

Asbestos

Policy and Management Plan

Authors: People and Culture, Estates

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Revision	Author	Date	Details
1.2	C Saunders / R Green	Dec 2017	Updates to responsibilities to align with new Estates Management Section structure. Added definition of Asbestos Manager and made the Director IT Services an Asbestos Manager.
1.3	R Green	May 2019	Addition of Senior Facilities Manager (Southend and Loughton)
1.4	R Green	April 2023	Periodic review and Responsibility update.

Section 1: Policy Statement

The Control of Asbestos Regulations 2012 requires employers to prevent exposure of asbestos to anyone using or working in the University premises. This control plan sets out the current and future measures that have been put in place to comply with the Regulations.

The University of Essex aims to:

- Prevent as far as is reasonably practicable exposure of employees, contractors, students and the public to asbestos fibres.
- Carry out periodic assessments of the asbestos containing materials (ACMs) present within all buildings within the scope of the Universities property portfolio.
- Provide and maintain an up-to-date asbestos register / survey.
- Record all information accurately and competently with updates as required in accordance with relevant legislation.
- Ensure the information is available to those who may be affected or are potentially at risk, and to freely provide this information upon request.
- Implement a Management Plan that aims to control the risks as far as is reasonably practical, through a combination of monitoring, remediation, and removal when necessary.
- Ensure that no ACMs are worked on by untrained personnel.
- Encourage staff and contractors to work towards a positive asbestos culture which encourages proactive risk assessment and reduces reactive risk from ACMs whenever possible.
- Carry out regular information sharing and training to achieve the aims listed in the Asbestos Policy.
- Comply with all relevant current legislation regarding asbestos in accordance with L143 Control
 of Asbestos Regulations 2012 Approved Code of Practice.

The Management Plan

- Details how University of Essex manages ACMs found within its buildings.
- Sets out roles and responsibilities and required competencies of those with responsibilities.
- Outlines how the asbestos register (i.e. the asbestos survey portfolio) is derived, maintained and communicated.
- Describes procedures for inadvertent release or exposure.

Those with responsibilities under this Policy and Management Plan must ensure they understand what is expected of them and comply with the Management Plan, current legislation, Health and Safety Executive (HSE) Guidance and good practice.

Section 2: Responsibilities of Duty Holder and Asbestos Managers

2.1 University of Essex

Full details of health and safety responsibilities of all employees can be found in the University's <u>Health and Safety Policy</u>. The general responsibilities given in the Health and Safety Policy apply to the management of health and safety risks arising from asbestos. This document sets out specific duties and responsibilities for the implementation and management of the Asbestos Management Plan as follows:

Key: PDH = Principal Duty Holder, **DH** = Duty Holder, **AM** = Asbestos Manager (Manager with overall responsibility for arranging works that have the potential to disturb asbestos)

(Deputy acts as the person with the main responsibility in their absence)

Position (Deputy)	Role	Responsibility		Responsibility	
Deputy Registrar (Infrastructure & P Environments)		Overall responsibility for ensuring that there are effective arrangements in place and that there are adequate resources allocated to the management of asbestos on the University's Estate.			
		Overall responsibility for the strategy and implementation of the University's Asbestos Management Plan. The Director of Estates will ensure – for the Principal Duty Holder – that:			
	DH	(a) the plan is reviewed and if necessary revised at least once every 3 years, and without delay if			
		(i) there is reason to suspect that the plan is no longer valid, or			
Director of Estates		(ii) there has been a significant change in the premises to which the plan relates			
		(b) the measures specified in the plan are implemented; and			
		(c) the measures taken to implement the plan are recorded.			
		Also responsible for:			
		■ Ensuring that all relevant senior managers within Estates are aware of the policy and expectations and that these senior			

		managers have suitable / sufficient processes in place to ensure compliance. Ensuring that the Estates teams are suitably trained,		
		competent and equipped to perform their role.		
		Responsible for asbestos management within the built environment across the University's Estate (with the exception of commercial buildings overseen by the Head of Commercial Properties and Knowledge Gateway):		
		Day-to-day responsibility for managing the control of asbestos, including organising asbestos condition monitoring in line with the asbestos risk assessment requirements and that any necessary remedial action is undertaken and organising record storage for all three campuses.		
Building Surveyor	AM	 Ensuring that the Asbestos Management Plan for all three campuses is delivered via the Estate Management Maintenance Team and competent specialist contractor(s). 		
and Safety Manager		 Ensuring that the control of asbestos is taken into account as part of refurbishment and new build projects. 		
		No work is undertaken that gives likelihood to the disturbance of asbestos containing material unless that work is carried out by a specialist contractor whilst fully complying with the "Control of Asbestos Regulations 2012".		
		Monitoring the performance of the specialist asbestos management contractor and informing the Director of Estates and any other relevant Directors of any failures in performance so appropriate action can be taken.		
		■ Ensuring that Asbestos Condition is monitored periodically.		
		■ Ensuring that records are stored in line with <u>Section 5</u> below.		
Building Services and Safety Manager.		Responsible for ensuring that:		
Building Surveyor		 All staff are suitably trained, competent and equipped to perform their role, where applicable. 		
and Safety Manager	AMs	 No work is undertaken that gives likelihood to the disturbance of asbestos containing material unless that work is carried out 		
Senior Facilities and Safety Manager.		by a specialist contractor whilst fully complying with the "Control of Asbestos Regulations 2012".		
Senior Project and Safety Manager		No work can commence unless all three following items are fully confirmed.		

		 There is no record of asbestos existing, recorded within the Asbestos Register or Refurbishment / Demolition Surveys, for the proposed work location (e.g. wall or fabric being drilled). There is no record of asbestos existing, within the Asbestos Register or Refurbishment / Demolition Surveys, with regards to similar locations (e.g. adjacent accommodation). There is no record of asbestos existing, within the Asbestos Register or Refurbishment / Demolition Surveys, with regards to similar environments (e.g. infill panels above Fire doors). Surveys are undertaken as necessary for any works under their management and appropriate actions taken. Records are stored in line with Section 5 below.
		Responsible for overseeing the management and control of asbestos in University owned leased premises (commercial buildings), including ensuring that:
	AM	 Responsibilities in relation to the control of asbestos are adequately addressed through tenancy agreements.
Head of Commercial Properties & Knowledge Gateway		 Tenants are aware of their legal responsibilities relating to asbestos management
		No work is undertaken within the tenant's demise that is likely to disturb asbestos containing material unless that work is carried out by a specialist contractor whilst fully complying with the "Control of Asbestos Regulations 2012".
		Management and control of asbestos risk takes place, including asbestos condition monitoring in line with the asbestos risk assessment requirements and that any necessary remedial action is taken.
		■ Records are stored in line with <u>Section 5</u> below.
	•	 Deputy Registrar (Infrastructure & Environments) is informed of any failures in performance, relating to asbestos management within the tenants' demise, so appropriate action can be taken.
		 All staff are suitably trained, competent and equipped to perform their role, where applicable.
Director of DITS	АМ	Responsible for ensuring that no work is undertaken that gives likelihood to the disturbance of asbestos containing material unless that work is carried out by a specialist contractor whilst fully complying with the "Control of Asbestos Regulations 2012" and

that the relevant University of Essex Estates Asbestos Manager is informed of all details of the work.

They must ensure that staff and contractors review the relevant asbestos information and ensure compliance with the following:

- Staff and contractors undertaking any works are appropriately asbestos trained.
- Supervisory staff and contractors have had full regard to the Asbestos Management Plan and have reviewed the asbestos registers and plans.

No work can commence unless <u>all three</u> following items are fully confirmed:

- There is no record of asbestos existing, recorded within the Asbestos Register or Refurbishment / Demolition Surveys, for the proposed work location (e.g. wall or fabric being drilled).
- There is no record of asbestos existing, within the Asbestos Register or Refurbishment / Demolition Surveys, with regards to similar locations (e.g. adjacent accommodation).
- There is no record of asbestos existing, within the Asbestos Register or Refurbishment / Demolition Surveys, with regards to similar environments (e.g. infill panels above Fire doors).

In the event of uncertainty, or any lack of information with regards to the above works are **not** to proceed until written approval is obtained from the relevant Estates Asbestos Manager.

Any doubt at all, then contact the relevant Estates Asbestos Manager before continuing.

2.2 University of Essex Campus Services (UECS), Wivenhoe House Hotel, Students' Union, Tenants

As separate legal entities these organisations are responsible for complying with legal requirements and relevant HSE guidance in so far as it relates to their business. They must identify their duty holders and Asbestos Managers for the control of asbestos risk within their organisation's policies for health and safety and their Asbestos Management Plan.

As users of the University of Essex premises they are required to support the University of Essex in meeting its responsibilities in relation to management of the asbestos risk in the management of the Estate. This support included ensuring that asbestos material remains in good condition and is not disturbed.

In addition, they must ensure that where any repairs, alterations, improvements or modifications that may involve disturbing, cutting through or drilling into the building fabric are required, they arrange for the work to be procured and managed by the Estate Management Section. On **no account** are activities that may disturb the fabric of the building to be undertaken without prior referral to the Estates Management (Building Services) Team and formal written approval having been obtained prior to works.

There is also a responsibility to inform the Estate Management Help Desk if they discover any damage to material that may contain asbestos.

Section 3: Other Responsibilities

The University has identified key people within the organisation who have a specific role in relation to the control of asbestos risk in the sections below.

3.1 University of Essex Employees (Including Consultants) Managing & Supervising Projects

University of Essex employees (and consultants) who manage or supervise projects which involve work on the building fabric must ensure that staff and contractors review the relevant asbestos information and comply with the following:

- Staff and contractors who undertake any works are appropriately asbestos trained.
- Supervisory staff and contractors have full regard to the Asbestos Management Plan and have reviewed the asbestos registers and plans

No work can commence unless all three following items are fully confirmed:

- There is no record of asbestos existing, recorded within the Asbestos Register or Refurbishment / Demolition Surveys, for the proposed work location (e.g. wall or fabric being drilled).
- There is no record of asbestos existing, within the Asbestos Register or Refurbishment / Demolition Surveys, with regards to similar locations (e.g. adjacent accommodation).
- There is no record of asbestos existing, within the Asbestos Register or Refurbishment /
 Demolition Surveys, with regards to similar environments (e.g. infill panels above Fire doors).

In the event of uncertainty, or any lack of information with regards to i, ii, iii works are **not** to proceed until written approval is obtained from the Estates Management (Maintenance) Team.

Any doubt at all, then contact the relevant Asbestos Manager before continuing.

3.2 Mechanical, Electrical and Buildings Craft Teams

Undertake the day-to-day activities to maintain and repair the fabric and systems on the Estate. It is the responsibility of the team members to:

- Be aware of their responsibilities to comply with the Asbestos Policy and Management Plan.
- Be aware of the risk to themselves and others associated with their works.
- Understand the reporting procedure in the event of an asbestos incident (see sections 8 and 9).

3.3 Workplace Health Safety and Wellbeing (WHSW)

WHSW Health and Safety Advisers are responsible for:

- Advising the Duty Holder or their appointed representative (in writing) of any changes in legislation or HSE guidance in relation to control of asbestos.
- Ensuring that the Asbestos Management Plan is updated in a timely manner to reflect these changes.
- Undertaking periodic audit of the Asbestos Management Plan to review documentation for compliance with this Asbestos Management Plan and to review training needs.
- Developing and keeping under review the Asbestos Policy and Management Plan, in consultation with relevant Asbestos Managers within Estates and the appointed specialist contractor(s).
- Advising and assisting with RIDDOR reporting as necessary.

3.4 Heads of Department¹

All Heads of Department (with exception of IT Services), must ensure that where any repairs, alterations, improvements or modifications that may involve disturbing, cutting through or drilling into the building fabric are required, they arrange for the work to be procured and managed by the Estate Management Section. On **no account** are activities that may disturb the fabric of the building to be undertaken without prior referral to the Estates Management (Maintenance) Team and formal written approval obtained prior to works.

Heads of Department must also inform the Estate Management Help Desk if they discover any damage to material that may contain asbestos.

3.5 Specialist Asbestos Consultant(s) / Contractor(s)

When commissioned will:

- Provide competent advice as required.
- Manage asbestos related works only on behalf of the U of E where requested.
- Carry out Refurbishment and Demolition Surveys as required.

¹ Throughout this Policy the term department should be understood to include school, faculty team, section, or unit.

- Organise and oversee sampling of suspected asbestos material.
- Provide "clearance" monitoring as necessary.
- Provide relevant training for U of E staff.
- Carry out asbestos related work including asbestos removal.
- Carry out reassessment surveys at regular intervals
- Provide appropriate asbestos training

Whilst carrying out the above duties the Consultant(s) / Contractor(s) must:

- Ensure that their staff are competent.
- Be aware of their responsibilities to comply with the Asbestos Policy and Management Plan.
- Understand the reporting procedure in the event of an asbestos incident.

Section 4: Risk Assessment

Asbestos Management Surveys have been carried out for all relevant University of Essex Campus buildings. All ACMs known to be present are in good condition, have been encapsulated or are safe and inaccessible. See Appendix 1 for the Schedule of Asbestos Surveys with risk level and monitoring against each line item for all buildings.

Providing there is no unauthorised work on, or damage to, the building fabric the only persons considered to be at risk are maintenance workers and installation and construction operatives. There are control measures in place to eliminate any risk to these people.

Note: Some asbestos containing material is labelled, but this must <u>never</u> be relied upon as the only asbestos information. Relevant asbestos surveys must always be consulted, or new ones carried out, unless there is <u>certainty</u> that asbestos will not be disturbed.

Refurbishment and demolition (R & D) surveys are completed in all areas where major building work is planned. ACMs that could potentially have been disrupted are removed from these areas prior to work commencing. Survey contractors will not be permitted to bid for any identified removal work. The only exception to this rule is where low cost (below £1,000) work is identified and removal by the Survey Contractor has been agreed by Estate Management.

Section 5: Record Keeping

All Asbestos Managers appointed by the University must understand their responsibilities for record keeping, and maintain safe and complete records of the following for at least 5 years (to be kept in a secure shared University of Essex Drive):

- Current Asbestos Policy and Management Plan (and an archive of previous Asbestos Management Plans)
- Records of formal consultation on the Policy and Asbestos Management Plan
- Asbestos Management Surveys (to be kept indefinitely)
- Asbestos Refurbishment and Demolition Surveys (to be kept indefinitely)
- Current risk assessments and an archive of previous risk assessments
- Remedial action arising from risk assessments
- Completed work sheets (for asbestos related works including removals)
- Incident reports and investigations
- Reports of condition monitoring
- Reports from specialist contractors
- Records of information, instruction and training to be recorded on iTrent.
- Records of correspondence with external consultants and contractors.

Training records

Asbestos Managers must forward records of formal instruction and training to their administrative support for uploading to iTrent. Certificates of training must be forwarded to People and Culture for adding to the individual's personal records.

Uncontrolled release of asbestos resulting in an employee exposure

Where an employee has potentially been exposed to asbestos fibres in an incident, a note that the exposure has occurred must be made on that employee's health record. If the employee does not have a health record, the note must be made on that employee's personal record. It should be kept for **40 years** from the last date of entry or until the employee reaches **80 years** of age whichever is longest.

Section 6: Competency Training and Awareness

The University recognises the legal obligation to provide employees with adequate training and to review their awareness and competency for the required tasks.

- Director of Estates: will attend asbestos awareness training at least once every 5 years.
- Asbestos Managers: listed on this Asbestos Management Plan will attend appropriate "Management of Asbestos in buildings" training at least once every 3 years. The only exception to this is the Director of IT Services will attend asbestos awareness training at least once every 5 years.
- Where Asbestos Managers nominate others, to carry out significant asbestos related actions on their behalf, the nominee should also attend "Management of Asbestos in buildings" training at least once every 3 years.
- U of E personnel carrying out day to day activities to maintain and repair the fabric and systems on the Estate will annually attend asbestos awareness training. University staff will not work on any asbestos containing material without direct authorisation, being sufficiently well trained and having written authority from the relevant Asbestos Manager.
- All U of E personnel who manage activities where the fabric of the buildings may be affected will attend asbestos awareness training at least once every 3 years.
- Job roles listed under <u>sections 3.1 to 3.4</u> (Other Responsibilities) must have attended asbestos awareness training at least once every 5 years.
- External Contractors and Consultants will be required to demonstrate that their staff are adequately trained.

Note: Only people sufficiently trained can carry out non-licenced work on asbestos containing material and only HSE Licenced contractor(s) can be used for all licenced work on asbestos containing material. <u>Appendix 2</u> gives more details on licenced and non-licenced work.

Section 7: Prevention, Control and Monitoring

The University of Essex controls the asbestos risk as detailed below:

7.1 Condition Monitoring of Asbestos Containing Material

Following formal Risk Assessment between Estates and the Asbestos Consultant, all identified exposed asbestos containing material is formally "Condition Inspected" on an annual basis and any necessary remedial work completed. If following an annual inspection any concerns are raised the condition monitoring period may be shortened.

7.2 Control of Contractors

All University staff involved directly or indirectly in the appointment or management of contractors or works involving building structures or must ensure that:

 Contractors have had full regard to the Asbestos Management Plan and have reviewed the asbestos registers and plans.

No work can commence unless all three of the following items are fully confirmed:

- There is no record of asbestos existing, within Asbestos Management or Refurbishment /
 Demolition Surveys, within the proposed work location (I.E wall or fabric being drilled).
- There is no record of asbestos existing, within Asbestos Management or Refurbishment /
 Demolition Surveys, with regards to similar locations (I.E adjacent accommodation).
- There is no record of asbestos existing, within Asbestos Management or Refurbishment /
 Demolition Surveys, with regards to similar environments (I.E Infill panels above Fire doors).

In the event of uncertainty, or any lack of information with regards to i, ii, iii works must **not** proceed until written approval is obtained from the Estates Management (Maintenance) Team.

Any doubt at all, then contact the relevant Asbestos Manager before continuing.

- Contractors ensure that all necessary action is taken before carrying out any work.
- Any necessary University of Essex Permits and consents are raised and agreed prior to any works.

7.3 Process Flow for Staff and/or Contractor Works

Staff or Contractors who carry out work involving physical alteration, cutting or drilling into the building structure must follow the flow chart in <u>Appendix 3.</u>

Where there is **any** doubt about the possibility of the presence of asbestos containing material the Contractor must complete the Asbestos Enquiry form, (<u>Appendix 4</u>) and submit to the relevant Asbestos Manager as detailed in <u>Section 2</u> of this Asbestos Management Plan.

7.4 Availability of Asbestos Management Plan, Surveys and Plans

The Director of Maintenance, Capital and Development will ensure that full and accurate up to date copies of the Asbestos Management Plan, plans and surveys are available to all relevant staff and managers, for the Colchester Campus AND to all relevant staff, managers and contractors for the Southend and Loughton Campuses.

Electronic access to plans and surveys will be available to contractors and all relevant staff via the University of Essex Estate Management Help Desk

Section 8: Inadvertent Release of Asbestos

If material containing asbestos or suspected of containing asbestos is discovered to be damaged or disturbed by accident or during maintenance works, the following should be followed:

- **STOP** all work in progress in the area:
 - Do not attempt to clear up suspected debris;
 - Clear everyone from the affected area;
 - Close the area off.
- Prevent access to or through the area.
- Notify the relevant Asbestos Manager and Workplace Health, Safety and Wellbeing (WHSW)
 - A member of the Health and Safety team may carry out an investigation.
 - If the disturbance was by an employee of the University of Essex (or one of its subsidiaries) WHSW will advise whether this needs to be reported to the HSE under RIDDOR² and will submit the report.
 - If a contractor caused the disturbance, then their employer or the principal contractor needs to decide if it is a RIDDOR event. This decision, with justification, will need to be copied to Workplace Health, Safety and Wellbeing via safety@essex.ac.uk
- Organise, disturbed sampling air monitoring of the contaminated area, in conjunction with WHSW, in order to get an indication of the levels of possible exposure, then:
- Arrange for an environmental clean by an HSE licensed asbestos removal company, followed by four stage clearance or re-assurance air monitoring as appropriate. Action may include removal of asbestos and further air tests.
- **Retain** all documentation relevant to the work being carried out;
- Record the names and contact details of people in the area at the time of the incident and who may have been exposed to dust released from the material;
- Formally report the incident by completing the University's <u>Health and Safety Incident Form</u>, and forward it to <u>safety@essex.ac.uk</u>

² Reporting of Injuries, Diseases and Dangerous Occurrences Regulations

Section 9: Procedure in the Event of Accidental Exposure

Occupational Health (OH) has put in place a procedure and form to register the concerns of individuals who believe they may have been inadvertently exposed to asbestos whilst at the University of Essex.

- When employees are inadvertently exposed to asbestos, the incident must immediately be reported to WHSW by the line manager. An investigation of the occurrence will then be carried out by a member of the Health and Safety team alongside the manager/project officer responsible for the activity.
- OH will contact the employees who may have been exposed and request them to complete a questionnaire to register exposure to asbestos. This will need to be recorded on the employee's health record. Affected employees may be invited to attend a meeting with occupational health adviser to discuss the possible exposure and any health screening they may require.
- Refer to <u>Section 8</u> for any incidents that have resulted in accidental release or escape of asbestos fibres into the air.
- The asbestos manager will assess the requirement for RIDDOR reporting, with WHSW, based on the information collated during the investigation. The required information as detailed above will be forwarded to WHSW as soon as is practicable, to allow them to submit the RIDDOR report within the statutory timescales.
- If the responsibility for RIDDOR reporting rests with another employer, WHSW are still to be provided with the above information and advised of who is completing the RIDDOR report.

Section 10: Asbestos Surveys

Management survey

An asbestos survey locates ACM that could be damaged or disturbed by normal activities, by foreseeable maintenance, or by installing new equipment. The survey involves minor intrusion and minor asbestos disturbance to carry out materials assessment. This shows the ability of ACM, if disturbed, to release fibres into the air.

Refurbishment / Demolition survey

The Refurbishment / demolition survey is required where the premises, or part of it, need upgrading, refurbishment or demolition. A refurbishment / demolition survey aims to ensure that:

- Nobody will be harmed by work on ACM in the premises or equipment;
- Such work will be done by the right contractor in the right way

The Survey must locate and identify all ACM before any structural work begins at a stated location or on stated equipment at the premises. The Survey requires destructive inspection and asbestos disturbance. The area surveyed must be vacated and certified 'fit for reoccupation' after the survey.

Section 11: Review of Asbestos Management Plan

This Asbestos Management Plan must be reviewed at least once every 3 years or if there is any reason to doubt its validity.

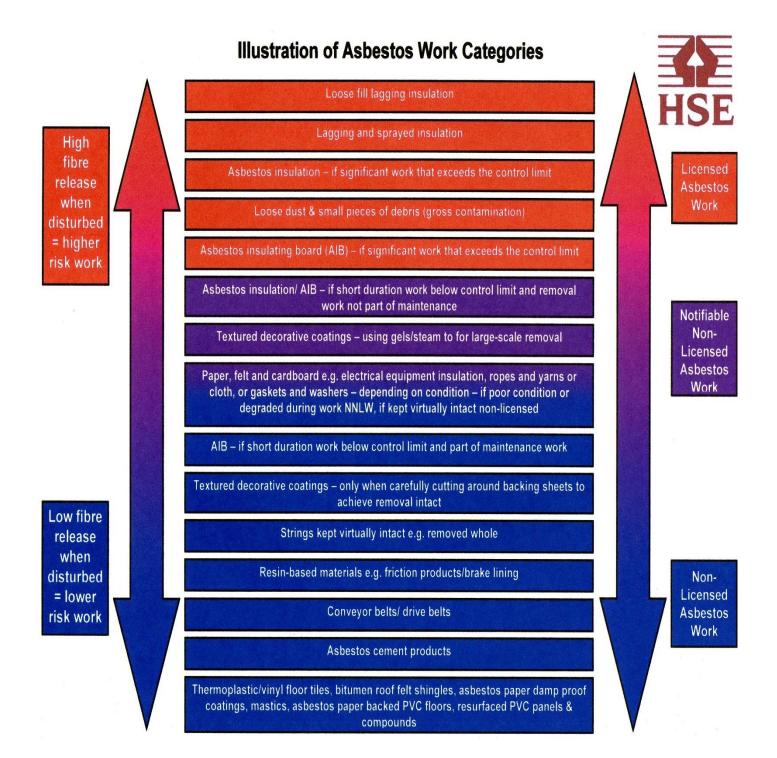
Appendices

Appendix 1 – Schedule of Asbestos Surveys

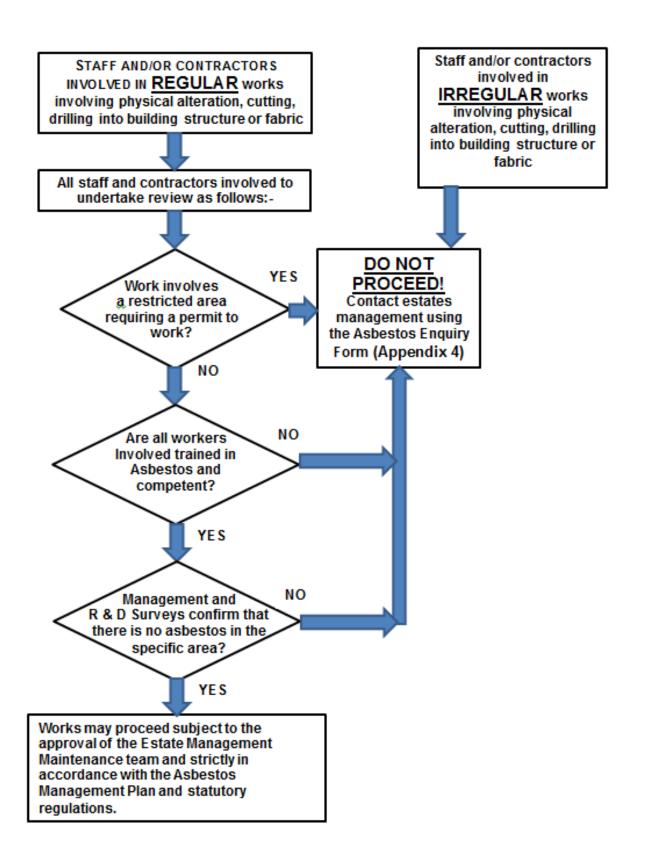
Do	cument description	Person Responsible						
Col	Colchester Campus							
1	List of Asbestos Management Surveys							
2	List of locations of asbestos containing material	Building Surveyor and						
3	Schedule of formal inspection of asbestos containing material	Safety Manager						
4	List of Refurbishment / Demolition Surveys							
Uni	iversity owned leased premises (commercial buildings)							
5	List of Asbestos Management Surveys							
6	List of locations of asbestos containing material	Head of Commercial Properties and Knowledge						
7	Schedule of formal inspection of asbestos containing material	Gateway.						
8	List of Refurbishment / Demolition Surveys							
Soi	uthend Campus							
9	List of Asbestos Management Surveys							
10	List of locations of asbestos containing material	Senior Facilities Manager						
11	Schedule of formal inspection of asbestos containing material	(Southend and Loughton)						
12	List of Refurbishment / Demolition Surveys							
Lou	Loughton Campus							
13	List of Asbestos Management Surveys							
14	List of locations of asbestos containing material	Senior Facilities Manager						
15	Schedule of formal inspection of asbestos containing material	(Southend and Loughton)						
16	List of Refurbishment / Demolition Surveys							

Hea	Health and Safety records					
17	Example of Compliance Inspection Reports for Colchester, Loughton and Southend.	Workplace Health Safety				
18	Summary Schedule of Compliance Inspection Reports undertaken for Colchester, Loughton and Southend.	and Wellbeing				
19	Log of all training by U of E staff – records to go onto iTrent	Relevant administrator.				

Appendix 2 – Licensed & Non-Licensed Works



Appendix 3 – Work Decision Flow Chart



Appendix 4 – Asbestos Enquiry Form

ASBESTOS I	ENQUIRY F	ORM		
		Name		
To: Asbestos Notes in Section 2 of the Management Planagement	Asbestos			
From:				
Date:				
	ease interrog ials:	ate the asbesto		place in the followin presence of asbest
2 days			1 week	
Room:	Asbestos	s Manager`s	Comments:	
Signed:				

Notes to users:

(Asbestos Manager)

- No work to commence without receipt of returned & signed form.
- Include plant rooms, service risers, corridors etc. where access may be required.
- If the Asbestos Manager is not available this form shall be referred to the Deputy as detailed in <u>Section 2</u> of the **Asbestos Management Plan**.