

Asbestos Management Policy

Customer
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1.0 Introduction

1.1 This policy is part of the framework of policies covering Property Services. These are identified on the front sheet under links to other policies.

1.2 The Asbestos Management Plan (AMP) applies to all properties that are the responsibility of Cloch Housing Association (CHA), and to asbestos waste that is fly tipped on land owned by Cloch Housing Association and to ensure the health, safety and welfare of our tenants, owners, contractors, staff and all other users and agencies where asbestos may be present within our properties.

The Asbestos Management Plan is produced in accordance with relevant legislation and related codes of practice.

1.3 The Management Plan sets out the mechanism by which Asbestos Containing Materials (ACMs) are managed. It includes details on how (CHA) intends to:

- Protect those working on the fabric of our properties.
- Protect those working and living in our properties.
- Effectively control any works likely to affect ACMs.
- Identify and categorise ACMs, and manage hazards based upon prioritisation and assessment of the risk that they present.
- Produce a prioritised programme for the remediation of ACMs that, because of their location and, or condition, present an actual perceived risk to health, and to remove such risk as soon as possible.
- Monitor and maintain the condition of identified ACMs that are assessed as being able to be left in-situ.

1.4 The presence of an ACM does not in itself constitute a danger. However, the ACM may pose a hazard if disturbed or damaged and must be treated accordingly. The primary purpose of this plan therefore is to ensure that ACMs are not disturbed, except in a controlled environment during the removal process.

1.5 In order to fulfil our responsibilities CHA will commission Approved Asbestos Consultants (AAC) to:

- Undertake Management, Refurbishment or Demolition asbestos surveys as appropriate.
- Carry out asbestos re-inspections where instructed by CHA.
- Label Asbestos Containing Materials (ACMs) in communal areas.
- At a later stage, provide and display floor plans within communal areas which identify whether asbestos is present or not, and pass all information to CHA.

1.6 Cloch Housing Association retains overall responsibility for the duties set out in point 3.2 below. Cloch HA will ensure that this management plan is implemented so that the risk of asbestos exposure is adequately controlled using a risk based approach – see Roles and Responsibilities.

2.0 Relevant legislation and documents

2.1 The main legislation and documents relating to this Asbestos Management Plan are:

- **The Health and Safety at Work Etc Act 1974:** This is the primary legislation providing the framework for all subsequent legislation in this area.
- **Workplace (Health, Safety and Welfare) Regulations 1992:** These regulations require employers to maintain workplace buildings so as to protect occupants and workers.
- **The Management of Health & Safety at Work Regulations 1999:** These regulations address Health and Safety issues specifically in the workplace, affecting the workforce and third parties. This is where the requirement for risk assessment is set out.
- **The Control of Asbestos Regulations 2012:** These regulations are wider than just the work place. They prescribe that organisations must have a management plan.
- **HSG 264 Asbestos: The Survey Guide** - Surveying, Sampling and assessment of Asbestos Containing Materials. This guide replaces and expands upon MDHS100.
- **The Construction (Design & Management) Regulations 2015:** These regulations are not specifically about asbestos but set out regulations about the management of construction projects on our sites.

3.0 Roles and responsibilities

Cloch Housing Association (Duty Holder)

3.1 Cloch Housing Association is a 'Duty Holder' as defined within Regulation 4 of the Control of Asbestos Regulations 2012 (CAR).

3.2 As a Duty Holder, Cloch Housing Association has responsibility to fulfil the requirements as defined within Regulation 4 of the Control of Asbestos Regulations 2012 (CAR). These include:

- Take reasonable steps to locate and identify the presence of Asbestos Containing Materials in its assets. This role may be assigned to an Approved Asbestos Consultant (AAC) who will carry out surveys of properties as necessary.
- Produce, implement and review, at regular intervals, an Asbestos Management Plan for its assets.
- Monitor the implementation of the management plan to ensure that working arrangements and provisions of financial, technical, human and other resources are suitable and sufficient to meet its requirements.
- Ensure that asbestos related information is issued to all organisations and persons who may potentially disturb Asbestos Containing Materials during their activities working on Cloch HA assets.
- Ensure that an Approved Asbestos Consultant freely shares information, either currently within its possession or obtained in the future, regarding Asbestos Containing Materials within assets.

- Train all personnel, where required, to ensure that they are competent to fulfil the requirements of their roles and responsibilities.

Delegated Duty Holders and Responsibilities

3.3 Cloch Housing Association is a Registered Social Landlord. It is also considered to be a 'Duty Holder' under the CAR and the Director is responsible for undertaking, or delegating the duties under Regulation 4 of the CAR. These roles are delegated in accordance with the CAR as below:-

- The delegated asbestos duty holder is the Property Services Manager. The main duties of the duty holder will be :-
- The implementation of the asbestos management plan. Creating and keeping up to date an asbestos register for all Cloch HA properties.
- Instructing asbestos surveys and removal of any ACM`s if appropriate.
- Providing advice and ensuring suitable training is given to appropriate staff.
- Monitoring the implementation of the Asbestos Management Plan to ensure that working arrangements and provisions of financial, technical, human and other resources are suitable and sufficient to meet its requirements.
- Monitoring surveying targets to ensure a minimum of 10% surveys of CHA housing property archetypes are completed by 2014/15. The surveys should also take into account properties older than year of build from 2000 where there are long standing tenants to check that there are no possible ACM`s such as artex.
- Ensuring that all non domestic properties and flat common areas are surveyed.
- Ensuring that all materials are reviewed and re-inspected as necessary, either by an appropriately trained staff member at the Association or by directing the Approved Asbestos Contractor to undertake the work.
- Ensuring upload of full records of asbestos removal works into the Asbestos Register System.
- Reviewing all information and records regarding asbestos within the Cloch Housing Association property assets.
- Reviewing risk assessments received by an Approved Asbestos Consultant and directing action according to local judgement.
- Make readily available all relevant asbestos information to personnel, contractors, residents and visitors, to enable them to effectively manage the risk of asbestos exposure on the site under their control (contractors also have responsibility to access asbestos information. This should also include advice letters to be sent to advise them of where they have an ACM and how to manage this.
- Ensuring that all personnel within their control, including contractors, residents and visitors are fully informed of any potential asbestos hazards in the areas they live or work and visit.
- Identifying training requirements for all personnel under their control, to ensure that they are competent to fulfil the requirements of their roles and responsibilities.
- Assisting and advising staff, wherever possible, to enable them to meet their delegated responsibilities under this Asbestos Management Plan.

- To assess the competence and qualifications of Approved Asbestos Consultants and any staff involved in working for Cloch HA on asbestos surveys and asbestos removal work.
- To assess the competence and qualifications of any analyst that is used by Cloch Housing Association, and to ensure that the laboratory has a current UKAS certificate.
- Ensuring any Asbestos Removal Contractor and any Approved Asbestos Consultants are complying with all legislation and health and safety advice regarding all aspects of asbestos work.

General Contractors and Subcontractors

3.4 Contractors and Subcontractors are responsible for the following: -

- Compliance with current legislation associated Approved Codes of Practice (ACoPs) and Guidance, also adhering to the Asbestos Management Plan, and any other relevant procedures.
- Identification of training requirements for all personnel under their control, to ensure that they are competent to fulfil the requirements of their roles and responsibilities, asbestos awareness training being a mandatory requirement for all staff.
- Carrying out a risk assessment before commencing any work to establish the risk associated with potential Asbestos Containing Materials in the property.
- Where the above risk assessment indicates it is necessary to access the Asbestos Register to view the relevant survey, or where there is no survey to require one to be carried out before commencing work.
- Where work is to be carried out on non domestic properties, request from the duty holder a copy of the relevant survey.
- Fully communicating with all personnel who may be affected about the location of and risk associated with any Asbestos Containing Materials in the property(s) in question.
- Immediate cessation of works if suspected Asbestos Containing Materials are discovered, and reporting to the duty holder for advice/action before proceeding.

3.5 In addition all contractors are responsible to comply with terms and conditions set out in the contract.

Asbestos Removal Contractors

3.6 Asbestos Removal Contractors are responsible for the following:

- Compliance with current legislation, associated Approved Codes of Practice (ACoPs) and Guidance, the Association's Asbestos Management Plan, and any other relevant procedures.
- Raising any issues relating to the health and safety aspects or additional costs of the project.
- Ensuring that all asbestos removal works are carried out in strict accordance with the Control of Asbestos Regulations 2012 and its

supporting ACoP L143 Work with Asbestos Materials, and including any subsequent revisions to these documents.

- Carrying out enclosures and removal in accordance with HSG 247 Asbestos: The Licensed Contractor's Guide.
- Provision of a plan of work to an Approved Asbestos Consultant and the association's duty holder, including details of project resources, timetable and agreed emergency procedure.
- Provision of Statutory Notices to the relevant Statutory Authority prior to commencing asbestos works, or, by agreement and at the request of an Approved Asbestos Consultant, applying for a waiver from the minimum notice.
- Regularly inspecting the work environment, and reporting immediately any defects to an Approved Asbestos Consultant, and where instructed rectifying the defect.
- Provision of copies of notification and consignment notes and other relevant documentation with final account to an Approved Asbestos Consultant and the Association's duty holder.

3.7 The responsibility for compliance of asbestos removal contractors is the same as set out in 3.5.

4.0 Asbestos Information & Distribution

All materials within the Cloch HA property portfolio MUST be presumed to contain asbestos and treated accordingly unless, or until adequate information is received to the contrary. Properties known to have been constructed from 2000 onwards will not contain any Asbestos Containing Materials.

4.1 It is essential that all available information and records regarding asbestos within the Cloch HA portfolio are maintained, updated and distributed to maximum effect, to ensure that all relevant personnel, at every level, are equipped with the most accurate information possible so that they are able to identify and manage asbestos hazards during their day to day activities.

4.2 All records and information which is currently available will be collated, maintained, reviewed, updated and issued, by the Cloch HA's duty holder.

4.3 All relevant CHA personnel and contractors involved in any development or maintenance works on housing properties will have access to the Asbestos Register.

4.4 Labelling of ACM's within general needs properties has not been adopted. However, it is intended that from 2015 all properties surveyed for asbestos by an Approved Asbestos Consultant will receive a schematic plan of each floor within that property, which identifies all the areas where materials that contain asbestos have been found.

This schematic plan is to be displayed adjacent to the electrical consumer unit.-

A folder containing the details of the ACM's should also be available at each project for information for the contractors.

- 4.5 If any reactive repair needs to be carried out within a property, the appointed contractor attending the address must check the Asbestos Register or ask for a copy of the asbestos register before going to site, and view the schematic plan prior to commencing any works. Please see General Works 7.0 for more details.
- 4.6 When drawing up specifications for any planned improvement works or Maintenance works, reasonable precautions must be taken to determine whether asbestos is present, including accessing the Asbestos Register to view any surveys relevant to the proposed works. Where no asbestos register is available, surveys will be carried out by an Approved Asbestos Consultant prior to any work being commenced.
- 4.7 For planned works, it is expected that the contractor will review the asbestos register and take appropriate steps to safeguard his own and the occupant's safety prior to commencement of any works. Please see General Works for more details.

5.0 Surveys

- 5.1 All asbestos surveys undertaken must be in accordance with HSE Guidance HSG 264 Asbestos: The Survey Guide.
- 5.2 There are two types of survey contained within HSG 264, a Management Survey and a Refurbishment and Demolition survey.

Management Survey

- 5.3 A management survey is the standard survey. Its purpose is to locate, as far as reasonably practicable, the presence and extent of any suspect ACMs in the building which could be damaged or disturbed during normal occupancy, including foreseeable maintenance and installation, and to assess their condition.
- 5.4 Management surveys will often involve minor intrusive work and some disturbance. The extent of intrusion will vary between premises and depend on what is reasonably practicable for individual properties; The survey will usually involve sampling and analysis to confirm the presence or absence of ACMs. However, a management survey can also involve presuming the presence or absence of asbestos.
- 5.5 This is the most common form of asbestos survey commissioned by Cloch HA however, it is not suitable for significant refurbishment or demolition.
- 5.6 As artex is difficult to identify whether it contains asbestos or not, it has been decided that due to the age of the properties, all artex will be presumed to contain asbestos and thus will not need to be sampled. Consideration should be given to requesting a survey if the scope of works involves this material.

Refurbishment or Demolition Survey

- 5.7 A refurbishment and demolition survey is needed before any refurbishment or demolition work is carried out. This type of survey is used to locate and describe, as far as reasonably practicable, all ACMs in the area where the refurbishment work will take place or in the whole building if demolition is planned. The survey will be fully intrusive and involve destructive inspection, as necessary, to gain access to all areas, including those that may be difficult to reach. A refurbishment and demolition survey may also be required in other circumstances, eg when more intrusive maintenance and repair work will be carried out or for plant removal or dismantling.
- 5.8 The survey is designed to be used as a basis for tendering the removal of ACMs from the building prior to demolition or major refurbishment so the survey does not assess the condition of the asbestos, other than to note areas of damage or where additional asbestos debris may be expected to be present.
- 5.9 The same presumption for artex containing asbestos in a refurbishment or demolition survey is the same as determined in 5.6.

Asbestos Surveyors

- 5.10 Organisations carrying out asbestos surveys for CHA must either:
- Be accredited by the United Kingdom Accreditation Service (UKAS) as complying with ISO17020 to undertake surveys for Asbestos Containing Materials; or
 - Be able to adequately demonstrate, that they:
 - Have adequate training and experience in such work.
 - Can demonstrate independence, impartiality and integrity.
 - Have an adequate quality management system; and
 - Are carrying out any surveys in accordance with recommended guidance HSG 264 Asbestos: The Survey Guide, or the most up to date guidance.
- 5.11 Surveying organisations are required to have for the duration of the contract Public, Employer's and Professional Indemnity insurance to appropriate levels.
- 5.12 All personnel carrying out asbestos inspections must:
- Have appropriate training, holding as a minimum the BHOS P402 or RSPH Level 3 certificate.
 - Have a minimum of 6 months experience of this type of work.
 - Be able to demonstrate independence, impartiality and integrity.
- 5.13 Cloch Housing Association requires an Approved Asbestos Consultants to carry out Management, and Refurbishment or Demolition surveys on their behalf.
- 5.14 CHA will carry out an annual check of staff qualifications and competence, company licence and insurance documentation to ensure compliance.

Survey Reporting Format

- 5.15 An Inspection Report must be provided for each asset or communal area that is surveyed, including the following information as a minimum:
- A list of all rooms and areas inspected.
 - The inspection date.
 - The inspector's name and company name.
 - A list of all rooms and areas which could not be inspected together with the reason why.
 - Plan drawings of the building showing the location of ACM's, sample points, and copies of all material sample analysis sheets.
- 5.16 All areas of suspected ACM's observed must be reported on individually including as a minimum:
- Location of the material.
 - Estimated quantity.
 - Type of asbestos suspected.
 - A photograph of the material.
 - Recommendations.
 - Risk Assessment (Material & Priority) conforming to HSG 264.
 - All artex will be assumed to contain asbestos.
- 5.17 In addition to the inspector's written report, where the inspector identifies an area of damage which could contain asbestos and is causing a serious, immediate potential exposure hazard, then he/she must verbally bring the matter to the immediate attention of Cloch Housing Association, and provide practical advice and guidance on immediate remedial action requirements.

6.0 Risk Assessment

- 6.1 A risk assessment will be carried out:
- After a survey has been completed on a property
 - Before any planned maintenance is carried out on a property
 - Before any reactive repairs are carried out in a property
- 6.2 Risk assessments before any planned maintenance is carried out will be done by the Property Team at Cloch Housing Association. In addition, the contractor carrying out the works is responsible to carry out a risk assessment before commencing. See General Works.
- 6.3 Because of the nature of reactive repairs, the same level of risk assessment used for planned works may not be realistic. Cloch Housing Association considers it to be the duty of the contractor to carry out the necessary risk assessment before starting work, and not to proceed with the work if the risk is identified as significant without consulting the Asbestos Register. See General Works.

- 6.4 An Approved Asbestos Consultant is required to carry out a risk assessment on completion of every property survey. This risk assessment is composed of two parts, a **material assessment** and a **priority assessment**.
- 6.5 On receipt of the survey and risk assessment, Cloch Housing Association is required to carefully check the priority assessment and the recommendations for work from the AAC. Their understanding of the stock will enable them to ensure that risk has been properly calculated, and appropriate action is taken.

Material Assessment

- 6.6 The material assessment identifies high risk material that will most readily release airborne fibres if disturbed. It does not automatically follow that those materials assigned the highest score in the material assessment will be the materials that should be given priority for remedial action.
- 6.7 The survey report contains a material assessment which looks at the type and condition of all Asbestos Containing Materials (either verified by sampling or presumed as containing asbestos), and the ease with which it will release fibres if disturbed.
- 6.8 Each material receives a scoring against four categories: Product Type, Extent of Damage, Surface Treatment & Asbestos Type (or presumed asbestos type), in line with the Material Assessment Scoring Schedule set out in **Appendix 1**.
- 6.9 One score must be entered per category to suit the best description of the material surveyed. Scores for all four categories are then added together to produce an overall assessment (maximum score 12) and a subsequent hazard banding as set out in the table below. The scoring and colour allocation is determined by the Material and Priority Assessment Scoring Schedule in Appendix 1.

Potential to Release Fibres Score Hazard Band

> 9	High	A
7 - 9	Medium	B
5 - 6	Low	C
1 - 4	Very Low	D
0 None	None	E

Priority Assessment

- 6.10 The priority assessment considers the likelihood of the ACM actually being disturbed and exposing someone to asbestos fibres. For there to be risk to health it is not enough for it to be damaged or friable, but it also needs to be disturbed and get into the air we breathe. The priority assessment therefore considers the normal occupant activity in that area, the likelihood of disturbance and so on.
- 6.11 Each ACM is again scored (see Appendix 1 for scoring explanation). All the scores for each of the sub-sections of the four categories are added together and divided by the number of each sub-section to produce an average score per category. The four category scores are then added together to produce a priority assessment score (maximum score 12).
- 6.12 The priority risk assessment is the part of the risk assessment which must be reviewed by CHA on receipt of the surveying report and recommendations by an Approved Asbestos Consultant.

Calculating an overall risk assessment rating

- 6.13 An overall risk assessment rating is calculated by adding the priority assessment score to the material assessment score. It is this overall score which is used to prioritise any necessary management and/or remedial works.
- 6.14 For the purpose of this Management Plan the risk assessment as detailed below should be used as a guide to prioritise remedial work requirements.

Overall Risk Assessment Rating

Risk Assessment Score

Risk

Rating

ACTION:

Access to ACM

Action: Removal /Encapsulation /Remediation

Re-inspection timeframe

19 to 24: **Very High.**

Restrict access to the area Remove immediately. n/a

14 to 18: **High.**

Restrict access to the material. Encapsulate / remove / remediate at the earliest opportunity. Re-inspect every 12 months for notifiable, and 2 years for non-notifiable products.

9 to 13: **Medium.**

Restrict access to the material if necessary. Schedule for encapsulation /removal / remediation when possible. Re-inspect every 12 months for notifiable, and 2 years for non-notifiable products.

5 to 8: **Low.**

No immediate action required. Monitor the material closely, and re-inspect every 2 years.

1 to 4: **Very Low:**

No immediate action required Monitor the material closely, and re-inspect every 5 years.

6.15 Although these are the recommended actions, CHA will decide on a property type by property type basis what the appropriate action will be, and instruct an Approved Asbestos Consultant accordingly.

6.16 All areas identified as containing ACMs where the overall risk is 9 or above will have access restricted until the ACM is encapsulated or removed to ensure all personnel, residents, in-house contractors, subcontractors and visitors, as well as third parties, are not exposed to the Asbestos Containing Materials.

6.17 Any asbestos encapsulation, removal or remedial works must be done in accordance with the procedures set out below.

Material Condition Review and Re-inspection

6.18 Once identified, by survey, the condition of all Asbestos Containing Materials left in situ must be regularly monitored as set out in the above table.

- 6.19 Re-inspections should be carried out by a competent person, holding as a minimum the BHOS P402 or RSPH Level 3 certificate.
- 6.20 Cloch Housing Association is responsible for ensuring that material reviews and inspections are carried out regularly. This work will be issued to an Approved Asbestos Consultant.
- 6.21 A full record of periodic reviews and re-inspections will be maintained on the Asbestos Register System, along with any necessary changes to the Material Assessment and Priority Scores. The non-domestic housing properties periodic reviews and re-inspections will be maintained on a spreadsheet.

7.0 General works: Planned Maintenance / Upgrade Works

- 7.1 Before commencing any planned maintenance or upgrade a full risk assessment must be undertaken by the CHA or its designated designer. Where the risk assessment indicates it is necessary, the Asbestos Register should be checked for any survey report that may have been done on the property.
- 7.2 Where there is no survey and the risk assessment indicates it is necessary, the relevant asbestos survey must be carried out before planned works can commence. It is therefore recommended that coordination of the planned maintenance programmes and the programme of asbestos surveying takes place.
- 7.3 Refurbishment works or demolition will require a Refurbishment or Demolition survey to be completed.
- 7.4 Where we are carrying out refurbishment works on a large number of properties for the same type of work, it is unrealistic to carry out a refurbishment and demolition survey to every property, and thus a minimum of 10% of each property archetype per estate is to be surveyed to provide information that can be used on other similar properties.
- 7.5 If there are any materials of concern found in other properties that have not been noted in the sample properties, then the work should be stopped immediately and the Asbestos Duty Holder contacted.
- 7.6 The contractor is also responsible to carry out a risk assessment before starting work. This should be checked by the CDM Coordinator.
- 7.7 Whilst maintenance works are ongoing, all materials on site must be presumed to contain asbestos and treated accordingly unless, or until, adequate information is received to the contrary.

Responsive Repairs

- 7.8 It is not practical for Cloch Housing Association to carry out an asbestos risk assessment on every responsive repair. The Asbestos Register System is available to contractors for all CHA stock including domestic dwellings and flat common areas, and it is their responsibility to check the Asbestos Register

System for a report on the property in question, and to request a survey if no report is available. Where surveys of other properties of the same archetype are available, they may be used for the property requiring maintenance work but only with caution. If there is any suspected asbestos containing material found, work should stop immediately and the Emergency Procedure should be implemented (**see item 11**).

- 7.9 Where maintenance of a non-domestic property is to be carried out, no work should be undertaken by the contractor until he has obtained a copy of the asbestos register for that building. If there is any suspected asbestos containing material found, work should stop immediately and the Emergency Procedure should be implemented (**see item 11**).
- 7.10 It is the responsibility of the contractor to conduct a risk assessment before carrying out any responsive repairs. This risk assessment may:
- Demonstrate that no further action needs to be taken before works can proceed.
 - Demonstrate that works can proceed but methods need to be adjusted to account for assumed ACMs.
 - Require the contractor not to proceed with works until they have looked at the survey for the property.
- 7.11 Where the third bullet point applies and there is no survey for the property the works cannot proceed until a survey has been carried out. Where repairs fall into the emergency category the resident may have to be decanted until the work is completed.

ACMs uncovered during works

- 7.12 Where suspected Asbestos Containing Materials are disturbed or uncovered during works the Emergency Procedures should be implemented. (**see item 11**).

Fly Tipped Asbestos Waste

- 7.13 Any person discovering fly tipped waste which is suspected to contain asbestos should immediately report it to the Asbestos Duty Holder or his designated replacement.
- 7.14 Under no circumstances should the material be disturbed by anyone. Where necessary e.g. where personnel have been contaminated by the material the Emergency Procedures in item 11 should be followed.
- 7.15 The waste should be quarantined and secured all in accordance with the **HSE Asbestos Essentials Guidance a38**. Warning notices should be posted, to prevent access by unprotected personnel.
- 7.16 Cloch Housing Association is responsible for the removal of asbestos waste illegally tipped on its land, or within Cloch's properties. When reported, an Approved Asbestos Consultant should be contacted immediately to make the

area safe and to remove the asbestos and clear the area in accordance with the removal procedures below.

7.17 Where fly tipped waste is on private land, CHA do not have a duty to remove it.

8.0 Removal, encapsulation and remedial works

8.1 Although certain asbestos removal or remedial activities do not necessarily require the use of a Licensed Asbestos Removal Contractor, to maintain quality of service Cloch Housing Association will only use Approved, Licensed Asbestos Removal Contractors to carry out any asbestos removal, repair or remedial works under its control. This is irrespective of whether the particular asbestos work is licensable or non-licensable.

8.2 The requirement for asbestos removal/encapsulation/remedial works may be triggered:

- When a particular material's Risk Assessment Rating is identified to be medium and above.
- Where asbestos has been damaged resulting in a release of fibres.
- As a result of planned maintenance, demolition or refurbishment.

8.3 In the event of any of the above occurrences, the type and extent of works required will first be agreed between Cloch Housing Association and an Approved Asbestos Consultant. This could include one or a combination of the following;

- Removal (full or partial).
- Remediation.
- Encapsulation.
- Environmental Clean.

9.0 Emergency Procedures

9.1 When a suspected Asbestos Containing Material is reported to Cloch Housing Association by a member of staff, contractor, resident or any other party it must immediately be reported to the Asbestos Duty Holder and an Approved Asbestos Consultant engaged to provide assistance in dealing with it. An Approved Asbestos Consultant must carry out an Environmental Assessment of the risk, and recommend action accordingly (see section on risk assessment above). Where appropriate the emergency procedures in this section must be followed.

9.2 In any circumstance where there is an uncontrolled release of asbestos into the workplace, or discovered or damaged materials that are suspected to contain asbestos, then the emergency procedure as detailed below and in the **HSE Asbestos Essentials Guidance em1** must be adhered to.

9.3 Everyone who has not been contaminated should be kept out of the area.

- Report the problem to the person in charge as soon as possible.
- Put up a warning sign "possible asbestos contamination."

- Give the client a sample to send for analysis.
 - If the sample does contain asbestos, carry out a risk assessment and decide if the task needs a licensed contractor.
- 9.4 The Asbestos Duty Holder will ensure that the asbestos register is updated.
- 9.5 All asbestos fibre exposure to unprotected personnel must be recorded and placed on the person's employment records. An entry should also be made in the site accident book. All records should be kept for a minimum of 40 years.

The information to be recorded should include the following;

- Affected person's name, address and national insurance number.
- Date of exposure.
- Location of exposure.
- Description of events leading to exposure.
- Details of any PPE & RPE being used by the affected person.
- Type of asbestos and level of exposure if known.
- Signed declaration by the affected person and their Manager confirming that the potential exposure has occurred.

10.0 Staff awareness / Asbestos Awareness Training

- 10.1 Cloch Housing Association will comply with Regulation 10 of the Control of Asbestos 2012: Information, Instruction and Training, by providing Asbestos Awareness training for all Cloch HA staff who are liable to be exposed to asbestos, or who supervise those employees.
- 10.2 Any other contractor or sub contractor who work on Cloch HA assets will comply with Regulation 10 of the Control of Asbestos 2012: Information, Instruction and Training, by providing Asbestos Awareness training for all Cloch HA staff who are liable to be exposed to asbestos, or who supervise those employees.
- 10.3 The Asbestos Awareness training aims to balance the technical aspects of asbestos with the practical management using "real life" scenarios in small groups to facilitate discussion and questions. It will cover the Control of Asbestos Regulations 2012 and our continued obligations as a landlord to inspect common parts & manage works safely, and keep good records.

Additional Training

- 10.4 Employees whose work could foreseeably expose them to asbestos or who may be involved in managing asbestos programmes of work or any other asbestos related work will also be required to attend relevant additional training.

11.0 Asbestos Action Plan (Appendix 2)

- 11.1 Cloch Housing Association will produce a localised Action Plan including:

- Precise strategy for achieving targets set out in this management plan for surveying their assets.
- Local procedures for information sharing, ensuring that all staff, contractors and residents are aware of asbestos information which affects them, in particular with regard to responsive repairs.
- Access and updating of information on ACM`s including the Asbestos Register.
- The management of known ACM`s within all domestic and non domestic stock, including communal areas.
- A training plan for all front line staff, and additional training for any managers that may fall into the definition in point **10.4** above.
- How the planned maintenance programme will resonate with the requirement to have an asbestos survey carried out before commencing works.
- How the recommendations from an Approved Asbestos Consultant will be reviewed and instructing them according Cloch HA judgement of most appropriate action

11.2 The action plan should be reviewed regularly to check whether all requirements are being met, at least 6-monthly. All action plans will be refreshed at the point of review of the Asbestos Management Plan (see below).

12.0 Review of Asbestos Management Plan

12.1 The Asbestos Management Plan will be reviewed every three years or more frequently where there has been a change in legislation, or if arrangements within the plan are no longer considered to be adequate, in order to assess:

- Effectiveness of the management plan.
- Overall progress made against the Action Plans.
- Suitability and maintenance of communication, instruction, training of personnel, employees and contractors.
- Suitability and success of monitoring mechanisms.
- Any updates as a result of legislation changes or incidents.

12.2 Records of the review will be kept.

Appendix 1: Risk Assessment Algorithm

Priority assessment scoring schedule Aspect Score Description / examples

1. Normal occupant activity

Main Type of Activity

Rare Disturbance Activity **0** (Little used store rooms etc).

Low Disturbance Activity **1** Office type activity

Periodic Disturbance **2** (**Industrial** or vehicular activity which may contact ACM)

High Levels of Disturbance **3** (Fire door with asbestos insulating board in constant use).

Secondary Activities for Area (if applicable)

Rare Disturbance Activity **0** Little used store rooms etc.

Low Disturbance Activity **1** Office type activity

Periodic Disturbance **2** Industrial or vehicular activity which may contact ACM.

High Levels of Disturbance **3** Fire door with asbestos insulating board in constant use.

2. Likelihood of disturbance

Location

Outdoors **0**

Large Rooms or Well Ventilated Areas **1**

Rooms up to 100square metres **2**

Confined Spaces **3**

Accessibility

Usually Inaccessible **0** Usually inaccessible or unlikely to be disturbed.

Occasionally Likely to be Disturbed **1**

Easily Disturbed **2**

Routinely Disturbed **3**

Extent / Amount

Small Amounts **0** Strings, gaskets etc

< 10 **1** 10sq,m or 10m pipe run

> 10 but < 50 **2** >10sq.m to <50 sq.m or >10m to <50m pipe run

> 50 **3** >50 sq.m or >50m pipe run

Aspect Score Description / examples

3. Human exposure potential

Number of Occupants

None **0**

1 to 3 **1**

4 to 10 **2**

> 10 **3**

Frequency of Use

Infrequently **0**

Monthly **1**

Weekly **2**

Daily **3**

Average Use Time

< 1 Hour **0**

>1 but < 3 Hours **1**

> 3 but < 6 Hours **2**

> 6Hours

4. Maintenance activity

Type of Maintenance Activity

Minor Disturbance **0** Possibility of contact when gaining access etc.

Low Disturbance **1** Changing light bulbs in an asbestos ceiling etc.

Medium Disturbance **2** Lifting 1 or 2 asbestos insulating board ceiling tiles etc

High Disturbance **3**

Frequency of Maintenance Activity

Unlikely **0** ACM unlikely to be disturbed for maintenance

1 Per Year **1**

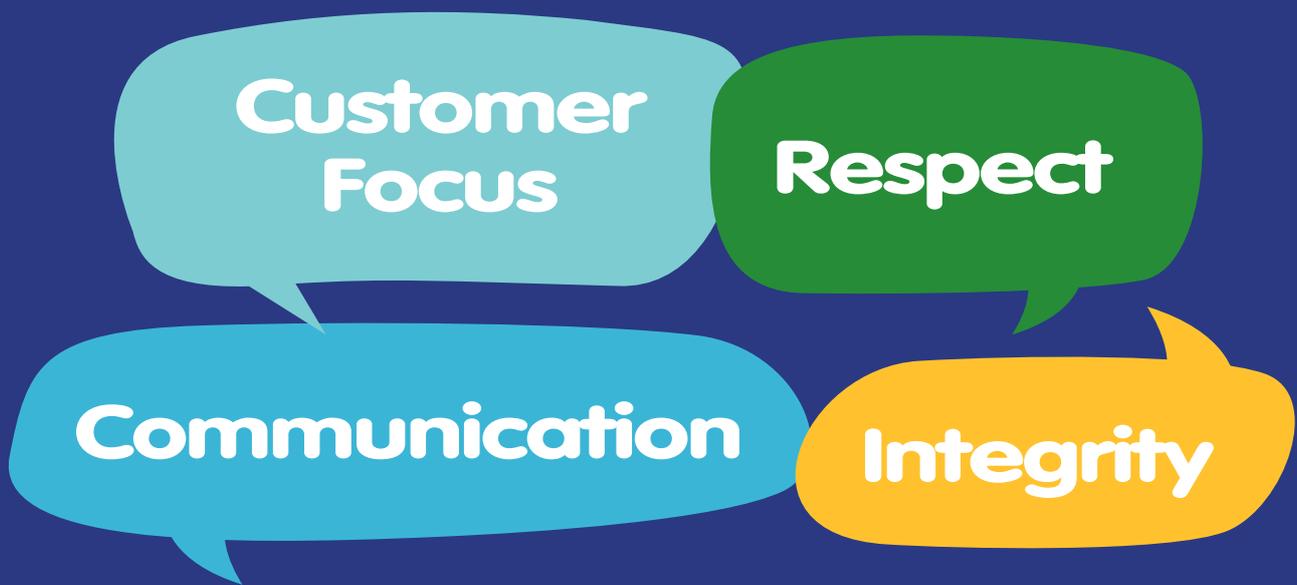
> 1 Per Year **2**

> 1 Per Month **3**

Appendix 2: Asbestos Action Plan

This action plan can be revised as required in lieu of amendments to legislation, codes of practice and other relevant standards.

Item No	Action	Timescale	Comments
1	Identify and instruct additional surveys for properties built up to 2000	By March 2015	Complete
2	Identify staff to carry out tasks (update register / SDM / letters etc)	By January 2015	Complete
3	Collate information on asbestos register to highlight properties with ACM`s	By January 2015	Complete & On-going
4	Ensure all future planned maintenance includes assessment for survey or checked against asbestos register if build date is pre-2000	On-going	On-going
5	Provide all contractors with a copy of register detailing ACM`s	By January 2015 and every March	Complete & provided to contractors at each new contract award
6	Identify all common and non domestic areas / properties that have an ACM and label & record on register	By January 2015	Complete and On-going
7	Provide all multiple occupancy buildings with a copy of an asbestos survey where applicable & record on register	By January 2015	To review if still in place Feb 2019
8	Identify and send notification letter to tenants where an ACM has been identified	By January 2015	Complete and On-going ie new tenants
9	Produce a staff training and awareness plan	By January 2015	Complete and reviewed when new staff are employed
10	Check accreditation of Asbestos Surveyors and Specialist contractors	Yearly and / or at time of appointment	Checked when new contractors are employed
11	Review Asbestos Action Plan (PSM)	Yearly	On-going
12	Review Asbestos Management Plan (PSM)	Every 3 years	On-going



CLOCH HOUSING ASSOCIATION LTD	
Policy Name	Asbestos Management Policy
Policy Category	PS
Policy Number	023
Date Adopted	01/11/2014
This Review	19/02/2019
Next Review	February 2022
Equalities Impact Assessment Required	
Link to other policies	Reactive Repairs, Void Management, Health & Safety.
Consultation	Internal
Need for Procedure	