



Northwards Housing

Asbestos Management Plan

September 2008

Performance standard for the management of asbestos containing materials within properties owned or managed by Northwards Housing.

In accordance with the requirements of:

- The Health and Safety at Work etc. Act 1974
- The Management of Health and Safety at Work Regulations 1999 (as amended) and
- The Control of Asbestos Regulations 2006

N.B. This plan will be reviewed periodically to respond to changes in legislation or revised working practices.

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1.0 Purpose

1.1 Introduction

The Health and Safety at Work etc Act 1974 places a duty on employers to take all reasonable steps to ensure that employees and non-employees are not exposed to risks to their health and safety. The risks could arise from the condition of premises or equipment or the way in which the employer undertakes their work.

Of particular concern in this document is managing the risk that may arise from the presence of asbestos containing materials in non-domestic premises (which includes the common parts of housing developments and blocks of flats).

Northwards recognises that it has a duty under Regulation 4 of the Control of Asbestos Regulations 2006 (CAR) to locate, assess, record, manage and monitor the asbestos containing materials in those premises for which it has the maintenance and repairing responsibility. Additionally, Northwards recognises that it has a duty to provide information on the location and condition of asbestos in its premises to others undertaking works on its behalf.

If asbestos containing materials are not disturbed, they are unlikely to release airborne fibres and therefore will not pose a risk to health. However, breathing airborne asbestos fibres could lead to asbestos related lung diseases,

principally cancers. Those most at risk are building and maintenance technicians and operatives who may be unaware that they are disturbing an asbestos containing material. CAR 2006 - Regulation 4 aims to reduce this risk by requiring the tracing of these materials and requiring information to be passed to those who may disturb them.

1.2 Aim of this Asbestos Management Plan

The aim is to ensure that Northwards has effective arrangements for managing asbestos in non-domestic premises.

To meet this aim, Northwards will –

- Assign specific responsibility for managing asbestos risks in all non-domestic Northwards premises for which Northwards has a duty to manage the asbestos.
- Establish procedures for managing asbestos in all such premises.
- Extend the above responsibilities and procedures to include domestic properties, thus discharging the general duty of care arising from The Health and Safety at Work etc. Act 1974 and the Management of Health and Safety at Work Regulations 1999 (as amended)

2.0 Background to Asbestos

Asbestos is the generic name given to a group of naturally occurring fibrous minerals. The term is generally used in the United Kingdom to refer to three specific minerals. These are **crocidolite**, commonly referred to as 'blue asbestos', **amosite**, commonly referred to as 'brown asbestos' and **chrysotile**, commonly referred to as 'white asbestos'.

Asbestos is a unique mineral. In its natural form the material is fibrous and has a high tensile strength this has meant that the material can be woven into a variety of products. The material can withstand chemical attack and will not degrade when heated unless temperatures exceed 1000°C.

The use of asbestos can be traced back many centuries and recorded uses can be found amongst the Romans and also in classical literature. The large-scale commercial exploitation of asbestos did not commence however until the late 1800's.

Over time and with increased technological developments the use of asbestos became widespread to the extent that it has been estimated that over 3500 products have been produced with an asbestos content.

Of all the asbestos used in the UK more than 60 per cent was used in buildings. The particular type and grade used varying upon the requirements for chemical resistance, thermal insulation and strengthening characteristics.

The proportion of asbestos found in asbestos based products ranges from 5 per cent to 100 per cent.

The main uses in buildings including the following:

- roofing tiles, felt, guttering
- linings for walls, ceilings and doors,
- heat resistant panels for doors, stairways, ceilings, chutes,
- thermal insulating panels and boards,
- flooring materials,
- lagging for boilers and pipes,
- central heating ducts,
- fire blankets, gloves,
- infill panels, fascias, gas fire surrounds, sprayed application to steel work, boiler houses for thermal insulation and fire protection

The World Health Organisation classifies asbestos as a carcinogen and in the United Kingdom asbestos related deaths have been recorded as early as 1903. Today, in the United Kingdom asbestos is one of the most highly regulated materials. Work on some types of asbestos materials requires the use of specialists licensed by the Health and Safety Executive.

It is currently estimated that asbestos related deaths are between 3500 - 4500 per annum. The majority of these deaths occur through occupational exposure to asbestos. The difficulty with looking forward in terms of the prediction of asbestos related deaths is that the time from exposure to death is considerable (generally 30-40 years) and this complicates the decision

making process and has resulted in delays in the legislative process.

Research is currently on going which has suggested that over the next 30 years the number of victims who will develop asbestos related diseases through low level exposure to the material will increase.

It is important to note that asbestos materials have been widely used for a variety of reasons and when considering any action related to asbestos it is essential to determine the reason for the materials use. This will ensure that, where necessary, an appropriate alternative material is used. This is particularly important where the material has been used for fire compartmentalisation. Regrettably it is commonplace in the construction industry to see items of asbestos removed or recommended for removal and no consideration given to replacement materials. This invariably results in a greater risk being present to occupants in the form of fire spread.

3.0 Asbestos Regulations

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

3.1 The Control of Asbestos at Regulations 2006 (CAR 2006)

These Regulations are supported by a number of Approved Codes of Practice (ACOP) with the requirements of Regulation 4 being set out in numerous

published documents and upon the HSE web site. HSE have also published some guidance on where Regulation 4 will apply, which confirms that the common areas of blocks of flats and sheltered housing schemes are within the scope of Regulation 4 and its' requirements therefore need to be adopted.

More detailed guidance on Regulation 4 can be found in HSG227, a comprehensive guide to managing asbestos published by the Health and Safety Executive. However, in its basic form Regulation 4 requires Duty Holders (The term used to define those in control of the premises) take the following steps:

- Identify asbestos materials through surveying by either sampling or presumption
- Record the presence of these materials and their condition
- Make this information available to those who may disturb the material
- Review the condition of the material on a regular basis.

For management purposes, asbestos materials can be split into two defined groups. These are; those where the use of a licensed asbestos contractor is necessary, and those where a non-licensed contractor complying with the CAR 2006 can be employed. The difference between these materials is

largely judged by the fibre release potential of the material when disturbed during removal operations.

3.2 Licensed Materials

These are products where the risk is deemed sufficiently high to warrant those who work upon these materials to hold a license issued by the HSE.

Examples of licensed materials include; sprayed asbestos, asbestos insulations and asbestos insulating boards and all operatives involved with the work will need to be trained in accordance with Regulation 10 of CAR 2006.

Some of the basic requirements in place for this type of work are the need to notify enforcing authorities prior to commencement of works, the need for enclosures to prevent fibre release, and the monitoring of the working environment during and following work.

The processes in place for dealing with Licensed Materials are well established and documented and are recognised by all undertaking this level and type of work.

3.3 Non-Licensed Materials

This group covers all other items that contain asbestos. Generally, these materials are of a lower risk but must still be treated with care, although the controls required are not as onerous as those for licensed asbestos materials.

CAR 2006 within Regulation 10 has for the first time introduced specific training requirements for all of those who are involved in the removal of non-licensed items. The changes implemented in CAR 2006 have meant that the materials based cut off between licensed and non-licensed work has been withdrawn and replaced with a definition based upon risk assessment.

Examples of these products that can be treated as non-licensed are; thermoplastic flooring and sink mats. With materials such as asbestos cement the general guidance is that these will normally be non-licensed, however, risk assessments will indicate that work with degraded sheets should be undertaken by licensed contractors.

It is important to ensure that non-licensed contractors undertake work in accordance with the requirements of CAR 2006. Our main contractor has the capacity to carry out both licensed and unlicensed asbestos work.

4.0 Scope and Responsibility

4.1 Scope

This management plan provides detail on Northwards' corporate principles relating to the management of asbestos in non-domestic premises including, organisational responsibilities, procedures and record keeping.

This management plan applies throughout Northwards and covers **all non-domestic premises including the common parts of premises such as sheltered housing, multi storey blocks and other blocks of flats / premises with common parts.**

This management plan applies throughout Northwards and covers all **employees, agency and contract staff, tenants and their visitors, service users, visitors, contractor partner staff and all other persons** for whom Northwards has a direct or relevant indirect responsibility for the purpose of protecting their health, so far as is reasonably practicable, when work is undertaken in premises to which they have access.

Complying with this management plan will ensure that Northwards fulfils its legal obligations under the Health and Safety at Work etc Act 1974, the Management of Health and Safety at Work Regulations 1999 and Regulation 4 of the Control of Asbestos Regulations 2006. This management plan is intended as the minimum standard for the organisation to meet.

The scope of this management plan does not include working on asbestos containing materials during maintenance/repair activities or major refurbishments etc by contractors. (i.e. those matters covered in Regulations 6, 7 or 10 of the Control of Asbestos Regulations and the Construction (Design and Management) Regulations 2007 **except** with regard to the provision of information, to those likely to be at risk, on the presence of asbestos, prior to any disturbance of the material.

4.2 Responsibilities

The Executive Management Team is responsible for ensuring that: -

- This management plan is implemented throughout Northwards
- Adequate resources are made available for implementation of the plan

All Directors and Senior Managers are responsible for ensuring that: -

- This management plan is implemented throughout their Directorates/Teams
- Adequate resources are made available for effective implementation

The Director of Business Services shall ensure that procedures for managing asbestos together with any duties or responsibilities delegated under the normal system of management are detailed within their Directorates and Team's health and safety arrangements. They will include the necessary procedures for:

- o Surveying of property,
- o Recording the location and condition of asbestos and presumed asbestos materials,
- o Assessing (and recording) the risk of anyone being exposed to these materials,
- o Preparing a plan to manage the risk to ensure that:
 - any known or presumed asbestos material is kept in good repair
 - material deemed to present a risk is, because of its condition or location, repaired, sealed or removed
 - information is given to those likely to be at risk

- Understanding and fulfilling their responsibilities as Dutyholder as defined in the Control of Asbestos Regulations 2006

Dutyholder

For the purpose of this plan, for the management of asbestos, the Dutyholder shall be the Director of Business Services with their nominated officer being the Head of Health and Safety, supported by the Asbestos and Fire Surveyor.

Dutyholder delegation: It should be noted that although someone else, who is both suitably competent and trained, can be nominated to do all or part of the work, the legal responsibility of the dutyholder cannot be delegated.

Senior Managers are responsible for ensuring that: -

- This management plan is implemented throughout their Teams
- Team Managers and their staff are provided with adequate levels of instruction and training to ensure that they are competent to fulfil the duties / responsibilities delegated to them.

Asbestos Surveyors, Building Surveyors, Mechanical and Electrical Surveyors and their Managers will be responsible for:

- The day to day discharge, carrying out and co-ordination of their Section's or Team's procedures for meeting the requirements of Regulation 4 of the CAR.

- Liaising between their Sections or Teams, other Sections or Teams within Northwards and external organisations and individuals (e.g. Manchester City Council and Manchester Working, Manchester Wide Framework Contractor Partners etc) on issues relating to asbestos in premises.

The Person in Control of a Premises will be responsible for ensuring that

- where control procedures such as the designation of a “Restricted Area” are initiated due to the poor condition of ACM’s found on the premises, they must ensure that the controls imposed are adopted and maintained until circumstances change through remedial or removal works.
- any control procedures which are assigned to them in their asbestos management arrangements are followed.

5.0 Procedures

5.1 Identification of Asbestos Containing Materials (ACMs)

In order to fully discharge the duties imposed on Northwards by the Control of Asbestos Regulations, arrangements have been put in place to identify ACMs within non residential properties and the common areas of our housing.

These arrangements have to accommodate data compiled from the following sources;

- Stock Condition Surveys
- Decent Homes Asbestos Surveys
- Responsive Repair Activity

Stock Condition Surveys:

To facilitate the asset management function of Northwards and as part of the 2007 stock condition survey, undertaken by the external consultant Savills, two types of asbestos survey were carried out as follows;

Type 1 Survey (as defined within MDHs100)

A visual inspection of a representative 20% sample of the various housing archetypes that identified asbestos materials on a presumptive basis only, without recourse to any material sampling or analysis.

This sample type allowed Northwards to develop an appreciation of the scale of any potential ACM problem across the estate and identified any properties that may benefit from future follow-up Type 2 surveys.

Type 2 Survey (as defined within MDHS100)

This level of inspection is similar to the Type 1 survey but it builds on the minimum requirements of assessment to comply with the duty to manage asbestos, with particular reference to the common areas of our sheltered housing schemes, multi-storey blocks, walk-up flats and cottage flats.

100% of these areas were surveyed to this standard and where suspect materials were identified, these were sampled to determine if they had an asbestos content and the level of risk was derived from the material type, condition, location and potential for damage or disturbance.

Decent Homes Surveys:

Whilst the asbestos survey data, obtained from the survey types described above, will be consulted prior to commencing work on any decent home improvement scheme, it is necessary to supplement this information with a site specific asbestos survey to determine if there is any risk from disturbance or damage of any known ACMs as a result of the particular works involved.

These surveys are undertaken by the Northwards Asbestos and Fire Surveyor, based within the Health and Safety Team and he is trained and experienced in this role and fully competent to discharge this duty.

Responsive Repair Activity:

During the course of any day to day responsive repair work, if any suspect material is identified as having the potential to contain asbestos, the surveyor will request that this be investigated by the asbestos team of Manchester Working, our responsive repairs partnering contractor. This team are licensed to carry out asbestos sampling and removal.

A Type 2 survey will be carried out if appropriate and relevant management actions determined to ensure that the asbestos is managed and the repair can be safely completed.

The Northwards Asbestos and Fire Surveyor will remain available to offer advice if required.

Note: Where it is not possible to access any part of a building to determine the potential asbestos risk, then all such materials within those areas must be presumed to contain asbestos unless there is strong evidence from plans, specifications or other records that none is present.

5.2 Recording of Asbestos Containing Materials (ACMs)

There is a duty to record the presence and condition of any known ACMs, in a readily accessible form, so that such information can be made available to protect staff, partnering contractors, tenants and residents and visitors from risks to health.

The decision was taken to store all asbestos risk information within a specific asbestos module of the Promaster asset management computer database.

Such information is classified within the database as either;

- information derived from an actual Type 1 or 2 asbestos survey of the property concerned or
- information cloned from a property of a similar archetype that can be relied upon as indicative information on the asbestos risk present

This database will be managed and updated by the Northwards Asbestos and Fire Surveyor, supported by the Head of Health and Safety and information will be available to be viewed by all those that have access to the database.

The contents of the database has and will be downloaded to our responsive repairs partnering contractor, at weekly intervals, to ensure that relevant asbestos risk information is given to the operatives as part of the associated work order.

5.3 Management Actions

Following the asbestos surveys mentioned in 5.1 above, the asbestos findings reflect that which would typically be expected in a housing stock of the age and type within Northwards. Examination would also suggest that some

asbestos containing materials have been removed in the past and replaced with safer alternatives.

The survey process has revealed that the vast majority of the materials inspected were in good condition and no emergency work was necessary.

As wholesale removal can often create the potential for greater asbestos fibre release than would be the case if undamaged material was left in situ and monitored, with consequential disturbance and inconvenience to our tenants, it is proposed therefore to;

- manage any identifiable asbestos risk through a regime of regular reinspection, educated by the relevant risk category
- respond to any reports of previously unknown suspect material
- respond to any asbestos related incidents
- remove, repair or encapsulate any ACMs that pose a health risk as a result of programmed decent homes improvement work
- label any ACMs within secure plant rooms, lift motor rooms, boiler rooms etc.

6.0 Training

It is critical to the effective management of ACMs that certain key individuals within Northwards are appropriately trained or accredited for the work and responsibilities entrusted to them.

As such the following stakeholders have been identified as requiring appropriate levels of training to evidence competency;

- Northwards Asbestos and Fire Surveyor
- Responsible Person (for asbestos) within Northwards
- Persons in control of premises
- Surveyors
- Contractors

Northwards Asbestos and Fire Surveyor:

This individual has the necessary blend of training and experience to fully discharge the responsibilities placed on him as meets the criteria contained within the Health and Safety Executive guidance in that he;

Possesses the British Institute of Occupational Hygiene (BIOH) qualification *P402 "Building Surveys and Bulk Sampling for Asbestos"* and

Has many years experience of sampling and reporting on ACMs within social housing and commercial situations.

Responsible Person (for asbestos) within Northwards:

As previously mentioned this position is currently held by the Director of Business Services, supported by the Head of Health and Safety and he is aware of the duties placed upon Northwards under his stewardship. Further awareness training will be given to himself and fellow members of the Executive Management Team, should this be required in response to any future legislative changes.

Persons in Control of Premises

Basic asbestos awareness training has already been delivered to the Scheme Managers of Northwards sheltered housing schemes and the caretakers of the multi-storey blocks.

The intention in the near future is that they will hold a 'building log book' which will contain, amongst other essential maintenance information, the asbestos register information for the property under their direct control.

This will then be made available to any visiting contractors and to members of the emergency services, should the need arise.

Additional training will then be delivered to reinforce their responsibilities and the manner in which they must be discharged.

The intention is not, however, to turn them into experts in asbestos but rather equip them with the necessary tools to contribute to the safe management of asbestos and the expectations of their knowledge and how it is to be exercised will be reinforced.

Surveyors:

Surveyors within Northwards generally have an adequate knowledge of the risks posed by asbestos and have received basic awareness training. They also appreciate how and where they fit into the asbestos management plan and how to access appropriate sources of internal competent advice.

- Decent homes surveyors

Prior to any detailed design work taking place on programmed schemes, the surveyor requests a Type 2 asbestos survey, from the Northwards Asbestos

and Fire Surveyor and works closely with the Principal Contractor to ensure that any identified risks are safely managed.

They also assist in ensuring that information on any asbestos removal or treatment is channelled back for Promaster asbestos module updating.

- Responsive repairs surveyors

Asbestos issues are currently delegated to a small number of 'Surveyors with Special Responsibilities' who liaise with the responsive repairs contractors' asbestos team, consulting the Northwards Asbestos and Fire Surveyor if additional guidance is required. They currently record any asbestos information in a spreadsheet form which has been used to update the survey database but the intention is to equip the surveyors with a 'template', in the near future, to allow it to be uploaded directly into the Promaster Asbestos Module.

Contractors:

Attention has already been drawn (in 3.2 and 3.3) to the two categories of work applied to asbestos removal or treatment, these being licensed and non licensed work. Whichever category any work falls within, all operatives involved with the work have to be trained in accordance with the requirements of regulation 10 of the Control of Asbestos Regulations 2006.

All contractors engaged by Northwards, to work with asbestos, have to comply with this requirement and their safe working methods and work on site are regularly audited to ensure compliance.

7.0 Communication of Information

The aim of Regulation 4 of the Control of Asbestos Regulations 2006 is principally to protect workers in the building and allied trades who may come across asbestos in the course of their work. Northwards also has a duty of care, under the Health and Safety at Work etc. Act 1974, to also safeguard the health and safety of their employees, tenants and all others who may be affected by their undertakings.

It is essential therefore that any asbestos risk information is communicated to those who may be at risk and this is done as follows;

Contractor Operatives

- **Decent Homes Programme Work**

Cognisance is first taken of the information held within the Promaster computer database, for the properties being worked on. The Northwards Asbestos and Fire Surveyor then carries out a Type 2 asbestos survey of a representative sample of property types to determine the extent of any asbestos risk present associated with the specific work being undertaken. This information is then passed to the Principal Contractor so that he can determine appropriate control measures in response to any risk.

- **Responsive Repair Activity**

The responsive repair partnering contractor has read only access to the Promaster computer database and any asbestos risk information is automatically appended to the works order being passed on to the operatives.

Surveyors

All Northwards surveyors and engineers will have access to the database and will, as part of the risk assessment process prior to undertaking survey activity, confirm the potential for disturbing any known ACMs during the course of their on site work.

Persons in Control of Premises

It is essential that this group of persons are in possession of the asbestos register information for the property under their control and this will be in the form of a specific report produced from the computer database. The contents of the asbestos register will be reviewed on a regular basis to ensure that any changes to information held centrally within the database is consistent with that held physically on site.

This information should be passed onto visiting contractors, emergency services and should educate any decisions on minor repair activity under their control.

Tenants, Residents and Right to Buys

In response to the duty of care owed by Northwards to the above group, a leaflet 'Asbestos in Your Home' has been provided in the Tenants Handbook which has been issued to all Northwards tenants. This contains appropriate explanatory asbestos information and officer contact details, should tenants have any concerns over suspect materials in their homes and confirms the management actions, such as regular review and inspection regimes, that Northwards have in place to ensure their safety.

Northwards also respond to specific requests for more detailed asbestos information, within individual property addresses, by producing relevant reports extracted from the asbestos database.

It is understood that the provision of such information must be handled in a sensitive and measured way so that individuals are not unduly alarmed and understand that asbestos, in good condition, will do no harm if left undisturbed.

Such information will automatically be passed onto any person buying their property along with the other statutory relevant information.

Information Requests

The Promaster database is capable of providing reports in response to enquiries from councillors, board members, officers etc. and these can be specific to individual addresses, blocks, streets, estates, wards or panel areas.