



Property Management

Asbestos Policy

Scope:	This policy applies to Circle 33 Housing Trust, Commercial Services Circle Anglia, EPIC Trust, Mole Valley Housing Association, Old Ford Housing Association, Roddons Housing Association, Russet Homes, South Anglia Housing, Wherry Housing Association
Effective Date:	September 2008
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Signed Off :	Group Policy Forum 21 st August 2008
Author:	Abi Patience, Policy Officer Vince Warren, Group Asset Manager
Policy Owned by:	Policy and Planning Asset Management
KLOE:	Stock Investment and Asset Management
QAF (Supported Housing):	C1.2 Security, Health and Safety
Statute:	The Health and Safety at Work Etc Act 1974 Workplace (Health and Safety and Welfare) Regulations 1992 The Construction (Design & Management) Regulations 2007 The Management of Health and Safety at Work Regulations 1999 The Control of Asbestos Regulations 2006
Regulatory Code:	3.4

Asbestos

1 Scope

1.1 This policy applies to:

- Circle Anglia
- Circle 33 Housing Trust
- Commercial Services Circle Anglia
- EPIC Trust
- Mole Valley Housing Association
- Old Ford Housing Association
- Roddons Housing Association
- Russet Homes
- South Anglia Housing
- Wherry Housing Association

1.2 This policy is complemented by an Asbestos Management Plan, as required by legislation, which details procedures for management of asbestos.

2 Policy Statement

2.1 The dangers of exposure to asbestos are well documented. Asbestos fibres and dust are potentially very dangerous if inhaled, when they can cause serious lung diseases including cancer. The symptoms of these diseases often do not appear for between 20 -30 years after exposure to asbestos.

2.2 Circle Anglia is committed to minimising any risk to health from asbestos in its premises. We will at all times comply with the following legislation and guidance in our management of asbestos materials:

- The Control of Asbestos Regulations 2006
- The Health and Safety at Work etc. Act 1974
- The Management of Health & Safety at Work Regulations 1999
- The Construction (Design & Management) Regulations 2007
- MDHS100 Methods for the Determination of Hazardous Substances – Surveying, Sampling and assessment of Asbestos Containing Materials
- 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 Regulations 2006

3 Policy

- 3.1 Circle Anglia in recognition of its duties under the Health and Safety at Work Act 1974 and the Control of Asbestos Regulations 2006 towards its employees, visitors, customers, contractors and members of the public, undertakes to manage all Asbestos Containing Materials responsibly, so far as is reasonably practical.
- 3.2 Circle Anglia will deal with the risks presented by the three most commonly used types of asbestos equally:
- Crocidolite (blue)
 - Amosite (brown) and
 - Chrysotile (white) asbestos
- 3.3 The presence of an Asbestos Containing Material (ACM) does not in itself constitute a danger. However, the ACM may pose a hazard if disturbed or damaged and must be treated accordingly, in line with the Control of Asbestos Regulations 2006. In the case of an emergency we will follow the emergency procedures set out in the Asbestos Management Plan.
- 3.4 All materials within the Circle Anglia property portfolio must be presumed to contain asbestos and treated accordingly unless, or until, adequate information is received to the contrary.
- 3.5 Asbestos materials which are sound, undamaged and not releasing fibres should **not** be disturbed. We will monitor their condition on a regular basis.
- 3.6 Circle Anglia and the partner RSLs are shared 'Duty Holders' as defined within Regulation 4 of the Control of Asbestos Regulations 2006. As Duty Holders, we have responsibility to:
- **Take reasonable steps to locate and identify** Asbestos Containing Materials (ACMs) in our assets (see [the duty to locate and identify ACMs](#)).
 - **Ensure that all asbestos related information is issued** to all organisations and persons who may potentially disturb ACMs during their activities working on Circle Anglia's assets, and any other relevant persons (see [the duty to manage and share information](#)).
 - **Produce, implement and review at regular intervals an Asbestos Management Plan** detailing roles and responsibilities, survey

targets, risk assessments, and works procedures (see [the duty to implement and regularly review a management plan](#)).

- **Monitor the implementation of the Asbestos Management Plan** to ensure that working arrangements and provisions of financial, technical, human and other resources are suitable and sufficient to meet its requirements (see [Monitoring](#)).
- **Train all personnel**, where required, to ensure that they are competent to fulfil the requirements of their roles and responsibilities, including ensuring that all personnel, including subcontractors, residents and visitors, are aware of the contents of the Asbestos Management Plan and are fully informed of any potential asbestos hazards in the areas they live or work and visit (see [Training](#)).

4 The duty to locate and identify Asbestos Containing Materials

Surveying

4.1 The purpose of an asbestos survey is to:

- so far as is reasonably practicable, identify and record the location, extent and product type of any presumed or known Asbestos Containing Materials (ACMs)
- inspect and record information on the accessibility, condition and surface treatment of any presumed or known ACMs
- carry out a risk assessment to determine further action required

4.2 Annual targets have been set which will lead to the collection of surveys on 100% of all general needs, key-worker, housing for older people, and supported housing properties by the financial year 2012/13. Properties built after 1999 will not be surveyed as it was illegal by this point to use asbestos in construction.

4.3 Only suitably qualified and insured surveyors will carry out asbestos surveys. We require an Approved Asbestos Consultant to carry out the surveys on all group properties. Further details about the Approved Asbestos Consultant can be found in the [Asbestos Management Plan](#).

4.4 They will employ three types of survey, as set out in MDHS 100, but the main type of survey used will be a Type 2 survey.

- **Type 1:** All areas of a building are inspected - if any areas are not accessible they must be presumed to contain asbestos. Any materials which can be reasonably expected to contain asbestos must be presumed to do so.
- **Type 2:** This survey builds on a Type 1 survey by taking representative samples for analysis to confirm or refute the presence of ACMs. This type of survey is less likely to overestimate the ACMs

present in a building and will therefore reduce the burden of subsequent management activities (regular condition monitoring and repair, sampling and analysis prior to work disturbing the material).

- **Type 3:** This is carried out prior to demolition or major refurbishment. All areas of the building must be accessed - this may involve destructive inspection. This type of survey is not concerned with the condition of the ACMs as these will be removed as part of the subsequent demolition.

4.5 Circle Anglia is responsible for ensuring that material reviews and re-inspections are carried out regularly. RSLs may choose to carry these out in-house where staff are appropriately trained, or to instruct the AAC accordingly.

Risk Assessment and Prioritisation

4.6 Surveys will provide information about asbestos in a property, including a risk score for known asbestos based on a material assessment and a priority assessment of risk.

4.7 We will take action to deal with the asbestos based on the risk rating. Very high risk will lead to restricted access to the affected area and immediate removal – where necessary residents will be decanted during works. Where risk is low no immediate action is needed, but management should be ongoing. Details of appropriate action according to risk is set out in the management plan.

4.8 This information will feed into the planned maintenance programme of each RSL.

5 The duty to manage and share information

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

5.2 All information about asbestos in our properties is kept on an Asbestos Register Internet System (ARIS) <http://asbestos.interserveis.co.uk>, maintained by our Approved Asbestos Consultants. This register can be accessed by all our contractors, as well as staff working directly for Circle Anglia.

5.3 There is also an asbestos helpline available: **0800 634 2237**.

Sharing of information: RSL and Contractor responsibilities

- 5.4 When drawing up specifications for any development, planned or reactive maintenance works, Circle Anglia will take all reasonable precautions to determine whether asbestos is present, including consulting the Duty Holder or the Asbestos Register Internet System.
- 5.5 Staff dealing with a responsive repair must be aware of alerts on Orchard or equivalent system about asbestos, in line with the Repairs policy. Any repairs which have any potential to disturb Asbestos Containing Materials must be referred to the Property team.
- 5.6 Circle Anglia requires any contractor working on its premises to obtain asbestos information from the Duty Holder or, where not available, the asbestos helpline (0800 634 2237), whilst planning work and prior to commencing work activity.
- 5.7 Contractors must report immediately any damaged existing asbestos and/or any further suspect asbestos discovered during the course of their work to both the Duty Holder and the asbestos helpline (0800 634 2237). No person, whilst carrying out normal work activities, shall knowingly undertake any work involving known or suspected asbestos.

Training

- 5.8 All personnel liable to disturb asbestos while carrying out their normal everyday work, as well as those who may influence how work is carried out should be given formal Asbestos Awareness Training. This is a mandatory requirement. For Circle Anglia this will primarily apply to front line staff in the different RSLs.
- 5.9 Where appropriate more specialist training will also be provided.

6 The duty to implement and regularly review a Management Plan

- 6.1 The group Asbestos Management Plan provides clear and relevant information and guidance to ensure the most effective management of Asbestos Containing Materials.
- 6.2 It sets out roles and responsibilities across the group, providing guidance on:
- risk assessments
 - surveys
 - removal of asbestos

- repairs and maintenance
- training
- emergencies

6.3 Individual RSLs are responsible for the implementation for the Management Plan across their stock.

6.4 The Plan will be regularly reviewed, at least every two years, or more often if there is a significant incident or change of policy or procedures.

7 Repairs and Maintenance

7.1 Risk assessments must be carried out before any planned or reactive maintenance that has the potential to disturb ACMs. For planned maintenance the RSL will carry out a risk assessment as part of commissioning the work, but in all cases the contractor is responsible to carry out a risk assessment before commencing work, in line with Regulation 3 of the Management of Health and Safety at Work Regulations 1999.

7.2 We will procure and manage our contractors in line with the Procurement policy and the Contractor Management (Repairs and Maintenance) policy.

7.3 We will ensure that we inform residents fully 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 a decant for the resident.

Asbestos removal or remedial works

7.4 Any requirements for asbestos removal or remedial works will be managed by the Approved Asbestos Consultant. 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.

7.5 Circle Anglia will only use 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.

7.6 When asbestos works have been completed, and the area thoroughly cleaned and visually inspected by the contractor, an independent 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.

Contractor Responsibilities

7.7 Contractors are responsible to ensure that:

- They have and implement robust health and safety policies and working practices
- All their operatives are fully trained and licensed to carry out the work they are required to do
- They are appropriately insured and licensed with the HSE
- Full quality control and monitoring is carried out
- An asbestos risk assessment is carried out before starting work

7.8 All contractors will be obliged to follow our Contractors' Code of Conduct

7.9 All contractors must meet our standards for both Health and Safety and Equality and Diversity.

7.10 We require contractors to share any information they gain about asbestos with us, such as suspected locations of asbestos within properties.

8 Service Standards

8.1 We will fully comply with our duties as social landlords set out in legislation in order to ensure the safety of our customers and staff.

8.2 All contractors will adhere to our Contractors' Code of Conduct.

9 Monitoring

9.1 We will actively monitor the implementation of our Asbestos Management plan. At an RSL level this will be through the local Action Plan.

9.2 We will ensure that full quality control and monitoring is carried out on works done to our properties, in line with our Contractor Management policy, and in partnership with the Approved Asbestos Consultants.

10 Equality and Diversity

10.1 It is essential to recognise that customers of all races, ages, religions, gender, sexual orientation, literacy levels and disability should be treated equally and fairly.

- 10.2 All customers will have access to this document upon request or from our website www.circleanglia.org/customers
- 10.3 This document and accompanying leaflet can be translated or provided in alternative formats (e.g. Braille, large print, audio) upon request.
- 10.4 Equality and Diversity training is mandatory for all staff.

11 Publicising the Policy

- 11.1 Circle Anglia publicises its policy on asbestos to residents and staff in a number of ways:
- Resident Handbook
 - Leaflets
 - Resident Newsletter
 - Resident Website
 - CIRANO
 - Policy Briefings and
 - Training

Glossary

Term	Definition
Asbestos	A natural material that is made of tiny fibers. Asbestos can cause several serious diseases, including cancer
AAC	Approved Asbestos Consultant
ACM	Asbestos Containing Material
MDHS	Methods for the Determination of Hazardous Substances

Related Documents

Document	Link
Connected Policies:	Asset Management Strategy Repairs Procurement Property Alterations and Improvements Contractor Management (Repairs and Maintenance)
Forms and Letters:	N/A
Leaflets:	Asbestos Contractors' Code of Conduct
Other:	

Version history

Version no.	1	Date effective:	October 2006
Full / partial review?	n/a		
Brief summary of changes:	n/a		
Staff consultation (teams):	SMPRG, Staff		
Resident consultation:	OF HS, OF TML		
Signed off by:	Group Policy Forum, 15 th September 2006		
Author:	Jason Christensen, Policy Officer		

Version no.	2	Date effective:	September 2008
Full / partial review?	Full		
Brief summary of changes:	Inclusion of new business partners, full re-write, association with new asbestos management plan, compliance with Asbestos regulations 2006.		
Staff consultation (teams):	Central Asset Management Team C33 Property Team Heads of Continuous Improvement Health and Safety Mole Valley staff via Glynis Gatenby Old Ford Property Team Roddons Property Team Russet staff via Lesley Hardwick Procurement South Anglia property Support Initiatives Wherry Property Team		
Resident consultation:	Mole Valley Resident's Policy Group		
Other consultation:	Interserve Frankhams		
Signed off by:			
Author:	Abi Patience, Policy Officer Vince Warren, Group Asset Manager		

Version no.	3	Date effective:	
Full / partial review?			
Brief summary of changes:			
Staff consultation (teams):			
Resident consultation:			
Signed off by:			

Author:	
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