# Asbestos Management Plan - Organisation Arrangements

## Reviews and Revisions

| Date | Reason | Reviewer | Next review date | Approved by |
|---|---|---|---|---|
| 14/06/2018 | Full Review. Implementation of individually defined Asbestos Policy & Management Plan. Changes to operating procedures, change in Duty/Deputy Duty Holder appointments & responsibility of policy & procedure. | S Hewes | 14/06/2019 | Emrys Pritchard |
| 02/10/2018 | Section 11.0- Asbestos Management - Inclusion of procedure to complete **Pre Survey Questionnaire**- **Appendix 10**, prior to appointing appointed Asbestos Consultant | S Hewes | 02/10/2018 | Emrys Pritchard |
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# Asbestos Management Plan - Organisation Arrangements

# 1.0 Introduction

This document, the Asbestos Management Plan (AMP) sets out Northumbria University's procedures for managing the potential health risks from Asbestos Containing Materials (ACMs) in all of its premises.

Some buildings owned or occupied by the University were built or refurbished at a time when the use of ACMs in their construction was common. This Plan is designed to effectively manage and minimise asbestos related health risks to staff and other persons working or otherwise occupying University premises.

This document explains how the University complies with statutory requirements and forms part of the University's Asbestos Management Policy

**Guidance:**

The presence of an ACM in itself does not constitute a danger. However, there is a potential risk to health if such material is disturbed and damaged. An isolated accidental exposure to asbestos fibres for a short duration is extremely unlikely to result in the development of asbestos related diseases. However, regular exposure – even at relatively low levels – can present a risk. As well as people employed in the building trades, inadvertent exposure (and consequent risk) can occur in other groups of people e.g. installers of I.T. systems, fire alarms, smoke detectors, etc.

Working with, and managing, ACMs is controlled by legislation, primarily the 'Control of Asbestos Regulations 2012 (CAR 2012). Other relevant legislation includes the 'Health and Safety at Work Act 1974', and the 'Management of Health and Safety at Work Regulations 1999' and 'Construction, Design and Management Regulations 2015'.

## 1.1 Policy Statement

This Asbestos Management Policy supplements the University's Health and Safety Policy which states that: "*The University recognises its duty to provide a safe place of work and a healthy working environment. We understand how these are essential elements of a successful organisation. We believe that excellence in the management of health and safety is a fundamental part of our strategic plan".*

In compliance with this general principle, the University is committed to meet all duties placed upon it by the CAR 2012 and specifically will:

- Protect, so far as reasonably practicable, staff, students, contractors and visitors to University properties from any exposure to asbestos fibres.
- Provide adequate resources in support of this Asbestos Management Plan.
- Identify, as far as is reasonably practicable, all ACMs in University buildings.
- Maintain an Asbestos Register of all ACMs identified and make it freely accessible to those undertaking work on University properties.
- Implement and maintain an effective Asbestos Management Plan (AMP), to ensure that all ACMs are maintained in a safe condition or alternatively are isolated or removed.
- Promote awareness of the risks from ACMs and the University AMP through training and induction of relevant staff and contractors.

- Appoint a competent and suitably qualified person to undertake the role of Appointed Person as identified in HSE guidance HSG264 *'Asbestos: The Survey Guide'* (Ref. 2). This role will carry the title 'Asbestos Duty Holder'.
- Only engage appropriately trained, qualified and competent persons to undertake any work with ACMs (including management, surveying, abatement and removal).
- Provide adequate and timely resources to enable effective implementation of the AMP.
- Annually review the AMP.

### 1.2 Objectives

The key objectives of this plan and its supporting documentation are to establish the departmental processes for all staff involved in work that may affect the fabric of University Buildings and those involved in construction and maintenance activities on behalf of the University. It also details the mechanism by which exposure of staff, students, contractors and others to asbestos will be prevented and identifies the duty holder and competent persons with specific responsibilities for managing asbestos.

This demonstrates a commitment by the University to comply with CAR 2012 by:

- Identifying and effectively managing ACMs on site.
- Controlling all work likely to affect ACMs on site including maintenance and project work.
- Responding to and managing any emergencies involving ACMs on site.
- Implementing robust procedures and effectively executing this management plan.

## 2.0 Asbestos Management Plan

This Plan sets out the mechanism, roles and responsibilities by which ACMs are to be managed. It includes details on how the University intends to:

- Protect staff and others working on the fabric of University properties.
- Protect staff and others working within or occupying University properties.
- Identify all ACMs and manage associated hazards based on assessment of the risk they present and prioritisation of action.
- Effectively control any work likely to affect ACMs.
- Undertake maintenance work.
- Undertake project work.
- Monitor and maintain ACMs in good condition where it is assessed as being safe to leave them in situ.
- Respond to and manage any emergencies involving ACMs.

### 2.1 Legal Framework

Whilst the plan is intended to comply with all aspects of the requirements of CAR 2012 and other relevant legislation, the following duties within CAR 2012 are expressly highlighted as being fundamental to the success of the University's effective Asbestos Management System, and underpin this Plan:

***Regulation 4* – requires 'Duty Holders' to:**

- Find ACMs and check their condition.
- Presume that materials contain asbestos unless there is strong evidence to suppose they do not.
- Keep an up-to-date written record of the location and condition of ACMs.
- Assess the risk of anyone being exposed to these materials.
- Prepare and put into effect a management plan to manage the risk and keep ACMs in a good state of repair, or ensure that it is repaired or if necessary removed.
- Provide information on the location and condition of the material to anyone potentially at risk.

***Regulation 5 – 'Identification of the Presence of Asbestos'* states:**

An employer shall **not** undertake work in demolition, construction, maintenance, or any other work which exposes or is liable to expose their employees to asbestos unless either:-

- A suitable and sufficient assessment has been carried out *(Regulation 6)* as to whether asbestos is liable to be present.
- If there is doubt, assume that asbestos is present.

***Regulation 10* requires employers to:**

- Ensure that adequate and frequent information, instruction and training is given to employees.

# 3.0 Identification of Asbestos Containing Materials

In order to manage the risk from asbestos the University will ensure that a suitable and sufficient assessment is carried out as to whether asbestos is or is not likely to be present in University buildings. This requirement is valid for any property built before 2000.

The use of asbestos in UK buildings has been progressively prohibited until a complete ban of all use in construction in November 1999.

## 3.1 Managing People Who Work on Existing Building Fabric, Services, Plant or Equipment

When a new building is acquired by the University, a Management Survey may need to be carried out by our approved framework Asbestos Environmental Consultant, VEGA. This will be commissioned by the University. The survey report should be in a format, and of a quality, that matches the surveys in our existing Asbestos Register. In respect of leased buildings, negotiations must take place and agreement reached on who will provide, maintain and distribute this information. A Management Survey is in place for all Northumbria University buildings. All buildings undergo re-inspection to ensure this survey remains to date.

## 3.2 Existing ACM Information

When a project or maintenance work is planned, the first step is to establish what information on ACM is held for the areas in which persons will be working. Where work is done by or on behalf of Campus Services;

1 Employees must refer to the information in the Asbestos Register for details of its exact location and extent, product type, material condition and asbestos type. This is contained in written form, with photographs and marked floor plans.

2 From the information in the Asbestos Register, those persons project managing or conducting works must decide if there are ACMs within the area in which the work will be carried out or not, bearing in mind that the scope of the work may move beyond the room or area originally planned. If necessary advice should be sought from a member of the Campus Services Asbestos Working Group.

For residential and non-residential buildings managed under an outsourced contractor, e.g. Sodexo, the contractor is responsible for carrying out steps above in relation to all maintenance activity.

Where work is being carried out by other Faculties and/or Services in the University, for example, I.T Network Teams, they must first establish whether ACMs have been identified in that area.
The first step is to consult the Asbestos Register for the particular building and sign the register to acknowledge an understanding of the information contained in this.

***The registers are located in the following places*** as identified in Section - **4.2 Storage and Availability.**

### 3.3 Work in Area/s where ACMs Have Been Identified

No work can proceed that has the potential possibility of releasing asbestos fibres. If ACM is identified within the work area, persons seeking to conduct work related activities must decide if the work they plan to carry out is likely to disturb the ACM, and what action they need to take to avoid exposing anyone to airborne asbestos fibres, if any. If necessary, advice should be sought from the ***Deputy Duty Holder: 0191 227 7797 or 0771 012 0145.***

Where ACM can be left undisturbed by the work, the 'persons' within Campus Services are to ensure that they remain undisturbed as the work progresses.

Where licensed removal work is necessary, it **must** be carried out by a licensed asbestos removal contractor under the direct supervision of an independent qualified asbestos analyst.

Once the ACMs have been removed or encapsulated, and a completed 'Stage 3/4' Air Clearance Certificate of Assurance/Reoccupation is issued, the main works can then proceed.

When removal of the ACM is completed, a Hazardous Waste Transfer Note must be received from the removal contractor and forwarded to the University Sustainability Manager *Katie.A.Ridley@northumbria.ac.uk*, this will be retained for a minimum of 3 years.

The Northumbria University Project Manager responsible for managing the works must ensure that the Asbestos Register, plans are updated to show the extent of removal of ACM. When work involves dismantling or demolition of part of the building, its fabric, services, plant or equipment, a Refurbishment and Demolition Asbestos Survey must be commissioned before any work commences.

### 3.4 Work in Areas Where No ACMs Have Been Identified

Where **no** ACMs have been identified in the asbestos register, but dismantling or demolition of part of the building, its fabric, services, plant or equipment is involved, a Refurbishment and Demolition Survey must be commissioned. This must be documented for reference. "No work that would involve dismantling or demolitions of part of the building shall commence until the report has been issued to all parties and fully understood".
If the Refurbishment and Demolition Survey discovers ACM, follow the procedure in Section 3.3.
If the Refurbishment and Demolition Survey does not find ACM, all persons involved in the works must proceed with caution, using their asbestos awareness training as a guide.
If potential ACMs are disturbed during the works, then persons must stop work and, if necessary, follow the emergency response procedure identified in Section17 and Appendix 8.
After the area has been cleaned, the project manager must ensure that the Asbestos Register is updated to show the extent of removal of ACM.

### 3.5 Management Surveys

***CAR 2012 Regulation 4 'The management of Asbestos in Non-Domestic Premises***

All pre 2000 buildings within the University estate have an asbestos management survey which is held in the relevant building asbestos register.

A management survey is the standard survey required to enable the University to meet the duty to manage ACMs as required under the above regulation. Its purpose is to access and locate, as far as reasonably practicable, the presence and extent of any suspect ACMs in a building which could be damaged or disturbed during normal occupancy, including foreseeable maintenance and installation, and to assess their condition.

The survey will usually involve sampling and analysis to confirm the presence or absence of ACMs but may also involve presuming the presence of ACMs, particularly where areas are inaccessible. The extent of the survey will be conducted dependent upon the scope and level of intrusion required to provide sufficient information on the presence of ACM. This should include inspection of underfloor coverings, above false ceilings and inside risers, service ducts, lift shafts etc.

The normal approach will be to commission management (previously type 2) surveys through consultants accredited by the United Kingdom Accreditation Service (UKAS) as complying with ISO17020 – for undertaking surveys for asbestos containing materials.

The information from all property surveys is held in TEAMS and the Asbestos Register.

### 3.6 Intrusive Works

***Regulation 5 – Identification of the Presence of Asbestos***

Where the University is to undertake work in demolition, refurbishment, construction or maintenance, it must undertake a suitable and sufficient assessment as to whether asbestos is likely to be present. All existing data is to be reviewed prior to a refurbishment and demolition survey being undertaken.
Intrusive Work includes (though not exhaustive) all demolition or breaking out, forming openings (of any size) in walls, floors, ceilings and roofs, opening up of ducts, boxing or voids, lifting of coverings

etc.

### 3.6.1 Minor Intrusive Work

Where appropriate, additional site inspections will be arranged with VEGA to enable a suitable and sufficient assessment to be made. This may include taking additional samples. Any such work will be undertaken in accordance with HSG264 and samples submitted for analysis to a consultant accredited by the United Kingdom Accreditation Service (UKAS) as complying with ISO17025 for the analysis of bulk samples to establish the presence and type of asbestos.

A refurbishment survey must be commissioned from an approved framework consultant accredited by the United Kingdom Accreditation Service (UKAS) as complying with ISO17020.

### 3.6.2 Refurbishment and Demolition Surveys

A refurbishment and demolition survey is needed before any refurbishment or demolition work or other work involving disturbing the fabric of the building is carried out. This type of survey is used to locate and describe, as far as reasonably practicable, all ACMs in the area where the refurbishment work will take place or in the whole building if demolition is planned. The survey will be *'fully intrusive'* and involve destructive inspection, as necessary, to gain access to all areas, including those that may be difficult to reach. A refurbishment and demolition survey may also be required in other circumstances e.g. when more intrusive maintenance and repair work will be carried out or for plant removal or dismantling.

The standard to be adopted for refurbishment and demolition surveys is described in HSG 264 Asbestos –The Survey Guide / Appendix 1.

New surveys will be commissioned through the approved NEUPC framework and consultants are to be accredited by the United Kingdom Accreditation Service (UKAS) as complying with ISO17020 – for undertaking surveys for asbestos containing materials. Where this option is chosen, any samples taken will be forwarded for analysis to a consultant accredited by the United Kingdom Accreditation Service (UKAS) as complying with ISO17025 for the analysis of bulk samples to establish the presence and type of asbestos.

The information obtained from all surveys or assessments is a key component to the management plan and is held on the asbestos register.

A Pre-Survey Questionnaire, Appendix 10, must be completed and submitted to the approved Asbestos Consultancy for all surveys.

### 3.7 Duty Holder's Use of Survey Information

All survey reports must meet the requirements of the client and comply with the tender/contractual obligations. The report should be fit for purpose.

# 4.0 Management of Asbestos Containing Materials

Managing ACM under the Regulations involves assessing the risks of exposure, deciding on the correct action to take to avoid this, and monitoring the condition of ACMs while they remain in place. Monitoring is intended to avoid the risk of exposure to airborne fibres released from ACM that have been

left in place because they were initially assessed as low risk but which subsequently deteriorate or are damaged.

The first stage of this procedure involves giving each identified ACM a risk assessment score, as a basis for deciding what action needs to be taken to control exposure. From this, the ACM in question can be repaired, removed, or monitored to ensure it remains in good condition. To do this:

a) ***Priority Risk Assessments*** will be completed for all known ACM on the appointed consultants 'Vega Environmental' database 'TEAMS' using a scoring method based on the algorithm in *Appendix 4, HSG 264 Asbestos: The Survey Guide.*
b) The ***Material Assessment*** and ***Priority Assessment*** scores will be added together for each known ACM to produce a ***Risk Assessment*** score, and this entered in a field on the 'TEAMS' asbestos entry.
c) Annually, Vega will provide a register of all ACMs present in University buildings, ranked by their *Risk Assessment* score.
d) Working from the highest scores down, a risk based report will be produced by to allow a decision to be made in the case of each ACM listed by the Asbestos Management Group, whether:

i. No action is required;
ii. Protection or enclosure is required;
iii. Sealing or encapsulation is required;
iv. Repair is required;
v. Removal is required.

e) VEGA Consultants will draw up a list of all known ACMs allocated to each one of these five categories and arrange for the actions to be carried out as necessary for every ACM under categories ii-v.

f) **Monitoring** *(actions i-iv)*

i. The inspection frequency for ACM or groups of ACMs will be carried out annually; **OR** following significant changes to the use of the premises which may impact on identified ACM.
ii. All staff have a duty of care to report any defects or concerns to the Helpdesk.
iii. If an ACM shows signs of damage, an assessment of remedial options will be carried out.
iv. The Deputy Duty Holder will ensure this information is recorded on the TEAMS Database.

g) **Remedial work** *(actions i-iii)*

i. Where licensed remedial work is required, working methods must meet general requirements for asbestos removal work requiring a licence, and as a minimum standard the methods described in the task guidance sheets listed in HSG210-The Asbestos Essentials Task Manual.
ii. For further details, see the *Section 10.2* below on asbestos removal work.

h) Once this work has been done, Vega will update TEAMS and the Asbestos Register. This will be monitored by the Deputy Duty Holder.

i) If the removal is urgent, if necessary, follow the emergency response procedure identified in *Section 17.0* and Appendix 7.

j) In each case, where some action needs to be taken to prevent exposure because the ACM condition has deteriorated, removal or repair action must be indicated, and the list of ACM that requires action

passed to the Deputy Duty Holder for inclusion in a repair/removal programme.

## 4.1 Recording ACMs and Managing Risk

### 4.1.1 Asbestos Register

ACMs are effectively recorded and managed using the management software package TEAMS data base produced by VEGA Environmental Consultants procured by the University. The database records the location and condition of ACMs by Campus, building, floor, room or individual space.

In order to carry out work on University buildings without exposing people to asbestos fibres, it is important that the University information on ACM in Technical Electronic Asbestos Management System (TEAMS) and the Asbestos Register are kept accurate and up-to-date, as information changes when known ACMs are removed or new ACMs are found. This means that, with a few potential exceptions, employees and contractors will know where ACMs are located and can then take action to avoid them.

All required University buildings have been surveyed and are annually re-inspected, the survey reports form the Asbestos Register.

Since January 2010 the Health & Safety Executive's standards for surveying, sampling and assessment of ACM is now set down in HSG 264 Asbestos: The Survey Guide explains the different types of survey and where they should be used, amongst other matters.

### 4.1.2 Information Recorded

The register records known and suspected ACMs within the University. Where this information is completed, the asbestos register will automatically generate a "Material Risk Assessment Score" as identified within HSG264 Asbestos – The Survey Guide/Appendix4.

### 4.1.3 Additional Information Recorded

At the discretion of the Duty Holder/Deputy, additional information may be recorded.
Where this information is completed, the asbestos register will automatically generate a "Priority Risk Assessment Score" as identified within HSG264 Asbestos – The Survey Guide.
In addition, relevant supporting documents will be stored against the appropriate record. These may include:

- Bulk Sample Analysis Reports;
- Reassurance AirTests;
- Four Stage Clearance Certificates;
- Waste Consignment Notes (the register will also record information non-ACMs where they have been sampled as part of the survey process or where they may be confused with ACMs).

### 4.1.4 Updating the Register

In order to carry out work on University buildings without exposing people to asbestos fibres, it is important that the University information on ACM in TEAMS and the Asbestos Register is kept accurate and up-to-date, as information changes when known ACMs are removed or new ACMs are found. This means that, with a few potential exceptions, employees and contractors will know where ACMs are located and can then take action to avoid them.

The register will only be updated by Vega, updates required include:

- Re-inspection of the ACM;
- Removal, repair or encapsulation of the ACM;
- Identification of further ACMs;
- New management surveys;
- New refurbishment and demolition surveys;
- Changes in building layout or area use;

The record of the ACM will be archived each time an update is made by the Planning & Database Officer; barry.browning@northumbria.ac.uk.

All materials identified during the survey process are assessed and an action plan for remedial works put in place via the Asbestos Working Group.

The following programme for updating the register following planned works and any remedial work with ACMs is to be implemented:

a) Updating information on TEAMS and the Asbestos Register will start with either a Management or Refurbishment and Demolition Survey, a bulk sample of suspect material, a clearance certificate or certificate of re-occupation, depending on whether the building or part of it is being surveyed for ACM, or known ACMs are being removed.
b) The Project Manager will normally issue a certificate of practical completion at the end of the project, and pass the project drawings to the Capital Works Manager, who in turn will ensure the information is entered by the Campus Planning & Database Officer.
c) The Maintenance & Project Manager will also pass the file to the Capital Works Manager, who in turn will ensure that the information for small, non-tendered projects is entered by the Planning & Database Officer; barry.browning@northumbria.ac.uk. The Campus Planning & Database Officer will be advised by the Capital Works Manager of any asbestos identification removal or encapsulation on a weekly basis and will update plans accordingly.
d) For residential buildings managed under an outsourced TFM contract, the TFM provider is responsible for step C above.
e) For Non-residential buildings managed under an outsourced Hard FM contract, the Hard FM provider is responsible for step C above.
f) The information on file will fall into one of three categories:
   i. Known ACMs that have been removed to allow the works to proceed;
   ii. ACM discovered during the works and removed;
   iii. ACM discovered during the works and left in place.

   The Campus Planning & Database Officer will use this information to update the 'asbestos layer' on CAD drawings and the *pdf* drawings in the main Asbestos Register. This will be done by marking the presence of new ACM on the floor plan in red ink (unless ACMs have been removed) and typing a note with a cross reference to the relevant Consultant Analysts report. The Capital Works Manager will then issue the updated information to the Security Manager to update their records.
g) Summary information must be used to complete the TEAMS entry and will be transferred to Vega administrative staff for them to update the TEAMS Asbestos Database;
h) If the asbestos survey, bulk sample or other report deals with the discovery of ACMs that were previously unknown then that report must be electronically filed in the appropriate premises folder on the Campus Services shared drive. The plans in each Asbestos Register will be updated accordingly. All of the above actions will be monitored/audited quarterly by the Deputy Duty Holder/Capital Works Manager, to ensure accuracy.

i) Copies of air tests, four stage clearance certificates and waste consignment notes appended against the appropriate ACM record.
j) Where the work involved ACMs covered by several records, the documents will be appended to the first record in numerical order but all consecutive records will be updated.

The TEAMS Database and hard copy asbestos registers will be constantly updated when:

- Further investigation has been conducted;
- Sampling and remedial works are carried out;
- Following an incident, and as per procedural audit review.

### 4.2 Building Plans/Drawings

Building plans/drawings are held in PDF format, marked up with locations and the extent of ACMs identified throughout the University.

Note: Where ACM's include debris and residues are localised, the plans are marked up specifically to show areas affected.

### 4.3 Storage and Availability

The custodian of the records shall be the Duty Holder.

The register will be stored both electronically on the appointed Environmental Consultants – VEGA- 'TEAMS' system and hard copy held in the following locations:

**Non-Residential Buildings:**

- Campus Services in Pandon Building, Camden Street, Newcastle upon Tyne NE2 1EX
- Coach Lane Campus - Security Office (Building 10 of Campus Map Refers)
- Sutherland House – Security Office (Building 32 of Campus Map Refers)

A printed copy of the Asbestos Register is available from University Campus Services by request.
If larger drawings are required they should requested by email from Douglas Abbott within the Campus Services Project Team: barry.browning@northumbria.ac.uk .

**Residential Buildings:**

- Claude Gibb Reception (Building 5 of Campus Map Refers)

For Out of Hours arrangements see Section 12.2.4 of this document.

Read-only access will be available to all designated/authorised University personnel through their portal. Access will be available to authorised external consultants, contractors and staff through the Estate and Facilities web portal - http://portal.vegaec.co.uk/Account/Login?ReturnUrl=%2f

A request for authorisation can be made via email to Vega.

### 4.4 Accessing the Asbestos Register

Users accessing the asbestos register must provide information on the reason for their enquiry

where appropriate.

### 4.5 Monitoring and Re-inspection

4.5.1 Re-Inspections

Re-inspections are carried out on a regular basis dependent upon the material's overall risk rating. The re-inspections are carried out by the contracted consultant (Vega) and the data gathered used to maintain the asbestos register with up to date information and to inform the asbestos action plan for removal/remediation works.

All ACMs will be re-inspected at between six to twelve months intervals as determined by the risk assessment rating.

## 5.0 Management Action

### 5.1 Strategy

Where ACMs are in a safe condition and are unlikely to be disturbed they will be left in situ. They will be inspected regularly at intervals determined by the Duty Holder/Asbestos Consultant. This will typically be every twelve months but may be less or more based upon risk assessment. Areas of minor damage will be assessed, repaired and sealed. Where effective repair cannot be achieved ACMs will be removed.

*All work with ACMs will be undertaken by a licensed asbestos contractor from the University's NEUPC framework irrespective of whether work actually requires a license.*

### 5.2 Assessment of Action Priorities

All ACMs will be subject to a material risk assessment score in accordance with HSG264/Appendix4. This will be the prime guide in assessing priority for action. This algorithm assesses the likelihood of an ACM releasing fibres if it is disturbed and considers:

- Product type;
- Extent of damage;
- Surface treatment;
- Asbestos type.

Each of the parameters is scored and added to give a total score between 2 and 12:

- Materials with scores of **10** or more should be regarded as **high risk** with a significant potential to release fibres if disturbed.
- Those with a score between **7** and **9** are regarded as **medium risk**.
- Materials with a score between **5** and **6** are low risk.
- Scores of **4** or **less** are very low risk.

The decision to instigate remedial action is at the direction of the Duty Holder, however where an ACM has a recorded score of **8** or **above,** action would normally be required. Where no action is to be taken, the Asbestos Consultant will record the reasons on the Asbestos Register including details of the other

control measures that are being relied upon.

Guidance from the HSE states there is no requirement to provide a priority assessment during a demolition or refurbishment survey, as it is assumed that all identified ACM's will be removed or a remedial action will take place.

The priority assessment score combined with the material assessment score gives us the risk score. The risk score should be used as an indicator of the re-inspection frequency of that particular ACM, a score of 1 – 11 has a recommended re-inspection frequency of 12 months, a score of 12 – 17 has a recommended re-inspection frequency of 6 months and a score of 18 – 24 has a recommended re-inspection frequency of 3 months.

**Guidance:**

Full details of the algorithms used can be found in *HSG227 'A Comprehensive Guide to Managing Asbestos in Premises'* (Ref. 3).

## 6.0 Labelling

See Appendix 2 for more information on labelling requirements.

## 7.0 Risk Assessment

Before commencing any work on ACMs, a risk assessment must be carried out to assess the potential risk of exposure to asbestos, and appropriate steps put in place to prevent or reduce exposure. Where there are no asbestos risks – and tasks that differ from asbestos related activities. e.g. cleaning, removals – further risk assessments will be required. Further risk assessment guidance can be found here.

At the discretion of the Duty Holder/Deputy, known or suspected ACMs may be the subject of a Priority Risk Assessment as defined in HSG227 *'A Comprehensive Guide to Managing Asbestos in Premises'*. The assessment will automatically be generated by the asbestos register software after data entry and will be reviewed by the Asbestos Duty Holder/Deputy who will decide on appropriate action.

## 8.0 Authorisation to Work

When Faculty staff, students or other building occupants plan to carry out any work which might disturb the fabric of the building, a Contractor on Site/Authorisation Notification to Work' request form and adequate and sufficient safe system of works must be completed and submitted to the Campus Services representative e.g Project Manager / Maintenance for review and approval.
This should be also be sent to the Campus Services Help Desk. CR Helpdesk CRHelpdesk@northumbria.ac.uk

# 9.0 Training

## 9.1 University Staff

Regulation 10 of the CAR2012 places a duty on an employer to ensure that they provides adequate, information, instruction and training to employees. The University will support this AMP, by providing asbestos training and refresher training at an appropriate level to all relevant University staff.

Asbestos training is mandatory for all staff who may come into contact with asbestos and for those who may disturb asbestos in the course of their work. In particular, it will be given to all Northumbria University workers involved in demolition, refurbishment, maintenance, construction and allied trades where it is foreseeable that their work will disturb the fabric of the building because ACMs may become exposed during their work.

Training will be delivered by the appointed third party - VEGA Asbestos Consultants - as the competent person described in Clause 139 of Approved Code of Practice (ACOP) L143 – Managing and Working with Asbestos. At the core of all training will be asbestos awareness as specified in the ACOP. The scope of the training will include:

- The properties of asbestos and its effects on health, including the increased risk of lung cancer for asbestos workers who smoke.
- The types, uses and likely occurrence of asbestos and ACMs in buildings.
- The general procedures to be followed to deal with an emergency, for example an uncontrolled release of asbestos dust in the workplace.
- How to avoid the risks from asbestos, for example for building work, no employee should carry out work which disturbs the fabric of the building.
- Specific information, instruction and training to reflect the requirements of this AMP and the role being undertaken.

The schedule below (Table 1) specifies the training that will be provided to particular groups of workers and further information for understanding competency requirements can be found here.

Refresher training will be delivered at intervals to be determined by the Duty Holder, but would not normally be more than 12 months and will be as required in response to changes in legislation, serious incidents or significant changes in the AMP.

## 9.2 Consultants and Contractors

Any staff working for Contractors and Consultants in University properties built before 2000 must have received asbestos awareness training as specified in the Control of Asbestos Regulations 2012 (CAR 2012), evidence of compliance must be available on request.

In addition, contractors working on maintenance tasks must undertake the Campus Services Contractor Induction which will include information on how to access the asbestos register and emergency action response processes. *(Section16.0/16.2/Page13/14 refers).*

Contractor personnel working on project work must receive a Site Specific Induction* that may include a tool box talk on local asbestos risks by the Deputy Duty Holder.
(*The Site Specific Induction may be delivered by the Contractor but is subject to agreement at the pre-start meeting).

Consultants acting as Project Managers are required to attend the University in-house training module as specified below.

### 9.3 Duty Holder/Deputy Duty Holder

Will attend such courses e.g. BOHS P405/407- 'Management of Asbestos in Buildings' as they may be required to remain up to date with current legislation, best practice and any other matters that will maintain their competence.

### 9.4 HSE 'Asbestos Beware'

The HSE has launched a web application campaign aimed at the public sector to help highlight the dangers contractors face whilst working on site. This encourages trades persons to think about asbestos on every job so they are aware of the dangers it presents. There is an app available for mobile devices that helps to easily identify where ACM's could be present.

**Table1: Summary of University Asbestos AwarenessTraining**

| Attendees | Course Content |
|---|---|
| Direct Labour, Maintenance Managers. | • Asbestos awareness in accordance with CAR 2012<br>• Procedures for planned and reactive maintenance<br>• Accessing and limitations of the asbestos register<br>• Call Out Procedures<br>• Emergency Procedures<br>• Refresher training as directed |
| Project Managers, Maintenance Managers, Consultants acting as PMs. | • Asbestos awareness in accordance with CAR 2012<br>• Procedures for Project Management – HSG65 &CDM[15]<br>• Accessing and limitations of the asbestos register<br>• Emergency Procedures<br>• Refresher training as directed |
| Partnered Contractors undertaking maintenance e.g. CBRE, Sodexo and Project Work<br><br>* Those like to disturb ACM. | • Asbestos awareness in accordance with CAR 2012<br>• Campus Services Contractor Induction<br>• Procedures for planned and reactive maintenance<br>• Accessing and limitations of the Asbestos Register<br>• Call Out Procedures<br>• Emergency Procedures<br>• Site specific tool box talk<br>• Risk Assessment & Method Statements<br>• Refresher Training, as directed |

| | |
|---|---|
| Building Managers, Health and Safety Advisors. | • Asbestos awareness in accordance with CAR 2012<br>• Accessing and limitations of the Asbestos Register<br>• Emergency Procedures<br>• Refresher training as directed |
| Technical Managers, Technicians, I.T Network Staff.<br><br>Faculty/Service Department's responsibility to arrange. | • Accessing and limitations of the Asbestos Register<br>• Emergency Procedures<br>• Refresher training as directed |
| Campus Security<br>Training delivered by Central Health and Safety Team | • Accessing and limitations of the Asbestos Register<br>• Emergency Procedures |
| Campus Services Cleaners<br>Training delivered by Central Health and Safety Team. | • Basic Awareness<br>• Emergency Procedures |

# 10.0 Work with Asbestos Containing Materials

### 10.1 Contracting the Services of Licensed Asbestos Removal Contractors, Asbestos Surveyors and Analysts

Campus Services agreed method of asbestos abatement work involving asbestos removal is to only employ a Licensed Asbestos Removal Contractor (LARC) registered to the Universities Procurement Framework (NEUPC) for all work on licensed activities, and to monitor their work through the services of an independent asbestos analyst. The LARC will supervise the work being carried out.

The Campus Service Project Manager will submit the plan of work to the Health & Safety Executive North East Area Office, monitor the work on site, as well as conduct various air sampling tests.

Campus Services Procurement will maintain a list of vetted and approved contractors, and shall have available the services of approved competent consultants, full details of which shall be available from them.

It is necessary to monitor the LARC to ensure work is not putting people at risk and is being carried out as specified in the method statement submitted to the Health and Safety Executive's Area Office. To do this, the persons within Campus Services, LARC Supervisor, or appointed analyst, must carry out some simple checks, such as:

a) **Analyst:** Be present at the smoke test to witness that the enclosure does not leak and that the equipment specified in the contractor's method statement is present and has a valid test date.

b) **LARC Supervisor:** Check that operatives are wearing their personal protective equipment (PPE) and using controlled wetting techniques if specified in the method statement, using the vision panels in the enclosure. Obtain confirmation from the analyst that the enclosure is clean. Make a visual check of the area for ACM and debris after the enclosure has been removed.

In addition, the Capital Works Manager and the Central Health and Safety Team will audit asbestos removal work on a sample basis to ensure that it complies with the standards described in HSE's guidance and this policy.

The process for LARC procurement is outlined in **Appendix 11.**

### 10.2 Working with Asbestos Containing Materials

All work with ACMs is to be carried out by Specialist Contractors holding all required statutory licenses and insurances. This requirement shall also apply to ACMs defined in Regulation 3(2) (c) (ii) as non-modifiable. Unlicensed contractors shall not be permitted to work on, disturb, or interfere with any ACM's.

### 10.3 Asbestos Abatement Works

Asbestos abatement work managed by the Planning and Development Team can **only** be carried out by University approved Licensed Asbestos Removal Contractors (LARCs).

Where part of a building is planned for refurbishment and a survey identifies ACMs will be affected by the work, an abatement specification will be drafted and the asbestos removal will be programmed into the refurbishment plan. This will be coordinated by Asbestos Working Group and either procured directly by the University or instructed to be carried out under the project by the Principle Designer/Project Manager/Principal Contractor. Guidance on the procedures to be followed in each case is provided in **Sections 11 & 12**.

Where an ACM requires removal due to a change in condition or if it will affect maintenance work, the Project Manager will coordinate the required removal works using one of the University's licensed framework contractors. Background, leak, reassurance, clearance and personal monitoring shall be carried out by University approved consultants who are accredited by UKAS to ISO/IEC 17025:2005.

#### 10.3.1 Asbestos Remediation Work

Work involving the repair, encapsulation or removal of ACMs may only be carried out by the University's approved NEUPC framework of HSE licensed asbestos contractors. Appointment of contractors will generally be made directly but may be made through a Principal Contactor.

Remedial action will be carried out where:

- Remedial action was identified following inspection under the AMP.
- The work is required to facilitate a maintenance task.
- The work is required to facilitate a planned project.
- ACMs are to be removed prior to demolition.
- There is a strategic benefit.
- There are unplanned circumstances such as damage to ACMs, leaks or bursts in pipes etc.

The scope and specification of such remedial action will be at the direction of the University

Work with ACMs requires effective management which includes clear communication with and consideration of building stakeholders. The timing of the work to be undertaken will be based on an assessment of the inherent risks and may need to be undertaken out of normal working hours as directed by Project/Maintenance Management.

Work falls into three categories:

- Licensed work
- Notifiable non-licensed work
- Non-licensed work

The contractor is responsible for making the correct notification in accordance with their license conditions. A copy of the notification together with the plan of works must be provided to the Asbestos Duty/Deputy Duty Holder/s and the Asbestos Consultant (where appointed) before work commences.

HSE submission forms

- Notification of Non-Licensed Work with Asbestos; ***ASB NNL W1*** is found here
- Licensed Work Notification; ***ASB5*** is found here

### 10.4 Air Monitoring and Four Stage Clearance Certification

Where air monitoring and four stage clearance certification is required, this may only be carried out by one of the University's approved framework asbestos consultants. The consultant must be accredited by the United Kingdom Accreditation Service to 17025.

The Asbestos Consultant/Contractor will specify the extent of attendance that may be required by the Asbestos Consultant after consideration of the inherent risks, timing of the work and the local stakeholders. Analytical duties may include:

- Examining the contractor's daily log and documents.
- Reviewing the contractor's performance against the specification, plan of work and programme.
- Ensuring that asbestos materials are removed in a manner that prevents exposure, or if this is not possible to minimise the exposure.
- Ensuring that general site safety is kept at an acceptable level and any permit to work system is adhered to.
- Reporting progress to the Project Manager and Asbestos Coordinator.
- Witnessing of smoke test to confirm the integrity of the enclosure.
- Ensuring the enclosure is leak-proof (where there is one).
- Providing background monitoring during the asbestos removal process to demonstrate fibre levels are not elevated above normal.
- Providing personal monitoring when required to assess the effectiveness of dust suppression control measures and the suitability of respirator protection.
- Providing reassurance monitoring as required.
- Providing a Certificate of Reoccupation as part of a four stage Site Assessment for reoccupation as follows:

    i. Preliminary check of site condition and completeness.
    ii. A thorough visual inspection inside the enclosure/work area.

iii. Air monitoring to establish that the respiritable airborne fibre concentration within the enclosure is below the clearance indicator (0.01fibres/ml).
iv. Final assessment post-enclosure/work area dismantling.
v. Certifying the decontamination unit is clean including clearance indicator testing.

### 10.5 Control of Hazardous Waste

ACMs shall be double bagged in clean sealed and labelled sacks (or wrapped) and be removed as it is produced. Bags may only be carried on transit routes agreed by the Asbestos Coordinator for immediate removal from site or to a lockable container in an agreed location on site.

All asbestos waste shall be disposed of to a site licensed to receive it in accordance with the Hazardous Waste Regulations 2009. The contractor responsible for the waste consignment will provide documentary evidence of the safe disposal to the Campus Services Sustainability Advisor.

Further guidance can be found here.

## 11.0 Asbestos Management Plan for Project Work

### 11.1 Scope

The asbestos management plans for undertaking project work where ACMs are known to be, or suspected of being present, are set out in Appendices 3 to 5. These procedures must be followed by all departments.

The phases of project work break down into:

- Demolition phase
- Pre-construction phase–Appendix 3
- Construction Phase–where remediation is not anticipated–Appendix 4
- Construction Phase –where remediation is required–Appendix 5

Where external consultants are employed these procedures must be adhered to.

### 11.2 Protocol during Operational and Capital Works Projects

Where refurbishment works are planned to the fabric of any of the buildings managed by *Campus Services.

Asbestos abatement activities can be undertaken as enabling works and managed by the University or they can be managed by the Principal Contractor.

**The Campus Services Project Manager (CSPM) in this instance refers to Project Managers, Project Engineers, Maintenance Engineers and Maintenance Services who during the course of their work commission contractors to carry out work that may disturb the fabric or services of the University's buildings.*

The following protocols must be applied in these situations;

- The CSPM will complete VEGA Asbestos Consultants – Pre Survey Questionnaire form, Appendix 10. VEGA is to be provided with a full scope of the planned works, exiting/proposed drawings and details of any other area/s potentially affected by the planned works to
- The CSPM must review the asbestos register for the building concerned based upon the project specification and identify any known asbestos in the location of the works.
- The CSPM must identify the requirements for additional investigations during the Asbestos Survey Brief
- The CSPM will issue the information from the survey brief to the framework accredited asbestos survey consultants for pricing and appoint further survey works as required.
  *(Ideally a full refurbishment survey should be carried out but this is not often possible in occupied premises. Dependent upon timescales this may involve a phased approach of localised intrusive investigations under occupied conditions with fully intrusive surveys immediately prior to commencement of the project)*
- The CSPM will review the Asbestos Survey Report to ensure it is fit for purpose.
- Where the asbestos survey identifies no ACMs this information should be handed over to the contractor carrying out the refurbishment. Where minimal low risk asbestos materials are identified the CSPM should compile an abatement schedule.
- Where removal works are complex and require considerable technical input, the CSPM will instruct the survey consultant who conducted the survey to compile an abatement specification for the planned works.
- At tender stage, the CSPM will issue the asbestos abatement schedule to the framework LARCs and instruct the relevant asbestos removal work. The CSPM will issue the asbestos abatement schedule to the framework analytical consultants and instruct the relevant air monitoring work. ***Under no circumstances should the analytical company be appointed directly by the asbestos removal contractor.***
- The CSPM will ensure that risk assessments and method statements (RA/MS) from the removal contractor are submitted not less than 10 working days prior to submission of the ASB5 notification to the HSE for notifiable work or not less than 10 working days prior to commencement on site for non-notifiable work.
- Upon completion of the work the CSPM should receive copies of all clearance certificates and updated asbestos information either in the form of a new asbestos survey report, or a certified summary of asbestos removal works including evidence of checks on non-notifiable items.
- The CSPM shall submit the updated asbestos information to Vega to update the relevant buildings Asbestos Register.

# 12.0 Asbestos Management Plan for Maintenance Activities

### 12.1 Background and Scope

This plan is to be adopted for all maintenance activities undertaken on behalf of Campus Services in buildings constructed before 2000.

It is important that all those undertaking maintenance activities recognise the limitations of the asbestos register and also understand the impact of their activities on the fabric of the building. Any staff or contractors undertaking maintenance work must therefore have received asbestos awareness training as specified in CAR 2012.

Where any work is to be undertaken in a building constructed before 2000 that is likely to be intrusive in nature, the Duty/Deputy Duty Holder should be consulted.

Intrusive work includes all construction, demolition or breaking out and forming openings, (of any size) in walls, floors and ceilings, opening up of ducts, boxing or voids and lifting of coverings etc. **IF IN DOUBT ASK.**

**Guidance:**

Campus Services is directly responsible for maintenance of the University's built-estate, which comprises of academic, residential and administrative premises across two Campuses.

The estate includes a mixed standard of 52 building facilities (floor area of estate circa 223,000m$^{2)}$, ranging from new purpose built spaces, buildings from the 1960's and 1970's through to historic converted churches and other listed buildings.

Note: Our London Campus is out of scope

The Campus Services maintenance team employs labor directly in all aspects of building trades undertaking preplanned preventative, routine and reactive maintenance including providing a 24 hour call out service 7 days a week. The maintenance team are also supported by a number of "embedded" contractors, e.g. CBRE, providing specialist services such as alarms, access control, building management systems and water quality etc. In most instances the personnel working for the specialist companies are based permanently at the University.

The majority of work undertaken is not intrusive in nature and ACMs are unlikely to be disturbed. Nevertheless, the University has a duty to inform employees and others who may work in the vicinity of ACMs of their presence. Therefore, these procedures must be followed.

## 12.2 Maintenance Procedures

### 12.2.1 Checking the Asbestos Register

All those undertaking maintenance work in buildings constructed before 2000 must check the Asbestos Register before starting work.

All those checking the register must record the works order number as part of the data enquiry to enable an audit trail of the asbestos management procedures

### 12.2.2 Reactive, Planned and Preventative Maintenance Asbestos Management Plans

The plans for managing maintenance activities are set out in the following appendices:

Reactive and Planned Preventative Maintenance by Direct Labour – Appendix 6.
Reactive and Planned Preventative Maintenance by Embedded Subcontractors– Appendix 7.
Emergency Call Out for Reactive Maintenance–Appendix 8 ('Out of Hours' section 12.2.4 also refers).

### 12.2.3 Day to Day Maintenance Works

Campus Services and the embedded Contractor CBRE utilise an integrated management system to manage the day to day maintenance works across the University. The system includes the control gate mechanisms to

notify persons e.g. Surveyor, Engineer, Supervisor, Contractor, Operative and identify ACM's at the stage works notes/requests are issued. Where the note advises asbestos may be present, the asbestos register must be consulted.

12.2.4 Out of Hours Call Outs

The University operate an out of hours call out service for attending emergency faults, repairs and breakdowns. An approved asbestos remediation contractor shall be available on 24hr call out to attend any ACM's which may be encountered by operatives attending the premises out of normal working hours. Full contact details for the remediation contractor shall be provided. The Surveyor, Engineer, Supervisor, Contractor, Operative is to is to engage the remediation Contractor to deal with any material which they suspect may contain asbestos.
All works out of hours; Mon-Fri 1700hrs-0730hrs, including weekends must be approved.

12.2.5 Contractors must:

- Provide a list of all personnel who will be engaged during these works activities.
- Conduct a specific risk assessment for lone working activities as required.

12.2.6 Essential Contact Information

- University Security: 0191 227 3999 (24hr)
- Campus Services Helpdesk: 0191 227 4070
- Health and Safety: 0191 243 7797
- Asbestos Duty Holder: 0191 243 7797

**12.3 General Control Procedures**

12.3.1 Entry into Asbestos Contaminated Area/s

Access to known contaminated areas will not be permitted unless authorized by the Duty Holder and an approved risk assessment is in place.

Access can be gained by following the Campus Services Lock Suite Procedure. Keys are only authorised by appointed persons within Campus Services.

# 13.0 Coach Lane Campus

To ensure the safety of those working at any of the premises at Coach Lane Campus, the following procedures have been implemented.

A copy of the registers relating to Coach Lane properties will be held by the Security Office at Coach Lane Campus.

They will be responsible for ensuring that before keys are given out to any contractor or internal maintenance operative coming on site, that the relevant Asbestos Register is consulted.

The Contractor or Maintenance Operative will then sign a duplicate register sheet to acknowledge they have been informed of the content of the register.

If it is identified in the register that ACMs have been identified in that area the Campus Services Representative e.g. Project Mananger, Duty Holder/Deputy Duty Holder must be consulted prior to work commencing.

In the event that no ACMs have been identified then the procedure in Section 3.4 of this policy must be followed.

Similarly, in the event of ACM being damaged during the course of the work then the procedure in Section 17 of this policy must be followed.

# 14.0 Asbestos Management for Halls of Residence/Student Accommodation

### 14.1 Background and Scope

Sodexo manage the accommodation estate on behalf of the University. The Sodexo Asbestos Management Plan is in accordance with the University Policy. An annual review of performance will be carried out.

# 15.0 Retained Areas

The University has retained the responsibility to areas which operate catering and hospitality facilities. Campus Services will maintain an asbestos register for these areas and any work undertaken, either maintenance or new installations, will be in accordance with the details previously set out in this AMP.

# 16.0 Specialist Installations

The University remains responsible for the installation of data cabling and CCTV throughout its estate. Any work undertaken will be in accordance with the procedures set out in this AMP. The inspections, where required, will be undertaken on behalf of the University in accordance with this AMP. Any relevant findings will be passed for incorporation into the Asbestos Management Plan.

# 17.0 Emergency Response

### 17.1 Accidental Disturbance/Damage of Suspect Materials

In any emergency, the primary concern should always be the immediate safety of the building occupants, followed by those who may have to enter the building as a result of the emergency. Emergencies may include but are not limited to; fire, flood, explosion, collapse or power failure, particularly during asbestos removal works. In the event of one of the emergencies listed, the presence of ACMs should not cause the significant release of respiritable asbestos fibres. The area should be evacuated and secured, the asbestos register should be checked at the earliest opportunity and if asbestos was known or thought to exist in the affected area, then it should remain secured until an investigation can take place.

The procedure set out in Appendix 9 must be adhered following the discovery of significantly damaged suspected or known ACMs or where accidental damage to them has been caused in the course of a work activity.

This section deals with how employees and contractors should respond when they damage ACM during the course of their work. The aim here is to avoid exposure to airborne fibres and minimise

contamination of the area until a licensed asbestos removal contractor can be called to clean up any debris.

Further guidance can be found using the HSE Asbestos Essentials EM1:

a) All persons in the area must **stop** work immediately and the area closed to access. No effort should be made to clean up.
b) Other people must be prevented from entering the area.
c) If any person has got dust or debris on their clothing or overalls, they must remove these and place them in a plastic bag, find facilities to wash or shower as soon as possible, and leave the shower/washroom in a clean state; Further guidance can be found using HSE Asbestos Essentials EM8-Personal Decontamination.
d) The incident must to be reported as soon as practicable. Inform Campus Services Planning and Development Managing Representative e.g. Capital Works Manager, Campus Services Help Desk (0191 227 4100), or the Security Control Room (0191 243 3999). If the incident is out of normal working hours, the Contractor is to notify the Asbestos Consultant, Asbestos Duty/Deputy Duty Holder.
e) After potentially contaminated staff have been satisfactorily decontaminated and removed, the designated Asbestos Consultant will access the affected area with appropriate personal protective equipment and assess the situation. Where it is unable to confirm or dismiss the presence of damaged ACMs, samples will be taken for analysis.
f. The material shall be presumed to be an ACM and the area should be adequately sealed until such time as results to the contrary are received.
g. The Asbestos Consultant will run air tests within the suspected area of contamination and in strategic locations in surrounding areas.
h. If ACMs are confirmed, the Capital Works Manager will appoint an approved framework licensed Asbestos Consultant who will develop and instigate a remedial action plan in accordance with this AMP to repair or remove the ACM including any debris. No access will be permitted into the area to non-specialist asbestos personnel until all work is complete and confirmed clear by the Asbestos Consultant.
i. This work will be supervised by an independent asbestos analyst and a certificate of re-occupation obtained prior to work recommencing.
j. The certificate of re-occupation will then be sent to the Campus Planning & Development administrative staff to update the Asbestos Register. This information will also be updated within TEAMS by Vega.
k. The Duty/Deputy Duty Holder/Health and Safety will investigate the incident and provide a report on their findings to the Assistant Director - Health and Safety. The report will include recommendations on whether the incident should be classed as a "dangerous occurrence". If it is, it should be notified to the Health and Safety Executive under the Reporting of Injuries, Disease and Dangerous Occurrences Regulations 2013.
l. Human Resources must make arrangements to inform all persons who might have been exposed to the uncontrolled release of asbestos of their potential exposure. Where these are University staff, advice will be made available from Occupational Health.
m. In the event of an incident or likely interest by media, if required, the Director of Marketing or his nominated deputy should be informed of the situation.

Following any incident of uncontrolled release of asbestos fibres, this AMP will be reviewed by the

Asbestos Duty Holder.

Where an incident occurs during asbestos removal works, the asbestos removal contractor's emergency procedure will be included within the plan of work and should be followed. Such emergencies may include the requirement to gain access to an asbestos removal enclosure.

### 17.2 Out of Hours Arrangements - Emergency Response

To ensure the safety of those working out of office hours i.e. from 19:00hrs to 07:00hrs and weekends and bank holidays, the following procedures have been implemented.

A hard copy of the Asbestos Registers will be held by the Security Team at City Campus and Coach Lane Campus.

All emergency response contractors must report to the main security office to sign in and collect keys. The Security Team will be responsible for ensuring that before keys are given out to any contractor or member of staff coming on site to respond to an emergency, the relevant Asbestos Register is consulted. The Contractor or member of staff will then sign a duplicate register sheet to acknowledge they have been informed of the content of or have actually consulted the register. A copy of this must be forwarded to the Capital Works Manager as soon as is practical.

### 17.3 Discovery of Suspected Asbestos Containing Material

All staff working in the vicinity, safety representatives, maintenance and building operatives, and those with specific responsibilities, should be informed in writing of the procedure to be followed upon the discovery of suspected ACM.

### 17.4 Discovery of Damage to Known or Suspected Asbestos Containing Material

All staff working in the vicinity, safety representatives, maintenance and building operatives, and those with specific responsibilities, shall be informed in writing of the procedure to be followed upon the discovery of damage to known or suspected ACM.

### 17.5 Reporting Requirements

Any asbestos related incident should be reported to the Asbestos Duty Holder/Deputy Duty Holder immediately who will carry out an investigation and arrange any appropriate air monitoring to help decide if the incident is reportable under RIDDOR.

### 17.6 Occupational Health and Potential Exposure

Only licensed contractors are authorised to carry out work with asbestos and they manage their own health surveillance in line with the requirements detailed in HSE-L143 Managing and Working with Asbestos.

In the event an individual suspects they may have been exposed to airborne respiritable asbestos fibres, report immediately as per section 17.5.

The Campus Services Health and Safety Team will acknowledge the individual's receipt of the incident and record it. Staff are to be referred to the University's appointed Occupational Health Service Provider. Contractors are to follow their own procedural health surveillance arrangements.

The Campus Services Health and Safety Team will review exposure information and forward this to the Occupational Health Service. The information should include:

- Known presence of Asbestos Containing Materials (ACMs).
- Types and accessibility of ACM.
- Potential for exposure following review of work activities and ACMs present.

The Campus Services Health and Safety Team and the Asbestos Working Group will review the Asbestos Safe System of Works information, Risk Assessments and the Health and Safety Policy and discuss the technical aspects of the findings with the Occupational Health Physician.

Occupational Health will arrange for GPs to be informed where requested by the individual.

### 17.7 Asbestos Environmental Consultant Emergency Contact Details

In the event of accidental damage to asbestos, the area should be vacated and sealed off.
Vega will be contacted immediately, contact details are:

**Normal hours:**

- Seaton Delaval Office: 0191 298 0198

**Out of Hours:**

Mobile/home telephone numbers in the following order:

- Neale Walton: **07917 083 626**
- Ross Walton: **07764 245 102 / 07772 557 712**
- Coll Johnson: **07388 327 812 / 0191 276 7642**

One of the above will either attend site themselves, or be responsible for contacting the 'on-call' analyst to arrange attendance.

**Response Time:**

- On site within 90 minutes of being notified of the incident,

**On Site Action:**

- On site air testing and fibre counting to confirm levels of contamination.
- Bulk sampling, with results supplied within 6 hours.
- Contact licensed (and University approved) asbestos removal contractor to attend site to undertake repairs/encapsulation/removal works as appropriate.

## 18.0 Review and Audit

### 18.1 Asbestos Working Group

Membership will comprise representatives from Campus Services; Health and Safety, ***(the Asbestos Duty and Deputy Duty Holders)***, Maintenance and Facilities Services, Planning and

Developments/Projects Compliance and external embedded facilities contractor/representative e.g. Sodexo, CBRE and our externally appointed Asbestos Consultancy, VEGA.

The purpose of the Group is to provide a committee forum which will work together constructively to:

- Provide an opportunity for those stakeholders to share information and exchange views on asbestos issues.
- Cascade this information to the staff within the represented sections.
- Review University AMP annually or sooner if appropriate.
- Consider the effectiveness of existing procedures.
- Discuss the level of internal compliance with asbestos related procedures.
- Discuss the mitigation of uncontrolled releases of asbestos fibres.
- Consider the performance of asbestos related contractors/consultants and the numbers on the framework.
- Discuss training requirements across the University.
- Make recommendations in the light of new asbestos related legislation, guidance and best practice.

The group will be chaired by the Asbestos Duty/Deputy Duty Holder. Meetings will take place quarterly.

### 18.2 Review

This Asbestos Management Plan and associated Asbestos Policy will be reviewed regularly by the Asbestos Duty Holder in consultation with the Asbestos Working Group. The intention of the review is to assess:

- The effectiveness of the AMP.
- The impact of changes in asbestos and other health and safety legislation.
- Changes in the Universities property portfolio.
- Lessons to be learned from significant incidents.
- The impact of changes in personnel, introduction of new roles or corporate restructuring.
- Changes in the University Supplier Chain and Appointed Consultancy.
- Progress against the action plan.

A review will be carried out:

- Annually
- Following a significant incident involving an uncontrolled release of airborne asbestos fibres.
- Following a change in the Control of Asbestos Regulations.
- If the AMP is no longer considered adequate.

### 18.3 Audit

The Duty Holder will undertake an audit of the AMP. The purpose is to review compliance with the AMP and the effectiveness of the measures being taken.

The audit will review the following key indicators though not exhaustive to:

- Planning.
- Management of specific risks.
- Organisation and responsibilities.
- Cooperation, engagement and communication.
- Competence.
- Incidents, injuries, near misses and dangerous occurrences.
- Monitoring and corrective measures.
- Audit and review.
- Leadership and integration.

An audit will be undertaken periodically but not less than every four years.

## 19.0 Asbestos Management Improvement Plan

Table 2 outlines the proposed improvement plan over the next twelve month cycle, commencing March 2018. This is a live document and updates on status can be obtained from the Deputy Duty Holder.

**Table 2 Asbestos Management Improvement Plan**

| Action | Estimated Completion | Status |
|---|---|---|
| Publish new Asbestos Management Plan to replace existing policy document | June 2018 | Draft document submitted for review to AWG/Stakeholders |
| Training for new AMP for Maintenance, Projects, personnel including embedded contractors | | |
| Completion of surveys for properties | | Schedule of properties prepared |
| Re-inspection of known ACMs | Continuously Ongoing | |
| Remedial action following identification of areas of risk | Continuously Ongoing | |
| Support to Maintenance activities as defined in AMP | Continuously Ongoing | |
| Support to project activities as defined in AMP | Continuously Ongoing | |
| Support procurement for new NEUPC asbestos contractor framework | | |
| Audit Northumbria University's Asbestos Management Plan | | Quarterly reviews on-going |

**Appendix 1 - References**

- Health and Safety at Work etc. Act 1974
- Control of Asbestos Regulations 2012,
- The Management of Health and Safety at Work Regulations 1999
- The Control of Substances Hazardous to Health Regulations 2002
- Construction (Design and Management) Regulations 2015 - Management Health and Safety in Construction - L153
- University of Northumbria at Newcastle Asbestos Policy
- Guide to the Control of Asbestos Regulations (CAR2012)
- 'A Comprehensive Guide to Managing Asbestos Premises' - HSG227,
- Managing and Working with Asbestos – Approved Code of Practice L143
- Asbestos Essentials Task Management – HSG210,
- Working with Asbestos in Buildings – INDG289,
- Analyst Guide – HSG248,
- Asbestos the Contractors Guide – HSG247,
- Asbestos. The Survey Guide – HSG264,
- Asbestos Essentials
- Managing for Health and Safety – HSG65,
- Beware Asbestos Web App

## Appendix 2 - Labelling of Asbestos Containing Materials

Labelling of asbestos materials is always regarded as the 'last line of defence' and the absence of an asbestos label should never be taken as an indication that a material does not contain asbestos.

**If an asbestos label is present as shown, it must be assumed that ACMs are present. Conversely, depending on location, the absence of a label does not mean that ACMs are not present. If in doubt, ASK.**


The core strategy of the Asbestos Management Plan is to provide an up-to-date Asbestos Register supported by an effective authorisation to work procedure. This system can be supported by the use of labelling of ACMs in some instances.

The use of local warning signs and labels is beneficial in decreasing the chance of inadvertent damage and exposure. However labelling may not always be considered, particularly where they may cause anxiety to the building occupants.

The labelling of ACMs is considered on a case by case basis by the Asbestos Duty/Deputy Duty Holder. Areas where ACMs will be labelled include:

- Areas only likely to be accessed by maintenance operatives and contractors such as boiler and plant rooms, loft spaces, roofs, ceiling voids and ducts.
- Areas where it is considered that there is a higher than usual risk of the ACM releasing fibres if disturbed such as sprayed materials.
- Areas where it is considered that there is a higher than usual risk of ACMs being disturbed such as lining to columns in a high traffic area.

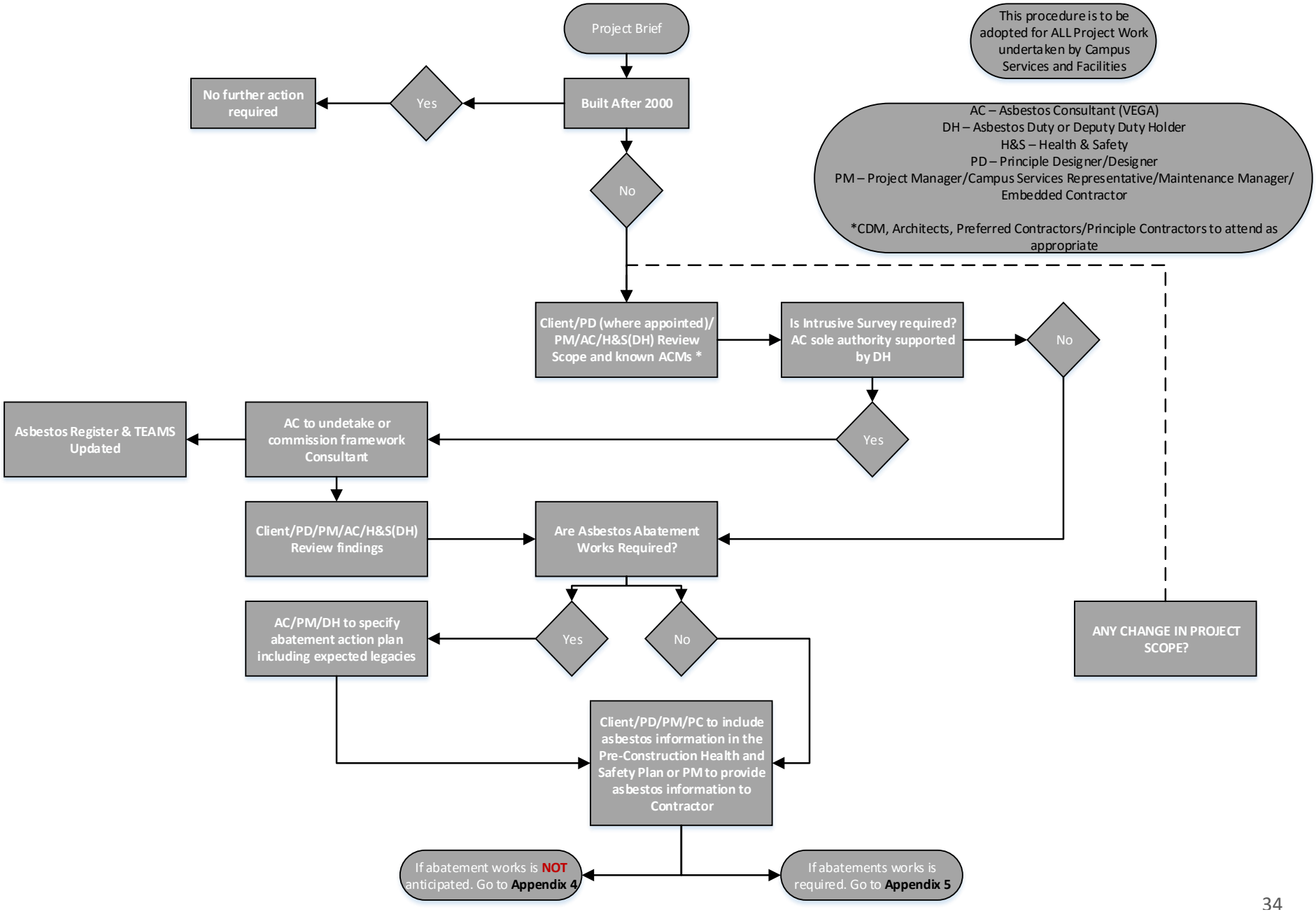
Warning labels or appropriate signage will be carried out to ACMs considered to be a significant risk where this is deemed to:

- Help prevent accidental damage.
- Not cause undue concern.

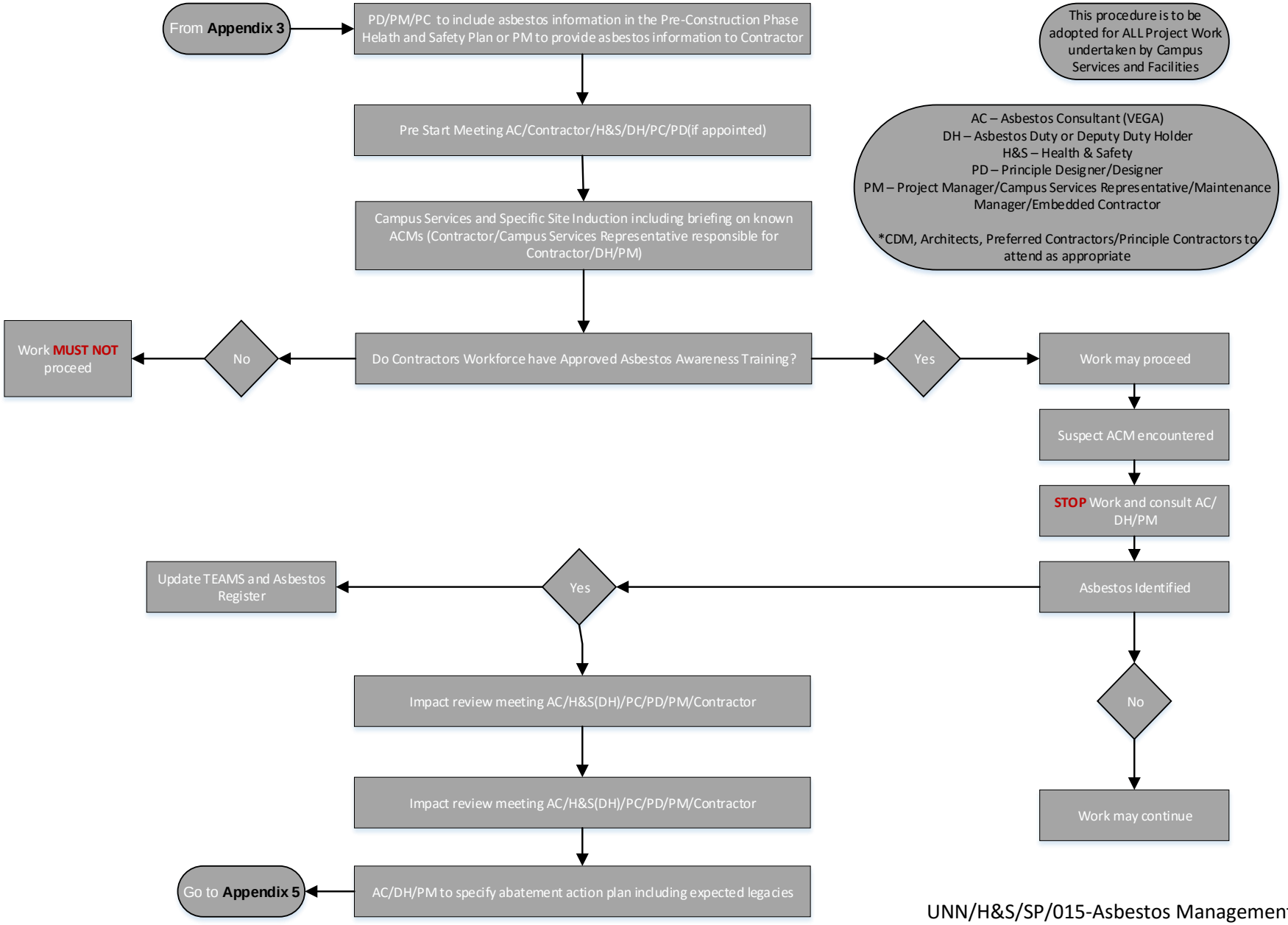
The University protocol is; labels are only used in areas that are not visible or accessible to those other than maintenance contractors e.g. plant rooms, risers, above ceiling grids etc.
Lower risk materials such as floor tiles, textured coatings, cement materials will not be routinely labelled but adequate steps will be undertaken to raise site awareness of their presence e.g. briefings to Building Managers/Area Health and Safety Team.
Historically, some ACMs falling outside the above descriptions have already been labelled within University premises. It is recognised that to remove these labels whilst the ACMs remain is likely to lead to confusion and to the potential accidental disturbance of the material. These will be considered on a case by case basis by the Asbestos Duty/Deputy Duty Holder and removed only where the ACM in question is considered a low risk material, if safe to do so.

The Asbestos Register must still be consulted on every occasion when intrusive work is proposed.

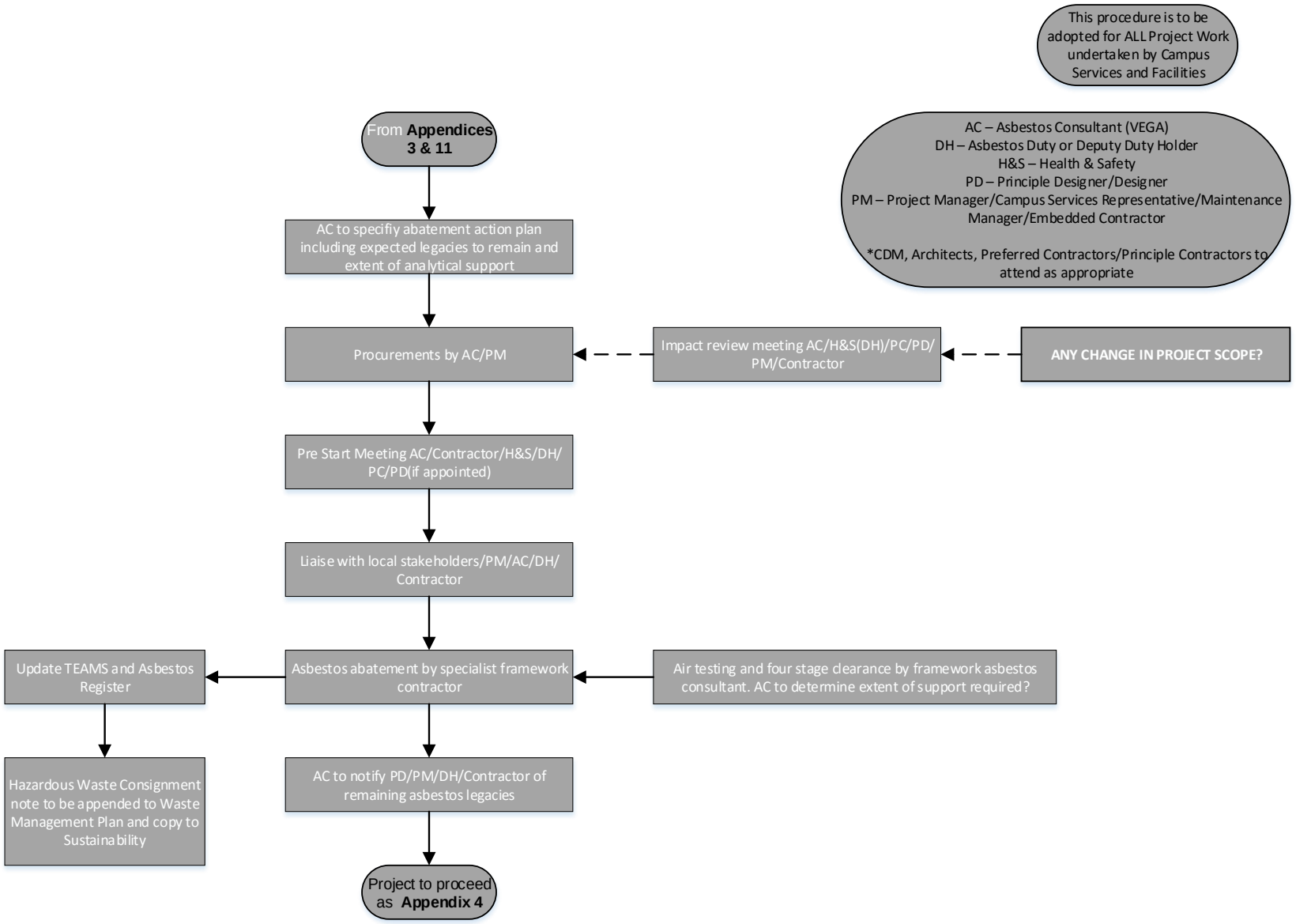
## Appendix 3 – Asbestos Management Plan for Project Works – Pre-Construction Phase



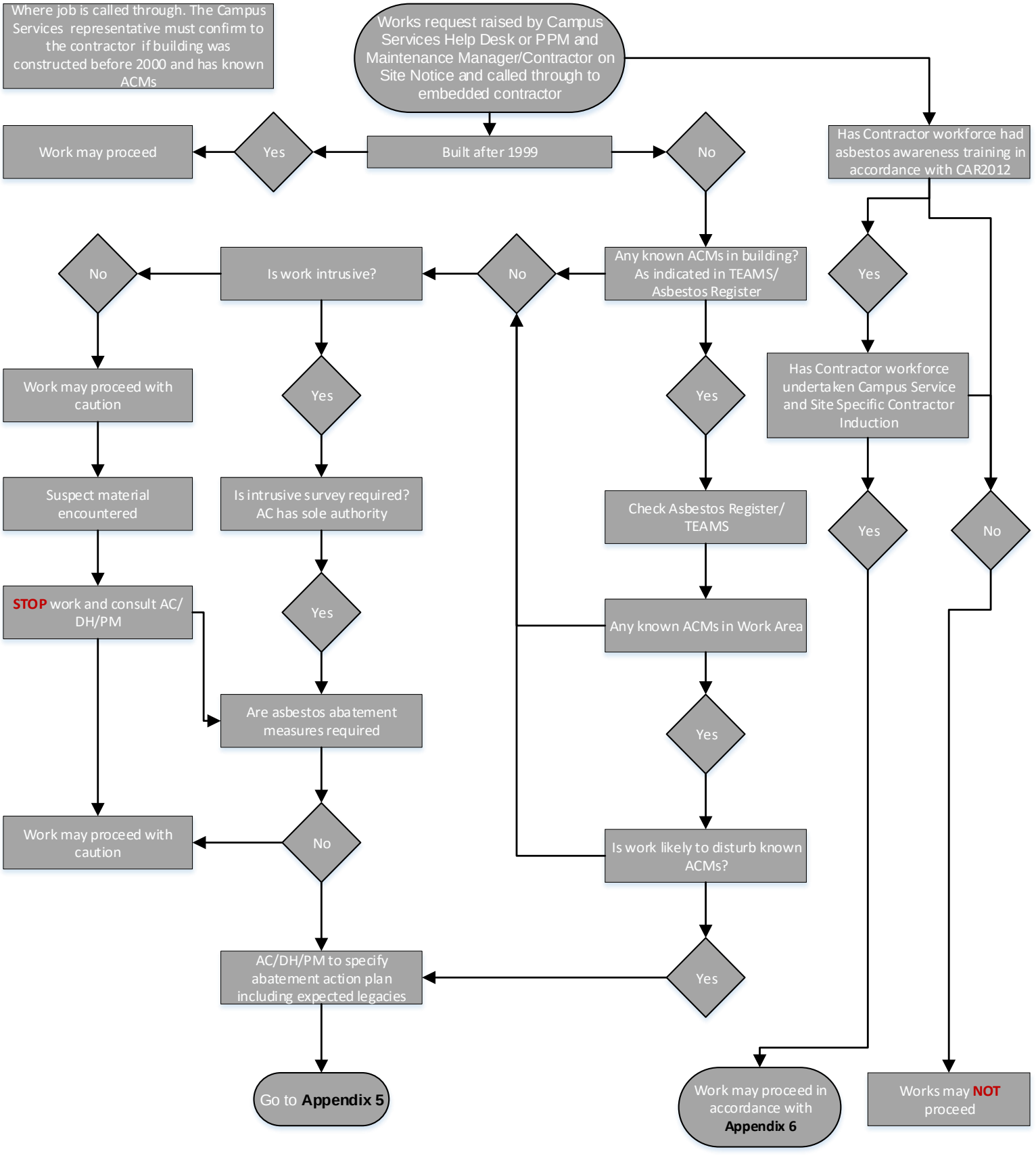
**Appendix 4 – Asbestos Management Plan for Project Works – Construction Phase (Buildings constructed before 2000 where abatement is NOT anticipated**



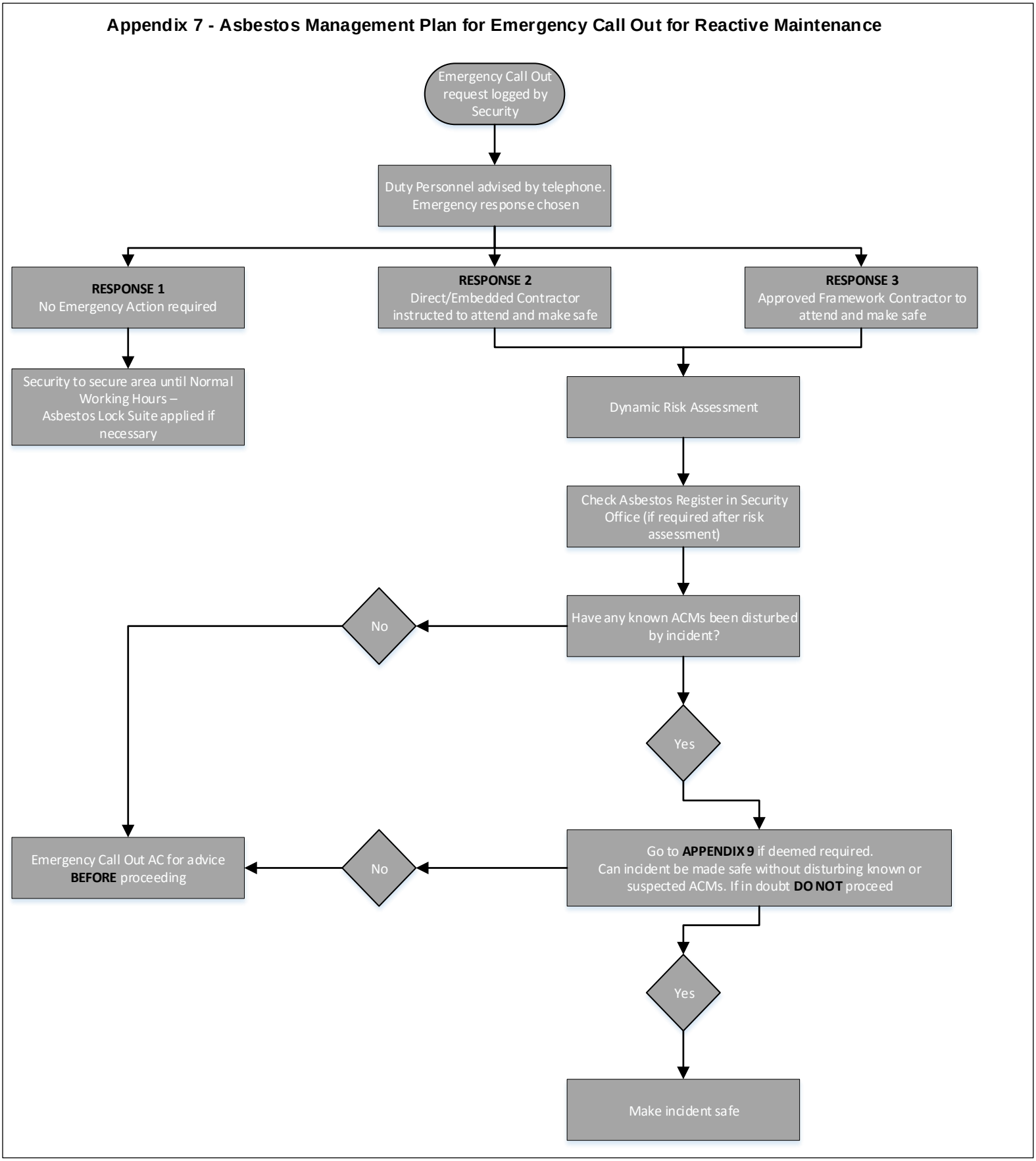
**Appendix 5 – Asbestos Management Plan for Project Works – Construction Phase (Buildings constructed before 2000 where abatement is required)**



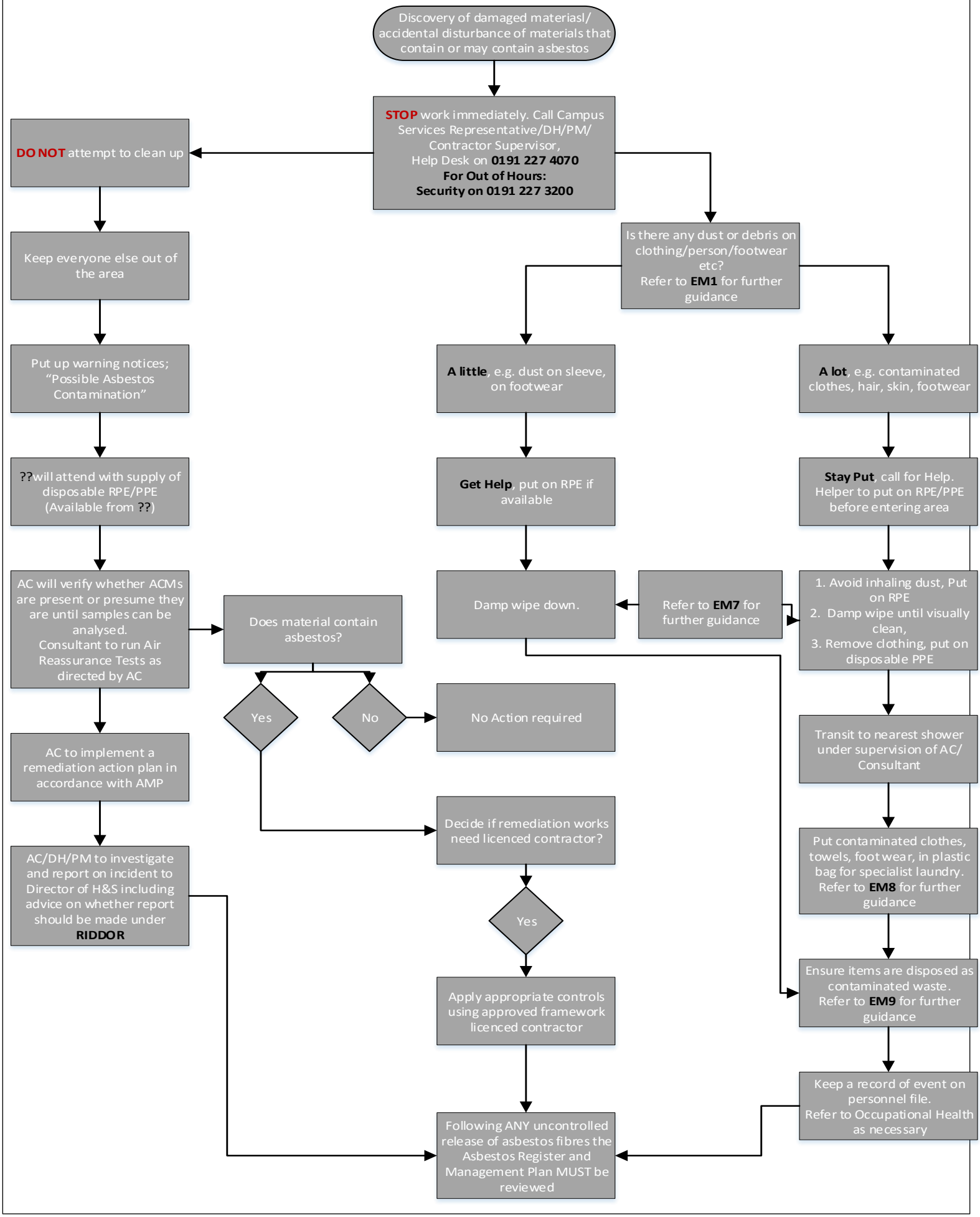
## Appendix 6 - Asbestos Management Plan for Reactive and Planned Preventative Maintenance by Direct & Embedded Contractor/s



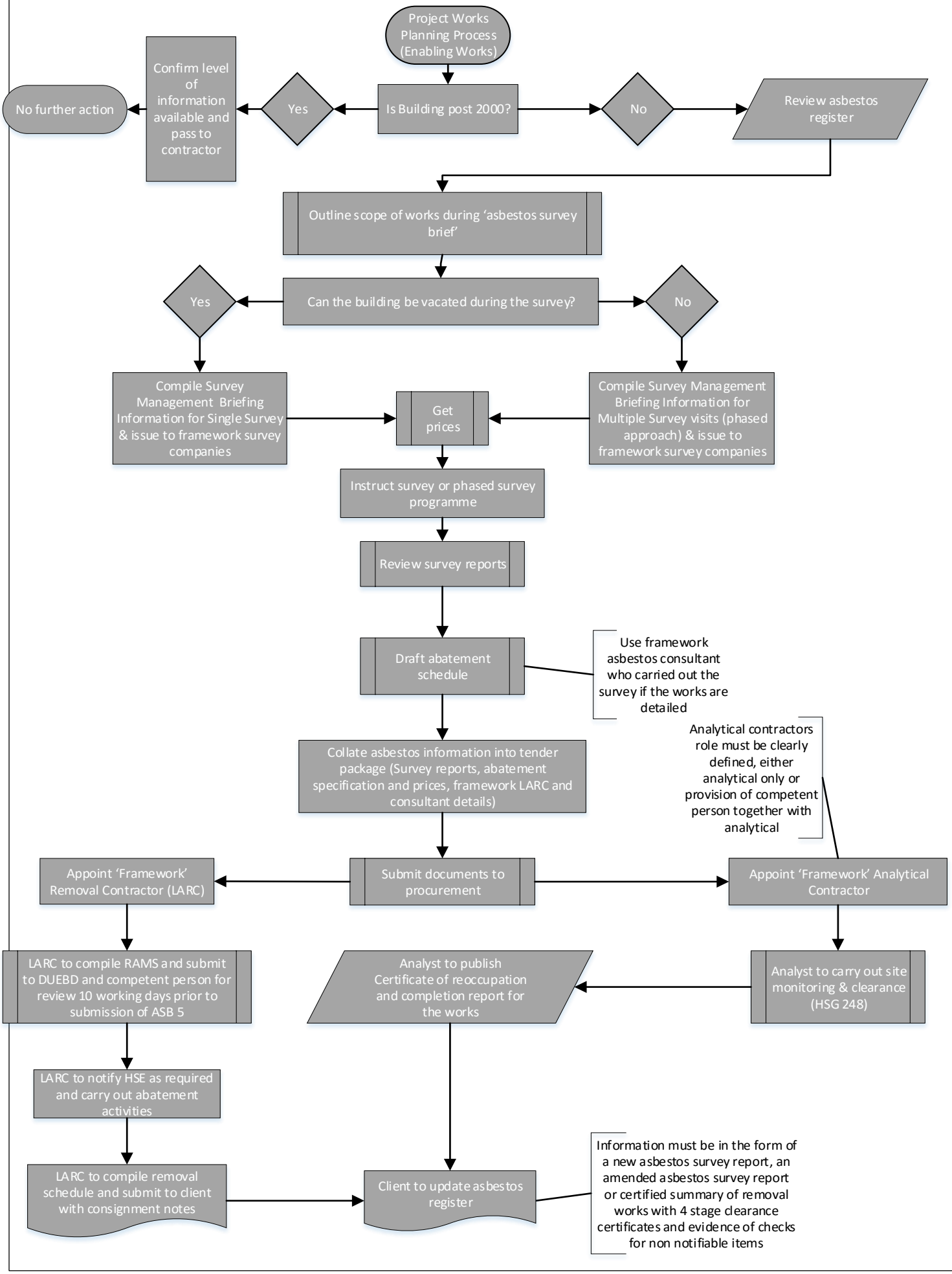
## Appendix 7 - Asbestos Management Plan for Emergency Call Out for Reactive Maintenance



## Appendix 8 - Asbestos Management Plan for Accidental Disturbance of ACM & Suspect Materials



## Appendix 9 – Protocol for Operational and Capital Project Works



# Northumbria University – Pre-Survey Questionnaire

*(This is to be used for all Survey Work)*

| | |
|---|---|
| **Vega Project Manager** | |
| **Date of Survey Request** | |
| **Required Delivery Date of Final Report** | |
| **University Requesting Officer** | |
| **Premises / Building** | |
| **Extent of Survey**<br>If not full – list areas / room numbers (Insert details)<br>*Please be aware that pre-refurbishment surveys may result in significant disturbance and intrusion to boxing, cavities and voids* | |
| **Proposed plans provided?**<br>(Insert the reference for the plan details) | **Y/N** |
| **Scope of work provided?** | **Y/N** |
| **Are survey areas unoccupied?**<br>*If **no**, be aware the surveyor will ask occupants to leave that specific area, especially if sampling and aggressive intrusion is to take place.* | **Y/N** |
| **Will premises be reoccupied on completion or survey work?** | **Y/N** |
| **Specific areas to inspect?** *(walls to be removed / doorways / openings) shown on proposed plans?* | |
| **Any restrictions on survey intrusion?** *(please detail as necessary)* | |
| **Any areas or features which must not be inspected / damaged?** *(please detail)* | |

**Please tick which of the following are to be intrusively examined in the survey:** ***(as applicable)***

| | |
|---|---|
| ☐Partition Walls | ☐Door Frames |
| ☐Suspended Ceiling Panels | ☐Window Sills |
| ☐Boxing | ☐Fire Doors |
| ☐Flooring | ☐Decorative Coving |
| ☐Skirting Boards | ☐Cavity Walls |
| ☐Concrete Floor | ☐Ducting |
| ☐Heaters | ☐Other (please specify) |

| Are inspections to be held in any of the following areas? | | |
|---|---|---|
| **Ceilings and Ceiling Voids >3m** | In order to guarantee access above 3 metres surveyors will need specialist access equipment available on site to ensure access can be made safely. Please confirm that you wish the surveying company to make suitable arrangements and agree that this may result in additional costs incurred. | ☐ |
| **Live Electrics** | In order for surveyors to access electrical installations on site such installations must be isolated. Please confirm that relevant isolation certificates or trained engineers will be available at the time of the survey. | ☐ |
| **Operable Plant & Machinery** | In order for surveyors to access plant on site such installed items must be isolated. Please confirm that relevant isolation certificates or trained engineers will be available at the time of the survey. | ☐ |
| **Gas Installations** (Boilers etc.) | In order for surveyors to access gas installations on site such installed items must be isolated. Please confirm that relevant isolation certificates or trained engineers will be available at the time of the survey. | ☐ |
| **Lift Shafts** | In order for surveyors to access lift shafts on site they must be isolated and safe access provided. Please confirm that relevant isolation certificates or trained engineers will be available at the time of the survey and that you accept that additional access equipment such as harnesses may be required and additional coats may be incurred. | ☐ |
| **Ducts/Voids/ Undercrofts** (Confined Spaces) | In order to guarantee access within confined spaces, surveyors will need specialist access equipment available and trained personnel on site to ensure access can be made safely. Please confirm that you wish the surveying company to make suitable arrangements and agree that this may result in additional costs incurred. | ☐ |
| **Biological/ Chemical Hazard Zones** | Please provide further details of expected hazards including relevant COSHH assessments, risk assessments and control measures in place for these hazardous environments. | ☐ |
| **Poor Lighting** | In order to guarantee access in poorly lit areas surveyors will need temporary lighting available on site to ensure access can be made safely. Please confirm that you wish the surveying company to make suitable arrangements and agree that this may result in additional costs incurred. | ☐ |
| **Areas of Storage** | Please ensure that all areas are free of storage to prevent access limitations in areas to be surveyed. Where this is not possible please confirm that assistance will be provided on site during the survey should such limitations be identified. | ☐ |

| | |
|---|---|
| **Any additional information to assist surveyors?** | |
| **Comments / further information:** | |
| **Survey damage / inspection points to be made safe?** | |
| **University accept responsibility for the level of damage incurred during fully intrusive surveys and for repairs as required** | **Y/N** |