HEALTH & SAFETY SERVICES

MANAGEMENT ARRANGEMENTS

Asbestos Management Plan

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DOCUMENT STATUS

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1.0 INTRODUCTION

1.1 Objective

1.1.1 King's College London, as a responsible employer, owner and controller of premises, is aware of its legal duties owed to staff, students, building occupiers, contractors and others concerning the provision of safety related information on asbestos and its duty to manage asbestos within its premises.

1.1.2 The university has a structured, risk-based approach to the management and control of asbestos containing materials (ACMs) within its property portfolio to reduce the risk to its lowest practical level. This includes the use of licensed and accredited specialists, planned surveys and re-inspections and maintenance of comprehensive records.

1.1.3 The university recognizes the hazard of asbestos and the risks to health that it poses. Therefore, to fulfil its moral, social and legal obligations this asbestos management plan (AMP) has been developed and its effective implementation will minimize the risk of exposure to asbestos. This plan will be freely available on King's College London's website to all applicable staff including employee representatives and trade union safety representatives in addition to asbestos awareness training.

1.1.4 Known and presumed asbestos is assessed for condition status on a periodic basis and if identified as being in a poor condition or in a high-risk area e.g. exposed boards within high activity public access and/or circulation spaces will also be given immediate priority for treatment.

1.2 Scope

1.2.1 This AMP provides information, procedures and guidance relevant to the management and control of known or presumed asbestos containing materials to be present with the buildings for which the university is 'The Duty holder'.

1.2.2 King's College London has a range of buildings and this plan applies across the property portfolio with details on the buildings list currently located within Estates & Facilities "Procedure for Asbestos Management", EF-ASU-02-PR04.

1.2.3 Asbestos usage in UK was banned in 1999, as such all buildings where construction started post 2000 and evidence is available by way of statement are not considered to contain asbestos and will not be included within this AMP.

1.2.4 Buildings outside the scope of this plan include:

- NHS Trust Buildings
- Leasehold/tenanted buildings where the university is 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.

1.2.5 To enable the Duty Holder to discharge its responsibilities under current legislation, this document describes the requirements and procedures for dealing with asbestos. This plan covers:

- The appointment of a Senior Technical Compliance Manager - Asbestos, (acting as an Asbestos Co-ordinator), Technical Compliance Manager and Technical Compliance Officer working within the Estates & Facilities Technical Compliance Team.
- The establishment of parameters for the evaluation and assessment of all suspect or confirmed ACMs
- The requirement to maintain an asbestos register in which a record is kept of the location and condition of identified or presumed ACMs at each site and including details of where asbestos has been removed.
- The production of an asbestos action plan (based on the register)
- The prevention of exposure to asbestos fibres
- Control of work with asbestos
- The provision of the periodic re-inspection and review of all ACMs
- The actions to be taken when there is a risk that asbestos fibres have been released into the atmosphere
- The development of a communication plan via regular meetings (New Proposed Asbestos Risk Compliance Group planned for 2022)
- The promotion of the Asbestos Management Plan through training and induction of staff, maintenance and contractors etc.
- The review and update of the Asbestos Management Plan and associated procedures.

1.2.6 Any asbestos-related issues associated with King's College London owned/leased property, including the removal, encapsulation, transport, and disposal or otherwise potential disturbance of asbestos materials, shall be performed in accordance with all relevant Acts, Regulations, advisory standards, Approved Codes of Practice and industry standards, including, but not limited to, those listed in **References**.

1.3 Related Documentation

Forms

F061 **Emergency notification of suspected asbestos containing material**

F062 **Asbestos Information Request**

F063 **Employee Training & Acknowledgement**

F064 **Contractor's Notification and Acknowledgement**

F065 **Asbestos - Visual Re-inspection summary sheet**

F118 **Asbestos Incident (Fibre Release) flow chart – Shown in Appendix A**

GF011 **Asbestos Investigation Guidance Note**

F117 Post Asbestos Incident Checklist

1.3.1 All the above forms can be found for Internal King's staff at https://internal.kcl.ac.uk/about/ps/safety/fire-building/asbestos

1.3.2 Estates & Facilities Directorate Procedures, Estates & Facilities "Procedure for Asbestos Management" can be located here EF-ASU-02-PR04.

1.3.3 Recent update of PR04 has extracted the following documents:

PR68 Asbestos Register Guide and PR69 Asbestos Reinspection

1.4 Definitions

1.4.1 In this document, the following definitions apply:

- "**King's**", or "**the university**" means King's College, London.
- "**Contractor**" means anyone the university employs to do work of any kind who is not an employee and may in the course of his or her business carry out or manage construction work.
- "**CAR**" means Control of Asbestos Regulations 2012
- "**AMP**" means the Asbestos Management Plan
- "**ACMs**" means Asbestos Containing Materials
- "**EAR**" means the Electronic Asbestos Register
- "**LARC**" means Licensed Asbestos Removal Contractor
- "**HSE**" means the Health and Safety Executive
- "**EA**" means the Environment Agency
- "**Project**" includes all preparation, design, planning, construction work and clearance of the site for occupation or use at the end of the construction phase and handover.
- "**Chrysotile**" is White Asbestos
- "**Crocidolite**" is Blue Asbestos
- "**Amosite**" is Brown Asbestos
- "**Dutyholder**" means:

  a) every person who has, by virtue of a contract or tenancy, an obligation of any extent in relation to the maintenance or repair of non-domestic premises or any means of access thereto or egress therefrom; or

  b) in relation to any part of non-domestic premises where there is no such contract or tenancy, every person who has, to any extent, control of that part of those non-domestic premises or any means of access thereto or egress therefrom,

c) and where there is more than one such dutyholder, the relative contribution to be made by each such person in complying with the requirements of this regulation will be determined by the nature and extent of the maintenance and repair obligation owed by that person." **CAR 2012 Regulation 4**

- "**ACOP**" means Approved Code of Practice. An ACOP issued by the Health and Safety Executive gives guidance on how to comply with the regulations to which it applies. Following an ACOP is not mandatory, but in a court of law, failure to adopt the advice in an ACOP will be regarded as having failed to comply with the law.
- "**CDM**" or "**CDM 2015**" means the Construction (Design & Management) Regulations 2015
- "**Construction Work**" any works as defined in Appendix D.
- "**Client**" means anyone who accepts the services of another, in the context of this document the Client will be the university and those employees that represent the client's interests will be the "Client Representative"
- "**Designer**" means any person, including the client or contractor, who in the course of the works prepares or modifies a design or arranges for or instructs anyone under his control to do so.
- "**Project Manager**" means any person undertaking project works on behalf of the university; this includes Senior Project Managers, Directors of Real Estate Development, Consultant Project Managers and Campus Project Managers.
- "**Contractor**" means anyone the university employs to do work of any kind who is not an employee and may in the course of their business carry out work for the university or a university employee (e.g. consultants, maintenance, construction work, cleaning, security etc).
- "**ISO 17025**" means BS EN ISO/IEC 17025:2005
- "**ISO 17020**" means BS EN ISO/IEC 17020:2012

2.0 APPOINTMENTS, ROLES AND RESPONSIBILITIES

2.1.1 Tasks relating to asbestos management may be delegated but the accountability may not.

2.1.2 As per section 2.4, the day to day administration of the Asbestos Management Programme is undertaken by the Estates & Facilities Safety & Compliance Team and their key contact information are as follows: The Team email address for all asbestos related enquires is: asbestosmanagement@kcl.ac.uk

2.1.3 Key contacts are detailed in : Estates & Facilities "Procedure for Asbestos Management" EF-ASU-02-PR04.

2.2 Duty Holders

College Council:

- The university commitment to promoting a healthy and safe working environment.
- Approval of the AMP

Principal & President:

- Ensure university wide compliance with and implementation of the AMP

Director of Estates and Facilities:

- Acts on behalf of the Principal in respect of this AMP
- Ensures compliance with and implementation of the AMP.

2.3 Responsible Person (Asbestos)

2.3.1 The **Director of Estates & Facilities** has the responsibility for ensuring that the arrangements for asbestos management within the fabric of the estates are satisfactory and shall, along with the **College Council** and **Principal & President** ensure that adequate resources are made available to allow the implementation of this document:

- Acts on behalf of the Principal in respect of this AMP
- Develop the asbestos register to maintain accurate information and risk assessments on asbestos materials contained within King's buildings
- Develop appropriate systems for asbestos management and monitor their implementation
- Implement arrangements for training and communicating relevant information on asbestos and these management arrangements to relevant staff, contractors and others as appropriate.
- Ensure that robust asbestos management reporting structures are established and reviewed regularly to monitor their effectiveness.

2.4 Estates & Facilities Safety & Compliance Team

Head of Technical Compliance

2.4.1 The **Head of Technical Compliance** has overall responsibility for strategic asbestos management including procedures and practices. Ensuring development and implementation of the AMP, which includes:-

- Assisting the Responsible Person (Asbestos) in respect of their duties under the AMP and has day-to-day management of the Technical Compliance Team.
- Commissioning and implementing the AMP.
- Ensuring the provision of awareness and/or procedural training courses for all university staff (including agency and contract staff under direct control) whose job requires them to manage and/or work near known or suspect ACMs
- Commission an annual review of the AMP to review all management processes and their effectiveness.

Senior Technical Compliance (Asbestos) and Technical Compliance Manager

- The day-to-day administration and maintenance of the Asbestos Management programme
- Maintenance of the Asbestos Register and all other relevant information pertaining to the control and management of asbestos.
- Conduct and/or otherwise allocate to the approved consultant or other competent persons, the task of providing detailed technical specifications and management services (including the provision of site inspection and air monitoring services) for scheduled or emergency abatement works.
- Provide a platform to obtain training so that university staff whose work could foreseeably disturb the fabric of any building (including agency and contract staff under direct control) or whose job requires them to work near known or suspect ACMs
- Commission or otherwise complete a detailed and comprehensive asbestos register for all buildings suspected of containing ACMs. Include within this scope any future acquisitions.
- Commission or otherwise complete a regular review and evaluation of all ACMs periodically based upon risk as circumstances and assessments warrant.
- Carry out an annual review of the AMP to review critically all management processes and their effectiveness as well as the overall progress made against the implementation action plan.
- Monitor and make adjustments to the labelling that identifies the presence of all known or suspect ACMs within university property as required.
- Ensure the timely updating and maintenance of the Asbestos Register and all other relevant information pertaining to the control and management of asbestos.

- Co-ordinate the response to any report of suspect asbestos-containing building materials, asbestos debris, damage or disturbance. This will include evaluation of circumstances under which it has been encountered and initiating the necessary sampling, clean-up, removal or repair as appropriate liaising with the Head of Technical Compliance.
- Carry out Asbestos Register reviews (F062) and Advise managers or project managers on the retrieval and evaluation of EAR information connected to any maintenance, renovation, or construction activities that they are planning to undertake.
- Monitor asbestos work instructions/method statements to ensure the individual manager or project manager in charge of the work has followed the AMP and allow for update of the EAR.
- Ensure a copy of all site inspection reports and corresponding air monitoring data is made available to whosoever wishes to inspect such reports.

Technical Compliance Officer

- Assists the Head of Technical Compliance, Senior Technical Compliance Manager (Asbestos) and Technical Compliance Manager. Undertakes re-inspections of identified and presumed ACMs at regular periodic intervals as planned according to risk.

2.5 Estates & Facilities

All Managers and Directors

- Ensuring day-to-day compliance with this management plan, asbestos register and any associated procedures.
- Ensuring that any works that may disturb or damage ACMs are avoided.
- Ensuring staff within their area of control are conversant with asbestos management procedures specific to their work area and have undertaken appropriate asbestos awareness training where required.
- Reporting any accidents/incidents involving suspect asbestos containing material, non-conformances associated with this plan and the register via the university's accident reporting system and to the Estates & Facilities Technical Compliance Team. For example, any material suspected to contain asbestos where the material has been damaged or disturbed or where staff/contractors are likely to undertake work that may affect such materials.
- Liaise and seek advice from the Safety & Compliance Team in any proposed changes to the workplace and any intrusive works to ensure continued compliance with this management plan and any associated procedures.
- Ensuring that, on works (including projects) under their or their staff control and prior to commencement of works, all known asbestos risks are identified from the asbestos register

and where applicable refurbishment/demolition surveys have been undertaken and that this information is made available to the whole team (e.g. project or maintenance).

- Ensure that any survey information or information pertaining to asbestos remediation works are provided to the Safety & Compliance Team in accordance with this management plan. This applies to all applicable project and maintenance/reactive works.
- To ensure staff asbestos awareness training is kept up to date for those who need it.

2.5.1 With regard to management of contractors under their control, ensure:

- competence of all contractors has been evaluated prior to award of contract in line with the requirements of this asbestos management plan.
- evidence of asbestos awareness training for all staff employed on the contract, and persons under their control, within the last year and maintenance of this annual training (e.g. by means of refresher training in accordance with Regulation 10 CAR 2012) throughout the duration of the contract has been provided.
- that contractors undergo Estates & Facilities contractor induction.
- that contractors are familiar and shall comply with all requirements set forth by the university as they pertain to work undertaken by the contract.
- that contractors conduct their work in accordance with such requirements and in compliance with all regulations and guidelines pertaining to asbestos including the King's College London Asbestos Management Plan.

All Staff

- Ensuring day-to-day compliance with this management plan, asbestos register and any associated procedures.
- Check or are in receipt of information from the asbestos register for the location of applicable work in properties constructed before the year 2000 and before any works commences.
- Ensuring that any works that may disturb or damage ACMs are avoided.
- Reporting any accidents/incidents involving suspect asbestos containing material, non-conformances associated with this plan and the register via the university's accident reporting system and to the Safety & Compliance Team. For example, any material suspected to contain asbestos where the material has been damaged or disturbed or where staff/contractors are likely to undertake work that may affect such materials.

2.6 IT - Information Technology

- Ensuring compliance with this management plan, asbestos register and any associated procedures.
- Ensuring that any works that may disturb or damage ACMs are avoided.

- Ensuring staff within their area of control are conversant with asbestos management procedures specific to their work area and have undertaken appropriate asbestos awareness training where required.
- Reporting any accidents/incidents involving suspect asbestos containing material, non-conformances associated with this plan and the register via the university's accident reporting system and to the Estates & Facilities Safety & Compliance Team. For example, any material suspected to contain asbestos where the material has been damaged or disturbed or where staff/contractors are likely to undertake work that may affect such materials.
- Liaise and seek advice from the Estates & Facilities Safety & Compliance Team in any proposed changes to the workplace that may involve intrusive works or access to ceiling voids or risers to ensure continued compliance with this management plan and any associated procedures.
- Ensuring that, on works under their or their staff control and prior to commencement of works, all known asbestos risks are identified from the asbestos register. Where refurbishment/demolition surveys have been undertaken, this information is made available to their whole team (including any contractors) and is included in their risk assessments and method statements for the works.
- Ensure that any survey information or information pertaining to asbestos remediation works are provided to the Estates & Facilities Safety & Compliance Team in accordance with this management plan. This applies to all applicable works.

2.6.1 With regard to management of contractors under their control, ensure:

- Competence of all contractors have been evaluated prior to award of contract in line with the requirements of this asbestos management plan.
- Evidence of asbestos awareness training for all staff employed on the contract, and persons under their control, within the last year and maintenance of this annual training (e.g. by means of refresher training in accordance with Regulation 10, CAR 2012) throughout the duration of the contract has been provided.
- That contractors undergo Estates & Facilities contractor induction.

2.7 Other Staff and Students

- All building alterations, refurbishment or minor works (e.g. installation of shelving, picture hanging etc.) must be organised and co-ordinated by Estates & Facilities to ensure that any activity that may disturb or damage asbestos containing materials is avoided. Under no circumstances should unauthorised staff or students undertake this type of work.
- Reporting any accidents/incidents via the university's accident reporting system, to their line manager and Estates & Facilities service desk and or Operations Team. For example, any suspect material where the material appears to have been damaged or disturbed or the poor practices of contractors or the university's directly employed labour.

2.8 Contractors, Consultants & Service Providers

- Submitting completed notification and acknowledgement forms F003 and F064 in relation to rules and regulations for contractors and asbestos presence on the university's estate.
- Providing evidence of asbestos awareness training
- Complying with the university's asbestos management plan and any associated procedures.
- Undertaking Estates and Facilities contractor induction
- Providing risk assessments and method statements that includes asbestos register or survey information provided by their university contact.

2.9 Asbestos Consultants and Licensed Asbestos Removal Contractors

Consultants

2.9.1 As and when required:

- Providing a management consultancy service in the areas of asbestos management and abatement
- Undertaking surveys and sampling, where requested, in accordance with current legislation
- Reviewing and commenting on projects where asbestos works may be necessary including the provision of information for any building projects and on contractor's method statements
- Supervision of asbestos removal works including, but not restricted to, attending pre-start, progress and completion meetings
- Reporting to the Technical Compliance Team any defects or non-compliances relating to the Asbestos Removal Contractor's performance, including suitability of work areas, adherence to method statement and compliance with university policy.
- Checking areas on completion of works to ensure that the LARC has completed his scope of works and all affected areas have been left in a satisfactory condition.
- Issuing completion reports, including all clearance documentation to include a minimum of analysis confirmation or applicable survey reference, technical specification or scope of works, method statement, clearance certification and consignment notes.
- Updating and issuing asbestos surveys, including update of plans where applicable, following the removal or reduction of risk of asbestos containing materials.
- Providing training programmes for university staff.
- Bringing to the attention of The Team and/or the H&SS any concerns regarding the management of ACMs on university premises.

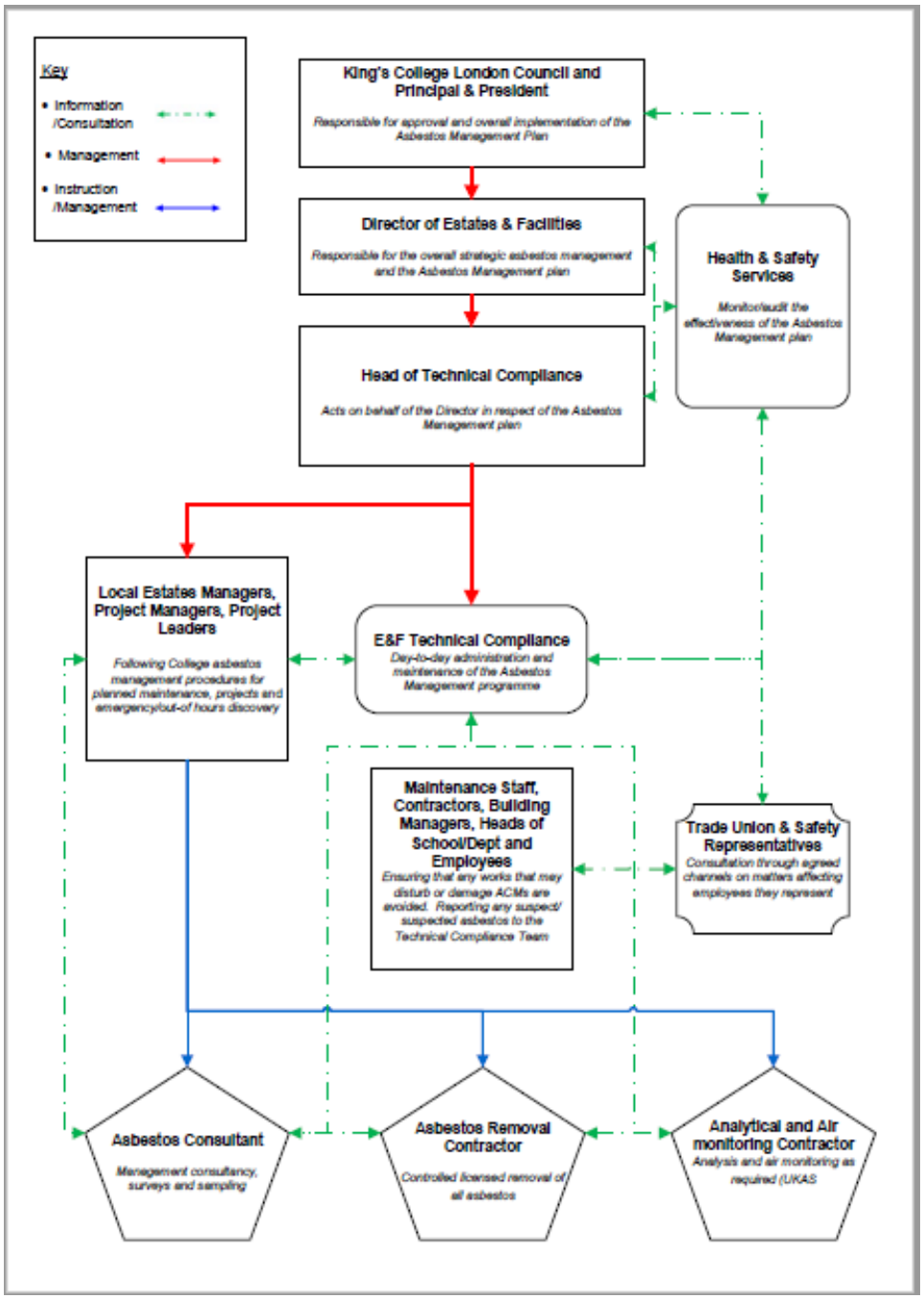
Licensed Asbestos Removal Contractor (LARC)

- Complying with current legislation and ACOPs and guidance
- Removal and/or encapsulation of ACMs in a safe and controlled manner without increasing risk of exposure to asbestos fibre to staff, students and visitors etc.
- Attend site, as directed by the Asbestos Consultant, or other competent persons, for the making safe of any uncontrolled disturbances of ACMs
- Assisting to the Asbestos Consultant or other competent persons, in the undertaking of refurbishment/demolition asbestos surveys as necessary.

2.10 Health & Safety Services

- Liaise with university Dutyholders above as necessary
- Review (and revise as necessary) the asbestos management plan at regular intervals with the E&F Technical Compliance Team
- Monitor/audit the effectiveness of the AMP

2.11 Organisational Chart



Estates & Facilities

2.11.1 Competence is defined as a combination of skills, qualifications, knowledge, training and experience sufficient to allow a person to be capable of performing their role effectively. Any one of these alone is unlikely to be sufficient to identify a person as competent. The Competency matrix has been developed as per Appendix F and is designed to assist with the identification of the health and safety training needs analysis for those on or near asbestos-containing materials or

may have occasion to respond to instances of damaged asbestos (including accident/incident investigation).

Others

2.11.2 The competency requirements required for non-Estates and Facilities staff must be determined using the same Competency Matrix (Appendix F) in conjunction with the individual's role requirements. For example, an IT project manager would require training commensurate with the requirements of Campus Operations – Project Manager.

2.12 Non-LARC Contractors

2.12.1 For all contractors working on site as per Regulation 10 of CAR 2012, asbestos awareness training should be given to employees whose work could foreseeably disturb the fabric of a building and expose them to asbestos or who supervise or influence the work.

2.12.2 It is the contractor's employer who has responsibility to ensure attendance at asbestos awareness training within the last year and that they will maintain this annual training (e.g. by means of refresher training in accordance with Regulation 10 CAR 2012) throughout the duration of working on the contract.

2.12.3 All contractors working at King's are required to complete and return the 'Contractors Notification and Acknowledgement Form – F064' before being permitted to work within King's owned or occupied properties.

2.12.4 This form acts as a notification to all contractors that asbestos is present in King's properties and sets out the requirements to follow King's processes and procedures as well as an acknowledgement that staff attending sites will be in receipt of annual asbestos awareness training. Records of the completion and return of these forms is maintained on the permit to work system.

2.12.5 Any deviation from this must be agreed with the Estates & Facilities Technical Compliance Team prior to work on site. (e.g. removal of intact electrical distribution boards containing ACMs).

2.13 Asbestos Consultants and Licensed Asbestos Removal Contractors

Consultants

2.13.1 Before an asbestos consultant is appointed, they must first be able to demonstrate their compliance with the following requirements:

2.13.2 A company accredited by UKAS or equivalent to the standard of ISO 17020.

2.13.3 Any testing laboratory sampling for asbestos fibres in air (including 4-stage clearance) and analysing asbestos in bulk materials must be accredited to ISO 17025.

2.13.4 A company must have the appropriate training, knowledge and experience commensurate to the tasks being undertaken. The organisation or individual surveyor must have satisfactory knowledge and experience of the type of building that is subject to survey.

2.13.5 Analytical laboratories must hold Category 1 laboratory status in the Regular Inter-laboratory Counting Exchanges (RICE) scheme and have a satisfactory performance in the Asbestos in Materials Scheme (AIMS) scheme.

2.13.6 The firm must carry and/or be able to provide Professional Indemnity Insurance endorsed specifically to provide coverage in respect of any claim arising from the exposure, clean-up, removal, containment, testing or monitoring of asbestos. The said policy must provide coverage in an amount not less than five (5) million pounds (£5,000,000) per occurrence and must be issued on an occurrence-based form. Additionally, public, product and public liability insurance of not less than five (5) million pounds (£5,000,000) and employer liability insurance of not less than five (5) million pounds (£5,000,000).

2.13.7 **Note** - ISO 9001 registration of an organisation gives assurance of quality systems that are managed effectively, although this requirement can also be demonstrated to have been met by ISO 17020 and ISO 17025.

Licensed Asbestos Removal Contractor (LARC)

2.13.8 To ensure the highest standard of care is maintained at all times, only those LARCs with established reputations for quality workmanship in the field of asbestos control and remediation shall be considered for work at any university owned or occupied premises.

2.13.9 Before an LARC may be considered for work at any university owned or occupied premises, the LARC must first be able to demonstrate his compliance with the following requirements:

- Hold a current licence under the CAR 2012 and granted by the Health and Safety Executive suitable for the works to be undertaken and for which a licence is required.
- Both the organisation as well as its supervisory staff must have a minimum of three (3) years prior experience in the field of asbestos control and remediation.

- All supervisory staff must hold a recognised certificate proving attendance at an asbestos removal training course (2-day minimum duration) and have performed supervisory functions on at least five (5) other asbestos abatement projects of similar size and complexity.
- The firm must carry and/or be able to provide Professional Indemnity Insurance endorsed specifically to provide coverage in respect of any claim arising from the exposure, clean-up, removal, containment, testing or monitoring of asbestos. The said policy must provide coverage in an amount not less than one (1) million pounds (£1,000,000) per occurrence and must be issued on an occurrence-based form. Additionally, public, product and pollution liability insurance of not less than five (5) million pounds (£5,000,000) and employer liability insurance of not less than ten (10) million pounds (£10,000,000).
- It must be licensed to transport asbestos waste and/or demonstrate that sufficient arrangements have been secured with a licensed waste haulier to ensure proper handling and final disposal of all waste at a licensed landfill site.
- Provide proof that all employees have had instruction on the hazards of asbestos exposure, the use of respirators and training on all other aspects of asbestos controls and procedures and additionally, proof of fit testing applicable to the types of respirators used in compliance with Regulation 10 of CAR.
- Provide proof that all employees are enrolled in a medical surveillance programme.

3.0 TRAINING

3.1.1 General training for university employees is detailed in:

- SPR-035 - Safety Information, Instruction, Training and Supervision in King's College London https://internal.kcl.ac.uk/about/ps/safety/sm/procedures/spr035.pdf

3.1.2 Accident investigations should only be carried out by competent persons with the correct level of technical knowledge. To this end, university requires such staff to meet the following criteria:

- Attended the Health & Safety Services (H&SS) accident reporting and investigation training module.
- Evidence of equivalent training

3.2 Asbestos Training

3.2.1 Appropriate training must be provided for those involved with the operations of the Asbestos Management Plan and those whose normal duties may bring them into contact with ACMs. In addition, so far as is reasonably practicable, security contractors, cleaners and portering staff may also be invited to complete an e-learning awareness module. The e-learning module is also available to any member of King's staff who wishes to know more about the management of Asbestos at King's.

3.2.2 Training should include but is not limited to:

- Understanding the contents and location of the asbestos register
- Understanding of the use of asbestos in buildings
- How to avoid exposure
- Risks posed to staff and contractors by exposure to asbestos
- What to do if you find asbestos
- How to ensure that work is not undertaken on any material without knowing if it contains asbestos
- The procedures to follow before any work is commenced where ACM's could be disturbed, including the permit to work system

3.2.3 The Directorate operates a Training Matrix which is managed by line managers. The matrix identifies all employees and identifies which level of training they require, and asbestos awareness training requirements are further detailed in the Asbestos Management Plan. This is then monitored/reviewed on an annual basis to ensure that any changes in an individual's role profile which may necessitate the need for further training are identified, recorded on the matrix and implemented as is required.

3.2.4 For directly employed labour whose normal duties may bring them into contact with ACMs face to face asbestos awareness training is arranged for all new starters and every 3 years. On intervening

years, the asbestos e-learning module must be completed and passed by all employees who have been identified as requiring asbestos awareness training.

3.2.5 Asbestos awareness training packages have been developed with the university's asbestos consultant to be bespoke to King's arrangements and procedures for general employees as well as managers and project managers.

3.2.6 Each intended user of the Asbestos Register must receive a training session/induction in the use and navigation of the Asbestos Register before they are permitted to use the Register for the purpose of completing activities or issuing permits. There is regular liaison between the Computer Aided Facilities & Data Analyst Manager and the Technical Compliance Team with regards to new Planon users to ensure that new users who require this training session are identified.

3.2.7 All asbestos training for King's directly employed labour will be recorded via the use of the F063 Employee Training and Acknowledgement Form

Asbestos Awareness

3.2.8 Formal classroom Asbestos Awareness Training or Online Training/E Learning if applicable, will be in accordance with Regulation 10 CAR 2012 and this can be undertaken by our Term Asbestos Consultant.

3.2.9 Briefly the following will be covered: the background to what asbestos is, what ill effects can result from airborne exposure, what it has been used for and where it is likely to be found in the premises and management and control standards and procedures.

Asbestos Awareness for Managers

3.2.10 Will cover the duty to manage asbestos within premises under Regulation 4 and assessments for the presence of asbestos ahead of works under Regulation 5 of the Control of Asbestos Regulations 2012. Arrangements and systems in place within the university to manage asbestos in its premises – including details of the management plan; methodology to be used in carrying out assessments of exposure to airborne asbestos fibre. The role of the university in the exchange of information with Estates Managers, residence managers and contractors prior to planned works on the premises, which may involve disturbance of suspected ACMs.

Asbestos Awareness for Project Managers

3.2.11 Will cover details of this management plan including methodology to be used in carrying out assessments of exposure to airborne asbestos fibres and compliance with the Control of Asbestos Regulations 2012 including, but not limited to:

- Regulation 5 - identification of the presence of asbestos ahead of works.
- Regulation 6 - assessment of work that exposes employees to asbestos.
- Regulation 7 – ensuring the Asbestos consultants and contractors prepare suitable written plans of works.

- Regulation 9 – notification of work with asbestos to the enforcing authorities.
- Ensuring understanding and interpretation of 4-stage clearances, related terminology, definitions, air monitoring results and survey reports/asbestos register.

3.2.12 The role of the university in the exchange of information with Estates Managers, residence managers and contractors prior to planned works on the premises, which may involve disturbance of suspected ACMs.

Asbestos Register Inductions

3.2.13 All staff members utilising or interrogating the asbestos register, currently held on Planon, shall attend a session in the use of the software.

Technical Compliance Team

3.2.14 Specialist training for Technical Compliance Team such as BOHS or equivalent modules.

3.2.15 Additionally, those involved with the inspection, review and update of the asbestos register are required to possess BOHS module P402 –"Building Surveys and bulk sampling for asbestos".

Refresher training

3.2.16 This will be undertaken, if review does not indicate otherwise, at the following intervals:

1. Asbestos awareness – annually

3.2.17 Year 1 and every Three years, or as legislation changes, will be face-to-face with a competent trainer. E-learning packages designed to complement and reinforce the face-to-face training sessions will be mandatory for year two and Three.

2. Asbestos awareness for managers and project managers – every 3 years.
3. Specialist training for the Technical Compliance Team – P402R (management building surveys) as required.

3.2.18 Courses (2) and (3) will be face-to-face/on line or via planned e-learning with a competent trainer either in-house bespoke or externally accredited and must fulfil all requirements of Regulation 10 CAR 2012.

4.0 SURVEYS, RISK ASSESSMENT AND REPORTS

4.1 Surveys

4.1.1 The University performed Type 2 surveys across its building portfolio in 2005-2006 in order to identify and clarify the condition of asbestos containing materials. New properties which have been acquired since this time were subject to a Type 2 or Management Survey upon acquisition. Since 2010 all acquisitions have had a management survey, conforming to HSG264, performed.

4.1.2 An asbestos survey has four main elements:

1. It must locate and record, as far as is reasonably practicable, the location, extent, asbestos and product type of any presumed or confirmed ACMs.
2. It must inspect and record information on the accessibility, condition and surface treatment of any presumed or confirmed ACMs.
3. It must determine and record the asbestos type, either by laboratory analysis following sampling or by making a presumption based on product type, appearance, location and a knowledge of the history of the usage of asbestos.
4. It must also indicate locations of materials that have been identified as not containing asbestos i.e. As a result of sampling and analysis.

4.1.3 The information must be held in a suitable form that is easily understood and readily accessible by all relevant personnel and can be updated as required.

4.1.4 There are three types of surveys for identification of Asbestos Containing Material (ACM) detailed within the HSE guidance HSG264, Asbestos-the Survey Guide for the surveying, sampling and assessment of asbestos containing materials. These are the Management survey, the Refurbishment survey and the Demolition survey.

Management Survey

4.1.5 This type of survey is for the purpose of managing asbestos-containing materials during the normal occupation, day to day maintenance and use of premises.

4.1.6 A Management Survey aims to ensure that:

- Nobody is harmed by the continuing presence of asbestos containing materials in the premises or equipment.
- That the asbestos containing materials remain in good condition; and
- That nobody disturbs it accidentally

4.1.7 It involves minor intrusion and minor asbestos disturbance to make a materials assessment which shows the ability of the ACM, if disturbed, to release fibres into the air.

4.1.8 The surveyor should be provided with the site layout, building plans, building specifications or architect's drawings, and any history of asbestos work; point out site hazards, including means of safe access to heights and provide keys, etc.

Refurbishment Survey

4.1.9 This type of survey is required where the premises, or part of it, need upgrading or, refurbishment (See CAR reg 5).

4.1.10 A refurbishment survey aims to ensure that:

- Nobody will be harmed by work on asbestos-containing materials in the premises or equipment.
- Where it is foreseeable that ACM is likely to be disturbed during the refurbishment or installation works, they can be safely removed from the work area as far as reasonably practicable prior to works. Such work will be done by the right contractor in the right way.
- The survey must locate and identify all ACM before any work begins at a stated location or on stated equipment at the premises. It often involves destructive inspection and asbestos disturbance.
- The dutyholder must provide the surveyor with the site layout, building plans, building specifications or architect's drawings, and any history of asbestos work; point out any site hazards, including means of safe access to heights and provide keys, etc.
- The survey must align to the scope of any planned works and must be revisited if the scope of work changes.

4.1.11 Whenever possible, an on-site pre-start meeting with the asbestos surveyor should be arranged to agree the exact scope of the refurbishment or installation works and therefore the exact scope of the survey that will be required.

4.1.12 The area surveyed must be vacated during the survey and be left 'fit for reoccupation' after the survey.

Demolition Survey

4.1.13 This type of survey is required where the premises, or part of it, are scheduled for demolition (see CAR reg. 5).

4.1.14 A demolition survey includes all the requirements of a refurbishment survey (as above). However, the survey is disruptive and fully intrusive to ensure that all ACMs are identified for safe removal from the building as far as reasonably practicable prior to demolition.

4.1.15 The surveyor should be provided with all known details of pre-existing structures or buildings previously demolished, underground ducts or shafts etc.

4.1.16 It is possible to combine elements of a demolition survey within a refurbishment survey report, dependant on the scope of the works.

4.1.17 The area surveyed must be vacated during the survey and be left 'fit for reoccupation' after the survey.

4.2 Risk Assessment

Material Assessment

4.2.1 The material assessment is an assessment of the condition of the ACM, or the presumed ACM and the likelihood of it releasing fibres. The material assessment looks at the type and condition of the ACM and the ease with which it will release fibres. However, there are other factors to take into account when prioritising action and these are considered in the priority assessment.

4.2.2 King's utilises the guidance given in HSG264 (Asbestos: The Survey Guide) with regards to carrying out the material assessment.

Priority Assessment

4.2.3 The material assessment (above) identifies the high-risk materials, i.e. those that will most readily release airborne fibres if disturbed. The priority assessment looks at the likelihood of someone disturbing the ACM. It does not automatically follow that those materials assigned the highest score in the material assessment will be materials that should be given priority for remedial action. Management priority must be determined by carrying out a risk assessment that will take into account factors such as:

- Maintenance activity.
- Occupant activity.
- Likelihood of disturbance.
- Human exposure potential.

4.2.4 King's utilises the guidance given in HSG227 (A Comprehensive Guide to Managing Asbestos in Premises) for completing the priority assessments for all ACMs and presumed ACMs.

Combined Risk Assessment

4.2.5 The risk assessment for an ACM is the total of the two figures determined by the material assessment and the priority assessment. The algorithm score leading to a possible maximum score of 24. This risk assessment can only be completed by persons with sufficient information, training and experience and may require the input from several stakeholders to ensure that the most up to date information is utilised, for example, the occupant activity. The risk assessment will form the basis of the management plan for ongoing compliance.

4.2.6 Asbestos may be present as a low risk but located in an area where works are planned so decisions on removal may not use this assessment as asbestos is required to be removed prior to works likely to disturb.

4.2.7 Decisions on the actions deemed necessary will be assisted by the results from the risk assessment that is the combination of the material assessment and the priority assessment as outlined above. These scores can be broken down into categories with actions appropriate to each category detailed.

4.2.8 The asbestos consultant carries out the Priority Assessment and this is checked and completed by King's College London.

4.2.9 The scoring is as follows:

HIGH RISK MATERIAL REQUIRING URGENT ATTENTION = Score 18 or more

4.2.10 The potential hazard arising from this category warrants urgent attention. Area must be made safe as soon as possible after identification and access to areas restricted and managed. Immediate plans for consultation with the Asbestos Consultant/LARC and the Estates & Facilities Technical Compliance Team should be made for the remediation of the asbestos containing materials.

4.2.11 Details to be collated for any subsequent investigation.

MEDIUM RISK MATERIAL REQUIRING PROGRAMMED REMOVAL WITHIN A SPECIFIED TIMESCALE/INSPECTION = Score 13 to 17

4.2.12 This category indicates that deterioration in any of the contributory factors may result in asbestos fibre release. Therefore, all asbestos within this category, would typically warrant remediation on a programmed basis usually within a specified time scale, appropriate action to be agreed with the Estates & Facilities Technical Compliance Team according to location and condition. The option chosen for remediation will follow the hierarchy of control. Until such a time as asbestos removal or remediation works are completed the asbestos item will require re-inspection at an increased frequency and approved warning labels ('A' Labels) should be positioned to help to prevent accidental damage to the material.

4.2.13 Considerations to be had on restricting access to the area in question.

MODERATE/LOW RISK MATERIAL REQUIRING REGULAR INSPECTION/ REMOVAL AS PART OF REFURBISHMENT AND DEMOLITION PROJECTS = Score 12 or less

4.2.14 This category indicates the need for regular monitoring as situations within this category do not pose an imminent risk to health and likelihood of fibre release is low under existing conditions but this risk may rapidly alter should any number of factors contribute to the materials deterioration. It is recommended that ACMs falling into this category is visually inspected periodically based upon risk to ascertain any change in condition and if any does, it can be promptly subject to control actions to prevent and increase in exposure and uncontrolled fibre release and a reclassification to the above category. Approved warning labels (A Labels) should be positioned to help to prevent accidental damage to the material. Any remedial action identified through reclassification to a higher category is to be agreed with the Estates & Facilities Technical Compliance Team according to location and condition. The option chosen for remediation will follow the hierarchy of control.

SAMPLE TAKEN AND CONFIRMED AS NON-ASBESTOS BY UKAS ACCREDITED LABORATORY = 0 points

4.2.15 No asbestos action necessary

4.3 Reports

4.3.1 Asbestos information held by the university is compiled into an Asbestos Register on Planon (please see Asbestos Register Reports and Asbestos Register for more information). This is the principal tool used for storage of asbestos information and compilation of asbestos reports. The Asbestos Register is a live tool and is updated as soon as possible after asbestos is identified, managed and removed.

Asbestos Documentation Store

4.3.2 All asbestos documentation, including survey reports, completion packs for asbestos remediation, incident investigation reports are uploaded to the Asbestos Documentation Store on Planon and held against each applicable building/campus therefore acting as a repository for documentation

4.3.3 Standard naming conventions are used to ensured consistency and ease of navigation:

- Management Survey
- Refurbishment Survey
- Demolition Survey
- Type 2 Survey
- Asbestos Bulk Analysis Certification
- F061 (for asbestos incident investigations)
- Asbestos Removal Documentation
- Asbestos Remediation Documentation
- Asbestos Occupational Risk Assessment
- Asbestos Free Statement
- Asbestos Register Report
- Asbestos Reinspection Report

4.3.4 Waste consignment notes are held with the asbestos removal/remediation documentation files on a project basis. Additionally, the Estates & Facilities Technical Compliance Team maintains a central register.

Asbestos Register Reports

4.3.5 Any planned work or which could disturb the fabric of a building will not start without the register and any available records being checked. Any requests to obtain information should allow appropriate time to obtain and reply as per below timescales before work starts.

4.3.6 **King's Staff -** For planned major maintenance, intrusive works or Capital Projects, The Technical Compliance Team can produce detailed asbestos register reports and action plans from Planon when a F062 Request is submitted via asbestosmanagement@kcl.ac.uk

4.3.7 Extract from F062 showing aimed turnaround of ACM requests based upon number of locations:

Purpose of this form:
Complete all blank fields to request up to date asbestos information. This should be actioned prior to any on-site works to allow sufficient time to review, carry out additional surveys, if required, or carry out asbestos removals, where required.
Submit a copy to Asbestos Assurance Team at asbestosmanagement@kcl.ac.uk who will return the asbestos information within the following timelines:

< 10 locations	5 working days
>10 <20 locations	10 working days
>20 <50 rooms	15 working days
50+	case by case basis
GSTT/KCH requests	case by case basis

4.3.8 The full procedure is detailed in Gateway 1 of Appendix B following on to all steps of the project lifecycle including checks being made on the correct controls being used by competent asbestos trained contractors who will carry out the works. Note all asbestos remediation works at King's are carried out by Licensed Asbestos Removal Contractors.

4.3.9 As per the section on Asbestos Training, trained Directly Employed King's Staff undertaking reactive or planned minor non-intrusive maintenance can download asbestos Register Summary reports from the Asbestos Register to assist in compiling suitable and sufficient risk assessments for minor non-intrusive maintenance tasks.

4.3.10 The procedure and detailed steps are included in Appendix C.

4.3.11 For all King's staff all forms are located here: https://internal.kcl.ac.uk/about/ps/safety/fire-building/asbestos

4.3.12 **Non-King's Staff** - All asbestos enquires from Non-King's staff should be emailed to asbestosmanagement@kcl.ac.uk in the first instance again allowing appropriate time for a response.

5.0 MANAGEMENT, REGISTER, CONTROLS AND ACTIONS

5.1 General Principles

5.1.1 This Asbestos Management Plan for ACMs within the University Estate will identify steps needed to be taken to ensure the continued safe occupation and operation of premises.

5.1.2 For all ACMs identified, there will need to be a series of Management Actions to be undertaken, it may also be necessary to subject some of the ACMs to Control Actions to restrict the spread of and exposure to asbestos fibres. The general principles of the asbestos management strategy are detailed in HSG 227 as a 7-step plan. At King's College London we are currently at Steps 6/7 where we are developing a long-term plan and monitoring and reviewing this plan.

5.2 Management Actions

The management of existing asbestos

5.2.1 It is important to ensure asbestos materials are not damaged or deteriorated to such an extent that university staff and students, external contractors or visitors are unnecessarily exposed to airborne asbestos fibres. The requirements of the contractor site induction and permit to work system will aid in the management of existing asbestos materials. It is also the policy of the King's College London to incorporate asbestos issues into building works contracts, designed to ensure any asbestos on, or in premises are dealt with in the appropriate manner. Asbestos removal may not be immediately necessary or possible but must be completed before a structure or part of a structure is demolished.

Monitor the condition of ACMs (Reinspection)

5.2.2 ACMs that are in good condition, sealed and/or repaired and are likely to be undisturbed will be left in place until its long-term future is decided.

5.2.3 The condition of these ACMs will be monitored periodically based upon risk and the results recorded. When the condition of the ACM starts to deteriorate, remedial action will be planned.

5.2.4 The time period between monitoring will vary depending on the type of ACM and the risk assessment, its location and the activities in the area concerned.

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

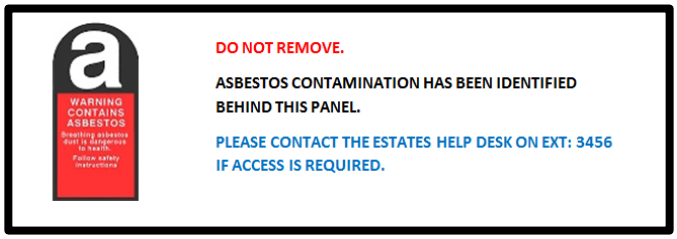
Labelling of ACMs

5.2.6 The university has implemented a system of labelling throughout their premises, to clearly identify and provide warning of the presence of asbestos containing materials.

5.2.7 Labels are not to be relied on solely for asbestos identification and management. They are an addition to a sound robust asbestos management system and are considered a last line of defence to help identify known asbestos.

- Labels must comply with CAR 2012 (note particular reference to Schedule 2) and/or BS5378 and Health and Safety (Safety Signs and Signals) Regulations 1996.
- King's College London will install self-adhesive labels, or other clear signage, in prominent positions on, or near, applicable asbestos containing materials
- Labelling alone will not be relied on as control measures in themselves. They may become dirty, obscured or fall off and therefore will only be used as a back-up measure.
- Good lines of communication between managers of the asbestos management system, workers and contractors must be maintained so that they have good, accurate information about ACMs on the premises.
- Once labelling is undertaken the labels themselves will be managed, which will include re-inspection and re-labelling as necessary where labels are removed, obscured or painted over etc. This can be managed during monitoring or re-inspection of ACMs.
- Where ACMs are identified in ceiling voids, these will be highlighted by at least one warning label placed near the perimeter of the area adjacent to each entrance point/doorway. Labels will not be placed on individual tiles.
- Anyone who has to lift or remove a tile as part of their work must:
- Prior to commencing work assess the asbestos register or seek further information from their line manager.
- Lower risk materials such as floor files, bitumen adhesive or external materials will not be routinely labelled.

5.2.8 The following labels are in use across the university:



5.2.9 All staff, students and contractors and expected to familiarise themselves with the labels.

5.2.10 Note: Other asbestos related labels may be found at various locations. These indicate where material samples have been taken for analysis and do not immediately indicate the presence of

asbestos. If asbestos is identified, then one of the above labels should also be visible in addition to the sample label.

5.2.11 Signage may also be observed to entrance areas prohibiting access into an area. This is typically due to damage of ACMs in the area or the identification of higher risk asbestos, such as dust or debris, which could give rise to the possibility of uncontrolled exposure to asbestos fibres. Such areas will be fitted with a hasp and staple (where appropriate) or doors sealed/screwed shut to lock them off together with fixing one of the below signs. The type of signage depends on if the entrance is located within a public facing area:

5.3 Control Actions

5.3.1 Table 1 provides a summary of the relative advantages and disadvantages of each control method, as well as situations in which each may be considered appropriate.

5.3.2 Work with asbestos containing materials shall be carried out according to methods described in HSE task guidance sheets (e.g. Asbestos Essentials) or HSG247 Asbestos: The licensed contractors' guide.

5.3.3 Procedures in the event of exposure to unidentified or damaged asbestos to be adhered to in the event of any asbestos or suspected asbestos materials being disturbed are contained in section 6.2.

Leave in place (defer action)

5.3.4 The identification of asbestos in a building does not automatically necessitate its immediate removal. Asbestos in a stable condition and not prone to mechanical damage can generally remain in place.

5.3.5 Higher risk ACMs located within a void or redundant area may also be left in situ. In this situation, access to the room/area where the asbestos is located will be prohibited.

5.3.6 The asbestos or signage/access control fitted to the area will need to be inspected on a regular basis (depending on risk and in meeting the requirements of the ACOP). Appropriate warning

signs/labels will be posted and a licensed contractor in accordance with the Control of Asbestos Regulations 2012 must remove ACMs prior to demolition or refurbishment works that may disturb the asbestos or access into the area/space.

Encapsulation or Sealing:

5.3.7 Encapsulation refers to the coating of the outer surface of the asbestos material by the application of an appropriate sealant, for example Idenden ET150. Typical sealants are high-build elastomeric coatings and provide impact resistance as well as up to 20 years of life if undisturbed. Sealants are designed to reduce the risk of exposure by inhibiting the release of asbestos fibres into the airborne environment and increase the length of serviceability of the product.

5.3.8 The use of encapsulation or sealing may be of limited application. It is not considered to be an acceptable alternative to repairing or removing severely damaged asbestos materials.

Enclosure or segregation

5.3.9 This involves installing a barrier between the asbestos material and adjacent areas. This is effective in inhibiting further mechanical damage to the ACM.

- Pipe lagging or sprayed asbestos may be targeted for enclosure where removal is not an option.
- The type of barrier installed may include polythene (typically temporary), plywood or sheet metal products, constructed as an enclosure around the asbestos.
- If barriers are installed, they must be on a monitoring regime and categorised as either permanent or temporary.
- Temporary barriers must be inspected weekly by the site manager if the area is used frequently as included within a normal routine until works are completed.

Removal of asbestos

5.3.10 Removal of asbestos must be performed under suitably controlled conditions, depending on the type of asbestos product to be removed.

5.3.11 Removal is preferred to the other abatement options such as enclosure or encapsulation, as it eliminates the hazard from the workplace.

5.3.12 The removal process, however, does pose an increased risk to personnel engaged in the removal, and may result in increased airborne fibre levels in adjacent occupied areas if the removal program is not strictly controlled.

5.3.13 The removal of asbestos is appropriate when an asbestos product has deteriorated to an unserviceable condition, is at risk of being disturbed, or the other control options are not feasible.

5.3.14 All asbestos containing materials must be removed, where reasonably practicable to do so, prior to demolition or refurbishment works. A licensed asbestos removal contractor on King's' approved list must undertake all asbestos remediation including non-licensed activities unless agreed by Technical Compliance Team and subject to competency checks.

5.4 Implementation Timetable

5.4.1 Where materials are identified that require any of the above actions, these will be timetabled for action according to their risk assessment by the Technical Compliance Team. These actions will be subject to regular review.

5.4.2 High risk items will be immediately locked off where applicable and the register updated following the completion of the required remediation works.

5.5 Asbestos Register

5.5.1 The Asbestos Register for King's College London forms the basis of this Asbestos Management Plan and is used to determine the management and control actions required for each ACM. The Asbestos Register forms an up to date record of all ACMs within any given location or property within the university's Estate.

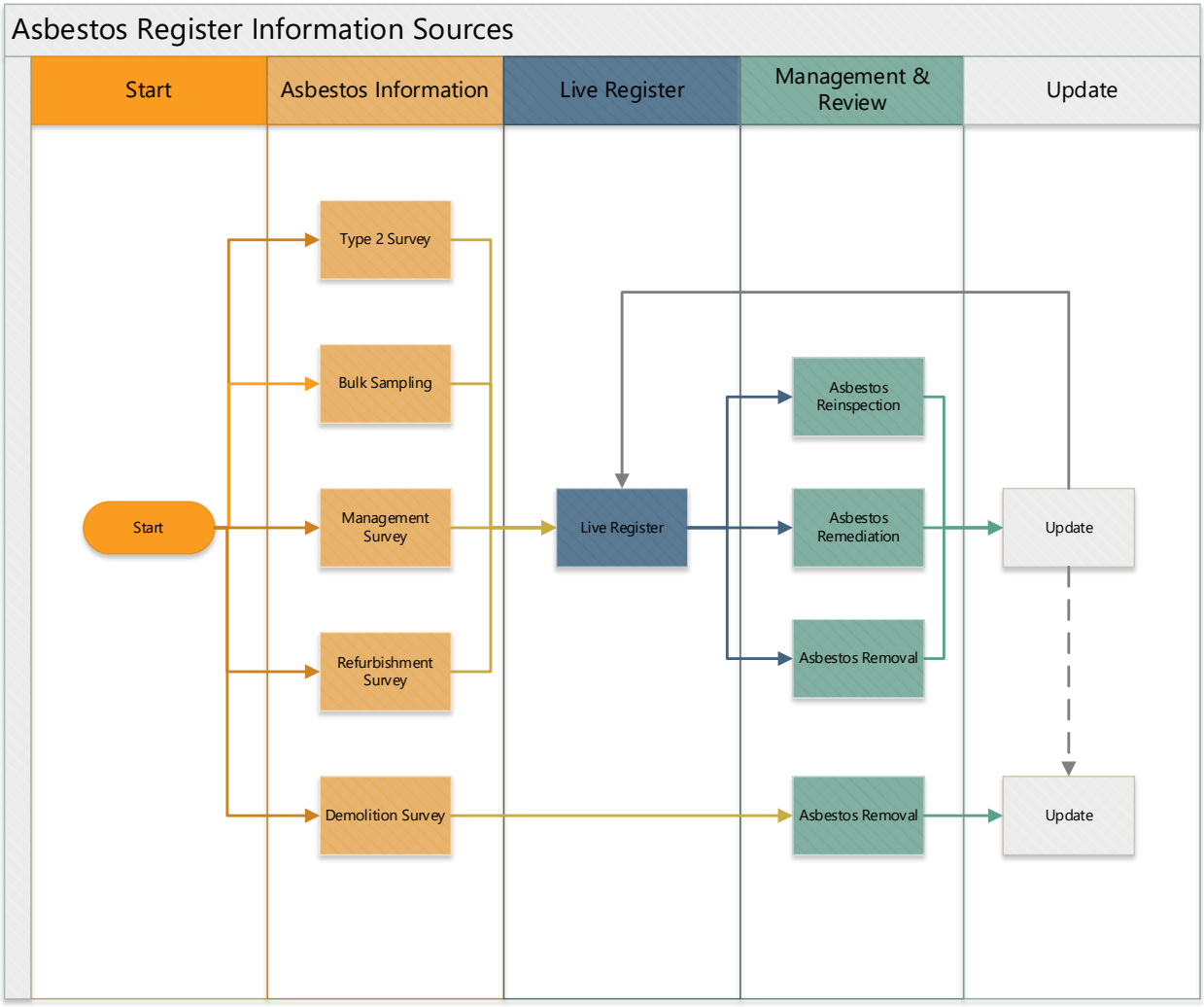
5.5.2 The Asbestos Register is maintained by the Technical Compliance Team and is available to those King's College London's staff who need access regularly after appropriate training. Information extracted from the Asbestos Register is therefore uncontrolled.

5.5.3 Technical Compliance Team are responsible for updating the Asbestos Register as required based on investigation and remedial works carried out and the production of the associated certificates to them.

5.5.4 The university will ensure that all current asbestos information available are added to the Asbestos Register. This includes:

- Asbestos Management Surveys
- Asbestos Refurbishment Surveys
- Further Investigations
- Bulk Sampling
- Remedial & Removal Works
- Re-inspections.

5.5.5 The below process chart shows how the following information sources are compiled into the Asbestos Register:



5.5.6 The register also contains information about materials that are suspected or presumed to contain asbestos but that have not been accessed or sampled for confirmatory analysis.

5.5.7 Any areas or items not accessed are also recorded and presumed to contain asbestos unless there is strong evidence to prove otherwise.

5.5.8 Unless otherwise stated, the asbestos register only contains those ACMs that are reasonably accessible and does not include ACMs that may be hidden within the fabric of the building or in inaccessible areas.

Reinspection of the Asbestos Register

5.5.9 All ACMs left in situ, whether encapsulated, enclosed or pending removal, must be re-inspected by competent persons periodically according to the risk presented with the timeframe varying depending on the type of ACM, the risk assessment, its location and the activities in the area concerned.

5.5.10 The reinspection is a walk-through visual re-inspection by suitably trained King's competent personnel or by the approved consultant. The F065 form is completed to confirm the activity and

saved within the Building File alongside the site notes. Although not a legal requirement, a minimum qualification of BOHS Proficiency Certificate P402 as well as the appropriate skill, knowledge and experience is the level to be authorised to undertake this activity.

5.5.11 The re-inspections are undertaken in order to ensure that the condition of the material remains unchanged and to ensure that the register is kept up to date. Information collated during these inspections will be used to update the Asbestos Register and appropriate actions taken regarding any recommendations made.

5.5.12 The audit frequency will be agreed between the Estates and Facilities Technical Compliance Team based on risk including comment from: University Safety Officers of Health and Safety Services where required.

Dissemination of Information

5.5.13 As detailed in Asbestos Register Reports, the Asbestos Register is accessible to relevant King's College London staff that manage work areas, undertake minor maintenance and installation works or any services within without disturbing the building fabric.

5.5.14 Contractors who work on the university site are required to follow the Estates & Facilities Rules and Regulations and applicable Contractor Induction document. This involves prior authorisation of risk assessment and confirmation of adequate asbestos training.

5.5.15 Information from the relevant section of the asbestos register must be imparted to contractor as part of pre-construction information and the planning process prior to any works starting on site to ensure that appropriate precautions are taken, and any asbestos risks are appropriately controlled. This dissemination of information is the responsibility of the person instructing and/or managing the works.

5.5.16 Any necessary assistance can be requested from the Technical Compliance Team.

5.5.17 All directly employed labour, including maintenance personnel who may be affected by the presence of ACMs (or may disturb asbestos) during their works are to be notified of its presence. It is the responsibility of the person completing the task to check the asbestos register before commencing works. If they do not have access, or are unable to do so, they must contact their line manager/supervisor.

Communication of this Plan

5.5.18 This Asbestos Management Plan will be available for all without access restriction on King's College London Website https://www.kcl.ac.uk/aboutkings/orgstructure/ps/safety/contrconsult

5.5.19 As mentioned in the Asbestos Training section, training will be undertaken to all staff who need it as part of their job role and this Asbestos Management Plan will be a tool to discuss what arrangements are communicated.

5.5.20 For Emergency Services – A roll out of high-level asbestos risk presented within each building has been undertaken with high level overview information stored in the Premises Information Box (PIB) for each building/site.

5.5.21 Employee representatives and trade union safety representatives will be supplied with a copy or link to this AMP as well as being part of discussions at any planned consultation.

5.5.22 Communication further to training will be undertaken by way of seminars, posters, newsletters, celebrating success and positive observations/actions being recorded as mentioned previous An Asbestos Risk Compliance Group is been organised from 2022 to further increase information exchanges.

5.6 Acquisition, Demolition and Disposal of Premises

Acquisition

5.6.1 When premises are surveyed with a view to the university acquiring them, the survey is to incorporate a statement regarding the availability of an up to date Asbestos Register and the extent, location and purpose of any ACMs in the premises.

5.6.2 Given the variation in the standards employed in the execution of asbestos survey reports and the compilation of asbestos registers the accuracy of these documents is not to be wholly relied upon.

5.6.3 If a register is not available, or the reliability of the register is in doubt, an asbestos survey must be commissioned.

5.6.4 The survey must be carried out by a competent person normally from King's College London approved asbestos consultant who are a UKAS Accredited Organisation.

Disposal

5.6.5 Where premises are being sold/transfer the Senior Estate Surveyor, in liaison with the Estates Campus Manager for the site and the Technical Compliance Team, must ensure that the person responsible for the disposal of the premises has been informed of the following:

- location and extent of any known ACMs on the premises
- the limitations of the surveys undertaken and the location of the current asbestos register.

Demolition

5.6.6 Where the premises are being demolished and managed by King's College London - the Project Manager in liaison with the Technical Compliance Team as detailed in 3.1 must arrange the appropriate Asbestos Demolition Survey and assess the risks of asbestos removal and potential concealed asbestos so far as reasonably practicable possible prior to demolition in accordance with CAR regulations and make suitable plans to prevent exposure to asbestos and control the risks.

5.6.7 Where demolition is being undertaken by a Principal Contractor, after known asbestos information is submitted within the Pre-Construction Information, the Principal Contractor would become the Duty Holder within the site boundaries and manage the asbestos removal and demolition as required and confirmed. In this case the Health and Safety File at the end of the work must be reviewed to check on residual asbestos risks for ongoing management requirements.

Asbestos in Soil

5.6.8 The Asbestos Approved Code of Practice (L143) was produced with the aim of managing asbestos risks in buildings and many parts of the document do not specifically address work on brownfield sites, asbestos in soils and construction and demolition materials. In order to assist interpret the regulations for soils, a joint industry working group (JIWG) under the authority of CL:AIRE has produced a document CAR SOIL that has been reviewed by the HSE and is accepted current industry guidance.

5.6.9 As stated in CAR SOIL:

'Generally-speaking, sampling and analysis of soils and/or C&D materials for asbestos should normally only be undertaken where, before any ground disturbance work, e.g. during the planned redevelopment of a site, there is a reasonable expectation that asbestos could be present and could present a risk to workers. If a site owner has information relating to the presence of asbestos on or under the land this should be passed on to contractors who may disturb it.'
'Consequently, a site investigation for asbestos is only usually required where there is a reasonable expectation that asbestos could be present from past industrial use (i.e. brownfield sites) or where there is specific evidence that demolition waste containing asbestos has been tipped or brought onto the site.'

It is also stated in HSG 248 V2 (2021) The Analysts Guide –that 'A survey to identify the presence of asbestos in soils and made ground is required only where there is a reasonable expectation that asbestos could be present and could present a risk to workers (i.e. only where there is existing knowledge to suggest that asbestos may be present in areas to be developed or redeveloped).'

5.6.10 Work with asbestos includes any work that is liable to disturb asbestos on or in the land or in construction and demolition materials, including the excavation, conveying, loading, processing etc. of soil and construction and demolition materials contaminated with asbestos fibres or ACMs, as well as any ancillary work and any supervision of such work.

5.6.11 In all circumstances where work of any nature is to be undertaken that will or may disturb the ground, there is a need to assess the potential for human health exposure risks from asbestos to occur to those who may be involved directly or indirectly with the works. This has the potential to generate airborne asbestos fibres and control measures will be required to mitigate associated risks to site workers, future site operators and external receptors.

5.6.12 Any ground disturbance to areas if identified or suspected to have asbestos contamination (either as bulk ACMs or loose free asbestos fibres in soils) must be assessed by either the Project Manager or Principal Contractor and managed appropriately using trained competent persons.

Waste Disposal

5.6.13 All waste that contains asbestos will be disposed of under the Hazardous Waste Regulations 2005 (as amended).

5.6.14 A licensed carrier will transfer asbestos waste to a licensed waste disposal site or holding facility.

5.6.15 Copies of the pre-notification and of the completed consignment note following disposal must be or requested from the contractor and kept on file.

6.0 EMERGENCY PROTOCOLS

6.1 General

6.1.1 The following procedure, summarised in the flow charts in appendix A, shall be adhered to in the event that any asbestos or suspect asbestos-containing materials are encountered, damaged or otherwise disturbed e.g. during routine maintenance, construction, etc. The level of response will depend upon a competent assessment to the level of release of asbestos fibres facilitated by the Estates and Facilities Technical Compliance Team.

6.2 Emergency Response Procedure in the Event of Exposure to Unidentified Suspect Material or Damaged Asbestos

6.2.1 Anyone suspecting that Asbestos containing Materials (ACM) have been disturbed must take the following action immediately:

1. STOP WORK
2. Evacuate all personnel from the immediate area to a suitable waiting area. (E.g. a suitable place to minimise/confine potential contamination, where communication by phone is possible. Avoid populated areas).
3. As you leave, close windows, doors etc. only if this is possible without causing further disturbance to the material or delaying evacuation.
4. Invoke a “stay put” protocol i.e. do not wander from the waiting area until help arrives and any decontamination process is actioned.
5. Immediately report to the manager of the works by phone.

6.2.2 The Manager of the works will contact the Campus Operations Manager (or equivalent), or their nominated deputy, who will:

- Contact the Estates and Facilities Technical Compliance Team who will ensure the university’s asbestos consultant is appointed to give advice on making the area safe and undertake a full assessment of the situation including air monitoring to assess the level of release of asbestos fibres and advise on emergency action plan.
- Identify and assemble an emergency response team and instruct them in the following tasks:
- Ensure the area has been made/safe locked off. E.g. door(s) closed, tape around the door(s). Only if this is possible without creating further disturbance or putting further personnel at risk.
- Prohibit access by barriers, signage as necessary to the area by unauthorized personnel
- Ensure, if areas are out of bounds or barriers in place to restrict access to the affected area that alternative fire exit routes are available and signed.

- Identify a competent "helper" who will convey the emergency pack to any potentially affected persons and assist in the initial decontamination process and transit to an identified decontamination area.
- Act as primary investigator or identify and appoint a primary investigator who will gather names of all persons potentially affected by the incident. This will require determining whether release of asbestos fibres has resulted in dust or debris on clothing.
- Contact Health & Safety Services (H&SS) and inform them of the incident and action taken.
- Work closely with the Technical Compliance and H&SS to arrange emergency response which will include any exposed persons being supplied with FFP3 masks and blue category 3, Type 5/6 hooded coveralls to enable transit from the waiting area to the identified decontamination area.

6.2.3 An emergency pack of FFP3 masks, blue category 3, Type 5/6 hooded coveralls, overshoes, gloves, towels, shower gel, clear heavy-duty polythene and contaminated waste bags etc. will be available at each campus in case of dust or debris on the clothing of persons involved.

6.2.4 Clothing and tools of those involved in the incident must be double-bagged and labelled pending the outcome of the investigations by the asbestos consultant within sealed clear heavy-duty polythene bags which identify the location of exposure and the personnel involved.

6.2.5 Personnel exposed are to shower to remove potential fibres in hair and on body.

6.2.6 The shower room itself shall be used only by contaminated persons and sealed closed with tape for decontamination after final use. If a decontamination unit belonging to the university's asbestos consultants or licensed asbestos removal contractor is on site and arrangements can be made to utilise this equipment, then negotiations should be undertaken to use these facilities in preference to a university shower room.

6.2.7 Remediation of the affected areas will be undertaken by the university's licensed asbestos removal contractor in accordance with Health and Safety Executive (HSE) guidance, including air monitoring undertaken by the university's asbestos consultant.

6.2.8 For further actions please see the flow charts in appendix A.

6.2.9 Details of the emergency response procedure are detailed in the Estates & Facilities "Procedure for Asbestos Management" EF-ASU-02-PR04, appendix 3.

6.3 Accident/incident Investigation

6.3.1 All accidents/incidents relating to potential or actual disturbance, damage of asbestos containing materials or release of asbestos fibres must be reported on the university's web-based accident reporting system as soon as possible (including near misses).

6.3.2 Investigations will be conducted, according to the severity of the accident/incident, in accordance with **SPR006 - Accident reporting and investigation in King's College London**

6.3.3 All RIDDORs will be reported to the HSE by Health & Safety Services.

6.3.4 Guidance to accident investigation of asbestos fibre release events, post incident checklist and accident response/investigation flow charts are available to assist the responsible manager.

- GF011 - Accident Investigation Guidance Note
- F117– Post asbestos incident checklist
- F118 - Stage 1 and 2 Asbestos incident flow charts (A3 format)

7.0 WORKS – REACTIVE, MAINTENANCE AND PROJECT

7.1 Management Procedures

7.1.1 The flow charts in Appendices B and C outline university management procedures for planned maintenance, project works. Forms as identified in section 2.1 shall be used as appropriate.

7.2 Project Management for all Construction Works including Embedded Spaces

7.2.1 All Project Managers involved in construction works must:

- review the works with regard to the possible presence of asbestos.
- control of the works to ensure appropriate measures are taken to avoid damage or exposure.
- carry out necessary remedial or removal works (based on the ultimate long-term aim of asbestos safe working environment) and the impact of any remedial asbestos works on the project programme.
- seek assistance from the Technical Compliance Team regarding the Asbestos Register and involvement of the Asbestos Consultant, or other competent person at the earliest planning stages of a project.
- include information on the presence or otherwise of asbestos in pre-construction information as required by CDM 2015.
- Consider the risk of asbestos within soils if disturbance to the ground is planned

7.2.2 All refurbishment projects **including those in embedded spaces** must undergo the above review that will, unless agreed with the university's Asbestos Consultant or other competent person and recorded in writing; include a refurbishment or demolition survey. The only variation with embedded space will be that the Trust's registers are reviewed instead of the university's register.

Construction Design Management Regulations 2015 (CDM)

7.2.3 At the start of a project, a strategy should be developed on how to control and manage the asbestos risk implications. In most cases a F062 request should be submitted to find out known asbestos and access restrictions in any planned project area from The Electronic Asbestos Register (Planon).

7.2.4 The baseline level of asbestos information is assessed by Technical Compliance Team and returned with advice to be aligned to the scope of any planned works which is normally likely to need intrusive survey work (Refurbishment & Demolition Survey) on anything other than non-intrusive small scale work.

7.2.5 Instead of an initial F062, as an alternative for mainly significant major projects, a Refurbishment & Demolition Survey can be carried out aligned to the scope of planned works where the baseline (Management Survey) information is sent to the Asbestos Surveyor as part of The Survey Plan.

7.2.6 Factors to be considered at the early project life cycle/design stage include:

- The full extent of the survey and when it can be undertaken
- Whether the project provides the opportunity to remove asbestos in the area,
- Impact on the programme and if asbestos works are likely to be licensed (14-day notification).
- Determine how to procure asbestos abatement works i.e. enabling works or as part of the overall construction package.
- Could the Designers "design out" the risk by avoiding disturbing asbestos?

7.2.7 Having taken these factors into account, any residual risks (and relevant survey reports) from asbestos should be included in the Pre-Construction Information compiled by the Principal Designer. On appointment, the Principal Contractor, who is responsible for The Construction Phase Plan shall include for developing control systems to control the risk from asbestos and any other risk to health and safety during the construction phase

7.2.8 During the Construction Phase, the Principal Contractor shall be responsible for controlling all risks from asbestos.

7.2.9 Asbestos removal works are deemed 'Construction Work' and there is a requirement to comply with CDM Regulations 2015.

7.2.10 Should there be any project/scope changes during the construction phase then the level of asbestos information and survey scope is required to be reassessed and if required, further survey work is to be arranged.

7.2.11 At the end of the project, any residual asbestos left in situ or if there are any limitations from the works requiring ongoing management these are to be detailed in the Health and Safety File and a copy sent to Asbestos Assurance Team to enable Asbestos Register to be updated.

7.3 Permit to Work for Asbestos Works

7.3.1 The Estates and Facilities Permit to Work Procedure (EF-ASU-02-PR01) must be followed at all times.

- Before being issued with a permit to work, individuals will be required to read and understand the AMP as well as copies of relevant asbestos registers.
- Where practicable, project personnel should be made aware of the requirements of the AMP prior to tendering to ensure they allow for such requirements when quoting.
- Workers engaged in the removal or disturbance of ACM will only be issued with a Permit to Work if they are an Approved Licensed Asbestos Contractor.

7.4 Monitoring and Review

Re-inspections

7.4.1 All known and presumed ACMs left in-situ will be re-inspected by the Technical Compliance Team periodically based upon risk and detailed on the Asbestos Register. Please refer to the Estates & Facilities "Procedure for Asbestos Management" EF-ASU-02-PR04 for more details.

Record Keeping

7.4.2 King's College London Estates & Facilities shall maintain detailed records of all activities relating to asbestos works, which have been undertaken within and on King's College London premises. The records kept shall include:

- Copies of all asbestos survey reports, including updates and amendments.
- Records pertaining to the informing of King's College London employees about the presence of asbestos on site, and that such employees have been appropriately trained in safe work procedures and practices.
- Records of any asbestos abatement works performed on site.
- Clearance certificates indicating areas are safe to reoccupy after asbestos abatement works.
- Asbestos fibre air monitoring results.
- Face-fit test records for Respiratory Protective Equipment.

7.4.3 Records must be retained for a minimum of **40 years**

7.4.4 Accident and near miss records will be maintained by the Health & Safety Services via the online accident reporting system.

7.4.5 Occupational Health surveillance for King's College London personnel who carry out reinspection's and other specifically defined works, through agreement with the Technical Compliance Team, H&SS and Occupational Health will be maintained for a minimum of 40 years by Occupational Health.

7.4.6 It is also the policy of the King's College London to incorporate asbestos issues into building works contracts, designed to ensure any asbestos on, or in, King's College London premises is dealt with in the appropriate manner.

Review

7.4.7 It is required that the asbestos register is updated every time control actions are undertaken. This will necessitate the use of the Asbestos consultant, or other competent persons and the material assessment or priority assessment may differ following management actions. All the supporting documentation for control actions should be kept with the asbestos register, or at the very least, the location of supporting documentation be cross-referenced within the register.

7.4.8 Audits of reinspection reports and the maintenance of the asbestos register will be undertaken at random intervals by Health and Safety Services. The register is regularly reviewed and audited through the reinspection process by the Technical Compliance Team.

7.4.9 The Asbestos Management Plan will additionally be subject to review by Health and Safety Services and Technical Compliance Team annually or when there is a change in asbestos management staff, changes in legislation or guidance, following accidental exposures or near misses or whenever there is reason to believe the management plan is no longer adequate. The review shall critically review all the management processes and their effectiveness

Table 1: Determination of Appropriate Control Method for Asbestos

WHEN APPROPRIATE	WHEN NOT APPROPRIATE	ADVANTAGES	DISADVANTAGES
DEFER			
• Negligible risk of exposure • Asbestos inaccessible and fully contained • Asbestos stable and not liable to damage	• Possibility of deterioration or damage • Airborne asbestos dust exceeds clearance indicator	• No initial cost • Cost of removal deferred	• Hazard remains • Need for continuing assessment • Asbestos management programme required
ENCAPSULATE OR SEAL			
• Removal difficult or not feasible • Firm bond to substrate • Damage unlikely • Readily visible for regular assessment	• Deterioration beyond repair • Application of sealant may cause damage to material • Water damage likely • Large areas of damaged asbestos	• Quick and economical for repairs to damaged areas • Adequate technique to control release of asbestos fibres	• Hazard remains • Cost for large areas may be near removal cost • Asbestos management system required • Eventual removal may be more difficult and costly • LARC required under controlled conditions
ENCLOSE OR SEGREGATE			
• Removal extremely difficult • ACM can be completely contained within enclosure • Most of surface already inaccessible • Disturbance to, or entry into, enclosure area unlikely	• Enclosure itself liable to damage • Water damage likely • Asbestos material cannot be fully enclosed	• May minimise disturbance • Reduces risk of accidental damage • Provides an adequate method of control where encapsulation is not feasible	• Hazard remains • Continuing maintenance of enclosure • Asbestos management programme required • Need to remove enclosure before eventual removal of asbestos
REMOVE			
• High risk of exposure • Asbestos condition unstable, liable to damage and release of fibres	• Removal extremely difficult • In a good condition and extremely unlikely to be damaged.	• Removes or reduces the risk of exposure to asbestos fibres to below clearance indicator	• LARC operatives potential exposure to asbestos fibres during removal • Cost

REFERENCES

1. The Health and Safety at Work etc. Act 1974
2. The Control of Asbestos Regulations 2012
3. The Management of Health and Safety at Work Regulations 1999 (as amended)
4. The Hazardous Waste Regulations 2005
5. The Construction (Design and Management) Regulations 2015
6. The following are guidance designed to assist duty holders in fulfilling their statutory duties:
7. Work with materials containing asbestos. Control of Asbestos Regulations, ACOP L143
8. HSE Control of asbestos regulations guidance e.g., HSG227, HSG247, HSG248v2 and HSG264
9. Asbestos essentials publications; introduction and task manual, HSE.
10. Asbestos related HSE web pages - http://www.hse.gov.uk/asbestos/basics.htm
11. Asbestos Liaison Group
12. memos: http://www.hse.gov.uk/aboutus/meetings/committees/alg/memos_issued.htm
13. CL:AIRE JIWG CAR-SOIL – Interpretation for Managing and Working with Asbestos in Soil and Construction and Demolition Materials: Industry Guidance. (https://www.claire.co.uk/component/phocadownload/category/36-asbestos-in-soil)

APPENDICES

APPENDIX A **ASBESTOS MANAGEMENT PROCEDURES FLOW CHART – EMERGENCY RESPONSE – STAGE 1**

APPENDIX B **ASBESTOS MANAGEMENT PROCEDURES FLOW CHART – EMERGENCY RESPONSE – STAGE 2**

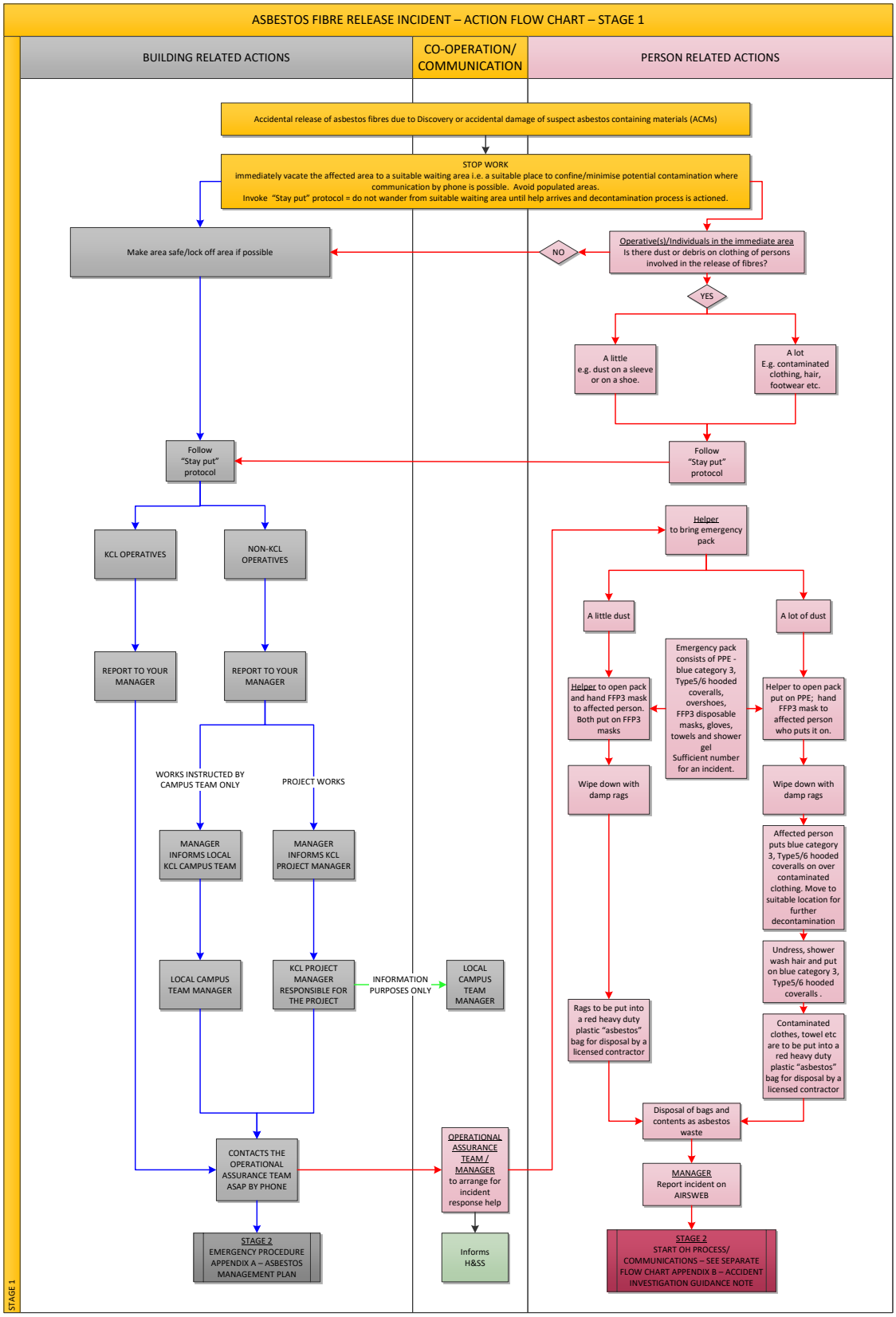
APPENDIX C **ASBESTOS MANAGEMENT PROCEDURES FLOW CHART – PROJECT WORKS**

APPENDIX D **ASBESTOS MANAGEMENT PROCEDURES FLOW CHART –MAINTENANCE AND REACTIVE WORKS**

APPENDIX E **DEFINITION OF CONSTRUCTION WORK**

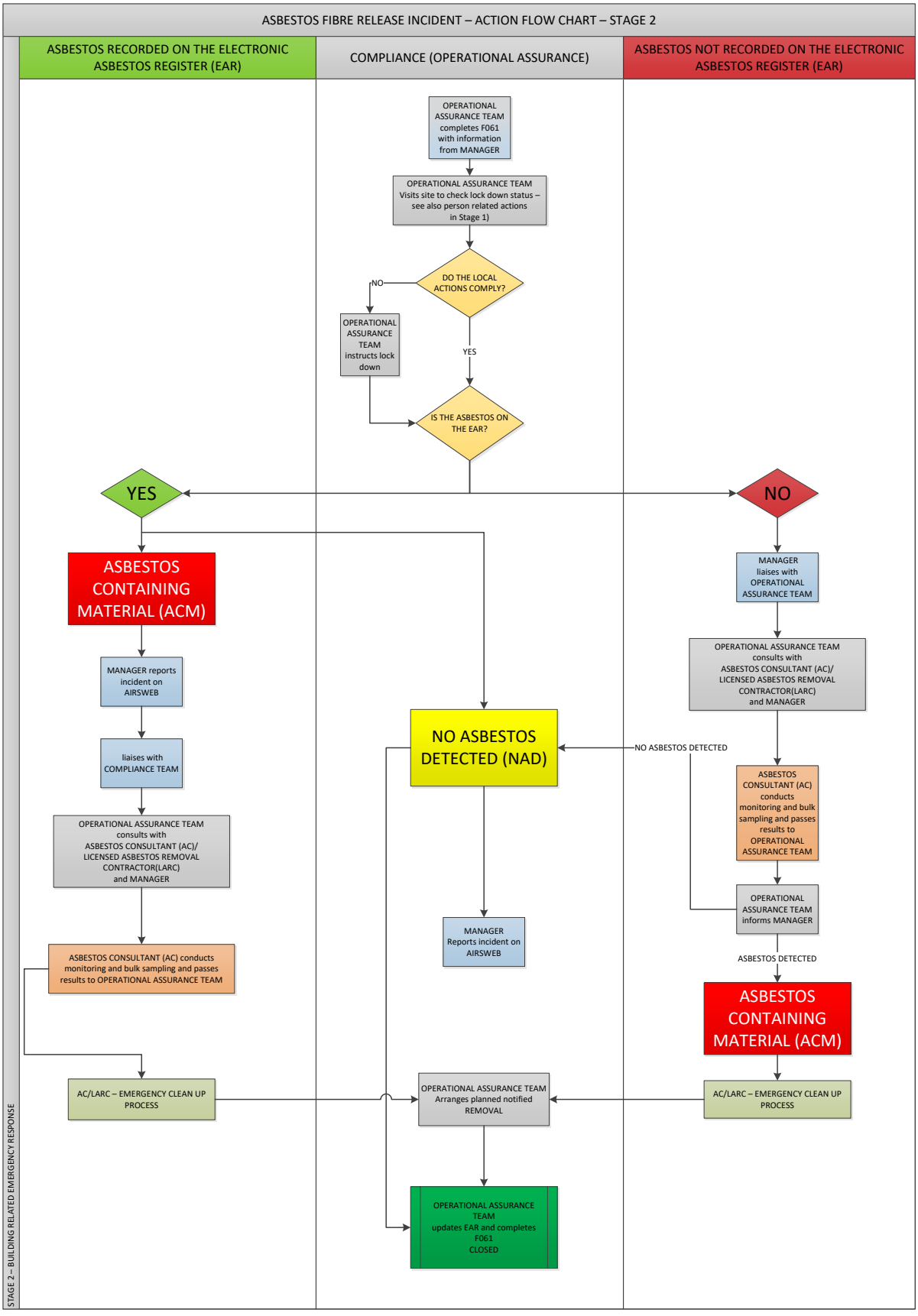
APPENDIX F **COMPETENCY MATRIX**

APPENDIX A ASBESTOS MANAGEMENT PROCEDURES FLOW CHART – EMERGENCY RESPONSE – STAGE 1

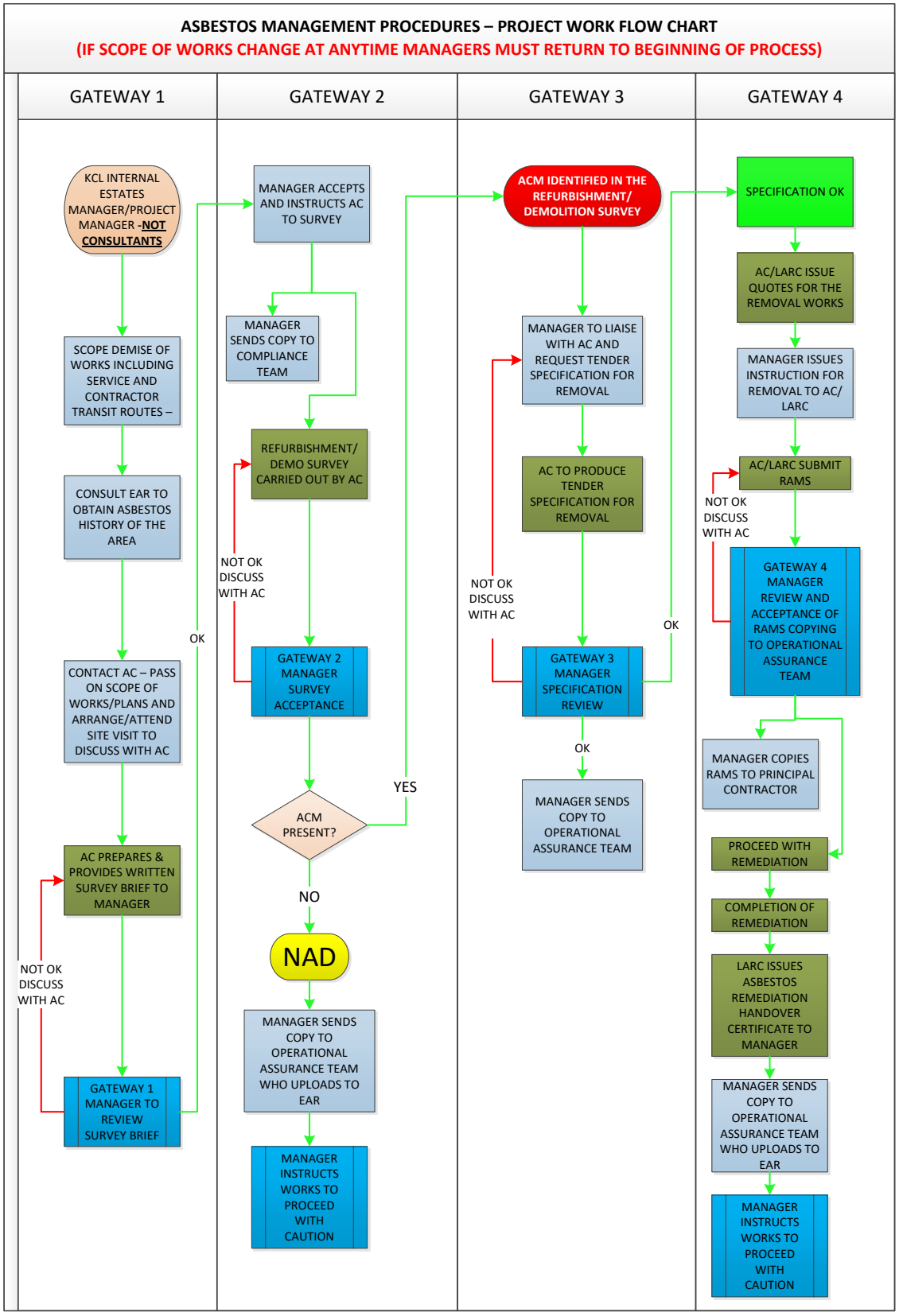


For stage two – Occupational Health process, communications etc. – see Health & Safety Services accident investigation guidance document.

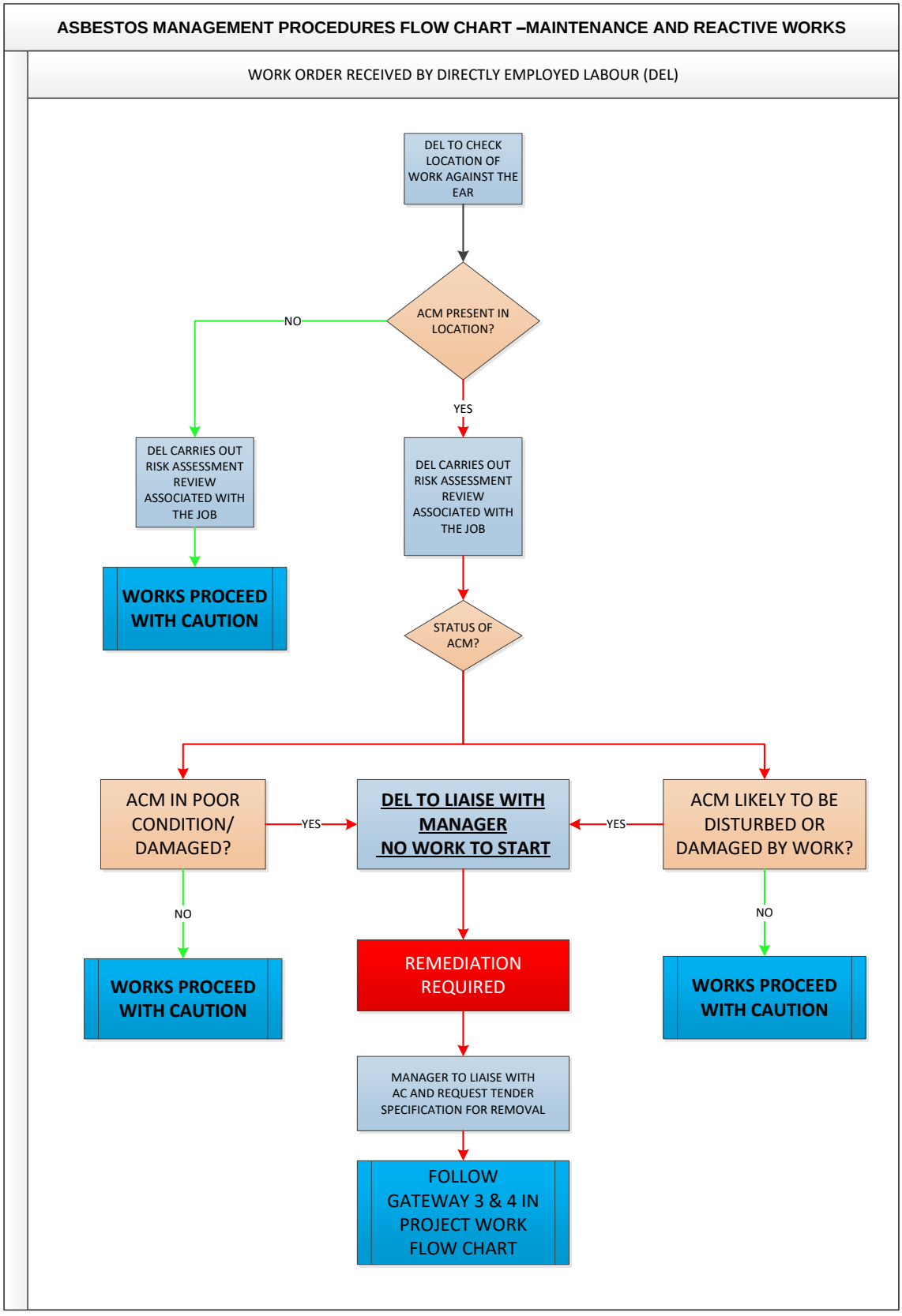
APPENDIX B ASBESTOS MANAGEMENT PROCEDURES FLOW CHART – EMERGENCY RESPONSE – STAGE 2



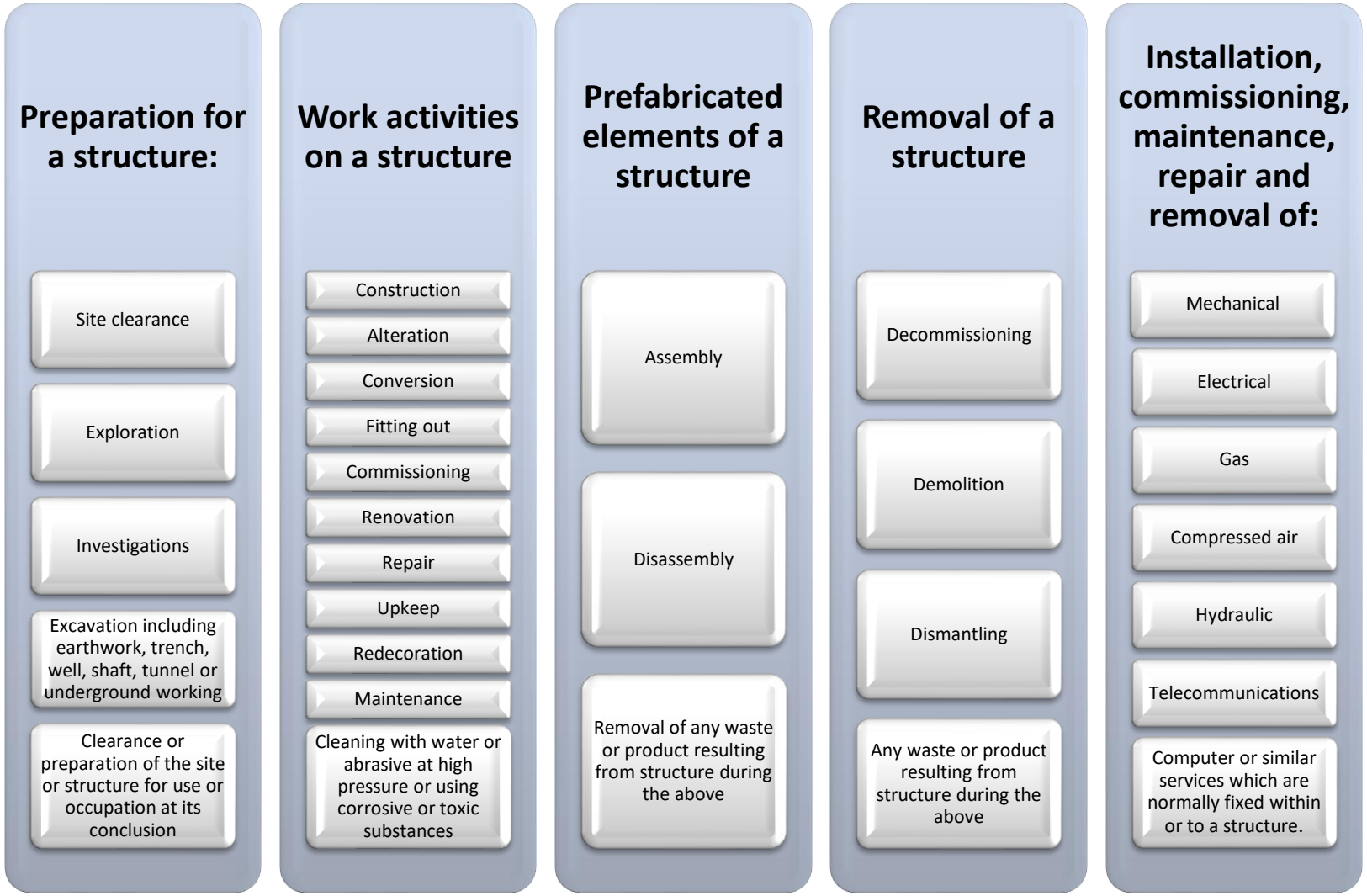
APPENDIX C ASBESTOS MANAGEMENT PROCEDURES FLOW CHART – PROJECT WORKS



APPENDIX D ASBESTOS MANAGEMENT PROCEDURES FLOW CHART – MAINTENANCE AND REACTIVE WORKS



APPENDIX E DEFINITION OF CONSTRUCTION WORK



APPENDIX F COMPETENCY MATRIX

Competency matrix with respect to asbestos management.	Asbestos Awareness - Year one and every three years	Asbestos Awareness for Managers - Year one and every three years	Asbestos Awareness for Project Managers - Year one and every three years	Asbestos Register Inductions	Asbestos Awareness e-learning - annual	BOHS module P402	BOHS module P402R	BOHS module P405 or similar	HSSSTM08 - Health & Safety for Managers and supervisors	HSSSTM04 - Accident Investigation	HSSSTM09 - General Risk Assessments	HSSSTM05 – Risk Assessments for COSHH	Company H&S training as per contract requirements
Responsible Persons (Asbestos)													
Estates & Facilities Head of Technical Compliance													
Estates & Facilities Technical Compliance Team													
Capital Projects - Directors													
Capital Projects - Project Managers													
Engineering – Directors, Managers, Team Leaders & Senior Maintenance Technicians/ Assistants													
Engineering – Asset Improvement Team													
Engineering – All Maintenance Technicians, Maintenance Assistants, Fabric Assistants													
Facilities Management (not Engineering) – Directors and Managers													
Facilities Management (not Engineering) – All Staff (e.g. porters, reception staff, administrators etc.)													
Residencies – Directors, Managers & Supervisors													
Residences – All Staff (e.g. porters, reception staff, administrators etc.)													
King's Sport, King's Venues & King's Food													

Mandatory **Mandatory where relevant to role** **Desirable**