

# Asbestos Management Policy

## 1 Introduction

- 1.1 This policy forms part of, and should be read in conjunction with the University's Health and Safety Management Policy.
- 1.2 A breach of this policy may be addressed via the University's Code of Conduct and Disciplinary Policy and Procedure.
- 1.3 This policy will be reviewed by Estates and Campus Services on a 3-year basis or amended in response to changes in future legislation and/or case law.

## 2 Ownership

- 2.1 Estates and Campus Services owns and manages this policy on behalf of The University of Northampton.

## 3 Organisational Scope

- 3.1 This Policy applies to all University owned buildings and other buildings not owned by the University, for which the University has tenancy obligations to manage asbestos.
- 3.2 This policy applies to all premise, equipment and activities falling, to any extent, under the University's control in relation to asbestos.
- 3.3 All employees of the University of Northampton and contractors are expected to abide by this policy and associated protocols regardless of their hours of work, or the length of their contract.

## 4 Definitions

- 4.1 **Asbestos:**  
'Asbestos' is the general term used for the fibrous silicates. Three main types of asbestos were commonly used in construction:

- Crocidolite (commonly known as blue asbestos)
- Amosite (commonly known as brown asbestos)
- Chrysolite (commonly known as white asbestos)

All forms of Asbestos are dangerous, but blue and brown asbestos are known to be more dangerous than white. Any material containing one or more of these fibrous silicates at more than trace amounts falls within this definition. The full list of fibrous silicates is given in the Control of Asbestos Regulations 2012 as:

- Asbestos Actinolite, CAS No 77536-66-4
- Asbestos Arunerite (Amosite), CAS No 12172-73-5

- Asbestos Anthophyllite, CAS No 77536-67-5
- Chrysotile, CAS No 12001-29-5 or CAS No 132207-32-0
- Crocidolite, CAS No 12001-28-4
- Asbestos Tremolite, CAS No 77536-68-6

4.2 **Asbestos-Containing Material (ACM):**

Any material containing asbestos fibrous silicates or mixtures of them.

4.3 **Asbestos Insulation Board (AIB):**

Building boards containing ACM's commonly used as fireproofing materials in wall boards, ceiling tiles, panels in fire doors, lift-shaft linings, soffits etc.

4.4 **Asbestos Management Plan (AMP):**

A detailed plan that sets out in detail how the University will manage asbestos on site.

4.5 **Asbestos Register (AR):**

An up to date record of the location and condition of the asbestos containing materials (ACM)'s or presumed ACM's.

4.6 **Duty Holder:**

Any person who has been designated a 'duty to manage asbestos' on behalf of the University. Regulation 4 of the Control of Asbestos Regulations states any duty holder is required to take particular steps to comply with the law.

4.7 **Licensed work with asbestos:**

Most 'higher-risk' work with asbestos must only be done by licenced contractor. Licensable work with asbestos is work:

- Where worker exposure to asbestos is not sporadic and of low intensity; or
- Where the risk assessment cannot clearly demonstrate that the control limit will not be exceeded i.e. 0.1 asbestos fibres per cubic centimetre of air (0.1 f/cm<sup>3</sup>) (averaged over a four-hour period); or
- On asbestos coating; or
- On asbestos insulation or asbestos insulating board where the risk assessment demonstrates that the work is not short duration work, e.g. when work with these materials will take no more than two hours in any seven-day period, and no one person works for more than one hour in that two-hour period

4.8 **Non-Licensed work with asbestos**

Short duration low risk work that does not fall within the requirements for licenced work with asbestos.

**Examples of Non-Licensed work:**

- Cleaning up small quantities of loose/ fine debris containing ACM dust (where the work is sporadic and of low intensity, the control limit will not be exceeded, and it is short duration work)
- Drilling of textured decorative coatings for installation of fixtures/fittings
- Encapsulation and sealing-in work on asbestos-containing materials (ACMs) that are in good condition
- To repair minor damage to AIB
- Work involving drilling holes in AIB (e.g. when installing shelving)
- Painting/repainting AIB that is in good condition
- Maintenance work involving plastic paint coatings, PVC floors, panels and sealing compounds
- On other materials containing asbestos (such as paints, bitumen, resins, rubber, etc) where the fibres are bound in a matrix which prevents most of them being released (this includes, typically,

aged/weathered AC)

#### 4.9 **Notifiable Non-Licensed work with asbestos (NNLW)**

All Non-Licensed work needs to be carried out with the appropriate controls in place. However, for some types of work, employers must meet additional requirements. This is known as Notifiable Non-Licensed work or NNLW, and requires the University to:

- Notify work with asbestos to the relevant enforcing authority
- Designate (identify) areas where the work is being done
- Ensure medical examinations are carried out
- Maintain registers of work (health records)

#### **Examples of Notifiable Non-Licensed Work with asbestos:**

- To remove asbestos insulating board as part of a refurbishment project
- Work involving asbestos insulation (e.g. repairing minor damage to a small section of pipe insulation where the exterior coating has been broken or damaged)

#### **Removal of**

- Asbestos cement products (e.g. roof sheeting) where the material has been substantially damaged or broken up (e.g. as a result of fire or flood damage)
- Asbestos cement products (e.g. roof sheeting) where the removal activity will mean that the material will be substantially broken up, creating significant quantities of dust and debris (e.g. 'dropping' an asbestos cement roof)
- Asbestos paper and cardboard products if not firmly bonded in a matrix

## **5 Policy Statement**

5.1 The University of Northampton will conform to the requirements of all relevant legislation in respect of the Management of asbestos as set out primarily in the **Control of Asbestos Regulations 2012**.

5.2 It is the University's policy to prevent exposure to the hazards associated with asbestos by developing and maintaining both an Asbestos Management Plan and Asbestos Register.

5.3 Where any air testing or sampling of asbestos is required the University will ensure that this is carried out by those competent and authorised by the United Kingdom Accreditation Service (UKAS).

5.4 The University will not intentionally conduct **Notifiable Non-Licensed Work** within its premise, but instead will appoint a Licenced Contractor to conduct the work on its behalf.

5.5 The University will manage, so far as is reasonably practicable, all asbestos containing materials (ACM)'s falling under its control in such a manner as to minimise the risk of any person being exposed to asbestos fibres. The University will aim to achieve this policy by:

- Identifying ACM within relevant buildings. Where it is not reasonably practicable to identify ACM, for example ACM that may be located in inaccessible areas, then the University will presume that asbestos is present and manage accordingly
- Risk assessing each identified ACM taking into account the likelihood, and the likely number of people that might be exposed, in the event of an uncontrolled release of asbestos fibres
- Implementing appropriate control measures to reduce the risk of exposure of people to asbestos fibres from each ACM. The following general principles will be applied

- Where ACM is assessed as being in good condition then this will generally be left in situ and managed
- Where ACM is assessed as posing a risk to health it will be, so far as is reasonably practicable, removed or encapsulated
- Where removal or encapsulation is not reasonably practicable then access to the ACM will be managed to reduce the risk of exposure as low as is reasonably practicable
- Implementing a system of monitoring of each remaining ACM at intervals determined by the risk assessment
- Carrying out a Refurbishment and Demolition survey as an integral part of the planning process for any refurbishment or demolition works carried out in University owned, managed or occupied premises
- Planning, managing, delivering and monitoring all work that could result in the release of asbestos fibres. In the case of works that involve the removal or encapsulation or other activities that will lead to the release of asbestos fibres, regardless of asbestos type, these will only be carried out by organisations licensed to carry out such works by the Health and Safety Executive (HSE)
- Devising and implementing emergency procedures to reduce the risk of exposure of people as low as is reasonably practicable in the event of an unplanned and/or uncontrolled release of asbestos fibres
- Providing suitable and sufficient information, instruction, training and supervision to employees and contractors to reduce the risk of uncontrolled release of asbestos fibres as low as is reasonably practicable
- Review this policy and any associated procedures at regular intervals, or following any uncontrolled release of asbestos fibres, to ensure that it is working efficiently and effectively

## 6 Responsibilities of Duty Holders

6.1 **The University** as an employer has a legal responsibility for the health and safety of its employees and others who may be affected by its undertakings.

6.2 The University has a duty to manage asbestos under the Control of Asbestos regulations 2012 (Regulation 4) as applicable. The dutyholder is the owner of the non-domestic premises or the person or organisation that has clear responsibility for the maintenance or repair of non-domestic premises, for example through an explicit agreement such as a tenancy agreement or contract. The extent of the duty will depend on the nature of that agreement.

6.3 **The Director of Estates and Campus Services** has responsibility for:

- Acting as a duty holder for Asbestos Management on behalf of the University
- The overall management of all asbestos matters associated with building fabric, services and infrastructure
- Ensuring that a University Asbestos Management Plan (AMP) is developed and implemented
- Identifying the appropriate role of Duty Holder in terms of the management of asbestos
- Appointing, and give notification of the appointment to the appropriate duty holder in writing prior to the commencement of their duties
- Ensuring that the Duty Holder is provided with suitable financial and technical provision to enable

them to discharge the duty for which they have been assigned so far as is reasonably practicable

6.4 **Head of Capital Projects and Estates Infrastructure** has a delegated responsibility to:

- Act as a duty holder for Asbestos Management on behalf of the University
- Manage the risk of asbestos on behalf of the University, and take all necessary steps to ensure the University is compliant with the law
- Make arrangements for suitable assessments to be carried out as to whether asbestos is or is liable to be present in the University premises in the form of surveys
- Ensure the University maintains a suitable AR which contains the findings of those surveys
- Ensure the University has a suitable AMP in place that is reviewed and revised at regular intervals
- Implement measures to be specified in the plan for managing the risk which must include adequate measures for
  - monitoring the condition of any asbestos or any substance containing or suspected of containing asbestos
  - ensuring any asbestos or any such substance is properly maintained or where necessary safely removed
- Notify the Director Estates and Campus Services to any breaches of the statute in regard to the accidental release of asbestos
- Complete relevant competency training in relation to the duty to manage asbestos

6.5 **The Safety, Health and Environment (SHE) Team** will:

- Advise where additional measures may be required to protect the health of individuals working in areas where ACB's are present
- Liaise with the Duty Holder as required on any matters related to asbestos
- Co-ordinate and record all communications with enforcing authorities such as the Health and Safety Executive and other external agencies
- Co-ordinate appropriate asbestos training on behalf of the University

6.6 **1<sup>st</sup> Degree Facilities** will have a duty to:

- Provide detailed information contained in the AR, to 1<sup>st</sup> Degree Facilities staff and contractors on the presence of ACM's in the vicinity of their intended works
- Ensure suitable controls are in place to manage the risks from asbestos when conducting or authorising intrusive works
- Issue permits to work as required

## **7 Associated Documents and references**

8.1 References that should be used in conjunction with this policy.

- Health and Safety at work act 1974
- The Management of Health and Safety Regulations 1999
- The Control of Asbestos Regulations 2012
- The Construction, Design and Management (CDM) Regulations 2015
- The University Asbestos Management Plan
- The University Asbestos Register
- L143: Managing and working with asbestos
- INDG 233 Managing Asbestos in buildings

8.2 There is no accompanying procedure for this policy, however the Asbestos Management Plan should be read in conjunction with this Policy.

## 8 Information, Instruction and Training

### Staff development-Training and Competence

- 8.1 All appropriate staff will receive training and instruction commensurate with their level of responsibility where necessary from UKATA accredited training providers.
- 8.2 Staff who have identified as requiring asbestos awareness training will be provided this as a minimum, and it will be the responsibility of Line Managers to determine who these staff are.

## 9 Approval Process

- Trade Union Liaison Group
- Health, Safety, Security and Environment Committees

## 10 Equality Analysis

An Equality Impact Assessment has been completed for this Policy.

## 11 Version Control

<b>Version Control</b>	V2		
<b>Author:</b>	Gary O'Rourke	<b>Approval:</b>	TU Liaison HSSE
<b>Date written:</b>	October 2019	<b>Updates:</b>	
<b>Current status:</b>	Final Approval at HSSE		
<b>Final</b>	Jan 2020		
<b>Record of Amendments</b>			
<b>Date</b>	<b>Details of Change</b>	<b>Approval</b>	
October 2019	Full Policy review	HSSE	