



HS-POL-06 Asbestos Policy

Version Number	4	Developed by	Assistant Director of SHEQ
Approval Date	19/12/23	In Consultation With	Health & Safety Manager Property Services Manager
Classification Type - (Confidential, Restricted, Internal use only, None)			Internal use only

Contents

- Introduction & Aim
- Guiding Principles
- Definitions
- Health & Safety Implications
- Policy Statement
- Surveys
- Management Surveys
- Refurbishment and Demolition Survey
- Asbestos Register
- Survey Report
- Removal Works
- Re-inspection of Identified Asbestos Containing Materials 10
- Emergency Fibre Release
- Employee Training
- Information for Service Users



HS-POL-06 Asbestos Policy

1. Introduction & Aim

The Asbestos Management Policy details how Framework fully complies with the Control of Asbestos Regulations (CAR) 2012. In addition to this Policy, Framework maintains an Asbestos Register which holds the records of any property in which there is Asbestos Containing Material (ACMs) and a Management Plan that documents the controls in managing asbestos safely.

Framework recognises the risks associated with asbestos and acknowledges its responsibility to reduce the exposure to asbestos fibres of its employees, tenants, contractors and other people affected by its activities so far as is reasonably practicable. To achieve this, Framework has implemented a programme of actions identifying, recording, and managing asbestos (including safe working arrangements) in properties it controls, undertaking this in a planned and rational manner based on risk assessment. Due to levels of risk and high turnover of properties, we treat communal and domestic areas in the same way. However, Framework also notes that asbestos containing materials (ACMs) form an integral and important part of many premises and if well-maintained do not present any threat to health.

Framework will follow a systematic approach to the management of asbestos to ensure it meets the requirements set out in the Control of Asbestos Regulations 2012 and other relevant legislation. This is to ensure the safety of employees, tenants, contractors and other persons and stakeholders.

2. Guiding Principles

Framework is also required to ensure that any work with asbestos carried out in its premises is conducted in accordance with the Control of Asbestos Regulations 2012. To ensure this is the case all contractors employed by Framework to carry out asbestos removal works are to issue detailed method statements for approval prior to commencement of works. Framework has a duty to manage the potential risk posed by asbestos that may be present in its properties in line with the Control of Asbestos Regulations. The potential risk will be managed by:

- Finding out if there is asbestos in the premises, its amount and what condition it is in.
- Presuming that materials contain asbestos, unless there is strong evidence that they do not.
- Making and keeping an up-to-date record of the location and condition of the ACMs (asbestos containing materials) or presumed ACMs in premises (The Asbestos Register).
- Assessing the risk from the material.
- Preparing a plan that sets out in detail how the risk from this material will be managed.
- Taking any necessary steps to implement the plan.
- Reviewing and monitoring the plan and its implementation.
- Providing information on the location and condition of the material to anyone who is liable to work on or disturb it.
- Only employing suitably qualified and accredited contractors to work on ACMs and requiring detailed method statements for approval prior to the start of any applicable works.



HS-POL-06 Asbestos Policy

This Policy applies to all persons (service users, staff, members of the public and contractors) who may be affected by asbestos containing materials in Framework occupied premises or by the use of Framework's equipment in these premises. It also applies to all activities when employees and/or contractors undertake works at Framework occupied premises.

3. Definitions

3.1 Asbestos - Asbestos is a term used for a number of naturally occurring minerals which have crystallised to form long thin fibres and fibre bundles. The fibres have high tensile strength, and chemical, electrical and heat resistance, and were widely used for these properties; either raw (e.g. asbestos textiles and insulation packing's), or more often, combined with other materials (fireproofing's, insulations, boards, asbestos cement sheets etc.). There are six regulated types of asbestos, the three main types being – chrysotile, amosite and crocidolite, which were widely imported and used in the UK. These are also referred to as white, brown and blue asbestos respectively.

The other three types of regulated asbestos are fibrous actinolite, fibrous tremolite and fibrous anthophyllite, although these were less commonly used.

3.2 Asbestos Containing Materials (ACM's) – Any materials proven or presumed to contain asbestos fibres within its construction.

3.3 Asbestos Register – A centralised register of all assets detailing whether they have been surveyed for asbestos and, if so, detailing the application in that property.

3.4 Competent Person – Any person contracted or employed to carry out asbestos related work must be competent and have a suitable level of training and experience to undertake the task in a safe manner and leave the equipment or system in a safe condition. The level of competency required will vary according to the task to be completed.

3.5 Duty holder - (Property Services Manager) - A designated person who has responsibility for the maintenance of the premises and the systems within it. The duty holder must manage the risk from asbestos on the premises.

3.6 Risk Assessment - Identifying and assessing the risk from asbestos from work activities on premises and determining any necessary precautionary measures.

4. Health & Safety Implications

The Control of Asbestos Regulations 2012 requires employers to prevent the exposure of their employees to asbestos, or where this is not practicable, to reduce the exposure to the lowest possible level. The Control of Asbestos Regulations includes a regulation placing a duty on those who have repair and maintenance responsibilities for premises, because of a contract or tenancy, to manage the risk from asbestos in those premises. Where there is no contract or tenancy the person in control will be the duty holder. There is also a duty of cooperation on other parties.



HS-POL-06 Asbestos Policy

There are specific legal duties under regulation 4 of The Control of Asbestos Regulations 2012 and the broad requirements on employers and others are to:

- take reasonable steps to find materials likely to contain asbestos
- presume materials contain asbestos, unless there is strong evidence to suppose they do not
- assess the risk of the likelihood of anyone being exposed to asbestos from these materials
- make a written record of the location and the condition of the ACMs and presumed ACMs and keep it up to date
- repair or remove any material that contains or is presumed to contain asbestos, if necessary, because of the likelihood of disturbance, and its location or condition
- prepare a plan to manage that risk and put it into effect to ensure that:
 - information on the location and condition of ACMs is given to people who may disturb them during work activities
 - any material known or presumed to contain asbestos is kept in a good state of repair;
- monitor the condition of ACMs and presumed ACMs
- review and monitor the action plan and the arrangements made to put it in place

Although asbestos is a hazardous material, it can only pose a risk to health if the asbestos fibres become airborne and then inhaled. ACMs only release fibres into the air when they are disturbed. If Framework maintains all your ACMs in good condition, they cannot release fibres and put the health of its workers or others at risk. ACMs are disturbed:

- during any direct action on them, e.g. drilling, boring, cutting, breaking, smashing, etc
- during their removal
- during the demolition of buildings containing them
- through minimal, but repeated damage, e.g. an unprotected asbestos insulating board panel on the back of a door which is continually being accidentally knocked or scraped
- when damaged asbestos, e.g. damaged pipe insulation or sprayed asbestos on beams/columns, is subject to mechanical vibration and/or strong air currents
- during any other action that causes the ACM to be disturbed.

Breathing high concentrations of asbestos fibres can lead to asbestos-related lung diseases, mainly cancers, which kill more people than any other single work-related illness. The disease can take from 15–60 years to develop – so the person who breathes in asbestos fibres will not be immediately aware of a change in their health.

There is no cure for asbestos-related diseases.

5. Policy Statement

Framework and its management have a duty, so far as is reasonably practicable; to ensure that there is a management regime for the Identification, operational management and removal of asbestos containing materials. Framework has a number of different arrangements in relation to the properties that they occupy.

The accountability for the management of asbestos safety is devolved to the Property Services Manager with overall control of the buildings. Framework, however, retains a duty of care in relation to the management of asbestos safety.



HS-POL-06 Asbestos Policy

Framework Housing Association undertakes to:

- At all times comply with the Control of Asbestos Regulations 2012.
- Take all reasonable efforts to ensure asbestos is managed effectively in the properties where it has a statutory duty, and take all reasonable steps to provide a safe working environment for tenants, staff, contractors and any other persons likely to be affected where asbestos-containing materials may be present.
- Ensure that appropriate technical expertise is available.
- Ensure that suitable and sufficient asbestos surveys to identify asbestos are undertaken of the Housing stock.
- Implement and maintain the Asbestos Register and Asbestos Management Plan, to effectively protect service users, staff and contractors.
- Undertake routine inspections of asbestos risks, on a priority principle, and review management plans at suitable intervals.
- Ensure a Refurbishment or Demolition Survey be conducted at the earliest opportunity where any refurbishment works are proposed, so that sufficient time and resources can be put in place to control the risk.
- Monitor compliance with this procedure, which will be directed by Property Services.
- Ensure an Asbestos Management Plan (AMP) is in place supported by a detailed property Asbestos Register ensuring this is maintained and updated..
- Ensure asbestos removal contractors and other contractors and asbestos consultants are competent to work in accordance with Regulation 10 of the Control of Asbestos Regulations 2012.
- Only appointed Asbestos Surveyors and Contractors have the appropriate accreditation and that individual Surveyors are properly trained and competent.

6. Procedures

6.1 Asbestos Surveys

Surveys are to be completed following the information provided in HSG264 Asbestos: The Survey Guide.

The purpose of the survey is to help manage asbestos in Frameworks premises. The survey has to provide sufficient information for: an asbestos register and plan to be prepared, a suitable risk assessment to be carried out and a written plan to manage the risks to be produced.

The survey will have three main aims:

- it must as far as reasonably practicable locate and record the location, extent and product type of any presumed or known ACMs.
- it must inspect and record information on the accessibility, condition and surface treatment of any presumed or known ACMs.
- it should determine and record the asbestos type, either by collecting representative samples of suspect materials for laboratory identification, or by making a presumption based on the product type and its appearance etc.

The duty to manage requirement in Control of Asbestos Regulations 2012 regulation 4 allows materials to be 'presumed' to contain asbestos. Therefore in the asbestos survey, materials can be presumed to contain asbestos. There are two levels of 'presumption':



HS-POL-06 Asbestos Policy

1. Strong presumption: in this case the material looks as if it is an ACM, or that it might contain asbestos. This conclusion can be reached through visual inspection alone by an experienced, well-trained surveyor, familiar with the range of asbestos products.
2. A 'default' situation where a material is presumed to contain asbestos because there is insufficient evidence (e.g. no analysis) to confirm that it is asbestos free, many non-asbestos materials will also be presumed to contain asbestos using this system. There is a further default situation where materials must be presumed to contain asbestos. The default applies to areas which cannot be accessed or inspected. In this situation any area not accessed or inspected must be presumed to contain asbestos, unless there is strong evidence that it does not.

In line with information provided in HSE publication Managing and Working with Asbestos, Approved Code of Practice L143; Properties built after 1st January 2000 will be considered free of asbestos therefore will not require any type of asbestos survey. However workers in such premises should always be vigilant.

The type of survey will vary during the lifespan of the premises and several may be needed over time. A management survey will be required during the normal occupation and use of the building to ensure continued management of the ACMs in situ. A refurbishment or demolition survey will be necessary when the building (or part of it) is to be upgraded, refurbished or demolished. It is probable that at larger premises a mixture of survey types will be appropriate, eg a boiler house due for demolition will require a refurbishment/demolition survey, while offices at the same site would have a management survey. In later years refurbishment surveys may be required in rooms or floors which are being upgraded. In sectors where there are large numbers of properties (eg domestic houses) or internal units (e.g. hotels), only particular rooms may be specified for upgrading, eg kitchens, bathrooms and bedrooms. Refurbishment surveys would only be necessary in these locations.

6.1.1 Management Surveys

A management survey is the standard survey. Its purpose is to locate, as far as reasonably practicable, the presence and extent of any suspect ACMs in the building which could be damaged or disturbed during normal occupancy, including foreseeable maintenance and installation, and to assess their condition.

Management surveys will often involve minor intrusive work and some disturbance. The extent of intrusion will vary between premises and depend on what is reasonably practicable for individual properties, i.e. it will depend on factors such as the type of building, the nature of construction, accessibility etc. A management survey will include an assessment of the condition of the various ACMs and their ability to release fibres into the air if they are disturbed in some way.

Surveyors will always endeavour to positively identify ACMs. A sufficient number of samples should be taken to confirm the location and extent of ACMs. It is legitimate to reduce sample numbers where materials can be strongly presumed to be ACMs.

Management surveys should cover routine and simple maintenance work. However, it is recognised that where 'more extensive' maintenance or repair work is involved, there may not be sufficient information in the management survey and a refurbishment and demolition survey will be needed.



HS-POL-06 Asbestos Policy

6.1.2 Refurbishment and Demolition Survey

A refurbishment and demolition survey is needed before any refurbishment or demolition work is carried out. This type of survey will be used to locate and describe, as far as reasonably practicable, all ACMs in the area where the refurbishment work will take place or in the whole building. The survey will be fully intrusive and involve destructive inspection, as necessary, to gain access to all areas, including those that may be difficult to reach.

A refurbishment and demolition survey may also be required in other circumstances, e.g. when more intrusive maintenance and repair work will be carried out or for plant removal or dismantling.

6.13 Asbestos Register

The Asbestos Register collates asbestos related information using available information sources e.g. plans, work reports, surveys, pre development reports and will be maintained by the Property Services Manager via the C365 system.

Where information is incomplete or unavailable the Property Services Manager will utilise the services of a suitably UKAS accredited consultant to undertake a Management or Refurbishment & Demolition survey of the property as necessary.

A copy of the asbestos register will be made available to contractors who may undertake work affecting the fabric of the building of any fixtures or fittings that may contain asbestos. In order to minimise/control risks posed by asbestos the Register will be consulted prior to issuing contracts or orders for work where the fabric of the building is affected.

Where doubt exists about the presence of asbestos in a material, it will always be presumed it contains asbestos unless there is strong evidence, through sampling and analysis to prove it does not. Some materials obviously do not contain asbestos, such as glass, solid wooden doors, floorboards, bricks and stone.

If asbestos is presumed to be present, the UKAS accredited surveyor will assess the risk of fibres being released into the air, taking into account the condition of the material and how likely they are to be damaged or disturbed.

6.1.4 Survey Report

The survey report is a record of the information collected at a particular time on the presence and condition of ACMs. The report will be completed in a written format, supplied as a hard copy and as an electronic document. The survey report will contain but not be limited to the following sections:

- executive summary.
- introduction covering the scope of work.
- general site and survey information.
- survey results (including material assessment results).
- conclusions and actions.
- Bulk analysis results.

The surveyor will clearly set out their recommendations any further actions on the discovery of asbestos containing materials. This may be remedial measures such as encapsulation, identification with notice stickers and management or removal.



HS-POL-06 Asbestos Policy

6.2 Removal Works

The Property Services Manager in commissioning removal, treatment or encapsulation of asbestos containing materials shall only use competent removals contractors licensed by the HSE for this type of work or consultants accredited by UKAS. Works to low risk materials can be undertaken by non-licensed contractors where they have the relevant experience and can demonstrate competence and method statements are approved.

Contractors appointed shall comply fully with the following requirements as relevant:

- The terms of their license/accreditation.
- Control of Asbestos Regulations 2012.
- ACoP L143 'Work with materials containing asbestos.'
- HSG 247 'Asbestos: The licensed contractors'.
- Relevant requirements set out in HSG264 'The Survey Guide'.
- HSG 227 'A Comprehensive Guide to Managing Asbestos in Premises'
- HSG 248 'The analysts' guide for sampling, analysis and clearance procedures.'
- HSE (COSHH Essentials) 'Working with Asbestos in Buildings'.
- Asbestos Essentials Task Manual HSG210.
- Introduction to Asbestos Essentials HSG 210 and associated advice and/or equipment & method sheets.

6.3 Re-inspection of Identified Asbestos Containing Materials

Asbestos Containing Materials identified to any property shall be re-inspected in accordance with a determined inspection regime as shown by the recommendations made by the surveyor, to ensure that the original assessment of these materials is still relevant, that any associated risks have not altered and the recommended management action for these materials are still valid.

The risk assessment for individual ACMs shall dictate the frequency at which they are re-inspected. The material risk assessment and register shall be revised and the frequency of re-inspection increased, when a material shows signs of deterioration or damage. Re-inspections shall only be conducted by personnel deemed competent to do so by the Duty Holder. Any such person nominated must have sufficient training, knowledge and understanding of ACMs to be able to do this effectively on behalf of the Duty Holder. The initial re-inspection surveys may be undertaken by nonintrusive visual inspection against the previous survey information. Should any change be apparent to the condition of any individual ACM, this will then be subject to further survey by an accredited surveyor.

All scheduled re-inspection work will be collated within the Asbestos Register.

7. Emergency Fibre Release

Anyone suspecting that an ACM has been disturbed resulting in potential asbestos fibre release, will immediately follow the following procedure:

- Stop work
- Report the incident immediately to Framework's Health and Safety Manager clearly stating that there is a suspected asbestos incident.
- Evacuate the area without causing unnecessary alarm or potential spread of asbestos fibre, cordoning off/securing the area until a full assessment has been completed.
- Prohibit access to the area, including barriers and signage, informing the person in charge of the premises.
- Record if possible, the names of all persons potentially affected.



HS-POL-06 Asbestos Policy

- Make an accurate written record of the incident as soon as possible.
- Ensure that personal safety is maintained at all times by not entering any potentially contaminated area.
- Property Services will instigate an asbestos survey, sampling and analysis of the area.

8. Employee Training

Training appropriate to role will be given to Framework employees in order that they are equipped with the necessary skills, knowledge and understanding about asbestos and issues surrounding ACM's to be dealt with safely and in full accordance with this policy. Employees will be given relevant training based on an assessment of their needs.

Framework contractors will have as a minimum asbestos-awareness training for all personnel who are identified as being liable to be exposed to asbestos. This course must be refreshed annually.

Any employee or contractor who is assigned to work with asbestos **MUST** be appropriately trained and competent. Framework employees whose work could reasonably be expected to expose them to asbestos or who may be involved in directly managing asbestos programmes of work may also be required to attend relevant additional training.

9. Information for Service Users

Framework will provide to new service users moving into a property, where asbestos containing materials are known or presumed, information on the location and health & safety implications of the material.