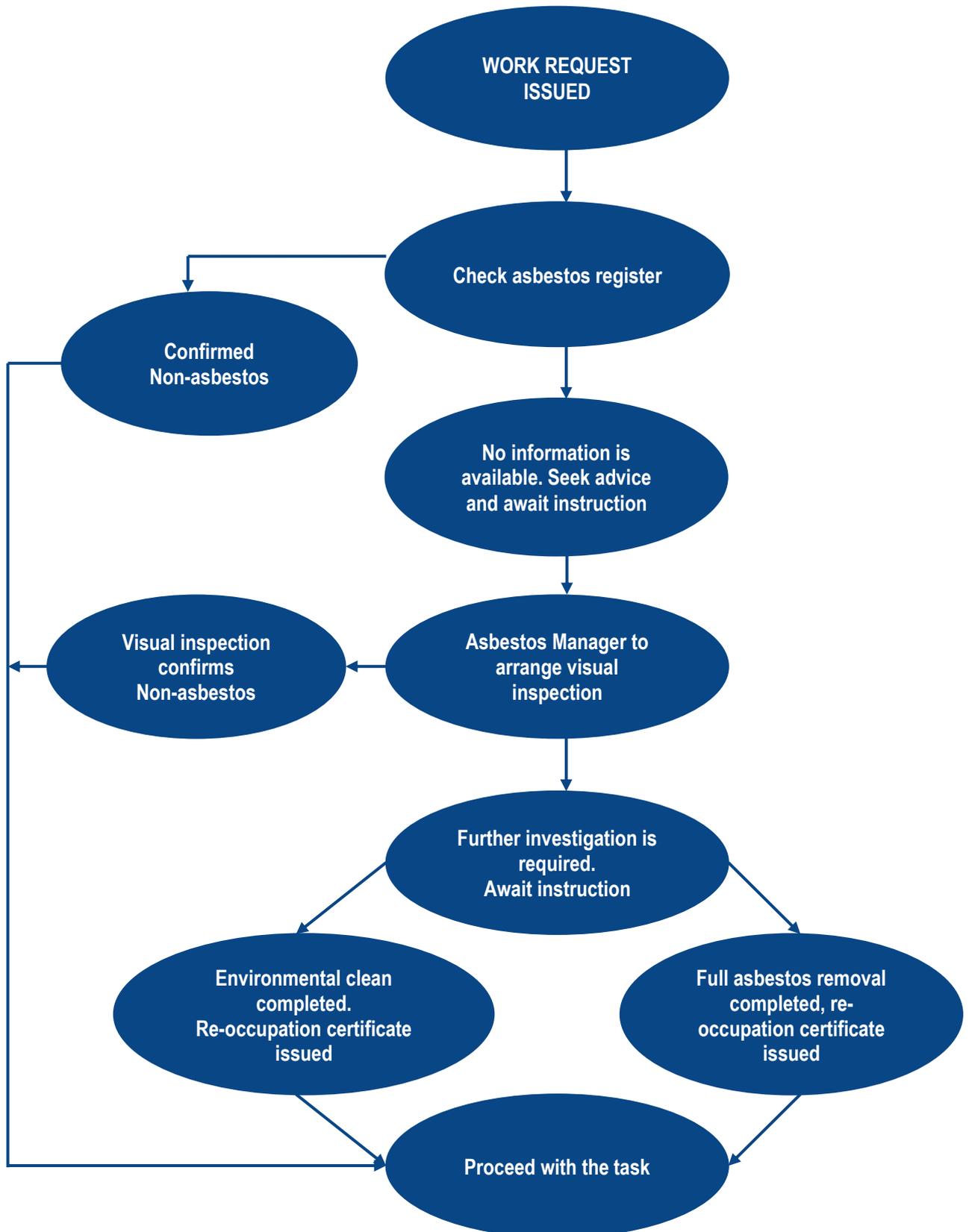
All works should be considered for the presence of ACMs. This can be based upon an interrogation of the asbestos register, via the Asbestos Manager, together with an assessment of the particular building and the location of the planned works. Information to consider in this assessment could include:

- Interrogation of the register relevant to the area of planned works.
- Consideration of the building profile, and known asbestos within the property.
- Consideration of the destructiveness of the planned works and whether investigation is required prior to the works.
- See Flowcharts 1 & 2 overleaf
- One of the objectives of the new upgraded Archibus CAFM system is that Estates staff will be notified of the presence of ACMs automatically as part of the work allocation process. It is planned that this change will happen during the life time of this document revision.

6.1 Management of Asbestos for Maintenance Activities (Flowchart 1)



6.2 Management of Asbestos for access to ceiling voids, lift shafts, Comms Rooms, Service Risers and Electrical Cupboards (Flowchart 2)



7.0 Projects

All projects shall have an initial asbestos assessment performed in the early stages of planning as per the University Asbestos Policy and CDM 2015.

If the project is a new build on a Greenfield site requiring no connection to existing service ducts or plant rooms, etc., then the assessment may be accordingly concise and not involve further investigation.

However, most projects will require some type of formal risk assessment and site investigation which may include:

- Contaminated land survey: most sites will generally require an inspection for various types of contamination, and it should be ensured that a check for asbestos debris from previous demolition is undertaken and any notification of contamination of pollution must be sent to UHS&E Services.

If a project involves alteration, demolition or the attachment of a new build to an existing construction, then a Refurbishment & Demolition survey must be performed prior to works commencing. The only exceptions will be:

- If an assumption is made that an area contains asbestos and that all materials will be removed under controlled conditions.
- If the building or the area is unsafe to enter.
- If it is known that the building was constructed after January 2000.

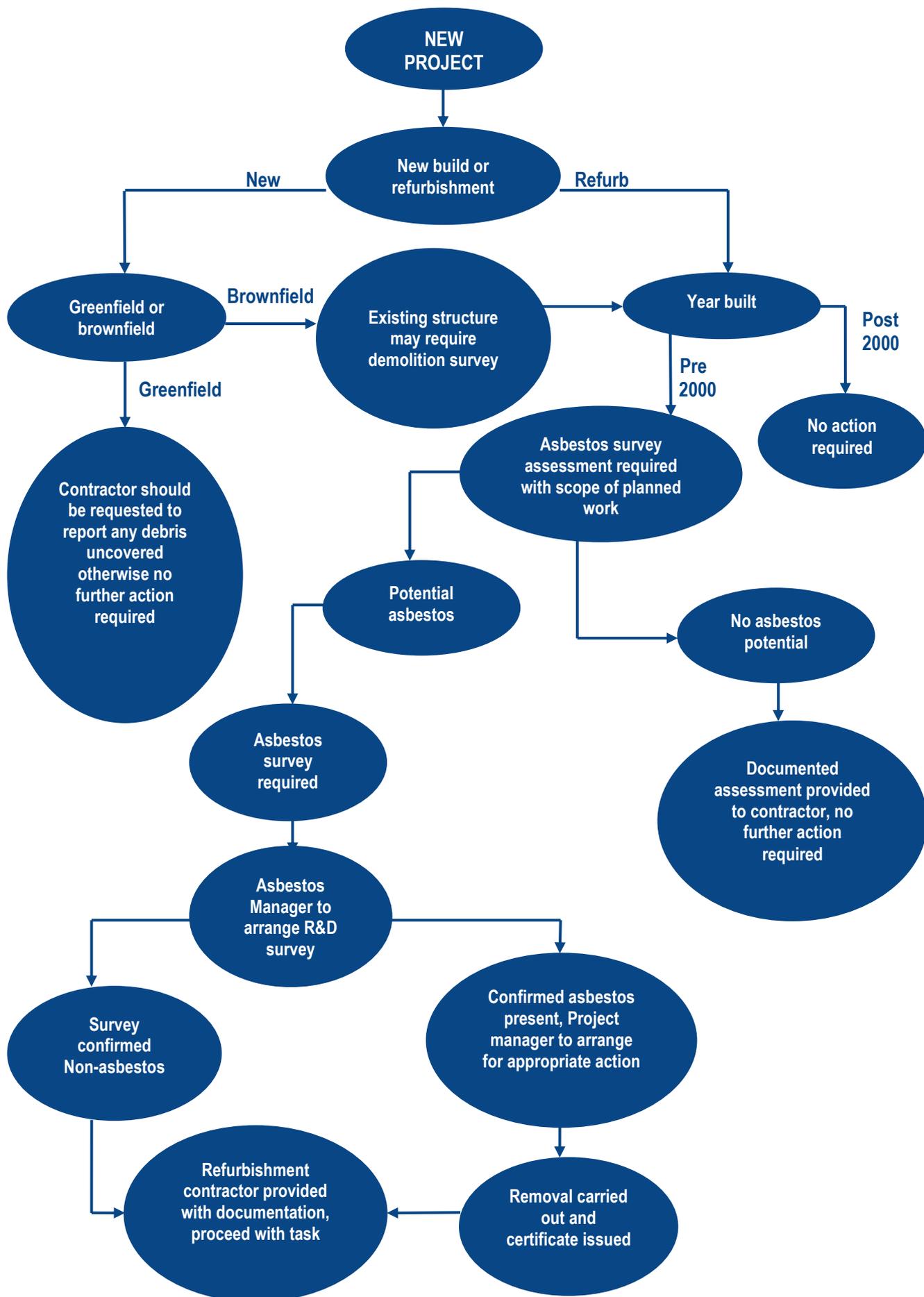
Buildings constructed between 1986 and 1999 may not need a survey, but will require a full assessment performed by either the Asbestos Manager or external consultants.

Buildings unsafe to enter should be assessed for likely asbestos risk based on age, use and construction type. The planned Refurbishment & Demolition works should be carefully carried out with clear instructions to the building contractor to stop immediately should any suspect material be observed, or as soon as it is safe to enter in order to allow an inspection to be carried out.

All assessments, paperwork and decisions relating to projects should be documented and retained within the project file by the Project manager.

Copies to be supplied to the Asbestos Manager who will reciprocate with any documentation supplied direct to them. **See Flowchart 3.**

7.1 Management of Asbestos for Projects (Flowchart 3)



8.0 Training

The University will ensure that all members of staff who will encounter asbestos as part of their daily duties will receive an appropriate level of training.

The key training requirements will be as follows:

Asbestos Manager

BOHS P405, P402 qualifications.

Estates Project and Maintenance Management Staff

Will receive tailored asbestos awareness training relating to a general knowledge of asbestos in buildings and responsibilities under law.

Estates Maintenance Staff and Facilities and Landscape Department

Will receive asbestos awareness training focusing on the ACMs to be found within the University estate, along with reporting and emergency procedures will be provided to this group of staff.

Facilities and Landscape

Further training will be provided to all parties on the availability and contents of this document, together with how they can gain access to the information contained within the register.

BOHS courses will be undertaken with a trainer listed on the BOHS website, whereas the asbestos awareness and other in-house training will usually be provided by the Asbestos Manager. An on-line Asbestos Awareness Training course is also available on the 'Training and Development' site - Human Resources web page.

<http://www.bath.ac.uk/hr/stayingsafewell/training/>

Awareness refresher training is to undertaken annually as far as reasonably practicable.

9.0 Emergency Procedures

In any emergency the primary concern should always be the immediate safety of staff and the building occupants, followed by those who may have to enter the building as a result of the emergency and then those who are nearby. Nothing that is contained within this document shall override any instruction or procedure related to building evacuation.

All staff in the University should be aware of the risk from asbestos. Any member of staff or contractor identifying a possible asbestos hazard must contact the Department Estates Helpdesk 01225 383232 during working hours or Security out of hours 666 or 01225 383999.

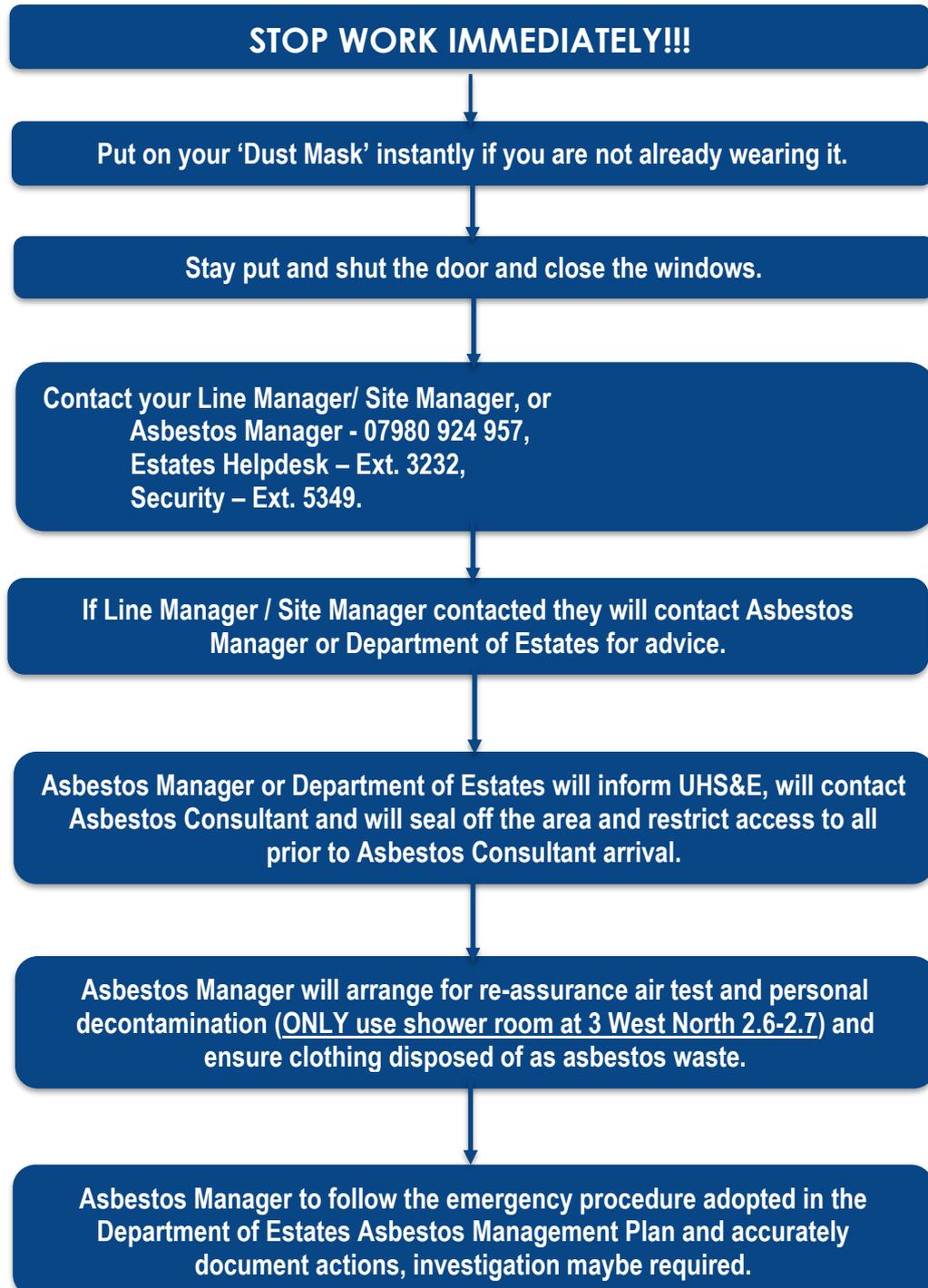
In the event of an accidental and uncontrolled release of asbestos into the work place emergency procedures to limit exposure and risks to health should be implemented. Such procedures should include means to raise the alarm and procedures for evacuation. These procedures should be tested and practised at regular intervals.

- Availability 24hours per day / 7 days per week
- For emergency incidents: Framework consultants to arrive on site within 2.5 hours during normal working hours (0800-1900) and within 4.5 hours outside normal working hours
- Where people have been contaminated with visible dust and debris arrangements should be made to decontaminate the people, their clothing and any personal effect affected.
- The area in which the hazard exists must be vacated and the area closed off.
- The Asbestos Manager shall contact one of the accredited asbestos consultant and give them details of the suspected asbestos hazard.
- The accredited asbestos consultant shall be available 24 hours per day, 7 days per week and able to visit the site within 4 hours, inspect the area, take samples of any suspected asbestos and conduct air tests as appropriate. The samples shall be analysed and a verbal result given to the Department of Estates within the following 24 hours. A written copy of the report with suitable recommendations will be presented to the Department of Estates within 48 hours of the original request.
- If it is confirmed that ACMs have been damaged or disturbed then any persons who may have been exposed to the hazard should be identified and recorded by the Health and Safety Advisor. A note that the exposure has occurred should be added to the employee's personal records. These records should then be kept for a period of least 40 years. The employee should be given a copy of the note with instructions that it should be kept indefinitely.
- A nominated LARC from the approved contractor's list should be contacted and instructed to seal off any contaminated areas that have been identified.
- The asbestos contractor should then produce a suitable method statement and submit it to the HSE if required.
- The asbestos should then be removed under normal asbestos removal procedures.
- The area of contamination cannot be reoccupied until a certificate of reoccupation has been issued by the accredited analyst/surveyor and the enclosure dismantled.
- In the event of a major emergency in a building known to contain significant amount of asbestos Security must be contacted immediately, externally on 01225 383999 and internally on 666 to take appropriate action. **See Flowchart 4 overleaf**

9.1 Asbestos Emergency Procedure (Flowchart 4)

Estates Craft workers and External Contractors

The following steps must take place if you disturb or damage materials that could contain asbestos:



Damaged or discovered materials that could contain asbestos

STOP WORK IMMEDIATELY!!!



9.2 Personal Exposure & Minor Incidents

The Department of Estates Asbestos Management Plan states that no member of staff should work directly upon asbestos materials or in an area where airborne fibre levels are likely to exceed the Control Limit. This to include all ceiling voids throughout the University.

Despite the control measures that are in place, it is possible that a University employee or sub-contractor may inadvertently disturb a previously concealed or unrecorded asbestos material.

As soon as it is realised that the material may contain asbestos it is imperative that the emergency procedure steps are taken (see flowchart 4) and the Asbestos Manager notify the Head of the University Health, Safety and Environment Services under Section 4 of this Operational Procedure.

9.3 Damaged Materials

Any damage to known or suspected asbestos materials should be reported to the Asbestos Manager or Department of Estates as soon as they are observed. No attempt should be made to clear the affected materials. Reasonable steps should be taken to secure the area and appropriate warning notices posted.

Any suspected damage must be reported to the Department of Estates Helpdesk on 01225 383232. A member of the Estates management team would advise on the actions to be taken.

Outside of working hours it should be reported to Security located in the Library or contacted on 01225 385349 who will contact the On-call Duty Manager.

10.0 Asbestos Management Group (AMG)

The Asbestos Management Group (AMG) has been established by the Director of Estates and will oversee the management of asbestos materials within the University estate. It will be composed of core members who should attend the majority of meetings and or be responsible for the development and maintenance of the Asbestos Management System.

The key member of this group is the Asbestos Manager:

Asbestos Manager

- Maintain an effective asbestos management procedure, as detailed in this document, in order that appropriate measures are undertaken for inspection, remediation or removal of asbestos materials as necessary.
- Ensure that this management system is regularly reviewed and amended as required.
- Ensure that the register entry for each property is accurate, and accessible to those who need to access it.
- Arrange surveys and or sampling as required in order compiling this information.
- Investigate any uncontrolled exposure to airborne asbestos fibre as a result of work upon the estate, as directed by UHS&E Services.
- Ensure that the Head of UHS&E Services is kept informed of new projects involving the removal of ACMs or major refurbishment of buildings known to contain ACMs.
- Ensure that the Head of UHS&E Services are informed promptly about any breach of this policy which may constitute a malicious act or which may create a serious health and safety risk.
- Ensuring that adequate re-inspections of known ACMs are carried out on a prescribed basis, and that the asbestos register is updated accordingly.
- Monitor completed asbestos abatement and remedial works, and subsequent updating of the asbestos register.
- Maintain an approved list of consultants and licensed asbestos removal contractors.
- Provide support and advice, as requested by the Head of UHS&E Services, to staff on all matters concerning the management of ACMs.
- Assist UHS&E Services in the development of procedures for the operational management of ACMs and ensure that this information is communicated to both Estates staff and contractors.
- Monitor Department of Estates staff commissioning works to ensure suitable and sufficient Risk & Method Statements are in place prior to commencement of works.
- Monitor the work carried out by Estates staff and contractors to ensure that procedures are effective and are being implemented.
- Contribute to the various meetings held where the management of asbestos is discussed and provide reports at these meetings where necessary.
- Engage and liaise with asbestos duty holders and managers in other Universities and similar organisations, with a view to knowledge sharing and establishing best practice.

Other interested parties may attend on request, but their presence will not usually be expected. The (AMG) members include:

- Director of Estates Operations (chair), Asbestos Manager, University's Head of Health, Safety and Environmental Services. Other members of Estates will be asked to attend where relevant. Representatives of each of the asbestos consultants on the University's framework attend each meeting to provide updates on activities that they have undertaken for the University.

Any of the listed parties may invite further members of their own team, or other interested persons, but it should be noted that the purpose of the Management Group is to discuss general management issues relating to asbestos.

The core agenda is as follows:

- Appointments – discuss any changes or communication related issues.
- Status of Policy & Procedures – approved status, revisions etc.
- Risk Assessments – status, outstanding priority works, and review.
- Risk Reduction – remedial works, incidents.
- Implementation & Management – adoption & performance of procedures.
- Records – status of register, retention of paperwork etc.
- Training – outstanding, advisory and refresher etc.
- AOB

This agenda may be reviewed at any time.

The AMG will meet as required, or in the event of an incident.

The management of asbestos is now a permanent agenda item in the Department of Estates' Health & Safety meetings which are held monthly.

Qualified Persons (*refer to Appendix A – page 31*)

Appendix A

The below mentioned University staff currently holds the BOHS P405 Management of Asbestos in Buildings:

Houshy Rahimi, Department of Estates
Sam Cummins, Department of Estates
Jim Dibben, Department of Estates
David Hoare, Department of Estates
Mark Burton, Health, Safety & Environment
Chris Carey, Engineering & Design Technical Services

In addition, the following University Staff hold the BOHS P402 - Surveying and Sampling Strategies for Asbestos in Buildings:

Houshy Rahimi, Department of Estates