



# Gatwick Airport Asbestos Management Plan

## Asbestos Management Plan

### Guidance

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#### Changes to this revision:

This revision incorporates a full rewrite of GAL Asbestos Management Plan V6 and format change. As a result, it should be regarded as a new document.

#### Significant documents to be updated as a result of the changes in this revision:

GAL Asbestos Management Plan V6 to be removed from circulation

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### Overview

With construction of the current Gatwick Airport location having started in the late 50s and a majority of the buildings across the estate having been built pre-2000, asbestos containing materials (ACMs) can be found throughout. As such Gatwick Airport Ltd (GAL) has a legal duty to locate and manage all these items in accordance with the appropriate legislation.

It is therefore essential that GAL manage ACMs on the estate in a careful and considered manner. This will ensure minimal impact to airport operations whilst meeting legal requirements and maintaining a high level of Health and Safety.

It is applicable to all premises and land that fall under the Gatwick Airport byelaws, their occupants and/or those undertaking maintenance and/or construction activities to them.

This revision includes updates recommended within the Asbestos Management Systems audit undertaken by Salbrook Vance Consultants Ref: 20000-XX-H-XXX-REP-010002

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## 1. Asbestos Management Plan

### 1.1 Introduction

Control of Asbestos Regulation 4 requires that reasonable steps are put in place to manage the risk posed by the presence of asbestos containing materials in non-domestic premises. Those responsible for managing these risks are termed "Duty Holders". The broad requirements on duty holders are to:

- Take reasonable steps to determine the location of materials likely to contain asbestos
- Presume materials contain asbestos, unless there are good reasons not to do so
- Establish and maintain a written record of the location of the asbestos and presumed asbestos containing materials
- Monitor the condition of asbestos and presumed asbestos containing materials
- Assess the presence and the risk of exposure to asbestos and presumed asbestos materials and document the actions necessary to manage the risk.
- Take steps to see that the actions above are carried out.

To manage the risk from asbestos-containing materials there is a requirement to:

- Keep and maintain an up-to-date record of the location, condition, maintenance, and removal of all asbestos-containing materials (ACMs) on the premises
- Repair, encapsulate or remove if there is a risk of exposure due to an ACMs condition or location
- Maintain ACMs in a good state of repair and regularly monitor the condition
- Inform anyone who is likely to disturb asbestos about the location and condition of the material
- Have arrangements and procedures in place, so that work which may disturb the material complies with Control of Asbestos Regulations 2012
- Review the plan at regular intervals and make changes to the plan and arrangements if circumstances change.

This Asbestos Management Plan (AMP) outlines how Gatwick Airport Ltd manages the risks from asbestos and asbestos containing materials to ensure compliance with the legislative requirements whilst occupying and/or working on the Gatwick Airport estate.

### 1.2 Policy

Gatwick Airport Ltd (GAL) is legally required to maintain clear and robust controls surrounding the risks associated with the presence of asbestos containing materials.

GAL will achieve this through the following;

- Develop, implement, and review an effective asbestos management strategy so that appropriate measures, such as encapsulation, labelling, inspection or removal of asbestos containing materials are undertaken.
- Prevent exposure to the hazards associated with asbestos.
- Promote awareness of the management of asbestos procedures and the hazards of asbestos through effective training and induction of those working for and on behalf of Gatwick Airport.
- Provide and maintain comprehensible information on the location of asbestos containing materials for all relevant parties that require it.
- Hold regular meetings with key staff and groups to increase awareness of the management asbestos and related issues.
- Provide information and advice on asbestos related topics.
- Regularly review the management of asbestos policy, plan and procedures.

## 1.3 Roles and Responsibilities

This section outlines the roles and responsibilities for the Management of Asbestos on the Gatwick Airport estate. This list is not exhaustive and additional responsibilities may be detailed throughout the Management of Asbestos documentation, Legislation and Guidance.

**A copy of the GAL asbestos management hierarchy can be found in Appendix A**

### 1.3.1 All staff, occupants, and visitors

- Immediately reporting any known ACMs – in the building, plant or equipment - which are damaged or disturbed or any suspected ACMs of any condition and any defects or concerns they may have related to asbestos issues or remedial works.
- Undertaking GAL induction training, as required
- Attending Asbestos Awareness training course when so requested.
- Not carry out any activities likely to disturb the fabric, finishes or services of any building or structure, including underground services without first consulting the Asbestos Information Database.
- Comply with the Asbestos Management Plan and related procedures.

### 1.3.2 Main Duty Holder – GAL Chief Executive Officer

- The main duty holder carries overall responsibility and control for providing adequate resources, proportionate to the risks associated with exposure to asbestos containing materials and that they are managed appropriately.

### 1.3.3 Responsible Person (Duty Holder) – GAL Head of Engineering

- This role carries the responsibility of appointing a competent person to provide technical and professional support and advice to Gatwick Airport Ltd
- Ensure that the Appointed Competent Person has adequate time and resources to complete the operational management of asbestos.

### 1.3.4 Appointed Competent Person – GAL Asbestos Co-ordinator

- Updating the Asbestos Information Database
- Updating relevant GAL asbestos related drawings
- Ensuring that all statutory documents generated by asbestos management works are properly completed and a record kept
- Keeping detailed project records relating to asbestos remedial or investigative works
- Reviewing, with key members of staff, proposed regulatory changes and current standards of good practice.
- Providing expert advice on ACMs and their treatment to those with responsibility under this AMP
- Participating in the organisation and delivery of asbestos awareness presentations
- Attending project meetings as required
- Maintaining regular dialogue with the EHS team including reports on visits and actions by the HSE, local authority environmental health and similar bodies
- Providing the HSE and similar bodies with details of asbestos management procedures and projects where relevant.
- Providing regular reports to Senior Engineering Managers, Head of Engineering, Commercial Senior Facilities Manager and MCR/ESHOR as required
- Maintaining and monitoring a list of asbestos management service providers approved for use on GAL sites
- Collating asbestos related pre-construction information
- Informing the Project Manager(s) of asbestos remedial works implications
- Assessing and recommending the appropriate level of analytical support and attendance

- Reviewing asbestos remediation and survey method statements and discussing amendments with Contractor's Site Supervisor and Senior Manager (\*NB there is no current provision for this within P2W so it will need to be carried out manually with copies of RAMS forwarded to the GAL Asbestos Coordinator)
- Ensuring site works comply with relevant GAL requirements
- Monitoring Asbestos Contractors to assess their compliance with statutory and GAL requirements, reporting and discussing deficiencies with the Head of Engineering and EHS.
- Stopping work where an Asbestos Contractor does not perform to the required health and safety standards, or where his actions appear likely to result in a breach of Health and Safety or GAL standards
- Assessing requirements as required, related to relevant air monitoring strategies
- Carrying out appropriate level of investigation or similar in response to an enquiry or identification of previously unknown asbestos item, and, if required, providing a documented report
- Identifying ACMs as required, undertaking formal risk assessment, and updating the Asbestos Information Database
- Organising a regular audit of the Asbestos Information Database
- Assessing, reviewing, and recommending management actions considering inspection findings and changes in Regulations or current good practice
- Reviewing and amending, where necessary, standards of works detailed in the GAL procedures for works with ACMs
- Organising a regular inspection of ACMs
- Controlling access to contaminated areas in conjunction with the EOM
- Recommending and specifying programmes of work for asbestos management specific projects
- Investigating asbestos related incidents and near misses in conjunction with the EHS Team.
- Producing and retaining a written assessment of reported exposures to include:
  - Names of individuals potentially exposed and the estimated exposure times.
  - Type(s) of asbestos present.
  - Levels of airborne fibre.
- If the control limits specified in the Control of Asbestos Regulations have been exceeded, forwarding the assessment to GAL EHS.
- Ensuring there are appropriate emergency procedures in place and reviewing these annually, and after an incident.
- Any other relevant task required for the management of asbestos across the Gatwick estate in line with regulation, guidance, and GAL procedures.
- Organising and chairing the Asbestos Steering Group meetings

#### **1.3.5 GAL EHS Team**

- Support the GAL Asbestos Coordinator in delivery and compliance of the Asbestos Management Plan and Management of Asbestos procedures and associated legislation.
- Working with the Asbestos Coordinator to investigate and assess exposure following asbestos related incidents.
- Reporting 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 Dangerous Occurrence Forms.
- Providing health and safety advice
- Reviewing, with the GAL Asbestos Coordinator, relevant regulatory requirements and best practice.

#### **1.3.6 GAL Occupational Health**

- Reviewing asbestos exposure assessments provided by the GAL Asbestos Coordinator.
- Making a further assessment of health risk, as required.

- Offering to discuss any concerns with GAL employees who may have been exposed to uncontrolled asbestos fibre release.
- Retaining copies of asbestos exposure related health records for the statutory period (40 years) where the exposure is shown to be above the control limit.

### 1.3.7 GAL Project Managers

For this document a project manager is defined as any person organising and co-ordinating works. The Project Manager is responsible for ensuring that:

- The necessary requirements for the safe management of ACMs are fully identified and incorporated into any design or specification
- All appropriate actions within the AMP and current management of asbestos procedures are implemented.
- All relevant members of the project team are fully briefed in respect of the AMP and their duties as specified in any management of asbestos procedures and have the necessary skills to discharge their responsibilities.
- That relevant members of the project team are aware of the Asbestos Information Database and the routes by which asbestos information can be obtained.
- Project changes are promptly reviewed in relation to asbestos information, for example where extension of project area, or changes to M&E installations occur. Actual reviews may fall within the remit of other project team members, including those with responsibilities under the Construction (Design and Management) Regulations 2015.
- Any necessary works use the management service provided by GAL Asbestos Coordinator
- The GAL Asbestos Coordinator and relevant asset manager(s) are informed of all relevant project information.
- All project personnel are informed of the location of any known ACMs affecting the project.
- Works are halted, in line with the GAL Emergency Plan (**Appendix F**), if suspected ACMs are discovered during the works and further advice is sought from the GAL Asbestos Coordinator
- All Project management personnel are fully aware of emergency procedures in the event of an asbestos related incident.
- Asbestos related health and safety aspects of the project are monitored – with relevant persons informed of potential or actual asbestos problems.
- Making local arrangements with building users and service providers to facilitate the asbestos works
- Organising where appropriate an asbestos contract pre-start meeting to agree the Plan of Works, attended generally by the GAL Asbestos Coordinator, Contractor and Analyst

### 1.3.8 GAL Engineering Operations Managers (EOM)

- Assist with the facilitation of the emergency procedure, providing location and logistical advice
- Assisting with the control of access to contaminated areas

### 1.3.9 GAL Engineering Managers

- Contacting the GAL Asbestos Coordinator regarding any work to be undertaken which may involve ACMs
- Locations under the control of Engineering e.g., plant rooms, roofs, tunnels, and risers, have been surveyed for the presence of asbestos and where appropriate ACMs have been removed or encapsulated and have warning signage.
- All staff and contractors are provided with appropriate access to the data contained within the Asbestos Information Database
- Understanding the asbestos-related risks in their department (including where identified accessible, easily damaged asbestos is located) or arising from departmental activities.
- Ensuring vulnerable asbestos items are inspected routinely (as well as during re-inspections undertaken by the Asbestos Coordinator); and that such asbestos is removed as soon as possible.
- Implementing any measures deemed necessary by the GAL Asbestos Coordinator.
- Undertaking the responsibilities of the Project Manager (section 1.3.7) when appropriate

### 1.3.10 GAL Property Team

- Provide relevant asbestos information to the occupants of the buildings and/or areas they manage and detailing their responsibilities under legislation.
- Knowing where identified asbestos is located within the buildings they manage so they can monitor its condition (in addition to checks conducted by or on behalf of the GAL Asbestos Coordinator).
- Reporting any changes in condition of ACMs within the buildings and/or areas they manage to the GAL Asbestos Coordinator
- Providing information from the Asbestos Information Database to relevant persons when requested.
- Being familiar with, participating in and helping to coordinate asbestos emergency procedures.
- Liaising with asbestos management service providers as and when necessary.

### 1.3.11 GAL Retail Team

- Working with the GAL Asbestos Coordinator to provide asbestos information to concessionaires, detailing the location of any ACMs within the retail unit(s) and/or stock room(s) and their responsibilities under legislation.
- Acting as liaison to facilitate access to retail units and stock rooms for Asbestos Management Contractors as required.
- Assist the GAL Asbestos Coordinator in discharging their duties.
- Undertake their duties as described within the Retail Concession Agreement.

### 1.3.12 Asbestos Survey Contractors

Further details can be found in the specific contractor guidance for this role.

- Maintaining UKAS accreditation relevant to instructed tasks.
- Carry out asbestos surveys, sampling, and investigations, to capture all ACMs on the Gatwick Airport estate as fully as reasonably practicable in line with GAL requirements and guidance.
- Provide effective implementation of client programmes and projects related to asbestos surveying, sampling, and investigation.
- The application and completion of GAL specified work requests, relevant to the survey, sampling, or investigation in accordance with 20000-XX-Q-XXX-SOP-000008 - Permit to Work System
- Issuing survey, sampling, and investigation reports, including plans/drawings and material test certificates via the Engineering Document Management System (EDMS – currently Meridian) in the agreed format.
- Ensuring that survey data is comprehensible and complete.
- Liaising with GAL and building occupants to develop priority assessments when requested, considering occupation, likelihood of disturbance, exposure potential and maintenance.

### 1.3.13 Air Monitoring Contractors

Further details can be found in the specific contractor guidance for this role.

- Maintaining UKAS accreditation relevant to instructed tasks
- Providing pro-active support to GAL and its contractors, but to a level which would not fall within the HSE requirement for a supervisory license
- When requested;
  - Reviewing and commenting on asbestos works specifications and, prior to start of the works, on the Contractors Plan of Work
  - Providing quotations which reflect the anticipated project site and analytical requirements
  - Attending meetings, including but not restricted to, Pre-start, Project Progress and Handover Meetings.
- The application and completion of GAL specified work requests, relevant to the air monitoring task in accordance with 20000-XX-Q-XXX-SOP-000008 - Permit to Work System
- Carrying out analytical works and inspections in line with GAL requirements. Where site conditions alter, and the Project Manager is not immediately available, the Analyst will adjust the level of testing and inspection to ensure that all information relevant to the continued health and safety of the Contractor and building occupants is obtained



- Reporting to the GAL Asbestos Coordinator any defects or non-compliances relating to the Asbestos Removal Contractors performance, including suitability of the work areas, adherence to the Plan of Work, Statutory Instruments and AMP. Where the GAL Asbestos Coordinator is not immediately available the Analyst is authorised to take any measures necessary to ensure the health and safety of the Contractor and building occupants
- Checking areas on completion of asbestos remedial works to ensure that the Contractor has completed their scope of works and all affected areas have been left in a satisfactory condition
- Maintaining regular contact with the Project Manager and Asbestos Coordinator regarding progress of site works
- Reporting to the Project Manager and/or GAL Asbestos Coordinator any aspects of asbestos management encountered on site which could give rise to health risks, including but not limited to, enclosure breaches, static air samples that exceed the clearance indicator and personal monitoring that exceeds the control limit.
- Issuing formal Reports, including 4 Stage Clearance and Certificate of Re-Occupation, to the GAL Project Manager and Asbestos Coordinator on completion of site works by both email and EDMS.

#### 1.3.14 Asbestos Removal Contractors

Further details can be found in the specific contractor guidance for this role.

- Complying with current legislation, associated Approved Codes of Practice and Guidance and the GAL AMP and Management of Asbestos procedures.
- Attending site to assess and prepare quotations against asbestos management works specifications
- Providing a Plan of Work to the Project Manager and GAL Asbestos Coordinator. This to include details of project resources and timetable and an emergency procedure in line with GAL standards
- Providing Statutory Notice to the Statutory Authority prior to commencing asbestos remediation works, or, by agreement and at the request of the GAL Asbestos Coordinator, applying for a waiver from the minimum notice
- Attending the asbestos contract pre-Start meeting, Project Progress Meetings, and handover meeting as required
- Complying with all reasonable requests from the Project Manager
- Complying with 20000-XX-Q-XXX-SOP-000008 - Permit to Work System
- Complying with accident and incident investigations
- Liaising with the other asbestos management suppliers to ensure the satisfactory progress of the works
- Providing copies of notification and consignment notes and other relevant documentation via EDMS to the Project Manager and GAL Asbestos Coordinator.
- Providing the Project Manager and GAL Asbestos Coordinator with an Asbestos Works Completion statement via EDMS
- Ensuring they, their staff and any sub-contractors are competent in their allotted tasks, attend GAL induction training and asbestos toolbox talks if relevant.

#### 1.3.15 Contractors

- Ensuring that they respond to, and maintain, all communications with their Project Manager.
- Compliance with the GAL Asbestos Management Plan and all relevant procedures and legislation, and when acting as sole, main, or principal contractor to have a thorough understanding of these.
- 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 to 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 GAL procedures.
- Where necessary, undertaking a robust Asbestos specific training programme appropriate to their works which, as a minimum, should include Asbestos Awareness.

- Undertake the GAL Induction which will highlight the asbestos management plan and procedures.

#### 1.3.16 Tenants and Concessionaires

- Maintain asbestos records, where required, in accordance with current legislation
- Ensuring cooperation with GAL and its asbestos management service providers to meet its duties and responsibilities under all relevant legislation.
- Adhere to the relevant processes and procedures as set out in their agreement, contract, licence, or lease.

## 1.4 Training

### 1.4.1 Overview

Regulation 10 of Control of Asbestos Regulations 2012 relates to Information, instruction, and training. This regulation requires employers to make sure that anyone liable to disturb asbestos during their work, or who supervises such employees, receives the correct level of information, instruction, and training to enable them to carry out their work safely and competently and without risk to themselves or others.

### 1.4.2 GAL Induction

Prior to work commencing, staff and contractors must receive the GAL induction which includes a health and safety video and briefing. This can be arranged via AirDAT ([www.airdat.org](http://www.airdat.org)). The induction is aimed at giving staff and contractors an insight into the safety requirements and procedures for working at the airport and needs to be renewed every year

### 1.4.3 Asbestos Awareness

Asbestos Awareness should be undertaken by GAL employees and contractors whose work could foreseeably disturb the fabric of a building and expose them to asbestos or who supervise or influence the work and should be decided on a case-by-case basis dependant on the specific role. The GAL Asbestos Awareness course can be accessed via AirDAT ([www.airdat.org](http://www.airdat.org)).

On successful completion, participants should:

- Have an increased awareness of the nature and properties of asbestos and its effects on health, including the increased risk of lung cancer for those who smoke;
- Be familiar with the types, uses and likely locations of asbestos at Gatwick Airport
- Know how to avoid the risks from asbestos by understanding;
- Know where to obtain information on ACM locations prior to commencing work;
- What to do if suspicious materials are found;
- How to use appropriate workplace precautions, including the risk assessment process, or seek advice on workplace precautions, in respect of the risks of asbestos;
- Undertake work activities in a safe manner and without risk to themselves or others.
- Have an awareness of the key aspects of the asbestos regulations and how they fit into the broader context of health and safety legislation.
- Be aware of the procedures to be followed when coming into unintentional contact with ACMs and an understanding of the appropriate emergency arrangements.

### 1.4.4 Additional Training

It is essential that anyone who may disturb asbestos, either by themselves or those who supervise and/or allow access to employees or contractors, has the appropriate level of training. This will reduce the risk of accidental exposure to asbestos fibres to themselves, colleagues, or members of the public.

Personnel performing or managing tasks which have the potential to cause significant asbestos impacts will be competent based on appropriate education, training, and experience.

GAL staff and its contractors will undertake a robust Asbestos specific training programme appropriate to their role and works. The table in **Appendix D** shows an independent training needs analysis of suggested asbestos management related training.

## 1.5 Asbestos Information Database

Due to the complex nature of the estate and the way GAL currently stores its asbestos register, information on the location of all identified and presumed asbestos containing materials, and non-accessed areas can be found in the Asbestos Information Database which is held centrally by GAL and controlled by the GAL Asbestos Coordinator.

The GAL Asbestos Coordinator will maintain information and drawings in electronic form, including any survey findings, remediation measures and agreed actions.

GAL will control all asbestos documentation through appropriate systems to ensure that:

- They can be located.
- They are periodically reviewed, revised as necessary and approved for adequacy by competent personnel.
- The current versions of relevant documents are available for all locations where there is the potential for exposure.
- Obsolete documents are promptly removed from all points of issue and points of use, or otherwise assured against unintended use.
- Any obsolete documents retained for legal and/or knowledge preservation purposes are suitably identified.
- All documentation will be legible, dated (with dates of revision) and readily identifiable, maintained in an orderly manner and retained for 40 years. Procedures and responsibilities will be established and maintained concerning the creation and modification of the various types of document in line with 20000-XX-Q-XXX-STD-000033 – Document Control

Anyone requiring information on the location and condition of ACMs on the Gatwick estate, outside of the Asbestos Works Procedure, should submit their request to the GAL Asbestos Coordinator using the Asbestos Request for Information (RFI) form held on Airspace. A copy of this form can be found in **Appendix D**

## 1.6 Surveys

NB – GAL understands that the current guidance within HSG264 is currently unclear regarding asbestos survey types and that there has been much debate around the delivery and terminology of asbestos survey reports. As such GAL seeks to provide clarity for its Contractors and Staff. The GAL Asbestos Coordinator has taken the stance that it recognises 4 types of asbestos survey to be carried out on the built environment – Management, Reinspection, Refurbishment and finally Demolition, the definitions of which are below. If any further information regarding this decision is required, please contact the GAL Asbestos Coordinator.

*Asbestos in Soils and Construction & Demolition Materials Investigations will follow the appropriate GAL Site Investigation standard, CL:aire CAR-SOIL™ and CIRIA guidance.*

All buildings and structures constructed pre-2000, or if the age of the building is indeterminate, will require an asbestos survey as detailed below;

### 1.6.1 Management Surveys

Management surveys are intended to identify ACMs that could affect the normal occupation of a building or area. This includes ACMs that might be disturbed not only by regular maintenance activities, but also those affected by any reasonably foreseeable activities. The requirement for management surveys will be reviewed annually or where there have been significant changes to the internal layout of a building or structure.

### 1.6.2 Refurbishment Surveys

Refurbishment of a location or building will require specific investigations as guided by the project team with the survey proportional to planned scope of works, which may be anything from a 'light touch' to complete remodelling. The survey will be targeted and intrusive, and limited to distinct, well defined, areas and aspects of a building or structure.

### 1.6.3 Demolition Surveys

Demolition or dismantling of a building or structure requires that the survey is full and indiscriminate and that all aspects must be assessed to determine the presence of ACMs. The survey will be destructive and must allow full intrusive investigation throughout.

### 1.6.4 Reinspections

All areas where previous surveys have located or presumed asbestos containing materials will be inspected annually to determine the condition of the ACMs. Material and priority assessments will be updated accordingly along with the Asbestos Information Database.

These inspections will be carried out in line with the planned maintenance model set up in the GAL CMMS (Ultimo) and carried out by appropriately trained staff.

Reinspections may be brought forward on the instruction of the GAL Asbestos Coordinator in the following circumstances;

- Changes in building use
- Changes in occupancy
- Changes in access
- Ahead of intrusive maintenance or refurbishment works

### 1.6.5 Priority Assessments

Priority Assessments will be undertaken by a competent GAL member of staff in conjunction with the findings of management and reinspection surveys and reviewed by the GAL Asbestos Coordinator to formulate an asbestos remediation programme. Details of these assessments will be held in the Asbestos Information Database.

## 1.7 ACM Management Options

### 1.7.1 Labelling and Signage

Labelling of asbestos can be emotive and needs to be handled sensitively to avoid unnecessary concerns, especially in public and passenger areas. Conversely, asbestos labelling needs to be prominent enough to warn anyone who may disturb it.

Labels are in themselves vulnerable to disturbance and/or removal. Labels must therefore be managed together with the asbestos containing materials they are identifying. Ensuring the labelling strategy is implemented will form part of the reinspections.

Labelling must not be considered as a primary way of identifying known of ACMs and the absence of labels should not be considered an absence of ACMs.

Any damaged, missing or redundant labels must be reported to the GAL Asbestos Coordinator.

Examples of the labels and signage used at Gatwick Airport can be found in **Appendix F**

### 1.7.2 Enclose, Encapsulate and Repair

Where ACMs are to be managed in situ a 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, such as Indenden ET150. 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, in suitably controlled conditions.

### 1.7.3 Restrict Access

Locations where ACMs are damaged or there are uncontained loose fibres, access will be restricted to all but essential personnel until such time as the ACMs can be enclosed, encapsulated, repaired, or removed.

In most instances this will be done by way of securing the location, either with an asbestos padlock (identified by its blue colour) or by placing restrictions within the ASSA Abloy Cliq 2 cylinder profile controlled by the Engineering Control Centre accompanied by temporary signage.

Access to all restricted locations must be approved by the GAL Asbestos Coordinator.

A list of all restricted locations can be obtained from the GAL Asbestos Coordinator.

#### 1.7.4 Removal

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

Removal of ACMs is carried out because of:

- Such work being stated within the annual review
- Recommended works related to planned projects, or
- Unplanned circumstances, e.g. identification of damaged or high-risk ACMs
- ACMs subject to maintenance or building works

The option to remove ACMs will be authorised by the Senior Commercial Facilities Manager for all Property areas, GAL Asbestos Coordinator for all other aspects of ongoing management of ACMs and the Project Manager for any specific building or project works, in line with the GAL Management of Asbestos Policy.

#### 1.7.5 Asbestos Contaminated Land

The management and removal of Asbestos in Soils and Construction & Demolition Materials will follow GAL/PRO/ENV/22 – Contaminated Land, CL:aire CAR-SOIL™ and CIRIA guidance.

## 1.8 Emergency Plan

In line with the Control of Asbestos Regulations 2012, Regulation 15, Gatwick Airport must have an emergency procedure for asbestos related incidents. The GAL Asbestos Emergency Plan flow chart can be found in **Appendix F**

All Asbestos related near misses and incidents must be reported in PRIME.

## 1.9 Asbestos Exposure Reporting

As per GAL EHS incident reporting procedure, where potential exposure to asbestos has occurred, it will be recorded and investigated in Prime. It is then the responsibility of the employer to retain appropriate records of individual exposure in line with the relevant company policy and/or procedure.

Where individuals are concerned about potential health risks and wish to report the potential exposure to their GP, a template form to assist with this can be requested from the GAL Asbestos Coordinator.

Records of potential exposure to GAL employees, where airborne levels are recorded below the HSE control limit of 0.1f/cm<sup>3</sup>, will be held within the central asbestos records, controlled by the GAL Asbestos Coordinator. GAL Occupational Health will only be notified when exposure above the HSE control limit of 0.1f/cm<sup>3</sup> has been identified, or where an employee expresses specific concerns about their health.

All records are held in line with GDPR and HSE legislation.

GAL has no legal requirement to hold exposure records of individuals not employed by GAL at the time of any potential exposure

## 1.10 Works Procedures

Under Regulation 5, Control of Asbestos Regulations 2012, an employer must not undertake work which exposes or is liable to expose employees of that employer to asbestos in respect of any premises unless either—

- (a) that employer has carried out a suitable and sufficient assessment as to whether asbestos, what type of asbestos, contained in what material and in what condition is present or is liable to be present in those premises; or
- (b) if there is doubt as to whether asbestos is present in those premises, that employer—
  - (i) assumes that asbestos is present, and that it is not chrysotile alone, and
  - (ii) observes the applicable provisions of these Regulations.

Works are defined as any activity that has the potential to disturb the fabric, finishes, services or plant of a building or structure and includes underground services located within the Airport estate.

Works undertaken in buildings or areas constructed or refurbished before 2000 or where the year of construction or refurbishment cannot be determined must follow the process as detailed in **20000-XX-Q-XXX-PRO-010012** – Asbestos Works Procedure, as applicable.

Further guidance and advice can be sought from the GAL Asbestos Coordinator.

## 1.11 Asbestos Management Service Suppliers

When there is a requirement for asbestos surveys, remediation or air monitoring services on any GAL controlled asset, an appropriate contractor will be selected. This may be a GAL framework supplier, or, with the permission of the GAL Asbestos Coordinator, a supplier nominated by a 3<sup>rd</sup> Party

### 1.11.1 Framework Suppliers

GAL framework suppliers will be selected based on the following criteria;

#### General Requirements

- Delivery of a satisfactory presentation at tender stage
- Production of proposal, plan of works and risk assessment for site specific scenarios
- Supply of references from Clients of a similar size, structure and/or Industry
- Declaration of any enforcement action or pending enforcement action against the organisation or its employees in a rolling 5-year period
- Demonstration of an adequate QMS system
- Ability to prepare and submit documents via EDMS (Meridian Portal)
- Accredited by Alcumus SafeContractor
- Insured to the appropriate levels
- Sufficient suitably trained and competent resources.
- Ability to operate in an airside environment without supervision

#### Asbestos Surveys

- Accreditation to UKAS BS EN ISO/IEC 17020
- Material testing and sample analysis must be carried out by a laboratory accredited to UKAS BS EN ISO/IEC 17025 for bulk analysis and a member of AIMS

#### Asbestos Removal Contractor

- Holder of current HSE licence
- Membership of either ACAD or ARCA professional body
- Holder of appropriate EA Hazardous Waste Licence

#### Analytical Services

- Accreditation to UKAS BS EN ISO/IEC 17025
- Member of RICE scheme

### 1.11.2 Nominated Suppliers

Suppliers nominated by a 3<sup>rd</sup> Party, such as a tenant or principal contractor, and approved by the GAL Asbestos Coordinator must comply with GAL contractor requirements and hold all necessary mandatory training.

Copies of all nominated supplier's paperwork must be shared with the GAL Asbestos Coordinator. This includes but is not limited to;

- RAMS
- Survey Reports
- Air Monitoring Reports, including Certificates for Reoccupation
- Certificates of Completion
- Waste Consignment Notes

## 1.12 AMP Monitoring and Review

An annual review and audit of this asbestos management plan and related documents will be carried out by GAL and a nominated competent consultant.

The asbestos management review will:

- address the need for any changes to the policy, plan, procedures, or other elements
- reflect on management audits results
- assess any changes to circumstances of the business
- provide an opportunity for continual improvement of asbestos management
- review any incident involving asbestos in the preceding 12 months
- carry out training needs analysis

The review will ensure the asbestos management strategy's continuing suitability, adequacy, and effectiveness. The review process will ensure the necessary information is collected to allow this evaluation. This review and audit shall be documented, and the outcomes reported via MCR and the Asbestos Steering Group.

## 1.13 Action Plan

The Action Plan will consist of the findings of the annual audit and review, along with recommendations, both Management activities and remedial works, documented and agreed in the Asbestos Steering Group. It will also include the recommendations of any asbestos related EHS investigations.

These actions will contain priorities and timetables or targets for both remedial works, e.g., removal works, and nonremedial work e.g., training issues, survey requirements and will be formally documented and monitored at Asbestos Steering Group meetings.

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.

Audit, Gap Analysis and Action Plan documentation is to be retained by the Asbestos Coordinator.

## 1.14 Communication

Communicating the GAL asbestos management strategy and information on where to find it will be achieved through the following:

- Airport Inductions
- GAL Managing Corporate Responsibility governance (MCR).

- GAL Intranet
- Airport Notices
- Asbestos Steering Group meetings.
- Contractor forums.

## 2. Reference Material

### 2.1 Legislation

- *Health & Safety at Work Act 1974*
- *Control of Asbestos Regulations 2012*
- *Management of Health and Safety at Work Regulations 1999*
- *Construction (Design and Management) Regulations 2015*
- *Health & Safety (Safety Signs and Signals) Regulations 1996*
- *Control of Substances Hazardous to Health Regulations 2002*
- *Hazardous Waste Regulations 2005*
- *Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013*

### 2.2 HSE Guidance Publications

- *HSG53 – Respiratory Protective Equipment*
- *HSG210 – Asbestos Essentials*
- *HSG227 – A Comprehensive Guide to Managing Asbestos in Premises*
- *HSG264 – Asbestos: The Survey Guide*
- *HSG247 – Asbestos: The Licenced Contractors Guide*
- *HSG248 – Asbestos: The Analysts' Guide for Sampling, Analysis and Clearance Procedures*
- *INDG289 – Working with Asbestos in Premises*
- *INDG223 – Managing Asbestos in Buildings*
- *L143 - Control of Asbestos Regulations 2012. Approved Code of Practice and guidance*
- *L153 – Managing Health and Safety in Construction. Construction (Design and Management) Regulations 2015*

### 2.3 Other Guidance Documents

- CIRIA C733 - Asbestos in soil and made ground: a guide to understanding and managing risks
- CIRIA C765 - Asbestos in soil and made ground: good practice site guide
- CL:aire CAR-SOIL™ - Control of Asbestos Regulations 2012: Interpretation for Managing and Working with Asbestos in Soil and Construction and Demolition Materials

### 2.4 UKAS Accreditation

- *ISO/IEC 17020:2012 – Inspection Bodies*
- *ISO/IEC 17025:2017 – General requirements for the competence of testing and calibration laboratories*
- *RG8 – Accreditation of Bodies Surveying for Asbestos in Premises*
- *LAB30 – Application of ISO/IEC 17025 for Asbestos Sampling and Testing*
- *TPS 47 – UKAS Policy on Participation in Proficiency Testing*



## 2.5 GAL Standards and SOPs

- 20000-XX-Q-XXX-SOP-000008 – *Permit to Work System*
- 20000-XX-Q-XXX-SOP-000010 – *Engineering Keys*
- 20000-XX-Q-XXX-STD-000168 – *Fundamentals*
- 20000-XX-Q-XXX-STD-000033 – *Document Control*
- GAL/PRO/MRS/19 – *Incident Response, Reporting & Investigation*
- GAL/PRO/ENV/22 – *Management of Land Contamination*

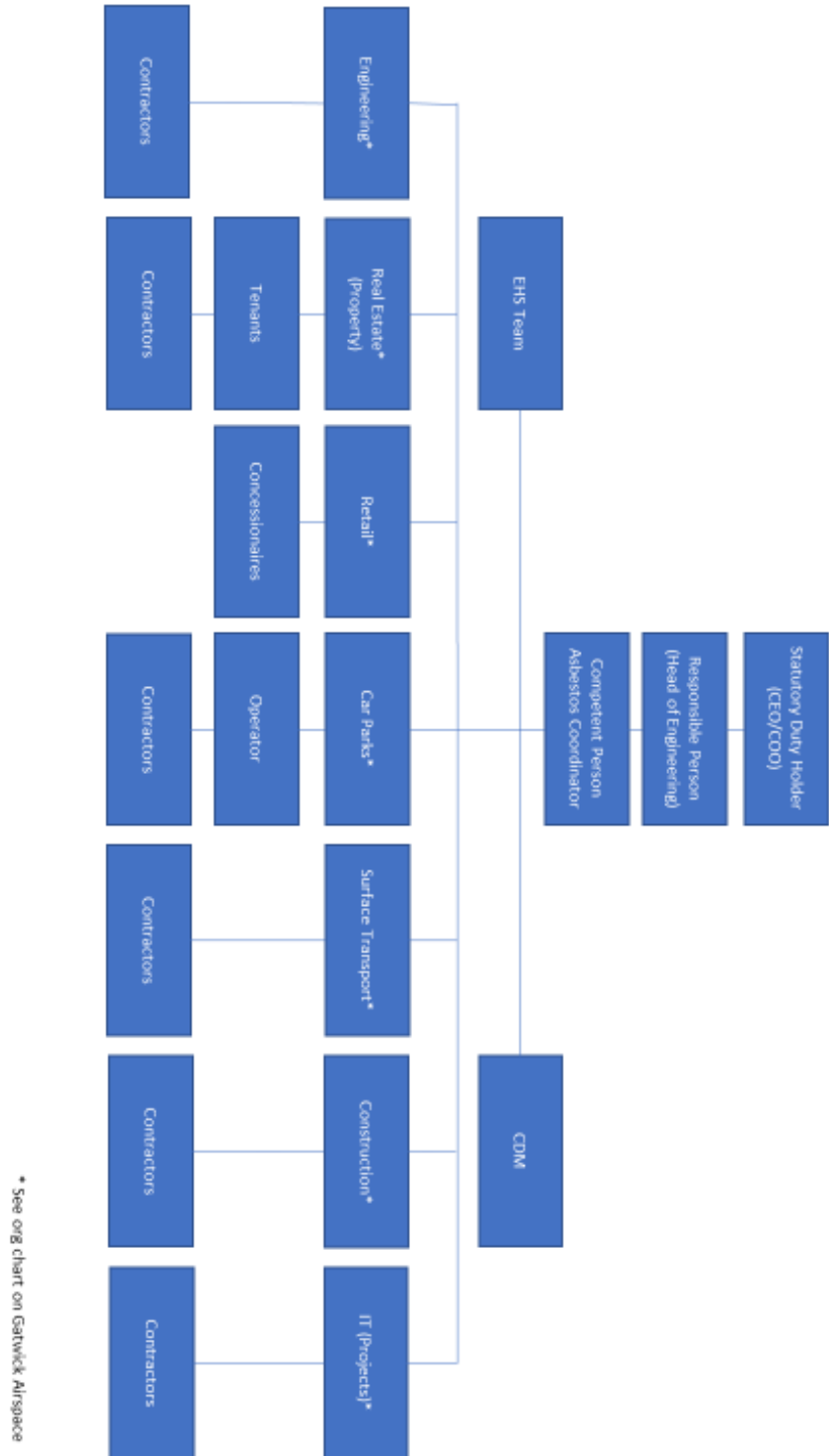
## 2.6 GAL Asbestos Procedures

- 20000-XX-Q-XXX-PRO-010012 – *Asbestos Works Procedure*

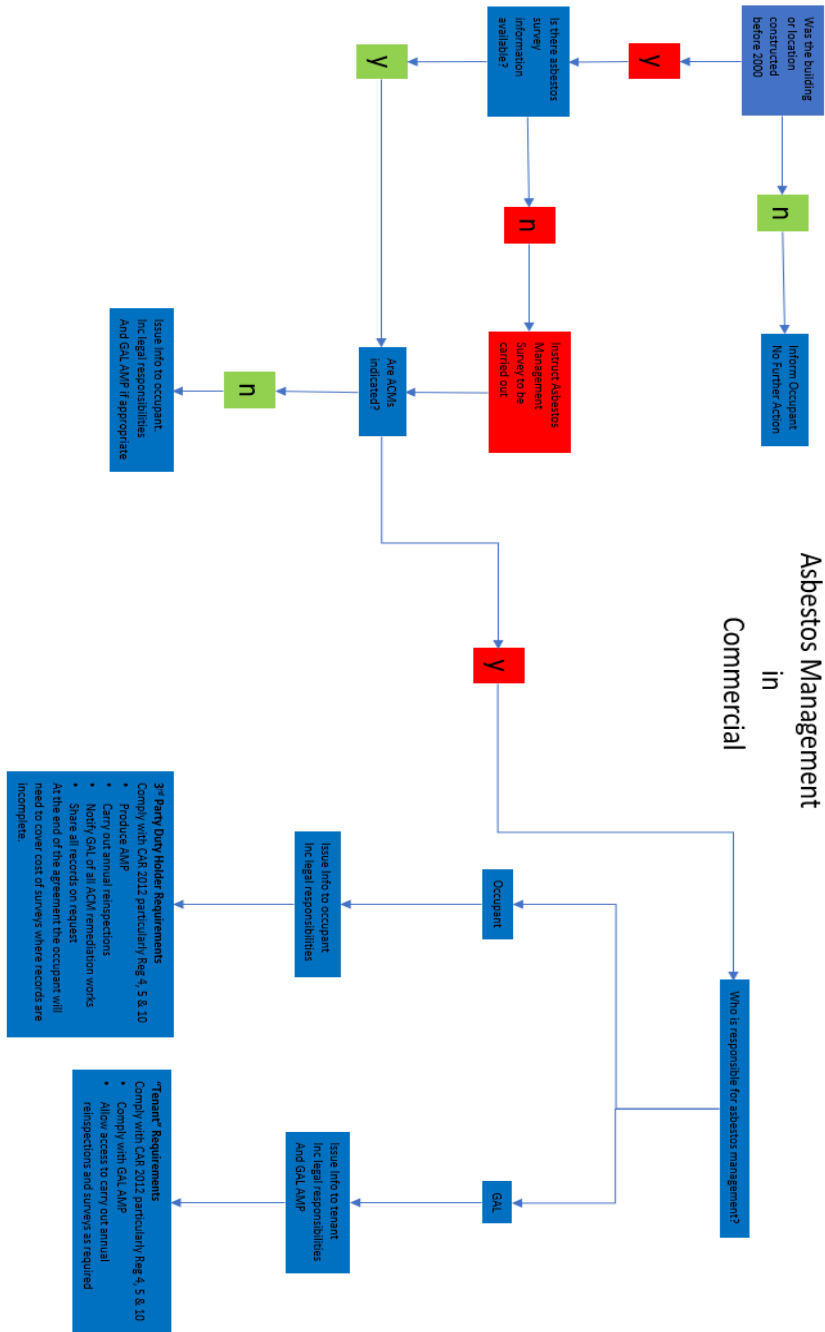
## 2.7 Additional References

- *Asbestos Management Contractors internal SOP(s)*
- *Gatwick Byelaws*
- *Airport Notices*
- *Airport Directives*
- [www.hse.gov.uk](http://www.hse.gov.uk)

**Appendix A: GAL Asbestos Organisational Chart**



**Appendix B: Asbestos Management in Commercial Flow Chart**



**Appendix C: Asbestos RFI form (EXAMPLE)**

**ASBESTOS INFORMATION REQUEST**

Request Number \_\_\_\_\_  
(GAL use only) .....

**Please enter your details CLEARLY to enable processing and despatch of your Request.**

Requested by (Name) :		Company :	
Date submitted :		<b>ALLOW 5 FULL WORKING DAYS</b>	
Contact Tel No. e-mail address:			

**Location Details**

Building Name/Number		Floor or Level :	
Room Number(s): <b>(Use current GDT plan)</b>		Drawing Required	

**Notes:**

1. The output will be an extract of all currently known data. The information contained within is for reference only and is correct at the time of distribution. The GAL asbestos register is a live document and updated on a daily basis.
2. The information supplied is not to be used to enable intrusive project works or maintenance tasks. A Project Asbestos Information Request (20000-XX-H-XXX-TMP-010000) must be submitted.
3. For general/further advice, contact the GAL Asbestos Coordinator.

For what purpose is this information requested?		
Disclaimer:	By signing the application below, the requester confirms that having agreed to reading <u>notes 1 and 2</u> , the report is solely for the individual and the purpose described above and will not be issued to any third party without prior written permission from GAL Asbestos Coordinator	
<b>NO DATA WILL BE DISCLOSED WITHOUT A SIGNATURE</b>		
Signature:	Print name:	Date:

**When complete please e-mail as an attachment to [asbestos\\_coordinator@gatwickairport.com](mailto:asbestos_coordinator@gatwickairport.com)  
Please allow 5 FULL working days for processing.**

**Appendix D: Training Needs Analysis**

**Suggested Training Needs Analysis Gatwick Airport**

Job Role/Qualification	Non Licensed Training	BOHS PAQ2 Surveying	BOHS PAQ5 Asbestos in Buildings	BOHS PAQ7 Duty Holder	Duty to Manage	Duty to Appoint Person	Asbestos in Soils	W504	Certificate of Competence (desirable)	IOSH Leading Safely	Asbestos for Project Managers	Entry into Controlled Environments	Entry into Enclosures
COO Duty Holder					X					X			
Head of Engineering Responsible Person					X	X							
Asbestos Coordinator		X	X	X	X	X	X	X	X		X		
Property Asset Manager					X								
Property Facility Manager					X								
Engineering Manager					X								
Estates Utilities and Environment	X											X	
HVAC	X											X	
FM (Mtle)	X											X	
EDM/ADE												X	X
LSS												X	
Electronics													
Project Managers											X		
EST		X											
Property Inspectors			X										
Environmental Managers							X						
Civils Principal Engineer							X						
Other Principal Engineers													
Other Engineering													
Apprentices													
Other maintenance contractors													
Civils contractors							X						
Construction contractors													
Project and Field Engineers											X		
CDM											X		
Retail Managers					X								
EHS Team					X						X		

**Appendix E: Labels and signs**

Sign 1. Vinyl Size 100 x 135mm



Sign 3.  
3mm dibond size 210 x 297mm



Sign 2.  
Vinyl Size 28 x 52mm



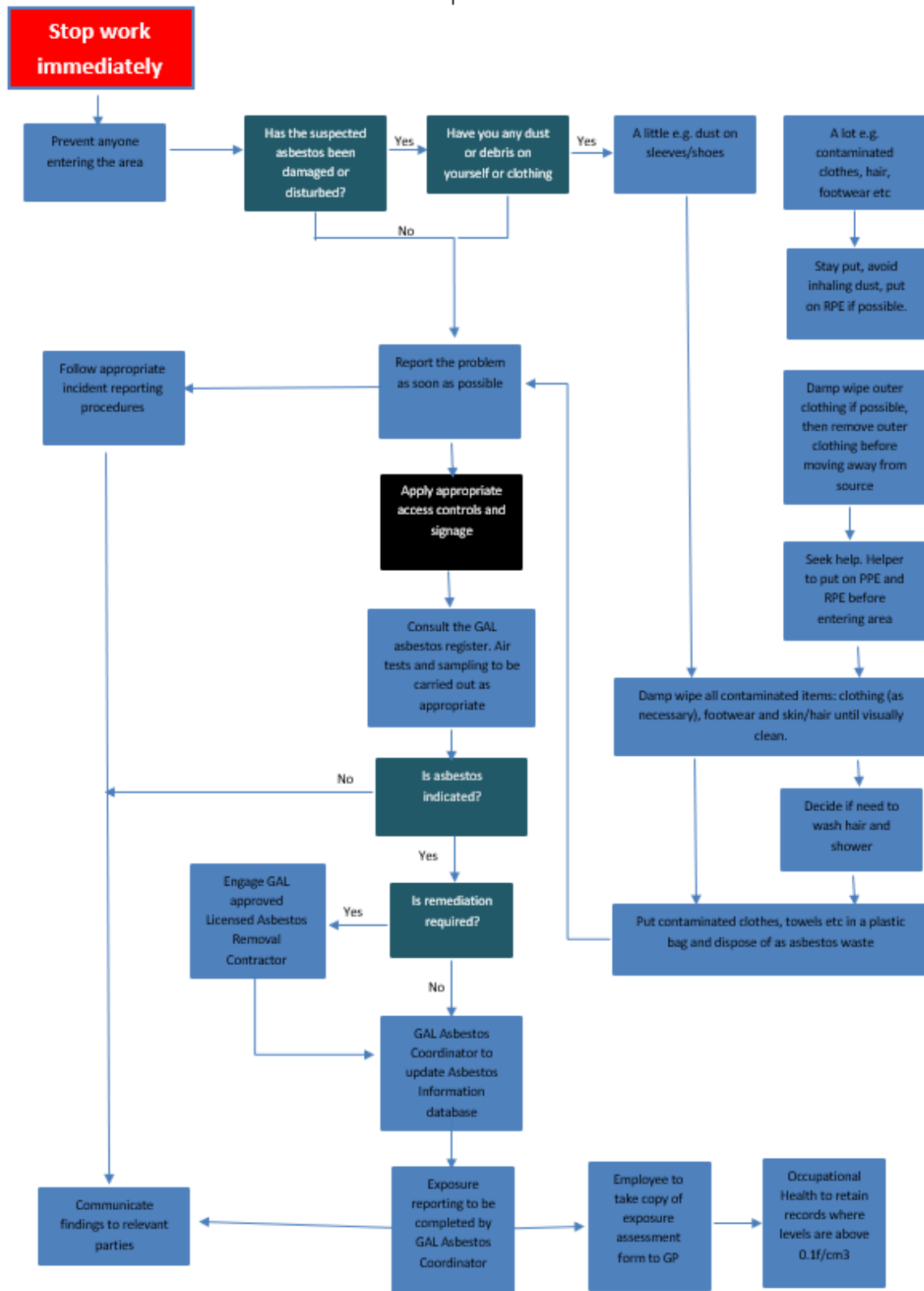
Sign 6.  
Vinyl Size 28 x 52mm



Sign 5.  
Vinyl Size 150 x 110mm



**Appendix F: Emergency Plan**



Adapted from HSG210 – Asbestos Essentials sheet em1

**Appendix G: Terminology and Definitions**

Term	Description/Definition
Asbestos Register	Database containing the location, condition and risk scoring of known and presumed ACMs throughout the Airport
Asbestos Information Database	Database held by the Asbestos Coordinator of all asbestos related information collected as part of works carried out at Gatwick Airport
Asbestos Management Contractors	The collective name for the Asbestos Survey, Asbestos Remediation and Air Monitoring Contractors
Commercial	Property, Retail and Surface Transport
CEM system	Electronic access control system employed throughout Gatwick Airport utilising card readers and ID cards to manage suitable access and security.
Demolition Survey	Fully intrusive survey involving destructive investigation determining the location and extent, so far as reasonably practicable, all ACMs within a building or structure before it is removed, dismantled or demolished. Also known as a pre-demolition survey.
ESR Instructed Person	Basic training required to allow access to Engineering areas. This includes the fundamentals including risk identification and reporting procedures.
GA Floorplan	Drawing showing the general layout of a particular floor within any given building, indicating location numbers and descriptions.
Gatwick Airport Limited (GAL) employees	Persons who are employed directly by Gatwick Airport Limited or are specialists employed through a third party and contracted to GAL e.g. Construction Project Managers, etc.
Licensable Works	Higher risk Asbestos remediation works that must be carried out by an HSE licensed contractor Licensable work with asbestos is work: where worker exposure to asbestos is not sporadic and of low intensity; or where the risk assessment cannot clearly demonstrate that the control limit will not be exceeded i.e. 0.1 asbestos fibres per cubic centimetre of air (0.1 f/cm <sup>3</sup> ) (averaged over a four-hour period); or on asbestos coating; or on asbestos insulation or asbestos insulating board where the risk assessment demonstrates that the work is not short duration work, e.g. when work with these materials will take no more than two hours in any seven day period, and no one person works for more than one hour in that two hour period. All licensable work must be notified to the appropriate enforcing authority using the ASB5 form at least 14 days before the work starts.
Management Survey	Minimally intrusive survey determining, so far as reasonably practicable, the location, extent and condition of ACMs which could be damaged or disturbed by general occupation and foreseeable maintenance and installation.
Non-Licensed Works	Lower risk Asbestos remediation works that do not require an HSE licensed contractor (although they must still be competent and have appropriately trained operatives.) To be exempt from needing a license the work must be: Sporadic and of low intensity - to be considered sporadic and of low intensity the concentration of asbestos in the air should not exceed 0.6f/cm <sup>3</sup> measured over 10 minutes Carried out in such a way that the exposure of workers to asbestos will not exceed the legal control limit of 0.1 asbestos fibres per cubic centimetre of air (0.1 f/cm <sup>3</sup> ) (averaged over a four-hour period)



	<p>Meet at least one of the four following conditions:          It is a short non-continuous maintenance task, with only non-friable materials (friability describes how likely an ACM is to release asbestos fibres when worked on, so non-friable materials will only release a small number of fibres during work); or          It is a removal task, where the ACMs are in reasonable condition and are not being deliberately broken up, and the asbestos fibres are firmly contained within a matrix, e.g. the asbestos is coated, covered or contained within another material, such as cement, paint or plastic; or          It is a task where the ACMs are in good condition and are being sealed or encapsulated to ensure they are not easily damaged in the future; or          It is an air monitoring and control task to check fibre concentrations in the air, or it's the collection and analysis of asbestos samples to confirm the presence of asbestos in a material.          Some non-licensed works are notifiable to the HSE (see <a href="http://www.hse.gov.uk">www.hse.gov.uk</a> for further details)</p>
Refurbishment Survey	<p>Scope defined fully intrusive survey determining, so far as reasonably practicable, the location, extent and condition of ACMs likely to be disturbed by a proposed scope works including intrusive maintenance and repair work and/or plant removal/dismantling. Also known as a pre-refurbishment survey.</p>
Reinspection	<p>Annual condition inspection of all known and presumed ACMs within a building or site.</p>
Works	<p>All construction programmes, asset replacement, maintenance and other non-construction programmes as defined by Construction (Design and Management) Regulations 2015 or any other activity that has the potential to disturb the fabric, finishes, services or plant of a building or structure and includes underground services located within the Airport estate.</p>

## Appendix H: Acronyms and Abbreviations

Abbreviation	Description
ACM	Asbestos Containing Material
AMP	Asbestos Management Plan
CIRIA	Construction Industry Research and Information Association
CL:aire	Contaminated Land: Application in Real Environments
CMMS	Computerised Maintenance Management System (Ultimo)
CSC	Contractor Support Centre
EA	Environment Agency
EOM	Engineering Operations Manager
EDMS	Engineering Data Management System (Meridian)
EHSOR	Environmental, Health, Safety and Operational Resilience
ESR	Electrical Safety Rules
GA	General Arrangement (Drawings)
GAD	Gatwick Airport Directive
GAL	Gatwick Airport Limited
GAN	Gatwick Airport Notice
GDT	Graphical Data Team (also known as Asset Information Team)
HSE	Health and Safety Executive
LARC	Licensed Asbestos Removal Contractor
LGW	London Gatwick Airport
LOP	Local Operating Procedure
MCR	Managing Corporate Responsibility
NNLW	Notifiable Non-Licensed Works
P2W	Permit to Work
PDF	Portable Document Format
RAMS	Risk Assessment & Method Statement
RFI	Request for Information
SOP	Standard or Safe Operating Procedure
SSSTS	Site Supervisor Safety Training Scheme
UKAS	UK Accreditation Service