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Introduction

This policy describes the arrangements that the University has in place to manage the potential health risks from Asbestos Containing Materials (ACM) present in Northumbria University's buildings. The aim of these arrangements is to eliminate or reduce exposure to airborne asbestos fibres to the lowest level reasonably practicable for all persons who work in, or otherwise use University buildings. It builds on existing control measures to meet the new requirements introduced with the Control of Asbestos Regulations 2012.

The instructions given in this document explain how the University complies with the Control of Asbestos Regulations 2012 and forms the University's Asbestos Management Policy.

Duty to Manage Asbestos

As the University are owners and occupiers of non-domestic premises and have maintenance and repair responsibilities for those premises, there is a duty to assess them for the presence and conditions of ACM.

This duty is undertaken by Campus Services on behalf of the University.

Where ACM are present Campus Services must ensure that the risk is assessed; that written plans identifying where ACM are located are prepared and that measures to manage the risks are set out in the policy and implemented.

Duties of Campus Services

Campus Services will:

- a) Develop and maintain the Asbestos Management Policy on behalf of the University;
- b) Produce and maintain an Asbestos Register for each property;
- c) Produce a priority risk assessment for each property which will enable the Department to rank the asbestos risk for each property;
- d) Produce an annual written plan of inspections based upon the Priority Risk Assessment score of the ACM and to update, where necessary, the Asbestos Register, this plan may be amended as works occur on existing ACM;
- e) Project-manage all asbestos related work on University properties. This includes liaising with contractors to be satisfied of their competence to undertake asbestos related works, agree plans of work, method statements and risk assessment;
- f) Provide Asbestos Awareness Training to University employees whose work could foreseeably expose them to asbestos.

Definitions:

CAR – the Control of Asbestos Regulations 2012.

ACM – Asbestos Containing Materials; any substance or material that contains asbestos.

Persons – within Campus Services, this includes Planning & Development staff, Maintenance Support Manager, Maintenance & Support Team Leaders, Tradesmen, contractors, sub-contractors, and other persons who are likely to work on buildings. Other University employees and the contractors they control may also fall within this group.

Buildings – includes the fabric of the building, its roof and exterior walls, ceilings, interior walls and panels, flooring materials, services, vessels and pipe-work (e.g. Boilers), ductwork (e.g. Air handling systems), equipment and appliances in workshops, laboratories, plant rooms, water tanks, lift shafts and plant, and domestic appliances. This is not an exhaustive list.

Licensed Asbestos Removal Contractor (LARC) – a contractor who is licensed by the Health & Safety Executive under the Control of Asbestos Regulations 2012 and normally a member of the Insulation and Environment Training Agency (IETA), or the Asbestos Control and Abatement Division (ACAD) Division of Thermal Insulation Contractors Association (TICA).

Health Risk – the risk of developing fatal asbestos related diseases is understood to increase with total lifetime dose of inhaled fibres. The dose of total inhaled asbestos fibres is a combination of the concentration of fibres in air and length of time a person is exposed, together with the number of occasions when that person is exposed.

Asbestos Management Policy

1.0 Policy Objectives

- a) All work on the building fabric, (as defined above) services, plant or equipment, whether carried out by University employees or external contractors, must be managed and conducted in a way that eliminates or at least minimises exposure to airborne asbestos fibres, so far as is reasonably practicable;
- b) In general, University employees and its contractors are not expected to do any kind of work with ACM, as this will be contracted out to licensed asbestos removal contractors under the supervision of an independent asbestos analyst appointed by Campus Services, not the Contractor.

The Head of Campus Planning & Development should arrange for this policy to be reviewed annually, or after a failure of the policy has led to persons being exposed to ACM, or a change in legislation.

2.0 Responsibilities

- a) General – Every person who works at Northumbria University is expected to approach their work with caution, and follow the arrangements in this policy where necessary;
- b) The Duty Holder under CAR will be the Head of Campus Planning & Development, who will be responsible for managing the arrangements made under this policy;
- c) Persons within Campus Services who carry out work on the University's buildings, must follow the arrangements in this policy;
- d) The Capital Works Manager is appointed as the Deputy Duty Holder and will oversee ALL work relating to the identification, repair or removal of any ACM and will ensure the quality and integrity of the method statement and risk assessments associated with each job and thereafter the recorded information on BADGER and the Asbestos Register, including the asbestos plans;
- e) University (non-Campus Services) line managers, whose staff could disturb ACM as a result of their work (this may involve inspections and walkthroughs) must ensure that they attend an Asbestos Awareness Course and understand this Asbestos Management Policy as it applies to them, and ensure that their staff use the facilities operated by Campus Services for managing ACM to avoid exposure as a result of their work;
- f) Contractors and any other persons who work at Northumbria University must co-operate with the University by complying with this plan.

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

- a) When a new building is acquired by the University, a Management Survey will be carried out. This will be commissioned by the University. The survey report should be in a format, and of a quality, that matches the surveys in our existing Asbestos Register; In respect of leased buildings negotiations must take place and agreement reached on who will provide, maintain and distribute this information.
- b) Before work starts on any University building, its fabric, services, plant or equipment, it is the responsibility of their line managers that all persons directly involved, whether operative, supervisor or manager, or contractor must:
 - i. Attend Asbestos Awareness Training on an annual basis to ensure that they are familiar with what asbestos is, where it can be found in buildings, what health hazards it presents and what employers have to do to control exposure to it;
 - ii. Contractors carrying out works on the fabric of the buildings must be able to demonstrate an appropriate commitment to asbestos awareness training for their operatives;
 - iii. Have read and understand the University's policy on controlling exposure to asbestos;
 - iv. Be given access to the BADGER maintenance system for each job, and consult survey information on ACM contained in the Asbestos Register. This must be signed for on each occasion by the relevant member of staff or contractor.

3.1 Looking for existing Information ACMS

- a) When a project or maintenance work is planned, the first step is to establish what information on ACM is held for the areas in which persons will be working. Where work is done by or on behalf of Campus Services, the job must first be entered on BADGER and a daily work schedule, contractor fax or project form produced. BADGER will indicate on these forms whether ACM are present in the following way:
 - i. Hazard 1 – asbestos identified in this room/area;
 - ii. Hazard 2 – asbestos identified in this building;
 - iii. Hazard 3 – asbestos not identified, proceed with caution.
 - iv. No asbestos in this building – new build.
- b) Using this to alert them to the presence of ACM known to the Asbestos Register, discovered by survey or sampling, employees must then refer to the information in the Asbestos Register for details of its exact location and extent, product type, material condition and asbestos type. This is contained in written form, with photographs and marked floor plans also.
- c) From the information in the Asbestos Register, the persons within Campus Services must decide if there are ACM within the area in which the work will be carried out or not, bearing in mind that the scope of the work may move beyond the room or area

originally planned. If necessary advice should be sought from a member of the Campus Services Asbestos Working Group (see Appendix 2).

- d) Where work is being carried out by other Departments in the University, for example, IT Network Teams they must first establish whether ACM have been identified in that area. The first step is to consult the Asbestos Register for the particular building and sign the register to acknowledge an understanding of the information contained in this. The registers are located in the following places:

City Campus – Campus Services, 4 North Street East
Coach Lane Campus - Security Office

For out of hours arrangements see Section 7 of this policy.

3.2 Work in Area Where ACM Have Been Identified

- a) If ACM are identified within the work area, the 'persons' within Campus Services must decide if the work they plan to carry out is likely to disturb the ACM, and what action they need to take to avoid exposing anyone to airborne asbestos fibres, if any. If necessary advice should be sought from a member of the Campus Services Asbestos Working Group;
- b) Where ACM can be left undisturbed by the work, the 'persons' within Campus Services are to monitor that they remain undisturbed as the work progresses;
- c) If there is a risk of ACM being disturbed by the proposed work, the person in charge of the job must consult with the Deputy Duty Holder who will carry out an assessment. This may involve its removal or encapsulation. Where licensed removal work is necessary it must be carried out by a licensed asbestos removal contractor under the direct supervision of an independent qualified asbestos analyst;
- d) Once the ACM have been removed or encapsulated, the main works can then proceed;
- e) When removal of the ACM is completed, a completed Hazardous Waste Transfer Note must be received from the removal contractor and forwarded to the University Sustainability Manager. This will be retained for a minimum of 3 years;
- f) The Capital Works Manager must ensure that the Asbestos Register, plans and BADGER are updated to show the extent of removal of ACM;
- g) When work involves dismantling or demolition of part of the building, its fabric, services, plant or equipment, a Refurbishment and Demolition Asbestos Survey (see HSE's HSG 264 Asbestos: The Survey Guide) must be commissioned before any work commences.

3.3 Work in Area Where No ACM Have Been Identified

- a) Where no ACM have been identified in the asbestos register, but dismantling or demolition of part of the building, its fabric, services, plant or equipment is involved, a Refurbishment and Demolition Survey (see HSE's HSG 264 Asbestos: The Survey Guide) must be commissioned. This must be documented for reference. "No work that would involve dismantling or demolitions of part of the building shall commence until the report has been issued to all parties and fully understood";

- b) If this Refurbishment and Demolition Survey discovers ACM, follow the procedure in section 3.2, paragraphs c to g above;
- c) If this Refurbishment and Demolition Survey does not find ACM, all persons involved in the works must proceed with caution, using their asbestos awareness training as a guide;
- d) If ACM are disturbed during the works, then persons must stop work and, if necessary, follow the emergency response procedure identified in Section 6.0;
- e) After the area has been cleaned, the Capital Works Manager must ensure that the Asbestos Register and BADGER are updated to show the extent of removal of ACM.

4.0 Managing ACM

Managing ACM under the Regulations involves assessing the risks of exposure, deciding on the correct action to take to avoid this, and monitoring the condition of ACM while they remain in place. Monitoring is intended to avoid the risk of exposure to airborne fibres released from ACM that have been left in place because they were initially assessed as low risk but which subsequently deteriorate or are damaged.

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

- a) **Priority Risk Assessments** will be completed for all known ACM on the BADGER asbestos database using a scoring method based on the algorithm in Appendix 4 HSG 264 Asbestos: The Survey Guide;
- b) The **Material Assessment** and **Priority Assessment** scores will be added together for each known ACM to produce a **Risk Assessment** score, and this entered in a field on the BADGER asbestos entry;
- c) Annually the Capital Works Manager will obtain a list from BADGER of all ACM present in University buildings, ranked by their **Risk Assessment** score;
- d) Working from the highest scores down, a risk based report will be produced by the Capital Works Manager to allow a decision to be made in the case of each ACM listed, whether:
 - i. No action is required;
 - ii. Protection or enclosure is required;
 - iii. Sealing or encapsulation is required;
 - iv. Repair is required;
 - v. Removal is required.
- e) The Capital Works Manager will draw up a list of all known ACM allocated to each one of these five categories and arrange for the actions to be carried out as necessary for every ACM under categories ii-v;
- f) **Monitoring (actions i – iv)**
 - i. The inspection frequency for ACM or groups of ACM will be carried out annually; OR following significant changes to the use of the premises which may impact on identified ACM;
 - ii. Trained Maintenance staff will also carry out monitoring of ACM by means of a visual inspection and report any defects or concerns to the Capital Works Manager

- iii. If an ACM shows signs of damage, a new decision will be made on the remedial work required (see d (iv) above);
 - iv. The Capital Works Manager will ensure this information is recorded on the Badger Database;
- g) **Remedial work (actions i-iii)**
- i. Where licensed remedial work is required, the Capital Works Manager must be consulted to oversee that a licensed asbestos removal contractor or other suitably qualified person is selected to do the work;
 - ii. Working methods must meet general requirements for asbestos removal work requiring a licence, and as a minimum standard the methods described in the task guidance sheets listed in HSG 210, the Asbestos Essentials Task Manual;
 - iii. For further details, see the section 9 below on asbestos removal work;
- h) Once this work has been done, details will be passed to the Campus Planning & Database Officer to update the Asbestos Register and BADGER. This will be monitored by the Capital Works Manager
- i) If the removal is urgent, if necessary, follow the emergency response procedure identified in Section 6.0;
- j) In each case, where some action needs to be taken to prevent exposure because the ACM condition has deteriorated, removal or repair action must be indicated, and the list of ACM that require action passed to the Capital Works Manager for inclusion in a repair/removal programme.

5.0 Updating Information on Asbestos

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

All University buildings were surveyed in December 2012 and January 2013 and the survey reports form the Asbestos Register. Any demolition or dismantling work will normally require a Refurbishment and Demolition Survey to be carried out to ensure that ACM that may be hidden beneath the surface of building fabric, or within plant or equipment, for example, are not disturbed.

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

- a) Updating information on BADGER and the Asbestos Register will start with either a Management or Refurbishment and Demolition Survey, a bulk sample of suspect material, a clearance certificate or certificate of re-occupation, depending on whether the building or part of it is being surveyed for ACM, or known ACM are being removed;

- b) The Project Officer will normally issue a certificate of practical completion at the end of the project, and pass the project drawings to the Capital Works Manager, who in turn will ensure the information is entered by the Campus Planning & Database Officer;
- c) The Maintenance & Support Manager will also pass the file to the Capital Works Manager, who in turn will ensure that the information for small, non-tendered projects is entered by the Campus Planning & Database Officer. The Campus Planning & Database Officer will be advised by the Capital Works Manager of any asbestos identification removal or encapsulation on a weekly basis and will update records accordingly;
- d) The information on file will fall into one of three categories:
 - i. Known ACM that have been removed to allow the works to proceed;
 - ii. ACM discovered during the works and removed;
 - iii. ACM discovered during the works and left in place.

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

6.0 Emergency Response When ACMS Are Damaged

This section deals with how employees and contractors should respond when they damage ACM during the course of their work. The aim here is to avoid exposure to airborne fibres and minimise contamination of the area until a licenced asbestos removal contractor can be called to clean up any debris.

- a) All persons in the area **must** stop work immediately and the area closed to access;
- b) Other people must be prevented from entering the area;
- c) If any person has got dust or debris on their clothing or overalls, they must remove these and place them in a plastic bag, find facilities to wash or shower as soon as possible, and leave the shower/washroom in a clean state;
- d) The incident must to be reported immediately to the Head of Campus Planning & Development, Capital Works Manager, Campus Services Project Officer or Team Leader, and the Head of Health and Safety;
- e) The Capital Works Manager will arrange for a bulk sample to be taken of the damaged material;
 - a. If the bulk sample confirms that the material does contain asbestos, then a licensed asbestos removal contractor will be contacted by the Capital Works Manager, to repair it or remove it, together with any debris. This work will be supervised by an independent asbestos analyst and a certificate of re-occupation obtained prior to work recommencing;

- b. The information will then be sent to the Campus Planning & Database Officer and administrative staff to update the Asbestos Register and BADGER and;
- c. the Director of Marketing or his nominated deputy should be informed of the situation

7.0 Out of Hours Arrangements - Emergency Response

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

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

All emergency response contractors must report to the main security office to sign in and collect keys.

The Security Team will be responsible for ensuring that before keys are given out to any contractor or member of staff coming on site to respond to an emergency, that the relevant Asbestos Register is consulted (see note below concerning Coach Lane campus void properties).

The Contractor or member of staff will then sign a duplicate register sheet to acknowledge they have been informed of the content of or have actually consulted the register. A copy of this must be forwarded to the Capital Works Manager as soon as is practical.

8.0 Coach Lane Campus

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

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

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

The Contractor or Maintenance Operative will then sign a duplicate register sheet to acknowledge they have been informed of the content of the register. A copy of this must be forwarded to the Capital Works Manager as soon as practical.

If it is identified in the register that ACMs have been identified in that area the Capital Works Manager must be consulted prior to work commencing.

In the event that no ACM have been identified then the procedure in section 3.3 of this policy must be followed.

Similarly, in the event of ACM being damaged during the course of the work then the procedure in section 6 of this policy must be followed.

For void and mothballed properties at Coach Lane Campus permission to enter for any reason must be sought from the Capital Works Manager or Health, Safety and Sustainability. Out of hours telephone numbers are held by security.

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

Campus Services agreed method of work involving asbestos removal is to employ a Licensed Asbestos Removal Contractor (LARC) for all work on licensed activities, and to monitor their work through the services of an independent asbestos analyst. The analyst will act as supervisor of the work being carried out by the LARC; and must agree the plan of work submitted to the Health & Safety Executive North East Area Office, monitor the work on site, as well as conduct various air sampling tests.

The analyst operates in the University's interests and for this reason, it is important that the analyst is contracted directly to Northumbria University's Campus Services.

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

- a) Be present at the smoke test to witness that the enclosure does not leak, that the equipment specified in the contractor's method statement is present and has a valid test date;
- b) Check that operatives are wearing their personal protective equipment (PPE) and using controlled wetting techniques if specified in the method statement, using the vision panels in the enclosure;
- c) Obtain confirmation from the analyst that the enclosure is clean;
- d) Make a visual check of the area for ACM and debris after the enclosure has been removed. If assistance or training is required to carry out these tasks you should consult the Head of Health, Safety and Sustainability.

This work can be done by Campus Services staff that have completed and passed the P405 Management of Asbestos in Buildings course, or alternatively, included as part of the service delivered by the asbestos analyst, as necessary.

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

References:

1. The Control of Asbestos Regulations (CAR) 2012
2. The Management of asbestos in non-domestic premises, Approved Code of Practice and Guidance, L127 (HSE)
3. HSG 264: Asbestos: The Survey Guide.
4. HSG 210: Asbestos Essentials: A Task Manual for Building, Maintenance and Allied Trades of Non Licensed Asbestos Work.

Appendix 1

Asbestos Management Policy Appendix: Communications Strategy

Northumbria University and its service providers are committed to providing a safe and healthy workplace and as responsible organisations aim to be open and responsive in the management of Asbestos Containing Materials (ACM).

If ACM are discovered in premises, staff working in the vicinity should be reminded face-to-face by managers that:

In general:

- A person can only be exposed to asbestos if the fibres are disturbed into the air and inhaled;
- Best practice is for ACM in good condition to be left in place and monitored;
- Any exposure to asbestos must be avoided and that the risk increases as the level, duration and frequency of exposure increases ;
- The increased risk to health from a one-off accidental exposure is negligible and not normally a cause for concern;

And they will be reminded specifically that:-

- Procedures are in place should they find ACM or a damaged ACM, or which they think could be ACM;
- Procedures are in place to ensure that the presence of ACM is checked prior to any activity, maintenance, or building work commencing.

Once this has been carried out, it is recommended that Northumbria University or its service provider arranges for relevant staff to attend a session where the points are described in more detail with an opportunity for a question and answer discussion. **Maintenance, building operatives and Facilities Services Assistants** will attend a specially-arranged session where the points listed below are described in detail with a question and answer discussion:

- What ACM products are and where they are likely to be found;
- That they should never work on any building material without first knowing whether it is ACM or not;
- the procedure to follow before starting any work where building materials are disturbed
- the safe working methods for working on ACM;
- What work they can and cannot do on ACM;
- Interpreting information given to them via the register or database.

Discovery of Suspected ACM

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

Discovery of Damage to Known or Suspected ACM

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

NB

The Director of Marketing or his nominated deputy should be informed of the situation.

Appendix 2

Campus Services Asbestos Management Working Group

Andrew Mowbray	Head of Campus Planning & Development (Chair)
Lesley Salkeld	Head of Health, Safety and Sustainability
Dave Ballantyne	Maintenance and Engineering Manager
Simon Willis	Capital Works Manager (Deputy Chair)
Jennifer Burns	Facilities Manager (City)
Nicola Cartwright	Facilities Manager (CLC)
Tony Symons	Compliance Officer