



Clydebank Housing Association Limited

Policy & Procedures for the management of Asbestos Containing Materials

Housing Management/Maintenance Sub- Committee submission:	14 October 2014
Approved:	14 October 2014
Review date:	October 2017

This policy can be made available on request in a variety of different formats, such as on tape, in large print and translated into other languages.

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1.0 INTRODUCTION

- 1.1** Some buildings owned or occupied by Clydebank Housing Association were built or refurbished at a time when the use of asbestos containing materials in their construction was common. During work¹ it is possible that personnel could encounter asbestos.
- 1.2** The presence of an asbestos containing material in itself does not constitute a danger. However, there is a potential risk to health if such material is disturbed and damaged. An isolated accidental exposure to asbestos fibres for a short duration is extremely unlikely to result in the development of asbestos related diseases. However, regular exposure – even at relatively low levels – can present a risk. As well as people employed in the building trades, inadvertent exposure (and consequent risk) can occur in other groups of people e.g. installers of I.T. systems, burglar alarms, MMke detectors, etc.
- 1.3** Working with, and managing, asbestos materials is now very tightly controlled by a number of different Legislative Acts (See Appendix 1). Responsibility for ensuring compliance with these Acts has been delegated to the Maintenance Manager.

¹ *Work for the purposes of this document is deemed to include any activity that interferes with or disturbs the fabric of the building.*

2.0 ASBESTOS POLICY

2.1 Statement of Intent

It is the policy of Clydebank Housing Association to ensure that, as far as is reasonably practicable, no persons are exposed to risks to their health due to exposure to any asbestos containing materials that may be present in any of the properties it owns or occupies.

2.2 Policy Statement

The Housing Association's Asbestos Policy conforms with the Health and Safety at Work Act 1974 and the Control of Asbestos Regulations 2012. The Policy and Procedures will apply to all buildings and all individuals employed and/or engaged by the Housing Association **without exception**.

2.3 The Association Policy on asbestos is to:

- i) ensure the prevention of exposure to risks associated with asbestos containing materials.
- ii) ensure that any asbestos containing materials that may be present in any of its buildings are maintained in a condition so as to prevent the possibility of any harm to health occurring.
- iii) promote awareness of the risks from asbestos containing materials and the Association Management Procedures through training and induction of relevant staff.
- iv) provide adequate resources to ensure the provision of appropriate information, instructions and training.
- v) ensure a commitment to comply with all relevant asbestos legislation, Approved Codes of Practice, Health and Safety Executive Guidance Notes and to commit to the safe disposal of any asbestos waste in accordance with the appropriate legislation.
- vi) ensure that a 10% sample of each property type built before 2000 are surveyed to identify any asbestos containing materials that may be present therein and to prepare and maintain an Asbestos Register for all buildings. This Register will undergo regular reviews and will be updated after any treatment and/or removal works have been undertaken. Establishments will be risk assessed and programmed for surveys within three years, unless new legislation determines otherwise.
- vii) implement an effective asbestos management strategy in order that appropriate measures such as encapsulation, labelling, inspection, working with, or removal of, the material can be undertaken.
- viii) ensure that an appropriate system is installed, maintained and implemented for the management of all asbestos containing materials identified in the Register. Such a system is to be capable of recording the risk, the needs and priorities for treatment and/or removal.
- ix) ensure that all Contractors and Sub-Contractors engaged to carry out work on any of the Association's buildings are provided with a summary, listing all relevant premises that may contain asbestos which may be disturbed by their works, and are advised of the appropriate precautions and procedures to be followed.
- x) ensure that information regarding the presence of asbestos is contained in tender documentation as may be appropriate and that Contractors and Sub-

Contractors have in place Risk Assessments, Method Statements, etc. for its removal and/or management as appropriate .

- xi) ensure Contractors and Sub-Contractors shall not commence works without prior submission of their method statement to, and subsequent approval by, the Asbestos Co-ordinator or his designated representative.
- xii) ensure Licensed Contractors and/or Sub-Contractors carry out all major asbestos works or removal of asbestos, in accordance with HSE recommendations and that where minor works are carried out by CHA approved contractors who are unlicensed, that they submit a method statement and comply with waste arrangements to the satisfaction of the Asbestos Co-ordinator.
- xiii) regularly review the Asbestos Management Policy and Procedures.

3.0 RESPONSIBILITIES

General

- 3.1 Clydebank Housing Association has responsibility for compliance with The Health and Safety at Work etc. Act. (1974) and all associated legislation. This includes specific legislation relating to asbestos, as set out in Appendix 1. This specific Asbestos Policy and Procedures document should be read in the context of the Association's Corporate Health and Safety Policy.
- 3.2 All Directors, Managers and any other employee of the Association undertaking or organising any work which might interfere with the fabric of any of the Association's premises will be responsible for ensuring that the Maintenance Manager is notified in advance of any intended works. This must be carried out by completing the '**Asbestos Permit to Work**' request form (see Appendix 2).
- 3.3 Senior Managers will ensure that all of their staff are familiar with the contents of this Policy and Procedures document, insofar as it is relevant to their roles and responsibilities.
- 3.4 Responsibility for the implementation of this Policy and Procedures document, along with the management of asbestos containing materials in premises will rest with the Maintenance Manager.

3.5 Asbestos Co-ordinator

The role of the Asbestos Co-ordinator is to be undertaken by the Maintenance Manager (MM) and ACS Environmental Services Ltd. (ACS)

3.5.1 They will be responsible for : -

- maintaining an effective asbestos management strategy, as detailed in this document, in order that appropriate measures are undertaken for labelling, inspection, working with, encapsulation or removal of asbestos materials. (MM)
- providing expert advice on asbestos materials and their treatment to those with responsibilities under this policy. (ACS)
- providing information on asbestos containing materials. (ACS)
- reviewing and updating as necessary this Policy and Procedures document. (MM)
- reporting any incident of alleged asbestos exposure to the Health and Safety Administrator and assisting with any investigation. (MM)
- assisting the Health and Safety Administrator in providing the Health and Safety Executive with details of asbestos management procedures if/when requested (MM & ACS)
- promoting awareness of the hazards of asbestos containing materials and the Association's Asbestos Management Procedures by advising on appropriate training and induction, in liaison with Administrative, Technical and Management staff. (MM & ACS)
- attending seminars, conferences etc. to ensure the Association remains at the forefront of best practice in asbestos management. (MM & ACS)
- assessing, reviewing and recommending management actions, following inspection findings, changes of legislation or current good working practice and

amending where necessary standards of work detailed in the general specification for work with asbestos containing materials. (MM & ACS)

- monitoring to ensure that Project Managers, Premises Managers and Staff are aware of their responsibilities under this policy. (MM)

3.5.2 They will be responsible for : -

- arranging samples to be taken of any suspected materials, in accordance with prescribed procedures, and arranging for the analysis of the samples by a test house with the appropriate UKAS (United Kingdom Accreditation Service) accreditation. (MM)
- programming surveys in the Association's premises to identify any asbestos containing materials that may be present and to prepare and maintain an Asbestos Register for each building. (MM)
- ensuring that adequate reviews of surveyed premises are carried out and that asbestos registers are updated accordingly. (MM)
- organising regular audits of the Asbestos Register. (MM & ACS)

3.5.3 They will be responsible for : -

- monitoring to ensure that only competent and licensed asbestos removal Contractors and Sub-Contractors are employed to carry out work with asbestos containing materials. (MM & ACS)
- ensuring all Contractors and Sub-Contractors have in place the necessary accredited/approved training on asbestos awareness and appropriate insurance cover. (MM & ACS)
- maintaining a current list of approved HSE Asbestos Licensed Contractors and UKAS accredited asbestos testing/survey organisations. (MM & ACS)
- ensuring that relevant Risk Assessments, Method Statements and Notices have been received, as may be applicable, prior to commencement of any works. (MM)
- monitoring Contractors and Sub-Contractors to assess their compliance with asbestos related statutory requirements. (MM & ACS)
- halting works where a contractor does not perform to the required standards or where the procedures contained within this document have not been followed. (MM)
- informing all staff, Contractors and Sub-Contractors as to the presence of any asbestos containing materials known to have been affected by the works. (MM)
- halting any works and informing staff if suspected materials are discovered during the course of any works. (MM)
- ensuring that the Asbestos Register is updated on completion of any works on asbestos containing materials. (MM)
- ensuring the proper disposal of asbestos waste material. (MM & ACS)
- ensuring that all asbestos identified as being safe to leave undisturbed is adequately recorded and where we have decided to do so, labelled.

3.6 Association Health & Safety Administrator

will be responsible for: -

- periodically reviewing the effectiveness of the Asbestos Policy and Procedures.
- reporting annually to the Housing Management & Maintenance Sub-Committee on the effectiveness of the Policy, Procedures and actual working practices.
- reporting immediately to the Management Committee if any serious deficiencies are identified in any areas of this document.

3.7 Health & Safety Administrator

will also be responsible for: -

- in conjunction with the Asbestos Co-ordinator, investigating and reporting to the Management Committee on any alleged incident of accidental asbestos exposure and also for ensuring correct reporting of incidents under RIDDOR, where appropriate.
- assisting the Asbestos Co-ordinator in providing the Health and Safety Executive with details of asbestos management procedures if/when requested.

3.8 Area Health & Safety Administrators

will be responsible for: -

- providing information on asbestos containing materials as may be required.
- ensuring that labelling of any known asbestos containing material, where we have decided to do so, is maintained in good condition (in conjunction with the Maintenance Manager).
- taking appropriate steps as may be required where existing means of access and escape are temporarily affected by asbestos working enclosures.
- the Asbestos Co-ordinator or his representative being alerted when any asbestos is found, or suspected, in order that an assessment can be made and appropriate action taken.

3.9 Planning Supervisor

The Asbestos Coordinator and/or the Project Manager may utilise the services of an Association approved Planning Supervisor. In this case, the Planning Supervisor will be responsible for:

- assessing, prior to work starting, the contractor's and/or sub-contractor's Method Statement, Risk Assessment(s), Notices and any other relevant documentation.
- notifying the Project Manager if satisfactory. The Project Manager will then authorise the start of work.
- notifying the Project Manager and the Asbestos Co-ordinator if unsatisfactory. The Project Manager will not allow the work to start until all problems have been rectified to the satisfaction of both the Planning Supervisor and the Asbestos Co-ordinator.
- preparing a summary report of the problems for the Asbestos Co-ordinator. This may subsequently be used during any future review of the list of Approved Contractors.

3.10 Premises Manager

All persons with responsibility for the management of any premises e.g. Tenants of Offices, Building Managers, have a duty in respect of those premises to ensure that: -

- all staff, students, service users, visitors and others who are likely to interfere with the fabric of the building are given the necessary information regarding this Asbestos Management Policy and Procedures to ensure that they are not put at risk of exposure to asbestos containing materials.
- ensuring that labelling of any known asbestos containing material, where we have decided to do so, is maintained in good condition (in conjunction with the Maintenance Manager).
- the Asbestos Co-ordinator or his representative is alerted when any asbestos is found, or suspected, in order that an assessment can be made and appropriate action taken.
- any measures deemed necessary by the Asbestos Co-ordinator or his representative are implemented.
- the Maintenance Manager is notified of any intended work, which may interfere with the fabric of any premises of the Association by completing the Authorisation to Carry out Work Request Form in line with these procedures. **No work must be allowed to progress until an 'Asbestos Permit to Work' certificate has been received (see Appendix 2).**
- any contractor, sub-contractor, member of staff or anyone else (paid or otherwise) carrying out any works on or within any building of the Association has consulted with, and obtained an authorisation to proceed from, the Maintenance Manager before work progresses.
- between periodic reviews by the Maintenance Manager, Maintenance Officers, Clerk of Works and Premises Managers/Administrators should carry out regular visual checks for damage to asbestos containing materials and record such inspections. If the condition has deteriorated the Maintenance Manager must be advised.

3.11 Association Employees

All persons employed by the Clydebank Housing Association will be responsible for:-

- ensuring that any work that may disturb or damage asbestos containing materials is avoided.
- reporting to their Premises Manager and the Maintenance Manager any materials suspected of containing asbestos where the material has become disturbed and/or damaged or where tenants, staff, Contractors and/or Sub Contractors are likely to undertake work, which may affect that material.
- notifying the Maintenance Manager of any intended work, which may interfere with the fabric of any premises of the Association by completing the Authorisation to Carry out Work Request Form in line with these procedures. **No work must be allowed to progress until an 'Asbestos Permit to Work' certificate has been received (see Appendix 2).**

3.12 Project Managers / Designers

will be responsible for:-

- ensuring that before any feasibility work is started on any project that the Maintenance Manager is consulted and information obtained on any asbestos containing materials within the premises. The Project Manager or his

representative along with copies of relevant documents must provide the detailed scope of the proposed scheme. A minimum of **6 weeks** must be allowed to enable surveys, sampling, analysis and reporting to take place.

- **ensuring that before any work is started on any Association premises that the Asbestos Register has been consulted.** If no asbestos is identified then the works can proceed with caution, bearing in mind the possible presence of asbestos containing materials not identified in the Asbestos Register.
- halting any works and informing staff if suspected materials are discovered during the course of the works and immediately seeking advice from the Maintenance Manager.
- ensuring that if asbestos is identified then the asbestos component of the work is correctly identified as “major works” or “minor works”.
- ensuring that the correct type of contractor is employed for each category of asbestos works and that relevant information is provided to Contractors and Sub Contractors on any asbestos containing materials within those premises.
- ensuring that only HSE asbestos licensed contractors and UKAS accredited testing organisations from the Association’s Approved List are used.
- ensuring that separate contracts are issued for asbestos remediation works and subsequent asbestos testing/monitoring.
- informing all relevant staff, Contractors and Sub-Contractors of the presence of any known asbestos, which may affect the works. Additionally, contractors are to be instructed to consult the Asbestos Register in order to familiarize themselves with the location of any known asbestos, non-accessible areas, or restricted areas in the premises
- ensuring that all Risk Assessments, Method Statements and Notices (as may be required under the Control of Asbestos at Work Regulations) are in place, and copies submitted to the Planning Supervisor for assessment, **before any work is allowed to start on site (see Section 3.9)**. Copies of all such documentation must be available for inspection on site at all times for the duration of any asbestos related works.
- permitting the works to start if the Planning Supervisor is satisfied with the quality of the documentation.
- not permitting the work to start, in the event of unsatisfactory initial documentation, until both the Planning Supervisor and the Asbestos Coordinator are satisfied with the modified documentation.
- advising the Asbestos Co-ordinator of the completion of any works to asbestos containing materials and providing such information as may be required in order that the Asbestos Register may be updated. This information must be supplied within 15 (fifteen) working days of the completion of the asbestos works.

3.13 General Contractors and Sub-Contractors

will be required to :-

- ensure 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 Association’s Asbestos Policy and Procedures.

- ensure that all staff employed by them have received an appropriate level of asbestos awareness training.
- consult with any relevant asbestos registers that may be available for establishments before work progresses.
- ensure that where work may be affected by, or involves, asbestos containing materials that an approved licensed sub-contractor is engaged (unless the contractor himself is licensed) to carry out the work.
- ensure that any relevant risk assessments, method statements, statutory notices are in place before work commences.
- to progress all works diligently but, if any suspect materials is encountered, to immediately suspend operations and to contact the Maintenance Manager for further instruction.
- provide copies of all test certificates, Certificates of Reoccupation, evidence of correct waste disposal to the Asbestos Co-ordinator within 10 (ten) working days of the completion of the work.
- **Asbestos Contractors must be vetted by the Asbestos Co-ordinator and approved by the Housing Management & Maintenance Sub-Committee before any order is placed or contract awarded.**

3.14 Asbestos Removal Contractors & Sub-Contractors

will be responsible for:-

- ensuring that they have a current license from the HSE to work with the type of asbestos indicated.
- ensuring that they have current and adequate insurance cover for the asbestos works to be undertaken.
- ensuring working practises are in compliance with 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 or sub-contractor must raise any issues relating to health and safety, or potential additional costs, on the project to the instructing officer/project manager.
- attending site meetings as may be required.
- providing a written Method Statement and Risk Assessments to the Project Manager and the Statutory Authority. The Risk Assessments and Method Statement must indicate the resources and timetable allocated to the project in accordance with the Control of Asbestos Regulations 2012. Emergency procedures must be discussed, and agreed, with the Asbestos Co-ordinator and the (Area) Health and Safety Coordinator before work commences
- providing statutory notice to the Health and Safety Executive as may be required prior to the commencement of any asbestos related works or, by agreement with the Project Manager, applying for a waiver against the minimum notice period. Copies of all such notices must be submitted to the Project Manager 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 to the Maintenance Manager.
- carrying out regular inspections of the work environment. Any defects found, or any reported by the Association's representatives, must be immediately rectified.
- complying with the Association's Policy specific to Authorisation to Work procedures and with all reasonable requests from the Maintenance Manager.
- identifying to the Maintenance Manager, or their appointed representative, any additional elements of work which are to be agreed. The Method Statement must be updated accordingly.
- liaising with the appointed UKAS accredited asbestos testing organisation to ensure the satisfactory progress of the works.
- providing copies of all test certificates, Certificates of Reoccupation, evidence of correct waste disposal to the Asbestos Co-ordinator within 10 (ten) working days.

3.15 Asbestos Analysts & Surveyors

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 Maintenance Manager as may be required.
- reviewing and commenting, when requested by the Asbestos Co-ordinator, on asbestos works such as: specifications, Contractor's and/or Sub-Contractor's Method Statement, work procedures, etc.
- carrying out analytical works and inspections as agreed with the Asbestos Co-ordinator. 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 Asbestos Co-ordinator, or his representative, any defect or non-compliance relating to the Contractor's and/or Sub-Contractor's performance, including suitability of the work area, adherence to the Method Statement, Statutory Instruments, and the Association's Asbestos Policy and Procedures. Where the Asbestos Co-ordinator is 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 Sub-Contractors and building occupants. These actions must be reported to the Asbestos Coordinator as soon as reasonably practicable.
- checking areas on completion of asbestos remedial works to ensure that the contractor has completed his scope of works and all affected areas have been left in a satisfactory condition.
- carrying out air monitoring tests as may be required by the Asbestos Co-ordinator, or his representative, or as identified in the Risk Assessment.
- reporting to the Asbestos Co-ordinator, and others as may be appropriate, 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 Maintenance Manager on completion of any site works.

4.0 PROCEDURES FOR DAMAGED, DISTURBED OR PREVIOUSLY UNIDENTIFIED ASBESTOS

- 4.1** It is the responsibility of all staff to report to the Maintenance Manager if they suspect that disturbed or damaged asbestos containing materials may be present in a building owned or occupied by the Association. The Maintenance Manager can be contacted via the Association Switchboard on **0141 941 1044** (Monday to Thursday 9.00am to 5.00pm and on Friday from 9am to 4.00pm). The Maintenance Manager will then give appropriate advice.
- 4.2** Where damage to any material known to contain asbestos has taken place, and is likely to give rise to airborne respirable fibre release, the Maintenance Manager will arrange for air monitoring tests (measurement of airborne fibre concentrations) to be carried out. Sampling and analysis will be carried out by an independent UKAS accredited organisation to determine the level of any potential contamination, or to provide reassurance that unacceptable contamination has not occurred.
- 4.3** Details of air test results will be made available for inspection & record purposes.
- 4.4** Remedial action will only be required when airborne fibre levels exceed 0.010 f/ml. The nature of the remedial work must be agreed with the Asbestos Co-ordinator.
- 4.5** When remedial action becomes necessary after exposure, the relevant facts may have to be reported to the HSE in accordance with the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR). The Safety Co-ordinator and/or the Asbestos Co-ordinator will advise on, and ensure compliance with, this requirement. Where damage occurs to materials which have not been confirmed as containing asbestos (prior to the completion of a survey and the issue of a register) but which the premise manager suspects may contain asbestos, then advice should be obtained from the Maintenance Manager as soon as possible after the incident.
- 4.6** Where a material is suspected of containing asbestos, the Premises Manager should request the Asbestos Co-ordinator to test the material.

5.0 PROCEDURES FOR FEASIBILITY STUDIES

- 5.1** Before any feasibility work is started on any major project the Maintenance Manager must be consulted and information obtained on any asbestos containing materials within the premises. The detailed scope of the Scheme as proposed must be provided by the Project Manager or his representative along with copies of relevant documents. A minimum of 6 weeks must be allowed to enable surveys, sampling, analysis and reporting to take place.

6.0 PROCEDURES FOR PROJECT AND OTHER PLANNED WORKS

- 6.1 **The Project Manager must interrogate the Asbestos Register before commencing any work that may interfere with the fabric of any Association owned or occupied building.** If no asbestos is identified then the works can proceed with caution, bearing in mind the possible presence of asbestos containing materials not identified in the Asbestos Register.
- 6.2 If asbestos is identified, which is likely to be disturbed by the works, then the asbestos component of the job must be correctly identified as “major works” or “minor works” and the appropriate type of contractor employed for each category. Only contractors approved by the Association may be employed.
- 6.3 Relevant information on any asbestos containing materials within the premises **should** be provided to Contractors and Sub Contractors at the ‘tender’ stage.
- 6.4 Contractors and Sub Contractors **must** be informed of the presence of any known asbestos which might affect the carrying out of the works before they commence. Additionally, contractors are to be instructed to consult the Asbestos Register in order to familiarise themselves with the location of any known asbestos, non-accessible areas, or restricted areas in the premises.
- 6.5 Separate contracts must be issued for asbestos remediation works and subsequent asbestos testing/monitoring.
- 6.6 Before any asbestos works start Risk Assessments, Method Statements and Notices (as may be required under the Control of Asbestos at Work Regulations) must be submitted to the Project Manager. These will then be submitted to the Planning Supervisor or Asbestos Co-ordinator for assessment. Work will be permitted to start if the Planning Supervisor or Asbestos Co-ordinator is satisfied with the quality of the documentation. Work will not be permitted to start, in the event of unsatisfactory initial documentation. In this case, work will only be allowed to start when both the Planning Supervisor and the Asbestos Co-ordinator are satisfied with the modified documentation.
- 6.7 Copies of all final documentation must be available for inspection on site at all times for the duration of the asbestos related works.
- 6.8 If suspected materials are discovered during the course of the works then the work will be immediately halted and staff in the vicinity informed. Advice must be sought immediately from the Maintenance Manager who may arrange for any necessary analytical work, air-monitoring tests etc. appropriate. The cost of any such action will be charged to the project.
- 6.9 The Asbestos Co-ordinator must be advised of the completion of any works to asbestos containing materials and provided with such information as may be required in order that the Asbestos Register may be updated. This information must be supplied within 15 (fifteen) working days of the completion of the asbestos works.

7.0 PROCEDURES FOR ROUTINE MAINTENANCE WORK

- 7.1** When a job request is received which involves work that will interfere with the fabric of an Association building, it is the Maintenance Manager's responsibility to interrogate the Asbestos Register to determine whether asbestos is present. If no asbestos is identified then the works can proceed with caution, bearing in mind the possible presence of asbestos containing materials not identified in the Asbestos Register.
- 7.2** If asbestos is present then the Maintenance Manager will determine, in conjunction with the Asbestos Co-ordinator, if the job can be carried out as "minor works".
- 7.3** If the job can be carried out as asbestos "minor works" then the Maintenance Manager must ensure that specialist, trained, staff are used and that the correct working procedures are adopted.
- 7.4** If the job must be carried out as "major works" the Asbestos Co-ordinator must be informed. In this case an Asbestos Licensed Contractor must be employed – chosen from the list described in Section 3.5.3.
- 7.5** The Contractor must notify the Asbestos Co-ordinator when any work involving asbestos is completed, in order that the Asbestos Register can be updated.

- 8.0 'ASBESTOS PERMIT TO WORK' PROCEDURES (See Appendix 2)**
- 8.1 Under no circumstances shall any work, which will, or may, interfere with the fabric of any Association building take place without prior consultation with, and authorisation from, the Maintenance Manager**
- 8.2** Asbestos Permit to Work procedures introduced in conjunction with this Policy and Procedures Document apply to all works that are **not** specified and monitored directly by the Maintenance Manager. These procedures will require Premise Managers/Project Managers to obtain written approval for any works which they propose to undertake that interferes with the fabric of any Association owned or occupied building.
- 8.3** Premises Managers/Administrators/Project Managers are required to:
- (i) undertake prior consultation with the Maintenance Manager regarding any works which may interfere with the fabric of the building. This includes those which may impinge on Planning, Building Regulations or any other statutory requirements. Where any works do infringe on such statutory requirements, then the Maintenance Manager will require copies of any approved documentation for record purposes.
 - (ii) submit a duly completed "Asbestos Permit to Work" request form and must ensure that it includes:-
 - (a) all information requested.
 - (b) a comprehensive description of the work, supported by material specifications, drawings or any other documentation sufficient to adequately describe the intentions.
 - (c) details of the time-scale of the project i.e. anticipated commencement / completion dates.
 - (d) where appropriate, details of the intended designer.
 - (iii) fully comply with the Association's Asbestos Policy and Procedures.
 - (iv) ensure that all work not involving asbestos based materials will fully comply with the Association Asbestos Permit to Work procedures, using compatible components or materials to ensure safe operation and function.
- 8.4** In order to monitor and audit compliance of the works, the Property Maintenance Section reserve the right to visit the premises, at any time, subject to normal premises operating procedures, and shall be afforded:-
- (i) access to all parts of the building.
 - (ii) access to records relating to the works undertaken.

RELEVANT LEGISLATION

The Health and Safety at Works etc. Act 1974 places general duties on employers and self-employed persons to ensure, so far as is reasonably practicable, the health, safety and welfare of all their employees, and persons other than their employees who may be affected by any of their undertakings. They must also ensure that the premises, and any plant or substance therein, are safe and present no risks. The regulations that have either been introduced under this Act, or introduced to implement the requirements of EC directives, and are relevant to the management of asbestos, are set out below.

Management of Health and Safety at Work Regulations 1999 requires an employer to assess and control risks to the health and safety of his employees and, for significant risk, to record the assessment. This would include the management of risks arising from asbestos.

Control of Substances Hazardous to Health Regulations 2002 apply to substances that are hazardous to health, including asbestos, and place specific responsibilities on employers, self-employed persons and employees. The regulations require a 'suitable and sufficient' assessment to be made of the risks and measures necessary to control substances hazardous to health arising from work. Employers are also required to maintain the control measures, monitor exposure of the employees to the substances and organise a health surveillance programme.

The Control of Asbestos Regulations 2012 – came into force on 6 April 2012, updating previous asbestos regulations to take account of the European Commission's view that the UK had not fully implemented the EU Directive on exposure to asbestos. In practice the changes are fairly limited. They mean that some types of non-licensed work with asbestos now have additional requirements i.e. notification of work, medical surveillance and record keeping. All other requirements remain unchanged as follows:

If existing asbestos containing materials are in good condition and are not likely to be damaged, they may be left in place; their condition monitored and managed to ensure they are not disturbed.

If you're responsible for maintenance of non-domestic premises, you have a "duty to manage" the asbestos in them, to protect anyone using or working in the premises from the risks to health that exposure to asbestos causes.

If you want to do any building or maintenance work in premises, or on plant or equipment that might contain asbestos, you need to identify where it is and its type and condition; assess the risks, and manage and control these risks.

The requirements for licensed work remain the same: in the majority of cases, work with asbestos need to be done by a licensed contractor. This work includes most asbestos removal, all work with sprayed asbestos coatings and asbestos lagging and most work with asbestos insulation and asbestos insulating board (AIB).

If you are carrying out non-licensed asbestos work, this still requires effective controls.

The control limit for asbestos is 0.1 asbestos fibres per cubic centimetre of air (0.1 f/cm³). The control limit is not a “safe” level and exposure from work activities involving asbestos must be reduced to as far below the control limit as possible.

Training is mandatory for anyone liable to be exposed to asbestos fibres at work. This includes maintenance workers and others who may come into contact with or disturb asbestos (e.g., cable installers), as well as those involved in asbestos removal.

What has changed:

From 6 April 2012, some non-licensed work needs to be notified to the relevant enforcing authority.

From 6 April 2012, brief written records should be kept of non-licensed work, which has to be notified e.g., copy of the notification with a list of workers on the job, plus the level of likely exposure of those workers to asbestos. This does not require air monitoring on every job, if an estimate of degree of exposure can be made based on experience of similar past tasks or published guidance.

By April 2015, all workers/self-employed doing notifiable non-licensed work with asbestos must be under health surveillance by a doctor. Workers who are already under health surveillance for licensed work need not have another medical examination for non-licensed work BUT medicals for notifiable non-licensed work are not acceptable for those doing licensed work.

Some modernisation of language and changes to reflect other legislation e.g., the prohibition section has been removed as the prohibition of supply and use of asbestos is now covered by REACH (Registration, Evaluation, Authorisation and Restriction of Chemicals Regulations 2006).

Construction (Design and Management) Regulations 1994 require the client to provide the planning supervisor with all relevant health and safety information about a project. This might include previous surveys of the building for asbestos. Not all projects are covered by the Regulations.

'ASBESTOS PERMIT TO WORK' PROCEDURES

Background

This document explains the procedures under which building occupants will seek authorisation from the Maintenance Manager (MM) for any work they plan to undertake, without MM supervision, which might disturb the fabric of the building.

These procedures do not apply to any work supervised by the MM

Authorisation Procedures

When staff, tenants or other building occupants plan to carry out any work which might disturb the fabric of the building the attached 'Asbestos Permit to Work' request form should be completed and submitted to the MM.

The MM will review the proposed work to determine whether it can safely be carried out without MM supervision. Under normal circumstances the MM will aim to process these requests within 5 (five) working days and issue a written response. No work should be commenced until it has been authorised, in writing, by the MM.

Assessment Criteria

The criteria listed on page two of the 'Asbestos Permit to Work' request form will be used to determine whether work can be undertaken without MM supervision. As a general guide work of a complex nature, which significantly interferes with the building fabric, or which requires any input from a contractor, will normally need to be supervised by the MM. In addition any project, which involves disturbance of asbestos-based materials or other hazards, affects fire safety or has any other legislative implications will also require MM supervision.

Carrying Out Authorised Works

When work has been authorised to proceed without MM supervision, it is important that, should any problem subsequently be encountered that was not originally identified, the project is referred back to MM for advice. Particular attention should be paid to the following areas: -

- **Asbestos** : The person responsible for supervising the work should be aware that the asbestos surveys are not 'intrusive' and does not, therefore, show details of any concealed asbestos-based materials. Should you have reason to believe that materials encountered whilst carrying out the work might contain asbestos they should be presumed to do so until proven otherwise. All work should cease immediately and the MM informed.
- **Buildings Structure & Engineering Services** : Should it prove necessary, when carrying out the works, to disturb the structure of the building or any engineering services, prior approval must be obtained from MM.
- **Fire Safety** : Under no circumstances should any work be carried out which interferes with fire detection systems, fire compartmentation or the means of escape from the building. The MM should be consulted should you have any doubts about the proposed works in relation to fire safety.
- **External Contractors/Consultants** : The MM must be advised where external contractors or consultants are required in order to undertake the proposed works.

ASBESTOS CO-ORDINATOR AUTHORISATION RECORD

(For Property Maintenance Dept. Use Only Please)

BUILDING & ENGINEERING

Asbestos identified in the working area?	YES / NO
Intrusive asbestos survey required?	YES / NO
Other hazards identified?	YES / NO
Structural implications?	YES / NO
Building fabric adversely affected?	YES / NO
Fire safety / means of escape affected?	YES / NO
Disability Discrimination Act non-compliance?	YES / NO
Electrical / IT systems affected?	YES / NO
Heating / ventilation affected?	YES / NO
Water / waste services affected?	YES / NO
Other piped services affected?	YES / NO

CONTRACT & FINANCIAL

Will contractors be used to carry out any part of works?	YES / NO
Will consultants or other specialist advice be used?	YES / NO
Will any materials be obtained from non-approved suppliers?	YES / NO

HEALTH & SAFETY

Will specialist risk assessment be required?	YES / NO
Will method statement be required?	YES / NO

*Maintenance staff should note that if the answer to any of the above questions is 'Yes' then the project should **not** be authorised to proceed & should be supervised by ESD.*

Authorisation Checks by:

Name :

Signed:

Date: