



# Asbestos Policy

2020

Housing and Property Service

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## 1. Purpose

- 1.1. To effectively manage all asbestos containing materials across Epping Forest District Council's property portfolio and to reduce the asbestos related risks to as low a level as is reasonably practicable.
- 1.2. To ensure asbestos works are properly scoped, serviced and managed in accordance with legal requirements and best practice.

## 2. Policy statement

- 2.1. Epping Forest District Council will manage, so far as reasonably practicable, all asbestos containing materials (ACMs) falling under its control in such a manner as to minimise the risk of any person being exposed to asbestos fibres. The Council will aim to achieve this policy by:
  - Detailing the arrangements and procedures that the Council will use to ensure compliance with the Control of Asbestos Regulations 2012;
  - Identifying and managing Asbestos Containing Materials (ACMs) within relevant buildings. Where it is not reasonably practicable to identify ACM, for example ACM that may be located in inaccessible areas, then the Council will presume that asbestos is present and manage accordingly;
  - Risk assessing each identified ACM, taking into account the likelihood, and the likely number of people that might be exposed, in the event of an uncontrolled release of asbestos fibres;
  - Implementing appropriate control measures to reduce the risk of exposure of people to asbestos fibres from each ACM. The following general principles will be applied:
    - where ACM is assessed as being in good condition then this will generally be left in situ and managed.
    - where ACM is assessed as posing a risk to health it will be, so far as is reasonably practicable, removed or encapsulated.
    - where removal or encapsulation is not reasonably practicable then access to the ACM will be managed to reduce the risk of exposure to as low as is reasonably practicable.
  - Implementing a system of monitoring of each remaining ACM at intervals determined by risk assessment;
  - Carrying out a Refurbishment and Demolition survey as an integral part of the planning process for any refurbishment or demolition works carried out in Council owned, managed or occupied premises;
  - Planning, managing, delivering and monitoring all work that could result in the release of asbestos fibres. In the case of works that involve the removal or encapsulation or other activities that will lead to the release of asbestos fibres, regardless of asbestos type, these will only be carried out by organisations licensed to carry out such works by the Health and Safety Executive (HSE);
  - Devising and implementing emergency procedures to reduce the risk of exposure of people to as low as is reasonably practicable in the event of an unplanned and/or uncontrolled release of asbestos fibres;
  - Providing suitable and sufficient information, instruction, training and supervision to employees and contractors to reduce the risk of uncontrolled release of asbestos fibres as low as is reasonably practicable;
  - Providing all relevant asbestos safety information and maintain dialogue with our customers and work pro-actively in conjunction with our contractors; and

- Reviewing this policy and any associated procedures at regular intervals, or following any uncontrolled release of asbestos fibres, to ensure that it is working efficiently and effectively.

### **3. Roles and responsibilities**

#### **3.1. Duty Holder – Chief Executive**

- 3.1.1. Overall day-to-day responsibility for health and safety matters at Epping Forest District Council and the implementation of this policy. The Chief Executive shall ensure that appropriate resources and systems are in place and that senior managers and other staff adequately discharge their duties in accordance with this policy.

#### **3.2. Responsible Person – Chief Operating Officer**

- 3.2.1. Responsible for ensuring the objectives outlined within the Asbestos Policy and the Asbestos Management Plan are understood and acted upon at all levels within the organisation.
- 3.2.2. Ensure that planning, budgets and resources are available in order to enable strategic and operational objectives to be accomplished, as far as reasonably practicable.

#### **3.3. Responsible Person – Service Manager Property Maintenance**

- 3.3.1. Responsible for the day-to-day management of all asbestos matters associated with building fabric, services and infrastructure.
- 3.3.2. Responsible for the division of roles and responsibilities and for ensuring that an Asbestos Management Plan is developed, implemented and reviewed.
- 3.3.3. Responsible for ensuring the objectives outlined within the Asbestos Policy and the Asbestos Management Plan are understood, communicated and acted upon by persons under their control.
- 3.3.4. Overall responsibility for the management of risks associated with exposure to asbestos, by ensuring:
  - All Council properties constructed prior to 2000 are subject to a management survey;
  - A record of all identified and/or presumed ACM is maintained and is available for inspection as and when required;
  - All ACM identified within management surveys is risk assessed in accordance with HSE approved methods. This will include consideration of the type, location, condition and extent of any ACM and the likelihood and severity of any potential disturbance and uncontrolled release of fibres;
  - Control measures identified by ACM risk assessments are implemented, as appropriate;
  - Suitable and sufficient resources, including access to competent asbestos advice and management, are available;
  - A suitable and sufficient “Refurbishment and Demolition” survey is carried out, as part of the project planning process for all invasive works on relevant building fabric, services and infrastructure;
  - Asbestos risks associated with works notified to Property Maintenance by other parts of the Council are assessed and that suitable and sufficient control measures are identified and implemented;

- Suitable and sufficient asbestos information, instruction, training and supervision is made available to any person who may potentially be exposed to an uncontrolled release of asbestos fibres;
- Records are maintained of all asbestos-related information, instruction and training provided to Council employees and contractors;
- Suitable and sufficient emergency procedures are developed and implemented to reduce risks to persons as low as reasonably practicable following an uncontrolled release of asbestos fibres;
- Emergency procedures are communicated, as appropriate, to others;
- The written Asbestos Management Plan (AMP) is reviewed, at least annually to ensure that risks associated with ACM are being managed effectively; and
- Progress in ensuring risks of exposure to asbestos fibres are being managed is reported to the Council's Health and Safety team.

### **3.4. Asbestos Coordinator – Team Manager Operational Assets and Compliance**

3.4.1. Responsible for the implementation of the Asbestos Management Plan including the:

- Distribution of information;
- Co-ordination of Corporate and individual training requirements;
  - Asbestos Awareness Training;
  - Asbestos Management;
- Instigation of management procedures;
- Liaison between management and employees;
- Recording of incidents or complaints which may affect the Asbestos Policy Statement or Asbestos Management Plan;
- Reporting under RIDDOR regulations, informing and liaising with the Councils Health and Safety Officer; and
- Review of Asbestos Policy and Asbestos Management Plan.

3.4.2. Responsible for the day to day functioning of the Asbestos Management Plan and implementation of routine on-site procedures including:

- Maintenance procedures;
- Contractor control;
- Permits to work;
- Re-inspections;
- Emergency procedures;
- Ensuring copies of the Site Asbestos Survey Report and relevant information relating to asbestos surveys / re-inspections is updated and available to all concerned; and
- Instigation of further asbestos surveys and re-inspections, as and where required.

3.4.3. Responsible for the implementation of on-site procedures for planned works including:

- Review of the Asbestos Register;
- Instigation of further asbestos surveys, where required;
- Re-inspections of the asbestos materials;
- Ensuring relevant information is provided to relevant persons relating to policy, management plan and changes relating to the management of asbestos; and

- Centralising the filing system with new surveys, re-inspections, changes to asbestos infrastructure and any other information that is critical in providing relevant information to all.

### **3.5. Deputy Asbestos Coordinator – Principal Building Surveyor – Operational Assets and Compliance**

3.5.1. Responsible for maintaining and updating data and records relating to asbestos materials and associated works through:

- Inspection and monitoring of retained asbestos materials;
- Update of asbestos registers;
- Recommend action plans;
- Consult on, manage and monitor asbestos related works;
- Advise client on statutory requirements; and
- Review and updating of the Asbestos Policy Statement and Management Plan.

### **3.6. Property Maintenance staff**

3.6.1. Specific members of the Property Maintenance team have day-to-day responsibility for co-ordinating works associated with the management of asbestos. This will include:

- Manage actions where known or presumed ACM is assessed as posing risks to health;
- Ensure that work is undertaken in accordance with the Contractors Permit to Work system or other agreed safe system(s) of work;
- Ensure the planning of works includes a check of existing asbestos survey information and where necessary the commissioning of a suitable asbestos survey as a standard;
- Ensure that all consultants and contractors undertaking works on building fabric and services are competent to do so, have received the required information, instruction, training and supervision to undertake these works in accordance with the Council's health and safety policies, procedures and specifications;
- Co-operating with Duty Holders and responsible persons to ensure that asbestos safety is not compromised, and that Duty Holders can fulfil their duties;
- Ensuring that the planning phase of all works on building fabric and services falling under their control includes a suitable asbestos survey;
- Co-ordinate project information with the relevant contractors in sufficient time to enable the appropriate asbestos surveys to be undertaken during the project planning phase;
- Ensure that all contractors falling directly under their control have received suitable and sufficient information, instruction, training and supervision to enable them to undertake the works in accordance with the Council's Health and Safety policies, procedures and specifications;
- Ensuring that no work which could result in the release of asbestos fibres is allowed to be started on any project until there is appropriate asbestos information in place;
- Ensuring that all asbestos surveys, removal information and the results of any air monitoring are recorded on the Property Maintenance Asbestos Register database;

- Advising Duty Holders and Responsible Persons in writing, as soon as possible, of any issues that may arise which lead them to reasonably believe that they will not be able to fulfil their asbestos safety duties;
- Ensure that all work i.e. clearance certificates, plans of work, waste consignment notices, air monitoring as necessary, four stage air clearance certificates and reoccupation letters is completed as appropriate;
- Maintain and update the Property Maintenance Asbestos Register database; and
- Where reason arises to suspect that the Asbestos Policy is, in part or in whole, no longer valid, bring this to the attention of the Responsible Persons to ensure that the plan is reviewed and, where necessary, revised.

### **3.7. Contractors**

3.7.1. All contractors employed by the Council must be able to demonstrate their commitment to Health and Safety best practice and fully comply with the Council's policies.

3.7.2. Contractors are responsible for ensuring they comply with this Policy when undertaking any activity within the Council's properties.

3.7.3. Contractors will, if required, evidence that they provide suitable and sufficient training for their staff in asbestos awareness and non-licensed work activities in accordance with the Control of Asbestos regulations 2012 and the Task Essentials Guide HSG210.

3.7.4. On all projects, contractors shall:

- Plan, manage and monitor their own work and that of their workers;
- Check the competence of all their appointees and workers;
- Train their own employees;
- Provide information to their workers; and
- Ensure that there are adequate welfare facilities for their workers.

3.7.5. Where projects are notifiable under the Construction Design and Management Regulations, contractors must also:

- Check that the client is aware of their duties, check that a CDM co-ordinator has been appointed and ensure that the HSE has been notified before the work starts;
- Co-operate with the principal contractor in planning and managing work, including reasonable directions and site rules;
- Provide details to the principal contractor of any contractor engaged in connection with carrying out work;
- Provide any information needed for the health and safety file;
- Inform the principal contractor of any problems with the plan; and
- Inform the principal contractor of reportable incidents.

### **3.8. General Employees and Visitors**

3.8.1. To co-operate with the Council in the application of the Asbestos Management Plan by:

- Adhering to Asbestos related signage located across the Council;
- Informing management of damaged or disturbed asbestos materials;
- Not disturbing suspect or known asbestos materials unless undertaking specific asbestos removal / remediation work;

- Ensuring adherence to information, instruction and training where provided;
- Consulting the Site Asbestos Survey Report; and
- Complying with permit to work procedures and health and safety requirements.

#### **4. Managing the Asbestos Policy**

- 4.1. The Council has a 'duty to manage' the non-domestic elements of its housing stock and its operational properties to protect anyone using or working in the premises from the risks to health that exposure to asbestos causes. It has a duty to ensure work carried out by its contractors within all its properties complies with the Control of Asbestos Regulation 2012.
- 4.2. The Council shall, as far as reasonably practicable, identify the location of all ACMs or materials presumed to contain asbestos and ensure that the risks posed are suitably risk assessed and that adequate control measures are implemented to ensure that asbestos fibres are not released. These will include:
- All work which could, or could potentially, give rise to the release of asbestos fibres is planned, implemented, monitored and reviewed to eliminate, so far as reasonably practicable, the risk of asbestos fibre release;
  - Where risk elimination is not practicable, the Management Plan for the project should detail how these risks will be controlled to reduce asbestos fibre release to a tolerable level, and in any case below proscribed control limits and action levels;
  - These procedures include a means for ensuring that employees, residents and occupiers are advised of any risks associated with ACM and are consulted in a timely manner on any planned works on ACM;
  - These procedures include a means for ensuring that contractors, subcontractors, consultants and surveyors are consulted in a timely manner and provided with all suitable and sufficient information regarding the location of ACM within the property; and
  - Only trained persons, competent in the Control of Asbestos Regulations 2012 will be employed to work on Council projects.
- 4.3. This Policy will be made available to Qualis Management the Councils housing repairs contractor, all employees, contractors, subcontractors, consultants and Council staff.
- 4.4. All tenants of the Council will be provided with facts about Asbestos in the Home, the probable location of ACMs, how to manage it and how to get advice shown in Appendix 11.1.

#### **5. Identifying asbestos containing material and undertaking risk assessments**

- 5.1. Where existing asbestos containing materials are in good condition and are not likely to be damaged, they will be left in place; their condition monitored and managed to ensure they are not disturbed.
- 5.2. Management and Refurbishment and Demolition (R&D) surveys will be conducted in accordance with the standards set out in the Health and Safety Executive's publication HSG264 "The Survey Guide". All such surveys commissioned will be required to meet these standards.



- 5.3. Management and R&D surveys will be undertaken on all communal areas, all void dwellings including abatement work where identified.
- 5.4. Combined Management and R&D surveys will be carried out where major projects are undertaken (Bathrooms, Kitchens, Electrical Rewire and Heating Upgrades, etc.), including remediation and abatement work where required.
- 5.5. The condition of properties will be inspected by staff when they visit them in association with their routine work. Where there are asbestos materials (including presumed asbestos material) in poor condition this will be reported to the Compliance team who will arrange for a survey and remedial work as needed.
- 5.6. All asbestos surveys undertaken will include both “material” and “priority” assessments of all ACM. Both types of assessment require a competent person to evaluate the risks posed by various properties of the ACM and to numerically codify those risks in accordance with Health and Safety Executive guidance.
- 5.7. The numeric values for each assessment are then added together to give an overall risk score. This overall risk score is then used to determine the appropriate management action required to reduce risks to a tolerable level.
- 5.8. The priority risk assessment undertaken will be used to develop an action plan for the remediation of ACM identified. The full methodology for the material and priority assessments is provided in the Asbestos Management Plan.
- 5.9. Risk assessment results are contained in the management surveys stored on the Property Maintenance asbestos management database and/or in PDF format.
- 5.10. Types of survey:
  - Management Surveys have limitations; they do not involve destructive sampling and will not necessarily identify all asbestos that may be present in a building.
  - Where works are proposed, the non-invasive nature of the management survey is not adequate to ensure that risks to those either undertaking the works or those potentially affected by the works are properly protected.
  - To achieve the required standard, it will normally be necessary to carry out Refurbishment and Demolition (R&D) surveys.
  - The extent to which it is necessary to invasively survey a building will depend on the types of works to be undertaken; minor works may only necessitate sampling of certain specified materials. Major demolition will necessitate a much more thorough survey.
  - R&D surveys will be commissioned from UKAS accredited companies.

## **6. Procedures for preventing the release of asbestos fibres**

### **6.1. Asbestos management plan**

6.1.1. When maintained in good condition and left undisturbed, Asbestos Containing Material (ACM) poses very little risk to human health. ACM identified as HIGH RISK will be removed. ACM identified as LOW RISK will be managed to ensure the risk remains low.

6.1.2. The Council’s Asbestos Management Plan is based on the following:

- The completion of Management surveys of ACMs in all common areas;
- Depending on the risk assessment the encapsulation or removal of ACMs in common areas;
- The routine inspection of ACMs in common areas;

- The completion of Refurbishment and Demolition surveys of ACMs in all void properties and where major works are planned;
- During the voids process high risk ACMs are removed. Where existing low risk suspected or ACMs are in good condition and are not likely to be damaged, they will be left in place and appropriate warning labels are fixed on the item.
- Where a Refurbishment and Demolition survey has not been undertaken information will be cloned from an appropriate property on which the risk assessment will be based pending a full survey;
- The inspection of properties when undertaking other routine work e.g. routine maintenance inspections;
- Details of asbestos in homes will be made available to tenants; and
- The increase in the completion of Refurbishment and Demolition surveys and the removal of ACM will be monitored and reviewed from data recorded on the Asbestos Register annually.

## **6.2. Informing tenderers and contractors**

- 6.2.1. Where known, the Council has a duty to provide information on known hazards including asbestos survey information as part of tender documents and subsequent ordering of works.
- 6.2.2. Where the works are to be undertaken as part of a CDM project, information on ACM will be included in the Pre-Tender Health and Safety information. Other consultants engaged in the project may also require copies of the survey in order to consider design alternatives that could remove the need to work on the ACM.
- 6.2.3. Where the management of asbestos forms part of a larger piece of work, the contractor undertaking the works is to co-ordinate all activities.
- 6.2.4. Where ACM is being removed as a separate project this will be undertaken by a specialist asbestos contractor.
- 6.2.5. Not all ACMs require the appointment of a specialist contractor and staff must ensure they are conversant with the Control of Asbestos Regulations 2012 which determines when a specialist contractor is to be appointed and when a general contractor, with appropriate training, should undertake the removal of ACMs.
- 6.2.6. On completion of the works the CDM Co-Ordinator must provide the Health and Safety File for the project to the Project Officer responsible for the contract. All information relating to works on asbestos must be provided within this file which will be used to update the Asbestos Database.

## **6.3. Maintenance Works**

- 6.3.1. Where works are ordered on an individual property, either as responsive maintenance, voids or planned works, Contractors will be advised (if known) of the existence of ACMs in the building, its location and type. Where a contractor has access to the asbestos database, they will be able to check the information first-hand. In the unlikely event that there is no information, the Project Officer will have a survey undertaken. In emergency situations, if the work must proceed without the survey results, it will be assumed that ACMs are present in the building and the works undertaken accordingly.
- 6.3.2. Where information is provided it is the responsibility of the contractor to use this information in the planning of the works.
- 6.3.3. Before any work is undertaken, the contractor must ensure their operative(s) are trained, competent to carry out the work and briefed on the Method Statement for the work.

- 6.3.4. If no ACM is identified, then the works can progress in the normal way under the standard risk assessments and method statements.
- 6.3.5. Suitably trained and competent contractors may remove certain asbestos products as non-licensed works in accordance with the task essentials guide HSG210.
- 6.3.6. The appointed contractor will assess the works and submit an ASB5 notification to the HSE 14 days before commencing the works; in addition, they must submit a plan of works in accordance with HSG247 for agreement with the Project Officer.
- The Council will only undertake the removal of licensed ACMs in un-occupied premises or in controlled conditions.
- 6.3.7. On completion of the works the contractor will submit all relevant documents to the Project Officer, including the four-stage air clearance certificate, the waste consignment notice and re-occupation certificate. This information must be stored on the Asbestos database.
- 6.3.8. All air monitoring is to be carried out by UKAS accredited organisations and separate companies will be employed to carry out asbestos removal and air testing.

#### **6.4. Emergency procedures**

- 6.4.1. On occasion, emergencies may arise e.g. because of events such as burst pipes, failure of equipment, etc. or discovery of damaged asbestos materials during surveys or routine inspection. It is important that, in attempting to rectify faults, the requirements of this Policy are not overlooked.
- 6.4.2. If it is suspected that an ACM has been disturbed and that asbestos fibres have accidentally been released, the following action will be taken immediately:
- Stop the activity;
  - Evacuate the area immediately without causing unnecessary alarm;
  - Seal the room/area, close the door, lock it and display;
  - DO NOT ENTER signs. Cordon off / secure the area until a full assessment has been completed;
  - Report the incident immediately to the Operational Assets and Compliance Team and Councils Health and Safety Officer;
  - If out of hours, contact the Councils out of hours emergency team;
  - Inform staff and keep persons from area;
  - Record if possible, the names of all persons potentially affected;
  - Get site asbestos report/plan ready to view;
  - DO NOT attempt to clear up suspect materials or collect samples; and
  - DO NOT re-enter the areas to collect equipment, items, documents or belongings.
- 6.4.3. Before any emergency work is undertaken the relevant surveys and risk assessments must be undertaken.
- 6.4.4. Should a request for emergency work be made, as soon as such a report is received, the relevant asbestos information on the Asbestos Register database (if available) should be consulted as soon as is practicable to see if any ACM is present in the works area. If the record proves that there is no ACM present, then the works should be undertaken in the normal way.
- 6.4.5. If the records are silent or identify the presence of ACM in the area, direction should be given to secure and prohibit access to the area until a plan of action is agreed.
- 6.4.6. In response to an emergency, a specialist asbestos contractor may be directed to carry out any necessary sampling/air clearance monitoring. The contractor will, in

many instances, be able to provide an opinion as to whether the material is or is not asbestos and the scope of any remedial work.

- 6.4.7. The Operational Assets and Compliance Team must be consulted immediately to determine the appropriate action.
- 6.4.8. If the works are notifiable and the area is deemed business critical, a waiver may be applied for to reduce the 14-day notification. This decision will only be taken in the most extreme of cases (e.g. where there would be a serious risk to health or to critical business delivery) and would require the approval of the Responsible Person.
- 6.4.9. Subject to a waiver being granted (or the 14-day notification period being satisfied), the works will then be undertaken in accordance with this Policy.

## **7. Identification of suspect material – damaged disturbed or previously unidentified**

- 7.1. It is the responsibility of all staff to report to the Asbestos Co-ordinator if they suspect that disturbed or damaged asbestos containing materials may be present in a building owned or occupied by the Council. In a case where an accessible material is suspected of containing asbestos, and where this material may reasonably become disturbed, this would also apply.
- 7.2. In such cases, an external consultant having UKAS (United Kingdom Accreditation Service) accreditation for asbestos sampling and analysis, will be contacted to carry out identification.
- 7.3. If asbestos is identified within the sample, advice will be obtained from a competent consultant on the appropriate course of action.
- 7.4. Where damage to any material known to contain asbestos has taken place and is likely to give rise to airborne respirable fibre release, the Asbestos Co-ordinator will arrange for isolation of the area pending an investigation. The Asbestos Co-ordinator will arrange for air monitoring tests (measurement of airborne fibre concentrations) to be carried out and sampling and analysis will be carried out by an independent UKAS accredited organisation to determine the level of any potential contamination, or to provide reassurance that unacceptable contamination has not occurred.
- 7.5. Details of air test results will be made available for inspection and record purposes.
- 7.6. Remedial action will be required when airborne fibre levels exceed 0.01 f/cc. The nature of the remedial work must be agreed with the Asbestos Co-ordinator.
- 7.7. When remedial action becomes necessary after exposure, the relevant facts may have to be reported to the HSE in accordance with the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR). (Advice may be sought from a competent Asbestos Consultant to determine whether the incident is in fact RIDDOR reportable.)
- 7.8. The Asbestos Coordinator when reporting any incident that falls under the RIDDOR regulations is to immediately inform and liaising with the Councils Health and Safety Officer.

## **8. Asbestos surveys and management plans**

### **8.1. Normal Occupancy of Premises**

- 8.1.1. Where premises and common areas of housing stock were built or renovated prior to 2000, an Asbestos Management Survey programme will be carried out by a competent UKAS accredited asbestos management consultancy. (HSE expects that no asbestos containing materials would be in use from 2000.)
- 8.1.2. The surveyor and the Council should jointly determine an appropriate strategy to cost-effectively assess relevant premises, taking account of the permissibility of 'representative' surveying across properties of the same archetype and construction date.
- 8.1.3. Current legislation does not subject 'domestic dwellings' to the requirement for Asbestos Management Surveys (although Refurbishment and Demolition Surveys are required when the property becomes a 'place of work' – see below).
- 8.1.4. The findings of all Management and Refurbishment and Demolition Surveys undertaken will be used to update the Asbestos Register with all asbestos or suspected asbestos containing materials (including their location and condition along with details on how best to manage / remediate the material) in all Council properties.
- 8.1.5. An asbestos management plan will be developed and implemented, ensuring that all asbestos containing materials are properly managed. This will include procedures for re-inspecting materials and carrying out remedial works where necessary.
- 8.1.6. The Asbestos Co-ordinator will be responsible for maintaining the Asbestos Register, organising surveys and re-inspections.

## **8.2. Prior to Work on Premises**

- 8.2.1. Prior to any work being carried out on the fabric of (pre-2000) buildings, the asbestos register will be interrogated to determine whether asbestos may be encountered and appropriate precautions (including the use of HSE licensed contractors where necessary) will be taken.
- 8.2.2. Prior to any refurbishment, demolition or repair works on building fabric, which is not known to be asbestos free, a competent UKAS accredited asbestos management consultancy will be commissioned to carry out a 'Refurbishment and Demolition' (i.e. intrusive) asbestos survey of the area to be worked upon.
- 8.2.3. The surveyor and the Council should jointly determine an appropriate plan to cost-effectively assess relevant premises, taking account of the permissibility of 'representative' surveying across properties of the same archetype and construction date.
- 8.2.4. Prior to works starting, the information obtained from Management and Refurbishment and Demolition Surveys will be issued and discussed with the proposed works contractor to ensure that ACMs will not be disturbed by their works.
- 8.2.5. In the event that works would have the potential to disturb ACMs, appropriate measures will be taken, including the prior removal of ACMs, amendments to work programme, etc.
- 8.2.6. Records of all surveys and discussions with contractors will be retained in the project files to demonstrate that asbestos was properly considered, and appropriate actions taken to prevent disturbance and exposure.
- 8.2.7. The details of all survey information must be uploaded on to the Asbestos Register database.

## **9. Asbestos abatement works**

- 9.1. If the works are “licensable” the contractor will submit a 14-day notification to the HSE detailing their plan of work and the dates that the work will be undertaken. The contractor will provide risk assessments and method statements for approval by the Project Officer.
- 9.2. Suitably trained and competent contractors may remove certain asbestos products as non-licensed works in accordance with the task essentials guide HSG210.
- 9.3. All licensed asbestos removal works must be notified to the HSE and only undertaken by licensed asbestos removal contractors. The contractor will assess the works and submit an ASB5 notification to the HSE 14-days before commencing the works; in addition, they must submit a risk assessment, method statement and a plan of works for approval by the Project Officer in accordance with HSG247.
- 9.4. On completion of the works the contractor will forward all the relevant documents to the Project Officer including the four-stage air clearance certificate, the waste consignment notice and re-occupation certificate.
- 9.5. All survey information must be uploaded on to the Asbestos Register database.
- 9.6. All air monitoring is to be carried out by UKAS accredited organisations and separate companies will be employed to carry out asbestos removal and air testing.

## **10. Review and monitoring**

- 10.1. The requirements of this Policy will be monitored by way of a risk-prioritised process of auditing.
- 10.2. The training and responsibilities of individuals will be monitored by the Council through its management and appraisal processes.
- 10.3. Where necessary the Council will take appropriate action to ensure that this Policy is upheld.
- 10.4. This Policy will be reviewed annually by the Service Manager – Property Maintenance or if:
  - New legislation or guidance is published, or existing legislation or guidance is updated;
  - Research, monitoring or auditing suggests that a review may be required; and/or
  - Incident investigation suggests that a review may be required.
- 10.5. A formal review of this Policy will be undertaken in consultation with the Epping Forest Tenants and Leaseholders’ Panel in five years.

## **11. Appendices**

- 11.1. Tenants Asbestos in the Home Booklet.
- 11.2. Asbestos Management Plan.

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## **Appendix 11.2 Asbestos Management Plan;**

When maintained in good condition and left undisturbed, Asbestos Containing Material (ACM) poses very little risk to human health. ACM identified as HIGH RISK will be removed. ACM identified as LOW RISK will be managed to ensure the risk remains low.

### **The priorities of the Asbestos Management Plan include;**

- Identify the location and condition of asbestos or suspected asbestos containing material on Council owned and managed sites;
  - Undertake Management surveys identifying ACMs in all common areas of Council owned and managed blocks of flats;
    - Management surveys are undertaken in all common areas of Council owned and managed blocks of flats bi-annually;
    - any asbestos containing material identified in a poor or dangerous condition remedial or removal action is immediately undertaken;
    - during the voids process where existing low risk suspected or ACMs are in good condition and are not likely to be damaged, they will be left in place and appropriate warning labels are fixed on the item;
  - Undertake Refurbishment and Demolition surveys identifying asbestos and suspected ACMs in all void and occupied properties where major works are planned;
- Record details of the location and the condition of asbestos or suspected ACMs on Council owned and managed properties on the Asbestos Register;
- Manage, maintain and update the Asbestos Register;
- Circulate the updated Asbestos Register on a quarterly basis to Qualis Management and all of the Councils works contractors;
- Qualis Management and all of the Council works contractors on receipt of an HRP Works Order are to review the Asbestos Register and either;
  - Request a copy of the Refurbishment and Demolition Survey from the Operational Assets and Compliance Team prior to commencing any works;
  - Commission and ensure a Refurbishment and Demolition Survey is carried out on the property by UKAS accredited organisation prior to commencing any works.
- Copies of all Refurbishment and Demolition Surveys completed on Council properties are forwarded to Operational Assets and Compliance Team.
  - Removal action is taken on any confirmed asbestos containing material that is likely to be disturbed during the major works;
    - Copies of the consignment note on the disposal of asbestos containing material is forwarded to the Operational Assets and Compliance Team.
- The Refurbishment and Demolition Survey and any consignment notes that are issued are referenced and added to the Asbestos Register.

### **Asbestos Management Plan Targets;**

The targets of the Asbestos Management Plan include;

- Migrate the Asbestos Register and all Refurbishment and Demolition Surveys to a shared location as a Microsoft SharePoint file (currently being discussed with ICT);
- Migrate the Management surveys of ACMs in all common areas of Council owned and managed buildings and blocks of flats to a shared location as a Microsoft SharePoint file (currently being discussed with ICT);
- Continue undertaking and recording asbestos information obtained through Refurbishment and Demolition Surveys and Stock Condition Surveys carried out on Council properties;
- Continually reduce the number of cloned asbestos information on the Asbestos Register;
- Continue to remove all high-risk asbestos containing material identified on Council properties;



## Asbestos Register;

The Asbestos Register contains the location, detail and risk of suspected asbestos containing material found in 8116 Council owned, leasehold and sold properties.

This figure is in excess of the current number of Council owned properties, on the 28<sup>th</sup> August 2020, the Council owned 6375 HRA properties and 54 hostel accommodation bedsits, as the Council has a duty to maintain, record and provide asbestos information.

Information on asbestos containing material is collected from 3-sources;

1. a Refurbishment and Demolition surveys;
  - a. These are intrusive surveys and cause damage to building elements;
  - b. Refurbishment and Demolition surveys are an accurate source of information on the location of suspected and asbestos containing material. These surveys will identify the location of suspected and asbestos containing material that may be cloaked or hidden from view.
2. during a Stock Condition Survey (SCS); and;
  - a. These surveys are a visual inspection of the property only and are not intrusive;
  - b. SCS data is an accurate source of information on the location of suspected and asbestos containing material. However, SCSs are limited in that a SCS will **not** identify the location of suspected and asbestos containing material that may be cloaked, boxed in and decorated or hidden from view
3. asbestos data cloned from similar property architypes;
  - a. Cloned data is the least reliable source of information which has been based on the location of suspected and asbestos containing material identified from similar property architypes.

The table below shows how survey information on suspected and asbestos containing material in Council owned properties has been collected and included on the Asbestos Register.

Location.	Total Number of Surveys.	Report Type.
Microsoft SharePoint Files; Asbestos Register; Asbestos Surveys;	4150	Refurbishment and Demolition Asbestos Survey.
	1096	Stock Condition Survey.
	1084	Cloned Asbestos Data.
	99	*New Build Properties
	6429	Total

\*Asbestos report is not required as no asbestos containing material used in construction.

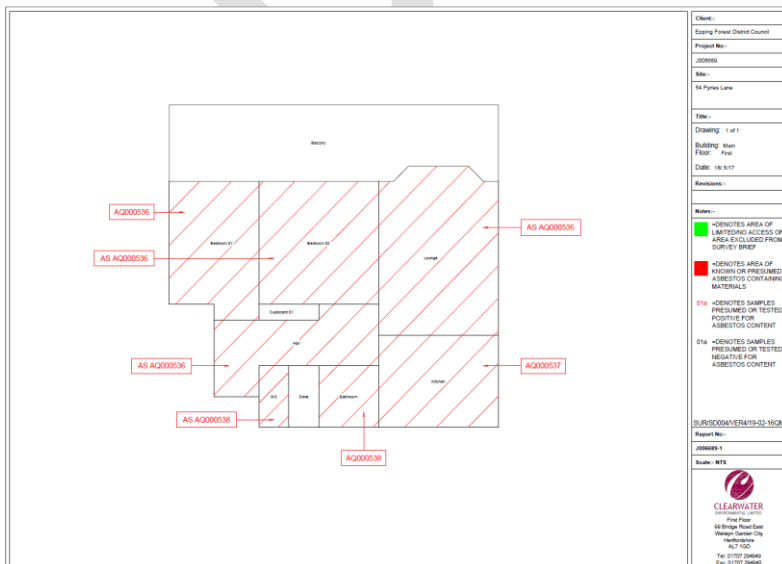
Asbestos data is recorded and referenced against each property, this allows property specific suspected and asbestos containing material information to be available to Qualis Management, staff, external contractors, tenants of Council properties and other persons who may potentially disturb or damage asbestos containing material when undertaking work in a Council property.

The table below shows the information and detail collected through the 3-survey types on suspected and asbestos containing material and how the information is shown on the Asbestos Register for each Council property.

Property Address.	Survey Type.	1 <sup>st</sup> Location, Description and Condition	Risk Factor	2 <sup>nd</sup> Location, Description and Condition	Risk Factor	3 <sup>rd</sup> Location, Description and Condition	Risk Factor	1 <sup>st</sup> Location, Description and Condition	Risk Factor	2 <sup>nd</sup> Location, Description and Condition	Risk Factor
		<b>Internal Location</b>		<b>Internal Location</b>		<b>Internal Location</b>		<b>External Location</b>		<b>External Location</b>	
Property Details	SCS	Suspect asbestos containing cistern to bathroom, amosite.	1	Suspect asbestos containing textured 'Artex' coating to all ceilings, chrysotile.	1	*NADIS, kitchen sink pad.	0	Suspect asbestos cement soffit board to main roof	1	Suspect asbestos cement profile roof sheet material to outhouse (Note: fragile roof covering).	1
Property Details		Asbestos containing toilet cistern to bathroom, amosite. Cloned from 38	1	Asbestos cement cold water storage tank in loft, amosite chrysotile. Cloned from 8	1	Suspect asbestos containing vinyl floor-tiles, plus adhesive, chrysotile. Cloned from 92	1	Suspect asbestos cement soffit board to main roof Cloned from 46	1	Suspect asbestos cement under-cloak (soffit) to gable end, chrysotile. Cloned from 92	1
Property Details	R&D	Full Refurbishment and Demolition Report Available									

\*No Asbestos Detected In Sample  
Asbestos Register Survey Examples.

Management and Refurbishment Asbestos Surveys provide detailed asbestos information which generally includes floor plans of the property indicating the location of asbestos containing material. The floor plans are then annotated and referenced with the location of all suspected and asbestos containing material found on the property.



An example site floor plan of a Council property and the details of all suspected and asbestos containing material are included in the Management and Refurbishment Asbestos Survey;

Example Floor Plan

From the example floor plan the Management and Refurbishment Asbestos Survey includes;

**Location Element Comments;**

- Bedroom 01 Floor Tile - Thermoplastic Confirmed Asbestos;
- Bedroom 02 Floor Tile - Thermoplastic Presumed Asbestos;
- Lounge Floor Tile - Thermoplastic Presumed Asbestos;
- Kitchen Floor Tile - Thermoplastic Confirmed Asbestos;
- Bathroom Floor Tile - Thermoplastic Confirmed Asbestos;
- WC Floor Tile - Thermoplastic Presumed Asbestos;
- Hall Floor Tile - Thermoplastic Presumed Asbestos;

**Communication Plan;**


Rather than circulating the updated Asbestos Register on a quarterly basis to Qualis Management and all of the Councils works contractors on an individual basis making this and other information on asbestos available through a shared location has been identified as a target in the Asbestos Management Plan.

The Asbestos Management Plan includes the migration of the Asbestos Register and all Refurbishment and Demolition Surveys to a shared location as a Microsoft SharePoint file.

The Microsoft SharePoint file (currently being discussed with ICT) will be available to Qualis Management the Councils housing repairs contractor, all employees, contractors, subcontractors, consultants and Council staff to view the Asbestos Register and allow read only access all of the Councils asbestos information.




The Asbestos Register file will contain the up to date Asbestos Register with the information and detail collected through the 3-survey types on suspected and asbestos containing material on a property by property basis.

**Level 1 Asbestos Register;**

 Asbestos Register;

**Level 2 Asbestos Reports;**

The Asbestos Register contains links to all the Refurbishment and Demolition Survey Reports completed on Council properties which are stored in 432 Level 2 files referenced as the Street Name and in alphabetical order.

-  Properties in Abbots Drive;
-  Properties in Acres Avenue;
-  Properties in Albert Road; stored in alphabetical order through to Yew Close;

**Level 3 Refurbishment and Demolition Survey Reports;**

The properties Refurbishment and Demolition Survey Report is stored as a Level 3 file and is referenced as the property number;

 The properties Refurbishment and Demolition Survey Report;

The Council's Asbestos Management Plan is also based on the completion of Management surveys of ACMs in all common areas of Council owned and managed buildings and blocks of flats.

The Microsoft SharePoint file (currently being discussed with ICT) will be available to Qualis Management the Councils housing repairs contractor, all employees, contractors, subcontractors, consultants and Council staff.

The Asbestos Location Record Reports file will contain the latest version of the Asbestos Location Record Report carried out on all Council owned and managed buildings and blocks of flats.

**Level 1 Asbestos Location Record Reports;**

 Asbestos Location Record Reports;




**Level 2 Property Address;**

The Asbestos Location Record Reports file contains 6 Level 2 files referenced as the Blocks Street Name with blocks stored in the following alphabetical groups;

-  Property Address A-D;
-  Property Address E-I;
-  Property Address J-M;
-  Property Address N-Q;
-  Property Address R-U;
-  Property Address V-Z;

**Level 3 Individual Block;**

The blocks individual Asbestos Location Record Report is stored as a Level 3 PDF and is referenced as the blocks number and alphabetical street name;

-  1-8 Beech Court; Asbestos Record Sheet;
-  1-11 Brooker Road; Asbestos Record Sheet;
-  1-15 Davis Court; Asbestos Record Sheet; all stored in alphabetical groups and block number through to block 336-350 Willingale Road.

## Version Control

DRAFT

Version no.	Date	Details of changes included in update	Author
0.1	Sept 2020	Final draft	Team Manager – Operational Assets and Compliance

Housing and Property Service  
Epping Forest District Council  
Civic Offices, High Street, Epping, Essex CM16 4BZ

[www.eppingforestdc.gov.uk/housing](http://www.eppingforestdc.gov.uk/housing)

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