

ASBESTOS SAFETY POLICY

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1. Our purpose

We're proud to be able to support tens of thousands of people across England by providing affordable housing and care to help people live independently.

Everything starts at home, and we are privileged to be able to do work which makes a real difference to the lives of people in our communities. Everything we do is about people – whether that's providing a good quality, safe home or providing care which helps someone to live an independent life.

We live and breathe this social purpose.

2. Introduction

2.1. This policy sets out GreenSquareAccord's (GSA's) commitment to fulfil its duties to ensure that customers, colleagues, contractors and all others having cause to enter or work upon our properties are not exposed to risks to their health from asbestos containing materials (ACMs).

2.2. It is supplemented by associated Asbestos Safety Procedures which set out the details of how this policy will be delivered.

- 2.3. We aim to obtain and hold information concerning ACMs in our properties which is complete and accurate. We will use this information to avoid, so far as reasonably practicable, the exposure of customers, colleagues and contractors to asbestos fibres through regular checks on the condition of ACMs.
- 2.4. We aim to effectively manage risks from ACMs across the GSA portfolio, ensuring colleagues and contractors understand their role and responsibilities in order to keep themselves and our customers safe and to ensure our statutory obligations are met following the requirements set out in the Control of Asbestos Regulations 2012.
- 2.5. We aim to minimise the risk of asbestos being disturbed during maintenance and building work, in particular by providing information to contractors and other parties in accordance with the Construction (Design & Management) Regulations 2015.
- 2.6. We aim to ensure that works to remove ACMs are carried out in accordance with best practice using contractors holding a licence to work with (either removal or encapsulation) ACMs, to minimise risk of exposure to asbestos fibre.

3. Scope of Policy and Exclusions

The scope of this Policy covers:

- 3.1. All premises built or refurbished before the year 2000 will be included within our 'duty to manage' (regulation 4 programme) and our general Health and Safety duties where we have the responsibility for ensuring safe properties for customer and colleagues. This includes:
 - 3.1.1. All non-domestic properties (which includes offices, depots, shops, other commercial buildings, remote plant, and garages). NOTE: The definition of 'nondomestic' also includes communal areas or common parts of our blocks, flats and multi-occupied buildings.
 - 3.1.2. All domestic properties (which includes General Needs Housing, Extra Care, Supported Housing, Sheltered Housing, and other rented properties owned and managed by GSA).
 - 3.1.3. All properties, where under a tenancy agreement or contract, GSA has responsibility for maintenance and repairs, including the control of access of maintenance workers into the building.
- 3.2. All premises will be presumed to contain asbestos containing materials (ACMs) until a survey has been completed and the presence or absence of asbestos confirmed.

3.3. **Works on Asbestos** includes:

- Work which removes, repairs or disturbs asbestos;
- Work which is ancillary to such work (ancillary work);
- Supervising the work referred to above (supervisory work).

4. Definitions

Asbestos	‘Asbestos’ is the general term used for the fibrous silicates. Three main types of asbestos were commonly used in construction in the past: □ crocidolite (commonly known as blue asbestos) □ amosite (commonly known as brown asbestos)
	□ chrysotile (commonly known as white asbestos) Any material containing one or more of these fibrous silicates at more than trace amounts falls within this definition.
Asbestos-Containing Material (ACM)	Any material containing fibrous silicates or mixtures of them. Descriptions of typical ACM are provided in L143: Managing and working with asbestos Control of Asbestos Regulations 2012 (Health and Safety Executive - 2013).
Asbestos Management Plan	A plan which is produced following a risk assessment which sets out how to manage the risk, including the implementation of a system of monitoring (see section 6.5).
Asbestos Register	We maintain an up-to-date Asbestos Register containing records of presence, location, condition, and type of asbestos-containing materials (ACMs) within all properties where we have a duty to manage asbestos
Management Survey	The purpose of a management survey is to identify, as far as reasonably practicable, the presence and extent of any suspect ACM in the building which could be damaged or disturbed during normal occupancy, including foreseeable maintenance and installation, and to assess their condition (definition as per the Asbestos: The survey guide (HSG264)). All areas, including underfloor coverings, above false ceilings, and inside risers, service ducts and lift shafts, should be accessed and inspected as far as is reasonably practicable. Surveying may involve some minor intrusive work, such as accessing behind fascia and panels and other surfaces or superficial materials.

Refurbishment and Demolition Survey	A refurbishment or 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 ACM 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 survey may also be required in other circumstances, e.g. when more intrusive maintenance and repair work will be carried out.
Non-licensed work	Work which is sporadic and of low intensity, where the concentration of asbestos fibres in the air is lower risk. Examples include drilling of textured coatings for installation of fixtures/fittings, removal of asbestos cement product in good condition or asbestos containing floor tiles where the fibres are firmly contained within the material. Carrying out this type of work requires approved training (e.g. Approved (Cat B) Non-Licensable Works with ACMs).
Notifiable non-licensed work (NNLW)	Work of greater risk due to the likely release of asbestos fibres into the air. Examples include large scale removal of textured coatings or removal of asbestos cement product which is in poor condition and the asbestos fibres are not firmly contained with the materials.
	NNLW requires training in accordance with Control of Asbestos Regulations 2012.
Licensable work	Refers to activities which involve significant hazard, risk or public concern, and must be performed by a licensed contractor. Examples include work and removal of asbestos insulating board or cleaning up significant quantities of loose/fine debris containing ACM dust. Licenses must be notified at least 14 days before work commences to the HSE.
Licensed Contractors	The HSE only allows licenced contractors to carry out licensed asbestos works. Licenced contractors must demonstrate that they have the necessary skills, competency, expertise, knowledge and experience of work with asbestos, and that they have appropriate health and safety management systems in place.

5. Roles and Responsibilities

5.1. The **Group Board** is responsible for ensuring that management of health and safety and asset compliance meets statutory and regulatory requirements and is sufficiently resourced. This includes GSA's approach to the management of asbestos.

5.2. The **Executive Board** is responsible for ensuring that appropriate arrangements and resources are put in place for ensuring asbestos safety which complies with legal and regulatory standards, delegating operational responsibility as appropriate.

5.3. The **Executive Director of Governance** is responsible for:

- Ensuring that appropriate mechanisms are in place for monitoring compliance with asbestos safety legislation, regulation and policies and procedures.
- Ensuring that GSA, as the duty-holder, discharges its legal duties through the commitments set out in this policy.
- Reporting any breach in standards to the GSA Board and to the relevant Regulator (as appropriate).

5.4. The **Director of Operations** is responsible for:

- Ensuring that appropriate resourcing and arrangements are in place to meet the regulatory, legislative and statutory requirements relating to asbestos safety.
- Formulating programmes of work consistent with the delivery of this Policy.
- Monitoring the performance of all work streams undertaken to ensure compliance with statutory requirements and this Policy.
- Ensuring contractors engaged to carry out inspections, and maintenance works are procured with contractors holding the required qualifications and competency.
- Monitoring the performance of contractors appointed to carry out inspections and maintenance works, including contract and performance management.

5.5. The **Head of Health & Safety** is responsible for:

- Reviewing reporting (second line assurance) on asbestos safety compliance to the Executive Board, the GSA Board and its Committees.
- Ensuring that GSA has appropriate procedures, processes and internal controls in place which comply with all legal, regulatory and policy requirements.
- Ensuring that appropriate mechanisms are in place for monitoring compliance with electrical safety legislation, regulation and policies and procedures.
- Reporting all material issues of non-compliance (whether potential or actual) to the Executive Board.

5.6. The **Head of Property Compliance** is responsible for:

- Acting as the competent person for asbestos management.
- Maintaining a master asset database of all properties (domestic and commercial) where we have a responsibility to carry out asbestos safety checks and maintenance.
- Managing the availability of correct stock data and landlord compliance data subsets against which work programmes and contracts are prepared.

- Overseeing data reconciliation exercises to ensure that all properties for which we have a responsibility are included on the servicing programme.
- Leading the development of the Asbestos Policy and associated policies and procedures.
- Ensure that the Asbestos Register is in place, and updated on a regular basis, at least once a year.
- Raising the profile of asbestos safety and management across GSA.
- Implementing an effective performance management framework and assurance activities that will strengthen risk control and provide the highest levels of assurance.
- Ensuring that processes are in place to check the competency of contractors at the point of procurement.
- Ensuring that GSA colleagues and contractors employed to deliver the commitments outlined in this policy have the skills, knowledge, qualifications, competence and experience necessary and monitoring their operational practices and performance.
- Ensuring that tender evaluations and contract specifications include consideration for the management of asbestos and advising on any technical requirements and specifications.
- Reporting all material issues of non-compliance (whether potential or actual) to the Head of Health and Safety.
- Implementing and maintaining Data Governance Protocols for asbestos safety data, including protocols for reconciling data against the Total Landlord Requirement (TLR).

5.7. The **Compliance Manager** is responsible for:

- Ensuring the operational delivery of this policy and compliance with the regulations and statutory requirements.
- Acting as the first point of contact for all asbestos safety related matters.
- Ensuring that works are delivered safely and in line with agreed schedules. ?
- Receiving audit feedback and acting upon findings.
- Communicating the presence of ACMs to contractors
- Reporting all material issues of non-compliance (whether potential or actual) to the Head of Health and Safety.
- Monitoring the quality and correct storage of all certification and documents required to demonstrate compliance with the management of asbestos in situ or removal, including the control of the GSA Asbestos Register.

5.8. The **Head of Data and Analytics** is responsible for:

- Ensuring that GSA has appropriate controls in place for ensuring the accuracy and integrity of data reported as part of the Performance Committee Pack.
- If appropriate controls can't be put in place this is flagged through the Kitemark assessment for the relevant performance measure.

5.9. **Managers** are responsible for:

- Ensuring the effective day to day management of health and safety (including asbestos safety) within their scope of responsibility.
- Escalating any asbestos safety concerns to the Compliance Manager or designated Asbestos Team member.
- Informing the Compliance Manager of a relevant change of use to a building which falls into their area of responsibility.
- Ensuring that any accidents, incidents, near misses and hazards are recorded, reported and investigated.
- Ensuring colleagues attend asbestos safety training, relevant to their role.
- Ensuring asbestos safety information is disseminated to GSA colleagues and customers as appropriate.
- Ensuring effective communication of any asbestos presence relevant to works being undertaken to all interested parties, including colleagues, contractors and customers.

5.10. The **Procurement, Facilities and Fleet Director** is responsible for:

- Ensuring that procurement processes (including those relating to health and safety and checking the competency of contractors) are followed by contract managers and the procurement team.

5.11. All **colleagues** are responsible for:

- Taking reasonable care of themselves and others around them.
- Reporting any hazards, defects, shortcomings or issues of non-compliance regarding asbestos to their line manager (escalating to the Asbestos Team where required).
- Completing any mandatory asbestos safety training relevant to their role within stipulated timeframes.
- Complying with all health and safety policies, procedures, associated instructions and working practices.

6. Policy

It is our duty to manage ACMs where we have the sole responsibility for the premises or common parts of multi-occupied buildings or where, under a tenancy agreement or contract, we have responsibility for maintenance and repairs and control access of maintenance workers into the building.

We will manage, so far as reasonably practicable, all ACMs falling under our control in order to minimise the risk of any person being exposed to asbestos fibres, in accordance with the legal, regulatory and statutory requirements.

We achieve this by:

Surveys

We will carry out surveys in:

- 6.1. Non-Domestic Properties – For non-domestic properties (which includes communal areas of residential premises), we carry out initial Management Surveys with an annual re-inspection as part of a planned programme. Where it is not reasonably practicable to access a property then we will presume that asbestos is present and proceed accordingly. These cases will be reflected in the monitoring report.
- 6.2. Domestic Properties – On all pre 2000 properties we will assume that asbestos is present before commencing works where a survey is not readily available and will undertake surveys prior to any intrusive works. We will carry out Management Surveys for domestic properties at void stage or prior to any intrusive planned or major repair works being undertaken. GSA are committed to complete a programme of management surveys for all non-domestic properties within scope of this Policy.
- 6.3. Refurbishment and Demolition - We will carry out a Refurbishment or Demolition Survey prior to any intrusive refurbishment or demolition works carried out in premises covered by the scope of this Policy.
- 6.4. More information is included in our Asbestos Surveying and Bulk Sampling Procedure.

Risk Assessment

- 6.5. Where ACMs are found to be present, we will:
 - record the location, quantity, type, and condition of the ACM, implementing appropriate control measures to reduce the risk of exposure to asbestos fibres.
 - The following general principles will be applied:
 - Where ACM is assessed as being in good condition then this will generally be left in situ and managed.
 - Where ACM is assessed as posing a risk to health it will be, so far as is reasonably practicable, removed or encapsulated.
 - Where removal or encapsulation is not reasonably practicable then access to the ACM will be managed to reduce the risk of exposure as far as possible.
 - assess the risk of ACM exposure, taking into account the likelihood, and the likely number of people that might be exposed, in the event of an uncontrolled release of asbestos fibres.
 - prepare a plan on how to manage the risk, implementing a system of monitoring determined by the risk assessment;

- ensure that any plan related to ACMs is put into action, monitored and kept it up to date.
- provide information to anyone likely to work on or disturb ACMs.

Managing Works

6.6. We ensure that we plan, manage, deliver and monitor all work that could result in the release of ACMs and ensure suitable and sufficient documentation is available for nonlicensed, notifiable non-licensed work (NNLW) and licensed work. This includes implementing emergency procedures in the event of an unplanned and/or uncontrolled release of asbestos fibres to lower the risk of exposure, as far as is reasonably practicable and as quickly as possible.

6.7. More information is set out in the Asbestos Removal and Works Procedure.

Competency

6.8. All contractors appointed by GSA will be assessed as being appropriately competent to undertake the work for which they are being considered at the point of procurement.

6.9. Contractor competencies and training should be reviewed annually by the relevant contract manager with support from the Asbestos Team.

6.10. Licensed contractors will be required to have an annual programme of asbestos training. This will be evidenced as part of the application to the list of approved contractors and is reflected in procurement processes.

6.11. All non-licensed work involving ACMs will be carried out with the appropriate work plans including risk assessments and method statements in place.

6.12. Contractors appointed to undertake licenced works must hold a licence issued by the Health and Safety Executive and be members of an appropriate Trade Association such as the Asbestos Removal Contractors Association (ARCA) or the Thermal Insulation Contractors Association (TICA) (where appropriate).

6.13. Any asbestos management surveys required under the Control of Asbestos Regulations (CAR) 2012 and pre-works refurbishment or demolition surveys carried out by others will be undertaken by UKAS Accredited Contractors to ISO/IEC:17020 and have a minimum of 2 years' experience.

- 6.14. Persons appointed to measure the concentration of asbestos fibres and those completing a four stage clearance will be ISO:17025 accredited. All ACM samples will be tested by a UKAS Accredited Laboratory.
- 6.15. The competency of internal colleagues is covered under the Training Section, below.

Reporting Incidents

- 6.16. Accidents and incidents involving asbestos will be reported in line with the Accident and Incident Reporting Policy. They are included in the quarterly Health and Safety reports that are presented to the Group Board. Any RIDDOR incidents are included in the Health and Safety Committee Performance Report.
- 6.17. We will review any asbestos incidents and near misses to identify any learning points and will update our policies and procedures as required.

7. Monitoring and Reporting

- 7.1. We maintain an up-to-date Asbestos Register of all properties where we have a duty to manage asbestos.

7.2. In the Asbestos Register, GSA will maintain up to date electronic records of the type, location and condition of the ACMs with supporting documents (asbestos survey, removal certification etc). The register will hold detailed information on re-inspection frequencies and all remedial works required..

7.3. Key Performance Indicators will be produced to provide assurance on adherence to this Policy and the requirements of legislation. This information will be reported in GSA's Performance Scorecard and will cover:

- Pre-2000 non-domestic buildings with an asbestos management survey (%)
- Pre-2000 non-domestic buildings with a reinspection survey completed within the anniversary date (%)
- Pre-2000 domestic buildings with an asbestos management survey (%)

8. Assurance

- Internal Quality Assurance (QA) Process – The Asbestos Team will complete a programme of inspections on asbestos removal and survey works which will be held on the health and safety electronic management system.
- Internal Audit - This service area will be periodically included on the Internal Audit Programme which will review the effectiveness of controls surrounding asbestos safety activity. Currently Asbestos Safety is audited every three years, but this may be flexed depending on the level of risk.

9. Equality Impact Assessment

We take account of known individual or collective needs identified in risk assessments when planning our asbestos safety arrangements. Where needs are identified, we put in place bespoke arrangements as required.

10. Training and Competency

- We have a duty to ensure that colleagues and contractors are appropriately skilled, qualified and competent to undertake activities around asbestos safety.
- All colleagues will have asbestos related training appropriate to the specific needs of their place of work and their role, which is monitored via the GSA Legal and Regulatory Training matrix.
- Training requirements for relevant roles will be reviewed by the Head of Health and Safety, the relevant operational Head of Service and the Learning and Development Lead to ensure that these meet legal requirements and best practice.

11. Communication and Implementation

- Information relating to asbestos safety is provided to customers via our website and on sign-up.
- Communications with customers will explain how customers can report any concerns about potentially damaged ACMs, and the Customer Contact Centre will have clear guidance on where to direct any such concerns.
- Communications with customers when asking them to allow access for surveys, inspections and remedial works will highlight the importance of asbestos safety in the home and carrying out appropriate checks.
- We provide information to colleagues and contractors on the importance of asbestos safety issues and make them aware of signs that may indicate a concern relating to asbestos safety.
- Information will be available in different formats as requested, tailored to individual requirements.
- The Asbestos Procedures set out the details of how this policy will be implemented and will be reviewed at defined timescales in line with the Policy.

12. Legal and Regulatory Framework

The legislation and guidance of specific relevance to asbestos is:

- **Health & Safety at Work Act 1974:** The primary piece of legislation covering occupational health and safety in Great Britain
- **Control of Asbestos Regulations (CAR) 2012:** The legislation sets out the legal duties on managing asbestos.
- **Management of Health & Safety at Work Regulations (1999):** The legislation which sets out duties to assess and manage risks to their employees and others, to help prevent work accidents and work-related illness.
- **Workplace (Health, Safety & Welfare) Regulations 1992:** The legislation sets out duties covering a wide range of basic health, safety and welfare issues and apply to most workplaces (except construction sites and some mineral extraction sites).
- **Hazardous Waste Regulations 2005:** The legislation addresses the proper handling and disposal of hazardous waste.
- **Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (2013):** The legislation sets out duties on reporting of dangerous occurrences e.g. substantial release of hazardous substances.
- **Construction Design and Management Regulations 2015:** The legislation sets out duties for managing the health, safety and welfare of construction projects. CDM

applies to all building and construction work and includes new build, demolition, refurbishment, extensions, conversions, repairs and maintenance.

- **ACoP L143 - Managing and Working with Asbestos:** Guidance for employers about work which disturbs, or is likely to disturb, asbestos, asbestos sampling and laboratory analysis.
- **HSG264 (Asbestos -The Survey Guide):** Guidance aimed at people carrying out asbestos surveys and people with specific responsibilities for managing asbestos in non-domestic premises under the Control of Asbestos Regulations 201, covering competence and quality assurance and surveys, including: survey planning, carrying out surveys, the survey report and the duty holder's use of the survey information.
- **HSG247 – Asbestos: The licensed contractor guide:** Guidance for businesses holding a licence to work with (either repair or removal of) asbestos-containing materials (ACMs), those supervising such operations and those with an ancillary licence or providing training on asbestos.
- **HSG248 – Asbestos: The analysts guide:** Guidance for analysts involved in asbestos work.
- **HSG210 – Asbestos essentials task manual:** Asbestos essentials uses a series of task sheets, with over 100 full colour photos and illustrations, to describe 'good practice' for non-licensed tasks and covers the action needed to reduce exposure to an adequate level. It is aimed at all workers who may come into contact with asbestos, including electricians, builders, plumbers, carpenters etc.
- **HSG227 – Comprehensive guide to managing asbestos in premises:** Guidance for those with a duty to manage the risks from asbestos-containing materials (ACMs) in premises, e.g. building owners, tenants and anyone with legal responsibilities for workplaces. Expands on advice in the free leaflet 'Managing asbestos in premises' and is useful in complex organisations.
- **The Housing Health and Safety Rating System (HHSRS):** to help local authorities identify and protect against potential risks and hazards to health and safety from any deficiencies identified in dwellings.

12.1.The Head of Health and Safety will proactively monitor any forthcoming changes to legislative and regulatory requirements and ensure GSA effectively prepares to meet new requirements. In the event of any changes, our Asbestos Procedures will be updated accordingly, and any changes will be disseminated to relevant colleagues across GSA, and to our contractors, consultants, and customers as appropriate.

12.2.The Compliance Manager will regularly share knowledge and good practice across relevant teams within GSA. This includes dissemination of information from statutory

regulators, institutions, media articles, information shared by asbestos contractors, professional bodies, and other sources.

13. Information Sharing and Confidentiality

We will provide information as required in line with relevant law and regulation.

We collect information (personal data) to enable us to:

- manage and support our relationship with customers to comply with legal obligations □
improve our services
- achieve our legitimate business aims

We are committed to complying with data protection legislation when handling data.

Customers have rights including access to their data and to object to the way it is processed. For more information on how and why we process customer data and how customers can exercise their rights please view our full Privacy Policy on our website at [Privacy notice – GreenSquareAccord](#).