

Asbestos Management Policy

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Signed off by: H&S Committee

Date last reviewed:	23/07/2024	
Due date for next review:	31/07/2025	
Policy consultation with:		
Legal Requirements:	Health and Safety at Work Act 1974 Control of Asbestos Regulations 2012	
CQC:		
Other:	HSG247: Asbestos: The Licensed Contractors' guide HSG248: Asbestos: The Analysts' guide for sampling, analysis and clearance procedures	
Related Policies:	Health and Safety Policy	
	Risk Assessment Policy	
	Decant Policy and Procedure	
	Data Protection Policy and Procedure	
Scope:	<p>These procedures apply to all Outward owned or Managed housing stock, including leasehold communal areas. The procedures provide guidance on the following:</p> <ul style="list-style-type: none"> • Asbestos surveys • Managing asbestos survey information • Actions following the survey • Reporting and monitoring • Training and awareness 	
Policy Equality Impact Assessed		

Version number	Amendments	Reviewed by	Date
1		Health and Safety Committee	18/06/2024

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1. Policy Statement

Requirements for asbestos surveys, Regulation 4 of the Control of Asbestos Regulations 2012, states that Outward have a duty to manage all non-domestic premises built before 2000. This includes all industrial, commercial buildings, public buildings and communal areas of flats.

Therefore all offices, plant rooms and communal areas of flats under Outward’s control will have an asbestos survey undertaken if it was built pre-2000. Where Outward manage a property through a management agreement, we will ensure the landlord can evidence correct asbestos management.

Please note that the duty does not apply to domestic premises such as private houses. However, the duty does apply to the ‘common parts’ of multi-occupancy domestic premises, such as purpose-built flats or houses converted into flats. The common parts of such domestic premises might include foyers, corridors, lift’s and lift shafts, staircases, roof spaces, gardens, yards, outhouses and garages but not the private domestic area inside each flat. (ACOP Document L143). However, Outward reserves the right to conduct asbestos surveys within private domestic areas

2. Purpose

The purpose of having the Asbestos management policy is to ensure the safety of Outward’s residents, people to whom we provide support, staff and visitors to any Outward owned or managed property and to ensure staff have an awareness of the risk management associated with Asbestos Management.

3. Responsibilities

Roles and responsibilities with regard to asbestos surveys:

The Assistant Director of Housing and Facilities has overall responsibility for ensuring that procedures are followed and agreeing the detailed asbestos management plan, and have responsibility within the housing department for asbestos management. They are deemed 'competent' to oversee the Asbestos Management Strategy as set out in this document. They manage the asbestos surveying contractor, the licensed removal contractor and ensure quality control.

The Housing Services and Compliance manager along with housing assistants are responsible for sending letters, raising works orders when required and acting as the contact for the asbestos surveying and licensed removal contractors.

Contractors must check the online asbestos register and comply with all relevant workplace and asbestos management regulations when carrying out works.

4. Procedures

All offices, plant rooms and communal areas of flats under Outward's control will have an asbestos management survey undertaken if it was built pre-2000. Outward's reserves the right to conduct asbestos surveys within private domestic areas of each flat/house as deemed necessary to ensure the health and safety of their employers undertaking works within the premises.

Outward may also conduct surveys within private domestic areas of each flat/house where a significant asbestos risk has been identified or reported. This is on a case-by-case basis as decided by The Assistant Directors of Housing and Facilities.

Refurbishment and Demolition Survey

Any property under Outward's ownership, and built prior to 2000, will have a Refurbishment and Demolition Survey undertaken prior to planned refurbishment or prior to significant maintenance (works that are outside the scope of what would be considered routine maintenance).

Any properties that are due to be demolished or fully refurbished will require a full Refurbishment and Demolition Survey prior to ordering works. In Leasehold properties Outward has a legal obligation to carry out asbestos surveys in communal areas only. If asbestos containing materials (ACM) are located in general needs dwellings within a mixed tenure block, Outward will notify leasehold customers who also reside in the block of the potential risks.

Asbestos Survey Standards Asbestos surveyors shall possess the BOHS P402 certificate as a minimum and have 6 months supervised field experience of conducting asbestos surveys. Laboratories conducting sample analysis shall be certified by UKAS to ISO/IEC 17025

Outward's stock condition is recorded on the Newlon? group database, Integrator, provides Outward with an asbestos module. This module provides an HSG264 compliant asbestos register, which can be accessed by authorised external partners via a secure web portal.

The module records information about asbestos containing materials and actions taken to manage those materials.

The Assistant Director of Housing & Facilities manages the ongoing survey programme for Outward owned properties.

Survey Programme

The Housing Services and Compliance Manager will supply the survey contractor with a list of addresses with the names and telephone numbers of tenants.

The survey contractor will be required to contact the tenants directly to advise them that an asbestos survey is being arranged. The letter and leaflet will be a jointly written and delivered by Outward or the owning Landlord and the survey contractor.

Access

The survey contractor contacts the tenant directly to arrange a convenient appointment

Refurbishment and void surveys

Where a survey needs to be carried out prior to refurbishment works (e.g. new kitchen), a letter from the Housing Services team, will be sent to inform the customer that the refurbishment work will not be carried out until after access has been given for the survey.

Where void works require a refurbishment survey, the survey will be commissioned on an individual basis. The survey will include all areas directly or indirectly impacted by major works. It is important to consider the potential for works to impact on multiple areas as with services (pipework or wiring), which may affect several rooms or into roof spaces etc.

The survey results information

The contractor will carry out both a priority and material risk assessment based on the location, type and condition of asbestos found in the property. This information will be uploaded into the Integrator Asbestos Module, which uses an approved algorithm to calculate the overall risk assessment, which will support the duty holder to determine what action must be taken.

The survey contractor will contact Outward, immediately if they identify any ACM they believe requires emergency works. The contractor will return electronic PDF copies of the surveys, relevant photographs and plans along with the completed spreadsheet of surveys uploaded to Integrator.

Integrator system stores the electronic data and will flag up properties with high risk for further assessment.

Actions Following the Survey

If ACMs are found in a property, there are seven courses of action that can be taken which correlate with the Integrator asbestos module:

- Emergency removal
- Remove
- Repair and encapsulate
- Encapsulate

- Manage in situ - re-inspection in accordance with the review timescale determined by risk ratings of identified or presumed ACMs.
- No action required

Outward's policy is to remove ACMs needing attention rather than repair or encapsulate. Repair and or encapsulation will only be considered where removal would be impractical or circumstances render it uneconomic (e.g. in a building due for imminent demolition or major refurbishment)

Removal

Where ACMs are identified in the property as requiring removal, Outward will arrange for it removal this must be removed and disposed of by an HSE licensed contractor or where it can be done as a non-licensed activity.

If the removal is deemed a non-licensed activity, the contractor will need to evidence that they have had the relevant training (UKATA Non licensed asbestos work training) and that they are following the task sheets/method statements recommended by the HSE in their publication "Asbestos Essentials".

Managing removal and repair

Where ACMs are to be removed, repaired or encapsulated the contractor carrying out this work will ensure that appropriate air monitoring is undertaken during works and a reoccupation certificate is obtained if required.

The removal, repair or encapsulation will be undertaken in accordance to relevant legislation and HSG247: Asbestos: The Licensed Contractors' guide, and HSG248: Asbestos: The Analysts' guide for sampling, analysis and clearance procedures (as applicable).

Where the works are deemed licensable by the HSE, there is a requirement for full 4 stages air clearance, site inspection and a re-occupation certificate to be issued. For non-licensable work, reassurance air monitoring will be undertaken by a competent analyst for a proportion (minimum 10%) of the works in order to audit the robustness of site safety methods.

All documentation relating to this work, including consignment notices and reoccupation certificate will be provided on a weekly basis as PDF files, which will be uploaded against each property.

The surveying contractor will also provide new survey records detailing the removal of any ACMs. Revised surveys should be submitted/uploaded to ensure Outward's asbestos register is current. Previous survey information will be retained and archived to provide an audit trail of ACMs in a property.

Informing tenants

Once the survey has been completed, the tenant of the property will be notified of the outcome and next steps. If removal or repair is required.

- Where no ACMs or low risk ACMs have been detected, the Housing Services Team will update the Outward's property database.

- Whilst ACMs remains in the property, Outward or its asbestos contractor will issue a reminder letter to the property every 24 months. Copies of letters sent will be saved in the Health and safety Folder in the Housing drive.
- Where medium risk ACMs have been detected, The Assistant Directors of Housing and Facilities will decide the appropriate course of action. Generally medium risk ACMs should be removed at the first opportunity, but regard needs to be given to practicality and costs. The Assistant Directors of Housing & Facilities will ensure the tenants are informed of the outcome of the asbestos survey and of what action Outward intends to take and the likely timeframe. If the asbestos is likely to remain in situ for a prolonged period, the tenants will be advised of the management strategy and how to minimize their risk of exposure to ACMs (i.e. if decorating etc.). Any concerns would also be flagged as UDC on Dynamics to ensure all staff are aware when raising repair requests.
- Where high risk ACMs have been detected, Outward will immediately take action, whereby Decant is necessary the Decant Policy and Procedure will be followed.

Re-inspection of Asbestos Containing materials

Risk ratings are assigned based on the material and priority assessments conducted by the nominated asbestos surveying contractor. Following consultation with the surveyor or appointed asbestos consultant priority assessment scores may be amended; where this occurs records shall be retained to confirm the reasons for this. The following risk rating / inspection frequency shall be adopted:

- High Risk – 12 months
- Medium Risk – 18 months
- Low Risk – 24-36 months
- Very Low Risk – 60 months

Managing asbestos survey information

Survey and risk information will be contained in Integrator and made available, to all Outward employees involved in ordering repairs works and all contractors employed for repair works, via the online Integrator portal.

All contractors will need to follow their own internal asbestos management procedures when undertaking works.

The Housing Services and Compliance Manager will act as systems administrator and ensure that all relevant employees and contractors have a login to the system.

The Housing Services and Compliance will carry out periodic checking to ensure logins are being used by contractors and this will form part of the quality and health and safety checking done on contractors.

A contractor failing to demonstrate they have checked asbestos information on at risk properties before commencing works will be reported as a health and safety incident, even where no ACM was not disturbed.

Reporting and Monitoring

The Assistant Director of Housing and Facilities will monitor the survey programme to ensure that the surveying contractor provides the required service in line with the terms of the contract and in accordance with HSG 264.

An external consultant shall be appointed to provide advice to Newlon and assist with the monitoring and inspection of surveys and removals.

The Housing Services and Compliance Manager will report any asbestos incidents or licensed removals to the Outward's Executive or Health and Safety Committee.

Learning and Development.

All Outward staff will receive mandatory UKATA Asbestos Awareness Training every three years with refresher courses delivered more frequently if regulatory or legislative changes are made.

Housing staff that may handle queries from residents, scheme managers, Tenant management Officers and others personnel shall receive a one hour asbestos briefing from a competent person and complete the asbestos e-learning module.

5. References/Further Reading/ Technical terms

- ACMs – Asbestos Containing Materials
- Competent Person – as defined within Asbestos: The Survey Guide HSG264 (Section 2)

6. General Data Protection Regulations Statement

Outward is committed to compliance with the General Data Protection Regulations and the Data Protection Act 2018. It requires all staff and partners to respect confidentiality and data subjects' rights in line with its policies and procedures.

To ensure compliance with the Regulations staff must ensure that any personal information produced or processed as part of these procedures is appropriately filed on SharePoint, Sona, Iplanit, the Outward server or other agreed Password-controlled filing system(s) with role-based access control.

Whilst processing paper documents, including those from third parties, these documents must be stored in secure lockable cabinets. Records will be kept for as long as they are needed to meet the operational needs of Outward, together with legal and regulatory requirements. Where there is a deviation from this principle, the reasons for this must be recorded.

A detailed breakdown of retention and deletion of records can be found in Outward's Record Management and Retention Policy.

When disposing of documents containing personal data this should be done via confidential waste.

Please refer to Outward's Data Protection Policy and Procedure for more information.