



Housing Services

**Asbestos Safety Management
strategy
(2021)**

Document Control

Document details

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1. Introduction

1.1 - Purpose of this strategy

The Asbestos Management strategy supports the London Borough of Havering overarching Housing Services Policy for the Management of Asbestos and offers guidance to staff and contractors on all matters relating to the management and control of asbestos within LBH's housing stock, communal areas and domestic properties.

1.2 - Aims of this strategy

All materials within LBH properties or PSL properties MUST be presumed to contain asbestos and treated accordingly; unless, or until, strong evidence is provided to the contrary, except properties built after 2001. These can be reasonably expected to NOT contain any asbestos containing materials.

LBH will ensure that asbestos materials are not disturbed, except where it is considered that removal is the best approach and this is undertaken in a controlled environment.

1.3 - Scope of this strategy

The Asbestos Management strategy is written for all London Borough of Havering Housing Services employees, contractors and their sub-contractors that have responsibility for organising, overseeing or undertaking asbestos related works or who are otherwise involved in works that could involve the disturbance of Asbestos Containing Materials.

This strategy covers all aspects of the asbestos management process including:

- The legislation, regulations and guidance relating to asbestos management and the responsibilities of the 'duty holder' under the Control of Asbestos Regulations
- The dangers of Asbestos, the health risks associated with exposure to asbestos fibres and where asbestos can be found in buildings
- How information relating to asbestos is recorded.
- How documentation is accessed and retained
- The methods for communicating asbestos risk to tenants and other relevant parties
- Asbestos surveys and risk assessments
- Asbestos removal procedures
- Requirements for training, including how training will be delivered and how records retained
- How the processes and procedures will be monitored to ensure they are effective

1.4- Delegated authority to make minor changes to this strategy

To ensure that this strategy is operated fairly and legally throughout, the Assistant Director of Property & Land Services, in consultation with the Director of Housing, will be able to approve minor amendments; i.e. amendments that do not significantly change this strategy or associated procedures.

1.5- Timescales for this policy

This policy will commence in March, 2021 and will be subject to review annually.

However, it may be revised beforehand to accommodate legislative and/or regulatory changes that may occur during the interim.

1.6- Legal context of this policy

This policy operates in the context of the following legislation and Codes of Practice:

- The Landlord and Tenant Act 1985
- Health and Safety at Work Act 1974
- Control of Asbestos Regulations 2012
- Hazardous Waste (England and Wales) Regulations 2005
- The Management of Health and Safety Regulations 1999
- The Workplace (Health Safety and Welfare) Regulations 1992
- The Housing Act 2004
- The Defective Premises Act 1972
- Construction Design and Management Regulations 2015
- Reporting of Injuries, Disease and Dangerous Occurrences Regulations 2013

This strategy should be read in conjunction with these related documents:

- Asbestos Policy and procedures
 - LBH Corporate Health and Safety Policy
 - Fire Safety Management Plan
 - Repairs Policy
 - Voids Policy/Procedure
 - Mutual Exchange Policy
 - Tenancy Management Policy
 - DPA and GDPR guide for Housing staff
-
- L143 Managing and working with asbestos (2013)
 - HSG 264 Asbestos: The Survey Guide (2012)
 - HSG 247 Asbestos: The licensed asbestos contractor's guide (2006)
 - HSG 227 A comprehensive guide to managing asbestos in premises

2. Background

Asbestos is a product which was widely used up until the 1990s.

Whilst it has been used because of its excellent heat resistance and thermal properties, it has been identified as a hazardous substance that can offer significant health issues.

Asbestos can be found in a variety of forms and uses, including (but not limited to) asbestos cement, artex ceilings, soffits and fascia boards and pipe lagging, and comes in a number of different types.

When asbestos containing materials are damaged, fibres can be released and the inhalation of these fibres can lead to a number of fatal diseases of the lung.

3. Roles and Responsibilities

Duty Holder: Chief Executive of Havering
 Appointed Person: Assistant Director of Property Service
 Responsible Person: Asbestos and Legionella Compliance Manager

4. Explicit Duties

Stakeholder	Duty
Duty Holder	Delegate duties to Appointed person
Appointed Person	Undertake all functions delegated by the accountable person Oversee all asbestos related activity and put in place a rigorous assurance approach Ensure adequate resource (Staff and financial) to deliver the AMP Approve changes to the AMPs Determined the appropriate resident engagement strategy Have sufficient budget and management responsibility to deal with an asbestos incident Oversee reporting to regulatory bodies
Responsible Person	Manage day to day operation asbestos programme and associated works Ensure policy and AMP are adhered to Update asbestos register Determine relevant training programmes for stakeholder and ensure they are implemented Update Appointed person and Duty holder on relevant changes to legislation Manages contractors and surveyors undertaking asbestos works Provide expert advice to other teams undertaking

	works Report any non-compliance to the duty holder Lead of response to incidents
Asset Manager	Ensure asbestos register is being correctly updated
All Housing Staff including Caretakers	To ensure the AMP is enforced To ensure asbestos is considered as part of any projects
All Staff	To report any areas of concern within an appropriate timescale

5. Minimum Standards (Procurement)

All asbestos surveying and removal companies must be UKAS accredited. Confirmation will form part of the procurement process. Contractors that cannot show they are accredited will be excluded from the tender.

All contractors tendering for works in which there is the potential to disturb asbestos must demonstrate that their operatives and/or subcontractors are asbestos aware trained and an ongoing commitment to training new staff. This will be tested through the tender process and at ongoing contract meetings.

All contractors must have a clear asbestos process in place for dealing with incidents.

6. Surveys

6.1 Type of Surveys

- Managements surveys – to locate as far as is reasonably practical the presence and extent of asbestos containing materials in a property which could be damaged or disturbed by normal occupancy and to assess their condition. This is the principle survey and is used to populate the asbestos register.
- Refurbishment and Demolition surveys – are required before any work is carried out which cannot be undertaken using controlled measures and is used to determine the extent and scope of any asbestos removal or remediation works required before works. Contractors will be expected to undertake RFD surveys for any invasive works which cannot be completed under prescribed measures.
- Re-inspection surveys – these are re-inspection of management surveys and are used to monitor the condition of any identified asbestos containing materials.

6.2 - Cloned Surveys

Where possible actual surveys will be undertaken in all properties. Where this is not possible or whilst the full register is being developed, it may be possible to clone some surveys using data on archetypes of a similar nature. It must be clearly marked on the asbestos register where information is cloned.

6.3 - Programme

All programmes for undertaking asbestos surveys will be on Keystone asset management system.

The Asset Management team will be responsible for overseeing the asbestos team provide new surveys and complete works to remain compliant.

The Asbestos team will be responsible for updating Keystone and Swordfish as required.

6.4 - Survey Regimes

All surveys will:

- Comply with HSE guidance HSG 264 Asbestos: The Survey guide.
- Be carried out by a UKAS accredited asbestos surveyor or company.

The process for obtaining surveys is shown in appendix 5.

- **HRA Properties**

All HRA properties, including garages, outhouses and related building will have a management level asbestos survey.

LBH will undertake a re-inspections every 3 years and the asbestos register updated accordingly unless the asbestos survey identifies a requirement for more frequent re-inspections.

- **PSL Properties**

The landlord will be required to provide a management level asbestos survey to LBH prior to LBH placing tenants in the property.

All contractors undertaking asbestos works must, at the end of the works, provided an updated asbestos surveying detailing the scope of works, the items removed and the extent of any remaining asbestos.

7. Risk Assessment

Each survey will contain a risk priority score for each identified asbestos occurrence; this is scored in line with HSG227.

Any actions will be assessed in line with the priority assessment approach (appendix 2) and detailed in the asbestos report, however the below table details our general approach.

Overall Risk Score	Risk Rating	Action: Access to asbestos	Action: Where works are planned	Action: Where no works are planned	Re-inspection timeframe	Reassurance air test frequency
High	> 18	Restrict access to the area using physical barrier and warning notices	Where practicable remove. If not practicable encapsulate or remediate immediately	In order of preference dependant on reasonable practicalities immediately ; remove encapsulate, remediate	Unless removed, re-inspect every 6 months	Unless removed, reassurance air testing every 3 months
Medium	13 - 18	Restrict access to the material	Where practicable remove. If not practicable encapsulate or remediate immediately	Add to planned programme to; remove or encapsulate or remediate	Unless removed, re-inspect every 12 months	Not unless instructed by the duty holder
Low	< 13	No immediate action required	No immediate action required	No immediate action required	Monitor closely and re-inspect every 2 years	Not unless instructed by Duty Holder

8. Works to Asbestos

All asbestos removal work will be undertaken by licenced asbestos contractors.

For category B works which include working with asbestos, contractors can utilise Category B trained staff in line with regulation.

All work must have site specific Risk Assessments and Method Statements before work is started.

9. Data Storage and Sharing

9.1 - Asbestos Register

All information regarding asbestos will be held on an asbestos register held on the housing asset management system, Keystone. As a minimum it will hold information on:

- Building Address
- UPRN Number
- Survey Date
- Surveyor Name
- Type of survey undertaken
- Floor
- Room
- Item Description
- Sample number if applicable
- Product type
- Extent
- Condition
- Asbestos type
- Material Assessment Score
- Priority Assessment Score
- Remediation action required

All asbestos surveys will be stored on LBH document management system, Swordfish and linked to the asset register.

All properties containing asbestos will have a cautionary flag showing on Open housing to inform staff.

Staff who may undertake any form of invasive works **MUST** check the asbestos register prior to undertaking the work and take appropriate action.

9.2 - Data owners and control

The compliance officers will be responsible for ensuring all data relating to asbestos, including actions which flow, are correctly updated, stored and managed. This may be via spreadsheets or a proprietary system.

They will be responsible for overseeing the asbestos programme, and the raising, tracking and completion of works orders on the repairs system.

The Asset Management team will provide an overview and scrutiny function to ensure the data is being entered correctly and report on any anomalies found.

9.3 - Contractors

Appointed contractors are expected to request and review relevant information available within the asbestos register which will be provided to them as relevant.

Contractors will be expected to provide risk assessment and method statements prior to commencing any surveying or works.

All contractors staff must be asbestos awareness trained, this will be checked at progress meetings.

Only licenced contractors will be able to undertake any working with or removal of asbestos materials.

9.4 - Residents

Where residents request a copy of the asbestos information held on their homes, LBH will provide this within 28 days, this may be for general information or to support an application for Landlords consent to undertake works.

At each void property we will leave a copy of the asbestos management survey as part of the welcome pack, this will include appropriate advice on managing asbestos and what to do in the event of an incident.

10. Removal and Encapsulation

Identified asbestos will be managed according to the risk approach detailed above.

Generally undamaged asbestos will not be removed unless other works programmes facilitate its easy removal.

Asbestos may be encapsulated only in areas where it is highly unlikely that it will be accidentally disturbed by residents or contractors, all encapsulated asbestos must be recorded on the asbestos register.

11. Asbestos Labelling

LBH will not generally label asbestos in domestic properties or in communal areas as it is unsightly and can heighten residents' concerns unnecessarily.

However where possible we will label asbestos in plant rooms and likely works areas to assist contractors, although contractors will be expected to satisfy themselves as to the presence of asbestos and not rely solely on labelling.

12. Training

Relevant training will be provided to all staff. This will be dependent on roles and responsibilities.

For staff the below training will represent the minimum competency standard required for each role. However we will accept that where staff are working towards a qualification, and supervised by suitably experience managers, then they will be able to undertake the role. This approach will support the in-house development of staff.

Stakeholder	Training	Frequency
Duty Holder	Asbestos awareness training	Bi annually
Appointed Person	Asbestos awareness training	Bi annually
Responsible Person	BHOS P405	Bi annually
Housing Staff including caretakers	Asbestos awareness training	Bi annually

13. Incident Management

If asbestos is discovered or damaged as part or works the following process must followed in appendix 3 and the form at appendix 4 completed and returned to the responsible person.

All incidents will be recording on the corporate incident system.

14. Unauthorised Alterations

Please refer to the Landlords consent policy.

15. Equal Opportunities Statement

The Council will seek to ensure that this strategy is, at all times, implemented in a manner that is fair to all sections of the local community.

All applicants for housing or re-housing will be invited to indicate if they wish to make use of the Council's translation and interpretation services, or if they require additional services to enable them to access and understand the strategy to ensure that they are not disadvantaged in any way.

They also will be invited to provide details of ethnic origin, sexuality, disability and other equalities information. Provision of this information is not obligatory or a requirement for acceptance of an application.

However, such information will help monitor the number and types of protected characteristics requiring hostel support, and will help ensure that service improvement evolves in line with any changing local needs.

Equalities records will be kept and monitored to ensure hostel accommodations are offered and allocated fairly.

This strategy will be regularly reviewed ensure it is not operated in any way that could discriminate or disadvantage against any particular group of people.

All information provided will be kept confidential and treated with respect at all times.

16. Data Protection Statement

Havering Council takes personal privacy matters very seriously and will never share the individual's personal data without their prior knowledge, unless required to do so by law.

For full details about how the Council protects personal data, please visit [Havering Council Data Protection policy](#).

17. Dissemination and communication of this strategy

Housing Services will consult with all affected stakeholders, directly or indirectly, to ensure this strategy fulfils its purpose to be clear and transparent.

This strategy will be made available internally and externally in hard copy and electronic versions, as well as various formats – such as easy read, multi-lingual, braille and audio - upon request.

18. Implementation of this strategy

This policy will take effect from March, 2021.

Responsibility for the successful implementation of this strategy will be with Havering Council's Assistant Director of Property & Land Services.

19. Monitoring and Review of this strategy

In the interests of continuous improvement, this policy will be monitored and reviewed annually to ensure it remains relevant, up-to-date and fit-for-purpose for the Council and its customers.

APPENDIX 1 – MATERIAL ASSESSMENT

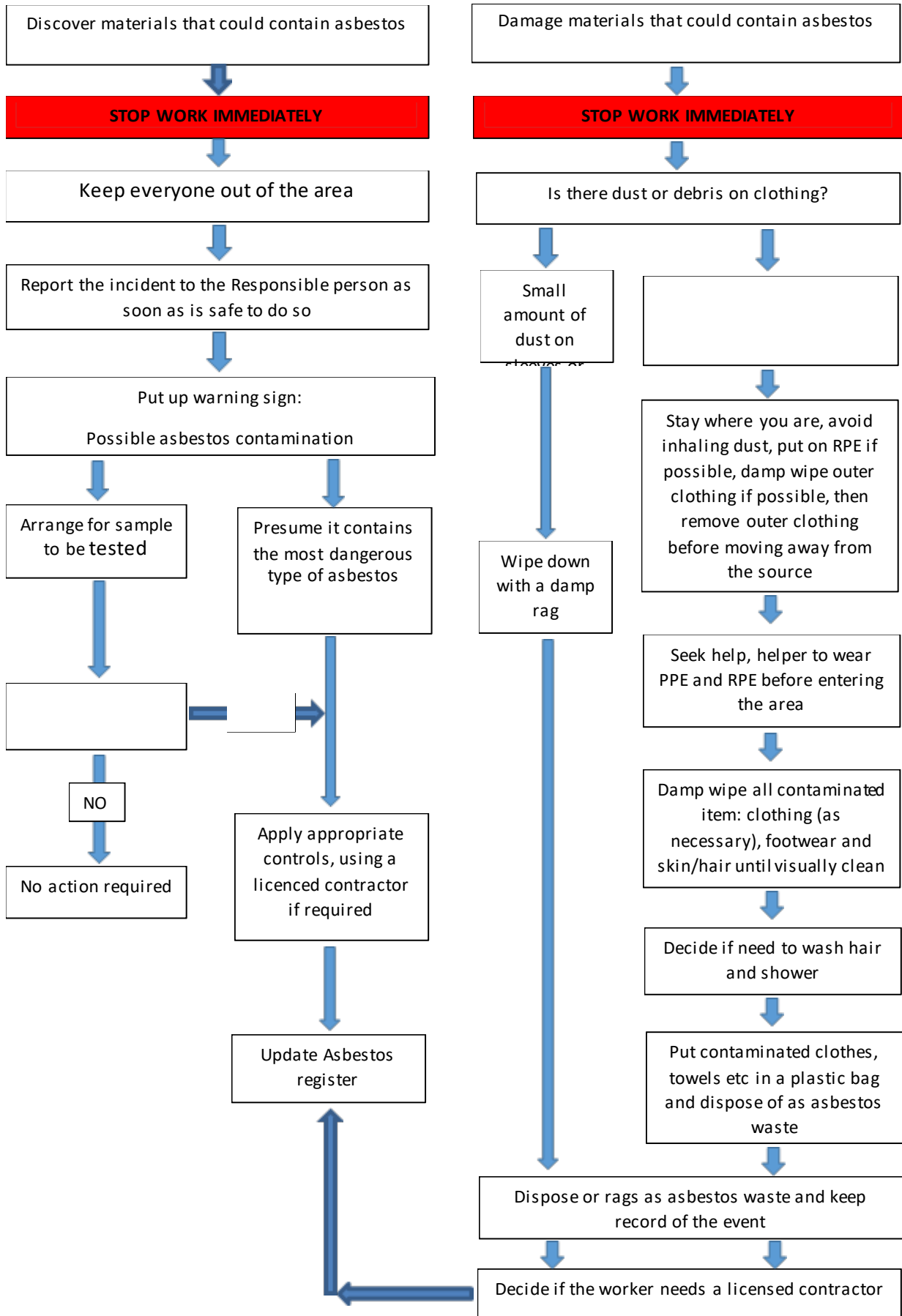
Sample variable	Score	Examples of scores (see notes for more detail)
Product type (or debris from product)	1	Asbestos-reinforced composites (plastics, resins, mastics, roofing felts, vinyl floor tiles, semi-rigid paints or decorative finishes, asbestos cement etc).
	2	AIB, millboards, other low-density insulation boards, asbestos textiles, gaskets, ropes and woven textiles, asbestos paper and felt.
	3	Thermal insulation (eg pipe and boiler lagging), sprayed asbestos, loose asbestos, asbestos mattresses and packing.
Extent of damage/deterioration	0	Good condition: no visible damage.
	1	Low damage: a few scratches or surface marks, broken edges on boards, tiles etc.
	2	Medium damage: significant breakage of materials or several small areas where material has been damaged revealing loose asbestos fibres.
	3	High damage or delamination of materials, sprays and thermal insulation. Visible asbestos debris.
Surface treatment	0	Composite materials containing asbestos: reinforced plastics, resins, vinyl tiles.
	1	Enclosed sprays and lagging, AIB (with exposed face painted or encapsulated) asbestos cement sheets etc.
	2	Unsealed AIB, or encapsulated lagging and sprays.
	3	Unsealed lagging and sprays.
Asbestos type	1	Chrysotile.
	2	Amphibole asbestos excluding crocidolite.
	3	Crocidolite.
Total		

Score	Potential to release asbestos fibres
10 or more	High
7-9	Medium
5-6	Low
4 or less	Very low

APPENDIX 2 – PRIORITY ASSESSMENT

Assessment factor	Score	Examples of score variables
Normal occupant activity Main type of activity in area Secondary activities for area	0 1 2 3 As above	Rare disturbance activity (eg little used store room) Low disturbance activities (eg office type activity) Periodic disturbance (eg industrial or vehicular activity which may contact ACMs) High levels of disturbance, (eg fire door with asbestos insulating board sheet in constant use) As above
Likelihood of disturbance Location Accessibility Extent/amount	0 1 2 3 0 1 2 3 0 1 2 3	Outdoors Large rooms or well-ventilated areas Rooms up to 100 m ² Confined spaces Usually inaccessible or unlikely to be disturbed Occasionally likely to be disturbed Easily disturbed Routinely disturbed Small amounts or items (eg strings, gaskets) 10 m ² or < 10 m pipe run. >10 m ² to ≤50 m ² or >10 m to ≤50 m pipe run >50 m ² or >50 m pipe run
Human exposure potential Number of occupants Frequency of use of area Average time area is in use	0 1 2 3 0 1 2 3 0 1 2 3	None 1 to 3 4 to 10 >10 Infrequent Monthly Weekly Daily <1 hour >1 to <3 hours >3 to <6 hours >6 hours
Maintenance activity Type of maintenance activity Frequency of maintenance activity	0 1 2 3 0 1 2 3	Minor disturbance (eg possibility of contact when gaining access) Low disturbance (eg changing light bulbs in asbestos insulating board ceiling) Medium disturbance (eg lifting one or two asbestos insulating board ceiling tiles to access a valve) High levels of disturbance (eg removing a number of asbestos insulating board ceiling tiles to replace a valve or for recabling) ACM unlikely to be disturbed for maintenance 1 per year >1 per year >1 per month

APPENDIX 3 – INCIDENT MANAGEMENT PROCESS



APPENDIX 4: EXPOSURE INCIDENT REPORT

Part A: (Completed by the affected person and issued to the Responsible Person)	
Name:	
Job title:	
Company:	
Tel. no.:	
Site address of occurrence	
Specific Location of occurrence:	
Description of material:	
Brief description of what occurred:	
Signed (Affected Person)	Signed (Manager)
Name / Position of Manager:	
Part B (to be completed by the Responsible Person)	
Name:	
Position:	
Has the area been cordoned off?.....YES / NO	
Were all safe system of work procedures followed?.....YES / NO	
What can be implemented to prevent a re-occurrence? (detail)	
What remedial action has been implemented to make safe the ACM?	
What was the estimated level of exposure of asbestos?f/ml	
In damaging the ACM, has the control limit or action level been exceeded?.....YES/NO	
If yes to the above, has RIDDOR 1995 been complied with?.....YES/N/A	
Signed:	Date:

APPENDIX 5: ORDERING A SURVEY OR WORKS

