

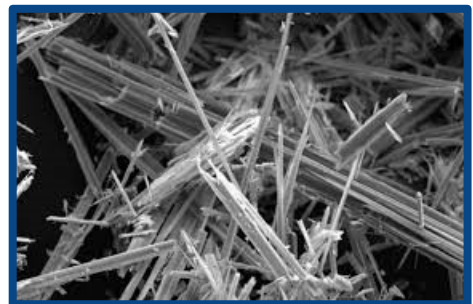


University of Bath

Asbestos Management Plan

For the management of asbestos containing material in
University premises

Sept 2024
Revision 11



Name of Policy:	Asbestos Management Plan
Purpose of Policy:	For the management of asbestos containing material in University premises
Policy Applies to:	All University staff, students, visitors, contractors and members of the public.
Responsible for its Updating:	Asbestos Compliance Manager
Final Approval by:	Director of Campus Infrastructure
Date Initiated:	August 2016
Date of Revision Approval:	Sept 2024
Proposed Date of Review:	Sept 2025 or when legislation or circumstances dictate. Fixed agenda item at the Quarterly Asbestos Group meetings

The enclosed guidelines must be complied with when working at the University of Bath.

You are advised to keep this document readily available for future reference.

Adherence to these guidelines will be monitored by University personnel, and any breaches will be treated seriously.

Revision History

Doc Rev	Date	Description of amendments	Revision author
	Aug-2016	Final document approved and issued	
1	Jan-2018	Amendment to damaged/discovered materials that could contain asbestos	Asbestos & Compliance Manager
2	Apr-2018	Change of title from Asbestos Operational Procedure to Asbestos Management Plan	Deputy Director of Safety & Wellbeing Asbestos & Compliance Manager
3	Jul-2018	Include David Hoare, M&E Compliance Manager, on list of University of Bath staff who hold BOHS P405 Management of Asbestos in Buildings:	Asbestos & Compliance Manager
4	Apr-2019	Complete review of document. Amendments to reflect transitional arrangements associated with moving to the new CAFM system. This includes amended plans to resurvey buildings to refresh asbestos log data.	Asbestos & Compliance Manager
5	Feb-2020	Review of document in relation to the Quality Management System revisions.	Asbestos & Compliance Manager, Compliance, Safety and Information Manager, Project Support Officer
6	Dec-2020	Review the roles within the plan to reflect changes in responsibility following the departure of the Compliance and Asbestos Manager SMT Approved.	Compliance, Safety and Information Manager, Customer Services Administrator
7	Dec 2021	Revision to the document to reflect the recruitment of an asbestos AE and an Asbestos and Water Compliance Manager / AP	Compliance Manager, Facilities Administrator
8	Nov 2022	Revision to the document to reflect Department of Estates restructure to Department of Campus Infrastructure and appointment of Asbestos Compliance Manager Addition of Data Management workflow Removal of redundant proforma	Asbestos Compliance Manager
9	Feb 2023	Updated Emergency procedure	Asbestos Compliance Manager
10	Oct 2023	Added MiCAD Login for Emergency Services Updated format of procedures Increased description of data management strategy Improved explanation of overall risk management approach Improved description of roles and responsibilities Standardised re-inspections to Annual Amended Appendix A – exemption from checking Asbestos register form Amended Appendix B – staff with P405	Asbestos Compliance Manager
11	Sept 2024	Updated Contractor details Added Deputy Director of Capital Works Amended current staff with P405	Asbestos Compliance Manager

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This document sets out the University of Bath's Asbestos Management Plan for managing and dealing with Asbestos Containing Materials (ACMs) in all its buildings.

This document was approved on ____23/09/24____

Signed: _____
Director of Campus Infrastructure

1.0 Introduction

University of Bath recognises its responsibilities and duties under the Health and Safety at Work, etc., Act 1974, to provide as healthy and safe an environment as is reasonably practicable for all staff, students, contractors, visitors and members of the public who visit the University campus.

The University of Bath's Asbestos Management Policy sets out its commitment and arrangements to manage asbestos in accordance with the general requirements of the Health and Safety at Work Act and the specific requirements of the Control of Asbestos Regulations (CAR) 2012. The Asbestos management policy imposes additional duties on Campus Infrastructure for the day-to-day management of asbestos containing materials.

The purpose of this document is to set out how Campus Infrastructure will discharge these additional duties by management regime for the control of asbestos containing materials (ACMs). This will be reviewed periodically as required by the University policy or where there are changes in the legislation, the Approved Code of Practice (ACoP) or HSE guidance.

Some buildings owned or occupied by the University of Bath were built or refurbished at a time when the use of asbestos containing materials (ACMs) in their construction was common. This extensive use means that there are still many buildings which contain asbestos.

The presence of ACMs in itself does not constitute a danger. However, there is a potential risk to health if such material is disturbed and fibres are released and become airborne. An isolated accidental exposure to asbestos fibres for a short duration is extremely unlikely to result in the development of asbestos related diseases.

Workers who disturb the fabric of buildings during maintenance, refurbishment, repair, installation and related activities may be exposed to asbestos every time they unknowingly work on ACMs or carry out work without taking the correct precautions. The purpose of managing asbestos in buildings is to primarily protect individuals or, where this is not reasonably practicable, minimise exposure for these groups of workers and other people in the premises.

To manage ACMs effectively, information is needed on whether asbestos is, or is likely to be, present in the buildings, so that an assessment can be made about the risk it presents and appropriate measures put in place to manage those risks.

The management of asbestos materials is controlled by various legislation, most notably the Control of Asbestos Regulations (CAR) 2012.

Responsibility for the management of ACMs lies with the University as Duty holder and employer, who delegate day to day responsibility to the Duty Holder (Vice Chancellor) who has delegated this task to the Director of Campus Infrastructure as the Responsible Person. Under Reg 4 of (CAR) 2012, all staff, students, other visitors and users have an obligation to assist in complying with that duty under Health and Safety at Work, etc. Act 1974.

2.0 Scope of Work

This Asbestos Management Plan applies, **without exception**, to all properties owned and maintained by the University of Bath. It also applies to any property where the University of Bath has maintenance responsibility, whether owned, rented, leased, etc., unless specifically excluded in the relevant contractual documents.

The University of Bath has given the Department of Campus Infrastructure sole responsibility for the management of the building stock portfolio and no other department or section may commission works upon the building fabric and services unless prior approval has been given in writing by the Director of Campus Infrastructure or his / her nominee.

This document exists to outline the operational procedures for the management of asbestos during normal use and maintenance activity of the University's buildings. It provides guidance for the Department of Campus Infrastructure management and trades staff to carry out their duties safely and in accordance with the University Asbestos Management Policy.

The Department of Campus Infrastructure will, as far as reasonably practicable, prevent the exposure of staff, students, contractors and any other visitors to University's buildings, to airborne asbestos fibres. To achieve this The Department of Campus Infrastructure undertakes to:

- Comply with University health and safety policy and all relevant legislation including, but not limited to, the Control of Asbestos Regulations (CAR) 2012 and any associated Approved Codes of Practice (ACoP) or Guidance.
- Provide University of Bath Department of Campus Infrastructure staff with the relevant level of asbestos awareness training that they require to safely discharging their duties. Support University of Bath departments with asbestos awareness training needs as required.
- Maintain an asbestos register with up-to-date risk assessments for all buildings constructed prior to January 2000 that is accessible to all persons using University Buildings on request to Campus Infrastructure. New acquisitions will be assessed upon completion.
- Ensure all contractors and subcontractors have attained a satisfactory and relevant level of asbestos awareness training, before commencing work e.g. a UKATA or IATP approved asbestos awareness training course.
- Undertake Refurbishment & Demolition Surveys prior to any work upon the building fabric unless previous assessments are sufficient.
- ACMs identified in a hazardous condition or posing a potential hazard to planned works will immediately be risk assessed and made safe by a competent person and the necessary management action applied.
- Ensure that removal of ACMs will only be performed by University approved HSE licensed asbestos removal contractors (LARC).
- Restrict access of University personnel and other users to Asbestos Areas (i.e. those areas where Respiratory Protection or other control measures are in place), unless suitably trained and protected, and according to the documented method. They will not work directly upon, or otherwise disturb ACMs unless authorised to do so.
- Review this document and attendant procedures quarterly at the Asbestos Management Group meeting; document and implement the findings of these reviews. The management system should also be independently reviewed on a regular basis, usually annually.
- Promote awareness of the hazards of ACMs and the University's asbestos policy, management and operational procedures through training of Department of Campus Infrastructure staff.

3.0 Roles & Responsibilities

Roles and responsibilities for the management of asbestos are described in the University's Asbestos Management policy. This section details how these responsibilities are discharged on an operational basis.

Department of Campus Infrastructure staff with line management responsibilities will ensure that all staff are familiar with the contents of the University's Asbestos Policy and Asbestos Management Plan as far as it is relevant to their roles and responsibilities.

The Duty holder responsibility is delegated to the Vice Chancellor
Responsible Person is the Director of Campus Infrastructure

Responsibility for the implementation of this operational document, along with the operational management of ACMs in premises, will rest with the Director of Campus Infrastructure. The Asbestos Compliance Manager and the Compliance Manager will oversee administrative responsibility, whilst requirements around specialist information and support will be referred to the asbestos framework consultant.

Responsibility for the safe management of asbestos for all project, capital works and maintenance will be overseen by the Interim Deputy Director – Projects and Deputy Director Capital (to be appointed), with all operations works overseen by the Deputy Director – Operations. Individual members of staff within both teams are provided with suitable training and supported by the Asbestos Compliance Manager, Compliance Manager and asbestos framework consultants.

In the event of the Compliance Manager or the Asbestos Compliance Manager being unavailable guidance is to be sought from the Director of Campus Infrastructure.

The Universities asbestos framework consultant (LIFE Environmental) will provide technical assistance and recommendations relating to asbestos assessment, management and removal as well providing a review and guidance on the Universities processes, procedures and documentation relating to asbestos.

The Universities licensed asbestos removal framework consultants will provide technical assistance and recommendations relating to safe remediation and removal of asbestos containing materials.

3.1 All University Employees, Contractors and Other Users

All University Employees, Contractors and Other Users (including students) are to comply with the requirements of the University Construction Safety Policy, University Asbestos Management Policy and the contents of this plan.

3.2 Construction (Design & Management) Regulations (CDM 2015)

CDM 2015 makes the University of Bath accountable for any significant impact that decisions and resource allocation have on the health, safety and welfare standards achieved on CDM projects. As CAR2012 requires duty holders to effectively manage asbestos in buildings, the University holds information about the location and condition of ACMs in the asbestos register, which can be accessed by liaison with the Asbestos Compliance Manager. Prior to the implementation of any new system, the Asbestos Compliance Manager and Compliance Manager will ensure appropriate training and instruction will be provided to all Campus Infrastructure staff and support them in ensuring it is also provided to the contractors for whom they are responsible.

Department of Campus Infrastructure staff that are authorised to commission projects works on the buildings and grounds of the University of Bath will adhere to the requirements of CDM 2015, CAR 2012 and should refer to this Asbestos Management Plan and any relevant asbestos surveys including the asbestos register. They must ensure that a suitable and sufficient risk assessment of the risk posed by the presence of asbestos has been made,

including commissioning refurbishment and demolition surveys where required, and that all contractors are aware of the presence of ACMs through the asbestos register and survey documents.

3.3 Licensed Asbestos Removal Contractors (LARCS) & OTHER SUBCONTRACTORS

LARCS involved in works on the University of Bath buildings shall:

- Maintain a current license from the HSE to work with asbestos.
- Have in place current and adequate insurance cover for the asbestos works to be undertaken.
- Ensure working practices are in compliance with current legislation and all associated Approved Codes of Practice (ACoP) and Guidance.
- Attend site to assess and prepare quotations against asbestos work specifications.
- Raise any issues relating to health and safety, or potential additional costs, to the project manager at the earliest opportunity.
- Provide a written Plan of Work and risk assessments to the relevant parties prior to works commencing. Those parties are:
 - In the case of non-notifiable works the project manager and the Asbestos Compliance Manager
 - In the case of notifiable works the Principal Contractor, Principal Designer, the Project Manager and the Asbestos Compliance Manager
- The Plan of Work and risk assessments must indicate the resources and timetable allocated to the project in accordance with CAR 2012.
- Agree Emergency procedures with the relevant parties.
- Provide statutory notice to the Health and Safety Executive (HSE) as may be required prior to the commencement of any asbestos related works. Copies of all such notices must be submitted to the project manager before work commences.
- Carry out their obligations under the contract, including maintaining high standards of safety and hygiene in asbestos works, and all related work areas, and supplying labour, materials and equipment of the highest standard, complete with all supporting documentation as may be required.
- Arrange transport and disposal of asbestos waste materials in accordance with legislative requirements and provide copies of all consignment notes, carrier's registration(s) and waste management licence(s), test and reoccupation certificates via consultant analyst to the project manager and the Asbestos Compliance Manager
- Carry out regular inspections of the work environment. Any defects found, or any reported by the project manager or the Asbestos Compliance Manager
- Comply with the Department of Campus Infrastructure Code of Safe Working Practices for Contractors'.
- Inform the project manager and the Asbestos Compliance Manager of any additional elements of work which are to be agreed. The Plan of Work and Risk Assessment must be updated accordingly.

- Liaise with the appointed UKAS accredited asbestos consultant to ensure the satisfactory progress of the works.

3.4 Asbestos consultants (analysts & surveyors)

Asbestos Consultants involved in works on the University of Bath buildings will be expected to:

- Maintain and demonstrate UKAS accreditation relevant to the requested task.
- Upload documentary evidence of the competence (qualifications, training, and experience) of the individual surveyors and analysts carrying out work using the Campus Infrastructure' contractor management software.
- Maintain adequate insurance cover for the tasks to be undertaken.
- Provide support to the Asbestos Compliance Manager and the Department of Campus Infrastructure as may be required.
- Review and comment on, when requested, specifications, contractor's Plans of Work and risk assessments, work procedures, etc.
- Carry out analytical works and inspections as agreed with the Asbestos Compliance Manager as well as additional work that may be requested.
- Report to the project manager or the Asbestos Compliance Manager any defect or non-compliance relating to the contractor's performance, including suitability of the work area, adherence to the Plan of Work etc. Where the project manager or the Asbestos Compliance Manager is not immediately available the surveyor or analyst will be expected to take such measures as may be deemed necessary to ensure the health and safety of contractors and subcontractors and building occupants.
- Inspect 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.
- Carry out air monitoring tests as may be required.
- Report to the Asbestos Compliance Manager any aspects of asbestos management encountered on site which could give rise to health risks, e.g. breaches of the Asbestos Policy and Procedures, suspect or damaged asbestos.
- Issue formal reports, including Certificates of Re-occupation, to the project manager and the Asbestos Compliance Manager on completion of any site works.
- Update the Universities MiCAD system following analytical works if requested.
- Availability 24hours per day / 7 days per week
- For emergency incidents: Arrive on site within 2.5 hours during normal working hours (0800-1900) and within 4.5 hours outside normal working day.

4.0 Operational Procedures

4.1 Implementation

This Management Plan document will be formally adopted by the Department of Campus Infrastructure and all other employees, students, contractors and visitors to the University of Bath Estate. It will form the basis for all asbestos management activities under the control of the Department of Campus Infrastructure.

This document is held within the Department of Campus Infrastructure, can be viewed as a PDF via the University website.

4.2 Management of Asbestos Containing Materials (ACMs)

The Department of Campus Infrastructure assisted by competent persons will manage the asbestos within its estate through a combination of the following three approaches. The approach in each given scenario is dependent upon the risk assessment of the material, followed by a cost-benefit analysis. The approach regime is:

4.2.1 In-situ Management

The preferred option is always to leave ACMs in-situ provided such material can be managed in such a way as to not pose a hazard to health. Asbestos that is in good condition with a low risk of accidental damage is perfectly safe and may be left in place for many years. Identified ACMs will be risk assessed using the methodology described on the Health and Safety Executive's website ([Priority and Material Assessments](#)). This information is recorded in the asbestos register and its condition monitored under re-inspection regime.

4.2.2 Remediation and Management

Asbestos that is currently in a poor condition need not necessarily be removed.

If the assessment identifies an ACM as posing an elevated risk, it may be that remedial work such as encapsulation can reduce the risk to an acceptable level, so that the material can be left in-situ and managed as above. ACMs requiring remediation should be assessed on a case-by-case basis, and the difficulty and costs involved should be balanced against any achievable reduction in risk. It should be noted that certain ACMs require such stringent control measures during encapsulation that removal may prove to be a better option in the longer term.

4.2.3 Removal

This should always be considered a last option, but sometimes it can be the only way of safely dealing with an asbestos material. The University will only allow licensed asbestos removal contractors (LARCs) to perform removal operations on its buildings, irrespective of whether their use is mandatory in a particular case or not. As noted above, removal is not an easy option, and frequently it can prove impossible to remove all ACMs from a given area, as they may have been installed mid-construction for example. Asbestos removal works should be planned in detail, and all parties should be aware of what is required, the desired outcome and how to most safely achieve it. Furthermore, a risk assessment will be carried out after the ACMs removal for further encapsulation, or four stage clearance or reassurance certificate will also be produced to ensure full compliance.

4.2.4 Asbestos Register

All asbestos records relating to buildings containing ACMs at The University of Bath will be stored on the MiCAD asbestos register.

The asbestos register will be accessible to all persons that require access. Where information is requested by university staff outside of the Campus Infrastructure Department the Asbestos Compliance Manager will provide this information along with any advice and guidance on the contents of the risk assessments, with support provided by other Campus infrastructure staff out of normal working hours. This will ensure that people requesting the information are provided with appropriate advice to understand the type of asbestos material identified, its risk rating and potential hazards. Where users require further reassurance, they can also seek advice from the University's Safety, Health and Employee Wellbeing Office or the Campus Infrastructure Compliance Manager.

An Exemption Form (see Appendix A, page 32) must be used if the contractor has been exempted from checking the asbestos register. This could either be due to the nature of their normal works of non-routine work, where the task is confined to specific requirement / equipment, or for non-invasive works where there are no risks from the presence of asbestos.

- The Asbestos Compliance Manager will be responsible for ensuring that the information held is kept up to date at all times and particularly when:
 - Previously unrecorded asbestos materials are found; or
 - Asbestos abatement remediation is performed; or
 - A regular re-inspection is carried out; or
 - The condition of an ACM changes for whatever reason.

Contractors working on building fabric or services will be able to access the asbestos register remotely prior to commencement of work. Details on how to set up log in details will be sent to all contractors listed in our contractor management system. Campus Infrastructure staff responsible for managing contractors should satisfy themselves that their contractor has reviewed the register prior to commencement of work, by checking the MiCAD Portal Activity Report

Where contractors arrive on site without setting up their log in or reviewing the register, this can be done on their mobile phone, or using the PC in the Campus Infrastructure lobby. Administration in the use of the system can be provided by the Compliance Manager, the Asbestos Compliance Manager or Campus Infrastructure Helpdesk.

Project managers overseeing minor works and maintenance activities are responsible for ensuring that suitable and sufficient asbestos information is provided to their contractors. This should be provided at tender stage, as far as is reasonably practicable, but in any case, before any works are allowed to commence. The Asbestos Compliance Manager will discuss the scope of works with the project manager and/or contractor and will check existing information to see whether further survey work is required.

Where no survey information is available then it will be presumed that asbestos containing materials are present. The project manager or the Asbestos Compliance Manager will engage one of the University's asbestos consultancy framework contractors to carry out an appropriate Refurbishment and Demolition Survey to ensure that suitable and sufficient asbestos information is available.

Arrangements for routine maintenance works carried out by Campus Infrastructure' personnel are covered in Section 6 of this plan.

Arrangements for major projects, building refurbishments and similar projects are covered in Section 7 of this plan.

4.2.5 Priority Plan of Action

The University has a wide range and significant number of ACMs that must be managed over time. To systematically reduce the risk from Asbestos to all building users and site visitors as far as reasonably practicable ACMs are addressed in line with risk and priority level. ACMs can be categorised as immediate-, short-, medium- and long-term priorities based on their risk assessment score and chance of disturbance and fibre release.

Immediate

Items that currently pose a significant risk of asbestos exposure to building users are considered an immediate priority. Our emergency procedures provide guidance on how to deal with immediate suspected exposure or disturbance events whilst the University provides several channels for staff, students and visitors to report any problem found with buildings or potential ACMs. Any items that need immediate action or assessment can be reported to security, raised via our 'report a problem' system in Archibus or reported directly to a member of Campus Infrastructure. Our Asbestos register is then reviewed, and further assessment made by our trained contractors where needed. If an item poses an immediate risk the area is isolated, then our Asbestos Consultants and LARCS engaged to assess and remediate the issue as soon as possible.

Short Term

The University prioritises ACM which are likely to be affected by planned works and maintenance or that show signs of damage, but do not present an immediate risk of asbestos exposure to building users, as short to medium priority items. This short-term priority list is driven by our planned and responsive programmes where we know disturbance would otherwise occur, all ACMs are removed from work areas that are affected directly and as many additional as possible within available budget. ACMs targeted for removal or remediation are agreed between the Asbestos Compliance Manager and Long-Term Maintenance Team who oversee works.

Medium Term

Alongside items effected by planned works, data is reviewed on a building-by-building basis to identify ACM's that are damaged, in need of repair or show high risk scores reflecting their potential to cause asbestos exposure. This review is completed by the Asbestos Compliance Manager on an ongoing basis as asbestos data is collected. Residential buildings are to be targeted first due to their high occupancy rate, with all other buildings and areas to follow. Proposed removal and remediation programmes are agreed at the Quarterly Asbestos Management Group in conjunction with the Compliance Safety Information Manager and the Director of Campus Infrastructure.

Long Term

ACM's which are in good condition, not routinely accessible, hidden within the building fabric or that otherwise present a low risk of fibre release and show lower risk assessment scores will be addressed as long-term priorities as the campus develops. The University aims to strategically reduce the level of ACMs on campus whilst also maintaining and providing high quality, modern facilities for the organisation to meet its goals and students' expectations. Buildings which are most at need of large-scale refurbishment or replacement will be targeted for long term development as funds and conditions allow, during this process all ACM's practicable will be removed. Level of risk from Asbestos is included within the assessment of which buildings require redevelopment so it is expected that such works will address significant numbers of medium priority items.

4.2.6 Storage and maintenance of Asbestos Records

All asbestos records from 2019 onwards are stored in MiCAD. anything earlier is archived and can be accessed by request to the Compliance Manager or the Asbestos Compliance Manager. All staff and contractors requiring access to the asbestos register are instructed to set up accounts with MiCAD that will enable them to view the register. Instructions are available from the Asbestos Compliance Manager.

Asbestos data entered will use standard (HSG 264, HSG227) Material and Priority assessments as provided by a UKAS approved surveying organisation or a suitably qualified University member of staff, with yearly re-inspection events to monitor condition.

Areas inaccessible at time of survey will be noted as 'No Access' with a reason provided, these access issues are to be resolved as soon as reasonably practicable to ensure all accessible areas are surveyed.

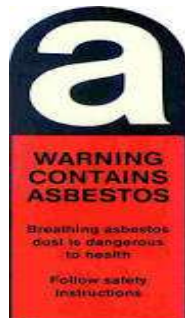
Permanently inaccessible voids will be recorded as such, with a precautionary ACM added matching the worst-case material present elsewhere in the building, a yearly re-inspection event will be added to ensure the area is permanently inaccessible.

All historical information will be retained so that the University will have an ongoing record of management actions. Information on materials that have been removed should be retained, albeit clearly identified as removed. All documentation relating to asbestos materials, including removal, should be for a period of at least 40 years after the demolition of a property.

4.2.7 Labelling of ACMs

Generally, the University of Bath will not label ACMs in plain view to avoid causing undue alarm to building occupants or incite vandalism. An exception could be ceiling voids and service ducts, etc, which will be considered on a case-by-case basis.

The labelling of ACMs is always to be regarded as the 'last line of defence', and the absence of a label should never be taken as an indication that a material does not contain asbestos. Use of the standard warning label on an obviously non-asbestos material has, in the past, caused it to be completely ignored with damage to the asbestos material behind.



Standard Asbestos Labels

Labelled materials will require inspection on a regular basis as per their risk assessment and, where practicable.

4.3 Surveying & Bulk Sampling for Asbestos

All surveying, sampling and analysis works will be undertaken by asbestos consultants from the University's asbestos consultancy framework. Each of these consultants have UKAS accredited laboratories. All surveyors hold appropriate training certificates appropriate to the work that they will be undertaking. Their presence on the approved list will be an indicator that their accreditation is up to date, and that their insurance cover is adequate. The level of accreditation required will be:

- Sampling: The organisation will hold UKAS accreditation for sampling of asbestos in bulk materials according to ISO17025:2005.
- Analysis: The organisation will hold UKAS accreditation for analysis of asbestos in bulk materials according to ISO17025:2005.
- Surveying: The organisation will hold UKAS accreditation for surveying of asbestos in premises according to ISO17020:2012.

The University will update the list of approved laboratories on an annual basis, or in the event of a change in status. Accreditation will be checked against the UKAS website and will not rely on evidence submitted by the organisation.

New survey reports will be audited upon receipt.

4.3.1 Building Assessment

New acquisitions to the Estate will be assessed as follows:

The initial assessment will consider the date of construction, date of any major refurbishment, floor area and known asbestos in order to arrange buildings by survey priority.

A survey programme can then be developed which will investigate the higher risk properties first.

Generally, those constructed between 1945 and 1999 will be considered most likely to contain asbestos, but it should be noted that pre 1945 properties may well have had substantial amounts of asbestos installed during any refurbishment.

Those properties constructed wholly after 2000 will not require survey or full assessment.

4.3.2 Survey Types

Management Surveys: The most common survey type usually involves the sampling of suspect materials. These can usually be performed in occupied buildings and should locate most asbestos materials that may be encountered during normal occupation and routine maintenance. However, all such surveys will be risk assessed prior to being carried out to ensure that surveyors and occupants are not exposed to the risk of exposure to asbestos fibres. If management surveys require access to areas that have been presumed to contain asbestos, such as ceiling voids, then the risk assessment will take due account of the risk of release of fibres and a survey under controlled conditions will be required. These surveys are NOT suitable prior to major works.

Refurbishment & Demolition Surveys: Often referred to as fully invasive or destructive surveys, these are highly focused inspections designed to find all possible asbestos materials within an area or property. They are most suitable prior to major refurbishment or demolition and cannot be performed while an area is occupied. If a survey is carried out in an area that will subsequently be reoccupied prior to any maintenance or refurbishment works being carried out, then the building must be made safe before reoccupation is permitted.

Refurbishment & Demolition surveys require very precise planning, and it should be ensured that the prospective surveyor is aware of the planned building works, their extent and what is expected from the survey.

4.3.3 Material Identification

All suspected asbestos materials shall be identified by analysis performed by an approved laboratory unless they can be positively identified as non-asbestos, e.g. timber or plasterboard or yellow fibreglass. Soft insulation boards and other insulations should always be considered suspect until a positive analysis result can be obtained. If, for whatever reason, they cannot be analysed, then they shall be assumed to contain Amphibole asbestos in the case of insulation and insulation boards, or Chrysotile in the case of vinyl floor covering or thermoplastic floor tiles and cement materials.

Visually similar materials may be assumed to be of the same content as sampled materials within a building, where strong evidence of their homogeneity exists. In all instances bulk sampling for asbestos must be representative and in the case of textured coating, the sampling frequency should be higher given its non-homogenous nature.

Care must be taken with painted insulation boards and enclosed runs of pipe insulation that there is not a mixture of materials. If a material is to be worked upon or removed, and any doubt exists, it must have a negative sample analysis result, or be presumed to contain asbestos and treated accordingly.

4.3.4 Building Plans

CAD plans are available for all buildings, and all staff within Campus Infrastructure who are involved with changes to buildings must advise the planning and records section of any changes to these plans.

Updates to the asbestos register, must be made whenever there is an action taken regarding any asbestos anywhere on the Estate, and it will be the responsibility of the Asbestos Compliance Manager to ensure that this is performed.

Once implemented, and surveyors will systematically use the MiCAD template, the process will be automated, and the asbestos register will be automatically updated.

Any data or layout anomalies are to be raised with the Asbestos Compliance Manager and Planning Manager and resolved prior to data entry into the MiCAD system.

4.4 Re-Inspection & Re-Assessment

4.4.1 Material Assessment

This information is usually supplied by the UKAS accredited surveyor, as it is determined by the actual materials physical condition. However, this score can also be assigned by a suitably trained member of University staff.

4.4.2 Priority Assessment

Based on local knowledge of the site use, surveyors will need to be supported by Campus Infrastructure staff in scoring the priority assessment.

See overleaf for Generic Priority Assessments to be used for ACMs across the University of Bath Estate:

4.4.3 University of Bath – Generic Priority Scores

* Based on 'worst case' scenario of AIB shadow batten or textured coated ceilings ** Based on daily plant checks, filter changes etc.

Room Type	Normal occupant activity	Likelihood of disturbance				Human Exposure Potential				Maintenance Activity			Total
	Main activity (0-3)	Location (0-3)	Accessibility (0-3)	Extent/Amount (0-3)*	Average	Number of occupant (0-3)	Frequency of use (0-3)	Average time area in use (0-3)	Average	Type of maintenance activity (0-3)	Frequency of maintenance (0-3)	Average	
Plant rooms ** (Comms/ electrical/ main server)	1	2	1	3	2	0	3	1	1	2	3	3	7
Circulation (corridors/ stairwells/ lobbies)	1	2	0	3	2	3	3	3	3	1	1	1	6
Café/restaurant	1	2	0	2	1	3	3	3	3	1	1	1	6
Teaching room	1	2	0	2	1	3	3	2	3	1	1	1	6
PC Lab	1	2	0	2	1	3	3	3	3	1	1	1	6
Laboratory	1	2	0	2	1	3	3	2	3	1	1	1	6
Offices (meeting rooms)	1	2	0	2	1	2	3	3	3	1	1	1	6
Kitchen (industrial)	1	2	0	2	1	2	3	3	3	1	1	1	6
Lecture theatre	1	1	0	2	1	3	3	2	3	1	1	1	6
Event Space	1	1	0	3	1	3	2	3	2	1	3	2	6
Open Learning Space	1	2	0	2	1	3	3	3	3	1	1	1	6
Library	1	1	0	3	1	3	3	3	3	1	1	1	6
Voids	0	3	1	3	2	0	1	0	1	2	2	2	5
Shops	1	2	0	2	1	3	3	3	3	1	1	1	6
Sleeping accommodation	1	2	0	2	1	1	3	3	2	1	1	1	5
Kitchen	1	2	0	2	1	1	3	2	2	1	1	1	5
Post Room	1	2	0	2	1	1	3	3	2	1	1	1	5
Reception	1	2	0	2	1	1	3	3	2	1	1	1	5
Staff Common Room	1	2	0	2	1	3	3	1	2	1	1	1	5
Ducts (vertical penetration)	0	3	1	2	2	0	1	0	1	2	2	2	5
Loading Bays	1	1	1	2	1	1	3	1	2	1	1	1	5
WC	1	2	0	2	1	0	3	1	1	1	1	1	4
Storerooms (archive stores)	1	2	0	2	1	0	3	0	1	1	1	1	4
Cleaners' cupboards	1	2	0	1	1	0	3	0	1	1	1	1	4
Roof Space	0	3	0	2	2	0	0	0	0	1	2	2	4
Lift shafts	0	3	0	1	1	0	0	0	0	2	2	2	3
Roof	0	0	0	2	1	0	0	0	0	1	1	1	2

4.4.4 Combine material and priority score

The maximum combined material and priority score is 24. Unless advised otherwise, by the Asbestos Compliance Manager the frequency of reinspection (as detailed in 4.4.5 below), will apply.

4.4.5 Re-Inspections of ACMs

In accordance with Approved Code of Practice (ACOP – CAR2012) any ACM identified or suspected during the inspection process will need to be re-inspected periodically in order to monitor its ongoing condition.

As part of our approach towards the management of asbestos within our buildings we will need to determine how often such re-inspections are undertaken; this will need to be determined with the following in mind:

- **Physical location of the ACM** - is it easy to reach, is it readily accessible or hidden in an area that is remote from the normal operational activities within the space, potential for damage as a result of maintenance activities.
- **Local Environment** – what activities and or numbers of people will be impacted by the re-inspection.
- **Potential for damage** – will the ACM be damaged as a result of water ingress, normal operational activities and or vermin activity for instance.

Unless advised otherwise agreed the minimum timeframe for re-inspection will be 12 months. This is based upon the criteria outlined above and any additional site-based features as applicable to each scenario. Where surveyors recommend removal, but this is deemed not reasonably practicable then the Asbestos Compliance Manager will consult with the surveyor to identify an alternative course of action that mitigates against the risk of exposure to fibres. This may be through encapsulation, removal of access or some other form of suitable action.

The University will not generally label ACMs. However, the asbestos surveyor may apply any such agreed labelling media to areas that may be subjected to increased activity such as maintenance-based activities, for instance, in order to reduce the risk of accidental disturbance/damage. If this requirement cannot be satisfied the asbestos surveyor is to seek advice from the University's Asbestos Compliance Manager to ensure that we do not place other interested parties in harm's way in respect of ACMs.

4.5 Asbestos Abatement & Remediation

As part of contract and / or project planning, a Refurbishment & Demolition survey will be undertaken, and a Scope & Specification for abatement works produced. The abatement need will then be programmed into the refurbishment plan. This will usually be coordinated by the Project manager.

Should the risk assessment banding of an ACM during a Re-inspection increase to the degree that remediation is required, this work will be scoped and performed as soon as possible.

If an ACM is damaged by building works, accident or vandalism, then all works in the immediate vicinity will cease immediately and an assessment of the situation will be made by the project manager with input from a specialist consultant as necessary.

4.6 Air Monitoring and Stage 4 Clearance

- Air monitoring must only be performed by a UKAS accredited laboratory holding accreditation to ISO17025:2005 for both asbestos in air sampling and fibre counting.
- Air monitoring will be instigated by the University to meet all legislative requirements (e.g. clearance testing after asbestos removal) but may also be used to ensure the effectiveness of control measures by the following means:
- Leak Tests: Leak tests are performed outside asbestos enclosures to prove that the integrity of the enclosure is being maintained, and that no asbestos fibres are escaping.

- Background Tests: Usually performed adjacent to asbestos works that do not require an enclosure, or during controlled works that may disturb asbestos materials.
- Reassurance Tests: Performed in the presence of asbestos materials that are not being actively disturbed. Their purpose is to reassure building occupants that the materials pose no actual hazard.
- Air testing will be conducted where Notifiable, Notifiable Non-licensed and Non-licensed works are being completed to meet regulatory requirements and ensure the effectiveness of control measures.

These tests are generally measured against the Control Limit as defined in (CAR) 2012, but for the purposes of the University they will be used to ensure that no staff, students, visitors or contractors- are exposed to unacceptable levels of airborne respirable fibres.

5.0 Approved Suppliers

5.1 Approval of Asbestos Consultants and Contractors

To ensure and maintain quality and consistency of approach, only asbestos consultants and contractors, including Licensed Asbestos Removal Contractors (LARCs) that are on the University' Approved Suppliers schedule are to be used.

All newly appointed suppliers are to be notified to SHEW Services.

The Term Tender process will also be used to determine suitability.

LARCs: The following details shall be requested of all contractors for retention on file:

- A copy of their current HSE licence (NB HSE licences are valid for a period of 1, 2 or preferably 3 years).
- A copy of their current insurance certificates, demonstrating the level of the various covers.
- Membership details of trade organisations, e.g. ARCA.
- Details of participation and performance in site audit schemes, e.g. ARCA, Site Audit Accreditation Scheme or Santia Safe Contractor.
- For new additions to the list, references should be provided.
- Information on any Improvement or Prohibition notices issued to the company by HSE.

The HSE Prosecutions database should be searched, and any records identified should be further investigated with the company or filed as appropriate.

In addition to the above, it is expected that LARCs will always maintain a high level of performance. To monitor this the Asbestos Compliance Manager will ensure regular site inspections are carried out by framework consultants.

Framework Asbestos Consultants: Evidence of current UKAS accreditation. Accreditation is granted separately for bulk sampling, bulk analysis, air testing, fibre counting and surveying therefore it should be ensured that the consultant holds accreditation for the task for which they are to be employed.

- Copy of HSE supervisory licence if applicable.
- A copy of current insurance certificates, demonstrating the level of the various covers.
- For new additions to the list, references should be provided.

The HSE Prosecutions database should be searched by the Asbestos Compliance Manager and Compliance Manger, and any records identified should be further investigated with the company or filed as appropriate.

5.2 Contractor Control

All Campus Infrastructure / University approved contractors who are working in buildings containing, or likely to contain asbestos, will be provided with a contractor Health & Safety Induction which includes a section on asbestos awareness within the University.

[Working with the University as a Contractor or Consultant \(bath.ac.uk\)](http://bath.ac.uk)

It will be a requirement that all Campus Infrastructure approved contractors who work for the University will ensure that their staff have received adequate asbestos awareness training supplied by a suitable and sufficient provider. If required, the company should confirm this in writing.

Contractor's induction by the University will include:

- General information regarding asbestos, its dangers & health effects, the law and responsibilities.
- General information relating to the University estate including those buildings where asbestos is more widely used and the commonly encountered forms.
- Specific information relating to what asbestos information they should receive prior to commencing works and emphasising that they should ask for it if they do not receive it.
- The procedures to be followed if suspected asbestos materials are encountered during works, i.e. in an emergency.
- ALL contractors are to sign in and out at the Department of Campus Infrastructure prior to and on completion of works.
- ALL contractors are to view the asbestos register for the area they are working in. A documented record is to be kept in the Department of Campus Infrastructure (or electronically on MiCAD).

The Universities current framework contractors are:

Framework Asbestos Consultants			
Contractor Name	Primary Contact	Contact Email	Contact Phone No.

6.0 Routine Estate Maintenance

Campus Infrastructure staff are most likely to encounter asbestos whilst conducting routine maintenance works, including PPMs. This includes activities in ceiling voids, lift shafts, Comms Rooms, Service Risers and Electrical Cupboards. It must be ensured that Campus Infrastructure staff are never inadvertently sent to work upon ACMs to rectify a fault or install new services, etc.

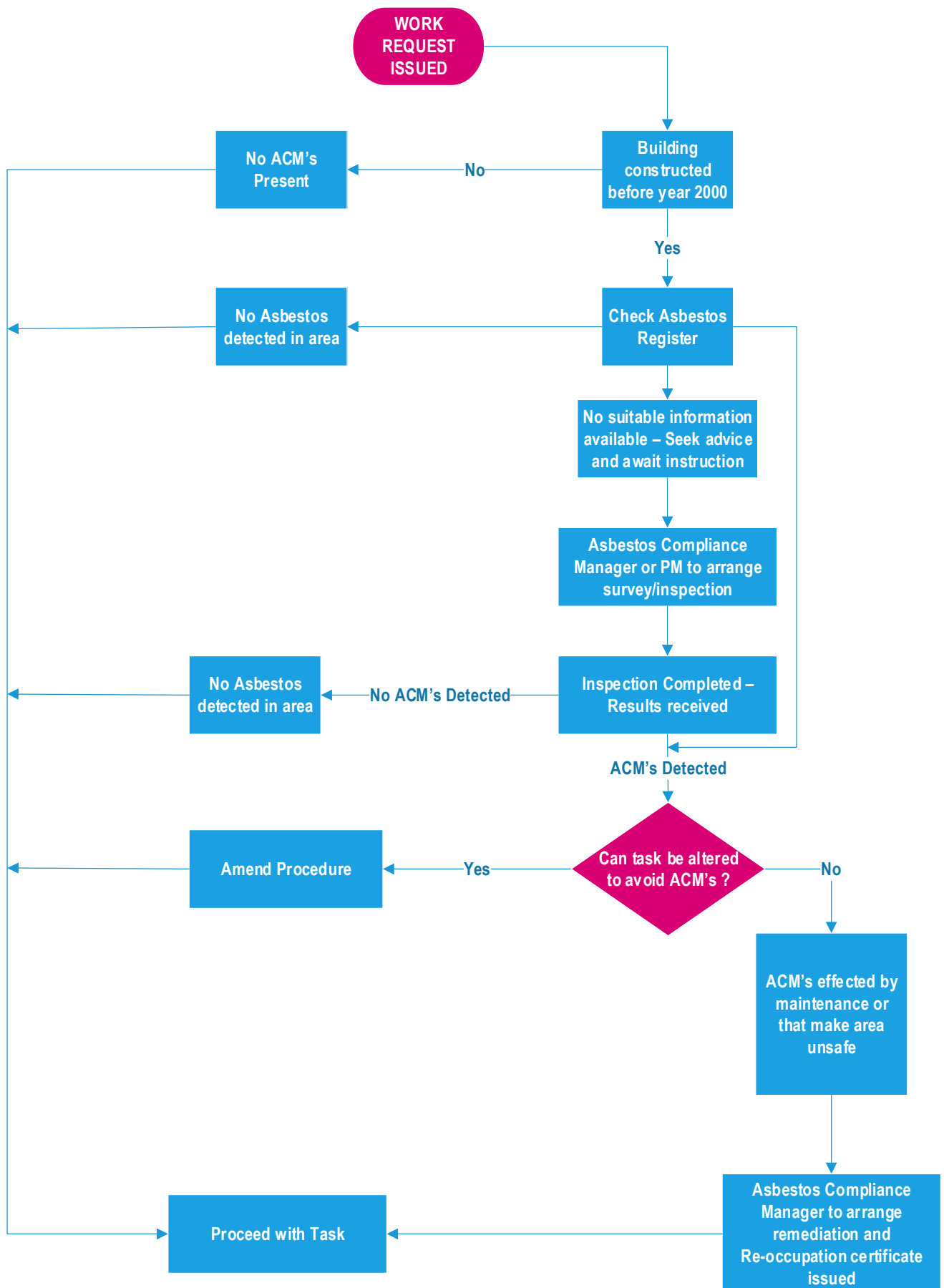
No access is permitted to ceiling voids throughout University buildings built before year 2000 on and off the campus until a suitable risk assessment has been completed including checking the asbestos register.

No works permitted to internal, external or partition walls throughout the University buildings before year 2000 on and off the campus until in receipt of written authorisation.

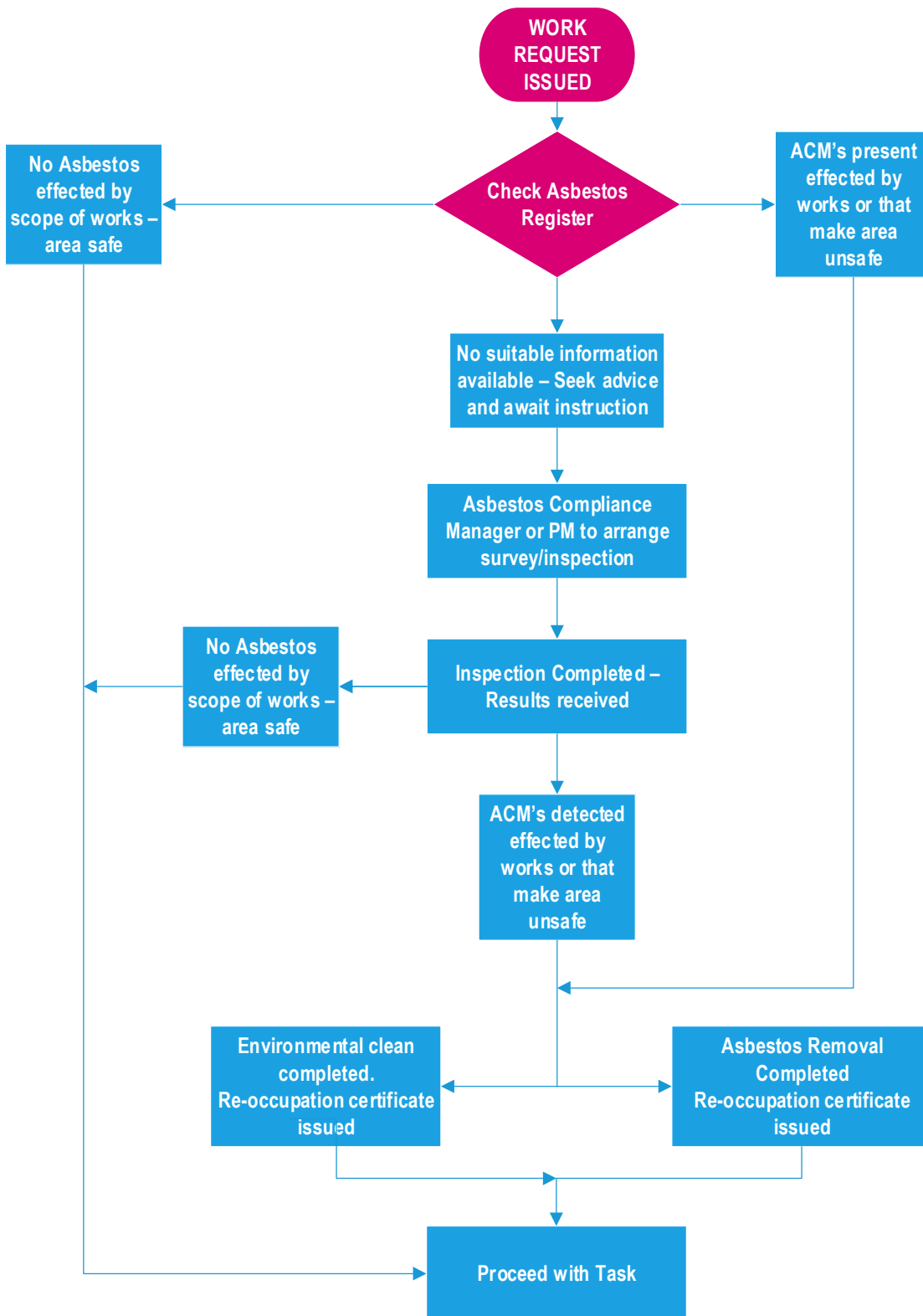
All works should be considered for the presence of ACMs. This can be based upon an interrogation of the asbestos register, via the Asbestos Compliance Manager and, where necessary, consultation with the asbestos consultants, together with an assessment of the particular building and the location of the planned works. Information to consider in this assessment could include:

- Interrogation of the register relevant to the area of planned works.
- Consideration of the building profile and known asbestos within the property.
- Consideration of the destructiveness of the planned works and whether investigation is required prior to the works.
- See Flowcharts 1 & 2 overleaf.

6.1 Management of Asbestos for Maintenance Activities (Flowchart 1)



6.2 Management of Asbestos for access to ceiling voids, lift shafts, Comms Rooms, Service Risers and Electrical Cupboards (Flowchart 2)



7.0 Projects

All projects shall have an initial asbestos assessment performed in the early stages of planning as per the University Asbestos Policy and CDM 2015.

If the project is a new build on a Greenfield site requiring no connection to existing service ducts or plant rooms, etc., then the assessment may be accordingly concise and not involve further investigation.

However, most projects will require some type of formal risk assessment and site investigation which may include:

- Contaminated land survey: most sites will require an inspection for various types of contamination, and it should be ensured that a check for asbestos debris from previous demolition is undertaken and any notification of contamination of pollution must be sent to SHEW Services.

If a project involves alteration, demolition or the attachment of a new build to an existing construction, then a Refurbishment & Demolition survey must be performed prior to works commencing. The only exceptions will be:

- If an assumption is made that an area contains asbestos and that all materials will be removed under controlled conditions.
- If the building or the area is unsafe to enter.
- If it is known that the building was constructed after January 2000.

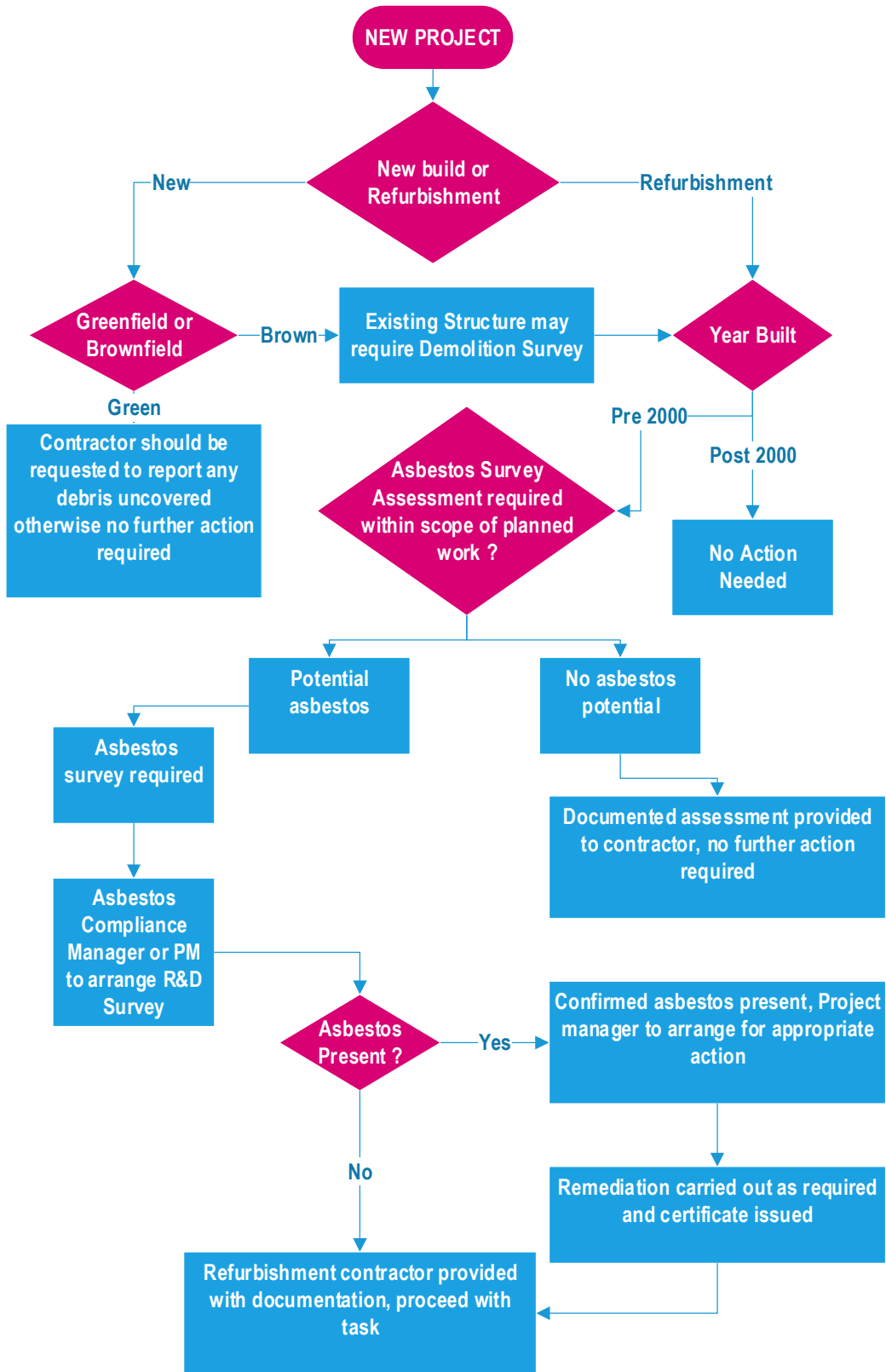
Any projects involving the disturbance of the fabric of the building will have an appropriate Project Register entry and Associated Project Report, completed by the project manager and necessary action taken by the University's framework consultants with cooperation from the Asbestos Compliance Manager. Buildings unsafe to enter should be assessed for likely asbestos risk based on age, use and construction type. The planned Refurbishment & Demolition works should be carefully carried out with clear instructions to the building contractor to stop immediately should any suspect material be observed, or as soon as it is safe to enter to allow an inspection to be carried out.

All assessments, paperwork and decisions relating to projects, including the Asbestos Project Report, should be documented, and retained within the project file by the project manager.

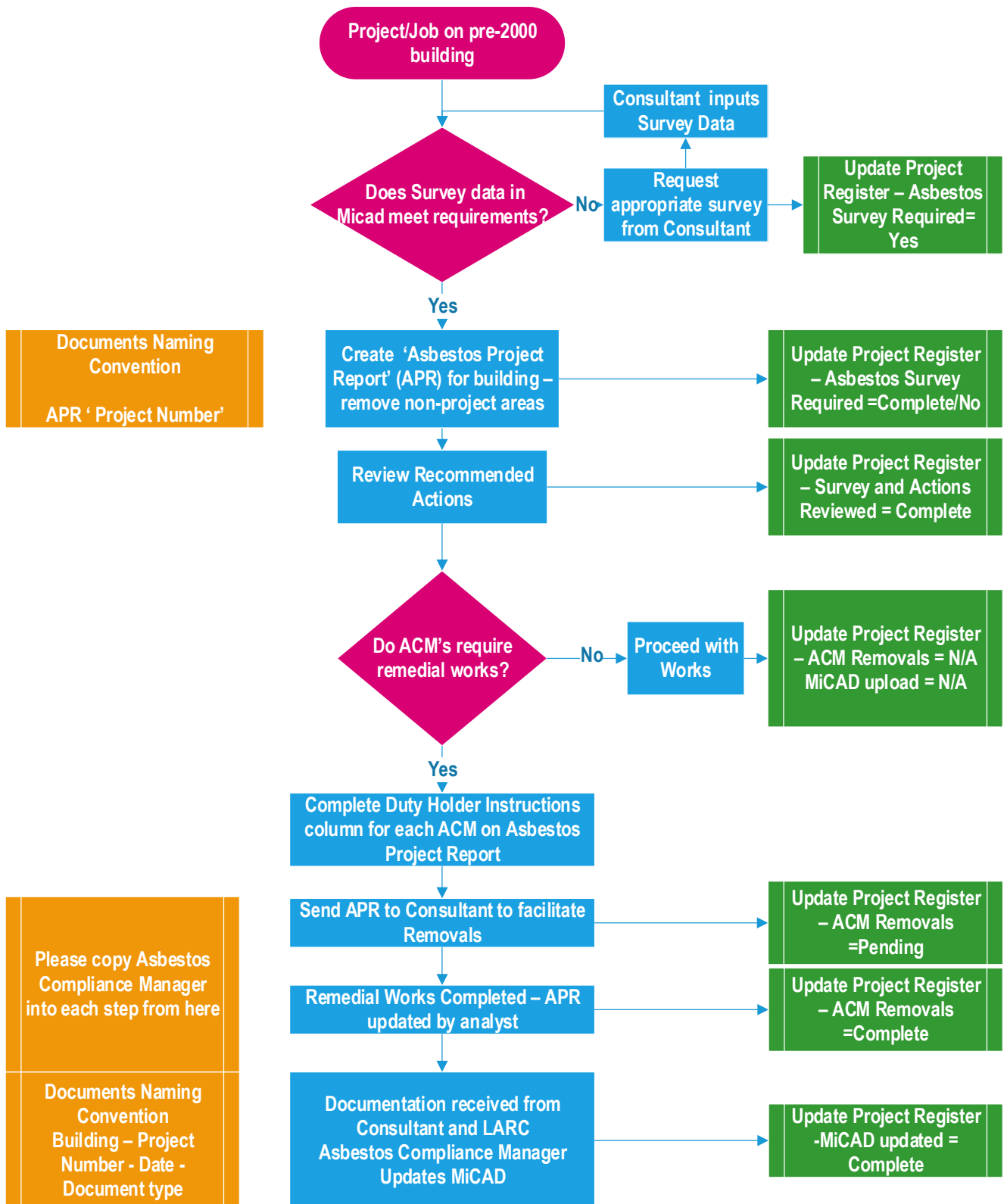
Copies to be supplied the Asbestos Compliance Manager who will reciprocate with any documentation supplied direct to them. [See Flowchart 3.](#)

No work should commence on any project until the Plan of Works and RAMS have been reviewed and approved by a competent person i.e., an experienced person holding BOHS P405 qualification, or equivalent.

7.1 Management of Asbestos for Projects (Flowchart 3)



7.1 Management of Asbestos Data for Projects (Flowchart 4)



The project data management flow chart shows the steps required to ensure the university meets the requirements of CAR (2012) and records the actions of those working on behalf of the Duty Holder to ensure the Universities compliance. Use of the Asbestos Project Report and Project Register is required to record the Universities instructions to our contractors, the actions taken, the resulting changes to ACMs and to facilitate the required updates to MiCAD following remedial works.

8.0 Training

The University will ensure that all members of staff who will encounter asbestos as part of their daily duties will receive an appropriate level of training.

The below training courses are to be completed depending on the requirements and responsibilities of the role.

Training Level: P405

Role Suitability: Industry-standard qualification for those whose work involves asbestos management, such as duty holders, building managers, responsible persons, and those who look after asbestos management data. It provides the background knowledge required to manage identified asbestos in buildings and ensures that appropriate management processes are followed and documented properly. It also gives you the knowledge to make better procurement decisions, and to monitor the quality of the services provided by other asbestos professionals through understanding the standards and procedures that you should be following.

The qualification is suitable for duty holders, or anyone who assists them in the discharge of their responsibilities. It is also suitable for anyone who:

- Manages asbestos in buildings
- Procures asbestos-related services

Training Level: Duty to Manage

Role Suitability: Any persons who requires an overview of the duty to manage and legislative requirements. This would normally include, but is not limited to duty holder's assistants, appointed persons assistants, building owners, landlords, sub-lessors, managing agents etc. and any person assisting duty holders in the compliance with CAR 2012 regulation 4. Anyone who is raising and interpreting asbestos surveys to assist in duty holders' responsibility and enable works/removals.

Training Level: UKATA/IATP Asbestos Awareness/Refresher

Role Suitability: All employees who may disturb asbestos through their work. Those who visit and work within the buildings that are onsite, who have the need to understand an asbestos risk assessment, be able to interpret asbestos surveys and stop works if they find any suspicious materials. Does not cover those that are responsible for building, scope future works, raise or review surveys prior to works, manage removals or onsite teams. Face to Face training required a minimum of every 5 years with online refreshers in between.

Training Level: University Asbestos Awareness (Safety Hub)

Role Suitability: Those who will visit site but do not complete any works on the building structure, scope future works, raise or review surveys, manage removals or onsite teams.

Further training will be provided to all parties on the availability and contents of this document, together with how they can gain access to the information contained within the register.

BOHS courses will be undertaken with a trainer listed on the BOHS website. Asbestos awareness training will be provided by one of the framework consultants. Awareness refresher training is to be undertaken annually as far as reasonably practicable.

9.0 Emergency Procedures

In any emergency the primary concern should always be the immediate safety of staff and the building occupants, followed by those who may have to enter the building because of the emergency and then those who are nearby. Nothing that is contained within this document shall override any instruction or procedure related to building evacuation.

All staff in the University should be aware of the risk from asbestos. Any member of staff or contractor identifying a possible asbestos hazard must contact the Campus Infrastructure Helpdesk on 01225 383232 during working hours or Security out of hours 666 or 01225 383999.

In the event of an accidental and uncontrolled release of asbestos into the workplace emergency procedures to limit exposure and risks to health should be implemented. Such procedures should include means to raise the alarm and procedures for evacuation. These procedures should be tested and practised at regular intervals.

- Availability 24hours per day / 7 days per week
- For emergency incidents: Framework consultants to arrive on site within 2.5 hours during normal working hours (0800-1900) and within 4.5 hours outside normal working hours.

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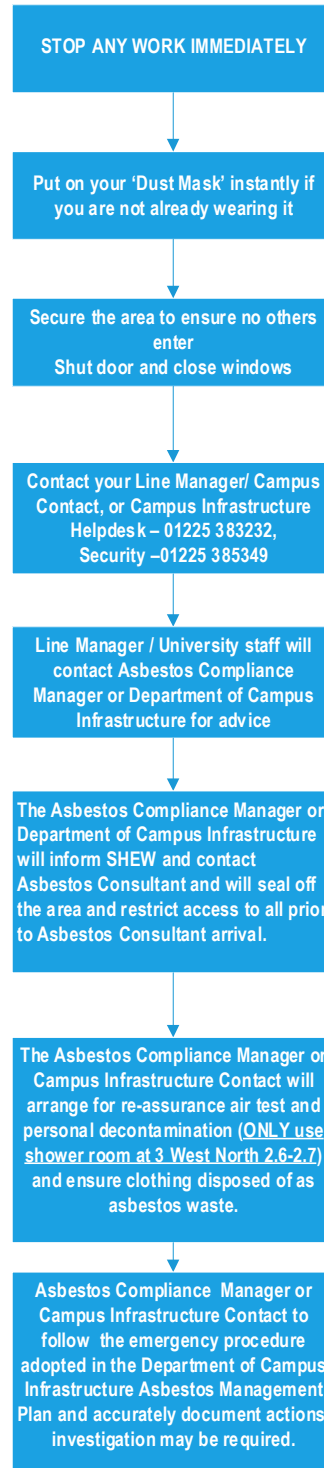
- Where people have been contaminated with visible dust and debris arrangements should be made to decontaminate the people using an 'Asbestos Incident Emergency Response Kit' located in the Campus Infrastructure Department, Rooms 1.06 and 1.13, and Wessex House Security Control Room, Room 1.03A.
- The area in which the hazard exists must be vacated and the area closed off.
- The framework asbestos consultants must be contacted, and details of the suspected asbestos hazard provided. Liaison will be required between the Asbestos Compliance Manager, the Director of Campus Infrastructure, Security and the Deputy Director Safety & Wellbeing Services, Safety, Health and Employee Wellbeing (SHEW).
- The accredited asbestos consultant shall be available 24 hours per day, 7 days per week and able to visit the site within 4 hours, inspect the area, take samples of any suspected asbestos and conduct air tests as appropriate. The samples shall be analysed, and a verbal result given to the Department of Campus Infrastructure within the following 24 hours. A written copy of the report with suitable recommendations will be presented to the Department of Campus Infrastructure within 48 hours of the original request. A copy will be provided to the SHEW office to determine if RIDDOR applies.
- These records should then be kept for a period of least 40 years. The employee should be given a copy of the note with instructions that it should be kept indefinitely.
- A nominated LARC from the approved contractor's list should be contacted and instructed to seal off any contaminated areas that have been identified.
- The asbestos contractor should then produce a suitable method statement and submit it to the HSE if required.
- The asbestos should then be removed under normal asbestos removal procedures.
- The area of contamination cannot be reoccupied until a certificate of reoccupation has been issued by the accredited analyst/surveyor and the enclosure dismantled.

- In the event of a major emergency in a building known to contain significant amount of asbestos Security must be contacted immediately, externally on 01225 383999 and internally on 666 to take appropriate action. **See [Flowchart 5 overleaf](#)**

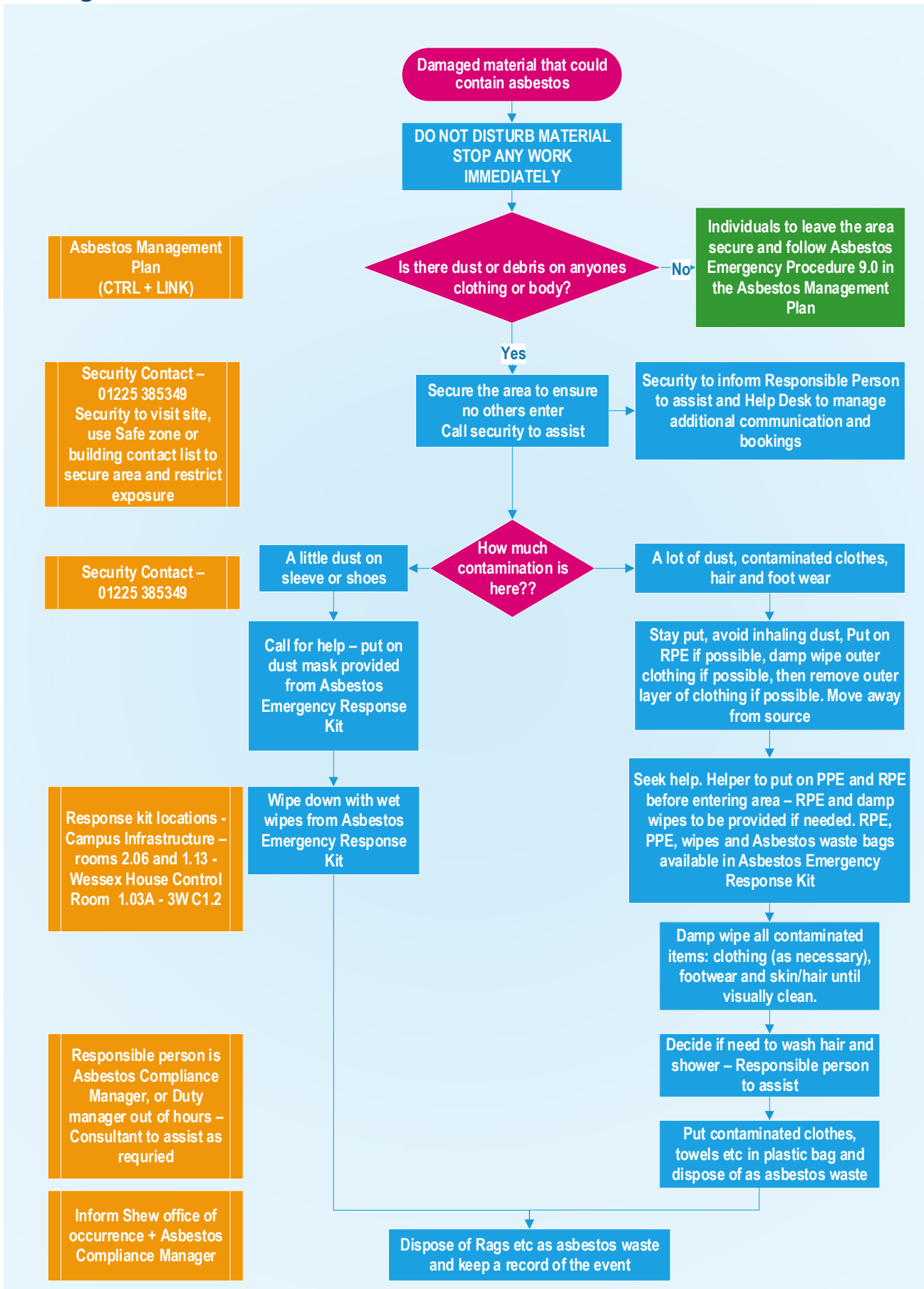
9.1 Asbestos Emergency Procedure (Flowchart 5)

Campus Infrastructure Craft workers and External Contractors

The following steps must take place if you disturb or damage materials that could contain asbestos:



Damaged or discovered materials that could contain asbestos



9.2 Personal Exposure & Minor Incidents

The Department of Campus Infrastructure Asbestos Management Plan states that no member of staff should work directly upon asbestos materials or in an area where airborne fibre levels are likely to exceed the Control Limit. This to include all ceiling voids in buildings constructed prior to January 2000 across the University estate.

Despite the control measures that are in place, it is possible that a University employee or sub-contractor may inadvertently disturb a previously concealed or unrecorded asbestos material.

As soon as it is realised that the material may contain asbestos it is imperative that the emergency procedure steps are taken (see flowchart 5) and the Asbestos Compliance Manager notify the Deputy Director Safety & Wellbeing Services under Section 4 of this Operational Procedure.

9.3 Damaged Materials

Any damage to known or suspected asbestos materials should be reported the Asbestos Compliance Manager or Department of Campus Infrastructure as soon as they are observed. No attempt should be made to clear the affected materials. Reasonable steps should be taken to secure the area and appropriate warning notices posted.

Any suspected damage must be reported to the Department of Campus Infrastructure Helpdesk on 01225 383232. A member of the Campus Infrastructure management team would advise on the actions to be taken.

Outside of working hours it should be reported to Security located in the Library or contacted on 01225 385349 who will contact the On-call Campus Infrastructure Duty Manager who will contact the asbestos framework consultants.

10.0 Asbestos Management Group (AMG)

The Asbestos Management Group (AMG) has been established by the Director of Campus Infrastructure and will oversee the management of asbestos materials within the University estate. It will be composed of core members who should attend most meetings and or be responsible for the development and maintenance of the Asbestos Management System.

The key members of this group are:

The Director of Campus Infrastructure (chair), the Compliance Manager, the Asbestos Compliance Manager and the Deputy Director Safety & Wellbeing Services. Other members of Campus Infrastructure will be asked to attend where relevant. Representatives of each of the asbestos consultants on the University's framework attend each meeting to provide updates on activities that they have undertaken for the University.

Any of the listed parties may invite further members of their own team, or other interested persons, but it should be noted that the purpose of the Management Group is to discuss general management issues relating to asbestos.

The core agenda is as follows:

- Appointments – discuss any changes or communicate related issues.
- Status of Policy & Procedures – approved status, revisions, etc.
- Risk Assessments – status, outstanding priority works and review.
- Risk reduction – remedial works, incidents.
- Implementation & Management – adoption and performance of procedures.
- Records – status of register, retention of paperwork, etc.
- Training – outstanding, advisory and refresher, etc.
- Any other business.

This agenda may be reviewed at any times.

The Asbestos Management Group will meet as required, or in the event of an incident.

The management of asbestos is now a permanent agenda item in the Department of Campus Infrastructure; Health and Safety Meeting which is held quarterly.

Qualified Persons (refer to Appendix B – page 36)

Appendix A

Exemption Form

Exemptions for Asbestos Register Checking

This form is to be used to make a contractor exempt from checking the asbestos register either due to the nature of their normal works or for non-routine work, where the task is confined to specific equipment, or for non-invasive works where no asbestos risks are involved.

Name of Campus Infrastructure contact:

Name of the person(s):

Company:

Location:

Description of work to be carried:

Reason for exemption:

Valid from date:

Valid to date:

Authorised by (Campus Infrastructure Staff Member):

Appendix B

The below mentioned University staff currently holds the BOHS P405 Management of Asbestos in Buildings or Equivalent:

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