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1 INTRODUCTION

This document is the Manchester Metropolitan University’s (the University) Asbestos Management Plan (AMP) that sets out the procedures and processes in place to manage the risks from Asbestos Containing Materials (ACMs) across the estate.

The University is located in Manchester. The age of some buildings owned by the University are such that asbestos was either employed routinely during their initial construction or was installed during subsequent refurbishment or maintenance works. In addition, a number of the facilities operated by the Manchester Metropolitan University are such that equipment present, and in use, may have asbestos within the structure or component parts.

Asbestos is a term used for the fibrous forms of six naturally occurring silicate minerals which have historically been exploited for their useful properties which include flexibility, high tensile strength, incombustibility, insulation and resistance to chemical attack.

Asbestos was typically added to a range of products to increase their performance or durability. However many products contain asbestos incidentally due to its prevalence, low cost and due to its historical popularity. These products have been widely used in the UK and within buildings at the University. Asbestos use in the UK was not prohibited until 1999, therefore any buildings constructed or equipment produced before this time must be considered by this plan.

The presence of ACMs does not in itself represent danger. However, it does represent a potential risk that needs to be managed appropriately. Where ACMs are disturbed, have become damaged or have deteriorated, the asbestos fibres contained within can become free and potentially airborne, this in turn could result in exposure. Exposure to asbestos, particularly significant or prolonged exposure, can lead to a number of serious health conditions including asbestosis, lung cancer and mesothelioma, all of which are likely to be fatal.

This document replaces all previous Asbestos Management Plans held by the University.

A full list of the individual buildings which constitute the University estate can be found within Appendix I. This table details the date of construction, whether asbestos management surveys have been undertaken and whether there are any ACMs which have been identified within.

Where the University leases properties, or spaces within properties, the requirements of Control of Asbestos Regulations (CAR) 2012 must also be considered. The full duty holder requirements, and this Asbestos Management Plan, will also apply to:

- Any property leased which specifically details that the University are responsible for asbestos management.
- Any property leased where the University have repair/maintenance covenants where asbestos is not specifically mentioned.
Where the University leases properties, or spaces within properties where they are not specifically responsible for asbestos management or maintenance, some asbestos considerations will still be required. In these instances, the University will request details regarding the asbestos management of any properties they lease; these will be reviewed by the Asbestos Team. Where there is insufficient evidence of appropriate asbestos management the University will request that this is provided or will undertake their own assessments as per the contents of this plan.

Asbestos Team Contact Details

Principal Asbestos Safety Manager
Tony Reilly
T.Reilly@mmu.ac.uk
0161 247 1218
0782 731 2252

2 AIMS

CAR 2012, specifically Regulation 4 - The duty to manage asbestos in non-domestic premises, identifies the requirement for a written plan which must detail the nature of the risks identified, and what is in place to ensure their management.

The aim of this plan is to detail how the University will meet the requirements of CAR 2012 and how exposure to asbestos will be prevented, or reduced to the lowest levels practicable.

2.1 Asbestos Policy Statement

In accordance with Manchester Metropolitan University Health and Safety Policy, the Vice-Chancellor and Board of Governors are committed to achieving high standards of health and safety through the effective management of risk. In order to protect against exposure to asbestos containing materials (ACMs) appropriate control measures have been put in place and are detailed below. The policy requires anyone involved with the control of ACMs to fully understand their responsibilities and adhere to this Policy and Management Plan.

The Manchester Metropolitan University recognises its responsibilities and duties under the Control of Asbestos Regulations (2012), referred hereafter as CAR 2012, and shall take appropriate action to protect the health and safety of students, staff, contractors and others by effectively managing the risks associated with ACMs identified in the University building stock.

The Directorate of Estates, Facilities and Capital Development is responsible for the management of all University properties. As part of this, they shall manage the risks from ACMs within University buildings during day-to-day use, operational maintenance and during alteration or refurbishment programmes. This duty of care will be extended to any facility, building or area which the University leases, rents or uses beyond the recognised University building stock.

Specifically Regulation 4 of CAR 2012 places a duty on the University to manage its asbestos through the production and implementation of an Asbestos Management Plan. The aim of the Asbestos Management Plan is to comply with the duty to manage asbestos in non-domestic premises.

Manchester Metropolitan University accepts that it is the legal “Duty Holder” and has an Asbestos Management Plan to comply with its legal obligations.
2.2 The University Policy on Asbestos Management

It is the policy of Manchester Metropolitan University to:

- Comply with all relevant health and safety legislation and guidance.
- Prevent - so far as is reasonably practicable - the exposure of staff, students and other to the health risks associated with asbestos.
- Appoint suitably qualified and competent persons to undertake the roles as defined in the guidance document Health & Safety Executive Guidance Document HSG 264 ‘Asbestos ‘The survey guide’
- Provide adequate financial and physical resources to implement and maintain the Asbestos Management Plan.
- Identify and record the presence of ACMs within all University property so far as is reasonably practicable and to make assessments of the condition and the risk posed by these items.
- Maintain an up to date electronic asbestos register which is available to all who require it.
- Maintain identified ACMs or alternatively restrict access or undertake asbestos abatement.
- Remove asbestos from its buildings during refurbishment programmes and where the risk cannot be appropriately managed.
- Make information and guidance, regarding asbestos management, available to all employees who require it.
- Employ only competent persons and suitable organisations to undertake asbestos related work at the University.
- Review the Asbestos Management Plan as a minimum every 12 months but also following statutory or legislative changes.
- Promote a positive asbestos culture at the University.

2.3 Legislative Framework and Guidance

This Asbestos Management Plan has been created to specifically address the requirements set out in the CAR 2012. This is the sole piece of legislation relating to asbestos in the UK. CAR 2012 sits beneath the over-arching requirements detailed within the Health and Safety at Work Act 1974 (HSWA) and the Management of Health and Safety at Work Regulations 1999 (MHSWR).

The HSWA outlines the duty of care that both employers and employees must have for the health and safety of themselves and others while at work. The MHSWR outline the requirement to undertake risk assessments and defines the principles of prevention to help manage risk. Also stipulated is the need for appropriate training and the requirement to appoint competent persons. The asbestos specific applications of these fundamental principles are detailed within CAR 2012 and are considered within this plan.

CAR 2012 sets out the legal duties but practical advice and guidance on how to achieve this are provided within the Approved Code of Practice L143 Managing and working with asbestos and Health and Safety Executive (HSE) guidance documents. These documents, and specifically HSG 227 A Comprehensive Guide to Managing Asbestos in Premises, have been instrumental in informing the content and processes detailed within this plan.

The University expect, and will endeavour to ensure as far as is reasonably practical, that it, and the contractors that it employs, will comply with the following HSE guidance documents:

- HSG 247 Asbestos: The Licensed Contractors’ Guide
- HSG 264 Asbestos: The Survey Guide
The Construction (Design and Management) Regulations (CDM) 2015 must also be considered by this plan; with regard to its general principles and specific requirements regarding asbestos. These regulations apply to all construction projects. Those that last over 30 days, have over 20 workers or consist of over 500 ‘man days’ must be notified. Asbestos abatement projects must also be considered under CDM.

The general principles of prevention are reiterated within CDM and priority must be given to avoiding risks within construction projects where this is reasonably practicable. Within the context of asbestos and this plan, this will typically require asbestos removal prior to commencement of other works. Where removal is not possible/practical consideration must be given to reducing the risk through abatement works (eg encapsulation), adapting work and/or methodology and providing appropriate information and instruction to workers.

Both the University and the Principal Designer must consider asbestos throughout the duration of any construction project, this will include:
- Provide asbestos information prior to commencement.
- Ensure that asbestos is considered within pre-construction plans and construction phase plans.
- Allow sufficient resources, including time, for asbestos to be considered.
- Ensure asbestos information is updated and kept within the project health and safety file.

Asbestos information required within the health and safety file must be forwarded to the University’s Asbestos team upon completion of the project. This information will include:
- Asbestos survey reports
- Project asbestos management plans
- Details of asbestos removal and management
- Details regarding asbestos communication
- Asbestos registers – both removed and remaining items
- Completion packs – certificates of reoccupation, statements of cleanliness, waste consignment notes

2.4 Asbestos Groups/Meetings

Asbestos Safety Group
The Asbestos Safety group will meet on a quarterly basis and will be attended by representatives from the Asbestos team, Health & Safety, Estates, Projects, Facilities, ISDS and Campus Support. This meeting will be used to discuss the operational asbestos requirements of the University and day to day consideration. The group will report to the EFCD Operational Health and Safety Committee.

Asbestos Removal Contractor Meetings
Asbestos removal contractors will be required to attend monthly contract meetings and quarterly KPI meetings with the Asbestos team. These meetings will be used to discuss the level of service provided against the University requirements, current work being undertaken, audits and quality reviews.

Asbestos Consultants Meetings
Asbestos consultants will be required to attend monthly contract meetings and quarterly key performance indicator (KPI) meetings with the Asbestos team. These meetings will be used to discuss the level of service provided against the University requirements, current work being undertaken, audits and quality reviews.
3 ACTION PLAN AND PRIORITISATION

Asbestos management is an ongoing process which involves a variety of both routine scheduled tasks and reactive activities. Within a large and complex organisation there may be many factors which require consideration and finite resources to action them. Therefore, it is essential that an action plan with priorities and indicative timescales is prepared. The following has been prepared in line with the HSE guidance document HSG227.

Areas/items, which are deemed as having a higher risk potential (in terms of persons or operational impact) will be given priority. Timescales will be based upon available resource and will take into account external factors which may influence them.

Asbestos management is a continuous process that requires continuous adaptation and improvement. Review of this action table, and whether the actions have been met within the allocated timescales, will help inform any updates or changes to management process and this document.

The table below highlights the proposed actions, priorities and timelines at the time of issue of the Asbestos Management Plan. A live and more detailed version of this action plan is managed by the Asbestos Team and is located within the Asbestos Safety Management folder on the Estates R Drive. This will be updated as progress is made and/or when other actions are identified.

<table>
<thead>
<tr>
<th>Action</th>
<th>Details</th>
<th>Priority</th>
<th>Projected Date for Completion</th>
</tr>
</thead>
<tbody>
<tr>
<td>Review re-tender requirements for asbestos removal framework</td>
<td>End of 3 year contract at end of 2022 - Re-tender in agreement with Procurement</td>
<td>High</td>
<td>Mar-22</td>
</tr>
<tr>
<td>Review re-tender requirements for asbestos consultants framework</td>
<td>End of +1 extension at the end of 2022 - Re-tender in agreement with procurement</td>
<td>High</td>
<td>Oct-22</td>
</tr>
<tr>
<td>Undertake asbestos abatement works identified in management &amp; Reinspection surveys</td>
<td>Specifications have been prepared for the majority of work identified</td>
<td>High</td>
<td>Ongoing as required</td>
</tr>
<tr>
<td>Undertake re-inspections of asbestos data in Planon</td>
<td>To commence at 12 monthly intervals unless recommended earlier</td>
<td>High</td>
<td>Jul-22</td>
</tr>
<tr>
<td>Provide training on the use of Planon asbestos module to new starters as required</td>
<td>Training will be required for MMU employees on how to use the asbestos module and app within Planon</td>
<td>High</td>
<td>Ongoing as required</td>
</tr>
<tr>
<td>Undertake asbestos duty holder training</td>
<td>Course and scheduling in development.</td>
<td>High</td>
<td>Dec-22</td>
</tr>
<tr>
<td>Review / update management plan</td>
<td>Annual review of AMP</td>
<td>Medium</td>
<td>Jan-22</td>
</tr>
<tr>
<td>Develop and undertake refresher training</td>
<td>To be completed for all employees who had asbestos training last year - on-line or face to face dependant on covid advice at time.</td>
<td>Medium</td>
<td>Jun-22</td>
</tr>
<tr>
<td>Activity</td>
<td>Description</td>
<td>Priority</td>
<td>Date</td>
</tr>
<tr>
<td>------------------------------------------------------------------------</td>
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</tr>
<tr>
<td>Develop and undertake asbestos awareness training</td>
<td>On-line training or face to face training for new starters to the University since previous Awareness training</td>
<td>Medium</td>
<td>Jun-22</td>
</tr>
<tr>
<td>Create online asbestos induction training for new employees</td>
<td>Existing training to be updated and developed into a Moodle session</td>
<td>Medium</td>
<td>May-22</td>
</tr>
<tr>
<td>Undertake asbestos light training sessions</td>
<td>Undertake asbestos light sessions for domestic and security employees as required</td>
<td>Medium</td>
<td>Dec-22</td>
</tr>
<tr>
<td>Audit AMP</td>
<td>In planning</td>
<td>Medium</td>
<td>Ongoing on a monthly basis as per schedule in section 13</td>
</tr>
<tr>
<td>Review survey / inspection requirements at Ryebank fields</td>
<td>Monthly inspections scheduled until Dec-22 unless University sells land sooner.</td>
<td>Medium</td>
<td>Dec-22</td>
</tr>
<tr>
<td>Digitise asbestos audit forms</td>
<td>Develop and implement the use of Planon along with ISDS</td>
<td>Low</td>
<td>Sep-22</td>
</tr>
<tr>
<td>Audit asbestos service providers</td>
<td>Ongoing</td>
<td>Low</td>
<td>Ongoing as per the requirements in section 13</td>
</tr>
<tr>
<td>Re-organise historical asbestos filing to rationalise</td>
<td>All filing has been centralised in one location, further work required to re-name and organise</td>
<td>Low</td>
<td>Aug-22</td>
</tr>
</tbody>
</table>
4 ORGANISATIONAL STRUCTURE

Manchester Metropolitan University is a large and complex organisation with over 4000 employees located within a multitude of departments and schools. In addition, the University typically supports over 35,000 students. Details of the overall University Professional Services structure can be found within the organograms in Appendix II.

All persons who work at, or may be present within University property, have responsibilities under this plan. The nature and extent of these responsibilities will be directly proportional to, and inline with, the nature of their roles and the work that they undertake.

The majority of ACMs within the University estate are associated with the building structure and estates infrastructure. Therefore, the majority of this section, and the following section 5.0 Roles and Responsibilities, will primarily address those parts of the organisation with employees who undertake, instruct or manage work on the fabric of the building. These are the areas where the risk potential is most significant.

The following have been deemed as requiring specific consideration as they have departments or employees that are most likely to come across, or have to consider asbestos, through the course of their work:

- Those with legal responsibilities under CAR 2012 including the Duty Holder and Responsible Person
- Estates Maintenance
- Revenue Projects
- Capital Projects
- Facilities
- Information Systems and Digital Services (ISDS)
- Technical Services

Organograms highlighting the specific areas/roles, which require asbestos consideration, have been provided within Appendix II. Separate organograms are available for Estates, Facilities and Capital Development and ISDS.

Further details regarding the University, including departmental information, campuses, buildings, contact information etc can be found at the following link: mmu.ac.uk
The following figure identifies the asbestos management structure at the University including key roles, departments and a summary of their respective responsibilities:

**Asbestos Management Structure**

**Key**
- Information
- Governance and Management
- NATURE OF RESPONSIBILITY

**Operational**
- FACILITIES MAINTENANCE
- EXTERNAL CONTRACTORS
  
  Have necessary knowledge, training, experience and abilities to carry out operational and maintenance tasks.

**Managers/PMs**
- CAPITAL ESTATES PROJECTS
- MAINTENANCE MANAGERS
- ISOS MANAGERS
- EXTERNAL CONSULTANTS
  
  Have necessary knowledge, training, experience and abilities to carry out operational and maintenance tasks.

**Specialist Providers**
- LARCS
- ASBESTOS CONSULTANTS
- SENIOR TECHNICAL AUTHORITIES
- AUTHORISING ENGINEERS
  
  Have necessary knowledge, training, experience and abilities to carry out operational and maintenance tasks.
5 ROLES AND RESPONSIBILITIES

This section identifies those who have responsibilities under this Asbestos Management Plan and what those responsibilities are. This section has been split into two parts; roles with defined asbestos responsibilities, and those with more general responsibilities to be considered throughout the course of their work.

The University understands the importance of asbestos management and has an Asbestos Team dedicated to supporting the AMP and the persons and processes detailed within. The Asbestos Team consists of the Principal Asbestos Safety Manager and the Deputy Principal Asbestos Safety Manager.

5.1 Roles with Defined Asbestos Responsibilities

<table>
<thead>
<tr>
<th>Role</th>
<th>Responsibilities</th>
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</thead>
</table>
| Manchester Metropolitan University Board of Governors Duty Holder | • The Board of Governors is responsible for determining the educational character and mission of the University, for oversight of its activities and for the efficient use of resources.  
  • The Board of Governors, as the employer, has the ultimate responsibility for health and safety and is the Duty Holder for University.  
  The Board of Governors has delegated the duty of the day-to-day running of the University to the Vice-Chancellor. |
| Vice-Chancellor Duty Holder                | • The Vice-Chancellor (VC) is responsible to the Board of Governors for the day-to-day running of the University.  
  • The Vice-Chancellor has delegated authority as the head of the institution, for the academic, corporate, financial, estate and human resource management of the institution.  
  • Constitute a University Health and Safety Committee (UHSC) to plan and implement a health and safety policy and the executive arrangements therein, which includes the management of asbestos policy.  
  • Support asbestos training and development for all who may require it within the organization. |
| Chief Operating Officer Governance        | • The Chief Operating Officer (COO), in the absence of the Vice-Chancellor, has delegated authority for the Vice-Chancellor’s duties in the University’s non-academic activities.  
  • Support asbestos training and development for all who may require it within the organisation. |
| University Health & Safety Committee Governance | • The University Health and Safety Committee (UHSC) is responsible to the VC and COO for the planning, consultation and dissemination of the arrangements made within the University Health and Safety Plan, including the Management of Asbestos Policy and Asbestos Management Plan. |
### Role Responsibilities

<table>
<thead>
<tr>
<th>Role</th>
<th>Responsibilities</th>
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</thead>
</table>
| Director of Estates, Facilities and Capital Development Governance | • Is responsible for the strategy and allocation (within the limits of the approved budget) of financial and other resources for the control of ACMs at the University.  
• Ensure, so far as is reasonably practicable that adequate resources are provided to enable compliance with the Asbestos Management Plan.  
• To ensure suitably qualified and competent persons are appointed to discharge the responsibilities within the AMP.  
• To ensure, so far as is reasonably practicable, the appointment of a suitably qualified and competent senior technical authority to audit and provide external assurance of asbestos management at the University.  
• Support asbestos training and development for all who may require it within EFCD.  
• Support the development and implementation of robust procedures to manage asbestos and control work on the University estate. |

The Director of EFCD through the EFCD Health, Safety & Compliance Manager shall ensure, so far as is reasonably practicable appropriate resources and expertise is in place for asbestos management in accordance with the University’s Asbestos Management Policy and Asbestos Management Plan.
<table>
<thead>
<tr>
<th>Role</th>
<th>Responsibilities</th>
</tr>
</thead>
</table>
| EFCD Health, Safety & Compliance Manager                  | • Lead responsibility for the asbestos safety management function.  
• Formally appoint a competent Principal Asbestos Safety Manager (PASM), the responsible person.  
• Manage the PASM as the competent person for the day-to-day management of ACM.  
• Ensure, so far as is reasonably practicable that the PASM is aware of their role and responsibilities and that they are competent to discharge them in entirety.  
• Ensure, so far as is reasonably practicable that the implemented AMP is monitored so that working arrangements and provision of financial, technical, human and other resources are suitable and sufficient to meet its requirements.  
• Ensure, so far as is reasonably practicable that adequate (financial and human) resources are understood and requested to enable compliance with the Asbestos Management Plan.  
• In consultation with the PASM appoint other resources for the day-to-day management of asbestos. These will include:  
  ▪ An asbestos consultant  
  ▪ A Licensed Asbestos Removal Contractor (LARC)  
  ▪ Formally appoint a suitably qualified and competent senior technical authority to audit and provide external assurance of asbestos management at the University.  
  ▪ Commission periodic external assurance audits.  
  ▪ Formerly instruct the periodic review of the AMP as required. |
<table>
<thead>
<tr>
<th>Role</th>
<th>Responsibilities</th>
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<tbody>
<tr>
<td><strong>Principal Asbestos Safety Manager</strong></td>
<td>• Designated responsible person for asbestos.</td>
</tr>
<tr>
<td><strong>Responsible Person</strong></td>
<td>• Maintain, audit and update the Asbestos Management Plan and Policy.</td>
</tr>
<tr>
<td><strong>Operational and Management</strong></td>
<td>• Manage and maintain the asbestos register including instructing statutory surveys and re-inspections.</td>
</tr>
<tr>
<td><strong>Asbestos team</strong></td>
<td>• Ensure so far as is reasonably practicable that appropriate management actions are in place for all ACMs.</td>
</tr>
<tr>
<td></td>
<td>• Identify and develop asbestos abatement strategies where management is not appropriate.</td>
</tr>
<tr>
<td></td>
<td>• Inform relevant persons within Estates, Facilities and Capital Development of any dangerous conditions.</td>
</tr>
<tr>
<td></td>
<td>• Provide a quarterly report to the Director of Estates, Facilities and Capital Development.</td>
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<tr>
<td></td>
<td>• Investigate and report on any asbestos incidents and emergencies.</td>
</tr>
<tr>
<td></td>
<td>• Manage and assess suitability of asbestos consultants and their work.</td>
</tr>
<tr>
<td></td>
<td>• Manage and assess suitability of asbestos contractors and their work.</td>
</tr>
<tr>
<td></td>
<td>• Identify needs and develop content of asbestos training for University employees.</td>
</tr>
<tr>
<td></td>
<td>• Undertake asbestos training/tool box talks.</td>
</tr>
<tr>
<td></td>
<td>• Provide technical asbestos support for all University employees and projects.</td>
</tr>
<tr>
<td></td>
<td>• Maintain professional competence and keep up to date with industry and legislative changes.</td>
</tr>
<tr>
<td></td>
<td>• Promote a positive asbestos culture.</td>
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</table>

<table>
<thead>
<tr>
<th>Role</th>
<th>Responsibilities</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Deputy Principal Asbestos Safety Manager</strong></td>
<td>• Assist the Principal Asbestos Safety Manager in their duties.</td>
</tr>
<tr>
<td><strong>Competent Person</strong></td>
<td>• Manage and maintain the asbestos register.</td>
</tr>
<tr>
<td><strong>Operational</strong></td>
<td>• Undertake technical/quality audits on the work undertaken by asbestos consultants.</td>
</tr>
<tr>
<td><strong>Asbestos team</strong></td>
<td>• Provide asbestos information and advice to maintenance and estates and facilities projects.</td>
</tr>
<tr>
<td></td>
<td>• Undertake site inspections to assess suitability of asbestos information.</td>
</tr>
<tr>
<td></td>
<td>• Undertake inspection/re-inspection of ACMs throughout the estate.</td>
</tr>
<tr>
<td></td>
<td>• Provide technical asbestos support for all the University employees and projects.</td>
</tr>
<tr>
<td></td>
<td>• Maintain professional competence and keep up to date with industry and legislative changes.</td>
</tr>
<tr>
<td></td>
<td>• Promote a positive asbestos culture.</td>
</tr>
<tr>
<td></td>
<td>• To deputise for the Principal Asbestos Safety Manager in their absence.</td>
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</tbody>
</table>
## 5.2 Roles with General Asbestos Responsibilities

<table>
<thead>
<tr>
<th>Role</th>
<th>Responsibilities</th>
</tr>
</thead>
</table>
| **Director of Human Resources and Assistant HR Director - Interim Head of Health & Safety** | • Overall responsibility for health and safety throughout the University.  
• Work collaboratively with the Asbestos team.  
• Provide technical support and guidance regarding wider Health and Safety considerations associated with asbestos.  
• Coordinate with and support the Asbestos team during investigations and reporting.  
• Audit and inspect asbestos management arrangements.  
• Promote a positive asbestos culture. |
| **Heads of Faculty, School, or Service** | • Cooperate with the Asbestos team to help facilitate access and arrangements for any statutory asbestos surveys, inspections or abatement work which may be required within their demise.  
• Ensure that the activities/work within their areas which could potentially disturb asbestos (work on the building fabric or services) are undertaken through EFCD or are undertaken as per the requirements of the AMP.  
• Identify and inform the Asbestos team of any employees whose work may involve disturbing the fabric of the building or services within so that provision for training can be made.  
• Report any suspect materials, building damage or unsafe working to the Asbestos team.  
• Consider the potential for asbestos within departmental equipment (in use and during acquisition and disposal) and liaise with the Asbestos team for support. |
| **EFCD Assistant Directors** | • Cooperate with the Asbestos team to help ensure compliance within their respective departments.  
• Ensure that the activities/work within their areas which could potentially disturb asbestos (work on the building fabric or services) are planned and undertaken as per the requirements of the AMP.  
• Identify and inform the Asbestos team of any employees whose work may involve disturbing the fabric of the building or services within so that provision for training can be made.  
• Help promote a positive asbestos culture. |
<table>
<thead>
<tr>
<th>Role</th>
<th>Responsibilities</th>
</tr>
</thead>
</table>
| Estates/Facilities/ISDS/Technical Services Managers                  | • Have a working knowledge of the AMP and responsibilities defined within.  
• Undertake work inline with the requirements of the AMP  
• Review and interpret asbestos information prior to allocating or commissioning work.  
• Where appropriate seek additional asbestos advice or investigations through the Asbestos team or external asbestos consultants.  
• Provide asbestos information to those undertaking work.  
• Attend and engage with asbestos training provided.  
• Inform Asbestos team of new positions/persons within their teams who may require asbestos training. |
| Project Managers                                                     | • Have a working knowledge of the AMP and responsibilities defined within.  
• Undertake work inline with the requirements of the AMP  
• Engage with Asbestos team during planned refurbishment and development work.  
• Review existing asbestos information and where appropriate instruct asbestos consultants to undertake additional surveys.  
• Provide asbestos information to those undertaking work.  
• Where asbestos abatement works are necessary instruct asbestos consultants to prepare a specification for abatement.  
• Where necessary instruct LARCs to undertake asbestos abatement and asbestos consultants to undertake analytical monitoring.  
• Collate and provide handover information to the Asbestos team following any asbestos works, including updating the asbestos register.  
• Attend and engage with asbestos training provided. |
| Estates/Facilities/ISDS/Technical Services Supervisors and Maintenance Officers | • Review and interpret asbestos information prior to allocating work.  
• Provide asbestos information to those undertaking work.  
• Where appropriate seek additional asbestos advice or investigations through the Asbestos team or external asbestos consultants.  
• Where necessary instruct LARCs to undertake abatement work.  
• Attend and engage with asbestos training provided.  
• Inform Asbestos team of new positions/persons within their teams who may require asbestos training. |
| Estates/Facilities/Technical Services and Operational Employees       | • Review asbestos information and heed asbestos advice provided  
• If asbestos information is not provided, request it.  
• Undertake all work inline with agreed scope and current risk assessments.  
• Escalate asbestos concerns to manager and/or Asbestos team.  
• Attend and engage with asbestos training provided. |
### Role Responsibilities

<table>
<thead>
<tr>
<th>Role</th>
<th>Responsibilities</th>
</tr>
</thead>
</table>
| Employees                                 | • Undertake all work inline with job descriptions, training, methodology and risk assessments.  
  • Report any suspect materials, building damage or unsafe working to the Asbestos team. |
| Students                                  | • Avoid damaging or disturbing the fabric of the building.                        
  • Report any damage and defects through the official University channels.          |
| External Contractors/Consultants          | • Comply with the AMP responsibilities detailed above if undertaking any of these roles on behalf of the University.  
  • Review asbestos information and heed asbestos advice provided.  
  • If asbestos information is not provided, request it.  
  • Undertake all work inline with agreed scope, current risk assessments and permits in place.  
  • Not undertake any work on asbestos products unless approved by the Asbestos team.  
  • Escalate asbestos concerns to instructing manager and/or Asbestos team.  
  • Have valid asbestos training commensurate with their role.  
  • Make suitable provisions to ensure the above is undertaken by any sub-contractors in their employ. |

### 6 TRAINING

The University recognises its responsibilities under Regulation 10 - Information, Instruction and Training of CAR 2012. The University will provide role specific asbestos training to all employees who are potentially liable to disturb ACMs and to those who supervise, manage or instruct them.

To ensure that the training provided is appropriate to the role and responsibilities of the employees, a number of training types are available. The target audiences and a summary of the training content and duration is provided for each.

#### 6.1 Asbestos Team Training Requirements

**Principal Asbestos Safety Manager**

The Principal Asbestos Safety Manager (PASM) must hold the following qualifications:

- CCP/CoCA or working towards
- BOHS P407 Managing Asbestos in Premises - The Duty Holder Requirements
- Fit2fit Train the Tester – Qualitative Method

**Deputy Principal Asbestos Safety Manager**

The following qualifications are required but development should include working towards those detailed for the PASM above:

- BOHS P402 Surveying and Sampling Strategies for Asbestos in Buildings
- BOHS P403 Asbestos Fibre Counting (PCM)
- BOHS P404 Air Sampling of Asbestos and MMMF and Requirements for a Certificates of Reoccupation
- BOHS P405 Management of Asbestos in Buildings
### 6.2 Standard University Employee Training

<table>
<thead>
<tr>
<th>Training Type</th>
<th>Who For?</th>
<th>Specific Content</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Asbestos Light</strong></td>
<td>Those whose work may bring them into contact with asbestos incidentally and first responders. For example: domestic and security staff</td>
<td>• Brief content on properties and uses of asbestos • The health effects • Typical asbestos applications at the University • Identifying and escalating issues • The University Asbestos team contact information</td>
</tr>
<tr>
<td><strong>Asbestos Awareness – Operational</strong></td>
<td>Those who work on the fabric of the building and services within. For example: Estates Operatives and Technicians, Facilities Assistants, School Technicians, ISDS</td>
<td>• The properties of asbestos • The health effects including the effect of smoking • Typical asbestos products and their applications • Typical ACMs at the University • Asbestos surveys and registers • Emergency procedures • Process for obtaining asbestos information at the University • Operational staff responsibilities and responsibilities of their managers • The University Asbestos team contact information</td>
</tr>
<tr>
<td><strong>Asbestos Awareness – Managers</strong></td>
<td>Those who manage or supervise those who undertake work of the fabric of the building and services within. Including those who instruct work from external providers. For example: Maintenance Managers, Estates Managers, Facilities Managers, Project Managers, Catering Managers</td>
<td>• The properties of asbestos • The health effects including the effect of smoking • Typical asbestos products and their applications • Typical ACMs at the University • Asbestos surveys and registers • Emergency procedures • Process for obtaining asbestos information at the University • Interpreting asbestos information • Process for asbestos within projects • Instructing surveys, specification production and asbestos abatement • Providing operatives and contractors with asbestos information • The University Asbestos team contact information</td>
</tr>
<tr>
<td><strong>Asbestos Duty Holder</strong></td>
<td>Those who have senior management responsibilities and specific duties under this Management Plan. For example: Directors, Assistant Directors, Senior Health and Safety representatives, Chief Operating Officer, Vice-Chancellor</td>
<td>• Legislative framework • Duty Holder requirements • Key concepts of asbestos management • Designated persons and responsibilities • The University Asbestos Policy and Management Plan</td>
</tr>
</tbody>
</table>
6.3 Induction Training

Induction training will be provided to those who are identified as requiring asbestos training in section 6.2. Induction sessions are provided by the Asbestos team by arrangement. This training provides a brief overview of key information whilst full training is being planned.

Development is underway to provide induction training via Moodle.

This training will include some of the basics from asbestos awareness but will centre on the processes, information and support in place at the University.

6.4 Refresher Requirements/TNA/Toolbox Talks/Internal Communication

Refresher training for all asbestos trained University employees will be undertaken on an annual basis. The content of refresher training will be formulated based upon Training Needs Analysis (TNA), which will be undertaken by the Asbestos team with the relevant managers. The external training provider may also undertake training needs questioning at the start of refresher sessions.

The Asbestos team will also provide bespoke training content based upon any changes to the University structure and procedures, legislative changes, progress regarding asbestos abatement/restrictions and information and lessons learnt following any incidents which may have occurred in the previous 12 months.

Where the need is deemed urgent, the Asbestos team may undertake toolbox talks to specific groups as and when these are required.

6.5 Additional Role Specific Training

Due to the nature and location of some ACMs across the University estate there is the need for additional training and provision of asbestos specific Respiratory Protective Equipment (RPE) and Personal Protective Equipment (PPE). Where risk assessments have identified that additional controls may be required the following will be undertaken.

**Face Fit Testing – Test the Tester**

A selection of employees within Estates are trained to undertake qualitative face fit testing. An external training provider accredited by the British Safety Industry Federation (BSIF) Fit2Fit scheme undertakes this training.

Training Needs Analysis (TNA) will be undertaken annually by the Asbestos team to assess if further training/updates are required.

**Face Fit Testing**

The University have suitably trained personnel and the equipment to undertake qualitative face fit testing in house. This will be undertaken for all employees who need to access areas or undertake work where the risk assessment has identified the need for asbestos RPE. Asbestos RPE will be FFP3 and disposable. Each mask is for single use only. The University’s Asbestos team must be consulted prior to arranging face fit testing for asbestos reasons.

Face fit testing will be repeated, as a minimum, on an annual basis. Re-testing will also be done upon new mask types being issued, when wearers have significant weight change or when changes to the face or significant dental work has been undertaken. Testing will only be undertaken on individuals who are clean shaven or without facial hair.

**Donning and Doffing**

The Asbestos team will undertake training on the correct donning and doffing procedures for asbestos specific PPE and the associated decontamination requirements. This will be undertaken for all employees who need to access areas or undertake work where the risk assessment has identified the need for asbestos PPE. Asbestos PPE consists of Category 3 Type 5/6 disposable coveralls/overboots and nitrile gloves. Each article is for single use only.

TNA will be undertaken annually by the Asbestos team to assess if further training/updates are required.
The University’s Asbestos team must be consulted prior to any inspection activities or work being undertaken in areas where asbestos PPE and RPE is to be worn. Asbestos risks will vary dependent upon the location and the specific nature of the activity to be undertaken. In some instances it may not be possible to undertake the required activity. In others, there may be the need for attendance from asbestos consultants or work may need to be undertaken by LARCs.

The University do not allow their own employees to undertake any work on asbestos products irrespective of the PPE and RPE that may be available.

Additional training will be required where audits, incidents or other sources identify any need.

### 6.6 General External Contractors/Consultants

All contractors/consultants, who undertake work as defined below, will be required to have, as a minimum, valid asbestos awareness training.

- Work on the fabric of the estate – building structure, fixtures, finishes, internal and external
- Work on building plant and equipment – mechanical, electrical, ventilation, gas etc
- Work which could foreseeably disturb any of the above
- Work planning or instructing those to undertake the above
- Workers who access non-occupied/service areas – plant rooms, ducts, risers, ceiling voids etc

### 6.7 Asbestos Consultants

Asbestos consultants provide a range of services to the University, each have specific training and experience requirements. These are as follows:

<table>
<thead>
<tr>
<th>Role</th>
<th>Minimum Training Requirement</th>
<th>Minimum Experience Requirement</th>
</tr>
</thead>
<tbody>
<tr>
<td>Asbestos Surveying</td>
<td>BOHS P402 or equivalent</td>
<td>12 months post authorisation</td>
</tr>
<tr>
<td>Analytical Monitoring and Clearances</td>
<td>BOHS P403 &amp; P404 or equivalent</td>
<td>12 months post authorisation</td>
</tr>
<tr>
<td>Specification Production</td>
<td>BOHS P402, P403 &amp; P404 or equivalent</td>
<td>3 years experience of both surveying and analytical work</td>
</tr>
<tr>
<td>Register Input</td>
<td>Asbestos Awareness</td>
<td>Excel/SQL experience</td>
</tr>
<tr>
<td>Bulk Analysis</td>
<td>BOHS P401 or equivalent</td>
<td>Participation within AIMS</td>
</tr>
</tbody>
</table>

### 6.8 Licensed Asbestos Removal Contractors

LARCs will require licensed asbestos removal training that is assessed or refreshed on at least an annual basis.

### 6.9 Asbestos Senior Technical Authority

Those fulfilling the Senior Technical Authority role will be required to demonstrate extensive experience of working within the asbestos industry. A minimum of 10 years relevant asbestos experience will be required along with either the CCP or CoCA certificate of competence in asbestos.

Ideally, those fulfilling the role of Senior Technical Authority will be able to demonstrate ongoing and continued professional competence beyond the qualifications stated. This could be demonstrated by membership to the Faculty for Asbestos Assessment and Management (FAAM).
7 IDENTIFICATION AND ASSESSMENT OF ACMS

Regulation 4 of CAR 2012 states that suitable and sufficient assessments must be undertaken to ascertain whether asbestos is or is liable to be present. Regulation 5 of CAR 2012 states that employers must not undertake work which may disturb building structure/services unless suitable and sufficient assessment as to whether asbestos is present. Assessments must also be made on the nature of the materials identified and the risk potential they present.

The University fulfil the requirements set out above by undertaking a range of asbestos surveys utilising approved asbestos consultants and by undertaking inspections within the Asbestos team. Where no information is available, the assumption will be made that asbestos is present and works cannot be undertaken until further assessment is undertaken.

7.1 Historical and Current Positions

The University has historically undertaken a range of asbestos surveying including Type 2 and Type 3 surveys and since the change in guidance in 2010, these have been replaced by management surveys and refurbishment and demolition surveys as specified in HSG 264 Asbestos: The survey guide.

Starting in 2018, the decision was made by the University to undertake full management surveys for the pre-2000 estate. This work was completed in 2020. This was done to form a ‘base line’ data set to populate the online asbestos register and was considered necessary due to extensive re-development of the estate and concerns regarding suitability of existing space references for previously identified ACMs.

7.2 Asbestos Surveys

Any properties which were constructed before 2000 have the potential to contain ACMs and therefore will be subject to the requirements under CAR 2012. The University will undertake asbestos Management Surveys to all properties constructed before this date.

Where intrusive work to buildings constructed pre-2000 is planned additional asbestos surveying will also be required. Dependent on the scope of the works asbestos refurbishment or demolition surveys will be required. Additional surveys will be required irrespective of whether asbestos has been identified within the management survey.

All asbestos surveying will be undertaken by University approved, UKAS accredited asbestos consultants inline with the requirements of HSG 264 Asbestos: The Survey Guide. All asbestos survey reports will be collated by the Asbestos team and archived within the Asbestos Safety Management folder on the Estates R Drive.

Re-inspections will be undertaken by both UKAS accredited asbestos consultants and the University Asbestos team.
**Management Surveys**

Management surveys should locate, as far as reasonably practicable, the presence and extent of any suspect ACMs that could be damaged or disturbed during normal occupancy, including foreseeable maintenance and installation. Assessment must also be made of the condition of these items.

Management surveys should include an assessment on the condition of the ACMs and their potential to release fibres into the air if disturbed. This will be done through material assessment scoring which will form the starting point for assessing the risks posed by the ACMs.

Management surveys will typically include a combination of both sampling and presumptions of suspect material and ACMs.

Management surveys will also include limitations or areas of no access, which have not been subject to inspection. These areas must be presumed to contain asbestos until suitable checks have been undertaken.

**Refurbishment Surveys**

Refurbishment surveys will be required where the proposed work will include significant or highly intrusive work to the building structure. This may include (but is not limited to):

- The removal or opening up of fixed structures such as partitions, walls, fixed ceilings, boxings, roof coverings
- The removal of room furniture or finishes such as door sets/architraves, skirting, windows, floor coverings, fixed benches or seating, claddings
- Work on plant and equipment such as removal of plant/pipes in boiler rooms, boiler dismantling, work on ventilation duct systems, pump replacements

Refurbishment surveys will be fully intrusive – intrusions will be representative of the work required and aggressive inspection techniques will be used. It is essential that sufficient detail regarding the scope of the work required is provided to the asbestos surveyor to ensure that appropriate investigations are undertaken.

It is anticipated that many projects may not commence until a number of months after the survey has been completed. Therefore, the University require material assessments to be undertaken for all ACMs identified in refurbishment surveys. Additional consideration will need to be given to suitable ‘making good’ of any intrusions made to continue normal use of these areas until the work is undertaken. This will be dependent on the nature of the intrusion and the space being surveyed.

Refurbishment surveys should be undertaken in unoccupied areas and consideration may need to be given to the isolation of live services.

Refurbishment surveys should not contain any presumptions or limitations unless prior agreements are made. Any limitations, which are unavoidable, must be considered by the project/work and may be resolved by a secondary survey visit upon full access being available.

**Demolition Surveys**

Demolition surveys will be required prior to the demolition of full buildings or significant areas or aspects of a building. This type of survey will be fully intrusive and will consist of aggressive inspection techniques to all building structures, finishes, plant, equipment, fittings etc as detailed for refurbishment surveys above.

Demolition surveys must be undertaken in unoccupied areas and will require isolation of live services within.

It will not be possible to return an area to normal use prior to the work being undertaken following a demolition survey.

**Re-inspections**

Any ACMs which have been identified within surveys, which are not scheduled for removal, will be subject to periodic re-inspection. Re-inspection frequencies will be based upon the risk potential but this will typically be based upon an annual cycle.

Re-inspections will consist of a visual inspection of all asbestos applications to assess and record whether any changes have occurred. This may be changes in condition, surface treatment or changes to the usage of the areas where they are located.

The asbestos register will be updated upon completion of the re-inspection process.
7.3 The Asbestos Register and Accessing Information

The University asbestos register is held within the estates management system Planon. All spaces within pre-2000 buildings contain records relating to their asbestos status and have details of asbestos products present. The Asbestos team are responsible for maintaining the asbestos register and for ensuring that information within is updated when changes occur.

All users will require their own login to access the information – this is to ensure that appropriate access rights can be set and use of the system can be accurately monitored. Non University persons who require asbestos information must either be provided with this, or have access to the asbestos register arranged, by their commissioning manager with support from the asbestos team.

If required, the most recent asbestos management surveys, and re-inspection reports can be accessed via the Asbestos Management Pages on the EFCD Health, Safety & Compliance Sharepoint Hub.

The Asbestos Management Sharepoint contains:
- Asbestos survey reports
- Asbestos documents
- Asbestos forms
- Restrictions and SSOW
- Asbestos Safety Group documentation

The Asbestos team can be contacted if further advice is required following review of the asbestos management reports/register. Where higher risk and/or damaged asbestos products have been identified, access to these areas has been restricted until abatement work can be undertaken. Any areas of restriction are detailed within the Restrictions and SSOW pages which includes annotated floor plans. The asbestos team should be contacted regarding any access or proposals for these locations.

7.4 Assessing the Risks

All ACMs identified will be subject to risk assessments which will be based upon Material Assessment Scoring and subsequent Priority Assessment Scoring. The scoring systems used will be as per the guidance within HSG 227 and HSG 264.

**Material Assessments**

The purpose of material assessment scoring is to assess the relative risk of an ACMs ability to release asbestos fibres and therefore the potential for exposure. Material assessments will be undertaken for all identified and presumed ACMs, and will consider the following:
- Product type
- Extent of damage
- Surface treatment
- Asbestos type

Material Assessment scoring will be undertaken by the University approved asbestos consultants at the time of the survey, and will be included within both management and refurbishment survey reports issued. In addition material assessment scores will be reviewed, and amended as necessary, during the re-inspection of any previously identified ACMs. Following re-inspection, material scores will be updated within the asbestos register.

Full details of the material assessment scoring system can be found within Appendix III.
**Priority Assessments**

The purpose of priority assessments is to assess the potential risks which may result in disturbance of ACMs based upon the nature of the space, the location of asbestos within it and how the space will be used. Priority scoring will be undertaken for all identified and presumed ACMs. Priority assessments consider the following:

- Normal occupant activity
- Likelihood of disturbance
- Human exposure potential
- Maintenance activity

Priority Assessment scoring will be undertaken by the University approved asbestos consultants at the time of the surveys and will be included within management survey reports issued. In addition, priority assessment scores will be reviewed, and amended as necessary during the re-inspection of any previously identified ACMs. Following re-inspection, priority scores will be updated within the asbestos register.

As the information required for priority assessments relates mostly to the occupation and usage of the spaces, the University’s Asbestos team will provide specific guidance to the asbestos consultants to ensure that appropriate considerations are made. Priority scoring guidance is available for typical room types present across the estate, details of this guidance can be found in Appendix V.

There is no requirement to undertake priority assessments for ACMs identified within refurbishment or demolition surveys. However, the University may request that these are undertaken where it is known that there will be significant delay between survey and any subsequent removal works.

Full details of the priority assessment scoring system can be found within Appendix IV.

**Combined Risk Scores**

Once the individual material and priority scores have been generated, these are combined to form an overall risk score for each ACM identified. These scores provide an indicative assessment of the relative risk of each ACM and assist in determining where abatement is required and which items may require prioritisation. Categorisation of these combined risk scores can be found in the table below.

<table>
<thead>
<tr>
<th>Combined Risk Score</th>
<th>Categorisation</th>
<th>Actions Required</th>
</tr>
</thead>
<tbody>
<tr>
<td>2-8</td>
<td>Very low risk</td>
<td>Low risk products with applications unlikely to be disturbed – low exposure potential. Record in register and periodically re-inspect. Re-inspection frequencies are likely to be 12 months or longer.</td>
</tr>
<tr>
<td>9-13</td>
<td>Low risk</td>
<td>Applications which are in good condition and unlikely to be disturbed. Record in register and periodically re-inspect. Re-inspection frequencies are likely to be around 12 months.</td>
</tr>
<tr>
<td>14-17</td>
<td>Moderate risk</td>
<td>Higher risk products in good condition, moderate risk products which may require abatement, products in locations where disturbance is possible. May require more frequent re-inspections, repair, encapsulation or removal.</td>
</tr>
<tr>
<td>18-24</td>
<td>High risk</td>
<td>Higher risk products which due to their location and/or condition require urgent attention. These items require urgent attention/prioritisation and may require locking off/access restrictions and planned removal or abatement.</td>
</tr>
</tbody>
</table>

Asbestos risk scoring algorithms are a useful tool when considering multiple ACM applications across a large estate. The scoring process assists in determining which items require prioritisation when many actions may be needed. The University understands that risk scores are only indicative and that priority...
scoring can be somewhat subjective. There may be additional factors, beyond the set criteria, which may influence the need to undertake abatement. Therefore, all items that are identified as requiring action, and those which have become damaged, will be assessed on an individual basis to identify appropriate actions and associated prioritisation.

8 MANAGEMENT OPTIONS

All ACMs will be assessed via the processes detailed above and will be allocated risk ratings using the material and priority scoring algorithms. All identified asbestos applications will be assigned a specific recommendation appropriate to their score. This will be conducted by the University approved asbestos consultants during the surveys/inspections and will be documented within the subsequent reports. Typically, these recommendations will be broad and generic – eg remediation required – this could entail repair, encapsulation, enclosing etc.

The Asbestos team will review these recommendations and will specifically detail the actions required. These will primarily be based upon the risks but will also consider organisational knowledge of planned and reactive works, proposed refurbishment works and operational needs.

<table>
<thead>
<tr>
<th>Monitor/Manage in Situ</th>
<th>This option will be applied to ACMs which are unlikely to be disturbed or become damaged, are in good condition and/or are inaccessible or low risk.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Identified ACMs will be recorded within the asbestos register and will be subject to periodic reassessment to assess their ongoing condition. Re-inspection frequencies will be set dependent on the risk potential but will typically be based on an annual re-inspection. Higher risk ACMs within occupied areas/areas of heavy use may require re-inspections every six months. Lower risk ACMs such as floor coverings may only require re-inspection every two years.</td>
<td></td>
</tr>
<tr>
<td>The University will take a practical approach to re-inspections and will consider assessing all ACMs within a building while re-inspection of higher frequency items are being undertaken. Re-inspections will be undertaken by University approved asbestos consultants and the Asbestos team.</td>
<td></td>
</tr>
<tr>
<td>Re-inspection frequencies may also be reviewed upon the identification of issues or following audits.</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Repair</th>
<th>This option may be applied to ACMs that have become damaged and may involve the use of encapsulants and binders such as ET150 and scrim cloth. The option to repair ACMs will typically only be considered in the following circumstances:</th>
</tr>
</thead>
<tbody>
<tr>
<td>• As a temporary measure to make an application safe while full removal is planned</td>
<td></td>
</tr>
<tr>
<td>• Where full removal is not possible/practicable eg where ACM is integral to equipment/building structure</td>
<td></td>
</tr>
</tbody>
</table>

This option will not be preferred for use, as consideration must be given as to how and why the damage occurred and whether this is likely to reoccur.

| Encapsulate/Seal | This option will be considered and typically applied to higher risk ACMs which are in reasonable condition but are unsealed or lower risk ACMs where their location and use of the area makes them prone to disturbance. This will include unsealed asbestos insulating board (AIB), unsealed thermal insulation and associated residues to building structure and some textile products such as joint seals and vibration pads. |

<table>
<thead>
<tr>
<th>Enclose</th>
<th>This option may be applied to ACMs which have been identified as showing damage or to higher risk ACMs which are unsealed where it may not be possible or practical to encapsulate or remove. Typically, this may apply to applications that are not fully accessible due to location and/or surrounding building structure.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Enclosing will typically include ‘boxing in’ or over-cladding the ACM application with any boarding type product. When enclosing is undertaken, consideration must be given to the method of fixing or constructing the enclosure – fixing or drilling into ACMs will not be allowed. Additional considerations may also need to be given as to whether any enclosures constructed will need to be fire rated.</td>
<td></td>
</tr>
<tr>
<td>It may be necessary to construct temporary enclosures using polythene sheeting or similar around damaged ACMs in emergency situations. This will only be deemed acceptable where remediation works are being planned.</td>
<td></td>
</tr>
</tbody>
</table>
Restrict Access
In some instances ACMs will be identified which present a significant or immediate risk which cannot be immediately actioned or appropriately managed. In these instances, the initial option will be to restrict access. These situations will include:
- Areas where damaged asbestos material, residues or debris is present
- Areas where unsealed higher risk asbestos materials are present

Where physically possible this will include ’locking off’ through application of a hasp and staple and a suited asbestos padlock. Keys can only be obtained through direct consultation with the Asbestos team.

Where it is not possible to install/apply a lock (eg ceiling void) then access will be prohibited by a combination of additional measures which will include; updating register to reflect restriction, application of physical barriers, signage, communication with operational managers.

A register of restricted locations is located within the Asbestos Safety Management folder on the Estates R Drive. This is accessible via the asbestos management SharePoint pages.

Remove
This option will be applied to all asbestos applications which cannot be appropriately managed through any of the options detailed above. This will typically include ACMs which are damaged, those which are deteriorating, those which are redundant or associated with equipment which is redundant and removal of items to lift restrictions upon access as detailed above.

Removal will also be undertaken prior to project or maintenance work which will involve disturbance to the building fabric or infrastructure.

In some instances ACMs which are suitable for other management options, may be removed. This will be considered where:
- Removal of other adjacent items is required
- The cost of removal is on a par with other management options

9 SAFE SYSTEMS OF WORK

Regulation 6 of CAR 2012 states that the employer must not carry out work which is liable to expose employees unless there has been suitable and sufficient assessments of the risk undertaken. The potential for exposure must be assessed and the steps to help prevent or reduce this must be documented.

The University understands the requirements detailed above and have developed safe systems of work (SSOW) which must be used where asbestos risks are known. Typically the situations where SSOW are required will be locations where:
- Areas where damaged asbestos material, residues or debris are present
- Areas where unsealed higher risk asbestos materials are present

Areas identified as containing the above will be subject to access restrictions, where physically possible this will be enforced by suited asbestos locks. Keys can only be obtained through direct consultation with the Asbestos team. A register of locked off locations is maintained by the Asbestos team. Details of restricted locations can be found on the Asbestos Management Sharepoint site.

Currently the University has a number of areas where access is restricted due to asbestos. These areas will remain restricted until asbestos abatement has been undertaken. These spaces fall into the following categories:
- Service risers
- Ceiling voids
- John Dalton East ceiling voids

The Asbestos team have SSOW which provide details of the equipment and procedures required to access these locations. These systems were developed based upon:
- Review of known asbestos information
- Assessment on the exposure potential
- Simulated personal and reassurance air monitoring
- Documented methodology including equipment
- Donning and doffing of PPE and RPE
- Face fit testing
- Decontamination procedures

The SSOW will not be appropriate for all locations and all work activities that may be required. All access and proposed work within areas that have restrictions must be discussed with the Asbestos team prior to commencement. Any works that may result in significant disturbance will not be permitted.
10 CONTROLLING WORK/CONTRACTORS

HSG 227 clearly sets out the need to control work on the fabric of the University's buildings. This can be achieved through a combination of measures which include systems and procedures, permits, individual roles and responsibilities and contractor management.

The following sections identify the processes in place for varying work streams at the University. It should be noted that training does form an essential part of controlling work but this is specifically documented within section 6.0.

Where work is to be undertaken by internal operational employees, asbestos information will be accessible through the Planon asbestos app on their hand held devices. Where external companies are employed the asbestos information may also be accessible via the web based Planon system or must be provided prior to the work commencing on site.

10.1 Asbestos Process for Reactive Maintenance/Operational Work

Where work is non-intrusive and involves working upon existing and accessible building structure and/or plant and equipment within, the management survey information should be sufficient to identify any potential asbestos risks.

The supervisor/person instructing the works will check the asbestos surveys/register for the locations where the work is to be undertaken. Where there is no asbestos, or ACMs are in good condition and they will not to be affected by works, the work can proceed. However, those undertaking the work must be informed of any ACMs that have been identified within the areas of work.

If higher risk or damaged asbestos items have been identified, then further discussions must be held with the Asbestos team. It may be possible to undertake some tasks utilising safe systems of work but it may be necessary to undertake asbestos abatement prior to the work being completed.

10.2 Asbestos Process for Intrusive Works/Projects

Where proposed work (maintenance or project) will involve intrusive or disturbing activities then the existing management survey information is unlikely to be sufficient. In most cases, the planned work will need to have further investigations undertaken in the form of a Refurbishment Survey.

To ensure that the appropriate investigation is undertaken the exact details of the planned work must be provided. It is imperative that the details provided are as comprehensive as possible as they will be used to evaluate the existing asbestos information or to commission additional surveys or inspections.

The person planning the work is required to complete the first half of the ASB001 Asbestos – Project Scope of Work form. The form is available via the asbestos management SharePoint pages.
How to Complete the Form
The first section of the form requires users to provide basic information. The ‘Project reference’ is the reference that the scheme will be known by. The ‘Building/Project name’ is the area where the work will take place and the detail required in Spaces is the areas/rooms affected by the work. ‘The Description of Works’ will provide an outline of the planned project.

The next section, ‘Existing footprint of the area’, will require a detailed plan showing the outline of the area that will be affected by the work. This should be highlighted to ensure that the area is obvious. Depending upon how complex the scheme is, this might require several plans, any keys used in this section will need to be identified to ensure clarity.

The last section is the ‘Room specific scope of the works’. This is where all the detailed information for the project is provided. This must be broken down to a room-by-room basis with a full description of the intended work. It is important to include all areas that will be affected, including service runs or connections. These often extend beyond the immediate area of the planned work.

This form, complete with any supporting pertinent information, should be emailed to the Asbestos team for review. The Asbestos team will review all available asbestos information and provide a summary of this information, along with comments relating to the work required in each of the locations specified. The Asbestos team will also make recommendations as to the outcome and, if applicable, the next steps required.

There are three possible outcomes:
• Additional surveying/inspection may be required – this is where there is insufficient information in the register to cover the scope of works provided.
• A specification for asbestos works is required – sufficient information is available but asbestos is present that has to be removed before the scheme can commence.
• The project work can proceed – sufficient asbestos information is available and there is no asbestos present or none that would be affected by the planned works.

The completed form, signed and dated by the Asbestos team member, is then returned to the person planning the work stating which course of action is required. This process is summarised in the following flow chart:
Asbestos Management Plan

Project Manager completes ASB001 form detailing the scope of the works and areas.

Issued to Asbestos team

Asbestos team review known asbestos information

Yes

No

Is it a Large or Complex Project?

Yes

PM to instruct Asbestos Consultant to prepare specification

No

Asbestos Team to undertake site inspection

Form ASB001 returned to PM to complete Asbestos Abatement Scoping document

Asbestos team to sign off or amend scope

Form ASB001 returned to PM to instruct asbestos survey

Enough Information Supplied?

Yes

No

Enough Information Supplied?

Yes

No

Asbestos?

Asbestos team to prepare specification

Enough Information Supplied?

Yes

No

No further asbestos requirement return form ASB001 to PM

Asbestos considerations within projects.
10.3 Instructing Additional Asbestos Surveys/Inspections

It is the responsibility of the person planning the works to engage a University approved Asbestos Consultant to undertake the required refurbishment survey. Advice is available from the Asbestos team to ensure that the correct level of detail is provided to this organisation. Essentially all the required information should already be available on the ASB01 Asbestos – Project Scope of Work form.

Once the survey has been completed, the report will be issued and the Asbestos Consultant will also be required to provide a Planon load sheet containing the data from the survey. The report and accompanying spreadsheet should be forwarded to the Asbestos team. This is to ensure that all new information is uploaded into the asbestos register.

The person instructing the works is then required to review the survey report to assess the suitability of this for the proposed project works. Checks should include ensuring that all areas within the scope of the project have been surveyed and that no limitations exist.

Where asbestos items are identified, arrangements need to be made for their removal or abatement either prior to or as part of the project. The person instructing the works must liaise with the asbestos consultant to prepare a specification for the works required.

10.4 Preparing Specifications for Asbestos Works

Where ACMs have been identified for removal/abatement, a specification for abatement must be prepared. It is the responsibility of the person planning the works to engage a University approved Asbestos Consultant to prepare this specification. (Where the amount or nature of asbestos works is minimal, and when work load allows, the Asbestos team can also prepare specifications.)

The person instructing the works must provide the Asbestos Consultant with the details of all ACMs which require inclusion within the specification. The Asbestos Consultant will require access to site to prepare the specification.

10.5 Instructing Asbestos Removal/Abatement Works

It is the responsibility of the person planning the works to engage a University approved Licensed Asbestos Removal Contractor (LARC) to undertake the required asbestos removal/abatement works. Once the specification has been prepared this should be sent to the LARC to review. In the event of emergencies or urgent reactive maintenance it may not be possible to prepare a specification. In these instances, the Asbestos team should be consulted to help prepare appropriate information for the LARC. It is essential that arrangements are made for both the LARC and the Asbestos Consultant to attend site to inspect and assess all areas where work required. It is important that all parties (including MMU representatives) discuss the work required to ensure that problems can be identified and solutions found.

The LARC will submit a quote and will complete the pricing/programme schedule within the specification. This will be returned to the person instructing the work along with any details regarding availability and any notice requirements for the proposed work. LARCs will not notify works until an order has been raised.

Once confirmation of the work and indicative timescales/programmes have been received, the person instructing the works should discuss the analytical requirements with the Asbestos team. The University will require analytical attendance for all licensed work and any work being undertaken within occupied buildings or in areas immediately adjacent to other persons. Analytical companies must be employed directly by the University and should be instructed by the person planning the works.
10.6 Categorisation of Asbestos Works

Asbestos work is categorised dependent upon the nature of the work being undertaken, the nature of the product(s) involved and the potential risks presented and control measures required. The University require all asbestos work types to be undertaken by their approved LARC.

Licensed Work
Licensed work will typically be work on the higher risk ACMs which includes AIB, thermal insulation and sprayed coatings. This type of work requires notification to the relevant authority a minimum of 14 days prior to commencement on site. Licensed work will typically require enclosing and provisions must be made for decontamination facilities and analytical attendance.

Notifiable Non-Licenced Work (NNLW)
Notifiable Non-Licenced Work (NNLW) will typically be work on lower risk asbestos products where the condition is poor or the methods used will result in significant degradation of the materials. This type of work requires notification to the relevant authority prior to commencement on site. NNLW will require isolation from other persons/work areas and will often require analytical attendance.

Non-Licensed Work
Non-Licensed Work will typically be work on lower risk asbestos products where the materials or methods used present a low exposure potential. Non-licensed work will require isolation from other persons/work areas and will not necessarily require analytical attendance.

Following the completion of any asbestos abatement a completion pack will be required from the LARC and, where used, the Asbestos Consultant. For all works where an Asbestos Consultant has been used, they will be responsible for providing details to update the asbestos register. This will include a summary of all ACMs removed and a Planon load sheet (with scoring) for any ACMs remaining. All completion information must be forwarded to the Asbestos team to update the asbestos register.

10.7 General Contractor Requirements

Prior to commencing work on site external organisations must ensure that they have received a copy of the Pre-Start Work Planning form and any authorised permit to work (see section 10.8) from their EFCD representative in control of the works.

This is to ensure that:

- The works comply with CDM regulations 2015.
- The work is planned in a suitable and sufficient manner.
- All Manchester Met stakeholders are made aware of the works in advance of the works starting on site.
- The contractor has received suitable and sufficient pre-construction information, in particular highlighting the unique challenges and risks faced work at a University.
- The contractor has watched and understood the Manchester Met induction video and has received the Contractor Code of Practice, and confirmed this in writing.
- Relevant permits to work are already in place.

Further details can be found in the EFCD Control of Contractors procedure document.

10.8 Asbestos Permits

All asbestos survey, air monitoring and abatement works will require an asbestos permit approved by the EFCD authorised person prior to any works commencing on site.

The person instructing the work will need to submit a completed permit to work form, RAMS, training certificates and any other relevant information to the Asbestos Team for approval, this process could take up to 5 working days.

Further information can be found in the EFCD Permit to Work procedure.

If the scope of any project or work changes from what was originally specified, then additional checks regarding the suitability of asbestos information will be required. This applies to changes identified at any point throughout any of the processes detailed within this section.
11 SPECIALIST ASBESTOS SERVICE PROVIDERS

All work, or consultancy, which is directly related to asbestos, will only be undertaken by University approved specialist providers. Due to the highly prescriptive nature of asbestos legislation and guidance (including licensing and accreditations) and the risks involved, approval will only be issued following consultation/review by the Asbestos team. Details regarding these specialist service providers and the minimum requirements for each are stipulated below.

11.1 Asbestos Consultants

All asbestos consultancies who undertake work at the University will be UKAS accredited to ISO17020 and ISO17025.

The University have appointed the following asbestos consultants through an Official Journal of European Union (OJEU) framework. Standard work costs/rates have been supplied and any of the following companies may be approached to provide surveying, sampling, analytical, specification or general asbestos consultancy services.

Any order which is equal to or less than £25,000 may be directly awarded. Where the value exceeds £25,000, a mini-competition process will be undertaken with all framework consultants being invited to provide a price.

<table>
<thead>
<tr>
<th>Company Name</th>
<th>Services Provided</th>
<th>Contact Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>Environmental Essentials</td>
<td>• Management surveys&lt;br&gt;• Refurbishment/demolition surveys&lt;br&gt;• Re-inspection of ACMs&lt;br&gt;• Bulk sampling&lt;br&gt;• Analytical monitoring including 4SC&lt;br&gt;• Specification writing</td>
<td>Adam Whalley&lt;br&gt;0345 456 9953&lt;br&gt;07837027228&lt;br&gt;<a href="mailto:adamwhalley@environmentalesentials.co.uk">adamwhalley@environmentalesentials.co.uk</a></td>
</tr>
<tr>
<td>Santia</td>
<td>• Management surveys&lt;br&gt;• Refurbishment/demolition surveys&lt;br&gt;• Re-inspection of ACMs&lt;br&gt;• Bulk sampling&lt;br&gt;• Analytical monitoring including 4SC&lt;br&gt;• Specification writing</td>
<td>Ed Gilbert&lt;br&gt;03300 241 444&lt;br&gt;07943823096&lt;br&gt;<a href="mailto:Edward.Gilbert@santia.co.uk">Edward.Gilbert@santia.co.uk</a></td>
</tr>
</tbody>
</table>

In an emergency, where the Asbestos team and approved consultants cannot be contacted (eg out of hours) the following emergency numbers can be used:

01782 983 253
07507641456
07837027228
As a minimum, all asbestos consultants who undertake works at the University must have provided the following documentation to the Asbestos team for review:

- Evidence of UKAS accreditation to ISO17020 and ISO17025
- Evidence of current public and employer liability insurance
- Evidence of suitable employee training
- References from work undertaken – ideally within education sector

The checks detailed above have been undertaken for all of the companies appointed to the Asbestos Consultancy Framework.

### 11.2 Licensed Asbestos Removal Contractors (LARCs)

All asbestos works (irrespective of classification – licensed/non-licensed) will be undertaken by LARCs. All LARCs who undertake work at the University will hold a full three year license with no conditions from the Health and Safety Executive (HSE).

The University has appointed the following licensed asbestos removal contractors through an OJEU Framework. All of the following companies may be approached to provide any asbestos abatement works.

Any order which is equal to or less than £20,000 may be directly awarded. Where the value exceeds £20,000, a mini-competition process will be undertaken with all framework consultants being invited to provide a price.

<table>
<thead>
<tr>
<th>Company Name</th>
<th>Services Provided</th>
<th>Contact Details</th>
</tr>
</thead>
</table>
| Kaefer                              | • Licensed asbestos abatement  
  • Non-licensed asbestos abatement 
  • Project/work assistance          | Brian Gordon
  0191 493 2600
  07876 757883
  Brian.gordon@kaefer.com             |
| OPS Environmental Services          | • Licensed asbestos abatement  
  • Non-licensed asbestos abatement 
  • Project/work assistance          | Owen Finn
  01706 452 522
  07974099408
  owen@opsenvironmental.co.uk        |
  Peter Ingham
  01706 452522
  07946 358627
  peter@opsenvironmental.co.uk       |
In an emergency, where the Asbestos team cannot be contacted (e.g. out of hours) the Asbestos Consultant should be contacted first. If a LARC is required the following numbers can be used:

- 07802 698287
- 07974099408
- 0161 303 1899

### 11.3 Senior Technical Authority

Those fulfilling the senior technical authority role will be required to demonstrate extensive experience of working within the asbestos industry. A minimum of 10 years relevant asbestos experience will be required along with either the CCP or CoCA certificate of competence in asbestos.

Appointment to this role will require submission of CVs and references that must demonstrate the following:

- Significant technical and legislative knowledge
- Experience in asbestos management
- Experience of auditing and high level reporting

Ideally those fulfilling the role of senior technical authority will be able to demonstrate ongoing and continued professional competence beyond the qualifications stated. This could be demonstrated by membership to the Faculty for Asbestos Assessment and Management (FAAM).

Senior technical authorities may be employed to provide the following services:

- Technical advice and support
- Asbestos works which fall outside the scope of the framework
- Independent review of framework companies
- Independent management audits
12 ASBESTOS INCIDENTS, EMERGENCIES AND REPORTING

Asbestos incidents and emergencies can be categorised as being one of the following:

- Discovery of a suspect ACM
- Disturbance or damage of a known or suspect ACM
- Uncontrolled release of fibres during asbestos abatement works

In any of the instances detailed above the Asbestos team must be contacted immediately.

12.1 Discovery of a Suspect ACM

The University has comprehensive records regarding asbestos, undertakes additional asbestos surveys for project work and has procedures in place to assess suitability of asbestos information and disseminate it appropriately. However, the potential for the discovery of unknown ACMs remains and the process to follow is detailed below:

- Stop work and contact the person instructing the works and the Asbestos team immediately.
- If the Asbestos team are not available (eg out of hours) please contact the asbestos consultants detailed in section 11.1 or ring the emergency contact numbers.
- The Asbestos team will check the asbestos register and other available reports and documentation to identify whether this material has previously been sampled.
- The Asbestos team will attend site to inspect material, if appropriate sampling will be arranged.
- Where samples are deemed necessary, works may have to cease until confirmation has been received following laboratory analysis.

12.2 Disturbance or Damage to an ACM

Where a material becomes damaged, is disturbed, or it is known or suspected that it is an ACM, it is essential that the following steps are taken to mitigate the risks:

- Stop work and contact the person instructing the works and the Asbestos team immediately
- Secure the area and prevent anyone else from accessing this location – signage and barriers as needed.
  - If damaged material is on personnel and/or clothing they must remain nearby and if possible, be isolated from others.
- The Asbestos team will check existing asbestos records and attend the site to assess the situation, additional requirements may include:
  - Emergency decontamination of personnel
  - Additional sampling of suspect materials
  - Air testing by the Asbestos Consultant
  - Attendance of LARC to undertake emergency removal or making safe works
- All works on site will have to cease until the material can be made safe or removed.

Additional details regarding emergency decontamination procedures and when these may be necessary can be found in the HSE guidance sheet em1 which can be found in Appendix VI.

Following these initial steps, it is likely that further planned asbestos abatement will be required following resolution of the immediate concerns.

12.3 Uncontrolled Release During Abatement Works

Where analytical monitoring, associated with asbestos abatement, indicates that elevated airborne fibre levels are present the following must be undertaken:

- Stop works and undertake inspection/assessment of enclosures and/or control measures.
- Secure the area and prevent anyone else from accessing this location – signage and barriers as needed.
- Contact the person instructing the works and the Asbestos team immediately.
- Undertake emergency decontamination to
surrounding area.

- Assess the integrity of the enclosure through visual inspections and smoke testing.

- Re-assess risk assessments and methodology to establish whether changes need to be made.
- Upon works re-commencing initiate additional air leak/reassurance air testing.

12.4 Investigation and Reporting

Any asbestos incidents and emergencies (as detailed above) will require sufficient investigation and subsequent reporting to be completed. This process will typically involve input from those undertaking the works, those who instructed and managed the works and the Asbestos team.

It is essential that investigations try to identify the root causes and contributing factors to ensure that lessons are learned and, where necessary, that changes are made. The findings from investigations will form an integral part of assessing the suitability of the AMP and will be considered for inclusion within planned asbestos training.

Additional consideration may need to be given to whether the asbestos incidents resulted in exposure, whether health records require updating and whether the event requires reporting under RIDDOR. Following the initial site attendance and air monitoring the Asbestos team will liaise with the EFCD Head of Health & Safety to discuss any additional requirements.

Where employees have been identified as having been exposed, an accident report form will be completed and sent to the University Health & Safety department. This information will be included on the employees’ health record. Investigations will need to consider and accurately document the following:

- The aims of the investigation and process to be used
- Details of the project/work being undertaken/ location(s)
- Details of the ACM/extent of disturbance/ method of disturbance
- Date/timeline from discovery to resolution including immediate actions taken
- Details of all persons involved
- Assessment of exposure
- Root causes and contributing factors
- Lessons learned and preventative actions including timescales
- Supplementary information – bulk certificates/ air monitoring/photographs
- Communication of findings

Any audits, which identify issues or areas of improvement, will be communicated with the relevant director/head/manager who is responsible for the areas identified.

13 AUDITING AND QUALITY ASSESSMENTS

Auditing is essential in assessing the suitability and effectiveness of the AMP – the processes detailed within cover many different areas and these need to be applied by a number of different persons/roles at the University. A range of areas will be assessed using a range of auditing techniques to help provide reassurance that the requirements within this document are being followed and are fit for purpose. The University Asbestos team will undertake a range of auditing which will assess the following criteria.

13.1 Auditing of the AMP and Asbestos Processes

The key areas identified for audit are detailed below along with a proposed schedule for assessing each of the areas. This schedule is indicative and, where required, audits may have to be rescheduled due to workload.
Areas requiring audit will be assessed using a number of methods which will include reviewing external sources such as legislation, guidance and internal points of reference such as organisational structure, lines of responsibility and communication and job descriptions. In addition, representative samples of work, projects, documentation and personnel will be selected to aide these assessments. Details of the indicative audit considerations required are detailed below:

### Asbestos Policy audit considerations
- Check for updates in legislation and guidance
- Review the University roles/structure
- Review roles documented for review and approval

### Duty holder requirements audit considerations
- Check for updates in legislation and guidance
- Review the University roles and organisational structure

### Key persons and responsibilities audit considerations
- Review the University roles and organisational structure,
- Identify if new roles and responsibilities need to be considered
- Interview a sample of persons fulfilling key roles to establish understanding of responsibilities
Competencies and training audit considerations
- Review Asbestos team personnel and CPD
- Review the University asbestos training registers against employee lists and job descriptions/responsibilities
- Review training matrices from specialist asbestos service providers
- Audit a selection of contractors undertaking work at the University for asbestos awareness training:
  - Maintenance contractors
  - Project contractors

Asbestos Management Plan document audit considerations
- Review against the requirements of HSG227
- Check for updates in legislation and guidance

Identification of asbestos and the asbestos register audit considerations
- Will be periodically checked upon receipt of reports and certificates from asbestos consultants
- Audit/re-survey a selection of areas to assess suitability and quality of work undertaken
- Audit a random selection of data points (samples, rooms, limitations) identified in survey reports/re-inspections and analytical completion documents – assess if the register reflects these
- Audit a random selection of data points from within the register and trace these within supporting documentation
- Run and review audit reports from register to assess access and use by the University’s employees

Dissemination of asbestos information audit considerations
- Audit a selection of maintenance jobs (Planon) and establish what asbestos considerations were undertaken and whether these were appropriate
- Select project(s) to assess what asbestos information was provided and whether this was appropriate

Control of contractors audit considerations
Audit a selection of contractors undertaking work at the University to review
- How they were instructed
- Their access to asbestos information
- Sign off processes upon work completion

Working on building fabric audit considerations
- Audit a selection of maintenance jobs (Planon) and establish what asbestos considerations were undertaken and whether these were appropriate
- Audit a selection of employees (both operational and management) to assess their understanding of suitability of asbestos information

Asbestos in projects audit considerations
Randomly select project(s) to review and assess an applicable selection of the following criteria:
- Were correct procedures followed?
- Was appropriate asbestos information obtained such as ASB001, additional surveys and inspections?
- Was asbestos abatement undertaken as per requirements?
- Were the analytical requirements appropriate?
- Has completion paperwork/register update been provided?
- Has sign off from the Asbestos team been undertaken/documented?

Safe systems of work (SSOW) audit considerations
- Review of procedures in place and where applicable air monitoring
- Review of areas/locations where SSOW are required
- Audit a selection of employees who utilise asbestos SSOW to assess knowledge
13.2 Auditing of Specialist Asbestos Service Providers

The following table details the types of audits that will be undertaken by the Asbestos team on the specialist asbestos service providers; this includes Asbestos Consultants and LARCs. The Asbestos team will endeavour to audit a representative sample of all activities/reporting on a monthly basis.

Any issues/findings will be reported to the consultants/contractors and where applicable the person(s) being audited. This communication, and the review of corrective and preventative actions put forward by the external providers will be undertaken by the Asbestos team. Any significant findings or repeated failures may result in suspension or termination of the service agreements.

<table>
<thead>
<tr>
<th>Audit Type</th>
<th>Audit Area</th>
<th>Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>Asbestos Consultant - Analytical</td>
<td>Site</td>
<td>Assessing working practices, documentation, equipment, certificates and paperwork.</td>
</tr>
<tr>
<td>Asbestos Consultant - Surveying</td>
<td>Site</td>
<td>Assessing equipment and paperwork.</td>
</tr>
<tr>
<td>Licensed Asbestos Removal Contractor</td>
<td>Site</td>
<td>Assessing working practices, documentation, equipment, site set-up, certification and paperwork.</td>
</tr>
</tbody>
</table>
| Post clearance checks assessing the work of both Asbestos Consultants and LARCs | Site             | Following completion of 4 stage clearances or completion of statement of cleanliness. Spot checks of previous work areas.  
  • All ACM removed/abated as required  
  • No dust and debris  
  • No equipment  
  • No enclosure materials |
| Asbestos Survey Reports                          | Office           | Assessing the content and quality of issued survey reports including:  
  • Meets requirements of HSG264  
  • Client, contact, site information  
  • Scope of works  
  • Caveats/access limitations  
  • Scoring and recommendations  
  • Photographs/diagrams |
| Analytical Certificates                          | Office           | • Client/site information  
  • Scope of works  
  • Calculations and reporting  
  • Caveats |
| Database Audit                                  | Office           | • Replicates issued report  
  • Photographs  
  • Correct location |

13.3 External Auditing and Assurance

To provide external and independent assurance, the Senior Technical Asbestos Authority will be employed to undertake audits of asbestos management at the University. External audits will be undertaken on a periodic basis or following the identification of significant failings.
14 UPDATING THE MANAGEMENT PLAN

As a minimum, the Asbestos Management Plan will be reviewed and updated on an annual basis. More frequent updates will be undertaken if there are changes within the organisation, processes in place, or if the legislative framework or asbestos specific guidance is updated.

Further review must also be undertaken if anything is encountered which may suggest that the plan is no longer suitable. This may be through (but is not limited to) auditing, incidents, feedback, complaints etc.

Updates to the AMP will be undertaken by the Principal Asbestos Safety Manager and will be forwarded to the EFCD Head of Health & Safety for review. The updated AMP will then be sent to the Director of EFCD for final sign off.

The Director of EFCD will present any updates of the AMP to the University Health & Safety Committee and the University Executive Group for sign off and dissemination.

Following approval, the PASM will communicate changes/updates to the plan through a combination of the following processes:

• Update AMP document on SharePoint
• Update AMP document on MMU legal and policies website
• Hold meetings with heads of departments and managers
• Produce memos highlighting changes
• Inclusion within asbestos training sessions
# APPENDIX

## Appendix I: University Building Lists

<table>
<thead>
<tr>
<th>Building</th>
<th>Date of Construction</th>
<th>Asbestos Management Survey</th>
<th>Identified Asbestos</th>
</tr>
</thead>
<tbody>
<tr>
<td>6 Great Marlborough Street</td>
<td>1893</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>18/19 Market Place, Stockport</td>
<td>1870</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>70 Oxford Street</td>
<td>1900</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>All Saints Building</td>
<td>1977</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>All Saints Library</td>
<td>1977</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Bell House</td>
<td>1831</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Benzie Building</td>
<td>2013</td>
<td>Not required</td>
<td>N/A</td>
</tr>
<tr>
<td>Birchall Way</td>
<td>1999</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>Bridgewater House</td>
<td>1912</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Brooks Building</td>
<td>2014</td>
<td>Not required</td>
<td>N/A</td>
</tr>
<tr>
<td>Business School</td>
<td>2012</td>
<td>Not required</td>
<td>N/A</td>
</tr>
<tr>
<td>Cavendish Teaching</td>
<td>1978</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Chatham Tower</td>
<td>1966</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Energy Centre</td>
<td>2014</td>
<td>Not required</td>
<td>N/A</td>
</tr>
<tr>
<td>Geoffrey Manton</td>
<td>1997</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Grosvenor East</td>
<td>2020</td>
<td>Not required</td>
<td>N/A</td>
</tr>
<tr>
<td>Grosvenor West</td>
<td>1880</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Institute of Sport (MMIOS)</td>
<td>1982</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>John Dalton Central</td>
<td>1966</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>John Dalton East</td>
<td>1974</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>John Dalton Engineering</td>
<td>2012</td>
<td>Not required</td>
<td>N/A</td>
</tr>
<tr>
<td>John Dalton Tower</td>
<td>1966</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Multi-Storey Car Park</td>
<td>2014</td>
<td>Not required</td>
<td>N/A</td>
</tr>
<tr>
<td>New Student Union</td>
<td>2015</td>
<td>Not required</td>
<td>N/A</td>
</tr>
<tr>
<td>Ormond Building</td>
<td>1881</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Platt Lane - 3G Dome</td>
<td>1998</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>Platt Lane - Leisure Dome</td>
<td>1998</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Platt Lane - The Complex</td>
<td>1984</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Righton Building</td>
<td>1905</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Sandra Burslem</td>
<td>2003</td>
<td>Not required</td>
<td>N/A</td>
</tr>
<tr>
<td>Salutation</td>
<td>1844</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>School of Digital Arts (SODA)</td>
<td>2021</td>
<td>Not required</td>
<td>Yes</td>
</tr>
<tr>
<td>Turing House</td>
<td>2000</td>
<td>Not required</td>
<td>N/A</td>
</tr>
<tr>
<td>Cambridge North</td>
<td>1996</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Cambridge South</td>
<td>1996</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Cavendish Hall</td>
<td>1978</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Dale</td>
<td>2014</td>
<td>Not required</td>
<td>N/A</td>
</tr>
<tr>
<td>Dunham Hall</td>
<td>2014</td>
<td>Not required</td>
<td>N/A</td>
</tr>
<tr>
<td>Naylor</td>
<td>2014</td>
<td>Not required</td>
<td>N/A</td>
</tr>
<tr>
<td>Warde</td>
<td>2014</td>
<td>Not required</td>
<td>N/A</td>
</tr>
<tr>
<td>Vine Hall</td>
<td>2014</td>
<td>Not required</td>
<td>N/A</td>
</tr>
</tbody>
</table>
Appendix II: The University Organisational Structures

Professional Services Organisational Chart

*Correct at the time of issue, updated versions available on the Shared Drive - R:\Services\Common\Info Store\Organisational Charts

Chief Operating Officer
& Clerk to the Board of Governors
Professor Karen Moore

Governance & Secretariat

January 2022
Estates, Facilities and Capital Development Organisational Chart

*Correct at the time of issue, updated versions available on the Shared Drive - R:\Services\Common\Info Store\Organisational Charts
Facilities Organisational Chart

*Correct at the time of issue, updated versions available on the Shared Drive - R:\Services\Common\Info Store\Organisational Charts

September 2020
## Appendix III – Material Assessment Scoring Algorithm

**Source:** [HSG 264 - The Survey Guide: Appendix 4: Material Assessment Algorithm](#)

<table>
<thead>
<tr>
<th>Sample Variable</th>
<th>Score</th>
<th>Examples of Scores</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Product type</strong></td>
<td>1</td>
<td>Asbestos reinforced composites (plastics, resins, mastics, roofing felts, vinyl floor tiles, semi-rigid paints or decorative finishes, asbestos cement etc).</td>
</tr>
<tr>
<td></td>
<td>2</td>
<td>Asbestos insulating board, mill boards, other low density insulation boards, asbestos textiles, gaskets, ropes and woven textiles, asbestos paper and felt.</td>
</tr>
<tr>
<td></td>
<td>3</td>
<td>Thermal insulation (eg pipe and boiler lagging), sprayed asbestos, loose asbestos, asbestos mattresses and packing.</td>
</tr>
<tr>
<td><strong>Extent of damage/deterioration</strong></td>
<td>0</td>
<td>Good condition: no visible damage.</td>
</tr>
<tr>
<td></td>
<td>1</td>
<td>Low damage: a few scratches or surface marks; broken edges on boards, tiles etc.</td>
</tr>
<tr>
<td></td>
<td>2</td>
<td>Medium damage: significant breakage of materials or several small areas where material has been damaged revealing loose asbestos fibres.</td>
</tr>
<tr>
<td></td>
<td>3</td>
<td>High damage or delamination of materials, sprays and thermal insulation. Visible asbestos debris.</td>
</tr>
<tr>
<td><strong>Surface treatment</strong></td>
<td>0</td>
<td>Composite materials containing asbestos: reinforced plastics, resins, vinyl tiles.</td>
</tr>
<tr>
<td></td>
<td>1</td>
<td>Enclosed sprays and lagging, asbestos insulating board (with exposed face painted or encapsulated), asbestos cement sheets etc.</td>
</tr>
<tr>
<td></td>
<td>2</td>
<td>Unsealed asbestos insulating board, or encapsulated lagging and sprays.</td>
</tr>
<tr>
<td></td>
<td>3</td>
<td>Unsealed laggings and sprays.</td>
</tr>
<tr>
<td><strong>Asbestos type</strong></td>
<td>1</td>
<td>Chrysotile</td>
</tr>
<tr>
<td></td>
<td>2</td>
<td>Amphibole asbestos excluding crocidolite</td>
</tr>
<tr>
<td></td>
<td>3</td>
<td>Crocidolite</td>
</tr>
<tr>
<td><strong>TOTAL SCORE</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
### Appendix IV – Priority Assessment Scoring Algorithm


<table>
<thead>
<tr>
<th>Assessment Factor</th>
<th>Score</th>
<th>Examples of Score Variables</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Normal occupant activity</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Main type of activity in area</td>
<td>0</td>
<td>Rare disturbance activity (e.g., little used store room)</td>
</tr>
<tr>
<td></td>
<td>1</td>
<td>Low disturbance activities (e.g., office type activity)</td>
</tr>
<tr>
<td></td>
<td>2</td>
<td>Periodic disturbance (e.g., industrial or vehicular activity which may contact ACMs)</td>
</tr>
<tr>
<td></td>
<td>3</td>
<td>High levels of disturbance (e.g., fire door with asbestos insulating board sheet in constant use)</td>
</tr>
<tr>
<td><strong>Secondary activities for area</strong></td>
<td>As above</td>
<td>As above</td>
</tr>
<tr>
<td><strong>Likelihood of disturbance</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>0</td>
<td>Outdoors</td>
</tr>
<tr>
<td></td>
<td>1</td>
<td>Large rooms or well-ventilated areas</td>
</tr>
<tr>
<td></td>
<td>2</td>
<td>Rooms up to 100m²</td>
</tr>
<tr>
<td></td>
<td>3</td>
<td>Confined spaces</td>
</tr>
<tr>
<td><strong>Accessibility</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>0</td>
<td>Usually inaccessible or unlikely to be disturbed</td>
</tr>
<tr>
<td></td>
<td>1</td>
<td>Occasionally likely to be disturbed</td>
</tr>
<tr>
<td></td>
<td>2</td>
<td>Easily disturbed</td>
</tr>
<tr>
<td></td>
<td>3</td>
<td>Routinely disturbed</td>
</tr>
<tr>
<td><strong>Extent/amount</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>0</td>
<td>Small amounts or items (e.g., strings, gaskets)</td>
</tr>
<tr>
<td></td>
<td>1</td>
<td>10m² or ≤10m pipe run</td>
</tr>
<tr>
<td></td>
<td>2</td>
<td>&gt;10m² to ≤50m² or &gt;10m to ≤50m pipe run</td>
</tr>
<tr>
<td></td>
<td>3</td>
<td>&gt;50m² or &gt;50m pipe run</td>
</tr>
<tr>
<td><strong>Human exposure potential</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Number of occupants</td>
<td>0</td>
<td>None</td>
</tr>
<tr>
<td></td>
<td>1</td>
<td>1 to 3</td>
</tr>
<tr>
<td></td>
<td>2</td>
<td>4 to 10</td>
</tr>
<tr>
<td></td>
<td>3</td>
<td>&gt;10</td>
</tr>
<tr>
<td><strong>Frequency of use of area</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>0</td>
<td>Infrequent</td>
</tr>
<tr>
<td></td>
<td>1</td>
<td>Monthly</td>
</tr>
<tr>
<td></td>
<td>2</td>
<td>Weekly</td>
</tr>
<tr>
<td></td>
<td>3</td>
<td>Daily</td>
</tr>
<tr>
<td><strong>Average time area is in use</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>0</td>
<td>&lt;1 hour</td>
</tr>
<tr>
<td></td>
<td>1</td>
<td>&gt;1 to &lt;3 hours</td>
</tr>
<tr>
<td></td>
<td>2</td>
<td>&gt;3 to &lt;6 hours</td>
</tr>
<tr>
<td></td>
<td>3</td>
<td>&gt;6 hours</td>
</tr>
<tr>
<td><strong>Maintenance activity</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Type of maintenance activity</td>
<td>0</td>
<td>Minor disturbance (e.g., possibility of contact when gaining access)</td>
</tr>
<tr>
<td></td>
<td>1</td>
<td>Low disturbance (e.g., changing light bulbs in asbestos insulating board ceiling)</td>
</tr>
<tr>
<td></td>
<td>2</td>
<td>Medium disturbance (e.g., lifting one or two asbestos insulating board ceiling tiles to access a valve)</td>
</tr>
<tr>
<td></td>
<td>3</td>
<td>High levels of disturbance (e.g., removing a number of asbestos insulating board ceiling tiles to replace a valve or for re-cabling)</td>
</tr>
<tr>
<td><strong>Frequency of maintenance activity</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>0</td>
<td>ACM unlikely to be disturbed for maintenance</td>
</tr>
<tr>
<td></td>
<td>1</td>
<td>≤1 per year</td>
</tr>
<tr>
<td></td>
<td>2</td>
<td>&gt;1 per year</td>
</tr>
<tr>
<td></td>
<td>3</td>
<td>&gt;1 per month</td>
</tr>
</tbody>
</table>

**TOTAL**
## Appendix V – Priority Assessment Guidance issued to Asbestos Consultant

Source: Manchester Metropolitan University

<table>
<thead>
<tr>
<th>Occupant Activity</th>
<th>Likelihood of disturbance</th>
<th>Human Exposure Potential</th>
<th>Maintenance Activity</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Normal Activity</td>
<td>Secondary Activity</td>
<td>Location</td>
</tr>
<tr>
<td>Bedroom</td>
<td>1</td>
<td>1</td>
<td>2</td>
</tr>
<tr>
<td>Café / Dining / Refectory</td>
<td>1</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>Consultancy / Corridor / Lobby / Reception</td>
<td>1</td>
<td>1</td>
<td>2</td>
</tr>
<tr>
<td>Data / Comm / Server</td>
<td>1</td>
<td>1</td>
<td>2</td>
</tr>
<tr>
<td>Dining</td>
<td>1</td>
<td>1</td>
<td>0</td>
</tr>
<tr>
<td>First Aid Room</td>
<td>0</td>
<td>0</td>
<td>2</td>
</tr>
<tr>
<td>Gallery / Museum / Exhibition</td>
<td>1</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>Kitchen</td>
<td>2</td>
<td>2</td>
<td>2</td>
</tr>
<tr>
<td>Laboratory</td>
<td>1</td>
<td>1</td>
<td>2</td>
</tr>
<tr>
<td>Library / Computer Labs</td>
<td>1</td>
<td>1</td>
<td>2</td>
</tr>
<tr>
<td>Lift</td>
<td>1</td>
<td>1</td>
<td>2</td>
</tr>
<tr>
<td>Meeting Room</td>
<td>1</td>
<td>1</td>
<td>2</td>
</tr>
<tr>
<td>Office</td>
<td>1</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>Office - Large</td>
<td>1</td>
<td>1</td>
<td>2</td>
</tr>
<tr>
<td>Photocopier / Printer Room</td>
<td>1</td>
<td>1</td>
<td>2</td>
</tr>
<tr>
<td>Plant Room / Maintenance / Electrical</td>
<td>2</td>
<td>2</td>
<td>2</td>
</tr>
<tr>
<td>Planum</td>
<td>0</td>
<td>0</td>
<td>3</td>
</tr>
<tr>
<td>Post Room</td>
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<td>2</td>
<td>2</td>
</tr>
<tr>
<td>Projection Room</td>
<td>1</td>
<td>1</td>
<td>2</td>
</tr>
<tr>
<td>Roof</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Roof Void</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Service Room / Duct</td>
<td>2</td>
<td>2</td>
<td>3</td>
</tr>
<tr>
<td>Shower / Changing / Lockers / Cloaks</td>
<td>1</td>
<td>1</td>
<td>2</td>
</tr>
<tr>
<td>Staff Room / Bree Room</td>
<td>1</td>
<td>1</td>
<td>2</td>
</tr>
<tr>
<td>Stairs</td>
<td>1</td>
<td>1</td>
<td>2</td>
</tr>
<tr>
<td>Store / Archive / Cupboard</td>
<td>1</td>
<td>1</td>
<td>2</td>
</tr>
<tr>
<td>Teaching Space / Studio / Lecture Theatre / Seminar</td>
<td>1</td>
<td>1</td>
<td>2</td>
</tr>
<tr>
<td>Toilet / Toilet Lobby</td>
<td>1</td>
<td>1</td>
<td>2</td>
</tr>
<tr>
<td>Workshop</td>
<td>2</td>
<td>2</td>
<td>2</td>
</tr>
</tbody>
</table>
Appendix VI – Emergency Procedure HSE em1

Source: Health and Safety Executive (HSE) - Em1 Asbestos Essentials: What to Do if You Discover or Accidentally Disturb Asbestos During Your Work