



# Management of Asbestos-containing materials

Guidance

<i>Doc control no: PRSG18.2</i>		WELLBEING, SAFETY AND HEALTH MANAGEMENT SYSTEM					
Author:	HSS/ FD	Approved by:	FF	Version number:	2	Issue Date:	March 2019

## Introduction

The use of asbestos and 'asbestos containing materials' (ACMs) was widespread in building work from the 1930s to 1999. Asbestos containing materials were popular due to their resistance to fire and heat, as well as providing an affordable and easily integrated solution in many building and manufacturing products.

Since 1999 the European Union and the UK have banned all import and use of asbestos.

The mere presence of asbestos within a building does not necessarily present a risk; it is only when it is physically disturbed that harm can be caused. For instance, the Health and Safety Executive (HSE) only recommends the removal of ACMs when they are in poor condition or will be disturbed by removal works. It is therefore important (before undertaking any work likely to disturb the fabric or fixtures of a building built before 2000) that the Asbestos Management Team ([asbestos@leeds.ac.uk](mailto:asbestos@leeds.ac.uk)), based within Estate Services, are consulted to ensure ACMs are **not** present or impacted by the work being carried out. Depending upon the proposed works, intrusive surveys may be required.

Due to its heat and chemical resistant nature, asbestos may also be found within equipment housed within faculty areas ie; fume cabinets; fire doors; high-temperature ovens and kilns. Any such equipment is subject to the same controls and limitations as the building fabric, and the Asbestos Management Team, should be consulted if it is believed that equipment may contain asbestos.

Any questions should be directed to a member of the [Asbestos Management Team](#) who are based within Estate Services and are contactable through a central email – [asbestos@leeds.ac.uk](mailto:asbestos@leeds.ac.uk)

## Definitions

### Definitions:

**Asbestos Containing Material (ACM)** - Asbestos itself is a series of naturally occurring fibrous silicates often referred to as Chrysotile (white), Amosite (brown), and Crocidolite (blue) which can occur singly or in combination, often in building materials and occasionally in equipment.

Asbestos can be found in a wide range of products used in the construction of buildings i.e., textured wall coverings (e.g. artex), pipe lagging, fire-resistant boarding/blanket, lift shaft linings, partition walls, panels below and to the side of windows, soffits, ceiling tiles, guttering (this is not an exhaustive list).

- This protocol relates to all buildings and sites where the University has responsibility for maintenance activities. It covers both the fabric of the building and all equipment / fixtures housed within. For more information, contact the FD Estates Helpdesk or email [asbestos@leeds.ac.uk](mailto:asbestos@leeds.ac.uk)
- This protocol **does not** include rocks and other samples known – or suspected - to contain naturally-occurring asbestos and which are sometimes kept in faculties for teaching or research purposes. These should be covered by the usual radiation, activity or hazardous substances risk assessment.

## Guidance

### 1. Appointment of a 'Duty Holder' and an 'Asbestos Responsible Person'

- **Duty Holder** –has '*an obligation of any extent in relation to the maintenance or repair of non-domestic premises or any means of access or egress to or from those premises*'.

They are appointed by the University Executive Group (UEG) to ensure systems are in place to manage the risk from asbestos on behalf of the University. As set out in the Asbestos Management Plan, the Director of Campus Development is named as duty holder.

- **Asbestos Responsible Person** – Based within Estate Services, and appointed by the Duty Holder to advise on compliance with statutory requirements, oversee any works impacted upon by asbestos containing materials, the management of asbestos-containing materials and to maintain the asbestos register.
- Further details of roles and actions can be found at the end of this document.

## **2. University Asbestos Management Plan (AMP)**

The AMP is produced and implemented by the Asbestos Responsible Person, in consultation with the Professional Services/ FD Health and Safety team. It contains the arrangement for the management of asbestos at the University, inclusive of emergency procedures and protocols. It is subject to an annual review and is approved by the Director of Estates.

## **3. Asbestos surveys and annual re-inspection of ACMs**

- An asbestos management survey has been undertaken for all University properties. This is managed by the Asbestos Management Team.
- Refurbishment surveys are undertaken on all pre-2000 buildings prior to any refurbishment / upgrade; the scope of these will be determined by the Asbestos Management Team. The survey may cover small scale localised works (ie. upgrade on carpets and doors) up to large scale full refurbishments of faculties. The survey will normally be out of hours – please make all efforts to facilitate access to these areas. Requests for access to buildings and rooms will come from either the Asbestos Management Team or the FD Estates member of staff responsible for the overall project.

## **4. Asbestos register and information**

- The Asbestos Register is owned and managed by FD Estates. It is maintained and updated by the Asbestos Management Team and helps to manage the risk of asbestos at the University.
- People authorised to carry out work on the fabric of the estate, buildings or services (for example some LUU, ISS (Cabling) and Facilities Directorate staff, and some FD Estates contractors) can obtain asbestos information from the Asbestos Register by contacting one of the following people:
  1. Asbestos Responsible Person;
  2. Asbestos Officer;
  3. Professional Services/ FD Health and Safety team;
  4. FD Health and Safety (Construction) Manager.

Contact details are available at:

[http://www.leeds.ac.uk/estate\\_services/contacts/index.html#safety](http://www.leeds.ac.uk/estate_services/contacts/index.html#safety)

## **5. Annual Re- inspection**

- Annual re-inspections are carried out on all known and suspected ACMs. This takes into account the asbestos management survey and information gathered on any refurbishment surveys undertaken.
- Asbestos re-inspections occur every 12 months, but sometimes the frequency may be more often, as detailed within the University Asbestos Management Plan. A notification of upcoming re-inspections will be made by the Asbestos Management Team and all efforts should be made to notify staff that access is needed to areas containing known or presumed ACMs.

- The Asbestos Register is updated following the annual re-inspection, or if there are any reports of change of condition to known or suspected asbestos-containing materials

## 6. Licensed Asbestos Removals Contractors (LARC)

- Asbestos removal work falls under three categories; Licensed Work; Notifiable Non-Licensed Work (NNLW); Non-Licensed Work. Under most industry-wide circumstances, a licensed asbestos removals contractor (LARC) will only be needed for licensed asbestos removal as NNLW and Non-Licensed work can be undertaken by those with adequate training. The University however, has taken the approach that **all** asbestos removal work will be undertaken by a LARC, thus ensuring that all works are carried out to the highest possible standards.
- Prior to starting removal work within a building, the Asbestos Management Team will notify all concerned parties about the proposed works as early as possible. Through discussion with the Asbestos Management Team, it is hoped that unimpeded access can be gained to all affected areas and that the normal day-to-day operations aren't affected.

## 7. Asbestos Planned Work Notification to HSE (14 days notice)

- Prior to carrying out licensed asbestos removal, a two week notification will need to be given to the HSE, notifying them of the intended works. As part of their notification, a '**Plan Of Work**' will need to be created, thoroughly referencing all aspects of the exercise, from project implementation, through to completion.

## 8. Fixings on asbestos containing materials

- No blu-tack, tape, drawing pins etc. should be used on any surfaces known or suspected to contain asbestos – these can include; textured coatings (artex); cement panels; insulating board panels (ie. access panels to risers) and others. Attaching and removing tape, tack or pins can disturb any asbestos which may be present either within or below the surface.
- All suspected or known ACMs should be present on the Asbestos Register, controlled by the Asbestos Management Team. If in doubt about a material that may contain asbestos, please contact them.

## 9. Estates Emergency procedures

- Once notified of any damage to a known or suspected asbestos containing material, FD Estates Helpdesk will contact the Asbestos Management Team. A check of the area will be undertaken, including reference to the Asbestos Register to ascertain whether known ACMs are present. Samples may be taken away for analysis to determine the presence of asbestos.
- FD Estates have developed an emergency procedure for unexpected release of asbestos fibres. If this procedure is required, then the Asbestos Management Team will put it into place immediately to ensure that staff and students are protected from harm. This may involve repairing or removing the asbestos-containing material. If this is the case FD Estates will take control of the area and manage all elements of repair or removal. In all probability, access will be restricted to this area until FD Estates or their appointed contractors have finished their work. Any concerns raised following the suspected damage of an ACM can be answered by the Asbestos Management Team.

## 10. Air monitoring and certificates of reoccupation

- There is a requirement to ensure that all staff, students and visitors are not exposed to asbestos fibres whilst removal works are carried out. The University employs a specialist UKAS accredited consultancy to carry out air monitoring during most aspects of asbestos removal. Any documented air tests are held by the Asbestos Management Team.

- Following Licensed asbestos removal works, and before the area can be re-occupied by staff / students, a certificate of re-occupation will need to be provided by the approved asbestos consultancy. This will follow a thorough visual inspection of the area in question, along with appropriate air testing. This documentation will be held on-file and can be provided, when needed.
- There may be reason to relax the need for air testing, when Non-Licensed asbestos removal is carried out. This is due to the relative safe nature of work and mitigated risks involved. This relaxation of air testing will be decided upon by the Asbestos Management Team.

#### **11. Providing information to the emergency services**

- Should Emergency Services require asbestos information, appropriately trained staff are able to provide this. Provision has been made for this both in and outside of normal working hours via the Asbestos Team and Security Services.

#### **12. Disposal or removal of asbestos waste**

- FD Estates manage and monitor the disposal of asbestos-containing materials, (including receipt and record of consignment notes) in accordance with the Asbestos Management Plan.
- Where equipment has been checked by the Asbestos Management Team and is known to contain asbestos, FD Estates will manage the removal of the asbestos. There may be instances that the equipment has to be taken whole, as the asbestos element cannot be fully removed. Any request for the removal of such asbestos / equipment should be sent to the FD Estates Helpdesk.
- FD Estates keep records of all consignment notes in their files, in line with University record retention requirements and the Asbestos Management Plan.

#### **13. Training**

- Further information on training is available in the Training Matrix, attached to this protocol.

#### **14. Access to the Asbestos register.**

- The Asbestos Management Team can also authorise nominated staff to have access to the Asbestos Register and be able to share relevant information with others. These extra authorised nominated staff would often be the local Health and Safety Managers. There are different levels of authorisation for use and distribution of this information – e.g. for information only, or for interpretation to assess the type of information on the system for passing onto contractors - and this is based on competency as set out in the Training Matrix attached to this protocol.

#### **15. Undertaking work likely to disturb the fabric of the estate, building or service area**

- If you or any colleague plans to undertake any work likely to disturb the fabric of the estate, building or service area you need to get authorisation by using the 'Contractors Appendix 1B' form. This can be accessed through the Health and Safety Services website - <http://wsh.leeds.ac.uk/info/209/forms/132/forms> .
- Any asbestos that affects the work will be highlighted prior to authorisation

#### **16. Equipment which may contain asbestos**

- A small number of pieces of equipment at the University may contain asbestos – e.g. fume cupboards, gaskets on ovens, heat pads to benches, kilns etc.
- If staff think they may have equipment containing asbestos, they should call the Asbestos Management Team. A check will be carried out on whether the equipment does contain asbestos and if so, they will add it to the Asbestos register.

## **17. Disposal of Equipment containing asbestos**

- If the equipment needs to be disposed of, your staff should contact the Asbestos Management Team who will arrange for disposal as described above in point 12 – Disposal or removal of asbestos waste.

## **18. Health surveillance**

- In the main, only Licensed Asbestos Removal Contractors carry out work with asbestos that requires health surveillance. They therefore manage their own health surveillance.
- Where identified in either the risk assessment or Asbestos Management Plan as requiring health surveillance, staff should be referred to the Occupational Health Service.

## **19. Inadvertent damage to building fabric, services, or equipment suspected to contain asbestos**

It is extremely important that all staff are aware of the following:

- If any damage occurs to the fabric of the building, or services suspected to contain asbestos are damaged then the FD Estates Helpdesk should be contacted (ext. 35555)
- Further information on the presence of asbestos can be obtained from the Asbestos Team or your Health and Safety Manager.
- Please note – no drilling or fixing to the fabric of the building can take place without approval from FD Estates. Authorisation will need to be given through application and this can be done via ‘Contractors Appendix 1B’ form; this can be accessed through the Health and Safety Services website - <http://wsh.leeds.ac.uk/info/209/forms/132/forms>

## **20. Incident of exposure reporting and investigation**

- If an incident of exposure to asbestos is thought to have occurred (ie. if a release of asbestos fibres is suspected), staff should immediately call either the Asbestos Management Team or Health and Safety Services - or the FD Estates Helpdesk (35555), or if ‘out of normal office hours’, the Security Services (x32222).
- The incident should then be reported as soon as possible using the University’s online accident and incident reporting system, Sentinel, following local processes.
- This is in addition to notifying FD Estates Helpdesk of any inadvertent damage to fabric of the building (see point 19 above).
- FD Estates will carry out an investigation into the incident, adopting the procedures that they feel are necessary in order to fully reassure everyone that it has been dealt with in the appropriate manner. This could include: a decision that there is no asbestos present and therefore no risk, full isolation of the area until work can be undertaken to make it safe, referral of people for medical advice, and/ or a report being made to the Health and Safety Executive (this is not an exhaustive list).
- FD Estates attach the findings of their investigation to the Sentinel entry (along with any completed Inadvertent Exposure Forms and a note of the advice given to staff and non-staff alike). The Asbestos Responsible Person discusses this with the Head of Health and Safety who ensures that this record is kept for 40 years

## **21. Exposure within RIDDOR Guidelines**

- Where the investigation deems that the incident of exposure falls within RIDDOR Guidelines – i.e. when a work activity has caused the accidental release or escape of asbestos fibres into the air in a quantity sufficient to cause damage to the health of any person - then:
  - the Health and Safety Manager in conjunction with the Head of Health and Safety makes the notification to the Health and Safety Executive (HSE),

- Affected staff are referred to Occupational Health,
  - Affected students, visitors and contractors are advised to visit their own GP so that the exposure can be recorded on their medical records.
- It is worth noting that any person with concerns that they may have been exposed to asbestos is advised to visit their GP, and inform them about the suspected exposure so that their health records can be updated.

## **22. Variation to the Standard**

- In very occasional circumstances a variation to the Standard may be required. If this is the case, it must be agreed in writing (and include a written procedure) between the Director of Estates and the Head of Health and Safety. They will take into account advice from the Asbestos Responsible Person.

For more support and advice speak to FD Estates Helpdesk. This guidance document is part of a broad Protocol on Asbestos, for more information go to [www.leeds.ac.uk/safety](http://www.leeds.ac.uk/safety)

### **Roles and actions**

In this protocol, and in-line with the University Asbestos Management Plan, the following actions are proposed for the role-holders listed:

<b>University Executive Group (UEG)</b>	<ul style="list-style-type: none"> <li>● Appoint the 'Duty Holder'.</li> <li>● Ensure that appropriate structures, systems and procedures are in place to secure effective implementation of the AMP.</li> </ul>
<b>Duty Holder</b> (Director of Campus Development)	<ul style="list-style-type: none"> <li>● Provide a suitable and sufficient allocation of resources to enable the effective implementation of the AMP.</li> <li>● Demonstrate an appropriate level of commitment to the effective management of asbestos within all University sites.</li> <li>● Ensure that resources are in place to enable a system of effective management and control of ACMs and presumed ACMs.</li> <li>● Provide resources to ensure that the AMP remains appropriate, fit for purpose and complies with legislative requirements.</li> <li>● To ensure the resources for appropriate training to members of the University who have significant responsibilities in the management of asbestos.</li> </ul>
<b>Heads of School/ Service</b>	<ul style="list-style-type: none"> <li>● Ensure that the requirements of the AMP are adhered to and communicated to their staff.</li> <li>● Satisfy themselves that effective systems and procedures are in place; ensuring that, within their area of responsibility, no building work is undertaken on the building fabric or services without authorisation from Estates.</li> <li>● Ensure that no work is undertaken by their School or Service which affects the building fabric or service, without written authorisation from Estates.</li> <li>● Facilitate, where required, access into areas under their control in order to undertake surveys or re-inspections.</li> <li>● Ensure that staff know what to do if damage occurs to the fabric of the building (or services) suspected to contain asbestos.</li> </ul>

<b>Staff and students</b>	<ul style="list-style-type: none"> <li>• Report to the <a href="#">FD Estates Helpdesk</a> ( 0113 343 5555) any damage to the fabric of a University building.</li> <li>• Ensure that any fixings (blutack, drawing pins, tape etc) are <b><u>not</u></b> put on surfaces without first seeking the asbestos management information for the room in question.</li> </ul>
<b>Director of Estates</b>	<ul style="list-style-type: none"> <li>• Responsibility for the day to day management of ACMs on University premises for which the University has landlord responsibilities.</li> <li>• Ensure that Asbestos Responsible Persons (ARP) and any supporting technical officers have sufficient resources, skills, training and authority to effectively manage identified and presumed ACMs.</li> <li>• Ensure resources to enable the implementation and review of the AMP, including cost review of large scale projects impacted by the presence of asbestos.</li> <li>• Ensure adequate resources are in place and that there are competent staff in place to implement the AMP across Estates.</li> </ul>
<b>Asbestos Management Team</b>	<ul style="list-style-type: none"> <li>• Provide guidance and recommended best practice in all asbestos related queries.</li> <li>• Promote a 'best practice' attitude concerning all work and activities that may be impacted upon by asbestos.</li> <li>• Ensure that the University policy / statement of intent, as referenced in the AMP, is being adhered to.</li> </ul>
<b>Asbestos Responsible Person / Asbestos Officer</b>	<ul style="list-style-type: none"> <li>• Responsible for the provision of information regarding the location and condition of ACMs throughout UoL premises.</li> <li>• Ensure that the identification and management of ACMs is carried out to enable UoL to meet their requirements under the AMP</li> <li>• Ensure that UoL is compliant with Control of Asbestos Regulations 2012 (CAR) Regulation 4</li> <li>• Develop the AMP, including liaising with the FD Health &amp; Safety Manager in order to conduct a yearly critical review of the AMP (unless changes in circumstances warrant a review prior to 12 months).</li> <li>• Review existing information, surveys &amp; registers prior to any works that may have the potential to bring people into contact with ACMs. If existing information does not adequately cover the scope of works, arrange to have the necessary survey carried out that would cover any works scheduled to take place. This should be highlighted during the design &amp; implementation phase, so as not to cause any unnecessary delays due to the notification and nature of asbestos removals.</li> <li>• Deal with the appointment of competent persons, consultants &amp; contractors to undertake surveying &amp; analytical works.</li> <li>• Appoint Licensed Asbestos Removal Contractors (LARCs) to undertake the removal of asbestos containing materials, ensuring that all pertinent information is checked and verified prior to commencement of works.</li> <li>• Organising, where appropriate, pre-start meetings to agree the plan of works.</li> <li>• Report on the performance and competence of appointed LARCs and consultants, bringing any shortfalls to the attention of the Duty Holder.</li> <li>• Maintain and update the live electronic asbestos register.</li> </ul>
<b>Professional Services/</b>	<ul style="list-style-type: none"> <li>• Ensuring breaches of compliance with the AMP are fully investigated</li> </ul>



<b>FD Health and Safety team</b>	<p>and documented.</p> <ul style="list-style-type: none"> <li>• Liaise with an Asbestos Responsible Person to conduct a yearly critical review of the AMP.</li> <li>• To give consideration to the systems and procedures in place, ensuring that they best serve the University and the asbestos standard.</li> <li>• To support any investigation into potential exposure to asbestos.</li> </ul>
<b>FD Estates Helpdesk</b>	<ul style="list-style-type: none"> <li>• Contact the Asbestos Management Team if an inadvertent release of asbestos is reported.</li> <li>• Put staff in touch with the Asbestos Management Team if they have questions regarding asbestos.</li> </ul>
<b>Occupational Health Service</b>	<ul style="list-style-type: none"> <li>• Keep health records for 40 years of staff who have been subject to health surveillance for asbestos, or who have been referred to OHS after potential inadvertent exposure to asbestos.</li> <li>• Be involved in the process as necessary if there is a potential incident of exposure to asbestos.</li> </ul>
<b>Head of Health and Safety</b>	<ul style="list-style-type: none"> <li>• Co-ordinate with the Professional Services/ FD Health and Safety team, ensuring that any records of potential inadvertent exposure to asbestos are attached to Sentinel, flagged and kept for 40 years.</li> </ul>
<b>All staff</b>	<ul style="list-style-type: none"> <li>• Report any potential incident of inadvertent exposure to asbestos to the Asbestos Management Team.</li> <li>• Log the potential incident, using local processes and the University's online accident reporting system (Sentinel).</li> </ul>