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ASBESTOS MANAGEMENT POLICY & PROCEDURE

YEARLY UPDATE

1 Introduction & Aim

- 1.1 The Asbestos Management Policy details how Nehemiah Housing fully complies with the Control of Asbestos Regulations (CAR) 2012. In addition to the policy Nehemiah have an Asbestos Management Plan that documents the controls in managing asbestos safely and an Asbestos Register which holds records of the assets with Asbestos Containing Material (ACMs).
- 1.2 Nehemiah Housing recognises that the main hazard in relation to asbestos is the non-identification of asbestos and the presence of ACMs and as such will protect those potentially exposed to asbestos as far as is reasonably practical by minimising the exposure using appropriate control measures and working methods. Nehemiah accepts that asbestos may be present in properties built prior to the year 2000 and will therefore manage these properties accordingly.
- 1.3 Nehemiah will follow a systematic approach to the management of asbestos to ensure it meets the requirements set out in the Control of Asbestos Regulations 2012 and other relevant legislation.
- 1.4 This is to ensure the safety of employees, tenants, contractors and other persons and stakeholders. This policy will be used to formulate the Nehemiah Asbestos Management Plan (AMP).

2. Policy Statement

- 2.1 Nehemiah recognises its duty to comply with the Control of Asbestos Regulations (CAR) 2012 and other relevant legislation. It is our objective to ensure that asbestos is managed safely by employees at all levels of the organisation and that they understand their duty, within each role, to appropriately contribute to the effective management of asbestos.
- 2.2 The key objectives of this policy are to establish:
 - The Duties of Employers and Landlords
 - Maintaining the Asbestos Management Plan
 - Competent Persons & Training
 - The Asbestos Register
 - Our Approach to Responsive, Voids and Planned Maintenance
 - Approach to Asbestos Remedial Work
 - Asbestos Information
 - Record Keeping
 - Dealing with non-compliance

3. Policy Principles

3.1 Detailed below are the key policy principles relating to asbestos management:

The duty to manage asbestos is included in the Control of Asbestos Regulations (CAR) 2012.

The duty requires Nehemiah to manage the risk from asbestos by:

Finding out if there is asbestos in the homes and buildings owned and managed by Nehemiah (or assessing if asbestos containing materials are liable to be present and making a presumption that materials contain asbestos, unless we have strong evidence that they do not), identifying its location and identifying what condition it is in. If the home or building was built prior to the year 2000 Nehemiah will assume asbestos is present. If the home or building was built after the year 2000 asbestos is unlikely to be present and no further action will be required.

- Making and keeping an up-to-date record of the location and condition of the asbestos containing materials or presumed asbestos containing materials in the homes and buildings owned and managed by Nehemiah.
- Assessing the risk from the ACMs found.
- Preparing a plan that sets out in detail how Nehemiah is going to manage the risk from the ACMs.
- Reviewing and monitoring the plan and the arrangements made to put it in place; and
- Setting up a system for providing information on the location and condition of ACMs to anyone who is liable to work on or disturb these materials.

3.2 Duties of Employers and Landlords

3.2.1 In order to comply with the Control of Asbestos Regulations (CAR) 2012 and other relevant legislation relating to asbestos Nehemiah will:

- Appoint competent Responsible Person(s) to coordinate the management of asbestos.
- Take reasonable steps to find materials likely to contain asbestos.
- Presume materials contain asbestos, unless there is strong evidence to support that the material is not ACM.
- Assess the risk of likelihood of anyone being exposed to asbestos from these materials.
- Make a written record of the location and condition of ACMs and presumed ACMs and keep it up to date.
- Repair or remove any material that contains or is presumed to contain asbestos, if necessary, because of the likelihood of disturbance or its location or condition.

- Prepare a plan that manages the risk and put into effect to ensure that Information on the location and condition of ACMs is given to people who may disturb them and any material known or presumed to contain asbestos is kept in a good state of repair.
- Monitor the condition of ACMs and presumed ACMs; and
- Review and monitor the management plan and the arrangements made to put it in place.

3.3 The Asbestos Management Plan

The Asbestos Management Plan should be read in conjunction with the Asbestos Policy. The plan details the measures that are in place to identify, manage and/or mitigate risks associated with asbestos. The Asbestos Management Plan is relevant for maintaining a safe environment for all tenants, employees, and contractors. It is designed to be a 'live document' that is to be regularly reviewed, amended, and updated as changes happen within the organisation and its operating processes.

The Asbestos Policy and Asbestos Management Plan will assist Nehemiah in ensuring compliance with asbestos in accordance with the Control of Asbestos Regulations (CAR) 2012.

When asbestos is found in a property, it will be the responsibility of the surveyor covering that patch to ensure that an asbestos management plan is completed and all information is readily available on our Housing Management system. This will help with allow contractors, surveyors and the tenant to be aware and not to damage the asbestos. Appendix 1 shows an example of the Asbestos Management Plan.

3.4 Competent Persons & Training

- Employees who have direct, or potentially indirect, contact with asbestos materials will complete Asbestos Awareness Training.
- Nehemiah will ensure that competent (UKAS accredited) contractors and surveyors are procured and appointed to undertake asbestos management surveys on its. HSE strongly recommends the use of accredited contractors and surveyors (UKAS accredited). The compliance team have the responsibility to check the competency of contractors and surveyors on an annual basis.
- Nehemiah will ensure that competent licensed asbestos removal contractors (LARC) are procured and appointed for all notifiable non-licensed work or licensed works. The Property Services team with responsibility to check the relevant qualifications of employees working for these contractors before appointed to carry out any works.

3.5 Asbestos Register

Nehemiah current holds an excel spreadsheet with all the information on properties that have had an asbestos survey carried out. This spreadsheet will now be transferred to the new Housing Management System. If a property has asbestos containing material (ACM) the asbestos management plan will identify the location and date of the next inspection.

Nehemiah aims to ensure all properties built before 2000 have an asbestos survey carried out. Currently we have nine hundred and forty-nine (949) properties built before 2000. One hundred and seventy (170) asbestos surveys have been completed.

Out of those sixty-one (61) contain confirmed or presumed asbestos, and an asbestos management plan will be put in place.

A survey therefore needs to be carried out on seven hundred and seventy-nine (779) properties and we are liaising with the asbestos contractor, who has advised that realistically they can carry out one hundred and fifty (150) surveys per year. We estimate that in 5 years' time all our properties will have had an asbestos survey carried out.

3.6 Responsive, Void and Planned Maintenance Works

Non-Domestic Properties (communal)

Nehemiah will review existing asbestos management survey information prior to carrying out any responsive, void or planned maintenance works which may involve working on or adjacent to any ACMs within a non-domestic (communal) property. This is to ensure that any ACMs likely to pose a risk are identified prior to works commencing and the details passed onto the relevant in-house operatives or external contractors and managed in an appropriate way.

Nehemiah will ensure that all non-domestic (communal) properties in ownership or management have an asbestos management survey if required before any destructive works are carried out.

3.7 Domestic Properties

Nehemiah will review the asbestos register and any existing asbestos survey information prior to carrying out any responsive, void or planned maintenance works which may involve working on or adjacent to any ACMs within a domestic property. This is to ensure that any ACMs likely to pose a risk are identified prior to works commencing and are managed and dealt with appropriately. Where intrusive works is to be undertaken a Refurbishment and Demolition survey (R&D) will be undertaken

Where there is no record of asbestos related information for a domestic property, a survey will be undertaken ahead of any works taking place should the contractor work within proximity of potential ACM.

3.8 Refurbishment Work

Nehemiah will carry out Refurbishment and Demolition survey prior to any refurbishment or demolition work. If the refurbishment works are restricted to small areas e.g., kitchen or bathroom replacement, then a localised survey of the areas likely to be affected may be completed and not the entire building.

3.9 Asbestos Remedial Work

Nehemiah will ensure there is a robust process in place for the management of any follow-up works required following the completion of an asbestos management survey.

Nehemiah will ensure that following asbestos surveys, any asbestos containing materials that are found to be in a poor condition or that are likely to be regularly/easily damaged or disturbed through the normal use of a dwelling will be repaired, protected, or removed at the earliest opportunity.

Where there is any doubt as to the composition of the material uncovered, a sample will be taken and analysed in order to facilitate the instruction of remedial works where required.

Where asbestos is positively identified and as a result of a risk assessment (conducted in accordance with published guidance) removal, sealing or encapsulation is recommended, this will be carried out for:

3.10 non-licensed works – as defined in regulation 2 of the CAR 2012 – by specifically trained contractors with appropriate equipment and working procedures in place which are sufficient to comply with the CAR 2012.

3.11 Notifiable non-licensed works – as defined in regulation 2 of the CAR 2012 – by a licensed asbestos removal contractor (LARC) licensed by the health & safety Executive in compliance with the CAR 2012,

or Licensed works - as defined in regulation 2 of the CAR 2012 – by a licensed asbestos removal contractor (LARC), licensed by the Health & Safety Executive in compliance with the CAR 2012.

Where an asbestos containing material has been removed in whole or in part, it will be replaced with a material that has no asbestos content and fulfils the equivalent function of the original asbestos material, e.g., for fire protection.

3.12 Asbestos Information

Nehemiah considers good communication essential in the safe delivery of asbestos management and will therefore ensure that information about asbestos containing materials (known or suspected) is provided to every person liable to disturb it.

Nehemiah will ensure all employees and contractors have adequate asbestos survey information to enable them to manage and/or work safely with asbestos.

Nehemiah will provide advice to customers regarding asbestos containing materials through leaflets and information on our website.

3.13 Record Keeping

Nehemiah has an established and maintained Asbestos Register which details every non-domestic (communal) and domestic property. The Asbestos Register is used to record the details of all asbestos surveys undertaken on Nehemiah properties. This will include the date of the inspection, the findings from the survey, any remediation works identified and subsequently completed. The register will also record the date of any subsequent re-inspection.

Dealing with non-compliance

Any non-compliance issue identified at an operational level will be formally reported to the Director of Operations in the first instance.

The Director of Operations will agree an appropriate course of corrective action with the operational team to address the non-compliance issue and report details of the same to the executive Management Team.

The Executive Management Team will ensure the Board, Audit & Risk Committee and Homes and Communities Committee are made aware of any non-compliance issue so they can consider the implications and act as appropriate.

In cases of a serious non-compliance issue the Executive Management Team and Board will consider whether it is necessary to disclose the issue to Homes England in the spirit of coregulation as part of the Regulatory Framework.

4. Risk Management

Risk Register Ref	Risk
COMP 03 - Health & Safety Breach – Asbestos	Failure to comply with key landlord Health & Safety responsibilities for asbestos resulting in Health & Safety, compliance, and regulatory breaches.
Risk Consequences: Health & Safety breaches – Staff & Contractors • Health & Safety – landlord compliance breaches • Breach of regulatory requirements resulting in fines, penalties, or criminal action • Housing regulator adverse grading/intervention • Insurance claims – customers/staff/contractors • Long term financial exposure for historical claims • Negative Media/Reputation	Management and Mitigation: Nehemiah Asbestos Policy • Asbestos Management Plan • Asbestos Customer Information on website and sign-up packs Effective processes and procedures • Competent consultants utilised to carry out robust training plan for managers and operational staff. • Robust procurement including competency of contractor • Asbestos Register • Trained, experienced and knowledgeable staff • Annual Block Asbestos Re-inspections • Asbestos surveys carried out • Strict & robust process for asbestos removals • Asbestos Risk Assessment in place for Nehemiah Plus Contractors paid for works upon receipt of certification

5. Regulatory & Legislative Compliance Regulations:

- Control of Asbestos Regulations 2012
- The Hazardous Waste (England and Wales) (Amendment) Regulations 2016
- Control of Substances Hazardous to Health Regulations (COSHH) 2002
- Hazardous Waste (England & Wales) Regulations 2005 (Amendment 2009)
- Housing Act 2004 Landlord and Tenant Act 1985 Health and Safety at Work Act 1974 The Management of Health and Safety at Work Regulations 1999
- The Workplace (Health Safety & Welfare) Regulations 1992
- Personal Protective Equipment at Work Regulations 1992
- Gas Safety (Installation and Use) (Amendment) Regulations 2018
- Electrical Equipment (Safety) Regulations 2016
- Construction, Design and Management (CDM) Regulations 2015 Reporting of Injuries,
- Diseases and Dangerous Occurrences Regulations (RIDDOR) 2013

6. Approved Code of Practice: Approved Code of Practice

(ACoP) Managing and Working with Asbestos L143 (Second Edition) 2013
Guidance Notes:

HSG264 - 'Asbestos: The survey guide' (Second edition 2012, this holds ACoP status)
HSG248 – 'Asbestos: The analysts guide for sampling, analysis, and clearance procedures' (First edition 2006)

HSG247 - 'Asbestos: The licensed contractors' guide' (First edition 2006)

7. Links to Other Key Documents

Asset Management Strategy

Health & Safety Policy 2018 Repairs Policy

Gas Safety Policy

Electrical Safety Policy

NEHEMIAH HOUSING PROCEDURE AND INFORMATION MANUAL Asbestos Management Operational Procedure

Purpose of document

This document sets out procedures to control, manage, and minimise the risk of exposure to asbestos within the premises owned or managed by the Association. It is excluding leaseholder premises although shared communal areas will be surveyed where applicable. The procedures will be determined by the Nehemiah Asbestos Management Policy.

1 Definitions

1.1 Asbestos Management Responsibilities

The management of asbestos within the Association's dwellings is the responsibility of the Operations Director.

1.2 Training Matrix

A Training Matrix will describe and formulate the training needs required by a team or an individual. It will examine the tasks undertaken and describe the training required.

1.3 Asbestos

1.3.1 Asbestos is a fibrous mineral commonly used within the building industry from 1950 to 1985 when its use was restricted; it was a component of asbestos cement products up to 1999.

1.3.2 Asbestos uses include, but are not restricted to, the following:

- Pipe and boiler insulation.
- Ceiling and wall panels.
- Sprayed and/or formed fire protection in ducts and building steelwork.
- Asbestos cement products (in use since the 1950's).
- Gutters, rainwater pipes, corrugated roofing sheets.
- Water tanks, flue pipe work.
- Vinyl floor tiles.
- Asbestos ropes, cloth, and fire blankets.

It can also be contained within mastics, sealants, paper, and boards, textured coatings, paints, plastics, and electrical flash insulation.

1.3.3 There are three main types of asbestos – chrysotile, amosite, and crocidolite; they are usually named white, brown, and blue. They cannot however be identified by colour alone.

1.3.4 Inhalation of asbestos fibres has been shown as a cause of the following diseases:

- Asbestosis or Fibrosis, (scarring) of the lung tissue.
- Lung Cancer.
- Mesothelioma, a cancer of the inner lining of the chest wall of the abdominal cavity.

1.4 Asbestos Management Team

1.4.1 The Asbestos Management Team are duty holders with the responsibility for effectively controlling the risk from asbestos and its products.

The Asbestos Management Team comprises:

- Operations Director
- Property Services Manager
- Property Services Officers

1.4.2 The Operations Director duties and responsibilities include:

- Implementation and the continuing review of this procedure.
- Ensuring adequate finance is secured for the delivery of this service.
- Ensuring that all staff within the team are kept fully informed of developments in legislation and good practices relating to the management of asbestos.
- Ensuring competent staff are employed in delivering the procedure.
- Ensuring that the 'Duty of Care' to our tenants, employees, consultants, visitors, and contractors is robust.
- Ensure via appointed staff responsibility for the day-to-day delivery of the process and continuing audit, monitoring and reviews.

1.4.3 The Property Services Manager's duties and responsibilities include:

- That the Asbestos register is kept up to date with additional or extra surveys as dictated by this procedure.
- Organizing a practical prioritized program of asbestos removal. Those areas offering the greatest risk will be treated first. Any new discoveries will either be added to the schedule or treated separately.
- Ensuring all programmed and development refurbishment works fall in line with this procedure.
- Ensuring that the procedure is followed during programmed works.
- Assembling and reviewing a licensed panel of suitable contractors and analytical laboratories.
- Producing, reviewing with others, and updating Risk Assessments and Method
- Statements for the management, surveying, and treatment of asbestos.
- Ensuring that risk assessments are compiled as per this procedure.
- Ensuring that all Asbestos surveys are undertaken in a professional conscientious manner.
- Carrying out training needs analysis with the Group Compliance Manager for the Asbestos Management Team. Training is likely to include, but is not limited to the following:

- Asbestos training to accepted standards.
- Risk Assessment and Method Statement.
- Manual Handling.
- Access equipment and working at Height.
- Confined spaces training.
- Chemical awareness training.

1.4.4 Property Services Officers duties include:

- Ensuring consistency and quality through regular spot checks and audit trail analysis.
- Managing staff leave and performance to ensure availability for asbestos surveying purposes.
- Maintaining the Asset Database and Asbestos Register
- Ensuring that the Asset Database is regularly updating the in-house management system.
- Reassuring tenants and residents in an informative composed manner.

1.5 Asbestos Register

1.5.1 The Asbestos Register will be an active document subject to regular review, updating and scrutiny.

1.5.2 Along with the stand-alone Asbestos Register the same information is first recorded in the Asset database and then transferred on to the Housing Management in-house system (QLX).

1.5.3 An accurate amount of asbestos type 1 surveys of all information gathered is recorded on to the Live Asset Database. This information is copied on to the QLX system and into XL format, which forms the Asset Register.

1.5.4 The Asbestos Register will be owned, maintained, and updated by the Asbestos Management Team.

1.5.5 A register at each pre 2000 Sheltered Scheme, where ACMs are found to be present, will be available on site.

1.5.6 The following information is currently included in the register:

- Address/building name/number or geographical location.
- Any sketch if possible highlighting exact location of the risk.
- A logged report reference number.
- Product type.
- Name of surveyor who carried out the assessment.
- Date of assessment.
- Photographs (where possible).

1.5.7 The following information will be included in any new surveys undertaken:

- Asbestos type.
- Manager's comments and review details.
- Risk Rating.
- Current treatment (sealed / unsealed etc).
- Extent/amount of asbestos.
- Likelihood of disturbance.
- Occupancy rating.
- Exposure potential.
- Location of warning signs.
- Review date.

1.6 Asbestos Survey

1.6.1 The asbestos survey is an integral part of asbestos management.

1.6.2 The asbestos surveys will be completed within the guidelines set out in MDHS 100:

- Type 1 surveys; non-intrusive presumptive general assessment.
- Type II surveys; non-intrusive physical sampling of suspect materials including the taking of samples.
- Type III surveys; intrusive physical sampling of the building fabric including test holes and other major exploration.

1.6.3 The asbestos surveys will typically be:

- Type 1 for general property, Inc. general let, supported, and sheltered accommodation. These form the bulk of the Asbestos Register. Also, on programmed works and development refurbishments in order to assess need for any further analysis.
- Type II for all Type 1 surveys that determine the likely presence of ACM's.
- Type III for major works, including demolition and major refurbishment works. This will be procured by the Property Services Manager via an independent Asbestos Consultant/ Contractor.

1.6.4 The Asbestos Register has been produced from the Stock Condition Survey. The Association's properties built after 2000 were type 1 surveyed. Further type 1 surveys will be completed on:

- Any void property not previously surveyed.
- Any remaining property without a Type 1 survey.
- Any property acquisitions for refurbishment works by the property services department.
- Upon a request by a tenant/resident that has concerns over ACMs in their home.
- Properties included in programme works whether a type 1 survey has been previously undertaken. The further survey will be in conjunction with the risk assessment analysis.
- All communal boiler rooms and service ducts installed pre-2000.

A type II survey will be undertaken when:

- A contractor has concerns or needs to disturb an area identified that has a possibility of ACM's. The survey will be given prioritisation.
- A tenant has concerns or has a need to disturb an area identified in a type 1 survey as having possible ACM's present.
- A type III survey will be undertaken when demolition is taking place, or a major refurbishment identifies a particular need.

1.7 Asbestos Risk Assessment

- 1.7.1 The bulk of asbestos surveys have been completed as type 1 surveys with no risk assessment analysis undertaken. All type II surveys undertaken following the likely indication of ACMs from the type 1 surveys will be conducted with an Asbestos Risk Assessment.
- 1.7.2 All type II asbestos surveys will generate a risk assessment score for the potential asbestos contamination present.
- 1.7.3 The Risk Assessment will produce a final risk rating; this will determine the appropriate course of action. These will include action plans.
- 1.7.4 The risk rating will be generated from a combination of the material rating and occupancy algorithms as indicated in MDHS 100.
- 1.7.5 The final risk factor will give a prioritised treatment regime, with three levels:
- High Priority (Risk factor 15 to 25).
 - Medium Priority (Risk factor 10 to 14).
 - Low Priority (Risk factor 0 to 9).
- 1.7.6 The Health & Safety Meeting carried out quarterly will include for any issues for properties with an Asbestos issue.
- 1.7.7 A traffic light system for dealing with the properties will be developed.
- 1.7.8 Any Properties with ACM's present will be monitored at the quarterly review meetings.
- 1.7.9 ACM's having a high priority rating will be considered for removal or encapsulation to reduce the risk. Regardless of whether they are removed they will be re-surveyed every 6 months to monitor the risk.
- 1.7.10 ACM's having a medium priority rating will be re-surveyed every 12 months to assess if the risk has altered.

- 1.7.11 ACM's having a Low priority rating will be re-surveyed every 18 months to assess if the risk has altered.
High Priority to be considered for removal or monitored every 6 months.
Medium Priority to be surveyed every 12 months.
Low Priority to be surveyed every 18 months.

1.8 Specialist Asbestos Analytical Services

- 1.8.1 The Property Services Manager will appoint a specialist analytical and asbestos management company upon the discovery of any significant ACM's. The duties of which will include, but will not be limited to, the following:
- Air Sampling.
 - Bulk Sampling.
 - Assistance in asbestos management.
 - Advice on asbestos removal companies.
 - Assistance in the training of employed staff.

1.9 Dissemination of Information

- 1.9.1 The Asbestos Risk Assessment will be made available upon request.
- 1.9.2 The Asbestos Register either on QLX or in XL will be available to all staff and any tenant, resident, or contractor upon request.
- 1.9.3 A laminated information sheet of any area likely to contain asbestos will be issued to tenants and another taped to in an inconspicuous place (for example on the inside of a kitchen door).
- 1.9.4 A letter will inform all tenants/residents where asbestos has been recorded as a possibility in their home. The letter will also inform them any risk associated with the likelihood and the measures we will employ to deal with the issue. In most cases, it is highly unlikely that the form of asbestos in our domestic properties would be harmful, particularly if left undisturbed.
- 1.9.5 In most cases the tenant or resident will be requested to phone the office if they wish to disturb any surface that has been noted as possibly containing asbestos. In such cases a Type II survey would be commissioned (see below).
- 1.9.6 When a tenant reports a repair, they will receive a copy of the job order for that repair. On the repair order at the foot of the page there will be two prompts. One will request the Contractor to contact the Office with regards to any further asbestos information and the other inviting the tenant to refresh their memory on the whereabouts and risks from disturbing ACM's by contacting the Asbestos Administrator.
- 1.9.7 The contractor's prompt will ask them to contact the Office if there is a possibility of ACM's in the particular property, flat or communal area that they are intending to work in. Each Area Office will have information on QLX and the Asset Register to inform them in more detail the specific areas of concern.

2 Avoiding exposure to Asbestos.

- 2.1 All known/discovered areas of asbestos will be marked with a hazard sign, where appropriate to prevent accidental disturbance.
- 2.2 Pipes, electrical ducts, and risers in pre 1990 communal schemes will be assumed to be contaminated with asbestos until and unless indicated otherwise.
- 2.3 Pipes, electrical service ducts and risers known to contain asbestos will be kept sealed at all times and will have sufficient signage to prevent accidental removal of covers.

Where possible contaminated ducts will be mechanically sealed via screwed, lockable, or padlocked panels. Where keyed access is required the individual or contractor seeking access will prepare a Risk Assessment and Method Statement. The Asbestos Management Team must approve the Risk Assessment and Method Statement before keys are supplied.

- 2.4 Where access is deliberately made or undertaken in these areas, without consultation with the Asbestos Management Team and the Asbestos Register in a reckless or unsafe manner, this will be regarded as an act of negligence and may result in disciplinary action taken against the individual(s) concerned.
- 2.5 At all times work in suspected or known areas of asbestos contamination will be completed under the Safe Systems of Work Procedure.

3 Discovery of asbestos

In the event of the unexpected discovery of asbestos whilst carrying out a work activity, the following steps will be undertaken:

- Stop work immediately.
- Remove all personnel from the direct area.
- Note names of all those directly exposed.
- Prevent others from accessing the area.
- Where possible seal area (Lock doors etc).
- Contact Line Manager (Operational staff).
- Contact the Operations Director act on the advice.
- Given Install warning signs and notices.
- Reassure others in the area.

4 Safe System of Work

It is the duty of all those involved in the management of asbestos, or those whose normal work pattern may lead to exposure to asbestos, to comply with the Asbestos Management Policy, Asbestos Management Operational Procedure, current

legislation and other applicable rules and regulations. Failure to comply may lead to disciplinary action.

5 Communication Regime

- 5.1 The Property Services Manager & the Property Services Officers is responsible for co-ordinating all surveys.
- 5.2 Several different areas/departments may request asbestos surveys. It is essential that Operations Director's and Senior Manager's follow the request procedure. Failure to do so leaves the Association open to considerable risk.
- 5.3 The Operations Director must ensure that all properties intended to be refurbished, following acquisition, be forwarded to the Property Services Manager.
- 5.4 Housing Officers and Property surveyors must ensure that all requests from tenants/residents who have concern regarding asbestos in their home are forwarded to the Property Services department.
- 5.5 Housing Officers and Property surveyors must ensure that all requests from tenants/residents who have had a previous type 1 survey at their property, yet have concerns over disturbed areas, are forwarded to the Property Services Manager.
- 5.6 Housing officers and Property surveyors must ensure that all requests from Contractors who are working on a property which has had a previous type 1 survey, yet have concerns over disturbed areas, are forwarded to the Management.
- 5.7 The Property Services Manager must ensure that any property involved in programme works, is surveyed and risk assessed for asbestos.
- 5.8 The Property Services Manager must ensure all schemes with communal areas that were built before 1990.

6 Survey Results

- 6.1 Risk Rating
- 6.2 As part of the register the following items are risk rated:
 - Material risk rating (Undertaken by the Asbestos Surveyor)
 - Disturbance/ Occupancy risk rating.
- 6.3 A numerical risk factor will be produced from the sum of the above risk ratings; this will form the Asbestos Priority Rating.

7 Existing Asbestos Surveys

- 7.1 The asbestos survey data from the Stock Condition Survey forms the bulk of the Asbestos Register. As described previously this will be added to and improved through further surveys upon void properties, properties involved in programme works and tenant, Contractor request.

8 Training

- 8.1 Responsibility for training and asbestos awareness rests with all Managers who have staff working with properties, who will ensure:
- All those who potentially may have day-to-day contact with asbestos will be fully trained to external industry standards.
 - Those with management duties or those who are likely to be exposed to asbestos are kept fully informed of new developments.
 - Training in all aspects of asbestos management is cascaded to all levels of staff including Manager, Supervisors, Officers, and other applicable staff. The training will be given in the form of presentations and 'Toolbox Talks'.
 - The completion of a Training Needs Analysis/Matrix is essential. The training will be delivered to all relevant staff and other parties within twelve months of the adoption of this policy and procedure.
 - Operational Procedure and will be subject to a regular review.
- 8.2 Asbestos training will be incorporated into the current induction packages. In the event of delayed induction training, asbestos training will be given as soon as possible.

9 Contractors and Sub-Contractors

- 9.1 The Association recognises that it has a duty of care towards contractors and subcontractors carrying out work for the Association.
- 9.2 An annual questionnaire will be sent to all contractors reminding them of the dangers of asbestos along with the asbestos register.
- 9.3 Contractors will be informed on every order received if there is a possibility of ACMs in the property. They can then phone the local area office to identify the particular area, within the property, where it could possibly locate.
- 9.4 The Association undertakes to make information from the Asbestos Register freely available to contractors.

- 9.5 Information regarding the likelihood of ACM's and its more detailed positioning can be accessed during normal working hours.
- 9.6 An up-to-date Asbestos Register will be sent to all the main contractors.

10 Funding

10.1 Funding will be made available as follows:

- Discovery of asbestos contamination, requiring emergency cleaning and making safe.

The work to be immediately procured, with authorisation to place orders as follows:

- Managers up to their approved limit; and Directors for all other expenditure.
- It is the duty of the Operations Director to obtain retrospective funding for all high priority asbestos removal orders.
- When asbestos needs to be removed, normal tendering/quotation procedures will apply.
- In exceptional circumstances asbestos may be encapsulated. This course of action must be agreed with the Operations Director department and recorded in the Asbestos Register.

11 Signage

11.1 Care must be taken when deciding the location of warning signs. The following is to be taken into consideration:

Location.

Number of signs.

Material to which the signs adhere too.

- 11.2 Warning signs will only be fitted where there is known asbestos present.
- 11.3 Where practicable and appropriate, additional warning signs will be fitted on walls, floors, etc adjacent to ducts, risers, and sub floor areas of known or suspected asbestos contamination.
- 11.4 Where asbestos contamination is known, presumed or strongly presumed in non-public areas, a warning notice specifically warning of asbestos contamination will be used.
- 11.5 Where asbestos contamination is known, presumed or strongly presumed in public areas hazard warning notices will be used, giving the asbestos risk assessment reference number.

- 11.6 All warning signs will be linked to a numbered Asbestos Risk Assessment.
- 11.7 Where ceiling tiles are known, presumed, or strongly presumed to contain asbestos, warning signs will be fitted on walls within 200mm of the ceiling at each corner of the room. Where wall length exceeds 20m or has line of sight restrictions, additional warning signs will be considered.
- 11.8 Where practicable or appropriate warning signs will be supplemented with additional qualifying warning labels e.g. 'These ceiling tiles contain asbestos', etc.
- 11.9 Signage will be inspected following painting or minor building works.

12 Sources of information

- Health and Safety at Work etc. Act 1974
- Control of Asbestos Regulations 2006
- ACoP L143 Work with materials containing asbestos
- ACoP L27, Work with asbestos that does not normally require a licence
- ACoP L127, The management of asbestos in non-domestic premises
- MDHS 100, Surveying, sampling and assessment of asbestos-containing materials
- HSG248 Asbestos: The Analysts' guide for sampling, analysis, and clearance procedures
- HSG227, A comprehensive guide to managing asbestos in premises
- DETR, Asbestos and man-made mineral fibres in buildings
- HSG210 Asbestos Essentials
- ACoP Guidance L5 – COSHH 2002 (as amended)
- Control of Asbestos Regulations 2012
- Employees; Asbestos Essentials task sheets/Equipment and Method sheets
- Approved Code of Practice – L143
- Consultation on Control of Asbestos Regulations 2012
- MS31 - Guidance for appointed doctors on the Control of Asbestos Regulations 2012 - Medical surveillance for workers carrying out licensed work with asbestos
- Equipment and method - EM series
- MS34 - Guidance for doctors on the Control of Asbestos Regulations 2012 – Medical surveillance for workers carrying out non-licensed work with asbestos.