

The Management of Asbestos-containing Materials

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Owner	Head of Estates and Building
Approval by University Court	

1	Purpose.....	1
2	Scope	3
3	Principles.....	4
4	Procedure	5
5	Accountabilities	9
6	Policy Links.....	12
7	Potential Risks.....	12
8	Review & Monitoring.....	15
9	Implementation	16

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The Management of Asbestos-containing Materials

1 Purpose

Glasgow Caledonian University recognises its responsibilities and duties under the Health and Safety at Work etc Act 1974, to provide as healthy and safe an environment as is reasonably practicable for all staff, students, contractors, visitors and members of the public who visit the University campus.

Under the Control of Asbestos Regulations 2006 Glasgow Caledonian University recognises and accepts its duty to manage asbestos.

The purpose of this document is to manage the control of Asbestos Containing Materials and will be reviewed periodically as required by changes in the legislation, the Approved Code of Practice and HSE guidance.

The Glasgow Caledonian University's Management of Asbestos-containing Materials shall be controlled within the Facilities Department and will ensure that the Asbestos Management within the University is compliant with the current legislation and Glasgow Caledonian University's Management of Asbestos-containing Materials Policy.

Asbestos-containing materials (ACMs) were used for a wide range of construction purposes in new and refurbished buildings until 1999 when all use of asbestos was banned. This extensive use means that there are still many buildings which contain asbestos. Where asbestos materials are in good condition and unlikely to be disturbed they do not present a risk. However, where the materials are in poor condition or are disturbed or damaged, asbestos fibres are released into the air, which, if breathed in, can cause serious lung diseases, including cancers.

Workers who disturb the fabric of buildings during maintenance, refurbishment, repair, installation and related activities may be exposed to asbestos every time they unknowingly work on ACMs or carry out work without taking the correct precautions. The purpose of managing asbestos in buildings is to prevent or, where this is not reasonably practicable, minimise exposure for these groups of workers and other people in the premises. To prevent this exposure, information is needed on whether asbestos is, or is likely to be, present in the buildings, so that an assessment can be made about the risk it presents and appropriate measures put in place to manage those risks.

The Management of Asbestos-containing Materials Policy

The University's Policy conforms with the Health and Safety at Work Act 1974 and The Control of Asbestos Regulations 2006.

The Policy, Management and Procedures apply to all parts of the University without exception.

- University's policy is to prevent exposure to the hazards associated with asbestos containing materials.
- To promote awareness of the hazards of asbestos containing materials and the University Asbestos Policy, Management and Procedures through training of staff.

- To provide and maintain an Asbestos Register.
- To freely provide information on asbestos.
- To implement effective asbestos containing materials management so that appropriate measures, such as monitoring, encapsulation, sealing, labelling, inspection or removal of the material are undertaken.
- To regularly review the Management of Asbestos-containing Materials and Procedures.

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2 Scope

This Policy applies to all staff, students, contractors, visitors and members of the public who visit the University campus and in particular to the following:

A. Managers (Facilities Department) responsible for the:

Commissioning of asbestos surveys/bulk sample analysis.
Commissioning and management of specialist asbestos removal/ environmental cleaning works.
Management of the University's Asbestos Register.
Management, organisation and supervision of 'works' carried out by contractors.

B. Managers (University wide) responsible for the:

Management, organisation and supervision of 'works' carried out by general contractors.

C. University Staff:

Any persons who may come into contact with ACMs.

Periodic refresher training shall be provided to keep abreast of changes in legislation and working practices. Records of training will be kept on an FM Training database.

- Contact the Estates Manager and ensure that the University's asbestos management is adhered to, when work cannot be completed without disturbing asbestos.
- Report any defects or suspected ACMs prior to starting/continuing with work.
- Report immediately to the Estates Manager any materials suspected to contain asbestos where the materials have been disturbed or damaged, or where works are likely to be undertaken that may affect such materials.
- Make full and proper use of any control measures put in place for working with or adjacent ACMs e.g. PPE.
- Follow carefully all the procedures set out in the 'Plan of Work' for the works.
- Keep the work place clean.
- Eat and drink only in agreed locations.

3 Principles

Asbestos, a category 1 human carcinogen, is subject to a specific set of regulations, CAR 2006. These regulations cover work with asbestos, prohibitions on the importation, supply and use of asbestos, and licensing of asbestos-removal activities. Regulation 4 of CAR 2006 contains an explicit duty on the owners and occupiers of non-domestic premises, who have maintenance and repair responsibilities, to assess and manage the risks from the presence of asbestos

The risks will vary with circumstances and can arise from normal occupation of a building or from inadvertent disturbance during the repair, refurbishment and demolition of premises. The risk assessment will be used to produce a management plan which details and records what actions to take to manage and reduce the risks from asbestos.

The requirements are placed on 'duty holders', who will:

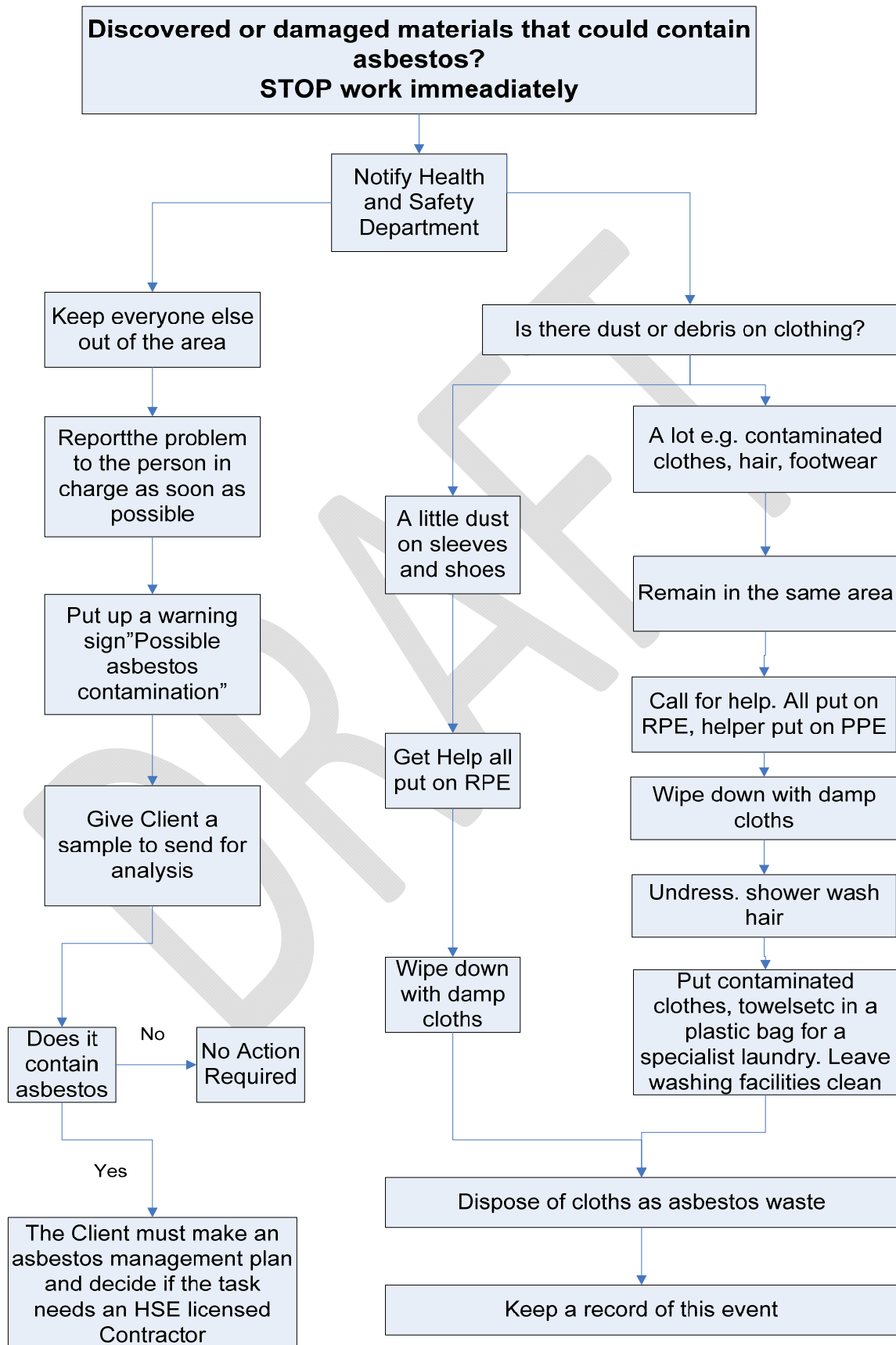
1. take reasonable steps to determine the location of materials likely to contain asbestos;
2. presume materials to contain asbestos, unless there are good reasons not to do so;
3. make and maintain a written record of the location of the ACMs and presumed ACMs;
4. assess and monitor the condition of ACMs and presumed ACMs;
5. assess the risk of exposure from ACMs and presumed ACMs and prepare a written plan of the actions and measures necessary to manage the risk (ie the management plan); and
6. take steps to see that these actions are carried out.

To manage the risk from ACMs, the duty holder will:

- a. keep and maintain an up-to-date record of the location, condition, maintenance and removal of all ACMs on the premises;
- b. repair, seal or remove ACMs if there is a risk of exposure due to their condition or location;
- c. maintain ACMs in a good state of repair and regularly monitor their condition;
- d. inform anyone who is liable to disturb the ACMs about their location and condition;
- e. have arrangements and procedures in place so that work which may disturb the ACMs complies with CAR 2006; and
- f. review the plan at regular intervals and make changes should circumstances change.

4 Procedure

Glasgow Caledonian University Facilities Department



Procedures

- Stop this work immediately
- Follow the chart above or do a risk assessment to decide who must do the work – A Licensed Contractor may be needed.
- Minimise the spread of contamination to other areas
- Keep exposures as low as you can
- Clean up the contamination

Asbestos Register

The current asbestos register was formulated in 2004. Current ACM risk assessments are based on a material assessment score as per HSG264 Asbestos: The survey guide and a priority assessment score as per HSG227 'Comprehensive guide to managing asbestos in buildings' and is compatible with latest industry standards. This enables the identification and prioritisation of management actions to identified ACMs.

Data contained within the asbestos register will be frequently reviewed and updated in line with physical alterations of the University Estate along with re-inspections of ACMs, asbestos removal, encapsulation and environmental cleaning works being carried out. The database will be regularly updated by a competent person. Information regarding ACMs and general information on management of asbestos may be obtained by contacting the Estates Help Desk on ext 3999. The Help Desk staff will engage the appropriate contact within the team who will check the register and provide appropriate information in a written or electronic report.

The Facilities Department strive to raise awareness of ACMs and encourage University staff to check the asbestos register prior to commencing any work activity. Awareness training will be provided to key personnel within the University and will ensure that asbestos is considered in all activities and that appropriate checks are made from the asbestos register.

Audit process

ACMs identified within the University asbestos register shall be periodically reviewed. The audit process shall involve a visual inspection of all ACMs listed in the asbestos register. Each material shall be re-assessed by a competent person on its condition and likelihood of disturbance. Results from the audit survey shall be fed back into the asbestos database. Where changes are identified risk assessments will be revised and priorities adjusted and appropriate management controls put in place.

Asbestos Removal and Environmental Cleaning Works

Works involving the treatment, encapsulation or removal of ACMs shall be undertaken by HSE licensed contractors. Licensed asbestos contractors engaged directly by the Facilities Department or the Principal Contractor for the removal or treatment of asbestos shall:

- Consult the Asbestos Register and survey information in the Health and Safety plan to assess the risk and ascertain the scope and extent of asbestos removal.

- Provide a 'Plan of Work' for the Project Manager/Principal Contractor as to how the asbestos shall be removed in compliance with current legislation.
- Licensable works shall be notified to the Health & Safety Executive at least 14 days prior to commencing in accordance with Regulation 9 of the Control of Asbestos Regulations 2006.
- Notify University Estates Manager when preparing the works for removal to allow independent inspection and smoke testing to be carried out.

Airborne Monitoring

An Independent Analytical company UKAS accredited to ISO 17025 and ISO 17020 (or equivalent) shall be employed to carry out these works on behalf of the University. The analyst must not be employed as a sub-contractor to the asbestos removal contractor.

Clearance Testing

All available information from the University's Asbestos Register (applicable to areas concerned) shall be made available to the independent analyst prior to commencing these works. On satisfactory completion of these works, the analyst shall produce a the four stage clearance procedures as per HSG 248 'Asbestos: The analysts' guide' to ensure that the area is safe for re-occupation. The certification will allow the University's Asbestos Register to be updated.

Reassurance Monitoring

Airborne monitoring shall be carried out in areas considered sensitive, or in situations where it is considered necessary, to provide documentary evidence that the levels of airborne respirable fibres are acceptable i.e. <0.01 f/ml. Reassurance monitoring shall be carried out at the discretion of the Estates Manager.

Personal Monitoring

Licensed contractors 'working with asbestos' shall take adequate steps to monitor the exposure of their employees to asbestos, all in accordance with current legislation.

Storage and Disposal of ACMs

During and on completion of asbestos removal and environmental cleaning works, ACMs shall be double bagged/wrapped in appropriately labelled bags and removed as it is produced. Bags shall be sealed, and cleaned prior to removal from the enclosure. Bags containing asbestos waste shall be transported along an agreed route for immediate removal from site, or safe storage within a lockable container located in an agreed position on site. Final removal and disposal of these items shall be arranged via a licensed asbestos removal contractor.

All asbestos waste generated shall be transported and disposed of strictly at a site licensed to receive it all in accordance with the Hazardous Waste Regulations 2005. The Contractor responsible for disposal of asbestos waste shall provide the University with documentary evidence of safe disposal via copies of consignment notes.

Non-Removal of Asbestos During Building Work

Where a decision is taken by the University not to remove ACMs then precautionary measures shall be put in place. This will include:

- Information regarding ACMs shall be made available to the contractor prior to the commencement of works.
- The Contractor shall provide details of the measures to be taken in order to protect the material from damage/disturbance of ACMs arising from the works.
- Routine airborne monitoring of the working area may be requested as reassurance that the work is not disturbing ACMs.
- Limitation of access controls to be put in place.
- Limitation of extent of works to be put in place.

Emergency Procedures

The following procedure should be followed whenever suspected ACMs or a disaster zone is identified:-

- Stop work immediately.
- Isolate the area, i.e. shut doors and windows etc.
- Post warning notices and inform people in the immediate area and request that everyone keep away.
- Make contact with the Facilities Helpdesk, ext 3999 and provide details of the occurrence.
- Estates Services will check register to establish whether ACMs are present.
- In circumstances where no records are available, the Estates Department shall organise for samples to be taken for analysis by a UKAS accredited testing, sampling and analysis laboratory.
- Appropriate risk assessments and control procedures shall be agreed following consultation with the University Health and Safety Advisor and implemented to avoid exposure of ACMs to building users.
- Encapsulation, treatment or removal of disturbed ACMs shall be carried out in accordance with current legislation before areas are re-occupied.
- In circumstances where a 'site' is under the control of a Principal Contractor and ACMs are discovered the Procedures contained in the Health & Safety Plan should be followed and the Project Manager and Planning Supervisor informed as soon as practical.

The following points should be noted:

- **Do not** allow works to continue on any materials, which are suspected of containing asbestos.
- If suspected ACMs have been damaged or disturbed during work(s) in progress, the materials should be left in-situ, the work(s) suspended and the area isolated pending further investigation.
- **Do not** attempt to take a sample. The actual act of sampling asbestos can expose the sampler to dangerous levels of fibres and it is possible to contaminate the surrounding area.
- Samples should **only** be taken by a UKAS accredited asbestos testing, sampling and identification laboratory.

5 Accountabilities

Roles and Responsibilities

A. Head of Estates and Buildings (Duty Holder)

- Identify and train personnel to oversee the implementation and maintenance of the Asbestos Management.
- Ensure the Estates Manager arranges sufficient and suitable training with respect to asbestos issues where appropriate;
- Ensure that the Estates Manager is advised of all new members of staff that require training, including details of any previous training.
- Ensure that all Estates' staff, contractors and consultants are fully aware of the asbestos management and reporting procedure.
- Ensure that all consultants and contractors employed by the University have trained their staff in asbestos awareness.
- Direct asbestos policy at the operational level.
- Assess recommendations put forward by the Estates Manager following regular reviews.
- Ensure that any new additions to the University's estate are surveyed and the results placed on the Asbestos database and incorporated into the Asbestos Management.
- Ensure that any buildings that are subject to demolition or major refurbishment works have a Type 3 – Fully intrusive, survey conducted on them prior to any works commencing or being tendered for.
- Initiate an investigation into any incident that involves an uncontrolled release of asbestos fibres that result in person/s being exposed to asbestos fibres, record and report findings and any recommendations to the University Health and Safety Committee .
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B. Estates Manager

- Deputise in the absence of the Head of Estates and Buildings.
- Ensure that the register of ACMs is kept up to date and shall provide a record of the location, condition, maintenance and removal for all ACMs on the University's estate.
- Make information available to those who may come into contact or disturb ACMs. Information shall be provided in a written/electronic format and shall be correct on the date it is presented.
- Ensure that prior to the commencement of any works which may have the potential to bring staff into contact with ACMs, the asbestos register should be consulted and information used within the risk assessment for the works.
- Implement and maintain an asbestos reporting system which enables internal, external consultants, and contractors to make requests for information regarding asbestos and respond to the requests by carrying out appropriate levels of investigation and provide documented response.
- Ensure arrangements are put in place so that any work which may disturb ACMs comply with current legislation.
- Ensure that necessary repairs, seal, label or removal of ACMs are carried out in accordance with current legislation and to a satisfactory standard.
- Implement and maintain a periodic monitoring system to register the condition of ACMs and reassess the risk.

- Raise awareness and understanding of asbestos with all staff.
- Inform appropriate staff and liaise with the Assistant Estates Manager in respect of asbestos related works.
- Supply information to the Estates Office Manager, to be included on the Estates web site.
- Monitor the performance of preferred contractor/s and consultants to access their compliance with statutory requirements and competence to carry out asbestos remedial works in University buildings, report and discuss deficiencies with the Head of Facilities Management and make recommendations for action.
- Review and act upon any audits carried out by either the University's Health and Safety Advisor or asbestos consultants.
- Assess, review and recommend management actions following periodic inspections, changes in regulations and / or current good practice.
- Attend the Facilities Department Health and Safety meetings and advise on asbestos related matters.
- Assist the governing bodies such as the HSE with details of asbestos management procedures where required.
- Supply all data relating to asbestos to external contractors, In-house staff and service providers.
- Process Asbestos Information Forms, providing information from the register and keeping a record of the Form and the information provided.
- Ensure that all statutory documents generated by the asbestos related work are properly completed and a record kept.
- Maintain the Estates WebPages on asbestos related information.

C. Assistant Estates Manager

- Deputise in the absence of the Estates Manager.
- Attend any relevant asbestos course identified by the Estates Manager
- Closely liaise with the Estates Manager on any issues relating to asbestos.
- Carry out or arrange a risk assessment on all areas prior to projects starting to identify any known risk from asbestos by interrogating the asbestos register.
- Stop any work and inform staff if suspected asbestos material is discovered and then duly inform the Estates Manager.
- Ensure that all consultants / contractors employed by the University have trained their staff in asbestos awareness.
- Attend any Asbestos meetings organised by the Estates Manager

D. Health & Safety Advisors

- Support the investigation into any incident that involves an uncontrolled release of asbestos fibres that result in person/s being exposed to asbestos fibres, record and report findings and any recommendations to the University Health and Safety Committee .
- Provide advice on asbestos awareness training for appropriate staff as necessary;
- The Occupational Health Adviser to implement, in conjunction with the Estates Manager (should it become necessary), for a health record and medical surveillance/screening programme approved by the HSE, in the event that person/s are exposed to asbestos fibres due to an uncontrolled escape as deemed appropriate by the University.
- Include the management of asbestos containing materials as part of the existing

E. Contractors

- Ensure that all staff under his/her control are fully aware of both the Asbestos Management, how to access the Asbestos database, plus the reporting procedure of any suspected ACMs.
- Ensure that the asbestos register is interrogated by all maintenance staff prior to them undertaking maintenance tasks; liaising with Estates Manager to implement safe systems of work to ensure that this is done.
- Ensure that the asbestos management is adhered to at all times by all staff and contractors under their control.
- Ensure that all staff under his/her control has sufficient and suitable asbestos awareness training and this is reviewed on an annual basis. Advise the Estates Manager of the proposed training requirements.
- Ensure the Estates Manager is advised of all new members of staff that require training.
- Assess areas prior to projects starting to identify any known risk from asbestos by interrogating the Asbestos Register and, if appropriate, requesting a survey, or a bulk sampling exercise, as appropriate via the Estates Manager.
- Brief staff and contractors of the location of any known asbestos affecting a project.
- Stop any works and informing staff if suspected asbestos material is discovered during the course of a project and seeking advice from the Estates Manager.
- Attend asbestos meetings as required by the Estates Manager.

F. Staff

- Adhere to the requirements of the University's Management of Asbestos-containing Materials and access the Asbestos register prior to commencing any maintenance works.
- Ensure that any work that may disturb or damage a material containing asbestos is avoided.
- Stop work and seek advice from the Estates Manager/Assistant Estates Manager if suspected asbestos material is discovered.

G. Estates Help Desk

Advise staff on the correct procedure on requesting information on Asbestos and for reporting any suspect materials.

Ensure that all staff under their control are fully aware of the Management of Asbestos-containing Materials plan.

H. Information Officer

Supply all data relating to asbestos to external contractors, In-house staff and service providers.

Process Asbestos Information Forms, providing information from the register and keeping a record of the Form and the information provided.

Ensure that all statutory documents generated by the asbestos related work are properly completed and a record kept.

Maintain the Estates WebPages on asbestos related information.

I. Heads of Schools/ University Services

Ensuring, through their School Management Groups and Health & Safety Committees, that areas under their control have in place the necessary local arrangements to protect employees and others working in or visiting the University from exposure to Asbestos.

J. Heads of School/ Directors of Research Institutes/ Heads of Service

a. Identify, with assistance and guidance from Facilities Department as appropriate, all plant/ equipment under their control containing asbestos components.

b. Ensure asbestos-containing plant/ equipment is maintained in good repair, that repairs are only carried out by competent persons and that disposal of damaged or surplus plant/ equipment is through a waste stream suitable for the disposal of the asbestos component(s), as advised by the Facilities Department.

c. Implement suitable arrangements to ensure that all staff notify the Facilities Department of any activity that requires disturbance to the fabric of the building (or has resulted in accidental disturbance), in order that the Asbestos Register may be consulted for information on the presence of any asbestos, and any necessary precautions adopted to both minimise the release of fibres and also prevent any persons being exposed to asbestos fibres.

d. Ensure that, in situations where the School or Research Institute is a tenant in buildings belonging to another body, that employees located there are aware of the Landlord's requirements in respect of the Management of Asbestos and know who to contact under circumstances where the building fabric requires to be disturbed or is accidentally disturbed.

e. Ensure that employees are aware of the need to ensure that all known potential exposures to asbestos should be reported through the accident reporting system.

6 Policy Links

Refer to the Glasgow Caledonian University Health & Safety Policy.

7 Potential Risks

Management of Asbestos

Risk assessments are carried out in two parts – Material Assessment Scores (MAS) and Priority Assessment Scores (PAS).

Material Assessment Score Algorithm.

Number scores are allocated to ACM depending on product type, extent of damage/deterioration surface treatment and asbestos type. ACMs with scores of 10 or more are regarded as high potential to release fibres if disturbed.

10+	High
7 – 9	medium potential
5 – 6	low potential
4 and less	very low potential

These scores and other recorded observations, which are perceived as being likely to affect the release of asbestos fibres, are then used to allocate a risk code, which provides some basic advice on how the ACM should be treated.

All data that has been assessed will be logged on the asbestos register with associated photographs by the Contractor and a management plan formulated and logged against the ACM. At the next inspection, the ACM is re-assessed, a new inspection date is logged and the condition is reviewed and the risk adjusted accordingly.

From the risk assessment scores frequency of inspections will be determined. It should be the case that all high risk ACM's are removed or in the instant that this is not possible that they have been encapsulated and labelled.

The contractor will provide monitoring by periodic inspections by trained in house staff or appropriate asbestos consultants. Checks depending upon risk priority, a twelve monthly check will then be carried out by licensed asbestos contractors to assess known areas in areas where risk is changed significantly.

Priority Assessment Scores (PAS) HSG 227

Assessment factor	Score	Examples of score variables
Normal occupant activity Main type of activity in area Secondary activities for area	0 1 2 3 As above	Rare disturbance activity (eg little used store room) Low disturbance activities (eg office type activity) Periodic disturbance (eg industrial or vehicular activity which may contact ACMs) High levels of disturbance, (eg fire door with asbestos insulating board sheet in constant use) As above
Likelihood of disturbance Location Accessibility Extent/amount	0 1 2 3 0 1 2 3 0 1 2 3	Outdoors Large rooms or well-ventilated areas Rooms up to 100 m ² Confined spaces Usually inaccessible or unlikely to be disturbed Occasionally likely to be disturbed Easily disturbed Routinely disturbed Small amounts or items (eg strings, gaskets) 10 m ² or 10 m pipe run. >10 m ² to ≤50 m ² or >10 m to ≤50 m pipe run >50 m ² or >50 m pipe run
Human exposure potential Number of occupants Frequency of use of area Average time area is in use	0 1 2 3 0 1 2 3 0 1 2 3	None 1 to 3 4 to 10 >10 Infrequent Monthly Weekly Daily <1 hour >1 to <3 hours >3 to <6 hours >6 hours
Maintenance activity Type of maintenance activity Frequency of maintenance activity	0 1 2 3 0 1 2 3	Minor disturbance (eg possibility of contact when gaining access) Low disturbance (eg changing light bulbs in asbestos insulating board ceiling) Medium disturbance (eg lifting one or two asbestos insulating board ceiling tiles to access a valve) High levels of disturbance (eg removing a number of asbestos insulating board ceiling tiles to replace a valve or for recabling) ACM unlikely to be disturbed for maintenance 1 per year >1 per year >1 per month

8 Review & Monitoring

This policy is not contractual and is not intended to be incorporated into individual terms and conditions of employment. All staffs are bound by the content and requirements of this policy.

Relevant Legislation, Approved Codes of Practice (ACoPs) and HSE Guidance.

This Asbestos Management has been drawn-up in accordance with, and to comply with, the following legislation.

Legislation.

- Health & Safety at Work Act 1974.
- Management of Health and Safety at Work Act 1999.
- Management of Health & Safety at Work 1999
- Control of Asbestos Regulations 2006
- Hazardous waste Regulations 2005
- Construction (Design and Management) Regulations 2007

Approved Codes of Practice (Health & Safety Commission)

- L127 Management of asbestos in non-domestic premises.
- L143 Work with materials containing asbestos.

Guidance Documents (Health & Safety Executive)

- HSG33 Health and Safety in Roof Work (First Edition)
(Covers asbestos cement roof demolition).
- HSG189/2 Working with Asbestos Cement.
- HSG210 Asbestos Essentials Task Manual (Second Edition) 2008.
- HSG213 Introduction to Asbestos Essentials (First Edition) 2001.
- HSG227 Comprehensive guide to managing asbestos in buildings 2007.
- HSG247 Asbestos: The licensed contractors' guide.
- HSG248 Asbestos: The analysts' guide.
- EH51 Respiratory equipment for use in removing asbestos.

Free Information Leaflets (Health & Safety Executive)

- Managing asbestos in Workplace Buildings (8/00)
- Working with Asbestos in Buildings (4/99)
- Em1 Asbestos Essentials 2007

9 Implementation

This Policy implementation continues to build on the procedures of the previous policy and the Asbestos Register and all other pertinent information.

Training

It is essential that as well as recognising the hazard, every effort is made to minimise/eliminate the risks to the working population by effectively controlling and managing all work where asbestos is present.

Training shall play an important role within the University Asbestos Management.

University Staff

Appropriate training shall be identified, prioritised and delivered to the following groups:

A. Managers (Facilities Department) responsible for the:

- Commissioning of asbestos surveys/bulk sample analysis.
- Commissioning and management of specialist asbestos removal/ environmental cleaning works.
- Management of the University's Asbestos Register.
- Management, organisation and supervision of 'works' carried out by contractors.

B. University Staff:

- Any persons who may come into contact with ACMs.

Periodic refresher training shall be provided to keep abreast of changes in legislation and working practices. Records of training will be kept on an FM Training database.

C. Contractors

The University shall actively encourage a selection of contractors that are able to demonstrate their competence and understanding of asbestos issues. Existing contractors shall be encouraged to attend asbestos awareness workshops to raise the profile of the risks from asbestos.