



**Our vision is
"to deliver excellent Housing Services"**

Asbestos Management

Newark and Sherwood Homes Limited



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1.0 Introduction

- 1.1 The control of Asbestos Regulations 2006 imposed new duties on Newark and Sherwood Homes (NSH) to record and manage asbestos within its properties.
- 1.2 This document sets out how the regulations affect NSH and details the current procedure in place which will ensure NSH meet the requirements of the current asbestos regulation.
- 1.3 The document also provides background on our present position in respect of complying with the legislation.

2.0 Background

- 2.1 The Control of Asbestos Regulations 2006 and its associated codes of practice came into force in November 2006. The Control of Asbestos at Work regulations imposes a duty on occupiers and users of non-domestic properties (which includes common parts of managed residential blocks) to record and manage asbestos. This Regulation came into effect from 21st May 2004.

3.0 The Duty to Manage

- 3.1 The occupier, manager or person/body responsible for a building, which may contain asbestos, has either a legal duty to manage the risk from asbestos containing materials; or a duty to co-operate with whoever manages that risk.
- 3.2 Buildings constructed prior to 1999 can contain limited asbestos products and buildings pre1985 may contain substantial quantities of asbestos.
- 3.3 The person responsible for a building (The Duty Holder) is required to manage the risk from asbestos by:
 - Identifying asbestos containing materials within the premises and assessing their condition.
 - Presuming materials contain asbestos unless there is strong evidence that they do not;
 - Maintaining an up to date record of the location and condition of the asbestos containing materials to be managed;
 - Assess the risk of the likelihood of anyone being exposed to fibres from these materials.
 - Prepare a plan setting out how the risks from the materials are to be managed, take the necessary steps to implement the plan and review and monitor the plan periodically.

- Providing information on the location and condition of asbestos containing materials to anyone liable to work on or disturb them.
- 3.4 The "Duty Holder" responsible for the management of asbestos in non-domestic premises as set out in Regulation 4(1) of CAR 2006 is every person who, by virtue of a contract or tenancy, has an obligation for the repair and maintenance of those premises or, in the absence of such, the control of those premises or access to and from the property. Parties who may be Duty Holders include landlords, tenants, or managing agents.
- 3.5 To ensure the health and safety of employees, tenants and contractors the Asset Management and Investment Team are developing the asbestos register and associated management plans to discharge the responsibilities in relation to asbestos.

4.0 Management of Asbestos

- 4.1 NSH in recognition of its duties under the Health and Safety at Work Act 1974 towards its employees, residents, visitors, service users, contractors and members of the public, undertakes to manage responsibly all asbestos containing materials (ACM's) within its control.
- 4.2 NSH aims to prevent the exposure to asbestos of anyone who may be affected by the maintenance or other activities. Where this is not reasonably practicable, NSH will reduce exposure to the lowest level reasonably practicable, by measures other than the use of personal protective equipment (PPE).
- 4.3 NSH will ensure that an assessment is undertaken to determine the presence of asbestos in all non-domestic premises for which they are responsible.
- 4.4 NSH will undertake a sample of type 2 asbestos surveys of domestic premises, which are part of a planned maintenance programme. Where extensive refurbishment is taking place at a property a type 3 asbestos survey will be undertaken prior to works commencing. A register of these assessments shall be maintained and reviewed and updated by the Asset Management and Investment Team. NSH shall review these assessments in line with Regulation 4 of the Control of Asbestos at Work Regulations 2006, on a 12 monthly basis to ensure their validity or as recommended within the survey assessment.
- 4.5 NSH will maintain and regularly update a register of all identified asbestos containing materials and this shall be able to be accessed by all parties who require information on the presence of asbestos in its properties.
- 4.6 Service Managers must ensure that all employees involved in the management and maintenance of property managed by NSH or who are liable to be exposed to asbestos receive adequate information, instruction and training. All contractors who are liable to be exposed to asbestos will be required to show evidence of similar information, instruction and training to their staff, as part of their appointment for any works or contract.
- 4.7 NSH will not undertake or contract out any work to any building without adequate information on the nature, condition and extent of any asbestos containing material likely to be disturbed. The asbestos register should be consulted prior to any works taking place. Works orders for responsive repairs shall indicate the details of asbestos information within a specific property.

- 4.8 NSH must ensure that where asbestos is to be left in situ, compliance with the asbestos management plan is followed.
- 4.9 Prior to the undertaking of ANY work (whether by NSH staff or contractors), anyone responsible for commissioning the work must consider whether that work will expose, or is liable to expose, any person to asbestos.
- 4.10 Before commencement of any work which will expose, or is likely to expose, any person to asbestos, the person responsible for commissioning that work shall ensure a suitable and sufficient risk assessment has been undertaken of the potential risk created by any exposure.
- 4.11 Any person (whether employed by NSH or not) who undertakes work that exposes, or is liable to expose, any person to asbestos will ensure that all control measures identified by the work assessment are implemented. This information must ensure that all staff members are aware of the results of any work assessment, the risk to health of asbestos, precautions to be observed and any other information required to safeguard themselves and others.
- 4.12 NSH will maintain a register of all identified asbestos containing material for each domestic where a survey has been undertaken and for all non-domestic premises. NSH will ensure the register is kept up to date and be available for inspection and accessible at all times.
- 4.13 Any properties managed by NSH and let on a long term basis are included within the document.
- 4.14 Any officer commissioning work must ensure that any person undertaking work on that property is informed of the location of any asbestos containing material which is in the vicinity of that work.

5.0 Legislation

- 5.1 The principle legislation bearing on the management of asbestos risk are;
- The Health and Safety at Work Etc Act 1974
 - Control of Substances Hazardous to Health Regulations 2002
 - Management of Health and Safety at Work Regulations 1999
 - The Control of Asbestos Regulations 2006
 - Approved Code of Practice L28; (Fourth Edition – Revised 2002)
 - "Work with asbestos insulation, coating and asbestos insulating board".
 - Approved Code of Practice L27; (Fourth Edition – Revised 2002)
 - "Work with asbestos that does not normally require a licence".
 - Approved Code of Practice L127; "The Management of Asbestos in Non-domestic Premises".
- 5.2 All work with asbestos containing materials is controlled under the control of Asbestos at Work Regulations 2006. The object of these regulations, which are made under the Health and Safety at Work Act 1974, is to minimise worker's and anyone else's exposure to asbestos fibres both within the workplace and the surrounding area.
- 5.3 Approved Codes of Practice and a number of technical guidance notes have been produced by the Health and Safety Executive (HSE) respectively, designed so that

building managers, employers, employees and contractors can achieve compliance with the requirements of the regulations.

- 5.4 The majority of projects which involve work with asbestos spray coating, thermal insulation materials and asbestos insulating boards require the contractors to be licensed under the Asbestos (Licensing) (Amendment) Regulations 1998.
- 5.5 There is a requirement under CAR 2006 for both a risk assessment and a written "plan of work" to be prepared before work with asbestos commences or is resumed. The purpose of both the risk assessment and the plan of work are to minimise exposure to asbestos fibres and should be undertaken by the contractor appointed to undertake the works. The relevant enforcing authority (HSE) must be notified of any work with asbestos as detailed in the regulation.

6.0 Asbestos Surveys & Data Capture

- 6.1 NSH assess the presence of asbestos through a structured programme of surveys, sample testing and risk assessments. The Asset Management and Investment Team are responsible for the management and delivery of this process.
- 6.2 A type 3 asbestos survey is carried out prior to any major refurbishment taking place within a property.
- 6.3 Indicative surveys detailing the possible presence of ACM's are carried out periodically. An asbestos survey to all common parts and residential dwellings is also undertaken where planned maintenance works, which is likely to disturb the fabric of the building, is proposed.
- 6.4 The type 2 surveys will involve an inspection of all common parts of the building and a sample of residential dwellings within the programme. This will identify any potential asbestos with the property or scheme. This information is recorded on the Asbestos Register. An initial risk assessment is then undertaken to determine the following action:
 - Remove the material whilst work is undertaken in the property or
 - Put in place a management plan

7.0 Information to Tenants

- 7.1 Where asbestos is identified in a property, residents will be informed by a letter detailing the location, nature and action taken to manage any risk. This letter will be issued by the Property and Estates Team for responsive repairs or the Asset Management and Investment Team should the survey relate to major planned works. The letter will be accompanied by NSH's asbestos information leaflet explaining the issues relating to the risks and management of asbestos.
- 7.2 Where an asbestos survey is to be undertaken within a property NSH will write to the tenant informing them of the action. This letter will be accompanied by NSH's asbestos information leaflet explaining the issues relating to the risks and management of asbestos.

- 7.3 If there is or has been any significant risk, or perceived risk of exposure of tenants to loose asbestos fibres, then a face to face meeting will take place with the tenant to discuss the matter. The Repairs Manager or Contracts Manager will be present at this meeting and document the discussions with the tenant and issue details of the discussion to the tenant as soon as practically possible.
- 7.4 Where leaseholders are present within a particular scheme and NSH are aware of the presence of asbestos following a recent asbestos survey clause 7.1 should be followed and the leaseholder should be advised of the presence of asbestos as a good practice measure. A copy this letter shall be issued to the Leasehold Officer.
- 7.5 Where any property is to be sold the Leasehold Officer shall liaise ensure that any information relating to asbestos which is available from the asbestos register is passed to the purchaser upon completion of the sale of the property.

8.0 Training

- 8.1 NSH are to ensure that all officers who are required to manage planned or responsive maintenance or other intrusive works within properties are trained on asbestos awareness. This is aimed to provide officers with sufficient knowledge to deal with ACM's when managing responsive repairs or managing planned maintenance programmes.
- 8.2 Asbestos awareness refresher training will be provided to all officers who are required to manage planned maintenance or other intrusive works within properties on an annual basis.

9.0 Asbestos Register

- 9.1 NSH's asbestos register contains a full property list that holds the information detailed below. Information from the register will be issued to contractors before any works commence.
- Property address, archetype and room where asbestos is likely to be located
 - Location and type of asbestos within a room
- 9.2 All contractors shall be issued with the up to date property list with archetype details and likely location of asbestos in the property. Once in receipt of a works order the contractor shall cross reference the property to determine the presence of asbestos. Should asbestos be present the contractor needs to ensure any work undertaken in an area where ACM is present is in line with current asbestos regulations.
- 9.3 NSH will utilise the surveys at various property archetypes to inform the asbestos register.
- 9.4 A copy of the asbestos survey for all community centres and supported housing schemes should be passed to the relevant scheme manager for retention. This should be made available to all contractors who are to undertake works within the building prior to any works commencing.

10.0 Asbestos Management Plan

- 10.1 Where the asbestos register highlights the possible presence of asbestos an action plan is in place to manage asbestos within the building. The asbestos register will determine the future actions required to manage and control the presence of any ACM's. This will be a programme of inspections or actions to make safe asbestos, such as encapsulation or possible removal. These actions are detailed in 10.2.
- 10.2 An asbestos assessment score for each ACM has been produced that combines the algorithm generated material assessment and priority assessment. This risk assessment forms the basis of asbestos management and will be used to determine the management and controls necessary. These parameters are detailed below:

Asbestos Assessment Score	Level of Risk	Action
0	No risk	No action necessary.
1-13	Minor/low risk	Periodic visual inspections required usually every 12 months.
14-17	Medium risk requiring near term attention	Programmed removal within specified timescale – normally 12 months or as specified within the survey.
<i>18 or more</i>	<i>High risk material requiring urgent attention</i>	<i>Programme immediate removal. Where delay of removal seal/encapsulate and position approved warning labels to avoid disturbance.</i>

- 10.3 Where no information regarding ACM's is available, it must be presumed that asbestos is present.
- 10.4 The overall aim of long term asbestos management is to ensure that all ACM's, through re-inspections, remedial or removal works are effectively managed and risk is reduced to its lowest practical level.
- 10.5 All ACM's will be re-inspected at intervals determined by risk assessment and inspections will be carried out by competent persons. This information taken from this assessment will be used to update the asbestos register.
- 10.6 The Asset Management and Investment Manager will ensure the implementation of the asbestos management plan.
- 10.7 Where periodic inspections of possible presence of ACM's are required as part of the management plan this should be undertaken in conjunction with the cyclical programme, or where required an individual survey will be arranged. The information taken from this visit will be used to update the asbestos register. The Asset Management and Manager will ensure that revisits relating to asbestos are undertaken in line with the findings of the asbestos survey and that the asbestos register is updated accordingly.
- 10.8 Where periodic inspections are programmed this should be undertaken on a sample of properties which have not received a recent asbestos survey but have been highlighted as containing asbestos through cloned survey information.

11.0 Planned Maintenance

- 11.1 Prior to any planned contract commencing NSH must satisfy themselves that any contractor employed by NSH are competent in managing asbestos on site and that they have adequate systems in place to deal with any potential asbestos, including ensuring that their operatives are adequately trained to recognise asbestos containing materials and are aware of the procedures upon finding any such materials.
- 11.2 Prior to any works programme commencing, the officer managing the project is to check all properties listed within the programme against the asbestos register and ascertain those properties where asbestos-containing material has been found. This is best done prior to tendering or negotiating a contract, so that the contractors are able to plan and cost for dealing with any potential asbestos problems within the contract.
- 11.3 Prior to any works programme commencing, a sample number of properties within the programme should have an asbestos survey undertaken to highlight the possible presence of asbestos containing materials. Following completion of the survey the information is to be added to the asbestos register and provided to the contractors working on the programme. The officer managing the project will ensure the relevant number of property surveys is commissioned.
- 11.4 The survey information is to be passed to the contractor, along with any surveys, risk assessments and management plans for dealing with the located ACM's prior to any works commencing. The managing officer is to ensure that the contractor confirms the adequacy of information prior to work commencing.
- 11.5 If the identified ACM is to be worked on or work is to be carried out in the near vicinity of that material, the contractor is to provide a method statement giving details of safe systems of working on or near the asbestos containing material. Only when NSH are satisfied with the method statements should a permit to work be issued to the contractor to allow them to start work in this area.
- 11.6 It may be prudent prior to either the contract commencing or the contractor starting work on a specific property for the asbestos to be removed. If this is the case, an approved asbestos removal company should be employed to carry out this work and the Health and Safety Executive notified as appropriate of the removal works and a Certificate of Reoccupation provided by that contractor on completion of any removal works.
- 11.7 All information regarding the removal of asbestos, the identification of the presence of ACM's etc is to be provided to the Systems and Information Officer who is responsible for the management and upkeep of the asbestos register.
- 11.8 The relevant enforcing authority (HSE) must be notified of any work with asbestos where required under the regulations.

12.0 Responsive Repairs

- 12.1 Where a works order is issued to the contractor they should ensure that the process detailed in section 9 is followed. This involves cross referencing the property list to

determine the presence of asbestos within a building and ensuring that the relevant measure are followed when carrying out works in an area where ACM is present.

- 12.2 Should a contractor locate the presence of asbestos whilst works are being undertaken within a property the emergency procedure should be followed.

13.0 Minor Works

- 13.1 Non-licensed work may be carried out by competent direct labour staff and/or contractors. This includes work that can be carried out by an individual working for no more than one hour in seven consecutive days, or work where the time spent by all those involved does not exceed two hours.
- 13.2 The HSE has recognised that certain works of a minor nature whether involving licensable or non licensable material, can be carried out by people other than licensed contractors. This is the case for work carried out during maintenance operations, such as plumbing and electrical installations.
- 13.3 Any such work carried out shall be subject to a risk assessment undertaken on a job-by-job basis by a competent person. Working procedures shall strictly follow the method statement produced following the risk assessment as well as the guidance stated in the HSE publication HSG210 (Asbestos Essentials Task Manual).
- 13.4 The Task Manual offers practical guidance on the way minor works should be carried out and the precautions required. For licensable material, minor works are defined as work that can be carried out by an individual working for no more than one hour in seven consecutive days, or work where the time spent by all those involved does not exceed two hours.
- 13.5 Tasks covered by the manual include drilling holes in asbestos insulating board, removal of single asbestos insulating board ceiling tile, and drilling holes in asbestos cement and other bonded materials.

14.0 Contractors

- 14.1 A contractor information sheet which details NSH's approach to Asbestos has been issued to all contractors who are currently enrolled on the approved list of contractors. This details the general principles of NSH's approach to managing asbestos, details the extent of information which is held on the asbestos register and highlights the procedure for a contractor who is likely to work in a property where NSH are aware of the possible presence of asbestos.
- 14.2 Where a contractor is commissioned to undertake removal or encapsulation of asbestos NSH will ensure that the contractor is a licensed asbestos removal contractor and is competent to undertake such works.

15.0 Procedure for occurrences when Asbestos is identified on site

- 15.1 Where unidentified asbestos is found within a property or scheme, the following procedure is to be adopted;

- 15.2 If during the course of any work, the contractor discovers the possible presence of Asbestos Containing Materials, they must cease work and notify the Contracts Manager or Repairs Manager immediately.
- 15.3 The contractor must ensure the works are left in a safe and satisfactory condition and that no danger and as little inconvenience as possible to the tenants or occupier results.
- 15.4 Ensure that access to the affected area is prohibited.
- 15.5 The Contracts Manager or Repairs Manager is to arrange for a specialist asbestos consultant to carry out a survey and sample analysis of the suspect material immediately and provide a report, risk assessment and management plan. This information is to be added to the asbestos register and also provided to the contractors.
- 15.6 Dependant on what is found during the survey, a number of options may be available to NSH in respect of dealing with the Asbestos Containing Materials, and these are;
- Remove the asbestos
 - Enclose or encapsulate the material and manage its presence.
 - Do nothing due to its location and condition and prepare a management plan detailing future action.
- 15.7 If the asbestos is to be removed or encapsulated, an approved asbestos removal company should be employed to carry out this work and the Health and Safety Executive notified as appropriate. A Certificate of Reoccupation should be provided by the asbestos removal company on completion of any removal works.
- 15.8 If the identified ACM is to be worked on or work is to be carried out in the near vicinity of that material, the contractor is to provide a method statement giving details of safe systems of working on or near the asbestos containing material. Only when NSH are satisfied with the method statements should confirmation to proceed the works be issued to the contractor to allow them to start work in this area.
- 15.9 Where asbestos is identified in a property, the residents will be informed by a letter detailing the location, nature and action taken to be taken with any identified asbestos. The Contracts manager or Repairs Manager will ensure this letter is issued to a tenant confirming the presence of asbestos within the property.

16.0 Emergency Procedure

- 16.1 The Control of Asbestos at Work Regulations set control limits for asbestos exposure. In an emergency it will not always be possible to carry out air monitoring to determine if the control limits have been exceeded. It is therefore necessary to treat all emergencies as though the control limits have been exceeded. The steps for dealing with an unpredicted release of asbestos are as listed below;
- 16.2 Immediately clear the area of all persons.

- 16.3 If the emergency is contained in a single area, such as a room, isolate that room by closing all doors.
- 16.4 Ensure that access to the affected area is prohibited.
- 16.5 Inform the person responsible for the property i.e. Contracts Manager, Repairs Manager, and Housing Officer if there are tenant or decant issues which need to be dealt with.
- 16.6 An approved contractor should be immediately employed to access the area and decide on further action to be taken.
- 16.7 Carry out a risk assessment before determining the method of disposal, repair/sealing and clearance of any loose asbestos fibres.
- 16.8 Carry out any remedial works in accordance with approved Codes of Practice and legislative requirements.
- 16.9 Keep the area clear of anyone not involved in remedial action, until air monitoring has taken place and concentration levels reduced to an acceptable level. A certificate of reoccupation is to be provided to NSH by the asbestos contractor, before the area can be accessed.
- 16.10 Ensure all those affected by the incident are kept informed of progress by written communication.
- 16.11 In the event of fire or accident within a property, the Property and Estates Manager or Asset Management and Investment Manager will liaise with the emergency services and ensure that any information relating to the presence of asbestos is forwarded to the relevant person.
- 16.12 Where damage to asbestos occurs whilst the material is in situ, the emergency procedure for dealing with asbestos should be followed. This could be as a result of third party physical damage or possible water leak to the property.

17.0 Responsibilities

- 17.1 NSH has an explicit legal duty to survey, assess and manage the risks from asbestos. The Chief Executive is ultimately responsible for the implementation of the Asbestos Management Plan.
- 17.2 General responsibilities follow that of NSH Health and Safety Policy, with Directors and Business Managers having overall responsibility for ensuring that this plan is implemented within their specific areas.
- 17.3 The Asset and Investment Manager in liaison with others will ensure, so far as is reasonably practicable, devise and maintain a system for identification and management of asbestos containing materials.
- 17.4 The Asset Management and Investment Manager is responsible for the following:
 - Arranging for surveys of premises to be carried out to determine so far as is reasonably practicable, the location and condition of asbestos containing materials (ACMs).
 - Ensuring immediate action is taken to control imminent risks from asbestos.

- Presume that materials contain asbestos unless there is strong evidence to prove that they do not.
- Maintaining an electronic record of the locations, condition, maintenance and removal of asbestos and presumed ACMs.
- Assessing the risk of exposure and document actions necessary to manage asbestos.
- Ensuring the effective management of ACMs depending on the results of the risk assessment, for example, seal, repair or remove asbestos, if there is a risk of exposure due to its condition or location.
- Retaining copies of clearance certificates following removal and updating the information on Academy.
- Putting in place a system to monitor the condition of ACMs within all relevant properties on a regular basis dependant on the risk.
- Putting arrangements in place to ensure that asbestos information is provided to all contractors and others working in the vicinity of ACMs.
- Ensuring that the asbestos information remains up to date and take further action as necessary.
- Ensuring that where asbestos has been identified in residential premises tenants are notified of the location, hazards to health, appropriate precautions to take and the need to report damaged suspected asbestos materials to the Property and Estates Manager.

17.5 Contracts Manager, Repairs Manager and Surveyors will:

- Consult the asbestos register for information on asbestos as part of the planning process. Where insufficient information exists on the register, an asbestos survey must be arranged or assumed asbestos is present.
- Advise any change of condition of ACMs which would change the risk assessment and the management of the ACM.
- Ensure that, when required by legislation, only specialist contractors licensed by the HSE are used to undertake works involving asbestos.
- Ensure arrangements are put in place so that any works which may disturb ACMs, comply with current legislation.
- Ensure in all cases that risk assessments and method statements are obtained from the contractor carrying out the work prior to commencement.
- Ensure that prior to any minor works that a risk assessment and control measures are put in place.
- Monitor compliance with the risk assessment and method statement/plan of work.
- Make information available to those who may come into contact with or disturb ACMs. Information shall be provided in a written and or electronic format and shall be correct on the date it is presented.
- Ensure that prior to the commencement of any works which may have the potential to bring occupants into contact with ACMs, the asbestos register is consulted and information used within the risk assessment and plan of work.
- Prior to commencement on site of planned works, receive written confirmation from the Principal Contractor that all personnel employed on that site, either directly or sub-contracted have been informed of the location of identified ACMs.
- Ensure that all contractors at risk of disturbing ACMs are aware of their requirement to provide appropriate training and information to their operatives, which includes recognition of suspect asbestos materials and the emergency procedures to be taken.
- Ensure copies of monitoring/clearance certificates are provided and that the asbestos register is updated accordingly.
- Provide the contractor with a copy of this document.

17.6 Contractors Responsibilities

- Confirm that all operatives to be used on NSH work and that of sub-contractors have received as a minimum Asbestos Awareness Training.
- Understand their responsibilities and contents of NSH Asbestos Management Plan.
- Inform their operatives and those of any sub-contractors of the emergency procedures in the case that they discover/disturb suspected ACMs.
- Provide NSH with a copy of their risk assessment and method statement/plan of work prior to commencement of work.
- Report any defects or suspected ACMs prior to starting/continuing with work.
- Make full and proper use of any control measures put in place for working with or adjacent to ACMs, for example, PPE, RPE.
- Comply with asbestos legislation, guidance and good practice.
- Follow carefully all the procedures set out in the method statement for the works.
- Keep the work place clean.
- Eat and drink only in agreed locations.

17.7 Human Resources Manager

- To maintain records of exposure/suspected exposure to ACMs on staff records for 40 years from the date of the last entry.
- Where necessary arrange for counselling or occupation health advice following an exposure or suspected exposure to ACMs.

17.8 All Employees will:

- Immediately report any damaged, disturbed or suspected ACMs to their manager and follow the emergency procedures within this document.
- Comply with all control measures, including respiratory protective equipment and protective clothing, provided to protect employees and others.
- Follow carefully any risk assessment or method statement.
- Report any defects concerning control measures to their line manager.
- Comply with the Asbestos Management Plan.

18.0 Monitor, Review and Audit

- 18.1 The management of asbestos will be reviewed every 12 months to ensure information held is correct and that the requirements of legislation are met. This action will be undertaken by the Asset management and Investment Manager.
- 18.2 The Asset Management and Investment Manager shall also ensure, as part of the review, that the management procedures in relation to managing asbestos in NSH properties are working effectively.

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