



Cassiltoun Housing Association

ASBESTOS POLICY

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Chair Person/Office Bearers Signature:	

**CASSILTOUN HOUSING ASSOCIATION LIMITED
CASTLEMILK STABLES, 59 MACHRIE ROAD, GLASGOW G45 OAZ**

Cassiltoun is a registered Scottish Charity no 035544

CASSILTOUN HOUSING ASSOCIATION LIMITED

ASBESTOS POLICY

1.0 INTRODUCTION

The Association has stated its commitment, through its Health & Safety Policy Statement, to take all reasonable steps to ensure the health, safety and welfare at work of all its employees and others, including contractors, consultants, visitors, clients, tenants and members of the public who may be affected by its acts or omissions.

The purpose of this policy document is to:-

- ensure that the Association complies with appropriate legislation;
- establish clear guidelines to be adopted whenever asbestos is encountered in premises owned by or occupied by the Association.
- State the Association's policy that asbestos will not be removed where, following detailed assessment, it is proved to be not in a hazardous condition and will not be damaged or otherwise exposed, nor will it affect future maintenance plans or activities.

2.0 DEFINITION

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;
- Ceiling and floor tiles;
- Textured coatings (sometimes known as “Artex”) found on walls and ceilings; &
- 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 Control of Asbestos Regulations 2012 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, CHA 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.

CHA 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 Control of Asbestos Regulations.

CHA 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 Control of Asbestos Regulations 2012 CHA 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.

3.0 HEALTH EFFECTS

The presence of asbestos does not, in itself, present a hazard, provided it is in good condition, sealed (e.g. with paint or other material) and is not likely to be damaged or worked on.

4.0 LEGISLATION

The main relevant pieces of legislation in the UK are:-

- **The Asbestos (Licensing) Regulation 1983** which prohibits work with asbestos insulation or coating of greater than 2 hours duration without a licence issued by the Health and Safety Executive.
- **The Control of Asbestos at Work Regulation 1987** require that an employee's exposure to asbestos be prevented or reduced as far as is reasonably practicable and that any risks are assessed before work with asbestos is started. The regulations also establish control limits for exposure. The legislation is supported by two Approved Codes of Practice.
- **The Health and Safety at Work Act 1974** which imposes general duties on employers to ensure the health, safety and welfare of employees and others who may be affected by an organisation's undertakings.
- **The Management of Health and Safety at Work Regulations 1992** which require employers to assess the risks to the health and safety of employees and others at work.
- **The Construction (Design and Management) Regulations 1994** which place duties on clients, planning supervisors, principal contractors, designers and contractors to plan, coordinate and manage health and safety on construction work if the work will last in excess of 30 days or involves five or more people on site at any one time. The regulations specifically require the client to provide relevant health and safety information to the planning supervisor appointed to oversee the project. This information might include, for example, previous surveys of buildings etc. for asbestos.
- **The Construction (Design and Management) Regulations 2007** which generally place greater responsibility on the client. The Association now appoints the CDM Co-ordinator and the principal contractor following an assessment of competency and resources and must ensure plans and welfare are in place before construction begins.
- **The Control of Asbestos at Work Regulations 2002 (CAWR)** which places a new legal duty on the 'Duty Holder' to manage asbestos in non-domestic premises. It is likely that this legislation will be extended in the future to include domestic dwellings. The duty to manage came into effect on 21 May 2004. On 21 November 2004, a further duty came into effect regarding the accreditation of those who identify asbestos in materials.

As it is difficult for a corporate body such as the Association to be a Duty Holder, the Director of Operations will accept the responsibilities of the Duty Holder but will also appoint a member of staff, namely the Technical Officer, to act as an Asbestos Co-ordinator and implement the policy.

➤ **The Control of Asbestos Regulations 2012** introduced a more stringent control limit, alter the licensing requirements, in particular exempting textured decorative coatings from licensing, and placing more onerous training requirements on employers whose employees might be exposed to asbestos. The Association continues to remove textured coatings where appropriate but these regulations no longer require a licensed contractor to undertake the sampling.

➤ **Refurbishment surveys guidelines 2010**

In accordance with expert advice received from ACS Physical risk Control Ltd, the Association will undertake a limited survey of between 10% and 15% of house types prior to refurbishment works in order to analyse trends. Further surveys will be commissioned if trends are unclear.

5.0 STATEMENT OF POLICY

The Association will undertake to comply with all relevant statutory provisions concerning asbestos by adopting the following strategy:-

5.1 Asbestos Management System

A sound management strategy involving the identification, assessment and management of all asbestos materials has been put in place to ensure that the risk of exposure to workers and others who may use any building owned by the Association or who come across asbestos during their work is controlled.

Appendix 1 outlines the features of the Asbestos Management System to be adopted by the Association. The system should be referred to for general guidance whether part of a proactive survey programme or as a response to discovering a material suspected of being asbestos either accidentally or during work.

The Association will train members of staff including the maintenance office and housing officers to identify the possible presence of asbestos. Where asbestos is suspected, the Association will appoint an external consultant having UKAS (United Kingdom Accreditation Service) accreditation to analyse a sample of the suspected material and, if found to be asbestos, to advise the Association on its management. The control of Asbestos at Works Regulations requires the Duty Holder to presume that materials contain asbestos unless there is strong evidence that they do not. A fuller description of this is given in **Appendix 2**.

The Asbestos Management System consists of two inter-related features:-

➤ **Proactive Response**

This involves establishing a planned survey programme, the purpose of which is to:-

1. Develop a systematic programme for identifying the presence of asbestos in certain Association premises.
2. Identify the current condition of asbestos in Association properties (so that any remedial work can be priced and scheduled),
3. Assess the risk of likelihood of anyone being exposed to asbestos
4. Monitor and manage the discovery of suspected asbestos materials and any work in proximity to asbestos.
5. Co-ordinate awareness training for relevant staff, contractors and any other relevant persons
6. Review the Asbestos Management System periodically

➤ **Reactive Response**

This involves procedures to be adopted where a material suspected of being asbestos is discovered either accidentally or during work. Those potentially exposed include all users of Association premises and others including contractors carrying out work on behalf of the Association.

The person locating the suspected asbestos has a duty to inform the Technical Officer who will stop the work if this has not already happened, consider the desirability of vacating the building or part of the building to avoid exposure and appoint a UKAS consultant to advise the association. Procedures to be adopted will be site specific and should as far as is practical take account of location/type/form/volume and condition of the asbestos.

5.2 Asbestos Register

An "Asbestos Register" will be held for all property owned by the Association. The purpose of the Register is to formally record, through survey and inspection, the location and condition of asbestos in Association premises. The accuracy of the information contained in the Register will be assured by regular inspections when it will be the responsibility of suitably trained staff to assess the condition of asbestos and make any necessary amendments to information contained in the Register.

Where changes in the condition of asbestos are identified the inspector must immediately report the matter to the Asbestos Co-ordinator.

The Register must be as accurate as possible and must be brought to the attention of any person carrying out any alteration work to buildings, which may risk exposure to building materials on Association owned premises.

5.3 Training and Instructions

All staff who may foreseeably encounter asbestos during their working day will be trained to an appropriate level to ensure, so far as reasonably practicable, their health, safety and welfare and that of others.

Staff with a direct responsibility for the inspection and management of asbestos will receive specific training

The qualifications and competence of all contractors carrying out asbestos work will be assured through the Association procedures for awarding contracts.

Appointments of consultants will include a warning to consider and advise on the possible presence of asbestos.

The Association requires its planned and reactive maintenance contractors to confirm that they have asbestos management training and practice in place for their operatives. Where an operative suspects that they have identified a suspect material such as asbestos during the course of their work, they contact their employer who advises the Association. The Association then arranges for the contractor to contact one of the specialist contractors for sampling to take place.

5.4 Asbestos Removal

The decision on whether to remove asbestos will be based upon the UKAS consultant's advice. The UKAS consultant will ensure that a HSE licensed contractor is appointed to remove the asbestos and will examine and approve the Method Statement provided by the contractor. Alternatively where the work can be carried out without a license, the contractor will be required to submit a Method Statement for approval from the UKAS Consultant.

5.5 Monitoring Procedures

Where the presence of asbestos is established, a monitoring schedule will be established. This will take the following form:-

➤ Planned Monitoring

1. At the appropriate intervals, a programme of monitoring inspections will be carried out by competent persons.
2. These persons, who will be trained in the identification and assessment of asbestos, will be issued with details, from the Asbestos Register, of location, type and condition of asbestos at each site.
3. These persons will be required to assess the state of the asbestos and complete a formal report, which must be signed and dated and used to update the Asbestos Registers.
4. Where the results of the assessment indicate that the condition of the asbestos has deteriorated, the appropriate steps must be taken without delay to:-

- Report to appropriate line manager.
- Immediately evaluate the risks to people in the vicinity;
- Decide whether the asbestos can be made safe (i.e. sealed) or should be removed.

➤ Unscheduled Monitoring

1. The guidelines (at (1) above) should be used in instances where anyone becomes aware of a change in the condition of asbestos during normal work activities or identifies new asbestos. The management of the asbestos may need to be reconsidered in the light of unexpected events such as a fire.

6.0 RESPONSIBILITIES

6.1 Technical Officer

The Technical Officer will:

- ensure that the Association is complying with current legislation and the Association's procedures
- monitor the Action Plan for The Asbestos Management Strategy
- Maintain the Asbestos Register, including advising contractors and consultants of the presence of asbestos where appropriate
- Co-ordinate the Asbestos Management Strategy
- Maintain a record of asbestos related training and ensure that staff are given a level of training that is appropriate to the post.

6.2 Duties of Employees

Over and above the duties expressed in the Health and Safety at Work etc. Act 1974, and this policy every employee has a general duty to:

- Report any asbestos which in their opinion is in a hazardous condition
- Not to interfere with materials suspected of being asbestos
- Not to collect materials for sampling purposes unless specifically trained to do so

7.0 RELATED POLICIES AND PRACTICES

The Association's Void Inspection Policy has been amended to include a visual inspection of the property for the presence of asbestos by trained CHA staff.

The Tenants' Handbook prohibits the use of "Artex or textured paint". Whilst only pre-1985 textured paint presents a small risk to occupiers, this finish is difficult and costly to maintain in a satisfactory condition.

Consultants and contractors will be instructed to assess and advise the Association of the risk of asbestos when working on stage 3 adaptations and demolitions.

8.0 TENANT IMPLICATIONS

The preference for the Association is to remove asbestos where present, subject to the recommendation of the consultant. If removal in a house is not undertaken, the Association will advise the tenant of the location and presence of asbestos. The tenant will be advised that it must not be disturbed.

8.0 REVIEW OF POLICY

This policy will be reviewed by the Association every 3 years.