

FORTH HOUSING ASSOCIATION LIMITED

ASBESTOS POLICY

Governance: Maintenance

Code: M20

Approval: September 2024

Review Date: September 2027

Cross Reference: M21 Asbestos Management Plan and Organisational Chart

Appendix A Asbestos Management Plan



This document can be made available in alternative languages or formats (such as large print, audio etc). Please contact staff as required.

Policy Summary

This policy has been developed to show how Forth Housing Association monitors, and manages Asbestos, and Asbestos containing material within its properties.

Equalities

There is no requirement to do a full Equality Impact Assessment.

Privacy

There is no requirement to do a full Privacy Impact Assessment.

Policy Owner

Name: Senior Property Officer

Date of Next Review: September 2027

FORTH HOUSING ASSOCIATION LIMITED

Asbestos Policy

1.0 Introduction

- 1.1 Asbestos, once a common building material due to its durability and heat resistance, poses significant health risks when its fibres become airborne and are inhaled. In Scotland, the management of asbestos in housing is governed by stringent regulations to ensure the safety of residents. The Control of Asbestos Regulations 2012 mandates that property owners and those responsible for maintenance must take proactive steps to identify and manage asbestos-containing materials (ACMs) in properties.
- 1.2 The use of asbestos was banned in the UK in 1999, but many older properties still contain ACMs. Proper management involves conducting professional asbestos surveys, maintaining an asbestos register, and implementing an Asbestos Management Plan (AMP) to minimise exposure risks. For social housing, landlords have specific responsibilities to regularly inspect and manage asbestos to protect tenants.
- 1.3.1 Understanding and adhering to these regulations is crucial not only for compliance but also for safeguarding the health and well-being of all occupants

2.0 Principles

- 2.1 The following legislation has been considered whilst developing the Asbestos Policy:
 - Health and Safety at Work etc. Act 1974
 - Control of Asbestos Regulations 2012
 - INDG 223 A Short Guide to Managing Asbestos in Premises
 - HSG264 Asbestos: A survey guide

3.0 Aims and Objectives

- 3.1 The Scottish Government Scottish Housing Quality Standards state that properties must be compliant with the current tolerable Standard, specifically, free from serious disrepair and safe and secure.

3.2 This policy is aligned to Standards 1 and 3 of the Scottish Housing Regulator's (SHR) Regulation Framework:

- Standard 1 The governing body leads and directs the RSL to achieve good outcomes for its tenants and other service users.
- Standard 3 'The RSL manages its resources to ensure its financial wellbeing and economic effectiveness'.

3.3 This policy appears on Forth Housing Association's Risk Register. The register outlines the control measures for managing this risk:

- Annual Asbestos Management Inspections and risk assessments.

3.4 The presence of an asbestos containing material in itself does not constitute a danger. However, there is a potential risk to health if such material is disturbed and damaged. An isolated accidental exposure to asbestos fibres for a short duration is extremely unlikely to result in the development of asbestos related diseases. However, regular exposure – even at relatively low levels – can present a risk. As well as people employed in the building trades, inadvertent exposure (and consequent risk) can occur in other groups of people e.g. installers of burglar alarms, smoke detectors, etc. Maintenance and repair contracts will also take place in the future, and it is important, therefore, to have in place a management system which minimises the potential for exposure to asbestos.

3.5 Working with and managing asbestos materials is now very tightly regulated via several different Legislative provisions. The purpose of this Policy is to ensure that Forth Housing complies with all current Legislation, Codes of Practice and Health and Safety Executive Guidance Notes.

3.6 It is the policy of Forth Housing to ensure that, as far as is reasonably practicable, no persons are exposed to risks to their health due to exposure to any asbestos containing materials that may be present in any of the properties it owns or occupies.

3.7 This Asbestos Policy conforms with the Health and Safety at Work etc. Act 1974 and the Control of Asbestos Regulations 2012. The Policy and Procedures will apply to all buildings and all individuals employed by the Association, to contractors/subcontractors engaged by us and to our tenants.

3.8 This policy is in place to:

- ensure the prevention of exposure to risks associated with asbestos containing materials.
- ensure that any asbestos containing materials that may be present in any of its buildings are maintained in a condition so as to prevent the possibility of any harm to health occurring.
- promote awareness of the risks from asbestos containing materials and the Management Procedures through training and induction of relevant staff. Key staff involved in the delivery of this Policy will receive annual re-training.
- provide adequate resources to ensure the provision of appropriate information, instruction and training.
- ensure a commitment to comply with all relevant asbestos legislation, Approved Codes of Practice, Health and Safety Executive Guidance Notes and to commit to the safe disposal of any asbestos waste in accordance with the appropriate legislation.
- ensure that an appropriate asbestos surveying process remains in place, taking account of the need for Asbestos Management, Refurbishment and Demolition Surveys in accordance with current legislation and maintain an Asbestos Register.
- implement an effective asbestos management strategy in order that appropriate measures such as encapsulation, labelling, inspection, working with, or removal of, the material can be undertaken.
- ensure that an appropriate system is installed, maintained and implemented for the management of all asbestos containing materials identified in the Register. Such a system is to be capable of recording the risk, the needs and priorities for treatment and/or removal.
- ensure that all Contractors and Subcontractors engaged to carry out work on any of the Organisation's buildings are provided with adequate information on asbestos which may be disturbed by their works.
- ensure that information regarding the presence of asbestos is contained in tender documentation as may be appropriate.
- ensure Licensed Contractors and/or Subcontractors carry out ALL Asbestos Major Works and Competent Contractors carry out all Asbestos Minor Works.
- ensure all Non – Licensed Contractors carrying out Asbestos Minor Works are trained in safe working procedures and have appropriate insurance cover for the work being carried out.
- ensure that relevant staff of the Organisation and contractors (as identified by a Training Needs Analysis) have appropriate training in this Policy and Procedures.
- regularly review the Asbestos Management Policy and Procedures.

4.0 Policy Framework

Asbestos Roles

- 4.1 Whilst the Senior Property Officer for Forth Housing will have responsibility for the overall asbestos management system, the Association will define and allocate roles and responsibilities to ensure the fulfilment of the policy and procedures on a practical level.
- 4.2 The defined roles will include an Asbestos Co-ordinator, i.e. a Property Officer, who will be tasked with maintaining the Asbestos Register and for co-ordinating asbestos surveys and sampling as well as asbestos removal/remediation works. This role will also include liaison with 'non-asbestos' works contractors, ensuring that all appropriate asbestos information is provided and/or obtained and properly interpreted where works are liable to disturb the fabric of buildings.

Prohibition on Staff Handling Asbestos

- 4.3 Unless trained to do so, no staff member will be permitted to handle or work on asbestos containing materials (ACM's).
- 4.4 In the event that the Association opts to handle ACM's (e.g. for the purposes of sampling), appropriate training will be provided, insurances obtained, and these procedures updated to reflect the acceptable process.

Identification of Suspect Material – Damaged, Disturbed or Previously Unidentified

- 4.5 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 reasonably *become* disturbed, this would also apply.
- 4.6 In such cases, an external consultant having UKAS (United Kingdom Accreditation Service) accreditation for asbestos sampling and analysis, will be contacted to carry out identification.
- 4.7 If asbestos is identified within the sample, advice will be obtained from a competent consultant on the appropriate course of action.
- 4.8 Where damage to any material known to contain asbestos has taken place and is likely to give rise to airborne respirable fibre release, the Asbestos Co-Ordinator will arrange for isolation of the area pending an investigation. This staff member will arrange for air monitoring tests (measurement of airborne fibre concentrations) to be carried out and sampling and analysis will be carried out by an independent UKAS accredited This will allow Forth

Housing to determine the level of any potential contamination, or to provide reassurance that unacceptable contamination has not occurred.

- 4.9 Details of air test results will be made available for inspection and record purposes.
- 4.10 Remedial action will be required when airborne fibre levels **exceed 0.01 f/cc**. The nature of the remedial work must be agreed with the Senior Manager Responsible for LFHS&W.
- 4.11 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.)

Asbestos Surveys and Management Plans – Normal Occupancy of Premises

- 4.12 Where Association 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.

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.

- 4.13 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.
- 4.14 An asbestos management plan will be developed and implemented, ensuring that all asbestos containing materials are effectively managed. This will include procedures for re-inspecting materials and carrying out remedial works where necessary.
- 4.15 For the avoidance of doubt, such an asbestos management plan will be necessary where any amount of asbestos is known or suspected to be present in premises. Each plan's depth and complexity may vary,

depending upon the local circumstances and potential risks involved (e.g. at a basic level a summary of actions in the asbestos register may be deemed acceptable), but all will clearly demonstrate their intended purpose of managing the risks associated with ACM's.

- 4.16 The "Asbestos Co-ordinator" will be responsible for maintaining the Registers and Plans, organising surveys and re-inspections, etc.

Asbestos Surveys – Prior to Work on Premises

- 4.17 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.), 4.8 and 4.21 will apply.
- 4.18 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.
- 4.19 Prior to works starting, the information obtained from Refurbishment/Demolition Surveys will be discussed with the proposed works contractor 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.
- 4.20 Records of all surveys and discussions with contractors will be retained to demonstrate that asbestos was carefully considered and appropriate actions taken to prevent disturbance and exposure.

Work with Asbestos Materials

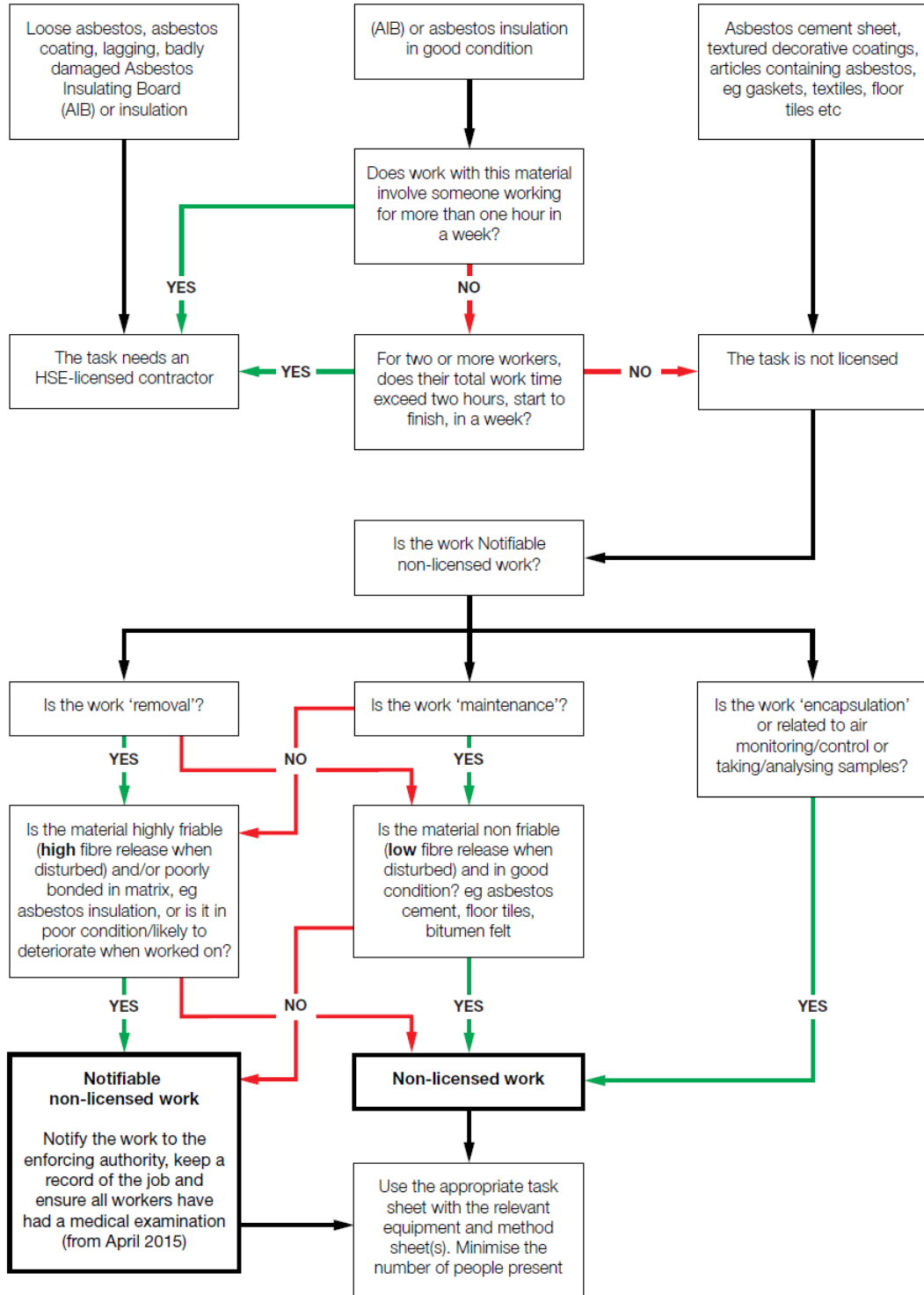
- 4.21 Most work likely to disturb or remove asbestos must be carried out by an HSE licensed asbestos removal contractor and notified to the HSE 14 days prior to commencement. However, the Control of Asbestos Regulations 2012 does allow work with certain lower risk asbestos containing materials (e.g. asbestos cement and asbestos textured coatings) to be carried out by non-licensed personnel and without notification to the HSE. The three categories of asbestos work are:

- Major Works: Licensed works – 14-day notification and licenced contractor (highest risk work)
- Minor Works: Notifiable non-licensed works – notification before works start and competent (non-licensed) contractor
- Minor Works: Non-notifiable non-licensed works – no notification and competent (non-licensed contractor)

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:



- 4.22 Where any doubts exists over the correct classification or scope of asbestos works, advice will be sought from a competent UKAS accredited asbestos management consultancy prior to any works being carried out on asbestos containing materials. The Association may also appoint a competent Asbestos Project Management consultancy to scope, specify, tender and project manage asbestos contracts.
- 4.23 Where work does not require to be carried out by licensed contractors (i.e. Minor Works) it will, nevertheless, be undertaken in a safe manner, by appropriately trained personnel, reducing the generation of airborne dusts to as low a level as is reasonably practicable. All method statements and risk assessments for such work will be screened by a competent person prior to work commencing.
- 4.24 Where licensed contractors are required to carry out asbestos works, the following documentation will be requested from the contractor prior to commissioning, and copies kept:
- current asbestos licence check on HSE website
 - insurance certificate indicating the insured is covered for asbestos work
 - a representative sample of medical examination certificates (conducted by an Employment Medical Advisory Service registered doctor) for personnel who will work on the job
 - a representative sample of training records for all personnel who will work on the job (asbestos management and handling courses), usually provided by a United Kingdom Asbestos Training Association (UKATA) member
 - where applicable, notification of the job to the HSE 14 days prior to commencement
 - method statement and risk assessment for the job (Plan of Work)
- 4.25 At the conclusion of all asbestos works (unless included within an Asbestos Project Management package), the Association will directly appoint a UKAS accredited Asbestos Analyst to carry out the required level of inspection and test. For licensed works this will include a '4-stage clearance test' and for minor works this will include a visual inspection and reassurance air test. Care will be taken to ensure this is EXCLUDED from the contractor's initial proposal and price.

Tenant Information and Work Procedures

- 4.26 The Association will establish its policy on informing tenants of the possibility of ACM's being present in pre-2000 housing and on the requirements for undertaking work on their dwellings. Any such information will be subject to a formal distribution procedure.

- 4.27 Prior to a tenant starting work which will interfere with the fabric and/or services of a property, tenants will be required to seek advance permission from the Association. Before issuing permission, the Asbestos Register will be consulted and, where ACM's are identified within the proposed work zone the Maintenance Team will liaise with the tenant to ensure all appropriate actions are taken. Where the asbestos data is inconclusive (e.g. where a Refurbishment Survey has not been carried out, the Association will review the request and decide whether to refuse permission or to arrange for a Refurbishment Survey to be carried out.
- 4.28 In the event that tenants' works are liable to disturb ACM's, the Association will make a decision on the appropriate course of action, ensuring that all asbestos works are subject to the normal asbestos work procedures of the Association.
- 4.29 Forth Housing Association (FHA) has asbestos containing material (ACM) in one of its buildings within the Kildean Enterprise Hub. The ACM is a ceiling cement board within the boiler house at Stirling Community Enterprise. The ceiling panel is currently encapsulated with fireproof paint and has warning label on the panel. The door to the boiler room has a warning notice and we have the panel electronically recorded within our Housing Management Software and our Asbestos Register. Any work instructions issued to contractors to carry out work within that area has a warning flag on the job order. The panel is inspected annually by asbestos surveyors who check the condition of the material for any damage.

5.0 Monitoring of the Policy

- 5.1 The Management Committee will review this policy at least every 3 years and staff are responsible for ensuring that it meets legal and good practice requirements and will monitor any changes advised in the interim period for the review.

6.0 Complaints and Appeals

- 6.1 Forth Housing Association welcomes complaints and positive feedback, both of which provide information which helps us to improve our services. We use a complaints procedure developed by the Scottish Public Services Ombudsman (SPSO) and the Scottish Housing Regulator.

The complaints procedure allows for most complaints to be resolved by front line staff within a five-day limit (first stage), or if the complaint is complex, a detailed investigation will be made by a manager within a 20-day limit (second stage). At the end of the second stage our response will be made

by a director. If the customer remains dissatisfied, he/ she may then refer the matter to the SPSO.

At each stage we will advise the customer how the complaint should be taken forward and advise which agency would be most appropriate to consider the case.

7.0 Equalities

7.1 Equality and diversity underpin all our activities and services. When delivering our services, we never discriminate on the basis of sex or marital status, race, disability, age, sexual orientation, language, social origin, or of other personal attributes, including beliefs or opinions such as religious beliefs or political opinions. Full details of our Equalities Policy can be found on our website www.forthha.org.uk or can be obtained from our office.

8.0 Data Protection - Privacy

8.1 We recognise the importance of data protection legislation, including the General Data Protection Regulation, in protecting the rights of individuals in relation to personal information that we may handle, use and disclose about them, whether on computer or in paper format. We will ensure that our practices in the handling, use and disclosure of personal information as part of the processes and procedures outlined in this policy comply fully with data protection legislation. More information is available from our Data Protection Officer

9.0 Availability

9.1 This policy is available on our website and can be made available in a number of other languages and other formats on request.

10.0 Review

10.1 This policy will be reviewed at least every 3 years by the Management Committee and staff are responsible for ensuring that it meets legal and good practice requirements.

Equality Impact Assessment Screening Questions

Forth Housing Association Ltd

Equality Impact Assessment Screening Questions

Asbestos

Will the implementation of this policy have an impact on any of the following protected characteristics?

- | | | |
|-----------------------------------|------------------------------|--|
| 1. Age | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| 2. Disability | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| 3. Gender reassignment | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| 4. Marriage and Civil Partnership | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| 5. Pregnancy and Maternity | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| 6. Race | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| 7. Religion or belief | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| 8. Sex | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| 9. Sexual orientation | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |

If you have answered 'Yes' to any of these points, please complete a full Equality Impact Assessment. If you have answered 'No,' you need take no further action in completing an Equality Impact Assessment

Equality Impact Assessment Screening Questions

Forth Housing Association - Privacy Impact Assessment

1. A substantial change to an existing policy, process or system that involves personal information Yes No
2. A new collection of personal information Yes No
- 3.. A new way of collecting personal information (for example collecting it online) Yes No
4. A change in the way personal information is stored or secured Yes No
5. A change to how sensitive information is managed Yes No
6. Transferring personal information outside the EEA or using a third-party contractor Yes No
7. A decision to keep personal information for longer than you have previously Yes No
8. A new use or disclosure of personal information you already hold Yes No
9. A change of policy that results in people having less access to information you hold about them Yes No
10. Surveillance, tracking or monitoring of movements, behaviour or communications Yes No
11. Changes to your premises involving private spaces where clients or customers may disclose their personal information (reception areas, for example) Yes No

If you have answered 'Yes' to any of these points, please complete a full Privacy Impact Assessment. If you have answered 'No,' you need take no further action in completing a Privacy Impact Assessment.

Appendix A - Asbestos Management Plan

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 objective of the plan is to:

- Identify and assess the presence and condition of Asbestos Containing Materials (ACMs) in the building
- Implement control measures to prevent the release of asbestos fibres.
- Monitor and review the condition of ACMs regularly.
- Provide training and information to employees and contractors about asbestos risks and safe work practices
- Ensure compliance with relevant legislation and guidelines.
- 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.

2.0 Responsibilities within the Association

- 2.1 The Head of Tenancy Services (**HoTS**) will be responsible for ensuring formulation, monitoring and review of the Asbestos Management Plan.
- 2.2 The Senior Property Officer (**SPO**) will be responsible for the role as Asbestos Co-ordinator and will take on the role of the HoTS in their absence
- 2.3 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 HoTS and SPSO.
- 2.4 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;

- 2.5 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.
- 2.6 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.

3.0 Asbestos Register

- 3.1 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.
- 3.3 All persons identifying asbestos-based materials should inform the **HoTS 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.
- 3.4 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.

4.0 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.

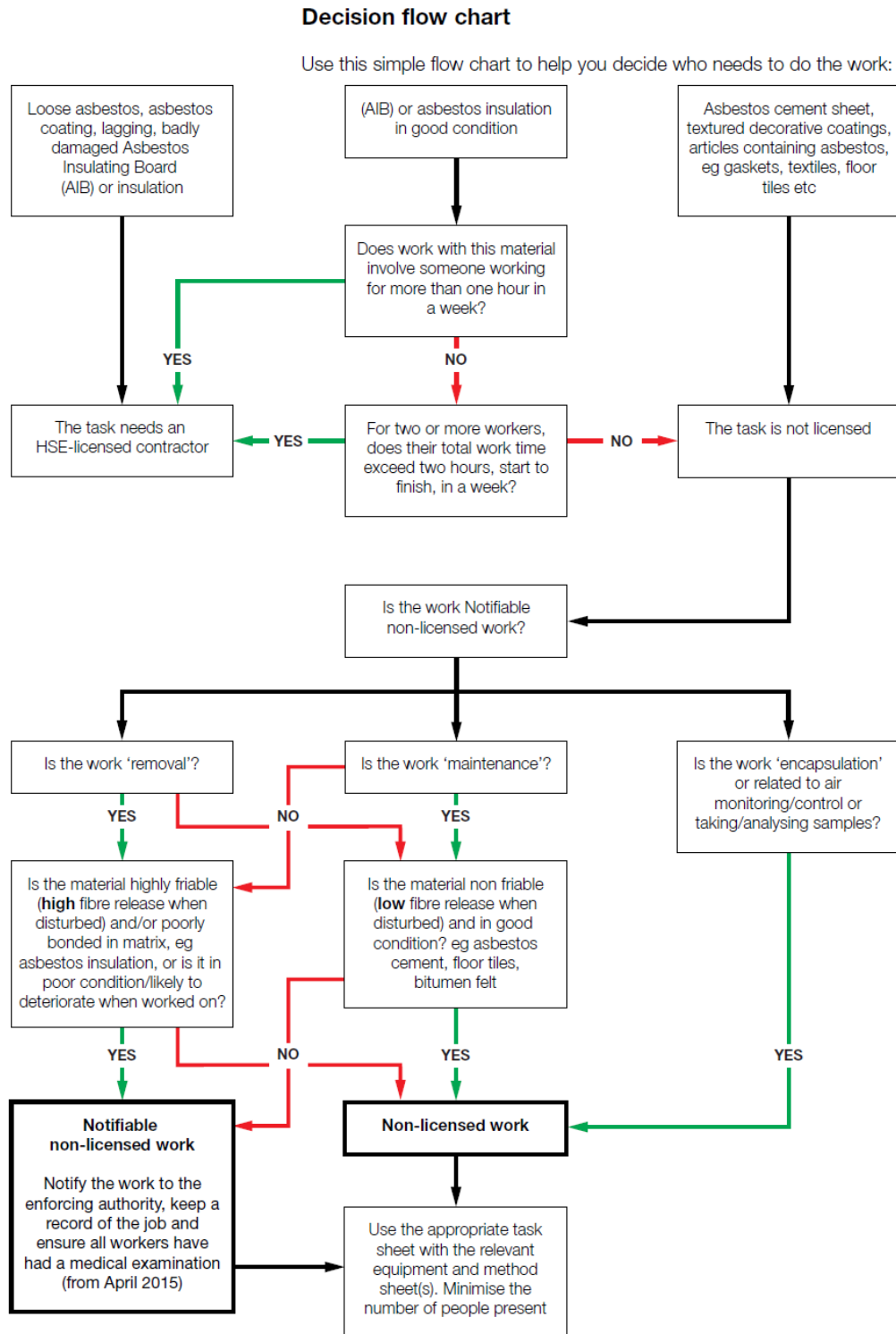
- Prior to any refurbishment, demolition or repair works on building fabric, which is not known to be asbestos free, a competent UKAS accredited asbestos management consultancy will be commissioned to carry out a 'Refurbishment or Demolition' (i.e., intrusive) asbestos survey of the area to be worked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

5.0 Reactive Response

- 5.1 This includes procedures to be adopted where a material suspected of being asbestos is discovered either accidentally or during work.
- 5.2 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.
- 5.3 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.

- 5.4 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 fibre release, the Asbestos Coordinator will arrange for isolation of the area pending an investigation. They will arrange for air monitoring tests (measurement of airborne fibre 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 fibre levels exceed 0.01 f/cc. The nature of the remedial work must be agreed with the person responsible for Forth Housing Association.
- 5.5 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.)
- 5.6 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 **HoTS or AC immediately**. The HoTS 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

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



6.0 SDM Housing Management System

- 6.1 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.

7.0 Drawings and Plans

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

8.0 Contractors

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

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

- 9.1 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)

10.0 Training

- 10.1 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.

11.0 Identification

- 11.1 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.

12.0 Condition

12.1 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

13.0 Asbestos Audit

13.1 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.

14.0 Asbestos Removal

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

15.0 Disposal

- 15.1 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.

16.0 Inspections

- 16.1 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.

17.0 Monitoring of this Plan

- 17.1 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 **HoTS**. The Plan will also be reviewed by the **HoTS** 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.

18.0 Review

- 18.1 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.