



EASTHALL PARK

Asbestos Policy (Asbestos Management)

Date of Current Review	November 2019
Date of Next Review	November 2022
Reviewed By	Management Committee

CORPORATE FIT	
Strategic Plan	
Risk Register	✓
Regulatory Standards	✓
Equalities Strategy	
Legislation	✓

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1. Introduction

- 1.1 Easthall Park Housing Co-operative operates a Health and Safety Management System, which comprises a broad range of documented policies, procedures and arrangements for the effective control of risks to the health, safety and welfare of employees and others who may be affected by the organisation's undertakings.
- 1.2 This document forms part of the overall Management System and sets out the organisation's specific arrangements for the management of asbestos.
- 1.3 This policy is intended to ensure that Easthall Park complies with the asbestos related duties laid out in the Control of Asbestos Regulations 2012.
- 1.4 Easthall Park currently has 695 properties. The stock is a mix of tenements and houses. A limited number of these buildings were built or fully refurbished at a time when the use of asbestos containing materials (ACM's) was permitted. During work on these buildings it is therefore possible that personnel could disturb asbestos containing materials.
- 1.5 This policy applies to the entire property portfolio under the control of Easthall Park and to all operations carried on under its control without exception.

2. ASBESTOS RISK

- 2.1 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 can present a risk as 'cumulative exposure' develops over time.
- 2.2 Easthall Park's stock contains a relatively low number of properties with potential ACMs, and it is considered that there is a low risk of exposure to employees, service users, contractors and the general public. Nevertheless, the Co-operative will comply fully with the responsibilities laid out by law.
- 2.3 In developing this policy, consideration was taken of the legislative requirements and good practice set out in the following documents:
 - Health and Safety at Work Act etc. 1974;
 - Management of Health and Safety at Work Regulations 1999;
 - Control of Asbestos Regulations 2012 (CAR12) – HSE Document L143 Regulations, Approved Code of Practice and Guidance;
 - HSE Guidance INDG 223 A Short Guide to Managing Asbestos in Premises;
 - HSE Guidance HSG264 Asbestos: A survey guide, and
 - HSE Guidance HSG227 Managing Asbestos in Premises.

3. DUTY TO MANAGE ASBESTOS

- 3.1 The Co-operative recognises the duty imposed by Regulation 4 of CAR12 to 'manage' asbestos risks. In particular, the following duties set out in HSG264 in respect of routine management, refurbishment and demolition work of premises. Those are to:

- 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;
- make and maintain a written record of the location of the ACMs and presumed ACMs;
- assess and monitor the condition of ACMs and presumed ACMs;
- assess the risk of exposure from ACMs and presumed ACMs and prepare a written plan of the actions and measures necessary to manage the risk (i.e. the 'management plan'); and
- take steps to see that these actions are carried out.

3.2 To ensure compliance with this duty specific roles and responsibilities have been defined and all personnel who are responsible for the management of asbestos are deemed competent to perform their duties. That is, to ensure that all asbestos containing materials are addressed, assessed and managed.

4. ROLES AND RESPONSIBILITIES

4.1 Management Committee

4.1.1 The Management Committee is collectively responsible for providing leadership and direction on Health and Safety.

4.1.2 The Committee will give due consideration to reports in relation to Easthall Park's asbestos risk management and/or compliance with the Asbestos Management System as required.

4.1.3 The Committee will be presented with the findings of internal and external asbestos reviews and implement recommendations that remove significant risks to the business as required.

4.2 Employees

4.2.1 While the Director will hold ultimate accountability and responsibility for the development and implementation of this policy, all persons employed by the Co-operative have a responsibility and will:

- Ensure that any work that may disturb or damage known asbestos containing materials is avoided;
- Prevent any work on or intentional damage to building fabrics unless advice on the asbestos risk has been obtained, and
- Reporting any materials suspected of containing asbestos, where the material has become disturbed and/or damaged.

4.3.2 Specific responsibilities and associated actions in relation to works carried out by Easthall Park are laid out in Easthall Park's Asbestos Management Procedures.

4.3 General Contractors and Sub-Contractors (non-asbestos)

4.3.1 All contractors will be required to:

- Ensure and demonstrate that they and their staff are fully familiar and comply with current legislation relating to the management of asbestos containing materials;
- Consult with any relevant asbestos registers / survey reports that may be available for establishments **prior to** work progressing
- Ensure that any relevant risk assessments, method statements, statutory notices are in place (and adequately referencing asbestos risk) before work commences;
- Progress all works diligently and, if any suspect materials are encountered, to immediately suspend operations and to contact the relevant member of staff for further instruction, and
- ensure that asbestos sub-contractors are approved and registered by the appropriate authorities, such as HSE and have the relevant documentation and certification which allows for works to be carried out safely whilst adhering to all legal responsibilities

4.4 Asbestos Removal Contractors and Sub-Contractors

4.4.1 All appointed licensed and insured asbestos removal / remediation contractors (UKAS Accredited) will be responsible for:

- Ensuring their working practises comply with current legislation and all associated approved codes of practice and guidance notes, and
- Carrying out their obligations under the contract (including maintaining high standards of safety and hygiene in asbestos works; supplying labour, materials and equipment of the highest standard, complete with all supporting documentation; Arranging disposal of asbestos waste materials in accordance with legislative requirements and providing copies of all documentation to Easthall Park if applicable).

4.5 Asbestos Analysts and Surveyors

4.5.1 Easthall Park Housing Co-operative will engage with approved and insured asbestos analysts, surveyors and consultants as required. They will provide assistance with:

- Reviewing and commenting on asbestos works such as: specifications, contractor's and/or sub contractor's method statement, work procedures, completions, etc;
- Carrying out analytical works and inspections as agreed;
- Reporting any defect or non-compliance relating to the contractor's and/or sub contractor's performance in relation to asbestos management;
- Periodically checking areas on completion of asbestos remedial works to ensure that the contractor has completed the scope of works and all affected areas have been left in a satisfactory condition;
- Carrying out air monitoring tests as may be required, and
- Reporting any aspects of asbestos management encountered on site which could give rise to health risks.

5. Competence – Information, Instruction and Training

- 5.1 Easthall Park will be responsible for ensuring relevant employees are provided with the appropriate training and records will be maintained of all training provided.

6. Document Control

- 6.1 The Asbestos Management relies upon a range of documentation. The following summarises the principal components of the system:

- Asbestos Register
- Survey Reports Folder
- Policy and Procedures Document
- Asset Register – incorporating property list / relevant premises
- Asbestos Contractors and Consultants List
- Applicable Training Records
- Incident Records
- Asbestos Works Records

7. Review

- 7.1 The Asbestos Policy will be reviewed at 3-year intervals or sooner if current legislation changes.
- 7.2 The review will take account of policies and procedures, asbestos register, training records and all records associated with asbestos works.
- 7.3 A report will be prepared detailing the findings of any review, highlighting areas for improvement and making recommendations and suggestions.

8. Continual Improvement

- 8.1 The Co-operative is committed to achieving continual improvement in the management of risk associated with asbestos. This will involve the regular review of the policy and procedures and the introduction of additional controls where knowledge or technology on the subject develops and as the risk assessment, monitoring and control schemes dictate.

9. Freedom of Information

- 9.1 This policy and associated procedures will be made available for download from the Easthall Park website, as part of our Guide to Information.
- 9.2 On request, Easthall Park will provide translations of all our documents, policies and procedures in various languages and other formats such as computer disc or memory stick, tape, large print, Braille, etc and these can be obtained by contacting the office.

10. Equalities Impact Assessment

- 10.1 Our Asbestos Management Policy complies with our commitment to ensuring equality of treatment for all tenants and residents without discrimination or prejudice. We will treat all customers equally and fairly, regardless of sex, faith or religion, race, ethnic origin, sexual orientation, mental or physical health, disability or marital status.

11. Review

- 11.1 Our Asbestos Management Policy will be reviewed on a 3 yearly cycle or earlier if required.