

Asbestos Management Plan

April 2025

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CONTENTS	PAGE
1. Aim	4
2. Legal duties & scope	5
3. Management approach	6
4. Responsibilities Duty Holder & Nominated Competent Persons Arrangement of Responsibilities Structure Chart (Appendix 1) 1. Organisational Arrangements	7 8-12
5. Arrangements / Asbestos safety processes General explanation Asbestos Safety Processes Repairs, Capital Works and Adaptive Work Process Charts (Appendices 2 to 3) 1. Asbestos Safety Process for Repairs 2. Asbestos Safety Process for Capital Works	13 14-15
6. Arrangements (monitoring of known ACMs) Re-surveying / monitoring of ACMs in situ Labelling of known ACMs	16 16
7. Training Informing and Training Staff Informing Residents	17 18
8. Monitoring and review of the Hexagon Asbestos Management Plan	19
9. Guidance for dealing with identified asbestos types Generally expected controls	20
10. Emergency asbestos safety process Process Chart (Appendix 4) 1. Emergency Asbestos Safety Process Asbestos Incident Log (Appendix 5)	21
11. Appendixes	23

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1. Aim

- 1.1** The overall aim of this Management Plan is to ensure that all Asbestos Containing Materials (ACMs) within Hexagon managed housing stock are effectively managed and risks reduced to prevent harm to anyone who works on our buildings or to our building occupants.

This plan stipulates the specific actions and responsibilities of the Duty Holder, other Hexagon managers, staff and contractors working on behalf of Hexagon. It also details the process by which surveys will be commissioned / reviewed, management action decided, and records managed.

By effectively managing identified or presumed ACMs in properties we will ensure compliance with legislation and reduce the risk of exposure to any asbestos fibres.

2. Legal duties & scope

2.1 All work with asbestos containing materials is governed by the Control of Asbestos Regulations (CAR) 2012. Hexagon has a legal duty to ensure that risks associated with exposure to asbestos within Hexagon's housing portfolio are managed. In particular:

- Regulation 4 of CAR 'Duty to manage asbestos in non-domestic premises' places a statutory duty to manage material which contains or may be presumed to reasonably contain asbestos within the common parts of the housing stock in its portfolio. This includes areas such as stairwells, lift motor rooms, tank rooms etc.

Additionally, Hexagon also has a duty to manage risks associated with ACMs inside dwellings when commissioning work within them. In these instances, the dwelling becomes a workplace. In particular:

- Regulation 5 of CAR 'Identification of the presence of asbestos' requires an assessment to identify the presence of asbestos, including its type and condition, before any building, maintenance or demolition work, liable to disturb asbestos, begins.
- Regulation 6 of CAR 'Assessment of work which exposes employees to asbestos' requires an assessment of risk of exposure to asbestos to be carried out, including stipulating control measures needed to prevent or reduce exposure.

Legal duties are also imposed through:

- Defective Premises Act 1972.
- The Housing Health and Safety Rating System (England) Regulations 2005.
- Homes (Fitness for Human Habitation) Act 2018.

3. Management approach

- 3.1 Health and Safety Executive (HSE) guidance is clear, if ACMs are in good condition and unlikely to be disturbed, they are of negligible risk. Therefore, Hexagon will follow a principal of managing ACMs in situ rather than presumptive removal which has the potential to increase risk to residents and others.

In following a policy of managing rather than presuming to remove ACMs, two asbestos safety workflow processes have been produced to guide staff and contractors on how different ACMs should be dealt with (see Appendixes 2-3). These are to be considered general guidance only and if there is any uncertainty about how materials should be managed advice must be sought from the Asbestos Projects Manager within the Property Safety Team.

Hexagon acknowledges that work on low-risk asbestos products can legally be carried out by contractors who do not hold an asbestos licence from the HSE, as set out in HSG 210, 4th Edition, 2017, 'Asbestos essentials: A task manual for building, maintenance and allied trades of non-licensed asbestos work'. It is nevertheless Hexagon's policy to only engage licenced asbestos removal contractors to undertake any work directly on or relating to asbestos.

Asbestos information and associated documents from surveys and remediation works are uploaded into Lifespan, the Hexagon's asset management system, to ensure that there is only one central register for all asbestos records. These records include survey reports and reviews, HSE notifications, RAMS, waste consignment notes and certification paperwork.

4. Responsibilities

The arrangement of responsibility within the organisation including the flow of asbestos information are set out in chart in appendix 1.

Duty Holder	Andy Vincent (Operations Director) 020 8778 6699 ext 7914 avincent@hexagon.org.uk	
	signature	date

Designated Appointed Person	Trevor Laurent (Asbestos Projects Manager) 020 8778 6699 ext 7982 tlaurent@hexagon.org.uk	
	signature	date

Asbestos Compliance Officer	Liteng Truong (Asbestos Compliance Officer) 020 8778 6699 ext 2028 LQuan@hexagon.org.uk	
	signature	date

Designated Appointed Person (Contingency)	Lysa Nicely (Head of Property Safety) 020 8778 6699 ext 2058 lnicely@hexagon.org.uk	
	signature	date

	Responsible role	Duties / responsibilities
4.1	Duty Holder Operations Director <i>Andy Vincent</i>	<p>To ensure there are adequate arrangements and resource in place for the identification and management of asbestos in the Hexagon managed housing stock.</p> <p>To ensure a suitable Asbestos Management Plan (AMP) along with associated procedures are in place for the identification, management and removal of asbestos and are kept up to date.</p>
4.2	Designated Appointed Person Asbestos Projects Manager <i>Trevor Laurent</i>	<p>In liaison / coordination with the Stock Improvement Manager, Responsive Repairs Manager and with relevant others, ensure suitable arrangements are in place for the management and monitoring (periodic inspections) of ACMs, including:</p> <ul style="list-style-type: none"> • developing the AMP and assisting in its implementation; • periodically reviewing and auditing the AMP to ensure it is effective; • ensuring suitable awareness training is given to staff; • providing general advice to staff and managers; • ensuring suitable arrangements are in place for confirming contractors are suitably competent in relation to asbestos; • ensuring all relevant information / documentation (asbestos surveys and remediation) is uploaded into the asbestos register and the asbestos register is kept up to date; • assisting with the prioritisation of, and management of asbestos survey recommendations; • to act as the gatekeeper for information flow to ensure asbestos surveys are commissioned by or on behalf of Hexagon. This includes works in relation to voids / A&A work, repairs and maintenance work, capital works as well as communal areas; • undertaking quality control reviews of surveys and associated recommendations; • translating recommendations into work orders to contractors; • procuring one (or more) suitable licenced contractors to undertake follow up works; • reviewing plans of work and proposed work methods; • contract management of licenced contractors and where appropriate analytical laboratories; • Provide oversight of the process for appointing licenced contractors and asbestos consultants engaged to undertake work related to asbestos; and • To advise on / assist with the response to any incident where it is known (or believed) that an ACM may have been disturbed.

	Responsible role	Duties / responsibilities
4.3	Asbestos Compliance Officer <i>Liteng Truong</i>	Support the Asbestos Compliance Manager in the discharge of his duties.
4.4	Designated Appointed Person (Contingency) Head of Property Safety <i>Lysa Nicely</i>	<p>To ensure arrangements and resources are adequate for robust management and oversight of the asbestos register. This includes ongoing maintenance of the system, ensuring it is fit for purpose, that it is kept up-to-date and is accessible to all those that need the information.</p> <p>Ensure the Property Safety Team has sufficient competent individuals to suitably manage the corporate asbestos surveying contract.</p> <p>Carry out the duties of the designated appointed person during times of absence.</p>
4.5	Duty to Co-operate Head of Property Services <i>Paul Connolly</i>	<p>Co-operate with the duty holder so far as is necessary to enable the duty holder to comply with their duties.</p> <p>To ensure all works undertaken in relation to repairs, maintenance and capital works are in line with the stipulations of Hexagon's Asbestos Management Plan and follow the asbestos safety processes (see Appendix 2 & 3).</p>
4.6	Duty to Co-operate Stock Improvement Manager <i>Rumana Khair</i>	<p>Co-operate with the duty holder so far as is necessary to enable the duty holder to comply with their duties.</p> <p>To ensure all capital works undertaken are carried out in line with the stipulations of Hexagon's Asbestos Management Plan and follow the asbestos safety process for capital works (see Appendix 3).</p> <p>In addition, they will ensure:</p> <ul style="list-style-type: none"> • all works are planned so that asbestos risks are identified early and suitably mitigated (see Appendix 3); • access is provided to Hexagon's Asbestos Register; • relevant asbestos information is provided to contractors / designers / Principal Designer in advance of projects to allow them suitable time to plan the works; and • that any identified or presumed ACMs are managed in line with Hexagon guidance (see Appendixes 3) and the Asbestos Project Manager is informed so that Lifespan is updated following any work.

	Responsible role	Duties / responsibilities
4.7	Duty to Co-operate Responsive Repairs Manager/ Reactive Maintenance Contract Manager <i>Sunil Mahadeo</i>	<p>Co-operate with the duty holder so far as is necessary to enable the duty holder to comply with their duties.</p> <p>To ensure all works undertaken in relation to repairs and maintenance are in line with the stipulations of Hexagon's Asbestos Management Plan and follow the asbestos safety process for repairs (see Appendix 2).</p> <p>In addition, they will ensure:</p> <ul style="list-style-type: none"> • Access to the Asbestos Register (Lifespan) is provided to contractors and others to allow them to plan and manage works; • any identified or presumed ACMs are managed in line with Hexagon guidance (see Appendix 2) and the Asbestos Project Manager is informed so that Lifespan is updated following any work. <p>To ensure specifically, in relation to directly (inc. via agency) employed repairs and maintenance staff that they:</p> <ul style="list-style-type: none"> • have been given asbestos awareness training as a minimum with an annual (or more frequently if needed) refresher; • are familiar with, and follow, the guidance and stipulations given in this AMP and associated appendixes; • are fully aware that only licenced contractors are to undertake any work directly on or relating to asbestos; • do not undertake any works without suitable consideration of the risk from asbestos; and • are given relevant and sufficient information from the Asbestos Register; and are briefed on and understand the emergency process should there be disturbance of suspected ACM (see Appendix 4).
4.8	Duty to Co-operate Project Managers, Repairs Managers and Surveyors (includes any staff who commissions / supervise relevant work on behalf of Hexagon)	<p>Co-operate with the duty holder so far as is necessary to enable the duty holder to comply with their duties.</p> <p>To ensure:</p> <ul style="list-style-type: none"> • all repairs, maintenance or capital works contractors they engage are aware of potential sources of and risks related to asbestos; • that only HSE licenced contractors are engaged to undertake any work directly related or which could impact on known / presumed ACMs; and • any identified or presumed ACMs are managed in line with Hexagon guidance and asbestos safety processes (see Appendixes 2 &3) and the Asbestos Project Manager is informed so that Lifespan is updated following any work.

	Responsible role	Duties / responsibilities
4.9	Repairs & maintenance contractors / Capital works contractors / Other works contractors	<p>To ensure they or any individuals / subcontractors working on their behalf for Hexagon:</p> <ul style="list-style-type: none"> do not undertake any works without suitable consideration of the risk from asbestos; do not carry out work to or that might affect known ACM or material which could reasonably foreseeably be ACM unless by a licenced contractor; have access to Hexagon's Asbestos Register and are provided with relevant and sufficient information; and provide Hexagon's Asbestos Projects Manager with a copy of any asbestos notification to the HSE on the day it is submitted and any completion documentation (clearance certificates, waste transfer notes etc.) after asbestos related works. <p>In addition, they must ensure all of their staff and staff of any contractors / subcontractors they engage on behalf of Hexagon:</p> <ul style="list-style-type: none"> have been given asbestos awareness training as a minimum with an annual (or more frequently if needed) refresher; are familiar with, and follow, the guidance and stipulations given in this AMP and associated appendixes; are familiar with how to access and review the Asbestos Register along with the importance of doing so before intrusive works are carried out; follow the asbestos safety processes for work in terms of requesting surveys if the asbestos register contains insufficient information; and provide Hexagon's Asbestos Projects Manager with a copy of any asbestos notification to the HSE on the day it is submitted and any completion documentation (clearance certificates, waste transfer notes etc.) after asbestos related works.
4.10	Managers & Team Leaders	To ensure relevant staff attend compulsory training and refresher training to the agreed standard and act in line with guidance given in the Asbestos Management Plan.
4.11	Human Resources Team	To organise the provision of Asbestos Awareness Training and all other recognised training for staff, keep suitable records and provide statistics to the Hexagon Directors Group / Board on a periodic basis.

4.12	All relevant staff	<p>To attend mandatory asbestos-related training and refresher training to a set standard where identified as needed. To carry out their work in a safe way in accordance with the asbestos management plan and guidance therein.</p> <p>To immediately report any incident where it is believed that a known or presumed ACM has been disturbed (see Appendix 4).</p>
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5. Arrangements / Asbestos Safety Processes

5.1 General explanation

The asbestos safety processes detailed below are intended to cover normal operations carried out by Hexagon, but due to the nature of the organisation and the wide variety of contexts in which asbestos was used it is possible that they may not be suitable for all works / circumstances. If there is any uncertainty regarding the implementation of the Asbestos Management Plan advice should be sought from the Asbestos Projects Manager.

It is important that when asbestos surveys are commissioned, these are to a suitable level. Further detailed guidance is provided in HSG264 2nd Edition, 2012, 'Asbestos: The survey guide'. The two levels of survey are:

- Management Survey (Non-intrusive) – The purpose is to reasonably identify any ACMs liable to be disturbed during normal use of the premises. This survey is **only** suitable for normal maintenance and repairs work.
- Refurbishment or Demolition Survey (Intrusive) – The purpose is to take all reasonable efforts to identify all ACMs within a building or within a specified area (e.g. a kitchen due for replacement) where **building work is planned**, including where intrusive work is needed (e.g. opening of boxing, behind panelling). Refurbishment surveys are project specific and a property may have several different refurbishment surveys carried out at different periods.

Before any intrusive work (work that would disturb the building fabric) is carried out to any premises, the relevant project / repairs manager needs to review whether there is a need for a refurbishment level survey. The asbestos register will only provide background asbestos information on the property. This information is still required under CDM, as pre-construction information, and will be incorporated into the project health and safety file for use in the development of the Construction Phase Plan.

Where archetypal survey information is extrapolated across dwellings / properties (based on similarities in age / construction). This **must only be** done with significant caution and any survey used as the basis for wider assumptions is suitably robust. The use of extrapolated information across property types is intended only to be an interim solution where confirmed information is not currently available.

Advice must always be sought from the asbestos projects manager, as per asbestos safety process, who will arrange for an appropriate survey to be carried out.

5.2 Asbestos Safety Process for Repairs (Process diagram 1)

See Appendix 2

Each time a request is raised to undertake responsive maintenance works, the Asbestos Register **must** be consulted to identify if any ACMs are present and consideration given to the possibility of damage or disturbance occurring as a result of the planned work. The asbestos register will primarily be populated with data from **asbestos management surveys**. The Asbestos Project Manager will be consulted if insufficient information is available for a determination to be made.

If insufficient information is available or intrusive works/refurbishment is planned, the Asbestos Project Manager will arrange for an appropriate survey to be carried out, according to the scope of work provided by the repairs team.

Should ACMs be present that would be disturbed by the work, the Asbestos Project Manager will make arrangements for the asbestos to be removed so that the work can proceed as planned.

The Asbestos Project Manager will give briefings to Hexagon's Repairs Team and Housing Advisors (who deal directly with residents and others) to allow them to screen / highlight repairs where ACMs may be affected.

5.3 Asbestos Safety Process for Capital Works (Process diagram 2)

See Appendix 3

The asbestos register **must** be consulted for background asbestos information whenever capital works are planned. This information will form part of the pre-construction information as required by CDM.

Capital works **will always** require an asbestos refurbishment or demolition survey to be carried out to identify concealed ACMs within the building fabric. This is a requirement under CDM 2015 and CAR 2012. This will ensure that asbestos risks can be assessed and mitigated to prevent accidental exposure occurring.

This will be arranged by the Asbestos Project Manager and a clear scope of work must be provided by the Stock Improvement Team. They should also, as far as possible, provide information to contractors, including the appointed Principal Designer, during the initial scoping of projects. This is to ensure that they can take a whole building approach to risk management in line with one of the key Hackitt recommendations.

Asbestos surveying will be conducted in advance of the works and the Principal Contractor must provide to the Stock Improvement Team a clear works programme, for use by the Asbestos Project Manager, to ensure surveys are co-ordinated with the work progress so that asbestos information is obtained early enough to be suitably mitigated.

Should ACMs be identified that would be disturbed by the work, the Asbestos Project Manager will advise on arrangements for the asbestos to be removed so that the work can proceed as planned.

5.4 Asbestos Safety Process for Voids and Adaptation works (Process diagram 1 & 2)

See Appendix 2 & 3

Each time a request is raised to carry out work in a void property (repair & maintenance/ refurbishment) or undertake adaptation work (refurbishment), the Asbestos Register **must** be consulted to identify if any ACMs are present and consideration given to the possibility of damage or disturbance occurring as a result of the planned work. The asbestos register will primarily be populated with data from **asbestos management surveys**. The Asbestos Project Manager will be consulted if insufficient information is available for a determination to be made.

The extent and level of the asbestos survey needed will depend on the amount of work planned for the void property and the nature of the adaptation works. **It is vital that contractors do not undertake any intrusive work before suitable asbestos information is available.**

Repairs and maintenance will follow the asbestos safety process for repairs (process diagram 1), whilst refurbishment works will follow the asbestos safety process for capital works (process diagram 2).

Unless a suitable and up to date asbestos management survey is available, a new asbestos management survey will automatically be commissioned to the whole dwelling with a targeted refurbishment survey to the parts of the property where refurbishment / intrusive works are planned. This is to make best use of the access to the property and to help Hexagon build a complete picture of ACMs within dwellings.

The Hexagon Voids / A&A Works Supervisor must provide a detailed scope of works to the Asbestos Project Manager. This is required to ensure that all parts of the premises that will be affected by the planned works are inspected and assessed for asbestos risks.

6. Arrangements (monitoring of known ACMs)

6.1 Re-surveying / monitoring of ACMs in situ

The decision to leave ACMs in situ will only be made based on a suitable survey which includes both the material assessment and priority assessment. This is to ensure both the potential risk of the material and the probability of its disturbance are considered.

In communal areas, where asbestos materials are to remain in place, periodic inspections are carried out to monitor and record the condition of the asbestos materials such that the risks are reduced as far as is reasonably practicable.

The timescale between inspections and the nature of these checks will be determined by the findings of the relevant asbestos survey, taking into account both the material and priority assessment. All known or suspected ACMs will be inspected at the following time intervals:

5 years – ACMs that are classed as ‘low risk’ **and** are inaccessible or located on a roof (except soffits).

Annually – All other ACMs that do not fall within the category above.

6.2 Labelling of known ACMs

Labelling will only be applied to identified ACMs (or in some cases items strongly presumed to be ACMs) which are not within the public access communal parts of the Hexagon housing stock. This is to prevent unnecessary confusion / alarm to residents and others.

When any ACM is identified a priority assessment will be carried out to ascertain the risk of the item being disturbed during normal use of the building. Any material deemed to be at reasonable risk of disturbance will either be removed, or suitable remediation work carried out.

7. Training

- 7.1 Any individual allocated specific responsibilities within the Asbestos Management Plan (AMP), or those who are responsible for supervising and controlling maintenance or building work in premises that contain or are presumed to contain ACMs will be provided with suitably detailed training in asbestos awareness and Hexagon's policies and procedures.

Training will form part of the mandatory induction for the relevant roles. Additional supervision will be arranged if there is a delay between an individual joining Hexagon and them being provided with training. Copies of training certificates will be maintained within HR files, or the relevant contractor's file.

- 7.2 Asbestos awareness training is provided in accordance with L143, 2nd Edition, 2013, ACoP 'Managing and working with asbestos' CAR 2012, paragraphs 232 to 235 and will include:

- properties of asbestos and its health effects;
- types, use and likely occurrence of asbestos in buildings and plant;
- how to avoid the risks from asbestos;
- asbestos hazards and risks;
- any relevant guidance and documentation;
- how hexagon manages asbestos risks the AMP and how it applies to your role;
- Hexagon's asbestos register and the role of asbestos surveys;
- Hexagon's asbestos safety processes for repairs and capital works;
- Hexagon's asbestos emergency procedure;
- how to report an asbestos concern;
- The absolute requirement that **only licenced asbestos contractors** undertake any work directly relating to or which could have an impact on known or presumed ACMs. This requirement is irrespective of whether the work planned legally requires the use of a licenced contractor; and
- That not adhering to the Asbestos Management Plan is a disciplinary offence.

- 7.3 Asbestos awareness training is delivered in-house four times during the year, on an annual basis, to maximise attendance and the bookings are arranged and monitored by Pius Bello, (Hexagon's Learning and Development Advisor)

Staff are required to receive their asbestos awareness refresher training on a 3-yr cycle to comply with regulation 10 (2)a '- to be given at regular intervals'. Training will be delivered sooner where:

- there are changes to legislations and guidance; or
- an asbestos incident occurs which exposes a weakness in Hexagon's asbestos risk management and procedures are amended.

7.4 Informing residents / leaseholders and other relevant individuals

- 7.4.1 Information has been sent to both residents and leaseholders to varying extents historically. This has included information outlining the potential hazards of asbestos containing materials, where these can be commonly found within homes and advice on how to deal with instances of damage.

All new tenants automatically receive relevant information in the Tenant Handover Pack.

- 7.4.2 Information is also available via the Hexagon public website, which includes:

- general asbestos information;
- a link to the on-line HSE asbestos microsite;
- how to report an asbestos concern to Hexagon; and
- how to report an out of hours asbestos emergency.

8. Monitoring and review of the Asbestos Management Plan (AMP)

8.1 In accordance with Regulation 4(10)a of CAR, the Asbestos Management Plan shall be reviewed and revised, as a minimum, every 12 months. This shall be a critical review of all the management processes and their effectiveness as well as overall progress made towards comprehensive asbestos survey records.

8.2 There may be changes to the structure of the organisation, or personnel changes that will require a revision to the AMP. When reviewing the AMP, some / all of the following will be included:

Effectiveness of current AMP:

- In preventing accidental damage to and possible exposure to airborne fibres;
- In controlling contractors;
- In highlighting the need for action to repair / remove ACMs; and
- In raising awareness of employees.

Issues which may affect the AMP, including:

- Changes to the organisational structure and/or staff;
- Resource levels;
- Changes to other Hexagon procedures; and
- Changes in building use / occupancy / refurbishment plans.

Instances of failure of the procedures, for example:

- Where procedures have not been followed and why not;
- Where procedures have been inadequate and why; and
- Where exposure to airborne asbestos fibres has occurred.

8.3 The Hexagon Asbestos Project Manager will carry out periodic audits of the organisations asbestos management arrangements to ensure they are suitable and that the risks to the organisation and individuals are being reasonably managed.

9. Guidance for dealing with identified asbestos types

9.1 Generally Expected Asbestos Controls

The Control of Asbestos Regulations 2012 applies to **all work** involving, or which may disturb, asbestos containing materials. It sets out minimum standards for the protection of workers and others not associated with the work from the risks associated with exposure to asbestos. Accordingly work with asbestos is classified into three groups:

- Licensable Work -This is work which presents a high risk of exposure and only companies with an asbestos removal licence issued by the HSE can carry out that work. This work requires a 14-day notification to the HSE prior to starting.
- Non-Licensable Work – This is work which present a low risk of exposure. An asbestos removal licence is not required and the HSE do not need to be notified prior to starting. Details of this class of work is provided in HSE publication HSG 210, 4th Edition, 2018, 'Asbestos essentials: A task manual for building, maintenance and allied trades of non-licensed asbestos work'.
- Notifiable Non-Licensable Work – This is a particular type of non-licensable work which presents an increased risk of exposure and additional controls have been stipulated. This work requires notification to the HSE prior to starting, however a minimum notification period is not demanded. Work on decorative coatings (artex) falls into this category.

Hexagon acknowledges that work on low-risk asbestos products can legally be carried out by contractors who do not hold an asbestos licence from the HSE. It is nevertheless Hexagon's policy to **only engage** Licenced Asbestos Removal Contractors (LARCs) to undertake any work directly on or relating to asbestos.

Hexagon's Asbestos Project Manager must be consulted prior to the commission of any asbestos related work.

10.0 Emergency Asbestos Safety Process

10.1 In the event of discovery or disturbance of a material which is known, or suspected, to contain asbestos the asbestos emergency safety process in Appendix 3 (Process diagram 3) must be followed. This also sets out actions to be followed to safeguard individuals and prevent the spread of asbestos. The key steps are:

- Immediately stop work.
- Evacuate and seal off the area.
- Prohibit access to the area.
- Report the incident to the project supervisor (i.e. senior person responsible for the work area to secure the site and take charge pending arrival of the asbestos specialists) and to the asbestos projects manager (Trevor Laurent 020 8778 6699 ext 7982).
- The Asbestos Project Manager will arrange for the emergency attendance by an asbestos specialist. An asbestos assessment will be carried out and any remedial works instructed so that the area can be returned to normal use.

10.2 The Asbestos Projects Manager is responsible for recording all asbestos incidents in the Asbestos Incident Log located in Appendix 5 of the AMP. This log is reviewed regularly and as part of the annual AMP audit/review to identify areas where controls may require improvement.

10.3 The Asbestos Incident Log is only intended to be a summary entry of the asbestos incident for the purposes of determining the frequency of events and identifying potential patterns.

Full details of the incident are to be recorded in line with HSG 245 'Investigating accidents and incidents' and must include:

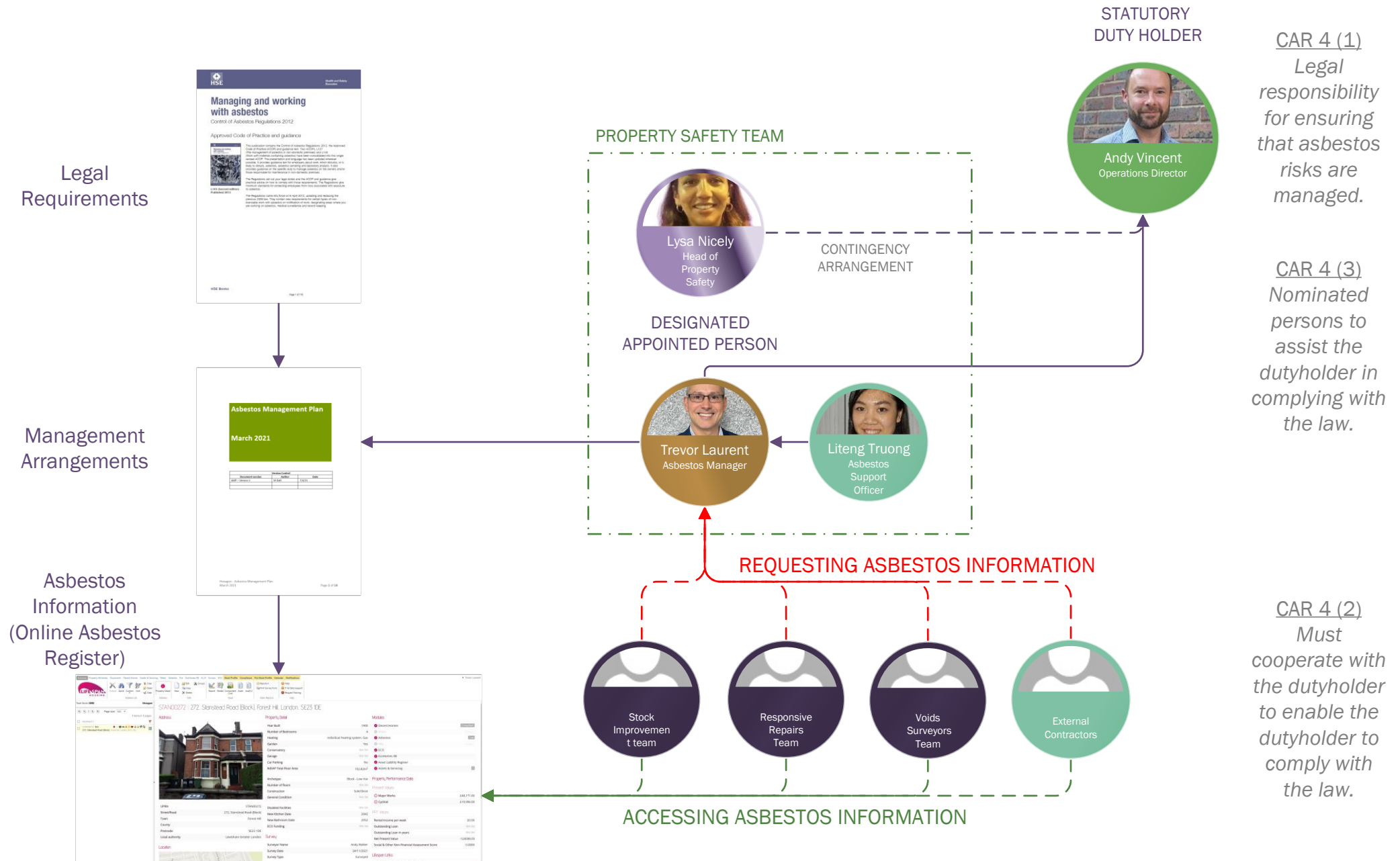
- Where and when the incident happened;
- details of the persons affected;
- details of what occurred;
- details of the planned task or what was going on at the time;
- if anything was unusual or different;
- if a safe system of work was in use and if it was being followed;
- if the risks were known to the persons;
- if the incident was influenced by the planning and management of work;
- if up to date assessments were available and were they satisfactory;
- if the persons involved in the work were competent;
- if the layout of the work influenced the incident;
- if there were difficulties with plant and equipment that could influence the incident;
- and
- if other conditions influenced the incident.

12. Appendices

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APPENDIX 1
Organisational Arrangements and Information Flow (Structure chart)

Control of Asbestos Regulations 2012: Regulation 4 - The Duty to Manage

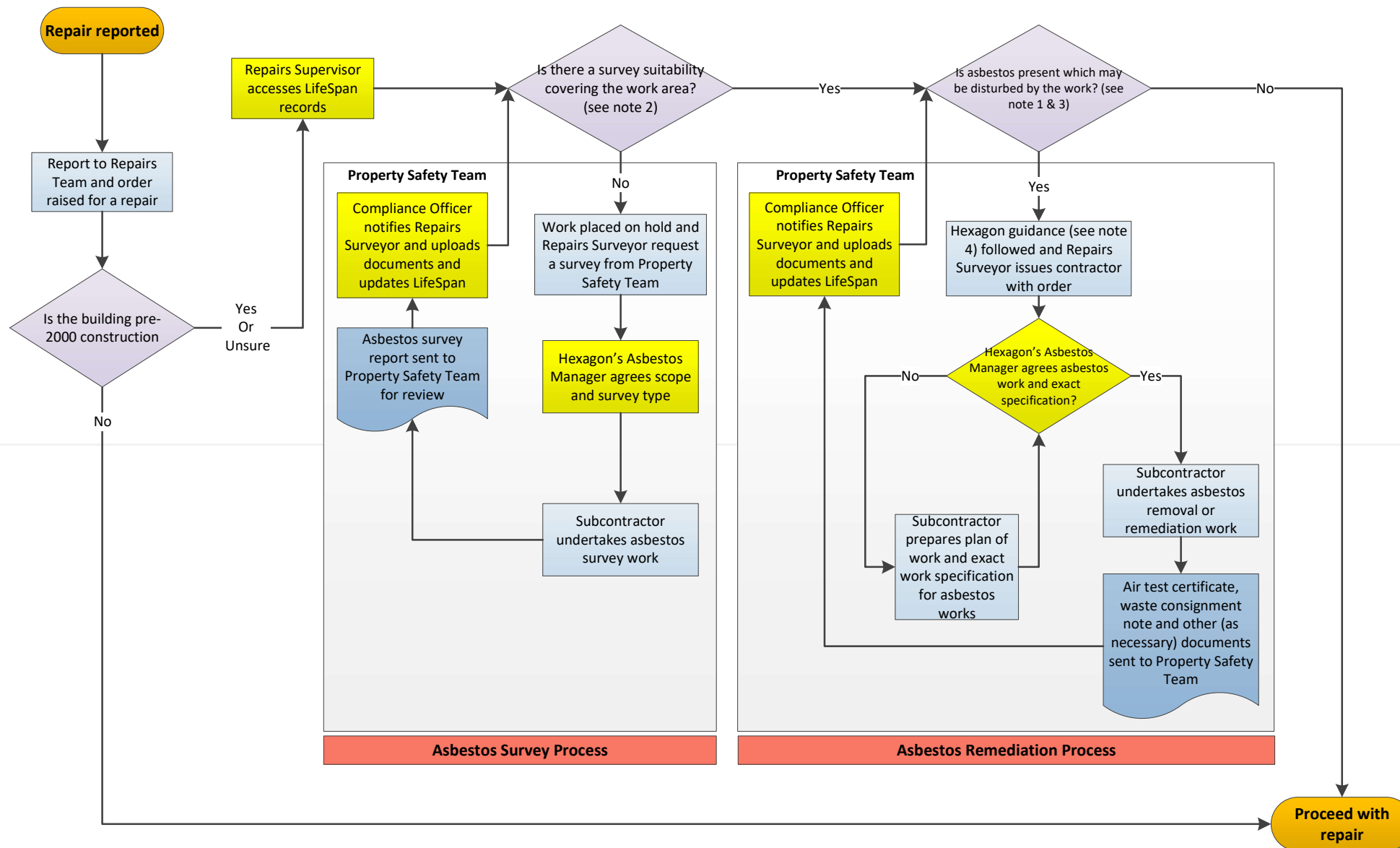


APPENDIX 2
Asbestos Safety Process for Repairs (Process diagram 1)

Hexagon Process 1: Asbestos Safety Process for Repairs (Edition Feb 2024)

Repairs

Contractor



1 - Will the nature of the works to be carried out mean the building fabric is likely to be damaged / disturbed? For example is there a leak which needs to be investigated? Will cupboards, panels etc. need to be removed?

2 - Does the survey cover area of / area liable to be disturbed by the work needed / likely to be needed for the repair? Is the survey purely management level and therefore does not include information about areas behind cupboards, panels etc.? Are there areas listed in the survey as no access or limited access? If the area liable to be worked on is not normally accessible, then it is likely not to have been surveyed if it was only of management level survey. A further refurbishment level survey may be needed of the area in question. If time does not allow for the survey to be carried out (e.g. ongoing water leak) then areas of unknown material **MUST** be assumed to be asbestos and treated as such.

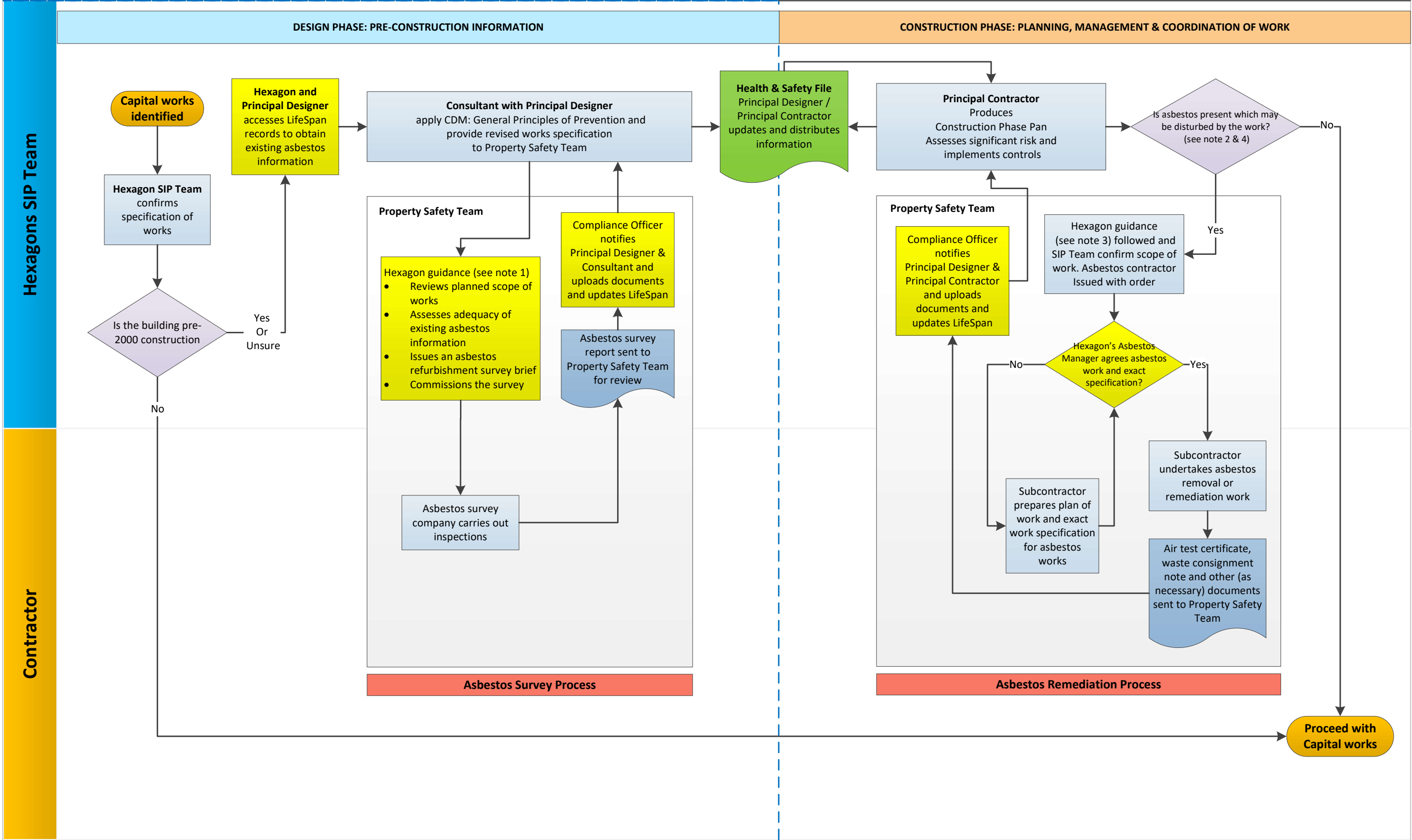
3 - Does the survey highlight ACMs in the same area as, or liable to be disturbed by the work needed for the repair? Can work be done without disturbing the material (e.g. a wall repair in a room with artex ceiling)? Is the material in the way of the repair (e.g. a wall panel which needs to be removed to get to potential water leak)?

4 - Detailed guidance is given as to the generally expected control measures which are needed for the asbestos related works typically carried out on behalf of Hexagon in Appendix 4 of the Hexagon Asbestos Management Plan.

APPENDIX 3

Asbestos Safety Process for Capital Works (Process diagram 2)
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Hexagon Process 2: Asbestos Safety Process for Capital Works (Edition Feb 2024)



1 - Does the survey cover area of / area liable to be disturbed by the works planned? Is the survey purely management level and therefore does not include information about areas behind panels, in hard to reach places (e.g. soffits) etc.? Are there areas listed in the survey as no access or limited access? Are the areas not accessed part of the planned works? If the area liable to be worked on is not normally accessible then it is likely not to have been surveyed if it was only of management level and a further refurbishment level survey will be needed of the area in question. This may have to wait till the project is underway (e.g. if high level access is needed) but consideration should be given to if/how the survey could be undertaken before the project starts on site. This is to help anticipate issues in advance. Where survey information is extrapolated across properties (due to similarities in age / construction between blocks on one estate for example) this must only be done with significant caution and there needs to be confidence that any survey used as the basis for wider assumptions is suitably robust.

2 - Does the survey highlight ACMs in the same area as, or liable to be disturbed by, the planned works? Or any ACM's in close proximity to planned works and therefore liable to accidental damage.

3 - Detailed guidance is given as to the generally expected control measures which are needed for the asbestos related works typically carried out on behalf of Hexagon in Appendix 4 of the Hexagon Asbestos Management Plan.

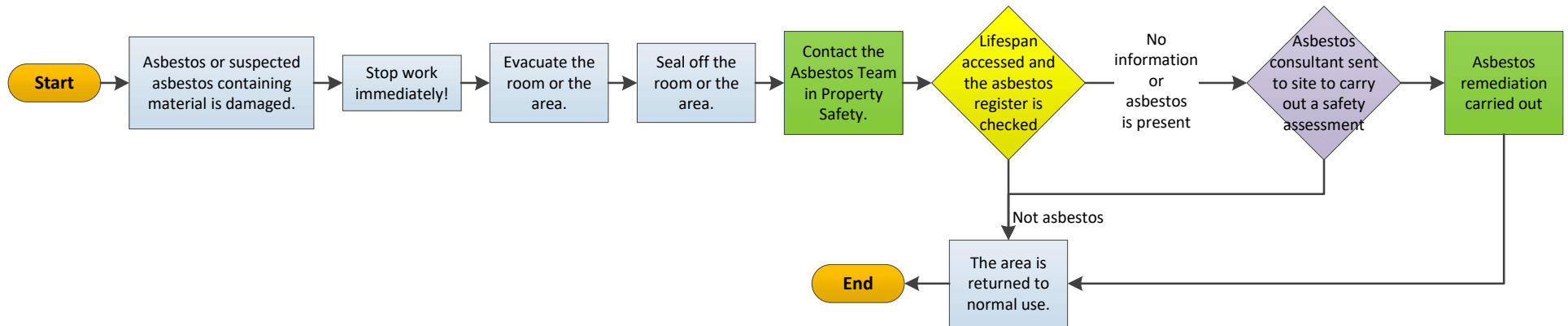
4 - If the survey carried out highlights any items where there is a recommendation to encapsulate, remove or undertake an environmental clean advice should be sought from the Property Safety Team as to how / if this work could be incorporated into the planned capital project or whether it is more practical for this to be carried out in advance.

APPENDIX 4

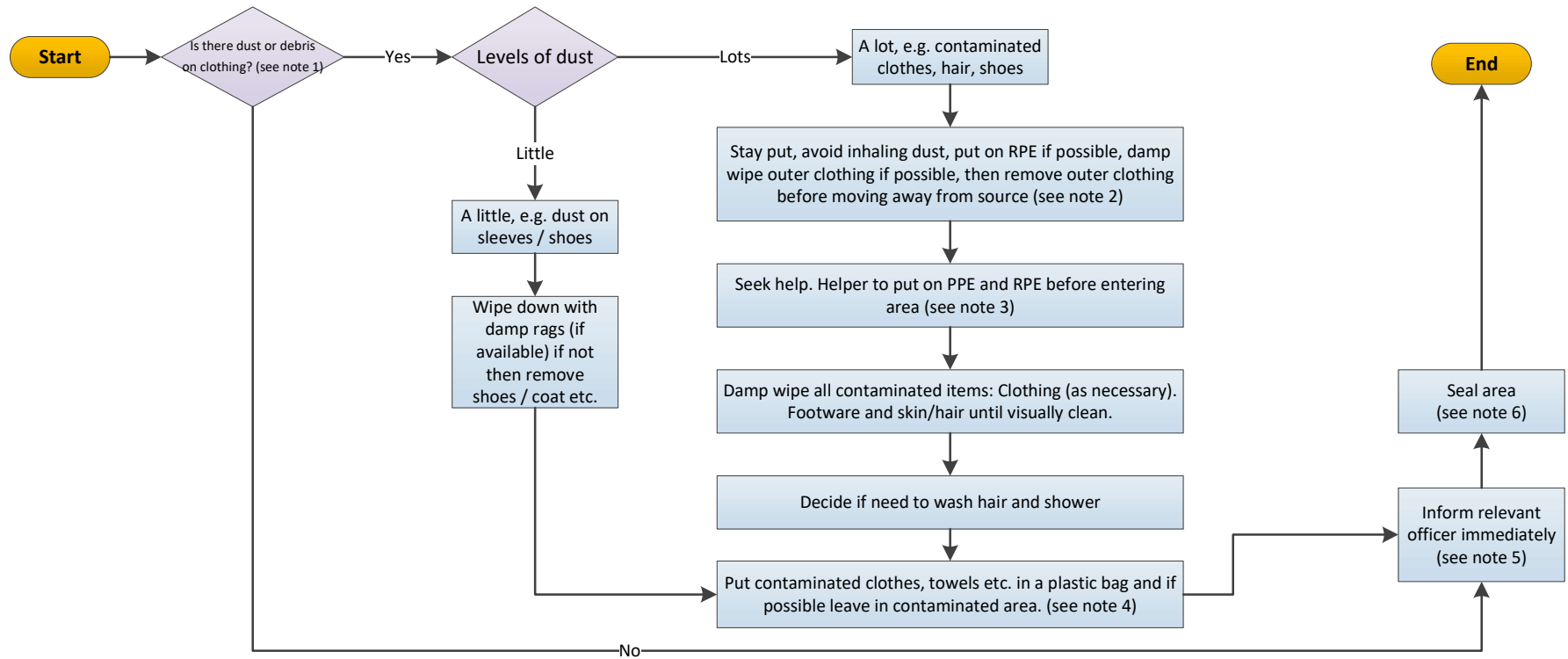
Asbestos Emergency Safety Process (Process diagram 3)
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Hexagon Process 3: Asbestos Emergency Safety Process (Edition Feb 2024)

Incidents with Buildings



Incidents with Individuals



1 – These emergency actions should only NOT be taken if there is no visible dust or debris and the activity carried out was not intrusive (involving no damage to the building fabric such as drilling).

2 – While fully compliant RPE (respiratory protection equipment, meaning a mask) may not be immediately available if any form of mask is to hand the individual should put this on before attempting self decontamination. The aim is to prevent the possibility of spreading contamination outside of the already contaminated area while not unreasonably delaying the individual leaving. In practice this may mean the individual needs to leave the majority of their clothing inside the room / area before they leave. Individuals need to leave as much potentially contaminated clothing, shoes etc. in the contaminated area as possible when they leave.

3 – The individual should only wait in the contaminated area for assistance if this can be obtained promptly, they should not wait while other operatives travel from other sites to attend before they leave. Only if absolutely necessary should other individuals enter a potentially contaminated area, and only if they are fully protected by suitable overalls, boots (without laces or with laces covered with tape to reduce the potential for dust to gather) and face fitting mask (not possible unless clean shaven).

4 – All contaminated items such as clothes, shoes etc. should if possible be bagged up and left in the contaminated area, if bags are not available the items should be left in a place unlikely to be disturbed as close to the exit as practical. In reality this may mean to one side of the door / entrance where they won't be moved. These can then be collected and suitably disposed of by a licenced contractor as part of an environmental clean should it be confirmed that asbestos has been disturbed.

5 – Relevant officers will include the Hexagon Property Safety Team, the relevant Repairs Supervisor / SIP project manager in addition to those listed in the Incident Procedure.

6 – The area / room where it is believed that asbestos has been disturbed should as far as is reasonably possible be sealed off and access restricted - this could be done by locking the door and sealing it with tape but consideration of extractor units, windows etc. also is needed, these should if at all possible be turned off / closed before the individual leaves the area. If the ACM disturbed is in a communal area it may be necessary to restrict access to / from a stairwell, corridor or in worse cases the entirety of the block should there be the possibility that any individual entering could be exposed.

APPENDIX 5

Asbestos Incident Log

ACCIDENTAL DAMAGE & INCIDENT LOG

Date	Details	Action Taken	Date Resolved
04/04/24	38 Foxberry Road <u>Issue:</u> Minor disturbance of artex ceiling during service of a fire alarm in a communal hallway. (Brockley Co-Operative) This ceiling has been similarly disturbed in the past.	<u>Action:</u> ceiling artex removed.	20/06/24
02/08/24	50m Mount Adon Park <u>Issue:</u> False asbestos alarm. Accidental damage of ceiling in a boiler cupboard by S&B operative. Work brought to a stop. Pending assessment.	<u>Action:</u> Lab analysis confirmed ceiling is non-asbestos. S&B retraining staff in their safe system of work.	02/08/24

ACCIDENTAL DAMAGE & INCIDENT LOG

Date	Details	Action Taken	Date Resolved