



# Asbestos Management Plan

If you have difficulty with sight or hearing, or if you require this document translated, please contact us and we will be happy to provide this information in a format that suits your needs.

# Our Vision, Our Mission, Our Values

## Our Vision

Elderpark Housing will lead the way in delivering outstanding customer services and great places to live.

## Our Mission

To provide quality, affordable homes and excellent services which place a focus on our customers and enhancing our communities.

## Our Values



## Equality and Diversity Statement

Elderpark Housing are committed to ensuring people or communities do not face discrimination or social exclusion due to any of the following protected characteristics: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion and belief; sex or sexual orientation.

This document complies with the Associations Equality and Diversity Policy.

The Association will regularly review this Policy for equal opportunities implications and take the necessary action to address any inequalities that result from the implementation of this Policy.

<b>Contents</b>	<b>Page</b>
<b>1 Introduction</b>	<b>4</b>
<b>2 The Duty Holder</b>	<b>4</b>
<b>3 Personnel and Responsibilities</b>	<b>4-7</b>
<b>4 Identification of Asbestos</b>	<b>7</b>
<b>5 Management surveys</b>	<b>7</b>
<b>6 Refurbishment and demolition survey</b>	<b>7-8</b>
<b>7 Management Strategy</b>	<b>8</b>
<b>8 Assessment of Risk</b>	<b>9-10</b>
<b>9 Communicating with our Tenants</b>	<b>11</b>
<b>10 On-going Monitoring</b>	<b>11-12</b>
<b>11 Identification of damaged or disturbed suspect material</b>	<b>12</b>
<b>12 Review of the Management Plan</b>	<b>12</b>
<u>Appendix 1</u>	Information and advice for tenants
<u>Appendix 2</u>	Reactive Repairs Flowchart for Asbestos Management
<u>Appendix 3</u>	Void works Flowchart for Asbestos Management
<u>Appendix 4</u>	Asbestos flowchart for Planned works
<u>Appendix 5</u>	Asbestos procedures at Demolition
<u>Appendix 6</u>	Asbestos procedures at Refurbishment works
<u>Appendix 7</u>	HSE Asbestos Emergency Procedures Flowchart

## **1 Introduction**

- 1.1 The purpose of the Asbestos Management Plan (AMP) is to assist with the control and management of ACMs in The Associations non-domestic properties and communal areas. All non-domestic properties constructed prior to 2000 will be subject to the AMP.
- 1.2 The duty to manage applies to all non-domestic premises and communal areas including shops we let and the community centre we manage, as well as other communal areas like closes, roof spaces, entrances, foyers, etc.

## **2 The Duty Holder**

- 2.1 The duty to manage asbestos is contained in regulation 4 of the Control of Asbestos Regulations (CAR) 2012. It requires the person who has the duty (i.e. the 'duty holder') to:
  - take reasonable steps to find out if there are materials containing asbestos in non-domestic premises, and if so, its amount, where it is and what condition it is in
  - presume materials contain asbestos unless there is strong evidence that they do not
  - make, and keep up-to-date, a record of the location and condition of the asbestos-containing materials - or materials which are presumed to contain asbestos
  - assess the risk of anyone being exposed to fibres from the materials identified
  - 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 information on the location and condition of the materials to anyone who is liable to work on or disturb them

There is also a requirement on others to co-operate as far as is necessary to allow the duty holder to comply with the above requirements.

## **3 Personnel and Responsibilities**

- 3.1 Elderpark HA's Health and Safety Policy, the Asbestos Policy and the persons named in the Health and Safety policy statement have overall responsibility for ensuring the health and safety of employees and others using the Association's properties including the protection of those persons from asbestos.
- 3.2 The Duty Holders tasks (not the responsibility) are delegated to the Asbestos Co-ordinator who should be given appropriate training, authority and resources to enable him to fulfil this role and report to the Management Committee and Chief Executive.

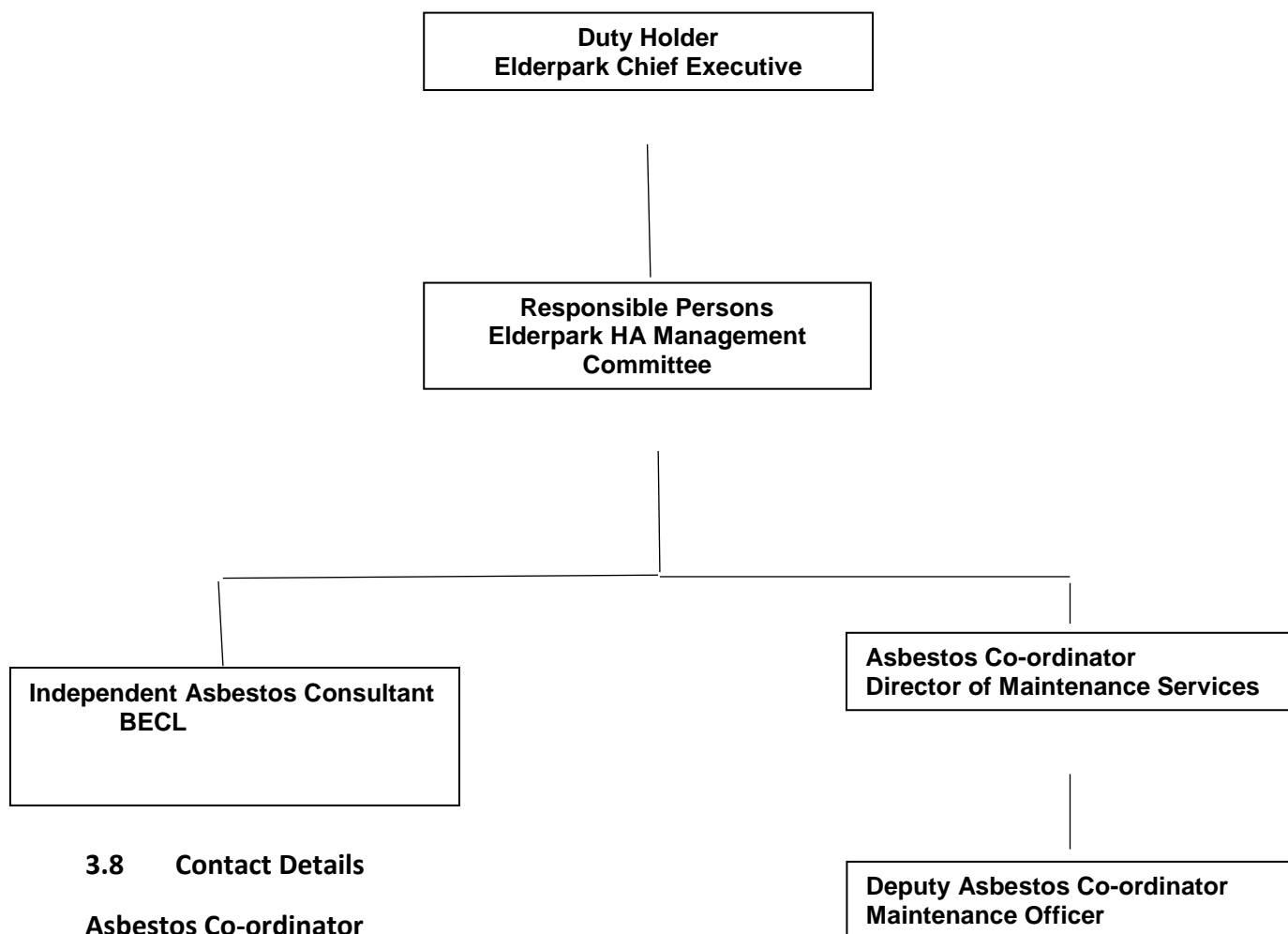
The Asbestos Co-ordinator will be responsible for the development and implementation of the following:

- The Asbestos Policy Statement
- Organisation and arrangements to put the Asbestos Management Plan into effect
- Maintenance and amendment of the Asbestos Register
- Annual and periodic review of the operation of the Asbestos Management Plan
- Vetting or appointment of licensed and non-licensed asbestos contractors to undertake work on asbestos containing materials
- Ensuring supervision of asbestos removal works
- Maintenance of records associated with work with asbestos
- Training and staff liaison regarding asbestos containing materials

- 3.3 The Deputy Asbestos Co-ordinator reports to the Asbestos Co-ordinator and adopts the role of the Asbestos Co-ordinator in his absence.
- 3.4 Independent Asbestos Consultants (ACS Environmental) who are available to provide technical and legal advice to the Asbestos Co-ordinator and his Deputy as and when required.
- 3.5 The independent Consultant also supervises/monitors asbestos works as and when required to do so, including completing surveys, sampling, analysis and the issue of relevant certificates/documentation.
- 3.6 The independent Consultant also advises upon the competence of licensed and non-licensed Contractors during the selection of Contractors.

Please refer to Organisational Hierarchy chart below

### 3.7 Organisational Hierarchy chart



### 3.8 Contact Details

#### **Asbestos Co-ordinator**

Name: David Adam

Designation: Director of Maintenance Services

Office address: Elderpark Housing Association,  
65 Golspie Street G51 3EW

Telephone: 0141-440-2106

Email: [david.adam@elderpark.org](mailto:david.adam@elderpark.org)

#### **Deputy Asbestos Co-ordinator**

Name: Derek Robertson

Designation: Maintenance Officer

Office address: Elderpark Housing Association,  
65 Golspie Street G51 3EW Telephone: 0141-440-2244

Email: [derek.robertson@elderpark.org](mailto:derek.robertson@elderpark.org)

## **Independent Asbestos Consultant**

Bradley Environmental Consultants Limited

Unit 16

Geddes House

Kirkton Road North

Livingston

West Lothian

EH54 6GU

Tel 01506 533 373

Email [info@bradley-enviro.co.uk](mailto:info@bradley-enviro.co.uk).

## **4 Identification of Asbestos**

- 4.1 The Association will increase the intelligence of our stock with regards to asbestos by carrying out surveys to establish the presence, location and type of asbestos contained within a property owned by the Association.

Surveys will be carried out as follows:

- Management surveys on all non-domestic properties and communal areas (built before 2000)
- Where major works are being carried out and ACMs are suspected
- Management or Refurb/Demo survey\* on properties due for works
- A 10% sample of stock not subject to any of the above.
- We shall strive to limit the use of cloned data based on non-domestic properties and communal areas..
- Refurbishment works carried out and previous survey information.

- 4.2 The survey type is determined by the scale of the work:

## **5 Management surveys**

- 5.1 An asbestos management survey is a non-intrusive survey, which should be completed by a competent person and meet the criteria specified in Asbestos: The Survey Guide (HSG264).

The surveyor completing this work is expected to be capable of determining the number of samples necessary in any given room based on the material, location and their experience.

- 5.2 Management Surveys sample all readily accessible suspect materials and are generally commissioned in order to develop general information on the incidence of ACM's across housing stock and office/commercial premises.

## **6 Refurbishment and demolition survey**

- 6.1 If down-taking or intrusive maintenance work is planned, then a Refurbishment and Demolition Survey should be completed instead of a Management Survey. Refurbishment and demolition surveys are undertaken where significant disruptive works will be carried out in properties.

- 6.2 While this typically relates to demolition and major refurbishment works the HSE have issued guidance stating that this type of survey should be undertaken in advance of planned improvement project e.g. kitchen and bathroom replacement projects. (Refurbishment & Demolition surveys sample all suspect materials, and are intrusive leading to damage to wall panels, floors, service risers etc.).
- 6.3 Where improvement programmes are to be undertaken in the housing stock for example: kitchen and/or bathroom replacement programmes, a representative sample number of Refurbishment & Demolition surveys will be carried out on each Property type included in the project.
- 6.4 Surveys will be undertaken by a UKAS Accredited surveyor/organisation. Surveys will identify and record the location, extent, condition and type of any known or presumed ACM. Surveys can be instructed by any member of the Maintenance Services team but all completed surveys must be copied to the Asbestos Co-ordinator and Deputy Asbestos Co-ordinator.

## **7 Management Strategy**

- 7.1 Surveys of premises for the purposes of identification and assessment of ACM will be carried out in full accordance with the guidance set out in the HSE publication, HSG264 -Surveying, Sampling and Assessment of Asbestos-Containing Materials.
- 7.2 Elderpark HA will ensure that appropriate sample Refurbishment / Demolition Surveys will be carried out prior to any demolition work or major refurbishment within properties with ACM.
- 7.3 Elderpark HA will ensure that all external consultants and contractors working on such surveys utilise laboratory testing using appropriate experience and accreditation to either ISO 17025 or EN 45013. All Management asbestos surveyors used by Elderpark HA will be trained to BOHS P402 standard.
- 7.4 Elderpark HA will carry out sample surveys of all materials within their domestic and non- domestic buildings. These surveys enable Elderpark HA to be aware of the exact location, extent and condition of all ACM in the properties that they have surveyed.
- 7.5 These sample surveys will be Management, and where appropriate, Refurbishment/Demolition in line with all current regulations.
- 7.6 The findings of all surveys will be used for management purposes, to be defined in subsequent sections of this document.
- 7.7 Existing survey reports include photographic evidence, laboratory analysis certificates and marked-up building plans (where available). These can be viewed on Elderpark HA's asbestos management system.
- 7.8 Regulation 4(6) of the CAR requires review of the assessments resulting from such surveys if there is any reason to suspect that assessment is no longer valid or if there have been significant changes to the property.
- 7.9 To comply Elderpark HA will undertake periodic re-inspections in accordance with the Risk Assessment Scores (RAS), with any changes recorded in the records. Additionally, there will be annual reviews by the Assurance and Governance Team for the purposes of ensuring the management plan and survey records remain up to date and valid. The duty holder will ensure the conclusions of any reviews are recorded as described previously.



## 8 Assessment of Risk

- 8.1 Regulation 4(8), part (a) carries the requirement to undertake an assessment of the risk of exposure of persons to asbestos fibres. The assessment of risk will utilise the results of the Material Assessment Score (MAS) for the identified ACM. This will be provided by the surveyor.
- 8.2 Elderpark HA will determine the priority for management of ACMs by assessing the likelihood of those materials being disturbed. This priority assessment will take into account such factors as;
- The location of the material
  - Its extent
  - The use to which the location is put
  - The occupancy of the area
  - The activities carried out in the area; and
  - The likelihood/frequency with which maintenance activities are likely to take place
- This will enable the production of a Priority Assessment Score (PAS) for management.
- 8.3 The full assessment of risk of exposure, will include both the MAS and PAS for each ACM identified. This is known as the Risk Assessment Score (RAS), and is the score from the addition of the MAS and the PAS.
- $$\text{RAS} = \text{MAS} + \text{PAS}$$
- 8.4 Surveys and assessments on any subsequent acquisitions, Elderpark HA will undertake to have completed both the PAS and the full risk assessment on each ACM on receipt of the sampling survey results.
- 8.5 Both the PAS and the results of the risk assessment will be recorded and made fully available as necessary in Elderpark HA's Asbestos Management database.
- 8.6 The Asbestos Co-ordinator (and in their absence Deputy Asbestos Co-ordinator) will ensure that the risk assessment process is undertaken within 10 working days of receipt of the survey report. This will also include the updating of Elderpark HA's asbestos Management database.
- 8.7 The Association will appoint a suitably qualified contractor to carry out asbestos surveys and assess the risk in relation to ACMs by carrying out a material risk assessment and detailing:
- Property code
  - Property address
  - Material type
  - Location
  - Damage
  - Surface treatment
  - Asbestos type
  - Recommendations to remove/monitor/label/manage
- 8.8 It is not the policy of the Association to remove ACMs that are in good condition and present insignificant risk to the health of the building occupants, however we recognise the need for flexibility where there is a case made for specific removal.

If the Association decides to leave the asbestos in situ then it will:

- Log the details on the register and refer user to survey which will include a floorplan of the property with ACM areas highlighted.
- Ensure that all tenders for planned and cyclical works include reference to the Control of Asbestos Regulations 2012 and the Associations asbestos register.

Work orders for reactive repairs will highlight areas of ACM. Damaged ACMs will be made safe either by encapsulating or by removing the ACM entirely. The Asbestos Management Database will be updated to reflect the action taken.

#### 8.9 Communicating with our Contractors

Prior to any work being instructed and carried out in properties owned or managed by The Association, the Asbestos register must be consulted and information in relation to ACMs communicated to contractors.

#### 8.10 Contractors Responsibilities

Contractors (including sub-contractors) working for the Association are responsible for ensuring that all employees under their control reference the Asbestos Register and understand its content and actions required. They are also responsible for ensuring all employees under their control work in line with the Associations Asbestos policy and management plan and have received Asbestos Awareness training. The Association has the same responsibility for its staff.

#### 8.11 Prior to starting a job if a contractor suspects the presence of asbestos, they must not start it and contact the Association for advice. If the property has not been previously surveyed and was constructed prior to 2000 the job must be postponed until a survey is carried out.

When, during the course of any work, asbestos or material suspected of being asbestos, not identified by the asbestos register is discovered, the contractor will ensure that:

- All work is stopped in the area;
- All persons are removed and kept out of the immediate vicinity without causing undue concern
- The area is closed, sealed or locked off (where practicable.
- Any equipment or materials are left in place. These will require to be disposed of as special waste depending on the result of sampling.
- A warning sign(s) with the following, or similar, wording:  
POTENTIAL ASBESTOS HAZARD - KEEP OUT' is prepared and prominently displayed. Where this is not deemed appropriate to use this type of wording alternative strict entry prohibition notices will be used.
- The Maintenance Officer/Director of Maintenance is immediately notified.
- Arrangements are made for the suspected ACM to be sampled by a competent Asbestos Surveyor and analysed by a UKAS Accredited Laboratory.
- The above may vary depending on the particular circumstances involved.

**Contractors should refer any queries to The Association at the earliest opportunity.**

## 9 Communicating with our Tenants

- 9.1 Where asbestos materials are identified, are in good condition and remain in-situ, tenants will be provided with an information leaflet (Appendix 1 Asbestos Information and Advice for tenants)

The information leaflet will be included in sign up packs for new tenants or sent to existing tenants where asbestos has been found. The information leaflet will include the following:

## 10 On-going Monitoring

- 10.1 All asbestos records and procedures must be regularly monitored and reviewed. It is imperative that all asbestos documents are kept up to date and are accessible to staff and contractors. The Asbestos Management Database provides details on areas and properties surveyed and their findings recorded located on the Association's company Y drive:

[Asbestos Management register 2021 – to be inserted when completed](#)

- 10.2 The register is set up to be read only for most staff. Editing permissions are set for the Director of Maintenance Services (Asbestos Co-ordinator). Maintenance Officer (Deputy Asbestos Co-ordinator)
- 10.3 Any changes to the condition and location of any known or suspected ACM's must be recorded on the asbestos register and associated files.  
Similarly, any removal work or encapsulations must be recorded with encapsulations subject to annual inspections..
- 10.4 Amendments to the Asbestos Register, Asbestos Management Plan and Asbestos Management database
- 10.5 It is vital that the Asbestos Register, Asbestos Management Plan and Asbestos Management database are amended to reflect the existing situation and conditions. It is the responsibility of the Asbestos Coordinator to ensure that such amendments are completed and accurate.
- 10.6 The Asbestos Register and Asbestos Management Plan are only to be amended by or with the authority of the Asbestos Co-ordinator.
- 10.7 A review of the Management Plan is to be undertaken by the Asbestos Co-ordinator and external Asbestos Consultant every 12 months unless:
- There are changes in site conditions (e.g. changes in personnel or use of building)
  - There are changes in the condition of asbestos containing materials
  - In such cases, the Plan will be amended and re-issued immediately
  - Important areas for assessment review are:
    - Confirmation that removal, repair and encapsulation works have been completed satisfactorily
    - Checking that periodic monitoring of the condition of remaining asbestos containing materials is effective
    - Confirmation that records are being maintained and kept up to date
    - Investigation of incidents/accidents, development of future preventative measures
    - Checking that the plan is communicated to all concerned and included in tenders and contracts from external companies

- Confirmation that emergency procedures are in place and that the emergency services are aware of the presence of asbestos on the premises

## **11 Identification of damaged or disturbed suspect material**

- 11.1 The various processes for identifying asbestos via management and refurbishment asbestos surveys and what to do in the event that asbestos or suspected asbestos has been disturbed can be found in Appendices 2 - 7 of this AMP.
- 11.2 It is the responsibility of staff and contractors to report to The Association if they suspect that disturbed or damaged ACM's may be present in a building owned or partly owned by the Association. Where this is suspected the following applies:
- Immediate contact with a licensed asbestos survey contractor to identify if the material contains ACM's
  - Where damage to any material known to contain asbestos has taken place and is likely to give rise to airborne fibre release, the area must be isolated pending air monitoring tests being carried out.
  - Air monitoring tests will determine the level of any potential
  - Contamination, or provide reassurance that unacceptable contamination has not occurred.
  - Details of air test results will be made available for recording purposes
  - Remedial action will only be required when airborne fibre levels exceed levels as stated in the 2010 Health & Safety Guidance (HSG) 264 guidance
  - When remedial action becomes necessary after exposure, the relevant facts may have to be reported to the HSE in accordance with RIDDOR. Advice may be sought from a licensed asbestos survey contractor to determine whether the incident is in fact RIDDOR reportable.

## **12 Review of the Management Plan**

- 12.1 The Management Plan will be reviewed annually or earlier to take into account:
- Legislative, regulatory and good practice requirements
  - Association performance
  - The views of the Board, tenants, other customers, contractors and staff.
  - The corporate Risk Register
  - Association Aims and Objectives.



# ASBESTOS

**INFORMATION  
AND ADVICE  
FOR TENANTS**

## **WHAT IS ASBESTOS?**

Asbestos is a natural mineral that was used extensively for fireproofing and insulation, and for reinforcing a wide range of building products.

In the 1930's, it was realised that breathing in asbestos fibres could lead to damage to the lungs and other organs. In many cases, this could lead to fatal illnesses.

A series of Government regulations over the years has resulted in a complete ban on the use of asbestos in buildings, and new buildings are completely asbestos-free.

## **IS ALL ASBESTOS THE SAME?**

There are three common types of asbestos: blue, brown and white.

While all asbestos is potentially dangerous, blue and brown asbestos are known to carry a much higher risk than white asbestos.

For this reason, the blue and brown types were banned many years ago, followed by a complete ban by 1999.

However, asbestos is only dangerous if fibres are released into the air and are breathed in.

**ASBESTOS WHICH IS SEALED AND NOT DISTURBED IS NOT A HEALTH RISK**

## **WHERE WAS ASBESTOS USED?**

Asbestos has been used in a variety of ways in houses and flats, although the use of blue and brown asbestos was generally more common in factories, warehouses and public buildings.

The following examples give some idea of the extent to which asbestos was added to building materials:

Linings inside airing cupboards;  
Vinyl floor tiles;  
Roofing felt;  
Inside central heating boilers;  
Inside electric storage radiators;  
Artex ceilings and wall treatments;  
Asbestos-cement roof sheets;  
Asbestos-cement gutters & pipes.

Where asbestos is present, it is most likely to be bound into the material, meaning that the release of fibres is highly unlikely. (Vinyl floor tiles are an example.)

Remember, there is no health risk provided asbestos is not disturbed in such a way that fibres are released into the air.

### **WHAT SHOULD I DO?**

If you live in an older property (built before 2000), there is a simple rule you can follow: Don't drill, saw, sand, scrape or disturb any material, which could possibly contain asbestos. Check the list above.

If you suspect that there may be asbestos in or around your home, let us know. We can have a sample checked for you and we can advise you what to do next.

### **WHAT IS ELDERPARK DOING ABOUT ASBESTOS?**

We will soon be carrying out a programme of inspections in communal areas (that is, staircases and hallways in tenements and other common areas, commercial properties, etc.) to find out if there is any asbestos in the fabric of the building. This will be done on a rolling programme over the next few years.

These inspections will be carried by surveyors who have been trained to recognise asbestos materials. They will take samples for analysis so that the presence, or otherwise, of asbestos can be confirmed.

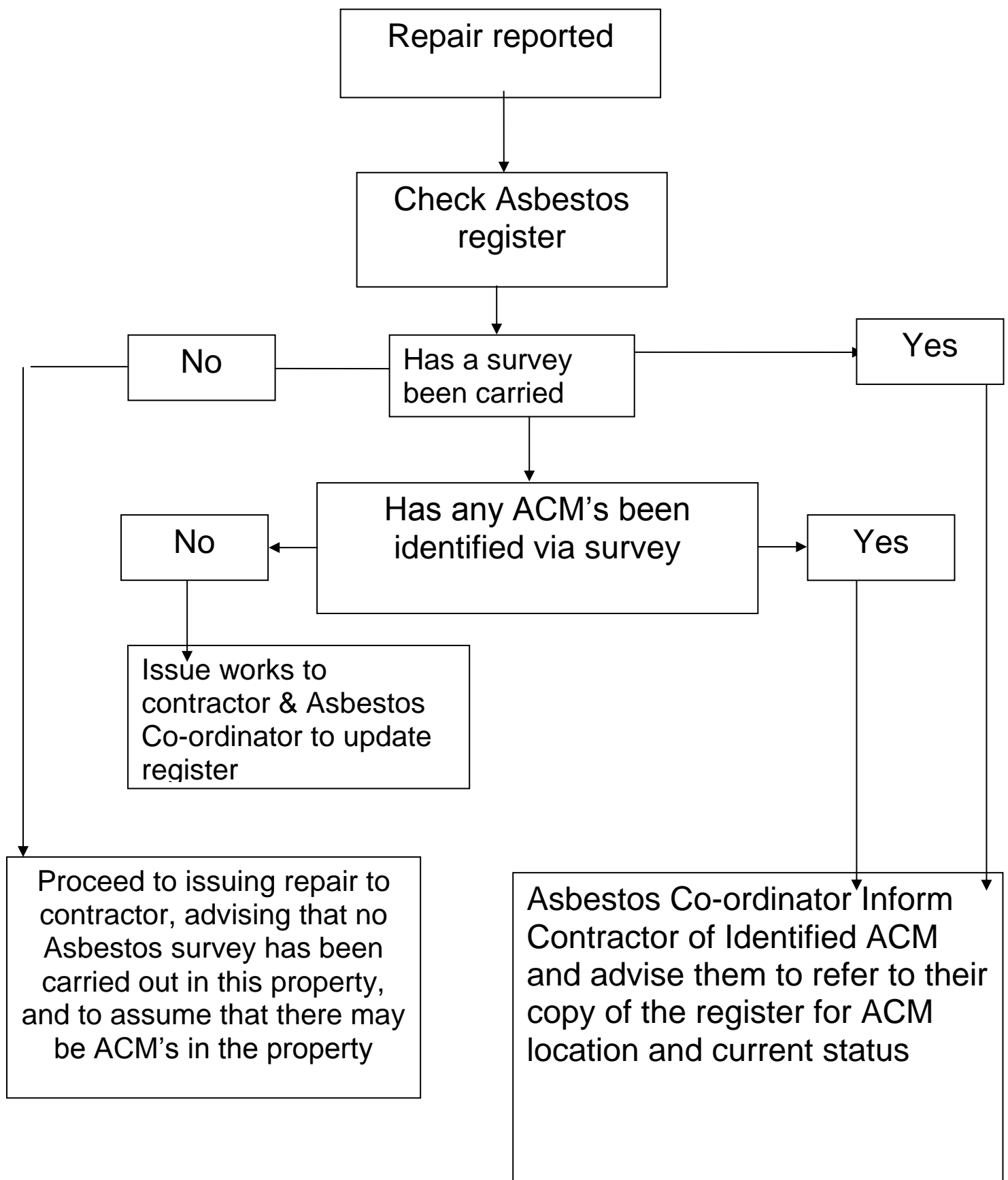
If we do find any asbestos materials, we will make sure they are maintained in a safe condition; contractors will be told not to disturb them unless proper precautions are taken.

When we have completed the inspections of communal areas, we will start a programme of checking our houses and flats.

## Appendix 2

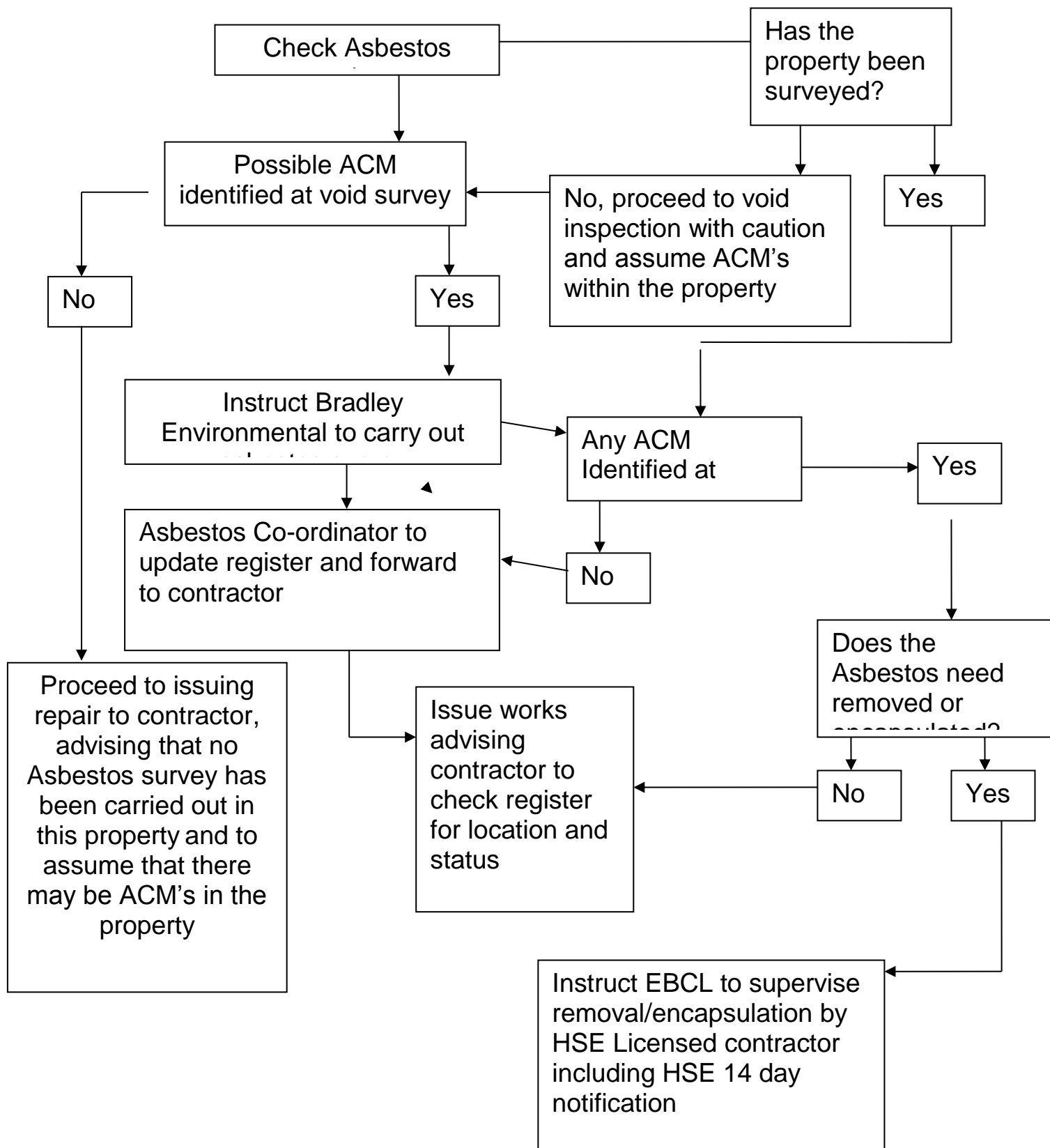
### Reactive Repairs Flowchart for Asbestos Management





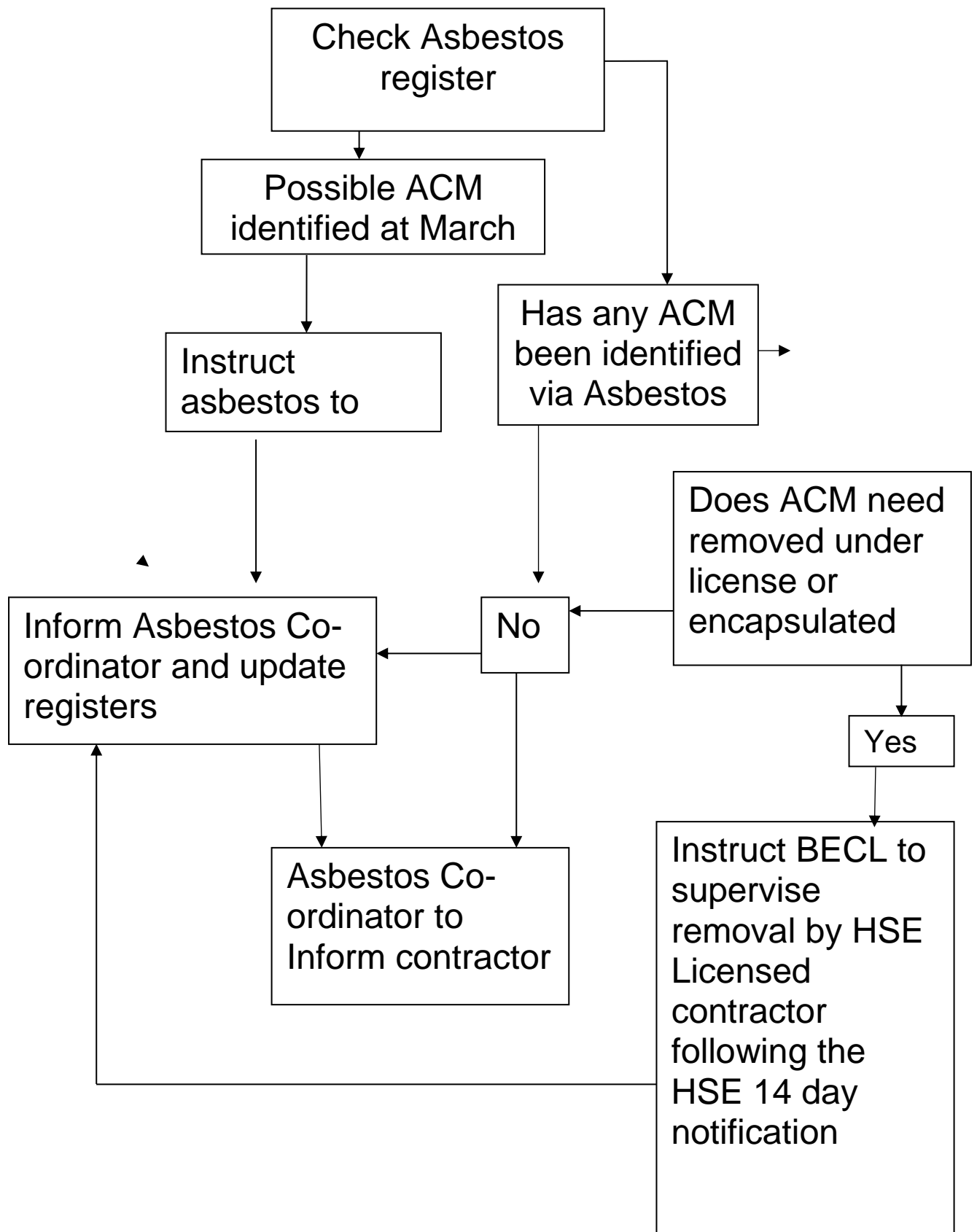
## Appendix 3

# Void works Flowchart for Asbestos Management



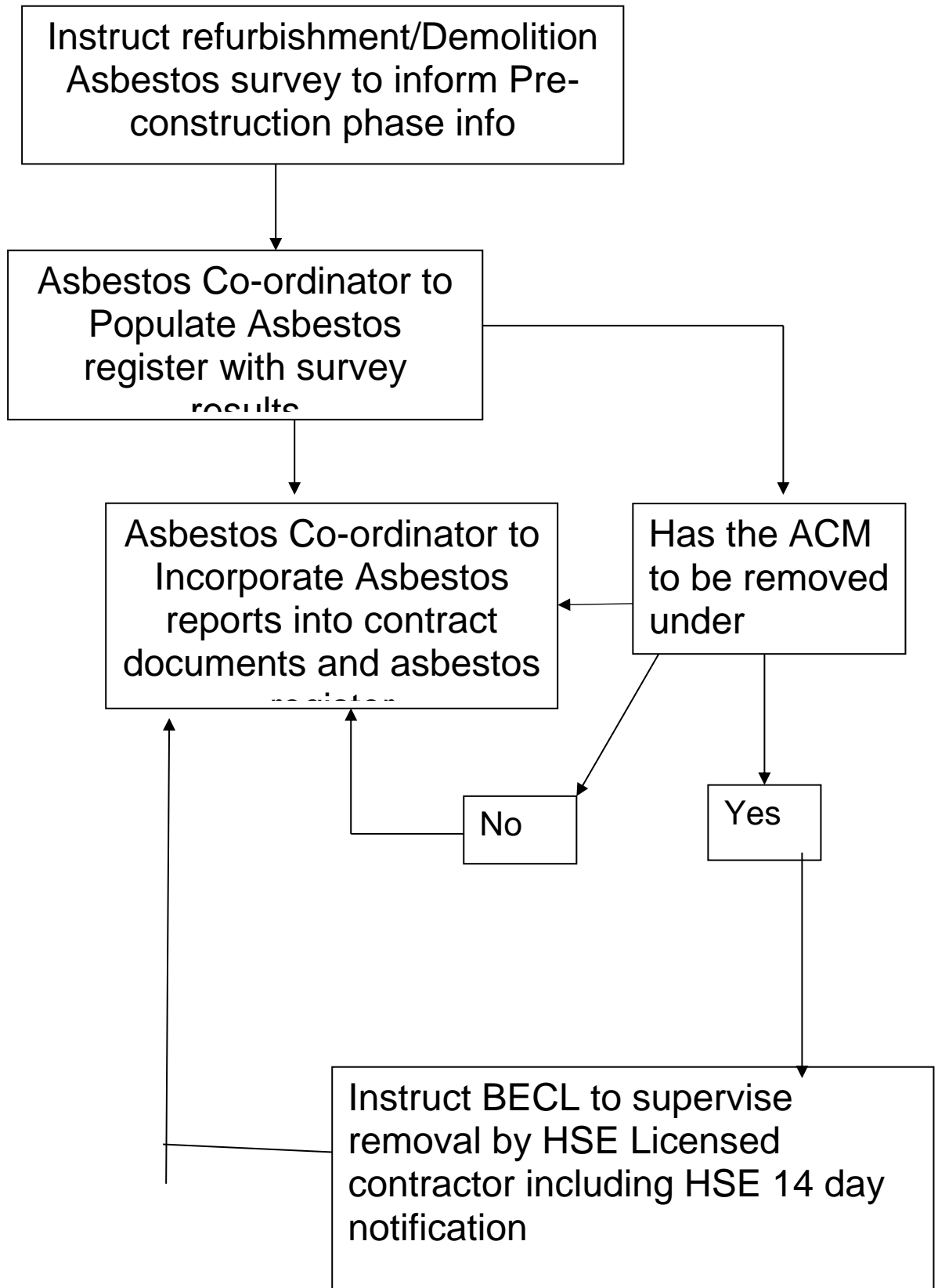
## **Appendix 4**

### **Asbestos flowchart for Planned works**



# **Appendix 5**

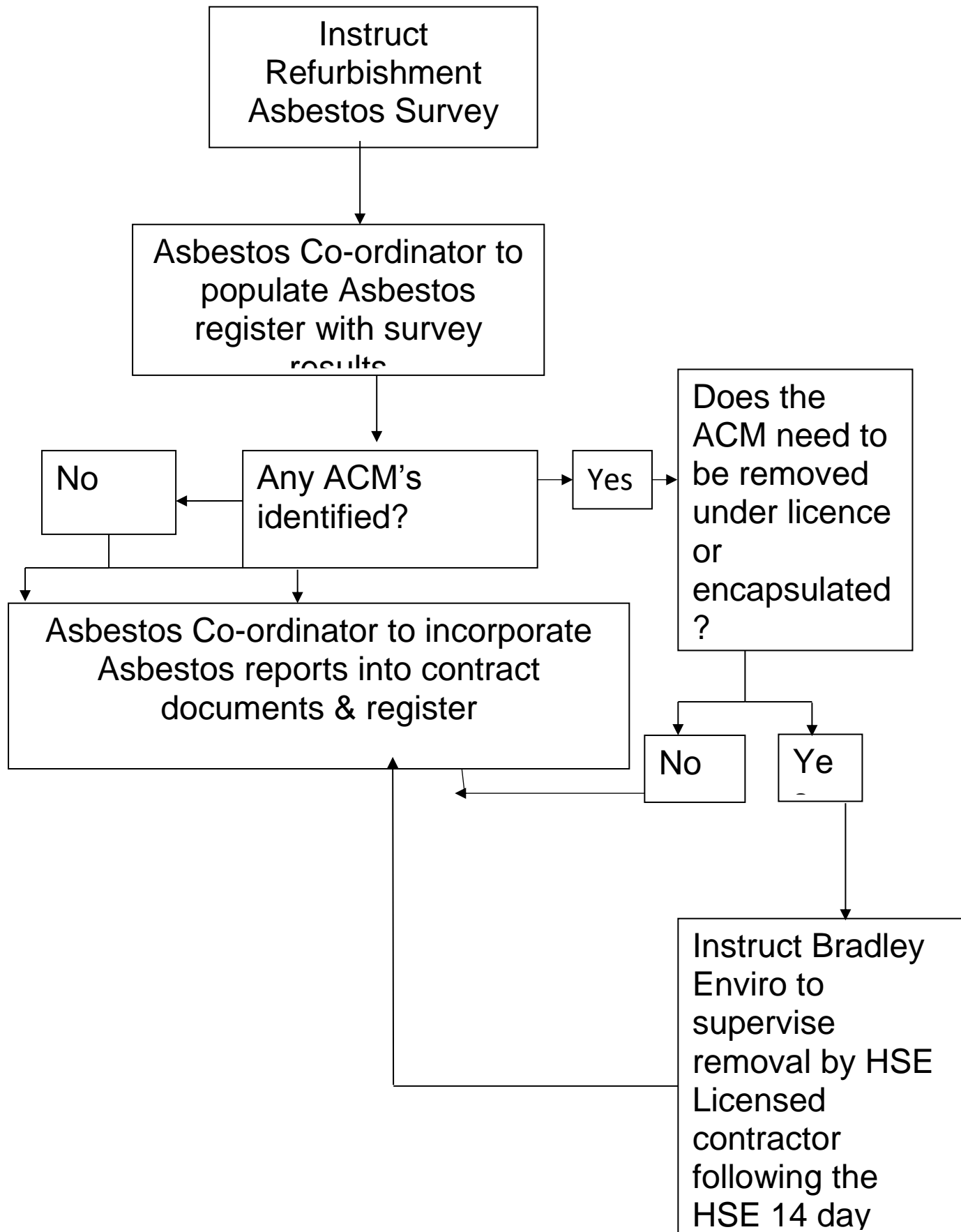
## **Asbestos procedures at Demolition**



## **Appendix 6**

# **Asbestos procedures at Refurbishment works**





# **Appendix 7 HSE Asbestos Emergency Procedures Flowchart**

## Flow chart

