



## Asbestos Management Policy

<b>Policy Name:</b>	Asbestos Management Policy
<b>Status:</b>	APPROVED
<b>Approved by:</b>	Great Places Panel and Tenant Committee
<b>Drafted by:</b>	Victoria Finn – Asbestos Policy Lead
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<b>Customer consultation:</b>	Property Panel and Tenant Committee
<b>Next Review Date:</b>	May 2023

## **1. BACKGROUND**

- 1.1** Wythenshawe Community Housing Group (The Group) takes its role as a Landlord and employer very seriously. This policy along with supporting procedures, register and plans, clearly sets out a framework of how the Group will plan, respond and effectively manage asbestos within the assets and stock.
- 1.2** Asbestos presents a hidden hazard, as its fibres are so small that they can be invisible. These very small fibres of respirable size can easily be breathed in, penetrating deep into the lungs to cause serious damage. Asbestos has been used within buildings throughout the 1900's until it was banned in the United Kingdom on the 24th November 1999.
- 1.3** It has exceptional qualities as a tough, durable product with good fire, chemical and acoustic resistance properties and is often found in many areas, some of which are listed below:
- Textured coatings (ceilings, walls etc.)
  - Meter cupboard housing. E.g. (Insulation panelling's)
  - Roofing tiles, felt, guttering.
  - Linings for walls, ceilings, doors and heating ducts.
  - Heat resistant panels for doors, stairways, ceilings, chutes.
  - Thermal insulating panels and boards.
  - Flooring materials. E.g.: (Floor tiles, Adhesives, Linoleum)
  - Infill panels, fascias, gas fire surrounds, sprayed application to steel work, boiler houses for thermal insulation, pipe lagging and fire protection.

## **2. POLICY STATEMENT**

- 2.1** The Group will act as the legal duty holder with respect to CAR 2012 Regulation 4 – points 1 to 11. The Group's assets are divided into two specific groups to ensure consistency with the regulations, as follows: -

### **2.2 NON-DOMESTIC PREMISES AND COMMON AREAS**

- 2.3** Regulation 4 (Duty to manage asbestos in non-domestic premises) of The Control of Asbestos Regulations 2012 (CAR 2012) places a legal duty on the Group as the 'Duty Holder' to manage asbestos in all of its non-domestic properties of which there are 338, (as at February 2021) to include offices, community buildings, communal areas of multi-story blocks and communal areas of walk-ups/cottage flats. This covers those properties that the Group manages, controls or occupies and where it has maintenance and repair responsibilities.

**2.4** In summary, the requirements placed upon the Group are as follows: -

- Identifying asbestos containing materials within the premises and assessing its condition. (CAR 2012 – Reg 5).
- Presuming materials contain asbestos unless there is strong evidence that they do not.
- Maintaining an up to date record of the location and condition of the asbestos containing materials to be managed.
- Assessing the risk of the likelihood of anyone being exposed to fibres from these materials.
- Preparing an Asbestos Management Plan (AMP) setting out how the risks from the materials are to be managed, take the necessary steps to implement the plan and review and monitor the plan periodically (as a minimum, every 12 months).
- Providing information on the location and condition of asbestos containing materials to anyone liable to work on or disturb them. To include risk assessments and method statements, plans of work with suitable and sufficient information, instruction and training as part of ongoing asbestos awareness.

## **2.5 DOMESTIC PREMISES**

It is not a requirement of CAR2012 to monitor asbestos in domestic properties. The Group will however apply a risk-based approach to monitoring in domestic homes to support our data strategy and general H&S responsibilities, defined as: -

- Routinely checking condition of affected materials prior to any repairs or re- letting a empty home.
- Targeting 500 domestic homes per annum with a survey between 2022 and 2025 to strengthen our data and stock intelligence
- Annual lettering of all properties with known or presumed asbestos content providing details of material and locations, including general tenant guidance.
- Reinspection of material with a medium or high risk rating (combined material and priority assessment rating of 14 or higher) at intervals determined by the Consultant Asbestos Management Surveyor at a four-year maximum interval.

### **3. REGULATIONS AND GROUP COMMITMENTS**

#### **3.1 Data collection and sharing**

#### **3.2 The Group will:**

- Locate and identify all possible and potential locations of asbestos containing materials.
- Maintain a computer database to store, in a readily accessible form, survey data, risk assessments and other relevant data to assist persons managing the Group's buildings (day to day activities plus repair, maintenance and building modification works) in order to carry out responsibilities under Health and Safety legislation to protect staff and visitors from risks to health.
- Carry out regular and effective risk assessments of the asbestos containing materials in non-domestic locations to determine whether remedial action is necessary.
- Apply a risk-based approach to management and monitoring of asbestos in domestic locations, with reinspection of a materials with a medium or high-risk rating (combined material and priority assessment rating of 14 or higher) at intervals determined by the Consultant Asbestos Management Surveyor at a four-year maximum interval.
- Have in place an asbestos management plan to cover communal areas of domestic flats and all commercial assets, as mentioned under CAR 2012 regulation 4 for scrutiny by contractors, colleagues and building users.
- Share all asbestos related information held on a premise owned by the Group with contractors and staff and undertake further surveys on request as required.
- Ensure that 'warnings' show against the property when booking work on the system for operatives and staff to view.
- Share asbestos information with residents regularly where work will impact on them and make alternative arrangements for temporary accommodation during work if required.
- Check customer profile and vulnerability information to ensure that appropriate support is provided to vulnerable customers with whom we are sharing asbestos information on an annual basis.

#### **3.3 Accredited consultants and contractors**

**3.4** All surveys will be carried out in accordance with the latest guidance HSG 264 by qualified external consultants, in contract with the Group. Asbestos removal works will be undertaken by approved, qualified HSE licensed asbestos removal contractors (LARC); and suitable and relevantly qualified consultants. The Group will review the contractors' status and qualifications prior to awarding the contract or extending contract dates, and annually within the contract period, which will be undertaken by the Asbestos Policy lead identified in the separate sheet

**Appendix A.** The P405 qualified staff identified in this list will be assigned by the Investment Manager to project manage any major works involving asbestos removal within the Group.

### **3.5 WCHG Asbestos Management**

- 3.6** The Group's managers/team leaders will assist in the overall management of asbestos on a day to day basis and there will be a number of staff identified in **Appendix A** who will be the first point of contact in their own team when ordering any asbestos related surveys or removals via the contractors dedicated e-mail address, and the 24-hour telephone numbers provided. This will ensure the Group have qualified and experienced staff in place to manage this policy.
- 3.7** An asbestos management system will be kept, which will contain detailed information of all incidences of asbestos materials sampled and actions required or taken in accordance with the material and priority scoring parameters as defined in the HSG 264.
- 3.8** The P405 qualified Facilities Manager will monitor asbestos management plans for each Non-domestic premise (communal/office areas) which will be made readily available for maintenance operatives visiting the buildings before work commences.
- 3.9** A named policy lead will be identified to ensure regular monitoring of the Group's compliance and maintain an evidence file for auditing purposes (Refer to **Appendix A** 'P405 qualified staff').
- 3.10** A process chart is available for colleagues to follow which is available in the public folder and via the intranet entitled 'Asbestos work process guide' **Appendix B** which will be reviewed regularly every 6 to 12 months by the policy lead.
- 3.11** Periodic training is provided for the asbestos management colleagues scheduled in **Appendix A** 'P405 qualified staff' list and annual asbestos awareness training will be provided to colleagues in front line roles for the Group, in addition to which all Property colleagues will have training once every two years, via a reputable external classroom lead awareness provider.
- 3.12** The Group will have in place an annual budget specific for Asbestos related works and surveying activity to ensure suitable and sufficient resources are always in place and detailed analysis can be undertaken of demand.



## **4. ACTION ON DISCOVERING ASBESTOS**

### **4.1 If asbestos is discovered**

**4.2** If any person working in an area suspects a material may contain asbestos, the work will cease immediately (to prevent a possible release of fibres into the air) and one of the P405 qualified colleagues listed in **Appendix A** or the colleague's line manager must be contacted immediately.

**4.3** Effective management of asbestos is the responsibility of all frontline staff and requires the initiating officer and their manager or team leader, to adopt the procedure detailed in the process guide in **Appendix B**, taking full ownership of the survey arrangement or removal activities that need to be undertaken by consultants and contractors in their work area. This includes liaising effectively with the Coordinators of the responsible team and seeking support where required from the P405 trained managers and Policy Lead detailed in **Appendix A**.

### **4.4 Actions to be taken following a release of known asbestos**

**4.5** If there has been a release of asbestos fibres, the qualified personnel or manager will inform the Health and Safety manager who will, under CAR 2012 – Reg 15 and 16;

- Report the suspected release to the Health and Safety Executive (HSE) as a dangerous occurrence as specified in the Reporting of Incidents, Diseases and Dangerous Occurrences Regulations (RIDDOR);
- Carry out a full investigation of the incident and circumstances surrounding it or appoint appropriate party to undertake one.
- Ensure that an Accident Report is completed, for each person who may have been exposed;
- On receipt of the completed RIDDOR response from the HSE, check it for accuracy.
- Ensure that all associated reports and documents are maintained for subsequent investigations and actions.
- A licensed asbestos contractor and UKAS accredited laboratory would be engaged to deal with any asbestos related remediation/removal.

**4.6** The Group's Incident and Escalation Process should also be adopted and followed immediately.

**4.7** The Group has in place a separate procedure for managing Asbestos information out of hours to enable notification of Asbestos records to operatives out of office operating hours. This procedure also covers actions to take in the event of an Asbestos incident out of hours.

## **5. MEDICAL RECORDS**

- 5.1** Health records will be kept for every Group colleague who is exposed to asbestos above the Control Limit (CAR 2012 – Reg 2:- 0.1 fibres per cubic centimetre / fibres per millilitre, of air averaged over a continuous period of 4 hours). These records, or a copy of them, must be kept in a suitable form for at least 40 years from the last entry. The colleague will also be advised to inform their GP to make an entry on their personal medical records. Health records and access to records will be managed in accordance with data protection and the Groups Attendance Management Policy.

## **6. EXTERNAL CONTRACTORS COMPETENCE**

- 6.1** All external asbestos contractors deployed by the Group will be able to provide the following:


- Proof of the company and/or relevant employees having gained the relevant qualifications/accreditation.
- Evidence of method statements and risk assessments of asbestos related works or Promaster loader sheets to be used which has a built-in algorithm.
- Assurances from the contractor relating to testing of equipment used by operatives working with asbestos such as H type filtration vacuums, which would include DOP test certificates at 6 monthly intervals.
- Assurances that face fit tests are carried out regularly for operatives who work with asbestos materials.

- 6.2** The competencies of the external contractors and consultants will be reviewed formally every 2 years by the Asbestos Policy Lead.

## **7. EQUALITY & DIVERSITY**

- 7.1** The Group will ensure that the Data Protection Policy is accessible to its diverse customers and will take into account the different needs of customers when explaining the options available to them and in tailoring the service around customer need.

- 7.2** The Group has a responsibility to serve the needs and promote the interests of its entire staff and all its customers/service users. The Group's Single Equality Scheme works towards developing services, facilities and working practices, which are equally accessible and non-discriminatory for all its customers. This is irrespective of their gender, gender reassignment, age, race, sexuality, disability, religion, marital status/civil partnerships, pregnancy/maternity and economic status, and in line with the nine protected characteristics part of the new legislation under Equality Act 2010.

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- 7.3** A key element of the Equality standards involves carrying out an Equality Impact Analysis on all existing and, in particular, new policies to ensure there is no adverse impact or promotion of any form of discrimination to particular groups or associated protected characteristics. An Equality Impact Analysis has been carried out to this policy and will be reviewed on an annual basis.
- 7.4** We will provide information in languages other than English, in Braille, Large Print and Audio format. Our reception and interview rooms are fitted with a hearing loop system and the use of mobile loop systems.
- 7.5** The Group will ensure a plain English asbestos guidance leaflet is available and sent to all its properties and will ensure that data held on asbestos within domestic properties is shared with customers on a bi-annual basis and at the point of first let.

## **8.0 RELATED POLICIES**

- Health and Safety Policy
- Incident Escalation Policy
- Asset Management Strategy/Plan
- Contractor Code of Conduct
- Contractor Compliance Manual
- Empty Homes Policy
- Responsive Repairs Policy



## ASBESTOS APPENDIX A P405 Qualified Staff

Victoria Finn – ( <b>Policy Lead</b> ) Development and Investment, Projects Manager Victoria.finn@wchg.org.uk	Phone 0161 946 6357
Robert MacDougall – Development and Investment, Property services manager. Robert.macdougall@wchg.org.uk	Phone 0161 946 9516
Alyson Balme- Investment Project Manager Alyson.balme@wchg.org.uk	Phone 0161 946 9572
Tom Jones – Health and Safety Manager Tom.jones@wchg.org.uk	Phone 0161 946 6371
Kevin Rosevere – Investment Projects Manager Kevin.rosevere@wchg.org.uk	Phone 0161 946 6360
James Garner – Development Project Manager James.garner@wchg.org.uk	Phone 0161 946 9158
Lynsey Davies – Investment Project Surveyor Lynsey.davies@wchg.org.uk	Phone 0161 946 9598
Linda Reardon – Development Project Surveyor Linda.reardon@wchg.org.uk	Phone 0161 946 9593
Helen Piwko— Property Services Team Leader Helen.piwko@wchg.org.uk	Phone 0161 946 6383
Jimmy Singh- Voids Team Contracts manager Jimmi.singh@wchg.org.uk	Phone 0161 946 6384
Diane Burrell – Property Services Facilities Manager Diane.burrell@wchg.org.uk	Phone: 0161 946 2191
Carl Burgess – Property Services Senior Contract Manager (Planned) Carl.burgess@wchg.org.uk	Phone 0161 946 9151
Pete Leonard – Property Services Team Leader Pete.leonard@wchg.org.uk	Phone 0161 946 9599
Alex Welsby – Environment Team, Team Leader Alex.welsby@wchg.org.uk	Phone 0161 946 9181
Alan Harris – Environment Team, Team Leader Alan.harris@wchg.org.uk	Phone 0161 946 2188
All queries, request for surveys or requests for removals to the asbestos inbox	<a href="mailto:asbestos@wchg.org.uk">asbestos@wchg.org.uk</a>
Out of Hours Contact number (Assure 24)	0300 1110000 <b>(Refer to Duty Manager)</b>

**The Asbestos inbox will be monitored by the asbestos lead for enquiries that cannot be assigned to a team and each team has a coordinator to deal with their own surveys and removals. Mobile phone numbers for the above are also available through the Group's intranet for immediate contact and escalation.**

**Asbestos Work Process Guide**

