

Asbestos Management Policy

Scope of Policy

This policy sets out the minimum standards of asbestos management that Platform Housing Group (the Group) will adhere to. It covers arrangements for asbestos identification, management and removal in respect of all properties within the Group portfolio, over which we have direct responsibility and control.

The standards outlined in this policy are the minimum, which the Group will apply and cannot be reduced. They can, however, be enhanced where deemed reasonable and appropriate.

Applicability

The policy applies to all members of the Group.

1. Policy Statement

- 1.1 The Group will take all appropriate precautions to ensure the health and safety of its employees, and others, who may be affected by risks associated with possible Asbestos Containing Materials (ACMs) present in the buildings and plant owned or occupied by us. No persons will knowingly be exposed to airborne asbestos fibres in excess of prescribed exposure standards.

2. Context

- 2.1 Compliance with this policy will ensure the Group complies with:

- Health and Safety at Work etc. Act 1974
- Management of Health and Safety at Work Regulations 1999
- Control of Asbestos Regulations 2012
- Health & Safety Executive – Asbestos: The Survey Guide - HSG264
- Health & Safety Executive – Asbestos Essentials - HSG210
- Health & Safety Executive – Asbestos: The Analysts' Guide for sampling, analysis and clearance procedures - HSG248
- Health & Safety Executive – A comprehensive guide to managing asbestos in premises – HSG227
- Health & Safety Executive – Asbestos: The Licenced Contractors' Guide – HSG247
- Health and Safety Executive – Managing and working with asbestos – ACoP and Guidance L143
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)
- The Housing Act 2004, which introduced the Housing Health and Safety Rating System (HHSRS) and the Housing Health and Safety Rating System Regulations 2005
- The Construction Design and Management Regulations (2015)

- Regulator of Social Housing: Consumer Standards - Safety and Quality
- Social Housing (Regulation) Act 2023

Further information can be obtained from Health and Safety Executive – Asbestos Essentials.

3. Aims and Objectives

3.1 The aim of this policy is to ensure that:

- Practice and procedures will comply with the guidance contained within Health and Safety Executive (HSE) publication and the Control of Asbestos Regulations 2012.
- The Group Asbestos Register is up-to-date and made available to persons undertaking any works, prior to works being commenced. The register shall be maintained by undertaking surveys within our stock as required, ensuring that only Consultants who hold UKAS accreditation 17020 and 17025 for testing and inspection services are used.
- Any air monitoring or sampling required, is carried out via UKAS accredited specialists.
- Where asbestos is discovered, details of the location, type and condition will be provided to any persons undertaking any works, prior to that work commencing.
- Where asbestos is identified in communal areas, as defined in the Control of Asbestos Regulations 2012, the location, type and condition will be recorded on the Asbestos Register. The asbestos containing material will be re-inspected and re-assessed annually as a minimum, or more frequently if recommended by the survey actions. Management Plans and records will be updated accordingly, with any material being assessed as high risk being programmed for removal.
- Only approved HSE Licensed Asbestos Specialists will be used for any removal of licenced and notifiable non-licenced asbestos containing materials. For specific works deemed to be non-licenced, Platform may use internally trained, competent operatives to complete the works in accordance with agreed control and working methods.
- All employees who enter properties will have a basic awareness of asbestos and be informed of its location.
- Customers will be given suitable information about asbestos hazards in general, and where potential asbestos containing materials are commonly found in our domestic properties.
- Contractors will be given information regarding asbestos containing materials prior to any works being undertaken.
- Where someone is found to have been exposed to asbestos, they will receive ongoing health surveillance and monitoring by the Group and records will be kept for 40 years.

- Appoint persons with clear roles and responsibilities to manage the risks associated with asbestos containing materials (ACM).
- Prepare and disseminate an “Asbestos Management Plan” for the portfolio. The plan will clearly indicate how asbestos is to be managed within the stock, including the assumption that every property that was built post 2000 has no asbestos present in the building.
- Ensure that any unauthorised works to ACMs are brought to the attention of Platform so that they can be made safe, and investigations carried out to determine the cause and prevent future reoccurrence.

4. Policy Outline

- 4.1 Detailed procedures are in place to support the delivery of this policy and its objectives, and which deal with the circumstance of either suspected or actual release of asbestos fibres.
- 4.2 Asbestos, which is accidentally disturbed MUST be reported immediately through the accident/incident reporting procedure and to the individual’s line manager. The Health, Safety & Environment Team will also be informed, and an investigation commenced to ascertain the circumstances, including sampling of fibres to determine the content and whether an immediate environmental clearance is required.
- 4.3 If work within a property has started and asbestos, or suspected asbestos, has been discovered then all work must CEASE and reported immediately as 4.2 above. Upon leaving the area, the area must be made secure to prevent any unauthorised access and not be returned to until instruction has been given to do so.
- 4.4 Release of asbestos fibres resulting in exposure of personnel may be reportable to the HSE under Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR).
- 4.5 The Group will have in place an ongoing training programme for all relevant/applicable employees in asbestos awareness and safety at a level which is appropriate to meet the requirements of the Control of Asbestos Regulations 2012 and to ensure that potential risks are identified within the business.
- 4.6 The Group will ensure that Asbestos Management Plans, an Asbestos Register and required Asbestos Surveys and Reports are in place and kept up to date regularly. We will self-audit our systems regularly to ensure they are meeting the requirements of this policy and that our emergency response procedure is robust in the event that a suspected asbestos containing material is disturbed.

5. Information for Customers and their responsibilities

- 5.1 The Group will provide general information for customers, where necessary, regarding asbestos and the precautions which should be taken. Customers will be required to seek permission prior to carrying out any decorations in their property where they

have been informed of the possibility of asbestos containing materials being present in their home. Customers will be advised to contact the Group's Contact Centre to obtain guidance on any asbestos related issues.

- 5.2 The customer is responsible for immediately reporting any concerns with regards to the disturbance of any material that they may believe to contain asbestos so that Platform can investigate and action accordingly.

6. Group Responsibilities and Monitoring

- 6.1 The Group manages over 50,000 homes from the Derbyshire Dales in the north, to the Cotswolds in the south and from Herefordshire in the west to Lincolnshire in the east. Within this stock, there are also non-domestic locations including communal areas, offices, shops and garages. To ensure the management of asbestos containing material across the portfolio, in addition to this policy, the Group has developed comprehensive procedures and systems in relation to identification, management and removal of materials that may contain asbestos.
- 6.2 The Group is the "Responsible Person" under Health and Safety at Work etc. Act 1974. The Group Chief Executive emphasises the responsibility is acknowledged and lies at the top of the organisation and is cascaded down through the organisation.
- 6.3 The Chief Investment Officer is appointed to establish and monitor the implementation of the Asbestos Management Policy within the Group.
- 6.4 The Asset Management Directorate will implement the Asbestos Management Plan, collaborating with other teams within the Group. However, as the management of asbestos materials across our portfolio is of utmost importance, the Group engages either external contractors or in-house qualified operatives to ensure that any works undertaken meet the required standards.
- 6.5 The Group's Health & Safety Team arrange Internal Employee Health and Safety Audits to ensure the policy is effective in protecting the Health and Safety of all Group employees whilst at work.
- 6.6 Performance reporting for the management of asbestos containing materials in non-domestic areas is provided in Board and Asset & Sustainability reports. Monthly reporting is provided to Senior Management within the Asset Management Directorate. This reporting is provided by the Building Safety Team.

7. Equality and Diversity

- 7.1 We are committed to fairness and equality for all regardless of colour, race, ethnicity, nationality, gender, sexual orientation, marital status, disability, age, religion or belief, family circumstances or offending history, as referred to in our relevant Group policies. Our aim is to ensure that our policies and procedures do not create an unfair disadvantage for anyone, either directly or indirectly.

- 7.2 An equality impact assessment has been undertaken in respect of this policy and which identified no negative impact on any person/group with a protected characteristic.

8. Complaints

- 8.1 We aim to meet the needs of our customers by providing an excellent service. However, it is acknowledged that occasionally things go wrong and customers may wish to complain. Should the need arise to make a complaint, please refer to our Complaints, Comments and Compliments Policy.

9. Monitoring and Review

- 9.1 We will monitor the effectiveness of this policy, procedures and systems through relevant performance information, which will be reported through the Group Board, Executive Team, Group Audit and Risk Committee, Senior Leadership Team and appropriate Customer Panels.

This policy will be reviewed every three years or on the introduction of new legislation or best practice guidelines, whichever is the sooner.

- 9.2 Approved documents are valid for use after their approval date and remain in force beyond any expiry of their review date until an updated version is available.

10. Associated Documents

- 10.1 List of documents - associated policies, procedures and publications:

- Asbestos Management Plan
- Accident/Incident Reporting Form
- Accident/Incident Reporting Procedure

Relevant Legislation:

- Health and Safety at Work etc. Act 1974
- Management of Health and Safety at Work Regulations 1999
- Control of Asbestos Regulations 2012
- Health & Safety Executive – Asbestos: The Survey Guide - HSG264
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)
- Regulator of Social Housing: Consumer Standards - Safety and Quality Standard
- Social Housing (Regulation) Act 2023

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