

**Estates and Facilities Directorate
Asbestos Management Policy and Plan - All Campus Sites**

Initial Approval by University Health and Safety Committee 16/05/12

Policy Originator: Helen Pierce

Last Reviewed by: Ben Vallins and Vikki Wood 04/10/17

Review date	Reviewed by	Changes
04/10/2017	B.Vallins / V.Wood	<ul style="list-style-type: none"> 4.0 Table 1.0 Change from Stewart Edwards; Projects and Technical Surveyor to "Ben Vallins; Projects and Technical Surveyor". 4.0 Table 1.0 Change from "Ben Potter; Interim Asbestos Manager" to "John Beaumont: Interim Asbestos Manager" 4.0 Table 1.0 Change from "Gerard Manning; Campus Facilities Manager" to "Steve Hall Campus Facilities Manager" 4.0 Table 1.0 Change from "Joseph Kasprovicz; Campus Facilities Manager" to "Laura MacDonald: Campus Facilities Manager" 4.0 Table 1.0 Changes to contact details table to reflect changes in roles 3.5 and 3.6 Arrangements for storage of asbestos registers updated to reflect current practice.
05/04/2017	VW	<ul style="list-style-type: none"> 4.0 Table 1.0 Added "Adrian Bradish" as additional ILS contact 4.0 Table 1.0 Change from "Richard Cottam; Campus Facilities Manager" to "John Bisbrown: Campus Facilities Manager" 4.0 Table 1.0 Changes to contact details table to reflect changes in roles 4.8 Pluralised to Information and Library Services Contacts to reflect addition of Adrian Bradish 4.4.8 Removal of invalid document reference number for Asbestos Code of Practice
11/10/2016	HP	<ul style="list-style-type: none"> 3.3 Change of wording "All ACMs will be inspected for damage at least annually by the University Project and Technical Building Surveyor" to "All ACMs will be inspected for damage at least annually by the interim Asbestos Manager". 3.4 Change of wording "Asbestos Registers will be updated as required (at least annually) by the Estates and Facilities Directorate Asbestos Management Team" to "Asbestos Registers will be updated as required (at least annually) by the interim Asbestos Manager". 4.0 Table 1.0 Change to "Head of Estates" from "Peter Fotheringham" to "Rob Hartley". 4.0 Table 1.0 Inclusion of "Ben Potter: Interim Asbestos Manager" and the requisite change in responsibilities. 4.0 Table 1.0 Change to Medway Campus "John Bisbrown: Interim Campus Facilities Manager" to "Richard Cottam: Campus Facilities Manager" 4.0 Table 1.0 Change to contact details table to reflect changes in roles. 4.4 Changes in the role of the University Project & Technical Building Surveyor. 4.5 Inclusion of the role of the Interim Asbestos Manager which indicates their responsibility. Renumbering up to 5.0 due to changes in roles. 4.6.1 Addition to the end of the sentence thus "... and the interim Asbestos Manager". 4.6.6 Addition to the end of the sentence thus "... or the interim Asbestos Manager". 5.2 New item which indicates the requisite training of the interim asbestos manager. 5.3 Expanded to include more detail on awareness training and as to whom and when they should attend training. 6.1 Addition of "interim Asbestos Manager" under bullet point headed "Report the problem to the..."
09/12/2015	KR	<ul style="list-style-type: none"> 3.2 Change of wording from "Any intrusive or major works will require a Refurbishment and Demolition survey" to "A demolition and refurbishment survey is needed before any refurbishment or demolition work is carried out. It 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."
05/10/2015	SGE	<ul style="list-style-type: none"> Full review undertaken by SGE. Document re-formatted throughout. Due to Sam Bizzell resigning reference now only made to singular Project and Technical Surveyor (Stewart Edwards). 1.0 Change of wording "is intended as a minimum to deliver compliance" to "to provide a framework for the management of asbestos under..." The reason for this change is that you cannot state that by writing a plan you will deliver compliance. 3.1 Change of wording from "Asbestos Management Surveys will be undertaken on a three yearly cycle and inspection of the condition of known ACM is inspected annually." to "The condition of known ACMs are to be inspected annually. Management surveys are to be undertaken on new acquisitions and as required on other buildings, under the guidance of the appointed responsible person." 3.2 Change of wording from "In 2011 Asbestos First undertook an Asbestos Management Survey of Medway campus and in January 2012 Forest Environmental undertook an Asbestos Management Survey of Avery Hill Mansion and Southwood

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		<p>sites” to “Starting in 2011 and completing in 2014 Asbestos Management Surveys have been undertaken throughout the University Estate.”</p> <ul style="list-style-type: none"> • 3.2 Change of wording from “Any intrusive or major works will require a refurbishment survey” to “Any intrusive or major works will require a Refurbishment and Demolition survey”. • 3.3 Change of wording from “removers” to “removal contractors”. • 3.3 Change of wording from “labelled with the standard red asbestos warning label where possible” to “labelled with the standard red asbestos warning label and / or stencilled warning in line with the agreed labelling protocol”. • 4.1 Change of wording from “Director of Facilities Management” to “the Director of Estates and Facilities Directorate”. • 4.2.5 Omit “Policy and” • 4.4.6 Change of wording from “removed, encapsulated or labelled” to “removed, encapsulated, labelled or stencilled”. • 4.5.4 Change of wording from “that Facilities Management Office staff” to “that Estates and Facilities Directorate office staff”. • 4.8 Change of wording from “that a Refurbishment Survey is undertaken” to “that a Refurbishment and Demolition survey is undertaken”. • Throughout the Document Change of Wording “ACM” to “ACMs” • Inclusion under 4.0 Responsibilities of Table 1.0: Asbestos Lines of Responsibility and Contact Details. • Inclusion under 4.0 Responsibilities of The Head of Estates of the Estates and Facilities Directorate plus their responsibilities listed thereafter. • Inclusion under 4.0 Responsibilities of The Information and Learning Services (ILS) Contact plus their responsibilities listed thereafter.
17/07/2015	HP	Updated links to registers
03/04/2014	SGE & HP	<ul style="list-style-type: none"> • 4.3 (v) Change of wording from “A current asbestos survey and annual condition survey is held for all University buildings that are leased. This should be obtained from the relevant landlord.” to “A current asbestos survey and annual condition survey is held for all University managed property and grounds, where applicable.”
03/04/2014	SGE & HP	<ul style="list-style-type: none"> • 4.4 (ii) Change of wording from “All trade persons and others liable to disturb ACM whether they are directly employed or not, are made aware of the location and condition of ACM; this will be achieved by issuing copies of the Asbestos Register and keeping a record of those it has been issued to” to “All trades persons and others who are liable to disturb ACM on University premises and who are under the governance of the ESTATES AND FACILITIES DIRECTORATE Department whether they are directly employed or not, are made aware of the location and condition of ACM; this will be achieved by allowing access to the relevant Campus’ Asbestos Register.”
03/04/2014	SGE & HP	<ul style="list-style-type: none"> • 4.4 vii) Removal of “Gate House”
03/04/2014	SGE & HP	<ul style="list-style-type: none"> • 4.7/5.3 Change of wording from “Deans of School” to Faculty Operating Officers
030/4/2014	SGE & HP	<ul style="list-style-type: none"> • 4.7 Change of wording from “Are responsible to ensure that staff and contractors under their control undertaking any work to the fabric/surface of a building or within tunnels, voids or service ducts to do so in consultation with Campus ESTATES AND FACILITIES DIRECTORATE who will advise of known asbestos risks in the area. Heads of office and Deans of school must ensure that any staff/contractors that may be at risk of exposure to ACM have the relevant training” to “Are responsible to ensure that staff, consultants and contractors under their control, undertaking any works to the fabric, services to or within a building, tunnels, grounds, voids or service ducts do so in consultation with Campus ESTATES AND FACILITIES DIRECTORATE. This is to ensure that all risks from possible asbestos exposure are mitigated.”
03/04/2014	SGE & HP	<ul style="list-style-type: none"> • 7.0 References delete L127 replace with L143 (2nd Edition)
15/05/2013	SGE & HP H&S Committee	No major changes

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1.0 Purpose

This plan is intended to provide a framework for the management of asbestos under the Control of Asbestos Regulations 2012 (CAR 2012), Regulation 4 – the Duty to Manage Asbestos in Non-Domestic Premises.

2.0 Objectives

- 2.1** To establish a safe system for the management of Asbestos Containing Materials (ACMs), from identification and regular inspection through to maintenance and eventual removal as and when that becomes necessary, together with all record keeping at each stage of the process.
- 2.2** To identify responsibilities of individual university staff for ensuring compliance with CAR 2012, Regulation 4.
- 2.3** To identify information and training requirements for managers, maintenance staff, consultants and contractors to achieve compliance with CAR 2012, Regulation 4.
- 2.4** To remove a proportion of ACMs on an annual basis.

3.0 Surveys and Regular Inspections

- 3.1** The condition of known ACMs are to be inspected annually. Management surveys are to be undertaken on new acquisitions and as required on other buildings, under the guidance of the appointed responsible person.
- 3.2** The University of Greenwich has employed competent surveyors since 2002 to undertake Asbestos Surveys (with additional testing of suspect materials) on all of its premises in accordance with HSE's guidance on asbestos surveys. All existing information was collated in 2007 and an Asbestos Register was created for each campus site. The Asbestos Registers list the individual items of known or suspected ACMs present in each building and detail the exact location, type and condition of material and quantity present. Starting in 2011 and completing in 2014 Asbestos Management Surveys have been undertaken throughout the University Estate. An Asbestos Register is held by the Campus Facilities Manager at each campus. A demolition and refurbishment survey is needed before any refurbishment or demolition work is carried out. It 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.
- 3.3** The University has progressively removed ACMs from premises as and when major refurbishment or demolition has been undertaken the registers have been updated accordingly. All asbestos removal has been carried out by licensed asbestos removal contractors and disposed of in accordance with the Hazardous Waste Regulations 2005. This practice will continue until such time as all ACM have been removed from premises. ACMs considered by the surveyor to be in a sound condition at the time of survey are recorded as such and will be labelled with the standard red asbestos warning label where possible. All ACMs will be inspected for damage at least annually by the interim Asbestos Manager or an Approved Asbestos Surveyor. If asbestos is damaged or debris is found, licensed asbestos removers will be engaged to

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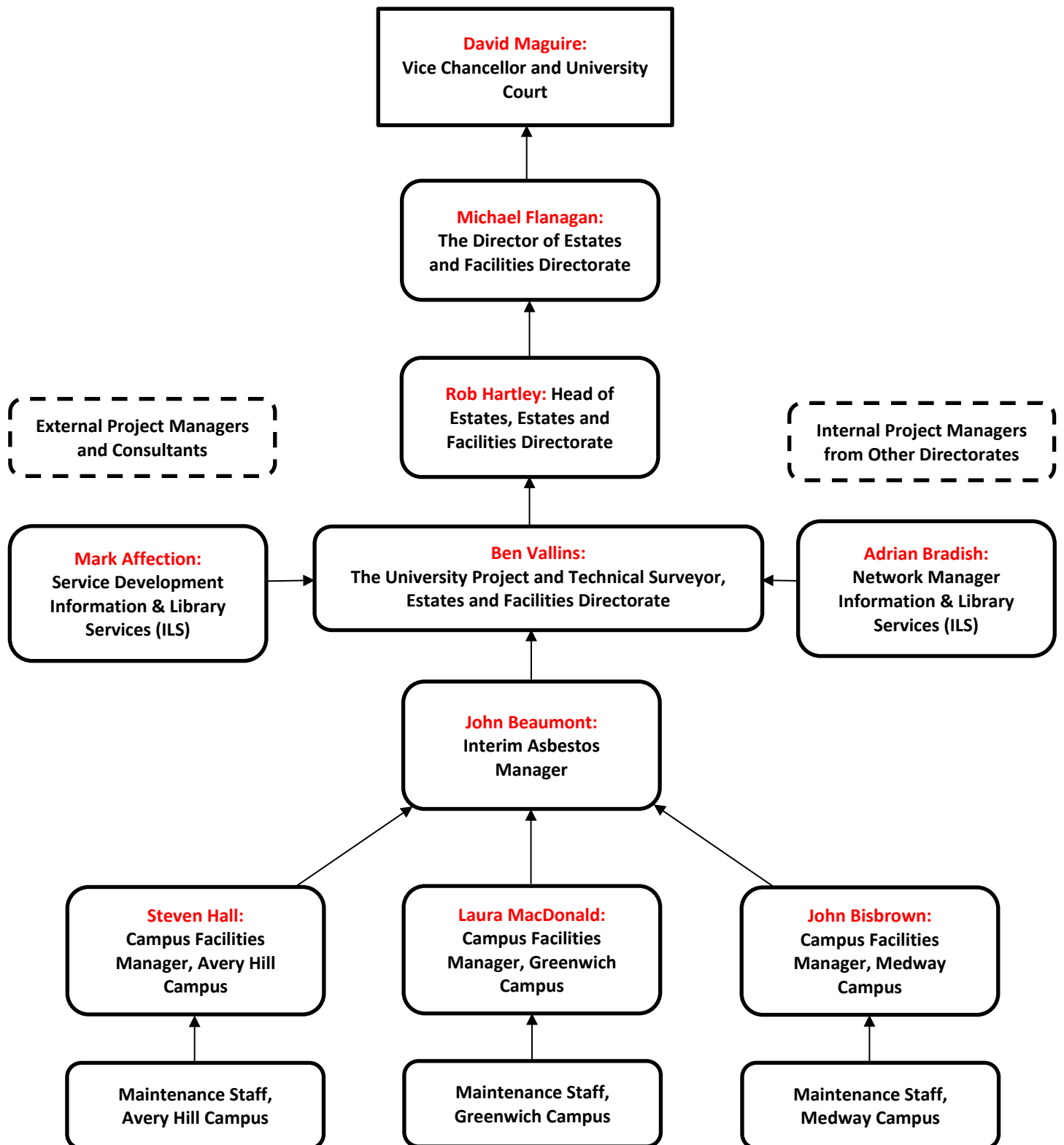
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remove or encapsulate the material and clean the area involved. Air clearance checks will be undertaken following the works.

- 3.4 Asbestos Registers will be updated as required (at least annually) by the interim Asbestos Manager. Following the reviews, the registers will be made available to the Campus Managers on-line, via the Estates and Facilities Directorate shared drive.
- 3.5 Master copies of the Asbestos Registers are kept on the Estates and Facilities Directorate shared drive and made available on the **University Portal** [Click here](#)
- 3.6 Hard copy Asbestos Registers are held at each campus site in the Campus Facilities Manager's office and are available for inspection by contractors, prior to carrying out any works, or other interested parties. Copies are also kept in the Security Gatehouse for inspection by emergency services.
- 3.7 Limitations - Limited information is currently available on the following:-
 - 3.7.1 Any asbestos materials that may be associated with underground services including drainage and mains electricity, such as asbestos cement (AC) or redundant heating services such as asbestos insulation (AI): probability of this is low; risk of asbestos exposure if AC present is low, but risk of exposure high if AI is present.
 - 3.7.2 Any asbestos waste that may be present in any made-up ground beneath or around the building: probability of this is very low, and risk if present depends on whether the material is AC or AI – see 3.7.1 above.
 - 3.7.3 Any redundant pipe services that may be concealed within the structure of pre-1980 buildings, such as might be insulated with AI: probability of this is low, but risk if present is high.
 - 3.7.4 Any flues, soil pipes or similar concealed within the structure that might be of asbestos cement: probability of this is low, and risk if present is low.
 - 3.7.5 Any bonded gaskets within heating or hot service pipe work or vessels that might contain asbestos: probability is high, but risk if present is low.
 - 3.7.6 Any asbestos components within electrical distribution boards, such as asbestos rope flash guards to fuse carriers: probability is high, but risk if present is low.

4.0 Responsibilities

Table 1.0: Asbestos Lines of Responsibility and Contact Details



In the case that any post mentioned in this document becomes vacant, the immediate Line Manager will assume responsibilities made under this Policy

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CONTACT DETAILS		
NAME	TELEPHONE NUMBER	EMAIL ADDRESS
David Maguire	(020) 8331 8880	D.Maguire@gre.ac.uk
Michael Flanagan	(020) 8331 8118	M.Flanagan@gre.ac.uk
Rob Hartley	(020) 8331 8866	R.J.Hartley@gre.ac.uk
Ben Vallins	(020) 8331 8793	B.S.Vallins@gre.ac.uk
Mark Affection	(020) 8331 9191	M.Affection@gre.ac.uk
Adrian Bradish	(020) 8331 8319	A.Bradish@gre.ac.uk
John Beaumont	(020) 8331 7983	J.W.Beaumont@gre.ac.uk
Steve Hall	(020) 8331 9638	S.R.Hall@gre.ac.uk
Laura MacDonald	(020) 8331 7703	L.J.MacDonald@gre.ac.uk
John Bisbrown	(020) 8331 3851	A.J.K.Bisbrown@gre.ac.uk

- 4.1 The Court** is responsible for ensuring that the University provides a safe environment for all of its staff, students and visitors. This includes the potential health risk posed by asbestos on its premises. The Court is responsible for ensuring that the Director of the Estates and Facilities Directorate is provided with sufficient resources to develop and implement an adequate Asbestos Management Plan (AMP).
- 4.2 The Director of the Estates and Facilities Directorate** is responsible for the provision and maintenance of safe services and buildings, including the management of asbestos in University premises. The Director is responsible for developing and implementing an Asbestos Management Plan (AMP) that complies with all current regulations and all HSE Approved Codes of Practice and guidance, and specifically for ensuring that:-
- 4.2.1 All relevant Estates and Facilities Directorate staff, consultants and contractors are made aware of the AMP and the roles and responsibilities that it places on them.
 - 4.2.2 All relevant Estates and Facilities Directorate staff, consultants and contractors have received suitable and sufficient information, instruction and training on asbestos to enable them to fulfil their roles and responsibilities.
 - 4.2.3 Suitably qualified and competent UKAS accredited surveyors / laboratories and HSE licensed asbestos removal contractors are selected to deliver the services required for implementation of the University's AMP, asbestos surveys, testing of materials, periodic inspection of ACM in-situ maintenance, repair, encapsulation and removal of ACM independent inspection, testing and certification of removal works.
 - 4.2.4 Performance criteria are established for delivery of the above services to meet the standards required for regulatory compliance as a minimum.
 - 4.2.5 The Asbestos Management Plan is reviewed on an annual basis at the Estates and Facilities Directorate Health and Safety meeting.

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- 4.3 The Head of Estates of the Estates and Facilities Directorate** is responsible for ensuring that:-
- 4.3.1 Periodic (annual) reviews of the contractors' performance in relation to these services.
 - 4.3.2 Any new additions to the University's estate are subject to an Asbestos Management Survey and the results placed on the Asbestos Register; in the event of sale or lease of University premises, copies of site specific asbestos surveys and removal records and the Asbestos Register are supplied to the party in control of the premises.
 - 4.3.3 Prior to any refurbishment or demolition works a fully invasive 'Refurbishment and Demolition' survey for asbestos is carried out by a UKAS accredited asbestos surveyor.
- 4.4 The University Project and Technical Surveyor** (Estates and Facilities Directorate Asbestos Management Team) is responsible for ensuring that:-
- 4.4.1 There is an approved list of Asbestos Contractors to undertake works and surveys on University buildings.
 - 4.4.2 There is liaison with the Asbestos Manager to ensure that he / she has all of the means available to undertake their role.
 - 4.4.3 To monitor the performance of the Asbestos Manager and report accordingly.
 - 4.4.4 There is continued liaison ILS with regards to their project work and any guidance required with regards to asbestos.
- 4.5 The Interim Asbestos Manager** is responsible for ensuring that:-
- 4.5.1 Any contractor engaged to work with / remove ACM submits a suitable and sufficient risk assessment and plan of work (or method statement) for approval prior to commencement of work. The plan of work must address the isolation of the work area, the maintenance of existing fire escape routes or provision of alternatives, the contractors access and waste / personnel transit routes, the arrangements for temporary storage and disposal of waste, which must be in accordance with the Hazardous Waste Regulations 2005. The plan of works must include air clearance checks following the works.
 - 4.5.2 All ACM is inspected at regular intervals (at least annually) and that its condition is recorded.
 - 4.5.3 Any materials that are suspected of containing asbestos are sampled in accordance with HSG 264 and analysed by a UKAS accredited laboratory to verify any asbestos content prior to any works being carried out on them or in the vicinity.
 - 4.5.4 A current asbestos survey and annual condition survey is held for all University managed property and grounds, where applicable.
 - 4.5.5 Any newly discovered ACM are recorded in the relevant Register and removed, encapsulated, labelled or stencilled.
 - 4.5.6 The Asbestos Registers are promptly updated on-line on the Estates and Facilities Directorate shared drive and changes notified to the Campus Managers.

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4.5.7 To provide annual asbestos awareness training to all members of staff as per item N^o. 5.3 below.

4.6 The Campus Facilities Managers are responsible for ensuring that:-

4.6.1 All works on ACM are to be arranged in consultation with and subject to the advice of the Estates and Facilities Directorate Asbestos Management Team and the interim Asbestos Manager.

4.6.2 All trades persons and others who are liable to disturb ACMs on University premises and who are under the governance of the Estates and Facilities Directorate whether they are directly employed or not, are made aware of the location and condition of any ACMs; this will be achieved by allowing access to the relevant Campus' Asbestos Register.

4.6.3 All relevant Estates and Facilities Directorate staff, contractors and consultants are aware of the Estates and Facilities Directorate Local Code of Practice (097/GEN/01) to be referred to prior to working with or near an ACM and aware of the Estates and Facilities Directorate Asbestos discovery emergency procedures.

4.6.4 The Estates and Facilities Directorate Local Code of Practice (097/GEN/01) to be referred to prior to work with or near asbestos containing materials are to be kept updated and brought to the attention of all Campus Facilities Managers, Maintenance Supervisors and Maintenance staff. This Code gives information and instruction regarding precautions to be taken to ensure that Estates and Facilities Directorate office staff, contractors / subcontractors and consultants are aware of the whereabouts of ACMs, or suspected ACMs, prior to starting any work that may disturb such materials. No University staff may carry out any work on ACMs. Only specialist, licensed contractors may work with asbestos containing materials

4.6.5 Any materials suspected of containing asbestos are sampled in accordance with HSG 264 and analysed by a UKAS accredited laboratory to verify asbestos content prior to any works being carried out on them or in the vicinity.

4.6.6 Any newly discovered or suspected ACMs are referred to the Project and Technical Building Surveyor or the interim Asbestos Manager.

4.6.7 The hard copies of the Asbestos Registers held in the Local Campus Estates and Facilities Directorate office are kept up-to-date and available to anyone.

4.6.8 All retained ACMs are kept in a good condition; if damage is discovered, the area is to be cordoned-off until specialist asbestos removers can be engaged to repair or remove the ACM and any associated dust / debris.

4.7 The Maintenance Staff are responsible for following instructions provided by their employer for their health and safety. They are to adopt a precautionary approach to the possible presence of ACMs i.e. in the event suspect material is encountered, they are to stop work immediately and report it to the Campus Facilities Manager who will arrange for any necessary sampling and testing by a UKAS accredited laboratory. All maintenance staff must be trained in the Asbestos Discovery Emergency Procedure (see 6 below.)

- 4.8 The Information and Learning Services (ILS) Contacts** are responsible for ensuring that:-
- 4.8.1 The Estates and Facilities Directorate Asbestos Management Team are made aware of any ILS related projects which requires an R&D Survey.
 - 4.8.2 Any contractor engaged by ILS submits a suitable and sufficient risk assessment and method statement for approval prior to commencement of work. This must consider asbestos if and when required.
 - 4.8.3 All trades persons and others who are liable to disturb ACMs on University premises and who are under the governance of ILS, whether they are directly employed or not, are made aware of the location and condition of any ACMs; this will be achieved by allowing access to the relevant Campus' Asbestos Register and close liaison with the Campus Facilities Manager.
 - 4.8.4 All relevant ILS staff, contractors and consultants are aware of the Asbestos Code of Practice, to be referred to prior to working with or near an ACM, and aware of the Estates and Facilities Directorate Asbestos discovery emergency procedures.
 - 4.8.5 Any newly discovered or suspected ACMs are referred to the Project and Technical Building Surveyor.
- 4.9 The Project Managers and Consultants** engaged in major alteration, refurbishment or redevelopment projects are responsible for ensuring that a Refurbishment and Demolition surveys are undertaken in consultation with the University Project and Technical Surveyor
- 4.10 Pro Vice-Chancellors, Faculty Operating Officers, Directors of Office** are responsible to ensure that staff, consultants and contractors under their control, undertaking any works to the fabric, services to or within a building, tunnels, grounds, voids or service ducts, do so in consultation with Campus Estates and Facilities Directorate. This is to ensure that all risks from possible asbestos exposure are mitigated.

5.0 Information, Instruction and Training

- 5.1** The University Project and Technical Surveyor is trained in Management of Asbestos in Buildings certified to P405 standard in March 2011.
- 5.2** The interim Asbestos Manager is trained to BOHS - P402 (Mar 2014), P403 (Dec 2013), P404 (Dec 2013) and W504 (June 2014).
- 5.3** Managers and Maintenance Supervisors have received training in relation to the Duty to Manage Asbestos. This will be subject to three yearly refresher training. Estates & Facilities Directorate employees, other maintenance staff and those employed by ILS, who may be exposed to asbestos during the course of their work, are to have asbestos awareness training in accordance with the Control of Asbestos Regulations 2012. This training will be refreshed on an annual basis. Any new employee within the Estates and Facilities Directorate to whom this policy is relevant will receive such training as soon as is reasonably practicable after the commencement of their employ.

- 5.3 Other Pro Vice-Chancellors, Faculty Operating Officers, Directors of Office** that have persons within their department that may be at risk of exposure to ACMs must contact the Safety Unit who will advise of appropriate training.
- 5.4** All external consultants and contractors are required to supply evidence of adequate and appropriate information, instruction and training of their employees with regard to ACMs.

6.0 Asbestos Discovery Emergency Procedures

- 6.1** On discovery of an ACM in a damaged / poor condition or material suspected to be an ACM during work activity the following procedures will need to be followed:
- On discovery of a damaged ACM or on damaging an ACM, stop work immediately.
 - If the ACM / suspected ACM is in a bad condition, keep all other persons out of the work area / room.
 - If there is dust or debris on clothing carefully remove the clothing and put in a plastic bag.
 - Wash thoroughly by using the nearest facility or if available take a shower.
 - Leave the washing facility clean.
 - Report the problem to the relevant Campus Manager / Deputy, interim Asbestos Manager or University Project and Technical Building Surveyor immediately.
 - Put up warning signage stating 'possible asbestos contamination'

7.0 References

- 7.1** The Asbestos Management Plan has been written based on information and guidance provided by the HSE in:-
- The Control of Asbestos Regulations 2012.
 - HSG 264: Asbestos: The Survey Guide.
 - Managing and Working with Asbestos: Approved Code of Practice L143 (2nd Edition) Control of Asbestos Regulations 2006.
 - Asbestos: The analysts' guide for sampling, analysis and clearance procedures: HSE Guidance Note HSG 248.
 - Asbestos: The licensed contractors' guide: HSE Guidance Note HSG 247.
 - Asbestos Essentials: A task manual for buildings, maintenance and allied trades on non-licensed asbestos work: HSE Guidance Note HSG 210.
 - Site specific asbestos surveys carried out by competent surveyors.