



Policy Outline

Asbestos Management Policy

OVERALL PURPOSE

This document sets out the approach of West North West homes Leeds to ensure the safe management of asbestos present in all the buildings and properties owned, occupied, and otherwise managed, by West North West homes Leeds.

INTRODUCTION

The document has been produced under the framework of West North West homes Leeds' Health and Safety Policy in order to :

- Provide specific detail of the Leeds West North West Homes' commitment to ensure safe management of asbestos.
- Set out arrangements necessary to achieve safe management.
- Provide detailed procedures for the conduct of activities that involve contact or work either with or in the vicinity of **Asbestos Containing Materials (ACMs)**.

Asbestos is a generic term used to describe a group of mineral silicates that occur naturally in seams or veins as long thin crystalline fibres and fibre bundles. The fibres have been used in building materials and other products due to their physical and chemical properties that make them ideal for a wide variety of uses.

The fibres have high tensile strength, are flexible, have good resistance to chemical attack, high thermal stability, low thermal conductivity, and do not conduct electricity. These properties led to the widespread use of asbestos for thermal and acoustic insulation along with fireproofing products. Other products in which asbestos is commonly found include electrical components, friction linings, floor tiles, sheets and boards including asbestos cement sheets and asbestos insulating board ceiling tiles, asbestos cement pipes and flues, roofing products including asbestos cement slates and asbestos containing roofing felts, and asbestos textile products including fire blankets and heat protective suits and oven gloves.

Asbestos related lung diseases, mainly cancers can result from inhaling fibres, which kill more people than any other specific work related illness. The disease can take from 15 to 40 years to develop so that individuals exposed to fibres are not immediately aware of any change in their health. There are no known cures for asbestos related diseases.

Provided that asbestos products in buildings are in good condition and sealed, or

otherwise protected, and not in a position so as to be not vulnerable to damage then they are unlikely to release fibre, and as such are safe to leave in place. This is an issue which is recognised by West North West homes Leeds and which represents a major consideration and influence in the formulation of this document. Furthermore, West North West homes Leeds recognises that the unnecessary removal of asbestos that is in good condition is a misuse of financial resources and is a practice that could in fact lead to an increased risk of exposure in the short term.

This document replaces all previous asbestos management policy and procedure documents previously adopted by Leeds West Homes and Leeds North West Homes.

Service Standards

1. We will inform you in writing within 2 working days of our receiving a referral for an asbestos survey explaining why the survey is required and provide you with our contact details should you have any queries or concerns.
2. We will complete and return interim survey reports within 5 working days from receipt of referrals.
3. We will inform you in writing of when a referral for asbestos removal has been received within 2 days and provide you with our and our contractor's contact details and a copy of our Asbestos Information Leaflet.
4. We will complete the removal of asbestos within 17 working days, using licensed contractors.
5. Where a repair is an emergency, we will test material samples within 24 hours.

PERFORMANCE MEASURES

	Performance Measure	Year End Target 09/10
ASS1	Average length of time taken to return survey interim report	5 days
ASS2	% Letters sent to customers upon receipt of Survey referral	100%
ASS3	% Letters sent to customers upon receipt of Removal referral	100%

Customer Service Policy

1.0 Statement of Intent

West North West homes Leeds are committed to comply with all Legislation, approved codes of practice and all Health and Safety Executive Guidance Notes relevant to the safe management of asbestos across the whole range of its services. As a result West North West homes Leeds is committed to;

- Take all measures necessary to ensure that any possible exposures to asbestos is reduced to the lowest levels reasonably practicable
- Facilitate a coordinated approach to the Safe Management of asbestos in all West North West homes Leeds assets, West North West homes Leeds Property Investment Planned Maintenance team will manage the gathering of information relating to **Asbestos Containing Materials (ACMs)** within buildings that it manages and occupies and that Leeds City Council will project manage any major rectification works on it's behalf.

2.0 Outline of Service

2.1 West North West homes Leeds will ensure that:

- It will not use any product or material containing asbestos in future work on property or in the delivery of services.
- Appropriate surveys are commissioned to identify the presence of asbestos in all the buildings under its ownership and management moreover WNWhL will maintain this information within an asbestos management database.
- Establish procedures to ensure that information in relation to the occurrence of asbestos in its buildings is provided to all appropriate persons who have the possibility of disturbing the materials.
- Label (**Asbestos Containing Materials**) ACMs in all circumstances considered appropriate.
- Where asbestos is identified as being present in a building, risk assessments will be undertaken by the asbestos surveyor to define the risks posed by the asbestos. Where the ACMs are found to be in good condition and without risk to any building or room occupiers/users the general presumption will be leave the material in place and to manage it for the future in accordance with a defined management plan.
- Where asbestos materials are found to be in a condition where removal or other remedial works are considered to be necessary, sufficient budgetary provision is made to conduct these works.
- Whenever any building alteration, refurbishment, demolition or routine maintenance works are to be undertaken, no works will commence until the presence of any ACMs in the buildings concerned is fully understood and all associated costs are included in the project or maintenance costs.

Item 4.2.3
Appendix 1

- Whenever any works result in the removal or change in condition of any identified ACMs, these changes are recorded in the Asbestos Management System database.
- No change of use of any room or building will be implemented until the full implications of any ACMs present are considered and the assessments of risk amended to take account of these changes in circumstances.
- All works with ACMs will only be undertaken by competent contactors holding an appropriate License under the provisions of the Asbestos (Licensing) Regulations 1983 (as amended).
- Where any multi-trade works are to be undertaken in premises, information will be provided to any persons who are in the vicinity, or likely to be affected by the works, as part of the overall strategy to ensure that they are not exposed to any asbestos risk.
- Appropriate emergency procedures will be followed in the event of any inadvertent disturbance of ACMs in any of the buildings under their control.
- Appropriate Health Surveillance Procedures are put in place and activated in any situations where risk assessments or other exposure evaluations show that employees or where appropriate any other persons may be or have been exposed to the Action Levels as detailed in the Control of Asbestos Regulations 2006 (CAR 2006).
- Appropriate procedures are put in place to ensure that all asbestos waste is disposed of in accordance with the Hazardous Waste Regulations 2005 and is transported to an appropriately licensed waste management site by Registered Waste Carriers.
- West North West homes Leeds' approved Environmental Analyst will supervise any removal and encapsulation works undertaken by licensed contractors.
- Contractor/Project Managers will forward the appropriate documentation to **WNWHL Asbestos Manager (AM)** on the completion of any works on ACMs to be filed on the appropriate documents.
- All employees, who have involvement with works involving ACMs or any management responsibilities for rooms or buildings containing ACMs, will receive training appropriate to their level of involvement in these functions.

2.2 The Asbestos Management Structure of West North West homes Leeds (Duties and Responsibilities)

2.2.1 Chief Executive

In line with the WNWhL Health and Safety Policy the ultimate responsibility for ensuring compliance with West North West homes Leeds Asbestos Management Policy rests with the Chief Executive.

The Chief Executive will ensure that the Property Investment Services Division carries out the asbestos management role and the Head of Service is provided with all necessary resources, within their own portfolio, to meet the

objectives set out in the Corporate Asbestos Management Policy and their specific responsibilities under these organisational arrangements.

Having made sure that all necessary resources have been provided to the Head of Service, the Chief Executive will ensure that the Head of Service complies with their duty of the safe management of asbestos within their portfolios and as such are accountable.

The Chief Executive will, on an ongoing basis, ensure that the safe management of asbestos is promoted across the whole of the WNWhL undertakings.

The Chief Executive will ensure that Board Directors of West North West homes Leeds are appraised, regularly as necessary, in relation to progress with the management of asbestos including updates on legislative requirements and associated HSE Guidance relating to asbestos and with which West North West homes Leeds has to comply.

2.2.2 Head of Service (Property Investment)

The responsibility of the Head of Service is to ensure compliance with Health and Safety Legislation and implementation of safe working practices and procedures within their respective service areas are detailed in the West North West homes Leeds Health and Safety Policy. This document addresses their specific duties in relation to the safe management of asbestos in full compliance with the Statement of Policy as formally adopted by the Board of Directors.

The Head of Service will:

- be responsible for the safe management of asbestos, in full compliance with all relevant legislation, approved codes of practice, Health and Safety Executive Guidance Notes, relevant governmental advice and the West North West homes Leeds Asbestos Management Policy, for all buildings and undertakings under their management.
- hold the responsibilities of the “Duty Holder” for the purposes of compliance with Regulation 4 of CAR 2006.
- identify appropriate persons within their areas of responsibility to whom the functions of the “Duty Holder” as prescribed by Regulation 4 of CAR 2006 can be delegated to ensure that the required duties can be complied with on a day-to-day basis.

With regard to West North West homes Leeds: the person to whom the “Duty Holder” functions are delegated will generally be the person in day-to-day control of the building in question i.e. the Surveyor, Housing or Voids Officer.

The Head of Service will ensure delegated “Duty Holders” are, provided with training to acquire the necessary skills to undertake these duties, and provided with the requisite resources and authority to ensure that they can effectively discharge them.

The Head of Service will adopt the detailed procedures as set out in the appendices of this document to ensure that the requirements of Regulation 4 of CAR 2006 and West North West homes Leeds Asbestos Management Plan are complied in all respects for their respective service areas.

2.2.3 Contracts Compliance Team (CCT)

The PMT will manage asbestos across the full range of West North West homes Leeds property stock and to whom “Duty Holder” responsibilities have been delegated will ensure so far as is reasonably practicable that:

- A copy of the asbestos register and the associated survey report is held for each of the properties managed by West North West homes Leeds and that this can be referred to at all times by any person who may need access to the information.
- The conditions of the identified ACMs are regularly checked as part of the routine management of the premises.
- Information relating to the presence of ACMs in the building has been conveyed to all persons who may have a need to know.
- Whenever there is a change in the condition of any ACM that the relevant information is conveyed to Property Services Project Manager (Asbestos).
- Whenever the change of condition of any ACM in the building has been identified, the surveyor will ensure that the request for any necessary maintenance work is conveyed to an approved asbestos contractor and that the required works are undertaken within a reasonable period of time such that no one is put at risk.
- Where the approved contractor considers that any particular ACM has been damaged to an extent that persons utilising the area of concern may be exposed to elevated levels of airborne asbestos fibre then the Asbestos Manager (AM) shall implement the West North West homes Leeds Emergency Asbestos Procedure.
- Whenever there is proposed change of use for any particular building or part of building the AM will ensure that a reassessment of the risk arising from the presence of an ACM has been undertaken and consult with BDS to ensure that there is no additional risk involved.
- No intrusive work is to be undertaken (e.g. drilling into walls, cutting, lifting of duct covers, work in suspended ceilings, etc) by any person without completing a Asbestos Referral form prior to undertake intrusive works.

- Where ACMs have been identified in walls and ceilings, the tenant should be advised that no invasive fixings (e.g. screws, etc) are used in these areas. .

2.2.4 Duties of all Employees

Every employee of West North West homes Leeds will:

- Take reasonable care for the health safety and welfare of themselves and that of others who may be affected by their activities in relation to any contact or involvement with ACMs in buildings.
- Immediately report to their Line Manger any damage or disturbance of ACMs or suspected ACMs that they may become aware of.
- Cooperate in the implementation of West North West homes Leeds Asbestos Management Policy, organisational arrangements and procedures.
- Comply with any working procedure so as to ensure that their own exposure to airborne asbestos fibre, and that of others, who may be affected by their activities, is kept to a level, which is as low as reasonably practicable.
- Cooperate in any investigations in relation to any uncontrolled release of asbestos fibre into the working environment.

2.3 West North West homes Leeds Asbestos Management Plan

West North West homes Leeds recognises the hazards presented by exposing people to asbestos fibres and that it has a duty of care to manage ACMs present within its estate and operations to prevent this. This asbestos management plan has been developed to outline how West North West homes Leeds intends to manage the process.

2.3.1 Management philosophy

West North West homes Leeds intends to prevent respiratory exposure of any person to airborne asbestos fibres from ACMs, as a result of its presence within its estate or caused by operations upon it, so far as is reasonably practicable, by good management and by operating safe systems of work.

To achieve this, a pro-active system of surveying will be carried out to identify the location and condition of ACMs within all of West North West homes Leeds estates. Following positive identification of an ACM, a risk assessment will be undertaken which will identify suitable management and control actions to be adopted to prevent exposure.

All asbestos materials will be marked to facilitate identification.

All staff will receive an appropriate level of training for the competence, relating to asbestos that is needed.

2.3.2 Day to day management of asbestos

Surveying

- A letter explaining why a survey is required will be sent to all occupied properties with the surveying contractors contact details and will include strap lines for Equality and Diversity.
- All buildings (except general purpose housing where a representative sample based on construction type and age will be used) managed and occupied by West North West homes Leeds will be having an MDHS type 2 surveys undertaken by an authorised surveyor. This will be prioritised by AM on the likelihood of the building to contain ACMs. The data collected will be entered into Leeds City Council/ALMO Asbestos Management System (AMS) database and an electronic and paper copy forwarded to WNWhL Asbestos Manager And asbestos Team.
- The database will contain details of all known ACMs together with results of sampling that confirm asbestos is or is not present.
- Following positive identification of an ACM both material and priority risk assessments will be completed. This will assess the likelihood of fibres being released along with the probability of individual exposure to asbestos fibres enabling management and control measures to be specified for each ACM.
- Minor maintenance works are all works that are not refurbishment or demolition works that do not involve structural reorganisation of a building but could involve drilling cutting or breaking into walls ceilings or floors within any of West North West homes Leeds' buildings.
- If no information is available from the asbestos management database then a full type 2 survey of the property will be carried out via WNWhL Asbestos Manager.

Refurbishment and demolition works

- Prior to all refurbishment/capital works, project managers/contract administrators acting as agents on behalf of WNWhL will check Asbestos Data Base (AMS) for surveys that have already been carried out.
- Prior to all unoccupied refurbishment works and all demolitions a (MDHS Type 3) survey of the area will be undertaken before work commencement. If the property is occupied then a Refurbishment Survey will be undertaken with the areas where a break into the building structure is required having a localised invasive survey.
- Prior to the commencement of refurbishment or demolition works, as much asbestos (by volume) reasonably practicable will be managed/removed. These enabling works will be project managed by

both the authorised contractor and project managers/contract administrators

Rectification works on ACMs

- AM will project manage where surveys or emergency necessitate removal or repair of ACMs. Competent and appropriately qualified contractors will undertake these rectification works. Major rectification works will be carried out under the supervision of supervising environmental analyst.
- The notification of the Health and Safety Executive will be undertaken by the contractor concerned for programmed works. West North West homes Leeds will contact an approved contractor, who will provide notification in the event of an emergency in the form of a waiver along with a supporting letter from West North West homes Leeds.
- All asbestos waste will be removed from site by an appropriate waste carrier and disposed of at an established disposal site.
- upon the issue of the certificate of reoccupation, then all documentation will be sent for final filing to the Local Housing Office to be archived following updating of the asbestos management database.

Selection of contractors

- All contractors required to work upon ACMs will be engaged from the pre-selected authorised contractors list. This will ensure that the contractors are competent and have the appropriate pre-qualification credentials. Framework contractors acting as Main Contractors will be allowed to use LCC approved sub-contractors.

Action in the event of an emergency

- The principle of managing a disturbance of asbestos is detailed in the Asbestos Management Procedures. The area will be isolated and all persons prevented from accessing the area.

Training

- All employees and Board Members of West North West homes Leeds will receive the appropriate training for the level of competence required in relation to asbestos.
- The following matrix identifies the training that will be undertaken by all West North West homes Leeds personnel with the responsibilities allocated.

Personnel	Induction	Duty Holder Training	P405/P406	P402	Asbestos Awareness	Asbestos information booklet
All Staff	√					√
All new staff	√					√
All staff with customer contact	√				√	√
Maintenance Surveyors	√				√	√
(Senior Maintenance Surveyor	√			√	√	√
Asbestos Manager	√		√	√	√	√
Head of Service	√	√				√
Duty Holders	√	√				√

3.0 Specific Needs

- 3.1 We will seek to arrange an appointment at a convenient time with the customer. If the customer requests a male or female surveyor, we will seek to meet these needs. We will also use customer profiling data to identify any customer needs, such as language or disability.
- 3.2 We will inform customers in writing before any asbestos works begin, and will include options for the provision of different community languages. If a customer requires a different language, then we will use our Translation and Interpretation procedures to meet their needs.
- 3.3 When a customer has vulnerability needs we will work with both our Safer Estates Team and external agencies to ensure that the customer's needs are being considered. If we identify a disability, such as visual impairment, then we will work with both our contractors and customer to set up passwords as appropriate and with the customer's consent.
- 3.4 Where possible, we will seek to respect the religious/faith needs of our customers.

4.0 Consultation

- 4.1 Consultation on the WNWHL Asbestos Management Policy has taken place with customers through the Asset Management Sounding Board, contractors, and other key stakeholders. There were no adverse comments received.

5.0 Implementation

- 5.1 Directors of West North West Homes Leeds Board, the Chief Executive and Head of Services for Property Investment are responsible for ensuring that this policy is implemented.
- 5.2 It is the responsibility of all West North West homes Leeds' employees to ensure that their work is carried out in line with this policy and procedures relating to it.
- 5.3 We will introduce all the necessary information and procedures into all our training packages with staff. Asbestos Awareness training will be mandatory for all new starters.

6.0 Monitoring

- 6.1 West North West homes Leeds will monitor and manage the contractor performance and customer and tenant satisfaction levels to ensure all client groups are being considered to assist West North West homes Leeds in the development of healthy neighbourhoods and communities
- 6.2 We will measure our performance of the asbestos management service through Best value, and national and local performance indicators against our service standards
- 6.3 We will provide clear and accurate information on the overall service and unit costs and review cost effectiveness so that both value for money and business efficiencies can be achieved.

7.0 Expectations

- 7.1 We will ensure that staff and contractors carry identification at all times.
- 7.2 We, and our external contractors, will treat our customers with respect and dignity.
- 7.3 We will not tolerate abusive language from our customers. We will challenge negative behaviours or attitudes, such as racism, sexism, and homophobia, etc., when working with our customers and contractors.
- 7.4 As part of our procedures we will contact the customer on three separate occasions to arrange access to their home, in order to carry out asbestos works; if these attempts fail, then we will cancel the work.
- 7.5 If the customer is unhappy with our service they can use the WNWHL Complaints process.
- 7.6 We will implement Customer Satisfaction Surveys in order to monitor our performance, and will regularly review our findings in order to ensure that our service meets our customers' needs.

8.0 Review

In preparation for delivering this policy during 2009 West North West homes Leeds has reviewed and taken into account new or emerging government legislation and government and council policies.

As a result, this policy now fully reflects, and is inclusive of the issues arising from those policies and legislation, and considers the impacts arising.

- 8.1 This policy will be reviewed and updated by West North West homes Leeds Asbestos Manager on an annual basis or if there are major changes in asbestos legislation, HSE approved codes of practice or guidance. The revised version of MDHS100 is expected in the Autumn of 2009 which will therefore necessitate policy review and revision upon the document's publication and further approval will be sought at this time.
- 8.2 We will review and monitor both the performance customer satisfaction against policy and procedures. We will also review this policy in conjunction with our customers periodically to keep up to date with legislation and policy

9.0 Legislation

- 9.1 West North West homes Leeds aims to develop strong partnership working with its contractors delivering the service and will therefore work alongside and link strategies and policies which include, but not be limited to, the following

Asset Management Strategy
Duty of Repair - Section 11 of the Landlord and Tenant Act 1985.
Responsive Repairs Policy
Tenant Support Policy
Vulnerability Policy and Strategy
Customer Care Strategy
Complaints/Compliments Policy
Value for Money Strategy
Procurement Strategy
Cohesion and Diversity Strategy
Financial Strategy
Access to Services Strategy
Customer Involvement Strategy
Adaptations Policy
Gas Servicing Policy
Asbestos (Licensing) Regulations 1982
Control of Asbestos Regulations 2006 (CAR 2006)

