

1.0 CONTEXT

- 1.1 Asbestos-containing materials (ACMs) were used for a wide range of construction purposes in new and refurbished buildings until 1999 when all use of asbestos was prohibited. This extensive use pre-1999 means there are still many buildings in the UK with ACMs.
- 1.2 Where ACMs are in good condition and unlikely to be disturbed they do not present a risk. However, where the materials are in poor condition or are disturbed or damaged, asbestos fibres may be released into the air, and, if inhaled, may cause serious lung disease, including cancer, more commonly known as Asbestosis.
- 1.3 In 2003, in preparation for the Asbestos Control Regulations 2004, an independent comprehensive asbestos audit was carried out by GWHG; recording 100% compliance within the general housing stock (i.e. there is no ACMs) and
- 1.4 A low risk incident (cement: external pipework) was recorded (2003) at the office premises. In November 2019 a routine instructed management survey identified asbestos fibre debris in the boiler room. An independent investigation and report attributed ACM to historic encapsulation of fibres within paint that had started to degrade. Remediation works were instructed. Routine monitoring is in place to contain this risk.
- 1.5 Following stock transfer, GWHG carried out surveys of both common areas and sample houses to the Hyndland & Argyle stock, in 2009 & 2011 respectively, and identified the presence of asbestos (e.g. hall cupboards/ceilings, common areas). This led to the establishment of comprehensive monitoring arrangements including information sharing with contractors and agents, and advice to residents to mitigate the risk.
- 1.6 A systems review in late 2012 and subsequent 2014¹ Asbestos Management Plan (AMP) outlined existing mitigation strategies in respect to The Control of Asbestos Regulations 2012; to deliver robust recording, monitoring and compliance framework across GWHG stock profile in line with Approved Code of Practice².
- 1.7 Policy Review 2019³ enabled a risk and compliance review, and alignment with standard policy structures.
- 1.8 External Systems Audit (June 2021) provided reassurance of regulatory compliance and set in motion the development of a Management System, as a suite of documents and procedures in support of enhancing regulatory compliance and operational practices.

2.0 AIMS

- 2.1 Implement measures for the safety of staff, contractors; and residents in respect to Asbestos.
- 2.2 Demonstrate legislative compliance and best practice through policy systems, frameworks, and operational controls.
- 2.3 Provide assurance of measures in place to demonstrate regulatory compliance.
- 2.4 Promote a continuous improvement attitude, and positive culture, towards Health & Safety across all stakeholders.

3.0 DEFINITIONS

- 3.1 ACM – Asbestos Containing Material
- 3.2 CAR12 – Control of Asbestos Regulations 2012
- 3.3 AMP – Asbestos Management Policy
- 3.4 AMS – Asbestos Management System
- 3.5 MC – Management Committee
- 3.6 CE – Chief Exec
- 3.7 ARP – Asbestos Responsible Person

4.0 POLICY STATEMENT

¹ MC R6 (16/09/14)

² Health & Safety Executive ACOP 2013

³ MC R12 (24/09/19)

- 4.1 It is recognised that Glasgow West Housing Association (GWHA) has a duty under the Health and Safety at Work etc. Act 1974, as supported by subordinate legislation, to ensure, so far as is reasonably practicable, the health, safety and welfare of its employees, service users, contractors, the general public and others who may be affected by its undertakings.
- 4.2 It is also recognised that the management of asbestos related risk falls within the organisation's general responsibilities set out in point 4.1, above.
- 4.3 To this end, the organisation will comply with the Asbestos Management duties defined and implied in the *Control of Asbestos Regulations 2012 (CAR12)*. It is the policy of GWHA to ensure that, as far as is reasonably practicable, no persons will be exposed to risks to their health due to exposure to any ACMs that may be present in any of the properties it owns, manages or occupies.

5.0 POLICY

- 5.1 This policy document is supported by an *Asbestos Management System*, comprising a suite of supporting information, bespoke to the needs of GWHA, structured for ease of operational use.
- 5.2 Within that framework roles and responsibilities are clearly defined (See Appendix 1).
- 5.3 The AMS sets out that towards ensuring compliance GWHA will, so far as reasonably practicable, aim to:
 - 5.3.1 Ensure the prevention of exposure to risks associated with ACMs.
 - 5.3.2 Ensure that any ACMs that may be present in any of its buildings are maintained in a condition so as to prevent the possibility of any harm to health occurring,
 - 5.3.3 Promote awareness of the risks from ACMs and the Association's Management Procedures through training and induction of relevant staff,
 - 5.3.4 Provide adequate resources to ensure the provision of appropriate information, instructions and training.
 - 5.3.5 Ensure a commitment to comply with all relevant asbestos legislation, Approved Codes of Practice, Health and Safety Executive Guidance Notes and to commit to the safe disposal of any asbestos waste in accordance with the appropriate legislation.
 - 5.3.6 Ensure that a representative proportion of properties built pre 2000 are subject to an Asbestos Management Survey Programme and an Asbestos Register for these buildings is prepared and maintained. This Register will undergo regular reviews and will be updated after any treatment and/or removal works have been undertaken.
 - 5.3.7 Ensure that an appropriate Asbestos Refurbishment or Demolition Survey strategy is in place in accordance with current legislation.
 - 5.3.8 Ensure only UKAS accredited asbestos consultancies are used for asbestos surveying works, asbestos air testing and asbestos analysis work.
 - 5.3.9 Implement an effective asbestos management strategy in order that appropriate measures such as encapsulation, labelling, inspection, working with, or removal of, ACMs can be undertaken.
 - 5.3.10 Ensure that an appropriate system is installed, maintained and implemented for the management of all ACMs identified in the Register. Such a system is to be capable of recording the risk, the needs and priorities for treatment and/or removal.
 - 5.3.11 Ensure that all Contractors and Sub Contractors engaged to carry out work on any of the Association's buildings are provided with adequate information on asbestos which may be disturbed by their works.
 - 5.3.12 Ensure that information regarding the presence of asbestos is contained in tender documentation as may be appropriate.
 - 5.3.13 Ensure Licensed Contractors and/or Sub Contractors carry out ALL Asbestos Licensable Works and Competent Contractors carry out ALL Asbestos Minor Works.
 - 5.3.14 Ensure all Non-Licensed Contractors carrying out Asbestos Non-Licensable Works are trained in safe working procedures and have appropriate insurance cover for the work being carried out.⁴
 - 5.3.15 Ensure that relevant staff of the Association and local contractors are provided with appropriate training in this Policy and these Procedures
 - 5.3.16 Regularly review the Asbestos Management Policy and Procedures.
- 5.4 This Asbestos Management Policy marks the adoption of the AMS as GWHA's routine operational practice.
- 5.5 The AMS will continue to develop with supplementary controls and process maps.

⁴ See decision flowchart detailed in AMS AP5

6.0 COMPETENCE

- 6.1 Staff training will be provided to ensure policy, and management system awareness and Asbestos Roles and Responsibility understanding through range of external, and internal training measures, including routine team meetings, planning and support, wider annual health & safety refresher training, and new staff induction processes. See Appendix 1.

7.0 DOCUMENT CONTROL

- 7.1 The Asbestos Management System relies upon the maintenance of a range of documentation, for which the ARP is responsible. The following summarises the principal components of the system:
- 7.1.1 Asbestos Register, Property Asbestos Management Plans, interpretive reports etc.
 - 7.1.2 Survey and Sampling Reports Folder
 - 7.1.3 Policy & Procedures Document
 - 7.1.4 Asset Register – incorporating property list / relevant premises (i.e. post 2000)
 - 7.1.5 Approved Asbestos Contractors and Consultants List
 - 7.1.6 Training Records
 - 7.1.7 Incident Records
 - 7.1.8 Asbestos Works Records
 - 7.1.9 General construction and maintenance works records
 - 7.1.10 Audit, review and monitoring records

8.0 AUDIT & REVIEW

- 8.1 The ARP will ensure internal audit of the Asbestos Management System twice a year (See PI appendix 5).
- 8.2 The audit / review will take account of all policies and procedures, asbestos register, training records and all records associated with asbestos works, including review of all documents in section 7 above.
- 8.3 The compliance with policy will be reported to MC bi-annually through routine health & safety reporting; with incident and investigation reporting as appropriate to Audit Sub-committee as part of health & safety register reporting, or MC in line with Notifiable event / HSE RIDDOR⁵.
- 8.4 Routine bi-annual external audit of the EVH Landlord Safety Manual (first due Nov '23) will incorporate review of AMS against regulatory compliance and best practice (ASC reporting effective March 2024).

9.0 CONTINUOUS IMPROVEMENT

- 9.1 GWAHA is committed to achieving continual improvement in the management of risk associated with asbestos. This will take cognisance of learning through the scheduled audits, review of the policy and procedures and the introduction of additional controls where knowledge or technology on the subject develops; and as the risk assessment, monitoring and control schemes dictate (for example learning from investigations).
- 9.2 The ARP will be responsible for overseeing the entire Asbestos Management System and will champion the continual improvement programme.

10.0 ASBESTOS (Technical) PROCEDURES

- 10.1 The following procedures have been prepared to ensure compliance with the Organisation's Asbestos Policy and the defined Roles and Responsibilities of key personnel. As such, these procedures should be treated as Organisation 'policy' and any deviation will not be permitted without the express permission of the ARP or CE.
- 10.1.1 Duty to Manage (AP0)
 - 10.1.2 Prohibition on staff handling asbestos (AP1)
 - 10.1.3 Identification of suspect materials (AP2)
 - 10.1.4 Asbestos Register (AP3)
 - 10.1.5 Planning and Organising work on buildings (AP4)
 - 10.1.6 Work with asbestos materials (AP5)
 - 10.1.7 Tenant Information & Work Procedures (AP6)
 - 10.1.8 Purchasing Housing Stock (Acquisitions) (AP7)
 - 10.1.9 Asbestos Incidents, Investigations, and Claims (AP8)

⁵ RIDDOR - Reporting of Injuries, Diseases, and Dangerous Occurrences Regulations (2013)

11.0 FEEDBACK AND COMPLAINTS**11.1 Feedback**

- 11.1.1 GWha tenants and other customers may provide feedback about this document by emailing admin@glasgowwestha.co.uk

11.2 Complaints

- 11.2.1 Tenants with a grievance arising from the Asbestos Management Policy will be considered in accordance with GWha's Complaints Handling Procedure.

12.0 REVIEW

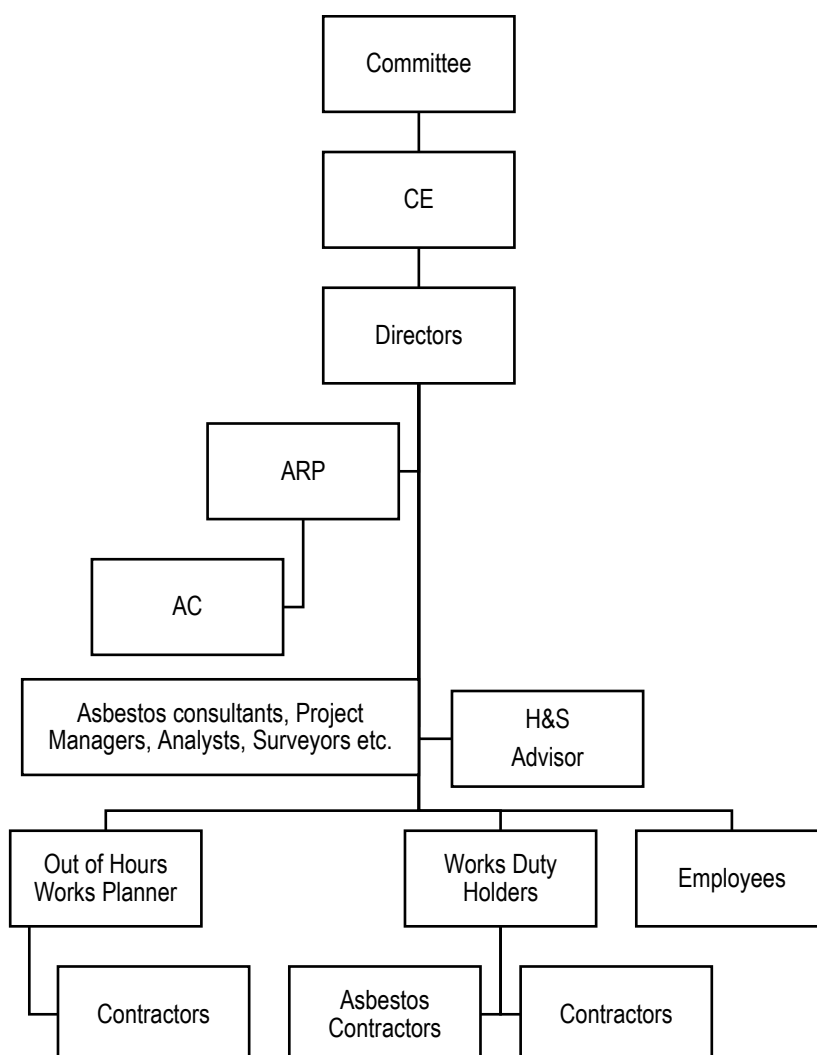
- 12.1 This Policy will be reviewed every 3 years, or sooner, subject to a change in legislation or circumstance.
- 12.2 The Policy, in parts, attempts to summarise current legislation. In any case of conflict between the two, legislation will always preside.

13.0 DELEGATED AUTHORITY

- 13.1 Delegated authority is granted by the Management Committee to the Chief Executive and Staff to implement this Policy and the associated procedures.

APPENDIX 1

The following chart summarises the organisational structure which facilitates a cascading of responsibilities down through the management chain to ensure those with the most appropriate daily operational functions can manage, supervise and physically carry out asbestos related control measures as appropriate. The subsequent sub-sections provide further detail on these roles and responsibilities.



Role Title	Delegated to
Committee	See current committee membership
Chief Executive	Chief Executive
Directors	Technical Director Services Director Corporate Director
Asbestos Responsible Person	Technical Director
Asbestos Co-ordinator	Technical Manager
Works Duty Holders	Property Services Officers, Technical Officers, Repairs and Factoring Manager
Out of Hours Works Planner	City Building
Employees	All relevant employees
Contractors	See approved contractor list
Asbestos Contractors	See approved contractor list
Asbestos Consultants	External consultancy