

Professional Practice Sessions



3) Stairlift Compliance – **Tweed Room**

Terence Clark, Regional Sales Manager, Stannah Stairlifts

Eddie Kirkhum, Technical Support Manager, Stannah Stairlifts

4) Using Data to Demonstrate Compliance – **Denim Room**

Devinder Singh, Head of Business Support (Compliance), Together Housing Group

Michael Jeffery, HCI Limited

5) Asbestos Management – What makes an excellent asbestos management plan - **Wool Room (This Room)**

Tom Byers, Head of Compliance, Pennington Choices Ltd

Andy Brown, Operations Manager, Pennington Choices Ltd



What makes an excellent Asbestos Management Plan (AMP) ?



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Contents

- The Importance of an AMP
- What does the law say?
- The ideal AMP and common mistakes

The Importance of an AMP

Asbestos doesn't quite hit the headlines as easily as other compliance areas, but it should - there's still around 5000 deaths in the UK per annum from asbestos related diseases.

It's Britain's biggest workplace killer.

Compare that to Fire (261 in 2016/17), excludes Grenfell. Or around 1700 in car accidents.

We thought the fatality rates would be dropping by now. They're not.

What does the law say?

Regulation 4 is extremely important. This regulation is the duty to manage asbestos in non domestic premises.

Remember - a number of people may be classified as duty-holders, whether they are nominated or not.

Persons could have duty-holder responsibilities if they have responsibilities for maintenance or for access to a property.

Domestic dwellings become workplaces for those contractors working in them and some parts of the regulations still apply.

The Ideal AMP - Contents

A straightforward contents page could look like this:

- Introduction
- Legislation
- Scope and Strategy
- Roles, responsibilities and contact information
- Surveying and sampling
- Remedial works
- Asbestos register (including Action Plan)
- Quality assurance
- Competency and Training
- Emergency Procedures
- Monitoring and review
- Approval
- Appendices



The Ideal AMP and common mistakes

The overall strategy:

- Board approved policy and AMP.
- A clear surveying and re-inspection strategy
- Strategy for managing or remediation.
- Demonstration of impartiality (surveying / remediation split)
- Budget and priority consideration.
- Lifecycle costs. Is it cheaper to remove an item than it is to re-inspect it every year for the next 5 years?



A lack of clearly allocated tasks:


- Tasks for individuals should not be wrapped up as TEAM tasks....
- Contact details should be provided for internal staff.
- The role of external organisations should be detailed - who will be carrying out the works and their contact details. Do they have a copy of the AMP?

Property information:

- There needs to be a policy for 100% Communal areas surveyed.....but
- What about the process of acquisition and stock swaps? 'Unknown' properties?
- Data reconciliation processes between databases being carried out regularly?

Lack of survey strategy:

- HSG 264 sets out the basic guidance.
- Management surveys for everyday occupation and maintenance. Supplement with information from Refurb surveys.
- What percentage? Increase until consistent patterns and reduce reliance on cloned information.
- Hybrid management/ refurbishment surveys can help and make full use of Voids!
- When conducting refurbishment surveys - some programmes warrant a 100% property such as scattered street-side and externals.




Lack of strategy for carrying out re-inspection surveys:

- L143 states annual...is there flexibility here?
- Carried out internally or externally?
- Competency vs cost.

Lack of strategy for ensuring the register is up to date and that everyone can access the register:

- There needs to be a clear process for updating the register after surveys, re-inspections, sampling exercises and removals.
- There should be clear task allocation.
- Are data extracts coming through from the consultant with the main reports?
- Can everyone access the register on-site.... even the smaller contractors?
- How.....? This should be stated in the AMP - then checked in practice.



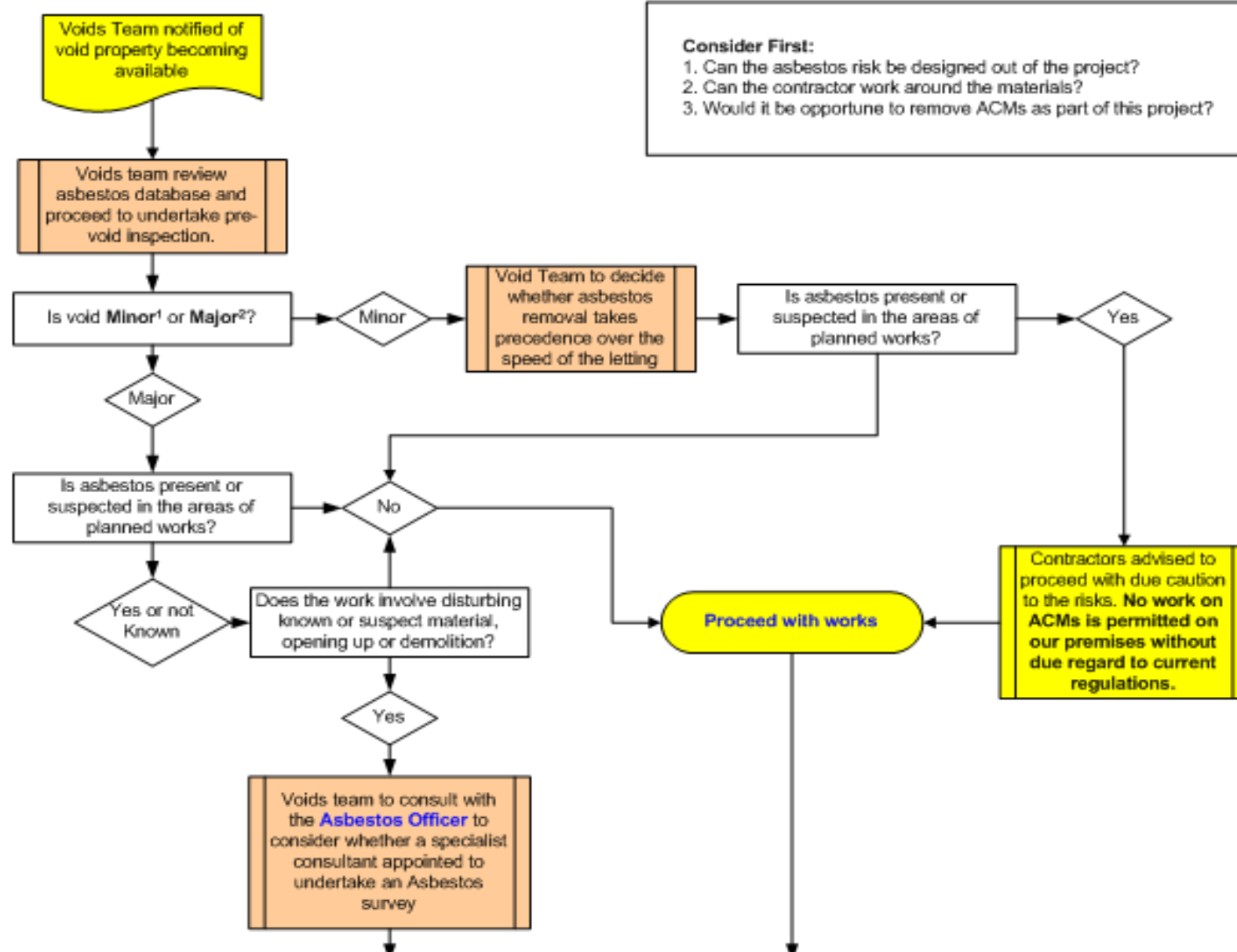
Lack of process for ensuring proper collation of removal documents and amendment to the register:

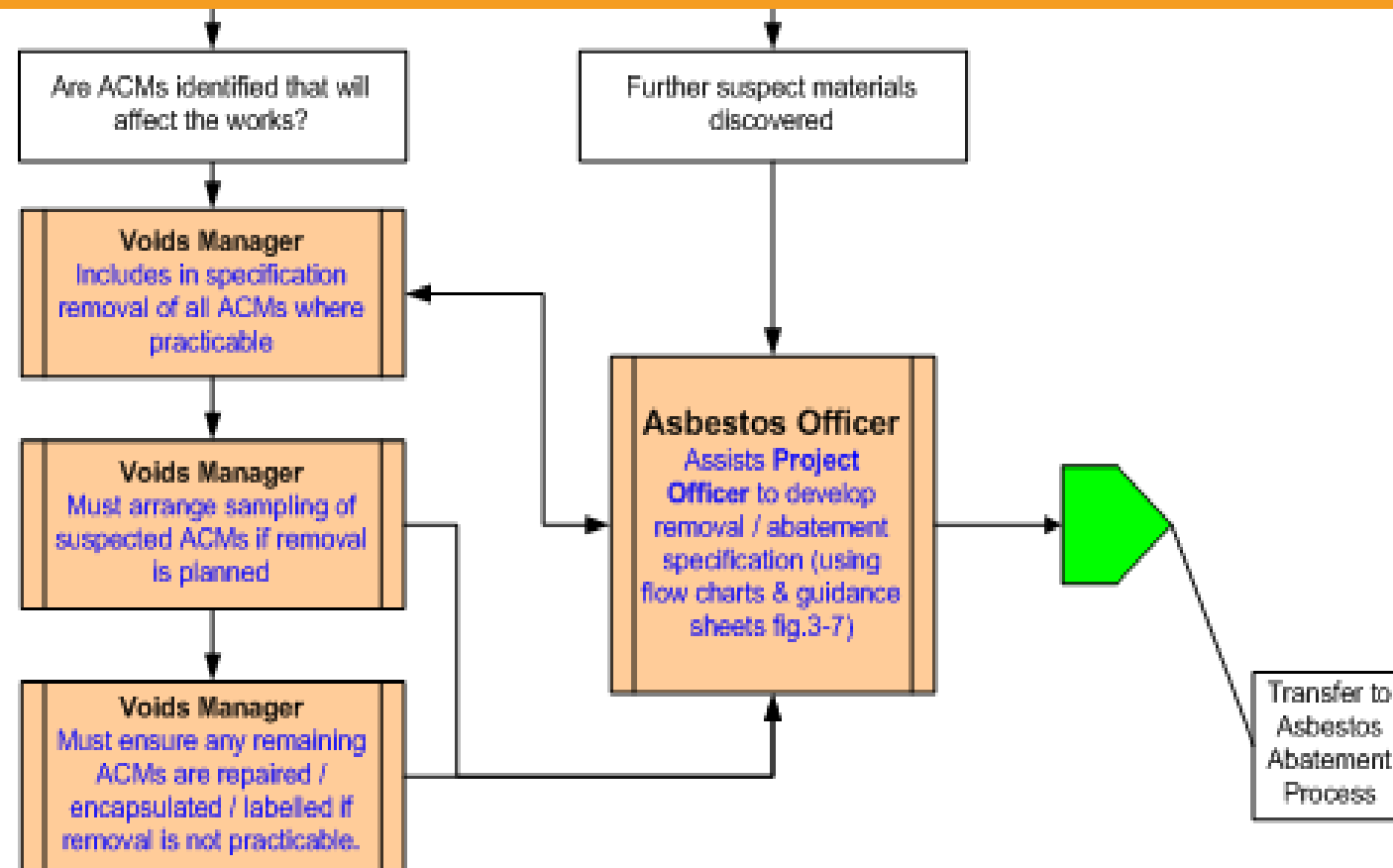
- Which documents are needed?
- ASB5, RAMS, 4-stage clearance / certificate of re-occupation, Air monitoring certs
- What about non-licensable works- Certificates of Cleanliness.
- How are documents collected and by who?

Lack of comprehensive and easy to use flowcharts:

- They illustrate complex processes well, especially for differing void, reactive and planned works.
- They can illustrate removal processes and emergency processes well.
- They need to show clear lines of task ownership, flow of information and timescales.
- Make them easy to access by everyone who needs them!

Procedure for Voids Maintenance





Minor¹ void = where the premises is to be re-let within 6 working days and the work only comprises redecoration and/or replacement of fixtures and fittings (e.g. taps).

Major² void = where the premises is deemed to require works which will involve major alterations or disturbance of the building fabric (e.g. replacement of kitchen or bathroom, removal of partitions, electrical rewire, plumbing).

Incident Management

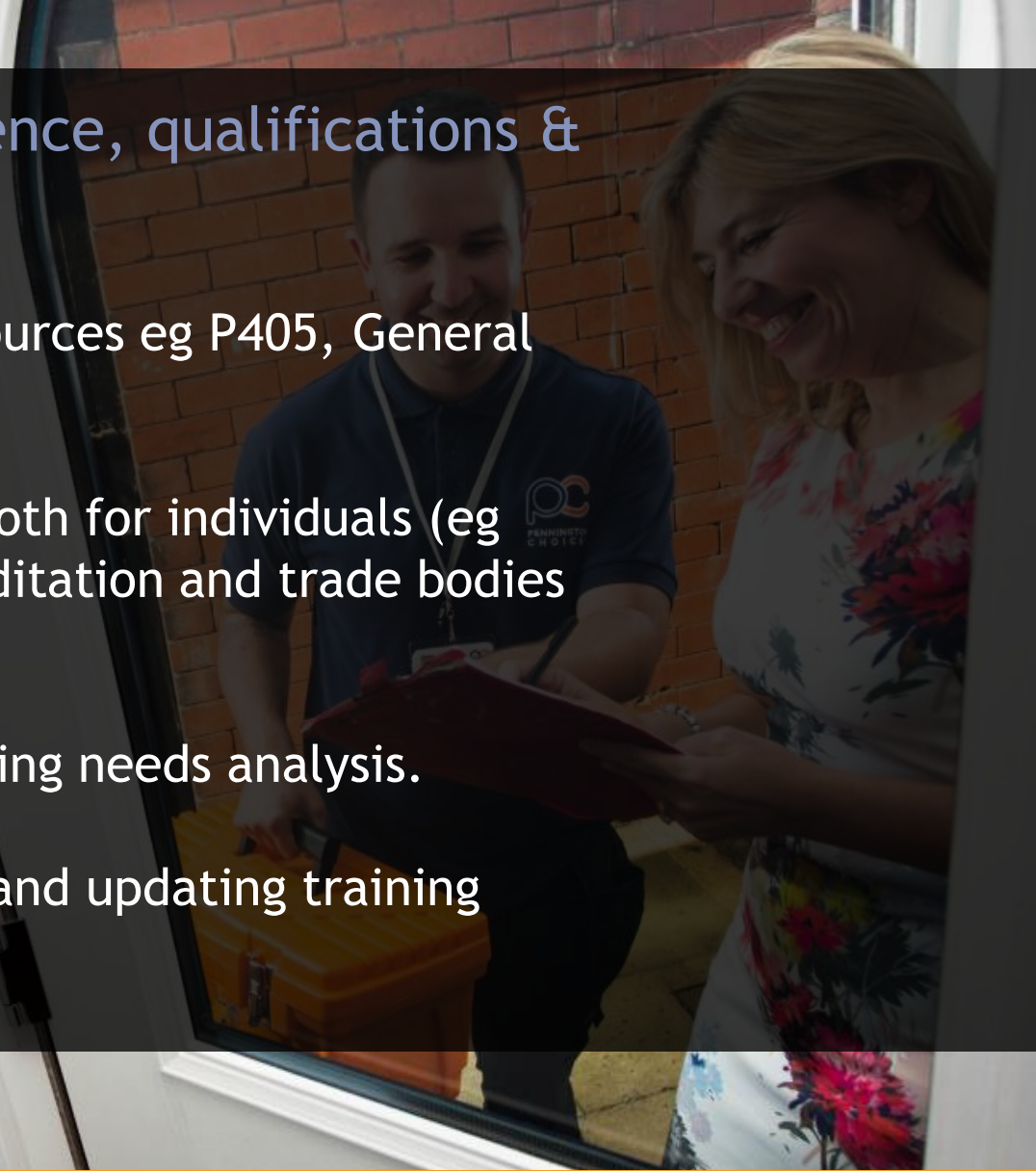
Course of action to be taken if you realise that you may be working on ACMs that you had not been warned about, or they are accidentally damaged during the job

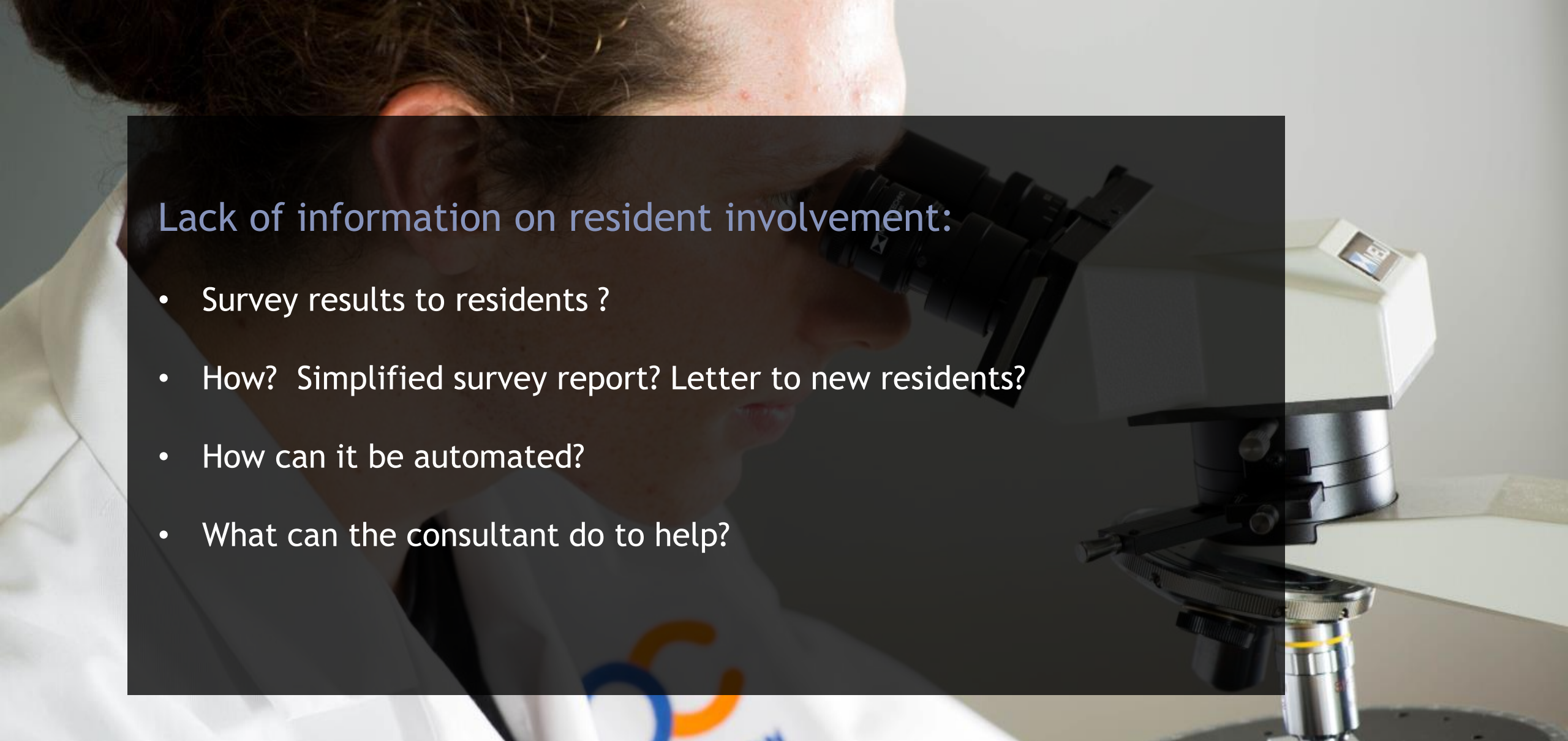


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Lack of information on competence, qualifications & training requirements:

- The amp should cover internal resources eg P405, General asbestos awareness training etc
- Also cover external organisations both for individuals (eg P402 and CCP) and company accreditation and trade bodies eg UKAS, UKATA, ARCA, ATAC etc
- Clear guidance on conducting training needs analysis.
- Documented method for retaining and updating training records.



A person with dark hair, wearing a white lab coat, is looking through the eyepiece of a microscope. The background is a soft, out-of-focus grey. The microscope is white and black, with a yellow band on the objective lens.

Lack of information on resident involvement:

- Survey results to residents ?
- How? Simplified survey report? Letter to new residents?
- How can it be automated?
- What can the consultant do to help?

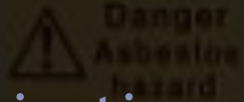


No overall quality assurance framework in place:

- Internal audits.
- External site visits & audits and checks on paperwork.
- Checks on asbestos processes of general contractors?

Problems with them being monitored and updated:

- The AMP needs to be reviewed / updated annually at least.
- In particular new processes with introduced software systems need to be properly detailed.
- It's only useful if it's relevant and up to date.



Problems in its communication:

- It needs to be obvious where to find the AMP and it should be stated in the AMP where!
- A new AMP needs to be launched properly with all the right people present.

