



Health & Safety Asbestos Management Policy

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¹ or earlier if change in legislation or on risk assessment

Amendment Control

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1.0	Oct 2023	

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Policy Summary

The policy of Edinburgh Napier University is to provide and maintain safe and healthy working conditions, equipment and systems of work for all staff, students and others, and to provide such resources, information, training and supervision as needed for this purpose.

The University will provide resource and maintain appropriate management systems, systems of work and equipment to ensure that asbestos fibre release risks to all staff, students and others are controlled. Suitable information, instruction, training and supervision will be provided to all those involved in work which could potentially disturb asbestos containing material.

The University will adopt the principles of control as set out in the Control of Asbestos Regulations. Other publications, including those detailed in Section 7, will also be used to source best practice guidance where appropriate.

The management of asbestos risk will be a continual commitment by the University and will involve regular monitoring and progress meetings, a risk assessment programme, monitoring, inspection and record keeping.

The University will do all that is reasonably practicable to comply with its requirements, and will make the necessary resource available.

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1 Executive Summary

For many years, products containing asbestos have been extensively used for a range of applications in a variety of locations. Whilst the use of asbestos has been banned in the UK, asbestos products are still present in a number of locations within the University estate.

This Policy has been drawn up in accordance with the latest Regulations, specifically Regulation 4 of the Control of Asbestos Regulations, Approved Codes of Practice and Guidance on asbestos from the Health and Safety Executive and will be reviewed and updated in the light of any future changes to these Regulations, Approved Codes of Practice or Guidance.

The University will endeavour to comply with all approved Codes of Practice and Guidance issued by the Health and Safety Executive in respect of the exposure of its employees and others to asbestos arising from the activities or undertakings of the University. The University will do everything reasonably practicable to protect all such persons from risks to health from exposure to asbestos.

Since it is Edinburgh Napier University's policy to comply fully with such duties, Property & Facilities must ensure that the requirements of the Regulations are discharged, and that the policy on asbestos is incorporated into its local safety statements. Individual staff who organise, arrange or lead such work must acquaint themselves with, and act upon, the requirements of this policy. The effectiveness of these arrangements will be monitored periodically by the Director of Property & Facilities.

2 Hazards and Legislation

This document sets out the University policy, management plan and procedures for managing asbestos.

The presence of asbestos containing materials (ACM's) does not in itself constitute a danger. However, it is hazardous when disturbed or damaged and must be treated accordingly. Activities which give rise to airborne dust, e.g. abrasion, breaking, sawing, cutting, drilling or machining ACM's, are most likely to present risks.

Staff and contractors are not expected to work with or be exposed to asbestos on University sites.

A limited number of staff whose normal duties may bring them into contact with existing asbestos containing materials (e.g. electrical, mechanical, building maintenance and IT staff) will be trained in asbestos awareness.

The Control of Asbestos Regulations (CAR) requires employers to prevent the exposure of their employees to asbestos. Where this is not practicable, exposure must be reduced to the lowest practicable. CAR also places a duty on those who have repair and maintenance responsibilities for premises to manage the risk from asbestos in those premises. Where there is no contract or tenancy, the person in control of the premises will be the dutyholder. There is also a duty of co-operation between dutyholders.

Regulation 4 of CAR places legal duties on employers/occupiers/ landlords etc. in respect of managing asbestos in non-domestic premises. The broad requirements are to:

- Take reasonable steps to find materials containing, or likely to contain, asbestos (ACM's).
- Presume materials contain asbestos unless strong evidence to suppose that they do not.
- Assess the risk of the likelihood of anyone being exposed to asbestos from these materials.
- Make a written record of the location and the condition of the ACM's and keep the record up to date.
- Carry out remedial action based on the assessment of risk of exposure, including factors such as location, condition, likelihood of disturbance, etc.
- Prepare an action plan to manage the risk and implement it.
- Provide the necessary information, instruction and training for all staff, contractors and anyone else who needs it.
- Monitor the ACM's and maintain them.
- Review and monitor the action plan and associated procedures and systems.

Under Regulation 11 of CAR, every employer shall prevent or reduce the exposure of their employees to asbestos. Where it is not reasonably practicable to prevent such exposure, exposure must be reduced to the lowest level reasonably practicable by measures other than the use of respiratory equipment.

Under Regulation 12 procedures should be in place to make sure that the control measures are properly used.

Where is asbestos likely to be found

Asbestos containing materials include:

- sprayed "limpet" coating - on structural steelwork for fire protection
- thermal lagging - on pipes, boilers, heating system insulation
- wall/partition board - general building material
- ropes and yarns - skylights, boiler, seats
- cloth products - gloves, blankets woven
- flooring materials - linoleum and thermo-plastic tiles
- textured coatings - decorative finishes (such as Artex)
- mastics, putties, sealants
- bitumen, roofing felts
- resin and composite materials
- gaskets - fires, heating/ventilation systems
- cement - roofing, rainwater goods, brake, linings

The above list represents the main groups of materials manufactured with asbestos and other asbestos products exist. It is estimated that asbestos was used in around 3000 products.

3 Statement of Policy

The University recognises its role under Regulation 4 of the Control of Asbestos Regulations and will implement an effective asbestos containing materials management plan so that appropriate measures, such as monitoring, encapsulation, sealing, labelling, inspection or removal of the material, are undertaken by:

- a) Taking all reasonable steps to locate materials in premises likely to contain asbestos and to check their condition.
- b) Presuming that likely materials may contain asbestos unless there is strong evidence to suppose they do not.
- c) Making a written/electronic record of the location and condition of asbestos and presumed asbestos containing material (ACMs) and keep the record up to date.
- d) Assessing the risk of the likelihood of anyone being exposed to these materials.
- e) Preparing a plan to manage that risk and put it into effect to ensure that:
 - any material known or presumed to contain asbestos is kept in a good state of repair.
 - any material that contains or is presumed to contain asbestos, because of the risks associated with its location or condition, is removed.
 - information on the location and condition of the material is given to anyone potentially at risk.
- f) The responsibility of this management plan should be assigned to a Nominated Person(s).

4 Roles and Responsibilities

The primary responsibility for implementing this policy rests with Property & Facilities and the University's Health & Safety Team, or any other relevant source.

4.1 Director of Property & Facilities

The Director of Property & Facilities is responsible for:

- Executing the principle functions of asbestos management by assembling and maintaining a suitably qualified asbestos team consisting of staff and consultants/contractors.
- Chairing departmental meetings quarterly and disseminating policy and procedures.
- Attending the University Health and Safety Committee meetings twice per annum and presenting issues for consultation/acceptance by this committee for the formation and development of University asbestos related policies.
- Attending the Property & Facilities Management Team meetings and through this disseminating to other senior officers, outside of their direct control, policy and procedures developed in the above groups and committees.
- Reviewing with the Property & Facilities department strategic activities.

- The application for available resources provided by the University and subsequent allocation of these toward the optimum management of asbestos issues.
- Receiving advice from the Property & Facilities department on the inclusion / suspension / removal of asbestos related consultants / contractors and acting upon such advice.
- Discharging to Property & Facilities for operational requirements within the agreed policy and financial framework.
- Ensuring that staff under their direct control have sufficient and suitable initial and update training with respect to asbestos issues where appropriate.

4.2 Nominated person controlling asbestos on behalf of Property & Facilities

The nominated person is responsible for:

- Completing and submitting the Asbestos Notification Form.
- Attending the Departmental Management Team meetings bi-monthly and implementing asbestos policy from this operational level.
- Reviewing on a frequency less than monthly with the staff under their control asbestos issues relating to maintenance/upgrade projects carried out by the section.
- Reviewing progress of asbestos issues relevant to all projects on a bi-monthly basis.
- Ensuring that the staff under their control include within the financial and operational plan for maintenance/upgrade operations sufficient resources to deal with asbestos related issues.
- Ensuring that the staff under their control advise staff and contractors under their control of the presence or otherwise of asbestos containing materials affecting the proposed operations and implementation of the subsequent recommendations.
- Supporting applications to the Director of Property & Facilities for available resources provided by the University's central bodies.
- Ensuring that staff under their direct control have suitable and sufficient initial and update training with respect to asbestos issues where appropriate.
- The operational compliance of the University with the relevant regulations.
- Reviewing all asbestos issues relating to maintenance activities or upgrade projects carried out by the maintenance section.
- Provision of the asbestos register at all campuses, this may be done by reference to available published information in paper or electronic format.
- Ensuring that they advise staff and contractors under their control of the presence or otherwise of asbestos containing materials affecting the proposed operations by their requirement of staff and contractors referencing the asbestos register before commencing any work.

4.3 Project Managers

Project Managers are responsible for following the University Asbestos Management procedures by:

- Ensuring that external project management consultants involved in their projects follow the University procedures and that all appropriate information is disseminated.
- Ensuring the completion of the Minor Works Authorisation Form before undertaking any minor work which affects the building fabric or engineering services.

- Assessing areas prior to project start to identify any known risk from asbestos by consulting the asbestos register for the property where available and ensuring a renovation/demolition survey is carried out.
- Completing and submitting the Asbestos Notification Form implementing the recommendations of the Asbestos Consultant.
- Informing staff and contractors of the location of any known asbestos affecting the project.
- Halting work and informing staff if suspect asbestos material is discovered during the course of work and seeking advice from the Asbestos Consultant.

4.4 Nominated Person(s) Asbestos

The Nominated Person(s) Asbestos is responsible for:

Managing asbestos containing materials by:

- Implementation and maintenance, including updating, of a suitable asbestos register in a hard copy format or a computerised management database accessible through the University intranet.
- Appropriate dissemination of the information contained within the asbestos register.
- Carrying out re-inspection of all identified ACM's at intervals determined by risk assessment.
- Instructing, directing and liaising with external consultants in the form of surveyors, accredited analysts, and specialist licensed asbestos removal contractors.
- Liaising with and advising School/Service representatives, including School/Service safety advisors.
- Assisting in the implementation of the Asbestos Management Plan and ensuring its progress, including monitoring, prioritisation, encapsulation, removal and re-inspection at intervals determined by risk assessment.
- Assessing, reviewing and recommending management actions in light of re-inspection findings and changes in regulations or current good practice.
- Working with the asbestos competent persons, to include investigation, monitoring and sampling.
- Carrying out appropriate levels of investigation in response to an Asbestos Notification Form and providing a documented response including, but not exclusively, site inspection, sampling and reporting on receipt of analytical results.
- Assessment and completion of the Minor Works Authorisation Form, in response to request for departmental minor works.

Managing remedial works by:

- Managing the Permit-to-Work system and assisting in overseeing asbestos works contracts.
- Selecting an Asbestos Consultant/Analyst, briefing and liaising between the Consultant and Property & Facilities staff.
- Selecting asbestos removal contractors from the approved contractors list.
- Contractor induction undertaken and sign code of practice held by university.
- Assessing contractors' risk assessments and method statements with the consultant and recommending selection based upon value for money.
- Assessing the appropriate level of analytical support and attendance.

- Informing appropriate staff and liaising with Trade Union / School/Service Safety Coordinator in respect of asbestos related works.
- Monitoring performance of Approved Contractors to assess their compliance with statutory requirements and competence to carry out asbestos remedial works in university premises, reporting and discussing deficiencies with the nominated person and making recommendations to the Director of Property & Facilities.
- Monitoring performance of consultants to assess their compliance with statutory requirements and competence to carry out asbestos management works in university premises, reporting deficiencies and making recommendations to the Director of Property & Facilities.
- Reviewing and implementing reports and audits by the Asbestos Consultants.

Informing, liaising and educating by:

- Advising on technical procedures and policy documentation.
- Participating in the organisation and implementation of asbestos awareness seminars and talks for maintenance staff.
- Regular dialogue with the Health & Safety Team.

Record keeping by:

- Ensuring the Asbestos Register is updated and maintained.
- Ensuring the updating of CAD asbestos drawings.
- Ensuring that all statutory documents generated by the asbestos works are properly completed and records kept.
- Maintaining detailed project records relating to asbestos remedial or investigative works under the appropriate building code.
- Assisting the nominated person in maintaining financial records to ensure budgetary control is achieved and advising on future financial requirements.

4.5 Asbestos Competent Person

The Asbestos Competent Person is responsible for:

- Providing support to the Nominated Person Asbestos.
- Implementation of the restricted access procedure for appropriate areas.
- Supporting the evacuation and closure of areas in university premises in the event of an uncontrolled escape of asbestos fibres.
- Assisting in providing building specific information on key contacts, site orientation, construction types and previous asbestos management activities where required.
- Maintaining a record of work requests and providing progress and completion reports to the Nominated Person Asbestos on an as-required basis.

In order to assist the University to manage its asbestos a specialist organisation will be employed to provide strategic advice on:

- Managing asbestos materials.
- Developing a suitable Asbestos Policy and its associated Codes of Practice.
- Compiling an asbestos register.
- Management of asbestos removal contractors.
- Undertaking all types of air monitoring.
- Assessment of exposure.

- Re-inspection and re-assessment of the condition of asbestos on a regular basis.
- Auditing asbestos management.

The Asbestos Adviser will also provide assistance when dealing with the public, press, unions and staff following an incident involving asbestos.

4.6 Asbestos Removal Contractors

Asbestos Removal Contractors are responsible for:

- Complying with current legislation and associated Approved Codes of Practice and guidance.
- Attending site to assess and prepare quotations against asbestos remedial works specifications, the Contractor to raise any issues relating to the health and safety or potential later costs of a project.
- Providing a risk assessment and method statement for the works to the Nominated Person Asbestos and the Statutory Authority.
- Methods of work for emergencies must be discussed and agreed with the Nominated Person Asbestos or Asbestos Competent Person, or in their absence with the Analyst. The method statement to indicate the resources and timetable allocated to the project.
- Attending the relevant Pre-Start Meeting, Progress Meetings and Handover Meeting as required.
- Providing Statutory Notice to the Notifying Authority prior to commencing asbestos works, or, by agreement and at the request of the Nominated Person Asbestos, applying for a waiver against the minimum notice period.
- Carrying out their obligations under their works contract, including maintaining high standards of safety and hygiene in asbestos work areas and supplying labour, materials and equipment of a high standard with all necessary supporting documentation.
- Arranging transport and disposal of asbestos waste materials in accordance with current regulations and good practice.
- Carrying out regular inspections of the work environment, any defects found or reported by the Nominated Person Asbestos or Consultant, Analyst, Health & Safety Team to be rectified immediately.
- Complying with all reasonable requests from the Nominated Person Asbestos and with site wide or asbestos specific Permits-to-Work.
- Liaising with the Consultant/Analyst to ensure the satisfactory progress of the works.
- Identifying to the Nominated Person Asbestos, or if not immediately available the Consultant/Analyst, any additional elements of work, these to be agreed and the method statement updated accordingly.
- Providing copies of notification and consignment notes and other relevant documentation as soon as available to the Nominated Person Asbestos or Consultant.

4.7 Asbestos Consultants

Asbestos Consultants are responsible for:

- Providing support to the appropriate University staff.
- Reviewing and commenting on Asbestos Works Specifications and, prior to commencement of the works, on the Contractor's Method Statement.

- Providing quotations which reflect the anticipated project site and analytical requirements.
- When requested, attending meetings as required.
- Completing check lists as drawn up by the Nominated Person Asbestos.
- Assisting with the application and completion of University specified permits relevant to the asbestos remedial project.
- Carrying out analytical works and inspections as agreed with the appropriate University staff, analysis to be carried out by a UKAS accredited laboratory.
- Where site conditions alter, the Asbestos Consultant to amend the level of testing and inspection to ensure that all information relevant to the continued health and safety of the contractor and building occupants is obtained.
- Reporting any defects or non-compliances relating to the contractor's performance, including suitability of the work areas, adherence to the method statement, Statutory Instruments, and should the Nominated Person Asbestos and Property & Facilities contact not be immediately available the Analyst to take any measures necessary to ensure the health and safety of the contractor and building occupants.
- Checking areas on completion of asbestos remedial works to ensure that the Contractor has completed his scope of works and all affected areas have been left in a satisfactory condition.
- Maintaining regular, at least weekly, contact with the Nominated Person Asbestos and Property & Facilities contact regarding progress of site works.
- Reporting to the Nominated Person Asbestos, and others if appropriate, any aspects of asbestos management encountered on site that could give rise to health risks, for example, breaches of Asbestos Management Procedures, suspect or damaged asbestos materials.
- Providing weekly written reports on project progress - the reports to include such information in excess of accreditation requirements as requested by the Nominated Person Asbestos issuing Completion Reports, including clearance documentation, to the Nominated Person Asbestos and Property & Facilities contact on completion of site works with a minimum of analysis confirmation, instruction to contractor, method statement, clearance and consignment certificates and asbestos containing materials that remain within the designated areas of asbestos removal works.
- Stopping the work where the Asbestos Contractor does not perform to the required standards.
- Providing cost estimates for asbestos works including surveys, sampling, removal and supervision.
- Providing all necessary documentation including the Works Completion statement.

4.8 Asbestos Analysts

Asbestos Analysts are responsible for:

- Carrying out works as above under the instruction from the Asbestos Consultant.
- Undertaking air monitoring and clearance testing as and when required under instruction from the Asbestos Consultant / Nominated Person and Property & Facilities contact relevant to the work in progress.
- Maintaining UKAS accreditation in respect of:
 - surveying buildings to determine presence of asbestos
 - fibre counting

- air monitoring
- clearance testing

4.9 Deans of School/Directors of Service

Responsibilities are also imposed on all other Schools/Services with regard to:

- Monitoring and reporting fabric damage to University buildings.
- Purchasing asbestos-free items for use in teaching and research.
- Ensuring that no work takes place on asbestos materials.
- Ensuring that any works on asbestos is passed to Property & Facilities.
- Property & Facilities will engage external contractors that are competent and fully aware of, and complying with, the Control of Asbestos Regulations in the normal pursuit of their activities.

Ensuring that:

- All staff, students and visitors are aware of their individual responsibilities regarding this Asbestos Policy and Procedures.
- Departmental staff undertaking or supervising works within the school/service are aware of their responsibilities as Contract Administrators and comply with the requirements of the University Asbestos Policy and Procedures.
- Property & Facilities or Nominated Person Asbestos is immediately alerted when asbestos is found or suspected so that assessments can be made and appropriate action taken.
- That the school/service implements any measures deemed necessary by the Nominated Person Asbestos or Asbestos Competent Person.
- That all known asbestos containing material in departmental equipment and apparatus is clearly identified, appropriately recorded and managed.
- That departmental staff, student or visitors are not at risk of exposure to hazardous asbestos containing materials.
- Ensuring staff complete the authorisation form before undertaking any minor work which affects the building fabric or engineering services.
- Any activities likely to affect asbestos materials are only carried out after consultation with, and in agreement with, the Nominated Person Asbestos.
- New equipment or apparatus erected, installed, purchased or gifted on behalf of the department is free of asbestos material.

4.10 Staff and Students

Staff and students are responsible for:

- Ensuring that any activity that may disturb or damage asbestos containing materials is avoided.
- Contacting the Nominated Person Asbestos and ensuring the University Asbestos Management Procedures are abided by when activities are undertaken that may disturb asbestos containing materials.
- Reporting to their Dean/Director, Senior Administrator, School/Service Safety Coordinator, supervisor or manager any material suspected to contain asbestos where the material has been disturbed or damaged, or where staff are likely to undertake activities which may affect such material.

4.11 Contractors

Contractors are responsible for:

- Ensuring that all employees and staff under their control abide by the rules and conditions set out in the University Control of Contractors Code of Practice at all times.
- Ensuring that all of their employees and staff under their control working on Edinburgh Napier University sites reference the relevant section of the Asbestos Register and sign to acknowledge they have understood its contents. This must be done before any surveying or work commences.

4.12 Occupational Health Provider (via Human Resources)

If anyone has been involved in an asbestos incident at the University, they will be asked to complete a [Contact With Asbestos form](#) so that a record of that exposure can be kept. Individual concerns will be discussed with the University's Occupational Health provider. Staff will also be entitled to information about the nature of the incident and what has been done, or is going to be done, to prevent a recurrence.

Individuals may wish to consult their GP so that a note can be made on their personal medical record of the possible exposure including date(s), duration, type of fibre and likely exposure levels (if known). GPs no longer routinely carry out x-ray examinations in relation to asbestos exposure because they can only be used to diagnose disease once it has become established (usually 10-40 years after the exposure). An x-ray will not show any fibres present in the lungs after an exposure to asbestos.

4.13 Health & Safety Team

The Health & Safety Team is responsible for:

- Reporting incidents under RIDDOR.
- Undertaking, when requested, an auditing role on representative projects carried out by the Nominated Person Asbestos, Asbestos Contractor or Analyst.
- Providing advice on Asbestos Awareness Training for staff as necessary.
- Attending the University Health and Safety Committee meetings three times per annum and discussing issues for consultation/acceptance by this.
- Committee for the formation and development of university asbestos related policies.

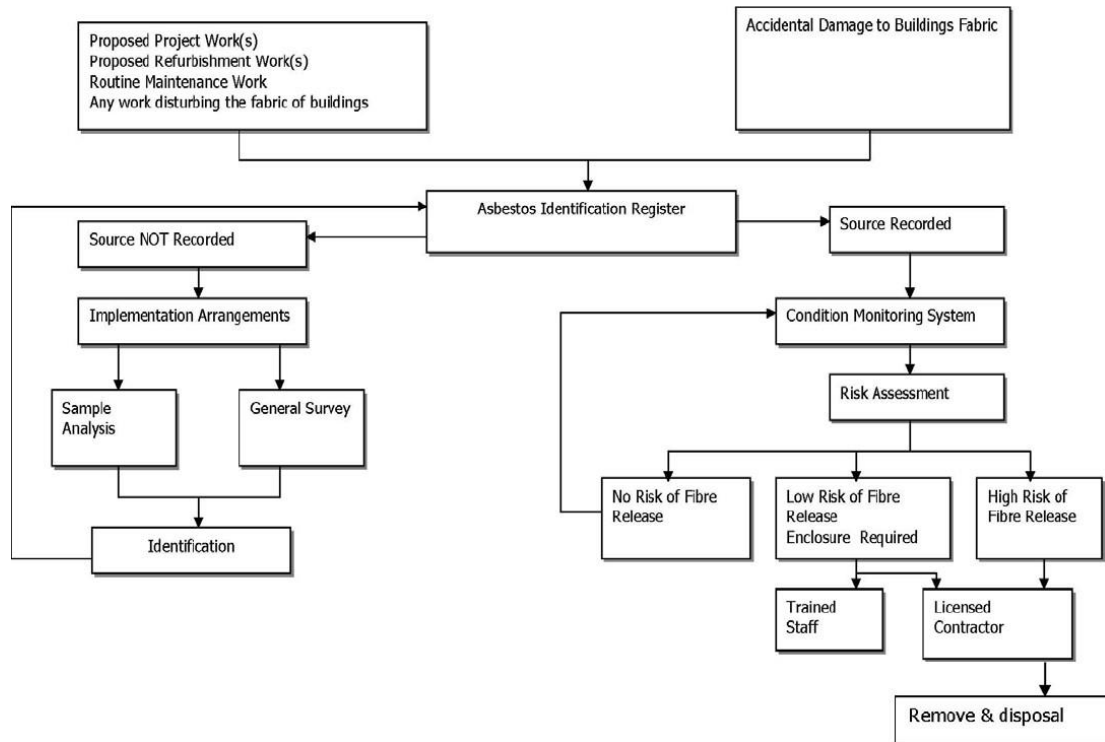
5 Control Methodology

5.1 University Code of Practice/Arrangements

Current guidance advises that immediate removal of all asbestos containing material is not necessarily the best option. Where asbestos is in good condition, not likely to release fibres into the air and not in a position where it is likely to be damaged by normal building use, it is best sealed or covered and its presence noted by labelling and/or entry on a register. The University intends to follow this guidance. Asbestos will be dealt with on a priority basis, based upon the risk which it is considered is

created by the material. This shall take into account the potential for fibre release, taking into consideration conditions of the material, its location and the likelihood of the material being damaged. Figure 1 outlines the arrangements the University will put in place for dealing with asbestos.

Figure 1: Schematic Diagram for Prioritising and Dealing with Asbestos



5.2 University Management Plan

5.2.1 Asbestos replacement

In general, asbestos materials which are not considered to be creating a risk will not be removed and a management system introduced to monitor its condition. The management of this is carried out by Property & Facilities (Appendix 1) who employ consultants to manage and assess the asbestos left in place.

Asbestos materials will be sealed in accordance with the approach shown. Whenever they receive minor damage they will be resealed and removal considered should the damage be substantial.

Where possible, progressive substitution of asbestos materials will take place on a priority basis in areas where they are likely to be regularly worked on, disturbed or receive damage.

5.2.2 Asbestos register

In order to manage asbestos in buildings, it is first necessary to determine its presence (known or presumed). Any information gathered from this survey should be entered into an asbestos register.

The size of the building and the amount of asbestos present will determine the format of the asbestos register.

The information to be held in the asbestos register will include:

- The building and the location within the building
- The type of asbestos present
- The type of material(s) containing asbestos (in some instances it may be useful to record non-asbestos materials)
- The extent and condition of the asbestos materials and any actions required

Other additional information, including accessibility, proposed refurbishment etc. may also be included in an asbestos register.

Many new building materials use MMMF and other non-asbestos fibres. Consideration will be given to including non-asbestos fibrous materials in the register such that the register becomes a 'Materials Register'. This is particularly important where non-asbestos materials are similar to asbestos materials and confirmation of composition of the material is required.

The asbestos register will be presented in different formats including paper records and associated drawings and held in CAD plans. Whatever the form of the asbestos register, it will be accessible to those who need to use it, it is user-friendly and it is kept up to date.

Asbestos materials will be inspected at regular intervals, three, six or twelve monthly. The exact timetable for inspection depends largely on the likelihood of damage or deterioration. A record of these inspections will be maintained. Where short inspection periods are advised i.e. less than 6 months, serious consideration will be given to removal of, or appropriate remedial action in respect of, the asbestos.

The inspections will be carried out by a specialist company, competent to carry out such inspections. That person(s) will have attended a suitable training course covering topics such as asbestos materials in buildings, assessment of condition and management of asbestos.

The asbestos register will be accessible to all who require to use it. One copy will be held on each campus and another held by Property & Facilities in a central location. All copies will be kept up to date.

Prior to the issue of any Permit-to-Work, the asbestos register will be consulted by the person requesting the Permit-to-Work as a further precaution to ensure that asbestos materials are or are not present in the areas in which they will be working.

It will be possible to give additional details regarding the asbestos register on the Works Order Cards, as well as information on the precautions to be taken and the actions to be taken if asbestos is damaged.

5.2.3 Surveying for asbestos materials

For the surveyors, the document HSG264 sets out how to survey the premises to determine the presence of asbestos and the methodology to be used together with information including:

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- Sampling materials
- Assessing materials
- Reporting and presenting the survey results
- Surveyor and client/dutyholder expectations

For the Clients/Dutyholders, the document gives information regarding:

- Deciding what type of survey is required
- Selecting a competent surveyor
- Client/dutyholder and surveyor expectations
- Restricted access, exclusions and caveats which affect the overall effectiveness of the survey
- Checking the report for validity and accuracy

The type of survey to be undertaken will depend on the aim and purpose to which the results will be put i.e. demolition, refurbishment, new cable installation, formation of an asbestos (or materials) register, etc.

In some instances a materials register is more appropriate where there are non-asbestos and asbestos materials present on the same site. Some new, non-asbestos materials appear very similar to asbestos materials especially in areas of poor visibility such as plant rooms, service ducts or risers.

HSG264 describes the two types of survey.

5.2.4 Management survey (formerly type 2) – standard survey

The purpose of this type of survey is to locate, as far as is reasonably practicable, the presence and extent of any suspect asbestos materials in a building which could be damaged or disturbed during normal occupancy, including foreseeable maintenance and installation. During this survey, an assessment is made regarding the condition of the asbestos material.

During a Management Survey, samples of materials known or suspected of containing asbestos may be collected for analysis to determine their asbestos content.

Where samples are not collected during a survey, a record may be made “that the material is presumed to contain asbestos”. This would apply to materials to which there was no access, i.e. at high level, during the survey.

This type of ‘default’ presumption may be more expensive in the long run as non-asbestos materials are ‘managed’ as asbestos materials and each time work is to be carried out, the presence of asbestos needs to be determined. It may also lead to non-asbestos materials being removed and disposed of as asbestos, incurring the higher rate of landfill charge(s).

In some instances, the Client/Dutyholder may wish to ‘presume’ the presence of asbestos rather than using the information from sampling and analysis of suspect materials. It is advised that this type of presumption is suitable for small and/or simple type(s) of premises or for premises constructed after 2000 where asbestos should not be present.

This presumption should not be used for buildings which have undergone major refurbishment during which asbestos has been removed unless there is very strong evidence that ALL asbestos has been removed.

5.2.5 Refurbishment and demolition surveys (formerly type 3)

The purpose of these types of surveys is to locate and describe all asbestos materials in an area or building before the refurbishment or demolition takes place. It may also be required when there is intrusive maintenance and/or repair work such as:

- Plant/equipment removal or dismantling
- Cable installations

The survey will involve destructive inspection, as necessary, to gain access to all areas including those that may be difficult to reach. A full sampling programme is undertaken to identify possible asbestos materials.

The surveyors are expected to use aggressive inspection techniques such as:

- Lift carpets and tiles
- Break through walls, ceilings, cladding, partitions
- Open up floors
- Access ceiling voids, risers, ducts
- Find concealed or hidden areas

The area within which the survey is carried out should be unoccupied to minimise the risks to employees, public, etc. Ideally the area should NOT be in service and all furnishings removed. Under no circumstances should staff remain in rooms or areas of buildings when intrusive sampling is performed.

For minor refurbishment, this would only apply to the room, area, or part thereof. In this situation, it may be necessary to isolate the survey area from the rest of the room or area by the erection of a polythene screening (floor to ceiling). Any furnishings, fittings, etc. should be removed from the survey area. Those that remain will need to be protected by polythene sheeting.

It will be necessary to demonstrate that the survey area is fit for normal re-occupation. A thorough visual inspection and, if appropriate, reassurance air sampling with disturbance will be required.

In circumstances where the building is still occupied and in use at the time of the refurbishment/demolition survey, the university and surveyor will need to co-ordinate personnel and equipment/furnishings etc. being decanted and protected as necessary while the survey progresses through the building.

The refurbishment/demolition survey is designed to be used as a basis for tendering the removal of ACMs from the building prior to demolition or major refurbishment so the survey does not assess the condition of the asbestos, other than to note areas of damage or where additional asbestos debris may be expected to be present. However, if it will be more than 3 months before the contract starts an assessment of condition may be relevant.

In larger, complex buildings where there are on-going alterations and refurbishment of the premises, the refurbishment/demolition survey will only be used for the project under which it was commissioned.

If the project extends beyond the area surveyed, this additional area will require a survey. If the project fails to go ahead but is re-activated at a later date, the refurbishment/demolition survey report should not be used if it is more than 6 months old.

In circumstances such as these, the surveyor should be contacted to provide advice and whilst a full survey may not be necessary, the surveyor can insert an addendum stating the validity of the report appropriate to the change to the project.

5.2.6 Survey restrictions and caveats

The usefulness of the survey, regardless of type, can be seriously undermined where the client/dutyholder or surveyor imposes restrictions on the scope of the survey or techniques/method used to survey. Any restrictions will reduce the extent to which asbestos materials are located and identified, incur delays, etc.

To maximise the usefulness of the survey the university will, in conjunction with the surveyor, consider the survey area and take the following into consideration:

- Locked/secure rooms and access arrangements
- Height and safe access
- Confined spaces
- Live electrical switchboxes and/or distribution boards
- Occupied areas above and/or below the survey area
- Operational plant/equipment, lift shafts and/or motor rooms
- Site specific hazards such as radiation, chemicals, sharps
- Location of ALL services - heating, gas, ventilation
- Past history of the building
- Has the surveyor to 'make good' at the end of the survey

If either the university or surveyor imposes restrictions on the scope or extent of the survey, this **must** be agreed in writing by both parties and clearly documented.

5.2.7 Survey report

The report issued following a survey must be in written format, supplied either as hard copy and/or as an electronic document. The document should be comprehensible and usable by the University.

The general layout of a report should contain:

- Introduction including the scope of work
- General site information such as age, type, size, etc. of building
- Survey information including survey strategy, sampling and analytical procedures, etc.
- Survey results including material assessments, photographs, where applicable
- Areas NOT accessed, or other problem areas clearly listed and give reasons such as 'no key available'

- Discussion of findings, results and other relevant information
- Conclusions
- Remedial actions which may be generic or site-specific
- Certificate of Analysis which must have UKAS logo on it

If the report is long and/or complex, the report will benefit from an executive summary. This section should be no more than one page and give a brief overview of the survey findings.

Information regarding survey methods, material assessments and remedial actions may be incorporated into appendices. This gives the reader easier access to the relevant information.

The findings of the survey have been used to provide information as to the risk presented by the asbestos in question and enable actions to be prioritised accordingly.

The findings of the surveys are recorded onto buildings plans and recorded in the Asbestos Register held by Property & Facilities and made available to schools/services anticipating contract work that may encounter asbestos.

5.2.8 Asbestos labelling

Where it is thought appropriate, Property & Facilities will label areas/items where asbestos has been assessed to be in a satisfactory condition or has been encapsulated. This will enable people working in these vicinities to stop working in the event their activities could alter the condition of the asbestos. Where necessary this information will be made known to external contractors.

Where asbestos labelling is installed in schools/services (as against service ducts etc.) then the location and integrity must be incorporated into managed inspections carried out on behalf of Property & Facilities by a competent contractor. The frequency of these inspections will be carried out at intervals laid down in the Asbestos Risk Assessment. All schools/services have a duty to report any damage to materials which have been identified to contain asbestos to Property & Facilities.

In addition, there are some non-asbestos materials used within the various premises. Where appropriate, these will also be labelled to indicate that they are 'non-asbestos'.

In service and plant room type areas, the standard asbestos or non-asbestos safety sign or warning tape will be displayed. In public or sensitive areas a discreet form of labelling/identification will be applied (for example – a 3cm² red square, with letter 'A' for asbestos materials and a 3cm² green square, with letters 'NA' for non-asbestos materials).

5.2.9 Monitoring of asbestos in known locations

It is policy that a re-inspection programme is carried out on an annual basis, or more frequently, to ensure the ACM's are being managed.

In addition, an audit of Edinburgh Napier University's asbestos management procedure will be carried out on an annual basis. This audit will assess that:

- Staff are aware of the presence of asbestos

- Staff and contractors are following the procedures for notifying asbestos in poor condition
- Notifications of asbestos in poor condition are being dealt with promptly
- Modifications are made to the asbestos policy in light of any changes to procedures

On completion of any work in a building it is important that areas are inspected to confirm that there has not been any deterioration in the condition of the asbestos-containing materials.

In premises where the only asbestos materials known to be on the site are bonded into a matrix and have not shown any signs of deterioration, the re-inspection period may be greater than annually on advice from the Asbestos Adviser.

All reports indicating a deterioration in the condition of the asbestos will trigger the University Asbestos Management Plan (Appendix 1).

5.2.10 Information, instruction and training

Under Regulation 10 of the Control of Asbestos Regulations, there is a requirement to provide information, instruction and training to employees who are liable to be exposed to asbestos so that they are aware of the risks and the precautions to be taken. It is advised that after initial training, refresher training is given on an annual basis.

Training courses will be available for staff in all university schools and services as appropriate and external contractors regarding their roles in implementing this policy and management plan. The need for further training is under constant review and provided as appropriate. Information is provided in the form of HSE guidance.

This training should be appropriate to the employee's responsibilities within the company and should consist of such topics as:

- Legislation
- Types of asbestos
- Health hazards
- Asbestos materials in buildings
- Prevention/control of exposure
- Managing asbestos contracts and contractors
- The university Asbestos Policy

There is also a requirement to ensure, so far as is reasonably practicable, that non-employees who may be on the premises and affected by work involving asbestos are given adequate information, instruction and training including risks from the rearrangement of thoroughfares and fire exists. It is important that these employees are informed of the risks arising from the disturbance of asbestos and the actions to take when either asbestos is disturbed or they discover asbestos in a poor condition.

5.2.11 Use of contractors

The replacement, removal, sealing and major work to asbestos containing materials shall be carried out by licensed contractors engaged solely by Property & Facilities who shall be responsible for the supervision, and the work shall be carried out in accordance with the legal requirements and the HSE

Code of Practice. Prior to the commencement of work by a licensed contractor, Property & Facilities shall notify the University Health and Safety Team and consult with the school/service concerned what works will be getting carried out, the duration of the contract and make arrangements as appropriate for monitoring and clearance certificates.

Contractors engaged by Property & Facilities/school or service who carry out non 'major' work in close proximity of asbestos will also be informed of the location of the asbestos materials so no inadvertent contact and potential damage results.

As a general rule, work may be carried out up to 0.5m from any asbestos materials. If the proposed work is within 0.5m then the work must contain enhanced controls. This limit does not apply to flooring materials.

5.2.12 Contractors engaged by schools/services

Schools/services are required to follow the University guidance. Schools/services engaging contractors for activities listed below should be aware that such activities may unexpectedly encounter asbestos material. This list is not to be seen as exhaustive. All works, whatever their nature, should be considered in light of potential asbestos.

- a) Lighting
- b) Electrical wiring extensions
- c) Telephone connections
- d) Security systems
- e) Computer trunking
- f) Installing of scientific equipment and associated pipe work
- g) Ventilation ducting
- h) General maintenance
- i) Flooring

Note:

- Where cables/pipework etc. are passed through walls, fire stopping must be carried out prior to completion to prevent fire spread (with relevant signs and certification).
- Where asbestos is removed, relevant fire stopping materials are to be installed prior to completion of works.
- Schools/services may not engage contractors to work on such activities (a to i) where asbestos has been identified. Property & Facilities will be responsible for the removal or making safe prior to the commencement of any works requested by the relevant school or service. If during works ordered by the school/service a suspected asbestos containing material is found, then the school/service must immediately stop and the concern reported to Property & Facilities. Property & Facilities will organise for the material to be identified and remedial work carried out prior to the original works restarting.

5.2.13 Encountering asbestos during maintenance work

Prior to maintenance work commencing, the relevant area should be checked against the Asbestos Register to note if the presence of asbestos has been recorded.

Should any material or dust suspected of containing asbestos be encountered work should immediately stop and the concern reported to Property & Facilities. The University Asbestos Management Plan (Appendix A) should be followed.

5.2.14 Precautions

If any work is to be undertaken which may result in accidental damage to asbestos containing material, such as insulation in duct systems, ALL operatives must wear respirators and disposable overalls of the appropriate full cover type. These safety items should be issued by the supervisor responsible for the work.

On completion, all disposable items should be removed, bagged, labelled and stored in a place of safety, until arrangements for their uplift and disposal have been made with a licensed contractor.

5.2.15 Short duration tasks

In areas where asbestos is known to be present, tasks such as drilling or installing screws will require an assessment of the risk factor involved and will be issued together with any safety precautions and equipment. People in the immediate vicinity who are not concerned in operations should be directed to leave. The assessment should be carried out by a competent member of Property & Facilities or by competent contractors' staff of those who will be carrying out the works. Other tasks, such as the moving of ceiling tiles to gain access to ceiling voids, should necessitate the wearing of safety equipment. The area in the immediate vicinity should be cordoned off and access denied until the job is complete, where the risk assessment identifies the need.

5.2.16 Uncontrolled asbestos fibre release

This policy if adhered to should render this event extremely unlikely. Where such an incident does occur and it is thought the concentration of fibres may exceed the appropriate control limit, the following procedure should be implemented.

- The area in question should be immediately evacuated and actions taken to secure the area at a safe distance to stop entry by unauthorised persons.
- The Health & Safety Team (by [email](#) or 0131 455 6377) and Property & Facilities (0131 455 5000) should be informed as soon as possible.
- The University Asbestos Management Plan (Appendix 1) will then be initiated.
- Any necessary measures to seal or remove the asbestos material will be carried out by licensed contractors.
- Air sampling will be undertaken to confirm if area suitable for personnel to re-occupy or use.
- No access will be allowed to personnel until this clearance has been obtained.

5.2.17 Disposal arrangements

Licensed contractors carrying out work on behalf of the university which generate asbestos contaminated articles will be responsible for the collection, storage and disposal of such items.

Disposal of asbestos materials arising through short-term maintenance work will involve the statutory procedures as stated previously.

Any school/service wishing to dispose of any asbestos shall contact the University Health & Safety Team who shall issue the appropriate advice and instructions.

6 Compliance Monitoring

Any management system, if left alone, will deteriorate over time. Where asbestos is concerned this could prove fatal. It is therefore a requirement of this Code of Practice that the Director of Property & Facilities will periodically monitor that this statement remains relevant and effective and will from time to time require certain information from Property & Facilities. This will include (inter alia): copies of statements of local safety statements; risk assessments relating to entry into and work within confined spaces; systems of work (including permits to work); records of these and other related activities.

7 Further Guidance

- Health & Safety at Work etc. Act
- Managing and working with asbestos – Control of Asbestos Regulations. Approved Code of Practice and Guidance L143 (second edition)
- Management of Health & Safety at Work Regulations and Approved Code of Practice
- Asbestos and man-made mineral fibres in buildings: practical guidance (DETR)
- Managing asbestos in buildings (INDG223)
- Asbestos: The licensed contractors' guide (HSG247)
- Asbestos: The survey guide (HSG264)
- Asbestos Essentials: Task Manual (HSG210)
- Asbestos: The Analysts' Guide (HSG248)

Appendix 1 – University Asbestos Management Plan

Arrangements

Responsibility

The Nominated Person(s) can be contacted through:
Property and Facilities Service Desk Contact No. 0131 455 5000

Asbestos register information

Several University buildings have been surveyed and a register compiled. The register contains details of location and condition of asbestos containing materials. The register is held by Property & Facilities. An asbestos register is available at each campus site. Based on this information, risk assessments have been/will be undertaken and decisions made on whether to remove, repair or leave untouched and manage the associated procedure. Should asbestos material be discovered or damaged, point 1 of the Management Plan Implementation should be followed. These risk assessments will be held centrally by the university in Property & Facilities.

Monitoring

A programme of routine inspections of the locations recorded in the Asbestos Register will be carried out and the results held centrally by the University in Property & Facilities. In the event that this monitoring indicates deterioration in the condition of asbestos containing material, in such that either repair or removal is now required, points 2 – 10 of the Management Plan Implementation should be followed.

Obligations to contractors/staff

All personnel employed by the University in relation to asbestos removal/repair work will be licensed and taken from HSE or other approved appropriate lists. A copy of the University's Asbestos Policy and Management Plan will be supplied to these contractors by the University's Property & Facilities.

All contractors undertaking work in areas recorded on the Asbestos Register will be given information on the location and condition of the asbestos containing material for that specific area. This information will be supplied by the University's Property & Facilities.

University maintenance staff undertaking duties in areas recorded on the Asbestos Register will be informed of the location and condition of asbestos containing material.

All work in areas recorded on the Asbestos Register will be closely monitored with the use of the Asbestos Permit to Work System.

Future surveys

Information obtained on buildings/areas found to contain asbestos containing material by either Type 2 or 3 or subsequent management or refurbishment/demolition surveys will be placed on the Asbestos Register by the University Property & Facilities.

Policy: Asbestos Management Policy
Revision Date: October 2023
Version: 1.0
Author: Health and Safety Office, Edinburgh Napier University

Implementation

1. In the event of asbestos (or suspected asbestos) material being discovered unexpectedly or being damaged, all work must cease and the incident reported to the University Asbestos Nominated Person.
 - The immediate area will be sealed off until it has been inspected by the Asbestos Nominated Person or externally appointed contractor.
 - Samples of the suspected asbestos materials will be removed only by an approved/competent contractor and sent to a suitably accredited laboratory for analysis so as to determine the method by which work proceeds.
 - If the presence of asbestos, in a condition likely to lead to a health risk, is confirmed the area will remain sealed and warning notices will be posted by Property & Facilities or Health & Safety Office until the asbestos has been removed or rendered safe by sealing or encapsulation.
2. Where asbestos has positively been identified as potentially hazardous and, as a result of a risk assessment or routine monitoring, sealing or encapsulation is the preferred option this will be carried out as follows:
 - By specifically trained Property & Facilities staff, but only where the work is of sufficiently small nature as to be able to be carried out in compliance with Regulation 3(2) of CAR and using at all times methods in compliance with “Work with materials containing asbestos” (ACOP L143) or;
 - By a specialist licensed asbestos contractor, approved by the Health and Safety Executive in accordance with CAR Regulation 8, and using at all times methods in compliance with the Control of Asbestos Regulations.
3. Where asbestos has positively been identified as hazardous and, as a result of a risk assessment, removal is the preferred option this will be carried out as follows:
 - By a specialist licensed asbestos removal contractor, approved by the Health and Safety Executive in accordance with Regulation 8 CAR, and using at all times methods in compliance with the Control of Asbestos at Work Regulations.
 - Where a building material containing asbestos has been removed, in whole or part, it shall be replaced with a material that has no asbestos content.
 - Where, on completion of the removal, some residual asbestos remains due, for example, to its inaccessibility or location, it will be enclosed or encapsulated appropriately together with adequate identification.
 - The Asbestos Register will be amended to take into account the removal and, if appropriate, any remaining material.
4. The University’s Asbestos Nominated Person(s) will be informed in advance, of:
 - All asbestos removal or encapsulation work
 - All work which involves the disturbance of asbestos materials

The Occupational Health Service and the Health and Safety Team will be informed in advance, via the Asbestos Nominated Person, of:

- All asbestos removal or encapsulation work.
- All work which involves the disturbance of asbestos materials.
- Any incidence where asbestos or suspected asbestos material is encountered or disturbed unexpectedly.

5. Where work with asbestos materials is to be carried out within a University area this can only be carried out by Property & Facilities and the relevant competent contractors. The Asbestos Nominated Person (Contractor) will liaise with the asbestos worker and a representative of the school/service prior to commencement of such work. This so as to explain the methodology of the work in question to school/service staff, in order that any concerns that they may have, as to the effects of such work on their health, may be allayed. A permit to work will be issued to the competent contractor to carry out the works.
6. Where work with asbestos materials is to be carried out within a University area by a licensed contractor, the Asbestos Nominated Person will arrange a briefing meeting, prior to commencement of such work, between:
 - Themselves, and;
 - The Property & Facilities Service Desk;
 - The licensed contractor or their representative, and;
 - The Occupational Health Service representative, and;
 - A representative from the school/service in which the work is to take place e.g. School Safety Coordinator.

This is for the purpose of discussing/explaining method statements, emergency procedures, air monitoring strategies, etc. so as to allay concerns and avoid unhelpful rumour developing among the school/service staff.

7. Where asbestos removal work is to be carried out by a licensed contractor, the Asbestos Nominated Person will:
 - Liaise with the licensed contractor prior to the work commencing, this is to ensure safe working methods are put in place.
 - Arrange to carry out air monitoring during the removal operation, this is in order to make sure that the control measures employed are keeping the concentration of asbestos in the air outside the enclosure as low as is reasonably practicable.
 - Arrange to carry out a visual check after removal is complete, this is to ensure that all visible traces of asbestos have, so far as is reasonably practicable, been removed.
 - Arrange to carry out clearance air monitoring after the visual check is complete (see Appendix 3), this is in order to ensure that any airborne concentration of asbestos is below 0.01f/ml (the clearance indicator) and that the area is safe to be returned to normal use.
8. A 4 stage clearance certificate of re-occupation will be obtained by Property & Facilities from a UKAS accredited analytical laboratory, contracted by the university, before the area is returned to the user for occupation. An additional copy will be issued to the removal contractor.
9. Asbestos waste, resulting from all works carried out, will be double bagged or double wrapped in polythene and clearly marked as asbestos waste before removal from site. This will be stored in a secure store for subsequent disposal via a licensed disposal contractor.
10. Asbestos waste, resulting from works carried out by a licensed contractor, will be directly disposed of by the licensed contractor as an integral part of the contract.

Non-compliance with any of the requirements of this Policy and/or Code of Practice will be deemed a breach of contract and may be subject to disciplinary procedures or contract penalties.

Appendix 2 – Air Monitoring

Air Sampling	Description	Note
Personal sampling	<ul style="list-style-type: none"> ▪ To check the effectiveness of control measures ▪ To determine whether the control limit is exceeded ▪ Confirm that respiratory protective equipment (RPE) is adequate ▪ For medical surveillance records ▪ To support current/future risk assessments 	Sampler worn by operative.
Static sampling		Sampler located within an area.
Background	Can establish fibre concentration before any work activity proceeds. Particularly useful if other non-asbestos fibres likely to be present.	
Leak testing	Ensures that steps taken to contain asbestos during removal are effective.	<p>Collected outside enclosure.</p> <p>Recommended in areas where building occupiers are in proximity to the works. The frequency of testing will be proportionate to the amount of asbestos being removed/worked on. For some small or minor removal works, no leak testing will be undertaken. For larger works, the monitoring may be intensive or frequent at the start and, if there are no leakages, reduced as the work progresses.</p>
Site certification for re-occupation	Ensures that fibre concentrations are <0.010 f/ml on completion of asbestos removal/remediation work.	See also Site Testing (Appendix 3).
Reassurance sampling	Confirm that residual fibre concentrations are <0.010 f/ml after removal of enclosure. Can also be used to determine fibre concentrations if asbestos has been disturbed.	

Appendix 3 – Site Tests

Site Test	Description	Detail
4-stage Certificate of re-occupation (4SCR)	Stage 1 – preliminary check of site condition and job completeness	Check <ul style="list-style-type: none"> ▪ method statement/scope of work ▪ integrity of enclosure ▪ job completeness ▪ transit route (between enclosure and waste skip) ▪ functioning site equipment (shower unit, extract equipment, etc)
	Stage 2 – thorough visual inspection	ALL surfaces - check for removal of dust/debris, fibrous material (i.e. glass fibre, carpets, etc) including fine settled dust
	<p>For some enclosures, problems may be encountered. Some of these problems can arise due to poor/insufficient planning by the Project Manager and/or the asbestos removal contractor.</p> <p>Examples of problems within enclosures are:</p> <ul style="list-style-type: none"> ▪ water and/or wet surfaces ▪ use of sealant by contractor before authorised to do so by the analyst (only used for areas where there are other dust sources i.e. concrete) ▪ loose rubble-type floor ▪ asbestos remaining in situ, i.e. wall packer ▪ inaccessible asbestos <p>It is important for the Project Manager to carry out an initial assessment of the area with the contractor and the analyst prior to the work commencing to address any issues which could arise.</p>	

Site Test	Description	Detail
	Stage 3 – clearance indicator air sampling	Air sampling to determine fibre concentrations <0.010f/ml before removal of the enclosure. NOTE - Where 5 or more samples are collected, 20% may be between 0.010 and 0.015 f/ml
	Stage 4 – final assessment post-enclosure/work area dismantling	Analyst will attend site during dismantling of enclosure to check for any residual asbestos. Reassurance air tests may be carried out.

On satisfactory completion of all 4 stages a Certificate of Re-occupation will be issued by the analyst to the Project Manager and/or the Asbestos Officer. The asbestos removal contractor may also be issued with a copy.

The hygiene facility (shower unit or decontamination unit) will be inspected and air sampling carried out (stages 2 & 3 of the 4SCR) and a certificate issued to the asbestos removal contractor prior to the facility being removed from the site.

This test is not required if the facility is removed to a place of safety overnight until the contract is complete.

For contracts lasting more than 7 days, the facility should be inspected and tested at agreed intervals, i.e. weekly.

In some areas, the asbestos removal contractor will carry out remedial work often referred to as an environmental clean. This is undertaken within areas such as plant rooms to remove residual asbestos as a result of poor removal in the past. In instances such as these, the contractor may or may not construct an enclosure (this is dependant on the scope of work, location, etc).

If the contractor carries out the work within an enclosure the steps detailed in the Air Sampling and Site Testing tables above should be followed. Where there is no enclosure, this **MUST** be agreed, before work starts, with the Asbestos Officer and static air samples collected at appropriate locations.