

ASBESTOS MANAGEMENT PLAN



Advance must take reasonable steps to locate materials in premises likely to have Asbestos Containing Materials (ACMs) and to check their condition. We must assess the risk of anyone being exposed to these materials.



Procedures for managing risk associated with asbestos are set out in this Asbestos Management Plan (AMP). This includes procedures for assessing risk, dealing with emergencies and removal of asbestos.



We must keep records of the location and condition of asbestos and presumed Asbestos Containing Materials and keep the record up to date. These need to be reviewed at least annually.



All asbestos surveys are recorded on our Asbestos Register in OPENHousing. The register contains information on the location and condition of all asbestos within Advance's property portfolio, together with the associated risk assessment.



At Advance, the Director of Housing is considered to be the 'Duty Holder' for the properties which are owned by Advance, as defined within Regulation 4 of the Control of Asbestos Regulations 2012.

Key Changes (Summary):

Policy Updated from November 2015 Version and to support the Asbestos Management Policy dated April 2018. The main changes from the previous policy are as follows:

- References to updated Regulations
- Closer references to Regulation 4 of the Control of Asbestos Regulations 2012 and HSE Guidance.
- Updated Emergency Procedures and regime of annual scheme inspections.

POLICY

1. AIMS AND OBJECTIVES

The purpose of the Asbestos Management Plan (AMP) is to provide a comprehensive framework for managing asbestos within Advance's premises. The plan explains the individual responsibilities and the actions that will be taken to minimise the risk of exposure to airborne asbestos to residents, of all directly employed personnel, contractors and visitors to site.

2. RESPONSIBILITY FOR ASBESTOS MANAGEMENT

At Advance, the Director of Housing (DoH) is considered to be 'Duty Holder' for the properties which are owned by Advance, as defined within Regulation 4 of the Control of Asbestos Regulations 2012.

The DoH assumes the Duty Holder responsibilities, including ensuring that reasonable steps have been taken to locate materials in premises likely to contain asbestos and to check their condition. The DoH is responsible for compliance with the Asbestos Policy, performance of all statutory requirements and delivering our asbestos management safety commitments.

The DoH will identify an appointed person(s) to carry out operational requirements. The appointed person will be the Head of Property Services (HoPS) although this may be amended from time to time, subject to operational necessity.

3. LOCATION AND CONDITION OF ACMs

Existing information regarding the location and condition of ACMs at a given property is held in electronic format within the Asbestos Register in OPENHousing and is maintained by the Property Services Team at the Leicester Office.

Advance has a program to undertake Management Surveys as specified in HSG 264 The Survey Guide of its housing stock (constructed pre-2000).

The surveys are carried out by external consultants whose operatives are qualified to a minimum of BOHS P402 certification. Advance has a legal responsibility to carry out a comprehensive sampling asbestos survey of all of its properties and workplaces, where we are responsible for this under our tenancy and / or ownership agreement.

Where major works are planned Advance will carry out a Demolition and Refurbishment survey as specified under HSG 264. Any previously identified ACM that is subsequently removed will be recorded in the Asbestos Register so the ACM data of each property stored is up to date. Demolition and Refurbishment Surveys may still be required even after a previous Management Survey has not identified any ACMs at a property.

4. ASBESTOS RISK ASSESSMENTS

All identified and presumed ACM will be given a risk assessment score by the Surveyor. These scores are formed from a Material Assessment algorithm and a Priority Assessment algorithm. These algorithms take into account the type and condition of the asbestos and the ease with which it will release fibres (Material) and the likelihood of people disturbing the ACM (Priority).

5. MATERIAL ASSESSMENT ALGORITHM:

Variable	Score	Example
Product Type	1	Vinyl floor tile
	2	Asbestos Insulating Board
	3	Thermal insulation
Extent of damage	0	Good condition
	1	Low damage
	2	Medium damage
Surface treatment	3	High damage
	0	Vinyl tiles
	1	Encapsulated Asbestos Insulating Board
	2	Unsealed Asbestos Insulating Board

	3	Unsealed lagging
Asbestos type	1	Chrysotile
	2	Amphibole (excluding crocidolite)
	3	Crocidolite

The material assessment is extracted from HSG264 and is based on a simple additive algorithm. The value assigned to each of the four parameters is added together to give a total score. Materials with scores of 10 or more are rated as having a high potential to release fibres, if disturbed. Scores of between 7-9 are regarded as medium potential and between 5-6 a low potential.

Scores of 4 or less have a very low potential to release fibres. Non-asbestos materials are not scored.

The material assessment identifies the 'high hazard' materials; it does not automatically follow that those materials assigned the highest score will be the priority for remedial action. Priority is determined by carrying out a risk assessment (i.e. priority assessment) which will take into account the following:-

6. PRIORITY ASSESSMENT ALGORITHM:

Priority Assessment		
Normal Occupant activity		
Assessment Factor	Score	Example of score variables
Main Types of activity in area	0	Rare disturbance activity (e.g. little used store room)
	1	Low Disturbance activities (e.g. office type)
	2	Periodic disturbances (e.g. vehicular or commercial which may contact the ACMs)
	3	High Levels of disturbance (e.g. fire door with AIB) in constant use
Secondary activities for area	As Above	As Above
Likelihood of Disturbance		
Assessment Factor	Score	Example of score variables
Location	0	Outdoors
	1	Large rooms or well ventilated areas
	2	Rooms up to 100 m ²
	3	Confined spaces
Accessibility	0	Usually incapable or unlikely to be disturbed
	1	Occasionally likely to be disturbed
	2	Easily disturbed
	3	Routinely disturbed
Extent/amount	0	Small amounts or items (Strings, gaskets)
	1	up to 10m ² or 10 LM
	2	10 - 50m ² or 10 - 50 Lm
*average of all 3 used	3	Greater than 50m ² or 50lm
Human Exposure Potential		
Assessment Factor	Score	Example of score variables

Number of Occupants	0	None
	1	1 - 3
	2	4 - 10
	3	more than 10
Accessibility	0	Infrequent
	1	Monthly
	2	Weekly
	3	Daily
Extent/amount	0	up to 1 hour
	1	1 - 3 hours
	2	3 - 6 hours
*average of all 3 used	3	more than 6 hours

Maintenance Activity		
Assessment Factor	Score	Example of Disturbance
Type of activity	0	Minor e.g. possible contact when gaining access
	1	Low e.g. changing a light bulb
	2	Medium e.g. lifting 1 or 2 AIB ceiling tiles to access loft
	3	High removing a number of AIB boards to replace valves
Frequency of activity	0	ACM unlikely to be disturbed
	1	less than once per year
	2	More than once per year
*average of all 3 used	3	More than once per month

The priority assessment can only be carried out with the detailed knowledge of all of these factors but, whilst the surveyor can provide assistance and guidance, it is the duty holder, under CAR 2012, who is required to make the Priority Risk assessment using their detailed knowledge of the activities carried out in the premises.

The combined material and priority assessment results should be used to establish the priority for those ACMs needing remedial action and the type of action that will be taken. There are various remedial options available; in many cases the ACMs can be protected or enclosed, sealed or encapsulated, or repaired. These options should be considered first. Where such actions are not practical, ACMs will need to be removed.

The scoring system helps to prioritise the required actions; for example, those with higher scores are most likely to require the most urgent action. The algorithms help to account for the fact that a person has to actually breathe in asbestos fibres for it to be harmful and that there is no health risk simply from a damaged and friable ACM.

The Risk Assessment will form the basis of asbestos management and will be used to determine the management and control actions necessary.

7. MANAGEMENT OPTIONS AND ACTION PLAN FOR IDENTIFIED/PRESUMED ACMs

Where previous surveys have identified ACMs, that information is incorporated into the Asbestos Register. This will be kept, maintained and co-ordinated by the Head of

Property Services (HoPS). This information is freely available for reference. Where no information regarding ACM is available, it must be presumed that asbestos containing materials are present until a survey has been completed.

When the ACMs have been assessed and scored a management plan can be created based upon the scores assigned. Options available:

- Protect/Enclose the ACM
- Seal/Encapsulate the ACM
- Repair the ACM
- Remove the ACM (Least preferred option)

Measures needed in all cases where ACMs are present

- Communicate the presence of ACMs to those at risk
- Monitor ACMs left in-situ
- Ensure Safe system of work in place

An Asbestos Action Plan is to be developed and reviewed annually or as follows:

- Whenever the use of an area changes.
- Whenever circumstances change.
- Should there be reasons to suspect the plan is no longer valid.
- In the event of an incident such as accidental damage.

8. LONG TERM ACM MANAGEMENT

The overall aim is to ensure that all ACMs are effectively managed and the risks reduced to their lowest practical level. This will be achieved through initial surveying resulting in any necessary remedial or removal works, re-inspections and monitoring. There is no risk from ACMs if they are not disturbed. Therefore Advance do not plan to remove all ACMs as a matter of course, rather only those where the risk to health warrants this and there is no other option as described above.

9. MONITORING AND RE-INSPECTION

All ACMs will be re-inspected periodically in accordance with CAR 2012, and the priority rating determined by risk assessment (refer to the tables above). Re-inspections will be carried out by competent persons with a minimum of asbestos awareness training. The aim of this re-inspection is to ensure there are no changes to the condition of the ACMs or the circumstances/environment of the ACM and to use this information to update the Asbestos Register and inform for Audit purposes. To this end an annual inspection should be raised on the OPENHousing system and the revised survey sheet, indicating the specific ACM, saved against the property in Documotive.

10. TRAINING

All Advance staff whose day-to-day activities may take them into areas containing ACMs or who's role means they may have to deal with or advise upon ACM location,

repair etc. will be provided with appropriate training or advice dependent upon the level required; that ACM in good condition is safe and usually best left in place; and the procedures to follow if damaged ACMs are found.

External maintenance and building contractors will be expected to have their own specific company training to include the health effects of ACM; premises and site specific risks from any ACM; procedure of work that could disturb ACM; accidental disturbance procedures; the reporting of incidents; and the identification of the contractor's responsible person/s. The Contractors will also be required to undergo, maintain and confirm, if requested, a suitable formal refresher training programme.

Responsibility for the maintenance of the Asbestos Register, training, annual action plan and appointment of suitably qualified contractors rests with the DoH although day-to-day management will be undertaken by the HoPS through the Property Services Managers.

11. DISSEMINATION OF INFORMATION

The Asbestos Register is held within the OPENHousing system, the survey report is held in Documotive. The Asbestos Policy and Management Plan is maintained and periodically reviewed by the HoPS.

A summary of the ACMs or assumed ACMs from the asbestos surveys carried out are contained within the Asbestos Register held by the HoPS. This will be shared with contractor and consultants prior to maintenance or remedial works taking place. A full copy of the asbestos risk assessments for each site is available by e-mail at short notice or in an emergency if no access to the OPENHousing system.

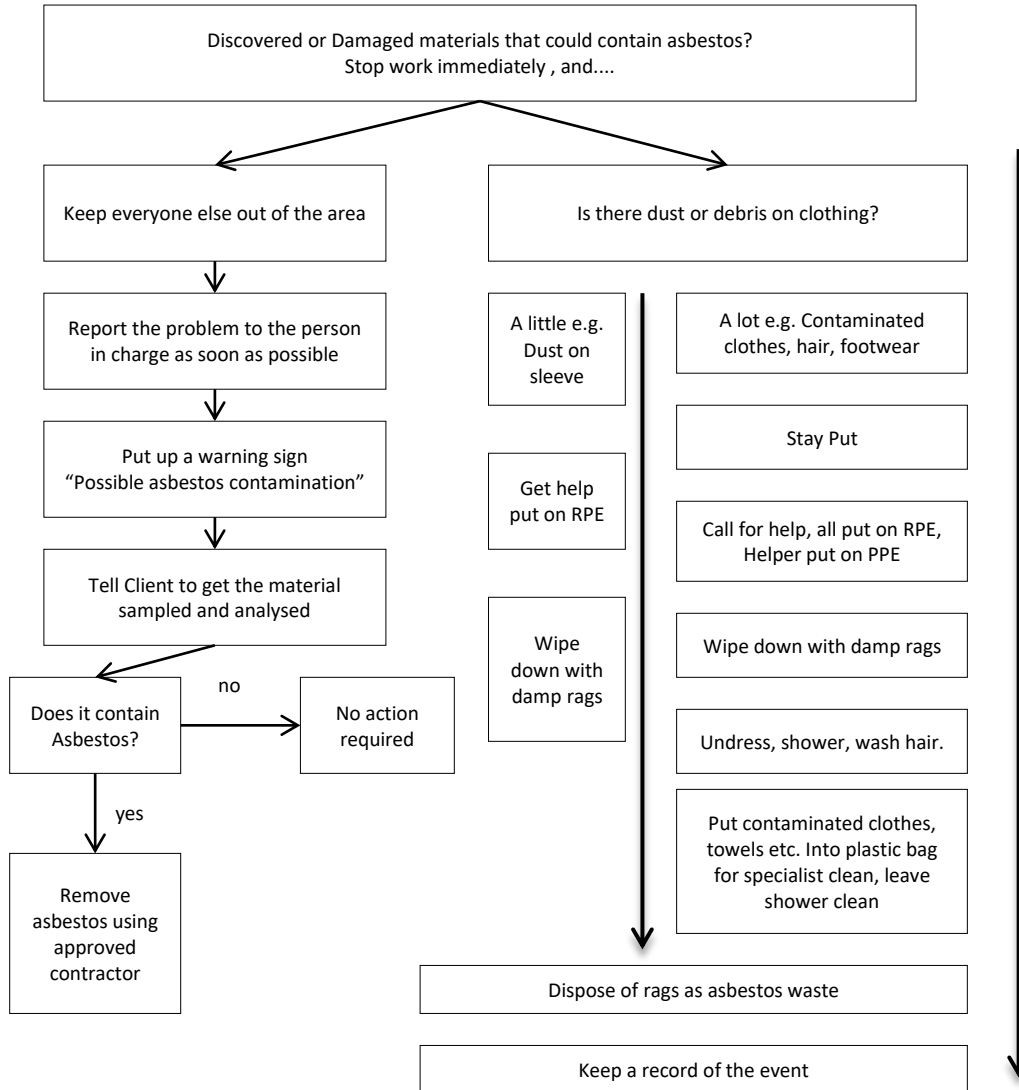
The summary will comprise extracts from the Asbestos Survey Report relating to areas surveyed and those where there was no access; locations where samples were taken, and the risk assessment for all samples taken.

All contractors retained on term contracts are issued with current copies of the Asbestos Register.

12. EMERGENCY PROCEDURES

The HSE have a document called Asbestos Essentials, a series of method work sheets describe how to work with Asbestos in various situations. Sheet EM1 See appendix A, covers how to deal with situations where a person unexpectedly comes into contact with ACMs and fibres have potentially been released

Asbestos Essentials EM1 for dealing with unexpected release of fibres:



13. THE ASBESTOS REGISTER

Location and Access

The asbestos register is held in electronic format within Advance's Housing Services OPENHousing system. A copy will be provided to contractors and consultants prior to maintenance or remedial works taking place. This Asbestos Management Plan is maintained by the HoPS who is responsible for its monitoring and review. Relevant sections are available for contractors.

It is a record of all known ACMs throughout the Advance's portfolio and contains information about the extent and condition of the material and priority risk assessments.

Updates

The HoPS will update the Register based on investigation, sampling and remedial works carried out and information gained during inspections or supplied by contractors, staff or tenants.

A regular audit / re-inspection will be undertaken to check that the Register has been kept up to date. This will be organised by the HoPS.

14. PROCEDURES

Procedure for Previously Unidentified ACM

It is the responsibility of all staff to report any suspect ACM material to their local manager. Property Services must be notified where such material was identified, who will ensure that the suspect material is inspected in accordance with HSG264 and a risk assessment made.

Previously unidentified materials may be discovered for example where rooms or parts of the interior or exterior of a building were inaccessible at the time of the historic management surveys.

Suspect material should not be disturbed until the material has been inspected by a competent person and in accordance with the above.

Procedure for Damaged ACM

It is the responsibility of all staff to report any damaged ACM material to the local manager. Property Services must be notified where such material was identified and will ensure that a risk assessment is undertaken.

Damaged material should be left in place and the immediate area evacuated and sealed off if possible to avoid further potential contamination from asbestos fibres. The material should only be handled by suitably trained and competent contractors.

Procedure for Building Project Works

Where demolition or major refurbishment is planned a Refurbishment and Demolition Survey (full access sampling and identification survey) must be undertaken before a project starts where the works entail exposure of parts of the structure or fabric that

could not be seen during the Management surveys. This may even mean a part-destructive survey in the particular area of a building where works are to be undertaken.

If suspect materials are discovered during the course of building works the supervising contractor will halt work and take any necessary or recommended action which may include informing staff and building occupants and clearing the site only returning once the ACM has been dealt with appropriately.

It is likely that the removal of the material will be recommended in the majority of projects, the cost being charged to the actual project. On completion of the remedial works the Project Manager must submit a completed Asbestos Removal Notification Form and all relevant documentation so that the asbestos register can be updated.

Procedure for Giving Contractors Access to the Register

The Asbestos Register will be provided and all relevant personnel and contractors must refer to this prior to starting any work.

Procedure for Working with ACM

Work with or removals of ACM whether Non-licensed, Notifiable Non-licensed or Licensed will be carried out in strict adherence with the following documents:

- Control of Asbestos Regulations (CAR) 2012.
- Asbestos Essentials a task manual for work with Non-licensed asbestos
- HSG 247 Asbestos the licensed contractors guide

The contractor will produce a plan of work including all necessary method statements and risk assessments. The plan must include the proposed asbestos stripping technique and an assessment of the likely exposure to employees, together with emergency procedures. The HoPS or appointed agents, as Advance's representatives, have a legal duty as representatives of the duty holder to check the contractor's method statements and risk assessments.

Disposal of asbestos waste will be in accordance with the Hazardous Waste (England and Wales) Regulations 2005.

Procedure for ACM Removal

Removal of asbestos is a hazardous operation and must be carried out under strictly controlled conditions. The works are to be undertaken as set out above depending upon whether the work is licensable or not.

The contractor will employ an onsite supervisor who holds a valid training certificate (minimum P405) in supervising asbestos removal works.

The contractor is to adhere to the current approved control levels and action limits when working with asbestos. All required PPE and decontamination units will be provided by the contractor to his employees and anyone found not wearing appropriate PPE will be required to leave the site.

Following the asbestos removal works, the contractor will arrange suitable air testing and appropriate certification to be produced prior to any reinstatement works. Air tests must be carried out by an UKAS accredited organisation complying with ISO

17025. Reference to HSG 248 'Asbestos: The analysts' guide for sampling, analysis and clearance procedures' is recommended.

Procedure for ACM Left In-Situ

Advance records information as to the type, quantity and location of asbestos for every premise containing or presumed to contain ACM. This record will be held by the Property Services team in the OPENHousing system.

During the initial asbestos identification surveys Material and Priority Risk Assessments will / have been carried out using algorithmic techniques as set out in HSG264 and HSG 227 to help determine whether asbestos will be managed in-situ or removed.

As a general minimum guideline, the following frequencies of ACM re- inspections, as linked to the risk assessment priority scaling are as follows. Note that the frequency is risk related and the re-inspection frequencies are to be used as a general guideline only.

Advance – Asbestos Management Plan Risk Assessment	Inspection Frequency (months)
Very Low	24 months
Low	18 months
Medium	12 months
High	1-3 months (removed in dwellings)
Very High	To be Removed

Advance will carry out re-inspections every 12 months to ensure that no damage or significant deterioration to the ACM has taken place since the previous inspection. The dates of the inspections and results are to be held on the Asbestos Register. Any damage or deterioration to the edges or surface must be reported to the HoPS who will arrange for priority remedial works to be put in hand if required.

For those cases where refurbishment involves design work, the project manager must identify all areas of ACM as required under the Construction (Design and Management) Regulations 2015, i.e. Regulation 11 and notify these to the designer or Main Contractor for inclusion in the projects risk assessment. Where the design involves dismantling and exposure of areas not previously inspected for the purposes of asbestos identification, the designer must take all necessary actions to determine if ACMs are being used in these areas and prevent discharge of asbestos fibres to the air during the dismantling process. In any cases where asbestos is discovered after dismantling work has commenced, all work in that area must cease immediately and the managing agent and HoPS informed immediately who will instruct further actions to be taken.

Procedure for premises leased to / from a third party

The organisation's responsibilities as a Duty Holder under Regulation 4 of CAR 2012 may vary dependent on the terms of the lease to a third party, the use of the premises being leased and the extent of any "common parts".

Common parts are normally part of the landlord's retained responsibility and any ACMs in these parts of the premises will need to be managed in accordance with the criteria set down in previous sections.

In the case of premises let on a Full Repairing and Insuring (FRI) lease, the responsibility for identifying and managing asbestos will be the responsibility of the lessee. In order that Advance as the owner / controller of the premises can satisfy itself that the lessee is carrying out their duties under the Regulations, Advance will write to the lessees enquiring as to the actions being taken and request evidence as to implementation. In those cases where Advance is already aware of the presence of ACMs, its whereabouts and details will be divulged to the lessee.

For those premises leased out on an internal repairing lease only, the responsibilities of the duty holder may be split between the lessor and lessee. In these cases the lease covenants will have to be examined to discover the degree of responsibility placed on each party. However, Advance will, in the majority of cases, accept that it has a duty to determine the presence of asbestos or otherwise and where this is not to be removed, make it clear to the lessee that they (the lessee) have the obligation to manage the asbestos. Advance will request a copy of the management plan and request that this and any monitoring be updated and reviewed.

On disposal of property, the HoPS will provide all known ACM information to the new owner and amend Advance's current records accordingly.

15. DATA PROTECTION

Where personal information of any individual is collected, shared or otherwise processed in pursuit of the objectives of or guidance within this policy, this must be performed in accordance with the Data Protection Policy, the Information Security Policy, the General Data Protection Regulations, and any other relevant guidance on handling personal data responsibly.

Any records made as a result of following this policy must be retained in accordance with the Retention of Records Policy.

16. DIVERSITY & EQUALITY

Advance will apply this policy consistently and treat all customers with fairness and respect. We recognise that we have an ethical and legal duty to promote equality of opportunity and prevent discrimination on the grounds of age, sex, sexual orientation, disability, race, religion or belief, gender reassignment, pregnancy and maternity, marriage and civil partnership.

Related Policies:	<ul style="list-style-type: none"> • Asbestos Policy • Data Protection Policy • Equality & Diversity Policy • Retention of Records Policy
Related Documents:	

Administrative purposes only:

Policy owner:	Director of Housing
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Advance - Policies and Procedures

Date written:	November 2015	Version: 1
Review written/refreshed by:	Head of Property Services Date: March 2018	
Draft consulted upon with:	Director of Housing	
Approved by: GMT	Version: 1B	Date of Approval: 20 July 2018