

Asbestos Policy

Policy	Asbestos Policy							
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Approved by	MC	<input type="checkbox"/>	EMT	X	MT	<input type="checkbox"/>		
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Policy Champion	Asset Manager							
Who this policy affects	Staff	X	Customers	X	Contractors	X	Members of the Public	X
Where this policy affects	General needs	X	Sheltered	X	Supported	X	Offices/staff base	X

H&S Assessment Completed	Yes	X	Date Completed:	17/02/2017
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Contents

1. Purpose of this Plan	Page 2
2. Legislative Background and Guidance	Page 2
3. Aims of the Policy	Page 3
4. Associated Policies	Page 3
5. Outcomes of the Policy	Page 3
6. Procedure	Page 4
7. Reactive Repairs	Page 6
8. Staff Training and Development	Page 7
9. Complaints	Page 7
10. Measuring Performance	Page 7
11. Policy Review	Page 8
12. Equality and Diversity	Page 8
13. Risk Management	Page 8
14. Responsibilities Chart	Page 8

Appendices

1.2 Health and Safety Executive Asbestos Flowchart	Page 10
1.3 Asbestos Coatings/ Pipe/ Vessel Insulation in Poor Condition	Page 11
1.4 AIB & Insulating blocks in poor Condition	Page 12
1.5 Other asbestos materials in poor condition	Page 13
1.6 Policy Implementation Checklist	Page 14

1. Purpose

- 1.1 This policy explains how Loreburn Housing Association will manage the risk posed by asbestos containing materials (ACMs) and materials presumed to contain asbestos at premises owned, managed, or controlled by the association.
- 1.2 The policy also ensures compliance with the duties placed upon it by the items of legislation detailed in section 2 of this policy document.
- 1.3 Loreburn H A will promote good practice and partnership working in relation to the safety relating to asbestos and the associated risks.

2. Legislative Background and Guidance

- 2.1 Asbestos is a naturally occurring fibrous material used in a large range of building materials and products. When materials that contain asbestos are disturbed or damaged, fibres are released into the air. When these fibres are inhaled they can cause fatal serious diseases, for example Mesothelioma, Asbestos-related lung cancer, Asbestosis, Pleural thickening.

Further information is available from <http://www.hse.gov.uk/asbestos/dangerous.htm>

- 2.2 In preparing this policy we have taken account of the following legal obligations and guidance:

Health and Safety at Work Etc. Act 1974

Management of Health and Safety at Work Regulations 1999
Control of Asbestos Regulations 2012

The Workplace (Health, Safety and Welfare) Regulations 1992
Construction (Design and Management) Regulations 2015

Construction (Health, Safety and Welfare) Regulations 1996

“Managing and working with asbestos” – Control of Asbestos Regulations 2012 L143
(second edition) Published 2013

The HSE Guidance Note, Asbestos: The survey guide” HSG 264 ACoP Guidance L5
– The Control of Substances Hazardous to Health Regulations 2002

MDHS 100, Surveying, sampling and assessment of asbestos-containing materials
HSG248 Asbestos: The Analysts’ guide for sampling, analysis and clearance
Procedures

The HSE Guidance Note “A comprehensive guide to Managing Asbestos in
premises HSG227”

DETR, Asbestos and man made mineral fibres in buildings

A HSE Task Manual: Introduction to Asbestos Essentials HSG 213

A HSE Task Manual: Asbestos Essentials HSG 210

For further information <http://www.hse.gov.uk/asbestos/>

3. Aims of this Policy

- 3.1 Through this policy we aim to establish procedures to ensure compliance with respective legislation and guidance and protect the health, safety and welfare of our customers, employees, contractors and visitors.
- 3.2 To promote effective communication with all stakeholders and partner agencies.
- 3.3 To achieve continuous improvement in the overall by setting and monitoring targets and improving performance where practicable.
- 3.4 To implement processes in an efficient manner and ensure the overall approach meets the provisions of the association's Health & Safety Policy and Risk Management Policy.
- 3.5 To ensure respective services are procured in line with the Association's Procurement and VFM Strategy, Procurement Policy, Financial Regulations and Standing Orders.
- 3.6 To have a system in place for prioritising surveys / re-surveys. For example planned maintenance works.
- 3.7 To gain feedback from customers and contractors to help improve the service
- 3.8 To implement the associations Asbestos Management Plan (see Appendix one), maintain the Asbestos Register and effectively manage ACMs
- 3.9 To regularly update EMT, Health & Safety Committee and Management Committee on performance

4. Associated Policies & Information

- Voids and Reactive Repairs Polices
- Aids and Adaptations
- Planned Maintenance Policy
- Cyclical Maintenance Policy
- Risk Management Policy
- Health & safety policy
- Asset Management Strategy
- Stock Condition Surveys
- Building Performance Standards
- Asbestos Register

5. Outcomes from this Policy

- 5.1 The anticipated outcome of this policy is to:-
 - Minimise the risk to residents, staff, consultants, contractors, the public and visitors from exposure to ACM's on premises owned, managed, or controlled by the association

- Manage Asbestos Containing Materials (ACMs)
- Ensure asbestos does not become a risk to staff, contractors and customers by undertaking inspections and surveys
- Ensure asbestos information is available to staff, contractors and customers
- Implement and maintain our asbestos register, policy and management plan for all properties owned or managed by the Association
- To ensure that works which may involve contact with the, protection, encapsulation or removal of ACM's is undertaken strictly in accordance with regulatory requirements, ACOP and guidance documents published by the HSE to ensure, so far as is reasonably practicable that no one is put at risk.
- The association commits to undertake surveys to a meaningful proportion of properties owned or managed and built before the year 2000 to determine the presence of ACM's. This data will be held on the associations IT system which will be accessible to all staff.

6. Procedure

- 6.1 The Health and Safety Executive Flowchart (**Appendix One**) sets out how Loreburn H A will address issues relating to asbestos and its management.
- 6.2 For maintenance and repair work carried out to the Association's properties the following process is followed:-
- Where any works will cause any disturbance to the fittings and fixtures in a property or the fabric of the building, the Association is committed to undertake survey work as may be necessary to ensure that any asbestos containing materials which may be disturbed during the works are identified.
- 6.3 Surveys may be localised intrusive investigations in the area concerned to supplement the associations existing information. Where any disturbance to the fabric of the building is to be undertaken then the Association is committed, in accordance with the Guidance provided in HSG264, to commission specifically scoped Refurbishment and Demolition Surveys, the only deviation to this will be where the advice of a competent asbestos consultant / survey advises the association otherwise.

The two types of asbestos surveys are detailed below:-

Management Survey – is a survey carried out to access all areas of a property as far as is reasonably practical in order to establish if asbestos is present. This type of survey would be carried out if maintenance works/repairs are not deemed to be major/invasive refurbishments. This is normally a visual survey. The association currently has Management survey data for 100% of its stock built before 2000.

Refurbishment/Demolition (R&D) Survey – is a targeted survey to a specific area where work will be undertaken. This survey is fully intrusive in order to access all required areas of the building where major refurbishment or demolition works are to take place. This type of survey is required even if a management survey has already been carried out and refurbishment/demolition is due to take place.

- 6.4 Every programme of works is checked against the Asbestos Register to establish if any of

the properties in the programme contain ACMs. For all works including home improvements, planned and cyclical works and projects the Technical Officer will be responsible for ensuring that where necessary additional surveys are carried out to locate ACMs which may not have been identified by the original HSG 264 Management Surveys and which may be encountered or disturbed by the works to be undertaken and the information recorded appropriately onto the data management system. If it is the case that work which disturbs the fabric of any building then these Officers will be responsible for ensuring that there are procedures in place with adequate budgetary allowance to undertake specifically scoped Refurbishment and Demolition Surveys as detailed HSG 264, "Asbestos: The survey guide" prior to any works commencing on site

- 6.5 The Technical Officer will ensure that effective systems are in place to provide all contractors with the information relating to the presence of ACMs in properties before any work is carried out. The Technical Officer will also ensure, in cooperation with the Management of any external contracting organisations, that those involved in the implementation of the responsive maintenance works have been adequately trained so as to ensure that they can understand asbestos survey data, recognise ACMs and be able to carry out work in the vicinity of these materials
- 6.6 The Technical Officer will ensure before the implementation of any work, checks will be undertaken to determine whether ACMs are present within the property concerned initially by way of reference to the asbestos management database. If it is the case that ACMs are present then the Officer will ensure that this information will be taken into consideration for the purposes of the risk assessment and method statement for the works by the contractor. Where considered necessary additional specifically scoped Refurbishment and Demolition Surveys will be undertaken to identify any ACMs which may be exposed and disturbed as a consequence of the proposed works and the database updated accordingly via the data management system.
- 6.7 Acquisition of Properties - Prior to completing the purchase of existing structures a Management Survey report from the vendor will be requested. If asbestos is present in the property the cost of remedial works will be considered prior to the purchase. If the property is purchased the results of the survey report and any remedial action taken will be added to the asbestos register.
- 6.8 Construction/ Demolition / part Demolition – This will require the association while undertaking construction and demolition projects to provide all necessary pre-construction information relating to the risks associated with any properties. This will include information regarding the presence of hazardous materials such as asbestos will be provided to the Designers before any work begins and to ensure that all the hazards and risk associated with the Project can be taken into account during the design process. Further where the projects are Notifiable under the CDM Regulations it is a requirement that the information relating to known hazards and risks must be made available by the Client so that they and the Principal Contractor can develop the necessary construction phase Health and Safety plan and subsequently the Property Health and Safety File at the conclusion of project, which should be available for inspection to any person who needs to access the information.
- 6.9 Discovery of Asbestos - should materials believed to contain asbestos be discovered while works are being carried out to a property and were not on the existing asbestos register, work should cease immediately and the Director of Operations should be informed without delay. The advice of a qualified Asbestos consultant will then be sought.

7. Reactive Repairs

- 7.1 The Association is in a contractual relationship with Enterprising DG (EDG) for the provision of reactive repairs and gas servicing and is committed to provide sufficient information with respect to asbestos to allow their operatives to work safely and without risk to health.
- 7.2 The responsibilities for asbestos management within this relationship are as follows:
- Provision of Asbestos information is the primary responsibility of the association
 - It is the responsibility of the Association to notify EDG of the upcoming review of the procedure.
 - It is the responsibility of EDG to advise the Association of any issues regarding the procedure when a review is underway
- 7.3 It is the responsibility of the Association to provide information to EDG from the programme of archetypal asbestos surveys has been undertaken. These are surveys that have been targeted at parts of the structure where reactive maintenance is anticipated and include, but not be limited to:
- Services and utilities (electricity, water, drainage, gas etc.) with respect their entry into and distribution around the property (inclusive of kitchens, bathrooms, under floor and attic distribution).
 - Glazing (mastics and putties etc. to windows and doors which may require immediate work during replacement of windows, not including around frames which would be the subject of non-immediate work).
 - Doors, particularly any fire boards etc.
 - Common areas
- 7.4 It will be the responsibility of LHA to ensure this information will be uploaded to the stock management database as surveys are completed. Notes will be maintained on QL when a property was constructed post 2000 and no asbestos containing materials have therefore been used in construction. Surveys will be undertaken for each property archetype at each location or 10% of properties within each archetype at each location, whichever is the greater. This will ensure the Association is complying with HSE guidance HSG 227.
- 7.5 Accessing asbestos information for every reactive repair is the responsibility of EDG. It is the responsibility of EDG to pass on all relevant information to any subcontractors. The association will periodically audit this process to ensure compliance. Outcomes of such audits will be reported to EMT and the Health & Safety coordinator
- 7.6 On receipt of a reactive repair EDG will be notified of any asbestos being present in the property through pre-loaded information of their operating system. If it is established that there is no asbestos risk present in relation to the works instructed, the works should be progressed. However, if it is established that the works will pose an asbestos risk EDG must refer the matter to the association prior to commencement of works.
- 7.7 It is the responsibility of EDG, contractors and Dumfries and Galloway Homes to plan and manage their work in full compliance with the Control of Asbestos at Work Regulations 2012. When a suspected ACM is discovered:

It is the responsibility of the contractor to notify LHA immediately and a site specific assessment will be undertaken.

LHA which may include consideration being given to provision of temporary services, re-housing the customer etc. until an informed decision on the works can be made.

- 7.8 Consideration will be given to cloning the asbestos information from similar house archetypes, which have already been surveyed. This action will serve to provide those undertaking maintenance works in these properties with an indication as to where ACMs are likely to be located before they commence maintenance works.

8. Staff training and development

- 9.1 The successful implementation of the policy and supporting procedures dependent on the knowledge and skills of staff implementing it.
- 7.2 Regular training will be provided to relevant staff to ensure a consistent approach and ensure they are carry out the roles and duties linked to the application of this policy.
- 7.3 Regular quality audits will be in place to check the effectiveness of the training and to ensure that procedures are followed consistently and fairly by all staff.

9. Complaints

- 9.1 Loreburn H A operates a Complaints Procedure that is available to any customer who is not satisfied with the way their case has been dealt with.
- 9.2. Details of the complaints procedure are detailed in Loreburn H A's Complaints Procedure leaflet that is available from the website of any office.
- 9.3. Loreburn H A's takes the learning from complaints to ensure when possible service improvements are made. Any complaints relating to asbestos will be used to monitor and improve the service.
- 9.4 If the customer is not satisfied with the outcome of their complaint and have exhausted the complaints process above, they have the right to refer the matter to the Scottish Public Services Ombudsman.

10. Measuring performance

- 10.1 Performance monitored through Loreburn H A's Performance Management Framework using the Scottish Housing Regulator Annual Return Indicators and Loreburn H A's Strategic Performance Indicators and operational performance indicators.
- 10.2. Annual targets for collection are set based on the Scottish Housing Regulators' ARC national performance data, HouseMark peer benchmarking and internal results.
- 10.3 Loreburn H A will consult customers, stakeholders and other agencies in order to continually measure good practice.
- 10.4 This policy will adhere to Loreburn H A's commitment to Continuous Improvement and Value for Money.

11. Policy review

- 11.1 The policy champion is the Asset Manager. The policy implementation checklist is set out below as **Appendix two**.
- 11.2 This policy will be reviewed **every three years** or as required due to legislative or regulatory change. The review will be completed by the Policy Champion and circulated to the Executive Management Team for approval.

12. Equality and Diversity

- 12.1 There are many reasons why people may have difficulties accessing our services. These may include dyslexia, illiteracy and mental illness. It is the duty of all staff to ensure these issues are taken into account to ensure that information is appropriately communicated in ways those individuals can understand.
- 12.2 Loreburn H A is committed to equality of opportunity and will ensure that policy and procedures will not unfairly discriminate against people on grounds of sex or marital status, racial grounds, disability, age sexual orientation, language or social origin, or of other personal attributes, including beliefs or opinions, such as religious beliefs or political opinions.
- 12.3 Loreburn H A can provide:
- Translation service for those for who English is not their first language.
 - Large text or audio tapes for people who are visually impaired.
 - Assistance for people who are profoundly deaf.
 - Assistance for people who have challenges around literacy and / or numeracy

13. Risk Management

- 13.1 Given the importance of the risks set out in this policy it is recognised that these have to be effectively managed. This will be achieved through the cyclical review of all Asset Management policies and procedures to ensure compliance with all legislative requirements and regulatory and best practice guidance.

14. Responsibilities Chart

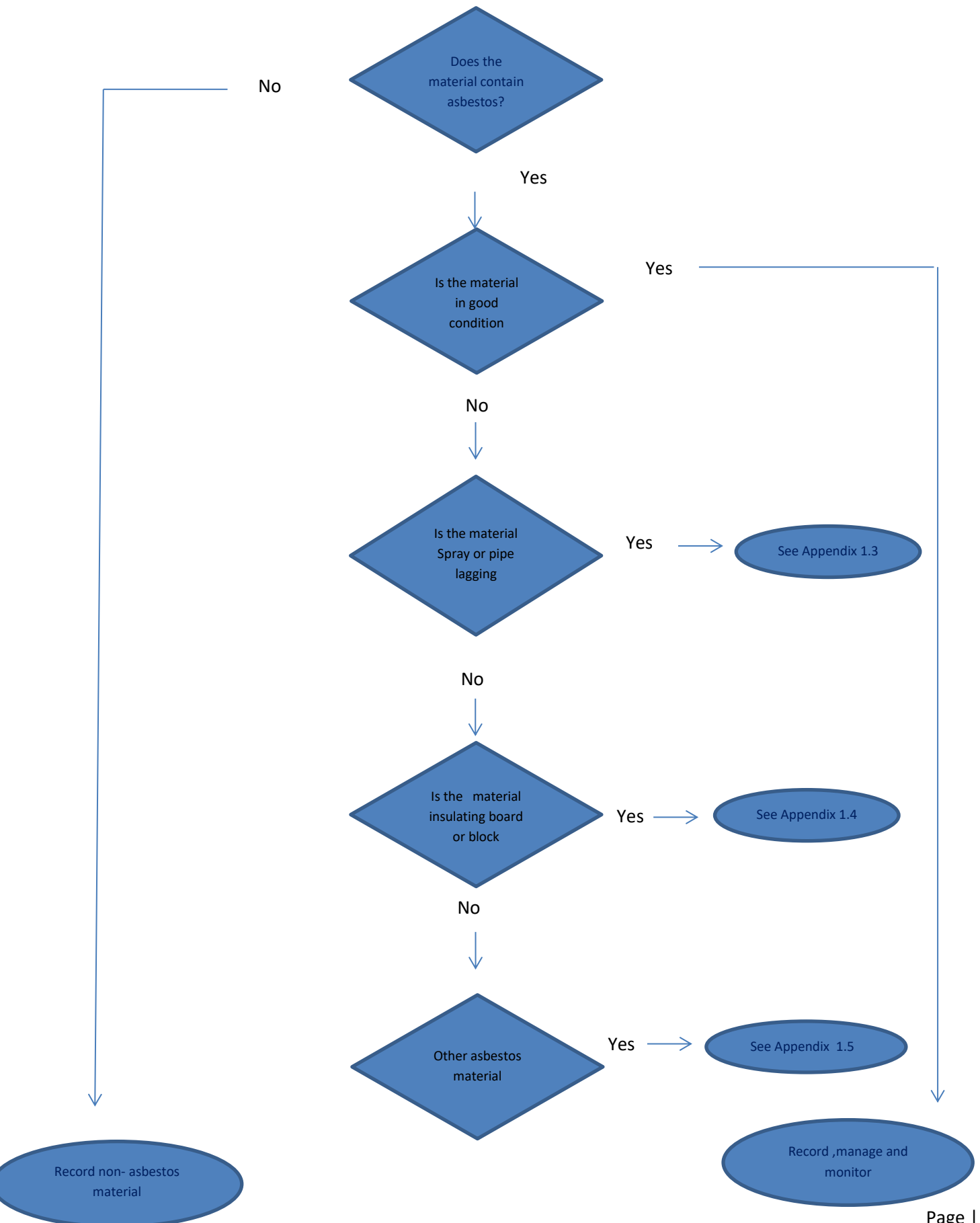
- 14.1 The chart below illustrates the responsibilities of all staff in relation to this policy.

Responsibilities	Board/ CEO	EMT	Asset Manager	Team Leader	All Staff
To set the policy and direction with regards to Asbestos	✓				
Ensure Loreburn H A staff have a robust understanding of Asbestos and the associated risks		✓			
Manage service, reporting and update EMT quarterly			✓		
Take lead on applications, make day to day decisions				✓	
Policy Champion			✓		
Ensure effective and clear communication with key stakeholders including				✓	

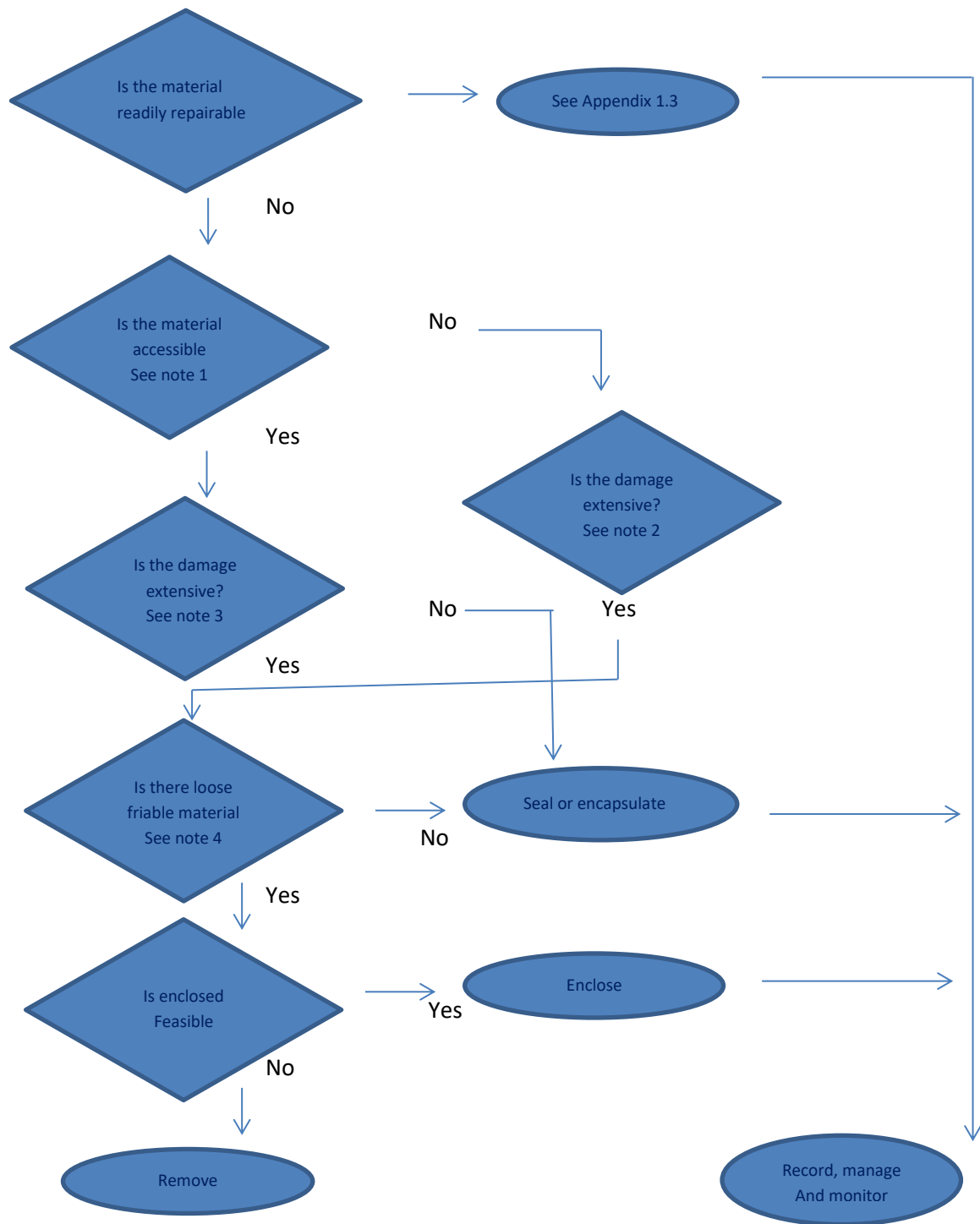
customers					
Reporting concerns to Line Manager				✓	
Participate in meetings and provide evidence for investigations as required				✓	
Ensure complaints feedback is used to improve service			✓		
Working with Head of OD & HR ensure staff have appropriate training			✓		
Ensure policy is reviewed annually or as necessary			✓		
Ensure E&D guidance is adhered to		✓			

Appendix One: Health and Safety Executive Asbestos Flowchart

1.2 Materials identified as containing asbestos



1.3 Sprayed asbestos coatings and pipe and vessel insulation in poor condition



Notes:

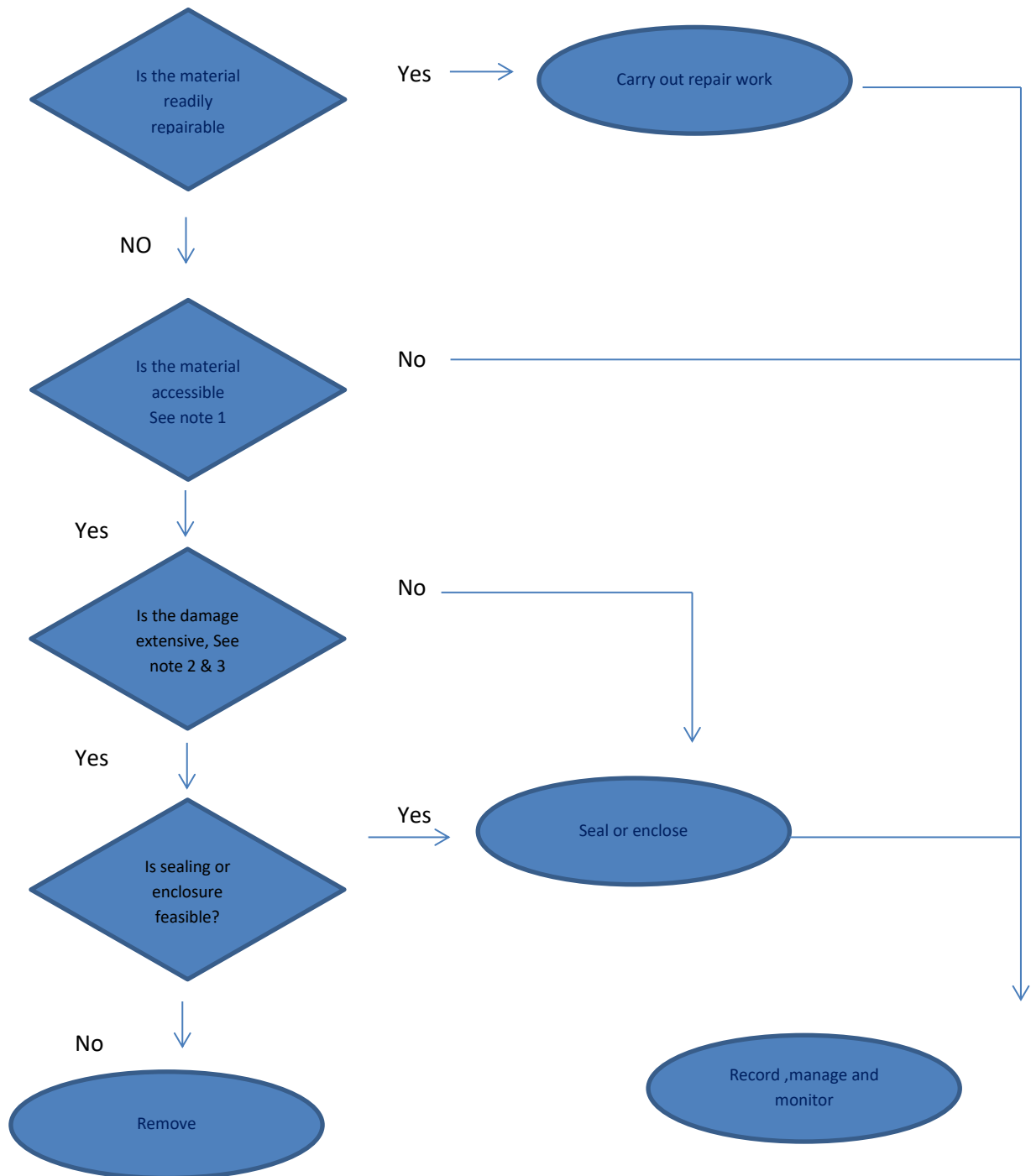
1 Is the material accessible and vulnerable to further accidental or deliberate damage from adjacent repair or maintenance, impact by people, vehicles, objects or vandalism?

2 If the damage is slight and the ACM is not easily accessible, remedial work is unlikely to be necessary. The damage should be monitored and your decision reviewed if circumstances change (e.g. the area becomes accessible)

3 If the damage is superficial, eg slight cracking to pipework insulation or deteriorated surface finish, then answer 'no' to this question. If, (e.g.) the insulation is starting to come away from the pipework or the spray coating appears to be loose in places, then answer 'yes' to this question. If there is debris on the floor or other surfaces then this will need removing following appropriate precautions.

4 The damage may be extensive, but if the material is generally sound without friable material or loose pieces, then sealing/encapsulation may be possible

1.4 AIB and insulating blocks in poor condition



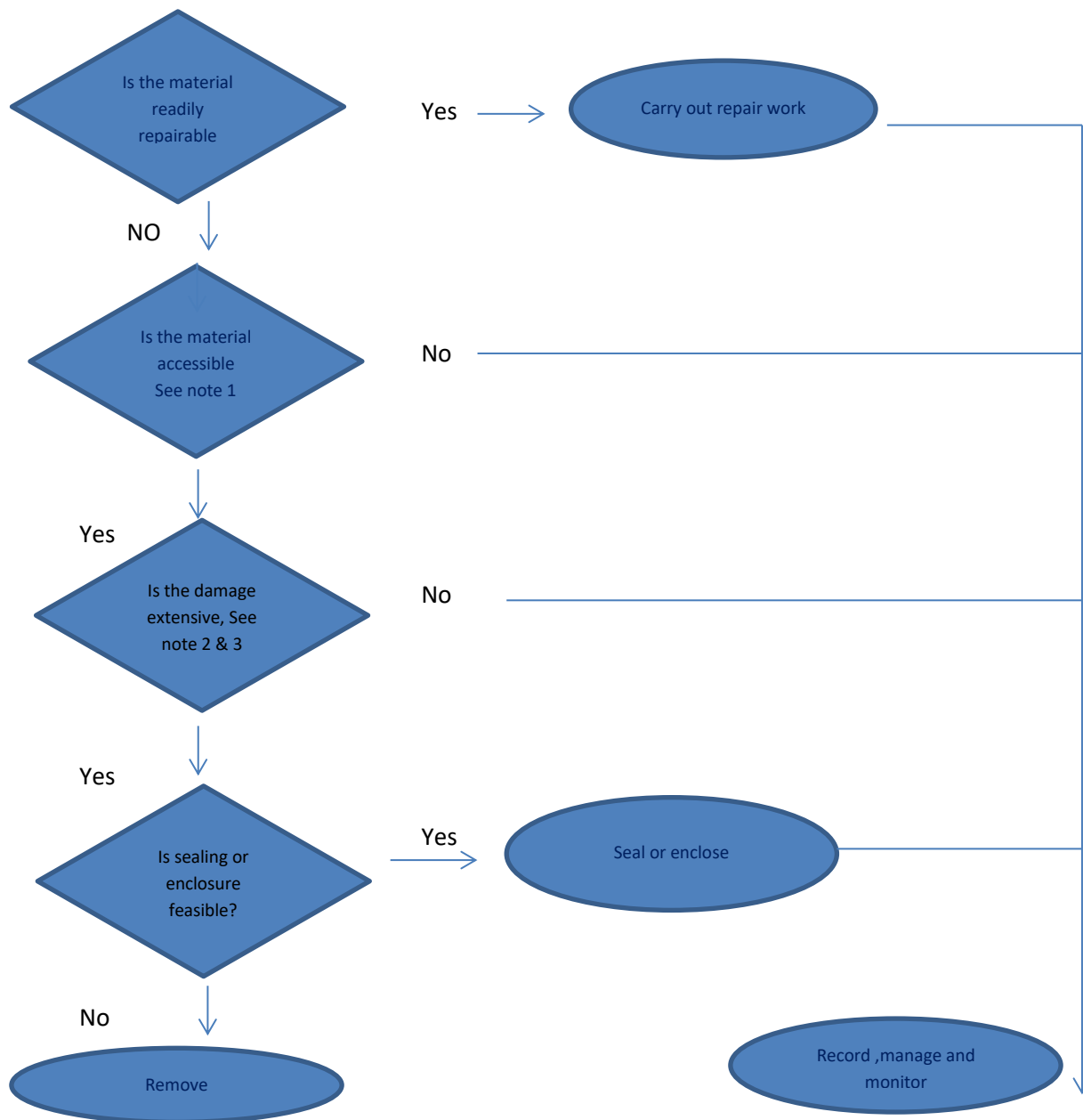
Notes:

1 Is the material accessible and vulnerable to further accidental or deliberate damage from adjacent repair or maintenance, impact by people, vehicles, objects or vandalism? If the damage is not easily accessible, remedial work may not be necessary. The damage should be monitored and your decision reviewed if circumstances change (eg the area becomes accessible).

2 If the damage is superficial, e.g. slight cracking to pipework insulation or deteriorated surface finish, answer 'no' to this question. If, for example, the insulation is starting to come away from the pipework or the spray coating appears to be loose in places, answer 'yes' to this question.

3 If there is debris on the floor or other surfaces, this will need removing following appropriate precautions

1.5 Other asbestos materials in poor condition (read Notes 1 and 2 first)



Notes:

1 This chart covers products not included in Appendices 1.2 and 1.3 such as asbestos cement, textiles, gaskets, ropes and encapsulated products such as vinyl and thermoplastic tiles, roofing felts etc. Materials which are encapsulated in a resilient matrix will have limited ability to release fibres, therefore asbestos in reinforced plastics, vinyl's, resins, rubber, mastics, bitumen, paints, flexible plasters and cements have little opportunity to release fibres unless the matrix is removed (e.g. degraded, dissolved or burnt) or subject to high levels of abrasion (e.g. use of power tools). Management of these types of materials so maintenance workers do not use abrasive methods and power tools is usually sufficient to minimise airborne asbestos releases. Sealing may be considered if there is evidence of routine wear and abrasion. The flow chart shows you the decisions to consider if remedial action is deemed to be necessary. However, unless the damage is significant or they are in a vulnerable position, urgent remedial action is unlikely to be necessary and you should simply remove these products, following the correct precautions when they come to the end of their useful life, or before refurbishment or demolition.

2 Products which are less well encapsulated (e.g. asbestos textiles and gaskets), will release fibres more readily and use of controlled work methods by maintenance workers and enclosure or sealing to prevent damage may be necessary in some circumstances.

3 Is the material accessible and vulnerable to further accidental or deliberate damage from adjacent repair or maintenance, impact by people, vehicles, objects or vandalism?

4 If the damage is slight, remedial work is unlikely to be necessary. The damage should be monitored and your decision reviewed if circumstances change (e.g. the area becomes accessible).

Appendix Two: Policy Implementation Checklist

POLICY IMPLEMENTATION CHECKLIST	
Date signed off by Project Manager	
Policy Champion	Asset Manager
Author:	
Version number:	1.0
Approved by Chief Executive on:	
Approved by EMT on:	
Approved by Management Committee on:	
Effective from:	
Due for review on:	
Diversity compliant	Yes
Equality Impact Assessment required	
Data Protection compliant	Yes
Health & Safety compliant	Yes
QL system changes made on:	
KPIs / reporting arrangements implemented on:	
Training Completed:	
Posted on G Drive:	
Posted on Loreburn H A's website:	
Audit Compliance Sub-Committee Implementation Review:	