

# ASBESTOS MANAGEMENT POLICY

25 July 2023

Prepared by:	Andrew Brown
Date effective from:	25/07/2023
Policy approved by:	OMT
Review Date:	01/07/2025

EIA Required?	<input type="checkbox"/>
EIA Completed?	<input type="checkbox"/>
Revision number:	1
Lead officer:	Zoe Bate

## 1 INTRODUCTION

1.1 Stockport Homes Group (SHG) has a duty and a legal responsibility to ensure the effective and safe management of Asbestos containing materials within all buildings and properties under its control in order to protect employees, contractors, customers and members of the public from uncontrolled exposure to Asbestos.

1.2 SHG must take the necessary steps to ensure compliance with The Control of Asbestos Regulations (CAR) 2012 and the Health and Safety at Work Act 1974.

1.3 SHG recognises that to meet those responsibilities it must ensure that Asbestos within its buildings and properties is identified, recorded, communicated and safely managed.

1.4 It must also be ensured that employees responsible for Asbestos management, those responsible for the delivery of repairs and maintenance and those operatives and contractors carrying out the work are appropriately trained and Asbestos aware.

1.5 This policy should be read in conjunction with the Asbestos Management Plan (AMP) and the Asbestos Procedures for Staff and Contractors.

## 2 SCOPE

2.1 The scope of this policy seeks to explain SHGs approach to managing Asbestos as required under CAR 2012 and the Health and Safety at Work Act 1974.

2.2 The policy applies to all companies within the SHG, all SHG staff and customers, other organisations delivering services on behalf of SHG, including external repair and maintenance contractors, development contractors/consultants and the general public.

2.3 This policy applies to all buildings and properties constructed before 2000 that SHG has a maintenance and repair responsibility for, this includes those:

- Owned by SHG.
- Owned by the local authority that SHG have management responsibility for.
- That SHG are responsible for the maintenance of through a contract or tenancy agreement.
- Where is no formal contract but SHG has overall control of the building.

2.4 The types of buildings and properties affected are:

- Domestic properties, both single and multi-occupancy.
- Common areas of domestic premises (e.g., halls, stairwells, lift shafts, roof spaces, communal areas, circulation areas, bin stores, plant rooms, risers etc).
- Non-domestic premises (e.g., community buildings and offices).
- Any building classed as a workplace under the Health and Safety at Work Act 1974.

### **3 BACKGROUND**

3.1 Asbestos is a term for a group of minerals composed of fibres. The use of Asbestos Containing Materials (ACMs) was very common in the construction industry between the mid-1940s and late 1990s due to its fire protection and insulating properties. It is now banned in the UK however, buildings constructed before the year 2000 are likely to contain Asbestos, especially in insulation, flooring, roofs, ceilings, and walls.

3.2 When ACMs are damaged or disturbed microscopic Asbestos fibres can be released into the air and breathed into the lungs.

3.3 The human health effects from long-term Asbestos exposure are well documented. Asbestos fibres are easily inhaled and carried into the lower regions of the lung where they can cause fibrotic lung disease (Asbestosis) and changes in the lining of the chest cavity (Pleura). These diseases can lead to reduced respiratory function and death. Long-term prolonged inhalation of Asbestos fibres also increases the risk of Asbestos-related lung cancer and Mesothelioma.

### **4 OUR OBLIGATIONS**

- To adhere to the requirements of the duty to manage Asbestos contained within CAR 2012.
- To prepare and maintain a document that contains the strategy for management of Asbestos within the organisation – the Asbestos Management Plan (AMP).
- To identify where there is Asbestos in communal (non-domestic) premises, its extent, and its condition.
- To presume materials, contain Asbestos unless there is strong evidence that they do not.
- To maintain an up-to-date Asbestos register of the location and condition of identified or presumed ACMs in premises and ensure that this is available to anyone that will work on or may disturb it.
- To assess the risk posed by any ACMs in premises and prepare a plan that sets out in detail how the risks from these materials are to be managed. This plan should be reviewed and updated on a regular basis.
- To carry out periodic condition inspections of Asbestos in non-domestic premises.

- To ensure that all staff, operatives, and contractors that work with potential ACMs have received suitable, sufficient and regular training on the identification of ACMs, the hazards of Asbestos, how to plan works in such a way to avoid disturbing ACMs and know the steps to take to avoid the release of Asbestos fibres.
- To have in place emergency procedures to deal with inadvertent Asbestos disturbance/release.
- To ensure adequate resources are made available to manage Asbestos in line with regulations and the AMP.
- To put in place quality assurance and performance management arrangements to ensure that SHG meets its obligations.

## 5 STATEMENT OF INTENT

5.1 SHG will produce and maintain an AMP that details its approach to managing ACMs. This document will be reviewed on annual basis.

5.2 SHG will ensure that an Asbestos Management Survey is available for all non-domestic areas and premises that fall under the duty holder responsibility of SHG, this includes:

- Common areas of domestic premises (e.g., halls, stairwells, lift shafts, roof spaces, communal areas, circulation areas, bin stores, boiler rooms, plant rooms and risers etc).
- Non-domestic premises (e.g., community buildings, offices).

5.3 Though there is no regulatory requirement to survey 100% of domestic properties SHG considers it good practice and will work towards carrying out an Asbestos Management Survey to all its pre 2000 domestic properties where there is a repairs and maintenance responsibility

5.4 SHG will ensure that an up-to-date electronic register is maintained of the location and condition of identified or presumed ACMs. Access to this register will be made available to any staff or contractors that require it so that it can be interrogated before any works commence.

5.5 SHG will, upon request, furnish customers with relevant information about any known ACMs within their property so as to protect them from accidental disturbance/release. Asbestos awareness information will also be provided to customers at the start of a new tenancy and further guidance will also be available on the SHG website.

5.6 Where Asbestos is identified during a management survey if the material is in good condition and the material is unlikely to be disturbed no immediate action will be taken.

5.7 Any Asbestos identified on a management survey of non-domestic premises will form part of a periodic condition inspection programme, in line with Regulation 4 of CAR 2012. The frequency of inspection will be determined by the product, material, condition, and location.

5.8 Where work is to be carried out that will involve disturbing or intruding on the structure or fabric of the building or a room within a building, SHG will, as deemed necessary, carry out supplementary localised refurbishment surveys prior to work commencing.

5.9 All Asbestos surveys and condition inspections shall only be commissioned from independent surveying organisations accredited by UKAS ISO17020 and all samples will be analysed by a laboratory accredited by UKAS ISO17025.

5.10 Where Asbestos is found to be in poor condition or liable to be disturbed during normal building occupation or during repairs or refurbishment then it shall be removed under suitably controlled conditions by approved licenced contractors from SHG's procured Asbestos framework contractors.

5.11 Suitable and sufficient Asbestos awareness training and refresher programmes will be maintained for all relevant operatives and employees. See Section 8 for further details.

5.12 SHG will ensure that in the event of an accidental Asbestos disturbance/release that qualified advice and immediate remedial action is available 24/7.

## 6 CERTIFICATION

6.1 SHG shall ensure that all appropriate records and certification relating to the management of Asbestos are kept secure and up to date.

6.2 The records that are to be kept shall include (but are not limited to);

- An up-to-date list of properties under the control of SHG or where SHG have a responsibility for the safe management of Asbestos.
- All Asbestos survey reports and sampling records.
- All Asbestos periodic condition re-inspection records.
- The AMP.
- Records relating to all Asbestos monitoring, testing, inspection, treatment, removal, and disposal works.
- All Asbestos training records.
- All related Asbestos correspondence.

6.3 All Asbestos related activities and documentation will be in adherence with but not limited to the following:

- HSG264 (Asbestos: The Survey Guide).
- HSG247 (Asbestos: The Licenced Contractors' Guide).
- HSG248 (Asbestos: The Analysts' Guide).

## 7 KEY ROLES AND RESPONSIBILITIES

7.1 Under Regulation 4 (CAR 2012), SHG is considered the 'Duty Holder' for all non-domestic areas and premises under its control.

7.2 The Chief Executive and Board members have ultimate accountability and responsibility for the implementation of the Asbestos Policy, AMP, and associated procedures and for monitoring their effectiveness.

7.3 The Chief Executive will fulfil the role of 'Duty Holder' on behalf of SHG

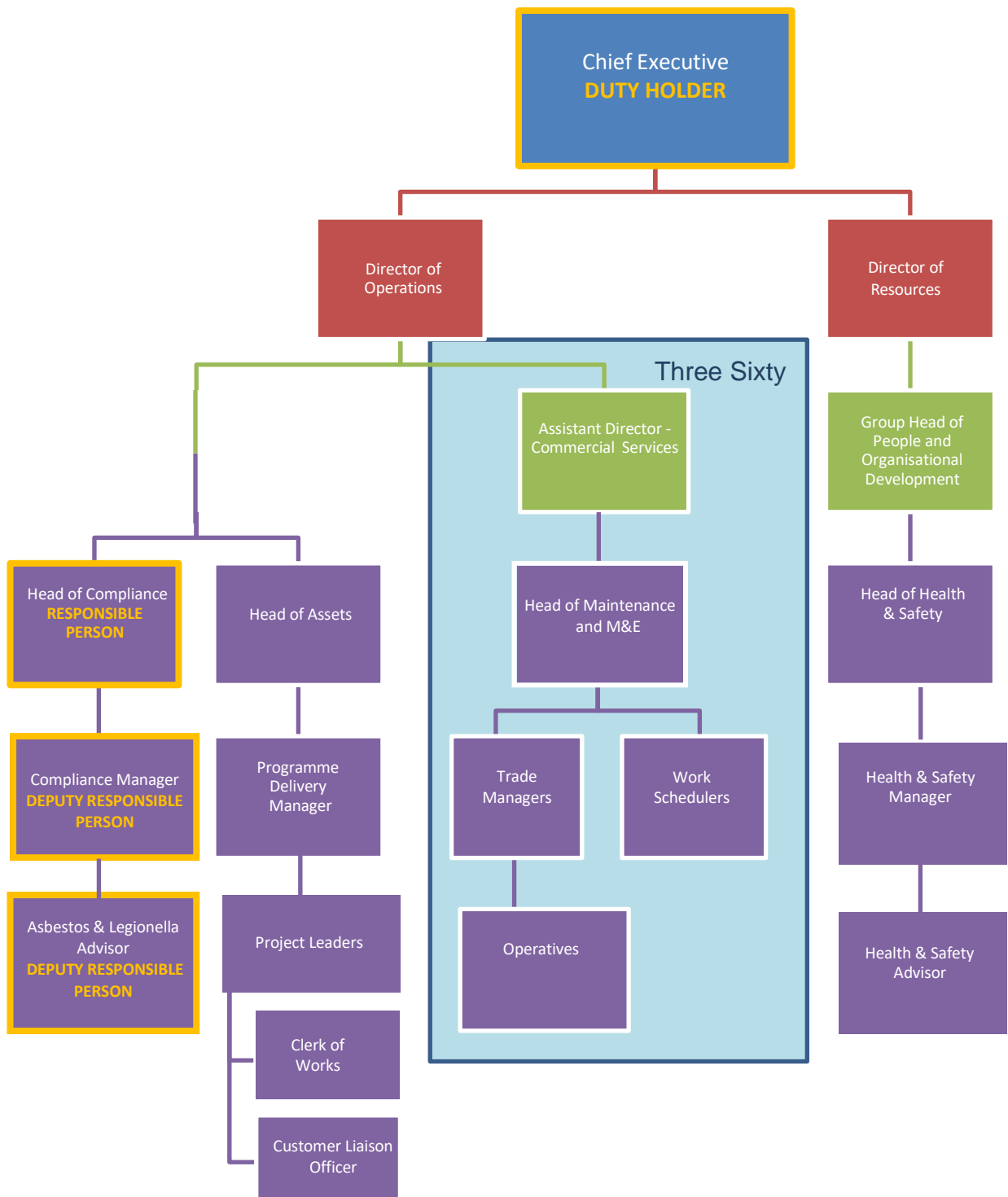
7.4 The Responsible Person for Asbestos management is the Head of Compliance.

7.5 The Deputy Responsible Persons for Asbestos management are the Compliance Manager and the Asbestos & Legionella Advisor.

7.6 Day to day delivery of Asbestos surveys and the AMP is by the Compliance Team - the staff responsible for delivery include:

- Asbestos & Legionella Advisor
- Compliance Manager
- Head of Compliance

7.7 There is however, also a responsibility on **all SHG** staff for the safe management of Asbestos. The below chart shows those roles which have the most significant day-to-day responsibility for the safe management of Asbestos due to their involvement in repairs and maintenance.



## 8 TRAINING

8.1 An annual Asbestos Awareness training programme will be delivered to all Three Sixty operatives and all staff that manage the delivery of works on site, e.g., Project Leader, Clerk of Works, Technical Officer, Site Managers, Trade Managers etc. The training programme will consist of a ½ day awareness training one year and then an e-learning awareness refresher the subsequent year and alternated each year thereafter.

8.2 Any new operatives or staff that deliver works that join the organisation without out any prior Asbestos awareness training will be asked to attend an accredited Asbestos awareness course to ensure an appropriate level of understanding and knowledge.

8.3 SHG will be proactive in ensuring the contractors they work with are able to demonstrate they have in place an Asbestos awareness training programme for their operatives and staff.

8.4 SHG's Responsible and Deputy Responsible Persons shall be trained to a minimum of BOHS P405 – 'The Management of Asbestos in Buildings'.

8.5 The Head of Compliance is also qualified in "Managing Asbestos in Buildings, the Duty Holder Requirements" and the Compliance Manager also holds the Certificate of Competence in Asbestos (CoCA).

## **9 COMPLIANCE PERFORMANCE**

9.1 Compliance with the Asbestos re-inspection programme is reported monthly to the Operations Management Team.

9.2 Monthly progress updates are also provided to the Operations Management Team on the number of domestic management surveys completed to date.

9.3 The Asbestos & Legionella Advisor and/or the Compliance Manager will carry out audits of a 5% of surveying works completed and 5% of remedial works. This approach is detailed further in the AMP.

## **10 EQUALITY IMPACT ASSESSMENT (EIA)**

10.1 An Equality Impact Relevance Screening has determined that an EIA is not required.

## **11 OWNERSHIP, MONITORING & REVIEW**

11.1 The policy will be monitored and reviewed in line with the Policy Review Group schedule to ensure that the policy reflects current regulation, guidance, and operating practices

11.2 Ownership of the policy lies with the Head of Compliance within the Compliance Team.

11.3 Any queries with the policy should be forwarded to the Head of Compliance and Asbestos team by email to [asbestos@stockporthomes.org](mailto:asbestos@stockporthomes.org)