

# Asbestos Policy & Survey Strategy

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## **Asbestos Policy & Survey Strategy**

Risk Management – This policy ensures that the Association will meet its legal responsibilities on assessment of asbestos risk and control of Asbestos Containing Materials (ACMs).

Risk Assessment – Low if the action contained within this policy is implemented.

Equal Opportunities – We are mindful of the definition of equal opportunities set out within the Scotland Act 1998 which states that “equal opportunities” means the prevention, elimination or regulation of discrimination between persons on grounds of sex or marital status, on racial grounds, or on grounds of disability, age, sexual orientation, language or social origin, or of other personal attributes, including beliefs or opinions, such as religious beliefs or political opinion.” As a Housing Association we are working towards building equalities considerations into all areas of our work. For this policy, the key issues are around clarity in communication and consistent and accountable reporting arrangements.

### **1.0 Purpose of Policy**

#### **1.1 Objectives**

The purpose of our Asbestos Management Policy is to clearly set out our approach to managing asbestos risk. Our objectives are;

- To fulfill our legal obligations and;
- To fulfill our duties to tenants, staff, contractors and all third parties.

#### **1.2 Legal Obligations**

The risk and danger of exposure to asbestos is well documented in relation to the construction and maintenance industries. Our duties under the Health & Safety at Work Act 1974 require us to ensure the health & safety of employees and other third parties as so far as reasonably practicable. We have a duty to manage asbestos risk when undertaking refurbishment or maintenance work to our housing under;

- Construction (Design and Management) Regulations 2007, (CDM) and;
- The Control of Asbestos Regulations 2012

We will adopt a practical approach to our assessment of asbestos risk before undertaking maintenance or major refurbishment work. Where the presence of Asbestos Containing Materials (ACMs) is suspected, a specialist asbestos sample & test will be instructed. No member of staff will take samples of suspect ACM. Work will not be undertaken until the test results are received. If a test is positive, an assessment of the risk will be made to determine if removal or on-going management is appropriate.

### **1.3 Background Information**

Over the last few years we have received conflicting advice on our Duty to Manage asbestos from various “specialist” consultants. In light of this challenging environment, we researched Health & Safety Guidance and subsequently clarified the position with Health & Safety specialist ACS Environmental. ACS is employed by Employers in Voluntary Housing to ensure all member associations adhere to statutory Health & Safety requirements. Our approach to managing asbestos was singled out by ACS as best practice and used by EVH in an article in their magazine, distributed to all housing associations.

The majority of our housing stock was constructed between 1948 and 1958. Health & Safety Executive guidance notes that buildings constructed after 2000 are deemed to be asbestos free. We have a Duty to Manage Asbestos risk.

We have established a strong stock information database and record the presence of ACMs. We will continue to adopt a responsible and proportionate approach to assess suspect ACMs when undertaking work.

### **1.4 Asbestos Definitions**

There are three main types of asbestos;

<b>TYPE</b>	<b>RISK CATEGORISATION</b>	<b>COLOUR</b>	<b>SOME COMMON USES IN PREMISES</b>
Chrysolite	LOW	White	Cement products, textured decorative coatings, Bitumen or vinyl materials. Roofing, cladding, plasters and floor or ceiling tiles.
Amosite	HIGH	Brown	Fire protection – Sprayed coatings, lagging insulation boards.
Crocidolite	HIGH	Blue	Fire protection – Sprayed coatings, lagging insulation boards.

Some ACMs are more vulnerable to damage and are more likely to disperse fibres. In general, materials that contain a high percentage of asbestos are high risk as they can be more easily damaged and release fibres. Cement based products are categorised as low risk; asbestos is contained within the cement and is unlikely to give off fibres unless badly damaged or is drilled or cut.

## **1.5 Asbestos Register**

The Asbestos Register is our key document for handling and recording all information on the presence of and testing of asbestos. The Register records all known test results, positive or negative and management notes by;

- Property Address
- Location of asbestos and <sup>2</sup>m of area
- Type of Asbestos
- The condition and risk associated with the type of asbestos
- Remedial Action
- On-going Inspection details

Our Asbestos Register records where ACMs are present in our stock. We have identified the following asbestos risks;

- |                     |                             |          |
|---------------------|-----------------------------|----------|
| • Soffit Boards     | Atholl Steel Construction   | Low Risk |
| • Soffit Boards     | Cruden Cottage Construction | Low Risk |
| • Garage Roof       | Kilmaurs – Trad Cottage     | Low Risk |
| • Vinyl Floor tiles | Netherthird – Weir Steel    | Low Risk |

The Asbestos Register is maintained and updated from in-house surveys, independent stock condition surveys, periodic structural surveys and from specific asbestos surveys. The register contains the address of the property, the specific location of the suspect ACM, the date and outcome of the test result and action taken to manage the risk of exposure to asbestos. We conduct specific asbestos surveys where suspect ACM is discovered and on a sample basis prior to refurbishment work. To date, 85% of specific asbestos tests have been negative, 15% are positive and relate to ACMs introduced by 3<sup>rd</sup> parties, namely tenants or previous tenants.

## **1.6 Personnel Responsibilities**

We employ a Construction, Design and Management co-ordinator when undertaking contract work. The CDM co-ordinator is responsible for co-ordinating health & safety risk management matters, preparing the contract Health & Safety File and providing specialist advice to assist us in meeting Health & Safety obligations.

### **CDM Co-Ordinator shall:**

- Adhere to the requirements of the Construction (Design & Management) Regulations 2007, Approved Code of Practice (ACOP)
- Identify & collate pre-construction phase plan
- Assess if asbestos surveys need to be commissioned
- Prepare the Health & Safety File

### **Head of Development & Contracts shall;**

- Share our asbestos register with contractors and consultants on appointment
- Confirm Asbestos survey arrangements at Pre-Start Contract Meetings
- Ensure Asbestos Awareness training and guidance is provided to staff
- Conduct annual inspections of known ACMs

- Ensure that sufficient arrangements exist to implement and manage this policy and its procedures
- Ensure the policy and procedures are regularly reviewed and updated
- Ensure practice on the removal of ACMs complies with regulations.

**The Operations Team shall;**

- Arrange sampling & testing of suspected ACMs
- Provide information on the presence of ACMs to contractors, tenants and other relevant parties.
- Update the Asbestos Register on receipt of test results
- Advise the Head of Development & Contracts on the presence ACM's

**All Staff shall:**

- Read understand and follow the guidance of this policy
- Undergo Asbestos awareness training

**Contractors shall:**

- Read understand and fully implement this policy
- Ensure guidance and awareness training for operatives is provided
- Ensure that operatives are made aware of the asbestos risk within our stock
- Ensure that all legal duties are fulfilled
- Sign the Contractor Declaration, Appendix 1.

**2.0 How We Deliver**

Where suspect ACMs are discovered in a property at any time, either by contractors, staff or occupants, tests will be instructed to confirm materials before any work is undertaken.

**2.1 Survey Strategy**

We routinely conduct a range of Surveys to help identify ACM risk:-

- Stock Condition Surveys – Staff conduct around 120 property surveys each year to ensure our Stock Information Database is robust and ensure compliance with the Scottish Housing Quality Standard.
- Void Inspection Surveys - Approximately 80 surveys are carried out each year as properties become vacant.
- 5 yearly Stock Condition Survey by independent consultants - A 10% sample survey of all stock to assess housing condition, validate our Stock Information Database and compliance with SHQS
- Pre contract surveys for Cyclical, Planned and Adaptation works – A 20% sample survey of all house types undergoing work. Conducted by specialist asbestos testing companies to carry out tests at sample areas throughout the property depending on the nature of the work.

As part of the pre-contract preparation work and in accordance with Construction Design & Management Regulations, we will instruct the contractor to undertake a 20%

intrusive survey sample of property types to risk assess for ACMs before commencing work.

## **2.2 Asbestos Training and Awareness**

All association staff have completed and passed a UCAT approved Asbestos Awareness Course (November 2012) to enhance their awareness of asbestos. This training will be refreshed every three years.

## **3.0 Dealing with Asbestos or suspect ACM**

### **3.1 On-Going Management**

The Head of Development & Contracts will conduct annual inspections of ACMs to assess the condition and any deterioration for on-going management arrangements. Results will be updated on the Asbestos Register.

The Repairs Administrator will maintain the Asbestos Register with asbestos test results from reactive work and 'Red Flag' the property details where ACM is confirmed.

The Head of Development & Contracts will ensure that Cyclical & Planned maintenance asbestos test results are incorporated into the Asbestos Register.

Physical surveys of properties continue to be recorded and entered into our Stock Information Database. These surveys, help identify the presence of potential asbestos containing materials, such as artex, and will be subject to specialist testing.

Where asbestos is identified and it is:-

- in good condition; and
- is not likely to be damaged; and
- is not likely to be worked on;

It will be left in place, recorded for on-going inspection in the asbestos register and managed through the inspection process.

### **3.2 Asbestos Removal**

Before a decision to remove asbestos is made, we will consider;

- Whether the asbestos is preventing some other maintenance activity from proceeding without causing serious disturbance.
- Whether it is subject to mechanical damage and regularly having to be reassessed.
- Whether it is in a loose and very friable condition.

The decision on whether the material should be removed or encapsulated will be made by the Head of Development & Contracts, based on the asbestos test results and recorded in the Asbestos Register.

Specialist asbestos removal companies will undertake the removal of Medium and High risk ACMs. We will ensure that any work on asbestos containing materials, will

be undertaken by a Health and Safety Executive (HSE) Licensed Contractor, irrespective of the expected duration of the work and the nature and size of asbestos material involved.

Prior to any removal work commencing, a detailed Method Statement is required by the licensed contractor for approval by The Head of Development & Contracts. This includes the control measures, procedures for the disposal of waste and all monitoring arrangements, including air monitoring.

Any waste containing asbestos can only be disposed of at licensed sites. The Head of Development & Contracts will check to ensure compliance with the Method Statement is achieved and all appropriate certification is received.

#### **4.0 Review**

The Board will review this policy every three years or earlier if there are any legislative changes.

#### **5.0 Regulatory Standards**

The undernoted Regulatory Standards are applicable to this policy and have been considered in its development.

Standard 2: We are open about and accountable for what we do. We understand and take account of the needs and priorities of our tenants, service users and stakeholders. Our primary focus is the sustainable achievement of these priorities.

2.2. The governing body recognises it is accountable to its tenants. It is open about what it does, publishes information about its activities and, wherever possible, agrees to requests for information about the work of the governing body and RSL.

Standard 4: The governing body bases its decisions on good quality information and advice and identifies and mitigates risks to the organisation's purpose.

4.1 The governing body ensures it receives good quality information and advice from staff and, where necessary, expert independent advisers, that is timely appropriate to its strategic roles and decisions. The governing body is able to evidence its decisions.

**Appendix 1 – Contractor Declaration**

**Shire Housing Association Ltd expects all Contractors working on its premises to:**

- Read and understand Asbestos related information provided by The Association for the purposes of planning and prior to commencing work.
- Ensure all operatives carrying out work on site have been made aware of the Asbestos Register and any additional Asbestos surveys carried out.
- Be able to demonstrate that all operatives, inclusive of sub- contractors, have been given asbestos awareness training and induction. This can be demonstrated on production of their individual training certificate if requested.
- Cease work upon discovery of suspect ACMs and ensure work environment is left in a safe condition. Report the discovery of suspect ACMs immediately to the Association.
- Await the outcome of the results of any Asbestos surveys undertaken to identify the materials and the instruction of the Association prior to re-entering the area.

Signed.....

Date.....