

# Asbestos Management Policy

Department Policy: Health, Safety & Environment

GENERAL - EXTERNAL

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## 1. Purpose

The Riverside Group aims to proactively manage the potential risk to health arising from asbestos containing materials in buildings owned or managed by TRG and its subsidiaries. This policy and the associated management plan set out the steps TRG will take to identify, assess and control asbestos related risks.

This purpose of this policy is to ensure TRG meets its obligations under the following legislation and regulations (as amended):

- The Health and Safety at Work etc. Act 1974;
- The Management of Health and Safety at Work Regulations 1999;
- The Housing Act 2004 which incorporates the Housing Health and Safety Rating System (HHSRS).
- Control of Asbestos Regulations 2012
- The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR);
- Personal Protective Equipment at Work (Amendment) Regulations 2022
- Hazardous Waste (England & Wales) (Amendment) Regulations 2016
- Construction, Design and Management Regulations 2015
- Environmental Protection Act 1990

TRG will also refer to the following specific guidance and advice on how to comply with the above legislation and regulations:

- HSE Approved Code of Practice (ACOP) L143 'Managing and working with asbestos'.

## 2. Scope

This policy applies to all non-domestic buildings owned or managed by TRG where the responsibility for maintenance and management of the building fabric is under the control of TRG. This specifically includes communal area to residential buildings, offices, shops, commercial units and community centres.

Building specific lease or management agreements may define legal responsibility. Where clear responsibility cannot be defined, the default position for any non-domestic buildings owned or managed is that TRG will actively manage that risk until a time when clearly defined legal responsibility can be evidenced.

The policy applies to domestic dwellings to the extent of asbestos identification and control measures prior to, or during, maintenance and refurbishment works that are undertaken by or on behalf of TRG.

TRG will also undertake a representative sample of management surveys to domestic dwellings at property archetype level, to supplement surveys driven by maintenance and refurbishment works, and to create a reasonable understanding of risk across the portfolio. There is to be no specific target to reach 100% survey of domestic dwellings

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### 3. Principles

UK regulations set out an explicit duty to preventing or controlling the risk from exposure to asbestos. The risks vary with circumstances, ranging from the occupation and safe use of a building to activities associated with the repair, refurbishment and demolition of premises.

The guiding principles of what TRG intends to accomplish through implementation of this policy are as follows:

- Prepare a management plan that's sets out exactly how TRG will manage risk and deliver compliance.
- Appoint a competent person or persons to manage risk.
- Take reasonable steps to locate asbestos containing materials or presume the presence of asbestos.
- Keep a written record of where asbestos has been found (the asbestos register) and make this information available to persons who could potentially disturb the asbestos.
- Take proactive steps to share information with customers regarding ACM's within their home.
- Carry out risk assessment of asbestos containing materials and set priorities for management and the monitoring of material condition to reduce the potential risk.
- Implement effective controls that will prevent works being undertaken within TRG homes that could potentially disturb ACM's without the appropriate safety measures first being in place.
- Maintain a consent process for any work that a tenant wishes to complete in their home that could potentially disturb ACM's. The cost of TRG inspecting, sampling or completing removal works in order to provide consent may be recovered from the tenant.

### 4. Further Information & Support

This policy is to be read in conjunction with:

- TRG Asbestos Management Plan

### 5. Roles and Responsibilities

<b>Executive Director of Asset Services</b>	<ul style="list-style-type: none"> <li>• Responsible for overall policy implementation</li> <li>• Ensure that adequate resources are made available to enable the objectives of the policy to be met.</li> </ul>
<b>Director of Building Safety</b>	<ul style="list-style-type: none"> <li>• The Accountable Risk Lead with responsibility to appoint a Responsible Person.</li> <li>• Responsible for designing and implementing suitable and sufficient operational procedures, including approval of the Asbestos Management Plan.</li> </ul>
<b>TRG Head of Shared Spaces &amp; Compliance</b>	<ul style="list-style-type: none"> <li>• Responsible for the development and implementation of the Asbestos Management Plan.</li> </ul>

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<b>Director of Property Services (OHG)</b>	<ul style="list-style-type: none"> <li>• Ensure all appointed individuals have the appropriate levels of skills, knowledge, education and training.</li> <li>• Legal responsibility for compliance with landlord requirements in relation to asbestos management.</li> </ul>
<b>Head of Business Management</b>	<ul style="list-style-type: none"> <li>• Implement TRG assurance framework utilising 3 lines of defence in accordance with risk management framework.</li> <li>• Governance reporting of statutory compliance.</li> <li>• 3rd Party quality assurance and testing.</li> </ul>
<b>Head of Health Safety &amp; Environment</b>	<ul style="list-style-type: none"> <li>• Liaising with and monitoring enforcement actions from Health &amp; Safety Executive (HSE) or any other enforcing authority responsible for regulating health and safety law.</li> </ul>

## 6. Risks

Whilst the strategic approach to Building Safety is not risk averse in terms of adopting innovation and striving to be a leader in the sector, the safety of Riverside customers and colleagues is a key priority for the organisation. Therefore there is no appetite for risk in terms building safety and compliance with the law.

There is however a tolerance for risk in adopting a proportionate approach to building safety activities, risk assessment and the controls implemented.

Key risks are monitored through a set of monthly Key Performance Indicators (KPI's). The suite of KPI's are embedded within TRG executive management and governance reporting structure.

A building safety risk register is maintained and regularly reviewed to ensure a proactive approach to risk identification, reduction and control.

## 7. Appeal & Complaints

We aim to meet all our obligations to keep our buildings, customers and colleagues safe. To maintain an effective safety testing, installation, maintenance, and servicing regime as detailed in this policy. We will respond to complaints regarding safety concerns in line with our Complaints Policy and Customer Feedback Procedure.

## 8. Equality, Diversity and Inclusion

Riverside is committed to Equality, Diversity & Inclusion. We strive to be fair in our dealings with all people, communities and organisations, taking into account the diverse nature of their culture and background and actively promoting inclusion. This policy aligns with Riverside's Equality, Diversity & Inclusion Policy and has been subject to an Equality Impact Assessment.

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