



THE UNIVERSITY *of* EDINBURGH

ASBESTOS MANAGEMENT PLAN: 2024-25

The University of Edinburgh has a statutory duty to provide a safe place of work and a healthy working environment, so far as is reasonably practicable. We understand these are essential elements of a successful organisation. We believe that excellence in the management of health and safety is a fundamental part of our collective success.

Contents

1. Overview

1.1 Introduction

2. Policy

2.1 Policy Statement

3. Organisation

3.1 Roles and Responsibilities

4. Identification of ACMs

4.1 Scope of Buildings

4.2 Management Surveys

4.4 Refurbishment and Demolition Surveys

5. Management Options

5.1 Priorities for Action

5.2 Strategy and Timescales

6. Management Control Measures

6.1 Work with or near ACMs

6.2 Labelling

6.3 Restricted Areas

7. Monitor and Review

7.1 Monitoring the Management Plan

7.2 Reviewing the Management Plan

8. Information Management

8.1 Overview

8.2 Asbestos Register – Storage and Release of Information

8.3 Asbestos Register – Application and Use

8.4 Implementation of new procedures

8.5 Updating the Asbestos Register and Management Plan

9. Asbestos at Work

9.1 Review and Consultation

9.2 Maintenance Activities

9.3 Project Activities

10. Training and Awareness

10.1 Overview

10.2 Training

Appendix A – Emergency Procedures

- A1 If suspect material is discovered
- A2 Known or suspected asbestos material is damaged during works
- A3 Urgent access to an asbestos work area
- A4 Records of Exposure

Appendix B – Work with ACMs

- B1 Asbestos Removal – Project Pathway and Planning
- B2 Licensable work
- B3 Non licensable work
- B4 Non-removal of Asbestos during Building Work
- B5 Discovery of Asbestos during Project Works

Appendix C – Asbestos Management Improvement Plan

- C1 Asbestos Management Improvement Plan

Appendix D – Health and Safety Management Team Areas of Responsibility

1. Overview

1.1 Introduction

The University, as a property owner and the custodian of a large and diverse estate, inevitably has some buildings built or refurbished using asbestos containing materials.

Anyone who owns, occupies, manages or has responsibilities for non-domestic premises that may contain asbestos, has a legal duty to manage the risk from this material; or a duty to co-operate with whoever manages that risk.

The Duty to Manage (Regulation 4 of The Control of Asbestos Regulations 2012) is about protecting everyone (especially maintenance workers) from uncontrolled exposure to asbestos fibres. The University has concentrated dedicated resources to realistic, good practice, steps towards achieving this. In many cases this 'good practice' goes further than the requirements of the regulations and official guidance to ensure that our buildings are asbestos safe.

If Asbestos Containing Materials (ACM) are in good condition and left undisturbed, fibres will not get into the air where they can be breathed in. The presence of **asbestos-based material does not in itself constitute a danger**, however, it is hazardous when disturbed or damaged and must be carefully managed.

Staff and general contractors (other than specialist asbestos contractors) are not expected to work with, or be exposed to, asbestos on University premises. A limited number of employees whose normal duties may bring them into contact with existing asbestos materials (e.g. building maintenance staff) will be trained to recognise the possibility of its presence and how to apply the relevant controls.

Your comments and questions are welcome please contact the Estates Health and Safety Team at Estates.safety@ed.ac.uk or 0131 650 2797.

2. Policy

2.1 Policy Statement

The University of Edinburgh recognises its duty to provide a safe place of work and a healthy working environment. We understand how these are essential elements of a successful organisation. We believe that excellence in the management of health and safety is a fundamental part of our collective success.

The Estates Department will take appropriate action to ensure the health and safety of staff, students and others who may be affected by the risks associated with asbestos containing materials in building structures and plant within the University estate.

University policy is:

1. To prevent, as far as is reasonable practicable, exposure to asbestos;
2. To provide and maintain an asbestos register of all known Asbestos Containing Materials (ACMs) within the Estate;
3. To implement an effective and positive asbestos management strategy, based on risk assessment, to ensure that all asbestos containing materials will be maintained in a safe condition;
4. To take opportunities that arise through refurbishment projects to remove ACMs on an ongoing basis;
5. To direct resources that can be used effectively, in a planned and strategic manner;
6. Only engage appropriately trained, qualified and competent persons to undertake any work with ACMs (including management, surveying, remediation and removal).
7. To freely provide information on asbestos containing materials to those undertaking work on University properties;
8. To promote awareness of **shine**Asbestos, the University Asbestos Management System;
9. To maintain the momentum in development of expertise and best practice;
10. To regularly review the Asbestos Management Plan.

This Policy has been drawn up in accordance with the latest Regulations, Approved Codes of Practice and Guidance from the Health and Safety Executive and will be reviewed and updated in the light of any future changes to these Regulations, Approved Codes of Practice or Guidance.

3. Organisation

3.1 Roles and Responsibilities

Everyone has a duty to cooperate. As well as the specific roles outlined below everyone will:

1. Take reasonable care for the health and safety of themselves and others (including members of the public) who may be affected by what they do or fail to do at work;
2. Attend any health and safety training deemed appropriate;
3. Comply with this Management Plan;
4. Disseminate information about asbestos to staff and contractors under their control by requesting information from the Estates Health and Safety Team or **shine**Asbestos system and the implementation of their subsequent recommendations;
5. Report any suspected asbestos materials or damage to any known asbestos containing materials to the Estates Health and Safety Team.

3.2 The Director of Estates is responsible for:

1. The overall strategy for the safe operation and execution of Estates Department activities including legislative compliance with regards to asbestos.
2. Executing the principle functions of asbestos management by assembling and maintaining a suitably qualified Health and Safety Management Team consisting of staff and consultants/contractors.
3. Ensuring adequate staff and resources to implement the Management Plan.

3.3 The Estates Senior Management Group (EMG):

1. Formally accepts their collective and individual role in providing health and safety leadership within Estates Department.
2. Will make sure that all decisions take account of any asbestos implications.
3. Will, in addition to considering health and safety issues as a standing item, receive formal written reports on asbestos management as and when necessary.

3.4 The Director of Estates Development and the Director of Estates Operations will be responsible for:

1. Ensuring that staff under their control include within the project cost plan sufficient resources to deal with asbestos related issues.
2. Ensuring that staff under their control engage in regular consultation with the Estates Health and Safety Team.
3. Ensuring that staff under their control have suitable and sufficient training with respect to asbestos issues.
4. Ensuring that managers are aware of their own limitations and that they seek advice from the Estates Health and Safety Team and act upon such advice.
5. Ensuring that all works where an asbestos survey or removal work is required is overseen by an Asbestos Project Manager.

3.5 Head of Estates Planning/Head of Construction/Head of Minor Projects will be responsible for:

1. Ensuring that all asbestos removal and remediation works are carried out in consultation with the Estates Health and Safety Team.
2. Assessing areas prior to project start to identify any known risk from asbestos by consulting the **shine**Asbestos system and/or an Asbestos Project Manager and ensuring an appropriate level of survey is carried out.
3. Implementing the recommendations of the Head of Estates Health and Safety, his Depute or the Asbestos Project Manager.
4. Ensuring that only surveyors and analytical consultants on the University Framework are engaged to carry out survey or monitoring of asbestos work;
5. Providing information to consultants and contractors on the location of any known asbestos affecting the project.
6. Ensuring accurate drawings, including updates and amendments, indicating all areas of intrusive work to the building fabric are supplied to the Estates Health and Safety Team for informing the extent of any asbestos survey works.

3.6 Head of Maintenance Operations, Head of Building Services, Head of Support Services, Head of Energy and Utilities Management will be responsible for:

1. Ensuring that staff under their control have suitable and sufficient training with respect to asbestos issues.
2. The implementation of this Management Plan and attendant procedures.
3. The asbestos safe management and maintenance of premises and resources used by their team.

3.7 Maintenance Contract Services Staff, Building Services Staff & Energy staff are responsible for:

1. Ensuring that the staff under their control include within the financial and operational plan for maintenance/upgrade operations sufficient resources to deal with asbestos related issues.
2. Ensuring that staff and contractors under their control have suitable and sufficient training with respect to asbestos issues.
3. Have operational responsibility for the implementation of this Management Plan. In particular they must ensure that suitable and sufficient arrangements are maintained for the management and control of contractors and that arrangements are in place for the dissemination of asbestos information.

3.8 Maintenance Services Staff are responsible for:

1. Requesting information on the presence of asbestos in their work areas.
2. Assessing areas prior to starting work to identify any asbestos risks.
3. Have operational responsibility for the implementation of this Management Plan. In particular they must ensure that suitable and sufficient arrangements are in place for

the dissemination of asbestos information with particular emphasis on the Direct Labour staff.

4. Stopping work immediately if a suspect asbestos material is discovered or damage is found or caused to asbestos materials during the course of work and seeking advice from the Estates Health and Safety Team.
5. Passing information on to colleagues and contractors of the location of any known asbestos in the work area.
6. Attending any Health and Safety training provided.

3.09 Estates Managers (Let Property) are responsible for:

1. Managing, acquiring and disposing of the University's property portfolio taking account of University asbestos procedures and current legislative guidance.
2. Ensuring regular consultation with the Health and Safety Management Team regarding asbestos legislative compliance.
3. Providing information to consultants and contractors on the location of any known asbestos affecting their work.

4. Identification of ACMs

4.1 Scope of Buildings

There are currently 550 buildings/structures within the University estate; these are a mixture of freehold, leasehold and informal occupation arrangements with third parties. Where the University owns, controls or maintains the building fabric and engineering services, the University is the duty holder for ensuring compliance with the Control of Asbestos regulations.

Buildings currently outside the scope for the University as the Duty Holder are those buildings for which the University Estates Department are not responsible for maintaining including;

- NHS Lothian Buildings;
- Leasehold/tenanted buildings where the University are not the Duty Holder and do not have maintenance or repair obligations for the building fabric or building engineering services/infrastructure under the lease agreement; and
- Domestic Premises where the University is **not** the landlord.

The University will, where appropriate, ask external duty holders to make asbestos information available and will cooperate with other duty holders as and when required.

4.2 Management Surveys

CAR 2012 Regulation 4 The management of asbestos in non-domestic premises (includes University student accommodation)

A management survey is the standard survey required to enable the University to create an asbestos register as required under the above regulation. Its purpose is to locate, as far as reasonably practicable, the presence and extent of any suspect ACMs in a building which could be damaged or disturbed during normal occupancy, including foreseeable maintenance and installation, and to assess their condition.

The Head of Estates Health and Safety or Depute are responsible for commissioning all surveys. The minimum standard to be adopted is described in *HSG 264 Asbestos – The Survey Guide*; the surveys will be undertaken and reported by a UKAS-accredited consultant, in accordance with HSE guidance.

The Asbestos Project Manager will undertake operational responsibility for planning and managing survey work across the estate.

Buildings constructed prior to the year 2000 will be subject to a management survey.

Buildings constructed after 2000 will not require a survey; building users must ensure that any equipment which may contain asbestos i.e. ovens/incubators etc. are identified to the Health and Safety Management Team.

4.3 Intrusive works

Regulation 5 – Identification of the presence of asbestos

Where the University is to undertake work in demolition, refurbishment or maintenance, those originating and/or undertaking that work must make a suitable and sufficient assessment as to whether asbestos is likely to be present. A management survey is VERY unlikely to provide sufficient information to satisfy this requirement, particularly where intrusive works are planned.

Where any intrusive work is planned in a building constructed before 2000 the Estates Health and Safety team MUST be consulted.

The Estates Health and Safety team will assess the quality and extent of existing information and decide whether it is suitable and sufficient to permit the proposed work to proceed. Where it is not sufficient, they will instigate further survey work. The Health and Safety team are the sole authority for undertaking such assessments.

4.4 Refurbishment and demolition surveys

A refurbishment and demolition survey is needed before any intrusive work to the fabric of the building is carried out. This type of survey is used to locate and describe, as far as reasonably practicable, all ACMs in the area where the refurbishment work will take place or in the whole building if demolition is planned. The survey will be fully intrusive and involve destructive inspection, as necessary, to gain access to all areas, including those that may be difficult to reach. A refurbishment and demolition survey may also be required in other circumstances e.g. when more intrusive maintenance and repair work will be carried out or for plant removal or dismantling.

Refurbishment surveys are based on the scope of the refurbishment project and as such are only as intrusive as necessary for the scope. Changes to the extent of work should be communicated to the Estates Health and Safety Team for review and possible additional survey work planned.

Surveys will be commissioned by the Estates Health and Safety Team through approved framework consultants accredited by the United Kingdom Accreditation Service (UKAS) as complying with ISO17020 – for undertaking surveys for asbestos containing materials.

5. Management Options

5.1 Priorities for Action

The asbestos risk assessment, carried out during the management survey, includes a material assessment and a priority assessment; scores are assigned using the HSE's algorithms.

For management purposes, asbestos identified following assessments is categorised based on the risk assessment score.

Category A. Risk Assessment scores equal to or greater than 17

- In some circumstances immediate plans for remediation or isolation of the ACM concerned should be implemented.

Category B. Risk Assessment scores 13-16 inclusive

- In these situations, it may be necessary for the ACM to be removed on a programmed basis; emergency repair and sealing operations should be undertaken where any deterioration or damage occurs.

Category C. Risk Assessment scores 8-12 inclusive

- Materials within this category should be inspected on a yearly basis to ascertain any change in circumstances which could require re-assessment of priority rating.

Category D. Risk Assessment scores less than 8

- Materials within this category should be inspected on a 2 yearly inspection cycle to ascertain any change in category.

5.2 Strategy and Timescales

Where ACMs are in a safe condition and are unlikely to be disturbed they will be left in situ. They will be inspected regularly at intervals determined by the Estates Health and Safety Team. This will typically be every twelve months but may be less or more based upon risk assessment.

Some of the management options described below will need to be taken together for some ACMs; management decisions will be made by the Estates Health and Safety Team using all relevant information and based on the principles outlined in HSE guidance.

A Licensed Asbestos Removal Contractor will undertake all work with ACMs. Air monitoring and certification requirements will be decided by the Estates Health and Safety Team and undertaken by the University Framework Consultant for analytical work.

5.2.1 Monitoring the condition of ACMs

ACMs that are in good condition, sealed, and are unlikely to be disturbed, will be left in place.

The time between re-inspection will vary depending on the type of ACM, its location and the activities in the area concerned. ACMs in remote locations, with little or no routine activity, or materials that pose little likelihood of fibre release such as mastics and sink pads, will be inspected less frequently.

Re-inspection involves a visual check, looking for signs of disturbance, scratches, broken edges, cracked or peeling paint and debris. Where deterioration has occurred, a recommendation on what remedial action to take will be made. This may be a case of resealing the surface of the ACM, but if there is evidence that the ACM is being disturbed on a frequent basis, the decision may be made to remove it or at least protect it by putting up a suitable barrier after clearing any visible debris.

The reason for the constant disturbance will also be investigated. Employees are encouraged to report any new damage to ACMs that they become aware of.

5.2.2 Seal or encapsulate the ACM

Encapsulation of an ACM is only deemed a suitable action if the ACM is in sound condition and can take the additional weight of the encapsulant without delamination.

5.2.3 Repair the ACM

In order to be suitable for repair, the damage must be slight; therefore repair will be restricted to patching/sealing small areas and making good slight damage.

ACMs that are unsealed, while not damaged, will be treated with a sealant to prevent deterioration of the exposed surface as soon as is reasonably practicable.

5.2.4 Remove the ACM

Where highly damaged ACMs have been identified, or if ACMs are in a vulnerable position and liable to damage, the above management options will be explored first; where it is not practical to repair or encapsulate the ACMs, they will be removed as soon as is reasonably practicable.

In the case of refurbishment or demolition and in accordance with the requirements of Regulation 7 (CAR 2012) ACMs will be removed before any other major work begins.

6. Management Control Measures

6.1 Work with or near ACMs

If building, project or maintenance work has the potential to disturb ACMs those materials will normally be removed prior to work commencing.

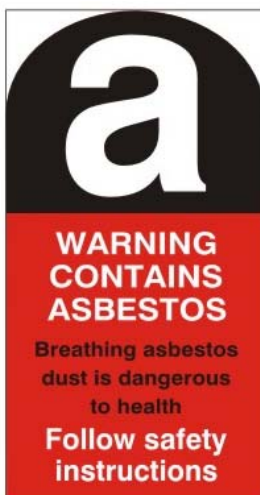
In exceptional cases removal may prove impracticable, in such cases any works directly involving disturbance of ACM must be undertaken by a Licenced Asbestos Contractors under controlled conditions and in accordance all health and safety and University regulations, guidance and procedures. This may involve the sub-contracting of small sections of otherwise specialist work to a Licenced Asbestos Contractors e.g. electrical conduit attachment to asbestos insulating board.

Where it has been identified that work with asbestos containing materials needs to be undertaken the procedures in Appendix B should be followed.

6.2 Labelling

Warning labels or appropriate signage will be applied to ACMs considered to be a significant risk where this is deemed to help prevent accidental damage, and not cause undue concern.

Lower risk materials such as floor tiles, textured coatings, cement materials will not be routinely labelled but adequate steps will be undertaken to raise site awareness of their presence.



If an asbestos label is present, it must be assumed that ACMs are present. Conversely, depending on location, the absence of a label does not mean that ACMs are not present. **If in doubt, ASK.**

The use of local warning signs and labels can be beneficial in decreasing the chance of inadvertent damage and exposure. However labelling may not always be considered, particularly where they may cause anxiety to the building occupants.

The Asbestos Register (**shine**Asbestos) is the primary resource for recording the locations of ACMs and **must** still be consulted on every occasion when intrusive work is proposed.

6.3 Restricted Access

Where ACMs are identified in poor condition the Estates Health and Safety Team may require the area to be isolated or access restricted to selected personnel/work activities

until such time as remediation work can be undertaken. In these circumstances warning signage will be placed on all access positions with instructions for the Estates Health and Safety Team to be contacted if access is required; areas affected by restrictions will be reported to the relevant managers.

7. Monitor and Review

7.1 Monitoring the Management Plan

The Head of Estates Health and Safety, Deputy Head of Estates Health and Safety and the Director of Estates Operations will meet three times a year to formally monitor the plan.

The Deputy Head of Estates Health and Safety will attend the bi annual Estates Health and Safety Committee meetings and update the group on asbestos management.

7.2 Reviewing the Management Plan

The management plan will be formally reviewed and updated (as necessary) every year by the Estates Health and Safety team and others as appropriate. This review may consider:



EFFECTIVENESS

- In preventing exposure
- In controlling maintenance workers/contractors
- In highlighting the need for action to repair/remove ACMs
- In raising awareness among all employees



ISSUES

- Changes to the organisational structure and/or staff
- Resourcing the management plan
- Changes to company procedures; and
- Changes in building use/occupancy/refurbishment plans



FAILURES

- Where procedures have not been followed and why not
- Where procedures have been inadequate and why
- Where uncontrolled exposure to airborne fibres above the control limit has occurred

8. Asbestos Information

8.1 Overview

The University has a duty to provide contractors, and their employees, with information about asbestos that such persons cannot reasonably be assumed to be aware of.

The University will exercise this duty in the following ways:

1. Ensuring that all employees and contractors are supplied with relevant information on the presence of asbestos from the Estates Health and Safety Team or the person responsible for instructing the work (order originator).
2. Providing suitable and sufficient training with respect to asbestos issues;

8.2 Asbestos Register - Storage and Release of Information

The **shineAsbestos** system is an online, live asbestos management system which contains the asbestos registers for the estate. The **shineAsbestos** system is updated and maintained by the Estates Health and Safety Team and is populated by:



8.3 Asbestos Register - Application and Use

The system is designed to be used by all appropriate staff in the following ways, **enquiries for asbestos information can also be made directly to the Estates Health and Safety Team:**



Operations and maintenance personnel for carrying out risk assessments prior to undertaking non-intrusive works.



Operations and maintenance personnel for carrying out risk assessments and asking for further investigation prior to undertaking business as usual and minor works with an intrusive nature e.g. installing new light switch, repairing windows and doors, access to services behind partitions and ceilings, replacing leaking radiator, installation of IT and security devices and equipment etc.



Estates Project Managers, in conjunction with Estates Health and Safety Team to evaluate and determine the risks of ACM's at the early stages (pre-construction) of their projects.



Estates Health and Safety Team use the system for mini tendering, project management, document control, management information reports, budgeting, audits, training and contractor performance related activities.

Access to the **shine**Asbestos system shall only be available through the Estates Health and Safety Team.

Where the asbestos status of a building or area is unknown colleagues and contractors should seek advice from the Estates Health and Safety Team.

The audit trail on the **shine**Asbestos system will be utilised periodically and during incident investigation to ensure compliance with this Management Plan.

8.4 Implementation of new procedures

Proposed new procedures will be discussed by the Head of Estates Health and Safety, the Deputy Head of Estates Health and Safety and Director of Estates Operations as part of the ongoing review process.

Any proposed new procedures will be endorsed by the Estates Management Group and consulted on via the Health and Safety committee.

Revised procedures will be publicised by the Estates Health and Safety team

8.5 Updating the asbestos register and management plan

The **shine**Asbestos system provides 'live' information and only the Estates Health and Safety Team will update or modify the data.

In order to ensure consistency and confidence that these 'live' documents are accurately maintained all University led asbestos removal works must be managed by an Asbestos Project Manager.

Updated copies of drawings and photographs will be held by the Estates Health and Safety Team, and elsewhere as appropriate. Copies of certificates of analysis and certificates of asbestos removal and or remediation will be stored within the **shine**Asbestos system

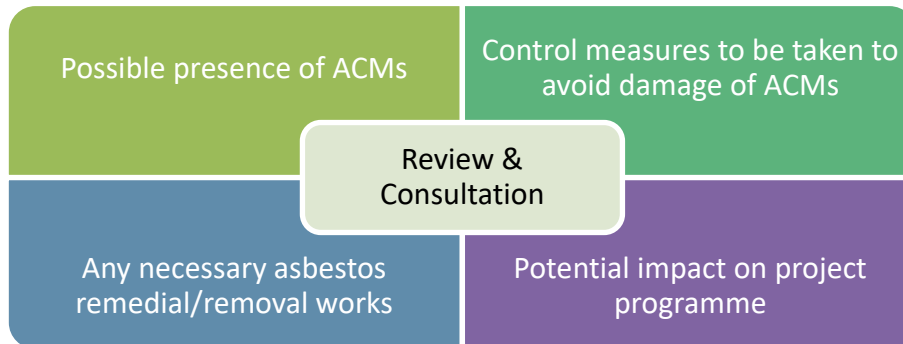
The Asbestos Management Plan and Policy will be updated annually (as necessary following the annual review). The Head of Estates Health and Safety will be responsible for all amendments and ensuring that the most up to date information is published.

Copies of all site paperwork produced by remediation work will be held by Estates Operations for a period of at least 10 years. Personal monitoring records and records of asbestos incidents will be kept for at least 40 years.

9. Asbestos at work

9.1 Review and Consultation

All works within the University Estate with the potential to alter or damage the fabric of the building, service voids, building services etc. must be reviewed with regard to:



The purpose of the assessment is to ensure that proper consideration has been given to the scope of the proposed works, to establish the extent of the potential risks in order that proper consideration is given to the legal provisions that apply and to determine the most appropriate work methods to comply with legal duties.

This review must be carried out in consultation with the Estates Health and Safety Team at an early stage of the project to allow sufficient time for project implications of ACMs to be considered.

9.2 Maintenance Activities

The majority of work undertaken is not intrusive in nature and ACMs are unlikely to be disturbed. Nevertheless the University has a duty to inform employees and others who may work in the vicinity of ACMs of their presence.

All those allocating or undertaking maintenance work in buildings constructed before 2000 must check the asbestos register before starting work as part of the risk assessment for that activity – See Table 1 for process.

It is important that all those allocating or undertaking maintenance activities recognise the limitations of the asbestos register and also understand the impact of their activities on the fabric of the building.

Where any work is to be undertaken in a building constructed before 2000 that is likely to be intrusive in nature the Health and Safety Management Team should be consulted.

IF IN DOUBT STOP AND ASK.

Table 1 – Normal Workflow

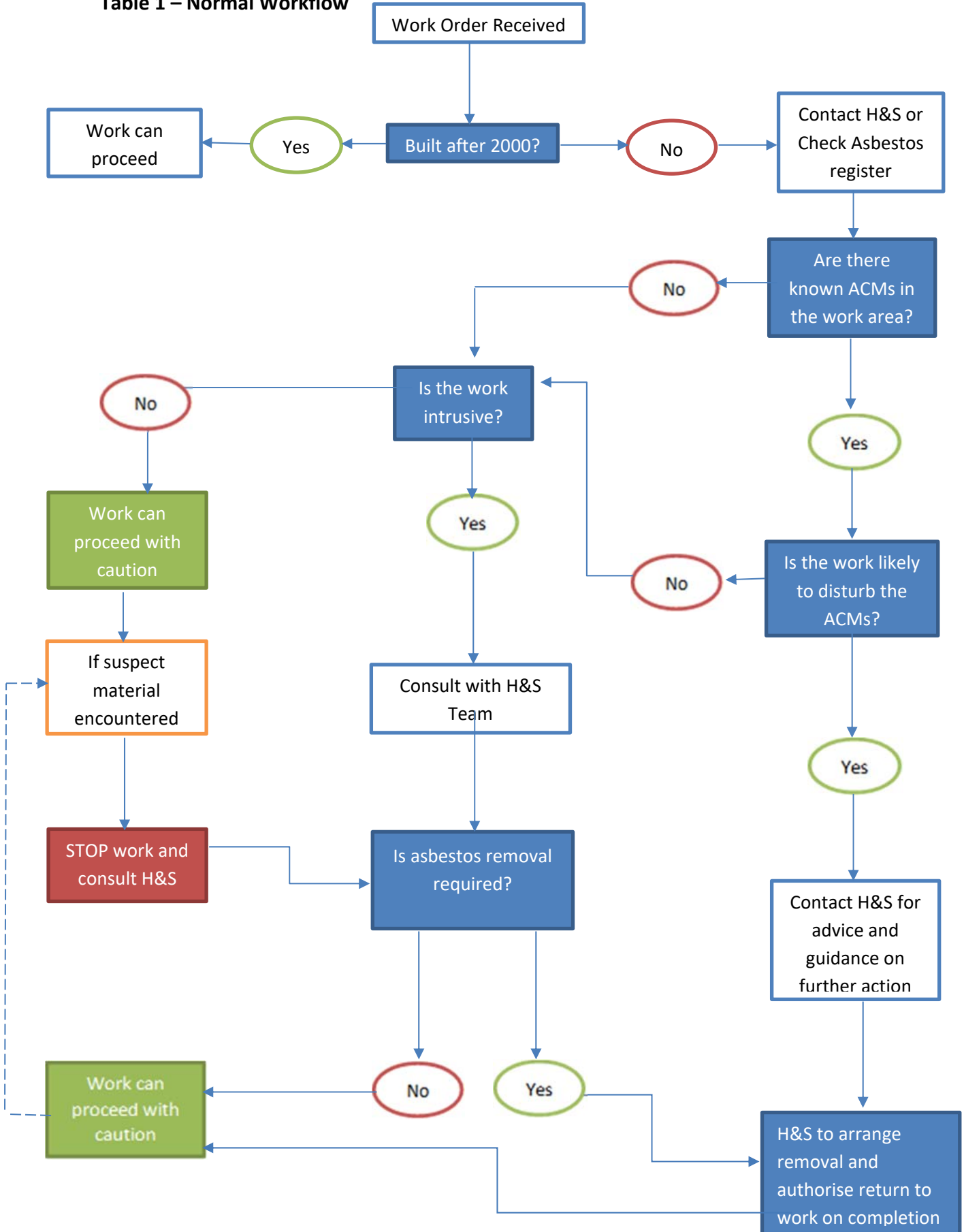
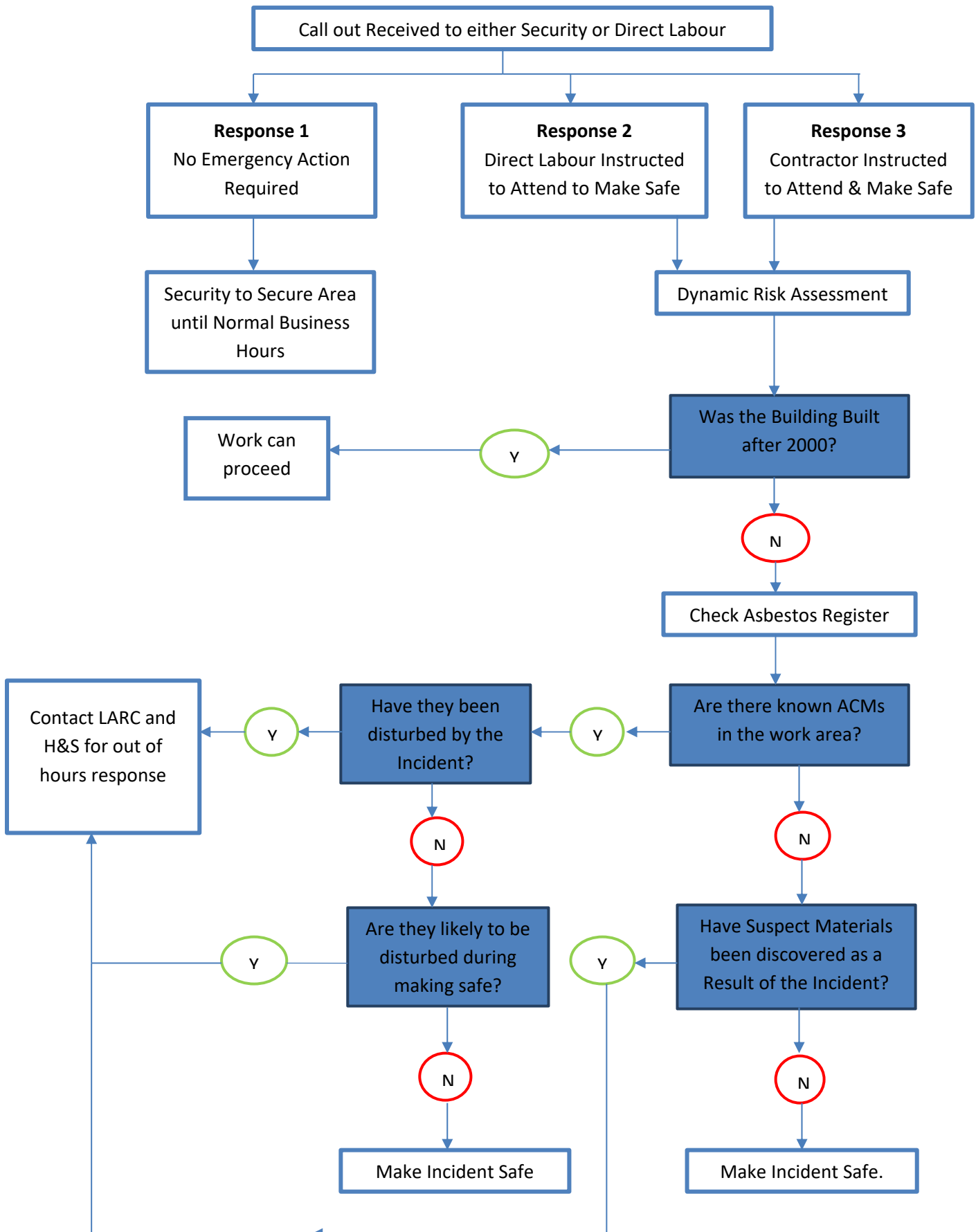


Table 2 - Out Of Hours Workflow



9.3 Project Activities

For all major building work, the commissioning of an asbestos survey is essential. This includes the site investigation of proposed new builds. Examples of major building works:

Capital Projects

- Remodelling floors and buildings
- New Build (site investigation)
- Teaching space upgrades
- Office refurbishments etc.

Strategic Maintenance Projects

- Engineering plant and equipment replacements
- Electrical rewiring
- Upgrade of controls and switch gear
- Fire alarm improvements etc.

Security upgrades & improvements

- Door access systems
- CCTV installations etc.

IT upgrades & improvements

- New data points
- IT cabling, telecommunications wiring etc.

A Management survey will normally have been carried out to ascertain the location of asbestos likely to be disturbed during normal operations. It will be necessary to carry out a Refurbishment/Demolition survey on areas where the building fabric is to be modified.

Care needs to be taken to ensure all areas of proposed works are inspected i.e. wiring work (for electrical supplies, computer cabling or fire alarm systems) might extend beyond the area of the 'building work'.

Early consultation with the Estates Health and Safety Team is essential.

The costs of undertaking refurbishment/demolition surveys and the removal and/or remediation of asbestos should be included in project budgets.

Where it has been identified that work with asbestos containing materials has to be undertaken the procedures in Appendix B shall be adhered to.

10. Training and Awareness

10.1 Overview

Through training and awareness sessions, the University aim to have an open and responsive culture where employees are not afraid of asbestos and know how it is managed in their place of work.

Training will be designed to match the requirements of the individual attendees and will include, where appropriate, practical task specific training.

All training will be recorded on the Employee Training Manager Database and where appropriate will include a form of assessment which can be used to highlight future training needs.

10.2 Training

Induction training for Estates Department new starts (those likely to come into contact with ACMs or instruct/manage work in buildings containing asbestos) will be conducted on a regular basis by line managers.

Estates Department new starts will be given basic information and emergency contact details as part of their initial orientation by their line manager.

Asbestos awareness training and refreshers will be given to all appropriate Estates Department staff.

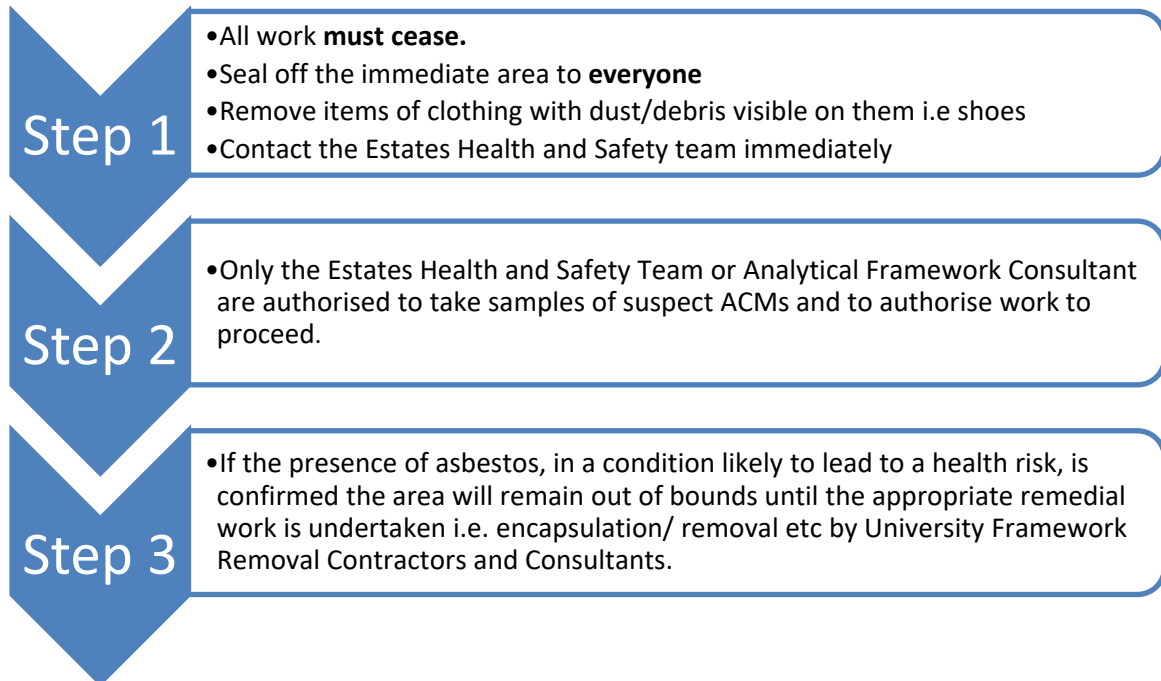
Other relevant groups, including IT, telecoms etc. will receive awareness training appropriate to their roles.

Information, Instruction and Training takes many forms and includes, classroom based presenter lead sessions, online self-taught, seminars, toolbox talks, legal briefings, group text messages, handouts and consultations.

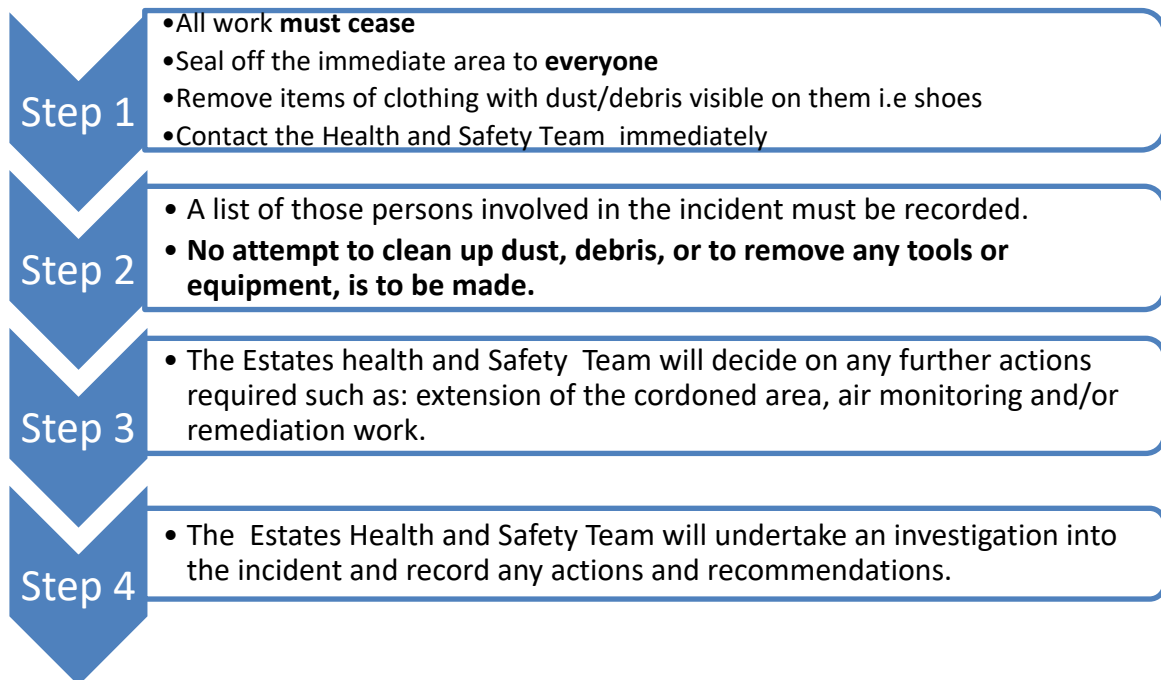
Appendix A

Emergency Procedures

A1. If suspect asbestos material is discovered



A2. Known or suspect asbestos material is damaged during works



A3 Urgent access to an Asbestos Work Area

In the case of an emergency (medical, services, safety etc.) only those who have received training, are properly protected, and are under the supervision of the Licensed Asbestos Contractor will be allowed entry into an asbestos enclosure.

In all cases where access may be required contact the Estates Health and Safety Team and follow their advice.

A4 Records of Exposure

Where exposure occurs above the CAR Control Limit, reporting of the incident to the HSE under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR) will be assessed and carried out by the University Health and Safety Department.

Incidents of potential exposure to asbestos should be reported as incidents on the Health and Safety Department's web based accident, incident reporting system.

<https://www.ed.ac.uk/health-safety/accident-reporting>

Where the incident area is under the control of a Principal Contractor the reporting requirement is likely to be part of their responsibilities.

Records of exposure must be kept for 40 years.

Appendix B

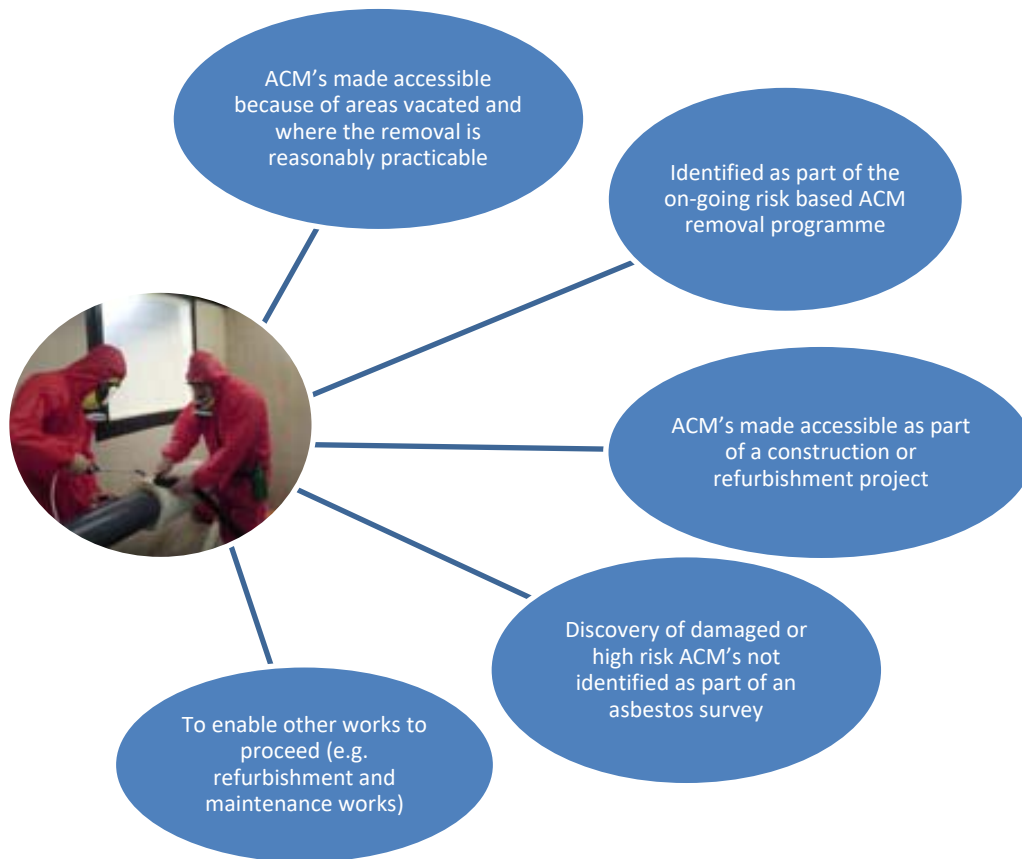
Asbestos Removal

B1. Asbestos Removal – Project Pathway and Planning

The policy of the University is to take the opportunity on an on-going basis to remove asbestos from its buildings and an opportune time for this is as part of refurbishment or other building work. **There is a strong presumption for removal.**

“In the case of demolition or major refurbishment, the plan of work must specify that all asbestos is removed before any other major work begins, where this is reasonably practicable and does not cause greater risk to employees than if the asbestos had been left in place”. (CAR 2012)

ACM’s are removed as a result of one or more of the following:



In line with Regulation 7 of CAR, removal should take place prior to the commencement of the building or refurbishment work. However it is recognised that in some instances the asbestos removal may be required to take place on a phased basis

Appendix B

Asbestos Removal

The following planning procedures must be followed for all asbestos works:



Appendix B

Asbestos Removal

B2. Licensable work

Only Licenced asbestos removal contractors will be engaged to work with asbestos on University premises, and only the framework analytical consultancy will undertake air monitoring and clearance work.

The Licensed Asbestos Contractor , must provide a copy of the method statement, risk assessments and notification for comment by the appointed Asbestos Project Manager and analytical company prior to work starting on site.

Any change in the scope of the removal work or deviation from the method must be approved by the appointed Asbestos Project Manager before work begins.

The Asbestos Project Manager will appoint the analytical consultant to monitor and oversee the works as appropriate.

For larger scale and/or complex works an asbestos strategy for the project needs to be employed –

In projects where asbestos is removed on a phased basis the Asbestos Project Manager will liaise with the Principal Contractor to ensure all removal work is carried safely.

Any member of the Estates Health and Safety Team will, at their discretion, undertake site visits in order to liaise with the Analyst and/or the Contractor's representative.

A copy of the clearance documentation will be held by the Estates Health and Safety Team within the **shine**Asbestos system

B3. Non licensable work

In exceptional circumstances and at the sole discretion of the Estates Health and Safety Team Non-framework contractors may be permitted to remove ACM's which fall into the category of non-licensed work (very minor works, with minimal risk of fibre release, are involved e.g. those tasks which are defined in CAR as short non-continuous maintenance activities with sporadic and low intensity worker exposure such as those detailed in HSE Guidance Asbestos Essentials) always provided that the requirements of the CAR are adhered to, and in particular, that published Guidance as regards methodology is followed.

A detailed method statement and risk assessment must be submitted to the Asbestos Project Manager prior to work commencing. Those designated to undertake such works must be familiar with the above Legislation and Guidance and have appropriate insurance to cover work with asbestos.

An example of such work would include the removal of asbestos containing fuse carriers by a suitably trained electrician or the removal of a toilet cistern intact.

Where larger scale works are involved (e.g. removal of asbestos cement roof) a licensed asbestos contractor must be engaged to undertake the works, this to ensure that the work is undertaken in a manner that ensures compliance with the requirements of CAR, including, under certain circumstances, the duty to notify the Enforcing Authority of such works.

B4. Non-removal of Asbestos during Building Work

Where a decision is taken by the University not to remove asbestos containing materials prior to undertaking building work then:



B5. Discovery of suspected ACMs during project works

There is always the possibility that even after carrying out a Refurbishment or Demolition survey, that ACMs may be discovered during the course of the work. If suspect material is discovered then the Emergency Procedures in Appendix A should be followed.

Appendix C

Asbestos Management Improvement Plan

C1 Asbestos Management Improvement Plan

The following table outlines the proposed improvement plan over the next twelve month cycle, commencing August 2017.

Asbestos management improvement plan

Action	Estimated completion
shineAsbestos development and impact of possible replacements	Ongoing
Re-inspection of known ACMs	Ongoing cycle
Review of original management surveys and selected re-surveys carried out for audit purposes.	During next 12 months
Remedial action following identification of areas of risk	Ongoing cycle
Support to Estates colleagues as defined in MP	Ongoing cycle
Support to project activities as defined in MP	Ongoing cycle
Update asbestos management plan Annually or as required.	Ongoing cycle

Appendix D

Estates Health and Safety Team Asbestos Responsibilities

Head of Estates Health and Safety

1. Responsibility for the University strategy and implementation of this management plan although operational responsibility is delegated to the Deputy Head of Estates Health and Safety
2. Coordinate the university response to asbestos related questions from the enforcing authorities, press, and others to include working within the framework of the Freedom of Information and Data Protection legislation.
3. Motivate, counsel and guide staff to optimise output, maintain high morale, and promote flexibility, teamwork, communication and versatility to ensure that skills and services available are capable of meeting changing needs.

Deputy Head of Estates Health and Safety

1. Development, implementation and continuous review and improvement of the University asbestos management plan, policy and system through the examination, interpretation and initiation of action on statutory regulations, codes of practice etc.
2. Management and maintenance of the University asbestos risk register including the development and implementation of a system for managing asbestos and the implementation of operational plans which contribute to the achievement of departmental and University objectives.
3. Accountable for the management of all asbestos projects associated with the delivery of the University Estates Strategy and 2025 Vision across all four zones.
4. Provide specialist, professional guidance, instruction and project management for all asbestos contracts and works. Comment on the feasibility of designs and specifications for Capital, Development, Major Replacement and small scale projects and co-ordinate the appropriate asbestos response.
5. Manage the procurement of all asbestos related services and the annual budget for asbestos to ensure strict financial control and value for money; to include the implementation of systems and procedures for monitoring standards of service delivery.
6. Design and deliver training for relevant University staff and external contractors as appropriate on asbestos related issues and University procedures.
7. Directly supervise and oversee the Asbestos Project Manager in the management and utilisation of framework contractors and consultants; to ensure best value for money and excellence in service provision to include monitoring standards of service delivery.

Asbestos Project Manager

1. Manage a series of asbestos projects ranging from small scale survey and removal work, minor and major project from feasibility to completion. Establish and lead the asbestos project team comprising of external consultants, client department representatives, Estates and other support group colleagues ensuring that aims and objectives are delivered within agreed parameters and procedures. Ensure the project brief is translated accurately, developed and delivered by the project team.
 2. Ensure each project is executed in line with Health and Safety Executive Approved Code of Practice (ACOP) and guidance notes , UKAS/industry established Guidance and any guidelines required by the University. Provide professional project monitoring interface between the construction professions, contractors, industry organisations. Set up and coordinate each project's communication between the user clients, external consultants and internal service providers. Ensure lines of communication are understood and that all necessary consultations take place at the appropriate stage. Facilitate seamless handover to clients; follow on contractors and in-house maintenance personnel.
 3. Advise on and contribute to the review and improvement of the University asbestos management plan and systems to ensure continued compliance with legislation, approved codes of practice and best practice guidance.
 4. Assist in the procurement of asbestos related services to ensure strict financial control and value for money while recognising that statutory compliance is the primary objective
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1. **Health and Safety Adviser** Carrying out re-inspections of all identified asbestos containing materials (ACM) at intervals determined by risk assessment and maintaining an up to date estate wide asbestos register to include ad hoc inspections, bulk sampling, space changes and removals.
 2. Ensuring the quality and consistency of entries made to the asbestos register to include undertaking audits of the data.
 3. Providing and interpreting building specific asbestos information to key contacts.
 4. Responsible for all asbestos records management to ensure the most up to date information is available and historic data is archived as required by statute.
 5. Delivering training on the **shine**Asbestos system to new staff and refresher training as required.