

# Asbestos Management Plan



**This document provides formal Policy, Procedures and Guidance.  
Compliance ensures the College is a healthy and safe environment for all.  
The AMP is relevant to all who work, study or visit Imperial College campuses.**

Approved by:	Health, Safety and Environment Committee
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<b>CONTENTS</b>		<b>Page</b>
1	Introduction	3
2	Policy	4
3	Organisation and Responsibilities	5
4	Procedures	14
Appendices		
1	Key Contacts	15
2	Enquiries	16
3	Identification of ACMs	17
4	Asbestos Register	19
5	Risk Assessment of ACMs	20
6	Management of ACMs	21
7	Project Management Procedures for all Building Works	25
8	Specialist Contractors	28
9	Emergency Procedures	29
10	Information and Training	32
11	Action Plan	35
12	Review of the AMP	36
13	Key Regulatory Documents	37

## 1 INTRODUCTION

This Asbestos Management Plan (AMP or Plan) describes how Imperial College manages the risks from asbestos containing materials (ACMs). It sets out College policy and procedures and is designed to effectively manage and minimise asbestos-related health risks to personnel working at Imperial College or occupying its premises.

This policy is relevant for and applies to all at Imperial College – Academic and Support Departments, staff, students – and its visitors and contractors.

### 1.1 Presence of asbestos – buildings, plant and equipment

Asbestos was used in the UK up to 2000 in the construction and manufacturing industries. Any building along with its associated plant, constructed or refurbished prior to this year, may contain asbestos in one or other of its many different forms.

In addition, some equipment (including that used in teaching and research), constructed in the UK prior to this date, may contain asbestos. Asbestos continues to be used in construction and as components within equipment in many other countries, although the EU and Turkey banned it from January 2005.

It is important to note that Imperial College manages many but not all of the buildings used by its staff and students. Those buildings managed by other institutions (such as NHS Trusts), have their own asbestos management arrangements. If you wish to know about these, you will need to contact your Building Manager. Reciprocal reporting arrangements are in place between the College and all such institutions.

The presence of an ACM does not in itself constitute a danger. However, the ACM may become hazardous when disturbed or damaged and must be treated accordingly. Activities which give rise to airborne dust, e.g. breaking, sawing, cutting, drilling etc. are most likely to present risks.

### 1.2 The Asbestos Register

Surveys for ACMs have been carried out at Imperial College managed campuses. A major project undertaken in 1994 surveyed the bulk of the College Estate (buildings and associated plant); this information forms the basis of the current Register. Further surveys have been carried out related to specific projects or investigations. **Where a survey has not been carried out ACMs are to be presumed present unless known otherwise.**

Some items of equipment have been included in the Register, but only if they have been notified to the Asbestos Manager (usually via the EO Customer Services Centre). Please see relevant Appendix (App 3) for further information on how to get equipment identified and access to the Register (App 4)

### 1.3 Risks to College

The aim of the Asbestos Management Plan is to protect the College and its members from the risk of exposure to asbestos.

At College level there are four main risks to the effective management of asbestos:

- Failure or inadequate Asbestos Management Plan (AMP) which might result in exposure or prosecution.
- Loss of competency in asbestos management
- Loss of the Asbestos Register
- Insufficient resource (funding)

In addition there are specific risks relating to the activities of Campus Services:

- Risk of College Estates Operations staff and contractors disturbing ACMs – particularly unlabelled, concealed or hidden materials
- Risk of exposure to asbestos in premises not controlled by the College (e.g. hospitals, site partners, external accommodation providers).

There are also specific risks associated with research and teaching:

- Accidentally disturbing or damaging superficial or hidden asbestos in College property or on sites not owned or controlled by the College (including while working abroad);
- Risk of exposure from equipment containing asbestos

### 2 POLICY

#### 2.1 College Policy

It is College Policy to:

- prevent exposure to the hazards associated with asbestos
- promote awareness of the Asbestos Management Plan (AMP) and the hazards of asbestos, through training and induction of staff and those working on behalf of the College
- hold regular meetings with key groups to increase awareness of asbestos issues
- provide and maintain an Asbestos Register
- provide information and advice on asbestos issues
- develop, implement and review an effective management strategy so that appropriate measures, such as sealing, labelling, inspection or removal of ACMs are undertaken
- regularly review the AMP

The Plan complies with the Health and Safety at Work etc. Act 1974 and the Control of Asbestos Regulations 2012. The Plan, Policy and Procedures apply to all parts of the College without exception. The Principles of the Plan also apply to all those workplaces used by College staff.

#### 2.2 Asbestos Management Plan

The Plan sets out the mechanism by which ACMs are managed. It includes details on how the College intends to:

- Protect those working on the fabric of Imperial College
- Protect those working within or occupying Imperial College
- Effectively control any works likely to affect ACMs
- Identify and categorise ACMs and manage those hazards based on prioritisation and assessment of the risk that they present
- Produce a prioritised programme for the remediation of ACMs that, because of their location and/or condition, present an actual or perceived risk to health
- Monitor and maintain the condition of identified ACMs that are assessed as being able to be left in-situ.

## 3 ORGANISATION AND RESPONSIBILITIES

### 3.1 Definition and responsibilities of the “Duty Holder”

The Duty Holder is the person or organisation that has clear responsibility for the maintenance or repair of non-domestic premises including through an explicit agreement such as a tenancy agreement or contract. At Imperial College, **for buildings controlled by Estates Operations, the Duty Holder is the Director of Estates Operations.**

There is a significant premises portfolio fully or mainly **controlled by the Investment Portfolio Office**. The Investment Portfolio Office is a portfolio of non-core premises, actively managed to enhance the College finances. If maintenance and repair for these premises has been contracted out, or is managed through an Agent, the Duty Holder is the Investment Portfolio Office. Unless explicitly stated all Investment Portfolio Office premises will be managed as described within this AMP.

Sometimes there **is no tenancy agreement or contract**, or these may not specify who has responsibility for maintenance or repair. In these cases, or where the premises are **unoccupied**, the duty is placed on whoever has control of the premises, or part of the premises. This may be the owner or their Agent. Where **an Agent is the Duty Holder**, the College Asbestos Register and its upkeep remains the responsibility of the College (see Appendix 4: Asbestos Register).

Any Agent employed by the College, who is a Duty Holder, is required to have in place an asbestos management system that parallels or exceeds the requirements of the ICL AMP. If the ICL AMP is not directly adopted they must provide details of the alternative system in use, and send this to the College Asbestos Manager for review; in addition any asbestos removal should be undertaken by one or other of the College’s “Preferred Contractors”.

### 3.2 Responsibilities

3.2.1 The **Director of Estates Operations** is the College designated '**Duty Holder**' in respect of the Control of Asbestos Regulations 2012, and will ensure that:

#### Resources

- A competent person(s) or organisation is appointed to provide technical and professional support and advice.
- Sufficient funding is made available to discharge the responsibilities the College has under the Regulations and to systematically remove, remediate or monitor asbestos containing materials from the structure and fabric of the estate.

#### Organisational Arrangements

- A Plan, the Asbestos Management Plan (AMP) is produced setting out the measures and arrangements the College has in place to discharge its duties under the Control of Asbestos Regulations 2012.
- All buildings, **managed by ICL**, and habited by staff, students or tenants have been surveyed for the presence of asbestos and an Asbestos Register produced identifying, so far as reasonably practicable, the locations of ACMS and their risk status.
- Roles and Responsibilities for Key Officers and Managers are set out in the AMP
- All persons having a defined role within the AMP or having responsibility for assisting the College to discharge its duties received appropriate training and instruction.
- That clear procedures and protocols are in place to support the College in discharging its duties.
- That breaches of its duties or written procedures are fully investigated and action taken to review procedures to prevent a recurrence.

#### Audit and Review

- The AMP will be periodically audited to ensure it is fully implemented and functioning effectively.
- Active monitoring of procedures and protocols will be undertaken as prescribed in the AMP.
- An annual Review of performance will be undertaken and a report provided for the 'duty holder' and Health & Safety Management Committee.
- The AMP will be reviewed annually to ensure it tracks any legislative or organisational changes and remains fit-for-purpose.

#### Licensed Contractors

- The appointed 'Competent Person' will ensure a body of Licensed Asbestos Removal Contractors are available to the College.
- The performance of the Licensed Contractor(s) is regularly monitored to ensure they comply with legislative requirements and College policy.

#### Tenants and Partners

- There is liaison with the Asbestos Management service providers of other institutions whose buildings are habitually occupied by members of the College (e.g. Site Partners, NHS Trusts, and external accommodation providers) when assurance on their asbestos management systems – such as emergency procedures – or detailed information such as consulting their Asbestos Registers is required.

#### 3.2.2 The **Head of Fire & Safety, Estates Operations** is responsible for ensuring:

- Information on ACMs being appropriately stored and made available to all interested parties including Trade Unions.
- Appropriate records of asbestos works are generated and retained.
- The Asbestos Register is maintained and regular audits of the Asbestos Register are undertaken.
- Following risk assessment ACMs are assigned appropriate management options and priority actions are timetabled.
- Arrangements are made so that College employees have the necessary facilities, training and allied competencies to discharge the duties assigned to them under the Plan.
- Arrangements are made so that all relevant personnel and organisations receive appropriate information, instruction and training related to ACMs and the existence and use of the College Asbestos Register.
- Regular meetings are held with relevant parties, e.g. the programmed Asbestos Progress Meetings, Trade Union Liaison Meetings etc.
- The performance of the Plan is annually reviewed and amended as necessary.
- An annual report on the Plan and related issues is submitted to the Director of Estates Operations.
- Emergency procedures are established and reviewed regularly and in the event of any relevant incident.
- A list of Licensed Asbestos Removal Contractors and Analytical Companies approved for use on Imperial College sites is maintained and monitored.

#### 3.2.3 The **Chief Information Officer of Information, Communications and Technology (ICT)** is responsible for ensuring that:

- Service routes are assessed for ACMs at feasibility stage of an ICT project.
- Proposed works are discussed with the ICL Asbestos Manager.
- All relevant ICL staff are fully briefed in respect of the AMP and their duties as specified in the Plan.
- All ICT staff have received the appropriate training, including refresher training, which will enable them to discharge their duties in compliance with the AMP.
- That relevant ICL staff are aware of the Asbestos Register and the routes by which asbestos information can be obtained.
- All contractors appointed by or managed by the Head of ICT have been fully briefed and inducted in respect of the AMP and are discharging the responsibilities assigned to them within the Plan.

#### 3.2.4 The **Director of Campus Services** is responsible for:

- Ensuring that Information and awareness of the risks from asbestos is given to all students (whether or not they are in Halls of Residence or private accommodation).
- If in ICL Halls of Residence the information will be distributed to Students in our welcome communication materials.
- Responding to any concerns arising from asbestos via the Student body.
- Conducting routine audits of the asbestos management system of external Halls providers.
- Their Project Managers are aware of the Plan and have the necessary skills to implement their responsibilities under the Plan.
- The necessary requirements for the safe management of ACMs are fully identified and incorporated into any design or specification

#### 3.2.5 The **College Safety Director** is responsible for:

- Where reporting is not a requirement of a Main Contractor or similar, reporting incidents where exposure limits exceed those laid down in the Control of Asbestos Regulations, to the Health and Safety Executive under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR,) and collating Dangerous Occurrence Forms.
- Providing health and safety advice to members of the College.
- Reviewing with the Asbestos Manager relevant regulatory requirements and best practice.
- Working with the Director of Occupational Health to investigate and assess exposure following serious asbestos incidents.

#### 3.2.6 The **Director of Occupational Health** is responsible for:

- Reviewing exposure assessments provided by the Asbestos Manager.
- Making a further assessment of health risk.
- Offering to discuss any concerns with members of the College who may have been exposed.
- Retaining a health record for the individual for the statutory period (40 years).
- Contacting the exposed person(s) GP in the event of the control limits being exceeded.

#### 3.2.7 The **Head of Maintenance** is responsible for ensuring that:

- All Maintenance Staff are fully briefed in respect of the AMP and their duties as specified in the Plan.
- All Maintenance Staff have received the appropriate training, including refresher training, which will enable them to discharge their duties in compliance with the AMP.
- Locations under the control of Maintenance e.g. plant rooms, roofs, tunnels and risers, have been surveyed for the presence of asbestos and where appropriate ACMs have been removed, treated or have warning signage.
- All contractors appointed by or managed by the Head of Maintenance have been fully briefed and inducted in respect of the AMP and are discharging the responsibilities assigned to them within the Plan.
- All staff and contractors are provided with appropriate access to the data contained within the Asbestos Register.

#### 3.2.8 **Project Managers and Principal Designers:** For the purpose of this document a project manager is defined as any person co-ordinating works. The Project Manager is responsible for ensuring that:

- Areas, **including known and potential services routes** are assessed for ACMs at the feasibility stage of a project. Guidance on the assessment required is given in Appendix 7.
- All appropriate actions within the AMP are implemented.
- Project changes are promptly reviewed with respect to asbestos information, for example where extension of project area, or changes to M&E installations occur. Actual reviews may fall within the remit of other project team members, including those with responsibilities under the Construction (Design and Management) Regulations 2015.
- Any necessary works use the management service provided by Asbestos Manager or are managed to at least the same level as set out in 3.3.13
- The [Building Manager](#) is informed of all relevant project information.
- All project personnel are informed of the location of any known ACMs affecting the project.
- Works are halted if suspect ACMs are discovered during the course of work and further advice is sought from the Asbestos Manager.
- All Project management personnel are fully aware of emergency procedures in the event of an asbestos-related incident.
- Health and safety (asbestos) aspects of the project are monitored – with relevant persons informed of potential or actual asbestos problems.
- Prior to asbestos surveys, arranging for decontamination and sign-off of areas where hazardous or radioactive substances have been present or are suspected, in accordance with the College Code of Practice for Access Control.



#### 3.2.9 **Building Managers**, in addition to any Project Management role they may have, are responsible for:

- Collating and forwarding as appropriate any relevant information given to them by Project Managers.
- Knowing whether or not and where identified asbestos is located in the buildings they manage in order to monitor its condition (in addition to annual checks conducted by the Asbestos Manager).
- Providing information from the Asbestos Register and on asbestos to relevant persons when requested.
- Being very familiar with, participating in and helping to co-ordinate asbestos emergency procedures.
- Liaising with Site Partner asbestos management service providers as and when necessary, particularly with respect to emergency arrangements and procedures.

#### 3.2.10 **Contractors** are responsible for:

- Ensuring that they respond to, and maintain, all communications with their Project Manager.
- Compliance with the AMP and relevant procedures, and where acting as sole, main or principal contractor to have a thorough understanding of these procedures.
- Ensuring that all sub-contractors are informed of the AMP and relevant procedures and are aware of the location of ACMs within the project area.
- Co-operating with any Licensed Asbestos Removal Contractors or associated contractors working within or adjacent the known or intended project area.
- Ensuring that emergency measures are in place for any suspected or known exposure to ACMs and that these are in line with Imperial College procedures.

#### 3.2.11 **Deans of Faculty and Heads of Departments and Institutes** are responsible for:

- Understanding the asbestos-related risks in their department (including where identified accessible, easily damaged asbestos is located) or arising from departmental activities.
- Ensuring vulnerable asbestos items are inspected routinely by the DSO (as well as during re-inspections undertaken by the College Asbestos Manager); and that such asbestos is removed as soon as possible.
- Ensuring all staff, students and visitors are aware of their individual responsibilities regarding this AMP including:
  - The meaning of the “a” for asbestos label and knowing what to do if they think they have found or disturbed asbestos.
  - Not to drill into walls (this may also damage hidden services and fire compartments).
  - Being aware that there is a risk of exposure from opening up equipment which is imported or predates the UK Asbestos (Prohibitions) (Amendment) Regulations 2003 and that they must check suspect equipment with the Asbestos Manager (via the EO Customer Services Centre).
  - Being aware that asbestos legislation does not apply in every country, therefore imported or inherited equipment may still be constructed with ACMs; it may also be used in building construction, and demolition processes may not be sufficiently stringent to prevent exposure.
  - Seeking up to date information from the Asbestos Manager, particularly if visiting construction and demolition sites abroad.
- Clearly identifying, recording and managing (including checking for deterioration) all departmental equipment, materials and apparatus containing ACMs, and contacting the EO Customer Services Centre to record continuing use/arrange for labelling/disposal etc. as appropriate.
- Checking that new equipment or apparatus erected, installed, purchased or gifted on behalf of the department is free of asbestos material. (See Appendix 3: Identification of ACMs – ACMs in Equipment).
- Implementing any measures deemed necessary by the Asbestos Manager.
- Prior to asbestos surveys, arranging for decontamination and sign-off of areas where hazardous or radioactive substances have been present or are suspected, in accordance with the College Code of Practice for Access Control.
- Informing all those who have the potential to undertake building related works that appropriate ICL procedures – for example Building Manager involvement – should be implemented.

#### 3.2.12 Staff are responsible for:

- Immediately reporting to the [Building Manager](#) and/or EO Customer Services Centre, any known ACMs – in the building, plant or equipment - which are damaged or disturbed or any suspect ACMs of any condition and any defects or concerns they may have related to asbestos issues or remedial works.
- Contacting their [Building Manager](#), or Project Manager where already appointed, regarding any work to be undertaken which may involve ACMs.
- Undertaking Month One Safety Training and the associated test or attending departmental student induction training (as these cover basic Asbestos awareness).
- Attending the College Asbestos Awareness training course when so requested.
- Not drilling into or otherwise interfering with surface finishes or walls (this may also damage hidden services and fire compartments).
- Understanding the risk of exposure from opening up equipment which is imported or predates the UK Asbestos (Prohibitions) (Amendment) Regulations 2003 and that they must check suspect equipment with the Asbestos Manager first, (via the EO Customer Services Centre).
- Recognising that asbestos legislation does not apply in every country, therefore imported or inherited equipment may still be constructed with ACMs; it may also be used in building construction, and demolition processes may not be sufficiently stringent to prevent exposure.
- Seeking up to date information from the Asbestos Manager on suspect equipment or when visiting construction and demolition sites abroad.

#### 3.2.13 Students are responsible for:

- Immediately reporting to the [Building Manager](#) and/or EO Customer Services Centre, any known ACMs – in the building, plant or equipment - which are damaged or disturbed or any suspect ACMs of any condition and any defects or concerns they may have related to asbestos issues or remedial works.
- Undertaking Month One Safety Training and the associated test or attending departmental student induction training (as these cover basic Asbestos awareness).
- Attending the College Asbestos Awareness training course when so requested.
- Understanding the risk of exposure from opening up equipment which is imported or predates the UK Asbestos (Prohibitions) (Amendment) Regulations 2003 and that they must check suspect equipment with the Asbestos Manager first, (via the EO Customer Services Centre).
- Recognising that asbestos legislation does not apply in every country.
- Seeking up to date information from the Asbestos Manager on suspect equipment or when visiting construction and demolition sites abroad.

**3.2.13 The Asbestos Manager is responsible for:**

Undertaking a range of tasks either on behalf of Estates Operations or, when specifically instructed, for a Project Manager. These tasks are:

For Project Managers, under their specific instruction:		
	For Estates Operations:	
<b>General ACM Management</b>		
Carrying out appropriate level of investigation or similar in response to an enquiry or identification of previously unknown asbestos item and if required providing a documented report	*	*
Identifying ACMs as required, undertaking formal risk assessment and updating the Asbestos Register	*	*
Ensuring that, where ACMs are removed, or remain in-situ under a monitoring regime the Asbestos Register is updated	*	*
Organising a regular audit of the Asbestos Register	*	
Assessing, reviewing and recommending management actions in light of inspection findings and changes in Regulations or current good practice	*	
Reviewing and amending where necessary standards of works detailed in the College general specification for works with ACMs	*	
Organising and undertaking a regular inspection of ACMs	*	
Recommending and specifying programmes of work for asbestos management specific projects	*	
Reporting incidents to the College Safety Director and Head of Health & Safety, Estates Operations, and completing Dangerous Occurrences forms as necessary	*	*
Producing a written assessment of reported exposures to include:	*	*
– Names of individuals potentially exposed and the estimated exposure times.		
– Type(s) of asbestos present.		
– Levels of airborne fibre.		
If the control limits specified in the Control of Asbestos Regulations have been exceeded, forwarding the assessment to the College Safety Director, the Director of Occupational Health and the Director of Estates Operations.		
Ensuring there are appropriate <i>site-wide</i> emergency procedures in place (e.g. if other employers occupy our buildings) and reviewing these annually, and after an incident.	*	
<b>Management of remedial works</b>		
Preparing a specification for asbestos remedial works and issuing to the Project Manager	*	*
Recommending appropriate Asbestos Contractors and Analysts from a pre-assessed List	*	*
Assessing Asbestos Contractor's Plan of Works and recommending selection where applicable	*	*
Informing the Project Manager of asbestos remedial works implications		*
Assessing the appropriate level of analytical support and attendance	*	*
Informing appropriate staff of asbestos related works in good time via the Project Notification system	*	*
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 Asbestos Manager, Contractor and Analyst		*
Reviewing method statement amendments with Contractor's Site Supervisor and Senior Manager.	*	*
Ensuring site works comply with relevant College requirements	*	*
Monitoring Asbestos Contractors via the RAG system to assess their compliance with statutory and College requirements, reporting and discussing deficiencies with the Head of Health & Safety, Estates Operations. The frequency of site method statement changes to be included in these reviews	*	*
Stopping work where an Asbestos Contractor does not perform to the required health and safety standards, or where his actions appear likely to result in a breach of H&S or College standards	*	*
Assessing, directing and assisting in access requirements as required, related to relevant air monitoring strategies	*	*
For Project Managers, under their specific instruction:		
	For Estates Operations:	

<b>General and financial administration tasks</b>			
Providing cost estimates for asbestos works			*
Tendering the asbestos works in accordance with College Contracts Policy and Procedures		*	*
Preparing order information		*	*
Assessing invoices prior to authorisation by the Project Manager		*	*
<b>Information, liaison and education:</b>			
Reviewing with the College Safety Director and Head of Health & Safety, Estates Operations proposed regulatory changes and current standards of good practice.		*	
Providing expert advice on ACMs and their treatment to those with responsibility under this AMP		*	
Participating in the organisation and delivery of asbestos awareness seminars		*	*
Attending Progress Meetings		*	*
Maintaining regular dialogue with the Head of Health & Safety, Estates Operations, including reports on visits and actions by the HSE, local authority environmental health and similar bodies		*	
Providing the HSE and similar bodies with details of asbestos management procedures and projects where relevant in accordance with instructions from the Director of Estates Operations. Details to be provided prior to project start, or on completion, as relevant.		*	
Providing specialist reports on budget, materials status, etc. as required, including an annual report to the Director of Estates Operations.		*	
<b>Record keeping:</b>			
Updating the Asbestos Register		*	*
Updating the relevant Asbestos Drawings and making available on the appropriate College document sharing platform.		*	*
Ensuring that all statutory documents generated by the works are properly completed and a record kept		*	*
Keeping detailed project records relating to asbestos remedial or investigative works			*
Providing the Project Manager with an Asbestos Works Completion statement when appropriate			*

#### 3.2.14 Asbestos Contractors are responsible for:

- Complying with current legislation, associated Approved Codes of Practice and Guidance and the Imperial College AMP and Project Procedures
- Attending site to assess and prepare quotations against asbestos remedial works specifications, the Contractor to raise any issues relating to the health and safety aspects or potential costs of a project
- Providing a Plan of Work to the Project Manager and the Statutory Authority. This to include details of project resources and timetable and an emergency procedure discussed and agreed with the Project Manager
- Providing Statutory Notice to the Statutory Authority prior to commencing asbestos works, or, by agreement and at the request of the Project Manager, applying for a waiver from the minimum notice
- Attending the asbestos contract pre-Start meeting, Project Progress Meetings, and handover Meeting as required
- Carrying out regular inspections of the work environment, any defects found by or reported to the Project Manager or Analyst being rectified by the Contractor immediately
- Complying with all reasonable requests from the Project Manager
- Complying with Permits to Work
- Complying with accident and incident investigations
- Liaising with the Analyst to ensure the satisfactory progress of the works
- Providing copies of notification and consignment notes and other relevant documentation with final account to the Project Manager
- Ensuring they, their staff and sub-contractors are competent in their allotted tasks, attend College Asbestos Awareness training and College asbestos toolbox talks if relevant.

#### 3.2.15 Analytical Consultancies are responsible for:

- Maintaining UKAS accreditation relevant to instructed tasks
- Providing pro-active support to the Project Manager, but to a level which would not fall within the HSE requirement for a supervisory License
- When requested by the Project Manager:
  - Reviewing and commenting on asbestos works specifications and, prior to start of the works, on the Contractors Plan of Work
  - Providing quotations which reflect the anticipated project site and analytical requirements
  - Attending meetings, including but not restricted to, Pre-start, Project Progress and Handover Meetings.
- Completing check lists, warning and advisory signs etc. as supplied by the Project Manager
- Assisting with the application and completion of College specified permits and warning signs etc, relevant to the asbestos remedial project, including hot works permits etc.
- Carrying out analytical works and inspections as agreed with the Project Manager. Where site conditions alter, and the Project Manager is not immediately available, the Analyst to adjust the level of testing and inspection to ensure that all information relevant to the continued health and safety of the Contractor and building occupants is obtained
- Reporting to the Project Manager any defects or non-compliances relating to the Contractors performance, including suitability of the work areas, adherence to the Plan of Work, Statutory Instruments and AMP. Where the Project Manager is not immediately available the Analyst to take any measures necessary to ensure the health and safety of the Contractor and building occupants
- Checking areas on completion of asbestos remedial works to ensure that the Contractor has completed his scope of works and all affected areas have been left in a satisfactory condition
- Maintaining regular contact, as minimum at start and at end of each site day, with the Project Manager, regarding progress of site works
- Reporting to the Project Manager any aspects of asbestos management encountered on site which could give rise to health risks
- Providing daily written reports on project progress to the Project Manager; the reports to include such information in excess of accreditation requirements as requested by the Project Manager
- Issuing formal Reports, including 4 Stage Clearance and Certificate of Re-Occupation, to the Project Manager on completion of site works.

### 4 ASBESTOS MANAGEMENT PROCEDURES

Procedures are detailed within the following Appendices.

Procedures are included within the formal Plan review and are amended as required.

## Management Contacts

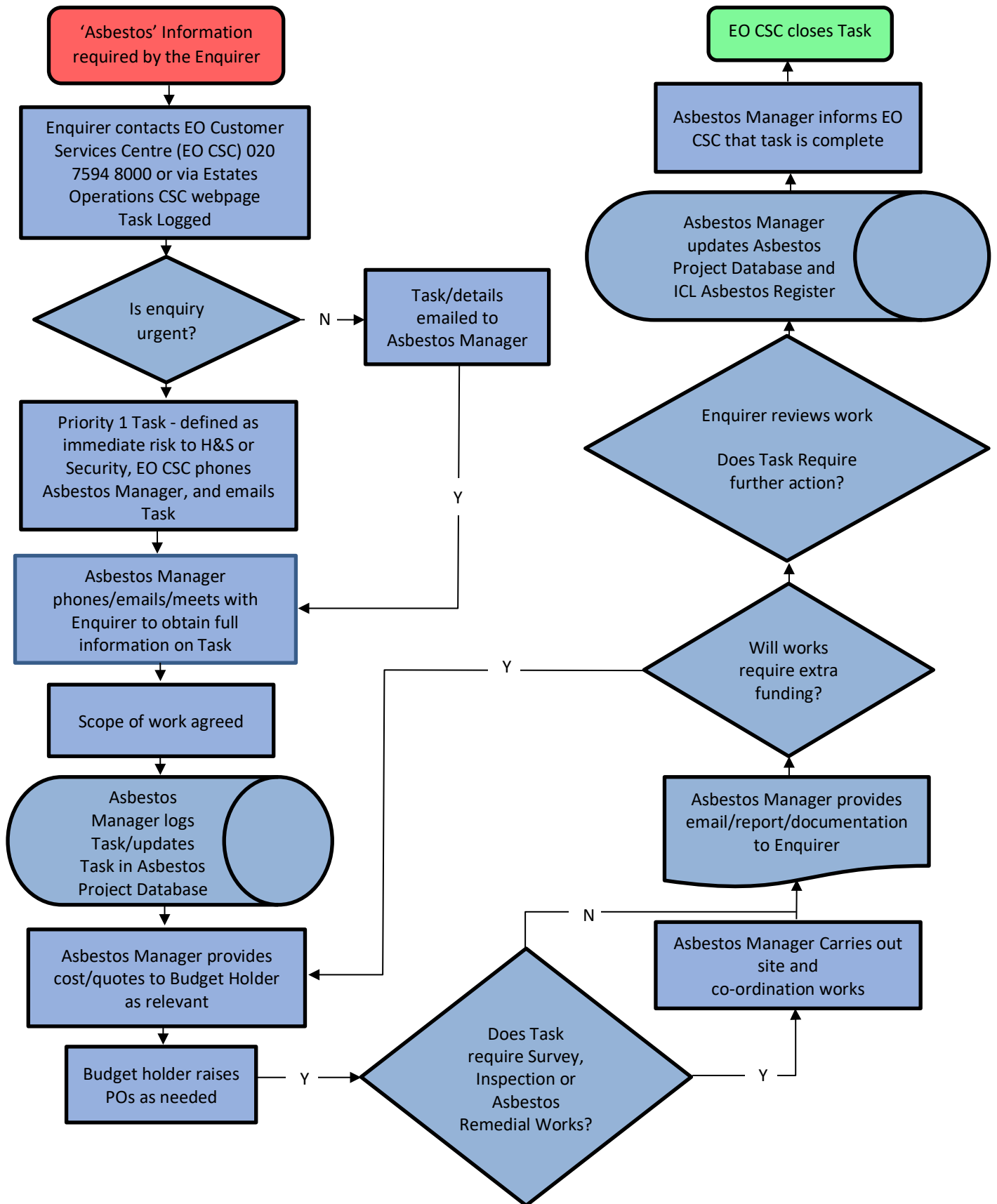
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### Appendix 1: Key Contacts

Information can be found within the Imperial College, London web site, <https://www.imperial.ac.uk/estates-facilities/about-us/contact-us/> or by contacting the main ICL Switchboard on 020 7589 5111.

Enquiries

Appendix 2: Flow chart showing enquiries route:





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**Identification of ACMs**

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**Appendix 3: Identification of ACMs****1 Historical Background**

College wide survey data from 1994 has been, and continues to be, supplemented with information gained during local detailed surveys and investigations.

**2 Surveys for ACMs**

Priority areas for survey are identified by the Asbestos Manager, generally in relation to planned maintenance tasks and refurbishment projects.

- Surveys and re-inspections are carried out to comply with HSE guidance, for example, document HSG 264 (Second Edition): The Survey Guide.
- An appropriately accredited Inspection Body carries out surveys with the works managed by the appropriate Project Manager.
- Survey types are detailed in HSG 264, a summary is given below

**3 Management Surveys**

Management surveys are intended to identify ACMs that could affect the normal occupation of a building. This includes ACMs that might be disturbed not only by regular maintenance activities, but also those affected by reasonably foreseeable activities such as cabling works in risers.

- The 2012 HSG 264 (Second Edition): The Survey Guide emphasises the benefit of thorough surveys, with attempts to be made to open up areas where maintenance or similar can be anticipated. Samples of suspect materials should be taken, although some level of ‘presumption’ and reduced sampling regimes are acceptable so long as the consequent management of identified or suspected ACMs is appropriate.
- ‘Management surveys’ fell under Type 1 and 2 survey descriptions in earlier HSE guidance (MDHS 100).
- The current knowledge of ICL ACMs is at a level comparable with this ‘Management Survey’ definition. However, the significant volume of survey work undertaken in the mid 1990s was generally to occupied buildings, so this occupation may have caused Surveyors access problems with related limitations to the survey findings.
- The HSE expects virtually all non-domestic premises to have Management Survey information already; this data is essential for the **Duty Holder** to effectively manage ACMs and thus comply with the ‘Duty to Manage’ requirement stated in Regulation 4 of the Control of Asbestos Regulations 2012.

## Identification of ACMs

### 4 Refurbishment surveys and demolition surveys

These surveys attempt to locate and describe all ACMs in a project area and are required well before any refurbishment or demolition is due. This type of survey is also required for what may appear, initially, as relatively minor work, for example, formation of a riser, or dismantling of heating plant. Prior to January 2010 these surveys were termed 'Type 3' in the HSE MDHS 100 guidance.

To enable this level of identification the area must be fully accessible to the surveyor and appropriate investigation techniques and equipment be employed. Survey planning is essential, to allow the Surveyor to understand the scope of the intended works, for any exclusions to the survey to be agreed with the Client, and for arrangements to be made to clear, such as decontamination from hazardous and radioactive substances if such contamination is likely, and isolation of services. HSG 264 emphasises the need for the survey area to be isolated from building occupants and that, ideally, reoccupation after survey is not planned. However it recognises that this is not always achievable. Where the survey area is to be reoccupied assurance that it is acceptable for reuse must be obtained from the Surveyor.

Intrusive investigation works can be significant – making good after survey works is minimal unless requested otherwise. Suspect materials are sampled during the survey, and the extent of ACMs estimated. The condition of the ACM is generally not reported except where materials are damaged, if areas of asbestos debris may be expected, or if there will be a time delay between the survey and the intended refurbishment or demolition.

For a refurbishment or demolition survey to be successfully completed at least the following criteria must be met:

- area is unoccupied, with no intention to reoccupy after survey
- area is fully accessible – with fixings, furnishings, and heavy equipment removed, or at least easily movable
- area is fully accessible in terms of decontamination sign-offs and other relevant authorisations
- suitable survey techniques are employed – breaking through of partitions, opening up of floor voids, use of access platforms for high level areas etc.

If the conditions above are not met the survey will not be considered comprehensive; limitations will be noted in the Survey Report and arrangements will need to be made to undertake further survey work when the site conditions area appropriate.

The HSE recognise that unidentified ACMs may still remain in the survey area, thus appropriate controls need to be in place for the actual refurbishment period, and most certainly for any demolition works.

### 5 ACMs in Equipment

ACMs have frequently been used in scientific and technical equipment. Asbestos fibres have a range of properties - insulating, non-electrical conductive, resistance to acid – which made them suitable for many uses including production of heat-proof mats, heat-resistant gloves, insulation within kilns and furnaces, hot-boxes, packing, panels to the sides and doors of flammable cabinets associated with fume cupboards, and electrical equipment. Asbestos may also be present in certain washers and gaskets.

It is the responsibility of the Head of Department to have asbestos containing departmental equipment, materials and apparatus clearly identified, appropriately recorded and managed. Items known to contain asbestos should be disposed of where possible, or if they are to be retained, be recorded on the Asbestos Register (via the EO Customer Services Centre), labelled with the "a" for asbestos warning symbol, and their condition monitored for deterioration.

Where it is unclear if asbestos is the material present, and a positive identification is required, this should be requested via the EO Customer Services Centre.

**Asbestos Register****Appendix 4: Asbestos Register****1 Contents of the Register**

The Register records known and suspected ACMs in Imperial College managed campuses and related locations. It contains information on their:

- location, extent, condition and labelling status

The Register is aligned with the recommendations of HSG 264, information recorded allows objective risk assessments to be carried out and provides some detail on:

- non ACMs where, in the normal course of the building operation, they may be confused with ACMs
- areas, where known, which have not been surveyed.

The presumption must be made that ACMs may be present in all un-surveyed areas this includes areas that may have been outside of the scope of the original 1994 survey inspection - unless subsequent investigation has been carried out.

**2 Drawings**

Drawings may be used to illustrate the Register information; these will be colour marked up and subject to update procedures. Drawings will supplement the formal issued Register and will provide the Location Reference used within the Register.

**3 Storage**

The Register is stored electronically and backed up onto College servers to ensure it is not lost.

The Asbestos Manager holds the current Register and archive Registers.

The working Register copy is held by the Asbestos Manager.

**4 Availability**

The Asbestos Register is available to all who may reasonably require such information.

- A version of the most recently issued Register is held on the Estates Operations College document sharing platform and is also available direct from the ICL Asbestos Manager.
- Other enquirers should go through the EO Customer Services Centre or Building or Project Manager where appropriate.
- **Emergency Services** can obtain Register information from the Asbestos Manager via the EO Customer Services Centre, 020 7594 8000. (See Appendix "Emergency Procedures")

**5 Updates**

The Register is updated by the Asbestos Manager.

Individuals, departments or organisations who affect data in the Register must supply relevant information to the Asbestos Manager.

For example, where an Agent is the Duty Holder (see "Duty Holder"), the College Asbestos Register and its upkeep remains the responsibility of the College. The College will retain the Asbestos Register, which will be available for consultation on request. All asbestos related activities must be notified to the College and undertaken only by College-approved Licensed Asbestos Contractors, so that the Register can be updated.

Update may be required after:

- Identification of further ACMs
- Surveys
- Removal of ACMs
- Inspection/monitoring exercises
- Changes in building layout or area use.

At the "AMP Review" the Head of Health & Safety, Estates Operations will assess the range and quantity of amendments received.

**6 Audit**

Regular Register audits will be instructed by the Head of Health & Safety, Estates Operations. This will include comparison of representative Asbestos Register entries against site inspections and records of asbestos remedial works.

The audit report will be made available to all relevant parties and will form part of the AMP Review.

**Risk Assessment of ACMs****Appendix 5: Risk assessment of ACMs****Assessment System**

All ACMs in the Asbestos Register are objectively assessed by the Asbestos Manager using a formal numerical scoring scheme. This considers aspects of materials assessment and priority assessment as described in the HSE document HSG 227 'A comprehensive guide to managing asbestos in premises'.

The materials assessment considers features of the material, the priority assessment takes into account the environment in which the ACM is found and the likelihood that persons may be exposed to asbestos fibres.

The scheme considers the following parameters:

- product type
- condition
- surface treatment
- asbestos type
- location
- position of material, for example how accessible it is during normal building occupancy
- susceptibility to damage
- number of people potentially exposed
- whether the material is subject to maintenance, refurbishment or other possible disturbance.

The Asbestos Manager manages and keeps details on the scoring scheme and reviews the scores annually.

ACMs with higher assessment scores are likely to require greater consideration regarding remediation measures than those with lower scores.

## Management of ACMs

### Appendix 6: Management of Asbestos Containing Materials (ACMs)

#### 6.1 Management of ACMs

Management options stated within the Asbestos Register are assigned by the Asbestos Manager and are considered the appropriate choice at the time of Register review.

The final choice of asbestos management option is taken by the Head of Maintenance after consideration of the assessment score and discussion with relevant parties, for example, those with information on future maintenance or refurbishment plans.

Long term ACM maintenance considerations, including cost, resources, potential for exposure etc, will be taken into account and opportunities taken for removing materials, particularly during periods of building closure or refurbishment.

In general ACMs with higher risk scores will be identified for remedial works, whilst those with lower scores will be retained within the management scheme for in-situ materials.

Records of decisions made, together with any discussion and rationale supporting such decision, will be kept by the Head of Maintenance.

#### 6.2 Inspection of ACMs

Formal re-inspections of known or suspected ACMs, will be carried out by a UKAS accredited Inspection Body and will be arranged and co-ordinated by the Asbestos Manager. Re-inspection will require checking of known ACMs against Register information.

An outline scope of work may be prepared by the Asbestos Manager for re-inspections; this may give requirements such as:

- Programming of the works
- Access arrangements
- Reporting arrangements

Re-inspection findings will be:

- Used to update the Asbestos Register
- Subject to formal risk assessment

The **inspection period** will be set by the Asbestos Manager, taking into consideration a review of current risk assessments and previous inspection history. ACMs of higher score may be subject to more regular re-inspection than those of lower score.

The inspection period will be documented in the formal AMP Review and Action Plan.

#### 6.3 Leaving ACMs in place

Where ACMs are in good condition, with minimal potential for fibre release, they may be left in-situ. The Head of Maintenance is responsible for ensuring these materials are kept in a sound condition.

#### 6.4 Regular Inspection

ACMs left in-situ will be subject to an inspection regime. The Asbestos Manager will determine the inspection period, likely to be 6 or 24 months dependent on risk assessment.

## Management of ACMs

### 6.5 Labelling of asbestos containing materials

Labelling with standard 'asbestos warning labels' or fixing of appropriate warning signage will be carried out to all known accessible ACMs considered to be of significant risk where this is deemed to:

- help prevent accidental damage, and
- not cause undue concern

Labelling of lower risk materials, for example, packing to soil pipes, seals to ductwork, may not be carried out if other control mechanisms e.g. site awareness, are considered adequate in preventing accidental exposure.

### 6.6 Improvement works

Where the ACM has minor damage, simple repair and/or sealing (encapsulation), may be appropriate. The technique and materials used will be dependent on the ACM and may include over-cladding or use of liquid applied encapsulants. These encapsulants are typically polymeric applications which dry to give a robust water resistant surface. Repairs and any encapsulation measures will be undertaken by a Licensed Asbestos Contractor, with the local area being isolated, either by constructing an enclosure or using local exclusion techniques.

### 6.7 Removal of asbestos materials

The term 'removal' is used to describe both the removal of bulk materials and the decontamination of areas where debris or trace asbestos contamination has been identified.

Removal of ACMs is carried out as a result of:

- Such work being stated within the Action Plan
- Recommended works related to planned projects, or
- Unplanned circumstances, for example:
  - identification of high risk ACMs
  - damage to ACMs
  - ACMs subject to maintenance or building works not foreseen during the AMP Review.

The option to remove ACMs will be authorised by the Director of Estates Operations for aspects of on-going management of ACMs, and the Project Manager for any specific building or project works.

The Project Manager will authorise the financial spend related to the removal works, the extent of such work will be based on recommendations given by the Asbestos Manager or appointed advisor. The responsibility for arranging and co-ordinating asbestos remedial works lies with the Project Manager, it is anticipated that they will appoint the Asbestos Manager to take on all relevant tasks. Further details are within Appendix 7.

Removal of ACMs is an operation with inherent risks and requires effective management.

Consideration of building occupation, co-ordination with other projects, effective use of budget, etc. will be taken into account when arranging remedial works.

#### 6.7.1 Remedial works planning must allow sufficient time for key stages, including:

- Agreement of scope of works
- Re-instatement requirements assessment
- Contractor's quotation period
- Method statement assessment
- Decant arrangements
- Statutory HSE notification
- Occupant Liaison meetings
- Pre-start meeting.

## Management of ACMs

### 6.8 Completion of asbestos works

The Asbestos Manager generally provides a completion document to the Project Manager, this will include:

- a clear summary of what materials have been removed
- project references
- contact and documentation details
- comment on residual asbestos risks

### 6.9 Remedial Works Records

These are held by the Asbestos Manager, with relevant documents copied to the Project Manager.

Records include as minimum:

- Works specification
- Removal method statement
- Air monitoring reports
- Certificate of Re-Occupation with 4 Stage Clearance documentation (where relevant)
- Waste consignment notes

Records will be held for an appropriate period.

### 6.10 Disclosure of information

Initial requests for information must be made to the relevant Manager, for example Building or Project Manager, or Safety Office. Enquiries should then be routed, if required, to the Asbestos Manager via the EO Customer Services Centre. Where relevant, for example where issues relate to health or financial aspects, the Asbestos Manager will forward the request to the appropriate Imperial College authority.

### 6.11 Minor works associated with asbestos containing materials

Circumstances may arise and render it necessary for ACMs to be handled/removed other than by an HSE licensed contractor. There may also be situations where access to an asbestos work enclosure is required by another trade or ICL employee.

These works will be of a minor nature and will be co-ordinated by the Asbestos Manager.

Such works will be extremely limited and are likely to be confined to:

- Collection of asbestos cement (AC) debris or materials
- Movement of electrical items (with an asbestos content)
- Minor works involving asbestos-containing textured coating (“Artex”).
- Entry by an ICL Maintenance Engineer, or external contractor, to assist with electrical, plumbing or other services issues. The assistance of these engineers with services isolations is increasingly relevant to reduce non-asbestos risks for asbestos operatives.

Removal of compressed asbestos fibre (CAF) gaskets from pipe flanges is NOT to be undertaken by any ICL employee.

Each type of work is to be notified in advance to the Asbestos Manager for review.

A record will be kept by the Asbestos Manager of all reviews and of all related records.

Where works are carried out by regular/term Contractors the key personnel will be expected to attend the appropriate Imperial College asbestos awareness training session. These ‘**Preferred Contractors**’, likely to be a small number of companies, will have an enhanced awareness of College procedures and knowledge of the site. Where works are carried out by ICL Maintenance personnel or term contractors the training, PPE and record requirements will be assessed by the Asbestos Manager and the Estates Operations H&S Manager.

The Asbestos Manager will hold a listing of these Preferred Contractors.

## Management of ACMs

### 6.12 Tenancies

The College manages a large property portfolio; the management may be via the Director of Estates Operations, or The Investment Portfolio Office. In both cases, unless by written exception from the Director of Estates Operations, the premises should be managed as per the ICL AMP.

Tenants (in non-domestic premises on a management lease) should be made aware of the existence and purpose of the College Asbestos Register. Such tenants currently include the MRC, NHS and Wellcome Trusts.

### 6.13 Dilapidations inspections at the end of Tenancies

At the end of a tenancy, the Colleges Premises Managers should arrange an asbestos re-inspection in addition to any dilapidations survey (for relevant buildings).

### 6.14 Where the College is a tenant – or where buildings are used by members of the College

If the College is on a “Full Repairing and Insuring” lease, it will be responsible for all maintenance and repairs including the asbestos management arrangements (i.e. this AMP). This would apply to *most* but not all buildings on the hospital campuses.

Otherwise, the asbestos management arrangements will be the responsibility of the Landlord (or the Employer), in which case members of the College must follow these arrangements and so need to be cognisant of them, and in the case of third party providers of student accommodation, audit them on occasion.

For those buildings constructed before 2000 and not controlled by the College, it is particularly important for College managers to be familiar with the emergency procedures for accidental release. These should be held by the Building Manager.

If the presence of asbestos is suspected, the Building Manager must be notified, and if still unsure, the College Asbestos Manager (via the EO Customer Services Centre). If asbestos is identified, the College Asbestos Manager will notify the Building Manager.

In the event of an emergency; Evacuate and isolate the area immediately if a suspected release has taken place and contact the Building Manager (see Appendix 9 – Emergency Procedures).

Never drill into or otherwise damage a wall or ceiling, as unidentified asbestos may be present. Ensure that before any proposed invasive works are undertaken, that the Building Manager and the Asbestos Register are consulted.

### 6.15 Reciprocal auditing arrangements

Where appropriate (for example when the College is the major or sole occupier of a Trust building), wherever possible reciprocal auditing arrangements should be agreed between the College and the building controller for the technical aspects of the AMP i.e. quality of analysis, notification to occupants, removal process, agreement on approved licensed asbestos contractor.



**Project Management Procedures for all  
Building Works**

refurbishment, maintenance, IT, decant etc

**Appendix 7: Project Management Procedures for all Building Works – refurbishment, maintenance, IT,  
decant etc including all related services routes****1. Work**

For the purpose of this AMP the term ‘work’ is used for any activity that has the potential to affect the fabric, finishes or services of a building, or which requires entry to services areas or voids.

**2. Review of work area**

All works within the College estate with the potential to alter or damage the fabric of the building, service voids, building services etc, must be reviewed by the Project Manager with regard to:

- Possible presence of ACMs
- Control measures to be taken to avoid damage or exposure
- Any necessary remedial/removal works
- Potential impact on project programme.

This review is to be at a level appropriate for the project in terms of its scale of refurbishment, known asbestos data, and regulatory requirements. Projects such as decant/recant exercises must also be reviewed as these have potential for soft strip/decorating etc type of activities that may affect ACMs. Services routes for the project area such as for data, pipework and ductwork are also to be reviewed. The Project Manager is expected to seek guidance from the Asbestos Manager, or equivalent, and make use of their specialist asbestos consultancy services where relevant.

Initial contact with the Asbestos Manager should be via the EO Customer Services Centre. Additional information and/or site walks may be required to give the Asbestos Manager a more informed picture of the project requirements.

The review must be carried out by the Project Manager at an early stage of the project to allow sufficient time for project implications of ACMs to be assessed. The review should be prior to or include the potential for ICL or external Consultants to be involved in site investigations related to, Feasibility Studies. Discussions on project design and site inspections may be required dependant on scale of project.

**3. Asbestos Manager’s Role**

On receipt of the EO Customer Services Centre Task request the Asbestos Manager will assess the project and undertake, as relevant, the following:

- Assessment of cost of, and agreement on, scope of Asbestos Management Services
- Review of known ACM information
- Discussion on project detail with Project Manager
- Site walk(s) with Project Manager and/or relevant contractors
- Site investigation, such as a formal survey (See Appendix 3)
- Report issue.

A preliminary Report may be generated by the Asbestos Manager for certain works, generally those related to larger or more complex projects.

The preliminary Report may include:

- Information on known ACMs
- Level of site investigation required, for example any requirement for management or refurbishment/pre demolition surveys, including their impact on occupants and project timetable
- Requirement for services isolations
- Requirement for space e.g. contractors welfare, decontamination unit, analytical office etc.
- Requirement for additional services e.g. use of a Licensed Scaffold Contractor to provide access.

The final Report style and content will be dependent on the complexity of the project and may range from an email to a Survey Report with marked up plans.

Guidance on remedial measures required, including any control measures, such as protection or further labelling of ACMs, and budgets may be included.

**Project Management Procedures for all  
Building Works**

refurbishment, maintenance, IT, decant etc

Recommendations made by the Asbestos Manager for remedial action should be incorporated into the Project Works.

**4. Implementing the recommendations of the Asbestos Manager**

Where remedial works are required these may include:

- Remedial/removal works being undertaken to ACMs NOT DIRECTLY affected by the project scope, but which lie within, or directly adjacent, the project location. The intention being to use the refurbishment period to improve the College environment, with minimal disruption to building use. Such remedial works will normally be funded by the Project.
- Co-operation with programming of the works, for example, the preference that asbestos remedial works are carried out as a priority activity either prior to the Main Contractor taking possession of the site or at the start of the possession period.
- Assisting in making space available for asbestos remedial works equipment, such as parking for decontamination units (DCUs), appropriate office space for the Analyst.
- Arranging any necessary services isolations or enabling works – such as steam shutdowns, cutting out of non-asbestos redundant ductwork, removal of fixtures, fittings, furniture or certain building features.

**5. Informing Project personnel**

Aspects to be considered include:

- Site handover arrangements comprising documentation such as the Asbestos Managers Report, Asbestos Works Completion statements etc.
- Inclusion of, and familiarity with, ICL emergency procedures, as set out in Appendix 9.
- Site familiarisation walks with key personnel such as Site Foreman, Asbestos Manager et al.
- Highlighting the requirement for asbestos information to be reviewed when project changes, such as M&E scope, or extension of project area, are proposed. The review to be undertaken by the appropriate Project team member, this may include the Main Contractor, Principal Designer and/or Project Manager.
- Particular attention to co-operation and co-ordination where Contractors who do not hold an HSE License for asbestos works are used for enabling works prior to asbestos remedial works being undertaken. It is essential that these 'non-asbestos' contractors are
  - aware of any risks and related controls
  - undertaking enabling works that are sufficient to provide necessary access etc for the future Asbestos Licensed Contractors works
  -

**6. Additional or suspect ACMs**

The Project Manager is responsible for making sure works are halted if suspect ACMs are discovered and that further advice is sought.

In practice, it may be the Site Manager who takes the first action of stopping works to the affected areas, they should then contact the Project Manager. Further guidance would normally be obtained from the Asbestos Manager however, in certain situations the Project Manager may consider that they have adequate knowledge, competency and experience to resolve the issue themselves.

**7. Removal Works**

Further details on the removal of ACMs are within Appendix 6.

Project Management Procedures for all  
Building Works

refurbishment, maintenance, IT, decant etc

**8. Project stage summary/programme**

The following gives guidance on typical projects where the Asbestos Manager has been instructed to undertake a review/investigation etc. Workload, investigation constraints, HSE notification periods etc, will affect the actual programme.

The examples assume the Project Manager has supplied all relevant project information and there are no delays in accessing areas or decanting prior to asbestos removal works. The examples show that more complex projects can require at least 3 months planning prior to completion of asbestos related works.

Item	Description of work				
	New cable route.  No asbestos remedial works required	Redecoration of a residence.  ACMs present	Maintenance work.  Remove 2m section of asbestos lagged pipework	Reconfiguration of 1 office.  Asbestos ceiling tiles	Refurbishment of 3 laboratories.  Numerous ACMs
<b>Action in Week:-</b>					
<b>Project Manager:</b>					
Contact EO Customer Services Centre	1	1	1	1	1
<b>Asbestos Manager:</b>					
Agree services scope and management costs	1	1	1	1	1
Preliminary report	1 - 2	1 - 2	1 - 2	1 - 2	1 - 2
Survey	1 - 2	1 - 2	1 - 2	1 - 2	1 - 3
Report issued	1 - 2	1 - 2	1 - 2	2 - 3	3 - 4
Further survey e.g. 'Refurbishment/Pre-Demolition' in unoccupied areas	-	Not required	Not required	Agreed with Project Manager Assume Week 4	Agreed with Project Manager Assume Week 4
Remedial works required	None	None. Decorating contractor to receive site specific asbestos awareness	Remove asbestos insulation to pipework	Remove ceiling tiles	Remove bulkheads, fume cabinets and exhaust ducts
Remedial works specification	None	None	2	4	5
Appoint Contractor	-	-	3	6	8
<b>Contractor:</b>					
HSE Notice period	-	-	3 - 4	6-7	9 - 10
Site work start	-	-	5	8	10
Asbestos site works completed.	-	-	5	9	12

**Specialist Contractors****Appendix 8: Specialist Contractors****1. Licensed Asbestos Removal Contractors**

Remedial works to ACMs, including encapsulation, will generally be carried out by a Contractor holding a License under the Asbestos Licensing Regulations.

In specific circumstances non Licensed Contractors or College employees may undertake work where this falls outside the asbestos licensing requirements and is of acceptably low risk. In these circumstances all relevant health and safety regulations, including provisions of the Control of Asbestos Regulations must be complied with. The Asbestos Manager must review and accept proposed procedures and work methods.

**2. Choice of Licensed Contractor and management of the Preferred Contractor list**

Contractors will be subject to in-house selection and approval procedures, co-ordinated by the Asbestos Manager.

Audits of Contractors undertaking work with ACMs will be carried out by the Asbestos Manager. Such audits will include assessment of at least:

- Quality of completed work
- Safety issues throughout the remedial works
- Compliance with Contractor's own Safety Management systems
- Feedback and safety etc. information from the UKAS accredited Consultancy engaged for the associated inspection and analytical works
- Adherence to programme

**3. Use of Advisory Services**

Advice and services may be sought from external specialist organisations.

Only organisations holding the appropriate qualification and UKAS accreditation, for example to ISO 17020 for building surveys for ACMs or to ISO 17025 for analytical services will be used.

## Emergency Procedures

## Appendix 9: Emergency Procedures

## 9.1 Definition of an emergency

Emergencies are unexpected situations requiring sudden and urgent action. In the context of asbestos the immediate measures taken should prevent or minimise exposure to airborne asbestos fibre. Following this action there may be a subsequent requirement to bring in specialist contractors such as an UKAS accredited Analytical Consultancy or Licensed Contractor. The Asbestos Manager will assess and organise suitable arrangements, inform Head of Health and Safety and if appropriate inform the campus Main Security Desk.

The following emergency situations are considered:

**Situation A: Personnel in areas of potential elevated airborne asbestos fibre****For example:**

- Known or suspected ACMs are damaged
- Asbestos remedial works cause an uncontrolled release of airborne fibres, for example if an asbestos removal work enclosure is damaged

**Action to be taken:**

- Do not disturb the material or stay longer in the affected area than is essential
- If the problem is within, or associated with, a Project area, contact the Site or Project Manager. If the issue is not project related contact the EO Customer Services Centre on 48000. If the building is *not* managed by Imperial College, evacuate the local area, prevent others from entering the vicinity and inform the area controller.
- The Site Manager/ EO Customer Services Centre will then contact the Asbestos Manager who will provide site specific advice.
- If the emergency relates to a damaged ACM, and it is safe and appropriate to do so, cover the material with polythene or other barrier to prevent disturbance by air currents, shut down air handling units if relevant and possible.
- Seal off the area – close windows, doors etc so long as this is possible without causing further disturbance to the material/staying longer in the area.
- Evacuate the local area and prevent others from entering the area by using signage, sealing up doorways or posting guards at an appropriate distance. If Security is contacted, ensure they do not enter the affected area, unless casualties with life-threatening injuries are within the work area; the prime role of Security is to secure the area and prevent others from entering.
- Where an individual's clothing may have been contaminated by asbestos Security should be immediately contacted. The individual should wait, ideally in a location away from others, for Security to arrive.
- Where exposure to airborne asbestos fibre is likely to have occurred it is recommended that the individual(s) ensures that a suitable note is added to their employers HR records and/or their GP Doctor's file.
- Where relevant ICL Security will provide an information sheet to affected individuals, this will contain basic guidance and be authored, and regularly reviewed, by the Asbestos Manager.

**Additionally for Project Areas:**

- The Site Manager should halt all local works and take any necessary or recommended action. Such action may include informing staff and building occupants, clearing the area or site etc.
- The Project Manager must be informed of all developments.
- General, contractor specific and site health and safety reporting procedures may be triggered by these events.
- Where the emergency has been caused by finding damaged ACMs it is likely that the longer term action will be the removal of the material, with the costs borne by the project.

**Emergency Procedures****Situation B: Non specialist personnel required to enter areas of elevated airborne asbestos fibre****For example:**

- Plumbers or electricians are needed within known contaminated areas to carry out emergency services isolations
- Experts (i.e. Emergency Services) are required to enter asbestos work enclosures or areas of potential asbestos contamination to give first aid or fight fire.

**Action to be taken:**

- Contact the Asbestos Manager, via the EO Customer Services Centre or Site Manager (for Project Works).
- Access can only be given if the individual has received appropriate training, protective equipment and is accompanied by, or has received appropriate guidance from, the Licensed Contractor, Analyst or the Asbestos Manager.

**9.2 Reports and Records****Imperial College Dangerous Occurrence Report**

Reports are to be completed by the Individual/appointed representative or Project Manager and submitted to the Imperial College Safety Department using the on-line reporting system SALUS.

Examples of dangerous occurrences include: a suspected asbestos-containing ceiling tile falling into the corridor; an item of equipment is opened and the presence of asbestos is suspected within; a decorator sands a wall and asbestos is suspected to be present below the surface.

**Asbestos Exposure Form**

If a member of Imperial College considers they may have been exposed to airborne asbestos fibre, they must contact the Asbestos Manager, so that the relevant form can be completed. "Exposure" will generally be taken to mean exposure to a known or possible level approaching or exceeding a control limit, as defined in the Control of Asbestos Regulations, 2012.

The form will record information including

- Name
- Date and time of incident
- Nature of exposure (damage or work to ACM, uncontrolled release of asbestos fibre from asbestos removal enclosure etc.)
- Location of incident
- Type of asbestos fibre/asbestos material
- Duration and level of exposure
- Copies of any associated analytical records
- Details of advice etc given to individual (health risks of asbestos etc.)

The Asbestos Manager will provide technical information and the completed form will be sent to the Head of Health and Safety and the Director of Occupational Health for review and a further assessment of health risk. The Director will discuss any concerns with persons who may have been exposed. The form will be retained by Occupational Health for forty years and a copy given to the staff member or student with the recommendation that it be kept indefinitely. If control limits are exceeded, the Director of Occupational Health will contact the GP of the exposed person.

Where the exposure relates to non-Imperial College employees the Asbestos Manager will record known details, these will be kept within the Imperial College Asbestos Management record system with a copy sent to the Head of Health and Safety.

**Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)**

Where exposure occurs above the control limits set in the Control of Asbestos Regulations the requirement to report the incident under RIDDOR will generally be assessed and carried out by the College Safety Director. If the exposure occurs in an area under the control of a Principal Contractor the reporting requirement is expected to be their responsibility.

**Contractor Safety Reports**

Company generated reports should be copied to the Project Manager and forwarded by them to the Asbestos Manager and to the Imperial College Safety Department. Any significant incidents are to be immediately reported to the Projects Team and Imperial College Safety Department to permit an investigation.

## Emergency Procedures

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### 9.3 Disclosure of information

The College Safety Department may request copies of any reports in order to carry out investigations into the underlying causes of the emergency

Requests from individuals or other parties should be made to the relevant Manager, for example Building or Project Manager. It is unlikely that information would be released unless for individual e.g. insurance, purposes or to provide anonymous data for consideration in the AMP Review.

### 9.4 Training and information on Emergency Procedures

Certain staff may require specific training and / or information on asbestos emergency procedures. These would include Building Managers, Hall Wardens, Security and Fire teams, Faculty and Campus Safety Managers. On hospital campuses, information on NHS Trust Emergency Procedures should be provided to Building Managers.

Information and Training

**Appendix 10: Information and Training**

**1. Information**

Information on the AMP and the management of ACMs will be available to all relevant personnel and organisations. General and College specific information may be posted on relevant notice boards or produced for distribution in electronic format.

Where more specialist knowledge is required this may be sourced from specialist consultancies and publications, including HSE documents.

**2. Training**

It is acknowledged that effective management of ACMs requires knowledge of a specialised area of health, safety and construction works.

The Director of Estates Operations will ensure that a suitable level of expertise is available at Imperial College, either by in-house training of employees, by using external training courses or resources, or by establishing a relationship with a specialist external organisation such as a UKAS accredited Consultancy.

The Head of Health & Safety, Estates Operations assesses training requirements and co-ordinates it's provision. The intention is to provide an open and responsive culture where individuals have an awareness of the risks and an appreciation of the effectiveness and suitability of, and requirement for, management procedures.

The key areas covered by in-house training sessions are:

<b>AMP</b>	– Purpose, general arrangements, availability and location
<b>Asbestos Register</b>	– Responsibilities of employees and key groups
<b>ACMs</b>	– It's location, use and availability
	– Health effects
	– Their range and distribution at Imperial College
	– Their range and distribution in other countries
<b>Work practice</b>	– Safe systems and arrangements
	– Emergency Procedures
	– Working on other landlords' sites – Survey, Asbestos Register, AMP, Emergencies.

It is acknowledged that risk groups, such as new employees, newly appointed contractors etc, may require asbestos awareness training or similar as part of their initial Imperial College induction process.

In summary:

- Initial asbestos awareness/training will be carried out for relevant employees and contractors
- Continuing asbestos awareness/training will be carried out as necessary
- Problems or incidents with ACMs will be investigated and a review of training arrangements carried out if considered appropriate.

**3. Information, Instruction and Training**

The College undertakes "Day One" induction training for all of its members and its embedded contractors. This includes information on the "a" for asbestos warning sign, that ACMs are present in the College, and what the risks from ACMs are. Students are given a similar induction session on joining the College, and in addition Campus Services provides them with written information on the risk of asbestos in accommodation.

In addition to this the "Month One" Safety Training (MOST) and test is undertaken by all College employees; it contains furthermore detailed instructions on managing asbestos and recommends attendance at the College "Asbestos Awareness" training. This is a half-day training course which includes how to recognise asbestos.



Information and Training

An online resource ‘Asbestos and Imperial College’ was produced in 2018 by EO and is accessible to all those working at ICL. It covers key issues and includes individual assessment.

Finally, key groups, contractors and sub-contractors are given brief on-site Toolbox talks, this will include issue of the College asbestos poster and Emergency contact card where relevant.

4. Outline of training topics

The training agenda will be amended as required and so tailored to the requirements of the audience.

Topic	Group		
	Maintenance, Security, Technicians etc	Consultants, Contractors	Employees with extra Responsibilities
Asbestos health risks	✓	✓	✓
AMP and Procedures	✓	✓	✓
Responsibilities	✓	✓	✓
ACMs – uses and distribution at Imperial College	✓	✓	✓
Procedures for building works		✓	✓
Advanced knowledge			✓

Employees considered having extra responsibilities include:

- Director of Estates Operations
- Head of Health & Safety, Estates Operations
- Chief Information Officer for ICT
- Director of Campus Services
- College Safety Director
- Director of Occupational Health
- Head of Maintenance
- Project Managers and Principal Designers
- Building Managers
- Deans of Faculty and Heads of Departments and Institutes
- Hall Wardens

Agents who are Duty Holders are also expected to have a high-level of expertise and experience of asbestos management, either by in-house resources or via external Consultants.

Advanced knowledge may include formal qualification in health and safety or asbestos specific topics.

5. Specific training for certain tasks with ACMs

Where employees are expected to carry out works with ACMs specific training will be provided.

Such tasks may include:

- Collection of asbestos cement debris
- Labelling of ACMs
- Emergency sealing off/decontamination of areas following disturbance to ACMs.
- Minor works on asbestos-containing textured coating (‘Artex’),

The Training & Development Co-Ordinator will keep details of training agenda, training dates and which individuals have been trained for specific tasks.

## Information and Training

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### 6. Training review

The Head of Health & Safety, Estates Operations in conjunction with The Learning and Development Officer will review the training arrangements annually to assess if:

- All individuals/department/groups requiring training have been identified
- Re-training requirements are adequate
- College induction arrangements are adequate
- Course content is appropriate.

## Action Plan

### Appendix 11: Action Plan

The College Action Plan consists of the actions - both Management activities and remedial works - documented and agreed in the regular Asbestos Progress Meetings.

These actions contain priorities and timetables or targets for both remedial works e.g. removal works and non-remedial works e.g. training issues, survey requirements and are formally documented and monitored at regular Asbestos Progress Meetings, with detail being recorded in listings of 'Current' and 'Completed' tasks

Consideration of a timetable for any remedial works will take account of several factors including:

- ACM risk assessment score
- Building occupation constraints
- Financial resources
- Other planned building works.

Action Plan documentation is retained by the Director of Estates Operations and Head of Health & Safety, Estates Operations, with copies also held by the Asbestos Manager.

The AMP Review includes comment on the nature and progress of Action Plan items.

**Review of the Asbestos Management Plan****Appendix 12: Review of the Asbestos Management Plan (AMP)****1. Review purpose**

The Head of Health & Safety, Estates Operations will arrange a regular review of the AMP.

The intention of the review will be to assess:

- Management procedures and their effectiveness.
- Effectiveness of the management plan in terms of its integration into all matters relating to the building fabric and use
- Overall progress made against the Action Plan
- Suitability and maintenance of communication, instruction, training of personnel, employees and contractors
- Suitability and success of record keeping tasks

Significant findings and comments will be reported to the Director of Estates Operations. A record of the Review will be kept by the Head of Health & Safety, Estates Operations.

**2. Review Timetable**

The Head of Health & Safety, Estates Operations will set the timetable and date of the next review.

A Review will be:

- Carried out on a 12 monthly basis
- Considered when significant events occur - for example, on completion of major asbestos removal projects, following exposure of personnel to significant airborne asbestos fibre levels, transfer or increase of premises, or if arrangements within the AMP are no longer considered to be adequate.

**3. Review Attendees**

The Head of Health & Safety, Estates Operations will invite appropriate representatives. This will include at least the following key stakeholders

Director of Estates Operations  
College Safety Director  
Head of Occupational Health

**4. Review Agenda**

The Head of Health & Safety, Estates Operations will set the Agenda and will distribute to all relevant personnel in sufficient time for data and feedback to be collated.

The agenda will include some or all of the areas set out below:

- AMP
  - Compliance with HSE and Imperial College procedures
  - Management and Organisation structure
  - Audits and Reports
- Action Plan
- Remedial Works
- Asbestos Register
- Asbestos awareness/training
- Incidents with ACMs
- HSE reports

## Key Regulatory Documents

## Appendix 13: Key Regulatory Documents

	<b>Asbestos Regulations</b>
SI No. 2739	Control of Asbestos Regulations 2012
	<b>Asbestos – Approved Codes of Practice and Guidance</b>
L143	ACoP – Work with Materials containing Asbestos (2nd Ed) (2013)
HSG 53	Respirator protective equipment at work (2013)
HSG 247	Asbestos: The Licensed Contractors guide (2006)
HSG 248	Asbestos: The analysts guide for sampling, analysis and clearance procedures (2 <sup>nd</sup> Edition May 2021)
HSG 210	Asbestos Essentials (4 <sup>th</sup> Ed) (2018)
HSG 227	A comprehensive guide to managing asbestos in premises (2002)
HSG 264	Asbestos: The Survey Guide (2 <sup>nd</sup> Ed) (2012)
	<b>Health and Safety – Legislation (NOTE: The following list is not comprehensive)</b>
	The Health and Safety at Work Act 1974
SI 2014 3248	Construction (Design and Management) Regulations 2015 (CDM2015) (Where asbestos works are an integral part of the construction project works they will have specific requirements under the CDM 2015 Regs)
	<b>Health and Safety – Approved Codes of Practice and Guidance</b>
INDG453 Rev 1	Reporting accidents and incidents at work. A brief guide to the reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)