

ASBESTOS MANAGEMENT POLICY AND ACTION PLAN

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1.0 Introduction

This document sets out our policy for how we manage asbestos containing materials in our properties.

Asbestos is the collective name given to a group of fibrous materials that are flexible, mechanically strong and resistant to stretching, heat and chemicals. It has been used in various building products and materials for some considerable time, but was more commonly used in building construction in the periods between 1950 and 1980.

We recognise the possible presence of asbestos within some of our properties under our control. To help manage this risk an effective asbestos management policy and associated plan need to be in place to manage the risks to tenants, contractors and staff.

The presence of asbestos containing materials (ACMs) does not in itself represent a danger. However, asbestos is hazardous when damaged or disturbed and must be treated accordingly. Activities which give rise to airborne dusts e.g. breaking, sawing, cutting, and drilling asbestos containing materials are the most likely to present risks.

2.0 Background

Regulations controlling asbestos materials have evolved from regulations concerning the manufacturing and processing of asbestos into regulations related to the control of the material.

Under current regulations the Association is required to have a sound Asbestos Management Policy to ensure everyone who either, works for or on behalf of the Association, or who may use any facility provided by the Association, is not exposed to asbestos materials in a condition which may expose them to asbestos fibres.

Control of Asbestos Regulations 2012 set out a specific requirement to monitor and manage asbestos containing materials (ACMs) in communal areas and common parts of non domestic and domestic buildings such as blocks of flats, foyers, corridors, lift shafts etc.

Furthermore the 2010 HSG 264 guidance replaces MDHS 100 guidance to ensure the effective monitoring and management of asbestos in all domestic properties provided by the Association. Health and Safety at work regulations also mean that domestic properties are covered by our Asbestos Management Policy to ensure WSHA employees are not exposed to health risks in going about their work.

3.0 Legislation & Regulation

3.1 Control of Asbestos Regulations 2012

Control of Asbestos Regulations came into force on 6th April 2012, updating previous asbestos regulations to take account of the European Commission's view

that the UK had not fully implemented the EU Directive on exposure to asbestos (Directive 2009/148/EC).

Put simply, the changes now mean that some non-licensed work needs to be notified to the relevant enforcing authority, written records should be kept of notified non-licensed work and by April 2015 all workers engaged in notified non licensed work must be under health surveillance by a doctor.

All of the previous requirements under the 2006 regulations remain the same and the changes will not make any difference to the standards of control for asbestos work.

A new category of Notifiable Non-Licensed Work (NNLW) has been created which now gives a three tier system:

- Licensed Work -high risk, high fibre release e.g. removing loose insulation
- Non Licensed Work - low risk, low fibre release e.g. cleaning up small quantities of loose/ fine debris containing ACM dust
- New category (NNLW) – medium risk e.g. minor, short duration work to remove asbestos insulating board as part of a refurbishment project

The definitions to these categories are contained in the Guidance to the Control of Asbestos Regulations 2012.

The Asbestos Regulations also include the 'duty to manage asbestos' in non-domestic premises e.g. G31 and common areas in closes. Main provisions in the regulations include:

- Take reasonable steps to determine the location of materials likely to contain asbestos by implementing effective surveying strategies for domestic and non domestic properties
- Presume materials to contain asbestos, unless there are good reasons not to do so
- Make and maintain a written record of the location of Asbestos Containing Materials (ACMs) and presumed ACMs
- Assess and monitor the condition of ACMs and presumed ACMs
- Assess the risk of exposure for ACMs and prepare a written plan of actions and measures necessary to manage the risk i.e. the 'management plan'
- Take steps to ensure the actions are carried out and recorded
- Training is mandatory for anyone liable to be exposed to asbestos fibres at work

West of Scotland Housing Association (WSHA - the duty holder) must manage the risk in the following ways:

- Keep and maintain an up to date record of the location, condition, maintenance and removal of all the ACMs on the premises
- Repair, seal or remove ACMs if there is a risk of exposure due to their condition or location
- Maintain ACMs in a good state of repair and regularly monitor their condition;

- Have arrangements in place so that work which may disturb ACMs complies with the Control of Asbestos Regulations
- Review the plan at regular intervals and make changes if circumstances change

3.2 Health and Safety at Work Act etc. 1974

Under this Act, employers must conduct their work so their employees will not be exposed to health and safety risks. Employers must also provide information to other people about their workplace which might affect their health and safety. Thus there is a requirement to pass information regarding asbestos to employee's and contractors when working in our premises/properties.

3.3 Management of Health and Safety at Work Regulations 1999

These regulations require employers to assess health and safety risks to employees and third parties, such as residents who may be affected by our activities and make suitable arrangements to protect them.

3.4 Construction Design and Management Regulations (2015)

These stipulate that arrangements should be in place to deal with asbestos during construction, refurbishment and demolition. These arrangements must be site specific and available prior to work commencing.

4.0 Our Policy

West of Scotland Housing Association is committed to conducting our business in a way that protects the health, safety and welfare of its employees, tenants, contractors and visitors. It recognises its responsibility to prevent exposure to the hazards associated with asbestos containing materials (ACMs).

Consistent with this, we will:

- Ensure that all ACMs are effectively managed and associated risks reduced to as low as reasonably practicable
- Maintain an effective, robust and efficient Asbestos Management Plan so that appropriate measures such as monitoring, labelling, encapsulation, inspection or removal of ACMs is undertaken
- Maintain an up to date Asbestos Register
- Promote awareness of the hazards associated with ACMs, the contents of this Asbestos Policy and the associated Asbestos Management Plan
- Ensure that Contractors are aware of any ACMs within our properties
- Freely provide information on ACMs to appropriate personnel and third parties
- Notify tenants of ACMs where appropriate
- Review Asbestos Policy and Asbestos Management Plan annually

5.0 Policy Outcomes

The intended outcomes of this policy are to:

- Ensure asbestos does not become an unacceptable risk to staff, contractors and tenants by undertaking inspections and surveys
- To maintain an asbestos register for all WSHA properties
- Promote awareness of the hazards of ACMs and promote our asbestos register, policy and management plan
- Regularly review policies and procedures
- Manage ACMs left in situ
- Meet or exceed legislative requirements
- Implement an effective management plan and ensure all persons who are required to disturb, repair or remove asbestos are competent and/or licensed

6.0 Asbestos Management Plan

The purpose of the Asbestos Management Plan (AMP) is to assist with the control and management of ACMs in the Associations properties and premises. All properties constructed prior to 2000 will be subject to the AMP.

6.1 Identification of Asbestos

WSHA will increase the intelligence of our stock with regards to asbestos by carrying out surveys to establish the presence, location and type of asbestos contained within a property owned by the Association.

Surveys will be carried out as follows:

- Management survey on void properties built before 2000
- Management or Refurb/Demo survey* on properties due for major repairs built before 2000 if potential ACM is identified at pre inspection stage
- Management or Refurb/Demo survey* on properties due for medical adaptations built before 2000
- A 10% sample of stock not subject to any of the above.

*Survey type is dependent on scale and type of work. Refer to Appendix 1.

We only require one asbestos survey per property and the survey does not need to be repeated. Therefore before a survey is arranged, a check should be made on Promaster to see if a survey has already been done.

Surveys will be undertaken by a UKAS Accredited surveyor/ organisation.

Surveys will identify and record the location, extent, condition and type of any known or presumed ACM.

Surveys can be instructed by any member of the Repairs or Maintenance teams but all completed surveys must be copied to the Senior Contract and Compliance Officer.

6.2 Management Strategy

The organisation appointed to carry out asbestos surveys will assess the risk in relation to ACMs by carrying out a material risk assessment and detailing:

- Product Type
- Damage
- Surface Treatment
- Asbestos Type

6.3 Determining Risk

Each ACM is assigned a score to reflect its asbestos type, condition and surface treatment. This informs the categorisation of the potential for fibre release. The survey makes recommendations and assigns a priority category to the ACM.

The asbestos register forms the basis of the asbestos management plan. Survey results (including negative results) will be recorded on the asbestos register by the Senior Asset Management Officer and a copy of the report saved in common drive - I:Property Services/Asbestos/Surveys. Where no information regarding ACMs is available e.g. areas that could not be accessed during a survey it must be presumed that ACMs are present and the register will reflect this.

The Senior Contracts Assistant will update Orchard (WSHAs Housing Management System) and Promaster to reflect that a survey has been carried out and the result. In the case of a positive asbestos result the user will be directed to refer to the report for further details.

It is not the policy of the Association to remove ACMs that are in good condition and present insignificant risk to the health of the building occupants, however we recognise the need for flexibility where there is a case made for specific removal. Appendix 1 outlines the process to be followed.

If the Association decides to leave the asbestos in situ then it will:

- Log the details on the register and refer user to survey which will include a floorplan of the property with ACM areas highlighted
- 'Flag' the property on the Orchard system to confirm it contains ACMs
- Ensure that all tenders for planned and cyclical works include reference to the Control of Asbestos Regulations 2012 and the Associations asbestos register

Damaged ACMs will be made safe either by sealing, encapsulating or by removing the ACM entirely. The asbestos register will be updated to reflect the action taken.

6.4 Communicating with our Contractors

Prior to any work being instructed and carried out in properties owned or managed by WSHA, the Asbestos register must be consulted.

All properties constructed prior to 2000 have been flagged in Orchard to inform the user of a potential presence of asbestos in the property. Where our contractor is being instructed to carry out a repair to such a property they will be advised that ACMs may be present in the building.

A copy of the asbestos register will be e mailed out to contractors on a monthly basis with recent changes highlighted.

6.5 Contractors Responsibilities

Contractors (including sub-contractors) working for WSHA are responsible for ensuring that all employees under their control reference the Asbestos Register and understand its content and actions required. They are also responsible for ensuring all employees under their control work in line with the Associations Asbestos policy and management plan.

Prior to starting a job if a contractor suspects the presence of asbestos they must not start it and contact the Association for advice. If the property has not been previously surveyed and was constructed prior to 2000 the job must be postponed until a survey is carried out.

When, during the course of any work, asbestos or material suspected of being asbestos, not identified by the asbestos register is discovered, the contractor will ensure that:

- All work is stopped in the area
- All persons are removed and kept out of the immediate vicinity without causing undue concern
- The area is closed, sealed or locked off (where practicable.)
- Any equipment or materials are left in place. These will require to be disposed of as special waste depending on the result of sampling
- A warning sign(s) with the following, or similar, wording:- 'POTENTIAL ASBESTOS HAZARD-KEEP OUT' is prepared and prominently displayed. Where this is not deemed appropriate to use this type of wording alternative strict entry prohibition notices will be used
- The Senior Asset Management Officer and Property Services Manager are immediately notified
- Arrangements are made for the suspected ACM to be sampled by a competent Asbestos Surveyor and analysed by a UKAS Accredited Laboratory

The above may vary depending on the particular circumstances involved. Contractors should refer any queries to WSHA at the earliest opportunity.

6.6 Communicating with our Tenants

Where asbestos materials are identified, are in good condition and remain in situ, the Senior Asset Management Officer must notify the relevant Housing Officer and Housing Assistant for the property. They will then provide the tenants with letter and information including FAQ (please see sample at appendix 2). The Housing

Services staff will include the leaflet in sign up packs and discuss at new tenant sign up visit or will hand deliver to existing tenants where asbestos has been found.

6.7 On-Going Monitoring

All asbestos records and procedures must be regularly monitored and reviewed. It is imperative that all asbestos documents are kept up to date and are accessible. The asbestos register is an excel spreadsheet located on the common drive – I:Property Services/Asbestos/Asbestos Register - All Areas

The register is set up to be read only for the majority of staff. Editing permissions are set for the Senior Compliance Officer, Senior Contracts Officer and Property Services Manager.

Any changes to the condition and location of any known or suspected ACM's must be recorded on the asbestos register and associated files. Similarly any removal work must be recorded.

6.8 Review of the Plan

The Association will review the asbestos management plan every year to ensure it is working effectively. This review will be linked to the corporate risk register and the risk adjusted as necessary.

Appendix 1

Asbestos Management Surveys

- An asbestos management survey is a non-intrusive survey, which should be completed by a competent person and meet the criteria specified in Asbestos: The Survey Guide (HSG264). The surveyor completing this work is expected to be capable of determining the number of samples necessary in any given room based on the material, location and their experience
- Management Surveys sample all readily accessible suspect materials and are generally commissioned in order to develop general information on the incidence of ACM's across housing stocks and office/commercial premises

Refurbishment and Demolition Surveys

- If downtaking or intrusive maintenance work is planned, then a Refurbishment and Demolition Survey should be completed instead of a Management Survey
- Refurbishment & Demolition surveys are undertaken where significant disruptive works will be carried out in properties. While this typically relates to demolition and major refurbishment works, the HSE have issued guidance stating that this type of survey should be undertaken in advance of planned improvement project e.g. kitchen and bathroom replacement projects. (Refurbishment & Demolition surveys sample all suspect materials, and are intrusive leading to damage to wall panels, floors, service risers etc.)
- Where improvement programmes are to be undertaken in the housing stock for example: kitchen and/or bathroom replacement programmes, a representative sample number of Refurbishment & Demolition surveys will be carried out on each property type included in the project

Appendix 2 – Example Tenant Letter and Info & FAQ Leaflet

Name
Address

Date

Dear xxx

Asbestos Survey

A recent survey has revealed the presence of Asbestos in your property in the following locations:

- All ceilings throughout the property

Following the survey, it has been determined that the asbestos material in your home is in good condition and it is in a position where it will not be disturbed, therefore it poses no risk to you.

I have enclosed an information leaflet which provides further information on Asbestos.

If you have any further queries, do not hesitate to contact me on xxxx

Yours sincerely

Xxx
Housing Officer

ASBESTOS IN THE HOME

GENERAL ADVICE AND INFORMATION

Introduction

This information leaflet addresses questions and answers about asbestos in the home. It explains what it is, why it might be a problem and how to deal with it.

Asbestos is a mineral and its fibres are strong and resistant to heat and chemicals. This has led to its use in a wide variety of building materials and products particularly between the 1950's and the 1980's.

Whilst asbestos is potentially a very hazardous material, the risk from asbestos in the home is very low. If the asbestos containing material is in good condition, and in a position where it will not be disturbed, it poses no risk.

Why may asbestos be a problem?

When asbestos materials become damaged or disturbed they can release fibres into the air. These fibres can be breathed deep into the lungs where they can stay for a long time and may cause damage. Asbestos fibres and dust are potentially dangerous if inhaled in higher concentrations over a period of time when they can cause serious lung diseases including cancer. However, in order for these levels to be reached, the asbestos containing materials have to be significantly disturbed by scrubbing, sanding, scraping or cutting/drilling.

FREQUENTLY ASKED QUESTIONS

Textured coatings

Q - Can I stick drawing pins into the wall or ceiling to hang decorations etc.?

A- Yes, this is acceptable

Q - Can I paint over the ceilings?

A- Yes this is good practice as it seals the material.

Q - Can I remove, drill, scrape or sand down the material?

A - No, under no circumstances should this be done, if removal or disturbance is necessary you must contact West of Scotland Housing Association (WSHA) as this work will require a specialist contractor.

Q - Can I plaster over the existing textured coating?

A- No, in some cases this work may also require a specialist contractor; contact must be made with WSHA.

Q - Can I change light fittings/fixtures or sockets?

A- No, Contact must be made with the Association as permission will need to be obtained first. Light bulbs can be changed safely.

Q - What if the ceiling is damaged by accident/leak etc?

A- Contact WSHA who can arrange for clean up and repair. Please tell the repairs assistant that there is asbestos in the ceilings.

West of Scotland Housing Association

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