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Housing Solutions Limited

Asbestos Policy and Management System

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FOREWORD

This document details the system for the management of health risks associated with exposure to asbestos in properties owned and/or managed by Housing Solutions Ltd. It has to be used in conjunction with any asbestos register information for the premises.

Please read this document and ensure you understand all the issues dealt with. Please read this document and ensure you understand all the issues dealt with. If you have any doubts or questions about this policy or procedures, please contact your manager who will be able to provide you with advice or further information.

This document has been produced in partnership with Watson, Wild & Baker Ltd, who are acting as Housing Solutions Ltd's external health and safety advisers on asbestos.

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POLICY STATEMENT

Housing Solutions Ltd will take all reasonable steps to locate Asbestos and Asbestos Containing Materials in the properties that it owns and establish effective systems to manage asbestos:

- Housing Solutions Ltd will maintain an open information policy and will work with customers, residents, staff groups, contractors and statutory bodies to agree and deliver solutions to asbestos issues.
- Housing Solutions Ltd will implement its asbestos management strategy by empowering designated operational staff with the appropriate training, skills and resources needed to safely manage asbestos.
- Housing Solutions Ltd is committed to providing a safe and healthy workplace. It is our policy that asbestos-containing materials shall not be used in our properties.
- Housing Solutions Ltd shall ensure that asbestos-containing materials that pose a serious risk to health, because they are seriously damaged and may release fibres into our premises, shall be removed or encapsulated as soon as possible.
- Housing Solutions Ltd shall ensure that asbestos-containing materials that do not pose a risk to health shall be removed from our properties, when it is safe and cost effective to do so.
- Housing Solutions Ltd shall ensure that asbestos containing materials remaining in situ are managed to so that the risk to the health of our customers, employees, contractors, visitors and other peoples using our premises is minimised.
- Housing Solutions Ltd shall ensure that all work on asbestos containing materials shall be carried out in accordance with the current legal standards using the best working practices.
- Housing Solutions Ltd will ensure that all notifiable works whether licensed or non-licensed shall be carried out by a specialist licensed contractor. No works deemed as notifiable under the control of asbestos regulations 2012 will be carried out by Housing Solutions direct workforce.

SCOPE OF POLICY

The scope of this policy is applicable to all Housing Solutions Ltd managed and maintained buildings.

POLICY DEVELOPMENT

This policy has been developed to allow Housing Solutions Ltd to comply with the Control of Asbestos Regulations 2012, and has regard to L127 Approved Code of Practice - 'The management of asbestos in non-domestic premises'.

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BACKGROUND INFORMATION ABOUT ASBESTOS

Asbestos is the name given to a group of fibrous minerals, composed chiefly of silicates, which occur naturally in many parts of the world. Of the six main types of asbestos, three are commercially exploited. The three main types produced are:

crocidolite - blue asbestos amosite - brown asbestos chrysotile - white asbestos.

Asbestos splits longitudinally into very small fibres which can be inhaled. Many of these will be expelled but some may lodge in the deeper parts of the lungs. As they do not readily dissolve, they may persist for many years and can work their way through to the outer surface of the lung. Inhaling high levels of asbestos fibres over a period of time may eventually lead to diseases for which there is no cure:

- Asbestosis irreversible fibrosis or scarring of the lungs in which the tissue becomes less elastic, making breathing progressively more difficult. This is an industrial disease arising from high levels of exposure to asbestos fibres, including chrysotile, crocidolite and amosite. There is no risk of asbestosis from normal levels of environmental exposure to asbestos.
- Lung cancer an increased incidence of lung cancer has been found in people who work with asbestos. The increase in risk depends on the degree of exposure and is much greater for smokers than non-smokers, but it is generally considered that levels of exposure which do not induce asbestosis do not increase lung cancer risks. The three main types of asbestos can all cause lung cancer but amphiboles such as crocidolite and amosite are considered to be more dangerous than chrysotile.
- Mesothelioma a cancer of the inner lining of the chest or the abdominal wall. This cancer is generally very rare and most cases are due to exposure to asbestos in the workplace. Again, amosite & crocidolite are considered to be more hazardous than chrysotile.

The risk of developing an asbestos-related disease depends on a number of factors, including the type and size of asbestos fibres inhaled; the cumulative dose received; and the time since first exposure.

The main uses of asbestos are, or have been: as a reinforcing agent in asbestos cement sheeting used on walls and roofs; in asbestos cement building products, such as tiles, cold water tanks, pipes and gutters; in insulating board used as wall partitions, fire doors, ceiling tiles, etc.; in yarns and textiles; in lagging and in sprayed coatings for insulation and decorative purposes. Asbestos-reinforced plastics have also been manufactured.

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Exposure to airborne asbestos fibres occurs in both the outdoor and indoor environment. Everyone in the UK is exposed throughout their lives to a very low level of airborne asbestos fibres. These fibres are released through the weathering, damage or deterioration of asbestos-containing materials or from natural sources such as the erosion of rocks which contain asbestos. Background exposure levels are in the range 0.000001-0.0001 fibres per millilitre (f/ml). In addition to normal background exposure, virtually everyone in the UK will have been exposed for a significant part of their lifetime to airborne asbestos fibres released from asbestos materials inside buildings such as schools, offices, public buildings, flats and other housing.

The long term average exposures to occupants working or living in asbestos containing buildings are of the order of 0.0001-0.0005 f/ml. Long-term average exposures are only likely to exceed this range if there is damaged asbestos present which is being regularly disturbed. Higher fibre levels may occur in buildings containing asbestos, especially if the asbestos materials are damaged. However, the risks posed by exposures to such levels are considered to be very small indeed. Moreover, an isolated accidental exposure to asbestos dust of short duration is extremely unlikely to result in the development of an asbestos-related disease.

Asbestos was used widely in building materials, insulation and household products between the 1900s and the mid 1970s. Peak usage occurred in the 1960s to early 1970s. In traditionally built houses and flats, asbestos products (mostly chrysotile) have been used in fittings, for example backing for vinyl flooring. However, there is no evidence of fibre release from these products in buildings, and exposure in traditionally built houses and flats can be considered to be part of the ambient exposure to asbestos.

Asbestos materials are known to have been used extensively in 'non-traditionally' built housing in the 1950s and 1960s but there is little reliable information on the materials used and their locations within the different types of housing. Most 'non-traditional' housing is of steel framed or prefabricated reinforced concrete construction. Asbestos cement sheet was the asbestos material most commonly used in these homes, for roofing or external cladding. Asbestos cement tiles were also specified for roofing. Internally, asbestos cement sheet, mouldings, and wall linings were all used in certain types of non-traditional housing.

'Non-traditionally' built flats are likely to contain significant amounts of asbestos products (amphibole sprayed coatings, lagging, asbestos (amosite) board partitioning, asbestos cement panels, ceiling tiles, etc.).

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LEGISLATION

This Management system will assist Housing Solutions Ltd in complying with its duties under:

- The general requirements of the Health and Safety at Work Etc. Act 1974
- The Management of Health and Safety at Work Regulations 1999
- The Control of Asbestos Regulations 2012
- The Construction (Design and Management) Regulations 2015
- The Construction (Health, Safety and Welfare) Regulations 1996

The Health and Safety at Work etc Act 1974 imposes a statutory duty on employers to ensure; so far as is reasonably practicable, the health, safety and welfare at work of all their employees (except domestic servants in private households). This duty also extends to others who may be affected by the employers' undertakings (work activity) e.g. contractors, tenants, neighbours, visitors and members of the public.

The initial requirement of the Management of Health and Safety at Work Regulations 1999 is for employers to assess the risk to the health and safety of employees and to anyone else who may be affected by the work activity, so that the necessary preventative and protective steps can be identified. It also requires the employer to make arrangements for putting into practice the health and safety measures that follow from the risk assessment.

For any works that fall under the Construction (Design & Management) Regulations 2015 the Planning Supervisor must be notified if asbestos is present in the property, Staff, customers and contractors also need to be informed about the presence of asbestos in the property, to avoid inadvertent damage and fibre release.

The Construction (Health, Safety and Welfare) Regulations 2007 requires that persons carrying out construction works have the necessary training, technical knowledge and experience, or be supervised by a person having such training, knowledge and experience, as may be appropriate having regard to the nature of the activity, to reduce the risks of injury.

The Control of Asbestos Regulations 2012 as Amended regulates all work with asbestos containing materials. The prime objective of these regulations, which are made under the Health and Safety at Work Act 1974, is to prevent exposure to asbestos from work activities and where this is not reasonably practicable to reduce exposure as far as is reasonably practicable.

Regulation 4 of the Control of Asbestos Regulations 2012 places a *duty to manage* on Housing Solutions Ltd for all of its non-domestic premises. Legal precedent has established that the *common parts* of blocks of flats are a non-domestic premise.

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SPECIALIST ADVICE

This document is not intended to provide detailed technical guidance on handling and dealing with asbestos. Staff should refer to the appropriate HSE guidance. Lists of all current HSE publications may be obtained from the HSE Website. Lead staff will be trained to be competent to manage asbestos in buildings. Copies of all relevant publications will be issued to all staff trained by Housing Solutions Ltd.

The Health and Safety Executive has produced a number of Approved Codes of Practice and a number of Technical Guidance Notes. Compliance with all relevant regulations and guidance is necessary so that all work involving asbestos containing materials can be carried out safely without any risk to any person.

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RESPONSIBILITY OF INDIVIDUALS

Group Customer Services Director	The Group Customer Services Director is responsible to the Executive Team for this policy.
	He is to ensure that:
	 The Executive Team is informed of the resources needed to implement this policy;
	 The Executive Team is informed of the implementation of this policy and procedures;
	 to ensure that all persons are provided with the necessary information, instruction and training to fulfil their roles and responsibilities under this policy and these procedures;
	 The Executive Team is immediately informed of any incidents that may affect the image or reputation of Housing Solutions Ltd , or may lead to enforcement action, criminal prosecution or civil action being taken against Housing Solutions Ltd; and
	 Measures are taken to ensure that this policy and procedures are fully implemented.

The Head of Asset Management is responsible to the Group Customer				
Services Director. The Head of Asset Management is to ensure that:				
 The policy and procedures are fully implemented; and 				
 The Group Customer Services Director is fully informed with regards to: 				
 Resources needed to implement the policy; and Any difficulties in the implementation of this policy. 				
 Technical and Maintenance Staff, Property Managers, staff and contractors have received information, instruction and training so that they and their employees know and understand Housing Solutions Ltd's policies and procedures, and can work safely with asbestos. 				
 Reasonable checks are carried out to ensure that contractors are following Housing Solutions Ltd's policies and procedures, and that they are working safely with asbestos. 				

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Head of Asset	
Management cont	 The Group Customer Services Director is immediately informed of any incidents that may affect the image or
	reputation of Housing Solutions Ltd, or may lead to enforcement action, criminal prosecution or civil action being
	taken against Housing Solutions Ltd.

Property Managers	Property managers are those members of the technical, maintenance								
Inc.	and site staff with management responsibility for the property or work								
Asset Investment	being carried out on it. For example technical staff may be responsible								
Manager	for the heating, lighting and ventilation systems whilst the site								
Surveying Supervisor	for the heating, lighting and ventilation systems whilst the site manager is responsible for day to day activities. In this case there is								
Community	more than one property manager for the site.								
Maintenance Manager									
Energy Services	Property Managers are responsible to the Head of Asset Management								
Manager	for the daily implementation of these policies and procedures.								
•									
Operations Manager	They are to ensure that								
Community Services	They are to ensure that:								
Team Leader									
Supported Services	 They fully comply with these policy and procedures; and 								
Team Leader									
Community Housing	 The Head of Asset Management is fully informed with regards 								
Officers	to:								
	 Any training or resources needed to implement the policy; 								
	and								
	 Any difficulties in the implementation of this policy. 								
	 All persons working on the premises are working safely and in 								
	accordance with this policy and procedures;								
	······································								
	 All persons working on the premises have been informed 								
	about any asbestos on the premises in the area where they								
	are working; and								
	 All persons working on the premises know and understand the 								
	procedures in the event that:								
	They discovery or								
	They discover; or								
	Demonstration								
	Damage asbestos.								
	 If staff or contractors are not working safely or are not 								
	complying with these policies and procedures, immediate								
	action is taken and the Head of Asset Management is								
	immediately informed.								

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Property Managers cont	 The Head of Asset Management is immediately informed of any incidents that may affect the image or reputation of Housing Solutions Ltd, or may lead to enforcement action, criminal prosecution or civil action being taken against Housing Solutions
	Ltd.

STAFF TRAINING

The Group Customer Services Director is to ensure that all persons are provided with the necessary information, instruction and training to fulfil their roles and responsibilities under this policy and these procedures.

The Group Customer Services Director is to ensure that asbestos awareness training is attended by all staff that:

- Supervise contractors; or
- Carry out maintenance works or
- Provide advice to customers.

Asbestos awareness training shall include the following topics in appropriate detail, by means of both written and oral presentation, and by demonstration if necessary:

- the properties of asbestos and its effects on health, including the increased risk of lung cancer for asbestos workers who smoke;
- the types, uses and likely occurrence of asbestos containing materials in buildings and plant;
- the general procedures to be followed to deal with an emergency; and
- how to reduce the risk from asbestos.

NOMINATED COMPETENT PERSONS

ACMS UK are nominated to provide advice on this policy and implementation.

Housing Solutions Ltd employees who have successfully completed BOHS Proficiency Module P402 – Surveying for asbestos in buildings, may carry out Management property surveys provided that they follow the instructions in these policies and procedures for carrying out surveys. See 'asbestos surveys'

Housing Solutions Ltd employees who have successfully completed BOHS Course S301 'Asbestos and other fibres' or BOHS Proficiency Module P405 – "Management of Asbestos in buildings" may provide advice for routine minor works.

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A list of all nominated and trained persons is to be maintained by the Head of Asset Management in the format at Appendix 1.

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ASBESTOS SURVEYS

The purpose of asbestos surveys will be to establish the location, form, type and condition of any asbestos containing material with an evaluation of the likelihood of the material being damaged, disturbed or worked on in the future. See Appendix 2 for the survey strategy.

The Head of Asset Management is responsible for ensuring that stock is profiled by property type into the following groups of properties. Profiling of stock must be carried under the support and guidance of a specialist advisor or competent person. Property groups are to be prioritised for surveys as follows:

Property Type	Survey Requirements						
Offices, care homes and non-	All buildings built before 1990. ++++						
domestic parts of buildings.							
Tower Blocks of Flats	All non-domestic parts (offices, lift & lift shafts, stair wells,						
	plant rooms, and common areas), plus two void-flats in each						
	block built before 1990. ++++						
All other types of flats and	All non-domestic parts (lift & lift shafts, stair wells and						
maisonettes	common areas), plus at least one flat in each property built:						
	Pre 1919 - Random sample +						
	1919-1945 - Random Sample ++						
	1946-1979 - Random Sample +++						
	1980-1989 - Random Sample +						
	Post 1998 - Nil						
Houses	All traditional properties built:						
	Pre 1919 - Random Sample +						
	1919-1945 - Random Sample +						
	1946-1979 - Random Sample ++						
	1946-1979 - Random Sample +						
	Post 1985 - Nil						
	All properties of non-traditional construction built before						
	1998 +++						
Rooms inc bed-sit flats	Nil						

Note: Nil is the lowest priority and ++++ the highest priority

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After the stock has been profiled the Head of Asset Management is to carry out any necessary property surveys. The Head of Asset Management is to:

- Check the asbestos register to determine whether there is an identical property. If there is an identical property, cloned information may be used. If cloned information is used the asbestos register is to make clear that the data is cloned and information presumed.
- If there is no identical building a Management survey is to be carried out of the property. If the building is occupied, only a Management survey of the property may be carried out.

Where no refurbishment works are planned and an asbestos survey is to be commissioned then the Head of Asset Management is to instruct the surveying company to:

- Carry out a Management Survey as detailed by HSG 264; and
- Record the types of all building materials (whether asbestos or not) used and their location;
- Carry out an assessment of all asbestos containing materials
- IMMEDIATELY NOTIFY the Head of Asset Management if there are asbestos containing materials found that require immediate removal or encapsulation to eliminate or reduce a serious risk to health.

If refurbishment works or demolitions are being planned, then the Head of Asset Management is to ensure that a competent person (not necessarily an asbestos surveyor) examines the available information to determine whether there is enough information available elsewhere to assess the risk or determine a full survey is required. If there is suitable information available then a decision may be made without a refurbishment survey providing that the building has been inspected before any works are carried out to verify the available information. If a survey is required, then the Head of Asset Management is to;

- Provide the surveying company with a detailed scope of works; and
- Instruct the surveying company to carry out a Refurbishment Survey, as detailed by HSG 264, of building elements or areas where works are to be carried out; and
- A Management Survey, as detailed by HSG 264, of all other building elements in the remainder of the property.

The Head of Asset Management is to instruct the surveying company that all reports:

- Must contain fully annotated plans showing the types and locations of all materials (whether asbestos or not); and
- Must contain a full photographic record of;
 - All asbestos containing materials (whether sampled or not);
 - All materials sampled;
 - Any building material that may be mistaken for an asbestos containing product;

VOIDS

When a property becomes void the opportunity should be taken to verify any cloned information and remove/encapsulate any asbestos containing material in poor condition. To enable this to be carried out the property manager is to notify the Head of Asset Management of any void

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properties. The Head of Asset Management is to arrange an asbestos inspection of void properties to verify any cloned information and to arrange any necessary removal/encapsulation works.

ASBESTOS REGISTER

The Head of Asset Management is to ensure that all information from asbestos surveys and asbestos information from the stock condition survey is entered on a computer database. This information is to be made available to all persons planning or carrying out work in Housing Solutions Ltd.'s properties.

Where a particular property has not been surveyed and cloned information is being used, the ultimate user must be informed that the information is cloned. Therefore, site operatives must be warned not to rely solely on that information.

UPDATING THE REGISTER

The Head of Asset Management is to ensure that:

- The asbestos register is updated whenever the asbestos containing materials are inspected or removed from the property,
- Records of inspections & alterations are retained on the property file.

INFORMATION TO CUSTOMERS

Housing Solutions Ltd will maintain an open information policy and will work with customers, residents and leaseholders to agree and deliver solutions to asbestos issues. General information about asbestos will be provided through customers' newsletters and through customer's handbooks.

Customers will be provided on request, log in details to access our comprehensive asbestos information database where they can view the location of asbestos containing materials within their home (where applicable).

Incoming customers to a property that has been void will be provided with information relating to the location of asbestos containing materials upon sign up.

Where asbestos is discovered in a property, during an asbestos survey, the Property Manager is to ensure that the tenant is informed of the discovery.

Where an asbestos survey is carried out due to planned refurbishment works the customer residing in the property will be provided with a copy of the survey report.

INFORMATION TO CONTRACTORS

Housing Solutions Ltd recognises its responsibilities for providing proper information to contractors. The Head of Asset Management is to ensure that:

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- The information contained within appendix 3 is sent to all contactors each year, with a copy
 of Housing Solutions Ltd.'s policies and procedures for:
 - Work involving asbestos containing material
 - non-asbestos works
 - emergency maintenance works
 - action to be taken if asbestos containing material is found during non-asbestos work
- All contractors have a safe system of work that will prevent exposure to asbestos,
- Appropriate measures are in place to ensure that their employees are complying with their safe systems of work,
- Contractors are provided with all available information regarding asbestos in the properties in which they will carry out works.

The Head of Asset Management is to ensure that contractors are instructed to pass the following information to all their workers who work in Housing Solutions Ltd properties.

ASBESTOS WARNING

Asbestos is a health hazard if inhaled. As it is possible there may be asbestos containing materials in this property you must check whether the property is entered on the asbestos register. If there is an entry on the asbestos register you must check the asbestos survey so you can plan your work.

If you cannot identify a material you must presume it contains asbestos and seek advice.

If there is a risk that asbestos containing materials may be disturbed, you must:

- Provide a plan of works and a method statement before you start work;
- Exclude occupants from the immediate work area;
- Take suitable precautions to minimise the risk of disturbing asbestos containing materials.

In the event that asbestos containing materials are found, disturbed or damaged during non-asbestos works; you must STOP WORK, leave the area safe and protected and contact (name) on (telephone number).

MARKING OF ASBESTOS CONTAINING MATERIALS

Areas in domestic premises that contain asbestos containing materials are to not be marked.

Areas within non-domestic premises that are accessible to the public and contain asbestos containing materials are to not be marked.

Areas within non-domestic premises that are not accessible to the public and contain asbestos containing materials must be marked with a suitable warning sign.

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INSPECTION OF ASBESTOS CONTAINING MATERIALS

Asbestos containing materials in domestic premises are not to be inspected on a regular basis. If there is a concern reported about the condition of asbestos containing materials in an occupied property, the asbestos containing materials are to be inspected within two working days from the date of the report to determine what action, if any, is required. The inspecting person is to determine what action is to be taken. In deciding what works are required, consideration is to be given to the occupants wishes. If there is a difference of opinion about what action is required then advice is to be sought from the local environmental health department. See appendix 4 for the decision algorithm what action is to be taken following a complaint.

In non-domestic premises the Head of Asset Management is to ensure that:

- All asbestos containing materials are inspected regularly for signs of damage and wear etc.
- The findings are to be recorded and the register updated.

The frequency of inspection is to be determined by the likelihood of damage occurring followed by the potential for exposure to airborne asbestos fibres. See Appendix 5.

PLANNED WORKS

Before carrying out any planned works including void property works the Property Manager must;

- Determine the scope of works to be undertaken and the likelihood of disturbance of any ACMs or unknown or hidden materials
- Check the asbestos register to determine if the there is a works survey for the property
- Check if any cloned data is accurate for the specific by inspecting the property

If the Property Manager determines that the work is not likely to disturb any asbestos containing materials, the contractor may to be authorised to carry out the works.

If works are planned and no suitable information is available or cloned information cannot be verified as accurate then a works survey of the areas must be completed. See 'asbestos surveys'.

If major refurbishment or demolition works are planned then if no information is available, or information indicates that asbestos was present, or is likely to be present then the Property Manager is to arrange for a Refurbishment survey of the areas. See 'asbestos surveys'.

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PLANNED ASBESTOS WORKS

The Property Manager is to ensure that if asbestos materials are liable to be worked upon or disturbed in any way, advice (recorded in writing) shall be obtained through the specialist advisor/Competent member of staff before any work is carried out, unless it is minor-planned works carried out in accordance with the prescribed work method.

The Property Manager is to ensure that:

- All work on asbestos containing materials is to be carried out in accordance with the Control of Asbestos Regulations 2012, associated approved codes of practice and guidance.
- A separate risk assessment must be carried out if work is to be undertaken on any asbestos containing material, taking into account the work process, the methods and equipment being used and the protective measures being taken.
- All work on asbestos containing material is to be carried out by a licensed asbestos contractor, unless the work is exempted.
- The licensed asbestos contractor must provide a method statement and a plan of work. The contractor must give notice to the appropriate enforcement agency if required. A copy of the plan of work, method statement and notification to the enforcement agency must be sent to the Head of Asset Management prior to the commencement of any work involving asbestos.
- The plan of work and method statement is checked in good time to allow the work to be carried out. The Contractor is to be advised in writing whether the method statement is satisfactory or not. If the method statement is not acceptable, the licensed asbestos contractor is to be informed and given the opportunity to amend the method statement.
- The work is carried out in accordance with the procedures described in the plan of work and method statement.
- That air monitoring has been undertaken outside the asbestos work area during such works where a risk assessment deems it necessary.
- That the contractor has verification of the clearance certificates once the works have been completed.
- A competent person checks that the quality of all work carried out on the asbestos containing materials is acceptable. See 'competency of staff' for further details.

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RESPONSIVE MAINTENANCE

For responsive maintenance and other high volume short duration work the Property Manager must ensure the works order contains a flag indicating that the property may contain ACMs if appropriate. The Property Manager must also ensure that the contractor has appropriate access to the information held for the property and if the presence of asbestos is confirmed, presumed or a material is confirmed to not contain asbestos.

If the job turns into a larger planned maintenance job then the procedure for planned works should be followed.

EMERGENCY MAINTENANCE WORKS

In an emergency, contractors are to be authorised to carry out works to make safe the situation.

If there is a risk that asbestos containing materials may be disturbed, occupants must be excluded from the immediate work area and suitable precautions taken to minimise the risk of disturbing asbestos containing materials.

In the event that asbestos containing materials are disturbed or damaged, work must stop after any necessary steps to prevent a risk to health or further damage have been taken. The Property Manager must then be informed and the procedures contained in 'action to be taken if asbestos containing material is damaged' must be followed.

DISCOVERY OF ASBESTOS CONTAINING MATERIAL DURING NON-ASBESTOS WORKS

When asbestos containing material is found during the course of any non-asbestos works; work must stop after any necessary steps have been taken to prevent a risk to health or further damage. Advice must then be obtained from the Property Manager.

If work can continue without the asbestos containing material being disturbed, the Property Manager may allow the work to continue.

However, if the work is likely to disturb or damage the asbestos, the area is to be made safe and no further work is to be allowed until it can be carried out safely in accordance with the relevant procedures contained in 'work involving asbestos containing material'.

The Property Manager is to:

- Record any advice given in writing;
- Update the asbestos register;
- Inform the Head of Asset Management of the finding.

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DAMAGED OR DISTURBANCE OF ASBESTOS CONTAINING MATERIAL DURING NON-ASBESTOS WORKS

When asbestos-containing material is damaged or disturbed during the course of any nonasbestos works; work must stop after any necessary steps have been taken to prevent a risk to health or further damage. The Property Manager is to obtain advice from the Head of Asset Management. The advice is to be recorded in writing.

If it is likely that asbestos fibres were released into the air of an occupied area, then the Property Manager is to ensure that:

- All persons are excluded from the immediate area;
- Air monitoring is to be carried out immediately;
- The area is cleared of any asbestos containing dirt or debris;
- The air monitoring is repeated;
- Remedial works are not carried out on asbestos insulation or asbestos insulation board;
- No soft furnishings, carpets, clothing or any personal property is destroyed or removed from the property until further advice has been obtained.

The Head of Asset Management must:

- Immediately notify the Group Customer Services Director;
- Make a written record of the event, including witness statements & photographs;
- Carry out an immediate investigation;
- Forward copies of the records and investigation report to the Group Customer Services Director and Housing Solutions Ltd.'s H&S officer/responsible person.

Housing Solutions Ltd.'s H&S officer must ensure that:

- The customer and any other exposed person is informed in writing of the incident and any significant findings of the investigation;
- A case file is kept of the incident;
- The enforcing authority has been notified if the release of airborne asbestos fibres is sufficient to cause damage to the health of any person.

ASBESTOS WASTE

The Head of Asset Management is to ensure that waste contaminated by or containing asbestos is bagged and labelled, and then classified in accordance with the Hazardous Waste (England and Wales) Regulations 2005 and the List of Waste (England) Regulations 2005. The hazardous waste must be disposed of by a licensed contractor at a licensed site. Copies of all relevant paperwork must be kept on file.

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AUDIT

The Asbestos Management procedures will be audited as per the following table:

Audit Type	Frequency	Responsible Person
Property check*	Quarterly	Head of Asset Management
Internal audit by appointed	Annually	Group Customer Services
H&S consultant		Director
External audit carried out by	Bi-annually	Group Customer Services
external auditors		Director

* To ensure that all properties that require an asbestos survey are recorded on the master database with a date for re-inspection.

The Group Customer Services Director must record the findings of an audit. The system should be amended to incorporate the findings of an audit.

All persons are to ensure that proper records are maintained and available on demand for inspection by internal auditors.

These records shall include but not be limited to the following:

- Documentary evidence that the Asbestos Policy and Management System has been implemented and complied with;
- Details of the qualifications of the named competent persons;
- Details and location of the asbestos register;
- Evidence that all contractors have been provided with details of the register;
- Evidence that demonstrates that all staff know who the competent person is and how they may be contacted;
- Evidence that contractors are being checked onsite;
- Tenants have received information that relates to asbestos discovered in their homes.

RECORDS

The Head of Asset Management is to ensure that the following records are kept:

- A register of all asbestos surveys of premises in Housing Solutions Group stock
- Amendments of the asbestos register
- Advice given on asbestos to staff, tenants and contractors
- Advice received from consultants and HSE
- Air monitoring reports
- Audit records
- Details of inspections of asbestos containing materials
- Details of all asbestos removal or encapsulation work
- Incident reports
- Method statements for work involving asbestos containing materials
- Notifications to the enforcement agency
- Waste disposal certificates

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KEY PERFORMANCE INDICATORS

The Head of Asset Management will be responsible for reporting the following key performance indicators through the Quarterly Directors Health and Safety Report.

All properties that require a periodic inspection of asbestos containing materials have been reinspected in line with the policy - Target 100%

COMPLAINTS

All customer complaints relating to Asbestos will be logged as per the company's complaints policy and procedures.

ADDITIONAL INFORMATION AND LINKS

ARCA - Asbestos Removal Contractors Associationwww.arca.org.ukEA - Environment AgencyHSE - Health and Safety ExecutiveUKAS- United Kingdom Accreditation Servicewww.ukas.com

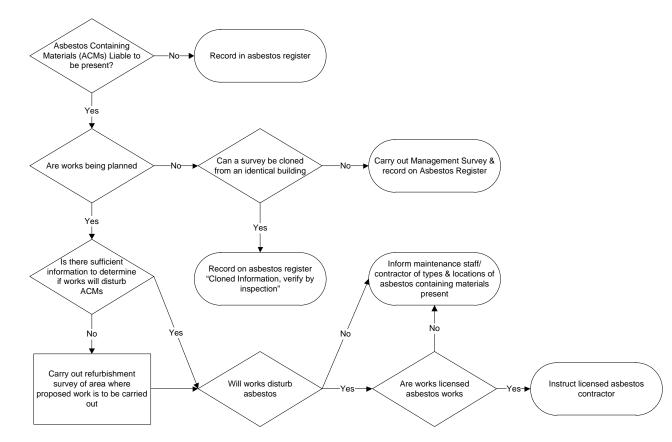
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APPENDIX 1 – NOMINATED PERSONS

Competent persons	Mobile	email
	07870665548	
Andy Grimshaw – Associate Director ACMS UK		Andy.grimshaw@acmsuk.com

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APPENDIX 2 – SURVEY & PLANNED WORKS PROCEDURE



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APPENDIX 3 – INFORMATION FOR CONTRACTORS

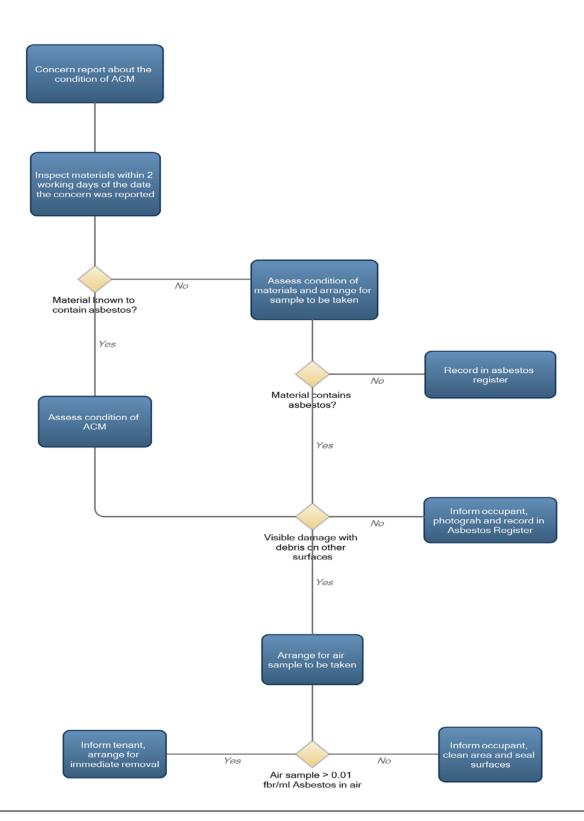
Asbestos Procedures in Housing Solutions Ltd.'s Properties

As some of Housing Solutions Ltd.'s properties contain asbestos, we require you to take the following measures to prevent exposure to asbestos fibres whilst working within our properties:

- (i) You must ensure that all personnel who may work in Housing Solutions Ltd.'s properties have received suitable & sufficient training on the following items:
 - the properties of asbestos and its effects on health, including the increased risk of lung cancer for asbestos workers who smoke;
 - the types, uses and likely occurrence of asbestos containing materials in buildings and plant;
 - the general procedures to be followed to deal with an emergency; and
 - how to reduce the risk from asbestos.
 - the procedures in the event that:
 - They discover; or
 - Damage asbestos.
- (ii) Before you carry out any work on behalf of Housing Solutions Ltd, you must:
 - Ask your contact if the property is entered on the asbestos register;
 - Ask to see the asbestos survey if the property is entered on the register;
- (iii) If your work is likely to disturb asbestos, you must:
 - Provide a suitable plan of work & method statement;
 - Only allow authorised personnel to carry out work in Housing Solutions Ltd.'s properties;
 - Provide the site operative's with all the information relating to the property;
 - Ensure that site operative's know and understand the procedures in the event that:
 - They discover; or
 - Damage asbestos.
- (iv) Take suitable steps to ensure that your personnel work safely and follow Housing Solutions Ltd.'s procedures when on site. If there is a risk that asbestos containing materials may be disturbed, occupants must be excluded from the immediate work area and suitable precautions taken to minimise the risk of disturbing asbestos containing materials. In the event that asbestos containing materials are found, disturbed or damaged during nonasbestos works; work must stop after you have taken any necessary steps to prevent a risk to health or further damage. Your contact must be informed and the relevant procedure must be followed.

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APPENDIX 4 – INSPECTION ALORITHM



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APPENDIX 5 – ACM INSPECTION FREQUENCIES

Housing Solutions use a detailed priority risk assessment to identify the frequency of re-inspection of asbestos containing materials in common parts and assist in taking decisions on remedial action where necessary. The assessment is based upon the possibility of fibre release and exposure to airborne fibres.

The possibility of fibre release is determined by:

- 1. Product Type
 - a. Bound Materials. e.g.; artex, plastics including vinyl tiles and bitumen. (0)
 - b. Hard products. e.g. AC products. (1)
 - c. Insulation Boards. (2)
 - d. Friable Products. e.g. papers, millboards, textiles and sprayed insulation. (3)

2. Vulnerability to damage.

- a. Fully encapsulated in product. (0)
- b. Hard cover. e.g. Covered by sheet metal, ply wood, hard board or building materials. (1)
- c. Soft cover. e.g. Painted or covered with non-asbestos textile (2)
- d. Unprotected. (3)
- 3. Condition
 - a. No visible damage. (0)
 - b. Minor damage. e.g. Scratches & cracks (1)
 - c. Major damage. e.g. broken or frayed pieces (2)
 - d. Loose debris. (3)

The possibility of airborne exposure is determined by:

- 4. Location.
 - a. Outside. (0)
 - b. Large well-ventilated area. (1)
 - c. Large or well-ventilated area (2)
 - d. Small or unventilated area. (3)
- 5. Occupancy.
 - a. Unoccupied. (0)
 - b. Occupied for < 1 hour. (1)
 - c. Occupied for 1-4 hours. (2)
 - d. Occupied > 4 hours. (3)
- 6. Likelihood of disturbance.
 - a. Unlikely. (0)
 - b. Possible. (1)
 - c. Probable. (2)
 - d. Certain. (3)

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Frequency of inspection of ACMs

	Potential for fibre release							
e	Score	0-3	4-6	7-9				
Potential for airborne exposure	6-7	Six-Monthly	Three- monthly	Monthly				
ential fo expo	4-6	Annually	Six- Monthly	Three- monthly				
Pot	0-3	Two Yearly	Annually	Six-Monthly				