



DACORUM BOROUGH COUNCIL

HOUSING

ASBESTOS POLICY & MANAGEMENT PLAN

Asbestos Policy & Management Plan

Contents	Page
Review and Amendments	3
1: Asbestos Policy	4-13
1.1: Policy Statement	4
1.2: Policy Aims and Key Objectives	4
1.3: Introduction	4
1.4: Scope of Asbestos Policy	4
1.5: Duty to Manage	5
1.6: Duty Holders	5
1.7: Roles & Responsibilities	6
1.8: Asbestos Management Group (AMG)	9
1.9: Asbestos Surveying	9
1.10: Asbestos database and Risk Assessment	9
1.11: Asbestos Training/Awareness	10
1.12: Information sharing	10
1.13: Home Improvement Applications	11
1.14: Asbestos Incident	11
1.15: Asbestos removal contractors	11
1.16: Labelling of Asbestos Containing Materials (ACMs)	11
1.17: Monitoring	12
1.18: Reviewing the AMP	12
1.19: Reference Legislation, Approved Codes of Practice (ACOPs) and Guidance Documentation	12
2: Asbestos Management Plan	14-23
2.1: Introduction	14
2.2: Gap analysis	14
2.3: Asbestos identification (surveying)	15
2.4: Managing identified ACMs	16
2.5: Managing the condition of identified ACMs	17
2.6: Periodic review	18
2.7: Maintenance, refurbishment and demolition procedures	18
2.8: Asbestos discovery, disturbance and emergency procedures	20
2.9: Informing relevant person(s) of the presence of ACM's	22
2.10: Communicating and sharing the Asbestos Management Plan	22
2.11: Training	22
2.12: Monitoring/Auditing	22
Appendices	24-25
General Guidance to Occupants of Council Properties	

Review and Amendments

Review Date	Revision Number	Page Number	Comments / Amendments	Initials
	01		Initial issue by Life Environmental to DBC	AR

Reviewed and approved by:			
Name	Mark Gaynor	Elliott Brooks	Fiona Williamson
Position	Corporate Director (Housing & Regeneration)	Assistant Director Housing	Group Manager (Property & Place)
Signature			
Date			
Name			
Position			
Signature			
Date			

The AMP is reviewed and revised and signed off as suitable for current activities by; Corporate Director (Housing & Regeneration), Group Manager (Property & Place) & Risk, Compliance & Health & Safety Officer.

The AMP including records

Asbestos Policy

1.1: Policy Statement

This policy is designed to provide a clear acknowledgement of the responsibilities that Dacorum Borough Council (DBC) has in relation to the management of asbestos and its approach to the management of asbestos within the properties it has responsibility for.

1.2: Policy Aims and Key Objectives

The aims and objectives of this policy are summarised as follows:

- Provides clear lines of responsibility within DBC for the management of asbestos
- Specifies responsibilities in the management of asbestos
- Provides a commitment to communication regarding asbestos
- Clarifies the DBC Asbestos Management Strategy
- Establishes the Asbestos Management Group (AMG) which will review and monitor all areas of compliance and
- Prevent or reduce to the lowest level reasonably practicable risks to the health and safety of DBC's tenants, employees, contractors and the public using its buildings

1.3: Introduction

The purpose of this document is to set out The Council's policy for identifying and managing asbestos within its premises, to ensure that systems are in place when work is to be carried out, to ensure that systems are in place in the event of an emergency (uncontrolled release of asbestos fibres) and to demonstrate compliance with its legal obligations. This includes disseminating appropriate information to anyone who may disturb an asbestos containing material within a Council property, either deliberately or accidentally.

The objectives set out within this Policy are further expanded upon within the Asbestos Management Plan to provide a practical interpretation as to how the Council will undertake the management of asbestos within the properties it manages.

It is a requirement that the Council, its employees, contractors and residents take all reasonable steps to comply with the management systems defined in this Policy as well as the Asbestos Management Plan and related procedures.

1.4: Scope of Asbestos Policy

This policy applies to all properties within the Council's Housing portfolio.

The portfolio includes the following property types:

- Houses
- Flats and flat blocks
- Maisonettes
- Bungalows
- Bedsits
- Elderly person (sheltered) housing units
- Community rooms
- Communal areas
- Garages

DBC acknowledges and accepts its responsibilities under the Health and Safety at Work Etc. Act 1974, and the Control of Asbestos Regulations (CAR) 2012 to identify and to safely manage Asbestos Containing Materials (ACMs) on its premises. Approved Codes of Practice and guidance information published by the Health and Safety Commission and Executive shall be taken as the adopted standard. Primary guidance relevant is listed under section 1.19 of this Policy.

1.5: Duty to Manage

The duty to manage asbestos in Regulations 4 of the Control of Asbestos Regulations 2012 usually rests with the person(s) in control of alterations, maintenance and repairs to non-domestic premises, whether that is the occupier(s) or landlord, sub-lessor or managing agent. If no such obligation exists; e.g. where there is no tenancy agreement or contract, or where the premises is unoccupied, then the regulations place the duty on the person(s) in control of the premises, which is usually the owner/leaseholder. Throughout the Regulations, this person(s) is referred to as the “duty holder”.

1.6: Duty Holders

It is the duty of Council staff as well as its contractors to ensure this policy is fully implemented. The Council officers listed below have regular and direct control/responsibilities over the management of asbestos matters in respect of Housing properties within Dacorum Borough Council:

Chief Executive

Sally Marshall

(Ext 2213) Sally.Marshall@dacorum.gov.uk

Corporate Director (Housing & Regeneration)

Mark Gaynor

(Ext 2575) Mark.Gaynor@dacorum.gov.uk

Assistant Director (Housing)

Elliott Brooks

(Ext 2615) Elliott.Brooks@dacorum.gov.uk

Group Manager (Tenants and Leaseholders)

Layna Warden

(Ext 2156) Layna.Warden@dacorum.gov.uk

Group Manager (Property & Place)

Fiona Williamson

(Ext 2855) Fiona.Williamson@dacorum.gov.uk

1.7: Roles & Responsibilities

For effective management of ACMs within DBC's Housing portfolio and overall adherence to this policy & relevant legislative requirements, the following person(s)/teams will be responsible for overseeing the following roles & responsibilities.

Chief Executive:

Ultimately responsible for ensuring the implementation of the Policy at all levels within the organisation and the provision of adequate resources to meet the requirements of that policy.

Duty Holder(s):

Are responsible for:

- The implementation of the Policy within their Service
- Chair Asbestos Management Group meetings
- Monitoring the adherence of the Policy and is required to report any non-compliance

DBC Housing Management Team:

Are responsible for:

- The implementation and adherence to the Policy within their team
- Ensuring that there is a system in place to make all employees & subcontractors aware of the contents of the asbestos management plan & relevant information for the buildings they work in, where it is possible or likely that they will come into contact with ACMs
- Ensuring that all housing properties have a management asbestos survey report, which is reviewed in accordance with the level of risk
- Ensuring that all recommended actions from asbestos survey reports are reviewed and actioned to sufficiently manage asbestos risk
- Engaging competent asbestos surveyor(s) to undertake asbestos surveys within the properties that they are responsible for and manage & monitor the asbestos survey program
- Manage and monitor the annual risk-based re-inspection of identified ACMs by managing the annual re-inspection survey program

- Project management of the asbestos removal process, including liaison with Tenants, Licensed Asbestos Removal Contractors (LARC) & subcontractors inc. reviewing documentation and carrying out quality assurance work
- To manage information relating to the completion of asbestos removal works (documentation such as LARC Plan of Work (POW), waste consignment notes, notification documents & analytical certification) and update the asbestos register accordingly
- Responsible for the development, maintenance, quality and effectiveness of the asbestos management programme to ensure it meets all legislative requirements and industry standards
- To provide technical advice and support regarding asbestos identification, hazard evaluation and associated control measures related to asbestos for planned and responsive works
- Dealing with asbestos incidents in conjunction with appointed specialist asbestos contractors and consultants
- Monitoring the asbestos training programmes of both Council staff and subcontractors and provide ongoing asbestos refresher training to relevant council employees
- Implementation of asbestos emergency procedures as specified within the Asbestos Management Plan
- Review the effectiveness of the Asbestos Management Plan
- Auditing to ensure ongoing compliance to legislative requirements
- To provide oversight of Health & Safety issues for Housing (recognising the scale of the Council's stock) to ensure that asbestos policy and management plans are robustly followed

Partnering contractors, building & maintenance workers or contractors who work on the fabric of the building:

Are responsible for:

- Ensuring they have been provided access to the asbestos report(s) and/or supporting information for any premises being visited and making a suitable and sufficient assessment prior to commencing work
- Where no survey information is available asbestos is to be presumed to be present and the provision(s) of CAR 2012 apply
- Request DBC commission a suitable asbestos survey(s) if information is not present or if requested by DBC commission asbestos survey(s) (if survey report not available or report insufficient to allow works to proceed) by engaging competent asbestos surveyor(s) to undertake asbestos survey work and on completion provide this survey information to the DBC Housing Management Team
- Providing an appropriate risk assessment and method statement prior to commencing any works that could affect the fabric of the building
- Stopping work if they come across suspected ACMs and/or implement asbestos emergency procedures

- Adhering to maintenance, refurbishment and demolition procedures as per AMP section 2.7
- Reporting any concerns relating to asbestos management and control to the appointed person for the building and/or their council contact in the relevant DBC housing team
- Appointing LARC to conduct asbestos removal works to enable their works to proceed and/or to respond to responsive scenarios which may involve asbestos
- Retaining copies of appointed LARC documentation (such as POW, waste consignment notes & notification documents) and making this information available to the Housing management team
- Providing ongoing asbestos awareness & refresher training to relevant employees as per CAR 2012 Regulation 10

DBC Employees:

Are responsible for:

- Ensuring that any risks they become aware of relating to the fabric of council premises are suitably reported to the Appointed Person for a building(s) (if applicable) and the Risk, Compliance & Health & Safety Officer (this includes any unexpected building work)
- Stopping work if they come across suspected ACMs and/or implement DBC emergency procedures
- Reporting any concerns with the management of asbestos in DBC premises to their line manager

Appointed Person for a building(s) (e.g. SHO's):

Are responsible for:

- Ensuring they carry out any actions attributed to the Appointed Person within the plan
- Ensuring that all DBC employees are aware of the contents of the asbestos management plan & survey report for the building they work in, where it is possible or likely that they will come into contact with ACMs
- Ensuring that all building maintenance workers or other contractors who might work on the fabric of the building are aware of the asbestos survey report and/or supporting information before they commence work
- Stopping work where the building maintenance worker or contractor has not viewed the asbestos survey report and/or supporting information, where they have continued to work where known ACMs are present and/or where they have come across suspected ACMs. The DBC emergency procedures are to be implemented and the Housing Team must be contacted immediately
- Ensuring that any risks they become aware of relating to the fabric of council premises are suitably reported
- Stopping work if they come across suspected ACMs and/or implement DBC emergency procedures

- Reporting any concerns with the management of asbestos in the premises to their Head of Service

1.8: Asbestos Management Group (AMG)

This will include both operational and management staff from Corporate and Housing sections of the council. The AMG will meet on a quarterly basis (or more frequently if deemed necessary) to monitor and ensure adherence with the DBC Asbestos Policy, Asbestos Management Plan and associated detailed procedures/protocols.

As per the asbestos management strategy in the asbestos management plan, the AMG will assess the findings of gap analysis, plan & implement the required management programs as required and review progress of asbestos management programs. In addition to this, any dangerous occurrences, incidents or non-compliance to DBC asbestos policy, plan or legislative requirements under CAR 2012 will be raised and investigated by the AMG.

The Group will be chaired by the Corporate Director (Housing & Regeneration), Assistant Director (Housing) and/or the Group Manager (Property & Place). Minutes from the AMG are to be distributed to the Council's Corporate Management Team.

1.9: Asbestos Surveying

The Council undertakes to provide a 'Management' (non-invasive) survey of every property, constructed before 2000 within the Housing Portfolio.

'Refurbishment & Demolition' (invasive) surveys will be carried out to those parts of any building where refurbishment (or demolition) works are proposed.

Re-inspection surveys of identified ACMs will be carried out at regular intervals as directed by the relevant duty holder/responsible person in compliance with the Council's re-inspection program, based on a risk assessment approach. All materials identified to contain asbestos will be re-inspected annually to comply with legislative requirements under CAR 2012 Regulation 4. It is the intention therefore that changes in the condition of ACMs and thereby potential changes in risk will be identified through this re-inspection process.

1.10: Asbestos database and Risk Assessment

The asbestos database for DBC Housing properties will be stored in ProMaster in an electronic format accessible by DBC staff and contractors.

The database shall hold (but is not limited to):

- Available asbestos survey information, including all management, refurbishment & demolition and re-inspection survey reports
- Documentation relevant to the asbestos remedial program, such as LARC/removal contractor POW/RAMS, ASB5/ASB1 forms (as appropriate) & waste consignment notes on completion of repair/removal works
- Analytical documentation such as Certificate of Reoccupation & air testing certificates
- Any further relevant information such as bulk samples taken for asbestos identification above & beyond information held within survey reports

Staff and contractors must utilise the information in the asbestos database before carrying out works, in order to inform their risk assessment.

Where no asbestos database information can be made available to staff or contractors (i.e. planned or responsive repairs works) the staff or contractors will carry out a further risk assessment, to include the potential risk from ACMs, before starting any works. The result of the risk assessment will determine the next course of action.

1.11: Asbestos Training/Awareness

The minimum standard of Asbestos Awareness Training for DBC staff shall be UKATA Category A (UK Asbestos Training Association) or equivalent. Refresher training will take place on an annual basis. The Council will audit whether annual asbestos related training has been provided to relevant DBC employees & any contractors employed by the Council working upon DBC property. Further training beyond Asbestos Awareness will be required for those persons liable to work with/on ACMs – in this instance all persons must meet the requirements of CAR 2012 Regulation 10 and all applicable provisions of CAR 2012.

1.12: Information sharing

The Council maintains a procedure for informing people about the presence of asbestos. This will include but is not limited to:

- Staff
- Contractors
- Tenants (see a below)
- Leaseholders (see b below)
- 'Right to Buy' applicants (see c below)
- Home improvement applicants (see section 1.13 below)
- Members of the public (only where a need to know exists)

- a. Tenants will be given access to asbestos survey information (and other supporting information) stored on ProMaster along with the “General Guidance to Occupants of Council Properties Asbestos advice to tenants” leaflet.
- b. Leaseholders will be provided with the asbestos report for the communal parts of their building (where applicable) and these will also be updated when there is a change.
- c. Upon receipt of a Right to Buy application DBC will provide from our records asbestos survey report(s) or commission an asbestos survey (if existing information is not present) for the property. This report will be shared with the applicant(s).

1.13: Home Improvement Applications

The Council will review all new Home Improvement Applications against the asbestos register/database. Where no asbestos survey report exists one will be commissioned. If the work involves invasive works, a targeted Refurbishment & Demolition survey will be carried out. The Council will carry out all asbestos enabling works for approved improvement requests. However, reinstatement works following asbestos removal works or damaged décor is the responsibility of the tenants.

1.14: Asbestos Incident

Where it has been reported that ACMs may have been disturbed or damaged the Council’s emergency procedures will be activated. A competent person will respond immediately and be on site as soon as practicable, to assess and request a specialist asbestos contractor to attend where appropriate. Liaison will take place with any tenants, staff and contractors on site and if deemed appropriate an independent UKAS accredited consultancy will be tasked with conducting reassurance air monitoring. For further information, see section 2.8: Asbestos discovery, disturbance and emergency procedures.

1.15: Asbestos removal contractors

The Council will use licensed asbestos contractors (as required) to provide asbestos related services for the effective management of asbestos risks.

1.16: Labelling of Asbestos Containing Materials (ACMs)

ACMs will generally not be labelled in Housing properties; due to this, suitable and sufficient review of the asbestos survey prior to any works is essential, as ACMs may not be readily identifiable by labelling.

1.17: Monitoring

The Council will closely monitor works by contractors and tenants to ensure compliance.

- The Council will monitor and review risk assessments (RAs) for proposed, pre-planned works to ensure that they meet legislative standards. As per section 2.12, such RAs will be made available for review and audit, followed by work in progress inspections
- The Council may monitor the usage of the asbestos database
- The Council will undertake checks of Risk Assessments and associated Method Statements on responsive repairs, on a sample basis
- The Council will require contractors to provide evidence that asbestos awareness training and refresher training has been undertaken in compliance with CAR 2012 Regulation 10
- The Council requires contractors to provide sufficient information to DBC to demonstrate compliance with the policy and legislative compliance

Any breach of this policy and its procedures are to be reported by staff and contractors to the relevant Manager and Head of Service.

1.18: Reviewing the AMP

Once implemented, the Asbestos Management Plan will be reviewed at a minimum of every 12 months or more frequently i.e. following a change in legislation, update in good practice, following a major incident, following a significant change to the property portfolio, or if any reason comes to light to suggest that the Plan is inadequate. The review shall consider the following:

- Whether information about identified or presumed ACMs is available and reaching those who need to access this information
- Whether the assessments of these materials are still applicable
- Whether the management strategy implemented for these materials is sufficient
- Whether the Plan is achieving its goals of effective management of ACMs and prevention of exposure to asbestos fibres

If the Plan is not achieving its objectives, then it should be reviewed at an appropriate frequency until an effective Plan is in operation.

1.19: Reference Legislation, Approved Codes of Practice (ACOPs) and Guidance Documentation

The following documents have been identified as being significantly relevant to managing risks from asbestos containing materials, and further information on any document below can be obtained directly from the HSE.

Legislation:

- The Health and Safety at Work Act 1974
- Control of Asbestos Regulations 2012
- Workplace (Health, Safety and Welfare) Regulations 1992
- Hazardous Waste Regulations 2005
- Construction (Design and Management) Regulations 2015

Approved Codes of Practice (ACOP):

- ACOP L143 - Managing and working with asbestos

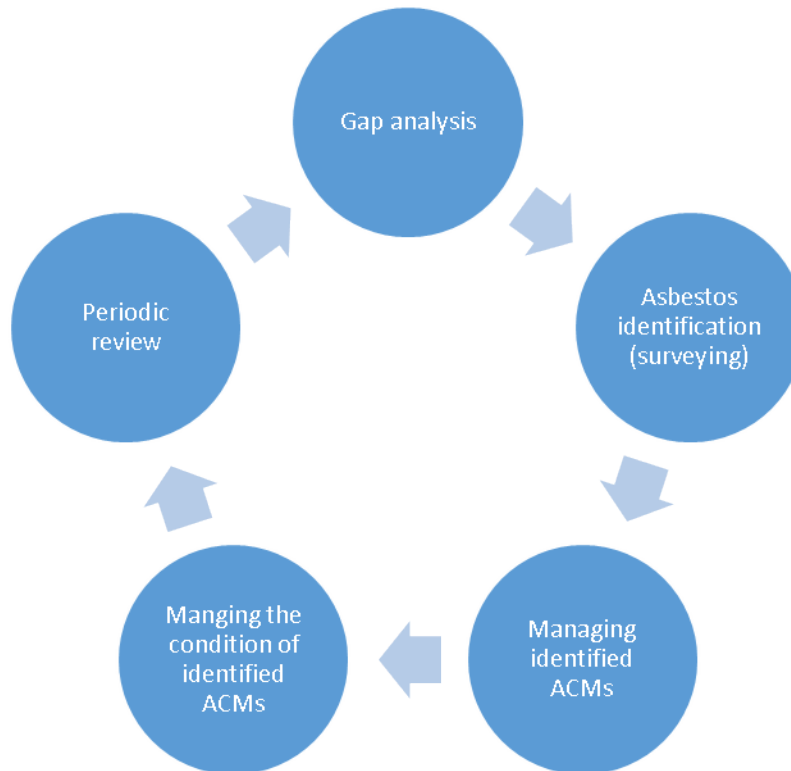
Guidance Documents (Health & Safety Executive)

- HSG 264 Asbestos: The survey guide
- HSG247 Asbestos: The licensed contractors' guide
- HSG248 Asbestos: The analysts' guide
- HSG53 Respiratory protective equipment at work

Asbestos Management Plan

2.1: Introduction

This section outlines how DBC will meet the requirements of the Asbestos Management Policy and manage its responsibilities to comply with CAR 2012 Regulation 4. DBC will enact the following strategy for management of asbestos within its portfolio as part of its Asbestos Management Plan:



2.2: Gap analysis

To suitably manage information relating to the location and condition of asbestos within the Councils Housing portfolio, enact the management plan and comply with the overall duty to manage, investigative assessment of the status of all existing information available to DBC is to be undertaken on an ongoing basis to ensure accurate records are held across the Councils portfolio.

Details of all properties which do not currently have available management asbestos survey information shall be presented to the AMG for review to implement an appropriate program of asbestos surveying. The implementation of this program and review of progress will be continually assessed by the AMG and is further expanded upon within the Asbestos identification (surveying) section 2.3.

Details of all properties which via management, refurbishment & demolition or re-inspection asbestos survey have indicated the requirement for remedial action shall be presented to the AMG for review to implement an appropriate program of asbestos remediation works. Any ACMs identified as an immediate risk due to

the condition/location of the ACM will need immediate response by the DBC Housing team; all other recommended works will be assessed and included within a suitable remediation program. A review of remediation program will be continually assessed by the AMG and is further expanded upon within the Manging identified ACMs section 2.4.

Details of all properties which do have available management asbestos survey information but do not have a re-inspection survey within 12 months from the time of initial survey or a previous re-inspection completed within the last 12 months shall be presented to the AMG for review to implement an appropriate program of asbestos re-inspection surveying. The implementation of this program and review of progress will be continually assessed by the AMG and is further expanded upon within the manging the condition of ACMs section 2.5.

2.3: Asbestos identification (surveying)

DBC undertakes to provide a management survey of every property within the Housing portfolio; if identified via gap analysis of the DBC Housing portfolio that a property does not have a management survey, this is to be actioned by commissioning a management survey via a UKAS accredited inspection body in compliance with HSG264. For the purpose of ongoing management of asbestos risk, asbestos is to be presumed present (as per CAR 2012 Regulation 5) if it is established via gap analysis that insufficient asbestos survey information is available. The AMG is to oversee this process and ensure a program of surveying is implemented so far as is reasonably practical.

If it is established via management survey that no ACMs are identified, this is to be reflected by removing the property from the ongoing re-inspection survey program; if however a refurbishment & demolition survey or any further investigative works indicate ACMs as present at any later time, any required management actions will need to be taken and this property will then need to be included within the ongoing re-inspection program.

In addition to management surveys, refurbishment & demolition surveys will be carried out to those parts of any building where refurbishment (or demolition) works are proposed in compliance with HSG264. The refurbishment and demolition survey will only be necessary in the specific area/location where the works will take place, e.g. cupboard, part of a room, kitchen/bathroom. However, further refurbishment and demolition surveys will be necessary in other locations when new improvement schemes are proposed. These localised refurbishment and demolition surveys should have the specific purpose of identifying ACMs for removal, control or avoidance during the refurbishment works. Refurbishment and demolition surveys should be incorporated into the planning phase of such work as far as possible. This will avoid delays and disruption etc. Where the work is urgent (e.g. essential or emergency maintenance, repair and installation), the refurbishment surveys may have to be carried out just before the work itself. Surveys should be performed with due diligence. Refurbishment & demolition

surveys will be actioned by commissioning a UKAS accredited inspection body in compliance with HSG264. For the purpose of ongoing management of asbestos risk, asbestos is to be presumed present (as per CAR 2012 Regulation 5) if it is established that insufficient asbestos survey information is available for the location of the proposed refurbishment and/or demolition works. The AMG is to oversee this process and ensure a program of surveying is implemented to meet legislative requirements for ongoing refurbishment and/or demolition works.

All surveying works must be performed by surveyors whom hold sufficient qualifications, experience & knowledge to fulfil the “Qualifications, Experience and Knowledge Requirements for Asbestos Surveyors” section of UKAS RG8 “Accreditation of Bodies Surveying for Asbestos in Premises”.

All commissioned asbestos surveys must be assessed by the DBC housing management team when issued to review any management actions identified by the survey. Asbestos surveyors must report any immediate asbestos risks to the DBC Housing team and take appropriate action on site to fulfil their duty of care.

To enact the overall asbestos management strategy, on receipt of asbestos survey information any identified ACMs will need to be suitably managed; see managing identified ACMs section 2.4 & Managing the condition of ACMs section 2.5 for further information.

All survey reports must be stored on the Asbestos database as per the Asbestos database and Risk Assessment section of the DBC Asbestos Management Policy.

2.4: Managing identified ACMs

As per the DBC Asbestos Management Policy, the DBC housing team will be responsible for ensuring that all recommended actions from identified ACM(s) within asbestos survey reports are reviewed and actioned to sufficiently manage asbestos risk.

If asbestos material(s) are identified in good condition, well protected either by position or physical protection, reducing the likelihood of damage, and is unlikely to be worked on regularly or otherwise disturbed, it is usually safer to leave it in place and manage the condition of the ACM(s); if ACMs or presumed ACMs that are in good condition are left in situ, the condition of the ACM(s) is to be managed & re-inspected as per the managing the condition of identified ACMs section 2.5.

If asbestos material(s) are identified in poor condition, repair or removal of asbestos may be required. Some damaged ACM(s) can be made safe by repairing and sealing (encapsulation) and/or enclosing to prevent further damage; if this can be done safely and is deemed preferable to removal, DBC shall appoint someone trained and competent to carry out licensable work,

NNLW, or non-licensable work, as appropriate to repair the ACM in accordance with CAR 2012, HSG 247 & Asbestos Essentials. On completion of any remedial work such as repairing and sealing (encapsulation) and/or enclosing to prevent further damage, the condition of the remaining ACM(s) is to be managed as per the managing the condition of identified ACMs section 2.5.

If the ACM(s) identified in poor condition is likely to be disturbed during routine maintenance work, daily use of the building and/or the survey has recommended access to be restricted due to immediate risk (asbestos debris/contamination etc.) the dutyholder should have the ACM(s) removed. DBC shall appoint someone trained and competent to carry out licensable work, NNLW, or non-licensable work, as appropriate to remove the ACM in accordance with CAR 2012, HSG 247 & Asbestos Essentials.

The AMG is to ensure a program of remedial works is implemented to meet legislative requirements for ongoing compliance; all programmed remedial works are to be prioritised based on risk as identified in the material assessment (or the priority assessment if included) and indicate their urgency, e.g. immediate, middle/longer term.

All records relating to completion of remedial works must be stored on the Asbestos database as per the Asbestos database and Risk Assessment section of the DBC Asbestos Management Policy. DBC partnering contractors (Osborne Property Services, Sun Realm, Orion, T&P, IDIS and Express Lifts) & maintenance, refurbishment and demolition contractors are to send all relevant documentation on completion of any asbestos remedial works to the DBC Housing team to ensure records can be updated accordingly.

2.5: Managing the condition of identified ACMs

As per the DBC Asbestos Management Policy, re-inspection of all identified ACMs shall be carried out at regular based on a risk assessment approach.

To enact this policy, all materials identified to contain asbestos or presumed to contain asbestos will be re-inspected annually (or more frequently if deemed necessary) by a UKAS accredited inspection body and the overall re-inspection program will be overseen by the AMG to ensure a program of re-inspection surveying is implemented to monitor the condition of all identified ACMs.

All re-inspection works must be performed by surveyors whom hold sufficient qualifications, experience & knowledge to fulfil the “Qualifications, Experience and Knowledge Requirements for Asbestos Surveyors” section of UKAS RG8 “Accreditation of Bodies Surveying for Asbestos in Premises”.

All commissioned asbestos re-inspection surveys must be assessed by the DBC Housing management team when issued to review any management actions identified by the survey as per the Managing identified ACMs section 2.4.

Asbestos surveyors must report any immediate asbestos risks to the DBC Housing team during re-inspection survey works and take appropriate action on site to fulfil their duty of care.

2.6: Periodic review

A review of all asbestos management programs such as the Survey program, Remedial works program and Re-inspection works program as well as all other measures of asbestos management performance shall be undertaken by the AMG to ensure all requirements of the Asbestos Management Policy, Asbestos Management Plan and relevant legislation are met so far as is reasonably practical.

Findings of the review are to be outlined by the AMG to ensure suitable and sufficient management of ACMs within the DBC portfolio; corrective action is to be implemented and overseen to ensure overall compliance and any non-compliance is to be reported as per the Asbestos management Policy.

2.7: Maintenance, refurbishment and demolition procedures

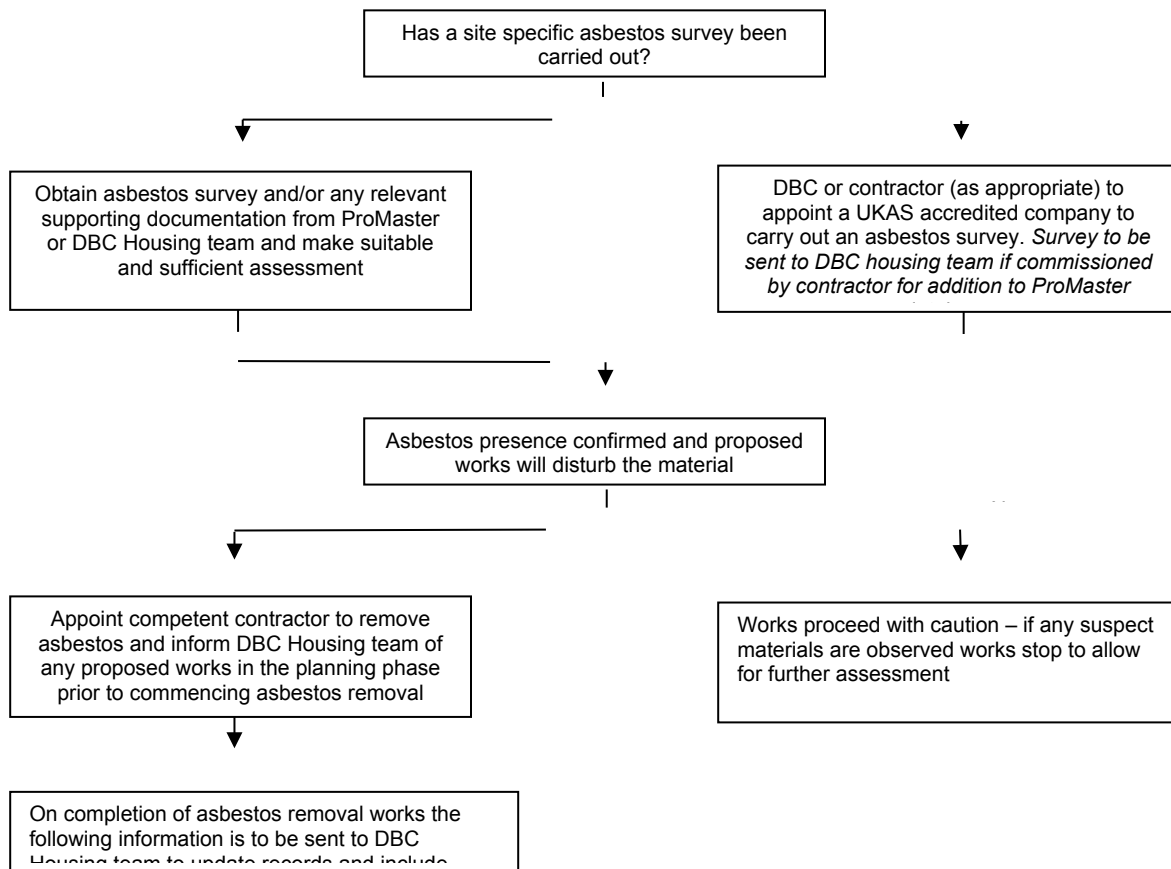
DBC Partnering Contractor Osborne Property Services are to follow Osborne “GHP-HSB-003.1 Asbestos” when planning and completing works as well as complying with the DBC Asbestos Management Policy and legislative/industry guidance.

To comply with the Policy and enable the DBC Housing management team to manage all relevant information relating to asbestos, Osborne Property Services will need to ensure that:

- On completion of any survey works commissioned by Osborne, survey information is provided to the DBC Housing Management Team
- The DBC Housing Management Team are informed of any asbestos removal works completed to allow the asbestos register to be updated accordingly and retaining copies of appointed LARC documentation (such as POW, waste consignment notes & notification documents) and making this information available to the Housing management team
- Stopping work if they come across suspected ACMs and/or implement asbestos emergency procedures
- Reporting any concerns relating to asbestos management and control to the appointed person for the building and/or their council contact in the relevant DBC Housing team

All contractors completing works on the DBC housing stock are to follow the following procedure:

Procedure prior to commencing work on DBC housing stock:

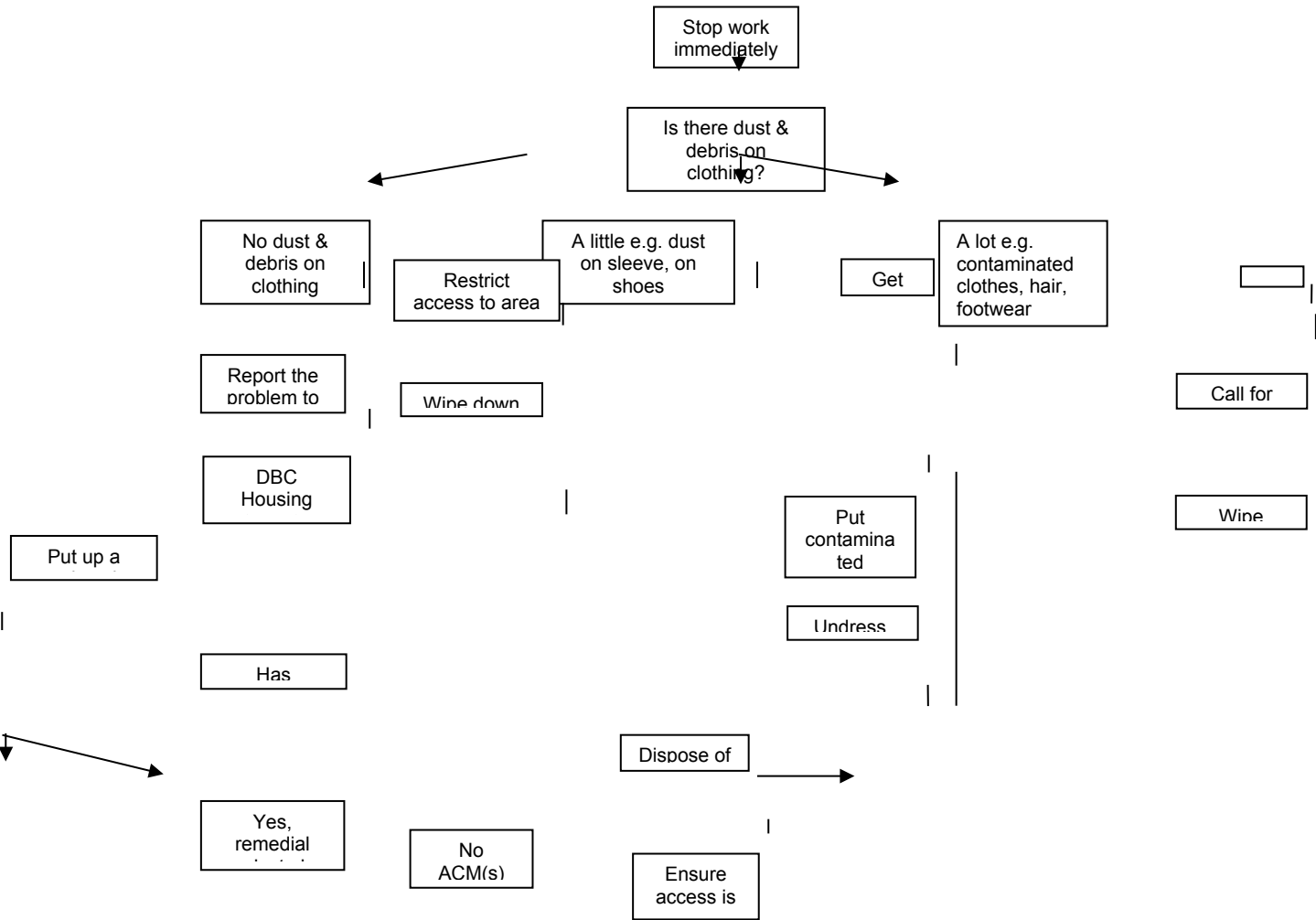


2.8: Asbestos discovery, disturbance and emergency procedures

DBC Partnering Contractor Osborne Property Services are to follow Osborne GHP-HSB-003.2 Asbestos Discovery & GHP-HSB-003.3 Asbestos Discovery and disturbed processes and procedures as well as complying with the DBC Asbestos Management Policy and legislative/industry guidance.

All other contractors are to follow the following procedure:

Procedure if materials that could contain asbestos are discovered or damaged:



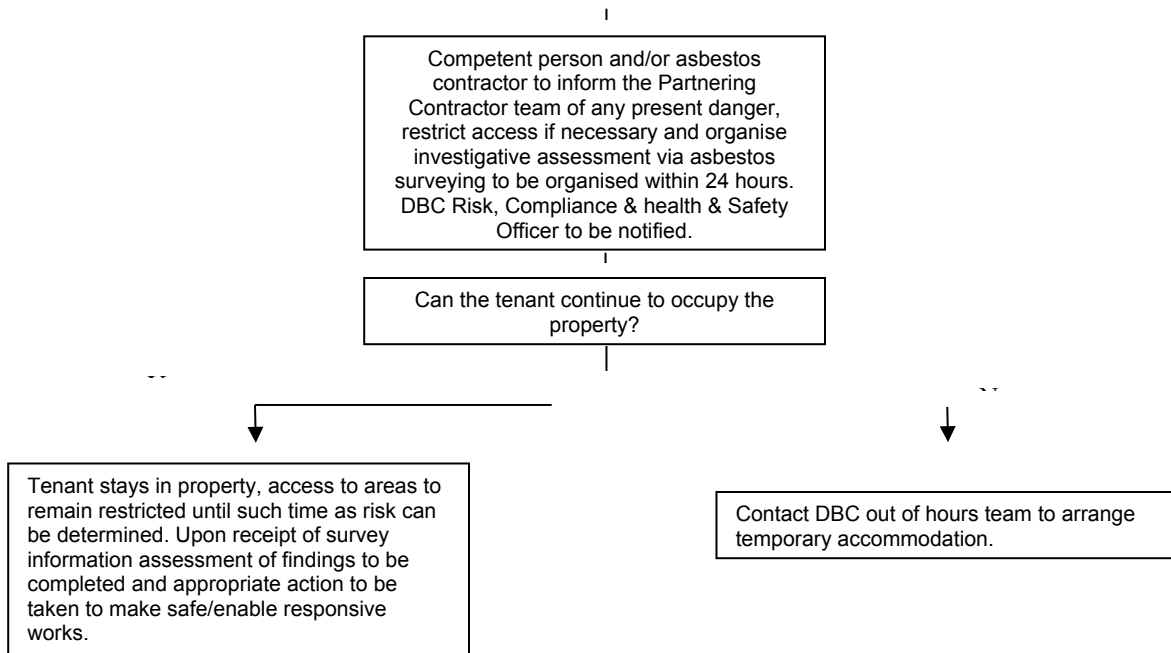
As per the “General Guidance to Occupants of Council Properties” (see Appendix) and the “Repairs Handbook” issued to tenants, emergency incidents are to be reported on 0800 018 6050 (select option 1 for Sun Realm for gas and central heating repairs and boiler servicing - select option 2 for Osborne for repairs).

Procedure for responsive works & out of hours emergencies:

Tenant contacts call centre (e.g. following collapsed ceiling due to leak or discovery of material suspected of containing asbestos). Extent & location of works to be established by Partnering Contractor.

Partnering Contractor to review available information – if the property is found to contain asbestos materials that may have been damaged or may be found in poor condition (or if insufficient information is found) a suitable competent person and/or asbestos contractor is to attend to take appropriate action on site.

If suitable and sufficient assessment of available information confirms ACM(s) are not present, responsive works can proceed with caution – if any suspect materials are observed works stop to allow for further assessment.



2.9: Informing relevant person(s) of the presence of ACM's

As per the DBC Asbestos Management Policy section Information sharing, DBC shall ensure access to ProMaster system is provided for access to the asbestos database or information to:

- Staff
- Contractors
- Tenants
- Leaseholders
- 'Right to Buy' applicants
- Home improvement applicants
- Members of the public (only where a need to know exists)

2.10: Communicating and sharing the Asbestos Management Plan

DBC shall ensure that the management plan is made available to DBC staff, partnering organisations and subcontractors. DBC shall:

- Inform employees what the management plan arrangements are;

- Provide the emergency services with information on the location and condition of any known ACMs;
- Provide copies of the management plan for employee representatives and trade union safety representatives

2.11: Training

Based upon a risk assessment approach, DBC staff identified as requiring Asbestos Awareness training shall receive Asbestos Awareness training (UKATA Category A or equivalent) which will be completed on an annual basis. Partnering contractors, contractors & associated subcontractors responsible for maintenance, refurbishment or demolition shall hold Asbestos Awareness training (UKATA Category A or equivalent) which will be completed in compliance with CAR 2012 Regulation 10.

Any persons working with/on asbestos materials must comply with CAR 2012 Regulation 10 (and all applicable provisions of CAR 2012).

2.12: Monitoring/Auditing

DBC shall audit DBC Housing management team, partnering contractors, contractors & associated subcontractors to ensure overall compliance to the Asbestos Management Policy and Asbestos Management Plan as well as legislative requirements & industry guidance. Prospective contractors' management systems, policy and competencies are to be checked during the procurement process to ensure compliance.

DBC Housing will audit the asbestos management processes of its partnering contractors once a year. The aim of this will be to assess whether the management system is working properly. Any corrective action required will be identified through H&S inspections, surveys and sampling. Team Leaders will be involved in the desk top audit of documentation, by helping to collect relevant documents from the contractor.

The Documents that should be provided as part of the audit are:

- Evidence of competency of operatives, e.g. training certificates, membership of regulatory bodies. Training must be UKATA/IATP approved.
- H&S documents, e.g. H&S Policy, Asbestos policies & procedures, Risk Assessments, Method Statements, operatives records of number of hours worked and medical records.

The Risk, Compliance and Health and Safety Officer will carry out regular ad hoc site audits to include PPE, plant and equipment e.g. DCU, housekeeping, storage of waste, correct supervision, traffic routes.

Findings shall be presented to the AMG; any instances of non-compliance shall be investigated to ensure corrective action is taken.

APPENDIX

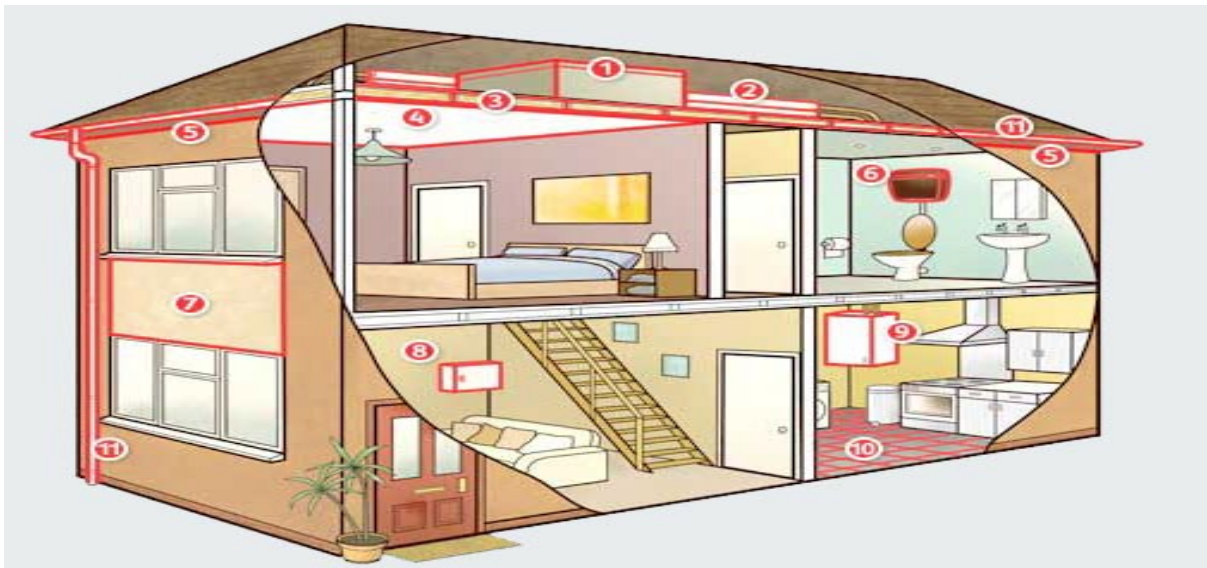
General Guidance to Occupants of Council Properties

Asbestos advice to tenants

Asbestos was widely used in building materials from the 1930's until 1999 because of its strength and fire resistance. As much of our Housing was built or refurbished during this time some properties may contain asbestos.

The Health and Safety Executive recommends that asbestos remains in place as long as it is undamaged. If left undisturbed, it poses no immediate risk to health.

If you are planning on doing any DIY, take care to avoid any areas that may contain asbestos, such as textured coatings on walls and ceilings, floor tiles and toilet cisterns. Most importantly, do not drill, saw, scrub or sand anything that you think may contain asbestos. The diagram below indicates some of the common locations although it can be found in other areas not included on this list.



- | | |
|------------------------------------|------------------------------------|
| 1. Cold Water Tanks | 7. Wall Cladding Sheets |
| 2. Lagging | 8. Wall boards/internal partitions |
| 3. Insulation | 9. Central Heating Boilers |
| 4. Artex Wall and Ceiling finishes | 10. Floor Tiles |
| 5. Soffit boards | 11. Rainwater Pipes and Guttering |
| 6. WC cisterns | |

All properties undergoing planned works, including kitchen, bathroom or heating system replacements or re-wiring will undergo an asbestos survey before work starts. Please be assured that all necessary precautions will be taken if it is found.

For more information visit www.hse.gov.uk/asbestos or contact Osborne Property Services on 0800 0186050 and press Option 2.