



Policy: **Asbestos Management Policy**

Health & Safety

Approval: **September 2023**

Review Date: **September 2026**

Code: **H&S3**

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1. Purpose

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

2. References

- Health and Safety at Work etc. Act 1974
- Control of Asbestos Regulations 2012
- INDG 223 A Short Guide to Managing Asbestos in Premises
- HSG264 Asbestos: A survey guide

3. Asbestos Policy

The presence of an asbestos containing material in itself does not constitute a danger. However, there is a potential risk to health if such material is disturbed and damaged. An isolated accidental exposure to asbestos fibres for a short duration is extremely unlikely to result in the development of asbestos related diseases. However, regular exposure – even at relatively low levels – can present a risk. As well as people employed in the building trades, inadvertent exposure (and consequent risk) can occur in other groups of people e.g. installers of burglar alarms, smoke detectors, etc. Maintenance and repair contracts will also take place in the future and it is important, therefore, to have in place a management system which minimises the potential for exposure to asbestos.

Working with and managing asbestos materials is now very tightly regulated via a number of different Legislative provisions. The purpose of this Policy is to ensure that BHA complies with all current Legislation, Codes of Practice and Health and Safety Executive Guidance Notes.

3.1 Statement of Intent

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

3.2 Policy Statement

This Asbestos Policy conforms to the Health and Safety at Work etc. Act 1974 and the Control of Asbestos Regulations 2012. The Policy and

Procedures will apply to all buildings and all individuals employed by the Association, to contractors/subcontractors engaged by Blochairn Housing Association and to the Associations tenants.

The Blochairn Housing Association Policy on asbestos is to:

- 1) Ensure the prevention of exposure to risks associated with asbestos containing materials.
- 2) Ensure that any asbestos containing materials that may be present in any of its buildings are maintained in a condition to prevent the possibility of any harm to health occurring.
- 3) Promote awareness of the risks from asbestos containing materials and the Management Procedures through training and induction of relevant staff. Key staff involved in the delivery of this Policy will receive annual re-training.
- 4) Provide adequate resources to ensure the provision of appropriate information, instruction and training.
- 5) Ensure a commitment to comply with all relevant asbestos legislation, Approved Codes of Practice, Health and Safety Executive Guidance Notes and to commit to the safe disposal of any asbestos waste in accordance with the appropriate legislation.
- 6) Ensure that an appropriate asbestos surveying process remains in place, taking account of the need for Asbestos Management, Refurbishment and Demolition Surveys in accordance with current legislation and maintain an Asbestos Register.
- 7) Implement an effective asbestos management strategy in order that appropriate measures such as encapsulation, labelling, inspection, working with, or removal of, the material can be undertaken.
- 8) Ensure that an appropriate system is installed, maintained and implemented for the management of all asbestos containing materials identified in the Register. Such a system is to be capable of recording the risk, the needs and priorities for treatment and/or removal.
- 9) Ensure that all Contractors and Sub Contractors engaged to carry out work on any of the Organisation's buildings are provided with adequate information on asbestos, which may be disturbed by their works.
- 10) Ensure that information regarding the presence of asbestos is contained in tender documentation as may be appropriate.
- 11) Ensure Licensed Contractors and/or Sub Contractors carry out ALL Asbestos Major Works and Competent Contractors carry out all Asbestos Minor Works.
- 12) Ensure all Non – Licensed Contractors carrying out Asbestos Minor Works are trained in safe working procedures and have appropriate insurance cover for the work being carried out.
- 13) Ensure that relevant staff of Blochairn Housing Association and contractors (as identified by a Training Needs Analysis) have appropriate training in this Policy and Procedures.

14) Regularly review the Asbestos Management Policy and Procedures.

4. Asbestos Roles

- 4.1 Whilst the Director of Blochairn Housing Association will have responsibility for the overall asbestos management system, the Association will define and allocate roles and responsibilities to ensure the fulfilment of the policy and procedures on a practical level.
- 4.2 The defined roles will include an Asbestos Co-ordinator, who will be tasked with maintaining the Asbestos Register and for co-ordinating asbestos surveys and sampling as well as asbestos removal/remediation works. This role will also include liaison with 'non-asbestos' works contractors, ensuring that all appropriate asbestos information is provided and/or obtained and properly interpreted where works are liable to disturb the fabric of buildings.
- 4.3 The following Table 1 summarises the association's structure of responsibilities to ensure that those with the most appropriate daily operational functions can manage, supervise, and carry out asbestos related control measures as appropriate.

Management Committee	<ul style="list-style-type: none"> The Management Committee are collectively responsible for providing leadership and direction on Health and Safety matters. The Asbestos Management Policy is approved by the Management Committee and its effectiveness periodically reviewed
Director	<ul style="list-style-type: none"> The Director will hold ultimate responsibility for the development and implementation of the Asbestos Management Policy.
Operations Manager – Asbestos Coordinator	<ul style="list-style-type: none"> Responsible for operational responsibility. Implementation of operational procedures for the management and control of asbestos during investment

	<p>activities and day-to-day maintenance activities.</p> <ul style="list-style-type: none"> • Ensuring the associations' asbestos register is updated on completion of any works on asbestos containing material. • Informing all staff, Contractors and Sub Contractors and residents (where appropriate) as to the presence of any asbestos containing materials known to have been affected by any works. • Authorisation of employing contractors in relation to all asbestos related works • Reporting to the Management Committee any recommendations for policy review • Organising relevant training for staff members • Identifying and being the first point of contact for any non-conformances and policy breaches. • Authorising asbestos surveys
All operational staff	<ul style="list-style-type: none"> • All persons employed by BHA, ensuring that any works that may disturb or damage known asbestos containing materials is avoided. • Report to the Asbestos Co-ordinator any materials suspected of containing asbestos, where the material has become disturbed and/or damaged.

5. Training & Development

5.1 Asbestos awareness training will be given to all the association's staff who may encounter asbestos materials within their day-to-day work, or who supervise such work.

- 5.2 Training on the revised Asbestos Management Policy and Procedures will be given to all associations' staff who supervise such work and be open to other staff as part of their own personal development plan.
- 5.3 Refresher training on asbestos awareness will be offered every year to all with responsibilities in this area.
- 5.4 The following Table 2 defines an outline-training matrix applicable to all BHA staff involved in the Asbestos Management Policy and Procedures.

Training	Management Committee	Director	Asbestos Co-ordinator	All Operational staff
Asbestos awareness	X	X	X	X
Training on asbestos policy and procedures	Optional	Optional	X	X
Training on roles and responsibilities	X	X	X	X
Interpreting asbestos surveys	Optional	Optional	X	X
Duty to manage asbestos	Optional	Optional	X	Optional

6. Prohibition on Staff Handling Asbestos

- 6.1 Unless properly trained to do so, no Blochairn Housing Association staff will be permitted to handle or work on asbestos containing materials (ACM's).

7. Identification of Suspect Material – Damaged, Disturbed or Previously Unidentified

- 7.1 It is the responsibility of all staff to report to the Asbestos Co-Coordinator if they suspect that disturbed or damaged asbestos containing materials may be present in a building owned or occupied by the Association. In a case where an accessible material is suspected of containing asbestos, and where this material may reasonably *become* disturbed, this would also apply.
- 7.2 In such cases, an external consultant having UKAS (United Kingdom Accreditation Service) accreditation for asbestos sampling and analysis will be contacted to carry out identification.

- 7.3 If asbestos is identified within the sample, advice will be obtained from a competent consultant on the appropriate course of action.
- 7.4 Where damage to any material known to contain asbestos has taken place, and is likely to give rise to airborne respirable fibre release, the Asbestos Co-coordinator will arrange for isolation of the area pending an investigation. S/he will arrange for air monitoring tests (measurement of airborne fibre concentrations) to be carried out and sampling and analysis will be carried out by an independent UKAS accredited Organisation to determine the level of any potential contamination, or to provide reassurance that unacceptable contamination has not occurred.
- 7.5 Details of air test results will be made available for inspection and record purposes.
- 7.6 Remedial action will be required when airborne fibre levels **exceed 0.01 f/cc**. The nature of the remedial work must be agreed with the Director.
- 7.7 When remedial action becomes necessary after exposure, the relevant facts may have to be reported to the HSE in accordance with the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR). (Advice may be sought from a competent Asbestos Consultant to determine whether the incident is in fact RIDDOR reportable.)

8. Asbestos Surveys and Management Plans – Normal Occupancy of Premises

- 8.1 Where Organisation premises and common areas of housing stock were built or renovated prior to 2000, an Asbestos Management Survey programme will be carried out by a competent UKAS accredited asbestos management consultancy. (HSE expects that no asbestos containing materials would be in use from 2000.) The surveyor and the Organisation should jointly determine an appropriate strategy to cost-effectively assess relevant premises, taking account of the permissibility of ‘representative’ surveying across properties of the same archetype and construction date.

Note that current legislation does not subject ‘domestic dwellings’ to the requirement for Asbestos Management Surveys (although Refurbishment and Demolition Surveys are required – see below). However, the Organisation will take a view on whether to adopt the increasingly common stance of undertaking Management Surveys to domestic dwellings.

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

premises.

8.3 We will manage our asbestos using the following plan

Action	Frequency/ responsibility
We will record all actions relating to asbestos within our register, while expanding our knowledge through expanding our sampling programme	Adhoc as required/ Operations Manager
We will audit register entries to establish trends indicating the need for further testing	Annually/ Operations Manager
We will adhere to management and risk advice contained within relevant asbestos surveys	Ongoing/ Operations Manager
We will commission external experts to re inspect locations of known asbestos to ensure fabric has not become damaged or disturbed and act on any recommendations and record in our register	Annually/ Operations Manager to arrange
This Asbestos Management Policy review is carried out in accordance with the associations policy review programme agreed with the Management Committee. This policy will be subject to review in three years.	Every 3 years/ Operations Manager, Management Committee
If there, are significant changes to legislation or regulation or there are found to be deficiencies or failures in this policy an immediate review will be initiated by the Director.	Adhoc as required/ Director
We will include asbestos management within the suite of resident Health and Safety policies, which will be compliance assessed as part of our ongoing internal audit function.	Every 3 years/ Operations Manager to arrange
We will ensure our electronic records and systems enable us to provide relevant asbestos information to contractors and tenants	Ongoing/ Operations Manager
As part of our contractor due diligence process, we will ensure all operatives have completed asbestos awareness training as a minimum requirement. This	Ongoing/ Operations Manager

applies both to reactive and planned maintenance.	
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- 8.4 The “Asbestos Co-ordinator” will be responsible for maintaining the Registers and Plans, organising surveys and re-inspections, etc.

9. Tenant Information

- 9.1 We will provide general information on asbestos, the known risks and a reminder of tenants’ contractual tenancy obligations such as not disturbing the fabric of the building and seeking approval prior to any alteration works, which may inadvertently disturb asbestos containing materials. This will be done annually using our quarterly newsletter.
- 9.2 Where we are aware of asbestos containing materials within individual dwellings, we will provide this information to tenants with carefully chosen wording to ensure there is no risk to health.

10. Asbestos Surveys – Prior to Work on Premises

- 10.1 Prior to any work being carried out on the fabric of (pre-2000) buildings, the asbestos register will be interrogated to determine whether asbestos may be encountered and appropriate precautions (including the use of HSE licensed contractors where necessary) will be taken. Where the works are likely to disturb material not included in the registers (e.g. behind wall panels, within voids, etc.), 8.2 will apply.
- 10.2 Prior to any refurbishment, demolition or repair works on building fabric, which is not known to be asbestos free, a competent UKAS accredited asbestos management consultancy will be commissioned to carry out a ‘Refurbishment or Demolition’ (i.e. intrusive) asbestos survey of the area to be worked upon. The surveyor and the Organisation should jointly determine an appropriate strategy to cost-effectively assess relevant premises, taking account of the permissibility of ‘representative’ surveying across properties of the same archetype and construction date.
- 10.3 Prior to works starting, the information obtained from Refurbishment/Demolition Surveys will be discussed with the proposed works contractor (or internal direct works staff) to ensure that ACM’s will not be disturbed by their works. In the event that works would have the potential to disturb ACM’s, appropriate measures will be taken, including the prior removal of ACM’s, amendments to work programme, etc.

- 10.4 Records of all surveys and discussions with contractors will be retained in the Job File to demonstrate that asbestos was properly considered and appropriate actions taken to prevent disturbance and exposure.

11. Purchasing Future Assets

- 11.1 On occasion the Association may be presented with the opportunity to purchase additional stock. If consideration is being given to purchase properties built before the year 2000 and/or any brownfield land then relevant asbestos identification will be undertaken as part of the due diligence process.

12. Work with Asbestos Materials

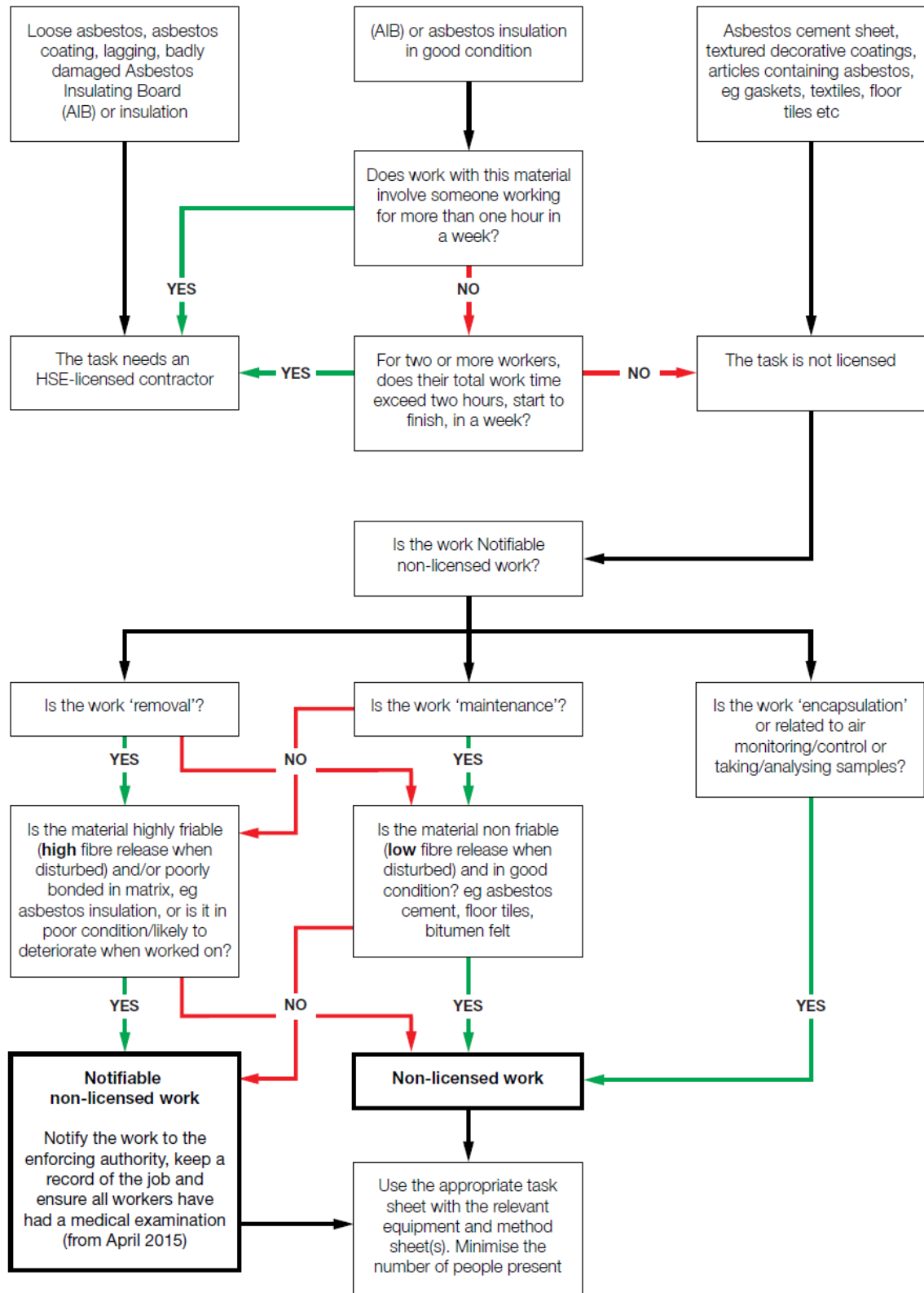
- 12.1 Most work likely to disturb or remove asbestos must be carried out by an HSE licensed asbestos removal contractor and notified to the HSE 14 days prior to commencement. However, the Control of Asbestos Regulations 2012 does allow work with certain lower risk asbestos containing materials (e.g. asbestos cement and asbestos textured coatings) to be carried out by non-licensed personnel and without notification to the HSE. The three categories of asbestos work are:

- Major Works: Licensed works – 14 day notification and licenced contractor (highest risk work)
- Minor Works: Notifiable non-licensed works – notification before works start and competent (non-licensed) contractor
- Minor Works: Non-notifiable non-licensed works – no notification and competent (non-licensed contractor)

The following HSE flowchart shows the decision making process on appropriate classification of works:

Decision flow chart

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



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

13. Tenant Information and Work Procedures

- 13.1 The Organisation will establish its policy on informing tenants of the possibility of ACM's being present in pre-2000 housing and on the requirements for undertaking work on their dwellings. Any such information will be subject to a formal distribution procedure.
- 13.2 Prior to a tenant starting work which will interfere with the fabric and/or services of a property, tenants will be required to seek advance permission from the Organisation. Before issuing permission, the Asbestos Register will be consulted and, where ACM's are identified within the proposed work zone the Maintenance Team will liaise with the tenant to ensure all appropriate actions are taken. Where the asbestos data is inconclusive (e.g. where a Refurbishment Survey has not been carried out, the Organisation will review the request and decide whether to refuse permission or to arrange for a Refurbishment Survey to be carried out.
- 13.3 In the event that tenants' works are liable to disturb ACM's, the Organisation will make a decision on the appropriate course of action, ensuring that all asbestos works are subject to the normal asbestos work procedures of the Organisation.

14. Equalities

- 14.1 Blochairn Housing Association is committed to promoting an environment of respect, understanding, encouraging diversity and eliminating discrimination by providing equality of opportunity for all. Throughout the Association, there will be a consistent approach in promoting equality and diversity across all areas. We will ensure that our monitoring of the policy has due regard to our equal opportunities policy.