



# Estates Division

## Facilities Management

London School of Economics & Political Science

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# Policy for the Control of Asbestos

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## London School of Economics Policy Statement of Intent

The aim of this London School of Economics policy is to prevent or minimise the risk from asbestos to the public, staff and students, so far as is reasonably practicable by effectively managing and controlling work where asbestos materials are present, in accordance with Approved Codes of Practice and Guidance.

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## 1.0 Introduction

Asbestos is a generic term for naturally occurring fibrous silicates. The fibres are hazardous because they cause lung diseases; the most important of which is mesothelioma, which is an aggressive cancer of the pleural membrane surrounding the lungs and lining the thoracic cavity, surrounding the heart (pericardium), and lining the body cavity (peritoneum).

The fibres were incorporated into a wide range of products designed to exploit the unique properties of the fibres. The presence of these asbestos-containing materials (**ACMs**) is not in itself dangerous unless they are disturbed or damaged. Anyone who becomes exposed to and inhales the respirable fibres released from ACMs is therefore at risk of developing the related lung diseases. Symptoms are not immediately apparent, there being a latency period between first exposure and the manifestation of symptoms. Mesothelioma in particular can be triggered by relatively low exposures with the victim being unaware that they inhaled the fibres, followed by a 40 to 50 year latency during which time there are no symptoms of disease but at onset mortality after 6 to 18 months.

A comprehensive set of regulations and supporting legislation imposes control over every aspect of work with asbestos and includes a specific duty to manage asbestos in non-domestic premises such as the School.

The School recognises that asbestos is present in areas of the properties under its control and that an effective strategy and associated procedures need to be in place in order to manage the risks to staff, students and visitors.

Every effort will be made to minimise the risk to staff, students, visitors, consultants and contractors by effectively managing and controlling work where asbestos materials are present.

This document sets out the London School of Economics and Political Science (hereafter referred to as LSE or 'the School') Policy, lists its objectives and the procedures that must be followed by designated staff responsible for procuring, controlling or carrying out construction or maintenance work.

## 2.0 Objectives

The LSE will have in place: -

- Asbestos surveys that identify and assess sources of risk from asbestos.
- An Asbestos Register that is accessible to all in-house and out-sourced staff that may be brought into contact with asbestos as part of their work activities.
- A Management Plan that puts in place control measures that take account of the risk assessment and prevents or minimises the risk from exposure to asbestos.
- Safe Working Practices in compliance of the Policy.
- A nominated senior manager to oversee and implement the Policy and Management Plan.
- Monitoring and recording procedures to ensure that the measures put in place are adequate and effective.
- Regular training of all relevant personnel to ensure they have a level of knowledge and competence commensurate with their involvement in the control procedures.
- Review the risk assessments annually or if any significant changes occur to the system.
- Review the Policy annually and earlier if any legislation has been introduced or amended.

## 3.0 Statutory Requirements

There is much legislation that places duties on employers and employees. Primary Statutory Instruments such as Acts of Parliament set out broad legal requirements that are then further developed in secondary instruments called Regulations. It is a criminal offence to fail to comply with these instruments. Regulations are supported by Approved Codes of Practice with a special legal status, and Guidance, which has no legal status. Failure to comply with an ACoP or its Guidance could be construed as failure to comply with the regulation and legal proceedings may follow. With regard to asbestos, the key items of legislation are outlined below:

- The **Health and Safety at Work etc. Act 1974** <sup>1</sup> (HASAWA) requires an employer to conduct their work in such a way that their employees will not be exposed to health and safety risks, and to provide information to other people about their workplace that might affect their health and safety.

- The **Management of Health and Safety at Work Regulations 1999** <sup>2</sup> require employers and self-employed people to make an assessment of the risk to the health and safety of themselves, employees and people not in their employment arising out of or in connection with the conduct of their business – and to make appropriate arrangements for protecting these people's health and safety.
- The **Workplace (Health, Safety and Welfare) Regulations 1992** <sup>3</sup> sets out duties to maintain workplace buildings/premises to protect occupants and workers.
- The **Construction (Design and Management) Regulations 2007** <sup>4</sup> requires the client to pass on information about the state or condition of any premises (including the presence of hazardous materials such as asbestos) to the CDM Coordinator before any work begins and to ensure that the health and safety file is available for inspection by any person who needs the information.
- The **Control of Asbestos Regulations 2012** <sup>5</sup> (CAR) requires employers to prevent the exposure of their employees to asbestos, or where this is not practicable, to reduce the exposure to the lowest possible level. CAR includes a regulation placing a duty on those who have repair and maintenance responsibilities for non-domestic premises to manage the risk from asbestos in those premises. Where there is no contract or tenancy the person controlling access will be the duty holder. There is also a duty of cooperation on other parties. The regulations define 'licensable work' and the specific disapplication relating to non-licensable work. The ACoP supporting the regulations, is '**Managing and working with asbestos**' **L143** <sup>6</sup>. Further details are to be found in the course manual accompanying the Asbestos Awareness training.

Other regulations relevant to construction work include the Control of Substances Hazardous to Health Regulations 2002, as well as working at height and confined spaces.

## 4.0 Roles and Responsibilities

**4.1 Duty Holder: Director of Estates:** is responsible for all strategic aspects of the School's properties including consideration of asbestos issues;

- Assembling and maintaining a suitably qualified Asbestos Management Team consisting of the following:
  - Head of Maintenance
  - Asbestos Manager
  - Deputy Asbestos Manager
- Ensuring that the team has adequate time and resources to enable them to fulfil their responsibilities; and retaining approved consultants and removal contractors;

- Supporting applications by the Directors of Capital Development and Facilities Management for necessary or anticipated resource allocation and funding from Director of Finance and Facilities;
- Reviewing the progress of asbestos issues relevant to all projects with the Asbestos Manager on a monthly basis;
- Ensuring that an annual external audit of the policy, procedures and management plan is carried out and the findings implemented to improve the system.

#### **4.2 Directors of Facilities Management, Capital Development and Residences and Catering Services** are responsible for:

- The application of or for available resources provided by Director of Finance and Facilities and subsequent allocation of these towards the optimum management of asbestos issues;
- Receiving advice from the Asbestos Manager on the inclusion / suspension / removal of asbestos related consultants / contractors and acting upon such advice;
- Discharging to the Asbestos Manager operational requirements within the agreed policy and financial framework;
- All Estates staff under their direct control, ensuring the Asbestos Manager arranges sufficient and suitable initial and updated training with respect to asbestos issues where appropriate;
- Ensuring that the Asbestos Manager is advised of all new members of staff that require training including details of any previous training.

#### **4.3 Asbestos Manager** is responsible for directing asbestos policy at the operational level. In particular, he is responsible for: -

##### **4.3.1 Asbestos Register:**

- Project manage the collation of the School's asbestos register for all buildings within the portfolio where the school is the 'duty holder', including all new acquisitions;
- Maintain the register and keep records up to date through information provided by other Estates staff and through works undertaken by the Asbestos Manager;
- Instruct, direct and liaise with the School's appointed asbestos surveyors, analysts and removal contractors.

##### **4.3.2 Managing Asbestos Materials:**

- Implement a pro-active Management Plan including prioritising action for removal / encapsulation and re-inspection as determined by the risk assessments;
- Raising awareness and understanding of asbestos with all staff and advising departmental administrators of the location of asbestos within their working areas;
- Develop applications to enable other departments including I.T. telecoms and A.V., external consultants and contractors to make requests for information regarding asbestos and respond to the requests by carrying out appropriate levels of investigation and provide documented response;
- Assess, review and recommend management action following periodic inspections, changes in regulations and / or current good practice;

#### **4.3.3 Managing Remedial Works:**

- Overseeing asbestos management contracts and in association with refurbishment contracts;
- Inspect materials thought to contain asbestos that are not on the register and advise on remedial action that should be taken;
- Assess the appropriate level of analytical support and attendance;
- Inform appropriate staff and liaise with departmental administrators in respect of asbestos related works;
- Selection of asbestos consultants and removal contractors;
- Monitor the performance of preferred contractors and consultants to assess their compliance with statutory requirements and competence to carry out asbestos related works; report and discuss deficiencies with the Director of Capital Development and make recommendations.
- Review and implement reports and audits by Health and Safety Officer and asbestos consultant.

#### **4.3.4 Informing, Liaising and Educating:**

- Preparation of technical procedures and policy documentation;
- Chair the asbestos management team meetings - these will be held annually;
- Annually review technical procedures and Policy documentation including review and implementation of annual review recommendations by the Health and Safety Team and Asbestos Consultants;

- Participating in the organisation and implementation of asbestos awareness and regular refresher training sessions for Estates staff;
- Regular dialogue with the Head of Health and Safety;
- Providing the HSE and other related bodies with details of asbestos management procedures where relevant.

#### 4.3.5 Record Keeping:

- Updating the Asbestos Register;
- Updating the asbestos drawings;
- Ensure that all statutory documents generated by the asbestos works are properly completed and a record kept;
- Keep detailed project records relating to asbestos remedial or investigative works;
- When notified of an uncontrolled escape of asbestos fibres ensure records are forwarded by the Project Manager or Maintenance Supervisors; assess the nature of the incident to ensure the correct procedures have been followed. Notify the Health and Safety Team of any uncontrolled escape of asbestos fibres and exposures;
- Maintaining financial records to ensure budgetary control is achieved and advise the Director Of Capital Development of future financial requirements;
- Quality assurance by audit of procedures will be undertaken, generally annually. The findings will be used in future training sessions to reinforce knowledge and correct failures of policy or procedures.

#### 4.4 **Project Managers and Services Managers (Residences)** are responsible for all works implemented by external consultants and contractors including mechanical, electrical investigation and building works. They shall:

- Adhere to the School's asbestos Policy;
- Deputise in the absence of the Asbestos Manager and the Head of Maintenance, by close liaison with the asbestos consultant who should be sought for advice in every instant;
- Assess areas prior to projects' starting to identify any known risk from asbestos by interrogating the asbestos register and, if appropriate, requesting via the Asbestos Manager a localised Refurbishment and Demolition survey;



- Halt work and inform staff if suspected asbestos material is discovered during the course of a project and seek advice from the Asbestos Manager;
- Implement the recommendations of the Asbestos Manager;
- Inform staff and contractors of the location of any known asbestos affecting a project;
- Ensure that all consultants / contractors employed by the School have trained their staff in asbestos awareness, consult with the Asbestos Manager as required;
- Ensure that all project information is passed to the Asbestos Manager at completion and project handover.

**4.5** Within Estates are staff that request, procure or actually carry out works that may disturb ACMs. Roles such as the **Head of Maintenance**, all **Maintenance Supervisors**, **Facilities Managers** etc. covering Facilities including Residences, Security etc., are involved in day-to-day maintenance including in-house labour, supervisory staff, the Help Desk and maintenance contractors. They shall:

- Attend all training as instructed by the Asbestos Manager;
- Ensure that staff under their control have sufficient and suitable initial and updated training with respect to asbestos issues where appropriate, and liaise with the Asbestos Manager;
- Adhere to the School's asbestos Policy ensuring that staff under their control do the same;
- Assess areas prior to works starting to identify any known risk from asbestos by interrogating the asbestos register and, if appropriate, requesting via the Asbestos Manager a Refurbishment and Demolition survey;
- Halt work and inform staff if suspected asbestos material is discovered during the course of any works and seek advice from the Asbestos Manager;
- Implement the recommendations of the Asbestos Manager;
- Inform maintenance staff and maintenance contractors of the location of any known asbestos that may affect works scheduled to be undertaken;
- Ensure that the asbestos register is interrogated by all maintenance staff prior to them undertaking maintenance tasks;
- Ensure that all maintenance contractors employed by the School have trained their staff in asbestos awareness, consult with the Asbestos Manager as required;

- Liaise with the Asbestos Manager in the event of an uncontrolled escape of asbestos fibres.

**4.6 The Estates Helpdesk** is the essential link in the chain between request and completion. The Job Request Form is the mechanism by which works orders are generated and allocated to maintenance staff. The Helpdesk is a portal to Planon so the Helpdesk staff shall be trained to facilitate interrogation of the register in response to staff queries and are able to give advice to maintenance staff when maintenance supervisors are not available. They may be the first to receive calls regarding uncontrolled releases and will therefore need to work closely with the Asbestos Manager and Estates personnel to coordinate a swift response.

**4.7 Estates Staff, IT and Contractors** are responsible for:

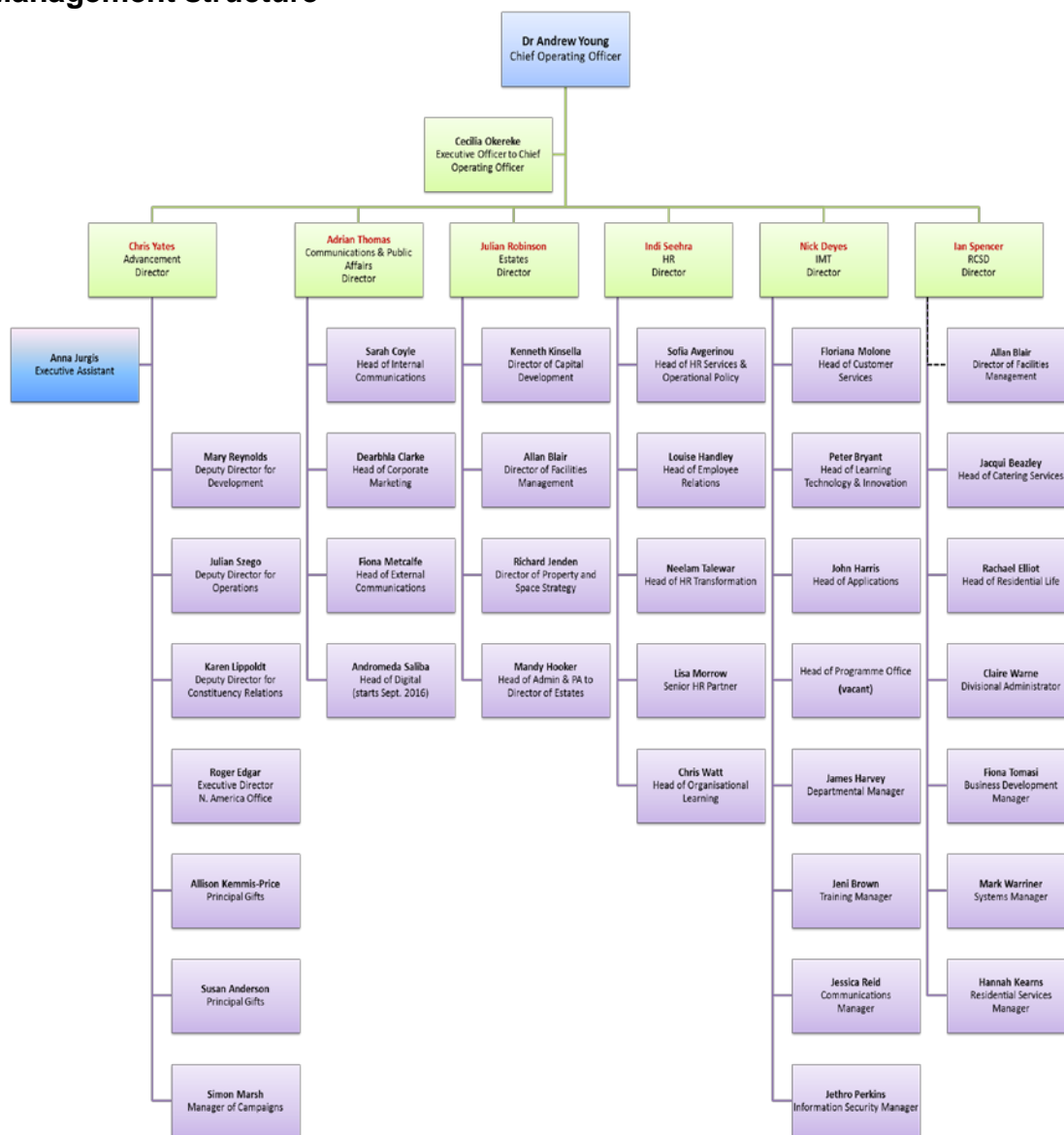
- Ensuring that any work that may disturb or damage a material containing asbestos is avoided;
- Contacting the Asbestos Manager and ensuring that the School's asbestos management plan is adhered to when work cannot be completed without disturbing asbestos;
- Halting work and seek advice from the Asbestos Manager if suspected asbestos material is discovered during the course of the works;
- Adherence to the School's asbestos management policy;
- Reporting immediately to the Asbestos Manager any materials suspected to contain asbestos where the materials have been disturbed or damaged, or where works are likely to be undertaken that may affect such materials.

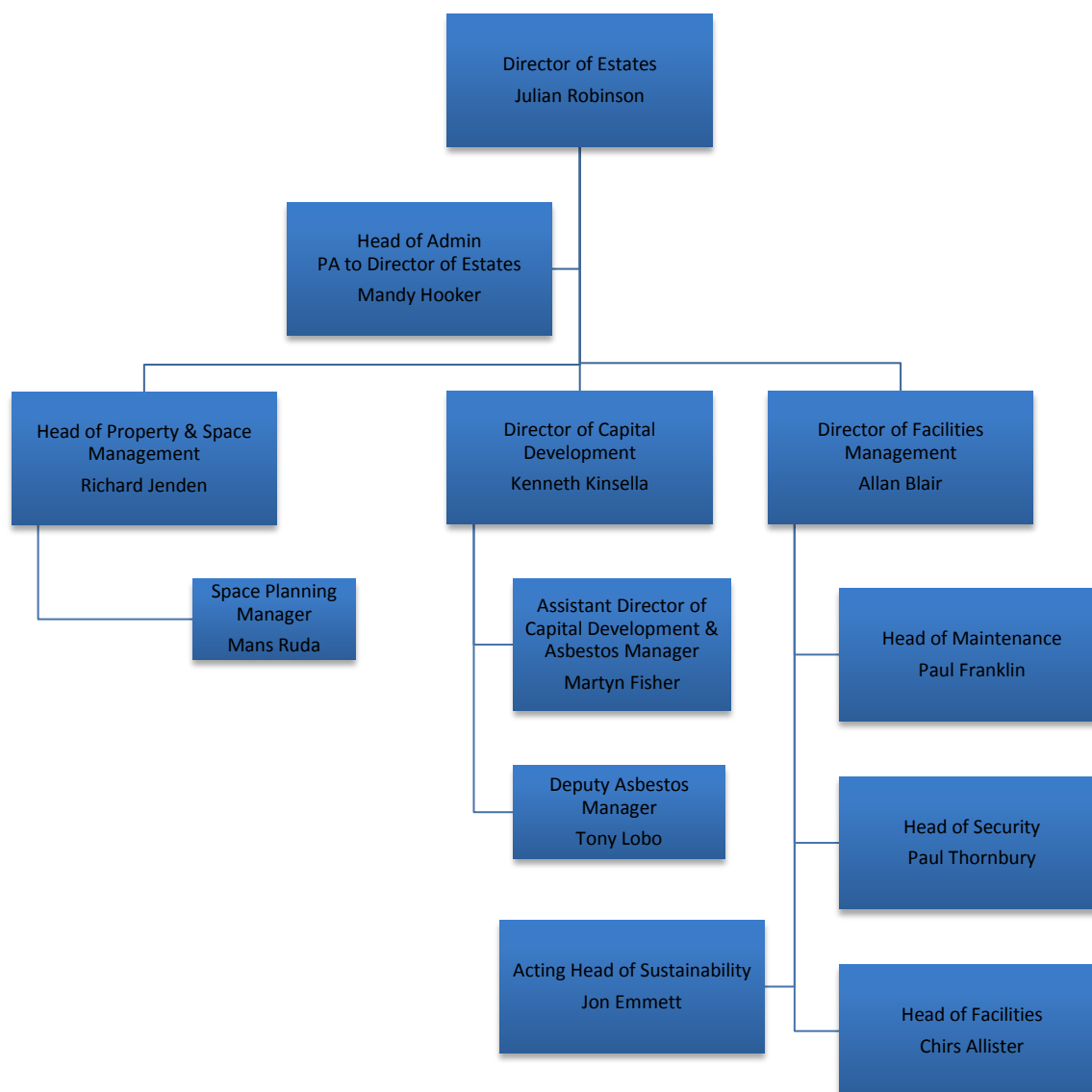
**4.8 The Head of Health & Safety** advises the School and its employees on health and safety issues, including technical guidance and compliance with health, safety and fire legislation; Undertakes occupational health and safety risk assessments on behalf of the School, workplace inspections, and audits; investigates any accident or incident occurring on School premises or arising from an activity organised by the School; is the main contact between the School and the various Enforcing Authorities, including the Health and Safety Executive and London Fire and Emergency Planning Authority. They shall:

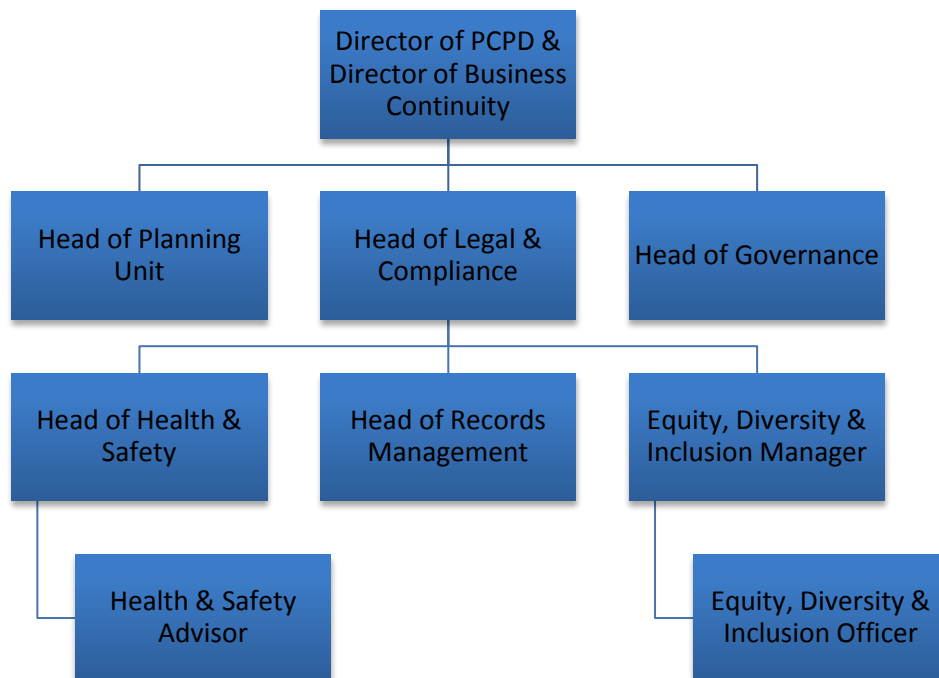
- Report incidents under the **Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013** <sup>7</sup> (RIDDOR);
- Provide advice on asbestos awareness training for all staff as necessary;
- Ensure that any reports of incidents that result in an uncontrolled release of asbestos fibre are entered onto the School's accident \ incident records;

- Investigate incidents that give rise to an uncontrolled release of asbestos fibre in conjunction with the Asbestos Manager. Ensure that a record is made on the personnel file of any individual who may have been exposed to asbestos fibre arising from an uncontrolled release of asbestos fibre;
- Co-ordinate the creation and maintenance, in conjunction with the Asbestos Manager (should it become necessary), of a health record and medical surveillance/screening programme approved by the HSE in the event that person/s are exposed to asbestos fibres due to an uncontrolled escape in accordance with L143;
- Liaise with departmental administrators on implementing asbestos screening programmes as detailed above;
- Offer informal counselling to members of staff who are known or suspected to have been exposed to asbestos materials and counselling is deemed appropriate;
- Undertake annual audit of asbestos policy in conjunction with the Asbestos Manager;
- Produce documented reports for the Asbestos Manager to review and implement.

## 5.0 Management structure







## 5.1 Management Options

The School has adopted the following management options for known ACMs:

Monitor	Periodic inspections at intervals of 12 months depending on the risk priority.
Label	<p>Most of the School's known asbestos; will be labelled, included within the permit to work scheme or fixed with an appropriate warning sign, where possible.</p> <p>Not all known asbestos-containing materials within the school will be labelled but they will be listed on the School's asbestos register.</p>
Protection/enclosure	A physical barrier such as timber casing protects some of the asbestos in the school. The casing should be sealed and as air tight as possible to prevent migration of fibres.
Seal/encapsulate	There are two methods of encapsulation: applying a durable layer adhered to the surface of the ACM such as PVA, or a material that penetrates the ACM before hardening which locks the material together. Both methods are reported to have a life of 20 years if undisturbed.
Repair	Repair will only be undertaken if the damage is slight. There are a number of methods including; filling, wrapping, localised encapsulation, PVA sprayed solution etc. All repairs use non-asbestos materials.

Permit to work	<p>Permit to work procedures exist throughout the School and will apply to areas that contain ACMs that have been identified as high risk to maintenance workers;</p> <p>A permit to work must be obtained prior to any works commencing. All areas that require a permit as a result of the presence of asbestos will be clearly labelled. To obtain a permit you must provide a method statement and risk assessment for the relevant works. Included in this you must appoint and provide details of a dedicated supervisor including their name, contact number and position in our company. Each method statement and risk assessment must be identifiable by a unique reference number.</p> <p>Application should be made to Head of Maintenance:</p> <p>Building Services, LSE Estates Division, Houghton Street, London WC2A 2AE.</p> <p>In very high-risk areas, the School will provide method statements identifying specific sequences of works required for safe working.</p>
Periodic air test	<p>Where there is a high level of asbestos in a confined space (example Peacock Theatre auditorium void) with a history of unauthorised disturbance, periodic air tests are undertaken to confirm safe access. This is coupled with the permit to work scheme.</p>
Remove	<p>The HSE recommend against unnecessary removal of asbestos as if undertaken without due consideration there is a potential to increase risk of harm. ACMs will be removed where it is found to be in poor condition and repair etc. is not possible, or it is impossible to undertake maintenance works without disturbing the materials, or refurbishment works are due to be undertaken.</p>

The School's Management Plan has been set up so that each individual ACM is managed according to its needs as above and is reviewed by re-inspection. Each inspection is logged on the asbestos database under the Asbestos Register for the specific ACM. Where appropriate at each inspection a photograph will be taken of the ACM and linked to the inspection log, which will build up a photographic record of changes to its condition.

## 5.2 Monitoring Arrangements

The known ACMs will be monitored by period inspection undertaken by the School's appointed asbestos consultants. The period between inspections will very depending on the risk assessment findings, as a general rule the periods will be 12-month intervals. Each new inspection will be recorded on the register with a photograph taken at the time of the inspection.

## 6.0 Asbestos Surveys

### 6.1 Recording the location and condition of ACMs (known and presumed)

Surveys shall be in accordance with the survey types described in HSE Guidance "**Asbestos: The survey guide**" **HSG 264**<sup>8</sup> i.e., either Management Surveys or Refurbishment and Demolition Surveys, depending on requirements.

Every material sampled and confirmed, presumed, or strongly presumed to contain asbestos, shall be risk assessed using the recommended algorithms viz. the material assessment (HSG 264) and the priority assessment ("**A comprehensive guide to managing asbestos in premises**" **HSG 227**<sup>9</sup>). Each sample point shall be photographed and its location accurately marked on the CAD plan. The full extent of all visually similar material and any areas, rooms or voids not accessed shall also be marked on the CAD plan.

The risk assessments in conjunction with the Control Actions and Management Actions recommended by the surveyor are then compiled into an asbestos register.

### 6.2 Management Surveys

The School undertakes this type of survey for all buildings where we have a duty to manage asbestos.

The purpose of the survey is to record, as far as is reasonably practicable, the location, extent, condition and accessibility of suspected ACMs that could be disturbed or damaged during normal occupancy including foreseeable maintenance.

The survey will entail minor intrusive inspection with sampling and analysis of presumed ACMs the standard approach, although sampling can be deferred to a later date e.g. when a proposed project impacts on it. Obvious ACMs may be strongly presumed: no sampling is necessary. Other materials may be documented as being visually similar to previously documented materials.

Reasonable access to all rooms, voids, ducts and services is expected and any area not inspected must be accurately reported and presumed to harbour ACMs until proven otherwise. Caveats should be avoided by discussion at the survey planning stage. Survey reports carrying caveats not agreed by the School will be rejected.

### 6.3 Refurbishment and Demolition Surveys

This type of survey is required before refurbishment, alterations or demolition works.



The purpose of the survey is to locate and describe, as far as is reasonably practicable, all ACMs (that have not previously been identified) in the building / area where works are to be undertaken, including cable routes.

This survey is designed to access all areas and is likely to involve destructive inspection, such as opening up of the structure to view inside cavities, floor voids, risers and services ducts etc. where such access would have been deemed unreasonable for the management survey. Specialist services may be required to facilitate access in the avoidance of caveats. Rigorous risk assessments for these surveys will be expected from the surveyor. Where licensed removal contractors are required to allow safe access the work may be regarded as licensable and the 14-day notification to the HSE applies.

Samples are taken and the type and extent/amount of the ACM is recorded. The material assessment is only conducted when circumstances dictate that the removal cannot follow immediately and the building would be occupied in the interim. In this case the damage inflicted by destructive inspection would require short-term remediation and the ACMs managed until the building is de-commissioned. Reassurance air testing may be required to prove fitness for reoccupation.

These surveys can be localised to specific parts of a premises depending on the nature and scale of the proposed refurbishment.

## 6.4 Priority Assessments

As recommended by the HSE, when an inspection or survey is undertaken for each of the School's known ACMs or presumed ACMs, a risk assessment is carried out to assist in deciding on appropriate action and formulating a management plan.

The risk assessments are carried out in two parts, the first is a material assessment which assesses the condition of the material and the likelihood of it releasing fibres if disturbed, the second part is a priority assessment which takes into account maintenance activities, likelihood of disturbance, human exposure potential, occupant activity or visitors.

Algorithms are used to score each item, which results in an overall risk assessment score.

The scores are not absolute measures, simply a guide as to the relative risk. The Management Actions that should be applied depend on the component scores for each ACM. Two ACMs with the same overall risk might not elicit the same response.

It is the task of the asbestos surveyor to apply the material assessment algorithm whilst it the task of the Asbestos Manager to apply the priority assessment. The asbestos surveyor may assist in this but the Duty Holder has the regulatory responsibility.

## **7.0 Asbestos Register**

### **7.1 Planon**

The asbestos register has been integrated into a web-based interactive database called Planon, which records amongst other things the location, extent and condition of all known and presumed ACMs identified in the survey reports.

The register is available to all Estates Supervisors and above. Any person undertaking works within a School building who does not have access to Planon must complete an Asbestos Information Request Form which can be obtained from the Asbestos Manager, Helpdesk or maintenance supervisor.

Relevant detail shall be made available to the emergency services.

Planon is a general Estates management tool but the Asbestos Manager shall be responsible for ensuring that the register within Planon is kept up to date with information regarding remedial works, removals and any newly located ACMs.

Where ACMs have subsequently been removed the records are archived but retrievable.

It is the responsibility of all Estates staff to report / provide the Asbestos Manager with any information they have relating to the presence or removal of ACMs within the School's portfolio.

Where the School acquires new buildings, or parts thereof, the Asbestos Manager will include the new acquisition in the management plan and commission the necessary surveys/inspections to be included in the register.

### **7.2 Continued monitoring of ACMs**

All known ACMs will be periodically re-inspected by the School's appointed asbestos consultants. The period between inspections will vary depending on the risk assessment findings, generally at 12-month intervals. Each re-inspection shall record the current condition of each ACM and re-photograph for the purpose of updating Planon.

### **7.3 Revising the Management Plan**

Planon is a live web-based system and relies on the input of up-to-date information including project handovers, contractors' plans of work etc. The system prompts regular review and revision of the information. These on-going revisions ensure Planon reports the current status of ACMs and archives information regarding removed ACMs.

## **8.0 Procedures**

### **8.1 An uncontrolled escape of asbestos fibres**

In the event of an uncontrolled release of asbestos fibre, immediate steps will be taken to mitigate those effects; restore the situation to normal and inform any persons affected. The Flow Chart in Appendix 1 is a schematic of the actions to be taken for four common scenarios that show how the scale of the problem leads to decisions and actions along a particular pathway. There is therefore no single reaction to all incidents: the severity of the situation should elicit a proportionate response. The use of this Flow Chart is important and shall be covered in training sessions.

#### **8.1.1 Severe Damage (significant dust visible)**

In the event that damage occurs to a high-risk ACM such as lagging, sprayed coating or insulating board all personnel within the area must leave and a Maintenance Supervisor and the Health and Safety Team must be notified immediately.

The Maintenance Supervisor will assess the situation and arrange for the affected area/s to be evacuated, locked and sealed off using asbestos hazard tape and polythene sheeting (LSE stores) to minimise spread of asbestos fibres into adjoining areas.

At no time should any person enter or re-enter the site.

The Maintenance Supervisor will then contact the Asbestos Manager or his Deputy in the first instance, or a School approved asbestos removal contractor (ARC) for attendance on site to decontaminate the affected area/s and remove ACM as deemed necessary.

The Maintenance Supervisor will also contact the School's approved Consultant / Analysis to undertake air tests and visual inspection.

The area/s will remain closed until a certificate of reoccupation is issued by the Consultant / Analysis.

#### **8.1.2 Slight Damage (no visible cloud of dust)**

In the event that damage occurs to a low-risk ACM such as asbestos cement or resinous WC cistern, a Maintenance Supervisor must be notified immediately and all persons within the area must leave.

The Maintenance Supervisor will assess the situation and arrange for the affected area/s to be evacuated, locked and sealed off using asbestos hazard tape to minimise spread of asbestos fibres into adjoining areas.

The Maintenance Supervisor will then contact a School approved asbestos removal contractor (ARC) for attendance on site to decontaminate the affected area/s, remove and/or encapsulate the damaged asbestos material. The Asbestos Manager or Deputy shall be informed of the incident.

The area/s will remain closed until the remedial works have been completed.

## **8.2 Record of Exposure and Health Checks**

In the event that staff are exposed to asbestos fibres above the Control Limit due to an uncontrolled escape, the School's Health and Safety Team will co-ordinate arrangements for maintaining appropriate health record and medical surveillance in accordance with L143, and reporting under RIDDOR 2013.

Informal counselling will be offered to any members of staff who are known or suspected to have been exposed to asbestos materials by the School Counselling Service.

## **8.3 Reporting Damage**

All staff have a general responsibility to report structural damage and defective fixtures and fittings to the Estates Helpdesk. It is the responsibility of all Estates Division, IT Services staff and contractors to report any suspected or damaged asbestos containing material to the Asbestos Manager.

Where the material is damaged see item 8.1.

Where material is found that is thought to be asbestos, the Asbestos Information Request Form should be completed and forwarded to the Asbestos Manager.

## **8.4 Access into an Asbestos Enclosure**

In the event of an emergency that requires immediate access into an asbestos enclosure, the person requiring access should be adequately inducted by the removal contractor and/or analyst who will provide them with the required PPE, advise them of the risks and procedures involved.

## **8.5 Building Refurbishment Works or Demolition**

All staff undertaking refurbishment project work or works involving demolition in campus or residential buildings have responsibilities as detailed under section 4.

It is imperative that the Project Manager reviews the Asbestos Register and contacts the Asbestos Manager to initiate a Refurbishment and Demolition survey of the area at project inception as failure to do so could cause substantial delays in commencement.

The Project Manager will provide a copy of the asbestos survey report to the project team with recommendations for any remedial action that should be incorporated into the project. The report will form an integral part of their risk assessment arrangements for compliance with CDM Regulations.

Where the Asbestos Manager recommends the removal of the asbestos material a licensed contractor and analyst shall be engaged in accordance with the School's procedures for procuring services from contractors. The asbestos removal works should be carefully programmed into the project so as to minimise damage to the asbestos and prevent or reduce exposure.

Project Managers should liaise with the removal contractor to determine and mitigate the effect of removal works on fire alarms, escape routes and signage, and emergency evacuation procedures. Project managers should ensure that the removal contractor has suitable arrangements in place for dealing with emergencies that may arise in the course of high-risk removal operations e.g. the remaining sprayed coating in the Peacock Theatre.

All contractors working for the School have responsibilities as outlined in the School Policy relating to procurement of services.

If suspect material is discovered during the course of the project works the person in charge shall halt the works, inform the Project Manager and take any necessary or recommended action.

The cost of surveys and all remedial works will be charged to the project.

On completion of any remedial works a completion document shall be retained with the project file / Health & Safety File and a copy issued to the Asbestos Manager by the Project Manager.

## **8.6 Building Alteration Works Including Services**

All Estates staff initiating modifications to building structures, services e.g. I.T, telecoms and A.V. etc. should review the asbestos register in the first instance. If they deem the information insufficient they must then seek advice from the Asbestos Manager as to the presence of asbestos within any parts of the building concerned and request a Refurbishment and Demolition survey. All requests to the Asbestos Manager should be made using the Asbestos Request Form together with details of the intended project works including drawings, schedules of works, start and completion dates and the like.

These works may be seemingly trivial but can have unexpected consequences if not properly considered beforehand, e.g. changing door furniture, shelf fixing, opening voids for

access, and other routine maintenance activities. Reference should be made to the Asbestos Awareness training manual to appreciate the range of ACMs commonly used in construction, plant and fixtures and fittings.

## **8.7 Maintenance Works Including Services**

All maintenance staff undertaking maintenance tasks should be advised by their Supervisor on their Job Request Form whether ACMs are present and the Asbestos Register should be consulted prior to work being undertaken.

## **8.8 School has an interest in a property but is not the Duty Holder**

Where the School leases part/s of their building/s to others but has no obligations for maintenance or repair under the terms of the lease and by definition is then not termed the 'Duty Holder', responsibilities under Regulation 4 of CAR 2012 lies with the occupants. In these circumstances the School will request a copy of their register and management plan and will cooperate with the identified Duty Holder to discharge his liabilities.

## **8.9 Asbestos Information Request**

The Asbestos Information Request Form should be completed and forwarded to the Asbestos Manager if information is required regarding asbestos.

If this is required for project works adequate time should be given to enable paperwork to be processed, surveys etc., to be undertaken and remedial works to be carried out or allowed for in the overall project. A 14-day notification period is mandatory with respect to licensable work on ACMs, e.g. sprayed coatings or pipe lagging. A waiver is only allowed for emergencies. Low-risk work is neither licensable nor notifiable e.g. vinyl floor tiles and resinous cisterns. Tasks involving AIB are mostly licensable but some lower-risk tasks would be Notifiable Non-Licensable Work. Asbestos cement products are not normally licensable but certain tasks involving badly weathered roof sheets would be notifiable. There is no specified period of notification for these works. All requests for Refurbishment and Demolition surveys should include extensive details of the intended project works including drawings, schedules of works, start and completion dates and the like.

## **8.10 Job Request Form**

All technicians and contractors should be asbestos aware and trained. They must consult the asbestos register before any work is undertaken and obtain permits where required. Work is only to be undertaken in asbestos free areas or where asbestos will not be disturbed. DO NOT TAKE ANY CHANCES.

Only licensed contractors may work on or remove ACMs, irrespective of whether the work is licensable or not.

An Asbestos Register is available for reference in the supervisor's office. All relevant staff will be trained on asbestos awareness (new starters will be signed up to attend the first available training session) and will follow best practice.

The job tickets contain a field 'asbestos register checked', which is to be completed before the start of a job.

Please consult and follow the emergency procedure in case of Severe Damage (significant dust visible) or Slight Damage (no visible cloud of dust).

Details can be found on:

[www.lse.ac.uk/collections/estatesDivision/Asbestos\\_Policy/Procedures.htm](http://www.lse.ac.uk/collections/estatesDivision/Asbestos_Policy/Procedures.htm)

## **9.0 Training Arrangements**

### **9.1 New Estates and ITS Staff**

All new staff identified as being relevant by the Asbestos Manager will be trained in the Asbestos Policy by their manager as part of their induction training.

All new staff will be asked by their managers to provide details of any training that they have previously undertaken including certification.

An appropriate training programme will then be developed by the Asbestos Manager and staff manager to bring them in line with the School's standards.

### **9.2 Refresher Training**

Estates staff will be required to attend annual refresher training courses in asbestos awareness, asbestos register, and the Asbestos Policy.

### **9.3 Additional Training**

The Asbestos Manager and Deputy Manager will hold the BOHS Proficiency Module P405: The Management of Asbestos in Buildings or the P407: Managing Asbestos in Premises; the Duty Holder Requirements.

## **10.0 Implementation, Review and Audit of the Policy**

([http://www.lse.ac.uk/collections/estatesDivision/Building\\_Services\\_Org.htm](http://www.lse.ac.uk/collections/estatesDivision/Building_Services_Org.htm))

### **10.1 Policy Review**

Asbestos Management Team meetings will be held annually and attended by the Asbestos Manager, the Head of Health and Safety, Head of Maintenance and Asbestos Consultant to review the Asbestos Policy and Management Plan and agree any necessary revisions

### **10.2 Internal Policy Audit**

The Health and Safety Team together with the School's approved Asbestos Consultant will periodically undertake an audit of the implementation of:

- Asbestos Management Policy
- Asbestos Management Plan

Their findings will form the basis of a report for the Asbestos Manager to review and implement.

### **10.3 External Audit**

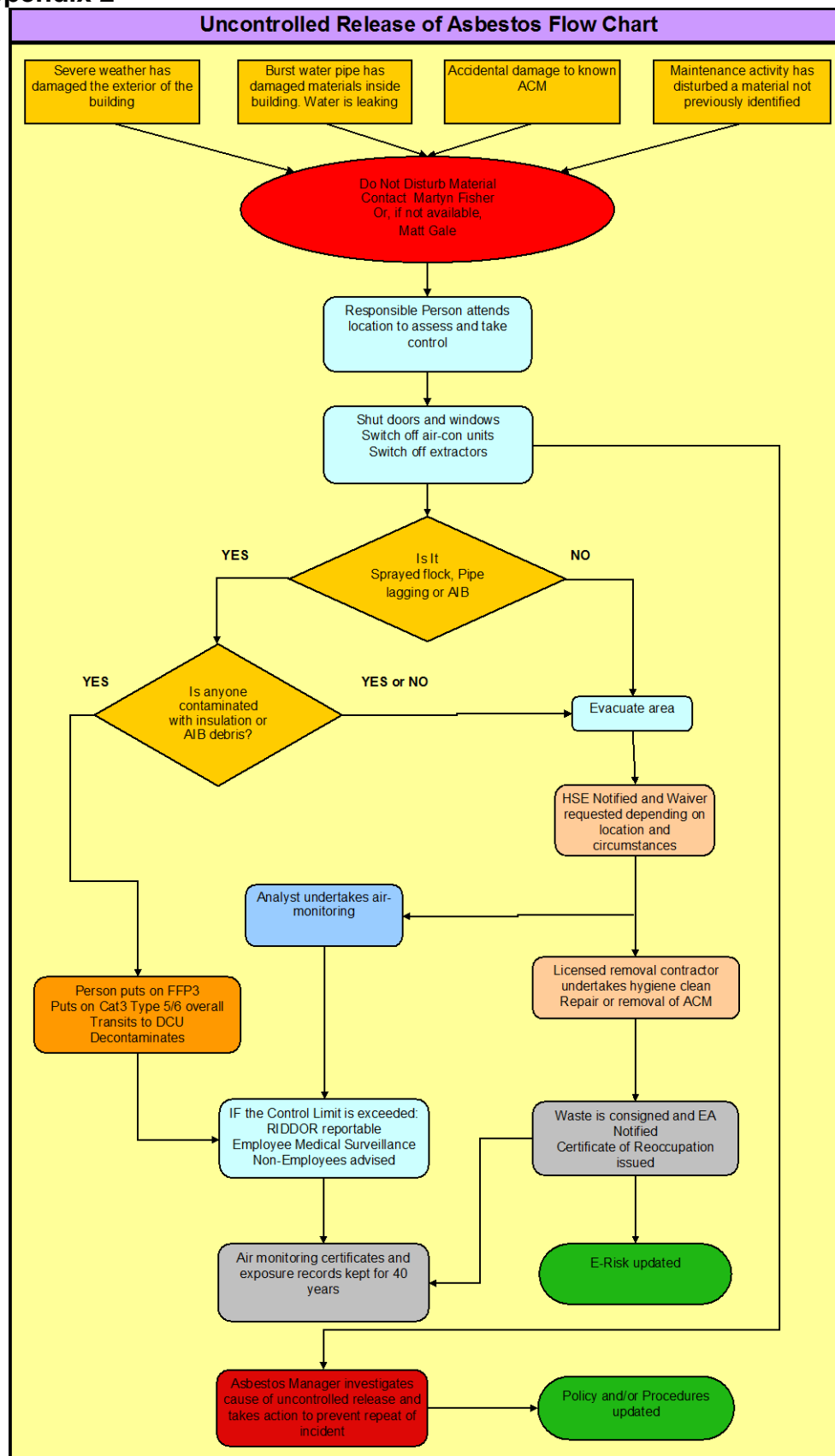
External audit may be conducted by independent asbestos consultants in response to a project –specific incident who shall report directly to the Director of Estates and whose findings shall be given due consideration and implemented.



## Appendix 1      Named Individuals – Roles and Responsibilities

Position	Name	Responsibility
<b>Duty Holder/Director of Estates</b>	Julian Robinson	<b>Legal duty of compliance reporting to ESC</b>
<b>Directors of Facilities Management, Capital Development and Residences &amp; Catering</b>	Allan Blair Ken Kinsella Ian Spencer	<b>Main contact for FM services, major construction works and Halls of Residences</b>
<b>Head of Health and Safety</b>	Mel Boucher	<b>Main contact for investigations. Appointed officer for outbreaks.</b>
<b>Asbestos Manager</b>	Martyn Fisher	<b>Draft, implementation and update of the policy. Ensures that the Estates team implement the Policy and Plan.</b>
<b>Deputy Asbestos Manager</b>	Tony Lobo	<b>Deputises above functions</b>
<b>Head of Maintenance</b>	Paul Franklin	<b>Day-to-day responsibility for all maintenance</b>
<b>Maintenance Supervisor</b>	Malcolm Callendar	<b>Day-to-day responsibility for the campus</b>
<b>Project Managers, Residences Managers, Facilities Managers and IT staff</b>	Barbara Moldawa Nick Garwolinski Gabija Bingelyte Emma Lovegrove Phil Newsham Jackie Woodley Bally Nandra Steve Ryan Ed Spick Martin Slade David Skeen Dan Roberts Mike Betts	<b>Day-to-day responsibility for construction projects and FM Services</b>
<b>Asbestos Consultant</b>	GBNS Santia	<b>Surveys, air-monitoring, Training</b>

## Appendix 2



### Appendix 3 References

1. *The Health and Safety at Work etc, Act 1974* The Stationery Office 1974
2. *The Management of Health and Safety at Work Regulations 1999 Approved Code of Practice and guidance L21 (second edition)* HSE Books 2000
3. *The Workplace (Health, Safety and Welfare) Regulations 1992* SI 1992/3140 The Stationery Office 1992
4. *The Construction (Design and Management) Regulations 2007* SI 1994/3140 The Stationery Office 1994
5. *The Control of Asbestos Regulations 2012* SI 2012/632 The Stationery Office 2012 ISBN 978 0 11 152108 3
6. *Managing and working with asbestos. Control of Asbestos Regulations 2012. Approved Code of Practice and Guidance L143 (second edition)* HSE Books 2013 ISBN 978 0 7176 6618 8
7. *The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013*
8. *Asbestos: The survey guide* HSG 264 HSE Books 2012 2<sup>nd</sup> edition ISBN 0 7176 2076 X
9. *A comprehensive guide to managing asbestos in premises* HSG227 HSE Books 2002 ISBN 7176 2381 5