



# Asbestos Management Policy

Policy Ref: PS03

<b>Prepared By</b>	Operations Director
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<b>Reviewed By</b>	PHA Board

## **1. Introduction**

- 1.1 The Asbestos Management Policy aims to ensure that the Association effectively complies with its landlord obligations whenever Asbestos Containing Materials (ACMs) are found in premises owned or occupied by the Association.
- 1.2 The Asbestos Management Policy (AMP) applies to all properties that are the responsibility of Partick Housing Association (PHA) to ensure the health, safety and welfare of our tenants, owners, contractors, staff and all other users and agencies where asbestos may be present in our properties.
- 1.3 The Management Plan sets out the mechanism by which Asbestos Containing Materials (ACMs) are managed. It includes details on how PHA intends to:
- protect those working on the fabric of our properties;
  - protect those working and living in our properties;
  - effectively control any works likely to affect ACMs;
  - identify and categorise ACMs, and manage hazards based upon prioritisation and assessment of the risk that they present; and
  - monitor and maintain the condition of identified ACMs that are assessed as being able to be left in-situ.
- 1.4 The presence of an ACM does not in itself constitute a danger. However the ACM may pose a hazard if disturbed or damaged and must be treated accordingly. The primary purpose of this plan therefore is to ensure that ACMs are not disturbed, except in a controlled environment during the removal process.
- 1.5 In order to fulfil our responsibilities, PHA will commission Approved Asbestos Consultants (AAC) to:
- undertake management, refurbishment or demolition asbestos surveys as appropriate;
  - carry out asbestos re-inspections where instructed by PHA;
  - label Asbestos Containing Materials (ACMs) in communal areas; and
  - at a later stage, provide and display floor plans within communal areas which identify whether asbestos is present or not, and pass all information to PHA.
- 1.6 PHA retains overall responsibility for the duties to ensure that this management plan is implemented so that the risk of asbestos exposure is adequately controlled using a risk based approach – see Roles and Responsibilities.

## **2. Roles and responsibilities**

### **PHA (Duty Holder)**

- 2.1 PHA is a 'Duty Holder' as defined within Regulation 4 of the Control of Asbestos Regulations 2012 (CAR).

- 2.2 As a Duty Holder, PHA has responsibility to do the following:
- Take reasonable steps to locate and identify the presence of Asbestos Containing Materials (ACMs) in its assets. This role may be assigned to an Approved Asbestos Consultant (AAC) who will carry out surveys of properties as necessary.
  - Produce, implement and review, at regular intervals, asbestos management plan for its assets.
  - Ensure that asbestos related information is issued to all organisations and persons who may potentially disturb ACMs during their activities working on PHA assets.
  - Ensure that an AAC freely shares information, either currently within its possession or obtained in the future, regarding ACMs within assets.
  - Train all personnel, where required, to ensure that they are competent to fulfill the requirements of their roles and responsibilities.

### **Delegated Duty Holders and Responsibilities**

- 2.3 The Operations Director is responsible for undertaking, or delegating the duties under Regulation 4 of the CAR. The delegated asbestos duty holder is the Property Services Manager. The delegated duties, in accordance with CAR as set out in the accompanying procedure.

### **General Contractors and Subcontractors**

- 2.4 Contractors and Subcontractors are responsible for the following:

- Compliance with current legislation associated with Approved Codes of Practice (ACoPs) and Guidance, also adhering to the Asbestos Management Policy, and any other relevant procedures.

### **Asbestos Removal Contractors**

- 2.5 Asbestos Removal Contractors are responsible for the following:

- Compliance with current legislation, associated Approved Codes of Practice (ACoPs) and Guidance, the Association's Asbestos Management Policy, and any other relevant procedures.
- Ensuring that all asbestos removal works are carried out in strict accordance with the Control of Asbestos Regulations 2012 and its supporting ACoP L143 Work with Asbestos Materials, and including any subsequent revisions to these documents.
- Carrying out enclosures and removal in accordance with HSG 247 Asbestos: The Licensed Contractor's Guide.
- Provision of a plan of work to an Approved Asbestos Consultant and the association's duty holder, including details of project resources, timetable and agreed emergency procedure.
- Provision of Statutory Notices to the relevant Statutory Authority prior to commencing asbestos works, or, by agreement and at the request of an Approved Asbestos Consultant, applying for a waiver from the minimum notice.
- Regularly inspecting the work environment, and reporting immediately any defects to an Approved Asbestos Consultant, and where instructed rectifying the defect.
- Provision of copies of notification and consignment notes and other relevant documentation with final account to an Approved Asbestos Consultant and the Association's duty holder.

## **3. Asbestos Information & Distribution**

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

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

#### **4. Surveys**

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

##### **Management Survey**

4.2 A management survey is the standard survey. Its purpose is to locate, as far as reasonably practicable, the presence and extent of any suspect ACMs in the building which could be damaged or disturbed during normal occupancy, including foreseeable maintenance and installation, and to assess their condition.

4.3 Management surveys will often involve minor intrusive work and some disturbance. The extent of intrusion will vary between premises and depend on what is reasonably practicable for individual properties. The survey will usually involve sampling and analysis to confirm the presence or absence of ACMs. However a management survey can also involve presuming the presence or absence of asbestos.

##### **Refurbishment or Demolition Survey**

4.4 A refurbishment and demolition survey is needed before any refurbishment or demolition work is carried out. This type of survey is used to locate and describe, as far as reasonably practicable, all ACMs in the area where the refurbishment work will take place or in the whole building if demolition is planned.

#### **5. Risk Assessment**

5.1 A risk assessment will be carried out:

- after a survey has been completed on a property;
- before any planned maintenance is carried out on a property; or
- before any reactive repairs are carried out in a property.

5.2 An Approved Asbestos Consultant is required to carry out a risk assessment on completion of every property survey. This risk assessment is composed of two parts, a **material assessment** and a **priority assessment**.

5.3 On receipt of the survey and risk assessment, PHA is required to carefully check the priority assessment and the recommendations for work from the AAC.

##### **Material Assessment**

5.4 The material assessment identifies high risk material that will most readily release airborne fibres, if disturbed. It does not automatically follow that those materials assigned the highest score in the material assessment will be the materials that should be given priority for remedial action.

##### **Priority Assessment**

5.5 The priority assessment considers the likelihood of the ACM actually being disturbed and exposing someone to asbestos fibres. For there to be risk to health it is not enough for it to be damaged or friable, but it also needs to be disturbed and get into the air we breathe. The priority assessment therefore considers the normal occupant activity in that area, the likelihood of disturbance and so on.

5.6 PHA is responsible for ensuring that material reviews and inspections are carried out regularly. This work will be issued to an Approved Asbestos Consultant.

- 5.7 A full record of periodic reviews and re-inspections will be maintained on the Asbestos Register System, along with any necessary changes to the Material Assessment and Priority Scores. The non-domestic housing properties periodic reviews and re-inspections will be maintained on the Association's data base, the QL system.

## **6. General works**

### **Planned Maintenance / Upgrade Works**

- 6.1 Before commencing any planned maintenance or upgrade a full risk assessment must be undertaken by PHA or its designated designer. Where the risk assessment indicates it is necessary, the Asbestos Register should be checked for any survey report that may have been done on the property.

### **Responsive Repairs**

- 6.2 PHA will flag up any asbestos risk assessment on every responsive repair line sent to the contractor. The Asbestos Register System is available to contractors for all PHA stock including domestic dwellings and flat common areas, and it is their responsibility to check the Asbestos Register System for a report on the property in question, and to request a survey if no report is available.
- 6.3 Where maintenance of a non-domestic property is to be carried out, no work should be undertaken by the contractor until he has obtained a copy of the asbestos register for that building. If there is any suspected asbestos containing material found, work should stop immediately and the Emergency Procedure should be implemented.

### **Asbestos Containing Materials (ACMs) uncovered during works**

- 6.4 Where suspected ACMs are disturbed or uncovered during works the Emergency Procedures should be implemented. Under no circumstances should the material be disturbed by anyone.

## **7. Removal, encapsulation and remedial works**

- 7.1 Although certain asbestos removal or remedial activities do not necessarily require the use of a Licensed Asbestos Removal Contractor, to maintain quality of service PHA will only use Approved, Licensed Asbestos Removal Contractors to carry out any asbestos removal, repair or remedial works under its control. This is irrespective of whether the particular asbestos work is licensable or non-licensable.
- 7.2 In the event of any occurrences, the type and extent of works required will first be agreed between PHA and an Approved Asbestos Consultant.

## **8. Emergency Procedures**

- 8.1 When a suspected ACM is reported to PHA by a member of staff, contractor, resident or any other party it must immediately be reported to the Asbestos Duty Holder and an Approved Asbestos Consultant engaged to provide assistance in dealing with it. An Approved Asbestos Consultant must carry out an Environmental Assessment of the risk, and recommend action accordingly. The emergency procedure as detailed below and in the **HSE Asbestos Essentials Guidance EM1** must be adhered to.

## **9. Staff awareness / training Asbestos Awareness Training**

- 9.1 PHA will comply with Regulation 10 of the Control of Asbestos 2006: Information, Instruction and Training, by providing Asbestos Awareness training for all PHA and Partick Works staff who are liable to be exposed to asbestos, or who supervise those employees.
- 9.2 Any other contractor or sub-contractor who work on PHA's assets will comply with Regulation 10 of the Control of Asbestos 2006: Information, Instruction and Training, by providing Asbestos Awareness training for all PHA and Partick Works staff who are liable to be exposed to asbestos, or who supervise those employees.

9.3 The Asbestos Awareness training aims to balance the technical aspects of asbestos with the practical management. It will cover the Control of Asbestos Regulations 2012 and our continued obligations as a landlord to inspect common parts and manage works safely, and keep good records.

#### **Additional Training**

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

### **10. Asbestos Action Plan**

10.1 PHA will produce a localised Action Plan including:

- precise strategy for achieving targets set out in this management plan for surveying their assets;
- local procedures for information sharing, ensuring that all staff, contractors and residents are aware of asbestos information which affects them, in particular with regard to responsive repairs;
- access and updating of information on ACMs including the Asbestos Register;
- the management of known ACMs within all domestic and non domestic stock, including communal areas;
- a training plan for all front line staff, and additional training for any relevant managers.
- how the planned maintenance programme will resonate with the requirement to have an asbestos survey carried out before commencing works; and
- how the recommendations from an Approved Asbestos Consultant will be reviewed and instructing them according PHA judgement of most appropriate action.

### **11. Equalities**

11.1 Our Asbestos Management Policy complies with PHA's Equality Policy to ensure equality of treatment for all service users without discrimination or prejudice.

### **12. Data Protection and Confidentiality**

12.1 PHA recognises that confidentiality is important to service users and will treat their information in the strictest confidence in terms of the General Data Protection Regulation (GDPR) and our Privacy Policy.

### **13. Alternative Formats**

13.1 On request, the Association will provide translations of all documents, policies and procedures in various languages and other formats such as CD, large print, Braille etc. These can be obtained by contacting the Association's offices.

### **14 Policy Review Asbestos**

14.1 The Asbestos Management Policy will be reviewed every three years or more frequently where there has been a change in legislation, regulations or best practice.