

Asbestos Safety Policy

Version: 2

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1. Background

Connect Housing manages in the region of 3,000 tenanted properties. Asbestos containing materials (ACMs) within blocks and present in individual dwellings within the housing stock need to be identified through survey, risk assessed, and managed in order to keep them safe for use.

This policy explains how Connect Housing's commitments to asbestos safety will be met. It will be supported by an Asbestos Safety Management Plan providing more detailed guidance and procedures.

2. Objectives of the Policy

As a Landlord and Employer, Connect Housing is responsible for meeting all its statutory obligations. In addition, as a Landlord and provider of Social Housing, it must meet the Regulatory Standards contained within the Regulator for Social Housing's [Regulatory Framework for Social Housing](#).

A key objective of this Policy is to describe how Connect Housing will meet the required statutory, contractual and regulatory requirements in relation to asbestos safety.

In addition, Connect Housing must undertake a monitoring role to ensure that it is able to demonstrate a validated landlord compliance position, and in doing so, can provide assurance to other 3rd Parties that statutory and regulatory standards are being achieved.

Further objectives of this policy are detailed below:

- Provide clear lines of responsibilities for the management of asbestos.
- Form part of Connect Housing's wider organisational commitment to health and safety as set out in its Health and Safety Policy.
- To ensure that all persons involved with the survey, risk assessment, air testing, and the implementation of remedial actions associated with asbestos are properly trained and accredited.
- Provide a commitment to customers who are affected by asbestos safety to communicate and raise awareness regarding the key issues.
- Encourage customers, through the provision of publicity information, to allow access to carry out Asbestos Surveys, Air Tests and associated remedial works which will contribute to their own safety.

- Put in place quality assurance and performance management arrangements to ensure that we are delivering excellent services to our customers.
- To provide a timetable for the review of the Asbestos Safety Policy
- Provide a service that recognises the diversity of our customers as well as being inclusive and respectful.
- To ensure Connect Housing provide a safe environment for customers, colleagues and third parties to live and/or work

To manage asbestos safety, and comply with the requirements of CAR 2012, Connect Housing will:

- Complete appropriate asbestos surveys within all communal /common areas and places of work.
- Undertake a planned programme of Asbestos Management Surveys (as a minimum) within all the domestic housing stock which it manages or is under its control.
- Within communal /common areas and places of work, develop a re-inspection programme, appropriate to risk, to control and manage ACMs where they have been identified
- Apply the principles of CAR (2012) to safely manage asbestos our domestic stock and Develop a 10-year asbestos survey programme within the domestic housing stock built prior to 2000, to provide 100% coverage by 2029.
- To hold relevant asbestos information within an Asbestos Register and make this information available to others who may have an interest.
- Undertake remedial works as appropriate to address risk identified from the asbestos surveys and as detailed within the Asbestos Safety Management Plan.

This document will be stored on Connect Housing Intranet for internal stakeholders and will be available to be viewed by external stakeholders via their website.

3. Compliance with Regulatory Standards and Legal Obligations

The application of this policy ensures compliance with the regulatory framework for social housing in England, which requires all housing providers to 'meet all applicable statutory requirements that provide for the health and safety of the occupants in their homes'.

Connect Housing acknowledges and accepts their responsibilities under the Control of Asbestos Regulations (CAR 2012) to identify and to safely manage asbestos containing

materials (ACMs) in its premises. Approved Codes of Practice and guidance information published by the Health and Safety Commission and Executive shall be taken as the adopted standard.

The duties as set out in Regulation 4 of The CAR 2012 Regulations rests with the 'Duty Holder' (person in control of the premises and maintenance activities) in the non-domestic premises and to those 'common areas' (non-domestic areas) of properties providing rented or leased accommodation.

Connect Housing will apply the principles of CAR 2012, to identify and safely manage ACMs, within its domestic housing stock.

It is not a requirement of regulations for Connect Housing to remove all asbestos when identified. However, by the use of risk management Connect Housing will manage asbestos containing materials (ACMs) via reasonably practicable means to prevent exposure to asbestos fibres to comply with the regulations.

Connect Housing takes the view that delivery of the commitments within this policy will ensure that the requirements of other legislation, such as the Health and Safety at Work etc. Act 1974 and Landlord Tenant Act 1985 will also be met.

It is essential to ensure customers, residents, employees and visitors remain safe in our premises (both individual homes and offices). Failure to properly discharge our legal responsibilities may result in:

- Prosecution by the Health and Safety Executive under Health and Safety at Work Act 1974
- Prosecution under Corporate Manslaughter and Corporate Homicide Act 2007
- HCA serious detriment judgement
- Reputational damage
- Loss of confidence by stakeholders in the organisation

4. Scope

This policy relates to offices, general needs housing, supported housing, sheltered housing, other rented properties owned and managed by Connect Housing. It also covers communal areas including leaseholders/ shared ownership; other rented housing managed by Connect Housing on behalf of a third party; and remote plant and garages; unless other parties are explicitly specified as having statutory responsibility in a lease or management agreement.

This policy is applicable to all premises built or refurbished before the year 2000 and all properties constructed before this date will be included within the asbestos surveying programme and assumed to contain ACM until a survey has been completed and the presence of asbestos has been confirmed or disproved.

Property Classification

All properties will be categorised as detailed below:

- Asbestos Free (post 2000)
- Surveyed and no asbestos identified
- Contains Asbestos (surveyed and confirmed to contain asbestos)
- Potentially contains asbestos (un-surveyed where there is a risk asbestos may be present)

All premises which have been identified to contain asbestos within communal (non-domestic) areas will be included in the annual asbestos re-inspection programme.

Record Keeping

The requirement whether to undertake an asbestos survey (Management or Management + R&D Surveys) and the categories will be held within Connect Housing Associations Asbestos Register (currently Excel Workbook).

All records relating to this service shall be kept indefinitely. Certificates associated with those visits will be held in the electronic asbestos register (QL) and PDF copies held within INVU these shall be made available to other interested parties – surveyors, contractors, etc.

We will carry out regular validation checks to identify whether properties not recorded as having an asbestos category in QL are required to be added.

An assessment will be completed on each property at the time it is first recorded on QL to determine if an asbestos survey is required. Subsequently, further Asbestos surveys may also be needed at other stages in property lifecycle depending on whether existing survey is suitable for proposed scope of works such changes may include;

- New Property Acquisitions (within properties constructed pre- 2000)
- Change of Tenancy or Tenure
- Refurbishment

Contractors Competency

Only UKAS accredited Consultants to ISO:17020 will be appointed to carry out surveys and persons appointed to measure the concentration of asbestos fibres will be ISO:17025 accredited

All non-licensed work involving ACM will be carried out with the appropriate controls in place

All ACM samples will be tested by a [UKAS](#) – accredited laboratory.

Maintenance work will only be awarded to/conducted by those contractors held on the Connect Housing list of Approved Contractors.

Contractors appointed to undertake remedial work or removal of asbestos containing materials shall be competent and listed on Connect Housing's list of Approved Contractors. They shall hold a Licence issued by the Health and Safety Executive and be members of an appropriate trade association such as the [Asbestos Removal Contractors Association \(ARCA\)](#)

All licensable work will be undertaken by licensed contractors and notified to the HSE using the [ASB5](#) form at least 14 days before the work starts.

Internal Competency

Connect Housing will ensure that all colleagues undertaking key roles within the delivery and management of this area will have access to training and support applicable to their roles.

Connect Housing will ensure all repair and maintenance operatives are competent in carrying out work on site and have been made aware of the type and location of asbestos before works are undertaken.

If internal works operatives are involved in low risk (Non-Licensed) asbestos related work as part of their daily operations, they will receive UKATA Cat B Non- Licensed Work training as mandatory.

Connect Housing's wider organisational commitment to health and safety is set out in the Health and Safety Policy.

5. Monitoring

Connect Housing Board is the Landlord and as such is the legal entity responsible for meeting the required standards. It requires regular assurance on the performance of this Policy. Board will oversee the discharge of the required standards and will receive regular reports on the performance of this policy and is accountable for ensuring its implementation. It will also ensure that appropriate governance arrangements are in place. The Board, through the Audit and Risk Management Committee, will receive regular summary reports on performance as detailed in this policy and be responsible for ensuring any necessary remedial action is undertaken to comply with the policy.

Audit and Risk Committee – will receive quarterly KPI reports and commentary on landlord compliance performance. They will draw any concerns they may have arising from such reports to the attention of the Board.

Connect Housing Chief Executive Officer will retain the overall responsibility for the monitoring of the consistent implementation of this policy.

The Director of Home shall have overall responsibility for Asbestos Safety and for implementing this policy. They shall appoint /nominate Principle Duty Holders for relevant areas of asbestos safety as described within this Policy.

Director of Finance and Resource and the Senior Manager Business Assurance shall provide an effective performance management framework that will strengthen risk control and provide greater levels of assurance. Implementation of this policy and monitoring of audit feedback shall be the role of the Business Assurance Team who will also oversee the timetable for review of each Landlord Compliance service area.

Data Governance – asbestos safety responsibilities will be held within a master database (QL). The completeness of the master database will be regularly validated and reconciled. The reconciliation will identify the addition or removal of any properties which require inclusion in the programme i.e. acquisitions and transfers. The number of Officers who can add or remove properties within the master database will be limited and closely managed. Other databases or spreadsheets used to manage the implementation of this Policy will also be reconciled with the master database on a regular basis.

Key Performance Indicators

Performance reports will be taken direct from the Connect's databases to ensure compliance can be monitored against minimum agreed Performance Indicators. The Audit and Risk Management Committee and Board will regularly receive high level KPIs as follows:

- % Communal Areas (pre- 2000) where (as a minimum) an Asbestos Management Survey has been undertaken.
- % of Domestic Properties (pre- 2000) where (as a minimum) an Asbestos Management Survey has been undertaken
- % of Communal Area re-inspection programme completed

Commentary will be provided for any properties out of date to include the date they became overdue, days overdue, and their position within the access legal process to bring them back into a compliant position. Commentary will also be provided if any properties have outstanding overdue actions. To provide additional context commentary will also include information on the proportion of activities within the reporting period that were undertaken before and after their due date.

Audit and 3rd Party Quality Assurance - this service area will be included within the cyclical Internal Audit Programme which will review (in particular) adherence to process, data and record keeping.

In addition, Connect Housing will seek additional independent (3rd Party) quality assurance to ensure they can robustly demonstrate asbestos safety compliance by

procuring independent specialist to regularly inspect, monitor and report on the technical performance and quality of this business-critical service area.

Asbestos safety is a priority for Connect in order to ensure we provide our customers with safe homes. This policy will be reviewed on a biennial basis, or following legislative changes. If, as a result, of either the finding of the Internal Audit Programme or the 3rd Party Independent Quality Assurances, the service is not performing to the desired level then this will trigger an earlier external strategic review.

6. Policy Statement

The Chief Executive, Directors and the Board of Connect acknowledge their moral and legal duty to ensure that all employees, tenants, and any other visitors to premises under Connect Housing's control, are adequately protected from all foreseeable asbestos safety risks that may arise.

In order to achieve this, Connect Housing will ensure that adequate resources are made available, suitable and sufficient asbestos surveys are conducted, and appropriate remedial measures are implemented in all premises under Connect Housing's control.

Connect Housing aims to provide a safe environment in which our tenants (and other relevant persons) are assured that the risk of asbestos related illness or injury is minimised. Across our stock we have a variety of tenants and our approach will take into consideration additional needs for vulnerable, older, and mobility impaired residents.

In order to comply with regulatory standards and legal obligations, and to ensure the safety of its customers, staff, contractors and visitors to its properties, Connect Housing will:

Process

- Provide clear lines of responsibility for the management of asbestos safety
- Ensure that a clear and consistent process including front-line engagement and enforcement is in place to obtain access to properties to undertake asbestos safety checks, which shall include legal action when required.
- Proactively assess available data for relevant information about the customer to help gain access (disability, vulnerability, local connections, etc.).

Delivery

The Asbestos Safety Policy will ensure all residents and visitors remain safe in their home or place of work which will be achieved through effectively identifying the properties covered by the CAR 2012 regulations and undertaking the following;

- Take reasonable steps to assess if there are materials containing asbestos in non-domestic premises, and if so, the type/amount, where it is and the condition of the asbestos.
- Presume materials contain asbestos unless there is strong evidence that they do not
- Maintain up-to-date electronic records within Connect Housing Association Asbestos register of the type, location and condition of the ACM's - or materials which are presumed to contain asbestos
- Ensure that where suspect materials are discovered, a relevant competent person undertakes an assessment of the risk to residents, employees and third parties
- Assess the risk of anyone who could be exposed to fibres from the ACM materials
- Prepare a plan that sets out in detail how the risks from these materials will be managed
- Take the necessary steps to put the plan into action
- Periodically review and monitor the plan and the arrangements to act on it so that the plan remains relevant and up-to-date

Provide site-specific advice and information on the location and condition of the materials to anyone who is liable to work on or disturb them and raise awareness of the asbestos safety policy and management plan

Develop a 10-year asbestos survey programme within the domestic housing stock built prior to 2000, to provide 100% coverage by 2029.

In the development of the asbestos survey programme we will take into account asbestos surveys completed in association with property disposals and refurbishments, responsive and void repairs and planned maintenance programmes and their contribution toward achieving the forward plan delivery target of 2029.

We will not undertake a partial Refurbishment Survey, without also completing a whole property Management Survey (if one doesn't already exist). The completeness of the Management Survey will be reviewed upon receipt, and where issues of no access to parts of the property render the survey unacceptable as an asbestos management tool, they will be returned to the asbestos surveying contractor for further investigation. We will only count whole house asbestos surveys when we calculate the % of the stock for which we have an asbestos survey coverage.

We will ensure customers and leaseholders are informed about forthcoming work, any asbestos related risks that there may be, and our management and control of those risks. Where it is not possible to carry out works and manage the risk to customers and the workforce with residents in situ, we will arrange temporary accommodation for residents in conjunction with our Decant Policy.

Customers will be provided with asbestos information in respect to their homes at the commencement of their tenancy. Asbestos information will be provided in other circumstances when requested.

We will set out our emergency approach in the case of an unplanned incident, such as accidental damage of an ACM, within the Asbestos Safety Management Plan.

Within Non-Domestic Properties Connect Housing will implement further measures to support the assurance of Asbestos safety:

- Prepare property specific Asbestos Safety Management Plans to manage the risk and put it into effect to ensure that:
- Any material known or presumed to contain asbestos will be kept in a good state of repair, and re-inspected
- We will assess the risk of the likelihood of anyone being exposed to asbestos materials
- Any material that contains or is presumed to contain asbestos will be provided with a risk score which will determine the most appropriate course of action to minimise the release of fibres which will include manage in situ, encapsulate or remove.
- Information on the location and condition of the material will be provided to anyone potentially at risk.

7. Inclusive Services

Connect Housing puts people at the heart of everything we do, to ensure customers are happy with the service we provide. To do this, we always strive to provide an inclusive service.

To achieve our aims, we have put in place, a wide range of support tools and adaptations to services that can support our diverse customer base, including our vulnerable customers. In addition, we are constantly seeking to improve our service to customers and will continue to introduce new and innovative ways to achieve this.

While we treat all tenants and their homes with courtesy and respect, listening and responding to individual needs, we also recognise that our customers' safety, and that of

visitors to their property is paramount. We must ensure that we gain entry to undertake appropriate safety checks, servicing and repairs. We will always try to work with the tenant to resolve any issues and gain entry and any relevant information is passed to our employee or our contractor to enable an appropriate response. These responses could include the need for an accompanied visit, following a Potentially Violent Person (PVP) alert on QL, or making sure the operative allows sufficient time for a tenant with mobility impairments to answer the door.

We operate in a community with wide social diversity and are committed to providing equal opportunities and value diversity. We will treat all tenants fairly, with respect and professionalism, regardless of gender, race, age, disability, religion, sexual orientation and marital status. We recognise the importance of working in partnership with our tenants to develop and continually improve our services and raise standards and will work in line with our Neighbourly Places team.

All activities will be subject to compliance with the General Data Protection Regulations (2018).

8. Value for Money

It is our aim to continually assess opportunities to enhance our services to customers and actively involve our employees and customers to achieve value for money.

We continually look for the best value for money by sourcing the best materials at the best price. And we're always looking for ways to make our services work more efficiently and effectively.

There is a culture of "do the right things" and "do things right", helping ensure our service delivery is efficient, effective, and economical.

Appendix:

A: Glossary of terms

The following provides a list of words relating to a specific term or abbreviation used in the Policy and Management Plan as detailed below:

For the purpose of this policy the following terms will mean:

- **“Landlord”** will mean Connect Housing.
- **The Regulator of Social Housing, (ROSH)** - responsible for the regulation of social housing providers in England
- **Health and Safety Executive (HSE)** – Non-departmental public body in the United Kingdom responsible for the encouragement, regulation and enforcement of workplace health, safety and welfare, and for research into occupational risks in England and Wales and Scotland.
- **QL** - Housing Management System, Connect Housing’s electronic housing management system.
- **Duty Holder** - The person responsible for ensuring the requirements of the CAR 2012 Regulation 4 are carried out. Under Regulation 4, landlords have certain duties towards their customers to minimise the risk of exposure to asbestos.
- **“Responsible Person”** is the person nominated by the owner or Duty Holder of the premises, with authority, skills, knowledge and training to take appropriate action.
- **ACM** – A material that contains asbestos
- **UKATA** – UK Asbestos Training Association - set standards and audit and manage the list of asbestos training providers.
- **“So Far as Is Reasonably Practicable”** – involves weighing a risk against the time, complexity, physical difficulty and money needed to control it..
- **Asbestos - Management Survey**- is a survey to identify if asbestos is present in a property which includes sampling but may be restricted to sampling only those materials where the presumption of asbestos could create difficulties or unnecessary expense for the building’s duty holder.

- **ACOP** – Approved Code of Practice which are regarded as best practice and supplement regulation giving practical guidance on compliance.
- **UKAS** - the United Kingdom Accreditation Service who are the 'sole national accreditation body recognised by Government to assess, against internationally agreed standards, organisations that provide certification, testing, inspection and calibration services'.
- **CAR** - is the Control of Asbestos Regulations (2012) which came into force on 6 April 2012, updating previous asbestos regulations to take account of the European Commission's view that the UK had not fully implemented the EU Directive on exposure to asbestos (Directive 2009/148/EC).
- **MRA** – is the Material Risk Assessment (as defined within HSG264)
- **PRA** - is the Priority Risk Assessment (as defined within HSG227)

B: Current legislation applicable to this policy

- [The Health and Safety at Work Act 1974](#)
- [Control of Asbestos Regulations \(CAR\) 2012](#)
- [The Management of Health & Safety at Work Regulations 1999](#)
- [Workplace \(Health, Safety and Welfare\) Regulations 1992](#)
- [Hazardous Waste Regulations 2005](#)
- [Construction \(Design and Management\) Regulations 2015.](#)
- [REACH \(Registration, Evaluation, Authorisation and Restriction of Chemicals Regulations 2006\)](#)
- [Approved Codes of Practice \(ACoP\) \(Health & Safety Commission\)](#)
- [ACoP L143 - 'Managing and Working with Asbestos' \(December 2013\)](#)
- [HSG 264 \(Asbestos\)](#)
- [Guidance Documents \(Health & Safety Executive\)](#)
- [HSG247- 'Asbestos: The licensed contractors' guide'](#)
- [HSG248 - 'Asbestos: The analysts' guide'](#)
- [HSG189/2 - 'Working with asbestos cement'](#)
- [HSG213- 'Introduction to asbestos essentials \(First Edition\)'](#)
- [HSG210- 'Asbestos essentials task manual \(Second Edition\)'](#)
- [HSG33- 'Health and safety in roof work \(First Edition\)'. \(Covers asbestos cement roof demolition\)](#)
- [HSG227- 'Comprehensive guide to managing asbestos in buildings'](#)
- [EH51- 'Respiratory equipment for use in removing asbestos'](#)
- [Homes and Communities Agency Regulatory Standard \(The Home Standard\)](#)

C: Version History

Version	Date	Summary of Changes
2	February 2022	Minor changes to clarify frequency of review as biennial and amend logo
1	January 2019	Introduced as part of compliance review