

Asbestos Management Policy

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Health and Safety compliant	Yes

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1. What this policy is about and why we need it

The overall aim of this policy, and the associated management plans and procedures and control documents is to ensure that Acis Group Ltd (AGL) recognises the risks associated with Asbestos Containing Materials (ACM's) due to exposure to respirable fibres

AGL aims to protect the occupiers of its properties, as well as other residents, visitors, staff, contractors, and the general public, from the risks associated with exposure to Asbestos fibres so far as is reasonably practicable.

This document sets out key policy objectives, control measures and accountabilities for reducing risk arising from the control of Asbestos.

This purpose of this policy is to ensure AGL meets its obligations under the relevant legislation and associated Approved Codes of Practice (ACOP's).

The application of this Policy ensures that AGL meets compliance with the outcomes of the Regulatory Framework for Social Housing in England introduced by the Regulator of Social Housing as outlined below:

- *(Registered Providers must) meet all applicable statutory requirements that provide for the health and safety of the occupants in their homes*

2. Who does this policy apply to?

This policy applies to all residents, contractors, the general public, visitors and AGL staff living, visiting, or working in or around any property owned or managed by AGL.

3. Our policy

3.1 Objectives

AGL will achieve compliance so far as is reasonably practicable with the above regulatory requirements by:

- Identifying ACMs within relevant buildings either by direct survey or based on archetypal data. Where it is not reasonably practicable to identify ACM's, for example where they are located in inaccessible areas, then AGL will presume that asbestos is present and manage accordingly.

- Risk assessing each identified ACM, considering the likelihood, and the likely number of people that might be exposed, in the event of an uncontrolled release of fibres which will form the basis of the Asbestos Management Plan (AMP).
- Outlining clear lines of responsibility for the management of ACM's (see 3.2)
- Implementing appropriate control measures to reduce the risk of exposure of people to fibres from each ACM.
- Following the corporate property access procedure to attempt to gain access to undertake asbestos surveys.

The following general principles will be applied:

- Where ACMs are assessed as being in good condition they will be left in situ and managed via the AMP.
- Where ACMs are assessed as posing a risk to health, they will be removed or encapsulated.
- Where removal or encapsulation is not reasonably practicable then access to the ACM will be managed to reduce the risk of exposure.
- Implementing a system of monitoring of each remaining ACM at intervals determined by the risk assessment as identified in the AMP.
- Carrying out a Refurbishment and Demolition survey as an integral part of the planning process for any refurbishment or demolition works carried out in AGL owned, managed, or occupied premises that disturb the fabric of the building where required. As a minimum, a Management Survey will be completed for every applicable property if suitable archetypal data is not available.
- Managing and maintaining accurate and up-to-date Asbestos information records that can be accessed and pro-actively informed by all relevant stakeholders
- Planning, managing, delivering, and monitoring all work that could result in the release of asbestos fibres.
- In the case of works that involve the removal or encapsulation or other activities that may lead to the release of asbestos fibres, these will be carried out by either suitably trained AGL staff or an HSE licensed contractor depending on the nature of the works.
- Devising and implementing emergency procedures to reduce the risk of exposure of people as low as is reasonably practicable in the event of an unplanned and/or uncontrolled release of asbestos fibres.

- Providing suitable and sufficient information, instruction, training and supervision to employees and contractors to reduce the risk of an uncontrolled release of asbestos fibres.
- Assessing performance against key targets for compliance for communal property surveys falling under CAR Regulation 4, domestic property surveys and domestic reinspection surveys
- Reviewing this policy and any associated procedures at regular intervals, or following any uncontrolled release of asbestos fibres, to ensure that it is working efficiently and effectively

3.2 Responsibilities

The table below identifies key responsibilities

Role/ Responsibility
The Chief Executive is the named Duty-holder as required in the Control of Asbestos Regulations (CAR) 2012 2 nd Edition and has overall <u>accountability</u> for this policy.
The Director of Property Services is <u>responsible</u> for: • Ensuring that adequate resources are made available to enable the key policy objectives and targets of the policy are met And is <u>accountable</u> for: • Overall policy implementation • Ensuring any dangerous occurrences involving asbestos are investigated and where instances are RIDDOR reportable, taking appropriate action.
The Head of Property Development & Assets is <u>responsible</u> for: • Overall policy implementation And is <u>accountable</u> for: • Achieving the key policy objectives and targets identified, including the designing, and implementing of associated procedures, staff training, and communication to customers. • Ensuring any dangerous occurrences involving asbestos are investigated • Ensuring all contractors carrying out works due to development activities that may disturb asbestos, comply with this policy and procedures • Ensuring that the data required to update the Asbestos Register for any work that identifies, encapsulates, or removes asbestos resulting from demolition, refurbishment or regeneration is passed to the Asset Compliance Surveyor • Ensuring that licensed contractors approved by the HSE are used for Licensed work, and seeking suitable evidence of competence for unlicensed work
The Property Compliance and Data Manager is the 'Responsible Person' as defined in CAR 2012 2nd Edition and is <u>responsible</u> for: • Achieving the key policy objectives and targets as set out in this Policy

- Managing a programme of internal and external audits which will check that the policy and procedure is being followed
- Reporting assurance to Board

And is accountable for

- Ensuring the Asbestos Register is up to date and accurate
- Ensuring that the reports and data used to measure compliance are accurate

The **Asset Compliance Surveyor** is the '**Deputy Responsible Person**' as defined in CAR 2012 2nd Edition and is responsible for:

- Monitoring the key policy objectives and targets as set out in this Policy
- Monitoring a programme of internal and external audits which will check that the policy and procedure is being followed
- Producing data to assist in the reporting of assurance to Board
- Assisting internal and external contractors by providing technical advice and support
- Providing guidance and approval of asbestos removal contractors licensed by the HSE for Licensed work, and approving competence for unlicensed work
- Managing the annual reinspection of known asbestos in non-domestic assets.
- Liaising with customers regarding asbestos risks resulting as part the Alteration At Own Expense process.

And is accountable for

- Monitoring the accuracy and completeness of the Asbestos Register
- Ensuring that the reports and data used to measure compliance are accurate

The **Asset Investment Manager** is responsible for:

- Producing an annual programme of works and passing this to internal and external contractors to allow for the safe management of all operational risks, including ACM management.

The **Acis Repairs & Maintenance Management Team** are responsible for:

- The management of all contractors carrying out works that may disturb asbestos works due to planned works, repairs, maintenance, and voids, ensuring that they comply with this policy and procedure
- Ensuring that the data required to update the Register for any work that identifies, encapsulates, or removes asbestos is passed to the Asset Compliance Surveyor
- Ensuring that any work undertaken internally or externally is delivered within the competency framework identified in the AMP.
- Ensuring an appropriate survey is in place prior to any works commencing.
- Ensuring that external contractors check the Asbestos Register and carry out on-site risk assessments to establish the likelihood of asbestos being disturbed. before any work is carried out.

The **Planning Manager** is responsible for:

Co-ordinating access into properties to carry out asbestos surveys, reinspection's and remedial works.
Neighbourhoods staff are <u>responsible</u> for - Supporting the Asset Team and contractors in gaining access to carry out asbestos surveys, reinspection's and remedial works. - Ensuring that any information regarding ACM's identified in relevant stock is communicated in accordance with the Lettable Standard
The Health and Safety Manager is <u>responsible</u> for: - Ensuring any dangerous occurrences involving asbestos are investigated and where instances are RIDDOR reportable take appropriate actions - Ensuring all staff have undertaken accredited asbestos training relevant to the work they undertake and as a minimum have completed asbestos awareness training
All Employees have the <u>responsibility</u> to: Abide by all information and training provided and promptly report any incidents regarding asbestos.

4. How we will monitor this policy

This policy will be subject to external technical review and internal approval every 3 years for accuracy and appropriateness or sooner where any legislative changes or requirements dictate or following any asbestos incident.

Operational performance will be monitored and reported every month by the Asset Team and the following information will be reported to the Operations Committee every quarter:

- Number and % of communal areas/block with an asbestos survey =< 12mths
- Number and % of domestic properties with an asbestos survey

In addition, where customers have used the services covered by this policy and wish to provide feedback, including suggested improvements, these will be collated and used at the time of the review.

5. Equality & Diversity

AGL is committed as an employer and provider of housing services to equality of opportunity for all. In addition to this statutory duty under the Equality Act 2010, it is further committed to developing a culture, which recognises wider social diversity in its communities and therefore respects and recognises the values and needs of

individuals regardless of whether they belong to a particular section of society or group provided for by legislation.

The group will work with minority and vulnerable groups, support groups, resident forums, and external agencies to ensure they contribute to policy and service development.

All customers will have access to this document upon request.

This document can be translated or provided in alternative formats (e.g. large print, Braille, audio) upon request.

Equality and Diversity awareness training is mandatory for all staff.

Contractors delivering the service will be expected to follow AGL' Equality and Diversity Policy.

6. Data Protection

All parties referred to in this policy must abide by the 6 principles of the General Data Protection Regulations as detailed below:

- Lawfulness, fairness, and transparency
- Purpose limitations
- Data minimisation
- Accuracy
- Storage limitations
- Integrity and confidentiality

7. Procedures and other documents that link into this policy

The following procedures link to this policy

- Asbestos Management Plan

8. Links to other policies,

Other policies and strategies that link into this policy are:

- Asset Management Strategy
- Lettable Standard
- Void Standard
- Repairs and Maintenance Strategy
- Health & Safety Policy

- Equality & Diversity Policy
- Data Protection Policy
- Development Policy

9. Legislation

In developing this policy, information, guidance, and references have been taken from the following:

- The Health & Safety at Work Act 1974
- The Management of Health & Safety at Work Regulations 1999
- Control of Asbestos Regulations 2012 2nd Edition
- The Housing Act 2004 which introduced the Housing Health and Safety Rating System (HHSRS) and the Housing Health and Safety Rating System Regulations 2005.
- Construction (Design and Management) Regulations 2015

10. When this policy will be reviewed

This policy will be reviewed every 3 years or in the event of a change in regulations.

11. Jargon buster

Reference	Definition
Asbestos	Asbestos is a naturally occurring fibrous silicate mineral. There are six types, all of which are composed of long and thin fibres, that can be released into the atmosphere by abrasion and other processes. Asbestos has many useful properties and was widely used as a building material. However, it is now a well-known health and safety hazard and the use of asbestos as a building material has been illegal in the UK since 1999. Inhalation of asbestos fibres can lead to various serious lung conditions, asbestosis and cancer
ACoP	An Approved Code of Practice describes the recommended methods that should be used (or standards to be met) to comply with Health and Safety legislation

12. Appendices

Appendix A – Asbestos Management Plan