



REIDVALE HOUSING ASSOCIATION

Asbestos Management Policy

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Author	Maintenance Manager

POLICY SUMMARY

Purpose:	The purpose of this policy is to set out Reidvale Housing Associations position in relation to identifying and managing asbestos.
Legislation/Guidance:	The Association is a company under the Co-operative and Community Benefit Societies Act 2014, and a company regulated by the Financial Conduct Authority (FCA). Statutory Guidance The Scottish Social Housing Charter Requirements of the Scottish Housing Regulator
Regulatory Compliance	Standard 1: The governing body leads and directs the RSL to achieve good outcomes for its tenants and other service users. Standard 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. Standard 4: The governing body bases its decisions on good quality information and advice and identifies and mitigates risks to the organisation's purpose.
Linked policies	Maintenance Policy, Adaptations Policy, Void Management Policy
Financial Impact	Low
Risk Assessment	Medium
Equalities Impact Assessment	Yes
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1. INTRODUCTION

- 1.1 This policy sets out Reidvale's position in relation to identifying and managing asbestos.
- 1.2 Reidvale recognises the possible presence of asbestos within some of the properties under our control. To help manage this risk an effective asbestos management policy and associated plan need to be in place to manage the risks to tenants, residents, contractors and staff. The presence of Asbestos Containing Materials (ACMs) does not in itself represent a danger. However, asbestos is hazardous when damaged or disturbed and must be treated accordingly. Activities which give rise to airborne dusts e.g. breaking, sawing, cutting, and drilling asbestos containing materials are the most likely to present risks.

2. AIMS AND OBJECTIVES

- 2.1 The primary aim of the Policy is to ensure that Reidvale safely manage our properties and do not constitute a risk to the household, visitors to the property or to other residents.
 - 2.2.1 The objectives of this policy are to:
 - Effectively manage and control all ACMs across our properties
 - Reduce the asbestos related risks to as low as possible
 - Ensure the health, safety and welfare of any persons visiting, working in or living in our properties

3. LEGAL AND REGULATORY FRAMEWORK

- 3.1 Whilst this Policy sets out to explain Reidvale's approach to asbestos management it must do so in the context of legal and regulatory requirements. Therefore the following relevant legislation has been taken into account in the development of this Policy:
 - Control of Asbestos Regulations 2012
 - Health & Safety at Work Act 1974
 - Management of Health & Safety at Work Regulations 1999
 - Construction (Design and Management) regulations 2015

The following guidance documents have also been taken into account in the development of this Policy:

- HSG264 Asbestos: The Survey Guide

- HSG210 Asbestos Essentials
- L143 Managing and working with Asbestos

3.2 The Scottish Social Housing Charter

3.2.1 The Social Housing Charter came into effect in April 2012 and this sets the standards and outcomes that all social landlords should aim to achieve when performing their housing activities. The Charter replaces the Performance Standards and the outcomes relevant to this Policy are:

1. Equalities

Social Landlords perform all aspects of their housing services so that every tenant and other customer has their individual needs recognised, is treated fairly and with respect, and receives fair access to housing and housing services.

2. Communication

Social landlords manage their businesses so that tenants and other customers find it easy to communicate with their landlord and get the information they need about their landlord, how and why it makes decisions and the services it provides.

3. Participation

Social landlords manage their businesses so that tenants and other customers find it easy to participate in and influence their landlord's decisions at a level they feel comfortable with.

4. Quality of Housing

Social landlords manage their businesses so that tenants' homes, as a minimum, meet the Scottish Housing Quality Standard (SHQS) by April 2015 and continue to meet it thereafter, and when they are allocated, are always clean, tidy and in a good state of repair.

5. Repairs, maintenance and improvements

Social landlords manage their businesses so that tenants' homes are well maintained, with repairs and improvements carried out when required, and tenants are given reasonable choices about when work is done.

3.2.2 Social landlords are responsible for meeting the standards and outcomes set out in the Charter. The Scottish Housing Regulator is responsible for monitoring, assessing and reporting on how well social landlords, individually and collectively, achieve the outcomes.

3.2.3 In line with the regulatory principles, the Regulator's approach to monitoring landlords' achievement of the outcomes and standards in the Charter will be based on each landlord's performance information and their own assessment of their performance. Therefore, for each year ending on 30th September, we will be expected to:

- Measure and assess our performance in progressing towards or achieving the Charter outcomes and standards
- Provide the Regulator with some key performance information on our achievement of the outcomes and standards
- Report our performance to tenants and other service users who use our services.

4. REIDVALE'S RESPONSIBILITIES

4.1 Guidance HSG264 deals with the specific responsibilities for managing the risks from asbestos in non-domestic properties along with common parts of domestic buildings such as closes, bins stores etc. under the Control of Asbestos Regulations 2012. These regulations place responsibilities on Reidvale as a 'Duty Holder'. The requirements placed on the Duty Holder are to ensure that:

- All reasonable steps are taken to determine the location of materials likely to contain asbestos
- All suspicious materials are presumed to contain asbestos, unless there are good reasons not to do so
- A written record of the ACMs is made and maintained
- The condition of the ACM is assessed and monitored as required
- The risk of exposure from ACMs is assessed and necessary measures to manage the risk implemented
- All necessary steps are taken to see that the actions are carried out.

4.2 The Duty Holder (Reidvale) must manage the risk in the following ways:

- Keep and maintain an up to date record of the location, condition, maintenance and removal of all the ACMs within our stock
- Repair, seal or remove ACMs if there is a risk of exposure due to their condition or location
- Maintain ACMs in a good state of repair and regularly monitor their condition
- Have arrangements in place so that work which may disturb ACMs complies with the Control of Asbestos Regulations 2012
- Review the plan at regular intervals and make changes if circumstances change

4.3 The Control of Asbestos Regulations 2012 places a duty on Reidvale for non-domestic properties along with common parts of domestic buildings such as closes, bins stores etc. while the Health and Safety at Work Act 1974 places the responsibility of employers having to conduct their work so their employees will not be exposed to health and safety risks. Employers must also provide information to other people about their workplace which might affect their health and safety. Thus there is a requirement to pass information regarding asbestos to employees and contractors when working in any of our stock.

5. ASBESTOS MANAGEMENT PLAN

5.1 In order to assist with the control and management of ACMs within our stock an Asbestos Management Plan has been developed. This is appended to this Policy.

5.2 All properties will be subject to the Asbestos Management Plan.

6. ASBESTOS SURVEY AND REMOVAL CONTRACTORS

Reidvale will only employ UKAS Accredited surveyor/ organisation to undertake any surveys or removal works.

7. TRAINING

Staff involved in the delivery, procurement and organisation of works on behalf of Reidvale will be suitably trained to carry out their role in line with the requirements of this policy and the AMP.

8. PERFORMANCE MANAGEMENT

An annual summary of the number of properties known to contain asbestos along with the number and types of surveys carried out and details of any asbestos removal within the year will be prepared.

9. RISK MANAGEMENT

9.1 The management of asbestos safety represents risk to the Association in that:

- Failure to comply with relevant legislation may result in possible legal challenges including criminal proceedings
- The Association is required to have proper accessible documentation and is responsible for advising tenants, staff and contractors of the presence of asbestos containing materials.
- No staff of the Association work with asbestos in the process of removing or any associated downtakings of ACM's.

10. EQUALITY & DIVERSITY

Reidvale Housing Association is an equal opportunities organisation. We are committed to providing an environment of respect, understanding, encouraging diversity and eliminating discrimination. No person or group of persons applying for housing and housing services will be treated less favourably than any other persons or groups of persons because of their age, disability, gender reassignment, marriage and civil partnership, pregnancy or maternity, race, religion or belief, sex, or sexual orientation.

11. GDPR

Reidvale Housing Association will treat your personal data in line with our obligations under the current General Data Protection Regulation and our Privacy Policy. Information regarding how your data will be used and the basis for processing your data is provided in our Fair Processing Notice.

12. COMPLAINTS

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

13. POLICY REVISION

The Association undertakes to carry out a comprehensive review of all aspects of this policy at least every three years. The review will take account of legislative changes, new policy guidance, best practice advice and the views of service users.

Asbestos Management Plan (AMP)

The purpose of the Asbestos Management Plan (AMP) is to assist with the control and management of Asbestos Containing Materials (ACMs) within Reidvale's stock. All properties will be subject to the AMP.

1.0 Identification of Asbestos

- 1.1 Reidvale will increase the information held on our stock with regards to asbestos by carrying out surveys to establish the presence, location and type of asbestos contained within our properties.
- 1.2 Two different types of survey are available and the type is determined by the scale and type of work:

1.2.1 Management Survey

An asbestos management survey is a non-intrusive survey, which should be completed by a competent person and meet the criteria specified in Asbestos: The Survey Guide (HSG264). The surveyor completing this work is expected to be capable of determining the number of samples necessary in any given room based on the material, location and their experience. Management Surveys sample all readily accessible suspect materials and are generally commissioned in order to develop general information on the incidence of ACMs across housing the stock.

1.2.2 Refurbishment and demolition survey

If down-taking or intrusive maintenance work is planned, then a Refurbishment and Demolition Survey should be completed instead of a Management Survey.

Refurbishment and demolition surveys are undertaken where significant disruptive works will be carried out in properties. While this typically relates to demolition and major refurbishment works, the HSE have issued guidance stating that this type of survey should be undertaken in advance of planned improvement project e.g. kitchen and bathroom replacement projects. (Refurbishment & Demolition surveys sample all suspect materials, and are intrusive leading to damage to wall panels, floors, service risers etc).

Where improvement programmes are to be undertaken in the housing stock for example: kitchen and/or bathroom replacement programmes, a

representative sample number of Refurbishment & Demolition surveys will be carried out on each property type included in the project.

1.3 Surveys will be undertaken by a UKAS Accredited surveyor/ organisation and will identify and record the location, extent, condition and type of any known or presumed ACM.

1.4 Surveys will be carried out as follows:

- Management survey on void properties (built before 2000) when major works are being carried out and ACMs are suspected
- Management or Refurb/Demo survey on properties due for major repairs (built before 2000) where ACMs are suspected
- Management or Refurb/Demo survey on properties due for medical adaptations (built before 2000) where ACMs are suspected
- All common areas within closes/pend that we own/ manage
- Use of cloned data based on stock type, date of construction, refurbishment works carried out and previous survey information.

2.0 Management Strategy

2.1 Reidvale will appoint a suitably qualified contractor to carry out asbestos surveys and assess the risk in relation to ACMs by carrying out a material risk assessment and detailing:

- Property address
- Material type
- Location
- Damage
- Surface treatment
- Asbestos type
- Recommendations to remove/ monitor/ label/ manage

2.2 Each ACM is assigned a score to reflect its asbestos type, condition and surface treatment. This informs the categorisation of the potential for fibre release. The survey makes recommendations and assigns a priority category to the ACM.

2.3 The asbestos register forms the basis of the asbestos management plan. Survey results (including negative results) will be recorded on the asbestos register by the Maintenance Officer/ Maintenance Assistant and a copy of the report saved in the relevant housefile. Where no information regarding ACMs is available e.g. areas that could not be accessed during a survey it

must be presumed that ACMs are present and the register will reflect this. Details are also logged onto the pop ups warning screen of Kypera. As a further back-up Reidvale and all contractors have access to our Asbestos contractors Environtec's on-line portal were access to all our properties and surveys can be accessed.

2.4 It is not the policy of Reidvale to remove ACMs that are in good condition and present insignificant risk to the health of the building occupants, however we recognise the need for flexibility where there is a case made for specific removal.

2.5 If Reidvale decides to leave the asbestos in situ then it will:

- Log the details on the register/ pop up and refer user to survey which will include details on the location of the area with ACM areas highlighted.
- Ensure that all tenders for planned and cyclical works include reference to the Control of Asbestos Regulations 2012 and the asbestos register.
- Work orders for reactive repairs will highlight areas of ACM.

Damaged ACMs will be made safe either by sealing, encapsulating or by removing the ACM entirely. The asbestos register will be updated to reflect the action taken.

2.6 Communicating with our Contractors

Prior to any work being instructed and carried out in properties owned managed by Reidvale, the Asbestos register must be consulted and information in relation to ACMs communicated to contractors. This will be a standard line on our work orders.

2.7 Contractors Responsibilities

2.7.1 Contractors (including sub-contractors) working for Reidvale are responsible for ensuring that all employees under their control reference the Asbestos Register and understand its content and actions required. They are also responsible for ensuring all employees under their control work in line with Reidvale's Asbestos Policy and Management Plan.

2.7.2 Prior to starting a job if a contractor suspects the presence of asbestos they must not start it and contact Reidvale for advice. If the property has not been previously surveyed the job must be postponed until a survey is carried out.

2.7.3 When, during the course of any work, asbestos or material suspected of being asbestos, not identified by the asbestos register is discovered, the contractor will ensure that:

- All work is stopped in the area;
- All persons are removed and kept out of the immediate vicinity without causing undue concern,
- The area is closed, sealed or locked off (where practicable.)
- Any equipment or materials are left in place. These will require to be disposed of as special waste depending on the result of sampling.
- A warning sign(s) with the following, or similar, wording: 'POTENTIAL ASBESTOS HAZARD - KEEP OUT' is prepared and prominently displayed. Where this is not deemed appropriate to use this type of wording alternative strict entry prohibition notices will be used.
- The Maintenance Manager is immediately notified.
- Arrangements are made for the suspected ACM to be sampled by a competent Asbestos Surveyor and analysed by a UKAS Accredited Laboratory.

2.7.4 Communicating with our Tenants

Where asbestos materials are identified, are in good condition and remain in situ, tenants will be provided with relevant information.

2.8 On-Going Monitoring

- 2.8.1 All asbestos records and procedures must be regularly monitored and reviewed. It is imperative that all asbestos documents are kept up to date and are accessible. The asbestos register which, is an excel spreadsheet and the individual asbestos reports are located within the electronic files. These records are backed up with access to Environtec's on-line portal.
- 2.8.2 The register is set up to be read only for the majority of staff. Editing permissions are set for the Maintenance Officer, Assistant Maintenance Officer, Maintenance Assistant and Maintenance Manager.
- 2.8.3 Any changes to the condition and location of any known or suspected ACMs must be recorded on the asbestos register and associated files. Similarly any removal work must be recorded.

2.9 Identification of damaged or disturbed suspect material

It is the responsibility of staff and contractors to report to Reidvale if they suspect that disturbed or damaged ASBs may be present in a building owned or managed by Reidvale. Where this is suspected the following applies:

- Immediate contact with a licensed asbestos survey/ contractor to identify if the material contains ACMs

- Where damage to any material known to contain asbestos has taken place and is likely to give rise to airborne respirable fibre release, the area must be isolated pending air monitoring tests being carried out. Air monitoring tests will determine the level of any potential contamination, or provide reassurance that unacceptable contamination has not occurred.
- Details of air test results will be made available for record purposes
- Remedial action will only be required when airborne fibre levels exceed levels as stated in the 2010 Health & Safety Guidance (HSG) 264 guidance
- When remedial action becomes necessary after exposure, the relevant facts may have to be reported to the HSE in accordance with RIDDOR. Advice may be sought from a licensed asbestos survey contractor to determine whether the incident is in fact RIDDOR reportable.

3.0 Review

The AMP will be reviewed annually to ensure it continues to reflect current thinking and practice and to comply with legislative requirements and regulatory guidance.