Brunel University of London Asbestos Management Policy
Policy ✓ Code of Practice… Guidance… Procedure…
Organisation-wide ✓ Local…
Approved by the University Health & Safety Committee
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The purpose of presenting this document to the University Health & Safety Committee Standard 3-year review.. Changes in practice and/or legislation.. New policy document ✓

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1. Purpose

Brunel University of London (BUL) is committed to preventing exposure to escape asbestos fibres arising from work activities under its control as far as is reasonably practicable. This policy establishes the University-wide requirements for compliance with the Control of Asbestos Regulations 2012 (CAR), including the duty to manage asbestos, and relevant duties under the Health and Safety at Work etc. Act 1974. The University Asbestos Management Plan (AMP) and associated procedures set out the arrangements by which these requirements are implemented. Compliance with the applicable requirements of this policy, the AMP and associated procedures is mandatory.

2. Scope

This policy applies to staff, students, contractors, visitors and others who may be affected by asbestos risks arising from University activities, and to premises, plant and equipment for which BUL has relevant responsibility or control. The duty to manage asbestos under CAR Regulation 4 applies

according to responsibility for maintenance or repair, including responsibilities arising from leases, contracts and actual control. Where another party is the dutyholder, BUL will cooperate and coordinate with that party, clarify respective responsibilities and obtain and share relevant asbestos information.

Buildings constructed or refurbished before 2000 will be treated as presumed to be containing asbestos unless there is reliable evidence to the contrary. This policy applies to normal occupation and maintenance, as well as any project or other work that may disturb the building fabric or asbestos-containing materials (ACMs), including refurbishment, alteration, demolition and installation.

3. Policy details

BUL will identify and assess known and presumed asbestos-containing materials (ACMs), maintain suitable asbestos information and management arrangements for premises within its responsibility, and ensure that risks are controlled. The University will maintain an asbestos register and documented management arrangements, assess the condition and priority of ACMs, arrange proportionate re-inspection, and address significant or urgent risks without undue delay. Information about the location, condition and risks of ACMs must be available to those who may disturb them. The detailed survey programme, site-specific records, risk prioritisation and inspection arrangements are specified in the AMP.

ACMs in good condition that are unlikely to be disturbed will normally be left in place and managed. Damaged, deteriorating or vulnerable ACMs, or ACMs likely to be disturbed, must be subject to appropriate risk-based controls, which may include protection, encapsulation or removal. Where suspected ACMs are discovered or asbestos is inadvertently disturbed, affected work must stop immediately, access must be controlled and the matter must be reported and managed under the AMP emergency arrangements. Work must not recommence until appropriate assessment and authorisation have been completed.

Work that may disturb building fabric, services, plant or equipment must not begin unless sufficient asbestos information has been obtained, relevant risks assessed and suitable controls established. This includes intrusive work associated with installation, cabling, maintenance, refurbishment and demolition. Management surveys support the management of ACMs during normal occupation and foreseeable maintenance; appropriate refurbishment and demolition surveys are required before relevant intrusive work where hidden ACMs may be disturbed. Survey scope must be appropriate to the proposed work. Relevant asbestos information must be communicated in sufficient time to designers, project teams, staff and contractors who need it.

The University will document its asbestos management arrangements in the AMP, including the application of dutyholder responsibilities, competent appointments, site-specific asbestos information, survey and re-inspection programmes, communication and training arrangements, emergency response, record keeping, assurance and escalation. Appendix 7 sets out asbestos-specific responsibilities at policy level; the AMP assigns detailed operational responsibilities and arrangements. Appointment of competent persons or external specialists does not transfer statutory dutyholder obligations.

All maintenance, project, refurbishment, alteration and contracted work must be commissioned, planned and managed so that asbestos risks are considered before work is authorised, throughout delivery and at handover. The applicable requirements of the University AMP and BUL Management of Works Procedure must be followed. Where construction work falls within scope, the Construction (Design and Management) Regulations 2015 also apply. Work affecting asbestos-containing components of plant or equipment must be considered alongside building-fabric risks.

Persons undertaking asbestos surveys, sampling, analysis, assessment or asbestos-related remedial work must have competence appropriate to their activities. All asbestos work must be undertaken by an HSE-licensed contractor. The University will use appropriately competent surveyors and accredited analytical services as required by applicable standards and legislation. Detailed procurement and verification arrangements are set out in the AMP.

The University will ensure that relevant staff receive suitable asbestos information, instruction and training appropriate to their responsibilities and foreseeable exposure risks, including asbestos awareness training where required. Training needs and refresher requirements will be reviewed in response to changes in role, activities, risks and knowledge. Appropriate asbestos information must also be communicated to contractors and other affected parties, with evidence of communication maintained in accordance with the AMP.

Asbestos waste must be disposed of by authorised carriers operating to relevant waste and carriage legislation. Appropriately authorised carriers and disposal facilities must be used, and required consignment and disposal records retained in accordance with the AMP.

The University will maintain records sufficient to demonstrate the effective management of asbestos risks, including surveys, registers, assessments, inspections, training, relevant communications, remedial work and waste documentation. Compliance and effectiveness will be monitored through proportionate inspections, record checks, incident review, audit and management assurance. Findings and deficiencies must be escalated and addressed through corrective action, with significant matters reported through University health and safety governance arrangements. The AMP and asbestos register must be kept current and reviewed following relevant changes or work. This policy will normally be reviewed every three years, or sooner following significant legislative, organisational or operational change, material assurance findings or an asbestos incident.

4. Responsibilities

4.1 University Council / Vice-Chancellor & Leadership Team

The University's senior leadership — including Council, the Vice-Chancellor and President, and the Executive Board/Leadership Team — hold ultimate responsibility for health and safety governance. They are accountable for setting the strategic direction of the University, ensuring it reflects statutory duties (e.g., under the Health and Safety at Work etc. Act 1974), and that adequate resources, oversight, and organisational frameworks are in place. They champion a culture of safety and continuous improvement across the institution.

4.2 Senior Managers

Senior Managers — including Directors, Associate Directors, Heads of Department, Executive Deans and equivalent roles — are responsible for translating policy into action within their areas of control.

This includes implementing health and safety arrangements, ensuring risk assessments are conducted, supervising local operational committees, and making sure staff and students understand their health and safety duties.

4.3 Line Managers

Line managers and supervisors play a critical operational role in maintaining safe environments day-to-day. They must ensure risk assessments are current and recorded, oversee induction and training, supervise safe systems of work, inspect local activities, lead incident investigations, and escalate issues appropriately. They also make sure new equipment is assessed for hazards and that relevant controls and competencies are in place.

4.4 Individual Staff and Students

All staff and students are expected to take reasonable care for their own health and safety and that of others. This includes following University policies and procedures, cooperating with safety arrangements, reporting hazards, incidents or near misses promptly, and engaging in required training and consultations. Staff must also ensure work areas and routines are safe and support continuous safety improvement.

4.5 Contractors, Visitors and Others on University Premises

Contractors, visitors, and external partners must comply with Brunel's health and safety policies while on campus. Those responsible for arranging visits must ensure contractors and visitors receive relevant safety information and understand emergency procedures and local hazards.

4.6 Competent Health & Safety Support

Brunel's Health, Safety & Environment Team (HSET) provide specialist advice, support, and training. They facilitate risk assessment guidance, promote best practice, help interpret legislation, and support organisational compliance activities. Managers and staff should seek specialist input where needed.

5. Legal and other requirements

Health and Safety at Work etc. Act 1974

Control of Asbestos Regulations 2012 (CAR)

Management of Health and Safety at Work Regulations 1999

Construction (Design and Management) Regulations 2015, where applicable

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

Hazardous Waste (England and Wales) Regulations 2005, as amended, and current Environment Agency hazardous-waste requirements

Environmental Protection Act 1990 and Waste (England and Wales) Regulations 2011, where applicable

Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations 2009, where applicable

HSE L143 Managing and working with asbestos: Control of Asbestos Regulations 2012 Approved Code of Practice and guidance

HSE HSG264 Asbestos: The survey guide

HSE HSG248 Asbestos: The analysts' guide

HSE HSG247 Asbestos: The licensed contractors' guide

BUL Asbestos Management Plan

BUL Asbestos Works Procedure

6. Appendix - Definitions

Asbestos-containing material (ACM)
Any material or article that contains asbestos.

Asbestos Management Plan (AMP)
The University management document setting out how asbestos risks are managed in premises for which the University has relevant duties. It includes the management structure and responsibilities, asbestos register and site information, condition-monitoring arrangements, information-sharing and work controls, emergency arrangements, records and review requirements.

Asbestos register
The live record of known and presumed ACMs, including relevant information about their location and condition, which must be kept up to date as circumstances change.

Dutyholder
The person or organisation with responsibility for maintenance or repair of non-domestic premises, or access to and control of those premises, to the extent defined by Regulation 4 of CAR. The identity and extent of the duty may depend on leases, contracts and actual maintenance responsibilities.

Appointed / responsible person
A competent person identified within the AMP with sufficient resources, skills, training and authority to coordinate specified elements of the University's asbestos management arrangements. Appointment does not transfer the legal dutyholder's duties.

Management survey
A survey intended to locate, as far as reasonably practicable, ACMs that could be disturbed during normal occupancy, foreseeable maintenance and installation work, and to assess their condition.

Refurbishment and demolition survey
An intrusive survey required before refurbishment or demolition work in the area affected, where necessary to locate ACMs that could be disturbed by the proposed work.

Licensable work
Work with asbestos for which an HSE licence is required under CAR.

Asbestos Works Procedure
The University operational procedure setting out how projects, maintenance and contracted works are planned, coordinated, authorised, evidenced and handed over where they may affect statutory compliance or building systems. “Management of Works” is an internal University term rather than a statutory legal term.

7. Appendix - Asbestos-specific responsibilities

This appendix supplements, and does not replace, the University-wide responsibilities in Section 4. Named appointments, building-specific dutyholder arrangements and detailed operational responsibilities are documented in the Asbestos Management Plan (AMP).

7.1 University leadership

Ensure appropriate governance, resources and oversight are in place to discharge the University’s asbestos-related legal duties and to receive assurance on significant asbestos risks.

7.2 Dutyholder(s) under CAR Regulation 4

Ensure the duty to manage asbestos is discharged for premises within the relevant maintenance or repair responsibility, including suitable assessment, management planning, information sharing and review. Dutyholder responsibilities may be shared or rest with another party according to legal and contractual arrangements.

7.3 Designated asbestos management function and appointed competent person(s)

Coordinate the asbestos management arrangements assigned through the AMP, including asbestos information, registers, surveys, condition monitoring, risk escalation and liaison with relevant parties, within the authority and resources provided. These appointments do not displace the legal dutyholder.

7.4 Senior managers, project sponsors and those commissioning work

Ensure asbestos implications are considered before relevant maintenance, installation, project or refurbishment work is commissioned or authorised; ensure adequate asbestos information and competent advice are available and that relevant AMP and Asbestos Works Procedure requirements are applied.

7.5 Line managers and supervisors

Ensure staff under their control understand and follow applicable asbestos controls, receive appropriate information and training, do not undertake unauthorised intrusive work, and report suspected ACMs or disturbance promptly.

7.6 Staff and students

Follow asbestos safety information and instructions, avoid disturbing suspected or known ACMs, stop affected activity where asbestos is suspected or disturbed, and report concerns immediately.

7.7 Contractors and external parties

Comply with applicable University asbestos controls, use the asbestos information provided, undertake only appropriately assessed and authorised work, and immediately report unexpected materials or disturbances to the appointed competent person.

7.8 Compliance Team

Provide competent advice, support and proportionate independent assurance on asbestos governance and compliance, without assuming operational responsibility for the management of premises, surveys or remedial works solely by virtue of its advisory role.