

Asbestos Management Plan

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Introduction

- 1.1 This plan relates solely to the management of Asbestos Containing Materials (ACM) at the University of Portsmouth. It is a live document and will be reviewed at regular planned intervals or reactively if there is a reason to do so due to changes in legislation, guidance or circumstances within the University.
- 1.2 The University Asbestos Management Plan sets out the measures to ensure that asbestos management of the University is compliant with current legislation and the University Asbestos Safety Arrangement document.
- 1.3 Within the University, asbestos can be found in the following forms:
 - a) Thermal insulation - on pipes and boilers
 - b) Insulation boards - for fire protection, as thermal and acoustic insulation on walls, ceilings and structural steelwork
 - c) Ropes and gaskets - as a sealing material or for filling gaps
 - d) Asbestos cement - in wall claddings, partitions, roofing, or guttering
 - e) Textured decorative coatings – wall and ceiling coatings (commonly known as Artex)
 - f) Flooring – Thermoplastic tiles and adhesives
 - g) Within bitumen containing roofing products
- 1.4 Asbestos may also be present in laboratories inside old equipment such as ovens, furnaces and autoclaves to provide heat protection or insulation.
- 1.5 The installation of ACM was completely banned in the UK in 1999. Therefore, any new build construction on or after the year 2000 can be assumed not to contain ACM. However, many university buildings built before 2000 still contain asbestos materials. Provided these are managed and monitored, they will remain safe and there is no reason to remove or disturb ACM unless it becomes absolutely necessary due to repair or refurbishment work.

Definitions

- 2.1 **Asbestos Containing Material (ACM)** – Composite material that had asbestos fibres incorporated into its construction when it was manufactured.
- 2.2 **Asbestos Register** – A consolidated list of all known ACM across the entire campus which describes the location, type of material, condition and management requirements for each item.
- 2.3 **Licensed asbestos work** – Work involving ACM which is not sporadic or of short duration and / or the risk assessment cannot clearly demonstrate that the control limit for asbestos work will not be exceeded. Licensable work may only be carried out by an organisation that holds a licence from HSE to work with

ACM. For all licensable work, a notification must be submitted to HSE at least 14 days in advance of the start of work. This will be submitted by the asbestos removal contractor.

- 2.4 **Non-licensable asbestos work** – Work involving ACM which is low risk and doesn't require an HSE licence to carry out. However, the person carrying out the work must be adequately trained and equipped to complete the task under suitable controlled conditions. Some non-licensed work may become notifiable to the HSE due to being long duration work or poor condition of the material. Notifiable Non-Licensed Work can be notified to the HSE on the day of the work.

Note: University Asbestos Safety Arrangement states that ALL work on campus that involves ACM, whether licensable or non-licensable may only be undertaken by a HSE licensed contractor.

Responsibilities

- 3.1 Refer to the [Asbestos Safety Arrangement \(UoP-HS-P-30\)](#)

Training and Competency

- 4.1 The Asbestos Responsible Person (ARP) and Deputy will be trained to a minimum standard of BOHS P405 'Management of Asbestos in Buildings'.
- 4.2 Asbestos awareness training is provided to University employees when requirements are identified. Refresher training is provided every 3 years and consists of a bespoke presentation by the ARP. The following groups of University staff are to attend this asbestos awareness training:
- Estates managers involved with the management of projects and maintenance
 - Estates Reactive Maintenance Team
 - Caretakers
 - Accommodation Services Managers, Service & Housekeeping Supervisors and Service & Facilities Assistants
 - Faculty / Department managers and staff who have equipment that contains or may contain ACM and / or who engage contractors whose work could disturb the fabric of buildings
- 4.3 Contractors whose work involves the potential to disturb ACM shall have provided asbestos awareness training to their employees in order to be included on the approved contractors list. This training must be to a recognised standard such as UKATA asbestos awareness training or equivalent (formal in-house training is acceptable if it provides the same standard).

- 4.4 Asbestos surveyors and analysts are fully qualified (minimum P402) and the company is UKAS accredited to carry out sampling and laboratory analysis of suspected ACM.
- 4.5 Specialist asbestos removal contractors are selected through being holders of a current HSE licence to carry out licensed asbestos work. They must also be members of the Asbestos Removal Contractors Association (ARCA) and / or Asbestos Control and Abatement Division (ACAD).

Record Keeping

- 5.1 Records of employee asbestos training will be recorded on individual iTrent records. Managers are to maintain their staff training records.
- 5.2 All documents relating to asbestos work, historical re-inspection, refurbishment and demolition surveys are stored in erecords. This enables relevant employees to view asbestos survey reports for all building that have identified ACM content. If further information is required please contact the ARP / DARP.
- 5.3 A single asbestos register document is stored on the K Drive (Central / Estates / Health & Safety / Asbestos / UoP Asbestos Register). Data contained within the asbestos register is frequently reviewed and updated in reaction to any refurbishments or major projects within the University Campus along with asbestos removal, encapsulation and environmental cleaning works that are carried out.
- 5.4 Asbestos information is also stored on the Estates computer aided facilities management (CAFM) system and provides a warning to tradespersons when they are about to start work in a space that has known ACM in it. This is updated when any changes to asbestos data are required.
- 5.5 Records of any asbestos work or surveys will be kept in the erecords system for at least 40 years in line with the University retention policy.

Communication and Consultation

- 6.1 The University has a duty to warn staff or contractors of the presence of asbestos, so that those intending to work on or near it can take proper precautions to avoid accidental damage or disturbance.
- 6.2 The Asbestos Safety Arrangement and this AMP are displayed on the University H&S Policy intranet pages.

- 6.3 This AMP is shared with the E&CS Health, Safety and Wellbeing Committee for consultation prior to being published. It is also shared with relevant internal departments and key managers to ensure their understanding and approval.
- 6.4 Contractors who carry out work with mechanical or electrical services and / or building fabric are given a Health, Safety and Environment induction by the E&CS Health and Safety Compliance Team. This includes general awareness of asbestos risk at the University.
- 6.5 Project Managers ensure that relevant asbestos information is provided to contractors prior to any intrusive repair or refurbishment work starting. An Asbestos Work Plan form (Appendix C) is provided to facilitate full consultation for all work where ACM may be present and be disturbed.
- 6.6 The University Asbestos Register is shared with relevant maintenance contractors and internal departments whose work could disturb ACM.

Audit and Review

- 7.1 The Asbestos Management Plan shall be reviewed at least annually by the ARP to ensure it remains valid and effective in conjunction with University policies and working practices. Review of the plan may also be carried out by the ARP following an asbestos related incident or a failure in procedure relating to asbestos control.
- 7.2 The Health, Safety & Compliance Team will carry out periodic auditing of procedures and systems reviews to ensure that related procedures and working practices remain compliant. Occasional audit of ACM related work will also be undertaken as necessary to ensure compliance with legal requirements.

Procedures

8.1 Survey and Assessment of Buildings

- 8.1.1 The University has appointed Gully Howard Technical Ltd to carry out asbestos surveys (re-inspection of known ACM and ad hoc sampling and survey where required) across all University buildings.
- 8.1.2 Asbestos survey reports are presented in an electronic format compatible with the current University IT systems and asbestos register and they provide the following minimum information:

- Purpose and date of survey
 - Annotated floor / site plans indicating sampling points and unique references
 - Register of site findings
 - Risk assessment scores for each identified ACM
 - Recommendations for monitoring, repair or removal of ACM
- 8.1.3 A programme of annual re-inspections of known ACM is carried out which is maintained and updated by Gully Howard in consultation with the ARP / DARP.
- 8.1.4 For any reactive maintenance work or planned refurbishment / project work where the presence or extent of ACM is not fully known, a refurbishment survey is undertaken in consultation with the ARP / DARP.
- 8.1.4 Careless or poor sampling technique may result in uncontrolled release of fibres from ACMs. Asbestos survey / sampling is not be undertaken by any staff or contractors who are not specifically appointed by the ARP /DARP to carry out this task. Only competent persons (e.g. an appointed asbestos survey organisation) are permitted to take samples for analysis.

8.2 Asbestos Register

- 8.2.1 A copy of the asbestos register has been shared with measured term contractors, Information Services, Security, Estates project managers, maintenance managers and tradespersons. The Estates Duty Manager also has access to the asbestos register in case of any potential queries or issues that may occur outside of normal working hours.
- 8.2.2 In locations where no asbestos has been detected, this doesn't necessarily mean that there is no asbestos in the building, only that none has been found during previous asbestos surveys or that all known asbestos has been removed. If there is any uncertainty as to the accuracy of the details in the register then further clarification must be sought from the ARP / DARP.
- 8.2.3 For any works that are likely to disturb the fabric of the building, you must check with the ARP / DARP before starting work. A refurbishment / demolition asbestos survey may be required prior to starting any intrusive work.

8.3 Management of Asbestos Containing Materials

8.3.1 Planning for Repair / Removal of ACM

- 8.3.1.1 When planning any repair, refurbishment or demolition work, it is imperative that any work to ACM is meticulously planned to ensure that all parties have full knowledge of the scope of work to be completed. This is to prevent any possibility of ACM work being carried out incorrectly or inadvertent disturbance of ACM by other parties.

- 8.3.1.2 At the pre-construction stage of any planned work, a detailed written Asbestos Work Plan must be produced and this must be agreed with the ARP and UoP PM / Maintenance Manager. The plan will be developed throughout the planning, design and construction phases incorporating information from relevant documents such as existing floor plans, proposed design, asbestos register, asbestos surveys and any asbestos removal plan of work.
- 8.3.1.3 In all cases, the asbestos work must not start until the ARP / DARP has provided written approval that the Asbestos Work Plan is suitably developed and that planning, communication and coordination has been received and understood by all parties.

8.3.2 Programme of ACM Remediation

- 8.3.2.1 Following annual asbestos reinspections, the ARP and DARP work in conjunction with Gully Howard Technical Ltd to identify ACM that requires repair, environmental cleaning or removal. A programme is compiled and is implemented in accordance with identified risk levels and assessment of priorities. A refurbishment / demolition survey may also be required prior to arranging some of this work.
- 8.3.2.2 Where repair, remediation or removal of ACM is determined to be necessary, the University will only engage the services of HSE licensed asbestos contractor specialists to work on any ACM product (this is regardless of whether it is licensed or non-licensed work). This will be arranged by the ARP, Estates maintenance or project managers or (in the case of major project) the Principal Designer / Principle Contractor. The licensed asbestos contractor produces a 'Plan of Work' for the Project Manager / Principal Contractor as to how the asbestos will be removed in compliance with current legislation.
- 8.3.2.3 Contractors who do not hold a HSE licence are **never** to carry out any work that is likely to disturb known ACM. University of Portsmouth employees must also **never** carry out / arrange any work with ACM.

8.3.3 Planned and Reactive Work Orders for RMT / Contractor

- 8.3.3.1 Where any planned or reactive maintenance or repair work is ordered where the fabric of the building could be disturbed, the supervisor / tradesman is to check the asbestos register before starting work.
- 8.3.3.2 If there are no concerns about asbestos, the work can begin when the appropriate planning and safe systems of work have been implemented.
- 8.3.3.3 If there is any uncertainty about the presence of asbestos (or if ACM is confirmed), then work must not start until further consultation and an Asbestos Work Plan is made in conjunction with the ARP / DARP.

8.3.4 Major refurbishment projects

- 8.3.4.1 In advance of all major refurbishment and demolition work in buildings that were constructed prior to the year 2000, a refurbishment / demolition asbestos survey **must** be carried out as recommended in HSG 264: 2012 – Asbestos – A Survey Guide. All information from the survey shall be made available to the Principal Designer and Principal Contractor and included in the pre-construction information (in conjunction with the Asbestos Work Plan).

8.3.5 Work carried out on behalf of Faculties / Departments within the University

- 8.3.5.1 Prior to commencement of any work where there is a possibility of disturbing ACM (however minor), the manager who is intending to commission work shall contact the ARP or DARP to check the asbestos register and provide advice. No work is to start until a plan is implemented in conjunction with the ARP / DARP and the relevant Estates maintenance or project manager.

8.3.6 Control of ACM During Building Work (Not Removal)

- 8.3.6.1 Where a decision is taken by the University not to remove ACM during building work then precautionary measures shall be put in place:

- Information regarding ACM shall be made available to the contractor prior to the commencement of works.
- The Contractor shall provide details of the measures to be taken in order to protect the ACM from damage / disturbance arising from the works.
- Routine airborne monitoring of the working area may be requested as reassurance that the work is not disturbing ACM. This will be determined in conjunction with the ARP and the asbestos analyst.

Access controls need to be put in place to prevent unauthorised entry and potential ACM disturbance.

8.3.7 Asbestos Containing Materials in Faculty / Department Equipment

- 8.3.7.1 The asbestos register and AMP relate to the whole University and not only the fabric of buildings. The head of department / faculty must ensure that the department under his / her control provides the ARP with detailed information of the location, type and condition of ACM in any non-Estates managed items (kilns, ovens, autoclaves, etc.) where known or suspected so that it can be included in the asbestos register.
- 8.3.7.2 Departmental staff may not be aware that certain older items of equipment may contain ACM (such as heat insulation panels). They should seek advice from the ARP if there is any doubt about the nature of the materials they are working with. The Corporate Health, Safety & Compliance Team / ARP will organise asbestos awareness training as required for identified relevant staff.

8.3.8 Labelling of ACM

- 8.3.8.1 ACM in the building fabric and laboratory equipment identified as containing asbestos may be marked with warning labels but this is normally in enclosed spaces such as plant rooms and service risers. However, some open areas do have asbestos warning labels visible.
- 8.3.8.2 The ARP is responsible for labelling the building fabric where considered appropriate and advice is sought from the asbestos analyst if necessary.
- 8.3.8.3 If an asbestos label is not present, this is not conclusive proof that no ACM exists. If there is any doubt about the material type, always contact the ARP / DARP for advice before proceeding with any work.

8.3.9 Air Monitoring

- 8.3.9.1 Air testing may be required for some ACM work and this is always carried out by an analyst to test whether an area has any airborne asbestos fibres present. The analyst is always appointed by UoP to ensure they are acting independently of the asbestos removal contractor. On completion of any air testing, the analyst shall produce a written report and send it to the Project Manager or ARP / DARP.
- 8.3.9.2 Clearance air testing is always carried out by the analyst following any removal of asbestos products that require notification to the HSE.
- 8.3.9.3 Reassurance Air Monitoring is carried out in areas considered sensitive or in situations where it is considered necessary to determine whether fibres have been released and provide documentary evidence. Reassurance air monitoring is carried out at the discretion of the ARP / DARP.

8.4 Controlled Removal of Waste Asbestos

- 8.4.1 Waste ACM is defined as “hazardous waste” and it must not be disposed of in normal waste streams.
- 8.4.2 During asbestos removal and environmental cleaning works, ACM is double bagged / wrapped by the licensed contractor. Bags are sealed, labelled and cleaned prior to removal from the enclosure.
- 8.4.3 Bags containing asbestos waste are transported along an agreed route for immediate removal from site or safe storage within a lockable container located in an agreed position on site.
- 8.4.4 Final disposal of these items is arranged by the licensed asbestos removal contractor. All asbestos waste is disposed of strictly at a site licensed to receive it in accordance with the Hazardous Waste Regulations. The licensed asbestos

contractor is responsible for disposal of asbestos waste and provides the University with documentary evidence (waste consignment note).

- 8.4.5 **Faculty / department equipment** that is known to contain ACM must be disposed of as hazardous waste via a licensed removal contractor. No attempt is to be made to dismantle it by University employees. The licensed contractor will carry out the wrapping and removal under their controlled procedures. University Department heads are responsible for informing the ARP of any equipment which may contain ACM and are responsible for the cost of inspection and management of the disposal of such items.

8.5 Emergency Procedure

8.5.1 Reporting of Damaged Asbestos Containing Materials

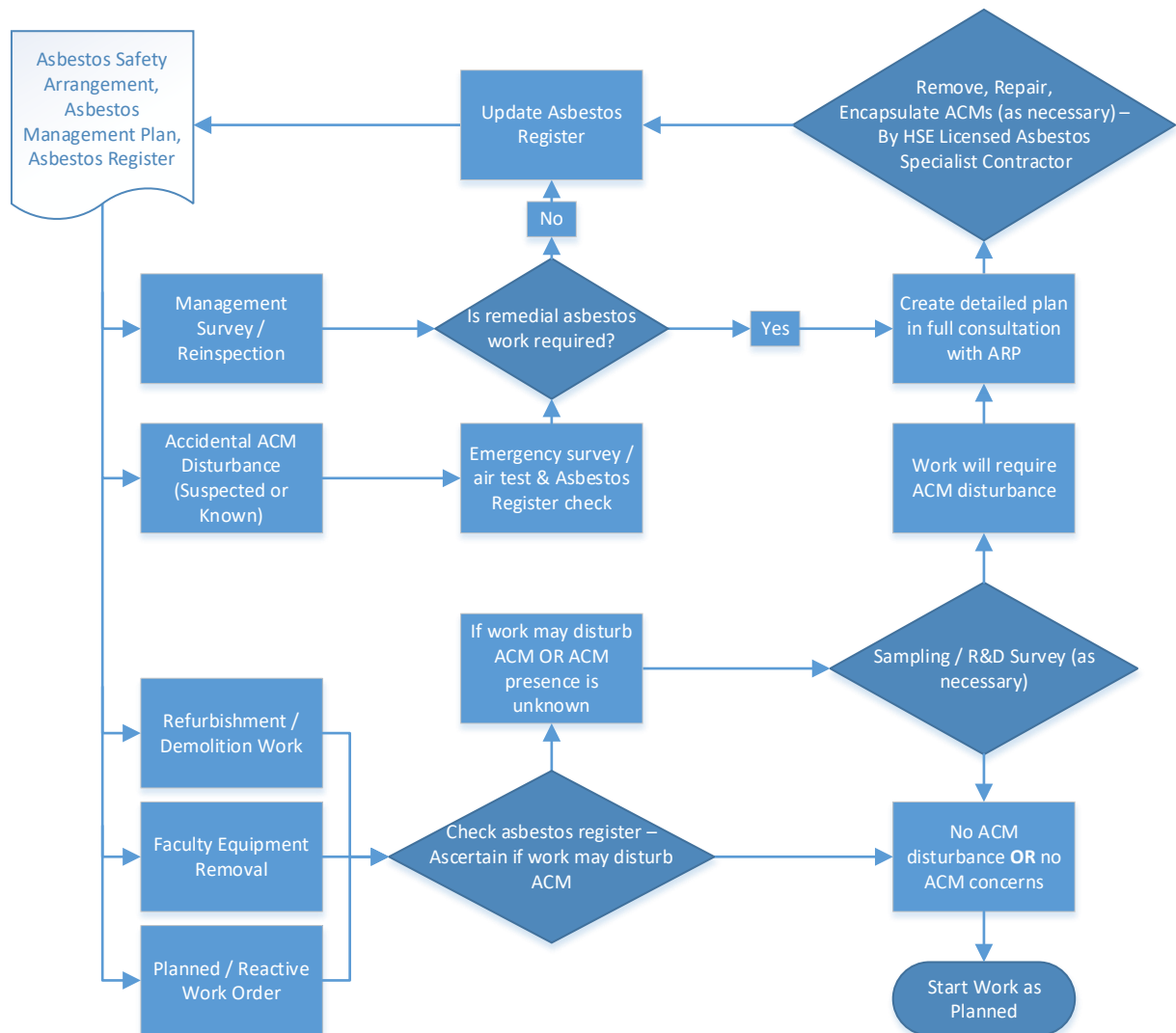
- 8.5.1.1 If materials are found to be damaged, or have deteriorated, and it is known or suspected to be ACM, the Estates Helpdesk / ARP / DARP must be informed so that steps can be taken to assess the situation and deal with it appropriately.
- 8.5.1.2 The following actions must be taken:
- a) Stop work
 - b) Isolate the area i.e. shut doors and windows
 - c) Post warnings and prevent anyone entering the area
 - d) Avoid potentially spreading asbestos fibres – If any clothing is contaminated with dust or debris, stay put and request assistance. Clothing may need to be carefully removed and placed in a sealed plastic bag until testing of the disturbed material has been completed.
 - e) Report the problem as soon as possible to the person in charge of the project and to the ARP.
 - f) If a member of University staff is involved and there are any concerns about potential exposure, they must be referred by their manager to the University Occupational Health Service for consultation, baseline assessment and monitoring by an appropriate healthcare professional.

8.5.2 Suspected ACM Discovered During Construction Projects

- 8.5.2.1 In circumstances where a 'site' is under the control of a Principal Contractor and known or suspected ACM is discovered, the Procedures contained in the Construction Phase Health and Safety Plan shall be followed and the Project Manager informed as soon as practical.
- 8.5.2.2 The following points should be noted:
- **Do not** allow work to continue on any materials that are suspected of containing asbestos.

- If suspected ACM has been damaged or disturbed during work, the materials must be left in-situ, the work suspended and the area isolated pending further investigation.
- **Do not** attempt to take a sample. The act of sampling asbestos can expose the sampler to dangerous levels of fibres and it is possible to contaminate the surrounding area.
- Samples shall **only** be taken by a UKAS accredited organisation that is approved to sample and test for ACM.

Appendix A - Asbestos Management Flowchart



Appendix B - University Buildings – Asbestos Status

| Building | Asbestos status |
|---|--|
| Residential Buildings: | |
| Bateson Hall (Block B to F) | Asbestos present |
| Burrell Hall | Asbestos present |
| Harry Law | No asbestos detected |
| Langstone Flats East & West | Asbestos present |
| Langstone Trust Hall | No asbestos detected |
| Langstone QEQM Barnard Tower | Asbestos present |
| Rees Hall | No asbestos detected |
| Non- Residential Buildings: | |
| Anglesea (+ Lodge) | Asbestos present |
| Anglesea Data Centre | New build – no asbestos |
| Bateson A Block | Asbestos present |
| Buckingham | Asbestos present |
| Burnaby | Asbestos present |
| Burnaby Terrace | No asbestos detected |
| Cell Block (Dockyard) | No asbestos detected |
| Dennis Sciama | New build – no asbestos |
| Dental Academy | New build – no asbestos |
| Durham Street | Asbestos present |
| Eldon | Asbestos present |
| Gun House / Terrace Café | Asbestos present |
| Halpern House | Asbestos present |
| Hampshire Terrace (No. 6 – 8) | Asbestos present |
| IMS (B Block, D Block, S2 Outbuilding, S7 Toilet) | Asbestos present |
| King Henry | Asbestos present |
| Langstone Sports Office + Flat 10 | Asbestos present |
| Langstone Changing Room A | New build – no asbestos |
| Langstone Centre & Changing Room B | Asbestos present |
| Langstone Boiler House | Asbestos present |
| Langstone Laundry & TSF13 | No asbestos detected |
| Langstone Security Lodge | Asbestos present |
| Lion Gate | Asbestos present |
| Lord Montgomery Way (No. 1-13) | Asbestos present |
| Mercantile | Asbestos present |
| Middle Street (No. 36 – 40) | Asbestos present |
| Milldam | Asbestos present |
| Park | Asbestos present |
| Petersfield Research Centre | Asbestos present (Southern Water site) |
| Port Royal Street | Asbestos present |
| Portland | Asbestos present |
| Ravelin House | Asbestos present |

| | |
|---------------------------------------|-------------------------|
| Ravelin Sports Centre | New build – no asbestos |
| Richmond | New build – no asbestos |
| Rosalind Franklin (Ground Floor only) | No asbestos detected |
| Spinnaker Building | New build – no asbestos |
| St Andrews Court | No asbestos detected |
| St George's | Asbestos present |
| St Michael's (New) | Asbestos present |
| St Michael's (Old) | Asbestos present |
| St Paul's Gym & Annexe | Asbestos present |
| Student Centre | New build – no asbestos |
| Technopole Building | New build – no asbestos |
| University House | Asbestos present |
| University Learning Centre | New build – no asbestos |
| University Library | Asbestos present |
| University Security Lodge | No asbestos detected |
| Victoria House (Hampshire Terrace) | Asbestos present |
| William Beatty | New build – no asbestos |
| Wiltshire | Asbestos present |

Please note the following points:

- 'New build' means that the building was constructed on or after the year 2000 and therefore would not have any ACM in its construction.
- Where a building is noted as 'No asbestos detected', this doesn't necessarily mean that there is no asbestos in the building, only that none has been found during previous asbestos surveys or that all known asbestos has been removed. For any works that are likely to disturb the fabric of the building, you must check with Estates before starting work as an asbestos survey may be required before starting work.
- Where asbestos is already known to be present, check with Estates as to the nature and condition in the area where work is to be done. There is also a possibility that further unknown ACM may be present so for any work that is likely to disturb the fabric of the building, an asbestos survey will be required.

Appendix C – Asbestos Work Plan



Project Details:

| | |
|---|--|
| Project / Work Order Title: | |
| Project / Work Order Number: | |
| Building Name / Address: | |
| Brief Description of the Required Work: | |

Relevant Contacts:

| Organisation | Contact Name | Email Address |
|--------------|--------------|---------------|
| | | |
| | | |
| | | |
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| | | |

Type of Asbestos Work Required (confirm all that apply):

| | | | | | |
|-------------------|------------|------------------------|-----------------------|----------------------|------------------------|
| Management Survey | R&D Survey | Asbestos Remedial Work | Asbestos Removal Work | Reassurance Air Test | 4 Stage Clearance Test |
| | | | | | |

Detailed Asbestos Work Requirements:

| Room Reference / Space Number | Work requirement |
|-------------------------------|------------------|
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| | |
| | |
| | |

Details of specialist equipment / conditions (i.e. work at height, electrical isolation, lift engineer attendance, chaperone required, etc.):

| |
|--|
| |
|--|

Documents to be Provided:

| Document | Required? (Yes / No) | Date Provided |
|--------------------------------|-------------------------|---------------|
| Building plans | | |
| Design documents | | |
| Construction phase plan | | |
| Asbestos register | | |
| Asbestos surveys | | |
| Asbestos removal plan of works | | |
| Other (specify): | | |

Notes:

- This work plan must be compiled at the pre-construction stage of any project where asbestos material may be encountered.
- It will be developed throughout the project and used to ensure the Construction Health and Safety Plan contains accurate details for the safe and correct management of ACM.
- Construction phase work must not start until the full scope of asbestos work is confirmed and communicated to all parties.