

Growth and Place Directorate (GPD)

ASBESTOS MANAGEMENT PLAN

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|---------------------------|-------------------------------------|
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| Resident Sign-off | |
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1. SCOPE OF ASBESTOS MANAGEMENT PLAN

OVERVIEW – this section outlines the scope of this Asbestos Management Plan and the high level aims of the Plan and details the legislation and other documentation that it relates to.

1.1 Scope of this Asbestos Management Plan

London Borough of Hammersmith and Fulham (LBHF) Growth and Place Directorate (GPD) is committed to the effective management of asbestos and recognises its duties under the Health & Safety at Work Act, 1974 and the Control of Asbestos Regulations 2012, the Defective Premises Act 1972 and the Landlord and Tenant Act 1985 together with all associated Approved Codes of Practices.

The Council also recognises its responsibilities to Contractors and others involved in building and maintenance projects established through the Construction (Design and Management) Regulations 2015 and its duties as the 'Duty Holder' of sites owned, occupied or operated by the Council, as defined by Regulation 4 of the Control of Asbestos Regulations 2012.

This Asbestos Management Plan sets out LBHF GPD's strategy for compliance with all current relevant Health & Safety legislation relating to asbestos, in conjunction with the LBHF GPD Asbestos Management Policy.

This Asbestos Management Plan:

- Must be read in conjunction with the LBHF GPD Asbestos Management Policy
- Must be read in conjunction with the Asbestos Register
- Applies to all properties for which LBHF RPHS has Dutyholder responsibilities as defined by regulation 4 of the Control of Asbestos Regulations 2012, including both domestic and non-domestic areas
- Relates to all identified, presumed or suspected Asbestos Containing Materials (ACMs) at sites owned, occupied or operated by LBHF GPD
- Is applicable to all staff, contractors, volunteers and other persons whose duties may bring them into contact with Asbestos Containing Materials (ACMs) including all residents (tenants and leaseholders) residing in LBHF GPD properties
- Requires the cooperation of all staff, contractors and other site users, in line with their individual responsibility to maintain a safe, healthy working environment at all times
- Is mandatory for all parties involved.
- must be available for inspection by anyone reasonably requiring it including external contractors, enforcing agencies and emergency services.

This Asbestos Management Plan replaces any previous management plans that may already be in circulation for LBHF GPD.

1.2 Aim of Asbestos Management Plan

The aim of this AMP is to:

1. Control the risk of exposure to asbestos fibres
2. Ensure compliance with all relevant legislation by:
 - Detailing how GPD will ensure that all persons who have responsibility for managing, organising, or carrying out works, including contractors, are sufficiently competent and have had sufficient training

- Detailing how GPD will determine the location of materials likely to contain asbestos
- Detailing how GPD will maintain an up to date record of the location and condition of known or presumed asbestos ('The Asbestos Register') together with its risk
- Detailing how GPD will ensure that the condition of any material containing or presumed to contain asbestos is periodically assessed
- Detailing how GPD will provide information on the location, condition and risk of asbestos containing materials to contractors prior to work taking place and to anyone else who may need it, including how workflow processes will be managed
- Detailing how GPD will manage asbestos removal and remedial work
- Detailing procedures for safe systems of work and dealing with asbestos emergencies

2. MONITORING AND REVIEW OF THIS PLAN

OVERVIEW – this section describes the mechanism for regular monitoring of the plan, along with details for an annual review of the plan.

2.1 Compliance Monitoring and Auditing of Processes

Compliance with the processes detailed within this plan will be monitored via monthly KPIs and performance measures. There will also be a series of audit checks carried out to spot check adherence to processes by both contractors and in-house staff.

2.2 Annual Review

This Plan is to be reviewed six months after approval or sooner if there are changes to legislation, best practice or internal arrangements which mean it may no longer be valid.

The review will critically review all the management processes and their effectiveness as well as the overall progress made and will include;

| | |
|--|--|
| Effectiveness of current management plan | <ul style="list-style-type: none"> ▪ in preventing exposure ▪ in controlling maintenance workers/contractors ▪ in highlighting the need for action to repair/remove ACMs ▪ in raising awareness among all employees |
| Issues which may affect the management plan | <ul style="list-style-type: none"> ▪ changes to the organisational structure and/or staff ▪ resourcing the management plan ▪ changes to Council procedures ▪ relevant major incident |
| Suitability of procedures | <ul style="list-style-type: none"> ▪ for accessing asbestos information ('the register') ▪ for updating the register following surveys and removal work ▪ for reinspections of known asbestos ▪ for communicating with residents ▪ for addressing asbestos risk as part of each workstream (safe systems of work) |
| Instances of failure of the procedures | <ul style="list-style-type: none"> ▪ where procedures have not been followed and why not ▪ where procedures have been inadequate and why ▪ where exposure to airborne asbestos fibres has occurred ▪ lessons learned following incidents or accidents |

It is the responsibility of the Asbestos Manager to review this plan as agreed and to recommend such updates as are required to maintain it in accord with existing legislation and regulation. It is expected that the Asbestos Manager's recommendations will be approved in a timely manner in accordance with the Council's internal decision-making processes and the plan updated accordingly.

Due to the introduction of a new asbestos register in Geometra, due in 2018, the initial review for this plan has been set at 6 months.

3. ROLES AND RESPONSIBILITIES

OVERVIEW – this section outlines the job titles, roles and clear lines of responsibility for each person involved in the management of asbestos.

3.1 Councillors

- Councillors must ensure that suitable arrangements are in place for the management of the asbestos throughout the councils' portfolio and that there are sufficient resources to discharge these duties effectively.

3.2 Chief Executive

- The Chief Executive is legally responsible for ensuring that the arrangements in place for the management of asbestos containing materials are suitable and sufficient.
- The Chief Executive is accountable for the facilitation, implementation, and adherence to this policy, including the allocation of sufficient resources and funds.
- The Chief Executive retains accountability as the “responsible person” within the scope of the relevant legislation.
- The Chief Executive will delegate the responsibility for implementation of this policy to the Strategic Head of Property Services as appropriate and in line with the GPD Asbestos Management Plan.

3.3 Assistant Director, Property and Compliance

The AD Property and Compliance will undertake practical application of the Policy within their areas of responsibility, delegating duties as appropriate, ensuring that:

- Suitable and sufficient risk assessments are carried out for their areas of responsibility and subsequent actions implemented as appropriate
- Resources and equipment are correctly used and maintained
- Identify and facilitate training in accordance with the requirements of this policy
- Systems are periodically reviewed and tested; ensuring that failures and shortcomings are reported and addressed
- All staff in their control are made aware of the requirements of this policy and any amendments made to it
- All staff and officers are fully supported in decisions made in accordance with this policy
- The Asbestos Policy is relevant to all assets falling within the remit of the Strategic Head of Property Services and is signed and dated
- Managing all contact with press, enforcing authorities, and legal queries with respect to asbestos or asbestos exposure
- Reviewing and, where appropriate, implementing recommendations received by the Health and Safety Manager and/or the findings of any audit or review
- Monitor performance of contractors against key performance indicators and report to Lead Director
- Leading enforcement action on non-compliant contractors

3.4 Head of Health and Safety Compliance

The Head of Health and Safety Compliance is responsible for:

- Ensuring that the G&P asbestos policy complies with the overarching LBHF corporate asbestos policy
- Ensuring that the Asbestos Management Plan (AMP) and associated appendices are integrated into the G&P operating procedures
- Participating in regular AMP reviews
- Providing advice and information to the Strategic Head of Property Services and, through liaison with the Asbestos Manager/asbestos specialist contractor, ensuring that instructions received from the Strategic Head of Property Services are implemented
- Facilitating audits carried out by the Asbestos Manager, Health and Safety and/or commissioned party
- Ensuring that the implementation of the AMP is monitored to ensure that working arrangements and provision of financial, technical, human, and other resources are suitable and sufficient to meet its requirement
- Monitoring quality control and performance and reporting on key performance indicators
- Monitoring and reporting on asbestos training
- Monitoring that contractors including Mitie and ACE are following procedures
- Reviewing and, if appropriate, implementing recommendations received from the Health and Safety Manager or any other audits or reviews of asbestos management
- Reporting non-compliance/deficiencies to Strategic Head of Property Services
- Investigating and reporting on ACM exposure incidents
- Reporting incidents to the Health and Safety Executive under the Reporting of Injuries, Diseases, and Dangerous Occurrences (Amendment) Regulations 2012 (RIDDOR)
- Participating in all meetings with the HSE or enforcement bodies and assisting managers in providing details on the GPD asbestos policies, procedures, and management plan to enforcement bodies where requested.

3.5 Asbestos Manager (Duty Holder's Nominated Responsible Person)

To help comply with the legal requirements and to ensure that ACMs are properly managed, GPD as the dutyholder, has identified a person within the organisation who will be responsible for that management. The appointed person has the resources, skills, training and authority to ensure that the ACMs are managed effectively. The Asbestos Manager is the Duty Holder's nominated representative and is responsible for the day to day operational management of asbestos including;

- Contract Management of Asbestos Surveying and analytical Company
- Ensuring that the Asbestos Register is maintained and updated including risk assessments and ensuring that there is a quality control process in place
- Ensuring that regular re-inspection surveys are undertaken in line with the intervals specified in the Asbestos Management Plan
- Ensuring that any ACMs that are high risk are removed or encapsulated so as to reduce their risk
- Ensuring that records of asbestos remedial works are kept
- Providing general technical advice on asbestos to GPD team

- Providing Key Performance Indicator (KPI) data for monthly reporting
- Undertaking an auditing role on representative projects and the Asbestos Management Plan, including the performance of the Asbestos Contractors, and Asbestos Analysts/Surveyors.
- Ensuring that emergency procedures are established, implemented, and remain appropriate for the RPHS
- Ensuring that all work is halted if suspect ACMs are discovered during work and if required further advice is sought from the Asbestos Surveying Company
- Ensuring any breaches of compliance with the Asbestos Management Plan and the Control of Asbestos Regulations are fully investigated and that Corporate Health and Safety are notified. All incidents and accidents are recorded on the Council's online reporting system
- Ensuring that health surveillance is carried out where appropriate and necessary
- Maintain a competent person status in matters of asbestos management.

3.6 Staff

All staff will ensure that they:

- Comply fully with the principles and actions required in this document
- Correctly utilise all systems and equipment provided for compliance with this document, including the reporting of any apparent defects with the equipment or systems
- Ensure the safety, health and welfare of themselves and others who may be affected by the employees' acts or omissions
- Discuss with their line manager any issues or concerns arising with or about this policy
- Bring to the attention of the senior management and the health and safety advisor any matters that are not resolved in a reasonable time
- Undertake training as required
- Understand what to do in an emergency and how to report an incident

3.4 Contractors

GPD has a term partnering contract (TPC) with a contractor, Mitie, which runs from 2013 through to 2023, with the potential to extend for a further 5 years. GPD has a contract with ACE for asbestos surveys and analytical services. Additional contractors are employed either via Mitie or directly by GPD. Contractors are responsible for the following:

- To only use Licensed Asbestos Removal Contractors for work on all asbestos materials, whether licensable or non-licensable.
- To only use UKAS accredited laboratories for air testing and bulk sample analysis
- To undertake appropriate training, including asbestos awareness training and to provide evidence to demonstrate this
- To access the G&P Asbestos Register prior to undertaking any work which may disturb asbestos
- To carry out all work, risk assessment, notifications and reporting to the council for all areas relating to asbestos in accordance with the regulations, the G&P Asbestos Management Plan and any contract in place
- To report any incidents immediately and to follow the processes included in this plan

3.8 G&P Health and Safety Team

- Coordinating any training needs assessment for all members of staff and facilitating the Asbestos Manager or external asbestos specialist to deliver relevant Asbestos Awareness Training
- Managing and collating Accident Book/corporate incident reporting system records and Dangerous Occurrence records
- Undertaking inspections and audits to ensure adherence to this Policy and the Asbestos Management Plan and to make recommendations as applicable.

3.9 Corporate Health and Safety Team

The Corporate Health and Safety team shall:

- Consult with the appropriate Senior Management Team on asbestos related matters;
- Auditing and inspection against compliance with this policy;
- Inform relevant Director of any non-compliance; and
- Report findings to Strategic Leadership Team, Cabinet Member and Audit Committee

3.10 Specialist Advice

As required, G&P will engage the services of specialists to provide advice on asbestos matters, either via the existing supply chain or external consultants.

3.11 Key Asbestos Management Roles


| | |
|---|--|
|  | Strategic Head of Property Services Chris Culleton chrisculleton@lbhf.gov.uk 020 8753 1052 |
|---|--|

| | |
|---|---|
|  | Head of Health and Safety Compliance Chris Wood chriswood@lbhf.gov.uk 0208 7534 871 |
|---|---|

| | |
|---|--|
|  | Interim Asbestos Manager Stephen Brittain stephen.brittain@lbhf.gov.uk 020 8753 6454 |
|---|--|

| | |
|---|--|
|  | ACE Surveying and Analytical Services Contractor Rebecca Madden - Project Admin Rebecca.madden@aceconsultants.co.uk 01375 366874 Emergencies: operations@aceconsultants.co.uk Out of hours Emergencies: 07803201267 |
|---|--|

| | |
|---|---|
|  | Mitie Term Partnering Contractor 0800 023 4499 |
|---|---|

| | |
|---|---|
|  | Alltask Licensed Asbestos Removal Contractor Contact via Mitie |
|---|---|

4. TRAINING AND COMPETENCY

OVERVIEW – Under Regulation 10 of Control of Asbestos Regulations 2012 (CAR), employers are required to ensure that anyone who may disturb asbestos during their work or who manages or supervises these staff receive appropriate information, instruction and training to ensure that they understand the risks associated with working with asbestos and can undertake the work safely.

This section outlines how training needs will be identified, how asbestos awareness training will be delivered for employees and the requirements for additional asbestos training for specific employees. It also details how competency of contractors will be assessed and managed including those undertaking asbestos removal work and consultants/laboratories undertaking asbestos surveys, testing and air monitoring.

4.1 Identification of Training Needs

The Head of Health and Safety Compliance is responsible for ensuring that GPD Staff are provided with suitable and sufficient training appropriate to their involvement with asbestos and in line with their responsibilities under this management plan.

The type of training required is dependent on the role undertaken. Workers and supervisors must be able to recognise asbestos-containing materials (ACMs) and know what to do if they come across them in order to protect themselves and others. Two different levels of training will be provided;

- Asbestos Awareness Training
- Asbestos Management Training

Additionally, training will be carried out in the specific processes and procedures in place to manage asbestos at LBHF RPHS and in particular to ensure that those with named responsibilities are aware of these and understand them.

A Training Needs Analysis will be maintained by the Health and Safety Team which will identify training needs and log training completed. Generally, the following training will be provided;

| | Asbestos Awareness | Asbestos Management (e.g. P405) |
|--|--------------------|---------------------------------|
| GPD Management | ✓ | ✓ (selected staff) |
| LBHF Asbestos Manager (Appointed Person) | ✓ | ✓ (minimum requirement) |
| LBHF H&S Staff Providing Advice | ✓ | ✓ |
| GPD Staff Arranging or Supervising Work | ✓ | ✓ (selected staff) |

4.2 Induction Training

An initial assessment of training needs is undertaken at induction stage to determine what asbestos training an individual requires to undertake their role safely. If their role requires it, basic asbestos awareness training is provided to new starters as e-learning which is then followed with classroom training at the next available session. Classroom based awareness sessions are split throughout the year to ensure that new starters do not need to wait a full 12 months for a course.

4.3 Asbestos Awareness Training

Asbestos awareness training will be given to employees whose work could foreseeably disturb the fabric of a building and expose them to asbestos or who supervise or influence the work. Awareness training should also be given to those who could arrange, supervise or influence work, or those who are required to interpret asbestos information. LBHF staff who will receive awareness training include;

- Architects and Designers and others specifying works
- Building Surveyors and other LBHF Surveyors
- Project Managers and Contract Managers
- Property Compliance Team (PCT)
- Housing Officers
- Caretakers and Estate Managers
- Scheme Managers
- Leasehold Services
- Call centre staff and other 'front line' staff

Asbestos awareness training, either classroom based, via e-learning or both, will be a mandatory training course for all identified staff.

The syllabus for asbestos awareness training covers;

- the properties of asbestos and its effects on the health of individuals, including the increased risk of developing lung cancer for asbestos workers who smoke
- the types, uses and likely occurrences of asbestos and ACMs in buildings and plant
- the general procedures to be followed in the event of an emergency e.g. an uncontrolled release of asbestos dust into the workplace
- how to avoid the risk of exposure to asbestos

In order to improve understanding of the GPD Asbestos Management strategy and associated processes, training also incorporates the Council's Asbestos Policy and Management Plan, site specific procedures, where asbestos records are kept (the TEAMS asbestos portal), how to assess work against the asbestos records and designated roles and responsibilities.

It is imperative that any training also includes clear instructions of what to do in the event of a known, presumed or suspected ACM being disturbed.

All formal training is carried out by a suitably qualified UKATA, or equivalent, accredited trainer. Trainers have adequate practical experience in the asbestos sector and a theoretical knowledge of all relevant aspects of the work being carried out by GPD and associated processes.

4.4 Additional Training (for those with management responsibility etc.)

More in-depth training is required for those directly involved in the management of asbestos including assessing risk and overseeing removal work. Asbestos Management Training such as the British Occupational Hygiene Society (BOHS) P405 proficiency module 'Management of Asbestos in Buildings' is an appropriate level of training for such staff as the module is intended to provide candidates with practical knowledge and skills to manage asbestos in buildings and to provide a basic knowledge of asbestos removal procedures. A list of staff falling within this requirement will be identified and kept up to date by the Asbestos Manager under the direction of the Head of Safety Compliance.

The P405 or equivalent will be held as a minimum by the GPD Asbestos Manager as well as any other identified staff, for example, with managerial responsibility for asbestos.

4.5 General Updates

Any updates on legislation or changes in processes will be communicated via the Council's Intranet and reinforced as required using e-mail bulletins via the Asbestos Manager or Health and Safety team.

4.6 Asbestos Awareness Refresher Training

There is no legal requirement to repeat an entire formal awareness refresher training course every 12 months, however some form of refresher should be given, as necessary, to help ensure knowledge of asbestos awareness is maintained.

Refresher training will be carried out as per the following schedule;

| | | |
|--------|------------------------------|---|
| Year 1 | Awareness | Face to face (Classroom) |
| Year 2 | Asbestos Awareness Refresher | Face to face (Classroom) or E-Learning |
| Year 3 | Asbestos Awareness | Face to face (Classroom) |
| Year 4 | Asbestos Awareness Refresher | Face to face (Classroom) or E-Learning |
| Year 5 | Asbestos Awareness | Face to face (Classroom) |
| Year 6 | Asbestos Awareness Refresher | Face to face (Classroom) or E-Learning Ad Infinitum |

4.7 Training Records

Training Records for staff will be maintained by the GPD Health and Safety Team.

5. IDENTIFICATION OF ASBESTOS - ASBESTOS SURVEYS

OVERVIEW – Regulation 4 of CAR 2012 requires Dutyholders to take reasonable steps to find materials in premises likely to contain asbestos and to check their condition and to presume materials contain asbestos unless there is strong evidence that they do not.

This section outlines when and how asbestos surveys will be carried out including the strategies for surveying domestic and non-domestic premises.

5.1 Asbestos Surveying Contractor

GPD will ensure that all asbestos surveyors employed to undertake surveys on its stock are competent. This will include confirmation that surveyors;

- have sufficient training, qualifications, knowledge, experience and ability to carry out their duties in and to recognise their limitations;
- have sufficient knowledge of the specific tasks to be undertaken and the risks which the work will entail;
- be able to demonstrate independence, impartiality and integrity;
- have an adequate quality management system;
- have adequate insurances in place;
- carry out the surveys in accordance with recommended guidance; and
- Are accredited to UKAS ISO/IEC 17020:2012

LBHF RPHS has a contract with Asbestos Consultants Europe Ltd trading as ACE, for all asbestos surveying and analytical services. ACE are accredited to ISO/IEC 17020:2012 for asbestos surveying and inspection and ISO/IEC 17025:2005 for sample analysis and air testing.

The Asbestos Manager is responsible for ensuring that surveyors have the appropriate training and qualifications as well as the necessary accreditations and insurances. The performance of the surveying contractor is managed via monthly contract meetings and KPI reporting.

5.2 Asbestos Survey Standards

All surveys are undertaken in accordance with the guidance set out in Asbestos: The Survey Guide HSG 264 (HSE 2010).

The content of the survey report must, as a minimum, contain the following:

- Detail of property including photograph of outside
- Details of areas not included in the survey.
- Annotated plans of the property surveyed detailing the rooms sampled, the presence of asbestos containing materials and areas where access was not available.
- Photographs of sample points
- Survey results
- material assessment
- A priority risk assessment

- An overall risk assessment score
- Conclusions and actions
- Bulk analysis results

GPD will instruct the following different types of survey;

5.2.1 Management Surveys

A management survey is to locate, as far as reasonably practicable, the presence, extent and condition of any ACMs that could be damaged or disturbed during normal occupancy, or foreseeable maintenance and installation. Management surveys cover routine and simple maintenance work.

GPD carries out Management surveys for all communal (non-domestic) areas. Management surveys may also be carried out in dwellings where works are not planned or are minor and non-intrusive.

5.2.2 Refurbishment and Demolition (R&D) Surveys

A refurbishment and demolition survey is required before any refurbishment or demolition work is carried out and is intended to locate all the asbestos in the building (or the relevant part), as far as reasonably practicable. It is a disruptive and fully intrusive survey, which may need to penetrate all parts of the building structure.

Aggressive inspection techniques will be used to lift carpets and tiles, break through walls, ceilings, cladding and partitions, and open up floors. In these situations, controls must be put in place to prevent the spread of any debris which may contain asbestos.

GPD carries out R&D surveys when refurbishment work or demolition is planned. This will include any works which are deemed to be intrusive including works to void properties.

Where a leaseholder or tenant applies for Landlord's Consent for Alterations, the resident will be responsible for arranging for a R&D survey to be carried out by a UKAS accredited company prior to consent being granted by the Property Compliance Team.

5.2.3 Management survey with refurbishment elements

This 'combined' survey type is carried out when intrusive works are planned to isolated areas, for example, a kitchen replacement. In these instances, an R&D survey will be undertaken to the works area with a management level survey carried out to the rest of the dwelling.

This type of survey allows information to be gathered on all areas of a dwelling when access is gained to increase the overall asbestos information held on the stock.

5.2.4 Bulk Samples

A bulk sample refers to a sample of a single material not undertaken as part of a survey. This may be as a result of a material being damaged or a suspect material being identified in an area where a survey has already been completed.

5.2.5 Reinspection Surveys

Reinspection surveys are undertaken to inspect previously identified or presumed asbestos materials to ensure that their condition remains the same and they have not deteriorated or been damaged.

5.3 Survey Strategy - Non-Domestic Premises (Communal Areas)

| Survey Type | Strategy |
|--|---|
| Management Surveys | To be carried out to all non-domestic premises constructed pre-2000 where LBHF is the duty holder. This includes the communal areas of block of flats as well as community rooms, offices and tenant halls. |
| R&D Surveys | To be carried out prior to any intrusive works including projects where full building subject to works. |
| Management survey with refurbishment elements | To be carried out prior to any intrusive works including projects and intrusive repairs where only specific areas of the building being subject to work. |
| Bulk Samples | To be carried out where a material has been identified as suspect and a survey has already been carried out or in the event of an emergency. |
| Reinspection Surveys | To be carried out every 12 months. |

5.4 Survey Strategy – Domestic Properties (Dwellings)

| Survey Type | Strategy |
|--|--|
| Management Surveys | To be carried out if survey required but no intrusive works planned e.g. at resident request. In order to build up the overall asbestos data on the stock, from time to time programmes of management surveys may be undertaken to dwellings. |
| R&D Surveys | To be carried out prior to any intrusive works including project, voids, aids and adaptations and intrusive repairs where whole dwelling subject to works. Also to be carried out prior to work requested by resident requesting Landlord's Consent for Alterations (at resident's expense). |
| Management survey with refurbishment elements | To be carried out prior to any intrusive works including project, voids, aids and adaptations and intrusive repairs where only specific areas of the dwelling subject to works. |
| Bulk Samples | To be carried out where a material has been identified as suspect and a survey has already been carried out or in the event of an emergency. |
| Reinspection Surveys | To be carried out at request of resident (i.e. if change in condition of material reported) or to validate past records. No routine reinspections of asbestos materials in dwellings will be undertaken. |

5.5 Scope of Duty to Manage

In line with HSE guidance, LBHF RPHS has applied the Duty to Manage to property types as per the table below;

| Type of residence | Type of occupation | Rooms or parts | Duty to manage applies? |
|---|---|---|-------------------------|
| Private house – single dwelling including bedsits | Owner occupier | All | No |
| | Let to single family | All | No |
| | Occupied by more than one family | Private rooms, e.g. bedroom, living room | No |
| | | Shared rooms, e.g. kitchen, bathroom, lavatory | No |
| | Rooms let to lodgers | Common parts for access and circulation, e.g. entrance hall, staircase | No |
| | | Private rooms | No |
| House converted into flats | Occupied by more than one family | Private rooms | No |
| | | Common parts for access, circulation and storage, e.g. entrance hall, staircase, roof space | Yes |
| Garages, parking spaces | Integral to, or linked with residence | Private | No |
| | Not allocated to any specific person | Common parts – for access and circulation | Yes |
| Block of flats | Occupied by more than one family | Individual flats | No |
| | | Common parts, e.g. foyer, lift, stairs, lobby, boiler and plant room, roof space, communal yard, garden, store rooms, bike shelter, external outbuilding | Yes |
| Flats over a shop or office, with or without a separate entrance | Occupied by the shop or office owner | Private rooms | No |
| | Leased separately | Private rooms | No |
| | | Access and circulation areas | Yes |
| Sheltered accommodation | | Private rooms | No |
| | | Common rooms, e.g. dining room, lounge | No |
| | | Work areas, e.g. kitchen, staff room, laundry | Yes |
| | | Common parts, e.g. foyer, lift, stairs, circulation areas, boiler room, store rooms, roof space, external outbuilding | Yes |

5.6 Survey information for New Stock/Stock Transfer

GPD will provide information on the presence of asbestos to prospective purchasers as required and where available. This will be in the form of asbestos surveys and removal records.

When acquiring new stock built before 2000, GPD will request all asbestos information to allow this to be reviewed for adequacy by the Asbestos Manager prior to the purchase/handover. Previous survey information will be added to the register and additional surveys instructed via ACE if required.

Any new developments will be clearly identified as post 2000 on the register to demonstrate that these are asbestos free.

5.7 Audits of Asbestos Surveys

In order to ensure that asbestos surveys are being carried out in line with legislation and this Plan, GPD will undertake audits on completed surveys. These will be carried out by the Asbestos Manager or independent consultants and will be based upon the requirements of UKAS RG 8 - Accreditation of Bodies Surveying for Asbestos in Premises Edition 4.

6. RISK ASSESSMENT AND MANAGEMENT ACTIONS

OVERVIEW – Regulation 4 of CAR 2012 requires Dutyholders to assess the risk of anyone being exposed to asbestos materials and prepare a written plan to manage that risk. Additionally, Dutyholders must ensure that any material known or presumed to contain asbestos is kept in a good state of repair and adequately protected or, if it is in a vulnerable position and cannot be adequately repaired or protected, it is removed.

This section outlines how material and priority assessments of asbestos materials will be used and how overall risk scores will be assigned. It also details the rationale for undertaking remediation work and the action plan for managing asbestos risk.

6.1 Risk assessment of Asbestos

All identified asbestos materials are allocated a risk score, which is defined by adding a score given based on the material (the material score) and with a score based on the risk of disturbance (the priority score). The combined material and priority assessment results are used to establish the priority for those ACMs needing remedial action and the type of action that will be taken.

The material assessment, priority assessment and combined risk score for each incidence of asbestos are recorded in the asbestos register.

6.2 Material assessment

The asbestos surveyor will provide a material risk assessment for each incidence of asbestos based on scoring the following parameters on an (increasing potential risk) scale of 1 -3 and then adding together these scores;

- product type;
- extent of damage or deterioration;
- surface treatment; and
- asbestos type.

The potential for a material to release fibres is classified as;

| | Material Score | Potential to release fibres if disturbed |
|-------|----------------|--|
| | 4 or less | Very Low |
| 5 - 6 | | Low |
| 7 - 9 | | Medium |
| | 10 -12 | High |

Non-asbestos materials are not scored.

The material assessment algorithm is contained in Appendix 1.

6.3 Priority Assessment

An additional assessment is carried out to determine the risk of the material being disturbed based on the following factors;

- the location of the material;

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

Each priority assessment parameter is also given a score between 0-3 and these are added together;

| Priority Score | Disturbance Potential |
|----------------|-----------------------|
| 4 or less | Very Low |
| 5 - 6 | Low |
| 7 - 9 | Medium |
| 10 -12 | High |

Although guidance does not require Priority Assessments to be undertaken for R&D surveys as it is assumed that asbestos identified will be removed, GPD request that surveyors provide Priority Assessments for all survey types. This ensures that full risk data is obtained for all asbestos materials and allows for asbestos identified in an R&D survey that is in good condition to be managed in situ.

GPD have agreed Priority Assessment criteria for their stock with ACE to allow the surveyors to undertake this assessment on the Council’s behalf. This approach would also apply to any other asbestos consultant employed by GPD.

The priority assessment algorithm is contained in Appendix 2.

6.4 Risk Categories

Risk categories are calculated from the total of the combined material and priority scores.

| Risk Band | Combined Material and Priority Score |
|-----------|--------------------------------------|
| Very Low | 1-7 |
| Low | 8-11 |
| Medium | 12–15 |
| High | 16-24 |

6.5 Reassessment of Risk

The risk score of an incidence of asbestos will be reviewed and updated following;

- Removal of the item - where the risk score will be reduced to 0
- Remediation work – e.g. encapsulation - where the material assessment score will be reduced
- Change of use of the area – e.g. increase in number of occupants – where the priority assessment will be amended
- Change in condition of the material – e.g. deterioration – where the material assessment will be amended

The Asbestos Manager is responsible for ensuring that the risk scores in the register are amended based on the above.

6.6 Actions to be taken by GPD

Asbestos containing materials that are in good condition pose no risk to health and can be managed in situ. Management actions to be taken by GPD will be based on one or a combination of the following;

- The risk score of the item
- The asbestos surveyor's recommendation for action
- Works to be undertaken in the area
- Strategy for overall risk reduction

6.6.1 Asbestos with High Risk Scores

GPD will ensure that any asbestos identified as posing a risk to health is addressed. Any asbestos with an overall risk score of 16 or above will either be removed or encapsulated to reduce its score to below this threshold.

The Asbestos Manager is responsible for reviewing the risk rating of all ACMs and agreeing actions to be taken to reduce intolerable risk by arranging for remedial or removal work.

6.6.2 Asbestos with Identified Actions

Where the asbestos surveyors recommend remedial action (either decontaminate, remove or repair/encapsulation) these will be appropriately actioned.

The Asbestos Manager is responsible for reviewing the recommended actions arising from surveys and arranging for remedial or removal work.

6.6.3 Asbestos which may impact upon works

If works are to be carried out (either voids, project-related or day to day repairs) that will be impacted by asbestos or that may involve disturbing asbestos materials then the asbestos material will be removed. The person responsible for organising the works must assess the requirement for asbestos removal and instruct this accordingly.

If asbestos removal is required for work undertaken by a leaseholder or tenant that requires Landlord's Consent for Alterations, this will be arranged and paid for by the resident who must supply adequate documentation on completion.

If asbestos is identified that may reasonably impact on future routine maintenance or cyclical servicing or could cause issues in the event of plant or machinery requiring emergency isolation, the asbestos material will be removed.

6.6.4 Overall Risk Reduction

The Asbestos Manager will also manage an ongoing programme of removal work in order to reduce the overall risk of asbestos across the stock. This will be based on risk scores or linked to specific programmes of planned work.

Following the introduction of the proposed new asbestos register, it is also intended that a programme be drawn up to remove any single items of asbestos present in communal areas where these are simple to remove. The objective of this programme will be to reduce the need for ongoing reinspection of these items and consequently reduce reinspection cost.

6.7 Table of Management Actions

The following table details the proposed management actions for identified asbestos. This table should be used as a guide and each incidence will be assessed individually by a competent person – either the Asbestos Manager or person instructing works.

| | Management Actions | | | Notes |
|---|--------------------|------------|--------|---|
| | Remove | Remediate* | Manage | |
| Asbestos with combined risk score over 16 | ✓ | ✓ | | Material to be removed or remedial action taken to reduce the risk score to below 16 |
| Asbestos with ‘decontaminate’ action | ✓ | | | |
| Asbestos with ‘remove’ recommendation | ✓ | | | Some historic R&D surveys have recorded ‘remove’ as default action but this has now changed so ‘remove’ is only recommended based on the risk of the material |
| Asbestos with ‘encapsulate’ recommendation | | ✓ | | |
| Asbestos which will be affected by or will affect proposed works | ✓ | | | |
| Asbestos which may impact upon future servicing, maintenance or emergency isolation (e.g. to plant) | ✓ | | | |
| Easily removed items of asbestos in communal areas which are the only asbestos item present | ✓ | | | To reduce ongoing reinspection costs these items will be removed. To be programmed once data available in Geometra register. |
| Asbestos in good condition which does not impact upon works | | | ✓ | |

* NB remediate includes encapsulation, repair or protection of a material

7. RECORDS, INFORMATION AND COMMUNICATION

OVERVIEW – Regulation 4 of CAR 2012 requires Dutyholders to make a written record of the location and condition of asbestos and/or presumed ACMs and ensure that the record is kept up to date. Additionally, Dutyholders must ensure that information on the location and condition of the material is given to anyone who is liable to disturb it or is otherwise potentially at risk.

This section outlines how the location and condition of any known or presumed asbestos is recorded in a register. It also details the mechanism for passing information about the location and condition of asbestos to those who need it, including how information is provided to residents.

7.1 Asbestos Register

7.1.1 Proposed Asbestos Register

GPD is currently in the process of developing a bespoke asbestos register in Geometra which is due for completion in Summer 2018.

Historically, information on asbestos (surveys and removal records) has been held in a number of locations and the introduction of the Geometra database will ensure that there is a single location where all documentation is stored in a consistent and accessible way.

It is intended that the Geometra database will contain;

- General property details
- Survey date, type and surveyor details
- Details of asbestos containing product, location and asbestos type
- Material assessment scores
- Priority assessment scores
- Overall risk score
- Recommended actions
- Due date for actions (including reinspection)
- Accompanying documentation – asbestos surveys and removal records

7.1.2 Interim (Current) Asbestos Register

In the interim, all asbestos survey information is stored on the ACE Teams portal which is accessible via a unique log in. The ACE Teams portal contains all surveys undertaken since 2014 to both domestic and non-domestic areas. ACE upload all new asbestos surveys directly to the portal.

The ACE Teams portal does not record completed asbestos removal or remediation work and therefore provides a 'worst case' of asbestos risk at a property. Records of asbestos removal work have historically been held on Mitie's systems and a data reconciliation exercise is being undertaken to obtain all past records to allow this data to be recorded in Geometra.

7.2 Updating records following identification of Asbestos

New asbestos survey reports are saved directly to the ACE Teams portal.

The new Geometra register will be updated when new survey data is received. Electronic copies of asbestos survey reports will also be held within the register against the individual property.

7.3 Updating records following removal of Asbestos

As part of the move to the new Geometra register, a process is being put into place to allow the updating of the register following removal work.

7.4 Access to Asbestos Information – GPD Staff

Log in credentials have been provided to all GPD staff who require access to the asbestos data. It is the responsibility of team leaders to alert the Asbestos Manager to changes in personnel so that access can be removed or added. Access to the portal is fully trackable and auditable and is monitored on a monthly basis by the Asbestos Manager.

The access points for each workstream are detailed in the process charts in section 10 of this plan.

7.5 Access to Asbestos Information – Mitie

Log in credentials have been provided to all Mitie staff who require access to the asbestos data. There is currently no facility for operatives to access asbestos information from site (using PDAs or tablets) although this is intended to be introduced with the new Geometra register.

It is the responsibility of team leaders to alert the Asbestos Manager to changes in personnel so that access can be removed or added. Access to the portal is fully trackable and auditable and is monitored on a monthly basis by the Asbestos Manager.

The access points for each workstream are detailed in the process charts in section 10 of this plan.

7.6 Access to Asbestos Information – Contractors outside Mitie TPC Contract

Log in credentials will be provided to all other contractors' staff who require access to the asbestos data. GPD staff engaging other contractors should consult with the Asbestos Manager and agree the appropriate arrangements, which will be expected to be the same as Section 7.5.

7.7 Information to Tenants

Asbestos survey information is provided to new tenants as part of their tenancy pack. It is intended that the new Geometra database will allow bespoke reports to be produced to provide to tenants upon reasonable request.

GPD do not by default issue dwelling asbestos surveys to existing residents, unless specifically requested or as part of a new tenancy agreement. If requested, residents will be provided with information. A template letter for providing asbestos information is included in appendix 5.

If no asbestos information is available on a tenant's home constructed prior to 2000 then LBHF RPHS will arrange for a survey to be undertaken.

The process for providing asbestos information to tenants is detailed in process 6.

Before undertaking any alterations or DIY in our properties, residents are required to inform GPD so an assessment can be made of asbestos risk. These works should not be authorised until the asbestos register has been checked and it demonstrates no asbestos in the work area.

Tenants are required under their tenancy agreement to report any damage to known or suspected asbestos. In the event of damage being reported, the Asbestos Manager will determine the most appropriate course of action which may be removal or a survey or reinspection.

7.8 Information to Leaseholders

Leaseholders are responsible for undertaking asbestos surveys in their homes. Information on asbestos in common parts of leasehold properties is provided on reasonable request. The process for issuing asbestos information in assignment packs is detailed in Process 7.

7.9 Labelling of Asbestos

It is LBHF policy not to label asbestos containing materials in domestic premises or non-domestic premises. This decision has been taken because labels are often obscured, painted over or removed and that the absence of a label can give false reassurance that a material is asbestos-free.

8. ASBESTOS REMOVAL AND REMEDIATION WORKS

OVERVIEW –Regulation 6 of CAR 2012 requires employers to carry out a risk assessment to identify the risks of exposure to asbestos. It sets out the requirement to record any significant findings and put in place steps to prevent, or reduce, exposure to employees. Regulation 7 requires employers to prepare a written plan before work on asbestos is carried out, including details of the work, and the appropriate actions to control risk and prevent harm. Regulation 8 requires contractors to hold a licence for undertaking certain works with asbestos.

This section outlines how asbestos removal works will be arranged and managed.

8.1 Asbestos Removal Contractor

All work with asbestos on GPD stock will be carried out by a Licensed Asbestos Removal Contractor (LARC).

In order to be granted a licence, contractors are required to demonstrate that they have the necessary skills, competency, expertise, knowledge and experience of work with asbestos, together with excellent health and safety management systems.

A licence acts as a 'permit to work' with asbestos following a successful licence assessment interview. Holding a licence incurs serious responsibilities, particularly at a senior management level. Applying for a licence to work with asbestos (or renewing a licence) requires:

- thorough preparation
- a commitment to continuous improvement
- the demonstration of organisational and individual competence
- an extensive knowledge of the industry
- a willingness to be accountable for the company's performance
- the provision of evidence of effective health and safety management systems

Licences are issued for a fixed period of time, after which they need to be renewed. At renewal, performance as recorded following inspections by HSE inspectors and local authority officers will also be taken into account.

Asbestos removal for GPD is covered by the term partnering contract with Mitie. Mitie sub contracts this work to Alltask Limited who hold a full licence.

The Asbestos Manager is responsible for ensuring that licensed removal contractors appointed via Mitie have the appropriate training and qualifications as well as the necessary accreditations and insurances.

8.2 Undertaking Asbestos Removal Work

The Asbestos Manager is responsible for ensuring that;

- All work on asbestos containing materials is to be carried out in accordance with the Control of Asbestos Regulations 2012, associated approved codes of practice and guidance
- All work on asbestos containing material is to be carried out by a licensed asbestos removal contractor (LARC)
- If required, for licenced and notifiable non-licenced work (NNLW), the LARC gives notice to the HSE

- That a plan of work is prepared
- That the work is carried out in accordance with the procedures described in the plan of work and method statement
- That any air testing required is carried out by an independent UKAS accredited analyst
- That the licensed contractor provides verification of the clearance certificates once the works have been completed

The same requirements apply for encapsulation of ACMs.

8.3 Plans of Work

For any work involving asbestos including removal and encapsulation a written plan of work must be prepared by the contractor detailing how the work will be carried out.

The plan of work must include the following information:

- 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, e.g. prevention and control measures, arrangements for keeping premises and plant clean and arrangements for the handling and disposal of asbestos waste;
- the type of equipment, including PPE and RPE, used for protecting and decontaminating those carrying out the work and protecting other people present at or near the worksite.

Where necessary, the plan should include the site layout, a description of the location and nature of the asbestos present and which ACMs will be disturbed by the work. More detail is likely to be required for complex or removal work.

It is the responsibility of the Asbestos Manager to ensure that a suitable and sufficient plan of work is in place prior to any works with asbestos.

8.4 Air Testing

All air testing (reassurance and 4 stage clearance) shall be carried out by an independent UKAS accredited analyst.

ACE are currently employed to undertake all air testing for LBHF RPHS.

8.5 Audits of Removal Works

In order to ensure that removal work is being carried out in line with legislation and this plan, GPD will undertake spot checks on removal projects. These will be carried out by the Asbestos Manager or independent consultants and will be fully documented.

Any reports of poor work on projects will be subject to a full review from the Asbestos Manager.

Licensed contractors are regularly audited by external bodies to ensure they are complying with the legislation, they have agreed that this information can be shared with LBHF if required.

All documents and procedures submitted by the contractors will be subject to a full review on a yearly basis to ensure they are still in date and relevant to the works they are undertaking

8.6 Records of Asbestos Removal

The following records will be held on all asbestos removal work carried out;

- Plans of work
- Method Statements
- ASB5 HSE notification forms
- Air monitoring reports and Air clearance certificates
- Waste Transfer Notes (Consignment notes)

8.7 When Asbestos will be Removed

HSE guidance states that if asbestos is in good condition and not disturbed it poses no risk to health and therefore asbestos removal will not be undertaken unless required. The circumstances under which LBHF will instruct asbestos to be removed are;

- Where asbestos may impact on works (either responsive, voids, or project) being safely carried out
- Where the asbestos has been identified as in poor condition, high risk or is vulnerable to damage
- Where a programme of removals is being undertaken to reduce the overall risk across LBHF RPHS stock
- Where the cost of managing the asbestos in situ (i.e. undertaking reinspections etc.) is disproportionate to the cost of removal

8.8 Asbestos Removal for Alterations Carried out by Leaseholders and Tenants

If asbestos removal is required for work undertaken by a leaseholder or tenant that requires Landlord's Consent for Alterations, this will be arranged and paid for by the resident who must supply adequate documentation on completion to the Property Compliance Team.

9. EMERGENCY PROCEDURES

OVERVIEW – Regulation 15 of CAR 2012 requires Employers to prepare procedures on what to do if there is an accidental, unplanned, uncontrolled release of asbestos fibres.

This section outlines how emergencies relating to asbestos will be managed and recorded.

9.1 Identification/Disturbance of Suspect Material

The process to be followed following the identification or disturbance of a material which may contain asbestos is detailed in Process 10.

This process details the need to determine whether the material is asbestos and to reduce or contain the spread of asbestos. In the event of an emergency, the Asbestos Manager will provide advice with the support of asbestos surveyors and consultants if required and ensure appropriate internal escalation.

9.2 Site process for Disturbance of Asbestos

The process to be followed on site following the disturbance of asbestos is detailed in Process 11. This includes the process for personal decontamination. In the event of a disturbance, the Asbestos Manager or asbestos surveyor will provide detailed advice based on the material disturbed and the level of risk.

9.3 Incident Reporting

All incidents relating to uncontrolled release of asbestos must be reported via the internal TRI Airs reporting system.

The Head of Health and Safety Compliance is responsible for determining whether an asbestos incident is RIDDOR reportable and if so, notifying the HSE.

The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR) places duties on employers, the self-employed and people in control of work premises (the responsible person) to report certain serious workplace accidents, occupational diseases and specified dangerous occurrences (near misses).

Exposure to asbestos is reportable under RIDDOR when a work activity causes the accidental release or escape of asbestos fibres into the air in a quantity sufficient to cause damage to the health of any person. This includes;

- use of power tools (to drill, cut etc) on most ACMs
- work that leads to physical disturbance (knocking, breaking) of an ACM that should only be handled by a licensed contractor e.g. sprayed coating, lagging, asbestos insulating board (AIB)
- manually cutting or drilling AIB
- work involving aggressive physical disturbance of asbestos cement e.g. breaking or smashing

9.4 Investigation following incidents

Any incident involving the uncontrolled release of asbestos will be subject to a full internal investigation. This will include a review of this asbestos management plan and working practices if found to be contributory.

Internal investigations will be led by the Head of Health and Safety Compliance.

9.5 Record Keeping Following Incidents

Records of any exposure or potential exposure to asbestos will be retained on the individuals personnel file. Due to the long latency period of asbestos related diseases, these records must be kept for 40 years or until the employee reaches the age of 80, whichever is the longer. These records should be kept even if the employee leaves GPD.

Any staff affected by exposure or potential exposure will receive a record of the incident report.

9.6 Health Surveillance and Support

If any GPD employees are exposed to asbestos fibres, then they must be referred to LBHF Human Resources to arrange health surveillance. Human Resources will arrange for ongoing health surveillance to be carried out for these individuals, as well as providing medical guidance and support, OH support and counselling will be provided as required.

10. PROCESSES AND SAFE SYSTEMS OF WORK

OVERVIEW – This section outlines the processes in place to ensure safe systems of work in relation to asbestos when works are to take place to LBHF RPHS properties. It also details the processes for providing information to residents and leaseholders and the processes to be followed in the event of an emergency involving asbestos.

10.1 Process 1: Safe Systems of Work - Day to day repairs

The process to be followed to assess the risk of asbestos when undertaking day to day repairs.

10.2 Process 2: Safe Systems of Work – Voids

The process to be followed to assess the risk of asbestos when undertaking void works.

10.3 Process 3: Safe Systems of Work - Capital works

The process to be followed to assess the risk of asbestos when undertaking capital or project work.

10.4 Process 4: Safe Systems of Work – Lifts

The process to be followed to assess the risk of asbestos when undertaking project work to lifts.

10.5 Process 5: Safe Systems of Work - Aids and adaptations

The process to be followed to assess the risk of asbestos when undertaking aids and adaptation works.

10.6 Process 6: Asbestos Process for Information to Tenants

The process to be followed to provide information on asbestos to tenants.

10.7 Process 7: Asbestos Process for Information to Leaseholders (assignment packs)

The process to be followed to provide information on asbestos to leaseholders.

10.8 Process 8: Asbestos Process for Alterations Carried out by Leaseholders and Tenants

The process to be followed to when Leaseholders or Tenants request consent for alterations.

10.9 Process 9: Asbestos Process for Unauthorised Alterations Carried out by Leaseholders and Tenants

The process to be followed to when unauthorised alterations are identified.

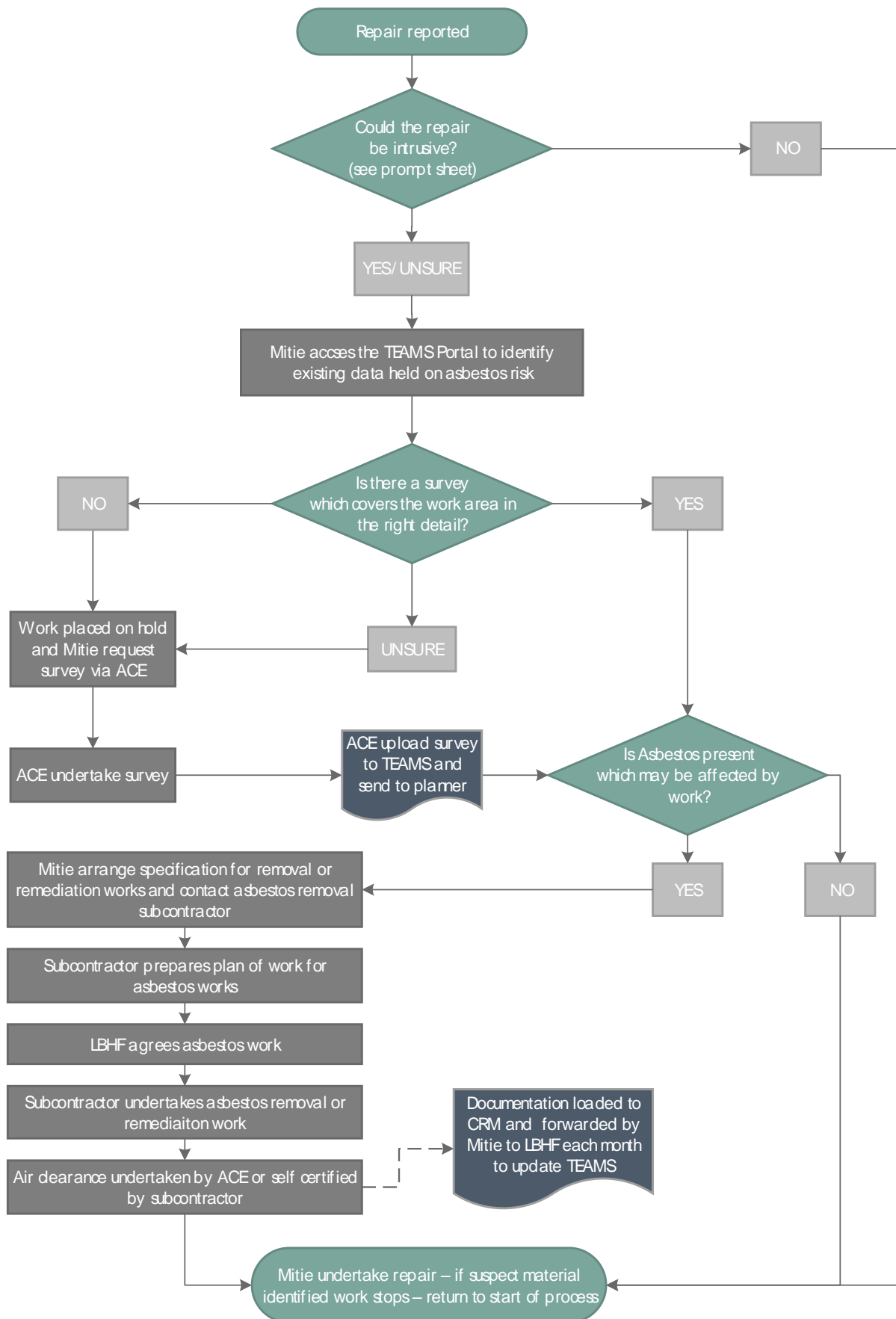
10.10 Process 10: Emergency Process for Disturbance of Suspect Material

The process to be followed to respond to the disturbance of a material which may or does contain asbestos.

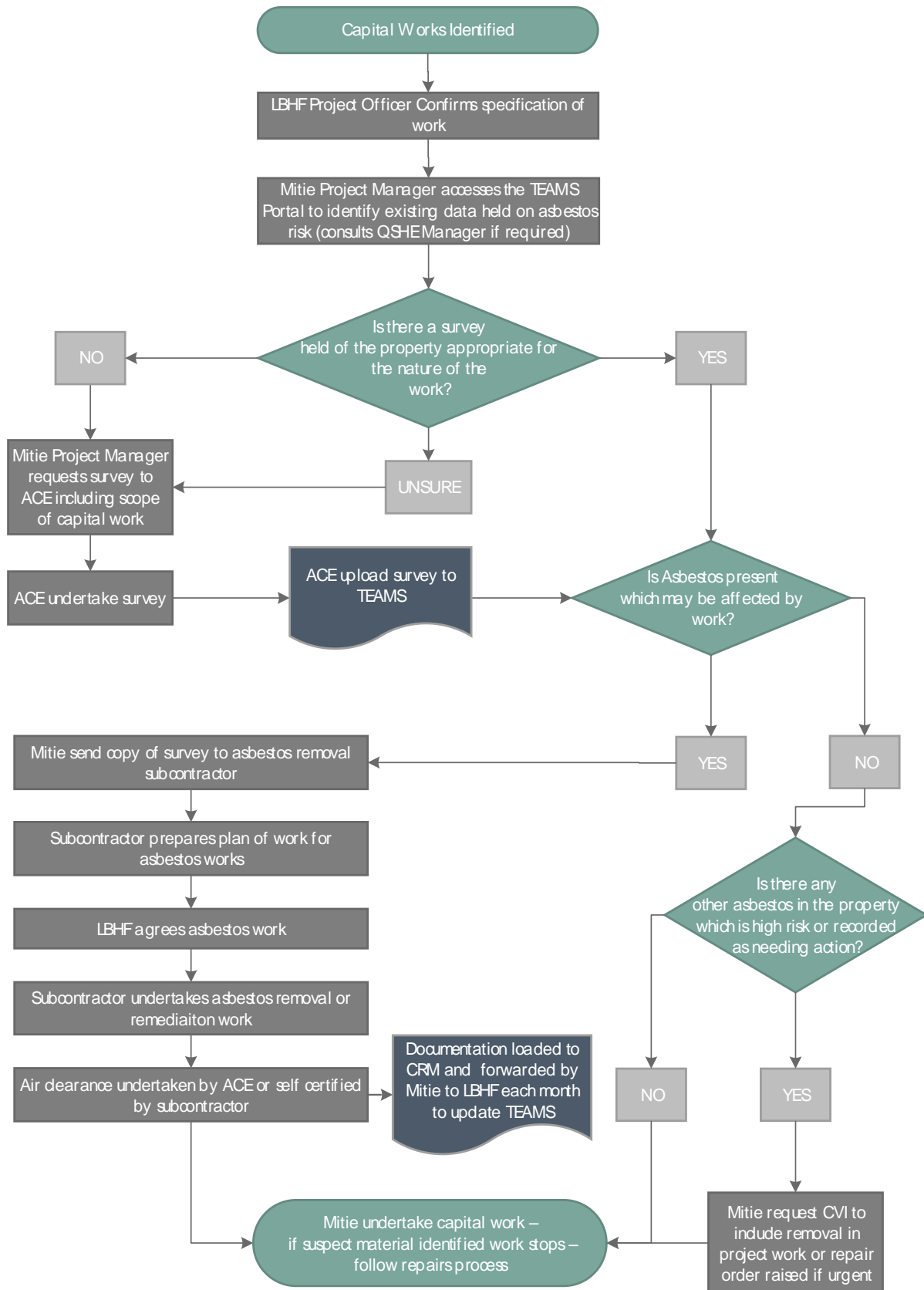
10.11 Process 11: Site Asbestos Emergency Process

The process to be followed on site following the disturbance or damage of a material which could contain asbestos.

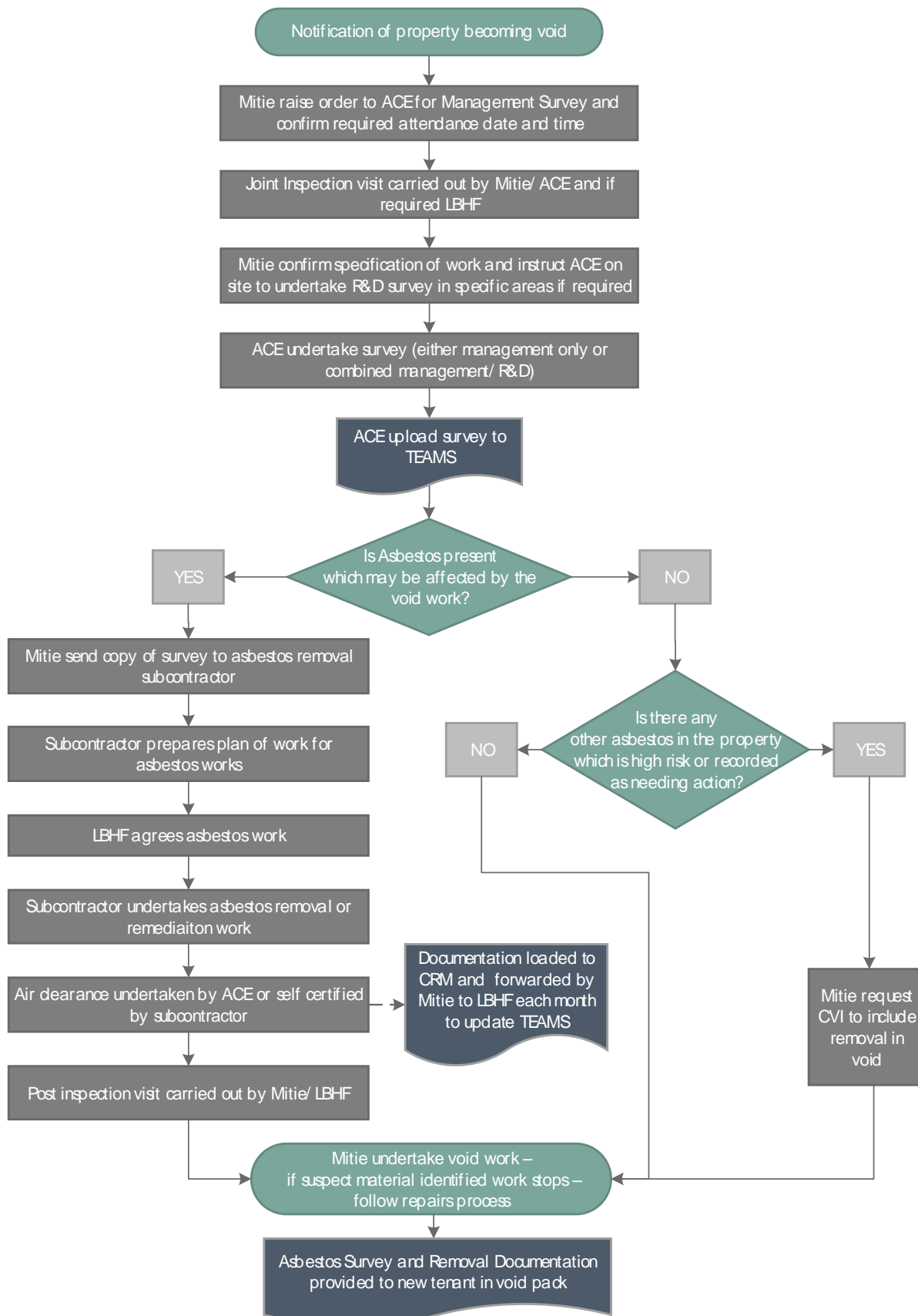
10.1 Process 1: Asbestos Process for Repairs



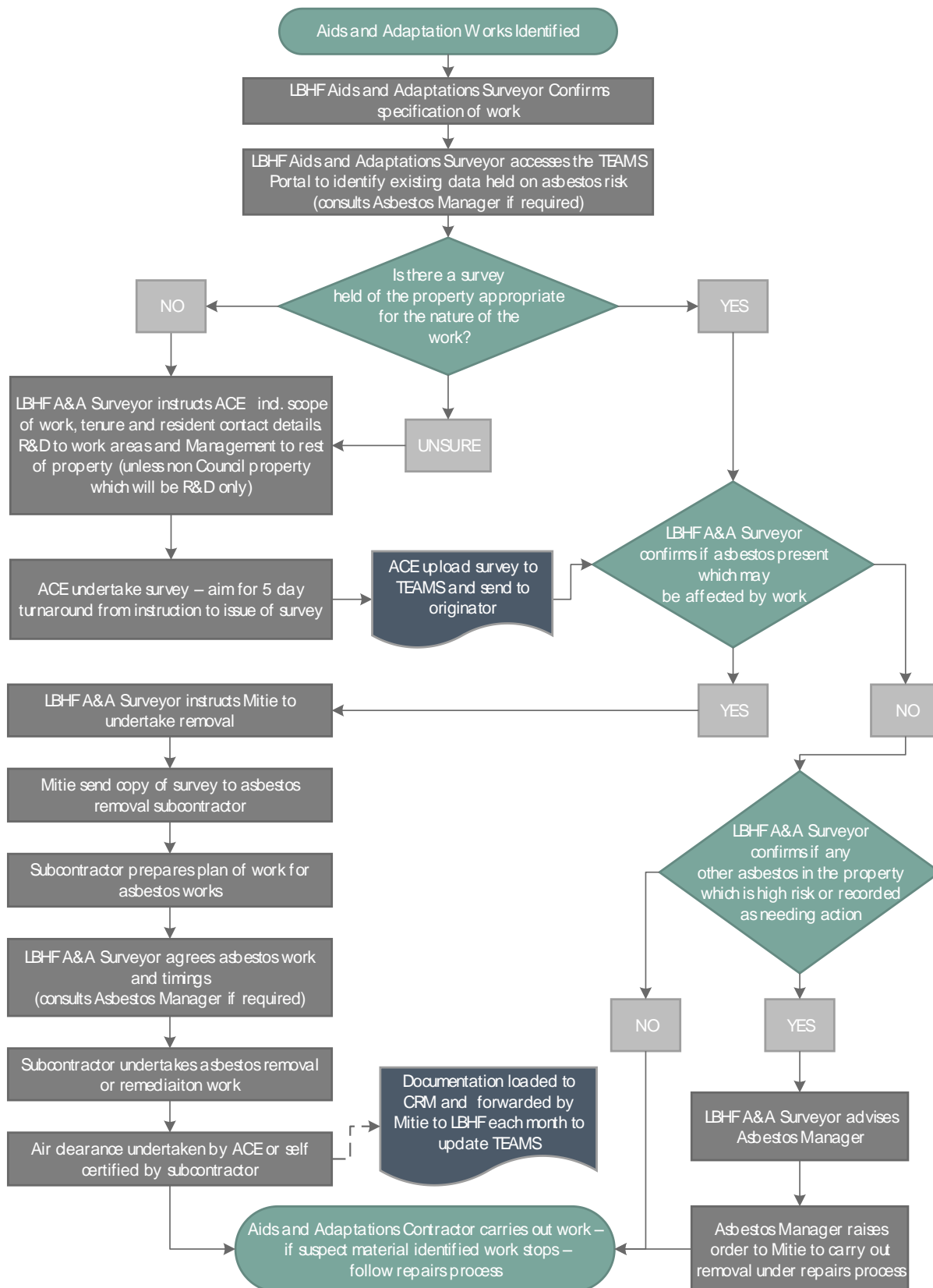
10.2 Process 2: Asbestos Process for Capital/Project Work



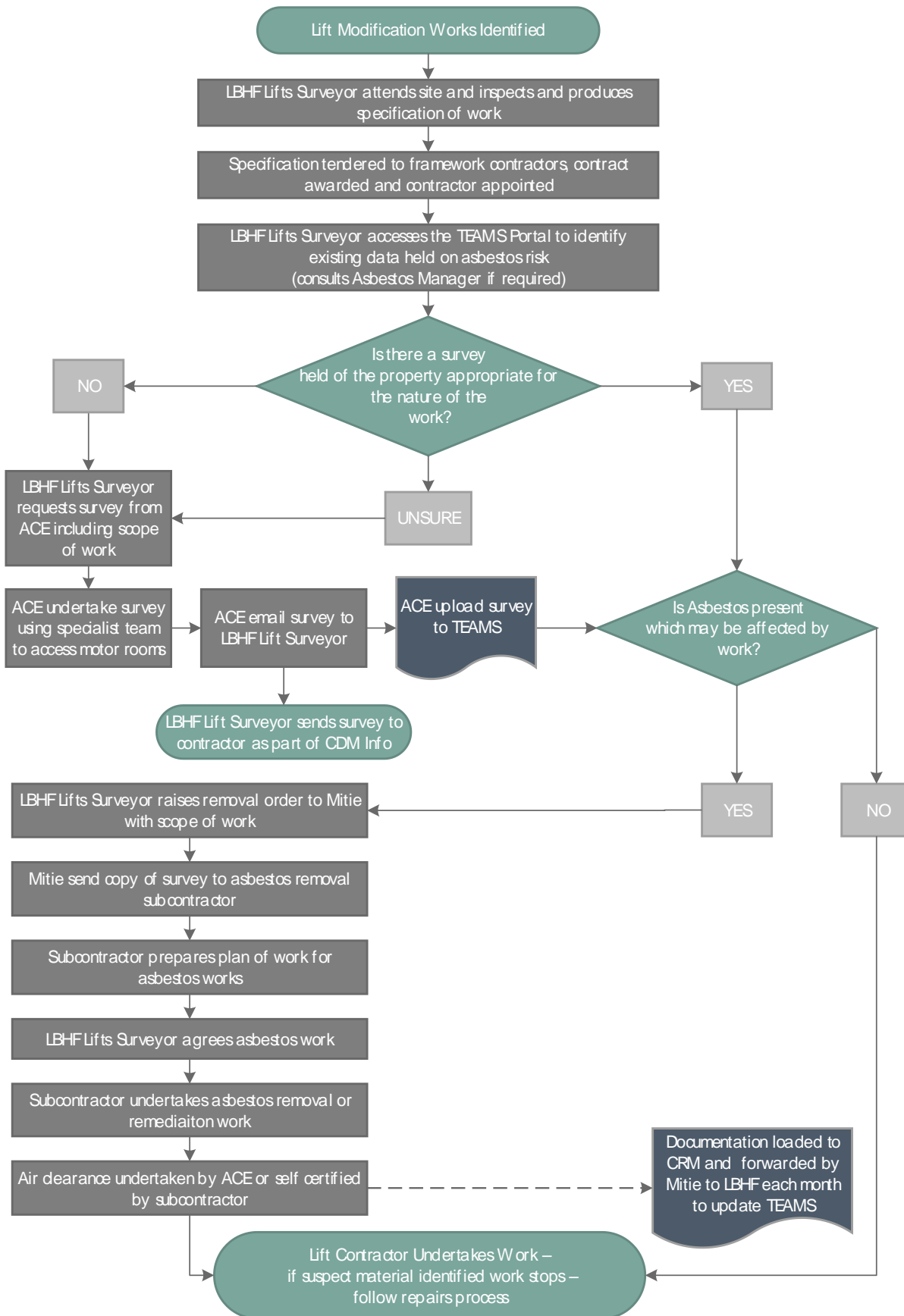
10.3 Process 3: Asbestos Process for Voids



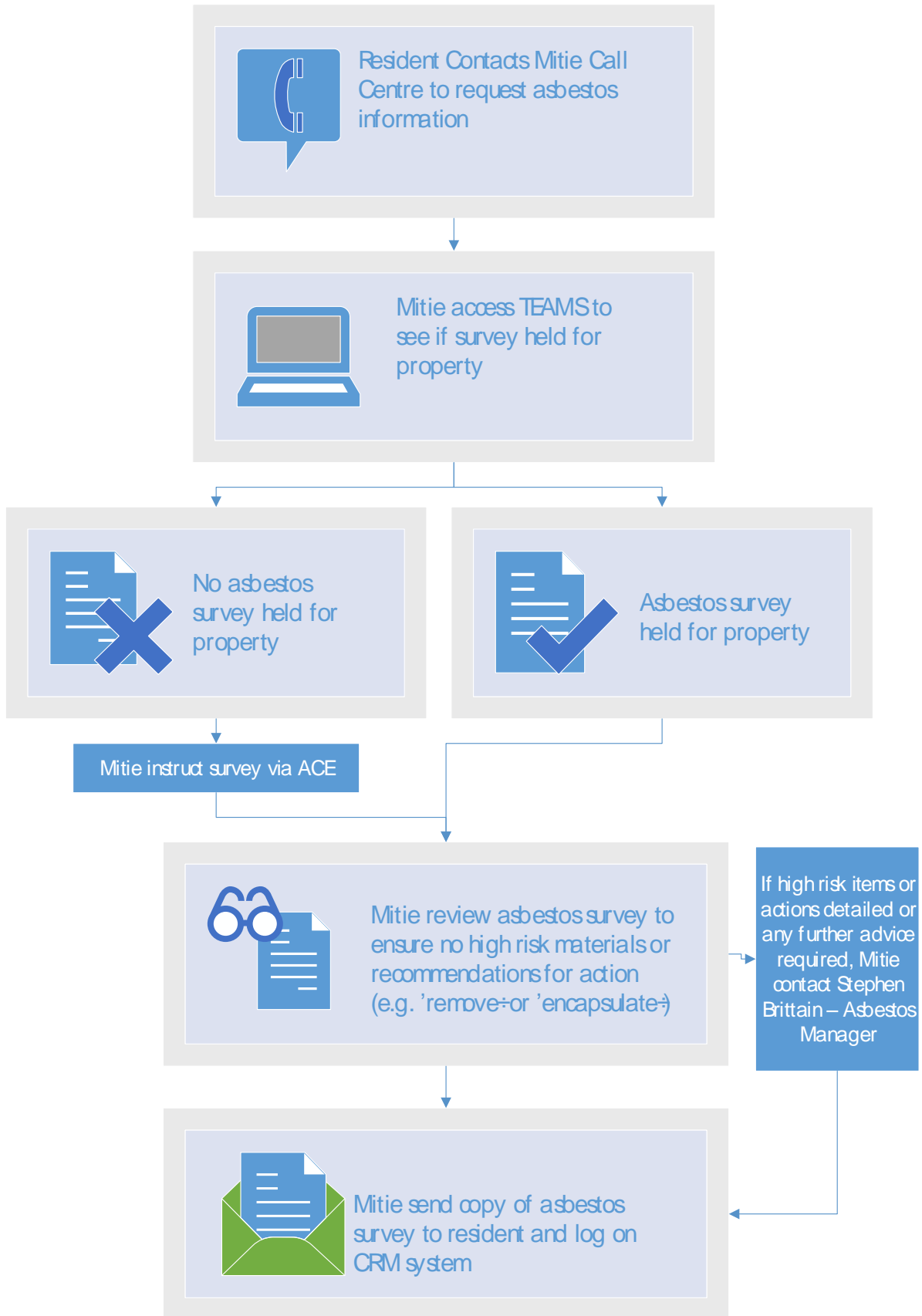
10.4 Process 4: Asbestos Process for Aids and Adaptation Work



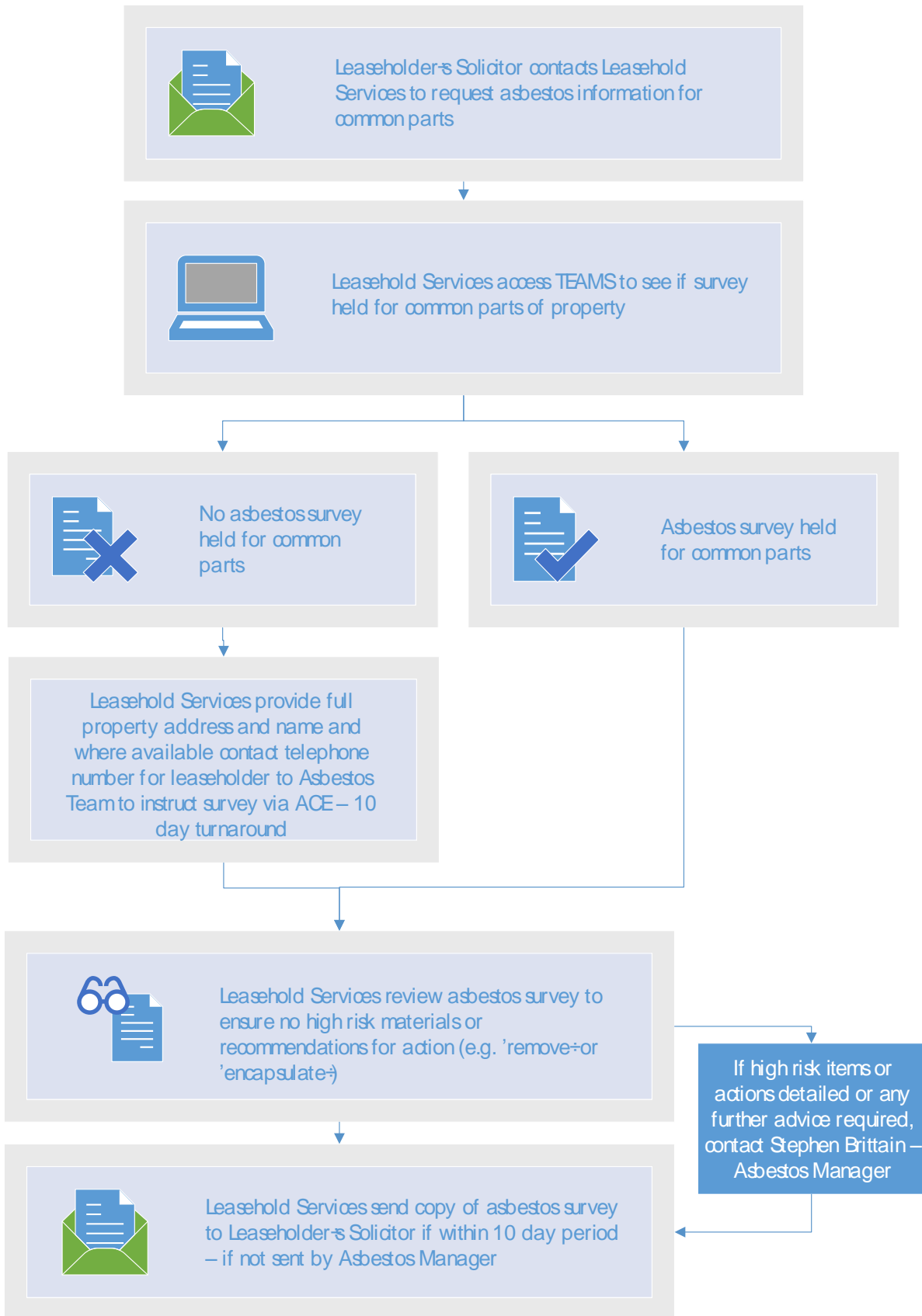
10.5 Process 5: Asbestos Process for Lift Work



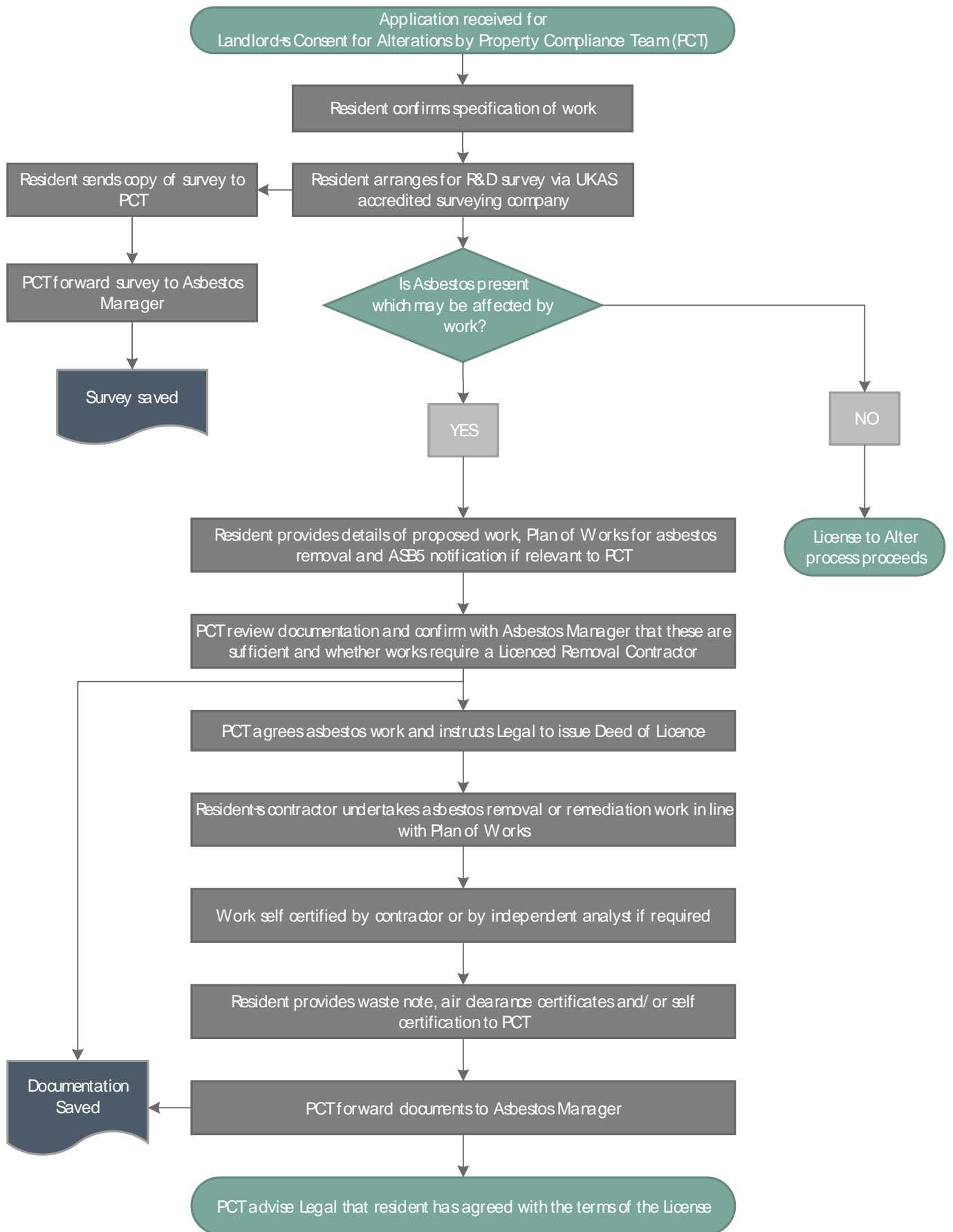
10.6 Process 6: Asbestos Process for Information to Tenants



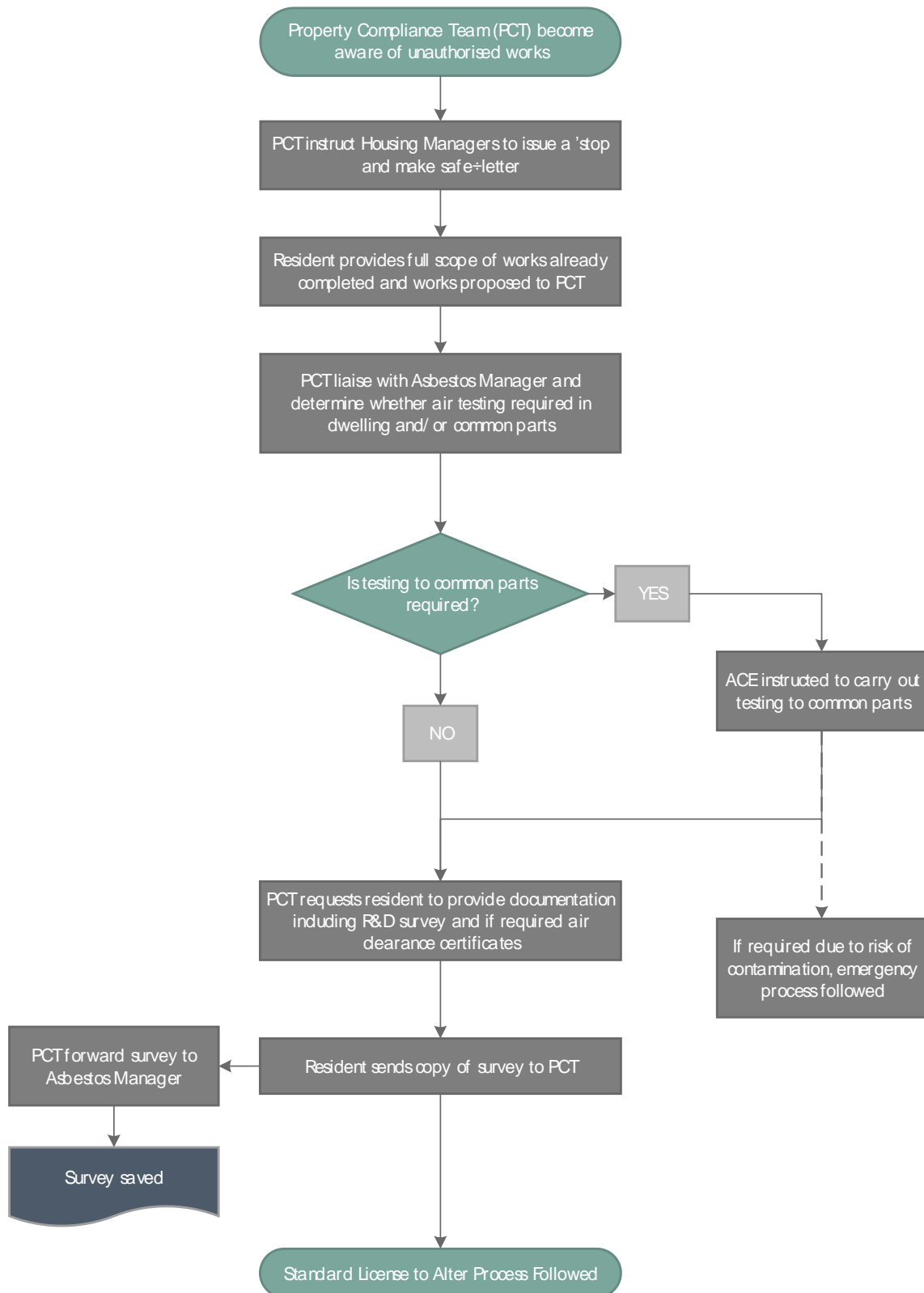
10.7 Process 7: Asbestos Process for Information to Leaseholders (assignment packs)



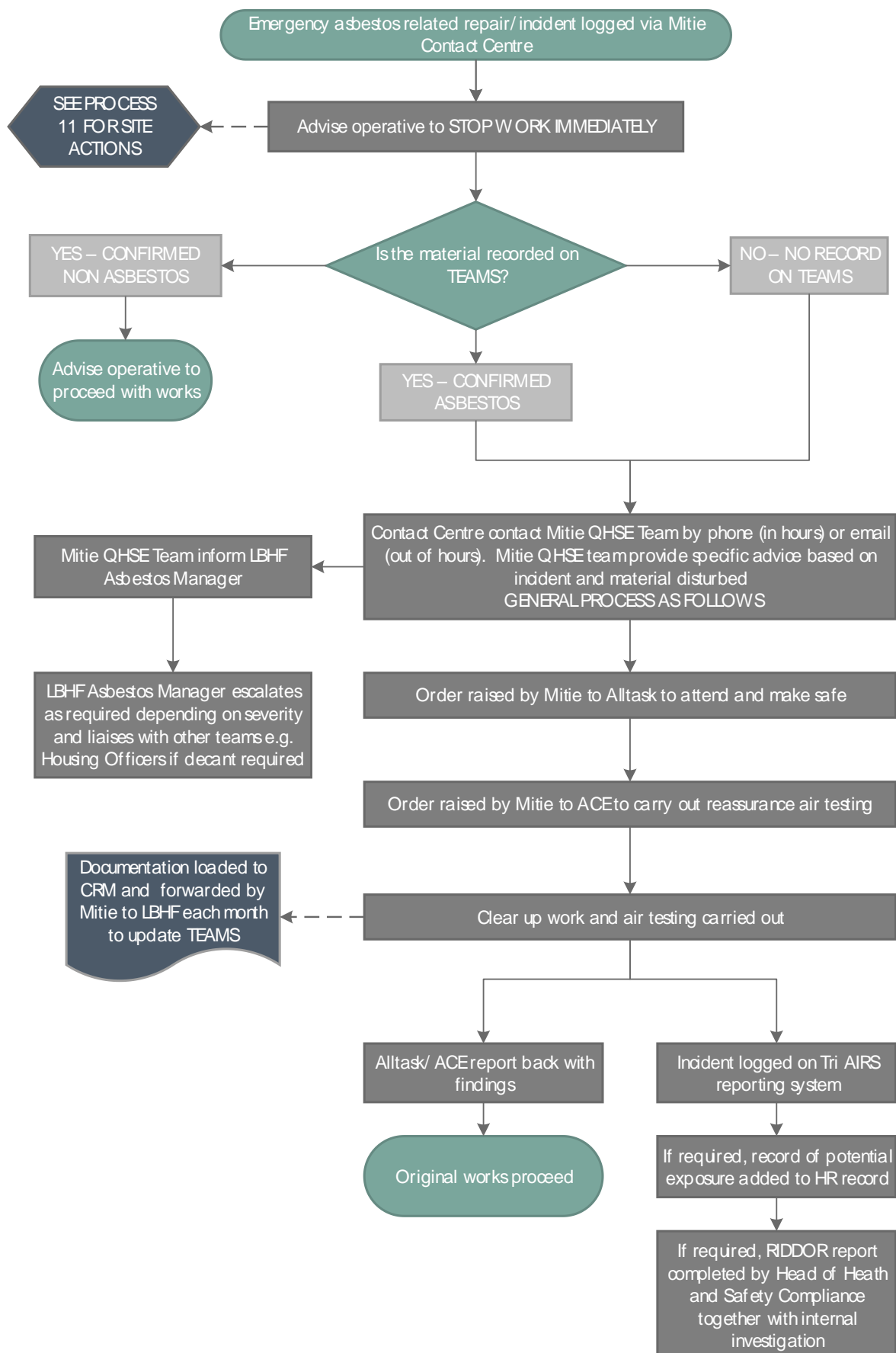
10.8 Process 8: Asbestos Process for Alterations Carried out by Leaseholders and Tenants



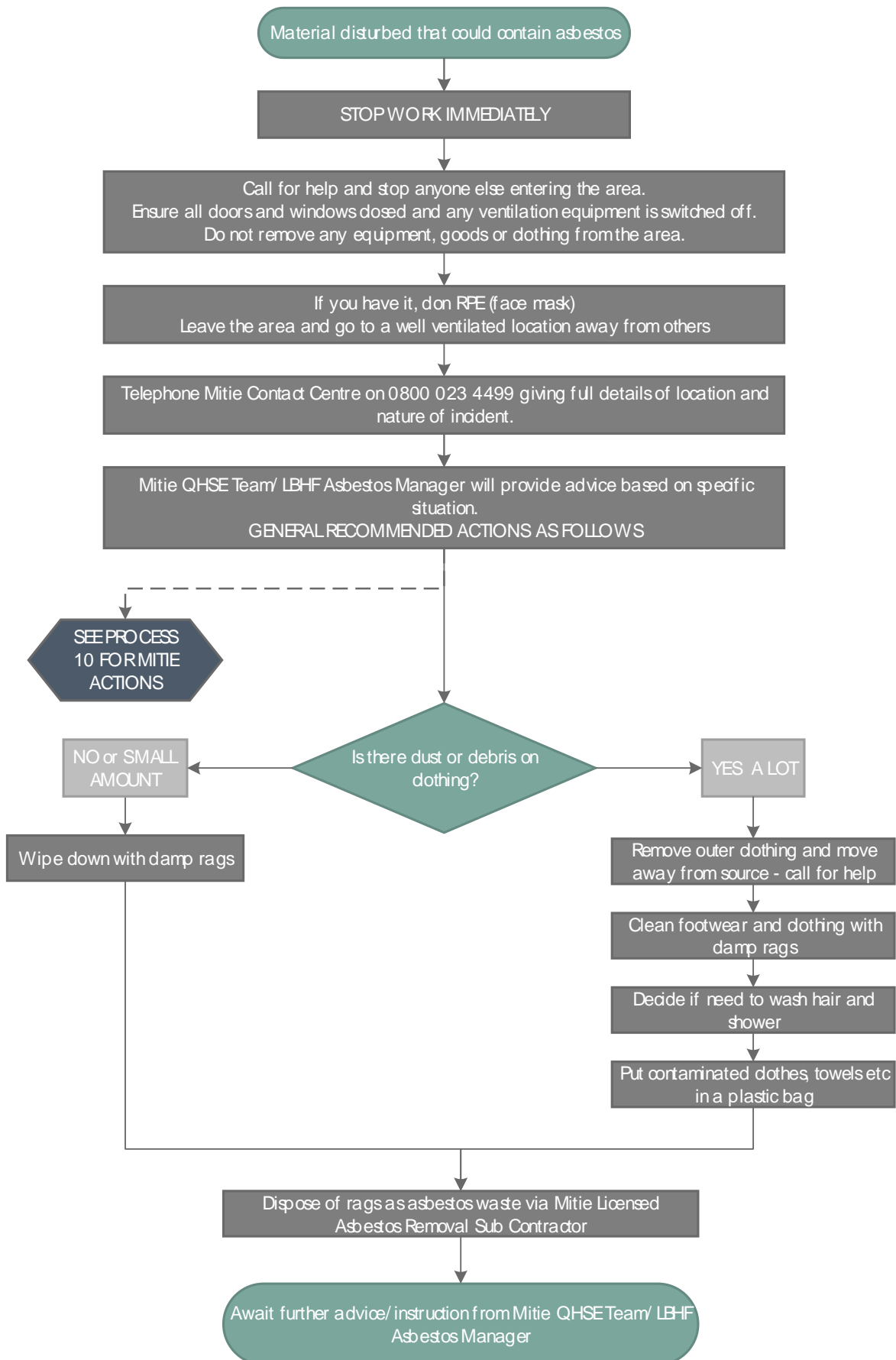
10.9 Process 9: Asbestos Process for Unauthorised Alterations Carried out by Leaseholders and Tenants



10.10 Process 10: Emergency Process for Disturbance of Suspect Material



10.11 Process 11: Site Asbestos Emergency Process



Appendix 1 - Material Assessment Algorithm

| Sample variable | Score | Examples of scores |
|--|-------|---|
| Product type (or debris from product) | 1 | Asbestos-reinforced composites (plastics, resins, mastics, roofing felts, vinyl floor tiles, semi-rigid paints or decorative finishes, asbestos cement etc.). |
| | 2 | AIB, millboards, other low-density insulation boards, asbestos textiles, gaskets, ropes and woven textiles, asbestos paper and felt. |
| | 3 | Thermal insulation (e.g. pipe and boiler lagging), sprayed asbestos, loose asbestos, asbestos mattresses and packing. |
| Extent of damage/deterioration | 0 | Good condition: no visible damage. |
| | 1 | Low damage: a few scratches or surface marks, broken edges on boards, tiles etc. |
| | 2 | Medium damage: significant breakage of materials or several small areas where material has been damaged revealing loose asbestos fibres. |
| | 3 | High damage or delamination of materials, sprays and thermal insulation. Visible asbestos debris. |
| Surface treatment | 0 | Composite materials containing asbestos: reinforced plastics, resins, vinyl tiles. |
| | 1 | Enclosed sprays and lagging, AIB (with exposed face painted or encapsulated) asbestos cement sheets etc. |
| | 2 | Unsealed AIB, or encapsulated lagging and sprays. |
| | 3 | Unsealed lagging and sprays. |
| Asbestos type | 1 | Chrysotile. |
| | 2 | Amphibole asbestos excluding crocidolite. |
| | 3 | Crocidolite. |

| Score | Potential to release asbestos fibres |
|------------|--------------------------------------|
| 10 or more | High |
| 7-9 | Medium |
| 5-6 | Low |
| 4 or less | Very low |

Non-asbestos materials have no potential to release asbestos fibres

Appendix 2 - Priority Assessment Algorithm

| Assessment factor | Score | Examples of score variables |
|---|-------|---|
| Normal occupant activity | | |
| Main type of activity in area | 0 | Rare disturbance activity (e.g. little used store room) |
| | 1 | Low disturbance activities (e.g. office type activity) |
| | 2 | Periodic disturbance (e.g. vehicular activity which may contact ACMs) |
| | 3 | High levels of disturbance, (e.g. fire door with AIB sheet in constant use) |
| Likelihood of disturbance (average score of 3 factors) | | |
| Location | 0 | Outdoors |
| | 1 | Large rooms or well-ventilated areas |
| | 2 | Rooms up to 100 m ² |
| | 3 | Confined spaces |
| Accessibility | 0 | Usually inaccessible or unlikely to be disturbed |
| | 1 | Occasionally likely to be disturbed |
| | 2 | Easily disturbed |
| | 3 | Routinely disturbed |
| Extent/amount | 0 | Small amounts or items (e.g. strings, gaskets) |
| | 1 | ≤10 m ² or ≤10 m pipe run. |
| | 2 | >10 m ² to ≤50 m ² or >10 m to ≤50 m pipe run |
| | 3 | >50 m ² or >50 m pipe run |
| Human exposure potential (average score of 3 factors) | | |
| Number of occupants | 0 | None |
| | 1 | 1 to 3 |
| | 2 | 4 to 10 |
| | 3 | >10 |
| Frequency of use of area | 0 | Infrequent |
| | 1 | Monthly |
| | 2 | Weekly |
| | 3 | Daily |
| Average time area is in use | 0 | <1 hour |
| | 1 | >1 to <3 hours |
| | 2 | >3 to <6 hours |
| | 3 | >6 hours |
| Maintenance activity (average score of 2 factors) | | |
| Type of maintenance activity | 0 | Minor disturbance (e.g. possibility of contact when gaining access) |
| | 1 | Low disturbance (e.g. changing light bulbs in AIB ceiling) |
| | 2 | Medium disturbance (e.g. lifting one or two AIB ceiling tiles to access a valve) |
| | 3 | High levels of disturbance (e.g. removing a number of AIB ceiling tiles for recabbling) |
| Frequency of maintenance activity | 0 | ACM unlikely to be disturbed for maintenance |
| | 1 | ≤1 per year |
| | 2 | >1 per year |
| | 3 | >1 per month |

Appendix 3 - Background and Legislation

What is Asbestos?

Asbestos is a term used for the fibrous forms of several naturally occurring silicate minerals. The fibres have high tensile strength and chemical, electrical and heat resistance which mean asbestos containing materials (ACMs) have been used extensively in building products such as roofing, cladding, thermal insulation and fire-resistant internal panelling. Millions of tonnes of asbestos materials have been imported into the UK since 1880, of which the largest proportions have been used in building products, the peak use being in the 1960's and 1970's.

The three main types of asbestos used commercially are:

- Crocidolite - 'blue asbestos'
- Amosite - 'brown asbestos'
- Chrysotile - 'white asbestos'

Other forms of asbestos are also found but are much less common. Different types of asbestos present different levels of risk, those fibres in the amphibole group (including blue and brown) present a higher risk than the serpentine group (white asbestos). Colour is not a reliable indicator of the type of asbestos used - in the manufacturing process the raw asbestos is mixed with various other materials which makes laboratory analysis the only way to identify the type of asbestos used.

What are the Risks?

Although asbestos is a hazardous material it can only pose a risk to health if the fibres become airborne and are then inhaled. Therefore, the risks related to asbestos are low unless the material becomes disturbed. Breathing in asbestos fibres can lead a range of serious diseases, many of which are fatal; these include;

- **Asbestosis** - Asbestosis is a serious scarring condition of the lung that normally occurs after heavy exposure to asbestos over many years. This condition can cause progressive shortness of breath, and in severe cases can be fatal.
- **Lung cancer** - Asbestos-related lung cancer is the same as (looks the same as) lung cancer caused by smoking and other causes. It is estimated that there is around one lung cancer for every mesothelioma death.
- **Mesothelioma** - a cancer which affects the lining of the lungs (pleura) and the lining surrounding the lower digestive tract (peritoneum). It is almost exclusively related to asbestos exposure and by the time it is diagnosed, it is almost always fatal

The risk of developing an asbestos-related disease depends on a number of factors including the cumulative dose received, the time since first exposure and the type and size of the asbestos fibres as well as the health of the individual. There is usually a long delay between first exposure to asbestos and the onset of disease. This can vary from 15 to 60 years.

Asbestos is the biggest single cause of work-related death and ill-health in Britain.

Legislation

Since the first introduction of the Asbestos Prohibitions Regulations in 1985, the importation and use of all types of asbestos within the UK has gradually been banned with few specific exceptions. Work with and involving asbestos is now covered under a number of different pieces of legislation including;

The Control of Asbestos Regulations 2012 regulate how work with asbestos containing materials must be carried out, control measures, prevention of exposure to and spread of asbestos, training and the use of licensed asbestos removal contractors for certain types of work. Regulation 4 places a 'duty to manage' asbestos on those responsible for non-domestic premises. The requirements of regulation 4 include the need to identify the presence of asbestos, assess the risk and have a written plan in place to manage the risk.

The Health and Safety at Work etc Act 1974 applies to all risks and requires employers to conduct their work in such a way that their employees will not be exposed to health and safety risks, and to provide information to other people about their workplace which might affect their health and safety.

The Management of Health and Safety at Work Regulations 1999 (MHSW) require employers and self-employed people to make an assessment of the risks to the health and safety of themselves, employees and people not in their employment arising out of or in connection with the conduct of their business - and to make appropriate arrangements for protecting those people's health and safety.

The Construction (Design and Management) Regulations 2015 require the client to pass on information about risks (including the presence of hazardous materials such as asbestos) to designers and contractors before any work commences and to ensure that work is planned and carried out so as to reduce risk.

The Workplace (Health Safety and Welfare) Regulations 1992 require employers to maintain workplace buildings so as to protect occupants and workers.

Hazardous Waste (England and Wales) Regulations 2005 require hazardous waste (including asbestos) to be stored, collected, transported and disposed of in controlled ways and consignment notes to be issued and retained to demonstrate this.

The Defective Premises Act 1972 in England and Wales This regulation places a duty on Landlords to take reasonable care to ensure tenants and other building users are safe from personal injury or disease due to defects.

Appendix 4 – Glossary of Terms

| | |
|---------------------------------------|---|
| ACM | Asbestos Containing Material. |
| AIB | Asbestos Insulation Board. This product is a lightly compressed board made from asbestos fibre and other filler materials. |
| ACoP | Approved Code of Practice. Guidance document giving advice on the preferred means of compliance with the Control of Asbestos Regulations 2012. There are two ACoPs specifically for the Control of Asbestos Regulations 2012. |
| L127 | ‘The Management of Asbestos in Non-domestic Premises’. Document aimed at those who have repair and maintenance responsibilities for non-domestic premises. This document provides advice on how to comply with Regulation 4 of the Control of Asbestos Regulations 2012. |
| L143 | ‘Work with Materials Containing Asbestos’. This ACoP applies to all work with asbestos. This document provides advice on the preferred means of compliance with the Control of Asbestos Regulations 2012. |
| ARCA | Asbestos Removal Contractors Association (www.arca.org.uk). |
| Asbestos | A naturally occurring, fibrous, silicate mineral. The Control of Asbestos Regulations, 2012 refers to any material or product containing any of the asbestos types. |
| Asbestos Register | A summary list of all identified items containing asbestos, their condition, location, any comments or recommendations and the type and extent of asbestos present. These documents are produced after an asbestos survey and should contain all analytical results, drawings, and a full introduction and methodology. |
| CAR 12 | Control of Asbestos Regulations 2012. The current regulation requiring employers to prevent or minimise the risk to employees from the exposure to asbestos |
| Control Measure | Something that will <i>reduce</i> the risk posed by that hazard. |
| Date for Action | This details the timescale that remedial option should be undertaken. As and when any works are undertaken, all Asbestos Records must be updated. |
| Encapsulation (Recommendation) | Some exposed or damaged asbestos material may require encapsulation that can significantly reduce the risk posed by the material. Once encapsulated it may be suitable to simply manage the asbestos through an effective re-inspection regime. The re-assessment of the material will dictate this outcome. |
| Extent | Indicates the length, volume, or area of the asbestos containing material. |
| Hazard | Something that has the <i>potential</i> to harm a person or persons |
| Identified Asbestos | Refers to a brief description of the material found to contain asbestos. |
| Location | The exact location of the asbestos – the original survey report should be consulted to give more detailed information. |
| Manage (Recommendation) | Asbestos that is in good condition and is unlikely to be disturbed can be simply managed. However, an appropriate re-inspection regime will still need to be implemented to ensure that the condition of the material or building use does not change. |
| Material Assessment | Assesses the type and condition of the ACM and the ease with which it will release fibres if disturbed. |

| | |
|---------------------------------|--|
| MMMMF | Man Made Mineral Fibre. These products are often used as an asbestos alternative, and include products such as fibreglass. |
| Presumed ACM | An ACM which has not been sampled but through sampling of similar ACMs in the same location, can reasonably be 'presumed' to be the same. This is an approved survey method to reduce the number of samples requiring analysis. |
| PPE | Personal Protective Equipment: refers to protective clothing (coveralls), hard hats, goggles, safety boots or other gear designed to protect the wearer's body or clothing from injury. |
| Priority Assessment | assesses the likelihood of someone disturbing the ACM |
| Removal (Recommendation) | This indicates that, based on the assessment conducted, the recommended approach is to have the asbestos physically removed. Recommendations are based on the parameters available at the time. New information or a change in circumstance may alter these recommendations. All products falling under the Asbestos Licensing Regulations will require a licensed contractor. |
| Risk | The <i>likelihood</i> of that hazard causing harm |
| Risk Assessment | Risk rating given to each identified item of asbestos which incorporates factors such as the location and condition of the material, its likelihood of being disturbed, the materials use, and an indication of how urgent any remedial works may be. |
| Risk Score | This is the overall risk score that has been derived for completing and adding together of the Material and Priority Assessments. It states the overall risk that the item of asbestos represents in terms of likelihood of exposure. |
| RPE | Respiratory Protective Equipment: refers to protective equipment worn to protect the respiratory system (for example, half mask, and full face mask). |
| UKAS | The United Kingdom Accreditation Service is the sole national accreditation body recognised by government to assess, against internationally agreed standards, organisations that provide certification, testing, inspection and calibration services. |

Appendix 5 – Template letter to residents

Date

Dear

The table below summarises the findings of the asbestos survey recently conducted at your home, regarding materials known or presumed to be asbestos.

| Location | Asbestos Material | Quantity (Approx) | Risk Status | Recommended Action |
|----------|-------------------|-------------------|-------------|--------------------|
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |

Asbestos materials that are maintained and are in good condition do not present a health risk. We have assessed that this is the situation for your home.

The Health and Safety Executive’s guidance on dealing with various types of materials are to leave it in situ. Asbestos will usually only be removed if it is damaged or likely to deteriorate, or when programmed works are required.

Should you believe that any of the materials listed above have become damaged in any way or that the condition has deteriorated, please contact us via the Mitie Customer Services on:

TEL: **0800 023 4499** so the appropriate action can be taken.

Should you wish to undertake any DIY works within your home, please contact Mitie on the same number to arrange for the works to be approved or actioned prior to starting.

Please also contact me, should you need any further guidance or advice about asbestos in your home.

Yours sincerely