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Medway Council Asbestos Management Responsibilities Flow Chart ........................................................................... 34
1. **Introduction**

1.2 This document sets out Medway Council’s policy, management plan and procedure for managing asbestos.

1.3 This management plan details the approach that will be adopted by Medway Council with regard to the day to day management of asbestos in the council housing stock, and any sites or operations which fall under the responsibility of the Housing Revenue Account service of the council.

1.4 Housing Services maintains and repairs the council’s domestic premises in accordance with current legislation, ensuring the council’s statutory duties are met.

2. **Purpose**

2.1 The Control of Asbestos at Work Regulations 2012, regulation 4 brings a specific duty to manage the risk from asbestos containing materials in non domestic premises. All common areas of domestic council properties fall within the scope of this legislation.

2.2 To comply with this legislation, Medway Council, acting as the duty holder, has adopted a pro-active approach to asbestos and its control in order to ensure the safety of the council staff, contractors, tenants and anyone else who may be affected by the council's undertakings in this regard.

2.3 The aim is to ensure that Medway Council has effective arrangements for managing asbestos in Medway’s retained housing stock, including communal and ancillary areas such as garages and brick built sheds.

2.4 To meet this aim, Medway Council will;

- Assign specific responsibility for managing asbestos risks in Medway’s retained housing stock
- Establish procedures for managing asbestos in all such premises

2.5 The above will discharge the general duty of care arising from the Health and Safety Act 1974 and the Management of Health and Safety at Work Regulations 1999 (as amended).

3. **Scope**

3.1 The scope of this management plan does not include working on asbestos containing materials during maintenance/repair activities (which is covered by the contractors Asbestos Management Plan), or major refurbishments etc. by contractors (i.e. those matters covered by regulations 6,7 or 10 of the Control of Asbestos Regulations 2012.
and the Construction Design and Management CDM 2015 except with regard to the provision of information, to those likely to be at risk, on the presence of asbestos, prior to any disturbance of the material.

3.2 The specific ‘duty to manage’ requirement under the Control of Asbestos Regulations 2012 does not apply to any domestic property. However the general duties under the Health and Safety at Work etc. Acts 1974 require employers to ensure the health and safety of employees and others so far as reasonably practicable. The Management of Health and Safety at Work Regulations 1999 also require employers to assess the health and safety risks to third parties, such as workers carrying out work in the premises and tenants, who may be affected by activities connected with their business and to make appropriate arrangements to protect them from this.

3.3 The council has an obligation to ensure any contractor working on asbestos containing materials has an adequate asbestos management plan and all contractors have to submit their asbestos management plan to the council or its agents for scrutiny before they are allowed to work on council property.

4. Legal Background

4.1 External

- The Control of Asbestos Regulations 2012
- The Management of Health and Safety at Work Regulations 1999
- HSG 264 – The Survey Guide
- Work Place (Health and Safety and Welfare) Regulations 1992
- The Construction (Design and Management) Regulations 2007
- The Defective Premises Act 1972
- Environmental Protection Act 1990, S79.
- Controlled Waste Regulations 1992,
- Managing asbestos in buildings: A brief guide – INDG 223

4.2 Internal

- Corporate Asbestos Policy
5 Policy Statement

5.1 This asbestos management plan describes the arrangements in place across the portfolio of Medway Council to ensure the exposure to asbestos is prevented as far as reasonably practicable.

5.2 Medway Council will:

• Take all reasonable steps to ensure that materials in premises likely to contain asbestos are identified
• Maintain an up to date written record of the location, condition, extent and nature of presumed asbestos containing materials
• Carry out an assessment of the risk to staff, visitors, residents, contractors and any others who may be exposed to asbestos containing materials (ACM’s)
• To carry out ongoing monitoring of the condition of ACM’s and, on a basis of risk, repair or remove the materials as and when appropriate
• Develop a management strategy for all Medway Council occupied premises and ensure that these are monitored, audited and reviewed regularly; and inform staff and other building users of the nature and extent of any known or suspected ACM’s,

6 Asbestos Management Plans

6.1 All Medway Council occupied premises must have an Asbestos Management Plan in place. This plan will look at the risk assessment undertaken for the ACM’s on the premises and set out what is going to be undertaken, and when. It will include clear lines of responsibilities and mechanisms for regular monitoring and review. The type of information which will be included is listed below:

• Details of how the location and condition of ACM’s is recorded
• Priority assessments
• A table of priority for action
• Decisions about management options and rationale
• A timetable for action
• Monitoring arrangements
• Employees and their responsibilities
• Training records and arrangements for employers and contractors
• A plan of implementation for new procedures, including those for external contractors
• Those mechanisms for passing information about the location and condition of ACM’s to all those who may need it
• Who will oversee the quality of the entries made on the management plan
• A procedure for review of the plan, including a timetable
• Resident awareness and advice
7 Responsibilities

Duty Holder

7.1 Medway Council’s Head of Housing Management and advised by the Health and Safety Compliance Officer will in most circumstances act as the duty holder, individual site or area managers, together with any other organisation or persons designated as the “Duty Holder” under the Control of Asbestos Regulations 2012, Regulation 4, will have a direct impact into the effective application of this Management Plan and therefore are responsible for compliance.

7.2 The Duty Holder will ensure that:
   - The asbestos management plan and subsequent action plan, implemented for all Medway Council owned or controlled premises including a current asbestos register for all known or suspected ACM’s
   - That the content of the asbestos management plan and action plans are communicated to all those who may through their work activity disturb any ACM.
   - Ensure that the asbestos management and action plan are reviewed at regular intervals and monitor its effectiveness

Responsible Person

7.3 The nominated responsible person will:
   - Hold copies of the relevant management and action plans for all sites under their control
   - Also act as the emergency contact point for their sites and hold a list of competent asbestos contractors to deal with emergency works

7.4 Medway Council will ensure that:
   - The asbestos register is updated as necessary following damage, maintenance or building work, repair removal and routine monitoring of the condition of ACM’s
   - To maintain all documentation relating to asbestos including: air monitoring, disposal notes etc.
   - Hold an up to date copy of the asbestos register, management and action plan and make sure it is readily accessible at all times to whoever may need it
   - Monitor the condition of known or suspected ACM’s on their premises
   - Ensure copies held in emergency plan boxes are kept updated
   - Ensure all work where asbestos is likely to be disturbed is undertaken by licensed asbestos contractors
   - Issue permit to work or permit to enter where proposed work is in an area containing asbestos
   - Label asbestos containing materials in common parts and ensure the maintenance of these labels
   - Appoint a contact for staff to report damage to suspected Asbestos Containing Materials.
Site Management and Their Staff

7.5 All site managers and their staff have a responsibility:

- To notify the responsible person if they have any reason to suspect that the asbestos or assumed asbestos containing materials have been disturbed
- To comply with any procedures put in place locally to ensure that the risks posed to their health by any exposure to asbestos containing materials are adequately controlled

8. **Survey Programme**

8.1 Medway Council has a rolling programme of asbestos surveys to comply with best practice guidelines and Medway Council’s policy. When the programme is completed, all of our Housing portfolio will have had a management survey completed, refurbishment and demolition survey where required.

8.2 Properties that have not been surveyed will be assumed to contain asbestos and any damaged assumed asbestos containing materials must be reported.

8.3 A number of residential properties under the control of Medway council have already had asbestos management surveys undertaken, and already form part of the council’s asbestos register, although this does not fall within the scope of the Control of Asbestos Regulations 2012.

8.4 All residential properties under the control of Medway Council which become vacant have a full management survey undertaken, all major repair and maintenance works via our planned programme have an applicable Refurbishment and Demolition survey undertaken prior to works. All relevant information is passed onto contractors prior to any works commencing and the results are stored on the asbestos register and for projects included within the CDM Project Information Pack as a significant hazard.
9 The Risk Assessment

9.1 The risk assessment can be broken into two steps, step 1 includes a material assessment and step 2 a priority assessment. The material assessment looks at the type and condition of the ACM and the ease with which it will release fibres if disturbed. The priority assessment looks at the likelihood of someone disturbing the ACM.

Step 1 - Material Assessment

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

b. HSG 264 recommends the use of an algorithm to carry out the material assessment. The algorithm used in HSG 264 considered four parameters that determine the risk:
   - Product type
   - Extent of damage
   - Surface treatment
   - Asbestos type

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

   - Scores of 10 or more are high risk
   - Scores of 7 to 9 are medium risk
   - Scores of 5 to 6 are low risk
   - Scores of 4 or less and very low risk material

The material assessment algorithm shown in HSG264 is reproduced here on the next page:
## Material Assessment Algorithm

<table>
<thead>
<tr>
<th>Sample variable</th>
<th>Score</th>
<th>Examples of scores</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Product type (or debris from product)</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1</td>
<td>Asbestos-reinforced composites (plastics, resins, mastics, roofing felts, vinyl floor tiles, semi rigid paints or decorative finishes, asbestos cement etc)</td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>Asbestos insulating board, millboards, other low-density insulation boards, asbestos textiles, gaskets, ropes and woven textiles, asbestos paper and felt</td>
<td></td>
</tr>
<tr>
<td>3</td>
<td>Thermal insulation (e.g. pipe and boiler lagging), sprayed asbestos, loose asbestos, asbestos mattresses and packing</td>
<td></td>
</tr>
<tr>
<td><strong>Extent of damage/deterioration</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>0</td>
<td>Good condition: no visible damage</td>
<td></td>
</tr>
<tr>
<td>1</td>
<td>Low damage: a few scratches or surface marks; broken edges on boards, tiles etc.</td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>Medium damage: significant breakage of materials or several small areas where material has been damaged revealing loose asbestos fibres</td>
<td></td>
</tr>
<tr>
<td>3</td>
<td>High damage or delamination of materials, sprayed and thermal insulation. Visible asbestos debris</td>
<td></td>
</tr>
<tr>
<td><strong>Surface treatment</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>0</td>
<td>Composite materials containing asbestos: reinforced plastics, resins, vinyl tiles</td>
<td></td>
</tr>
<tr>
<td>1</td>
<td>Enclosed sprays and lagging, AIB (with exposed face painted or encapsulated), asbestos cement sheets etc.</td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>Unsealed AIB or encapsulated lagging and sprays</td>
<td></td>
</tr>
<tr>
<td>3</td>
<td>Unsealed lagging and sprays</td>
<td></td>
</tr>
<tr>
<td><strong>Asbestos Type</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1</td>
<td>Chrysotile</td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>Amphibole asbestos including Crocidolite</td>
<td></td>
</tr>
<tr>
<td>3</td>
<td>Crocidolite</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Score</th>
<th>Potential to release asbestos fibres</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>10 or more</strong></td>
<td>High</td>
</tr>
<tr>
<td><strong>7-9</strong></td>
<td>Medium</td>
</tr>
<tr>
<td><strong>5-6</strong></td>
<td>Low</td>
</tr>
<tr>
<td><strong>4 or less</strong></td>
<td>Very Low</td>
</tr>
</tbody>
</table>
Step 2 – Priority Assessment

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

- Maintenance activity; The frequency of maintenance activity (planned and unplanned) needs to be taken into account
- Occupant activity; The activities undertaken in the area need to be investigated Likelihood of disturbance; The accessibility/vulnerability of the ACM needs to be looked at Human exposure potential; Looking at the number of people in the area, the frequency of use of the area, and the average time each area is in use
- The algorithm on the next page should be used to produce priority assessments (taken from HSG 277 – Managing Asbestos In Premises) Four general headings have been used and one or more factors can be taken into account and averaged under each heading to suit the circumstance. If you choose to use more than one factor under a general heading, then average the scores under that heading, rounding up where necessary

The resulting scores will enable the management of ACM’s to be prioritised some will require immediate action. In all cases the following action will be required:

- Communicate with employees, contractors and others
- Monitor the condition of the ACM
- Put a safe system of work in place

Options for managing the condition of ACM’s

- Label ACM
- Protect/Enclose the ACM
- Seal/Encapsulate the ACM
- Repair the ACM
- remove the ACM

Appendix 5 of HSG 227 A Comprehensive Guide to Managing Asbestos in Premises gives a series of flowcharts to help and aid a decision for choosing form the options above.
### Priority Assessment Algorithm

<table>
<thead>
<tr>
<th>Assessment Factor</th>
<th>Score</th>
<th>Examples of variables</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Normal Occupant Activity</strong></td>
<td>0</td>
<td>Rare disturbance activity (e.g. little used store room)</td>
</tr>
<tr>
<td><strong>Main type of activity in area</strong></td>
<td>1</td>
<td>Low disturbance activity (e.g. office type activity)</td>
</tr>
<tr>
<td></td>
<td>2</td>
<td>Periodic disturbance activity (e.g. industrial or vehicular activity which may contact ACM’s)</td>
</tr>
<tr>
<td></td>
<td>3</td>
<td>High level of disturbance (e.g. fire door with asbestos insulating board sheet in constant use)</td>
</tr>
<tr>
<td><strong>Secondary activities for area</strong></td>
<td></td>
<td>As above</td>
</tr>
<tr>
<td><strong>Likelihood of disturbance Location</strong></td>
<td>0</td>
<td>Outdoors</td>
</tr>
<tr>
<td></td>
<td>1</td>
<td>Large rooms or well ventilated areas</td>
</tr>
<tr>
<td></td>
<td>2</td>
<td>Rooms up to 100m²</td>
</tr>
<tr>
<td></td>
<td>3</td>
<td>Confined spaces</td>
</tr>
<tr>
<td><strong>Accessibility</strong></td>
<td>0</td>
<td>Usually inaccessible or unlikely to be disturbed</td>
</tr>
<tr>
<td></td>
<td>1</td>
<td>Occasionally likely to be disturbed</td>
</tr>
<tr>
<td></td>
<td>2</td>
<td>Easily disturbed</td>
</tr>
<tr>
<td></td>
<td>3</td>
<td>Routinely disturbed</td>
</tr>
<tr>
<td><strong>Extent/amount</strong></td>
<td>0</td>
<td>Small amounts or items (e.g. strings, gaskets)</td>
</tr>
<tr>
<td></td>
<td>1</td>
<td>&lt;10m² or &lt;10m pipe run</td>
</tr>
<tr>
<td></td>
<td>2</td>
<td>&gt;10m² to &gt;50m² or &gt;10m to &gt;50m pipe run</td>
</tr>
<tr>
<td></td>
<td>3</td>
<td>&gt;50m² or &gt;50m pipe run</td>
</tr>
<tr>
<td><strong>Human exposure potential</strong></td>
<td>0</td>
<td>None</td>
</tr>
<tr>
<td><strong>Number of occupants</strong></td>
<td>1</td>
<td>1 to 3</td>
</tr>
<tr>
<td></td>
<td>2</td>
<td>4 to 10</td>
</tr>
<tr>
<td></td>
<td>3</td>
<td>&gt;10</td>
</tr>
<tr>
<td><strong>Frequency of use of area</strong></td>
<td>0</td>
<td>Infrequent</td>
</tr>
<tr>
<td></td>
<td>1</td>
<td>Monthly</td>
</tr>
<tr>
<td></td>
<td>2</td>
<td>Weekly</td>
</tr>
<tr>
<td></td>
<td>3</td>
<td>Daily</td>
</tr>
<tr>
<td><strong>Average time area is in use</strong></td>
<td>0</td>
<td>&lt;1 hour</td>
</tr>
<tr>
<td></td>
<td>1</td>
<td>&gt;1 to &lt; 3 hours</td>
</tr>
<tr>
<td></td>
<td>2</td>
<td>&gt;3 to &lt; 6 hours</td>
</tr>
<tr>
<td></td>
<td>3</td>
<td>&gt;6 hours</td>
</tr>
<tr>
<td><strong>Maintenance activity</strong></td>
<td>0</td>
<td>Minor disturbance (e.g. possibility of contact when gaining access)</td>
</tr>
<tr>
<td><strong>Type of maintenance activity</strong></td>
<td>1</td>
<td>Low disturbance (e.g. changing light bulbs in asbestos insulation board ceiling)</td>
</tr>
<tr>
<td></td>
<td>2</td>
<td>Medium disturbance (e.g. lifting one of two asbestos insulation board ceiling tiles to access a valve)</td>
</tr>
<tr>
<td></td>
<td>3</td>
<td>High level of disturbance (e.g. remove a number of ceiling tiles to replace a valve or for recabling)</td>
</tr>
<tr>
<td><strong>Frequency of maintenance activity</strong></td>
<td>0</td>
<td>ACM unlikely to be disturbed for maintenance</td>
</tr>
<tr>
<td></td>
<td>1</td>
<td>&lt; 1 per year</td>
</tr>
<tr>
<td></td>
<td>2</td>
<td>&gt;1 per year</td>
</tr>
<tr>
<td></td>
<td>3</td>
<td>&gt;1 per month</td>
</tr>
</tbody>
</table>
Priority Assessment Algorithm

Worked example of a priority assessment

<table>
<thead>
<tr>
<th>Assessment factor</th>
<th>Variable selected</th>
<th>Score for each variable</th>
<th>Overall score</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Normal occupant activity</strong></td>
<td>Low disturbance activities</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td><strong>Likelihood of disturbance</strong></td>
<td>Room up to 100m²</td>
<td>2</td>
<td>Average = 2</td>
</tr>
<tr>
<td></td>
<td>Occasionally likely to be disturbed</td>
<td>1</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Human exposure potential</strong></td>
<td>Number of occupants</td>
<td>1-3</td>
<td>1</td>
</tr>
<tr>
<td></td>
<td>Frequency of use of area</td>
<td>Daily</td>
<td>3</td>
</tr>
<tr>
<td></td>
<td>Average time area is in use</td>
<td>&gt;6 Hours</td>
<td>3</td>
</tr>
<tr>
<td><strong>Maintenance Activity</strong></td>
<td>Type of maintenance activity</td>
<td>Low disturbance</td>
<td>1</td>
</tr>
<tr>
<td></td>
<td>Frequency of maintenance activity</td>
<td>&gt;1 per year</td>
<td>2</td>
</tr>
<tr>
<td><strong>Total priority assessment score</strong></td>
<td></td>
<td></td>
<td>7</td>
</tr>
<tr>
<td><strong>Material assessment score (supplied by surveyor)</strong></td>
<td></td>
<td>6</td>
<td></td>
</tr>
<tr>
<td><strong>Total material and priority assessment scores</strong></td>
<td></td>
<td>13</td>
<td></td>
</tr>
</tbody>
</table>
10  **Role, Responsibilities and Authority**

10.1 The Assistant Director of Physical and Cultural Regeneration will retain the overall responsibility for the implementation of this policy.

10.2 The Head of Housing Management is responsible for the operational delivery of this policy and the associated procedures and has the responsibility for ensuring that this policy complies with Regulatory and Legislative requirements and in meeting the Council’s Business Plan and budget.

10.3 All staff involved in tenancy management activities are responsible for implementing this policy.

11 **Monitoring, Review and Evaluation**

11.1 Senior management will monitor the effectiveness of this policy.

11.2 This policy will be reviewed every two years, or in line with legislative or regulatory changes.

---

**Policy Version Control Sheet**

<table>
<thead>
<tr>
<th>Policy Title: <strong>Asbestos Management Policy</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>Policy Author(s): Deputy Head of Housing Management</td>
</tr>
<tr>
<td>This Version: January 2020</td>
</tr>
<tr>
<td>Projected Date of Review: January 2022</td>
</tr>
<tr>
<td>Cross References: Tenancy management policy, Corporate Asbestos Policy</td>
</tr>
<tr>
<td>Amendments Made:</td>
</tr>
</tbody>
</table>
**Introduction**

1. The control of asbestos regulations 2012 and Medway Councils management of asbestos policy set the framework within which the asbestos management plan operates. The Medway Council framework lays out aims, individual responsibilities and general procedures for managing asbestos risk and this document must be referred to at all times in the development and review of this management plan.

2. This management plan is specific to Medway Council and aims to ensure that all known or presumed asbestos containing materials (ACM’s) within the premises are managed to effectively prevent exposure to the hazards associated with asbestos. It details all assessments made of ACM’s, and will give recommendations, priorities and deadlines for action.

**Identification and location of ACM’s – Asbestos Register**

3. The asbestos register for Medway Council has been compiled from management surveys and refurbishment and demolition surveys undertaken by consultants in accordance with HSE guidance document HSG 264. The register lists the type and location of ACM’s and makes a material assessment of the risk. The council currently operates an online web based data recording system.

4. A priority assessment has been undertaken based on the outcome of the material assessment and with due consideration of the additional factors of; occupant activity; likelihood of disturbance; human exposure potential; and maintenance activity. A copy of this is at appendix A.

**Location of Asbestos Register**

5. Medway Council has in place an online web based system for the asbestos register which is located using URL:

   [http://88.208.233.93:8080/AlphaTracker/login.a5w](http://88.208.233.93:8080/AlphaTracker/login.a5w)

   - Contact details for enquiries regarding the asbestos register: Asset Officer 01634 333113

Additional hard copies of the asbestos register site specific to our 8 homes for independent living schemes will be left on site in the scheme manager’s office. A further hard copy will be held in the emergency planning box.

**Responsibility for Updating Register**
6. The asbestos register will be updated by Medway Council's Asset Management Team following removal, repair, change in condition etc. of any ACM. Any additional hard copies of the asbestos register must be updated at this time.

**Provision of Information**

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

   All maintenance staff and contractors must be provided with details of any known asbestos materials in their area of work. This will be achieved by the use of the asbestos register which where applicable will be available of operatives PDA’s.

   For major refurbishment projects, in addition to the requirement for prior notification, it is the responsibility of the project coordinator to liaise with Medway Council to provide and collate all necessary information.

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

**Labelling of ACM’s**

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

9. Medway Council is responsible for ensuring that all contractors are advised as to the details of all known ACM’s within the location that they are to commence work. Relevant section of the asbestos register must be given to the contractor prior to commencement of works, and preferably tender documentation. Contractors will also be given details of action to be taken if further asbestos is suspected or encountered unexpectedly. Contractors must be informed of their responsibility to pass this information on to all or any sub-contractor under their control.

**Staff**

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

Staff will be given access to the online web based asbestos register

**Procedure for works on ACM’s**

**Work with Asbestos**

11. All work with asbestos containing materials shall be carried out in accordance with the requirements of the control of Asbestos Regulations 2012 and will be undertaken by licensed asbestos removal contractors. Prior to any asbestos works being undertaken, we will issue the contractor with all asbestos register and site survey information and then the contractor will supply a works specific asbestos Plan of Works and issue this to Medway Council.

**Asbestos Plan of Works**

12. Before any asbestos works commences the contractors must provide a detailed asbestos plan of works for the operations, to include:

- Details of property where the works are being undertaken
- Reference to the asbestos survey (Management or R&D that the plan of works has been compiled against)
- Scope of works (removal, manage, encapsulate or minor works)
- Programme of work
• Copy of HSE notification of ASB1 for non licenced and ASB5 for licenced works
• Proposed method of removal (appropriate risk assessment and details of removal contractor)
• Waste disposal and consignment note information
• RPE and PPE for operatives
• Air monitoring procedures (where applicable)
• Accident emergency procedures
• Probably duration of work
• Location of decontamination units and waste skip

Prior to submitting the above documentation, technical officers should refer to the asbestos register and any existing site surveys. This survey and the Medway Council Asbestos Management Plan, both of which incorporate details of the location and risk assessment of asbestos containing materials, should be made available to relevant contractors, staff and tenants.

**Completion of Licensed Works**

13. Before the enclosures are dismantled the contractor must arrange for an independent four stage clearance to be carried out and issue Medway Council with a certificate of re-occupation.

Example copy of an Asbestos plan of works shown on next page
### PROPERTY INFORMATION

<table>
<thead>
<tr>
<th>ADDRESS</th>
<th>REQUIRED WORK</th>
<th>DATE</th>
<th>CONTRACT SUPERVISOR</th>
<th>EMERGENCY CONTACT</th>
<th>EMERGENCY CONTACT NUMBER</th>
<th>CLIENT</th>
<th>CONTRACT</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>KITCHEN REPLACEMENT</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Medway Council – HRA Housing Services</td>
<td>VOID/RESPONSIVE REPAIRS/CYCLICAL DECORATION/CAPITAL WORKS</td>
</tr>
</tbody>
</table>

### MANAGEMENT SURVEY INFORMATION

### ASBESTOS REPORT

<table>
<thead>
<tr>
<th>INSPECTION NUMBER</th>
<th>ROOM/AREA</th>
<th>LOCATION</th>
<th>ASBESTOS TYPE</th>
<th>VOLUME</th>
<th>DESCRIPTION/CONDITION</th>
<th>RECOMMENDED ACTION</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>KITCHEN</td>
<td>CEILING</td>
<td>NAD</td>
<td>NA</td>
<td>LOW DAMAGE</td>
<td>NO ACTION REQUIRED</td>
</tr>
<tr>
<td>2</td>
<td>KITCHEN</td>
<td>FLOORING</td>
<td>CHRYSOTILE</td>
<td>6m2</td>
<td>LOW DAMAGE</td>
<td>REMOVE</td>
</tr>
<tr>
<td>3</td>
<td>KITCHEN</td>
<td>SINK PAD</td>
<td>NAD</td>
<td>NA</td>
<td>LOW DAMAGE</td>
<td>NO ACTION REQUIRED</td>
</tr>
<tr>
<td>4</td>
<td>KITCHEN</td>
<td>BOXING IN</td>
<td>CHRYSOTILE/A</td>
<td>3m</td>
<td>LOW DAMAGE</td>
<td>REMOVE</td>
</tr>
<tr>
<td>5</td>
<td>KITCHEN</td>
<td>WALLS</td>
<td>CHRYSOTILE</td>
<td>14m2</td>
<td>LOW DAMAGE</td>
<td>MANAGE (PATCH WORK BY MED INS IF NEEDED)</td>
</tr>
</tbody>
</table>

*NAD = No Asbestos detected

Copy of full management survey attached to plan of work

### ASBESTOS RISK ASSESSMENT

<table>
<thead>
<tr>
<th>INSPECTION NUMBER</th>
<th>ASBESTOS TYPE</th>
<th>RISK RATING</th>
<th>RECOMMENDED ACTION/CONTROL MEASURES</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>NAD</td>
<td>0</td>
<td>NA</td>
</tr>
<tr>
<td>2</td>
<td>CHRYSOTILE</td>
<td>3</td>
<td>WORK TO BE CARRIED OUT BY LICENSED CONTRACTOR</td>
</tr>
<tr>
<td>3</td>
<td>NAD</td>
<td>0</td>
<td>NA</td>
</tr>
<tr>
<td>4</td>
<td>CHRYSOTILE/AMOCITE</td>
<td>0</td>
<td>WORK TO BE CARRIED OUT BY LICENSED CONTRACTOR</td>
</tr>
<tr>
<td>5</td>
<td>CHRYSOTILE</td>
<td>0</td>
<td>WORK TO BE CARRIED OUT BY LICENSED CONTRACTOR IF REQD (MANAGE)</td>
</tr>
<tr>
<td>0</td>
<td>0</td>
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<td>0</td>
</tr>
<tr>
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</tr>
</tbody>
</table>

risk rating 1 to 4 = low 5 to 8 = medium 9 to 12 = high
## Asbestos Management Plan

### Decontamination and Removal Process

<table>
<thead>
<tr>
<th>Inspection Number</th>
<th>Asbestos Type</th>
<th>Items to Dispose</th>
<th>Recommended Procedure</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>NAD</td>
<td>NA</td>
<td>No Action Required</td>
</tr>
<tr>
<td>2</td>
<td>CHRYSOTILE</td>
<td>NA</td>
<td>Work to be Carried Out by Licensed Contractor</td>
</tr>
<tr>
<td>3</td>
<td>NAD</td>
<td>NA</td>
<td>No Action Required</td>
</tr>
<tr>
<td>4</td>
<td>CHRYSOTILE/AMOCITE</td>
<td>NA</td>
<td>Work to be Carried Out by Licensed Contractor</td>
</tr>
<tr>
<td>5</td>
<td>CHRYSOTILE</td>
<td>NA</td>
<td>Work to be Carried Out by Licensed Contractor</td>
</tr>
<tr>
<td>0</td>
<td>0</td>
<td></td>
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</tr>
</tbody>
</table>

**Name of Licensed Contractor Carrying Out Removal**

**Address of Licensed Contractor**

**Licensed Contractor Contact Details**

**Location of Asbestos to Be Collected**

**Planned Date of Collection**

**Date Consignment Certificate Received**

---

Relevant HSE guidance document attached.
METHOD STATEMENT

OBJECTIVE
To remove, encapsulate or undertake work on asbestos containing materials

TIME SCALE
1 person to work for 1 hour in a 7 day period between 8am-6pm daily

LABOUR, TRAINING AND COMPETENCY
All contractors working on site must have undertaken LEVEL 2 asbestos awareness training or have a professional qualification. All contractors working on site to undergo an introduction/tool box talk on mhs commercial services’ working procedures.

PLANT/EQUIPMENT
Power tools to be yearly PAT tested.
H RATED vacuum to be used where specified.
Contractors to carry clearly marked asbestos bags or tape.
Contractors must wear required PPE at all times.
Hand tools to be used when working on asbestos.

LICENSED CONTRACTOR
Management survey to be carried out prior to works commencing and a copy given to contractors working on site.
Licensed contractor to be issued management survey and instructed via email by Medway Council to remove and/or clear any asbestos detected.
Licensed contractor to issue Consignment note to Medway Council as soon as completed.
All work to be carried out in a safe and professional manner at all times.

LEVEL 2 ASBESTOS AWARENESS TRAINED CONTRACTOR
Management survey to be carried out prior to works commencing and a copy given to contractors working on site and signed for.
Asbestos plan of work to be issued to contractor and works to be carried out following Medway Council’s instructions.
Licensed contractor to issue Consignment note to Medway Council as soon as completed.
All work to be carried out in a safe and professional manner at all times.

WORK METHOD
In the event of an emergency, immediately stop what you are doing and call the Contract Supervisor on the number given in the property information of this document. If the Contract Supervisor is un-contactable, then please call Medway Council on 01634 333840.
Contractors are to contact the emergency services if necessary.

CONTRACTOR TO SIGN PRIOR TO WORK BEGINNING ON SITE

<table>
<thead>
<tr>
<th>CONTRACTORS NAME</th>
<th>CONTRACTOR SIGN</th>
<th>CONTRACTOR DATE</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
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<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

CONTRACTOR TO SIGN ON COMPLETION OF WORK

<table>
<thead>
<tr>
<th>CONTRACTORS NAME</th>
<th>CONTRACTOR SIGN</th>
<th>CONTRACTOR DATE</th>
</tr>
</thead>
<tbody>
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<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Medway TO SIGN UPON COMPLETION

<table>
<thead>
<tr>
<th>CONTRACT SUPERVISORS NAME</th>
<th>Medway SIGN</th>
<th>DATE</th>
</tr>
</thead>
<tbody>
<tr>
<td>0</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Monitoring of ACM’s

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

Medway Council already undertakes regular estate block inspections of common areas of the council properties. These inspections are attended by Building Inspectors, Housing Officers, residents and our contractor.

Training

15. Medway Council visiting staff are all to be provided with general awareness training to cover:

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

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

All technical and trades staff employed by the council will be required to attend asbestos awareness training seminars. In addition, contractors employed by the council will also be required to attend asbestos awareness seminars, typically delivered at toolbox talks.

Key employees will be suitably training in implementing this Medway Council policy and in dealing with asbestos related issues.

Medway Council training will include the following elements.

All key staff

a) That you can only be exposed to asbestos if ACM is disturbed thereby releasing fibres into the air that you breathe
b) That asbestos in good condition should be left in place, reported, recorded and managed
c) That any exposure to asbestos should be avoided and that the risk increase as the level, duration and frequency of exposure increases
d) That the increased risk to health from a one off accidental exposure is negligible ad not a cause for concern;
e) What to do if they find asbestos or a damaged material, which they think could contain asbestos;
f) What to expect from maintenance employees and building operatives

**Contractors, Maintenance and Building Operatives**

Contractors, maintenance and building operatives will be informed:

a) Of the points listed above for all “key staff”
b) What asbestos products are and when you are likely to find them
c) That they should never work on any building material without first knowing whether it contains asbestos
d) Of the procedure to follow before starting any work where building materials are to be disturbed
e) Of the safe working methods for working on ACM’s
f) What work they can and cannot do on ACM’s

**Asbestos Incidents**

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

a) Ensure the area is evacuated immediately. Close all windows and doors (where possible) to minimise fibre release and spread
b) Contact the Housing Repairs Team on 01634 733488
c) Do not enter the suspected area – it can only be entered by suitably trained personnel who are wearing appropriate personal protective equipment (PPE) and respiratory protective equipment (RPE)
d) If no record of the suspect material exists, samples will be taken by fully trained Asbestos Surveyors and a UKAS accredited laboratory will carry out subsequent analysis for the council. If necessary, an approved licensed contractor and environmental analyst will be appointed to make the area safe and undertake airborne monitoring to assess the extent of the surface and airborne contamination
e) Wait until the area is declared safe by the nominated surveyor or analyst
f) A list of anyone accidentally exposed to asbestos fibres must be compiled and passed to the individual’s employer. For Medway Council staff, the information must be detailed on the council accident/incident reporting form and passed onto the relevant line manager. This report should details the exact nature and known extent of any exposure

*Please see appendix B for the Asbestos Emergency Procedure
Review of Management Plan

17. The asbestos management plan will be formally reviewed by the Deputy Head of Housing with assistance from the Health and Safety Compliance Officer every 2 years and updated as necessary.

18. This review will include:

- Information contained in the asbestos register and update of it
- The condition of ACM's remaining on site, inspection reports
- Provision of information to contractor, consultants, staff etc.
- Communication with interested parties
- Recording on incidents and accidents and lessons learnt
- Incorporate any changes in legislation and to look at implementing any amendments, recommendations or changes to working practices that may become necessary.

Tenants, Residents and Right to Buys

19. In response to the duty of care owed by Medway to the above group, a leaflet “Asbestos in your home” has been provided in the tenants welcome pack which has been issued to all new Medway tenants. This contains appropriate explanatory asbestos information and officer contact details, should tenants have any concerns over suspect materials in their homes and confirms the management actions such as regular review and inspection regimes, that Medway have in place to ensure their safety.

20. Medway also respond to specific requests for more detailed asbestos information, within individual property addresses by producing relevant reports extracted from the online asbestos register. It is understood that the provision of such information must be handled in a sensitive and measured way so that individuals are not unduly alarmed and understand that asbestos in good condition will do no harm if left undisturbed. Such information will automatically be passed onto any person buying their property along with other statutory relevant information.

*Please see appendix A “Asbestos in your home”*
Recommendation and Timetable for Action

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

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

No Asbestos Detected

Buildings that have been surveyed and where no asbestos containing materials have been identified or suspected have been grouped here.

Whist there areas require no further monitoring or inspection regimes, it is important that all records undertaken to date (i.e. survey, site drawings, etc.) are properly maintained and that all information regarding these areas is effectively disseminated by Medway Council to all building managers and employees. It is just as important that contractors and employees are aware that no asbestos has been identified with a particular building as it is to inform them of any asbestos present. Additionally, it is vital that areas outside of the survey scope are taken into consideration, for example even after a management survey has found no asbestos to be present, further assessment may still be needed if the fabric of the building is to be altered, or demolished, etc. In addition it should be noted that no survey can categorically state that no asbestos is present within the fabric of the property given that limitations exist within all survey work.

Areas Yet To Be Surveyed and Areas of No Access

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

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

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

High/Medium Risk Material

These materials have been given a risk assessment score of either A or B. They present a medium to high risk rating, are a possible hazard to health in their current condition, and should be treated as a priority. It is probable that items are damaged, unsealed or friable and require immediate remedial works to mitigate or reduce the risk posed. Sites which have had a traditional type 1 survey (MDHS100) may require further assessment to confirm the presence of asbestos where it has been presumed or strongly presumed. Access to these areas should be centrally controlled or, where possible, restricted to ensure that no accidental disturbance of these materials occurs. A systematic programme should be undertaken to reduce the risk posed by ACM’s identified in this category. It is likely that the remedial options for these items will include either encapsulation or removal. Initial recommendations are given within the asbestos register.

Low Risk Materials

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

Very Low Risk Material

These materials will have been given a risk assessment score of D and present a very low risk rating and are unlikely to pose a significant risk to health in their current condition. Items should be inspected and their condition assessed regularly. These items are likely to require minimal remedial actions. Initial recommendations are given within the asbestos register and are likely to include measures such as labelling ACM’s and keeping an up to date record of their location and condition.
Monitoring the Asbestos Management Plan

The management plan requires that audit reviews be undertaken of not only the asbestos on the site but also the management plan itself. The following is a guide to:

Asbestos Audit

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

- Details of changes are put into the register
- Priority assessment value reviewed
- Programme in work required for remediation or removal

These asbestos audits are to be undertaken in addition to the regular block/estate inspections that are already carried out by Medway Council Building Inspectors, Housing Officers and Contractors.

System Audit

This is broken down into three areas of audit:

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

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

The System Audit

This will be in order to review the effectiveness of the system and will be carried out on a regular basis, initially this will be at 6 month intervals then after the first months yearly intervals it will clearly look at the process and system in detail on a random number of sites (eventually covering all sites). The review will also look at the management plan itself and revise the system as appropriate in line with the HSE Control of Asbestos Regulations 2012.

The system audit will review:

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

Any changes to the management plan will be made by the Deputy Head of Housing of Medway Council.

**Audit of Contractor and Specialists**

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

**Standard of work audits**

During and upon completion of work especially with newly appointed contractors or specialist, an audit of their standards of work will be undertaken to ensure they have complied with not only legislation and guidance etc. but also to specifications and tenders. Any air monitoring undertaken will be reviewed to ensure the area is acceptable for further occupation.
Appendix A – Asbestos in your home

Asbestos in your home

It is possible that your home contains materials made from asbestos. Asbestos fibres are strong and resistant to heat and chemicals. In the past, this led to their use in a wide range of building materials and products.

Properties built since the mid-1980s are very unlikely to contain asbestos in the fabric of the building. Properties built after 1999 are extremely unlikely to contain asbestos anywhere in the building.

If you are a council tenant, Medway Council will inspect any areas that you may be concerned about, and if appropriate, employ a specialist contractor to remove the asbestos.

Why is asbestos potentially a problem?

All materials containing asbestos can be harmful if fibres are inhaled. In recent years a number of alternative or substitute products have been developed.

What is asbestos?

Asbestos is a naturally occurring mineral made up of many small fibres. There are three main types.

Day to day exposure to asbestos

The Health and Safety Executive confirms that there is a very low level of fibres in the air everywhere because asbestos has been used so extensively in the past. Exposure to this low level of fibres is unlikely to harm people’s health.

However, high, short-term exposure to asbestos fibres can occur during do-it-yourself work. For this reason, try not to raise dust when working with materials which might contain asbestos and avoid sanding or drilling. If in doubt, do not touch it.

Where will you find asbestos products or materials in your home?

It is not always easy to tell whether a product contains asbestos, as modern asbestos-free materials often look similar. Remember it is usually older products that contain asbestos.
The following areas and appliances are where asbestos may be found:

- Cold water cisterns
- Corrugated roof sheeting
- Flues and gutters
- Rainwater downpipes
- Roof slates and roofing tiles
- Vinyl floor tiles
- Boiler flues/heating installations
- Textured coatings such as artex
- Asbestos cement panels
- Storage heaters
- Garages and outbuildings
- Service ducts in kitchens/bathrooms
- Door linings/header panels

How do you know if a material contains asbestos?

Identifying asbestos products can be difficult but if you think a product contains asbestos but are unsure, the manufacturer or supplier should be able to help you. Alternatively, contact Medway Council using the information given below.

Remember, products containing asbestos can look very similar to those not containing asbestos - if in doubt seek advice.

What should you do about asbestos in your home?

Do not panic if you have asbestos materials in your home. Remember, if the asbestos materials are in good condition, removal should not be necessary and disturbance of such materials by non-specialists could in fact cause more risk to your or your family's health.

Contact the council who will engage a specialist contractor to carry out the work on any notifiable asbestos materials. Do not disturb asbestos materials under any circumstances. If you are in any doubt, contact the Housing Repairs on 01634 733499.

Dos and don’ts when carrying out DIY:

- If you suspect that you have asbestos materials in your home you should NOT carry out any other works on or near until the materials suspected as being asbestos containing materials are tested and the appropriate advice given
• Do not attempt work on sprayed asbestos, lagging or insulating boards, as this must be undertaken by a licensed asbestos removal contractor. If in doubt, seek advice.
• Do not drill, cut or disturb asbestos. Do not scrape or sand asbestos materials before painting and decorating. Some types of asbestos materials are very soft and can release large numbers of fibres if rubbed or scraped.

Where can you get further advice?

Further information and advice on asbestos is available from a number of sources.

You can contact Medway’s Housing Repairs Team on 01634 73349.

You could consult your general practitioner or health board if you are concerned about your own health or the health of a member of your family and think that you or they have been exposed to asbestos.

The basic rule is, if in doubt ask ...Medway Council is here to help.
Appendix B – The Emergency Procedure

The Emergency Procedure

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

1. If material, suspected of containing asbestos is damaged then the area must be immediately vacated. The windows should be closed and the door locked where possible. The Housing repairs team on 01634 733499 should be contacted immediately

2. The asbestos database will be checked to identify the material. Where asbestos is identified or the information is inadequate, Medway Council Housing Services in conjunction with its appointed Asbestos Contractor will undertake a risk assessment of the area which will include bulk sampling and reassurance air tests

3. If the material is found to be non asbestos containing, the area will be re-opened

4. Should the material be found to contain asbestos, a scope of work must be agreed with the asbestos contractor and contract administrator for the council to repair or remove the material as soon as possible

5. The asbestos removal contractor and environmental analyst should be appointed using normal Medway Council procedures if possible. The removal contractor will submit notification to the HSE where appropriate. The area should remain closed until the asbestos works are complete and the environmental analyst has issued the relevance clearance certificates

6. It may be necessary to programme further asbestos removal works

7. All details of an incident must be recorded using the Medway Council corporate accident/incident form, to be investigated by the relevant line manager.

8. Asbestos records will be updated

Emergency Contact Numbers

Deputy Head of Housing

01634 333840

Or

For Out Of Hours between the hours of 17:15 and 08:45

07740 590379
Appendix C – Medway Council Asbestos Management Responsibilities Flow Chart

Medway Council Asbestos Management Responsibilities Flow Chart

- Head of Housing Management
  - Deputy Head of Housing Management
  - Contracts Manager
    - Asbestos Surveyors/Consultants – ASI Asbestos
    - Licensed Asbestos removal contractor
  - Capital Projects Manager
    - Project Managers – Building and Design Services