



Asbestos Management Plan

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1. Asbestos policy and statement of intent

Our asbestos policy is available to all colleagues on the intranet. The asbestos policy outlines our aims and objectives in relation to asbestos management.

The following statement outlines how we will manage the risk posed by asbestos containing materials (ACMs) and materials presumed to contain asbestos in homes, communal areas, commercial premises, offices, depot, garages, outbuildings and other properties in premises owned, managed, or controlled by us (hereafter referred to collectively as properties or premises for the purpose of this plan).

We will aim to meet our statutory obligations and ultimately the Control of Asbestos Regulations 2012 and associated Approved Codes of Practice and Guidance notes produced by the Health & Safety Executive (HSE) through the implementation of our asbestos policy and asbestos management plan.

We are committed to protecting all residents, colleagues, contractors and visitors from health and safety risks associated with ACMs in all our premises.

We intend to implement the policy through procedural arrangements laid down in our asbestos management plan and relevant procedures.

All colleagues have a duty of care to work in a safe manner and comply with the policy requirements in relation to their work activities. Third party service providers and contractors are also required to meet certain obligations and responsibilities, as defined by statutory requirements and the asbestos policy, when carrying out activities involving ACMs in our premises.

We will implement procedures to prevent, in as far as is reasonably practicable, ACMs giving rise to health risks in our premises.

To achieve and maintain effective management of risk posed by ACMs, we will comply with the requirements of the Control of Asbestos Regulations 2012 (CAR 2012) and follow supplementary HSE Approved Codes of Practice and Guidance notes. In achieving compliance our aims are to:

- provide safe premises and places to work
- comply with statutory obligations
- meet industry best practice.

Where we hold certain duties as 'duty holder', as defined in CAR 2012, any premises constructed prior to 2000 will be assessed for ACMs and suitable risk assessments carried out.

Findings from these assessments will be recorded in the asbestos register (Vision) and where necessary, control and management actions will be taken to manage, remove or treat ACMs in order to eliminate or minimise risk of exposure to asbestos airborne fibres. Details of assessment methodology and options for remedial action are set out in this management plan.

Our re-survey program will be based on risk assessment, taking account of the material found and the likelihood of disturbance.

Adequate training, instruction and awareness will be provided for all colleagues who need to be involved in the safe management of ACMs. This can be found in Section 24 of the Asbestos Management Plan. Any other person likely to be at risk from ACMs will be provided with suitable information on the location and associated risk of ACMs in our premises. This includes both contractors and our residents.

Competent persons will be appointed to provide specialist services to meet the requirements of this policy.

We employ specialist contractors to undertake many asbestos-related activities on our behalf. This includes surveying, removal and disposal of asbestos. It is the careful design of contracts and robust contract management that enables us to fulfil our responsibilities for asbestos safety.

We will ensure our contractors are suitably competent and have policies, procedures and adequate training in place relating to asbestos management.

2. Background to Asbestos

Asbestos is a naturally occurring mineral. There are six main types of asbestos, three of these were predominantly used in Great Britain: crocidolite (blue), amosite (brown) and chrysotile (white). All asbestos types are defined as category 1 carcinogens i.e. 'substances known to cause cancer in humans'.

In the past asbestos and asbestos products have been used in the construction and insulation of our premises. They were used for a variety of purposes and were considered ideal for fireproofing and insulation. Any building, plant or machinery built before 2000 may contain asbestos due to the final prohibition occurring in November 1999. ACMs in good condition do not present a significant risk unless asbestos fibres become airborne, which happens when materials are damaged or disturbed.

Inhalation of asbestos fibre can lead to asbestos related diseases which represent the single greatest cause of work-related deaths in the UK. The diseases are mainly cancers of the chest and lungs and there is usually a long delay between first exposure and the onset of disease. There is no cure for asbestos related diseases.

3. Legislation, regulation, codes of practice and guidance

The primary legislation referred to is as follows:

- The Health and Safety at Work etc. Act 1974 (HASAWA)
- The Management of Health and Safety at Work Regulations 1999 (as amended)
- The Construction Design and Management Regulation 2015 (CDM)
- The Control of Asbestos Regulations (CAR 2012)
- The Defective Premises Act 1972
- Housing Act 2004
- Landlord and Tenant Act 1985
- Homes (Fitness for Human Habitation) Act 2018
- Housing Health and Safety Rating System
- Awaab's Law 2024

CAR 2012 is supported by a number of approved codes of practice (including HSG 247, HSG 248, HSG264 and HSG 227). The broad duties under regulation 4 the 'duty to manage' in non-domestic premises are summarised as follows:

- Take reasonable steps to find out if there are materials containing asbestos in non-domestic premises, and if so, its amount, where it is and what condition it is in.
- Presume materials contain asbestos unless there is strong evidence that they do not.
- Make, and keep up-to date, a record of the location and condition of asbestos containing materials – or materials which are presumed to contain asbestos.
- Assess the risk of anyone being exposed to fibres from the materials identified.
- Prepare a plan that sets out in detail how the risks from these materials are managed; take the necessary steps to put the plan into action.
- Periodically review and monitor the plan and the arrangements to act on it so that the plan remains relevant and up-to date.
- Provide information on the location and condition of the materials to anyone who is liable to work on or disturb them.
- Require anyone to co-operate as far as is necessary to allow the Compliance manager to comply with the above requirements

4. Roles and Responsibilities

Roles and overall responsibilities in relation to asbestos are summarised in the following section.

4.1 Board

Strategic overview of all Housing Solutions policies

4.2 Chief Executive

Overall responsibility for the Asbestos Policy and Management Plan in line with the corporate strategy.

4.3 Director of Property and Development

Executive responsibility for asbestos management lies with the Director of Property and Development who is the appointed 'duty holder' for Housing Solutions as identified in CAR 2012.

Their role is to be accountable for ensuring that we fulfil our legal and regulatory responsibilities in respect of asbestos safety. In doing so, they are expected to take appropriate measures to fulfil these responsibilities and keep the chief executive and the board informed of any such issues as and when they arise.

4.4 Assistant Director of Property

Ensure that all persons are provided with the necessary information, instruction and training to fulfil their roles and responsibilities under this policy and procedures.

Overall accountability for the management of asbestos, including for the day to day management and delivery of the compliance programme,

They will ensure that satisfactory measures are in place and keep the Director of Property and Development informed of any such issues as and when they arise.

4.4 Head of Repairs

Ensuring both the DLO and contractors follow the asbestos policy and management plan and both DLO staff and contractors have suitable training and competency.

Regular liaison with contractors in the completion of inspections and the completion of remedial works, they are expected to assist the 'duty holder' in fulfilling their role.

They will also ensure that asbestos surveys are carried out at void properties in accordance with this management plan.

They will keep the Assistant Director of Property informed of any such issues as and when they arise and retain responsibility for works commissioned through to resolution.

4.5 Head of Development

Overall accountability for ensuring that new properties we are developing or acquiring from a third party meet legal, regulatory and contractual requirements for asbestos safety at practical completion sits with the lead growth partner (new homes & regeneration). They also ensure new homes are delivered to colleagues for onward management with an appropriate handover.

The Head of Development is also responsible for asbestos safety in relation to any homes that are designated as a regeneration scheme. That may include the demolition, replacement or major refurbishment of homes within a designated scheme. It will also include any empty homes that are pending demolition or refurbishment or disposal.

They will ensure that satisfactory measures are in place and keep the Director of Property and Development informed of any such issues as and when they arise.

4.6 Assistant Director of Housing and Resident Engagement

Overall accountability for managing relationships with residents, including residents, leaseholders and shared owners, in respect of asbestos safety, including the issue of an asbestos survey advising where asbestos is located in the property upon sign up. Where Asbestos Contained Materials have been disturbed, work with our residents as detailed in the emergency plan and where required arrange a decant of the property.

They will ensure that satisfactory measures are in place and keep the Director of Property and Development and the Director of Resident Services and Community informed of any such issues as and when they arise.

4.7 Head of Fire and Compliance

The Head of Fire and Compliance has overall responsibility in relation to the operational management of asbestos in assets owned, managed or occupied by us. They are regarded as the 'competent person' and have been designated the 'asbestos responsible person'.

The Head of Fire and Compliance is responsible for the following:

- Acting as a point of reference for Housing Solutions in respect to asbestos policy issues.
- Reporting asbestos safety incidents to the HSE as required and for managing contact with the HSE and other statutory bodies.
- Ensuring that these are readily available and communicated, as appropriate, to colleagues, residents, people who work on our behalf, and members of the public who live in our homes or visit our properties.
- Maintaining and ensuring that the asbestos policy and management plan (plus any supporting procedures, guidance and notices) are kept up to date in terms of legislation, regulations, codes of practice and organisational practice.
- Dealing with the questions and concerns of colleagues, residents, people who work on our behalf and visitors in relation to asbestos management.
- Providing advice and guidance to all colleagues in relation to:
 - o legislative and regulatory requirements
 - o training needs of colleagues
 - o materials and PPE equipment used to protect colleagues.
- Managing the risk shall include adequate measures for:
 - o monitoring the condition of any asbestos or any substance containing or suspected of containing asbestos
 - o ensuring any asbestos or any such substance is properly maintained or where necessary safely removed
 - o ensuring that information about the location and condition of any asbestos or any such substance is:
 - provided to every person liable to disturb it including the residents living within the property
 - made available to the emergency services
 - o ensuring that the plan and records are updated when ACMs are repaired or

removed in line with regulation 4 (9) CAR 2012.

- Providing support and guidance for all projects and capital investment programmes in relation to the CDM role relating to the main contractors' health and safety plan for the removal/disposal of materials within our properties.
- Having overall responsibility for maintaining the electronic asbestos register and ensuring that the register is updated correctly and available to all that should require access.
- Ensuring that the asset management system includes all identified risks based on a risk score and that the risk register produced is accurate and includes a prioritised risk list for all assets.

4.8 Health & Safety Manager

The Health & Safety Manager has the overall responsibility for ensuring the effectiveness of our management of asbestos.

The Health & Safety manager is responsible for the following:

- Ensuring that the operational requirements of the asbestos policy and asbestos management plan are being adhered to.
- Ensuring through monitoring that we fully comply with legal and regulatory requirements and codes of practice in respect of asbestos management and disturbance in any of our operations.
- Being aware of any impending changes in asbestos legislation, regulations and codes of practice which may affect policies, management plans and procedures and through reporting enable the executive board and the board to be aware of any impact this may have on policy or compliance.
- Dealing with the questions and concerns of colleagues, residents, people who work on our behalf and visitors in relation to asbestos management.
- Acting as the 'deputy responsible person' and deputising for the asbestos responsible person in the absence of the compliance manager.

4.9 Compliance Manager

The compliance manager will support the Head of Fire and Compliance in the relation to the operational management of asbestos in assets owned, managed or occupied by us.

The compliance manager is responsible for the following:

- Managing the programme of asbestos surveying and subsequent re-inspection programme based on risk score.
- Acting as a point of reference for Housing Solutions in respect to asbestos policy issues.
- Reporting asbestos safety incidents to the HSE as required and for managing contact with the HSE and other statutory bodies.
- Ensuring that these are readily available and communicated, as appropriate, to colleagues, residents, people who work on our behalf, and members of the public who live in our homes or visit our properties.

- Maintaining and ensuring that the asbestos policy and management plan (plus any supporting procedures, guidance and notices) are kept up to date in terms of legislation, regulations, codes of practice and organisational practice.
- Dealing with the questions and concerns of colleagues, residents, people who work on our behalf and visitors in relation to asbestos management.
- Reviewing the assessments made forthwith if there is reason to suspect that the assessment is no longer valid regulation 4 (6) (a) CAR and there has been a significant change in the premises to which the assessment relates. regulation 4 (6) (b) CAR.
- Ensuring that the conclusions of the assessment and every review are recorded in line with regulation 4 (7) CAR 2012.
- Providing advice and guidance to all colleagues in relation to:
 - legislative and regulatory requirements
 - training needs of colleagues
 - materials and PPE equipment used to protect colleagues.
- Where the assessment shows that asbestos is, or is liable to be, present in any part of the premises, ensuring that:
 - a determination of the risk from asbestos is made
 - a written plan identifying those parts of the premises concerned is prepared
 - the measures which are to be taken for managing the risk are specified in the written plan in line with regulation 4 (8) CAR 2012.
- Managing the risk shall include adequate measures for:
 - monitoring the condition of any asbestos or any substance containing or suspected of containing asbestos
 - ensuring any asbestos or any such substance is properly maintained or where necessary safely removed
 - ensuring that information about the location and condition of any asbestos or any such substance is:
 - provided to every person liable to disturb it including the residents living within the property
 - made available to the emergency services
 - ensuring that the plan and records are updated when ACMs are repaired or removed in line with regulation 4 (9) CAR 2012.
- Managing and supervising all asbestos related removal and associated works to include verification checks to confirm all required documentation and evidence is uploaded and archived.
- Maintaining records for approved licensed asbestos removal, surveying, sampling and testing contractors; review their licenses and insurances on an annual basis.
- Undertaking regular contract review meetings alongside monitoring agreed KPIs and providing feedback where required.
- Monitoring the arrangements for the transporting and disposal of asbestos waste.
- Providing support and guidance for all projects and capital investment programmes in relation to the CDM role relating to the main contractors' health and safety plan for the removal/disposal of materials within our properties.

- Having overall responsibility for maintaining the electronic asbestos register and ensuring that the register is updated correctly and available to all that should require access.
- Ensuring that the asset management system includes all identified risks based on a risk score and that the risk register produced is accurate and includes a prioritised risk list for all assets.

4.10 Assistant Director of People Services

Overall accountability for ensuring that all relevant colleagues receive training in relation to asbestos management sits with the Assistant Director of People Services. This includes awareness training for the majority of colleagues and specialist training for colleagues who are responsible for managing asbestos on a day to day basis.

The Assistant Director of People Services is accountable for ensuring that training records are maintained and ensuring that asbestos safety training needs will be assessed annually, as a minimum.

They will ensure that satisfactory measures are in place and keep the Director of Property and Development informed of any such issues as and when they arise.

4.11 Asset Management – DLO Supervisor(s)

All DLO Supervisors have a duty to observe and comply with our asbestos policy and management plan (and any supporting procedures, guidance or notices) issued on asbestos management.

All DLO Supervisors are responsible for undertaking asbestos awareness training and specialist training. They are also responsible for raising any training needs they consider themselves to have with their line manager.

All DLO Supervisors are responsible for

- Ensuring all DLO Colleagues have read and understood the Asbestos Policy and Asbestos Management Plan.
- All DLO Colleagues are able to access the Asbestos Portal (Vision).
- All Repair or Refurbishment Contractors are able to access the Asbestos Portal (Vision) and have been provided with this pre-construction information, before starting works.
- Requesting the appropriate level of asbestos survey for the works tasks being undertaken as detailed in Section 9.
- Reviewing of Asbestos Portal (Vision) User Log, to confirm all DLO colleagues are accessing the data.

4.12 Asset Management – DLO

All DLO colleagues have a duty to observe and comply with our asbestos policy and management plan (and any supporting procedures, guidance or notices) issued on asbestos management.

All DLO colleagues are responsible for undertaking asbestos awareness training and specialist training. They are also responsible for raising any training needs they consider themselves to have with their Supervisor.

All DLO colleagues before undertaking a repair at a property must,

- Check if the property / building was built or refurbished before the year 2000.
- If the property / building was built or refurbished before the year 2000 or if the build date is unknown. DLO colleagues must review the Asbestos Portal (Vision). If no data is present works must be stopped and an asbestos survey requested via the Works Planner. The appropriate level of asbestos survey for the works tasks being undertaken as detailed in Section 9.
- If the age of the property cannot be determined or the DLO colleague has any concerns regarding asbestos, work must be stopped and reported to their Supervisor so that the Asbestos Policy and Asbestos Management Plan can be implemented.
- Plan the job, if possible, to avoid disturbing asbestos. If this is not possible, work must not start and must be reported to their supervisor so that the Asbestos Policy and Asbestos Management Plan can be implemented.

Any DLO colleague that is present in one of our properties and becomes aware of any issue related to the property (including communal areas, garages, stores and surrounding area) that could impact upon any aspect of asbestos management should promptly raise this with their Supervisor.

Any DLO colleague that has an asbestos-related action which has been assigned to them, must ensure that they are completed on time and to the required standard, for example, remedial actions following an asbestos survey or risk assessment. Any risk that a remedial action will not be completed on time must be reported the responsible person.

4.13 Asset Management – Works Planners

All works planners have a duty to observe and comply with our asbestos policy and management plan (and any supporting procedures, guidance or notices) issued on asbestos management.

All Works Planners are responsible for

- Requesting the appropriate level of asbestos survey for the works tasks being undertaken as detailed in Section 9.
- Where requested from a DLO Colleague providing a copy of the asbestos survey information held in asbestos portal (Vision).

Any Works Planner that becomes aware of any issue related to the property (including communal areas, garages, stores and surrounding area) that could impact upon any aspect of asbestos management should promptly raise this with their Supervisor.

4.14 Asset Management – Compliance Coordinator

The Compliance Coordinator has a duty to observe and comply with our asbestos policy and management plan (and any supporting procedures, guidance or notices) issued on asbestos management.

The compliance coordinator will assist the Compliance Manager in relation to the operational management of asbestos in assets owned, managed or occupied by us.

The Compliance Coordinator is responsible for the following

- Managing and supervising all asbestos related removal and associated works to include verification checks to confirm all required documentation and evidence is uploaded and archived.
- Maintaining records for approved licensed asbestos removal, surveying, sampling and testing contractors; review their licenses and insurances on an annual basis.
- Attending regular contract review meetings alongside monitoring agreed KPIs and providing feedback where required.
- Requesting the appropriate level of asbestos survey for the works tasks being undertaken as detailed in Section 9.

4.15 Asset Management Administrator

The Asset Management Administrator have a duty to observe and comply with our asbestos policy and management plan (and any supporting procedures, guidance or notices) issued on asbestos management.

The Asset Management Administrator shall support the Compliance Manager and Health Safety Manager with management of contractors. This will include the following;

- Ensuring all contractors have submitted insurance details and these are held on file. Where this has not been received in advance of renewal date this is raised with the Housing Solutions nominated Contract Manager.
- All contractors have submitted evidence of Asbestos Awareness Training for operatives working at Housing Solutions properties. Where this has not been received this is raised with the Housing Solutions nominated Contract Manager.

4.16 Other Colleagues

All colleagues have a duty to observe and comply with our asbestos policy and management plan (and any supporting procedures, guidance or notices) issued on asbestos management.

All colleagues are responsible for undertaking asbestos awareness training and specialist training, depending on their role. They are also responsible for raising any training needs they consider themselves to have with their line manager.

Any colleague that is present in one of our properties and becomes aware of any issue related to the property (including communal areas, garages, stores and surround estate) that could impact upon any aspect of asbestos management should promptly raise this with the Compliance Manager or the Surveying Service Manager (planned works) or Head of Repairs or any other senior manager.

Any colleague that is visiting, meeting, corresponding or speaking with a resident and becomes aware of any issue related to the capacity or capability of the resident that could impact on any aspect of asbestos safety should promptly raise this with one of the Housing Officer or the Housing Services Manager or any senior manager in their absence.

Any colleague that has an asbestos-related action which has been assigned to them, must ensure that they are completed on time and to the required standard, for example,

remedial actions following an asbestos survey or risk assessment. Any risk that a remedial action will not be completed on time must be reported the responsible person

4.17 Contractors

All Contracts have a duty to observe and comply with our asbestos policy and management plan (and any supporting procedures, guidance or notices) issued on asbestos management.

All Contractors are responsible for undertaking asbestos awareness training and specialist training.

All Contractors before undertaking a repair at a property must,

- Check if the property / building was built or refurbished before the year 2000.
- If the property / building was built or refurbished before the year 2000, or if the build date is unknown. Contractors must review the Asbestos Portal (Vision). If no data is present works must be stopped and an asbestos management survey requested via the Housing Solutions colleague ordering the works. If the age of the property cannot be determined or the contractor has any concerns regarding asbestos, work must be stopped and reported to their Housing Solutions Colleague so that the Asbestos Policy and Asbestos Management Plan can be implemented.
- Plan the job, if possible, to avoid disturbing asbestos. If this is not possible, work must not start and must be reported to their Housing Solutions colleague so that the Asbestos Policy and Asbestos Management Plan can be implemented
- Any Contractor that is present in one of our properties and becomes aware of any issue related to the property (including communal areas, garages, stores and surrounding area) that could impact upon any aspect of asbestos management should promptly raise this with the Housing Solutions colleague ordering the works.

5. Governance and Assurance

Our health and safety governance arrangements are set out in our Health & Safety policy.

6. External advice and assurance

We have appointed ACMS UK Ltd to provide independent advice and assurance on all aspects of asbestos safety. ACMS UK Ltd fulfils the role of ‘competent advisor’ in respect of asbestos management due to its skills, training and experience.

7. Management Arrangements

A management survey will be undertaken in accordance with HSG 264 The Survey Guide, to provide an accurate record of the location and condition of ACMs.

The survey report is held electronically on our asset management system ‘The asset management system’. The asbestos survey report contains data sheets for each ACM, including images and a set of marked up plans showing the location and extent of known or presumed ACMs.

An electronic asbestos register within The asset management system has been compiled to show the location(s) of all known or presumed asbestos containing materials (ACMs).

This written plan has been documented following the guidance within HSG 227 (a comprehensive guide to managing asbestos in premises) to calculate the priority score risk assessments for each presumed or known asbestos containing material. The calculation of the priority assessment scores is undertaken by the asbestos responsible person.

After calculation of the priority risk scores, a programme of work has been documented to manage the risks from ACMs. Areas of highest risk that cannot have access restricted or be isolated shall receive the earliest attention and strictest management.

In addition to actions within the plan to prevent the release of asbestos fibres into air, the written plan includes preventive management actions for colleagues, contractors, and others.

Information contained in the asbestos register will be made available on request to all, residents, colleagues, and health and safety representatives and contractors as necessary.

The asbestos responsible person shall ensure that the asbestos register is readily available. All managers who are instructing works or managing contractors to work in our properties are responsible for ensuring that the contractor has access to the asbestos register prior to the commencement of any building maintenance or refurbishment works.

Prior to any maintenance or refurbishment works that disturbs the fabric of the building, a refurbishment/demolition survey in accordance HSG 264 will be carried out.

8. Managing Asbestos In Premises

Generally, we have adopted the following management options for known ACMs:

- **Monitor:** Periodic inspections depending upon the risk priority will be undertaken by a competent person and records maintained by the compliance manager and investment programme co-ordinator in the case of asbestos removals.
- **Label:** Some of the known asbestos will be labelled, and/or fixed with an appropriate warning sign. Not all known ACMs within our premises are labelled, but they are all recorded on the asbestos register. The register must always be checked prior to work being instructed.
- **Protection/enclosure:** Some of the ACMs in our premises may be protected by a physical barrier, such as timber casing. The casing is sealed and made as airtight as possible to prevent the migration of fibres.
- **Sealed/encapsulate:** There are two methods of encapsulation, which involves applying a durable layer adhered to the surface of the ACM, such as PVA or wallpaper paste.
- **Repair:** Repair will only be undertaken if the damage is slight. There are a number of methods including filling, wrapping and isolated encapsulation. All repairs will be carried out using non-asbestos materials.
- **Remove:** The HSE advises against removal of asbestos since if removal is undertaken without due consideration there is a potential to increase the risk of harm. ACMs will be removed where they are found to be in poor condition and repair; where it is not possible to undertake maintenance works without disturbing the material; when refurbishment works are due to be undertaken or where the formal risk assessment advises such a course of action.

We have adopted the following hierarchy of control for ACMs within a property:

- Areas of highest risk that cannot have access restricted or be isolated shall receive the earliest attention and strictest management.
- Areas of high risk that can have access restricted or be isolated have been identified as such, and access to these areas has been restricted and a permit to work system put in place.
- Where ACMs are damaged, deteriorating or inadequately sealed they will be either removed, or repaired or encapsulated, whichever is the most practical way to prevent the release of asbestos fibres, and manage these materials. This will be documented within the plan.
- Where ACMs are in good condition and not subject to abrasion or disturbance, then they will be left undisturbed and their condition inspected.

The asbestos register will be reviewed and regularly updated, and a system of asbestos re-inspections implemented for the non-domestic common areas on a regular basis, depending upon the nature, type and condition of the ACMs and as determined by the risk assessment.

A system of asbestos re-inspection surveys will be implemented for domestic premises on a planned program basis. A program of 200 properties per annum will be reviewed.

Any works affecting ACMs are to be carried out using procedures which safeguard contractors, colleagues, and the public. The relevant regulations and guidance documents are to be followed when dealing with these materials.

9. Asbestos Surveys

Management surveys

Our asbestos policy states that:

- We will ensure that all existing and newly acquired blocks with communal areas which were built before 2000 are subject to asbestos management surveys in line with The Control of Asbestos Regulations 2012.
- We will seek to ensure that all existing and newly acquired domestic properties which were built before 2000 are subject to asbestos management surveys to protect employees and contractors in line with our statutory duties under the Health & Safety at Work etc Act 1974.

All non-domestic stock (including the common parts of all blocks and sheltered schemes) that falls under the Duty to Manage requirements of CAR 2012 Regulation 4 will be re-inspected on an annual basis.

All textured coatings present within our premises will be presumed to contain asbestos. This decision has been made due to the majority of housing stock being built between 1950-1980. When planned works affect textured coatings these will be sampled for the analysis of asbestos. No work will be undertaken that involves disturbing textured coating by anyone who is not suitably trained to do so.

Where not already surveyed, all premises coming void will have an asbestos management survey completed and should there be any refurbishment works required within the void then a refurbishment and demolition survey will be completed prior to any works being undertaken in the premises.

Any future asbestos management surveys carried out to our properties will be in accordance with HSG264 asbestos. The survey guide can be accessed via this link:
<http://www.hse.gov.uk/pubns/books/hsg264.htm>

Refurbishment/demolition surveys

Refurbishment/demolition surveys require intrusive inspections to determine the location of any ACMs that may be affected by the work before any work starts. This will include but not be limited to major construction and engineering work, refurbishments and alterations, rewiring and cabling works, window replacement, flat roofing and demolition.

In advance of the major works programme all properties that we own will have an asbestos refurbishment survey of the areas subject to the works and a management survey for the remainder.

All properties where major aids and adaptations work is to be carried out will have a refurbishment and development asbestos survey.

All asbestos surveys required for repairs works will be whole house surveys.

Any future asbestos refurbishment and demolition surveys carried out to our premises will be in accordance with HSG264 Asbestos.

10. Asbestos Register and Building Plans

The principal requirements for the asbestos register are:

- Keep and maintain an up to date record of the location, condition, maintenance and removal of all ACMs.
- Assist in the provision of information to anyone who has the potential to disturb ACMs about the location and condition of the material.

For all premises we own, a centrally held and maintained asbestos register of all ACMs discovered is maintained together with details of any action subsequently taken. The live register (The asset management system) is updated as new information is received. This includes the following:

- Condition inspections.
- Deletions to the register when asbestos is removed.
- Additions to the register when areas are surveyed, and asbestos is located.
- Changes to the register information (at any time asbestos containing materials are found to have deteriorated).
- Records of air tests, certificates of reoccupation etc.

Note: It will not include details of all ACMs that are likely to be present in all of our premises.

This information is electronically stored on the Vision portal. All users are provided with unique log in details and access rights.

Information relating to ACMs will be available to all colleagues and contractors via Vision. The asbestos register must be consulted in advance of any maintenance work that will disturb the fabric of the building and which could disturb ACMs.

Plans from the asbestos survey will be used to assist in the location of materials found.

Re-inspections

ACMs should be inspected regularly depending upon the material type, location, condition and the risk assessment score to check for damage or deterioration as this may alter the original risk assessment.

The re-inspection period for all non-domestic areas where ACMs are identified will be determined by the asbestos management survey and subsequent risk assessment and score but will not exceed 1 year.

The asbestos responsible person must ensure the condition of ACMs is monitored and the inspections and re-inspections are carried out within the required timescales. Re-inspections will be by the asbestos responsible person, a competent person or approved contractor.

Damage to any materials that could possibly contain asbestos must be reported to the compliance manager so that a suitable inspection and assessment can be made to determine the appropriate actions necessary. This includes arising from alterations to a property which have been made by a resident with or without our agreement.

Any area where damage has been discovered must be vacated and secured until it can be made safe.

Any inspections should be documented as follows:

- **Date of inspection:** this section needs completing for the month and year the visual inspection is to be carried out.
- **Reference relating to the inspection point:** reference to the inspection point where ACMs or presumed ACMs have been identified. The visual inspection is to ensure the control measure remains in place with no sign of damage, deterioration, vandalism, tear, breakage, or collapse. It is a visual inspection with no contact to be made with the structure, equipment, item that remains as the management control measure.
- **Description of the location:** this informs the competent person completing the monitoring sheet / inspection the location they are checking. It also gives a depiction of the location which has been taken directly from the building plans from the asbestos register.
- **Details of what needs to be inspected:** specific details on each element to check on the asbestos management control measure for each area of the building known or presumed to contain ACMs. Carefully read each assessment criteria and make a visual inspection of the management control measure in place to manage the asbestos.
- **Any additional comments or action taken if an assessment criterion failed:** refer to the asbestos emergency action plan procedures as to the action to take, communication to make and record keeping requirements to maintain a safe environment.
- **Who completed the inspection (print and sign):** colleague who has undertaken the visual inspections must clearly and legibly print their Housing Solutions and signs once they have completed the checks for that sheet.
- **Date of visual inspection:** it is essential that the date is recorded.

11. Sampling, Analysis and Clearance Procedures

Sampling, analysis and clearance must be carried out by competent UKAS accredited laboratories and must demonstrate compliance with the requirements of:

- Control of Asbestos Regulations 2012, in particular regs. 19, 20, 21.
- HSG 248 Asbestos: The Analyst's Guide for Sampling, Analysis and Clearance Procedures.

For licensable works, the results from the certificate of reoccupation are taken to determine whether an area is suitable for reoccupation and must be as specified in the current HSE guidance HSG248.

For non-licensable work, a representative proportion of the work undertaken should be subject to air monitoring to give assurance that the removal work is completed to a suitable and safe standard.

12. Risk Assessments and Action Plan

A legal requirement to carry out a risk assessment for all work activities exists under the Management of Health and Safety at Work Regulations 1999. The requirement to assess the risk posed by asbestos is further enforced by the Control of Asbestos Regulations 2012. These regulations require that asbestos present in the workplace, must not present a hazard to health.

The risks from asbestos should be assessed and managed for all identified or presumed ACMs. The risk assessment or priority rating will establish the likelihood of people being exposed to the hazard and identify the measures to be taken that will either eliminate the hazard or adequately control it.

A risk assessment priority algorithm is calculated from the adding the material score obtained during the survey to the average scores for each of the four human exposure factors (priority assessment algorithm) given by the table in Appendix A. This table has been extracted from the HSE guidance document HSG 227 - A Comprehensive Guide to Managing Asbestos in Premises.

The written plan shall specify any repair work or removal that needs to be carried out on the ACMs identified, and provide the order of priority for ensuring this is implemented. Areas of high risk shall receive the earliest attention and strictest management controls.

A copy of the asbestos management survey will be provided to the resident on commencement of the tenancy, or upon request via email to asbestos@housingsolutions.co.uk

13. Labelling of Identified and Presumed Asbestos

The protocol to be adopted for the labelling of identified and/or presumed ACMs/area is as follows:

- Communal areas, e.g. plant rooms, service risers – an appropriate asbestos warning label should be attached to asbestos containing products.
- Public areas – Maintain an up to date asbestos register and marked up floor plans.

11.1 The absence of a label indicating asbestos is present is not conclusive proof that none exists, and if there is any doubt about the type of material, no work should commence until there is proof/evidence that the material is asbestos free.

11.1 The format for labelling is in Appendix B.

14. Actions to Prevent Exposure

We will carry out the following actions:

- Provide adequate resources for the management of ACMs within the premises.
- Communicate with residents, colleagues, contractors and others on the location and condition of ACMs within the premises.
- Provide adequate training to colleagues who require greater awareness of the effects and uses of asbestos.
- Implement a management regime to ensure that all ACMs are maintained in good, sealed condition, or where this is not possible access is restricted via permit to work entry, or the materials are removed.
- Review the asbestos management plan regularly to take account of changes to legislation or current practice.
- Re-inspect ACMs within non domestic common areas annually to monitor any change in their condition and record the results of these inspections.
- Prior to any work being carried out which penetrates the fabric of the building, a refurbishment and demolition survey as described by HSG 264 will be carried out to determine if any hidden asbestos containing materials are present.
- All surveys will be carried out by our approved consultant who are accredited by UKAS as meeting the requirements of ISO 17020, and ISO 17025, and in accordance with HSE guidance document HSG 264.

Instructions on restrictions to any areas containing asbestos or presumed to contain asbestos will be given following the risk assessment to those likely to come into contact with the materials.

15. Work Affecting Asbestos

Use of asbestos

No products containing asbestos are to be used for any future work. This is a legal requirement.

Before commencing work

All work affecting ACMs needs to be carefully planned to avoid the release of asbestos fibre or where this is not possible to reduce any exposure to as low a level as is reasonably practicable.

NB No work affecting ACMs in Housing Solutions premises is to be undertaken until Housing Solutions have been informed and the planned actions approved.

Construction (Design and Management) Regulations 2015

CDM 2015 requires arrangements to be in place to deal with asbestos during construction work, including refurbishment and demolition. Where construction or building work is to be carried out, the CDM client (normally Housing Solutions) must provide designers and contractors who are bidding for the work (or who they intend to appoint) with project-specific information about the presence of asbestos i.e. an asbestos survey, so that the risks associated with design and construction work, including demolition, can be addressed.

Emergency and urgent works

As checks and surveys will not normally be possible before this type of work is undertaken it is important that:

- Contractors carrying out emergency and urgent property works at Housing Solutions premises are made aware that ACMs have been used in the construction and insulation of its premises and of the procedures necessary should such materials be discovered
- Contractors have provided the necessary training and information so that their operatives undertaking the work are aware of the type of ACMs that may be discovered in county premises and of the reporting procedures should any be discovered. Evidence of the asbestos awareness training given to their operatives must be provided by the contractor
- Details of any suspect materials discovered during such work must be reported to Housing Solutions using the reporting tool for recording and onward transmission to the nominated competent persons.

Planned work to existing premises

Prior to commencement of any planned work in existing premises checks must be made of existing drawings, records and the asbestos register. The procedure outlined in Appendix C should be followed at all times.

Depending on the nature of the work surveys should be carried out as follows:

- Non-intrusive works: - Minimum of a management asbestos survey as a normal duty (checks should be made as to whether this level of survey has already been carried out). Materials included on the register that have been 'presumed asbestos' will need to be analysed. This includes all textured coatings within property which are likely to be affected by the planned works.
- Intrusive works (including rewiring and cabling) - A demolition and refurbishment asbestos survey. The cost of this survey must be included within the overall cost of the project.

Details of any suspect materials discovered during the surveys must be reported to the nominated competent persons. To ensure that contractors carrying out planned work in our premises are made aware of the possible presence of ACMs the following clauses are to be included in all specifications (or where applicable the health and safety plan) for work in existing premises where asbestos has not been discovered during the initial surveys but may be encountered during the work:

“Attention is drawn to the fact that in the past Housing Solutions has used asbestos products in the construction and insulation of its premises. Whenever possible these materials will be identified to the contractor together with the minimum safety requirements necessary for work affecting such materials. The contractor must carry out his own inspections to identify such materials.

Initial inspections, however, may not reveal all ACMs present so it is important that during the course of the works the contractor is vigilant and if any previously unknown asbestos is discovered work in the area stops immediately and the Housing Solutions project leader and manager responsible for the property are informed so that the correct action can be taken.”

Where the work involves boiler changes the tender documents must include a specification to cover work affecting asbestos rope seals, asbestos gaskets etc. The contractor must then submit with the tender a method statement for dealing with any identified asbestos or any asbestos that may be discovered during the work alongside evidence that they are suitably trained and insured to undertake the task.

16. Competency Of People and Organisations Undertaking Asbestos-Related Work

Asbestos-related work is undertaken in our properties by our in-house workforce and approved contractors. The latter may be appointed directly to undertake work, or they may be subcontracted to undertake work on behalf of our in-house workforce.

Work undertaken by our in-house workforce is undertaken by trained colleagues due to the possibility of ACMs being present.

Work undertaken by specialist contractors includes asbestos surveys, removal and disposal.

All contractors will be appointed by the ‘duty holder’. As part of the appointment process an assessment of competency will be carried out where the contractor and its workforce will be required to demonstrate that they are suitably qualified to undertake the work.

Evidence will be obtained to confirm the competence of all contractors and its workforce on an annual basis.

All work with asbestos must be carried out by competent people and must demonstrate compliance with the requirements of:

- Control of Asbestos Regulations 2012
- Approved code of Practice L143 Managing and Working with Asbestos
- HSG 247 Asbestos: The Licensed Contractors’ Guide (licensed work only)

Under the CAR 2012, people who undertake any work with asbestos must be competent and suitably qualified to do so. For the removal of certain asbestos containing materials a valid HSE asbestos licence is required. This licence will have been approved by the Asbestos Licensing Unit which has been delegated by HSE to grant and review licences for asbestos work as set out in the CAR 2012. This includes work with asbestos unless it is exempt from regulation 8 of the regulations. This work is carried out on our behalf by

specialist contractors.

Subject to regulation 9, the contractor shall not undertake any work with asbestos unless he has notified the HSE in writing at least 14 days before commencing that work. For urgent or emergency work it may be possible to negotiate a reduction in this period.

Regular minute meetings will take place with any contractor which undertakes asbestos-related work on our behalf in order to monitor performance, quality and progress.

17. Asbestos Waste

Asbestos waste comes under the requirements of the Hazardous Waste Regulations 2005 and Carriage of Dangerous Goods (etc) Regulations 2004. Asbestos waste also includes contaminated building materials, tools that cannot be decontaminated, personal protective equipment and damp rags used for cleaning.

Under the Hazardous Waste Regulations 2005, it is an offence to produce hazardous waste at premises, or remove that waste from premises, unless those premises are registered with the Environment Agency and provided with a unique premises number called a 'premises code'. This is valid for **12 months** from the date of registration. If hazardous waste continues to be produced or removed from these premises after expiry, then the premises code must be renewed. Premises codes can be renewed up to **one month** in advance of the expiry date.

All asbestos waste must be transported by a registered waste carrier for safe disposal at a licensed disposal site and evidence provided by way of a 'waste consignment note' which must be retained for three years. Housing Solutions uses a registered waste carrier to ensure safe disposal of waste, including asbestos, across its stock.

ACMs or equipment containing asbestos cannot be sold or given to other parties. It must be removed and disposed of as 'hazardous' waste.

Further information on the requirements for dealing with asbestos waste can be found on the Environment Agency and HSE websites:

<https://www.gov.uk/government/organisations/environment-agency>
<https://www.hse.gov.uk/pubns/guidance/em9.pdf>

18. Management Principles

There is no statutory requirement to remove ACMs of any type. The discovery and identification of such materials will not automatically lead to their removal. There is however a statutory duty to manage ACMs in our premises and ensure that:

- ACMs left in-situ are maintained in a safe condition so as to prevent asbestos fibres being released into the atmosphere
- any work on or affecting ACMs is carried out in accordance with current legislation.

Achieving this requires careful consideration in all cases and the decision must be based on the avoidance of risk and not on the cost. This is achieved by ensuring that the following:

- Competent persons are appointed to advise us on asbestos issues.
- Materials containing asbestos fibre are not used for any work in our premises.

- All textured coatings within our premises are presumed to be asbestos until tested when planned works are required which will affect them.
- Asbestos management surveys will be carried out on new property acquisitions where they are constructed pre 2000's.
- Residents are made aware of the presence of known ACMs within their properties A copy of the asbestos management survey will be provided to the resident on commencement of the tenancy, or upon request via email to asbestos@housingsolutions.co.uk
- ACMs which are vulnerable to damage are removed or protected.
- ACMs left in-situ are maintained in a safe condition.
- Procedures are introduced for reporting the discovery of previously unknown ACMs and of damage to known ACMs.
- Details of all ACMs discovered by survey or report are recorded in the Asbestos Register held centrally.
- Checks are made of existing records and where necessary 'asbestos refurbishment/demolition surveys' are undertaken before any planned work starts.
- An asbestos register is maintained and updated after known works carried out by us or our contractors.
- All contractors who undertake emergency or urgent works to our premises are made aware that the premises may contain asbestos and that their operatives have all received asbestos awareness training.
- Any work affecting ACMs is carried out strictly in accordance with current legislation, our asbestos policy and management plan.
- All policies and procedures, and this management plan, are regularly reviewed.

19. Contractors Completing Tasks

This procedure applies to any contractor undertaking any tasks in any of our premises or on our estates, (including maintenance, servicing, inspections, surveys, building work, mechanical, electrical, water systems, structural, decorative etc.).

It is a requirement that all contractors undertaking any work will have received the appropriate level of asbestos training as defined by regulation 10 of CAR 2012 and the ACoP L143.

All external contractors employed by us will be required to demonstrate that their employee has received general asbestos awareness training. All external building and service contractors and consultants will be advised that we have an asbestos register that should be consulted. These contractors and consultants will also be advised of our asbestos policy, which they are expected to read and to which they should adhere.

All colleagues initiating modifications to building structures and services must consult the asbestos register about the presence of asbestos within any parts of the building concerned and where necessary request an appropriate asbestos survey.

Where a report is necessary a copy of the asbestos survey report will be provided, with recommendations for any remedial action that should be incorporated into the project. This, together with the survey report, should be made available to the project team

concerned with the overall design of the refurbishment programmed.

For major works, regeneration and demolition, the report will form an integral part of their risk assessment arrangements for compliance with the Construction (Design and Management) Regulations 2015. This must be addressed at project inception as failure to do so could cause substantial delays in commencement. If there is any doubt the asbestos responsible person will ensure you view the asbestos management procedures and that you understand the content.

If suspect material is discovered during the course of the project, the contractor shall review the risk and take appropriate management action.

On completion of any remedial works the contractor will provide a completion document which should be retained with the project health and safety file.

Contractors are required to undertake their duties in a safe and responsible manor, with due consideration to work colleagues, other contractors, colleagues, visitors and residents. It is essential to report to the asbestos responsible person immediately if any of the following situations occur:

- A contractor disturbs a material that is known to contain asbestos
- A contractor disturbs a material that is suspected of containing asbestos
- A contractor comes across a material that they suspect could contain asbestos
- Any damage or movement of equipment or materials that could result in the exposure to asbestos or potential of releasing asbestos fibres.

NB If anyone is in doubt or unsure of any of the information presented, they must inform the compliance manager or the asbestos responsible person. We want to ensure that anyone attending at one of our premises to undertake duties/tasks are fully aware of any ACMs present. We will not permit any work to commence until the person(s) undertaking the work fully understands this asbestos management plan.

20. Resident Profile and Provision of Information

We will promote resident awareness of asbestos safety and the risks arising from asbestos on our website and through other channels such as leaflets and resident newsletters.

When a resident becomes the lawful occupier of one of our properties which was built before 2000, we will ensure they are provided with asbestos safety information relevant to their home. This will include all of the following:

- General information about asbestos safety in the home.
- Specific information about ACMs contained in their home ('domestic advisory letter').
- Details about what to do in the event of an asbestos safety incident, including, where relevant, the process for alerting us about the incident.
- Details of their responsibilities in relation to asbestos safety, including, where required, any obligations that are contained in the occupancy agreement we have with them to seek our agreement prior to making any changes to their home.

This will apply to all residents, including residents, licensees, leaseholders and shared owners. It also applies whether they have moved into one of our vacant homes, succeeded

to a tenancy or through assignment (including a mutual exchange). It does not apply to people who do not have a contractual relationship with us, such as residents of leaseholders.

When a resident becomes the lawful occupier of one of our properties for which an asbestos risk assessment is required, we will obtain information about the composition of their household. This is to enable us to identify any residents whose profile (for example, they are frail or vulnerable due to their age or a serious long term illness) and the property in which they live may mean that alternative asbestos management arrangements should apply.

We will encourage residents to inform us of any changes in the composition or needs of their household.

On request, we will supply residents with a copy of the asbestos management survey which is relevant to the property in which they live.

21. Asset management and new properties

From time to time we change the use or dispose of one of our existing properties. We also acquire properties, which can be newly built or an existing property from a third party.

Change of use of an existing property

Where a change of use of an existing property which was built before 2000 is planned a new asbestos risk assessment must be carried out to identify, evaluate, remediate and manage the risks arising from asbestos in the property based on the new use of the property.

The results of the new asbestos risk assessment must be recorded in Vision along with remedial actions.

All remedial action, except where this is categorised as very low risk or low risk, must have been completed before the property can be used for its new purpose. All actions will have specific 'action by' dates and will be monitored by KPIs.

The new occupants of the property must be provided with asbestos safety information relevant to the property, including precautions and what to do in the event of an incident.

Disposal of an existing property

In these situations, disposal means that the legal ownership of the property is transferred from us to a third party through its sale, by being gifted or leased.

Where an existing property which was built before 2000 is to be disposed of to a third party on a freehold basis, we will provide information about asbestos within the property upon request. Once the disposal has been completed, we will no longer have any responsibility for asbestos safety within the property, unless the terms of any legal agreements specify otherwise.

Where an existing property which was built before 2000 is to be disposed of to a third party on a leasehold basis, information about our asbestos safety responsibilities and those of the leaseholder will be agreed as part of the disposal process and set out in the lease.

Prior to disposal, due to the property's change in use (for example it may be empty for a period of time, boarded up and services decommissioned), a risk assessment must be carried out to ensure that any fire safety (and other) compliance checks are undertaken periodically (frequency depending on the duration it is empty) and prior to the disposal being completed.

Acquisition of an existing property

Where we are acquiring an existing property from a third party which was built before 2000 and we will become responsible for asbestos safety and management within the property, we will obtain asbestos records from the third party and undertake an asbestos management survey following acquisition. If required, a refurbishment and demolition survey will be undertaken if the property is due to be upgraded, refurbished or demolished.

The purpose of the survey is to identify, evaluate, remediate and manage all the asbestos safety hazards in the property based on its intended use. This will determine whether any existing asbestos safety and protection measures are effective, suitable and sufficient. It will also help us to determine whether we will require and/or obtain any warranties, guarantees or similar from the third party following completion of the transaction.

Where we are acquiring an existing property from a third party and we are not the freeholder (for example, because we are acquiring leasehold flats or there is a managing agent), we will ensure that we understand who is responsible for asbestos safety within the property and any responsibilities that we have.

The results of the new asbestos management survey and reviews of legal agreements relating to asbestos safety, are recorded in The asset management system (asset management system). Remedial actions will be recorded in and managed through Vision.

All remedial action, except where this is categorised as very low risk or low risk, must have been completed before the property can be used for its new purpose. All actions will have specific 'action by' dates and will be monitored by KPIs.

The occupants of the property must be provided with asbestos safety information relevant to the property, including precautions and what to do in the event of an asbestos safety incident.

Development or acquisition of a newly built property

Where we are developing or acquiring a newly built property from a third party, and we will become responsible for asbestos safety within the property arising from the former use of the site, then responsibility for identifying asbestos and minimising any risks arising from asbestos will be set out in the build contracts. The contract will also confirm details of any warranties, guarantees or similar from the third party.

Our role is to appoint competent consultants and contractors to oversee the design and construction process and, based on the advice of consultants and contractors (where appropriate), to decide whether to accept the property and associated systems at practical completion. It is also our responsibility to ensure that monitoring and inspection arrangements are in place.

Where required, and prior to acquisition, an asbestos management survey and risk

assessment will be carried out to identify, evaluate, remediate, and manage all the asbestos safety hazards in the property based on its intended use.

The results of the new asbestos management survey and risk assessment will be recorded in The asset management system (asset management system). Remedial actions will be recorded in and managed through vision.

All remedial action, except where this is categorised as very low risk or low risk, must have been completed before the property can be used for its new purpose. All actions will have specific 'action by' dates and will be monitored by KPIs.

The new occupants of the property must be provided with asbestos safety information relevant to the property, including precautions and what to do in the event of an asbestos safety incident.

22. Emergency situations and incidents

Details of our approach to identifying and responding to any unplanned event, potential emergency or disaster, including asbestos safety incidents, is explained in our major incident plan and incident management guidance.

Emergency response

Specifically, in relation to an asbestos incident, the diagram in Appendix D summarises how we will respond:

In the event of damage to ACMs or suspected ACMs, or the accidental release of known asbestos fibres into the air, the following emergency procedures should be instigated immediately:

- Immediately clear the area of all persons - without causing undue alarm.
- Remove any contaminated clothing and leave in area.
- Isolate area if possible - (e.g. if in a single room).
- Prohibit access to area and secure the area (cordon off, erect signage etc).
- Turn off any ventilation systems in the area e.g. air conditioning units, extractors etc. unless to do so, re-entering the area would be necessary).
- Inform the Compliance Manager or Head of Fire and Compliance or Health and Safety Manager as soon as it safe to do so. If the Compliance Manager or Head of Fire and Compliance or Health Safety Manager is unavailable, contact a suitable colleague as detailed within Section 4.

The Compliance Manager will then immediately assess the incident and collate the following information:

- Type of material disturbed.
- Location and amount of material.
- Details of how the damage occurred.
- Actions taken by who and when.

The Compliance Manager will then carry out the following tasks:

- Assess the situation and arrange for the affected area(s) to be evacuated and sealed using appropriate materials to minimise the spread of asbestos.

- Contact our approved contractor and/or HSE for specialist guidance / technical support.
- Initiate appropriate agreed steps to resolve the incident with asbestos removal contractor in attendance to deal with the affected area(s) and carry out remedial works as necessary.
- Compile a report on the conclusion of the incident.
- Update the management plan.

Communications with the HSE and other statutory bodies

Procedures are in place for deciding on whether we are required to notify the HSE or other statutory body.

All incidents of inadvertent (uncontrolled) exposure to known or suspected asbestos fibre must be reported to the HSE as a 'dangerous occurrence' in accordance with the procedures included in this plan and as required by under CAR 2012.

All incidents where there has been suspected or known inadvertent exposure to asbestos must also be recorded on the incident investigation report. In accordance with HSE advice this information will be retained by us for a period of 40 years.

Asbestos incidents and near misses

All asbestos incidents, including near misses, will be logged including details of any follow-up actions. This may include, but is not limited to the following:

- Making a claim with our insurers.
- Undertaking remedial work.
- Investigating the circumstances that led to the incident.
- Undertaking remedial action that is required to improve asbestos safety and management at the location of the incident and at other properties.
- Taking tenancy or lease enforcement action.
- Providing Advice to both residents and colleagues who may have been exposed.
- Communicating with residents to improve asbestos safety awareness.
- Working with the HSE or other statutory agencies.

We will review all incidents, including near misses, (particularly those where claims are made) to ensure that any lessons learnt are reflected in updates to policies, procedures and working practices in order to reduce the number of incidents and near misses and to mitigate our liability.

At the earliest opportunity (and before reporting an incident to the HSE) details of the incident or near miss will be reported to the 'duty holder' and the chief executive.

An investigation into the activity that led to the possible inadvertent exposure will be carried out by the Head of Fire and Compliance / Compliance Manager / Health and Safety Manager.

The Head of Fire and Compliance or Compliance Manager and Health and Safety Manager are responsible for reporting asbestos incidents to the HSE as required and for managing contact with the HSE and other statutory bodies.

23. Audits, Inspections, Enforcement, or Improvement Action Taken by Statutory Bodies

We will work closely with the HSE, fire service, local authorities, and other statutory bodies to obtain their advice and assistance in relation to asbestos safety and management in our properties. This can include audits and inspections of our properties and promoting asbestos safety awareness amongst our residents.

We will provide information about the presence of asbestos within our properties upon request from a statutory body.

We will respond promptly and positively to any enforcement or improvement action that is taken by a statutory body. Our response will include the following:

- We will review the conclusions of the statutory body and engage with them if we have reason to challenge or seek clarification of their conclusions and/or requirements.
- We will ensure that requirements are addressed within the specified or agreed timescale.
- We will identify if there are similar issues within our other properties. If so, we will take appropriate remedial action.
- Full details will be recorded on an incident form and reported to the 'duty holder', chief executive and the members of the health and safety panel.

Audit

The Asbestos Management procedures will be audited as per the following table:

Audit Type	Frequency	Responsible Person
Property check*	Quarterly	Compliance Manager
External audit carried out by external auditors	Bi-annually	Director of and Property Development

*To ensure that all properties that require an asbestos survey are recorded on the master database with a date for re-inspection.

- The Director of Property and Development must record the findings of an audit.
- All persons are to ensure that proper records are maintained and available on demand for inspection by internal auditors.
- These records shall include but not be limited to the following:
 - Documentary evidence that the Asbestos Policy has been implemented and complied with
 - Details of the qualifications of the named competent persons
 - Details and location of the asbestos register
 - Evidence that all contractors have been provided with details of the register
 - Evidence that demonstrates that all staff know who the competent person is and how they may be contacted;
 - Evidence that contractors are being checked onsite
 - Residents have received information that relates to asbestos discovered in their homes.

24. Training and Awareness

We will ensure that all relevant colleagues receive training in relation to asbestos safety and management. We will provide awareness training for majority of colleagues and specialist training for colleagues who are responsible for managing asbestos on a day to day basis.

Training records will be maintained in order to provide assurance about the competence of colleagues and to identify any gaps.

All asbestos safety and management training needs will be assessed annually, as a minimum.

Awareness Training

All new colleagues who may come into contact with asbestos through their role or may need to advise residents will attend an asbestos awareness course that covers basic asbestos management procedures. They will be expected to understand our asbestos policy.

Specialist Training

We will provide specialist training annually for colleagues who are responsible for managing asbestos safety on a day to day basis or whose work could impact upon asbestos management measures within our properties. This will be tailored to the role and will include the following colleagues:

- Colleagues who have specific roles set out in this management plan.
- Colleagues who organise, specify, monitor or supervise repairs and maintenance in our properties, including residents' homes.
- Colleagues who undertake repairs, maintenance, surveying and inspection of asbestos in our properties and residents' homes, including independent living scheme managers.

The 'responsible person' and 'deputy responsible person' will be trained to BOHS P405 Management of Asbestos in Buildings qualification level. The asbestos responsible person will also be required to undertake P405 refresher training every 5 years.

Colleagues who are responsible for managing asbestos on a day to day basis will be receive UKATA certified asbestos awareness training and Category B (non-licensed) removal training where required. In addition, these colleagues are expected to maintain and update their own skills, information and knowledge relating to asbestos safety and management as part of their professional development.

25. Performance Management

We have established two types of performance metrics relating to asbestos management. These are:

- Key performance indicators (KPIs). These are the principal metrics by which we can understand our performance. KPIs and associated targets are set each year by the Board and the health and safety panel is responsible for ensuring their achievement.

In order to ensure that we have a clarity about our performance, all KPIs will be clearly defined and published annually. This includes:

- KPI – Target 100%. This is based on the number of re-inspections completed against the total number of re-inspections required, within non domestic common areas constructed pre 2000.

26. Record Keeping and Documentation

This section identifies all of the data and information that we hold in relation to asbestos, where it is stored and responsibility for ensuring that complete and accurate records are kept on a timely basis.

Colleagues who are responsible for data and information must ensure that the requirements of our data protection policy are met (where appropriate).

Record	Where held	Responsibility
Asbestos register and surveys		
Asbestos register	Vision Portal	Compliance Manager
Asbestos management survey records	Vision Portal	Compliance Manager
Asbestos refurbishment and demolition surveys	Vision Portal	Compliance Manager
Details of remedial actions	Vision Portal	Compliance Manager
Evidence of the competence of asbestos risk assessor company and assessors	Procurement Contractor File	Compliance Manager
Asbestos risk assessments		
Register of risk assessments for removals of asbestos	Vision Portal	Compliance Manager
Inspection records	Vision Portal	Compliance Manager
Details of remedial actions	Vision Portal	Compliance Manager
Undertaking work in communal areas, void properties and residents' homes		
Risk assessments relating to repairs and maintenance	Company Intranet	Health and Safety Manager
Resident profile		
Details of at-risk residents	Open Housing	Assistant Director of Housing and Resident Engagement
Audits, inspections, enforcement or improvement action taken by statutory bodies		
Records of audits and inspections including any supporting documentation	Company Shared Drive N:\Operations\Asset Management\Asset Health and Safety	Health and Safety Manager
Records of enforcement action or similar undertaken by statutory bodies including any supporting documentation	Company Shared Drive N:\Operations\Asset Management\Asset Health and Safety	Health and Safety Manager
Training and awareness		

Record	Where held	Responsibility
Training needs assessments	Training Matrix	Assistant Director of People Services
Training records for all colleagues	Colleagues Training Records	Assistant Director of People Services
Performance management		
Details of key performance indicators (KPIs)	Monthly Compliance Report	Compliance Manager

27. Monitoring and Review

The application of this management plan will be monitored through reporting to:

- all senior managers
- the health and safety panel
- the executive board
- the audit and risk committee
- the board.

This management plan will be reviewed every year or sooner if legislation or regulations change.

28. Other related reading

The following documents support the context and the application of this policy:

- Asbestos Policy
- Health & Safety Policy
- The Regulator of Social Housing's Home Standard

29. Further information

Please contact Nick Williams, (Compliance Manager) or Thomas Basset (Health and Safety Manager) if you have any query about the status of this plan.

Material Assessment Scoring

Section	Sample variable	Score	Examples of Score
A	Product type (or debris from product).	1	Asbestos reinforced composites (plastics, resins, mastics, roofing felts, vinyl floor tiles, semi rigid paint or decorative finishes, asbestos cement, etc).
		2	Asbestos insulating board, mill boards, other low-density insulation boards, asbestos textiles, gaskets, ropes and woven textiles, asbestos paper and felt.
		3	Thermal insulation (e.g.: pipe and boiler lagging), sprayed asbestos, loose asbestos, asbestos mattresses and packing.
B	Extent of damage/ deterioration.	0	Good condition: no visible damage.
		1	Low damage: a few scratches or surface marks; broken edges on boards, tiles, etc.
		2	Medium damage: significant breakage of materials or several small areas where material has been damaged revealing loose asbestos fibres.
		3	High damage or delamination of materials, sprays and thermal insulation. Visible asbestos debris.
C	Surface Treatment	0	Composite materials containing asbestos: reinforced plastics, resins, vinyl tiles.
		1	Enclosed sprays and lagging, AIB (with exposed face painted or encapsulated), unsealed cement sheets, etc.
		2	Unsealed AIB, or encapsulated lagging and sprays.
		3	Unsealed lagging and sprays.
D	Asbestos type	1	Chrysotile.
		2	Amphibole asbestos excluding Crocidolite.
		3	Crocidolite.
Material Assessment Score = A + B + C + D			

Section	Factor	Score	Examples of Score
Normal Occupant Activity Score = E			
E	Main Type of Activity	0	Rare Disturbance activity (e.g. Storeroom)
		1	Low Disturbance Activity (e.g. Office)
		2	Periodic Disturbance (May contact ACMs)
		3	High Level of disturbance (e.g. panel on door)
Likelihood of Disturbance Score = Average of F + G + H			
F	Location	0	Outdoors
		1	Large Rooms or well-ventilated Areas
		2	Rooms up to 100sqm

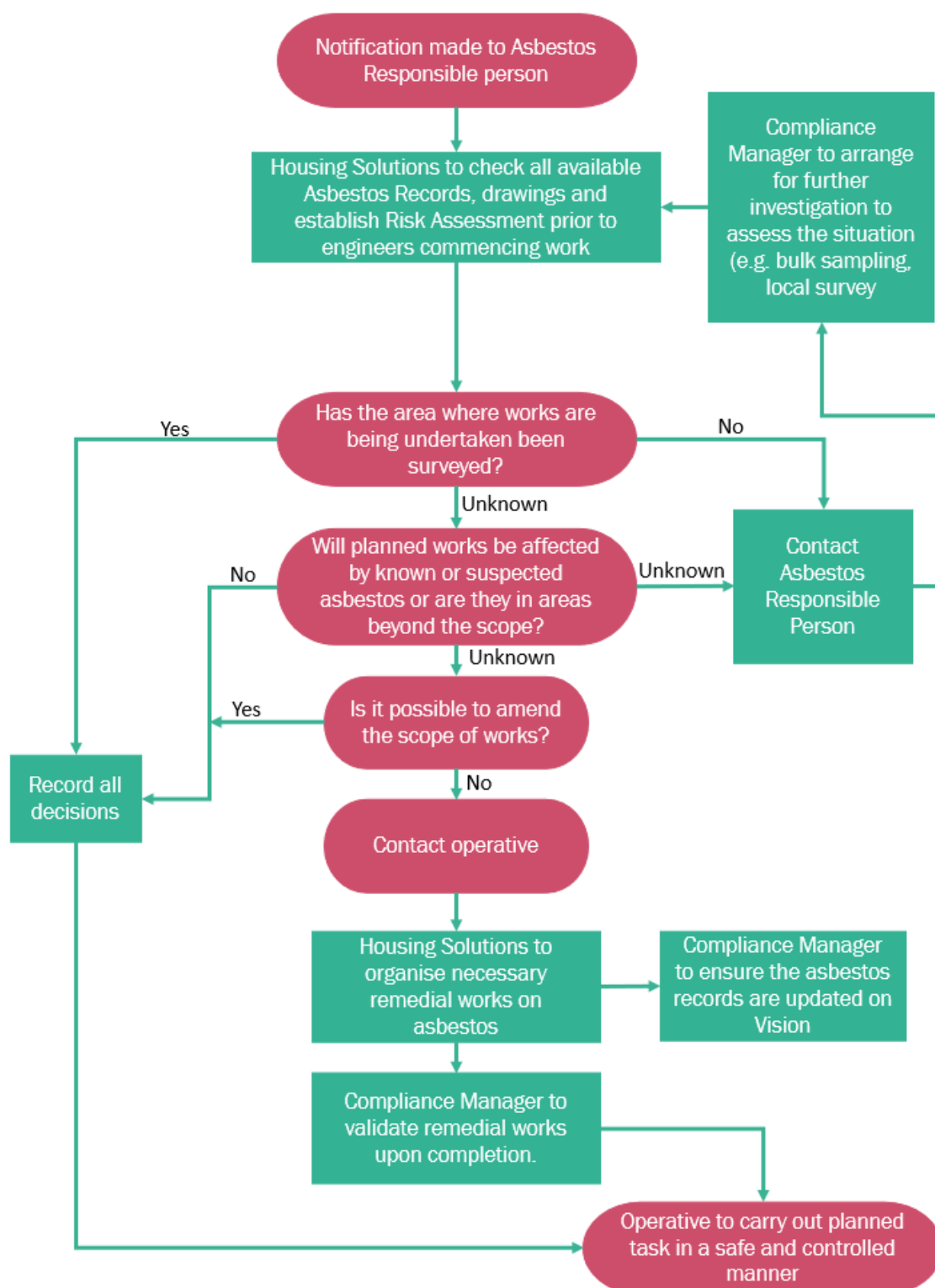
		3	Confined Spaces
G	Accessibility	0	Usually Inaccessible or unlikely to be disturbed
		1	Occasional Disturbance
		2	Easily Disturbed
		3	Routinely Disturbed
H	Extent	0	Very Small Amounts
		1	<10sqm or <10lm
		2	>10sqm to <50sqm or >10lm to <50lm
		3	<50sqm or >50lm
Human Exposure Potential Score = Average of I + J + K			
I	No of Occupants	0	None
		1	1-3
		2	4-10
		3	>10
J	Frequency of Use	0	Infrequent
		1	Monthly
		2	Weekly
		3	Daily
K	Average Time in Use	0	<1 Hour
		1	>1 hour and <3 hours
		2	>3 hours to <6 hours
		3	>6 Hours
Maintenance Activity Score = Average of L + M			
L	Type of Activity	0	Minor disturbance e.g. possible contact
		1	Low disturbance e.g. removing light bulb
		2	Medium Disturbance
		3	High levels of disturbance
M	Frequency of Maintenance	0	ACM unlikely to be disturbed
		1	1 per Year
		2	>1 per year
		3	>1 per Month

Labelling

Larger labels 100mm



Procedure for planned works



Asbestos Scenarios

Scenario 1

An operative attends a premises owned/managed by Housing Solutions and the following occurs:

- The operative needs to access the soil stack behind a timber clad riser.
- The asbestos survey identifies that the area is clear of asbestos, however, the timber clad riser was listed as not accessed during the survey.
- The operative calls the supervisor and the work is allowed to commence
- Concern is raised by the operative following completion of the job and the asbestos waste is sampled by the organisation's specialist asbestos contractor
- The waste is confirmed to contain asbestos and is safely removed by the organisation's specialist contractor
- The organisation's specialist contractor cleans the work area, made the asbestos containing material safe and issued the relevant documentation

Before the Job Starts

If an operative:

- Identifies an area that could contain asbestos, but the area is not covered in the properties asbestos survey
- Has any concerns about the risk of asbestos exposure

Work must not commence

The relevant supervisor must be contacted to report the issue

The Supervisor must follow the asbestos policy and management plan and report the occurrence to the Head of Fire and Compliance or Compliance Manager or Health and Safety Manager if not available

If the Head of Fire and Compliance or Compliance Manager or Health and Safety Manager are not available a suitable colleague listed in the Asbestos Policy and Management Plan must be contacted

The asbestos policy and Management Plan must be implemented, the area tested, or an asbestos survey carried out

If Work Has Started

If the work has already been started and there is a potential exposure of asbestos the asbestos policy and management plan must be followed and:

Work must stop immediately

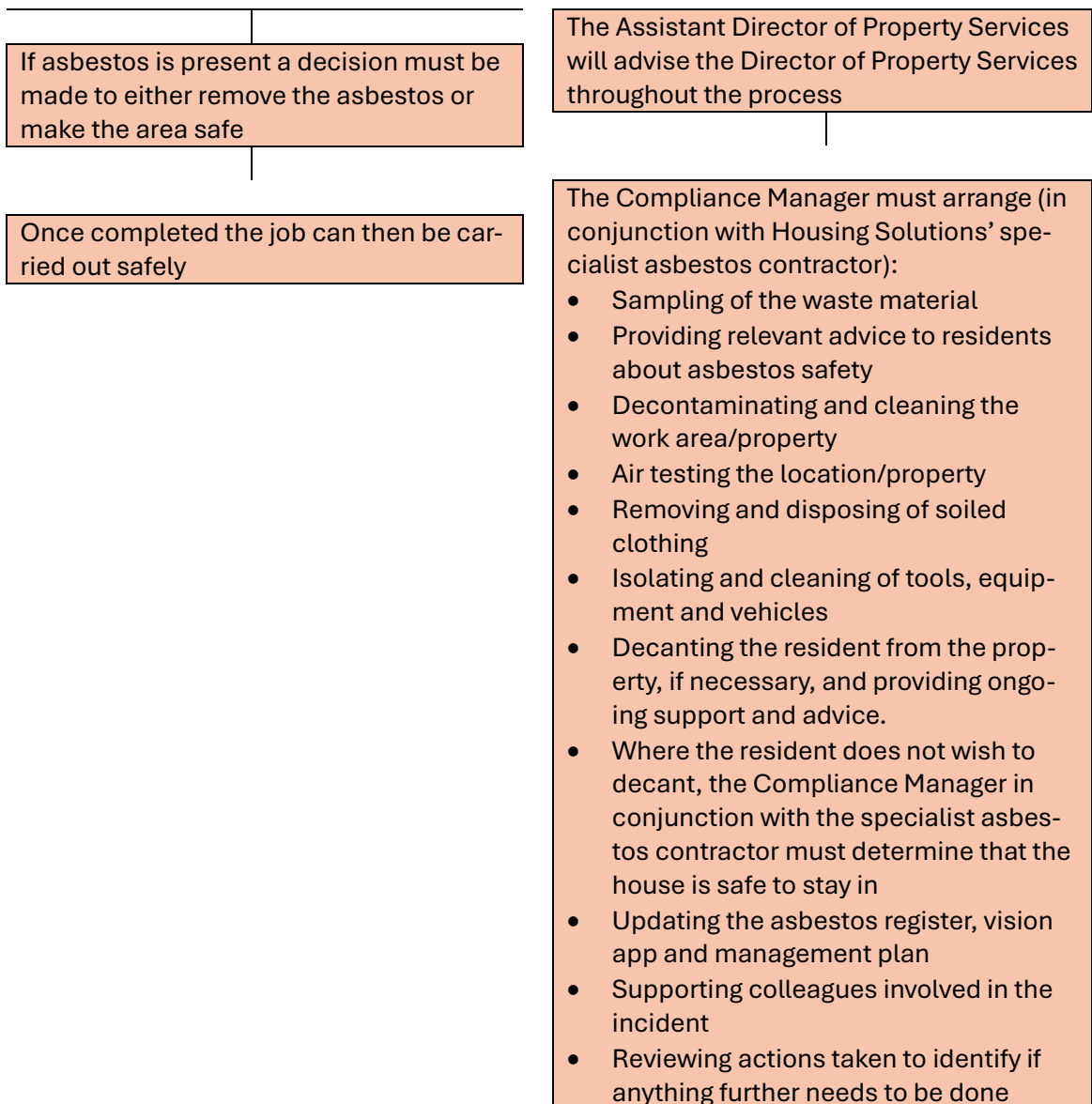
Operatives and residents must leave the work area immediately

The work area must be secured and made safe

The relevant supervisor must be contacted to report the issue and an Accident/Incident Reporting and Investigation Form completed

The supervisor must advise the Compliance Manager. If the Compliance Manager is not available a suitable colleague listed in the Asbestos Policy and Management Plan must be contacted

The Assistant Director of Property and the Health and Safety Manager must decide whether a formal health and safety investigation should take place



Scenario 2

An operative attends premises owned/managed by Housing Solutions and the following occurs:

- A leak takes place in the roof space of an immersion heater cupboard causing damage to the ceiling which has a textured coating applied to it
- The operative checks the asbestos survey on the Vision app and it appears that the area is clear
- The operative cuts a hole in the ceiling with a multi tool and then leaves the site
- Two other operatives visit the job to deal with the leak and they cannot access the asbestos survey on the Vision app
- While investigating the leak the textured coating ceiling falls down
- The operatives access the leak from the first-floor bedroom and fix the problem
- The two operatives wear face masks and PPE to double bag the waste and leave it for collection in the front garden
- The supervisor is contacted as the ceiling could be asbestos
- The Asbestos Policy and Management Plan is implemented

Before the Job Starts

If an operative:

- Identifies an area that could contain asbestos, but the area is not covered in the properties asbestos survey
- Cannot access the Vision App
- Has any concerns about the risk of asbestos exposure

Work must not commence

The relevant supervisor must be contacted to report the issue

The Supervisor must follow the asbestos policy and management plan and report the occurrence to the Head of Fire and Compliance or Compliance Manager or Health and Safety Manager if not available

If the Head of Fire and Compliance or Compliance Manager or Health and Safety Manager are not available a suitable colleague listed in the Asbestos Policy and Management Plan must be contacted

If Work Has Started

If the work has already been started and there is a potential exposure of asbestos the asbestos policy and management plan must be followed and:

Work must stop immediately

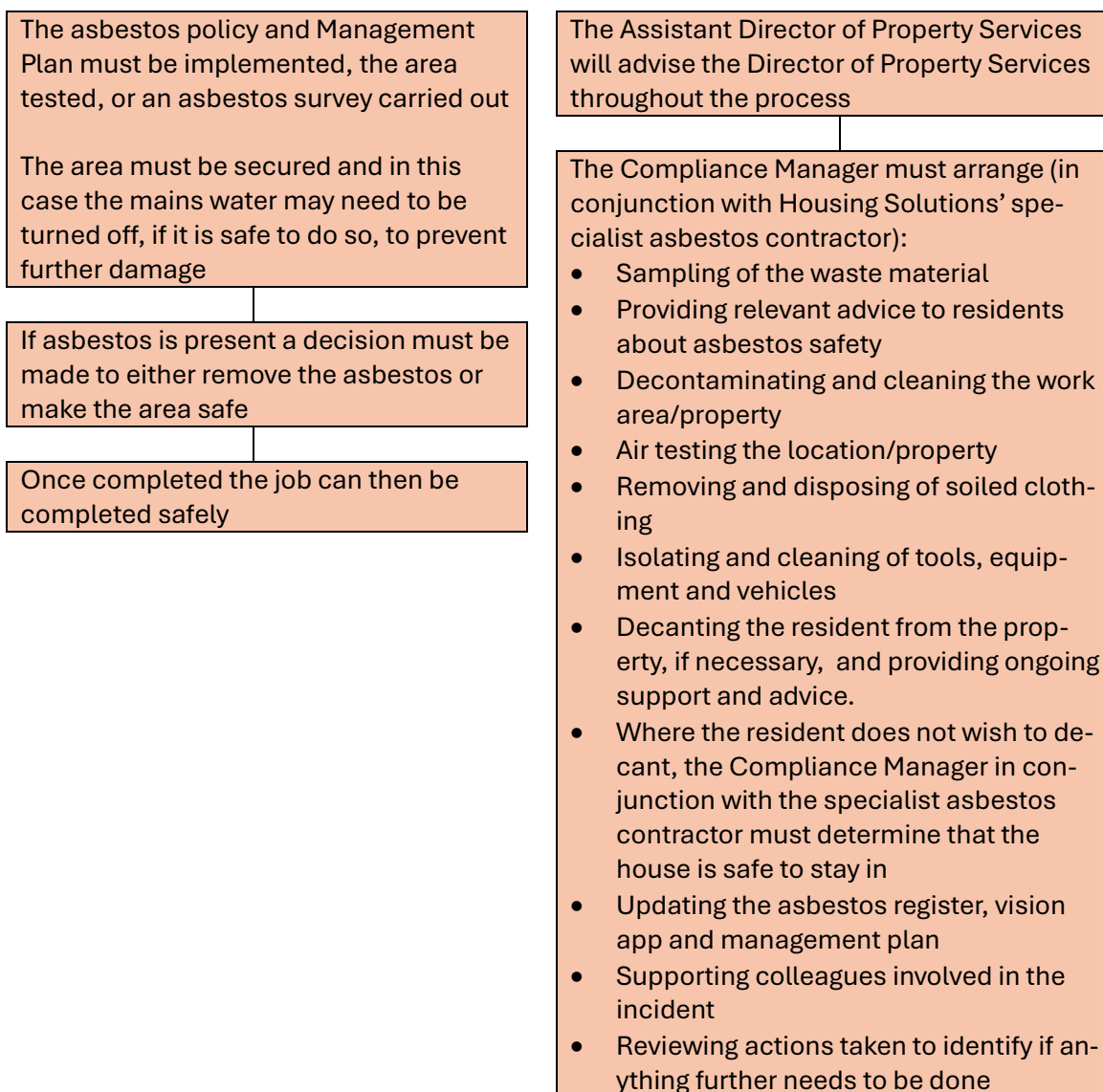
Operatives and residents must leave the work area immediately

The work area must be secured and made safe

The relevant supervisor must be contacted to report the issue and an Accident/Incident Reporting and Investigation Form completed

The supervisor must advise the Compliance Manager. If the Compliance Manager is not available a suitable colleague listed in the Asbestos Policy and Management Plan must be contacted

The Assistant Director of Property and the Health and Safety Manager must decide whether a formal health and safety investigation should take place



Scenario 3

A contractor attends a property owned by the organisation to carry out roof work and the following occurs:

- The asbestos survey is provided stating that there is no asbestos in the work area
- The roofing contractor lifts the roof tiles and encounters presumed asbestos containing materials – the materials were not disturbed
- The contractor stops work, makes the area safe and advises the organisation
- The Asbestos Policy and Management Plan is implemented, the asbestos containing materials are sampled, removed and made safe and the job is completed

Following the Incident

The asbestos register must be updated including the location of the asbestos

A new asbestos Survey is carried out

The new asbestos survey is added to the Vision App

The Compliance Manager will, prior to any roof works being undertaken at similar properties, implement the Asbestos Policy and Management Plan to ensure that potential asbestos is not present in the work areas

Contractors must be made aware of the asbestos location and copies of the surveys provided, prior to works being carried out on similar properties

An Accident/Incident Reporting and Investigation Form must be completed