



University of Brighton

Departmental asbestos management plan

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July 2016

1.0 Document Control Information

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<i>The latest approved version of this document supersedes all other versions. Upon receipt of the latest approved versions all other versions should be destroyed, unless specifically stated that the previous version(s) are to remain extant. If in any doubt please contact the document author.</i>	

Change Control

Name	Changes made	Date
UNIV/BRIG/H5567/001	Initial Management Plan for comment	10/05/2004
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EFM/EU	Significant revision, inclusion of roles & responsibilities, asbestos officer	25/07/2016

Related Documents

Document	Author	Version	Date
Code of Practice on Asbestos Containing Materials (ACMs) for Schools and Departments	Alan Cowen / Andrew Knight	Not noted.	Dec. 2006
University Asbestos Management Policy	Alan Cowen / Andrew Knight	Policy due – being developed by H&S Department	TBA
University Contractor/Visitor Management Policy	Alan Cowen / Andrew Knight	Policy due – being developed by H&S Department	TBA
EFM Health & Safety Policy	Edwin Underwood	V1.01	10/12/2015

Policy Awareness

People who need to know this management plan in detail	Directors and Managers in the EFM Department, building surveyors, project officers, site managers. Asbestos manager and asbestos officer.
People who need to have a broad understanding of this management plan	EFM site supervisors, technical staff, caretakers
People who need to know that this management plan exists	Vice Chancellor's Office, Chief Operating Officer, Union Representatives

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Important Information about your Departmental Asbestos Management Plan

This Departmental Asbestos Management Plan is a binding legal document.

It is made publically available so that our service providers and contractors are made aware as to how the Estate & Facilities Management Department (EFM) manages asbestos containing materials.

If you need help understanding the requirements of this document contact:

University of Brighton Asbestos Manager:

Edwin Underwood on:

01273 641449

07970906467

or

University of Brighton alternative contact:

Tony Rodriguez

Assistant Director of Estate & Facilities Management

01273 643138



Labelling of asbestos containing materials (ACM)

The University of Brighton does not generally label ACM and no person should ever rely on ACM being labelled. In all circumstances information as to the type, location and risk rating of ACM should be obtained from the Contractors Asbestos Reports. If in doubt, stop work and seek professional assistance. If your work is likely to bring you into contact with ACM then you must have undergone adequate asbestos awareness training.

SECTION 1: INTRODUCTION

1.1 Relevant Legislation for the Management of Asbestos

- The Control of Asbestos Regulations 2012 (Asbestos Regulations, 2012 SI No,632)
- Managing and Working with Asbestos, Control of Asbestos Regulations 2012, Approved Code of Practice and Guidance, L143 (Second Edition, published 2013, HSE)
- HSG 264 Asbestos the survey guide, (Second Edition, published 2012, HSE)
- HSG 248 Asbestos: The analysts' guide for sampling, analysis and clearance procedures, (2005, HSE)

1.2 Schedule of Abbreviations & Acronyms

- ACM –Asbestos containing materials
- ACoP – Approved code of practice (official UK code of practice with legal status)
- AIB – Asbestos insulating board
- ASB - Asbestos
- CAR'12 - The Control of Asbestos Regulations 2012
- EFM – Department of Estate and Facilities Management
- CoP – Code of practice (University of Brighton document)

1.3 Your EFM Asbestos Management Plan

This EFM Asbestos Management Plan has been designed with the sole purpose of managing the risk from Asbestos Containing Materials (ACMs) identified within areas under the control of the Department for Estate and Facilities Management (EFM Department) of the University of Brighton (UoB).

It has been developed so that as far as reasonably practicable no one can come to any harm from those ACMs on the premises. It is an integral part of the University's strategy for compliance of all current Health and Safety legislation regarding asbestos.

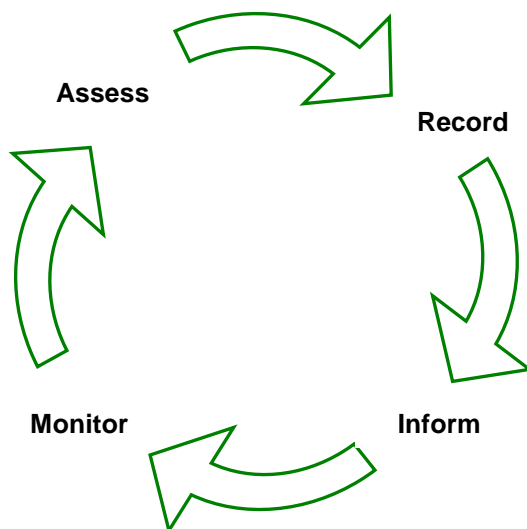
The EFM Department is not responsible for managing asbestos containing materials that are within or associated with equipment and machinery that is controlled or managed by other university departments, colleges or schools.

The EFM Department is solely responsible for asbestos containing material that is associated with the fabric of buildings and the machinery and equipment utilised for the functioning of those buildings such as boilers, electrical switch boards and generators.

This EFM Asbestos Management Plan should be read in conjunction with the University of Brighton's Code of Practice on Asbestos Containing Materials (ACMs) for Schools and Departments, which is owned by the Department for Occupational Health and Safety Services.

1.4 Principles of Asbestos Management

The main principles of asbestos management are to Assess, Record, Inform and Monitor.



1.4.1 Assess

Asbestos in premises does not necessarily create an unacceptable risk. Asbestos is the hazard; the risk can only be defined when this hazard is assessed within the environment in which it is found. This assessment must take into account the activities carried out near or on the asbestos for the assessment to be able to present viable recommendations. It may take the form of a desk-top study, a full asbestos survey, or a combination of the two.

1.4.2 Record

All assessments, the location and the condition of any known or presumed asbestos containing materials must be recorded, updated and regularly reviewed. Similarly, any changes to the condition or location of any known or suspected ACMs, any training, any controlled removal works, re-inspections, etc., must be recorded. It is imperative that all asbestos records are kept up to date, are coherent and are accessible on a need to know basis.

1.4.3 Inform

All Asbestos records gathered must be made available in a meaningful context to all relevant people within reasonable time. Staff, contracted workers, regular building users, managers, etc. may require access to asbestos records held by the EFM Department. Additionally, a system of training, seminars, question and answer sessions, as well as site inductions and risk assessments should be adopted where appropriate.

1.4.4 Monitor

Asbestos records, procedures, training and safe systems of works must be regularly monitored and reviewed; this is an Approved Code of Practice (ACoP) requirement. The purpose of this ongoing monitoring is to ensure that the aims of the asbestos management strategy are being met and that no one is being exposed to asbestos.

SECTION 2: DUTIES AND RESPONSIBILITIES

2.1 Duty Holder

The bulk of asbestos containing materials is under the control of the Department of Estate and Facilities Management whose Director reports to the Chief Operating Officer. They in turn report to the office of the Vice Chancellor.

However, some asbestos containing material is under the control of University Heads of Colleges or Schools who report directly to the office of the Vice Chancellor.

For the purpose of ensuring that adequate resources are made available and a suitable standard of governance and operational practice is in effect the Vice Chancellor of the University of Brighton is designated as "Duty Holder" subject to Regulation 4 of The Control of Asbestos Regulations 2012.

All other employees of the University of Brighton are duty-bound under Section 7 of The Health and Safety at Work Etc. Act 1974 to cooperate with the Duty Holder.

2.2 Director of Occupational Safety & Health Services

The Director of Occupational Safety & Health Services is the owner of the university Asbestos Policy and as such is responsible for advising the Duty Holder of their role, responsibility and liability. They are also responsible for the periodic auditing of compliance across the University and as such must ensure that from time to time the management of asbestos across the entire university is subject to an appropriate standard of audit. Reports are submitted to the Safety Committee.

2.3 Responsible Persons – Department for Estate & Facilities Management

The following post holders within the Department for Estate & Facilities Management have assigned director or management responsibility for the purpose of assuring compliance with CAR'12 and in support of the Duty Holder.

2.3.1 Director of Estate & Facilities Management

Currently Mike Clark.

Responsibility for the management of ACM within the fabric and structure of university buildings and associated equipment lies with the Department for Estate and Facilities Management, through its director who is responsible for the allocation of resources, governance and overall compliance within the Department for Estate & Facilities Management. He must also ensure that his staff and appointed contractors have, where necessary, undertaken adequate asbestos awareness training.

2.3.2 Deputy Director of Estate & Facilities Management

Currently Neil Humphreys

Being responsible for 'capital' building works (major refurbishments and new build) he is responsible for ensuring that he and Project Managers under his remit consult with the Asbestos Manager concerning major refurbishment of buildings that may contain asbestos and ensuring that when necessary asbestos refurbishment surveys are undertaken, remediation works under his control are appropriately managed and all associated documentation is handed to the Asbestos Manager in good time. He must also ensure that his staff and appointed contractors have undertaken adequate asbestos awareness training within the past five years.

2.3.3 Assistant Director of Estate & Facilities Management (Technical)

Currently Tony Rodriguez.

Specific responsibility and lead role on behalf of the department in the management of ACM for which the department has responsibility. As the manager of the department's Technical Team, he has responsibility for a group of professional and technical staff who maintain the university estate and hence are most likely to need to disturb ACM in the process of their work. Additionally, this group of staff have responsibilities for ensuring that ACM are maintained in good condition, arranging necessary remedial works and where required, removal of ACM. He must also ensure that his staff and appointed contractors have undertaken adequate asbestos awareness training within the past five years.

2.3.4 Assistant Director of Estate & Facilities Management (Facilities Services)

Currently Gideon Meade

Responsible for the day to day upkeep of the premises through the provision of caretaker, cleaning, CCTV, access control, security, transport and logistics services. The caretakers are crucial to facilitating the control of contractors on the premises and are normally the first point of contact for contractors when they arrive on campus.

He must also ensure that his senior staff and appointed contractors have, where necessary, undertaken adequate asbestos awareness training within the past five years.

2.3.5 Department Safety Advisor & Asbestos Manager

Currently Edwin Underwood.

The designated Asbestos Manager for the University of Brighton shall;

1. Be accountable for the management of asbestos that falls under the control of the EFM Department.
2. Ensure that the Asbestos Officer is appropriately supported and adequately performs their duties.
3. Ensure, so far as is reasonably practicable, that this management plan is implemented, updated when necessary and the manner in which asbestos is managed by the EFM Department is compliant.

2.3.6 Asbestos Officer

Currently Tom Draisey

The Asbestos Officer has the following responsibility:

1. To manage and develop the University's asbestos register in a pragmatic and concise manner, ensuring that asbestos information is made available in a discernible format, in a timely manner to all parties who require it.
2. Assist in the management and updating of policies, procedures and safe working practices, so to ensure that the University meets its statutory obligations in respect of asbestos management.
3. To produce detailed specification/tender documentation and all other associated paper work as may be required in association with surveying and abatement projects, incorporating the review of quotations/tender returns.
4. To manage asbestos surveying and abatement works.

5. To undertake ad-hoc asbestos surveying and the re-inspection of known asbestos assets subject to their risk profile and management priority ranking.
6. Promote high standards of effective asbestos management and awareness.
7. Deputise for the Asbestos Manager in their absence.

2.3.7 Senior Surveyor (Technical Team)

Currently Andy Christmas

Responsible for ensuring that he and the Project Officers (surveyors) under his remit consult with the Asbestos Manager concerning minor building works and ensure that when necessary asbestos refurbishment surveys are undertaken, remediation works under his control are appropriately managed and all associated documentation is handed to the Asbestos Manager is good time. He must also ensure that his staff and appointed contractors have undertaken adequate asbestos awareness training within the past five years.

2.3.8 Building Services Engineer (Technical Team)

Currently Neil Troak

Responsible for ensuring that he and the engineers and contractors under his remit and control consult with the Asbestos Manager concerning decommissioning and installation of building services plant and equipment and ensure that when necessary asbestos refurbishment surveys are undertaken, remediation works under his control are appropriately managed and all associated documentation is handed to the Asbestos Manager is good time. He must also ensure that his staff and appointed contractors have undertaken adequate asbestos awareness training within the past five years.

2.3.9 Maintenance Manager (Technical Team)

Currently Robert Miller

Responsible for the day to day minor repairs (fabric, carpentry, plumbing and electrical) and grounds maintenance and contractors appointed to assist with the upkeep of the premises. Responsible for ensuring that he and the operatives and contractors under his remit and control review the Contractors Asbestos Reports and when necessary consult with the Asbestos Manager concerning potential work with ACM. He must ensure that his staff and contractors do not damage ACM and must consult with the Asbestos Manager should any ACM require remediation or removal. He must also ensure that his staff and appointed contractors have undertaken adequate asbestos awareness training within the past five years.

2.3.10 Systems Manager, Estate & Facilities Management

Currently Holden Wood

Responsible for the management of the departments' electronic systems which includes the PlanOn CAFM system and the PlanOn Asbestos Management Module.

The management of asbestos data and the production of necessary reports and issue of subsequent asbestos information to staff, contractors and other such parties is dependent on the development and functioning of the PlanOn Asbestos Management module.

The systems manager has responsibility for overseeing the uploading and management of data in the PlanOn system.

2.3.11 Space Manager, Estate & Facilities Management

Currently Maureen Cherry.

The configuration of buildings changes from time to time, requiring that space codes and room references in the PlanOn system are updated. The asbestos data is linked to the space coding in the system and as such revised and new data cannot be uploaded unless space coding is up to date.

Therefore the Space Manager is responsible for ensuring that changes within buildings are updated in the PlanOn system in good time.

2.3.12 CAD Manager, Estate & Facilities Management

Currently Stuart Dickson.

Space planning and the assignment of space codes is interlinked with the development and updating of Building Information Models (BIM) and associated CAD floor plans. Asbestos reports should also include floor plans of the premises that are hatched according to a pre-defined "asbestos key" (legend). Subsequently for the Contractors Asbestos Reports to be produced it is imperative that BIMs are up to date and CAD plans for floor areas are up to date and referenced according to the "asbestos key". The CAD Manager is responsible for ensuring this takes place in good time following changes to building layout so as to ensure that the asbestos register in PlanOn can be kept up to date and associated reports produced in good time.

2.3.13 Other EFM Staff

All other EFM staff who have the authority to commission works, or undertake works directly, which might disturb the fabric and structure of university buildings must comply with this management plan. Whoever commissions or undertakes such works (i.e. direct labour) will be responsible for checking the Asbestos Register, for liaising and cooperating with the Asbestos manager and for proceeding in an appropriate manner as detailed in this plan.

2.4 Other Departments

The directors and senior manager of other departments are responsible for ensuring that their staff and contractors are adequately informed and trained so as to safeguard themselves and others against exposure to asbestos fibres.

Whilst support can be sought from the EFM Department the responsibility rests with line managers and directors to ensure that their staff are working safely and the contractors they employ comply with university process and do not place others at risk.

SECTION 3: STRATEGY FOR COMPLIANCE

3.1 Introduction

Where necessary, buildings have been subject to a management survey for asbestos and the details recorded in a Register which is held by EFM. When intrusive and destructive surveys (refurbishment and demolition) are undertaken then the information obtained will be entered into the register and the register updated as and when remediation works are carried out.

1. The asbestos register is held in the Department's Computer Aided Facilities Management system, named 'Planon' which contains comprehensive data relating to the University's estate assets.
2. From 2015 the department commissioned new management surveys of all buildings that had previously been noted to contain asbestos materials. The data from these surveys has been uploaded to PlanOn and floor plans are being marked-up so that asbestos reports can be produced.
3. Alongside the programme of new surveys, annual re-inspection surveys continue and any remedial actions arising from both sources are planned and prioritised.
4. EFM are currently arranging for the upgrade of the PlanOn system to a more recent version to allow for better functionality. This element of work is the responsibility of the EFM Systems Manager.
5. It is anticipated that PlanOn will endeavour to improve functionality of the asbestos module and the user interface experience for all involved.
6. There is a commitment to introduce a Planon 'mobile solution' which will allow site staff to interact with Planon remotely (i.e. via a held device). It is at present uncertain as to whether advantage can be taken of this development to further improve the interface with the Asbestos Register but this aspect will be explored further as the project develops.
7. So that meaningful reports can be produced for building contractors and others to assess building asbestos information the asbestos data is now exported from PlanOn to an MS Access database from which reports are produced. The reports, including floor plans and photographs are made into mobile accessible PDF files and are made publically available on the departments' webpage. This webpage is available to individuals through their mobile devices.
8. An Asbestos Officer has recruited to commence on the 1st August 2016 on a fixed term three year contract. They will be responsible for the management of ACM and the development of the asbestos register as well as assisting with the development of the PlanOn asbestos module.

3.2 Survey Strategy

Future programmes of surveys and re-inspections will be agreed by assessment of the current information and situation for each building. Each building will be assessed using the following criteria;

1. **Age of building** (Buildings constructed after year 2000 will not be surveyed as asbestos containing materials were no longer legally available in the UK)
2. **Known asbestos/ previous asbestos records**
3. **Date of last survey/inspection**
4. **Known or planned project works (demolition/ refurbishment)**
5. **Occupational use/ access issues**

3.3 Types of Asbestos Surveys

On 29th January 2010 the HSE released [HSG 264 Asbestos: The Survey Guide](#). This document expands on and replaces MDHS 100. The document is aimed at those conducting Surveys, those who commission surveys and those with specific responsibilities for managing asbestos in accordance with Control of Asbestos Regulations (CAR) 2012.

3.3.1 Management Survey:

A Management Survey is a standard survey and will be used for the purposes of managing asbestos within properties. This is a non-intrusive survey based on a visual survey and where necessary sampling of materials subject to accessibility.

3.3.2 Refurbishment & Demolition Surveys:

Refurbishment surveys are required for all works which disturb the fabric of the building.

Demolition surveys should be conducted in the whole area to be refurbished or demolished, if necessary the entire building.

It should be noted that the type of survey conducted may not necessarily be suitable for the tasks you plan to undertake on the premises. A further definition of the different surveys types can be found in Appendix 1, *Survey Type Specification*.

3.4 Risk Assessments

There are two types of assessment that may be carried out on a known or suspected ACM; the Material Assessment and the Priority Assessment. When combined, these assessments indicate the overall Risk Assessment.

Some of the older surveys included within the old PlanOn Asbestos Register includes a 'removal priority assessment', based primarily upon an assessment of the type and condition of the material under each entry. This information will be upgraded to the full Risk Assessment in accordance with latest HSE guidance as described below as these surveys are updated. The results of these assessments will be inputted into the Asbestos Register

for each building as they are collated and used as a basis for recommended management options as information becomes available. The transition is expected to be completed by the end of 2016.

THE MATERIAL ASSESSMENT:

This assesses the ability of asbestos materials to release fibres into the air should they be disturbed. This assessment can be undertaken as part of the survey, as it requires no knowledge about the building use etc. The main parameters that determine the ability of the material to release airborne fibres and the relative hazard of the types of fibre released are;

- Product type (e.g. board, rope, cement, floor tiles, etc.)
- Extent of damage or deterioration
- Surface treatment
- Asbestos type (Chrysotile, Amosite or Crocidolite)

The Material Assessment algorithm will give a good initial guide to the priority for a control action, as it will identify the high-risk materials. A high material score may not always require a high priority control action. For example if no one needs to enter the area where a high risk material has been identified, then suitable precautions to reduce the risk need only be taken on the few occasions when the area is accessed.

THE PRIORITY ASSESSMENT:

This takes into account various human factors in order to modify the priority assigned by the Material Assessment. This can only be effectively achieved with direct input from the building occupier / managers. Parameters which should be considered would include;

- The location of the material
- Its extent/ size
- The use to which the location is put
- The level of occupancy of the area
- The activities carried on in the area
- The likelihood/ frequency with which maintenance activities are likely to take place.

The Priority Assessment algorithm will give a good initial guide to the priority for a control action, as it will identify the high-risk locations where asbestos containing materials (ACMs) are likely to be disturbed or interfered with during the day to day running of the building.

The MATERIAL ASSESSMENT score for each ACM

+

PRIORITY ASSESSMENT score for each ACM

=

RISK ASSESSMENT score for each ACM

3.5 Management Plan:

This Management Plan specifies how the risk from Asbestos Containing Materials (ACMs) identified within UoB can be adequately managed, so that as far as reasonably practicable no one can come to any harm from ACMs on the premises.

An Action Plan is included and will be used to prioritise and plan both immediate and longer term steps to mitigate the risk from known or suspected asbestos materials identified within the UoB.

This Management Plan will be made available, in addition to the buildings Contractors Asbestos Reports, for reference and use of all building users and employees at each building. It refers directly to, and is designed to complement, building-specific information held within the Asbestos Register.

Following an asbestos survey of a building a building asbestos management plan will be developed which identifies the scope of asbestos works required over the next 12 to 24 months to ensure compliance.

The Management Plan and the Contractors Asbestos Reports are available to any interested party on the E & FM Department website.

3.6 Asbestos Register:

Information regarding the location and condition of asbestos for the UoB has been recorded in an Asbestos Register for each building and is held within the department's Computer aided Facilities Management system 'Planon'.

This data is then used to produce the Contractors Asbestos Report which includes marked up floor plans and details of all known or presumed asbestos and materials that were suspected of being asbestos, were sampled and then found not to contain asbestos.

The information recorded on the Asbestos Register is based principally upon surveys which closely conform to the definition of Management Surveys. Some information has been noted from Refurbishment Surveys when there was been good reason to make strong presumptions for other parts of the building.

In some instances the Register will note the absence of definitive information and will state 'presumed asbestos'. This principle must be followed wherever the area under investigation was not accessible or was outside of the scope of the surveys so that where there is a lack of information, asbestos must be presumed to be present.

The Asbestos Officer arranges all updates to the Register so that it will always remain current. Only appointed EFM staff have the ability to amend or enter information on the Register.

It should be noted that the type of survey previously undertaken may not necessarily be suitable for the tasks you plan to undertake on the premises; it is possible that asbestos remains in areas previously inaccessible or in areas outside the scope of the original survey/ information and therefore before any works are undertaken it must be considered whether it is appropriate to undertake a further 'Demolition & Refurbishment survey to any part of the building affected.

If you are unsure where the information you have is accurate or reliable, you should ask the EFM Department to have the area in question assessed by a competent person.

3.7 Approved Asbestos Contractors:

Remediation, analytical and surveying contractors are generally be selected via the Construction Line database and must hold the following accreditations / licences:

All contractors:

- SSIP – Safety Systems in Procurement certification (CHAS, Safe Contractor, etc.)
- Environmental licence – if directly disposing of waste – or provide copy of waste partners licence.
- ISO 9000 Quality Management.
- ISO 1400 Environmental Management.

Remediation Contractors:

- ARCA - Only fully contracting members of the Asbestos Removal Contractors Association (ARCA) are permitted to undertake remediation work.
- HSE licence – Remediation contractors must hold a valid HSE licence.

Surveying & Analytical Contractors:

- Analytical service providers must hold an appropriate United Kingdom Accreditation Services (UKAS) certificate of accreditation.
- ISO 7078:1985 Building construction – Procedures for setting out, measurement and surveying.

EFM shall also hold certain information regarding the licence details, insurance, Health and Safety Policy, and training records and other relevant information to provide evidence of the competency of each contractor.

3.8 Records of Exposure/ Incidents:

These records will detail the exact nature and known extent of any exposure to asbestos that has occurred in a UoB controlled premises to a UoB employee. Contractors, including asbestos removal contractors will be expected to control the records for their own staff unless previously arranged. The Department of Occupational Safety & Health Services accident/incident system is used to record such incidents. Whilst every step has been taken to ensure exposure to asbestos does not occur, it is vital good record keeping is maintained.

3.9 Information, Instruction & Training:

Only licenced contractors will be permitted to carry out work on all types of asbestos containing materials. Construction, maintenance and engineering operatives must be able to recognise asbestos-containing materials (ACMs) and know what to do if they come across them in order to protect themselves and others. There are three main levels of information, instruction and training. These relate to:

- Asbestos awareness
- Non-licensable work with asbestos including NNLW
- Licensable work with asbestos.

Attending a training course on its own will not make a worker competent. Competence is developed over time by implementing and consolidating skills learnt during training, on-the-job learning, instruction and assessment. It is important that the level of information, instruction and training is appropriate for the work and the roles undertaken by each worker (and supervisor). Using a training needs analysis (TNA) will help to identify what topics should be covered to ensure workers have the right level of competence to avoid putting themselves or others at risk.

Information, instruction and training for asbestos awareness is intended to give workers and supervisors the information they need to avoid work that may disturb asbestos during any normal work which could disturb

the fabric of a building, or other item which might contain asbestos. It will not prepare workers, or self-employed contractors, to carry out work with asbestos-containing materials. If a worker is planning to carry out work that will disturb ACMs, further information, instruction and training will be needed.

Information, instruction and training about asbestos awareness should cover the following:

- the properties of asbestos and its effects on health, including the increased risk of developing lung cancer for asbestos workers who smoke
- the types, uses and likely occurrence of asbestos and asbestos materials in buildings and plant
- the general procedures to deal with an emergency, e.g. an uncontrolled release of asbestos dust into the workplace
- how to avoid the risk of exposure to asbestos

Asbestos awareness training must satisfy the requirements of Regulation 10 of the Control of Asbestos Regulations 2012 and the supporting Approved Code of Practice L143 'Managing and working with asbestos'. Workers who plan to carry out work that will disturb asbestos require a higher level of information, instruction and training, in addition to asbestos awareness. This should take account of whether the work is non-licensed; notifiable non-licensed work (NNLW); or licensed work and should be job specific.

The EFM Department has an ongoing program of asbestos awareness training, the details of which are noted in Section 6.

It is the responsibility of all UoB contract managers to ensure that any contractor they appoint whose work may cause them to come into contact with ACM has undergone an adequate degree of information, instruction and asbestos awareness training. Contract managers should seek confirmation of this training and retain records on the contract file.

3.10 Action for compliance strategy:

1. **Implement** the PlanOn system upgrade for improved functionality.
2. **Review** schedule of current management surveys and ensure all buildings requiring a survey have been surveyed and the data is included in the new PlanOn register module.
3. **Ensure** within reasonable time all the above asbestos records are collated and maintained by the Asbestos Officer.
4. **Ensure** that all relevant staff are aware of the location of all asbestos records and how to access them.
5. **Produce** marked up floor plans with the new legend.
6. **Develop** list of approved regional contractors and consider the use of framework or term contracts.
7. **Develop and implement** building asbestos management plans.

SECTION 4: ASSESSMENT OF ASBESTOS

4.1 Initial Assessment: University of Brighton

Within the UoB buildings portfolio, a programme of new management surveys was undertaken in 2015/2016. These surveys have updated information previously held about the location and condition of asbestos materials within the University and from this any further actions will be planned and prioritised.

4.2 Special Assessment

4.2.1 Planned Works:

Planned works include larger scale refurbishment, demolition or other project works which may be affected by the presence of asbestos, but also day to day maintenance and installation works being carried out within any UoB owned or controlled buildings.

In essence, no works which may affect or be affected by the presence of asbestos should take place until a competent EFM Department staff member or their appointed agent has assessed the area. The purpose of this assessment is to highlight the location, type and condition of any known or suspected ACMs in the work area so that appropriate action can be taken BEFORE any works take place, and to ensure that no one accidentally disturbs asbestos or is exposed to asbestos without adequate protection (control measures) being in place. This assessment should be specific to the task/ planned works and need only be a simple check of the available asbestos information.

Under no circumstances may a structural engineering or other consultant or their sub-contractors make openings in the fabric of an 'at risk' building until a detailed intrusive type survey of the areas to be disturbed has been carried out. Where it is considered that asbestos will need to be disturbed by the work or is at risk of accidental damage will the survey must be carried out by a UKAS accredited surveying concern.

All surveys will be requested from the Asbestos Officer who in turn will appoint an appropriate surveying concern.

The Asbestos Officer will manage all assessment records and reports and advise other EFM staff and their consultants of the outcome.

All removal or remediation works must be approved by the Asbestos Manager/Officer and only approved licensed asbestos contractors will be used to carry out any works on asbestos.

All UoB staff must follow established safe working practices and procedures in order to minimise the risk to exposure and the release of asbestos fibres in the air. Employees must report immediately to the Asbestos Manager/Officer any defect in any safety measure, device or facilities or any item of personal protective equipment.

Employees and contractors should be made aware that some areas are listed as 'No Access' on the Asbestos Register. These must be presumed to contain asbestos unless there is strong evidence to the contrary. Procedures for those working near known asbestos, including emergency procedures, should also be clearly communicated.

More information is given as to asbestos-safe working in Section7, *Safe Systems of Work*.

4.2.2 Unplanned Incidents:

Any accidental disturbance of material known or suspected of containing asbestos must be assessed by the Asbestos Manager/Officer. Any incident, no matter how small, must be reported.

More detail as to what to do if known or suspected asbestos is disturbed is given in Section 11, *The Emergency Procedure*.

What to do following inadvertent exposure:

People who believe they may have been exposed to asbestos are understandably anxious and concerned about the possible effects on their health. Many cases of inadvertent, short-term exposure to asbestos will most likely have led to minimal exposure to fibres, with little likelihood of any long-term ill health effects.

Although the type of asbestos involved and duration of exposure may be known, there may be little reliable information about the level of exposure. These are all important factors in determining the level of risk - the more fibres that are released by an asbestos-containing material, and the longer the work activity lasts, the greater the cumulative exposure to asbestos fibres and, therefore, an increased risk of ill health effects.

Some work activities are more likely to create a significant concentration of asbestos fibres in the air, and therefore, add to the risk if suitable precautions are not in place; for example:

- use of power tools (to drill, cut etc.) on most ACMs
- work that leads to physical disturbance (knocking, breaking, smashing) of an ACM that should only be handled by a licensed contractor e.g. sprayed coating, lagging, asbestos insulating board (AIB)
- manually cutting or drilling AIB
- work involving aggressive physical disturbance of asbestos cement e.g. breaking or smashing

Some asbestos-containing materials release fibres more easily than others. For detailed information on types of asbestos-containing material and the likelihood of fibre release, see: Appendix 2 (page 53) of *Asbestos: The survey guide*.

If university staff or students are concerned about possible exposure to asbestos from work activities carried out on university premises, they are advised to report the matter using the university accident/incident reporting system. They will be referred to Occupational Health who will advise HR to include a note on their personal file. In addition they should also consult their GP and ask for a note to be made in their personal record about possible exposure, including date(s), duration, type of asbestos and likely exposure levels (if known). In some circumstances, your GP may refer you to a specialist in respiratory medicine. Please note that the HSE does not advocate routine X-rays for people who have had an inadvertent exposure to asbestos. Asbestos-related damage to the lungs takes years to develop and become visible on chest X-rays. X-ray examinations cannot indicate whether or not asbestos fibres have been inhaled.

4.2.3 Continual Assessment: University of Brighton

It is imperative that both known and presumed asbestos containing materials are effectively monitored and that any management procedures are regularly assessed. If any procedures are proved to be inadequate or any accidental or unknown disturbance of asbestos materials has occurred then the necessary action can be taken.

4.2.4 Re-inspection:

All items that have been positively identified will require re-inspection at suitable intervals, subject to the risk rating derived from the approved algorithm. Certain items may be identified as requiring more frequent re-inspection but in general, where such onerous conditions exist, consideration will be given to removal.

The purpose of undertaking a re-inspection is to ensure that Material and Priority Assessments are still current, i.e. that the material has not deteriorated in any way and that the use of the building has not changed. Any change to

either criterion will result in the overall Risk Assessment being invalid and therefore a new assessment will be required. This should in turn be recorded.

Re-inspections are a requirement of legally binding Approved Code of Practice (ACoP): 'The management of asbestos in non-domestic premises', L127, published by the HSE.

4.2.5 Monitor and Review:

This Asbestos Management Plan should be reviewed and revised annually to ensure that all information is correct and that the plan achieves its objectives. This is an ACoP requirement.

It is envisaged that this plan will be reviewed when the new survey programme is nearing completion and if any changes to the structure, organisation or running systems of the E & FM Department occur.

More information regarding how to monitor and review this Management Plan is given in Section 8.



4.3 Action for the assessment of asbestos:

1. **Update** the Asbestos Register and this Management Plan to incorporate any new information gained.
2. **Refurbishment & Demolition (R&D) Surveys:** Ensure suitable assessments are undertaken before any works which may disturb known or suspected ACMs.
3. **Continual Assessment of ACM:** Arrange regular re-inspection of all ACMs within University of Brighton, as recommended in the asbestos register.
4. **Monitor and review** this Management Plan annually.

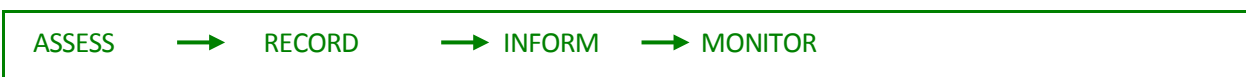
SECTION 5: RECORDING OF ASBESTOS INFORMATION

5.1 Asbestos Records

It is important that accurate, up-to-date asbestos records are gathered and maintained for each building. This section details what records should be kept and when they should be updated. The EFM Department is responsible for developing and maintaining a suitable asbestos records library.

The following information should be kept and updated for the EFM by the Asbestos Manager and the Asbestos Officer.

1. **Asbestos Register:** to be updated when new information becomes available
2. **Management Plan:** to be reviewed every 12 months, or when new information becomes available
3. **Training Records for EFM employees:** to be updated every time training is carried out
4. **Any training EFM provides to third party contractors, visitors or anyone else deemed necessary:** to be updated every time training is carried out
5. **Details of approved Asbestos Consultancy and approved contractors:** to be updated as new details become available
6. **Details of any asbestos surveying:** all survey records/data to be uploaded into the register and floor plans updated accordingly
7. **Details of any air monitoring, clearance testing, bulk sampling or any other types of testing or surveys on asbestos items:** to be updated when new information becomes available, for example at the end of every project
8. **Details of any removal or remedial works undertaken:** to be updated when new information becomes available, for example at the end of every project
9. **Details of any re-inspections** carried out: to be updated as new details become available and the remedial actions identified will form an addendum to this plan and works prioritised and planned.
10. **Details of any other relevant** asbestos information: as it becomes available



5.2 Action for the recording of asbestos data:

1. **Ensure** all changes to Asbestos Records, such as immediate remedial works, any accidental damage, any training given, are recorded and all information is kept up to date.
2. **Ensure** all air monitoring certificates, clearance certificates, bulk sample certificates, survey reports, method statements and any other related documentation is returned to the Asbestos Manager or the Asbestos Officer.
3. **Develop** the PlanOn system to operate as an effective register and records archive.

SECTION 6: INFORMING ABOUT ASBESTOS

It is imperative that accurate, discernible and up-to-date asbestos information is made available to the relevant people before they start working in or near an area which is known or presumed to contain asbestos.

6.1 How information should be disseminated

All works at UoB which may affect or be affected by asbestos will be assessed prior to their commencement and the relevant information passed on to those who need it. It is the responsibility of all contract managers, project managers, project officers and managers of technical staff to ensure that asbestos controls are factored into their work-flow / project management processes and works are appropriately controlled and necessary information is delivered in time.

Current asbestos information that is held in the PlanOn asbestos register is made publically available in the Contractor Asbestos Reports, copies of which are available from the university website.

6.1.1 *Tendered Works (i.e. where detailed contract documents are produced):*

The Asbestos Register / Contractors Asbestos Report will be checked by the relevant Contract Administrator prior to the works being tendered to assess whether or not asbestos will affect the planned project and whether a Refurbishment survey will be required.

The Contract Administrator shall then be responsible for passing this information on to those contractors on the tender list, and for seeking advice or further information from the Asbestos Manager/Officer where necessary. Usually, this will involve inserting relevant information within the Pre Construction Information as part of the contract documentation.

Copy of the report must be handed to the Asbestos Officer who shall arrange for it to be made publically available on the university website. The report will be redacted once the project is complete and the PlanOn asbestos register has been updated and a revised Contractor Asbestos Report has been issued.

All asbestos surveys and remedial works must be controlled by the Asbestos Officer. Any remediation works must be agreed with the Asbestos Officer. Once the works have been completed the Contract Administrator must hand over all related documents as soon as is practicable so that the PlanOn asbestos register can be updated. Additionally, any default in the specific processes and procedures should be fed-back so that changes can be made where necessary.

6.1.2 *Small or Minor Works Instructed by a Purchase Order Only:*

(i.e. no other detailed contract documentation)

When the financial 'Efin' system is used to raise a purchase order for building works, an asbestos statement is included in every order raised. The purpose of this addition is to ensure that those carrying out the ordered works are aware that an asbestos assessment has been made, and the results of this assessment. It is just as important to inform all relevant parties if no asbestos has been identified, or if it is deemed that their works will not be affected by the presence of asbestos. This system is routinely checked and audited by EFM Admin staff prior to dispatch of orders, but it remains the responsibility of the person raising the purchase order to ensure that the relevant information is passed on to those carrying out the works.

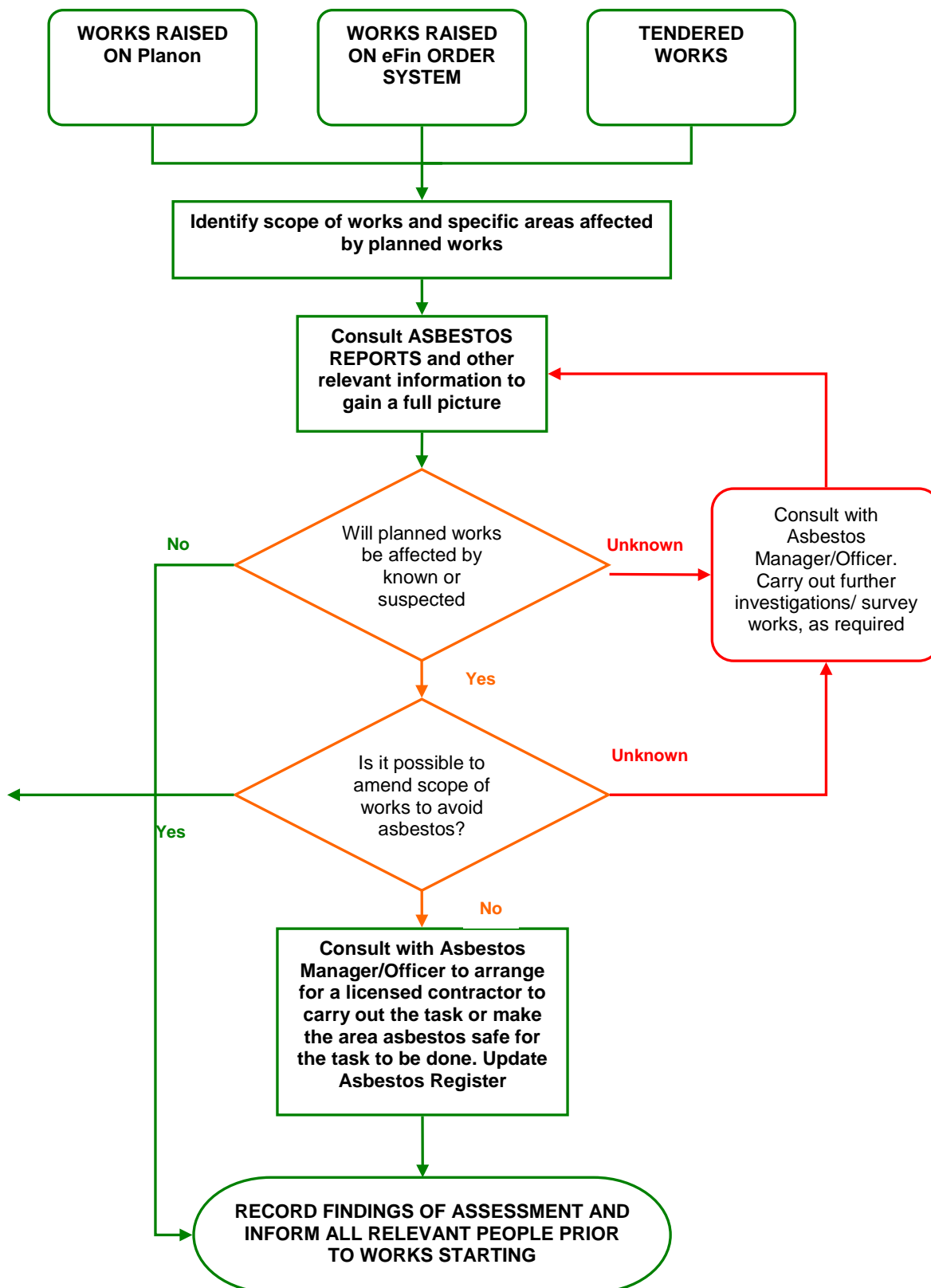
6.1.3 *In-House Maintenance Works:*

Works for craft workers and other UoB staff should not be carried out until the Contractors Asbestos Report has been checked. It will be the responsibility of the person undertaking the works to fully assess whether or not asbestos will affect their works. In this way all those who carry out routine, in-house maintenance are fully aware

of all relevant asbestos information prior to them undertaking the task, and if necessary putting appropriate safety measures in place first.

6.2 Action for informing about asbestos:

1. **Produce and revise as necessary** the Contractor Asbestos Reports so that relevant contractor information to be submitted with the tender details, or to be issued as on-site instruction.
2. **Ensure** all contracted third parties are given the results of any special assessments or any other asbestos information prior to works commencing.



This flow chart should be used as a guide for assessing works at UoB which may be affected by the presence of ACMs.

SECTION 7: ASBESTOS TRAINING

7.1 Training and feedback

Within the University of Brighton there are three main user groups who require regular asbestos awareness training and the opportunity for feedback; firstly those who plan, monitor or supervise planned works (both special projects and day to day maintenance); secondly those who actually carry out this work; and thirdly those who use the university buildings on a once-off basis or who are brought in for contracted works or who are third party contractors.

The EFM Department makes available asbestos awareness training to all EFM staff and IT Services staff whose work, or the work their appointed contractors undertake, is likely to bring them into contact with ACM.

The training, which is made available through the Safety Media e-learning facility, consists of an interactive training session and a video. The training has been designed to provide all relevant personnel with the skills and knowledge necessary to understand the hazards and risks involved when working in or near an area where asbestos has been identified. The training modules have been independently verified by RoSPA and are recognised by The CPD Certification service.

The e-learning modules include formative learning assessments and risk profiling question sets which allow staff to feedback concerns and for managers to assess risk and address issues appropriately.

Records of completion are retained in the e-learning system and records of historic awareness training are held in a separate EFM SharePoint folder.

In addition to this the EFM Department provides an asbestos awareness presentation on the department website. It is located along with the Contractors Asbestos Reports and this Plan.

It is not envisaged that any training will be required by students, or those who work within UoB buildings but do not disturb the fabric of the building, such as teaching and administration staff.

7.2 Those who plan and manage works

Those who plan and manage works must complete the asbestos awareness training on the e-learning system and must be appropriately briefed on safe systems of work and procedures.

As noted in Section 5 ... "It is the responsibility of all contract managers, project managers, project officers and managers of technical staff to ensure that asbestos controls are factored into their work-flow / project management processes and works are appropriately controlled and necessary information is delivered in time."

All Contract Administrators (or those likely to fill this role); all staff who manage the day to day maintenance service; all E & FM senior management; anyone who can place an order for works and anyone else carrying out similar or supportive roles must be briefed by their line-manager about their responsibilities and the procedures to be followed. Additionally managers from IT Network Services, involved with data cabling installations, must ensure that their colleagues are aware of all aspects of asbestos management within the university.

Briefings should cover;

1. **An introduction** explaining what asbestos is, and the hazards associated with it, etc.
2. **An introduction** to asbestos related legislation and current health and safety requirements

3. **A summary** of the location of any known or suspected ACMs which may affect, or are local to, those present and how the university manage the asbestos using this plan
4. **A summary** of the information held by UoB and how to gain access to it and any new procedures that are to be adopted
5. **What to do** should they suspect ACMs have been accidentally disturbed
6. **How to continue** normal university running should any planned asbestos works take place.
7. **Who to feedback to** should they have any comments or queries, or once works have been completed

7.3 Those who carry out maintenance

It is mandatory for those EFM staff who carry out routine maintenance, or regularly access voids or risers, or who regularly disturb the fabric of the building to complete the asbestos e-learning training. This will include people such as all craft workers and anyone else deemed in a similar or supportive role for whom the EFM Department deem training necessary.

7.4 Those who carry out project works

It is mandatory that all EFM staff who manage, administrate or coordinate building projects complete the asbestos e-learning training.

Contracted third parties, anyone involved in special project works, demolition or refurbishment works to University of Brighton which may cause the disturbance of the fabric of the building must provide copies of asbestos awareness training certificates.

Before works commence on site all operatives must be briefed on:

1. **An explanation of what asbestos is:** explaining what asbestos is, and the hazards associated with it, etc.
2. **A brief summary** of the information provided by the University of Brighton or other parties and how to gain access to it.
3. **A detailed summary** (or walk round) of the locations of any known or suspected ACMs and the types of activities which are prohibited, areas which are controlled access, etc., relevant to the works being undertaken.
4. **What to do** should they suspect ACMs have been accidentally disturbed
5. **Who to feedback to** should they have any comments or queries

7.5 Action for asbestos awareness and competency training:

1. **Identify** EFM and IS staff who will require training.
2. **Develop & implement** a training strategy
3. **Record** details of training given and update accordingly.
4. **Refresh** training at suitable interval.

SECTION 8: SAFE SYSTEMS OF WORK

The Asbestos Officer or in their absence the Asbestos Manager must control all asbestos surveys, analytical and remediation works.

Should any project manager or surveyor or other EFM staff require a survey or remediation works then they must request that the Asbestos Officer undertake or arrange for such works. In all circumstances any asbestos related work must be controlled by the Asbestos Officer.

Only licenced asbestos removal contractors will be permitted to remove or remediate ACM and prior to commencing work they are to produce necessary risk assessment and a Plan of Works in keeping with HSE Guidance HSG247, Asbestos: The licenced contractors' guide.

The asbestos officer and appointed contractors are to assess the impact asbestos works will have on the day to day functions on site and ensure that necessary precautions are noted in risk assessments and appropriate consultation is undertaken with stake holders and affected parties.

All persons must co-operate and ensure the Asbestos Officer is central to the process of identification, assessment and control of asbestos.



Works within the UoB have been split into four categories for this section:

1. Works for which a contract is needed and which are therefore controlled by a Contract Administrator;
2. Works for which an order is raised (but which are not covered by a contract necessarily);
3. Works which are carried out by in-house staff, such as day to day maintenance, ; and
4. Any other works which are carried out in the university buildings, not necessarily controlled by the E & FM Department, or by any of the above means - IT Network Services have been included here.

8.1 Tended Works

The Asbestos Officer must control all asbestos related surveys and work. The Contract Administrator for each job should ensure they liaise with the Asbestos Officer to ensure the potential presence of ACM has been assessed prior to the contract being tendered or awarded. Information must be noted in the EFM Project Information & Hazard Schedule and when necessary a copy of an asbestos report included in the tender pack.

This process is to highlight, where safely practicable, the location, type and condition of any known or suspected ACMs in the work area at the earliest opportunity.

In some circumstances the assessment may have to be limited as the area may still be under occupation.

This assessment should be area specific to the project. It may be that there is not enough information to fully assess the tasks being carried out in which case further survey works may be required. This assessment should be specific to the task/ planned works. If an intrusive R&D survey is required then the area must be taken out of normal use and kept locked shut. The closure of the area must be noted on the central room booking service and appropriate notices posted at access points.

If asbestos is present then project works should only commence once all parties have agreed to how the asbestos will be managed or remediated and all relevant parties have been informed of these measures.

Where it is identified that ACM will need to be removed in order for works to be undertaken, a decision will need to be made whether the ACM are to be removed prior to commencement of the main project, perhaps under a separate contract with a licensed contractor, or whether the asbestos removal work is to be incorporated as part of the main project. It is essential that this information is included and properly described within the Pre Construction Information issued as part of tender documentation. It is just as important to inform all relevant parties if no asbestos has been identified or if any asbestos present is *not* likely to affect the planned works.

All works on asbestos must be undertaken by licensed contractors as noted in Section 2.6.

All persons must carry out work in accordance with regulatory requirements and codes of practice for asbestos work and operate within the University's working procedures.

The Asbestos Officer shall inform the Contract Administrator of the results of any assessments carried out where it is deemed that known or suspected ACMs will affect or be affected by the planned works. In addition, any remedial or removal works or any defects in the current system must be reported so that a feedback loop is established: it is vital that the Asbestos Officer is able to keep all asbestos records up to date and incorporate any new information gained through project works.

8.2 Works instructed by the issue of an order only

All persons able to raise an order for their works (not including tendered works - *see above section*) must ensure that the works for which they are responsible have been assessed prior to the works being carried out.

The purpose of this assessment is to highlight the location, type and condition of any known or suspected ACMs in the work area; in many cases need only be a simple check of the Asbestos Register or Contractor Asbestos Reports and no further action is required if it is deemed that the planned works will not be affected by any ACMs. However, where action is necessary, it is vital that appropriate steps are taken BEFORE any works take place to ensure that no one accidentally disturbs asbestos or is exposed to asbestos.

The results of any area specific assessments carried out for which further, positive action is needed should be fed-back to the Asbestos Officer so that the necessary advice and control measures can be decided in consultation with them. It may be that there is not enough information to fully assess the tasks being carried, out in which case further survey works may be required.

Once the assessment has been carried out then any necessary precautions (control measures), remedial or removal works can be identified. All works should only continue once steps to make the area asbestos-safe for the planned task have been carried out and all relevant parties have been informed of these measures. If possible details of this assessment should be passed on to those actually performing the task: it is just as important to inform all relevant parties if no asbestos has been identified or if any asbestos present will not affect the planned works.

8.3 In-house maintenance works

All UoB employed craft workers must ensure that the works for which they are responsible have been assessed prior to the works being carried out.

The purpose of this assessment is to highlight the location, type and condition of any known or suspected ACMs in the work area; it may be possible that no further action is required if it is deemed that the planned works will not be affected by any ACMs. However, where action is necessary, it is vital that appropriate steps are taken BEFORE any works take place to ensure that no one accidentally disturbs asbestos or is exposed to asbestos.

This assessment should be specific to the task/ planned works and need only be a simple check of the available asbestos information. Craft workers will be responsible for checking the Contractor Asbestos Reports themselves prior to undertaking any work. Wherever further assessment is required, due to the risk of disturbance of ACM, this will be undertaken by the Site Technical Officer who will obtain any further necessary advice from the Asbestos Officer.

Training will be provided to all staff involved and support will be provided from the Asbestos Officer.

Once the assessment has been carried out then any necessary precautions (control measures), remedial or removal works can be identified. All works should only continue once steps to make the area asbestos-safe for the planned task have been carried out and all relevant parties have been informed of these measures. If possible details of this assessment should be passed on to those actually performing the task: it is just as important to inform all relevant parties if no asbestos has been identified or if any asbestos present is not likely to affect the planned works.

8.4 All other works

All work which involves disturbance of the structure or fabric of buildings within the University estate is normally undertaken by the Department of Estate and Facilities Management. This includes work which is requested and funded directly, by other departments and schools.

Information about asbestos and the procedures adopted by EFM in accordance with this Management Plan is to be disseminated to staff throughout the University to ensure that no other 'minor' work is undertaken directly by others who may inadvertently breach the agreed procedures. The contractor management process under which this is to be achieved will be developed by the University's Department of Health & Safety.

The exception to this rule is in respect of data cabling work which is undertaken directly by the Department of Information Services (Network Services section). Appropriate staff from this department will be provided with suitable training so that they are able to operate the same procedures as EFM, having accessing the Asbestos Register in an agreed manner. IS now has direct access to the Contractor Asbestos Reports.

The intention of the above is to ensure that no one inadvertently disturbs asbestos by undertaking apparently 'innocent, minor work' within their own dedicated areas e.g. putting up shelving, notice boards, etc.

8.5 Action for developing and maintaining safe systems of work:

1. **Develop, record and regularly assess** safe systems of work for all EFM asbestos works carried out within all university buildings. Ensure all relevant information is passed on to those who need it prior to works starting.
2. **Develop and maintain links** with other university departments to help ensure that no work is undertaken in breach of the agreed procedures.

SECTION 9: HOW TO MONITOR AND REVIEW THIS PLAN

The key objective of the Management Plan is to reduce the risk of exposure to ACM's. If it can be demonstrated that the risk from asbestos containing materials within University of Brighton buildings is under control, this Management Plan will be fulfilling its intended purpose.

The following will be carried out to ensure this document remains valid and that the risks from asbestos are being adequately assessed.

- **Ensure that all recommended actions within this document are undertaken within the given timescales.** Any action points should be resolved and the outcome recorded. An annual internal audit will be undertaken by the Asbestos Manager.
- **Regularly update the Asbestos Register and all other Asbestos Records as soon as new information becomes available as surveys are completed.** This should be undertaken by the Asbestos Officer, so that a paper and electronic copy of the asbestos records can be maintained and controlled in a central location. Input is vital following any remedial works or new surveys, etc.
- **Update this Management Plan at a suitable interval.** The plan will be reviewed normally on an annual basis, following an annual audit, although substantive amendment may only become necessary when there is a change of structure or work processes.
- **Ensure this plan is referred to in relevant University of Brighton in-house procedures and Safe Systems of Work documents.** Other health and safety documents at the university should refer to the Asbestos Records where relevant.
- **Record lessons learned from previous incidents/exposures to asbestos.** Should any incidents occur, then they should be documented and the relevant procedures examined so that any necessary changes can be incorporated.
- **Ensure changes to the structure of the department are adopted and updated in the Management Plan.** This plan must remain relevant and applicable to all department functions, and be updated to incorporate any new procedures.

SECTION 10: ACTION PLAN FOR 2016 / 17

This section details what steps should be taken in the short and long term to achieve to goal of effective asbestos management. The detail given here is further to the comments and recommendations given within the Asbestos Register. Further guidance on the following table is given in Appendix 3 *Glossary of Terms*.

10.1 Action Plan and timescales

The following are brief indications of the actions taken and planned in the short term together with anticipated timescales:

Section 3 – Strategy for compliance		
Item	Action	Timescale
1	Implement the PlanOn system upgrade for improved functionality. Resolve outstanding issues with new Planon asbestos module to facilitate direct electronic transfer of new survey data, upload available new survey data for Watts and make the module 'live.	July 2017
2	Review schedule of current management surveys and ensure all buildings requiring a survey have been surveyed and the data is included in the new PlanOn register module.	Target: December 2016
3	Ensure within reasonable time all the asbestos records are collated and maintained by the Asbestos Officer	February 2017
4	Ensure that all relevant staff are aware of the location of all asbestos records and how to access them	Ongoing
5	Produce marked up floor plans with the new legend	December 2016
6	Develop list of approved regional contractors and consider the use of framework or term contracts.	March 2017
7	Develop and implement building asbestos management plans.	December 2016
Section 4 – Assessment of asbestos		
1	Update the Asbestos Register and this Management Plan to incorporate any new information gained.	Ongoing
2	Refurbishment & Demolition (R&D) Surveys: Ensure suitable assessments are undertaken before any works which may disturb known or suspected ACMs.	Ongoing
3	Continual Assessment of ACM: Arrange regular re-inspection of all ACMs within University of Brighton, as recommended in the asbestos register.	Ongoing but take action on overdue buildings
4	Monitor and review this Management Plan annually.	July 2017
Section 5 - Recording of asbestos information		
1	Ensure all changes to Asbestos Records, such as immediate remedial works, any accidental damage, any training given, are recorded and all information is kept up to date.	Ongoing
2	Ensure all air monitoring certificates, clearance certificates, bulk sample certificates, survey reports, method statements and any other related documentation is returned to the Asbestos Manager or the Asbestos Officer.	Ongoing
3	Develop the PlanOn system to operate as an effective register and records archive.	July 2017 (as Section 3, Item 1)
Section 6 – Informing about asbestos		
1	Produce and revise as necessary the Contractor Asbestos Reports so that relevant contractor information to be submitted with the tender details, or to be issued as on-site instruction.	Ongoing

2	Ensure all contracted third parties are given the results of any special assessments or any other asbestos information prior to works commencing.	Ongoing
Section 7 – Asbestos awareness and competency training		
1	Identify EFM and IS staff who will require training.	November 2016
2	Develop & implement a training strategy.	February 2017
3	Record details of training given and update accordingly.	Ongoing
4	Refresh training at suitable interval.	Ongoing
Section 8 – Safe systems of work		
1	Develop, record and regularly assess safe systems of work for all EFM asbestos works carried out within all university buildings. Ensure all relevant information is passed on to those who need it prior to works starting.	Ongoing
2	Develop and maintain links with other university departments to help ensure that no work is undertaken in breach of the agreed procedures – especially the Information Services Department and Network Services staff and installation contractors.	Ongoing

SECTION 11: THE EMERGENCY PROCEDURE

Asbestos has been identified within University of Brighton; information as to the extent and location of identified ACMs can be found in the Asbestos Register.

In addition, it should be noted that areas of 'No access' identified in the Asbestos Survey should also be assumed to contain asbestos unless there is strong evidence to the contrary.

If anyone suspects that an asbestos containing material has been disturbed then the following steps should be taken IMMEDIATELY.

1. The immediate vicinity should be evacuated as soon as possible. Without causing alarm, the area should be cordoned off and preferably locked until a full assessment has been completed.
2. The Asbestos Manager should be informed immediately. All incidents - no matter how small - must be reported and recorded.
3. The Asbestos Register should be consulted to establish whether or not any asbestos records previously exist regarding the area in question.
4. A full assessment of the situation should be carried out by a competent person to establish the extent and nature of any damage, possible contamination and suggested remedial actions.
5. If possible the names of all staff/ contractors, etc. potentially affected by the incident should be recorded.

Emergency Contact Numbers

Tom Draisey
Asbestos Officer, EFM Department
Tel: 01273 641449
Mobile: TBA

Or,

Edwin Underwood
EFM Departmental Safety Advisor & Asbestos Manager
Tel: 01273 641449
Mobile: 07970906467

Or,

University of Brighton alternative contact:

Tony Rodriguez
Assistant Director Estate & Facilities Management
Tel: 01273 643 138
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APPENDIX 1: SURVEY TYPE SPECIFICATION

Asbestos Surveys

This section details the purpose of the survey and presumption and identification of ACM, the types of surveys, survey restrictions and caveats, survey strategy for both non-domestic and domestic properties. Under purpose of the survey it re-iterates information within CAR 2012 that an asbestos survey should be conducted for all properties (type determined by requirement) which is used to create an asbestos register, a risk assessment and a management plan to manage the risks of asbestos.

One of the main changes from MDHS 100 is the types of surveys and terminology. Under HSG 264 there are two types of survey instead of three. Type 1 and Type 2 surveys have now been combined together into Management Surveys and Type 3 Surveys are now termed Refurbishment and Demolition Surveys.

Management Survey

Management survey is a standard survey and will be used for the purposes of managing asbestos within properties. The survey will often involve minor intrusive work and some disturbance to facilitate foreseeable maintenance and related activities and can involve a combination of sampling to confirm asbestos is present or presuming asbestos to be present. An assessment of the condition and ability to release fibres into the air if they are disturbed in some way should also be undertaken for each ACM.

Refurbishment Surveys

Refurbishment Surveys are required for all works which disturb the fabric of the building in areas where the management survey has not been intrusive.

Demolition Survey

Demolition Survey should be conducted in the whole building if demolition is planned. A refurbishment and demolition survey is also required when more intrusive maintenance and repair work will be carried out or for plant removal or dismantling. The manner in which caveats and survey restrictions are discussed and agreed is detailed.

Under Survey Strategy for non-domestic properties, the guide states that there is an expectation that every building will be surveyed on an individual basis to identify the presence and condition of asbestos. It also details a survey strategy for domestic properties specifically targeted at Local Authorities and Housing Associations managing large numbers of domestic properties. This process involves a desktop study to establish probable asbestos status of groups of properties and details when management surveys and when refurbishment surveys should be conducted in these properties.

Assessments

Whereas it is possible to extrapolate the location of asbestos within a premises the assessment should relate to the individual item of asbestos, i.e. it is possible that an asbestos door panel recurs throughout a building and it is equally possible that in one room the panel is in a safe condition but in the room next door that the panel is broken and in a poor condition.

APPENDIX 2: ASSESSMENT ALGORITHMS

Material Assessment

Product Type	Score	Examples
	1	Ebonite, cement, lino, paints, artex etc.
	2	AIB boarding, gaskets, ropes, textiles etc.
	3	Thermal insulation

Condition	0	No visible damage
	1	Low damage – e.g. scratches
	2	Medium damage – e.g. breakage of material revealing fibres
	3	High damage – visible debris

Treatment	0	Composite materials – Ebonite, vinyl's, painted AC
	1	Enclosed sprays and lagging, encapsulate. AIB, unsealed AC
	2	Unsealed AIB, encapsulate. Lagging and sprays
	3	Unsealed lagging and sprays / debris

Asbestos Type	1	Chrysotile
	2	Amphibole asbestos excluding Crocidolite
	3	Crocidolite

Priority Assessment

Assessment parameter	Score	Assessment	Examples of score variables
Normal occupant activity			
Main type of activity in area	0		Rare disturbance activity (e.g. little used site room)
	1		Low disturbance activities (e.g. office type activity)
	2		Periodic disturbance (e.g. industrial or vehicular activity which may contact ACMs)
	3		High levels of disturbance, (e.g. Fire door with AIB sheet in constant use)
Score			

Likelihood of Disturbance			
Accessibility	0		Usually inaccessible
	1		Occasionally likely to be disturbed
	2		Easily disturbed
	3		Routinely disturbed
Location	0		Outdoors
	1		Large Rooms
	2		Rooms up to 100m ²
	3		Confined spaces
Extent	0		Small amounts or items
	1		<10m ² or 10m
	2		>10 – 50m ² or 10 – 50m
	3		>50m ² or >50m
Average Score			

HUMAN EXPOSURE POTENTIAL:			
Number of occupants	0		None
	1		1 – 3
	2		4 – 10
	3		>10
Frequency of use	0		Infrequent
	1		Monthly
	2		Weekly
	3		Daily
Average time each use	0		<1
	1		>1 - <3 hours
	2		>3 - <6 hours
	3		>6 hours
Average Score			

Maintenance Activity			
Type of maintenance activity	0		Minor disturbance (e.g. possibility of contact when gaining access)
	1		Low disturbance (e.g. changing light bulbs in AIB ceiling)
	2		Medium disturbance (e.g. lifting one or two AIB ceiling tiles to access a valve)
	3		High levels of disturbance (e.g. removing a number of AIB ceiling tiles to replace a valve or for re-cabling).
Frequency of maintenance activity	0		ACM unlikely to be disturbed for maintenance
	1		≤1 per year
	2		>1 per year
	3		> 1 per month
Average Score			

Category Codes - Material Assessment

Cumulative score	Assessment Score	Action Required
10 - 12	A	This is allocated to those items requiring urgent attention as they currently, or in the foreseeable future, present an unacceptable risk. That is to say that fibre concentrations could rise above 0.01 fibres/m.
7 - 9	B	These are items which as single entities have a high risk of being damaged/ disturbed or where there is an accumulation of asbestos materials in a single location that when examined as a whole have a high risk of being damaged/ disturbed. The main difference between Cat A and Cat B is that Cat A materials are currently in a state likely to expose people whereas Cat B items may show signs of historic damage but this damage has been made good and debris cleared up.
4 - 6	C	These are items that have no, or very little, sign of historical damage and are usually board or panels, which are not easily accessed.
0 - 3	D	This covers asbestos cement, resins, artex, plastics, rubber etc containing asbestos, which do not generally present a significant risk.

Category Codes - Priority Assessment

Cumulative score	Assessment Score	Action Required
10 - 12	1	This is allocated to those items found in locations that present an unacceptable risk to occupiers etc.
7 - 9	2	These are items situated in high use, readily accessible positions, which may also be located in an area accessed on a routine basis for maintenance.
4 - 6	3	These are items that will very rarely be disturbed through normal occupation or maintenance, or are in locations or extents that if disturbed would lead to a minimal fibre release.
0 - 3	4	This covers items that are in locations not readily accessible and are unlikely to be disturbed.

Risk Assessment Summary

The MATERIAL ASSESSMENT score for each ACM asset + The PRIORITY ASSESSMENT score for each ACM asset
 = The RISK ASSESSMENT score for each ACM asset

Risk Rating	Score (e.g.)
Total Material Assessment Score (maximum 12)	8 +
Total Priority Rating Score (maximum 12)	10
Risk Score (Total overall score – maximum 24)	= 18

The risk posed by ACMs is determined using the algorithm defined in HSE guidelines.

The risk ACMs pose could immediately increase should it be disturbed in any way.

Material risk is assessed using a combination of scores against:

- Product type
- Extent of damage/deterioration
- Surface treatment
- Asbestos type

These scores are combined to arrive at the following risk ratings.
 Areas of no access are rated as high risk and are coded blue.

Risk Level	Risk Value Range
Low Risk	0 to 8
Medium Risk	9 to 16
High Risk	16 to 24
No Access	Treat area as potentially High Risk

N.B. The colours used on this chart should be used as an additional guide; the Risk Assessment score of a particular item of asbestos is used as the basis for assessing possible asbestos management options.

APPENDIX 3: GLOSSARY OF TERMS

Asbestos: A naturally occurring, fibrous, silicate mineral. The Control of Asbestos at Work Regulations, 2002 refers to any material or product containing any of the asbestos types.

ACM: Asbestos Containing Material. A complete definition as to the percentage and type of asbestos content is given in the Asbestos Register.

AIB: Asbestos Insulation Board. This product is a lightly compressed board made from asbestos fibre and other filler materials.

Asbestos Register: A summary list of all identified items containing asbestos, their condition, location, any comments or recommendations and the type and extent of asbestos present. These documents are produced after an asbestos survey and should contain all analytical results, drawings, and a full introduction and methodology.

Hazard: Something that has the *potential* to harm a person or persons.

Risk: The *likelihood* of that hazard causing harm.

Control measure: Something that will *reduce* the risk posed by that hazard.

Risk Assessment: Risk rating given to each identified item of asbestos which incorporates factors such as the location and condition of the material, its likelihood of being disturbed, the materials use, and an indication of how urgent any remedial works may be.

MMMMF: Man Made Mineral Fibre. These products are often used as an asbestos alternative, and include products such as fibreglass.

Identified Asbestos: Refers to a brief description of the material found to contain asbestos.

Location: The exact location of the asbestos – the original survey report should be consulted to give more detailed information

Risk Score: This is the overall risk score that has been derived for completing and adding together of the Material and Priority Assessments. It states the overall risk that the item of asbestos represents in terms of likelihood of exposure.

Extent: Indicates the length, volume, or area of the asbestos containing material.

Removal – Recommendation: This indicates that, based on the assessment conducted, the recommended approach is to have the asbestos physically removed. Recommendations are based on the parameters available at the time. New information or a change in circumstance may alter these recommendations. All products falling under the Asbestos Licensing Regulations will require a licensed contractor.

Encapsulation – Recommendation: Some exposed or damaged asbestos material may require encapsulation that can significantly reduce the risk posed by the material. Once encapsulated it may be suitable to simply manage the asbestos through an effective re-inspection regime. The re-assessment of the material will dictate this outcome.

Manage – Recommendation: Asbestos that is good condition and is unlikely to be disturbed can be simply managed. However an appropriate re-inspection regime will still need to be implemented to ensure that the condition of the material or building use does not change.

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DEPARTMENTAL ASBESTOS MANAGEMENT PLAN

Date for Action: This details the timescale that remedial option should be undertaken. As and when any works are undertaken, all Asbestos Records must be updated.