

CLYDE VALLEY HOUSING ASSOCIATION

Asbestos Management Policy

Policy Number M10

• Policy Prepared by	Kevin McGhee Housing Maintenance Manager
• Reviewed by Committee	July 2010
• Approved by Committee	July 2010
• Date of Next Review	July 2013
COMPATIBLE WITH:	
• Legislation	Yes
• Equality Policy	Yes
• Business Plan	Yes
• Performance Standards	Yes
• Tenant Participation Strategy	Yes
• Risk Strategy	Yes
• Statement on Openness and Confidentiality	Yes

Please Note

On request, the Association will provide translations of all our documents, policies and procedures in various languages and other formats such as computer disc, tape, large print, Braille etc. This can be arranged by contacting the Association's office.

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1. Introduction

This policy provides a framework for how Clyde Valley Housing Association (CVHA) will manage asbestos, taking account of statutory and regulatory requirements.

CVHA's Asbestos Management Policy applies to all of CVHA's tenancies and related assets. This policy has been set by the Board of CVHA and will be operated by officers of CVHA.

2. Legislative & regulatory framework

CVHA will comply with all relevant legislation, regulations, standards or any targets set down by the Scottish Housing Regulator in terms of asbestos management.

3. Aims & objectives

The Asbestos Management Policy aims to provide a strategic framework for setting managing asbestos within CVHA's housing stock and related assets.

The main objectives of this policy include:

- taking steps to locate any asbestos containing material in our housing stock and premises and assess its condition;
- maintaining records of the location and condition of asbestos containing materials and assess the risk from it;
- providing information and advice on the location, type and condition of all asbestos material to all contractors or others who may be in a position to disturb it – we will provide all contractors, whether main or sub contractors, with information from our database at tender stage and works orders stage of affected individual properties prior to entry;
- ensuring that all residents and contractors working in tenants homes clearly understand the risks involved in disturbing asbestos containing materials; and
- taking all reasonably practicable steps to prevent our employees and others from breathing in asbestos fibres.

4. Corporate fit

4.1. Legislation & best practice

When managing asbestos, CVHA will comply with the law and the principles contained within any performance standards and guidance notes issued by the Scottish Housing Regulator. In addition CVHA's Asbestos Management Policy is consistent with our Health & Safety Policy, Risk Management Strategy and Asset Management Strategy.

Our Asbestos Management Policy sets out our commitment to adopt the Control of Asbestos at Work Regulations 2006 (CAWR), when managing asbestos and describes the management plan required by Regulation 4 of the CAWR.

Our Asbestos Management Policy establishes clear guidelines to be adopted whenever Asbestos Containing Materials (ACMs) are found in premises owned or occupied by CVHA. Throughout this document, reference is made to a number of publications. These, together with a list of other relevant documents, are detailed below.

ACoP L27	Approved Code of Practice L27: Work with asbestos which does not normally require a licence (Fourth Edition) Control of Asbestos at Work Regulations 2006.
ACoP L28	Approved Code of Practice L28: Work with asbestos insulation, asbestos coating and asbestos insulating board (Fourth Edition) Control of Asbestos at Work Regulations 2006.
ACoP L127	Approved Code of Practice L127: The management of asbestos in non-domestic premises: Regulation 4 of the Control of Asbestos at Work Regulations 2006.
Asbestos Licensing Regulations	Asbestos (Licensing) Regulations 1983 (as amended 1998).
Asbestos Prohibition Regulations	Asbestos (Prohibition) Regulations 1992 (as amended 1999).
CAWR	Control of Asbestos at Work Regulations 2006, which came into force from 13 November 2006.
CDM	Construction (Design and Management) Regulations 2007.
EH 71	Guidance Note EH 71 from the Health & Safety Executive. Working with Asbestos cement and asbestos insulating board.
HSE	Health & Safety Executive.
HSG 247	Health and Safety Guide "Licensed Contractors Guide".
HSG 248	Health and Safety Guide "The Analyst's Guide".
HSG 264	Health and Safety Guide "The Asbestos Survey Guide".
HSWA	Health & Safety at Work Act 1974.
MAS	Material Assessment Score
MHSA	Management of Health & Safety at Work Regulations 1999.
PPE	Personal Protective Equipment.
RPE	Respiratory Protective Equipment.

Type 2 Survey Management Survey.

Type 3 Survey Refurbishment & Demolition Survey.

4.2. Equalities

CVHA's Asbestos Management Policy complies with CVHA's Equality Policy to ensure equality of treatment for all tenants without discrimination or prejudice. At all times CVHA will therefore consider all tenants, regardless of sex, faith or religion, race, ethnic origin, sexual orientation, mental or physical health, disability or marital status.

4.3. Confidentiality

CVHA recognises that confidentiality is important to tenants and will treat their tenancy information in the strictest confidence under the Data Protection Act 1998 and in line with CVHA's Openness and Confidentiality Statement.

4.4. Business Plan & risk management

CVHA's Business Plan and Risk Management Strategy reflect the presence of asbestos within our housing stock and related assets.

4.5. The Board

The Board, via the Operations Committee, will monitor the implementation of this policy to ensure that it is properly operated, that there is appropriate officer involvement in the processes used in managing asbestos, and that there is effective scrutiny of the Asbestos Management Policy.

The Board will ensure that the Asbestos Management Policy is meeting its intended objectives and that appropriate monitoring and reporting of activities takes place.

In implementing its Asbestos Management Policy certain functions are the responsibility of the Board or nominated committee, although staff have delegated authority to undertake many tasks. Examples of key functions / tasks are summarised below.

Function / task	Responsibility
Asbestos Management Policy – review, amendment & approval	Operations Committee responsible for making recommendations to Board for approval.
Asbestos Management Procedures – development, monitoring & review	Operations Director and Housing Maintenance Manager to develop operational procedures that reflect the principles set out within the Asbestos Management Policy.

5. Asbestos Management Policy

Where asbestos is referred to throughout this document it also refers to asbestos containing materials (ACMs).

CVHA is committed to taking all reasonable steps to ensure the health, safety and welfare of all its employees and others. This includes contractors, clients, visitors, tenants and members of the public who may be affected by our actions or omissions.

It is CVHA's policy to take all necessary measures to ensure full compliance with the Control of Asbestos at Work Regulations 2006 (CAWR). This includes the duty to manage any asbestos-containing materials (ACMs) in such a manner as to prevent the exposure of employees and customers to asbestos, or where this is not practicable, to reduce exposure to the lowest possible level.

This includes:

- surveying and assessing those buildings deemed as presenting a risk of containing asbestos;
- disseminating of information; and
- implementing methods for the prevention or reduction of exposure to asbestos fibres during such work.

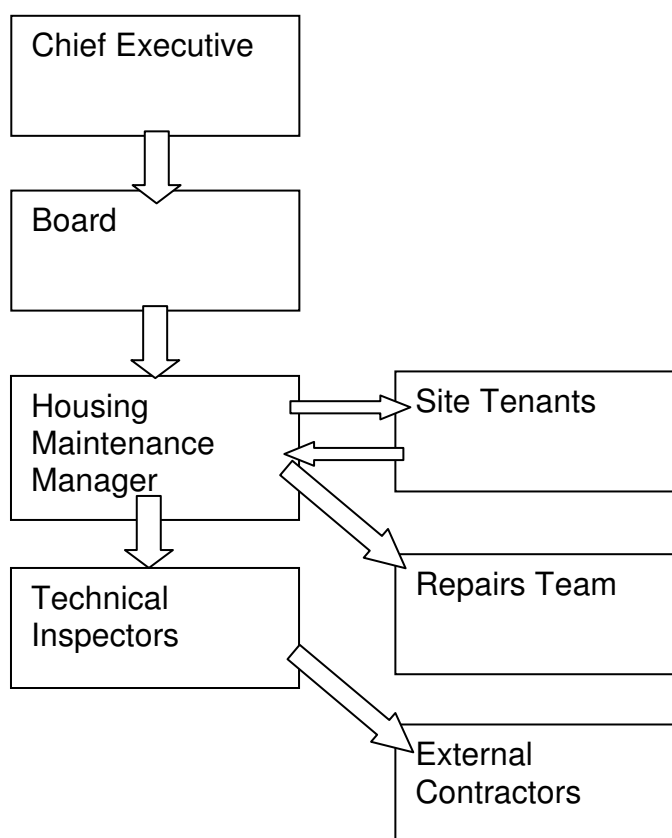
6. Management of Asbestos

6.1 Responsibilities

The "Dutyholder," as defined in Regulation 4 of CAWR 2006, is responsible for the management of the process and will be the holder of the Housing Maintenance Manager post. The "Dutyholder" will:

1. be the first point of contact for all matters relating to ACMs;
2. provide an internal source of information on all items relating to ACMs;
3. manage and co-ordinate asbestos surveys;
4. manage and maintain the Asbestos Register, including:
 - co-ordinating the input of new survey data; and
 - co-ordinating the updating of existing records to include all remediation works carried out;
5. ensure initial surveys are carried out within timescales;
6. co-ordinate the procedures for informing persons at risk as identified in this document;
7. liaise with internal and external contacts, surveyors, suppliers and contractors to provide a comprehensive Asbestos Register, capable of providing all information required by us to comply with this policy; and
8. be the point of focus within the Association for all matters relating to ACMs and the Asbestos Register.

Organisation Chart: CVHA Management of Asbestos



6.2 Information, Instruction and Training

Asbestos is a mineral that is resistant to heat, fire and corrosive chemicals. There are three main types:

- Crocidolite (blue);
- Amosite (brown); and
- Chrysotile (white).

Asbestos is composed of small fibres, which can only be detected by using a microscope under laboratory conditions. Asbestos fibres are hazardous, and principally cause harm to the lining of the lungs when inhaled. As asbestos ages, weathers or is worked upon, it becomes more 'friable' and fibres may be released more easily.

Typical locations of where asbestos can be found are detailed below:

- sprayed asbestos and asbestos loose packing – generally used as fire breaks in ceiling voids;
- moulded or preformed sprayed coatings and lagging – generally used in thermal insulation of pipes and boilers;
- sprayed asbestos mixed with hydrated asbestos cement – generally used as fire protection in ducts, firebreaks, panels, partitions, soffit boards, ceiling panels and around structural steel work;
- insulating boards used for fire protection, thermal insulation, partitioning and ducts;

- some ceiling tiles; and
- millboard, paper and paper products used for insulation of electrical equipment (asbestos paper has been used as a fire proof facing on wood fibre board);

Regulation 9 of the CAWR 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, CVHA will retain all asbestos information relating to our properties within an Asbestos Database and will take all reasonable steps to keep the records up to date.

CVHA has utilised existing records of asbestos-containing materials in our property portfolio and incorporated these within our in-house Asbestos Register. If the planned work directly involves work on any identified or suspected ACMs, a Plan of Work will be produced in accordance with the requirements of the CAWR.

6.2.1 Instruction and Training

CVHA will undertake to source a preferred supplier of asbestos management training and to provide this training to all employees who require it. There will be regular reviews and refresher training as required.

All work to be carried out on licensable asbestos material will involve the use of an HSE-licensed contractor. Where permitted under the CAW Regulations CVHA contractors may carry out the works on unlicensable materials such as asbestos cement, floor tiles or roofing felt. All such contractors will be fully trained in asbestos awareness and in the use of Personal Protective Equipment (PPE) and Respiratory Protective Equipment (RPE) as appropriate.

6.2.2 Assessment of Property Portfolio

The first step of our 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.

CVHA has undertaken an initial assessment of their portfolio. This has enabled us to prioritise, as necessary, more detailed surveys of those properties deemed to be likely to contain asbestos.

CVHA has also undertaken surveys of existing house types to prioritise as necessary, 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.

6.3 Assessment of ACMs

CVHA has carried out comprehensive surveys of ACMs within our buildings. These surveys have enabled us to be aware of the exact location, extent and condition of ACMs within our properties.

Regulations 4(3) to 4(5) of the CAWR set out the requirements for assessment of the properties under the control of CVHA. 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.”

CVHA’s specialist asbestos management consultants have carried out Type 2 Management Surveys, as determined by the HSG 264 document – the Asbestos Survey Guide. CVHA ensures that all external consultants and contractors working on such surveys utilise laboratory testing using appropriate experience and accreditation (either ISO 17025 or EN 45013). All Type 2 asbestos surveyors used by CVHA will be trained to a minimum of BOHS P402 Certificate standard – they must be able to demonstrate the necessary experience and ongoing training records necessary to show proper competence in carrying out asbestos surveys.

CVHA will also ensure that Type 3 Refurbishment & Demolition Survey) are carried out prior to any demolition work or major refurbishment. CVHA defines ‘major refurbishment’ as such work covered by the Construction (Design and Management) Regulations 1994.

In all cases, surveys of premises for the purposes of identification and assessment of ACMs will be carried out in full accordance with the guidance set out in the HSE publication, Health and Safety Guide 264 – The Asbestos Survey Guide (HSG 264). Such surveys will include numerical assessment of the condition of any identified ACMs. This Material Assessment Score (MAS) will depend upon the material in question, its condition, any surface treatment and the type of asbestos it contains.

The findings of all surveys will be used for management purposes, and included within the electronic Asbestos register, to highlight any identified ACMs to contractors working within the area or dwelling.

6.4 Assessment of Risk

Regulation 4(8), Part (a) of CAWR sets out 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 MAS for the identified ACMs.

CVHA 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 maintenance activities, likelihood of disturbance, human exposure potential and occupant activity.

7. Asbestos Management Plan

Following the requirement to comply with Regulation 4(8), part (c) to 4(10) of CAWR, CVHA has undertaken to implement a suitable plan for the management of all Asbestos Containing Materials (ACMs) within our 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.

However CVHA's policy regarding the planned management of ACMs is set out below.

7.1 The Plan

The scope of the Management Plan covers all CVHA premises (with the exception of those that have been deemed as presenting no foreseeable risk of containing asbestos, i.e. those where construction commenced after 1999). The Plan will ensure that all necessary measures for controlling the risk of exposure are implemented.

These measures will include, but are not limited to:

- monitoring of the condition of identified and suspected ACMs (see Section 6.3 of this document);
- ensuring information is disseminated as required (Section 6.2);
- reviewing the Management Plan, both on a regular planned basis, with additional reviews if there is reason to believe it is no longer valid; and
- ensuring that measures specified in the Plan are implemented according to the Plan, and recorded in the Plan.

7.2 Management of ACMs in CVHA Properties

CVHA has undertaken to identify as far as possible all locations of ACMs within our property portfolio. There may be areas, however within the structure of the buildings not accessible under the constraints of the Type 3 survey undertaken.

CVHA has an asset management database within our internal computer system, which incorporates an Asbestos Register. This approach identifies the location of ACMs and is provided to contractors in the event of routine and planned maintenance so that the contractor will undertake a thorough assessment of the area prior to commencing any work.

8. Policy review

CVHA will publicise its Asbestos Management Policy through our intranet.

CVHA will typically review its methodology for managing asbestos every three years or sooner if required by statutory, regulatory or best practice requirements.