

London School of Economics Policy for the Control of Asbestos

The aim of the London School of Economics and Political Science (LSE or 'the School') is to prevent or minimise the risk from asbestos to the public, staff, contractors and students, so far as is reasonably practicable, by effectively managing asbestos-containing materials (ACMs) and controlling work where ACMs are present in accordance with legislation. The asbestos regulations define 'work' with asbestos as removing, repairing or disturbing asbestos; associated ancillary activities and the supervision of the work. It is LSE policy that:

- No staff shall work on or with asbestos;
- Only competent and qualified asbestos-trained contractors shall work on asbestos;
- Competent and qualified asbestos surveyors shall be engaged;
- ACMs in good condition and unlikely to be disturbed shall be left in-situ and monitored regularly;
- Those ACMs vulnerable to damage shall be protected and monitored;
- ACMs that are damaged or have deteriorated shall either be repaired or safely removed;
- ACMs shall be removed prior to major refurbishment or demolition where reasonably practicable.

Further details can be found on the School's website.

Introduction

This document sets out the School's policy and covers the Aldwych campus, halls of residences and the sports ground at New Malden.

The policy includes performance objectives set by management, the roles of the designated responsible staff and their organisational relationships. The functional arrangements to which they must adhere are set out in the Asbestos Management Plan, also accessible on the School's website.

The School recognises that asbestos is present in areas of the properties under its control and that an effective strategy and associated procedures need to be in place in order to ensure, so far as is reasonably practicable, that the School is safe for normal occupancy and all maintenance and construction work is undertaken safely.

Statutory Requirements

There is much legislation that places duties on employers and employees. Primary legislation such as Acts of Parliament set out broad legal requirements that are then further developed in delegated legislation e.g., Regulations made by a body other than Parliament. It is a criminal offence to fail to comply with these statutory instruments. Regulations are supported by Approved Codes of Practice (ACoP) with a special legal status, and Guidance, which has no legal status. Failure to comply with an ACoP or its Guidance could be construed as failure to comply with the regulation and legal proceedings may follow. The level of statutory duty is that of 'so far as is reasonably practicable' (s.f.a.i.r.p.), which balances the quantum of risk against the cost of mitigating the risk. There are absolute duties preceded by 'shall' or 'must' e.g. prepare a safety policy and undertake risk assessments.

With regard to asbestos, the key items of legislation are outlined below:

- The Health and Safety at Work etc. Act 1974 (HASAWA) requires an employer to conduct their work in such a way that their employees will not s.f.a.i.r.p. be exposed to health and safety risks, to provide information about the workplace that might affect their health and safety and prepare and communicate a written Policy.
- HSG 65 Managing for health and safety provides a framework for putting in place effective arrangements for health and safety based on a Plan, Do, Check, Act cycle.
- The Construction (Design and Management) Regulations 2015 applies to all construction work. Longer projects with more workers become notifiable to the Health and Safety Executive (HSE). The client must ensure suitable arrangements are in place to manage the project, appoint a Principal Designer and Principal Contractor and provide pre-construction information to every designer and contractor. The client must also ensure that welfare facilities and a construction phase plan are in place before the start of the construction phase and a health and safety file is prepared.
- The Control of Asbestos Regulations 2012 (CAR) requires employers to prevent the exposure of their employees to asbestos, or where this is not practicable, to reduce the exposure to the lowest possible level. CAR includes a regulation placing a duty on those who have repair and maintenance responsibilities for non-domestic premises to manage the risk from asbestos in those premises. This Regulation is described more fully in the Management Plan. The Regulations define 'licensable work' and the specific exemptions relating to non-licensable work. The ACoP supporting the regulations, is 'Managing and working with asbestos' L143. Further details are to be found in the course manual accompanying the Asbestos Awareness training, which is available on the School's shared P: drive.

Asbestos

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

The fibres were incorporated into a wide range of products designed to exploit the unique properties of the fibres. The presence of these ACMs is not in itself dangerous unless they are disturbed or damaged. Anyone who becomes exposed to and inhales the respirable fibres released from ACMs is therefore at risk of developing the related lung diseases. Symptoms are not immediately apparent, there being a latency period between first exposure and the manifestation of symptoms. Mesothelioma can in particular be triggered by relatively low exposures with the victim being unaware that they inhaled the fibres, followed by a 15 to 50-year latency during which time there are no symptoms of disease but at onset mortality after 6 to 18 months.

Objectives

The School has and will continue to have in place:

- Asbestos surveys that identify and assess sources of risk from asbestos.
- An Asbestos Register that is accessible to all in-house staff and out-sourced contractors that may be brought into contact with asbestos as part of their work activities.
- A Management Plan that specifies the measures to be taken for managing the risk from asbestos including:
 - procedures for checking the register;
 - ensuring the information is understood and acted upon;
 - correct control measures are put in place;
 - competent asbestos-trained contractors carry out the work;
 - a timetable for abatement based on risk scores;
 - a schedule for monitoring ACMs;
 - a procedure to be followed in the event of an unplanned release of asbestos.
- Safe Working Practices in compliance of the Policy with all ACMs identified through appropriate labelling.
- A nominated senior manager to oversee and implement the Policy and Management Plan who can seek advice and guidance from external competent persons or companies.
- Monitoring and recording procedures to ensure that the measures put in place are adequate and effective.
- Regular training of all relevant personnel to ensure they have a level of knowledge and competence commensurate with their involvement in the control procedures.
- Review the risk assessments annually or if any significant changes occur to the system.
- Review the Policy annually and earlier if any legislation has been introduced or amended.

Roles and Responsibilities

Accountability for compliance rests with the Chief Operating Officer (COO) acting through the School Council who shall allocate sufficient resources in the pursuance of this Policy and audit the implementation of the Policy and procedures. Operational matters are delegated to named responsible persons as set out below.

Duty Holder: Director of Estates

The Director of Estates is responsible for all strategic aspects of the School's properties including consideration of asbestos issues:

- Assembling and maintaining a suitably qualified Asbestos Management Team consisting of the following:
 - Head of Maintenance
 - Asbestos Manager
 - Deputy Asbestos Manager.
- Ensuring that the team has adequate time and resources to enable them to fulfil their responsibilities, and retaining approved consultants and removal contractors;
- Supporting applications by the Directors of Capital Development and Facilities Management for necessary or anticipated resource allocation and funding from the Chief Operating Officer;
- Reviewing the progress of asbestos issues relevant to all projects with the Asbestos Manager on an annual basis;
- Meets the Asbestos Manager annually after the scheduled policy review and presents to the Safety Management Board for approval.
- Facilitates the annual external audit of the policy, procedures, and management plan as instructed by the COO via the Audit Committee;
- Attend Safety Management Board to represent Estates.

Director of Facilities Management, Assistant Director of Facilities Management, Capital Development and Residences and Catering Services are responsible for:

- The application for and subsequent allocation of funding towards the optimum management of asbestos;
- Considering and acting on advice from the Asbestos Manager on the inclusion / suspension / removal of asbestos related consultants / contractors;
- Discharging to the Asbestos Manager operational requirements within the agreed policy and financial framework;
- All Estates staff under their direct control, ensuring the Asbestos Manager arranges sufficient and suitable initial and updated training with respect to asbestos issues where appropriate;
- Ensuring that the Asbestos Manager is advised of all new members of staff that require training including details of any previous training;
- Deputising for the Director of Estates on the Health and Safety Management Committee.

Asbestos Manager is responsible for implementing asbestos policy at the operational level. With particular responsibility for:

Asbestos Register:

- Project manage the collation of the School's asbestos register for all buildings within the portfolio where the School is the 'duty holder', including all new acquisitions;
- Maintain the register and keep records up to date through information provided by other Estates staff and through works undertaken by the Asbestos Manager;

Managing Asbestos Materials:

- Implement a pro-active Management Plan including prioritising action for removal / encapsulation and re-inspection as determined by the risk assessments;
- As necessary raising awareness and understanding of asbestos with all staff and advising departmental administrators/Building Managers of the location of asbestos within their working areas;
- Manage asbestos request for information process to enable non-Estates staff in other departments, external consultants and contractors to make requests for information regarding asbestos, carry out appropriate levels of investigation and provide a documented response to those requests;
- Assess, review and recommend management action following periodic inspections, changes in regulations and / or current good practice.

Managing Remedial Works:

- Overseeing contracts associated with the repair or removal of ACMs prior to maintenance, refurbishment or construction work and evaluating contractor method statements;
- Inspect materials thought to contain asbestos that are not on the register and advise on sampling and /or remedial action that should be taken;
- Assess the appropriate level of analytical support and attendance;
- Appointing the School's asbestos surveyors, analysts and HSE licensed asbestos removal contractors through a qualitative and commercial based procurement route in accordance with the School's standard Financial Regulations;
- Monitor the performance of appointed contractors and consultants to assess their compliance with statutory requirements and competence to carry out asbestos related works and report and discuss deficiencies with the Director of Capital Development and make recommendations.

Informing, Liaising and Educating:

- Inform appropriate staff and liaise with building/departmental administrators in respect of asbestos related works;
- Instruct, direct and liaise with the School's appointed asbestos surveyors, analysts and HSE licensed asbestos removal contractors.

- Preparation of technical procedures and policy documentation;
- Chair the annual asbestos management team meetings;
- Annually review technical procedures and Policy documentation;
- Review and implement relevant recommendations from audits of the Safety Management System commissioned by the School;
- Participating in the organisation and implementation of asbestos awareness and regular refresher training sessions for Estates/DTS staff.
- Respond to Asbestos Management Request forms as required, retain a record of requests and responses.

Record Keeping:

- Updating the Asbestos Register on an annual or bi-annual basis depending on the level of refurbishment works;
- Updating the asbestos drawings on an annual or bi-annual basis depending on the level of refurbishment works;
- Ensure that all statutory documents generated by the asbestos works are properly completed and a record kept as and when the works are carried out;
- Keep detailed project records relating to asbestos remedial or investigative works as and when the works are carried out;
- In the event of an uncontrolled release of asbestos fibres, ensure a log of the incident is forwarded by the Project Manager or Maintenance Supervisor to the Asbestos Manager and kept on file.
- Notify the LSE Head of Health and Safety and Director of Human Resources of any uncontrolled release of asbestos fibres so that a note of the exposure is made on that employee's health record or their personal file as deemed necessary. Students and visitors should be informed;
- Notify the Head of Health and Safety if that uncontrolled exposure is likely to be at or above the Control Limit or not sporadic and low intensity, for the purposes of RIDDOR.
- Maintaining annual financial records to ensure budgetary control is achieved and advise the Director of Capital Development of future financial requirements;
- Quality assurance by audit of procedures will be undertaken, generally annually or bi-annually in line with tasks noted above. The findings will be used in future training sessions to reinforce knowledge and correct failures of policy or procedures.

Deputy Asbestos Manager will assist the Asbestos Manager with all their responsibilities. They shall:

- Assist the Asbestos Manager in the undertaking of their responsibilities as directed;
- Deputise in the absence of the Asbestos Manager.

Project Managers are responsible for works carried out by external consultants and contractors as well as in-house staff involving mechanical, electrical, public health investigation and building works. They shall:

- Adhere to the School's Asbestos Policy and Management Plan;

- Attend all training as instructed by the Asbestos Manager;
- Deputise in the absence of the Asbestos Manager or Deputy Asbestos Manager and the Head of Maintenance, by close liaison with the asbestos consultant who should be sought for advice in every instant;
- Assess areas prior to projects starting to identify any known risk from asbestos by interrogating the Asbestos Register on Planon and, if appropriate, requesting in consultation with the Asbestos Manager, a localised Refurbishment and Demolition survey;
- Halt work and seek advice from the Asbestos Manager if informed by staff or contractors that suspected asbestos material is discovered during the course of a project;
- Implement the recommendations of the Asbestos Manager;
- Inform external consultants and contractors of the location of any known asbestos affecting a project;
- Ensure that all consultants / contractors engaged by the School have trained their staff in asbestos awareness, consult with the Asbestos Manager as required;
- issue a copy of the Planon Asbestos Register to the CDM Adviser and Contractor for consideration in the pre-construction and Construction Phase H&S Plan.
- Arrange for a Licensed Asbestos Removal Contractor (LARC) to undertake remedial works. Ensure a qualified Analyst is in attendance if required.
- Ensure that all project information is passed to the Asbestos Manager at completion and project handover including the updated Planon Asbestos Data Loader to the Planon Administrator and Asbestos Management Team;
- Check that contractors have reviewed the Asbestos Register and Surveys prior to commencement of work.

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

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

- Ensure that the asbestos register is interrogated by all maintenance/IT staff prior to them undertaking maintenance/IT tasks;
- Ensure that all maintenance/IT/security/Residences contractors employed by the School have trained their staff in asbestos awareness, consult with the Asbestos Manager as required;
- Liaise with the Asbestos Manager in the event of an uncontrolled release of asbestos fibres.

The **Estates Helpdesk** is the essential link in the chain between request and completion. The Job Request Form is the mechanism by which internal works orders are generated and allocated to maintenance staff. The Helpdesk is a portal to Planon so the Helpdesk staff can confirm on Job Requests the presence of ACMs while Maintenance Supervisors shall be trained on Planon to facilitate interrogation of the register in response to staff queries. Both these parties may be the first to receive calls regarding uncontrolled releases and will therefore need to work closely with the Asbestos Manager and Estates personnel to coordinate a swift response.

Estates/ DTS Staff and Contractors are responsible for:

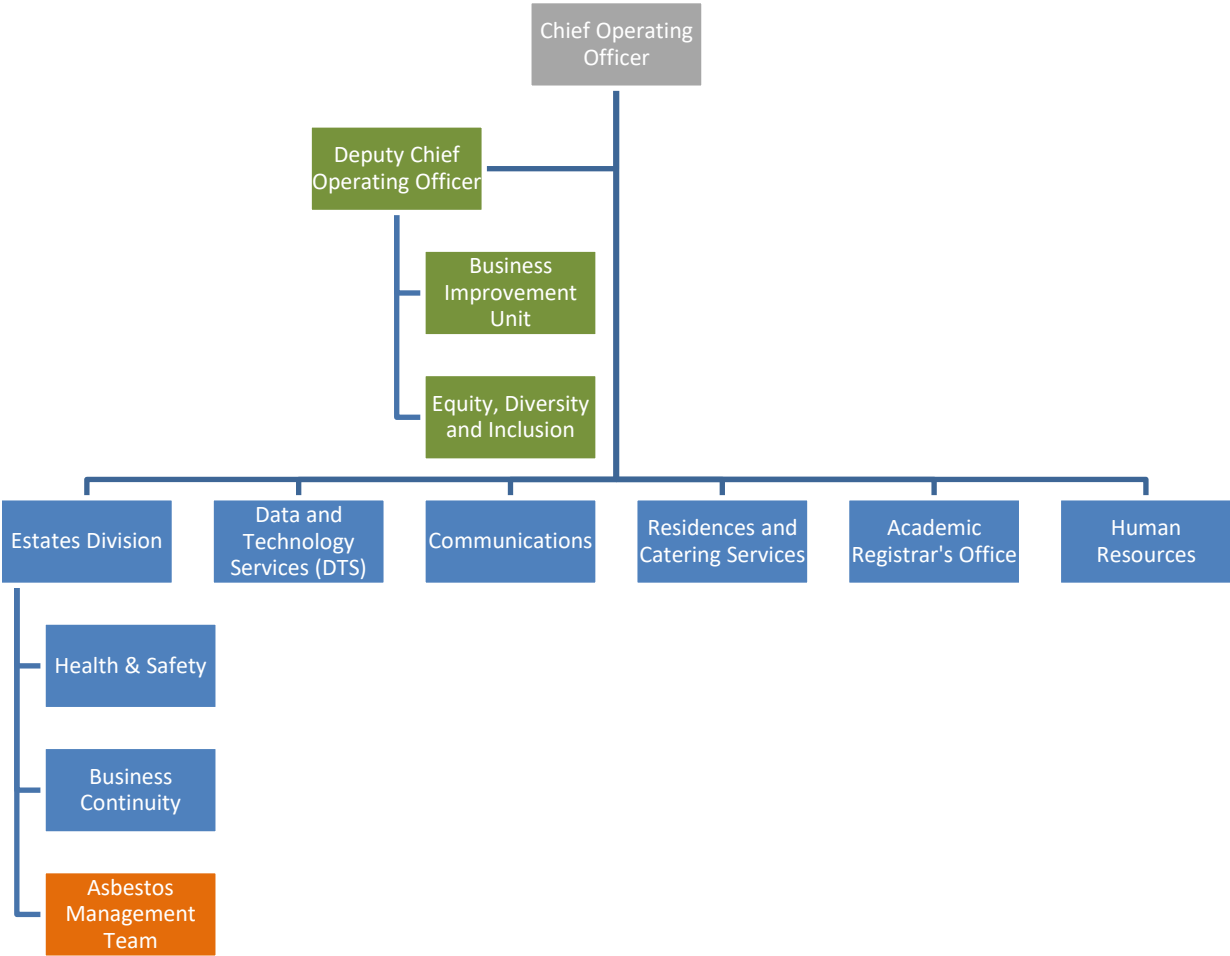
- Attend all training as instructed by the Asbestos Manager; Ensuring that any work that may disturb or damage a material containing asbestos is avoided;
- Contacting the Asbestos Manager either directly or via their line managers and ensuring that the School's Asbestos Management Plan and Policy is adhered to when work cannot be completed without disturbing asbestos;
- Halting work and seek advice from the Asbestos Manager if suspected asbestos material is discovered during the course of the works either but before disturbance;
- If a material is disturbed and subsequently suspected of being an ACM, emergency procedures must be implemented and the Asbestos Manager, their line managers or the Helpdesk immediately informed.
- Adhering to the School's Asbestos Management Policy;

The **Health & Safety Team** shall:

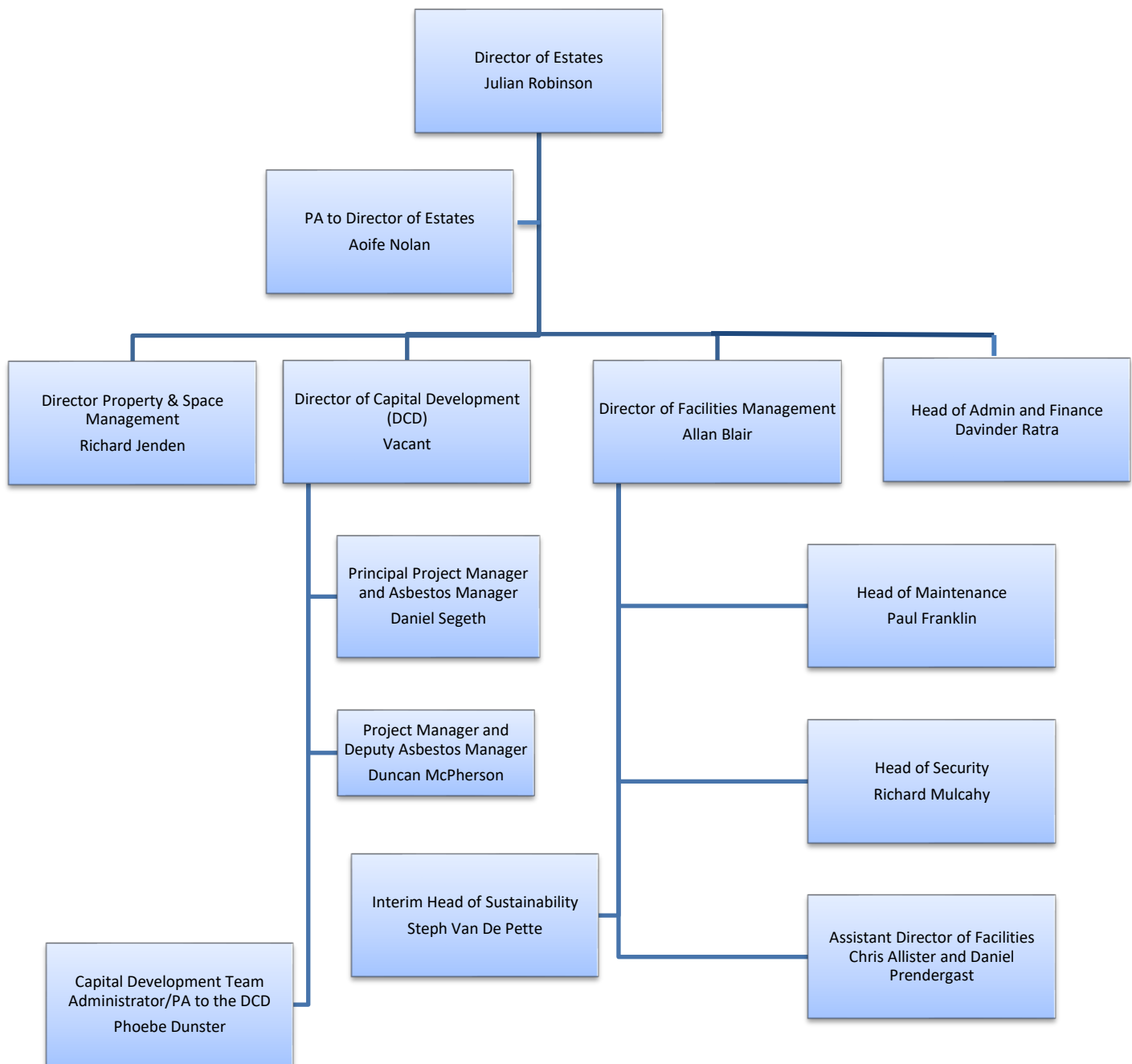
- Report incidents under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR) where an uncontrolled release of asbestos has resulted in concentration at or greater than 0.1f/ml over a 4-hour period, or at or greater than 0.6f/ml over a 10-minute period as determined by the results of air monitoring undertaken by a UKAS accredited analyst;
- At meetings of the Safety Management Board, report incidents that result in an uncontrolled release of asbestos fibre and liaise with the Director of Estates and Asbestos Manager as appropriate;
- Assist the Asbestos Manager in the investigation of uncontrolled releases when requested.

Management Structure

Overall Operations



Management Structure – Estates Division



Management Structure - Committees and Meetings



Policy Review

(<https://info.lse.ac.uk/staff/divisions/estates-division/about-us/asbestos-management>)

This policy shall be reviewed annually at a meeting of the Asbestos Management Team, or as required by the Audit Committee, or in response to a specific incident.

Review schedule

Review interval	Next review due by	Next review start
Annual	01/03/2024	05/01/2024
Annual	17/02/2025	13/02/2026

Version history

Version	Date	Approved by	Notes
1	27/01/2014	Health and Safety Management Committee	Overhaul of doc
2	27/01/2015	Director of Estates	Change of Regs/minor revisions
3	22/04/2016	Director of Estates	Minor Revisions
4	24/04/2017	Director of Estates	Revisions following CDM Review
5	13/04/2018	Director of Estates	Minor Revisions
6	12/03/2019	Director of Estates	Changes associated with External Audit – Feb 2019
7	24/05/2019	Director of Estates	Amendment to Asbestos Manager designation
8	14/06/2021	Asbestos Management Team	Minor amendments, deputy asbestos manager change.
9	02/10/21	Director of Estates	Minor amendments, deputy asbestos manager change.
10	20/02/23	Director of Estates	Minor amendments by Adams Environmental and Asbestos Management team; name of Estates Director PA; Add Head of Sustainability name; Added Director of Estates to Management reporting structure.
11	April 2023	Safety Management Board	Approved the document with revisions.
12	July 2024	Director of Estates	Minor formatting updates; change of personnel including the Asbestos Manager.

13	February 2025		Update to personnel details and organograms
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Emergency Contacts

Position	Name	Contact Details	Title
Out-of-hours emergency contact	Environmental Essentials	02071750534 Lsehelpline@environmentalessentials.co.uk	EE Helpline
Principal Project Manager	Daniel Segeth	M: 07718 928957 E:d.j.segeth@lse.ac.uk	Asbestos Manager
Project Manager	Duncan McPherson	M: 0777 8000 677 E:D.Mcpherson1@lse.ac.uk	Deputy Asbestos Manager

Communications and Training

Will this document be publicised through Internal Communications?	Yes
Will training needs arise from this policy	Yes
If Yes, please give details Document published on LSE website. Revised documentation will be part of Asbestos training agenda - 2025	