



Asbestos Management Policy

Policy Manual Section:	Property Services
Policy Number:	OPM3
Scottish Social Housing Charter Reference:	1. Equalities 2. Participation 3. Communication 4.Quality of Housing 5.Repairs Maintenance and improvements
Date Approved by Management Committee:	January 2023
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Govan Housing Association can provide this document on request, in different languages and formats, including Braille and audio formats.

1. Purpose of the Policy

1.1 The purpose of this policy

It is the policy of Govan Housing Association to effectively manage all asbestos containing materials (ACM's) located within its non-domestic properties and communal areas, and to reduce the ACM's related risks to as low as reasonably practicable. This duty also includes how we share data relating to ACM's with our staff, tenants, contractors and others who may be affected by ACM's being disturbed.

This policy will set out how Govan Housing Association will ensure that ACM's are maintained effectively in line with the current legislations.

2. Legislative and Regulatory Compliance

2.1 This policy will set out Govan Housing Associations responsibilities to comply with the relevant legislation and regulatory guidance. This covers the duty to manage ACM's in non-domestic properties and common areas. Examples of this legislation is as follows;

- Control of Asbestos Regulations (CAR) 2012
- Health and Safety at Work Act 1974
- Control of Asbestos at Work Regulations 1999
- Construction Design and Management Regulations 2015
- Housing (Scotland) Act 2010/2014
- Reporting of Injuries, Diseases or Dangerous Occurrences (RIDDOR) 2013
- Asbestos: The survey guide HSG264/HSG248

2.2 The Social Housing Charter came into effect in April 2012 and this sets the standards and outcomes that all social landlords should aim to achieve when performing their housing activities. The Charter replaces the Performance Standards and the outcomes relevant to this Policy are:

- Equalities

Social Landlords perform all aspects of their housing services so that every tenant and other customer has their individual needs recognised, is treated fairly and with respect, and receives fair access to housing and housing services.

- Communication

Social landlords manage their businesses so that tenants and other customers find it easy to communicate with their landlord and get the information they need about their landlord, how and why it makes decisions and the services it provides.

- Participation

Social landlords manage their businesses so that tenants and other customers find it easy to participate in and influence their landlord's decisions at a level they feel comfortable with.

- Quality of Housing

Social landlords manage their businesses so that tenants' homes, as a minimum, meet the Scottish Housing Quality Standard (SHQS) by April 2015 and continue to meet it thereafter, and when they are allocated, are always clean, tidy and in a good state of repair.

- Repairs, maintenance and improvements

Social landlords manage their businesses so that tenants' homes are well maintained, with repairs and improvements carried out when required, and tenants are given reasonable choices about when work is done.

2.3 Social landlords are responsible for meeting the standards and outcomes set out in the Charter. The Scottish Housing Regulator is responsible for monitoring, assessing and reporting on how well social landlords, individually and collectively, achieve the outcomes.

3. Policy Aims

3.1 The main aim is to ensure implementation of the Control of Asbestos Regulations (CAR) 2012 to ensure that the health, safety and wellbeing of all people in non-domestic properties and communal areas maintained by Govan Housing Association which may have ACM's within the property. This includes the fabric of any common areas of multi-tenure buildings managed by Govan Housing Association, as well as shops and all offices the Association owns. We aim to protect the occupants and visitors to our properties including staff and contractors as far as is reasonably practicable.

3.2 There is an Asbestos Management Plan which accompanies this policy and sets out how we intend to manage the ACM's in our non-domestic and communal areas and will be reviewed annually

4. Asbestos Policy

4.1 Asbestos is the single greatest cause of work-related deaths in the UK. Govan Housing Association is committed to achieving the highest possible standards in safety, services, accommodation and customer care that we can provide to our customers.

4.2 Regulations controlling asbestos materials have evolved from regulations concerning the manufacturing and processing of asbestos into regulations related to the control of the material.

4.3 Under current regulations Govan Housing Association is required to have a robust Asbestos Policy and Management Plan to ensure everyone who either works for or on behalf of the Association, or who may use any facility provided by the Association, is not exposed to asbestos materials in a condition which may expose them to asbestos fibres.

4.4 Govan Housing Association is committed to ensuring we conduct our business in a way that protects the health, safety and welfare of its employees, tenants, other residents, contractors and visitors.

Govan Housing Associations is aware of our responsibilities in relation to the control and prevention of exposure to ACM's, therefore we will;

- Ensure all ACM's are managed efficiently and associated risks are reduced as low as reasonably practicable
- Always presume materials contain asbestos, unless there is strong evidence that they do not. Such as an asbestos survey certificate carried out by a qualified contractor.
- Creating and maintaining up to date records of the location and condition of asbestos containing materials (ACMs) or presumed ACMs in its premises.
- Continually assessing the risk from the material.
- Promote awareness of the hazards associated with ACMs, the contents of this Asbestos Policy and the associated Asbestos Management Plan.

- Keeping a plan that sets out in detail how the Association is going to manage the risk from this material.
- Review this Asbestos Policy and Asbestos Management Plan annually or if legislation or circumstances change.
- Provide a copy of our asbestos register to any contractor who will be carrying out work within our premises.
- Have an alert and notification process within our work orders notifying contractors of any ACMs present in the selected property.
- Implement an effective management plan and ensure all persons who are required to disturb, repair or remove asbestos are competent and/or licensed.

5. The Duty Holder

5.1 The duty holder for Govan Housing Association is the Property Services Manager.

It is the duty holder's responsibility to ensure the fulfilment of the policy and procedures on a practical day to day level.

5.2 The Property Service Assistant or Officer will be the asbestos co-ordinator, responsible for maintaining the Asbestos Register and for co-ordinating asbestos surveys and sampling as well as asbestos removal/remediation works. This role will also include liaison with 'non-asbestos' works contractors, ensuring that all appropriate asbestos information is provided and/or obtained and properly interpreted where works are liable to disturb the fabric of buildings.

6. Asbestos survey

6.1 Where Association premises and common areas of housing stock were built or renovated prior to 2000, an Asbestos Management Survey programme will be carried out by a competent UKAS accredited asbestos management consultancy. (HSE expects that no asbestos containing materials would be in use from 2000.) The survey should detail the location and assess the condition of any ACMs within the premises. The survey should also be provided via electronic PDF format.

6.2 Govan Housing Association currently holds 76% of asbestos reports for our stock.

6.3 Prior to any refurbishment, demolition or major repair works on building fabric, which is not known to be asbestos free, a competent UKAS accredited asbestos management consultancy will be commissioned to carry out a 'Refurbishment (i.e. intrusive) asbestos survey of the area to be worked upon.

7. Asbestos Register

7.1 Govan HA holds an electronic asbestos register within its Maintenance drive and also within the housing software; currently Home Master. This is available to all contractors and in house subsidiary (Govan Home Team) to allow them to carry out any repairs or refurbishments safely.

8. Damaged or Disturbed/ suspected ACM's

8.1 It is the responsibility of all staff to report to the Asbestos Co-ordinator if they suspect that disturbed or damaged ACM's may be present in a building owned or occupied by the Association. In a case where a material is suspected of containing asbestos, and where this material may reasonably become disturbed, this would also apply.

In such cases, an external consultant having UKAS (United Kingdom Accreditation Service) accreditation for asbestos sampling and analysis, will be contacted to carry out identification.

Where damage to any material known to contain asbestos has taken place, and is likely to give rise to airborne fibre release, the Asbestos Coordinator will arrange for isolation of the area pending an investigation. They will arrange for air monitoring tests (measurement of airborne fibre concentrations) to be carried out and sampling and analysis will be carried out by an independent UKAS accredited organisation to determine the level of any potential contamination, or to provide reassurance that unacceptable contamination has not occurred.

Remedial action will be required when airborne fibre levels exceed 0.01 f/cc. The nature of the remedial work must be agreed with the Property Services Manager or Technical Project Manager

When remedial action becomes necessary after exposure, the relevant facts may have to be reported to the HSE in accordance with the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR). (Advice may be sought from a competent Asbestos Consultant to determine whether the incident is in fact RIDDOR reportable.)

9. Void Property Assessments

9.1 An asbestos survey will be carried out at each void property if there has not been one already completed. This information will then be added to the Asbestos Register, updated in the current housing software used by the Housing Association.

10. Tenant Refurbishments

10.1 Prior to a tenant carrying out an improvement within a property owned by Govan Housing Association, tenants will be required to seek advance permission before beginning works.

10.2 Before granting permission, the asbestos register will be consulted where required. If ACM's are identified within the proposed work area the Property Services Officer will liaise with the tenant.

10.3 Where the asbestos data is not held, the Property Services Officer will review the request and decide whether to refuse permission or to arrange for a survey to be carried out.

10.4 In the event the tenant's work is likely to disturb ACM's, the Property Services Officer and Property Services Manager will make a decision on the next course of action, ensuring all asbestos works are held to the policy and management plan and appropriate legislative guidance.

10.5 Permission may not be granted where the disturbance of ACM's is found, due to the cost and risk of exposure. This will however be reviewed along with the proposal form.

11 Action Plan

11.1 Govan Housing Association manages any ACM's by identifying the location and type of asbestos and instructing removal by a licensed asbestos removal contractor if required, as soon as practicable.

11.2 The Association will monitor and manage ACM's in situ and remove any ACM's found within its properties that have been disturbed or are going to be disturbed due to maintenance work.

11.3 The Association holds 89% of asbestos surveys on common areas. 1 of which have identified ACMs. The area is Chrysotile and will be monitored and managed.

1. Name and address of common areas	
2. Responsible Persons	
Name, designation and signature of Person with overall responsibility for asbestos control within the organisation.	Property Services Manager / Technical Project Manager
Name and designation of the person who produced this premises asbestos management plan.	Technical Project Manager
Name and designation of the person responsible for ensuring that this premises asbestos management plan is properly implemented and maintained. Also that it is reviewed and updated as often as necessary.	Property Services Manager / Technical Project Manager
Date this asbestos management plan was first produced.	January 2010
Date of last review.	January 2023

<p>Information about asbestos in these common areas is recorded and held here.</p>	<p>The association holds an electronic record of common areas within its domestic housing stock. This information is located within our Asbestos Register at : M:\HEALTH & SAFETY\Asbestos\ASBESTOS 2017 UPDATED\Asbestos Register\ASBESTOS REGISTER - working spreadsheet - HD.xlsx</p> <p>Pdf files of the surveys are located in: M:\HEALTH & SAFETY\Asbestos\ASBESTOS 2017 UPDATED\Surveys</p>
	<p>All Govan Home Team operatives have been trained in asbestos awareness and informed of the locations where ACM's are present. Any work orders issued highlight the locations of the ACM's and the procedure in the event of a disturbance of the ACM's.</p> <p>External contractors have been given access to our Asbestos Register and any works orders issued to the contractor will highlight and warn of any ACMs detected.</p> <p>Computer generated work orders highlight the locations of the ACM's automatically and warn operatives of exact location of ACM's. At this time the Association only has one property which contains ACM's in the common area, both locations have been assessed as a very low risk.</p>
	<p>Property Services Assistant, has been trained on Asbestos awareness and will renew this regularly or in line with guidance to refresh the course.</p>

12. ACM's within dwellings

- 12.1 The Association will identify any suspected ACM's at void phase of inspection to flats / houses and prior to any planned maintenance refurbishment works. In the unlikely event of ACM's being identified, it will be removed if it has been disturbed or is due to be disturbed due to refurbishment works. If not, then as advised it will be labelled,

monitored and managed. If any tenant has any concerns regarding ACM's within their dwelling the Association will inspect and if appropriate will get the suspected ACM tested by an approved asbestos surveyor.

13. Equal Opportunities

13.1 We are committed to ensuring equal opportunities and fair treatment for all people in its work. In implementing this Policy, we will provide a fair and equal service to all people, irrespective of factors such as gender, race, disability, age, sexual orientation, language or social origin, or other personal attributes.

14. General Data protection Regulations (GDPR) and Freedom of Information (FOI)

14.1 Govan Housing Association is fully committed to compliance with the requirements of the General Data Protection Regulations (EU) 2016/679 (GDPR), which came into force on 25 May 2018. The Association will therefore follow procedures that aims to ensure that all employees, Committee members, contractors, agents, consultants, partners or other persons involved in the work of the Association and who have access to any personal data held by or on behalf of the Association, are fully aware of and abide by their duties and responsibilities under GDPR.

14.2 Govan Housing Association is classed as a Scottish Public Authority under the Freedom of Information (Scotland) Act 2002 (FOISA). This act places a duty on Scottish Public Authorities to allow the public access to information they hold. This Policy has been written to ensure openness and transparency in line with this legislation and will be published on our website and available in other formats upon request. Information in relation to records held can also be made available upon request where the request meets the criteria set out in the legislation. Any such request should be made in line with our Freedom of Information and Environmental Policy.

15. Policy Review

15.1 The Policy will be reviewed every 3 years or as required due to any changes in legislation.

Equality Impact Assessment

TITLE OF POLICY	Asbestos Management Policy
Outcome	Ensure compliance with relevant legislation and good practice. Ensure H&S requirements are adhered to at all times.
What is the purpose of the proposed policy?	<ul style="list-style-type: none"> • Clarify what is meant by Asbestos Management. • Provide guidance. • State the governing body's approach and expectations in relation to Asbestos Management. • Adhere to legal obligations of the Group as set out under Health and Safety Legislation, in terms of asbestos management.
Protected Characteristic Groups Affected By the Policy	<p>Age The terms of this policy relates to all employees, irrespective of age. There are not aspects of this policy which impact about this protected characteristic.</p> <p>Disability The Policy is applicable to all employees irrespective of any disability that may exist.</p> <p>Marriage and Civil Partnership The terms of this policy relates to all employees, irrespective of marital status.</p> <p>Pregnancy and Maternity This policy relates to all employees, including pregnant employees.</p> <p>Race Similar to earlier points above, the policy does not relate specifically to this protected group, however, it is applicable to all employees irrespective of the person's race.</p> <p>Religion or Belief The policy does not consider religion or beliefs of individuals but clearly states it relates to all employees.</p> <p>Gender and Gender Reassignment All employees are required to comply with this policy including males, females, transgender people and those seeking or have experienced gender reassignment.</p> <p>Sexual Orientation This policy relates to all employees who will be treated equally and consistently.</p>
Who is the Target Audience of this policy or who is intended to benefit from the proposed policy and how?	All the Group's employees. Contractors. Tenants / residents. Members of the public.

(i.e. employees, service users, Management Committee etc.)	
Has any consultation, involvement been undertaken with the protected characteristic groups to inform this assessment? (please provide details who and how consulted)	No. The information relating to staff/tenants/residents is confidential and does not identify what characteristic relates to what individual. In consequence, it was not possible to consult the specific protected characteristic groups. All staff have been made aware of the policy which emphasises that all groups will be treated equally and consistently.
How have you, or will you, put the policy into practice, and who is or will be responsible for delivering it?	The policy has been approved by the Association's governing and is included in the corporate Policy Manual. The Director of Customer Services is responsible for the review of the policy and departmental managers will be responsible for delivery of the policy on a day to day basis.
How does the policy fit into our wider or related policy initiatives?	<p>This Policy ties in with the following policies:</p> <ul style="list-style-type: none"> • Gas Servicing • Legionella • Fire Safety • Lift Safety • Electrical Safety • Other repair and maintenance policies. <p>It also Relates to:</p> <ul style="list-style-type: none"> • Control of Asbestos Regulations (CAR) 2012 • Health and Safety at Work Act 1974 • Control of Asbestos at Work Regulations 1999 • Construction Design and Management Regulations 2015 • Housing (Scotland) Act 2010/2014 • Reporting of Injuries, Diseases or Dangerous Occurrences (RIDDOR) 2013 • Asbestos: The survey guide HSG264/HSG248
Do you have a set budget for this work?	The costs of managing asbestos management will be incorporated within departmental budgets which are set by senior staff and approved by the governing body each year.