

FORTH HOUSING ASSOCIATION LIMITED

ASBESTOS Management Plan

Code: M21

Approval: FEBRUARY 2022

Review Date: FEBRUARY 2025

Cross Reference: HSCM January 2017 V3
M20 Asbestos Policy

1.0 Introduction

The purpose of the Asbestos Management Plan is to ensure that all reasonably practicable steps have been taken to prevent the risk of exposure of Forth tenants, visitors, staff, and contractors to asbestos in a manner that could adversely affect their health. The key part of the Plan is to warn people coming to work on a building of the presence of asbestos containing materials (ACMs), to prevent accidental exposure. The overall aim of long-term asbestos management is to ensure that all ACMs, through inspection, remedial or removal works are effectively managed, and the risk is reduced to its lowest level.

1.1 Responsibilities

The Tenant Services Manager (**TSM**) will be responsible for ensuring formulation, monitoring and review of the Asbestos Management Plan. The Senior Property Services Officers (**SPSO**) will be responsible for the role as Asbestos Co-ordinator and will take on the role of the TSM in their absence

The Property Service Officers (PSO) will be responsible for the role of Assistant Asbestos Co-Ordinator and will take on the role of Asbestos Co-ordinator in the absence of the TSM and SPSO.

The Asbestos Co-Ordinator will: Ensure that the Association is complying with current legislation and the Association's procedures; Monitor the Action Plan and Register; Maintain the Asbestos Register, including advising contractors and consultants of the presence of asbestos where appropriate; Co-ordinate the Asbestos Management Strategy; / maintain a record of asbestos related training and ensure that staff are given a level of training that is appropriate to the post; Co-ordinate asbestos surveys and sampling; Co-ordinate asbestos removal/remediation works; Liaise with 'non-asbestos' works contractors;) ensure that all appropriate asbestos information is provided and/or obtained and properly interpreted where works are liable to disturb the fabric of buildings/ ensure adequate surveys are carried out prior to any upgrades such as bathroom and kitchen replacement.

The Assistant Asbestos Co-Ordinator will be responsible Identifying any suspect materials during void inspections and routine inspection that may contain asbestos in properties constructed prior to 2020 and arrange removal.

2.0 Asbestos Register

The **Asbestos Co-ordinator** will ensure that an appropriate register of known or suspected location of ACMs within Forth owned properties is maintained. The Asbestos Register will be updated as ACMs are identified or removed and will be available for inspection at Forth's office. All persons identifying asbestos-based materials should inform the **TSM and the Asbestos Co-ordinator** to enable the Register to be kept up to date. The purpose of the Register is to formally record, through survey and inspection, the location and condition of asbestos in Association premises. The accuracy of the information contained in the Register will be assured by regular inspections when it will be the responsibility of suitably trained staff to assess the condition of asbestos and make any necessary amendments to information contained in the Register. Where changes in the condition of asbestos are identified the inspector must immediately report the matter to the Asbestos Co-ordinator. The Register must be as accurate as possible and must be brought to the attention of any person conducting any alteration work to buildings, which may risk exposure to building materials on Association owned premises.

3.0 **Proactive Response**

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

- Develop a systematic programme for identifying the presence of asbestos in certain Association premises (currently common housing areas, houses where information suggests that there is a risk of asbestos and non-housing structures)
- Identify the current condition of asbestos in Association properties (so that any remedial work can be priced and scheduled).
- Assess the risk of likelihood of anyone being exposed to asbestos
- Monitor and manage the discovery of suspected asbestos materials and any work in proximity to asbestos.
 - Co-ordinate awareness training for relevant staff, contractors, and any other relevant persons.
- Review the Asbestos Management System periodically.
 - Where the Associations premises and common areas of housing stock were built or renovated prior to 2000, an Asbestos Management Survey programme will be carried out by a competent UKAS accredited asbestos management consultancy. (HSE expects that no asbestos containing materials would be in use from 2000.) The surveyor and the Association should jointly determine an appropriate strategy to cost-effectively assess relevant premises, taking account of the permissibility of 'representative' surveying across properties of the same archetype and construction date.
 - We note that current legislation does not subject 'domestic dwellings' to the requirement for Asbestos Management Surveys (although Refurbishment and Demolition Surveys are required – see below).

However, the Association will take a view on whether to adopt the increasingly common stance of undertaking Management Surveys to domestic dwellings.

- The findings of all surveys undertaken will be used to prepare a Register of Asbestos containing materials (including their location and condition along with details on how best to manage / remediate the material) in all relevant premises.

- The asbestos management plan will be annually reviewed/developed and implemented, ensuring that all asbestos containing materials are properly managed. This will include procedures for re-inspecting materials and carrying out remedial works where necessary.

- Prior to any work being carried out on the fabric of (pre-2000) buildings, the asbestos register will be interrogated to determine whether asbestos may be encountered and appropriate precautions (including the use of HSE licensed contractors where necessary) will be taken. Where the works are likely to disturb material not included in the registers (e.g., behind wall panels, within voids, etc.), then point below will apply.

- Prior to any refurbishment, demolition or repair works on building fabric, which is not known to be asbestos free, a competent UKAS accredited asbestos management consultancy will be commissioned to carry out a 'Refurbishment or Demolition' (i.e., intrusive) asbestos survey of the area to be worked upon.

- The surveyor and the Association should jointly determine an appropriate strategy to cost-effectively assess relevant premises, taking account of the permissibility of 'representative' surveying across properties of the same archetype and construction date. Prior to works starting, the information obtained from 5 Refurbishment/ Demolition Surveys will be discussed with the proposed works contractor (or internal direct works staff) to ensure that ACM's will not be disturbed by their works. In the event that works would have the potential to disturb ACM's, appropriate measures will be taken, including the prior removal of ACM's, amendments to work programme, etc.
- Records of all surveys and discussions with contractors will be retained in the Job File to demonstrate that asbestos was properly considered, and appropriate actions taken to prevent disturbance and exposure.

4.0 Reactive Response

This includes procedures to be adopted where a material suspected of being asbestos is discovered either accidentally or during work.

Those potentially exposed include all users of Association premises and others including contractors carrying out work on behalf of the Association. The person locating the suspected asbestos has a duty to inform the Asbestos Coordinator who will stop the work if this has not already happened, consider the desirability of vacating the building or part of the

building to avoid exposure and appoint a UKAS consultant to advise the Association. Procedures to be adopted will be site specific and should as far as is practical take account of location/type/form/volume and condition of the asbestos. It is the responsibility of all staff to report to the Asbestos Co-ordinator if they suspect that disturbed or damaged asbestos containing materials may be present in a building owned or occupied by the Association. In a case where an accessible material is suspected of containing asbestos, and where this material may become disturbed, this would also apply. In such cases, an external consultant having UKAS (United Kingdom Accreditation Service) accreditation for asbestos sampling and analysis, will be contacted to conduct identification. If asbestos is identified within the sample, advice will be obtained from a competent consultant on the appropriate course of action. Where damage to any material known to contain asbestos has taken place and is likely to give rise to airborne respirable fiber release, the Asbestos Coordinator will arrange for isolation of the area pending an investigation. They will arrange for air monitoring tests (measurement of airborne fiber concentrations) to be conducted and sampling and analysis will be conducted by an independent UKAS accredited Organization to determine the level of any potential contamination, or to provide reassurance that unacceptable contamination has not occurred. Details of air test results will be made available for inspection and record purposes. Remedial action will be required when airborne fiber levels exceed 0.01 f/cc. The nature of the remedial work must be agreed with the person responsible for Forth Housing Association. When remedial action becomes necessary after exposure, the relevant facts may have to be reported to the HSE in accordance with the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR). (Advice may be sought from a competent Asbestos Consultant to determine whether the incident is in fact RIDDOR reportable.)

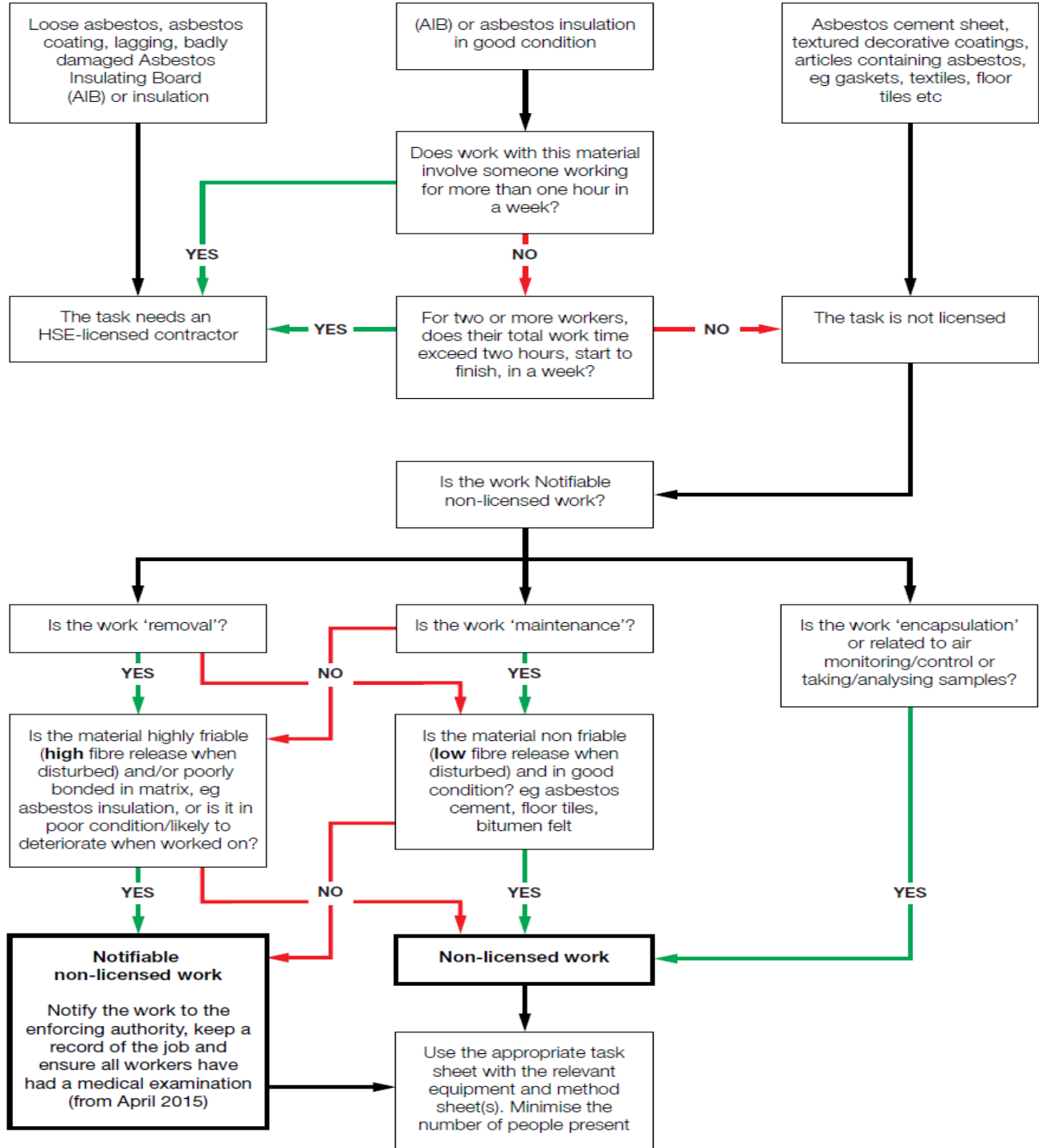
Where accidental damage of ACMs takes place, the following action must be taken immediately:

- (a) The area must not be entered without appropriate protective equipment
- (b) Ensure that the area is cleared of tenants, visitors, and staff
- (c) Contact Forth's **TSM or AC immediately**. The TSM or AC or AAC will consult with the Director to determine if any damage or accidental release is notifiable to The Scottish Housing Regulator. The Director will take the necessary steps in reporting it as a priority

The following HSE flowchart shows the decision-making process on appropriate classification of works:

Decision flow chart

Use this simple flow chart to help you decide who needs to do the work:



5.0 SDM Housing Management System

Properties that contain asbestos will have warning flags enabled on the management system. This will warn all staff of the presence and location of asbestos within the property.

All job lines raised to contractors will advise of asbestos within the property automatically.

6.0 Drawings and Plans

Where applicable drawings and plans supplied to contractors by Forth must identify the presence of suspected ACMs.

7.0 Contractors

All relevant information on the presence of or suspected presence of ACMs will be passed in writing to the appropriate personnel and Contractors.

8.0 Construction (Design & Management) Regulations 2015 (Demolition and Refurbishment works)

Where the above Regulations apply to any project then the pre-tender Health & Safety Plan must contain relevant information on the presence of known or suspected ACMs. (See 3.0 Refurbishment work)

9.0 Training

Forth technical staff will be required to attend asbestos awareness training sessions. In addition, contract maintenance staff employed in areas where ACMs may be present will be required to demonstrate that their staff have attended similar training.

10.0 Identification

ACMs which could be disturbed by maintenance staff or contractors should be clearly labelled. Where labelling may not be appropriate, it is essential that those who may work or disturb the material are made aware of the presence of asbestos.

11.0 Condition

The overall aim of long-term asbestos management is to ensure that all ACMs, through inspections, remedial or removal work are effectively managed, and risk is reduced to its lowest practical level. Following inspection of areas found to have asbestos present, assess the risk of asbestos fibres being released into the air; this must consider the material's condition and how likely it is to be damaged or disturbed.

- For areas with minor damage -

The material should be repaired and/or encapsulated

The condition of the material should be monitored at regular intervals.

Where practicable, the material should be labelled.

Inform the contractor and any other worker likely to work on or disturb the material

- For areas in good condition -

The condition of the material should be monitored at regular intervals.

Where practicable the material should be labelled

Inform the contractor and any other worker likely to work on or disturb the material.

- For areas in poor condition –

Asbestos in poor condition should be removed by a competent and licensed contractor.

- For areas likely to be disturbed –

Asbestos likely to be disturbed should be removed by a competent contractor

12.0 Asbestos Audit

Where necessary prior to work taking place Forth will undertake an audit of the proposed work area and representative samples will be used to identify asbestos as far as reasonably practicable.

13.0 Asbestos Removal

Removal of ACMs will only be carried out by licensed contractors in accordance with current Health & Safety regulations.

14.0 Disposal

All waste that contains asbestos will be disposed of under the 1996 Special Waste Regulations. All asbestos waste will be disposed of by an approved asbestos waste disposal contractor. Appropriate records will be required by Forth who will maintain a record of these.

15.0 Inspections

Periodic inspections of ACMs left in place will be undertaken by the **PSO** to ensure that the condition of the material has not changed. The period between inspections will depend on the type of material, its location and condition. This information will be used to update the asbestos register.

16.0 Monitoring of this Plan

In order to check that the arrangements to control the risk from ACMs, as set out in this Plan, have been put in place and are working effectively, the Plan will be monitored by the **TSM**. The Plan will also be reviewed by the **TSM** if there are significant changes that will affect the arrangements described, for example, if maintenance work is carried out or if any ACMs are removed.

17.0 Review

Management Committee will review this Plan at least every three years and staff are responsible for ensuring that they meet legal and good practice requirements.