

Asbestos Management Plan

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Responsible Office/ Department:	Infrastructure / Resources & Enterprise
Responsible Committee:	Finance & General Purposes
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Introduction

This Asbestos Management Plan (AMP or 'the Plan') describes how UHI North, West and Hebrides manages the risks from asbestos containing materials (ACMs). It sets out College policy and procedures and is designed to effectively manage and minimise the asbestos-related health risk to personnel working, studying or visiting our campuses.

This policy is relevant for and applies to all at UHI North, West and Hebrides: academic and support staff, students, visitors and contractors across all NWH campuses.

Presence of Asbestos – Buildings, Plants and Equipment.

Asbestos was commonly used in the construction of buildings in the UK prior to the year 2000. Any one of our campuses that were constructed or refurbished prior to this year are at risk of containing asbestos in one of its many different possible forms.

Additionally, plant, equipment or materials (including those common to academic premises) constructed prior to 2000 are at risk of containing asbestos. Plant, equipment or materials procured from abroad are at further risk of containing asbestos as some countries were later to (or have still yet to) regulate the use of asbestos in their exports. The EU and Turkey banned the use of asbestos in construction and manufacture in Jan 2005.

For owned premises, UHI North, West and Hebrides is responsible for the management of asbestos and its associated health risks. For those buildings leased from 3rd parties, the building owner is responsible for managing the asbestos risk within the premises, though UHI North, West and Hebrides are responsible for the health and safety of all of their staff at their place of work.

It should be noted that the presence of ACM in public sector buildings is fairly common and does not immediately imply an intolerable risk. However, the presence of the ACM becomes hazardous if disturbed or damaged and therefore an active risk management approach is required to ensure that all ACMs within our properties are managed such that the risk is ALARP (As Low as is Reasonably Possible).

Asbestos Register

Management Surveys for ACMs should be carried out on all campuses, owned by UHI NWH that were constructed post 2000. The detailed survey reports will document all known or suspected instances of ACM within the property. This information, along with any subsequent ACM removal works form the basis of the Asbestos Register.

Where there are gaps in our campus survey, this shall be made clear in the Asbestos Register and in those areas, ACMs are presumed to be present until known otherwise.

Should ACM be suspected within any item, it will be added to the Register and treated as containing ACM until known otherwise.

[Asbestos Register July 2025.xlsx](#)

Operational Risks

The aim of the Asbestos Management Plan is to protect the College: its staff, students and visitors, from the risk of exposure to asbestos.

At an institutional level there are four main risks to the effective management of asbestos:

- + Failure or inadequate Asbestos Management Planning which could result in liability exposure, reputational damage or prosecution.
- + Loss of competency in team tasked with asbestos management.

- + Loss of the Asbestos Register or data contained within
- + Insufficient funding to adequately manage or mitigate the risk from ACMs.

At an operational level, there are specific risks relating to the activities of the College:

- + Risk of College staff or contractors disturbing known ACMs, particularly those that are not clearly identified, those difficult to locate, those that are naturally concealed due to the shape of the room, or those close to plant in regular use and therefore more likely to be accidentally disturbed.
- + Risk of College staff or contractors disturbing unknown ACMs, i.e., ACM in areas that have been surveyed but not successfully identified.
- + Risk of exposure to asbestos in premises not owned by the College.
- + There are also specific risks associated with research and teaching:
 - Accidentally disturbing or damaging superficial or hidden asbestos in College property.
 - Risk of exposure from plant, equipment or materials (not part of the building) that contain asbestos.

Key Regulatory Documents

ASBESTOS REGULATIONS

SI NO. 2739	Control of Asbestos Regulations 2012
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ASBESTOS – APPROVED CODES OF PRACTICE AND GUIDANCE

L143	ACoP – Work with Materials containing Asbestos (2nd Ed) (2013)
HSG 53	Respirator protective equipment at work (2013)
HSG 247	Asbestos: The Licenced Contractors guide (2006)
HSG 248	Asbestos: The analysts guide for sampling, analysis and clearance procedures (2 nd Ed) (2021)
HSG 210	Asbestos Essentials (4 th Ed) (2018)
HSG 227	A comprehensive guide to managing asbestos in premises (2002)
HSG 264	Asbestos: The Survey Guide (2 nd Ed) (2012)

HEALTH AND SAFETY – LEGISLATION (NON-COMPREHENSIVE LIST)

	The Health and Safety at Work Act 1974
SI 2014 3248	Construction (Design and Management) Regulations 2015 (CDM 2015)

HEALTH AND SAFETY – APPROVED CODES OF PRACTICE AND GUIDANCE

INDG453	Reporting accidents and incidents at work. A brief guide to the reporting of injuries, diseases and dangerous occurrences regulations 2013 (RIDDOR)
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UHI NWH Asbestos Management Plan

In the management of Asbestos Containing Materials, the college plan is to:

- + Minimise the risk of exposure to the hazards associated with asbestos to an ALARP condition.
- + Promote awareness of the Asbestos Management Plan (AMP) and the hazards associated with asbestos, through training and induction of staff and those working on behalf of the college.
- + Actively manage any known ACMs within the college premises, ensuring that risk assessments, mitigations and planned actions are accurate and up to date.
- + Create and maintain an accurate and up to date Asbestos Register.
- + Be available to provide information and advice on the management of asbestos.
- + Where known ACM is to be managed—through e.g., removal, sealing, labelling or regular or inspection—adequately resource the implementation of the appropriate measures, both financially and in team resource.
- + Continuously review the ACM to ensure that it is up to date, relevant and accurate.

The Plan complies with the Health and Safety at Work etc. Act 1974¹ and the Control of Asbestos Regulations 2012². The Plan applies to all parts of the College without exception. The Principles of the Plan also apply to all those workplaces used by College staff.

The Plan sets out the mechanism by which ACMs are managed. It includes details on how the College intends to:

- + Protect those working on the fabric of our buildings
- + Protect those working within or occupying our buildings
- + Manage the risk of hazards associated with asbestos for any works in or around areas containing ACMs
- + Identify and categorise ACMs and manage those hazards based on prioritisation and assessment of the risk that they present
- + For ACMs requiring remediation—based on an assessment of their location, condition, and risk—produce, maintain, and implement a prioritised program of remedial works. This program should include a detailed schedule of remediation activities, allocation of necessary resources, and continuous monitoring to ensure the effectiveness of the remedial actions
- + For ACMs not requiring remediation, i.e., those deemed suitable to be left in situ, it is essential to regularly monitor and maintain the condition of the known ACMs. This includes conducting periodic inspections, documenting any changes in their condition, and implementing preventive measures to ensure they remain undisturbed and in good condition.

¹ <https://www.hse.gov.uk/legislation/hswa.htm>

² <https://www.legislation.gov.uk/uksi/2012/632/contents>

Organisation and Responsibilities

Designated Roles

KEY ROLE	DESIGNATED PERSON
DUTY HOLDER	Doug Rattray (Head of Infrastructure)
COMPETENT PERSON (ASBESTOS MANAGER)	Michael Finlayson (Estates Manager)
HEALTH & SAFETY OFFICER	Jim Hutton (Health & Safety Officer)

The Duty Holder

The **Duty Holder** is the person that has clear responsibility for the overall management of asbestos risk within our estate. At UHI North, West and Hebrides the Duty Holder is the **Head of Infrastructure**, and this person will hold this responsibility for the management of asbestos in the buildings that we own.

There are a number of premises across our estate that are not owned by UHI North, West and Hebrides. In these premises, the Duty Holder shall be the building owner or a nominated agent/contractor responsible for maintaining the building.

Where there is known ACMs in any of our premises (owned or leased), the college Duty Holder is responsible for managing the risk from exposure to asbestos for our students, staff or visitors. As such, the scope of our own plan shall include owned and leased properties, i.e., the full extent of the college estate. Any 3rd party Duty Holder is required to provide details of their own asbestos management plan to the Asbestos Manager for review. Any 3rd party Asbestos Plan is expected to impose requirements that mirror or exceed the requirements placed on the management of known ACMs within our own Plan.

The Duty Holder is designated in respect to the Control of Asbestos Regulations 2012 and in their capacity in this role, they will:

1. **Establish the Asbestos Management Plan (this Document):** Prepare a written plan detailing how the risks from ACMs will be managed. This plan should include procedures for monitoring, maintenance, and safe handling of ACMs.
2. **Establish the Asbestos Register:** Prepare an asbestos register; a record of the location, type, and condition of ACMs and presumed ACMs in UHI NWH premises.
3. **Support Implementation of the AMP:** Ensure that the actions and measures outlined in the asbestos management plan are carried out. This includes assigning responsibilities and providing necessary resources.
4. **Review and Update AMP and Asbestos Register:** Regularly review and update the asbestos management plan and asbestos register to reflect any changes in the premises, ACMs, or regulations. This ensures ongoing compliance and safety.
5. **Competent Person:** Ensure that a competent person or organisation is appointed to provide technical and professional support to the Duty Holder and undertake the duties outlined below.

Competent Person (Asbestos Manager)

The **Competent Person (Asbestos Manager)** is the person that has clear responsibility for implementing the duties imposed below. In order to undertake these duties, the Competent Person needs to be suitably trained in the management of asbestos.

At UHI North, West and Hebrides the Competent Person is the **Estates Manager** as appointed by the Duty Holder. In the capacity of their role as Competent Person they will:

1. **Completion of Surveys and Assessments:** Take reasonable steps to determine the location of materials likely to contain asbestos. This includes ensuring adequate surveys and inspections are completed to identify and assess the presence and condition of ACMs.
2. **Maintain the Asbestos Register:** Ensure the asbestos register is up-to-date, accurately recording the location, type, and condition of known or presumed ACMs.
3. **Risk Assessment:** Evaluate the risk of exposure from known or presumed ACMs and prioritize actions based on the condition and potential for disturbance.
4. **Implement Actions:** Implement actions associated with known or presumed ACMs, which may include removal via licenced asbestos contractors, encapsulation or control.
5. **Monitor and Review:** Regularly inspect known or presumed ACMs to check their condition and update the asbestos register as necessary.
6. **Implement AMP:** Implement the asbestos management procedures as outlined in this document, ensuring procedures for monitoring, maintenance, and safe handling are followed.
7. **Review and Update AMP and Asbestos Register:** Contribute to the regular review and update of the AMP and asbestos register to reflect any changes in the premises, ACMs, or regulations.
8. **Training and Awareness:** Provide training and information to employees and contractors about asbestos risks and safe practices pertinent to their work. This includes employees, contractors, and emergency services.
9. **Emergency Procedures:** Establish and implement procedures for dealing with accidental disturbances of ACMs, including immediate actions to minimize exposure and contamination.
10. **Landlords Liaison:** Where there is a 3rd Party Duty Holder (e.g., in leased properties) the landlord must ensure that asbestos risks are managed effectively within their properties. This includes providing information to the Competent Person and Licenced Contractors about the presence and condition of ACM to provide assurance on their asbestos management systems and review their asbestos register and mitigations.
11. **Contractors Management:** Ensure Asbestos Works are carried out by Licensed Asbestos Contractors and that their performance is regularly monitored to ensure that they comply with legislative requirements and College Policy.

Licenced Contractors

The Competent Person (Asbestos Manager) will ensure that any removal of asbestos is carried out by Licensed Asbestos Removal Contractors. A Licenced Contractor must:

1. **Training and Competence:** Ensure that all workers are adequately trained and competent to work with asbestos. This includes understanding the risks and safe working practices.
2. **Plan of Work:** Prepare a written plan of work before starting any task that may disturb asbestos. This plan should detail the methods for safe handling, removal, and disposal of asbestos-containing materials (ACMs).
3. **Risk Assessment:** Conduct a risk assessment to identify potential hazards and implement control measures to minimize exposure to asbestos.
4. **Use of Personal Protective Equipment (PPE):** Provide and ensure the use of appropriate PPE, such as respirators and protective clothing, to protect workers from asbestos exposure.
5. **Control Measures:** Implement control measures to prevent the release of asbestos fibres, such as using wet methods, local exhaust ventilation, and enclosures.
6. **Waste Management:** Ensure that asbestos waste is properly contained, labelled, and disposed of at licensed facilities in accordance with hazardous waste regulations.
7. **Monitoring and Supervision:** Regularly monitor the work area and supervise workers to ensure compliance with the plan of work and safety procedures.
8. **Emergency Procedures:** Establish and follow emergency procedures for dealing with accidental disturbances of ACMs, including immediate actions to minimize exposure and contamination.
9. **Record Keeping:** Maintain records of all asbestos-related activities, including training, risk assessments, plans of work, and waste disposal

Estates Manager

*Note at UHI North, West and Hebrides the Estates Manager also holds the role of **Competent Person (Asbestos Manager)**, and the responsibilities of this role are explicitly detailed in Section 0.*

The Estates Manager is the person that has clear responsibility for the overall implementation of works on the college estate, ensuring that the estate is maintained in a condition that is fit for purpose and in accordance with all regulatory requirements. In the capacity of their role as Estates Manager they will ensure that:

Management of Estates Staff or Contractors

- + All Estates Staff are fully briefed in respect of the AMP and their duties as specified in the Plan.
- + All Estates Staff have received the appropriate training, including refresher training, which will enable them to discharge their duties in compliance with the AMP.
- + All contractors appointed by or managed by the Estates Manager have been fully briefed and inducted in respect of the AMP and are discharging the duties in accordance with the Plan.
- + All staff and contractors are provided with appropriate access to the data contained within the Asbestos Register.

Head of Campus Services

The Head of Campus Services will ensure that:

- + All Campus Services Staff are fully briefed in respect of the AMP and their duties as specified in the Plan.
- + All Campus Services Staff have received the appropriate training, including refresher training, which will enable them to discharge their duties in compliance with the AMP.
- + All contractors appointed by or managed by the Head of Campus Services have been fully briefed and inducted in respect of the AMP and are discharging the duties in accordance with the Plan.
- + Any personnel providing deliveries of stock or services in areas containing ACMs have been fully briefed on the controls in place in respect of the AMP and are discharging the duties in accordance with the Plan.
- + Ensuring that Information and awareness of the risks from asbestos is available to all occupants, students or visitors to the campus upon request.

Vice Principal, Resources and Finance (CFO)

The Vice Principal, Resources and Finance (CFO) will ensure that:

Enabling Resources and Organisational Arrangements

- + The required resources outlined by the Duty Holder and detailed in the AMP to discharge the duties of the college with respect to Asbestos Regulations shall be reviewed and accommodated.
- + The required funding outlined by the Duty Holder and detailed in the AMP to discharge the duties of the college with respect to Asbestos Regulations shall be reviewed and accommodated.
- + The required organisational arrangements outlined by the Duty Holder and detailed in the AMP to discharge the duties of the college with respect to Asbestos Regulations shall be reviewed and accommodated.

Audit and Review

- + The AMP and Asbestos Register will be periodically audited to ensure it is fully implemented and functioning effectively.
- + An annual review of Asbestos Register, actions, controls and performance will be undertaken. A report presentation will be made by the competent person for review by the duty holder, safety office and Vice Principal, Resources and Finance (CFO).

Safety Officer

The Safety Officer will ensure that:

Health and Safety on College Campus

- + Reporting of incidents where exposure limits exceed those laid down in the Control of Asbestos Regulations, to the Health and Safety Executive under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) and collating RISKEX records.
- + Providing health and safety advice to members of the College.
- + Reviewing with the Asbestos Duty Holder relevant regulatory requirements and best practice.
- + Investigations and assessments of exposure following serious asbestos incidents are undertaken.
- + Offering to discuss any concerns with members of the College who may have been exposed.
- + Retaining a health record for the individual for the statutory period (40 years).
- + Contacting the exposed person(s) GP in the event of the control limits being exceeded.

Contribution to the AMP

- + Reviewing risks assessments, controls and actions as outlined by the AMP.
- + Making a further assessment of health risk.
- + Following risk assessment, ACMs are assigned appropriate management options and priority actions are timetabled.
- + Regular meetings are facilitated between parties managing the risk of asbestos, e.g., the duty holder, competent person and users or occupiers of spaces impacted by the presence of ACMs.

Audit and Review

- + The AMP and Asbestos Register will be periodically audited to ensure it is fully implemented and functioning effectively.
- + An annual review of Asbestos Register, actions, controls and performance will be undertaken. A report presentation will be made by the competent person for review by the duty holder, safety office and Vice Principal, Resources and Finance (CFO).

External Contractors

External Contractors are responsible to ensure that:

- + Compliance with the AMP and relevant procedures, and where acting as sole, main or principal contractor to have a thorough understanding of these procedures.
- + Ensuring that all sub-contractors are informed of the AMP and relevant procedures and are aware of the location of ACMs within the project area.
- + Co-operating with any Licensed Asbestos Removal Contractors or associated contractors working within or adjacent the known or intended project area.
- + Ensuring that emergency measures are in place for any suspected or known exposure to ACMs and that these are in line with the AMP.

Staff, Students, Occupants and Visitors

These remaining categories of persons are subject to the following requirements:

- + All employees must follow the procedures outlined in the asbestos management plan and report any concerns or disturbances of ACMs. They should be aware of the locations of ACMs and understand the risks involve.
- + Immediately reporting to the Estate Manager / local Estates Team Lead and/or a Senior Responsible Office or site any known ACMs – in the building, plant or equipment - which are damaged or disturbed or any suspect ACMs of any condition and any defects or concerns they may have related to asbestos issues or remedial works.
- + Not drilling into or otherwise interfering with surface finishes or walls without prior permission by the Estates Team Manager.
- + Taking instruction given by the Duty Holder, Competent Person or Estates Team representative on actions or controls to be followed in areas impacted by the presence of ACMs.

Identification of ACM

Surveys for ACMs

A number of Asbestos Surveys have been completed for many but not all of the campuses in which UHI North, West and Hebrides has a presence. The aim of these surveys is, as far as reasonably practical, to locate and assess all the Asbestos Containing Materials (ACMs) present in the building and its purpose is to present the information collected in a way which allows the employer to generate an Asbestos Register and manage the risk.

Completed Asbestos Surveys are held for the following locations:

LOCATION	YEAR OF SURVEY	NOTES
THURSO ORMLIE ROAD (MAIN)	2023	Various Refurbishment Surveys
THURSO CASTLE ST (ERI)	July 2024	Asbestos Management Survey
DALE FARM		Leased property
DORNOCH CAMPUS	Feb 2024	Asbestos Management Survey
TERN HOUSE, ALNESS	Feb 2024	Asbestos Management Survey
WICK	Oct 2023	Asbestos Management Survey
FORT WILLIAM (MAIN)	June 2025	Asbestos Management Survey
FORT WILLIAM (AMC)		Constructed post 2000
AUCHTERTYRE		Constructed post 2000
STRONTIAN		Leased property
KILCHOAN		Constructed post 2000
MALLAIG		Leased property
KINLOCHLEVEN		Leased property
BROADFORD		Constructed post 2000
PORTREE		Constructed post 2000
GAIRLOCH		Leased property
ULLAPOOL		Leased property
STORNOWAY	Oct 2022	Management Asbestos Survey
TAIGH CHEARSABHAGH		Leased property
BENBECULA		Constructed post 2000
CNOC SOILLEIR		Constructed post 2000
BARRA		Constructed post 2000

All Management Asbestos Surveys, Partial Surveys, Refurbishment Surveys and records of Asbestos Sampling are stored centrally within the Estates [Internal SharePoint Site](#).

Management surveys are intended to identify ACMs that could affect the normal occupation of a building. This includes ACMs that might be disturbed not only by regular maintenance activities, but also those affected by reasonably foreseeable activities such as cabling works in risers.

Refurbishment surveys attempt to locate and describe all ACMs in a project area and are required well before any refurbishment or demolition is due. This type of survey is also required for what may appear, initially, as relatively minor work, for example, formation of a riser, or dismantling of heating plant.

Priority locations for conducting further survey works are to be identified by the Competent Person and agreed by the Duty holder. Generally, these further works would survey areas deemed most at risk due to use, occupation, age of construction and planned works.

All identified ACMs or suspected ACMs shall be recorded in the Asbestos Register for risk assessment and management.

Asbestos Register

[Asbestos Register July 2025.xlsx](#)

Contents of the Register

The Register records known and suspected ACMs in UHI North, West and Hebrides campuses. Information recorded allows objective risk assessments to be carried out and provides some detail on:

- + The location, extent, condition and labelling status for known ACMs
- + Non-ACMs where, in the normal course of the building operation, they may be confused with ACMs
- + All campuses or areas which have not been surveyed.

Where areas have not been surveyed, staff shall operate on the presumption that ACMs may be present. This implies that works should not be carried out that could damage or degrade the fabric of the building unless absence of ACM is confirmed through a local investigatory works are completed.

Drawings

Drawings may be used to illustrate the Register information; these will be colour marked up and subject to update procedures. Drawings will supplement the formal issued Register and will provide the Location Reference used within the Register.

Storage

The Asbestos Register must be stored centrally within the Estates Internal SharePoint site.

The Register stored centrally must be the most accurate and up-to-date version. No alternative versions of the register should not be stored in any other location.

Availability

The Asbestos Register is available to all who may reasonably require such information.

- + The single centrally stored Asbestos Register shall be shared and made available to the Asbestos Duty Holder, Competent Person and Safety Officer at all times.
- + Other enquirers shall be directed to the Asbestos Duty Holder to process and approve their access request.
- + Emergency Services may require to be provided access to the Asbestos Register. In these cases, the Asbestos Duty Holder, Competent Person or Safety Officer should facilitate access.

Updates

Responsibility for updating the register shall be held by the Competent Person. However, this task can be delegated to another party to be verified by the Competent Person.

Individuals, departments or organisations who wish to affect data in the Register must supply relevant information to the Competent Person.

Audit

An annual review of Asbestos Register, actions, controls and performance will be undertaken. A report presentation will be made by the competent person for review by the duty holder, safety office and Vice Principal, Resources and Finance (CFO).

Risk Assessment

Overview of Process

All ACMs in the Asbestos Register are objectively assessed by the Competent Person using a formal numerical scoring scheme. This considers aspects of materials assessment and priority assessment as described in the HSE document HSG 227³ '*A comprehensive guide to managing asbestos in premises*'.

The materials assessment considers features of the material, the priority assessment takes into account the environment in which the ACM is found and the likelihood that persons may be exposed to asbestos fibres.

The scheme considers the following parameters:

- + product type
- + condition
- + surface treatment
- + asbestos type
- + location
- + position of material, for example how accessible it is during normal building occupancy
- + susceptibility to damage
- + number of people potentially exposed
- + whether the material is subject to maintenance, refurbishment or other possible disturbance.

The Competent Person manages and keeps details on the scoring scheme and reviews the scores annually. ACMs with higher assessment scores are likely to require greater consideration regarding remediation measures than those with lower scores.

³ <https://www.hse.gov.uk/pubns/books/hsg227.htm>

Management of Asbestos Containing Materials (ACMs)

Management Actions

The Asbestos Register lists all instances of known or presumed ACMs with the College premises and for each notes the agreed Management Action - both management activities and remedial works - documented and agreed by the Duty Holder and Competent Person.

These actions contain priorities and timetables or targets for both remedial works e.g. removal works and non-remedial works e.g. training issues, survey requirements and are formally documented and monitored at regular Asbestos Progress Meetings, with detail being recorded in listings of 'Current' and 'Completed' tasks

Consideration of a timetable for any remedial works will take account of several factors including:

- + ACM risk assessment score
- + Building occupation constraints
- + Financial resources
- + Other planned building works.

Action Plan documentation is retained by the Estates Manager and is available to the Head of Infrastructure and Health and Safety Officer for review.

The annual AMP Review includes comment on the nature and progress of Action Plan items.

Management of ACMs

Management options stated within the Asbestos Register are assigned by the Competent Person and are considered the appropriate choice at the time of Register review.

The final choice of management option is taken by the Estates Manager after consideration of the assessment score and discussion with relevant parties, for example, those with information on future maintenance or refurbishment plans.

Note that in 2024/25, the nominated Competent Person and the Estates Manager function is instantiated in the same person, however, this may not be the case in future years. The Estates Manager holds ultimate decision making on whether a recommended asbestos management option is implemented on the college estate.

Long term ACM maintenance considerations, including cost, resources, potential for exposure etc, will be taken into account and opportunities taken for removing materials, particularly during periods of building closure or refurbishment.

In general ACMs with higher risk scores will be identified for remedial works, whilst those with lower scores will be retained within the management scheme for in-situ materials.

Records of decisions made, together with any discussion and rationale supporting such decision, will be kept by the Competent Person.

Inspection of ACMs

Formal re-inspections of known or suspected ACMs, will be carried out by an approved and accredited Inspection Body and will be arranged and co-ordinated by the Competent Person. Re-inspection will require checking of known ACMs against Register information.

An outline scope of work may be prepared by the Competent Person for re-inspections; this may give requirements such as:

- + Programming of the works
- + Access arrangements
- + Reporting arrangements

Re-inspection findings will be:

- + Used to update the Asbestos Register
- + Subject to formal risk assessment

The inspection period will be set by the Competent Person, taking into consideration a review of current risk assessments and previous inspection history. ACMs of higher score may be subject to more regular re-inspection than those of lower score.

The inspection period will be documented in the formal AMP Review and Action Plan.

Leaving ACMs in place

Where ACMs are in good condition, with minimal potential for fibre release, they may be left in-situ. The Estates Manager is responsible for ensuring these materials are kept in a sound condition.

Regular Inspection

ACMs left in-situ will be subject to an inspection regime. The Competent Person will determine the inspection period.

A period of between 6 and 24 months should be expected for most known ACMs and shall be dependent on the risk assessment.

Labelling of ACMs

Labelling with standard asbestos warning labels or fixing of appropriate warning signage will be carried out to all known accessible ACMs considered to be of significant risk where this is deemed to:

- + help prevent accidental damage, and
- + not cause undue concern

Labelling of lower risk materials, for example, packing to soil pipes, seals to ductwork, may not be carried out if other control mechanisms e.g. site awareness or access restrictions, are considered adequate in preventing accidental exposure.

Improvement Works

Where the ACM has minor damage, simple repair and/or sealing (encapsulation), may be appropriate. The technique and materials used will be dependent on the ACM and may include over-cladding or use of liquid applied encapsulants. These encapsulants are typically polymeric applications which dry to give a robust water-resistant surface. Repairs and any encapsulation measures will be undertaken by a Licensed Asbestos Contractor, with the local area being isolated, either by constructing an enclosure or using local exclusion techniques.

Removal of Asbestos Materials

The term 'removal' is used to describe both the removal of bulk materials and the decontamination of areas where debris or trace asbestos contamination has been identified.

Removal of ACMs is carried out as a result of:

- + Such work being stated within the Action Plan
- + Recommended works related to planned projects, or
- + Unplanned circumstances, for example:
 - o identification of high-risk ACMs
 - o damage to ACMs
 - o ACMs subject to maintenance or building works not foreseen during the AMP Review.

The option to remove ACMs will be authorised by the Head of Infrastructure and Duty Holder for aspects of on-going management of ACMs.

The Head of Infrastructure will authorise and arrange the financial spend related to the removal works, the extent of such work will be based on recommendations given by the Competent Person or appointed advisor. The responsibility for arranging and co-ordinating asbestos remedial works lies with the Estates Manager.

Removal of ACMs is an operation with inherent risks and requires effective management. Depending on location, appropriate consideration should be taken to term time occupancy, seeking to plan works during times of minimum exposure risk.

Consideration of building occupation, co-ordination with other projects, effective use of budget, etc. will be taken into account when arranging remedial works.

Remedial works planning must allow sufficient time for key stages, including:

- + Agreement of scope of works
- + Re-instatement requirements assessment
- + Contractor's quotation period
- + Method statement assessment
- + Decant arrangements
- + Statutory HSE notification
- + Occupant Liaison meetings
- + Pre-start meeting.

Completion of Asbestos Works

The Estates Manager generally provides a completion document to the Competent Person for appropriate filing, this will include:

- + a clear summary of what materials have been removed
- + project references
- + contact and documentation details
- + comment on residual asbestos risks

Remedial Works Records

These are held by the Competent Person and stored centrally within the Estates Internal SharePoint area. The Duty Holder and Competent Person should be notified of all relevant updates to those records

Records include as minimum:

- + Works specification
- + Removal method statement
- + Air monitoring reports
- + Certificate of Re-Occupation with 4 Stage Clearance documentation (where relevant)
- + Waste consignment notes

Records will be held for in perpetuity unless deemed no longer relevant or required (e.g., upon permanent vacation of building).

Disclosure of Information

Initial requests for information should be made to the UHI Data Protection Team (dataprotectionofficer@uhi.ac.uk). Any enquires received by any other member of staff should be routed this team prior to any further engagement with the enquirer.

The Data Protection Team will liaise with the Asbestos Duty Holder and Competent Person and any other relevant party in order to process the request.

Minor Works Associated with ACMs

Circumstances may arise and render it necessary for ACMs to be handled/removed other than by an HSE licensed contractor. There may also be situations where access to an asbestos work enclosure is required by another trade or UHI North, West and Hebrides employee.

These works will be of a minor nature and will be co-ordinated by the Competent Person and Estates Manager.

Such works will be extremely limited and are likely to be confined to:

- + Collection of asbestos cement (AC) debris or materials
- + Movement of electrical items (with an asbestos content)
- + Minor works involving asbestos-containing textured coating ("Artex").
- + Entry by a UHI Technical Operative, or external contractor, to assist with electrical, plumbing or other services issues. The assistance of these engineers with services isolations is increasingly relevant to reduce non-asbestos risks for asbestos operatives.

Removal of compressed asbestos fibre (CAF) gaskets from pipe flanges is NOT to be undertaken by any UHI employee.

Each type of work is to be notified in advance to the Estates Manager for review.

A record will be kept by the Competent Person of all reviews and of all related records.

Where these minor works are carried out by regular Contractors, personnel on site may be expected to attend appropriate asbestos awareness training sessions. This should be agreed between the contractor and the Estates Manager prior to any works commencing.

Where works are carried out by UHI technical operatives or inducted regular contractors the training, PPE and record requirements will be assessed by the Competent Person and the Health and Safety Officer.

Tenancies

The College manages a large property portfolio, which includes various form of tenancy agreements and leases. In all cases, unless by written exception from the Duty Holder, the premises should be managed in accordance with the AMP (this plan).

Tenants (in non-domestic premises on a management lease) should be made aware of the existence and purpose of the Asbestos Register. Should a tenant wish to review the Asbestos Register for areas in which they occupy, provision shall generally be made to satisfy this request. The enquiry should be routed through Data Protection Team in accordance with section 0.

Requirements for College leased properties

If the College is on a 'Full Repairing and Insuring' (FRI) lease, the asbestos management arrangements will remain fully within the purview of the College Estates Team and will be subject to all requirements of this Plan. In any other lease, to place responsibility for the management of asbestos on the tenant, this clause should be explicitly outlined in the lease documents.

The college does not hold any FRI leases, or leases in which asbestos management is explicitly recorded as being within the purview of the College.

In all leased premises, the asbestos management arrangements are the responsibility of the Landlord, in which case members of the College must follow these arrangements and should take direction from the Landlords nominated Asbestos Duty Holder or Competent Person.

In areas where the presence of ACMs is unknown, they shall be treated as areas un-surveyed, i.e., presence of ACMs should be suspected, and staff should operate accordingly.

In the event of an emergency, staff should evacuate the area immediately and stop any other persons from re-entering the building. Staff should never drill into or otherwise damage a wall or ceiling, as unidentified asbestos may be present. Ensure that before any proposed invasive works are undertaken, that the Estates Manager and Competent Person are consulted.

Emergency Procedures

Definition and Immediate General Actions

Emergencies are unexpected situations requiring sudden and urgent action. In the context of asbestos the immediate measures taken should prevent or minimise exposure to airborne asbestos fibre. Following this action there may be a subsequent requirement to bring in specialist contractors such as an accredited Analytical Consultancy or Licensed Contractor.

1. In general, senior staff on site should immediately take steps to evacuate the affected area and ensure that staff do not re-enter the area until the hazard has been cleared.
2. Once the area is cleared senior staff should consult with the Asbestos Duty Holder, Asbestos Competent Person or Health & Safety Officer to determine what next steps are appropriate, depending on the situation.

Further Actions to Suspected Presence of Airborne Asbestos Fibres

The following further actions may be determined by the Asbestos Duty Holder, Asbestos Competent Person or Health & Safety Officer. In general, these actions will only be undertaken by a member of staff who is trained in managing the risks of asbestos.

3. Seal off the area – close windows, doors etc so long as this is possible without causing further disturbance to the material/staying longer in the area.
4. If the emergency relates to a damaged ACM, and it is safe and appropriate to do so, cover the material with polythene or other barrier to prevent disturbance by air currents, shut down air handling units if relevant and possible.
5. Where exposure to airborne asbestos fibre is likely to have occurred it is recommended that the individual(s) ensures that a suitable note is added to their employers HR records and/or their GP Doctor's file.
6. On all occurrences, reporting of dangerous incidents must be completed in full in accordance with the following section.

Incident Reporting

Reports are to be completed by the Individual affected or an appointed representative and submitted using the on-line reporting system RISKEX.

Examples of dangerous occurrences include: a suspected asbestos-containing ceiling tile falling into the corridor; an item of equipment is opened and the presence of asbestos is suspected within; a decorator sands a wall and asbestos is suspected to be present below the surface.

In reporting "Exposure" will generally be taken to mean exposure to a known or possible level approaching or exceeding a control limit, as defined in the Control of Asbestos Regulations, 2012.

The RISKEX record should include:

- + Name of individual(s) affected
- + Date and time of incident
- + Nature of exposure (damage or work to ACM, uncontrolled release of asbestos fibre from asbestos removal enclosure etc.)
- + Location of incident
- + Type of asbestos fibre/asbestos material if known
- + Duration and level of exposure if known

- + Copies of any associated analytical records should be appended to the record following analysis
- + Details of advice etc given to individual (health risks of asbestos etc.)

The Competent Person will provide technical information, and the completed form will be sent to the Health and Safety Office and the Duty Holder for review and a further assessment of health risk. The Duty Holder will discuss any concerns with persons who may have been exposed. The form will be retained by Occupational Health for forty years and a copy given to the staff member or student with the recommendation that it be kept indefinitely.

If control limits are thought to have been exceeded, the Duty Holder should ask UHI Occupational Health will contact the GP of the exposed person.

Where the exposure relates to College employees the senior member of staff on site will record known details, these will be kept within the Asbestos Management record system with a copy sent to the Duty Holder and Health and Safety Officer.

Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)

Where exposure occurs above the control limits set in the Control of Asbestos Regulations the requirement to report the incident under RIDDOR will generally be assessed and carried out by the Health and Safety Officer.

Review of AMP

Review purpose

The Duty Holder, Competent Person and Health and Safety Officer will arrange a regular (annual) review of the AMP. The intention of the review will be to assess:

- + Management procedures and their effectiveness.
- + Effectiveness of the management plan in terms of its integration into all matters relating to the building fabric and use
- + Overall progress made against the Action Plan
- + Suitability and maintenance of communication, instruction, training of personnel, employees and contractors
- + Suitability and success of record keeping tasks

Significant findings and comments will be reported to the Duty Holder. A record of the Review will be kept by the Competent Person.

Review Timetable

A Review will be:

- + Carried out on a 12 monthly basis
- + Considered when significant events occur - for example, on completion of major asbestos removal projects, following exposure of personnel to significant airborne asbestos fibre levels, transfer or increase of premises, or if arrangements within the AMP are no longer considered to be adequate.

Review Attendees

At a minimum the review should include the following key stakeholders (note some of these roles may be instantiated under one person):

- + Head of Estates
- + Head of Infrastructure
- + Health and Safety Officer
- + Asbestos Duty Holder (if other than the above)
- + Asbestos Competent Person (if other than the above)

Draft Agenda

The Competent Person will set the Agenda and will distribute to all relevant personnel in sufficient time for data and feedback to be collated. A draft agenda is set out below for guidance:

- + The AMP
 - o Compliance with HSE and College procedures
 - o Management and Organisation structure
 - o Audits and Reports
- + The Action Plan

- + Planned Remedial Works
- + The Asbestos Register
- + General Asbestos awareness/training
- + Incidents with ACMs
- + HSE reports

Version Control and Change History

Version	Date	Approved by	Amendment(s)	Author
1	tbd			D Rattray