



# Group Asbestos Management Policy

<b>Version:</b>	<b>4</b>	<b>Approved by:</b>	<b>EMT</b>
<b>Effective Date:</b>	<b>17<sup>th</sup> September 2018</b>	<b>Approval date:</b>	<b>17<sup>th</sup> September 2018</b>
<b>Policy reviewer:</b>	<b>Compliance Specialist (Hazards)</b>	<b>Policy owner:</b>	<b>Head of Property</b>
<b>Review period</b>	<b>3 years</b>	<b>Next review due by:</b>	<b>September 2021</b>

## 1. Purpose

- 1.1 This policy relates to the Red Kite Group
- 1.2 The Red Kite Group 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). Compliance with this duty, is achieved by maintaining a robust asbestos management framework and safe system of work.
- 1.3 The legal duty extends to the manner of asbestos management in properties under Red Kite's control and protect those who may come into contact with ACMs.
- 1.4 The measures highlighted in this document are to be implemented at all properties owned by or managed by Red Kite Community Housing.

## 2. Definitions

ACM – Asbestos Containing Materials.

Red Kite Group – The Red Kite Group for the purposes of this policy consists of

- Red Kite Community Housing
- Twenty11
- Pennvale

## 3. Responsibilities

The duties of management, staff and personnel of the Red Kite Group 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 or the relevant Responsible Person who shall initiate further training or assistance as deemed necessary.

### 3.1 Chief Executive

The Chief Executive has overall responsibility for the management of asbestos and ensuring a clear vision and ensuing adequate resources to implement the policy.

### 3.2 EMT

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

- Allocate adequate resources 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

### 3.3 Head of Property

The Head of Property serves as the Asbestos Plan Manager 'Duty Holder' and is responsible for the strategic management of asbestos control within the Red Kite Group shall:

- Formulate and revise the Red Kite Group Asbestos Policy
- Formulate and revise the Asbestos Management Plan
- Ensuring adequate processes and procedures are in place to manage the risks arising from asbestos.
- 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 issues recurring

- Ensure risks arising from asbestos related activities are recorded, reviewed and mitigated
- Ensure adequate information, instruction and training is maintained to effectively manage risks arising from the control of ACMs
- Ensure that members of the public, staff and contractors are not unnecessarily exposed to risk arising from asbestos.
- Ensuring appropriate risk assessments are undertaken and that regular review is carried out.
- Ensuring appropriate inspections are made to assess the condition asbestos containing materials.
- Appoint a designated deputy (Compliance Manager) 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

### **3.4 Compliance Manager**

The Compliance Manager takes the lead on contract management for asbestos management. They regularly review risk assessments and safe systems of work to ensure that they are suitable and sufficient.

The Compliance Manager ensures that organisation such as asbestos surveyors and staff are competent by obtaining training and competency assessments.

### **3.5 Compliance Specialist (Hazards)**

The Compliance Specialist (Hazards) is responsible for the day to day running of the Asbestos Management Plan and will:

- Provide advice on the application of this document
- Feed information from asbestos related work back to managers
- Ensure that the asbestos register is maintained and up to date
- Ensure 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.
- Provide specialist advice and training when required.

### **3.6 People & Community Development Manager**

In consultation with the Head of Property, co-ordinate training for the Red Kite Group employees to ensure that mandatory asbestos awareness training is undertaken and refreshed at the required interval.

Will keep the training matrix up-date to show that employees have the required competencies to undertake their tasks.

### **3.7 Employees**

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

### **3.8 Contractors**

The Red Kite Group will only use approved licenced contractors to undertake removal works or where a licenced removal contractor is not required appropriately trained contractors will be carry appointed. Relevant qualified surveyors will be employed to undertake surveys etc.

This document is read in conjunction with the Red Kite Group Guide to Health and Safety Control and Management of Contractors, they are required to immediately report any asbestos related risks or concerns to the Red Kite Group 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 will occur through ongoing auditing and compliance with their own internal quality control systems.

Contractors are responsible for managing their own asbestos management procedures, training and records etc.

Contractors appointed to carryout both licensed and non-licensed works will be adequately vetted and required to submit relevant accreditations and licences prior to commencing works. They must hold the required levels of insurance.

### **3.9 Tenants**

This document 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 the Red Kite Group. Leaseholders are informed of their specific requirements in their Terms of lease conditions.

## **4 Legal Framework**

4.1 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 etc Act 1974, particularly Section 3: - General duties of Employers and Self-employed persons other than their employees.
- The Control of Asbestos Regulations 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

4.2 Approved Codes of Practices

- L143 Managing and Working with asbestos.

4.3 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

## **5 Key Principles**

### **5.1 Hazard Controls**

The 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

The Red Kite Group do not undertake any work to a property under their management without first obtaining adequate information on the nature, condition and extent of any ACMs present or, likely to be disturbed. The Red Kite Group ensure that any work carried out to ACMs is only undertaken by competent, fully trained and accredited contractors. Furthermore, reasonable measures to mitigate the risk of inadvertent or accidental release of asbestos fibres through work activities is undertaken.

### **5.2 Training and Information**

The Red Kite Group Community Housing ensure 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 attend a suitable training course on a regular basis.

Staff are trained on the contents of the Asbestos Management Plan and this policy at regular intervals.

The Red Kite Group communicates widely on asbestos related guidance and good practice. General information on good practice is issued to new tenants and regularly communicated to tenants and leaseholders through leaflets. Tenants have access to asbestos related information relevant to their home via an asbestos database, hosted on the Red Kite Group website.

The Red Kite Group liaise with external emergency services to minimise the potential risks that could arise from activities, where ACMs could become.

Right to buy applicants are informed of the locations and precautions regarding asbestos when they apply to buy the property. This information is included within the 'Offer Notice.'

## **6 Policy Statement**

The Red Kite Group aims to:

- 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
- Manage and record asbestos within domestic dwellings and fully comply with our legal 'Duty to Manage' requirement of asbestos within communal areas.

## **6 References**

The documents used are listed in the legal framework section.

## **7 Related Policies & Procedures**

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

- Corporate Health and Safety Policy
- Asbestos Management Plan
- Asbestos guidance for contractors
- Asbestos information for tenants
- Asbestos contract
- Asbestos Register
- Asbestos archetype methodology
- Flow charts identifying relevant control and management processes