

# Asbestos Management Plan

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Changes to the previous revision are indicated by the use of side line revision marks as shown to the right of this paragraph.

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## About This Document

Control of Asbestos Regulation 4 requires that reasonable steps are put in place to manage the risk posed by the presence of ACMs in non-domestic premises. Those responsible for managing these risks are termed "the dutyholder" (see definition in Appendix F).

The broad requirements on the dutyholder 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 ACMs.
- Monitor the condition of asbestos and presumed ACMs.
- Assess the presence of, and the risk of exposure to asbestos and presumed ACMs and document the actions necessary to manage the risk.
- Provide information about the location and condition of ACMs to anyone who might disturb them.
- Take steps to see that the actions above are carried out.

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

- Keep and maintain an up-to-date record of the location, condition, maintenance, and removal of all ACMs on the premises.
- Repair, encapsulate or remove if there is a risk of exposure due to the condition or location of any ACMs.
- 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.
- Ensure arrangements and procedures are in place, so that work which may disturb the material complies with Control of Asbestos Regulations 2012.
- Review the plan and arrangements at regular intervals and amend as necessary if circumstances change.

**There is also a duty on those who control access to buildings (or part thereof), land or structures to allow the dutyholder to carry out their duties.**

With construction of the current London Gatwick 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.

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

It is applicable to all premises, land and structures (where GAL are responsible for maintenance), their occupants, visitors and/or those undertaking maintenance and/or construction activities to them.



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## 1 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 (ACMs).

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 ACMs 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 Ltd.
- Provide and maintain comprehensible information on the location of known and presumed ACMs for all relevant parties that require it.
- Engage with key staff and groups to increase awareness of the management of asbestos and related issues.
- Provide information and advice on asbestos related topics.
- Regularly review the Asbestos Management Plan, policy, and procedures.

Signed by:

*Steve Kelso*

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Steve Kelso  
Head of Engineering

GAL will monitor and regularly review this policy and supporting management systems ensuring it remains relevant to the company's risks/opportunities driving continuous performance improvement.

Details of the organisation and arrangements for delivering this policy are included in this Asbestos Management Plan

## 2 Roles and Responsibilities

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

Further details of the GAL organigram can be found on Airspace.

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

### 2.1 All staff, occupants, and visitors

- Immediately reporting:
  - Any known ACMs, in the building, plant, or equipment, which are damaged or disturbed
  - Any previously unidentified suspected ACMs of any condition.





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- Any defects or concerns they may have related to asbestos issues or remedial works.
- Undertaking GAL induction and Asbestos Awareness as required.
- Undertaking a robust asbestos-related training programme, as appropriate
- Not carrying out any activities likely to disturb the fabric, finishes or services of any building or structure, including underground services, without first consulting the Asbestos Register.
- Complying with this Asbestos Management Plan and any related procedures and legislation.

## 2.2 GAL Dutyholder – Head of Engineering

- The GAL Dutyholder carries overall responsibility and control for providing adequate resources, proportionate to the risks associated with exposure to asbestos and that they are managed appropriately.

## 2.3 GAL Responsible Person – Senior Engineering Manager (Terminals)

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

## 2.4 GAL Appointed Competent Person – Asbestos Coordinator

- Managing the Asbestos Register
- Ensuring relevant GAL asbestos related drawings are kept up to date.
- 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 and e-learning.
- Attending project meetings as required.
- Maintaining regular dialogue with the GAL HSE department including reports on visits and actions by the Health & Safety Executive (HSE), local authority environmental health and similar bodies.
- Providing the HSE and similar bodies with details of asbestos management procedures and projects where relevant.
- 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.
- Reviewing plans of work and risk assessments and discussing amendments with the relevant parties.



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- Ensuring site works comply with relevant GAL requirements and current legislation.
- Monitoring and auditing Asbestos Contractors to assess their compliance with statutory and GAL requirements, reporting and discussing deficiencies with the Responsible Person and GAL HSE team.
- Stopping work where any Contractor carrying out works does not perform to the required health and safety standards, or where their actions appear likely to result in a breach of Health and Safety or GAL standards.
- Assessing requirements related to relevant air monitoring strategies.
- Carrying out the 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.
- Assessing, reviewing, and recommending management actions considering inspection findings and changes in legislation 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 known and presumed ACMs.
- Controlling access to contaminated areas in conjunction with the GAL Engineering Control Centre team.
- Recommending and specifying programmes of work for asbestos management specific projects.
- Investigating asbestos related incidents and near misses in conjunction with the GAL HSE department.
- 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 2012 have been exceeded, forwarding the assessment to the GAL HSE department.
- 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 London Gatwick estate in line with legislation, guidance, and GAL procedures.

## 2.5 GAL HSE Department

- Supporting the GAL Asbestos Coordinator in the delivery and compliance of the Asbestos Management Plan and Management of Asbestos procedures and associated legislation.
- Working with the GAL 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 2012, to the HSE under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) and collating Dangerous Occurrence Forms.
- Providing health and safety advice.



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- Reviewing, with the GAL Asbestos Coordinator, relevant regulatory requirements and best practice.

## 2.6 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 where the exposure is shown to be above the control limit.

## 2.7 GAL Project Managers

For this document a project manager is defined as any person organising and coordinating works.

The Project Manager is responsible for ensuring that:

- The necessary requirements for the safe management of known and presumed ACMs are fully identified and incorporated into any design or specification.
- All appropriate actions within this AMP and current management of asbestos procedures are implemented.
- All relevant members of the project team are fully briefed in respect of this AMP and their duties as specified in any management of asbestos procedures and have the necessary skills to discharge their responsibilities.
- All relevant members of the project team are aware of the Asbestos Register and the routes by which asbestos information can be obtained.
- Project changes are promptly reviewed in relation to asbestos information, for example where there is an extension of the project area, or changes to services and/or installations occur. 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 asbestos related works use the appropriate contractors as set out in Section 10 – Asbestos Management Service Suppliers
- 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 or presumed ACMs affecting the project.
- Works are halted, in line with the GAL Emergency Plan (**Appendix E**), if suspected ACMs are discovered, or known ACMs are disturbed 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.



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- Local arrangements are made with building users and service providers to facilitate the asbestos related works.
- Where appropriate, an asbestos contractor pre-start meeting is organised to agree the scope of works.

## 2.8 GAL Engineering Operations Centre (EOC)

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

## 2.9 GAL Engineering Managers

- Contacting the GAL Asbestos Coordinator regarding any work to be undertaken which may involve ACMs.
- Assisting the GAL Asbestos Coordinator to ensure that 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.
- Ensuring that all staff and contractors are provided with appropriate access to the data contained within the Asbestos Register
- Understanding the asbestos-related risks in their department, including the location of known and presumed ACMs, or arising from departmental activities.
- Implementing any measures deemed necessary by the GAL Asbestos Coordinator.
- Undertaking the responsibilities of the Project Manager (Section 2.7) when appropriate.

## 2.10 GAL Property Team

- Providing relevant asbestos information to the occupants of the buildings and/or areas they manage and detailing their responsibilities under legislation.
- Having knowledge of the location of known and presumed ACMs within the buildings they manage so they can monitor the condition (in addition to inspections conducted by or on behalf of the GAL Asbestos Coordinator) and reporting any changes in condition to the GAL Asbestos Coordinator.
- Providing information from the Asbestos Register to relevant persons when requested.
- Being familiar with, participating in, and helping to coordinate asbestos emergency procedures.
- Undertaking the responsibilities of the Project Manager (section 2.7) when appropriate.
- Liaising with asbestos management service providers as and when necessary.

## 2.11 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 service providers as required.
- Assisting the GAL Asbestos Coordinator in discharging their duties.



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- Undertaking the responsibilities of the Project Manager (section 2.7) when appropriate.
- Undertaking their duties relating to asbestos management as described within the Retail Concession Agreement.

## 2.12 Asbestos Survey Contractors

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

- Maintaining UKAS accreditation relevant to instructed tasks.
- Ensuring they, their staff and any sub-contractors are competent in their allotted tasks, undertake GAL mandatory training and toolbox talks as relevant.
- Complying with current legislation, associated Approved Codes of Practice & Guidance, this AMP & related GAL Management of Asbestos procedures and any other relevant GAL procedure or standard.
- Providing pro-active support to GAL and its contractors.
- Carrying out asbestos surveys, sampling, and investigations, to capture all ACMs on the Gatwick Airport estate, as fully as reasonably practicable.
- Providing effective implementation of programmes and projects related to asbestos surveying, sampling, and investigation at London Gatwick.
- Undertaking the application and completion of GAL specified work permits and isolations 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 Portal) 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.

## 2.13 Air Monitoring Contractors

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

- Maintaining UKAS accreditation relevant to instructed tasks.
- Ensuring they, their staff and any sub-contractors are competent in their allotted tasks, undertake GAL mandatory training and toolbox talks as relevant.
- Complying with current legislation, associated Approved Codes of Practice & Guidance, this AMP & related GAL Management of Asbestos procedures and any other relevant GAL procedure or standard.
- Providing pro-active support to GAL and its contractors.
- When requested,
  - Reviewing and commenting on asbestos works specifications and, prior to start of the works, on the Contractor's Plan of Work.
  - Providing quotations which reflect the anticipated project site and analytical requirements.





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- Attending meetings, including but not restricted to, Pre-start, Project Progress and Handover Meetings.
- Undertaking the application and completion of GAL specified work permits and isolations relevant to the survey, sampling, or investigation 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 Remediation Contractors performance, including suitability of the work areas, adherence to the Plan of Work, Statutory Requirements 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 GAL Asbestos Coordinator regarding progress of site works.
- Reporting to the Project Manager and 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 air monitoring reports, including 4 Stage Clearance and Certificate of Re-Occupation, to the Project Manager and GAL Asbestos Coordinator on completion of site works by both email and EDMS.

## 2.14 Asbestos Remediation Contractors

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

- Complying with current legislation, associated Approved Codes of Practice & Guidance, this AMP & related GAL Management of Asbestos procedures and any other relevant GAL procedure or standard.
- 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 the appropriate 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 period.
- Attending the asbestos contract pre-Start meeting, Project Progress Meetings, and handover meeting as required.
- Complying with all reasonable requests from the Project Manager.
- Undertaking the application and completion of GAL specified work permits and isolations relevant to the task in accordance with 20000-XX-Q-XXX-SOP-000008 - Permit to Work System.



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- 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.

## 2.15 All Contractors

- Ensuring that they respond to, and maintain, all communications with their GAL contacts.
- Complying with current legislation, associated Approved Codes of Practice & Guidance, this AMP & related GAL Management of Asbestos procedures and any other relevant GAL procedure or standard.
- Ensuring that all sub-contractors are informed of this AMP and relevant procedures and are aware of the location of known and presumed ACMs within the project area.
- Co-operating with any asbestos management 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.
- Undertake the GAL mandatory training, including LGW Induction which will highlight this AMP and related procedures.

## 2.16 Tenants and Concessionaires

- Carrying out their duties under Control of Asbestos Regulations 2012 and as set out in Appendix B, where they hold responsibility for maintenance.
- Adhering to the relevant processes and procedures as set out in their agreement, contract, licence, or lease.
- Ensuring cooperation with GAL and its asbestos management service providers to meet its duties and responsibilities under all relevant legislation.

## 3 Training

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 instructs and/or 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.





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## 3.1 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.

## 3.2 Asbestos Awareness

Asbestos Awareness must be undertaken by GAL employees and contractors whose work could foreseeably disturb the ground and/or fabric, finishes, services or plant of a building or structure and includes underground services located within the London Gatwick estate, and expose them to asbestos and/or those who supervise or influence the work and should be decided on a case-by-case basis dependant on the specific role:

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 ACMs
- Know how to avoid the risks from asbestos.
- Know where to obtain information on known and presumed ACMs locations prior to commencing work.
- Know what to do if suspicious materials are found.
- Know 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 understand the appropriate emergency arrangements.

Refresher training must be undertaken in-line with each company's internal policies. For GAL staff it will be no more than every 2 years.

## 3.3 Additional Training

It is essential that anyone who may disturb asbestos, either by themselves or those who instruct, 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 skills, knowledge, ability, training and experience.

GAL staff and its contractors will undertake a robust asbestos specific training programme appropriate to their role and works, as identified within their training needs analysis.



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## 4 Asbestos Information

### 4.1 Asbestos Management Software

GAL utilises the cloud based asbestos data management platform TEAMS Enterprise. This allows asbestos consultancies to directly input asbestos data and reports into the platform whilst GAL retains overall control.

### 4.2 Asbestos Register

As an extension to TEAMS Enterprise, information on the location of all identified and presumed ACMs, and non-accessed areas can be found through the TEAMS Portal which is managed and controlled by the GAL Asbestos Coordinator. This is a cloud-based portal that gives the user live information on the presence and condition of ACMs.

Access to the portal can be requested via the GAL Asbestos Coordinator.

### 4.3 Asbestos Reports and other documentation

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

GAL controls all asbestos documentation through appropriate systems to ensure that:

- They can be readily 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 the statutory period. Procedures and responsibilities will be established and maintained concerning the creation and modification of the various documents in line with 20000-XX-Q-XXX-STD-000033 – Document Control.

Asbestos related reports and drawings can be requested from the GAL Asbestos Coordinator.

## 5 Action Plan

The Action Plan will consist of the findings of any audits and/or reviews, along with recommendations, both management activities and remedial work. It will also include the recommendations of any asbestos related GAL HSE investigations.

These actions will contain priorities and timetables or targets for completion, for both remedial works, e.g., removal works, and nonremedial work e.g., document reviews, training and survey requirements, and will be formally documented.

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



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

The Action Plan is to be retained by the GAL Asbestos Coordinator on SharePoint. Access is available on request.

## 6 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—
  - o (i) assumes that asbestos is present, and that it is not chrysotile alone, and
  - o (ii) observes the applicable provisions of these Regulations.

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

All Contractors carrying out works, as defined above, must have a robust Asbestos Policy that includes a procedure detailing how they will comply with Regulation 5.

“Project” 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 – Management of Asbestos in Projects, as applicable.

The GAL Asbestos Coordinator must be informed, in writing, of the dates and times of all works that have the potential to disturb asbestos on the London Gatwick estate.

Further guidance can be found in L143 - Managing and working with asbestos, HSG264 – Asbestos: The Survey Guide or by contacting the GAL Asbestos Coordinator.

Construction (Design and Management) and Management of Health and Safety at Work Regulations will also be applicable.

## 7 Surveys and sampling

Asbestos surveys and sampling to the built environment will be conducted in line with HSG264 – Asbestos: The survey guide.

Asbestos in Soils and Construction & Demolition Materials Investigations will follow the appropriate GAL Site Investigation standard, CL:aire CAR-SOIL™, CIRIA guidance and HSG248 – Asbestos: The Analysts Guide



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NB – GAL understands that the current guidance within HSG264 is currently open to interpretation 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. GAL recognises 4 types of asbestos survey to be carried out on the built environment, in line with the audit requirements of UKAS document RG8 – Management, Reinspection, Refurbishment and finally Demolition, the definitions of which are below. More expansive explanations can be found within Section 3 of HSG264. If any further information regarding this decision is required, please contact the GAL Asbestos Coordinator.

All buildings and structures constructed pre-2000, or if the age of the building is indeterminate, will require an asbestos survey as detailed below. In the absence of a survey report, asbestos must be presumed throughout.

Asbestos in Soils and Construction & Demolition Materials investigations will be determined by the outcomes of the Land Contamination Risk Management Stage 1 Desk Study/ Risk Assessment.

## 7.1 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 and include any locations not previously accessed or where there have been significant changes to the layout of a building or structure.

## 7.2 Refurbishment Surveys

Refurbishment of an area or building will require specific investigations as guided by the project team, with the survey proportional to the 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.

## 7.3 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.

## 7.4 Reinspections

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

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.

Higher risk items may be inspected at a greater frequency, to be determined and undertaken by the GAL Asbestos Coordinator. These will be recorded in TEAMS Enterprise, in the review comments for each item.

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## 8 ACM Risk Assessments

Following a survey, condition inspection, or unplanned disturbance, each ACM or presumed ACM will need to be assessed to decide on the appropriate action and priority based on their potential for exposure to asbestos.

The results of the risk assessments will be used to develop an asbestos remediation programme which will be included in the Action Plan.

The risk assessments are carried out in 2 parts. The combined score of these two assessments will provide the overall risk score and management priority.

**Further details of the assessment algorithms can be found in Appendix C and HSG227 Appendix 3**

### 8.1 Material Assessments

These are assessments of the condition of the material and the likelihood of it releasing fibres if disturbed based on:

- Product type
- Condition of the ACM
- Any surface treatment
- Type of asbestos

Material assessments will be undertaken by the asbestos surveyor at the point of survey/sampling and included in all survey reports.

### 8.2 Priority Assessments

These assessments determine management priority based on the likelihood of the ACM, or presumed ACM, being disturbed by considering:

- Occupant activity
- Likelihood of disturbance
- Potential for exposure
- Maintenance Activities

Priority Assessments will be undertaken at the point of survey, reviewed by the GAL Asbestos Coordinator and recorded in the TEAMS Enterprise asbestos portal.

## 9 ACM Management Actions

During asbestos surveys and reinspections the asbestos surveyor will give a recommended management action for all known or presumed ACMs. Within the GAL TEAMS Enterprise system there are 5 recommended management actions which can be applied. This section outlines these different management.

Whilst management action recommendations are given by the asbestos surveyor within survey reports, these can be dependent on the type of survey being undertaken. The GAL Asbestos Coordinator will review all recommended actions and based on all available information, decide on the action to be taken. Where this differs from the recommended action, the reasoning will be recorded in TEAMS Enterprise and the Action Plan.



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## 9.1 Inspect Periodically

ACMs that do not show signs of damage or deterioration and are unlikely to be disturbed through normal occupation will be managed through regular inspections in line with the GAL reinspection programme. All known and presumed ACMs are

## 9.2 Encapsulate

This action encompasses enclose, encapsulate and/or 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 its location 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 (LARC) using the appropriate control measures.

## 9.3 Restrict Access

In locations where ACMs are in very poor condition and/or there are uncontained, unbound asbestos fibres, access and permitted tasks will be restricted or prohibited to all but essential personnel until such time as the ACMs can be enclosed, encapsulated, repaired, or removed. Additional support from a LARC may also be required to facilitate access.

Access to all restricted locations must be approved by the GAL Asbestos Coordinator. The EOM has been authorised grant approval to certain areas, depending on the task, in the absence of the GAL Asbestos Coordinator. This will be decided on a case-by-case basis.

A list of all restricted access locations will be held on SharePoint and can also be obtained from the GAL Asbestos Coordinator.

Any asbestos related access restrictions will also be recorded in the GAL Asbestos Portal under the room or site notes for each location.

## 9.4 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 Action Plan.
- Recommended works related to planned projects.
- Unplanned circumstances, e.g., identification of damaged or high-risk ACMs.
- ACMs subject to disturbance by maintenance or building works.

The requirement to remove ACMs will be reviewed by the Responsible Person and GAL Asbestos Coordinator in line with the GAL Asbestos Policy.

## 9.5 Further Investigation (Inaccessible)

This recommendation is used when a potential ACM may be present and cannot be accessed. This may apply to a location, general item (such as a switch panel) or a specific item that can be observed but not sampled. In this situation, as per HSG264, any area not accessed or inspected must be presumed to contain asbestos, unless there is strong evidence that it does not.



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## 9.6 Labelling and Signage

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

Labels are vulnerable to disturbance and/or removal. Labels must therefore be managed together with the ACMs 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 or presumed ACMs and the absence of labels should not be considered an absence of ACMs.

A review of the asbestos labels and signage will be carried out annually to ensure that the information is relevant and up to date.

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

Examples of the current labels and signage used at London Gatwick can be found in Appendix D

## 10 Asbestos Management Service Suppliers

Where GAL is the Asset Owner and 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 3rd Party.

It is GAL policy that there must be no relationship between the survey/analytical contractor and the asbestos remediation contractor as set out in HSG248: Asbestos: The Analysts' Guide – Professional Standards (1.21 – 1.24)

### 10.1 Framework Suppliers

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

#### 10.1.1 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 and must include working with asbestos.
- Sufficient suitably trained and competent resources.
- Ability to operate in an airside environment without supervision.

#### 10.1.2 Asbestos Surveys

- TEAMS user with experience of TEAMS Enterprise clients





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- 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.

## 10.1.3 Asbestos Remediation Contractor

- Holder of current full 3-year HSE licence
- Membership of industry recognised professional body
- Holder of appropriate EA Hazardous Waste Licence

## 10.1.4 Analytical Services

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

## 10.2 Approved Nominated Suppliers

Suppliers, other than GALs framework service providers, that are nominated by a 3rd Party, such as a tenant or principal contractor, and approved by the GAL Asbestos Coordinator, must meet the relevant criteria listed above, comply with GAL contractor requirements and hold all necessary GAL mandatory training.

Any attendance by any contractor carrying out asbestos remediation or works with asbestos, must be accompanied by an analyst from the appointed Asbestos Consultant to carry out air monitoring, unless written dispensation is given by the GAL Asbestos Coordinator.

All reports pertaining to asbestos remediation or works with asbestos must be shared with the GAL Asbestos Coordinator. This includes but is not limited to.

- RAMS
- Survey Reports (and raw data in the TEAMS data template)
- Air Monitoring Reports, including Certificates for Reoccupation
- Certificates of Completion
- Waste Consignment Notes

## 11 Emergency Plan

In line with the Control of Asbestos Regulations 2012, Regulation 15, London Gatwick must have an emergency procedure for asbestos related incidents.

**The GAL Asbestos Emergency Plan flow chart can be found in Appendix E**

The GAL Asbestos Emergency Plan is designed to be implemented in parallel with any 3<sup>rd</sup> party plan and/or procedure.

The primary GAL point of contact for reporting any asbestos related incident is the Engineering Operations Centre.

All Asbestos related unsafe acts/conditions, near misses and incidents must be reported in GAL's Accident and Incident Reporting System and investigated in line with GAL HSE Incident Response, Reporting & Investigation procedure.



Examples of asbestos RIDDOR occurrences can be found on the HSE website.

## 12 Asbestos Exposure Reporting

In all circumstances when known or potential exposure to asbestos has occurred, it will be recorded in GAL's Accident and Incident Reporting System and investigated in line with GAL HSE Incident Response, Reporting & Investigation procedure.

Any uncontrolled exposure above the control limit of 0.1 f/cm<sup>3</sup> must be reported to the HSE as per RIDDOR and GAL Occupational Health notified.

It is the responsibility of the employer to retain appropriate records of individual exposure for the HSE statutory period and in line with the relevant company policy and/or procedure.

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.

All GAL exposure related health records are held in line with GAL's Data Protection Policy 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.

## 13 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. The reviews and their date of completion will be documented in the Action Plan.

## 14 Communication

Communication of 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



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- Contractor Forums

## 15 Reference Material

### 15.1 Legislation

- Health & Safety at Work Act 1974
- Environmental Protection Act 1990
- 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

### 15.2 HSE Publications

- 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
- INDG223 – Managing Asbestos in Buildings
- L143 – Managing and working with asbestos. Control of Asbestos Regulations 2012. Approved Code of Practice and guidance
- L153 – Managing Health and Safety in Construction. Construction (Design and Management) Regulations 2015

### 15.3 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.

### 15.4 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

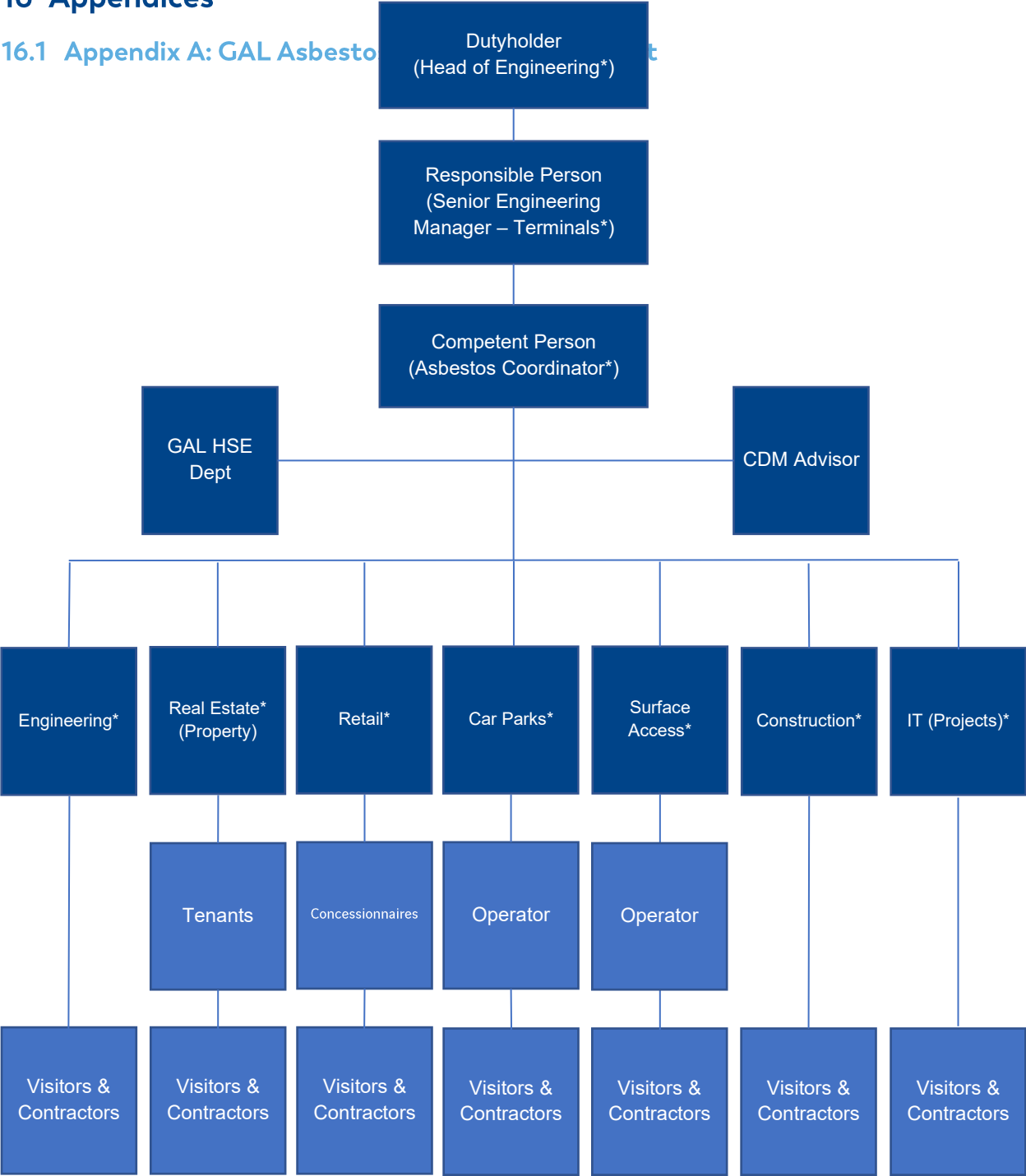
### 15.5 GAL Procedures and Standards

- 20000-XX-Q-XXX-PRO-010012 – Managing Asbestos in Projects
- 20000-XX-Q-XXX-SOP-000008 – Permit to Work System
- 20000-XX-Q-XXX-STD-000033 – Document Control
- GAL/HSE/SOP/18 – Incident Response, Reporting & Investigation

- GAL/PRO/ENV/22 – Management of Land Contamination
- 57/LEG/5 - Data Protection Policy

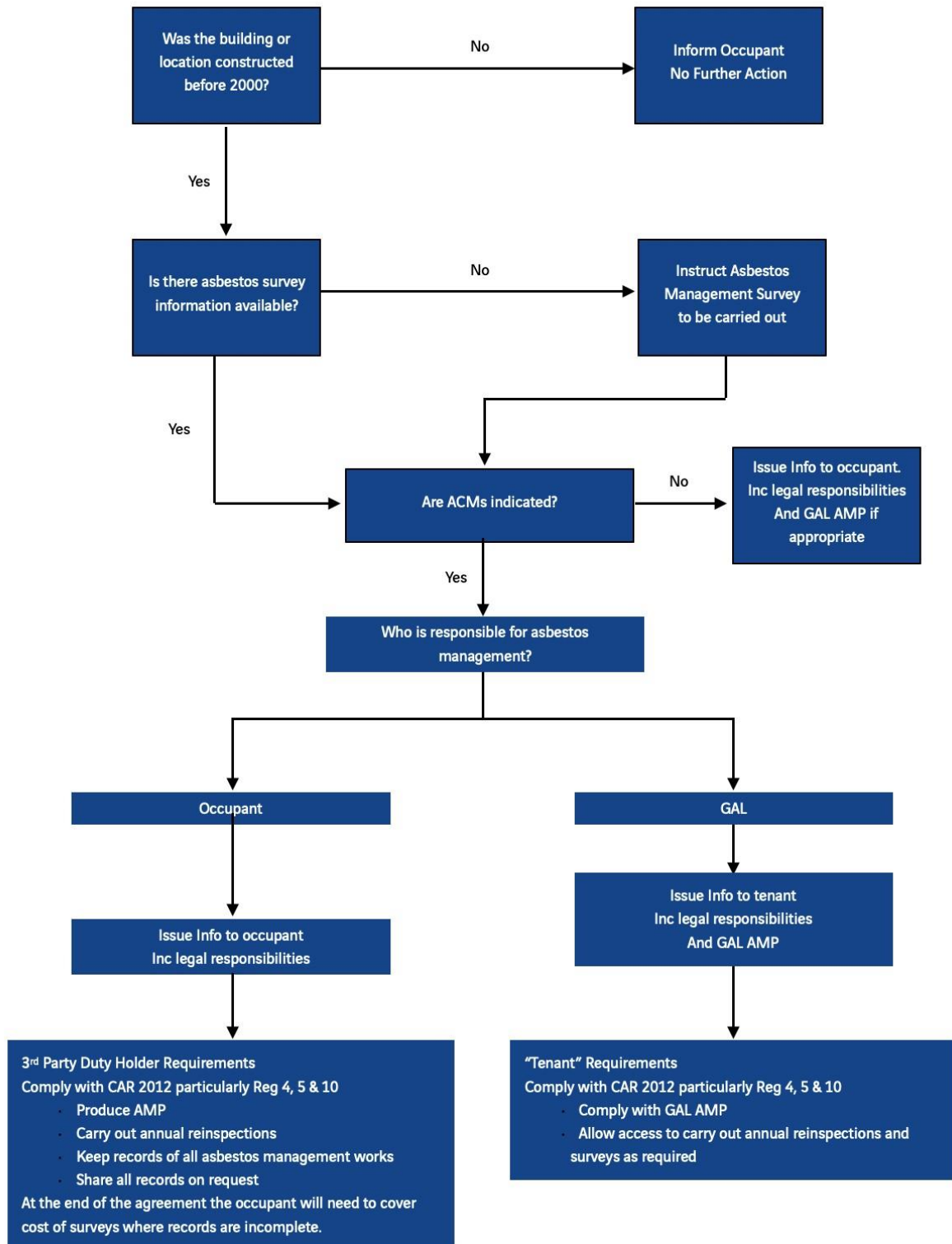
16 Appendices

16.1 Appendix A: GAL Asbestos



\* See org chart on Gatwick Airspace

## 16.2 Appendix B: Asbestos Management in Commercial Flow Chart





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## 16.3 Appendix C: Risk Assessment Scoring

### Material Assessment Algorithm (MA)

*Type, condition, and friability of ACM*

Variable	Score	Category
Product type (or debris from)	1	Asbestos-reinforced composites (plastics, resins, mastics, roofing felts, vinyl floor tiles, semi-rigid paints or decorative finishes, asbestos cement etc)
	2	Asbestos insulating board, mill boards, other low density insulation boards, asbestos textiles, gaskets, ropes and woven textiles, asbestos paper and felt
	3	Thermal insulation (eg pipe and boiler lagging), sprayed asbestos, loose asbestos, asbestos mattresses and packing
Material Condition	0	Good condition: no visible damage
	1	Low damage: a few scratches or surface marks; broken edges on boards, tiles etc.
	2	Medium damage: significant breakage of materials or several small areas where material has been damaged revealing loose asbestos fibres.
	3	High damage or delamination of materials, sprays and thermal insulation. Visible asbestos debris.
Surface Treatment	0	Composite materials containing asbestos: reinforced plastics, resins, vinyl tiles.
	1	Enclosed sprays and lagging, AIB (with exposed face painted or encapsulated), asbestos cement sheets etc.
	2	Unsealed AIB, or encapsulated lagging and sprays.
	3	Unsealed lagging and sprays
Asbestos Type	1	Chrysotile
	2	Amphibole asbestos excluding Crocidolite
	3	Crocidolite

#### Material Risk

Material Assessment Score	Risk Level
10 or higher	High
7 - 9	Medium
5 - 6	Low
4 or lower	Very Low



Priority Assessment Algorithm (PA)

Likelihood of Disturbance

Variable	Score	Category
<b>Normal occupant activity</b> Main type of activity in area  Secondary Activities	0	Rare disturbance activity (e.g. little used store room)
	1	Low disturbance activities (e.g. office type activity)
	2	Periodic disturbance (e.g. industrial or vehicular activity which may contact ACMs.)
	3	High levels of disturbance (e.g. Fire door with AIB sheet in constant)
	As Above	As Above
<b>Likelihood of Disturbance</b> (Average of the 3 scores) Location  Accessibility  Extent/Amount	0	Outdoors
	1	Large rooms or well-ventilated areas
	2	Rooms up to 100m <sup>2</sup>
	3	Confined spaces
	0	Usually inaccessible or unlikely to be disturbed
	1	Occasionally likely to be disturbed
	2	Easily disturbed
	3	Routinely disturbed
	0	Small amounts or items (e.g. strings, gaskets)
	1	More than 10m <sup>2</sup> or 10m pipe run
	2	Between 10 and 50 m <sup>2</sup> or 10 and 50m pipe run
	3	More than 50m <sup>2</sup> or 50m pipe run
<b>Human Exposure</b> (Average of the 3 scores) Number of occupants  Frequency of use  Average time area in use	0	None
	1	1-3
	2	4-10
	3	More than 10
	0	Infrequent
	1	Monthly
	2	Weekly
	3	Daily
	0	Less than 1 hour
	1	Between 1 and 3 hours
	2	Between 3 and 6 hours
	3	More than 6 hours
<b>Maintenance Activity</b> (Average of the 2 scores) Type of maintenance activity  Frequency of maintenance activity	0	Minor disturbance (e.g. possibility of contact when gaining access)
	1	Low disturbance (e.g. changing light bulbs in AIB ceiling)
	2	Medium disturbance (e.g. lifting one or two AIB ceiling tiles to access a valve)
	3	High levels of disturbance, (e.g. removing a number of AIB ceiling tiles to replace a valve or for recabbling).
	0	ACM unlikely to be disturbed for maintenance
	1	Less than or equal to 1 per year
	2	More than 1 per year
	3	More than 1 per month

Risk Score

Management Priority

Risk Score (MA + PA)	Risk Level
18 or higher	High
13 - 17	Medium
8 - 12	Low
7 or lower	Very Low

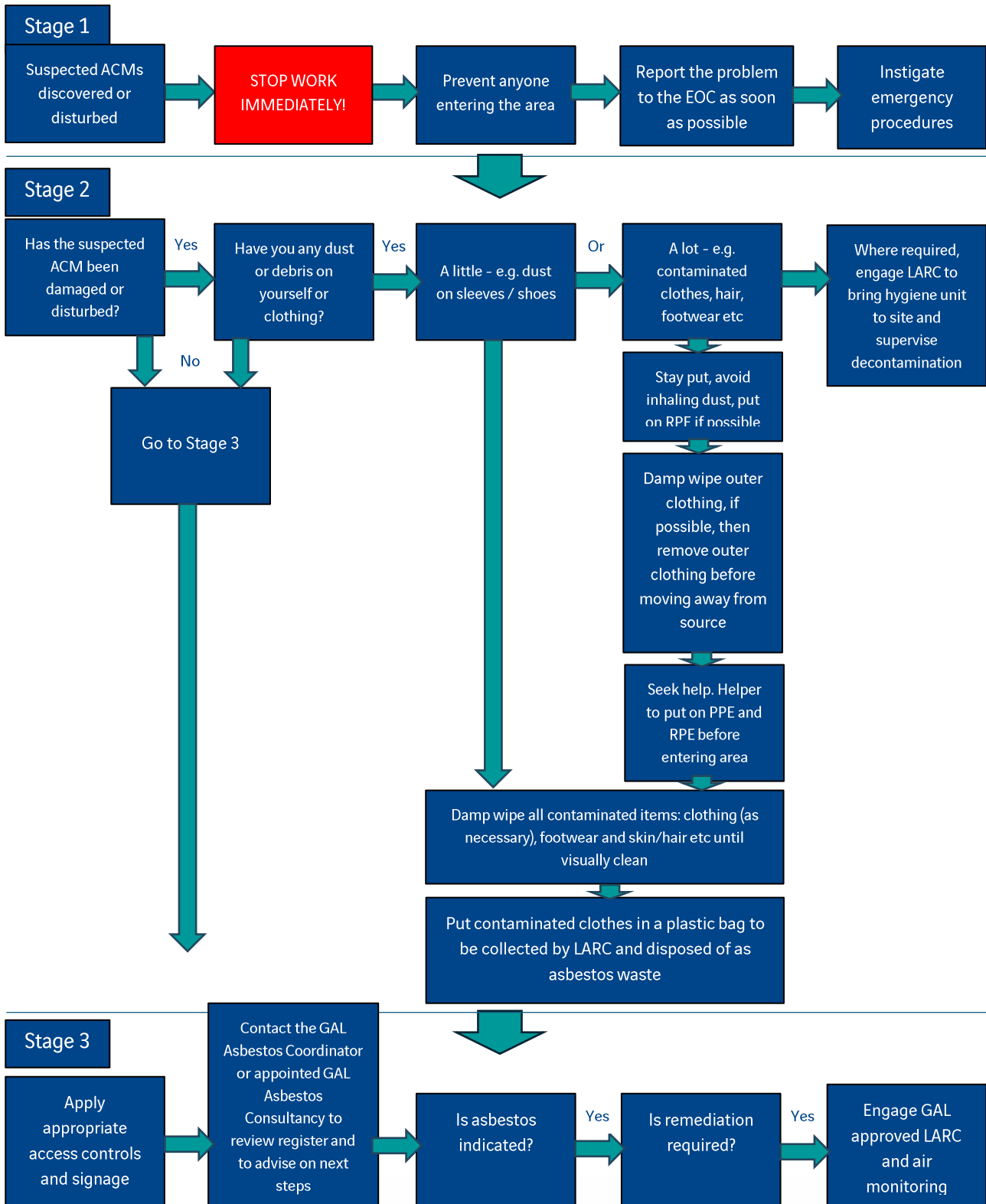


16.4 Appendix D: Labels and Signs



## 16.5 Appendix E: Emergency Plan

Adapted from HSG210 – Asbestos Essentials (EM1)





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## 16.6 Appendix F: Terminology and Definitions

A full list will be available on the Engineering – Asbestos SharePoint

Term	Description/Definition
<b>Asbestos Register</b>	TEAMS Enterprise Portal containing the location, condition, and risk scoring of known and presumed ACMs throughout the Airport
<b>Asbestos Management Contractors</b>	The collective name for the Asbestos Survey, Asbestos Remediation and Air Monitoring Contractors
<b>Commercial</b>	Property, Retail and Surface Access
<b>Dutyholder</b>	The dutyholder is the person or organisation responsible for the maintenance of a building (or part thereof), land or structure.
<b>Demolition Survey</b>	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.
<b>Gatwick Airport Limited (GAL) employees</b>	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.
<b>Licensable Works</b>	<p>Higher risk Asbestos remediation works that must be carried out by an HSE licensed contractor.</p> <p>Licensable work with asbestos is work:</p> <ul style="list-style-type: none"> <li>where worker exposure to asbestos is not sporadic and of low intensity; or</li> <li>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</li> <li>on asbestos coating; or</li> <li>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.</li> </ul> <p>All licensable work must be notified to the appropriate enforcing authority using the ASB5 form at least 14 days before the work starts.</p>
<b>Management Survey</b>	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.



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<b>Non-Licensed Works</b>	<p>Lower risk Asbestos remediation works that do not require an HSE licensed contractor (although they must still be competent and have appropriately trained operatives.)</p> <p>To be exempt from needing a license the work must be:</p> <p>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</p> <p>Conducted 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> <p>Meet at least one of the four following conditions:</p> <p>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</p> <p>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</p> <p>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</p> <p>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.</p> <p>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>
<b>Refurbishment Survey</b>	<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>
<b>Reinspection</b>	<p>Annual condition inspection of all known and presumed ACMs within a building or site.</p>
<b>Works</b>	<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>



16.7 Appendix G: Acronyms and Abbreviations

A full list will be available on the Engineering – Asbestos SharePoint

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
CSC	Contractor Support Centre
EA	Environment Agency
EOC	Engineering Operations Centre (formerly CSC)
EOM	Engineering Operations Manager
EDMS	Engineering Data Management System (Meridian/Portal)
GAL	Gatwick Airport Limited
GAL HSE	Health, Safety and Environment Department
HSE	Health and Safety Executive
LARC	Licensed Asbestos Removal Contractor
LGW	London Gatwick Airport
UKAS	UK Accreditation Service