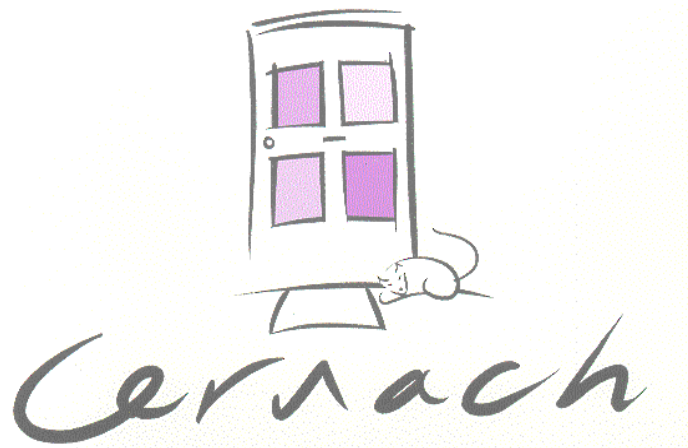


**CERNACH HOUSING ASSOCIATION
LIMITED**



MANAGEMENT OF ASBESTOS POLICY

Date Approved by Operations Sub-Committee:

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1. ASBESTOS POLICY STATEMENT

- 1.1 It is recognised that Cernach Housing Association (Cernach HA) has a duty under the Health and Safety at Work etc. Act 1974, as supported by subordinate legislation, to ensure, so far as is reasonably practicable, the health, safety and welfare of its employees, service users, contractors, the general public and others who may be affected by its undertakings.
- 1.2 It is also recognised that the management of asbestos related risk falls within the CHA's general responsibilities set out in point 1.1, above.
- 1.3 To this end, CHA will comply with the Asbestos Management duties defined and implied in the *Control of Asbestos Regulations 2012 (CAR12)*. It is the policy of Cernach HA to ensure that, as far as is reasonably practicable, no persons will be exposed to risks to their health due to exposure to any asbestos containing materials that may be present in any of the properties it owns, manages or occupies.
- 1.4 Cernach HA aims to:
- a) ensure the prevention of exposure to risks associated with asbestos containing materials.
 - b) ensure that any asbestos containing materials that may be present in any of its buildings are maintained in a condition so as to prevent the possibility of any harm to health occurring.
 - c) promote awareness of the risks from asbestos containing materials and the Association's Management Procedures through training and induction of relevant staff.
 - d) provide adequate resources to ensure the provision of appropriate information, instructions and training.
 - e) ensure a commitment to comply with all relevant asbestos legislation, Approved Codes of Practice, Health and Safety Executive Guidance Notes and to commit to the safe disposal of any asbestos waste in accordance with the appropriate legislation.
 - f) ensure that a representative proportion of properties built pre-2000 are subject to an Asbestos Management Survey Programme and an Asbestos Register for these buildings is prepared and maintained. This Register will undergo regular reviews and will be updated after any treatment and/or removal works have been undertaken.
 - g) ensure that an appropriate Asbestos Refurbishment or Demolition Survey strategy is in place in accordance with current legislation.
 - h) ensure only UKAS accredited asbestos consultancies are used for asbestos surveying works, asbestos air testing and asbestos analysis work.
 - i) implement an effective asbestos management strategy in order that appropriate measures such as encapsulation, labelling, inspection, working with, or removal of, asbestos containing materials can be undertaken.

- j) ensure that an appropriate system is installed, maintained and implemented for the management of all asbestos containing materials identified in the Register. Such a system is to be capable of recording the risk, the needs and priorities for treatment and/or removal.
- k) ensure that all Contractors and Sub Contractors engaged to carry out work on any of the Association's buildings are provided with adequate information on asbestos which may be disturbed by their works.
- l) ensure that information regarding the presence of asbestos is contained in tender documentation as may be appropriate.
- m) ensure Licensed Contractors and/or Sub Contractors carry out ALL Asbestos Licensable Works and Competent Contractors carry out ALL Asbestos Minor Works.
- n) ensure all Non-Licensed Contractors carrying out Asbestos Non-Licensable Works are trained in safe working procedures and have appropriate insurance cover for the work being carried out.
- o) ensure that relevant staff of the Association and local contractors are provided with appropriate training in this Policy.
- p) regularly review the Asbestos Management Policy

2. Equality and Human Rights

- 2.1 The Association's Equality and Human Rights policy, which was approved by the Committee in April 2021, outlines our commitment to promote a zero tolerance to unfair treatment or discrimination to any person or group of persons, particularly on the basis of any of the protected characteristics¹. This includes ensuring that everyone has equal access to information and services, and, to this end, the Association will make available a copy of this document in a range of alternative formats including large print, translated into another language or by data transferred to voice.
- 2.2 We are also aware of the potential for policies to inadvertently discriminate against an individual or group of individuals. To help tackle this and ensure that it does not occur, best practice suggests that organisations carry out Equality Impact Assessments to help identify any part of a policy that may be discriminatory so that this can be addressed (please see section 6 of the Equality and Human Rights policy for more information).

3 LEGISLATIVE & GOOD PRACTICE GUIDANCE

¹ The Equality Act 2010 identifies the "protected characteristics" as age, disability, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, gender reassignment and sexual orientation.

3.1 In developing this policy, cognisance was taken of the legislative requirements and good practice set out in the following documents.

- Health and Safety at Work Act etc. 1974
- Management of Health and Safety at Work Regulations 1999
- Control of Asbestos Regulations 2012
- The Construction (Design & Management) Regulations 2015 (CDM 15)
- Disposal of Asbestos Waste
- HSE Guidance INDG 223 A Short Guide to Managing Asbestos in Premises
- HSE Guidance HSG264 Asbestos: A survey guide
- HSE Guidance HSG227 Managing Asbestos in Premises

4. ASBESTOS RISK

4.1 The Association has considered the risks involved in failing to adhere to the policy, associated procedure and legal requirements when dealing with Asbestos Contaminated Materials and its management. Failure to correctly record and issue information on the location of ACMs appropriately deal with asbestos could result in cases not being appropriately managed. Failing to reduce the risks of asbestos to as low a level as reasonably practicable, could mean a failure to take account of the health & safety of residents, employees and contractors.

4.2 It is important to differentiate between the **REAL** risks associated with asbestos materials and the **PERCEIVED** risks, as incorrect perception of risk can often result in unwarranted concern over health risks. The **perceived** risk for asbestos is that 'one fibre can kill'. The **real** risk, as shown by the fairly recent work of Prof Seaton at Aberdeen and Prof Gibb at Cardiff, is that lungs from victims of asbestos related deaths generally contain in excess of 100million asbestos fibres at the point of death.

4.3 The serious diseases associated with asbestos are all diseases of the deep lung. To contract these diseases, fairly substantial quantities of asbestos have to be inhaled (note that medical/scientific data, as seen above, now exists in relation to dose-response relationships associated with asbestos exposure). The **real risks** associated with asbestos materials would not, therefore, simply depend upon its **presence** but on the **airborne concentration of fibres in the atmosphere and the duration of exposure**.

4.4 Therefore, the presence of an asbestos containing material in itself does not constitute a danger. However, there is a potential risk to health if such material is disturbed and damaged. An isolated accidental exposure to asbestos fibres for a short duration is extremely unlikely to result in the development of asbestos related diseases. However, **regular** exposure – even at relatively low levels – can present a risk as 'cumulative exposure' develops over time. As well as people employed in the building trades, inadvertent exposure (and consequent risk) can occur in other groups of people e.g. installers of I.T. systems, burglar alarms, smoke detectors, etc.

5. SCOPE

- 5.1 The Association operates a Health & Safety Management System, which comprises a broad range of documented policies, procedures and arrangements for the effective control of risks to the health, safety and welfare of employees and others who may be affected by the Association's undertakings.
- 5.2 This document forms part of the overall Management System and sets out the Association's specific arrangements for the management of Asbestos.
- 5.3 The policy set out within this document are intended to facilitate compliance with the asbestos related duties defined and implied in the *Control of Asbestos Regulations 2012*.
- 5.4 Cernach HA's stock profile includes 877 properties ranging from new built '1994' onwards and a transferred post war housing stock portfolio. Some buildings acquired by the Association were built or refurbished at a time when the use of asbestos containing materials in their construction was common. During work on these buildings it is possible, therefore, that personnel could disturb asbestos.
- 5.5 This Policy applies to the entire property portfolio under the control of Cernach HA to all operations carried on under its control **without exception**.

6. DUTY TO MANAGE ASBESTOS

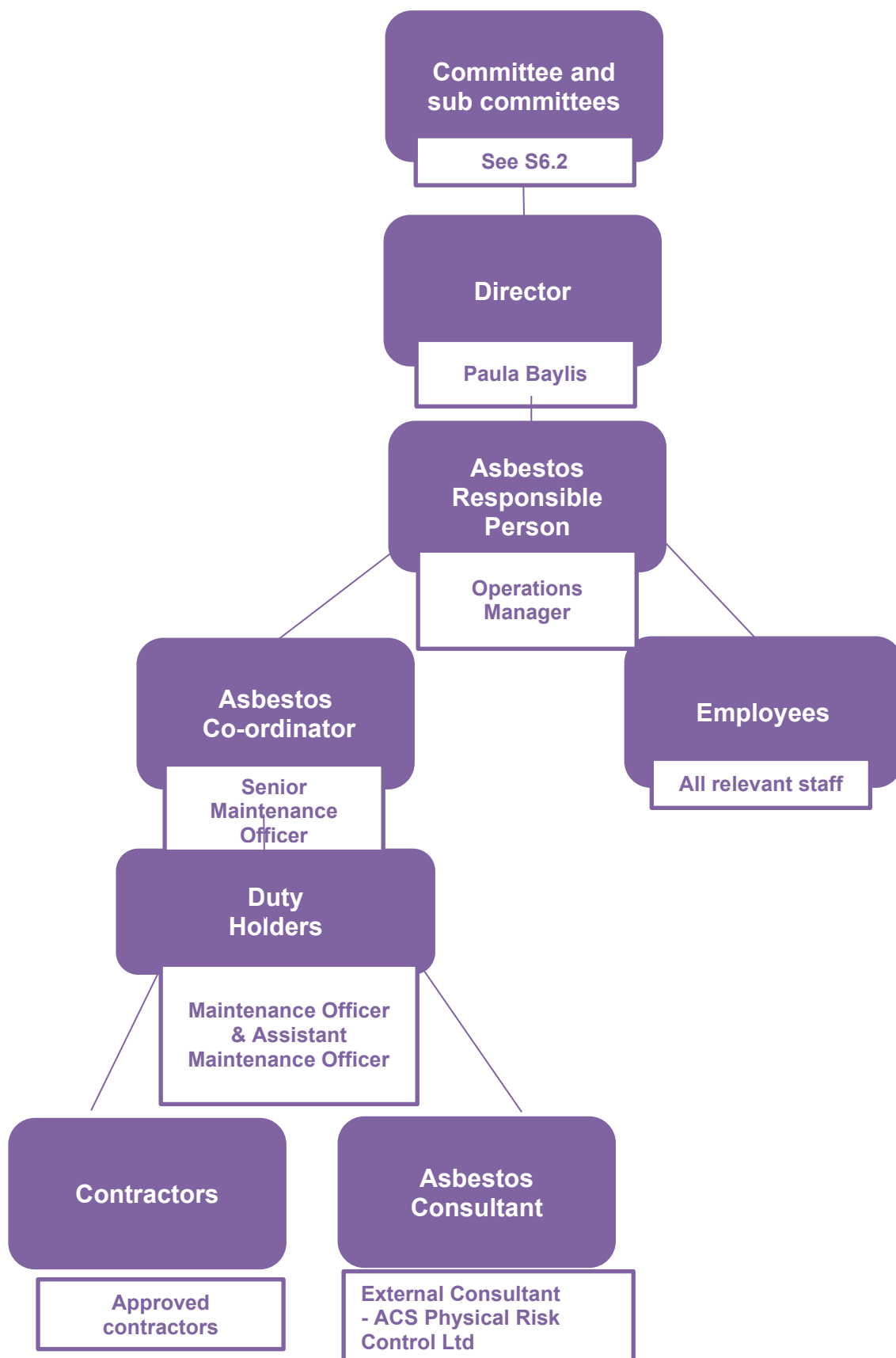
- 6.1 The Association recognises the duty imposed by Regulation 4 of CAR12 to 'manage' asbestos risks associated with normal occupancy in non-domestic premises and, in particular, the following duties set out in HSG264:
- To take reasonable steps to determine the location of materials likely to contain asbestos;
 - To presume materials to contain asbestos, unless there are good reasons not to do so;
 - To make and maintain a written record of the location of the ACMs and presumed ACMs;
 - To assess and monitor the condition of ACMs and presumed ACMs;
 - To assess the risk of exposure from ACMs and presumed ACMs and prepare a written plan of actions and measures
 - To take steps to see that these actions are carried out.
- 6.2 The Association also recognises the wider duties set out in CAR12, particularly in Regulations 5 and 6, in respect of maintenance, repair, refurbishment and demolition work in premises and the need to carry out appropriate, suitable and sufficient inspection/surveying, risk assessments and planning prior to any works on the fabric of premises.
- 6.3 To ensure compliance with these broad duties, specific roles and responsibilities have been defined, including procedures for addressing joint duties with third parties (e.g. in 'mixed tenure' premises) and all Association personnel will hold the requisite levels of competence to properly discharge their responsibilities.

- 6.4 This document also defines the Association's policy to ensure the risks associated with asbestos containing materials are properly addressed, assessed and managed and, in doing so, ensuring that the legal 'duty to manage asbestos' is discharged.

7. ROLES AND RESPONSIBILITIES

7.1 Asbestos Association Chart

The following chart summarises the Association's structure which facilitates a cascading of responsibilities down through the management chain to ensure those with the most appropriate daily operational functions can manage, supervise and physically carry out asbestos related control measures as appropriate.



7.1.1 The subsequent sub-sections provide further detail on these roles and responsibilities.

7.2 Committee and Sub-Committees

7.2.1 The Management Committee is collectively responsible for providing leadership and direction on Health & Safety for Cernach Housing Association.

7.2.2 The Operations Sub Committee, as delegated by the Management Committee, monitor tenant health & safety issues, which includes the management of asbestos. The Operations Sub Committee will consider the findings of all internal and external audits and investigations into reported asbestos failures and any steps required to rectify any significant non-compliances. Any concerns relating to asbestos risk management must be highlighted to the Director or Responsible Person. Any areas of concerns in this area will in turn be reported to the Management Committee for their consideration.

7.2.3 The Operations Sub Committee will be responsible for:

- receiving reports on asbestos matters
- periodically reviewing the effectiveness of the Management of Asbestos policy and approving the policy
- considering reports made by the Responsible Person and Asbestos Co-ordinator on the effectiveness of this policy and
- Acting immediately if any serious deficiencies are identified and escalating any concerns to the Director and/or Responsible Person without undue delay.

7.2.4 The Assurance Sub Committee has responsibility for issues relating to staff welfare and this includes ensuring staff are working in a safe environment. Also, it monitors that Cernach HA is undertaking its legal and moral responsibilities in respect of the staff it employs.

7.3 Director

7.3.1 The Director in holding the most senior level of executive control within the Association, will hold ultimate accountability and responsibility for the development and implementation of this Management of Asbestos Policy.

7.3.2 The Director will appoint a suitable and competent Asbestos Responsible Person to manage the Asbestos Management System.

7.3.3 The Director will make available all reasonable resources to the Responsible Person for the undertaking of his/her duties under this policy. The Director will also make available all reasonable resources to allow all others in the management chain to comply with their own defined responsibilities.

7.3.4 The Director will ensure adequate lines of communication with the Responsible Person and will take all reasonable steps to comply with all reasonable requests and issues raised by the Responsible Person.

7.4 Asbestos Responsible Person

- 7.4.1 The Responsible Person will be responsible for the practical delivery and implementation of this Management of Asbestos Policy and for identifying amendments/updates for improvement. All such suggested amendments will be escalated to the Director without undue delay.
- 7.4.2 The Responsible Person will appoint a suitable and competent Asbestos Co-Ordinator to deliver the responsibilities set out in 5.4 7.5 below.
- 7.4.3 The Responsible Person will provide all reasonable support (both Management and Technical) to the Asbestos Co-Ordinator to ensure his/her duties may be performed accurately and timeously.
- 7.4.4 The Responsible Person will ensure adequate lines of communication with the Asbestos Co-Ordinator and will take all reasonable steps to comply with all reasonable requests and issues raised by the Asbestos Co-Ordinator.
- 7.4.5 The Responsible Person will escalate all relevant issues, non-conformances, policy breaches and other material events to the Director without undue delay.
- 7.4.6 The Responsible Person will take all reasonable steps to deal with Asbestos related emergencies, uncontrolled risks and required actions brought to his/her attention.

7.5 Asbestos Co-Ordinator

- 7.5.1 The Asbestos Co-Ordinator will be responsible for:
 - 1. Maintaining an effective asbestos management strategy, as detailed in this Document.
 - 2. Assisting the Responsible Person to review and update as necessary this Policy document and report on its effectiveness to the Committees as chaired by the Director.
 - 3. Developing and maintaining an asbestos register of properties built before 2000, which will include updating the register whenever ACM's are removed/remediated.
 - 4. Providing contractors with all appropriate information and expectations of them as defined in Sections 7.8 to 7.11 of this management system and maintaining a record of all information sharing and governance issues.
 - 5. Providing information to interested parties on asbestos containing materials, as appropriate.
 - 6. Reporting any incident of alleged asbestos exposure and carrying out any required investigation, with the support of the Responsible Person. Also, where appropriate, ensuring the correct reporting of incidents under RIDDOR (Reporting of Injuries, Diseases and Dangerous Occurrences Regulations).

7. Providing the Enforcement Authorities with details of asbestos management procedures if/when requested.
8. Promoting awareness of the hazards of asbestos containing materials and the Association's Asbestos Management Procedures by advising on appropriate training and induction, in liaison with Administrative, Technical and Management staff.
9. Monitoring to ensure that all Staff are aware of their responsibilities under this policy.
10. Programming asbestos surveys (Management, Refurbishment and Demolition as appropriate) in the Association's properties to identify any asbestos containing materials that may be present and preparing/maintaining an Asbestos Register for each building.
11. Ensuring that adequate reviews of surveyed premises (and reinspection surveys) are carried out and that asbestos registers are updated accordingly.
12. Organising regular audits of the Asbestos Register.
13. Maintaining a current list of approved asbestos contractors (HSE Asbestos Licensed Contractors and Minor Works Contractors) and UKAS accredited asbestos testing/survey Associations.
14. Ensuring that the Asbestos Register is updated on completion of any works on asbestos containing materials.

7.6 Duty Holders

(i.e. any member of staff, other than those defined elsewhere, who has a specific role or responsibility for reactive maintenance and repairs as well as planned maintenance work contracts)

- 7.6.1 These staff members' job roles include an asbestos risk management element and, by definition, the staff members involved are classed as 'duty holders'
- 7.6.2 If any work is to be carried out in properties built before 2000 **which will interfere with the fabric of the building** then the following responsibilities for duty holders will apply.
- 7.6.3 The responsibilities include: -
 - a) Ensuring that before any **feasibility work** is started on any project that the Asbestos Register is consulted and information obtained on any asbestos containing materials within the premises. If there is no asbestos register for the premises, or if the Register does not confirm that an Asbestos Refurbishment or Demolition Survey has been carried out in the area to be disturbed, then the Duty Holder should request the Asbestos Co-ordinator to organise an appropriate asbestos survey. In this case a minimum of **6 weeks** must be allowed to enable surveys, sampling, analysis and reporting to take place.
 - b) Ensuring that, following Step 1, all personnel involved in the works are made aware of the asbestos findings. If no asbestos is identified then the works can proceed with caution, bearing in mind the possible presence of asbestos containing materials not identified in the Asbestos Register/Survey Report or in non-accessible or restricted areas.

- c) Ensuring all contractors organise training for their operatives in this Policy and any Procedure and can demonstrate adequate and appropriate competence and training. Training must be given by a UKATA approved training Association (or equivalent).
- d) Halting any works and informing staff, Contractors and Sub Contractors if suspected materials are discovered during the course of the works and immediately seeking advice from the Asbestos Co-Ordinator. This may include arranging for samples to be taken of any suspected materials, in accordance with the prescribed procedures, and arranging for the analysis of the samples by a test house with the appropriate UKAS (United Kingdom Accreditation Service) accreditation and from the Approved Contractor List.
- e) Asbestos Works - Ensuring that only contractors and consultants from the Association's Approved List, as maintained by the Asbestos Co-Ordinator, are used for all asbestos works.
- f) Asbestos Works - Ensuring that separate contracts are issued for asbestos remediation works and subsequent independent asbestos testing/monitoring (including 4-stage clearance tests) or utilising the services of a competent Asbestos Remediation Project Management Company.
- g) Asbestos Works - Ensuring copies of all test certificates, Certificates of Re-occupation and evidence of correct waste disposal are received from contractors and test houses (or the Asbestos Remediation Project Manager) within 10 working days of the completion of any work involving asbestos containing materials.
- h) Ensuring all contractors comply with their defined responsibilities under Sections 6.8 - 6.11.

7.7 Employees

7.7.1 All persons employed by the Association will be responsible for:

- a) Ensuring that any work that may disturb or damage known asbestos containing materials is avoided.
- b) Preventing any work on or intentional damage to building fabrics unless advice on the asbestos risk has been obtained from the Asbestos Co-Ordinator.
- c) Reporting to the Asbestos Co-Ordinator any materials suspected of containing asbestos, where the material has become disturbed and/or damaged.

7.8 General Contractors and Sub-Contractors (non-asbestos)

7.8.1 All contractors will be required to:

- a) Ensure and demonstrate that they are fully familiar with current legislation relating to the management of Asbestos Containing Materials.
- b) Ensure that they have a clear understanding of the Association's Management of Asbestos Policy

- c) Ensure that all staff to be utilised on the contract have received an appropriate level of asbestos awareness training. The training must be provided by an UKATA approved Association (or equivalent).
- d) Consult with any relevant asbestos registers / survey reports that may be available for establishments **before** work progresses (ensuring the appropriate type of survey has been carried out).
- e) Ensure that where work may be affected by, or involve, asbestos containing materials that an approved licensed/competent (depending upon the category of asbestos work) sub-contractor is engaged (unless the contractor itself is licensed/competent and approved by the Association) to carry out the work. This will also require liaison with the Duty Holder who will be responsible for commissioning the independent asbestos testing company or Asbestos Project Manager.
- f) Ensure that any relevant risk assessments, method statements, statutory notices are in place and adequately reference asbestos risk before work commences.
- g) Progress all works diligently and, if any suspect materials are encountered, to immediately suspend operations and to contact the Duty Holder or Asbestos Co-Ordinator for further instruction.
- h) Asbestos Elements - Provide copies of all test certificates, Certificates of Reoccupation, evidence of correct waste disposal to the Duty Holder within 10 working days of the completion of the work.
- i) **Contractors must ensure that Asbestos sub-contractors are approved by the Association before any order is placed or contract awarded and that all Plans of Work are approved by the Association.**

7.9 Asbestos Removal Contractors & Sub-Contractors

7.9.1 Asbestos Removal / Remediation contractors will be responsible for:

- a) Ensuring that they have a current license from the HSE to work with the relevant type of asbestos or can demonstrate competence where non-licensed work is concerned.
- b) Ensuring that they have current and adequate insurance cover for the asbestos works to be undertaken.
- c) Ensuring working practises are in compliance with current legislation and all associated HSE Approved Codes of Practice and HSE Guidance Notes.
- d) Attending site to assess and prepare quotations against asbestos work specifications. The contractor must raise any issues relating to health and safety, or potential additional costs, on the project with the Duty Holder.
- e) Attending site meetings as may be required, providing a written Method Statement and Risk Assessment (Plan of Work (POW)) to the Duty Holder ahead of the works starting. The POW must indicate the resources and timetable allocated to the project in accordance with *the Control of Asbestos Regulations 2012*. Emergency procedures must be discussed before work commences. In addition, and where licensed contractors are required to carry out asbestos works, the following documentation will be requested from the contractor prior to commissioning, and copies kept in the job file:

- current asbestos licence checked against HSE website
 - insurance certificate indicating the insured is covered for asbestos work (licensed work or minor work)
 - medical examination certificates (conducted by an Employment Medical Advisory Service registered doctor) for all personnel who will work on licensed or NNLW jobs
 - evidence of training records for all personnel who will work on the job (Category B or C depending upon works classification), provided by a United Kingdom Asbestos Training Association (UKATA) member or equivalent
 - where applicable, evidence of notification of the job to the HSE at least 14 days prior to commencement (see point 6 below)
 - Plans of Work prior to work commencing
 - Waste Consignment Notes to be received after works have been carried out
- f) Providing statutory notice to the Enforcing Authority as may be required prior to the commencement of any asbestos related works (e.g. 14 day Notification for licensed work) or, by agreement with the Duty Holder or Asbestos Co-ordinator, applying for a waiver against the minimum notice period. Copies of all such notices must be submitted to the Duty Holder or Asbestos Co-ordinator before work commences.
- g) Carrying out their obligations under the contract, including maintaining high standards of safety and hygiene in asbestos works and all related work areas and supplying labour, materials and equipment of the highest standard, complete with all supporting documentation as may be required.
- h) Arranging transport and disposal of asbestos waste materials in accordance with legislative requirements and providing copies of all Consignment Notes and supporting documents (e.g. registration of the Haulier with SEPA, details of licensed waste tip or waste transfer Station) to the Duty Holder without undue delay.
- i) Carrying out regular inspections of the work environment. Any defects found, or any reported by the Association's representatives, must be immediately rectified.
- j) Identifying to the Duty Holder any additional elements of work which are to be agreed. The POW must be updated accordingly.
- k) Liaising with the Association-appointed UKAS accredited asbestos testing Association to ensure the satisfactory progress of the works.
- l) Co-operating fully with any Asbestos Remediation Project Managers utilised by the Association.
- m) Providing copies of all test certificates, Certificates of Reoccupation and evidence of correct waste disposal to the Duty Holder (or Project Manager) within 10 working days of the end of site works.

7.10 Asbestos Analysts & Surveyors

7.10.1 Asbestos analysts, surveyors and consultants will be responsible for:

- a) Maintaining and demonstrating UKAS accreditation relevant to the requested task.

- b) Maintaining adequate insurance cover for the tasks to be undertaken.
- c) Providing support to the Duty Holder and/or the Asbestos Co-Ordinator as may be required.
- d) Reviewing and commenting on, when requested by the Duty Holder or the Asbestos Co-Ordinator, asbestos works such as: specifications, Contractor's and/or Sub Contractor's Method Statement, work procedures, etc.
- e) Carrying out analytical works and inspections as agreed with the Duty Holder or the Asbestos Co-Ordinator. Where site conditions alter, the analyst will be required to amend the level of testing and inspections to ensure that all information relevant to the continued health and safety of the Contractor and building occupants is obtained.
- f) Reporting to the Duty Holder or the Asbestos Co-Ordinator any defect or non-compliance relating to the Contractor's and/or Sub Contractor's performance, including suitability of the work area, adherence to the Method Statement, Statutory Instruments, and the Association's Management of Asbestos Policy. Where senior Association staff are not immediately available, the surveyor/analyst will be expected to take such measures as may be deemed necessary to ensure the health and safety of Contractors and Sub Contractors and building occupants. These actions must be reported to the Duty Holder or the Asbestos Co-Ordinator as soon as reasonably practicable.
- g) Checking areas on completion of asbestos remedial works to ensure that the contractor has completed the scope of works and all affected areas have been left in a satisfactory condition.
- h) Carrying out air monitoring tests as may be required by the Duty Holder or the Asbestos Co-Ordinator, or as identified in the POW.
- i) Reporting to the Duty Holder or the Asbestos Co-Ordinator any aspects of asbestos management encountered on site which could give rise to health risks e.g. breaches of the Management of Asbestos Policy, suspect or damaged asbestos.
- j) Issuing formal reports, including Certificates of Re-occupation, to the Duty Holder or the Asbestos Co-Ordinator on completion of any site works.

7.11 Asbestos Remediation Project Managers

7.11.1 Asbestos Project Managers will be responsible for:

- a) Assessing the **real** risks associated with proposed asbestos works, scoping the works and preparing legally compliant and cost effective removal/remediation works specifications.
- b) Tendering, or assisting the Duty Holder with tendering, ensuring the works are appropriate and contractors are competent.
- c) Reviewing Plans of Work and liaising with the contractor to ensure legal compliance and compliance with the requirements of the Association.
- d) On-site project management, auditing, supervision, monitoring and testing to ensure safety and quality control and compliance with all legal requirements.

- e) Completion of a final site review to verify the suitability for the site for handover and the completion of works as agreed.
- f) Preparation of a project completion / compliance report for the Association's long-term protection against liability.

8. COMPETENCE – INFORMATION, INSTRUCTION AND TRAINING

- 8.1 The following table defines the training matrix applicable to all personnel involved in the Asbestos Management System. The Responsible Person will be responsible for ensuring all relevant personnel are provided with the appropriate training and records will be maintained of all training provided.

Training	Director	Responsible Person	Asbestos Co-Ordinator	Duty Holders	All Employees
Asbestos Awareness (Category A)	✓	✓	✓	✓	✓
Training on the Management of Asbestos Policy and Procedures	✓	✓	✓	✓	
Training on Specific Roles & Responsibilities	✓	✓	✓	✓	✓
Asbestos for Managers and Duty Holders	✓	✓	✓		
Accredited Asbestos Management Course		Optional	Optional		

9. DOCUMENT CONTROL

- 9.1 The Asbestos Management System relies upon the maintenance of a range of documentation, for which the Responsible Person is responsible. The following summarises the principal components of the system:

1. Asbestos Register and Survey Reports Folder
2. Policy Document
3. Procedure Document
4. Asset Register – incorporating property list / relevant premises (i.e. post 2000)
5. Approved Asbestos Contractors and Consultants List
6. Training Records
7. Incident Records
8. Asbestos Works Records

10 STAFF TRAINING

- 10.1 Cernach recognises that it is extremely important to manage asbestos and that the resourcing and training of staff is adequate in this area. The Association will ensure staff receive training relating to the management of asbestos. Training will be updated as appropriate and training records maintained. Staff will be encouraged to network with the sector to share best practice in this area.

11 COMPLAINTS

- 11.1 The Association has a published Complaints policy & procedure, which can be used where there is dissatisfaction with this policy or the operation of this policy. Any tenant who feels aggrieved by their treatment under this policy can ask for a copy of the Association's complaints policy, which is available at the Association's office and on the website www.cernachha.co.uk.
- 11.2 As with all our service policies, the complaints policy can be made available in large print, translated or on tape. Tenants also have the right to complain to the Scottish Public Services Ombudsman if they are not satisfied with our stage 2 response.

12 AUDIT & REVIEW

- 11.1 The Responsible Person will arrange for the Asbestos Management System to be audited and reviewed at least once every 12 months.
- 11.2 The audit / review may be carried out internally or by an external consultant. However, the auditor must be deemed to be competent by the Responsible Person.
- 11.3 The audit / review will take account of all policies, procedures, asbestos register, training records and all records associated with asbestos works.
- 11.4 A written report will be prepared detailing the findings of the audit / review, highlighting any non-conformances and/or areas for improvement and making recommendations and suggestions. The report will be made available to the Operations Sub-Committee and Director by the Responsible Person.

13. ASBESTOS TECHNICAL PROCEDURES

- 13.1 This policy sets out the overarching framework for asbestos management. There is a separate Management of Asbestos procedure document which form part of the Asbestos Management system.
- 13.2 These procedures are documents which are used by the Maintenance staff as part of their day-to-day duties. The procedures are prepared to ensure compliance with Cernach HA's Management of Asbestos policy and the defined Roles and Responsibilities of key staff in this area of work.

14 CONTINUAL IMPROVEMENT & CONSULTATION

- 14.1 The Association is committed to achieving continual improvement in the management of risk associated with Asbestos. The Operations Sub-Committee will review the Management of Asbestos policy every three years. This review will be brought forward if there is need to respond to new legislation and/or policy guidance. We will introduce additional controls where knowledge or technology on the subject develops and as the risk assessment, monitoring and control schemes dictate. There will be a separate procedure for this area.
- 14.2 The Responsible Person will be responsible for overseeing the entire Asbestos Management System and will champion the continual improvement programme.
- 14.3 The Association has developed this policy in consultation with tenants and the resident participation group and take account of representations made.
- 14.4 The Association will publish a summary of this policy in our newsletters and make it available of the Association website.

Cernach Housing Association Equality Impact Assessment Tool



Name of the policy / proposal to be assessed	Management of Asbestos Policy	Is this a new policy / proposal or a revision?	Revision
Person(s) responsible for the assessment	Kimberley Cowan		
1. Briefly describe the aims, objectives and purpose of the policy / proposal	The purpose of this policy is to set out how the Association will manage Asbestos containing materials (ACM's) within our housing stock. This policy aims to mitigate so far as reasonably practicable the risks associated with disturbing asbestos or fibres being released as a result of deterioration. This objective it to highlight how the asbestos is going to be managed by all persons who have responsibilities in this area.		
2. Who is intended to benefit from the policy / proposal? <i>(e.g. applicants, tenants, staff, contractors)</i>	All tenants, residents, owners, staff, contractors and the general public who may be in the vicinity of the contained ACM's. Also, our contractors who may be carrying out work near the ACM and may disturb or damage the ACM.		
3. What outcomes are wanted from this policy / proposal ? <i>(e.g. the benefits to customers)</i>	To ensure that asbestos is managed and that we inspect regularly so we can manage and thus mitigate the risks to tenants, owners, staff, contractors and the general public.		

4. Which **protected characteristics** could be **affected** by the proposal? (*tick all that apply*)

- ☐ Age ☐ Disability ☐ Marriage & Civil Partnership ☐ Pregnancy/Maternity ☐ Race
- ☐ Religion or Belief ☐ Gender ☐ Gender Reassignment ☐ Sexual Orientation

5. If the policy / proposal is not relevant to any of the **protected characteristics** listed in part 4, state why and end the process here.

6. Describe the likely positive or negative impact(s) the policy / proposal could have on the groups identified in part 4	Positive impact(s)	Negative impact(s)
		No negative impacts have been identified.
7. What actions are required to address the impacts arising from this assessment? (<i>This might include; collecting additional data, putting monitoring in place, specific actions to mitigate negative impacts</i>).	N/A	

Signed: K Cowan
Job title: Operations Manager

Date the Equality Impact Assessment was completed: 06/05/2026

Please attach the completed document as an appendix to your policy / proposal report