

31. Society Asbestos Management					
Version number	2022v1	Date Created	06/2022	Replaces	2021v3

1. Introduction

This policy sets out the aims and objectives of The Midcounties Co-operative Society (hereby referred to as “the Society”) to ensure that the risk from known or suspected Asbestos Containing Materials (“ACM”) within the Society owned or controlled buildings is adequately managed, so that as far as reasonably practicable, no one can come to any harm from asbestos.

The Society as employers have a general duty under The Health and Safety at Work Act 1974 to ensure so far as is reasonably practicable, the health, safety and welfare of all their Colleagues and Contractors.

Colleagues and Contractors have a duty to take reasonable care for their own health and safety and that of others who may be affected by their acts or omissions at work.

It is the responsibility of any person employed by the Society to comply with this Policy.

1.1 Scope

The Society recognises its duties under the Health and Safety at Work Act, 1974 and the Control of Asbestos Regulations 2012 and all associated Approved Codes of Practice and is committed to the effective management of asbestos.

The Society recognises its responsibilities to contractors and others involved in building and maintenance projects established through the Construction (Design and Management) Regulations 2015 and its duties as the ‘Duty Holder’ of Society owned buildings as defined by Regulation 4 of the Control of Asbestos Regulations 2012.

Where the term ‘Colleagues’ and ‘regular building users’ has been used it should be taken to refer to all direct employees, agency staff, and long term contracted suppliers.

Where the term ‘contractors’ has been used in this policy document it should be taken to refer to all parties who undertake work for the Society on a short term, limited contract basis. This would include tradesmen brought in for a specific task or time period, but not those who have an on-going supply agreement with the Society.

1.2 Definitions

The Control of Asbestos Regulations 2012 came into force on 6 April 2012, updating previous asbestos regulations to take account of the European Commission's view that the UK had not fully implemented the EU Directive on exposure to asbestos (Directive 2009/148/EC).

Asbestos fibres are present in the environment in Great Britain, so people are exposed to very low levels of fibres. However, a key factor in the risk of developing an asbestos-related disease is the total number of fibres breathed in. Working on or near damaged asbestos-containing materials or breathing in high levels of asbestos fibres, which may be many hundreds of times that of environmental levels, can increase your chances of getting an asbestos-related disease.

The control limit for asbestos is 0.1 asbestos fibres per cubic centimetre of air (0.1f/cm³). However, this is not a 'safe' level and exposure from work activity involving asbestos must be reduced to as far below the control limit as possible.

2. Policy Approach

The foundation to the Society's approach to controlling asbestos is:

- Identify and assess sources of risk;
- Implement, manage and monitor measures to control the risk;
- Appoint appropriate persons to be managerially responsible for the Policy implementation; and
- Keep records of the precautions implemented.

3. Assessing Sources of Risk

3.1 Risk Assessment

The Society will ensure risk assessments are undertaken to determine the presence, type, condition and location of ACM, and a risk-based approach to ACM management is implemented and recorded.

Site Managers and regular building users will have access to the site's asbestos report by accessing our approved contractor's asbestos portal.

All colleagues working in a site with known ACM have a role in protecting the health and safety for all and managing ACM is part of this. As such, basic information will be provided to these Colleagues, and specific training and instruction will be given to all those directly involved with Asbestos Management to ensure competency levels are always suitably maintained.

3.2 Risk Assessment Schedule

New Risk Assessments will be undertaken as part of developmental/ refurbishment or demolition activities.

3.3 ACM Management Surveys

Where a site's ACM is considered safe to remain in situ, a periodic program of management surveys will be completed to ensure any deterioration and associated remedial works are identified. Where it is considered applicable, such surveys may be completed to a greater frequency.

Locations of suspected ACM will be included in this program.

3.4 "Assumed only" ACM Management Surveys

In a small number of cases, where there is only a small number of assumed ACM locations identified on a site (for example, assumed fire proofing inside safes; or assumed fire proofing within fireman's switches, etc), the ACM Management Survey program will be a combination of Society site management visual reviews and Contractor management surveys.

4. Responsibilities

General

The Society's Management has the overall responsibility for the implementation of this Policy to ensure safety within all the Society's sites. In addition, management has a statutory duty to ensure that compliance with this Policy is continual and not notional.

The Society has identified the following responsible positions to implement and maintain its Asbestos Management policy.

4.1 Key Roles for Policy Implementation

Statutory Duty Holder - Secretary & Head of Governance

The Statutory Duty Holder ("SDH") has the overall responsibility for ensuring compliance with all statutory regulations and therefore this Policy. To fulfil their responsibility, the Statutory Duty Holder will identify someone with sufficient authority, competence and knowledge of the installation to take responsibility for providing advice and guidance to the Society, known as the "Asbestos Advisory Lead", and provide all resources deemed necessary to manage the risk posed by asbestos.

For full details of this role refer to Appendix 4.

Asbestos Advisory Lead – Health & Safety Manager

The Asbestos Advisory Lead ("AAL") has overall responsibility to provide advice and guidance on effective management of Asbestos in the Society, taking reasonable steps to monitor the implementation of the policy so ensuring that all Colleagues and Contractors are made aware of asbestos in their workplace and how best to manage this hazard.

For full details of this role refer to Appendix 5.

Asbestos Operations Lead - Chief Operating Officer ("COO") for each Trading Group

The Asbestos Operations Lead ("AOL") has overall responsibility for the successful implementation of all site-based control measures identified in this policy to ensure colleague and contractor safety on site.

For full details of this role refer to Appendix 6.

Asbestos Compliance Co-ordinator - Property Compliance Advisor ~Trading

The Asbestos Compliance Co-ordinator ("ACC") will maintain an Asbestos survey and inspection program to ensure the Society is fully aware of the presence and condition of Asbestos containing materials (ACM) within its Estate.

The Asbestos Compliance Co-ordinator will act as "Primary Contract Owner" for communication with assigned contractors relating to compliance issues.

For full details of this role refer to Appendix 7.

Asbestos Property Co-ordinator - Property Maintenance and Contracts Manager

The Asbestos Property Coordinator (“APC”) will ensure that any property related refurbishment or remedial works involving the repair or removal of asbestos containing materials (ACM) are managed correctly and in line with this Policy.

The Asbestos Property Co-ordinator will act as “Primary Contract Owner” for communication with assigned contractors relating to property issues.

For full details of this role refer to Appendix 8.

Communication and Contact Details

Internal Contacts - Initial contact via COOP House 01926 516000.

For Communication Flow refer to Appendix 1 “Communication Flowchart”.

4.2 Additional Roles and Responsibilities

The following departments have been identified in having additional responsibilities in supporting the policy implementation.

Property Services Department

The Society’s Property Services Team is responsible for the handling and suitable instruction of any required works requests in relation to ACM on site. They are responsible to develop, implement and monitor safe systems of work to protect the safety, health and welfare of employees, building users and third-party contractors for the duration of the contractor’s time on site.

These instructions will ensure that all contractors are competent; that they are aware (before starting work) of the nature, extent and locations of any known or suspected ACM which may affect their work; where such information is kept; and what they should do if asbestos has been disturbed.

Calls relating to ACM exposure will be handled as a Priority 1 call, and appropriate SLA observed.

Project Managers will liaise with the Asbestos Property Co-ordinator on any projects being undertaken.

Health & Safety Department

The Society’s Health & Safety Team will monitor effective completion of site-based activities, during internal Health & Safety Audits, and implement measures to correct non-conformity.

The Health and Safety Team will also complete any RIDDOR reporting in the event of a confirmed case.



Society Health & Safety Policies and Procedures

Site Management Team

The Society's Site Management teams are responsible for completing tasks as allocated by this policy at site level and the reporting any ACM damage as a priority.

The site teams should ensure any contractor attending site to work in known areas of ACM are aware of ACM locations before commencing works.

Asbestos Management Contractor

The selected Asbestos Management Contractor is responsible for delivering tasks as allocated in the Society's policy. Duties will include:

- Monitoring and sampling, reporting & logging;
- Maintaining accurate Asbestos Registers;
- Ad-hoc training – on site; and
- Risk Assessment and Annual condition survey completion.

The Asbestos Management Contractor will notify the "Primary Contract owner" of any situation that they deem to be of a high risk. See Appendix 2 and 3

External Contacts

Asbestos Contractor – PCS Services – 01484 604920.

Consultants

The responsibilities for Asbestos Management advice and guidance lies with PCS Services.

5. Training and Competence

General

Any worker liable to disturb asbestos while performing their normal everyday work is required to be trained. The Society will ensure that adequate information, instruction and training is given to those Colleagues who are liable to be exposed to asbestos during the course of their work.

Types of Asbestos Training

There are three types of asbestos training:

- Awareness training – Colleagues only;
- Training for non-HSE asbestos licence work - Society Maintenance Team only; and
- Training for HSE asbestos licence work – Contractors only.

5.1 Awareness Training - Colleagues

Where a site is known to have ACM, Managers will undertake initial awareness training and then annual refresher training to ensure they maintain awareness in the management and control of asbestos.

A training needs assessment will be completed to ensure that any potential changes in key personnel/job roles are reviewed to ensure compliance to recognised roles and responsibilities.

Records of all training will be kept in line with the Society's internal policy.

5.2 Training for non-HSE asbestos licence work - Society Maintenance Team

The Asbestos Property Co-ordinator will ensure that all relevant Colleagues will undertake initial awareness training and then annual refreshers training to ensure they are kept updated on new developments in the management and control of asbestos to ensure competent performance of their specific duties.

Training will be reviewed periodically and refreshed at least every 3 years or when there is reason to believe that training is no longer suitable, such as poor performance against compliance criteria, or updates to guidance and legislation.

5.3 Training for HSE asbestos licence work – Contractors

The Asbestos Property Co-ordinator will ensure that approved contractors complete appropriate training and refresh this training at least every 3 years to ensure they are kept updated on new developments in the management and control of asbestos to ensure competent performance of their specific duties.

5.4 Contractor Competency

The Asbestos Property Co-ordinator will ensure that only Society approved, licensed asbestos removal contractors will carry out any planned, necessary licenced works on asbestos containing materials. A list of used and approved contractors is maintained for this purpose.

The Asbestos Compliance Co-ordinator will ensure that only Society approved competent contractors will carry out Asbestos Risk Assessments and Asbestos Management Surveys.

6. ACM Exposure

6.1 Notification of exposure

In such an event, the Society will fully comply with the local Authority in their investigations.

In the event of a confirmed case of ACM exposure on a Society site, the Asbestos Advisory Lead will follow the Society's Major Incident Plan in relation to Asbestos.

Any confirmed cases (e.g. a doctor notifies the Society as the employer) will be reported under RIDDOR guidelines.

6.2 Health Screening

If relevant, the Society will provide appropriate precautionary health screening for Colleagues who may have come into contact with ACM during the course of their work.

6.3 Actions to take in the event of exposure or outbreak on site

The following procedure should be followed whenever suspected ACM are identified:

- Stop work immediately.
- Isolate the area, i.e. shut doors and windows etc.
- Post warning notices and inform people in the immediate area and request that everyone move away.
- Contact the Asbestos Co-ordinators for guidance and instruction.
- Appropriate risk assessments and control procedures shall be agreed following consultation with the Responsible Person and implemented to avoid exposure of ACM to building users.
- Encapsulation, treatment or removal of the disturbed ACM shall be carried out in accordance with current legislation before areas are re-occupied.

See Appendix 2 and 3 for communication flow.

7. New and Refurbishment Works

General

In circumstances where a 'site' is under control of a Principal Contractor and ACM are discovered the procedures contained in the Health and Safety Plan should be followed and the Project Manager and Primary Contract Owner informed as soon as practical.

See appendix 1 for communication flow.

7.1 Remedial Works

Where historic remedial works are required on a site, these will be reviewed, and a risk-based program implemented to address critical items.

8. Verification and Measures

To manage the effectiveness of this policy in controlling asbestos within the Society, the following Verification and Measures will be used.

Verification required	Verification	Timing	Who
All contractors check for ACM details prior to starting work	Confirmation	Quarterly	APC
All Contractors maintain relevant staff training	Confirmation	Annual	APC
All approved Contractor accreditation remains compliant	Check	Annual	APC/ ACC
Periodic Policy review completed, and updates shared with key personnel	Policy Review	Every 3 years	AAL & SDH

Measurement Criteria	Measure	Timing	Who
Sites with a current Asbestos Survey available on Portal,	% of sites	Annually	ACC
Sites with a current Management Survey, visits completed to schedule	% of sites	Quarterly	ACC
Colleague training is up to date, by completion	% of colleagues	Quarterly	APC/AOL

9. Dissemination and Implementation

This policy document will be published by the Society and kept available for reference. Any changes to this document must be implemented only with the authority of the Appointed Responsible Person.

9.1 Consultation, Approval, Ratification & Review

This document will be issued for formal consultation in draft form prior to issue. The following Colleagues will be consulted:

- Head of Audit and Risk and Compliance
- Head of Insurance and Compliance
- Statutory Duty Holder
- Asbestos Advisory Lead
- Asbestos Operations Leads
- Asbestos Compliance Co-ordinator
- Head of Property Services
- Asbestos Property Co-ordinator

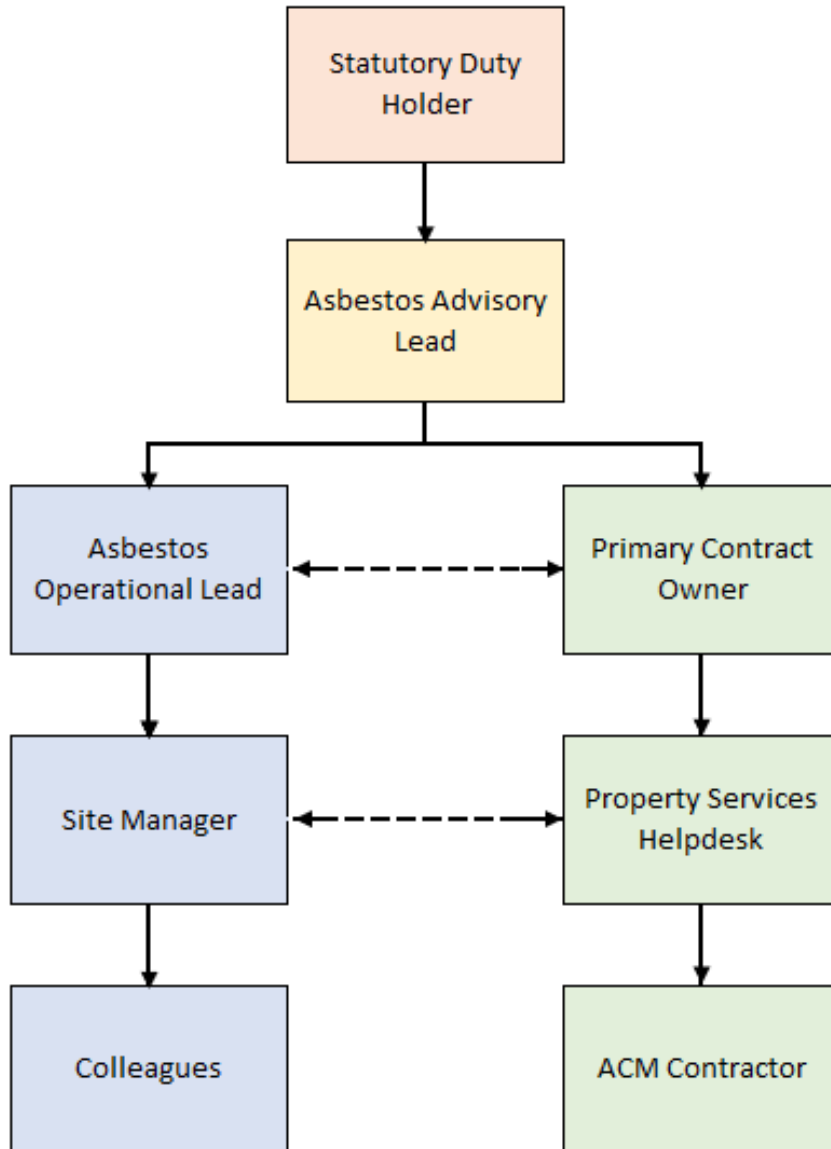
The Statutory Duty Holder is to review, approve and ratify this policy.

9.2 Policy Review Schedule

This Policy will be reviewed every three years, or whenever there is reason to believe that it is no longer relevant. The review will be completed by the Asbestos Advisory Lead.

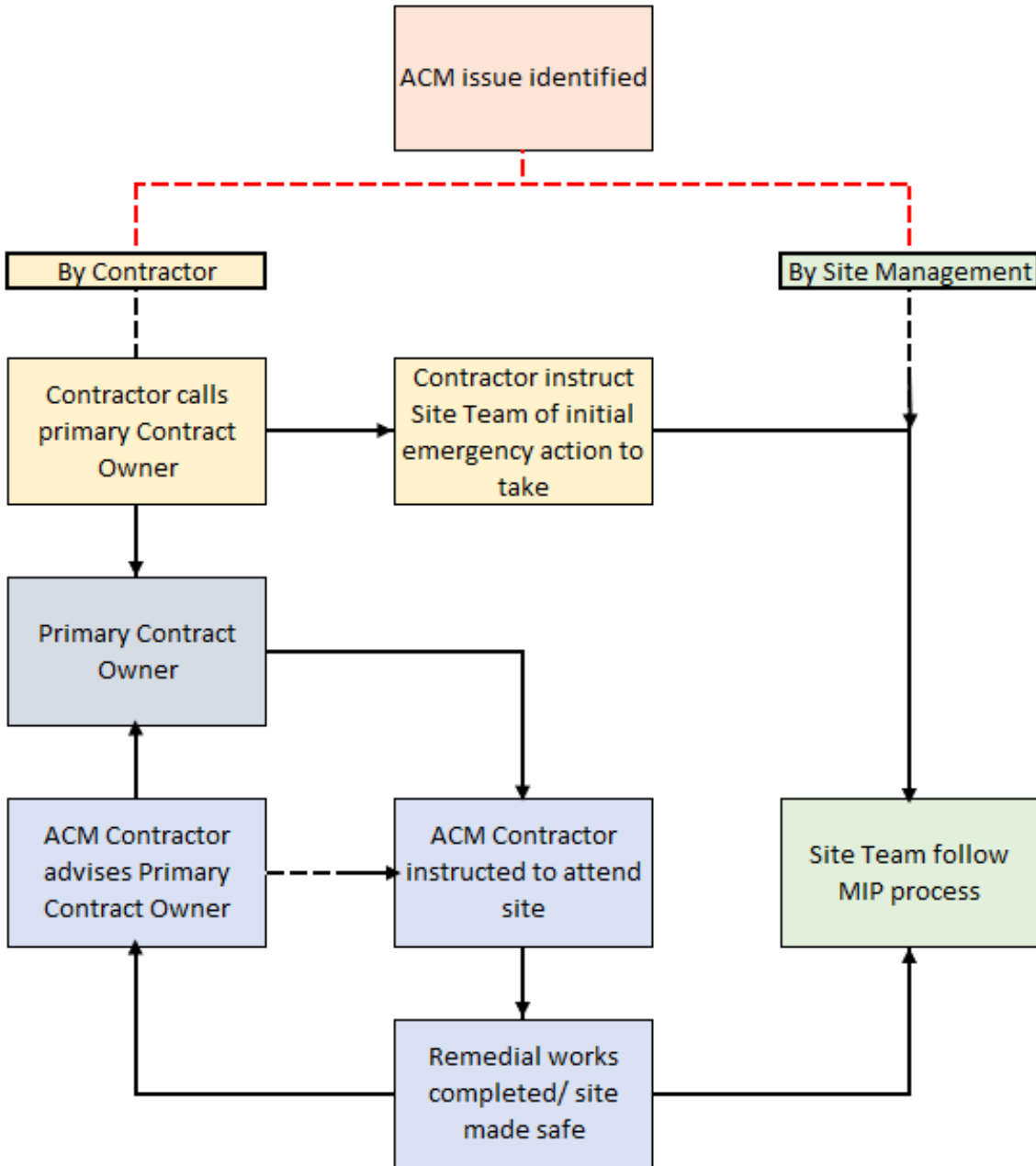
Appendix 1

Communication Flowchart



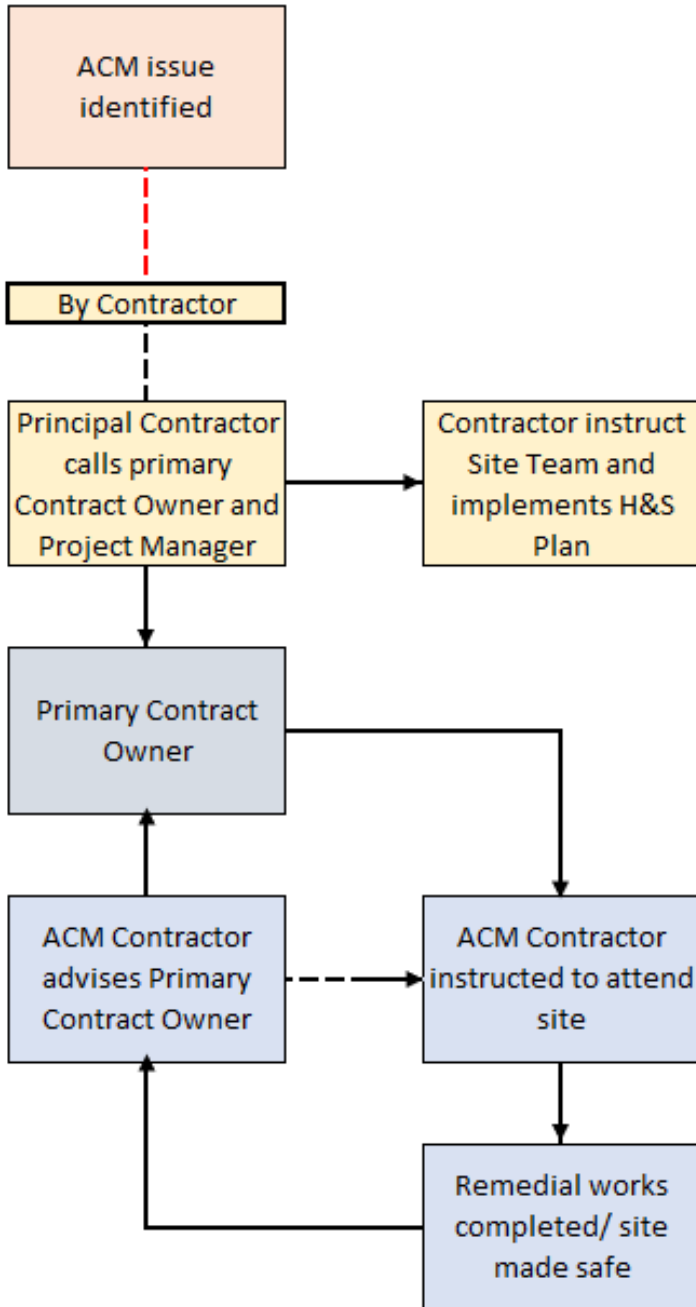
Appendix 2

ACM Outbreak flow chart - Operational Sites



Appendix 3

ACM Outbreak flow chart - New and Refurbishment Works



Appendix 4

Roles and Responsibilities

Statutory Duty Holder (SDH)

The Statutory Duty Holder has the overall responsibility for ensuring compliance with all statutory regulations and therefore this Policy. To fulfil their responsibility, the Statutory Duty Holder will:

- Identify an appointed responsible person with enough authority, competence and knowledge of the installation to take responsibility for advice and guidance on the management of asbestos - to be known as the “Asbestos Advisory Lead”
- Provide all resources deemed necessary to manage the risk posed by asbestos
- Maintain an awareness of compliance and intervene as necessary

In selecting the Asbestos Advisory Lead, the Statutory Duty Holder should;

- Have a clear understanding of the role and the overall health and safety management structure and policy in the organisation
- Review the management programme and change/improve any aspects that are highlighted by the review process
- Ensure the responsibilities of the Asbestos Advisory Lead moves down the management structure to a deputy responsible person during periods of absence
- Ensure that lines of communication are clear, unambiguous and audited regularly to ensure they are effective. This also applies to outside companies and consultants who may be responsible for certain parts of the control regime
- Ensure there are sufficient levels of training that ensure tasks are carried out in a safe, technically competent manner; with regular refresher training

Appendix 5

Roles and Responsibilities

Asbestos Advisory Lead (AAL)

The Asbestos Advisory Lead has overall responsibility to provide advice and guidance on effective management of Asbestos in the Society, taking reasonable steps to monitor the implementation of the policy so ensuring that all Colleagues and Contractors are made aware of asbestos in their workplace and how best to manage this hazard.

The Asbestos Advisory Lead will take reasonable steps to:

- Ensure all Colleagues and Contractors exposed to ACM maintain suitable levels of competence
- Ensure that the Asbestos Survey and Management Report is up-to-date, and available for inspection at all times. At any time, there is reason to believe the risk assessment is no longer valid, the risk assessment should be reviewed
- Ensure that all Colleagues, users, contractors or other visitors working in areas or undertaking activities where ACM hazards could exist are made aware of potential hazards and controls detailed in the relevant Risk Assessments and Management Plans
- Ensure all records are retained for at least 5 years
- Undertake the development of an Asbestos Management Plan which will be monitored, reviewed and revised regularly, and which will state what steps will be taken to manage the risk from known or suspected ACM
- Ensure that regular training of relevant managers and staff has been completed and ensure third party contractors are informed where necessary to ensure that information is effectively disseminated
- Gain advice as necessary, from suitably qualified consultants and control specialists
- Ensure Society's Major Incident Plan (MIP) process is followed in the event of an ACM release, and make necessary arrangements to support any investigation relating to such an outbreak
- Ensure suitable deputies are nominated to cover periods of absence and are kept up-to-date and aware of any issues
- Periodically review the Policy's "Verification and Measures" to ensure the Policy is correctly implemented across the Society and identify areas of further improvement

Appendix 6

Roles and Responsibilities

Asbestos Operational Lead (AOL)

The Asbestos Operations lead has overall responsibility for the successful implementation of all site-based control measures identified in this policy to ensure colleague and contractor safety on site.

The Operations Lead will ensure that:

- All site-based control measures are completed to a suitable standard and to the agreed schedule by site colleagues
- All site-based training requirements are completed by site teams where applicable including during periods of site management changes
- Colleagues maintain awareness of escalation measures in the event of ACM exposure – see appendix 3
- Adequate resources are provided for the successful site implementation of control measures within this Policy
- Arrange and maintain any Health Screening programs for site-based colleagues
- Where applicable, the Policy's "Verification and Measures" are reviewed periodically to ensure the Policy is correctly implemented within the Group

Appendix 7

Roles and Responsibilities

Asbestos Compliance Co-ordinator (ACC)

The Asbestos Compliance Co-ordinator will maintain an Asbestos survey and inspection program to ensure the Society is fully aware of the presence and condition of Asbestos containing materials (ACM) within its Estate.

The Asbestos Compliance Co-ordinator will:

- Act as “Primary Contract Owner” for communication purposes of assigned contractors - see below
- Maintain a program for all owned/controlled buildings to have an Asbestos Survey completed and the information made available to all parties affected by the presence of ACM
- Implement a program of systematic Management Surveys, to find and record the location and condition of known or suspected ACM
- Compile and maintain a record (Asbestos Register) of all known or suspected ACM within of all premises owned or controlled by the Society
- Maintain regular reviews of the Asbestos Management Plan so that it is kept up to date in accordance with Regulation 4 of the Control of Asbestos Regulations 2012
- Maintain records, and periodically audit compliance. Records of monitoring and inspection will be kept for 5 years
- Where applicable, periodically review the Policy’s “Verification and Measures” to ensure the Policy is correctly implemented across the Society

Primary Contract Owner

The “Primary Contract Owner” has overall responsibility for managing the contract held with relevant approved contractors and will:

- Instruct all assigned contractors working in Society premises, before starting work, so raising awareness of the type and location of known or suspected ACM which may affect their work; where such information is kept; and the action to take should they suspect asbestos has been disturbed

Appendix 8

Roles and Responsibilities

Asbestos Property Co-ordinator (APC)

The Asbestos Property Coordinator will ensure that any property related refurbishment or remedial works involving the repair or removal of asbestos containing materials (ACM) are managed correctly and in line with this Policy. The Asbestos Property Coordinator will:

- Act as “Primary Contract Owner” for communication purposes of assigned contractors
- Actively work with Sites to maintain services that could compromise the service provision, ensuring safe accesses to suspected areas when needed
- Involve the operational site manager responsible for the building
- Actively lead and advise on the removal of any contaminants that could compromise access to areas, plant and or equipment within any of the Society buildings
- Prior to any project works (refurbishment, demolition, etc) will ensure confirmation has been received in respect of a specific asbestos assessment and that steps to mitigate the risk posed by any potential asbestos present in areas affected by the planned works have been taken
- Oversee the removal of any high-risk asbestos items identified in Society premises and actively manage any remaining asbestos to ensure the continued, safe running of all Society premises.
- Implement and regularly review suitable control measures to ensure that the risk from ACM is adequately managed
- Will implement initial and on-going refresher training with all Property Maintenance personnel so that they are kept updated on new developments in the management and control of asbestos to ensure competent performance of their specific duties. Attendance will be recorded and maintained ready for inspection if required
- Will complete a review with all Contractors engaged in asbestos related activities to confirm adequate levels of training have been completed
- Be actively involved in monitoring any asbestos or consultancy works completed by a third party (such as an asbestos consultant, laboratory, principal contractor or a licensed contractor). Where records or documents are prepared or maintained by a third party, this will be clearly stated, and centrally controlled by the Society. Records will be kept for at least 5 years
- Instruct the labelling of ACM locations in non-public areas and/or areas where labelling is deemed necessary to ensure the safety of building users. (at the Society’s discretion)
- Only instruct Society approved, licensed asbestos removal contractors to carry out any planned, necessary works on asbestos containing materials. A list of used and approved contractors is maintained for this purpose
- Will ensure that all surveys, inspection & test results and certificates produced for sites, for the purpose of record keeping, are provided by the appointed contractor
- Arrange and maintain any Health Screening programs for in-house team colleagues
- Where applicable, review the Policy’s “Verification and Measures” to ensure the Policy is correctly implemented cross the Society

Primary Contract Owner

The “Primary Contract Owner” has overall responsibility for managing the contract held with relevant approved contractors and will:

- Instruct all assigned contractors working in Society premises, before starting work, so raising awareness of the type and location of known or suspected ACM which may affect their work; where such information is kept; and the action to take should they suspect asbestos has been disturbed

Appendix 9

Consultation, Approval, Ratification and Review Checklist

The Society and Date of Meeting

Purpose **Approval or review**

Checklist for Ratification			
1	Format		
	Has the standard template been used?	Yes / No	Comments:
2	Consultation		
	Please identify who has been consulted in the writing of this document:		
	Mick Tattersall	Caroline Nichols	
	Julie Sheldon	Chris Williams	
	Meg Stone		
	Francis Knowles		
	Have the correct duty holders been consulted?	Yes / No	Comments
	Is there need for further consultation?	Yes / No	Please state who:
3	Approval		
	Are all involved in consultation able to approve policy?	Yes / No	Comments: approved for release by Edward Parker
	Date of Approval	Date: 9/8/2021	
4	Further actions		
	Is anything required prior to submission for ratification?	Yes / No	Comments
	Please state the timescale for further actions:		

<i>For completion by the Statutory Duty Holder</i>	
Policy Ratified	Yes / No (please delete)
Signature	
(Position)	
(Print Name):	
Additional actions required	

for ratification:	
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Appendix 10

References

Health and Safety at Work Act 1974, Sections 2, 3 and 4.

Management of Health and Safety at Work Regulations 1999 (particularly 2, 3, 4 and 6).

Control of Substances Hazardous to Health Regulations 2002 (COSHH).

Reporting accidents and incidents at work: A brief guide to the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR).

HSE – Control of Asbestos Regulations 2012. ACOP Guidance (including ACOP L127 and L143). <https://www.hse.gov.uk/pubns/books/l143.htm>

Version Control

Asbestos Policy 2019v1 Draft 1	November 2019
Asbestos Policy 2021v2 Draft 2	July 2021
Asbestos Policy 2021 v3 Final	August 2021
Asbestos Policy 2022 v1 Final	June 2022