

Estates Management Arrangements and Procedures
EMAP02 – Asbestos Management Plan



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1. General Arrangements

1.1 Purpose

The purpose of the Estates & Facilities Directorate's asbestos management arrangements and procedures is:

- To manage all asbestos containing materials (ACM's) in full compliance with the management arrangements identified in Regulation 4 of the Control of Asbestos Regulations 2012
- To prevent exposure to the health hazards associated with asbestos
- To remove all ACM's as far as is reasonably practicable.
- To appoint an accredited independent asbestos consultant, currently Fibre Management Limited (FML) undertake sampling, testing and project management at QMUL.
- To promote asbestos awareness and understanding of asbestos management
- To provide and maintain an asbestos register.
- To provide information, via asbestos surveys, registers or sampling, for those working with or near known ACM's prior to any works being undertaken
- To assess the condition of known ACM's through regular inspection.
- To learn from any asbestos incident through detailed investigation.
- To develop and implement effective asbestos management arrangements and keep such arrangements under regular review.

1.2 Legislation, Codes of Practice and Guidance

1.2.1 Primary Legislation (available at <http://www.hse.gov.uk/index.htm>)

The following documents provide the primary legislation;

- The Health and Safety at Work etc Act 1974 (HSWA)
- The Control of Asbestos Regulations 2012 (CAR)
- The Construction (Design and Management) Regulations 2015 (CDM)
- The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013
- L143 (2nd Edition) Managing and working with asbestos

1.2.2 Guidance

The following documents and website provide guidance from the Health and Safety Executive (HSE) on asbestos;

- HSG 264 (2nd Edition) Asbestos: The survey guide
- HSG 210 Asbestos essentials
- INDG 223 (Rev 5) Managing asbestos in buildings (A brief guide)
- <http://www.hse.gov.uk/asbestos/index.htm>.

The following internal document relating to asbestos management is available on the HSD Connect webpages at <http://www.ohsd.qmul.ac.uk/>

- Asbestos Policy (Ref: QMUL/HS/099)

2. Responsibilities

2.1 Roles and Responsibilities

The following roles have been identified as having a key function in the management of asbestos at QMUL. Nominated individuals are to accept responsibilities by a signed acceptance memorandum (Appendix G)

Lines of Responsibilities and Communication are included within Appendices (C) & (D).

- Duty Holder
- Duty Holder's Representative
- Authorised Person
- Responsible Persons
- Responsibilities of any person commissioning any work which involves asbestos
Including major refurbishment or any intrusive maintenance

2.2 Duty Holder

QMUL is the duty holder under the Control of Asbestos Regulations 2012; this duty shall be undertaken by the Principal hereafter called the 'Duty Holder'.

2.3 Duty Holder's Representative

To ensure that all ACM's across the QMUL estate are suitably controlled and managed with appropriate resources, this duty shall be delegated to the Director of Estates and Facilities hereafter called the Duty Holder's Representative.

Reporting to:

- Duty Holder

Responsibilities

- To represent the Duty Holder and assume responsibilities for formally issuing reports on the management of asbestos
- To be the single point of contact for the Health and Safety Executive (HSE) in the event of an enquiry (HSD should be advised of any such enquiry).
- To formally appoint an Authorised Person and a Responsible Person to take day to day responsibilities for the management of asbestos.
- To approve asbestos removal programme budgets and when advised by the Responsible Person, approve additional expenditure for testing, investigation and auditing of processes of in respect of asbestos.
- To ensure that all Departmental Employees understand their responsibilities identified in these procedures.

2.4 Authorised Person

The Assistant Director of Estates and Facilities (Infrastructure and Maintenance) should have a background in the role of health and safety, and ensure that senior management understand their obligations on the management of asbestos

Reporting to:

- Duty Holder's Representative

Responsibilities

- To agree the long term strategy for the management of asbestos.
- To ensure the on-time submission of budgets and projects to include costs for the identification and treatment of asbestos.
- To liaise with the senior management team to ensure that the asbestos management plan is being effectively managed.
- To commission external audits of the asbestos management arrangements, every 3 years.
- To ensure that suitable and sufficient risk assessments are prepared for the management of asbestos.
- To ensure arrangements are in place to assess the competency of the Responsible Persons.
- To undertake the management of asbestos.
- To formally appoint in writing, the Responsible Persons.
- To monitor that the Responsible Person is suitably informed, instructed and trained to undertake their duties in a safe and technically competent manner.

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- Ensure the policy and procedure is reviewed and updated annually or if any significant changes occur in the legislation.
- Ensure a UKAS accredited Asbestos Consultant is appointed to undertake any ad-hoc sampling.
- Undertake regular auditing of the asbestos management arrangements in place, producing an audit action plan and ensuring all outstanding actions on the action plan are dealt with in a timely manner.

2.5 Responsible Person

The Estates and Facilities (Infrastructure and Maintenance) Compliance Manager undertakes the role of the responsible person. The responsible person shall have competence in, and knowledge of, the management of asbestos to ensure suitable control measures have been identified.

Reporting to:

- Assistant Director of Estates and Facilities (Infrastructure & Maintenance)

Responsibilities

- To undertake the day to day function of asbestos management across the university and act as the central point of contact for asbestos related matters.
- Arrange for management surveys to be undertaken at all university buildings unless there is documented evidence to show they were built after 1999 (when the supply and use of all forms of asbestos was prohibited in the UK) and are asbestos free. Consideration should be given to adjoining structures and equipment that has been brought in from other buildings in addition to date of construction.
- Ensure all refurbishment or demolition works carried out in buildings that were constructed prior to 1999 are not commenced until a refurbishment and demolition survey has been completed.
- Ensure all asbestos incidents are investigated, details recorded and recommendations implemented.
- Advise on changes in legislation and associated implications which may impact on these procedures.
- Ensure that records of exposure to asbestos are maintained.
- To ensure the lines of communication are clear, unambiguous and audited to ensure they are effective.
- Review record keeping procedures.
- Monitor performance of asbestos framework consultant.
- Monitor performance of asbestos removal contractors.
- Manage the asbestos PTW system
- Deliver, or arrange the delivery of, asbestos awareness training
- Implement arrangements to ensure the asbestos register is up to date and reviewed

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- Forward meeting minutes and updated action plan to the Estates and Facilities Health & Safety Committee
- Communicate areas of non-access due to asbestos risk to all relevant parties including the Estates Help Desk (areas to be recorded and updated at bi-monthly asbestos meetings)

2.6 Responsibilities within Capital Projects

The project team have responsibilities in relation to the identification of asbestos, provision of information and record keeping.

2.6.1 Assistant Director Estates and Facilities (Capital Projects)

Reporting to:

- Duty Holder

Responsibilities

- All Project Managers (both internal and external) are made aware of the AMP and are committed to disseminating the content through all involved within their projects.
- Ensure funding and resources are available to carry out a refurbishment and demolition survey and any subsequent abatement works if identified, within the project budget.
- A refurbishment and demolition survey is undertaken before the commencement of any construction or refurbishment works.
- Providing all asbestos related information to the responsible person in an agreed and timely manner
- Identified asbestos removal works are completed prior to the principal contractor taking ownership of the work area
- If the above cannot be achieved the responsible person is informed once this decision has been formally made.
- The project team are continually assessed in relation to their basic asbestos awareness and their individual asbestos management abilities.

2.6.2 Estates & Facilities Project Managers

Reporting to:

- Assistant Director of Estates & Facilities (Capital Projects)

Responsibilities

- Engage with the Responsible Person at the earliest opportunity regarding all proposed projects to evaluate existing asbestos related information.
- Complete the Asbestos Notification Form and return to the Responsible Person at the earliest opportunity
- Contractors are aware of, and check, the asbestos register and are made aware of the AMP and the management arrangements identified within.
- Liaise with the Responsible Person on all asbestos related works on projects under their management.

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- Issue all asbestos record information relating to projects under their management to the Responsible Person in a timely manner, at the absolute latest on project completion.
- Provide updated drawings and room numbers to the Responsible Person following all refurbishment works.
- Where FML are not engaged on a project, make an allowance for documentation review and updating the electronic asbestos register
- When a Project Manager commissions works they are the primary point of contact for the works and any subsequent correspondence relating to staff, student or contractor questions or queries
- Ensure all contractors sign and return the EMAP acceptance form
Note – A checklist regarding asbestos information is in Appendix (I)

2.6.3 Campus Maintenance Managers

Reporting to:

Assistant Director of Estates and Facilities (Infrastructure & Maintenance)

Responsibilities:

Any invasive maintenance works likely to either disturb or take place near known asbestos should be managed in a similar manner to project works. In summary this should be;

- Check asbestos register to confirm the presence of asbestos.
- Confirm whether the work activity will disturb the asbestos identified.
- Contact the Responsible Person for further guidance or sampling if required
- Return them, and their supervisors, return the EMAP acceptance form
- Ensure all contractors sign and return the EMAP acceptance form (Appendix F)
- Monitor asbestos awareness of both directly employed maintenance operatives and external contractors
- Ensure asbestos information is readily accessible, checked and understood by all maintenance operatives and contractors
- When a Maintenance Manager commissions works they are the primary point of contact for the works and any subsequent correspondence relating to staff, student or contractor questions or queries

Note – A checklist regarding asbestos information is in Appendix (J)

2.6.4 Responsibilities within Property & Space Management

QMUL have a number of embedded spaces and leased buildings. At times asbestos management may be the responsibility of the landlord or in embedded spaces there will be individual ownership of such spaces. The management of leased buildings and embedded spaces is the responsibility of the Assistant Director Estates and Facilities (Property & Estates Management)

Reporting to;

- Duty Holder

Responsibilities;

- Ensuring all asbestos related information is provided to QMUL by the landlord or Barts Hospital and forwarded to the responsible person for distribution to others
- Obtaining asbestos information following the purchase or lease of any buildings added to the QMUL estate portfolio.
- When entering into lease or rental agreements asbestos management is formally noted within the contract
- When made aware of an asbestos issue ensuring a clear communication process is adhered to.
- Satisfy themselves that all historic asbestos information is filed, updated and can be provided when leasing or selling buildings/floor spaces to external organisations.

2.6.5 The Health & Safety Directorate

The Health and Safety Directorate (HSD) will act as the independent body in overseeing the asbestos management arrangements in place. This will include;

- Undertake, or commission through external consultants, periodic independent audits of the AMP and the management regime in place
- Provide independent and impartial advice and assistance where required
- Review any reported asbestos related incidents and where applicable report such incidents to the HSE as per the requirement of the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013.

2.6.6 Framework Asbestos Consultant

The Framework Asbestos Consultant is responsible for the following:

- Supporting the Responsible Person in achieving compliance with all current legislation, and associated Approved Codes of Practice and Guidance.
- Undertaking Management and Refurbishment or Demolition asbestos surveys, inspections, re-inspections and air monitoring on University buildings as directed by the responsible person.
- Ensuring all information regarding asbestos containing materials for all University properties is passed to the responsible person for inclusion in the University asbestos register.
- Management and monitoring of the asbestos removal process to a level which would not fall within the HSE requirement for a supervisory license.
- Delivering asbestos related training as requested by QMUL
- Maintaining and updating the electronic asbestos register
- Enter a priority assessment score for all acms on the electronic register

2.6.7 IT Services

The Director of IT Services is responsible for ensuring that;

- Suitable systems and processes are designed and implemented to ensure that IT Services are fully compliant with the requirements of this EMAP.
- There are sufficient resources available to ensure full compliance with the EMAP
- All those working on behalf of IT Services, either direct or sub contracted, are made aware of the requirement to seek advice from the responsible person prior to undertaking any intrusive works.
- Ensure all members of IT Services who manage installation or upgrade works have attended asbestos related training

3 General Asbestos Information

3.1 Asbestos Registers and Records

The Asbestos Register identifies the locations of all known or suspected ACM's across the estate. All key members of staff have been issued with individual log ins for the asbestos register.

All asbestos records are held in an electronic format on the Estates and Facilities J Drive.

3.2 Training and Awareness

QMUL will provide Asbestos guidance and awareness training to:

- All QMUL employees who may come into contact with asbestos during the course of their work.
- P405 training for all staff issuing asbestos permits to work
- To external contractors when either the training received is deemed not suitable and sufficient, or where the performance of individuals have raised specific concerns.

3.3 Permit to Work

- A Permit to Work (PTW) is required for all asbestos related works (unless minor works that have been agreed with the responsible person) and should be approved by the QMUL responsible person.
- Authorised person(s) for asbestos works are identified in the PTW procedure.

Note – An asbestos PTW does not supersede a general PTW.

3.4 Reporting of Asbestos Issues

All members of staff and contractors shall report to the responsible person any incidents involving asbestos which will include:

- Any accidental exposure to asbestos fibres (Appendix 1)
- Any material suspected of containing asbestos (Appendix 2)

3.5 Condition Monitoring & Inspection

All instances of known ACMs which have been deemed safe, by way of a risk assessment, that are left in-situ are inspected on an annual basis and records kept.

If the condition of the ACMs has changed then the information will be passed to the responsible person who will undertake a further risk assessment.

3.6 Areas of Restricted Access

Across the QMUL estate there will be a number of locations where acm's have been identified as high risk either due to condition or the likelihood of friability. It is QMUL's objective to remove all such identified acm's however in certain cases it may not be practical to undertake removal immediately. In these instances an access restriction will be put in place. A full list of all areas of restricted access will be formulated following the completion of the annual reinspection programme. As this will be an ever changing "live" document it is the responsibility of the Project Manager's and Campus Maintenance Manager's to contact the QMUL Responsible Person to confirm areas of restricted access and then make contractors working under their control aware.

3.7 Emergency Procedures

In the event of a material being inadvertently damaged which may potentially contain asbestos, the following procedure shall be followed;

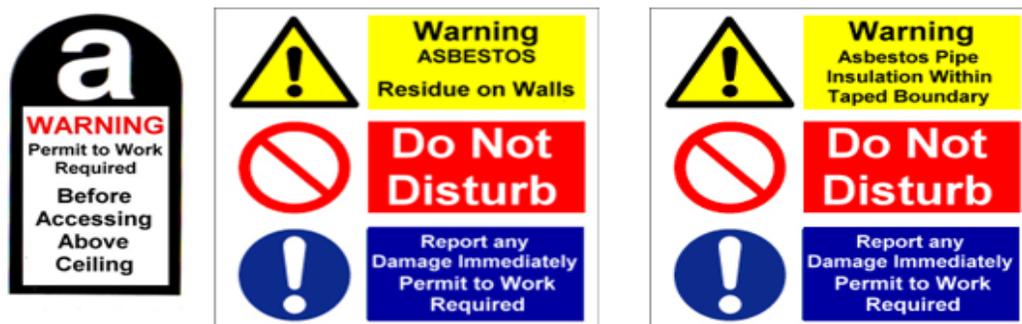
1. Stop work immediately
2. Leave work area
3. Close windows and doors if it is possible to do so without further disturbance to the damaged material or increasing the risk of fibre inhalation.
4. Contact CMM or Supervisor to arrange analytical sampling (if presence of asbestos cannot be visually determined)
5. Prohibit access to the room/area, place warning sign on entrance point
6. If analytical sample returns "No Asbestos" return room to use
7. If analytical sample returns asbestos present then the room is to be left secured until remediation works have been undertaken to make the room safe to enter
8. Further information can be found in the HSE flowchart (Appendix (J))

<http://www.hse.gov.uk/pubns/guidance/em1.pdf>

3.8 Asbestos Labelling

It is the intention of QMUL to label all accessible acms. Labelling will vary from the standard asbestos label to more bespoke labels. Areas of high risk such as debris above ceilings or materials identified as damaged will be prioritised within the labelling regime.

Example of typical labels -



4 Asbestos Removal Procedure

4.1 Design Stage

- Obtain a copy of the current asbestos register
- Use the asbestos survey request template
- Appoint the framework asbestos consultant to undertake a survey and issue them with the current asbestos register.
- Conduct a refurbishment & demolition asbestos survey (please note that surveys require a PTW – all surveys must be discussed with the responsible person)
- Forward all survey information to the Responsible Person
- Establish and include a budget for asbestos removal within the proposed scheme

4.2 Pre-Construction Period

- Appoint a competent licensed removal contractor to remove asbestos containing materials (please note that all asbestos abatement works require a PTW regardless of whether they are being undertaken within a contract with the principal contractor)
- Obtain a Plan of Work (POW) from the competent licenced removal contractor for approval by the responsible person
- Ensure asbestos is removed in accordance with the approved Plan of work (POW)

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- Obtain asbestos clearance certificates from the framework asbestos consultant
- File original asbestos clearance certificates in H & S file
- Send confirmation of asbestos removed to responsible person in order to update the asbestos register

4.3 Construction Period

- Monitor contractors to ensure they are aware of the asbestos survey scope and only undertake works between the areas identified on the survey.
- Inform responsible person of any suspect materials that may not have been sampled during the survey visit
- Arrange for suspect materials to be sampled by the framework asbestos consultant

APPENDICES

A Record of Suspected Exposure to Airborne Asbestos

B Notification of Suspected Asbestos Form

C Management Flow Chart

D Asbestos Survey Request Template

E Contact Details

F EMAP02 Acceptance Form

G Acceptance of Responsibilities

H Confirmation of Access to Electronic Register

I Asbestos Abatement Works Checklist

J HSE Damaged Materials Flow Chart

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APPENDIX (A) – Record of Suspected Exposure to Airborne Asbestos Fibres

Record any potential exposure to asbestos to either contractors or direct employees.

Full details are necessary to maintain accurate records should QMUL receive an asbestos related insurance claim at any point in the future.

A copy of this form should be kept on file by Occupational Health and retained for up to 40 years.

Who has been exposed?

Name _____ Date of Birth _____

Address _____

Employer (If Contractor) _____

Where did the exposure occur?

Building _____

Room/Area _____

Location _____

Details of Exposure?

Date of Exposure _____ Reported to _____

Time of Exposure _____

Time Reported _____

Duration of Exposure _____

How did the exposure occur _____

Provide brief details on the incident _____

Member of Staff/Contractor

(Signature) _____ Date _____

Responsible Person

(Signature) _____ Date _____

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APPENDIX (B) Notification of Suspected Asbestos Form

(Please return to the asbestos responsible person)

Section A

Date: _____

Material found by: _____

Material reported to: _____

Section B Location details of materials

Name of Building _____ Location _____

Specific details of location of material (with photograph if possible) _____

Section C Asbestos Register/Asbestos Survey Ref No: _____

Was the area surveyed or inspected previously but information not recorded?

Checked by (Name) _____

Date _____

Section C to be completed by the person who has checked the asbestos register and verified that the suspected material has not been identified in the asbestos register

Section D Details of actions undertaken

Date _____

Actions undertaken _____

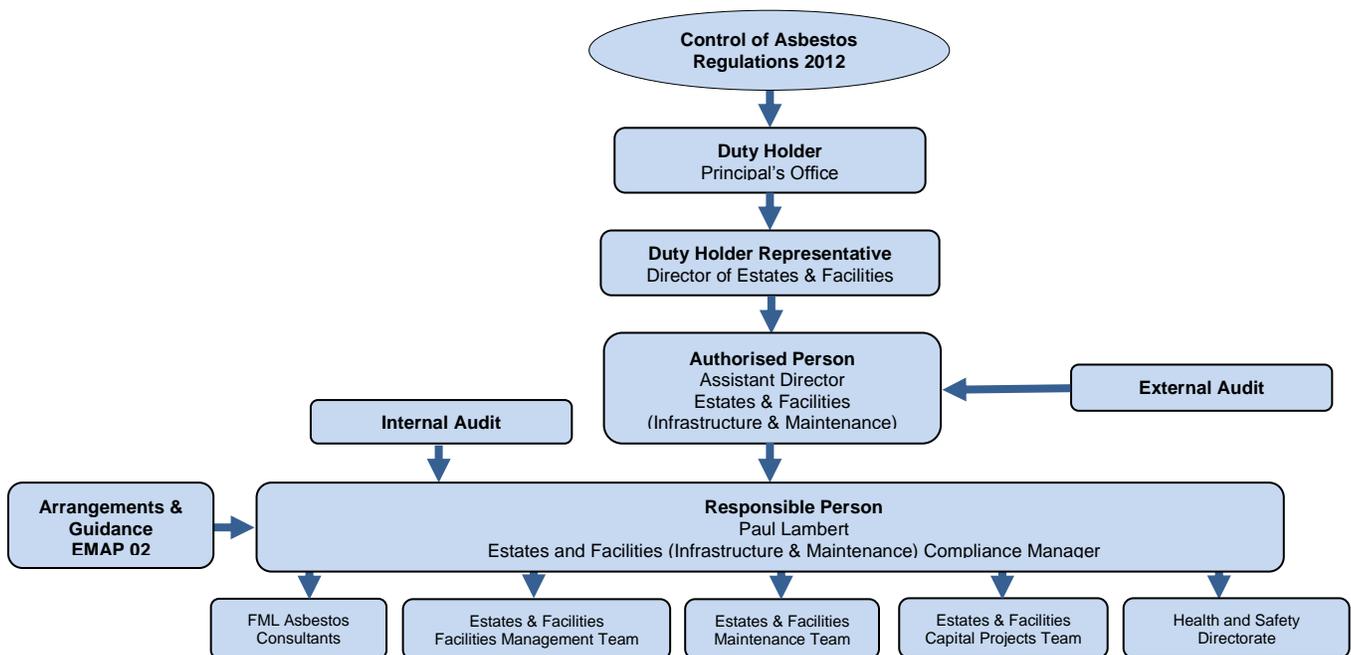
Bulk Sample Certificate No _____

Air Clearance/Reassurance Certificate No _____

APPENDIX (C) Management Flow Chart

ASBESTOS MANAGEMENT & CONTROL

The procedure below identifies roles and responsibilities to achieve compliance with the Control of Asbestos Regulations 2012.



APPENDIX (D) Project Asbestos Notification Form

Project Asbestos Notification Form

1. Project or Maintenance Manager Details			
Contact	Name;	Tel:	
Details	Position:	E-mail:	
2. Details of property to be surveyed			
<i>If multiple buildings please attach separate sheet</i>			
Building Name	Project Ref No	Specific Areas	Site contact details
		<i>Include riser cupboards, corridors etc when services are to be taken outside of the project boundaries</i>	
3. Detailed scope of project			
<i>Details to cover any demolition works, access above ceilings, under floors, into service risers and penetrations through structures. Consideration should also be given to routes for new services and removal of existing services</i>			

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3(a) Principal Contractor Details (if already appointed)	
Name:	
Telephone:	
E-mail:	
3 (b) Principal Designer Details (if already appointed)	
Name:	
Telephone:	
E-mail:	
4 Proposed Site Visit & Report Dates	
Access available on:	
Report to be delivered by:	
5 Pre Survey Information	
Has an asbestos management survey been undertaken previously?	Yes/No
Have any refurbishment and demolition surveys been undertaken previously?	Yes/No
Please provide dates when survey visit is to commence	
Please provide dates when survey report is to be issued	
Please provide details on any rooms or areas that are not to be accessed during the survey visit	
Will all areas where a survey is required be empty of building occupants at the time of the survey visit?	Yes/No
Identify acceptable caveats within survey report	
Identify acceptable level of damage during survey visit	
Is it the intention to undertake all abatement works prior to principal contractor taking ownership of the site?	Yes/No

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6 Survey Completion Comments

6 (a) Estates & Facilities Responsible Person

6 (b) Estates & Facilities Project or Maintenance Manager

6 (c) FML Lead Surveyor or Contract Manager

APPENDIX (E) Contact Details

QMUL Duty Holders Representative – Mike Sheppard

Interim Director of Estates & Facilities

Email: m.sheppard@qmul.ac.uk

Tel: 020 7882 8901

QMUL Authorised Person – Mark Vinter

Assistant Director of Estates & Facilities (Infrastructure and Maintenance)

Email: m.vinter@qmul.ac.uk

Tel: 020 7882 8383

Mobile: 07717 156 012

QMUL Responsible Person – Paul Lambert

Compliance Manager Estates & Facilities (Infrastructure and Maintenance)

Email: p.lambert@qmul.ac.uk

Tel: 020 7882 3327

Mobile: 07775 864 256

Asbestos Consultants – Fibre Management Limited (FML)

Office Email: enquiries@fibremanagement.co.uk

Office No: 01342 313 848

Assistant Director Estates and Facilities (Capital Projects) – Roger Tuke

Office Email - r.tuke@qmul.ac.uk

Tel: 020 7882 8385

Assistant Director of Estates and Facilities (Capital Projects) – Graham Schofield

Office Email - g.schofield@qmul.ac.uk

Tel: 020 7882 8382

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APPENDIX (F) EMAP 02 ACCEPTANCE FORM

QUEEN MARY, UNIVERSITY of LONDON

Acceptance of Asbestos Management Plan (EMAP-02)

I have received a copy of QMUL's Asbestos Management Plan and will comply with all requirements within.

This document will be forwarded to colleagues within the company/department as appropriate.

I will take all necessary precautions to ensure no one is exposed to asbestos, either deliberately or inadvertently, while undertaking work on QMUL property.

Signed _____

Name (Print) _____

Company/Department _____

Date _____

Comments-

APPENDIX (G) – ACCEPTANCE OF RESPONSIBILITY



Memorandum

To: Paul Lambert – Compliance Manager, Estates and Facilities (Infrastructure & Maintenance)

From: Mark Vinter - Assistant Director of Estates and Facilities (Infrastructure & Maintenance)

Date: 30th March 2016

Subject: Responsible Person - Asbestos

Paul Lambert – Compliance Manager, Estates and Facilities (Infrastructure & Maintenance)

You are nominated as the Responsible Person – Asbestos.

Duties attributed to your role are listed within the enclosed QMUL EMAP 02 document, and any subsequent revision.

This appointment is for 2 years from the date of this memorandum.

Please return a signed copy of this memorandum to me indicating your acceptance of this appointment. If there are any aspects of the role which you feel require further discussion before signing, kindly bring these to my attention at this time.

Mark Vinter
Assistant Director of Estates and Facilities (Infrastructure & Maintenance)

I accept the appointment detailed above and acknowledge receipt of the QMUL Asbestos Management EMAP 02.

Name..... Title.....
Date.....

Signature.....

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APPENDIX (H) – ACCESS TO ELECTRONIC REGISTER CONFIRMATION

Electronic Asbestos Register – Acknowledgement of Receipt Document



Queen Mary University of London (QMUL) has an electronic asbestos register that gives details of location, material type and condition of all asbestos containing materials across the estate.

This register is updated following any remediation, survey or reinspection visit and is a live data base.

By acknowledgment of this form I confirm that I have received log in details to the QMUL electronic asbestos register.

Signed _____

Name (Print) _____

Campus _____

Date _____

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APPENDIX (I) – ASBESTOS ABATEMENT WORKS CHECKLIST

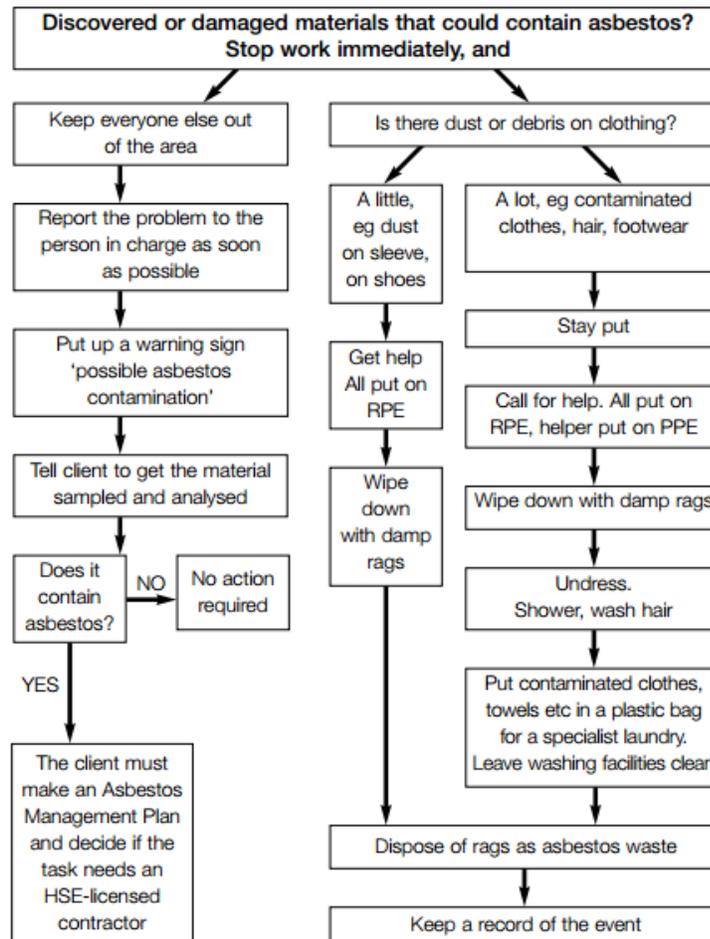
ASBESTOS ABATEMENT WORKS CHECKLIST				
1	Has a defined scope and specification of works been agreed and communicated to all stakeholders?	YES	NO	EVIDENCE
2	Has the licensed asbestos removal contractor provided a copy of their asbestos license?			
3	Has the contractor provided a method statement?			
4	Has the contractor provided suitable and sufficient risk assessments?			
5	If applicable, has a copy of the ASB5 notification been forwarded?			
6	If applicable, has a notifiable non-licensed notification (ASBNNLW1) been provided?			
7	Has a completion certificate been provided?			
8	Have all analytical certificates been provided?			
9	Has all remaining asbestos been detailed and labelled?			
10	Has all documentation been forwarded to FML to enable them to update the electronic asbestos register?			
11	Have all waste consignment notes been provided			

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APPENDIX (J) What to do if you uncover or damage materials that may contain asbestos (EM1 Asbestos Essentials)

MORE HELP

- More asbestos pictures - www.hse.gov.uk/asbestos/gallery.htm
- Help to decide if work is licensed - www.hse.gov.uk/asbestos/licensing/index.htm
- For information about health and safety, or to report inconsistencies or inaccuracies in this guidance, visit www.hse.gov.uk/. You can view HSE guidance online or order priced publications from the website. HSE priced publications are also available from bookshops.
- These equipment and method (em) sheets and task (a) sheets can be downloaded free from www.hse.gov.uk/asbestos/essentials/index.htm
- See sheet a0 for details of more guidance.



Procedures

- Stop this work immediately.
- Follow the chart above or do a risk assessment to decide who must do the work - you may need a licensed contractor.
- Minimise the spread of contamination to other areas.
- Keep exposures as low as you can.
- Clean up the contamination.