



Asbestos Management Plan

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Introduction

This Management Plan, along with the SCH Asbestos Management Policy, describes how SCH manages the risks posed from Asbestos Containing Materials (ACM) or those materials presumed to contain asbestos within both non-domestic and the 'common parts' of multi-occupancy domestic premises, such as purpose-built flats or houses that are converted into flats SCH manage on behalf of Solihull Metropolitan Borough Council (SMBC). The common areas include foyers, corridors, lifts and lift-shafts, staircases, roof spaces, gardens, yards, outhouses and garages - but would not include the individual flats themselves.

As a responsible social housing landlord managing properties on behalf of SMBC, SCH will ensure that:

- Any work undertaken inside tenanted or void properties that may involve ACM's or material assumed to contain asbestos is assessed, managed and all necessary precautions are taken to prevent exposure to ACM's to anyone affected by the work.
- It complies with the Construction, Design and Management Regulations (CDM 2015) when commissioning or undertaking repair or construction work.
- Where it is aware asbestos is present, it will notify those responsible for commissioning or undertaking repair or construction work (including response repair teams) of its presence.

Preventing Exposure

Asbestos is very common in older homes and buildings; however the use of asbestos was banned in 1999. Where asbestos is present, it does not pose a risk to health providing the asbestos containing material is in good condition and is not disturbed.

In order to prevent unnecessary exposure to airborne Asbestos fibres SCH has produced this plan to protect persons both occupying premises for the normal operation of their day to day activities, and those engaged in works of maintenance, repair and refurbishment.

In the event of an uncontrolled release of fibres and where an employee is exposed or deemed to have been exposed to Asbestos fibres above the control limit as detailed in Regulation 11 CAR 2012, it is essential that they are informed immediately and that a note is made on their medical or personnel file.

Where any person has been placed at risk due to "unplanned" exposure to Asbestos fibres then the incident may be reportable to the Health and Safety Executive as required under Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013. For further advice and guidance, contact the SMBC Health, Safety and Risk Service.

Any information relating to exposure will be kept by SCH's Human Resources Department and Insurance Team for a minimum of 40 years or until the person is above the age of 80, due to the latency period of potential diseases.

Asbestos Management Strategy

SCH will conduct surveys on all common areas and offices (non-domestic properties), void properties (where a management survey is not currently held, or the existing survey quality

is deemed to no longer be suitable and sufficient) and on properties where work is planned (domestic properties). We believe this is the most effective method of reducing risks to our employees, contractors, customers and others.

SCH's strategy is that all materials within buildings must be presumed to contain asbestos and treated accordingly unless, or until adequate information is received to the contrary. The purpose of the asbestos strategy is to ensure SCH have a clear commitment, goals and processes to minimise risks to employees, customers, contractors and others from ACM's.

Key objectives of the strategy are:

- The provision of an asbestos management plan and policy which details the organisation's whole approach to the management of asbestos
- A comprehensive programme of asbestos surveys which are designed to ensure compliance with our management responsibilities and reduce risks to those who may come into contact with ACM's.
- The provision of an asbestos database and register that can be used to effectively communicate asbestos information to all employees, contractors and others who may be affected by ACM's.
- Detailed employee responsibilities to ensure the successful delivery of the strategy.
- An effective training programme for all relevant employees, commensurate with their responsibilities.
- The provision of information to customers.
- A programme of condition monitoring across all relevant properties.
- The provision of emergency procedures.
- Regular monitoring and review to ensure the effectiveness of the asbestos management policy and plan.

Identification of ACM's (see Appendix 1)

All non-domestic premises will be surveyed on an individual basis to identify the presence and condition of asbestos.

The asbestos surveys will record details of the condition of the materials identified as containing asbestos and make recommendations for the most appropriate control measures. In addition, all surveys undertaken will identify within, the risk posed by ACM's in normal occupation by undertaking a material assessment.

Where SCH is conducting works within either a non-domestic or a domestic property a suitable and sufficient survey/sampling will be completed prior to commencing any works. The survey/sampling requirement will be dictated by the scope of works.

Where there is no asbestos survey, and the works are of an urgent or emergency nature all materials that are not recognised within the buildings and fittings are to be presumed to contain asbestos and treated as such.

Evaluating the Risk

Having identified the location, type and condition of the asbestos, it is then necessary to evaluate who might be exposed to the hazard and under what circumstances. This will differ in terms of whether the hazards exist under normal conditions, or whether the asbestos is being worked on.

The form of risk assessment to be required will be the following:

Normal Occupancy - An algorithm assessment (material & priority) based upon is incorporated within the management system (in accordance with [HSG 227](#)).

Work on Identified ACM's - Where it is identified that work on ACM's will be required then contact must be made with the Asbestos Team to ensure that the appropriate assessment can be made, and the required action undertaken.

Control Measures - Having identified the presence of asbestos and made an assessment of the associated risks, using either assessment, it must then be decided how best to control and manage the risk. The options are those listed below:

1. Monitor
2. Enclose
3. Encapsulate
4. Repair
5. Remove

Asbestos Register

Where SCH has undertaken or commissioned asbestos surveys or samplings, all such information will be entered into the electronic asbestos register and also stored electronically within Swordfish.

The information held within the database and/or Swordfish will then be made available for consultation by contractors, employees and staff who may be affected by the presence of asbestos in carrying out their respective duties.

The Asbestos Register will be updated based on investigation, sampling and remedial works carried out and information gained during inspections or supplied by contractors or occupants.

A regular internal review will be undertaken to check that the Register has been kept up to date. This will be organised by the Asbestos Plan Manager.

The Asbestos Contract Officer will provide regular evidence detailing the continuous maintenance of the database, or at any time that the Asbestos Plan Manager requests it, with the Asbestos Plan Manager to conduct a to confirm the evidence provided is accurate by an independent external technical expert.

Any issues will be escalated via the Building and Resident Safety Group.

Duty to Manage (see Appendix 2)

In accordance with Regulation 4 of the Control of Asbestos Regulations 2012 there is a

requirement for all known asbestos containing materials in non-domestic premises to be inspected periodically.

Where there is asbestos present these areas will be re-inspected periodically based on the risk assessment, taking account of the material found, and the likelihood of disturbance. Re-inspections will be undertaken by appropriately trained SCH personnel or by an appropriately trained and experienced Surveyor.

Following a re-inspection visit, any deterioration in condition or circumstances affecting the ACM will be recorded and an appropriate control measure given. Any remedial works required will be assessed using the below hierarchy and managed by the Asbestos Co-Ordinator.

1. Monitor
2. Enclose
3. Encapsulate
4. Repair
5. Remove

Domestic properties will not normally be re-inspected, unless a risk assessment determines that additional controls are necessary.

Training

Training will be provided for employees for undertaking their individual and organisation duties. Training will be designed to provide each employee with suitable and sufficient information proportionate to the risks of exposure and their roles. Typical levels of training requirements are outlined in the table below.

Asbestos Awareness training, in accordance with the requirements of Regulation 10 – Information, instruction and training (CAR 2012), will be provided to all employees who could conceivably expose themselves to asbestos during their normal everyday activities.

Training Table:

Training	Who
Foundation Asbestos Awareness Information Fact Sheet; via toolbox talk, core brief or e-learning system and corporate induction	<ul style="list-style-type: none"> • All staff and new starters
Asbestos Awareness	<ul style="list-style-type: none"> • Duty Holder (Chief Executive) • Executive Directors • Heads of Service • Building Safety Managers • Maintenance employees • Building Managers / Facilities Managers • Site Managers • Contract Managers/Project Managers • Staff involved in roles relating to refurbishment and maintenance of buildings • Estates and Neighbourhoods Teams • Staff conducting Customer home visits
Operational Asbestos Training	<ul style="list-style-type: none"> • Maintenance employees • Building Safety Managers

(Management Plan; Maintenance, Management and Communication.)	<ul style="list-style-type: none"> • Building Managers / Facilities Managers • Site Managers • Contract Managers/Project Managers • Staff involved in roles relating to refurbishment and maintenance of buildings
Specialist Asbestos Related Training (P405)	<ul style="list-style-type: none"> • Head of Building Safety • Building Safety Manager • Asbestos Contract Officer • Deputy Asbestos Officer (Compliance Risk Assessor)

Refresher training will be delivered as necessary, and a course based on training needs analysis will be delivered every 3 years.

It is a requirement that any contractor carrying out work on behalf of SCH will be trained to a minimum of 'Category A' level Asbestos Awareness where their role has the potential to encounter ACMs.

For staff specifically employed to undertake limited work with asbestos where a license is not required, tailor-made training will be provided by an approved provider. This will include details of the methods for working with asbestos and controlling the release of asbestos fibres to the environment. Refresher training will be carried out annually and is mandatory.

Repairs and Maintenance Works (including voids) (see Appendix 3)

Where repairs or maintenance works are required, those persons conducting the works (SCH employees and / or Contractors), who will have as a minimum Asbestos Awareness Training, and must check for the presence of asbestos prior to commencing works.

A dynamic Risk Assessment must be conducted prior to starting works taking into account the scope of works required and areas of the building fabric that may be disturbed, and the employee and / or Contractor must ensure all risks are adequately controlled and that no ACM will be disturbed as part of their scope of work.

Should ACM need to be disturbed as part of the work the employee and / or Contractor will not commence works and will inform their Line Manager.

The Asbestos Team will be contacted by either the employee, Line Manager or Contractor to determine the necessary control measure required, and they will make the arrangements for a suitably qualified and competent person to complete the remedial action on the ACM to facilitate the repair and maintenance works.

If suspect materials are discovered during the course of the repair and maintenance works, the employee / supervising manager will halt work and take any necessary or recommended action as described under "Emergencies / Unplanned Disturbance" section.

All relevant documentation will be provided to the Asbestos Contract Officer on completion of works so that the asbestos register can be updated.

Capital Investment/Refurbishment/Demolition Works (see Appendix 4)

Where demolition or refurbishment is planned a Refurbishment and/or Demolition Survey (full access sampling and identification survey) must be undertaken before a project starts where the works entail exposure of parts of the structure or fabric that could not have been seen during a Management survey. This may even mean a part-destructive (Targeted) survey or sampling in the particular area of a building where works are to be undertaken.

The Project Manager / Section Leader and /or contractor will make arrangements for ACM's that will be disturbed as part of the scope of works to be removed or controlled prior to works commencing. (Asbestos Team to provide guidance if required)

If suspect materials are discovered during the course of demolition or refurbishment works the employee / supervising manager will halt work and take any necessary or recommended action as described under "Emergencies / Unplanned Disturbance" section.

All relevant documentation will be provided to the Asbestos Contract Officer on completion of works so that the asbestos register can be updated.

Working with ACM's (See Appendix 5)

SCH will only carry out asbestos works to unlicensed, or low level notifiable non-licensed categories, all other work will be sent to appropriately qualified contractors:

Non licensed works with ACM's will only be carried out following the relevant training. This work will be carried out by competent personnel, utilising appropriate tools and personal protective equipment (PPE).

Work with ACM that does require a license, must only be carried out by a suitably approved licensed contractor following all relevant and current legislation.

Disposal of asbestos waste will be in accordance with the Hazardous Waste (England and Wales) (Amendment) Regulations 2016.

ACM Removal (See Appendix 5)

Removal of asbestos is a hazardous operation and must be carried out under strictly controlled conditions.

Any works to remove a licensed ACM must be carried out by a fully asbestos licensed contractor. These works include all work with sprayed asbestos coatings and asbestos lagging and all work with asbestos insulation and asbestos insulating board (AIB).

The contractor is to adhere to the current approved control limit when working with asbestos. All required PPE and decontamination units will be provided by the contractor to his employees, and anyone found not wearing appropriate PPE will be required to leave the site.

Air testing will be carried out for all licensed removal works.

SCH will only carry out asbestos removal of non-licensed, or low level notifiable non-licensed categories using employees who have completed the relevant training and are competent to complete the works, utilising appropriate tools and personal protective equipment (PPE).

Disposal of asbestos waste will be in accordance with the Hazardous Waste (England and Wales) (Amendment) Regulations 2016.

Waste Disposal

All non-licensed asbestos waste produced by SCH operatives will be double bagged in minimum 500 gauge polythene at place of removal by trained and competent persons. Bagged waste will be transported in designated secure area of the vehicle and placed in the designated SCH Asbestos Skip.

Any waste produced by a contractor working on behalf of SCH, will be the responsibility of the Contractor and is to be transported and disposed of responsibly, and in accordance with all legislative requirements.

All disposal of asbestos waste will be in accordance with the Hazardous Waste (England and Wales) (Amendment) Regulations 2016 and the relevant documentation will be completed by SCH employees or provided by approved, competent contractors approved by SCH to conduct such works.

Emergencies / Unplanned Disturbances (see Appendix 6)

Should an operative or contractor damage an asbestos containing material (ACM), they must ensure that they and any other person's present leave the area immediately. The area must be sealed and access to it restricted immediately, closing doors/windows, sealing any gaps with duct tape, and ensuring that no other personnel enter the affected area. Safety signage must be used to label the area as restricted access. Until signage is in place, once sealed, the area must not be left unattended in order to prevent access until the Asbestos Contract Officer advises otherwise.

The contractor or member of staff must then inform their supervisor and the SCH Asbestos Contract Officer immediately so that the situation can be controlled and managed appropriately. Out of hours, the duty manager is to be informed and they will co-ordinate the control measures.

The Asbestos Contract Officer will advise as to any decontamination or further action that the individual(s) who accessed the area may be required to take, such as recording the incident on their medical records and assisting in the completion of an incident report.

Any staff or persons affected by the incident should be briefed by the Asbestos Contract Officer on any potential exposure issues and advise of any necessary follow up action i.e., ongoing health monitoring, registering the event on their medical records for reference in the event of a future claim. If the incident has caused the persons involved stress, the Asbestos Contract Officer can refer the persons to access assistance through the Employee Assistance Programme.

Contractors

All contractors will be able to demonstrate adherence and use of information made available to them through this policy through testing as part of SCH's ongoing audit regime.

There are a number of options for asbestos remediation works:

1. Approved asbestos analyst
2. Approved licensed removal contractor
3. SCH Asbestos Removal Team (non-licensed ACMs only)

For clarity the same partner cannot be used for both analytical and removal functions, even if they are separate divisions within that company, nor shall the licensed asbestos removal contractor be permitted to select or sub-contract their own analyst. This arrangement will be enacted to avoid any potential conflict of interest between the parties involved.

Contractors are responsible for managing their own asbestos management procedures, in consultation and agreement with SCH. SCH may require additional controls for specified risks, and these will be notified at the project initial meeting or as they arise.

Contractor operatives and managers need to be trained to a minimum of 'Category A' level Asbestos Awareness where their role has the potential to encounter ACMs.

SCH will provide the contractor with information held within our database regarding the known locations of ACM's, or will arrange for a suitable & sufficient asbestos survey to be carried out specific to the works to be undertaken. The Contractor must ensure the effective planning of works to ensure sufficient time to carry out the survey, or to manage known ACM's prior to works commencing. The Contractor will inform their own operatives/sub-contractors of the presence of asbestos and/or materials in the property presumed to be asbestos together with their own Safe Systems of Work (SSoW).

Where materials are suspected of containing asbestos no work should commence. The Contractor is required to inform the SCH Contract Officer/Project Manager of the asbestos who will take the appropriate action.

Where contractors, with the prior agreement of SCH, are responsible for the management arrangement of asbestos associated with their works the following applies:

- All asbestos removals that require a license shall only be undertaken by suitably qualified and competent contractors and in compliance with legislation and Approved Codes of Practice.
- Non-licensed and Notifiable Non-licensed removal works are to be carried out by suitably qualified and competent operatives in compliance with legislation and Approved Codes of Practice.
- The Contractor is responsible for all disposal of asbestos-containing waste and this is to be carried out responsibly and in accordance with legislative requirements.

The contractor is to provide SCH with relevant certification and evidence of competency prior to commencing works and is to provide SCH with copies of all legally required, and relevant documentation, such as COR's and WCN's upon completion of works.

Monitoring and Reviewing

The Asbestos Management Plan will be reviewed every 12 months by the Asbestos Plan Manager to ensure it is effectively controlling risks and to allow continuous improvement. Monitoring arrangements must include:

- The level of information provided in the asbestos register and how it is being updated.

- The condition of ACM's left in-situ and the adequacy and frequency of re-inspections.
- The provision of information to those who need it, including monitoring access to the database.
- The effectiveness of the procedures for the removal of asbestos.
- Communication with and training of employees, trades staff and contractors.
- Effectiveness of training and awareness for all relevant staff.
- Recording of incidents and accidents and investigating outcomes.
- Use of PPE and equipment used to reduce exposure to asbestos.
- The effectiveness of communicating information to customers.

The review will be presented to the Building and Resident Safety Group for approval, and recorded as such with the meeting minutes and within this document's version control.

External assessment conducted by a suitably technical expert will be commissioned by the Asbestos Plan Manager to independently review adherence to this Asbestos Management Plan.

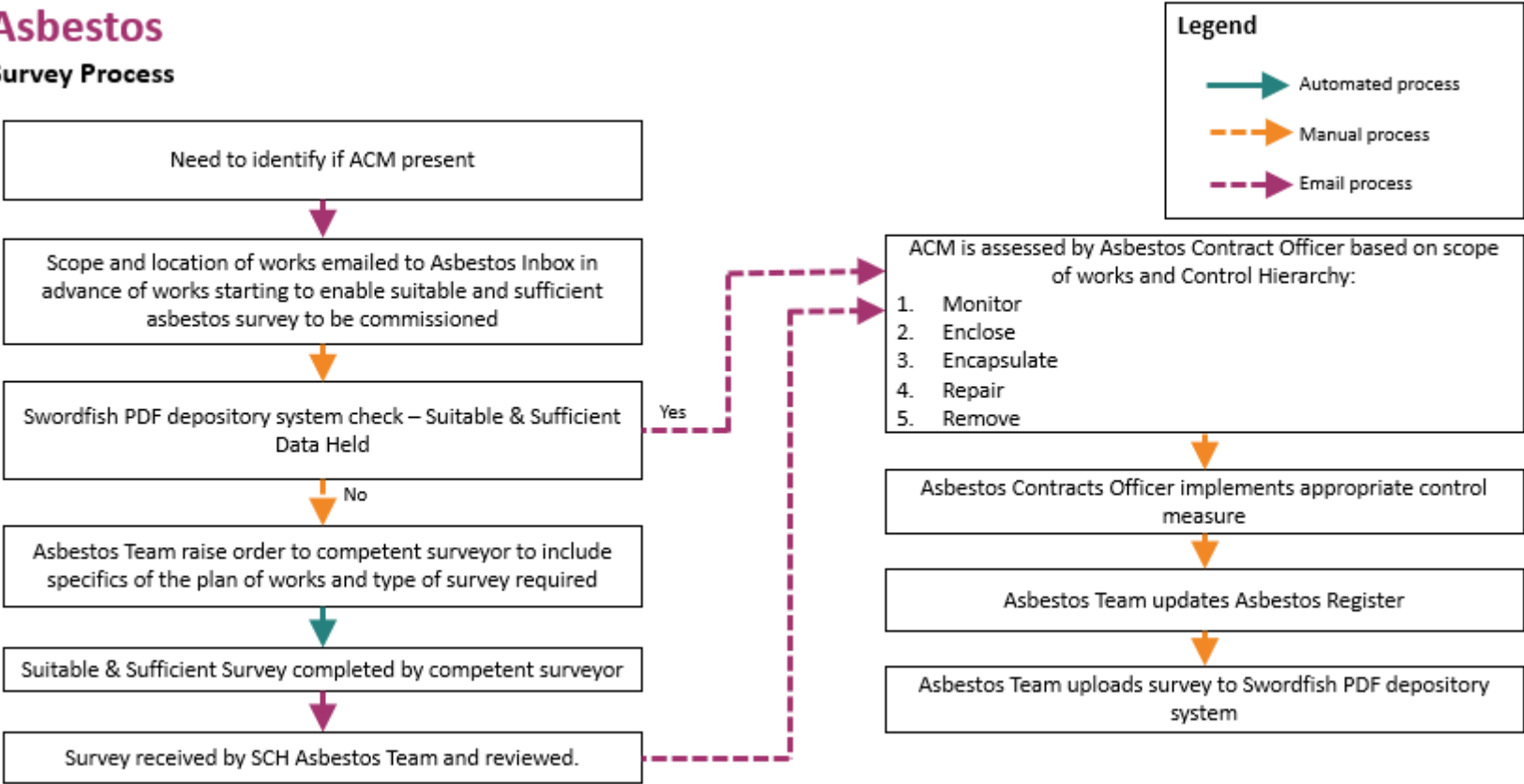
Any actions arising will follow the escalation process as detailed in the Asbestos Management Policy

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Appendix 1

Survey Process Map

Asbestos Survey Process

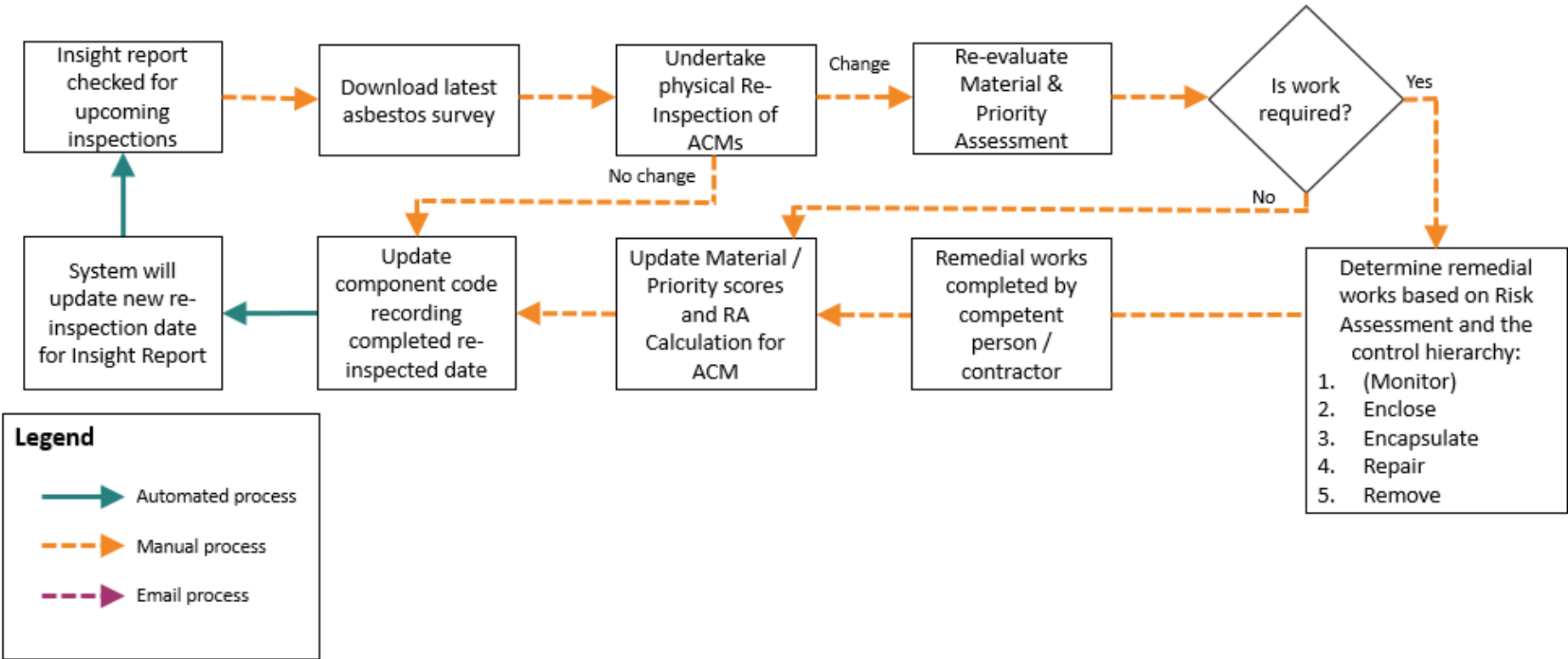


Appendix 2

Common Areas Re-Inspection Process Map

Asbestos

Common area inspections – To be completed by Safer Homes Team or suitable contractor.

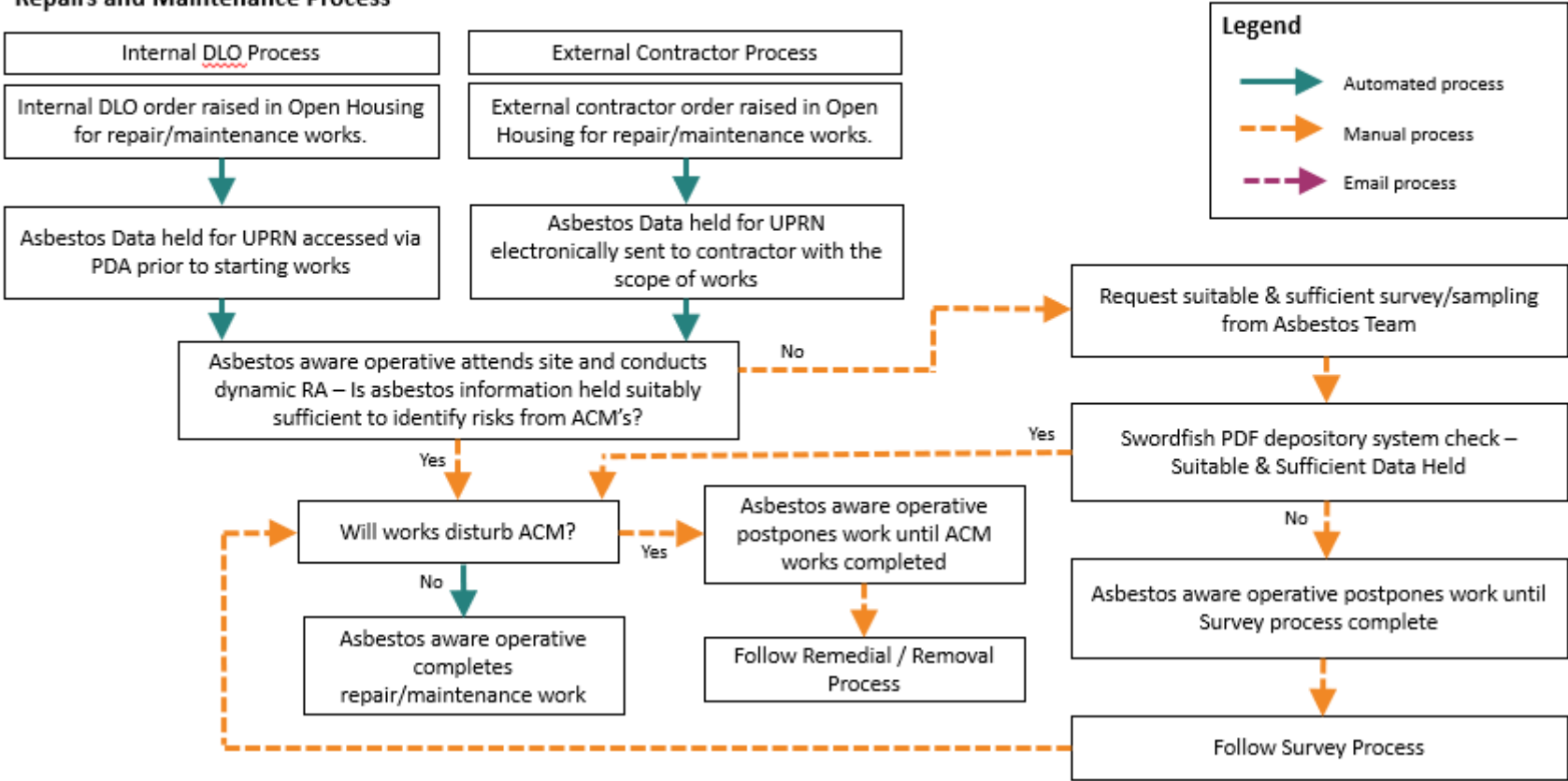


Appendix 3

Repairs and Maintenance Process Map

Asbestos

Repairs and Maintenance Process

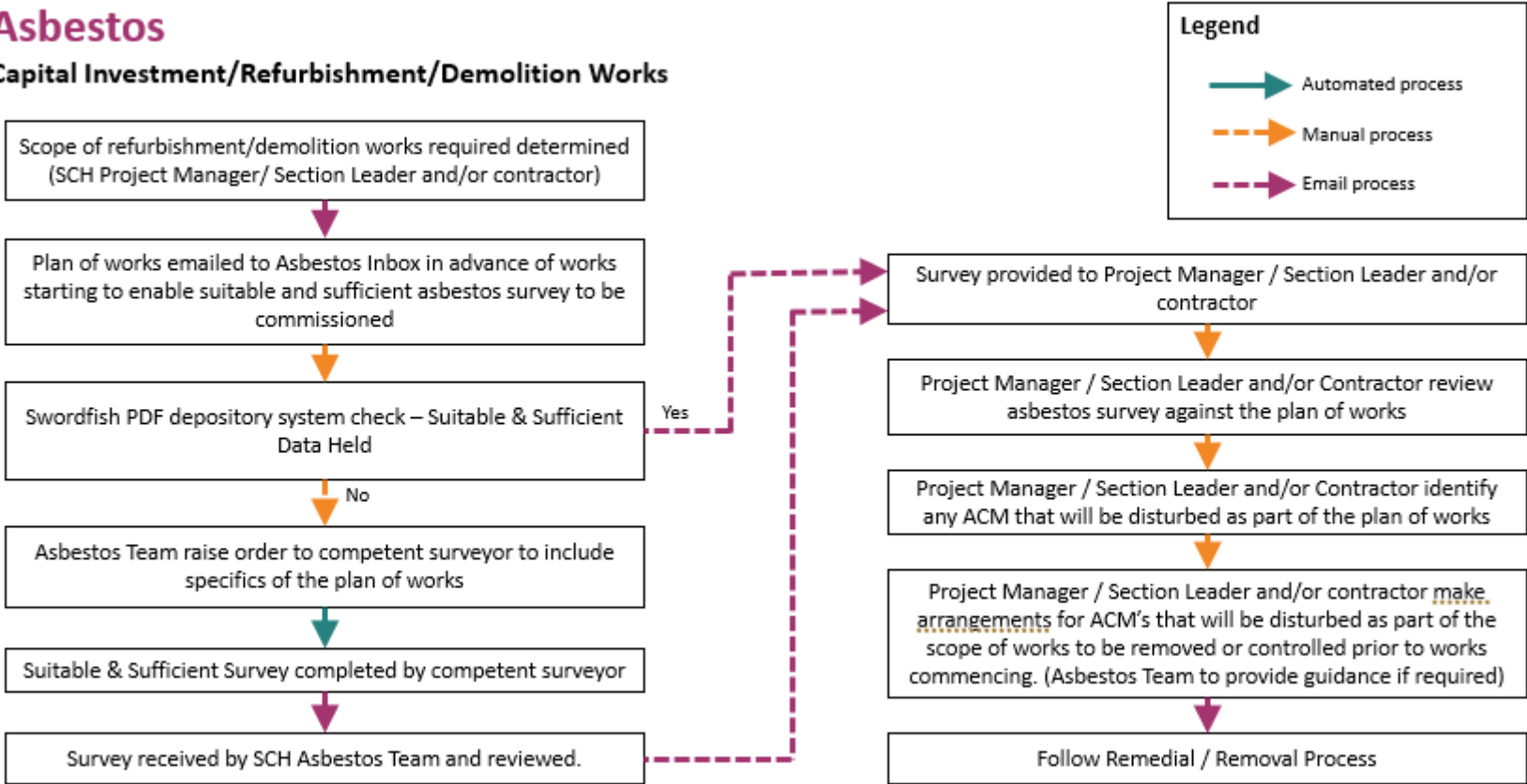


Appendix 4

Capital Investment / Refurbishment / Demolition Process Map

Asbestos

Capital Investment/Refurbishment/Demolition Works

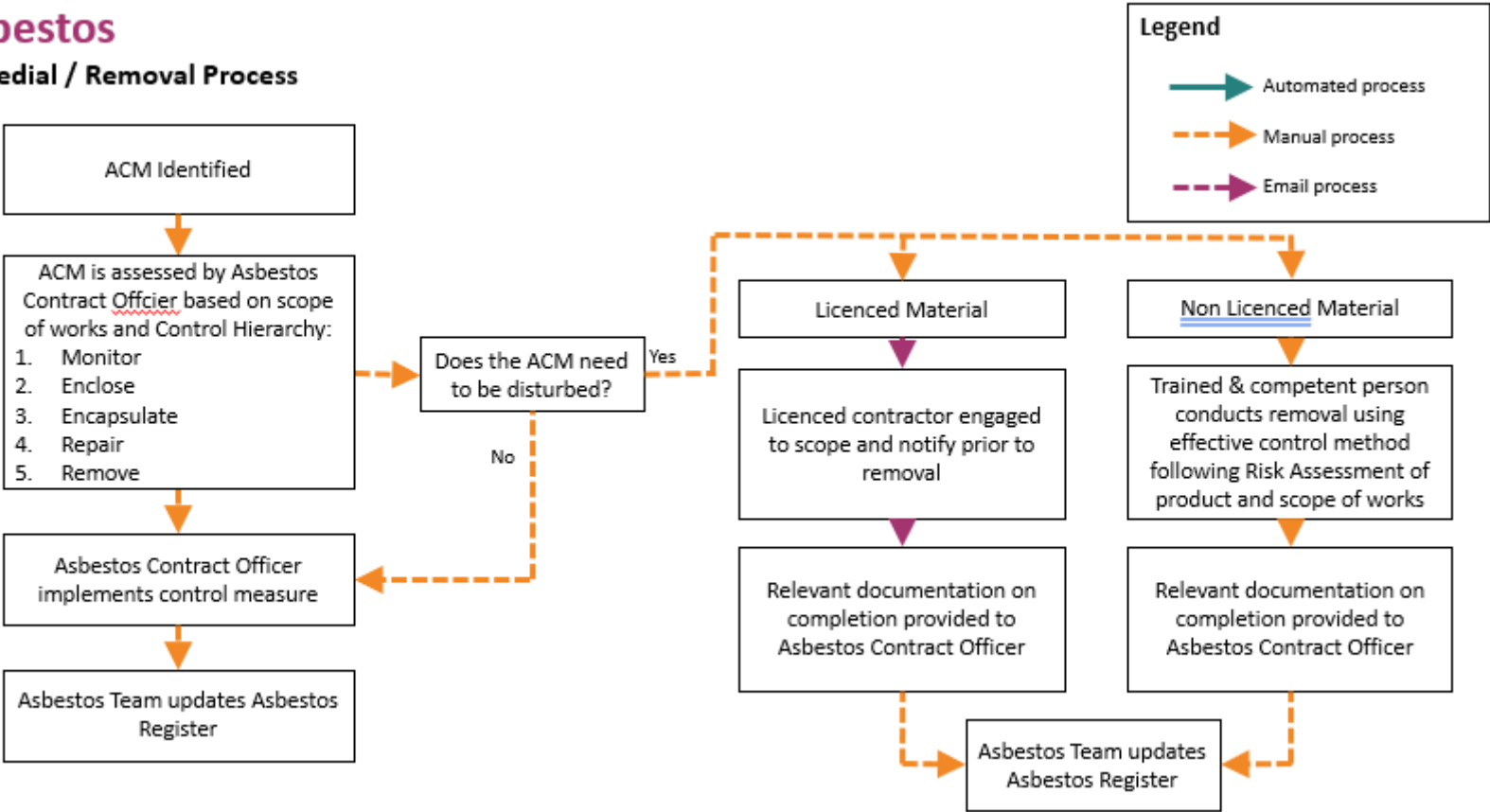


Appendix 5

Remedial / Removal Process Map

Asbestos

Remedial / Removal Process



Appendix 6

Emergency Procedure Process Map

Asbestos

Emergency Procedure – Disturbance by DLO/Contractor

