LONDON METROPOLITAN UNIVERSITY

Asbestos Policy and Management Plan

Document Control Information	
Version control	4.2
Owned by:	Health and Safety Team
Latest amendment on:	01/04/2025
Approved by:	Health and Safety Committee
Approved on:	07/05/2025
Coming into effect on:	07/05/2025
Review date:	June 2026

Contents

Introduction

This policy sets out how London Metropolitan University (London Met) deals with the management of health, safety and welfare as required under the Health and Safety at Work etc. Act 1974. This asbestos policy and management plan is set within the framework of the 2012 Control of Asbestos Regulations.

This policy and the management plan is specific to London Metropolitan University and aims to ensure that all known or presumed asbestos containing materials (ACM's) are managed effectively to prevent exposure to the hazards associated with asbestos.

Aims and Objectives

The purpose of the Asbestos Policy and Management Plan is to:

- Ensure a health and safety culture is established in London Met so that legal requirements are met, and all stakeholders affected by our activities are able to go about their work or study in a safe and healthy way.
- To set a framework for planning, delivering, monitoring and reviewing London Met's Asbestos Management Plan.

There is no requirement to remove asbestos where it does not pose a risk to health; however, the aim is to remove asbestos, where practicable, from all London Met's properties. This may take up until the lifetime of the building to do so or it may be removed as part of a refurbishment or demolition.

Policy Statement

Asbestos is a common naturally occurring mineral that proved very popular as an industrial and commercial raw material. The fibres that make up this mineral are also known carcinogens and have proven lethal for thousands of workers who inhaled them while working with or around asbestos products. Three main types of asbestos were commonly used.

- Crocidolite (blue asbestos)
- Amosite (brown asbestos)
- Chrysotile (white asbestos)

The Health and Safety at Work etc Act 1974 requires an employer to provide a safe workplace. Work with asbestos is covered by its own set of regulations – **The Control of Asbestos Regulations** (CAR 2012).

Under **Regulation 4** of the **Control of Asbestos Regulations** (CAR 2012) owners and occupiers of non-domestic premises, who have maintenance and repair responsibilities for those premises, are required to identify the location and condition of asbestos and to manage the risk to prevent harm to anyone who works on the building or occupies it. Contractors and occupiers have a duty to co-operate with London Met to enable them to comply with the regulation.

London Met acknowledges its statutory duty under Regulation 4 of the Control of Asbestos Regulations 2012 (the duty to manage asbestos in 'non-domestic premises' and the serious risk to health and safety caused by exposure to asbestos containing materials). Non-domestic premises cover all commercial situations such as university buildings. The regulations require effective management systems to be in place to control the hazard and reduce the risk of exposure to asbestos as far as is reasonably practicable.

A written plan identifying where that asbestos is located has been prepared and sets measures to manage the risk from the asbestos and it describes how they are being implemented. Other parties have a legal duty to co-operate with the duty holder.

The plan sets out the general principles under which London Met will safely manage asbestos containing materials (ACMs) within their property portfolio. It communicates arrangements for the management of ACMs within London Met's owned or managed properties; informing all relevant parties of the resources and processes employed and to enable checks to be undertaken to confirm that they are carried out in practice, suitable, adequate and effective.

In addition to the Control of Asbestos Regulations, a number of other codes of practice and guidance notes are applicable to works involving asbestos, as follows:

Managing and Working with Asbestos (ACOP L143)
http://www.hse.gov.uk/pubns/books/l143.htm
Asbestos: The licensed contractor's guide (HSG 247)
http://www.hse.gov.uk/pubns/books/hsg247.htm
Asbestos: The analysts' guide for sampling, analysis and clearance procedures (HSG 248)
http://www.hse.gov.uk/pubns/books/hsg248.htm
Asbestos: The Survey Guide (HSG 264) http://www.hse.gov.uk/pUbns/priced/hsg264.pdf
A comprehensive guide to the management of asbestos (HSG 227)
http://www.hse.gov.uk/pubns/priced/hsg227.pdf
Asbestos Essentials (HSG 210) http://www.hse.gov.uk/pubns/books/hsg210.htm

The hyper-links give access to the most up to date version of these documents directly from the HSE website.

London Met wish to ensure, the risk presented from asbestos within properties managed by them, is minimised so far as is reasonably practicable.

Roles and Responsibilities

1. **Board of governors**

The board of governors of London Met has ultimate responsibility for ensuring that all staff, volunteers, students, contractors and others likely to be affected by our activities, are able to work and study in a safe way in our buildings.

2. **The Vice Chancellor and Chief Executive**

- Has overall responsibility for ensuring the requirements of the CAR 2012 are met

- Ensures that a competent person is appointed for advising and monitoring of the management of asbestos.

3. **The Health and Safety Committee**

The Health and Safety Committee chaired by the Deputy VC (Business Development) is the responsible for ensuring policy setting and its enactment by regular audit and monitoring to include:

- Ensuring this asbestos policy and management plan is regularly reviewed and all works and management procedures reflect it.
- Auditing asbestos data on a regular basis for quality assurance purposes.

4. **The Director of Estates**

The Director of Estates has responsibility to ensure that the CAR 2012 and other relevant legislation and guidance are complied with, and will in person or through delegated responsibilities to the Associate Director of Estates (Operations) and Associate Director of Estates (Development) as supported by the Head of Estates Operations and Estates Senior Infrastructure Manager:

- Ensure surveys are conducted when and where required in accordance to HSG 264.
- Ensure re-inspection of asbestos items are conducted correctly.
- Ensure that contractors are competent and follow London Met policies.
- Ensure asbestos information has been updated on the London Met asbestos register.
- Provide staff, contractors and students with asbestos information as required.

4. Associate Director of Estates (Operations)

- Shall ensure that the Building Asbestos Manager has sufficient time, resources and support to complete their duties under this policy.
- Shall ensure that the duties of the BAM are undertaken by a suitably competent replacement or deputy should the BAM become unavailable.
- Ensure that all of their team members are sufficiently competent to undertake duties assigned to them in relation to this policy and plan.
- Provide assurance that the duties of their team members are completed to a satisfactory and timely manner.
- Ensure that suitable and sufficient management systems are in place and implemented to support the requirements of this policy and plan.
- Ensure the effective contract management of the London Met approved asbestos consultancy.

5. **Associate Director of Estates (Development)**

- Provide assurance that all estates projects have established and are implementing suitable management and communication arrangements for the control of asbestos containing materials affected by the project.

- Ensure an appropriate and timely flow of information relating to ACMs within the projects and to all appropriate stakeholders.
- Ensure that all team members are suitably competent and are undertaking their duties satisfactorily in relation to this policy and plan.

6. **Head of Health and Safety**

- Assist the Director of Estates in the implementation of the University Asbestos Policy and Management Plan.
- Provide advice and guidance on the implementation of this policy.
- Contribute to the monitoring of the Asbestos Management Plan by ensuring regular scheduled H&S audits (see Asbestos Management Plan section IIId).

7. **Estates Senior Infrastructure Manager (BAM)**

- Day-to-day responsibility for managing the control of asbestos, including organising asbestos condition monitoring in line with the asbestos risk assessment requirements and ensuring that any necessary remedial action is undertaken and organising record storage.
- Ensuring that the Asbestos Management Plan is delivered via appointed UKAS accredited Licensed Asbestos contractors.
- Ensuring that the control of asbestos is taken into account as part of maintenance works.
- Monitoring the performance of specialist asbestos contractors and informing the Director of Estates of any failures in performance so appropriate action can be taken.
- Keep, maintain and update an electronic copy of the asbestos register of the building portfolio (see Section III of the Plan below)

To ensure quality, the principal contractor/designer or BAM shall be satisfied that organisations carrying out asbestos surveying or removal works are:

- Competent to do so and have shown experience of similar works.
- Provided copies of up-to-date public liability insurance, professional indemnity insurance and employer's liability insurance, which will be passed to the insurance administrator and safely stored.

8. **Project Managers**

Project Managers (PMs) are responsible for ensuring that no work is undertaken that gives likelihood to the disturbance of asbestos containing material unless that work is carried out by a specialist contractor whilst fully complying with the Control of Asbestos Regulations 2012 and that the Building Asbestos Manager is informed of all details of the work. Refer to the Control of Works Policy for additional responsibilities of Project Managers and description of the role.

PMs must ensure that staff and contractors review the relevant asbestos information and ensure compliance with the following (by inspecting relevant records):

- A suitable project specific plan for the control of asbestos containing materials is in place including sufficient planning, control of information and approvals to proceed. This will include a review of any existing asbestos procedures in place by the contractor and an assessment of whether their procedures support this project specific management plan
- Staff and contractors undertaking any works are appropriately asbestos trained and representative training certificates of individuals are obtained.
- Supervisory staff and contractors have had full regard to the Asbestos Management Plan and have reviewed the asbestos registers and plans.
- Obtain Clearance certificate where required, according to the section IVb of the Asbestos Management Plan below.

Where weaknesses in the operating procedures of the contractor in relation to asbestos are identified, the contractor shall be invited to provide further proof of compliance as soon as practicably possible.

Follow Appendix 1 and Appendix 2 for planned and unplanned Asbestos works flow diagram.

No work can commence unless it has been confirmed by existing information or the undertaking of a task specific Refurbishment & Demolition Asbestos Survey.

In the event of uncertainty, or any lack of information with regards to the above works are **not** to proceed until written approval is obtained from the Building Asbestos Manager.

9. **Deans of School and Directors of Professional Service Departments**

Will ensure that all of their staff and students are aware of the risks associated with asbestos and take all necessary steps to protect from exposure.

In particular, they will:

Ensure any activity, which requires drilling or cutting into the building structure, by either contractors, school staff or students is approved by appropriate members of the Health and Safety or Estates teams before work commences

10. **London Met approved asbestos consultancy**

- Provide competent advice as required.
- Oversee asbestos related works only on behalf of the London Met where requested.
- Carry out Refurbishment and Demolition Surveys as required.
- Organise and oversee sampling of suspected asbestos material.
- Provide “clearance” monitoring, after each and any work with potential ACMs.
- Provide relevant training for London Met staff when requested to do so.
- Carry out reassessment surveys at regular intervals
- Provide written scope of works for any removal or remediation work noted in a survey that has been undertaken.
- Manage and upkeep of Asbestos Registers, following survey, sampling or remediation works.

- Emergency support – which may be out of hours and include sample collection, air monitoring and advice.
- Deliver asbestos awareness training to key university staff.
- Conduct accreditation of other asbestos linked services provided by partnering or external contractors.

Whilst carrying out the above duties the Consultant(s) / Contractor(s) must:

- Ensure that their staff are competent.
- Be aware of their responsibilities to comply with the Asbestos Policy and Management Plan.
- Understand the reporting procedure in the event of an asbestos incident.

11. Contractors

It is the responsibility of any London Met (or nominated partner) or contractors' manager or officer involved in commissioning works to property to check the asbestos register prior to any type of work commencing, including major works, cyclical works, heating installations, electrical installations, all refurbishments and minor works or repairs.

Approval for works by the PM will only be given where there is evidence that relevant asbestos survey information is available and has been taken into account in the preparation of risk assessments and method statements. The details must relate directly to the works and it is essential that a refurbishment/demolition survey is obtained, where management information is not specific to the task being planned. Whenever a full survey is available, it must be read in full, including all caveats and limitations.

If asbestos material exists which may be affected by the intended works then the principal contractor/designer shall consider the need for further survey work, removal works or other measures. **Contractors shall include the information in the method statement and risk assessment for the works and provide a specific asbestos work plan.**

If the London Met Asbestos Register holds an asbestos survey/risk assessment for the building/room affected by the intended works and the survey indicates that there is no asbestos or suspected asbestos present, this information should be included in the contractor's method statement and risk assessment.

NOTE: absence of asbestos materials within any survey report does not guarantee that there is no asbestos present. Caveats and limitations of asbestos surveys will always be fully considered and if works are to proceed - then it is with caution. **All site operatives must have received asbestos awareness training.**

Any instructions to contractors must include a statement: the absence of information on asbestos does not guarantee asbestos is not present in the area and reasonable precautions must be undertaken to safeguard employees and students.

No sub-contractor may be employed by any other contractor, unless explicitly authorised by London Met**.** No contractor's employee will be allowed to work on premises unless they have

been explicitly authorised to do so either by London Met or by their own employer depending upon the terms of their employer's own authorisation.

In addition to above, see section IVa of the Asbestos management Plan below.

12. **Staff and students**

Staff and students are not to disturb building fabric and report building defects via Estates Helpdesk ask@londonmet.ac.uk. If suspecting disturbed asbestos, please immediately report your finding (location and description) to BAM (Paul Ayles 07887831741) or call a member of H&S team: https://staff.londonmet.ac.uk/employment-support/health-and-wellbeing/health-and-safety/

The BAM will provide on request of staff or students, information on asbestos within London Met properties.

Communication

As part of London Met's commitment to open communication, we will keep all relevant parties informed about known asbestos materials, and ensure roles, in relation to asbestos, are clearly defined and these procedures are widely distributed in a suitable format.

All contractors working on London Met properties shall have received a copy of this policy and management plan in PDF format as a part of the pre-contract documentation, sent by email by the responsible person. Updates to this management plan will also be sent in a timely fashion.

It is the responsibility of the BAM (supported by the Health and Safety Team) to inform the Dean of School, Directors and Heads of other organisations using London Met buildings of any circumstances that have a bearing on the effective management of asbestos containing materials. Upon notification of such changes, it will be the responsibility of the Dean/Director/Head to provide the information provided by the BAM to their staff and students.

Training

Training is a specific requirement of Regulation 10 of the Control of Asbestos Regulations 2012.

Any London Metropolitan university staff, or any contractor or visitor who are likely to come into contact with any ACM's during their usual work must all undertake general asbestos awareness training to cover:

- Understanding the use of asbestos in buildings
- General identification of asbestos materials
- The health risks posed by asbestos
- How to avoid exposure
- Action to be taken on finding suspected asbestos containing materials
- Understanding the university's asbestos registers

The aim of asbestos awareness training is to create an open and responsive culture where employees are not afraid of asbestos and know how the university manages it in their place of work.

The Director of Estates will ensure that at least two of the Asbestos Management team hold BOHS P405 Management of Asbestos in Buildings or equivalent.

The Learning and Development Team will facilitate all relevant training and maintain records.

Monitoring and reviewing

This policy and management plan and associated documents will be reviewed periodically to ensure that it continues to prevent uncontrolled work on ACMs. A review of the on-going suitability, adequacy and effectiveness of the Asbestos Management Plan is undertaken at least annually. More frequent reviews will be undertaken whenever warranted e.g. whenever there is a significant change to the structure of the organisation, legislative or regulatory change, the personnel responsible for its implementation or changes in building use/ occupancy or refurbishment plans. Relevant people are notified where revisions have been undertaken.

Arrangements for auditing of Asbestos register are described in section 3d below.

Asbestos Management Plan

I. Identification of asbestos containing materials (ACM's)

Each London Met building has an individual asbestos register, detailing the location, type and risk factor of each identified or presumed asbestos containing material. These risk factors are based on a material assessment and a priority assessment of each individual ACM.

The asbestos registers have been compiled from management surveys and refurbishment and demolition surveys undertaken by consultants in accordance with HSE guidance document HSG 264.

a. Management Survey

This type of survey aims to identify all of the easily accessible items found in premises. It identifies all the materials that could be easily disturbed during the normal occupancy of the premises. It considers light maintenance work (changing lamps, checking above suspended ceilings, accessing roof spaces etc.) and while sampling may be taken if easy to access, it is not a destructive or intrusive survey.

b. Refurbishment & Demolition Survey (R&D)

This type of survey needs to be undertaken before any intrusive or disruptive works are carried out in a building. It's aim is to locate and identify all asbestos containing materials that may be within the fabric of the building and not normally accessible or even visible

during normal occupancy. This is an intrusive / destructive survey where the surveyor is likely to damage the fabric of the building to see what materials may be hidden below (i.e. making holes in walls, floors or ceilings to ascertain what materials are in the construction of the building).

Throughout 2018, London Metropolitan University carried out management surveys to all it's buildings. This information was then combined with the results of R&D surveys that had been undertaken during various project works and complied into the universities asbestos registers. Each building or block has its own register, detailing each space within the building and the results of the surveys in each location. These registers are held on SharePoint and are available for all staff to view.

All surveys must be conducted in accordance to HSG 264, by UKAS accredited London Met suppliers. The London Met appointed consultancy (or by others approved by them) will be used in all cases. All bulk samples will be taken in accordance to both HSG 248 (chapter 4) and HSG 264. All analysis will be by a laboratory accredited by UKAS to ISO17025. These activities will be project managed by London Met or their approved asbestos consultants.

All recommendations for remedial actions will be reviewed and approved by the BAM in consultation with the Health and Safety Team. Assessment for remedial actions will be conducted by reference to HSG 277 'A comprehensive guide to the management of asbestos' and any other factors specific to each individual ACM deemed relevant by the surveyor.

Appendix 3 outlines the flow diagram for conducting the R&D survey.

To request an R&D survey, email to the University's appointed asbestos consultancy, their contacts can be obtained from the Estates Business Partner or via the Estates Helpdesk. Please cc the Estates Senior Infrastructure Manager into all correspondence.

Before the survey is undertaken please ensure the University's asbestos consultant is provided with as much of the information listed below as possible, to ensure that the survey undertaken will provide the relevant information for your project:

- Building
- Area / Location / Room Number of work area(s)
- Detailed plan or scope for the work being planned
- Any unusual features, underground sections
- Any plant or equipment installed
- Details of whether the building is listed
- Extent or scope of the survey required
- Inclusion of external areas or additional buildings
- Current plans or drawings of the site
- Whether the building is vacant or occupied
- Restrictions regarding access
- Special requirements or instructions

c. Site specific hazards

- Responsibility for isolation of services, power, gas, chemical etc.
- Working machinery, plant or lifts which need to be made safe
- The location of services, ducts, plant rooms, risers and lift shafts
- Copies of any previous surveys
- Copies of the current asbestos registers and records regarding removals or repairs
- Information on possible repairs to ACMs

II. Risk Assessment of identified materials

Just like a normal Health and Safety risk assessment each identified ACM is subjected to an assessment of risk. This is a two-stage process. The first is a material assessment looking at the nature and condition of the material found. The second is a priority assessment looking at the likelihood of the material being disturbed. Each of these assessments is given a score; these two scores are then added together to give a total risk score for each identified ACM.

a. Material Assessment

The material assessment looks at the type of asbestos identified and the condition of the material. HSG264 recommends the use of an algorithm to carry out the material assessment; the algorithm assesses four parameters to determine the risk:

• Product Type
• Extent of damage
• Surface treatment
• Type of asbestos

b. Priority Assessment

The priority assessment looks at the likelihood of the ACM being disturbed. It too takes in four parameters:

• Normal Occupant activity (What is the space used for)
• Likelihood of disturbance (How big the space is and the quantity of material)
• Human Exposure Potential (How many people usually occupy the space)
• Maintenance activity (The frequency and disruptiveness of normal maintenance activities)

The resulting risk score enables the management of asbestos containing materials to be prioritised according to risk. Some may require immediate action while others are safe to leave in situ and manage on an ongoing basis.

III. Collection and storage of information – asbestos registers

The **Estates Senior Infrastructure Manager (or deputy – Head of Operations) in their role as the Buildings Asbestos Manager (BAM)** will ensure that London Met managed and occupied premises are formally assessed for asbestos containing materials (ACMs). The BAM will keep and maintain an electronic copy of the asbestos register of the building portfolio:

SharePoint \ Health and Safety Managed \ Health and Safety \ Asbestos \ 03. Asbestos Registers

This system allows up-to-date information on asbestos to be accessible via the intranet to all staff and contractors requiring access. The information should include copies of survey reports, air monitoring sheets and consignment notes.

a. Responsibility for updating the register

Asbestos registers are maintained by the appointed consultancy. The **Estates Senior Infrastructure Manager** (BAM) (or one of their team) will be responsible for updating the asbestos register.

This should be done each time a new survey is carried out, remedial or removal works are undertaken, new ACM's have been identified by bulk sampling or annual management activities are undertaken.

It will be the responsibility of each **project manager or person in charge of any works** involving asbestos containing materials to pass on the relevant information to the BAM to ensure that the registers can be kept accurate. In the instance of project works, it is vital that at the end of the project a detailed description of all asbestos works is provided. This should detail exactly what remedial works have been undertaken and specifically detail any asbestos containing materials that are still present after the works, their location, condition, and any relevant management information. Payment to asbestos contractors or consultants may be dependent on receipt of this information.

b. Provision of information for asbestos registers

All maintenance staff and contractors must be provided with details of any known asbestos materials in their area of work. This will be achieved using the asbestos registers. Small works check list also contains a section on asbestos safety.
For major refurbishment projects, in addition to the requirement for prior notification, it is the responsibility of the Project Manager to liaise with the Estates Senior Infrastructure Manager and Health & Safety team to provide and collate all necessary information.

Where the Construction (Design and Management) Regulations 2015 require the production of a pre-contract information document, all relevant information on the presence of known asbestos containing materials must be included. If this information is not available, a refurbishment & demolition survey must be commissioned.

c. Labelling of asbestos containing materials

Where asbestos materials have been identified or presumed, they shall be labelled with a standard asbestos warning label (shown below). The absence of a warning label should NOT be taken as proof that asbestos is not present.

d. Auditing of information

The Health and Safety Team, to check that the London Met Asbestos Register is being kept up to date, will undertake annual active monitoring. The monitoring shall include interrogation of the register to ensure that any works that would change the status of ACM have been recorded and the risk assessments and management guidance amended accordingly. The accuracy of data entry will also be checked, during the monitoring process.

Results of the monitoring exercise will be included in reporting to the Health and Safety Committee.

IV. Procedures for working on asbestos containing materials

All work with asbestos containing materials shall be carried out in accordance with the requirements of the Control of Asbestos Regulations 2012 and will only be undertaken by licensed asbestos removal contractors.

Prior to any asbestos works being undertaken, London Metropolitan University will issue the contractor with all asbestos register and site survey information and a brief of the work to be undertaken. The contractor will then supply a specific asbestos work plan and issue this to the University or its representative for approval.

a. Asbestos work plan

Before any works on ACM's are undertaken, the **contractor must provide** a detailed asbestos work plan, which should include:

- Details of the area where the works are being undertaken
- Reference to the asbestos register, survey, or sample that the work is based upon.
- Scope of the works (Remove, encapsulate etc.)
- Program of work
- Copy of the notification to HSE where required (ASB5 for licensed works and ASB NNLW1 for notifiable non licensed work)
- Proposed method of removal (where appropriate)
- Waste disposal and consignment note information
- RPE and PPE for operatives
- Air monitoring procedures (where appropriate)
- Emergency procedures
- Expected duration of work
- Location of decontamination unit (where appropriate)
- Waste transfer route and location of waste skip

As with other contactor works, on request from the Project Manager the Health and Safety Team will review the risk assessments and method statements, deferring to the London Met appointed asbestos consultants, as required.

b. Completion of licensed work

Before the enclosures are dismantled, the London Met **Project Manager** will arrange for an independent four-stage clearance to be carried out by the university preferred consultancy and issue the university with a Certificate of Reoccupation.
Upon completion, the person responsible for the work must ensure that they receive a copy of the Certificate of Reoccupation. This document is essential in order to deem the area fit for reoccupation.
The person responsible for the work should also ensure that they receive the following:
- Copy of the ASB5 HSE Notification
- Air Test Certificates
- Hazardous Waste Consignment Note
- Detailed record of removed ACM's and any remaining ACM's

All these documents should be passed to the Estates Senior Infrastructure Manager.

c. Asbestos removal and remediation

The licensed asbestos removal contractor and air monitoring analytical consultancy will be accountable to London Met for ensuring full and strict compliance with the Control of Asbestos Regulations 2012 and approved code of practice and guidance. The licensed asbestos removal contractor will prepare specific risk assessments as required under CAR 2012 and ACoP L143. This risk assessment should be included within their plan of work and submitted for approval to the principal contractor/designer or BAM. Additionally, the licensed asbestos removal contractor will issue the statutory 14-day notification to the Health and Safety Executive when required.

If the principal contractor/designer or BAM deems the works as being of a complex nature, then a pre-start meeting will be arranged to discuss the works and the precautions to be undertaken. The London Met approved asbestos consultancy, Health and Safety, Estates and School(s) concerned should be represented.

During the course of the works, the principal contractor is to ensure that the work completed in accordance with the agreed plan of works.

Plans should include the following

- Details of the scope of the work
- Relevant details from the contract for the work;
- Equipment, materials and controls
- Other relevant site-specific information
- Method of work
- Management arrangements

d. Documentation

Upon completion of any remedial works, the licensed asbestos removal contractor shall provide to the principal contractor a number of documents who will in-turn provide this to the BAM for incorporating into the Asbestos register.

For licensed removal work, this will include:

- Method statement or risk assessment for the works
- Four-stage clearance paperwork or certificate of re-occupation
- Waste Consignment Note
- Works monitoring documentation

For non-licensable works, documentation will include:

- Method statement or risk assessment for the works
- Works Completion Certificate
- Waste Consignment Note

e. Monitoring of asbestos containing materials

The condition of any ACM's left in situ must be monitored on a regular basis and the results recorded in the register. Remedial actions must be taken if it is found that the condition of any ACM begins to deteriorate. The frequency of monitoring will vary dependent upon the risk posed by the ACM and will normally be determined by the university's asbestos consultant.

Monitoring is undertaken by the university's asbestos consultants and will consist of a visual inspection looking for signs of disturbance, scratches, broken edges, cracked or peeling paints and debris. Where deterioration has occurred recommendations for appropriate action will be made by the consultants.

The BAM (supported by the Health and Safety Team and/or the London Met appointed Asbestos consultancy) will decide on appropriate action.

f. Non licensed works

Non-licensed works will only take place at the specific request of the BAM and with the agreement of the Health and Safety Team. Before work commences detailed risk assessment and method statements (reflecting HSE guidance), will be produced by the contractor. These must include specific information about operatives: training, personal protective equipment, health monitoring and insurance. Waste disposal will be in line with the regulations and copies of consignment notes must be supplied to the BAM.

Recommendations and Timetable for Action

It should be noted that for the purpose of this management plan, all requirements are based on the materials and priority assessments added together.

1. **No Asbestos Detected**

These areas require no further monitoring or inspection, however it is vital that areas outside of the survey scope are taken into consideration, for example even after a management survey has found no asbestos to be present, further assessment may still be needed if the fabric of the building is to be altered, or demolished, etc. In addition, it should be noted that no survey can categorically state that no asbestos is present within the fabric of a building given that limitations exist within all survey work.

2. **Areas Yet to Be Surveyed and Areas of No Access**

Surveys which have listed areas as “No access “, “Limited Access” or “Not surveyed”.

In some cases, the asbestos register for a site will indicate that no asbestos containing materials have been identified, but there was an area (wall, ceiling void, floor void, rise etc.) which was not accessible.

These areas, distinct from those, which would naturally fall outside of the survey scope, should be assumed to contain asbestos even if no other items are identified on the survey.

Essentially, where there is a lack of concrete information to the contrary, asbestos must be assumed to be present. An assessment must be carried out by a competent person prior to any access to, or disturbance of, these areas.

3. **Areas Which Contain Asbestos**

This category includes all presumed, strongly presumed and identified asbestos containing materials within the building. This information is held within the asbestos register for each site.

In turn, materials identified have been further categorised to aid the management of the risk posed from them.

a. High/Medium Risk Material

These materials have been given a risk assessment score that they present a medium to high risk, are a possible hazard to health in their current condition and should be treated

as a priority. It is probable that items are damaged, unsealed, or friable and require immediate remedial works to mitigate or reduce the risk posed.

Access to these areas should be centrally controlled or, where possible, restricted to ensure that no accidental disturbance of these materials occurs.

A systematic programme should be undertaken to reduce the risk posed by ACM's identified in this category. It is likely that the remedial options for these items will include either encapsulation or removal. Initial recommendations are given within the asbestos register.

b. Low Risk Materials

These materials present a low risk rating and are possible hazards to health in their current condition. It is likely that these items have some minor damage, or require encapsulation or labelling, or some minor remedial actions to stabilise their condition or prevent further deterioration.

Access to these areas should be centrally controlled or, where possible, restricted to ensure that no accidental disturbance of these materials occurs.

A systematic programme should be undertaken to reduce the risk posed by ACM's identified in this category. It is likely that the remedial options for these items will include either encapsulation or removal. Initial recommendations are given within the asbestos register.

c. Very Low Risk Material

These materials will have been given a very low risk rating and are unlikely to pose a significant risk to health in their current condition. Items should be inspected, and their condition assessed regularly. These items are likely to require minimal remedial actions.

Initial recommendations are given within the asbestos register and are likely to include measures such as labelling ACM's and keeping an up to date record of their location and condition.

4. Remedial work options

Remedial options will vary according to the risk assessment of the ACM.

Some low risk ACMs may be removed at the same time as removing ACMs with a high-risk rating. This has long term cost benefits. All remedial options are to be carried out by universities appointed licensed asbestos removal contractors.

The remedial options to choose from are:

a. Removal

If an ACM is damaged or asbestos debris or residues have been found, asbestos removal is the first option. If, due to the circumstances and nature of the room, an ACM cannot be removed immediately, it may be temporarily enclosed or encapsulated.

If an area is contaminated with Asbestos dust or debris, this must be removed. Asbestos identified in a refurbishment or demolition survey for a project must be removed if the area is due to undergo refurbishment or if a building is to be demolished.

b. Encapsulation

Encapsulation will take place where the asbestos is in a good condition and will not be damaged as a consequence of the encapsulation works.

Consideration must also be given to the fire-resistant properties of the PVA if it is to be used on an ACM, which provides fire protection.

c. Repair

Repair should only be carried out to an ACM if it is physically impossible to remove or encapsulate it.

5. **The Action Plan**

Asbestos remedial works are included in the project works planned according to the Estates strategy. In addition to these works, following actions are conducted regularly throughout the year:

- Refurbishment and Demolition surveys (Where required)
- Re-inspection of known asbestos.
- Update of Registers following any identification of asbestos and/or works to remove/ contain asbestos.
- Remedial work(s) based upon the asbestos remedial work packages (project dependant)

Incident Management

Asbestos Management Team includes Director of Estates, Head of Health and Safety, Head of Estates Operations, Estates Senior Infrastructure Manager.

1. **Procedure for reporting asbestos**

Any employee, student or contractor discovering or being made aware of the presence of previously unknown asbestos, damaged asbestos or fly tipped asbestos should:

- Phone or email the BAM or H&S Team without delay: 07887831741, p.ayles@londonmet.ac.uk and hands@londonmet.ac.uk

If BAM is not available, use the following escalation path:

1) Tony Dow – Head of Estates Operations – t.dow@londonmet.ac.uk (07506 857066)
2) Olga Kuzmina – Head of Health & Safety – o.kuzmina@londonmet.ac.uk (07950 634734)
3) Associate Director of Estates (Development) – Vacant
4) Matthew Brewster – Director of Estates – m.brewster@londonmet.ac.uk (07584 272310)

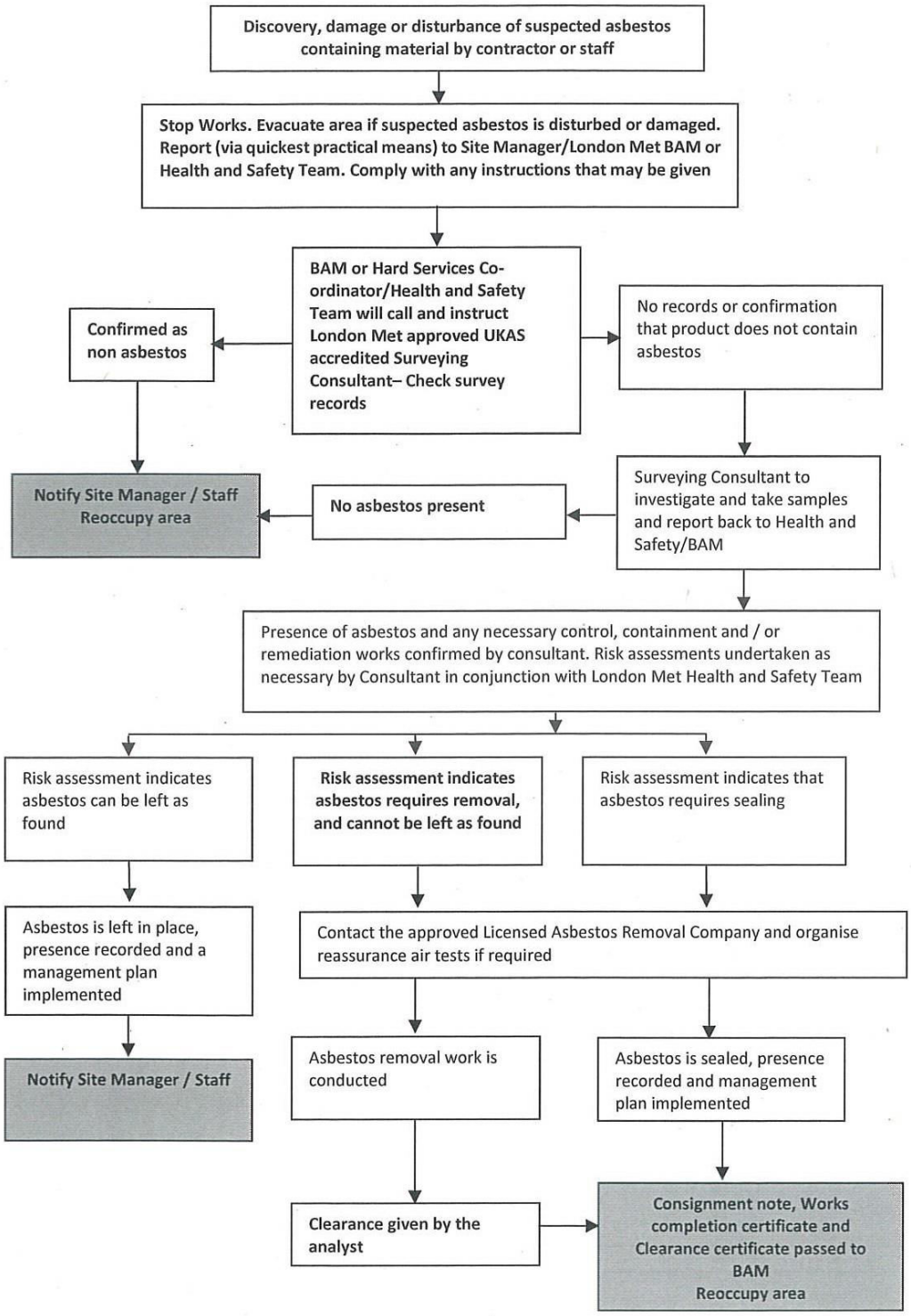
Give clear details of

- Who you are your name and your team.
- Your telephone number.
- The address and **precise** location of the ACM.
- A picture if possible and approximate quantity.

Each report will be investigated by the BAM and the University Asbestos consultancy.

2. Emergency incident reporting process

In the event of an emergency incident (damaged asbestos, with possible exposure), immediately stop work and refer to the flowchart below**.** Please note that this is a general guide as to precautions to be undertaken, contractors may have supplementary or additional procedures.



3. **Incident investigation process**

The Incident report must be submitted via **Online Reporting system.** The immediate action would be to make the area safe and follow the flow chart above. Every reported incident involving asbestos will be investigated by the H&S team. Asbestos Management Group is being notified about each incident and makes a decision of escalation to the VC,

as the duty holder. For serious incidents VC may decide to lead on the investigation by holding Post-Incident Review meetings.

To prevent reoccurrence, Health and Safety team, supported by Estates, will:

a. Gather documentation and Information

- Incident details, including the date, time, location, and circumstances surrounding the exposure.
- Information about the individuals involved, their roles, and any witnesses to the incident.
- Relevant records such as RAMS, permits to work, asbestos management plans, and safety procedures.

b. Assess the Exposure

- Information obtained from air monitoring and sampling will determine the extent of asbestos contamination.
- The duration and level of exposure for individuals involved will be assessed.
- A specialised consultants from Institute of Occupational Medicine may be involved to conduct Retrospective Risk Assessment and the risks from exposure.

c. Conduct Root Cause Analysis

- Investigate the root causes of the asbestos exposure incident, including any failures in work practices, equipment, or procedures.
- Consider factors such as inadequate training, lack of appropriate protective equipment, or insufficient hazard identification.

d. Recommend Corrective Actions

- Implement immediate corrective actions to mitigate the risk of further exposure. This may include improving work practices, enhancing training programs, or upgrading equipment.
- Communicate the findings and necessary actions to relevant stakeholders, including employees, contractors, and regulatory agencies.

e. Conduct Follow-up and Monitoring

- Conduct follow-up air monitoring to ensure that asbestos levels are within acceptable limits.
- Monitor the health of individuals involved in the incident, providing medical examinations as necessary.
- Review and update asbestos management plans and safety procedures to prevent future incidents.

f. Report

- Report the incident to relevant regulatory authorities as required by law.
- Keep detailed records for future reference and regulatory compliance purposes.

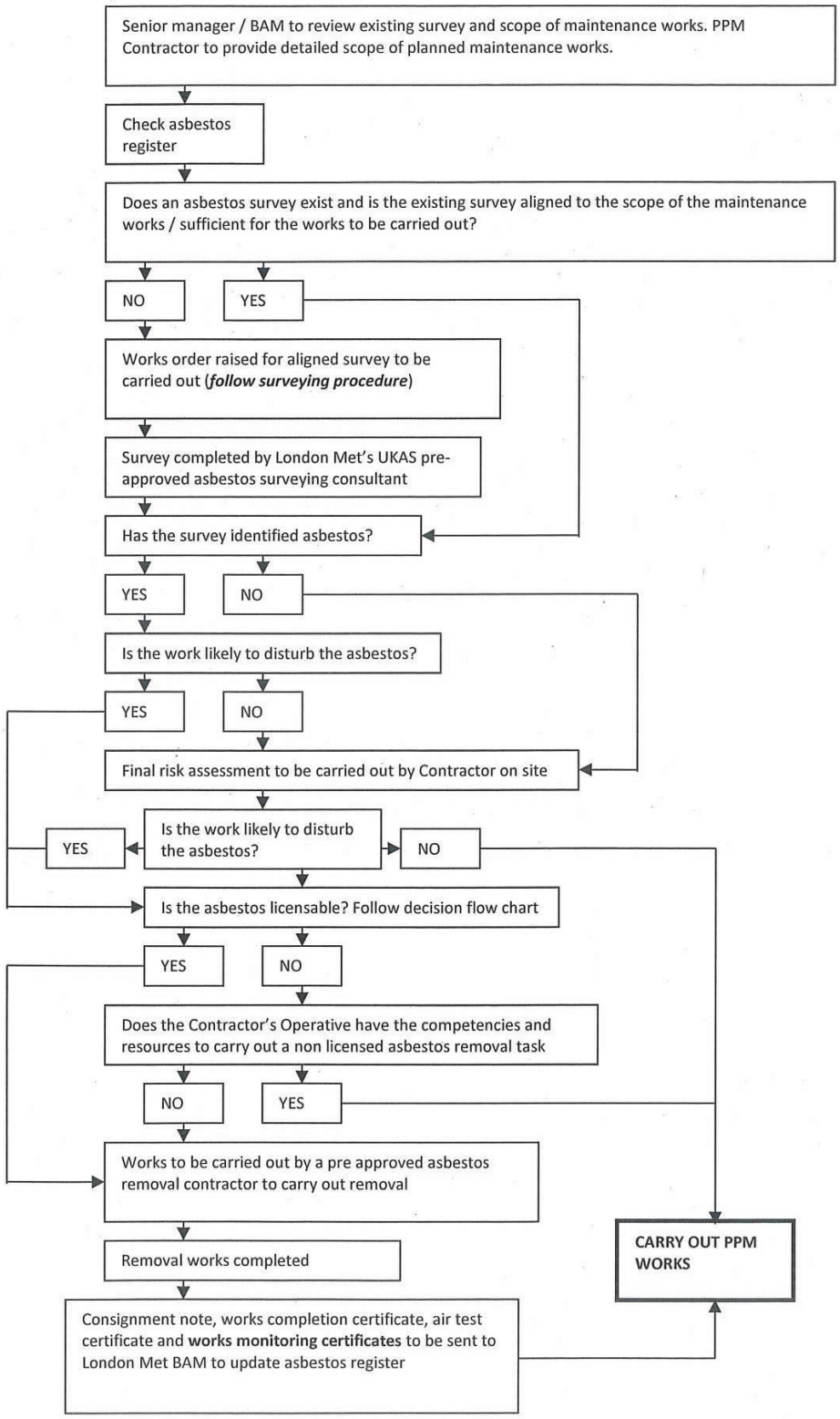
g. Review and Closure

- Conduct a final review of the incident investigation process to ensure all necessary actions have been completed.
- Close out the investigation formally, documenting any remaining follow-up tasks or outstanding issues.
- Share insights and recommendations from the incident investigation with relevant stakeholders to promote organizational learning and continuous improvement.

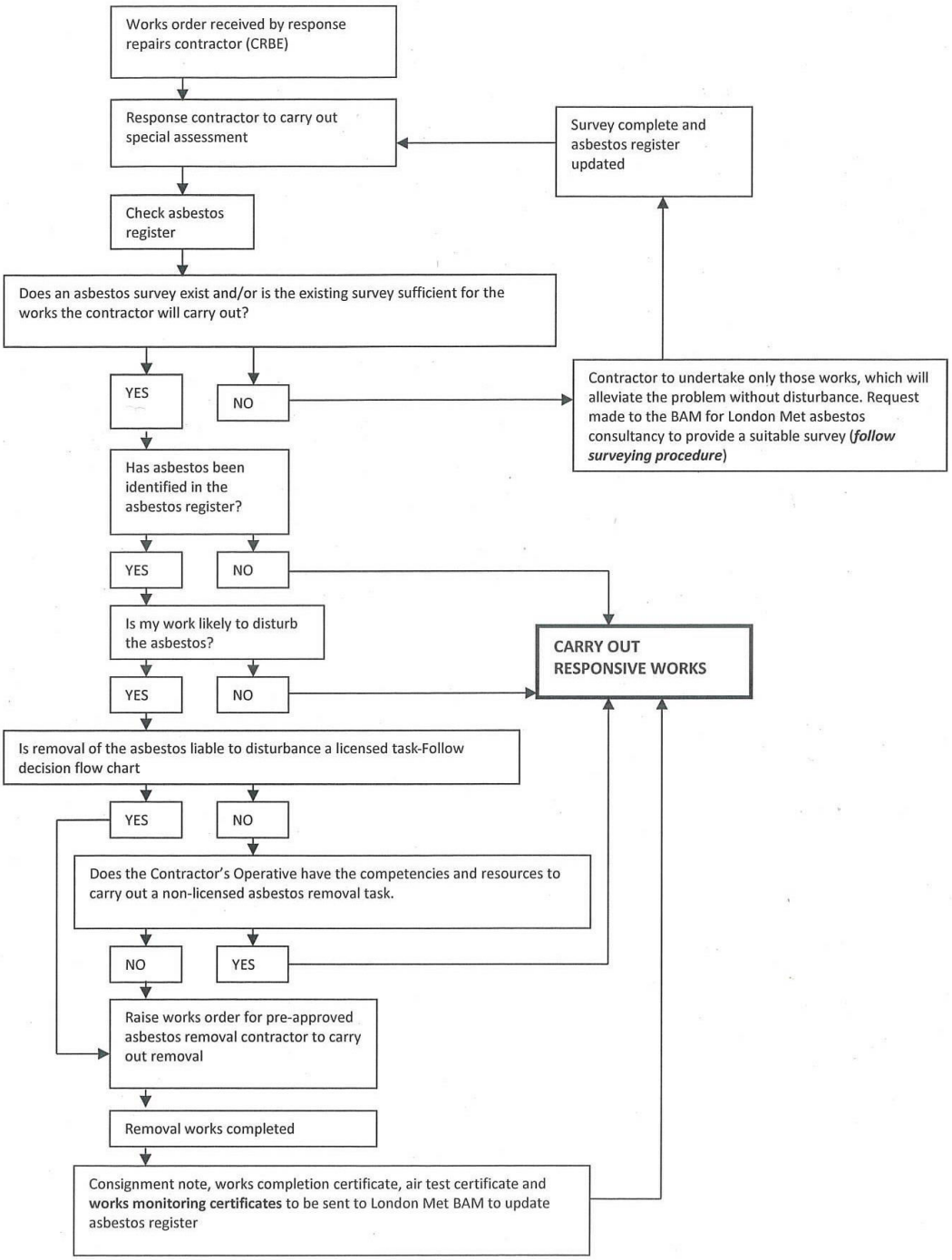
h. Work Towards Continuous Improvement

- Use lessons learned from the incident investigation to improve overall safety practices and procedures.
- Regularly review and update asbestos management plans and safety protocols to address emerging risks and regulatory changes.

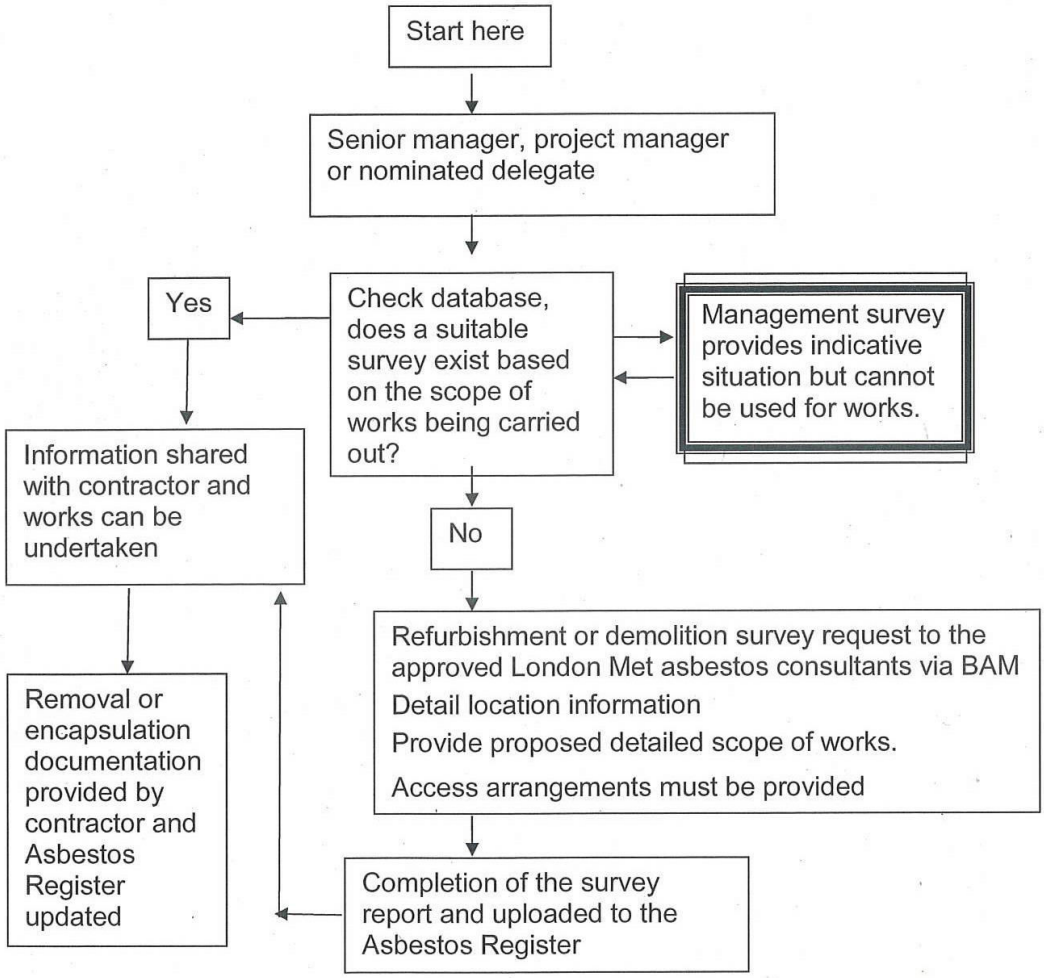
Appendix 1 Planned maintenance process flow diagram



Appendix 2 Response (unplanned) repairs - process flow diagram



Appendix 3 Refurbishment and demolition asbestos survey procedure flow diagram



Note:

London Met senior manager, project manager or nominated delegate to refer to BAM for support in all cases and to check the survey for sufficiency against proposed works activities (e.g. maintenance).