

# **Southside**

## **HOUSING ASSOCIATION**

### **Asbestos Management Policy**

**Issued: February 2019**

**Reviewed: February 2022**

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## **1. Purpose**

- 1.1. To effectively manage all asbestos containing materials across the Association's property portfolio and to reduce the asbestos related risks to as low a level as is reasonably practicable.
- 1.2. To ensure asbestos works is properly scoped, serviced and managed in accordance with legal requirements and best practice.

## **2. References**

- Health & Safety at Work Act 1974;
- Management of Health & Safety at Work Regulations 1999;
- Control of Asbestos Regulations 2012;
- L143 - Managing and Working with Asbestos - Control of Asbestos Regulations 2012. Approved Code of Practice and Guidance;
- INDG223 - Managing asbestos in buildings: A brief Guide;
- HSG264 - Asbestos: The survey Guide;
- HSG210 - Asbestos Essentials;
- Construction (Design and Management) Regulations 2015;

## **3. Asbestos Policy**

- 3.1. The presence of an asbestos containing material in itself does not constitute a danger. However, there is a potential risk to health if such material is disturbed and damaged. An isolated accidental exposure to asbestos fibres for a short duration is extremely unlikely to result in the development of asbestos related diseases.
- 3.2. Regular exposure – even at relatively low levels – can present a risk. As well as people employed in the building trades, inadvertent exposure (and consequent risk) can occur in other groups of people e.g. installers of burglar alarms, smoke detectors, etc.
- 3.3. Maintenance and repair contracts will also take place in the future and it is important, therefore, to have in place a management system which minimises the potential for exposure to asbestos.
- 3.4. Working with and managing asbestos materials is now very tightly regulated via a number of different Legislative provisions. The purpose of this Policy is to ensure that the Association complies with all current Legislation, Codes of Practice and Health and Safety Executive Guidance Notes.

## **4. Statement of Intent**

Southside Housing Association shall ensure that, as far as is reasonably practicable, no persons are exposed to risks to their health due to exposure to any asbestos containing materials that may be present in any of the properties it owns or occupies.

## **5. Policy Statement**

The Association's Asbestos Policy conforms to the Health and Safety at Work Act 1974, and the Control of Asbestos Regulations 2012. The Policy and Procedures will apply to all buildings and all individuals employed by the Association, and to consultants/contractors/subcontractors/suppliers engaged by the Association and to the Association's tenants.

5.1. Southside Housing Association's Policy on asbestos is to:

- Ensure the prevention of exposure to risks associated with asbestos containing materials;
- Ensure that any asbestos containing materials that may be present in any of its buildings are maintained in a condition so as to prevent the possibility of any harm to health occurring;
- Promote awareness of the risks from asbestos containing materials and the Association's Management Procedures through training and induction of relevant staff.
- Key staff involved in the delivery of this Policy will receive regular re-training;
- Provide adequate resources to ensure the provision of appropriate information, instruction and training;
- Ensure a commitment to comply with all relevant asbestos legislation, Approved Codes of Practice, Health and Safety Executive Guidance Notes and to commit to the safe disposal of any asbestos waste in accordance with the appropriate legislation;
- Ensure that a representative proportion of properties built pre 2000 are surveyed to identify any asbestos containing materials that may be present therein and to prepare and maintain an Asbestos Register for these buildings. This Register will be reviewed annually but will be updated after any treatment and/or removal works have been undertaken;
- Implement an effective asbestos management plan, in order that appropriate measures such as encapsulation, labelling, inspection, working with, or removal of, the material can be undertaken;
- Ensure that an appropriate system is installed, maintained and implemented for the management of all asbestos containing materials identified in the Register. Such a system is to be capable of recording the risk, the needs and priorities for treatment and/or removal;
- Ensure that all contractors and sub contractors engaged to carry out work on any of the Association's buildings are provided with a summary, listing all relevant premises that may contain asbestos which may be disturbed by their works;
- Ensure that information regarding the presence of asbestos is contained in tender documentation as may be appropriate;
- Ensure Licensed Contractors and/or Sub Contractors carry out ALL Asbestos Major Works in accordance with HSE recommendations;
- Ensure all Non – Licensed Contractors carrying out Asbestos Minor Works are trained in safe working procedures and have appropriate insurance cover for the work being carried out;
- Ensure that relevant staff, as identified by a Training Needs Analysis, of the Association and contractors have appropriate training in this Policy and these Procedures;
- Regularly review the Asbestos Management Policy and Procedures;

## **6. Roles and Responsibilities**

- 6.1. Southside Housing Association has responsibility for compliance with The Health and Safety at Work etc. Act. (1974) and all associated legislation. This includes specific legislation relating to asbestos, as set out in Section 2.
- 6.2. This Asbestos Policy and Procedures document should be read in the context of the Association's Corporate Health and Safety Policy.
- 6.3. The Director has overall responsibility for ensuring compliance with all current asbestos regulations, guidance notes and codes of practise. They will be responsible for:
  - Ensuring the Association has a competent Asbestos Policy, Procedures and Management System;
  - Ensuring that the Policy, Procedures and Management System are updated regularly to reflect changes in legislation and/or good working practises;
  - Ensuring that all staff are familiar with the contents of this document, and of their responsibilities under the Management System;
- 6.4. The Head of Housing Services will be responsible for:
  - Implementation of this Policy and Procedures;
  - Maintaining an effective asbestos management plan, as detailed in this document;
  - Periodically reviewing and updating this document;
  - Reporting on the effectiveness of the Policy and Procedures to the Director and the Management Committee;
  - Acting immediately if any serious deficiencies are identified in any area of this document;
- 6.5. The Maintenance Manager will be responsible for:
  - Ensuring that the Asbestos Register is updated on completion of any works on asbestos containing materials;
  - Organising regular audits of the Asbestos Register;
  - Providing information on asbestos containing materials, as appropriate;
  - Reporting any incident of alleged asbestos exposure and carry out any required investigation. Also, where appropriate, ensuring the correct reporting of incidents under RIDDOR (Reporting of Injuries, Diseases and Dangerous Occurrences Regulations);
  - Providing the Health and Safety Executive with details of asbestos management procedures if/when requested;
  - Promoting awareness of the hazards of asbestos containing materials and the Association's Asbestos Management Procedures by advising on appropriate training and induction, in liaison with Administrative, Technical and Management staff;
  - Monitoring to ensure that all Staff know of their responsibilities under this policy;
  - Maintaining a current list of approved HSE Asbestos Licensed Contractors and UKAS accredited asbestos testing/survey;
  - Ensuring that all the Association's regular local contractors are aware of this Policy and these Procedures;

6.6. The Asbestos Co-ordinator will be responsible for:

- Developing and maintaining an asbestos register of all current properties;
- Programming surveys in the Association's premises to identify any asbestos containing materials that may be present and to prepare and maintain an Asbestos Register for each building;
- Ensuring that adequate reviews of surveyed premises are carried out and that asbestos registers are updated accordingly;
- Ensuring the asbestos register is updated whenever asbestos removal or remediation work is carried out;
- Collating copies of all test certificates, Certificates of Reoccupation, evidence of correct waste disposal within 10 (ten) working days of the completion of the work;

6.7. The Head of Development will be responsible for:

- Ensuring that development activities are carried out in accordance with the requirements of this Policy, Association's asbestos management procedure and requisite legislation, guidance notes and ACOPs;
- Including but not limited to, ensuring that before any feasibility work or project work is commenced the Asbestos Register is consulted and information obtained on any asbestos containing materials within the premises;
- If there is no asbestos register for the premises then the Head of Development is responsible for organising asbestos surveys as required;
- Ensuring that where asbestos is identified within a development project, appropriate actions are undertaken to remove all asbestos in accordance with the requisite standards;
- Ensure that confirmation is provided to the Asbestos Co-ordinator on or before handover of properties, that no asbestos risk remain within development properties;

6.8. The Maintenance, Asset and Service Officers will be responsible for:

- Ensuring that before any work is started on Association premises that the Asbestos Register has been consulted. If no asbestos is identified then the works can proceed with caution, bearing in mind the possible presence of asbestos containing materials not identified in the Asbestos Register;
- Halting any works and informing staff if suspected materials are discovered during the course of the works and immediately seeking advice from the Maintenance Manager;
- Ensuring that only HSE asbestos licensed contractors and UKAS accredited testing organisations from the Association's Approved List are used for Asbestos Major Works;
- Ensuring that separate contracts are issued for asbestos remediation works and subsequent asbestos testing/monitoring;
- Ensuring contractors are instructed to consult the Asbestos Register in order to familiarise themselves with the location of any known asbestos, non-accessible areas, or restricted areas in the premises;
- Ensuring copies of all test certificates, Certificates of Re-occupation, evidence of correct waste disposal are received from contractors within 10 (ten) working days of the completion of any work involving asbestos containing materials;
- Ensuring that information which could affect the asbestos register is passed to the Asbestos Co-ordinator within 3 (three) days of receipt;

6.9. The Concierge Staff will be responsible for:

- Ensuring that if work is instructed out of hours then the Asbestos Register must be inspected and any evidence of asbestos materials passed onto the contractor;
- Reporting such work to the Maintenance Manager as soon as possible during the next working day;

6.10. All persons employed by the South Side Housing Association will be responsible for :

- Ensuring that any work that may disturb or damage known asbestos containing materials is avoided;
- Reporting to the Maintenance Manager any materials suspected of containing asbestos, where the material has become disturbed and/or damaged;

6.11. Generally Contractors/Sub-Contractors and Suppliers will be required to:

- Ensure that they are fully familiar with current legislation relating to the management of Asbestos Containing Materials;
- Ensure that they have a clear understanding of the Association's Asbestos Policy and Procedures;
- Ensure that all staff employed by them have received an appropriate level of asbestos awareness training;
- Consult with any relevant asbestos registers that may be available for properties before starting work which will interfere with the fabric of a building;
- Ensure that where work may be affected by, or involves, asbestos containing materials that an approved asbestos licensed sub-contractor is engaged (unless the contractor himself is licensed) to carry out the work;
- Ensure that any relevant risk assessments, method statements, statutory notices are in place before work commences;
- To progress all works diligently but, if any suspect materials are encountered, to immediately suspend operations and to contact the Maintenance Manager for further instruction;
- Provide copies of all test certificates, Certificates of Reoccupation, evidence of correct waste disposal to the Asbestos Co-ordinator within 10 (ten) working days of the completion of the work;
- Contractors must ensure that Asbestos sub Contractors are approved by the Maintenance Manager before any order is placed or contract awarded;

6.12. Asbestos Removal Contractors & Sub-contractors will be responsible for:

- Ensuring that they have a current license from the HSE to work with the type of asbestos indicated;
- Ensuring that they have current and adequate insurance cover for the asbestos works to be undertaken;
- Ensuring working practises are in compliance with current legislation and all associated Approved Codes of Practice and Guidance Notes;
- Attending site to assess and prepare quotations against asbestos work specifications. The contractor or sub contractor must raise any issues relating to

- health and safety, or potential additional costs, on the project to the person setting up the works;
- Attending site meetings as may be required;
  - Providing a written Method Statement and Risk Assessments to the commissioning Officer and the Statutory Authority where necessary. The Risk Assessments and Method Statement must indicate the resources and timetable allocated to the project in accordance with *the Control of Asbestos Regulations 2012*. Emergency procedures must be discussed before work commences. The commissioning Officer may wish to discuss the Method Statement and Risk Assessments with the Maintenance Manager and/or any Asbestos Consultant retained by the Association;
  - Providing statutory notice to the Health and Safety Executive as may be required prior to the commencement of any asbestos related works or, by agreement with the Commissioning Officer, applying for a waiver against the minimum notice period. Copies of all such notices must be submitted to the commissioning Officer before work commences. The commissioning Officer may wish to discuss application for waiver with the Maintenance Manager and/or any Asbestos Consultant retained by the Association;
  - Carrying out their obligations under the contract, including maintaining high standards of safety and hygiene in asbestos works and all related work areas and supplying labour, materials and equipment of the highest standard, complete with all supporting documentation as may be required;
  - Arranging transport and disposal of asbestos waste materials in accordance with legislative requirements and providing copies of all Consignment Notes to the asbestos co-ordinator;
  - Carrying out regular inspection of the work environment. Any defects found, or any reported by the Association's representatives, must be immediately rectified;
  - Identifying to the commissioning Officer any additional elements of work which are necessary. Once agreed, the Method Statement must be updated accordingly;
  - Liaising with the appointed UKAS accredited asbestos testing organisation to ensure the satisfactory progress of the works;
  - Providing copies of all test certificates, Certificates of Reoccupation, evidence of correct waste disposal to the Asbestos Co-ordinator within 10 (ten) working days;

6.13. Asbestos Analysts, Surveyors and Asbestos Consultants will be responsible for:

- Maintaining, and demonstrating UKAS accreditation relevant to the requested task;
- Maintaining adequate insurance cover for the tasks to be undertaken;
- Providing support to the commissioning Officer, the Maintenance Manager, and/or the Asbestos Co-ordinator as may be required;
- When requested by the commissioning Officer, the Maintenance Manager, and/or the Asbestos Co-ordinator, reviewing and commenting on asbestos works such as: specifications, Contractor's and/or Sub Contractor's Method Statement, work procedures, etc;
- Carrying out analytical works and inspections as agreed with the commissioning Officer. Where site conditions alter, the analyst will be required to amend the level of testing and inspections to ensure that all information relevant to the continued health and safety of the Contractor and building occupants is obtained;
- Reporting to the commissioning Officer any defect or non-compliance relating to the Contractor's and/or Sub Contractor's performance including: suitability of the work

area, adherence to the Method Statement, Statutory Instruments, and the Association's Asbestos Policy and Procedures. Where senior Housing Association staff are not immediately available, the surveyor/analyst will be expected to take such measures as may be deemed necessary to ensure the health and safety of Contractors and Sub Contractors and building occupants. These actions must be reported to the commissioning Officer (who will then immediately inform the Maintenance Manager) as soon as reasonably practicable;

- Checking areas on completion of asbestos remedial works to ensure that the contractor has completed his scope of works and all affected areas have been left in a satisfactory condition;
- Carrying out air monitoring tests as may be required by the commissioning Officer or as identified in the Risk Assessment;
- Reporting to the commissioning Officer any aspects of asbestos management encountered on site which could give rise to health risks e.g. breaches of the Asbestos Policy and Procedures, suspect or damaged asbestos;
- Issuing formal reports, including Certificates of Re-occupation, to the Asbestos Co-ordinator set on completion of any site works;

## **7. Prohibition on Staff Handling Asbestos**

- 7.1. Unless properly trained to do so, no Association staff will be permitted to handle or work with asbestos containing materials (ACMs);

## **8. Identification of Suspect Material – Damaged, Disturbed or Previously Unidentified**

- 8.1. It is the responsibility of all staff to report to the Maintenance Manager if they suspect that disturbed or damaged asbestos containing materials may be present in a building owned or occupied by the Association. In a case where an accessible material is suspected of containing asbestos, and where this material may reasonably *become* disturbed, this would also apply.
- 8.2. In such cases, an external consultant having UKAS (United Kingdom Accreditation Service) accreditation for asbestos sampling and analysis, will be contacted to carry out identification.
- 8.3. If asbestos is identified within the sample, advice will be obtained from a competent consultant on the appropriate course of action.
- 8.4. Where damage to any material known to contain asbestos has taken place, and is likely to give rise to airborne respirable fibre release, the Maintenance Manager will arrange for isolation of the area pending an investigation. S/he will arrange for air monitoring tests (measurement of airborne fibre concentrations) to be carried out and sampling and analysis will be carried out by an independent UKAS accredited organisation to determine the level of any potential contamination, or to provide reassurance that unacceptable contamination has not occurred.
- 8.5. Details of air test results will be made available for inspection and record purposes.
- 8.6. Remedial action will be required when airborne fibre levels **exceed 0.01 f/cc**. The nature of the remedial work must be agreed with the Maintenance Manager.

8.7. When remedial action becomes necessary after exposure, the relevant facts may have to be reported to the HSE in accordance with the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR). (Advice may be sought from a competent Asbestos Consultant to determine whether the incident is in fact RIDDOR reportable.)

## **9. Asbestos Surveys and Management Plans – Normal Occupancy of Premises**

9.1. Where Association premises and common areas of housing stock were built or renovated prior to 2000, an Asbestos Management Survey programme will be carried out by a competent UKAS accredited asbestos management consultancy. (HSE expects that no asbestos containing materials would be in use from 2000.)

9.2. The surveyor and the Association should jointly determine an appropriate strategy to cost-effectively assess relevant premises, taking account of the permissibility of ‘representative’ surveying across properties of the same archetype and construction date.

9.3. Current legislation does not subject ‘domestic dwellings’ to the requirement for Asbestos Management Surveys (although Refurbishment and Demolition Surveys are required – see below). The Association will take a proactive approach to managing asbestos, and shall adopt a regime which includes undertaking Management Surveys to domestic dwellings.

9.4. The findings of all surveys undertaken will be used to prepare a Register of asbestos containing materials (including their location and condition along with details on how best to manage / remediate the material) in all relevant premises.

9.5. An asbestos management plan will be developed and implemented, ensuring that all asbestos containing materials are properly managed. This will include procedures for re-inspecting materials and carrying out remedial works where necessary.

9.6. The “Asbestos Co-ordinator” will be responsible for maintaining the Registers, organising surveys and re-inspections, etc.

## **10. Asbestos Surveys – Prior to Work on Premises**

10.1. Prior to any work being carried out on the fabric of (pre-2000) buildings, the asbestos register will be interrogated to determine whether asbestos may be encountered and appropriate precautions (including the use of HSE licensed contractors where necessary) will be taken. Where the works are likely to disturb material not included in the registers (e.g. behind wall panels, within voids, etc.), 8.2 will apply.

10.2. Prior to any refurbishment, demolition or repair works on building fabric, which is not known to be asbestos free, a competent UKAS accredited asbestos management consultancy will be commissioned to carry out a ‘Refurbishment or Demolition’ (i.e. intrusive) asbestos survey of the area to be worked upon.

10.3. The surveyor and the Association should jointly determine an appropriate plan to cost-effectively assess relevant premises, taking account of the permissibility of ‘representative’ surveying across properties of the same archetype and construction date.

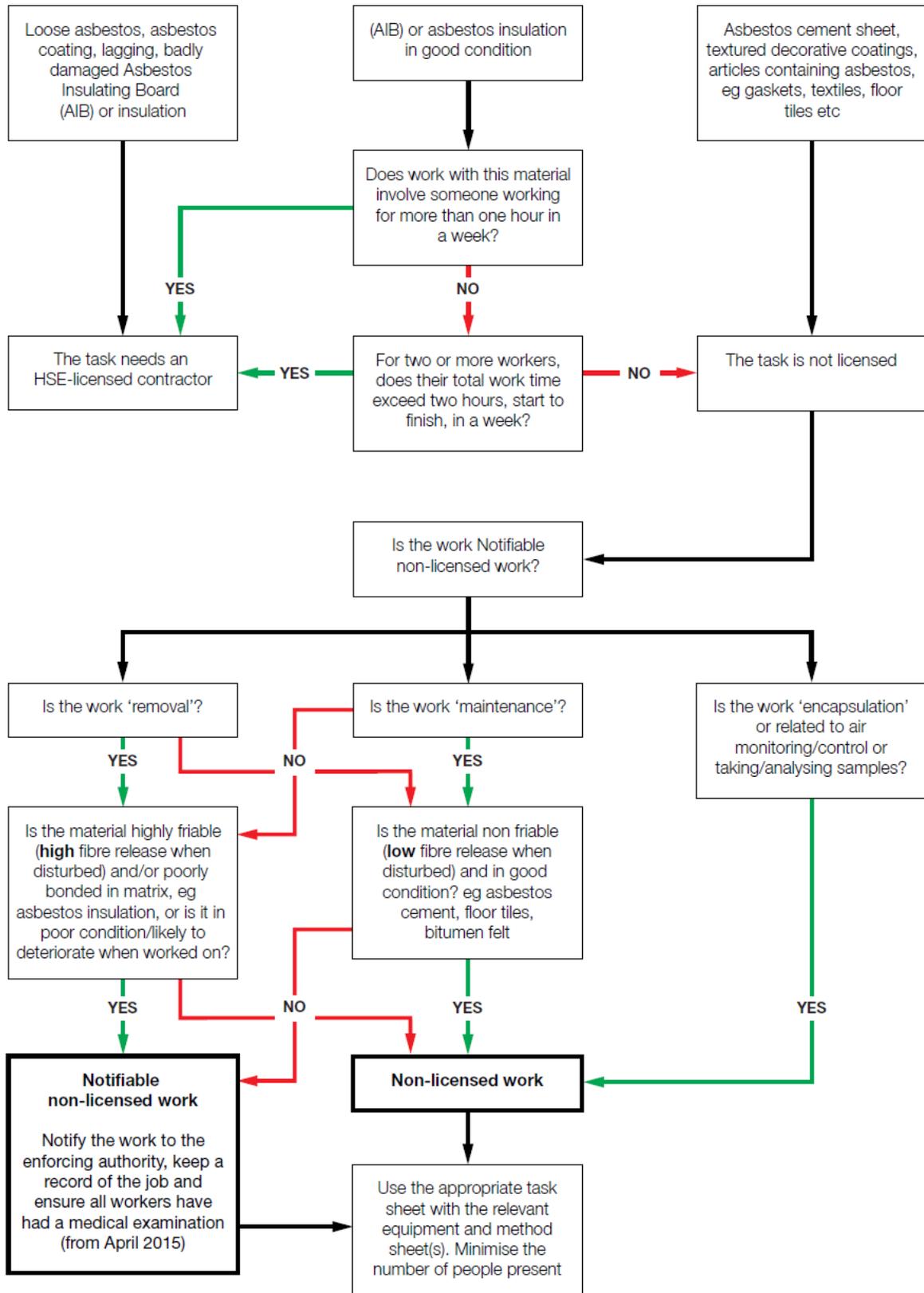
- 10.4. Prior to works starting, the information obtained from Refurbishment/ Demolition Surveys will be issued and discussed with the proposed works contractor to ensure that ACM's will not be disturbed by their works.
- 10.5. In the event that works would have the potential to disturb ACM's, appropriate measures will be taken, including the prior removal of ACM's, amendments to work programme, etc.
- 10.6. Records of all surveys and discussions with contractors will be retained in the project files to demonstrate that asbestos was properly considered and appropriate actions taken to prevent disturbance and exposure.

## **11. Work with Asbestos Materials**

- 11.1. Most work likely to disturb or remove asbestos must be carried out by an HSE licensed asbestos removal contractor and notified to the HSE 14 days prior to commencement.
- 11.2. However, the Control of Asbestos Regulations 2012 does allow work with certain lower risk asbestos containing materials (e.g. asbestos cement and asbestos textured coatings) to be carried out by non-licensed personnel and without notification to the HSE. The three categories of asbestos work are:
  - Major Works: Licensed works – 14 day notification and licenced contractor (highest risk work);
  - Minor Works: Notifiable non-licensed works – notification before works start and competent (non-licensed) contractor;
  - Minor Works: Non-notifiable non-licensed works – no notification and competent (non-licensed contractor);
- 11.3. The following HSE flowchart shows the decision making process on appropriate classification of works:

## Decision flow chart

Use this simple flow chart to help you decide who needs to do the work:



- 11.4. Where any doubts exists over the correct classification or scope of asbestos works, advice will be sought from a competent UKAS accredited asbestos management consultancy prior to any works being carried out on asbestos containing materials.
- 11.5. The Association may also appoint a competent Asbestos Project Management consultancy to scope, specify, tender and project manage asbestos contracts.
- 11.6. Where work does not require to be carried out by licensed contractors (i.e. Minor Works) it will, nevertheless, be undertaken in a safe manner, by appropriately trained personnel, reducing the generation of airborne dusts to as low a level as is reasonably practicable.
- 11.7. All method statements and risk assessments for such work will be screened by a competent person prior to work commencing.
- 11.8. Where licensed contractors are required to carry out asbestos works, the following documentation will be requested from the contractor prior to commissioning, and copies kept in the job file:
- Current asbestos licence check on HSE website;
  - Insurance certificate indicating the insured is covered for asbestos work;
  - A representative sample of medical examination certificates (conducted by an Employment Medical Advisory Service registered doctor) for personnel who will work on the job;
  - A representative sample of training records for all personnel who will work on the job (asbestos management and handling courses), usually provided by a United Kingdom Asbestos Training Association (UKATA) member;
  - Where applicable, notification of the job to the HSE 14 days prior to commencement;
  - Method statement and risk assessment for the job (Plan of Work);
- 11.9. At the conclusion of all asbestos works (unless included within an Asbestos Project Management package), the Association will directly appoint a UKAS accredited Asbestos Analyst to carry out the required level of inspection and test.
- 11.10. For licensed works this will include a '4-stage clearance test' and for minor works this will include a visual inspection and reassurance air test. Care will be taken to ensure this is EXCLUDED from the contractor's initial proposal and price.

## **12. Tenant Information and Work Procedures**

- 12.1. The Association will ensure that a procedure is implemented, for pre-2000 housing stock, which informs tenants of the possibility of ACM's and on the requirements for undertaking work on their dwellings. This process as a minimum will include:
- Annual asbestos awareness article within newsletter;
  - Tenant information at sign up of new tenancies, tenants handbook;
  - Targeted communications as required or as a consequence of events;

- 12.2. Prior to a tenant starting work which will interfere with the fabric and/or services of a property, tenants will be required to seek advance permission from the Association.
- 12.3. Before issuing permission, the Asbestos Register will be consulted and, where ACM's are identified within the proposed work zone the Maintenance Team will liaise with the tenant to ensure all appropriate actions are taken.
- 12.4. Where the asbestos data is inconclusive (e.g. where a Refurbishment Survey has not been carried out, the Association will review the request and decide whether to refuse permission or to arrange for a Refurbishment Survey to be carried out.
- 12.5. In the event that tenants' works are liable to disturb ACM's, the Association will make a decision on the appropriate course of action, ensuring that all asbestos works are subject to the normal asbestos work procedures of the Association.

### **13. Equality and Diversity**

- 13.1. All involved will recognise their ethical and a legal duty to advance equality of opportunity and prevent discrimination on the grounds of; age, sex, sexual orientation, disability, race, religion or belief, gender reassignment, pregnancy and maternity, marriage and civil partnership.

### **14. Publicising this Policy**

- 14.1. The policy relating to asbestos will be publicised on the Association's Website.

### **15. Policy Review**

- 15.1. The Association will review this policy every 3 years, more regular reviews will be considered where, for example, there is a need to respond to new legislation/policy guidance.
- 15.2. Reviews will incorporate changes to legislation and regulations, tenant feedback and good practice.