



**Title:** Asbestos - Sanctuary Procedure

**Business Function:** All Functions across Sanctuary

**Authors:** Group Health and Safety

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## General Information

### 1. Objective of this procedure

1.1 This procedure supports Sanctuary [Health and Safety - Sanctuary Policy](#) as it relates to the management of asbestos.

1.2 Sanctuary has a duty to manage asbestos in all non-domestic properties and the common parts of domestic premises (detailed in **Appendix 1**) and will ensure, so far as is reasonably practicable that:

- the presence of Asbestos Containing Material (ACM) will be managed where Sanctuary is the duty holder as required by Regulation 4 of the Control of Asbestos Regulations 2012 (CAR 12);
- where ACM is identified in non-domestic properties and the common parts of domestic properties, the amount, location and condition will be assessed and recorded;
- in any Sanctuary property where work is being carried out that may disturb ACM, it will be identified prior to work commencing;
- the risk of exposure of any person to material known or assumed to contain asbestos will be assessed;
- identified ACM will be maintained in a good state of repair. Based on the assessed risk of exposure, the materials will be repaired and protected as necessary or, if exposure cannot be adequately prevented, the materials will be removed under safe systems of work;
- in all properties where Sanctuary is responsible, as defined in CAR 12, only accredited asbestos surveyors will carry out asbestos surveys (the type and extent of which will be as specified in CAR12);
- for all properties where Sanctuary is responsible, accredited licensed contractors will be used where removal of ACM is required;
- remedial work that may disturb any ACM may be undertaken by either accredited licensed contractors or where works are classed as low risk unlicensed works by appropriately trained Sanctuary Property Services operatives. Details of current surveying and removal contractors are available via the Procurement pages on [Solis](#);
- the risk of exposure during any work to repair or protect ACM, or work that may disturb ACM, will be competently assessed in order that exposure is prevented;
- records of all materials known or assumed to contain asbestos will be updated when additional information is available and will be accessible to anyone who is liable to work on or otherwise disturb the material; and
- no new or replacement materials, plant or equipment which contain asbestos will be used.

1.3 Sanctuary has a duty to ensure employees and others are not exposed to asbestos as the result of work activities, and will ensure this by:

- making a suitable and sufficient assessment of the risk created by exposure in advance of any planned works liable to disturb ACM;
- making a record of this risk assessment and communicating the contents to employees and others who may be affected such as contractors; and

- implementing the recommendations within the risk assessments including the use of control measures, personal protective equipment and measures to take in the event of accidental release of asbestos fibres.

## 2. Legislative/Regulatory context

- [Health and Safety at Work etc. Act 1974](#) (HASAWA 1974)
- [The Management of Health and Safety at Work Regulations 1999](#) (MHSAWR 1999)
- [The Control of Asbestos Regulations 2012](#) (CAR 12)
- [The Hazardous Waste \(Miscellaneous Amendments\) Regulations 2015](#)
- [The Special Waste Amendment \(Scotland\) Regulations 2004](#)
- [The Construction \(Design and Management\) Regulations 2015](#) (CDM 2015)

- 2.1 The HASAWA 1974 requires all employers to ensure, so far as is reasonably practicable, the health, safety and welfare at work of all their employees and others who may be affected by their work activities and environment.
- 2.2 The MHSAWR 1999 specify in more detail the general duties of HASAWA 1974, with regards to safety management requiring all employers to undertake a 'suitable and sufficient' assessment of the risks to the health and safety of their employees and others who may be affected by their work activities and environment. This includes the risks arising from working with asbestos.
- 2.3 The CAR 12 are designed to make sure anyone who carries out any work in a premise, does not expose themselves or others to asbestos from ACM that may be present. This is achieved by surveying premises for ACM prior to work taking place and assessing the risk of exposure from any material identified.
- 2.4 Asbestos is a hazardous substance and any contractors employed by Sanctuary to transfer or dispose of asbestos waste are required to comply with the Hazardous Waste (England and Wales) Regulations 2012.
- 2.5 A core aim of the CDM 2015 is to identify hazards early on, so they can be eliminated or reduced at the design or planning stage, any remaining risks can be properly managed. These hazards must include any exposure to asbestos.
- 2.6 Asbestos has fire retardant properties and because of this many ACM were installed to provide fire protection. When ACM originally installed for this purpose are removed, then the fire protection for the building must be maintained to an equal or higher standard.

## 3. Responsibilities for implementation

### 3.1 Group Board/Group Chief Executive - Duty Holder

- 3.1.1 The Group Board and the Group Chief Executive are the Duty Holders with responsibility to ensure that procedures are followed within Sanctuary and managed appropriately.

### 3.2 Group Director - Corporate Services - Designated Responsibility

3.2.1 The Group Director - Corporate Services has delegated responsibility on behalf of the Group Board and Chief Executive to ensure that this procedure is followed so that Sanctuary is compliant with legislative and regulatory requirements relating to the control of asbestos.

### 3.3 Group Director - Housing

3.3.1 The key responsibilities of the Group Director - Housing in relation to asbestos are:

- to ensure adequate resources in terms of people, finance and planning are in place to enable compliance with legislative and statutory requirements relating to the control of asbestos; and
- to provide the details of high-risk activities or significant risks relating to asbestos to the Executive Committee and Group Board

### 3.4 Operations Director - Property Services

3.4.1 The role of the Operations Director - Property Services is to:

- ensure that the assessment of risk related to ACM within Sanctuary's property portfolio is completed and managed appropriately;
- retain overall responsibility for ensuring that asbestos surveys are compliant with the Health and Safety Executive's (HSE) guidance document 'HSG 264 Asbestos: The Survey Guide' and the Asbestos Register in compliance with regulation 4 of CAR 12;
- ensure that contracts are in place and reviewed as necessary to enable Sanctuary to comply with legislative and regulatory requirements relating to the control of asbestos;
- ensure that asbestos records are maintained and are up to date; and
- regularly report on asbestos compliance to the Group Head of Health and Safety.

### 3.5 Development Project Managers undertaking demolition of buildings for re-development

3.5.1 The Project Manager undertaking demolition of a building for re-development is the Responsible Person (RP) for the demolition site and has the responsibility to:

- familiarise themselves with this procedure and asbestos management processes and ensure that the procedure and guidelines are followed;
- attend suitable asbestos awareness training in order to ensure that they are aware of their responsibility under this procedure to reduce the risk of exposure to asbestos during the works;
- ensure that prior to any work commencing, all ACM likely to be disturbed or damaged is identified through a demolition asbestos survey by a Licensed Asbestos Framework Contractor;

- ensure that demolition contractors acting as the Principal Contractor (PC) for the demolition works are given access to the survey detailing ACM present in the premises which may be disturbed by the contractor's planned work;
- ensure that the demolition PC will only use accredited licensed contractors for removal of all identified ACM, and that this is undertaken prior to demolition; and
- ensure that following the removal of the ACM, that the demolition PC employs a UKAS accredited analyst independent of the asbestos removal contractor to confirm that ACMs have been removed.

### 3.6 All managers of planned works

3.6.1 It is the responsibility of all managers of planned works to familiarise themselves with this procedure and asbestos management process and ensure that the procedure and guidelines are followed. The manager of planned works is responsible for ensuring:

- that there is a person designated as a RP for each site where ACM may be disturbed; and
- that each RP has attended asbestos awareness training and is aware of their responsibilities to reduce the risk of exposure to asbestos during the works.

### 3.7 RP for planned works

3.7.1 The RP will ensure all contractors (internal or external) are given access to the data on ACM present in premises, that may be disturbed by the contractors' planned work, and made aware that should suspect materials be uncovered the relevant RP must be informed as a matter of urgency.

3.7.2 The RP is responsible for ensuring:

- that prior to any work commencing, all ACM likely to be disturbed or damaged is identified through risk assessment or appropriate asbestos survey;
- that only Licensed Asbestos Framework Contractors are used for surveying and removal of ACM;
- that appropriate actions and safe systems of work are implemented following the results from the risk assessment and or appropriate asbestos survey;
- that the following documentation has been received from the Licensed Asbestos Framework Contractors when remedial works or removal is to be completed:
  - Risk Assessment and Method Statement;
  - notification of works;
  - site supervision records;
  - any work-related permits; and
  - works specification.

- that remedial work which may disturb any ACM is undertaken by either accredited licensed contractors or where works are classed as low risk unlicensed works by appropriately trained Sanctuary Property Services Operatives;
- the reporting to their line manager, of, any safety hazard or defect relating to ACM which they suspect or consider may endanger the safety of themselves or any other person;
- that asbestos surveys and any other relevant information is made available to any person carrying out planned work;
- that they have copies of all the regulatory documentation related to the asbestos works, which will have been sent to the National Compliance team (NCT) by the Licensed Asbestos Framework Contractors such documentation is:
  - asbestos surveys;
  - bulk certificates of sampling;
  - evidence of encapsulating, repair or removal of ACM;
  - air monitoring strategy and reports, and specifically the Certificate of Re-Occupation with Four Stage Clearance documentation (if relevant);
  - waste consignment notes; and
  - asbestos re-inspection documents.

### 3.8 All managers of responsive works

3.8.1 It is the responsibility of all managers of responsive works to familiarise themselves with this procedure and asbestos management process and ensure that the procedure and guidelines are followed. The manager of responsive works is responsible for ensuring:

- that each Operative, whether an internal or external contractor, has attended asbestos awareness training and is aware of their responsibilities to reduce the risk of exposure to asbestos during the works; and
- that information relating to any known asbestos within the property is available and communicated prior to work commencing.

### 3.9 Property Services Operative

3.9.1 The Property Services Operative once at site becomes the RP and must apply risk assessment in line with asbestos awareness training received, to reduce the risk of exposure to asbestos during the works. If suspect materials are uncovered, the Operative must stop work immediately and contact their line manager.

3.10 Group Head of Health and Safety has the responsibility to:

- support the NCT and other staff, in the management of ACM within Sanctuary premises, by providing advice when required to do so; and
- regularly review the content of this procedure and applicable legislation.

3.11 Operations Health and Safety teams are responsible for:

- audit and review of the asbestos management processes in their business area;
- investigation of instances of accidental disturbance of ACM, which will be forwarded to Corporate Risk and Insurance;
- coordinating the response to any Asbestos Incident within their business area in liaison, with the Licensed Asbestos Framework Contractor; and
- Construction and Development Team - Development and delivery of Asbestos awareness training to their business areas operational staff

3.12 Head of HR Services has the responsibility to:

- appoint and manage an Occupational Health contractor to provide health surveillance services and advice in relation to exposure to asbestos;
- support managers in ensuring that a programme of health surveillance is in place when risk assessment determines the need; and
- support managers in implementing recommendations arising from health surveillance and referrals.

3.13 The Group Head of Learning and Development has the responsibilities to:

- source and then manage contracts for the provision of suitable and sufficient asbestos awareness and management training in consultation with the Group Head of Health and Safety; and
- ensure that all training records are held and maintained by the Learning Academy.

3.14 The Group Head of Procurement has the responsibilities to:

- ensure that the Licensed Asbestos Framework Contractors appointed by Sanctuary to complete surveys, sampling, encapsulation and removal works have submitted evidence of the required qualifications, certificates and training;
- ensure that all the required documentation such as risk assessments, method statements have been provided as part of the selection and approval process;
- ensuring that approved contractors have received asbestos training commensurate with their job roles and are competent; and
- ensure that all approved contractors have a copy of this procedure.

3.15 Managers with responsibility for contractors

3.15.1 Managers with responsibility for contractors have delegated responsibility for ensuring compliance with this procedure. This includes:

- ensuring only approved contractors are used;
- ensuring that the activity has been risk assessed, properly planned and will be carried out safely without risk to the contractors, Sanctuary employees or any other relevant person;
- ensuring that the contractors are aware of any ACM in the workplace that may affect them and any site rules that apply;

- ensuring that contractors are aware that should suspect ACM be disturbed, the RP must be contacted as a matter of urgency and incident control procedures, as shown in Detailed Procedures point 9 followed;
- monitoring the work regularly throughout the course of the contract, to ensure that the contractors are working to their method statement; and
- checking the area on completion of the work, to ensure that all work has been completed satisfactorily and the area is free from hazards or obstructions.

### 3.16 Contractors

3.16.1 Only approved framework contractors will be used, they are responsible for:

- compliance with and understanding of this procedure and asbestos management process;
- ensuring that they respond to and maintain all communication with the RP;
- ensuring that all operatives and sub-contractors are informed of the Sanctuary procedure and asbestos management process, the location of ACM within the project area and that safe systems of work are in place;
- co-operating with Licensed Asbestos Framework Contractors working within or adjacent to the known or intended project area;
- ensuring that all operatives have received asbestos awareness training;
- ensuring that emergency procedures are in place for any suspected or known exposure to ACM and that these are in line with the Sanctuary procedure; and
- ensuring that, prior to commencing work, they are in possession of an appropriate asbestos survey from the RP.

## 4. What's new - What's different?

4.1 December 2021 - Formal review. No changes at this time; however, this procedure has been identified as requiring a fundamental review, commencing in January 2022, with a target completion date of 31 March 2022.

## 5. Definitions

5.1 The following definitions support the reader's understanding of this procedure:

<b>Asbestos</b>	A naturally occurring mineral. The three main types still found in premises are commonly called: <ul style="list-style-type: none"> <li>• 'blue asbestos' (crocidolite).</li> <li>• 'brown asbestos' (amosite); and</li> <li>• 'white asbestos' (chrysotile).</li> </ul>
<b>Asbestos Containing Materials (ACM)</b>	Any material which includes asbestos. For example, textured decorative coatings such as Artex, asbestos insulating board (AIB), pre-formed pipe insulation, lagging, floor tiles, asbestos cement products, rope seals and gaskets

<b><i>Asbestos Management Plan</i></b>	A document which sets out the detail of how the Asbestos known or assumed to be present at a specific premise is going to be managed.
<b><i>Asbestos Management Process</i></b>	The Asbestos management process sets out how Sanctuary will identify and manage the risks from ACM within its portfolio and provides details on how actions undertaken should be planned and records kept.
<b><i>Asbestos Register</i></b>	A log of the data collected for Sanctuary's existing stock, identifying the potential for the presence of asbestos and ACM and the actions taken to mitigate risk.
<b><i>Common Parts of domestic properties</i></b>	The common parts of multi occupancy domestic premises, such as purpose-built flats or houses converted into flats, might include foyers, corridors, lifts and lift shafts, staircases, roof spaces, gardens, yards, outhouses, and garages; but not private domestic areas inside each flat.
<b><i>Encapsulation</i></b>	The application of an impervious material, which is secured over or around the ACM.
<b><i>Licensed Asbestos Framework Contractors (LAFC)</i></b>	<p>Licensed Asbestos Framework Contractors are those that have successfully completed the procurement process to become approved contractors for Sanctuary. The procurement process includes submission of the required qualifications, certificates and training.</p> <p>For the purposes of this document the term LAFC includes both companies licenced by the HSE to undertake asbestos removal work and those licenced to undertake asbestos surveys.</p> <p>For clarity the company undertaking asbestos removal works should be independent of the asbestos survey provider on the same job.</p>
<b><i>Management Survey</i></b>	The purpose of the management survey is to manage asbestos and ACM during the normal occupation and use of premises. The survey aims to ensure that asbestos and ACM in the premises or equipment are identified, and their condition recorded, and that asbestos and ACM remain undisturbed and inspected. Samples of asbestos and ACM are collected as part of the process and analysed to confirm the suspected presence of asbestos. The condition of the ACM is established by means of a materials assessment.
<b><i>Non-domestic Property</i></b>	Industrial and commercial buildings such as offices and shops, public buildings (such as leisure complexes) and the common parts of multi-occupancy domestic buildings, such as purpose-built flats or houses converted into flats.

<b><i>Refurbishment and Demolition Survey</i></b>	This type of survey is designed to be used as a basis for assessing asbestos and ACM before demolition or major refurbishment of premises.
<b><i>Responsible Person (RP)</i></b>	The RP is defined as a person designated for each site where works are to take place, who is responsible for ensuring that all contractors (internal or external) are given access to data on ACM present or suspected which could be disturbed by those works. Also, responsible for ensuring that should suspect ACM be disturbed that said contractors are aware that the RP must be contacted as a matter of urgency and incident control procedures followed.
<b><i>UKAS</i></b>	The United Kingdom Accreditation Service is the national accreditation body appointed by government to assess and accredit organisations that provide services including certification, testing, inspection and calibration.

## Detailed Procedures

### 1. Asbestos Management process

- 1.1 Sanctuary complies with its duty to manage asbestos in all non-domestic properties and the common parts of domestic premises by the implementation and maintenance of an Asbestos Management Plan, by means of the process, embedded in this procedure.
- 1.2 The duty is described on the HSE website - <http://www.hse.gov.uk/asbestos/managing/write.htm>
- 1.3 This procedure sets out the process by which Sanctuary identifies and manages the risks from ACM within the properties under its control and provides details on how actions undertaken should be planned and records kept.
- 1.4 CAR 12 requires that when an assessment identifies asbestos is or is liable to be present in a property the duty holder (Sanctuary) must ensure that.
  - a determination of the risk from that asbestos is made;
  - a written plan identifying those parts of the premises concerned is prepared; and
  - the measures which are to be taken for managing the risk are specified in the written plan.
- 1.5 Details of the types of properties where Sanctuary has a duty to manage asbestos are contained in **Appendix 1**.

### 2. Determining the presence of Asbestos Containing Materials

- 2.1 Sanctuary maintains a planned programme of asbestos surveys and re-inspections of properties under its control including:
  - assessment of whether non-domestic premises and common parts of domestic premises are liable to contain asbestos, its location and condition. Until surveys have been completed it will be presumed that asbestos is present and managed accordingly; and
  - assessment of risk from any confirmed (or assumed) ACM to identify its condition, and to arrange for repair and/or protection or, where necessary, its removal.
- 2.2 Asbestos surveys
  - 2.2.1 There are two different types of survey:
    - **Management Surveys**

Will be required where premises have a construction date of pre-2000 and there is no existing asbestos survey. The scope and extent of the survey will be determined and raised directly with the Licensed Asbestos Framework Contractor by the NCT as show in **Appendix 2** - Figure 1.

- **Refurbishment and Demolition Surveys**

Will be required for premises constructed pre-2000 where any of the following is undertaken, that has the potential to disturb ACM, and a check of the existing asbestos register indicates that an adequate management survey does not exist:

- planned refurbishment works involving the modification of structures or services such as kitchen renewals, replacement bathrooms, heating system renewals, and rewiring;
- maintenance work; or
- demolition.

Prior to the commencement of any works, the RP for delivery will request a survey, ensuring the targeted areas for the works are detailed on the works order. The survey will be undertaken by the Licensed Asbestos Framework Contractors.

2.2.2 A summary of this process is shown in **Appendix 2** - Figure 2.

2.2.3 All surveys will be carried out to the standard detailed in the current HSE guidance document HSG 264: Asbestos-The Survey Guide (<http://www.hse.gov.uk/pUbns/priced/hsg264.pdf>).

2.2.4 Further guidance can be found in [HSE Advisory note on the refurbishment of housing stock likely to contain asbestos](#).

2.2.5 Surveys are received by Sanctuary as follows:

- in PDF form; and
- in excel form as a data upload sheet, containing extracts from the survey document for uploading onto the Asbestos Register.

2.2.6 Surveys which were not requested through NCT are sent by the Licensed Asbestos Framework Contractor directly to the RP who requested the survey, and copied into the NCT general inbox ([nationalcompliance.team@sanctuary-housing.co.uk](mailto:nationalcompliance.team@sanctuary-housing.co.uk)), upon receipt NCT will ensure the Asbestos Register is updated.

2.3 Emergency works and high-risk actions

2.3.1 Following a survey or sampling the Licensed Asbestos Framework Contractor may identify emergency works or high-risk actions that need to be completed in a specified timeframe for example: on the same day. This requirement is flagged as urgent and emailed to both the NCT and Customer Service Centre (CSC) Request's inbox.

2.3.2 The process flow charts for Emergency works and high-risk actions can be found at **Appendix 2** - Figure 3.

### 3. Asbestos Register

- 3.1 The Asbestos Register is maintained by the NCT. Copies of all surveys and re-inspection reports containing information on the location, nature, condition, and recommended management options of any identified or suspected ACM are sent to NCT for transferring to the database, together with a link to the electronic copy of the survey.
- 3.2 Information where a survey has been carried out, but no ACMs were detected is also included on the Asbestos Register.
- 3.3 The assumption must be that ACMs are present in all areas not surveyed or which would not have fallen within the scope of the original survey/inspection.
- 3.4 Use of the Asbestos Register
- 3.4.1 Access to a read-only version of the Asbestos Register on Sanctuary's intranet system 'SOLIS', is available to all personnel and accessed using the following link: <https://solis/SG/assets/reinvestment/Pages/keystone-database.aspx>.
- 3.4.2 Enter the Unique Property Reference Number (UPRN), address or postcode:
- click 'search';
  - highlight the property to view and click 'select'; and
  - on the next screen, open the 'Asbestos' tab to access the Asbestos register.

### 4. Assessing the risk of Asbestos Containing Materials and management of Asbestos options

- 4.1 Following a survey or re-inspection, an assessment is completed using the procedure outlined in [HSG227](#), to determine priorities regarding management of ACM, which will be assessed on two criteria:

- **Material Assessment** - assessing the condition of the ACM and the ease to which it will release fibres if disturbed.
- **Priority Assessment** - assessing the likelihood of disturbance.
  - The assessment will give a resultant risk to which the time scales for completion of remedial action will be assigned as below:

Risk Level	Remediation timescale
High	3 months
Medium	12 months
Low	24 months
Very low	36 months

- The assessment information is added to the Asbestos Register and forms the basis of planning for how the identified or suspected ACM will be managed.

## 4.2 Cloning Asbestos information

### 4.2.1 Asbestos assessments for premises, indicating typical asbestos material locations, can be cloned in the following circumstance **only**:

- The premises that the cloned assessment data is to be applied to, is of the exact same construction, age and condition as the assessed premises (for example, terraced houses of the same construction phase or flats within the same block);
- Where ACM is confirmed, it can be assumed that similar material, in a similar property, will also be ACM; and
- However, where ACM is not found in a property, it cannot be automatically assumed that it does not exist in a similar property also.

### 4.2.2 Where information is cloned NCT must be informed to ensure the Asbestos Register is updated to include cloning details. Where there is any doubt as to the viability of cloning NCT must be contacted for advice.

## 4.3 Management of Asbestos options

### 4.3.1 Once the assessment has been completed the management of ACM is prioritized, recorded and implemented. The available management options are recommended by the Licensed Asbestos Framework Surveyor and recorded on the respective survey or re-inspection report.

### 4.3.2 Management options are selected from the following:

- **Manage in Situ** - ACMs which are in good condition, sealed and/or repaired, and are unlikely to be disturbed, may be left in place. If they are left in place, the condition of the ACMs must be monitored regularly by re-inspection and the results recorded.
- **Encapsulation** - There are two types of encapsulation:
  - bridging encapsulation which forms a durable layer adhering to the surface of the ACM; and
  - penetrating encapsulation which is designed to penetrate the ACM before hardening and locking the material together to give the ACM additional strength.
- **Removal** - Where it is not practical to repair or encapsulate the ACMs, they will need to be removed.

### 4.3.3 The process flow chart for Management Options can be found in **Appendix 2** - Figure 4.

## 4.4 Property re-inspections

### 4.4.1 All non-domestic and common parts of domestic properties with an existing Asbestos Management Survey that specifies ACM is to be managed in situ are re-inspected annually.

### 4.4.2 The NCT is responsible for ensuring that properties are re-inspected within the specified timeframes by the Licensed Asbestos Framework Contractors.

4.4.3 Any recommendations within the re-inspection will be based on the current condition of the known ACM and include a relevant material and priority assessment score.

## 5. Remedial works

5.1 Only Licensed Asbestos Framework Contractors holding a current licence from the Health and Safety Executive are employed to carry out asbestos works, such as removal or encapsulation based upon the recommendations from the Licensed Asbestos Framework surveyor. The terms of any contract include a requirement to carry out the work in accordance with all appropriate regulations and site-specific requirements.

5.2 Details of the current Licensed Asbestos Framework Contractors for Sanctuary can be obtained via the Procurement pages on [Solis](#).

5.3 Non-licensed remedial works, carried out by Sanctuary Property Services operatives, will be completed as per the requirements of the Sanctuary Property Services Management System, incorporating risk assessment, safe systems of work, toolbox talks and Asbestos Awareness training.

5.4 The Sanctuary Generic Risk Assessment - Exposure to ACM can be found at **Appendix 3**.

## 6. Managing asbestos information and transfer of data

6.1 It is essential that all information and records regarding asbestos are maintained, updated and shared.

6.2 When a works order is issued all relevant information regarding any confirmed or assumed asbestos, is added.

6.3 For works commissioned outside of the Customer Services Centre the RP for the works must review the Asbestos Register to ensure that an Asbestos Risk Assessment is undertaken before commencing work. This includes a targeted Refurbishment and Demolition Survey if necessary.

6.4 Dissemination of information

6.4.1 When a works order is received, it must be checked for the information on ACMs in the premises. If no ACMs are present, then work can progress as normal. Where no information is available, ACM's must be assumed to be present in a building constructed before 2000.

6.4.2 Where ACMs are present or assumed to be present the Contractor/Operative is required to make a dynamic risk assessment based on training received in order to identify if the works are likely to disturb those ACM materials.

- 6.4.3 If the dynamic assessment concludes that no ACM's will be disturbed, then the work can progress with caution. However, if the assessment concludes that ACM's may be disturbed the RP must be informed. The RP must contact the relevant Licensed Asbestos Framework Contractor who will advise on the correct course of action to be taken.
- 6.4.4 The process flow chart can be found in **Appendix 2** - Figure 5.
- 6.5 Contractors engaged in construction works including refurbishment and demolition
- 6.5.1 At the pre-construction phase or planning stage, and before any works commence, the RP must check for the presence of ACMs in the premises against the Asbestos Register.
- 6.5.2 If no ACMs are present, then work can progress as normal.
- 6.5.3 Where no information is available, then ACM's must be assumed to be present in a building constructed prior to 2000 and before any works can commence, a targeted refurbishment and demolition survey must be requested by the RP, from the Licensed Asbestos Framework Contractor.
- 6.5.4 Where ACMs are present the RP must provide the survey to the refurbishment/demolition contractor. In circumstances where only partial demolition will take place and not the entire building then the refurbishment/demolition contractor must confirm whether ACM's will be disturbed during their planned works. If the assessment concludes that no ACMs will be disturbed, then the work can proceed.
- 6.5.5 However, if the contractor concludes that ACMs will be disturbed then the RP must arrange remedial works through the Licensed Asbestos Framework Contractor. The remedial works must take place before any contractor works commence in order to prevent the contractor's workers from being exposed to ACM's. This applies unless the building is to be demolished prior to re-development of the site. (See Section 10 – Demolition of Buildings).
- 6.5.6 The asbestos register details for non-domestic premises and domestic premises with common parts must be displayed on the notice board or in the signing in book on site, with a second copy being placed in the black folder in the red box at the scheme. The survey must be viewed by contractors attending premises prior to any commencement of work.
- 6.5.7 Where Sanctuary staff members are based in premises, they must ensure that contractors confirm that they have read the survey and understand where ACM is present, by way of signing the Contractor confirmation of viewing the Asbestos Register form, (**Appendix 4**).

6.5.8 Contractors are required to seek information concerning the possible presence of asbestos in premises in which they are due to work. They must report immediately any already identified asbestos materials found to be damaged or the suspected presence of additional asbestos materials identified during their work.

## 6.6 Sanctuary Care

6.6.1 The following documentation is to be displayed at the sites entrance:

- local health and safety procedures;
- contractors signing in and out sheets; and
- Asbestos Survey Executive Summary.

6.6.2 All staff must ensure that details of visiting contractors are logged on the Contractors Signing In and out sheets. This is so that the site is aware of all persons on-site and maintains a log of all visits to the premises as well as ensuring that all contractors have seen and understood the local health and safety procedures.

6.6.3 If the site does not have asbestos or the building was constructed after the year 2000, a No Asbestos Present Statement must be completed to evidence the fact.

## 6.7 Sanctuary Supported Living

6.7.1 The Contractors Health and Safety Notice must be displayed on the notice board or in the Signing in Book. The notice contains details of the Emergency Procedures and specific safety requirements that contractors must read and adhere to when entering the premises.

6.7.2 All staff must ensure that details of visiting contractors are logged on the Contractors Signing In/Out Form. This is so that the premises are aware of all persons on-site and maintains a log of all visits to the premises as well as ensuring that all contractors have seen and understood the Contractors Health and Safety Notice.

6.7.3 The Asbestos Survey Executive Summary must be displayed on notice board or in Signing in Book and must be provided to all contractors that may disturb asbestos during their work.

6.7.4 Contractor confirmation of viewing the Asbestos Register form, (**Appendix 4**), must be signed by all contractors who may disturb asbestos during their work.

## 6.8 Sanctuary Students

6.8.1 Asbestos Information is held at reception on student accommodation sites. The visitors/contractor's information provided on site, requires contractors to familiarise themselves with the location and condition of any asbestos on site.

6.8.2 Contractors are required to verify that they have read the Visitor/Contractor Information as part of the contractor signing in process.

## 6.9 The Emergency Services

6.9.1 The emergency services are to be given access to data on the most recent Asbestos Register for any Sanctuary premises they have need to enter.

## 6.10 For Enforcing Authorities

6.10.1 A copy of premises asbestos surveys must be provided on request. In an emergency, the NCT should be contacted, to provide the asbestos data for the premises being inspected, out of hours internal contractors will rely on the information provided by CSC through handheld devices.

## 6.11 General information for residents

6.11.1 Information for tenants is available via the [Sanctuary | Homepage](#) in the form of an Asbestos Guidance document, as part of the Safety in your Home information suite. The guidance contains information on what asbestos is, where it can potentially be found in properties and what to do if tenants think they may have asbestos in their home.

6.11.2 Information on the potential locations and hazards of asbestos is provided in the Repairs Handbook, which is available to all residents. This assists residents with understanding where asbestos can be found within properties and to consider the danger of asbestos before undertaking DIY works.

## 7. Safe working with Asbestos

7.1 Sanctuary complies with its duty to ensure employees and others are not exposed to asbestos as the result of work activities by:

7.2 All work with ACM will be undertaken in accordance with HSE Approved Code of Practice. This includes:

- completion of works by the Licensed Asbestos Framework Contractor;
- restriction of access to the work area for non-essential staff;
- ensuring that all workers in the area who may be exposed are suitably trained and protected; and
- decontaminating persons onsite so that they can be removed from the area, and secondly the de-contamination of the property.

7.3 Property Services Operatives must ensure that they have read, understood and abide by the Sanctuary Generic Risk Assessment - Exposure to ACM contained at **Appendix 3**.

## 8. Asbestos awareness training

- 8.1 All Sanctuary employees whose job role indicates that they may potentially encounter asbestos, or ACM must complete asbestos awareness training as defined within CAR 2012, Regulation 10.
- 8.2 Asbestos Awareness (and Refresher) for Operatives Course; this course is delivered by the Licensed Asbestos Framework Contractor. The workshop covers the most common types of asbestos and how to protect people from exposure and is aimed at all employees who may disturb or encounter ACMs. This course should be attended by all operatives as mandatory and must be completed as part of the induction of new maintenance employees. The course must be completed every two years for existing employees.
- 8.3 Development and Construction have developed suitable asbestos awareness training which has been devised and will be delivered by competent members of the Operational Health and Safety Team, who have completed the BOHS P405 Management of Asbestos in building course. The training is aimed at Development and Construction staff who may disturb or encounter ACMs and /or who are responsible for the demolition of existing buildings prior to the construction of new build housing.
- 8.4 Records must be retained by the Learning Academy. This information is accessible by line managers in order to ensure employees have completed the relevant training.
- 8.5 External contractors working within existing stock must be trained in the recognition of asbestos and ACMs. Training records should be available for inspection during monthly contractor meetings.

## 9. Incident control

- 9.1 All incidents of:
- discovered damage to material suspected of containing asbestos; or
  - disturbance of ACM as a result of works, must be reported to either the RP for planned works, line manager (becoming the RP) for responsive works or CSC as appropriate. All persons potentially exposed must remain onsite and emergency procedures followed.
- 9.1.1 The process flow chart for this can be found at **Appendix 2** - Figure 6.
- Note:** All works must be stopped immediately and not continued until the ACMs composition is known.
- 9.2 A targeted survey, emergency air test and a physical sample must be requested by the RP and undertaken by the Licensed Asbestos Framework Contractor. For advice and guidance on best measures the RP should contact the NCT.

- 9.3 The incident must be reported by the RP as soon as possible to the Health and Safety Accident Reporting Line by calling: 0800 916 1466 or directly onto the Radar system via the start menu icon for computer users, selecting the following:
- Type of new event - Untoward Event
  - Event Category - Accident
  - Accident Category - Property Damage
  - Property Damage Type - Release of Asbestos.
- 9.4 If it is confirmed that no asbestos is present, then work can continue. If air sampling confirms the release of asbestos fibres are in breach of the legal control limit this is now classed as an Asbestos Incident. The RP must immediately inform the relevant Service Manager, Health and Safety, and the NCT.
- 9.5 The Operational Health and Safety teams are responsible for co-ordinating the response to any Asbestos Incident within their business area and will be advised by the Licensed Asbestos Framework Contractor on the steps necessary; to firstly decontaminate persons on-site so that they can be removed from the area; and secondly the de-contamination of the property.

## 10. Demolition of Buildings

- 10.1 All demolition works are the responsibility of the Development Project team, which will appoint a Project Manager for the site to act as the RP.
- 10.2 The RP will arrange for a Demolition Survey to be undertaken by a Sanctuary asbestos framework contractor of any building constructed prior to 2000 and before any works can commence, in accordance with [Asbestos: The survey guide HSG264](#)
- 10.3 If the survey result indicates that no ACMs are present, then this information is passed to the demolition contractor to include in their Construction Phase Plan (CPP).

If the assessment concludes that ACMs are present within the building, then the following process applies:

- 10.3.1 The RP will appoint a Sanctuary approved demolition contractor as a PC responsible for the removal of the asbestos by a licenced contractor and the completion of the demolition works.
- 10.3.2 The demolition contractor will ensure that suitable risk assessments and method statements are provided for both the asbestos removal and subsequent demolition within the demolition CPP. The CPP will be provided by the demolition contractor to the appointed Principal Designer for prior review and assessment of adequacy before any works commence.

- 10.3.3 All asbestos removal contractors appointed by the demolition contractor will be licenced by the HSE for the type of removal being undertaken in accordance with CAR 2012.
- 10.3.4 The demolition contractor is responsible for ensuring that a UKAS accredited analyst is appointed who is independent of the removal contractor, to undertake suitable sampling to confirm that all asbestos ACM's have been removed prior to demolition taking place.
- 10.3.5 Where there is a planned delay between survey and demolition, the building must be secured and notices warning of the presence of asbestos affixed to access points. The condition of the building must be managed, so far as is reasonably practicable, to reduce the risk of exposure to ACM, without risk to others.
- 10.3.6 The RP will ensure access to the building is controlled and that any persons seeking entry is made aware of the presence of ACM and provided with the asbestos survey. Where the condition of the building is in a state of increasing dilapidation, likely to cause deterioration to known ACM, then the RP is responsible for commissioning further surveys to ensure that any remedial works are identified, to reduce, so far as is reasonably practicable, the risk of exposure to ACM.
- 10.3.7 On completion of the demolition all evidence obtained from asbestos sampling carried out by the analyst must be provided to the Project Manager and retained in the Health and Safety File.

## Supporting Information

### 1. Additional support and guidance

1.1 For further information and advice regarding asbestos please contact the Health and Safety Services team:

- Email: [healthandsafety@sanctuary-housing.co.uk](mailto:healthandsafety@sanctuary-housing.co.uk)
- CSC out of hours telephone 0800 916 1525

1.2 Other guidance documents:

- [Managing and working with asbestos. Control of Asbestos Regulations 2012. Approved Code of Practice and guidance.](#)
- Asbestos: The survey guide [HSG264](#).
- A comprehensive guide to Managing Asbestos in premises [HSG227](#).

### 2. Period of review

2.1 Until a new procedure is formally adopted this document will remain in force and operational

2.2 This procedure will be reviewed in accordance with the policy review programme agreed by Executive Committee.

2.3 If there are significant changes to legislation or regulation or there are found to be deficiencies or failures in this procedure, as a result of complaints or findings from any independent organisations, the Group Director - Corporate services/ Group Head of Health and Safety will initiate an immediate review.

2.4 Where appropriate, key stakeholders, customers and interested parties will be consulted as part of any review of this procedure.

### 3. Monitoring and compliance

3.1 The implementation of this procedure will be monitored and audited in line with the targets set for the maintenance of Certification to ISO 18001 (Occupational Health and Safety Management Systems - Requirements).