

Melville Housing Association



Policy: Asbestos Management

Subject:	Asbestos Management
Section:	Property Services
Objective:	This policy is designed to establish clear guidelines to be adopted whenever asbestos is encountered in premises owned by, or occupied by the Association, and to ensure compliance with the appropriate legislation.
Scottish Social Housing Charter	Outcome 4 – Quality of Housing Outcome 5 – Repairs, Maintenance & Improvements
Relevant Legislation	Policy developed to comply with the Health and Safety at Work Act 1974, the Control of Asbestos Regulations 2012 and all associated Approved Codes of Practices
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Melville Housing Association Ltd



Asbestos Management Plan

August 2021

DOCUMENT HISTORY



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17/05/2013	MHA/G73559/001	Meeting re draft AMP
17/08/2017	MHA/G73559/002	Updated Asbestos Management Plan
16/08/2018	MHA/G73559/003	Updated Asbestos Management Plan
19/8/2019	MHA/G73559/004	Updated Asbestos Management Plan
01/08/2021	MHA/G73559/005	Updated Asbestos Management Plan

Quality Control	Name	Date
Prepared by:	Martin Sloan	01/08/2021

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IMPORTANT INFORMATION ABOUT YOUR MANAGEMENT PLAN



This Asbestos Management Plan is a document with legal status
IT SHOULD REMAIN ON SITE AT ALL TIMES

If you need help understanding the requirements of this document contact:

Asbestos Coordinator / Duty Holder:

Martin Sloan

Tel: 0131 561 6485

Mobile: 07702 962 641

Email: MSloan@melville.org.uk

In the absence of the above:

Nancy Booth

Tel: 0131 561 6484

Mobile: 07948 153 692

Email: nbooth@melville.org.uk

SCOPE OF POLICY

Melville Housing Association Ltd recognise their duties under the Health and Safety at Work Act 1974, the Control of Asbestos Regulations 2012 and all associated Approved Codes of Practices and is committed to the effective management of asbestos.

Melville Housing recognise their responsibilities to contractors and others involved in building and maintenance projects established through the Construction (Design and Management) Regulations 2015 and its duties as the 'Duty Holder' of Trust owned buildings as defined by Regulation 4 of the Control of Asbestos Regulations 2012.

This Asbestos Management Plan sets out Melville Housings' strategy for compliance of all relevant Health and Safety legislation regarding asbestos within Melville Housing Association owned and controlled properties.

This document details what steps will be undertaken by Melville Housing to ensure that the risk from known or suspected Asbestos Containing Materials (ACMs) identified within Melville Housing owned or controlled properties is adequately managed, so that as far as reasonably practicable no one can come to any harm from asbestos.

It also details the responsibilities of Melville Housing and its employees, contractors and regular building users. All procedures outlined below are mandatory for all parties involved.

This document and the procedures outlined require the cooperation of all employees, all staff, building users and contractors who also have responsibilities to ensure a safe and healthy working environment is maintained at all times.

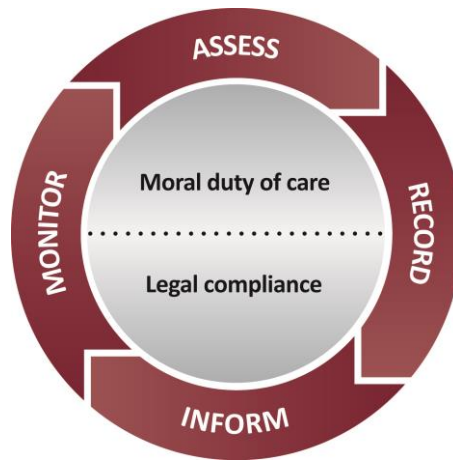
SECTION 1 - INTRODUCTION

Your Asbestos Management Plan

This Asbestos Management Plan has been designed with the sole purpose of managing the risk from Asbestos Containing Materials (ACMs) identified within Melville Housing Association so that as far as reasonably practicable no one can come to any harm from ACMs on the premises. It is an integral part of Melville Housing Association's strategy for compliance of all current Health and Safety legislation regarding asbestos.

Principles of Asbestos Management

The main principles of asbestos management are to Assess, Record, Inform and Monitor:



ASSESS: Asbestos in premises does not necessarily create an unacceptable risk. Asbestos is the hazard; the risk can only be defined when this hazard is assessed within the environment in which it is found. This assessment must take into account the activities carried out near or on the asbestos for the assessment to be able to present viable recommendations. It may take the form of a desktop study, a full asbestos survey, or a combination of the two.

RECORD: All assessments and the location and condition of any known or presumed asbestos containing materials must be recorded, updated and regularly reviewed. Similarly, any changes to the condition or location of any known or suspected ACMs, any training, any controlled removal works, reinspection, etc., must all be recorded. It is imperative that all asbestos documents are kept up to date, are coherent and are accessible.

INFORM: All asbestos records gathered must be made available to all relevant people at a suitable time. All staff, contracted workers, regular building users and maintenance staff, etc may require access to asbestos records held for this site and so they must be made available to anyone who may require them. Additionally, a system of training, seminars, question and answer sessions, as well as site inductions should be adopted where appropriate to ensure that everyone is kept informed about asbestos and that the information they have access to be relevant, accurate and understandable.

MONITOR: All asbestos records, procedures, training and safe systems of works must be regularly monitored and reviewed; this is an Approved Code of Practice (ACoP) requirement. The purpose of this on-going monitoring is to ensure that the aims of the asbestos management strategy are being met, that all systems are efficient and workable and that no one is being exposed to asbestos.

Asbestos Regulations

There are many health and safety regulations that either directly or indirectly places a duty on the employer with regards to asbestos. The key facts of these regulations have been set out below:

The Health & Safety at Work etc Act 1974 (HSW): requires employers to conduct their work in such a way that their employees will not be exposed to health and safety risks, and to provide information to other people about their workplace which might affect their health and safety. Section 3 of the HSW Act contains general duties on employers and the self-employed in respect of people other than their own employees. Section 4 contains general duties for anyone who has control, to any extent, over a workplace;

The Management of Health & Safety at Work Regulations 1999: (the Management Regulations) requires employers and self-employed people to make an assessment of the risks to the health and safety of themselves, employees and people not in their employment, arising out of or in connection with the conduct of their business – and to make appropriate arrangements for protecting those people’s health and safety. Any assessment made for the purposes of the Asbestos Regulations will not need to be repeated for the Management Regulations;

The Workplace (Health, Safety and Welfare) Regulations 1992: requires employers to maintain workplace buildings so as to protect occupants and workers;

The Construction (Design & Management) Regulations 2015: require the client to pass on information about the state or condition of any premises (including the presence of hazardous materials such as asbestos) to the CDM Coordinator before any work begins and to ensure that the health and safety file is available for inspection by any person who needs the information.

The Defective Premises Act 1972 in England and Wales or the Civic Government (Scotland) Act 1982 in Scotland: places duties on landlords to take reasonable care to see that tenants and other people are safe from personal injury or disease caused by a defect in the state of the premises. Any premises in such a state as to be prejudicial to health constitute a statutory nuisance under section 79 of the Environmental Protection Act 1990. An abatement notice can be served by the local authorities on the owner or occupier of premises requiring prevention or restriction of the nuisance;

The Control of Asbestos Regulations 2012: requires employers to prevent the exposure of their employees to asbestos, or where this is not practicable, to reduce the exposure to the lowest possible level.

Regulation 4 specifically requires duty holders to:

- a) Take reasonable steps to find materials in premises likely to contain asbestos and to check their condition;
- b) Presume that materials contain asbestos unless there is strong evidence to suppose that they do not;
- c) Make a written record of the location and condition of asbestos and presumed asbestos-containing materials (ACMs) and keep the record up to date;
- d) Assess the risk of the likelihood of anyone being exposed to these materials; and
- e) Prepare a plan to manage that risk and put it into effect to ensure that:
 - i. Any material known or presumed to contain asbestos is kept in a good state of repair;
 - ii. Any material that contains or is presumed to contain asbestos is, because of the risks associated with its location or condition, repaired or if necessary removed; and
 - iii. Information on the location and condition of the material is given to anyone potentially at risk.

Asbestos Management Plan scope

This Asbestos Management Plan relates to all buildings and premises owned or controlled by Melville Housing Association.

This asbestos management plan should be read in conjunction with the asbestos data held by MHA.

This Asbestos Management Plan has been prepared especially for Melville Housing Association Ltd who throughout this document will be referred to as MHA. It is a working document and should be regularly updated and amended to ensure it remains valid and as accurate as possible.

SECTION 2 – ROLES AND RESPONSIBILITIES

Overview of Roles and Responsibilities

Where duties have been outlined, this should be used as an initial guide for discussion/definition of roles within the MHA. All responsibilities can be delegated, unless otherwise stated, but it should remain the responsibility of the designated person to ensure they are completed satisfactorily.

Role: ASBESTOS COORDINATOR / DUTY HOLDER
Training requirements: Asbestos awareness, asbestos management
Ongoing training requirements: Asbestos Awareness refresher training every two years or earlier if there is a significant change in appropriate legislation.
Roles & Responsibilities: <ol style="list-style-type: none">1. Oversee asbestos management provision across all MHA properties.2. Inform all relevant parties of the asbestos management system and their responsibilities.3. Oversee the implementation of all procedures and safe systems of work regarding asbestos throughout the MHA in liaison with the Health & Safety Department.4. Review agreed roles and nominate as appropriate.5. Receive training on Asbestos Containing Materials.6. Ensure reinspection surveys are undertaken appropriate intervals.7. Ascertain that all work carried out on asbestos containing materials complies with current regulations and best practice.8. Ensure an assessment of the hazards and risks from asbestos containing materials is undertaken and recommended appropriate control measures defined.9. Keep staff and managers informed about asbestos hazards and control measures that are relevant to their work, department and staff.10. Oversee the coordination of monitoring of the environment during asbestos works.11. Implement appropriate procedures to ensure appropriate management of asbestos remedial works and/or further survey etc where day to day maintenance activities are affected by the presence of asbestos i.e. task-driven remedial works.12. Identify persons requiring specific information and instruction in asbestos work and coordinate appropriate training.13. Ensure adequate instruction and training is provided to enable persons to fulfil their responsibilities with regards to asbestos management.14. Ensure all records are maintained in accordance with the regulatory requirements and codes of practice for asbestos work.15. Ensure all work carried out on asbestos containing materials complies with current regulations and best practice.16. Ensure all information is uploaded onto MHA's property database

17. Act as the main point of contact for all questions and queries relating to asbestos.
18. Identify persons requiring specific information and instruction in asbestos work and coordinate appropriate training.

Role: ASBESTOS RESPONSIBLE PERSON

Training requirements: Asbestos awareness, asbestos management

Ongoing training requirements: Asbestos Awareness refresher training every two years or earlier if there is a significant change in appropriate legislation.

Roles & Responsibilities:

1. Review agreed roles and nominate as appropriate
2. Inform all relevant parties of the asbestos management system and their responsibilities
3. Oversee the Asbestos Coordinator to ensure activities are being undertaken
4. Provide the Asbestos Coordinator with support in managing the asbestos where required

Role: PROPERTY OFFICER

Training requirements: Asbestos awareness

Ongoing training requirements: Annual refresher training

Roles & Responsibilities:

1. Update the MHA database following asbestos survey / sampling works
2. Update the MHA database following re-inspection of identified ACM's
3. Update the MHA database following asbestos remedial works
4. Ensure all those required to have access to the MHA database for the asbestos data are able to access
5. Provide a report to the Asbestos Coordinator on a monthly basis regarding the overall compliance of the portfolio and on an ad hoc basis when items are becoming overdue
6. Ensure Contractors have adequate asbestos information before works start
7. Ensure all personnel working for MHA that have the potential to disturb asbestos have adequate asbestos awareness training in accordance with Regulation 10 of CAR 2012
8. Ensure only approved Licensed contractors and Accredited consultants are used to work on asbestos
9. Ensure Clearance and Monitoring Certificates are received immediately on completion of enclosure clearance and prior to reoccupation of the treated area
10. Ensure that the presence of ACM's is considered at project inception, and that the relevant project/design team members are provided with all the information available.

Roles and Responsibilities training requirements summary

Role	Asbestos Awareness	Asbestos Management	BOHS P405	Annual Refresher
Asbestos Coordinator / Duty Holder	✓	✓	✓ (recommendation)	✓
Asbestos Responsible Person	✓	✓		✓
Property Officer	✓			✓

See Section 6: Training and Induction

SECTION 3 – STRATEGY FOR COMPLIANCE

This Asbestos Management Plan outlines how MHA is managing the risk from known or suspected asbestos throughout its properties.

Current Provision

Melville Housing Association has 2,032 properties within its portfolio for which they are solely responsible. Approximately 1,500 properties have been subject to an asbestos inspection previously. To date all communal areas have been surveyed. All voids are also surveyed if they contain textured coatings, vinyl floor tiles or if no recent survey information is held for a similar house in the same street.

The current portfolio is as follows:

The majority of the housing stock ranges from 1948 – present. MHA also have maintenance responsibility for The Woman’s Aid Refuge & Midlothian Council Homeless Accommodation.

Historically work with the MHA portfolio has been undertaken by Redhills. Since July 2016, Lucion Environmental are now the asbestos consultant working with MHA. A range of management, refurbishment / demolition surveys and bulk sampling works has been undertaken as per the request of MHA.

An Asbestos Management Plan is a requirement of Regulation 4 of the Control of Asbestos Regulations (CAR) 2012. The document formally in place has been updated as appropriate.

Asbestos Management training was undertaken by MHA on 10 January 2021 by Mentor.

MHA currently use ‘ActiveH’ and ‘INVU’ to store / manage the asbestos data.

Asbestos information is shared with tenants via a guidance note containing details on any relevant survey information. This guidance note is provided as part of tenants start up packs.

Since the previous Asbestos Management Plan the following actions have been completed:

- Gap analysis / audit of existing information on ActiveH.
- Historic asbestos data (surveys and remedial work) been uploaded to ActiveH. The new and existing data has been reviewed.
- Investigate how to update information held on ActiveH upon completion of remedial works and re-inspections (ensuring that a full history is maintained for all buildings).
- Inform all relevant parties of their responsibilities (and provide adequate training where appropriate), with regards to asbestos management provision throughout MHA
- Provide Contractors with the relevant asbestos information prior to works commencing or as part of the works order.
- To provide tenants with information about possible ACM’s within their property

Future Provision

Within the next six months to one year MHA aims to have the following aspects of its provision for asbestos management completed;

1. Continue to review the schedule of high and medium risk ACM’s across MHA as surveys are undertaken.
2. Ensure asbestos information is in place for all communal areas and undertake annual re-inspection surveys.

SECTION 4 – ASBESTOS RECORDS AND DISSEMINATION

Current Asbestos Records

The following summarises what information is held by MHA and how it will be disseminated:

ASBESTOS MANAGEMENT PLAN: The Control of Asbestos Regulations 2012 requires all duty holders as part of their on-going asbestos management to have a written Asbestos Management Plan (this document). This document details what steps will be taken to effectively manage all items of asbestos; it is specifically written for Melville Housing Association and cannot be transferred. It also details all assessments made of ACMs (asbestos-containing materials) and provides recommendations, priorities and deadlines for action.

The Asbestos Management Plan is available for reference and use to all those who plan, supervise or carry out maintenance works or special projects on any part of Melville Housing Association. In addition, it is available for staff and contractors upon request.

The Asbestos Management Plan will be held by the Asbestos Coordinator.

ASBESTOS REGISTERS: Information regarding the location and condition of asbestos throughout the MHA has been recorded in the asbestos registers held and can be found by accessing ActiveH & INVU.

This Asbestos Management Plan should be read in conjunction with the asbestos registers held.

REINSPECTIONS: Regulation 4(9) of the Control of Asbestos Regulations 2012 states that:

‘(9) The measures to be specified in the plan for managing the risk shall include adequate measures for –

(a) monitoring the condition of any asbestos or any substance containing or suspected of containing asbestos.....’

Any ACMs identified or suspected within the communal areas will be reinspected at least annually to check that it has not changed condition, deteriorated or been damaged in any way. Re-inspections will be undertaken as in accordance with the Approved Code of Practice, L143 second edition, Managing and working with asbestos.

Re-inspections are currently undertaken by the Property Officer of MHA to common areas whom which MHA has responsibilities.

The Asbestos Coordinator is currently responsible for ensuring that the asbestos records for each site (including re-inspections) are up to date.

TRAINING RECORDS: All those who plan and manage works which may affect or be affected by asbestos will be given an appropriate level of training and help to understand their responsibilities and any information regarding asbestos. All training will be an ongoing process and will be organised in conjunction with the Asbestos Coordinator.

These records are collated as training is undertaken / received. They will detail the training given to each employee and be signed or verified by the employee themselves. Any training certificates received will be held centrally as a full record of who has received what training and when. These records will be treated as confidential to each member of staff and be kept in a controlled location. Each employee will, however, have access to their own records upon request.

LABORATORY REPORTS:

All reports received from independent laboratories will be held within ActiveH & INVU - reports such as any Airborne Fibre Monitoring Reports (this would include clearance and background testing) or any Bulk Sampling Certificates, etc, will be stored with the relevant permit to work.

ASBESTOS REMEDIATION: All details of asbestos removal or remedial works undertaken within MHA will be recorded. The Asbestos Records will be updated when new information becomes available at the end of every project.

The asbestos coordinator & property officers currently update the database.

The following summarises what information should be collated and maintained by MHA:

SITE INDUCTIONS: The disturbance of ACMs should be avoided if information is communicated effectively, however the name and contact number of the Asbestos Coordinator should be supplied to enable any such disturbance to be reported.

LIST OF APPROVED ASBESTOS CONTRACTORS: Only contractors on the approved list of contractors will be employed within MHA to undertake licensable and non-licensable asbestos works throughout the MHA portfolio. Insurance certificates, licenses, Health & Safety policy and training records are requested before a contractor is approved.

It is expected that all other contractors employed to undertake maintenance within MHA which may disturb the fabric of the building or known or presumed ACMs have undertaken asbestos awareness training as in accordance with Regulation 10. MHA is not responsible for providing third party contractors commissioned to undertake works on behalf of MHA with asbestos awareness training, they will however provide them with all relevant asbestos information to the planned works before they attend site and also during any pre start meetings before works commence.

RECORDS OF EXPOSURE/INCIDENTS: These records will be collated if necessary to detail the exact nature and known extent of any exposure to asbestos that has occurred in any part of MHA or to a MHA employee: contractors, including asbestos removal contractors will be expected to control the records of their own staff unless previously arranged.

Whilst every step has been taken to ensure exposure to asbestos does not occur, it is vital good record keeping is maintained. These records will be treated as confidential to each member of staff and be kept in a controlled location. Each employee will have access to their own records upon request.

Updating Information

It is imperative that all asbestos records are regularly updated with any new information that becomes available. Asbestos records will be updated covering the following:

Action	Timescale	Responsible Party
Remedial / removal works	Upon completion of works	Asbestos coordinator / property officers
Reinspections, bulk sampling, further surveys works (including refurbishment and demolition surveys)	Upon completion of works	Asbestos coordinator / property officers
Training / site inductions	Upon completion of training / site inductions	Asbestos coordinator
Accidental disturbance of known or suspected ACMs	Upon accidental disturbance of asbestos	Asbestos coordinator
Task assessments	Upon completion of task assessments	Asbestos coordinator
Any changes made to the contact details for the Asbestos Coordinator and/or emergency contacts	If / when contact details are amended	Duty holder
Any changes to the organisation structure of MHA which may affect asbestos management facilities	If / when organisation changes are made	Duty holder
Any new procedures adopted	If / when new procedures are adopted	Duty holder / Asbestos Coordinator

SECTION 5 – ON-GOING ASSESSMENT OF ASBESTOS

On-going Assessment

On-going assessment of known or suspected ACMs within MHA will take the form of periodic reinspection surveys as in accordance with the Control of Asbestos Regulations 2012. It is imperative that both known and presumed asbestos containing materials are effectively monitored and that all asbestos information is as up to date and accurate as possible.

Similarly, any management procedures, permit-to-work systems, etc, will be audited and regularly assessed to ensure that they are achieving the goal of effective asbestos management. If any procedures are proved to be inadequate or any accidental or unknown disturbance of asbestos materials has occurred then the necessary action can be taken.

REINSPECTION: All items that have been positively identified will undergo regular, ongoing reinspections at 12 monthly intervals (minimum) from the date of the last inspection/survey.

The purpose of undertaking the reinspection is to ensure that Material and Priority Assessments are still current. i.e. that the material has not deteriorated in any way and that the use of the building has not changed. Any change to either criterion will result in the overall Risk Assessment being invalid and therefore a new assessment will be required. This will in turn be recorded.

Reinspections are a requirement of ACoP L143 second edition, Managing and working with asbestos.

MHA currently store all reinspection documentation in a lever arch file.

MONITOR AND REVIEW: This Asbestos Management Plan will be regularly reviewed and revised every 6 months to ensure that all information is correct and that the plan achieves its objectives.

More information regarding how the Asbestos Management Plan will be monitored and reviewed is given in Section 8.

See Section 8: How to Monitor and Review this Plan

SECTION 6 – TRAINING AND INDUCTION

Different training and induction will be provided for different building users; the purpose being to provide all relevant personnel with the skills and knowledge necessary to understand the hazards and risks involved when working in or near an area where asbestos has been identified.

Training will be provided for all relevant MHA employees. Pre start meetings will be undertaken for all third party contractors.

This training/meeting will be provided prior to any persons commencing work to enable persons to work safely.

Any training provided to MHA employees will incorporate general asbestos awareness that is not only site specific but will also incorporate general asbestos knowledge and advice that can be used across MHA owned properties.

Within MHA it is envisaged that there three main user groups who require regular training/induction and the opportunity for feedback;

1. **THIRD PARTY CONTRACTORS / EVERDAY PLANNED MAINTENANCE WORKS:** Any contractors whose work may affect or be affected by asbestos present will be requested to attend a pre start meeting.
2. **THOSE WHO PLAN AND MANAGE WORKS:** Anyone who is involved in planning or supervising works which may affect or be affected by ACMs will be provided with asbestos management training.
3. **P405:** Those responsible for managing asbestos within MHA (the Asbestos Coordinator) should undertake the BOHS proficiency module, P405 Managing asbestos in buildings.

It is not envisaged that any training or site induction is required for administration or general staff within MHA or for any general visitors to the site where their works will not be affected by any asbestos present.

Third Party Contractors

MHA recognises its responsibilities under regulation 3(4) (a) of the Asbestos Regulations and will ensure that adequate information, instruction and training is provided to any contractors on its premises in the form of a site induction.

The Asbestos coordinator is responsible for disseminating all information.

The information provided should cover:

1. A brief summary of the location of any known or suspected ACMs which may affect, or are local to, the planned works.
2. The types of activities which are prohibited, areas which are controlled access, etc.
3. What to do should they suspect ACMs have been accidentally disturbed along with a contact number.

In addition, it is also important to emphasise that any damage to an ACM – no matter how minor - MUST be reported to the Asbestos Coordinator as soon as possible.

Persons who have direct involvement in emergency procedures, such as the Fire Brigade, etc, will also be included here, but they will be best served by a copy of the Asbestos Register being made available to them, and liaising with them as to what further information they need.

Those who plan and manage work

All those who order, plan or supervise works should be provided with asbestos management training. Training will cover;

1. A brief introduction explaining what asbestos is, and the hazards associated with it, etc.

2. A brief summary of the information held by MHA and how to gain access to it.
3. A brief summary of products likely to contain asbestos and where they are likely to be found.
4. The types of activities which are prohibited, areas which are controlled access, etc.
5. The limitations of a survey and certificates of reoccupation.
6. The main legislative requirements, in particular Regulation 4, of the Control of Asbestos Regulations 2012.
7. How to continue the everyday running of sites should any planned asbestos works take place.

All training provided will be recorded and a certificate of attendance issued.

P405

In order to ensure that the Asbestos Coordinator has sufficient asbestos knowledge and training to understand the requirements of CAR 2012 and their responsibilities it is recommended that MHA consider the BOHS (British Occupational Hygiene Society) proficiency certificate in the 'Management of Asbestos in Buildings' (P405) for the Asbestos Coordinator.

The P405 course is designed to provide delegates with the practical knowledge and the skills to be able to manage asbestos in buildings and to provide a basic knowledge of asbestos removal procedures. The course syllabus covers:

1. Legislation
 - a. Health & Safety at Work Etc. Act 1974
 - b. Asbestos Regulations
 - c. Approved Codes of Practice
 - d. Health Effects of Asbestos
2. Management of Asbestos in Buildings
 - a. Types and Uses of Asbestos in Buildings
3. Asbestos Remediation
 - a. Preparation
 - b. Enclosures
 - c. Remediation Measures
 - d. Removal Procedures
 - e. Waste Removal
4. Role of the Laboratory/Analyst
 - a. Role of Analyst
 - b. Air Monitoring and Other Techniques
 - c. Four Stage Clearance Procedure and Testing of Enclosures
5. Practical Work

- a. Pre-start Inspections
- b. Role Playing

The above will ensure that MHA have an appropriately trained, competent and knowledgeable person to act as an onsite representative for MHA enabling them to deal with queries and oversee the asbestos management provisions put in place.

Future Training

MHA will provide any additional persons where it is deemed that asbestos training would be beneficial at the next available opportunity.

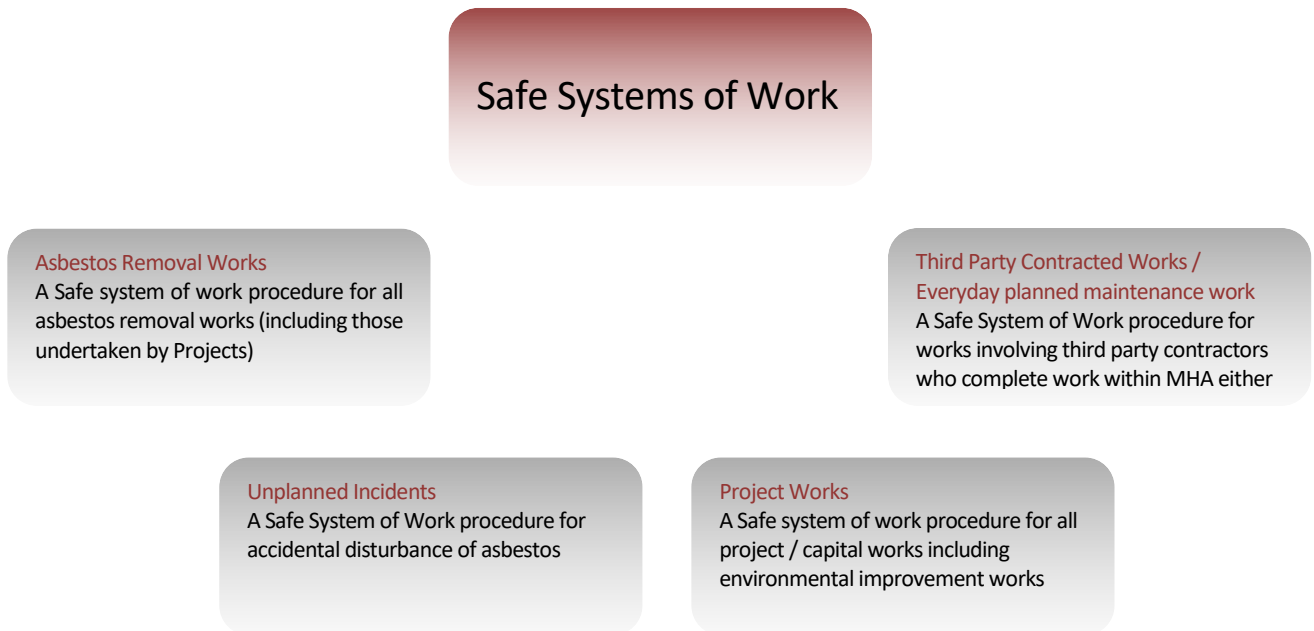
This may include anyone who has particularly requested more information regarding asbestos; or anyone else deemed in a position that will benefit from asbestos training. It is possible that these sessions can be open invite to a certain extent and will be done in a short presentation, and maybe a question and answer session.

Additionally, asbestos refresher training of an appropriate level will be carried out throughout MHA to ensure that up to date and accurate asbestos knowledge best compliments the management strategies put in place.

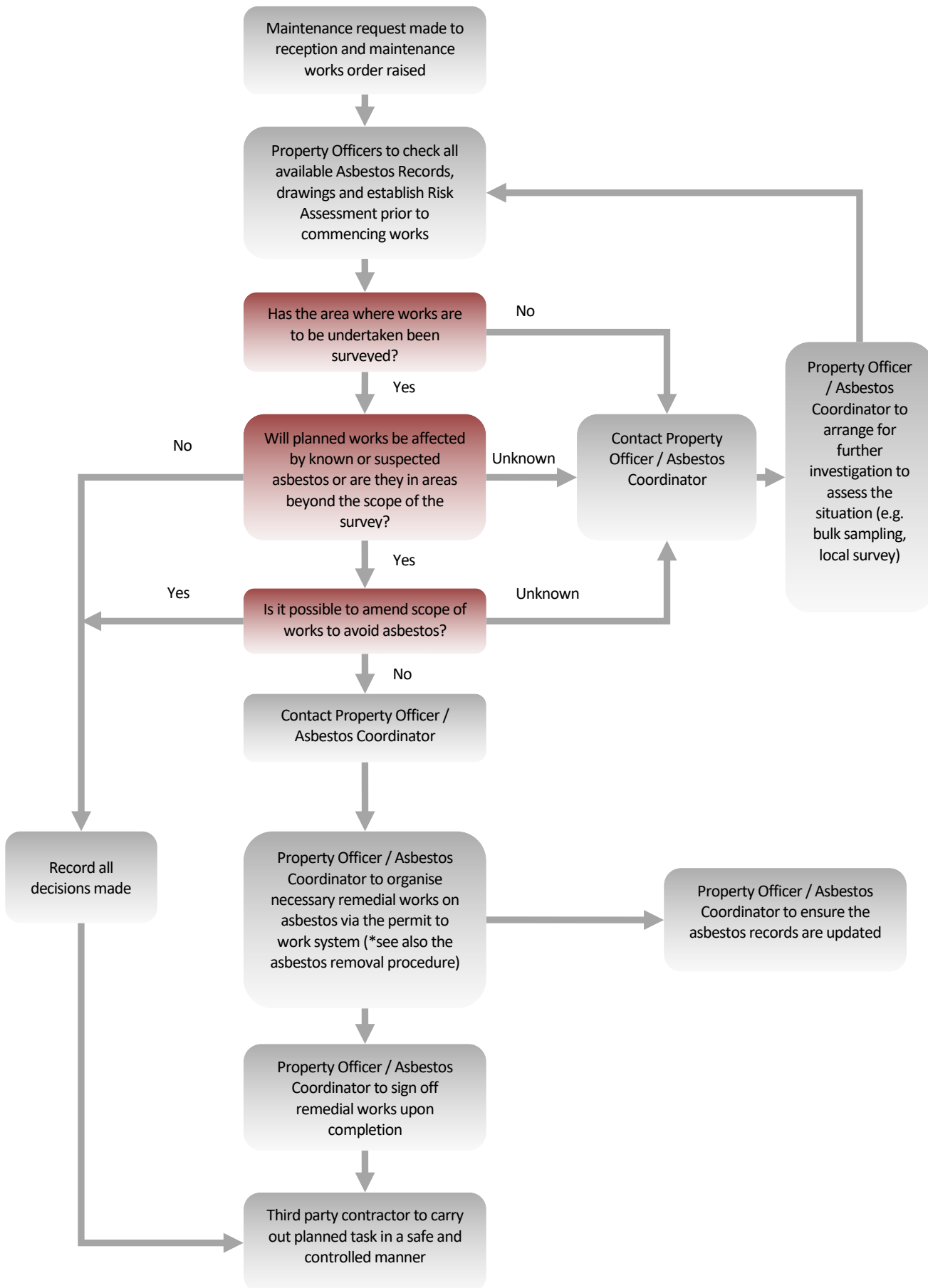
SECTION 7 – SAFE SYSTEMS OF WORK

A safe system of work is a procedure or adopted policy which should always be followed to ensure that the relevant precautions are taken and that no-one is exposed to asbestos during the course of their work.

Any planned maintenance activities, refurbishment, demolition works or works which may impact upon known or suspected asbestos will not take place until an assessment of the task has been carried out by a competent person. This assessment will be undertaken prior to any works being undertaken and will be documented. In this section four main processes are described;



EVERY DAY AND MAINTENANCE WORKS / THIRD PARTY CONTRACTED WORKS: This flow chart summarises steps which should be taken to ensure that day to day tasks undertaken by third party contractors are carried out in a safe manner.



Third Party Contracted Works

This group consists of works which are carried out by third party contractors.

It is expected contractors employed to undertake maintenance within MHA which may disturb the fabric of the building or known or presumed ACMs has undertaken asbestos awareness training as in accordance with Regulation 10. MHA is not responsible for providing third party contractors commissioned to undertake works on behalf of MHA with asbestos awareness training, they will however provide them with all relevant asbestos information to the planned works before they attend site and also during a site induction before works commence.

It is just as important to inform all concerned if no asbestos is present but that safe systems of work should always be followed. Should any ACMs be discovered during the course of the works or if it is suspected that asbestos may have been disturbed then the Asbestos Coordinator should be notified immediately.

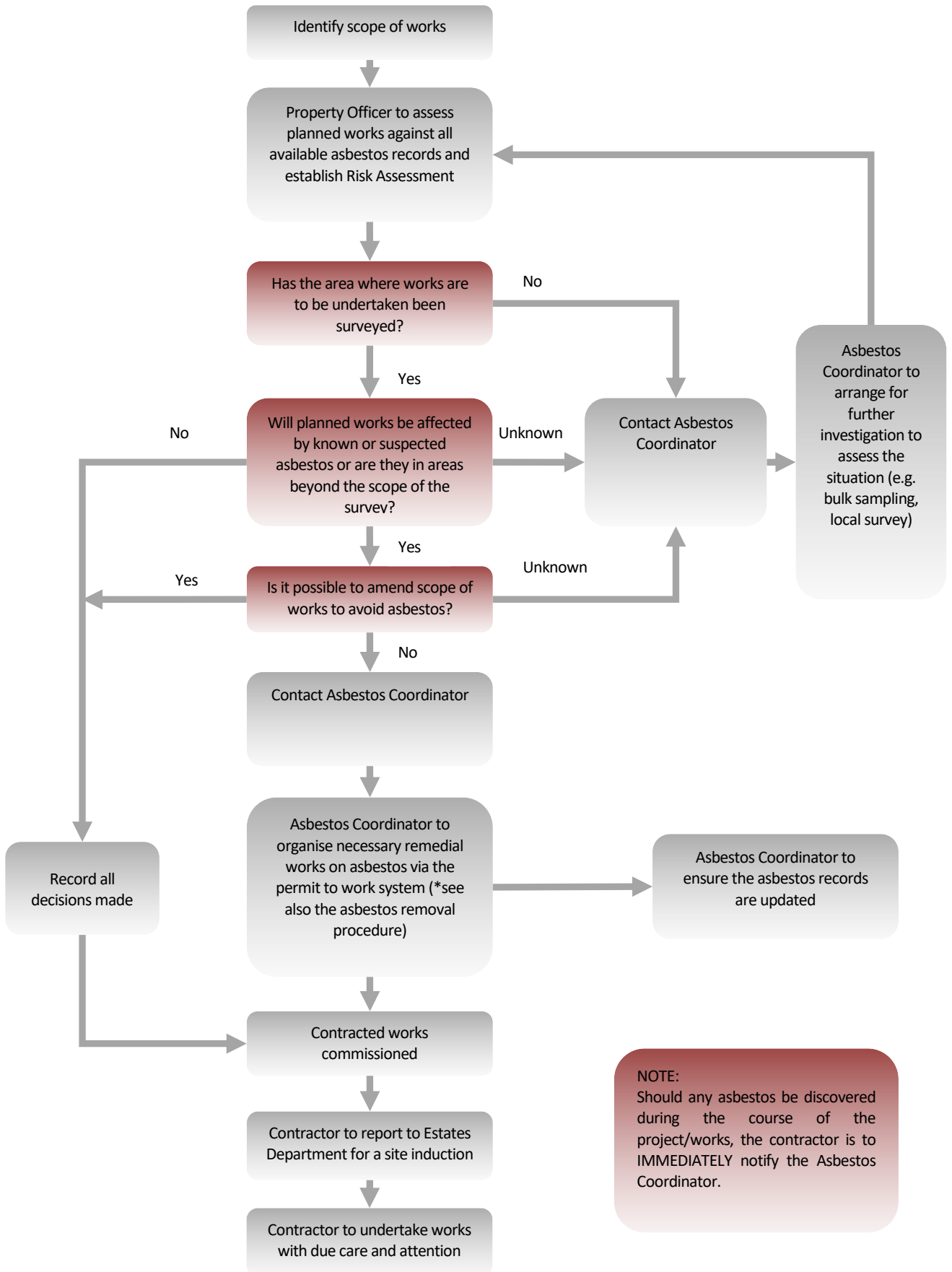
It is important to note that whoever commissions the works from third party contractors is responsible for ensuring that they are fully site inducted and provided with all relevant asbestos information.

All contractors should be required to provide copies of their policies in relation to the general provisions of the Health and Safety at Work Act 1974, and asbestos management. They should in turn be given access to all relevant Asbestos Records.

All persons must cooperate with the process of identification, assessment and control of asbestos and participate in training and induction programmes.

Employees and contractors should be made aware that areas listed as 'No Access' on any Asbestos Register must be presumed to contain asbestos unless there is strong evidence to the contrary. Procedures for those working near known asbestos, including emergency procedures, should also be clearly communicated.

THIRD PARTY CONTRACTED WORKS: This flow chart summarises steps which should be taken to ensure that all third party contracted works undertaken within MHA are carried out in a safe manner.



Planned Maintenance

This group consists of all project driven tasks (including environmental improvement works and asbestos removal works) and any tasks which are not carried out by MHA's own staff.

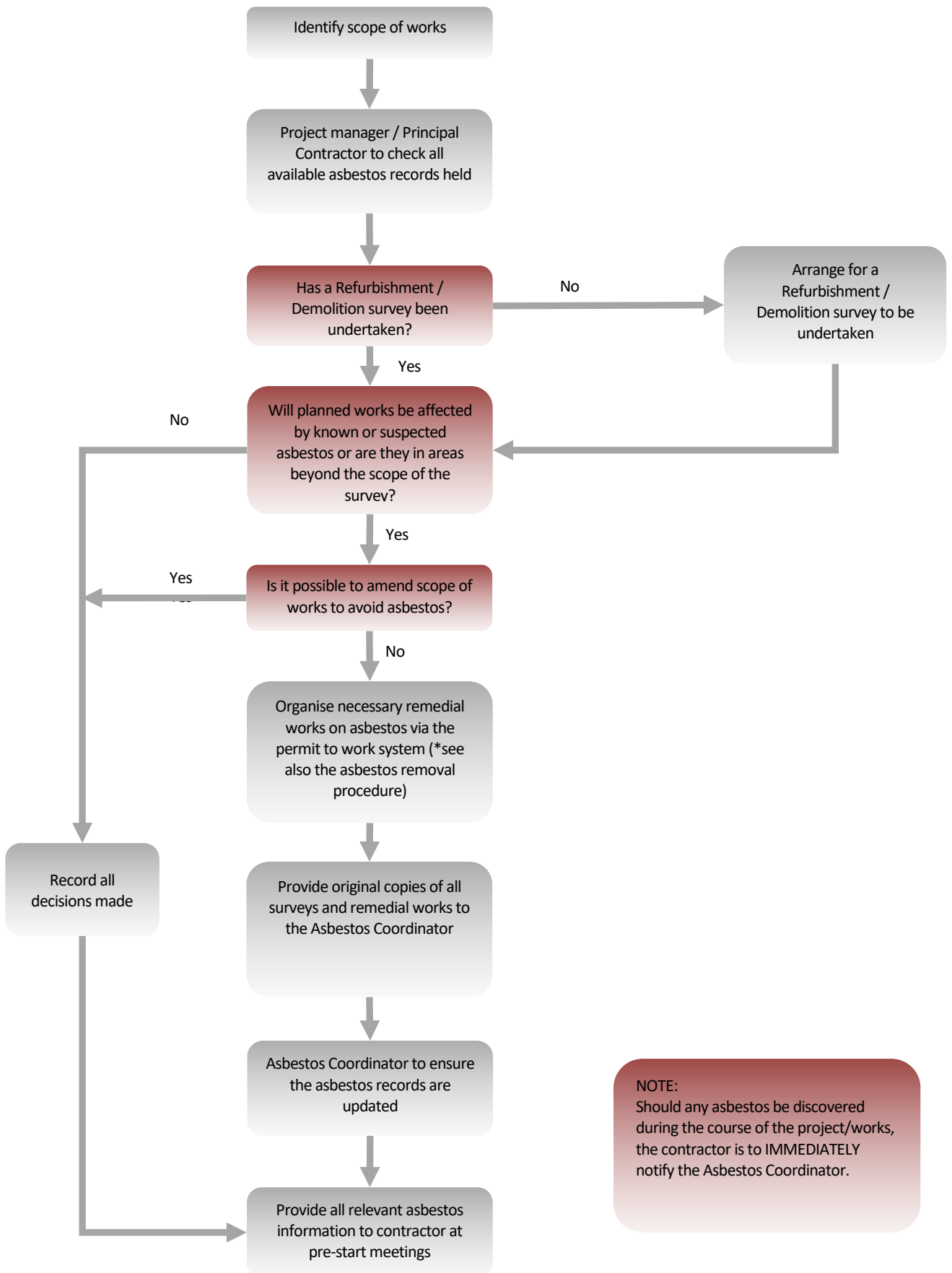
For all projects that fall under the CDM Regulations 2015 (Construction, Design & Management), MHA will ensure that the CDM Co-ordinator is provided with all asbestos information in MHA's possession relating to the project for inclusion in the Health and Safety file as in accordance with Regulation 4(9)(C) of the Control of Asbestos Regulations 2012.

Contractors will also be informed that should they discover any ACMs during the course of their work, that they must notify the Contract Administrator and the Asbestos Coordinator IMMEDIATELY.

All persons must cooperate with the process of identification, assessment and control of asbestos and participate in training and induction programmes.

Employees and contractors should be made aware that areas listed as 'No Access' on any Asbestos Register must be presumed to contain asbestos unless there is strong evidence to the contrary. Procedures for those working near known asbestos, including emergency procedures, should also be clearly communicated.

PLANNED MAINTENANCE: This flow chart summarises steps which should be taken to ensure that project/capital works at MHA are carried out in a safe manner.



NOTE:
Should any asbestos be discovered during the course of the project/works, the contractor is to IMMEDIATELY notify the Asbestos Coordinator.

Asbestos Removal Works

This group consists of all maintenance and project driven asbestos removal works.

Project officers and the asbestos coordinator are currently responsible for commissioning this work for MHA.

It should be noted that only MHA approved removal contractors and analytical companies will be employed to undertake asbestos removal and analytical works on any MHA owned or controlled property.

Prior to any asbestos removal works MHA will ensure that full survey information is available for the area in question. In the case of refurbishment / demolition works a Refurbishment / Demolition survey as described in HSG 264 will be undertaken.

Tendering companies for asbestos works should demonstrate knowledge of relevant current legislation pertaining to the safe removal of asbestos and awareness of other Health & Safety legislation and hazards that may be encountered on site. Information provided to tendering companies will include an asbestos survey report with fully annotated plans, full scope of works, information regarding any non-asbestos hazards relevant to the work area and any working practices required for working on the site.

Prior to the commencement of any removal works the licensed asbestos removal contractor appointed will be expected to:

- Provide a method statement and risk assessments as to how the asbestos is going to be removed;
- Disseminate any other information required to undertake any work activities.

The appointed asbestos analyst / consultant will be expected to prepare, review and comment on asbestos removal works specifications and prior to commencement of the works the contractors' method statement on behalf of MHA.

Within MHA only UKAS accredited companies on MHA's approved list will be commissioned to undertake survey works or analytical work. For survey works the company should be accredited to ISO 17020 and for analytical works to ISO 17025.

Air monitoring during any removal works should be undertaken by an independent UKAS accredited laboratory.

Unless commissioned through a Principal Contractor MHA will engage the services of an analytical company directly. Under no circumstances should the asbestos removal contractor engage the services of the analysts on behalf of MHA.

An approved analytical company will be employed by MHA to oversee the smoke testing, provide air monitoring (including leak testing where appropriate), conduct the Four Stage Clearance procedure and oversee the contractor at all stages of the works. The analytical company will also be expected to attend any pre-start meetings, progress meetings and a handover meeting so that MHA is kept fully informed at all times.

On completion of any asbestos remedial works the Project Manager should ensure that the Asbestos Coordinator is provided with a completion document. This document should be retained with the project file in a central stored location. The completion document should include the following:

- Air monitoring certificates;
- Waste consignment notes;
- Removal contractors method statement;
- Updated plans illustrating all asbestos items that have been removed and all asbestos that has been retained.

The Project Officers / Asbestos coordinator is responsible for updating ActiveH / INVU.

Unplanned Incidents

An assessment will be undertaken following any accidental disturbance of material known or suspected of containing asbestos: all staff will be made aware that any incident, no matter how small, MUST be reported to the Asbestos Coordinator as soon as possible. An incident form should then be completed and any necessary safety measures will then be taken.

More detail as to what to do if known or suspected asbestos is disturbed can be found in the Emergency Procedure.



See Section 10: Emergency Procedure

SECTION 8 – HOW TO MONITOR AND REVIEW THIS PLAN

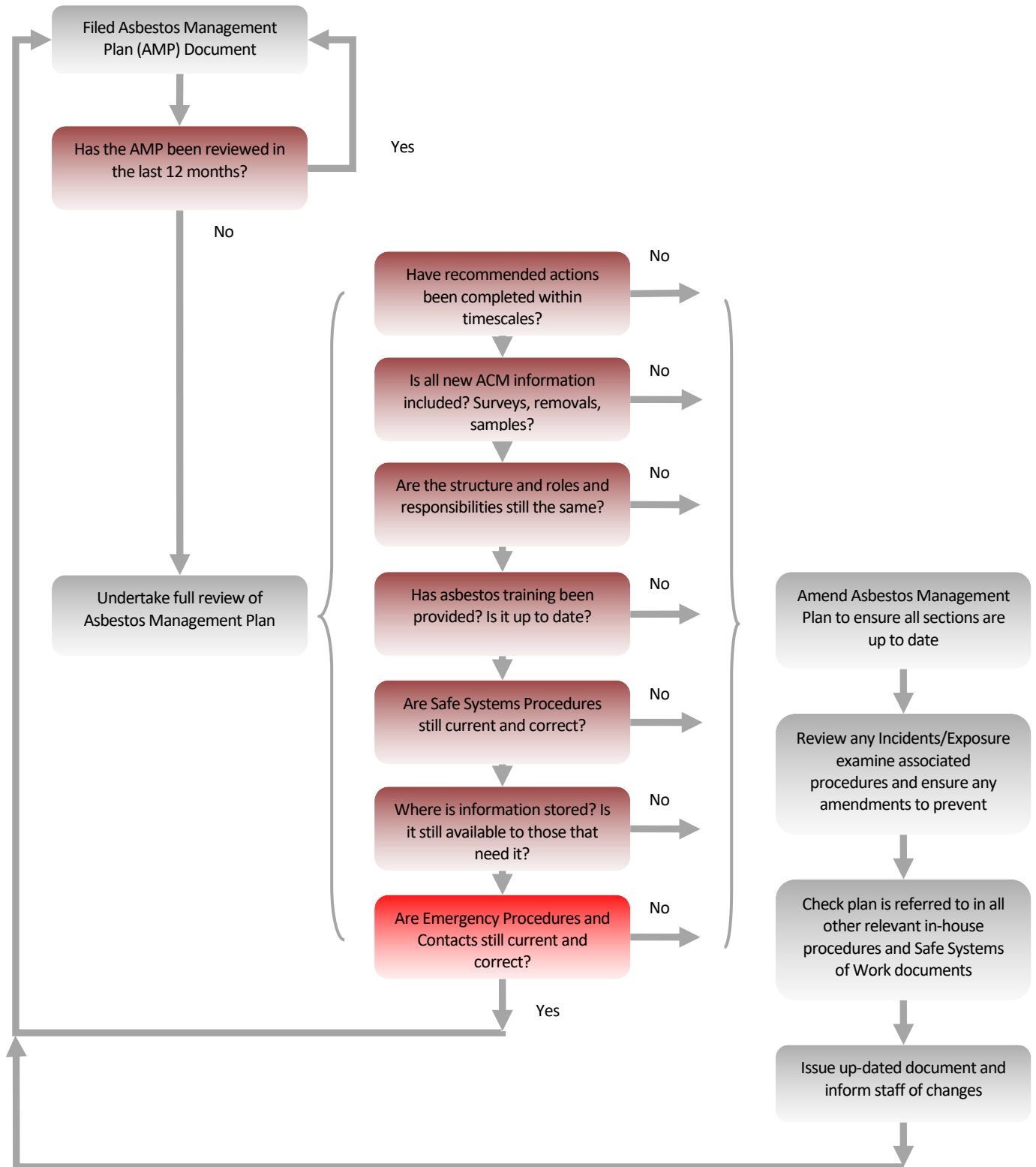
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The key objective of the Asbestos Management Plan is to reduce the risk of exposure. If it can be demonstrated that the risk from asbestos containing materials throughout MHA is under control, this Asbestos Management Plan will be fulfilling its intended purpose.

This Asbestos Management Plan will be reviewed annually by the Asbestos Coordinator to ensure that it remains effective. This may not mean that any changes are necessary, but rather that all current provisions are appraised, checked and audited and that any changes which may make them more efficient are discussed and implemented where necessary.

The procedure in the following flow chart will be undertaken to ensure this remains a valid document and that the risks from asbestos are being adequately assessed:

MONITOR AND REVIEW PLAN: This flow chart summarises steps which should be taken to ensure the management plan is reviewed and remains a valid document.



SECTION 9 – ACTION PLAN

This section details what steps should be undertaken to achieve the goal of effective asbestos management. The detail given here is further to the comments and recommendations given within the Asbestos Registers held.

Short Term Actions

Actions which should be undertaken in the next three months

Action	Timescale	Responsibility	Status
1. Ensure all parties of their responsibilities with regards to asbestos management	Ongoing	Asbestos Coordinator	Ongoing
2. Maintain all asbestos information, removing any cloned properties, updating archetypes, asbestos works undertaken to establish true picture	Ongoing	Property officer / Asbestos Coordinator	Ongoing

Medium Term Actions

Actions which should be undertaken in three to six months

Action	Timescale	Responsibility	Status
1. Update surveys, reinspections, air monitoring, sampling on ActiveH as undertaken	3-6 months	Asbestos Coordinator	
2. Explore BOHS P405 training options for the Asbestos Coordinator	3-6 months	Asbestos Coordinator	

Long Term Actions

Actions which should be undertaken in six to twelve months

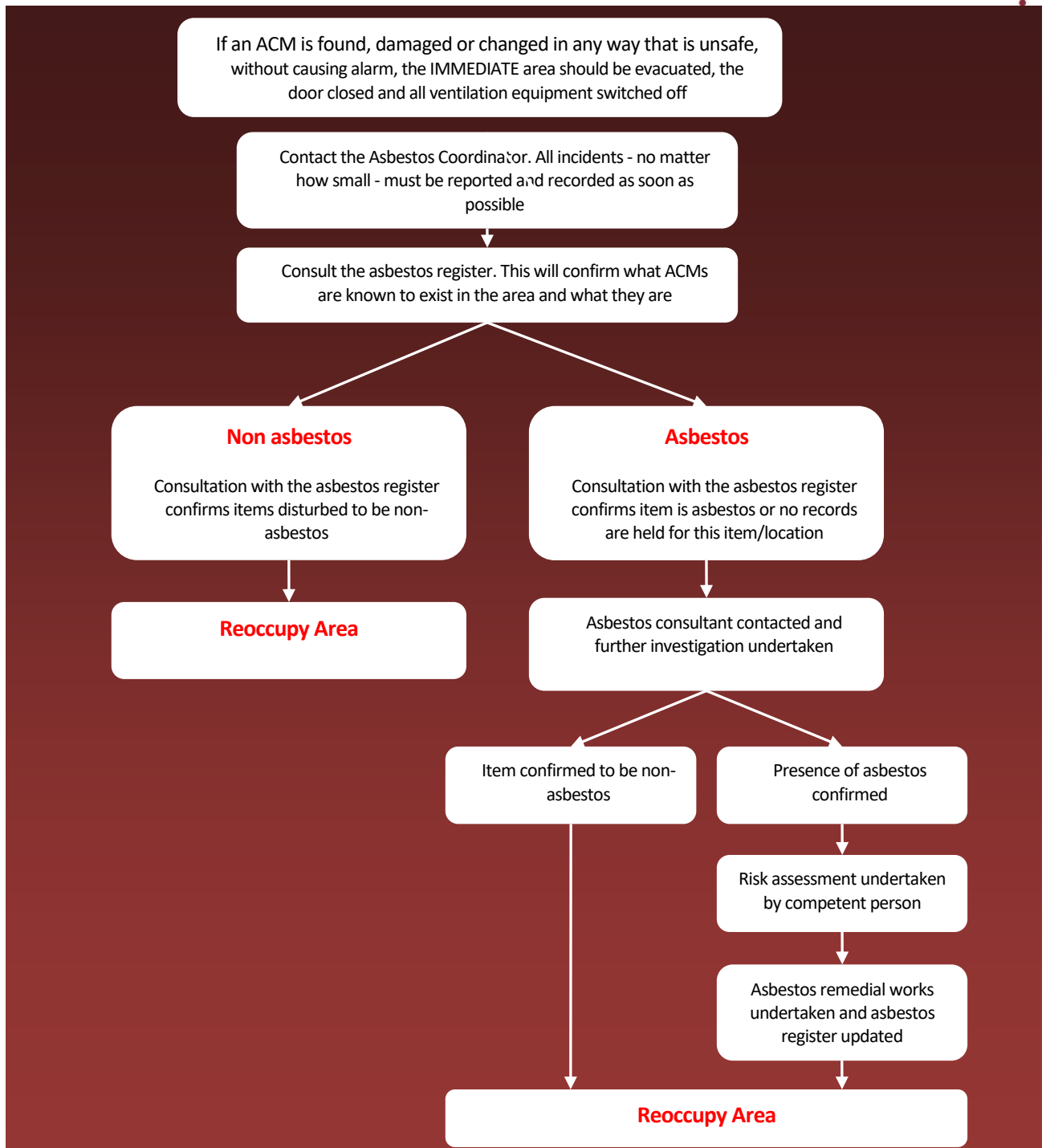
Action	Timescale	Responsibility	Status
1. Remediation of all high risk ACMs as identified in re-inspections and surveys	6 months from date of survey	Asbestos Coordinator	
2. Key personnel to undertake asbestos management training	January 2023	Asbestos Coordinator / Responsible Person / Property Officer	Last carried out January 2021
3. Encapsulation works as identified in re-inspections and survey	12 months from date of survey	Asbestos Coordinator	

On-going Actions

Actions which should be undertaken on an on-going basis

Action	Timescale	Responsibility
1. Review and update of the Asbestos Management Plan	Every 2 years	Asbestos Coordinator
2. Re-inspection surveys	6-12 months	Asbestos Coordinator
3. Asbestos Awareness / Management Training	Every 2 years	Asbestos Coordinator
4. Remediation of all high risk ACMs as identified in re-inspections and surveys	6 months from date of survey	Asbestos Coordinator

SECTION 10 – EMERGENCY PROCEDURES



EMERGENCY CONTACTS

Martin Sloan	0131 561 6485	07702 962 641
Nancy Booth	0131 561 6484	07948 153 692
Out of Hours (Novus)	01506 533 640	

APPENDIX 1 – SURVEY TYPE SPECIFICATION

Management Survey

A management survey is the standard survey. Its purpose is to locate, as far as reasonably practicable, the presence and extent of any suspect ACMs in the building which could be damaged or disturbed during normal occupancy, including foreseeable maintenance and installation, and to assess their condition.

Management surveys will often involve minor intrusive work and some disturbance. The extent of intrusion will vary between premises and depend on what is reasonably practicable for individual properties, i.e. it will depend on factors such as the type of building, the nature of construction, accessibility etc. A management survey should include an assessment of the condition of the various ACM's and their ability to release fibres into the air if they are disturbed in some way. The 'material assessment' will give a good initial guide to the priority for managing ACMs as it will identify the materials which will most readily release airborne fibres if they are disturbed.

The survey will usually involve sampling and analysis to confirm the presence or absence of ACM's. However a management survey can also involve presuming the presence or absence of asbestos.

By presuming the presence of asbestos, the need for sampling and analysis can be deferred until a later time (e.g. before any work is carried out). However this approach has implications for the management arrangements. The duty holder bears potential additional costs of management for some non-ACMs. Any work carried out on 'presumed' materials would need to involve appropriate contractors and work methods in compliance with CAR 2012 irrespective of whether the material was actually an ACM or not. Alternatively, before any work starts, sampling and analysis can be undertaken to confirm or refute the presence of asbestos. The results will determine the work methods and contractors to be used. The 'presumption' approach has several disadvantages: it is less rigorous, it can lead to constant obstructions and delays before work can start, and it is more difficult to control, see *A comprehensive guide to managing asbestos in premises*. 'Default' presumptions may also lead to unnecessary removal of non-ACMs and their disposal as asbestos waste. Default presumptions may be suitable in some instances, eg 'small' or simple premises, as part of a client's management arrangements.

All areas should be accessed and inspected as far as is reasonably practicable. Areas should include under floor coverings, above false ceilings, and inside risers, service ducts, lift shafts etc. **Surveying may also involve some minor intrusive work**, such as accessing behind fascia and panels and other surfaces or superficial materials. The extent of intrusion will depend on the degree of disturbance that is or will be necessary for foreseeable maintenance and related activities, including the installation of new equipment/cabling. Surveyors should come prepared to access such areas (ie with the correct equipment etc). Management surveys are only likely to involve the use of simple tools such as screwdrivers and chisels. Any areas not accessed must be presumed to contain asbestos. The areas not accessed and presumed to contain asbestos must be clearly stated in the survey report and will have to be managed on this basis, i.e. maintenance or other disturbance work should not be carried out in these areas until further checks are made.

Management surveys should cover routine and simple maintenance work. However it has to be recognised that where 'more extensive' maintenance or repair work is involved, there may not be sufficient information in the management survey and a localized refurbishment survey will be needed. A refurbishment survey will be required for all work which disturbs the fabric of the building in areas where the management survey has not been intrusive. The decision on the need for a refurbishment survey should be made by the duty holder.

Refurbishment and demolition surveys

A refurbishment and demolition survey is needed before any refurbishment or demolition work is carried out. This type of survey is used to locate and describe, as far as reasonably practicable, all ACMs in the area where the refurbishment work will take place or in the whole building if demolition is planned. The survey will be fully intrusive and involve destructive inspection, as necessary, to gain access to all areas, including those that may be difficult to reach. A refurbishment and demolition survey may also be required in other circumstances, e.g. when more intrusive maintenance and repair work will be carried out or for plant removal or dismantling.

There is a specific requirement in CAR 2012 (regulation 7) for all ACMs to be removed as far as reasonably practicable before major refurbishment or final demolition. Removing ACMs is also appropriate in other smaller refurbishment situations which involve structural or layout changes to buildings (e.g. removal of partitions, walls, units etc). Under CDM, the survey information should be used to help in the tendering process for removal of ACMs from the building before work starts. The survey report should be supplied by the client to

designers and contractors who may be bidding for the work, so that the asbestos risks can be addressed. In this type of survey, where the asbestos is identified so that it can be removed (rather than to 'manage' it), the survey does not normally assess the condition of the asbestos, other than to indicate areas of damage or where additional asbestos debris may be present. However, where the asbestos removal may not take place for some time, the ACMs' condition will need to be assessed and the materials managed.

Refurbishment and demolition surveys are intended to locate all the asbestos in the building (or the relevant part), as far as reasonably practicable. It is a disruptive and fully intrusive survey which may need to penetrate all parts of the building structure. Aggressive inspection techniques will be needed to lift carpets and tiles, break through walls, ceilings, cladding and partitions, and open up floors. In these situations, controls should be put in place to prevent the spread of debris, which may include asbestos. Refurbishment and demolition surveys should only be conducted in unoccupied areas to minimize risks to the public or employees on the premises. Ideally, the building should not be in service and all furnishings removed. For minor refurbishment, this would only apply to the room involved or even part of the room where the work is small and the room large. In these situations, there should be effective isolation of the survey area (e.g. full floor to ceiling partition), and furnishings should be removed as far as possible or protected using sheeting. The 'surveyed' area must be shown to be fit for reoccupation before people move back in. This will require a thorough visual inspection and, if appropriate (e.g. where there has been significant destruction), reassurance air sampling with disturbance. Under no circumstances should staff remain in rooms or areas of buildings when intrusive sampling is performed.

APPENDIX 2 – ASSESSMENT ALGORITHMS

Material Assessment

Sample Variable	Score	Examples
Product Type (or debris from product)	1	Etonite, cement, lino, paints, artex etc
	2	AIB boarding, gaskets, ropes, textiles etc
	3	Thermal insulation
Extent of damage / deterioration	0	No visible damage
	1	Low damage – e.g. scratches
	2	Medium damage – e.g. breakage of material revealing fibres
	3	High damage – visible debris
Surface Treatment	0	Composite materials – Etonite, vinyl's, painted AC
	1	Enclosed sprays and lagging, encap. AIB, unsealed AC
	2	Unsealed AIB, encap. Lagging and sprays
	3	Unsealed lagging and sprays/debris
Asbestos Type	1	Chrysotile
	2	Amphibole asbestos excluding Crocidolite
	3	Crocidolite
Total Score		

Priority Assessment

Assessment parameter	Score	Examples of score variables
Normal occupant activity		
Main type of activity in area	0	Rare disturbance activity (e.g. little used site room)
	1	Low disturbance activities (e.g. office type activity)
	2	Periodic disturbance (e.g. industrial or vehicular activity which may contact ACMs)
	3	High levels of disturbance, (e.g. Fire door with AIB sheet in constant use)
Score		
Likelihood of Disturbance		
Accessibility	0	Usually inaccessible
	1	Occasionally likely to be disturbed
	2	Easily disturbed
	3	Routinely disturbed
Location	0	Outdoors
	1	Large Rooms
	2	Rooms up to 100m ²
	3	Confined spaces
Extent	0	Small amounts or items
	1	<10m ² or 10m
	2	>10 – 50m ² or 10 – 50m
	3	>50m ² or >50m
Average Score		
Human Exposure Potential:		
Number of occupants	0	None
	1	1 – 3
	2	4 – 10
	3	>10
Frequency of use	0	Infrequent
	1	Monthly
	2	Weekly
	3	Daily
Average time each use	0	<1
	1	>1 - <3 hours
	2	>3 - <6 hours
	3	>6 hours
Average Score		
Maintenance Activity		
Type of maintenance activity	0	Minor disturbance (e.g. possibility of contact when gaining access)
	1	Low disturbance (e.g. changing light bulbs in AIB ceiling)
	2	Medium disturbance (e.g. lifting one or two AIB ceiling tiles to access a valve)
	3	High levels of disturbance (e.g. removing a number of AIB ceiling tiles to replace a valve or for recabing).
Frequency of maintenance activity	0	ACM unlikely to be disturbed for maintenance
	1	≤1 per year
	2	>1 per year
	3	> 1 per month
Average Score		

Category Codes - Material Assessment

Cumulative score	Action Required
10 - 12	This is allocated to those items requiring urgent attention as they currently, or in the foreseeable future, present an unacceptable risk. That is to say that fibre concentrations could rise above 0.01 fibres/ml.
7 - 9	These are items which as single entities have a high risk of being damaged/disturbed or where there is an accumulation of asbestos materials in a single location that when examined as a whole have a high risk of being damaged/disturbed. The main difference between Cat A and Cat B is that Cat A materials are currently in a state likely to expose people whereas Cat B items may show signs of historic damage but this damage has been made good and debris cleared up.
4 - 6	These are items that have no or very little, sign of historical damage and are usually board or panels, which are not easily accessed.
0 - 3	This covers asbestos cement, resins, artex, plastics, rubber etc containing asbestos, which do not generally present a significant risk.

Category Codes - Priority Assessment

Cumulative score	Action Required
10 - 12	This is allocated to those items found in locations that present an unacceptable risk to occupiers etc.
7 - 9	These are items situated in high use, readily accessible positions, which may also be located in an area accessed on a routine basis for maintenance.
4 - 6	These are items that will very rarely be disturbed through normal occupation or maintenance, or are in locations or extents that if disturbed would lead to a minimal fibre release.
0 - 3	This covers items that are in locations not readily accessible and are unlikely to be disturbed.

Risk Assessment Summary

For each ACM:

MATERIAL ASSESSMENT + PRIORITY ASSESSMENT = RISK ASSESSMENT



- High risk** (Total score = 19- 24)
- Medium risk** (Total score = 13- 18)
- Low risk** (Total score = 8- 12)
- Very low risk** (Total score = 0- 7)

N.B. The colours used on this chart should be used as an additional guide; the Risk Assessment score of a particular item of asbestos should be the basis for assessing possible asbestos management options.

APPENDIX 3 – GLOSSARY OF TERMS

ACM: Asbestos Containing Material. A complete definition as to the percentage and type of asbestos content is given in the Asbestos Register.

AIB: Asbestos Insulation Board. This product is a lightly compressed board made from asbestos fibre and other filler materials.

ACOP – Approved Code of Practice: Guidance document giving advice on the preferred means of compliance with the Control of Asbestos Regulations 2012. Two ACOPs, L127 (The management of asbestos in non-domestic premises) and L143 (Work with materials containing asbestos) have been consolidated into the single revised ACOP L143 (Managing and working with asbestos – second edition).

Asbestos: A naturally occurring, fibrous, silicate mineral. The Control of Asbestos Regulations, 2012 refers to any material or product containing any of the asbestos types.

Asbestos Register: A summary list of all identified items containing asbestos, their condition, location, any comments or recommendations and the type and extent of asbestos present. These documents are produced after an asbestos survey and should contain all analytical results, drawings, and a full introduction and methodology.

Control measure: Something that will *reduce* the risk posed by that hazard.

Date for Action: This details the timescale that remedial option should be undertaken. As and when any works are undertaken, all Asbestos Records must be updated.

Encapsulation – Recommendation: Some exposed or damaged asbestos material may require encapsulation that can significantly reduce the risk posed by the material. Once encapsulated it may be suitable to simply manage the asbestos through an effective reinspection regime. The re-assessment of the material will dictate this outcome.

Extent: Indicates the length, volume, or area of the asbestos containing material.

Hazard: Something that has the *potential* to harm a person or persons.

Identified Asbestos: Refers to a brief description of the material found to contain asbestos.

Location: The exact location of the asbestos – the original survey report should be consulted to give more detailed information.

Manage – Recommendation: Asbestos that is in good condition and is unlikely to be disturbed can be simply managed. However an appropriate reinspection regime will still need to be implemented to ensure that the condition of the material or building use does not change.

Material Assessment: assesses the type and condition of the ACM and the ease with which it will release fibres if disturbed.

MMMF: Man Made Mineral Fibre. These products are often used as an asbestos alternative, and include products such as fibreglass.

PPE – Personal Protective Equipment: refers to protective clothing (coveralls), hard hats, goggles, safety boots or other gear designed to protect the wearer's body or clothing from injury.

Priority Assessment: assesses the likelihood of someone disturbing the ACM.

Removal – Recommendation: This indicates that, based on the assessment conducted, the recommended approach is to have the asbestos physically removed. Recommendations are based on the parameters available at the time. New information or a change in circumstance may alter these recommendations. All products falling under the Asbestos Licensing Regulations will require a licensed contractor.

Risk: The *likelihood* of that hazard causing harm.

Risk Assessment: Risk rating given to each identified item of asbestos which incorporates factors such as the location and condition of the material, its likelihood of being disturbed, the materials use, and an indication of how urgent any remedial works may be.

Risk Score: This is the overall risk score that has been derived for completing and adding together of the Material and Priority Assessments. It states the overall risk that the item of asbestos represents in terms of likelihood of exposure.

RPE – Respiratory Protective Equipment: refers to protective equipment worn to protect the respiratory system (for example, half mask, and full face mask).