Asbestos Management Policy

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

Our Vision, Our Values, Our Strategic Objectives

Our Vision

A vibrant neighbourhood where everyone can prosper.

Our Values

Caring, Reliable, Fair, Open and Adaptable

Our Strategic Objectives



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 our Equality and Diversity Policy.

We will regularly review this Policy and consider any equalities implications taking the necessary action to address any inequalities (either directly or indirectly) that result from the implementation of this Policy.

Executive Summary

Policy Author

The Director Of Maintenance Services holds the responsibility for developing this policy.

Purpose of the Policy

The purpose of this policy is to provide a clear statement of Elderpark Housing Associations duties and obligations in relation managing the risks associated with preventing the exposure to asbestos, within all buildings owned and managed by Elderpark, where asbestos could be situated.

The effects that can be caused from human exposure to disturbed Asbestos fibres through inhalation, can be devasting in terms of long-term severe health issues and possible fatal asbestos related diseases.

This policy is important in ensuring the health and safety of employees, tenants, residents of Elderpark Housing properties and those who live in the immediate area, work in, or visit their homes and office premises. As a landlord Elderpark Housing has a responsibility to ensure the safety and health of its tenants and others.

This policy sets out how Elderpark Housing will fulfil these duties for managing Asbestos appropriately by reducing the risks of potential disturbance of asbestos containing materials (ACM's) and exposure to asbestos fibres.

Policy Scope

This policy applies to all properties built prior to year 2000 (due to asbestos being out rightly banned in construction leading up to year 2000), which are owned or managed by Elderpark Housing Association (EHA), this includes our offices and places of work (as applicable).

This Policy applies to all Elderpark staff, its customers, owners, contractors and the Management Committee members.

This policy applies to all work streams across the organisation where asbestos could be disturbed.

Aims and Objectives of the Policy

The Association aims to ensure that residents and visitors can enjoy safe access to, and use of, our services and facilities. In addition, to ensure, so far as is reasonably practicable, the safety and welfare of our employees and other persons who may be affected by our activities.

The main objective of the policy is to meet all legal and regulatory obligations and ensure best practice is followed in relation to Asbestos management. It therefore aims to keep staff, the general public, tenants, and contractors aware of the risks associated with asbestos and as far as reasonably practicable, and ensure they are safe from danger.

Regulatory and Legislative Compliance

SHR Regulatory Standards

As a Registered Social Landlord (RSL) the Association must also comply with the Scottish Housing Regulator's (SHR) Regulatory Framework, including the seven Standards of Governance and Financial Management and the Scottish Social Housing Charter.

Relevant to this policy from the Framework and Standard of Governance and financial Management are:

Regulatory Standard 1 (RS1) – '*The governing body leads and directs the RSL to achieve good outcomes for its tenants and other service users'*.

Regulatory Standard 3 (RS3) – *'The RSL manages its resources to ensure its financial well-being, while maintaining rents at a level that tenants can afford to pay'*.

Regulatory Standard 5 (RS5) – *'The RSL conducts its affairs with honesty and integrity'*.

Key Applicable Legislation:

- Health and Safety at Work etc. Act 1974
- Management of Health and Safety at Work Regulations 1999
- Control of Asbestos Regulations (CAR) 2012.
- L143 Approved Code of Practice and guidance - Managing and working with asbestos
- Construction Design and Management Regulations (2015)
- Reporting of Injuries, Diseases or Dangerous Occurrences (RIDDOR) 2013

Further detailed regulations, standards and guidance can be located in the supporting Asbestos Management plan.

Equalities

An Equality Impact Assessment has been carried out and attached to this Policy as Appendix 1. No Equalities issues have been identified as the Policy relates to the management duties to controls asbestos in non-domestic parts of properties and the work required to be complaint with legislation will be applied equally to all properties resulting in no positive or negative impact upon the protected characteristic groups.

Privacy

Record keeping for the purposes of this policy relate to the contract that is in place and undertaking management surveys and asbestos related works in customers properties. This will include contactors having access to tenants' personal details for the purpose of visiting properties and a data sharing agreement is in place. All data will be held in line with GDPR requirements. This Policy is written to be open and transparent in line with FOISA. A GDPR Impact Assessment has been carried out and attached to this Policy as Appendix 2.

Related Policies

Policy Title	Location
Asset Management Policy	Under review
Planned & Cyclical Maintenance Policy	Planned and Cyclical Maintenance Policy
Reactive Repairs Policy	Reactive Repairs
Data Protection Policy	Data Protection Policy
Freedom of Information Policy	FOI and EI Policy

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1. Introduction

1.1 Elderpark Housing recognises that any property owned and managed by the organisation could contain "asbestos containing materials" (ACM's). If disturbed, these can present a major risk to the health, safety and wellbeing of our customers living in our homes, colleagues working in our offices and the wider estate, owners, and people who visit our properties, if it is not managed safely. Asbestos fibres, if breathed in can cause long term asbestos related diseases which can be fatal. Not managing asbestos appropriately can cause financial and reputational risks to our organisation.

1.2 Elderpark Housing is an employer, and a responsible social landlord, and we acknowledge our legal and moral obligations in assessing and reducing the potential risks from the exposure to Asbestos fibres, which can cause ill health, asbestos related diseases and loss of life. The aim of this policy and the supporting Asbestos Management Plan is to provide a robust Asbestos management safety framework which can be implemented to protect the health and wellbeing of Elderpark tenants, owners, staff, and visitors to our properties.

1.3 Elderpark Housing is responsible for ensuring that all properties owned and managed by us, are suitably risk assessed and managed appropriately, and meet all applicable Asbestos management legislation and standards.

2. Purpose of the Policy

2.1 The purpose of this policy, which is supported in more detail by the Asbestos Management Plan, is to:

- Recognise and outline the risks to lives and property associated with the management of Asbestos in all properties owned and managed by Elderpark built before year 2000
- Identify all applicable legislation relating to Elderpark Housing in terms of Asbestos management statutory duties and responsibilities as a social landlord and employer
- Determine the scope of how the policy will apply to Elderpark Housing and how the legislation applies
- Outline the roles, responsibilities and management arrangements we will have in place to manage Asbestos effectively
- Outline how we will implement the policy and how we will assure ourselves that we comply with the legislation and the policy and how we will remain compliant
- Identify specific roles and responsibilities for policy implementation and Asbestos management arrangements
- Ensure that our arrangements for Asbestos management are clear and understood by all employees
- Ensure that we are fair, equitable and non-discriminatory
- Ensure that we can be flexible and adaptable to changing need

3. Policy Scope

3.1 This policy applies to all properties owned and managed by Elderpark, and built before year 2000, this includes our offices and places of work. Where we are not the freeholder of any properties, which are within our control, the responsibility for Asbestos management will be clearly defined within the management agreement.

3.2 This policy applies to all work-related activities of staff and contractors and ensuring there is an awareness for tenants, staff and contractors where asbestos can be disturbed. This also includes asbestos management related work streams e.g. management surveys, refurbishment and demolition (R&D) surveys, licensed work, non-licensed work, notifiable non-licensed work, air testing and monitoring

3.3 This Policy applies to all Elderpark staff and the Management Committee members, given that the Policy outlines the main responsibilities for Asbestos management. This policy also applies to all tenants, owners, contractors and any visitors to our buildings including members of the public.

4. Legal and Regulatory Framework

Regulatory Framework

4.1 The Scottish Housing Regulator's (SHR) main role is to monitor, assess, report and intervene (as appropriate) in relation to social landlords' performance of housing activities and RSLs' financial well-being and standards of governance, in relation to tenants, people who are homeless, gypsy/travellers and factored owners.

4.2 Section 36 of the Housing 2010 Act requires the SHR to issue a Code of Conduct setting out Standards of Governance and Financial Management for RSLs. The SHR has seven standards in place which Elderpark Housing must adhere to and meet. Below are the seven standards. We have indicated next to each standard whether we deem it is applicable to this Asbestos management policy:

4.3 The relevant standards from the SHR Framework and Standard of Governance and financial Management relevant to this policy are:

- **Regulatory Standard 1** (RS1) – '*The governing body leads and directs the RSL to achieve good outcomes for its tenants and other service users'*.
    - **Guidance 1.1** - The governing body sets the RSL's strategic direction. It agrees and oversees the organisation's business plan to achieve its purpose and intended outcomes for its tenants and other service users.
    - **Guidance 1.2** - The RSL's governance policies and arrangements set out the respective roles, responsibilities and accountabilities of governing body members and senior officers, and the governing body exercises overall responsibility and control of the strategic leadership of the RSL.

- **Guidance 1.3** - The governing body ensures the RSL complies with its constitution and its legal obligations. Its constitution adheres to these Standards and the constitutional requirements set out below.
- **Guidance 1.4** - All governing body members accept collective responsibility for their decisions.
- **Guidance 1.5** - All governing body members and senior officers understand their respective roles, and working relationships are constructive, professional and effective.
- **Guidance 1.6** - Each governing body member always acts in the best interests of the RSL and its tenants and service users and does not place any personal or other interest ahead of their primary duty to the RSL.
- **Guidance 1.7** - The RSL maintains its independence by conducting its affairs without control, undue reference to or influence by any other body (unless it is constituted as the subsidiary of another body).

- **Regulatory Standard 3** (RS3) – *'The RSL manages its resources to ensure its financial well-being, while maintaining rents at a level that tenants can afford to pay'*.

  - **Guidance 3.1 -** The RSL has effective financial and treasury management controls and procedures, to achieve the right balance between costs and outcomes, and control costs effectively. The RSL ensures security of assets, the proper use of public and private funds, and access to sufficient liquidity at all times.
  - **Guidance 3.2 -** The governing body fully understands the implications of the treasury management strategy it adopts, ensures this is in the best interests of the RSL and that it understands the associated risks.
  - **Guidance 3.3 -** The RSL has a robust business planning and control framework and effective systems to monitor and accurately report delivery of its plans. Risks to the delivery of financial plans are identified and managed effectively. The RSL considers sufficiently the financial implications of risks to the delivery of plans.

- **Regulatory Standard 5** (RS5) – *'The RSL conducts its affairs with honesty and integrity'*.

  - **Guidance 5.1** - The RSL conducts its affairs with honesty and integrity and, through the actions of the governing body and staff, upholds the good reputation of the RSL and the sector.
  - **Guidance 5.2** - The RSL upholds and promotes the standards of behaviour and conduct it expects of governing body members and staff through an appropriate code of conduct. It manages governing body members' performance, ensures compliance and has a robust system to deal with any breach of the code.
  - **Guidance 5.3** - The RSL pays due regard to the need to eliminate discrimination, harassment and victimisation, and advance equality of opportunity and human rights, and fosters good relations across the range of protected characteristics in all areas of its work, including its governance arrangements.

Legal Framework

4.4 Elderpark Housing will comply with all relevant legislation and regulatory requirements for managing Asbestos management. Set out below is the principal legislation which applies to Asbestos management for Elderpark Housing (please refer to the supporting Asbestos Management Plan for all associated detailed standards and guidance):

4.5 **The Health and Safety at Work Act 1974 (HASAWA); General Duty on Employers** This primary Health and Safety legislation imposes a general duty on employers to ensure the health, safety, and welfare of their employees at work, so far as reasonably practical. This statutory duty is also applicable to "others" who may be affected by the employer's undertakings (i.e., work activity), such as contractors, tenants, neighbours, owners, visitors, and members of the wider general public.

4.6 **The Management of Health and Safety at Work Regulations 1999** section 3, sets out the duty for every employer to make a suitable and sufficient risk assessment of the risks to health and safety of all of their employees whilst at work and other people not in their employment.

4.7 The **Control of Asbestos Regulations 2012** was made under HASAWA and strengthens the protection given to those who might be exposed to asbestos fibres by setting clear health and safety requirements to ensure appropriate control measures are in place to prevent exposure to asbestos from work activities which could disturb asbestos containing materials. In particular, Regulation 4 '*The duty to assess and manage asbestos in non-domestic premises'* places a duty on Elderpark to manage asbestos in:

- all non-domestic buildings e.g. garage sites and commercial buildings
- the common areas of domestic buildings including hallways, lift shafts, service ducts and roof spaces (this list in not exhaustive)

4.8 In addition, work activities with the potential to disturb the fabric of any building must have a suitable and sufficient asbestos assessment as required, to comply with The Control of Asbestos Regulations 2012; 'Regulation 5 Identification of the presence of asbestoses.

4.9 **L143 Approved Code of Practice (ACOP) Managing and working with Asbestos,** further supports the control of asbestos regulations and is published by the Health and Safety Executive which sets out in more detail what duty holders are expected to do in order to comply with the legal requirements. Elderpark is a duty holder in relation to the Control of Asbestos Regulations 2012

4.10 **The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR).** Exposure to asbestos is reportable under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) when a work activity causes the accidental release or escape of asbestos fibres into the air in sufficient quantity to cause damage to health. If work on asbestos is done without suitable controls, or precautions

fail to control exposure, these are 'dangerous occurrences' under RIDDOR and should be reported.

4.11 **The Construction (Design and Management) Regulations 2015 (CDM).** These regulations include requirements for clients and principal designers to work together in assessing the adequacy of existing information, including an asbestos survey, before starting any construction project that could disturb asbestos. The regulations also require information on asbestos-containing materials to be provided at an early stage as part of a package of information to mitigate and manage health and safety risks.

5. Aims and Objectives of this Policy

5.1 The aim of this policy is to ensure that we recognise our duty to manage asbestos under regulation 4 of the control of asbestos regulations to minimise the risk of disturbing asbestos in any of our properties and the exposure of asbestos fibres to staff, customers, contractors and members of the public. When Asbestos incidents occur, they could lead to severe ill health, injury or loss of life. In addition, we aim to ensure, so far as is reasonably practicable, the health, safety and welfare of our employees and other persons who may be affected by our activities in relation to Asbestos management in line with overarching health and safety law.

5.2 Our objectives are to interpret all applicable legislation and standards to Elderpark Housing as an employer and registered social landlord for Asbestos management, this includes CDM regulations where we are responsible for ensuring there is suitable survey information for any building where asbestos could be disturbed in any of our activities as an organisation. Our main objective is to implement these Asbestos management arrangements to minimise the risk of asbestos disturbance and exposure which can lead to ill health, injury, loss of life and ensure we promote a good level of Asbestos awareness for all applicable stakeholders to ensure the arrangements are delivered effectively, and what to do in the event that an Asbestos incident occurs.

6. Roles and Responsibilities

6.1 **The Management Committee**, in approving this policy, acknowledges that it accepts full responsibility for its implementation. Day-to-day responsibility for the operation of this policy is the responsibility of the Chief Executive with assistance from the Departmental Directors, Managers and operational staff.

6.2 **The Chief Executive with assistance from the Governance and Compliance Manager must:**

- Ensure that the requirements of the policy are communicated to all staff and reinforced on a regular basis.
- Ensure that all staff and Management Committee receive adequate Asbestos awareness training and are encouraged to develop and promote safe working practices and

attitudes towards Asbestos management in all work and business activities which could disturb asbestos.

- Liaise with local authorities and the Health and Safety Executive (HSE) on matters relating to Asbestos management including taking any actions resulting from their advice.
- Monitor and report to the Management Committee with any recommendation regarding Asbestos management
- Ensure staff receive Asbestos management training, as the training needs analysis dictates.

6.3 **The Chief Executive, assisted by The Director of Maintenance Services and Maintenance Services Manager, must:**

- Ensure compliance with legislation regarding the duty to manage asbestos in non-domestic areas is fulfilled, which requires all non-domestic buildings and parts of buildings require a management survey and re-inspection as required
- Manage the Asbestos database and survey programme, removal work, and any work associated with asbestos in buildings owned and managed by Elderpark.
- Ensure a robust database is continuously maintained with all survey information relating to asbestos of known locations and condition. All information should be updated with new information, and this should be made available to all staff and contractors who could disturb asbestos prior to work or any other activity which could disturb asbestos commencing.
- Ensure a suitable and sufficient Asbestos Management Plan is in place and regularly updated, which is required by law.
- Ensure all persons or contractors carrying out any work or activity in Elderpark's properties which could disturb asbestos have annual asbestos awareness training as a minimum level and are supplied with suitable and sufficient asbestos survey information relating to the property and task to enable work to be carried out without disturbing asbestos.
- Ensure that all Asbestos surveys are carried out by UKAS accredited competent and experienced contractors.
- Ensure systems and contracts are in place for up-to-date advice to be received on current and proposed Asbestos related regulatory and good practice requirements.
- Ensure that all appropriate staff receive adequate Asbestos management awareness training according to their role and are encouraged to develop and promote safe working practices and attitudes towards Asbestos management.

6.4 **The Chief Executive, assisted by The Director of Housing & Customer Services and Housing Manager, must:**

- Ensure that regular estate management inspections are carried out and where a potential Asbestos risk is identified appropriate actions are taken to mitigate these risks.
- Ensure that access to domestic properties is sufficiently supported to enable asbestos related works to be completed in line with the Scottish Secured Tenancy Agreement.

- Ensure that the requirements of the policy are communicated to all relevant staff and tenants and reinforce such communication on a regular basis via Elderpark Housing's website, tenant newsletter and social media.
- Ensure that all appropriate staff receive adequate Asbestos Management awareness training according to their role and are encouraged to develop and promote safe working practices and attitudes towards Asbestos Management.

6.5 Every employee of Elderpark Housing has a health and safety responsibility and duty with regard to arrangements made for maintaining their own safety in the activities they carry out and responding to emergency situations. Directors and Managers have responsibilities as well as those of an employee.

6.6 Any breaches of the policy should be reported to the employee's Manager.

7. Asbestos Management Arrangements

7.1 The Asbestos Management Plan which supports this policy, contains further detailed management arrangements in how Elderpark Housing will comply with all applicable Asbestos legislation and this policy. The supporting management plan should be read in conjunction with this policy. Listed below are the key arrangements Elderpark Housing will have in relation to Asbestos Management:

- We will comply fully with all relevant legislation, regulations, ACOP's, Standards and Guidance related to asbestos applicable to the properties we own and manage.

- We will ensure that we identify all properties owned or managed by Elderpark which are classed as non-domestic in line with the Control of Asbestos Regulations. This will form the overarching database of all properties which require a management survey in line with regulation 4 of CAR 2012. This will enable us as a duty holder for these properties to identify the location and condition of ACM's and prevent the risk of harm to anyone working, living in or visiting the properties.

- We will ensure all work relating to asbestos is carried out by competent contractors for example all asbestos surveys will be completed by a UKAS accredited contractor. There are different types of work associated with asbestos (licensed, non-licensed and notifiable non licensed) we will ensure these types of work are only completed by appropriately qualified and competent contractors.

- We will ensure, prior to any works commencing in either domestic or non-domestic settings, that we have suitable and sufficient asbestos information in place to inform that work activity to enable it to proceed safely, including management surveys and R&D surveys where required. All survey data will be recorded within our overarching asbestos database which we will continually update and manage with live information. This will enable us as a duty holder to comply with regulation 5 of CAR to not proceed with any work until we identify if asbestos is present.

- We will robustly maintain an up-to-date asbestos register of all asbestos data, recording the location, condition, exposure risk, maintenance activity and remedial / removal works.

- We will ensure that there are clearly appointed accountabilities, roles, and responsibilities to manage asbestos safely across the business, including a duty holder and responsible person. We will also ensure we have in place an Asbestos Management Plan (AMP) which is required by law.

- We will ensure there are suitable levels of governance, oversight, and supervision to implement this policy and the associated Asbestos Management Plan which should be read in conjunction with this policy.

- We will ensure that all relevant staff receive appropriate training, including specialist roles and general awareness for Asbestos safety management.

- We will ensure suitable and sufficient resources are in place to effectively manage customer relationships and tenancy agreements to gain timely access to customers' homes for any work associated with asbestos surveys or remedial works.

- We will ensure there are sufficient levels of assurance in place to evidence we are complying with all relevant legislation, standards, our policies, Management Plan and associated procedures in relation to managing asbestos safely.

- We will identify and record ACMs found on the premises we own and manage and evaluating the risk on the basis of the best competent advice available.

- We will Periodically inspect and assess the condition of ACMs within its premises, updating the register and reassessing the risk accordingly.

- We will repair, encapsulate or remove ACMs where the condition creates an unacceptable risk.

- We will Implement effective emergency procedures for the management of uncontrolled, unexpected or unplanned release of asbestos fibres.

- We will Provide effective response to incidents of suspected, previously unidentified or damaged asbestos.

- We will ensure that we manage data robustly and respond promptly to failures in systems and data management, to assure ourselves that we are accurately and robustly fulfilling our statutory responsibilities as an employer and a landlord relating to managing asbestos safely across the business and sharing information as appropriately with anyone who could disturb asbestos.

- We will Monitor and review the effectiveness of the policy and the asbestos management plan

- We will ensure we work with all regulatory, statutory and enforcing authorities, including the Scottish Housing Regulator (SHR), the Health and Safety Executive (HSE) and local authorities.

8. Training and Awareness

8.1 Elderpark Housing will ensure that all colleagues will receive general Asbestos awareness training as required, in relation to their role, and where they will work.

8.2 Elderpark Housing staff who have specific roles relating to Asbestos Management will receive appropriate training to ensure that they are competent to fulfil their duties.

9. Implementation of the Policy

9.1 Elderpark Housing will have suitable and sufficient levels of oversight, governance, and assurance in place to ensure that we fulfil all legal obligations relating to Asbestos management and to assure ourselves that we comply with this Asbestos management Policy, the supporting Management Plan and all applicable legislation. The levels of Governance and Assurance we have in place are:

- The Management Committee
- The Senior Management Team
- The Operational Management Team
- The Finance, Audit and Risk Sub Committee
- The Housing and Maintenance Sub Committee
- The externally appointed third party auditor

9.2 Further detail of the governance and oversight arrangements we have in place, including how we will gain assurance of policy implementation and compliance, are included within the Asbestos Management Plan which supports this policy.

10. Monitoring of the Policy

10.1 Operational Managers will be responsible for the day-to-day management of all work streams and programmes of work associated with Asbestos management. They will be responsible for:

- Ensuring operational management information is in place to evidence work is being completed within the required timescales and to the required standards to give assurance they are working to this policy, the supporting management plan and all applicable Asbestos legislation and standards.

- Providing such information to enable the relevant Manager / Director to submit a quarterly performance report to the Senior Management Team and subsequently onward to the Management Committee, including relevant Asbestos management KPIs and assurance information.

10.2 In addition to the operational assurance measures outlined above, Asbestos management will also be subject to internal and external audits, as required, to provide suitable assurance.

10.3 Further detailed performance and assurance information can be found in the supporting Asbestos Management Plan.

11. Complaints and Appeals About the Policy

11.1 All complaints regarding this policy or its implementation will be handled under our Complaints Handling Policy and Procedure which can be found on our website or from our offices.

12. Review

12.1 This Policy will be reviewed every 5 years but will be subject to earlier review if there are any significant changes in legislation, good practice or operational changes, which may affect the content of this policy.

Appendix 1 - Equality Impact Assessment

Name of Policy to be assessed	Asbestos Management Policy	**New policy or revision of existing?**	Review
Person(s) responsible for assessment		Kerry Clayton	
1. Briefly describe the aims, objectives and purpose of the policy.	The purpose of this policy is to set out how Elderpark Housing will ensure that residents and visitors should enjoy safe access to, and use of, our services and facilities. In particular, to ensure, so far as is reasonably practicable, the safety and welfare of our employees and other persons who may be affected by our activities in relation to Asbestos management. The main objective of the policy is to meet all legal and regulatory obligations and ensure best practice is followed in relation to Asbestos management. It therefore aims to: Keep the general public, tenants, and employees safe from the risks associated with Asbestos being disturbed and Asbestos fibres being released and exposure of those fibres to anyone who could come into contact with them.		
2. Who is intended to benefit from the policy? (e.g. applicants, tenants, staff, contractors)	The policy sets out to benefit tenants to ensure the risk of exposure to asbestos is minimised. It further intends to benefit staff, contractors and members of the public who are visiting and working within Elderpark properties. It will also benefit the association in ensuring legal obligations are met and protecting ACM's from being disturbed.		
3. What outcomes are wanted from this policy? (e.g. the measurable changes or benefits to members/ tenants / staff)	To ensure that the association is compliant with Asbestos legislation and Regulatory guidance and through robust risk assessments, monitoring and maintenance, our procedures and programmes continue to be compliant and managed thus mitigating the risks to staff, tenants' contractors and the general public relating to ill health or loss of life from exposure to harmful Asbestos fibres.		
4. Which groups could be affected by the policy? (note all that apply)			
Age		**Disability**	
Gender reassignment		**Marriage and Civil Partnership**	
Pregnancy and Maternity		**Race**	
Religion or Belief		**Sex**	
Sexual Orientation			
5. If the policy is not relevant to any of the equality groups listed above, state why and end the process here.			
The policy is applied equally to all properties with the aim of preventing exposure to Asbestos fibres in all properties constructed before year 2000 and ensuring safety for all equally and therefore has no positive or negative impact upon any of the above.			
6. Have those affected by the policy / decision been involved?			
		Positive Impact(s)	**Negative Impact(s)**

7. Describe the likely positive or negative impact(s) that the policy could have on the groups identified above.	See section 6 above	None anticipated
8. What actions are required to address the impacts arising from this assessment? (This might include additional data, putting monitoring in place, making adjustments, taking specific action to mitigate any potentially negative impacts)	No further action required.	
Signed:	*Kerry Clayton*	
Dated:	10/10/24	

Appendix 2 - GDPR Impact Assessment

Name of Policy to be assessed	Asbestos Management Policy	**New policy or revision of existing?**	Review
Person(s) responsible for assessment		Kerry Clayton	
Briefly describe the aims, objectives and purpose of the policy.	The purpose of this policy is to set out how Elderpark Housing will ensure that residents and visitors should enjoy safe access to, and use of, our services and facilities. In particular, to ensure, so far as is reasonably practicable, the safety and welfare of our employees and other persons who may be affected by our activities in relation to Asbestos management. The main objective of the policy is to meet all legal and regulatory obligations and ensure best practice is followed in relation to Asbestos management. It therefore aims to: Keep the general public, tenants, and employees safe from the risks associated with Asbestos being disturbed and Asbestos fibres being released and exposure of those fibres to anyone who could come into contact with them.		
Which type of data will be used by implementation of this policy? (e.g. personal, sensitive or special category)	Details of the properties will be used when implementing this policy and the personal details of tenants will be used by staff and contractors who are responsible for contacting tenants to organise asbestos related work to enable implementation of the policy.		
What outcomes are wanted from this policy? (e.g. necessary to meet legal obligations)	This policy is written in line with our Data Protection Policy and GDPR legislation to ensure compliance with GDPR / FOISA. The outcomes are reducing the risk of harm caused by Asbestos fibres, if inhaled.		
Which groups could be affected by the policy? (note all that apply)			
Tenants	✓	**Committee**	✓
Employees	✓	**Contractors**	✓
If the policy is not relevant to any of the data groups listed above, state why and end the process here.			
The Policy is relevant to all of the above groups as tenants' data will be shared with contractors for the purpose of visiting and carrying out work, this would be inclusive of any Committee who are also tenants. Employees implementing the policy will be responsible for ensuring GDPR regulations are adhered to when sharing data. And contractors are bound by data sharing legislation when handling tenant's information.			
Have those affected by the policy / decision been involved?			
No.			
Describe the likely positive or negative impact(s) that the policy could have on the groups identified above.		**Positive Impact(s)**	**Negative Impact(s)**
		Tenants can be assured the association is meeting legal obligations by implementing the policy	

What actions are required to address the impacts arising from this assessment? (This might include additional data, putting monitoring in place, making adjustments, taking specific action to mitigate any potentially negative impacts)	Effective monitoring systems to be put in place and accurate record keeping.
Signed:	*Kerry Clayton*
Dated:	10/10/24