Asbestos Management

Policy, Plan and Procedures

Policy Control

Policy reference	HS002
Department	Health and Safety
Author	Rachel Cavey
Owner	Emma King
Version	V10
Reason for revision	June 2026 review by Emma King/Rachel Cavey.
Status	Final
Intended recipients	Derby Homes Service Users, Visitors, and Staff
Training and dissemination	Controlled Documents and Training
To be read in conjunction with (other policies)	N/A
Policy approved by Date	Governance Committee
Meeting approved Date	Governance Committee 17 September 2026
Implementation Date	2012
Review period	Officer Review June 2026 by EK/RC Governance Committee
Next review date	September 2029 Officer Review December 2026

Contents

1. Background 3
2. Policy statement 3
3. Responsibilities 4
4. Identification of Asbestos 8
5. Asbestos management strategy 10
6. Asbestos information 11
7. Asbestos training 14
8. Asbestos instruction 15
9. Asbestos removal 15
10. Management of contractors 20
11. Construction design and management (CDM) 2015 compliance 21
12. Emergency procedure 21
13. Communication, implementation, monitoring and review of asbestos management policy, plan and procedures 22

1. Background

Derby Homes are responsible for the management of approximately 12,500 assets across the city of Derby on behalf of Derby City Council. Many of the properties were constructed prior to the ban of asbestos in 1999 and hence may have been built or refurbished using Asbestos Containing Materials (ACMs). Exposure to asbestos can be lethal and asbestos related diseases are currently the biggest workplace killer in the UK with over 5,000 people losing their lives every year. The trades most at risk are those involved with maintenance and refurbishment of buildings and because this is an integral function for the management of social housing it is imperative that Derby Homes has a plan on how to reduce the risk of asbestos exposure for its' employees, contractors, and tenants.

The aim of this document is to detail how Derby Homes will manage asbestos including policy, the asbestos management plan, and procedures to facilitate staff, contractors, and visitors in adhering to the policy and plan. It includes details on how Derby Homes intends to:

- protect those working on the fabric of our properties.
- protect those working and living in our properties.
- effectively control any works likely to affect ACMs.
- identify and categorise ACMs, and manage hazards based upon prioritisation and assessment of the risk that they present.
- produce a prioritised programme for the remediation of ACMs that, because of their location and, or condition, present an actual perceived risk to health, and to remove such risk as soon as possible.
- monitor and maintain the condition of identified ACMs that are assessed as being able to be left in-situ.

The presence of an ACM does not in itself constitute a danger. However, the ACM may pose a hazard if disturbed or damaged and must be treated accordingly. The primary purpose of this plan therefore is to ensure that ACMs are not disturbed, except in a controlled environment during the removal process. The majority of the assets managed by Derby Homes contain low risk asbestos materials following strategic removal of higher risk ACMs in the past.

2. Policy statement

Derby Homes are committed to minimising the risks associated with asbestos in its properties in line with its duties as a landlord and recognises the fundamental importance of asbestos safety and the need to operate a clear asbestos policy to ensure the safety and welfare of service users, visitors, and staff.

This policy with accompanying asbestos management plan and procedures sets out our approach to mitigating the risks associated with asbestos. We will comply with all relevant legislation, principally:

- The Control of Asbestos Regulations (CAR) 2012
- Health and Safety at Work Act 1974
- The Management of Health and Safety at Work Regulations 1999
- Construction (Design and Management) Regulations 2015
- Workplace (Health, Safety and Welfare) Regulations 1992
- Asbestos: The Analysts' Guide HSG248
- Asbestos essentials: A task manual for building, maintenance, and allied trades on non-licensed asbestos work HSG210
- Asbestos: The licensed contractors' guide HSG247
- The Hazardous Waste (England and Wales) Regulations 2005
- Asbestos: The Survey Guide 2010 HSG264
- Approved Code of Practice L127 The Management of Asbestos in Non-Domestic Premises
- Approved Code of Practice L143 Work with Materials Containing Materials
- A comprehensive guide to Managing Asbestos in premises HSG227
- Subsequent documents that replace any of those listed above

3. Responsibilities

3.1 The Board

The Board of Derby Homes has overall responsibility for the health, safety and welfare of all employees and anyone else who could be affected by our work activities. With respect to asbestos this includes:

- Ensuring an effective asbestos management policy is in place for work activities undertaken by Derby Homes
- Ensuring an effective asbestos management policy is in place for properties managed by Derby Homes.
- Ensuring adequate resources are made available to meet Derby Homes' legal obligations with respect to asbestos and ensure as far as reasonable the safety of staff and residents.

3.2 The Managing Director of Derby Homes

The Director of Derby Homes is responsible for ensuring the implementation, monitoring and review of the Asbestos Policy, Plan and Procedures and has overall responsibility for asbestos with respect to:

- Domestic properties managed by Derby Homes
- Premises and offices occupied by Derby Homes
- Activities of Derby Homes and its employees.

The duty holder's legal responsibilities cannot be delegated, but duty holders can nominate others to do all or part of the work to assist in complying with the duties. Anyone or any organisation who is nominated to do some work as a result of this regulation must know what it is they have to do and be able to do it safely. They should be competent to do this work.

3.3 Director of Investment & Maintenance and the Asbestos Manager

The Director of Investment & Maintenance with the support of the Asbestos Manager have been nominated by the Managing Director of Derby Homes to fulfil the organisations duties in relation to asbestos. The competence of the Asbestos Manager has been verified as part of the recruitment process by the Health and Safety Manager. To realise this duty the Director of Investment & Maintenance and the Asbestos Manager will help

- Ensure that Derby Homes complies with its duties under the Control of Asbestos Regulations (CAR) 2012 and other relevant legislation in relation to asbestos.
- Produce, implement, and maintain an Asbestos Management Plan (Asbestos Management Policy, Plan and Procedures) that complies with all regulations for managing asbestos.
- Assist in the planning, organise, and programme asbestos management surveys of buildings as required, ensuring ACMs are regularly inspected and controlled as required.
- Hold and manage an asbestos register.
- Oversee the organisation and management of asbestos remedial works.
- Provide professional advice and guidance to managers and teams working with or around asbestos.
- Ensure Derby Homes strategy and systems effectively coordinate and manage asbestos related activities across all of the business.
- Develop, implement, and manage appropriate systems for recording and monitoring work with exposure to asbestos.
- Review and monitor Derby Homes management of asbestos related records management arrangements and be responsible for developing and improving current systems.
- Review and develop systems to ensure Derby Homes effectively communicates appropriate asbestos related information to tenants, contractors, and other stakeholders.
- Coordinate and manage actions arising from asbestos risk assessments.

- Develop and deliver asbestos training.
- Plan and undertake periodic audits of Derby Homes management systems, policies, procedures, and practices.
- Monitor and audit a sample of asbestos works undertaken within Derby Homes by staff, contractors, and consultants.
- Investigate and review asbestos related incidents at Derby Homes managed properties.
- Keep up to date with current asbestos regulations, guidance, and best practice.
- Create, implement, and update the Asbestos Management Action Plan

3.4 Heads of Service, Managers and Supervisors

All Heads of Service, Managers and Supervisors have a general duty of care to:

- Ensure members of their team, contractors, visitors, and any other stakeholders of Derby Homes have access to asbestos register information prior to commencing any work that may disturb the fabric of a building including routine maintenance tasks. Where register information is not available then asbestos must be presumed, in the work area and/or property.
- Monitor activities of all staff, contractors, visitors, and other stakeholders to ensure they are complying with current asbestos legislation, policy, and procedures.
- Assist the Asbestos Manager in fulfilling duties by making staff available for training when required, reporting any incidents, ensuring staff have adequate equipment in relation to asbestos including RPE and PPE and allocating sufficient time to conduct asbestos works.
- Ensure any contractors appointed have had their asbestos method statements, risk assessments and training checked by a competent person, preferably the Asbestos Manager at the procurement stage. The Asbestos Manager will also provide on-going support in the review of asbestos method statements and risk assessments where required.
- Attend asbestos contractor site visits as and when required, in order to help plan and coordinate, the works effectively.

3.5 Site Operatives and Surveyors

All staff involved with maintenance and refurbishment works that have been trained to carry out non-licensed asbestos works including site operatives, supervisors and surveyors have a duty of care to:

- Read the asbestos register information prior to commencing any work that may disturb the fabric of a building including routine maintenance tasks. Where register information is not available then asbestos must be presumed to the area and/or property.
- Be alert to the potential of asbestos hazards especially in areas where asbestos surveying is restricted such as within electrical and gas equipment, loft spaces, cavity walls and behind items that would diminish the security of a building by removing items to conduct asbestos surveys e.g., windows, doors, soffits, and roofing materials.

- Follow all procedures in relation to asbestos including the emergency procedures to be used if suspect or confirmed ACMs are discovered or damaged.
- Attend or undertake appropriate training as required.
- Wear any PPE and RPE that has been provided for working with asbestos.
- Carry out a pre-use RPE check every time half mask or hood worn. Conduct RPE maintenance checks monthly for half masks and weekly for hoods and document accordingly.
- Follow method statements detailed in Asbestos essentials: A task manual for building, maintenance, and allied trades on non-licensed asbestos work HSG210.

3.6 All Staff

All members of staff have a general duty of care to:

- Follow procedures and guidance in relation to asbestos.
- Use the asbestos register to attain information about ACMs when planning repairs, maintenance, refurbishments, and demolitions for buildings managed by Derby Homes.
- Be alert to the potential of asbestos hazards and report such hazards accordingly.
- Attend or undertake appropriate asbestos training as required.

3.7 Contractors and Subcontractors

All contractors and subcontractors employed by Derby Homes have a general duty of care to:

- Provide method statements and risk assessments in relation to asbestos prior to commencing works including an emergency asbestos procedure for when suspect ACMs are discovered or disturbed.
- Comply with current legislation, approved codes of practice, procedures, and guidance in relation to asbestos and adhere to Derby Homes Asbestos Management Policy, Plan and Procedures.
- Use the asbestos register to attain information about ACMs when planning and conducting any work that may disturb the fabric of any buildings managed by Derby Homes.
- Be alert to the potential of asbestos hazards and report such hazards accordingly.
- Immediately cease works if suspected ACMs are discovered, and report to the relevant contract manager and/or Asbestos Manager for advice/action before proceeding
- Possess appropriate asbestos training certificates for the level of work being conducted.

3.8 Visitors and other Stakeholders

All visitors and other stakeholders of Derby Homes have a general duty of care to:

- Comply with current legislation, approved codes of practice, procedures, and guidance in relation to asbestos and adhere to Derby Homes Asbestos Management Policy, Plan and Procedures

- Use the asbestos register to attain information about ACMs when planning repairs, maintenance, refurbishments, and demolitions for buildings managed by Derby Homes.
- Be alert to the potential of asbestos hazards and report such hazards accordingly.
- Attend or undertake appropriate asbestos training as required.

4. Identification of Asbestos

Derby Homes continues to carry out asbestos surveys of all assets under its control. Historical asbestos information, in the form of previous asbestos surveys is available for the majority of the 12,500 assets. We continue to survey and update asbestos register as required. Where access has not been possible despite repeated attempts, if asbestos information is not available, the properties are presumed to contain asbestos.

4.1 Asbestos Surveys

All asbestos surveys will be completed in accordance with Asbestos: The Survey Guide (HSG 264). There are two types of survey contained within HSG 264, a Management Survey and a Refurbishment and/or Demolition survey. For each type of survey, a scope of works will be agreed with the consultant to establish the areas to be surveyed and the accepted limitations.

If an asbestos survey is required, it should be requested by completing the Asbestos Works Request Form (see appendix) and emailed directly to the Contractor, copying in the Asbestos Manager. The request will then be processed, and a PDF of the survey will be available on the asbestos surveying contractor's portal TEAMS and the results uploaded into Open Housing to update the register.

To complete the register all properties at the pre-void stage will be checked for a suitable and sufficient asbestos survey. If there is not an asbestos survey present or if the existing survey is insufficient for the management of ACMs a Management Survey will be conducted while the property is void. If intrusive works are to be completed to the void dwelling a Refurbishment Survey will also be arranged for these areas and will include risk assessments for the management of any ACMs that will remain in situ following the works.

Housing Officers will also assist in the completion of the asbestos register by notifying the Asbestos Manager to arrange an asbestos survey of previously difficult to access addresses when they establish contact with the tenant.

4.2 Management Survey

The purpose of a Management Survey is to locate, as far as reasonably practicable, the presence and extent of any suspect ACMs in the building which could be damaged or disturbed during normal occupancy, including foreseeable maintenance and

installation, and to assess their condition. Management surveys will often involve minor intrusive work and some disturbance. The extent of intrusion will vary between premises and depend on what is reasonably practicable for individual properties. The survey will usually involve sampling and analysis to confirm the presence or absence of ACMs. A management survey can also involve presuming the presence of asbestos.

Management surveys have been conducted for all assets inspected since 2010 and will be continued to be conducted for all buildings without asbestos information. Where existing asbestos information is deemed insufficient a further Management Survey will also be conducted. Surveys are also conducted on new acquisitions.

4.3 Refurbishment or Demolition Survey

A refurbishment or demolition survey is required before any refurbishment or demolition work is carried out. A list of example works is provided below. This type of survey is used to locate and describe, as far as reasonably practicable, all ACMs in the area where the refurbishment work will take place or in the whole building if demolition is planned. The survey will be fully intrusive and involve destructive inspection, as necessary, to gain access to all areas, including those that may be difficult to reach. A refurbishment survey may also be required in other circumstances, e.g., when more intrusive maintenance and repair work will be carried out or for plant removal or dismantling. If refurbishment work involves running pipes, cables or similar through other rooms or into areas not immediately obvious as being in the work area then Derby Homes will inform the surveyor so that these areas can also be surveyed.

Refurbishment Works Examples

These works will be classed as refurbishment works if carried out by any team in Derby Homes. This list is not exhaustive.

- Replacement of bathrooms, kitchens, roof, roofline products, windows, doors, and heating systems.
- Full electrical rewires
- Knocking down or through walls or ceilings

Derby Homes will assist the surveyor in areas where other hazards may prevent the surveyor gaining intrusive access e.g., within electrical or gas installations. If there is reason to believe that asbestos fibres may have been released during the course of the surveying process an air test will be conducted before the area can be reoccupied.

4.4 Asbestos Surveyors

All asbestos surveys will be completed by surveyors who have the proficiency certificate BOHS P402 Sampling and Surveying for Asbestos or equivalent and at least 6 months practical experience conducting surveys of similar properties. Derby Homes will commission UKAS accredited consultants (ISO 17025 and ISO 17020) to conduct the surveys and carry out the laboratory analysis to ensure adequate quality

management systems and demonstration of independence, impartiality, and integrity. Consultants will also be required to hold sufficient public liability, employer liability and professional indemnity insurance. References will be sought prior to commencement of any contract agreement.

4.5 Risk Assessments

Management Surveys and Refurbishment Surveys will contain material risk assessments (risk of fibres being released based on material and condition) for any ACMs identified. Derby Homes will ensure that the surveyors use the algorithm detailed in HSG 264 for compiling the material assessment score as detailed in the appendix. Priority assessment scores (likelihood of someone disturbing the ACM) will be compiled by Derby Homes and the surveying company in line with guidance in HSG 264 (see appendix). These scores will then be combined to create the overall risk assessment score and used to create an action plan for the management of the asbestos. Derby Homes will prioritise any management actions based on this score.

5. Asbestos management strategy

Management actions will be prioritised based on the total risk assessment score. Due to the volume assets under the control of Derby Homes it is likely that numerous properties will have identical scores. Where uniform scores do exist, other factors will be taken into consideration such as planned maintenance to the properties, tenant requirements and occupancy status of the asset. Derby Homes will adhere to the guidance provided by the Health and Safety Executive (HSE) and will only remove ACMs if they are damaged or in a location where they are likely to be disturbed.

Derby Homes will adopt the following asbestos management actions.

- Removal of damaged ACMs or those in locations where they are likely to be disturbed. If immediate removal of damaged ACMs cannot be arranged access to the affected area should be restricted.
- Repair of damaged ACMs if the general condition and location of the ACM is not so severe that the ACM must be removed.
- Encapsulation / sealing / encasing of ACMs that currently have insufficient surface treatment e.g., unsealed asbestos insulating board.
- Routine inspections of ACMs are carried out in non-domestic premises or common areas of domestic blocks should be inspected at least 12 monthly or sooner if the risk assessment deems necessary. Re-inspection information collected will be used to update the asbestos register. Re-inspections of non-domestic properties will be completed as part of the routine building inspections. As asbestos re-inspection will be completed to record the inspection (see appendix)

Asbestos labelling will generally not be used by Derby Homes as it is impracticable and unsightly in domestic premises, however in non-domestic premises and common areas of domestic blocks labelling will used where practicable, in the format shown in Figure 4.1 below.



Figure 4.1 Standard Asbestos Label

6. Asbestos information

6.1 Distribution within Derby Homes

Asbestos information is collected on a module of the electronic asset management system Open Housing. Open Housing forms the asbestos register for Derby Homes (example register entry in Figure 6.1 below). Open Housing is intended to be a live database and hence will be updated as promptly as reasonably practicable with all new asbestos surveys conducted, bulk samples taken, removals, encapsulations and any other activities that may be used to provide a complete picture of the ACMs at Derby Homes.

All information regarding the type of asbestos, location, condition, quantity, re-inspection, and recommendations for all assets will be recorded and can be viewed on Open Housing All staff will be given access to Open Housing.

Where the asbestos register is not available due to an emergency time constraint, the contractor survey portal should be used as mitigation.

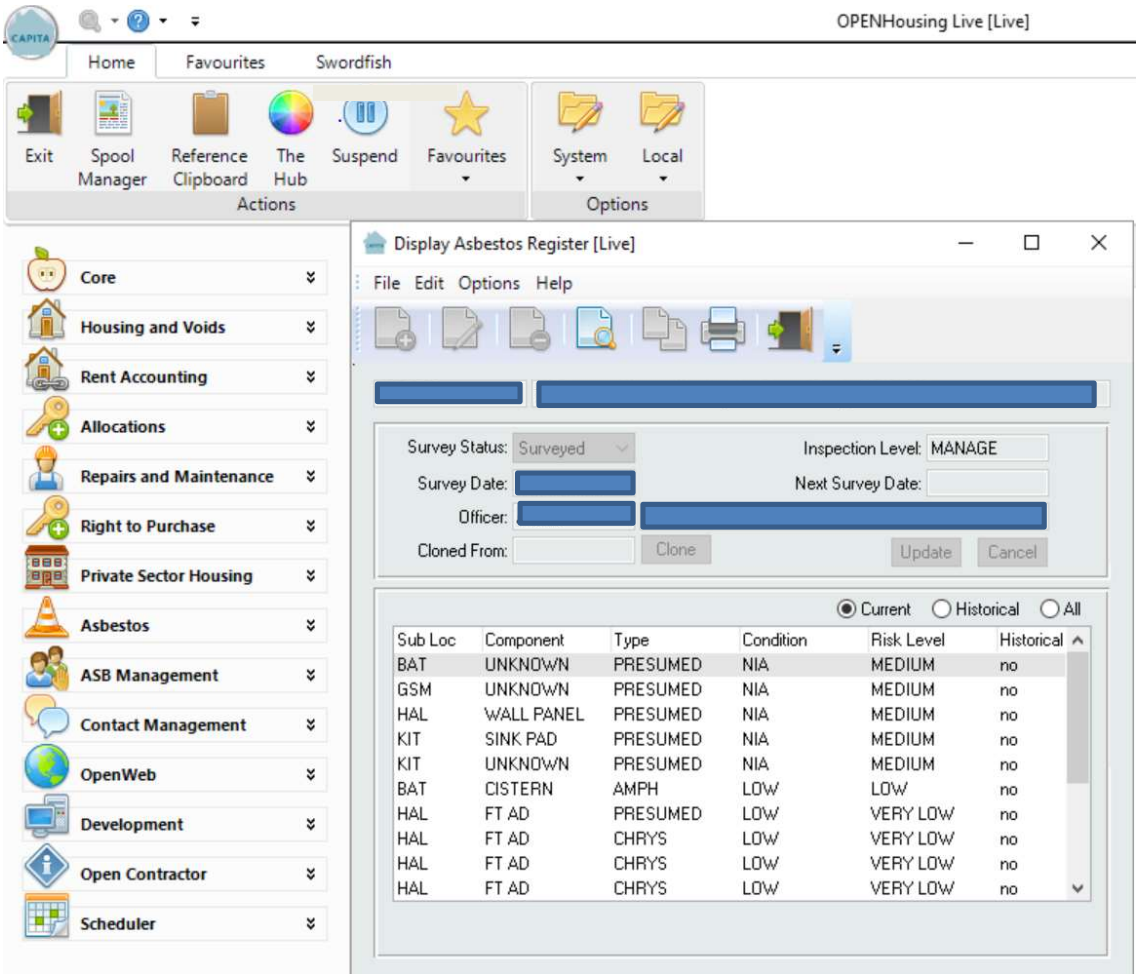


Figure 6.1 Open Housing Asbestos Register

Planned Works

All employees will have access to Open Housing asbestos reports. The contractor survey portal is available for additional mitigation, for any planned works that may disturb asbestos. If a survey is not available at the planning stage, it will be requested and completed prior to works commencing.

The voids team receive summarised asbestos information on their printed job cards. The job card system electronically pulls asbestos information from Open Housing.

Responsive (Day to Day) Repairs

Any employees that do not have access to Open Housing will be provided with an asbestos warning tag on the electronic job card on their mobile phone, through Total Mobile

If for any reason the Total Mobile is not operational employees will be provided with a hardcopy of the Open Housing register report by their planner or supervisor for works, they have been allocated that will disturb the fabric of the building. For works that are unlikely to disturb the building e.g., servicing a boiler model that is known not to contain

asbestos the operative will carry out the work and contact their supervisor or planner if works extend beyond the original scope or if ACMs are suspected. The planner or supervisor will access the register for them, and relay information contained within the register via email or text.

Out of hours staff without suitable electronic devices will be able to call the Out of Hours Manager who will access Open Housing, or the contractor's survey portal on their laptop and send the asbestos information via email or text. At weekends Carelink operators will access Open Housing for the out of hours staff and relay asbestos register information if required.

If for any reason asbestos information is not accessible or available, employees will continue with the assumption that all materials could contain asbestos and treat them as such.

6.2 Non-Licensed Asbestos Work

For those employees doing non-licensable work with asbestos, Derby Homes will make the following information available for the current work being done:

- a copy of the risk assessment for that work;
- a copy of the plan of work;
- where applicable, details of any air monitoring and results.

In addition, the following information will be made available to workers, on request:

- maintenance records for control measures e.g., H Vacs, RPE;
- personal information from health records (relating only to the individual employee concerned);
- the results of any face-fit test for RPE provided for work with asbestos;
- a copy of the individual's training record.

6.3 Contractors and Visitors

Asbestos information is provided to contractors and visitors where appropriate in the form of an Open Housing report for the asset where the contractor or visitor is liable to disturb asbestos.
Contractors need to provide records of appropriate training, as a minimum asbestos awareness, ensuring this is continually refreshed.
An emergency procedure also needs to be in place, and included in their risk assessments and method statements (RAMS).

6.4 Tenants

Tenants will be provided with a copy of the information we hold on our asbestos register relating to their property, during the sign-up process. Any tenants living in Thorncliffe construction properties will be sent an annual letter to remind the tenants of the ACMs present in their home. Tenants will also be sent information about asbestos via tenant newsletters telling them of possible ACMs in their home, what to do if they wish to conduct DIY or embark a contractor to carry out works for them and

who to contact if they accidentally disturb materials that they suspect or know to contain asbestos.

6.5 London Road Depot

All employees, contractors and visitors conducting works that may disturb ACMs at London Road Depot will read the hard copy of the asbestos register that is located at reception. The log will be signed to confirm that the register has been read and understood.

7. Asbestos training

In line with regulation 10 of CAR 2012 all employees that are liable to disturb asbestos are trained to at least asbestos awareness level to ensure they can recognise ACMs and know what to do if they come across them in order to protect themselves and others. Additionally, many of the operatives receive Non-Licensed Asbestos Work training to allow them to carry out asbestos work that it incidental to the job they are completing. Examples of such tasks are listed below. Training needs analysis will be conducted for all roles within the organisation to establish the topics to be covered in the training and ensure all staff have the correct level of competence to keep themselves and others safe.

Incidental Asbestos Works

- Drilling, screwing into and removing screws from asbestos cement, asbestos insulating board and asbestos textured coatings.
- Removal of asbestos floor tiles to facilitate replacement of a floor covering.
- Removal of up to $1m^2$ of intact asbestos textured coating attached to a plasterboard substrate to allow works to be conducted to the area above or behind.
- Removal of asbestos gaskets for pipework and heating equipment repairs.
- Removal of intact asbestos toilet cistern.



Figure 7.1 Drilling asbestos textured coating

An asbestos training matrix will be maintained to record the levels of training received and when refresher training is due. Training will be refreshed annually or sooner if a person changes role. The refresher training received will be dependent on the role of the individual and will aim to keep the employee up to date with any changes of process within the organisation in relation to asbestos.

All contractors and subcontractors commissioned by Derby Homes are required to have a level of training in line with the work that they have been engaged to do. This will be verified by Derby Homes prior to commencement of works.

8. Asbestos instruction

In order to implement and consolidate the skills learned during training Derby Homes will continue to provide on the job training, instruction, and assessment. General health and safety audits are carried out. Completed risk assessments and Plans of work paperwork are monitored for non-licensed works to ensure compliance with safe working practices provided through asbestos training and procedures. Additional training and supervision will be provided as and when required.

Managers and supervisors by the nature of their role will have the most influence over their team members and should use this influence to positively reinforce asbestos safe working procedures and offer guidance to staff where necessary. Managers and supervisors should contact the Asbestos Manager if additional training for team members is required.

9. Asbestos removal

Derby Homes site operatives have been trained to work with non-licensed materials but will only carry out removals that are incidental to the work they are conducting.

9.1 Plan of Work

For any work involving asbestos, including maintenance and survey work that may disturb asbestos Derby Homes or the licensed asbestos removal contractor will draw up a written plan of how the work is to be carried out before it starts. Managers and Supervisors at Derby Homes or the removal organisation will make sure their team follow the plan of work (method statement) so far as reasonably practicable.

The plan of work must include the following information:

- the nature and probable duration of the work;
- the number of people involved in the work;
- the address and location where the work is to be carried out;
- the methods to be used to prevent or reduce exposure to asbestos, e.g., prevention and control measures, arrangements for keeping premises and plant clean and arrangements for the handling and disposal of asbestos waste;
- the type of equipment, including PPE and RPE, used for: protecting and decontaminating those carrying out the work;
- protecting other people present at or near the worksite.

Where necessary, the plan should include the site layout, a description of the location and nature of the asbestos present and which ACMs will be disturbed by the work.

For Derby Homes employees conducting asbestos work the Plan of Asbestos Work form (see appendix) will be completed on site prior to commencement of works. This will be forwarded to the Asbestos Manager with an Asbestos Register Update Form (see appendix) when required following completion of the asbestos works.

9.2 Suitable and Sufficient Risk Assessments *

All non-licensed asbestos work tasks carried out by Derby Homes employees will follow methodology in HSG 210. When followed, these tasks have been proven by the HSE to keep asbestos exposure levels below the control limit of 0.1f/cm^3 over a 4-hour period and 0.6f/cm^3 over 10 minutes. Derby Homes will use HSG 210 as the main risk assessment with site specific asbestos risk assessments. Asbestos type, product type, means of attachment, extent and condition of the ACMs will be included on the Plan of Asbestos Works form. Most other hazards have specific risk assessments which can found on the Health and Safety section of DHnet and/or SHE Assure. Additional risk assessment will be completed for any non-standard risks encountered. Risk assessments will be available on site at all times.

9.3 Licensed Asbestos Removal Contractors

Derby Homes will commission contactors with an asbestos removal license from the HSE for all asbestos works with licensed materials, notifiable non licensed tasks or non-licensed tasks not covered by Derby Homes employees. All works will be conducted to the requirements of CAR 2012 using the correct control measures and work methods to prevent exposure and reduce the spread of ACMs following guidance in Asbestos: The licensed contractors' guide HSG247.

Licensed asbestos removal contractors will be responsible for producing their own site-specific risk assessments and plans of work. A copy of the risk assessments, plan of work and any notifications will be sent to the Asbestos Manager prior to commencement of works.

Licensable asbestos works are normally subject to a 14-day notification period prior to start date to allow the relevant enforcing authority to review the contractors Plan of Work (method statement). In exceptional cases the enforcing authority may grant a waiver to this notification if just cause can be demonstrated to them. The Asbestos Manager will review a copy of the contractor's method statement and risk assessments for all asbestos removal projects. For routine tasks this may be at the start of the contract period. A copy of notification forms (ASB5/ASBNNLW1) will be emailed to the Asbestos Manager for all works requiring HSE notification.

As per CAR 2012 licensed contractors should have the following information available on site for inspection.

For the specific work being done:

- a copy of the risk assessment for that work;
- a copy of the plan of work;
- details of any air monitoring and results;
- details of notification under regulation 9 made to the enforcing authority.

More general information:

- maintenance records for control measures;
- personal information from health records (only relating to the individual employee concerned);
- the results of any face fit test for RPE provided for work with asbestos;
- a copy of the licence;
- any anonymised collective information from the health records.

Derby Homes will also request public liability, employer liability and professional indemnity insurance certificates and training records for operatives and supervisors. References will be sought prior to commencement of any contract agreement.

9.4 Derby Homes Non-Licensed Asbestos Works

Only operatives who are trained will be permitted to carry out non-licensed work. Employees without this level of training will not be allowed to conduct asbestos works. Anyone under the age of 18, including apprentices, will also not be permitted to carry out non-licensed works. All works will be carried out following method statements in Asbestos essentials: A task manual for building, maintenance, and allied trades on non-licensed asbestos work HSG210. Derby Homes employees will not carry out notifiable non licensed works and so formal health surveillance is not required. Derby Homes will however keep a record of all non-licensed works conducted by employees including details of the date undertaken, duration of the works, control measures used, and asbestos tasks completed.

All staff trained to work with non-licensed asbestos will be face fit tested using a qualitative method (Bitrex) and issued with a Sundstrom SR100, SR90-3 or equivalent ori-nasal half mask with a P3 filter (Figure 8.1) and storage box. Employees should be clean shaven (in the area where the mask seals with the face) when wearing a mask to ensure the protection factor is maintained and in line with manufacturer's instructions. Dedicated beard wearers will be required to wear a suitable powered hood. Respirator maintenance records will be completed by all people that have been issued with a mask or a powered hood on a monthly basis. These checks can be carried out via SHE Assure.



Figure 8.1 Sundstrom Ori-nasal1/2 Masks

An asbestos work kit which contains the following items will also be issued.

Check list:

- Spare mask filters and pre filters
- Type 5/6 disposable overalls
- Asbestos waste bags (red and clear)
- Minimum 500-gauge polythene
- Shaving foam
- Pump action water sprayer with suppressant (washing up liquid)
- Disposable gloves
- Safety glasses
- Disposable foot covers
- Cloth/duct tape
- Asbestos warning sign
- Asbestos warning tape
- Wet wipes
- Commonly used asbestos task sheets from Asbestos essentials: A task manual for building, maintenance, and allied trades on non-licensed asbestos work HSG210

9.5 H-Type Vacuums

Derby Homes has H-Type vacuums that are available for all staff conducting non-licensed works to use. The vacuums are stored at the London Road Depot. A log will be kept by the Resources Supervisor of people that use the vacumes including name, date collected, date returned and any issues.

The vacuums will be used in accordance with training and instructions in HSG 210. The vacuums will not be used for general vacuuming, to collect saturated ACMs or in conjunction with control measures that may clog the vacuum such as shaving foam. Vacuums and attachments should be kept in a clear plastic bag to prevent asbestos spread in the rare occurrence of the filter becoming detached from the main chamber of the machine.

All H-Type vacuums must be serviced and have a dispersion of particle (DOP) test conducted every 6 months by a licensed asbestos contractor. The vacuums will not be emptied by Derby Homes staff and when full will be sent to a licensed asbestos contractor to be emptied under controlled conditions. The Resources Supervisor maintains a record of servicing dates and will be responsible for ensuring availability of H Vacs for use.

9.6 Asbestos Waste

All asbestos waste created by Derby Homes staff will be disposed of using UN approved packaging. The waste will be double bagged or wrapped using a red then clear asbestos waste bag or 500-gauge polythene with an asbestos bag attached to

identify the waste as hazardous. Asbestos waste bags will not be filled more than half full as they are more likely to split if overfilled. Overalls and wipes used for asbestos work will also be disposed as asbestos waste.

Asbestos waste will not be left unattended and will be removed from site immediately and transported directly to the waste transfer station.

Asbestos waste will be transported using an appropriate vehicle with a lockable compartment that is separate to the driver cabin. The maximum amount of mixed asbestos waste that can be carried without a waste carriers' licence is 333kg. Derby Homes will not exceed this limit. If asbestos work is likely to create more waste, then 333kg a licensed contractor will be used who may arrange for a lockable asbestos skip to be delivered and collected from site.

Derby Homes has an asbestos waste transfer station at the London Road Depot which is owned by Derby City Council and managed by the WAMITAB Responsible Person. All asbestos waste created by Derby Homes staff will be taken to the waste transfer station. An acceptance form and Derby Homes internal waste consignment note will be created and kept in a central file kept by the WAMITAB Responsible Person for all asbestos waste brought to the waste transfer station. The acceptance forms will be collected on a weekly basis by Derby City Council and then emailed over quarterly to the Asbestos Manager at Derby Homes. The asbestos skip will be emptied when required by an approved carrier and the waste consignment note will be sent to Derby City Council.

Licensed asbestos removal contractors are responsible for disposal of their own waste and are not permitted to use Derby Homes waste transfer station.

9.7 Fly Tipped Asbestos

All suspect fly tipped asbestos should be treated as asbestos waste. The risk of further damage by leaving the materials while testing is conducted far outweighs the potential financial risk that the material may not be asbestos. Small amounts of low-risk non-licensed materials e.g., asbestos cement and asbestos floor tiles (no more than the equivalent of a single garage roof) will be collected by Derby Homes Estate Management Teams. Larger amounts, contaminated soil and waste that is suspected to be either licensed asbestos materials, notifiable non-licensed materials (asbestos textured coating and asbestos cement significantly damaged by crushing, fire, flooding, deterioration of matrix or heat) or asbestos insulating board will be removed by licensed contractors.

9.8 Analytical Services

All licensed asbestos activities and higher risk non-licensed tasks will require some form of air testing to show that the area is safe to be re-occupied. When an analyst is required, they will be appointed directly by Derby Homes to avoid any conflicts of interest between the removal contractor and the analytical consultant.

All consultants used for analytical purposes will be from a UKAS accredited (ISO 17025) organisation, have practical experience provided through supervised training and hold the proficiency certificate BOHS P403 Asbestos Fibre Counting or equivalent and if conducting four stage clearances BOHS P404 Air Sampling and Clearance Testing of Asbestos or equivalent. All analytical services should be carried out in accordance with Asbestos: The analysts' guide for sampling, analysis, and clearance procedures HSG248.

A copy of any air testing certification will be provided to Derby Homes to be held in the Asbestos folder. The analyst will have a duty of care to report any non-compliances and issues during the removal process to Derby Homes.

9.9 Register Update

Following asbestos removal, enclosing, or encapsulation works an Asbestos Register Update Form (see appendix) will be completed. This will be used to update Open Housing to ensure the information on the register is up to date.

10. Management of contractors

10.1 Asbestos Contractors

Asbestos consultants and contractors are integral to Derby Homes achieving its asbestos strategy. It is therefore important for Derby Homes to develop a good working relationship with all contractors. This will be achieved through regular meetings where performance and issues from either party can be discussed; continued communication and simple forms for processing work orders and feeding back asbestos register information.

All asbestos contractors commissioned by Derby Homes will have regular audits carried out internally, ensure compliance with current asbestos regulations and other relevant health and safety legislation and best working practice.

Re-inspection of asbestos surveys will be conducted to assure quality standards and compliance with CAR 2012 and relevant asbestos HSE guidance.

Derby Homes will carry out checks of staff qualifications and competence
and annual checks of company licence and insurance documentation to ensure compliance.

All asbestos contractors are expected to follow the terms of their contract at all times and any complaints should be dealt with promptly.

10.2 Non-Asbestos Contractors

All contractors commissioned by Derby Homes will be required to present current asbestos training certificates appropriate for the work they are conducting. In most cases asbestos awareness training will be sufficient. Contractors will also be asked to

provide method statements and risk assessments in relation to asbestos prior to commencing works including an emergency asbestos procedure for when suspect ACMs are discovered or disturbed.

Existing contractors will be asked to provide asbestos training certificates, method statements, risk assessments and emergency procedure on an annual basis.
All contractors are expected to follow the terms of their contract at all times and any complaints should be dealt with promptly.

11. Construction design and management (CDM) 2015 compliance

CDM 2015 affects all construction contractors and those employed by Derby Homes will be subject to these regulations.

As a commercial client Derby Homes will make suitable arrangements for managing the project, including making sure:

- other duty holders are appointed as appropriate.
- sufficient time and resources are allocated
- relevant information is prepared and provided to other duty holders including asbestos surveys and inspections.
- the principal designer and principal contractor carry out their duties
- welfare facilities are provided (contractors will be permitted to use welfare facilities at Derby Homes depots but must ask tenant permission before using any of their facilities).

Licensed asbestos removal contractors will usually take the role of contractor and will be required to

- Plan, manage and monitor construction work under their control so it is carried out without risks to health and safety.
- Prepare a construction phase plan.

12. Emergency procedure

12.1 Discovery of Suspected ACMs

If a material is suspected to contain asbestos and it is not detailed on Open Housing or other surveys recently conducted, then the Discovery of Suspected Asbestos procedure flow chart should be followed (see appendix).

12.2 Damage to Known or Suspected ACMs

If a material is damaged that is known or suspected to contain asbestos, then the Damage to Asbestos Containing Materials procedure flow chart should be followed (see appendix).

There is also an Out of Hours procedure (see appendix) for staff and an emergency kit available, stored in a container located at Wolseley Merchant, on Ascot Drive, to be used outside Derby Homes normal office hours of Monday to Friday 8am to 5pm. After 9pm and at weekends the Out of Hours contractor will be responsible for management of any emergency situations; however as with all contractors they must report any incidents to the Out of Hours Manager who will in turn pass on details to the Asbestos Manager for inclusion in the Emergency Procedure Record.

12.3 Contractor Emergency Process Contractors checked for suitability

At appointment stage the asbestos emergency procedures of all contractors will be checked for suitability by the Asbestos Manager or a member of the Health and Safety Team. Contractors will be expected to follow their approved procedure in the event of an asbestos emergency. Contractors should report any such incidents to the Asbestos Manager in the first instance, and if not available any member of the Health and Safety Team, to determine a course of action for any tenants that may be affected and update the Emergency Procedure Record.

12.4 Health Surveillance

Health surveillance of employees will not be conducted on a routine basis as this is not required for the limited non-licensed work carried out however, where an employee has been inadvertently exposed to an uncontrolled release, health advice will be provided, and a note kept on the individual's personal file. If it is suspected that exposure will have exceeded the control limit (0.1f/cm^3), adequate medical surveillance will be provided as prescribed in CAR 2012. A suitable health record will be kept for at least 40 years. In such incidences it may also be necessary to report the incident to the HSE under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR) via an electronic submission on the HSE website. Additionally, if a member of staff who works with asbestos is diagnosed with an asbestos related cancer e.g., mesothelioma while employed at Derby Homes this will be reportable under RIDDOR. Retired employees who develop asbestos related cancers will not be reportable under RIDDOR but will be investigated by Derby Homes to determine possible asbestos exposure incidences during employment and ensure existing procedures fully protect current employees.

13. Communication, implementation, monitoring and review of asbestos management policy, plan and procedures

13.1 Communication

Derby Homes will ensure that the Asbestos Management Policy, Plan and Procedures are made available to all employees, contractors and other stakeholders.

Derby Homes will:

- tell employees what the management plan arrangements are;

- provide access to the plan in the controlled documents section of DH net

- provide the emergency services with information on the location and condition of any known ACMs;
- make available copies of the management plan for employee representatives and trade union safety representatives.

13.2 Implementation

To implement the content of this plan and continually improve management of asbestos an Asbestos Management Action Plan has been created. This plan contains all actions that are required to effectively manage asbestos at Derby Homes.

13.3 Monitoring and Review

Approved Code of Practice L143 Work with Materials Containing Materials suggests annual review of the Asbestos Management Plan however Derby Homes will follow the guidance of HSG227 a comprehensive guide to Managing Asbestos in premises and review the plan every 6 months. The purpose of the check is critically reviewing all the management processes and their effectiveness as well as the overall progress made against implementation plans. The following aspects will be reviewed.

Effectiveness of current management plan:

- in preventing exposure;
- in controlling maintenance workers/contractors;
- in highlighting the need for action to repair/remove ACMs;
- in raising awareness among all employees.

Issues which may affect the management plan, including:

- changes to the organisational structure and/or staff;
- resourcing the management plan;
- changes to company procedures; and
- changes in building use/occupancy/refurbishment plans.

Instances of failure of the procedures, for example:

- where procedures have not been followed and why not;
- where procedures have been inadequate and why;
- where exposure to airborne asbestos fibres has occurred