

Housing and Modernisation department asbestos management plan

January 2016

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Management of asbestos, including working with and near asbestos containing materials and to inform you on how and when to report suspected or actual asbestos exposure.

For further advice and guidance please contact the departmental health and safety adviser or the asbestos compliance team – asbestos@southwark.gov.uk

Version Number	2016
Brief note on changes	None
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Date of Change	January 2016
Expected Date of next review	January 2017

Contents

1.0	Introduction	4
2.0	Scope	4
3.0	Definitions	4
4.0	Abbreviations	5
5.0	Legislation, regulations and guidance	6
5.1	Control of Asbestos Regulations (2012) (CAR).....	6
5.2	Health and Safety at Work etc Act 1974	7
5.3	Management of Health and Safety at Work Regulations 1999 (MHSWR)	7
5.4	Construction (Design and Management) Regulations 2007 (CDM)	7
5.5	Workplace (Health Safety and Welfare) Regulations 1992	7
5.6	HSG 264 Asbestos: The survey guide (2010)	7
5.7	ACoP L127- "The management of asbestos in non-domestic premises"	7
5.8	ACoP L143- "Work with materials containing asbestos"	7
6.0	Asbestos – dangers, types and use	7
6.1	What is asbestos?	7
6.2	What are the dangers of asbestos?	8
6.3	Where can you find asbestos?	8
6.4	Employees who may be at risk.....	10
7.0	Record keeping and communication	10
7.1	Asbestos database	10
7.2	Information held at premises – tenanted areas	11
7.3	Information held at premises – communal areas	11
7.4	Asbestos survey reports and sample analysis reports	11
7.5	Asbestos removal certification.....	12
7.6	Records of exposure to asbestos.....	12
7.7	Survey information - right to buy applicants	12
7.8	Sold property - leaseholders and owner occupiers	13
7.9	Consultation with residents for surveys/removal work	13
7.10	Construction (Design and Management) Regulations (CDM)	13
8.0	Surveys and sampling	13
8.1	Requirements for surveys	13
8.2	Survey types.....	14
8.3	Risk assessments	15
8.4	Surveys of housing stock	16
8.5	Sampling of housing stock	17
8.6	Re-inspection of known ACMs	17
9.0	Processes and procedures	18
10.0	Asbestos removal	18
10.1	Southwark council's strategy for asbestos removal	18
10.2	Licensed asbestos removal contractors (LARC)	19
10.3	Notifiable works	19
10.4	Auditing asbestos removal works.....	19
10.5	Air testing	20
11.0	Training	20
11.1	Requirements for training	20
11.2	Groups requiring training.....	21
11.3	Scope of training	21
11.4	Training records	22
12.	Monitoring, reviewing and improving.....	22
12.1	Monitoring of compliance	22
12.2	Website proposal.....	23
12.3	Review of this plan	23

Housing and Modernisation

asbestos management plan

A.	Appendices: Procedures - flow charts	24
A1	Procedure for customer service centre staff.....	25
A2	Procedure for area repairs technical officers.....	26
A3	Procedure for contractor planners.....	27
A4i	Procedure for contractors: in-hours work	28
A4ii	Procedure for contractors: out-of-hours work.....	29
A5	Procedure for disrepairs	30
A6	Procedure for investment project works	31
A7	Procedure for surveys for investment project works	32
A8	Procedure for emergencies.....	33
A9	Procedure for the discovery of a suspect material	34
A10	Procedure for one off projects/contracts	35
A11	Procedure for empty homes/voids work	36
A12	Procedure for programmed work	37
A13	Procedure for the discovery of damaged material.....	38

1.0 Introduction

The Asbestos Management Plan supports the LBS Policy for the Management of Asbestos in the Workplace (April 2012) and offers guidance to staff on all matters relating to the management and control of asbestos in communal areas and domestic properties within the housing services department.

The asbestos management plan is the pivotal document from which the whole asbestos management process is controlled and managed.

The asbestos management plan 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 including the asbestos database and information located at premises.
- 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

The will be regularly reviewed and updated. It is version controlled and issue dated to demonstrate that it is a controlled document and a continual ongoing process document.

2.0 Scope

This asbestos management plan is written for all housing services managers and staff including Southwark Building Services staff 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 plan should be read in conjunction with the council's Policy for the Management of Asbestos in the Workplace (April 2012).

3.0 Definitions

Asbestos: The generic term for a group of naturally occurring fibrous silicate. In the '*Control of Asbestos Regulations 2012 (CAR 2012)*', the term 'Asbestos' includes crocidolite, amosite, chrysotile, fibrous anthophyllite, actinolite and tremolite or any mixture of those materials.

Housing and Modernisation

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Asbestos Coordinator: Responsible for day to day management of asbestos management services, projects and programmes in line with current legislation and the council's code of practice.

Asbestos Inspection: An inspection of buildings, structures, plant and land, conducted by an '*Asbestos surveyor*', where the prime objective is to determine or assume the location, type and condition of materials containing Asbestos.

Client: Generally, this is used to describe the employer or person commissioning the inspection or survey. Where used in the context of the CDM Regulations (*Construction (Design and Management) Regulations*), it has a specific legal definition

Deleterious materials: A material or component that has the potential to cause harm. In the property world, this term is usually associated with building materials or components that can result in the deterioration of the building fabric or structure, or which constitute a risk to the health and safety of the occupants.

Duty Holder: The person or persons legally responsible for ensuring that a regulation is complied with.

Hazard: Something with the potential to cause harm.

Risk: The likelihood of harm occurring and the severity of the consequences

4.0 Acronyms

ACM	Asbestos Containing Material
ACoP	Approved Code of Practice
ACT	Asbestos Compliance Team
ARCA	Asbestos Removal Contractors Association
CAR	Control of Asbestos Regulations
CSC	Customer Service Centre
CDM	Construction (Design and Management) Regulations
EXOR	Web based outsourced chain supply service to public and private sector organisations.
HSC	Health and Safety Commission - responsible for instigating regulations

HSE	Health and Safety Executive - responsible for enforcing regulations
LARC	Licensed Asbestos Removal Contractor
LBS	London Borough of Southwark
RICS	Royal Institution of Chartered Surveyors
TMO	Tenants Management Organisation
TRA	Tenants and Residents Association
UKAS	United Kingdom Accreditation Service

5.0 Legislation, regulations and guidance

Since the first introduction of the Asbestos Prohibitions Regulations in 1985, the importation and use of all types of asbestos within the UK has gradually been banned with few specific exceptions. Work with and involving asbestos is now covered under a number of different pieces of legislation including, but not restricted to:

5.1 Control of Asbestos Regulations (2012) (CAR)

The Control of Asbestos Regulations (2012) are the overriding Regulations relating to Asbestos and Regulation 4 'the management of asbestos in non-domestic properties' places duties on those who control premises to;

- Take reasonable steps to determine the location and condition of materials likely to contain asbestos.
- Presume materials contain asbestos unless there is strong evidence that they do not.
- Make and keep an up to date record of the location and condition of the Asbestos Containing Material (ACM) or presumed ACMs in the premises.
- Assess the risk of the likelihood of anyone being exposed to fibres from these materials.
- Prepare a plan setting out how the risks from the materials are to be managed.
- Take the necessary steps to put the plan into action.
- Review and monitor the plan periodically.
- Provide information on the location and condition of the materials to anyone who is liable to work on or disturb them.

All those who have responsibility for the maintenance and/or repair of non-domestic premises have duties under Regulation 4 of CAR (2012).

London Borough of Southwark (Southwark Council) will be the duty holder for all freehold premises and will also have responsibilities as landlord or tenant in some properties. The extent of the legal duty is determined by the terms of any tenancy agreement or contract that applies, and in the absence of any such agreement, on the degree of control the party has over the premises. In most cases the duty holder will be the party who has contractual responsibility for the maintenance and repair of that premises.

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5.2 Health and Safety at Work etc Act 1974 applies to all risks and requires employers to conduct their work in such a way that their employees will not be exposed to health and safety risks, and to provide information to other people about their workplace which might affect their health and safety. Section 3 of HSWA contains general duties on employers and the self-employed in respect of people other than their own employees. Section 4 contains general duties for anyone who has control, to any extent, over a workplace.

5.3 Management of Health and Safety at Work Regulations 1999 (MHSWR) require employers and self-employed people to make an assessment of the risks to the health and safety of themselves, employees and people not in their employment arising out of or in connection with the conduct of their business - and to make appropriate arrangements for protecting those people's health and safety.

5.4 Construction (Design and Management) Regulations 2015 (CDM) require the client to pass on information about the state or condition of any premises (including the presence of hazardous materials such as asbestos) before any work commences and to ensure that the health and safety file is available for inspection by any person who needs the information.

5.5 Workplace (Health Safety and Welfare) Regulations 1992 require employers to maintain workplace buildings so as to protect occupants and workers.

5.6 HSG 264 Asbestos: The survey guide (2010) – guidance for those carrying out or commissioning asbestos surveys

5.7 HSG 247 Asbestos: The licensed asbestos contractor's guide (2006) for businesses holding a license to work with (either repair or removal of) asbestos-containing materials (ACMs)

5.8 L143 Managing and working with asbestos: Control of Asbestos Regulations 2012. Approved Code of Practice and guidance (2013). This publication contains the Control of Asbestos Regulations 2012, the Approved Code of Practice (ACOP) and guidance text for employers about work which disturbs, or is likely to disturb, asbestos, asbestos sampling and laboratory analysis. It combines and replaces the previous ACOPs L127 and L143.

6.0 Asbestos – dangers, types and use

6.1 What is asbestos?

Asbestos is a term used for the fibrous forms of several naturally occurring silicate minerals. The fibres have high tensile strength and chemical, electrical and heat resistance which mean ACMs have been used extensively in building products such as roofing, cladding, thermal insulation and fire-resistant internal panelling.

Millions of tonnes of asbestos materials have been imported into the UK, of which the largest proportions have been used in building products. The three main types of asbestos used commercially are:

- Crocidolite (known as 'blue asbestos')
- Amosite (known as 'brown asbestos')
- Chrysotile (known as 'white asbestos')

In addition there are 3 less commonly used forms of asbestos:

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- Actinolite
- Anthrophyllite
- Tremolite

The use of asbestos in building materials was mainly between 1950 – 1999, therefore if a building was built before 2000 it may contain asbestos.

Often, it is not possible to distinguish asbestos containing products by visual inspection alone and therefore materials have to undergo sampling and laboratory analysis. All suspect materials should be treated as containing asbestos unless it can be proved otherwise.

6.2 What are the dangers of asbestos?

If ACMs are in good condition and are not disturbed, they pose no risk to health. When disturbed, ACMs could release asbestos fibres that can be inhaled into the lungs.

When asbestos fibres are inhaled they can cause fatal diseases which are responsible for approximately 4500 deaths a year.

There are four main diseases associated with occupational exposure to asbestos:

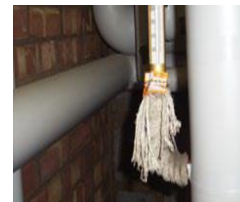
- Asbestosis (a non-malignant scarring of the lung tissue)
- Mesothelioma (a form of cancer mainly affecting the lining of the lungs)
- Asbestos related lung cancer
- Non malignant pleural disease (diffuse pleural thickening and pleural plaques)

6.3 Where can you find asbestos?

The following table identifies the common uses of asbestos containing materials in buildings:

Asbestos Product	What does it look like?	Where can you find it?	How Dangerous is it?
Loose insulation		Now rarely found but may be encountered unexpectedly e.g. DIY loft insulation and fire packing between floors. Loft spaces Under floorboards Cavity walls	Loose fill asbestos may readily become airborne if disturbed. If dry, these materials can lead to high exposures. Covers may deteriorate or be easily damaged by repair work or accidental contact.
Sprayed coatings		Thermal and anti-condensation insulation on underside of roofs and sometimes sides of industrial buildings and warehouses. Acoustic insulation in theatres, halls etc. Fire protection on steel and	This contains up to 85% asbestos and can break up very easily. Sprays have a high potential for fibre release, particularly if knocked or the surface delaminates from underlying surface. Dust

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		reinforced concrete beams/columns and on underside of floors. Overspray of target areas is common.	released may accumulate on false ceilings, wiring and ventilation systems.
Thermal insulation	 	Thermal insulation of pipes, boilers, pressure vessels, calorifiers etc.	Contains up to 85% asbestos. The ease of fibre release often depends on the type of lagging used and the surface treatment. Often it will be encapsulated with calico and painted (e.g. PVA, EVA, latex, bitumen or proprietary polymer emulsions or PVC, neoprene solutions).
Asbestos boards	 	Millboard and Asbestos Insulating Board (AIB). Used for fire protection, thermal and acoustic insulation, resistance to moisture movement and general building board. Found in service ducts, firebreaks, infill panels, partitions and ceilings (including ceiling tiles), roof underlay, wall linings, soffits, external canopies and porch linings. Also in or lining fire doors.	Millboard has a high asbestos content and is easy to break. AIB can be readily broken, giving significant fibre release. Also significant surface release is possible by abrasion, but surface is usually painted or plastered. Sawing and drilling will also give significant releases
Textiles	 	Rope and yarns used as lagging on pipes, jointing and packing materials and as heat/fire-resistant boiler, oven and flue sealing. Plaited asbestos tubing in electric cable. Cloths and yarns used as thermal insulation including fire-resisting blankets, mattresses, protective curtains, gloves aprons and overalls.	Weaving reduces fibre release from products, but abrading or cutting the materials will release fibres, likely to degrade if exposed, becoming more friable with age. If used with caulking, fibres will be encapsulated and less likely to be released.
Cement Products	 	Roofing, wall cladding, permanent shuttering, partitioning. Decorative panels, fascias, bath panels, soffits, linings to walls and ceilings, fire surrounds, panels for fire protection. Cisterns and tanks, drains, pipes, flues, vents, ducts, soffits, copings and promenade tiles	Likely to release increasing levels of fibres if abraded, hand sawn or worked on with power tools. Exposed surfaces and acid conditions will remove cement matrix and concentrate unbound fibres on surface and sheet laps. Cleaning asbestos-containing roofs may also release fibres.

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Textured coatings		Decorative coatings on walls and ceilings e.g. Artex	Chrysotile added up to 1984 but old stock may have been used for several more years. Generally fibres are well contained in the matrix but may be released when old coating is sanded down
Floor tiles and reinforced resin composites	 	Thermoplastic floor tiles. PVC vinyl floor tiles and unbacked PVC flooring. Asbestos paper-backed PVC floors. Magnesium oxychloride flooring used in WCs, staircases and industrial flooring. Used for toilet cisterns, banisters, window sills and bench/shelf tops.	Fibre release is unlikely to be a hazard under normal services conditions. Fibre may be released when material is cut, and there may be substantial release where flooring residue, particularly paper backing, is power-sanded. Very hard, fibre release unlikely. Fibres unlikely to be released, limited emissions during cutting.

6.4 Employees who may be at risk

Those working on or in buildings are most at risk of exposure to asbestos. Southwark Council Housing employees who may be at risk include:

- Repairs and maintenance staff
- Surveyors / engineers
- Project managers
- Capital works partners staff
- Capital works project staff
- Mechanical & electrical planned partners staff
- Estate services staff
- Area management staff

7.0 Record keeping and communication

7.1 Asbestos database

All information on the presence of asbestos identified through asbestos surveys or sampling is held on the asbestos database (APEX). This applies to the common areas of estates and domestic properties that have been surveyed. The information is updated following identification of new ACMs through surveys, re-inspections, a change in risk rating or removal.

The following information is included on the asbestos database

- Location of asbestos containing materials (ACM)
- Type of asbestos present
- Condition of asbestos (material assessment)
- Likelihood of disturbance of ACM (priority assessment)
- Asbestos Risk Assessment (material and priority assessments combined)
- Survey company / surveyor

Housing and Modernisation

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- Survey date / re inspection date
- Whether ACM is identified, presumed or strongly presumed to contain asbestos
- Whether ACM has been removed

All of the information from inspections is included on the asbestos database, including non accessed areas and products that have been sampled and do not contain asbestos, to stop duplication of surveys and sampling, and assist with programming future works.

The Asbestos Coordinator is responsible for ensuring that the APEX asbestos database is maintained and up to date. The asbestos compliance team admin, housing technical officers and investment officers are directly responsible for promptly notifying the asbestos coordinator of any changes to Asbestos-related knowledge within their area. Data loading of all surveys and updated information is carried out by the asbestos compliance team who aim to prevent delays and improve document control and security. The team are currently moving towards a fully electronic automated system for updates.

The term contractors such as SBS and Mears have Citrix access to the council intranet providing them access to the asbestos database via the Area Housing Management Online Reporting portal to consult asbestos records prior to works. As well as checking the asbestos database via this resource relevant asbestos information for a property is displayed on works orders issued to the building repair contractors.

The asbestos compliance team can forward electronic copies of information to any contractors that do not have access.

7.2 Information held at premises – tenanted areas

New tenants are issued with a tenancy handbook along with their tenancy agreement. The tenants' handbook states that "you are only entitled to carry out changes and improvements to your home when you have got our permission in writing". The tenancy agreement states that tenants must contact the council before undertaking any home improvements within their home. New tenants also receive a copy of the asbestos register for their property.

Existing Residents will receive details and guidance leaflets with regard to Asbestos and ACMs present in their properties where surveys are carried out.

Additionally, an asbestos awareness leaflet has been distributed to Area Housing Offices and one stop shops providing general advice to tenants.

7.3 Information held at premises – communal areas

The Asbestos Compliance Team Officers, during their re-inspections label ACMs with asbestos A label warning stickers. This is only carried out in common areas where tenants/ the public do not have access.

7.4 Asbestos survey reports and sample analysis reports

When an asbestos survey is carried out or sampling of a suspect material is performed, all relevant information is made available to the Asbestos Compliance

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Team to enter on to the asbestos database or filed. Survey reports and sample analysis results are saved as PDF documents.

7.5 Asbestos removal certification

Where ACMs have been subject to repair/encapsulation or removal works this must be notified to the Asbestos Co-ordinator in the agreed format for updating the Asbestos Database. This is currently undertaken via daily emails from the removal contractors. It is envisaged that an automated system for updates via a Web Portal will be in place imminently.

A copy of all relevant paperwork including, plans of works, ASB5 (where necessary) and Waste Consignment Notes (WCNs) must be made available to the ACT as soon as possible. These are saved in a structured electronic filing system.

7.6 Records of exposure to asbestos

The Approved Code of Practice (L143) states “For any employee who was not wearing adequate RPE or has been potentially exposed to asbestos fibres in an incident, a note that the exposure has occurred must be made on that employee’s health record. If the employee does not have a health record, the note must be made on that employee’s personal record.”

In cases of suspected or actual exposure to asbestos, the affected person and the line manager must complete the HS1/2 accident/incident report form and send a copy to the Housing health and safety team within 48 hours. These records are kept by the health and safety team for forty years from the date of suspected or actual exposure.

Where actual asbestos exposure has been confirmed, the Housing health and safety and risk team will be informed (through the HS1/2 reporting system and further investigation and reports as necessary). The Housing H&S&R team will report the exposure to the Health and Safety Executive in accordance with the RIDDOR regulations (Reporting of Injuries, Diseases and Dangerous Occurrences). Copies of F2508s (reported to HSE) will be kept available for inspection by the health and safety and risk team for a minimum of five years and kept archived for 40 years.

7.7 Survey information - right to buy applicants

When a tenant or other expresses a desire to buy a property from Southwark Council they will be advised that there may be asbestos within the property and they are recommended to have their own asbestos survey carried out to confirm the presence and condition of ACMs.

Where Southwark have previously carried out an asbestos survey, the prospective purchaser will be advised of this. This information is included within the ‘Offer Notice’ issued to all right to buy purchasers. It is the responsibility of the right to buy sales & leasehold section to ensure this information is provided.

Any asbestos-related information held on Southwark’s asbestos database will be made available to any potential purchaser on request, in accordance with the Southwark Freedom of Information policy. Full details from the asbestos database relating to the property will be forwarded, upon request, to the potential purchaser on receipt of a formal offer to purchase.

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It is not, however, Southwark's responsibility to remove any asbestos containing materials unless it is considered hazardous. An independent asbestos surveyor, if requested, must inspect the property and carry out a 'material risk assessment'. If removal or remedial works are required as it poses a health risk, the general asbestos procedures must be applied.

7.8 Sold property - leaseholders and owner occupiers

If a property has been sold it will no longer be the responsibility of the council to remove any asbestos containing materials within the dwelling. The leaseholder or owner-occupier can be given the details of the Health and Safety Executive (HSE) website, where detailed information on asbestos can be found. The asbestos team can also give advice on asbestos enquires by phone or email.

If however, the ACM is within a communal area or affects a communal area, Southwark council retains responsibility in accordance with CAR 2012.

7.9 Consultation with residents for surveys/removal work

Where asbestos surveys or removal works are undertaken in dwellings, consultation with residents is via the contractor to ensure that information regarding risk and disruption is communicated effectively. Technical officers will liaise with residents regarding loss of facilities.

Asbestos removal contractors take care to keep residents and anyone else affected by the process well informed throughout the works in order to minimise disruption and to avoid any comments that may give rise to unnecessary concern.

In planning and executing removal work, inconvenience must be kept to a minimum and care should be taken to ensure that where enclosures are erected, safe egress is not compromised.

7.10 Construction (Design and Management) Regulations (CDM)

All matters pertaining to housing services' obligations under the Construction (Design and Management) Regulations – CDM are dealt with by the housing services CDM manager. This includes ensuring that appropriate information on the presence of asbestos is provided to contractors/project teams to allow adequate risk assessments to be undertaken.

8.0 Surveys and sampling

8.1 Requirements for surveys

HSG 264 'Asbestos the Survey Guide' provides guidance on sampling regimes for clients with housing stock to meet the duties of regulation 4 of The Control of Asbestos Regulations.

The guidance acknowledges that surveying/sampling of all units is unlikely to be reasonably practicable and as such "a proportion should be surveyed until the results demonstrate as far as reasonably practicable that there is consistency in the range of ACMs in the property type". The intention is to develop an understanding of the range of ACMs in any property type to allow them to be managed on that basis. Where there is considerable variability in property type, the ratio surveyed will be high.

Southwark council's housing services department will;

- Undertake management surveys along with re-inspections when required.
- Manage and monitor a rolling programme of asbestos management surveys along with inspections across all communal areas of multi tenanted dwellings.
- Carry out any additional requests for asbestos surveys as and when required.
- Ensure that all information is recorded accurately on the asbestos database.
- Comply with the statutory obligation of Regulation 4 of the Control of Asbestos Regulations 2012 (CAR 2012).

8.2 Survey types

In January 2010 the standard types of asbestos survey were renamed. The two standard survey types are;

- Management survey
- Refurbishment/demolition survey

8.2.1 Management Surveys

The purpose of the management survey is to locate ACMs that could be damaged or disturbed by normal activities, by foreseeable maintenance, or by installing new equipment. This is to allow the management of ACMs during the normal occupation and use of premises to ensure that;

- nobody is harmed by the continuing presence of ACMs in the premises or equipment;
- the ACMs remain in good condition; and
- nobody disturbs it accidentally

A management survey involves minor intrusion and disturbance and a combination of sampling ACMs and presuming ACMs. The survey includes an assessment of the condition of ACMs and their ability, if disturbed, to release fibres into the air.

8.2.2 Refurbishment and demolition surveys

An asbestos refurbishment survey is needed before any void or other refurbishment work is carried out that will disturb the fabric of a building. Refurbishment surveys can be location specific concentrating on the rooms and or locations where refurbishment works are due to take place. The specific areas and scope of work must be agreed between the survey requestor and the asbestos compliance team before the survey commences. However further refurbishment or demolition surveys will be necessary in the other locations when new works take place. Localised refurbishment surveys should have the specific purpose of identifying ACMs for, removal, control and avoidance during the refurbishment works.

A refurbishment/demolition survey aims to ensure that:

- nobody will be harmed by work on ACMs in the premises or equipment;
- such work will be done by the correct contractor in the correct way.

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8.3 Risk assessments

Following on from management surveys and sampling, all ACMs are assessed and given a risk classification which is recorded on the asbestos database. The risk assessment is comprised of 2 parts;

- **Material Assessment** – an assessment of the condition of the ACMs and their ability to release fibres (carried out as part of the management survey)
- **Priority Assessment** – undertaken by the duty holder to assess the risk based on their detailed knowledge of the activities carried out in the premises (carried out by asbestos officers using the APEX asbestos database)

The combined material and priority assessment result is used to establish the priority for those ACMs needing remedial action and the type of action that will be taken.

8.3.1 Material assessment

Each ACM is assessed using the HSE Material Assessment Algorithm contained within the Survey Guide HSG264.

The material assessment covers;

- Product type
- Extent of damage/deterioration
- Surface treatment
- Asbestos type

The assessment bands are as follows;

Band	Score	Potential to release asbestos fibres
A	10 or more	High
B	7-9	Medium
C	5-6	Low
D	4 or less	Very Low

8.3.2 Priority assessments

Each ACM is assessed according to priority by the asbestos team. The priority assessment covers;

- The location of the material
- Its extent
- The use to which the location is put
- The occupancy of the area
- The activities carried on in the area
- The likelihood/frequency with which maintenance activities are likely to take place

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The assessment bands are as follows;

Band	Score	Priority Risk Rating
A	10 or more	High
B	7-9	Medium
C	5-6	Low
D	4 or less	Very Low

8.3.3 Combined risk scores

When the material and priority scores are added together a combined risk score is achieved for the ACM (this is an automated process on Apex);

Material Assessment					
Priority Assessment		10- 12	7 - 9	4 - 6	0 - 3
	10 - 12	High	High	Medium	Medium
	7 - 9	High	Medium	Medium	Low
	4 - 6	Medium	Medium	Low	Low/Very Low
	0 - 3	Medium	Low	Low/Very Low	Very Low

- **High Risk** ACMs (score >19) are likely to be in a condition or location which requires urgent action, most likely removal.
- **Medium Risk** ACMs (score 13 – 18) are likely to be in a condition or location which require some remedial action such as minor repairs to allow their score to be reduced so they can be managed as below.
- **Low Risk and Very Low Risk** ACMs (score <12) are likely to be in a location and condition which does not give rise to a health risk providing the materials remain undisturbed. These ACMs will be managed in situ.

All ACMs in common areas are subject to re-inspection, following which the risk scores are reassessed (see section 5.6).

8.4 Surveys of housing stock

Management surveys have been undertaken to a proportion of tenanted properties and all communal areas.

Year on year, Southwark council will aim to increase the percentage of premises with asbestos surveys by 10%. This will be realised through programmes such as voids, decent homes, planned works and routine requests from day to day repairs.

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8.5 Sampling of housing stock

If samples of a suspect material are required, this is carried out by the council's UKAS accredited term asbestos surveying and analytical contractor, currently Pennington Choices Ltd. This is a 24 hour service. Pennington Choices also carries out asbestos surveys as requested e.g. prior to works.

8.6 Re-inspection of known ACMs

Risk Rating Score

>19

<12

Inspection Frequency

Once per three months or on reported damage

Annually or on reported damage

The visual re-inspection of ACMs in areas listed is undertaken annually by qualified Technical Officers Asbestos.

Location	Re-inspection carried out by
Communal areas of Housing Stock	Technical Officers Asbestos
TRA/TMO halls	Technical Officers Asbestos
Boiler rooms/lift motor rooms etc	Technical Officers Asbestos
Switch rooms/electrical cupboards etc	Technical Officers Asbestos
Hostels	Technical Officers Asbestos

Information gathered following re-inspections will be collated by the asbestos coordinator and asbestos technical officers who will ensure the electronic uploading onto the APEX asbestos database.

Any damage or deterioration identified during the re-inspection will be noted and a service request raised to one of the term licensed asbestos removal contractors to carry out the remediation or removal work required.

The re-inspections of known ACMs is undertaken by qualified asbestos technical officers who hold British Occupational Hygiene Society (BOHS) qualifications in proficiency for Buildings Surveys and Bulk Sampling for Asbestos (including risk assessment and risk management strategies (P402) and the management of asbestos in buildings (P405).

9.0 Processes and procedures

Procedures are in place to cover how asbestos is managed. These are all detailed in the appendices.

- 9.1 [Procedure for customer service centre staff](#) (Appendix A1)
- 9.2 [Procedure for area repairs technical officers](#) (Appendix A2)
- 9.3 [Procedure for contractor planners](#) (Appendix A3)
- 9.4 [Procedure for contractors](#) (Appendix A4i and ii)
- 9.5 [Procedure for disrepairs](#) (Appendix A5)
- 9.6 [Procedure for investment project works](#) (Appendix A6)
- 9.7 [Procedure for asbestos surveys for investment project works](#) (Appendix A7)
- 9.8 [Procedure for emergencies](#) (Appendix A8)
- 9.9 [Procedure for the discovery of suspect material](#) (Appendix A9)
- 9.10 [Procedure for one off projects/contracts](#) (Appendix A10)
- 9.11 [Procedure for empty homes work/void properties](#) (Appendix A11)
- 9.12 [Procedure for programmed works](#) (Appendix A12)
- 9.13 [Procedure for the discovery of damaged material](#) (Appendix A13)

10.0 Asbestos removal

10.1 *Southwark council's strategy for asbestos removal*

Asbestos containing material (ACM) will be removed if;

- The location is such that it poses a risk of being disturbed
- There is damage to the material such that it poses or is likely to pose a health risk
- There is deterioration to the material such that it poses or is likely to pose a health risk
- The material could be disturbed by necessary repair or maintenance works
- Where an investment/capital project is taking place within the location
- Where voids work are taking place within the location

asbestos management plan

10.2 Licensed asbestos removal contractors (LARC)

Any work involving asbestos containing materials including the removal, repair or encapsulation of asbestos materials is to be carried out by a licensed asbestos removal contractor (irrespective of whether the ACM is 'notifiable').

All LARCs engaged to carry out work in Southwark council properties must be on the Southwark approved contractors list currently managed by EXOR.

Asbestos removal and remediation works for day to day works can only be undertaken by the two term asbestos removal contractors Ductclean and Franklyn Shaw.

10.3 Notifiable works

Some asbestos removal work will require the licensed removal contractor to give 14 days notification to the HSE prior to starting any work. The main types of asbestos containing material where notification is required are as listed below:

- Asbestos insulation / lagging
- Asbestos sprayed coatings
- Asbestos insulating board (AIB)

The notification is made to the HSE using the ASB5 online form, always by the approved licensed asbestos removal contractor. A copy of the relevant ASB5 must be included in the project file, which **MUST** be sent to the HSE /asbestos officer **BEFORE** works begin and forwarded to the asbestos coordinator on completion of works.

10.4 Auditing asbestos removal works

A check list is in place for the asbestos officers to carry out random checks on asbestos removal contractors prior to and during asbestos removal or encapsulation. The check list covers on and off site operations and is for responsive and planned works and therefore not all of the items relate to all works.

The check list covers;

- Documentation (instructions from Southwark, specifications etc)
- Plan of Work
- ASB5 where applicable.
- Current training certificates in accordance with chapter 4 of HSG 247
- Current Medical certificates in accordance with regulation 22 of CAR 2012 (2 Year)
- Masks certification
- Face fit certificate
- Site file mask check
- Daily exposure sheet
- Copy of method statements including site specific plan of work (including drawings)
- Consignment note(s)

Asbestos officers also audit completed asbestos removal works with a target of 10%.

asbestos management plan

10.5 Air testing

During and following certain ACM removal works or disturbance, air testing / analysis when required, is to be undertaken by the independent UKAS accredited asbestos air monitoring and sampling term contractor, Armstrong York. This will be arranged by the asbestos compliance team or competent officers. Armstrong York is the council's term contractor for this service and is the ONLY contractor allowed to undertake this activity.

The Health and Safety Executive has set control limits on acceptable levels of asbestos fibres in the atmosphere. The control limit for asbestos is 0.1 asbestos fibres per cubic centimetre of air (0.1 f/cm³). This is the maximum permissible level before control measures are required and respiratory protective equipment is mandatory.

Clearance asbestos air monitoring tests the air to measure the level of airborne asbestos fibres in an area following work or removal of asbestos containing materials. An area is 'cleared' when the level of airborne asbestos fibres is measured as being below 0.01 fibres/cm³. Any clearance tests exceeding this would mean the removal contractor would have to re-clean the affected area concerned, and another clearance test would have to be undertaken.

11.0 Training

11.1 Requirements for training

Regulation 10 of the Control of Asbestos Regulations requires every employer to make sure that anyone who is liable to disturb asbestos during their normal work, or who supervises those employees, gets the correct level of information, instruction and training so that they can work safely and competently without risk to themselves or others.

ACoP L143 details out the level of training required for different groups, recommending asbestos awareness training for "those persons who are liable to disturb asbestos while carrying out their normal everyday work, or who may influence how work is carried out".

ACoP L143 does not stipulate exact requirements for training providers but does require asbestos training to be carried out by "someone who is competent to do so". This individual must have personal practical experience as well as an understanding of the work being carried out by the organisation that training is being provided to.

The HSE states that refreshing information instruction and training for others, information instruction and training could be given as part of other health and safety updates or, for example, as part of a toolbox talk or e-learning to refresh experienced workers on the main principles and expectations.

Asbestos Awareness Training is provided by a well qualified and competent member of staff from Pennington Choices or the Asbestos Co-ordinator. A full classroom based course is delivered to all new members of staff. An on-line e-learning asbestos awareness course is used as an annual refresher for all member of staff who have completed the full asbestos awareness course in the classroom.

asbestos management plan

11.2 Groups requiring training

The main groups of council workers that are deemed to be at risk from asbestos exposure and those who order works that may expose operatives to asbestos are the groups most requiring asbestos awareness training. These are as follows:

- Repairs and maintenance staff (operatives/surveyors/engineers)
- Capital works project staff
- Contractors (including external contractors who undertake their own training)
- Customer service centre (call centre) staff
- Resident officers
- Tenant management organisation (TMO) staff
- Asbestos repairs admin
- Asbestos officers
- Health and safety and risk advisers/managers
- Departmental and divisional management team

Managers are responsible for ensuring that all relevant staff attend the applicable training course. This training is mandatory. Training covers general asbestos awareness as well as additional areas relevant to job roles.

11.3 Scope of training

Asbestos awareness training covers topics as detailed in ACoP L143 including;

- Properties of asbestos and its effects on health, including links to smoking
- Types of asbestos and where it is likely to be found
- General procedures to be followed in the event of an emergency involving asbestos
- How to avoid the risks of asbestos

All the training courses detailed below must be attended by staff working in the areas above with refresher courses every **year or where changes to regulations dictate otherwise**. All “new starters” working in the areas above must receive specific induction information at the onset of their employment and the relevant training within 6 months of their engagement. Team managers are responsible for ensuring that their staff are included in asbestos awareness training.

Asbestos awareness training is delivered by competent individuals from Pennington Choices who are members of United Kingdom Asbestos Training Association (UKATA) or can otherwise demonstrate the necessary levels of competence.

A full asbestos awareness course is for new starters or those members of staff who have not done a session before. Members of staff who have undertaken an asbestos awareness course must complete a yearly refresher session which is currently an online e-learning course provided by the National Asbestos Training & Accreditation Scheme (NATAS).

Asbestos Awareness

Attendees	Contents
Surveyors Engineers Major works project staff Repairs and maintenance staff Resident officers CSC management Customer service centre staff TMO staff	- General legislation - legal obligations - health & safety - health hazards - What to do and not to do if you come across asbestos - emergency procedures - locations and uses of asbestos - surveys and registers - surveying procedures - contracts - pre, during and post - The role of asbestos removal contractor - The role of asbestos compliance officer

In-house training (Asbestos Management Plan)

Attendees	Contents
Departmental and divisional management team Health and safety officers/managers Asbestos officers Asbestos compliance team	- Reviewing management of ACMs - Prevention of work on buildings until presence of ACMs has been established - Initial inspection of buildings – Are the results of this inspection adequate? - Risk assessments and priorities for management - Monitoring and reviewing management plans

11.4 Training records

ACoP L143 states that records should be kept of the training of each individual.

Departmental managers are responsible for maintaining training records. The asbestos compliance team will retain copies of training attendance and certificates and will periodically request evidence that training sessions have been attended by all staff requiring training..

12. Monitoring, reviewing and improving

12.1 Monitoring of compliance

Southwark will monitor and manage a number of key indicators to ensure the highest levels of control over asbestos performance.

To oversee partnering contractor adherence to risk assessment on issued work orders the asbestos database will be interrogated to ensure records are being viewed prior to works being carried out. All contractors will be expected to assess each repair order and access the property details where practicable. Performance will be

Housing and Modernisation

asbestos management plan

measured by dividing the number of work orders issued to an individual contractor by access to the database.

The percentage figure will take into consideration overnight emergencies, external works, and general orders where no risk to asbestos exposure exists.

General health and safety audits are carried out on the term contractors on a quarterly basis and asbestos management procedures are covered at least annually by these audits. Asbestos is also an agenda item on meetings to allow any issues to be discussed.

The asbestos database will also be interrogated to ensure individual staff within Southwark are also adhering to the regulations and are ensuring risk from exposure is reduced by accessing the properties records where appropriate.

Periodic audits of all processes will be carried out by the asbestos team and the health and safety team in housing services.

12.2 Website proposal

It is currently under consideration that access to information relating to individual properties and communal areas is made available on the Southwark website. This will allow residents and key services to view details of any ACM that may be present.

12.3 Review of this plan

This plan will be reviewed by the Asbestos Coordinator on an annual basis or sooner if significant changes to legislation, guidance or processed procedures are introduced. An audit of this management plan must be undertaken every 12 months, which can be assisted by an independent consultant if required.

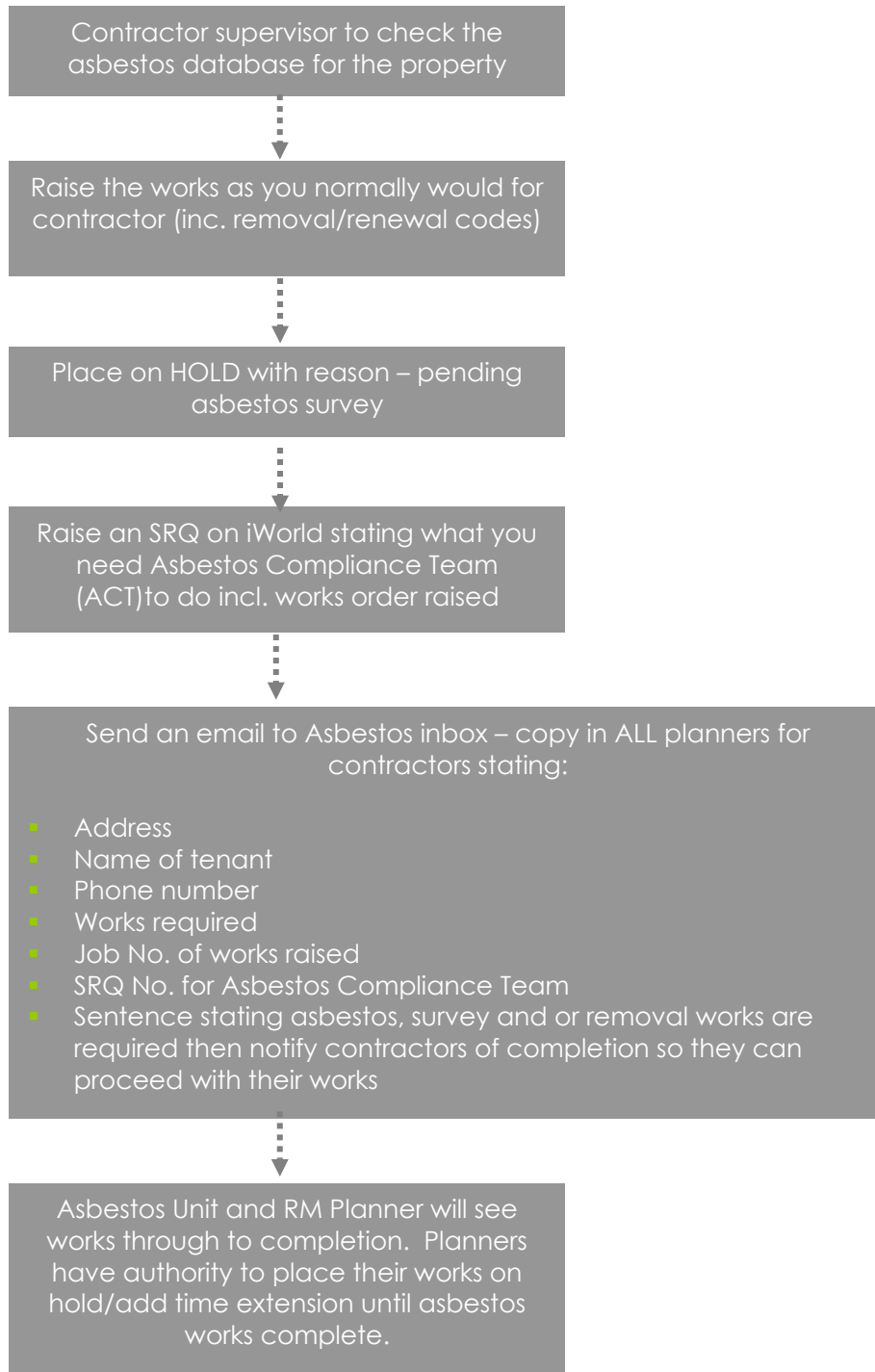
Housing and Modernisation

asbestos management plan

A. Appendices: Procedures - flow charts

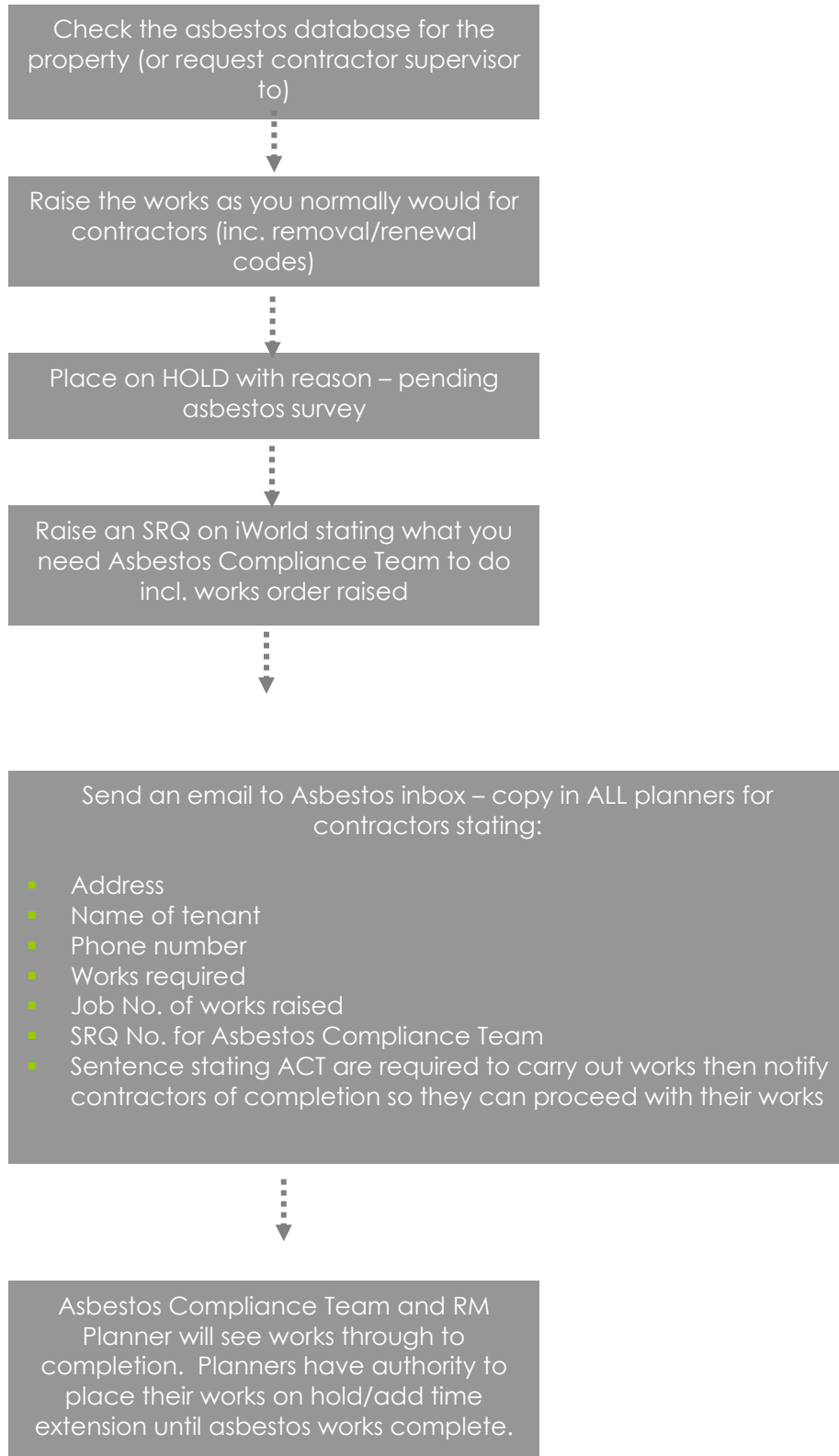
A1 Procedure for customer service centre staff

Repairs raised from follow-on reports and jobs raised by CSC after contractor has checked database.



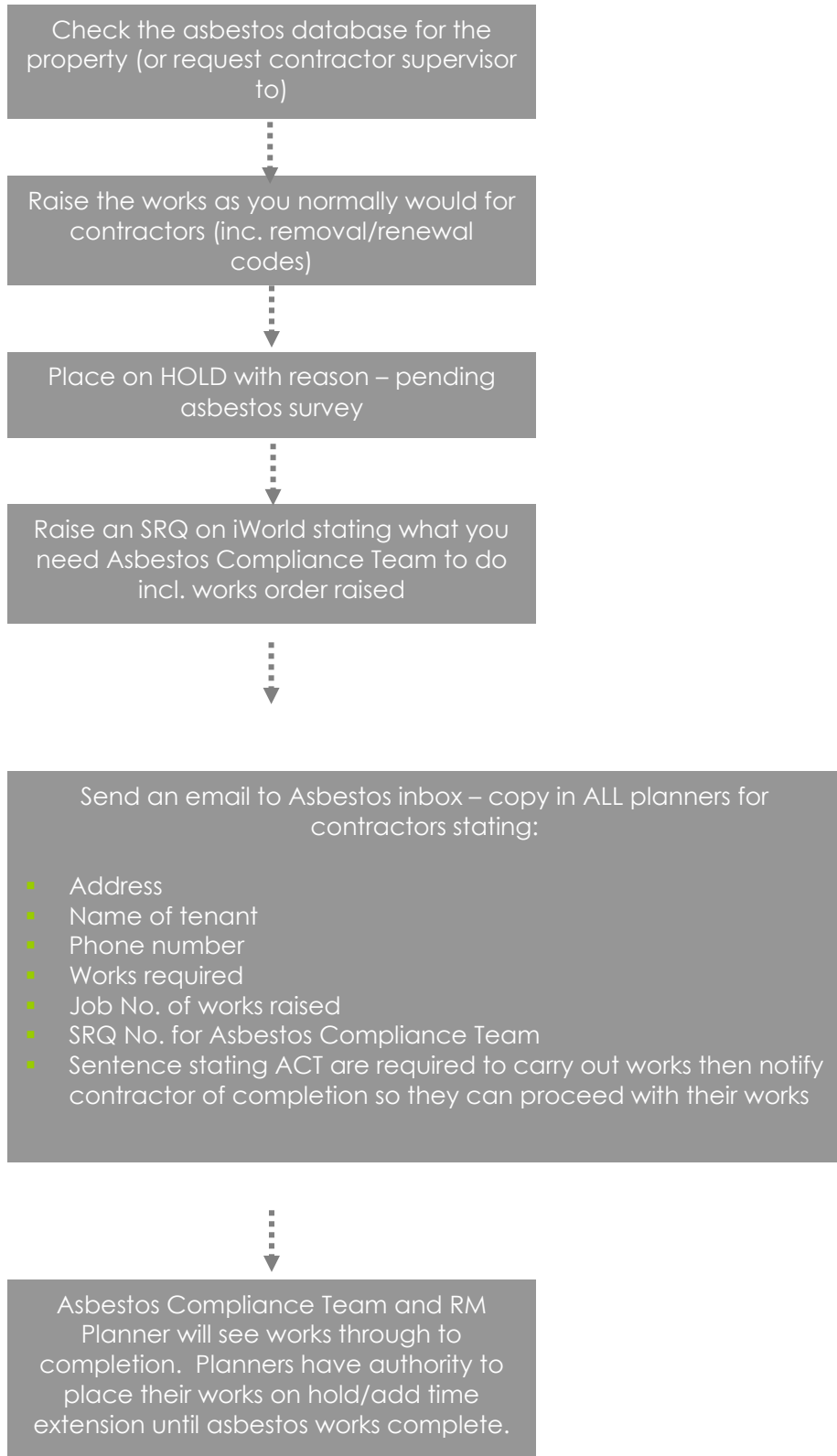
A2 Procedure for area repairs technical officers

Repairs raised following inspections carried out by Technical Officers where TOs suspect material may be asbestos and is damaged or will be disturbed during works.

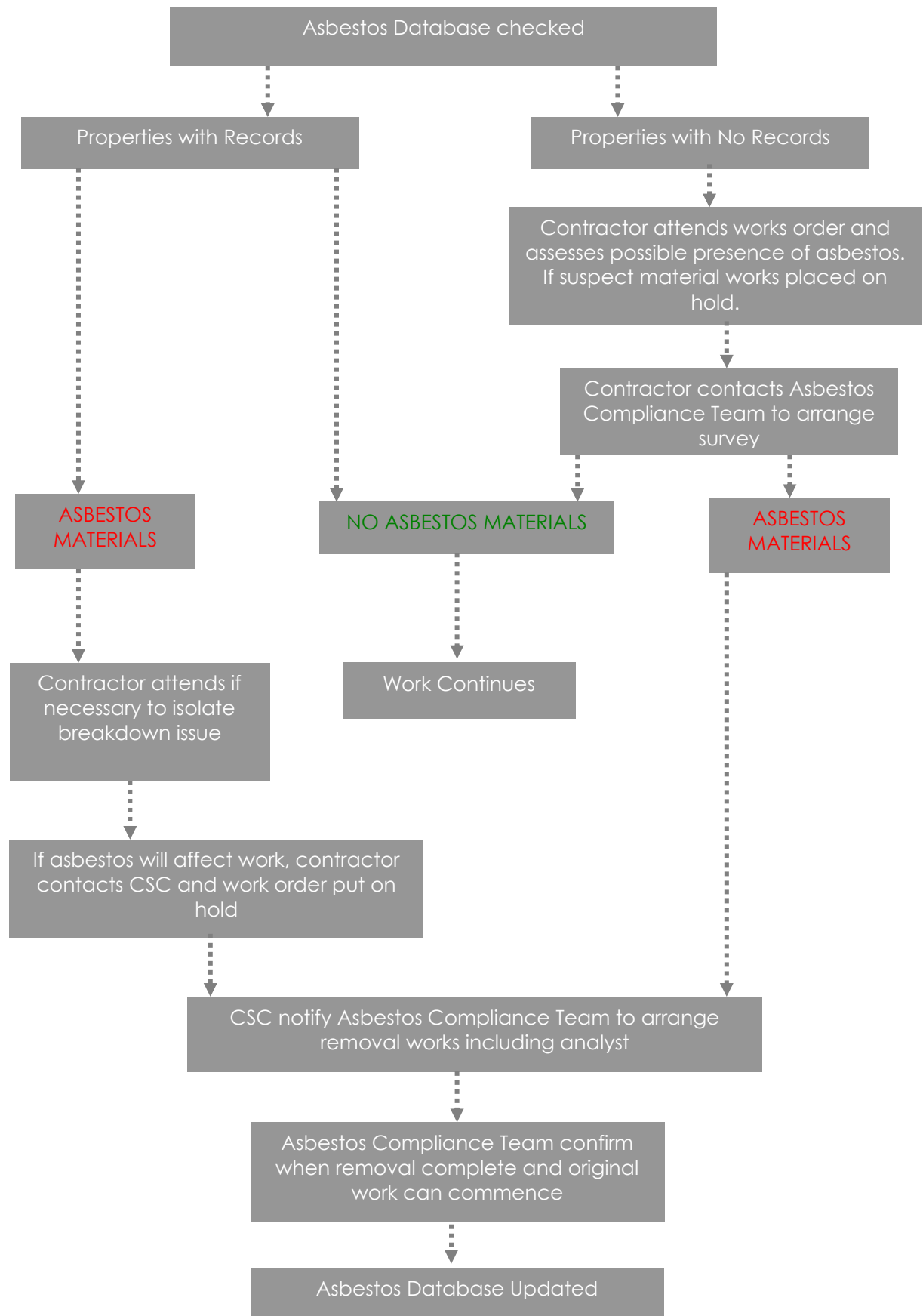


A3 Procedure for contractor planners

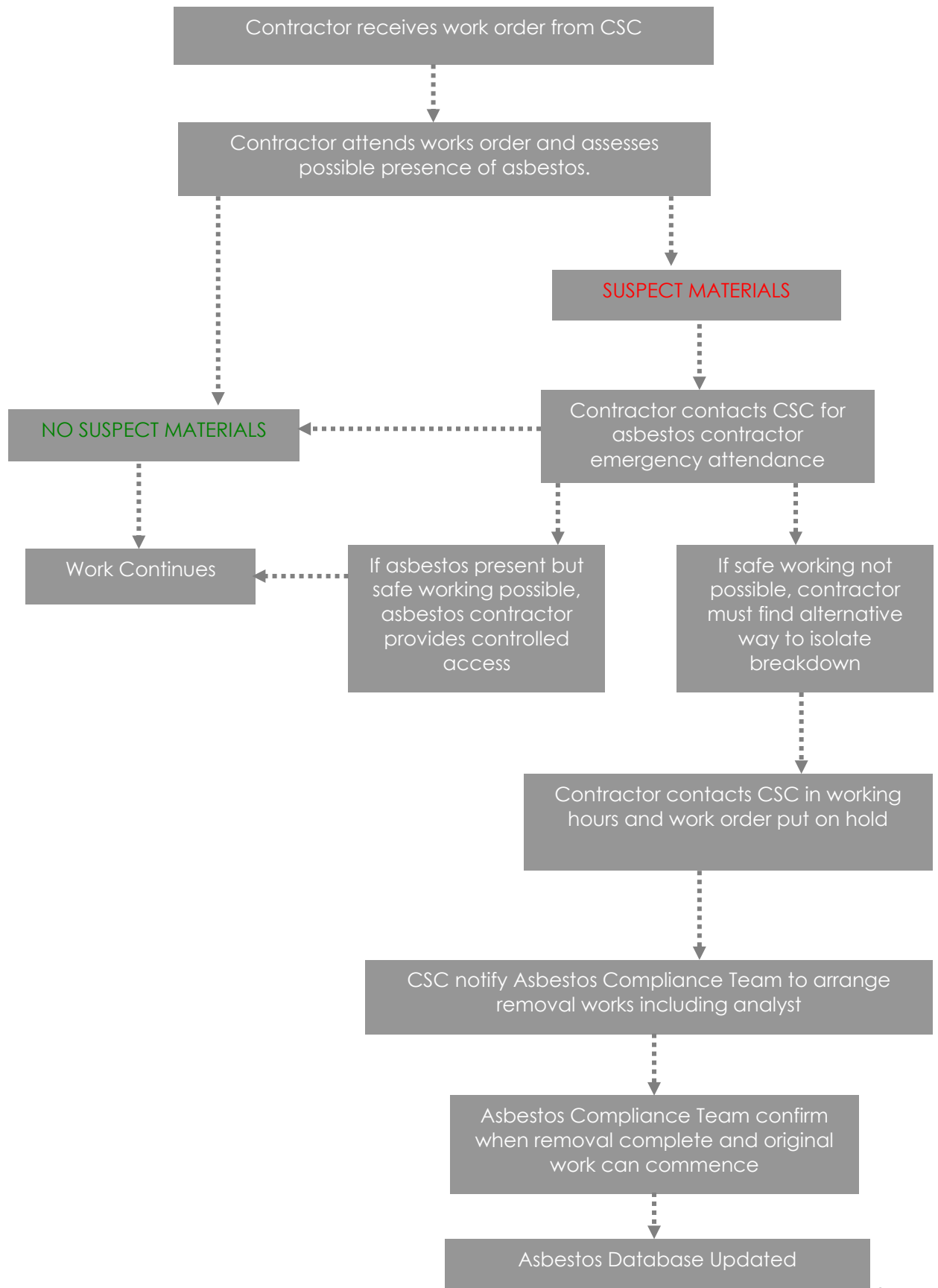
When an operative reports they suspect asbestos present and is damaged or will be damaged during repair.



A4i Procedure for contractors: in-hours work



A4ii Procedure for contractors: out-of-hours work

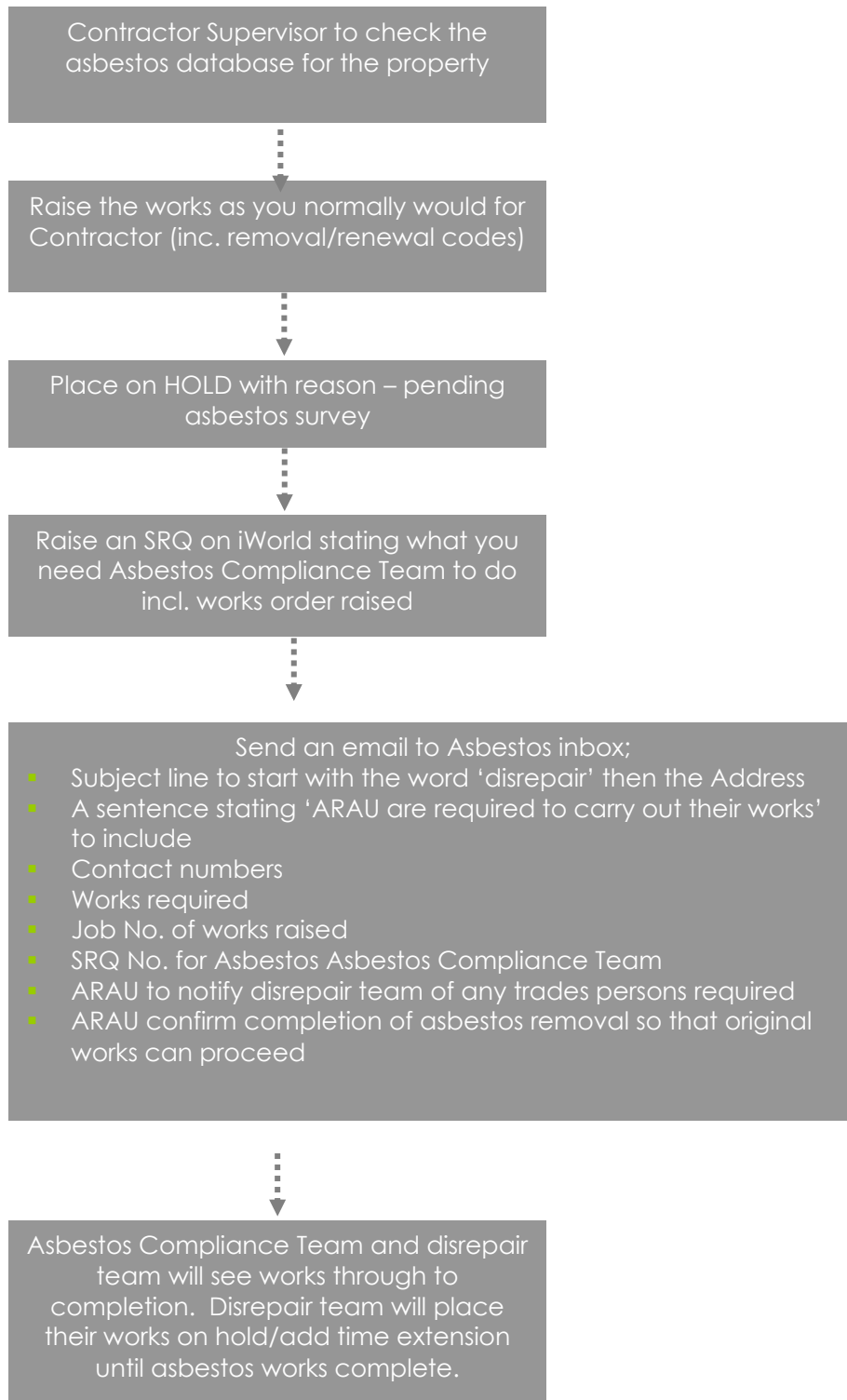


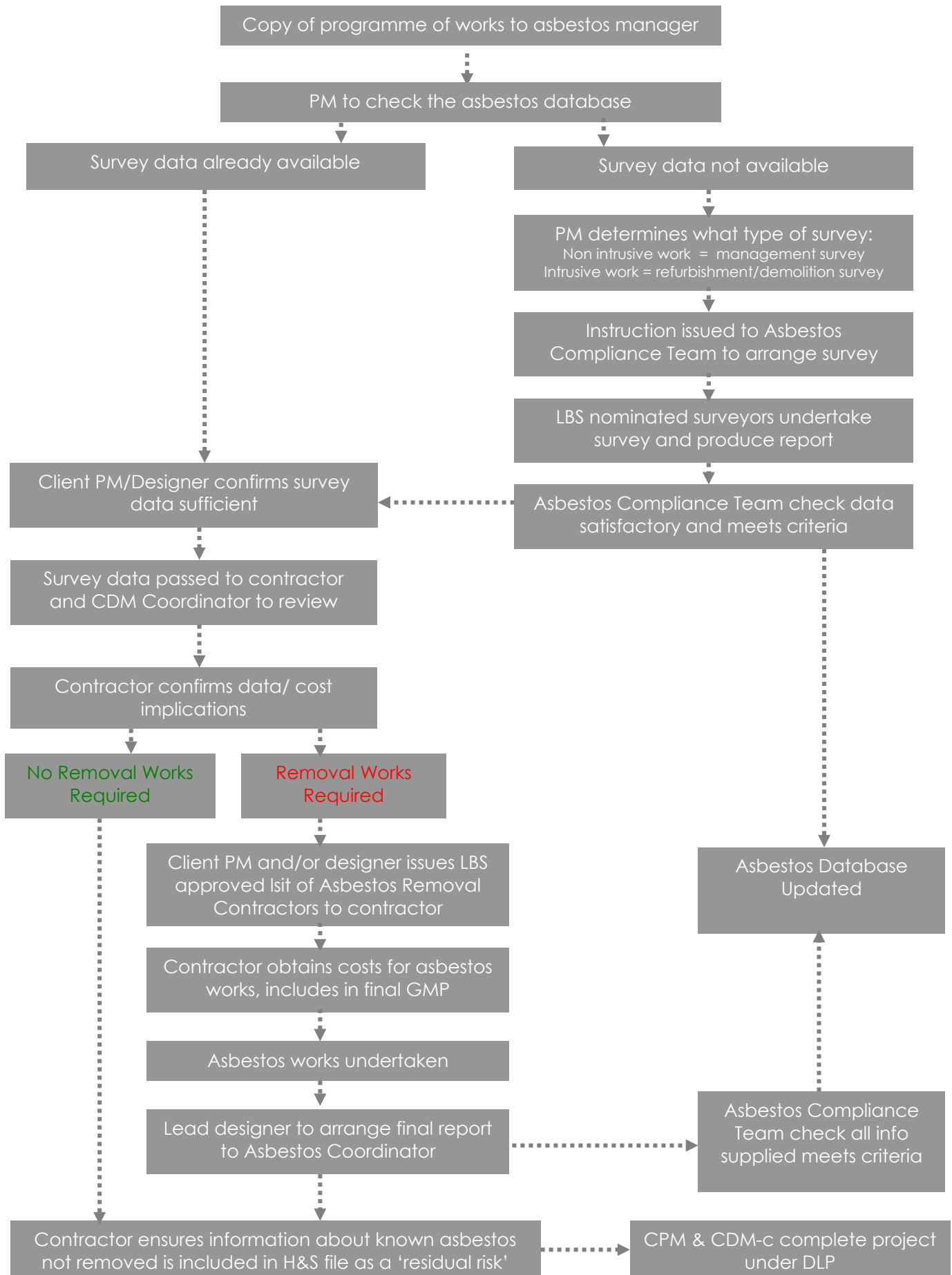
Housing and Modernisation

asbestos management plan

A5 Procedure for disrepairs

Repairs raised from follow on reports and jobs raised by disrepair tem after contractor has checked database.

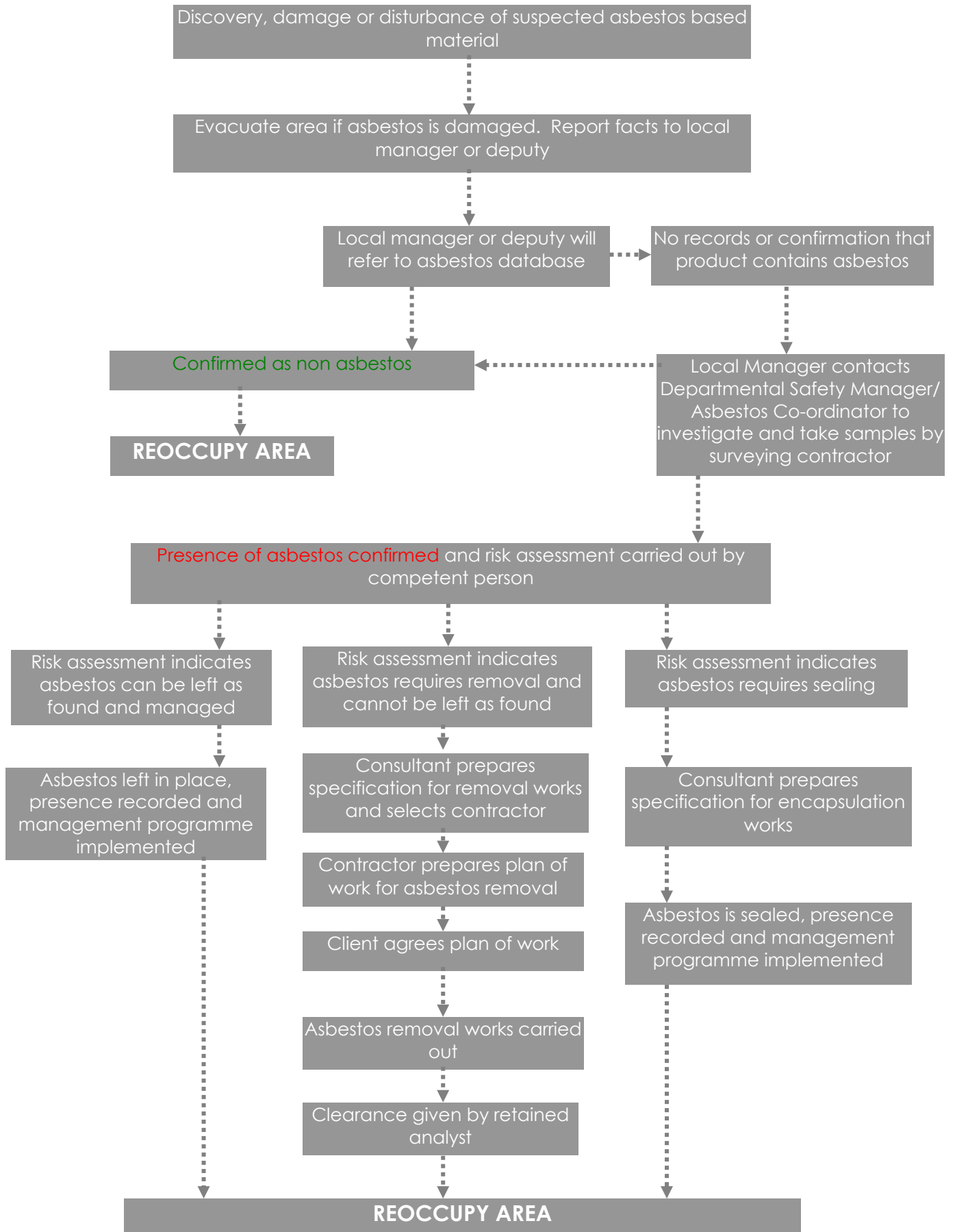




A7 Procedure for surveys for investment project works

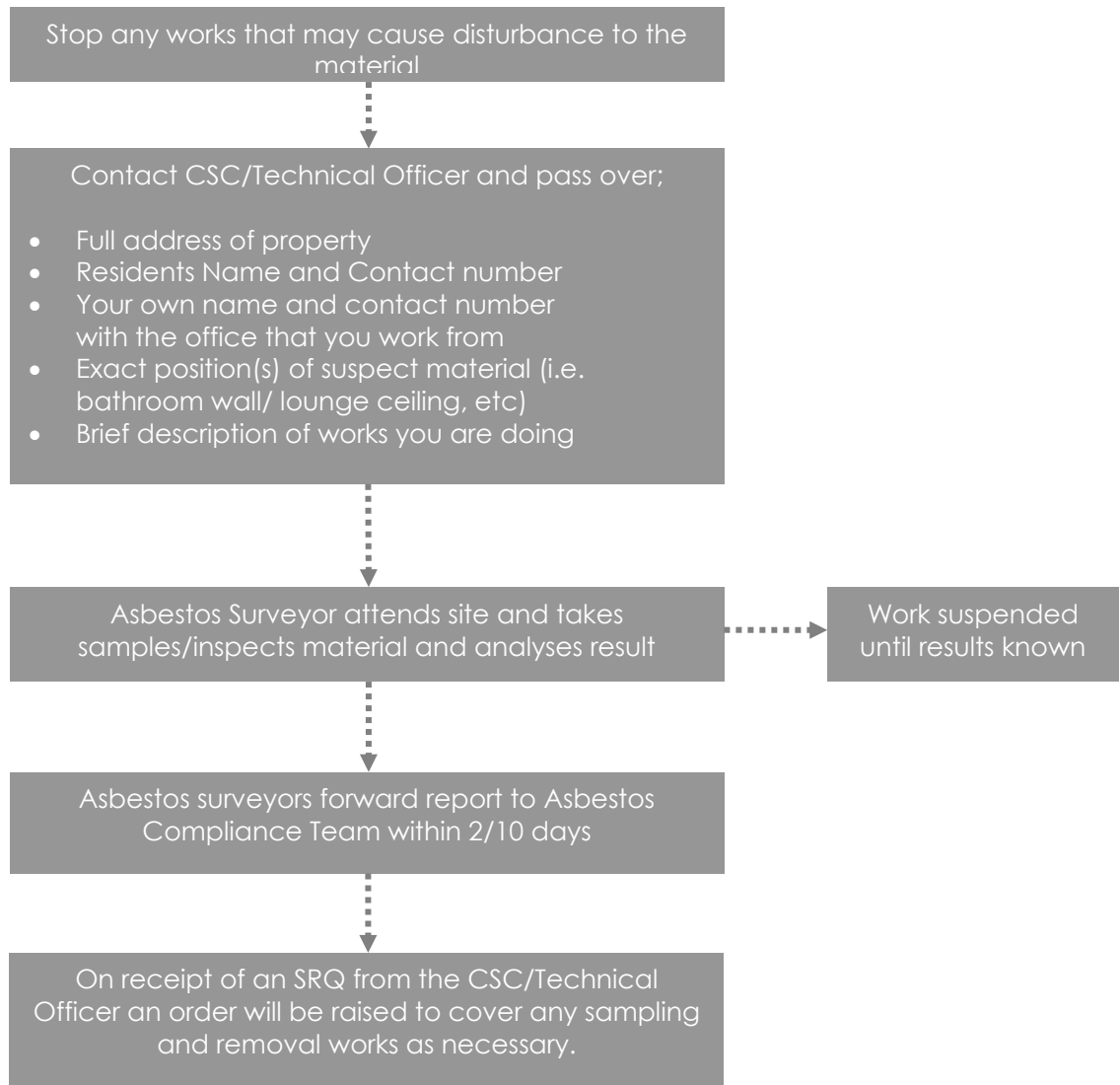


A8 Procedure for emergencies



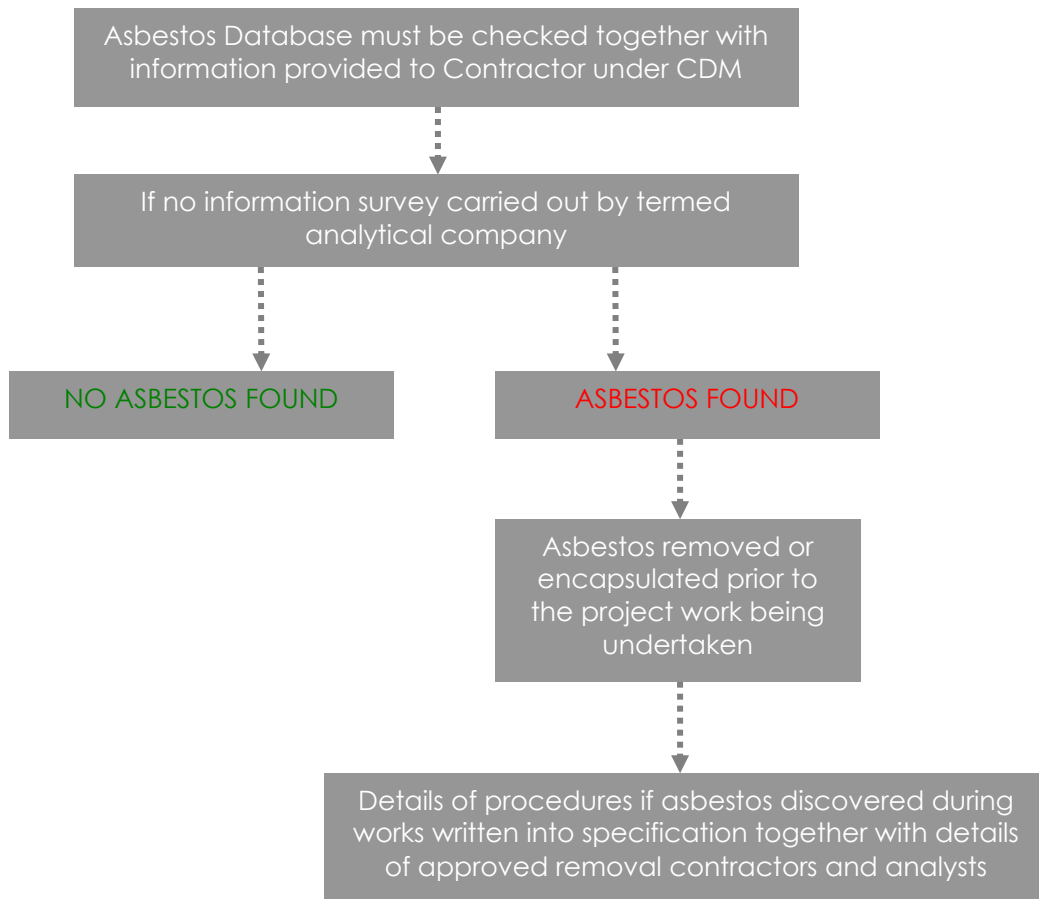
A9 Procedure for the discovery of a suspect material

If you come across a material that may be disturbed or a panel that requires removal and you are unsure whether the material is asbestos or not you should carry out the following procedure;

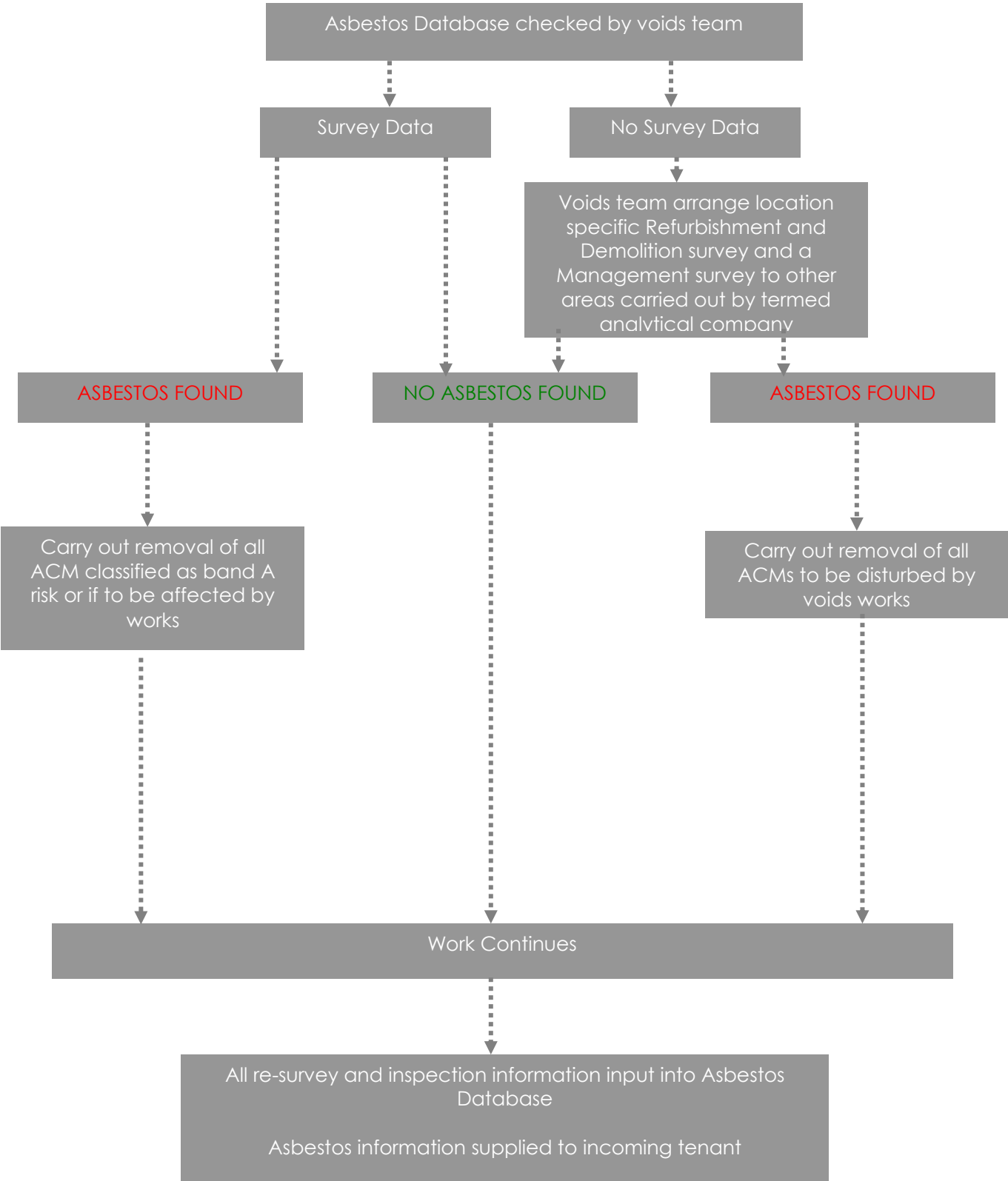


A10 Procedure for one off projects/contracts

Where one –off projects are being undertaken consideration should be given to whether there is any asbestos present at the site where works will be carried out.

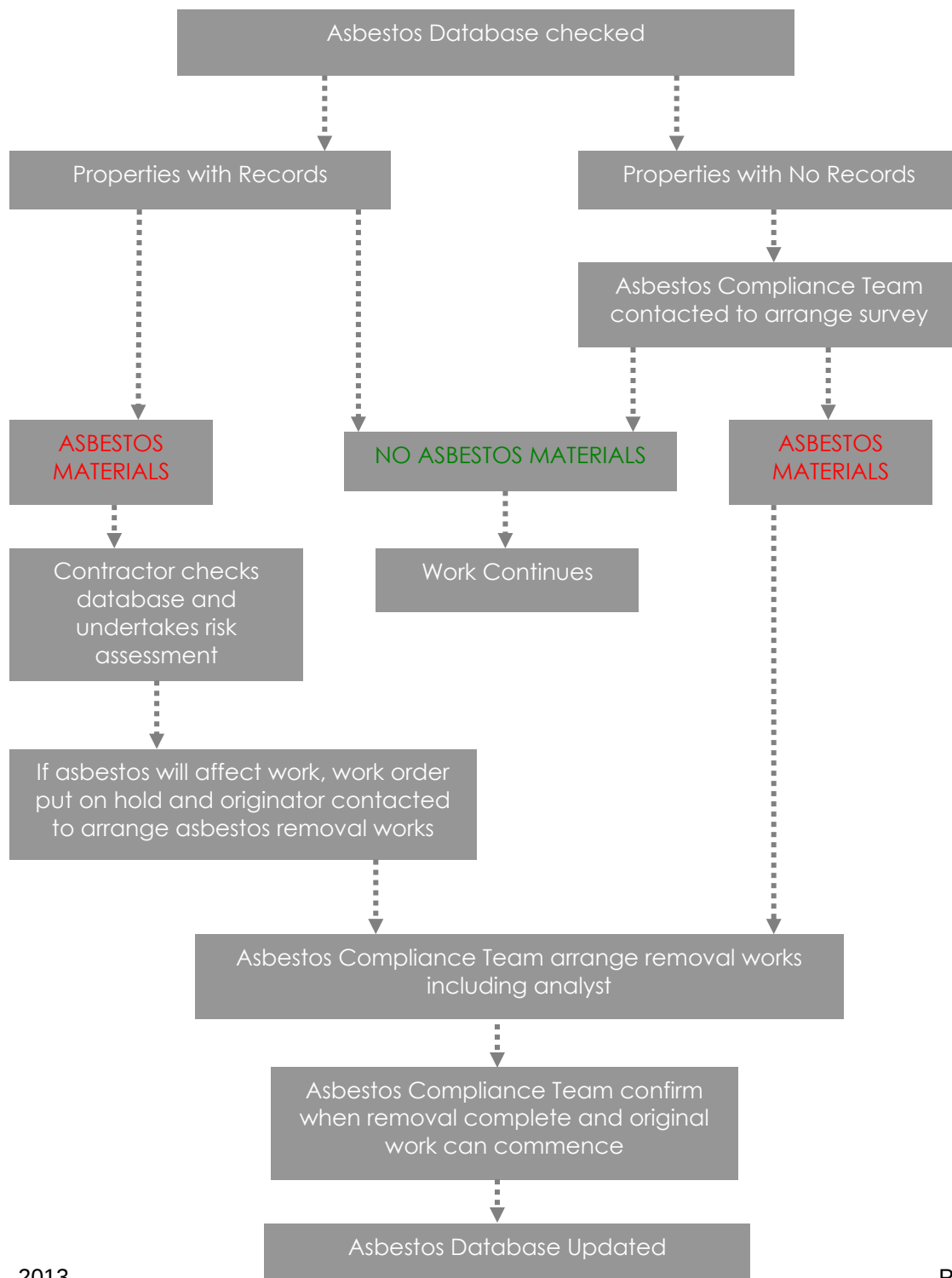


A11 Procedure for empty homes/voids work



A12 Procedure for programmed work

It is the responsibility of the contract administrator/contract manager when tendering a contract to ensure, following consultation with health and safety/asbestos officer, that all contractors are 'asbestos aware' and can demonstrate that their operatives and relevant staff have current asbestos awareness training and planned refresher training. It is Southwark's responsibility to ensure that contractors are made aware, via the asbestos database and/or works orders, of the known/possible locations of asbestos and the procedures to follow if they believe they have come across any asbestos based products.



A13 Procedure for the discovery of damaged material

If you come across a material that has been damaged and you are unsure as to whether the material is asbestos or not, the following procedure is to be adhered to;

