

ASBESTOS MANAGEMENT PLAN					
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## **Purpose and scope**

The Asbestos Management Plan (AMP) sets out Housing 21's Board approved policy and procedures for managing the risks from Asbestos Containing Materials (ACMs) throughout its portfolio of properties.

Some of the buildings owned or occupied by Housing 21 were built or refurbished at a time when the use of ACMs in their construction was common. This Plan is designed to effectively manage and minimise asbestos related health risks to staff and other persons working or occupying Housing 21 premises.

The presence of an ACM does not constitute a danger. However, there is a potential risk to health if such material is disturbed or 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 fire alarms, smoke detectors, IT systems.

Working with, and managing, ACMs is controlled by legislation, primarily the Control of Asbestos Regulations 2012 (CAR 2012). Other relevant legislation includes the Health and Safety at Work Act 1974 and the Management of Health and Safety at Work Regulations 1999.

## **Implementation**

The Asbestos Management Policy applies to all employees and there is a collective responsibility to prevent or minimise the risks to health and safety associated with asbestos management.

Housing 21 will appoint a Responsible Person, the Director of Property Services, who, as part of the role will have designated responsibility to ensure there are appropriate resources and systems in place to manage ACMs effectively. The Responsible Person will have specific overall responsibility for the upkeep and review of procedures and guidance that exist to support the effective implementation of the policy.

A full list of roles and responsibilities is detailed within the Asbestos Management Plan.

The organisation will hold an Asbestos Register which will hold records of the assets which have ACMs in them.

If employees become aware of problems with the effective operation of this policy or the procedures and guidance that support it, they should notify the Director of Property Services 'the Responsible Person' who will implement a review of the policy or supporting procedures and guidance.

## Abbreviations

ACM	Asbestos Containing Material
AMP	Asbestos Management Plan
AMS	Asbestos Management System (database)
CAR	Control of Asbestos Regulations 2012
HSE	Health & Safety Executive
UKAS	United Kingdom Accreditation Services
RIDDOR	Reporting of Injuries, Diseases and Dangerous Occurrences Regulations

## 1. POLICY STATEMENT

Housing 21 will manage asbestos in accordance with the relevant legislation and approved codes of practice to protect the health and safety of employees, residents, contractors, visitors, members of the public and other users of the buildings it owns and/or controls to minimise the risks posed by the disturbance of asbestos materials.

To ensure effective management of asbestos, Housing 21 will:

- Take reasonable steps to determine the location of materials likely to contain asbestos
- Presume materials to contain asbestos, unless there are good reasons not to do so, accepting that asbestos is likely to be present in most properties built prior to 2000.
- Keep and maintain an up-to-date record of the location, condition, maintenance and removal of all ACMs and presumed ACMs on the Asbestos Register.
- Share the above information as required with contractor and partner agencies.
- Assess, monitor, and maintain the condition of ACMs and presumed ACMs.
- Have arrangements and procedures in place, so that work which may disturb the materials complies with the Control of Asbestos Regulations 2012 (CAR)
- Assess the risk of exposure from ACMs and presumed ACMS and prepare a written plan for each court or property of the actions and measures necessary to manage the risk.

- Review the plan every twelve months and update if circumstances change or because of any significant procedural or legislative changes.
- Develop and maintain a managed programme of asbestos surveys in all our courts
- Minimise exposure to the uncontrolled disturbance of ACMs using appropriate control measures and working methods, as far as is reasonably practical.
- Where possible and risks of airborne asbestos fibres are negligible, Housing 21 will deal with ACMs in situ through effective management and control measures as a preference to whole-scale removal and disposal.

## 2. STATEMENT OF INTENT

The purpose of this Asbestos Management Plan is to set out the mechanism, roles, and responsibilities by which ACMs are to be managed. It includes details on how the organisation intends to:

- Demonstrate Housing 21's commitment to comply with the Control of Asbestos Regulations
- Clearly identify the responsibilities of the duty holder and appointed competent persons
- Detail the mechanism by which the organisation shall prevent the exposure of employees, residents and others to asbestos and prevent the spread of asbestos to the lowest levels reasonably practicable.

This shall include:

- Identify all ACMs and manage associated hazards based on assessment of the risk they present and prioritisation of action
- Effective control of any work or activity likely to affect ACMs by project
- Monitor and maintain ACMs in good condition where it is assessed as being safe to leave them in situ
- Respond to and manage any emergencies involving ACMs
- Procedures when undertaking operation and maintenance work
- Procedures when undertaking planned and reactive project work
- Maintaining an effective AMS and AMP
- A robust process for the management of immediately dangerous situations identified from any asbestos-related works undertaken on Housing21 properties.

## 3. LEGAL FRAMEWORK

Whilst the AMP is intended to comply with all aspects of the requirements of CAR 2012 and other relevant legislation, the following duties within CAR 2012 are expressly highlighted as

being fundamental to the success of the organisations effective asbestos management system, that underpin this Plan:

Regulation 4 requires Duty Holders to:

- Find ACMs and check their condition
- Presume that materials contain asbestos unless there is strong evidence to suppose they do not
- Keep an up-to-date written record of the location and condition of ACMs
- Assess the risk of anyone being exposed to these materials
- Prepare and put into effect a management plan to manage the risk and keep ACMs in a good state of repair, or ensure that it is repaired or if necessary, removed
- Provide information on the location and condition of the material to anyone potentially at risk

Regulation 5 - Identification of the presence of asbestos states:

- An employer shall not undertake work in demolition, maintenance, or any other work which exposes or is liable to expose his employees to asbestos unless either: -
  - They have carried out a suitable and sufficient assessment as to whether asbestos is likely to be present
  - If there is doubt, assumes that asbestos is present

Regulation 11 requires employers to:

- Ensure that adequate information, instruction, and training is given to employees who are liable to disturb asbestos while carrying out their normal everyday work, or who may influence how work is carried out.

#### **4. SCOPE OF BUILDINGS**

Where Housing 21 owns/controls or maintains the building fabric they are the duty holder for ensuring compliance with CAR 2012.

Buildings outside the scope for the organisation as the Duty Holder include leasehold/tenanted buildings where the organisation does not have maintenance or repair obligations for the building fabric or building engineering services/infrastructure under the lease agreement.

As the organisation has employees, residents and contractors using these buildings there is a duty of care to ensure that the duty holder in those buildings has an adequate process in place for complying with the CAR 2012 and any ACM information is available for review by the organisation.

A comprehensive list of buildings where the organisation is the Duty Holder can be obtained from the Asset Management Team.

## 5. IDENTIFYING ASBESTOS CONTAINING MATERIALS (ACMs)

In accordance with HSG264 'Asbestos the Survey Guide' Housing 21 will carry out:

- **Management Surveys**

Designed to locate, as far as reasonably practicable, the presence and extent of any suspected ACMs in buildings owned and/or controlled by Housing 21 which could be damaged or disturbed during normal occupancy, including foreseeable maintenance and installation and assess their condition.

- **Refurbishment Survey with localised 'back-to-brick'**

Intended to be undertaken prior to any capital works. The survey will involve penetrations into the ceiling each wall and all floor coverings within the bathroom/kitchen areas that is within that property's scope for refurbishment.

- **Refurbishment and Demolition Survey**

Intended to be completed before any refurbishment or demolition work is carried out. This survey will be used to locate as far as reasonably practicable the presence of ACM's, will be fully intrusive and as necessary may involve destructive inspection.

### 5.1 Management Surveys

Housing 21 has carried out management surveys to all communal areas of our courts and a representative sample of the domestic properties within and implemented remedial works as recommended.

Following the initial management survey in communal areas of our properties, condition re-inspections will only be carried out where the previous survey results identify ACMs which are to be left in situ (including presumed) or there are significant changes to the property in accordance with CAR 2012.

Where maintenance or more extensive void works are required that involve disruption to the fabric of the building Housing 21 will carry out a refurbishment survey unless the area has an existing and valid survey in place (see below).

Management surveys are usually non-intrusive and involve minimal disturbance to residents or users of the building. Where a management survey causes any damage to a resident's property or minor intrusive works are required Housing 21 will carry out remedial works as necessary.

The results of any scheduled or ad hoc management surveys will be recorded in the asbestos register/database and will inform the Asbestos Management Plan.

## 5.2 Refurbishment Surveys with localised 'back-to-brick'

Appropriate refurbishment surveys will be conducted when 'back to brick' renovations are required to properties. This may include full depth penetrations to the structural components of the affected parts of the property to establish any existence of ACM's that may be hidden beyond surface layers.

## 5.3 Refurbishment and Demolition Surveys

Where Housing 21 intends to carry out refurbishment or demolition works to properties it owns or manages, we will ensure a refurbishment survey is carried out to the parts of the property due to be affected by the works. This will include taking intrusions through each layer of construction to its foundation (i.e., concrete floor, brick or roof including ceiling).

Where refurbishment works (demolitions or capital works) to elements of properties (and to similar property types) a representative sample of surveys will be carried out to provide assurance, as far as is reasonably practicable, of the consistency and range of ACMs in each property type.

Due to the intrusive and destructive nature of refurbishment surveys, all necessary precautions will be taken to ensure that no person is exposed to airborne asbestos fibres because of survey works. Housing 21 will, as required:

- Isolate survey areas (e.g., full floor to ceiling partitions) and power/gas isolations
- Remove or protect furnishings
- Ensure only those persons qualified and required to carry out the survey are present when it takes place. Where necessary, Housing 21 will assist vulnerable residents or those who would have difficulty in making their own arrangements, to find alternative facilities during the period of the survey works.
- Carry out remedial works and, if appropriate, in cases of significant disturbance, seek assurances that areas are safe to reoccupy through thorough cleaning and or air sampling.

Where destructive works are required because of an emergency, and this can be achieved without further risk to the health and safety of individuals, a refurbishment survey will be carried out prior to works commencing. In all circumstances Housing 21 will endeavour to ensure that contractors carrying out emergency works are provided with the most up to date asbestos survey.

## **6. ROLES AND RESPONSIBILITIES (ref. Chart 1)**

All Housing 21 employees must follow the Asbestos Management Plan/Policy and take responsibility for the management of asbestos.

### **6.1 The Board**

The Board will have overall governance responsibility for ensuring the asbestos policy is fully implemented to ensure full compliance with regulatory standards, legislation, and approved codes of practice. The Board will formally approve this policy and review it every three years (or sooner if there is a change in regulation, legislation, or codes of practice).

The Board will receive regular updates on the implementation of this policy and asbestos compliance performance, together with notification of any non-compliance issues identified.

### **6.2 Executive Management Team**

The Executive Management Team (EMT) will receive reports on the asbestos management plan/performance and ensure compliance is being achieved, together with notification of any non-compliance issues identified.

### **6.3 Deputy Chief Executive**

The Deputy Chief Executive is responsible for:

- Ensuring compliance with the Asbestos Management Plan and Policy
- Implementing and monitoring the overall strategy for the safe execution of asbestos related issues

### **6.4 Director of Property Services – Responsible Person**

The Director of Property Services reports to the Deputy Chief Executive and is the named 'Responsible Person', with responsibility for:

- Executing the principal functions of asbestos management plan
- Regularly reviewing strategic asbestos management issues and progress against asbestos related actions
- Allocating appropriate resources to ensure appropriate management of asbestos related issues

- Ensuring relevant staff have received suitable and sufficient training in asbestos management
- Ensuring continued compliance with relevant legislation concerning asbestos

### **6.5 Head of Technical Services – Deputy Responsible Person**

The Head of Technical Services reports to the Director of Property Services and is the 'Deputy Responsible Person' responsible for:

- Coordinating operational requirements specified within the Asbestos Management Plan, including monitoring and inspections, labelling, encapsulation, and asbestos removal.
- Ensuring that the Asbestos Register(s) are kept up to date
- overseeing the delivery of the agreed survey inspection programmes; and
- the prioritisation and implementation of any works arising from the surveys
- co-ordinating reinspection of all identified or presumed ACMs in common areas and non-domestic premises on an annual basis
- coordinating actions required in an asbestos related emergency
- assessing, revising, and recommending management actions considering re-inspection findings and changes in legislation and good practice

### **6.6 Head of Property Investment – Deputy Responsible Person**

The Head of Property Investment reports to the Director of Property Services and is the 'Deputy Responsible Person' responsible for:

- prior to commencement of works, ensuring that contractors and consultants are advised of ACMs affecting proposed works, referring them to the site-specific Asbestos Register
- Prior to any refurbishment/modification works, coordinating assessment of the areas prior to the start of the works to identify any known risks from asbestos.
- Consulting the Asbestos Register for the site and ensuring a Refurbishment and Demolition Survey is undertaken as appropriate.
- Informing contractors of the location of any known asbestos affecting a project.

**6.7 Health and Safety Manager** is responsible for ensuring the policy is reviewed every three years, or sooner if legislation changes, and assurance is received from our Primary Authority, South Cambridgeshire District Council prior to approval of the Board.

**6.8 Housing Management** employees are responsible for:

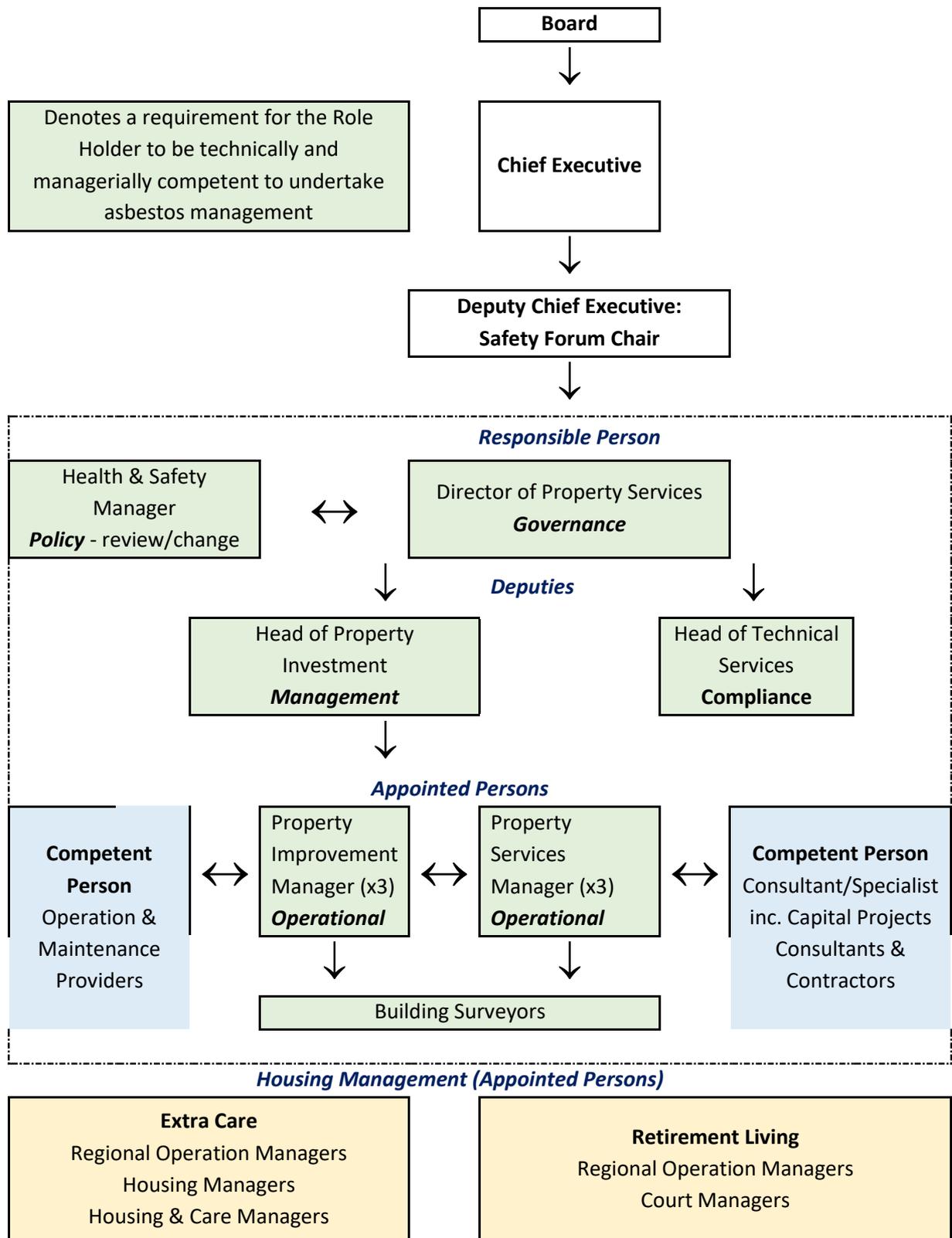
Ensuring they are familiar with the Asbestos Register for their building and be able to provide the Asbestos Register to any relevant party without delay.

Verifying that all contractors attending a site to undertake any work are aware of all relevant asbestos information for the area of their planned work. Where a contractor is not aware of relevant asbestos information relating to their activity, they should not be allowed in the property to undertake work and should be referred to the on-site asbestos report.

Not allow any work or activity of any kind that could result in the damage or disturbance of a known or suspected ACM and to ensure all contractors have signed the contractor's declaration sheet prior to undertaking any work within the property (see supporting guidance note).

Ensure that known/suspected ACMs condition is monitored and report any damage/deterioration to ACM's immediately to the Technical Surveyor/Building Safety Manager.

Chart 1.



## 7. TRAINING

Housing 21 will provide asbestos awareness training in accordance with the Health and Safety Executive's approved code of practice to all employees - technical and construction whose work might bring them into contact with ACMs.

To ensure ACMs are properly managed a 'Responsible Person' and Appointed Persons will be employed with day-to-day management responsibility for overseeing asbestos management and survey processes and maintenance of the asbestos register (Refer to Roles and Responsibilities).

The Responsible Person and any appointed persons will be able to demonstrate competence in the role by obtaining qualifications commensurate with their role e.g., British Occupational Hygiene Society P405 qualification for 'Management of Asbestos in Buildings' and have sufficient practical experience to carry out the role effectively.

## 8. RECORD KEEPING

8.1 Housing 21 will maintain an Asbestos Register (as required by CAR 2012) against each property. The register will contain information on the precise location and nature of ACMs, the date they were last inspected and their condition at the time. The register will also contain information on the planned dates for re-inspection based on the following intervals:

- Non-domestic premises: No more than 12-month intervals
- Communal: No more than 12-month intervals

8.2 Housing 21 will ensure that all data relating to asbestos in the properties it owns and manages will be held securely i.e., only those with specific responsibility for updating the asbestos register will be able to make alterations. The information on the extent and condition of ACMs within properties will be updated when:

- A new or re-inspection survey takes place (including those that result from emergency repair action)
- When remedial actions are taken to maintain the condition of known ACMs
- When ACMs are removed from properties (by special licensed contractors)

8.3 All Housing 21 employees and contractors acting on Housing 21's behalf will have access to existing survey data in properties. Where no survey data exists, the presumption will be that there are ACMs present and operatives, and contractors should proceed with any works with the appropriate level of caution.

8.4 Where routine inspection, ad-hoc inspection or other maintenance activities prompt action that requires removal of licenced and/or notifiable ACMs, Housing 21's contractors will inform the appropriate enforcing authority (Local Authority Environmental Health or the Health and Safety Executive) using the appropriate notification channels and documentation.

- 8.5 Housing 21 will implement a robust process to deal with all changes to stock, including new property acquisitions, disposals, and stock transfers, to ensure that properties are not omitted from the compliance programme, and to ensure the programme remains up-to date.

## 9. RESIDENT INFORMATION

Housing 21 will provide information to residents regarding asbestos-containing materials and will ensure that residents are able to access the asbestos management survey if required.

Where a routine inspection, management survey or refurbishment survey (see section 5.) indicates remedial action is required and/or there is a possibility of occupants being exposed to airborne dusts from the ACM, residents will be advised on the nature of this action, the reasons why it is needed and the likely timescales for work to commence and be completed.

## 10. USE OF COMPETENT CONTRACTORS

Housing 21 will employ competent external contractors (in line with HSG264) to undertake asbestos management surveys. Licensed asbestos removal operatives and/or contractors will be employed to undertake licensed remediation works (where necessary) to non-domestic (communal blocks/'other' properties) and domestic properties.

- Housing 21 will employ suitably competent persons to undertake asbestos reinspection and the removal of non-licensed asbestos.
- Where asbestos needs to be removed from properties owned or managed by Housing 21 a full risk assessment will be undertaken and any on-site works carried out by specialist licensed contractors.
- Housing 21 will ensure that all contractors it employs to carry out asbestos works including, surveying, analysis and removal meet the required criteria and have appropriate accreditations through its procurement and preferred supplier checks.
- Housing 21 will ensure that all contractors' employee and public liability insurances are up to date on an annual basis.
- Housing 21 will ensure contracts/service level agreements are in place with the contractors responsible for delivering the compliance service.
- Housing 21 will ensure there are effective contract management arrangements in place, in the form of client-led meetings taking place regularly, with standard agendas and minutes produced, key performance indicators analysed and programmes and performance scrutinised

## 11. LEGISLATION AND REGULATIONS

The application of this document ensures that Housing 21 meets its legal requirements in the management of ACM's. These include:

Control of Asbestos Regulations 2012	The Regulations give minimum standards for protecting employees from risks associated with exposure to asbestos.
Health and Safety at Work etc. Act 1974	Protects employees or workers. It aims to minimize the risk involved at a workplace and looks after the welfare of the people working.
The Management of Health and Safety at Work Regulations 1999	Places a duty on employers to assess and manage risks to their employees and others arising from work activities.
Control of Substances Hazardous to Health (COSHH) Regulations (as amended) 2002	Requires employers to control substances that are hazardous to health and includes nanomaterials.
Personal Protective Equipment (PPE) at Work Regulations 1992 (amended 2022)	PPE is equipment that will protect the user against health or safety risks at work.
Construction (Design and Management) Regulations 2015	Managing the health, safety, and welfare of construction projects. CDM applies to all building and construction work and includes new build, demolition, refurbishment, extensions, conversions, repair, and maintenance.
Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) 2013	Places a duty to report certain serious workplace accidents, occupational diseases and specified dangerous occurrences (near misses)
Defective Premises Act 1972	Imposes duties on builders and developers to conduct work safely and in accordance with strict criteria governing the same.
Landlord and Tenant Act 1985	Introduced minimum standards that a landlord owes to their tenants.
Homes (Fitness for Human Habitation) Act 2018	Amends the Landlord and Tenant Act 1985 to require that residential rented accommodation is provided and maintained in a state of fitness for human habitation; and for connected purposes.
Housing Health and Safety Rating System 2005	A risk-based evaluation tool to help local authorities identify and protect against potential risks and hazards to health and safety from any deficiencies identified in dwellings.

<b>Health and Safety Guidance (HSG)</b>	
HSG 264	Asbestos the Survey Guide
HSG L143	Managing and working with asbestos
HSG 248	Asbestos: The analysts guide for sampling, analysis and clearance procedures
HSG 247	Asbestos: The licensed contractors guide
HSG 227	A comprehensive guide to managing asbestos in premises
HSG 210	Asbestos Essentials: A task manual for building, maintenance and allied trades and non-licenses asbestos

## 12. CONSULTATION

- 12.1 Housing 21's Health and Safety Forum and Policy Steering Group have been consulted about the development of this Policy.
- 12.2 Specific input of technical advice has been sought from Housing 21 employees with operational knowledge of asbestos management (ref. section 6)
- 12.3 Housing 21's Primary Authority, South Cambridgeshire District Council, Environmental Health have been consulted and have approved the final Policy.

## 13. RESPECT AND INCLUSION

- 13.1 Housing 21 aspire to embed diversity and including within all our organisational activities to enable these principles to become part of our everyday processes.
- 13.2 If any factors arise that warrant consideration based on these grounds, the association will look at the issue and its priority.

## 14. SAFEGUARDING

If a contractor needs to raise a safeguarding issue this should be emailed directly to the Safeguarding Team at Housing 21: [safeguarding@housing21.org.uk](mailto:safeguarding@housing21.org.uk)

## 15. EQUALITY IMPACT ASSESSMENT

A full Equality Impact Assessment (EIA) has been completed by the Director of Property Services and the Health and Safety Manager.