

Estates Management Arrangements and Procedures
EMAP02 – Interim Asbestos Management Plan



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Document Prepared By;
Robin Nower

Document Reviewed By;
Paul Lambert

Document Approved By;
Colette Willoughby

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1.1 Introduction

This Interim Asbestos Management Plan is designed to deliver the interim procedures and processes by which Queen Mary University are managing risks from Asbestos Containing Materials within buildings for which they have duty holder responsibilities. This Interim plan is a 'bridging' document between the existing Asbestos Management Plan (EMAP02) and the developing Asbestos Management Plan.

The Interim Asbestos Management Plan follows the asbestos compliance audit undertaken by ACL (Asbestos Compliance Ltd) in August 2018 (Reference AC1047) which has recommended significant asbestos compliance and management actions that affect the overall management of asbestos in the organisation.

QMUL acknowledge and accept the duty holder responsibilities for the management of asbestos in non-domestic premises in accordance with Regulation 4(1) of the Control of Asbestos Regulations 2012.

QMUL also acknowledge and accept that assessments (in the form of HSG264 asbestos surveys and inspections) of the buildings under their management control have identified a number of asbestos containing materials which require suitable management and control measures to prevent exposure and any spread of contamination.

To satisfy these duties QMUL acknowledge and fully intend to achieve compliance with the statutory management requirements as follows –

- Ensure that a determination of the risks posed by the asbestos containing materials is made, recorded and communicated as appropriate. (CAR2012, Regulation 4(8));
- Ensure that a written plan is prepared that details the measures that have been specified for the management of the risks, i.e. this Interim Asbestos Management Plan to be superseded by the QMUL Asbestos Management Plan that is in development. (CAR2012, Regulation 4(8));
- Ensure that there are adequate measures for the monitoring of the condition of the Asbestos Containing Materials and that the Asbestos Containing Materials are

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properly maintained which may include safe removal following the appropriate measures. (CAR2012, Regulation 4(9));

- Ensure that information about the location and condition of the Asbestos Containing Materials is provided to all who have a potential to disturb them, i.e. maintenance teams and sub-contractors, capital works principal contractors and sub-contractors, IT project contractors. (CAR2012, Regulation 4(9));

- Ensure that a suitable and sufficient assessment is undertaken prior to any demolition, construction, invasive maintenance, or other works that may disturb asbestos, usually including a refurbishment and demolition survey. (CAR2012, Regulation 5);

- Ensure that Asbestos Containing Materials are removed prior to any major refurbishment or demolition works. (CAR2012, Regulation 7));

- Ensure that all employees are given adequate information, instruction and training. (CAR2012, Regulation 10)).

QMUL acknowledge that other duties exist and fully intend to ensure that the asbestos management arrangements satisfy all prevailing statutory duties and requirements.

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1.2 Organisation

This Interim Asbestos Management Plan sets out only the key roles and responsibilities for asbestos management for the interim period. The developing QMUL Asbestos Management Plan will provide details of responsibilities for all appropriate roles within the University.

For the purposes of this Interim Plan all other roles are defined as 'Other Roles' and all persons who have any requirement for involvement in asbestos management activities, for example the requesting of asbestos surveys or services, or the clarification of existing asbestos management information, are defined within this category.

Key Roles –

Dutyholder – The Director of Estates, Facilities, and Capital Development.

At this time the Director is the Dutyholder's Representative but undertakes all of the duties of the dutyholder, crucially including the delegation to a competent person.

Responsible Person – The Head of Health and Safety EAF

Has asbestos management under their remit of control, and deputises for the Interim Asbestos Manager.

Interim Asbestos Manager

Key contact and conduit for ALL asbestos related activities, questions and queries. Must be consulted on all asbestos matters for the interim period and during the development of the QMUL Asbestos Management Plan and Arrangements.

Other roles - All other roles including Maintenance, Capital Projects, IT Projects, and all other supporting roles

Reporting, communication and consultation with the Interim Asbestos Manager on all asbestos matters during the interim period.

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Asbestos Management Meetings and Consultation

The Interim Asbestos Manager is formulating the terms of reference for the future Asbestos Management Meetings, including assessing the required attendees, the optional attendees and the process for consultation for all staff and stakeholders.

When complete the Interim Asbestos Manager will be programming Asbestos Management Meetings and providing invites to all relevant stakeholders.

Actions arising from the Asbestos Management Meetings will be included in the Strategic Action Plan with target dates for completion.

1.3 Distribution of the Asbestos Management Plan

In the interim period this Interim Asbestos Management Plan is to be distributed to all relevant stakeholders including the Maintenance Teams, Capital Works Teams, IT Projects Teams, and relevant contractors working on the QMUL estate.

The QMUL Asbestos Management Plan and Arrangements is being developed in stages so to ensure continual compliance the Interim Asbestos Manager will release specific Arrangements as they are completed and implemented. These will be distributed as Standard Operating Procedures for inclusion in the QMUL Asbestos Management Plan and Arrangements, managed and controlled by the Interim Asbestos Manager.

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1.4 Emergency Procedures

In the interim period the following basic emergency procedure should be used in all incidences of –

- Accidental and Uncontrolled disturbance of a known or suspected Asbestos Containing Material;
- Uncontrolled work within an Asbestos Restricted Area, including uncontrolled access;
- Discovery of a previously unidentified suspected Asbestos Containing Material;
- Failure of controls during asbestos remediation works (Contractor notifying)



The emergency contact is the Head of Health and Safety EAF who will be responsible for the investigation of all incidences and will notify the Interim Asbestos Manager to coordinate the emergency response.

Emergency Contact – Paul Lambert, Head of Health and Safety EAF – 07775 864256

1.5 Communication and Identification of ACMs

The Interim Asbestos Manager must be consulted on all matters regarding asbestos in the University during the interim period.

This includes –

- All requests for asbestos surveys and inspections;
- All requests for asbestos remediation works;
- All queries on existing asbestos survey and management information;
- Any other asbestos related questions and queries.

Maintenance, Capital Projects, and Other Projects

In-House activities

The Interim Asbestos Manager has developed an Asbestos Maintenance SOP with the Campus Managers that has been presented to and acknowledged by Maintenance teams.

This procedure requires all Maintenance operatives to check the existing asbestos information prior to their works and to provide acknowledgement of these checks. Where there is any doubt they are instructed to not undertake any works and to raise a query with the Interim Asbestos Manager.

The Interim Asbestos Manager is monitoring this process for compliance with the Campus Managers.

Maintenance Sub-Contracted activities

All maintenance trades and sub-contractors have been provided with copies of the most recent asbestos information (re-inspection reports) and details of all Asbestos Restricted Areas.

Prior to all works the sub-contractors are to provide full risk assessment to include assessment of the asbestos hazards identified in the asbestos registers, and plans of

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work (method statements) for how they intend to control the risks during their works.

Where works are intrusive, and where sufficient records are not available, i.e. where only re-inspection records exist, a refurbishment and demolition survey inspection will be required. This MUST be requested through the Interim Asbestos Manager on all occasions.

Capital, IT, and Other Planned Projects

The Interim Asbestos Manager must be consulted at the design stage of all Capital and Planned Projects (whether major or minor) to undertake a pre-construction information review of the existing asbestos information and to specify and obtain an appropriate asbestos refurbishment and demolition survey.

All surveys will be appropriately scoped based upon the specification of the refurbishment / planned works to ensure that suitable and sufficient information on ACMs is obtained leading to project certainty.

Asbestos Removal and Remediation

Where the asbestos pre-construction information and / or the asbestos refurbishment and demolition survey has identified asbestos containing materials that will affect the works, the Interim Asbestos Manager will form a specification of works and tender the asbestos removal to the panel of approved licensed asbestos removal contractors. Asbestos removal works will be awarded based upon the quality of the proposal submission which might not necessarily be the lowest priced offer.

The Interim Asbestos Manager will manage the asbestos removal process, including specifying the analytical cover required, issuing of the permits to work, monitoring the progress, and retrospectively collating and auditing of the certification and work locations.

1.6 Asbestos Register

Any queries, questions or concerns regarding asbestos containing materials and / or the asbestos re-inspection information must be directed to the Interim Asbestos Manager during the interim period.

To reduce the number of conflicting sources of information, the Interim Asbestos Manager is primarily using the current issue **asbestos re-inspection reports** as the primary source of information. This is further supported by the more recent OMC inspections of some high risk areas, and access to the Alpha Tracker online portal.

The asbestos re-inspection reports are being utilised by the maintenance teams and issued to sub-contractors during the interim period. Both still have access to the Alpha Tracker portal for reference.

The Interim Asbestos Manager is currently in the process of re-scoring all priority assessment information using a standardised room approach and producing spreadsheet registers for all areas which will supersede the asbestos re-inspection records and be used for the basis of planning future asbestos re-inspection programmes using a risk based approach. When completed these registers will be issued to the maintenance teams at the appropriate campuses for inclusion in the in-house asbestos register folders.

QMUL are currently in the process of specifying for all asbestos register information to be imported onto a hosted asbestos management system (likely to be part of an overarching integrated works management system), at which point access can be provided to all users for the identification of asbestos containing materials within their local area of works.

1.7 Asbestos Management and Monitoring

Asbestos Re-Inspections

Asbestos re-inspections have been undertaken during the 2018 period.

It is the intention of the Interim Asbestos Manager to re-programme the re-inspections in the future using a priority item based approach. This will ensure that high risk items are inspected more regularly than lower risk items.

To achieve this end the Interim Asbestos Manager is planning to re-score all priority assessments for asbestos containing materials using a standardised room approach.

Restricted Access Areas

A number of areas have been identified as having asbestos containing materials present in poor condition and are pending formal decontamination works. In the interim period these areas have been locked off with access only possible via the Interim Asbestos Manager and a formal Restricted Access Request. Access will only be sanctioned where the purpose of the access will not disturb the asbestos containing materials and where RAMS have been provided to detail how the access will be controlled.

The Interim Asbestos Manager will also be implementing a formal Controlled Access Procedure to ensure that all access is suitably monitored and recorded.

Physical Barrier Inspections

Areas within the Queens Building and Geography Building at Mile End Campus, and Dawson's Hall at Charterhouse Square campus are restricted with the use of physical barriers. These may be existing suspended ceilings or riser panelling. These areas have been clearly identified within the Restricted Access Areas, have been labelled, and are visually inspected for integrity on a monthly basis. At this time no access is possible in the areas.

Asbestos Remediation Programmes

The Interim Asbestos Manager is developing a priority asbestos removal programme and a programmed asbestos removal programme to address all restricted access areas followed by high risk items then all remaining asbestos containing materials on

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a priority risk basis. It is the intention of QMUL to plan for the removal of as many asbestos containing material as reasonably practicable.

Monitoring and Management of Asbestos Contractors, Analysts, and Surveyors

The Interim Asbestos Manager and Head of Health and Safety are refreshing the asbestos service providers for the interim period during which time a formal pre-qualification model is being developed to include Key Performance Indicators and monitoring programmes to assess and assure competency and quality of service.

It is the intention of QMUL to formally tender for all services in the future to ensure quality of services and fair competition.

1.8 Strategic Asbestos Action Plan

Asbestos Compliance Audit – ACL August 2018

The ACL asbestos compliance audit has identified a number of asbestos management issues that require attention. The audit has provided a number of recommendations and an action plan.

The Interim Asbestos Manager has developed a Strategic Asbestos Action Plan based upon these findings and recommendations in order to develop management options and rationale for delivering compliance.