

# EastendHomes Asbestos Policy

# **CONTENTS**

- 1. INTRODUCTION**
- 2. STATEMENT OF INTENT**
- 3. ROLES AND RESPONSIBILITIES**
- 4. ASBESTOS SURVEYS, RECORDS AND ASBESTOS REGISTER**
- 5. KEY PERFORMANCE INDICATORS**
- 6. RISK ASSESSMENT**
- 7. INFORMATION**
- 8. SELECTION AND MONITORING OF SPECIALIST CONTRACTORS FOR THE TREATMENT AND REMOVAL OF ASBESTOS CONTAINING MATERIALS**
- 9. PROTOCOLS FOR WORK WITH ASBESTOS MATERIAL**
- 10. ASBESTOS ADVICE AND GUIDANCE**
- 11. ARRANGMENTS FOR ASBESTOS EMERGENCIES**
- 12. INSTRUCTION AND TRAINING**
- 13. HEALTH SURVEILLANCE**
- 14. STAFF CONSULTATION**

## **APPENDIX: 1**

**ASBESTOS INSPECTION REQUEST FORM**

## **APPENDIX 2:**

**FURTHER REFERENCES**

## **APPENDIX 3:**

**ASBESTOS RELATED INCIDENT REPORTING FORM**

## **1. INTRODUCTION**

- 1.1 The main aim of this policy is to ensure that any asbestos located within EastendHomes housing stock is managed in accordance with relevant legislation. There will also be a requirement on contractors to demonstrate that all staff have sufficient knowledge to recognise asbestos if they encounter it.
- 1.2 This policy applies to all buildings either owned, leased or managed by EastendHomes.
- 1.3 The specific objectives of the Asbestos Policy are:
  - 1.3.1 To take steps to locate any asbestos containing material in our premises and assess the condition;
  - 1.3.2 To prepare records of the location and condition of all asbestos containing materials and assess the risk from them;
  - 1.3.3 To provide information and advice on the location, type and condition of the material to anyone who could be in a position to disturb it;
  - 1.3.4 To ensure that all residents and contractors working in tenants homes clearly understand the risks involved in disturbing asbestos containing materials; and
  - 1.3.5 To take all reasonably practicable steps to prevent its employees and others from breathing in asbestos fibres.
- 1.4 The principles underpinning the EastendHomes Asbestos Policy are:
  - 1.4.1 EastendHomes will ensure that the Asbestos Policy complies with and reflects the current legislation and good practice;
  - 1.4.2 EastendHomes will work in an inclusive way to enable implementation of this policy;
  - 1.4.3 EastendHomes will implement detailed procedures and agreed practices uniformly across the service;
  - 1.4.4 The policy will be supported by staff training to ensure all staff are equipped to carry out the roles expected of them.

## **2. STATEMENT OF INTENT**

- 2.1 EastendHomes will, so as far as reasonably practicable, ensure that suitable arrangements are in place to control the risk to its employees, appointed contractors, residents and members of the public arising from the uncontrolled release of asbestos fibres within or from any building under the EastendHomes control. So far as practical, EastendHomes are committed to ensuring that all asbestos containing materials in buildings owned or leased by EastendHomes will be maintained in safe condition. Please also refer to the EastendHomes Asbestos Advice and Guidance : The Treatment and Removal of Asbestos Containing Materials and other Guidance notes on asbestos containing materials.
- 2.2 EastendHomes will ensure that no asbestos containing material is introduced, used or specified in any works undertaken within EastendHomes managed premises or works undertaken on behalf of EastendHomes.
- 2.3 EastendHomes will ensure that its relevant staff, including Architects, Engineers, Surveyors, Technical Staff etc. and Officers–in-Control of Premises (Facilities and Premises Managers etc.) and other persons involved in the raising of maintenance or repair works orders which specify construction/ maintenance works are fully aware and understand this policy document. Furthermore, that those staff will attend appropriate training in the risks associated with asbestos containing materials and the likely locations where such materials are found. Such training will also be required for repairs contractors and their appointed sub-contractors.
- 2.4 EastendHomes will ensure that all work involving asbestos containing materials is undertaken by competent Licensed Contractors, in accordance with the requirements of the Control of Asbestos at Work Regulations 2006, other relevant legislation and codes of safe working practice. This will be achieved by ensuring that all contractors who work with asbestos containing materials are assessed for health and safety competency.
- 2.5 EastendHomes Contractors must ensure that they notify EastendHomes' Technical Services of the details of any sub-contractors whom they wish to employ to carry out repair/maintenance works within EastendHomes premises. EastendHomes Technical Services must satisfy themselves with the competency of sub-contractors.

## **3 ROLES AND RESPONSIBILITIES**

### *3.1 The Board*

The Board will ensure that the Chief Executive and SMT produce an effective Health and Safety Policy and management system. The Board has overall responsibility for the organisation's management, including Health and Safety and is committed to the highest standards of Health and Safety. The Board will ensure that all our staff have:

- A safe place of work
- Safe systems of work
- Information
- Instruction

- Training
- Supervision

The Board will ensure that Health and Safety is always considered as part of the decision making process.

Protecting the health and safety of staff, residents, customers and members of the public who may be affected by our activities will be an essential part of our risk management process. The determination of significant risks will lie with the Board through an annual Risk Mapping process. Board Members will receive regular updates on the status of identified risks and their mitigating controls.

### 3.2 *Directors*

The Directors are accountable to the CE for ensuring that Health and Safety management systems are in place within their sphere of responsibility.

The Directors will ensure that their staff are aware of and fully comply with their Health and Safety responsibilities and that all managers implement and monitor the performance of their staff addressing any issues in a timely manner. Directors will incorporate Health and Safety into service planning including targets to continuously improve Health and Safety performance.

Directors will ensure that any consultants, contractors or staff appointed are fully aware and briefed on their Health and Safety responsibilities.

### 3.3 *Head of Service with responsibilities for Health and Safety*

The implementation of this Policy is the responsibility of The Head of Asset Management who has been nominated by the Chief Executive to co-ordinate the Health, Safety and Risk Management systems within the organisation with particular emphasis on communicating Health and Safety information.

### 3.4 *Line Management*

All managers and supervisors will support the Health and Safety of their staff by ensuring that they have access to relevant information, training and instruction. Failure to comply with Risk Assessment controls will be addressed through management action.

Managers will apply the planning and delivery of Health and Safety requirements based on the control measures identified through Risk Assessments. Relevant staff will be involved in assessing risk and particular attention will be paid to managing all significant hazards, ensuring that control measures are suitable and sufficient.

New staff induction will include a review of relevant Risk Assessments, control measures and working procedures applicable to the job role. Mandatory training on Health and Safety relevant to the job role will be identified and delivered on a rolling programme. Additional Health and Safety or other training may be identified through the performance management process and will be reviewed annually to develop the

training programme. Risk Assessments will be undertaken and brought to the attention of staff and suitably recorded. Staff will have work place access to relevant Risk Assessments either via hard copies or the shared IT drive.

Managers will ensure all plant, workplace equipment and personal protective equipment provided is 'fit for purpose'. Staff will be trained in its effective use and it will be regularly inspected and maintained by a competent person, who will retain records of inspections.

Managers will ensure that Health and Safety features as a standard agenda item at every team meeting and that any urgent issues identified which were not immediately resolvable are referred to the Health and Safety Advisor. All referrals will be reviewed by the Health and Safety Working Party to ensure that an appropriate response has been delivered.

#### **4. ASBESTOS SURVEYS, RECORDS AND ASBESTOS REGISTERS**

- 4.1 EastendHomes will continue its planned programme to survey and identify the location of asbestos in its premises and facilities, including the communal areas of residential blocks. EastendHomes Technical Services will be responsible for the collation of asbestos survey information and its subsequent dissemination to their appointed contractors and staff.
- 4.2 The results of the Asbestos surveys will be entered into the EastendHomes Asbestos Register. This information will then be available electronically on EastendHomes' servers and also on hard copy or removable electronic format.
- 4.3 Staff in control of premises are responsible for ensuring that asbestos survey information is passed to contractors prior to any building works being commenced that could disturb or damage asbestos containing materials and result in fibres being released.
- 4.4 EastendHomes are responsible for ensuring that tenants/ leaseholders are notified of the presence and location of asbestos containing materials in their property and this will normally be achieved via a letter of notification.
- 4.5 Asbestos survey information will be treated as 'controlled records' and will be updated frequently.
- 4.6 Similar controls will be put in place for the dissemination of survey information to EastendHomes' contractors.
- 4.7 Asbestos survey information will be held on the EastendHomes 'J' networked drive, on a database. EastendHomes job tickets include a flag either stating 'no asbestos' or advising the contractor to check the asbestos database. Presently asbestos ACM information is given to contractors twice a year on a disc but is printed in-house for each handyman ticket.

4.8 It is the responsibility of the relevant contractor to ensure that the asbestos information is available to all attending operatives, and that any necessary control mechanisms have been put in place.

4.9 EastendHomes' appointed specialist asbestos contractors will be responsible for providing updated asbestos information (reports and test results) for incorporation into the EastendHomes database

**5. KEY PERFORMANCE INDICATORS (KPIs)**

5.1 Performance of Asbestos Management will be reviewed at the quarterly Health and Safety meetings. Performance targets for review include:

	<b>Key Performance Indicators ( KPI )</b>	<b>Target</b>
1	Percentage of blocks with primary and secondary Asbestos surveys.	70 %
2	Occupied premises with annual condition survey of known Asbestos.	5 %
3	Common Area annual condition survey of known Asbestos.	5 %
4	Quality check of condition surveys reports	5 %
5	Audit of Specialist Contractors Procedures on site	10 %

5.2 Additional key performance targets will be set by the group from time to time to improve service quality and performance.

**6. RISK ASSESSMENT**

6.1 Action to be taken following the survey and identification of any asbestos containing material will be based on the findings of a risk assessment. The risk assessment will consider:

- The type of asbestos present, i.e. whether or not the more hazardous blue or brown asbestos is present.
- The percentage of asbestos present in the material.
- The friability of the material - i.e. the potential that the material will easily and rapidly release asbestos fibres in the event that it is disturbed.
- The condition of the asbestos material.
- The location of asbestos material(s) and whether the material is likely to be subject to accidental or intentional damage or disturbance.
- Hazard identification and risk rating.
- The date for re-inspection or review (normally annually).

6.2 Managers will nominate an appropriate member of staff who will be responsible for co-ordinating the arrangements for the Management Surveys to be carried out and a risk assessment to be produced. Where management require, these surveys will be undertaken by approved EastendHomes' licenced contractors who are competent and are appropriately qualified to carry out this type of activity.

- 6.3 The specialist surveyors will be responsible for preparing suitable written 'Plans of work' required by the Control of Asbestos at Work Regulations 2006. The Specialist Surveyors will also be responsible for the assessment of plans and site/activity specific risk assessments submitted by licensed asbestos contractors.
- 6.4 The specialist asbestos surveyor will lead on the drafting of generic risk assessments for the treatment and removal of asbestos materials. Following any incident related to asbestos the specialist survey shall review and advise on any policy revision or policy amendments.

## **7 INFORMATION**

- 7.1 Where asbestos materials are identified by the survey and the subsequent risk assessment records that it is reasonable and appropriate for the material to remain in situ, all reasonable steps will be taken to convey this information to those who will need to know of the hazard. For example those organising or supervising maintenance works such as Facilities Managers, Surveyors, Engineers and those undertaking maintenance works; maintenance staff, contractors and operatives etc. Such arrangements must exist in order to avoid unintentional damage to the material and the possible exposure of employees, contractors, residents and members of the public to asbestos fibres.
- 7.2 With respect to asbestos containing materials in residential and leasehold premises etc., other persons that need to be informed will also include the tenant, occupier or leaseholder and any persons concerned with ordering or specifying and/or carrying out maintenance, repairs or alterations to the premises or its facilities. This would include statutory undertakers, such as cabling and IT contractors and utility providers, such as gas, electricity and water authorities.
- 7.3 The information will be given to tenants and leaseholders by letter. Such information will be re-issued when required; following a change of tenant or leaseholder; following subsequent asbestos treatment or removal works; following accidental or deliberate disturbance of the material etc.
- 7.4 When specifying or instructing works, EastendHomes staff must ensure that contractor's operatives undertaking the works are made aware of the dangers caused by asbestos and the location of asbestos materials, in all circumstances where they are known or thought to be present.
- 7.5 In premises which have not been surveyed, and the presence (or not) of asbestos containing materials is therefore not confirmed, contractors' employees must be directed to exercise extreme caution and immediately report any suspect materials to EastendHomes' Technical Services. The contractor's employees must also be directed to immediately stop work, if it is suspected that asbestos containing materials have been disturbed and immediately evacuate operatives and any other staff from the work area. They must also immediately report such matters to EastendHomes' Technical Services.

7.6 Where it is reasonable and practical to do so, asbestos materials that remain in situ will be labelled, e.g. boiler rooms and plant rooms and asbestos containing materials in communal areas. Wherever practical, labelling should comply with the Health and Safety (Safety Signs and Signals) Regulations 1996. Labelling is not considered practical for areas to which tenants, pupils and members of the public have access, due to the possibility of encouraging acts of vandalism to the materials and/or the probability that the warning signs or labels will be wilfully removed. In communal areas in residential flats/other EastendHomes properties, discreet marking will be deployed (red dots or BS marking label), so that surveyors, other Technical Officers, estate staff, caretakers, Premises Managers etc. can visually confirm that asbestos containing materials are present in the area and can regularly monitor the condition of the material.

**7.7 In such areas, EastendHomes will introduce a marker or colour coded symbol, which will identify to EastendHomes competent persons and EastendHomes appointed contractors that asbestos is known to be present in the area.**

7.8 *Planned removal of asbestos containing materials:* In all circumstances where either planned maintenance projects or major works programmes are planned, the removal of asbestos containing materials from the property will be evaluated and considered as part of the planning process. Asbestos removal will be a priority and will be scheduled as part of the overall programme of works, so that the risk is eliminated.

7.9 *Information to residents:* The results of the asbestos survey of dwellings in residential blocks will be notified to residents. EastendHomes will ensure that a system is put in place for the dissemination of this information to all affected properties.

## **8. SELECTION AND MONITORING OF SPECIALIST CONTRACTORS FOR THE TREATMENT & REMOVAL OF ASBESTOS CONTAINING MATERIALS**

8.1 In addition to our statutory responsibilities under the Asbestos (Licensing) Regulations, EastendHomes will put into place arrangements for the selection, assessment and monitoring of all specialist contractors who are directly engaged by EastendHomes to work with Asbestos containing materials, including our appointed analytical laboratories.

8.2 In all circumstances where contractors are not directly appointed by EastendHomes arrangements will be put in place to ensure that any specialist sub-contractors appointed by the Principal Contractors are similarly monitored and appraised at regular intervals. This will be achieved by ensuring that any sub-contractor appointed has been assessed as being competent under either the Exor approved list validation or the Contractors Health & Safety Assessment Scheme (CHAS Scheme).

8.3 Sub-contractors who have not been approved either under the Exor or CHAS schemes will be given a limited time to comply with at least one of the schemes requirements and until compliant, will not be employed by EastendHomes for work with asbestos-containing materials or any asbestos-related works.

8.4 EastendHomes will ensure that suitably robust arrangements are in place to continuously monitor contractors appointed to undertake asbestos treatment and

removal works. EastendHomes Technical Services will be responsible for drafting protocols and audit arrangements for the inspection and routine monitoring of specialist contractors which may be via external consultants undertaking site inspection, monitoring and auditing of asbestos removal works.

- 8.5 Contractors engaged to undertake bulk sampling or air monitoring will be accredited by the UK Accreditation Service (UKAS) and comply with EN 45001, or any amendment thereof.

## **9 PROTOCOLS FOR WORK WITH ASBESTOS MATERIAL**

- 9.1 All work undertaken on asbestos will be carried out in accordance with the requirements of the relevant legislation, current HSE guidance notes and the EastendHomes' Policy and supporting procedures.

## **10. ASBESTOS ADVICE AND GUIDANCE:**

ASBESTOS ADVICE SHEET No.1 Raising Repairs to Handypersons

ASBESTOS ADVICE SHEET No.2 Emergency Procedure: Where suspected asbestos material is disturbed

ASBESTOS ADVICE SHEET No.3 Emergency Procedure: To Arrange for the Testing of Damaged Suspected Materials.

ASBESTOS ADVICE SHEET No.4 Void Works

ASBESTOS ADVICE SHEET No.5 Raising Repairs of an Intrusive Nature to Handyperson and External Contractors

ASBESTOS ADVICE SHEET No.6 Technical Officer Repairs Pre-Inspections

- 10.1 Copies of the Asbestos surveys are issued to all EastendHomes appointed Service Providers (both Principal Contractors and sub-contractors) whose work for EastendHomes may involve working directly with, or near to, asbestos containing materials.
- 10.2 The Principal Contractor must ensure that any work with or involving asbestos containing materials are subject to risk assessment. A site-specific risk assessment must be completed before work commences. The assessment must be approved by the contract Administrator prior to the commencement of works.

## **11 ARRANGEMENTS FOR ASBESTOS EMERGENCIES**

- 11.1 In the event that an asbestos (or suspected) emergency occurs, staff should immediately follow the emergency arrangements detailed in Asbestos Advice Sheet No. 2.

11.2 During normal office hours, staff should immediately inform the EastendHomes Technical Services Team who will make arrangements for licensed contractors to attend and deal with any asbestos related incidents.

## **12. INSTRUCTION AND TRAINING**

12.1 All relevant staff, i.e. anyone who undertakes work (*including minor repairs and maintenance*) or is concerned in any way with the requisition of works in EastendHomes premises, will receive sufficient instruction and training to prevent any person from being exposed to risk of inhaling asbestos fibres.

12.2 Managers will be responsible for identifying their staff that are required to attend asbestos awareness training. Staff who must attend include:

- Architects & Surveyors
- Engineers
- Technical staff
- Facilities Managers
- Premises Managers
- Estate staff and inspecting staff
- Caretaking, Horticulture and Improvement Team staff
- Building Attendants and persons deemed to be in control of premises.

12.3 The above list is not exhaustive and will require each manager to assess their training requirements.

12.4 This instruction and training will include:

- An explanation of how asbestos can cause irreversible damage to health.
- Common uses of asbestos containing materials and their likely locations in EastendHomes /other buildings.
- The requirements of health and safety legislation and HSE guidance relating to Asbestos.
- An appreciation of EastendHomes' own policies, procedures and codes of practice dealing with asbestos, including relevant contractual procedures. This will include the need to refer to the asbestos registers/survey reports etc. and the action that they will need to take in the event that suspected asbestos containing materials are damaged or disturbed.

## **13. HEALTH SURVEILLANCE**

13.1 Managers will make arrangements with the Occupational Health provider for staff identified as 'asbestos workers', to receive appropriate health surveillance. The Occupational Health provider will advise managers accordingly on the level of health surveillance required for individual staff members.

13.2 *Confirmed accidental/unintentional exposure to asbestos fibre release:* in the event of a staff member being exposed to a confirmed accidental or unintentional release of asbestos fibres the following action should be taken -

- The matter should be reported to the line manager and service head.
- An accident/incident report form should be completed and a copy sent to the line manager and Human Resources (to be placed on the personnel file), the EastendHomes safety advisor and the Occupational Health provider. Where necessary, the safety advisor will complete RIDDOR reporting.
- The staff member must seek advice from the Occupational Health provider following the exposure in case health surveillance checks are required.
- The staff member should notify their GP of the date and time and nature of the exposure, so that a record is kept on their personal medical file.
- All AIR forms will be reviewed at the quarterly Health & Safety meetings and consequently working practices and risk assessments may be reviewed to reflect learning outcomes.

#### **14. STAFF CONSULTATION**

- 14.1 Managers will consult with appropriate T.U. Health and Safety Representatives or Employee Representatives, on the arrangements for managing asbestos in EastendHomes workplaces. This will include providing information on asbestos surveys, asbestos registers, risk assessments and work action plans, which relate to individual workplaces, as applicable.