Cornwall Rural Housing Association

Asbestos Management Policy

1.0 Introduction and Aim

1.1 Cornwall Rural Housing Association Limited (CRHA) owns and manages 387 tenanted homes. The majority of its homes' profile is general needs houses and bungalows, however, there is a small proportion of flats, but they do not have any communal or common areas.

1.2 The Asbestos Management Policy explains how CRHA's commitments to Asbestos Safety will be met and describes how CRHA fully complies with the Control of Asbestos Regulations (CAR) 2012). In addition to the policy CRHA has an Asbestos Management Plan that documents the controls in managing asbestos safely and an Asbestos Register which holds records of the assets with Asbestos Containing Material (ACMs).

1.3 Under this piece of legislation CRHA becomes a duty holder for its premises. CRHA retains ownership of the Asbestos Register and has overall responsibility for the accuracy of the data held against each premise.

1.4 CRHA's housing stock constructed prior to the year 2000 could contain asbestos containing materials (ACM's). Prevalence of these materials is low. Most occurrences are for asbestos cement under cloaks to the verge details of our housing externally. CRHA will take steps to provide information to those customers where ACMs are known (or presumed) to be present in their home at the time of resurveying the property or when a refurbishment and/or demolition project is to take place e.g. kitchen and bathroom replacements. General information around asbestos will be publicised on our website.

1.5 The Control of Asbestos Regulations (CAR) imposes a statutory duty to manage asbestos in non-domestic premises. CAR arises from the parent enabling act, The Health and Safety at Work Act 1974, and is therefore confined to non-domestic premises, i.e., workplaces. CAR does not directly apply to domestic property but does apply to any work activity that takes place within it, for example, routine repairs and maintenance. CRHA considers all housing in our portfolio to be potential workplaces for contractors and customers especially those who receive landlord consent to carry out home improvements, hence the duty to manage is accepted in line with the provisions of CAR.

1.6 The aim of this policy is to ensure that the CRHA, its employees, contractors, customers and stakeholders are aware of the presence and location of any asbestos containing materials (ACM's) within their respective working areas, together with the action being taken or required to ensure that they are not exposed to airborne fibres from ACM's.

1.7 ACM's can only pose a risk to health if they are disturbed, and the asbestos fibres become airborne and inhaled. Therefore, if ACM's are maintained in good

condition, there is not a need to remove the materials. If ACM's are in good condition they may be left in place and managed as the optimum solution.

2.0 Legislation and Official Guidance

- The Health and Safety at Work Etc Act 1974
- Workplace (Health, Safety and Welfare) Regulations 1992
- The Management of Health & Safety at Work Regulations 1999
- The Control of Asbestos Regulations 2012
- The Construction (Design & Management) Regulations 2015
- HSG 264 Asbestos: The Survey Guide
- Approved Code of Practice L143 Work with Materials Containing Asbestos
- The Occupiers' Liability Acts 1984

3.0 Policy Principles

3.1 Exposure to asbestos fibres can potentially cause serious and irreversible disease. Maintenance and improvement activities consequentially may involve removal or disturbance to ACM's. It is the policy of CRHA to prevent the exposure to asbestos fibres to its contractors, customers, employees and any other persons.

3.2 It is the responsibility of staff and other responsible parties to be familiar and to comply with the procedures contained within the Asbestos Management Plan.

3.3 It is the responsibility of the Head of Homes & Customers and the Board of management to ensure the Asbestos Policy and the Asbestos Management Plan are implemented, maintained and reviewed.

3.4 The Management Plan is the foundation of Cornwall Rural Housing Association's approach to maintaining safety and compliance with relevant legislation.

4.0 Policy

4.1 CRHA will remove, maintain (leave undisturbed) or encapsulate asbestos as appropriate to its location or condition.

4.2 The overall objective of this policy is to ensure that all ACM's are identified and managed in a safe and proportional manner. Any identified ACM's that are damaged will be monitored or sealed and repaired or removed.

4.3 CRHA will maintain an Asbestos Register.

4.4 Information attained about ACM's identified from asbestos surveys will be incorporated into the Asbestos Register.

4.5 Asbestos information on the housing stock will be freely provided to contractors, customers and other stakeholders.

4.6 CRHA will implement an effective management plan ensuring that appropriate measures such as monitoring, encapsulation, sealing, inspection, or removal are undertaken as required.

4.7 To ensure accurate identification and location of ACM's, CRHA will employ suitably qualified and competent Asbestos surveyors.

4.8 CRHA have conducted management surveys on all their stock (constructed prior to 2000) and since the initial surveys continue to resurvey their homes by delivering a 4 yearly rolling programme updating data as necessary.

4.9 Key performance and management information will be provided to CRHA's board of management through a dashboard of compliance. Highlighting the number of resurveys undertaken and the survey results giving the board of management assurance that CRHA are managing asbestos in their stock.

5.0 Asbestos Management Plan

5.1 The Asbestos Management Plan should be read in conjunction with the Asbestos Policy. The plan details the measures that are in place to identify, manage and/or mitigate risks associated with asbestos. The Asbestos Management Plan is relevant for maintaining a safe environment for all customers, employees, contractors, and others. It is designed to be a 'live document' that is to be regularly reviewed, amended and updated as changes happen within the organisation and its operating processes. The Asbestos Policy and Asbestos Management Plan will assist CRHA in ensuring compliance with asbestos in accordance with the Control of Asbestos Regulations (CAR) 2012.

5.2 CRHA have undertaken Asbestos Management surveys to 150 pre 2000 properties of which 53 have no asbestos containing material with 97 properties having ACM's or presumed ACM's. All identified properties with ACM's or presumed ACM's have been deemed low level risk following assessment.

6.0 Asbestos Register

6.1 The Asbestos Register is a data base that details data drawn from Asbestos Management Surveys. The data includes:

- Location of ACM
- Type of ACM
- Quantity of ACM
- Presence of surface coating
- Type of asbestos
- Approach e.g. tested or presumed

6.2 The Asbestos register records the results of Asbestos Management Surveys. All Asbestos surveys and Refurbishment & Demolition (R & D) surveys carried out on behalf of CRHA are recorded on the data base.

6.3 Reinspection dates for positive entries to the Asbestos register are available in a report format. CRHA asbestos records show data pertaining to its homes as low risk level for both internal and external areas. Reinspection's will be undertaken on a risk-based approach and on a rolling programme every 4 years.

6.4 The data base is made available to all contractors that work for CRHA on our homes. All contractors are issued with information relating to the Asbestos Register and provided with unique log in details to access the Asbestos Register prior to conducting any work on CRHA's behalf.

6.5 It is the responsibility of the Property Services Manager to ensure that the Asbestos Register is updated in a timely manner.

6.6 The data base is held on a web portal held by Allium Environmental ltd. Alpha Tracker (allium.uk.net).

6.7 CRHA will offer asbestos awareness training to all staff and contractors periodically.

7.0 Refurbishment Work

7.1 CRHA will carry out a R & D survey prior to any refurbishment or demolition work. If the refurbishment works are restricted to small areas e.g. kitchen or bathroom replacement, then a localised survey of the areas likely to be affected may be completed and not the entire building.

8.0 Asbestos Remedial Work

8.1 CRHA will ensure where asbestos is positively identified, removal, sealing or encapsulation is recommended, this will be conducted for:

8.2 Non-licensed works – as defined in regulation 2 of the CAR 2012 – by specifically trained contractors with appropriate equipment and working procedures in place which are sufficient to comply with the CAR 2012.

8.3 Notifiable non-licensed works – as defined in regulation 2 of the CAR 2012 – by a licensed asbestos removal contractor (LARC) licensed by the Health & Safety Executive in compliance with the CAR 2012.

8.4 Licensed works - as defined in regulation 2 of the CAR 2012 – by a licensed asbestos removal contractor (LARC), licensed by the Health & Safety Executive in compliance with the CAR 2012.

8.5 Where an ACM has been removed in whole or in part, it will be replaced with a material that has no asbestos content and fulfils the equivalent function of the original asbestos material, e.g. for fire protection.

Procedure

It is the responsibility of staff and contractors to report any suspected ACM material to CRHA. Previously unidentified materials maybe discovered. The Property Services

Manager will ensure that the suspect material is inspected, and an assessment of the material undertaken.

Suspect material should not be disturbed until it has been inspected by a competent person and in accordance with the above.

Where reactive/responsive repairs are undertaken and depending on the type of work involved (disturbance of artex coating, floor tiles) the Property Services team will check data held for the property against the Asbestos Register and notify the contractor of the potential risk and organise a survey beforehand.

Where refurbishment or major works is planned a R & D survey of the property will be undertaken before the project starts. The R & D survey will be made available to the principal contractor and disseminated to others in printed or electronic format.

New contractors to CRHA are to be advised how to access the Asbestos Register.

CRHA will provide an executive summary to all customers when an Asbestos survey is conducted and make them aware of the location of any ACMs within their home.

If a property is to be disposed of, the Association will provide all known ACM information to the new owner and amend the Association's records accordingly.

Date Reviewed	**Changes to the policy**	**Date to be Reviewed**	**Approved By**	**Author**
June 26	The policy has been reviewed with the following changes: New CRHA logo added. Where required 'tenant' changed to 'customer' and 'property' changed to 'home' – this is to achieve consistent language. 1.1 – updated to reflect current number of homes All typo's corrected 6.4 – added risk-based approach	June 29	The Board	SA