

Asbestos

Management Plan and Procedure



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Related Policy:		AM 05	
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Owner:	Victoria Hennessy	Job Title:	Asset and Compliance Manager
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Method of Delivery (check as needed)			
<input checked="" type="checkbox"/> Learn Pro <input type="checkbox"/> Board Portal <input type="checkbox"/> Line Manager to Share (e.g. Agencies)		<input type="checkbox"/> Policy Owner to Notify (e.g. Contractors) <input type="checkbox"/> Other: _____	
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<input type="checkbox"/> Board of Management <input type="checkbox"/> All Staff <input type="checkbox"/> ET/SLT <input type="checkbox"/> Head Office Managers <input type="checkbox"/> Head Office Staff <input type="checkbox"/> Finance <input type="checkbox"/> Housing <input type="checkbox"/> Asset <input type="checkbox"/> ICT		<input type="checkbox"/> OD <input type="checkbox"/> Compliance <input type="checkbox"/> All Care & Support <input type="checkbox"/> C&S Managers (RM,OM, CSM) <input type="checkbox"/> C&S Staff <input type="checkbox"/> Contractors <input type="checkbox"/> Agency Staff <input type="checkbox"/> Unite the Union <input type="checkbox"/> Employee Voices Group <input checked="" type="checkbox"/> Other: Asset Compliance Consultant	

Version Control

Date	Owner	Version	Reason for Change
Oct 2024	Victoria Hennessy	4.0	Cyclical Review
Jan 2020	Jackie O'Neil	3.0	3 yearly review and new format

Summary of Changes

Section	Change
All	Changed name from Control of Asbestos Procedure
3.0	Roles and Responsibilities – Duty Holder, Responsible Person and Deputy Responsible Person
4.0	Training Plan updated
All	Job titles updated throughout the policy due to restructure
3.0	Section 3 added information

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1.0 Introduction

This Asbestos Management Plan (AMP) has been developed to supplement the asbestos policy and ensure compliance with the defined and implied duties contained within the *Control of Asbestos Regulations 2012 (CAR12)*.

The AMP provides information and guidance on how Ark manages known and suspected asbestos within all properties owned and managed.

2.0 Learning and Development Requirements

Employees who are responsible for works associated with asbestos; are required to read, understand, and comply with Ark's Asbestos Management Policy AM 05 and Ark's Asbestos Management Plan and Procedure AM 05i and complete any training that is required of their role.

3.0 Asbestos Method of Control

3.1 Asbestos Management Plan

This AMP applies to all the organisation’s housing stock and commercial premises, where relevant. For further information on asbestos management roles and responsibilities, refer to Appendix 3.

The following table summarises the Asbestos Register utilised within Ark:

Format and Storage location	Current Contract is with Envirotec	
Persons with access	Responsible Person:	Asbestos Responsible Person (ARP)
	Other persons with access:	Asbestos Co-ordinator (AC)
		Works Duty Holders, Employees and Contractors
Updating arrangements	Updated by ARP	

Where available, information on the ACM’s known/suspected to be present in each relevant premises will be included in the Register including their location and condition along with details on how best to manage / remediate the material. The Register will also clearly detail the type of survey carried out and upon which the data has been based (e.g. management, refurbishment, localised refurbishment, demolition, cloned, etc.) in order that any user may reliably identify the suitability of the data for a particular use.

The ARP will be responsible for the overall management and maintenance of the Asbestos Register. This will include accountability for the data remaining accurate, appropriate and unambiguous. Any work which may affect the Register e.g. asbestos removal, must be reported to the ARP within 3 days of completion. The asbestos register must be updated within 10 days of completion.

The AC will be responsible for providing all reasonable support to the ARP in the management and maintenance of the Register.

Works duty holders and other relevant employees will use the data contained in the Register only for its proper purpose. Where there is any doubt over the accuracy, appropriateness or

ambiguity of asbestos data for a particular situation or use, then advice will be sought from the AC or ARP.

All contractors used by the organisation have access to the Register and can view full property details.

The ARP and AC will provide interpretation of data held on the Register, together with advice on its use, limitation and recommendations for further surveying, as requested.

3.2 Survey Strategy, Reinspection's and Void Property Process

The ARP is responsible for the overall management and maintenance of the Asbestos Register and will also hold ultimate responsibility for the delivery of the asbestos surveying strategy.

Take reasonable steps to find materials likely to contain asbestos;

- Presume materials contain asbestos, unless there is strong evidence to suppose they do not;
- Assess the risk of the likelihood of anyone being exposed to asbestos from these materials;
- Make a written record of the location and the condition of the ACMs and presumed ACMs and
- Keep it up to date; repair or remove any material the contains or is presumed to contain asbestos, is necessary because of the likelihood of disturbance, and its location or condition;
- Prepare a plan to manage that risk and put it into effect to ensure that;
- Information on the location and condition of ACMs is given to people who may disturb them;
- Any material known or presumed to contain asbestos is kept in a good state of repair;
- Monitor the condition of ACMs and presumed ACMs; and
- Review and monitor the action plan and the arrangements made to put it in place

For the avoidance of doubt, all surveys will be defined and specified as per the guidance provided in *HSE Guidance Note HSG264 Asbestos: The survey guide*, that is:

- Asbestos Management Survey (for normal occupancy risk)

- Asbestos Refurbishment Survey (before intrusive works or disturbance of building fabric)
- Asbestos Demolition Survey (before demolition of a building)
- Asbestos condition monitoring or 'survey re-inspection' (to re-assess the risks of known ACMs at regular intervals)

Any standalone sampling and/or materials analysis would also be required to comply with HSG264 and, where appropriate, HSG248 *Asbestos: The Analysts' Guide for Sampling, Analysis and Clearance Procedures*.

It is recognised that in certain commercial contracts it may be deemed appropriate to include Asbestos Refurbishment and Demolition Surveys within works 'packages' (i.e. to be arranged by the contractor). In any such cases, Ark will retain the overall responsibility for ensuring that the appropriate type of survey is carried out by a competent body. This will require liaison and effective communication with the contractor(s) at the planning stage of any works and the inclusion of expectations (e.g. the requirement for UKAS accredited surveyors to be used) in contract documentation.

Ark utilises the services of external asbestos organisations to carry out asbestos surveying, sampling and testing works. All such organisations will hold UKAS (United Kingdom Accreditation Service) accreditation for asbestos inspection (17020 - surveying and sampling) and testing (17025 - for identification of asbestos in samples) as appropriate.

Asbestos Management Survey programmes will be carried out across all commercial premises and common areas of Ark's housing/domestic stock. Common areas include circulation areas, stairwells and cupboards, attics and stores to which access may be gained from a common area. Any identified ACMs will be subject to reinspection every 6 - 12 months and or Envirotech to carry out reinspection.

Asbestos Refurbishment or Demolition Surveys will be carried out ahead of any planned works on the fabric of any premises (domestic, common and commercial) controlled by the Organisation or for which CAR12 would define the Organisation as the Duty Holder (e.g. where works are arranged by the Organisation).

Asbestos Reinspection's (i.e. condition assessments to determine whether known ACM's have deteriorated and to update the risk assessment) will be carried out at regular intervals to non-domestic areas. **The frequency for reinspection of individual known ACMs will be determined based on the result of the Material and Priority risk assessments. Domestic premises will not be subject to routine reinspection's.**

It is noted that current legislation (specifically CAR12) does not subject 'domestic dwellings' to the requirement for Asbestos Management Surveys (although Refurbishment and Demolition Surveys are required). However, Ark recognises the increasingly common stance

of undertaking Management Surveys to domestic dwellings for the purpose of ensuring 'safe' housing as expected of a responsible Landlord. To this end the organisation will complete asbestos management surveys within their portfolio of domestic properties at the following points:

- Prior to any major refurbishment works, targeted refurbishment surveys (works specific) will be completed with management survey to the remainder of the property.
- When the property becomes "void" then it is likely that some refurbishment will take place, however where this is not the case a management survey will be completed.

The aspiration of the organisation is to, over time collect data on all its domiciles to further ensure tenant and resident safety.

3.3 Planning and Organising Work on Buildings

No work will be permitted on the fabric of (pre-2000) buildings unless and until appropriate ACM data is available and properly reviewed.

Prior to any works starting, and if works would have the potential to disturb ACMs, appropriate measures will be taken, including the prior removal of ACMs, amendments to work programme, etc. The ARP, as supported by the AC, will be responsible for determining the appropriate course of action.

Prior to any works starting, works employees/tradespersons/contractors will be required to demonstrate to the ARP and AC adequate and appropriate competence, training and risk assessments and method statements (RAMS) insofar as asbestos is concerned (e.g. 'Asbestos Awareness' training as a minimum for all general works and 'Minor Work with Asbestos' (Category B) where it is foreseeable that asbestos may be disturbed). Unannounced and/or planned audits and site inspections may be undertaken by the AC to monitor compliance with safe working procedures.

If materials suspected to contain asbestos are discovered during any works, the works must be immediately halted, and advice sought from the ARP or AC who will determine the appropriate course of action. This may require samples to be taken of any suspected materials, additional surveying, etc. in accordance with the prescribed procedures.

3.4 Reactive Repairs, Planned and Capital Works Procedure

The address of each repair request will be checked against the Asbestos Register before raising a Works Order, commissioning works or planning works.

If ACMs are recorded on the register for the particular property (and in areas which may be affected by the works), the Works Duty Holder will escalate the job to the AC or ARP who will liaise with the contractor as appropriate.

If there is no asbestos information for the address, the job will be escalated to the AC or ARP, who will arrange for an asbestos refurbishment survey or bulk sampling. If asbestos is not found, all parties will be informed, the Register updated, and the works permitted to proceed. If asbestos is found, the AC or ARP will liaise with the contractor as appropriate.

If the asbestos information is not based on an Asbestos Refurbishment Survey which includes the specific areas to be worked upon, then the job will be escalated to the AC or ARP, who will arrange for an asbestos survey or bulk sampling. If asbestos is not found, all parties will be informed, the Register updated, and the works permitted to proceed. If asbestos is found, the AC or ARP will liaise with the contractor as appropriate.

Only when appropriate asbestos information is available for the specific areas affected by the works will this information be shared with the contractor and their RAMS for the works requested. The Duty Holder (or, if asbestos is likely to be encountered, the AC/ARP) will then review the RAMS and approve the works to proceed, request amendments, etc.

For 'emergency works' in premises or areas which have no asbestos data, special requirements may need to be adopted, including discussions and risk assessments between the AC/ARP and the contractor, discussions with the Asbestos Consultant and the attendance of an Asbestos Surveyor/Analyst to advise on safe working procedures and/or carry out air testing. Each situation will be assessed on its own merits and the optimum way forward determined.

Special care will always be taken when using 'cloned' survey data. For example, if an area has been 'cloned' then it will have been deemed likely that this area has the same asbestos profile as another property (in which a survey was carried out). However, it is recognised that differences may occur between individual properties, and it is important that caution be exercised by all trades working within properties in which 'cloned' data has been used. All contractors should, of course, have received asbestos awareness training (UKATA Asbestos Awareness – or equivalent - as a minimum) and will be instructed to halt works and inform the Works Duty Holder if any suspect materials are identified.

3.5 Tenants Works Procedures

In all cases of tenant work requests, the Works Duty Holder will assess the required written request for the proposed work and interrogate the register for any known ACMs. It is, however, recognised that Management surveys within domestic dwellings are out with the requirements of CAR12 and it is not always likely that relevant asbestos data will exist. The Works Duty Holder will make a valued judgement on each case, based on its own merits, and may opt to conduct a site visit to assess the proposed work with the tenant and discuss any requirements for asbestos surveying/bulk sampling.

If surveying/bulk sampling is deemed appropriate, then another judgement will be made as to whether the Organisation will carry out such an assessment. The tenant will be informed of the reasoning behind any decisions made prior to authorising or rejecting the application.

4.0 Working with Asbestos Containing Materials

Most work likely to disturb or remove asbestos must be carried out by an HSE licensed asbestos removal contractor (LARC) and notified to the HSE 14 days prior to commencement. However, *CAR12* does allow work with certain lower risk asbestos containing materials (e.g. asbestos cement and asbestos textured coatings) to be carried out by non-licensed personnel and without notification to the HSE. The three categories of asbestos work are:

- **Major Works: Licensed works** – Work to be undertaken by a Licensed Asbestos Removal Contractor who must notify the Health and Safety Executive (HSE) at least 14 days before work commences using the ASB 5 form;
- **Minor Works: Notifiable non-licensed works (NNLW)** – notification before works start (no time limit) by an NNLW1 form and works to be completed by a competent (but not necessarily licensed) contractor;
- **Minor Works (lowest risk category): Non-notifiable non-licensed works (NLW)** – no notification but works to be completed by a competent (but not necessarily licensed) contractor.

The HSE flowchart found in A0 of HSG210 has an indicator to the categories of work and can be found [here](#).

Where any doubts exist over the correct classification or scope of asbestos works, advice will be sought from the Asbestos Consultant prior to any works being carried out. The Organisation may also appoint a competent Asbestos Project Management Consultancy to scope, specify, tender and project manage asbestos contracts, where works are of a complex nature.

Where work is not required to be carried out by licensed contractors (i.e. Minor Works) it will, nevertheless, be undertaken in a safe manner, by appropriately trained personnel, reducing the generation of airborne dusts to as low a level as is reasonably practicable. All Plans of Work for such work will be reviewed by a competent person (ARP/AC or the Asbestos Consultant or Project Manager) prior to work commencing.

For licensed asbestos works, the following documentation will be requested from the LARC prior to commissioning, and copies kept in the job file:

- Current asbestos licence check on HSE website;
- Insurance certificate indicating the insured is covered for asbestos work;
- Medical examination certificates (conducted by an Employment Medical Advisory Service appointed doctor) for personnel who will work on the job;
- Training records by a United Kingdom Asbestos Training Association (UKATA) member or equivalent (IATP/ROSPA);
- Where applicable, appropriate notification of the job;
- Method statement and risk assessment for the job (Plan of Work).

For non-licensed asbestos works, the following documentation will be requested from the contractor prior to commissioning, and copies kept in the job file:

- Insurance certificate indicating the insured is covered for asbestos work;
- For Notifiable Non-Licensed Works (NNLW), medical examination certificates (conducted by a licensed medical practitioner e.g. a GP) for personnel who will work on the job. Note, medical examination certificates are not required for normal non licensed works (NLW);
- Training records for all personnel who will work on the job (Category B training), provided by a United Kingdom Asbestos Training Association (UKATA) member or equivalent;
- For NNLW work (not required for NLW work) notification of the job to the HSE prior to commencement;
- Method statement and risk assessment for the job (Plan of Work).

All appropriate monitoring will be carried out to ensure that asbestos related consultants and contractors are demonstrably complying with their defined responsibilities under Roles and Responsibilities Sections in Appendix 3. Monitoring is also required to ensure the Organisation, as 'client', discharges its legal obligation to properly monitor contractors. This may include the appointment of the Asbestos Consultant or Asbestos Project Manager to carry out:

- On-site project management, auditing, supervision, monitoring and testing to ensure safety and quality control and compliance with all legal requirements;
- Completion of a final site review to verify the suitability for the site for handover and the completion of works as agreed.

At the conclusion of all asbestos works where air testing is required and prior to reoccupation of the area (unless included within an Asbestos Project Management package), the Organisation will directly appoint a UKAS accredited Asbestos Analyst to carry out the required level of inspection and test (i.e. the Contractor will not be permitted to appoint the Analyst). For licensed works this will include a '4-stage clearance test' and for minor works this will include a visual inspection and reassurance air test. Care will be taken to ensure this is excluded from the contractor's initial proposal and price.

Copies of all test certificates, Certificates of Re-occupation and evidence of correct waste disposal will be received from Contractors and Asbestos Analysts (or the Asbestos Remediation Project Manager) within 10 working days of the completion of any work involving asbestos containing materials.

Following all asbestos removal work, the AC or ARP will update the Asbestos Register within 10 days of the works being completed.

4.1 Working with Emergencies and Incident Investigation

Any person completing work on Ark properties will be expected to have their own emergency procedures in accordance with Regulation 15 of CAR 2012. Ark will check these prior to award of works/contractor approval along with the current training records for the organisation/individual.

In the case of an incident involving asbestos, the initial priority is the prevention of exposure to individuals. An example of emergency procedures can be in appendix 2 of this document.

The Asbestos responsible Person or deputy will be responsible for arranging a UKAS accredited asbestos analyst to attend site within 4 hours to complete air monitoring where necessary reassurance is required.

Depending on the incident the above may also request the attendance of a Licensed Asbestos Removal contractor to complete cleaning or decontamination.

The Asbestos Responsible Person will ensure an investigation is carried out following any asbestos incident or near miss.

4.2 Incident Investigation

This document is designed to ensure that all asbestos related incidents are adequately and timeously addressed with the appropriate level of technical competence and seniority commensurate with the nature of the incident, the risks involved and other relevant circumstances.

It is recognised that 'incidents' is a broad term, and this procedure will be relevant for, but not limited to:

- The identification of uncontrolled / unmanaged ACMs;
- Asbestos related complaints;
- Asbestos related insurance, personal exposure and legal claims;
- Regulatory Authority investigations and enforcement action relating to asbestos governance and compliance;
- Significant compliance breaches and audit findings.

The AC will inform the ARP of all new incidents without undue delay. The ARP will assess the potential severity of the situation, based on its merits, and advise on the appropriate way forward. The ARP will maintain overall responsibility for each incident and its investigation through to its logical conclusion and will ensure that all incidents/claims are treated to the appropriate level of competencies and resources (which may require the introduction of additional in-house or external support) in a timeous fashion and are properly communicated / escalated throughout the management chain commensurate with the potential seriousness of the situation.

It is the responsibility of all employees to report to the Asbestos Coordinator (AC) without delay if they observe or suspect an uncontrolled asbestos situation or a breach of the Asbestos Policy or AMP.

Appendix 3 contains an example of an incident form.

These reports, and all other incident reports made by any party, will be formally recorded in the first instance by the AC in the Health and Safety Register in order that timelines, progress and communications may be tracked. The AC will be responsible for maintaining the log, irrespective of who takes 'ownership' of any subsequent investigation.

Where a formal investigation is deemed appropriate by the ARP, this shall address, as a minimum:

- The immediate causes;
- Any contributory causes;
- Faulty equipment or control measures;
- Policies or other arrangements broken by any member of staff or third party;
- Required involvement from external specialist to properly address risks or technical breaches
- Necessary corrective action and required reviews of policies and procedures.

The participants in the investigation may take photographs, interview other employees and use the full range of appropriate information gathering techniques available at the time of the investigation.

Where damage to any material known or suspected to contain asbestos has taken place and is likely to give rise to airborne fibre release, the AC has responsibility for arranging the isolation of the area pending investigation. In most cases, the involvement of an external consultancy will then be sought as part of the investigation.

Where possible personal exposure situations have occurred or other incidents in which significant asbestos fibre release has been deemed a possibility, a competent external Consultancy specialising in asbestos exposure analysis will be commissioned to carry out a scientific and properly justified assessment of the probable/possible health risks. An 'After the Event' (ATE) report will be sought, based on the Consultant's professional experience

along with relevant medical-scientific research on dose-response relationships to pronounce on the **real** risk associated with the incident, any failures on the part of Ark and any required remedial action.

All reportable 'dangerous occurrences' (note that advice should be sought from a competent person to determine whether an incident is in fact reportable) will be reportable under Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR).

At the conclusion of each investigation, the Health and Safety Register will be updated, by the AC and/or ARP, with all relevant details of the incident, its investigation and reporting and actions taken

The Health and Safety Register will be regularly reviewed (e.g. as part of internal auditing) to identify trends and the requirement for further actions to reduce the likelihood of reoccurrence and/or similar events.

4.3 Tenant Communication

Ark's position is that the provision of general information to tenants on the possible presence of asbestos within their properties is good practice.

The provision of specific asbestos information to domestic tenants as a matter of course (e.g. the widescale sharing of asbestos survey reports), other than where there is clear evidence that ACMs are present in such a condition as to present a significant health risk, is deemed to be inappropriate, potentially misleading (where tenants do not understand the criteria and limitations of surveys) and possibly unnecessarily alarming.

However, where ACMs are identified (in common areas and/or within domestic dwellings) in such a condition as to present a significant or imminent health risk, relevant tenants would be informed without delay, along with plans for any remedial action and a timescale for the remediation. The AC would be responsible for collating the information required and the ARP would take responsibility for managing the tenant relations procedure, utilising assistance from other Ark personnel and/or third parties as appropriate.

5.0 Implementation and Review

The ARP will arrange for all asbestos arrangements, including the policy and this AMP to be audited and reviewed at least once every 3 years. It is a legal requirement to review an AMP at least annually.

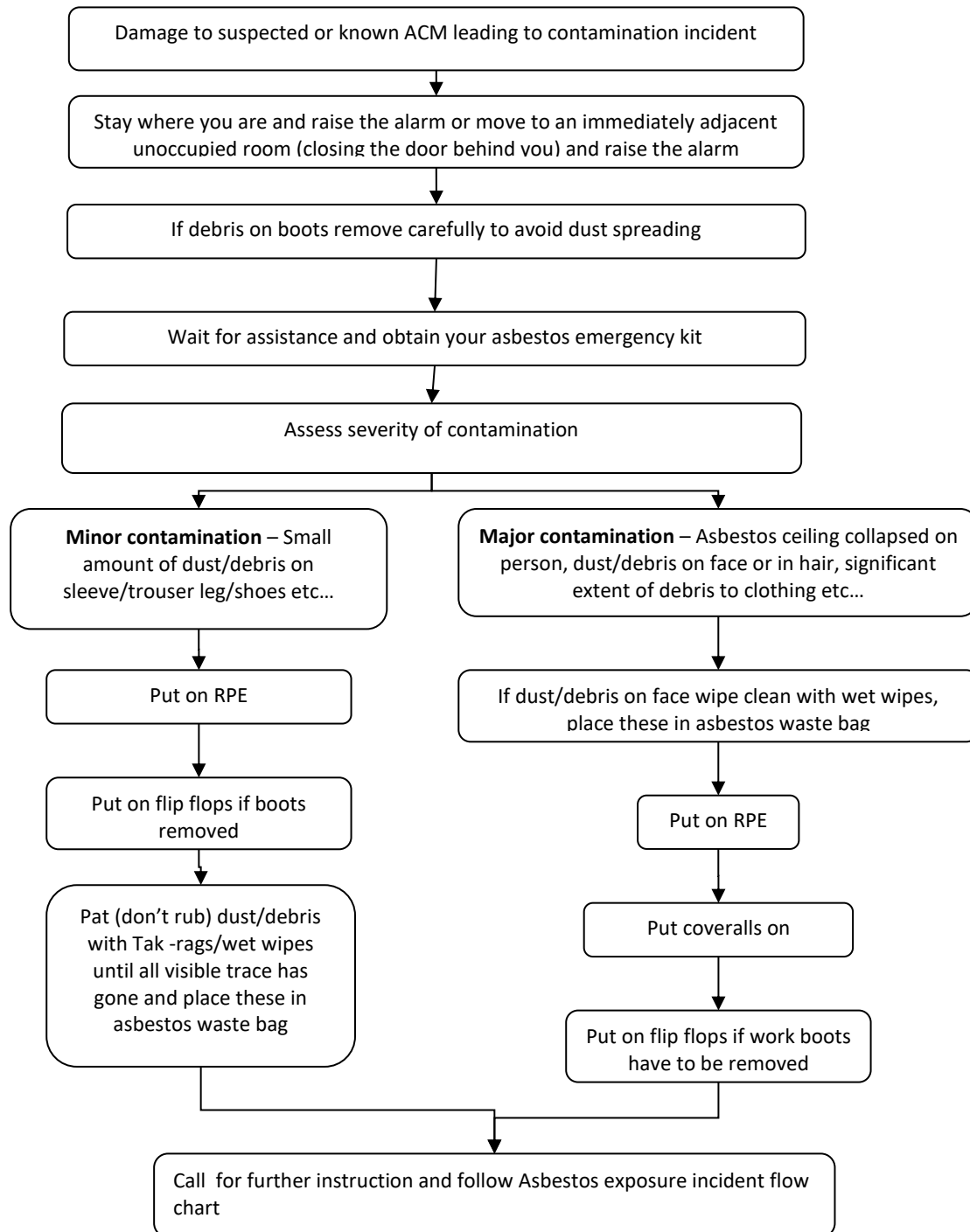
The audit / review may be conducted by an audit 'team' and may involve the use of an external consultant. However, the ARP will deem the auditor(s) competent and appropriate to cover the full range and reach of the AMP.

The audit / review will take account of all policies and procedures, roles and responsibilities, asbestos information systems, competency and training system, incidents and records associated with work on premises (planned and reactive) and asbestos related works.

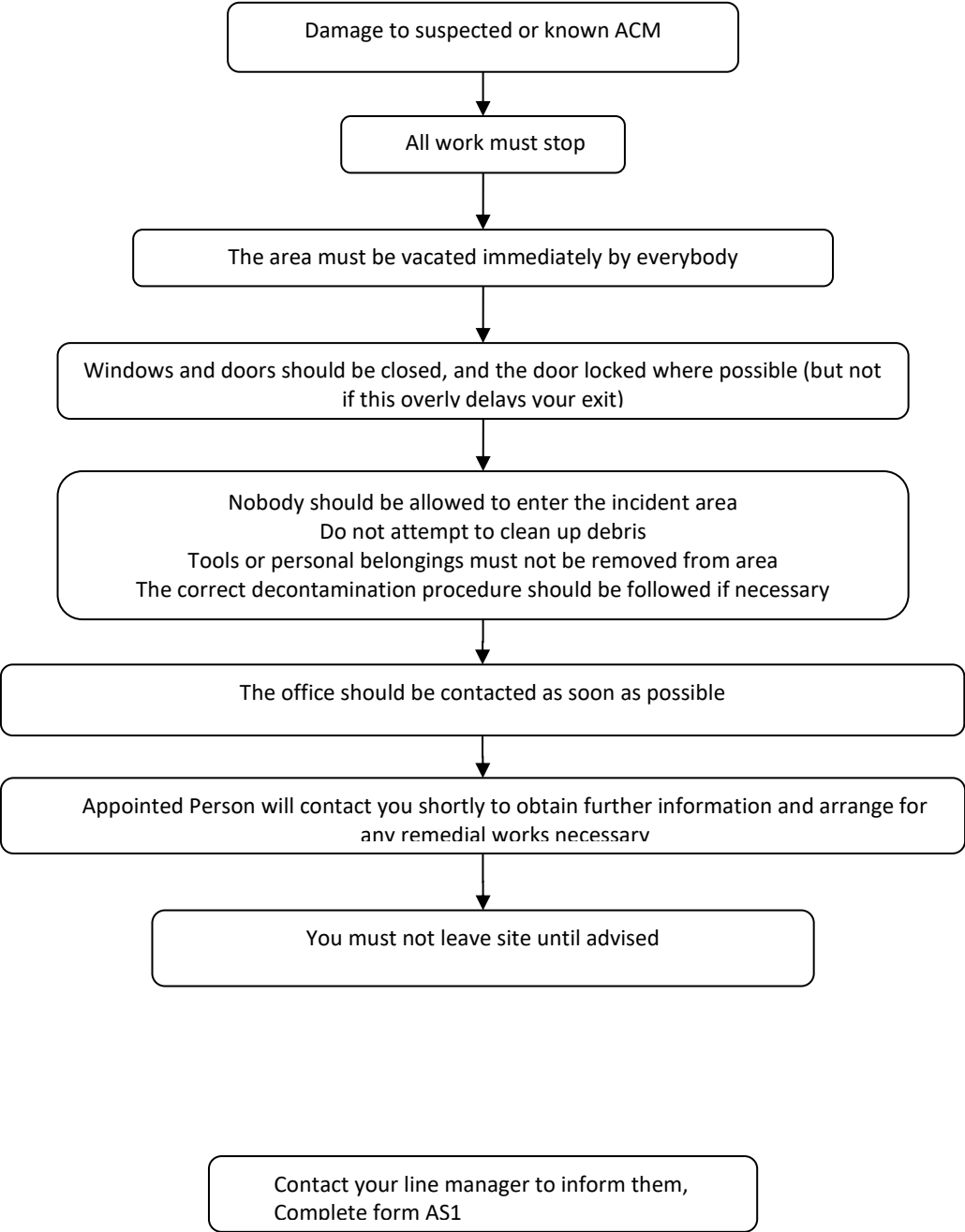
A written report will be prepared detailing the findings of the audit / review, highlighting non-conformances and/or areas for improvement and making recommendations and suggestions. The ARP will make the report available to the Chief Executive.

Appendix 1 – Emergency Procedures

1 – Asbestos Decontamination Process



2 - Exposure Incident Flowchart



Appendix 2 – Asbestos Incident Form

ASBESTOS INCIDENT FORM		
Incident no.		
IN THE FIRST INSTANCE CONTACT THE [INSERT RESPONSIBLE PERSON]		
<i>THIS FORM IS TO BE COMPLETED BY THE PREMISES MANAGER (DUTYHOLDER OR APPOINTED PERSON) FOLLOWING ANY ACCIDENTAL OR POTENTIAL RELEASE OF ASBESTOS FIBRE AND RETURNED TO THE ASBESTOS MANAGER WITHIN 7 SEVEN DAYS OF THE INCIDENT BEING CLOSED AND/OR THE AREA BEING RE-OCCUPIED</i>		
RETURN TO:		
[INSERT RETURN DETAILS]		
SITE ADDRESS:		NAME (Print Name)
ROOM NO. S / AREAS AFFECTED:		
DETAILS OF INCIDENT:		
ANTICIPATED EXPOSURE:		
DATE & TIME OF INCIDENT:		
CONTROL DETAILS		
AREA ISOLATED:		
PERSONNEL RECORDED:		
CONTAMINATED CLOTHING REMOVED:		
CONSULTANT/LARC DETAILS	DATE OF VISIT:	TIME:
NAME OF APPOINTED ORGANISATION:		
ON SITE REPRESENTATIVE:	CONTACT TEL NO.	
INITIAL FINDINGS:		
ANALYSIS FINDINGS - Confirm Asbestos or Non-Asbestos		
NAME OF ANALYST	CONTACT TEL NO.	
RESULTS		
DATE INFORMATION RECEIVED		
REMEDICATION DETAILS -	LICENSED WORK -	YES OR NO
NAME OF CONTRACTOR	CONTACT TEL NO.	
DATE WORKS COMMENCED:		
DATE WORKS COMPLETED:		
FOR COMPLETION BY [INSERT RESPONSIBLE PERSON]		
POSITIVE SAMPLE REQUIRING NOTIFICATION UNDER RIDDOR	YES OR NO	
DATE OF CONTACT TO HSE HOTLINE TEL. No 0845 3009923	DATE	
HSE RIDDOR INCIDENT NO.	NO.	
EMPLOYER OF NON-STAFF NOTIFIED	DATE	
RECORD OF EXPOSURE COMPLETED FOR EXPOSED STAFF BY LINE MANAGER	DATE	
FEEDBACK REQUIRED TO DIRECTORATE HEALTH & SAFETY TEAM	YES OR NO	
FILE REVIEWED AND CLOSED BY; SIGNED	DATE	

Appendix 3 – Roles and responsibilities

The following summarises the Ark's organisational structure which facilitates a cascading of asbestos responsibilities down through the management chain to ensure those with the most appropriate daily operational functions can manage, supervise and physically carry out asbestos related control measures as appropriate.

Defined Roles

The AMP details the actual tasks for which the key identified staff are responsible, as well as operational procedures in respect of these tasks. As such, all relevant staff should be fully familiar with their roles and responsibilities set out in the AMP.

Role Title	Delegated to
Director of Service Duty Holder	Director of Development and Business Experience
Asbestos Responsible Person	Asset and Compliance Manager
Asbestos Co-ordinator	Asset Compliance and Contracts Officer
Works Duty Holders	Any Ark employee instructing invasive works
Employees	Any member of staff, other than those defined elsewhere, who has a specific role or responsibility under the Asbestos Policy and AMP
Contractors	See approved contractor list
Asbestos Contractors	See approved contractor list
Asbestos Consultants	External consultancy

The Director of Development and Business Experience will hold ultimate accountability for asbestos compliance, ratify and endorse the Asbestos Policy and the AMP and will appoint a suitable and competent Asbestos Responsible Person (ARP) to manage this AMP.

The Director of Development and Business Experience will give due consideration and will make available all reasonable support as may be required to reports received from the ARP in relation to asbestos risk management and/or compliance with the Asbestos Policy and AMP.

The Director of Development and Business Experience will make available all reasonable resources to the ARP for the undertaking of their duties under the Asbestos Policy and AMP and will ensure adequate lines of communication with the ARP and will take all reasonable steps to comply with all reasonable requests and issues raised by the ARP.

The Director of Development and Business Experience will review the findings of all internal and external asbestos audits and of any investigations into reported asbestos failures and

will authorise the use of all reasonable support required to rectify any significant non-compliances. They will also inform the Chief Executive of all high-level compliance breaches or other governance issues requiring such a level of seniority involvement without undue delay.

Asbestos Responsible Person – Asset and Compliance Manager

The ARP will be responsible for the practical delivery and implementation of the Asbestos Policy and AMP and for identifying / authorising amendments and modifications for continual improvement. Where appropriate, suggested amendments will be escalated to the Chief Executive without undue delay.

The ARP will 'line manage' a suitable and competent Asbestos Co-Ordinator (AC) to deliver the responsibilities set out for that role. The ARP will ensure that the AC has relevant training to enable them to discharge all asbestos related duties.

The ARP will provide all reasonable support (as expected of a senior manager) to the AC to ensure his/her duties may be performed accurately and timeously. This may involve the authorisation of additional support and resources.

The ARP will ensure adequate lines of communication with the AC and will take all reasonable steps to comply with all reasonable requests and issues raised by the AC.

The ARP will escalate all significant compliance breaches, non-conformances, policy breaches and other material events to Chief Executive without undue delay.

The ARP will take all reasonable steps to deal with Asbestos related emergencies, uncontrolled risks and required actions brought to their attention.

The ARP will be responsible for Periodically reviewing the effectiveness of the Asbestos Policy and AMP.

Asbestos Co-ordinator – Asset Compliance and Contracts Officer

The AC will be responsible for the following aspects of the Asbestos Policy and AMP.

Maintaining the day-to-day activities required to deliver an effective asbestos management strategy across Ark, as detailed throughout the Asbestos Policy and AMP.

Assisting the ARP to review and update the Asbestos Policy and AMP and report on its effectiveness to the Heads of Services, Chief Executive and other interested parties.

Developing and maintaining an Asbestos Register of properties built before 2000. This will also include:

- a general over-arching responsibility for the Ark asbestos surveying strategy (for normal occupancy and works-related risk), delivery of the strategy and updating of the Register as appropriate
- timeous updating of the Register whenever ACMs are identified / re-inspected / removed / remediated / etc.
- ensuring that adequate reviews of known asbestos containing materials ('Reinspection's') are carried out by competent persons and that the Register is updated accordingly.
- organising regular audits of the Register.

Providing Ark staff and contractors with all appropriate asbestos information and details of asbestos management expectations under the Asbestos Policy and AMP and maintaining a record of all information sharing and governance issues.

Providing information to interested parties on asbestos containing materials, and the organisation's Asbestos Policy and AMP, as appropriate. This will include providing the Enforcement Authorities with details of asbestos management procedures if requested.

Reporting any incident of alleged asbestos exposure and carrying out any required investigation, with the support of the ARP. Also, where appropriate, ensuring the correct reporting of incidents under RIDDOR (Reporting of Injuries, Diseases and Dangerous Occurrences Regulations).

Promoting awareness of the hazards of asbestos containing materials and the organisation's asbestos procedures by advising on and assisting with appropriate training and knowledge transfer.

Monitoring the implementation of the Asbestos Policy and AMP and adherence to the defined procedures to ensure that Ark staff and contractors are aware of, and demonstrably comply with, their respective responsibilities.

Maintaining a current list of approved asbestos contractors (HSE Asbestos Licensed Contractors and Minor Works Contractors) and UKAS accredited asbestos testing/survey organisations and disseminating this information and any amendments) to Works Duty Holders as appropriate.

Works Duty Holders

A Works Duty Holder is defined as:

'Any member of staff, other than those defined elsewhere, who has a specific role or responsibility under the Asbestos Policy and AMP'.

If any work is to be carried out in properties built before the year 2000, **which will interfere with the fabric of the building** then certain staff members have specific responsibilities in relation to the planning, co-ordination, management and monitoring of that work. These job roles all include an asbestos risk management element, and, by definition, the staff members involved will be classed as 'works duty holders.

Such job roles will include, but will not be limited to:

- Housing and Neighbourhood Services Officer
- Asset Compliance and Contracts Officer
- Asset Officers
- Customer Services Officer
- Housing and Customer Services Manager
- All personnel carrying out property inspections, visits and other site-based activities

Individual sections each set out a range of specific responsibilities of works duty holders for different works scenarios and all personnel should be fully familiar with, and suitably trained in, the relevant procedures.

In general, all works duty holders will recognise the availability of, and specialised competencies held by the ARP and AC in relation to the management of asbestos works and will ensure proper communication and cooperation is maintained throughout all relevant projects.

If any doubts arise over the safety of a situation or the correct procedure to be followed in respect of asbestos, the ARP or AC should be contacted without **delay. Works Duty Holders**

Employees

All persons working within Ark will be responsible for:

- Ensuring that any work that may disturb or damage known or suspect asbestos containing materials is avoided.
- Preventing any work on, or intentional damage to, building fabrics unless the possibility of asbestos being present has been adequately addressed.
- Reporting any materials suspected of containing asbestos, where the material has become disturbed and/or damaged,

General Contractors and Subcontractors (non-asbestos)

All contractors will be required to:

- Ensure and demonstrate that they are fully familiar with current legislation relating to the management of Asbestos Containing Materials.
- Ensure that they have a clear understanding of the Organisation's Asbestos Policy and Procedures.
- Ensure that all staff to be utilised on the contract have received an appropriate level of asbestos awareness training (UKATA Asbestos Awareness – or equivalent - as a minimum).
- Consult with any relevant asbestos registers / survey reports that may be available for establishments **before** work progresses (ensuring the appropriate type of survey has been carried out)
- Ensure that where work may be affected by, or involve, asbestos containing materials that an approved licensed/competent (depending upon the category of asbestos work) sub-contractor is engaged (unless the contractor itself is licensed/competent and approved by the Organisation) to carry out the work. This will also require liaison with the relevant Works Duty Holder who will be responsible for commissioning the independent asbestos testing company or Asbestos Project Manager if required.
- 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 Works Duty Holder or AC for further instruction.
- Contractors must ensure that Asbestos sub-contractors are approved by the Organisation before any order is placed or contract awarded and that all Plans of Work are approved by the Organisation.

Asbestos Removal Contractors and Subcontractors

- Asbestos Removal / Remediation contractors will be responsible for:
- Ensuring that they have a current license from the HSE to work with the relevant type of asbestos or can demonstrate competence where non-licensed work is concerned.
- Ensuring that they have current and adequate insurance cover for the asbestos works to be undertaken.
- Ensuring working practises are following current legislation and all associated Approved Codes of Practice and Guidance Notes.
- Attending site to assess and prepare quotations against asbestos work specifications. The contractor must raise any issues relating to health and safety, or potential additional costs, on the project to the relevant Works Duty Holder.
- Attending site meetings as may be required, providing a written Method Statement and Risk Assessment (Plan of Work (POW)) to the Asset Officer ahead of the works starting. The POW must indicate the resources and timetable allocated to the project in accordance with *the Control of Asbestos Regulations 2012*. Emergency procedures

must be discussed before work commences. In addition, the following documentation will be provided to the organisation at the tender stage:

- a. current asbestos licence check against HSE website
 - b. insurance certificate indicating the insured is covered for asbestos work (licensed or minor)
 - c. medical examination certificates (conducted by an Employment Medical Advisory Service appointed doctor) for all personnel who will work on licensed jobs
 - d. evidence of training records for all personnel who will work on the job (Category B or C depending upon works classification)
 - e. where applicable, evidence of notification of the job to the HSE prior to commencement
 - f. Plans of Work prior to work commencing
 - g. Waste Consignment Notes
- Providing statutory notice to the Enforcing Authority as may be required prior to the commencement of any asbestos related works (e.g. 14-day Notification for licensed work) or applying for a waiver against the minimum notice period. Copies of all such notices must be submitted to the relevant Works Duty Holder or AC before work commences.
 - Carrying out their obligations under the contract, including maintaining high standards of safety and hygiene in asbestos works and all related work areas and supplying labour, materials and equipment of the highest standard, complete with all supporting documentation as may be required.
 - Arranging transport and disposal of asbestos waste materials in accordance with legislative requirements and providing copies of all Consignment Notes, Haulier's SEPA Registration and land fill site licence from SEPA without undue delay.
 - Carrying out regular inspections of the work environment. Any defects found, or any reported by the Organisation's representatives, must be immediately rectified.
 - Identifying to the relevant Works Duty Holder any additional elements of work which are to be agreed. The POW must be updated accordingly.
 - Liaising with the Organisation-appointed UKAS accredited asbestos testing organisation to ensure the satisfactory progress of the works.
 - Co-operating fully with any Asbestos Remediation Project Managers utilised by the Organisation.
 - Providing copies of all test certificates, Certificates of Reoccupation and evidence of correct waste disposal to the relevant Works Duty Holder (or Project Manager) within 10 working days.

Asbestos Analysts and Surveyors

It is important that Asbestos Analysts who carry out monitoring of airborne fibre levels and other site working conditions are completely independent of the Contractors. To ensure this the organisation, specifically the AC or ARP, must arrange separate contracts for each party.

Asbestos analysts, surveyors and consultants will be responsible for:

- Maintaining and demonstrating UKAS accreditation relevant to the requested task
- Maintaining adequate insurance cover for the tasks to be undertaken.
- Providing support to the Works Duty Holders and/or the AC as may be required.
- Reviewing and commenting on, when requested by a Works Duty Holder or the AC, asbestos works such as: specifications, Contractor's and/or Subcontractor's Method Statement, work procedures, etc.
- Carrying out analytical works and inspections as agreed with a Works Duty Holder or the AC. Where site conditions alter, the analyst will be required to amend the level of testing and inspections to ensure that all information relevant to the continued health and safety of the Contractor and building occupants is obtained.
- Reporting to the relevant Works Duty Holder or the AC any defect or non-compliance relating to the Contractor's and/or Subcontractor's performance, including suitability of the work area, adherence to the Method Statement, Statutory Instruments, and the Organisation's Asbestos Policy and Procedures. Where senior Organisation staff are not immediately available, the surveyor/analyst will be expected to take such measures as may be deemed necessary to ensure the health and safety of Contractors and Subcontractors and building occupants. These actions must be reported to the relevant Works Duty Holder or the AC as soon as reasonably practicable.
- 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 and 4-stage clearance procedures as may be required by law, a Works Duty Holder, or the AC, or as identified in the POW.
- Reporting to the relevant Works Duty Holder or the AC any aspects of asbestos management encountered on site which could give rise to health risks e.g. breaches of the Asbestos Policy and Procedures, suspect or damaged asbestos.
- Issuing formal reports, including Certificates of Re-occupation, to the relevant Works Duty Holder or the AC on completion of any site works.

Asbestos Remediation Project Managers

Asbestos Project Managers will be responsible for:

- Assessing the real risks associated with proposed asbestos works, scoping the works and preparing legally compliant and cost-effective removal/remediation works specifications.
- Tendering, or assisting a Works Duty Holder with tendering, the works to appropriate and competent contractors.
- Reviewing Plans of Work and liaising with the contractor to ensure legal compliance and compliance with the requirements of the Organisation.
- On-site project management, auditing, supervision, monitoring and testing to ensure safety and quality control and compliance with all legal requirements.
- Completion of a final site review to verify the suitability for the site for handover and the completion of works as agreed.
- Preparation of a project completion / compliance report for the Association's long-term protection against liability.

