



Asbestos Management Policy

Version Number	5.0
Date Revision Complete	March 2019
Procedure Owner	Property Investment Manager
Author	Health and Safety Advisor
Reason for Revision	Updated as part of Safety Management System Review
Proof Read	Planned Maintenance Delivery Leader & East Asset Officer
Date Approved	May 2019
Approved by	Operational Management Team
Next Review Due	May 2022

Audience – Training and Awareness Method	To be issued as part SMS update
Effective Date	May 2019

Internal References	N/A
---------------------	-----

External References	N/A
---------------------	-----

Comments	
----------	--

1. Aim of the Policy

- 1.1 This policy sets out how Blackwood will manage Asbestos Containing Materials (ACMs) and those materials presumed to contain ACMs in all its housing and office premises. Blackwoods main aim at all times is to ensure the safety of its customers, contractors and employees by minimising the risk of exposure to ACMs.

2. Background

- 2.1 Asbestos is a fibrous mineral substance used in many applications for fire protection and insulation. There are six types of these minerals, but the most common and well known varieties found in buildings in the UK are Chrysotile (White), Amosite (Brown) and Crocidolite (Blue). ACMs are to be found in a wide variety of common building materials, from ceiling and floor tiles, pipe insulation, wall and ceiling boards (including some textured coatings), corrugated roof sheets, including behind electrical circuit boards and external fascia boards and storage heater insulation. It is generally found in older premises and equipment (normally pre 2000).
- 2.2 ACMs become dangerous when broken up and the fibres are released into the air. When these fibres are inhaled, they can cause serious diseases including mesothelioma, lung cancer and asbestosis. There is usually a long delay between first exposure and the onset of any disease (in the region of 15 – 60 years). Only by preventing or minimising exposure now can asbestos-related disease eventually be reduced.

3. The Duty to Manage Asbestos

- 3.1 The duty to manage asbestos is contained in regulation 4 of the Control of Asbestos Regulations 2012 . It requires Blackwood, where it is the 'dutyholder' to:
- take reasonable steps to find out if there are materials containing asbestos in non-domestic premises, and if so, its amount, where it is and what condition it is in
 - presume materials contain asbestos unless there is strong evidence that they do not
 - make, and keep up-to-date, a record of the location and condition of any ACMs, or materials which are presumed to contain ACMs.
 - assess the risk of anyone being exposed to fibres from the materials identified
 - prepare a plan that sets out in detail how the risks from these materials will be managed
 - take the necessary steps to put the plan into action;

- periodically review and monitor the plan and the arrangements to act on it so that the plan remains relevant and up-to-date; and
- provide information on the location and condition of the materials to anyone who is liable to work on or disturb them

3.2 The thorough inspection of the premises is usually undertaken in the form of a survey. There are two types of asbestos survey available to us;

- Management Survey – for normal day to day occupation and maintenance of the building;
- Refurbishment and Demolition survey - for any planned refurbishment or demolition work

3.3 In respect of Regulation 4 the 'dutyholder' is defined as;

- The person or persons in control of maintenance activities (widest sense) whether that be the occupier, landlord, sub-lessor or managing agent.
- The extent of the duty will in most cases be determined by the degree of responsibility over matters concerning the fabric of the building and the maintenance activities carried out there, i.e. the extent to which they control and or direct maintenance activities.

3.4 The duty to manage ACMs do not normally apply to domestic premises except whereby a landlord is responsible for the tenancy. They do apply to common parts of domestic premises (e.g. foyers, staircases, lifts, etc). However, Blackwood also has a duty of care under the requirements of the Health & Safety at Work etc Act 1974 to ensure, so far as is reasonably practicable, the health & safety at work of all it's employees and others who may be affected by its undertakings, acts and/or omissions. This effectively means that we have legal duties to ensure the health and safety of our employees (and others) in domestic premises if the premises are being used as a place of work (e.g. during maintenance activities).

4. Asbestos Management Plan

4.1 Blackwood will ensure that it has a competent 'Appointed Person' to oversee the management of ACMs within Blackwood properties. The 'Appointed Person' will be fully supported by Blackwood Management and provided with the necessary resources, training and authority to ensure that any ACMs are managed effectively.

- The 'Appointed Person' for Blackwood will be known as the Asbestos Manager.
- We will also ensure that all Estates Officers, Asset Officers, Planned Maintenance Delivery Leader and Reactive Maintenance Delivery Leader

have received suitable asbestos awareness training, which will be recorded on our Learning Management System (LMS).

4.1.1 We will actively take steps to locate any ACMs in our housing and office premises and assess its condition.

- The first step in our assessment process will be to undertake an initial assessment of our property stock, taking into account factors such as the age, type and use, together with any existing records, such as building drawings or previous asbestos surveys. This will enable us to prioritise as necessary more detailed surveys of the properties at greatest risk of containing ACMs.
- Any properties or areas of properties where we have not, or cannot access or inspect will be presumed to contain asbestos, unless there is strong evidence that it does not.
- Prior to any maintenance work being carried out on premises or materials presumed to contain ACMs, either sampling and analysis will be undertaken to confirm or refute the presence of ACMs or the work will need to involve appropriate contractors and work methods in compliance with the Control of Asbestos Regulations 2012.
- In practice this means that 100% of our stock that is considered as "at risk" of containing asbestos will be surveyed by a competent contractor.

4.1.2 We will also ensure that only suitably qualified surveyors are used for carrying out asbestos surveys. In addition to Blackwood's procurement requirements they must meet the following criteria;

- Accredited by UKAS to ISO 17020/ISO 17025
- The company must have a system for training and supervising its surveyors, and checking their knowledge.

4.1.3 Details of UKAS accredited companies can be found on the UKAS web site www.ukas.com

4.1.4 We will maintain a record of the type, location and condition of any ACMs found and assess the risks from such.

- We will do this by preparing and maintaining an asbestos register on our Universal Housing system. This will be kept by the Property Team and maintained by the Asbestos Manager. The register will contain details of all Blackwoods properties and the presence, type, location and known condition of any known ACMs, including a historic record of where ACMs have been repaired or removed. Full Management and Refurbishment Surveys will form part of this register.
- Where asbestos is suspected we will have it tested and either removed or managed in accordance with this document.

- For all identified ACMs the relevant asbestos survey will determine the level of risk based on the Material Assessment Score (MAS), taking into account factors such as maintenance activities, likelihood of disturbance and exposure potential. This will be recorded in the asbestos register along with details of any proposed corrective action.
- Existing ACMs, which are intact,, in good condition, not releasing dust, and not subject to abrasion or damage, will be left undisturbed. Details will be recorded in the asbestos register and subject to re-inspection on an annual basis by Estates/Asset Officers to ensure that the condition of the ACM has not changed.
- Existing ACMs which are damaged, deteriorating or inadequately sealed, will either be removed and replaced by suitable material not containing asbestos or resealed or encapsulated. Details will be recorded in the asbestos register. If resealed or encapsulated it will be subject to re-inspection at regular intervals (annually) to ensure that the condition of the ACMs has not changed.
- Only fully accredited and qualified ACM removal companies will be used for any removal works.
- Blackwood will review the asbestos assessment if we believe it is no longer valid, or in the event of a significant change to the premises where asbestos is known to exist.
- All work with asbestos will be carried out in accordance with current legislation, HSE guidance and best practices.

4.1.5 We will provide information on the type, location and condition of any ACMs to any contractors or others who may be in a position to disturb it, and;

- We will provide an extract of properties relevant to the works/project undertaken from the asbestos register to all prospective contractors at the pre tender stage.
- We will ensure that any works orders (repairs/supply instructions) given to a contractor contains information on any known ACMs, its location, condition and if it is likely to be disturbed. This will form part of any works order issued for reactive repairs. For out of hours emergency repair works, access to our asbestos register will be available to the out of hours contact centre.
- Where planned maintenance is due to be carried out in a property, a refurbishment survey will be carried out and the results made aware to the relevant contractor prior to any works starting on site. The refurbishment survey should be targeted to the area of works affected. Where a planned project involves a number of similar properties within a development, a minimum of 15% should have targeted refurbishment surveys carried out.

- We will ensure that information about known ACMs in our housing developments (both residential and common areas) is made available to customers. We will also ensure that information is made available to the Emergency Services in the event of an incident.
- When we sell or transfer any property, we will provide a copy of the asbestos management survey to the purchaser or their agent (if applicable).

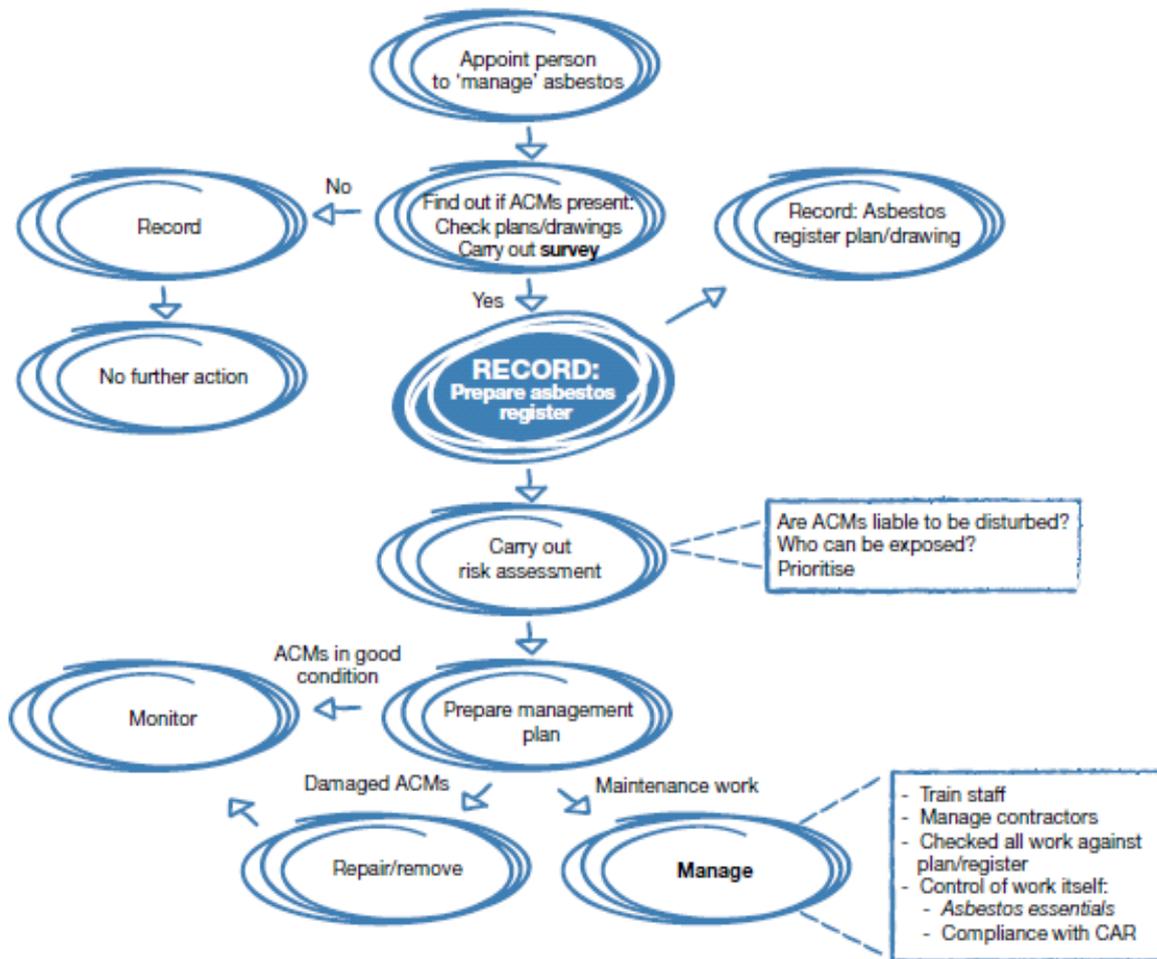
4.2 Inadvertant Exposure

- 4.2.1 If asbestos is discovered during works that was not identified by the management or refurbishment and demolition survey, the work must immediately cease and the Blackwood Asbestos Manager informed. The area must be evacuated and sealed and personnel prevented from entering area. In the absence of the Asbestos Manager, the Reactive Delivery Team Leader should be notified, followed by the most senior manager available at the time.
- 4.2.2 Specialist contractors will be contacted and they will then deal with the incident in the appropriate manner.
- 4.2.3 Where employees or contractors have received an inadvertent exposure to Asbestos, a record of the details, including the subsequent investigation, must be passed to Blackwood's Asbestos Manager who will inform the employees concerned. A copy shall also be passed to the Human Resources Team for recording on employee history file. This information will be kept for at least 40 years. See Appendix B for more information.

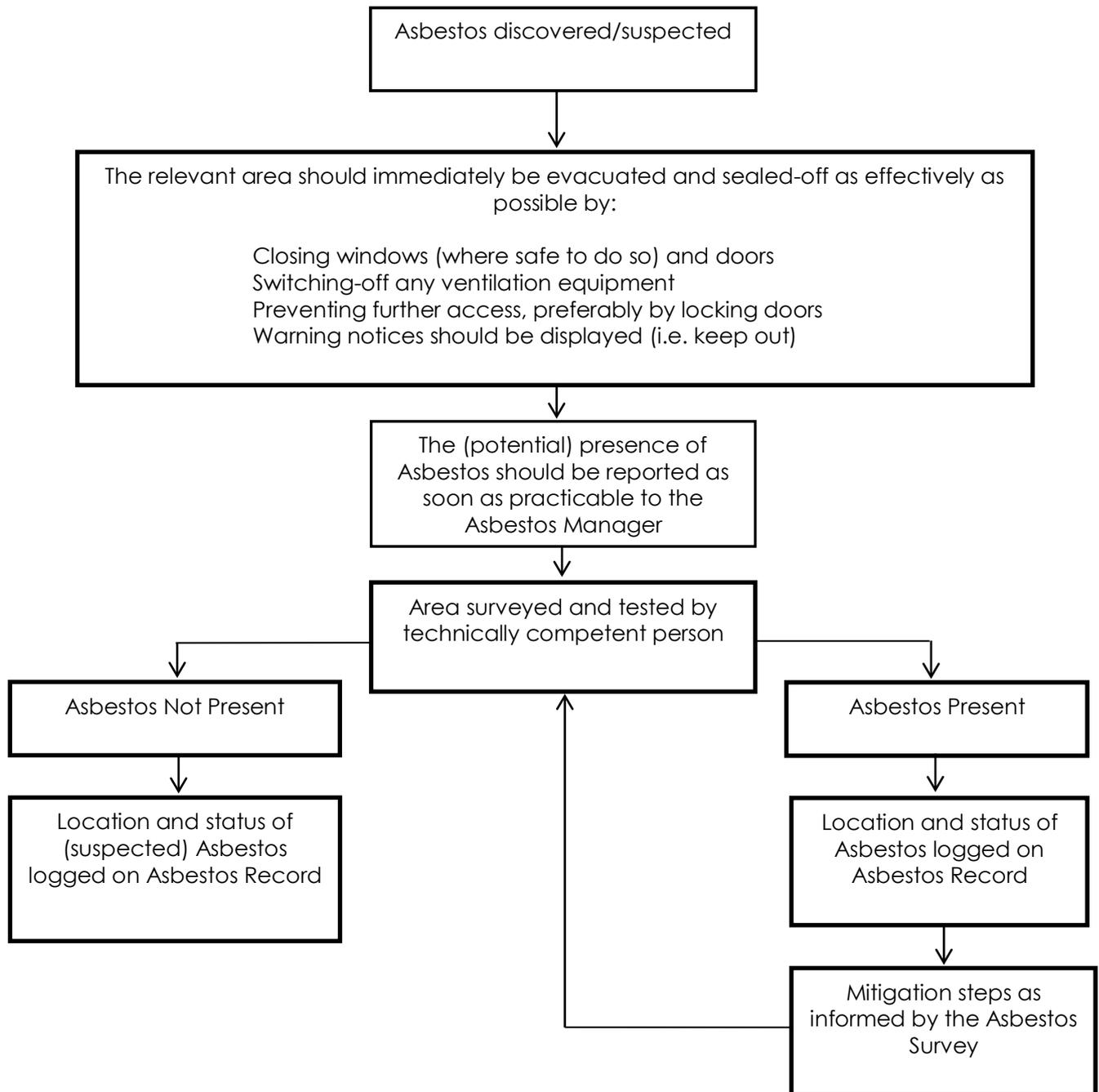
5. Monitoring and Review

- 5.1 This Policy will be reviewed 3 yearly and its continued effectiveness and implementation monitored by the Blackwood Health and Safety Advisor and Asbestos Manager.
- 5.2 The Asbestos Manager will also prepare an annual asbestos report, which will form part of the annual Assets Report and will include details on the number of properties known to contain asbestos, the number and types of surveys carried out and details of any asbestos removal or treatments. The report will also contain details of any plans/targets for the year ahead.

Appendix A - Summary of the main steps in managing asbestos (source HSE – HSG264)



Appendix B - Procedure if Asbestos discovered or suspected



NB: In the event of an incident that has resulted in loose debris or dust

Avoid all unnecessary disturbance of items in the vicinity (including personal belongings) where there is any reason to believe that these may be contaminated

Do not attempt to sweep, vacuum or remove any debris if the nature of the damaged material is not known. Where there is no electrical hazard, smaller damaged areas may be damped-down with a fine mist water spray, to which a little detergent has been added. Apply so as to allow the spray to “fall” onto the affected area. Wet paper towels may also be used to prevent any fibres being released to the air. Remember to post “Wet Floor” notices.

Where the contaminated area is within a designated **fire escape route**, additional contingency measures may be required, which will include a review of any fire risk assessment in place

Where there is a potential for contamination of people or their clothing (instances of significant damage or debris) **all persons** suspected of being contaminated shall (wherever practicable):

- Carefully remove outer layers of clothing (including footwear).
- Remove clothing by carefully turning inside out so as to avoid liberating any attached fibres.
- Wash down with damp towels or baby wipes. Have a shower where the facility exists.
- Ensure that the wash facility is thoroughly rinsed after use.
- All and any suspect items or contaminated clothing, and any used wipes, towels etc. are to be left altogether in the immediate vicinity of the incident – **preferably in a polythene bag.**

During normal office hours, it will usually be advisable to await further & detailed instruction from the Asbestos Manager. Employees should not leave or go home until instructed.

Arranging for a change of clothing will be an immediate priority.

All persons suspected of being contaminated should contact their GP.

The Human Resources Team should maintain records of any such incidents.