

## The University of Sussex Asbestos Management Plan and Policy

### Introduction

This document outlines the overall University approach to the management of asbestos. The University Policy is to comply fully with the Regulations and associated ACOP (see references).

### Responsibility for managing the asbestos risk

The overall accountability rests with Estates and Facilities Management for the management of the asbestos programme, and the Directors and Heads of School for local practices to support the overall plan (especially for ITS who engage contractors to do intrusive works on University buildings). The University of Sussex is the Duty Holder.

The majority of the asbestos management tasks are completed by Sussex Estates and Facilities (SEF) including but not limited to; managing projects, managing the asbestos register and associated surveys; issuing permits to works for their contractors.

### The asbestos register and the schedule for monitoring the condition of ACMs

The asbestos register is hosted via a system called MiCad. This is updated and maintained by SEF. Access and training in its use is provided to all stakeholders who need access and have the appropriate competency to understand the information and its limitations. Information logged on MiCad is based on management surveys e.g. as defined by the HSE: a survey that must locate ACM that could be damaged or disturbed by normal activities, by foreseeable maintenance, or by installing new equipment.

The information is subject to periodic reviews (generally 12 months) and is updated as new information is obtained. For this reason no hard copies should be stored and used, all information must be obtained from the database system.

The register will be maintained for the life of the premises.

### Control of work activities

Only SEF and ITS can carry out work on the fabric of a building. Others will need EFM permission before any works commence. Work plans will include the following controls.

- Contractor Risk Assessments and Method Statements will be reviewed and approved by the Permit Office, or rejected/further information requests made ahead of any works
- The asbestos record/register is to be checked in good time before the work starts.
- Checks will be made that the information on the presence of asbestos has been understood and will be taken into account.
- Checks made that the correct controls will be used and that competent asbestos-trained (and where necessary licenced) contractors will carry out the work.
- Where required a full refurbishment and demolition survey will be completed.
- All works completed by competent staff or sub-contractors, with the appropriate professional accreditations, insurance cover and HSE licence.

### Plans for any necessary work identified from the risk assessment, e.g. repair, protect or remove ACMs

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- Every year the Estates and Facilities budget will contain an allocation for the removal of ACMs indicated as the highest priority for removal.
- Any repairs that are needed will be a priority reactive task to ensure asbestos left in place remains in a safe condition.
- Any projects will review asbestos registers and will remove asbestos as part of the project where required or when where leaving asbestos in place would cause a risk in the future.

### **Communication of the content of the management plan**

The detail of work with asbestos is managed via SEF and their competent supply chain. ITS also engage contractors who impact the building fabric e.g. installation of Wi-Fi hardware and will need to ensure their work is coordinated with EFM and that contractors they engage have access to the asbestos register.

For general building users e.g. schools there is a clear communication on the H&S website requiring all works of this type to be referred to SEF. The website also holds a copy of the asbestos management plan.

### **Contingency arrangements if the main contact person for asbestos risk management is not available**

The University manages asbestos with knowledge and experience available within a number of roles within Health and Safety; Estates and Facilities; ITS and SEF; with access to competent contractors as required.

### **Prioritising ACM actions**

1. Remediation of any damage to existing protection (includes encapsulation and protective surface coatings). Where damage has occurred consideration of reassurance air monitoring will be given. In urgent cases a waiver will be sought, these requests are assessed by HSE and requires their approval before work starts.
2. Removal of high priority areas from the previous surveys, managed in the Long Term Maintenance Committee.
3. Any small scale works or larger projects will include costs for refurbishment and demolition surveys where required, and will have the time to allow for any notifiable work to be notified prior to work commencing.

### **Reference**

Control of Asbestos Regulations 2012. Approved Code of Practice and guidance  
<https://www.hse.gov.uk/pubns/priced/l143.pdf> Accessed 19/11/2020

### **Summary**

The asbestos management plan details the University's approach to ensure that:

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- There is compliance with the requirements of the Regulations<sup>1</sup>.
- Information in the asbestos record/register is kept up to date and maintained.
- Information in the asbestos record/register known and understood by the workers who are doing the work on site and easily accessible for anyone who needs to inspect it.
- Remaining asbestos is managed in line with the University priorities, and where removed, this is completed by competent contractors in line with the regulatory requirements.

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<sup>1</sup> Control of Asbestos Regulations 2012

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## Appendix 1 Requirement for the Asbestos Management Plan (extract form HSE guidance to the Regulations)

A written (electronic or paper) management plan should be prepared.

The management plan should set out how the risks identified from asbestos will be managed. Details should include:

- Identifying the person(s) responsible for managing the asbestos risk;
- A copy of the asbestos record or register and how to access it if it is kept electronically;
- Instructions that any work on the fabric of the building cannot start without the relevant parts of the record/register being checked. The plan should include details for how this will be achieved. In particular, the plan should identify the procedures and arrangements to make sure:
  - The record/register is checked in good time before the work starts;
  - Checks will be made that the information on the presence of asbestos has been understood and will be taken into account;
  - Checks will be made that the correct controls will be used and that competent asbestos-trained contractors will carry out the work;
- Plans for any necessary work identified from the risk assessment, e.g. repair, protect or remove ACMs;
- The schedule for monitoring the condition of any ACMs;
- How to communicate the content of the management plan;
- Contingency arrangements if the main contact person for asbestos risk management is not available.

### Ensuring the management plan is implemented

The duty holder should ensure that the plan is implemented to manage the risks. The action plan should:

- Prioritise the actions identified;
- Give high priority to damaged material and materials likely to be disturbed; these will need to be repaired, sealed, enclosed protectively or removed using trained and competent personnel.

If unsure how to implement the management plan themselves, the duty holder should seek competent specialist advice from an asbestos surveyor, a laboratory or a licensed contractor, or other competent person as appropriate.

The plan should include procedures and responsibilities to ensure that the asbestos register is shared with any worker/contractor carrying out maintenance or other work.

The asbestos register, including drawings, should be available on site for the entire life of the premises and should be kept up to date.

Work should only start once the duty holder is satisfied that the information in the asbestos record/register is known and understood by the workers who are doing the work on site and easily accessible for anyone who needs to inspect it.

<https://www.hse.gov.uk/pubns/priced/l143.pdf> p37

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