
Sanctuary Group

Title: Asbestos Management - Group Policy

Business Function: All Functions across Sanctuary Group

Author: Group Health and Safety

Other Contributors: Property Services - National Compliance
Construction and Development
Customer Service Centre Asbestos

Authorised by: Executive Committee

Sanctuary Group:
Sanctuary Group is a trading name of Sanctuary Housing Association,
an exempt charity, and all of its subsidiaries.

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Review Schedule

Date	Details
July 2024	<p>Formal review - with following changes made:</p> <p>Policy:</p> <ul style="list-style-type: none"> • Minor text and format changes to aid readers understanding. • Commencement of version control following ISO45001 audit recommendations • CSC responsibilities - addition of uploading of information to Asbestos Register. • Director of Property Operations changed to Property Services • Head of HR title changed to Group Head of People Services • Link updated to Sanctuary Inclusion for All 2024/2026 <p>Appendix 2:</p> <ul style="list-style-type: none"> • Asbestos Management Plan, updated to V6. • Uploading of information to Asbestos Register now completed by CSC. <p>Appendix 3:</p> <ul style="list-style-type: none"> • Process charts updating to reflect the uploading of information to Asbestos Register by CSC. <p>Appendix 4 - Exposure to Asbestos Risk Assessment:</p> <ul style="list-style-type: none"> • Assessment presented on the new Group Generic Risk Assessment Form.

Appendices

Appendix 1 - Types of properties where Sanctuary Group has a duty to manage asbestos

Appendix 2 - Asbestos Management Plan

Appendix 3 - Asbestos Management Process Flow Charts

Appendix 4 - Generic Risk Assessment - Exposure to Asbestos Containing Material

Appendix 5 - Contractor confirmation of viewing the Asbestos Register form

Additional guidance

AG01 - Sanctuary Asbestos Framework Contractors

1. Policy statement

- 1.1 This policy supports Sanctuary Group (the Group's) [Health and Safety - Group Policy](#) as it relates to the management of asbestos.
- 1.2 The Group has a duty to manage asbestos in all non-domestic properties and the common parts of domestic premises; detailed in **Appendix 1**.
- 1.3 The Group 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 Asbestos Containing Material (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.
- 1.4 In situations where the Group rents, leases, or has contracts which give shared responsibilities, the Group has a duty to co-operate with other occupiers. All parties should make whatever parts of the building they are responsible for available to one another, enabling the duty holder to carry out their responsibilities. Non-duty holders who have information regarding to or control of a premise must help the duty holder to comply with the duty.

2. Roles and responsibilities

- 2.1 The [Health and Safety - Group Policy](#) details the Health and Safety responsibilities for roles with a significant impact on health and safety.
- 2.2 In addition to those responsibilities, some roles may have specific responsibilities in relation to the management of asbestos, as detailed below and in business area operational procedures and processes for example Operational Directors.
- 2.3 Group Chief Executive - is the Corporate Duty holder with responsibility to ensure this policy and business area operational procedures and processes are followed and appropriately managed.
- 2.4 Group Board - as [Health and Safety - Group Policy](#)
- 2.5 The Executive Director - Corporate Services has delegated responsibility on behalf of the Group Chief Executive, to raise significant asbestos management issues with the Executive Committee, and to ensure that.
 - this policy is in place and up to date and competent advice on its implementation is available across the Group;
 - the Group is compliant with legislative/regulatory requirements relating to the control of asbestos Including:

- ensuring asbestos compliance appears as an important topic on Board agendas.
- that there are sufficient resources in place to ensure the Group's asbestos management procedures can be effective; and
- giving assurance to Group Board that the control of asbestos safety is being managed throughout the Group.

2.6 Chief Customer Officer

2.7.1 The key responsibilities of the Chief Customer Officer 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 Executive and Group Board

2.7 Director of Property Services

2.7.1 Director of Property Services has responsibility to:

- ensure that the assessment of risk related to ACM within the Group'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's) 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 the Group 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 Executive, Group Board, and the Group Head of Health and Safety

2.8 National Compliance team (NCT)

2.8.1 The Asbestos team within the NCT is responsible for the following in respect of non-domestic properties and the common parts of domestic premises.

- liaison with the appointed contractors, operational roles, and Group Health and Safety Services.
- monitoring the activities and performance of the appointed contractors.
- ensuring that Asbestos Surveys and re-inspections are completed for identified properties.
- recording, reviewing, and monitoring the significant findings and any actions arising from Asbestos Surveys and re-inspection surveys.
- ensuring that all actions identified are undertaken within an appropriate timescale and that necessary remedial works are completed.
- ensuring appropriate documents, including Asbestos Surveys and re-inspections are uploaded to the SharePoint Compliance Certificate Portal for operational roles to access.
- maintenance of the Asbestos Register and associated SAP records; and

- ensuring newly acquired stock or new builds have the appropriate risk assessments in place and providing expert oversight during due diligence periods.

2.9 Development project managers undertaking demolition of buildings for re-development.

2.9.1 The Project Manager undertaking demolition of a building for re-development is the Responsible Person 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 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.

2.10 All managers of planned works

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

- that there is a person designated as a Responsible Person (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.

2.11 RP for planned works

2.11.1 The RP will ensure all contractors (internal or external) are given access to the data on ACM present in premises, which 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.

2.11.2 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, whether classified as licensed or non-licensed work is undertaken by accredited licensed framework contractors only.
- 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.
- 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 NCT, Managers of Works, or Customer Service Centre (CSC) Asbestos, as appropriate, 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.

2.12 All managers of responsive works

2.12.1 It is the responsibility of all managers of responsive works to familiarise themselves with this policy and asbestos management process and ensure that the procedures 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.

2.13 Property Services Operative

2.13.1 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.

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

- support the NCT and other staff, in the management of ACM within The Group's premises, by providing professional guidance and support to all business operations when required to do so; and
- regularly review the content of this procedure and applicable legislation.

2.15 Operations Health and Safety teams are responsible for:

- investigation of instances of accidental disturbance of ACM, in liaison with external agencies and RIDDOR reporting for any Asbestos related incidents, as required.
- providing advice and support to their operational areas of the Group in respect of Asbestos management as requested, and when issues are identified during Health and Safety team audit visits and inspections; and
- Construction and Development team - Development and delivery of Asbestos awareness training to their business areas operational staff.

2.16 Group Head of People Services has the responsibility to:

- appoint and manage an Occupational Health contractor to provide support and advice services in relation to exposure to asbestos.

2.17 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.

2.18 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 policy.

2.19 Managers with responsibility for premises

2.19.1 Managers with responsibility for premises have delegated responsibility for ensuring compliance with this policy and associated procedures. 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, Group 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 detailed in **Appendix 2 - Asbestos Management Plan** are 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.

2.20 Contractors

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

- ensuring that all operatives and sub-contractors are informed of, understand and comply with, the Group procedure and asbestos management process.
- ensuring that they respond to and maintain all communication with the RP.
- the location of ACM within the project area and that safe systems of work are in place.
- co-operating with other 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 Group procedure.
- ensuring that, prior to commencing work, they are in possession of an appropriate asbestos survey from the RP.
- maintenance of records in relation to risk assessment, remedial works, monitoring, and sampling.
- confirming completion of all such identified works/actions to the Operations Manager - Compliance.
- transfer or disposal of asbestos waste on the Group's behalf in compliance with the Hazardous Waste (England and Wales) Regulations; and
- ensuring newly acquired stock or new builds have in place appropriate risk assessments and providing expert oversight during due diligence periods.

2.21 All employees - in addition to responsibilities detailed in the [Health and Safety - Group Policy](#) employees are responsible for ensuring that:

- they adhere to both the Group and any business area specific requirements in relation to asbestos related procedures and processes.

2.22 CSC and CSC Asbestos team responsibilities in relation to domestic properties:

- All CSC repair staff are responsible for checking the asbestos survey status of buildings on SAP Property Explorer in response to asbestos related customer contact and for raising orders for initial asbestos surveys where required.
- CSC Asbestos are responsible for managing asbestos reports and extra works sent to the CSC mailbox by the Licensed Framework Surveyors and managing any associated removals and reinstatement works.
- Ensuring orders raised contain all the required information as detailed in the CSC processes.
- Completing updates to the Asbestos Register in line with Asbestos Process requirements.

3. References and sources

3.1 The Group recognises its responsibilities as a Duty Holder in relation to the Control of Asbestos under the following legislation:

- [Health and Safety at Work etc. Act 1974](#) (HASAWA 1974)
- [The Management of Health and Safety at Work Regulations 1999](#) (MHSWR 1999)
- [The Control of Asbestos Regulations 2012](#) (CAR 12)
- [The Hazardous Waste \(England and Wales\) Regulations 2005](#)
- [The Hazardous Waste \(Miscellaneous Amendments\) Regulations 2015](#)
- [The Special Waste Amendment \(Scotland\) Regulations 2004](#)
- [The Construction \(Design and Management\) Regulations 2015](#) (CDM 2015)

3.2 Summaries of the duties and responsibilities placed on Sanctuary by the above pieces of legislation are contained in the Health and Safety Legislation Risk Register, held on Pulse at [Health and Safety - Group Policy](#).

4. Application

4.1 In the execution of its duties under the legislation, the Group will ensure so far as is reasonably practicable that:

- Where the Group is the duty holder as required by Regulation 4 of the Control of Asbestos Regulations 2012 (CAR 12), the presence of Asbestos Containing Material (ACM) and its condition will be identified by the conducting of appropriate asbestos surveys and subsequently managed through the processes in the written management plan supported by the site-specific information on the Asbestos Register and associated database on SAP.

- In all properties where the Group 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).
- Appointed contractors will have their overall competence, comprising ability, experience, and training scrutinised as part of the Group's procurement contractor approval processes.
- Appropriate information, instruction and training will be provided to all employees, identified as requiring such on the operations training matrices.
- Further accredited training will be provided to several identified employees to ensure that there is subject matter knowledge and advice available within the business.
- 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.
- 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.
- The risk of exposure of any person to material known or assumed to contain asbestos will be assessed.
- Identified ACM will be further assessed to identify the material condition of the ACM and the likelihood of disturbance to determine the priorities for management of the ACM. Based on the assessed risk of exposure, the materials will be maintained in a good condition by either repair or protection as necessary or, if exposure cannot be adequately prevented, the materials will be removed under safe systems of work.
- All non-domestic and common parts of domestic properties with an existing Asbestos Management Survey that specifies ACM is to be managed in situ will be re-inspected. The timescale for re-inspection will be determined by the Licensed Asbestos Framework Surveyor using a risk-based approach dependent upon the findings of the survey.
- For all properties where the Group is responsible, accredited licensed contractors will be used where removal of ACM is required.
- In any Group property where work is being carried out that may disturb ACM, it will be identified prior to work commencing and such information regarding its nature and location made available to those persons undertaking the works.
- 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.
- Remedial work which may disturb any ACM, whether classified as licensed or non-licensed work is undertaken by accredited licensed framework contractors only. Details of the current contractors for The Group are contained in **AG01** - [Sanctuary Asbestos Framework Contractors](#).
- New or replacement materials, plant or equipment will be responsibly sourced to ensure that none which may potentially contain asbestos will be used.
- When ACM originally installed to provide fire protection is removed, the fire protection for the building will be maintained to an equal or higher standard.

- Emergency plans are in place for dealing with incidents of suspected asbestos release and that these plans include the provision of information regarding the presence of asbestos to the emergency services.
- Procedures and processes are in place to establish the presence of asbestos in premises where a release is suspected, and for subsequent decontamination and decant of persons from such premises where required.
- Contractors employed by the Group to transfer or dispose of asbestos waste on their behalf comply with the Hazardous Waste (England and Wales) Regulations.

5. Impact on diversity

- 5.1 The Group demonstrates its commitment to diversity and promoting equality by ensuring that this policy is applied in a manner that is fair to all sections of the community, with due regard to the protected characteristics identified under the [Equality Act 2010](#) and in accordance with the '[Sanctuary Inclusion for All Strategy 2024-2026](#)'.

6. Resident consultation

- 6.1 This policy is for internal use only and is in place to state the Group's approach to statutory requirements placed upon it; therefore, residents have not been consulted.

7. Monitoring and compliance

- 7.1 The implementation of this policy will be monitored and audited.

7.2 Period of review

- 7.2.1 Until a new policy is formally adopted this document will remain in force and operational.

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

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

8. Operational arrangements

- 8.1 This policy is to be read in conjunction with the business area operational procedures and processes and the following Group Procedures.

- [Personal Protective Equipment -Group Procedure](#)
- [Accident Reporting and Investigation - Group Procedure](#)
- [Hazardous Substances - Group Procedure](#)

9. Definitions

9.1 The following definitions support the user's understanding of the legislation and guidance.

Asbestos	A naturally occurring mineral. The three main types still found in premises are commonly called: <ul style="list-style-type: none"> • 'Blue asbestos' (crocidolite); • 'Brown asbestos' (amosite); and • 'White asbestos' (chrysotile).
Asbestos Containing Materials (ACM)	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
Asbestos Management Plan	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.
Asbestos Management Process	The Asbestos management process sets out how The Group will identify and manage the risks from ACM within its portfolio and provides details on how actions undertaken should be planned and records kept. Contained within Appendix 2 of this policy.
Asbestos Register	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.
Common Parts of domestic properties	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.
Contractors	Trades personnel carrying out works on behalf of The Group, Contractors may be external - employed by another employer, or internal - Sanctuary employees such as Property Services Operatives, Gas Engineers.
Encapsulation	The application of an impervious material, which is secured over or around the ACM.
Licensed Asbestos Framework Contractors (LAFC)	Licensed Asbestos Framework Contractors are those that have successfully completed the procurement process to become approved contractors for the Group. The procurement process includes submission of the required qualifications, certificates, and training. 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. For clarity, the company undertaking asbestos removal works should be independent of the asbestos survey provider on the same job/project.

Management Survey	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.
Non-domestic Property	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.
Refurbishment and Demolition Survey	This type of survey is designed to be used as a basis for assessing asbestos and ACM before demolition or major refurbishment of premises.
Responsible Person (RP)	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. Such persons will include Surveyors, Property Services Project Managers.
UKAS	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.