

# Albyn Group Asbestos Policy

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<b>Corporate Fit</b>	
Internal Management Plan	✓
Risk Register	✓
Business Plan	✓
Regulatory Standards	✓
Equalities Strategy	
Legislation	✓

## Contents

- 1.0 [Introduction](#)
- 2.0 [Legal and Regulatory Framework](#)
- 3.0 [Aims and Objectives](#)
- 4.0 [Related Documents](#)
- 5.0 [Scope](#)
- 6.0 [Definitions](#)
- 7.0 [Roles and Responsibilities](#)
- 8.0 [Policy Statement](#)
  - 8.1 [Approach](#)
  - 8.2 [Responsible Person](#)
  - 8.3 [Asbestos Register](#)
  - 8.4 [Asbestos Management Plan](#)
  - 8.5 [Identification of assets with asbestos](#)
  - 8.6 [Identification of location of asbestos](#)
  - 8.7 [Assessment of condition and management requirements](#)
  - 8.8 [Monitoring of management of asbestos](#)
  - 8.9 [Testing for asbestos](#)
  - 8.10 [Repairing, encapsulating or removing asbestos](#)
  - 8.11 [Decanting of tenants](#)
  - 8.12 [Information for contractors and employees](#)
  - 8.13 [Information for tenants and other asset users](#)
  - 8.14 [Employee competence and training](#)
  - 8.15 [Contractor competence and training](#)
- 9.0 [Performance, Monitoring and Reporting](#)
- 10.0 [Complaints](#)
- 11.0 [Equal Opportunities](#)
- 12.0 [Policy Review](#)

## 1.0 Introduction

- 1.1 Albyn Group aims to incorporate our Purpose, Mission, Values and Vision into our policies and decision making.

With that in mind, we aim to follow our guiding principles that apply to all policies: <https://www.albynhousing.org.uk/about-us-2019/our-history/>

- 1.2 Asbestos is the collective name given to a group of fibrous materials that are flexible, mechanically strong, and resistant to stretching, heat and chemicals. It has been used in various building products and materials over a long period of time, but was most commonly used in construction between 1950 and 1980, with asbestos cement used until 1999.

Albyn accepts that the majority of our homes, common areas, garages and offices that were built before 2000 are likely to contain asbestos.

- 1.3 When in good condition and undamaged, asbestos is not dangerous.

However, if disturbed – for example, by drilling, sanding, being broken up, or through general deterioration over time – the asbestos fibres become airborne. Inhaling these fibres can cause serious health problems, primarily to the lungs. Health problems typically occur around twenty years after exposure.

The use of asbestos has been banned in the UK since 1999. However, it is still present in many homes and other buildings. Health and Safety regulations now protect people against the risks from asbestos.

## 2.0 Legal and Regulatory Framework

- 2.1 Albyn Group has duties to manage asbestos under the following legislation:

- **Control of Asbestos Regulations 2012:** To manage asbestos in non-domestic premises including offices, garages, common areas of residential blocks, and other non-domestic premises we own or manage.
- **Construction (Design and Management) Regulations 2015:** To ensure any construction work can be carried out, so far as is reasonably practicable, without risk to the health and safety of any individual affected by the project. Construction work includes the development of new homes as well as the refurbishment, repair, maintenance and upkeep of existing homes and other buildings. Individuals affected by a project includes tenants and other residents of our homes, as well as contractors and Albyn Group employees.

- 2.2 As a landlord, Albyn Group has a general duty of care towards our customers, our tenants, and other residents in the homes we own and manage.

We also have responsibilities under the Regulatory Framework to achieve good outcomes for our tenants and other service users, and under the Scottish Social Housing Charter 2017 to ensure tenants' homes are well maintained.

- 2.3 As an employer, Albyn Group has a general duty of care towards our employees, and specific responsibilities under the Health and Safety at Work etc Act 1974.

- 2.4 This policy also takes account of the HSE Advisory Note on the refurbishment of housing stock likely to contain asbestos.

### 3.0 Aims and Objectives

- 3.1
- To set out a framework to enable Albyn Group to understand and manage the risk from asbestos for all our homes, garages, common areas and offices;
  - To minimise the risk of one of our customers or employees becoming ill as a result of exposure to asbestos in our buildings.

### 4.0 Related Documents

- 4.1 This policy should be read in conjunction with the following:
- Asbestos Management Plan
  - Asbestos Register.

### 5.0 Scope

- 5.1 This policy covers all buildings owned or managed by Albyn Group.

### 6.0 Definitions

- 6.1 **Albyn Group:** Throughout this policy, Albyn Group means Albyn Housing Society and its subsidiary companies.
- 6.2 **Asbestos:** Throughout this policy, this term is used to include asbestos, asbestos-containing materials (ACMs), and materials that we presume contain asbestos.

### 7.0 Roles and Responsibilities

- 7.1 The Director of Assets and Subsidiaries has overall responsibility for this policy.
- 7.2 The Asset Team Supervisor has responsibility for the day-to-day management of this policy for the Asset Management and Investment team.
- 7.3 The Customer Services Manager (North) and Customer Services Manager (South) have responsibility for the day-to-day management of this policy for the Customer Services teams (North) and (South).
- 7.4 The relevant Asset and Investment Assistant has day to day responsibility for maintaining the asbestos register and ensuring that new information from surveys is recorded appropriately.

- 7.5 All employees involved in the management and repair of our buildings are responsible for co-operating with the Responsible Person to ensure that asbestos is managed effectively.

## 8.0 Policy Statement

### 8.1 Approach: We will:

- Appoint a competent and qualified Responsible Person(s) to co-ordinate the management of asbestos;
- Maintain an Asbestos Register that includes all the assets we own or manage, and information on asbestos in each asset;
- Maintain an Asbestos Management Plan that sets out how we will manage asbestos in our homes, common areas, garages and offices;
- Identify which assets may contain asbestos and which will not;
- Identify locations within each asset where asbestos is, or may be, present;
- Assess the condition of any known or suspected asbestos, the risk it poses, and how it will be managed;
- Monitor the completion of actions identified to manage asbestos;
- Test for the presence of asbestos where material will be disturbed by a maintenance or improvement programme, or is vulnerable to damage;
- Repair, remove or encapsulate (as appropriate) any asbestos that will be disturbed by a maintenance or improvement programme, or is vulnerable to damage;
- Decant tenants from their homes where the removal of asbestos is necessary and cannot be managed safely with the household remaining in situ;
- Provide information on the location, type and condition of asbestos to our contractors, our employees, and others who may disturb it in the course of their work;
- Provide information to tenants and other users of our homes, offices, garages and other assets, on the risks of disturbing asbestos and specific locations within the property they use;
- Ensure that employees who may encounter asbestos in the course of their work are appropriately trained and qualified for the work they are required to carry out;
- Ensure that contractors employed to work with asbestos are appropriately qualified and competent.

### 8.2 Responsible Person: The Director of Assets and Subsidiaries is Albyn Group's Responsible Person for asbestos management.

### 8.3 Asbestos Register: We will hold an Asbestos Register of all assets including:

- Whether asbestos is definitely not present (ie assets built after 1999);
- Any information from a Refurbishment and Demolition survey of the asset;
- Any information from a Management survey of the asset;
- Any information cloned from similar assets.

The register will be available for employees to inspect, and will be provided in an appropriate format to contractors carrying out work in our housing, common areas, offices and other assets.

8.4 **Asbestos Management Plan:** We will hold an Asbestos Management Plan that sets out how we will manage asbestos in our stock. The plan includes the Asbestos Register (above) as well as the schedule for reinspecting asbestos.

8.5 **Identification of assets with asbestos:** Albyn Group assumes that assets built before 2000 contain asbestos unless we have strong evidence to the contrary. We will assume that assets built from 2000 onwards do not contain asbestos.

8.6 **Identification of location of asbestos:** Albyn Group will take reasonable steps to identify the location of asbestos in all assets where asbestos is known or suspected to be present.

We will carry out a Refurbishment and Demolition survey where:

- Asbestos is known or suspected to be in an asset, *and*
  - This may be disturbed by an imminent major works programme or repair.
- Where multiple properties in a major works programme require Refurbishment and Demolition surveys, a representative sample of the properties may be surveyed, rather than each individual asset. The sample will be chosen to ensure that the end data provides sufficient information on the location and type of asbestos to allow the effective management of risks during the works.

We will carry out a Management Survey where asbestos is known or presumed to be in an asset, *and*

- The asset is an office or common area, *or*
- The asset is a dwelling or garage, and we currently have only age-based data, and there is no data that can be cloned from a similar asset.

Where a survey has not been carried out on a particular dwelling or garage, or has not covered a particular location within the asset, information may be cloned from similar assets (ie assets built at the same time in the same town or village). Albyn will presume a material contains asbestos unless there is strong evidence to conclude that it does not.

8.7 **Assessment of condition and management requirements:** Albyn will assess the risk of asbestos based on:

- The condition of the asbestos (whether it is broken or damaged);
- Its location (whether the location increases the risk of damage).

Where asbestos is in good condition and in a low-risk location and does not affect an imminent repair or improvement programme, Albyn Group's policy is to leave it in situ and monitor it.

Other asbestos will be repaired, encapsulated or removed, as appropriate, and the Asbestos Register and Asbestos Management Plan updated accordingly.

Asbestos in communal areas and offices will be monitored annually to ensure that any deterioration in its condition is noted and addressed. Such inspections will be recorded in the Asbestos Register.

8.8 **Monitoring of management of asbestos:** The completion of actions identified in the Asbestos Management Plan will be monitored by the Asset Management and Investment team.

8.9 **Testing for asbestos:** Where asbestos is either in poor condition, or at risk of damage, or likely to be disturbed by imminent repairs or improvements, the material will be tested to establish whether it does in fact contain asbestos. The results will be added to the Asbestos Register and Asbestos Management Plan.

8.10 **Repairing, encapsulating or removing asbestos:** The overriding principle of our approach is that asbestos will not be repaired or encapsulated or removed unless:

- It is in a hazardous condition; *or*
- It is vulnerable to damage (such as on the wall of a stairwell); *or*
- Its presence will affect imminent maintenance or improvement.

Asbestos will be removed by a licenced asbestos removal contractor (see 8.15).

Any work undertaken will be recorded in the Asbestos Register and Asbestos Management Plan.

8.11 **Decanting of tenants:** Where we need to remove asbestos and cannot do so safely with the tenant living in the property, we will decant the tenant out temporarily.

For this reason, when properties with asbestos become void, we will look at whether it is appropriate to remove asbestos during the void period if refurbishment work is required in the coming five years.

8.12 **Information for contractors and employees:** An up-to-date version of the Asbestos Register will be available for employees and contractor to inspect.

8.13 **Information for tenants and other asset users:** New tenants of properties built before 2000 will receive information on asbestos at sign up. This will advise them that asbestos is present in almost all buildings built before 2000, that our policy is to leave asbestos in situ unless it is unsafe or to be disturbed, and that they should contact us before doing any DIY on their home so we can advise them if this is likely to be affected by the presence of asbestos.

8.14 **Employee competence and training:** Albyn Group will ensure that employees who may encounter asbestos through their work are appropriately trained and qualified for the work they are required to do. In particular:

- The Responsible Persons for asbestos management will complete BOHS Management of Asbestos in Buildings P405 or equivalent;
- The primary person who maintains the asbestos register and management plan, and operational managers whose teams are required to manage asbestos in the course of their work, will complete BOHS Managing Asbestos in Premises: Duty Holder Requirements P407 or equivalent;
- All employees who come into direct or indirect contact with asbestos in the course of their work will complete annual Asbestos Awareness training.

Training will be refreshed at appropriate intervals.

8.15 **Contractor competence and training:** Albyn Group will ensure that:

- Contractors and surveyors appointed to carry out asbestos management surveys on our assets are UKAS-accredited;
- Competent licenced asbestos removal contractors are appointed for all notifiable non-licenced and licenced work.

## 9.0 Performance, Monitoring and Reporting

9.1 The following will be reported to the Director of Assets and Subsidiaries quarterly:

- Number of dwellings and garages with asbestos;
- Of dwellings and garages with asbestos:
  - % with either an R&D survey, or a management survey complete;
  - % with cloned data in place;
  - % with only age-based data available.
- Number of offices and common areas with asbestos;
- Of offices and common areas with asbestos
  - % with either an R&D survey, or a management survey complete;
  - % with asbestos management inspection completed within last twelve months.

## 10.0 Complaints

10.1 Any complaints about the asbestos policy or asbestos management plan will be dealt with through the normal customer complaints policy.

## 11.0 Equal Opportunities

11.1 This policy does not disproportionately affect any group with a protected characteristic, and complies with Albyn Group's Equalities and Diversity Statement.

## 12.0 Policy Review

12.1 This policy will be reviewed within three years.