



## IVH Asbestos Management Procedure

### Introduction

Asbestos is the common name for a group of naturally occurring fibrous minerals.

Asbestos-containing materials (ACMs) were used extensively in buildings for a variety of purposes, particularly in construction between 1945 and 1975.

Asbestos-containing materials in various forms are known to pose a risk to health if it is disturbed in a way that releases airborne fibers.

However, if properly managed these risks can be mitigated and controlled. Where ACMs are present, they do not pose a risk to health providing the ACM is in good condition and is not disturbed.

The ill health effects attributed to asbestos are highly researched and documented at both national and international level. In general, it is accepted that asbestos fibers inhaled in any quantity have the potential to lead to life limiting chronic illness.

Where damaged or likely to be damaged ACMs are found they should be totally withdrawn from use and substitute materials installed in their place.

In any place of work or public setting this is managed with the application of the Control of Asbestos Regulations 2012 (Car 2012).

Whilst in domestic settings this is managed through the Defective Premises Act 1972, and various other employment and landlord regulations.

### Aims and Objectives

Irwell Valley Homes (IVH) recognises its responsibility to ensure the safety of its residents, staff, contractors, and visitors. This policy sets out the Associations guiding principles and practices with regards to asbestos management.

IVH, and its respective partners, accepts that due to the age and construction of the housing stock and other buildings it owns and manages there will be ACMs present within the fabric of the buildings (for all buildings constructed before 2000).

IVH also acknowledges the hazards associated with exposure to asbestos and will minimise any exposure to asbestos by adhering to at least the minimum standards in the CAR 2012 and any subsequent revisions.

Aims:

- To comply with the Control of Asbestos Regulations 2012 and other related legislation.
- To ensure that residents, staff, contractors, visitors, and all property managed by the association are safeguarded from the dangers of asbestos fibres.
- To minimise the risk of asbestos exposure within properties managed by the association.

Objectives:

- Demonstrating an appropriate level of commitment to the effective management of asbestos within all the Association's premises.
- Providing a suitable and sufficient allocation of resources to enable the effective implementation of the Association's Asbestos Management Plan.
- To ensure overall compliance with the Asbestos Management plan.
- To ensure that the persons undertaking the managing of ACMs within the Association's properties are competent to do so, through the provision of information, training and supervision as required.

- Ensuring that an annual review of the effectiveness of the Asbestos Management Plan is carried out, considering changing risk and legislative responsibilities.

## Procedure, Strategy.

The full operational procedure is outlined below.

IVH acknowledges that exposure to any asbestos fibres is a potential cause of chronic ill health, and particularly life limiting Mesothelioma (Asbestosis).

Where Asbestos is present in its buildings and assets IVH is committed to reducing the level of risk to the lowest reasonably practicable level, for its colleagues, contractors, customers & anyone affected by its actions.

Regulation 4 of CAR 2012, Duty to Manage, (as opposed to the generality of the Health and Safety at Work (HSWA) etc Act) requires those who have responsibilities for maintenance activities in non-domestic premises (the duty holder) to take all the following actions to prevent fibre release and thereby prevent exposure: -

- Take reasonable steps to find asbestos in the premises and assess the condition of these materials.
- Presume that materials do contain asbestos unless there is strong evidence that they do not.
- Prepare a record of the location and condition of asbestos-containing materials and assess the risk from them.
- Prepare and implement a plan to manage those risks.
- Ensure that ACMs are managed in-situ by controlling maintenance work.
- Prioritise work for those ACMs that require to be sealed, encapsulated, or repaired.
- Safely remove ACMs that cannot be managed in-situ.
- Provide information on the location and condition of the material to anyone who is liable to disturb it; and
- Regularly review the condition of ACMs to ensure that the plan remains up to date.

Even though Regulation 4 does not apply to most domestic premises, there is still some responsibility on the part of the landlord or managing agent, who are employers, to identify (and control) asbestos. Other relevant parts of CAR (e.g., Regulation 5), HSWA, Construction (Design & Management) Regulations (Regulation 10) and/or the Management of Health and Safety at Work Regulations 1999 should be used to ensure that an appropriate asbestos survey, including sampling, is commissioned before building, refurbishment, maintenance or demolition work takes place in any domestic or non-domestic property.

It is not a requirement of the regulations for IVH to remove all asbestos where identified.

However, using a risk management approach IVH must manage ACMs via reasonably practicable means to prevent exposure to asbestos fibres to comply with the regulations.

The process relates to dwellings, offices, general needs, supported housing, sheltered housing, extra care schemes, shops & commercial premises where relevant, other rented properties owned by IVH, communal areas including leasehold properties, other rented properties managed by third parties unless other third parties are explicitly specified for statutory responsibility in the lease or management agreement.

Where properties are managed on behalf of external property owners' statutory responsibility will be detailed in the terms of the management and or lease agreement.

## Performance Reporting

This policy will be reviewed every two years – or more frequently if legislation changes.

It will be updated to reflect:

- Operational and legislative changes.
- Lessons learnt from experience.
- Feedback from employees.

Performance against compliance will be monitored by the Board through their quarterly update report

All asbestos survey information associated with the non-domestic buildings will be formally reviewed by the Compliance Manager.

The asbestos register must be consulted if there are any planned significant changes to the building/scheme and if required, further surveys will be carried out.

## Roles and Responsibilities

The Chief Executive of IVH recognises they are the 'Principal Person' in relation to the management of Asbestos. To help comply with the legal requirements and to ensure that ACMs in premises are properly managed, IVH has identified 'Duty Holders' and 'Appointed Persons' who will be responsible for that management. These are set out in the Operational Process.

Managers are responsible for ensuring that colleagues, contractors, casual workers, and other non-permanent colleagues working in the company are aware of the terms of the process.

All colleagues are responsible for ensuring adherence to the Asbestos Process. A briefing document will be produced for prompting this comprehension (process on a page)

The Executive Director (Homes) and the Executive Director (Customers) will provide advice for managers and all colleagues and will be responsible for administering, monitoring, and reviewing the operation of the process.

All stake holders, staff and contractors are required to co-operate as far as is necessary to enable IVH to comply with the above requirements.

The Duty Holders and Appointed Persons will ensure that IVH colleagues have the necessary resources, skills, training, and authority to ensure that the ACMs are managed effectively.

To comply with CAR 2012, IVH's Duty Holder, in conjunction with the Appointed Person will take all reasonable steps and: -

- Appoint a person to take managerial responsibility.
- Work towards 100% Compliance with relevant legislation.
- Prepare procedures for preventing or controlling the risk of exposure to asbestos.
- Ensure that Contractors who carry out asbestos surveys will be UKAS accredited consultants to ISO 17020 and contractors appointed to measure the concentration of asbestos fibres will be ISO 17025 accredited. All laboratories that sample ACMs will be UKAS accredited.
- Prepare reports for Boards and Committees.

Day to day management of the risks posed resulting from the surveys, follow up on remedial work resulting from the surveys and management of associated consultants appointed by the company will be managed by the Compliance Manager in conjunction with relevant members of other teams as appropriate.

IVH expects all colleagues to take responsibility for health & safety as part of their daily duties. Colleagues should ensure that asbestos risk forms part of any risk assessment when carrying out any type of improvements/changes to the assets in the business. IVH have a wide variety of non-core assets which need to be managed in line with the process, to ensure that any remedial works to the assets take account of asbestos and the management responsibilities.

## Associated Documents and Good Practice

E.g., Internal Policy, External Guidance Documents, relevant legislation. Provide links to the documents and any websites that the good practice/current legislation comes from.

Forms and Procedures: Described but formatted as hyperlinks with the full address/location where they can be found should someone have a printed version of the policy and therefore cannot access the hyperlinks. Irwell Valley Homes affirm that asbestos containing materials (ACMs) have been used in the past within several their buildings, and where installed, if well maintained do not present any appreciable risk to health. However, the hazard of asbestos is recognised, and it is Irwell Valley Home's intention to reduce the exposure of all persons to airborne asbestos when and where it is reasonably practicable to do so. Where there is a statutory obligation, Irwell Valley Homes will comply with all the requirements.

The application of this procedure ensures IVH control the risk of exposure to asbestos, this policy has been produced in accordance with the following.

- The Control of Asbestos Regulations 2012 and the Management of Health and Safety at Work Regulations 1999 impose several duties upon the Association. The parts relevant are.
  - Regulation 4 Duty to Manage
  - Regulation 5 Identification of Asbestos
  - Regulation 6 Assessment of work which exposes employees to asbestos
- Management of Health & Safety at Work Regulations 1999 – duty to complete risk assessments and provide preventive and protective measures.
- Construction, Design & Management (CDM) Regulations 2015 to eliminate and control risks at the design stage of construction, and during construction and refurbishment works.

Other legislation & guidance that affects this policy is

- ACOP L143 – Managing and Working with Asbestos & Other ACOPs
- The Health & Safety at Work Act 1974
- Landlord and Tenant Act 1985
- Defective Premises Act 1972
- Control of Substances Hazardous to Health Regulations 2002 (COSHH)
- Workplace (Health, Safety and Welfare) Regulations 1992
- Hazardous Waste Regulations 2005
- The HCA Homes Standard

The Company must ensure that customers, residents, employees, and visitors to all our premises, both individual homes & offices remain safe from the effects of exposure to asbestos.

Failure to comply with the requirements may result in.

- Prosecution by the Health & Safety Executive under the Health & Safety at Work Act 1974
- Prosecution under Corporate Manslaughter and Corporate Homicide Act 2007
- RSH Serious detriment judgement, resulting in a Governance Downgrade. Leading to a loss of confidence by stakeholders in the organisation
- Damage to reputation of the Company.

## Version Control

Approval Date:	Date Policy was approved by the relevant committee
Approval Body	Where the policy is to go for approval
Implementation Date:	Date the policy is to be implemented – e.g., rent policy is implemented from 1 <sup>st</sup> April, but the Gas Safety policy is implemented the same day as it was approved
Policy Author:	Who wrote the policy – Name and job title
Policy Owner:	Name and Executive Director of ....
Frequency of Review	Annual, every 2 or 3 years or sooner depending on updates to legislation, good practice etc.
Planned Review Date	When the policy is due to be reviewed, unless there is major change in legislation or procedures, then the policy will be reviewed sooner.
EIA (Equality Impact Assessment) Date and Link to EIA	Date of last EIA and a link to the document if applicable
Safeguarding Impact	This will not apply to most policies
Lead Team	Team responsible for implementing the policy

The latest version of this policy should be viewed online from The Hub area of the IVH intranet, and any printed version cannot be relied on as the most current version

## Procedure, Operational

### 1.0 Procedure for the Management of Asbestos Risks

These procedures will form IVH's "Asbestos Management Plan"

IVH will prevent its employees, contractors, sub-contractors, building users and any person to whom it owes a duty of care from respiratory exposure to asbestos fibres from ACMs within its premises so far as is reasonably practicable.

### 2.0 Management of Asbestos Risks Philosophy

IVH will adopt a Safety Management System (SMS) including IVH Safe Systems of Work, Risk Assessments & Method Statements to prevent exposure to asbestos fibres from ACMs.

To achieve this, all premises will be surveyed (in a manner and time as described below) to identify so far as is reasonably practicable the condition and location of ACMs. A risk assessment will be undertaken and continually reviewed, in accordance with HSE documents HSG264 and HSE L143 to prevent exposure. The risk assessment will identify the control and management action that must be employed.

The Executive Director (Homes) is the Responsible Person (Duty-holder) for Asbestos Management, they shall: -

- Ensure that adequate resources are available for the formulation, monitoring and recording of appropriate procedures which comply with HSG264 and HSE L143.
- Ensure that adequate resources are available to provide appropriate information, instruction, training, and supervision to employees identified as having a role to undertake in the implementation of asbestos management procedures.
- Accept management responsibility for all aspects of asbestos management and control.
- Ensure suitable arrangements are in place to identify all properties managed by IVH and assess them for the potential risk from asbestos fibre exposure.

- Establish suitable arrangements to manage identified risk areas, including identification of management responsibilities, training and competence in all colleagues, contractors, and sub-contractors.
- Ensure that adequate resources are available to address any needs identified in the risk assessments and that the risk assessments are acted upon.
- Ensure the review of the Asbestos Procedure, Asbestos Management Plan, and associated risk assessments at least biennially (each 2 years).
- Ensure that the established procedures are brought to the attention of all Managers, Staff, Contractors, Subcontractors, and other persons affected by them.

The Deputy Responsible Person (Duty-holder Day to Day (Client)) is the Head of Asset Management and shall: -

- Ensure that the surveys IVH commission are 'fit for purpose' and meet the organisations requirements as HSG264 box 11.
- Update, improve and approve the contract of service reviews with the agency appointed for asbestos surveys as HSG264 box 11.
- Ensure the arrangement of surveys to be carried out on each property within their remit.
- Ensure all properties that are to have intrusive works (Investment, Intrusive Maintenance or Refurbishment) have a relevant refurbishment combined with maintenance survey.
- Keep permanent records of all surveys in the IVH Asbestos Register (SGS Teams Portal)
- Arrange for remedial, maintenance or removal work to be carried out as highlighted by the surveys.
- Keep permanent records of all the remedial, maintenance or removal work with the surveys in IVH Compliance Register (c365). The records will be readily available for inspection by stake holders. The records and survey data will be actively proffered to all contractors as part of a Health and Safety File prior to works taking place.
- IVH colleagues and IVH assigned Contractors and their Sub-contractors, shall, in undertaking their work activities, comply with this Process and perform their duties in accordance with any information, instruction and training received.

The Head of Asset Management (Duty Holder) shall be supported and assisted in these duties by the Compliance Manager, (particularly the maintenance of the Asbestos Register)

### 3.0 The Estate

- The Estate comprises all properties and buildings owned, managed, maintained, or occupied by IVH and/or its tenants or clients, for which IVH takes responsibility for reactive and planned maintenance.
- Where IVH owned properties are maintained by outside agencies then the Responsible Person – Duty-Holders or appropriate subordinate (Compliance Manager), shall be available, within business hours, to advise the person in control of the building.
- Where IVH colleagues occupy leased properties then the Responsible Person – Duty-holder D2D or appropriate subordinate (Compliance Manager), shall be available, within business hours, to advise the person in control of/managing the colleagues.
- Responsibility for the maintenance and upkeep of the corporate database will lie with the Deputy Responsible Person – Duty-holder D2D (with technical support from the People Tech, & Innovation Team) to ensure the effectiveness and accuracy of the database.
- All requests for asbestos surveys and removal must be made by appropriately qualified, experienced, and trained officers.
- All Surveys requests must be fully and accurately scoped with approved documentation.
- The survey and management process shall be directed and controlled by the Responsible Person – Duty-holder D2D.
- The information collected from surveys will be entered on to an electronic corporate database (IVH Asbestos Register, SGS Teams Portal), which will store and allow analysis for management purposes, of all ACMs.



- The database will be Web enabled and available through Rubixx.

#### 4.0 The Survey Programme Rational

All buildings surveyed before July 2017 are to be fully resurveyed to comply fully with survey methods described in HSG264 as they come up in the below criteria.

- HSE guidance indicates that buildings constructed after 2000 are unlikely to contain ACMs therefore surveys are not required, the data communication will acknowledge this per property.
- All non-housing buildings, whole or part, will be visually inspected annually by the IVH Compliance Surveyors or other appropriate surveyors and colleagues, this will be achieved as far as possible through natural opportunities such as site visits for other purposes.
- All non-housing buildings, whole or part, will receive at least one Asbestos Maintenance Survey by the appointed survey contractor (SGS) over a three-year period starting in April 2024.
- All housing buildings, whole or part, that do not currently have a relevant Asbestos Management Survey (approximately 60% of stock) on them will be surveyed over a five-year period.
- Natural opportunities to survey will be taken, all properties scheduled for investment works, all void properties, all acquisitions of pre 2000 properties.
- Proposed programme is subject to Board approval. (To be developed by the Head of Assets)

#### 4.1 Non-housing (Commercial & Communal)

Q1-4, Year 2023/24 (year 1)

- Review current survey status, ensure all qualifying areas have Management Surveys within the 3-year period/cycle.
- Commission surveys from appointed survey provider for all qualifying areas due to fall from 3-year cycle.
- IVH surveying staff to visually inspect all qualifying areas as part of stock condition programme and other surveying or property attendance activity.
- Compliance team to assess recommendations, materials & risk, and commence remediation works arising, managing this programme through c365.
- Annually review management plan.

Q1-4, Year 2024/25 (year 2) etc.

- Review current survey status, ensure all qualifying areas have Management Surveys within the 3-year period/cycle.
- Commission surveys from appointed survey provider for all qualifying areas due to fall from 3-year cycle.
- IVH surveying staff to visually inspect all qualifying areas as part of stock condition programme and other surveying or property attendance activity through c365.
- Compliance team to assess recommendations, materials & risk, and commence remediation works arising, managing this programme through c365.
- Annually review management plan.

Q1-4, Year 2025/26 (year 3) etc.

- Review current survey status, ensure all qualifying areas have Management Surveys within the 3-year period/cycle.
- Commission surveys from appointed survey provider for all qualifying areas due to fall from 3-year cycle.
- IVH surveying staff to visually inspect all qualifying areas as part of stock condition programme and other surveying or property attendance activity through c365.
- Compliance team to assess recommendations, materials & risk, and commence remediation works arising, managing this programme through c365.
- Annually review management plan.

Year 2026 Onwards

Repeat 3-year cycle

## 4.2 Housing

HSE recommendations suggest that, for asbestos management purposes of domestic housing stock, associations should hold 25%-30% management surveys per property archetype.

To do this effectively the property stock should be divided down by, design, built period, locality, developer, improvement programmes. Further recommendations and legislative compliance suggest that asbestos management data should be current and repeated with some regularity. IVH does not have a clear archetype map to apply these recommendations, to mitigate this it is proposed to acquire full asbestos data across all stock elements over a 5-year period with a 5-year repeating cycle.

Q1-4, Year 2023/24 (year 1)

- Commence accelerated survey programme (500-1300 properties).
- Target properties identified as having intrusive works (investment program) over the year and fill out the annual target by further surveys in the locality of these works.
- Assess materials and commence remediation works arising from surveys.
- Review current survey status, ensure all qualifying areas have Management Surveys within the 5-year period/cycle.
- Commission surveys from appointed survey provider for all qualifying areas due to fall from 5-year cycle.
- IVH surveying staff to visually inspect all qualifying areas as part of stock condition programme, void inspection process and other surveying activity
- Compliance team to assess recommendations, materials & risk, and commence remediation works arising, managing this programme through c365.
- Annually review management plan.

Q1-4, Year 2024/25 (year 2)

- Maintain accelerated survey programme (500-1300 properties).
- Target properties identified as having intrusive works (investment program) over the year and fill out the annual target by further surveys in the locality of these works.
- Add properties with survey data 3-5 years old and additionally survey within locality.
- Assess materials and commence remediation works arising from surveys.
- Reassess ACMs and commence works arising from surveys.
- Review current survey status, ensure all qualifying areas have Management Surveys within the 5-year period/cycle.
- Commission surveys from appointed survey provider for all qualifying areas due to fall from 5-year cycle.
- IVH surveying staff to visually inspect all qualifying areas as part of stock condition programme, void inspection process and other surveying activity
- Compliance team to assess recommendations, materials & risk, and commence remediation works arising, managing this programme through c365.
- Annually review management plan.

Q1-4, Year 2025/26 (year 3)

- Maintain accelerated survey programme (500-1300 properties).
- Target properties identified as having intrusive works (investment program) over the year and fill out the annual target by further surveys in the locality of these works.
- Add properties with survey data 3-5 years old and additionally survey within locality.
- Assess materials and commence remediation works arising from surveys.
- Reassess ACMs and commence works arising from surveys.
- Review current survey status, ensure all qualifying areas have Management Surveys within the 5-year period/cycle.
- Commission surveys from appointed survey provider for all qualifying areas due to fall from 5-year cycle.
- IVH surveying staff to visually inspect all qualifying areas as part of stock condition programme, void inspection process and other surveying activity



- Compliance team to assess recommendations, materials & risk, and commence remediation works arising, managing this programme through c365.
  - Annually review management plan.
- Years 2026 Onwards (years 4&5, ten repeat 5-year cycle)
- Maintain accelerated survey programme (500-1300 properties).
  - Target properties identified as having intrusive works (investment program) over the year and fill out the annual target by further surveys in the locality of these works.
  - Add properties with survey data 3-5 years old and additionally survey within locality.
  - Assess materials and commence remediation works arising from surveys.
  - Reassess ACMs and commence works arising from surveys.
  - Review current survey status, ensure all qualifying areas have Management Surveys within the 5-year period/cycle.
  - Commission surveys from appointed survey provider for all qualifying areas due to fall from 5-year cycle.
  - IVH surveying staff to visually inspect all qualifying areas as part of stock condition programme, void inspection process and other surveying activity
  - Compliance team to assess recommendations, materials & risk, and commence remediation works arising, managing this programme through c365.
  - Annually review management plan.

### 4.3 Types of Asbestos Survey

IVH historically commissioned two types of asbestos survey: Management Asbestos Surveys and partial property Refurbishment and Demolition Surveys. IVH currently commission, full property Management Asbestos Surveys with targeted Intrusive Refurbishment and Demolition Surveys (Specified Scope) in areas of planned intrusive works or known areas of concern (based on architype)

The Executive Director (Homes), and the Head of Asset Management, as part of their duties (2.0) ensure that all Heads of service and all commissioning managers shall follow this process.

#### Management Asbestos Survey

This is the “standard” survey type, usually undertaken to produce an asbestos register for management purposes (compliance with Regs 4 & 6 of CAR 2012 and all other relevant legislation). It is a non-destructive, limited intrusion method and therefore should not pose a problem to tenants or building occupants.

Representative samples are taken of materials with the potential to contain asbestos and analysis of these samples confirms the presence or absence of asbestos.

This type of survey covers all areas that tenants are likely to encounter, during everyday life, without causing excessive delays to the surveyor or damage to the building.

Any materials not clearly listed in the report must be presumed to contain asbestos.

#### Refurbishment/Demolition Asbestos Survey (Specified Scope)

This is a selectively intrusive survey where the extent of intrusions is informed by the scope of the intrusive work to be undertaken and should be done prior to that work.

The surveyor will be guided by a IVH scoping document based on the work plans that define the extent of work in any area.

The survey will be limited to that required to allow a project to go ahead.

All other parts of the property are to have a full property Management Survey.

It is cautioned by HSE that the surveys cannot be carried out in occupied areas (tenanted properties), in practice, it is usually possible to isolate individual rooms and carry out limited intrusions into service boxing and voids.

For project works, it is required by HSE to use similar house types to build up a body of information about asbestos content in each type of house, rather than individual properties.

IVH has relied on using refurbishment surveys carried out in void properties in the past, to produce a list of possible asbestos types within the property archetype involved.

However due to very strong vernacular constraints of local planning and the long periods of sustained property maintenance, it is very difficult to establish clear archetypes in the IVH stock.

For the purposes of IVH information gathering for the Asbestos Register and for worker safety this Asbestos Procedure instructs this type of survey prior to major works in all properties in the work plan.

Based on guidance on this in HSG264 Asbestos: The Survey Guide.

IVH do not typically commission the following survey type

Pre-Demolition Asbestos Survey

This is a fully intrusive survey of the entire building. It is destructive and will damage the integrity of the building fabric and furnishings. Generally, a full demolition survey cannot be carried out in an occupied (tenanted) property. It may be possible to carry out a demolition survey on parts of a building where only limited demolition is required, for example, to an extension or outbuilding. Occupied parts of a building (furnished) cannot be subjected to a full demolition survey safely.

## Day to Day Management

### 5.0 Non-Housing Assets / Sheltered and Multiple Housing Schemes

IVH has identified a Duty Holder for each of its buildings. The Duty Holder will be responsible for administering the access to, and for preventing unauthorised works to ACMs within his or their premises. The Duty Holder shall ensure that all contractors arriving on site to complete works sign the 'site declaration' (electronic form), to be stored in the Asbestos Register, prior to the commencement of work. **(First touch enabled)**

All commercial, communal, or publicly accessible buildings (whole or part) and all areas where IVH employs people in work activity require annual asbestos re-inspections and a management survey within each 3-year period.

All domestically occupied buildings or parts of buildings require an Asbestos Management Survey within the 5-year rolling program.

The building Duty Holder will NOT (in this role) be empowered to instruct others to survey, repair or remove ACMs. This duty is essential for the effective maintenance of an accurate corporate database. Those Duty Holders are as follows.

- Leased or owned IVH office premises, Facilities Manager.
- Leased or owned IVH stores and operations depots, Head of Repairs and Estate Maintenance.
- IVH owned and managed Sheltered Housing Schemes, Head of Independent and Community Living
- IVH owned and managed communal areas in General Needs Estates, Compliance Manager.

### 5.1 Housing **Include the outputs, what happens when it's removed or encapsulated!**

IVH will identify the Executive Director (Customers) and the Executive Director (Homes) (or appropriate subordinates) as Duty Holders for each and all its general needs housing buildings. The Duty Holders will be responsible for administering the access to, and for preventing unauthorised works to ACMs within IVH premises. The Duty Holders (or appropriate subordinate) shall ensure that all contractors, prior to arriving on site to complete works, have signed a 'site declaration' (electronic form) to be stored in the Asbestos Register, and prior to the commencement of any work or groups of work forming part of an investment program or ongoing maintenance.

The Asbestos Register System in respect of housing properties (this includes individual dwelling within schemes) will include for each property.

- The provision to the contractor, at the time of ordering works, individual asbestos survey sheets, with a requirement to return a signed acknowledging declaration, (site declaration Electronic),

these will be retained by the Deputy Responsible Person – Duty-holder D2D as part of the Asbestos Register System.

- IVH shall make available the data contained in these sheets electronically (or hard printed copy where appropriate) to the contractor.
- All internal teams to receive hard copy or electronic site packs prior to all refurbishment and void property works.
- All high and medium risk recommendations made within an asbestos survey will be the responsibility of the commissioning manager to resolve.
- It will be the duty of all commissioning officers to ensure records of, asbestos removal, asbestos repair, asbestos encapsulation is correct and thorough and submitted to the compliance manager. A records of asbestos waste transit must also be submitted.

The Executive Director (Homes), and the Head of Asset Management, as part of their duties (2.0) ensure that all Heads of service and all commissioning managers shall follow this process.

## 6.0 Survey Philosophy

IVH will ensure that all buildings constructed before 2000, which are owned or occupied by employees, tenants, building users or persons to who IVH owe a duty of care receive a Management Survey as detailed in HSG264.

All non-housing buildings or communal areas of schemes, constructed before 2000 and known to contain asbestos will be inspected annually (by IVH surveyors) the priorities for each building will be assessed based on building use, age and previous asbestos information held by IVH. Full Management Asbestos Surveys shall be undertaken within any three-year period.

All housing buildings, constructed before 2000, will be surveyed (management survey with targeted refurb survey if required) either as they become void, as they fall due under the survey programme or when planned maintenance or asset investment activities are planned or when tenant alterations are approved.

All the data collected will be recorded within IVH's corporate database and made available to Duty Holders for each of its buildings (SGS Teams portal, c365, RUBIXX) The position of ACMs will be accurately referenced and made available for reference purposes. Discrete labelling will occur in communal and commercial areas.

The database will record both positive and negative ACM samples (non-asbestos materials).

For positive samples the material and priority risk assessment, as detailed in HSE L143, will be completed. Thus, the management and control measures for each ACM can be established.

## 6.1 Action to be taken when a building is being acquired

During the negotiations for the property acquisition, and where the fabric of the building is older than 2000, the presence of Asbestos will be considered, this includes development programmes or acquisitions involving older structures.

When premises are surveyed with a view to IVH acquiring them, the survey is to incorporate a statement regarding the availability of an up-to-date Asbestos Register detailing the extent and location of any ACMs within the property.

As survey reports are not necessarily consistent in quality, the accuracy of these documents is not to be wholly relied upon.

If a Report is not available, or the reliability of the register is in any doubt, an asbestos survey of the premises must be commissioned, before proceeding to acquire the property,

An account will be taken of the findings of the asbestos survey and associated cost liability.

If the building contains ACMs but they are not considered to be in a hazardous or in a potentially hazardous condition, it may, after careful consideration, be decided to proceed to acquisition without removal.

Provision must be made for the future monitoring and management of the asbestos via addition to the IVH Asbestos Register and for non-domestic properties, to the Management Plan.

## 6.2 Disposal of Premises

When premises are to be disposed of (including 'right to buy' / 'right to acquire' applications), the Asbestos Management Responsible Person (or appropriate subordinate) must be informed. The person responsible for the disposal of the premises will then be given information on the location and extent of any known ACMs on the premises and the location of the current Asbestos Survey Report and Register information.

No warranty as to the accuracy of the information contained in the Report can be given.

When a domestic or commercial property is assigned a new tenant then the current Asbestos Register information must be included in any handover pack or documentation in an appropriate format.

## 7.0 Material and Priority Risk Assessments

Each Asbestos Survey shall include a material assessment and priority assessments.

The material assessment looks at the type and condition of the ACM and the ease with which it will release fibres if disturbed.

The priority assessment looks at the likelihood of someone disturbing the ACM.

When combined, these variables will assist in determining the potential of the material to release asbestos fibres and are used to produce a risk assessment summary from which a statement of risk is obtained. High, Medium, Low and Very Low risk.

From this a summary management action will be instigated:

- **HIGH RISK** - Remove – These are ACMs in condition or location which requires urgent action which will result in the removal of the material.
- **MEDIUM RISK** - Repair / Encapsulate / Enclose – These are ACMs in a condition or locations which require some remedial action, likely to be minor repairs then once complete would then be managed as below.
- **LOW AND VERY LOW RISK** - Manage – These are ACMs in a condition and or location which does not give rise to a health risk provided the materials remain undisturbed.

Management options available are detailed above and reference is made to HSG 227 appendix 5 in making those decisions.

## 8.0 Intrusive Works

Intrusive works are works that would typically be carried out by, but not exclusively restricted to,

- electricians,
- plumbers,
- carpenters,
- builders,
- IT and telecoms contractors,
- heating engineers.

Contractors carrying out intrusive work should preferably be taken from the IVH's Approved Contractor Framework.

IVH Managers or officers commissioning intrusive works (CDM Client) must include available asbestos information (or note its absence and commission prior to works starting) as part of the pre-construction phase property information.

All Principal Contractors (or contractor if only one) shall include all asbestos information within the site details and construction phase plan.

Where works are proposed, and it is possible that the work area could contain concealed ACMs, the Responsible Persons (Duty Holder Day to Day) or Project Manager must request an intrusive Refurbishment survey by the IVH's Environmental Consultant, prior to proceeding (with Management Survey to all other areas).

It should be noted that following this survey there may be a requirement for some "making good", which will need to be allowed for in feasibility studies or project budgets.

## 9.0 Major Works

A Refurbishment and Demolition survey as defined in HSG264 shall be undertaken prior to the commencement of any major works, including specifics in voids, investment work, refurbishments and demolition, development of existing building structure pre-dating 2000.

The cost of the survey and any ACM removal and associated monitoring works will be included within the overall project budget.

IVH's Environmental Consultant shall be employed to monitor the removal works with all the relevant data being recorded for entry upon the Asbestos Register.

The Responsible Persons will arrange for the project management of all works to ACMs, this includes surveys, repair, or removal.

All asbestos related works will be monitored by IVH's Environmental Consultants and carried out by contractors from IVH's approved list of HSE licensed contractors.

In respect of licensable Asbestos Removal works and Notifiable Non-Licensable Asbestos Removal works a fourteen-day notification shall be given to the HSE, as directed by the licensed asbestos removal contractor,

All asbestos waste (from notifiable and non-notifiable removal or intrusive/damaging works) will only be removed from site by suitably licensed waste operators for disposal at appropriately licensed disposal sites, all disposals will fully comply with the hazardous waste regulations with the associated consignment notes being passed to IVH and retained on the asbestos register.

All associated documentation must be forwarded to the Compliance Manager for entry upon the asbestos register.

## 10.0 Records

All documentation relating to work undertaken on asbestos within the IVH's building stock must be copied to the Compliance Manager for entry to the asbestos register.

It is important to note that this instruction applies to any individual acting in any capacity, regardless of employer.

It is of paramount importance that a central up to date Asbestos Register is maintained for each building (SGS Teams Portal).

The Compliance Manager will ensure that all documentation received in relation to asbestos works is archived indefinitely.

This must include the following:

- Asbestos Contractor Notification Forms (for licensed or Notifiable Non-Licensed Work).
- Certificates of Re-occupation (for licensed work).
- Completion Certificates (for non-licensed work).
- Hazardous Waste Consignment Notes.

The Health and Safety Manager shall ensure the People Resources team shall retain records of reported employee exposures to asbestos, and that exposed colleagues shall receive appropriate annual Health Checks.

Note: CAR2012 gives guidance in relation to retention periods for health and medical surveillance records (Regulation 22).

## Use of Contractors

### 11 Specialist Contractors (Licensed for Work with Asbestos)

For asbestos related work, licensed asbestos removal contractors shall be selected from the IVH approved list and assigned for an agreed period through a tender process to be arranged by the Responsible Persons

All Licensed Asbestos Removal Contractors (LARCs) appointed by IVH (or subcontracted by a third party) to undertake work on behalf of IVH must operate in accordance with these Asbestos Procedures.



LARCs should either be a member of a recognised trade association or must be able to display a history of competency audits by an unaffiliated external body appropriately trained and qualified to carry out the task.

Unless otherwise stated in pre-contract documentation, all LARCs are appointed directly by IVH for an agreed period by a tender process to be arranged by the Responsible Persons and as such their performance will be subject to the scrutiny of the Responsible Persons.

By undertaking work for IVH, the LARC accepts at any time, subject to appropriate assessment, an appointed auditor may enter a live asbestos removal site to assess competency.

The Responsible Persons also may undertake an audit of LARCs, looking at competency, cleanliness, safety, and behaviour.

LARCs are always expected to work in accordance with their company procedures and method statement / plan of work. The Responsible Persons may at any time ask for records of compliance to be presented.

## 11.2 Unlicensed Contractors

All contractors appointed by IVH (or subcontracted by a third party) to undertake work on behalf of IVH must operate in accordance with this Asbestos Procedure.

Contractors who do not hold a license for asbestos removal must not undertake licensable asbestos work or notifiable non licensable asbestos work.

Prior to undertaking work for the IVH all contractors must assess whether their works are liable to disturb asbestos containing materials.

When contractors cannot categorically confirm their works will not disturb asbestos containing materials, works must not commence until further investigation is undertaken. This further investigation may involve requesting and evaluating existing information and / or commissioning project specific asbestos surveys.

Unlicensed contractors must not undertake any works liable to disturb any asbestos containing material unless the Responsible Persons, or an external laboratory approved by IVH confirms the work methods proposed and level of staff training is acceptable and compliant with all relevant asbestos legislation.

All other contractors for non-asbestos related work will be required to demonstrate to IVH that category A asbestos awareness training is provided to all their staff appropriate to their role within the company.

Certification must be from a company registered with the Independent Asbestos Training Providers (IATP) or United Kingdom Asbestos Training Association (UKATA).

## 12.0 Emergencies and Exposure

In the event of an incident suspected of exposing colleagues or building users to an asbestos fibre release, the area is to be isolated and all persons that have not been exposed and without the appropriate personal protective equipment shall be excluded.

Any person exposed to asbestos fibres above the designated action levels will receive the appropriate annual health surveillance.

## 13.0 Training Provisions

All relevant IVH staff will receive asbestos awareness training or other training, appropriate to their duties, including refresher courses as required (typically triennially).

Staff with higher levels of Asbestos Responsibility shall receive BOHS P 405 Asbestos Management in Buildings training.



## 14.0 Audit and Review Process

The Asbestos Management Procedure will be reviewed at twenty-four monthly intervals, or sooner following changes to asbestos legislation.

HSE guidance or approved codes of practice, any other significant change and in the event of a major failure of the management system.

In addition, IVH will undertake a formal audit at least every three years. This will be undertaken using an external specialist who will, provide information on the effectiveness of the current procedures and those areas where change is required owing to revised legislation or to improve the asbestos management process within IVH.