

# **ASBESTOS MANAGEMENT PLAN**

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## **1 OVERVIEW**

## 1.1 INTRODUCTION – ASBESTOS MANAGEMENT PLAN

This Asbestos Management Plan (AMP or Plan) outlines how Bangor University (BU) manages the risks from asbestos containing materials (ACMs) on its estate and should be read in conjunction with the University's Control of Asbestos Policy.

The Plan, which is managed and operated by Campus Services (CS) on behalf of the University, complements the University's Control of Asbestos Policy and is designed to effectively manage and minimise asbestos related health risks to people working and studying at the University, occupying its premises, or affected by the University's activities.

The Plan identifies responsibilities and duties and sets out procedures and protocols for:

- a. Identifying, categorising and risk assessing all ACMs.
- b. The Asbestos Register.
- c. Monitoring and safeguarding ACMs that remain on the estate.
- d. Protecting users of university buildings from potential risks of ACMs.
- e. Controlling maintenance, development and construction work so ACMs are not disturbed.
- f. Managing, reducing or removing ACM hazards.
- g. Training and information.
- h. Emergency arrangements.
- i. ACMs within non-university buildings.

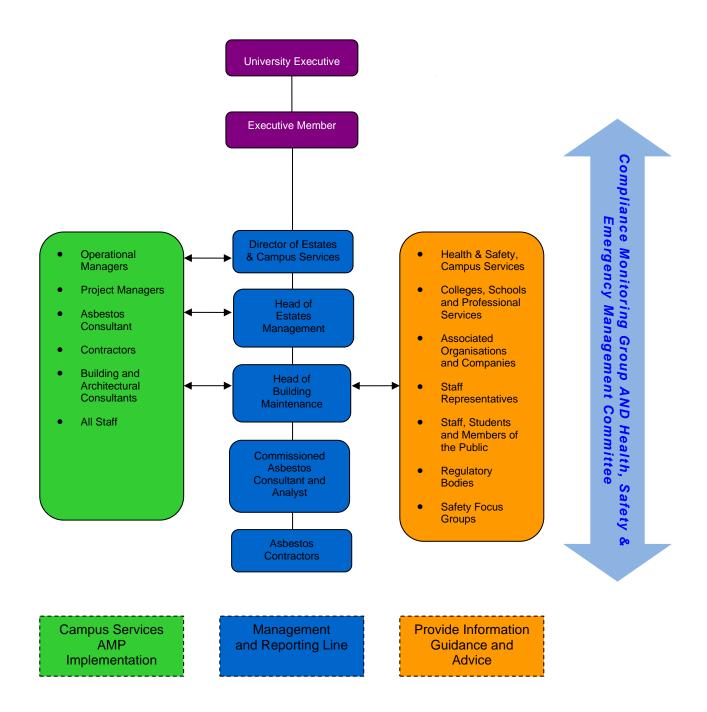
## 1.2 CONTROL OF ASBESTOS POLICY

The University Asbestos Management System applies to all parts of the University's estate without exception. The University's Control of Asbestos Policy (available on the H&S Website), which is prepared and maintained by the University's central Health and Safety department, is to be read in conjunction with this Asbestos Management Plan.

## **2** ORGANISATION

The University is the legal "duty holder" and has prepared the University's Control of Asbestos Policy to meet its legal commitments. In accordance with the Asbestos Policy, Campus Services (CS) has responsibility to manage ACMs pertaining to the University estate. Responsibility includes the production and implementation of a suitable and sufficient Asbestos Management Plan (AMP).

Although the AMP and CS responsibility relates to asbestos on and within buildings, property and building services; it also considers and provides a mechanism to support Colleges / Professional Services with regards to ACMs within 'local' equipment and which remains the responsibility of the applicable College / Professional Service.



## **3** ROLES AND RESPONSIBILITIES OF KEY PERSONNEL

The AMP commits management and staff at all levels to meet legislative requirements and establishes a control measure for the provision of competent advice from external professional and accredited bodies to maintain effective management systems and the prevention of exposure to asbestos. Managers should be suitably and adequately trained and are expected to consider the potential and foreseeable risk of exposure to asbestos and make the necessary arrangements to satisfy themselves as to the safety of the normal and everyday working environment.

### **Director of Estates and Campus Services - DCS**

Having, as far as reasonably practicable, overall responsibility for CS activities the DCS will ensure that processes and systems are in place to suitably manage asbestos materials and associated risks. The DCS shall also appraise the University's Health, Safety and Emergency Management Committee (HSEMC) as required on how asbestos is managed and of the asbestos abatement programme.

Principal functions for asbestos management will be devolved to the HEM for appropriate execution by them, relevant CS staff and the CS appointed Asbestos Consultant.

#### Head of Estates Management - HEM

**NOTE:** In the HEM's absence, direct all queries to the Head of Building Maintenance or Head of Engineering Services.

The HEM has responsibility for day to day management of asbestos and the AMP and ensuring the maintenance of all associated records. The HEM is responsible for ensuring compliance with these procedures and coordinating the role of appointed Asbestos Consultant(s). The HEM will (via the appointed Asbestos Consultant) provide information and advice to university staff, contractors, and consultants engaging in work that may contain ACMs. The HEM will also:

- Ensure a suitably qualified group of staff, consultants and licensed contractors is maintained to deal with any requirements in relation to asbestos issues.
- Ensure that, where applicable, all asbestos related work will be procured by the incumbent Asbestos Consultant.
- Communicate with the appointed Asbestos Consultant(s) to ensure the University's Asbestos Policy and AMP is adhered to.
- Ensure, via the appointed Asbestos Consultants, the CS CAFM software is up to date and includes reference to the asbestos data held in current asbestos surveys/re-inspections.
- Work with Project Managers to identify asbestos issues at a project's feasibility stage and ensure subsequent asbestos issues are discussed and monitored by Project staff.
- Ensure relevant CS staff have statutory Asbestos Awareness Training as defined in the Control of Asbestos Regulations and receive Asbestos Refresher Training as a minimum every 3 years with Asbestos Tool Box Talks provided in the interim.
- Through the Building and Engineering Maintenance Managers, ensure trades staff have suitable and sufficient asbestos training, information, supervision, and subsequent monitoring with respect to asbestos issues.
- Report as required to the DCS and others, on current issues, compliance with the AMP and the performance of Asbestos Consultants.
- Ensure background monitoring undertaken after asbestos removal in occupied buildings.

#### Head of Building Maintenance & Head of Engineering Services

Undertake the following duties as pertinent to their role:

- Ensure asbestos issues and associated costs are considered for projects and included in all subsequent feasibility and contract procurement planning.
- Identify any known asbestos risks in a timely manner before project / work by consulting the Asbestos Register and if required the HEM.
- Request relevant HSG 264 compliant Asbestos Surveys to ensure the appropriate level of asbestos information is available for the project / work.
- Review and reassess the project / work following receipt of Asbestos Surveys and amend Project Plan / requirements as appropriate. This includes commissioning remediation work where project requirements involve working in the vicinity of ACMs and/or on ACMs.
- Ensure staff under their direct control have suitable and sufficient initial and updated training with respect to asbestos issues and the work to be undertaken.
- Provide information to relevant staff, contractors and consultants about all associated University procedures, the location of any known ACMs and the presence or otherwise of items affecting the project / work.
- Ensure project management contractors and consultants involved in their projects disseminate information to others as required.
- Halt work and isolate the working area if suspect ACMs are discovered during the work. Notify the HEM immediately and provide all requested information.
- Provide relevant staff, contractors and consultants with 'as built' plans following a physical change to the layout of a building, ensuring the CAFM software is updated accordingly.
- Keep the HEM informed of all modifications which impact on ACMs and information held.
- Monitor projects / work and formally review arrangements at periodic intervals to ensure the AMP and associated procedures remain effective and are followed as required.
- Ensure background air sampling undertaken after asbestos removal in occupied buildings.

#### Head of Health, Safety and Campus Wellbeing

The Head of Health and Safety shall ensure the University's Control of Asbestos Policy is reviewed as per the Policy Review Schedule and inform the Compliance Monitoring Group of potential changes that will require revision to the AMP In addition, they shall advise on issues of policy and compliance, report incidents falling under RIDDOR legislation to the HSE, and facilitate support to members of staff, students or the public who are known or suspected to have been exposed to asbestos fibres, or who are concerned about asbestos.

#### **University's Appointed Asbestos Consultant**

The University (through CS) will maintain the appointment of an Asbestos Consultant. The scope of services is fully laid out in the terms of appointment and are contained in separate documentation. The Asbestos Consultant will advise the University on all matters of compliance with current statutory legislation and good practice in relation to asbestos and ancillary matters.

### **Campus Services Staff**

Any Campus Services staff undertaking or supervising work which involves going beyond and / or interfering with the fabric of a building must have Asbestos Awareness Training. In addition, staff must ensure they check the Asbestos Register before undertaking any such work. Staff must not proceed if they do not have the required training or are unable to access the Asbestos Register.

#### **Digital Services Staff**

Digital Services staff who undertake or supervise work which involves going beyond and / or interfering with the fabric of a building must have Asbestos Awareness Training. In addition, all such work must be coordinated through the Estates Management Team to ensure all asbestos information for the area to be worked in is provided. Work cannot commence until the Asbestos Register has been checked.

### Contractors

Before commencing any work, the contractor must receive up to date asbestos information (via the Asbestos Register) for all buildings worked in and have 'signed up' to and be aware of the Contractor Working Practices document and associated procedures.

All contractors undertaking activities on the estate must, as a minimum, have 'Asbestos Awareness' Training (refreshed on an annual basis) and receive a CS H&S Induction which summarises the core requirements of the AMP and the Contractor Working Practices document. This includes the requirement to ensure asbestos information is provided to their staff before undertaking any work on the University estate, accessing asbestos information out of hours and emergency procedures if accidental disturbance of asbestos occurs, 'suspect' asbestos is found or personal contamination occurs. Other contractor staff may then require specific training dependent on their role.

When undertaking their work, they must comply with current legislation and the HSE Approved Codes of Practice (ACOP's) in relation to safe working with and around ACMs.

#### **Consultants/Project Managers**

Where the University employs external consultants as Project Managers for capital works, that consultant will be responsible for ensuring appropriate refurbishment survey(s) and asbestos remedial works are identified and planned. This includes completion of the Asbestos Refurbishment Survey Request Form (Appendix 2) with at least 5 working days' notice given. Information must be shared with the Estates Management Team promptly. This includes Asbestos Survey Reports, Clearance Certificates and Hazardous Waste Consignment Notes.

If the asbestos removal works is undertaken in an occupied building, background re-assurance air sampling will be required.

## Head of College / Heads of Professional Services

Head of College / Directors of Professional Services are responsible for ensuring asbestos containing departmental equipment, materials and apparatus are clearly identified, appropriately recorded, and managed in compliance with current legislation. In addition, Heads and Directors must ensure their staff (and students) understand they must not interfere with the fabric of a building, Heads and Directors must also consider if they have specific staff who, due to the nature of their work, require Asbestos Awareness Training. CS can arrange training and inclusion of 'identified' equipment on the University's Asbestos Register.

## **4 INFORMATION & CONSULTATION**

The Asbestos Register is available on request to all (electronically or paper) who may reasonably require such information including building users with details of how to access the register provided during relevant training and Inductions. The CS internal (i.e. staff) and external (i.e. contractors, consultants) meeting structure will enable staff, contractors, consultants etc to communicate and consult on asbestos. Information is also available on the CS Intranet.

## 5 TRAINING

Training plays an important role within the university's Asbestos Risk Management System.

- **Campus Service Staff:** A Training Matrix exists for Estates Management staff with asbestos training requirements detailed on this. As a minimum relevant staff provided with Asbestos Awareness Training with formal refresher training provided by a UKAS accredited asbestos training every 3 years. In the interim, Asbestos Tool Box Talks and similar will be provided.
- Estates Appointed Contractors: Contractors' staff must be trained to a minimum level of "Asbestos Awareness" by an accredited organisation, details of this are contained in the CS "Contractor Working Practices" document which is issued to all contractors.
- **Digital Services Staff:** Digital Services staff who undertake or supervise work which involves going beyond and / or interfering with the fabric of a building must have Asbestos Awareness Training.
- **Staff and Students**: Information that staff and students must not interfere with the fabric of a building and what the Asbestos 'A' Label represents is provided in staff and student H&S Handbooks and in University Induction processes.

## 6 THE ASBESTOS REGISTER

The University's Asbestos Register, is a 'live' register, containing current and historical asbestos information from various surveys and re-inspections. The Register is updated as further information is obtained to ensure details regarding asbestos remain pertinent.

The Asbestos Register records the location and condition of ACMs by campus, building, floor, room or individual space and is contained within the University's Computer Aided Facilities Management software (currently PLANON).

The custodian of the asbestos records is the HEM. Only designated staff authorised by the HEM will be given 'read' access to the Register. 'Editing rights' will be restricted to the HEM, relevant Estates Management staff and the Asbestos Consultant.

## Accessing the Register

CS staff, EM appointed Contractors who manage work on behalf of CS and other University Services who work on the building fabric (e.g. Digital Services staff) must check the Asbestos Register prior to undertaking and / or procuring work likely to disturb the infrastructure, services and facilities. Asbestos Awareness Training has been provided to other key University personnel and contractors to ensure asbestos is considered in specific work activities and that appropriate checks are made of the Asbestos Register.

Access is possible to the Asbestos Register outside normal working hours via PLANON. The HEM (or representative) and Asbestos Consultant are also available to provide advice.

## Up-dating the Register / Database

The Asbestos Register will be updated by the University Asbestos Consultant to record inspection findings and action taken as further investigation, surveys, sampling and remedial works (e.g. removal, encapsulation) are carried out or where physical changes to the layout of a building occur. Updates include reassurance air sampling, Hazardous Waste Consignment Notes.

The HEM or representative will update the Register for ad-hoc asbestos related work e.g. surveys undertaken by a different approved Asbestos Consultant as part of a project.

See Section 8 below regarding 'Pending' statements.

## 7 ASBESTOS SURVEYS / RE-INSPECTIONS

A prioritised programme of remediation works will be compiled from current management information contained in: information contained in the Asbestos Management Survey, information regarding ACM condition arising from the Re-Inspection Programme, forward capital and revenue building and refurbishment programmes and operational knowledge of the building estate.

#### Risk Ratings, Risk Assessment

ACMs identified in the Asbestos Register are objectively assessed by a suitably qualified and experienced person / organisation, appointed by the University using a formal scoring system. The scoring system is defined in HSG264 'The Survey Guide', and HSG 227 'A Comprehensive Guide to Managing Asbestos in Premises'.

ACMs will be prioritised, based upon a risk assessment. This shall consider the potential for fibre release, which is influenced by several factors.

- 1. The type of material e.g., asbestos cement, AIB etc.
- 2. Its condition, location, and use of the specific location/room
- 3. The likelihood of the material being damaged or disturbed and persons exposed to fibres.
- 4. If located in a public area

ACMs with higher assessment scores, or in particularly vulnerable areas, will likely require greater consideration regarding remediation measures.

Significant changes to a room/building will require a re-assessment of the asbestos risk rating and priority assessment by the Asbestos Consultant in consultation with EM staff.

#### **Condition Monitoring**

All ACMs will be re-inspected as determined by the Asbestos Risk Assessment but as a minimum at between twelve and thirty-six monthly intervals.

#### Additional Asbestos Surveys (e.g. Refurbishment / Demolition)

Additional Asbestos Surveys may be required to support planned projects. In most cases of major refurbishment and / or demolition work a Refurbishment or Demolition Asbestos Survey as per HSG264. On completion, Asbestos Survey Reports must be sent promptly to the Head of Estates Management, Head of Building Maintenance and the Head of Engineering Services for information and to (for Surveys the appointed University Asbestos Consultant is not responsible for) upload. A 'Pending Note' must be added to PLANON to highlight an updated report if the findings cannot be uploaded in full immediately (see 8 below):

- Estates Management Appointed Contractors (includes those via the MTC) and Principal Contractors – Shared Sites: Unless otherwise agreed with Estates Management, all Asbestos Surveys must be undertaken by the appointed University Asbestos Consultant, this coordinated with the MTC and / or Estates Management Staff.
- Principal Contractors Corralled Sites: Principal Contractors may only directly arrange Asbestos Surveys for corralled sites. A corralled site is that which is completely independent ie. no connecting services, utilities, equipment or structure with other University premises and / or potential for affecting University activities and its staff and students. Following completion, the Asbestos Survey Report must be sent immediately on receipt to relevant Estates Management staff for record purposes.

## 8 PROCEDURES

The Asbestos Register shows rooms or areas where caution must be exercised and dependent on the work to be undertaken, may not proceed until an assessment has been completed by the external asbestos consultancy.

## Asbestos Register Updates – Pending

Reports from Asbestos Survey must be sent immediately to the Head of Estates Management, Head of Building Maintenance and Head of Engineering Services. If the findings cannot be uploaded immediately (for Surveys the appointed University Asbestos Consultant is not responsible for) a **'Pending Note'** must be placed on PLANON to highlight an 'Updated Survey Report is available' and where this can be found. Once Report findings are uploaded and complete the 'Pending Note' can be removed.

## Labelling Asbestos Materials

Where appropriate, ACMs will be labelled. Labelling will be with industry standard 'A' labels, or the fixing of appropriate warning signs in the medium of Welsh and English. QR coding may also be used where appropriate and will provide access to the consultants database once registered. The QR code will display the ACM content per room location. Checks will be made during re-inspections and damaged / missing labels replaced.

## Asbestos Removal, Encapsulation and Environmental Cleaning Works – Licensable

Works involving the treatment, encapsulation or removal of ACMs shall be procured through the relevant Estates Management staff member.

Asbestos site work will be undertaken by approved HSE licensed contractors who will be engaged on behalf of the University by the Asbestos Consultant. Asbestos contractors will provide a 'Plan of Work' to the Asbestos Consultant detailing how the asbestos shall be removed in compliance with current legislation.

Where asbestos removal is identified as part of major contract work this will usually be managed by the Principal Contractor as set out in the CDM Regulation 2015 as an enabling project. The BU Project Manager will provide the Principal Contractor with relevant information i.e. location of known ACMs, previous surveys and re-inspections, certificates of re-occupation.

## Asbestos Removal, Encapsulation and Environmental Cleaning Works – Non-Licensable

The University's current policy requires any such work to be carried out by HSE licensed asbestos removal contractors following the process detailed above.

#### **Re-occupation/Analytical Management**

Following any removal, encapsulation or environmental cleaning, the Asbestos Consultant will provide independent analytical surveys as defined in HSG248. Re-occupation will not be permitted until relevant certification is received.

### **9 EMERGENCY ARRANGEMENTS**

#### Discovery of and / or Accidental Disturbance of Suspect ACMs

The following procedure should be followed whenever suspected, previously unidentified ACMs are found and / or disturbed:

### 1. STOP WORK IMMEDIATELY.

- 2. In the event of personal contamination see 'Personal Contamination' below.
- 3. Based on the type of material found/disturbed, isolate the area, i.e. shut / lock doors and windows etc. For example:
  - i. Discovery of suspected ACM floor tiles may not require isolation of the work area.
  - ii. However, if AIB (Asbestos Insulating Board) is drilled into, stop work immediately and isolate and secure the area.
- 4. As 3 above. Post warning notices stating do not enter the area include contact details.
- 5. Report this to the Security (01248 38 2795) and relevant BU Project Manager.
- 6. Project Manager to notify the HEM and Asbestos Consultant.
- 7. The HEM & Asbestos Consultant will decide on a procedure based on the potential risk.
- 8. Necessary action will be taken as agreed above.

**NOTE:** In circumstances where a 'site' is under the control of a Principal Contractor and ACMs are discovered the procedures contained in the Construction Phase Plan should be followed and the University Project Manager informed as soon as practical.

#### Personal Contamination

Where accidental personal contamination has occurred, the person(s) concerned **must remain in the area**, isolate the area and contact their Line Manager <u>and</u> University Security (01248 38 2795) who will contact the HEM, Asbestos Consultant AND Head of Health, Safety and Campus Wellbeing.

Each situation will then be subject to a coordinated plan of work prepared in conjunction with the HEM, Asbestos Consultant and Head of Health, Safety & Campus Wellbeing. Records will also be kept as required e.g. Asbestos Exposure.

#### **Incident Recording and Report**

The University's Accident & Incident Reporting Procedure must be followed for all incidents with completed Forms forwarded to central Health and Safety immediately. The Head of Health, Safety & Campus Wellbeing will facilitate any communication with the HSE.

## **10 AUDITING AND MONITORING**

The suitability and operation of the AMP and the university's method of managing asbestos shall be monitored and audited periodically by the Asbestos Consultant, with this requirement included in the scope of the contract tender.

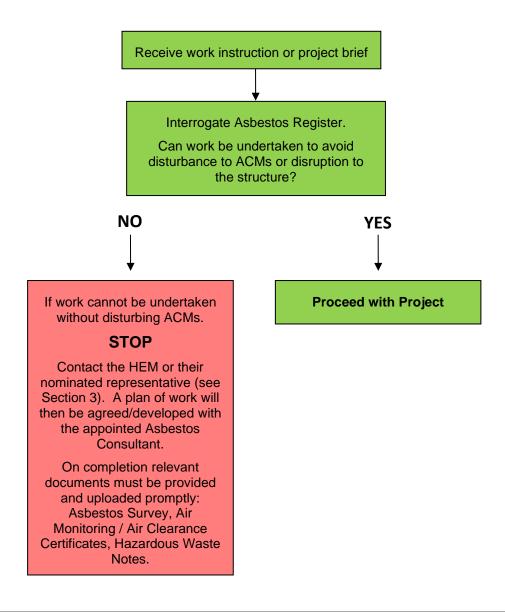
Monitoring will be coordinated by the Compliance Monitoring Group which will be supported by an independent comment from the university's appointed Asbestos Consultant. In addition to this a supporting external overview may be commissioned if deemed appropriate.

In the event of an incident, an interim review will be undertaken by Health and Safety to check the management systems remain effective and its findings reported.

In addition, Estates Management will carry out periodic sample audits to ensure Contractors have implemented asbestos procedures as required. Estates Management shall also provide reports regarding asbestos arrangements and performance to the University's Health, Safety and Emergency Management Committee (HSEMC) as requested.

## **APPENDIX 1 – Asbestos Survey Flowchart**

Process to be followed by Campus Services staff and Estates appointed MTCs.



#### NOTE:

Where the University employs external consultants as Project Managers for capital works, that consultant will be responsible for ensuring appropriate refurbishment survey(s) and asbestos remedial works are identified and planned. This includes completion of the Asbestos Refurbishment Survey Request Form (Appendix 2) with at least 5 working days' notice given.

Information must be shared with the Estates Management Team promptly. This includes Asbestos Survey Reports, Clearance Certificates and Hazardous Waste Consignment Notes. If the asbestos removal works is undertaken in an occupied building, background re-assurance air sampling will be required.



## **APPENDIX 2 – Asbestos Refurbishment Survey Request Form**

External consultants appointed by the University to act as Project Managers for capital works and who wish to undertake an Asbestos Survey as part of their project must complete the Asbestos Refurbishment Survey Request Form. The completed Form must be submitted to the Head of Estates Management or their representative with at least 5 working days' notice given.

From:	Date:	
	Dute:	

Project Title:		
Building:	Building Ref:	
Room No's:		
Project Lead:	Project Ref:	
Cost Code:	Needed By:	

Scope and Extent of Work - attach plans for all spaces

 Note any Specific or Special Instructions or Access Arrangements

 Please provide details how areas will be made good following the Asbestos Survey, fire integrity reinstated etc