



ASBESTOS MANAGEMENT POLICY AND PLAN

This Asbestos Management Policy and Plan sets out the Council's policy, management plan and procedure for managing asbestos in its housing stock and sites which fall under the responsibility of the Housing Service.

2024

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1. INTRODUCTION

- 1.1. This document sets out Dartford Borough Council's ('The Council') Policy, Management Plan and Procedure for managing asbestos. This Management Plan details the approach that will be adopted by the Council with regard to the day to day management of asbestos in the Council housing stock, and any sites or operations which fall under the responsibility of the Housing Service of the Council.
- 1.2. The Council is the Duty Holder in Council owned and maintained properties or where the Council is responsible for the maintenance of the property. As the Duty Holder, the Council has adopted a pro-active approach to asbestos and its control in order to ensure the safety of Council employees, contractors, tenants and anyone else who may be affected by the Council's undertakings in this regard.
- 1.3. This Policy has been produced in accordance with health and safety legislation and applicable regulations and guidance, as set out in section 2. The Control of Asbestos at Work Regulations 2002 (updated in 2012) introduced a specific duty to manage the risk from asbestos containing materials (ACMs) in non-domestic premises. All common areas of domestic Council properties fall within the scope of this legislation.
- 1.4. Housing Services is also responsible for the maintenance and repairs for the Council's domestic premises, and does this in accordance with current legislation (see section 2), ensuring the Council's statutory obligations and duties are met. This includes maintaining an asbestos register which indicates where known or suspected asbestos containing materials have been located and their generic type.
- 1.5. The Council is committed to protecting the health, safety and welfare of its employees and others who may be affected by the Council's undertakings. It is therefore essential that employees and those who undertake work on behalf of the Council adhere to the requirements of this Policy, Management Plan and Procedure.

2. LEGISLATION AND REGULATORY FRAMEWORK

- 2.1. The Policy and its delivery is intended to be compatible with the following legislation and regulation:
 - **The Health and Safety at Work etc. Act 1974** – The Council, as an employer, must ensure the health, safety and welfare at work of its employees as far as is reasonably practicable. The Council is also required to ensure those not in its employment are not exposed to any risk of health and safety.
 - **The Management of Health and Safety at Work Regulations 1999** – The Council, as an employer, should make a suitable and sufficient assessment of risks to its employees and those affected by its undertakings.

- **The Control of Asbestos Regulations 2012** – Work with asbestos materials is strictly controlled by the Control of Asbestos Regulations 2012 (CAR) and apply to all work with asbestos. The Regulations require an assessment to be made by a competent person with respect to the likely exposure to employees before starting any work with asbestos or where asbestos is present.
- **Workplace, Health and Safety Welfare Regulations 1992** – The workplace should be maintained in an efficient state, in efficient working order and in good repair.
- **Occupiers' Liability Act 1957** – The occupier of a premises owes a duty of care to all visitors in respect of dangers due to the state of the premises or to things done or omitted to be done on them.

The Policy and its delivery is also intended to be compatible with the following guidance:

- HSE L143 Managing and working with asbestos
- HSG264 Asbestos: The Survey Guide
- HSG248 Asbestos: The Analysts' Guide
- HSG247 Asbestos: The Licensed Contractors' Guide
- HSG227: A comprehensive guide to managing asbestos in premises

3. POLICY STATEMENT

3.1. Asbestos Policy and Statement of Intent

This document describes the arrangements in place across the property portfolio of Dartford Borough Council to ensure the exposure to asbestos is prevented as far as reasonably practicable.

The Council acknowledges and accepts its responsibilities under the relevant legislation listed above. Where appropriate, approved Codes of Practice and guidance information published by the Health and Safety Commission and Executive shall be taken as the adopted standard.

The Council is aware of its legal duty to identify and record the location and condition of asbestos and presumed asbestos containing materials (ACMs), assess the risks from such materials and formulate a management plan to reduce those risks.

The Council is aware of its responsibilities to safely manage retained ACMs within premises under their control and to liaise with others in premises which they own that are under the control of others.

The Council shall ensure that its site staff receive training appropriate to their role.

No new or replacement materials containing asbestos will be used in premises owned by the Council.

3.2. Asbestos Management Plans

Premises occupied by the Council have an Asbestos Management Plan in place (see Appendix 1). The Plan will look at the risk assessment undertaken for the ACMs on the premises and sets out what is going to be undertaken, and when. It includes clear lines of responsibilities and mechanisms for regular monitoring and review. The type of information which should be included is listed below (based on HSG 227: '*A comprehensive guide to managing asbestos in premises*')

- Details of how the location and condition of ACMs is recorded
- Priority assessments
- A table of priority for action
- Decisions about management options and rationale
- A timetable for action
- Monitoring arrangements
- Employees and their responsibilities
- Training arrangements for employees and contractors
- A plan of implementation for new procedures, including those for external contractors
- The mechanisms for passing information about the location and condition of ACMs to all those who may need it
- Who will oversee the quality of the entries made on the management plan
- A procedure for review of the plan, including a timetable

4. **RESPONSIBILITIES**

4.1. Duty Holder

The Council's Head of Housing will in most circumstances act as the Duty Holder. Individual Site or Area Managers, together with any other organisation or persons designated as the Duty Holder will have a direct impact into the effective application of this Management Plan and therefore are responsible for compliance.

A Duty Holder is as described in the CAR 2012 Regulation 4 as:

- Every person who has, by virtue of a contract or tenancy, an obligation of any extent in relation to the maintenance or repair of non-domestic premises or any means of access thereto or egress there from; or
- In relation to any part of non-domestic premises where there is no such contract or tenancy, every person who has, to any extent, control of that part of those non-domestic premises or any means of access thereto or egress there from.

The Duty Holder will ensure that:

- The Asbestos Management Plan and subsequent action plan is implemented for all Council owned or controlled premises including a current asbestos register of all known or suspected ACMs;
- That the content of the Asbestos Management Plan and action plans are communicated to all those who may through their work activity disturb any ACM;
- Ensure that the Asbestos Management and action plan are reviewed at regular intervals and monitor its effectiveness.

In any premises where the Council is not the Duty Holder, e.g. where the landlord retains the Duty Holders responsibility and the Council is a minor occupier, the Council will ensure that adequate mechanisms are in place to check that the Duty Holder for the site is effectively meeting the requirements of the Control of Asbestos Regulations 2012 (Rev 2).

This will include:

- The identity of the Duty Holder
- Obtaining copies of the site asbestos register
- Obtaining copies of the asbestos management plan
- Ensure adequate lines of communication are installed to report damage to suspected ACMs and any proposed work to be undertaken in the building.

4.2. Responsible Person

The nominated Responsible Person will:

- Hold copies of the relevant management and action plans for all sites under their control;
- Act as the emergency contact point for their sites and hold a list of competent asbestos contractors to deal with emergency works;
- Be responsible for ensuring contractors on site are given access to the asbestos register;
- Ahead of any work that might disturb asbestos, make an assessment of whether available asbestos information is suitable and sufficient to support the planned work, and where it is not, commission a suitable refurbishment and demolition survey for the relevant areas/elements of the building and communicate this information to the contractor.

The Council will:

- Ensure that the asbestos register is updated as necessary following damage, maintenance or building work, repair removal and routine monitoring of the condition of the ACMs;
- Maintain all documentation relating to asbestos including: air monitoring, disposal notes etc.;
- Hold an up to date copy of the asbestos register, management and action plan and make sure it is readily available at all times to whoever may need it;
- Check that any and all staff working in such areas have asbestos awareness training and that any staff working on asbestos materials hold Category B

Asbestos Practical Training if the work is non-notifiable, non-licensed work, or notifiable, non-licensed work (NNLW) and that suitable insurance covering this work is held by the contractor;

- Monitor the condition of known or suspected ACMs on their premises;
- Ensure asbestos contractors undertake all work where asbestos is likely to be disturbed;
- Issue permit to work or permit to enter where proposed work is in an area containing asbestos;
- Label ACMs and ensure the maintenance of these labels;
- Appoint contacts for staff to report damage to suspected ACMs.

4.3. Site Management Staff

All Site Managers and their staff have a responsibility:

- To notify the Responsible Person if they have any reason to suspect that the asbestos or ACMs have been disturbed;
- To comply with any procedures put in place locally to ensure that the risks posed to their health by any exposure to ACMs are adequately controlled.

4.4. Survey Programme

There are two types of asbestos survey available:

- **Management Survey:** The main aim of this survey is to assist in producing an asbestos register and an asbestos management plan. The survey helps to manage ACMs during normal occupation and use of the premises. It is visual with sampling (non-intrusive, non-destructive), and can be presumptive.
- **Refurbishment/Demolition Survey:** This survey must locate and identify ACMs before any structural works begins at the premises or on equipment. It is intrusive with sampling and provides comprehensive authoritative data. The survey is required prior to structural alterations or demolition.

All planned further surveys of building structures and services will be completed with a minimum of a Management Survey.

A substantial number of residential properties under the control of the Council have already had full asbestos Type 2 (MDHS 100) or Management Surveys undertaken, and form a part of the Council's asbestos register, although this is not a requirement and does not fall within the scope of the Control of Asbestos Regulations 2012 (Rev 2).

Communal areas shared by multiple properties fall under regulation 4 of the Control of Asbestos Regulations and these are treated differently to domestic properties. Where applicable these properties require continued re-inspection.

4.5. New Properties and Disposals

Newly acquired and leased properties will also fall under the scope of this Policy. The vendor or landlord must provide the Council with sufficient information, for example, drawings and surveys, to establish whether asbestos containing materials are present.

If an asbestos survey (Management or Refurbishment/Demolition) has not been carried out, one should be arranged via the Council prior to acquisition or lease.

Asbestos survey information for any estate being disposed of will be provided to the purchaser as part of the sale.

5. RISK ASSESSMENT PRINCIPLES

5.1. Surveys will be carried out in accordance with HSE Guidance 'Asbestos: The survey guide HSG264', and unless the pre-survey risk assessment stipulates otherwise, a management survey will be sufficient for the development of the premises management plan.

5.2. Risk Assessment – Material and Priority Assessment

(Information in this Annex is taken from 'A comprehensive guide to managing asbestos in premises HSG 227')

The risk assessment includes a material assessment and a priority assessment. The material assessment looks at the type and condition of the ACM and the ease with which it will release fibres if disturbed. The priority assessment looks at the likelihood of someone disturbing the ACM.

Step 1 – Material Assessment

The survey should provide the material assessment with the survey report. Each ACM will be scored and ranked in order of the ability to release fibres in the event of it being disturbed in some way. This will give a good initial guide as to the priority for management; however, the factors considered in the priority assessment also need to be taken into account.

HSG 264 ('Asbestos: The survey guide') recommends the use of an algorithm to carry out the material assessment. The algorithm used in HSG 264 considers four parameters that determine the risk:

- Product type
- Extent of damage
- Surface treatment
- Asbestos type

Each of these are scored and added to give a total score of between 2 and 12:

- Scores of 10 or more are high risk
- Scores of 7 to 9 are medium risk

- Scores of 5 to 6 are low risk
- Scores of 4 or less are very low risk material

The material assessment algorithm shown in HSG 264 is reproduced here.

Sample Variable	Score	Example of Scores
Product Type (or debris from product)	1	Asbestos reinforced composites (plastics, resins, mastics, roofing felts, vinyl floor tiles, semi rigid paints or decorative finishes, asbestos cement etc.)
	2	Asbestos insulating board (AIB), millboards, other low-density insulation boards, asbestos textiles, gaskets, ropes and woven textiles, asbestos paper and felt
	3	Thermal insulation (e.g. pipe and boiler lagging), sprayed asbestos, loose asbestos, asbestos mattresses and packing
Extent of Damage/Deterioration	0	Good condition: no visible damage
	1	Low damage: a few scratches or surface marks: broken edges on boards, tiles etc.
	2	Medium damage: significant breakage of materials or several small areas where material has been damaged revealing loose asbestos fibres
	3	High damage or delamination of materials, sprays and thermal insulation. Visible asbestos debris
Surface Treatment	0	Composite materials containing asbestos: reinforced plastics, resins, vinyl tiles.
	1	Enclosed sprays and lagging, AIB (with exposed face painted or

Sample Variable	Score	Example of Scores
		encapsulated), asbestos cement sheets etc.
	2	Unsealed AIB, or encapsulated lagging and sprays.
	3	Unsealed AIB, or encapsulated lagging and sprays
Asbestos Type	1	Chrysotile
	2	Amphibole asbestos excluding Crocidolite
	3	Crocidolite

Score	Potential to release asbestos fibres
10 or more	High
7-9	Medium
5-6	Low
4 or less	Very Low

Step 2 – Priority Assessment

Management priority must be determined by carrying out a risk assessment which will take account of the material assessment and factors such as:

- Maintenance Activity – The frequency of maintenance activity (planned & unplanned) needs to be taken into account.
- Occupant Activity – The activities undertaken in the area need to be investigated.
- Likelihood of Disturbance – The accessibility/vulnerability of the ACM needs to be looked at.
- Human Exposure Potential – Looking at the number of people in the area, the frequency of use of the area, and the average time each area is in use.

The algorithm on the next page should be used to produce priority assessments (Taken from '*A comprehensive guide to managing asbestos in premises HSG 227*'). Four general headings have been used and one or more factors can be taken into account and averaged under each heading to suit the circumstance. If you choose to use more than one factor under a general heading, then average the scores under that heading, rounding up where necessary.

The resulting scores will enable the management of ACMs to be prioritised and some will require immediate action. In all cases the following actions will be required:

- Communicate with employees, contractors and others;
- Monitor the condition of the ACM;

- Put a safe system of work in place.

Options for managing the condition of the ACMs:

- Label the ACM
- Colour coded wall plaque of ACMs (within common areas/common parts of low rise blocks)
- Colour code the ACM
- Protect/enclose the ACM
- Seal/encapsulate the ACM
- Repair the ACM
- Remove the ACM

Appendix 5 of 'A Comprehensive Guide to Managing Asbestos in Premises HSG 227' gives a series of flowcharts to help make a decision for choosing the options above.

Priority Assessment Algorithm

Assessment Factor	Score	Examples of Variables
Normal Occupant Activity Main Type of Activity in Area	0	Rare disturbance activity (e.g. little used store room)
	1	Low disturbance activity (e.g. office type activity)
	2	Periodic disturbance activity (e.g. industrial or vehicular activity which may contact ACM's)
	3	High level of disturbance (e.g. fire door with asbestos insulating board sheet in constant use)
	As Above	As above
Secondary Activities for Area		
Likelihood of disturbance		
Location	0	Outdoors
	1	Large rooms or well ventilated areas
	2	Rooms up to 100m ²
	3	Confined Space
Accessibility	0	Usually inaccessible or unlikely to be disturbed
	1	Occasionally likely to be disturbed
	2	Easily disturbed
	3	Routinely disturbed

Assessment Factor	Score	Examples of Variables
Extent/amount	0	Small amounts or items (e.g. strings, gaskets)
	1	<10m ² or <10LM pipe run
	2	>10m ² to <50m ² or >10LM to <50LM pipe run
	3	>50m ² or >50LM pipe run
Human Exposure Potential		
Number of occupants	0	None
	1	1 to 3
	2	4 to 10
	3	>10
Frequency of use of area	0	Infrequent
	1	Monthly
	2	Weekly
	3	Daily
Average time area is in use	0	<1 Hour
	1	>1 Hour <3 Hours
	2	>3 to <6 Hours
	3	>6 Hours
Maintenance Activity		
Type of Maintenance Activity	0	Minor disturbance (e.g. possibility of contact when gaining access)
	1	Low disturbance (e.g. changing light bulbs in asbestos insulating board)
	2	Medium disturbance (e.g. lifting one of two asbestos insulating board ceiling tiles to access a valve)
	3	High levels of disturbance (e.g. removing a number of ceiling tiles to replace a valve or re-cabling)
Frequency of Maintenance Activity	0	ACM unlikely to be disturbed for maintenance
	1	<1 per year
	2	>1 per year
	3	>1 per month
Total Score		

Worked Example of a Priority Assessment

Priority assessment for asbestos insulation board ceiling tiles in the control room			
Assessment Factor	Variable Selected	Score for Each Variable	Overall Score
Normal Occupant Activity Main type of activity in the area	Low Disturbance Activities	1	1
Likelihood of Disturbance Location Accessibility Extent/Amount	Room up to 100m2 Occasionally likely to be disturbed >50m2	2 1 3	Average =2
Human Exposure Potential Number of occupants Frequency of use of area Average time area is in use	1-3 Daily >6 Hours	1 3 3	Average = 2
Maintenance Activity Type of maintenance activity Frequency of maintenance	Low disturbance >1 per year	1 2	Average = 2
Total priority assessment score			7
Material assessment score (supplied by surveyor)			6
Total of material and priority assessment scores			13

6. COMPLAINTS

- 6.1. If tenants are not satisfied with the service they have received, the Council's [Corporate Complaints Procedure](#) can be followed. Complaints leaflets are also available from the Council offices.
- 6.2. The [Housing Ombudsman](#) can be contacted if further advice and support is needed on making a complaint to the Council.

7. DATA PROTECTION

- 7.1. The UK GDPR and the Data Protection Act 2018 regulate the processing of information relating to individuals, which includes the obtaining, holding, using or disclosing of such information.
- 7.2. The Council needs to collect and use certain types of information about its tenants in order to carry out its everyday business and to fulfil its objectives and its statutory functions.
- 7.3. The Council's:
 - [Data Protection Policy](#) sets out how it will protect special category and criminal convictions personal data;
 - [Housing Services \(Landlord and Tenant\) Privacy Notice](#) explains that the Council collects personal information to administer its housing (landlord and tenant) services.

8. EQUALITY AND DIVERSITY

- 8.1. The Council is committed to welcoming and valuing diversity, promoting equality of opportunity and tackling unlawful discrimination in accordance with the Equality Act 2010. The Council, in delivering this Policy, will have regard to the Public Sector Equality Duty and ensure that no individual is discriminated against based on their sex, sexual orientation, marital status, pregnancy and maternity, gender reassignment, race, religion, belief, disability or age.
- 8.2. The Public Sector Equality Duty is a duty on the Council and that responsibility cannot be delegated to a contractor/service provider and is a continuing duty.
- 8.3. This Policy has been subject to a [Customer Access Review](#), to assess the impact it will have on equality. The review found that there are no known circumstances where the Policy will have a disproportionate impact on the protected characteristics as the Policy and Plan provides the same level of protection for all building users.

9. MONITORING AND REVIEW

- 9.1. This Policy will be reviewed every three years or earlier to address legislative, regulatory, best practice or operational issues.

APPENDIX 1

SPECIFIC ASBESTOS MANAGEMENT PLAN FOR DARTFORD BOROUGH COUNCIL

- a) The Control of Asbestos Regulations 2012 (Rev 2) and the Council's Management of Asbestos Policy set the framework within which this Asbestos Management Plan operates. The framework sets out the aims, individual responsibilities and general procedures for managing asbestos risk and this document must be referred to at all times in the development and review of this management plan.
- b) This management plan is specific to Dartford Borough Council and aims to ensure that all known or presumed asbestos containing materials (ACMs) within the premises are managed to effectively prevent exposure to the hazards associated with asbestos. It details all assessments made of ACMs, and will give recommendations, priorities and deadlines for action.
- c) Identification and location of ACMs – Asbestos Register

The asbestos register for the Council is compiled from the Type 2 (MDHS 100) & Management Surveys (undertaken by consultants, in accordance with HSG 264 'Asbestos: The survey guide'). The register lists the type and location of ACMs and makes a material assessment of the risk.

A priority assessment has been undertaken based on the outcome of the material assessment and with due consideration of the additional factors of occupant activity, likelihood of disturbance, human exposure potential and maintenance activity. The resulting assessment makes prioritised recommendations for action (for example, removal, repair, sealing, regular re-inspection etc.)

- d) Location of Asbestos Register

The Council has in place a frontline data recording system for the asbestos register which is located at The Civic Centre, Home Gardens, Dartford, Kent, DA1 1DR. The contact details for enquiries regarding the asbestos register is the Senior Repairs Officer, Mr Chris Knight – 01322 343044.

- e) Responsibility for Updating the Register

The asbestos register will be updated by the Council's nominated Asbestos Surveying Consultant following removal, repair or change in condition etc. of any ACM. Any additional copies of the register must be updated at this time.

- f) Provision of Information

Provision of Proposed Minor/General Maintenance Works:

The Council will provide details of any asbestos survey of the property, and will make tenants/building occupiers aware of the possible presence of asbestos materials. If this information is not available, a management asbestos survey should be commissioned as appropriate.

Restrictions on permissible maintenance by tenants or occupiers will be communicated.

All partnering contractors have access to the asbestos register online. All new contractors are provided access as part of their on-boarding process. All contractors are conversant in the use of the asbestos register. Where applicable, asbestos register details will be provided as part of the construction health and safety plan; this will be provided by the Construction Design and Management Co-ordinator for the project. If the existing asbestos register and survey data is not deemed suitable and sufficient to safely undertake general repairs and maintenance to the home, then to support any works a pre refurbishment/demolition survey should be commissioned.

g) Provision of Proposed Major/Capital Works:

For major refurbishment projects, in addition to the requirement for prior notification, it is the responsibility of the Project Co-ordinator to liaise with the Council to provide and collate all necessary information.

Where the Construction (Design and Management) Regulations 2015 require the production of a pre-contract information document, relevant information on the presence of known asbestos containing materials must be included. If this information is not available or suitable and sufficient, a management or pre refurbishment/demolition survey should be commissioned as appropriate.

h) Labelling of ACMs

Where asbestos is known or suspected as indicated in the asbestos register within non-domestic properties, this would be labelled with an appropriate asbestos warning sign. The absence of any labels indicating asbestos is not proof that asbestos is not present.

Where asbestos is known or suspected as indicated in the asbestos register within common parts of low rise residential blocks and sheltered housing, this would be identified with an appropriate colour coded wall plaque usually fitted to the wall on the stairwell entrance or ground floor communal lobby to the block and to the lobby entrance of the sheltered schemes. The absence of any wall plaques indicating asbestos is not proof that asbestos is not present.

i) Contractors

The Council is responsible for ensuring that all contractors are advised of the details of all known ACMs within the location that they are to commence work. Relevant sections of the asbestos register must be given to the contractor prior

to the commencement of works, and preferably with tender documentation. Contractors will also be given details of action to be taken if further asbestos is suspected or encountered unexpectedly. Contractors must be informed of their responsibility to pass this information on to all or any sub-contractor under their control.

j) Staff

Staff will be made aware of the location of ACMs within the building that they work in if there is the potential to disturb them. Staff will also be given details of how to report any subsequent damage to ACMs.

k) Monitoring of ACMs

The condition of any ACM left in situ must be monitored and the results recorded. Remedial action must be taken if the condition of ACMs begins to deteriorate. The frequency of monitoring will vary dependent upon the risk posed by the ACM, i.e. its location, nature etc. Monitoring is undertaken as a visual inspection looking for signs of disturbance, scratches, broken edges, cracked or peeling paint and debris. Where deterioration has occurred, recommendations for appropriate action will be made.

The regular monitoring of the ACMs must be recorded within the register. The Council undertakes regular block inspections of common areas of its properties. These estate inspections are attended by Technical Officers and Housing Officers responsible for the management of each site.

An annual re-inspect of all common areas where we have known ACMs is completed on behalf of the Council by an Asbestos Consultant. The results of the inspection are recorded on the Council's asbestos register. Where no ACMs are found, following review, these blocks will be removed from the programme.

l) Training

Council Housing Service staff are to be provided with general awareness training which covers the following:

- Understanding the use of asbestos in buildings
- How to avoid exposure
- Action to be taken on finding suspected asbestos containing materials.

The aim of asbestos awareness training is to create an open and responsive culture where employees are not afraid of asbestos and know how the Council manage it in their place of work.

All Technical and Trades staff employed by the Council will be required to attend asbestos awareness training seminars. In addition, contractors employed by the Council will also be required to attend asbestos awareness training seminars.

Key employees will be suitably trained in implementing this Policy and in dealing with asbestos related issues.

For all key staff, Council training will include the following elements:

- That you can only be exposed to asbestos if the ACM is disturbed thereby releasing fibres into the air that you breathe;
- That asbestos in good condition should be left in place, reported, recorded and managed;
- That any exposure to asbestos should be avoided and that the risk increases as the level, duration and frequency of exposure increases;
- That the increased risk to health from a one-off accidental exposure is negligible and not a cause for concern;
- What to do if they find asbestos or a damaged material, which they think could contain asbestos;
- What to expect from maintenance employees and building operatives;
- That there is a sound understanding as to how to assess existing asbestos information to determine that it is suitable and sufficient for contractors/visiting staff.

Contractors, Maintenance and Building Operatives will be informed:

- Of the points listed above for 'all key staff';
- What asbestos products are and where you are likely to find them;
- That they should never work on any building material without first knowing whether it contains asbestos;
- Of the procedure to follow before starting any work where building materials are to be disturbed;
- Of the safe working methods for working on ACMs;
- What work they can and cannot do on ACMs.

m) Asbestos Incidents

Where accidental damage of suspected asbestos containing based materials takes place, the following action must be taken immediately:

1. Ensure the area is evacuated immediately. Close all windows and doors (where possible) to minimise fibre release and spread.
2. Contact the Housing Repairs Team on 01322 343800.
3. Do not enter the suspect area – it can only be entered by suitably trained personnel who are wearing appropriate personal protective equipment (PPE) & respiratory protective equipment (RPE).
4. If the incident occurred within a common part of a low rise residential block, the asbestos wall plaque for that block should be examined to determine the presence of asbestos.

5. If the incident occurred within any Council property, the asbestos register will be examined to determine the presence of asbestos.

6. If no record of the suspect material exists, samples will be taken by fully trained Asbestos Surveyors, and a UKAS accredited laboratory will carry out subsequent analysis for the Council. If necessary, an approved licensed contractor and Environmental Analyst will be appointed to make the area safe and undertake airborne monitoring to assess the extent of surface and airborne contamination.

7. Wait until the area is declared safe by the nominated Surveyor or Analyst.

A list of anyone accidentally exposed to asbestos fibres must be compiled and passed to the individual's employer. For Dartford Borough Council staff, the information must be detailed on the Council's accident reporting form and passed to the relevant line manager. This report should detail the exact nature and known extent of any exposure.

n) Review of the Management Plan

The Asbestos Management Plan will be formally reviewed by the Housing Maintenance Manager every 18 months and updated as necessary.

This review will include:

- Information contained in the asbestos register and update of it;
- The condition of ACMs remaining on site and inspection reports;
- Provision of information to contractor, consultants, staff etc.;
- Communication with all interested parties;
- Recording of incidents and accidents and lessons learnt;
- Incorporation of any changes in legislation and to look at implementing any amendments, recommendations or changes to working practices that may become necessary;
- Review the effectiveness of control measure, management actions and inspection regimes.

APPENDIX 2

RECOMMENDATION AND TIMETABLE FOR ACTION

This Action Plan has been designed with the sole purpose of managing the risk from asbestos containing materials (ACMs) identified within Council owned and occupied sites, so that as far as reasonably practicable no one can come to any harm from ACMs on their premises.

It should be noted that for the purpose of this Management Plan, all requirements are based on the materials and priority assessments added together.

a) No Asbestos Detected

Buildings that have been surveyed (Type2 (MDHS 100) or Management) and where no asbestos containing materials have been identified or suspected have been grouped here.

Whilst these areas require no further monitoring or inspection regimes, it is important that all records undertaken to date (i.e. survey, site drawings, etc.) are properly maintained and that all information regarding these areas is effectively disseminated by the Council to all building managers and employees.

Additionally, it is vital that areas outside of the survey scope are taken into consideration, for example, even after a type 2 or management survey has found no asbestos to be present, further assessment may still be needed if the fabric of the building is to be altered, or demolished, etc. Officers should assess the suitability and sufficiency of our asbestos survey information and where required complete a pre refurbishment/demolition survey. In addition it should be noted that no survey can categorically state that no asbestos is present within the fabric of the property given that limitations exist within all survey work.

b) Areas yet to be Surveyed and Areas of No Access

Surveys which have listed areas of 'No Access' (Type 2 (MDHS 100) or Management Survey) as well as buildings that have not yet been surveyed have been grouped here. In some cases, the asbestos register for a site will indicate that no asbestos containing materials have been identified, but there was a room, a wall, a ceiling void which was not accessible. These areas, distinct from those which would naturally fall outside of the survey scope, should be assumed to contain asbestos even if no other items are identified on the survey. Additionally buildings awaiting surveys must be presumed to contain asbestos containing materials until they are surveyed. Any site or areas which belong to the Council not mentioned should be presumed to be awaiting a survey.

Essentially, where there is a lack of concrete information, asbestos must be assumed to be present. An assessment must be carried out by a competent person prior to any access to, or disturbance of, these areas.

c) Areas which contain Asbestos

This category includes all presumed, strongly presumed and known asbestos containing materials identified within the building or site. This information is held within the asbestos report for each site. In turn, materials identified have been further categorised to aid the management of the risk posed from them.

d) High/Medium Risk Material

These materials present a medium to high risk rating, are a possible hazard to health in their current condition, and should be treated as a priority. It is

probable that items are damaged, unsealed or friable and require immediate remedial works to mitigate or reduce the risk posed. Sites which have had a type 1 (MDHS 100) survey may require a further assessment to confirm the presence of asbestos where it has been presumed or strongly presumed. Access to these areas should be centrally controlled or, where possible, restricted to ensure that no accidental disturbance of these materials occurs. A systematic programme should be undertaken to reduce the risk posed by ACM's identified in this category. It is likely that the remedial options for these items will include either encapsulation or removal. Initial recommendations are given within the asbestos register.

e) Low Risk Materials

These materials present a low risk rating and are possible hazards to health in their current condition. It is likely that these items have some minor damage, or require encapsulation or labelling, or some minor remedial actions to stabilise their condition or prevent further deterioration. Sites which have had a type 1 (MDHS 100) survey may require a further assessment to confirm the presence of asbestos where it has been presumed or strongly presumed. Access to these areas should be centrally controlled or, where possible, restricted to ensure that no accidental disturbance of these materials occurs. A systematic programme should be undertaken to reduce the risk posed by ACMs identified in this category. It is likely that the remedial options for these items will include either encapsulation or removal. Initial recommendations are given within the asbestos register.

f) Very Low Risk Material

These materials present a very low risk rating and are unlikely to pose a significant risk to health in their current condition. Items should be inspected and their condition assessed regularly. These items are likely to require minimal remedial actions. Initial recommendations are given within the asbestos register and are likely to include measures such as labelling all ACMs and keeping an up to date record of their location and condition.

APPENDIX 3

FREQUENCY OF MONITORING ACMS

a) Audits

The Management Plan requires that audit reviews be undertaken of not only the asbestos on the site but also the Management Plan itself.

b) The following is a guide:-

Asbestos Re-Inspections:

The effective management of any remaining asbestos in premises (often remedial/improvement work has been undertaken) requires regular auditing of its condition and the circumstances surrounding its condition, i.e. changes to properties which has or could damage the asbestos containing materials etc. These audits will be undertaken on a regular basis depending on the circumstances, for instance, the position and type of asbestos product. It will highlight any change or potential for change to the material and will be undertaken by the Council's current approved Asbestos Consultants/Surveyors. A report will be prepared of any changes and several actions to ensure:

- Details of changes are put into the register
- The priority assessment value is reviewed
- A programme in work required for remediation or removal is in place

The asbestos audits are to be undertaken in addition to the regular monthly block inspections that are already carried out by Council Technical Officers, Estates Officers and Council Handyman persons.

c) System Audits

This is broken down into three areas of audit:

- The system audit
- The audit of contractors and other specialists
- Audits on the standards of work

As a high level of asbestos knowledge is critical to these audits, they should be undertaken by external specialist asbestos consultants.

Timescales for Re-inspections

Low Rise Blocks	12 Months
Sheltered Housing	12 Months

d) The System Audit

A system audit will be carried out to review the effectiveness of the system. It will clearly look at the process and system in detail on a random number of sites (eventually covering all sites). The review will also look at the Management Plan itself and revise the system as appropriate in line with the HSE Control of Asbestos Regulations 2012 (Rev 2).

The audit will specifically look at:

- Update of registers
- Other reported details
- Remediation

- Effectiveness of communication
- Knowledge of employees to the system
- What information is available
- Effectiveness of adherence to the action plan and programme
- Training
- Risk assessment/Priority assessments
- Approved list of contractors
- Changes of legislation
- Record retention and record details

Any changes to the Management Plan will be made by the Council's Housing Maintenance Manager.

e) Audit of Contractors and Specialists

In order to assess as far as reasonably practicable the competence of any external contractor or specialist undertaking work on or with asbestos, a technical appraisal of that company will be undertaken. This will involve a review of their facilities and procedures and if possible, a visit to a nearby site of work. References will also be taken up of some clients on the standard of their past performance, accreditation, licences and insurance details will be obtained.

f) Standard of Work Audits

During and upon completion of work, especially with newly appointed contractors or specialists, an audit of their standards of work will be undertaken to ensure they have complied with not only legislation and guidance, but also to specifications and tenders. Any air monitoring undertaken will be reviewed to ensure the area is acceptable for further occupation. These can be undertaken by the Council's Senior Repairs Officer.

APPENDIX 4

JOB TICKETS TO WORK - ASBESTOS

a) Work with Asbestos

All work with ACMs shall be carried out in accordance with the requirements of the Control of Asbestos Regulations 2012 (Rev 2) and will be undertaken by licensed asbestos removal contractors.

Prior to any asbestos works being undertaken, a works specific job ticket must be issued by the Council to the contractor(s) who are carrying out the works.

b) Prior Works Notification / Job Ticket Scheme

Before a job ticket is raised the Council will ensure the contractor provides a detailed safety plan for the operations. This should include:

- Scope of the work
- Programme of work
- Proposed method of removal
- Waste Disposal
- RPE & PPE for operatives
- Air monitoring procedures (where applicable)
- Accident emergency procedures
- Probable duration of work
- Location of decontamination unit and waste skip

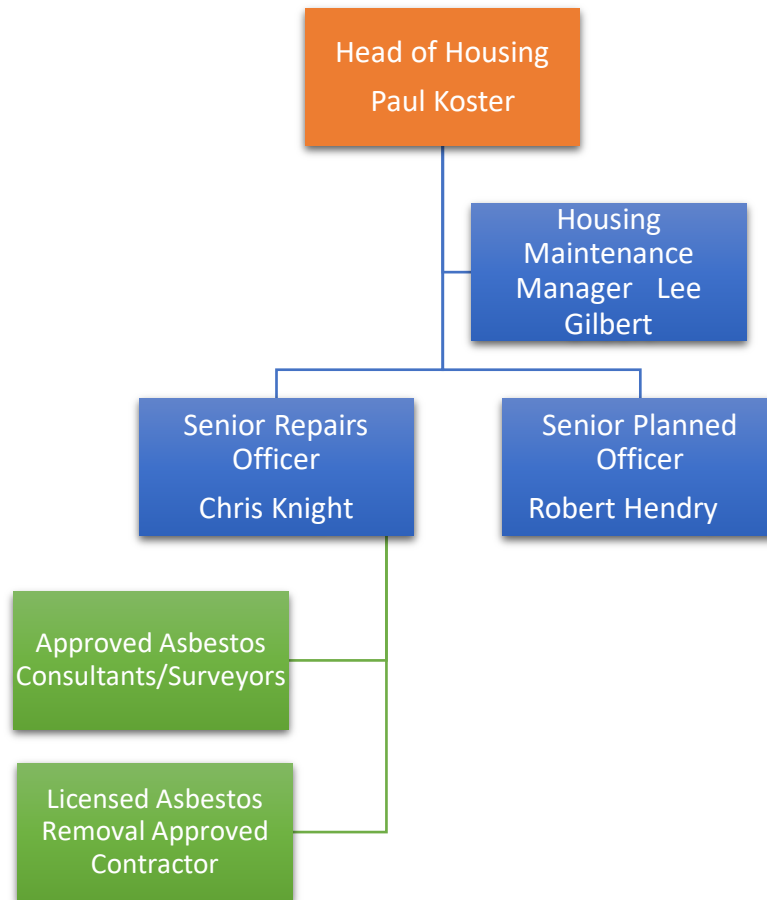
Prior to submitting the above documentation, Technical Officers should refer to the asbestos register and information including any existing site surveys. Where necessary further asbestos surveys will be conducted. This survey, and the property specific management plan, both of which incorporate details of the location and risk assessment of asbestos containing materials, should be made to available to relevant contractors, staff and tenants.

c) Completion of Licensed Works

Before the enclosures are dismantled the contractor must arrange for a four stage clearance to be carried out and issue the Council with a certificate of reoccupation.

APPENDIX 5

ASBESTOS MANAGEMENT RESPONSIBILITIES FLOW CHART



APPENDIX 6

EMERGENCY PROCEDURE

a) The Emergency Procedure

This emergency procedure aims to be compliant with an asbestos [best practice guide](#) published by the HSE.

If anyone suspects that an asbestos containing material has been disturbed then the following steps should be taken immediately.

- b) If material suspected of containing asbestos is damaged, then the area must be immediately vacated and anybody that could be affected must be warned. The windows should be closed and the door locked where possible. Anyone not needed to deal with the release should be excluded from the site and then

the Council Housing Repairs Team should be contacted by telephone immediately.

- c) Regain adequate controls as soon as is possible. If possible, place a warning sign stating "Possible Asbestos Contamination".
- d) The asbestos database will be checked to identify the material. Where asbestos is identified or the information is inadequate, the Council's Housing Services in consultation with the appointed Environmental Analyst, will undertake a risk assessment of the area which will include bulk sampling and reassurance air tests.
- e) If the material is found to be non-asbestos containing, the area will be reopened.
- f) Should the material be found to contain asbestos, a scope of work must be agreed with the Environmental Analyst, asbestos removal contractor and contract administrator for the Council to repair or remove the material as soon as possible.
- g) The Asbestos Removal Contractor and Environmental Analyst should be appointed using normal Council procedures if possible. The removal contractor will submit notification to the HSE where appropriate. The area should remain closed until the asbestos works are complete and the Environmental Analyst has issued the relevant clearance certificates. Consideration should be given to applying to the HSE for a waiver to undertake emergency works.
- h) It may be necessary to programme further asbestos removal works.
- i) All details of an incident must be recorded on an asbestos incident report form which must be completed on site and returned to Dartford Borough Council Housing Services. An assessment of the incident should be conducted and where appropriate to do so a RIDDOR incident notification made by the Council's responsible person.
- j) This will also enable the asbestos records to be updated.

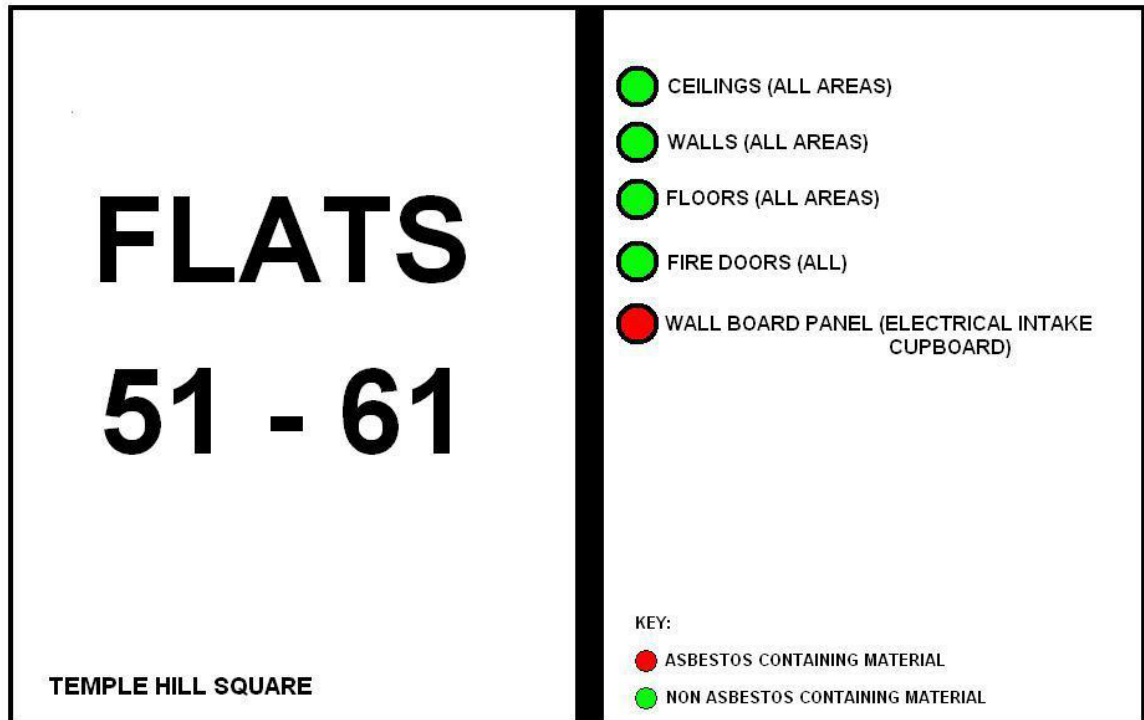
Emergency Contact Numbers:

**Housing Maintenance Manager
Lee Gilbert – 01322 343623 and/or the Duty Officer
Or
For Out of Hours Team between the hours of
17.15 & 08.45
01322 343800**

APPENDIX 7

LOW RISE BLOCK ASBESTOS WALL PLAQUE

a) Sample Low Rise Asbestos Wall Plaque



ASBESTOS CONTAINING MATERIAL



NON ASBESTOS CONTAINING MATERIAL

APPENDIX 8

ASBESTOS WARNING LABELS

- a) Sample Asbestos Warning Label



- b) Sample Asbestos Warning Label for ACMs Containing Blue Asbestos

