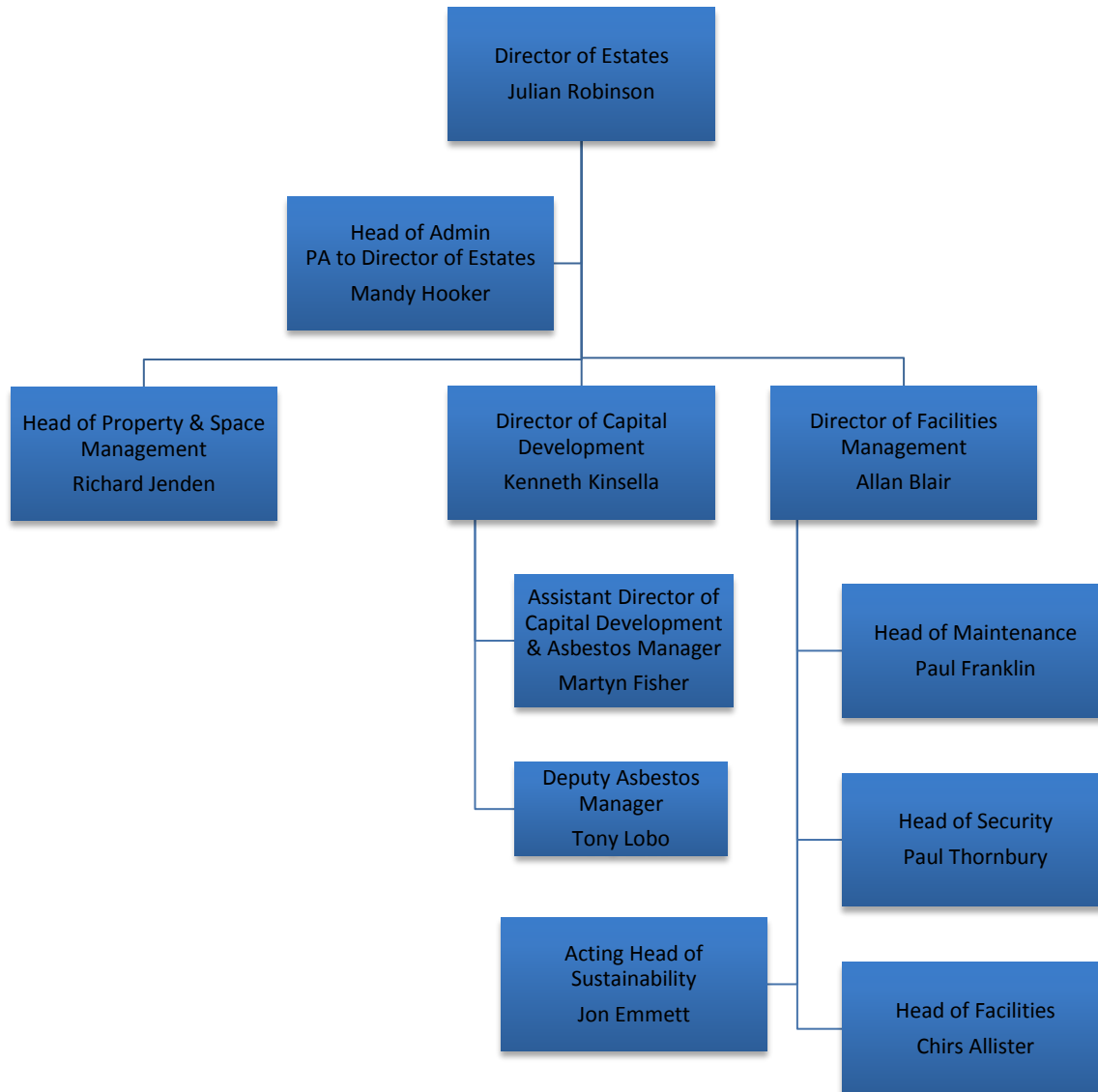




5.2 Management Structure – Estates Division



5.1 Management Options

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

Monitor

Periodic inspections at intervals of 12 or 24 months depending on the risk priority.



Label	Appropriate warning labels have been applied to or adjacent to the majority of the School's known asbestos.
Protection/enclosure	A physical barrier such as timber casing protects some of the asbestos in the School. The casing should be sealed and as air tight as possible to prevent migration of fibres.
Seal/encapsulate	There are two methods of encapsulation: applying a durable layer adhered to the surface of the ACM such as PVA, or a material that penetrates the ACM before hardening which locks the material together. Both methods are reported to have a life of 20 years if undisturbed.
Repair	Repair will only be undertaken if the damage is slight. There are a number of methods including; filling, wrapping, localised encapsulation, PVA sprayed solution etc. All repairs use non-asbestos materials.
Permit to work	<p>Permit to work procedures exist throughout the School and will apply to areas that contain ACMs that have been identified as high risk to maintenance workers;</p> <p>A permit to work must be obtained prior to any works commencing. All areas that require a permit will have asbestos clearly labelled. To obtain a works permit you must provide a method statement and risk assessment for the relevant and project specific works. Included in this you must appoint and provide details of a dedicated supervisor including their name, contact number and position in our company. Each method statement and risk assessment must be identifiable by a unique reference number.</p> <p>Application should be made to LSE Head of Maintenance, Estates Division, Houghton Street, London WC2A 2AE.</p> <p>In very high-risk areas, the School will provide method statements identifying specific sequences of works required for safe working.</p>
Periodic air test	Where there is a high level of asbestos in a confined space (for example, Peacock Theatre auditorium void) with a history of unauthorised disturbance, periodic air tests are undertaken to confirm safe access. This is coupled with the permit to work scheme.
Remove	<p>The HSE recommend against unnecessary removal of asbestos as if undertaken without due consideration there is a potential to increase risk of harm. ACMs will be removed where it is found to be in poor condition and repair etc. is not possible, or it is impossible to undertake maintenance works without disturbing the materials, or refurbishment works are due to be undertaken.</p> <p>Removed asbestos is omitted from registers over time but records are archived and retrievable if required.</p>

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

5.2 Monitoring Arrangements

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

6.0 Asbestos Surveys

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

Surveys shall be in accordance with the survey types described in HSE Guidance "**Asbestos: The survey guide**" **HSG 264**⁸ i.e., either Management Surveys or Refurbishment and Demolition Surveys, depending on requirements carried out by the School's appointed asbestos surveyors.

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

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

6.2 Management Surveys

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

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

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

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

These are available on the Estates shared P:Drive under Legal Compliance.

6.3 Refurbishment and Demolition Surveys

This type of survey is required before refurbishment, alterations or demolition works and will be carried out by the appointed asbestos surveyor.

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

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

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

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

These are available on the Estates shared P:Drive under individual project folders.

6.4 Priority Assessments

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

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

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

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

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

7.0 Asbestos Register

7.1 Planon

The Asbestos Register has been integrated into a web-based interactive database called Planon, which records amongst other things the location, extent and condition of all known and presumed ACMs identified in the survey reports on the School's master set and current general layout drawings.

These are also available on the Estates shared P:Drive under Legal Compliance. In addition hard copies of the register [and drawings] are available from all Estates Supervisors and Facilities Managers on campus and halls of residences respectively.

Any person undertaking works within a School building who does not have access to Planon, hard or electronic copies must complete an Asbestos Information Request Form which can be obtained from the Asbestos Manager, Helpdesk or Maintenance Supervisor.

Contractors obtain copies through Maintenance Supervisors, Project Managers or Facilities Manager. Contractors to confirm prior to the commencement of works that they have received, read and communicated both the policy and register details to their operatives.

Relevant details/information shall be made available to the emergency services via Security Supervisors in the case of accessing fires.



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

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

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

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

7.2 Continued Monitoring of ACMs

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

7.3 Revising the Management Plan

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

8.0 Procedures

8.1 Removal of Asbestos

For the avoidance of doubt, the School has the policy that no employees of the School will remove asbestos.

8.2 An Uncontrolled Escape of Asbestos Fibres

In the event of an uncontrolled release of asbestos fibre, immediate steps will be taken to mitigate those effects; restore the situation to normal and inform any persons affected. The Flow Chart in Appendix 2 is a schematic of the actions to be taken for four common scenarios that show how the scale of the problem leads to decisions and actions along a particular pathway. There is therefore no single reaction to all incidents: the severity of the situation should elicit a proportionate response. The use of this Flow Chart is important and shall be covered in training sessions.



8.2.1 Severe Damage

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

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

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

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

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

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

8.2.2 Slight Damage

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

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

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

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

8.3 Record of Exposure and Health Checks

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

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

8.4 Reporting Damage

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

Where the material is damaged see item 8.1.

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

8.5 Access into an Asbestos Enclosure

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

8.6 Building Refurbishment Works or Demolition

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

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

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

Where the Asbestos Manager recommends the removal of the asbestos material a HSE licensed asbestos removal contractor and analyst shall be engaged in accordance with the

School's procedures for procuring services from contractors. The asbestos removal works should be carefully programmed into the project so as to minimise damage to the asbestos and prevent or reduce exposure.

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

All contractors working for the School have responsibilities as outlined in the School Policy relating to procurement of their services. Standard pre-qualification processes should make sure that all appointed contractors possess core competences in dealing with asbestos.

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

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

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

8.7 Building Alteration Works Including Services

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

These works may be seemingly trivial but can have unexpected consequences if not properly considered beforehand, e.g. changing door furniture, shelf fixing, opening voids for access, and other routine maintenance activities. Reference should be made to the asbestos awareness training manual to appreciate the range of ACMs commonly used in construction, plant and fixtures and fittings.

8.8 Maintenance Works Including Services



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

8.9 School has an interest in a property but is not the Duty Holder

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

8.10 Asbestos Information Request

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

If this is required for project works adequate time should be given to enable paperwork to be processed, surveys etc., to be undertaken and remedial works to be carried out or allowed for in the overall project. A 14-day notification period is mandatory with respect to licensable work on ACMs, e.g. sprayed coatings or pipe lagging. A waiver is only allowed for emergencies. Low-risk work is neither licensable nor notifiable e.g. vinyl floor tiles and resinous cisterns. Tasks involving AIB are mostly licensable. Only competent persons such as the HSE Licensed Asbestos Removal Contractor shall assess and recommend whether works are notifiable or non-notifiable, licensed or non-licensed works.

All requests for Refurbishment and Demolition surveys should include extensive details of the intended project works including drawings, schedules of works, start and completion dates and the like.

8.11 Job Request Form

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

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

A hard copy Asbestos Register is available for reference in the Maintenance Supervisor's office and copies are maintained on-line. All relevant staff will be trained on asbestos awareness (new starters will be signed up to attend the first available training session) and will follow best practice.



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

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

Details can be found on:

www.lse.ac.uk/collections/estatesDivision/Asbestos_Policy/Procedures.htm

9.0 Training Arrangements

9.1 New Estates and IMT Staff

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

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

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

Staff disciplines requiring annual training are:

- Capital Development Project Managers
- Moves Manager
- Maintenance Supervisors and Operatives
- Security Supervisors and Technicians
- IMT Supervisors and Technicians
- Residences Service Managers and Facilities Managers
- Head Groundsman and Assistant at the Sports Ground
- Building Manager and sub-tenants technicians at Peacock Theatre.

9.2 Refresher Training

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

9.3 Additional Training



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

9.4 Contractors

All contractors undertaking asbestos removal, construction works, maintenance tasks or IMT/AV/security installation shall confirm that all their operatives have undertaken asbestos awareness training in the last 12 months.

10.0 Implementation, Review and Audit of the Policy

http://www.lse.ac.uk/collections/estatesDivision/Building_Services_Org.htm

10.1 Policy Review

Asbestos Management Team meetings will be held annually and attended by the Asbestos Manager, the Head of Health and Safety and Head of Maintenance to review the Policy for the Control of Asbestos, agree any necessary revisions and obtain approval of the Duty Holder.

10.2 Internal Policy Audit

The Head of Health and Safety together with the School's approved Health and Safety auditor will periodically undertake an audit of the implementation of:

- Asbestos Management Policy
- Asbestos Management Plan.

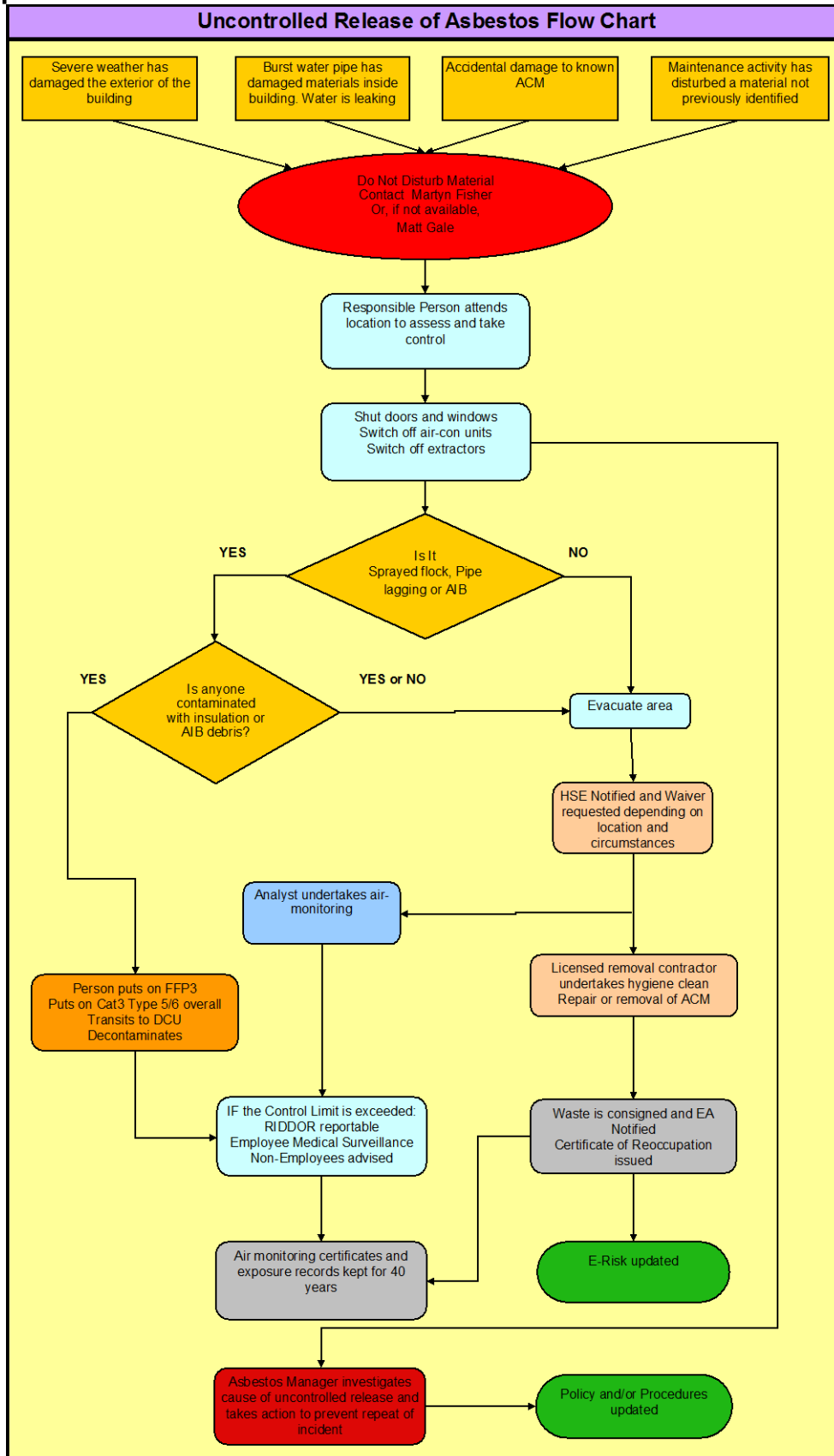
Their findings will form the basis of a report for the Asbestos Manager to review and implement.

10.3 External Audit

External audit may be conducted by independent Health and Safety auditors in response to a project –specific incident or general School audit procedures who shall report directly to the Director of Estates and whose findings shall be given due consideration and implemented.



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



Appendix 3 References

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