

Asbestos Management Policy

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1. Statement of Objectives

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

1.2 The Asbestos Management Policy aims to ensure that the Association effectively administers compliance with its landlord obligations whenever Asbestos Containing Materials (ACMs) are found in premises owned or occupied by the Association. The policy objectives are:

- taking all reasonably practicable steps to prevent our tenants, staff, contractors and others from breathing in asbestos fibres and to raise awareness of the risks involved in disturbing asbestos containing materials;
- maintaining our housing stock in accordance with the relevant and applicable legal requirements placed on us and responsibilities set out in our tenancy agreement;
- ensuring that systems are in place to enable compliance with our landlord duties in relation to asbestos management;
- taking steps to locate any asbestos containing material in our housing stock and premises and assess its condition;
- procuring appropriately qualified contractors to test, assess and remove asbestos containing materials where necessary within the homes of tenants in line with legislative requirements;
- maintaining a detailed and up to date asbestos management register, including records of the location and condition of asbestos containing materials and assessed risk, to enable safe working practices for all staff and contractors;
- providing information and advice on the location, type and condition of all asbestos material to all contractors or others who may be in a position to disturb it – we will provide all contractors, whether main or sub-contractors, with information from our asbestos management register at tender stage and works orders stage of affected individual properties prior to entry; and
- collecting and using business intelligence on the condition of our stock and presence of asbestos to make informed financial decisions to maintain and improve our stock.

2. Compliance with Regulatory Standards

2.1 In terms of the Scottish Social Housing Charter, the Scottish Housing Regulator has identified a number of key indicators relevant to housing maintenance by which it will measure landlord performance, including the following:

- Meet the Scottish Housing Quality Standard (SHQS)
- Meet the Energy Efficiency Standard for Social Housing (EESH) by March 2020

- When they are allocated, are always clean, tidy and in a good state of repair.
- That tenants' homes are well maintained, with repairs and improvements carried out
- When required, and tenants are given reasonable choices about when work is done.
- Tenants, owners and other customers receive services that provide continually improving value for the rent and other charges they pay.

3. Expected Outcomes

3.1 Key outcomes of operating an effective Asbestos Management Policy include:

- ensuring that properties are well maintained, safe, secure and in line with the SHQS;
- providing assurance in relation to the safe management of asbestos containing materials; and
- delivering value for money.

4. Informing and Involving Stakeholders

4.1 We will promote our Asbestos Management Policy through our newsletter, website and tenancy handbook. Where we plan to make significant changes to the policy, we will consult tenants in line with our Customer Engagement Strategy.

5. Corporate Fit

5.1 Legislation and best practice

5.1.1 We will comply with all relevant legislation and associated regulations, including:

- The Health & Safety at Work Act 1974
- The Housing (Scotland) Act 1987, 2001 & 2010
- Construction (Design and Management) Regulations 2015
- Control of Asbestos Regulations 2012
- L143 (Second Edition) Managing and Working with Asbestos: Control of Asbestos Regulations 2012
- INDG 223 a short guide to Managing Asbestos in premises.
- HSG264 Asbestos: A survey Guide
- HSG227 Comprehensive Guide to Managing Asbestos in Premises
- Introduction to asbestos essentials – Comprehensive Guidance on Working with Asbestos in the Building Maintenance and Allied Trades HSG213

5.1.2 Our Asbestos Management Policy is consistent with our:

- Corporate Strategy
- Business Plan
- Housing Maintenance Policy Guide
- Estate Management Policy Guide
- Asset Management Strategy
- Health and Safety Policy

- Risk Management Strategy
- Procurement Strategy
- Delegated Authority Policy

5.1.3 Other related documents include:

Equalities

Our Asbestos Management Policy complies with CVHA's Equality Policy to ensure equality of treatment for all tenants without discrimination or prejudice. At all times CVHA will therefore consider all tenants, regardless of sex, faith or religion, race, ethnic origin, sexual orientation, mental or physical health, disability or marital status.

Confidentiality

CVHA recognises that confidentiality is important to tenants and will treat their tenancy information in the strictest confidence under the Data Protection Act 2018 and in line with CVHA's Openness and Confidentiality Statement.

Business Plan and risk management

Our Business Plan reflects that asbestos management is a key landlord responsibility. We seek to mitigate against business risk through managing asbestos containing materials in an efficient, effective and economic manner.

Responsibilities

The Investment Director has responsibility for overseeing the implementation of the Asbestos Management Policy and the Housing Maintenance Manager is responsible for key aspects of the day to day service delivery with delegation of specific tasks to appropriate staff.

Function / task	Responsibility
Asbestos Management Policy – review, amendment & approval	Board
Asbestos Management Procedures – development, monitoring & review	Investment Director and Housing Maintenance Manager to develop operational procedures that reflect the principles set out within the Asbestos Management Policy.
Ensuring regular and routine inspections of ACMs identified in the Asbestos Survey Information are undertaken, Informing and/or seeking advice of any amendments considered necessary to the asbestos register survey information. Isolating the area adjacent to any ACMs or suspected ACMs if they are disturbed or damaged and follow the emergency procedure.	Housing Maintenance Manager / Asset Manager
It is an employee's responsibility to: <ul style="list-style-type: none"> • Report any defects to suspect materials to their superior. • Ensure Method statements and risk assessments are sought from contractors prior to carrying out associated works in the local vicinity of ACM's • Make full and proper use of any control measures provided. • Keep work areas clean and immediately report any damage that occurs to suspect materials. 	Technical Inspectors
Consulting and management services to all asbestos removal projects. Advice regarding Safe Systems of Work. Live updating of the asbestos register and monitoring identified ACMs on an annual basis. It is the licensed contractor's responsibility to: <ul style="list-style-type: none"> • Carry out all works in full accordance with all current and relevant legislation and Approved Codes of Practice • Provide statutory notifications to the relevant enforcing authority • Provide detailed method statements and risk assessments • Dispose of any waste in accordance with the Hazardous Waste Regulations 2005 and provide consignment documentation /waste carriers license • Ensure all staff are fully trained and have the appropriate medical records • Provide adequate insurance cover. 	Asbestos Consultant - Environtec Ltd

6. KEY PRINCIPLES – ASBESTOS MANAGEMENT POLICY

6.1 Context

- 6.1.1 Legislation and regulations prescribe CVHA's landlord responsibilities in terms of asbestos management. CVHA's policy is therefore to ensure that relevant legislation and regulations are fully complied with in order that CVHA fully discharges its landlord responsibilities in terms of asbestos management.
- 6.1.2 CVHA's property database will be routinely updated to ensure that all properties that properties where asbestos is present are clearly identified and through its Asbestos Management Procedures, the Housing Maintenance Manager will ensure that competent contractors are instructed.
- 6.1.3 Where asbestos is referred to throughout this document it also refers to asbestos containing materials (ACMs). Compliance with the Control of Asbestos Regulations includes the duty to manage any asbestos containing materials in such a manner as to prevent the exposure of employees and customers to asbestos, or where this is not practicable, to reduce exposure to the lowest possible level. This includes:
- surveying and assessing those buildings deemed as presenting a risk of containing asbestos;
 - disseminating of information; and
 - Implementing methods for the prevention or reduction of exposure to asbestos fibres during such work.

6.2 Funding

- 6.2.1 CVHA will allocate sufficient resources from within its housing maintenance budget to manage asbestos.

6.3 Management of Asbestos

- 6.3.1 The 'duty holder' as defined in Control of Asbestos Regulations 2012, is responsible for the management of the process and in terms of CVHA this will be the Housing Maintenance Manager.

The duty holder will:

1. be the first point of contact for all matters relating to ACMs;
2. provide an internal source of information on all items relating to ACMs;
3. manage and co-ordinate asbestos surveys;
4. manage and maintain the Asbestos Register, including:
5. co-ordinating the input of new survey data; and
6. co-ordinating the updating of existing records to include all remediation works carried out;
7. ensure initial surveys are carried out within timescales;
8. co-ordinate the procedures for informing persons at risk as identified in this document;
9. liaise with internal and external contacts, surveyors, suppliers and contractors to provide a comprehensive Asbestos Register, capable of providing all information required by us to comply with this policy; and
10. Be the point of focus within the Association for all matters relating to ACMs and the Asbestos Register.

Organisation Chart: CVHA Management of Asbestos



7. Information, Instruction and Training

7.1 Asbestos is a mineral that is resistant to heat, fire and corrosive chemicals. There are three main types:

- Crocidolite (blue);
- Amosite (brown); and
- Chrysotile (white).

7.2 Asbestos is composed of small fibres, which can only be detected by using a microscope under laboratory conditions. Asbestos fibres are hazardous, and principally cause harm to the lining of the lungs when inhaled. As asbestos ages, weathers or is worked upon, it becomes more 'friable' and fibres may be released more easily. Typical locations of where asbestos can be found are detailed below:

- sprayed asbestos and asbestos loose packing – generally used as fire breaks in ceiling voids;
- moulded or preformed sprayed coatings and lagging – generally used in thermal insulation of pipes and boilers;
- sprayed asbestos mixed with hydrated asbestos cement – generally used as fire protection in ducts, firebreaks, panels, partitions, soffit boards, ceiling panels and around structural steel work;
- insulating boards used for fire protection, thermal insulation, partitioning and ducts;
- some ceiling tiles; and
- millboard, paper and paper products used for insulation of electrical equipment (asbestos paper has been used as a fire proof facing on wood fibre board);

7.3 Regulation 9 of the Control of Asbestos Regulations 2012 requires that: *"...Every employer shall ensure that adequate information, instruction and training is given to those of his employees...who are or are liable to be exposed to asbestos, or who supervise such employees...and those who carry out work in connection with the*

employer's duties."

- 7.4 To enable compliance with this Regulation, CVHA will retain all asbestos information relating to our properties within an Asbestos Database and will take all reasonable steps to keep the records up to date.
- 7.5 CVHA has utilised existing records of asbestos-containing materials in our property portfolio and incorporated these within our in-house Asbestos Register. If the planned work directly involves work on any identified or suspected ACMs, a Plan of Work will be produced in accordance with the requirements of the CAWR.
- 7.6 CVHA will undertake to source a preferred supplier of asbestos management training and to provide this training to all employees who require it. There will be regular reviews and refresher training as required. –
- 7.7 All work to be carried out on licensable asbestos material will involve the use of an HSE-licensed contractor. Where permitted under the Control of Asbestos Regulations 2012 CVHA contractors may carry out the works on non-licensable asbestos materials such as asbestos cement, floor tiles or roofing felt. All such contractors will be fully trained in asbestos awareness and in the use of Personal Protective Equipment (PPE) and Respiratory Protective Equipment (RPE) as appropriate.

8. Assessment of Property Portfolio

- 8.1 The first step of our assessment process is an initial assessment of the property stock, taking into account such factors as building age, type and use, together with an assessment of any existing records that may be pertinent.
- 8.2 CVHA has undertaken an initial assessment of their portfolio. This has enabled us to prioritise, as necessary, more detailed surveys of those properties deemed to be likely to contain asbestos.
- 8.3 CVHA has also undertaken surveys of existing house types to prioritise as necessary, more detailed surveys of those properties deemed to be likely to contain asbestos. Any such assessments will be completed on an 'as necessary' basis, upon acquisition of any further properties.

9. Assessment of ACMs

- 9.1 CVHA has carried out comprehensive surveys of ACMs within our buildings. These surveys have enabled us to be aware of the exact location, extent and condition of ACMs within our properties.
- 9.2 Regulations 4(3) to 4(5) of the Control of Asbestos Regulations 2012 set out the requirements for assessment of the properties under the control of CVHA. These require that: *“The duty holder shall ensure that a suitable and sufficient assessment is carried out as to whether asbestos is or is liable to be present in the premises.”*
- 9.3 CVHA’s specialist asbestos management consultants have carried out Management Surveys, in line with HSG 264 Asbestos Survey Guide. CVHA ensures that all external consultants and contractors working on such activities are suitably experienced and UKAS accredited (ISO/IEC 17020 / 17025). All asbestos surveyors used by CVHA will be trained, as a minimum, to BOHS P402 Certificate (or equivalent) standard – they must be able to demonstrate the necessary experience and ongoing training records necessary to show proper competence in carrying out asbestos surveys.
- 9.4 CVHA will also ensure that Refurbishment or Demolition Surveys are carried out prior to any demolition work or major refurbishment. CVHA defines ‘major refurbishment’ as such work covered by the Construction (Design and Management) Regulations 2015.
- 9.5 In all cases, surveys of premises for the purposes of identification and assessment of ACMs will be carried out in full accordance with HSG 264 Asbestos Survey Guide. Such surveys will include numerical assessment of the condition of any identified ACMs. This Material Assessment Score (MAS) will depend upon the material in question, its condition, any surface treatment and the type of asbestos it contains.
- 9.6 The findings of all surveys will be used for management purposes, and included within the electronic Asbestos register, to highlight any identified ACMs to contractors working within the area or dwelling.

10. Assessment of Risk

- 10.1 The Control of Asbestos Regulations 2012 sets out the requirement to undertake an assessment of the risk of exposure of persons to asbestos fibres. The assessment of risk will utilise the results of the MAS for the identified ACMs.
- 10.2 CVHA will determine the priority for management of ACMs by assessing the likelihood of those materials being disturbed. This priority assessment will take into account such factors as maintenance activities, likelihood of disturbance, human exposure potential and occupant activity.

11. Asbestos Management Plan

- 11.1 Following the requirement to comply with Control of Asbestos Regulations 2012, CVHA has undertaken to implement a suitable plan for the management of all Asbestos Containing Materials (ACMs) within our properties. As each identified ACM in these properties is likely to have unique characteristics in terms of type of material, occupancy of area and so forth, it is not feasible to set out the management plan for each material in this document. However CVHA’s approach regarding the planned management of ACMs is set out below.

12. The Plan

- 12.1 The scope of the Management Plan covers all CVHA premises (with the exception of those that have been deemed as presenting no foreseeable risk of containing asbestos, i.e. those where construction commenced after 1999). The Plan will ensure that all necessary measures for controlling the risk of exposure are implemented.
- 12.2 These measures will include, but are not limited to:
- monitoring of the condition of identified and suspected ACMs;
 - ensuring information is disseminated as required;
 - reviewing the Management Plan, both on a regular planned basis, with additional reviews if there is reason to believe it is no longer valid;
 - ensuring that measures specified in the Plan are implemented according to the Plan, and recorded in the Plan.
- 12.3 The Asbestos Management Plan will be reviewed periodically or more frequently where there has been a change in legislation, or if arrangements within the plan are no longer considered to be adequate, in order to assess:
- Effectiveness of the management plan
 - Overall progress made against the Action Plans
 - Suitability and maintenance of communication, instruction, training of personnel, employees and contractors
 - Suitability and success of monitoring mechanisms
 - Any updates as a result of legislation changes or incidents
 - Records of the review will be kept.

13. Management of ACMs in CVHA Properties

- 13.1 CVHA has undertaken to identify as far as reasonably possible all locations of ACMs within our property portfolio. However there may be areas within the structure of the buildings not accessible under the constraints of the management surveys undertaken.
- 13.2. Refurbishment surveys will be completed prior to any works commencing where the proposed works are likely to disturb the fabric of any buildings that are in a risk category – Pre 2000 build)
- 13.3 CVHA has an asset management database within our internal computer system, which incorporates an Asbestos Register. This identifies the location of ACMs and extracted information is provided to contractors in the event of routine and planned maintenance, so that the contractor will undertake a thorough assessment of the area prior to commencing any work.

14. MISCELLANEOUS

14.1 Glossary

CDM	Construction (Design and Management) Regulations 2015
HSE	Health & Safety Executive
HSWA	Health & Safety at Work Act 1974
MAS	Material Assessment Score
MHSWA	Management of Health & Safety at Work Regulations 1999
PPE	Personal Protective Equipment
RPE	Respiratory Protective Equipment