



## **The Langstane Group**

### **Asbestos Management Policy**

Senior management team approval	1 July 2020
Board / Committee	Board of Management
Approval date	27 July 2020
Implementation date	1 August 2020
Review date	June 2023
Version	V3

<b>Policy Version</b>	<b>Date of Approval</b>	<b>Changes made to Policy</b>
Version 1	16 March 2015	New policy
Version 2	1 July 2017	Changes made: - addition of Appendix E,F,G, H, I and all green text.
Version 3	27 July 2020	<p>Policy reformatted to suit current policy template. Minor grammar changes and removal of 'our' and 'we' to be replaced with 'Langstane'.</p> <p>All procedures removed from body of policy and created as separate documents. All template letters / leaflets removed from body of policy and created as separate documents.</p>

## Contents

1. 1. Introduction .....	4
2. 2. Policy Statement .....	5
3. 3. Objectives .....	5
4. 4. Links to other Policies .....	5
5. 5. Langstane's duties and applicable legislation .....	5
6. 6. Complying with CAR 2012.....	6
6.1 Surveys.....	7
6.2 Asbestos Register .....	8
6.3 Risk Assessments.....	10
6.4 Management Plan .....	11
6.5 Typical management approaches.....	13
6.6 Inspections.....	14
6.7 Updating the Register and Management Plan .....	14
7. 7. Staff responsibilities .....	15
8. 8. Staff training .....	17
9. 9. Working with ACMs .....	18
9.1 Work that does not require a licence .....	18
9.2 Work that does require a licence .....	19
9.3 Where ACMs are being removed .....	19
9.4 Approved Contractors and Consultants .....	20
10. 10. Emergency situations .....	20
11. 11. Monitoring and Review .....	21
12. Appendix A – Process map – Planned Works .....	23
13. Appendix B – Process map – Repairs .....	25
14. Appendix C – Process map – Void works.....	27
15. Appendix D - Emergency procedures.....	29

## 1. Introduction

Langstane Housing Association is a Co-operative and Community Benefit Society, and a registered social landlord with charitable status.

The Langstane Group (Langstane / the Group) consists of Langstane Housing Association Limited and its wholly owned subsidiaries.

This policy applies to all members of the Langstane Group.

Asbestos is the name given to a group of fibrous, naturally occurring silicate minerals. These materials are resistant to heat and most chemicals (most forms are chemically inert). The fibres do not evaporate into air or dissolve in water. They have no odour and do not migrate through soil. As long ago as prehistoric times, asbestos was considered to be a wonder mineral that had limitless uses.

It's stable properties made asbestos popular as a building material, and it has been used in construction since the 1920's and 30's, with use peaking in the 60's and 70's but continuing until 2000.

Common uses of asbestos include:

- Loose asbestos packing, generally used as fire breaks in ceiling voids
- Moulded or preformed lagging, mostly used as thermal insulation for 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 surrounding structural steel work.
- Insulation board used for fire protection, thermal insulation, wall partitions, duct work and ceiling tiles
- Asbestos cement products commonly found as corrugated or flat sheets used for roof and wall cladding, gutters, rainwater pipes and water tanks
- Reinforced plastics, mastics and sealants
- Millboard, paper and paper products used for insulation of electrical equipment
- Textured coatings, decorative plasters and paints
- Asbestos ropes and cloth

Asbestos was used in a huge range of products and although a visual inspection can highlight a risk that an asbestos containing material (ACM) may be present in a building, only sampling can confirm its presence.

Asbestos within properties is safe if it is in good condition and not damaged or disturbed. The danger from asbestos comes from breathing in airborne fibres and current legislation is designed to reduce the chances of asbestos disturbance by ensuring that organisations hold detailed records of the presence of asbestos in their properties.

If breathed in, fibres can lie dormant in the lungs for 15 – 50 years before starting to cause health problems, including pleural plaques, asbestosis and mesothelioma (asbestos related cancer).

Around 2,500 people every year are diagnosed with mesothelioma, primarily men who worked in shipbuilding or the construction industry and the figure is rising. There is also an increase in the number of women being diagnosed, primarily due to indirect exposure – living close to factories using asbestos or cleaning partners clothing covered in fibres.

## **2. Aims and objectives of the policy**

The main objectives of this policy are to:

- Ensure that Langstane complies with its various duties in relation to the management of Asbestos
- Ensure that Langstane's approach to asbestos management minimises any risk of exposure to tenants, staff, contractors and the general public
- Ensure that there are clear procedures in place for all stages of managing asbestos from the identification of asbestos through to accidental disturbance of possible asbestos containing materials (ACMs)
- Ensure that staff are aware of their duties in relation to asbestos management and regular programme of training and awareness is in place

## **3. Links to other strategic documents and policies**

This policy links to a number of Strategies and Policies including:

- Asset Management Strategy
- Health and Safety Policy & Procedures
- Planned & Cyclical Maintenance Policy
- Responsive Repairs Policy
- Void Management Policy

## **4. Policy Statement**

This policy is intended to give staff an insight into how Langstane manages ACMs within its properties and what role staff play in the management of asbestos. The policy should be read in conjunction with accompanying procedures and flowcharts.

## **5. Langstane's duties and applicable legislation**

- Control of Asbestos at Work Regulations (CAR 2012)
- Health and Safety at Work Act 1974 (HSWA)
- Management of Health and Safety at Work Regulations 1999
- Report of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR 2013)
- Workplace (Health, Safety and Welfare) Regulations 1992

- Occupiers Liability Act 1984
- Construction (Design and Management) Regulations 2015 (CDM 2015)
- HSE Guidance [HSE - Asbestos: Asbestos essentials](#)

Taking these key pieces of legislation into account, Langstane's objective is to assess the risks from ACMs and implement procedures to manage them by:-

- Maintaining an up-to-date Asbestos Register capturing the location, condition and extent of known or suspected ACMs
- The Asbestos Register will cover primarily non-domestic properties, but as information is gathered on domestic properties this will be added to the register to assist in complying with Langstane's duty of care to protect tenants and tradesmen who live and work in these properties.
- There is a named person (the 'dutyholder') responsible for ensuring that the Asbestos Register and Management Plan are maintained and updated as new information becomes available, although the actual day to day maintenance of the Register may be delegated to another named person.
- Relevant staff are given sufficient skills, knowledge and safety equipment to identify and work safely with suspected hazardous materials, and will be provided with regular Asbestos Awareness Training in accordance with Regulation 10 of CAR
- External contractors and consultants safety is maintained by ensuring that they have received suitable training and have information about ACMs in the properties they are working in/on
- On-going monitoring, auditing and reviewing of asbestos information
- Tenants safety is maintained by ensuring that they have access to information about ACMs within the properties they live in, and are given adequate information about how to live safely with those ACMs

## 6. Complying with CAR 2012

Regulation 4 of CAR 2012 places an explicit duty on the owners and occupiers of non-domestic premises (for Langstane non-domestic properties covers all communal areas of flatted blocks and commercial units), who have maintenance and repair responsibilities to assess and manage the risks from the presence of asbestos.

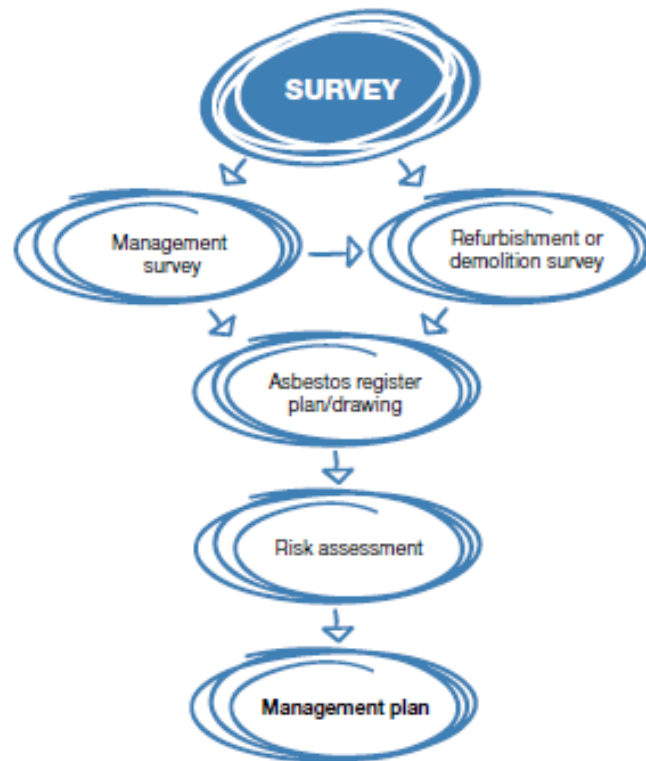
The risks will vary with circumstances and can arise from normal occupation of a building or from inadvertent disturbance during the repair, refurbishment and demolition of premises.

The risk assessment will be used to produce a management plan which details and records what actions need to be taken to manage and reduce the risks from asbestos.

The requirements are placed on 'dutyholders', who should:

- take reasonable steps to find out if there are materials containing asbestos (ACMs) in non-domestic premises, and if so, where it is and what condition it is in;
- presume materials contain asbestos, unless there is strong evidence they do not;

- make, and keep up to date, a record of the location and condition of the asbestos-containing materials or materials which are presumed to contain asbestos (The Asbestos Register);
- assess the risk of anyone being exposed to fibres from the materials identified;
- prepare a plan that sets out in detail how the risks from these materials will be managed (the Management Plan)
- take the necessary steps to put the plan in to action
- periodically review and monitor the plan so that it remains relevant and up-to-date
- provide information on the location and condition of materials to anyone who is liable to work on or disturb them.



The above flow chart shows the HSE's recommended approach to complying with Regulation 4 of CAR 2012. This flowchart has been used to structure the remainder of this policy.

### 6.1. Surveys

The first stage of compiling any Asbestos Register is to carry out surveys of properties to identify Asbestos Containing Materials (ACMs).

The HSE have published their *HSG264 Asbestos: The Survey Guide* to give organisations clear advice about procuring surveyors, determining which type of survey to undertake and using survey information to compile the Asbestos Register.

Staff responsible for procuring asbestos surveys should read the Survey Guide and ensure they are following best practice. All surveyors should hold a UKAS or equivalent accreditation.

Much of the following information on surveys is taken from the HSE document, to ensure that Langstane is working to best practices.

There are currently two types of surveys which can be undertaken to identify ACMs:

### **Management Surveys**

Previously known as Type 2 surveys, a management survey is the standard survey undertaken by building owners. 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.

Information from management surveys is used to compile the Asbestos Register.

### **Refurbishment & Demolition Surveys**

Previously known as Type 3 surveys, a refurbishment and demolition survey is a more intrusive survey which is required before any disruptive work is carried out. This type of survey is 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 if demolition is planned.

Langstane will instruct Refurbishment & Demolition surveys prior to any disruptive works which may include works such as kitchen, bathroom, window and heating replacements or disruptive void repairs.

The findings of refurbishment & demolition surveys will be added to the Register.

Where staff outwith the Asset Management team instruct asbestos surveys for any reason, copies should be provided to the dutyholder / delegated person to ensure the survey findings are updated in the Register.

## **6.2. Asbestos Register**

A total of 1684 properties were constructed or refurbished by Langstane pre 2000 (around 60 per cent of stock). 95% of this stock has had a type 2 survey carried out. An asbestos consultant has been appointed to carry out additional management surveys of Langstane's stock to bring its asbestos information as up to date as possible and this work will be complete by the end of 2020.



The information from management surveys is collated into an Asbestos Register which gives details of all instances of confirmed and presumed ACMs within Langstane's properties and is used to highlight such instances to in-house and external contractors and consultants who may be carrying out work in the affected properties.

Example of a typical Asbestos Register entry:

ASBESTOS REGISTER

SITE 64 Ashgrove Road, Aberdeen, AB25 3AD					BUILDING A-T Communal			CONSTRUCTION 1996				
Room Ref	Level of Identification	Asbestos Type	Sample No.	Location & Description	Product Type	Condition	Surface Treatment	Access	Extent	Material assessment	Priority assessment	Overall Assessment
External	Presumed	Unknown	-	Soffits to second floor	Unknown	Unknown	-	Difficult	-	8 MEDIUM	2 LOW	10 LOW
External Main roof	Strongly presumed	Chrysotile	As ATCS2141017	Cement roof tiles	A/C	Good	Unsealed	Difficult	25m2	5 LOW	2 LOW	7 LOW
External	Strongly presumed	Chrysotile	As ATCS2141017	Cement roof tiles on wall	A/C	Good	Unsealed	Difficult	2m2	5 LOW	2 LOW	7 LOW
Attic	Sampled	Chrysotile	As ATCS2141017	Cement roof tiles	A/C	Good	Unsealed	Difficult	Through out roof	5 LOW	2 LOW	7 LOW

MAINTENANCE - DO NOT carry out maintenance if ACMs are at risk of being disturbed or damaged. If repair cannot be carried out contact Asset Management team who will arrange for specialist contractor to attend.

[Notes / revisions](#)

This sample entry highlights that there is 'presumed' asbestos in the soffits, 'strongly presumed' asbestos in the cement roof tiles externally and 'sampled' asbestos in the roof tiles in the attic space. Below is a description of what each of these levels of identification means.

### Levels of Identification:

#### Sampled

These are ACMs which have been confirmed through sampling.

#### Strongly Presumed

In this case the material looks as if it is an ACM. This conclusion can be reached through visual inspection alone by an experienced surveyor.

Examples would be:

- laboratory analysis confirmed the presence of asbestos in a similar material
- materials in which asbestos is known to have been commonly used in the manufactured product at the time of installation (e.g. corrugated cement roof etc.)
- materials which have the appearance of asbestos but no sample has been taken, e.g. thermal insulation on a pipe where fibres are clearly visible.

## Presumed

Where a material is presumed to contain asbestos it is because there is insufficient evidence to confirm that it is asbestos free, or because a duty holder/surveyor has decided that it is easier under the planned management arrangements to presume ACMs are present. Areas which are inaccessible will also be presumed to contain ACMs.

## Location and format of registers

Langstane's Asbestos Register is held electronically in a location accessible to all staff. Properties which have presumed or confirmed ACMs also have a warning marker in the QLx housing management system which alerts staff to refer to the Register before instructing work in that property (see Section 7.0 and Appendix A-C)

In-house DLO staff carry a paper copy of the Asbestos Register in their vehicle.

Langstane's out-of-hours contractor, voids contractor and gas servicing contractor are issued with a paper and electronic copy of the Asbestos Register. Other contractors will be issued with copies of the register as and when required. When a register entry is updated, all parties with a copy of the asbestos register are issued with a copy of the update.

It is the intention that Langstane will implement access to the register using a cloud based system in the next 12 months which will improve accessibility of the information by both staff and contractors.

## 6.3. Risk Assessments

### Asbestos material risk assessments

Risk assessments are carried out on each ACM within the Asbestos Register and these assessments are used to create a Management Plan, which determines the priority and the relevant action for dealing with each ACM.

Initially a material assessment is undertaken by the asbestos surveyor for each ACM to determine the potential for releasing fibres. The HSE's algorithm is used to calculate the Material Risk.

An overall material assessment is calculated using this algorithm and a Material Score is given to each ACM:

Overall Material Score	Potential to release fibres
10+	High
7 – 9	Medium
0 – 6	Low

Where a material is 'presumed' and the surveyor has not carried out a material risk assessment, Langstane has presumed the material is Crocidolite and scored the material accordingly until samples can be taken.

The Material Score shows the ACMs potential to release fibres but it does not necessarily follow that a high material score means that the ACM is a high priority for removal.

### **Asbestos Priority Risk Assessments**

Langstane, as dutyholder, will also carry out a Priority Assessment for each ACM taking into account factors such as use of the building, accessibility of the ACM, likelihood of maintenance being carried out in the vicinity of the ACM etc.

The HSE has published a template for Priority Assessments which is used to carry out the assessments.

Priority Assessments will be carried out for all ACMs which will result in scoring as noted below:

<b>Priority score</b>	<b>Priority rating</b>
>15	Very High
11 – 15	High
6 – 10	Medium
0 – 5	Low

An overall material + priority score is then worked out by adding together the Priority Assessment and Material Scores and will give an overall score as follows:

<b>Material + Priority score</b>	<b>Overall priority</b>
19 – 24	High
13 – 18	Medium
9 – 12	Low
8 or less	Very Low

## **6.4. Management Plan**

This overall priority score will determine what action Langstane takes to manage each ACM and this forms the Management Plan:

### **High Priority**

High priority ACMs will be stabilised through repair or replacement in the areas of damage. Wherever possible, the ACM will be encapsulated to ensure an efficient and long-lasting protection, appropriate to the expected and foreseeable level of likely disturbance. The Register will be updated to reflect any changes made to the

ACM, and material and priority scores recalculated as required. The remedial actions taken should result in a 'Medium Priority' score or better.

Only as a last resort will ACMs be removed. The relative risks and disruption involved in any asbestos removal operation are recognised and will, wherever possible, be avoided.

### Medium Priority

This is the most complex and demanding score area for effective risk management. Where Risk Assessment Scores fall into this category, it is likely that a number of discrete factors from both the Material and Priority Assessment will need to be considered in order to determine the most relevant and effective course of action, and to determine the most appropriate inspection frequency.

- Inspections of Medium Risk ACMs will be carried out every 12 months unless the priority assessment indicates a higher frequency is required.

### Low or Very Low Priority

These scores indicate that the ACM currently poses no significant threat to building users. These risks can be adequately controlled by regular visual inspections to assess the condition of the ACM. Records of these inspections shall be maintained.

- Inspections of Low or Very Low Risk ACMs will be carried out every 12 months.

Overleaf is a typical property Management Plan:

#### ASBESTOS REGISTER

SITE 64 Ashgrove Road, Aberdeen, AB25 3AD					BUILDING A-T Communal			CONSTRUCTION 1996				
Room Ref	Level of Identification	Asbestos Type	Sample No.	Location & Description	Product Type	Condition	Surface Treatment	Access	Extent	Material assessment	Priority assessment	Overall Assessment
External	Presumed	Unknown	-	Soffits to second floor	Unknown	Unknown	-	Difficult	-	8 MEDIUM	2 LOW	10 LOW
External Main roof	Strongly presumed	Chrysotile	As ATCS2141017	Cement roof tiles	A/C	Good	Unsealed	Difficult	25m2	5 LOW	2 LOW	7 LOW
External	Strongly presumed	Chrysotile	As ATCS2141017	Cement roof tiles on wall	A/C	Good	Unsealed	Difficult	2m2	5 LOW	2 LOW	7 LOW
Attic	Sampled	Chrysotile	ATCS2141017	Cement roof tiles	A/C	Good	Unsealed	Difficult	Through out roof	5 LOW	2 LOW	7 LOW

MAINTENANCE - DO NOT carry out maintenance if ACMs are at risk of being disturbed or damaged. If repair cannot be carried out contact Asset Management team who will arrange for specialist contractor to attend.

[Notes / revisions](#)

## MANAGEMENT

**SOFFIT BOARD** – similar soffit board at first floor was sampled and did not contact ACMs. Arrange for second floor soffits to be sampled using specialist height equipment.

**CEMENT ROOF TILES** – Leave in place and re-inspect annually to monitor condition.

## COMMUNICATION PLAN

Alert contractors to presumed presence of ACMs via works orders.  
See Asbestos manual for details of communications with tenants.

The Management Plan is essentially an expanded version of the Register and details the actions that will be taken to manage each ACM and the method of communication required to ensure the safety of building users.

## **6.5. Typical management approaches**

For the most common instances of asbestos in Langstane properties the following management approach has been agreed:

**Storage heaters** – asbestos was used as insulation in storage heaters and generally it has been presumed that storage heaters installed prior to 1999 contain ACMs, although it is very unlikely that all but the oldest heaters actually do.

Where the storage heater make and model are known it will be checked against the Asbestos Information Centre database of storage heaters known to contain ACMs.

Where the heater is a type that does contain ACMs it will be programmed for immediate removal and disposal by a specialist contractor in accordance with HSE A31 guidance.

Where the storage heater is a type known to contain no asbestos, it will be left in-situ and replaced in line with planned maintenance programmes for that property. A note will be placed on the relevant Asbestos Register entry with details of the make & model of the heater and confirmation that it does not contain ACMs.

**Textured ceiling finishes** – where a textured ceiling is sampled and contains ACMs and is in good condition it will be left in-situ and inspected every 12 months to monitor its condition. Langstane has a number of textured ceiling finishes which were sampled in 2005 and found to contain no ACMs but subsequent sampling has cast the 2005 samples in doubt and Langstane has taken the decision to presume all textured finishes pre 2001 contain ACMs until further sampling can be carried out. Where a textured ceiling containing ACMs is present in a room where major works are being carried out it will usually be encapsulated to prevent a risk of damage during the works, and this will be recorded in the register.

**Electrics** – Langstane’s 2005 surveys presumed asbestos was present in all electrical equipment. Given the age of Langstane’s properties it is doubtful there is asbestos in any of the electrical equipment, and where modern RCD consumer units are installed it is presumed that no ACMs are present. Where the age of the electrics is unknown the electrical equipment has been noted in the register and annual inspections will be carried out.

**Labelling** – Langstane does not routinely label asbestos in domestic properties or common areas due to the alarm this could cause tenants. However, in specific circumstances labelling will be considered, for instance where it is presumed that asbestos may be present in service ducts but due to inaccessibility this cannot be confirmed.

## 6.6. Inspections

To comply with Regulation 4 of the Control of Asbestos Regulations, Langstane will carry out inspections of all known ACMs left in-situ to assess condition in accordance with the timescales set out in the management plans.

The risk assessments and management plans for ACMs will be updated accordingly. The re-inspection results are an important mechanism for ensuring that deterioration of any ACMs is managed effectively.

## 6.7. Updating the Register and Management Plan

The Register and Management Plan only remain useful documents if they are regularly reviewed and updated. Staff must communicate concerns about suspicious materials to the dutyholder / delegated person, and any asbestos surveys carried out on a Langstane property must be provided to the dutyholder so that the results can be incorporated into the Register and Management Plan.

The dutyholder / delegated person will ensure that:

- The Register is updated whenever ACMs are inspected, removed or encapsulated
- Records of revisions to the Register are maintained on each Register entry
- Updates to the Register are distributed to all parties holding a copy of the Register

In addition the dutyholder / delegated person should ensure that the following records are kept:

- Advice given on asbestos to staff, tenants and contractors
- Advice received from consultants and HSE
- Air monitoring reports
- Audit records
- Details of inspections of asbestos containing materials

- Details of all asbestos removal or encapsulation work
- Incident reports
- Method statements for work involving asbestos containing materials
- Notifications to the HSE
- Copies of waste disposal certificates where asbestos works are carried out

The next section of this document sets out in more detail the responsibilities that various teams have in ensuring that Langstane's approach to Asbestos Management meets with legislation.

## **Staff responsibilities**

Many staff will have some responsibility within their day to day duties in terms of ensuring that the Association fulfils it's duties under the various pieces of legislation highlighted in Section 2.0

### **Director of Asset Management**

Langstane's dutyholder is the Director of Asset Management. They will have overall responsibility for ensuring that the Association meets it's obligations under CAR 2012.

- The Director will ensure that policy and procedures are kept up to date.
- The Director will ensure implementation of the Asbestos Management Policy across all teams to ensure consistency of approach.
- The Director, in liaison with the HR Manager, will ensure all relevant staff receives the appropriate training and refresher courses.
- The Director will ensure that adequate financial and staff resources are available to implement this policy

### **Team Leader - Asset Management**

Day to day implementation of this policy, including responsibility for maintaining the Asbestos Register and Management Plans is delegated to Team Leader – Asset Management

Staff will have 'read only' access to the Register and Management Plan but only the Team Leader – Asset Management or the Director of Asset Management may make changes to these documents.

### **Managers**

- Managers are responsible for ensuring that their teams are aware of relevant procedures and that the procedures are being carried out.
- Managers should be aware of the Emergency Procedures (see Section 10.0) should asbestos be discovered in a property, and implement those procedures immediately.

## **Asset Management team – see Appendix A Process Map – Planned Works**

Main duties of the Asset Management team:

- Responsibility for implementing the Asbestos Management plan, including annual surveying of ACMs to monitor condition.
- Organise Refurbishment & Demolition surveys prior to any disruptive work and ensure this information is passed to the Principal Designer /Contractor for the project, and copied to any subcontractors.
- Arrange for sampling of any suspicious materials found by staff during surveys / inspections

## **Property Services team –see Appendix B Process Map - Repairs**

Main duties of the Property Services team:

- Ensure they have read this manual and follow the guidance within it
- Ensure that day to day contractors are aware of the procedure that Langstane employs for communicating the presence of ACMs in properties and that contractors in turn are passing on asbestos information to their employees
- Ensuring that they check the asbestos register and provide relevant information to contractors where a property has an asbestos warning against it (see Section 5.0)
- Ensure that the Asset Management team is notified of any works carried out to properties that may require to be recorded in the Register
- Ensure that when a tenant asks permission to alter their property, that property is checked on the asbestos register and that a standard letter is used when responding (staff should refer to Asbestos Procedure 2 for further guidance on how to deal with a tenant alteration application)

## **Housing Services**

Main duties of Housing Services staff will include:

- Ensuring that they check the asbestos register and provide relevant information to contractors where a property has an asbestos warning against it (see Section 5.0)
- Ensure that tenant enquiries about asbestos in their property are passed to Asset Management.

## **Voids team – see Appendix C Process Map – Void Works**

- The Voids team inspectors must be alert to the possibility of asbestos in properties that they are pre and post-inspecting and must notify Asset Management if they have any concerns about suspected asbestos.
- The Voids team must ensure that a Refurbishment & Demolition survey is carried out prior to any disruptive works being undertaken in a void property, including kitchen,



bathroom and heating replacements. A copy of the survey must be given to Asset Management to allow the Register to be updated

- Where ACMs are found in the Refurbishment & Demolition survey, the Voids team should liaise with the Asset Management team to agree the best way of managing those ACMs during and after the works.

### **Allocations team**

The allocations team should ensure that new tenants are provided with a copy of the asbestos register entry for their domestic property (where one exists) and a copy of the Asbestos Leaflet.

### **DLO / Handyman**

Main duties of the DLO / Handyman

- Ensure that they have a paper copy of the Asbestos Register in their van at all times, and that they refer to the Register prior to entering a property.
- The DLO will be issued with updates for the register from the Asset Manager or the Team Leader (Property Services) and should ensure that these updates are inserted into their copy of the Register.
- DO NOT carry out any repairs that will disturb or damage ACMs that are highlighted in the Register
- Be alert to the possibility of ACMs within properties, even if the Register indicates none are present.
- Stop work immediately if they come across a suspicious material, and should be aware of the Emergency Procedures to be carried if the suspicious material has been disturbed.
- DLO will be issued with an emergency kit in case of accidental damage of a suspicious material – this should be checked regularly and replenished as required. Appendix F contains the Asbestos De-contamination checklist that the DLO must follow.

## **7. Staff training**

In order to comply with Regulation 4 of CAR 2012, and to ensure that staff can fulfil their responsibilities, the Director of Asset Management, assisted by the HR Manager, will ensure that a training programme is in place as follows:

Asbestos Awareness training by a UKATA approved provider will be given to:

- Staff who carry out maintenance works
- Staff who carry out inspections of properties
- Staff who supervise contractors
- Managers / Team Leaders of the above staff

- Annual refresher training will be given to staff who carry out maintenance works. For other staff, refresher training will be provided every three years.

In-house training, covering this policy and associated procedures will be given to:

- All staff who raise works orders or instruct contractors to carry out work
- Allocations staff
- Staff who may be taking calls tenants enquiring about asbestos in their homes

If staff feel they require additional training in order to fulfil their responsibilities they should advise the Director of Asset Management who will arrange this accordingly.

## 8. Working with ACMs

### 9. Work that does not require a licence

In most instances, carrying out maintenance, removal and disposal of ACMs will require to be done by a licensed contractor but there are occasions when the work can be carried out without a license, for instance where it involves:

- Textured coatings - artex
- Vinyl floor tiles
- Gaskets
- Textiles – fire blankets etc.
- Single electric & gas components such as storage heaters and boilers

However, this work still requires to be carried out by a person with Non Licensed Asbestos Works training.

At present no employee of Langstane has undertaken this training and **on no account should any member of staff attempt to work on or remove ACMs.** Where non-licensed works are required Langstane will employ the services of a specialist contractor in accordance with section 9.4 of this policy.

Non-licensed works must be carried out in accordance with:

- the HSE Essential task manual
- CAR 2012

In some instances non-licensed works will be notifiable, meaning the HSE will need to be given a 14 day notice period following submission of HSE Form ASB NNLW1. This form should be submitted by the licenced contractor along with their Plan of Work.

## 10. Work that does require a licence

Work that does require a licence should only be carried out by an approved licenced contractor. The HSE will need to be given a 14 day notice period following submission of form HSE ASB5.

The work must be carried out in accordance with:

- CAR 2012

The contractor must produce a Plan of Work including all necessary method statements and risk assessments. The plan must include the proposed asbestos stripping technique and an assessment of the likely exposure to the contractor's employees, together with emergency procedures. The Director of Asset Management, as dutyholder, must check the contractor's method statement and risk assessments or delegate this to the Associations CDMC / asbestos consultant to do on their behalf. The contractor should not start work until they have been notified in writing that the Plan of Work and method statements are acceptable.

Where licenced works are required it is likely that tenants will require to be decanted for the duration and the Asset Management team should work with the contractor and CDMC to agree the extent of decanting required.

## 11. Where ACMs are being removed

Removal of asbestos is hazardous and will only be carried out where there is no other safe way of managing the asbestos.

The contractor must employ an on-site supervisor who holds a valid training certificate (minimum P405) in supervising asbestos removal works. Depending on the scope of works, Langstane may instruct their asbestos consultant to manage the works on Langstane's behalf.

The contractor is to adhere to the current approved control levels and action limits when working with asbestos. All required PPE and decontamination units will be provided by the contractor to their employees and anyone found not wearing appropriate PPE will be required to leave the site.

Following the asbestos removal works the contractor will arrange suitable air testing and appropriate certification must be produced prior to any reinstatement works starting. Air tests must be carried out by a UKAS accredited organisation complying with ISO 17025 and in accordance with the HSE 248 'Asbestos: the analysts guide for sampling, analysis and clearance procedures'.

## 12. Approved Contractors and Consultants

In accordance with HSG 227, Chapter 2 of HSG 264 and CAR 2012, Langstane will require all consultants and contractors engaged to work in any capacity with asbestos to be:

- Adequately trained and have relevant experience;
- Able to demonstrate independence, impartiality and integrity;
- Have an adequate quality management system; and
- Carry out their duties in accordance with the regulations and guidance relevant to their field of work.

Langstane will ensure that any contractor or consultant engaged meets these criteria prior to the commencement of any work and may consult the HSE Prosecutions and Notices databases to search for records of conviction, prohibition and improvement notices.

Any or all of the following may be included when carrying out a competency check for a contractor or consultant:

- Audit of company health and safety records
- Audit of staff training
- References
- Insurances
- Health and Safety policy

The performance of the approved contractors in relation to their management of asbestos remedial / consultancy works will be monitored as necessary.

Langstane will use separate consultants for removal and surveying to avoid a conflict of interest.

## 13. Emergency situations

This section should be read in conjunction Asbestos Procedure 4 - Emergency Procedure and Flowchart (Appendix D)

Langstane does not expect staff to put themselves in danger and as such this policy is based on mitigation of risk by ensuring that all staff and contractors are given as much detail as possible about the location of asbestos in Langstane properties. In-house staff and contractors are advised to stop work if they feel they may disturb or damage an ACM while carrying out a repair.

There is always a small risk that asbestos is present in a property, and has not been picked up by a survey, and so staff are advised to stop work immediately if they suspect a material contains asbestos. Staff should report suspicions to the dutyholder / delegated person who will arrange for sampling to be carried out prior to work resuming.

However, all in-house staff carrying out maintenance work in Langstane properties must be familiar with the Asbestos Procedure 4 - Emergency Procedures so that they know what actions to take if they accidentally damage a material which they suspect may contain asbestos. The Emergency Procedures are a simple set of actions which should help to reduce the risk of fibres being spread in the event of an ACM being damaged.

#### **14. Monitoring and Review**

The policy will be reviewed every three years or where a change of legislation or best practice necessitates a revision.

The Director of Asset Management will carry out periodic audits of asbestos procedures to ensure that they are being followed.

#### **15. Equality and diversity**

The Langstane Group / Langstane Housing Association is committed to promoting equality and diversity across all areas of work. Discrimination or harassment of any kind is not tolerated.

#### **Right to complain**

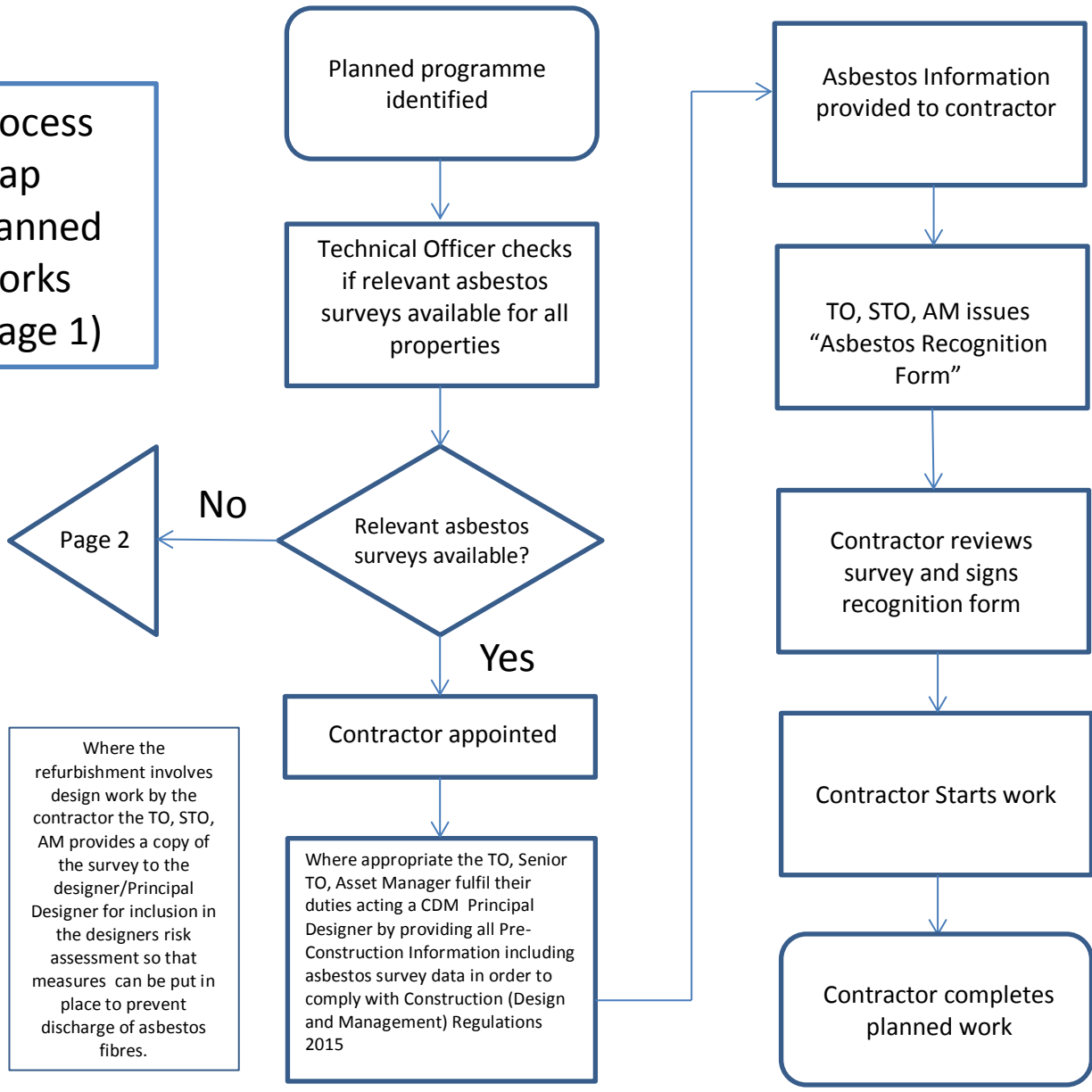
In the event you are not satisfied with the service you have received, please contact the Association for a copy of the Complaints Policy. This can also be viewed on Langstane Housing Association's website – [www.langstane-ha.co.uk](http://www.langstane-ha.co.uk).

If you would like this document sent to you in large print, please contact Support Services on 01224 423000.

Langstane Housing Association Ltd is a registered Scottish Charity No. SC 011754, a registered Property Factor No. PF 000666 and a registered Letting Agent No. LARN2001005



Process Map  
Planned Works  
(page 1)



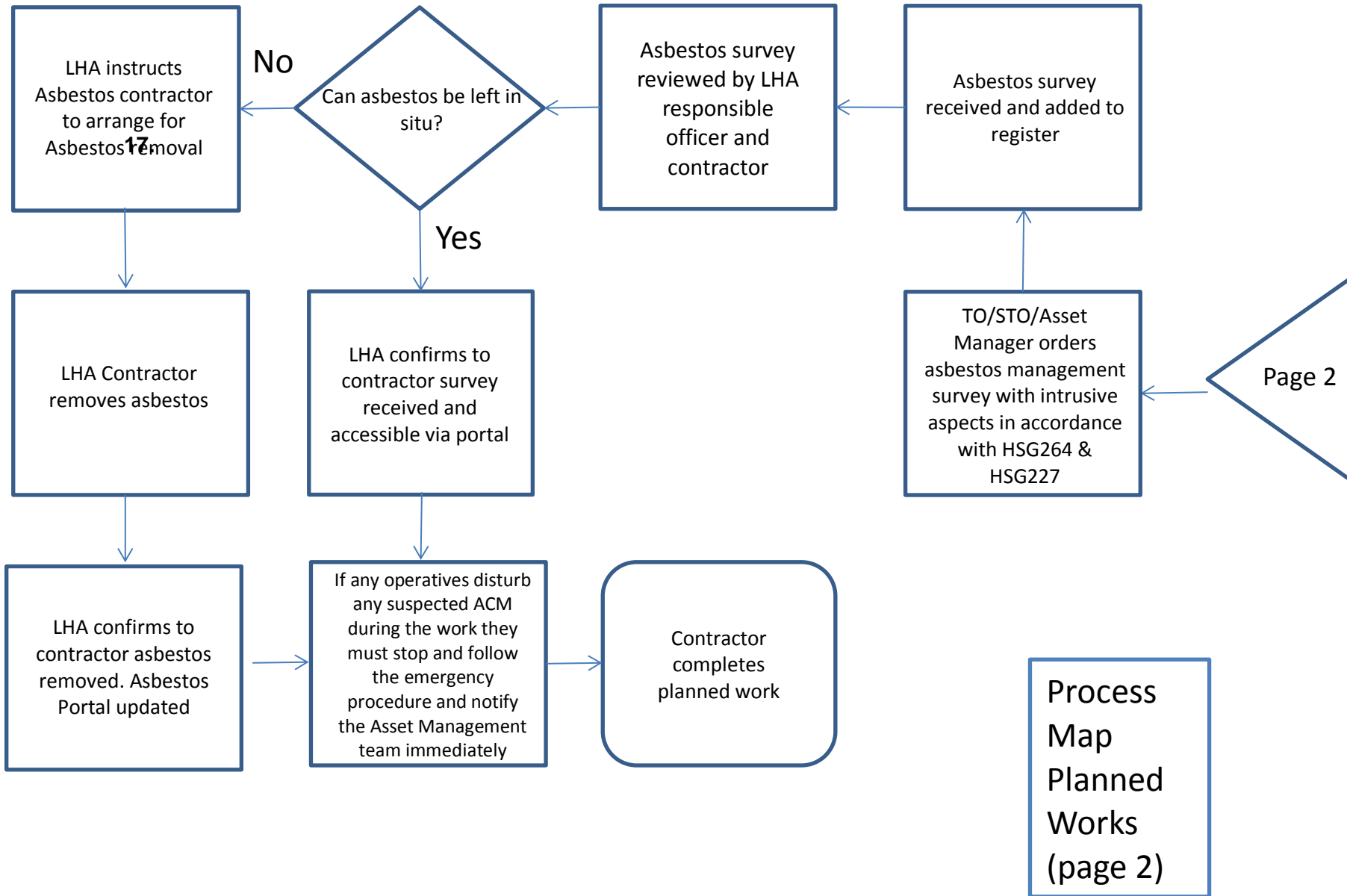
Where the refurbishment involves design work by the contractor the TO, STO, AM provides a copy of the survey to the designer/Principal Designer for inclusion in the designers risk assessment so that measures can be put in place to prevent discharge of asbestos fibres.

1. Appendix A – Process map – Planned Works

Contractors sign to confirm they know how to access asbestos information relating to the site they are working on and that they have appropriate measures in place

Contractor manages work in line with survey results

If any operatives disturb any suspected ACM during the work they must stop and follow the emergency procedure and notify the asset management team immediately



17

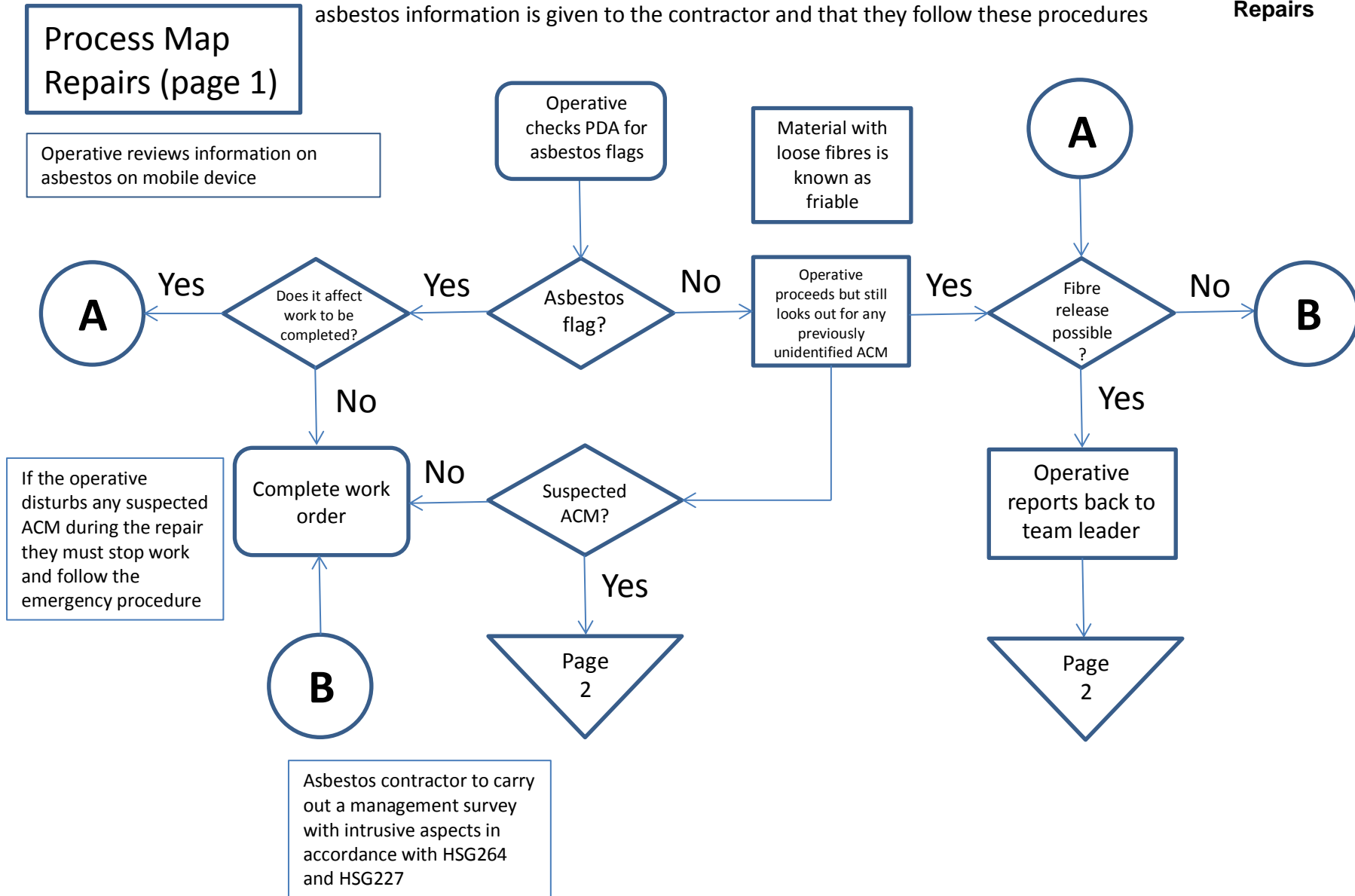
Asbestos

Process Map Planned Works (page 2)

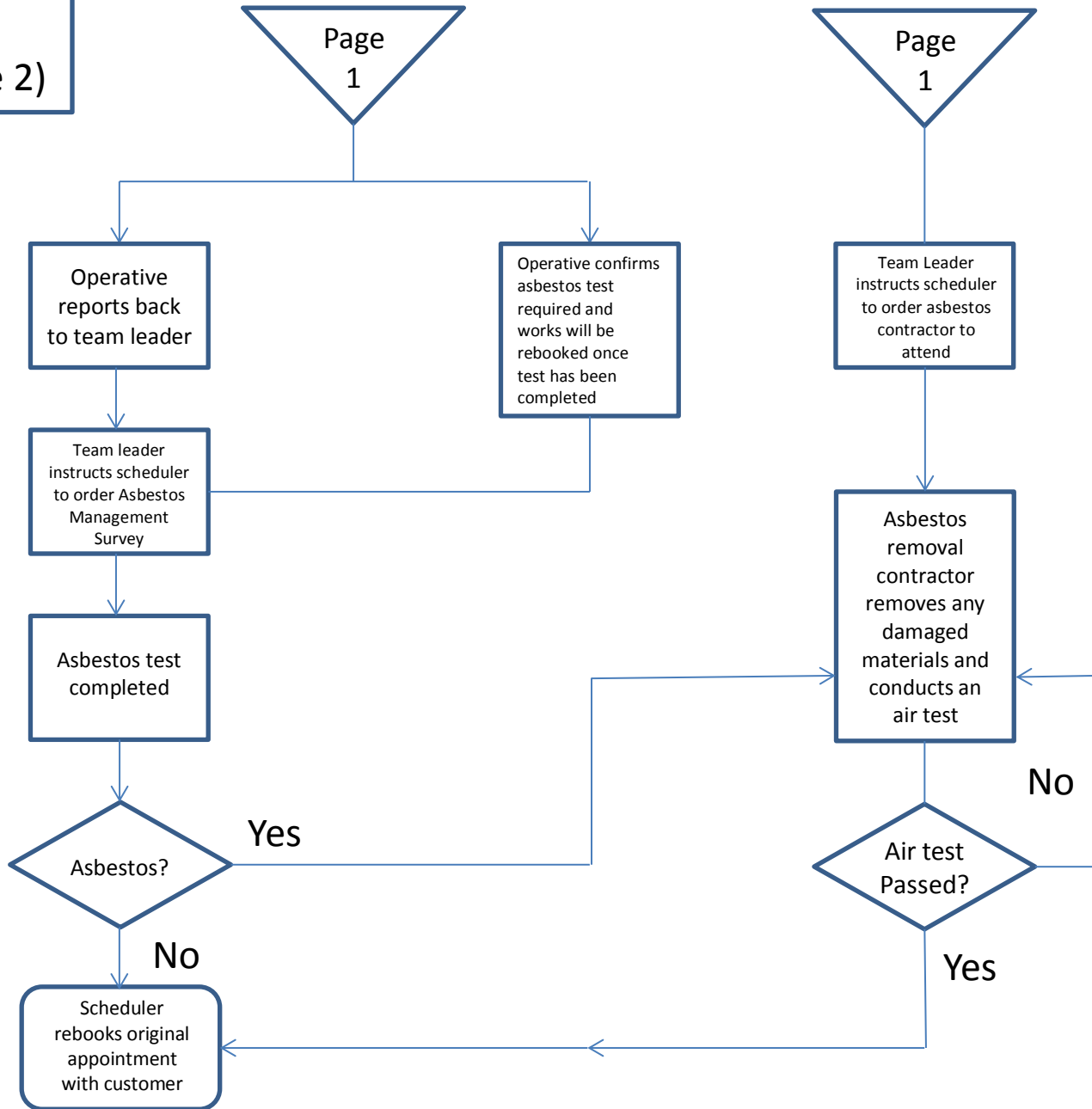


2. Appendix B –  
Process map –  
Repairs

Where work is sub-contracted out Property Services ensures that access to our asbestos information is given to the contractor and that they follow these procedures

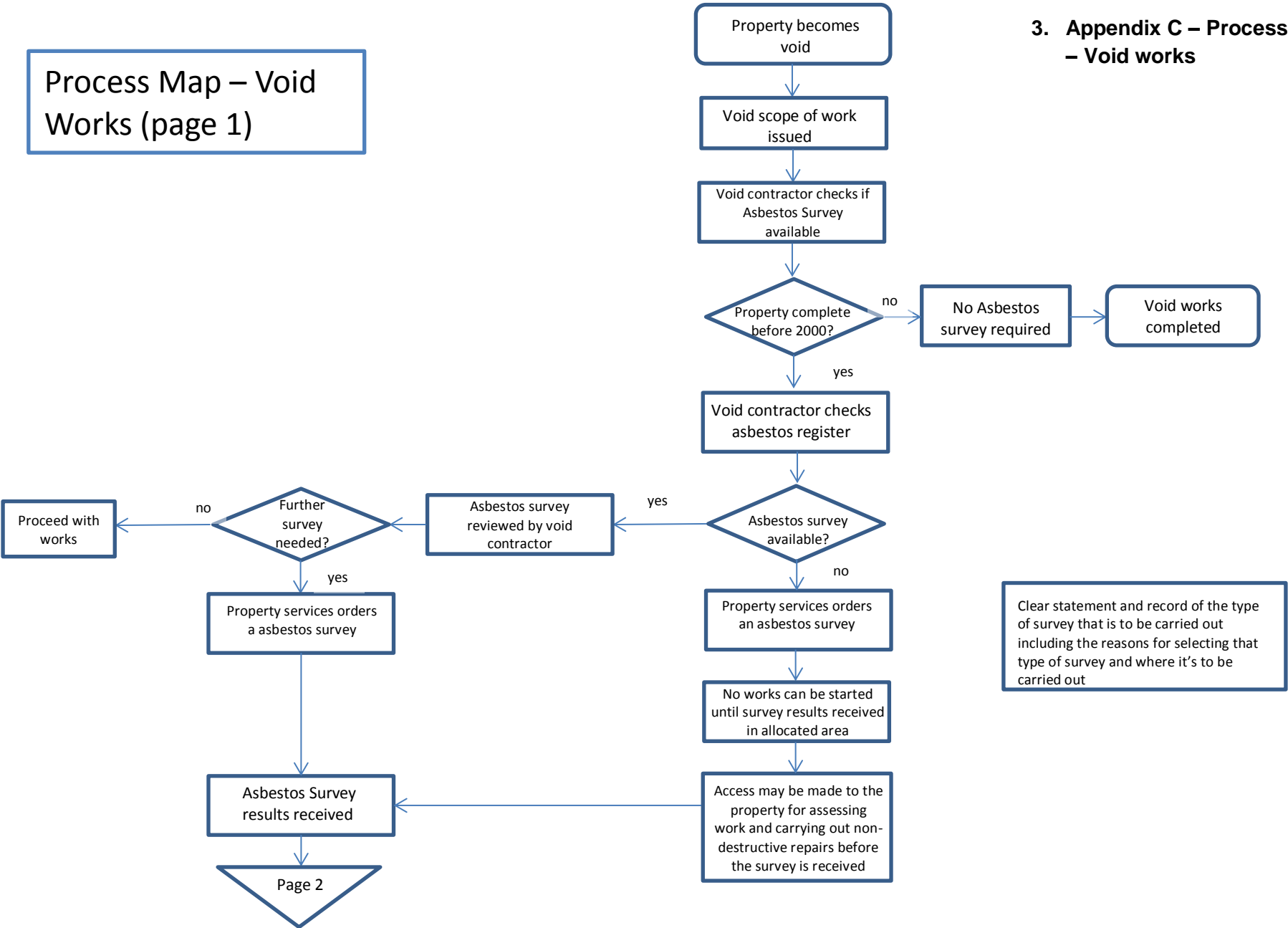


Process Map  
Repairs (page 2)



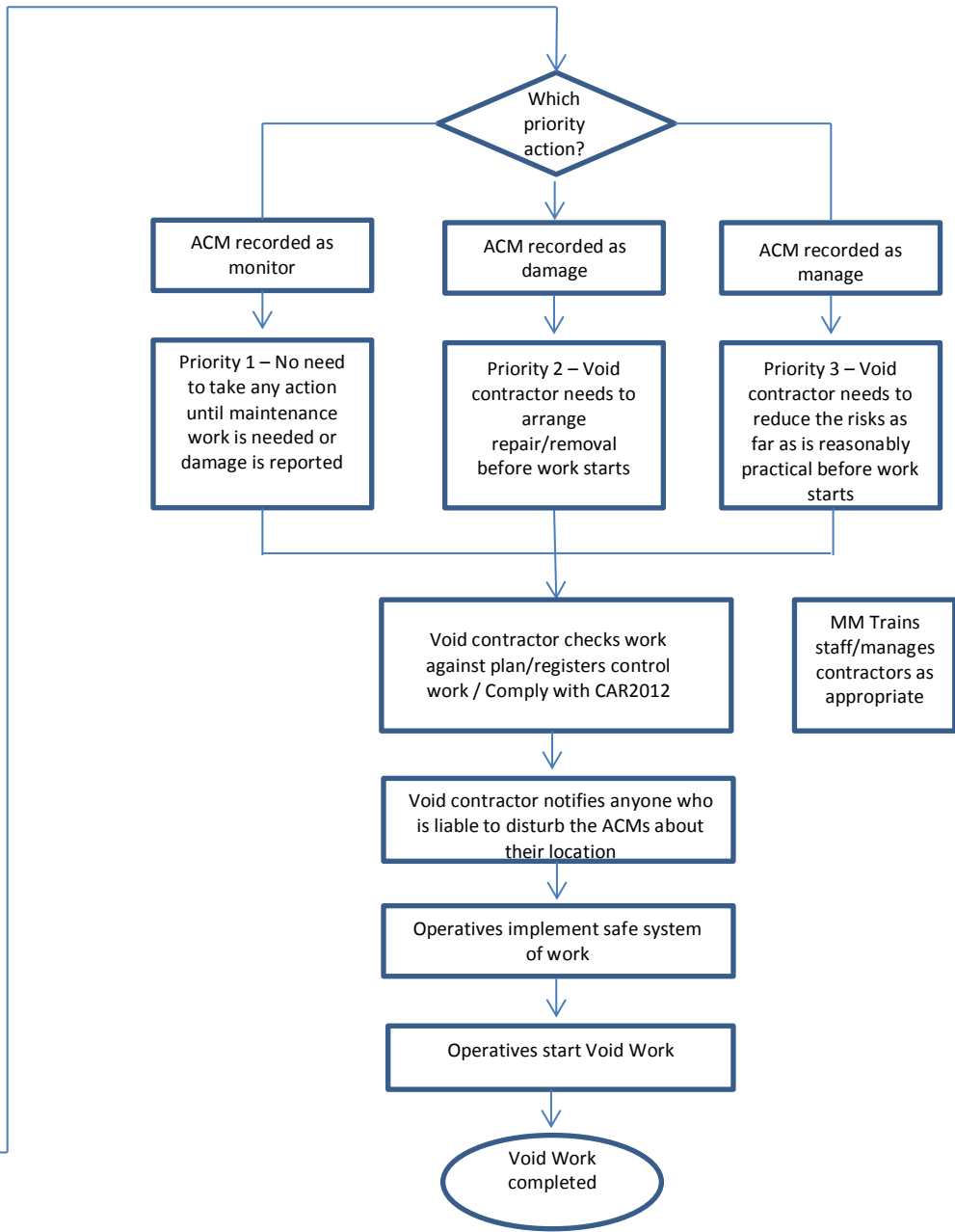
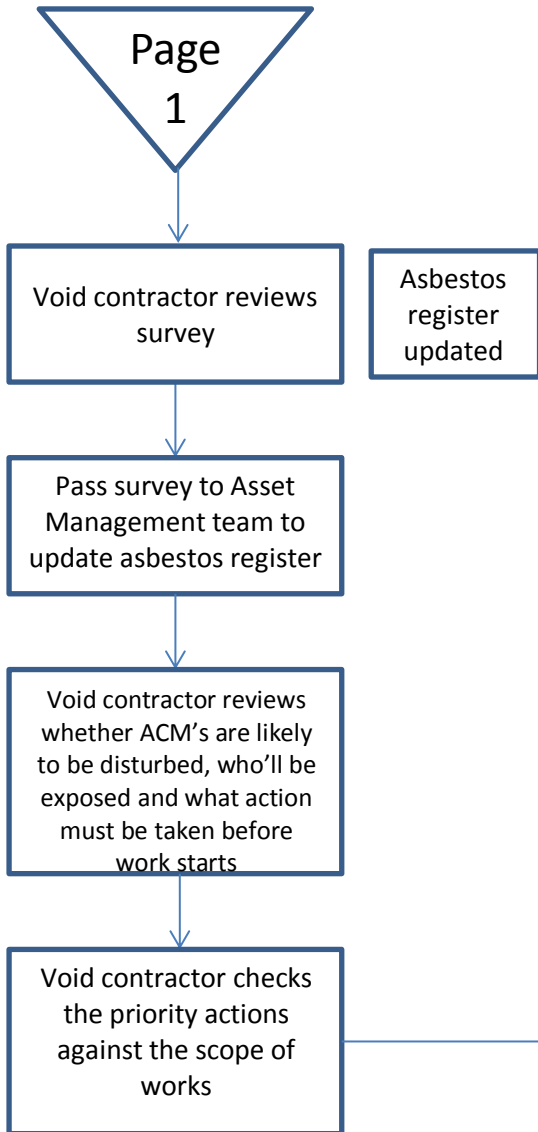
Process Map – Void Works (page 1)

3. Appendix C – Process map – Void works



Clear statement and record of the type of survey that is to be carried out including the reasons for selecting that type of survey and where it's to be carried out

# Process Map – Void Works (page 2)



## **Appendix D - Emergency procedures – Refer also to Asbestos Process Maps**

If the Asbestos Register is referred to by contractors & staff prior to carrying out work this will reduce the risk of disturbing asbestos accidentally. However, staff and contractors should remain alert to the possibility that asbestos may be present in properties, even if the Register shows the property contains no ACMs, particularly in difficult to access areas.

### **Prior to carrying out any repair**

Prior to carrying out any repair, operatives should always carry out a dynamic risk assessment taking into account a variety of factors to assess the likely risk of carrying out the repair. One of the factors to be considered is the likelihood of ACMs being present. Operatives should always refer to their asbestos register before entering a property. Some domestic properties have asbestos register entries whilst others do not. All non-domestic properties should have an asbestos register entry. If a property doesn't have an entry but is pre-2000, or the entry shows ACMs present, it is recommended that you take your decontamination kit with you when you enter the property so that it is close to hand if you come across a material you have any concerns about.

### **Action to be taken if suspicious material is found but not disturbed during non-asbestos works**

When asbestos containing materials is found during non-asbestos works but is not damaged:

- Work must stop
- Ensure that the ACM is not at risk of being damaged
- Contact the Asset Management Team Leader for advice.

The Asset Management team will arrange for sampling to be carried out of any suspicious materials and any work that risks disturbing the material should be postponed until sampling results are received.

Once sampling results are received the material can either be dealt with as a non-asbestos material if the samples are clear, or a management plan will be put in place in the normal way if the material is found to be an ACM and the register will be updated accordingly.

### **Action to be taken if a suspicious material is damaged or disturbed during non-asbestos works.**

When a suspected ACM is damaged during the course of non-asbestos works, work must stop after any necessary steps have been taken to prevent a risk to health or further damage to the material.

If it is likely that fibres have been released into the area the following steps should be taken:

- Stop work
- Ask occupants to leave the property and isolate the immediate area by, for example, closing the door

- Contact the Asset Management Team Leader or Asset Manager or your own Manager for further advice.
- If it is safe to do so, collect a sample of the material but do not break off or damage the material further.
- If you have dust or fibres on your clothing, leave the immediate area but do not leave the property as moving through the building could spread fibres.
- If your decontamination kit is in your vehicle, stay put and wait for your Line Manager or a nominated staff member to bring your kit to you. This will be passed through a door or window. Follow the instructions in your decontamination kit.
- If you have your decontamination kit with you, follow the instructions in your kit.
- Put on your FFP3 face mask, spray clothing with a water spray to avoid fibres becoming airborne, then remove clothing and, if possible, shower in the order set out in your decontamination checklist.
- Complete Asbestos Incident form at send to the Asset Management Team Leader.

All maintenance operatives will be issued with an emergency kit for use in situations where asbestos has been disturbed. Operatives must follow the de-contamination checklist procedure in the kit. This kit will include:

- De-contamination checklist
- Disposable over clothes
- Water spray
- Scissors
- Latex free gloves
- FFP3 Face mask
- Plastic bags for clothing
- Plastic bag for sample
- 'Warning asbestos' tap

Asset Management will arrange for sampling of the suspicious material to be carried out. Until sample results are received the area should remain unoccupied.

Once sample results are received:

If the material is not an ACM the area can be occupied and work can continue. An incident report (see Appendix should be completed and a copy provided to the HR Manager to register as a 'near miss'

If the material is confirmed as an ACM:

- Asset Management will arrange for a specialist contractor to carry out repair or removal of the ACM in accordance with this policy.
- An incident form must be completed and a RIDDOR report must be submitted to HSE as a dangerous occurrence
- affected employee/s should be provided with a copy of their decontamination checklist (appendix F) and incident report (appendix G) and advised to hold copies indefinitely. Copies of these forms should be held in the employee/s HR file
- depending on the extent of the spread of fibres, clothing, soft furnishings etc may need to be disposed of as asbestos waste.
- specialist cleaning should be undertaken and air testing carried out to ensure the property meets recommended air levels prior to reoccupation.