

## ASBESTOS MANAGEMENT POLICY

Staff roles listed in the **Competency Standards section** must be acquainted with contents of this document and have had documented instructions and training on its use. Authority to amend can only be undertaken by the **Process owner** with the relevant **Delegated approvals**.

For information on interpretations and instructions staff should contact the **Subject Matter expert** or **Process owner** and under no circumstances should any deviation be permitted without prior approval as above.

Document Controls			
<b>Version:</b>	7	<b>Effective date:</b>	June 2023
<b>Subject Matter expert drafter:</b>	Home Safety Specialist (Hazards)	<b>Process owner:</b>	Head of Property
<b>Related Pod</b>	Property	<b>Related Policy:</b>	Health & Safety Policy
<b>Review period</b>	3 Years	<b>Next review due by:</b>	March 2026
Delegated approvals			
<i>The 3 lines of defence have been checked within the framework and are valid</i>			<input checked="" type="checkbox"/>
<b>Approved by Director</b>	N/A	<b>Approved Date:</b>	XXX
<b>Approved by EMT</b>	Mark Haines Director of Property	<b>Approved Date:</b>	16 June 2023
<b>Approved by Board/ Committee/RRT</b>	N/A	<b>Approved Date:</b>	XXX
Competency Standards			
<b>Roles using this document</b>	Home Safety Specialist (Hazards) Home Safety Team Property Pod (Repairs)	<b>Mandatory training frequency</b>	12 months
<b>Associated legislation</b>	Control of Asbestos Regulations (CAR) 2012 Health and Safety at Work Act 1974	<b>Vocational training frequency</b>	1 x specialist training course & employees refresher training annually
<b>Consumer Standards</b>	Home Standard	<b>Other</b>	

<b>Lines of Defence</b>	
<b>Lines of Defence</b>	<b>Evidence</b>
<b>Lines of defence 1</b>	<ol style="list-style-type: none"> <li>1. Policy approved, with relevant cover sheet.</li> <li>2. All appropriate staff and Board briefed and trained on the policy, forming part of inductions for new staff.</li> <li>3. Assessment during 121 sessions.</li> <li>4. Reporting process for breaches of the policy.</li> </ol>
<b>Lines of defence 2</b>	<ol style="list-style-type: none"> <li>5. GROW team to provide exception report on training on monthly basis to Heads of Service and Policy Owner.</li> <li>6. Any breach of the policy reported to Company Secretary.</li> </ol>
<b>Lines of defence 3</b>	<ol style="list-style-type: none"> <li>7. Audit programme – audits will identify any housekeeping or recommended actions relating to non-compliance with all policies.</li> <li>8. Quarterly report to the Audit and Risk Committee.</li> </ol>

## 1. Purpose

- 1.1 The purpose of this policy is to confirm Red Kite's commitment to and arrangements for ensuring that the presence of asbestos within its' stock is managed effectively and safely. It recognises the statutory requirements which must be met. The health & safety of residents, visitors, staff and contractors is paramount and as such every reasonably practicable precaution shall be taken to protect such persons both collectively and individually.
- 1.2 The policy covers all Red Kite residential properties including general needs, sheltered housing, offices and any other locations and/or parts of buildings for which Red Kite has a responsibility for the management of asbestos containing materials (ACM's).
- 1.3 It is the policy of this organisation to prevent the exposure of our employees, contractors and any other persons to asbestos fibres. Where this is not possible, for example, during removal of asbestos containing materials, then it is our policy to reduce that exposure to the lowest level that is reasonably practicable. It is the responsibility of all relevant personnel to be familiar with the procedures contained within the Asbestos Management Policy to comply with the relevant procedures, current legislation, official guidance and good practice. In this way, we will ensure that the health and safety of all our staff and other persons is not put at risk from exposure to asbestos fibres.

## 2. Definitions

The following terms and abbreviations are used within this document, and are explained below:

ACMs	Asbestos-Containing Materials (throughout this document this may mean both known and presumed asbestos depending on the context in which it is used).
ACoP	Approved Code of Practice. AIB - Asbestos Insulation Board
ARC	Asbestos Removal Contractors
ASAC	Asbestos Surveying and Analysis Contractors
AMT	Asset Management Team (RKHA)
BOHS	British Occupational Hygiene Society
CAR 2012	Control of Asbestos Regulations 2012
CDM	Construction (Design and Management) Regulations 2015
HSE	Health & Safety Executive
MAS	Material Assessment Score
MTO	Maintenance Technical Officer
PAS	Priority Assessment Score
PPE	Personal Protective Equipment
PM	Project Managers
TM	Team Leader

UKAS United Kingdom Accreditation Service.

### **3. Responsibilities**

The duties of management, staff and personnel of Red Kite shall be clearly communicated and agreed by all parties to ensure that all persons can undertake their duties as stated in this policy. Communications and feedback detailing agreed responsibilities shall be kept and monitored by the Duty Holder who shall initiate further training or assistance as deemed necessary.

#### **3.1 The Board**

The Board is collectively and ultimately responsible for the implementation of the organisation's Asbestos Management Policy and has the responsibility to clearly delegate the authority to implement the policy to the Chief Executive Officer and ensure that the policy is adhered to.

#### **3.2 Executive Management Team**

The Chief Executive of Red Kite supported by the Executive Team has overall responsibility for implementing this policy and ensuring compliance. The Director of Property has particular responsibility for assisting the Executive team in this area. It is also their responsibility to monitor and review this policy. They are responsible for ensuring that the person who carries out the asbestos risk assessment is competent to do so. The Chief Executive needs to take all reasonable steps to ensure the competence of those carrying out work who are not under their direct control and that responsibilities and lines of communication are properly established and clearly laid down. The Chief Executive is responsible for ensuring adequate finances are secured for the delivery of this policy.

#### **3.3 Head of Property**

The Board has delegated their Duty Holder responsibility to the Head of Property, who has professional and technical responsibility for buildings owned and managed by the organisation. The Head of Property will be supported by a team of appropriately trained and qualified staff in undertaking the relevant duties. Please see Appendix 1 for an organisational chart.

The Asbestos Management Policy shall be controlled by the Head of Property, who will ensure that the asbestos management process is compliant with current legislation, to include annual reviews or special reviews following any circumstances outlined in the appropriate section below.

#### **3.4 Home Safety Manager**

The Home Safety Manager is accountable for:

- Ensuring compliance with the Asbestos Management Policy
- The overall strategy for the safe operation and execution of asbestos issues
- Managing the surveying and removals programme for the property portfolio and taking all reasonable steps to determine the location of ACMs
- Identifying and training personnel on the Asbestos Management Policy

- Keeping the Asbestos Register/database of ACMs up to date and providing a record of the location, condition, maintenance and removal for all ACMs plus undertake periodic checks of the accuracy of data
- Carrying out risk assessments and documenting actions taken to manage asbestos present
- Reporting any incidents to the appropriate parties (HSE, Board and Executive)
- Managing performance of both our appointed asbestos surveying and analysis and asbestos removal contractor
- Arranging independent quality checks and auditing of contractors and agreed processes
- Taking action to arrange repair, seal, removal, or otherwise treatment of ACMs, if there is a risk of exposure due to its condition and/or location
- Systematically monitoring the condition of ACMs, updating the Asbestos Register and reassessing the risk (at predetermined timescales)
- Making information available to those who may come into contact or disturb ACMs. Information shall be provided in a written or electronic format and shall be correct on the date it is presented
- Putting arrangements in place to make sure that work which may disturb ACMs complies with current legislation
- Ensuring that information is made available as required through the Asbestos Register, prior to the commencement of any works which may have the potential to bring staff into contact with ACMs, and that Refurbishment and Demolition surveys (or hybrid surveys) are carried out as required when extensive, intrusive works are required or no information exists on the asbestos register to acceptably manage risk

The Home Safety Manager will ensure training including asbestos awareness, is undertaken for appropriate staff and keep a competence matrix updated to ensure only those with appropriate training and information are asked to manage tasks where asbestos maybe encountered.

### 3.5 Home Safety Specialist (Hazards)

The Home Safety Specialist (Hazards), advise and take the lead in reacting to any emergency incidents under the guidance and supervision of the Duty Holder. They shall undertake the day to day management and co-ordination of management surveys, any required follow-up inspections, identified remedial works and maintain the Asbestos Register. They will also regularly check the asbestos register to ensure contractors are accessing this at suitable frequency.

Consult the asbestos surveying and analysis contractor for specialist asbestos advice where required, especially on:

- Prioritisation of re inspections, resurvey and actions
- Recommended/required actions on surveys
- Enforcement agency requirements/dealings

- Asbestos removal contractor behaviour/performance
- Quality of information held and on the asbestos database
- Ad hoc advice and guidance
- Administration of specialist works carried out under the Asbestos Surveying and Analysis contract and the Asbestos Removal contract

Consult the asbestos removal contractor for advice and information on:

- Actions taken to remedy asbestos incidents/situations
- Directions received from asbestos surveying and analysis contractor
- Validating information for recording on the asbestos register

### 3.6 **Employees**

To ensure the effective management of identified or presumed ACMs, all staff have a responsibility to co-operate with the Duty Holder and their appointed representatives in the management of all ACMs.

The following is a summary of their individual responsibilities:

- Reduce exposure, and prevent asbestos dust being released
- Carry out a suitable and sufficient risk assessment of all associated risks before starting any work
- Access and take account of relevant Asbestos Survey Reports on the database system prior to commencing any works or, request to see the Asbestos Survey Report held on site
- Comply with the requirements of this policy, if any doubt exists treat any material particularly insulation or insulating board as an asbestos containing material
- Stop works and enquire from the appropriate person if they suspect a material contains asbestos or are uncertain as to how to proceed
- Protect the health of themselves, their work colleagues and any other person if they think asbestos fibres have been released. Inform their supervisor immediately and make sure any contamination does not spread to affect other people
- Follow procedures set out by the Duty Holder and their team
- Follow the 'Safe System of Work' adopted by the Duty Holder and use safe work methods and appropriate equipment
- Control any items (belongings, carpets and soft furnishings etc.) they suspect may be contaminated with asbestos
- Ensure the safe system of work proposed from the risk assessments and plans are followed and updated with any discovered risks identified as works progress.
- Where other areas of the building are likely to be damaged undertake a suitable reassessment of the work.

Report all accidents, incidents and near misses to the Home Safety Specialist (Health & Safety) as quickly as possible after the event, to ensure that an investigation is undertaken.

### **3.7 Contractor Responsibilities**

Red Kite will only use approved licenced contractors to undertake removal works or where a licenced removal contractor is not required appropriately trained contractors will be appointed. Relevant qualified surveyors will be employed to undertake surveys etc. The Red Kite Guide to Health and Safety Control and Management of Contractors should be consulted for further information. Contractors are required to immediately report any asbestos related risks or concerns to Red Kite Managers and stop ongoing works until concerns have been addressed.

Contractors comply with relevant regulations and use information made available to them through this policy to assist them to adhere to our asbestos management framework.

Testing compliance with the requirements set out in the Asbestos Management Plan will occur through ongoing auditing and compliance.

Contractors are responsible for managing their own asbestos management procedures, training and records, and applying a safe system of work etc.

Contractors appointed to carry out both licensed and non-licensed works will be adequately vetted and required to submit relevant accreditations and a copy of their licence prior to commencing works. They must hold the required levels of insurance.

### **3.8 Resident Responsibilities**

This document is to be read in conjunction with current Tenancy Agreement conditions which state that residents are not permitted to make any material alterations to their home without the express formal written permission of Red Kite. Leaseholders are informed of their specific requirements in the Terms of Lease conditions.

## **4. Legal Framework**

The following legislation and regulations relate to this Policy:

- Health and Safety at Work Act 1974
- Management of Health & Safety at Work Regulations 1999
- Control of Asbestos Regulations (CAR) 2012
- The Construction (Design and Management) Regulations 2015
- The Control of Substances Hazardous to Health Regulations 2002
- The Carriage of Dangerous Goods (Classification, Packaging and Labelling) and Use of Transportable Pressure Receptacles Regulations.1996
- The Hazardous Waste (England and Wales) (Amendment) Regulations 2009
- Special Waste Regulations 1996
- The REACH Enforcement Regulations, 2008

Official HSE-issued Guidance documents:

- L143 – HSE Approved Code of Practice (ACoP) to CAR 2012
- HSG227 ‘A comprehensive guide to managing asbestos.
- HSG264 ‘Asbestos: the survey guide’
- HSG247 ‘The Licensed Contractor’s Guide’

## **5. Key Principles**

### **5.1 Statutory Inspection**

Under ‘The Control of Asbestos Regulations 2012’ (The Regulations), Red Kite has a duty to manage and monitor the condition of any asbestos containing materials (ACM’s), to the nondomestic stock (including the common parts of its assets) and workplaces.

Under the regulations, regulation 4, ‘The Duty to manage’ requires property owners to assess the condition and presence of asbestos in their stock annually.

Regulation 6 of the regulations, ‘Assessment of work which exposes employees to asbestos’ requires the Group to assess, identify and make aware to anyone working within our properties of the presence of asbestos prior to undertaking work. The regulation also requires the Group to manage any disturbance of ACM’s (by removal or encapsulation) any works may cause.

### **5.2 Management & Survey**

Where asbestos is identified or known as being present in a building, assessments will be undertaken to define the risks posed in accordance with HSE guidance documents HSG 264 and HSG 227. Where the ACMs are found to be in good condition and without risk to any building occupiers or users the general public, in accordance with HSE guidance the ACM will be left and managed in situ. The material condition of the ACM will be assessed and recorded annually within a ‘Management Plan’, for the relevant building.

Whenever any building alteration, refurbishment, demolition, routine maintenance activity, or any other works are to be undertaken, in relevant cases and before works commence the presence of any ACMs will be considered and where required if existing information is not sufficient or in the case of intrusive works appropriate testing and surveys will be carried out. Where ACM are suspected bulk sampling and testing of materials will be undertaken.

Prior to the commencement of any works Red Kite shall disclose to any contractor or service provider information relating to the presence of ACM’s within the building and workplace and make this information readily available.

Red Kite shall appoint a United Kingdom Accreditation Service (UKAS) registered provider to undertake all surveys, sampling and bulk analysis of any ACM in common parts and workplaces. Separate to this, Red Kite shall also appoint a HSE licenced service provider to undertake all removal and remediation work (encapsulation) of identified and known ACM’s.

## **6. Documentation & Records**



All management reports concerning the presence of and condition of ACM's to common areas and workplaces will be stored electronically and be retained for a minimum period of 2 years. Additionally, documentation relating to removal, disposal and air quality sampling after removal of ACM's, shall also be stored electronically and available for inspection by inspectors from the relevant enforcing authorities.

Where ACM's are removed following material condition reassessment, disturbance or its' removal, the asbestos register will be updated electronically. This is to be updated on a monthly and is owned by the Asset Manager.

## **7. Monitoring & Quality Assurance**

Red Kite will operate a robust quality assurance and monitoring system to ensure that all relevant certifications and documentation are accurate and up to date and that performance by a contractor or service provider is of a sufficiently high standard in order to ensure that the Landlords obligations are met.

## **8. Training**

Regulation 10, 'Information, instruction and training for all work with asbestos', requires employers to provide adequate training to its employees. All staff requiring asbestos awareness training will receive the necessary awareness training provision annually and/or as legislation concerning asbestos is updated. Training records from contractors will be requested periodically and internal staff training records maintained.

# Appendix 1 – Organisational Chart

