



ASBESTOS MANAGEMENT PLAN

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University Operations

Health and Safety Compliance

Campus and Collegiate Life Services | Campus Development | Chief Operating Officer
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FOREWORD

The University of Otago is committed to providing a safe and healthy environment for students, staff and visitors. While legislative compliance is imperative, the University seeks to go beyond compliance to embed health and safety into its culture and practices, to ensure an outstanding learning and working environment.

As outlined in the University Health and Safety Framework, the University will achieve its health and safety aspirations through a number of strategies. This management plan is pursuant to at least two of these strategies i.e.:

- an adherence to an overarching Health and Safety Policy and suite of supporting policy documents
- clear definitions of health and safety roles and responsibilities within the University

The Health & Safety at Work (Asbestos) Regulations 2015 (Regulations) require the University as a Person Conducting a Business or Undertaking (PCBU), to ensure asbestos is identified and indicated, and to have an Asbestos Management Plan (Plan) as defined in regulation 13 of the Regulations.

This Asbestos Management Plan recognises that asbestos is a potential risk to people's physical, emotional and mental health and well-being, and outlines how the University will reasonably practicably, eliminate such risk by outlining how the University manages asbestos.

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1. PURPOSE

The purpose of this Asbestos Management Plan is to state how the University of Otago manages asbestos.

2. SCOPE

This Management Plan applies to all areas of the University's business including its academic, research, administrative, support services, residential activities and commercial activities. It also applies to outsourced activities that support University operations and services. The Plan applies to all University of Otago owned and leased properties.

3. INTRODUCTION

Regardless of statutory requirements, the University is committed to ensuring a safe and healthy environment for everyone on campus, including all workers and visitors. This includes recognizing that asbestos is a potential risk to people's physical, emotional and mental health and well-being, and doing all the University reasonably practicably can to eliminate such risk.

This University of Otago Asbestos Management Plan (Plan) sets out how the University manages asbestos.

The University will not ask its employees to remove, encapsulate or seal asbestos and will always engage specialist qualified and, where applicable, licensed or certified contractors to do such work.

The University acknowledges that the Health & Safety at Work (Asbestos) Regulations 2015 (Regulations) require it, as a PCBU, to ensure asbestos is identified and indicated, and to have an Asbestos Management Plan (Plan) as defined in regulation 13 of the Regulations.

This Plan is readily accessible (see definitions) to workers, their representatives, other PCBUs working with asbestos, and to anyone who might come into contact with respirable asbestos fibres.

The University uses the OHS management System model (AS/NZS 4801:2001) in this Plan. This incorporates the regular evaluation and management review of this Plan to ensure continuous improvement.

4. DEFINITIONS

Approved Contractor: a contractor which/who has been approved through the University's Health & Safety Compliance process. For asbestos contractors, approval will include demonstrating that its employees have the appropriate licences to legally undertake asbestos testing and removal; such licencing to be demonstrated by their details being listed on the WorkSafe website.

Asbestos: is as defined in the Health & Safety at Work (Asbestos) Regulations 2016 (the Regulations) and includes ACM and ACD (defined below).

ACM: Asbestos containing material: any material or thing that, as part of its design, contains asbestos.

ACD: Asbestos-contaminated dust or debris: Dust or debris that has settled within a workplace, and is, or is assumed to be, contaminated with asbestos.

Asbestos contractor: any contractor contracted to undertake work involving asbestos including taking samples, setting up air monitoring, and removing asbestos.

Asbestos register: a record of the presence and location of asbestos.

Assessment/testing of samples: assessment and/or testing by a practitioner with an "asbestos assessor licence" as defined in the Health & Safety at Work (Asbestos) Regulations 2016. Laboratories must have IANZ accreditation and/or be WorkSafe approved.

CALP: Campus Asbestos Location Plan.

DHSO: Departmental Health & Safety Officer.

Ensuring: ensuring as far as is reasonably practicable.

Friable: in powder form or able to be crumbled, pulverized, or reduced to a powder by hand pressure when dry.

Health: includes physical and mental health.

Medical practitioner: as defined in section 5(1) Health Practitioners' Competence Assurance Act 2003.

PCBU: person conducting a business or undertaking.

PSD: Property Services Division.

Qualified contractor: asbestos contractor who has all necessary experience, training, certificates and licences required by the Regulations.

Readily accessible: capable of being accessed without difficulty in hard copy, electronic form, or any other form.

Sampling Contractor: a person "competent to work in an asbestos-hazard condition" who "should" have knowledge and experience of types and locations of asbestos containing material (ACM), asbestos hazards, PPE, and the safe use of sampling plant and equipment. (Quotes are from WorkSafe Asbestos Information Sheet).

University: the University of Otago.

Vault: the University's electronic Health & Safety management system.

Will: in this document, "will" means "will, as far as is reasonably practicably possible".

WorkSafe Asbestos Exposure Register: a WorkSafe managed register, which allow anyone who believes they may have been exposed to asbestos to record their potential exposure. Registration forms are available on the WorkSafe website or via the University Occupational Health Nurse.

5. IDENTIFICATION OF ASBESTOS

- a. The University will ensure it identifies asbestos that may give rise to the risk of exposure to respirable asbestos fibres.
- b. This includes arranging asbestos management surveys of buildings identified as likely to contain asbestos.
- c. Any identified potential asbestos will be tested.
- d. Asbestos test results will be recorded in a University asbestos register.
- e. Asbestos will also be indicated in a Campus Asbestos Location Plan (CALP).
- f. The register will contain Information about the location, type, volume and condition of identified asbestos (when known),
 - a. Information in the register will be readily accessible to workers, their representatives, other PCBU's working with asbestos, and to anyone who might come into contact with respirable asbestos fibres.
 - b. Requests for information in the register should be made via a request form; the University will use these forms to monitor the effectiveness of the register, and to ensure efficient accessibility.
 - c. Wherever reasonably practicably possible the University will provide relevant asbestos information to the owners of buildings leased by the University.
 - d. All identified asbestos will be labelled in accordance with the University's Identification and Labelling of Asbestos Guidelines. This is the responsibility of PSD.
 - e. Asbestos identified in portable appliances and equipment, such as heaters and laboratory equipment, will be assessed on a case-by-case basis. Either the entire appliance or equipment, or the identified asbestos removed from such items must be disposed of by qualified contractors.
 - f. If friable asbestos is identified or reasonably suspected in any area where workers or visitors are or might be:
 - i. the area will be evacuated and isolated; and
 - ii. the occupants will be promptly notified of the potential asbestos; and
 - iii. PSD will promptly arrange air testing and testing of suspected material; and
 - iv. results of any testing will be made available to occupants.

Notifications to occupants and testing results will be managed according to a Health & Safety asbestos notification processes.

6. HEALTH AND SAFETY NOTIFICATION

- a. During any asbestos-related work, the well-being of workers (including those who do any surveying and sampling) and anyone else in the vicinity will be paramount. The University and its contractors will ensure anyone who might be affected by such work will be informed about the work, including scope and time-frame; and will make information on asbestos available.
- b. If any potential asbestos is identified, this will be notified to the Head of Health & Safety Compliance, and any potentially affected personnel given any information relevant to them.

7. DECISIONS AND REASONS FOR DECISIONS ABOUT ASBESTOS MANAGEMENT: PLANNING AND MANAGEMENT MEETINGS

- a. The University will be open, transparent and act in good faith in relation to decisions, reasons for decisions, and any work involving asbestos.
- b. This includes ensuring any person who might be affected by asbestos has access to relevant information, including information about the WorkSafe Asbestos Exposure Register. Such information will be available on the University website and in hard copy upon request to the Health & Safety Compliance team.
- c. Decisions regarding asbestos management will be made by the Asbestos Planning and Management group.
- d. This group may consist of representatives from academic and non-academic staff, unions, specialist advisors as appropriate (ad hoc) including from WorkSafe and industry; external legal advisors and:
 - Chief Operating Officer (Executive Sponsor).
 - Director of PSD (Convener).
 - Director of Risk, Assurance & Compliance.
 - Head of Health & Safety Compliance or nominee.
 - PSD Resource Planner/Policy Advisor.
 - Manager- Construction Health & Safety.
 - Building Compliance Manager.
- e. Members to exercise utmost discretion and ensure privileged information remains confidential.
- f. Meetings will be held bi-monthly or as required, and notified to stakeholders.
- g. Minutes of the meetings will be available to appropriate stakeholders and as reasonably requested.

8. HOW ASBESTOS WILL BE REMOVED, ENCAPSULATED OR SEALED

- a. The University wishes to remove all asbestos however recognises that this may not be possible. Where it is not reasonably practicably possible to remove asbestos, it will be encapsulated; and where it is not reasonably practicably possible to remove or encapsulate asbestos, it will be sealed. In some instances, the asbestos may be in good condition, non-friable, and isolated from people; in such cases, the asbestos might be left as is, subject to a risk assessment.
- b. If asbestos is to be removed and the removal work cannot reasonably practicably be done immediately, the asbestos will be made safe until it can be removed.
- c. The order of asbestos removal work will be assessed taking into account the potential risk to people; medium to long-term plans for affected buildings; fire penetration requirements; seismic and fire egress; and the following indication of asbestos priorities:
 - Exposed friable asbestos.
 - Unexposed friable asbestos.
 - Asbestos in a poor condition that is likely to become friable.
 - Exposed non-friable asbestos.
 - Unexposed non-friable asbestos.
- d. Removal, encapsulation and sealing of asbestos will be done by appropriately qualified or experienced contractors; qualification to include either a Class A or Class B asbestos removal license dependent on whether the asbestos is friable (Class A) or non-friable (Class B).
- e. Any such work will be contracted and managed by PSD, unless the work is part of a Capital Project in which case, the Project Manager will act as project manager for any asbestos removal.
- f. The University requires all its asbestos contractors to provide evidence of compliance with the Regulations. Prior to asbestos work starting, contractors must provide:
 - An asbestos removal control plan, which must be kept for a minimum of two years.
 - Asbestos workers' licence numbers and other relevant qualifications and training.
 - Details of site signage.
 - A Site Specific Safety Plan (SSSP), which must include a risk analysis.
 - A copy of notification to WorkSafe where applicable (minimum five-days' notice).
 - Evidence the contractor has health-monitoring in place for its employees who might come into contact with asbestos.
 - Confirmation that anyone who might be affected by the asbestos works has been notified.
 - An undertaking that any asbestos removed and any disposable PPE will be disposed of at an approved disposal facility, and that disposal receipts will be provided to the University.
 - Details of workers' decontamination facilities.
 - Details of how any re-usable PPE will be de-contaminated.
- g. For the avoidance of doubt, no ACMs are to be recycled.

9. PROCEDURES FOR ENGAGING ASBESTOS CONTRACTORS

- a. Any asbestos contractor engaged to work for the University must be a University Health & Safety Approved Contractor.
- b. The contractors' employees must all attend a Health & Safety induction and gain a University identity card before working on campus.
- c. Details of these requirements are set out in the University Approved Contractor Policy.
- d. Where feasible, asbestos work will be subject to tendering although it is recognised that this may not always be possible due to time constraints and lack of competition in this industry.
- e. It is the joint-responsibility of PSD and the University Health & Safety Compliance team to ensure that all asbestos-related legal & University requirements (including as set out in this Plan) are met.

10. PROCEDURES FOR DETAILING ASBESTOS INCIDENTS OR EMERGENCIES

- a. All asbestos related-work, information and incidents must be recorded into the appropriate data base; such as Vault or the CALP, and be readily accessible.
- b. Any incident involving asbestos, including complaints, must be recorded in Vault and investigated by a Property Services Manager, a PSD Foreman, a DHSO, a Member of the University Health & Safety Compliance team, or other appropriately qualified person.
- c. Investigation findings must be made available (either by Vault access or by providing an electronic or a hard-copy report) to complainants and anyone involved in the incident investigated.
- d. As set out above, anyone who might have been, or believes they might have been, exposed to asbestos must be offered information about the WorkSafe Asbestos Exposure Register and offered support and assistance in completing this form. Such support and assistance may be provided by the University Occupational Health Nurse, or other suitably qualified or experienced person, as set out in the relevant health management processes.

11. THE PROVISION OF INFORMATION AND TRAINING TO EVERYONE WHO CARRIES OUT WORK INVOLVING ASBESTOS (WORKERS)

- a. Information and, if appropriate, training will be available to anyone who might, or believes they might, come into contact with asbestos.
- b. The University, in-line with WorkSafe, recognises that differing information and training may be required dependent on the potential type and level of exposure to asbestos; for example, a person working in an office with benign asbestos; those working with potentially friable asbestos.
- c. Training will be provided via the Health & Safety asbestos training programme, and by external providers as appropriate.
- d. Information will be provided through a variety of means which might include:
 - The Campus Asbestos Location Plan.
 - An asbestos register.
 - The University website.
 - Brochures and information sheets.
 - Information sessions.
 - DHSO's.
 - Supervisors and managers.
- e. Training sessions on how to recognise asbestos and safe working with asbestos will be available to all University workers who may come into contact with asbestos. Contractors to the University must provide evidence of its workers having had such training before work involving asbestos can commence.
- f. Any University training must be recorded and kept for a minimum of five years from the date a worker stops working for the University and be recorded in Vault.

12. WORKER ROLES AND RESPONSIBILITIES AND WORKING WITH OTHER PCBU'S

- a. The University, as a PCBU, acknowledges it has the primary duty of care in relation to asbestos management on campus. However, other PCBUs may have duties under the Health & Safety legislation, including Regulations. In such instances, the University will consult, co-operate, and co-ordinate with such PCBUs.
- b. This Plan acknowledges that every worker has a responsibility to do everything reasonably practicably possible to ensure their own health and that of others. This includes:
 - Attending training and education sessions on asbestos awareness and safe work methods.
 - Adhering to all reasonable University requests in regard to working with asbestos.
 - Adhering to this Plan and to any reasonable asbestos policies, procedures and guidelines.
 - Notifying the Health & Safety team or PSD of any asbestos or suspected asbestos.
- c. The University supports the involvement of worker unions in the safe management of asbestos and undertakes to supply information to such unions as appropriate and where reasonably requested. This does not replace or supersede any duties and responsibilities under the Act or Regulations.

13. ASBESTOS REGISTER AND ACCESS TO IT

- a. PSD will maintain a University asbestos register, and ensure it is kept up-to-date and readily accessible to appropriate parties.
- b. Both the register and the CALP will be reviewed prior to any demolition or refurbishment work.
- c. Relevant asbestos information will be provided to asbestos contractors.

14. HEALTH MONITORING

- a. The University acknowledges and will meet its duties under the Regulations and the Health & Safety at Work (General Risk and Workplace Management) Regulations 2015 to provide health monitoring.
- b. This will primarily include, requiring evidence from asbestos contractors that they have provided health monitoring for any of their workers who will be carrying out licenced asbestos removal work or other asbestos-related work.
- c. Any such monitoring must commence before the worker commences any such work, and must include consideration of:
 - a. The worker's demographic, medical and occupational history; and
 - b. Records of the worker's personal exposure to asbestos; and
 - c. Include a physical examination of the worker by a medical practitioner.
- d. Any health monitoring of University workers will be managed in accordance with the Health & Safety health monitoring process.

15. PROPERTY ACQUISITIONS AND NEW LEASES

- a. Whenever the University evaluates the possible acquisition of real property (by purchase, lease or any other method), and the University considers such property may contain asbestos, then the University will require the vendor or lessor (as appropriate) to provide an asbestos management survey of the property.
- b. If the survey confirms the presence of asbestos, then the applicable requirements of this Plan must be complied with before the building is occupied.

16. SYSTEMS FOR ASSESSING CONFORMANCE, EVALUATION AND REVIEW

- a. Asbestos management will be evaluated on an ongoing basis.
- b. Such evaluation will include reviewing asbestos-related information in Vault and the CALP, and from any other relevant source; such information to include asbestos testing and results, asbestos removal control plans, WorkSafe potential exposure notifications, any investigations, incidents, complaints and feedback; and any other relevant matters.
- c. Such assessment will indicate whether this Plan is achieving compliance with legal and University requirements in relation to asbestos, and inform its continuous improvement.
- d. A formal review of the Plan, and, if necessary, a revision, under regulation 14 of the Regulations will be undertaken if:
 - There is a review of a control measure.
 - Issues are identified in relation to how asbestos is removed from, or disturbed, sealed or enclosed at, the workplace.
 - The plan is no longer adequate for managing asbestos.
 - A worker's representative requests a review under Regulation 14(2).
 - Five years have passed since the last review.
- e. Stakeholders, including contractors, will be invited to contribute to the assessment.
- f. A summary of the assessment will be available on the University website, and specific information through a request to the Head of Health & Safety Compliance.

17. RELATED POLICIES, PROCEDURES AND FORMS

- a. University of Otago Health and Safety Framework.
- b. University of Otago Health and Safety Policy.
- c. Health & Safety at Work (Asbestos) Regulations 2016.
- d. Health & Safety at Work Act 2015.
- e. Health & Safety at Work (General Risks & Workplace Management) Regulations 2016.
- f. Worksafe: Interim Guidance for work involving asbestos.
- g. PSD Asbestos Discovery Guidelines.
- h. COP (Australia) How to Manage and Control Asbestos in the Workplace (Feb 2016).
- i. AS/NZ 4801:2001 Occupational H&S management systems- Specifications with guidance for use.
- j. AS/NZS ISO 31000:2009 Risk Management- Principles and guidelines.
- k. HSE (UK) Asbestos: The survey guide.
- l. Worksafe Asbestos Fact Sheets.
- m. A Comprehensive Guide to Managing Asbestos in Premises (HSE, UK).
- n. Otago University Risk Management Framework.
- o. Property Management Unit Procedures.
- p. Health & Safety health monitoring process.
- q. Health & Safety asbestos training programme.

18. FURTHER INFORMATION AND CONTACT

If you have any queries regarding the content of this Plan or need further clarification, contact the Manager – Construction Health & Safety or the Building Compliance Manager, PSD.