

ASBESTOS POLICY

Version Number	1
Revision Date	May 2023
Department	Asset Management
Author	Repairs and Customer Safety Manager
Reason for Policy Creation/Revision	Full Review and Update on Job Roles and Responsibilities
Data Protection	As a result of the related procedure, data on our customers is shared with 3 rd parties of Hanover. Our Data Sharing Agreement Procedure covers us for this
Equalities Impact	We have considered any equalities impact and consider there to be none
Sustainability	Hanover will ensure the management of asbestos meets environmental and legislative requirements
Proof Read By	Head of Asset Management
Date Approved	17/05/2023
Approved By	SMT/ELT
Next Review Due	May 2026
Audience – Training and Awareness Approach	Policy will be circulated to all relevant staff to ensure awareness of the content
Effective Date	22/05/2023
Internal References – Policies & Procedures (Located on The Hub)	Asbestos Procedure (Asbestos Management Plan AMP)
External References	As detailed below in section 3

1. POLICY PURPOSE

- 1.1 This policy sets out how Hanover meets all legal and regulatory obligations and to ensure best practice is followed in relation to Asbestos.

2. POLICY SCOPE, EXPLANATIONS OR REQUIREMENTS

- 2.1 Hanover is one of Scotland's leading housing associations, providing homes to over 4600 tenants across Scotland. Many of the properties we manage are used to deliver a range of care and support services.
- 2.2 All properties built before the year 2000 may contain asbestos within various construction materials, fixtures and fittings. We are responsible for ensuring that an Asbestos survey is undertaken before any activities or work commences which are likely to disturb asbestos. We are required to maintain and share a comprehensive database containing all known asbestos information which will be shared with all parties carrying out work or activities likely to disturb asbestos.
- 2.3 This policy covers asbestos surveying, reinspection, asbestos removal, licensed and non-licensed work, air testing and emergency procedures.
- 2.4 We would not usually undertake work in any domestic premises which are not wholly owned by Hanover e.g., Developments where the properties are owned by others (factored sites). However, if works are required to be undertaken by Hanover, we will ensure we have suitable and sufficient information regarding the risk and likelihood of disturbing asbestos. For communal areas in factored sites, we will ensure we have sufficient information for these sites before any activity or work which is likely to disturb asbestos.
- 2.5 This policy is supported by detailed procedures and processes which should be read in conjunction with this policy.

3. LEGISLATION, REGULATIONS & GUIDANCE

- 3.1 In terms of Asbestos responsibilities, this policy and our Asbestos Procedure comply with the wide range of legal and guidance requirements which are listed as follows:
- The Health and Safety at Work etc. Act 1974
 - Control of Asbestos Regulations (CAR) 2012
 - 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
 - The Housing Scotland Act 2006

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- The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR 2013)
- Construction, Design and Management Regulations 2015 (CDM 2015)
- The Workplace (Health, Safety and Welfare) Regulations 1992
- Personal Protective Equipment at Work Regulations 1992
- Environmental Protection Act 1990
- The Waste (Scotland) Regulations 2011

4. POLICY OBJECTIVES

- 4.1 The aims of this policy are to keep the general public, customers and employees safe from danger and ensure that we fulfil our legal and regulatory obligations relating to the management of asbestos.
- 4.2 To meet all legal and regulatory obligations and to ensure best practice is followed in relation to asbestos, we will ensure we carry out suitable and sufficient management surveys for all communal areas for all of our properties. Where we do not hold survey information for any property where penetrative works will take place, we will instruct further relevant surveys. Where we have identified asbestos or suspect asbestos to be present, we will manage these areas appropriately and share information with all relevant contractors, customers, employees, and general public who could come into contact with these areas. We will also ensure all work is carried out by suitably qualified and competent contractors.
- 4.3 Full details of how we will meet these obligations are set out in the overarching Asbestos Procedure.

5. EMPLOYEE ROLES RESPONSIBILITY

- 5.1 Day-to-day responsibility for the operation and monitoring of our Asbestos policy, procedures and processes lies with the Repairs and Customer Safety Manager (R & CS Manager). The R & CS Manager is the internal 'responsible person', in liaison with the Head of Asset Management develops and implements policies, procedures and safe working practices when necessary to enable us to meet our obligations under all relevant legislation and regulations. However, all relevant employees have a responsibility to ensure that the procedures are applied as instructed.
- 5.2 The Chief Executive has over responsibility and manages this through the Director of Asset Management and Head of Asset Management.
- 5.3 The Director monitors the implementation and effectiveness of the policy and procedure and ensures all risks relating to asbestos are recorded and reported in accordance with our Risk Management Framework. The Director is appointed as the "duty holder" as defined by CAR 2012.
- 5.4 Full responsibilities are detailed in the overarching Asbestos Procedure.

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6. EDUCATION AND TRAINING

- 6.1 We will ensure that customers are provided with relevant information highlighting the risks of having Asbestos Containing Materials (ACMs) in their homes and communal areas.
- 6.2 We will deliver relevant training to employees as defined in our Learning and Development Teams training needs analysis.
- 6.3 Further details for education and training for specific roles, responsible for asbestos is set out in the overarching Asbestos Procedure.

7. CONTRACTOR PROCUREMENT & MANAGEMENT

- 7.1 Contractors will not be engaged unless they are able to demonstrate competence in asbestos by providing evidence of experience in this type of work, relevant references and that no enforcement or legal action has been taken against them with regard to non-compliance.
- 7.2 Contractors must also be able to demonstrate an understanding of relevant regulations within the Health and Safety section of the Invitation to Tender stage of procurement.
- 7.3 Suitable evidence and assurance will be obtained by the Customer Safety Team to demonstrate work has been completed to the required standard and to confirm compliance with our statutory obligations.

8. DATA PROTECTION

- 8.1 All data gathered, held and used regarding our customers can be shared with 3rd parties working with Hanover, using our Data Sharing Agreement Procedure covers us for this. This conforms to our Data Protection Policy and Procedure and Customer Privacy Policy.

9. MONITORING, PERFORMANCE MEASUREMENT AND REPORTING

- 9.1 Our performance with regard to asbestos surveying, management and remedial works, will be reported as required through our established Performance Management Framework.

10. REVIEW

- 10.1 This Policy will be reviewed every 3 years or earlier as required