



## **Asbestos Management Plan (Procedure)**

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## 1. INTRODUCTION

1.1 This procedure should be read in conjunction with the Asbestos Policy.

1.2 This procedure describes our arrangements for ensuring that:

- Hanover comply with our legal duty under the Health and Safety at Work (etc) Act 1974 (HASAWA) which requires employers to ensure the health, safety, and welfare at work for all employees and “others” which could be customers, contractors, visitors, or members of the public.
- Hanover will comply with The Management of Health and Safety at Work Regulations 1999 which places a duty to risk assess, in this case this is to assess the risks associated with managing asbestos robustly, preventing exposure, for all properties built before 2000, which contain asbestos or could contain asbestos.
- Hanover will comply with all relevant regulations, in particular the Control of Asbestos Regulations 2012 (CAR) which is designed to protect the Health and Safety of workers and the general public by regulating the management and control of asbestos in various settings. Compliance with these regulations is crucial to minimise the risks associated with asbestos exposure and prevent asbestos related diseases.

1.3 It is Hanover’s legal responsibility to ensure that:

- As the owner of buildings across the estate and as an employer, the duty holder will identify the presence of asbestos in all buildings and structures.
- As the duty holder, asbestos containing materials (ACMs), must be managed across the estate. This involves creating and maintaining an asbestos register, which documents the location, condition, and risk assessment of ACMs. Adequate plans and procedures must be in place to prevent disturbance or damage to these materials.
- The risks posed by ACMs are adequately assessed and appropriate control measures are put into place.
- As an employer, suitable training must be provided to employees and others (e.g. contractors), who may be exposed to asbestos during their work.
- Any work that may disturb ACMs such as asbestos removal or repair, must be notified to the appropriate authority for example notifiable works or licensed works.
- Asbestos fibre exposure is prevented and minimised. This includes proper maintenance, labelling and safe handling of ACMs.
- Thorough records are kept to demonstrate compliance with the regulations.

1.4 It is the customer’s responsibility to provide access for any survey, inspection, maintenance, encapsulation or removal associated with the management of asbestos.

- 1.5 Asbestos surveys will only be carried out by a company that currently holds UKAS accreditation to both ISO17020 and ISO17025.
- 1.6 All reasonable steps will be taken to ensure that all asbestos related work (including encapsulation and removal will be completed by a competent person, as defined in section 5.12.
- 1.7 For factored sites where surveys or any associated works are required, the work will be ordered and completed by Hanover staff and all costs will be recharged.
- 1.8 For sites where there is a maintenance obligation (e.g. RAFA) Hanover will ensure the arrangements are understood for each site and will carry out asbestos surveys and associated works where required where it is stated for Hanover is responsible.

## **2. ROLES AND RESPONSIBILITIES**

2.1 Day-to-day responsibility for the operation and monitoring of the Asbestos Policy and this Asbestos Management Plan lies with the Repairs and Customer Safety Manager (R & CS Manager). However, all relevant employees have a responsibility to ensure that the procedures are applied as instructed.

### **2.2 Individual roles and responsibilities**

2.3 There are a number of roles and responsibilities for managing asbestos as follows:

#### **2.4 Chief Executive**

- Monitors through the Director of Asset Management the implementation and effectiveness of the Asbestos Policy and this Asbestos Management Plan.

#### **2.5 Director of Asset Management (Duty Holder)**

- Is the named duty holder and monitors the implementation and effectiveness of the Asbestos Policy and this Asbestos Management Plan on behalf of the Chief Executive,
- Ensures all risks are advised to the audit and risk committee.

The Control of Asbestos Regulations requires the duty holder to ensure that:

- Reasonable steps are taken to find materials in premises likely to contain asbestos and to check their condition.
- Materials are presumed to contain asbestos unless there is strong evidence that they do not.
- A written record of the location and condition of asbestos and/or presumed ACMs is made and that the record is kept up to date.
- The risk of anyone being exposed to these materials is assessed.

- A written plan to manage that risk is prepared and that the plan is put into effect to make sure that: –
  - Any material known or presumed to contain asbestos is kept in a good state of repair.
  - Any material that contains or is presumed to contain asbestos is, because of the risks associated with its location or condition, repaired and adequately protected or, if it is in a vulnerable position and cannot be adequately repaired or protected, it is removed;
  - All known information on the location and condition of the material is given to anyone who is liable to disturb it, or is otherwise potentially at risk.

## 2.6 **Head of Asset Management**

- Responsible for ensuring sufficient resources are in place to effectively manage asbestos and the day-to-day performance of the Asbestos management function within Hanover.

## 2.7 **Repairs and Customer Safety Manager (Asbestos Responsible Person)**

- The R&CS Manager is the internally appointed asbestos ‘responsible person. In liaison with the Head of Asset Management develops and implement policies, procedures, and safe working practices when necessary to enable us to meet our obligations under all relevant legislation and regulations. Has overall responsibility for day-to-day asbestos management in respect of the technical and physical aspects and for the preparation and maintenance of the asbestos register. They will:
  - Ensure that the action plan within the Asbestos Management Plan is implemented within the agreed timescales.
  - Ensure that processes are in place to ensure all contractors’ employees to inspect, work with or remove asbestos have the necessary skills, knowledge, and experience.
  - Ensure a process is in place to ensure asbestos surveys are undertaken within required timescales.
  - Ensure that all asbestos waste is removed, labelled, stored, and disposed of in accordance with legislative requirement, and that a cradle to grave audit trail of removed asbestos waste is available for inspection.
  - Ensure information is provided to customers of the likely location of ACMs in their homes, and respond to requests for further information on asbestos.
  - Provide expert advice in relation to Asbestos.
  - Prepare Key Performance Indicators (KPIs) relating to asbestos management for Board meetings.

- Prepare and review an Asbestos Policy, Asbestos Management Plan and relevant process maps relating to asbestos management.
- Complete or coordinate reviews of these documents at suitable intervals.

## 2.8 **Customer Safety Coordinator (Asbestos deputy responsible person)**

- Is appointed as the “deputy responsible person” in the absence of the responsible person. They are responsible for the day-to-day management of the asbestos register which includes updating records, accuracy of data, distribution and access to employees and contractors and storage of data.
- Will ensure suitable arrangements are in place for providing information to contractors relating to ACMs present within any housing stock, or other Hanover properties in which maintenance or refurbishment work is being planned.
- Will ensure suitable arrangements are in place so that asbestos surveys, removal certificates, air monitoring results and clearance certification are recorded on Keystone.
- Will co-operate as far as is necessary to support the Duty holder in meeting their legal responsibilities.
- Will ensure that all persons or contractors carrying out Asbestos surveys and remedial work are trained and competent to do so and have the correct accreditations.
- Will ensure that we audit asbestos surveys or remedial work and documentation as required.
- Will ensure monthly updates on the asbestos programmes of work are reported to the R&CSM /HoAM through the performance framework to SMT.
- Will flag any potential fails to the R&CSM as a priority and risk assesses the situation to assist the R&CSM with determining the best course of action to mitigate risk.

2.9 **Customer Safety Officer** is responsible for providing technical knowledge relating to asbestos works including providing guidance to other areas of Hanover. The Customer Safety Officer is expected to manage asbestos works when required and will carry out audits on developments relating to asbestos and asbestos management.

2.10 **Customer Safety Advisor** is responsible for ensuring compliance with our duty under the Control of Asbestos Regulations for all works requiring survey information to be provided to employees and contractors, and where this information is not in place they will advise to stop work and order the appropriate surveys to enable work to resume. They will flag any issues with the Customer Safety Coordinator immediately. They will also be responsible for raising and monitoring remedial works.

- 2.11 **Repairs Supervisor** oversees and audits the Void asbestos process carried out by the repairs advisor and actions any issues raised; supports the Customer Safety Coordinator with any issues relating to the void checks and remedial works required.
- 2.12 **Repairs Advisors** are responsible for ensuring contractors have the required information before carrying out penetrative works, instructing surveys and remedial works at the void stage or during a mutual exchange. They will ensure that the appropriate survey information is received and sent to the Customer Safety Team.
- 2.13 **Admin Assistant** provides support to the Customer Safety Advisor as required, including assisting with data and certification storage, customer communication and letter management.
- 2.14 **Contracts Officer** is responsible for carrying out asbestos reinspection surveys and updating relevant records of outcomes. They are also responsible for managing asbestos works when deemed necessary by the Customer Safety Coordinator.
- 2.14 **Housing Officer** assists with access to properties where surveys or asbestos related work needs to take place, when customers are not engaging.
- 2.15 **Manager on the Development** assists with access to properties and operates as a point of contact for anyone completing works on site, ensuring that information is made available to those who plan or initiate maintenance and related work, of the location of ACMs present within their building. They will co-operate as far as is necessary to support the Duty holder in meeting their legal responsibilities. They should familiarise themselves with locations of ACMs on their site and report any damage/deterioration to the responsible person.
- 2.16 **Contractors** will be managed in accordance with their internal risk assessments and method statements (RAMS) and construction phase plan.
- 2.17 **Other Employees** In line with the requirements of Legislation internal employees must take suitable care for themselves and any persons who may be affected by their undertakings. Employees must be made aware of the existence and requirements of this management plan and any associated protocols.

### **3. PURPOSE AND APPLICATION**

- 3.1 The purpose of this Asbestos Management Plan (AMP) is to assist with the control and management of any ACMs within the fabric of any Hanover owned or managed properties and premises. All properties constructed prior to 2000 will be subject to this AMP.
- 3.2 There exists within legislation, a requirement for organisations to manage any asbestos present within non-domestic premises – *Regulation 4 of the Control of Asbestos Regulations 2012*.

- 3.3 This legislative requirement includes common areas of developments such as corridors and stairwells serving flats as well as any office space, where the property was constructed prior to the year 2000.
- 3.4 In addition to the above we owe our customers a duty of care to be able to reside in their homes without undue risk to their health and safety, as well as statutory obligations held to internal employees and contractors who may visit these homes.
- 3.5 This means that whilst we do not have to “actively manage” asbestos within customer’s homes we still need to consider any risks it may present and action this accordingly.
- 3.6 This document aims to explain and clarify the expectations within the business in respect to the above requirements.

#### **4. LEGISLATION, REGULATIONS & GUIDANCE**

- 4.1 In terms of Asbestos responsibilities, this procedure and our Asbestos Policy comply with the wide range of legal and guidance requirements which are listed as follows:
- The Health and Safety at Work etc. Act 1974
  - The Management of Health and Safety at Work Regulations 1999
  - The Control of Asbestos Regulations 2012
  - The Workplace (Health, Safety and Welfare) Regulations 1992
  - The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR 2013)
  - The Construction (Design and Management) Regulations 2015
  - The Control of Asbestos Regulations 2012
  - The Housing Scotland Act 2006
  - Personal Protective Equipment at Work Regulations 1992
  - Environmental Protection Act 1990
  - The Waste (Scotland) Regulations 2011
  - ACOP L143; Managing and working with asbestos; Approved Code of Practice and guidance
  - HSG210: Asbestos Essentials
  - HSG247: Asbestos: The licensed contractors' guide
  - HSG248: Asbestos: The analysts guide



- INDG 223 A Short Guide to Managing Asbestos in Premises
- HSG264 Asbestos: The survey guide
- HSG227 – A Comprehensive Guide to managing Asbestos in premises

## 5. ASBESTOS MANAGEMENT PROCEDURE

5.1 Asbestos management within Hanover will be managed utilising an approach which encompasses both the requirements within the non-domestic aspects of the business (e.g. corridors, stairwells, shared areas) and consideration to the information provision within the domiciles (habitable areas – within the homes or flats).

### Asbestos within the non-domestic areas of the business

5.2 The following approach is to be implemented in areas of the business which are non-domestic, this includes:

- Shared areas of flats, such as corridors, stairwells and external areas
- Shared areas within sheltered, very sheltered and housing with care properties as summarised above
- External or circulation areas of garage sites (Lockups)
- Offices, shops & any other non-residential assets

5.3 All properties within the above criteria must have an asbestos management survey in place. Where asbestos is identified in a survey, the following procedure will be adopted. Information will be extracted from the asbestos survey and input into the asbestos register. All relevant information should be included including:

- Address information including the UPRN
- Location of the asbestos item
- Details of the asbestos item
- Asbestos analysis results
- Material risk scores (should be itemised within the survey)
- Priority risk scores (these are a responsibility of the duty holder and will require consideration by the person populating the asbestos register)
- Overall risk
- Action plan for item
- Any additional comments

- It is important that this information is adequately collated as the accuracy of this will determine the accuracy of the register.

5.4 The combination of the material & priority scores provides information regarding overall risk scoring (Maximum 24) and this can be used to determine prioritisation for action. The below offers a guide however it is essential to note that algorithms will require decisions based on other variables within properties.

<b>Total Score (MRA + PRA)</b>	<b>Action(S)</b>	<b>Timescale</b>
20-24	Remove/Restrict Access	Immediately/ ASAP
16-20	Review/Remove	Within 6 months
12-16	Review Remove	Within 1 year
2-12	Review/Inspect	Periodically

#### Asbestos within the domestic properties (domiciles)

- 5.5 Within the domiciles themselves, formal and structured asbestos management is not covered by Regulation 4, however we have a responsibility to ensure the safety of employees, contractors, visitors and others under general requirements surrounding health and safety law (The Health and Safety at Work Act 1974, particularly sections 2 and 3).
- 5.6 Hanover acknowledge our responsibility to ensure our customers are living in an environment which is free from significant risks to their health.
- 5.7 The initial priority for Hanover is the collation and completion of the Regulation 4 areas (Control of Asbestos Regulations) as detailed above. Information will, however, continue to be collected on the domestic properties as time and opportunity present itself for example when repairs, planned and void works are completed involving penetrative works to the fabric of the building. This will add further “management” surveys and “refurbishment and demolition” (R&D) surveys to the asbestos database.
- 5.8 It is not mandatory for a management or R&D survey to be in place for every domestic property within Hanover. However, the overarching legislation (predominantly the Health and Safety at Work Act) must be adhered to which includes:
- Ensuring risks are assessed (we can demonstrate this by determining which stock was built prior to year 2000, carrying out management surveys on communal stock and surveying properties when any work is taking place)
  - Providing necessary information to protect employees and others (surveys shared with anyone carrying out work or likely to disturb asbestos, before work begins)
  - A duty to protect employees and others (by general awareness of where asbestos is situated within the housing stock, notifying new and existing customers, training employees, ensuring safe systems of work are in place)

Therefore, it is key to ensure Hanover’s asbestos database is up to date with all current asbestos information for all properties and this is shared with relevant

employees and contractors likely to disturb asbestos, and we keep good levels of awareness with employees, contractors and customers of the health implications and process in place to manage asbestos effectively.

- 5.9 Property archetypes will initially be reviewed to garner information relating to common asbestos installations which can help target further surveys. In line with HSE guidance initial objectives are circa 10% of archetypes to begin with regular review where anomalies are encountered. Hanover will not however clone data to be used from properties with similar archetypes, this will only be used to inform further targeted surveying regimes.
- 5.10 The long-term aspiration is to complete surveys to 100% of properties constructed prior to 2000 as outlined in 5.7. The data from these reports will be extracted into a separate tab within the asbestos register as detailed in the previous section. When reviewing risk for these items we will combine the material score with the accessibility of the item to determine action requirements. Generally, this will mean that items that are readily accessible and damaged or licensable will be prioritised for action.
- 5.11 Reinspection of these items is not mandatory and the above risk-based approach, combined with the provision of asbestos information to our customers, reduces risk of asbestos exposures. But it must also be noted that when management surveys are completed for domestic properties, the surveyor may suggest a reinspection date.

#### Asbestos Survey types and competency

- 5.12 Asbestos surveying will be completed by an organisation that currently holds UKAS accreditation to both ISO17020 and ISO17025 covering both inspection and analysis.
- 5.13 There are 2 types of asbestos survey which are detailed within HSE Guidance document HSG264 Asbestos: The Survey Guide. All surveys completed on behalf of Hanover are to be completed in accordance with the requirements of this document combined with project specific scoping documents which will form the “contract” with regards asbestos surveying. An example of an Asbestos Management Survey Scoping document can be seen in appendix 1 of this document.
- 5.14 All surveys must be checked by the requesting Hanover employee upon receipt to validate the suitable and sufficient nature of the document.
- 5.15 All capital and planned refurbishment works will be preceded by a Refurbishment Asbestos Survey and will be suitably planned to ensure adequate scope of works are provided to the service provider.

## **6 REMEDIAL WORKS WITH ASBESTOS MATERIALS**

### Non-Licensed Asbestos Work

- 6.1 All Non-licensed asbestos works will be undertaken in compliance with the Control of Asbestos Regulations 2012.

Asbestos removal works on asbestos materials normally not requiring a license as defined by the exemptions in Regulation 3(2) of the Control of Asbestos Regulations 2012 are expected to still be completed by licensed contractors as detailed below.

- 6.2 All, non-licensable asbestos work will be carried out using the most effective method or combination of methods which minimises fibre release and so reduces exposure to the lowest levels reasonably practicable.
- 6.3 All asbestos works in occupied or tenanted properties, regardless of whether the exemptions under Regulation 3(2) of the Control of Asbestos Regulation 2012 applies or not, shall be carried out by an approved licensed contractor.

#### Licensed Asbestos Work

- 6.4 Only Contractors holding a licence granted by the Health and Safety Executive (HSE) shall work on or with sprayed asbestos coating, asbestos thermal insulation and asbestos insulating board (AIB).
- 6.5 Contractors carrying out licensed work must provide at least 14 days notification to the HSE before starting work. Such work must be inspected, and air tested by a UKAS accredited (ISO 17020 & 17025) laboratory, with a Certificate of Reoccupation issued upon completion of the work.
- 6.6 It is expected that the provision of air monitoring will be sourced by Hanover separate to the provision of the removal contractor, this could be by the asbestos surveying contractor or by a third party, but should not be provided by the contractor carrying out the work.

#### Asbestos Waste Management

- 6.7 The management of asbestos waste will be carried out in accordance with the requirements of The Control of Asbestos Regulations 2012, Part 2, P24 and The Special Waste Amendment (Scotland) Regulations 2004.

It is a requirement that following any asbestos remediation works that the contractor completing the works provides us with the requisite waste consignment notice.

- 6.8 Irrespective of which Hanover department has ordered the works, all consignment notices must be sent to the Customer Safety Team, so that the CSC can keep the asbestos database completely up to date. Failure to receive consignment notes will lead to the database suggesting asbestos is still present in a property when it has been removed.

### 7. KPI (Key Performance Indicator) Reporting

- 7.1 Our performance regarding communal asbestos management (compliance with Regulation 4 of CAR), will be reported as required, through our established Performance Management Framework.
- 7.2 Measures will include:
- Number of communal properties requiring an Asbestos Management Survey;

- Number of communal properties which have a suitable and sufficient Asbestos Management Survey in place
- (Optional OPI) Number of domestic properties which have an Asbestos Management Survey in place and percentage this represents of the stock (not mandatory).

## 8. EMERGENCIES, INCIDENTS, NEAR MISSES & ENFORCEMENT

### Asbestos Emergency Procedures

- 8.1 Any person completing work on Hanover properties will be expected to have their own emergency procedures in accordance with Regulation 15 of CAR12. Hanover will check these prior to award of works/contractor approval along with the current training records for the organisation/individual.
- 8.2 In the case of an incident involving asbestos, the initial priority is the prevention of exposure to individuals.
- 8.3 Hanover's Asbestos emergency procedures can be located in appendix 2 of this document.**
- 8.4 The Asbestos responsible Person or deputy will be responsible for arranging a UKAS accredited asbestos analyst to attend site within 4 hours to complete air monitoring where necessary reassurance is required.
- 8.5 Depending on the incident the responsible person or deputy may also request the attendance of a Licensed Asbestos Removal contractor to complete cleaning or decontamination.
- 8.6 The Asbestos Responsible Person will ensure an investigation is carried out following any asbestos incident or near miss.

### Overarching Corporate Emergency Procedures

- 8.7 The Business Continuity Plan (BCP) details arrangements and processes to follow in the event of a major emergency (unplanned event). It covers our emergency response, major incident management and recovery, and full-service resumption and return to business as usual.
- 8.8 We will liaise with and notify HSE (Health and Safety Executive) and any other enforcing authority when required relating to asbestos safety.
- 8.9 The Responsible Person (or in their absence, the Head of Asset Management) is responsible for reporting incidents to the HSE as required (including RIDDOR reportable incidents), and for managing contact with the HSE and other statutory bodies.

- 8.10 We will work closely with the relevant enforcing authority, HSE, and other statutory bodies to obtain their advice and assistance in relation to asbestos safety within our properties. This can include audits and inspections of our properties containing ACMs and promoting asbestos awareness amongst our customers.
- 8.11 We will respond promptly and positively to any enforcement or improvement action that is taken by a statutory body. Our response will include the following:
- We will review the conclusions of the statutory body and engage with them if we have reason to challenge or seek clarification of their conclusions and/or requirements.
  - We will ensure that requirements are addressed within the specified or agreed timescale. We will identify if there are similar issues within our other properties. If so, we will take appropriate remedial action. 8.12 Full details will be recorded and reported to the 'duty holder,' Chief Executive, ELT, and SMT.
- 8.13 All asbestos related incidents, including near exposure, disturbance, or customers complaining of ill health effects due to asbestos exposure, will be logged including details of any follow-up actions. This may include, but is not limited to the following:
- Undertaking remedial work.
  - Investigating the circumstances that led to the incident.
  - Undertaking remedial action that is required to improve asbestos safety, the location of the asbestos incident and at other properties.
  - Communicating with customers to improve asbestos awareness.
  - Working with the relevant local enforcing authority, police, HSE or other statutory agencies.
  - Making a claim with our insurers.
- 8.14 We will review all incidents, including near misses, (particularly those where claims are made) to ensure that any lessons learnt are reflected in updates to policies, procedures and working practices in order to reduce the number of incidents and near misses and to mitigate our liability.
- 8.15 In the event of any confirmed exposure to asbestos fibres at any Hanover development, we will attend as soon as is reasonably practicable and carry out a full investigation. Once the causes have been identified, immediate remediation will take place to mitigate any further risk. If any customers, employees, or others complain of any health effects, insist they seek immediate medical attention, telling the medical professionals that they have suspected exposure to asbestos fibres.

[Information for Customers](#)

- 8.16 We will promote awareness of asbestos safety and the risks arising from asbestos on our website and through other channels such as leaflets and customer newsletters.
- 8.17 When a person becomes the lawful occupier of one of our properties which was built before 2000, we will ensure they are provided with asbestos safety information relevant to their home. This will include all of the following:
- General information about asbestos safety in the home.
  - Specific information about ACMs contained in their home where available
  - Details about what to do in the event of an asbestos safety incident, including, where relevant, the process for alerting us about the incident.
  - Details of their responsibilities in relation to asbestos safety, including, where required, any obligations that are contained in the tenancy agreement we have with them to seek our agreement prior to making any changes to their home.
- 8.18 We will encourage customers to inform us of any changes in the composition or needs of their household, and we will periodically contact customers to find out if their circumstances have changed.
- 8.19 On request, we will supply customers with relevant information from the asbestos risk assessment which is relevant to the property in which they live.

## **9 TRAINING**

- 9.1 The R&CSM is the named responsible person within Hanover and is responsible for the development of systems and processes to provide a robust, effective, and efficient compliance methodology to ensure compliance is met by Hanover and the safety of our customers is maintained at all times. The training course the R&CSM is required to obtain is the Management of Asbestos in Buildings (including Asbestos Removal) P405.
- 9.2 The CSC is the named deputy responsible person and holds responsibility for the day-to-day management of the asbestos database. The training course the CSC will be required to obtain is the P405.
- 9.3 For employees receiving repairs and emergency calls, to ensure competency, understanding and how to appropriately triage and correctly identify the nature of the problem reported, the repairs team will have to complete the following:
- Read, understand, and sign acknowledgement of Hanover's Asbestos Policy and this Procedure
  - E Learning asbestos awareness training (as required)
  - 2 yearly E- Learning asbestos awareness training

- 9.4 For employees involved in Repairs/ Remedial work, to ensure competency, understanding and how to instruct work efficiently and accurately, they will have to complete the following:
- The Customer Safety Officers, Contracts Officers, Customer Safety Assistant and Customer Safety Co-ordinator will be required to complete 2 yearly asbestos awareness e-learning training.
  - The Customer Safety Officers, Contracts Officers, Customer Safety Advisor and Customer Safety Co-ordinator have confirmed that they have read and understood the asbestos policy and asbestos management plan.
  - The Customer Safety Officers and Contract Officers will require to obtain P405 as they will be managing asbestos works and carrying out reinspection surveys.
- 9.5 Hanover will ensure that all employees whose work could foreseeably disturb the fabric of a building and expose themselves or others to asbestos, or who supervise and influence the work, receive asbestos awareness training before commencing such work, and refresher training at intervals of 12 months. The training provided will meet the criteria specified in Regulation 10, P235 of *L143 Approved Code of Practice for Managing and Working with Asbestos*.
- 9.6 No Hanover employee or contractors will be allowed to work in areas in which they could foreseeably disturb ACMs without asbestos awareness training.
- 9.7 All contractors carrying out works within our properties must have received asbestos awareness training with expected refresher training delivered annually. The expected standard for this training is IATP or UKATA approved training providers to ensure a good standard of delivery is received.

<b>Job Role</b>	<b>Briefing on Hanover Policy, Procedure &amp; Emergency procedure</b>	<b>E Learning Asbestos Awareness</b>	<b>P405 Asbestos Management</b>
Repairs employees	X	X	
Telecare and Development employees	X	X	



Customer Safety Assistant	X	X	
Customer Safety Officer & Contracts Officer	X	X	X
Head of Asset Management & Sustainability, Health, Safety & Wellbeing Manager	X	X	
Customer Safety Co-ordinator	X	X	X
Repairs and Customer Safety Manager	X	X	X

## **10. AUDIT AND ASSURANCE**

10.1 The Repairs and Customer Safety Manager will carry out an annual audit review as part of the AMP document review for the following areas to determine if the performance and controls in place confirm suitable levels of assurance that Hanover are fulfilling their duties as an employer and a landlord in line with the Asbestos Policy and this AMP:

- Compliance with Regulation 4 – a survey and re-inspection programme is in place for all non domestic properties (e.g. garage sites and communal areas). Reporting is in place to the business to report compliance with regulation 4 and the statistics are confirmed as accurate.
- The Asbestos database - Is being updated regularly updated with new asbestos information from across the business, checking recent surveys and removal or remediation is being updated; Is being shared with contractors and others likely to disturb asbestos, checking requests from contractors and reviewing areas of planned works or repairs where penetrative works are taking place
- New Contractors and Capital Works – Confirm if asbestos information is fully being shared within the pre construction information, ensuring the appropriate management surveys and R&D information is being provided and if this is deemed insufficient relating to the scope of the project, additional surveys and information is being ordered prior to work occurring.
- Contractor competency and contract management – Confirm if the existing contractors carrying out surveys, sampling, remedials, or removals are in contract, have performance monitoring in place, are being met with regularly and documented, are UKAS accredited and have provided Hanover with the latest insurances
- Staff training – Ensures all specialist and awareness training for staff is in date and refreshers are scheduled
- Emergencies, Incidents, Near Misses and Enforcements – Ensures that all emergencies, incidents, near misses and enforcements have been actioned appropriately in line with this AMP

## **11. IMPLEMENTATION & REVIEW**

11.1 The Director of Asset Management is responsible for ensuring that this procedure is implemented by all concerned.

11.2 The Repairs and Customer Safety Manager will ensure that this procedure is reviewed at least every year.

Department	Asset Management
Author	Repairs and Customer Safety Manager
First Approved	October 2023
This Version Approved	01/10/2023
Approved by	Head of Asset Management
Next Review Due	01/10/2024

## Appendix 1 – Management Survey Example Scope

# Asbestos Management Survey

## Specification - Template

### INTERIOR

#### Throughout

- All rooms including cupboards are to be included within the survey report
- Any rooms not accessed are to be recorded as inaccessible
- Comments relating to the general construction of each room are to be completed within the room comments section for each room.
- Access is to be made to all void areas such as within boxings, risers and behind bath panels etc. but only where this is deemed reasonably practicable i.e. where access can be made without causing damage. Where not reasonably practicable all inaccessible void areas are to be recorded as inaccessible presumed.
- Access is to be made beneath all modern floor coverings where this is deemed reasonably practicable i.e. where access can be made without causing damage. Where access is not reasonably practicable all inaccessible floors are to be recorded as inaccessible presumed.
- No access will be made within live electrical services these areas are to be recorded as inaccessible presumed.
- Samples are to be taken of all potential ACMs identified during the survey including lookalike materials such as supalux and santex
- Where potential ACMs appear to be uniformed i.e. the same floor tiles are in situ throughout, they can be sampled in one room and then strongly presumed (as sampled) to be the same material within other rooms.
- Potential ACMs cannot be strongly presumed (as sampled) between floors. Each floor requires its own set of samples.
- Textured coatings are not homogenous and therefore samples are to be taken from all rooms of each installation i.e. one sample should be taken from the ceiling and a separate sample taken from walls when identified on both.
- Potential ACMs should only be presumed where an item is not accessible to sample or sampling is deemed to be unsafe.
- **Roof voids/ loft spaces**
- All roof voids/ loft spaces are to be included within the survey report

- Roof voids/ loft spaces are to be accessed using surveyor ladders
- Each roof void/ loft space will need to be risk assessed before access to determine safe access before entry i.e. will crawl boards be required, is there adequate lighting etc. No access should be made where access is deemed to be unsafe
- Any roof voids/ loft spaces not accessed are to be recorded as inaccessible
- Where access is limited due to large amounts of stored items etc. the roof void/ loft space should be recorded as limited access
- Comments relating to the general construction of each roof void/ loft space are to be completed within the room comments section for each roof void/ loft space present.
- Samples are to be taken of all potential ACMs identified within the roof void/ loft space including all lookalike materials such as supalux etc.
- Potential ACMs should only be presumed where an item is not accessible to sample or sampling is deemed to be unsafe

## **External Areas**

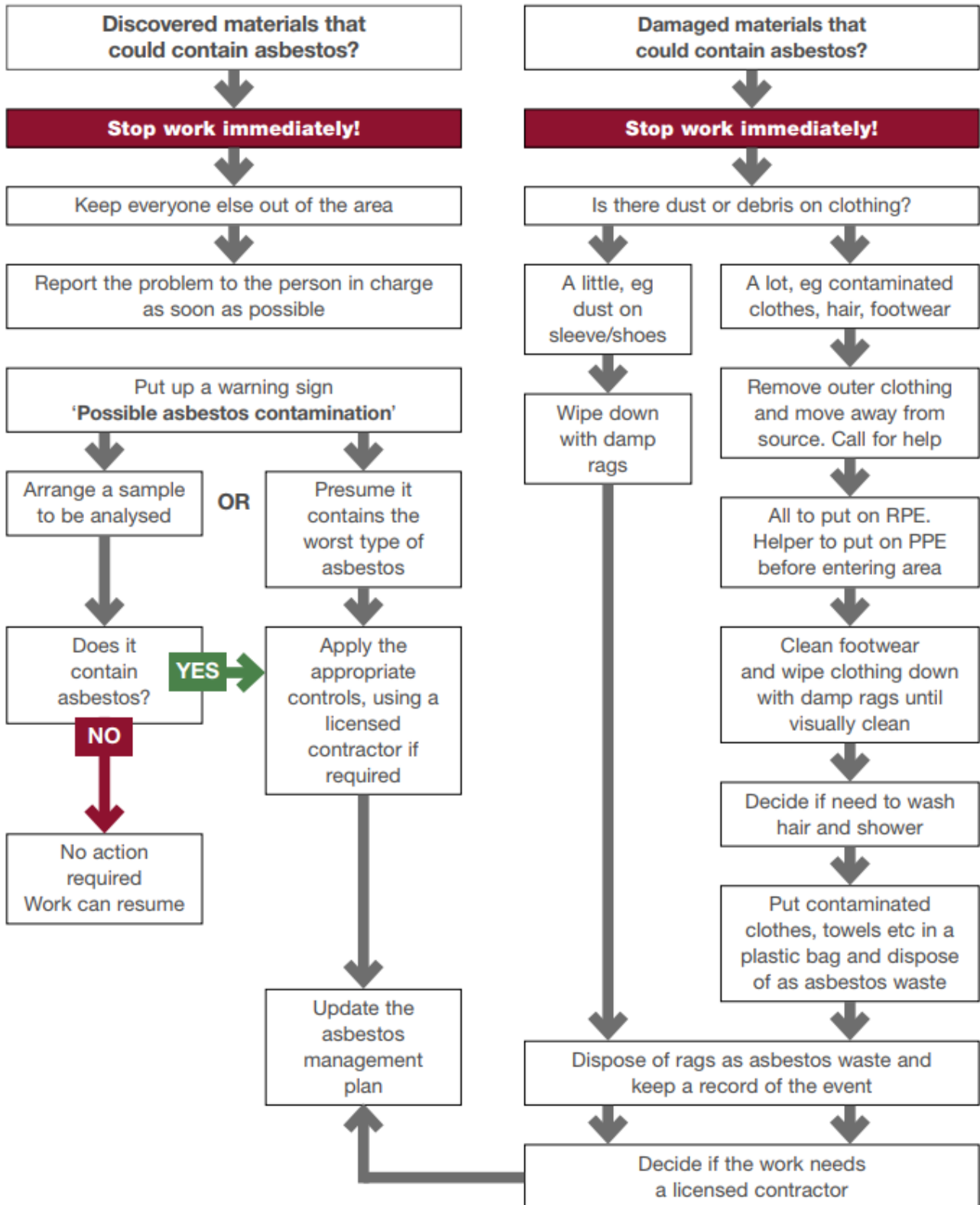
### **Exterior**

- All areas of the building exterior including out buildings are to be included within the survey report
- External areas for flats and maisonettes etc. are outside the scope of works and should be included as part of the communal areas survey report, however if the premises contains any attached exterior cupboards etc. these will be included within the survey report
- Any exterior areas of the building or out buildings not accessed are to be recorded as inaccessible
- Comments relating to the general construction of the building exterior are to be completed within the room comments
- Samples are to be taken of all potential ACMs identified during the survey including lookalike materials such as supalux
- 4.7 meter ladders are to be used to access high level elevations of the exterior of the building where it is deemed safe to do so
- Potential ACMs should only be presumed where an item is not accessible to sample or sampling is deemed to be unsafe

**If any of the above cannot be completed, then the client's representative must be contacted prior to leaving site.**

## Appendix 2 – Emergency Procedures

### Flow chart



## Appendix 3 Work Stream Requirements

Work Demand	Scenario	External / Internal /Category	Intrusive Works required?( Y/N)	Percentage of Survey	Asbestos Survey Req'd (Yes / No / Available)	Documentation required (A full scope of works is required)	Managers Action Must Be In Place Prior to Works (including Risk assessment of activity training and procedures)
Planned	Roofing and roughcasting of a full block Inc. fascia, soffit and rainwater	External (large)	Yes to fascia, soffit and roof	100%	Yes	Issue Works Order for survey	Review existing asbestos surveys for available data. Request and review Asbestos Report for specific works Request asbestos removal where applicable.
Planned	External Wall Insulation	External (large)	Yes	100%	Yes	Issue Works Order for survey	Review existing asbestos surveys for available data. Request and review Asbestos Report for specific works Request asbestos removal where applicable.
Reactive and Planned	Loft access	Internal (n/a)	No - observational only	Not required	No	None	Proceed with caution
Reactive and Planned	Loft access	Internal (small)	Yes to targeted areas	100%	Yes	Issue Works Order for survey	Request and review Asbestos Report for specific works Review existing asbestos surveys for available data. Walk boards installed and asbestos material left in situ (no exposure or disturbance)
Planned Gas	Heating installation	Internal and external (flue) (medium)	Yes	100%	Yes to targeted areas	Issue Works Order for survey	Review existing asbestos surveys for available data. Request and review Asbestos Report for specific works Request asbestos removal (including MITV) where applicable.
Planned	Window replacement	Internal and external (medium)	Yes	100% (before & during works)	Yes for mastic	Issue Works Order for survey	Request and review Asbestos Report for specific works Review existing asbestos surveys for available data. Proceed with caution
Planned	Kitchen and bathroom replacement	Internal (small)	Yes	100%	Yes	Issue Works Order for survey	Review existing asbestos surveys for available data. Request and review Asbestos Report for specific works Request asbestos removal (including MITV) where applicable. Asbestos Report for specific works

Work Demand	Scenario	External / Internal /Category	Intrusive Works required?( Y/N)	Percentage of Survey	Asbestos Survey Req'd (Yes / No / Available)	Documentation required (A full scope of works is required)	Managers Action Must Be In Place Prior to Works (including Risk assessment of activity training and procedures)
Reactive	Rebuild brickwork and steps to property	External (n/a)	Not to property	0%	No	None	Review existing asbestos surveys for available data. Proceed with caution
Reactive and Planned	Fencing work	External (N/A)	Not to property	0%	No	None	Proceed with caution
Reactive and Planned	Cavity Wall Insulation removal	External (n/a)	Yes	Not required	No	None	Review existing asbestos surveys for available data. Proceed with caution
Reactive and Planned	Chimney Replacement	External (n/a)	Yes	0-100%	No	Issue Works Order for survey	Request and review Asbestos Report for specific works Review existing asbestos surveys for available data. Proceed with caution
Reactive	House clearances	Internal (small)	No	100%	Yes	None	Review existing asbestos surveys for available data. Proceed with caution
Reactive and Planned	Gas and electric checks	Internal (n/a)	No	Not required	No	None	Proceed with caution
Reactive and Planned	Floor voids opening	Internal (emergency)	Yes	0-100%	No	None	Proceed with caution. If required implement emergency process, stop works until Surveyor/ MITV present on site if not covered by initial asbestos survey request.
Reactive and Planned	Floor voids opening	Internal (planned)	Yes	0-100%	Yes	Issue Works Order for survey	Request and review Asbestos Report for specific works Proceed with caution. If required implement emergency process, stop works until Surveyor/ MITV present on site if not covered by initial asbestos survey request.
Reactive	Medical adaptations (other than bathrooms)	Internals (small)	Yes	100%	Yes	Issue Works Order for survey	Review existing asbestos surveys for available data. Request and review Asbestos Report for specific works Request asbestos removal (including MITV) where applicable.



Work Demand	Scenario	External / Internal /Category	Intrusive Works required?( Y/N)	Percentage of Survey	Asbestos Survey Req'd (Yes / No / Available)	Documentation required (A full scope of works is required)	Managers Action Must Be In Place Prior to Works (including Risk assessment of activity training and procedures)
Reactive	Kitchen / Sanitary ware	Internal (small)	Yes	100%	Yes	Issue Works Order for survey	Review existing asbestos surveys for available data. Request and review Asbestos Report for specific works
Reactive	Pin Board/Signage install or removal	Internal (small)	Yes	100%	Yes	Issue Works Order for survey	Review existing asbestos surveys for available data. Request and review Asbestos Report for specific works
Reactive	Fire Door Removal and/or install	Internal (small)	Yes	100%	Yes	Issue Works Order for survey	Review existing asbestos surveys for available data. Request and review Asbestos Report for specific works
Reactive	Reactive/renew damage walls & ceilings	Internal (small)	Yes	0-100%	Yes (depending on house type)	Issue Works Order for survey	Review existing asbestos surveys for available data. Request and review Asbestos Report for specific works
Reactive	Remove and replace ceramic tiles	Internal (small)	Yes	0-100%	Yes	Issue Works Order for survey	Review existing asbestos surveys for available data. Request and review Asbestos Report for specific works
Reactive	Surface containing texture coatings	Internal (small)	Yes	0-100%	Yes	Issue Works Order for survey or scrape	Review existing asbestos surveys for available data. Request and review Asbestos Report for specific works Request MITV to scrape coating
Reactive	Surface without texture coatings downstairs	Internal (small)	Yes	0%	No	No	Review existing asbestos surveys for available data. Proceed with caution