



Asbestos Management Plan

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KEY TO TERMS

ACMs – Asbestos containing materials

CAR 2012 – Control of Asbestos Regulations 2012

HSE – Health and Safety Executive

KNH – Kirklees Neighbourhood Housing

SHE – Safety, Health and Environment

PAMP – Premises Asbestos Management Plan

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1. Introduction to the plan

- 1.1. This Asbestos Management Plan (AMP) has been developed to enable effective management of Asbestos Containing Materials (ACMs) within various communal areas and domestic properties that KNH operates and for which it holds maintenance responsibilities.
- 1.2. It has been developed in line with Our Asbestos Management Policy and the following principal legislation and regulations:
 - Health and Safety at Work Act 1974
 - Management of Health & Safety at Work Regulations 1999
 - Control of Asbestos Regulations (CAR) 2012
 - Construction, Design and Management Regulations 2015
 - Hazardous Waste Regulations 2005.
- 1.3. Alongside the following official HSE-issued Guidance documents:
 - L143 – HSE Approved Code of Practice (ACoP) to CAR 2012
 - HSG213 – ‘Asbestos essentials’
 - HSG227 ‘A comprehensive guide to managing asbestos
 - HSG264 ‘Asbestos: the survey guide’.
 - HSG247 ‘The Licensed Contractor’s Guide’
 - HSG248 ‘Asbestos: The Analysts guide for sampling, analysis and clearance procedures.
- 1.4. The overall aim of this Management Plan is to ensure that all ACMs present within KNH managed properties, through inspections, re-inspections, remedial or removal works are effectively managed and risks reduced to an acceptable level.
- 1.5. This Plan details the specific actions and responsibilities required by the nominated Duty Holder, appointed Responsible Person, or persons discharging delegated actions for the Duty Holder, in order to maintain compliance and ensure safety.
- 1.6. In effectively managing identified, or presumed, ACMs to properties KNH will ensure compliance with current legislation and reduce the risk of exposure to persons of asbestos fibres.

2. Responsibilities

- 2.1. The duties of management, staff and personnel of KNH shall be clearly communicated and agreed by all parties to ensure that all persons can undertake their duties as stated in this Plan. Communications and feedback detailing agreed responsibilities shall be kept and monitored by the Duty Holder or the relevant Responsible Person who shall initiate further training or assistance as deemed appropriate.
- 2.2. The Board of KNH is collectively and ultimately responsible for the implementation of the organisation's Asbestos Management Policy and the Asbestos Management Plan. The Board has delegated their Duty Holder responsibility to The Head of Asset Management, who has professional and technical responsibility for buildings owned and managed by the organisation. The Head of Asset Management will be supported by various qualified staff in undertaking the relevant duties. The Asbestos Management Plan shall be controlled by the Duty Holder and the Asbestos Technical Officer. The Duty Holder will ensure that the asbestos management process is compliant with current legislation, to include annual reviews or special event reviews following any circumstances outlined in the appropriate section below. The appointed Asbestos Technical Officer shall undertake the day to day management and coordination of any asbestos surveys, any required follow-up inspections, identified remedial works and maintain the updating of the Asbestos Register. They shall be appointed the Responsible Person who will advise and take the lead in reacting to any emergency incidents under the guidance and supervision of the Duty Holder. As such, the Asbestos Technical Officer will assume the role of Responsible Person as identified under CAR 2012 in such instances.
- 2.3. The Asset Management Team, in particular the Asbestos Technical Officer is responsible for:
 - Ensuring compliance with the Asbestos Management Plan
 - The overall strategy for the safe operation and execution of asbestos issues
 - Surveying the property portfolio and taking all reasonable steps to determine the location of ACMs
 - Identifying and training personnel on the Asbestos Management Plan and Policy
 - Keeping the Asbestos Register/database of ACMs up to date and providing a record of the location, condition, maintenance and removal for all ACMs
 - Carrying out risk assessments and documenting actions taken to manage asbestos present

- Reporting any incidents to the appropriate parties (HSE, SHE Manager, Board and Executive)
- Managing performance of both in-house and framework appointed asbestos consultancies and asbestos removal contractors.
- Arranging independent quality checks and auditing of contractors and agreed processes
- Taking action to arrange repair, seal, removal, or otherwise treatment of ACMs, if there is a risk of exposure due to its condition and/or location
- Periodically monitoring the condition of ACMs, updating the Asbestos Register and reassessing the risk (at predetermined timescales)
- Making information available to those who may come into contact or disturb ACMs. Information shall be provided in a written or electronic format and shall be correct on the date it is presented
- Initiating and reviewing arrangements to ensure that work which may disturb ACMs complies with current legislation
- Ensuring that prior to the commencement of any works which may have the potential to bring staff into contact with ACMs, the Asbestos Register is consulted, and relevant surveys are carried out, and the information used within the risk assessment for the works.
- Consult the asbestos surveying and analysis contractor for specialist asbestos advice where required, especially on:
 - prioritisation of re inspections, resurvey and actions,
 - recommended/required actions on surveys,
 - enforcement agency requirements/dealings,
 - removal contractor behaviour/performance
 - quality of information held and on the asbestos database
 - ad hoc advice and guidance
- Consult an asbestos removal contractor for advice and information on:
 - actions taken to remedy asbestos incidents/situations
 - directions received from asbestos surveying and analysis contractor
 - in relation to any 14-day waiver requests required from HSE

- Validating information recording on the asbestos register
- 2.4. To ensure the effective management of identified or presumed ACMs, all staff have a responsibility to co-operate with the Duty Holder and their appointed representatives in the management of all ACMs.
- 2.5. The following is a summary of their individual relevant responsibilities:
- Reduce exposure and prevent asbestos dust being released
 - Carry out a suitable and sufficient risk assessment of all associated risks before starting any work
 - Access and take account of relevant Asbestos information on the database system prior to commencing any works or, request to see the Asbestos information held on site
 - Comply with the requirements of this Plan, if any doubt exists treat any suspect material as an ACM, particularly insulation or insulating board
 - Stop works and enquire from the appropriate person if they suspect a material contains asbestos or are uncertain as to how to proceed
 - Protect the health of themselves, their work colleagues and any other person if they think asbestos fibres have been released. Restrict access to the area and inform their supervisor immediately and make sure any contamination does not spread to affect other people
 - Follow procedures set out by the Duty Holder and their team and use safe work methods and appropriate equipment
 - Control any items (belongings, carpets and soft furnishings etc.) they suspect may be contaminated with asbestos
 - Ensure the risk assessments and plans are followed and updated with any discovered risks identified as works progress
 - Where other areas of the building are likely to be damaged. undertake a suitable reassessment of the work

3. Management procedures

- 3.1. In order to effectively manage any ACMs, KNH have:
- Taken reasonable steps to identify materials in premises likely to contain asbestos
 - Presumed that materials contain asbestos, unless evidence proves they do not.

- Made a written record of the location and condition of ACMs and presumed ACMs and are keeping the record up-to-date
- Assessed the risk of the likelihood of anyone being exposed to these
- Prepared and put it into effect a plan to manage that risk so that:
 - material known or presumed to contain asbestos is kept in a good state of repair;
 - material that contains or is presumed to contain asbestos is, due to the risks associated with its location or condition, repaired, or if necessary removed;
 - anyone with the potential to disturb ACMs is informed of the location and condition prior to that risk arising.

3.2. In managing our responsibility KNH have undertaken to:

- Presume that materials contain asbestos; unless strong evidence is available that they do not
- Maintain written up to date records of the location and the condition of the asbestos and presumed asbestos-containing materials
- Assess the risk of the likelihood of anyone being exposed to ACMs
- Periodically review and monitor the Asbestos Management Plan, Procedures, Asbestos Action Plan and other arrangements put in place
- Carry out Refurbishment or Demolition surveys prior to commencement of all intrusive building/development works to identify the location and condition of any material that might contain asbestos
- Make available relevant information to contractors
- Regularly re-inspect asbestos containing materials in accordance with the Asbestos Management Plan and review risks as a result of those re inspections
- Continue to undertake management surveys and testing where applicable
- Ensure that staff are adequately and regularly trained
- Manage ACMs based on a risk based methodology in accordance with our Asbestos Management Policy

3.3. HSE guidance identifies a preference for managing ACMs in-situ. The approach taken by KNH is to adopt the HSE approach set out in their

Guidance, which aims to “reasonably and practicably” balance cost and risk, to determine if ACMs are to be:

- Managed in situ, including encapsulation or other remediation works
- Fully removed

- 3.4. Where possible, ACMs will be encapsulated and re-inspected on a regular basis when found within tenanted properties. Generally, only those materials likely to pose a serious risk to health, or be affected by works, will be removed in the first instance. Where possible all AIB will be removed from void properties and any AIB that cannot be removed, will be labelled appropriately.
- 3.5. Currently under development and expected early 2021 - As part of the sign-up procedure for new tenancies, tenants will be issued with a publication detailing where ACMs could be present with in their property and will be advised accordingly.

4. Asbestos Register

- 4.1. The KNH Asbestos Register is held on the AsbestosPro database. The register is a live working document and is updated to reflect removal projects, new survey data, re-inspections etc. From early 2021, AsbestosPro will be available remotely to all operatives enabling the asbestos register and any available survey reports to be viewed from site.
- 4.2. AsbestosPro registers the details of when asbestos information is accessed. It records details of who accessed the information and at what time. This provides KNH with a simple and audible means of ensuring that relevant persons are checking asbestos registers and held information before commencing works.

5. Identification of asbestos containing materials

- 5.1. All communal areas have been surveyed for the presence of asbestos in order to comply with Regulation 4 of CAR 2012.
- 5.2. Refurbishment surveys are being ordered for all void properties so as a means of expanding the archetypal data held on AsbestosPro.
- 5.3. All new acquisitions enter the void process and are therefore subjected to a refurbishment survey as part of that process. Any ACMS will be added to the re-inspection schedule using AsbestosPro.
- 5.4. Refurbishment surveys with relevant scope are ordered for all projects where intrusive works are being conducted.
- 5.5. KNH have appointed a number of internal asbestos surveyors to complete surveys to void properties. All other surveys are commissioned through the framework agreement.

- 5.6. All survey reports include material assessment, priority assessment, and bulk certificates, including an annotated plan which identifies the location of any samples taken within a property and references them accordingly.
- 5.7. KNH have adopted the scoring methodology used by the UKAS accredited surveying contractors for the risk assessing of ACMs. Where appropriate, KNH follow the advice given in their reports as to actions to be taken following the discovery of an ACM.
- 5.8. All relevant staff or contractors' staff shall have received adequate Asbestos Awareness Training, this shall be refreshed every 12 months.
- 5.9. See 'Procedure for commissioning of asbestos surveys.'

6. Commissioning of asbestos remediation/removal works

- 6.1. Commissioning of licensed asbestos removal works is restricted to the Asbestos Technical Officer (or delegated officer) and the Team Leader of the Asbestos Removals Team (or delegated officer). Works must not be commissioned by any other persons.
- 6.2. Licensed works will be commissioned using Kirklees Council standing list of approved contractors. For all projects, quotes will be requested from a minimum of three contractors. Works will be awarded to the contractor providing best value for money (taking into account price, duration of works and additional costs such as decant). In urgent situations, the Technical Officer can award work directly to a contractor using historical quotes from similar works.
- 6.3. The Technical Officer will appoint an analytical company from the Asbestos Surveying Framework, so as to ensure there is no conflict of interest. Air monitoring paperwork will be saved to Contact Manager and Asbestos Pro.
- 6.4. Non-licensed works will usually be completed by the KNH in-house asbestos removals team or sub-contracted to approved contractors on the Kirklees Council standing list and managed by the KNH in-house asbestos removals team. Orders to commission these works are raised by the relevant trades using Total. Non-licensed removal works will be overseen by the Asbestos Team Manager.
- 6.5. The Asbestos Team Manager (ATM) will be responsible for notifying the HSE of any notifiable non licensed works (NNLW) and will also be responsible for the provision of PPE and RPE to all operatives along with its maintenance and inspection. The ATM will also be responsible for their operatives' health surveillance. On completion of asbestos remediation/removal works, all relevant paperwork (clearance certificates, consignment notes, air test certification, statement of cleanliness etc.) must be sent to the Asbestos Technical Officer to ensure that the asbestos register is updated. Where in-house non-licensed works have been completed, the Asbestos removal contractor or in-house asbestos removal team must submit PPT 149 pro-forma

to the Asbestos Technical Officer accurately detailing the completed works. A statement of cleanliness must also be completed and submitted for every asbestos removal job. On completion of the works, all documentation will be stored electronically on Contact Manager and Asbestos Pro.

- 6.6. Prior to works being carried out all method statements and risk assessments are to be delivered to the Asbestos Technical Officer for review and approval prior to work commencement.
- 6.7. See 'Procedure for commissioning and recording of asbestos removal works.

7. Removal of ACMs

- 7.1. All non-licensed asbestos removals will be conducted in accordance with HSG213 Asbestos Essentials. Appropriate RAMS can be found here <G:\Common\1. Asset Team\ASBESTOS\Asbestos Procedures & associated forms and letters\Procedures and RAMS for removal>. Following removal a PPT 149 removal pro-forma and statement of cleanliness, will be issued by the site supervisor to KNHasbestos@knh.org.uk in order that the asbestos register be updated. Periodic air monitoring will be completed to ensure that fibre levels remain <0.01 f/ml.
- 7.2. No licensed asbestos removal works will be completed by KNH employees.
- 7.3. Quality checks and site visits will be completed at random to licensed removal works, this sample will increase as deemed necessary and based on relevant findings.

8. Re-inspection of identified asbestos containing materials

- 8.1. ACMs identified shall be re-inspected on a frequency dictated by risk.
- 8.2. Where ACMs are found to be in a dangerous state, or are located in a vulnerable position KNH will, where possible, remove, rather than manage these materials.
- 8.3. In the event of finding additional ACMs during the re-inspection process, the materials will be sampled and added to the re-inspection programme using AsbestosPro.

COMMUNAL AREAS

- 8.4. Materials deemed by the technical officer to be of a medium risk will be re-inspected every 12 months, or every 6 months should the material be located in a vulnerable position. 12 monthly inspections apply to AIB panels, AIB boxing's, cement in vulnerable areas, textured coating to walls (this list is not exhaustive).

- 8.5. Materials deemed by the technical officer to be of a low risk will be re-inspected on a two yearly basis. Materials within this category include, cement roof panels, AIB soffits as standard (this list is not exhaustive).
- 8.6. Very low risk items will be inspected three yearly. These include floor tiles, DPC, bitumen cable wraps, textured coatings to ceilings as standard (this list is not exhaustive).

DOMESTIC DWELLINGS

- 8.7. Materials of a medium risk rating will be re-inspected every 12 months, or every 6 months should the material be located in a vulnerable position. 12 monthly inspections apply to AIB panels, AIB boxings, cement in vulnerable areas as standard (this list is not exhaustive).
- 8.8. Low risk items will be re-inspected on a two yearly basis. Materials within this category include textured coating to walls, cement roof panels, AIB soffits as standard (this list is not exhaustive).
- 8.9. Very low risk items such as gaskets, cement soffits, textured coating to ceilings, floor tiles, cement undercloaking, roofing felt, bitumen adhesive residues and DPC and AIB undercloaking will be inspected on a three yearly cycle as standard (this list is not exhaustive).

9. Communicating information

- 9.1. The following shall be employed, to ensure that all necessary parties receive adequate information as to the presence of identified or presumed ACMs to each property.
- 9.2. In summary the following will apply:
 - Existing lines of communication shall be followed. All relevant parties: managers, staff, maintenance staff and external contractors, shall have knowledge of, and be trained in the use of AsbestosPro.
 - Asbestos information shall be included in all communications with all relevant third parties as necessary/relevant. Access to AsbestosPro will eventually be available to all internal staff. Currently, for asbestos information, staff and contractors should email all asbestos queries to the Asbestos Technical Officer using the knhasbestos@knh.org.uk email address.
 - No planned works of an intrusive nature shall go ahead without checking the Asbestos Register, a reference to the check of the Asbestos Register must be noted in the minutes of any project meeting to record it has been completed.

- Staff involved in planned works or maintenance shall consult either the supplied asbestos information or access AsbestosPro, noting the type and location of any ACMs.
- Any actions, removals or condition updates must be reported to the Asbestos Technical Officer to ensure that the Asbestos Register can be updated.
- The Asbestos Technical Officer shall be responsible for ensuring that the Asbestos Register is maintained and updated.
- Labelling of ACMs is not used as a primary method of identification and management, though it is used in certain higher risk environments at the Asbestos Technical Officers discretion.
- PAMP folders will, where practicable, be kept in a communal area on site. The exact location will vary between sites. A nominated person, for example the warden, is responsible for the control of the site file and is expected to provide the file to any person working within the building, prior to works commencing. The PAMP must be read, understood and signed by any person carrying out works, no matter how minor, within the building. Where it is not possible to store a PAMP on site, an electronic copy of the report will be held on AsbestosPro and Contact Manager. This can be requested at any time from the Asbestos Team using the knhasbestos@knh.org.uk email address. All PAMP folders will be reviewed annually.

10. Safe system of work

10.1. Contractors must operate and maintain a 'Safe System of Work' in respect of all ACMs identified.

10.2. In order to comply we will:

- Ensure that all pre-commencement discussions identify and make available all asbestos information held;
- Identify, through the use of AsbestosPro the presence of asbestos;
- Where intrusive works are planned, arrange and undertake a Refurbishment and Demolition survey, passing a copy of the results to the contractor in advance;
- Re-assess and reclassify, via a new 'Risk Assessment' and amending the 'Plan of Work' where ACM's have deteriorated or become damaged;
- Use all appropriate available information to help develop safe systems of work;
- Follow the requirements set out in the Construction Design Management Regulations 2015 in developing a preconstruction Health and Safety plan.

10.3. Relevant contact details for members of KNH will be provided to all contractors undertaking work on site, so any suspect ACMs discovered or damaged during works can be reported to the appropriate Responsible Persons.

11. Guidance for containing accidental fibre release

11.1. Anyone suspecting that an ACM has been disturbed resulting in potential asbestos fibre release, will immediately follow the procedures highlighted in Asbestos Incident Procedures 2019.

12. Training

12.1. The Duty Holder, through the Organisational Development team, will be responsible for ensuring that all relevant staff receive appropriate and sufficient training. All KNH staff will receive UKATA accredited asbestos awareness training. Those carrying out the re-inspection of ACMs will be trained to British Occupation Hygiene Society (BOHS) P402 (or equivalent). Non licensed asbestos removal operatives will receive appropriate Non-licensed asbestos removal training (previously known as CatB training).

13. Health surveillance

13.1. KNH acknowledges the requirement for employers to keep a register (health record) of NNLW with asbestos for each employee exposed to asbestos:

13.2. The records will include:

- the nature and duration of work with asbestos and estimated exposure for each individual worker
- dates of the worker's medical examinations

13.3. These registers of work (health records) must be kept for 40 years (and offered to HSE or the individual concerned should the business cease trading).

14. AIB management

14.1. There is a programme of surveys to 'AIB hotspots' and remediation works commences on receipt of the survey reports.

14.2. Where possible, the HSE preferred method of managing in situ will be adopted. However, each property will be assessed individually.

14.3. In general:

- Where AIB is found in good, sealed condition, it will be re-inspected on an annual basis unless a risk assessment finds a high potential for damage is expected, in this situation the re-inspection shall be 6 months.

- Where AIB is found to be in good but unsealed condition, it will be encapsulated with ET150 encapsulate paint (or other suitable alternative) and the material re-inspected on an annual basis unless a risk assessment finds a high potential for damage is expected, in this situation the re-inspection shall be 6 months.
- Where AIB is found in poor condition, it will be removed by a licensed asbestos contractor under fully controlled conditions.
- Where AIB debris is found to be in a condition where fibre release is likely and the tenants are at risk of exposure, the area will be sealed until removal is possible. Air monitoring will be conducted to ascertain the airborne fibre concentration. In the unlikely event that fibre concentrations are >0.01 f/ml, the tenant will be decanted and the property decontaminated.
- Where AIB is found to a void property, it will, if possible, be removed. Where the AIB has to remain in situ, for example where it forms part of the building's structure, it will be labelled appropriately.

15. Reviewing the plan

15.1. Once implemented, the Asbestos Management Plan will be reviewed every 12 months, following a change in legislation, update in good practice, following a major incident, following a significant change to the property portfolio, or if any reason comes to light to suggest that the Asbestos Management Plan is inadequate.

15.2. The review shall consider the following:

- Whether information about identified or presumed ACMs is available and reaching those who need to know
- Whether the assessments of these materials are still applicable
- Whether the management strategy implemented for these materials is sufficient
- Whether the Asbestos Management Plan is achieving its goals of effective management of ACMs and prevention of exposure to asbestos fibres
- If the Asbestos Management Plan is not achieving its objectives, then it should be reviewed at an appropriate frequency until an effective Asbestos Management Plan is in operation.