



CALEDONIA GROUP ASBESTOS POLICY & MANAGEMENT PLAN

POLICY IMPLEMENTATION CHECKLIST	
Policy Guardian:	Director of Assets
Author:	Director of Assets
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Diversity compliant:	Yes
Equality Impact Assessment required:	No
Data Protection compliant:	Yes
Health & Safety compliant:	Yes
Procedure implemented:	
QL system changes made:	N/a
KPIs / reporting arrangements implemented:	Yes
Training Completed:	
Posted on intranet:	Yes
Posted on website:	Yes
Publicity material issued:	N/A
Business Services – Implementation Review:	

1. INTRODUCTION

It is Group policy to comply with the Control of Asbestos Regulations 2012 and all other relevant related Health & Safety legislation to ensure that, wherever possible, tenants, staff, members of the public and contractors employed by the Associations in the Group are not exposed to asbestos fibres through living in, visiting or working in any of the Group's properties.

2. SUMMARY OF PROCEDURES

Responsible Person

The Director of Assets is responsible for the co-ordination and management of the presumed Asbestos Containing Materials (ACMs) within all stock in the Group.

Property Audit

Each Group company will maintain an Asbestos Register, detailing all properties which may have components containing asbestos. Examples of properties containing asbestos include:

- (i) Older properties built prior to 1980's e.g. conversion / refurbishment developments, which could incorporate asbestos in the following:
 - Fire protection in the form of sprayed coatings, gaskets, seals etc.
 - Insulating boards.
 - Bituminous roofing materials.
 - Cement panels to eaves, stairs, pipe boxing etc.
 - Thermal insulation to storage heaters
 - Artex coatings.
- (ii) Newer properties, built in the 1980's and 1990's, which could incorporate asbestos in the following:
 - Bonded gaskets and seals to pipework etc.
 - Cement panels to eaves, stairs, pipe boxing etc.
 - Thermal insulation to storage heaters.
 - Artex coatings.

Property Surveys

Stock Condition Surveys will be carried out by the Associations on a periodic basis. These surveys should identify any possible Asbestos Containing Materials (ACMs) present.

All properties identified as potentially having ACMs will be surveyed by an accredited company, who will prepare a report stating the following:

- (i) The location, nature and extent of any asbestos found.
- (ii) The potential risk of exposure to asbestos fibres to tenants, staff, members of the public and contractors employed the Associations.
- (iii) Any remedial or protective works which require to be undertaken to eliminate or minimise potential exposure to asbestos fibres.

- (iv) The nature and frequency of ongoing inspections required to monitor the condition of any asbestos identified.

Management Plan

On receipt of survey reports the Associations will prepare a Management Plan for carrying out all works recommended in these reports. This action plan will identify all works required to be carried out at each development and the timescales in which the work will be carried out.

The necessary works will be added to the Associations' 5 year planned maintenance and major repair programmes.

Recording of Information

Where surveys have identified that asbestos is present within buildings, this information will be added to the Associations' property database, so that it can be flagged up to any contractors who are requested to carry out work in the affected areas. This information will be provided to Contractors at the point of instructing any works in the affected areas.

Management of ACMs

- The responsible person will ensure that all relevant persons working within any premises containing ACMs or presumed ACMs obtain sight of a copy of the most current asbestos survey information and that they are aware of the required procedures to minimise any risk of disturbing asbestos material. Relevant persons are most likely to be contractors and surveyors.
- The responsible person will decide whether any known ACMs are to be identified by labelling the material.
- The responsible person will update the current asbestos report regularly to reflect on site activity.

Monitoring

- Known ACMs will be re-inspected annually.
- Any presumed ACMs should, if positively identified, be re-inspected annually. This action will be instructed by the responsible person.

Emergency Action

- If ACMs that are known, presumed or suspected; are damaged or disturbed, the person working in the area will report immediately to the responsible person. Work will cease in the area and the area will be cordoned off.
- The area will then be inspected by a competent person, most likely to be a suitably qualified and experienced asbestos surveyor.
- Recommendations and action may include lifting samples for laboratory analysis, removal of material, encapsulation of material, labelling of material, air monitoring of area, clearance testing of area prior to re-occupation.

Plan Updates

- It is recommended that the location of all ACMs is detailed in the Asbestos Management Plan, which should be available for inspection by concerned parties.
- The responsible person will update the plan on an annual basis.
- Comment will be made in this management plan under the above heading “Known or Presumed Asbestos in this Building” where any change to the status of asbestos material occurs subsequent to the most current asbestos survey report.

Information on Asbestos

- The responsible person will ensure that all asbestos information is easily accessible by the relevant persons, preferably in an electronic format.

Staff Training

- The responsible person will arrange to provide all relevant administrative and technical staff with regular asbestos awareness training.

Tenant Awareness

- As ACMs could be present within tenants’ homes, the Association will periodically publish awareness reminders in newsletters advising tenants what materials might contain asbestos, and what to do if they have concerns on any materials within their home.

Responsibilities of All Staff

In practice, all staff will assist the Responsible Person in fulfilling their duties. In particular all maintenance staff must assist in relation to the Associations’ existing properties. In addition all employees must:

- Report any suspected asbestos containing material to the Responsible Person
- Not interfere with any materials suspected of being or containing asbestos
- Not collect samples from any materials suspected of being or containing asbestos

Staff may also encounter suspected asbestos containing materials in properties not owned by the Associations. For the avoidance of doubt staff should still follow this policy and procedures when this occurs.

There are however instances where suspected ACMs may be encountered during occupation of, or future works within, a property, and the following sections describe such circumstances and the appropriate course of action to be followed.

- New Development Projects - where available information indicates an original build date (or previous refurbishment works being carried out) prior to the year 2000, the Associations will instruct a Refurbishment and Demolition survey upon acquisition. This will serve to locate any ACMs within the building(s) and their condition; and establish a

recommended course of action prior to any demolition or rehabilitation works being carried out

- Mortgage to Rent Scheme - when considering potential property acquisitions through the Mortgage to Rent Scheme, it should be noted that asbestos surveys are not eligible costs within the scope of the subsidy provided by the Scottish Government. Notwithstanding this, where available information suggests the property was built prior to the year 2000, the Association shall instruct an Asbestos Survey upon acquisition. This shall serve to confirm, as far as possible, whether or not ACMs are present within the property and if so, their condition; and establish an appropriate course of action in managing any that are located.

Existing Housing Stock – Planned Maintenance, Improvement & Insurance Works and Adaptations

It is recognised that there will be variable levels of disturbance to the fabric of a building during planned maintenance, improvement and adaptation works.

At an early stage in the process of planning and commissioning planned maintenance, improvement or adaptation works, the Asbestos Register should be referred to in order to obtain any available information on the presence of ACMs (and if so, details about its location / extent) in the relevant properties.

In the event that the Register confirms or presumes the presence of ACMs within the relevant properties; and where its location indicates there is a possibility that this may be disturbed during the planned maintenance, improvement or adaptation works, the Associations will take steps to commission Refurbishment and Demolition surveys by suitably accredited surveyors and in accordance with HSE guidance. This will serve to locate any ACMs within the building(s) and their condition; and establish a recommended course of action prior to any demolition or rehabilitation works being carried out.

Reactive Repairs Work

The Asbestos Register entries confirm that a relatively small proportion of the Associations' stock contains ACMs. Where ACMs are present, they have normally been left in situ because they are in good condition; and are unlikely to be disturbed during normal occupation or typical reactive repair and maintenance work. Nevertheless, all contractors instructed to carry out repair and maintenance works in these properties should be advised accordingly irrespective of whether or not the ACMs are likely to be disturbed during these works.

Staff instructing work will be alerted to the presence of ACMs by an automatic alert when raising works orders. The order issued to the contractor should alert them to the presence of asbestos in the property.

There may be occasion where works are required in the immediate vicinity of the ACMs. Where there is a possibility that these works will disturb the ACMs, the relevant Maintenance Officer should agree an appropriate course of action with the contractor. This will include consideration of removal prior to works being carried out. In doing so, they should obtain the advice of suitably accredited surveyors as necessary.

Caledonia HA Care and Repair Client Property

Caledonia HA Care and Repair staff routinely visit privately owned property during the course of their work, for the purpose of undertaking technical surveys and inspections. In the event that Care and Repair staff members encounter suspected ACMs during these activities, they should recommend to the householder that they take steps to arrange for a Management or Refurbishment Survey to be undertaken. The survey type will be dependent on the location, nature and extent of the proposed works; in relation to the location and extent of suspected ACMs.

As far as practically possible Care and Repair staff will offer advice and assistance in finding and appointing a suitably accredited surveyor.

Care and Repair staff shall inform contractors of any suspected ACMs identified and confirm the recommendations made to the householder in relation to required surveys. It should be noted however, that ultimately, the contractor will be responsible for determining whether the proposed works will disturb any suspected ACMs; and for obtaining relevant survey information, or confirmation of removal, from the householder.

A fully audited record of the Association's actions in such situations will be created to ensure that Caledonia HA can demonstrate compliance with all statutory and good practice requirements.

Contractors' Discovery of Asbestos

In the event that maintenance or repairs contractors discover suspected asbestos containing materials the following process should be observed:

- Contractors should contact the Association immediately
- Advise contractors to stop all works in the property.
- Advise all persons to remove themselves from the area.
- Advise contractors not to remove any equipment or materials that may be contaminated.
- Arrange for area to be closed or seal off the area – if the property is occupied, advise the tenant not to use the room concerned.
- An asbestos warning notice will be displayed at the area concerned.
- Arrangements to be made for material to be inspected by UKAS accredited organisation and a report on this to be provided to the Association on actions to be taken to deal with the situation.
- The asbestos register to be updated by the Responsible Person.
- The contractor, and any other affected parties, will be advised in writing on the actions to be taken by the Association e.g. making safe, removal by appropriate asbestos contractor (based on acceptable method statement).
- The contractor and affected parties will also be advised in writing if the material concerned is not asbestos and arrangements made for works to recommence.

Removal of Waste

Section 34 of the Environmental Protection Act 1990 sets out the Associations' Duty of Care in relation to the management of controlled waste. This requires the Associations to ensure that waste is managed properly; recovered and disposed of safely in a manner that does not harm human health or pollute the environment; and is only transferred to a place and organisation authorised to receive it.

Where arrangements are made for asbestos to be removed and disposed of, the contractor will be required to adhere to all current waste management regulations, and copies of all necessary documentation and certification must be provided to the Associations.