



Asbestos Policy & Procedures August 2018

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1.0 Introduction

1.1 This document represents Queens Cross Housing Association's (QCHA's) commitment, in line with the Control of Asbestos Regulations 2012, to the management of asbestos in their managed properties. It sets out QCHA's overall policy relating to asbestos in their managed properties and describes the management plan required by Regulation 4 of the Control of Asbestos Regulations (CAR).

1.2 Throughout this document, reference is made to a number of publications. These, together with a list of other useful documents are detailed below:

- CAR Control of Asbestos Regulations 2012
- CDM Related ACOP, Managing and working with Asbestos, issued 2014
- HSWA Construction (Design and Management) Regulations 2007
- MHSWA Health & Safety at Work Act 1974
- EH 71 Management of Health & Safety at Work Regulations 1999
- HSG 210 Guidance Note EH 71 from the Health & Safety Executive. Working with Asbestos cement and asbestos insulating board.
- HSG 213 Asbestos Essentials Task Manual: Task Guidance Sheets for the Building and Allied Trades
- HSG 213 Introduction to Asbestos Essentials; Comprehensive Guidance on Working With Asbestos in Building and Allied Trades
- HSG 248 Asbestos: The analysts' guide for sampling analysis and clearance procedures. (Replaces EH10, MDHS39,MDHS77 and MDHS39/4)
- HSG 264 Surveying, Sampling and Assessment of Asbestos-Containing Materials 2012.
- INDG223 Managing asbestos in buildings: A brief guide

2.0 Policy

2.1 It is the policy of QCHA to take all necessary measures to ensure full compliance with the Control of Asbestos Regulations 2012. This includes the duty to manage any asbestos-containing materials (ACM) in such a manner as to prevent the exposure of their employees, residents and contractors to asbestos, or where this is not practicable, to reduce exposure to the lowest possible level.

2.2 This will include:

- Procedures for assessment of property stock for the risk of containing asbestos;
- Survey and assessment of those buildings deemed as presenting a risk of containing asbestos;
- Dissemination of information and details of training procedures;
- Overarching Management Plan for managing the risk of exposure to asbestos fibres
- The production of Plans of Work prior to any work involving the management of asbestos in QCHA properties; and
- The methods for prevention or reduction of exposure to asbestos fibres during such work.
- The methods for site clearance certification

3.0 Management of Asbestos

3.1 Responsibilities

- 3.1.1 Regulation 4 covers the duty to manage asbestos in non-domestic premises. It requires dutyholders to identify the location and condition of asbestos in non-domestic premises and to manage the risk to prevent harm to anyone who works on the building or to building occupants. It also explains what is required of people who have a duty to co-operate with the main dutyholder to enable them to comply with the regulation. Non-domestic premises includes the common parts of domestic premises.
- 3.1.2 The dutyholder will usually be determined by the degree of responsibility over the fabric of the property.
- 3.1.3 Persons holding any responsibility, either as dutyholder or nominated responsible persons must know the extent of their duties, have suitable competence and training.
- 3.1.4 Thus, there is an implicit necessity to have a clearly defined organisational structure giving details of the dutyholder and their full responsibility, depending on the terms of occupation of the property. There should be full details of any delegated responsibility, such as to facilities managers, maintenance staff and external consultants.
- 3.1.5 Provision should be made to ensure all people within the organisation are aware of their responsibilities and the responsibilities of others. Evidence of training requirements and provision should be included.
- 3.1.6 Roles and responsibilities are listed below:

Designation	Responsibility
Director of Property, Enterprise & Regeneration	Dutyholder. Ultimate accountability for policy.
Head of Property Services	Delegated responsibility for full implementation of policy.
Maintenance Manager	Dutyholders with delegated operational responsibility (DwDOR). Implementation and management of operational procedures for the management and control of asbestos during maintenance activities.
Investment Manager	Dutyholders with delegated operational responsibility (DwDOR). Implementation and management of operational procedures for the management and control of asbestos during investment activities.
Investment & Maintenance Teams	Implementation of operational procedures for the management and control of asbestos during projects and maintenance activities.

3.2 Information, Instruction and Training

- 3.2.1 Regulation 10 of the CAR requires that:

"...every employer shall ensure that adequate information, instruction and training is given to those of his employees who are or are liable to be exposed to asbestos, or who supervise such employees and [those] who carry out work in connection with the employer's duties."

To enable compliance with this Regulation, QCHA has undertaken to follow the procedures below:

Information

- 3.2.2 The primary method of dissemination of information employed by QCHA will be through the use of a bespoke asbestos management system (MODUS) which is web based and backed up on remote servers. A login will be maintained for all relevant staff and contractors.
- 3.2.3 The information contained in the management system will also be made freely available, on request, to the emergency services.
- 3.2.4 Information will be provided to residents upon the start of a new tenancy, with general information provided via leaflets and online.

Instruction and Training

- 3.2.5 Asbestos awareness training will be given to all the Association's staff who might inadvertently come into contact with asbestos materials in their day to day work, or who supervise such work.
- 3.2.6 Any member of the Association's staff who may have to carry out occasional minor work with asbestos will be trained in non-licensable work, which includes practical training. This extends to their immediate supervisor.

Permit to Work

- 3.2.7 QCHA recognises the value of employing a robust Permit to Work system, when dealing with premises containing ACMs, as key to preventing the accidental exposure of its employees and contractors to airborne asbestos fibres.
- 3.2.8 To this end, QCHA has undertaken to utilise the existing records of ACMs in their property portfolio. The Permit to Work system for work within properties containing asbestos will operate in such a way as to preclude the issue of a Permit without prior assessment of the records and acknowledgement of that information.
- 3.2.9 QCHA has undertaken to provide a contractors' information letter. This letter will be issued to all current approved contractors. This letter will contain information on how contractors should access QCHA's asbestos management system. On receipt of this letter the contractor's senior manager must sign the acknowledgement box and return a copy to the Maintenance Manager at QCHA. On receipt of this acknowledgement the Maintenance Manager will then permit the contractor to commence works on any site, with responsibility for all inspections of the registers prior to any works, placed upon the contractor.
- 3.2.10 Prior to approval of any future contractors for work on these sites a contractors' information letter will be issued.
- 3.2.11 If the planned work directly involves work on any identified or suspected ACM, a further Plan of Work, in accordance with the requirements of the CAR Regulations, will be produced. This is more fully discussed in Section 4.9.
- 3.2.12 In order to provide further information to Contractors carrying out works, QCHA will identify within issued Works Orders if ACM's are known to present within the area of work.

3.3 Assessment of Asbestos Containing Materials (ACM)

- 3.3.1 Regulations 4(3) to 4(5) of the CAR Regulations set out the requirements for assessment of the properties under the control of QCHA. These require that:

"the dutyholder shall ensure that a suitable and sufficient assessment is carried out as to whether asbestos is or is liable to be present in the premises."

Assessment of Property Portfolio

- 3.3.2 The first step of this assessment process is an initial assessment of the property stock, taking into account such factors as building age, type and use, together with an assessment of any existing records that may be pertinent.
- 3.3.3 QCHA has undertaken an initial assessment of their portfolio. This has enabled prioritisation of further, more detailed surveys of those properties deemed to be likely to contain asbestos.
- 3.3.4 QCHA has undertaken Management surveys of the common areas of domestic properties, as well as undertaking localised Refurbishment Surveys during capital investment and void works.
- 3.3.5 Any further acquisitions will be subject to this initial assessment process. This will enable prioritisation of further, more detailed surveys of those properties deemed to be likely to contain asbestos. Any such assessments will be completed on an 'as necessary' basis, upon acquisition of any further properties.

Assessment of ACM

- 3.3.6 Surveys of premises for the purposes of identification and assessment of ACM will be carried out in full accordance with the guidance set out in the HSE publication, HSG264 - Surveying, Sampling and Assessment of Asbestos-Containing Materials.
- 3.3.7 QCHA will ensure that appropriate sample Refurbishment / Demolition Surveys will be carried out prior to any demolition work or major refurbishment within properties with ACM.
- 3.3.8 QCHA will ensure that all external consultants and contractors working on such surveys utilise laboratory testing using appropriate experience and accreditation to either ISO 17025 or EN 45013. All Management asbestos surveyors used by QCHA will be trained to BOHS P402 standard.
- 3.3.9 QCHA carry out sample surveys of all materials within their buildings. These surveys enable QCHA to be aware of the exact location, extent and condition of all ACM in the properties that they have surveyed.
- 3.3.10 These sample surveys will be Management, and where appropriate, Refurbishment/ Demolition in line with all current regulations.
- 3.3.11 The findings of all surveys will be used for management purposes, to be defined in subsequent sections of this document. In addition, in compliance with the Regulations governing dissemination of information, QCHA will undertake to follow the procedures outlined in Section 3.2.
- 3.3.12 Existing survey reports include photographic evidence, laboratory analysis certificates and marked-up building plans (where available). These can be viewed on QCHA's asbestos management system.

Review

- 3.3.13 Regulation 4(6) of the CAR requires review of the assessments resulting from such surveys if there is any reason to suspect that assessment is no longer valid or if there have been significant changes to the property.

3.3.14 To this end, QCHA will undertake periodic re-inspections in accordance with the Risk Assessment Scores (RAS), with any changes recorded in the records. Additionally, there will be annual reviews by the Asset Legislation Compliance Team for the purposes of ensuring the management plan and survey records remain up to date and valid. The duty holder will ensure the conclusions of any reviews are recorded as described previously.

3.4 Assessment of Risk

3.4.1 Regulation 4(8), part (a) carries the requirement to undertake an assessment of the risk of exposure of persons to asbestos fibres. The assessment of risk will utilise the results of the Material Assessment Score (MAS) for the identified ACM. This will be provided by the surveyor.

3.4.2 QCHA will determine the priority for management of ACMs by assessing the likelihood of those materials being disturbed. This priority assessment will take into account such factors as;

- The location of the material
- Its extent
- The use to which the location is put
- The occupancy of the area
- The activities carried out in the area; and
- The likelihood/frequency with which maintenance activities are likely to take place

This will enable the production of a Priority Assessment Score (PAS) for management.

3.4.3 The full assessment of risk of exposure, will include both the MAS and PAS for each ACM identified. This is known as the Risk Assessment Score (RAS), and is the score from the addition of the MAS and the PAS.

$$\text{RAS} = \text{MAS} + \text{PAS}$$

3.4.4 Surveys and assessments on any subsequent acquisitions, QCHA will undertake to have completed both the PAS and the full risk assessment on each ACM on receipt of the sampling survey results.

3.4.5 Both the PAS and the results of the risk assessment will be recorded and made fully available as necessary in QCHA's asbestos management system.

3.4.6 The relevant DwdOR will ensure that the risk assessment process is undertaken within 10 working days of receipt of the survey report. This will also include the updating of QCHAs asbestos management system.

4.0 **Management Plan**

4.1 Following the requirement to comply with Regulation 4(8), part (c) to 4(10), QCHA has undertaken to implement a suitable plan for the management of all asbestos-containing materials within their properties. As each identified ACM in these properties is likely to have unique characteristics in terms of type of material, occupancy of area and so forth, it is not feasible to set out the management plan for each material in this document.

4.2 Rather, QCHA will utilise its asbestos management system. This system allows for any updating of the records relating to specific ACMs. However, as an over-arching management document, QCHA 's policy regarding planned management of ACMs is contained in this document, as follows:

4.3 The Plan

4.3.1 The scope of the Management Plan covers all areas of QCHA's premises for which they have responsibility, (with the exception of those that have been deemed as presenting no foreseeable risk of containing asbestos, i.e. those where construction commenced after 1/1/2000). The Plan will ensure that all necessary measures for controlling the risk of exposure are implemented

4.3.2 These measures will include, but are not limited to:

- Monitoring of the condition of identified and suspected ACMs,
- Ensuring information is disseminated as required,
- Review of the Management Plan, on a regular, planned basis, and with additional reviews if there is reason to believe it is no longer valid,
- Ensuring that measures specified in the Plan are implemented according to the Plan, and recorded in the Plan

4.4 Management of ACMs

Risk Assessment Scores (RAS)

4.4.1 QCHA has undertaken to conduct an assessment of the risk of exposure of persons to asbestos fibres for each location identified as containing or presumed to contain asbestos, following the survey carried out by their approved asbestos management consultants (as per Section 3.7). The results of this Assessment are contained in QCHA's asbestos management system.

4.4.2 The production of these risk assessment scores will enable the formulation of a structured plan for the management of ACMs at each property. A banding for these risk assessment scores are shown below:

Score (RAS)	Risk Rating	Action
0-3	Very Low	Re-inspect as directed
4-7	Low	Re-Inspect as directed, but within 12 months
8-10	Medium	Manage ACMs and carry out remedial actions to reduce the score at next refurbishment.
11-13	High	Manage ACMs and carry out remedial actions to reduce the score typically within 12 months.
14+	Very High	Manage ACMs and carry out remedial actions to reduce the score typically within 3 months.

4.4.3 Individual materials will require a specific written management scheme providing specific actions and proposals. This is provided, along with risk assessment scores in QCHA's asbestos management system. This will allow real-time review and amendment of each material identified.

Specific Materials

4.4.4 While the risk assessment has enabled a prioritisation of the work required at QCHA properties, each type of identified ACM will need specific methods of management, depending on the material. The general policies of managing ACM's identified are outlined as follows:

- Annual condition audit
- Consider the use of labels to easily disturbed areas that cannot be reasonably removed

Work Involving Destructive Access to Properties with ACM's

4.4.5 QCHA undertake surveys of common areas to identify as far as possible all locations of ACM within their property portfolio. There may be areas, however within the structure of the buildings not accessible under the constraints of the Management survey undertaken.

4.4.6 As discussed in Section 3.3.8, QCHA will undertake to perform a Refurbishment survey prior to any work major refurbishment. However, QCHA does recognise that there may be instances where work is due to be undertaken that may involve some form of minor destructive access, such as drilling through cavity walls to install cabling etc. It is recognised that this may reveal the presence of ACMs not previously identified.

4.4.7 Should this work reveal any suspected ACMs, work will immediately cease and operatives will inform QCHA's relevant dutyholder with delegated operational responsibility (DwDOR) will undertake a thorough assessment of the area prior to recommencing any work.

4.5 Emergency Procedures

4.5.1 In the event that any work undertaken at QCHA properties is believed to have disturbed any ACM, either identified in the register, or previously unidentified material, the emergency procedures detailed in Regulation 15 of the Managing and Working with Asbestos ACOP will be followed. In relation to the initial acts the following should happen:

- Work will immediately cease.
- Immediate steps are taken to mitigate the effects of the event,
- The relevant DwDOR is immediately informed of the possible exposure and a sample of the suspect material will be taken for analysis.
- If no asbestos is identified in the sample, no action need be taken.
- If, however, the sample is found to contain asbestos, the relevant DwDOR will determine actions to be taken.

4.6 Use of Licensed Contractors

4.6.1 It is the view of QCHA that in almost all cases, a licensed asbestos contractor will be employed for the undertaking of any works required by the management plan.

4.6.2 QCHA's approved contractors may undertake non-licensable works that are not Notifiable Non-Licensed Work (NNLW) provided that they can demonstrate that the people undertaking the works have received both theoretical and practical training that are refreshed at least annually.

4.6.3 Any work that cannot be demonstrated to be non-licensable and not NNLW will be carried out by a contractor licensed by the HSE. This is the default in case of doubt.

4.7 Procedure for Work with ACM

4.7.1 The requirements covering Plans of Work for asbestos removal are contained in Regulation 7 of the CAR (2012), with additional coverage in Regulation 6. In summary, these require, but are not limited to the following, to which QCHA is committed:

- The employer of workers involved with the remedial or removal work will draw up a written plan of work (method statement).
- Employers will ensure their workers follow this plan.
- If work cannot follow the plan, work will cease and the risks be reappraised. Work will not commence until a new plan is written, or the existing one amended.
- The plan of work must include the following:
 - the nature and probable duration of the work;
 - the number of people involved in the work;
 - the address and location where the work is to be carried out;
 - the methods to be used to prevent or reduce exposure to asbestos, eg, prevention and control measures, arrangements for keeping premises and plant clean and arrangements for the handling and disposing of asbestos waste;
 - the type of equipment, including PPE and RPE, used for:
 - protecting and decontaminating those carrying out the work;
 - protecting other people present at or near the worksite.

4.7.2 The contractor carrying out the work will be responsible for informing the HSE prior to commencement of work to remove asbestos, where this work is licensable.

5.0 Managing and Monitoring the Policy

5.1 An action plan will be formulated with an annual report issued to the Asset Legislation Compliance Team indicating compliance with this Policy & Procedure document.

5.2 This policy and related procedures will be subject to review in three years.

6.0 Equal Opportunities Statement

6.1 Queens Cross Housing Association is committed to developing an organisational culture which values people from all sections of the community and the contribution that all individuals can make to that community.

6.2 Queens Cross Housing Association will apply this policy in a manner, which ensures compliance with the legislation without undermining its overall objective of managing asbestos within its properties.

6.3 The Association will regularly review this policy for equal opportunities implications and take the necessary action to address any inequalities that may subsequently arise from the implementation of the policy.

F.A.O. Operations Manager / Contractor

Dear *Contact*

**MANAGEMENT OF ASBESTOS
CONTRACTOR INFORMATION LETTER**

Queens Cross Housing Association has undertaken Management Surveys in common areas of our domestic properties, and periodic sample surveys of individual internal properties. Records of these surveys are held on the Association's Asbestos online database.

As a contractor employed by Queens Cross Housing Association, you are required to access these records, which are held at <http://qcha.modusaims.net/>, and check for the presence of asbestos prior to the commencement of any works on our properties. Login details are shown below.

User Name:	<i>Contractor</i>
Password:	<i>Password</i>

The Association requires you to complete the attached ~~fax back/post back~~ form and return it to our offices at 45 Firhill Road, Glasgow, G20 7BE or email to asbestos@qcha.org.uk. Once we receive the completed form you will be permitted to continue to work on our properties.

While conducting any works, should you reveal any materials suspected of containing asbestos, work should immediately cease and staff should inform the relevant Dutyholder with delegated operational responsibility who will undertake a thorough assessment of the area prior to allowing the work to recommence.

Yours sincerely

John Boyle
Head of Property Services

For the Attention of John Boyle, Head of Property Services

Please print on your letter headed paper, complete and return by post or to Queens Cross Housing Association, 45 Firhill Road Glasgow or scan and email to asbestos@qcha.org.uk

Contractor
Address

We have received the information pertaining to asbestos for Queens Cross Housing Association, and as a contractor to Queens Cross Housing Association, we agree to undertake an inspection of the asbestos register held on their online database at <http://qcha.modusaims.net/>.

Any works planned which may disturb asbestos materials within these buildings will require adequate planning and full compliance with the CAR Regs (2012).

Sign as Acceptance of terms:
Name (Print):
Official Title:

Appendix 2 – Standards and Abbreviations

Common scientific abbreviations and terms used in this report and their full forms or meanings are given below:

MDHS 100	Surveying, Sampling and Assessment of Asbestos-containing Materials 2001
HSE	Health and Safety Executive
HSC	Health and Safety Commission
CAR	Control of Asbestos Regulations 2012
ACM	Asbestos Containing Material
PPE	Personal Protective Equipment
RPE	Respiratory Protective Equipment
Presumed (to contain asbestos)	A material for which there is insufficient evidence that it is not an ACM.
PAS	Priority Assessment Score
MAS	Material Assessment Score
RAS	Risk Assessment Score

Formula for the calculation of the overall Risk Assessment Score is:

$$\text{RAS} = \text{MAS} + \text{PAS}$$

NNLW Notifiable, non-licensable work