

Date Issued	December 2011
Last Reviewed	December 2021
Department	Asset Management
Title	Asbestos Management Policy
Objective	This policy establishes clear guidelines to be adopted whenever Asbestos Containing Materials (ACM's) are found in premises we own or occupy. The policy will also ensure compliance with appropriate legislation and will apply where anyone acting on our behalf is working in premises not owned by us.
Responsible	Director of Asset Management
Next Review Date	December 2026

1.0 ASBESTOS POLICY

- 1.1 We undertake to fulfil our duties and reduce the risk of exposure to asbestos, as far as is reasonably practicable, of our employees, tenants, and contractors working on our behalf and of any other persons who may potentially be exposed to asbestos within our premises.
- 1.2 We have drawn up an Asbestos Management Plan, **Appendix 1**.
- 1.3 We shall:
 - Carry out a systematic programme of surveys to identify ACM's in all our properties through the engagement of an experienced asbestos surveying company who can demonstrate a track record of asbestos survey commissions following the guidelines of the HSE document HSG264 - "Asbestos the Survey Guide" 2012.
 - Compile and maintain a comprehensive Asbestos Register
 - Update and amend the Asbestos Register as necessary after any survey, treatment or removal of ACM's
 - Assess the risk from any ACM's identified in our properties

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- Develop and implement arrangements to manage the risk arising from any ACM's identified and ensure that these are carried out
- Provide information about the presence, location and condition of ACM's to employees and any other persons who are liable to disturb ACM's, including contractors and tenants
- Ensure that the appropriate actions are taken by any persons who are likely to disturb ACM's including employees and contractors
- Ensure that all work involving ACM's is carried out in compliance with current legislation, guidance notes and codes of practice issued by the Health and Safety Executive (HSE) and other authoritative sources
- Report all work involving ACM's to the Asset Manager prior to commencement of the works. An assessment of the work and a method statement for its execution is required for all work involving ACM's. If the work is of a repetitive nature, one generic method statement will be acceptable. Method statements must be approved by the Asset Manager prior to work commencing
- Ensure that all work involving ACM's is carried out, where appropriate, by approved licensed asbestos contractors
- Consult with tenants, employees and other appropriate groups prior to any large scale removal of ACM's
- Instigate a robust monitoring scheme for recording the performance of contractors employed in the removal/treatment of ACM's
- Publish our Policy on Asbestos Management and make the information contained in the Asbestos Register available to employees, tenants and contractors acting on our behalf

1.4 With regard to our employees, we shall:

- Appoint a "Dutyholder" to control the management process. This will be our Asset Manager
- Provide adequate training according to the duties of the post, see **Appendix 3**, "Training Programme" and **Appendix 4**, "Guidance for Staff"
- Provide adequate supervision
- Ensure that, where required, appropriate equipment is provided

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- 1.5 Following the introduction of regular re-inspections of areas where ACM's were known or suspected to be present, the information held on our stock with regard to the presence of ACM's is now of a good standard. Annual inspections of these ACM's will be carried out and these will be supplemented by ad hoc inspections as required.
- 1.6 Where a survey has not been carried out, we will assume that all non recognisable materials and fittings are ACM's. We will act in accordance with this assumption and instruct contractors accordingly.
- 1.7 The Director of Asset Management is responsible for the implementation of this policy.

2.0 MANAGEMENT

- 2.1 As stated in 1.4 above, the "Dutyholder" responsible for the management of the process is our Asset Manager. The "Dutyholder" shall:
 - Be the first point of contact for all matters relating to ACM's
 - Provide an internal source of information on all items relating to ACM's
 - Manage and co-ordinate asbestos surveys
 - Manage and maintain the Asbestos Register, including:
 - Co-ordinating the input of new survey data
 - Co-ordinating the updating of existing records to include all remediation works carried out
 - Ensure initial surveys are carried out within timescales
 - Co-ordinate the procedures for informing persons at risk as identified in this document
 - Liaise with internal and external contacts, surveyors, suppliers and contractors to provide a comprehensive Asbestos Register, capable of providing all information required by us to comply with this policy
 - Be the point of focus within the Association for all matters relating to ACM's and the Asbestos Register

3.0 IDENTIFICATION OF ASBESTOS CONTAINING MATERIALS

- 3.1 Following recent surveys of our stock, we have good information on the location and type of ACM's present within our properties.
- 3.2 We will commission further surveys where the presence of ACM's is suspected.

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- 3.3 We will continue with our programme for ongoing monitoring inspections of ACM's in accordance with the recommendations of the initial survey reports.
- 3.4 We will maintain an up to date record of the location, condition and removal of all ACM's within our properties. This Asbestos Register will hold the following information for all properties:
- Location of all presumed ACM's
 - For all ACM's identified after testing:
 - Product/material
 - Asbestos type
 - Approximate quantity of material
 - Details of Risk assessed
 - Recommendations for management
 - Sketch plans showing location
 - In addition, the Asbestos Register will record:
 - Where remedial works have been carried out
 - The results of any air tests conducted in properties
 - Any inaccessible areas at the time of the survey
- 3.5 We will ensure that these records are updated to include the results of additional surveys, re-surveys and any works undertaken to repair, seal or remove ACM's.
- 3.6 The Asbestos Register will be updated within 10 working days of new data being received by our Asset Management Team.
- 3.7 Where areas have been inaccessible at the time of a survey, we will, where practicable, re-survey these areas to establish the presence or absence of ACM's.
- 3.8 We will continue to review and revise our Asbestos Management Plan, **Appendix 1**, on a regular basis to manage the risks arising from the presence of ACM's.

4.0 MANAGEMENT OF ASBESTOS REGISTER

- 4.1 In managing ACM's it is crucial to have a comprehensive, up to date and "user friendly" Asbestos Register that is readily available to those who work with and live in our properties. The Asbestos Register is available within our core housing management system, SDM.

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4.2 We will develop our database, SDM, to take advantage of any improvements to the software to improve access to the Asbestos Register.

5.0 INFORMING PERSONS AT RISK

5.1 We acknowledge that we have a responsibility to protect not only our own staff but also any other persons who may potentially be exposed to asbestos within our properties.

5.2 We have procedures in place to ensure that all persons at risk are provided with adequate information to ensure that the potential for exposure to ACM'S is reduced as far as is reasonably practicable.

5.3 All staff who may potentially be exposed to ACM's will receive regular training updates appropriate to the type of work in which they are employed. See **Appendix 3**, "Training Programme".

5.4 We provide leaflets containing general information about ACM's and the possible dangers that exist, see **Appendix 2**, "What is Asbestos?" and **Appendix 5**, "Your Guide to Asbestos, Home Safety Information for Tenants". The latter leaflet is available to all tenants and forms part of the welcome pack for new tenants moving into properties built before 1999.

5.5 We will advise all tenants that specific information about ACM's within individual properties may be obtained from us.

5.6 When information is requested by a tenant:

5.6.1 Where a survey has been carried out; we will provide the information available from our Asbestos Register. This will include:

- Where ACM's, if any, have been identified
- Any areas not surveyed due to being inaccessible
- The Risk Assessment for any identified ACM's and what this means
- Our plans for dealing with the ACM's
- A statement that no work should be undertaken or alterations made which are likely to result in disturbance or damage to ACM's

5.6.2 Where no survey has been carried out; we will provide a written statement detailing:

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- That the property has not been surveyed. Any information on ACM's available from dwellings of a similar age and type in the same area will be provided
- The Risk Assessment for any identified ACM's in these similar properties and what this means
- Our plans for dealing with the ACM's in the similar properties
- A statement that no work should be undertaken or alterations made which are likely to result in disturbance or damage to ACM's

5.7 We will note the presence of asbestos on all works orders issued to contractors acting on our behalf. All contractors will also have access to the Asbestos Register through our Asset Management Department. These contractors will be expected to follow the procedures in place for managing asbestos.

6.0 STAFF TRAINING

6.1 All staff who are, or who are likely to be, at risk of exposure to ACM's will be given instruction on the Policy and Procedures adopted by us for the management of asbestos and ACM's.

6.2 This training will reflect the type of work the staff member undertakes.

6.3 We will regularly review our training programme and will adapt it as required.

7.0 ASBESTOS REMOVAL CONTRACTORS

7.1 We will ensure that all work involving asbestos will be carried out by specialist contractors licensed by the HSE to carry out such works.

8.0 EMERGENCY PROCEDURES

8.1 We will implement procedures for incidents where there is a risk that a person is or has been exposed to asbestos.

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8.2 The Asbestos Register will include a logbook to record reports on all asbestos incidents. This will include location, nature of incident, details of those involved, a summary of the actions taken and any recommendations for changes to practice/procedure in light of the incident.

8.3 We will regularly review and update our procedures taking cognisance of any incidents reported in the logbook.

9.0 HEALTH RECORDS AND MEDICAL MONITORING

9.1 In the event that an employee is exposed to asbestos, we will:

- Maintain a health record for that employee containing the relevant information
- Ensure that the employee is under adequate medical supervision
- Provide counselling

10.0 ONGOING MONITORING

10.1 We will ensure that the systems and procedures outlined in this document are implemented and monitored.

10.2 The Director of Asset Management will review the Policy every 5 years and make amendments as necessary to ensure that the systems and procedures are implemented effectively. All reviews will normally be presented to the Management Committee for approval.

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Asbestos Management Plan

November 2021

1. Location and Condition of Asbestos

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Existing information regarding the location and condition of asbestos containing materials at any of our properties is held on an Asbestos Register controlled by our Asset Manager.

This Asbestos Register contains the information on a database which can be accessed by all our staff.

The Asbestos Register is updated through the implementation of a systematic programme of surveys to identify Asbestos Containing Materials (ACMs) in our properties through the engagement of an experienced asbestos surveying company. This company has demonstrated a track record of asbestos survey commissions following the guidelines of the HSE document HSG264 – ‘asbestos the survey guide’ 2012.

Annual surveys are undertaken to re-inspect areas of our stock, exclusively the Large Scale Voluntary Transfer (LSVT) stock where we are aware that we have ACMs in our properties. Additional ad hoc surveys are carried out as identified and required as part of our on-going property maintenance and improvement programmes. All updates from these re-inspections and ad hoc surveys are incorporated into our Asbestos Register.

2. Material and Priority Assessments

As part of all ACM inspections, a risk assessment score for each ACM is produced taking into account a Material Assessment (product type, damage/deterioration, surface treatment, asbestos type) and a Priority Assessment (location, material extent, use of location, occupancy level, activities carried out, likelihood/frequency of maintenance activities).

This risk assessment then forms the basis of how the ACM is managed and the control actions necessary.

3. Action Plan and Identified Asbestos

Where ACMs have been identified, that information is incorporated into the Asbestos Register which is kept, maintained and co-ordinated by our Asset Manager.

Where no information regarding asbestos containing materials is available, it is presumed that ACMs exist unless there is strong evidence to suggest otherwise e.g. date of construction.

4. Long Term Asbestos Management

The overall aim is to ensure that all asbestos containing materials, through re-inspections, remedial or removal works, are effectively managed and risk is reduced to its lowest practical level.

5. Monitoring and re-inspection regime

All asbestos containing materials will be re-inspected at intervals determined by risk assessment, and inspections will be carried out by competent persons. This information will be used to update the asbestos register.

6. Training

Appropriate training will be provided, where required, to staff whose normal duties may bring them into contact with asbestos containing materials.

7. Responsibilities

The responsibility of the 'Duty Holder' under the Control of Asbestos at Work Regulations 2012 (CAR 2012) falls to ELHA as Landlord. This function falls under the ELHA Asset Manager's remit.

8. Dissemination of information

The Asbestos Register is accessible to all our staff through our Housing Management system, SDM.

Contractors who visit any of our premises follow procedures that involve referencing the relevant section of the Asbestos register.

Our maintenance contractors, consultants and contractors engaged in carrying out our Planned and Cyclical Maintenance Programmes have direct access to our Asbestos Register.

9. Emergency Procedure

If anyone suspects that an asbestos containing material has been disturbed the following action should be taken immediately:

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- Evacuate the area within which the material is located and cordon or lock off the area until a full assessment has been completed
- Report the incident immediately to the Asset Manager or, in their absence, their deputy or line manager
- Consult the Asbestos Register for that area
- Ensure a full assessment of the situation is carried out by a competent person
- Record, if possible, the names of all persons potentially affected
- Do not allow anyone to enter the cordoned/locked off area until it has been established that no ACMs are present, or that any ACMs found have been removed and that the area has been provided with a valid 'air clearance certificate' (to be provided by the ACM removal contractor).

10. Monitoring and Review

The Asbestos Management Plan will be reviewed on a 5 yearly cycle or as otherwise required following legislative changes.

Asbestos Management Plan

What is Asbestos?

Asbestos is a mineral that is resistant to heat and fire, it does not rot, it does not burn and it is not attacked by weather. This is one of the main reasons why it was used in buildings and in hundreds of products from paints to insulation boards to fire curtains.

There are three main types of asbestos: Crocidolite (blue), Amosite (brown) and chrysotile (white), however it is not possible to tell whether a product contains asbestos by its colour.

Asbestos is made up of tiny fibres that can only be seen under the microscope. These fibres can penetrate deep into the lung and stay there which can cause respiratory disease or some types of cancer, the principal asbestos related diseases being; asbestosis, mesothelioma and lung cancer.

As mentioned above, asbestos is found in a variety of products, also known as Asbestos Containing Materials or ACM's. The most common materials used in buildings which may contain asbestos are:

- Floor tiles
- Wall boards
- Artex (textured) ceiling finishes
- Some plaster finishes and wall boards
- Sprayed coatings to pipe work
- Lagging around pipe work and hot water cylinders
- Water tanks
- Lining boards on the back of boiler or service cupboard doors
- Inside electrical distribution boards and fuses
- Bath Panels
- Internal window cill boards
- Corrugated cement roofing sheets (often found on garages and outhouses)
- Artificial slate roofs
- Gutters and rainwater pipes

Asbestos Management Plan

Training Programme

The following training, to be carried out by the Association's consultant, will be scheduled as part of the Associations training plan. New staff will be trained as appropriate as part of their induction programme.

Housing Management and Care & Repair Staff

Asbestos Awareness
Reporting Procedures

Asset Management and R3 Office Staff

Asbestos Awareness
Reporting Procedures
Correct Working Methods

R3 and Care & Repair Operatives

Asbestos Awareness
Reporting Procedures
Correct Working Methods
Minor Repairs

Asbestos Management Plan

Guidance for Staff

We have adopted an Asbestos Policy & Management Plan, the principal points of which in relation to our staff and Tenants are that we will:

- Carry out an annual re-inspection of areas where we know we have Asbestos Containing Materials (ACM's) in our properties and related assets through the engagement of an asbestos surveying company
- Carry out ad hoc surveys where the presence of ACM's is suspected, take appropriate action and update our Asbestos Register appropriately
- Maintain our comprehensive Asbestos Register
- Publish our Policy on Asbestos and make the information contained in the Asbestos Register available to employees, tenants and contractors working on our behalf
- Provide information about the presence, location and condition of ACM's to employees and any other persons who are liable to disturb ACM's, including contractors and tenants
- Provide an information leaflet for tenants containing general information about, and danger from, asbestos

The leaflet **'Your Guide to Asbestos, Home Safety Information to Tenants'** has been produced. It is available to all existing tenants of any of our properties which were built before 1999. It will also be included in the information pack for all new tenants of properties built before 1999 and be available on our website and at our reception

- Advise all tenants that specific information about asbestos within individual dwellings may be obtained on application to us

As part of the Asbestos Management Policy, we have appointed our Asset Manager as our "Duty holder." This person will be the holder of the post of Asset Manager. In addition to maintaining the Asbestos Register, the Duty holder will:

- Maintain the Asbestos Register
- Be the initial point of contact for all matters relating to ACM's and queries from staff
- Provide an internal source of information and advice to staff on all items relating to asbestos

- Give advice, where appropriate, about working with asbestos when encountered in the delivery of the Planned Maintenance Programme, Response Repairs and Cyclical Maintenance Programmes
- Seek advice and discuss detailed asbestos issues, when required, with our asbestos consultant

Asbestos



Asbestos in buildings

Any homes built before 1999 may have some building materials in them which contain asbestos. These materials are known as Asbestos Containing Materials or ACMs for short.

Is this a problem?

It shouldn't be if the material is in good condition, but when ACMs age or become damaged they can release asbestos fibres into the air. Asbestos fibres in the air can be inhaled into the lungs where they may stay for a long time, and can cause damage or disease.

People who have worked with asbestos for many years as part of their job, or have washed the dusty clothing of those who worked with asbestos, are most likely to be affected.

Is everyone exposed to asbestos?

Yes, there is a very low level of asbestos fibres in the air everywhere because asbestos has been used widely. Exposure to this low level of asbestos is unlikely to harm people's health.

It is also very unlikely that the levels of asbestos fibres found in buildings will be harmful, but if you have damaged ACMs in your home you should seek advice on what to do. What you should not do, is carry out any DIY work to anything that you think might be an ACM. Particularly anything which produces dust, for example: sanding or drilling.

How do I know if I have ACMs in my home?

Since 1976 British manufacturers have put labels on their products to show they contain asbestos, and since 1986 all products containing asbestos carry a European identifying label. If you are in any doubt, our Property Officer will be able to help identify if you have ACM's in your home.

Remember, ACMs can look very similar to those not containing asbestos – if in doubt please seek advice.

Where might I find ACMs in my home?

ACMs were widely used from 1930 to around 1980, particularly from the 1960s onwards. The use of asbestos decreased greatly around the mid-1980s, and since 1993 its use in most products was banned with a final ban in 1999. If your home was built after 1999 it should be free of ACMs.

It is not always easy to tell whether a product contains asbestos as modern asbestos-free materials often look similar - remember it is usually older products that contain asbestos.

The types of ACMs that may be found in homes are described below:

Heating appliances and domestic equipment

Asbestos was used in some warm air heating systems and electric storage heaters up to 1976, in some gas heaters up to 1988, and some early 'coal effect' gas fires

"Artex" and Flooring

Asbestos was used in decorative coatings such as textured paints and plasters, eg: "Artex". These kinds of finishes are still widely used but the use of asbestos in them has not been allowed since 1988. Plastic floor tiles may also contain ACMs but only if they are very old.

Asbestos cement products

Asbestos-cement was the most widely used asbestos material. It is found in many types of building as corrugated sheets for roofing and wall-cladding, in flat sheets and partition boards for linings to walls and ceilings, in bath panels, soffit boards, fire surrounds, flue pipes, cold water tanks and as roofing tiles and slates, guttering and drain pipes. Use declined significantly from 1976.

Asbestos cement products are very unlikely to release high levels of fibres because of the way they are made, unless they are subject to extreme abrasion such as sanding or drilling.



What should I do if I think I have ACMs in my home?

ACMs in good condition that cannot readily be damaged are often best left where they are, as removal can lead to higher levels of fibres in the air.

If you are planning some DIY work or are having some work done to your home and you think you have ACMs in the way, contact us for advice. You should always let your builders know if you have any suspicions, before they start work.

Damaged ACMs

ACMs that are slightly damaged can sometimes be repaired by sealing or enclosing the material. Get advice from one of our Property Officers, they will know what to do.

ACMs that are badly damaged or deteriorating can release dust and should be removed. If you think you have badly damaged ACMs in your home, contact us straight away so a Property Officer can come out and inspect it.

Finally

Asbestos can only be dangerous if you breathe in a lot of the dust particles. If the asbestos is in good condition, there is no reason to worry about it being in your home. Only if it is damaged should you contact a Property Officer, who will come out to inspect it and will decide what needs to be done.

Whatever you do, if you think you have ACMs in your home, don't sand or drill them as that will produce dust and fibres that may be harmful if you breathe them in.

If in doubt, log into your **My Home** account and request a Property Inspection, or contact us by phoning on 01620 825032, by e-mailing enquiries@elha.com or by visiting elha.com and clicking on the Need Help button.



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