

Organisational Policy

Asbestos Management Policy

Our Commitment

Argyll Community Housing Association is committed to provide equal opportunities across all services and to avoid discrimination. This policy is intended to assist ACHA to put this commitment into practice. Compliance with this policy should also ensure that employees do not commit unlawful acts of discrimination.

This policy can be made available in other formats, for example in large print, audio-format or Braille: the document may also be available in other languages, in full or summary form, as appropriate.

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1.0 Context

- 1.1 Asbestos is the single greatest cause of work-related deaths in the UK. Argyll Community Housing Association (ACHA) is committed to achieving the highest possible standards in safety, services, accommodation and customer care that we provide to our customers.

This Asbestos Management Policy supports the repairs & maintenance policy and the void management policy by establishing minimum required standards in line with all current health & safety legislation and good practice guidelines.

Large amounts of asbestos-containing materials (ACMs) were used for a wide range of construction purposes in new and refurbished buildings until 1999 when all use of asbestos was banned. This extensive use means that there are still many buildings in Great Britain which contain asbestos. Where asbestos materials are in good condition and unlikely to be disturbed they do not present a risk. However, where the materials are in poor condition or are disturbed or damaged, asbestos fibres are released into the air, which, if breathed in, can cause serious lung diseases, including cancers.

2.0 The Law and Good Practice

- 2.1 External references

Legislation and Regulation

- Health & Safety at Work Act 1974
- Control of Asbestos Regulations 2012

Guidance

- HSG264 Asbestos: The Survey Guide
- EM1 Asbestos Essentials
- RR783 Evaluation of the Duty to Manage Asbestos

- 2.2 Internal references

- Void management policy
- Repairs & Maintenance policy
- No Access policy
- Asbestos Management Policy

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- 2.3 The Health & Safety Executive publication, Asbestos: The Survey Guide (HSG264) deals with the specific responsibilities for managing the risks from asbestos in non-domestic premises under regulation 4 of the Control of Asbestos Regulations 2012 (CAR 2012). It is also designed to provide guidance where surveys may be carried out for other purposes such as ‘managing’ asbestos in domestic premises under wider Health & Safety legislation.
- 2.4 These Regulations place responsibilities on Duty Holders, Employers, Surveyors and those who commission surveys as well as Landlords. ACHA duty holders are identified in appendix 1 of this document.

The requirements placed on the duty holder/s are to ensure that,

1. All reasonable steps are taken to determine the location of materials likely to contain asbestos;
 2. All suspicious materials are presumed to contain asbestos, unless there are good reasons not to do so;
 3. A written record of the location of the ACMs and presumed ACMs is made and maintained.
 4. The condition of ACMs and presumed ACMs is assessed and monitored annually;
 5. The risk of exposure from ACMs and presumed ACMs is assessed and a written plan of the actions and measures necessary to manage the risk (ie the ‘management plan’) is prepared; and
 6. All necessary steps are taken to see that these actions are carried out.
- 2.5 To help comply with the legal requirements and to ensure that ACMs in premises are properly managed, duty holders should identify a person (and in some cases a deputy) within their organisation who will be responsible for that management. An appointed person will be essential where the duty holder has a large or complex building portfolio. The appointed person will need the resources, skills, training and authority to ensure that the ACMs are managed effectively. Part of their responsibilities will include managing the survey, including contractual and reporting arrangements, quality and subsequent use of the data.

For the purposes of this policy, the Chief Executive of ACHA has entrusted the responsibility of specific duties concerning Asbestos Management to Senior Staff members who play a role in delivering the association’s Health & Safety requirements as described in Appendix 1 – “Management structure”.

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2.6 To Manage the risks from ACM's the duty holder will:

1. Keep and maintain an up-to-date record of the location, condition, maintenance and removal of all ACMs on the premises;
2. Repair, seal or remove ACMs if there is a risk of exposure due to their condition or location;
3. Maintain ACMs in a good state of repair and regularly monitor their condition;
4. Inform anyone who is liable to disturb the ACMs about their location and condition;
5. Have arrangements and procedures in place so that work which may disturb the ACMs complies with CAR 2012; and
6. Review the plan at regular intervals and make changes if circumstances change.

2.7 Asbestos Survey – in most cases an asbestos survey will:

- i. As far as reasonably practicable locate and record the location, extent and product type of any presumed or known ACMs;
 - ii. Inspect and record information on the accessibility, condition and surface treatment of any presumed or known ACMs;
 - iii. Determine and record the asbestos type, either by collecting representative samples of suspect materials for laboratory identification, or by making a presumption based on the product type and its appearance etc.
- iv. Example survey sheet – (appendix 3)
- v. Different types of survey may be required depending on the nature or location of any ACM contained within a property or depending on the intended work activity.
- a) Management Survey – this is a standard survey. The intention here is to locate, where possible, the presence or extent of any suspected ACM's in our properties that could be disturbed or damaged during the life cycle of a tenancy. These surveys may include minor intrusive investigation work and minimum disturbance.
 - b) Refurbishment & Demolition Survey – this type of survey is required before any refurbishment or demolition work is undertaken. It is used to locate and describe all ACM's in a property where refurbishment or demolition work is planned. This survey is potentially fully intrusive and/or destructive, to allow access for inspection to all targeted areas.

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For a full description of each type of survey, refer to HSG264 document, sections 40 – 69.

2.8 The association has established an Asbestos Safety Management System (Appendix 2) that:

- Identifies key senior managers with overall responsibility for ensuring that asbestos management policy implementation and ongoing policy development is carried out.
- Establishes responsibilities of individual managers in relation to both employers and landlord's duties where ACM's are present in premises under their control.
- Commits senior managers to the provision of appropriate financial resources to ensure that annual asbestos inspection checks and maintenance are carried out.
- Includes detailed operational procedures and guidance for the following key functions:
 - i. Qualifying appointed contractors and their operatives
 - ii. Uniformity of documentation
 - iii. Gaining access
 - iv. Void house checks
 - v. Quality control & external audit
 - vi. Document Storage & retrieval
 - vii. Database management
 - viii. Asbestos Awareness training
 - ix. Emergency procedures
 - x. Further ACHA wide policy development

2.9 The enforcing authority for the Regulations is the Health & Safety Executive (HSE).

2.10 The Duty to Manage Asbestos:

Asbestos is a category 1 human carcinogen and is subject to a specific set of regulations, Control of Asbestos Regulations 2012 (CAR 2012). These regulations cover work with asbestos, prohibitions on the importation, supply and use of asbestos, and licensing of asbestos-removal activities. Regulation 4 of CAR 2012 contains an explicit duty on the owners and occupiers of non-domestic premises, who have maintenance and repair responsibilities, to assess and manage the risks from the presence of asbestos. The risks will vary with circumstances and can arise from normal occupation of a building or from inadvertent disturbance during the repair, refurbishment and demolition of premises. The risk assessment will be used

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to produce a management plan which details and records what actions to take to manage and reduce the risks from asbestos.

Every person who has, by virtue of a contract or tenancy, an obligation of any extent in relation to the maintenance or repair of non-domestic premises or any means of access or egress to or from those premises; or

In relation to any part of non-domestic premises where there is no such contract or tenancy, every person who has, to any extent, control of that part of those non-domestic premises or any means of access or egress to or from those premises.

3.0 Our Policy Objectives

3.1 The overall aim of the policy is to ensure the health, safety and wellbeing of all people in properties owned or managed by Argyll Community Housing Association (ACHA) which may have Asbestos Containing Material (ACM) within the fabric of any owned building or common parts of any multi-tenure building. We aim to protect the health, safety and welfare of the occupiers of our properties, tenants, visitors, staff, contractors and the general public as far as is reasonably practicable.

3.2 The purpose of this policy is:

- To ensure complete compliance with current legislation and best practice in accordance with the CAR 2012.
- To identify and manage all risks involved.
- To provide all relevant asbestos safety information and maintain dialogue with our customers and work pro-actively in conjunction with our contractors.
- To inspect and maintain all ACM's that ACHA are responsible for, in accordance with HSE publication HSG264
- To ensure all properties containing ACM's under our management comply with all relevant legal and health and safety requirements.

3.3 The prime objective of this policy is to ensure:

- The safety of all tenants, visitors, staff, contractors and the general public within ACHA owned or jointly owned properties.
- ACHA compliance with all appropriate Health & Safety legislation and codes of practice.
- Understanding of the duties placed on the association by the CAR 2012 regulations.
- Structured recording and monitoring processes, using the association's asbestos register, are in place for the management of all ACM's.

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3.4 The Chief Executive of ACHA is committed to ensuring that this Asbestos Management Policy will:

- Confirm the association's responsibilities and duties
- Confirm how the association will discharge its duties
- Confirm the standards required and accepted of any contractor acting on our behalf
- Confirm how ACHA staff will fulfil their responsibilities in monitoring ACM's within association owned properties.
- Confirm how ACHA will monitor contractors employed to assess and/or remove asbestos and how, as far as is reasonably practicable, these contractors fulfil their work commitments.
- Confirm that an Asbestos awareness and safety training plan is in place for appropriate staff

4.0 Implementing Our Policy Objectives

4.1 Management of Asbestos in Domestic Premises.

1. The 'duty to manage asbestos' requirements of regulation 4 of CAR 2012 do not normally apply to domestic premises. However, the requirements do apply to common parts of premises, including housing developments and blocks of flats, but do not place any direct duties on landlords for individual houses or flats. Examples of common parts would include foyers, corridors, lifts and lift shafts, staircases, boiler houses, vertical risers, gardens, yards and outhouses.
2. The Health and Safety at Work etc Act 1974, section 2, requires all employers to conduct their work so their employees will not be exposed to health and safety risks, and to provide information to other people about their workplace which might affect their health and safety. Section 3 places duties on employers and the self-employed towards people not in their employment and section 4 contains general duties for anyone who has control, to any extent, over a workplace. In addition, the Management of Health and Safety at Work Regulations 1999^s require employers to assess the health and safety risks to third parties, such as tenants who may be affected by their activities, and to make appropriate arrangements to protect them.
3. These requirements mean that organisations such as local authorities, housing associations, social housing management companies and others who own, or are responsible for, domestic properties, have legal duties to ensure the health and safety of their staff (and others) in domestic premises used as a place of work. As employers, the organisations also have duties under the

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general requirements of CAR 2012 to identify asbestos, carry out a risk assessment of work liable to expose employees to asbestos and prepare a suitable written plan of work.

4. ACHA have responsibility for a large numbers of properties which need a range of maintenance and repair work as well as general improvement and upgrading or occasionally demolition. Works can include electrical rewiring, structural repairs and alterations, replacement windows, central heating, insulation, renewal of bathroom and kitchen fittings or complete renovations. The work may be necessary on individual or small numbers of premises (e.g. emergency work due to fire/water/storm damage) or on large numbers where there are major improvement or upgrading schemes (e.g. the SHQS investment programme).

4.2 Duty Holder Responsibilities

- The Chief Executive retains overall responsibility for the implementation of this policy and all operations herein. These responsibilities have been distributed amongst staff who have a duty to perform in relation to the management of asbestos in ACHA properties. Please see Appendix 1.
- The Directors of Investment & Regeneration and Housing & Neighbourhood Services are responsible for ensuring that adequate resources are made available to enable the operational objectives of this policy within their directorate.
- Investment Manager & Regional Managers are responsible for policy and plan development, staff awareness & identification of the level of training required for each individual within their departments.
- Senior Planned Maintenance Officer is responsible for the daily operational delivery of this policy in reference to maintaining the association's Asbestos Register and ensuring it is updated with relevant information as soon as that information is available. It is also the Senior Planned Maintenance Officers responsibility to ensure the associations housing management system (Capita) is up dated with all relevant information.
- Senior Investment and Regeneration Officer is responsible for the daily operational delivery of this policy in reference to the Control of Asbestos within the association's properties where work is being undertaken through the association's Investment Programme & refurbishment works.

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- Repairs Managers I&R are responsible for the daily operational delivery of this policy in reference to supervision of all new installation works, repair and removal works highlighted through the annual inspection of ACM's within premises owned by the association and for performance monitoring reviews relating to the works being managed.
- Local Managers - Housing Management are responsible for the daily operational delivery of this policy as they manage staff who carry out Void house checks and may enter premises where ACM's are present or potentially present through the course of their work.

5.0 Performance Management

- 5.1 ACHA operates within a performance management framework which reports to and aims to meet the requirements of our tenants, Board of Management, the Scottish Housing Regulator and the Scottish Social Housing Charter.
- 5.2 As required by Section 31 of the Housing (Scotland) Act 2010, the Scottish Social Housing Charter sets out the standards and outcomes that all social landlords should aim to achieve when performing their housing activities:

- **Charter Ref.1 – Equalities**

Social landlords perform all aspects of their housing services so that:

- *Every tenant and other customer has their individual needs recognised, is treated fairly and with respect, and receives fair access to housing and housing services.*

- **Charter Ref.3 – Participation**

Social landlords manage their businesses so that:

- *Tenants and other customers find it easy to participate in and influence their landlord's decisions at a level they feel comfortable with.*

- **Charter Ref.4 – Quality of Housing**

Social landlords manage their business so that:

- *Tenants homes, as a minimum, meet the Scottish Housing Quality Standard (SHQS) by April 2015, and continue to meet it thereafter and are always clean, tidy and in a good state of repair when they are allocated.*

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5.3 This policy is supported by individual procedures put in place to comply with all of ACHA's responsibilities as far as asbestos safety is concerned. These procedures are:

- Ensuring qualifications of appointed specialist contractors and their operatives
- Correct documentation
- Gaining access
- Void house checks
- Quality control
- Document Storage & retrieval
- Database management
- Asbestos awareness training

5.4 Performance monitoring will be undertaken in key areas to assess the impact of the policy:

- Each property known to contain ACM's will be annually inspected to confirm condition/deterioration.
- Completion of necessary repair works within the time scales set out in the repairs and maintenance policy
- Development of planned repair, removal or encapsulation programmes of work

6.0 Development and training

6.1 Staff involved in the delivery, procurement and organisation of asbestos related work will be suitably qualified and trained.

6.2 All ACHA staff will undertake mandatory Customer Care and Diversity training.

6.3 We will ensure that all contractors working for us are qualified to carry out all work requested in a safe and appropriate manner.

7.0 Our positive action initiatives

None apply.

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8.0 Dealing with complaints

8.1 We value complaints and endeavour to use information from them to help us improve our services. If a tenant, factored owner or any other customer is unhappy with our repairs and maintenance service we will deal with the matter through our Complaints Handling Procedure.

9.0 Consultation and review procedures

9.1 This policy will be reviewed every three years or earlier if required due to substantive changes in legislation or regulatory requirements.

10.0 Confidentiality and data protection

10.1 All information relating to the tenant or factored owner provided by us to contractors or other third parties, will be done so only to fulfil the obligation of this policy.

10.2 We will ensure that we meet the requirements of the Data Protection Act 2002.

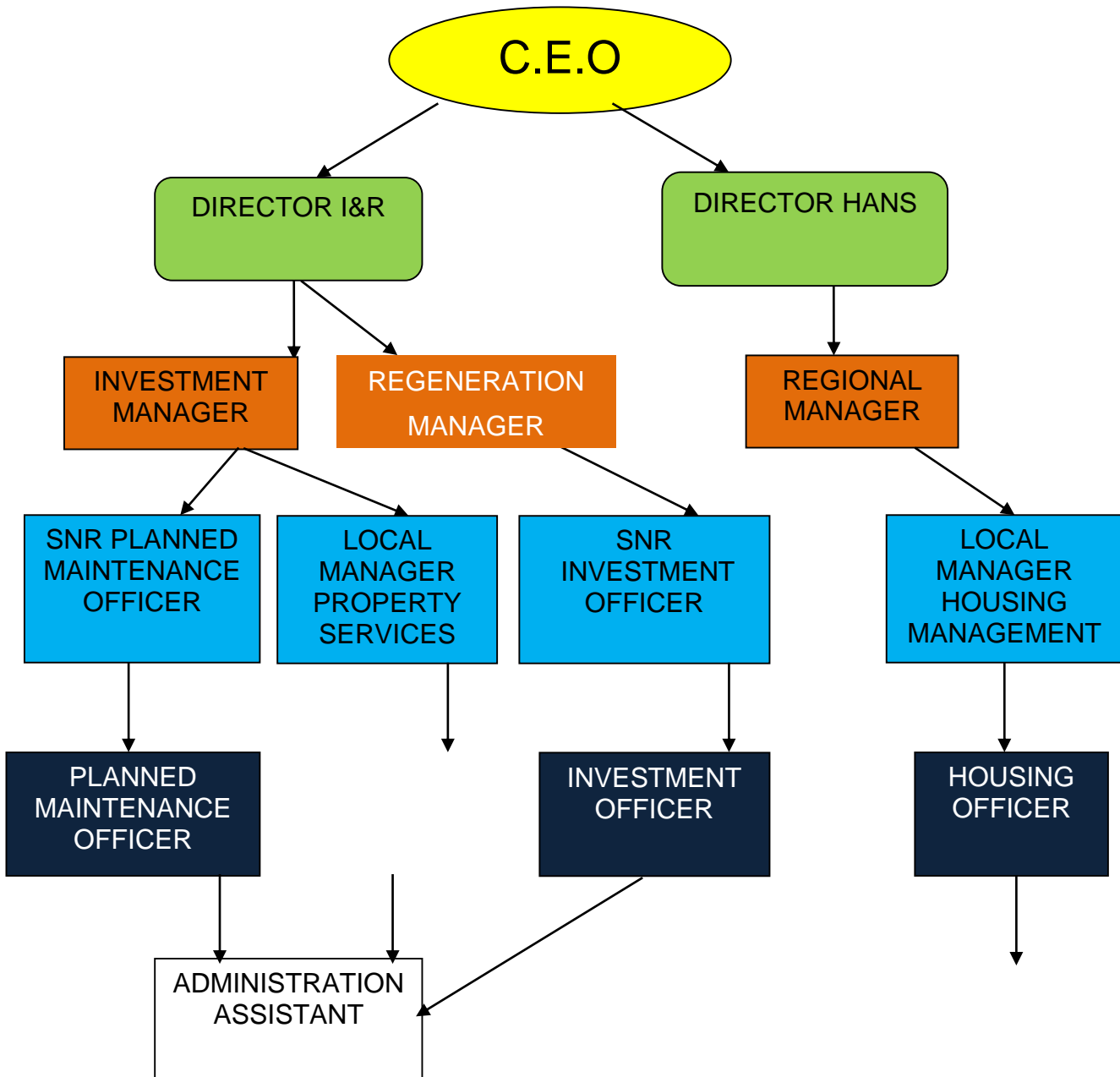
Policy Owner	Investment and Regeneration Department
Author	Lachlan Wood
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Appendix 1 - Management Structure

(incl. identification of posts with a need for asbestos awareness training).



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Appendix 2 - Asbestos Safety Management System

Qualifying successfully tendered contractors and their operatives

All contractors tendering for contracts that involve Asbestos works must, at tender stage, produce confirmation of current UKAS registration to ISO/IEC 17020 as a company before being employed to work on ACHA properties.

1. Uniformity of Documentation

All internal Inspections should be completed on the ACHA “Asbestos Management Survey Sheet”. This sheet identifies the area surveyed, Position of the ACM, Product type, Asbestos type, approximate quantity, product score (1-3, 1-Low risk, 2-Medium & 3-High), Asbestos type score (1-3), Surface score (1-3), Damage score (1-3), Material Risk Assessment score is an aggregate score of the previous four scores (0-12). The sheet also requires Location, Sample & Photograph numbers to be inserted. Confirmation of details on the register and Capita Housing Management System is requested. No changes will be made to the Capita housing management system unless conclusive proof of removal or that ACMs were never present.

All external contractor inspections and surveys must conform to the requirements of part 1 of this appendix.

2. Gaining Access

To gain access to any ACHA property that has asbestos, in order to complete the annual inspection, all the processes of the association’s agreed “No Access Policy” must be strictly adhered to.

3. Void House Checks

The association’s “Void Management Policy” should be followed to ensure all necessary asbestos checks and the procedure for completing these are strictly adhered to.

4. Quality Control

On submission of the relevant paperwork the appropriate Senior Staff member should complete checks on the quality of the submissions as far as completed sections are concerned.

For internal Management Surveys quality control will be done by the Senior Planned Maintenance Officer.

For external Management Surveys, quality control should be done by the commissioning officer. In addition to this, only contractors meeting the association’s pre-qualification requirements to carry out this type of work should be used.

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Refurbishment and Demolition Surveys should be treated in the same manner as external Management Surveys.

5. Document storage and retrieval

All Survey & Inspection paperwork will be stored electronically in the dedicated electronic house files managed by Investment & Regeneration. All repair records are stored within the association's Capita Housing Management System.

6. Database Management

The association's Planned Maintenance section employs and maintains the Asbestos Register. The Administration Assistant completes all updating of the register, the associations Capita Housing Management System and reports directly to the Senior Planned Maintenance Officer.

7. Asbestos Awareness Training

It is the responsibility of the Directors of Investment & Regeneration and Housing & Neighbourhood Services to ensure that adequate resources are available to facilitate the training of all staff with a role to play in the association's Asbestos Management & Safety procedures. An asbestos Safety and Training Plan has been developed in consultation with Human Resources and Corporate Services for the relevant staff and training.

It is the responsibility of the Investment Manager & Regional Managers to identify and ensure all necessary training is provided for those personnel within their departments that have a role to play in the association's Asbestos Safety procedures.

It is essential that all staff with a role to play in the association's Asbestos Safety procedures be trained to the appropriate standard.

8. Emergency Procedure

If it is suspected that an ACM has been disturbed and that asbestos fibres have accidentally been released, the following action will be taken immediately

- Evacuate the area without causing unnecessary alarm and cordon off / secure the area until a full assessment has been completed.

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- Report the incident immediately to the Health and Safety representative
- Record if possible, the names of all persons potentially affected.

9. ACHA wide policy development

The contents of this policy should be reviewed by all departments of the association. Following the departmental review process it is recommended that any ACHA wide policies owned by that department that the asbestos policy impacts upon, be amended or updated as necessary.

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Asbestos Management Survey

APPENDIX 3

Address: _____

Surveyor: _____

Date: _____



Area Surveyed	Position	Product	Asbestos Type	Approx Quantity	Surface	Damage	Material RA	Loc No	Sample No	Photo No
Living Room	Ceiling	Artex		30m ²	0	1	1			

Photos:

Asbestos product & type score card, used by surveying officer to assess the risk of the asbestos product & type dependant on assessment of use of material.

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Asbestos Survey

Material Risk Assessment

Sample Variable	Score	Examples of Scores
Product type (or debris from product)	1	Asbestos Reinforced composites (plastics, resins, mastics, roofing felts, vinyl floor tiles, semi-rigid paints)
	2	Asbestos Insulation Board, mill boards, other low density insulation boards, asbestos textiles, gaskets, ropes and woven textiles, asbestos paper and felt
	3	Thermal insulation (e.g. pipe and boiler lagging), sprayed asbestos, loose asbestos, asbestos mattresses and packing
Extent of damage/deterioration	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, asbestos insulation board (with exposed face painted or encapsulated), asbestos cement sheets etc
	2	Unsealed asbestos insulating board, or encapsulated lagging and sprays
	3	Unsealed lagging and sprays
Asbestos Type	1	Chrysotile (white least dangerous)
	2	Amphibole asbestos excluding crocidolite
	3	Crocidolite (blue most dangerous)