LUTON COUNCIL,
BUILDING AND TECHNICAL SERVICES
CENTRAL DEPOT
KINGSWAY
LUTON
LU4 8AU

Housing Asset Management Services

Asbestos Management Plan and Policy

In accordance with the Control of Asbestos Regulations 2012: Regulation 4 – Duty to Manage Asbestos in Housing Stock Premises.

ISSUE 10:

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Key to Terms:

The following terms and abbreviations used within this document, are explained below:

AAC- Appointed Asbestos Consultant
ACMs - Asbestos-Containing Materials.
ACOP - Approved Code of Practice.
AIB - Asbestos Insulation Board.
ASG - Asbestos Steering Group
AA Woods - Appointed asbestos removal contractor (licensed)
BOHS - British Occupational Hygiene Society.
BTS - Building and Technical Services (Luton Council) Direct Labour force
CAR 2012 - Control of Asbestos Regulations 2012.
Capita - Housing Management Information Operating System (also referred to as IBS)
CDM - Construction (Design and Management) Regulations.
Client - Housing Asset Team
Penningtons - Appointed asbestos surveying contractor / consultant
LARC- Licenced Asbestos Removal Contractor
Luton Council Luton Council Housing Services.
HSE - Health & Safety Executive.
MAS - Material Assessment Score.
PAS - Priority Assessment Score.
PPE - Personal Protective Equipment.
ALPHATRACKER - On line Asbestos Survey Database hosted by web portal by Penningtons Ltd
UKATA - United Kingdom Asbestos Training Association.

RECORD OF IMPLEMENTATION AND REVIEW OF THIS PLAN.

THIS DOCUMENT APPLIES TO ALL HOUSING STOCK PREMISES MAINTAINED BY BUILDING AND TECHNICAL SERVICES, LUTON COUNCIL AND IS DEVELOPED FROM, AND TO BE USED IN CONJUNCTION WITH THE LUTON COUNCIL 'ASBESTOS-CONTAINING MATERIALS IN BUILDINGS: GUIDANCE' DOCUMENT.'

IT HAS BEEN DRAWN UP BASED UPON THE USE OF INFORMATION HELD ON THE ASBESTOS SURVEY DATABASE SYTSEM MAINTAINED BY LUTON COUNCIL.

DOCUMENT CONTROL			
ASBESTOS MANAGEMENT PLAN AND POLICY			
Author:	Abdul Kahir		
Effective from:	01/10/2012		
Owned by:	Housing Asset Management Team		
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Authorised by Duty Holder Signature:	**Mo Harkin**	**Maureen Harkin**	**Service Director**
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Authorised by Duty Holder Signature:	**Patrick Odling-Smee**	**Patrick Odling-Smee**	**Service Director**
Issue No:	**6.0**	**Date:**	01/05/2020
Authorised by Duty Holder Signature:	**Claire Astbury**	**Claire Asbury**	**Service Director**
Issue No:	**7.0**	**Date:**	01/08/2021
Authorised by Duty Holder Signature:		**Colin Moone**	**Service Director**
Issue No:	**8.0**	**Date:**	26/07/2023
Authorised by Duty Holder Signature:		**Colin Moone**	**Service Director**
Issue No:	**9.0**	**Date:**	03 July 2024
Authorised by Duty Holder Signature:		**Mark Fowler**	**Deputy Chief Executive/Corporate Director Population Wellbeing**
Issue No:	**10.0**	**Date:**	18 September 2025
Authorised by Duty Holder Signature:			**Service Director - Property and Construction**

Revision	Date	Description of changes	Update or consultation carried out ? Who	Reviewed by
1.0	May-2012	Draft	Initial draft for review	KA(ABDUL KAHIR)/AK (ALAN KEERS)
1.1	October-2010	Updated	Reviewed by Julian Ransom (RIDGE) draft and revisions incorporated	KA(ABDUL KAHIR)
2.1	Mar-2013	Review	Review by Andrew McDonald (Environtec)	KA
2.2	Nov-2013	Updated		KA
3.0	April 2014	Review Updated	Review by Zurich	KA
4.0	September 2015	Review		KA
5.0	May 2019	Review		KA
6.0	May 2020	Review		KA
7.0	August 2021	Review		KA/HA/MH (Michele Hart) TK(Tim Keogh)
8.0	June 2023	Review		KA/H.Anthony
9.0	June 2024	Review		RW/LB/KA/HA
10.0	June/July 2025	Review		DG/KA/HA

Policy

Scope

1.1 This policy applies to; Luton Council Housing Department (Luton Council) Building and Technical Services, the trading arm of Luton Council (BTS), tenants, internal and external contractors, visitors and the public. It covers all properties, premises and areas owned by Luton Council Housing Department only for which it holds a maintenance responsibility. From here on Luton Council Housing Department will be referred to as Luton Council.

Policy Statement

2.0 As owners and managers of the housing stock, Luton Council acknowledge and accept our responsibility and duty of care towards occupiers, employees, contractors, visitors and the general public and undertake our activities in such a manner as to maintain their health and safety.

These responsibilities are derived from the Management of Health & Safety at Work Regulations 1999 (Management Regs), Health and Safety at Work Etc. Act 1974 (HASAW), Regulation 4 of The Control of Asbestos Regulations (CAR) 2012 to identify and assess significant risks relating to asbestos, and to safely manage Asbestos Containing Materials (ACMs).

Associated Approved Codes of Practice and official guidance published by the Health and Safety Executive shall be taken as our adopted standard.

Appendix 1 shows the structure responsible for delivery of the Asbestos Policy and Management Plan

2.1 To achieve this, The Duty Holder of this Policy and Management Plan, The Service Director for Housing will appoint Responsible Persons to fulfil the delegated actions and responsibilities.

2.2 To manage and control risks from ACMs, the measures identified in this Asbestos Policy and Management Plan shall be adopted.

2.3 The aim is to put in place all possible plans and preventative measures to avoid an emergency. However, if an emergency should arise, we will implement the procedures held in Appendix 5

2.4 Presence of ACMs does not itself present a significant risk to health if the materials remain in good condition and undisturbed. Risk occurs when fibres are released into the air and inhaled.

3 Policy and Management Plan Aims And Key Objectives

3.1 The aims and objectives are summarised as follows:

- provides clear lines of responsibility in Luton Council for management of asbestos.
- specifies individual responsibilities in the management of asbestos.
- clarifies the Luton Council approach to surveying properties.
- provides a commitment to customer communication regarding asbestos.
- provides a timetable (See Appendix 2) and Criteria for review of Asbestos Policy and Management Plan, and
- Clarifies the method of reviewing and monitoring asbestos compliance.

- Identifies how Luton Council and Client (Housing Asset Team) will work together with BTS and external contractors on Asbestos Management.

4 Our Commitments

As a minimum, we will:

- take reasonable steps to locate ACMs in our premises and check their condition.
- presume that materials contain asbestos unless there is strong evidence to indicate otherwise.
- Maintain accurate, accessible and up-to-date records of the location and condition of known and presumed ACMs.
- provide staff with appropriate training based upon roles and responsibilities.
- assess the risk of the likelihood of anyone being exposed to ACMs.
- prepare a plan to manage that risk and put it into effect to ensure
  - any material known or presumed ACM is kept in a good state of repair and re-inspected as defined in the associated Management Plan (AMP)
  - any damaged ACM is repaired (encapsulated) to prevent the release of asbestos fibres or, if necessary, removed
  - information on location and condition of known and presumed ACMs on our premises is given to anyone whose activities have the potential to disturb them
  - in the case of an unplanned incident, such as accidental damage of an ACM, emergency procedures set out in the AMP are followed.

5 Management Responsibilities

5.1 Effectively managing the risks from known and presumed ACMs. The structure for delivering this is shown at Appendix 1

5.2 The responsibilities of Individual Duty Holder, Responsible Persons, Appointed Persons and administrators, as identified in the Asbestos Management Plan, are communicated and agreed, with staff trained to the correct level of competence to discharge their responsibilities

5.3 Ensure the Asbestos Policy and Management Plan, Procedures and Guidance are adhered to.

5.4 Other personnel within the wider Luton Council and tenants, are provided with all relevant information in an appropriate format.

6 Surveying

Types of Survey

6.1 The first step in managing the risk from ACMs is to undertake a suitable and sufficient assessment (Management Survey) as to the presence of ACMs, their location, fibre content, product type, and condition (Material Risk); together with an assessment of the risk of that material causing harm based on accessibility and the activities carried out in the vicinity (Priority Risk) of the ACM. Luton Council have a risk-based programme which will result in 100% of the properties for which they hold a responsibility being surveyed and asbestos information recorded and made available to all persons identified above.

6.2 Where no survey information is available and proposed works have the potential to disturb ACMs, Luton Council will commission an intrusive (Refurbishment & Demolition) Survey, within the restrictions imposed by occupied premises and HSG264 methodology, to ascertain the presence of ACMs..

6.3 In addition Luton Council Housing also undertake:

- **Monitoring Re-Inspection Surveys** - Whilst there is no prescriptive template within HSE guidance the requirement for periodic re-inspection of identified ACMs is clear
- **Sampling and Analysis** – of suspected or previously unidentified ACMs
- **Quality Control Surveys** – These can be carried out by the asbestos surveying company carried out as part of their procedures, or by an independent surveying company employed by Luton Council.

6.4 HSG 264 identified properties constructed after 1999 as having no significant risk of containing ACMs. Therefore Luton Council will not carry out surveys on properties of this type unless there is significant reason to believe that ACMs may be present.

6.5 When acquiring a property constructed pre-2000, Luton Council will ensure a Management Survey is completed before or soon after purchase/transfer of ownership etc.

6.6 Any decision-making process which forms part of any survey prioritisation shall be formally documented and identified as part of the Management Plan. Consideration shall also be given to this in relation to surveys during Voids periods. **Appendix 5.11.**

7 Risk Assessment and Prioritisation

7.1 Following the identification of ACMs (sampled or presumed), individual risk assessments will be carried out and recorded, in accordance with HSG 264 and HSG 227 by the Approved Asbestos Consultant (AAC) in conjunction with the Responsible Person and the Luton Council Procedures

8 Compliance

8.1 Luton Council will formally monitor and review compliance with this policy and the implementation of our Asbestos Management Plan and Procedures.

8.2 Luton Council will ensure full quality control and monitoring is carried out on surveys and works undertaken as detailed in the Management Plan and Procedures.

8.3 If anyone is exposed to asbestos whilst on our premises a record will be kept on file for a duration of 40 years and subject to the Luton Council Data Protection policy. The information will be sent to Housing Management Team for entering into the property file. For any operatives involved this will be kept in the employee file by BTS' internal HR team

9 Luton Council Housing Asbestos Information

Asbestos Data Storage

9.1 Luton Council holds all asbestos surveys and removals records electronically on the Council servers, Capita IBS (Potentially moving over to Total Mobile) System and online portals, AlphaTracker hosted by the Council's appointed Surveying Consultant Pennington Choices for surveys and EASYBOP hosted by the appointed Asbestos Removal Company AA Woods. Asbestos Register information is accessible to; staff, Luton Council (Client and Contracting), external contractors and appropriate outside parties; to ensure safe working and reduce the risk of exposure. To provide appropriate people with up to date asbestos information and records within our portfolio, this will be maintained, updated and made available through access to this Portal..

9.2 Other parties such as the general public will be prevented from coming into contact with ACMs where they are likely to damage or disturb them. Risks from the unlawful activities of trespassers, vandals, etc. are reduced by labelling (see below for labelling approach),

preventing accessibility and provision of adequate prevention of unlawful access to premises.

9.3 A labelling policy for ACMs within General Needs properties is adopted by BTS. Residents are provided with a register extract identifying the location of any ACMs in their home as described in the Management Plan and Procedures. Consideration is currently being given to providing this in a drawing format.

9.4 ACMs will be labelled in communal areas and plant rooms etc. where appropriate, i.e. not in public view.

9.5 We require any contractor working on a residents home to obtain asbestos information from the asbestos register during planning and prior to commencing work. Access to the register will be monitored and audited

All employees and contractors are instructed to immediately report to Luton Council any damaged ACM and/or any suspected ACM that may be encountered during the course of their work.

10 Repairs and Maintenance

10.1 Risk assessments shall be carried out before any planned or reactive maintenance with potential to disturb ACMs.

10.2 Luton Council generally adopt a presumption of presence of ACMs when planning programmed works due to the age profile, etc. of its stock. As a result, R&D surveys are carried out prior to such work taking place. In all cases the contractor is responsible for conducting their own additional risk assessment before commencing work and reassess the risk dynamically as work progresses.

10.3 Residents are informed of forthcoming work, any asbestos related risks, and how Luton Council will manage and control those risks. Where identified as necessary, Luton Council will arrange temporary accommodation where the risk is considered sufficiently high.

10.4 It is impractical to carry out an asbestos survey on every responsive repair. Luton Council staff issuing repair jobs shall communicate to the contractor whether ACMs are identified as present at the relevant property. Operatives are able to identify this information on their PDAs. It is the responsibility of the contractor to conduct a specific risk assessment before carrying out any works. All BTS Operatives and contractors are Asbestos Awareness trained to assist and enable this. A review of specific risk assessments for works with significant risks must be confirmed by the client.

11 Asbestos Removal or Remedial Works

11.1 Any licensed asbestos removal or remedial works will be carried out by the Luton Council appointed licensed asbestos removals contractor (LARC - currently AA Woods). The AAC will supervise these works as per the terms of their contract to include (but not restricted to) inspecting any enclosures, decontamination units and transit routes, carrying out 4-stage clearance procedures and providing clearance/reoccupation certificates. Non-licensed works may be carried out by competent BTS operatives or the LARC as appropriate, with the AAC instructed where considered necessary.

11.2 Removal or remedial works will be triggered when identified:

- as a result of intrusive responsive repairs
- as a result of planned maintenance, demolition or refurbishment when a particular material's Overall Risk Assessment Rating reaches the level of Medium* (a score 15 or above) *However any score of 9 or higher will be reviewed for appropriate remedial action.*
- where asbestos has been damaged, or its condition has deteriorated sufficiently to warrant it

11.3 We will use only approved licensed asbestos contractors for removal of licensed and notifiable non-licensed ACMs to ensure compliance with legislation, approved codes of practice and guidance. Certain Low Risk, non-notifiable work is carried out by BTS operatives - for example (but may not be restricted to); sinks (bitumen pad), toilet cisterns (when removed complete), fuse boxes (removed as an entity).

11.4 When notifiable asbestos removal or remedial works have been completed (excluding non-licensed external works), an independent United Kingdom Accreditation Service (UKAS) accredited analyst will be engaged to ensure that the area is ready for reoccupation.

12 Contractor Requirements

12.1 Contractor competence is assessed at procurement stage, to ensure we only use competent, trained and financially viable contractors.

12.2 All Licensed and Notifiable Non-Licensed asbestos works will be undertaken by the LARC.

12.3 Non-Notifiable Non-licensed works can be undertaken by competent BTS employees or subcontractors employees, upon provision of proof of competence/experience, associated training, appropriate work equipment and methods, risk assessments, plan of work, record keeping/documentation (e.g. consignment notes) and monitoring.

12.4 In the event that customers are unable to assist in enabling works such as moving furniture or clearing rooms due to vulnerability or mobility issues then a referral should be made to housing for an appropriate tenancy audit, following this a decision will be made regarding any assistance the council may provide, this will be on a case by case basis.

13 Equality and Diversity

13.1 Luton Council treat all customers and staff with fairness and respect. We value diversity and work to promote equality and tackle unlawful discrimination. We are committed to supporting customers and staff to access information in a way that suits individual needs. Full details are available in our Equality and Diversity Policy

Management Plan

1.0 INTRODUCTION TO PLAN.

This Asbestos Management Plan has been developed as stated above in the Asbestos Policy document (Section 1)

It should be noted that this Asbestos Management Plan concerns Luton Council domestic housing stock, including communal areas, garages and shops owned by Housing, insofar as they become places of work when maintenance or other work is carried out. Asbestos management arrangements relating to all other Luton Council corporate buildings or assets are covered under separate arrangements and administered directly by Luton Council Property & Construction Team (PCS) Team.

This Management Plan has been developed to operate via two strategies.

Surveyed Properties - The first strategy is for those premises that have previously undergone a '*Management Survey'* in accordance with the requirements and methodology given in HSG264 'Asbestos: the survey guide' which superseded MDHS100 from January 2010. HSG264 surveys represent the most up to date information for the presence of ACMs identified within the Luton Council property portfolio.

Un-surveyed Properties - The second strategy shall be applied for those premises which are yet to be surveyed. In this case Luton Council will employ a 'presumption' of the presence of ACMs to these premises based upon their age, use, form of construction, results of surveys carried out to properties of similar age and construction and any other information which is or becomes available. Summaries of ACMs that can be presumed to be present and the associated building age for surveyed and un-surveyed properties are given in **Appendices 3 and 4.**

Flow chart diagrams on these two strategies are given in **Appendix 5 (5.1 to 5.9)**

The central register for items identified from the asbestos surveys is held upon the asbestos module within the Capita (formally IBS) '*OPEN Housing'* software management system, operated and maintained by Luton Council.

Register data is available to all relevant Luton Council Housing Services and BTS staff (including BTS Trading and their Operatives) directly via the Capita system and the ALPHATRACKER asbestos portal.

Access to data for external contractors is provided via a secure web portal (ALPHATRACKER) remotely hosted by the AAC, currently Pennington Choices. Web access will be transferred to the Luton Council Capita system as soon as development of an equivalent portal facility is completed.

As additional premises are surveyed for the presence of ACMs, details will be added to database, as will any future additions to the Luton Council property portfolio. Similarly, re-inspection survey data will also be added by Luton Council to the database, updating the original survey information to which it relates.

Where intrusive works such as refurbishment works or demolition are proposed, a works specific 'Refurbishment and Demolition survey' as defined in HSG264, will be instructed and undertaken,

It is the view of the Health and Safety Executive that, where possible, ACMs are best managed in-situ, unless their location or condition prevents this. Thus, this Policy and Plan is devised to give reasoned and structured procedures to the management in-situ of individual ACMs within all properties maintained by Luton Council Housing Department.

1.1 Purpose of Plan.

This Plan will detail the specific actions and responsibilities required by Service Director Housing, Luton Council, nominated Duty Holders, Responsible Persons, Appointed Persons, or persons working for the Duty Holders, to maintain compliance with the Control of Asbestos Regulations (CAR) 2012 in the management of asbestos-containing materials in non-domestic premises – Regulation 4.

In effectively managing identified, or presumed, ACMs to all housing properties then Luton Council will comply with current legislation and prevent the exposure to asbestos fibres of any staff, maintenance staff, residents, BTS operatives, contractors and visitors to their properties.

Therefore, the asbestos survey information regarding ACMs identified, or presumed to be present at each property, should be accessed by all relevant staff (maintenance, or otherwise) and contractors who may in the course of their normal duty may come into contact with or disturb the identified or presumed ACMs.

1.2 Availability of the Plan.

One copy of this Plan will be made available in hard copy format, and the master version held and maintained electronically, at the company's head office at the BTS Offices, Kingsway Depot, Kingsway, Luton, Bedfordshire, LU4 8AU under the control of the BTS Manager.

Additional copies of the Plan shall also be issued to the persons acting as the nominated Responsible Persons and Duty Holders for BTS and Luton Council. (Listed in section 2.0).

Electronic copies of this Plan will also be maintained and available upon the Luton Council Intranet and corporate website. These will be available for external contractors to view and download.

1.3 Implementing and Reviewing the Plan.

Once implemented, then it is recommended that the Plan should be reviewed annually, with the outcome, recommendations and remedial steps recorded and made available for referral. The review shall consider:

a) is information about identified or presumed ACMs available and relevant people?
b) are the assessments of these materials still applicable?
c) is the implemented management strategy for these materials sufficient?
d) has training been sufficient, and
e) is the Plan achieving its goals of effective management of ACMs and prevention of exposure to asbestos fibres?

Should a significant change in circumstances occur which indicates that the Plan is not achieving its objectives e.g. damage to ACMs by BTS operatives, or external contractors and the Plan is considered not to be achieving its objectives, it should be reviewed at an appropriate frequency until an effective Plan is in operation. Reviews will be undertaken by representatives of the 'Asbestos Steering Group' (ASG) and forms a component of the annual compliance review criteria, as shown in **Appendix 2.**

A summary of the dates of implementation and subsequent reviews of the Plan are recorded at the front of this document.

2.0 ROLES AND RESPONSIBILITIES (See Appendix 1).

Duties of management, staff, personnel, and internal works operatives, shall be clearly communicated and agreed by all responsible persons and 'Duty holders' to ensure all persons can undertake their duties as stated in this Plan. Communications and feedback detailing agreed responsibilities shall be kept and monitored by the Duty Holder or relevant Responsible Person who shall initiate further training or assistance as deemed necessary.

The Table 1 below summarises the responsibilities of those within Luton Council and BTS, its staff and those of visiting maintenance operatives/workers to properties in regard to the implementation and observance of this plan.

Table 1

Role	Responsibility
Duty Holder, The Chief Executive (Luton Council)	• The Duty Holder has a responsibility to support this policy by ensuring the allocation of resources including an adequate budget, suitable and sufficient equipment, personnel, time and training. • Appoint appropriate 'Responsible Persons' to oversee, control and coordinate. • Ensure that individual the appointed Duty Holder understand and has the necessary training and resources to fulfil their duties under CAR 2012. • At reasonable intervals, review with the appointed Responsible Persons the implementation, observance and performance of this Plan. • Ensure that there are adequate resources available to ensure that the Asbestos compliance is kept.
Responsible Persons The Corporate Director Inclusive Growth.	• The 'Responsible Persons' have been given their authority by the Duty Holder. The position carries with it the authority to put into effect such measures as are required by the CAR2012. • The 'Responsible Person' has a duty to ensure that relevant Guidance and all relevant legislation associated with the management and control of Asbestos are adhered to. The 'Responsible Person' also has a responsibility to ensure records are kept confirming that this policy has been implemented. • The 'Responsible Person' has the overriding authority for the control of Asbestos. They

	have the authority to instruct and enforce where necessary the 'Jointly Accountable Responsible Person' to ensure that all Luton Council sites meet the requirements of Legislation and this policy. The 'Responsible Person' is required to ensure that 'Jointly Accountable Responsible Person's' are trained and competent to carry out the prescribed task on their behalf and to ensure that the 'Responsible Person's' tasks and requirements are duly met. • The 'Responsible Persons' have the authority to appoint a 'Responsible Manager' and 'Jointly Accountable Responsible Manager'. The 'Responsible Manager' and 'Jointly Accountable Responsible Manager' has/have been given their authority by the 'Responsible Persons' to act on their behalf to oversee the day-to-day management of all Asbestos Safety for Luton Council's housing stock, designated by the 'Responsible Person'. The 'Responsible Person' is required to ensure that the 'Responsible Manager' is trained and competent to carry out the prescribed task on their behalf and to ensure that the 'Responsible Person' tasks and requirements are duly met.
Jointly Accountable Responsible Persons The Director of Property, Construction and Housing Delivery	• (Typically for the individual Service Areas within the Department) • The 'Jointly Accountable Responsible Person' assumes the same duties as the 'Responsible Person' delegated by the Responsible Persons. • The 'Responsible Person' is available to assist and offer advice to enable 'Jointly Accountable Responsible Persons' meet their duties. • The 'Jointly Accountable Responsible Person' for the control of Asbestos.
Responsible Manager Head of Building and Technical Services, (BTS) **Jointly Accountable Responsible Manager** Housing Asset Manager (Client).	• To effectively manage identified and presumed ACMs so as to prevent exposure to asbestos to any party whilst on site whether they are there to work or otherwise. • To appoint Jointly Accountable Responsible Persons to oversee the implementation of this Management Plan in relation to properties for which they are responsible. • To appoint a representative to conduct regular reviews and updating of the Management Plan. This may be implemented via the Asbestos Steering Group (ASG).

	• To ensure that re-inspections of identified ACMs are conducted on a routine basis. • To ensure appropriate training is provided to staff in accordance with this plan.
Role	**Responsibility**
Responsible Operator– Senior Project Manager and Asbestos Contracts Administrator (combined role – includes Appointed Persons duties), Housing Asset Management, BTS (Luton Council). Contracts Manager, BTS (Luton Council). Refurbishment Manager, BTS (Luton Council). Repairs Manager, BTS (Luton Council). New Build Manager, BTS (Luton Council) Safety Officer, BTS (Luton Council) Building Safety Manager/offcer	• To oversee the implementation of this Management Plan in relation to properties for which they are responsible. • Ensure that surveys to the premises for which they are responsible are carried out in accordance with current guidance and are programmed to ensure that those properties on programmed maintenance works are given appropriate priority. • To ensure that all relevant parties are informed as to the presence of any identified or presumed ACMs within the property for which they are responsible so that they may act accordingly. • To act as contact in the case of any emergency in relation to asbestos for the property for which they are responsible. • Take responsibility of managing the risk of Asbestos in the operation of all works.
Advisors Compliance –Co-ordinator Contracts Manager, BTS (Luton Council). Refurbishment Manager, BTS (Luton Council). Repairs Manager, BTS (Luton Council). New Build Manager, BTS (Luton Council) Safety Officer, BTS (Luton Council) Project Managers, Housing Officers, Allocations Officers, Housing and Property staff	• Assist the Responsible Operator of any administration of the CAR2012 as required. • To communicate the presence of identified or presumed ACMs, and associated risks, to the occupants of those properties for which they are responsible in conjunction with Tenancy Management and. in line with this policy document. • To make themselves aware of ACMs at properties they will visit and identify to the relevant RP any damaged, deteriorated or previously unidentified ACMs.
All Staff, internal works operatives (BTS Trading), and Visiting Contractors/sub-contractors.	• To make themselves aware of ACMs at properties they will visit and identify to the relevant RP any damaged, deteriorated or previously unidentified ACMs.

	• Observe and implement the requirements of this Management Plan, and to assist in its implementation and maintenance. • Co-operate with the Duty Holders and Responsible Persons in fulfilling their duties to manage asbestos. • Visiting contractors, or internal works operatives (BTS Trading), to also fully observe their own obligations under current legislation and prevailing guidance.
Asbestos Steering Group (cont'd over) Housing Asset Manager Luton Council BTS Senior Project Manager/Asbestos CA Head of BTS Health & Safety Officer BTS Trading Operative Tenant/Resident Representative Asbestos Consultant/Advisor Housing Services Manager	• Terms of Reference and its remit are included in Appendix 12.

2.1 Responsibility of all the above (Table 1).

To ensure the effective management of ACM's identified, or presumed ACMs, the staff of BTS and Luton Council has a responsibility to co-operate with the Duty Holder and their appointed representatives in the management of all ACMs.

The following is a summary of their individual responsibilities:

A. Reduce exposure, and prevent asbestos fibres being released.

B. Ensure all appropriate persons access the relevant Asbestos Register information prior to commencing any works (or request to see the Asbestos Survey Report held on site for specific high-rise and sheltered scheme blocks of flats)

C. Comply with the requirements of this Plan.

D. If any doubt exists treat any insulation, insulating board, or suspect materials as asbestos.

E. Stop works and enquire from the appropriate Responsible Person if they are uncertain as to how to proceed.

F. Protect the health of themselves and that of their work colleagues. If they think asbestos fibres have been released inform their supervisor or line manager immediately and make sure it does not spread to affect other people (see Section 10 of this Plan),

G. Follow procedures set out in the associated Procedures Document by the Duty Holder and their team.

H. Follow the 'Safe System of Work' adopted by the Duty Holder and use safe work methods and equipment provided.

I. Prevent fibre release from any items (tools, carpets furnishings etc.) they suspect may be contaminated with asbestos until they have been fully decontaminated.

J. If they need to work in the vicinity of ACMs follow the job specific risk assessment and plan of work

K. If their job role changes, ensure that they fully understand the revised implications and responsibilities within this Plan.

L. If the nature of the specific maintenance task they are undertaking changes, be sure that they will not interfere with ACMs (if necessary, consult the Register again)

M. Where other areas of the building are likely to be damaged undertake a suitable reassessment of the work, and

N. Apply the suspect asbestos flowchart '*Is Your Work Likely to Interfere with the Building Structure and/or Plant?*' given in **Appendix 5.2.**

O. Emergency procedures Personal decontamination

P. Ensure compliance with other relevant regulations e.g. Building Safety Act 2022 applicable to High rise buildings.

3.0 MANAGEMENT PROCEDURES.

The Duty Holder shall obtain advice from the Appointed Asbestos Consultant (AAC), in order to undertake the most appropriate actions to ensure compliance with CAR 2012, or any future Regulations which may from time to time be in force.

Any AAC employed by Luton Council, shall make available the procedures they will adopt and apply in order to comply with the requirements of current legislation and guidance. In addition, they must be able to demonstrate and exercise independence, impartiality and integrity in undertaking their duties.

3.1 Measures for Managing the Risk.

The steps for effective management of ACMs is built upon the results of surveys carried out to properties. To ensure a structured approach is employed in conducting surveys Luton Council initially carried out a desk top review of all currently non-surveyed properties within the portfolio and place them in one of three levels of priority for surveying: Priority 1, Priority 2 and Priority 3. In assigning the level of priority to a property criterion such as: age, construction, past knowledge/experience in managing the property, planned maintenance works and the best information available at the time regarding the presence of ACMs to that type of property shall be employed.

Management of ACMs includes the application of this Asbestos Management Plan, implementing rolling programmes of surveys and monitoring re-inspections, review of the Management Plan and assessment methodology, ACM treatment and removal.

HSE Guidance, practicalities, risk management, safety and cost issues require ACMs to be managed in situ, and not necessarily removed. Where the ACM is in a good condition and/or out of casual access, it is safest in most cases to leave in place.

In Summary the following will apply:

1. All areas of high-risk asbestos materials will be fully assessed, SEE TABLE 2 BELOW (PGE 20) and where appropriate, monitored or programmed remedial or removal actions will be undertaken. Remaining ACM materials will be monitored and managed.

2. Only those materials likely to pose a serious risk to health or that will be affected by works will definitely be removed prior to the commencement of the works. Other low risk materials can remain, as long as their presence has been addressed in the works risk assessment.

3. Materials which are also considered to be vulnerable to disturbance by virtue of their close proximity to the works, should also be considered for removal prior to the commencement of such works.

4. Other materials adjacent to the area of planned works will preferably be segregated, or at least signed, to prevent damage or indirect disturbance, and shall be monitored for the duration of the planned works.

5. All accidental damage and disturbance will be dealt with in accordance with Appendix 5.10.

6. Asbestos materials will be re-scored for priority, based on any changes in condition and/or levels of occupancy and type of use, with associated recommendations being sourced from a competent person.

7. ACMs will be assessed in light of planned maintenance activities by a competent person and recommendations followed. This may necessitate a more intrusive targeted 'Refurbishment and Demolition' survey to the areas to be disturbed by the work.

In general, Luton Council will follow the recommendations contained within individual survey reports which can fall into one of the risk codes in the next page.

The items 1-7 above are however standard recommendations and as such an individual Duty Holder may observe, or amended the recommendations, as deemed appropriate. Any amendments to recommendations will be based upon the Duty Holder's own intimate knowledge of such criteria as: the remaining operational lifetime of the building, predicted future occupation levels for the building, future refurbishment projects, changes in legislation etc. These will be assessed by Luton Council and then employed to identify the most appropriate and applicable management strategy for each of the ACMs on site. Any such revisions must be recorded in writing, preferably including the rationale adopted.

Determination of the risk presented by an ACM shall be carried out employing standard Material Assessment Scores (MAS) and Priority Assessment Scores (PAS). Once these are added together, then a Risk Code with an appropriate Management Action can be assigned to that material. This methodology and scoring protocol will also be reflected within the asbestos register data on Capita (IBS).

The default scoring assigned risk codes and management actions that apply to each asbestos containing material found are given in Table 2 below.

Table 2 (HSE GUIDANCE)

MAS + PAS = Total Score	Risk Code	Management Actions
Score of **18 and over**	**A**	**High risk** material in **poor condition**: Restrict access and remove as soon as practicable.
Score of **15 -17**, or **damage of 3**	**B**	**Medium risk** material possibly **Damaged or in poor condition**: Remove as soon as practicable.

Score of **9 -14**	**C**	**Low risk** material: Encapsulate/repair and seal any damaged areas within 6 months then monitor condition annually within non-domestic (communal) areas, and within 48 months within domestic areas. Remove prior to significant maintenance or planned works.
Score of **8 and under**	**D**	**Very Low risk** material: Monitor condition periodically within 60 months. Remove prior to significant maintenance or planned works.
Score of **0 (zero)**	**E**	**No Asbestos Detected**

3.2 High, Medium and Low Risk Materials – Risk Codes A-C.

High, medium and low risk materials noted in the survey shall be subjected to remedial measures or removal as appropriate to effectively manage the material and prevent any possible exposure to asbestos fibres.

3.3 Very Low Risk Materials – Risk Code D.

Very low risk items can legally be worked upon or removed by personnel having a documented risk assessment, plan of work, documented training for this type of work, having the appropriate Personal and Respiratory Protective Equipment, can decontaminate themselves and the work area and understands the implications and requirements for generating, and the disposal of Hazardous Waste (all as per the requirements of CAR 2012). Please refer to information provided above regarding the specific works which can be carried out by BTS Operatives.

If liable to damage during the process of removal, notification for some of this work will still be required to the HSE (on-line) before it commences all in accordance with the 'Notifiable Non-Licensed Work' (NNLW) category set out within CAR 2012.
The risk score does not necessarily dictate whether an ACM is non notifiable or licensed.

3.4 Commissioning of Asbestos Remediation/Removal Works.

The Duty Holder or Responsible/Appointed Person, in commissioning removal, treatment or encapsulation of high and medium risk materials (generally classed as being Spray Coatings, Insulation and Insulation Board) shall use the LARC, or, by documented exception, an organisation from the approved list of contractors licensed by the HSE to carry out this type of work. This contractor shall comply fully with all the requirements of their licence, CAR 2012, ACOP L143 '*Work with materials containing asbestos'*, HSG 247 '*Asbestos: The licensed contractors' guide'* and of Luton Council, or it's Appointed Asbestos Consultant in carrying out any works on ACMs.

The activities of the licensed contractor shall be independently audited by the AAC, and by Luton Council or their Appointed Asbestos Consultant at a frequency commensurate with amount, and nature, of the works carried out by them.

All licensable (and most notifiable) works require a four-stage clearance process to be conducted by an independent analyst. This will be undertaken by the AAC.

4.0 MANAGEMENT OF ASBESTOS-CONTAINING MATERIALS TO LUTON COUNCIL PROPERTIES.

Table 2 summarises the general Management Action(s) that can be adopted/developed based upon the Risk Assessment for each type of identified or presumed ACM that may be present.

They have been assigned to give guidance as to the effective management of ACMs for the predicted remaining life expectancy and use of properties.

Specific management action for each ACM is given in the Survey Recommendations and is held on the Asbestos Survey Database. This must be taken as being the most appropriate action for that material in that property and any deviation from the recommended actions shall be discussed with the AAC.

5.0 RE-INSPECTION OF IDENTIFIED ASBESTOS-CONTAINING MATERIALS.

ACMs identified to any property shall be re-inspected in accordance with a pre-determined monitoring re-inspection regime, to ensure that the original assessment of these materials is still applicable, that any associated risks have not altered and thus, that the recommended management action(s) for these materials are still valid.

Those ACMs identified as being of a 'High' risk should be re-inspected at a frequency greater than that which would be adopted for 'Low' risk materials i.e. the level of risk posed by individual ACMs shall dictate the frequency with which those re-inspections will be conducted. Table 3 below gives the recommended re-inspection frequency for ACMs against their assigned risk code.

Table 3

Risk Code	Recommended Re-inspection Frequency	
	Non-Domestic Areas (communal):	**Domestic Areas (Within properties):**
A	Max 3 months (however, material to be removed)	Max 3 months (however, material to be removed)
B	Max 6 Months (however, material to be removed)	Max 6 Months (however, material to be removed)
C	12 Months	48 Months
D	12 Months	60 Months
E	N/A	N/A

This inspection cycle will be reviewed as part of the annual compliance review criteria shown in **Appendix 2**, and maybe subject to revision based upon the findings of re-inspections undertaken.

For domestic area surveys, commencement of the re-inspection cycle may be deferred until completion of the initial 100% survey programme (not withstanding 'no' or 'refused' access cases).

The frequency of re-inspection shall be increased to that deemed as appropriate when a material shows deterioration subsequent to the previous inspection record and could also have moved up to the next Risk Code. Should the aforementioned process be seen repeatedly for a given material, then that material may be considered for removal prior to reaching Risk Code A.

Re-inspections shall only be conducted by personnel deemed competent to do so by the Duty Holders, usually the AAC.

6.0 DISTRIBUTING INFORMATION.

The following shall be employed to ensure that all necessary parties receive adequate information as to the presence of identified or presumed ACMs to each property.

1. Existing lines of communication shall be followed (as per organisation chart **Appendix 1**)

2. All relevant parties within Luton Council BTS (Client and Trading) and external contractors shall have knowledge and ability, to access the Asbestos Survey Database for Luton Council properties and retrieve relevant information. Internal Luton Council staff will access via the Capita system, external contractors via the ALPHATRACKER system, hosted by the AAC

3. It is intended that web access will ultimately be transferred to the Luton Council Total Mobile system asbestos module when development of a portal facility is completed. At present there is no specific timescale for this.

4. Approved external contractors, upon request and relevant internal BTS works Managers, supervisors, officers (and operatives where possible) shall be given their own specific 'log-in' identification code so that a record of their access activity can be monitored for compliance with Luton Council requirements, policy and procedures.

5. All Luton Council works/project Progress Contract meetings (especially Pre-start Meetings) must have an 'asbestos' agenda item, and project management staff must consult the Asbestos Survey Database in relation to the areas of work anticipated / scheduled. This should cover all aspects, but specifically detail.
    1. Availability and use of asbestos register information before commencement,
    2. Any identified requirements for surveys/sampling (including any delays),
    3. Provision of documentation and,
    4. Updating/provision of updated information upon completion.

6. No planned works should be allowed to go ahead without an R & D Survey. Access to the Asbestos Survey Database shall be provided to the contractor, or internal works operatives (BTS Trading), or access to the survey data made available, or by issue of a framework order / works contract / works instruction. The Principal Designer (CDM Regs 2015) (if appointed) or Housing Asset Manager shall check specifically that this requirement has been met.

7 Contractors and Luton Council staff shall take due note of any asbestos information supplied or obtained and incorporated into any relevant Risk Assessments/Plans of Work.

8 Any actions, removals or condition updates MUST be recorded / updated in the Luton Council / BTS asbestos register in a timely manner, in-line with KPI Target or HRBs golden thread where relevant.

9 The individual Duty Holder's relevant, appointed Responsible Person shall ensure updating of the asbestos register by the AAC takes place after completion of any asbestos removal or encapsulation works.

10 Information updates to the Asbestos Survey Database, e.g. inclusion of waste consignment notes / air clearance certification, shall be carried out by the AAC following asbestos removal or treatment works. Where the AAC is not instructed (i.e., for non-notifiable non-licensed work) this shall be carried out by the appropriate Responsible Person.

11 Housing Officers, Allocations Officers, Project Managers, Housing and Property staff shall be responsible for informing residents of the summary of ACMs that have been identified to the property, including the relevant risk posed by each of those materials, in accordance with the Luton Council 'asbestos communications strategy' (and associated standard letter

templates). A record shall be retained of the date and content of any tenant communications including: 'sign-up' pack, summary asbestos information, etc. Information will be re-issued following any subsequent change to any ACMs identified

7.0 IDENTIFICATION OF ASBESTOS-CONTAINING MATERIALS ON SITE.

Site survey measures shall include the provision of the assessment/survey report, including an annotated plan which will show the location of any samples taken within a property. This is in recognition of the practical problems associated with maintaining and updating plans stored upon the register which show the extent and locations of ACMs identified.

Maintenance staff, internal works operatives and contractors shall positively identify from the register all ACMs to the works area and along the access route to ensure that works can be satisfactorily conducted without disturbing any ACMs.

In addition, all BTS internal works operatives, and contractors shall have received adequate Asbestos Awareness and Non-Licensed Works Training within the last 12 months. They shall also be made aware that work orders shall carry a caveat that 'should materials suspected of containing asbestos, by virtue of their age and use, be found in the course of works which are not stated in the register, then those works shall be halted, and the relevant Responsible Person contacted'.

All external contractors appointed by Luton Council or BTS (Sub-contractors) to undertake works upon Luton Council property are further required to complete and return the "Asbestos Contractor Notice" a copy of which can be found in **Appendix 7**. This highlights the risks associated with potential asbestos material within Luton Council dwellings and requires confirmation by individual contractors employed that they are aware of their responsibilities, have and apply appropriate risk management protocols and provide suitable awareness training to all site operatives. These "Asbestos Contractor Notices" will be required as part of individual packages of work allocated and renewed annually with contractors awarded on-going Luton Council work contracts.

The legal default under CAR 2012 is where there is doubt if a material is an ACM or not, it should be presumed to be so until proven otherwise,

All properties shall fall within the overall 'Safe System of Work' operated for the site by BTS. See section 8.1 below for details.

In addition areas that are not accessible to the public will have identified ACMs labelled with a proprietary '**a**' warning label as given in **Appendix 8** to ensure positive recognition. These will be checked annually and re-applied as necessary during survey re-inspections. Areas that are accessible to the public and are within domestic properties shall not be labelled to prevent causing undue concern, or overreliance as a management control.

8.0 CONTROL OF CONTRACTOR STAFF.

Luton Council maintains a list of Approved Contractors for specific works on their premises. Parts of Luton Council also employ direct internal works operatives (BTS Trading). Those on the approved list are required to illustrate/demonstrate: a suitable level of control, that they have had asbestos awareness training within the last 12 months, that they know the requirement to access information on ACMs to properties, and where necessary request information on ACMs from the relevant Responsible Person.

The contractor and internal works operatives (BTS Trading) shall also be prepared to halt any works that may have uncovered ACMs not identified during a survey or stated as part of the list of

presumptive materials, and report these to the appropriate Responsible Person prior to proceeding further. Additionally, the contractor must have a complete understanding of their legal duties with regard to not disturbing and, where appropriate, working with asbestos. Luton Council BTS will contact all contractors employed and request/log confirmation of their understanding and application of their associated obligations (and training) annually. Where not forthcoming, no further work will be issued to these contractors.

8.1 Safe System of Work.

Luton Council operates and maintains a 'Safe System of Work' in respect to all ACMs identified on their premises. This is monitored and reviewed by representatives of the Asbestos Steering Group (ASG) and as part of the annual compliance criteria shown in **Appendix 2.**

This shall be supported by appropriate training of staff at all levels, including internal works operatives and the employment of only contractors held on the list of Approved Contractors. This shall ensure that ACMs can be readily identified and not disturbed unless by design and thus the correct process employed.

In addition, the following process shall be followed:

8.1.1 An instruction will be included in all specifications for building and maintenance work requiring contractors to consult the Asbestos Register for the presence of asbestos, together with a warning that not all asbestos may have been identified to that property.

8.1.2 All Works Orders raised from the Capita housing management system shall include a 'flag', warning the contractor to check the database system for the asbestos register for that property prior to commencing any works there.

8.1.3 If on inspection, prior to the carrying out of any maintenance or asbestos removal work, any ACM is found to have been damaged or has deteriorated it will be re-assessed and re-classified via a new `Risk Assessment` and an amended `Plan of Work` where appropriate. This will be the responsibility of the relevant Responsible Person, Project Manager, AAC and LARC to work in partnership and will supersede all previous documents.

8.1.4 Where the risk assessment and or the test results of the suspect material confirms asbestos is present and the outcome concludes there is a high risk, then management should consider, where appropriate, arrangements to vacate the area during any work with asbestos to ensure the Health & Safety of all employees, occupants and visitors to the premises have been fully considered.

8.1.5 In the case of emergency works required prior to the completion of the survey, the contractor shall be given a summary of ACMs that may be present to that building based upon age and ACMs identified to properties of a similar type.

8.1.6 The contractor will also be instructed that this list of ACMs is based upon presumption, pending a full survey and that therefore other ACMs may be present within the building. Hence, they are required to assume that any materials found which could contain asbestos (by age and use) must be presumed to be asbestos, until proven otherwise by sampling and bulk identification. The contractor will have an asbestos awareness trained operative or supervisor in this instance.

8.1.7 Those contractors or internal works operatives (BTS Trading) carrying out the works shall also have direct contact to the relevant Responsible Person on a 24-hour basis whilst the works are in progress. The AAC provides an advice and attendance service and the LARC

undertakes emergency removal and remedial works, both on a 24-hours per day, 365 days per year basis. Access to the web portal (ALPHATRACKER) remotely hosted asbestos register information is also available on a 24-hour basis (via the AAC) for direct review by internal works operatives and/or foremen (BTS Trading), or external contractors.

8.1.8 The above procedures combined with the fact that the contractor and internal works operatives shall already have received Asbestos Awareness Non-Licensed Training, shall ensure that any emergency works can be completed safely.

8.1.9 Relevant contact details for members of the Luton Council organisation will be provided to all contractors undertaking work on site, so that any suspect ACMs discovered during any works can be reported to the appropriate Responsible Persons (**Appendix 9**).

8.2 Labelling of ACMs in Non-Public Areas.

In addition to implementing the above 'Safe System of Work' Luton Council will also conduct labelling of those ACMs which have been identified to the common areas of buildings that are not accessible to the public. This is to avoid causing undue alarm to residents of flats with common / communal areas but will add to the management procedures employed for these ACMs.

8.2.1 ACMs within such areas as risers, plant rooms, lift motor rooms, electrical meter cupboards and loft spaces to blocks of flats when identified will be labelled with standard the asbestos 'a' warning label given in **Appendix 8.**

8.2.2 The label, or labels, will be applied in a conspicuous position to ensure maximum effect in warning those present.

8.2.3 During the re-inspection of these materials the condition and position of the warning label will also be checked to ensure that it is serving its designated purpose.

8.2.4 If ACMs in these locations are to be encapsulated as part of the recommended management actions, then the contractor carrying out these works shall be required to apply sufficient 'a' warning labels upon completion of the encapsulation process to ensure that the material can be readily identified in the future.

9.0 TRAINING.

The requirements for training shall be assessed by persons nominated by the Duty Holder's team and /or were requested by their staff. The training requirement is also jointly reviewed together with the AAC and will be reviewed to ensure it remains 'fit for purpose' annually as part of the compliance review process (**Appendix 2**).

The Duty Holder's team and the relevant Responsible Persons shall have sufficient knowledge and training to allow the full and effective implementation of this Plan. Any such training, as well as any Asbestos Awareness Training given to internal works operatives (BTS Trading) and staff (as per the 'Policy, Guidance and Procedures' document) shall be fully documented to include type of training received, date(s) of training, course organisers and content, and attendees.

Suggested levels of training are:

UKATA Approved Asbestos Awareness and refresher (Including E-learning)

- Site Personnel, Call Centre, Maintenance and Housing Staff (including some scheme managers): overview of how Luton Council manage ACMs in their properties and basic

UKATA approved asbestos awareness training and e-learning. Periodic refresher training thereafter at agreed frequency (likely every second year with UKATA approved e-learning 'refresher' sessions).

Non-Licenced Asbestos Training

BTS Trading - including Site Operatives, Maintenance Staff and Supervisors or Managers: Asbestos Awareness Non-Licensed training every second year and refresher training sessions between. This to include specific interpretation and 'hands on' practical training regarding any individual 'non-licensed tasks' BTS Trading are approved to undertake. Toolbox talks and refresher training on-going,
Note: this training provision is to align with BTS Trading's own individual prevailing Health & Safety Policies.

Duty to Manage Training

- Duty Holders: Asbestos Awareness and Asbestos Management Plan implementation training, i.e. Duty to Manage Training every two years and refresher training sessions in between.

- Responsible Persons: Responsible Persons are to have Duty to Manage training as Duty holders however this may be extended to additional British Occupational Hygiene Society (BOHS) P405 – Managing asbestos in buildings, or equivalent (see "Advanced Knowledge" within **Appendix 11**).

- Approved external contractors: awareness training compliant with Regulation 10 of CAR 2012. This is not intended to be provided by Luton Council BTS, but its provision audited.

- Those carrying out the re-inspection of ACMs where there is suspected to have been a change in their condition – British Occupation Hygiene Society (BOHS) P402 or P405 and relevant experience (in accordance with HSG264). In practice, this will be conducted by the AAC

- **Appendix 11** contains a copy of the training matrix developed for Luton Council identifying the level and frequency of training to be provided for relevant staff within Luton Council and 'BTS Trading'.

10.0 ARRANGEMENTS TO DEAL WITH INCIDENTS AND EMERGENCIES.

In general asbestos-containing materials should not be disturbed as long as this Plan is followed and the appropriate survey consulted prior to commencement of any works on site, and/or prior to contractors tendering for works to be carried out on site.

In addition refer to the Procedural Flowcharts at **Appendix 5** of this Plan of how to avoid disturbing ACMs and what to do if suspect ACMs are discovered, but not damaged, during works.

However, should there be an incident or emergency arising from exposure to asbestos fibres then the relevant Responsible Person for that property shall be notified immediately. He shall give suitable advice relative to the incident. This advice shall be as per Appendix 5.10

- Evacuate the room or location closing doors and shutting off mechanical ventilation and inform the foreman, relevant Responsible Person and the AAC.

- The local area must be closed off to all persons.

- The relevant Responsible Person and AAC must consult the asbestos register and sample testing records to determine if the product contains asbestos and if so, what type and quantity of asbestos is likely to be present.

- The AAC will provide advice and attend if necessary to carry out any required testing – whether it be the testing of materials or of the air to determine contamination levels. This will assist in determining what, if any, emergency work needs to be completed and whether the approved LARC needs to be employed to undertake the clean-up prior to any re-occupation and normal work proceeding.

Emergency arrangements procedures are to include a full investigation of incidents to establish root cause, effect to aid prevention of further occurrences. Any such occurrences, and their outcomes, shall be reported to the Asbestos Steering Group for review. This forms part of the annual compliance review criteria, as shown in **Appendix 2.**

A list of persons to be contacted in the case of an emergency relating to the damage or disturbance of ACMs is given in **Appendix 9**. HSE Equipment & Method Sheet for personal decontamination is given at **Appendix 6**.

11.0 ESTABLISHING A PROGRAMME FOR REMOVAL/TREATMENT.

The policy for the programme of removal will involve a prioritisation process based upon the evaluation of the risks presented by the ACM, the order of planned projects and any recommendations given in the asbestos survey report.

Overall, the strategy for developing a programme for removal/treatment shall take into consideration the following factors:

i. Known high risk items (priority materials) will be co-ordinated through the relevant Responsible Person, AAC, or other competent organisations/consultants employed by the Duty Holder specifically to control these works,

ii. Details from planned projects, refurbishment or otherwise, and any site work shall be assessed for the likelihood of their interference with asbestos containing materials,

iii. Details from assessment (survey) results that were specifically undertaken to facilitate refurbishment,

iv. Any interim changes which may arise from unplanned work or accidental/deliberate damage in any of the buildings – 'emergency work',

v. Where the ACM has or is likely to deteriorate due to change in use and/or occupancy of the area,

vi. Where monitoring and/or staff observations regarding changes to the condition of ACMs require a review,

vii. Where the ACM is likely to deteriorate due to planned maintenance activities,

viii. Known ACMs shall be monitored and may not be removed or treated for the foreseeable future while their condition is good and they are not likely to be interfered with, and

ix. Known ACMs which have exposed surfaces and require encapsulation, according to assessment recommendations, and are not areas accessible to the public may remain untreated for longer periods of time where the ACM does not present an immediate risk. In addition, all persons who are liable to interfere with the ACM are instructed appropriately.

Where the project exposes or reveals items suspected to contain asbestos these will be assessed and treated as a matter of urgency. The Responsible Person co-ordinating the project shall if

required have access to appropriate independent advice from the AAC, to aid in their assessment of risk and programming of work.

11.1 Risk Assessments for Works on Asbestos-Containing Materials.

Any contractor (licensed or otherwise) undertaking work relating to an ACM on any site, shall carry out a risk assessment with which to produce a 'Plan of Works' relating to those works, for submission to the AAC acting for Luton Council, for approval prior to undertaking work on any ACMs. A copy of this Plan of Works must be passed onto the AAC or Luton Council.

In the case of *licensed* work on ACMs for which the Risk Assessment shows they must be notified to the Health & Safety Executive, then notification must be undertaken at least 14 days prior to the commencement of the works using form FOD ASB5 in accordance with the requirements of their license. This form to be copied to the Responsible Person at Luton Council for their records in each case.

In the case of *non-licensed* work for which the Risk Assessment shows they must be notified to the Health & Safety Executive, then notification must be undertaken at least immediately before the commencement of the works using the on-line form ASB1 (NNLW) in accordance with the requirements of CAR 2012. This form is again to be copied to the Responsible Person at Luton Council (by the contractor) for their records in each case.

In case of non-licenced works work does not need to be notified to HSE.

The content of these risk assessments, which must be in writing, shall include, but may not be limited to;

- Defining the work to be undertaken (e.g. removal, repair, or encapsulation),
- Identifying the type of asbestos or assume that it is not Chrysotile (white asbestos) alone,
- Defining the quantity, extent and condition, of ACMs and how it is attached to substrate,
- Determining the nature and degree of exposure which may occur in the course of the work,
- Considering the effect of control measures taken to stop release of fibres into the surrounding environment,
- Considering the results of monitoring of exposure, or justification for not monitoring i.e. an alternative method of evaluation,
- Detailing steps to be taken to prevent or reduce exposure to the lowest level reasonably practicable,
- Considering the results of medical surveillance; applicable for persons likely to exceed the Control Limit,
- The procedures for the bagging, handling and removal of asbestos waste,
- The selection, provision and use of RPE and PPE,
- Emergency procedures,
- The details for the cleanliness of the area after removal (e.g. clearance / reassurance testing),
- Non asbestos risks (e.g. working at height, chemical, biological, plant, confined spaces, noise, lone working), and
- Upon completion of all work instructed to the AAC, the AAC shall collate relevant information and update the asbestos database in a timely manner.

11.2 Plan of Work/Method Statement for Work on Asbestos-Containing Materials.

The completed Risk Assessment shall be used by the Contractor, or any party working on ACMs, to draw-up a job specific Plan of Work (Method Statement). This should be made available to the site manager, Luton Council or their AAC upon request.

The Plan of Work/Method Statement shall address as a minimum the following issues, may be required to be submitted to the local enforcing authority, and shall be retained on site by the contractor for the duration of the works:

- General Information - property name, address including postcode, date works to commence and expected duration, tenant/s' name/s (if remaining in occupation during works),
- Identification of the nature of material, asbestos type/content and condition.
- Nature of the work to be undertaken.
- Outcome of the Risk Assessment for the works.
- Exact measures to be employed to prevent or reduce the exposure of those working on ACMs and nearby during removal/repair.
- Measures to be employed to prevent the spread of asbestos fibres during the removal/repair of asbestos.
- Details of protective equipment to be employed by operatives (for example, protective coveralls should be Type 5/6 and RPE must have P3 filter and be either half-mask for Low-Risk materials or full-face power assisted for use inside enclosures).
- Measures to allow operatives to enter and leave the works area without spreading asbestos fibres.
- Measures procedures for the safe storage, handling and disposal of asbestos waste.
- Measures for the full and proper decontamination of operatives.
- Procedures, standards required and any testing to be conducted to ensure that the works area is left in a clean and fit condition for re-occupation/use by others. This shall specifically address the requirement for all enclosures to undergo the four-stage clearance procedure by an independent, UKAS accredited consultant), prior to removal.
- Any other information considered relevant, such as for example, details of independent analyst, unexpected events, visits by Enforcement Agency, photographs, incidents/accidents/near misses, other documentation, etc.

For the limited number of non-licensed asbestos related tasks/operations for which BTS operatives are approved and trained; risk assessments and method statements will be tailored to identify any additional/extraordinary risks identified, a Plan of Work developed and fully implemented on site in every case. Before commencement, the operative/foreman/supervisor will assess whether this is a task for which the modified generic method is appropriate. Where it is not, the Responsible Person will assess the need to instruct the AAC to undertake a site-specific assessment and ensure work is specified and commissioned appropriately.

12.0 RELEVANT LEGISLATION, APPROVED CODES of PRACTICE (ACoPs) AND HSE GUIDANCE NOTES.

The implementation of this Plan and the management of identified ACMs must be conducted, at a minimum, in accordance with the following legislation, Approved Code of Practices (ACoPs) and HSE guidance notes:

12.1 Relevant Legislation.

12.1.1 Health and Safety Work Act 1974.

12.1.2 Workplace (Health Safety and Welfare) Regulations 1992.

12.1.3 The Management of Health and Safety at Work Regulations 1999.
12.1.4 Control of Asbestos Regulations 2012 (CAR).
12.1.5 Construction, Design and Management Regulations 2015.
12.1.6 Hazardous Waste Regulations 2005 (as amended 2009).
12.1.7 The Waste (England and Wales) Regulations 2011.
12.1.8 The Environmental Protection Act 1990.

12.2 Approved Codes of Practice (ACoP).

12.2.1 L127 Approved Code of Practice –'Managing asbestos on non-domestic buildings'.
12.2.2 L143 Approved Code of Practice – 'Work with materials containing asbestos'.

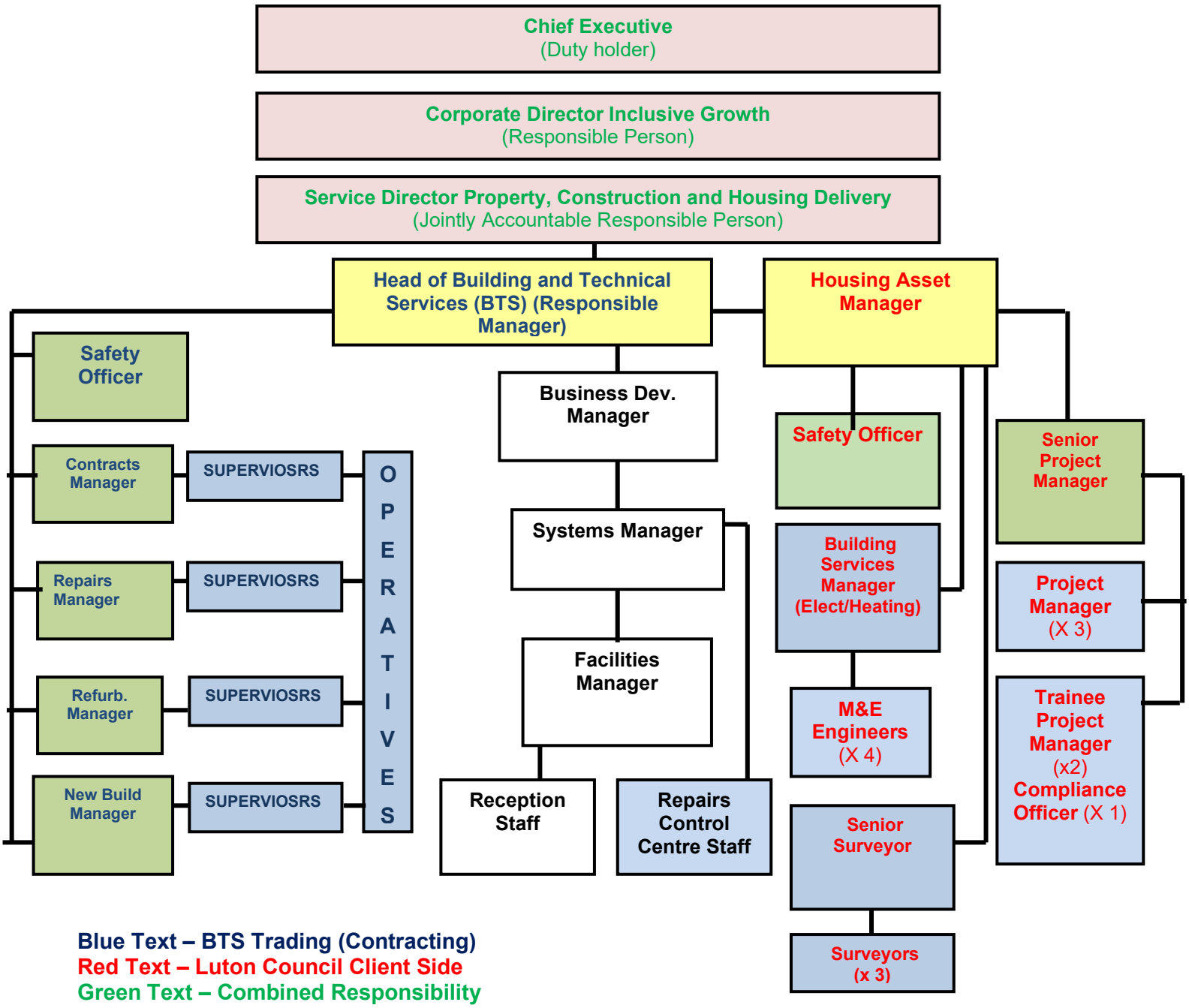
12.3 HSE Guidance Notes.

12.3.1 HSG227 – 'Comprehensive guide to managing asbestos in non-domestic buildings.
12.3.2 HSG247 – 'Asbestos: The licensed contractors' guide'
12.3.3 HSG248 – 'Asbestos: The analysts' guide for sampling, analysis and clearance procedures.
12.3.4 HSG264 – 'Asbestos: The survey guide'.
12.3.5 HSG 210 - 'Asbestos Essentials'.

APPENDICES

Appendix 1 -

1 Management Structure of Luton Council and BTS Showing Client/Contractor Delineation for Asbestos Management and Client: Contractor/Combined Roles



Blue Text – BTS Trading (Contracting)
Red Text – Luton Council Client Side
Green Text – Combined Responsibility

Key

Jointly Accountable Responsible Person shown in pink boxes
Responsible Managers And Jointly Accountable RM in yellow boxes
Responsible Operators in Green boxes
Persons with further devolved duties in blue boxes
Persons with no designated or direct Asbestos Management responsibilities in white boxes
Refer to Section 2.0 for Duty holder and Responsible Person information

Appendix 2 - Compliance Documentation Review Criteria

i) Annual Compliance Review Criteria

The Review will be carried out by the Luton Council Client appointed group chaired by the Housing Asset Team Health & Safety Officer as part of the asbestos compliance regime on an annual basis, or more frequently when any of the triggers identified in part ii) below applies. The Review will consider:

1. **Survey programme**. Proportion of Council stock surveyed (comprehensive / whole house Management Surveys – sampling survey) for all relevant tenures / configurations:
    a. Communal Areas associated with Domestic property (including leased stock);
    b. Domestic Property.
    c. Shops, and
    d. Garages and associated communal areas.

2. **Remedial Work**. Whether all remedial works recommended under the surveys and/or monitoring re-inspections been carried out within the required timescales?

3. **Monitoring**. Have identified ACMs been monitored? Proportion of Re-Inspections completed within timescale (timescales determined against the agreed Luton Council risk protocol criteria).
    a. Evaluate findings / trends arising from the re-inspection survey results and
    b. review adequacy of the re-inspection protocol and re-inspection cycles accordingly.

4. **Training** and awareness; have all staff received appropriate training in compliance with the Luton Council BTS asbestos training matrix and repeat cycles? Include consideration of:
    a. New starters during the preceding 12 months as part of induction programmes.
    b. Approved external contractors employed (confirmation / auditing of partner contractors + sub-contractors training /awareness provision).

5. **Register**. Has the Asbestos Register / database been comprehensively updated after survey, re-inspection, ACM remedial or removal works? Include all work streams and any managed by BTS Contracting/external agency/consultants along with waste consignment notes, clearance/reoccupation certificates, etc.

6. **Lessons learned** from incidents. Asbestos related ‘near misses’, dangerous occurrences, or reportable instances. Have all such occurrences been fully investigated during the preceding 12 months, lessons learned and appropriates corrective actions recorded/implemented? Review any instances of failure of procedures put in place (internal auditing);

7. Effectiveness of current **Asbestos Management Plan and Procedures**. Including consideration of:
    a. Resources. Are resources related to asbestos compliance adequate for purpose (appropriate staff, training, budgets, and I.T. systems)?
    b. Changes to organisational structure.
    c. Changes to guidance, or legislation.

d. Changes to Luton Council procedures.
e. Incidents which have occurred along with root cause/s and trend analyses.

8. **Communication**. Provision of general guidance and post survey/works information to residents. Has this been comprehensive and timely; including at commencement of new tenancies. Review any concern or feedback received.

9. Asbestos **Survey** arrangements; are arrangements for the commissioning, conducting and receipt of surveys and data satisfactory? Review performance of contract arrangements and key performance indicators/metrics (including turnaround times, compliance, and accuracy of survey data).

10. Asbestos **Removal** / Remediation arrangements; are arrangements for the commissioning of removal or encapsulation of asbestos containing materials satisfactory? Review performance of contract arrangements and key performance indicators/metrics (including turnaround times, quality/provision of documentation and resident satisfaction).

11. Response from BTS Contracting in relation to their own Policy and Plan. Following referral of the Plan to BTS Contracting for consideration in relation to their own Policy and Plan prior to the formal Review, Luton Council Client-Side shall consider whether the response from BTS Contracting is sufficient to confirm conformity between the respective documents.

The appointed Review Group will consider, record and prioritise any resultant actions determined to be necessary to deliver robust asbestos management by the 'duty holder'.

Actions will then be interpreted into discrete steps (milestones) and will be 'SMART', i.e. Specific, Measurable, Achievable, Realistic and Timely, with due consideration of; required overarching timescales, resources and the individuals/AlphaTracker charged with executing each action. Progress will be periodically reviewed by the appointed group to ensure closure of actions within the identified timescale/s.

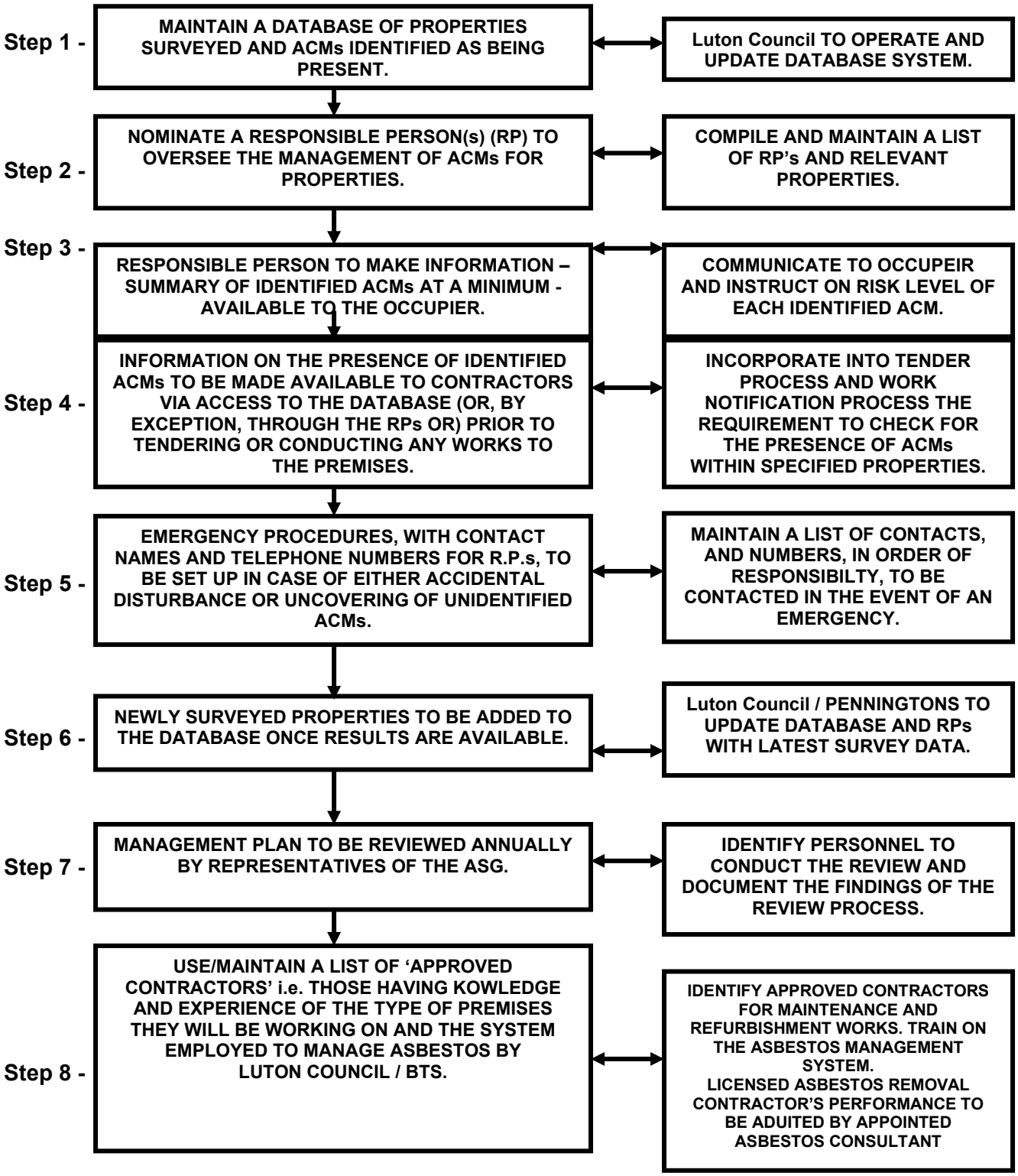
ii) Review Triggers/Timetable

A review will be carried out on a yearly basis, or more frequently where there has been a significant event such as:

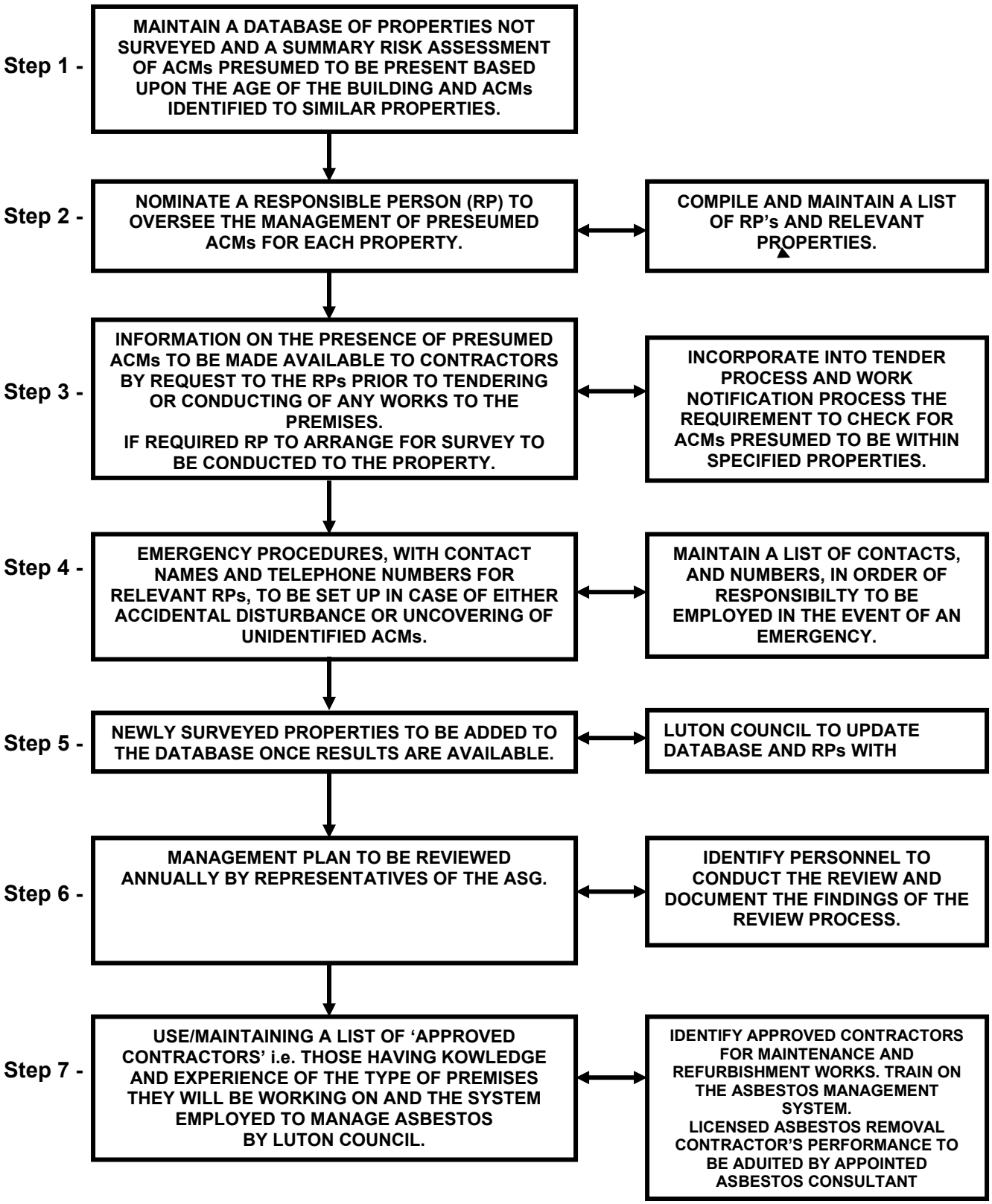
- Changes in legislation, regulations, and/or related HSE Guidance or Approved Codes of Practice.
- Following incidents, significant near misses, and/or exposure of personnel to significant airborne asbestos fibre levels.
- Significant transfer or increase of premises.
- Following a significant change in Luton Council BTS's organisational structure; or
- If arrangements within the plan are, for any reason, considered no longer to be adequate.

Appendix 2a – Diagrams for Management Strategies for Surveyed and Non-Surveyed Properties.

2.1 PREVIOUSLY SURVEYED PROPERTIES



2.2 PREVIOUSLY UNSURVEYED PROPERTIES



Appendix 3 - ACMS to be Presumed as Present within Non-Surveyed Properties.

All buildings built prior to the year 2000 have the potential to contain asbestos.

Material	Age of Building Found
Mastic pad to underside sink.	All dates pre-2000.
Floor tiles.	All dates pre-2000.
Stair nosing.	1900s.
Bitumen toilet cistern.	1900s.
Textured coatings.	All dates pre-1985.
Gasket to pipe work and boiler.	All dates pre-2000.
Cement under cloaking to edge of roof.	All dates pre-2000.
Cement soffits.	1900s.
Cement roof sheet external.	All dates pre-2000.
Cement water tanks.	1900s.
Cement flue pipe and cowls.	All dates pre-2000.
Cement panels to ceiling and fireplaces.	All dates pre-2000.
Fuses	All dates pre-2000
Electrical switch gear.	1900s.
Paper lining beneath man-made mineral fibre insulation.	1900s.
Rope to skylight.	All dates pre-2000.
Insulation board infill panels to: surrounds to fires, walls of cupboards, basement ceilings, lining panels to doors, boxing, and within dumb waiter.	All dates pre-1985.
Insulation board lining panels to doors.	All dates pre-2000.
Lagging to pipe work.	1900s.

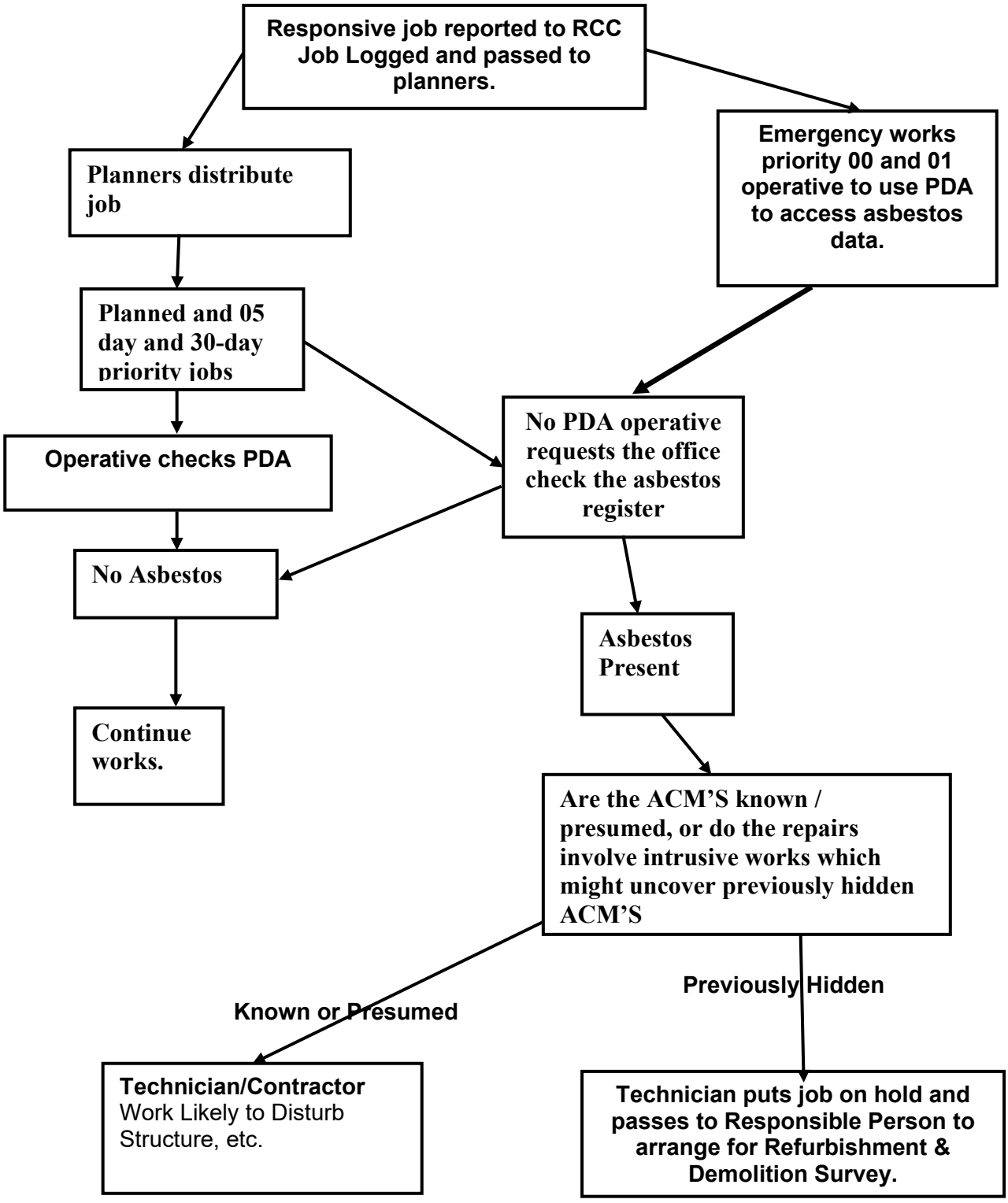
Appendix 4 - ACMS likely to be Present within Properties, Associated Risk Level, and Recommended Management Actions.

Material	Risk Level*	Management Action(s)	Responsible Party
Mastic pad to underside sink.	Very Low	Re-inspect at a frequency according to the level of risk.	Relevant R.P.
Floor tiles.	Very Low	As above.	Relevant R.P.
Stair nosing.	Very Low	As above.	Relevant R.P.
Bitumen toilet cistern.	Very Low	As above.	Relevant R.P.
Textured coatings.	Very Low	As above. Paint areas of minor damage.	Relevant R.P.
Gasket to pipework and boiler.	Very Low	Re-inspect at a frequency according to the level of risk.	Relevant R.P.
Cement under cloaking to edge of roof.	Very Low	As above.	Relevant R.P.
Cement soffits.	Very Low	As above.	Relevant R.P.
Cement water tanks.	Low	As above.	Relevant R.P.
Cement roof sheet.	Low	As above. Encapsulate areas of minor damage.	Relevant R.P.
Cement flue pipe and cowls.	Low	As above.	Relevant R.P.
Cement panels to ceiling and fireplaces.	Low	As above.	Relevant R.P.
Insulation board soffits.	Low	As above.	Relevant R.P.
Electrical switch gear.	Low	Re-inspect at a frequency according to the level of risk.	
Rope to skylight.	Medium	As above.	Relevant R.P.
Insulation board to ceilings, walls of cupboards etc. and surrounds to fires.	Medium	As above. Encapsulate areas of minor damage.	Relevant R.P.
Paper lining beneath man-made mineral fibre insulation.	Medium	Re-inspect at a frequency according to the level of risk.	Relevant R.P.
Insulation board lining panels to doors.	Medium/High	As above. Encapsulate areas of minor damage. Remove if damage is significant.	Relevant R.P.
Lagging to pipe work.	Medium/High	As above.	Relevant R.P.

* Risk Rating is based upon the type of material and also presuming it to be in a sound condition. Damage to ACMs, loss of sealant will increase the risk that they pose and thus change their Risk Rating.

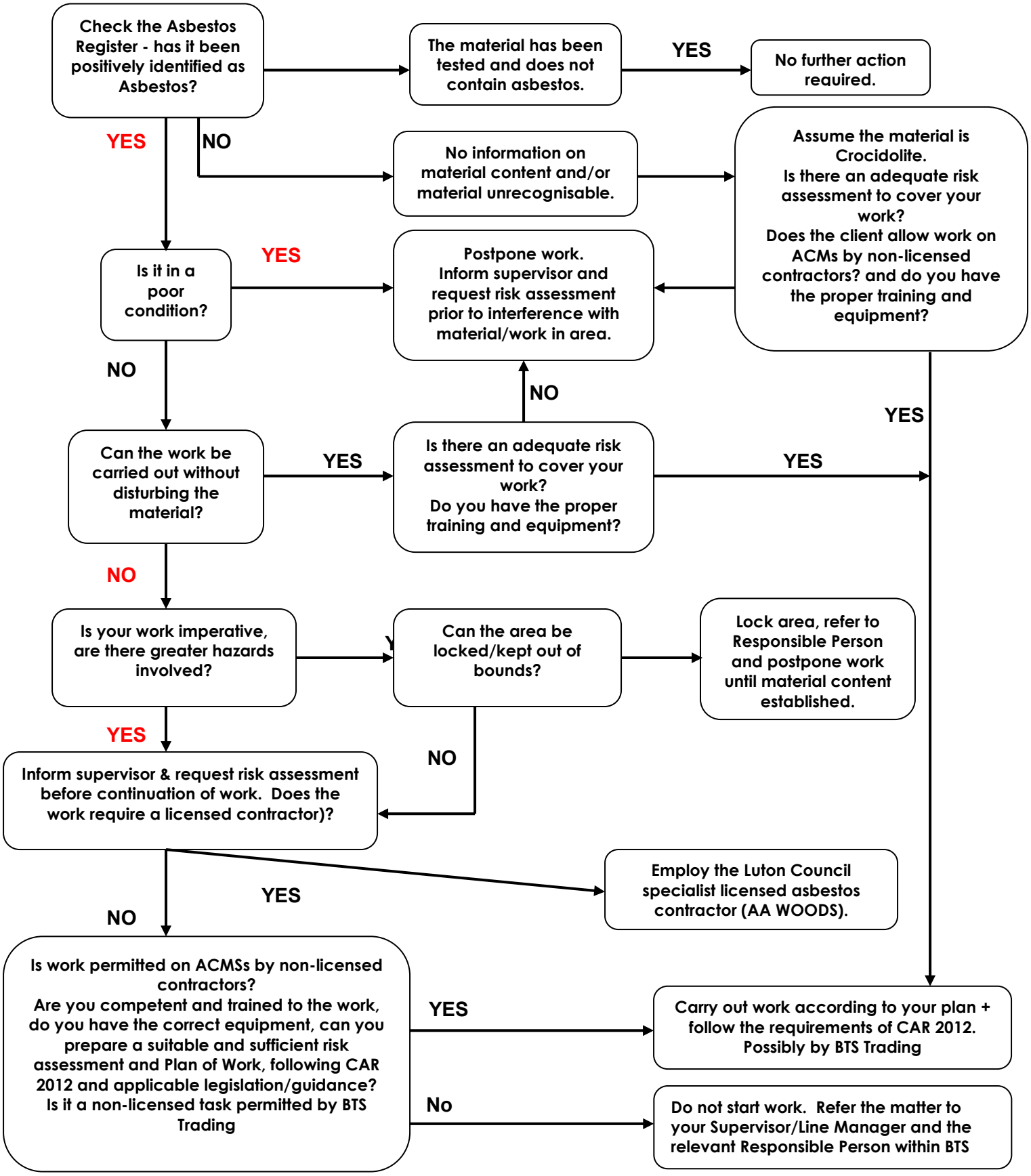
Appendix 5 - Procedural Flowcharts.

5.1 Responsive Job Issuing Process (New Process Map)

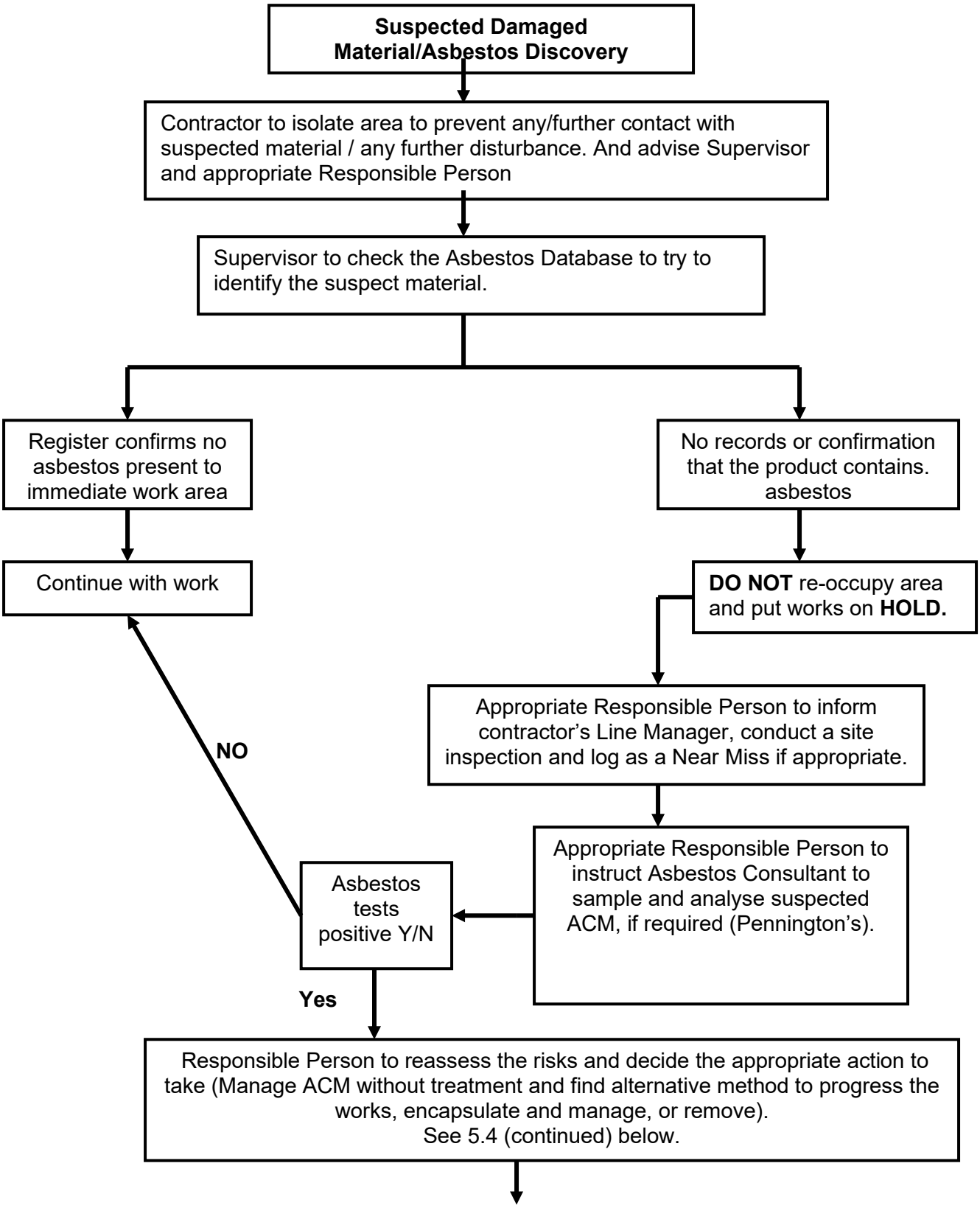


Person issuing job to ensure all paperwork provided and Register updated upon completion.

5.2. TECHNICIAN/CONTRACTOR – IS YOUR WORK LIKELY TO DISTURB THE BUILDING STRUCTURE AND/OR PLANT?



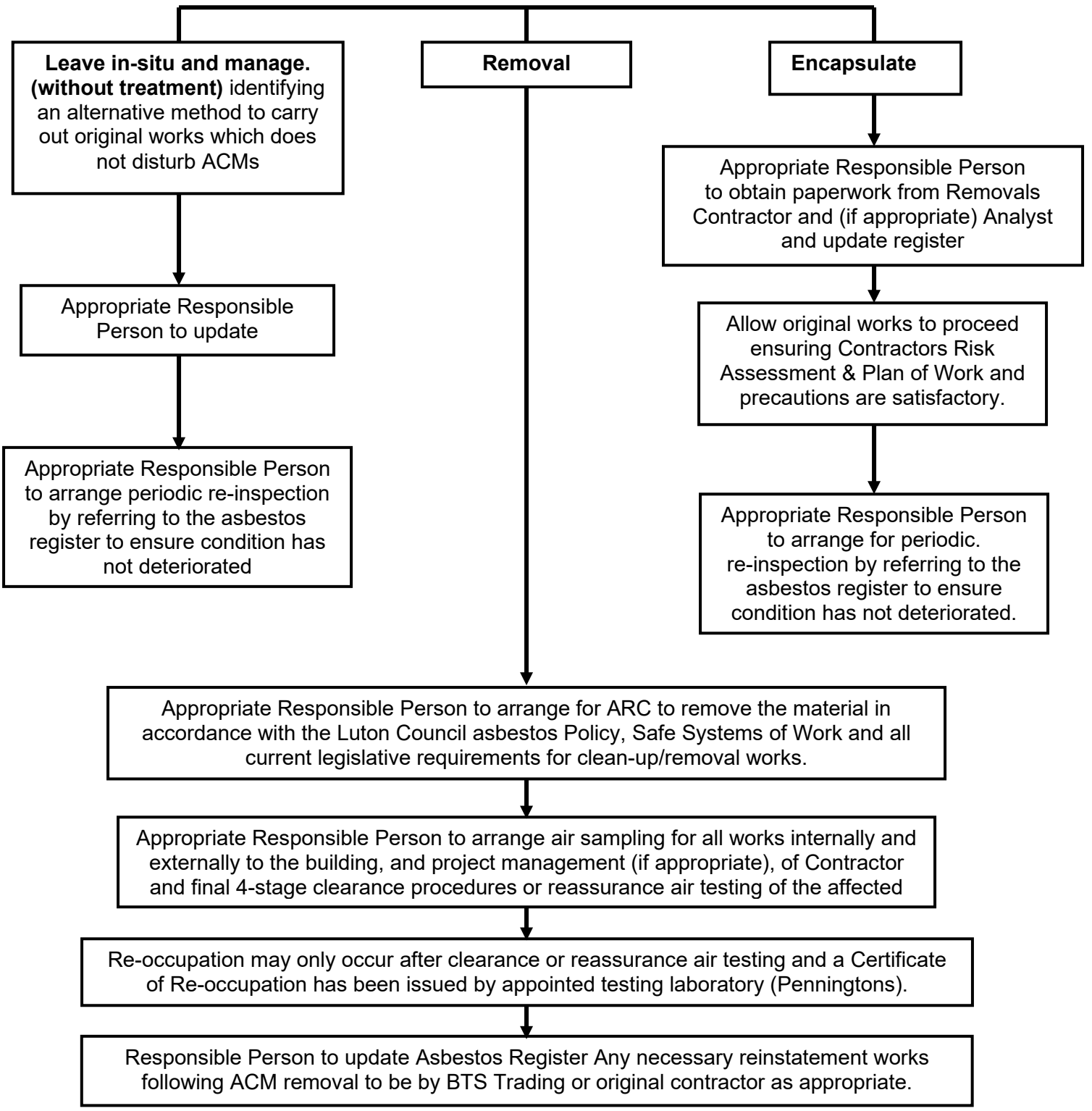
5.3 DAMAGED ASBESTOS DISCOVERY PROCEDURES FLOWCHART



Continued.

Responsible Person instructs ASC and ARC accordingly and ensures asbestos register is updated upon completion.

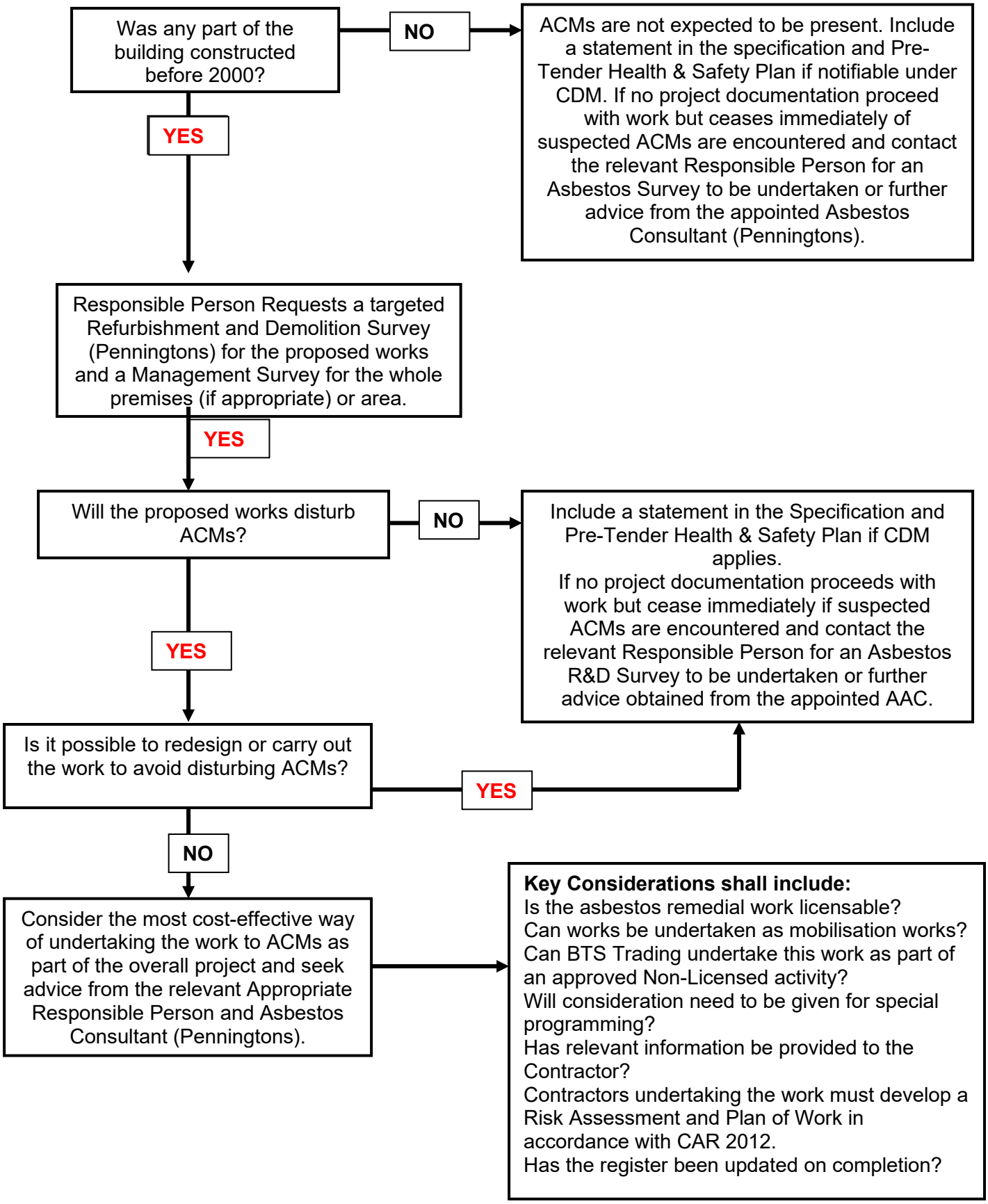
5.4 ASBESTOS DISCOVERY PROCEDURES FLOWCHART (CONT'd.)



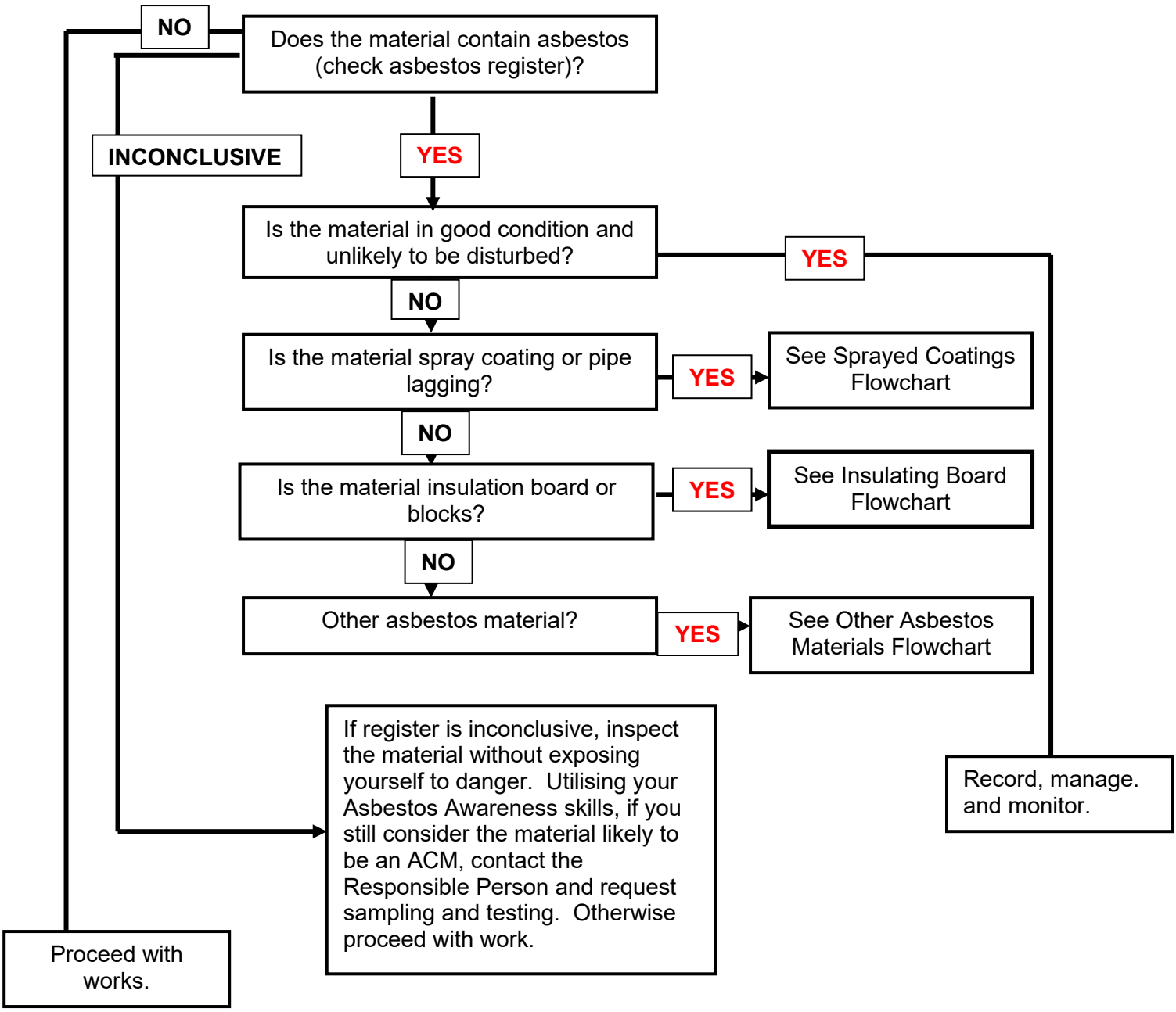
Before formal hand-over of area the Appropriate Responsible Person / Asbestos Consultant (Pennington's) must carry out a visual inspection. This must occur on a working day to allow attendance of appropriate management if required.

The Appropriate Responsible Person must ensure that asbestos register is updated.

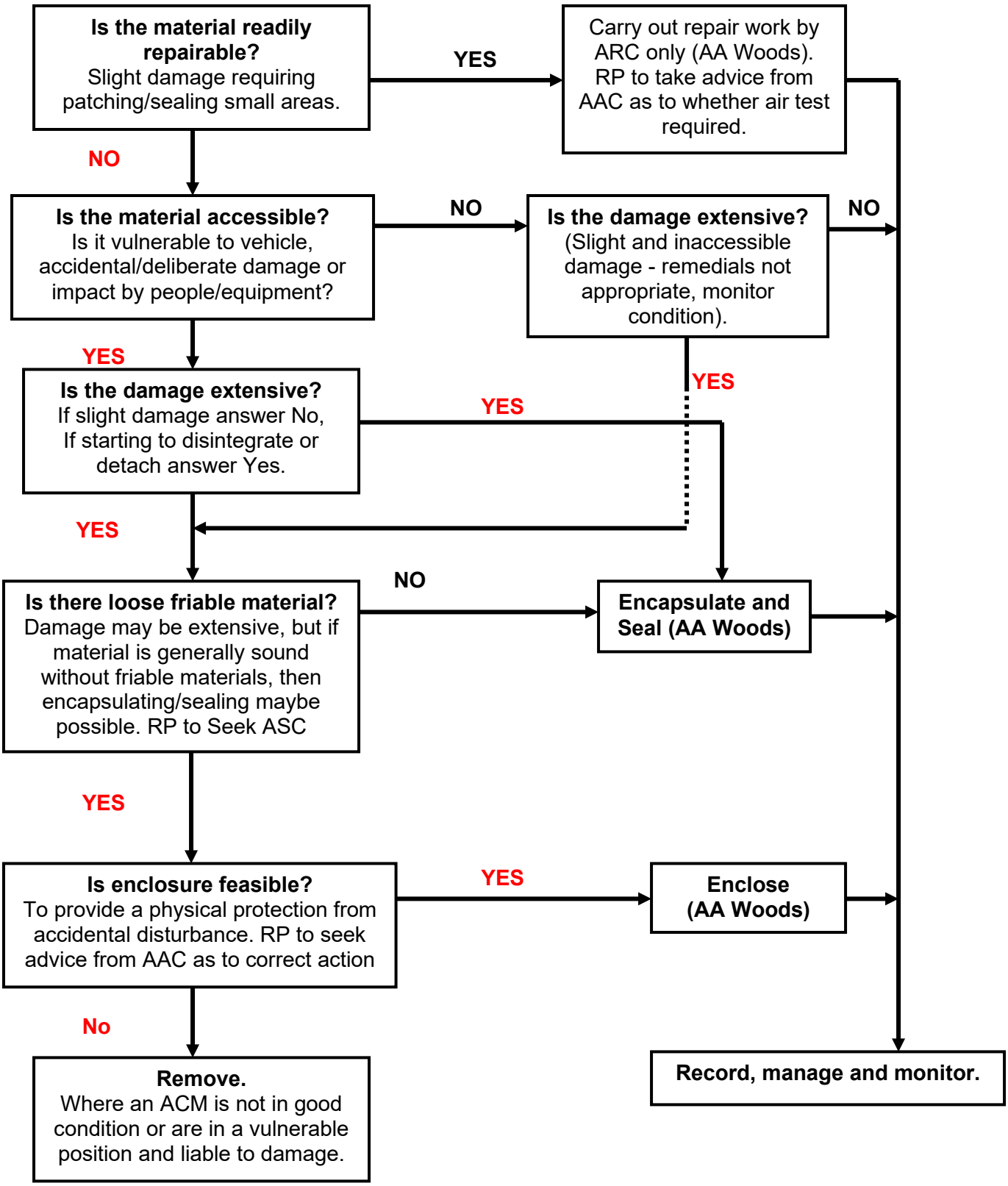
5.5 PROJECTS WHERE ACMs MAY BE DISTURBED



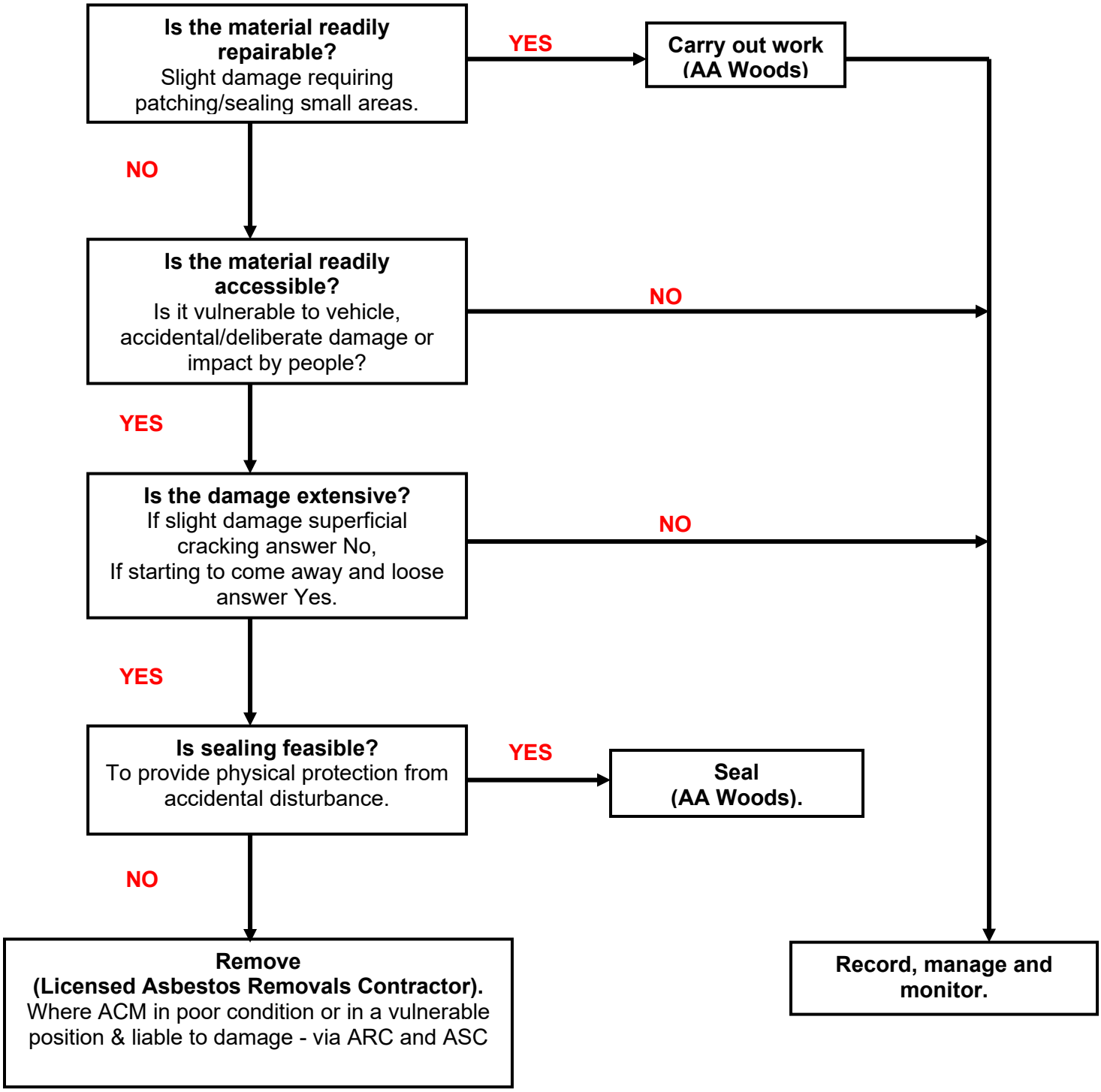
5.6 MATERIALS ENCOUNTERED WHICH ARE SUSPECTED OF CONTAINING ASBESTOS



5.7 ASBESTOS SPRAYED COATINGS AND PIPE INSULATION – LICENSED ACM

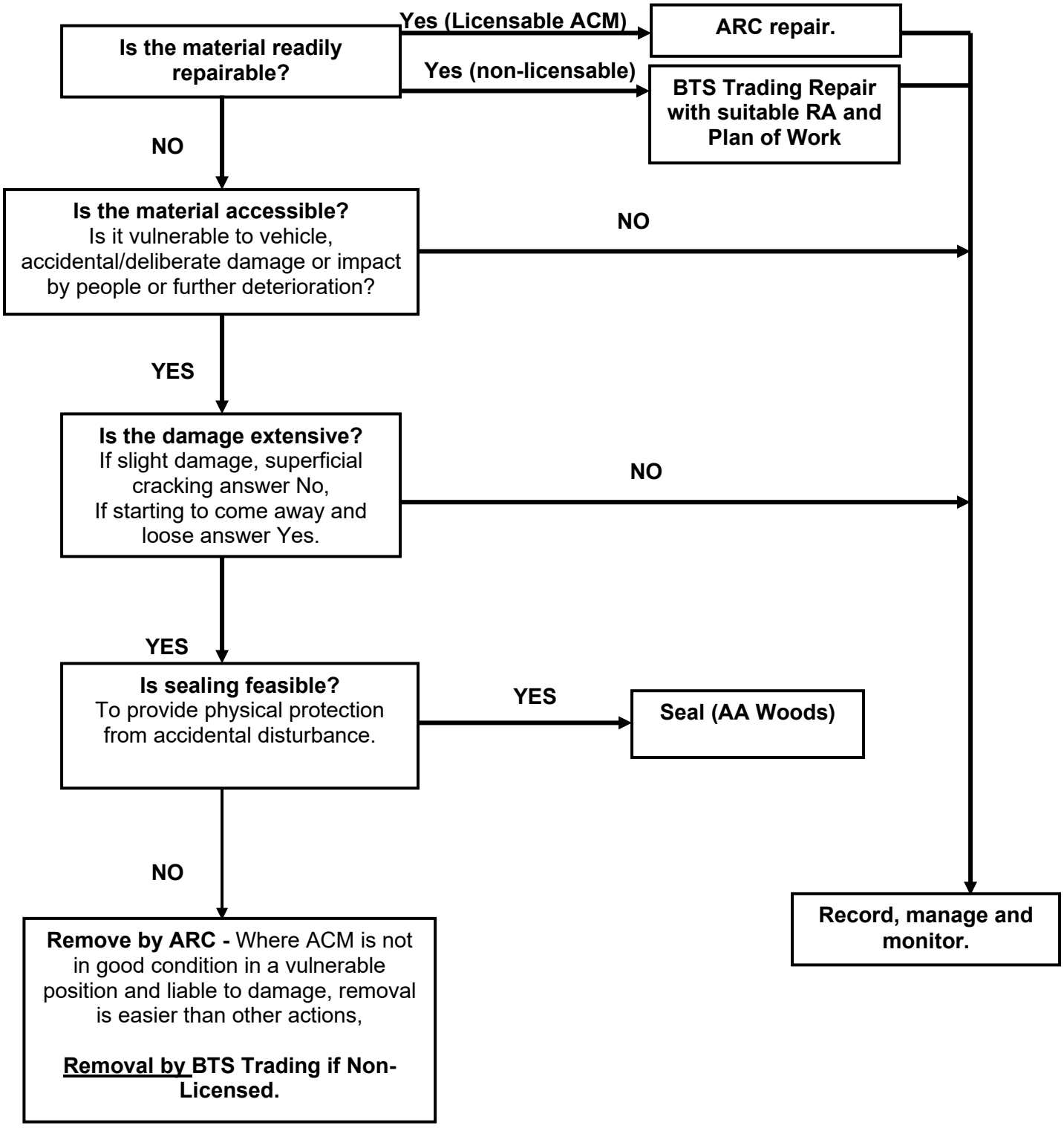


5.8 ASBESTOS INSULATING BOARD AND INUSLATING BLOCKS



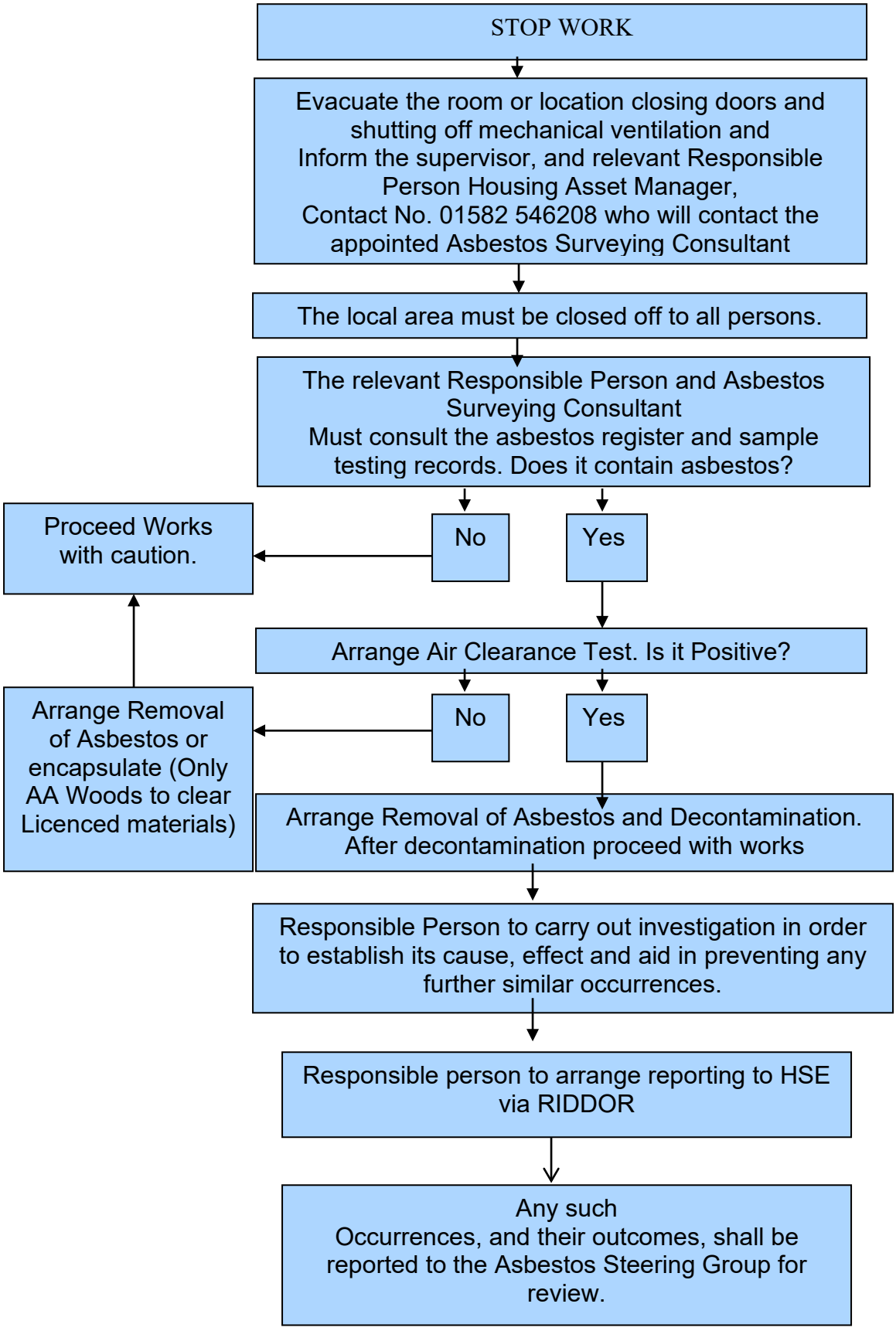
Responsible person to ensure all paperwork provided and Register updated upon completion.

5.9 OTHER ASBESTOS MATERIALS (BONDED PRODUCTS, ASBESTOS CEMENT, TEXTILES, GASKETS, ROPES, etc.)

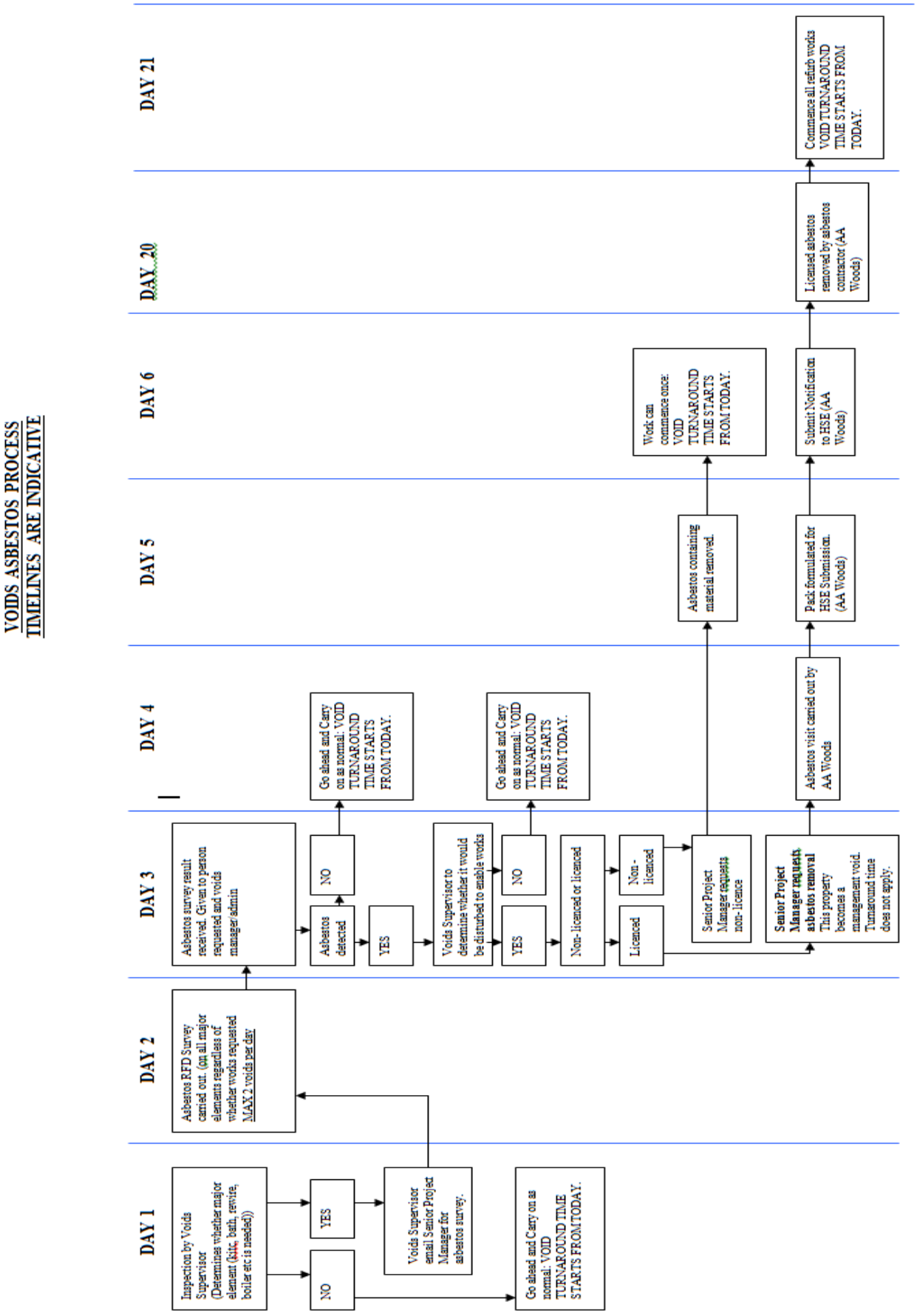


Person issuing jobs to ensure all paperwork provided and Register updated upon completion.

5.10 Accidental Disturbance of Asbestos Containing Material



5.11 Voids Asbestos Process



Appendix 6 – HSE Asbestos Essentials Guide – Personal Decontamination

(http://www.hse.gov.uk/pubns/guidance/em8.pdf)

HSE

Health and Safety Executive

em8 asbestos essentials

Non-licensed tasks

This information will help employers and the self-employed to comply with the Control of Asbestos Regulations 2012.

It is also useful for trade union and employee safety representatives.

Remember:

- **Asbestos fibres can cause lung cancer and lung diseases.**
- **You must be trained to work safely with asbestos materials.**
- **You must be trained to use PPE and RPE properly.**
- **Remove your respirator last.**

Personal decontamination

Equipment and method sheet

What this sheet covers

This sheet describes how to decontaminate yourself after any work with asbestos materials.

Personal decontamination is easier when you wear the correct personal protective equipment (PPE).

You need to decontaminate yourself properly, otherwise you may take asbestos fibres home on your clothing and expose your family and friends.

Procedures

Removing and decontaminating personal protective equipment (PPE)

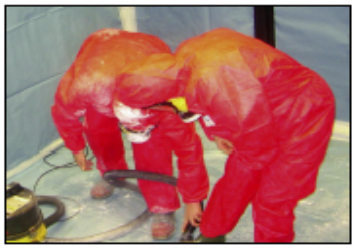
- Clean your boots with damp rags – see sheet em7.
- Where available, clean your overalls with the brush attachment on a Class H vacuum cleaner. Vacuum off the brush.
- Otherwise, use damp rags by a 'patting' action. Rubbing can disturb fibres.
- Where there are two workers, they can help to clean each other.
- Peel off disposable overalls. They should be inside out. Put them in a suitable asbestos waste container.
- Bag up re-usable overalls for a specialist laundry.
- Finally, remove your disposable respirator and place it in the asbestos
- Finally, remove your disposable respirator and place it in the asbestos waste container.
- Tape the container closed.

Personal decontamination

- Can you use site washing facilities? If so, they must be for your use only.
- Keep other people out during personal decontamination, and until you have cleaned the facilities.
- Wash every time you leave the work area.



Make sure you restrict access



'Buddy' cleaning using a Class H vacuum cleaner



1 of 2 pages

MORE HELP

- More asbestos pictures – www.hse.gov.uk/asbestos/gallery.htm
- Help to decide if work is licensed – www.hse.gov.uk/asbestos/licensing/index.htm
- For information about health and safety, or to report inconsistencies or inaccuracies in this guidance, visit www.hse.gov.uk/. You can view HSE guidance online or order priced publications from the website. HSE priced publications are also available from bookshops.
- These equipment and method (em) sheets and task (a) sheets can be downloaded free from www.hse.gov.uk/asbestos/essentials/index.htm
- See sheet a0 for details of more guidance.

- Use damp rags to clean the washing facilities at the end of the job.
- Clean the facilities daily if the job lasts more than one day.
- Inspect the facilities visually once the job is finished.
- Clearance air sampling is not normally needed for washing facilities.

This guidance is issued by the Health and Safety Executive. Following the guidance is not compulsory and you are free to take other action. But if you do follow the guidance you will normally be doing enough to comply with the law. Health and safety inspectors seek to secure compliance with the law and may refer to this guidance as illustrating good practice.

This document is available at www.hse.gov.uk/asbestos/essentials/index.htm

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Published by the Health and Safety Executive 04/12

Appendix 7 – Luton Council 'Asbestos Contractor Notice'.

LUTON BOROUGH COUNCIL

HOUSING & COMMUNITY LIVING DEPARTMENT CONTROL OF ASBESTOS REGULATIONS 2012 - ASBESTOS SAFETY RULES FOR CONTRACTORS:

This notice is to advise you that whilst working in Council owned housing premises it is the duty of Luton Council (Luton Council) and Contractors employed by them to comply with the requirements of prevailing asbestos related legislation and guidance (see reverse). This requires you to conduct your undertakings in such a way as to ensure, as far as is reasonably practicable, that all those persons likely to be affected are not exposed to Health and Safety Risks.

ASBESTOS EXPOSURE ASSOCIATED WITH LOCAL AUTHORITY HOUSING MAINTENANCE WORK:

Asbestos may be found in Council owned dwellings and could therefore be disturbed during the execution of normal maintenance work. You must therefore take all precautions, in accordance with prevailing Health and Safety Executive Guidance.
If any risk from asbestos is perceived you must cease work immediately and contact your supervisor or manager who should in turn contact, the Luton Council Programme Manager on ext. 6208 (01582 546208), or Asbestos Project Manager on ext. 6893.
All work shall be carried out in accordance with the Housing & Community Living Department Asbestos 'Management Plan' and 'Policy & Procedures', copies of which are available from the above Luton Council officers.
It is essential that if you are proposing any works or actions where you have doubt as to whether asbestos may be present or have concern that suspected asbestos material may have been damaged, then contact should be made with the above-mentioned Luton Council Housing Landlord Services Officers, who will advise regarding appropriate action required.

THE HEALTH AND SAFETY EXECUTIVE ADVISE THAT ASBESTOS IN GOOD CONDITION IS SAFE IF UNDISTURBED. HOWEVER, IF DAMAGED, DISTURBED, DRILLED, BROKEN UP, FRIABLE, OR WEARING (IE POWDERY) EXPERT ADVICE AND ACTION NEEDS TO BE TAKEN IMMEDIATELY TO AVOID RISK TO HEALTH.

Asbestos may be present in a variety of building materials the most familiar being:

- Pipe, boiler and heating equipment lagging.
- Insulation panels on doors, walls, ceilings, service ducts.
- Asbestos cement products: roofs, gutters, downpipes.
- Bath panels.
- Textured coatings (Artex or similar); and
- Floor tiles.

If in doubt, it must be assumed a material contains asbestos; cease working upon that material, take the necessary precautions as laid down above, by following appropriate HSE guidance and notify the appropriate Luton Council officer immediately.

You are hereby required to sign this notice and return a copy to the Housing Landlord Services Supervising Officer by return.

_____

I acknowledge that I have been informed that there may be asbestos in the Luton Council properties that this company may be undertaking work within and that all employees (and sub-contractors) will fully adhere to the Luton Council Asbestos 'Management Plan' and 'Policy & Procedures', together with published HSE guidance in relation to asbestos containing materials (ACMs).

Signed: _____

Print Name: _____Title/Role: _____

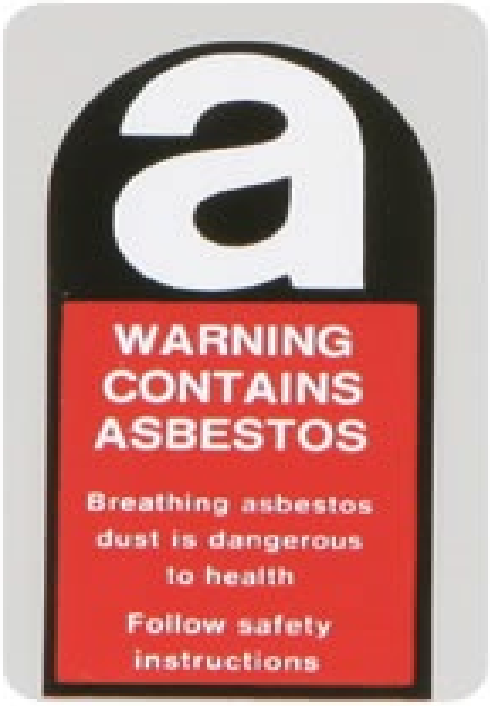
For and on behalf of (Registered Company Name):

_____

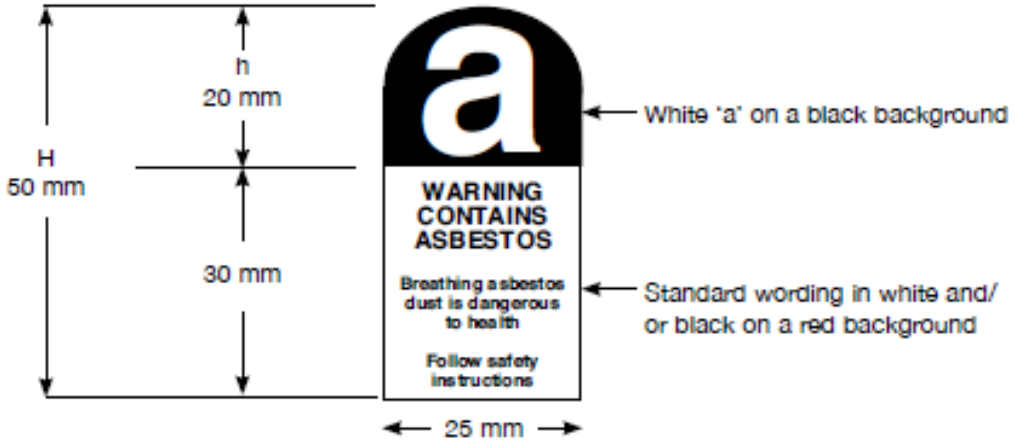
Date: _____/_____/ 20_____

Luton Council Contractor Asbestos Notice March June 2025

Appendix 8 - Standard Asbestos Warning Label.



N.B. - Not to scale. Sizing shown below



Appendix 9 - Contact Details (Responsible Persons) for Emergency Situations.

Role	*Contact*	*Telephone*
Duty Holder – The Interim Chief Executive	***Mark Fowler***	***01582 546000***
Responsible Person – Corporate Director- Inclusive Growth	***Gerard McCleave***	***01582 546000***
Jointly Accountable Responsible Person –Director Property, Construction and Housing Delivery	***Roger Kirk***	***01582 546000***
Head of Building and Technical Services Luton Council *(Responsible Manager)*	**Ray Frampton**	***Office: 01582 546242 Mobile:***
Housing Asset Manager Luton Council (Jointly Accountable Responsible Manager)	**Abdul Kahir**	***Office: 01582 546208 Mobile: 07798 672243***
Responsible Operator – Senior Project Manager	***Darren George***	***Office 01582 546893***
Compliance Co-ordinator (Asbestos) Contracts Manager Repairs Manager Refurbishment Manager New Build Manager	**Linda Bates Paul Webb John Price Andrea Innes Richard Melhuish**	***Mobile 01582546247 07852102162 07770998617 07768737895 07834612804***
Survey Managers Penningtons Consultants Ltd. (Out of Hours contact)	***David Brown***	***Office: 01928 568842 Mobile: 07912 271353***
Asbestos Removal Managers AA Woods (Out of Hours Contact)	***Ben Crawley And Dave Pienaar***	***Office: 01279 444630 (opt 2) Mobile: 07989488646 Mobile: 07957569059***

Appendix 10

MAS + PAS = Total Score	Risk Code	Management Actions
Score of **18 and over**	**A**	**High risk** material in **poor condition**: Restrict access and remove as soon as practicable.
Score of **15 -17**, or **damage of 3**	**B**	**Medium risk** material possibly **damaged or in poor condition**: Remove. as soon as practicable.
Score of **9 -14**	**C**	**Low risk** material: Encapsulate/repair and seal any damaged areas within 6 months then monitor condition annually within non-domestic (communal) areas, and within 48 months within domestic areas. Remove prior to significant maintenance or planned works.
Score of **8 and under**	**D**	**Very Low risk** material: Monitor condition periodically within 60 months. Remove prior to significant maintenance or planned works.
Score of **0 (zero)**	**E**	**No Asbestos Detected**

High and Medium Risk Materials – Risk Codes A-C
High and medium risk materials shall be subjected to remedial measures or removal as appropriate to effectively manage the material and prevent any possible exposure to asbestos fibres.

All areas identified as containing ACMs where the overall risk is 14 or above will have access restricted until the ACM is encapsulated or removed to ensure all personnel, residents, in-house contractors, subcontractors and visitors, as well as third parties, are not exposed to the ACMs.

Low and Very Low Risk Materials – Risk Codes D-E
Low risk items may be worked upon or removed by personnel having a documented risk assessment, plan of work, documented training for this type of work, having the appropriate personal and respiratory protective equipment (PPE), can decontaminate themselves and the work area and understands the implications and requirements for generating, and the disposal of Hazardous Waste (all as per the requirements of CAR 2012).

If liable to damage during the process of removal, notification for some of this work will still be required to the HSE (on-line) before it commences all in accordance with the 'Notifiable Non-Licensed Work' (NNLW) category set out within CAR 2012.

The overall Risk Assessment provides a risk classification only to assist the Duty Holder in consistently prioritising the risk from ACMs. Where an ACM is present, there is no "safe" score that will confer absolute freedom from risk to health. Any asbestos encapsulation, removal or remedial works must be carried out in accordance with the procedures set out above.

Appendix 11 - ASBESTOS TRAINING MATRIX FOR Luton Council

Luton Council Asbestos Training Matrix:

Asbestos Awareness Training	A	B	C
The properties of asbestos and its effects on health, including the increased risk of lung cancer for asbestos workers who smoke	✔	✔	✔
The types, uses and likely occurrence of asbestos and ACMs in buildings and plant;	✔	✔	✔
The general procedures to be followed to deal with an emergency, for example an uncontrolled release of asbestos dust into the workplace	✔	✔	✔
How to avoid the risks from asbestos, for example for building work, no employee should carry out work which disturbs the fabric of a building unless the employer has confirmed that ACMs are not present	✔	✔	✔
Further Training			
Operations which could result in asbestos exposure and the importance of preventive controls to minimise exposure		✔	✔
How to make suitable and sufficient assessments of exposure to asbestos		✔	✔
The Control limit and the purpose of air monitoring			
Safe work practices, control measures, protective equipment. How to limit exposure and spread of asbestos		✔	✔
Procedure for recording, reporting and correcting defects.		✔	✔
Selection and use, cleaning, maintenance and storage of RPE and PPE		✔	✔
Achieving and maintaining a good face seal, fit tests, the importance of being clean shaven		✔	✔
Hygiene and decontamination requirements		✔	✔
Waste handling procedures		✔	✔
Emergency Procedures	✔	✔	✔
Work which requires an HSE Licence		✔	✔
Introduction to the relevant regulations, approved codes of practice and guidance that apply to work with asbestos		✔	✔
Other work hazards including working at height, electrical, slips, trips and falls		✔	✔
Advanced knowledge			
CAR 2012, L143, HSG 227, , HSG 247, HSG 248			✔

KEY:

A: Basic awareness; for those staff who may come into contact with asbestos and those who receive enquiries over the phone (i.e. RCC Staff, Reception Staff, Housing Officers and Sheltered Scheme Officers.

B: Level 2 awareness; for those staff who work on non-licensed asbestos materials including BTS Trading for the limited number of approved non-licensed tasks (i.e. Operatives and Supervisors)

C: For those staff with additional / named duties under the Asbestos Management Plan (i.e. Senior Managers, Project Officers and Supervisors)

Appendix 12 - ASBESTOS STEERING GROUP - TERMS OF REFERENCE

1. PURPOSE

The Asbestos Steering Group has been formed to act as a strategic group to help continue to drive the asbestos compliance agenda on behalf of all stakeholders within Wider Luton Council (Luton Council) Building and Technical Services BTS).

2. MEMBERSHIP

The members have considered the composition of the group and agreed that the individuals named below will represent the interest of Luton Council BTS on asbestos matters. The group shall comprise:

- Housing Asset Manager	Luton Council (Chairperson)
- Senior Project Manager/Asbestos	Luton Council
- Head of BTS/Contracts Manager	BTS Trading
- Health & Safety Officer	Luton Council
- BTS Trading Operative	BTS Trading
- Tenant/Leaseholder	Resident representative
- Consultant	If employed
- Housing Services Manager `	Luton Council Housing Management

Any additional members or replacement members should only be agreed with the consent of the other group members.

Other periodic attendees will be at the invitation of the group members and likely to include representatives from Luton Council Housing Management, I.T (information technology), BTS Trading Managers, and Asbestos/Asset Management Data Administrator.

Periodic attendance may also include the appointed asbestos surveying partner, Penningtons, and the appointed asbestos remediation/removal partner AA Woods.

3. DECISION MAKING

The Group will reach its decisions by a majority consensus of those members present. Decisions cannot be blocked by non-attendance.

4. REPORTING

Minutes and associated actions arising will be copied to the Manager of Luton Council BTS.

This group will also report into the Housing and Community Living Department Senior Management Team and periodically to the Luton Council corporate Health and safety Forum (specifically including the annual compliance review summary).

5. FREQUENCY OF MEETINGS

The Group will generally meet 4 monthly (3 times a year), unless matters arise from operation, or performance of any of the asbestos consultants, or contractors employed by Luton Council BTS that require additional meetings.

In the event that an unscheduled meeting of the Group is required, a meeting shall be convened by the Chairperson with not less than five (5) Working Days' notice (unless all members agree a shorter period) stating the required agenda. Each such meeting shall deal only with the matters listed in its agenda (unless all members agree otherwise).

6. KEY FUNCTIONS OF THE GROUP

- To be consulted on the appointment of asbestos surveying consultants and asbestos removal contractors.
- To develop, monitor and review an Asbestos Action Plan.
- To monitor compliance with legislation, published guidance and approved codes of practice.
- To undertake periodic reviews of all Luton Council BTS asbestos surveying contracts and removal contracts and related performance.
- To ensure a compliant survey programme is adopted, implemented and periodically reviewed.
- To review the asbestos register and management actions arising.
- Review processes and methods of achieving continuous improvement.
- Review provision of asbestos related information to residents and contractors.
- Monitor and review Key Performance Indicator's against Targets (Luton Council BTS's own and that of contractors / the BTS Trading DLO).
- Prepare periodic reports to the senior management team regarding asbestos compliance (and annual asbestos compliance review summary).
- To develop, monitor and review the Asbestos Management Plan (12 monthly formal endorsement interval);
- To develop, monitor and review the Asbestos Policy and Procedure.
- To develop, monitor and review the Asbestos Resident's Communications Strategy and related template documentation.
- To monitor the appropriate development and use of the Asbestos Register system.
- To review any dangerous incidents, or 'near misses' and ensure lessons are learned.
- To periodically review these terms of reference.

7. EXCLUSIONS

This group is not responsible for ensuring asbestos compliance on development schemes, or compliance in relation to Luton Council Corporate stock (schools, offices, libraries, leisure facilities, etc).

8. AGENDA

The routine agenda is to be defined and agreed in detail at the inaugural Asbestos Steering Group meeting.

The following represents an initial draft agenda for development accordingly:

ASBESTOS STEERING GROUP MEETING AGENDA

Luton Council BTS

ASBESTOS STRATEGY AND REGULATORY COMPLIANCE SERVICES

DATE:

VENUE: Luton Council BTS Offices, Central depot, Kingsway, Luton

1. Apologies and Introductions (new or invited attendees)
2. Minutes of last meeting
3. Actions arising from minutes of last meeting.
4. Review relevant actions from last Surveying / Removals contract performance management meetings.
5. Surveying Consultants KPI's – review performance against targets/ benchmarks
    a. Previous Month / quarter
    b. Year to date
6. Removal/ Remediation Contractors KPI's – review performance against targets/ benchmarks
    a. Previous Month / quarter
    b. Year to date
7. Register and I.T:
    a. Survey Programme and proportions surveyed (against plan)
    b. Register System Development/ implementation + progress against targets.
    c. Use/ auditing use (access and reference to register)
    d. IT issues + system development and process improvements
8. Asbestos Action Plan: Progress review and update

9. Early Warnings / Significant Compliance Events
10. Communications: Review against ‘Communications Strategy’
11. Training: Review against Matrix (and repeat cycles)
12. Resident Feedback (including compliments/ complaints resolution/ trend analysis)
13. Financial update:
    a. Budgets + VFM
    b. Expenditure against anticipated (profile + payments)
14. Contract audit reports (if any)
15. Risk Register
16. Policy compliance issues (including changes in regulation / guidance)
17. Health and Safety
18. Annual Compliance Review and Position Statement: update to Board
19. Any other business
20. Date of next meeting

PERIODIC OR INITIAL AGENDA ITEMS:

21. Core Group Terms of Reference (Periodic Review)
22. Actions arising from process mapping workshop.
23. Review/ update of Process Map
24. Review/ update of Partnering Charter
25. Procurement update (relevant Luton Council BTS parallel contracts e.g. Decent Homes/ Major Works)