

1. PURPOSE

1.1 To set out GWAH plans for ensuring the safety of tenants, residents and staff and compliance with the Control of Asbestos Regulations 2012. The Asbestos Management Plan (AMP) is a health and safety requirement and it encompasses the whole of the housing stock, including commercial premises and offices. It is guided by legislation, regulations and good practice.

2. CONTEXT

- 2.1 Asbestos-containing materials (ACMs) were used for a wide range of construction purposes in new and refurbished buildings until 1999 when all use of asbestos was prohibited. This extensive use pre-1999 means there are still many buildings in the UK with ACMs.
- 2.2 Where ACMs are in good condition and unlikely to be disturbed they do not present a risk. However, where the materials are in poor condition or are disturbed or damaged, asbestos fibres may be released into the air, and, if inhaled, may cause serious lung disease, including cancer, more commonly known as Asbestosis.
- 2.3 In 2003, in preparation for the Asbestos Control Regulations 2004, an independent comprehensive asbestos audit was carried out by GWAH; recording 100% compliance within the general housing stock (i.e. there is no ACMs) and a low risk incident (cement: external pipework) at the office premises. Systems are in place to contain this risk. Following stock transfer, GWAH carried out surveys of both common areas and sample houses to the Hyndland & Argyle stock, in 2009 & 2011 respectively, and identified the presence of asbestos (e.g. hall cupboards/ceilings, common areas). This led to the establishment of comprehensive monitoring arrangements including information sharing with contractors and agents and advice to residents to mitigate the risk.
- 2.4 A systems review in late 2012 and subsequent 2014¹ Asbestos Management Plan (AMP) outlined existing mitigation strategies in respect to The Control of Asbestos Regulations 2012; to deliver robust recording, monitoring and compliance framework across GWAH stock profile in line with Approved Code of Practice².

3.0 AIMS

- 3.1 To ensure, as far as is reasonably practicable, that GWAH carries out its operations in a manner that does not affect the health, safety and welfare at work of employees, tenants and others³
- 3.2 To demonstrate compliance with legislation, regulations, best practice and guidance.
- 3.3 To establish robust management systems which ensure transparency, integrity and accountability.
- 3.4 To minimise risk to GWAH.

4.0 ASBESTOS MANAGEMENT PLAN

4.1 Asbestos Management

- 4.1.1 Asbestos surveys will be carried out by competent individuals/companies, accredited by the British Occupational Hygiene Society (P402 qualified surveyor). Testing of samples will be carried out by a United Kingdom Accreditation Service (UKAS) accredited company. GWAH tendered for asbestos testing in common areas in 2019 and will follow up on any actions required.
- 4.1.2 Where notifiable, GWAH will ensure works likely to disturb or remove asbestos are carried out by a Health and Safety Executive (HSE) licensed asbestos removal contractor ensuring notification by the contractor to the HSE a minimum of 14 days prior to the start of the work. Prior to any contract award, the sampling contractor must provide confirmation of the following:
- (a) current asbestos license issued by HSE;
 - (b) Insurance Certificate indicating cover for asbestos works;
 - (c) relevant qualifications and Personal Protective Equipment (PPE) for all personnel working at the site;
 - (d) risk assessment/method statement. (RAMS)
- 4.1.3 Whether a type of asbestos work is licensable, Notifiable Non-Licensed Work (NNLW) or non-licensed, will be determined in each case and will depend on the type and extent of work, the type of material and its condition. The identification of the type of asbestos-containing material (ACM) and an assessment of its condition will be key parts of the risk assessment and will be completed prior to work commencing.

¹ R6 MC (16/09/14)

² Health & Safety Executive [ACOP 2013](#)

³ Tenants, visitors, service users, contractors and members of the general public.

- 4.1.4 Written records will also be kept of non-licensed work of lower risk ACMs (e.g. asbestos cement and asbestos textured coatings) which does not require HSE notification. For example, a preconstruction information pack including a copy of the notification with a list of workers on the job, plus the level of likely exposure of those workers to asbestos. In these cases a safe system of work and risk assessment are still required and must be agreed by the PSM (or another competent person).
- 4.1.5 In cases of final demolition or major refurbishment of premises, the plan of work will specify that asbestos must be removed before any other major works begin, unless removal would cause a greater risk to employees than if the asbestos had been left in place. Any waste removed will be treated as 'Special Waste' and be disposed of in accordance with legislation⁴.

4.2 Asbestos Register

- 4.2.1 The Asbestos Register (AR) records the location of all known or suspected ACMs, whether identified from stock surveys, or at suspected locations, for non-domestic common areas (e.g. tenement closes) and commercial premises. As a measure of good practice⁵, the AR will also record known information for domestic properties (i.e. individual flats).
- 4.2.2 The AR contains, at a minimum, the following information: property address; location of ACM; type and extent of ACM; condition and surface treatment of ACM; risk assessment for ACM; process for management of the ACM and where available, identify electronic file location of associated detailed reports / plans and photographs.
- 4.2.3 Where the presence of ACMs is unknown GWHA AR indicates that that it should be assumed present and appropriate precautions taken to ensure not disturbed.

4.3 Staff Training

- 4.3.1 Any staff liable to be exposed to asbestos, or who supervise those employees, will receive relevant Asbestos Awareness training. Refresher training will be provided as appropriate.
- 4.3.2 All staff receive annual Health & Safety training which is delivered by the Estates Coordinator.

4.4 Roles and Responsibilities

- 4.4.1 The Property Services Manager (PSM) has responsibility for ensuring compliance with statutory requirements and for the implementation, monitoring and review of the AMP.
- 4.4.2 The PSM is responsible for the development and ongoing monitoring of the Asbestos Register (AR) and for ensuring procedures are in place for dissemination of information at an operational level, including to contractors and other agents acting on behalf of GWHA.
- 4.4.3 The day-to-day management of the register will be undertaken by Property Services / Projects Officers, as appropriate in course of their respective duties.
- 4.4.4 The Health & Safety Administrator is responsible for compliance with H&S legislation within the team and will be kept informed of risk assessments, method statements etc.
- 4.4.5 No GWHA staff must ever handle damaged or cracked ACMs or seek to remove them

4.5 ACM Notifications

- 4.5.1 Information from the Asbestos Register will be made available to contractors, and other agents operating on behalf of GWHA. Where GWHA appoints a multi-trade contractor protocols will be agreed to ensure transparent operation and compliance with the Asbestos Management Plan.
- 4.5.2 Prior to commencement of planned works, the Property Services & Projects Officers will hold a pre-start meeting with appointed contractor. There will be an agenda item for Health & Safety and within this the current Asbestos status will be discussed to confirm:
- (a) location of known ACMs;
 - (b) the potential for exposure;
 - (c) level and extent of exposure.
- 4.5.3 With regard to response repairs, the Asbestos Register is made available to the contractors and they should notify GWHA of any variation on our records.

⁴ Special Waste Amendment Regulations 2004

⁵ No current legal requirement

- 4.5.4 For refurbishment/demolition or repair works on building fabric not known to contain ACMs, a Refurbishment and Demolition Survey will be instructed, with appropriate precautions to reflect.
- 4.5.5 In line with our Code of Conduct contractors will be expected to notify GWHA of any suspected ACMs identified during works (e.g. tenant applied textured coatings) to enable the PSM to determine the most appropriate course of action, which may include seeking specialist advice.
- 4.5.6 If contractors find ACMs where GWHA were previously unaware of them, tenants will be notified of the asbestos and provided with the factsheet.
- 4.5.7 During work in void properties, labels will be placed to notify where ACMs are present.

4.6 Communication – Resident Engagement

- 4.6.1 General communication and awareness raising of ACMs will be a regular feature in the Newsletter.
- 4.6.2 Communication around ACMs will be tailored to tenants/residents involved in improvement projects.
- 4.6.3 New tenants will be informed to the presence of ACMs in the property at the time of signing the tenancy and will be asked to sign a mandate, with an accompanying fact sheet, confirming awareness of asbestos in their home.

5.0 REVIEW

- 5.1 This plan will be reviewed every 5 years, or sooner, subject to a change in legislation or circumstance.

6.0 DELEGATED AUTHORITY

- 6.1 Delegated authority is granted by the Management Committee to the Chief Executive and Staff to implement this Policy and the associated procedures.