

# **ASBESTOS MANAGEMENT POLICY**

Date of approval	September 2023
Responsible director	Paul Butterworth - Executive Director of Assets
Policy monitoring body	WCHG Board
Resident input into policy	Great Places Panel
Date for policy review	September 2026
Linked strategies/policies	Health and Safety Policy Asset Management Strategy Empty Homes Policy Responsive Repairs Policy Fire and Building Safety Management Policy Complaints Comments and Praise Policy Inclusion Strategy
Statutory and Legal Framework	Control of Asbestos Regulations 2012 Health and Safety at Work Act 1974 Management of Health and Safety Regulations 1999 Building Safety Act 2021
Version/date	Final V5 25 <sup>th</sup> September 2023

# Asbestos Management Policy

## 1. Background

- 1.1. Wythenshawe Community Housing Group (WCHG) recognises the role and obligations it has in respect of asbestos management, both as an employer and landlord. This policy clearly states our commitment to meeting these responsibilities, and it directly supports the strategic theme of Great Places within the WCHG corporate plan, that governs our building safety delivery objectives.
- 1.2. Asbestos management is one of the big 6, (now 7) compliance functions, governed by robust legal and regulatory requirements. This policy, along with supporting documents, provides the operational framework through which WCHG will meet its duties.

## 2. Scope

- 2.1. The scope of this policy includes:
  - 2.1.1. All types of asbestos.
  - 2.1.2. All WCHG assets that we own, manage, control or occupy categorised as:
    - 2.1.2.1. Domestic properties all types of homes we provide.
    - 2.1.2.2. Non-Domestic Premises And Common Areas offices, community buildings, communal areas of multi storey blocks and walk up/cottage flats.
- 2.2. For purposes of this policy WCHG is the 'Legal Duty Holder' with responsibility for asbestos management.
- 2.3. This policy applies to all colleagues employed by WCHG and all contractors and suppliers who are employed to work on behalf of WCHG.
- 2.4. All WCHG customers, occupants and their visitors are covered by this policy.

## 3. WCHG Responsibilities

3.1. WCHG will meet all requirements placed upon it by the regulatory and legal framework. Table 1 provides a summary of these:

#### Table 1.

No	Responsibility (Non-domestic premises and common areas)
1	Identify and locate all possible asbestos containing material and assess its condition. This includes the presumption that materials contain asbestos unless there is strong evidence that they do not.
2	Maintain records of the location, condition & risk assessments of the asbestos containing material.

Assess the risk of anyone being exposed to asbestos fibres from the material
Prepare and deliver an Asbestos Management Plan to manage the risks of exposure, and review this approach as a minimum every 12 months
Provide information on the location and condition of asbestos containing materials to anyone liable to work on or disturb them. This includes risk assessments and method statements, plans of work with suitable and sufficient information, instruction and training as part of ongoing asbestos awareness.
Responsibility - Domestic Properties
Regularly risk assess the condition of affected materials before undertaking repairs or re-letting an empty home, and determine if any remedial action is required.
Complete 500 asbestos surveys per year to strengthen our data and stock intelligence surveys.
Issue a letter every year to properties with known or presumed asbestos content, to provide details of the asbestos containing material, its location, and general guidance for customers.
Re-inspect material with a medium or high-risk rating at intervals determined by the Consultant Asbestos Management Surveyor or a four-year maximum interval.

- 3.2. WCHG will use a computer database to store and maintain all asbestos data linked to its assets. All relevant information will be made available to colleagues or third parties with responsibility for their managing or maintaining these assets; or anyone with responsibility for the protection of colleagues or visitors under Health and Safety Legislation.
- 3.3. This includes the display of asbestos warning messages on works orders (electronic or paper based) issued to internal operatives and external contractors when the property or building they are working in has asbestos containing materials present.
- 3.4. WCHG will support customers who live in homes with asbestos containing material, including regular information updates, and re-location where high impact intrusive work is required. This includes taking account of all individual needs and making reasonable adjustments when required.
- 3.5. The annual business planning process will consider resources required to effectively deliver this policy and make available financial and colleague resources to deliver these policy commitments.
- 3.6. WCHG will procure qualified and competent consultants to undertake all asbestos surveys and all removal works will be completed by Licensed Asbestos Removal Contractors (LARC). Acceptance and review of all contractors will be undertaken in line with the requirement of the WCHG Procurement Strategy.

- 3.7. WCHG will provide asbestos training in line with its job compliance training matrix. This will include the P405 Qualification for cohort of colleagues involved with asbestos management. Formal awareness training will be delivered to all front line colleagues every three years and supported by an annual refresher e-learning package.
- 3.8. WCHG will adhere to and update as required, the supporting procedures and processes, outlining specific roles and responsibilities that are in place to support delivery of this policy.
- 3.9. WCHG will ensure compliance with all Reporting of Incidents. Diseases and Dangerous Occurrences Regulations (RIDDOR) relating to asbestos management.
- 3.10. WCHG will maintain records of any colleague who is exposed to levels of asbestos above the Control Limit set out in the Control of Asbestos Regulations 2012. Any affected colleague must notify their GP so personal medical records can be updated.

### 4. Equality Diversity and Inclusion

- 4.1. WCHG will ensure that the Asbestos Management Policy and procedure is accessible to it all customers. WCHG recognises that customers of all races, ages, religions, gender, sexual orientation, literacy levels and disability should be treated equally and fairly. We will make every reasonable effort to ensure that no-one is discriminated against directly or indirectly on the basis of any protected characteristic as defined by the Equality Act 2010. We recognise that some protected groups may be disproportionately impacted and will take additional steps in the application of this policy and make reasonable adjustments to ensure compliance with the Act.
- 4.2. A screening document for this policy has been completed and reviewed by the Equality Impact Assessment (EIA) Panel. Following this review, a full EIA was not found to necessary.

### 5. Complaints

5.1. Customers who are dissatisfied with the asbestos management services they receive from WCHG can use the Complaints Comments and Praise service to make their complaint.

#### 6. Monitoring and Review

- 6.1. The supporting procedure and process for the delivery asbestos management, includes the robust monitoring of operational activity, roles and responsibilities.
- 6.2. Compliance assurance reporting in respect of asbestos management is routinely provided to the Leadership team and Board. The internal audit plan will periodically review asbestos management for Committee assurance.
- 6.3. The Great places Panel will regularly monitor, review and help develop this policy.

6.4. This policy will be reviewed every three years, and updated in line with any changes to regulation or legislation as required.