Dalmuir Park Housing Association
Your Future Our Future

Asbestos Management Policy

Purpose:	To establish DPHA's policy and set out our position on Asbestos Management
Review Date:	October 2021
Guidance:	Health & Safety at Work Act 1974 The Management of Health and Safety at Work Regulations 1999 The Control of Substances Hazardous to health Regulations 2002 The Construction (Design and Management) Regulations 2015 The Control of Asbestos Regulations 2012 The Health and Safety Executive Documents e.g. • HSG264- Asbestos: The Survey Guide; • HSG248- Asbestos: The Analysts' Guide for Sampling, Analysis and Clearance Procedures • EM1- Asbestos Essentials.
Regulatory Standards:	1. The governing body leads and directs the RSL to achieve good outcomes for its tenants and other service users. 2. The RSL is open about and accountable for what it does. It understands and takes account of the needs and priorities of its tenants, service users and stakeholders. And its primary focus is the sustainable achievement of these priorities. 3. The RSL manages its resources to ensure its financial well-being and economic effectiveness. 4. The governing body bases its decisions on good quality information and advice and identifies and mitigates risks to the organisation's purpose.
Date reviewed by Policy Review Working Group (PRWG):	23 October 2020
Date approved by Management Board:	

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1.0 INTRODUCTION

1.1 Dalmuir Park Housing Association (DPHA) recognises its duties under the Health and Safety at Work Act 1974 and the Control of Asbestos Regulations 2012 (CAR) and will responsibly manage and control asbestos and asbestos containing materials (ACMs) within its buildings so that they do not present a risk to employees, residents, visitors, service users, contractors or members of the public.

2.0 AIMS OF THE POLICY

2.1 To ensure that the Association complies with all relevant legislation, approved Codes of Practice, Health and Safety Executive guidance notes etc. in relation to the management of asbestos specifically, Regulation 4 of the Control of Asbestos Regulations 2012 (CAR). This requires us to make and keep up-to-date, a record of the location and condition of the asbestos containing materials or materials which are presumed to contain asbestos.

2.2 To ensure that the Management Board as the governing body, staff and contractors are aware of their responsibilities in relation to the management of asbestos.

2.3 To identify and manage all risks involved.

2.4 To prevent as far as is reasonably practical, exposure to risks associated with asbestos containing materials.

2.5 To ensure that an appropriate asbestos surveying process remains in place, taking account of the need for asbestos management, refurbishment and demolition surveys as appropriate in accordance with current legislation.

2.6 To produce, maintain and regularly review an Asbestos Register.

2.7 To ensure that all contractors and sub-contractors engaged to carry out work on any of the Association's properties are provided with a summary, listing all relevant premises and areas that may contain asbestos which may be disturbed by their works.

2.8 To ensure current and new tenants are made aware of any known or potential presence of asbestos in their home and given advice on how to prevent any risk by avoiding disturbing material.

2.9 To ensure that information regarding the presence of asbestos is contained in tender documentation for works as may be appropriate.

2.10 To ensure licensed contractors carry out all major asbestos works but allow local contractors to carry out minor asbestos works in accordance with HSE recommendations.

2.11 To ensure that all staff of the Association and local contractors are provided with

appropriate training in this policy.

3.0 LEGAL AND REGULATORY REQUIREMENTS

3.1 Legislation and Regulation

- Health & Safety at Work Act 1974
- The Management of Health and safety at Work Regulations 1999
- The Control of Substances Hazardous to health Regulations 2002
- The Construction (Design and Management) Regulations 2015
- Control of Asbestos Regulations 2012

3.2 Guidance

- HSG264- Asbestos: The Survey Guide
- HSG248- Asbestos: The Analysts' Guide for Sampling, Analysis and Clearance Procedures
- EM1- Asbestos Essentials

4.0 ASBESTOS IDENTIFICATION

4.1 The duty in the regulation is to manage asbestos in our housing stock and this requires the Association to make an assessment as to whether asbestos is present and take further steps depending on what is found.

4.2 All of the Association's housing stock was built pre-1999. The Association therefore will undertake visual surveys in every void property as and when they arise to identify possible asbestos. We will do the same in properties that we inspect as part of our major repair programme. An address list of the Association's properties by development phase and year of build is attached at **Appendix 1.**

5.0 RISK ASSESSMENTS

5.1 It is the responsibility of all staff to report to the Asset officers, if they suspect that disturbed or damaged asbestos containing materials may be present in a building owned or occupied by the Association. In a case where an accessible material is suspected of containing asbestos, and where this material may reasonably become disturbed, this would also apply.

5.2 Risk Assessments will be carried out in accordance with the regulations and a decision made if asbestos is found on whether the asbestos should remain in situ, be sealed or be removed.

5.3 Where properties have been identified as having asbestos containing materials (ACMs) and it requires to be removed, sealed or remain in its current condition, tenants will be informed of its existence and what our proposals are for removal or sealing.

5.4 A specialist asbestos contractor will be employed to ensure that the ACMs are sealed or removed safely without exposing the community and tradesmen to the risks associated with ACM's.

6.0 MANAGEMENT OF RISKS

6.1 At least 1 specialist asbestos contractor will be held on our contractor framework at all times. **Appendix 2** provides details of organisations providing specialist advice on asbestos matters.

6.2 An Asbestos Management Register has been developed and identifies properties where ACMs have been identified or are suspected.

6.3 When major repair contractors are appointed, part of the conditions of contract will be that they advise the Association immediately and cease working if they suspect that any ACMs are present. An appropriate survey will then be carried out and a specialist contractor employed for removal or sealing.

6.4 In all other cases, our Housing Management Software has the facility to highlight on job orders where ACM's have been identified or are suspected.

6.5 We will develop and issue an advice leaflet for current and new tenants to alert them to any known risk of asbestos and what steps they should take to avoid disturbing asbestos containing material particularly if undertaking alterations. This information will also be contained on our website.

7.0 RESPONSIBILITIES

7.1 Management Board Responsibilities

- Overall corporate responsibility for the conduct of the business of the Association.
- Responsible for compliance with the Health and Safety at Work Act 1974 and all associated legislation, including asbestos management.
- Ensures effective implementation, monitoring, auditing and reviewing of the Asbestos Management Policy.

7.2 Chief Executive's Responsibilities

- Responsible for the general day to day running of the Association and has overall responsibility for health and safety management within the organisation.
- Report to the Management Board on safety failures or outcomes of any internal or external audits.
- Ensure that all staff receive appropriate asbestos management training proportionate with their roles and responsibilities.

7.3 Customer Service Team Leader Responsibilities

- Implementation of the Asbestos Management Policy.
- Investigate and report to the Chief Executive / Management Board on any alleged incident of accidental asbestos exposure and also for ensuring the correct reporting of incidents where appropriate.

- Provide the Health and Safety Executive or any other regulators with details of asbestos management procedures if / when requested.
- Review and update as necessary the Asbestos Management Policy.
- Ensure that all staff are familiar with the contents of the asbestos management policy documents in so far as it is relevant to their roles and responsibilities.

7.4 Asset Officer Responsibilities

- Develop and maintain the Asbestos Register.
- Investigate and report to the Customer Service Team Leader any alleged incident of accidental asbestos exposure.
- Provide the Health and Safety Executive or other regulators with details of asbestos management procedures if / when requested.
- Review and make recommendations to the Customer Service Team Leader as necessary to amend this policy to ensure continued compliance with legislation, codes of practice etc.
- Promote awareness of the hazards of asbestos containing materials and the Association's Asbestos Management Policy amongst residents, staff and contractors.
- Arrange samples to be taken of any suspected materials, in accordance with prescribed procedures and arrange for the analysis of the samples by an accredited asbestos testing/survey organisation with the appropriate UKAS (United Kingdom Accreditation Service) accreditation and updating register.
- Programme surveys in the Association's properties to identify any asbestos containing materials that may be present and to prepare and maintain an Asbestos Register Entry for each building / property.
- Organise annual audits of the Asbestos Register.
- Maintain a current list of approved HES Asbestos Licenced Contractors and UKAS accredited asbestos testing / survey organisations and also approve any contractors undertaking asbestos work on behalf of the Association's contractors.
- Inform all staff, contractors and sub-contractors as to the presence of any asbestos containing materials known to have been affected by the works.
- Halt any works and inform staff if suspected materials are discovered during the course of any works.
- Co-ordinate tenant information and work procedures when alterations to property requests are received.

7.6 Housing Officers Responsibility

- Inform the Asset Officers of any concerns they have of potential asbestos containing material when they visit tenant's homes or conduct visual inspections of our properties.
- Issue tenant information leaflets on asbestos when letting property to new tenants.
- Provide advice in conjunction with the Asset Officers when alterations to property requests are received.

8.0 ASBESTOS MANAGEMENT PLAN

8.1 The management of ACMs within our properties will be carried out in the following ways:

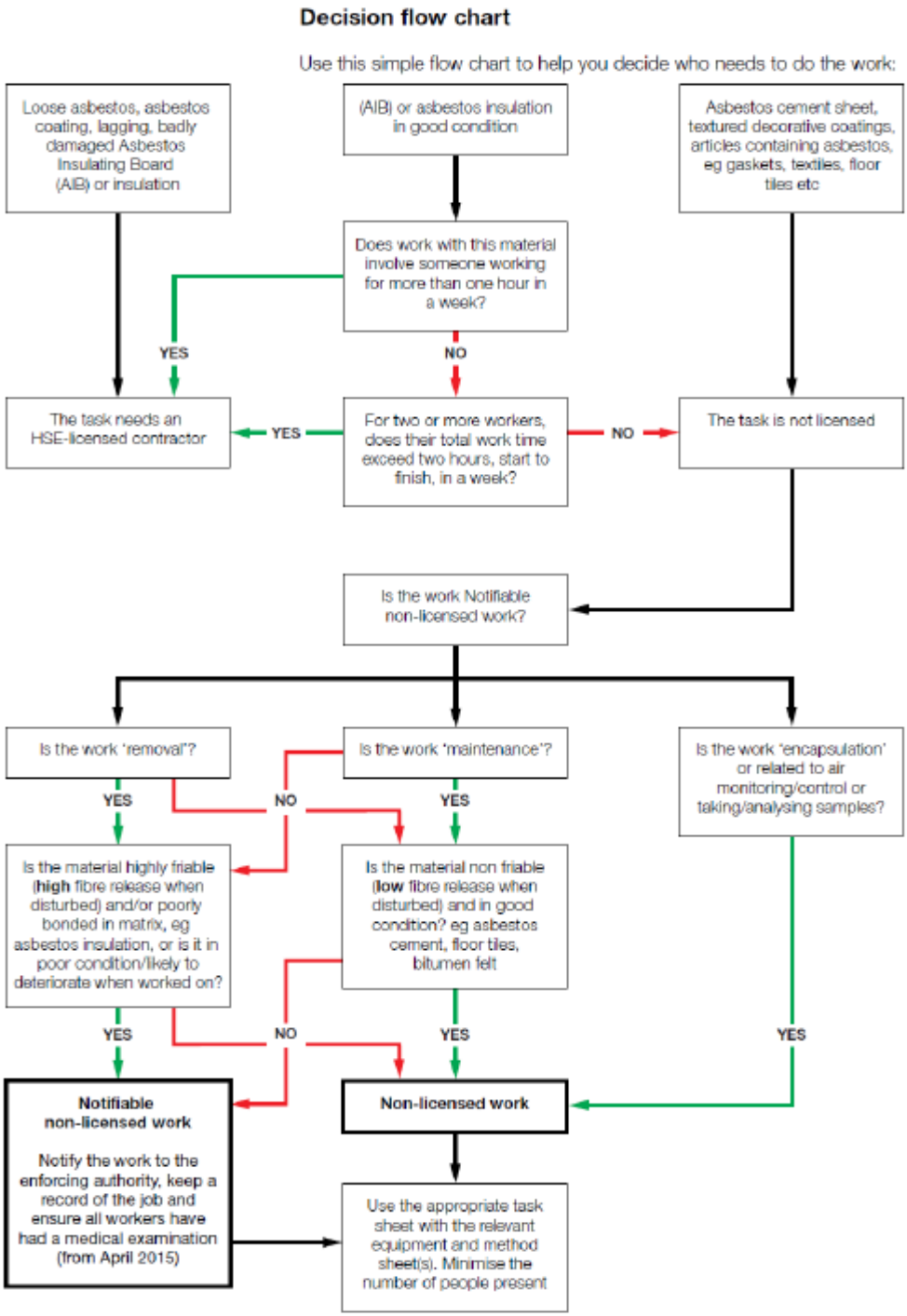
- We will expect all contractors who carry out work on behalf of the Association to be aware of asbestos and the risks of working with asbestos.
- We will maintain an Asbestos Register.
- We will survey, manage and report on the condition of any asbestos that is identified in accordance with the regulations and this policy.
- Where asbestos is suspected we will have it tested and either removed or managed in accordance with regulations and this policy.
- We will ensure that Association staff have appropriate training to their roles / responsibilities in respect of asbestos / asbestos management.
- We will ensure that Association staff are adequately informed and instructed regarding the identification, management and risk from exposure to asbestos.
- We will ensure that any maintenance / refurbishment contractors are adequately informed and instructed regarding the identification, management and risk from exposure to asbestos.
- We will provide a copy of our Asbestos Management Register to our reactive repair contractors.
- We will ensure that all tenants/residents are adequately informed and instructed regarding the identification, management and risk from exposure to asbestos.

8.2 Work likely to disturb or remove asbestos must be carried out by an HSE licensed asbestos removal contractor and notified to the HSE 14 days prior to commencement.

8.3 However, the Control of Asbestos Regulations 2012 does allow work with certain lower risk asbestos containing materials (e.g. asbestos cement and asbestos textured coatings) to be carried out by non-licenced personnel and without notification to the HSE. The three categories of asbestos work are:

- Major works: Licensed works – 14-day notification and licensed contractor (highest risk work).
- Minor works: Notifiable non-licensed works – notification before works start and competent (non – licensed) contractor.
- Minor works: Non-notifiable non- licensed works – no notification and competent (non – licensed) contractor.

8.4 All work with asbestos containing materials must be carried out by competent and trained personnel. However, most asbestos work must be carried out by an HSE licensed contractor. In addition, all asbestos waste is classed as ‘Special Waste’ and must be handled, stored, transported and disposed of in a legally compliant manner. The following HSE chart shows the decision making process in determining who can carry out the works.



*ACS definitive guide to asbestos management

9.0 ACQUISITIONS

9.1 Prior to acquiring any additional stock, a survey will be carried out. Thereafter all properties acquired will be incorporated into our Asbestos Management Register.

10.0 EQUALITY AND DIVERSITY

10.1 We are committed to promoting an environment of respect, understanding, encouraging diversity and eliminating discrimination by providing equality of opportunity for all. This is reflected in our Equality and Diversity Policy.

11.0 COMPLAINTS

11.1 Although we are committed to providing high levels of service, we accept that there may occasions where you may not be not satisfied with the service you have received from us. We value all complaints and use this information to help us improve our services. Our Complaints Policy describes our complaints procedure and how to make a complaint.

12.0 GDPR

12.1 We will treat your personal data in line with our obligations under the current data protection regulations and our Privacy Policy. Information regarding how all data will be used and the basis for processing all data is provided in our Customer Fair Processing Notice.

Appendix 1: Address List by Development and year of build

Property Descriptions	Total No. Units	Comments
Pre-1919		
Tenements	435	Original stock from set up of Association in 1978 with additions through acquisitions. Most of these properties were subject to comprehensive tenement improvements from 1975-1989.
1919 - 1944		
Houses	2	1 Detached house and 1 semi-detached house.
1965 – 1982		
Nairn Street & Nairn Place	50	Stock transfer from SSHA in 1995
Ailsa Drive & Riddell Street	2	Detached houses
1983 - 2002		
Shaftsbury Street complex	47	Stock transfer from SSHA in 1995,
Adelaide Court, Mountblow	32	Flatted and terraced house new build development built in 1995 with mixture of tenanted and shared ownership.
Burns Street	8	New build tenement type properties built in 1988
The Crescent	38	New build flats built in 1992,
Dumbarton Road	29	New build flats built 1994
Glebe Court, Old Kilpatrick	10	New build shared ownership development, 1 has been bought back into full tenanted stock
Iona Crescent, Old Kilpatrick	27	New build flatted, and terraced house development built in 1992.
Old Street, Duntocher	2	2 Shared ownership properties in a 4 in a block, not factored by DPHA.
Pattison Street	7	New build terraced houses, and one tenement building, built in 1988.
Total Rental Stock	689	

Appendix 2: Details of organisations providing advice

1. Health and Safety Executive Online advice – www.hse.gov.uk Telephone – 0300 003 1747 Monday to Friday 8.30am – 5pm. Wednesdays 10am – 5pm
2. ACS Represents RSL's in the delivery of Health & Safety Management on behalf of EVH, including asbestos management. http://www.acsrisk.com
3. Asbestos Removal Contractors Co-operative (ARCA) Represents the interests of asbestos removal companies and associated businesses. www.arca.org.uk
4. Asbestos Testing and Consultancy (ATAC) Represents the interests of asbestos surveyors and asbestos analysts. www.atac.org.uk

Appendix 3: Contractors Advice Form

DALMUIR PARK HOUSING ASSOCIATION LTD

ASBESTOS MANAGEMENT PLAN

CONTRACTOR'S ADVICE FORM

In accordance with the Association's procedures, you are hereby issued with details of any asbestos contained in the properties you are about to carry out repair work in. (Attach extract from Asbestos Register to the form)

Please sign this form to confirm that you will take all necessary precautions on site to protect yourself, the community and other operatives from any possible dangers associated with asbestos. Your employer should have provided you with safe working instructions and appropriate safety clothing in respect of this type of work.

Signed: _____ Date: _____

Name of Company: _____