

# Asbestos Management Policy



**Our Assets**

Warrington Housing Association

## INTRODUCTION

Warrington Housing Association (WHA) is a community based not-for-profit organisation located in the borough of Warrington.

WHA is responsible for the maintenance and repairs to its homes and other non-domestic (communal) buildings, many of which will hold asbestos containing materials. As such WHA has a legal duty to manage asbestos in its homes and buildings and this must be done in accordance with the Control of Asbestos Regulations (CAR) 2012.

## SCOPE OF POLICY

WHA must establish a policy which meets the requirements of the Control of Asbestos Regulations 2012.

WHA will report compliance with asbestos legislation to the Senior Management Team (SMT) and Board.

The policy is relevant to all WHA employees, tenants, contractors and other person's or other stakeholders who may work on, occupy, visit, or use its premises, or who may be affected by its activities or services.

The policy is also relevant for maintaining a safe environment for all tenants and employees within all WHA non-domestic properties, where the organisation has an obligation to do so.

## LEGISLATION

Other legislation relating to Asbestos is detailed in the following documents

- The Health and Safety at Work Etc. Act 1974:
- The Management of Health and Safety at work Regulations 1999
- Workplace (Health, Safety and Welfare) Regulations 1992:
- The Control of Asbestos Regulations 2012:
- The Control of Substances Hazardous to Health Regulations (COSHH) 2002 (as amended):
- The Hazardous Waste (England and Wales) Regulations 2005:
- The Construction (Design & Management) Regulations 2015:
- HSG 264 Asbestos: The Survey Guide
- Approved Code of Practice L143 Managing and Working with Asbestos (2<sup>nd</sup> Edition)

## OBLIGATIONS

The duty to manage asbestos is included in the Control of Asbestos Regulations (CAR) 2012.

The application of this policy will also ensure compliance with the Regulator for Social Housing's regulatory framework and consumer standards (Home Standard) for social housing in England.

In order to be compliant WHA must provide assurance that measures are in place to identify, manage and/or mitigate risk associated with asbestos located within communal areas,

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commercial properties and offices and to check the condition of these asbestos containing materials (ACMs) on a regular basis.

WHA will keep an up-to-date record of the location and condition of the asbestos containing materials or presumed asbestos containing materials in the homes and buildings owned and managed by WHA.

WHA will assess the risk from the asbestos containing materials found and record the information on the asbestos register, taking steps needed to put the asbestos management plan in to action.

If there is asbestos in the homes and buildings owned and managed by WHA (or assessing if asbestos containing materials are liable to be present and making presumption that materials contain asbestos, unless the organisation has strong evidence that they do not), identifying its location and identifying what condition it is in. If the home or building was built prior to the year 2000 WHA will assume asbestos is present. If the home or building was built after the year 2000 asbestos is unlikely to be present and no further action will be required.

In advance of any planned works taking place in domestic properties WHA will ensure that an asbestos survey is undertaken, or alternatively that an adequate amount of archetype information is available to the contractor.

WHA will provide online access to information on the location and condition of the asbestos containing materials to anyone who is liable to work on or disturb these materials.

## STATEMENT OF INTENT

WHA is a Duty Holder as defined within Regulation 4 of the Control of Asbestos Regulations 2012 (CAR 2012).

WHA recognises that the main hazard in relation to asbestos is the non-identification of ACM's and as such will protect those persons potentially exposed to asbestos as far as is reasonably practical by minimising the exposure through the use of appropriate control measures and working methods.

WHA accepts that ACM's are likely to be present in many of its properties built prior to the year 2000 and will therefore manage these properties accordingly.

WHA will continue creating and regularly updating the asbestos register for all WHA properties.

WHA will ensure only contractors who are UKAS accredited, are to undertake asbestos management surveys. Only licensed asbestos removal contractors will be instructed to carry out remediation works.

Domestic properties will include all void properties where repairs or maintenance work is taking place and is likely to disturb any ACM. In advance of any works taking place WHA will ensure that

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an asbestos survey is undertaken, or alternatively that an adequate amount of archetype information is available to the contractor.

WHA will undertake Refurbishment and Demolition (R&D) surveys to domestic and non-domestic properties, prior to planned maintenance works taking place to areas within the property likely to be disturbed as part of the proposed works, in these instances the surveyor will also undertake a management survey to the remainder of the property as part of the same R&D survey.

WHA will ensure employees and contractors have adequate asbestos survey information to enable them to manage and/or work safely with asbestos.

WHA will have a robust process in place to gain access to properties where tenant vulnerability issues are known or identified whilst ensuring the organisation can gain timely access to any property in order to be compliant with this policy and safeguard the wellbeing of the tenant.

### **NON-DOMESTIC STOCK**

WHA will ensure that all non-domestic (communal) and other properties in ownership or management have an initial asbestos management survey carried out and will comply with the CAR 2012 legislation.

All non-domestic (communal) and other properties will have an annual re inspection survey. Re-inspection dates may change following the re-categorisation of a property or a building. WHA have asbestos data on 100% of their non-domestic stock that have communal areas. WHA will not need to re-inspect any non-domestic (communal) or other properties built after the year 2000, or where the initial asbestos management survey confirms that there are no asbestos containing materials.

WHA will review existing asbestos management survey information prior to carrying out any repairs or planned maintenance works which may involve working on, or adjacent to, any asbestos containing materials within non-domestic property.

### **DOMESTIC STOCK**

WHA will review the existing asbestos management survey information prior to any void repairs or planned maintenance works. It is not reasonably practical to have surveyed every property prior to any works undertaken. However, we aim to minimise the exposure through various methods until we have progressed archetypal information to make a risk-based assessment. All asbestos surveys and R&D surveys are accessible for all contractors and consultants via our on-line contractor access web-based portal.

Where there is no previous asbestos related information in respect of a domestic property which requires a survey ahead of void repairs, a management survey will be undertaken. If the void does not require intrusive repairs works, an asbestos survey is not required, unless we require a survey to progress the archetypal information.

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Once WHA has asbestos survey information on at least 20% properties that are similar in type in the same area and where this survey information is consistent (or exactly the same) then at this time this information can reasonably be assumed as accurate for those specific property types (an archetype). Anyone working in these properties should be made aware the asbestos information provided has been developed from a cloned report and these persons must hold current asbestos awareness training.

### **REFURBISHMENT WORK**

Prior to any planned maintenance work WHA will undertake intrusive refurbishment and demolition surveys (R&D) to domestic and non-domestic properties where works will be taking place and are likely to be disturbed as part of that work. WHA will also undertake a management survey to the remainder of the property.

### **FOLLOW UP WORK**

WHA will ensure there is a robust process in place for the management of any follow-up works required following the completion of an asbestos management or R&D survey.

WHA will ensure any asbestos containing material found to be damaged will either be made safe or remove the damaged ACM or assumed ACM at the earliest opportunity.

Where a material is uncovered, and it is assumed to be ACM, a sample will be taken and analysed in order to enable remedial works where required.

Where asbestos is positively identified WHA will appoint a suitably qualified competent contractor who will issue a Risk Assessment and detailed programme of works.

Where removal, sealing or encapsulation is recommended, all asbestos removal and encapsulation will be carried out by a specialist contractor who is licensed by the Health and Safety Executive and monitored via a third party, UKAS accredited Asbestos Consultancy for licensed removal works

All works will be undertaken in accordance with the CAR Regulation 2012, regulation 7.

### **RECORD KEEPING**

WHA will establish and maintain a core asset register of all properties that have an active asbestos management surveys and R&D surveys. This register should identify asbestos surveys and ACMs within all domestic, non-domestic (communal) and other properties.

Appropriate asbestos surveys and R&D surveys will be made available to all interested stakeholders as required.

WHA will establish and maintain accurate records of all completed asbestos related completed remedial works

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## ROLES AND RESPONSIBILITIES

The Board has overall governance responsibility for health and safety and compliance and ensuring the organisation complies with all relevant legislation and regulation.

The Director of Operations will oversee the implementation of the Asbestos Policy, with operational support from the Head of Assets and day to day the Asset Compliance Officer.

The Asset and Compliance Officer will have responsibility for ensuring accurate record keeping.

The Property Services Officers will be responsible for overseeing the delivery of agreed survey inspection programmes and the prioritisation and implementation of any works arising from surveys.

## COMPETENT PERSONS

As it is a legal requirement under regulation 10, all relevant property services officers, technical officers and external contractors working on behalf of WHA must have certificated evidence of suitable asbestos training such as an approved asbestos awareness training certificate in order to be permitted to work at any of the stock/sites.

Contractors working on behalf of WHA will have Asbestos Awareness Training, provided by a UKATA or equivalent approved provider. Certificates and/or e-certificates showing compliance with this requirement must be checked by WHA Asset Compliance Officer on an annual basis and evidenced appropriately.

## TRAINING

Appropriate training will be provided to officers on asbestos awareness and this policy and the procedures. This will include team and contractor briefings, e-learning and access to external training. Training will be provided by a UKATA approved provider or equivalent.

WHA will ensure that the officers responsible for operational delivery receive appropriate training to be able to manage the service.

All Asbestos Consultancies working with WHA will be UKAS accredited or equivalent.

## PERFORMANCE REPORTING

Robust key performance indicator (KPI) measures will be established and maintained to ensure WHA is able to report on performance in relation to asbestos safety.

KPI measures will be provided at Senior Management Team and Board level and be produced on a quarterly basis.

## NON-COMPLIANCE

Any non-compliance issue identified at an operational level will be formally reported to the Head of Assets in the first instance.

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The Head of Assets will agree an appropriate course of corrective action with the operational team in order to address the non-compliance issue and report details of the same to the Executive Management Team (EMT).

EMT will ensure the Board are made aware of any non-compliance issue so they can consider the implications and take action as appropriate.

#### **DATA PROTECTION**

When handling data sheets staff will come into contact with personal information. The handling and use of the data will be carried out under the General Data Protection Regulations 2018.

#### **MONITORING AND REVIEW**

We will monitor and report on compliance performance and use this information to identify areas for improvement.

This policy will be reviewed every 3 years, or sooner if required by statutory, regulatory or best practice.

#### **EQUALITY IMPACT ASSESSMENT**

In implementing this policy, we aim to treat all customers fairly. An equality impact assessment has been carried out. Where customers require additional support, we will endeavour to provide a service that seeks to meet the needs of a particular individual or household.

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