



Name of Policy	Asbestos Management Policy
Responsible Officer	Asset Management Officer
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Section	Asset Management

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1.0 Introduction

1.1 Kingsridge Cleddans Housing Association is committed to ensuring that our buildings are retained to their highest possible level and in accordance with current legislation. This policy will outline the measures taken to reduce the asbestos-related risks to as low a level as is practicable in accordance with legal requirements and best practice.

2.0 Legislation and Regulations

- The Health & Safety at Work Act 1974
- The Asbestos Licensing Regulations 1983
- The Control of Asbestos at work Regulations 1987
- The Management of Health & Safety at Work Regulations 1992
- The Construction Design and Management Regulations 1994
- The Control of Asbestos at Work Regulations 2002
- The Construction Design and Management Regulations 2007
- The Control of Asbestos Regulations 2012
- The Construction Design and Management Regulations 2015
- INDG 223 A Short Guide to Managing Asbestos in Premises
- HSG264 Asbestos: A survey guide

3.0 Asbestos

3.1 It has been illegal to use asbestos in the construction or refurbishment of buildings since 1999 (the use of brown and blue asbestos was banned in 1985). The construction dates for the construction or refurbishment of our properties are outlined in the table below.

Phase	Addresses	Number of properties	Year of construction	Asbestos potential
Inchfad phase 1	87 – 133 Inchfad Drive	23	1993 New Build	Yes (low)
Inchfad Phase 2	90 – 124 Inchfad Drive 7 – 18 Fettercairn Avenue 1 – 8 Inchfad Place	32	1997 New Build	Yes (low)
Inchfad Phase 3	68 – 88 Inchfad Drive	20	1999	Yes

	1 – 5 Fettercairn Avenue 9 – 15 Inchfad Place		New Build	(low)
Inchfad Phase 4	1 – 61 Inchfad Crescent 77 – 85 Inchfad Drive	42	2001 New Build	No
Ladyloan Phase 1	8 – 28 Ladyloan Avenue 1 – 17 Ladyloan Court 5 – 26 Ladyloan Gardens	31	1997 New Build	Yes (low)
Ladyloan Phase 2	2 – 24 Ladyloan Grove 9A – 53 Lochgoin Avenue	38	2005 New Build	No
Achamore/Lochgoin	80 – 96 Achamore Road 1A – 7B Ladyloan Ave 1 – 7 Lochgoin Avenue 1 – 15 Lochgoin Gardens	34	2004 New Build	No
Cleddans Court	2 – 52 Fasque Place 2 – 38 Ladyloan Place	45	1996 New Build	No
Lochgoin Avenue Rehab	37 – 45 Lochgoin Avenue	27	1993	Yes (low)

3.2 The presence of an asbestos-containing material in itself does not constitute a danger. However, there is a potential risk to health if such material is disturbed and damaged. An isolated accidental exposure to asbestos fibres for a short duration is extremely unlikely to result in the development of asbestos-related diseases. However, regular exposure – even at relatively low levels – can present a risk. As well as people employed in the building trades, inadvertent exposure (and consequent risk) can occur in other groups of people e.g.

installers of burglar alarms, smoke detectors, etc. Maintenance and repair contracts will also take place in the future, and it is important, therefore, to have in place a management system which minimises the potential for exposure to asbestos.

- 3.3 The majority of our properties (179) (61.3%) were constructed between 1999 – 2006 and these have a very low risk of asbestos being present as they were constructed after asbestos was banned from the Building Industry in 1999.
- 3.4 The properties constructed or refurbished between 1993 and 1997 (113) (38.7%) are the properties that are more likely to be at risk.
- 3.5 Since the construction of our properties, we have kept and maintained an Asbestos Register. This details when an inspection was carried out, and if any Asbestos was found.
- 3.6 23 properties have been surveyed between 2013 and 2022. These properties are across all of our stock, including those properties constructed between 1993 and 1997.
- 3.7 Of these surveys, there was not a single finding of Asbestos. As this included numerous properties from each construction phase, we believe it is reasonable to conclude that Asbestos has not been used in the construction of any KCHA property.
- 3.8 In June 2014, we conducted a survey of the KCHA office, which concluded that no asbestos was used in the construction of the office.

4.0 Asbestos Management Plan

4.1 The Association's Management Plan on asbestos is to:

- ensure the prevention of exposure to risks associated with asbestos-containing materials.
- ensure that any asbestos-containing materials that may be present in any of its buildings are maintained in a condition to prevent the possibility of any harm to health occurring.
- promote awareness of the risks from asbestos-containing materials and the Management Procedures through training and induction of relevant staff. Key staff involved in the delivery of this Policy will receive annual re-training.
- provide adequate resources to ensure the provision of appropriate information, instruction, and training.
- 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.
- ensure that an appropriate asbestos surveying process remains in place, taking account of the need for Asbestos Management, Refurbishment

and Demolition Surveys in accordance with current legislation and maintain an Asbestos Register.

- implement an effective asbestos management strategy in order that appropriate measures such as encapsulation, labelling, inspection, working with, or removal of, the material can be undertaken.
- ensure that an appropriate system is installed, maintained, and implemented for the management of all asbestos containing materials identified in the Register. Such a system is to be capable of recording the risk, the needs, and priorities for treatment and/or removal.
- 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.
- ensure that information regarding the presence of asbestos is contained in tender documentation as may be appropriate.
- ensure Licensed Contractors and/or Sub Contractors carry out ALL Asbestos Major Works and Competent Contractors carry out all Asbestos Minor Works.
- ensure all Non – Licensed Contractors carrying out Asbestos Minor Works are trained in safe working procedures and have appropriate insurance cover for the work being carried out.
- ensure that relevant staff of the Association and contractors (as identified by a training needs analysis) have appropriate training in this Policy and Procedures.
- regularly review the Asbestos Management Policy and Procedures.

5.0 Management of Asbestos

5.1 The Association's Director will be the responsible person for instructing asbestos surveys, maintaining and updating the register and informing contractors about the presence of asbestos where found. The Director will also ensure that asbestos contractors are qualified and registered for carrying out this type of work.

5.2 The Health and Safety Executive provides a duty for the management of Asbestos. This includes maintaining an Asbestos Register.

6.0 Asbestos Surveys

6.1 The purpose of an asbestos survey is to:

- Locate and record the location and extent of any presumed or known asbestos containing materials (ACM's).
- Inspect and record information on the accessibility, condition and surface treatment of any presumed or known ACM's.
- Determine and record the asbestos type, either by collecting samples of suspect materials for laboratory identification or by making an assumption based upon product type and appearance.

6.2 Following the surveys that have been carried out to date, we have reasonably concluded that there is no asbestos within our properties.

6.3 Future surveys will only be instructed if we are led to believe that this is incorrect.

7.0 Asbestos Register

- 7.1 The Association has and maintains an Asbestos register. Access to the register will be available to contractors on request.
- 7.2 The register will be held electronically with the Asset Management Section.
- 7.3 The Register contains information on different property types in the undernoted pre-1999 construction phases.

8.0 Asbestos Management Plan Review

- 8.1 All of our properties were constructed or refurbished between 1993 – 2006 and the use of brown and blue asbestos was banned in 1985. 5 phases were constructed between 1993 – 1999 and the use of white asbestos was banned in 1999.
- 8.2 Following the surveys and the fact that we have to-date discovered no sign of the use of Asbestos this policy is detailed under the assumption that there is none within our properties. Should this change, this policy and plan shall be reviewed.

9.0 Asbestos Roles

- 9.1 Whilst the Director for the Association will have responsibility for the overall asbestos management system, the Association will define and allocate roles and responsibilities to ensure the fulfilment of the policy and procedures on a practical level.

10.0 Prohibition on Staff Handling Asbestos

- 10.1 Unless properly trained to do so, no Association staff will be permitted to handle or work on ACM's
- 10.2 In the event that the Association opts to handle ACM's (e.g. for the purposes of sampling), appropriate training will be provided, insurances obtained and these procedures updated to reflect the acceptable process.

11.0 Identification of Suspect Material – Damaged, Disturbed or Previously Unidentified

- 11.1 It is the responsibility of all staff to report to the Director if they suspect that disturbed or damaged asbestos containing materials may be present in a building owned or occupied by the Association. In a case where an accessible material is suspected of containing asbestos, and where this material may reasonably become disturbed; this would also apply.
- 11.2 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.

If asbestos is identified within the sample, advice will be obtained from a competent consultant on the appropriate course of action.

11.3 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. S/he 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 Association to determine the level of any potential contamination, or to provide reassurance that unacceptable contamination has not occurred.

- Details of air test results will be made available for inspection and record purposes.
- 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 Director.
- 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.)

13.0 Asbestos Surveys – Prior to Work on Premises

13.1 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 or Demolition' (i.e., intrusive) asbestos survey of the area to be worked upon. The surveyor and the Association 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.

13.2 Prior to works starting, the information obtained from Refurbishment/Demolition Surveys will be discussed with the proposed works contractor (or internal direct works staff) to ensure that ACM's will not be disturbed by their works. If works would have the potential to disturb ACM's, appropriate measures will be taken, including the prior removal of ACM's, amendments to work programme, etc.

13.3 Records of all surveys and discussions with contractors will be retained in the Job File to demonstrate that asbestos was properly considered and appropriate actions taken to prevent disturbance and exposure.

14.0 Work with Asbestos Materials

14.1 Work likely to disturb or remove asbestos must be carried out by an HSE licensed asbestos removal contractor and notified to the HSE 14 days prior to

commencement. However, the Control of Asbestos Regulations 2012 does allow work with certain lower risk asbestos containing materials (e.g., asbestos cement and asbestos textured coatings) to be carried out by non-licensed personnel and without notification to the HSE. The three categories of asbestos work are:

- Major Works: Licensed works – 14 day notification and licenced contract (highest risk work)
- Minor Works: Notifiable non-licensed works – notification before works start and competent (non-licensed) contractor
- Minor Works: Non-notifiable non-licensed works – no notification and competent (non-licensed contractor)

14.3 Where any doubts exist over the correct classification or scope of asbestos works, advice will be sought from a competent UKAS accredited asbestos management consultancy prior to any works being carried out on asbestos containing materials. The Association may also appoint a competent Asbestos Project Management consultancy to scope, specify, tender and project manage asbestos contracts.

14.4 Where work does not require to be carried out by licensed contractors (i.e. Minor Works) it will, nevertheless, be undertaken in a safe manner, by appropriately trained personnel, reducing the generation of airborne dusts to as low a level as is reasonably practicable. All method statements and risk assessments for such work will be screened by a competent person prior to work commencing.

14.5 Where licensed contractors are required to carry out asbestos works, the following documentation will be requested from the contractor prior to commissioning, and copies kept in the job file:
current asbestos licence check on HSE website

- insurance certificate indicating the insured is covered for asbestos work
- a representative sample of medical examination certificates (conducted by an Employment Medical Advisory Service registered doctor) for personnel who will work on the job
- a representative sample of training records for all personnel who will work on the job (asbestos management and handling courses), usually provided by a United Kingdom Asbestos Training Association (UKATA) member
- where applicable, notification of the job to the HSE 14 days prior to commencement
- method statement and risk assessment for the job (Plan of Work)

14.6 At the conclusion of all asbestos works (unless included within an Asbestos Project Management package), the Association will directly appoint a UKAS-accredited Asbestos Analyst to carry out the required level of inspection and test. For licensed works this will include a '4-stage clearance test' and for minor

works this will include a visual inspection and reassurance air test. Care will be taken to ensure this is EXCLUDED from the contractor's initial proposal and price.

16.0 Equality and Diversity

16.1 As a service provider and employer, we recognise the requirements of the Equality Act 2010, oppose any form of discrimination and will treat all customers, internal and external, with dignity and respect. We recognise diversity and will ensure that all our actions ensure accessibility and reduce barriers to employment and the services we provide.