



Asbestos Management Policy

Reference	OP001	Version	3
Staff affected	All staff in Organisation	Issue date	July 17
Approved by	Head of Property	Review date	July 18
Lead officer	Compliance Officer		

1. Purpose

- 1.1 Red Kite Community Housing has a legal duty to ensure the health and safety of its employees, tenants, leaseholders and other stakeholders in relation to asbestos containing materials (ACMs). We will comply with this duty, by maintaining a robust asbestos management framework and safe systems of work.
- 1.2 Our legal duty extends to the manner in which we manage asbestos in properties under our control and protect those who may come into contact with ACMs.

2. References

- 2.1 The following regulations relate to works with asbestos. It is not an exhaustive list, but includes the main regulations to which all should adhere:-
- The Health and Safety at Work Act 1974, particularly Section 3: - General duties of Employers and Self-employed persons other than their employees.
 - The Control of Asbestos Regulations 2012 (CAR 2012)
 - The Construction (Design and Management) Regulations 2015
 - The Control of Substances Hazardous to Health Regulations 2002 (SI 2002 No. 2677)
 - The Carriage of Dangerous Goods (Classification, Packaging and Labelling) and Use of Transportable Pressure Receptacles Regulations.1996/SI 2092
 - The Hazardous Waste (England and Wales) (Amendment) Regulations 2009 (SI 2009 No. 507)
 - Special Waste Regulations, 1996 (SI 1996 No.972)
 - The REACH Enforcement Regulations, 2008 (SI 2008 No.2852)
- 2.2 Approved Codes of Practices
- L143 – HSE Approved Code of Practice (ACoP) to CAR 2012
- 2.3 Guidance Notes
- HSG210 Asbestos Essentials
 - HSG213 Introduction to Asbestos Essentials
 - HSG227 A comprehensive guide to managing asbestos in premises
 - HSG247 Asbestos: The Licensed contractor's guide
 - HSG248 Asbestos: The analysts' guide for sampling, analysis and clearance procedures
 - HSG264 Asbestos: The Survey Guide
 - MS31 Guidance for Appointed doctors on the Control of Asbestos Regulations 2012 –medical surveillance - licensed asbestos works

3. Policy Statement

- 3.1 Our primary method of control regarding asbestos management is to use an assessment of risks to determine a relevant course of action within an agreed hierarchy of:-
1. Record and Manage
 2. Seal
 3. Encapsulate
 4. Remove

3.2 We will not undertake any work to a property we manage without first obtaining adequate information on the nature, condition and extent of any ACMs present, presumed, or that are likely to be disturbed. We will also ensure that any work carried out to ACMs will only be undertaken by competent, fully trained and accredited contractors. Furthermore we will take all reasonable measures to mitigate the risk of inadvertent or accidental release of asbestos fibers through all work activities.

3.3 We will:-

- Ensure that all materials in communal areas likely to contain asbestos are identified and regularly inspected
- Take reasonable steps to ensure that materials in domestic dwellings likely to contain asbestos are identified where practicable to do so
- Maintain an up-to-date written record of the location, condition, extent and nature of all known and presumed asbestos containing materials
- Carry out on-going monitoring of the condition of ACMs and, on a basis of risk, encapsulate or remove the materials as and when appropriate
- Maintain a Management Plan for all premises where ACMs are present and ensure that these are monitored, audited and reviewed regularly
- Inform tenants, leaseholders, staff and other building users of the nature and extent of any known or suspected ACMs
- Properly manage and record asbestos within domestic dwellings and fully comply with our legal 'Duty to Manage' requirement of asbestos within communal areas

4. Asbestos Management Policy

4.1 This policy forms part of Red Kite's management framework for the control and safe management of asbestos materials. Additional information relating to our management framework includes:

- a) Asbestos Management Plan
- b) Asbestos management procedures
- c) Asbestos guidance for contractors
- d) Asbestos information for tenants
- e) Asbestos contracts
- f) Asbestos Register
- g) Asbestos archetype methodology
- h) Flow charts identifying relevant control and management processes
- i) Emergency procedures and incident plan

4.2 Procedures clearly set out operational activity regarding the management of asbestos and methods used to conform to current legislation and guidance.

5. Roles and Responsibilities

5.1 Chief Executive

The Chief Executive and ultimately the Board has overall responsibility for the Asbestos Policy but delegate actions to the Duty Holder and other responsible staff as detailed in the Asbestos Management Plan. These actions also relate to contractors acting on behalf of Red Kite. Key actions are set out below;

- Maintaining an up to date asbestos register
- Ensuring adequate resources are allocated to managing the risks associated to asbestos
- Ensuring adequate processes and procedures are in place to manage the risks arising from asbestos.
- Ensuring information, instruction and training is carried out
- Monitoring the performance of staff and contractors
- Ensuring that members of the public, staff and contractors are not unnecessarily exposed to risk
- Ensuring appropriate risk assessments are undertaken and that regular review is carried out
- Ensuring appropriate inspections are made to assess the condition of ACMs

5.2 Deputy Chief Executive

The Deputy Chief Executive will assist and deputise for the Chief Executive and are responsible for the overall effectiveness of the Asbestos Management Policy. In doing so they are required to;

- Ensure adequate resources are allocated to manage risk arising from asbestos
- Monitor the performance of their subordinates against the policy
- Advise the Chief Executive of any problem arising in connection with the management of risk

5.3 Asbestos Plan Manager

The Head of Property shall serve as the Asbestos Plan Manager 'Duty Holder' and be responsible for the strategic management of asbestos control within Red Kite, reporting directly to the Assistant Director of Operations and shall:

- Formulate and revise Red Kite policy
- Formulate and revise the Asbestos Management Plan
- Facilitate audits to ensure that the provisions within the Management Plan are being enforced to the standard required
- Ensure that the asbestos register is maintained and up to date
- Ensure asbestos related accidents and incidents are reported, investigated and controls introduced to reduce the risk of such accidents recurring
- Ensure risks arising from asbestos related activities are recorded reviewed and mitigated
- Ensure adequate training is maintained to effectively manage risks arising from the control of ACMs
- Appoint a designated deputy (Assistant Compliance Manager – Responsible Person) to provide cover in their absence
- Coordinate internal resources and ensure adherence to the agreed safe systems of work
- Maintain an up to date knowledge of legislative requirements and best practice and ensure all relevant staff receive adequate information,

instruction and training. This includes the provision of regular refresher training to maintain skills

5.4 Assistant Compliance Manager – ‘Responsible Person’
The ‘Responsible Person’ with the support of the Technical Officer – Compliance or the appointed specialist consultant is responsible for the day to day running and implementation of the Asbestos Management Plan and they will:

- Provide advice on the application of this policy on an individual case by case basis
- Ensure that the required information from asbestos related work is fed back to the appropriate manager
- Ensure that the asbestos register is maintained and up to date
- Ensure that communal areas within the stock are monitored in accordance with legislative requirements
- Provide asbestos related information to staff, contractors, tenants and members of the public as required
- Ensure adequate training is maintained organisationally and in accordance with current regulations
- Appoint a designated deputy as appropriate to provide cover in their absence
- Ensure information regarding asbestos is readily made available to contractors they are responsible for

6. **Employees**

6.1 All Employees, irrespective of their position shall:

- Take reasonable care for their own health and safety and that of other persons who may be adversely affected by asbestos works, including members of the public, tenants, visitors and contractors
- Co-operate as appropriate with other staff and agencies to ensure compliance with this policy and all other legal requirements
- Halt works that, in their opinion, may present a serious risk to health and safety
- Report any concerns that they may have in relation to the management of asbestos

7. **Tenants and Leaseholders**

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

8. **Contractors**

8.1 This policy is to be read in conjunction with Red Kite’s Code of Conduct for Contractors. Contractors are required to immediately report any asbestos related risks or concerns to Red Kite Managers and stop ongoing works until they are satisfied their concerns have been addressed.

- 8.2 All contractors will 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 will occur through ongoing auditing and compliance with their own internal quality control systems.
- 8.3 Contractors are responsible for managing their own asbestos management procedures, training and records etc.
- 8.4 Contractors appointed to carryout both licensed and non-licensed works will be adequately vetted and required to submit relevant accreditations and licenses prior to commencing works. They will also hold the required levels of insurance.

9. Communication

- 9.1 Red Kite will communicate widely on asbestos related guidance and good practice. We will issue general information to all new tenants and regularly inform tenants and leaseholders on good practice through the use of leaflets and updates in newsletters. Each tenant will have access to asbestos related information relevant to their home by logging into an asbestos database, hosted on the organisation's website using a unique property reference number.
- 9.2 We will liaise with external emergency services to minimise the potential risks that could arise from activities, where ACMs could become disturbed when dealing with emergency situations within properties that we manage.
- 9.3 Right to buy applicants will be informed of the locations and precautions regarding asbestos when they first apply to buy the property. This information is to be included within the 'Offer Notice' issued to all right to buy applicants.

10. Asbestos Training

- 10.1 We will ensure that adequate information, instruction and training is given to all employees. Asbestos awareness training is a mandatory requirement under regulation 10 of the Control of Asbestos Regulations 2012. All relevant staff will attend a suitable training course on an annual basis.
- 10.2 All relevant staff will be trained on the contents of our Asbestos Management Plan and this policy on an annual basis.

11. Review

- 11.1 This Policy shall be reviewed and updated by the Asbestos Plan Manager on an annual basis or, if there are any significant changes to current Asbestos Legislation, HSE approved codes of practice or guidance. It will also be reviewed after any serious asbestos incident or if any reason comes to light to suggest that the Plan or Policy is inadequate.

12. Equality and Diversity

- 12.1 All involved will recognise their ethical and legal duty to advance equality of opportunity and prevent discrimination on the grounds of; age, sex, sexual orientation, disability, race, religion or belief, gender reassignment, pregnancy and maternity, marriage and civil partnership.

12.2 Communications and documentation will be translated or interpreted as required and provided in accessible formats such as large print or Braille according to customers' needs

13. Publicising this Policy

13.1 Policy and procedures relating to asbestos safety will be publicised widely and specific details included in the following documents

- Tenant Information Pack
- Asbestos Safety Leaflet
- Tenant and Leaseholder Newsletter
- Our Website
- Policy Briefings
- Training briefings
- Contact management meetings

13.2 We will take every opportunity to promote the importance of asbestos safety.