



ASBESTOS POLICY AND MANAGEMENT PLAN

Date: 10.01.2025
Review: 09.01.2027

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ASBESTOS POLICY AND MANAGEMENT PLAN

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1.0 Statement

- 1.1 Asbestos is the collective name given to a group of fibrous materials that are flexible, mechanically strong, and resistant to stretching, heat and chemicals. It has been used in various building products and materials for some considerable time but was more commonly used in building construction in the periods between 1950 and 1980.
- 1.2 We recognise the possible presence of asbestos within some of the properties under our control. An effective asbestos management policy and associated plan is in place, to manage the risks to our residents, contractors, visitors, and staff.
- 1.3 The presence of Asbestos Containing Materials (ACMs) does not in itself represent a danger. However, asbestos is hazardous when damaged or disturbed and must be treated accordingly. Activities which give rise to airborne dusts e.g., breaking, sawing, cutting, and drilling asbestos containing materials, are the most likely to present risks.
- 1.4 This document sets out our policy to advise how we identify and manage Asbestos Containing Materials (ACM's) in our properties.

2.0 Aims

- 2.1 The purpose of this Policy and management plan (Appendix 1) is to effectively manage all ACMs across the property portfolio and to reduce the asbestos related risks to as low a level, as is reasonably practicable. It also seeks to ensure all asbestos works are scoped, serviced, and managed in accordance with legal requirements and best practice.
- 2.2 The overall aim of the policy is to ensure the health, safety, and wellbeing of all people in properties owned by RHS which may have ACMs within the fabric of the property. This also includes the fabric of any common areas of multi-tenure buildings managed by RHS.
- 2.3 We aim to protect the occupants and visitors to our properties including staff and contractors as far as is reasonably **practicable**.

3.0 Objectives

- 3.1 Asbestos is the single greatest cause of work-related deaths in the UK. We are committed to achieving the highest possible standards in safety, services, accommodation, and customer care that we provide to our customers.
- 3.2 Regulations controlling asbestos materials have evolved from regulations concerning the manufacturing and processing of asbestos, into regulations related to the control of the material.

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- 3.3 Under current regulations, RHS is required to have a sound Asbestos Policy and Management Plan to ensure everyone who either works for or on behalf of RHS, or who may use any facility provided by RHS, is not exposed to asbestos materials in a condition which may expose them to asbestos fibres.
- 3.4 RHS is committed to conducting our business in a way that protects the health, safety and welfare of its employees, tenants, residents of RHS, contractors and visitors. It recognises its responsibility to prevent exposure to the hazards associated with asbestos containing materials (ACMs). Consistent with this, we will:
- ✓ Ensure that all ACMs are effectively managed, and associated risks reduced, to as low as reasonably practicable.
 - ✓ Develop and implement an effective, robust, and efficient Asbestos Management Plan so that appropriate measures such as monitoring, labelling, encapsulation, inspection, or removal of ACMs is undertaken.
 - ✓ Maintain an up-to-date Asbestos Register.
 - ✓ Meet or exceed legislative requirements.
 - ✓ Promote awareness of the hazards associated with ACMs, the contents of this Asbestos Policy and the associated Asbestos Management Plan.
 - ✓ Freely provide information on ACMs to appropriate personnel and third parties.
 - ✓ Review this Asbestos Policy and Asbestos Management Plan every two years.
 - ✓ Have a standard notification within our work orders notifying contractors to assess our Asbestos Register if required.
 - ✓ Implement an effective management plan and ensure all persons who are required to disturb, repair, or remove asbestos are competent and/or licensed.

4.0 Legislation and Control

4.1 Control of Asbestos Regulations 2012

- Control of Asbestos Regulations 2012 updates previous asbestos regulations (2006) to take account of the European Commission's view that the UK had not fully implemented the EU Directive on exposure to asbestos (Directive 2009/148/EC). The Regulations set out a specific requirement to monitor and manage asbestos containing materials (ACMs) in communal areas and common parts of non-domestic and domestic buildings such as blocks of flats, foyers, corridors, lift shafts etc.
- The changes mean that some non-licensed work needs to be notified to the relevant enforcing authority. Written records should be kept of notified non-licensed work and by April 2015 all workers engaged in notified non licensed work must be under health surveillance by a doctor.
- All the previous requirements under the 2006 regulations remain the same and the changes do not make any difference to the standards of control for asbestos work.
- A new category of Notifiable Non-Licensed Work (NNLW) is implemented which gives a three-tier system:
 - Licensed Work: High risk, high fibre release e.g., removing loose insulation.
 - Non-Licensed Work: Low risk, low fibre release e.g., cleaning up small quantities of loose/ fine debris containing ACM dust.

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- New category (NNLW): Medium risk e.g., minor, short duration work to remove asbestos insulating board as part of a refurbishment project.

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

4.2 2010 Health & Safety Guidance (HSG) 264 guidance

- The 2010 Health & Safety Executive publication Guidance (HSG264) replaces Methods for the Determination of Hazardous Substances (MDHS) 100 guidance to ensure the effective monitoring and management of asbestos in all domestic properties provided by RHS. Health and Safety at work regulations also mean that domestic properties are covered by our Asbestos Management Policy to ensure RHS employees and tenants are not exposed to health risks in going about their work.
- HSG264 deals with the specific responsibilities for managing the risks from asbestos in non-domestic properties under the Control of Asbestos Regulations 2012.
- These regulations place responsibilities on Duty Holders (RHS), Employers, Surveyors, and those who commission surveys as well as landlords. The requirements placed on the duty holders are to ensure that:
 - ✓ All reasonable steps are taken to determine the location of materials likely to contain asbestos
 - ✓ All suspicious materials are presumed to contain asbestos, unless there are good reasons not to do so
 - ✓ A written record of the ACM's is made and maintained
 - ✓ The condition of the ACM is assessed and monitored annually
 - ✓ The risk of exposure from ACM's is assessed and necessary measures to manage the risk implemented
 - ✓ All necessary steps are taken to see that the actions are carried out.
- We must manage the risk in the following ways:
 - ✓ Keep and maintain an up-to-date record of the location, condition, maintenance and removal of all the ACMs on the premises
 - ✓ Repair, seal or remove ACMs if there is a risk of exposure due to their condition or location
 - ✓ Maintain ACMs in a good state of repair and regularly monitor their condition
 - ✓ Have arrangements in place so that work which may disturb ACMs complies with the Control of Asbestos Regulations 2012
 - ✓ Review the plan at regular intervals and make changes if circumstances change.

4.3 Health and Safety at Work Act etc. 1974

Under this Act, employers must conduct their work so their employees will not be exposed to health and safety risks. Employers must also provide information to other people about their workplace which might affect their health and safety. Therefore, there is a requirement

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to pass information regarding asbestos to employees and contractors when working in our premises/properties.

4.4 Management of Health and Safety at Work Regulations 1999

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

- Carry out a suitable and sufficient assessment of the risks for all work activities
- Record the assessments
- Implement the necessary control measure(s)
- Appoint competent persons
- Set up emergency procedures
- Provide information and training
- Work with others sharing the workplace

4.5 Construction Design and Management Regulations (2015)

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

4.6 Reporting of Injuries, Diseases or Dangerous Occurrences (RIDDOR)

All employees and contractors of RHS are duty bound to report an uncontrolled release of a substance that could be harmful to people under the requirements covered by the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR)

5.0 **Asbestos Survey and Removal Contractors**

5.1 Only those contractors registered with and licensed by the HSE, and approved by the board of the HSE, will be permitted to carry out an Asbestos survey and removal works in RHS properties or communal areas managed by RHS during reactive, cyclical and programmed works.

5.2 None of our staff are permitted to handle or carry out works on ACMs.

6.0 **Information and Instruction**

6.1 We make arrangements to ensure the following:

- Any relevant risk assessments, method statements and statutory notices are in place before works commence
- Copies of all test certificates, surveys and evidence of correct waste disposal are received and stored within the Asbestos Register
- That all employees are adequately informed and instructed regarding the identification, management and risk from exposure to ACMs

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- Any maintenance/refurbishment contractors are adequately informed and instructed regarding the identification, management and risk from exposure to ACMs
- All tenants/residents are adequately informed and instructed regarding the identification, management and risk from exposure to ACM's
- So far as is reasonably practicable, other people who are not employees but who may be at risk from the danger of exposure to ACMs also receive adequate information and instruction

7.0 Tenant Improvements

- 7.1 Prior to a tenant carrying out an improvement within a property owned by RHS which will interfere with the fabric and/or services of the property, tenants will be required to seek advance permission before beginning works.
- 7.2 Before issuing permission, the asbestos register will be consulted.
- 7.3 Where ACM's are identified within the proposed work zone the Asset Manager will liaise with the tenant to ensure all appropriate actions are taken.
- 7.4 Where the asbestos data is inconclusive, we will review the request and decide whether to refuse permission or to arrange for a survey to be carried out.
- 7.5 In the event the tenant's works are liable to disturb ACMs, we will make a decision on the appropriate course of action, ensuring all asbestos works are subject to the policy and management plan and appropriate legislative guidance.
- 7.6 Permission may be refused should the proposed works result in the removal of ACMs being required where previously they were maintained by monitoring the condition of the material. Related costs to carry out this work and potential exposure to the release of asbestos fibres will be considered in the review of the request.

8.0 Development and Training

- 8.1 Staff involved in the delivery, procurement and organisation of works on our behalf will be suitably trained to carry out their role, in line with the requirements of this Policy.
- 8.2 RHS will ensure all contractors carrying out Asbestos related works are suitably qualified to work in a safe and appropriate manner

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Appendix I

Asbestos Management Plan (AMP)

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

Identification of Asbestos

- RHS will increase the intelligence of our stock with regards to asbestos by carrying out surveys to establish the presence, location and type of asbestos contained within a property owned by RHS. Surveys will be carried out as follows:
 - Management survey on void properties (built before 2000) when major works are being carried out and ACMs are suspected
 - Management or Refurb/Demo survey on properties due for major repairs (built before 2000) where ACMs are suspected
 - Management or Refurb/Demo survey on properties due for medical adaptations (built before 2000) where ACMs are suspected
 - A 10% sample of stock not subject to any of the above.
 - 20% sample of all common areas within closes that we manage
 - Use of cloned data based on stock type, date of construction, refurbishment works carried out and previous survey information.

The survey type is determined by the scale of the work:

Management survey

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

Refurbishment and demolition survey

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

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- Where improvement programmes are to be undertaken in the housing stock for example: kitchen and/or bathroom replacement programmes, a representative sample number of Refurbishment & Demolition surveys will be carried out on each property type included in the project.
- Surveys will be undertaken by a UKAS Accredited surveyor/ organisation.
- Surveys will identify and record the location, extent, condition, and type of any known or presumed ACM.

Management Strategy

- RHS will appoint a suitably qualified contractor to carry out asbestos surveys and assess the risk in relation to ACMs by carrying out a material risk assessment and detailing:
 - Property code
 - Property address
 - Material type
 - Location
 - Damage
 - Surface treatment
 - Asbestos type
 - Recommendations to remove/monitor/label/manage
- Each ACM is assigned a score to reflect its asbestos type, condition and surface treatment. This informs the categorisation of the potential for fibre release. The survey makes recommendations and assigns a priority category to the ACM.
- The asbestos register forms the basis of the asbestos management plan. Survey results (including negative results) will be recorded on the asbestos register by the Asset Manager/Repairs Officer and a copy of the report saved in H:Drive/Compliance/Asbestos.
- Where no information regarding ACMs is available e.g., areas that could not be accessed during a survey it must be presumed that ACMs are present, and the register will reflect this.
- It is not our policy to remove ACMs that are in good condition and present insignificant risk to the health of the building occupants, however we recognise the need for flexibility where there is a case made for specific removal.
- If we decide to leave the asbestos as is, then we will:
 - ✓ Log the details on the register and refer user to survey which will include a floorplan of the property with ACM areas highlighted.
 - ✓ Ensure that all tenders for planned and cyclical works include reference to the Control of Asbestos Regulations 2012 and RHSs asbestos register.
 - ✓ Work orders for reactive repairs will highlight areas of ACM.
- Damaged ACMs will be made safe either by sealing, encapsulating or by removing the ACM entirely. The asbestos register will be updated to reflect the action taken.

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Communicating with our Contractors

- Prior to any work being instructed and carried out in properties owned or managed by RHS, the Asbestos register must be consulted and information in relation to ACMs communicated to contractors. This will be a standard line on our work orders.

Contractors Responsibilities

- Contractors (including sub-contractors) working for RHS are responsible for ensuring that all employees under their control reference the Asbestos Register and understand its content and actions required. They are also responsible for ensuring all employees under their control work in line with RHSs Asbestos policy and management plan.
- Prior to starting a job, if a contractor suspects the presence of asbestos they must not start works and contact us for advice. If the property has not been previously surveyed and was constructed prior to 2000, works must be postponed until a survey is carried out.
- If during the course of any work, asbestos or material suspected of being asbestos, not identified by the asbestos register is discovered, the contractor will ensure that:
 - ✓ All work is stopped in the area
 - ✓ All persons are removed and kept out of the immediate vicinity without causing undue concern
 - ✓ The area is closed, sealed or locked off (where practicable)
 - ✓ Any equipment or materials are left in place. These will require to be disposed of as special waste depending on the result of sampling
 - ✓ A warning sign(s) with the following, or similar, wording: 'POTENTIAL ASBESTOS HAZARD - KEEP OUT' is prepared and prominently displayed. Where this is not deemed appropriate to use this type of wording alternative strict entry prohibition notices will be used
 - ✓ The Asset Manager is immediately notified.
 - ✓ Arrangements are made for the suspected ACM to be sampled by a competent Asbestos Surveyor and analysed by a UKAS Accredited Laboratory.

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

Ongoing Monitoring

- All asbestos records and procedures must be regularly monitored and reviewed. It is imperative that all asbestos documents are kept up to date and are accessible. The asbestos register is an excel spreadsheet located on the common drive:
 - H Drive/compliance/asbestos
- The register is set up to be “read only” for the majority of staff. Editing permissions are set for the Asset Manager and Repairs & Compliance Officer.
- Any changes to the condition and location of any known or suspected ACM's must be recorded on the asbestos register and associated files. Similarly any removal work must be recorded.
- The Asbestos Regulations also include the 'duty to manage asbestos' in non-domestic premises. This part of the regulations will not apply to us as at this time as the only non-domestic premises we have is the newly built community centre, built in 2016 which will be free from any asbestos containing materials.

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- We should have an awareness of the duty, should the acquisition of any non-domestic premises in the future be considered.

Identification of damaged or disturbed suspect material

- It is the responsibility of staff and contractors to immediately report to RHS, if they suspect that disturbed or damaged ASB's may be present in a building owned or partly owned by RHS. Where this is suspected, the following applies:
 - Immediate contact to be made with a licensed asbestos survey contractor to identify if the material contains ACM's
 - Where damage to any material known to contain asbestos has taken place and is likely to give rise to airborne respirable fibre release, the area must be isolated pending air monitoring tests being carried out. Air monitoring tests will determine the level of any potential contamination or provide reassurance that unacceptable contamination has not occurred.
 - Details of air test results will be made available for record purposes
 - Remedial action will only be required when airborne fibre levels exceed levels as stated in the 2010 Health & Safety Guidance (HSG) 264 guidance
 - When remedial action becomes necessary after exposure, the relevant facts may have to be reported to the HSE in accordance with RIDDOR. Advice may be sought from a licensed asbestos survey contractor to determine whether the incident is in fact RIDDOR reportable.

Review of the Policy and Management Plan

- The Policy and Management Plan will be reviewed in bi-annually to take into account:
 - Legislative, regulatory, and good practice requirements
 - Our performance
 - The views of Board, residents, and staff
 - The corporate Risk Register
 - Our aims, objectives, and asset management strategies