

# ASBESTOS MANAGEMENT PLAN

Policy, organisation and arrangements

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8<sup>th</sup> Edition, September 2021

### History of revisions

Issue	Date	Nature of revision	Prepared by	Approved by
2	April 2013	First issue	Sean Callaghan	Health & Safety Committee
3	April 2014	Annual review –amended to reflect <ul style="list-style-type: none"> <li>• Introduction of new HSE guidance L143 Managing and working with Asbestos</li> <li>• Clarification of work that may be undertaken by non-framework contractors</li> <li>• Updates to improvement plan</li> </ul>	Sean Callaghan	M Simpson, H&S Services, Director
4	April 2015	Annual review amended to reflect updates on improvement plan	Sean Callaghan	M Simpson, Health and Safety Services, Director
5	October 2015	Amended to reflect duties of Principal Designer under Construction (Design and Management) Regulations 2015 (CDM 2015)	Sean Callaghan	Moira Simpson, Health and Safety Services, Director
6	October 2016	Annual review amended to include link to asbestos register on EDMS	Sean Callaghan	Moira Simpson Health and Safety Services Director
7	September 2018	Annual review – amended to reflect <ul style="list-style-type: none"> <li>• Removal of reference to Asbestos Working Group</li> <li>• Review of flow charts –appendices 3 to 9</li> <li>• Introduction of frameworks for reactive maintenance</li> <li>• Restructuring of Estates and Facilities</li> <li>• Review of training requirements</li> </ul>	Sean Callaghan	Jenny McGrother Health and Safety Services Director
8	September 2021	Annual review – amended to reflect <ul style="list-style-type: none"> <li>• Additional duty holder nominated</li> <li>• Changes to roles and responsibilities of ASCA and project teams</li> <li>• Addition of Priority Risk Assessment to reflect asbestos re-inspection frequency</li> <li>• Asbestos Management for leasehold buildings included</li> <li>• Introduction of “HSG247 – Asbestos: The Licensed Contractors Guide” and “HSG248 – Asbestos: The Analyst’s Guide to Sampling, Analysis and Clearance Procedures”</li> </ul>	August Pistorius	Jenny McGrother Health and Safety Services Director

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## 1. Asbestos Policy

### 1.1. Introduction

This document, the Asbestos Management Plan (AMP) sets out the University of Reading's policy, organisation and procedures for managing the risks from Asbestos Containing Materials (ACMs) in all of its premises.

Some buildings owned or occupied by the University of Reading were built or refurbished at a time when the use of ACMs in their construction was common. Therefore, this Plan is designed to effectively manage and minimise asbestos related health risks to staff and other persons working or occupying University premises.

#### **Guidance:**

The presence of an ACM in itself does not constitute a danger. However, there is a potential risk to health if such material is disturbed and damaged. An isolated accidental exposure to asbestos fibres for a short duration is extremely unlikely to result in the development of asbestos related diseases. However, regular exposure – even at relatively low levels – can present a risk. As well as people employed in the building trades, inadvertent exposure (and consequent risk) can occur in other groups of people e.g., installers of I.T. systems, burglar alarms, smoke detectors, etc.

Working with, and managing, ACMs is controlled by legislation, primarily the Control of Asbestos Regulations 2012 (CAR 2012) (Ref. 1). Guidance is provided in the Approved Code of Practice L143 Managing and working with asbestos (Ref 2). Other relevant legislation includes the Health and Safety at Work Act 1974 and the Management of Health and Safety at Work Regulations 1999.

### 1.2. Policy Statement

This policy supplements the University of Reading's Health and Safety Policy which states that:

*The University of Reading recognises its duty to provide a safe place of work and a healthy working environment. We believe that excellence in the management of health and safety is a fundamental part of effective and efficient management, in support of academic excellence and innovation.*

In compliance with this general principle the University is committed to meet all duties placed upon it by the CAR 2012 and specifically will:

- Protect, so far as reasonably practicable, staff, students, contractors and visitors to University properties from any exposure to asbestos fibres
- Provide adequate resources in support of this Asbestos Management Plan
- Identify, so far as is reasonably practicable, all ACMs in University buildings
- Maintain an asbestos register of all ACMs identified and make it freely accessible to those undertaking work on University properties

- Implement and maintain an effective Asbestos Management Plan (AMP) to ensure that all ACMs are maintained in a safe condition or alternatively are isolated or removed
- Promote awareness of the risks from ACMs and the University AMP through training and induction of relevant staff and contractors
- Appoint a competent and suitably qualified person to undertake the role of Appointed Person as identified in HSE guidance HSG264 '*Asbestos: The Survey Guide*' (Ref. 3). This role will carry the title Asbestos & Safety Compliance Adviser (ASCA)
- Only engage appropriately trained, qualified and competent persons to undertake any work with ACMs (including management, surveying, abatement and removal)
- Provide adequate and timely resources to enable effective implementation of the AMP
- Regularly review the AMP

## 2. Asbestos Management Plan

This Plan sets out the mechanism, roles and responsibilities by which ACMs are to be managed. It includes details on how the University intends to:

- Protect staff and others working on the fabric of University properties
- Protect staff and others working within or occupying University properties
- Identify all ACMs and manage associated hazards based on assessment of the risk they present and prioritisation of action
- Effectively control any work likely to affect ACMs
- Undertake maintenance work
- Undertake project work
- Monitor and maintain ACMs in good condition where it is assessed as being safe to leave them in situ
- Respond to and manage any emergencies involving ACMs.

### 2.1 Legal framework

Whilst the plan is intended to comply with all aspects of the requirements of CAR2012 and other relevant legislation, the following duties within CAR 2012 are expressly highlighted as being fundamental to the success of the University's effective asbestos management system, and underpin this Plan:

#### ***Regulation 4 requires Duty Holders to:***

- Find ACMs and check their condition
- Presume that materials contain asbestos unless there is strong evidence to suppose they do not

- Keep an up-to-date written record of the location and condition of ACMs
- Assess the risk of anyone being exposed to these materials
- Prepare and put into effect a management plan to manage the risk and keep ACMs in a good state of repair, or ensure that it is repaired or if necessary removed
- Provide information on the location and condition of the material to anyone potentially at risk

**Regulation 5 - Identification of the presence of asbestos states:**

An employer shall not undertake work in demolition, maintenance, or any other work which exposes or is liable to expose their employees to asbestos unless either:-

- They have carried out a suitable and sufficient assessment as to whether asbestos is liable to be present
- If there is doubt, assumes that asbestos is present

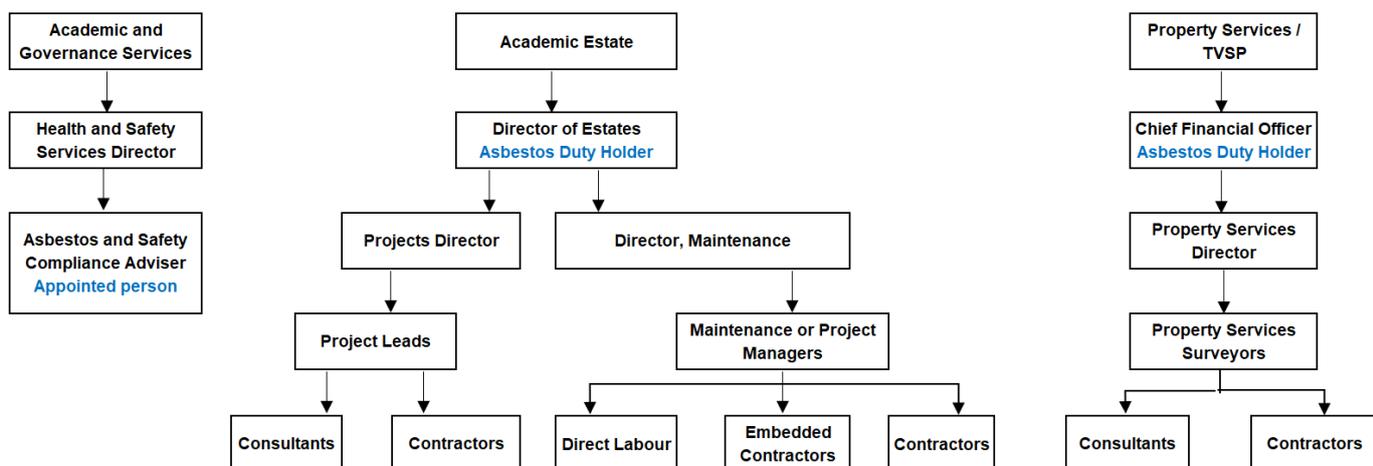
**Regulation 10 requires employers to:**

- Ensure that adequate information, instruction and training is given to employees who are liable to disturb asbestos while carrying out their normal everyday work, or who may influence how work is carried out.

**3. Asbestos Management Plan Implementation Chart**

Key roles within the AMP are represented as follows:

**Key roles within the AMP**



### 3.1 Definitions

#### ***Duty Holder***

*The Duty Holder is the person or organisation that has clear responsibility for the maintenance or repair of non-domestic premises through an explicit agreement such as a tenancy agreement or contract. They therefore have the 'duty to manage' the asbestos in the premises, as per Regulation 4 of the Control of Asbestos Regulation (CAR) 2012 (Ref. 1)*

#### ***Appointed Person***

To help comply with the legal requirements and to ensure that ACMs in premises are properly managed, Duty Holders should identify a person within their organisation who will be responsible for the day-to day-management. The appointed person will need the resources, skills, training and authority to ensure that the ACMs are managed effectively as described in the HSG264 - Asbestos: The Survey Guide (Ref. 3)

### 3.2 Responsibilities

#### ***All persons employed by the University of Reading***

Are required to:

- Make every effort to avoid disturbing or damaging any ACMs
- Report to the Building Support Officer or Estates (Helpdesk extension 7000 or [fm-help@reading.ac.uk](mailto:fm-help@reading.ac.uk)) if they suspect that ACMs or materials suspected of containing ACMs has become disturbed and/or damaged, or is likely to become disturbed or damaged
- Notify Estates of any intended work which may interfere with the fabric of any University premises by completing the 'Authorisation to Work' request form
- Ensure that the proposed work does not start until an 'Authorisation to Work' request has been received and approved by Estates, in consultation with the Asbestos & Safety Compliance Adviser.
- Comply with all aspects of this AMP

#### ***Director of Estates (Duty Holder)***

Responsibilities:

- Ensuring that adequate resources are provided and allocated to enable compliance with this Plan
- The safe management and operation of Estates activities, including consideration of asbestos issues and compliance with the AMP, within the operational and investment estate under Estates control
- Devolving the principal functions of asbestos management to the Estates Heads of Departments responsible for Maintenance, Projects, and Campus Services
- Ensuring that Estates staff have suitable initial and refresher training with respect to asbestos issues to comply with legislation and to ensure a high level of asbestos awareness

**Chief Financial Officer (Duty Holder)**

Responsibilities:

- Ensuring that adequate resources are provided and allocated to enable compliance with this Plan
- The safe management and operation of Property Services activities, including consideration of asbestos issues and compliance with the AMP, within the operational and investment estate under Property Services control
- Devolving the principal functions of asbestos management to the Property Services Building Surveyor team
- Ensuring that Property Services staff have suitable initial and refresher training with respect to asbestos issues to comply with legislation and to ensure a high level of asbestos awareness

**Asbestos & Safety Compliance Adviser (ASCA) (Appointed Person)**

Responsibilities:

**General ACM Management**

- Maintaining an effective asbestos management strategy
- Providing competent professional advice on ACMs and their treatment to those with responsibilities under this Plan
- Ensuring that regular inspections of ACMs are undertaken, and updating the Asbestos Register to reflect the current condition
- Programming surveys in University premises to identify any ACMs that may be present, and updating the Asbestos Register
- Maintaining the Asbestos Register for all University premises
- Ensuring that the asbestos register is updated following completion of any works on ACMs including providing the relevant Project Manager with details of residual asbestos hazards remaining in the vicinity of any proposed work.
- Ensuring that all records of ACMs include a Material Risk Assessment and Priority Risk Assessment in accordance with HSG 227 'A Comprehensive Guide to Managing Asbestos in Premises' (Ref 4)
- Reviewing and updating (in conjunction with the Health & Safety Services Director) this AMP
- Ensuring that all asbestos identified as being safe to leave undisturbed is adequately labelled where required in accordance with Appendix 2 of this document. NB This does not mean that all ACMs will be labelled
- Reporting any incident of alleged asbestos exposure to the Health and Safety Services Director and assisting with any investigation
- Assisting the Health and Safety Services Director in liaison with the HSE
- Promoting awareness of the hazards of ACMs and the AMP by advising on, and providing, appropriate training and induction, to University staff as required, and in particular to those whose work might bring them into contact with ACMs.

- Monitoring to ensure that Project Managers, Building Support Officers and staff are aware of their responsibilities under this AMP
- Attending in accordance with the Emergency Action Plan: Accidental Release of Asbestos (see Section 9) and taking such actions as are required to ensure safety
- Maintaining their professional competence, including a thorough understanding of all relevant legislation, codes of practice, guidance and good practice

#### *Reactive ACM management – Maintenance*

- Providing information on ACMs as required
- Attending site and providing guidance to maintenance staff on remedial actions or precautions to be taken in respect of ACMs
- Organising appropriate asbestos abatement action to facilitate maintenance tasks

#### *Reactive ACM management – Project and Estates Management*

- Providing information on ACMs as required
- Reviewing the project brief and providing guidance on abatement actions or precautions to be taken in respect of ACMs
- Where intrusive work is planned, identify and instigate actions required to undertake a suitable and sufficient assessment to satisfy regulation 5 of CAR2012
- Organising appropriate asbestos abatement action to facilitate project work
- Ensuring that the asbestos register is updated following completion of any works on ACMs including providing the relevant Project Manager with details of residual asbestos hazards remaining in the vicinity of any proposed work

#### *Financial administration*

- Assisting the Procurement Department to ensure that only competent and licensed asbestos removal contractors are engaged to carry out work with ACMs
- Assisting the Procurement Department to ensure that only competent and UKAS accredited consultants are employed to provide services in conjunction with identifying and working with ACMs

#### *Management of asbestos abatement works*

- Providing advice on request to Project Managers and Maintenance Managers on commissioning of asbestos surveys including identifying the required scope of works and method statements
- Ensuring that the asbestos register is updated following completion of any works on ACMs including providing the relevant Project Manager with details of residual asbestos hazards remaining in the vicinity of any proposed work
- Stopping work where an Asbestos Contractor does not perform to the required health and safety standards, or where their actions appear likely to result in a breach of health and safety or University requirements
- Monitoring Asbestos Contractors to assess their compliance with statutory and University requirements, and reporting and discussing deficiencies with the Head of Procurement

- Advising on appropriate level of air monitoring strategies, analytical support and attendance on request of Project Managers.

### ***Project Managers and Project Leads***

Responsibilities:

- Providing cost estimates for asbestos work
- Tendering asbestos work and raising instructions in accordance with procurement procedures
- Authorising invoices for completed work
- Preparing a specification for asbestos remedial works
- Assessing the Asbestos Contractor's Plan of Works
- Assessing and directing the appropriate level of air monitoring, analytical support and attendance required in consultation with the ASCA
- Informing appropriate staff of asbestos related works in good time
- Making local arrangements with building users and service providers to facilitate the asbestos works
- Organising where appropriate an asbestos contract pre-start meeting to agree the Plan of Works, attended generally by the ASCA, Project Manager, Contractor and Analyst.
- Reviewing method statement amendments with Contractor's Site Supervisor and senior Manager
- Ensuring site works comply with relevant University requirements
- Stopping work where an Asbestos Contractor does not perform to the required health and safety standards, or where their actions appear likely to result in a breach of health and safety or University requirements

### ***University Supervising Officers (SO) (see Section 7.1 for definition)***

Responsibilities:

- Compliance with the requirements of this AMP in all aspects and as specifically defined in Appendices 3, 4 & 5
- Liaising with the ASCA on all projects in buildings constructed before 2000
- Providing information on known ACMs to contractors undertaking work
- Notifying the ASCA on any changes in project scope that may impact on asbestos management

### ***Maintenance personnel***

Responsibilities:

- Checking the asbestos register before undertaking any work in properties built before 2000
- Notifying the ASCA immediately and stopping work if they encounter damaged or disturbed known or suspected ACMs

**Contractors**

## Responsibilities:

- Ensuring that any employees undertaking work on University's properties have received asbestos awareness training in accordance with CAR2012
- Ensuring that any employees undertaking work on University properties have been made aware of the University's Site Rules for Working on University Premises [http://www.reading.ac.uk/web/FILES/health-and-safety/CoP\\_51\\_Site\\_Rules.pdf](http://www.reading.ac.uk/web/FILES/health-and-safety/CoP_51_Site_Rules.pdf)
- Disseminating information on known ACMs to those undertaking the work
- Not undertaking any work which may disturb known or suspected ACMs
- Notifying the ASCA immediately and stopping work if they encounter damaged or disturbed known or suspected ACMs
- Complying with all aspects of this AMP.

**Health and Safety Services Director**

## Responsibilities:

- Periodically auditing compliance with this AMP
- In conjunction with the ASCA investigating and reporting to the University Health and Safety Committee on any alleged incident of accidental asbestos exposure and for ensuring reporting of incidents under RIDDOR, where appropriate
- Notification to the Occupational Health Service should any member of staff be involved in an incident of accidental asbestos exposure in order that occupational health advice can be given if required.

**Occupational Health**

## Responsibilities:

- Providing occupational health advice to management and staff on issues relating to asbestos
- Ensuring that any exposure is recorded on the employee's medical notes and retaining the medical notes for a period of forty years after the date of final exposure

**4. Identification of Asbestos Containing Materials**

In order to manage the risk from asbestos the University will ensure that a suitable and sufficient assessment is carried out as to whether asbestos is or is not likely to be present in University buildings. This requirement is valid for any property built before 2000.

**Guidance:**

The use of asbestos in UK buildings has been progressively prohibited until a complete ban of all use in construction in 1999. Some products containing chrysotile were still available after 1989 although generally in a form that would present a low risk of releasing fibres if damaged. It was generally the University's policy to specify the use of asbestos substitute materials where they were available in properties built after 1989.

In order to prioritise areas of higher risk the University has further split its portfolio as follows:

#### 4.1 Management Surveys

***CAR 2012 Regulation 4 The management of asbestos in non-domestic premises***

A management survey is the standard survey required to enable the University to meet the Duty to manage ACMs as required under the above regulation. Its purpose is to locate, as far as reasonably practicable, the presence and extent of any suspect ACMs in a building which could be damaged or disturbed during normal occupancy, including foreseeable maintenance and installation, and to assess their condition.

The Project Manager is responsible for commissioning all surveys. The Asbestos & Safety Compliance Adviser will review and advise on requirements for commissioning of asbestos surveys. The standard to be adopted is described in *HSG 264 Asbestos – The Survey Guide (first published by the HSE in 2010)*.

**Guidance:**

Prior to the introduction of HSG264 Management Surveys were known as Type 2 Sampling Surveys and were carried out by the University in accordance with *MDHS100 Surveying, sampling and assessment of asbestos-containing materials (first published by the HSE in 2010)*. (Ref. 3)

The survey will usually involve sampling and analysis to confirm the presence or absence of ACMs but may also involve presuming the presence of ACMs, particularly where areas are inaccessible.

The survey will only involve minor intrusive work, but this should include inspection of underfloor coverings, above false ceilings and inside risers, service ducts, lift shafts etc.

The normal approach will be to commission Management (previously Type 2) surveys through consultants accredited by the United Kingdom Accreditation Service (UKAS) as complying with ISO/IEC 17020 – for undertaking surveys for asbestos containing materials.

Sample analysis will be carried out by an asbestos consultant who is accredited by the United Kingdom Accreditation Service (UKAS) as complying with ISO/IEC 17025 for the analysis of bulk samples to establish the presence and type of asbestos.

The information from all surveys is held on the asbestos register. Electronic copies of the surveys are held by the Asbestos & Safety Compliance Adviser. Any new information or updates to the existing data will only be entered by, or under the direction of, the Asbestos &

Safety Compliance Adviser and in his absence the Construction & Estate Health and Safety Adviser will be responsible for overseeing the process.

**Guidance:**

The University Asbestos Register is currently held as a module of Wren and is available on EDMS– see Section 5.1.

## 4.2 Intrusive works

### ***Regulation 5 – Identification of the presence of asbestos***

Where the University is to commission work in demolition, refurbishment or maintenance, it must undertake a suitable and sufficient assessment as to whether asbestos is likely to be present. A management survey is unlikely to provide sufficient information to satisfy this requirement, particularly where intrusive works are planned.

**Guidance:**

***Where any intrusive work is planned in a building constructed before 2000 the Asbestos & Safety Compliance Adviser must be consulted.***  
***Intrusive work includes all demolition or breaking out, forming openings (of any size) in walls, floors and ceilings, opening up of ducts, boxing or voids, lifting of coverings etc.***

The Asbestos & Safety Compliance Adviser will assess the quality and extent of existing information and decide whether it is suitable and sufficient to permit the proposed work to proceed. Where it is not sufficient, the Asbestos & Safety Compliance Adviser will advise the Project Manager of further survey work which will need to be undertaken.

### ***Minor intrusive work***

Where deemed appropriate, the Asbestos & Safety Compliance Adviser will undertake a site inspection to enable a suitable and sufficient assessment to be made. The ASCA is the sole authority for undertaking such assessments. Alternatively, a refurbishment survey must be commissioned from an approved framework consultant accredited by the United Kingdom Accreditation Service (UKAS) as complying with ISO/IEC 17020.

### ***Refurbishment and demolition surveys***

A refurbishment and demolition survey are needed before any refurbishment or demolition work is carried out. This type of survey is used to locate and describe, as far as reasonably practicable, all ACMs in the area where the refurbishment work will take place or in the whole building if demolition is planned. The survey will be fully intrusive and involve destructive inspection, as necessary, to gain access to all areas, including those that may be difficult to reach. A refurbishment and demolition survey may also be required in other circumstances e.g. when more intrusive maintenance and repair work will be carried out or for plant removal or dismantling.

The Project Manager is responsible for instruction of Refurbishment and Demolition surveys, with the Asbestos & Safety Compliance Adviser advising on scope of work and on further

actions or remediation work to be taken. Refurbishment and Demolition surveys must be commissioned from an approved framework consultant accredited by the United Kingdom Accreditation Service (UKAS) as complying with ISO/IEC 17020.

The standard to be adopted for refurbishment and demolition surveys is described in *HSG 264 Asbestos – The Survey Guide (first published by the HSE in 2010)*. (Ref. 3)

**Guidance:**

Prior to the introduction of HSG264 Refurbishment and Demolition Surveys were known as Type 3 Intrusive surveys and were carried out in accordance with *MDHS100 Surveying, sampling and assessment of asbestos-containing materials (first published by the HSE in 2010)*. (Ref. 3)

Generally new surveys will be commissioned through approved framework consultants accredited by the United Kingdom Accreditation Service (UKAS) as complying with ISO/IEC 17020 – for undertaking surveys for asbestos containing materials. Sample analysis will be carried out by an asbestos consultant who is accredited by the United Kingdom Accreditation Service (UKAS) as complying with ISO/IEC 17025 for the analysis of bulk samples to establish the presence and type of asbestos.

The information from all surveys or assessment is held on the asbestos register.

## **5. Management of Asbestos Containing Materials**

### **5.1 Asbestos Register**

#### ***Information recorded***

The register records known and suspected ACMs in University of Reading. Where ACMs are recorded as a minimum it will record information on their:

- Location
- Material type
- Asbestos type
- Extent of damage
- Surface treatment
- Management status
- Date of inspection
- Name of person inspecting
- Date of next inspection

Where this information is completed, the asbestos register will automatically generate a “material risk assessment score” as identified within HSG264 Asbestos – The Survey Guide.

***Additional information recorded***

At the discretion of the Asbestos & Safety Compliance Adviser additional information will be recorded including:

- Normal occupant activity
- Accessibility
- Extent
- Number of occupants
- Frequency of use of area
- Average time in use
- Type of maintenance
- Frequency of maintenance
- Photographs

Where this information is completed, the asbestos register will automatically generate a “priority risk assessment score” as identified within HSG264 Asbestos – The Survey Guide.

In addition, relevant supporting documents will be stored against the appropriate record on EDMS. These may include:

- Bulk sample analysis reports
- Reassurance air tests
- Four stage clearance certificates
- Waste consignment notes
- Photographs
- Management and Refurbishment & Demolition surveys

**Guidance:**

Supporting documents have been stored on EDMS and are linked to the appropriate entry on the asbestos register from 2010 onwards. Information before that date, where available, is held by the Asbestos & Safety Compliance Adviser.

The register will also record information non-ACMs where they have been sampled as part of the survey process or where they may be confused with ACMs.

***Updating the register***

The register will only be updated by, or under the direction of, the Asbestos & Safety Compliance Adviser and in his absence the Construction & Estate Health and Safety Adviser will be responsible for overseeing the process.

Updates will be required following:

- Re-inspection of the ACM
- Removal, repair, or encapsulation of the ACM
- Identification of further ACMs or following sampling of non-ACMs
- New management surveys

- New refurbishment and demolition surveys
- Changes in building layout or area use

The record of the ACM will be archived on the EDMS system each time an update is made.

**Storage and availability**

The register will be stored electronically on the University Wren system. Read-only access will be available to all authorised University personnel through the Wren portal. Where Wren access is not granted, Staff, Consultants and Contractors can access the register through the **Electronic Document Management System**.

<https://edms.reading.ac.uk/sites/EF/WrenSS/SitePages/Asbestos.aspx>

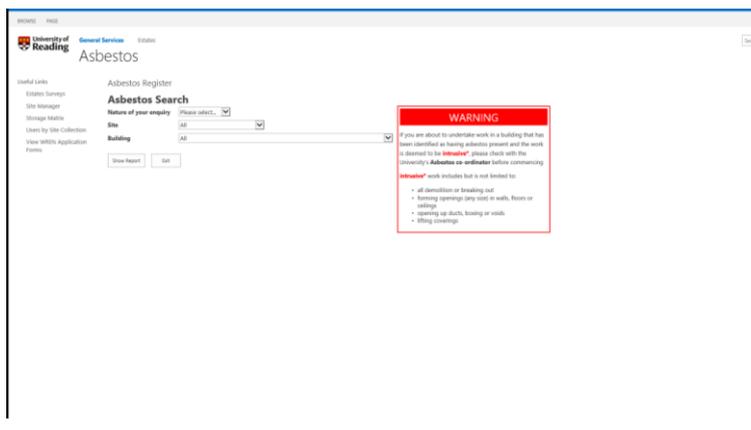
Consultants and Contractors will require a University Username and Password. They should make application to the relevant SO

**Accessing the asbestos register**

Users accessing the asbestos register must provide information on the reason for their enquiry including order number or Wren number where appropriate.



Wren access



EDMS access

**5.2 Management action**

**Strategy**

Where ACMs are in a safe condition and are unlikely to be disturbed, it will be left in situ. ACMs will be inspected regularly at intervals determined by the Asbestos & Safety Compliance Adviser. This will typically be every twelve months but may be less or more based upon risk assessment, type of ACM, its location and the activities in the area concerned.

**All work with ACMs will be undertaken by a licensed asbestos contractor from the University's framework irrespective of whether work actually requires a license.**

### ***Assessment of action priorities***

All ACMs will be subject to a **material risk assessment** score and **priority risk assessment** score in accordance with HSG227 - *A Comprehensive guide to managing asbestos in premises*. (Ref. 4) This will be the prime guide in assessing priority for action.

The **material risk assessment** assesses the likelihood of an ACM releasing fibres if it is disturbed and considers:

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

Each of the parameters is scored and added to give a total score between 2 and 12:

- Materials with scores of 10 or more should be regarded as **high risk** with a significant potential to release fibres if disturbed
- Those with a score between 7 and 9 are regarded as **medium** risk of fibre release
- Materials with a score between 5 and 6 are **low risk** to release fibres
- Scores of 4 or less are **very low risk** and unlikely to release fibres

The decision to instigate remedial action is at the direction of the Asbestos & Safety Compliance Adviser. However, where an ACM has a recorded score of 8 or above action would normally be required. Where no action is to be taken the ASCA will record the reasons on the asbestos register including details of the other control measures that are being relied upon.

The **Priority (Building) risk assessment** assesses the likelihood of an ACM being disturbed and considers factors such as:

- Normal occupant activity
- Likelihood of disturbance
- Human exposure potential
- Maintenance activity

Each of the factors is scored between 0 and 3 and added to give a total score between 0 and 12:

- High Potential for disturbance 9 points or above
- Medium Potential for disturbance 6-8 points
- Low Potential for disturbance 3-5 points
- Very Low Potential for disturbance 0-2 points

### **Total Risk Assessment**

The scores from the **material risk assessment** (the condition of the ACM) are added to the score of the **priority risk assessment** (the likelihood of disturbance), to give the **Total Risk Assessment**. The assessment will automatically be generated by the asbestos register software after data entry and will be reviewed by the Asbestos & Safety Compliance Adviser, who will decide on appropriate action.

For management and re-inspection purposes, asbestos identified following Total Risk Assessments is categorised based on scores as follow:

- **High Risk 18 points or above** - Materials within this category should be removed, if possible, but where removal is not possible it should be inspected on a 6 monthly inspection cycle to ascertain any change in category
- **Medium Risk 12-17 points** - Materials within this category should be inspected on a 12 monthly inspection cycle to ascertain any change in category
- **Low Risk 6-11 points** - Materials within this category should be inspected on an 18 monthly inspection cycle to ascertain any change in category
- **Very Low Risk 0-5 points** - Materials within this category should be inspected on a 24 monthly inspection cycle to ascertain any change in category

#### **Guidance:**

Full details of the algorithms used can be found in *HSG227 'A Comprehensive Guide to Managing Asbestos in Premises'* (Ref. 4).

### **Labelling**

Warning labels or appropriate signage will be applied to ACMs considered to be a significant risk where this is deemed to:

- Help prevent accidental damage, and
- Not cause undue concern



Lower risk materials such as floor tiles, textured coatings, cement materials will not be routinely labelled but adequate steps will be undertaken to raise site awareness of their presence e.g., briefings to Building Support Officers/ Health and Safety Co-ordinators. See Appendix 2 for more information on labelling requirements.

### **5.3 Authorisation to Work**

When staff, students, or other building occupants plan to carry out any work which might disturb the fabric of the building an 'Authorisation to Work' request form must be completed and submitted to Estates. The request form can be downloaded at:

<http://www.reading.ac.uk/buildingmaintenance/OurPoliciesandProcedures/bmaint-policies-and-procedures.aspx> . This should be sent to the Estates Help Desk.

Estates will review the proposed work to determine whether it can safely be carried out without Estates supervision. As part of the review process, for buildings constructed before 2000 the request form will be forwarded for review to the Asbestos & Safety Compliance Adviser who will make a suitable and sufficient assessment of asbestos risks in accordance with the AMP. Work cannot start until it has been authorised, in writing, by Estates.

## **5.4 Training**

### ***University Staff***

Regulation 10 of the CAR2012 places a duty on an employer to provide adequate, information, instruction and training to employees. The University will support this AMP by providing asbestos training and refresher training at an appropriate level to all relevant University staff.

Asbestos training is mandatory for all staff who may come into contact with asbestos in the course of their work. In particular, it will be given to all workers involved in demolition, refurbishment, maintenance and allied trades where it is foreseeable that their work will disturb the fabric of the building because ACMs may become exposed during their work. Exemption from this requirement will apply only where the University can demonstrate that work will only be carried out in or on buildings free of ACMs.

Training will be delivered by the Asbestos & Safety Compliance Adviser as the competent person described in clause 258 of L143 Managing and working with asbestos, Approved Code of Practice (ACOP). (Ref. 2) At the core of all training will be asbestos awareness as specified in the ACOP. The scope of the training will include:

- The properties of asbestos and its effects on health, including the increased risk of lung cancer for asbestos workers who smoke
- The types, uses and likely occurrence of asbestos and ACMs in buildings and plan
- The general procedures to be followed to deal with an emergency, for example an uncontrolled release of asbestos dust in the workplace
- How to avoid the risks from asbestos, for example for building work, no employee should carry out work which disturbs the fabric of the building
- Specific information, instruction and training to reflect the requirements of this AMP and the role being undertaken.

The schedule below (Table 1) specifies the training that will be provided to particular groups of workers.

Refresher training will be delivered at intervals to be determined by the Asbestos & Safety Compliance Adviser but would not normally be more than 24 months and will be as required in response to changes in legislation, serious incidents or significant changes in the AMP.

***Consultants and Contractors***

Any staff working for Contractors and Consultants in University properties built before 2000 must have received asbestos awareness training as specified in the ACOP. Evidence of compliance must be available on request.

In addition, embedded contractors working on maintenance tasks must undertake an Estates induction course which will include information on how to access the asbestos register.

Contractors' personnel working on project work must receive a site-specific induction from the Principal Contractor that should include a toolbox talk on local asbestos risks. Where requested this toolbox talk can be delivered by the Asbestos & Safety Compliance Adviser.

Consultants acting as Project Managers are required to attend the University in-house training module as specified below.

**Asbestos & Safety Compliance Adviser**

Asbestos & Safety Compliance Adviser will attend such courses as may be required to remain up to date with current legislation, best practice and any other matter that will maintain competence.

**Table 1 Summary of asbestos awareness training provided**

<b>Attendees</b>	<b>Course Content</b>
Direct Labour Maintenance Managers	<ul style="list-style-type: none"> <li>• Asbestos awareness in accordance with ACOP L143</li> <li>• Procedures for planned and reactive maintenance</li> <li>• Accessing and limitations of the asbestos register</li> <li>• Call out procedures</li> <li>• Emergency procedures</li> <li>• Refresher training as directed</li> </ul>
Project Leads Project Managers Estates Surveyors Maintenance Managers Consultants acting as PMs Duty Engineers	<ul style="list-style-type: none"> <li>• Asbestos awareness in accordance with ACOP L143</li> <li>• Procedures for project management</li> <li>• Accessing and limitations of the asbestos register</li> <li>• Emergency procedures</li> <li>• Refresher training as directed</li> </ul>
Framework contractors undertaking maintenance	<ul style="list-style-type: none"> <li>• Procedures for planned and reactive maintenance</li> <li>• Accessing and limitations of the asbestos register</li> <li>• Call out procedures</li> <li>• Emergency procedures</li> <li>• Refresher training as directed</li> </ul>
Building Support Officers Health and Safety Co-ordinators Technicians, IT Staff	<ul style="list-style-type: none"> <li>• Asbestos awareness in accordance with ACOP L143</li> <li>• Accessing and limitations of the asbestos register</li> <li>• Emergency procedures</li> <li>• Refresher training as directed</li> </ul>
Directors of Estates, Property Services and Health and Safety Services	<ul style="list-style-type: none"> <li>• The provisions of this AMP and their responsibilities under it</li> </ul>
Security Room Controllers	<ul style="list-style-type: none"> <li>• Accessing and limitations of the asbestos register</li> <li>• Emergency procedures</li> <li>• Refresher training as directed</li> </ul>
Contractors undertaking Project work	<ul style="list-style-type: none"> <li>• Accessing and limitations of the asbestos register</li> <li>• Site specific toolbox talk</li> <li>• Emergency procedures</li> </ul>

## 6. Work with Asbestos Containing Materials

### 6.1 Asbestos remediation work

Work involving the repair, encapsulation or removal of ACMs may only be carried out by the University's approved framework HSE licensed asbestos contractors. Appointment of contractors will generally be made directly but may be made through a principal contractor when agreed by the Project Manager.

Remedial action will be carried out where:

- Remedial action was identified following inspection under this AMP
- The work is required to facilitate a maintenance task
- The work is required to facilitate a planned project
- ACMs are to be removed prior to demolition
- There is a strategic benefit
- There are unplanned circumstances such as damage to ACMs, leaks or bursts in pipes etc.

The scope and specification of such remedial action will be at the direction of the Asbestos & Safety Compliance Adviser.

Work with ACMs requires effective management which includes clear communication with and consideration of building stakeholders. The timing of the work to be undertaken will be based on an assessment of the inherent risks and may need to be undertaken out of normal working hours as directed by the Asbestos & Safety Compliance Adviser.

Work falls into three categories:

- Licensed work
- Notifiable non-licensed work
- Non-licensed work

The contractor is responsible for making the correct notification in accordance with their license conditions. A copy of the notification together with the plan of works must be provided to the Project Manager who will forward all relevant documentation to the Asbestos & Safety Compliance Adviser and the asbestos consultant (where appointed) before work commences in a reasonable time.

#### **Guidance:**

Full details of work involving the repair, encapsulation, supervising or removal of ACMs can be found in: "HSG247 – Asbestos: The Licensed Contractors Guide" (Ref.5)

### ***Air monitoring and four stage clearance certification***

Where air monitoring and four stage clearance certification is required, this may only be carried out by one of the University's approved framework asbestos consultants. The

consultant must be accredited by the United Kingdom Accreditation Service to ISO/IEC 17025. The consultant will be appointed directly by the University without exception.

Air monitoring is essential where there is good reason for expecting exposure of asbestos to be above the control limit.

Air monitoring and certification requirements will be decided by the Project Manager in consultation with the Asbestos & Safety Compliance Adviser. Air monitoring should be carried out by the asbestos consultants from the University's approved framework.

The Asbestos & Safety Compliance Adviser will specify the extent of attendance that may be required by the asbestos consultant after consideration of the inherent risks, timing of the work and the local stakeholders.

Asbestos consultant analytical duties may include:

- Examining the contractor's daily log and documents
- Reviewing the contractor's performance against the specification, plan of work and programme
- Ensuring that asbestos materials are removed in a manner that prevents exposure, or if this is not possible to minimise the exposure
- Ensuring that general site safety is kept at an acceptable level and any permit to work system is adhered to
- Reporting progress to the Project Manager and Asbestos & Safety Compliance Adviser
- Witnessing of smoke test to confirm the integrity of the enclosure
- Conducting Far-source/perimeter air monitoring as required
- Providing reassurance air monitoring during the asbestos removal process to demonstrate fibre levels are not elevated above normal
- Conducting personal air monitoring when required to assess the effectiveness of dust suppression control measures and the suitability of respirator protection
- Providing background air monitoring as required
- Providing leak air monitoring during the asbestos removal process to demonstrate fibre levels are satisfactory outside enclosure
- Ensuring any enclosure is leak-proof
- Provide a certificate of reoccupation as part of a four stage Site Assessment for Reoccupation as follows:
  - i. Preliminary check of site condition and completeness
  - ii. A thorough visual inspection inside the enclosure/work area
  - iii. Air monitoring to establish that the respirable airborne fibre concentration within the enclosure is below the clearance indicator (0.01fibres/ml)
  - iv. Final assessment post-enclosure/work area dismantling
  - v. Certifying the decontamination unit is clean including clearance indicator testing

**Guidance:**

Full details of work involving bulk sampling and analysis; air monitoring sampling and analysis; site certification for reoccupation and decontamination procedures can be found in: HSG248 - Asbestos: The Analyst's Guide to Sampling, Analysis and Clearance Procedures" (Ref. 6)

**Control of hazardous waste**

ACMs shall be double bagged in clean sealed and labelled sacks (or wrapped) and be removed as it is produced. Bags may only be carried on transit routes agreed by the Asbestos & Safety Compliance Adviser for immediate removal from site or to a lockable container in an agreed location on site.

All asbestos waste shall be disposed of to a site licensed to receive it in accordance with the Hazardous Waste Regulations 2005. The contractor responsible for the waste consignment will provide documentary evidence of the safe disposal to the Project Manager who will forward documentation to Asbestos & Safety Compliance Adviser within a reasonable time.

**Updating of asbestos register**

Following any remedial work with ACMs the Asbestos & Safety Compliance Adviser will update the asbestos register. Copies of air test, four stage clearance certificates and waste consignment notes will be scanned into the Estates EDMS Wren Documents folder and appended against the appropriate ACM record. Where the work involved ACMs covered by several records the documents will be appended to the first record in numerical order, but all records will be updated.

The Project Manager will ensure all relevant Air Monitoring Reports, Certificate of Reoccupation, and Clearance Certificate of Decontamination Units, received from the Asbestos consultants are provided to the Asbestos & Safety Compliance Adviser within a reasonable time.

**Work with ACMs by non-framework contractors**

In exceptional circumstances and at the sole discretion of the Asbestos & Safety Compliance Adviser non-framework contractors may be permitted to remove ACMs which fall into the non-Licensed work category. All work must be carried out in accordance with CAR2012 and this AMP.

Examples of such work where this waiver may be granted include:

- Where non-licensed ACMs are integral to the construction of a building that is to be demolished, providing that the demolition contractor or their subcontractor holds an asbestos license issued by the HSE
- Where the work to remove the ACM involves exposure to another more immediate hazard. e.g. removal of asbestos containing fuse carriers by a suitably trained electrician
- Where the risk of release of asbestos fibre is negligible. e.g., removal of a toilet cistern intact

In all cases a detailed project specific method statement and risk assessment must be approved by the Project Manager with assistance upon request from the Asbestos & Safety Compliance Adviser before any work proceeds.

## **7. Asbestos Management Plan for Project Work**

### **7.1 Scope**

The asbestos management plans for undertaking project work where ACMs are known to be, or suspected of being present, are set out in Appendices 3 to 5. These procedures must be followed by all departments in Estates or Property Services which carry out project work.

The phases of project work break down into:

- **Preconstruction phase – Appendix 3**
- **Construction phase – where remediation is not anticipated – Appendix 4**
- **Construction phase – where remediation is required – Appendix 5**

For the purpose of the AMP those responsible for supervision of project work will be referred to as Supervising Officers (SO). Individual departments within Estates and Property Services have differing designations for those supervising project work, as follows:

- Business and maintenance services – Project Managers and Maintenance Managers
- Projects – Project Leads
- Property Services – Building Surveyors

Where external consultants are employed to manage projects they must follow these procedures, including those engaged as Principal Designers.

#### **Guidance:**

Project work is all potentially intrusive work not covered by the procedures for planned and reactive maintenance work undertaken by the Building Maintenance team – see Section 8.

## **8. Asbestos Management Plan for Maintenance Activities**

### **8.1 Background and scope**

This plan is to be adopted for all maintenance activities undertaken on behalf of Estates or Property Services in buildings constructed before 2000.

**Guidance:**

The Building Maintenance team is directly responsible for maintenance of the University's built estate, which comprises more than 400 buildings, including academic, residential and administrative premises.

The department deals with over 30,000 repairs and inspections each year, ranging from minor leaks to major improvement projects. The maintenance team employs labour directly in all aspects of building trades undertaking routine and reactive maintenance including providing a 24 hour call out service 7 days a week. The direct labour team are supported by a number of "embedded" contractors providing specialist services such as alarms, access control, Building Management Systems, water quality etc. In most instances the personnel working for the specialist companies are based permanently at the University. In addition the department operates a list of framework contractors who may be engaged on reactive work including call outs.

The majority of work undertaken is not intrusive in nature and ACMs are unlikely to be disturbed. Nevertheless, the University has a duty to inform employees and others who may work in the vicinity of ACMs of their presence. Therefore, these procedures must be followed.

All such tasks are recorded through Wren, the University's business management system.

It is important that all those undertaking maintenance activities recognise the limitations of the asbestos register and also understand the impact of their activities on the fabric of the building. Any staff or contractors undertaking maintenance work must therefore have received asbestos awareness training as specified in CAR 2012.

Where any work is to be undertaken in a building constructed before 2000 that is likely to be intrusive in nature-Asbestos & Safety Compliance Adviser should be consulted.

Intrusive work includes all demolition or breaking out, forming openings, (of any size) in walls, floors and ceilings, opening up of ducts, boxing or voids, lifting of coverings etc.

**IF IN DOUBT ASK.**

## **8.2 Maintenance procedures**

### ***Checking the Asbestos Register***

All those undertaking maintenance work in buildings constructed before 2000 must check the asbestos register before starting work.

**Guidance:**

Maintenance team operatives may check the asbestos register through EDMS on work issued Tablet devices. In addition, free access is available using the dedicated computer situated outside the maintenance stores in the Estates Building. Embedded subcontractors may use this facility but should also have access to the register through EDMS. A dedicated computer terminal is also available at the Greenlands campus in building G007 East Lodge.

All those checking the register must record the wren number or order number as part of the data enquiry to enable an audit trail of the asbestos management procedures.

### ***Reactive, planned and preventative maintenance asbestos management plans***

The plans for managing maintenance activities are set out in the following appendices:

- **Reactive and planned preventative maintenance by Direct Labour – Appendix 6**
- **Reactive and planned preventative maintenance by Embedded Subcontractors – Appendix 7**
- **Emergency callout for reactive maintenance – see Appendix 8**

## **9. Asbestos Management Plan for Accidental Disturbance of Suspect Materials**

The procedure set out in Appendix 9 must be followed following the discovery of significantly damaged suspected or known ACMs or where accidental damage to them has been caused in the course of a work activity.

## **10. Asbestos Management for buildings outside this plan**

Leasehold/tenanted buildings where the university is not the Duty Holder and do not have maintenance or repair obligations for the building fabric or building engineering services/infrastructure under the lease agreement will fall outside the scope of the University's AMP.

### **10.1 Asbestos Management Plan for Halls of Residence**

#### **Background and Scope**

The University transferred the management of Halls of Residences to UPP in January 2012. UPP took on the responsibility for managing asbestos containing materials in the transferred buildings and are required to develop an asbestos management policy and plan in accordance with CAR 2012.

University Health and Safety Services (normally the Asbestos & Safety Compliance Adviser) will periodically review UPP's performance and compliance with this plan, in accordance with the contract between both parties. This review will be at least annually but may be more frequent as considered necessary.

#### **Retained areas**

The University has retained the responsibility to staff and operate catering and bar facilities within the transferred Halls. The Asbestos & Safety Compliance Adviser will maintain an asbestos register for these areas and any work undertaken, either maintenance or new installations, will be in accordance with the details previously set out in this AMP.

### **Specialist Installations**

The University remains responsible for the installation of data cabling and CCTV throughout the transferred Halls. Any work undertaken will be in accordance with the procedures set out in this AMP. The Asbestos & Safety Compliance Adviser will be responsible for coordination with UPP where additional survey inspection is required. The inspections, where required, will be undertaken on behalf of the University in accordance with this AMP. Any relevant findings will be passed to UPP for incorporation into their asbestos management plan.

## **10.2 Asbestos Management for Leasehold buildings – Harborne**

### **Background and Scope**

A lease term between the University of Reading (UOR) and Royal Berkshire Hospital NHS Trust (RBH) has been entered into for the occupancy of the Harborne Building in July 2021. NHS RBH took on the responsibility for managing asbestos containing materials in the Harborne building and is required to develop an asbestos management policy and plan in accordance with CAR 2012.

University Health and Safety Services (normally the ASCA) will periodically review the NHS RBH's performance and compliance with this plan, in accordance with the contract between both parties. This review will be at least annually, but may be more frequent as necessary.

### **Retained Areas**

The University has retained the responsibility within Harborne on underleases for the following areas.

- CAF Lab (to be held by UOR only until November 2021)
- Radiation Room (to be held by UOR until radiation matters are closed out)
- Herbarium areas (to be held by the University of Reading long term)
- Plant areas servicing the Harborne Building which are located within the Lyle Building basement will stay under the University's control.

The ASCA will maintain an asbestos register for these areas and any work undertaken will be in accordance with the details previously set out in this AMP.

## 11. Review and Audit

### 11.1 Review

This AMP and associated policy will be reviewed regularly by-Asbestos & Safety Compliance Adviser. The intention of the review is to assess:

- The effectiveness of the AMP
- The impact of changes in asbestos and other health and safety legislation
- Changes in the University's property portfolio
- Lessons to be learned from significant incidents
- The impact of changes in personnel, introduction of new roles or corporate restructuring
- Changes in the University supplier chain
- Progress against the action plan

A review will be carried out:

- Annually
- Following a significant incident involving an uncontrolled release of airborne asbestos fibres
- Following a change in the Control of Asbestos Regulations
- If the AMP is no longer considered adequate

### 11.2 Audit

The Health and Safety Services Director will undertake an audit of the AMP. The purpose is to review compliance with the AMP and the effectiveness of the measures being taken.

The audit will review the following key indicators:

- Planning
- Management of specific risks
- Organisation and responsibilities
- Cooperation and communication
- Competence
- Accidents and Incidents
- Monitoring and corrective measures
- Audit and review
- Leadership and integration

An audit will be undertaken periodically but not less than every four years.

## 12. Asbestos Management Improvement Plan

The following Table (Table 2) outlines the proposed improvement plan over the next twelve-month cycle, commencing September 2021. This is a live document and updates on status can be obtained from the Asbestos & Safety Compliance Adviser.

**Table 2 Asbestos management improvement plan**

<b>Action</b>	<b>Estimated completion</b>	<b>Status</b>
Carry out inspections within Residential Lettings properties	Ongoing cycle	Access arranged for vacant possession periods
Re-inspection of known ACMs	Ongoing cycle	
Remedial action following identification of areas of risk	Ongoing cycle	
Support to Maintenance activities as defined in AMP	Ongoing cycle	
Support to project activities as defined in AMP	Ongoing cycle	
Support procurement for new asbestos contractor and consultant framework	January 2022	
Audit UPP asbestos management plan	Ongoing cycle	Annual audit with interim inspections termly

### **13. References**

1. Control of Asbestos Regulations 2012.
2. L143 - Managing and Working with Asbestos
3. HSG264 - Asbestos: The Survey Guide
4. HSG227 - A Comprehensive Guide to Managing Asbestos in Premises.
5. HSG247 - Asbestos: The Licensed Contractors Guide.
6. HSG248 - Asbestos: The Analyst's Guide to Sampling, Analysis and Clearance Procedures.

**Appendix 1 Authorisation to Work form**

<p><b>Estates</b>  <b>'AUTHORISATION TO WORK' REQUEST</b></p>
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<b>CLIENT REQUEST FOR 'AUTHORISATION TO WORK'</b>	
<p><b>Person responsible for the work:</b>                  Name of School, Hall etc:                  Tel. Number:                  E-mail:                  Building name / number:                  Floor level:                  Room number(s):                  Date of application:</p>	<hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/>
<p><b>Description of the proposed work:</b></p> <p>Elements of the building likely to be disturbed: (e.g. walls, doors, electrical systems etc.)</p> <p>Who will undertake the proposed work?</p>	
<p><b>Please forward to: -</b>                  Estates Help Desk Tel: 0118 378 7000                  Whiteknights                  PO Box 235                  Reading RG6 6BW</p>	
<p><b>ESTATES AUTHORISATION</b>  <b>(For Estates Use)</b></p>	
<p><b>Name: Signed: Date:</b>  <b>Work Authorised / Not Authorised to Proceed (delete as applicable)</b>  <b>Reason (if Not Authorised):</b></p>	



## Appendix 2 Labelling of Asbestos Containing Materials

The core strategy of the Asbestos Management Plan is to provide an up-to-date Asbestos Register supported by effective management procedures. This system can be supported using labelling of ACMs in some instances.

The use of local warning signs and labels is beneficial in decreasing the chance of inadvertent damage and exposure. However, labelling may not always be considered, particularly where they may cause anxiety to the building occupants.

The labelling of ACMs is considered on a case-by-case basis by the Asbestos & Safety Compliance Adviser. Areas where ACMs will be labelled include:

- Areas only likely to be accessed by maintenance operatives and contractors such as boiler and plant rooms, loft spaces, ceiling voids and ducts
- Areas where it is considered that there is a higher than usual risk of the ACM releasing fibres if disturbed such as sprayed materials
- Areas where it is considered that there is a higher than usual risk of ACMs being disturbed such as lining to columns in a high traffic area

Historically, some ACMs falling outside the above descriptions have already been labelled within University of Reading premises. It is recognised that to remove these labels whilst the ACMs remain is likely to lead to confusion and to the potential accidental disturbance of the material. These will be considered on a case-by-case basis by the Asbestos & Safety Compliance Adviser and removed only where the ACM in question is considered a low risk material. Similarly, the Asbestos & Safety Compliance Adviser must be consulted where it is proposed to paint over existing labelling.

The Asbestos Register must still be consulted on every occasion when intrusive work is proposed.

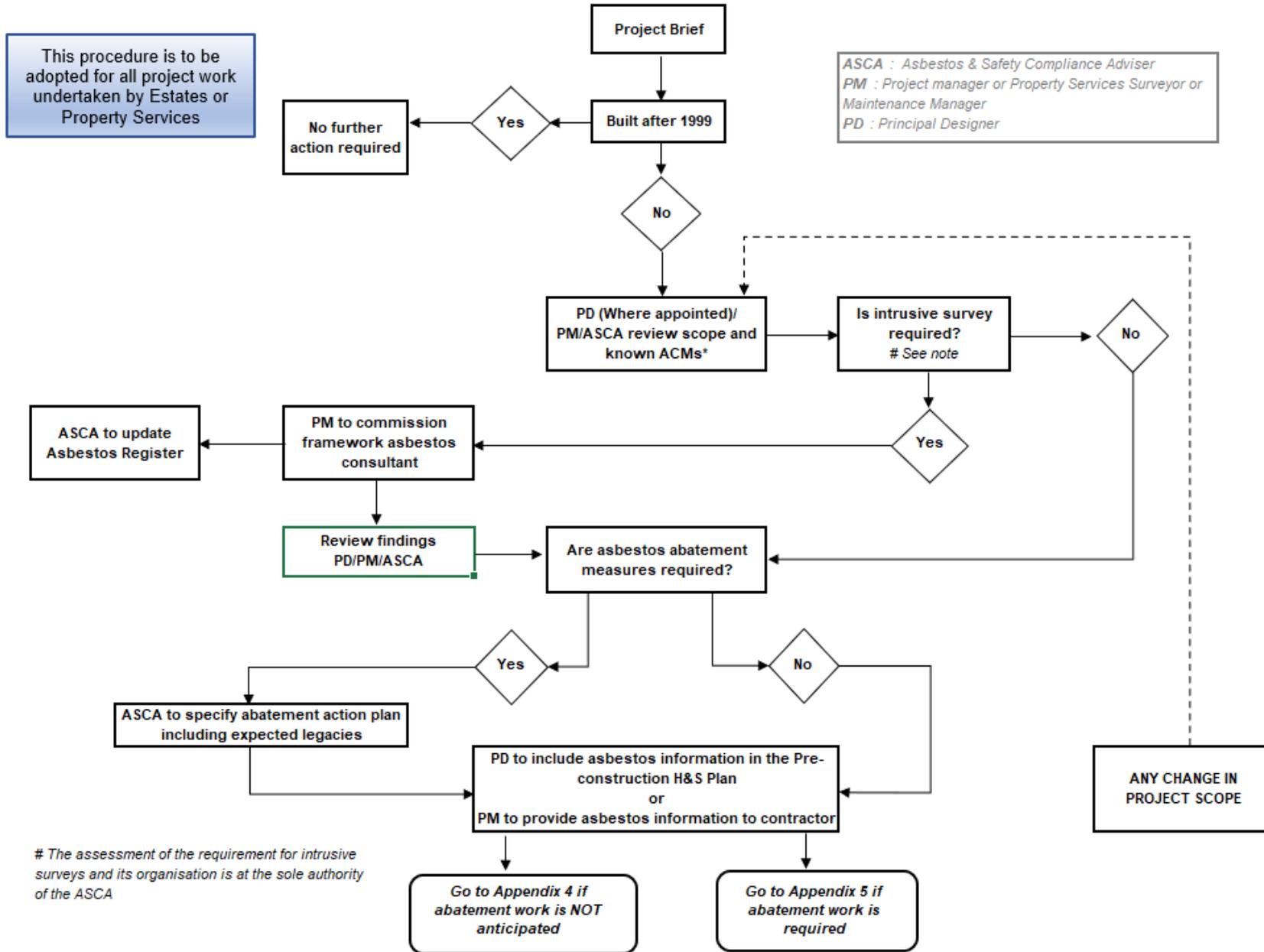
**Guidance:**

*If an asbestos label is present, it must be assumed that ACMs are present. Conversely, depending on location, the absence of a label does not mean that ACMs are not present. If in doubt, ASK.*

**Appendix 3 Management of Project Work – Preconstruction Phase (Figure 1)**

1. For all work in buildings constructed before 2000 Supervising Officer (SO) to advise the Asbestos & Safety Compliance Adviser of outline project brief.
2. SO/ASCA/Principal Designer (where appointed) jointly review known scope and known ACMs.
3. Asbestos & Safety Compliance Adviser will instruct whether further surveys are required before a suitable and sufficient assessment can be made.
4. The Project Manager will commission all asbestos surveys with assistance from the Asbestos & Safety Compliance Adviser
5. ASCA/Principal Designer (where appointed) jointly review findings.
6. Asbestos & Safety Compliance Adviser to advise on asbestos remediation action plan (where required) including advising of expected legacies.
7. SO to provide asbestos information to contractor or, where appointed, Principal Designer to include asbestos information in Pre-construction Health and Safety Plan.
8. Where asbestos remediation is not anticipated proceed to Appendix 4, Step 10.
9. Where asbestos remediation is required proceed to Appendix 5, Step 20.

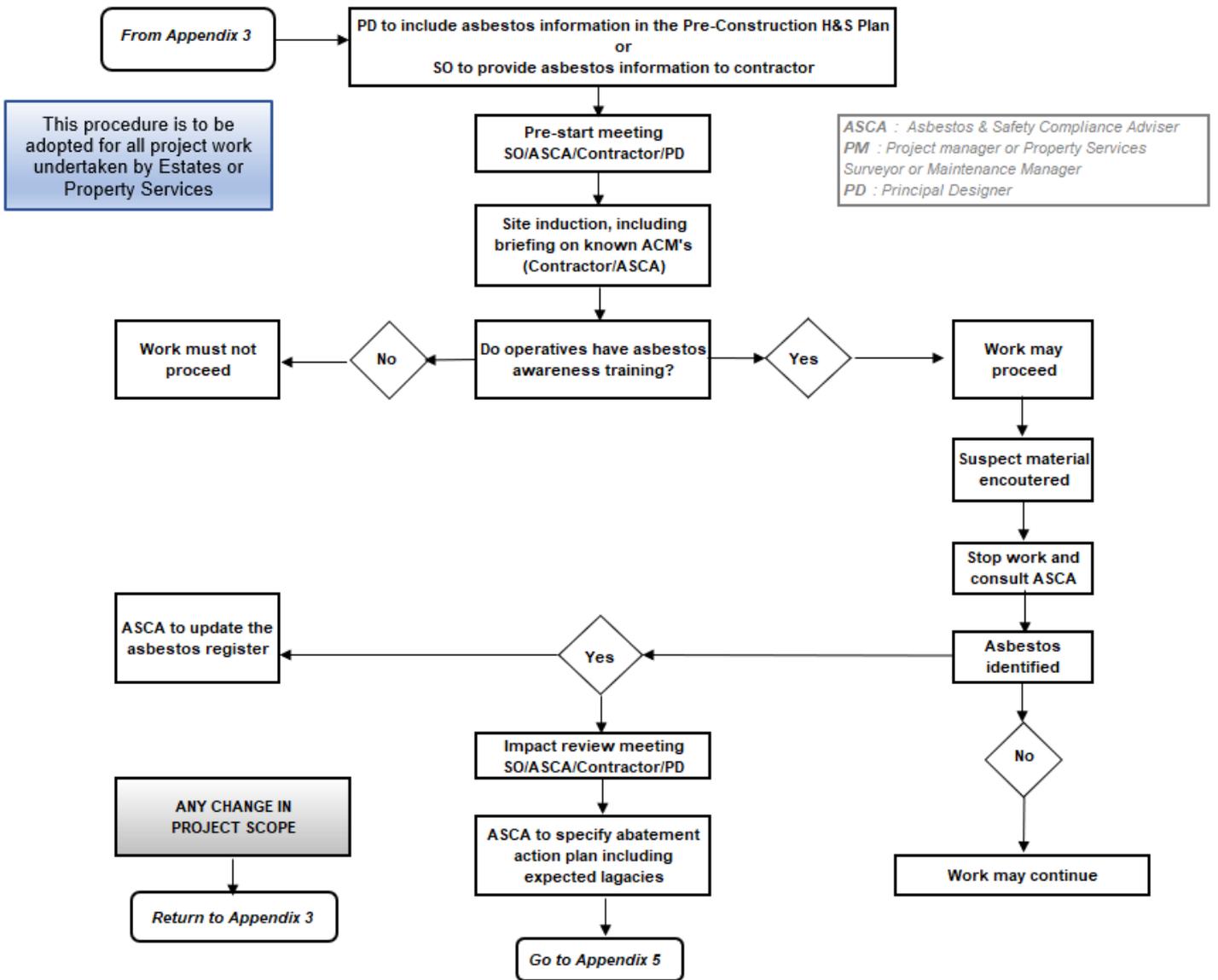
**Figure 1. Asbestos Management Plan for Project Work: Pre-Construction Phase**



**Appendix 4 Management of Construction Work – where remediation is not anticipated (Figure 2)**

10. Pre-start meeting SO/ASCA/Principal Designer/Contractor/Designer.
11. Site induction for all operatives including briefing on known ACMs.
12. Confirmation that all site personnel have asbestos awareness training.
13. Work may proceed.
14. IF suspect material encountered.
15. Stop work and consult Asbestos & Safety Compliance Adviser.
16. Impact review meeting where ACMs confirmed.
17. Asbestos & Safety Compliance Adviser to advise on asbestos remediation action plan (where required) including advising of expected legacies.
18. Where asbestos remediation is not required work may continue.
19. Where asbestos remediation is required proceed to Step 20.

**Figure 2. Asbestos Management Plan for Project Work: Construction Phase  
(Buildings constructed before 2000 where abatement isn't anticipated)**



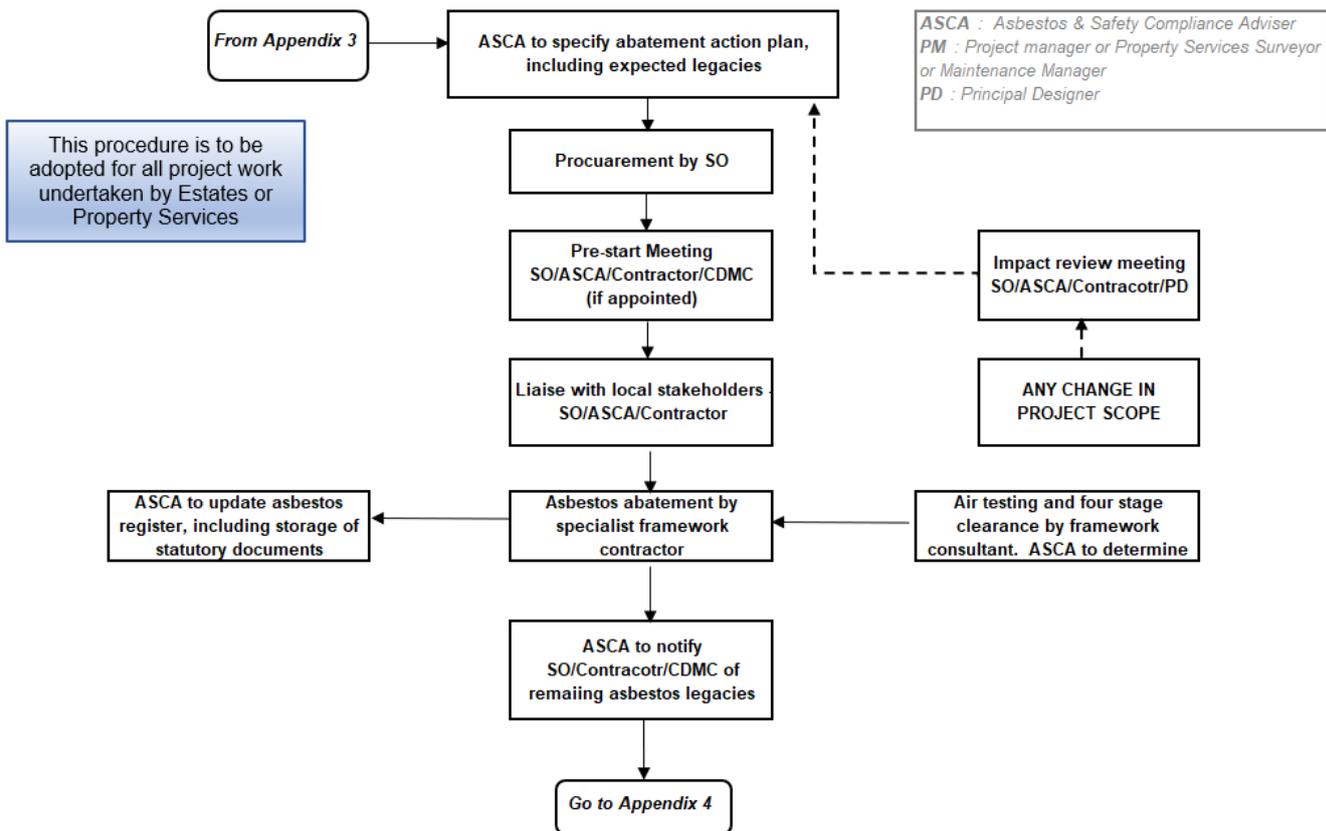
### **Appendix 5 Management of Construction Work – where remediation is required (Figure 3)**

20. Asbestos & Safety Compliance Adviser to specify remediation action plan including highlighting expected legacies to remain following work. Action plan to include extent of analytical support to be provided.
21. Procurement of asbestos contractor and analyst by PM/SO – PM & SO to agree who takes the lead in this.
22. Liaise with local stakeholders to agree working times, site layout and transit routes.
23. Asbestos remediation undertaken by specialist framework contractor.
24. Air testing and four stage clearance (where required) by specialist framework asbestos consultant. Scope as directed by Asbestos & Safety Compliance Adviser
25. Asbestos & Safety Compliance Adviser to update the asbestos register and notify SO/PC/Principal Designer of remaining asbestos legacies.
26. Project to proceed from step 10.

**Guidance:**

*Any change of project scope (at any time) must be reviewed and procedures from Appendix 3, Step 2 onwards repeated as required.*

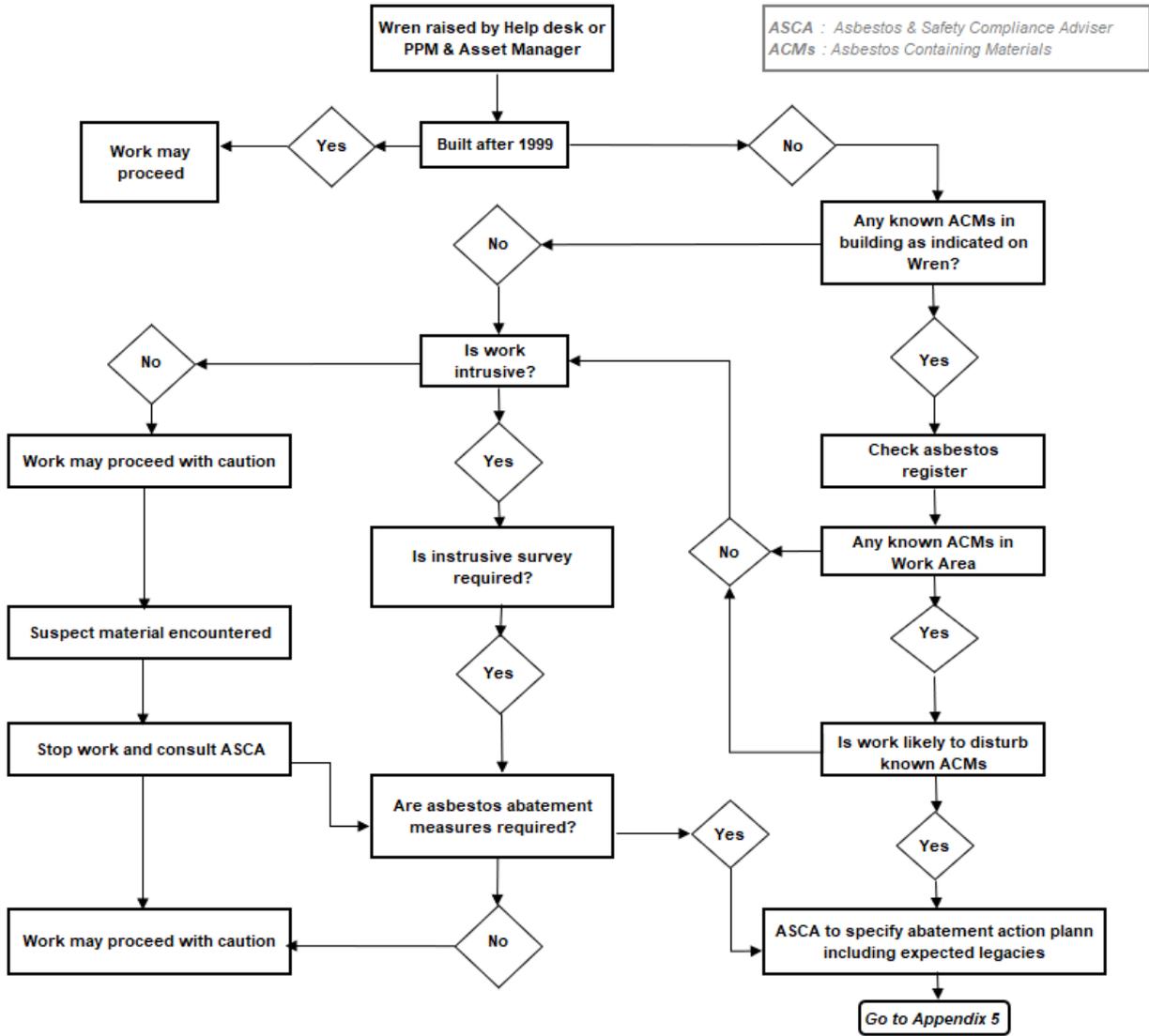
**Figure 3. Asbestos Management Plan for Project Work: Construction Phase  
(Buildings constructed before 2000 where abatement is required)**



## **Appendix 6 Management of Maintenance Activities – Reactive and Planned Maintenance by Direct Labour (Figure 4)**

1. Wren raised by Help desk or PPM & Asset Manager.
2. If property built after 1999 the wren will confirm under *Asbestos Details* that there was “**no asbestos used in the construction of this building**” and work may proceed.
3. If it is built before 2000, this information will be indicated by a warning on Wren under *Asbestos Details* to check the asbestos register.
4. Check the asbestos register.
5. Are there any known ACMs in the work location?
6. If yes is the work likely to lead to the ACMs being disturbed?
7. If yes, do not proceed, contact the Asbestos & Safety Compliance Adviser who will specify a remediation action plan.
8. Is the work intrusive?
9. If yes, do not proceed, contact the Asbestos & Safety Compliance Adviser who will instigate further inspections as necessary.
10. If you encounter a suspect material, stop work immediately, contact the Asbestos & Safety Compliance Adviser who will instigate further inspection and remedial action as necessary.

**Figure 4. Asbestos Management Plan for Reactive and Planned Preventative Maintenance by Direct Labour**



ASCA : Asbestos & Safety Compliance Adviser  
 ACMs : Asbestos Containing Materials

**Wren Warning**

If the work you are about to undertake is in a building constructed before 2000, and is deemed to be intrusive, please check with the university's Asbestos and Safety Compliance Adviser before proceeding.

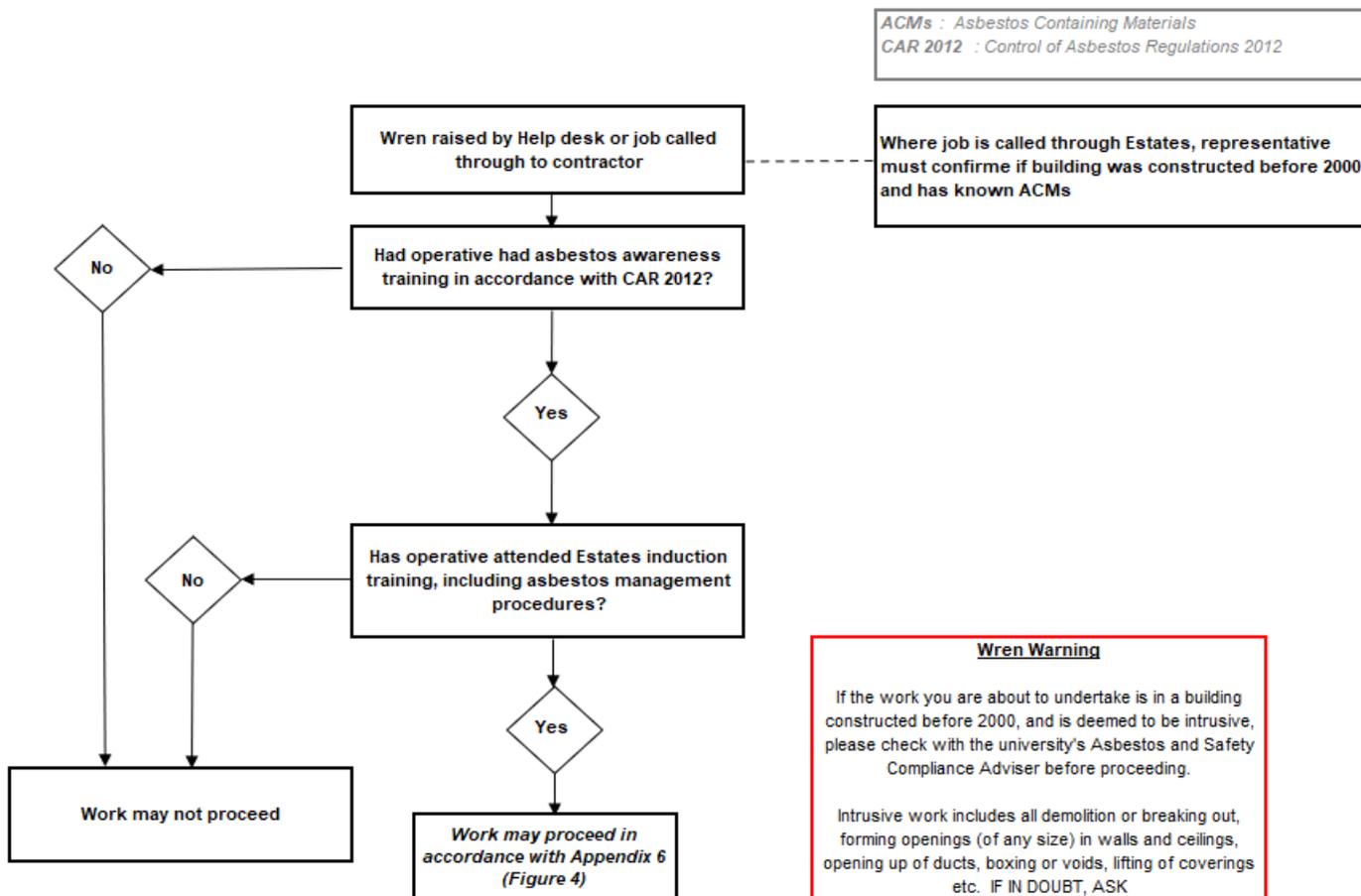
Intrusive work includes all demolition or breaking out, forming openings (of any size) in walls and ceilings, opening up of ducts, boxing or voids, lifting of coverings etc. IF IN DOUBT, ASK

# The assessment of the requirement for intrusive surveys and its organisation is at the sole authority of the ASCA

### Appendix 7 Reactive and Planned Maintenance by Subcontractors (Figure 5)

1. Work can be issued to subcontractors by various means:
  - By purchase order to head office
  - By Wren to on-site personnel
  - By telephone to head office or on-site personnel – caller will confirm if the building was constructed before 2000 and also if there are known ACMs
2. Has operative attended asbestos awareness training in accordance with Control of Asbestos Regulations 2012?
3. Has operative been briefed on Code of Practice 51 – Site Rules for working on University premises?
4. If ‘yes’ work may proceed in accordance with Appendix 6

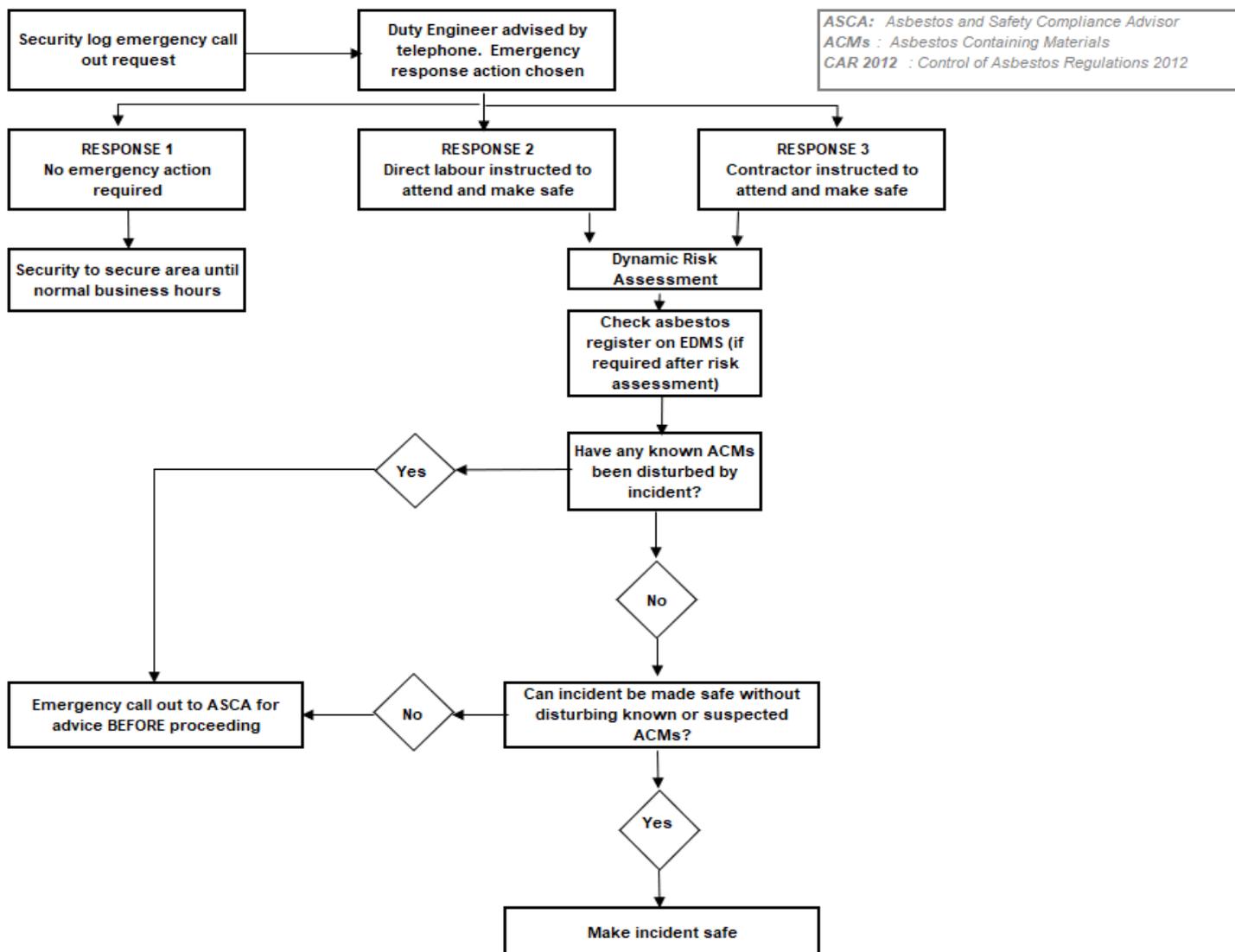
**Figure 5. Asbestos Management Plan for Reactive and Planned Preventative Maintenance by Subcontractors**



**Appendix 8 Emergency callout for Reactive Maintenance (Figure 6)**

1. Security log emergency call out request.
2. Duty Engineer advised by telephone.
3. Duty Engineer chooses emergency response action:
  - No emergency action – Security to secure area
  - Direct labour instructed to attend and make safe
  - Contractor instructed to attend and make safe
4. Attending personnel undertake dynamic risk assessment.
5. Are ACMs suspected – check asbestos register on EDMS
6. Have any known ACMs been disturbed by the incident – emergency call to Asbestos & Safety Compliance Adviser before proceeding further.
7. Can incident be made safe without disturbing known or suspected ACMs? If in doubt do not proceed – emergency call to Asbestos & Safety Compliance Adviser.

**Figure 6. Asbestos Management Plan for Emergency Call-out for Reactive Maintenance**



## **Appendix 9 Asbestos Management Plan for Accidental Disturbance of ACMs (Figure 7)**

1. The Site Manager (or other Senior Site Operative) should initially take control of the situation. Work must cease immediately. No effort should be made to clean up.
2. The Site Manager should, as soon as practicable, inform the Estates Help Desk (0118 378 7000), or the Security Control Room (0118 378 6300) if the incident is out of normal working hours. They will immediately notify the ASCA and relevant SO.
3. The Site Manager should arrange to clear the immediate area of all personnel. Personnel who may have been exposed to asbestos fibres on their clothing should be held at the perimeter of the area to allow an assessment of the extent of potential contamination on clothing in accordance with Figure 7.
4. The ASCA or SO will attend with a supply of disposable RPE/PPE to support this assessment. These are available in an emergency from the maintenance stores department in building W050.
5. As soon as practicable the Site Manager must advise the Building Support Officer, or in their absence the Departmental Secretary, Senior Technician, Health and Safety Co-ordinator, and other key occupants where appropriate.
6. After potentially contaminated staff have been satisfactorily decontaminated and removed, the ASCA or a designated Asbestos Consultant will access the affected area with appropriate personal protective equipment and assess the situation. Where the ASCA is unable to confirm or dismiss the presence of damaged ACMs samples will be taken for analysis.
7. The material shall be presumed to be an ACM and the area should be adequately sealed until such time as results to the contrary are received.
8. At the direction of the ASCA the asbestos consultant will run air monitoring tests within the suspected area of contamination and in strategic locations in surrounding areas.
9. If ACMs are confirmed the ASCA will develop and instigate remedial action plan in accordance with this AMP. No access will be permitted into the area to non-specialist asbestos personnel until all work is complete and confirmed by the ASCA.
10. ASCA to log the incident on the University incident reporting portal at <https://www.reading.ac.uk/internal/health-and-safety/IncidentReportingandEmergencyProcedures/IncidentNotification/>
11. The ASCA will investigate the incident and provide a report to the Health and Safety Services Director. The report will include recommendations on whether the incident should be classed as a “dangerous occurrence”. If it is, it should be notified by Health and Safety Services to the Health and Safety Executive under the Reporting of Injuries, Disease and Dangerous Occurrences Regulations 2013.
12. The ASCA must make arrangements to inform all persons who might have been exposed to the uncontrolled release of asbestos of their potential exposure. Where these are University staff, advice will be made available from Occupational Health.

**Following any incident of uncontrolled release of asbestos fibres this AMP will be reviewed by the ASCA.**

Figure 7. Asbestos Management Plan for accidental disturbance of suspect material

