

Asbestos Policy

Our mission is to enhance the Life Chances of residents and service users through providing great homes, first class services and working in partnership to build sustainable communities.

1 Scope

- 1.1 This Policy applies to Circle Housing Group and all Group partners. Circle Housing Group offices' are covered in the Health and Safety policy.

2 Policy

- 2.1 Circle is committed to minimising any risk to health from asbestos in its premises to employees, visitors, customers, contractors and members of the public as far as reasonably practicable.
- 2.2 This policy provides an overview and should be read in conjunction with the Asbestos Management Plan (AMP). A list of relevant legislation, approved codes of practice and guidance is detailed in [Appendix One](#).
- 2.3 This Asbestos Policy works in conjunction with the Asbestos Management Plan (AMP) and the two documents work together to show Circle's approach to managing the risk of asbestos in homes.
- 2.4 Asbestos is a naturally occurring mineral and comes in a variety of forms. It can be amphibole asbestos, which includes crocidolite (blue) and amosite (brown), or serpentine asbestos, which is chrysotile (white). These are the three main types that were used in the United Kingdom.
- 2.5 Exposure to amphibole asbestos poses a greater health hazard than exposure to chrysotile, but all types can cause asbestos-related diseases.
- 2.6 Crocidolite and amosite types of asbestos have not been imported into the UK for nearly 20 years and their use was banned in 1985. Chrysotile asbestos was prohibited from use (except for a small number of specialised uses) in 1999.
- 2.7 The Registered Providers (RPs) will take the following actions with relation to asbestos. We will:
- Take reasonable steps to locate materials in premises likely to contain



asbestos and to check their condition

- Presume that materials contain asbestos unless there is strong evidence to suppose that they do not
- Keep records of the location and condition of asbestos and presumed Asbestos Containing Materials (ACMs) and keep the record up to date
- Assess the risk of the likelihood of anyone being exposed to these materials and
- Prepare a plan to manage that risk and put it into effect to ensure that:
 - (i) any material known or presumed to contain asbestos is kept in a good state of repair, and re-inspected as defined in the AMP.
 - (ii) any material that contains or is presumed to contain asbestos is, because of the risks associated with its location or condition, repaired or if necessary removed; and
 - (iii) information on the location and condition of the material is given to anyone potentially at risk.

2.8 The presence of ACMs does not in itself constitute a danger. However, the ACM may pose a hazard if disturbed or damaged and asbestos fibres are released into the atmosphere. In the case of an unplanned incident the emergency procedures, set out in the AMP must be followed.

3 Responsibility

Duty Holder

3.1 The RPs are considered to be 'Duty Holders' as defined within [Regulation 4](#) of the Control of Asbestos Regulations 2006. The Managing Director is ultimately Duty Holder for asbestos within each RP.

3.2 Other people who are not duty holders but have information or control the premises are required to co-operate with the duty holders.

Appointed Person(s)

3.3 Each Duty Holder will identify an appointed person(s) to do all or part of the work. Where the Duty Holder appoints a separate person to carry out some or all of this work, they should ensure the individual(s) have:

- Been given the resources, skills, training and authority to ensure the ACMs are managed effectively
- Carry out surveys in accordance with recommended guidance - HSG264 Asbestos: The Survey Guide.

4 Surveying

Types of Survey

4.1 There are two types of survey available which are outlined in HSG264 *The Survey Guide*:

- Management Survey – Standard survey used to locate ACMs (as far as reasonably practicable) which could be damaged or disturbed during

normal occupancy. Will often involve minor intrusive work and some disturbance.

- Refurbishment and Demolition Survey – Needed before any refurbishment or demolition is carried out, and is specific to the scope of the intended work. It is used to locate all ACMs (as far as reasonably practicable) where refurbishment is taking place or in the whole building in the case of demolition. The survey will be fully intrusive and involve destructive inspection, as necessary, to gain access to all appropriate areas including those areas that may be difficult to reach.

Aims of Surveys

4.2 In most cases these surveys will have three aims:

- It must as far as reasonably practicable locate and record the location, extent and product type of any presumed or known ACMs
- It must inspect and record information on the accessibility, condition and surface treatment of any presumed or known ACMs
- It should determine and record the asbestos type, either by collecting representative samples of suspect materials for laboratory identification, or by making a presumption based on the product type and its appearance etc.

Action we will take (Surveys)

4.3 Each RP is required to do the following;

- Prior to any works commencing that could disturb ACMs an appropriate survey must be undertaken
- A management survey will be required during the normal occupation and use of the building to ensure continued management of the ACMs in situ
- Carry out a systemic programme of asbestos management surveys (formerly known as type 2) will be carried out in accordance with targets defined in the AMP
- Conduct a refurbishment and demolition survey (formerly type 3) will be necessary when the building (or part of it) is to be upgraded, refurbished or demolished
- Determine the type and extent of survey work to be undertaken, and commission the approved asbestos consultant
- Ensure re-inspections are carried out in accordance with the management plan.

4.4 Refurbishment surveys will be required for all work which disturbs the fabric of the building in areas where the management survey has not been intrusive. The duty holder will need to make the decision but in most cases with the help of others.

5 Asbestos Register

- 5.1 The results from the asbestos survey are held on the approved asbestos consultants (*Interserve*) database called *Amianto*. The register is continually updated by the surveying and sampling activity, and the implementation of the management plan.
- 5.2 The register contains information on the location and condition of all asbestos or materials presumed to contain asbestos within the RP's portfolios, together with the associated risk assessment.
- 5.3 Staff and contractors are able to access the register via a secure web site provided by the current contractor – *Interserve*. The survey reports can be made available both electronically and in hard copy.
- 5.4 RPs must ensure that all appropriate staff and contractors are provided with log-in and password information to enable access to the register.
- 5.5 RPs are responsible for ensuring that contractors are using the register and carry out suitable checks.

6 Risk Assessment and Prioritisation

- 6.1 Specific asbestos risk assessments, following the identification of asbestos or of materials presumed to contain asbestos, are carried out in accordance with HSG 264.
- 6.2 The risk assessment is formulated from two parts; materials risk score and priority risk score.
- 6.3 The combined score from both material and priority will determine action to be taken in accordance with the AMP. The materials risk score is provided by the Approved Asbestos Consultant (AAC) as a part of the survey. The priority risk score is provided by the RP, and a typical score is provided within the AMP.
- 6.4 The combined score will fall between 1 - 24. The RP will take the appropriate remedial action in accordance with the AMP.

7 The Duty to Manage and Share Information

- 7.1 All information and records regarding asbestos within the RP's portfolio will be maintained, updated and accessible. All relevant personnel, at every level, must be equipped with the most accurate information to ensure that they are able to identify and manage asbestos hazards during their day to day activities.
- 7.2 All information about asbestos in residents properties is kept on an asbestos Register Internet System called *Amianto* maintained by our current Approved Asbestos Consultants - *Interserve*.
- 7.3 The AAC provide an asbestos helpline should advice be required: **01332 663 001**.

8 Sharing of Information: RP and Contractor Responsibilities

- 8.1 The RP will ensure that all relevant asbestos related information is made available to staff and contractors. Residents are provided with a floor plan which indicates the location of any ACMs present.

- 8.2 Staff dealing with a responsive repair must be aware of alerts on Orchard or equivalent system, in line with the Repairs Policy. Any repairs which have the potential to disturb ACMs must be referred to the appointed person(s) before work is commissioned.
- 8.3 RPs require any contractor working on a residents home to obtain asbestos information from the asbestos register, the Duty Holder or, where not available, the asbestos helpline whilst planning work and prior to commencing work activity.
- 8.4 Contractors must immediately report any damaged asbestos and/or any suspect asbestos that may be encountered during the course of their work to both the Duty Holder and the asbestos helpline.

9 Training

- 9.1 Staff will be provided with appropriate training based upon their role and responsibilities. There are various levels of training available that are detailed within [Appendix Two](#). Where required, the duty holder can seek training advice with the Health and Safety team.

10 Repairs and Maintenance

- 10.1 Risk assessments must be carried out before any planned or reactive maintenance that has potential to disturb ACMs. For planned maintenance the RP will carry out a risk assessment as part of commissioning work(s), but in all cases the contractor is responsible to carry out the risk assessment before commencing work.
- 10.2 Planned works programmes should inform the sequence of the asbestos surveys when carrying out works on multiple homes.
- 10.3 We will procure and manage our contractors in line with the Procurement policy and the Contractor Management (Repairs and Maintenance) policy.
- 10.4 We will ensure that we inform residents about the work that is going to be carried out, any asbestos related risks that there may be, and our management and control of those risks. Where necessary we will arrange decants in conjunction with our Decants policy.

11 Asbestos Removal or Remedial Works

Asbestos removal or remedial works

- 11.1 Any requirements for asbestos removal or remedial works will be managed by the AAC. The requirement for asbestos removal or remedial works will be triggered:
- as a result of planned maintenance, demolition or refurbishment
 - when a particular material's Risk Assessment Rating reaches the level of Medium and above, or
 - where asbestos has been damaged resulting in a release of fibres.

- 11.2 Circle will only use Group-approved licensed asbestos removal contractors for removal of ACMs to ensure compliance with current legislation and associated approved codes of practice and guidance, including for the removal of non-notifiable ACMs.
- 11.3 When asbestos works have been completed, and the area thoroughly cleaned and visually inspected by the contractor, an independent United Kingdom Accreditation Service (UKAS) accredited analyst will be engaged to carry out a visual inspection and air sampling to ensure that the work area is ready for reoccupation.

12 Contractor Responsibility

Contractor Requirements

- 12.1 To successfully work with contractors it is essential that agreed programmes of work are closely monitored, with regular reports to management. Quality inspections will be regularly carried out as appropriate to ensure the highest quality work is provided that is right first time.
- 12.2 We will ensure that:
- Only suitably competent, financially viable contractors are engaged to work on our behalf.
 - All contractors are provided with all necessary information and any relevant standards and procedures with which the contractor shall be expected to comply
 - All contractors will either follow our Equality and Diversity policy or provide us with copies of their Equal Opportunity statements
 - Contractors will follow all current health, safety and environmental legislation. Contractors will provide us with copies of their own Health and Safety policy
 - Contractor performance is reviewed / audited regularly to ensure targets are met
 - Risks associated with contracts are identified and mitigated.

Asbestos-Specific Contractor Requirements

- 12.3 Asbestos contractors are responsible to ensure that:
- They are appropriately insured and licensed with the Health and Safety Executive (HSE)
 - Full quality control and monitoring is carried out
 - An asbestos risk assessment is carried out before starting work
 - Continually inform the AAC of progress and removals that have taken place.
- 12.4 All contractors will be obliged to follow our Contractors Code of Conduct
- 12.5 All contractors must meet our standards for both health and safety and equality and diversity.

13 Monitoring

- 13.1 We will monitor the implementation of our Asbestos Management Plan.
- 13.2 We will ensure that full quality control and monitoring is carried out on works carried out on resident homes, in line with our Contractor Management policy, and in partnership with the AAC.
- 13.3 If a resident or member of staff is exposed to asbestos a record will be kept on file and kept for the duration of 40 years. All data held will be subject to the Data Protection policy.

14 Emergency Plan

- 14.1 The aim is always to put in place all possible plans and preventative measures to avoid an emergency. However, if an emergency situation should arise each RP will implement the action plan held locally.

15 Equality and Diversity

- 15.1 Circle will treat all customers and staff with fairness and respect. We value diversity and work to promote equality and tackle unlawful discrimination.
- 15.2 We are committed to supporting customers and staff access information in a way that suits individual needs. Please get in touch with your local office to discuss this.

Glossary

| Term | Definition |
|----------------------|---|
| AAC | Approved Asbestos Consultant |
| ACM | Asbestos Containing Material |
| ACoP | Approved Codes of Practice |
| Asbestos | A natural material that is made of tiny fibres. Exposure to Asbestos fibres can cause several serious diseases, including cancer |
| Asbestos Helpline | Provided by the AAC – Interserve - 01332 663 001 |
| AMP | Asbestos Management Plan – required by legislation, a document that provides the procedure to work in conjunction with the policy |
| Appointed Person | Person(s) appointed to take overall responsibility for achieving effective asbestos management within an RP |
| BOHS | British Occupational Hygiene Society |
| CAR | Control of Asbestos Regulations |
| Duty Holder | Regulation 4 places a duty on all parties who have, by virtue of any contract or tenancy agreement, an obligation of any extent in relation to the maintenance or repair of premises or of access or egress to premises. These parties might include owners of buildings, tenants, managing agents, etc. It is intended that the existing contractual arrangements for dealing with building related matters should be reflected in respect of the duty to manage Asbestos. |
| HSE | Health and Safety Executive - HSE is the national independent watchdog for work-related health, safety and illness. |
| HSG264 | On 29th January 2010 the HSE released HSG 264 Asbestos: The Survey Guide. This document expands on and replaces MDHS 100. This document is aimed at those conducting Surveys, those who commission surveys and those with specific responsibilities for managing Asbestos in accordance with Control of Asbestos Regulations (CAR) 2006. |
| Interserve / Amianto | Interserve - Current approved Asbestos consultant – Amianto - System used by Interserve for data storage |
| MDHS | Methods for the Determination of Hazardous Substances |
| Orchard | Circle system for storing Asbestos data as well as other asset management data. |

Appendix One

Legislation, ACoPs and Guidance

The Health and Safety at Work etc. Act 1974

The Control of Asbestos Regulations 2006

The Management of Health & Safety at Work Regulations 1999

The Construction (Design & Management) Regulations 2007

Approved Code of Practice L127 The Management of Asbestos in Non-Domestic Premises – Regulation 4 of the Control of Asbestos Regulations 2006

Approved Code of Practice L143 Work with Materials Containing Asbestos – The Control of Asbestos Regulation 2006

HSG 264: The Survey Guide

Appendix Two

| Training | Definition |
|--|--|
| E-learning | Mandatory for all staff who have a role/involvement in managing asbestos. |
| Asbestos Awareness | Mandatory for general Maintenance staff and customer services officers dealing with maintenance queries. |
| Asbestos Policy and AMP Awareness Training | Mandatory (following review) for all staff involved in the management of Asbestos |
| Non-licensed Asbestos | Mandatory for all DLO / trade staff working with non-licensed Asbestos. |
| BOHS Qualification | Mandatory for Nominated Person(s) for each RP. |
| BOHS Asbestos 402 | Provides the trainee with skills for building surveys and bulk sampling proficiency. Is the minimum recognised qualification required to undertake Asbestos surveys. |
| BOHS Asbestos 405 | Provides the trainee with skills to manage Asbestos in buildings and a knowledge base to audit Asbestos removal projects |
| BOHS Asbestos 406 | Provides the trainee with practical skills to be able to act as supervisory license holder during an Asbestos removal project. |